

Castle Plus Neighbourhood Plan

Strategic Environmental Assessment and Appropriate Assessment

Screening Report



August 2026

Wednesday, 02 September 2026

Dear Mr Whelan,

Strategic Environmental Assessment and Appropriate Assessment Screening Report for the Castle Plus Neighbourhood Plan

I write to advise that on the 24 August 2026 it was agreed that Hertford Town Council be advised that:

- (a) In accordance with Regulation 9 of the Environmental Assessment of Plans and Programmes Regulations 2004, the District Council, as the responsible authority, has determined that an environmental assessment of the emerging Castle Plus Neighbourhood Area Plan is not required as it is unlikely to have significant environmental effects. In making this determination, the District Council has had regard to Schedule 1 of the Regulations and has carried out consultation with the consultation bodies; and**
- (b) The emerging Castle Plus Neighbourhood Area Plan is unlikely to have a significant effect upon a Natura 2000 designation and therefore does not require an HRA.**

This decision was subject to a call-in period which expired on Tuesday 1st September.

If you require any further information please do not hesitate to contact me.

Kind regards,



Laura Guy
Principal Planning Officer
Planning Policy

East Herts Council – Non-Key Decision Record

Record of executive decision made by an individual under Regulation 13 of the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012

Reference Number: NKD26/08

Taken by: Councillor Vicky Glover-Ward – Executive Member for Planning and Growth

Decision

That Hertford Town Council be advised that:

- A) In accordance with Regulation 9 of the Environmental Assessment of Plans and Programmes Regulations 2004, the District Council, as the responsible authority, has determined that an environmental assessment of the emerging Hertford Castle Plus Neighbourhood Area Plan is not required as it is unlikely to have significant environmental effects. In making this determination, the District Council has had regard to Schedule 1 of the Regulations and has carried out consultation with the consultation bodies; and
- B) The emerging Hertford Castle Plus Neighbourhood Area Plan is unlikely to have a significant effect upon a Natura 2000 designation and therefore does not require a Habitat Regulation Assessment (HRA).

Date of Decision

24 August 2026

Reason(s) for decision

The purpose of this report is to determine whether or not a Strategic Environmental Assessment (SEA) and/or a Habitats Regulations Assessment (HRA) of the emerging Hertford Castle Plus Neighbourhood Area Plan are required.

Details of alternative options considered and rejected

In order for a Neighbourhood Plan to meet the Basic Conditions it must be compatible with relevant legal obligations. Therefore the Local Planning Authority must determine whether the Plan requires a Strategic Environmental Assessment or Habitats Regulations Assessment. A Neighbourhood Plan cannot proceed through examination without fulfilling the legal requirements of the SEA and HRA process.

Does the decision or report contain exempt information?

No

State nature of any declaration of conflict of interest made by any Executive Member who is consulted by the Member taking the decision

None

State, in respect of any declared conflict of interest, whether any dispensation has been granted

None

Contact Officer

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East Herts Council Non-Key Decision Report

Date: 10 August 2026

Report by: Councillor Vicky Glover-Ward – Executive Member for Planning and Growth

Report title: Hertford Castle Plus Neighbourhood Area Plan
Draft Pre-Submission SEA/ HRA Screening Report

Ward(s) affected: Hertford Bengoe; Hertford Castle; Hertford Kingsmead

Summary

- The purpose of this report is to determine whether or not a Strategic Environmental Assessment (SEA) and/or a Habitats Regulations Assessment (HRA) of the emerging Hertford Castle Plus Neighbourhood Area Plan is required.
- The report concludes that the Neighbourhood Plan does not require either a Strategic Environmental Assessment (SEA) or a Habitats Regulations Assessment (HRA) because the Plan is not likely to have any significant environmental effects.

RECOMMENDATIONS FOR DECISION: That Hertford Town Council be advised that:

- A) In accordance with Regulation 9 of the Environmental Assessment of Plans and Programmes Regulations 2004, the District Council, as the responsible authority, has determined that an environmental assessment of the emerging Hertford Castle Plus Neighbourhood Area Plan is not required as it is unlikely to have significant environmental effects. In making this determination, the District Council has had regard to Schedule 1 of the Regulations and has carried out consultation with the consultation bodies; and**
- B) The emerging Hertford Castle Plus Neighbourhood Area Plan is unlikely to have a significant effect upon a Natura 2000 designation and therefore does not require a Habitat Regulation Assessment (HRA).**

1.0 Proposal(s)

- 1.1 In order for a neighbourhood plan to meet the Basic Conditions to proceed to Referendum, the Local Planning Authority must determine whether a neighbourhood plan requires a Strategic Environmental Assessment (SEA), and/or a Habitats Regulations Assessment (HRA). Informed by a detailed report prepared by Hertford Town Council and the responses of the three statutory consultees, this report provides a screening opinion on whether the Hertford Castle Plus Neighbourhood Area Plan requires either assessment.

2.0 Background

SEA Legislative Background

- 2.1 The European Directive 2001/42/EC requires a Strategic Environmental Assessment (SEA Directive) to be carried out for certain plans and programmes to assess their effects on the environment. This Directive was transposed in UK law by the Environmental Assessment of Plans and Programmes Regulations 2004.
- 2.2 Neighbourhood Plans fall within the scope of this legislation. They are a plan as defined by Article 3(2) of the SEA regulations and Regulation 5 paragraph 2 of the Environmental Assessment of Plans and Programmes Regulations 2004.
- 2.3 Under Article 3(2) of the SEA Directive and Regulation 5 paragraph 6 of the Environmental Assessment of Plans and Programmes Regulations 2004, Strategic Environmental Assessment (SEA) is only required for documents that determine land use in small areas at the local level where it is considered that they are likely to have 'significant environmental effects'. This is carried out through a screening determination.
- 2.4 The role of a screening exercise is to determine whether the effect of the implementation of a plan or programme is likely to have a significant effect on the environment.

HRA Legislative Background

- 2.5 The Conservation of Habitats and Species Regulations 2017 (as amended) transpose the requirements of the European Habitats

Directive 92/43/EEC into UK law. The Habitats Directive and Regulations afford protection to plants, animals and habitats that are rare and vulnerable in a European context.

2.6 Habitats Regulations Assessment (HRA) is a systematic process through which the performance of a plan or project can be assessed for its likely impact on the integrity of a European Site. European Sites, also referred to as Natura 2000 sites, consist of Special Protection Areas (SPA), Special Areas of Conservation (SAC); Potential Special Protection Areas and candidate Special Areas of Conservation (pSPA and cSAC); and listed or proposed Ramsar sites.

2.7 Article 6(3) of the Habitats Directive states: 'Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans and projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives'.

2.8 The first stage of HRA is to screen a plan or programme to identify if there are likely to be any significant effects on Natura 2000 sites. This will indicate whether a full Appropriate Assessment is required.

3.0 Reason(s)

SEA:

3.1 To decide whether a draft neighbourhood plan might have significant environmental effects, its scope needs to be assessed against the criteria set out in Schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004.

3.2 The local planning authority is required to put in place a process to provide a screening opinion to the qualifying body (in this case, Hertford Town Council) on whether the proposed neighbourhood plan will require a Strategic Environmental Assessment (SEA). The qualifying body should work with the local planning authority to ensure that the authority has the information that it needs to provide a screening opinion.

3.3 When deciding on whether proposals are likely to have significant environmental effects, the local planning authority is required to consult Historic England, Natural England and the Environment

Agency (the 'statutory consultees').

- 3.4 Hertford Town Council (the qualifying body) has produced a draft Castle Plus Neighbourhood Plan, for the ward of Hertford Castle and the parts of Bengoe and Kingsmead wards (Hertford Town Council wards of Bengoe South and Kingsmead West) not covered by existing neighbourhood plans in the town. The draft Neighbourhood Plan contains policies on:
- Green space and nature
 - Community facilities and amenities
 - Movement
 - Sustainable homes
 - Heritage and Design
 - Business and Economy
- 3.5 It does not allocate any sites for development and the policies of the Neighbourhood Plan relating to design; designation of local green space; protection of local heritage and character, green and blue infrastructure and environmental sustainability aim to have a positive impact on the neighbourhood area's historic and natural environment.
- 3.6 Hertford Town Council has prepared a Strategic Environmental Assessment (SEA) and Habitat Regulation Assessment (HRA) Screening Report, which is attached at **Appendix A**. The SEA screening identifies a range of sensitive environmental assets in the neighbourhood area (including a scheduled ancient monument, listed buildings, a conservation area, wildlife sites, priority habitats and areas of flood risk), but sets out that they are not impacted negatively by the proposals in the Neighbourhood Plan. It concludes that the Castle Plus Neighbourhood Area Plan is not likely to have significant environmental effects.
- 3.7 The Environment Agency, Natural England and Historic England have all been consulted on this screening assessment and their responses are attached at **Appendix B**. Historic England and Natural England confirmed that they do not consider an SEA is required for the Neighbourhood Plan as there are unlikely to be significant environmental effects. Natural England clarified that any decision should also be informed by consideration of locally specific issues. It is not considered that the draft Neighbourhood Plan will have a significant effect on local habitats, species and landscape because, as set out in the screening report (**Appendix**

A), the proposed policies seek to protect and enhance the natural environment.

- 3.8 The Environment Agency has noted in their response that they are currently prioritising their limited resources and focusing on strategic plans where environmental risks and opportunities are highest. As such, they have not directly confirmed if an SEA is required. Instead, they have sent an advice note (as at **Appendix B**), which provides general information about flood risk and the protection of environmental assets, to help inform the Council's decision. On the basis of this guidance, it is considered there are unlikely to be significant effects arising from the neighbourhood plan because the Neighbourhood Plan (1) is not allocating sites for development; (2) it is in accordance with national and local flood risk policy; and (3) it includes policies that will have a positive impact on the environment, for example, in relation to ecology and green and blue infrastructure. Therefore, it is not considered that an SEA is required for this Neighbourhood Plan.

HRA:

- 3.9 The Local Authority is the 'competent authority' under the Conservation of Habitats and Species Regulations 2010, and needs to ensure that Neighbourhood Plans have been assessed through the Habitat Regulations process. This looks at the potential for significant impacts on nature conservation sites that are of European importance, also referred to as Natura 2000.
- 3.10 There are no Natura 2000 sites within the neighbourhood area, but three sites lie within 3km, partly within East Hertfordshire, – Lee Valley SPA; Lee Valley Ramsar site; and Wormley – Hoddesdon Park Woods Special Area of Conservation (SAC). Epping Forest SAC is located 14km from the neighbourhood area boundary. Pressures on sensitive internationally protected sites might include pressure from overuse for recreation, atmospheric pollution and water abstraction/water quality.
- 3.11 Section 9 of the screening report, at Appendix A, considers the impact of the draft Neighbourhood Plan on these designations. It concludes that as the Neighbourhood Plan does not allocate sites for development and includes policies that address these pressures (such as designation of local green space, protection of recreational open space, promotion of sustainable movement and blue and green infrastructure enhancement) there are not likely to be significant effects on the European sites. Natural England were

also consulted on this issue and agreed that significant effects on the Natura 2000 sites are unlikely (see **Appendix B**). Therefore, it is concluded that the requirement for the Plan to undertake further assessment under the Conservation of Habitats and Regulations 2017 (as amended) is screened out.

4.0 Options

- 4.1 In order for a Neighbourhood Plan to meet the Basic Conditions it must be compatible with relevant legal obligations. Therefore, the Local Planning Authority must determine whether the Plan requires a Strategic Environmental Assessment or Habitats Regulations Assessment. If the determination is not made the process will not be legally compliant.

5.0 Risks

- 5.1 A Neighbourhood Plan cannot proceed through examination without fulfilling the legal requirements of the SEA and HRA process.

6.0 Implications/Consultations

- 6.1 The Neighbourhood Plan process requires statutory public consultation. This screening determination has been informed by consultation with statutory consultees.

Community Safety

There are no community safety implications arising from this report.

Data Protection

There are no data protection implications arising from this report.

Equalities

There are no equality implications arising from this report.

Environmental Sustainability

The recommendations in this report ensure that environmental considerations have been appropriately assessed as part of the neighbourhood planning process. The screening assessment concludes that the Plan is unlikely to result in significant environmental effects and contains policies that seek to protect and enhance the natural and historic environment.

Financial

There are no financial implications arising from this report.

Health and Safety

There are no health and safety implications arising from this report.

Human Resources

There are no human resources implications arising from this report.

Human Rights

There are no human rights implications arising from this report.

Legal

The Environmental Assessment of Plans and Programmes Regulations 2004 and the Conservation of Habitats and Species Regulations 2017 (as amended) require the Local Planning Authority to determine whether a neighbourhood plan requires Strategic Environmental Assessment and/or Habitats Regulations Assessment. The recommendations ensure compliance with these statutory requirements and enable the Neighbourhood Plan to continue through the statutory plan-making process.

Specific Wards

Hertford Castle, Hertford Bengoe and Hertford Sele

7.0 Background papers, appendices and other relevant material

7.1 **Appendix A:** Hertford Castle Plus Neighbourhood Area Plan SEA and HRA Screening Report

7.2 **Appendix B:** Statutory Consultee Responses

Contact Member

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Castle Plus Neighbourhood Plan

SEA/HRA Screening Report

June 2026



Prepared by Govresources Ltd

for

Hertford Town Council

1. SEA in Castle Plus Neighbourhood Plan Area

- 1.1 This report sets out a draft Screening Determination for the Castle Plus Neighbourhood Plan Area and has been prepared for the Hertford Town Council by Govresources Ltd.
- 1.2 The Castle Plus Neighbourhood Plan (CPNP) has been prepared for Hertford Town Council (as the accountable body) for the Castle Plus Neighbourhood Plan Area (agreed by East Herts Council on 7th March 2024), which encompasses the entire Hertford Castle District Ward and small parts of Kingsmead and Bengoe Wards (due to recent boundary changes.) This area incorporates the southern and eastern parts of the town, plus the village of Hertingfordbury and rural area to the south (see Figure 1). It will guide the future sustainable growth of this area of Hertford and help inform planning decisions to 2033.

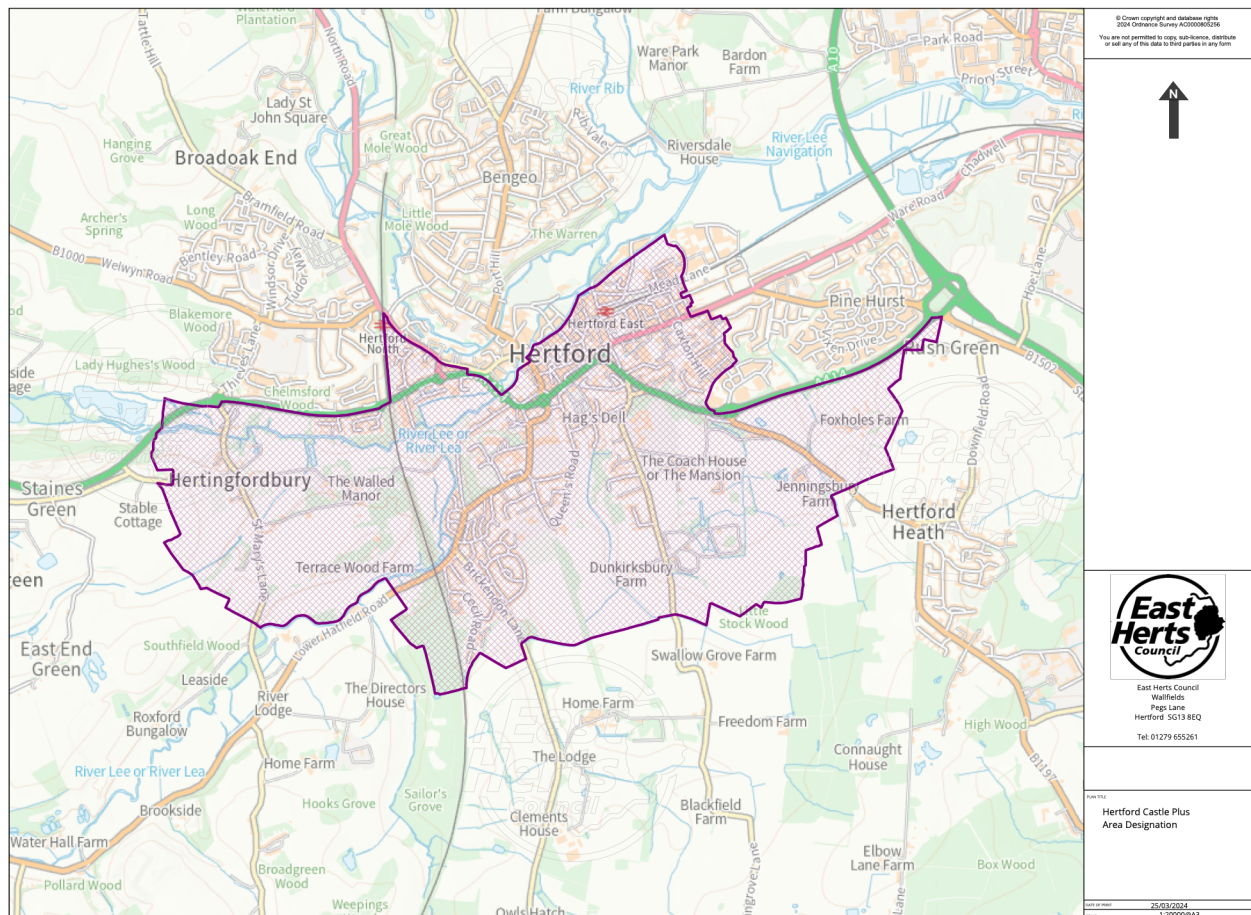


Figure 1 Castle Plus Neighbourhood Plan Designated Area

- 1.3 The purpose of the screening report is to determine whether the CPNP is likely to have any significant environmental effects and so require a Strategic Environmental Assessment (SEA). More detail is given in the following sections on Legislative Background (section 2), Establishing a Need for an SEA (section 3), and Castle Plus Neighbourhood Plan (section 4).
- 1.4 National and Local Policy are reviewed in sections 5 and 6.
- 1.5 A Screening Assessment table can be found in section 7 followed by a draft Screening Determination in section 8.

- 1.6 The Screening Report has been written based on the Draft Vision, Objectives and Policies of the Castle Plus Neighbourhood Plan presented at Castle Plus Neighbourhood Plan Steering Group 14 April 2026 (as amended).
- 1.7 A considerable amount of research was carried out into the historical features of the area including consultation with Hertfordshire County Council's Historic Environment Records office. In addition, resources on wildlife sites and other local and national environmental designations have been gathered in the process of preparing the CPNP, including a comprehensive set of maps and descriptions kindly provided by the Herts Environmental Records Centre, and with reference to the recently published Local Nature Recovery Strategy.

2. Legislative Background

- 2.1 The European Union Directive 2001/42/EC requires an SEA to be carried out for certain types of plans and programmes that could have significant environmental effects. The Environmental Assessment of Plans and Programmes Regulations 2004 (the Regulations) transposed this Directive in law for England and Wales.
- 2.2 Neighbourhood plans fall within the scope of this legislation. They are a plan as defined by Article 3(2) of the SEA Directive and Regulation 5 paragraph 2 of the Environmental Assessment of Plans and Programmes Regulations 2004.
- 2.3 Under Article 3(2) of the SEA Directive and Regulation 5 paragraph 6 of the Regulations, Strategic Environmental Assessment (SEA) is only required for documents that determine land use in small areas at the local level where it is considered that they are likely to have significant environmental effects.
- 2.4 The Conservation of Habitats and Species Regulations 2017 transpose the requirements of the European Habitats Directive 92/43/EEC into English law. The Habitats Directive and Conservation of Habitats and Species Regulations afford protection to plants, animals and habitats that are rare and vulnerable in a European context.
- 2.5 Habitats Regulations Assessment (HRA) is a systematic process through which the performance of a plan or project can be assessed for its likely impact on the integrity of Natura 2000 sites, consisting of Special Protection Areas (SPA), Special Areas of Conservation (SAC); Potential Special Protection Areas and candidate Special Areas of Conservation (pSPA and cSAC); and listed or proposed Ramsar sites). There are internationally designated sites just outside the Neighbourhood Plan Area: Wormley-Hoddesdon Park Woods and the Lea Valley Ramsar and SPA. Epping Forest SAC is approximately 14km from the neighbourhood plan area.
- 2.6 Under Regulation 9 of The Environmental Assessment of Plans and Programmes Regulations (2004), the responsible body (local parish or town council or neighbourhood forum) is required to determine whether a plan or programme is likely to have significant environmental effects. This assessment is carried out through a screening determination, using a specified set of criteria (set out in Schedule 1 of the Regulations). In accordance with the Regulations, the results of the screening process are set out in this SEA Screening Determination report, which must be publicly available, submitted with the Neighbourhood Plan proposal and made available to the independent examiner.

- 2.7 Paragraph 195 of the National Planning Policy Framework (NPPF) 2024 as amended, states that “The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site”. According to the NPPF, a habitats site is “Any site which would be included within the definition at regulation 8 of the Conservation of Habitats and Species Regulations 2017 for the purpose of those regulations, including candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation, Special Protection Areas and any relevant Marine Sites” (p.73).

3. Establishing a Need for an SEA

- 3.1 Planning Practice Guidance states that “to decide whether a draft Neighbourhood Plan might have significant environmental effects, it must be assessed (screened) at an early stage of the plan’s preparation according to the requirements set out in regulation 9 of the Environmental Assessment of Plans and Programmes Regulations 2004”¹. For the avoidance of doubt, ‘early stage’ is clarified in the Environmental Assessment of Plans and Programmes Regulations 2004 reg 5(4) which requires the responsible authority to “carry out, or secure the carrying out of an environmental assessment, in accordance with Part 3 of these Regulations, during the preparation of that plan or programme and before its adoption or submission to the legislative procedure.” The draft CPNP will be consulted upon at Regulation 14, by Hertford Town Council, in summer 2026.
- 3.2 The guidance also suggests that “The local planning authority, as part of its duty to advise or assist, should consider putting in place processes to determine whether the proposed Neighbourhood Plan will require a strategic environmental assessment.”² In this case East Herts District Council (EHDC) as the responsible authority will help by seeking the opinions of the three statutory consultation bodies in undertaking the screening determination.
- 3.3 The Guidance notes that generally, an SEA is more likely to be necessary if:
- a Neighbourhood Plan allocates sites for development
 - the Neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan
 - the Neighbourhood Plan is likely to have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan.
- 3.4 The CPNP has been assessed in accordance with the criteria outlined in Schedule 1 of the SEA Regulations taking account of the Planning Practice Guidance in reaching its conclusions.
- 3.5 The three statutory environmental bodies designated in the regulations (Historic England, the Environment Agency and Natural England) are to be consulted on the draft

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

² ibid

Neighbourhood Plan to determine whether an environmental assessment is required. This draft screening report has been produced to facilitate that consultation.

4. Castle Plus Neighbourhood Plan (CPNP)

- 4.1 Hertford Castle Plus designated area covers three Hertford wards, Castle, Bengoe South and Kingsmead West. It spans around 667 hectares and encompasses most of the southern part of Hertford including most of the town centre area. More than two thirds of the area is designated as Green Belt.
- 4.2 The built environment of the Castle Plus area reflects the long historic development of Hertford and includes buildings and structures from a wide range of periods. Within the historic core, many buildings date from the medieval and post-medieval periods, including timber framed buildings, historic inns and townhouses that contribute to the character of the town centre. Later architectural styles are also represented throughout the neighbourhood area. Georgian and Victorian buildings are prominent within parts of the town centre and surrounding streets, while twentieth century development introduced civic buildings, offices and infrastructure.
- 4.3 Castle Plus area shows 9,632 usual residents and a total of 4527 household spaces in the 2021 census. The largest proportion of residents fall within the working-age population between 25-60.
- 4.4 Both the River Lea and Mimram run through the area, with extensive flood plains, particularly where the two rivers merge. The River Mimram Corridor is subject to a proposed Local Landscape Designation (LLD) from its source near the village of Whitwell to Hertford (ending in Castle Plus Neighbourhood Plan Area). This chalk stream is an important feature of the Plan area and policies in the Plan are incorporated in anticipation that the LLD will be successful.
- 4.5 The Neighbourhood Plan does not allocate housing sites.
- 4.6 The Plan also fundamentally embraces sustainability in all its guises.
- 4.7 Both the natural and historic heritage of the Neighbourhood Area have been carefully considered through the preparation of the CPNP and the policies have been written specifically to take these assets into account.
- 4.8 The CPNP Area does not contain or border any sensitive sites of European significance (Natura 2000), although there are designated sites at Wormley Hoddesdon Park Woods (also a National Nature Reserve) and the Lee Valley Ramsar and SPA (also a SSSI), within 3km of the neighbourhood plan boundary. The neighbourhood plan area is within the outer reaches of the SSSI Impact Risk Zones of Hertford Heath SSSI and Amwell Quarry SSSI.
- 4.9 There are a number of Local Wildlife Sites and areas of Ancient Woodland in the neighbourhood plan area. These are detailed in **Appendix A: HERC Important Sites, Habitats and Species**
- 4.10 There is one Scheduled Monument within the CPNP Area, at Hertford Castle, described as one of the best preserved motte and bailey castles in southern Britain.

- 4.11 Hertford Conservation Area extends to the south; the area includes County Hall, some of the housing areas nearby including Hagsdell and Cole Green Way Farm. Much of the village of Hertingfordbury is designated as a separate conservation area.
- 4.12 Listed buildings and structures in the plan area include those located in the historic settlements of Hertford and Hertingfordbury, as well as the estate at Balls Park. More modern listed structures include County Hall and Morgans primary school. Four listed buildings are Grade I listed: Castle Walls and Gate House, Quaker Meeting House, Shire Hall and Balls Park.
- 4.13 Hertford Castle is a Locally Important Historic Park and Garden (see [East Herts Historic Parks and Gardens SPD 2007](#)). Balls Park is a Grade II Registered Historic Park and Garden. Bayfordbury and Panshanger Registered Parks are located just outside the neighbourhood plan boundary.
- 4.14 Hertfordshire County Council provided advice on other monuments on their records that might be suitable to add to the list of Non-designated Heritage Assets. These were considered along with other interesting buildings and structures noted by the NP Steering Group and buildings identified in the Hertford Conservation Area Appraisal and Management Plan 2017 as worthy of protection from demolition.
- 4.15 The Neighbourhood Plan's overall approach is to support appropriate development and protect the character of the built and natural environment of this urban part of Hertford and surrounding land and settlements.
- 4.16 The vision of the Neighbourhood Plan is:
- The Neighbourhood Plan Area should be a **safe** place to be, with **green** spaces, and biodiverse **green** and **blue** (rivers) infrastructure. Access for all types of active travel will be improved, making it easily **walkable** and **cyclable** in a **healthy** environment. Space for **healthy** activities and places for **socialising** will enhance the commercial and residential parts of the area. Attracting more residents and visitors to use a good balance of local shops and services will help the town to **thrive**. Conserving and enhancing **historic** features and ensuring quality of architectural design to highlight uniqueness.
- Underlying this vision is the aspiration for all new development to be **sustainable** and by focused and active intervention to improve the overall **sustainability** of the Neighbourhood Plan Area. This will achieve **a high quality of life across generations**.
- 4.17 The Neighbourhood Plan contains the following objectives, which are derived from the vision statement:

Overarching Objective

Objective DS1: All new development should be sustainable and improvements to existing sustainability credentials made through implementing policies and actions in this Plan

Green Spaces & Nature

Objective GN1: Protect existing green spaces and green corridors for recreation and leisure use

Objective GN2: Provide space for wildlife to thrive

Objective GN3: Improve the quality of blue infrastructure (rivers)

Community Facilities

Objective CF1: Improve access to community facilities to meet the current and future needs across all generations.

Objective CF2: Retain and enhance outdoor spaces for healthy activities and socialising

Living & Movement

Objective LM1: Ensure the design and layout of new housing creates a safe, attractive and sustainable living environment

Objective LM2: Provide realistic improvements to public transport, and enhance walking and cycling routes to encourage more use of sustainable modes of travel

Objective LM3: Support sustainable new housing locations

Heritage & Design

Objective HD1: Identify the significance of and protect valued heritage assets

Objective HD2: Enhance historic features through good architectural design

Objective HD3: Recognise importance of Townscape, Character Areas and Important Views

Business & Employment

Objective BE1: Maintain and enhance room for local small business, and employment opportunities to thrive

Objective BE1: Ensure the vitality and viability of Hertford Town Centre

Implementation and Monitoring

Objective IM1: Establish a robust monitoring and implementation framework

5. National Policy

- 5.1 The NPPF (Dec 2024) considers national environmental policy in relation to the CPNP. Paragraph 29 states “Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure and community facilities at a local level, establishing design principles, conserving and

enhancing the natural and historic environment and setting out other development management policies. More detail is provided below.

Historic Environment

- 5.2 Section 16 of the National Planning Policy Framework addresses the historic environment and heritage assets in local plans. For the purposes of this SEA Screening Report, the Neighbourhood Plan will be part of the Development Plan for East Herts and in this context, paragraph 203 of the NPPF provides useful guidance on what a positive strategy for this historic environment should comprise.
- 5.3 Paragraph 203 advises that local planning authorities should set out in their local plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. In doing so, they should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance. In developing this strategy, local planning authorities should take into account:
- a) the desirability of sustaining and enhancing the significance of heritage assets and assets, and putting them to viable uses consistent with their conservation;
 - b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
 - c) the desirability of new development making a positive contribution to local character and distinctiveness; and
 - d) opportunities to draw on the contribution made by the historic environment to the character of a place.
- 5.4 Paragraph 208 states that “Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal.”
- 5.5 Historic England provides guidance (Advice Note 8 2016) on the prediction and identification of significant effects and mitigation measures. In the context of the CPNP Area these can be summarised as:
- Loss of or damage to a heritage asset or its setting
 - Conservation and enhancement of a heritage asset
 - Loss or erosion of the historic character of the area
 - Impact on the ‘at risk’ status of assets or risk to the historic environment
 - Cumulative, secondary or synergistic impacts on heritage assets or the area
- 5.6 The guidance goes on to say that mitigation measures may include historic environment policy guidance and detailed historic characterisation studies. The Conservation Area Appraisal and Management Plan for Hertford is current but covers only a small part of the area, so heritage has featured significantly in the preparation of the Neighbourhood Plan,

from consideration of impact on the Scheduled Monument to the identification of Non-designated Heritage Assets.

Natural Environment

- 5.7 The NPPF also addresses the conservation and enhancement of the natural environment in planning policies and decisions. Paragraph 187 of the NPPF refers to protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils. It seeks to minimise impacts on and provide net gains for biodiversity including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs.
- 5.8 Paragraph 188 states that plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.
- 5.9 Paragraph 192 advises that to protect and enhance biodiversity and geodiversity, plans should:
- a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and
 - b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.
- 5.10 There are areas of Flood Zone 2 and 3 in the neighbourhood plan area, primarily relating to the River Mimram and River Lea. See Flood Map in

6. Local Policy

- 6.1 The East Herts District Plan was adopted on 23 October 2018. The policies relevant to the protection of heritage assets and the natural environment in the CPNP Area are listed as follows:

GBR1 Green Belt

VILL2 Group 2 VillagesHA1 Designated Heritage Assets

HA2 Non-Designated Heritage Assets

HA3 Archaeology

HA4 Conservation Areas

HA7 Listed Buildings

HA8 Historic Parks and Gardens

HA5 Shopfronts in Conservation Areas

NE1 International, National and Locally Designated Nature Conservation Sites

NE2 Sites or Features of Nature Conservation Interest (Non-Designated)

NE3 Species and Habitats

NE4 Green Infrastructure

WAT1 Flood Risk Management

WAT3 Water Quality & the Water Environment

- 6.2 All the above policies were taken into account throughout the preparation of the Neighbourhood Plan. This Neighbourhood Plan is in accordance with the strategic policies in East Herts District Plan and this will be further tested at the Examination of the Plan.
- 6.3 The Sustainability Appraisal for the East Herts District Plan was published in 2016, by AECOM. The development strategy was to concentrate development in or around the larger settlements in the district, where possible. The sustainability of this approach in terms of the natural and historic environment and the water environment was fully considered in the Sustainability Appraisal. There are two housing sites allocated in the CPNP area, Policy HERT2 (Mead Lane Area) and Policy HERT5 (South of Hertford), the first of which is under construction and the second of which is complete. There are no housing sites proposed for allocation in this Neighbourhood Plan.
- 6.4 In October 2023, East Herts Council agreed to update the adopted District Plan (2018). Currently, the Council is updating the evidence base and undertaking other preparatory work needed to support the New Local Plan. Now the Government has published the Local Planning Regulations (2026), the Council plan to give notice in June 2026 to commence formal work on the New Local Plan this year.

Castle Plus Neighbourhood Plan

- 6.5 Specific natural and historic environment policies in the Neighbourhood Plan include:
- Policy CPGN1 Local Green Space
 - Policy CPGN2 Wildlife Corridors
 - Policy CPGN3 The River Mimram/Lea Corridor
 - Policy CPGN4 Biodiversity and Ecological Connectivity
 - Policy CPCF2 Protected Recreational Open Spaces
 - Policy CPHD1 Designated Heritage Assets
 - Policy CPHD2 Non-designated Heritage Assets
 - Policy CPHD3 Character Areas
 - Policy CPHD4 Important Views
 - Policy CPHD5 Traditional Shopfront Design
 - Policy CPHD6 Buildings Heights in the Conservation Area
- 6.6 Other policies have criteria with an environmental purpose:
- Policy CPLM1 Future Proofing Sustainable Homes

7. Screening assessment

7.1 The first stage of a screening assessment in the [Practical Guide to the Strategic Environmental Assessment Directive](#) utilises a simple table (Table 1 below).

Table 1 Application of the SEA Directive

Stage	Yes/No	Assessment
1. Is the NP 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))	Yes	The preparation of and adoption of the Neighbourhood Development Plan is allowed under the Town and Country Planning Act 1990 as amended by the Localism Act 2011. The Neighbourhood Plan is being prepared by the Castle Plus Neighbourhood Plan Steering Group, a working group who report to the Hertford Town Council (as the “relevant body”) and will be “made” by East Herts District Council as the local authority.
2. Is the NP required by legislative, regulatory or administrative provisions? (Art. 2(a))	No	Whilst the Neighbourhood Development Plan is not a requirement and is optional under the provisions of the Town and Country Planning Act 1990 as amended by the Localism Act 2011, it will, if “made”, form part of the Development Plan for the District. It is therefore important that the screening process considers whether it is likely to have significant environmental effects and hence whether SEA is required under the Directive.
3. Is the NP 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))	No	The Castle Plus Neighbourhood Plan is prepared for town and country planning and land use and will not set out a framework for future development of projects that would require an EIA.
4. Will the 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))	No	See the Habits Regulations section of this report.
5. Does the NP 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)	No	There are no site allocations in the Neighbourhood Plan. It does however allocate Local Green Spaces as a protective measure.
6. Does the Neighbourhood Plan set the framework for	No	The Neighbourhood Plan includes policies which will guide development and assist the LPA with the

Stage	Yes/No	Assessment
future development consent of projects (not just projects in annexes to the EIA Directive)? (Art 3.4)		determination of planning applications. It does not set a framework for specific on identified sites development.
7. Is the 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)	No	Not applicable
8. Is it likely to have a significant effect on the environment? (Art. 3.5)	No	Table 2 contains an assessment of the likely significant effects on the environment. Castle Plus Neighbourhood Plan is not likely to have significant effects on the environment. The Strategic Environmental Assessment Directive does not require SEA.

7.2 As mentioned above, the Regulations specify a set of criteria against which the likely environmental effects of any plan covered by the Regulations must be assessed to determine whether it requires a SEA. The table below considers each of these criteria in turn.

Table 2: Assessment of likelihood of significant effects on the environment

Criteria for determining the likely significance of effects	Likely to have significant effects?	Justification for assessment
<i>1 (a) the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources</i>	No	<i>The Neighbourhood Plan will form part of the Statutory Development Plan and therefore would set a framework for future development projects in Castle Plus. However, the Neighbourhood Plan sits within a wider framework set out by the National Planning Policy Framework (NPPF), and East Herts District Plan. No sites are identified for development.</i>
<i>1 (b) the degree to which the plan or programme influences other plans or programmes including those in a hierarchy.</i>	No	<i>The Neighbourhood Plan will sit alongside the statutory development plan and provide a greater degree of detail to</i>

Criteria for determining the likely significance of effects	Likely to have significant effects?	Justification for assessment
		<i>complement East Herts District Plan policies, as they relate to the CPNP Area. However, the Neighbourhood Plan will respond to and align with rather than influence other plans or programmes.</i>
<i>1 (c) the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development</i>	No	<i>The Neighbourhood Plan aims to secure sustainable development in accordance with national and local policy utilising locations close to active travel options.</i> <i>It will work to protect and enhance the character, natural environment and landscape of the CPNP Area, including statutory environmental designations and Local Green and Blue Space designations. Therefore, it is considered that the Neighbourhood Plan will have a positive impact on local environmental assets.</i>
<i>1(d) environmental problems relevant to the plan</i>	No	<i>The environmental assets in the neighbourhood plan area have been detailed in the chapters above and in the Appendices. The Neighbourhood Plan seeks to address any issues that may occur with these assets through the policies. No problems have been identified relevant to this plan. The Neighbourhood Plan will help to address wider environmental problems as highlighted in the NPPF at a local level, such as climate change, air pollution, traffic congestion and loss of biodiversity; without any negative effects.</i>

Criteria for determining the likely significance of effects	Likely to have significant effects?	Justification for assessment
<i>1 (e) the relevance of the plan or programme for the implementation of community legislation on the environment (e.g. plans and programmes linked to waste management or water protection)</i>	No	<i>The Neighbourhood Plan complies with the East Herts planning documents and the NPPF which have taken account of existing legislation for environmental protection.</i>
<i>2 (a) the probability, duration, frequency and reversibility of the effects</i>	No	<i>No significant effects have been identified. The Neighbourhood Plan will result in positive environmental effects through policies that seek to protect important heritage assets including views; and have positive social and economic effects by ensuring ongoing support for community, leisure and business facilities and promoting walking and cycling. These positive effects are small and low frequency but are likely to be long term.</i>
<i>2 (b) the cumulative nature of the effects</i>	No	<i>No significant effects have been identified. A combination of the Neighbourhood Plan, which seeks to protect and enhance the historic and natural environment of Castle Plus and wider environmental policy in the East Herts District Plan is likely to have cumulative positive environmental effects and benefits for the area. The effects of the Neighbourhood Plan will generally be small scale.</i>
<i>2 (c) the trans-boundary nature of the effects</i>	No	<i>Efforts have been made to consider how improvements in Castle Plus could be followed through over the boundary into other wards in Hertford, Hertford</i>

Criteria for determining the likely significance of effects	Likely to have significant effects?	Justification for assessment
		<i>Heath Parish and the adjoining town of Ware.</i>
<i>2 (d) the risks to human health or the environment (e.g. due to accidents)</i>	No	<i>No significant effects have been identified</i>
<i>2 (e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)</i>	No	<i>No significant effects have been identified. The Neighbourhood Plan aims to enhance the environment and to provide the infrastructure required to meet the social needs of residents.</i>
<i>2 (f) the value and vulnerability of the area likely to be affected due to:</i> <i>(i) special natural characteristics or cultural heritage</i> <i>(ii) exceeded environmental quality standards</i> <i>(iii) intensive land-use</i>	No	<i>The Neighbourhood Plan area does contain sensitive features. Design, heritage and environmental policies aim to protect and enhance the natural and historic environment.</i> <i>The following specific policies (prefixed by 'CP protect sensitive features:</i> <i>DS1, GN1, GN2, GN3, GN4, CF1, CF2, LM1, LM3, HD1, HD2, HD3, HD4, HD5, HD6.</i> <i>East Herts planning policies and the NPPF will also protect natural assets, listed and unlisted heritage assets and designated assets contained within the boundary of the CPNP.</i>
<i>2 (g) the effects on areas or landscapes which have a recognised national, community or international protection status</i>	No	<i>The Neighbourhood Plan is not proposing to allocate sites and contains policies aimed at protecting local Green Spaces and Local Wildlife Sites and in addition the following specific policies protect sensitive features of community interest: GN1, 2, 3 and 4.</i>

8. Screening determination

- 8.1 As mentioned above, SEA is more likely to be necessary if:
- a Neighbourhood Plan allocates sites for development
 - the Neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan
 - the Neighbourhood Plan is likely to have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan.
- 8.2 The NP does not allocate sites for development.
- 8.3 The CPNP Area contains sensitive features, including wildlife sites, ancient woodland, conservation areas, listed and scheduled heritage features. The Neighbourhood Plan policies aim to protect and enhance these features and so they are not impacted negatively by the proposals in the Neighbourhood Plan.
- 8.4 The NP will not have significant environmental effects which have not already been considered.
- 8.5 **In conclusion the Castle Plus Neighbourhood Plan will not have significant environmental effects for which a SEA would be required.**

9. Habitat Regulations Assessment (HRA) Screening

- 9.1 Under the Conservation of Habitats and Species Regulations 2017, it is important to assess a neighbourhood plan through the habitat regulations process to look at the potential for significant impacts on nature conservation sites that are of European Importance. As set out above there are no Nature 2000 sites within the neighbourhood area, but there are some internationally protected sites close to the neighbourhood plan boundary:

- Wormley-Hoddesdon Park Wood (SAC)- approx. 2.4 km from NP boundary
- Lee Valley SPA and Ramsar (Rye Meads and Amwell Quarry)- approx. 2.3 km from NP boundary
- Epping Forest SAC- approx. 14km from NP boundary

These sites have been mapped for completeness. See **Appendix C: Natura 2000 Sites**

- 9.2 Pressures on sensitive internationally protected sites might include pressure from over use for recreation, atmospheric pollution and water abstraction/water quality. The Neighbourhood Plan does not allocate site but has policies dealing with these issues.

Recreational Pressure

- 9.3 The Neighbourhood Plan contains policies relating to the retention of recreational space and the safeguarding of green spaces within the area. This is considered to have a positive effect, for instance in redirecting people away from the sensitive internationally designated sites for recreational purposes.

Atmospheric Pollution

- 9.4 The Neighbourhood contains policies which seek to mitigate the impacts of climate change and improve air quality. It promotes opportunities for walking and cycling, welcomes the initiatives in the Local Cycling and Walking Plan, and encourages the provision of public transport to reduce reliance on private car use, all reducing emissions.

Water Abstraction and Water Quality

- 9.5 Flood Zones 2 and 3 are present within the Neighbourhood Plan Area, associated with the floodplain of the River Lea, River Mimram and their tributaries. The Neighbourhood Plan encourage water conservation, ground water management, and has policies to safeguard and enhance green and blue infrastructure.

Conclusion

- 9.6 **In conclusion, given that the Neighbourhood Plan does not contain any site allocations and considering the above commentary, it is unlikely to trigger the need for an HRA (Appropriate Assessment).**

Appendix A: HERC Important Sites, Habitats and Species

This data sheet contains a summary of the HERC Data Search Results for Castle Plus Neighbourhood Plan area.

Ancient Woodland

Great Stock Wood and Terrace Wood are classified as Ancient Semi-natural Woodland (ASNW). They retain a native tree and shrub cover that has not been planted, although it may have been managed by coppicing or felling and allowed to regenerate naturally. This covers all stands of ancient woodland which do not obviously originate from planting.

Herts and Middlesex Wildlife Trust nature Reserve

Willow Mead Reserve is a locally rare wet woodland bordering the River Mimram (chalk stream), and accessible at the corner of Becketts estate where a river path leads to a gated entrance. It extends to 1.5 hectares. It provides a wider area through which a vital wildlife corridor runs. Further details can be found in the Nature Annex to the Neighbourhood Plan.

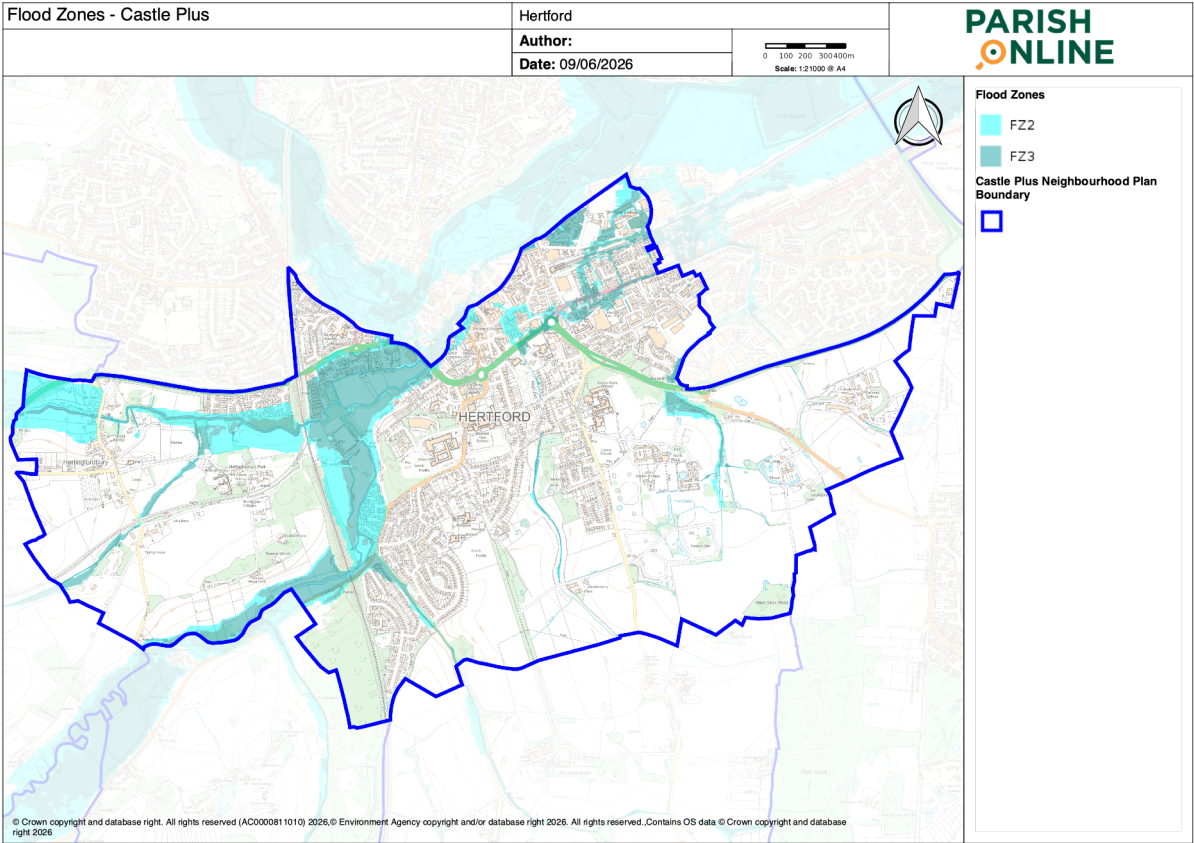
Local Wildlife Sites

There are 13 Local Wildlife Sites which are summarised below:

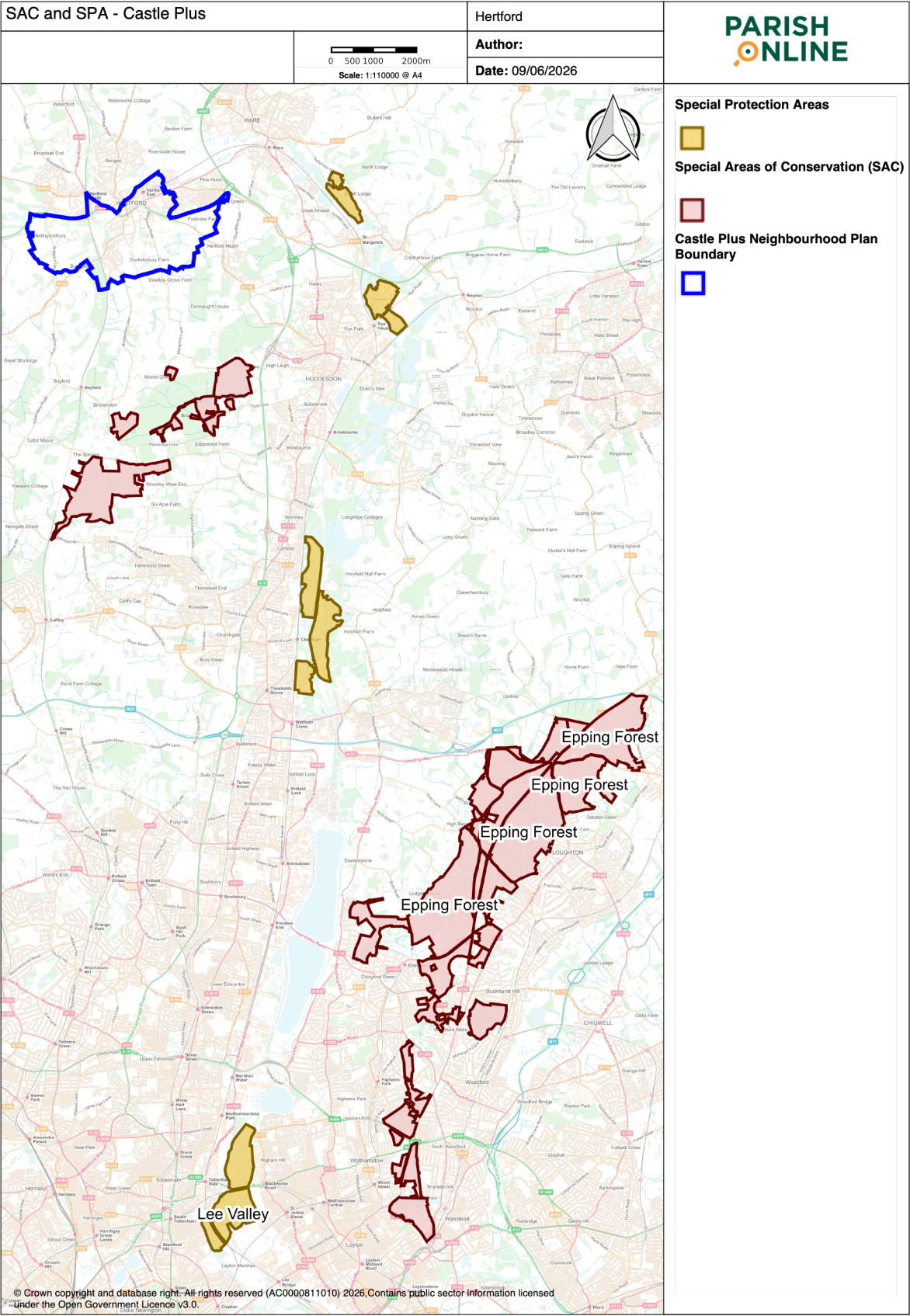
- Cole Green Way (HERC ref 58/006)- disused railway line supporting areas of species rich grassland, secondary woodland and scrub. (*Glow worms also known to be present*).
- Hertingfordbury Park Lower Pastures (HERC ref 59/004)- series of low lying neutral grassland adjacent to the River Mimram supporting fen and swamp indicators.
- Great Stock Wood (HERC ref 59/009) ancient semi-natural Oak/Hornbeam woodland with ponds.
- Meadow and River Lee by Leahoe Viaduct northwest (HERC ref 59/011)- important area of species diverse unimproved acid/neutral grassland by the River Mimram. Some large trees and an old hedgerow. The river is important for otter, water voles and grass snakes.
- Terrace Wood (HERC ref 59/013) Ancient semi-natural Oak/Hornbeam woodland with scattered ponds.
- Balls Park (HERC Ref 59/019)- Old parkland supporting species rich semi-improved neutral to acid grassland. Great crested newts and grass snakes present.
- Willowmead (HERC ref 59/037) Nature Reserve bordering the River Mimram supporting mature riparian wet alder woodland with willow carr and tall fen swamp habitat below. The site is good for fungi and mosses.
- St Mary's Churchyard, Hertingfordbury (HERC Ref 59/058) -moderately diverse semi-improved neutral grassland supporting a range of fine grasses and herbs. Meadow Saxifrage has been recorded. Numerous yew trees present.
- All Saint's Churchyard, Hertford (HERC Ref 59/063)-rough semi-improved neutral grassland with mature planted trees and bordering walls. Rue-leaved saxifrage- an uncommon Hertfordshire species has been recorded.
- Balls Park pond (59/107) Pond and environs important for protected species (*great crested newts*)
- Riversmeet Area (59/108) Building and environs important for protected species (bats)
- Valley Close Area (59/111) Building and environs important for protected species (*bats*)
- Mimram Road Ditch and Wasteground (59/117) Important for protected species- water voles, slow-worm and grass snake.

Other habitats include those qualifying as Priority habitat under section 41 of the NERC Act 2006. These include S41 Priority broadleaf woodland and S41 wet grassland/swamp.

Appendix B: Flood Zone Map



Appendix C: Natura 2000 Sites



Further Information on Designated Sites

Special Area of Conservation (SAC)

Special Areas of Conservation (SAC's) are areas designated to protect particular habitats, plants and species, these areas are designated under the Conservation of Habitats and Species Regulations 2017 (as amended). Within East Herts the Wormley-Hoddesdonpark Woods SAC is designated for its representation of Sub-Atlantic and medio-European oak or oak-hornbeam forests.

Special Protection Area (SPA)

Special Protection Areas (SPA's) are internationally designated areas, that have been identified as areas of international importance for breeding, feeding, wintering and the migration of rare and vulnerable migratory bird species under the Conservation of Habitats and Species Regulations 2017 (as amended). Four areas within the district are classified under the Lee Valley SPA, this includes Rye Meads and Amwell Quarry. The Lee Valley SPA spans from London and Hertfordshire and includes a mosaic of important wetland habitat for bird conservation across the region.

Ramsar Sites

Ramsar Sites are wetlands of international importance that have been designated to protect the biological and physical features of wetlands, these have been designated under the Ramsar Convention (1971) – Wetlands of International Importance. Within the district Rye Meads and Amwell Quarry which form components of the Lee Valley Ramsar Site, this site overlaps the Lee Valley SPA.

Sites of Special Scientific Interest (SSSI)

Sites of Special Scientific Interest (SSSI) is land notified under the Wildlife and Countryside Act (1981) (as amended), sites are designated by Natural England. Sites are designated for their characteristics that support rare and endangered species, habitats and natural features. All of the internationally designated sites within the district are also designated as SSSI's.

National Nature Reserves (NNR'S)

National Nature Reserves (NNR's) are areas managed for either (or both) the preservation of flora, fauna, geological and physiological features of special interest or to provide opportunities to study flora, fauna and their physical conditions. An NNR is land declared under the National parks and Access to the Countryside Act 1949 or Wildlife and Countryside Act 1981, sites are selected by Natural England that meet certain criteria. Broxbourne Wood NNR lies to the south of the district and forms part of the only NNR in Hertfordshire, it contains several woodlands of SSSI status, which are home to many rare and scarce woodland wildlife.

Details of the three Natura 2000 Sites

Lee Valley SPA

The Lee Valley Park offers a natural resource of international, national, regional and local importance. There are eight Sites of Special Scientific Interest (SSSIs) in the Regional Park, four of these, Amwell Quarry, Rye Meads, Turnford and Cheshunt Pits and Walthamstow Reservoirs form the Lee Valley Special Protection Area and Ramsar site. The Amwell Quarry Site of Special Scientific Interest (SSSI) within the Lee Valley Regional Park, is located just beyond the south-eastern boundary (240m) of the neighbourhood area. Rye Meads SSSI is located 3km from the neighbourhood area boundary.

The entire SPA/ Ramsar site comprises a series of embanked water supply reservoirs, sewage treatment lagoons, and former gravel pits extending along about 24km of the valley from near Ware southward to Finsbury Park in London. These water bodies support internationally important numbers of wintering Gadwall and Shoveler (Criterion 6) and nationally important numbers of several other bird species.

The site also contains a range of wetland and valley bottom habitats, both humanmade and semi-natural, which support a diverse array of wetland fauna and flora. Four SSSIs are included within the site. Virtually all parts of the site are subject to management plans in which nature conservation is a high or sole priority. Potential threats from eutrophic condition of the water, over-abstraction of surface water for public supply in periods of drought, and urban development pressures are felt to be addressed by several directives and regulations. Nonconsumptive recreational activities are important and mostly well regulated.

Wormley-Hoddesdonpark Woods SAC

Wormley-Hoddesdonpark Woods is one of two outstanding examples in England of a type of oak-hornbeam forest mainly found in central Europe. Sessile and pedunculate oaks are key components of the canopy. Hornbeam is mixed with oaks and other trees in areas of high forest and is also present as almost pure stands of stored coppice, some of which are being brought back into a coppice cycle. Over 95% of the site is ancient woodland. It includes areas of wood-pasture and many veteran pollards and coppice stools. Distinctive features of the ground flora include stands of great wood-rush and an unusual moss community more typical of continental Europe.

Epping Forest SAC

Epping Forest lies to the east and north-east of London, just inside the M25. It has great significance for its:

- Heritage - as a former Royal Forest
- Recreation - as one of the largest open spaces around London, providing significant open space opportunities for residents from within several London Boroughs, Epping Forest District and attracting visitors from beyond these areas
- Wildlife - two thirds (1728ha) of the Forest's 2400 hectares is designated as a Site of Special Scientific Interest (SSSI) with 1,605ha of that area also designated as a Special Area of Conservation (SAC). It is one of the largest remaining wood-pastures in the UK, a habitat of 'principal importance' (Section 41 of the Natural Environment and Rural Communities Act 2006) and, as recorded in the SSSI citation, and is the only protected site to support all three types of lowland wood-pasture. Furthermore, the Forest's wood pasture contains the largest population of ancient, pollarded trees in the country.

Laura Guy

From: HNL Sustainable Places <HNLsustainablePlaces@environment-agency.gov.uk>
Sent: 19 June 2026 09:21
To: Laura Guy; strategic.planning@eastherts.gov.uk
Subject: [External] Castle Plus Neighbourhood Plan
Attachments: HNL NP advice note.pdf

Dear Planning Policy Team,

Thank you for consulting us on the Neighbourhood Plan consultation for Castle Plus Neighbourhood Plan.

We have had to prioritise our limited resource and focus on strategic plans where the environmental risks and opportunities are highest. We attach our advice note which sets out our substantive response to Neighbourhood Plan consultations including Strategic Environmental Assessment screening and scoping.

We recognise that Neighbourhood Plans provide a unique opportunity to deliver enhancements to the natural environment at the local level. This advice note sets out the key environmental issues, within our remit, which should be considered. It also references sources of data you can use to check environmental features.

We hope this is helpful as you prepare evidence and the Neighbourhood Plan itself.

If you have any feedback, please let us know.

Kind regards,

Luke Senechal | Planning Advisor

Sustainable Places | Hertfordshire and North London

HNLsustainablePlaces@Environment-Agency.gov.uk



Environn
Agency

For homes and habitats



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Hertfordshire and North London Neighbourhood Plan Advice Note

Updated: June 2021

Neighbourhood Plans provide a unique opportunity to deliver enhancements to the natural environment at the local level. This document sets out the key environmental issues, within our remit, which should be considered.

We have had to prioritise our limited resource and focus on strategic plans where the environmental risks and opportunities are highest. This advice note sets out our substantive response to Neighbourhood Plan consultations including Strategic Environmental Assessment screening and scoping.

Together with Natural England, English Heritage and Forestry Commission we have published joint advice on neighbourhood planning which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at: <https://neighbourhoodplanning.org/toolkits-and-guidance/consider-environment-neighbourhood-plans/>

Drawing up a neighbourhood plan is a fantastic opportunity to build community resilience to climate change and make the local natural environment better. Opportunities include:

- New green spaces and improvements to public space through new development. This could include planting trees, creating rainwater gardens or enhancing local waterways for water quality and biodiversity.
- Recognising the value of certain environmental features within a plan area, e.g. a floodplain, wetland habitat or rivers. Identify these features and outline how you intend to protect them and improve them.
- Helping a community to manage and adapt to the risk of flooding and climate change by incorporating natural features and green space to manage and store water, and supporting the use of sustainable drainage systems (SuDS).
- Promoting energy and water efficiency measures for new builds. These measures will reduce the cost of construction for developers and help to reduce utility bills for future occupiers. This will also help reduce unsustainable water consumption and carbon emissions.

We also recommend your Plan takes account of relevant Local Planning Authority's policies, plans and strategies including Local Planning Authority's Strategic Flood Risk Assessment, flood risk strategies (<https://www.gov.uk/government/collections/flood-risk-management-current-schemes-and-strategies>), and the Thames River Basin Management Plan (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/289937/geth0910bswa-e-e.pdf) as appropriate.

customer service line
03708 506 506

incident hotline
0800 80 70 60

floodline
03459 88 11 88

The information below explains the key issues we would consider in reviewing your Plan. We aim to reduce flood risk, while protecting and enhancing the water environment.

Infrastructure Delivery

We recommend that environmental infrastructure, including habitat enhancements, water storage areas, and green space, is taken into account if the Plan looks to fund local infrastructure.

Flood risk

Development must be safe and should not increase the risk of flooding.

Neighbourhood Plans should conform to national and local policies on flood risk:

If a Neighbourhood Plan is proposing sites for development please check whether there are any areas of Flood Zones 2 or 3 within the proposed site allocations. You can view a site's flood zone on the Flood Map for Planning on our website: <https://flood-map-for-planning.service.gov.uk/>

If the proposed allocation is located within Flood Zone 2 or 3 you should consult the Flood Risk and Coastal Change pages of the National Planning Policy Guidance (NPPG):

<http://planningguidance.communities.gov.uk/blog/guidance/flood-risk-and-coastal-change/>.

Here you can determine whether the flood risk vulnerability of the proposed development and the flood zone are compatible. In accordance with national planning policy the Sequential Test should be undertaken to ensure development is directed to the areas of lowest flood risk taking into account climate change. This should be informed by the Environment Agency's Flood Map for Planning and the Local Planning Authority's Strategic Flood Risk Assessment (SFRA), if they have one. We recommend you contact the Local Planning Authority to discuss this requirement further.

If the Neighbourhood Plan proposes development in flood risk areas, the Strategic Environmental Assessment should include baseline information about the flood risks, and include it as a key sustainability issue and as an objective.

We would have concerns if development is allocated in this high risk flood zone without the Sequential Test being undertaken. It is important that your Plan also considers whether the flood risk issues associated with these sites can be safely managed to ensure development can come forward.

We can provide any flooding information which we have available – such as predicted flood levels and historical flood data. Please note that there may be a charge for this information. Please contact our Customers and Engagement Team at HNLequiries@environment-agency.gov.uk for further details. In addition to the above you should also check with the Local Planning Authority's Neighbourhood Planning team with regards to other sources of flooding (such as surface water, groundwater, sewers and historic flooding) as detailed in their Strategic Flood Risk Assessment (SFRA). The Lead Local Flood Authority (LLFA), now has responsibility for local flood risk management and may hold flooding information that is not identified on our Flood Map.

Climate Change Allowances

The Local Authority's Strategic Flood Risk Assessment should indicate the extent of flood zones with likely climate change. On 19 February 2016, we published new guidance for planners and developers on how to use climate change allowances: <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

Flood Defences

Areas of your Neighbourhood Plan area, or proposed sites, may be given protection by a flood defence/alleviation scheme. Where this is the case the Plan should acknowledge this and identify the level of protection provided (including any climate change allowance). It should be noted that flood defences are intended to protect existing properties and are not to facilitate new development in areas that would otherwise be impacted by flooding. Any assessment of development behind flood defences should consider the impacts of a breach or overtopping. Where it is determined that new development should be behind a flood defence financial contributions may be sought to maintain or improve the structure.

Thames Estuary 2100 (Tidal Defences)

In line with requirements set out in the Thames Estuary 2100 (TE2100) plan, developments in this location will need to demonstrate how the flood defence could be raised in the future to meet the demands of climate change.

No activities on site should preclude access to the flood defence from maintenance or prevent the future raising of flood defences. In some cases we hold technical drawings of flood defence structures which may be of use. To request these you should contact our Customers and Engagement Team at hnlquiries@environment-agency.gov.uk.

Ecology and Water Management

Proximity to watercourse/ Ecology

Main rivers can be viewed on the Environment Agency's map:

<https://environment.maps.arcgis.com/apps/webappviewer/index.html?id=17cd53dfc524433980cc333726a56386>

The neighbourhood plan should draw upon evidence of designated or non-designated sites of nature conservation sites of international, national or local importance, and seek to ensure these sites are safeguarded and there is no degradation to these sites. The mitigation hierarchy of avoid mitigate and compensate should be followed to ensure this.

In accordance with national policy, any development proposal should avoid significant harm to biodiversity and seek to protect and enhance it; delivering **biodiversity net gain**. The forthcoming Environment Bill will mandate when enacted the demonstration of a minimum 10% biodiversity net gain using the Defra Biodiversity Metric 2.0 (or subsequent version), even where development proposals do not result in biodiversity loss. The Neighbourhood Plan could identify opportunities to incorporate requirements for achieving biodiversity and wider environmental net gains.

The provision of green infrastructure, particularly along rivers, can bring about benefits for people and wildlife. Creating networks of green space and habitats can also ensure wildlife are able to migrate and move across sites more easily enabling recovery and resilience of different wildlife species. The Neighbourhood Plan could play a role in helping to preserve, safeguard and establish green buffer zones along rivers by including policies or design guidance for their area. Even where buffer zones do not currently exist it is becoming more vital that we create them not just for the benefit of biodiversity but to reduce flood risk and increase our resilience to climate change.

This is a key way in which we can carry out our legal duty to further and promote the ecological and landscape value of rivers and land associated with them. In urban areas, in particular, rivers have often been degraded by past development, and we expect that any new development should go some way to redress the balance.

Neighbourhood Plans provide an opportunity to promote river restoration and enhancements helping us all to achieve the targets to improve waterbodies as part of the Water Framework Directive (WFD). There should be no deterioration in water quality and development should bring about improvements to the ecological status of any water body. Local WFD catchment data for the rivers in your area can be obtained from: <http://environment.data.gov.uk/catchment-planning/RiverBasinDistrict/>. We have identified WFD action measures for specific locations or whole reaches of watercourse (e.g. river bank restoration, improving fish passage, etc) and can be obtained from hnl.enquiries@environment-agency.gov.uk on request.

Objectives to achieve WFD improvements across all sectors are outlined in the Thames River Basin Management Plan (RBMP) (<https://www.gov.uk/search?q=River+Basin+Management+Plans>).

An assessment of the potential impacts of the Neighbourhood Plan on watercourses under WFD should be included within the SEA/SA appraisal, making use of the datasets available above.

Groundwater Quality

Development must not cause pollution to the water environment.

Aquifers and Source Protection Zones

Some of your local area, and specific potential site allocations, may be located upon or within aquifers and Source Protection Zones (link below). SPZ 1 is especially sensitive. You might consider these within your Plan and when allocating sites. The relevance of the designation and the potential implication upon development proposals should be seen with reference to our Groundwater Protection guidance:

<https://www.gov.uk/government/collections/groundwater-protection>

To see if a proposed development is located within a Source Protection Zone, please use our online map:

<https://www.gov.uk/guidance/groundwater-source-protection-zones-spzs>

Land Contamination

You must consider land contamination when preparing your plan. Managing it during development is key to addressing past contamination and preventing further impacts during development.

You can establish if a site may be contaminated in several ways. Your Local Authority may hold a register of sites it knows to be contaminated. A list of potentially contaminated sites can be accessed on the following link:

<https://www.clare.co.uk/useful-government-legislation-and-guidance-by-country/76-key-documents/198-doe-industry-profiles>

We recommend you contact your Local Authority's Environmental Health team who may hold records on known/potential land contamination. Please note our primary concern is with regards to water quality. Your Local Authority's Environmental Health team will advise you on issues related to human health.

Your plan may include areas which are located on aquifers and Source Protection Zones. These areas represent the most sensitive and highest risk in terms of potential pollution to protected groundwater supplies, some of which are used for drinking water. These should be considered within your plan if growth or development is proposed here. Further information can be accessed on the following links:

Guiding principles for the Land Contamination

<https://www.clare.co.uk/useful-government-legislation-and-guidance-by-country/192-guiding-principles-for-land-contamination-gplc>

customer service line
03708 506 506

incident hotline
0800 80 70 60

floodline
03459 88 11 88

Approach to Groundwater Protection:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/692989/Environment-Agency-approach-to-groundwater-protection.pdf

Water supply and foul drainage

When allocating sites in your Plan, you will need to consider if the water supply and foul drainage infrastructure can accommodate the development. Your local water company can provide further information about water supply and sewerage capacity. Our '[Water Stressed Areas – final classification](#)' 2013 explains that our area is seriously water stressed. This is particularly significant as population numbers rise and there are increased impacts from climate change on water resource availability and reliability. The Neighbourhood Plan should consider what further measures could help the local area achieve water sustainability that are not already in the Local Plan, water efficiency standards and measures including the retrofitting of existing buildings.

Surface water drainage

The inclusion of Sustainable Drainage Systems (SUDS) should always be a consideration within any development to reduce the risk of surface water flooding on and off site. The Lead Local Flood Authority, is the main contact for SUDS issues. However, we have interest in SUDS from a groundwater protection perspective and improving water quality.

The collection and dispersal of clean surface water to ground to recharge aquifer units and prevent localised drainage or surface systems flooding in heavy rainfall is encouraged. However, dispersal into the ground through soakaways or other infiltration systems requires a site-specific investigation and risk assessment. Generally, we would accept roof drainage going to soakaway (or other systems), but other surface drainage may need to go through treatment systems or to foul main, for instance vehicle parking. Infiltrating water has the potential to cause mobilisation of contaminants present in shallow soil/made ground which could ultimately cause pollution of underlying groundwater resources. Where contamination is known or suspected, remedial or other mitigating measures will likely be required so that it can be demonstrated that there is no resultant unacceptable risk to Controlled Waters.

We advise applicants to follow our guidance – Groundwater Protection. This is a report that highlights the importance of groundwater and encourages industry and other organisations to act responsibly and improve their practices. This can be found at: <https://www.gov.uk/government/collections/groundwater-protection>

The design of the drainage systems should be in line with G1, G9, G12 and G13 position statements: <https://www.gov.uk/government/publications/groundwater-protection-position-statements>

Please note

This document is a response to a Neighbourhood Plan consultation and does not represent our final view in relation to any future planning application made in relation to any site. You should seek your own expert advice in relation to technical matters relevant to your neighbourhood plan before submission.

If you have any questions please contact the Hertfordshire and North London Sustainable Places team: HNL SustainablePlaces@environment-agency.gov.uk

customer service line
03708 506 506

incident hotline
0800 80 70 60

floodline
03459 88 11 88

Laura Guy

From: McGivern, Ross [REDACTED]
Sent: 08 July 2026 16:01
To: Laura Guy
Subject: [External] PL00802280 Hertford Castle Plus Neighbourhood Plan SEA Screening Opinion

Dear Laura,

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

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

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

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

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

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

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

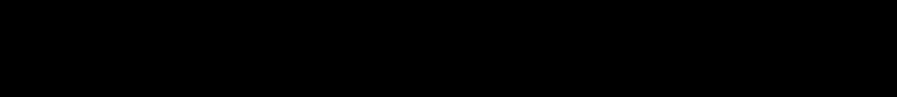
Please do contact me, either via email or the number below, if you have any queries.

Kind regards,
Ross

Ross McGivern (he/him)

Historic Places Adviser | Partnerships Team | East of England

Historic England, 24 Brooklands Avenue, Cambridge CB2 8BU



Ensuring our heritage lives on and is loved for longer.

historicengland.org.uk

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Date: 21 July 2026
Our ref: 551294
Your ref: Castle Plus Neighbourhood Plan



Ms Laura Guy
East Herts District Council

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

BY EMAIL ONLY

T 0300 060 3900

Dear Ms Guy

Castle Plus Neighbourhood Plan - SEA/HRA Screening Consultation

Thank you for your consultation on the above dated and received by Natural England on 17 June 2026.

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

Screening Request: Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA)

It is Natural England's advice, on the basis of the material supplied with the consultation, that:

- **significant effects on statutorily designated nature conservation sites or landscapes are unlikely; and,**
- **significant effects on Habitats sites¹, either alone or in combination, are unlikely.**

The proposed neighbourhood plan is unlikely to significantly affect any Site of Special Scientific Interest (SSSI), Marine Conservation Zone (MCZ), Special Areas of Conservation (SAC), Special Protection areas (SPA), Ramsar wetland or sites in the process of becoming SACs or SPAs ('candidate SACs', 'possible SACs', 'potential SPAs') or a Ramsar wetland. The plan area is unlikely to have a significant effect on a National Park, Area of Outstanding Natural Beauty or Heritage Coast, and is unlikely to impact upon the purposes for which these areas are designated or defined.

Guidance on the assessment of Neighbourhood Plans, in line with the Environmental Assessment of Plans and Programmes Regulations 2004 is contained within the [Planning Practice Guidance](#). This identifies three triggers that may require the production of an SEA:

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

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent

¹ Habitats sites are those referred to in the [National Planning Policy Framework](#) (Annex 2 - glossary) as "any site which would be included within the definition at regulation 8 of the Conservation of Habitats and Species Regulations 2017 for the purpose of those regulations, including candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation, Special Protection Areas and any relevant Marine Sites".

as to require an SEA. Further information is included in Natural England's [standing advice](#) on protected species.

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant an SEA. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission [standing advice](#).

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a SEA is necessary.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If a SEA is required, Natural England must be consulted at the scoping and environmental report stages.

Please send any new consultations, or further information on this consultation to consultations@naturalengland.org.uk

Yours sincerely

Sally Wintle
Consultations Team