



Neighbourhood Development Plan Steering Group

Holton-le-Clay
Neighbourhood
Development Plan
Basic Conditions
Statement
1 December 2017

Updated January & August 2020

Revision History

Revision	Date	Comments	Author	Approved
0.1	24/4/16	Presented to ELDC Planning Policy	Bob Bolton	
0.2	27/5/16	Amend and Address ELDC Comments	Barry Clifton	
0.3	22/11/17	Final amendments following consultations & feedback.	Bob Bolton	
0.4	January 2020	Examiner Recommendations	Clive Keble	
0.5	August 2020	Amendments following feedback from ELDC	Bob Bolton	

Update 0.4 is presented in a extended Section 7 and a new section 8, with others changes in the main body of the text to include a Designated Neighbourhood Area Map, an amended Plan period, a revised Table 1 incorporating the new (2019) NPPF and reference to the ELDC Screening Opinion, including a copy of that document as Appendix 1 .

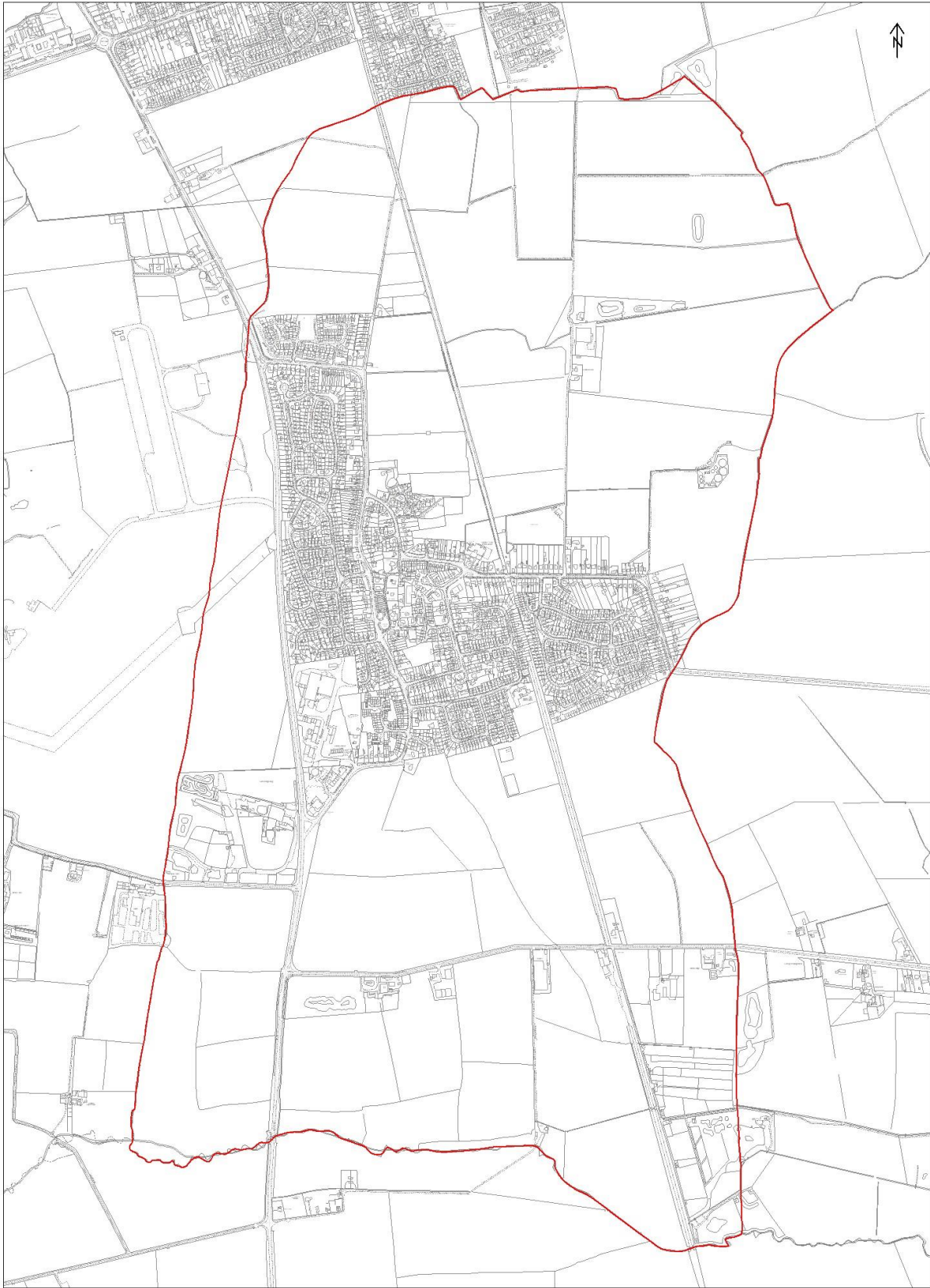
The changes are based on the comments and recommendations made by the Examiner and taking account of the revised NPPF (2019) and the 2018 East Lindsey Local Plan (Core strategy & Site Allocations DPD).

Update 0.5 inserts amendments following feedback from ELDC officers.

1. Legal requirements

- 1.1. This statement has been prepared by Holton-le-Clay Neighbourhood Development Plan Steering Group on the behalf of Holton-le-Clay Parish council to accompany its submission to East Lindsey District Council of the Holton-le-Clay Neighbourhood Development Plan under section 15 of the Neighbourhood Planning Regulations 2012.
- 1.2. The Neighbourhood Plan has been prepared by Holton-le-Clay Parish Council, a qualifying body, for the area covering Holton-le-Clay, designated by East Lindsey District Council on 8th January 2013.
- 1.3. The plan proposal relates to planning matters (the use and development of land) in the designated neighbourhood area and covers the period from 2017 to 2031. It does not contain policies relating to excluded development as laid out in the Regulations.
- 1.4. The following statement will address each of the four 'basic conditions' required of the Regulations and explains how the Neighbourhood Plan meets the requirement of paragraph 8 of schedule 4B to the 1990 Town and Country Planning Act.
- 1.5. The Regulations state that the neighbourhood plan will have met the basic conditions if it:
 - Has regard to national policies and advice contained in guidance issued by the Secretary of State;
 - Contributes to the achievement of sustainable development;
 - Is in general conformity with the strategic policies of the development plan for the area;
 - Is compatible with European Union & European Convention on Human Right (ECHR) obligations.

Fig 1: Holton-le-Clay Designated Neighbourhood Plan Area (Parish Area)



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2. Introduction and Background

- 2.1 The Holton-le-Clay Neighbourhood Plan has been written by the Holton-le-Clay Neighbourhood Development Plan Steering Group, a team of village residents after first investigating the opinions of people representing all parts of the community.
- 2.2 Holton-Le-Clay is a large semi-rural village located at the northern boundary of Lincolnshire; the administrative area for which is East Lindsey District Council. The village is situated 4.5 miles (7.3 km) south of the town of Grimsby and primarily to the east of the A16. Residents of Holton-le-Clay value the community atmosphere of living in a village surrounded by green fields which is a peaceful and pleasant place to live. The geographical location of Holton-le-Clay makes it convenient for travelling to larger centres for employment, commerce and services; however, limited public transport provision means that most residents are dependent upon private vehicles, particularly for commuting to work.
- 2.3 East Lindsey District Council has identified Holton-le-Clay as well positioned for sustainable housing development that would contribute towards meeting their house building targets.
- 2.4 The Steering Group believes that the Holton-le-Clay Neighbourhood Development Plan is an accurate representation of the views of the Holton-le-Clay Community concerning the growth and development of the village. Feedback from the Public Consultation held in Feb. 2016 supports this. The Plan also conforms with guidelines provided by East Lindsey District Council and the NPPF.

3. Development of the Holton-le-Clay Neighbourhood Development Plan.

- 3.1 The Holton-le-Clay Neighbourhood Development Plan was initially a joint venture with the neighbouring village of Tetney, established in September 2011, as part of the "Vanguard Project". This was a pilot scheme intended to test the practical application of the Neighbourhood Planning Reforms. Representatives from the two villages were supported by members of the East Lindsey Planning Policy Team who guided them through the initial steps. At this stage all the Holton-le-Clay representatives were Parish Councillors. A dedicated Neighbourhood Development Plan Officer was employed to support development in East Lindsey in August 2012.
- 3.2 In 2012 the residents of the villages were invited to a public engagement open day and a questionnaire was distributed to each house in the village. The data gathered informed the initial steps of the Neighbourhood Development Plan. A web site was constructed as a focal point for document storage and information sharing but this did not function well and some of the original documentation was lost. Little progress was made between March and November 2014.
- 3.3 In Autumn 2014 a new member of the joint team from Holton-le-Clay took on the role of leading developments in Holton-le-Clay and it was amicably agreed that the joint team should be dissolved and the two villages would work towards individual Neighbourhood Development Plans.
- 3.4 Between December 2014 and February 2015 volunteers from the village were recruited to the Holton-le-Clay Neighbourhood Development Plan Steering Group. The remaining original Holton-le-Clay members of the joint team left the group following the May Parish Council elections and the Coordinator took over the position of Chair / Co-ordinator.
- 3.5 The new Neighbourhood Development Plan Steering Group reviewed the original draft plans and supporting evidence and identified that further evidence would be required to update and complete the plan. From the outset the group agreed that gathering the opinions from diverse groups of village residents was of paramount importance. A fresh Village Survey was prepared and public engagement sessions were organised. A range of village groups, representing different age groups and interests were approached. The Steering Group worked hard to present the

Neighbourhood Development Plan as the method by which Holton-le-Clay residents could positively influence sustainable development of the village.

- 3.6 The Steering Group thought that the existing village plan, *A Village Ringing in the Changes for the Future (2009)*, needed updating. An in depth study resulted in the 'Village Character Assessment'.
- 3.7 In September 2015 the services of the Neighbourhood Development Planning Officer were lost but the East Lindsey Planning Policy team continued to support the Steering Group with the expert and specialist knowledge required.
- 3.8 The draft plan was presented at public meetings and published on the Parish Council website in February and March 2016. It was amended in response to feedback from the community.

4.Challenges faced in preparing the Holton-le-Clay Neighbourhood Development Plan (2015/6):

- 4.1 In the early stages the Holton-le-Clay Development Plan was a joint venture with the neighbouring village of Tetney and a Government grant was allocated to support the joint bid. The Tetney group pulled out of the partnership and the Holton-le-Clay group decided to continue. The Holton-le-Clay Neighbourhood Development Plan Steering Group did not believe they qualified for additional funding support from the County, District or Parish Council to employ specialist writers. The Development Plan which was submitted to the Examiner was therefore written by members of the group with support from East Lindsey Policy Planning Officers. The Plan was submitted to the Examiner who required that some revisions be made. At this point Clive Keble, a specialist Consultant was employed to make the necessary amendments and this was funded by remnants of the grant made to the joint bid.
- 4.2 The East Lindsey Local Plan was then in a process of revision. There has been an element of confusion about which elements of the existing plan are currently applicable and which have been superseded.
- 4.3 ELDC has allocated Holton-le-Clay with a target of 314 houses in the revised Local Plan a larger allocation than neighbouring villages. Residents feel that this is unfair, particularly because Holton-le-Clay has no identified housing shortage and they fear that the Neighbourhood Development Plan cannot address this concern.
- 4.4 During the preparation period of the Neighbourhood Development Plan there have been two applications for large housing developments in Holton-le-Clay, which have the potential to increase the village size by 25% and residents fear will have an overbearing impact on the main route into the village. There is a great deal of opposition within the community to these proposals and this has given some residents the opinion that the Neighbourhood Development Plan is ineffective unless it can influence decisions related to these issues.
- 4.5 Holton-le-Clay has a problem with surface water flooding. A number of agencies have responsibility for addressing aspects of this problem. It has therefore been difficult to source advice concerning the problem and map showing surface water drainage channels.

5. Conformity with National Planning Policy

- 5.1 The Neighbourhood Plan has been prepared in conformity with the policies set out in the National Planning Policy Framework (NPPF) of April 2012. It also gives regard to the 12 core planning principles contained in paragraph 17 of the National Planning Policy Framework, alongside the National Planning Practice Guidance (NPPG) published by the Government in April 2014 in relation to the formation of Neighbourhood Plans.

5.2 The table below sets out a summary of how each policy conforms to the NPPF. The paragraphs referred to are considered to be the most relevant to the policy and are not intended to be a comprehensive list of every possible relevant paragraph.

Table 1: How the NP policies conform to the NPPF

NP Policy Number and Title	NPPF 2019 Paras.	NPPF 2012 Paras.	Comment on conformity
1.Development Design	7,8,9,10, 11,13, 20 21, 29, 30 & 37.	6,7,11,17	Defines the overall approach to development where growth must balance the need for development to meet housing need with the requirement to protect local characteristics of a semi-rural village and enhancing the quality of life for local residents
	105 & 106	4/39	Parking standards.
	124 to 131	6/59	Guidance on scale, density, layout and landscape.
	124 to 131	7/56	Importance of design to build environment.
	124 to 131	7/58	Policy for the quality of developments with respect to stated objectives
	130	7/60	Reinforcing local character.
	124 to 131	7/61	Addressing the connections between people and places and integration into environment.
	129	7/66	Designs that take into account the views of the community.
	128 & 129	8/69	Creating a shared vision with the community – promotion of safety and accessibility.
	170 & 174	111/109	Contributing to the enhancement of the natural and local environment
	96 & 97	162	infrastructure
	170 & 174	165, 166,	environment
		173	Ensuring viability and deliverability.
2.Building Style & House Design	91, 92	6,7,17	Addresses the need for a mix of dwelling sizes in order to provide for local needs. Encourages a housing mix to reflect the positive aspects of the character and appearance of the surrounding area.
	61 & 62	6/50	Wide choice of high quality homes. Mix based on needs of community and local demand.
	91, 92	7/61	Addressing the connections between people and places and integration into environment.
	91, 92	7/61	Addressing the connections between people and places and integration into environment.
3.Affordable Housing	61 & 62	50	Ensures that new development meets the needs of different group within the community and sets out a local connection criteria that prioritises people who have a connection to Holton le Clay
	61 & 62	6/50	Need for affordable housing.
	61 & 62	158/159	A clear understanding of housing needs in the area.
4.Holton-le-Clay Green Plan	96, 97 and 98. 104	17,30,35, 75	Embraces the core principle of planning being a creative exercise in finding ways to enhance the places people live. Seeks to ensure that pedestrians and cyclists have access to an extensive and safe network of paths that will encourage easier access to the countryside. Prioritises pedestrian and cycle movements. Seeks to improve the network of green inter connecting infrastructure across the parish.
	96, 97 and 98	8/73	Access to high quality open space, sports opportunities & facilities.
	96,97 and	8/74 & 75	Protecting open space, sports facilities, public rights of way &

	98		access.
	170 & 174	11/109	Contributing to the enhancement of the natural and local environment
	170 & 174	11/114	Planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure.
	170 & 174	165, 166,	environment
	124 to 131	171	Health and Well-being.
5. Sustainable Urban Drainage	155 to 165	75,99,100,109,114,117	Seeks to minimise incidents of surface-water flooding and to create a network of green infrastructure as part of development schemes and by enhancing the existing provision.
	155 to 165	10/94	Adopting proactive strategies taking full account of flood risk, water supply & demand.
	155 to 165	10/99 & 100	Taking account of flood risk & inappropriate development in areas at risk of flooding.
	155 to 165	10/101, 102 & 103	Assessment of potential flooding in an area – on & off a proposed development site.
6. Employment and Business	80 to 84	20,21,28	Seeks to protect the existing employment site and to encourage new small business premises to strengthen the economic base of the village.
	80 to 84	8/70	Delivering social, recreational & cultural needs, & providing services.
	80 to 84	160	Understanding of business needs and economic markets in the area

6. Contribution to the achievement of sustainable development

6.1 The NPPF has a presumption in favour of sustainable development. The NPPF defines sustainable development as having three dimensions: economic, social and environmental. The Holton-le-Clay NDP recognises that this is a balancing act and the strategic objectives of the Plan comprise a balance of social, economic and environmental goals.

6.2 The social goals are to maintain a thriving community, recognising that the community and its needs change over time. This Plan seeks to achieve this by providing an appropriate mix of new homes to meet the demands and needs of the local community whilst requiring investment in the necessary infrastructure to ensure Holton-le-Clay remains a thriving village with local shops, adequate medical facilities, schools etc. The Green Plan proposals whilst primarily and environmental goal are designed to encourage healthier lifestyles by improving access to the countryside for walking etc.

6.3 The Holton-le-Clay Neighbourhood Development Plan seeks to protect the existing employment area with the village, encouraging local business development and private sector investment in the village. The Plan seeks to encourage local business growth which will increase the sustainability of Holton-le-Clay as a local retail and service hub for surrounding villages, at the same time as maintaining the village ideals of a semi-rural community.

6.4 The environmental goals are to protect the rural environment and ensure that development recognises this in its design, landscaping and access to the surrounding rural areas. The promotion and enhancement of the Green Plan, to extend existing non-vehicular routes and to create new links to both new and existing open space and the designation of local green space, are policies intended to increase access to the countryside around the village.

Table 2 below sets out an assessment of each policy of the plan and how it impacts on each of the three East Lindsey District Council strands of sustainability; economic, social and environmental criteria.

Policies and Criterion	Section 6. Development Design	Section 7. Building Style and Design of Properties	Section 8. Affordable Housing	Section 9. Implementation of H-L-C Green Plan	Section 10. Sustainable Urban Drainage	Section 11. Employment and Business
Nature Conservation	+	0	0	++	++	0
Landscape and Heritage	++	+	0	++	++	0
Air and Climate	+	0	0	++	++	0
Water	+	+	0	++	++	0
Soil	+	+	0	++	++	0
Population	++	++	++	+	+	++
Health and Well-being	++	++	+	++	++	+
Inclusiveness	++	++	+	++	0	0
Infrastructure	++	+	++	++	++	+
Employment and Skills	0	0	0	0	0	++

Key to table of Criteria			
++	Very positive impact	-	negative impact
+	Positive impact	--	very negative impact
0	Neutral impact	?	Uncertain – may have positive or negative influences.

7. Compatibility with EU obligations and legislation

- 7.1 The Neighbourhood Plan has regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights and complies with the Human Rights Act. Considerable emphasis has been placed throughout the consultation process to ensure that no sections of the community have been isolated or excluded.
- 7.2 A screening process was carried out by East Lindsey District which determined that the Neighbourhood Development Plan required a Strategic Environmental Assessment. However, at that time, the NDP included site allocations. Subsequently, as the NDP no longer includes allocations, a "light touch" sustainability appraisal was undertaken.
- 7.3 In a subsequent Screening Opinion (see Appendix 1) ELDC reached the conclusion that: "*As a result of the assessment in section 4, it is unlikely there will be any significant environmental effects arising from the Holton le Clay Neighbourhood Development Plan. As such, the Holton le Clay Neighbourhood Development Plan **does not require a full SEA to be undertaken**". In addition, the Screening Opinion states that: "*it **does not require an assessment under the Habitats Directive**" and that it "**does not set the scale and nature of development in Annexes I and II to the EIA Directive**".**

8. Conclusion

- 8.1 Throughout the preparation process the Neighbourhood Development group have worked to deliver a plan which reflects the views of Holton-le-Clay village residents and conforms with the requirements of the emerging East Lindsey Local Plan and NPPF. As the plan has developed it has been reviewed by officers from East Lindsey District Council who also carried out a 'Health Check' of the final draft plan to ensure conformity before completion of the final proposals. The Holton-le-Clay Neighbourhood Plan Steering Group therefore believes that the proposed Neighbourhood Development Plan conforms with both Local and National Guidelines.

9. 2018 Local Plan (Core Strategy and Site Allocation DPD)

- 8.1 The Neighbourhood Plan was amended (pre-submission) to reflect the emerging Local Plan and in particular to remove site allocations. Therefore, it now reflects the Strategic Policies in the adopted 2018 Core Strategy and Settlement Proposals DPD, in terms of:
- Core Strategy (SP1, SP2, SP3, SP4, SP6, SP7, SP10, SP13, SP16, SP23, SP24, SP 25 and SP26)
 - Settlement Proposals Policy SP DPD1 (Housing), Policy SPD DPD2 (Employment) and the site allocations for Holton le Clay - HLC206, HLC 302 and HLC 303.

Appendix 1



**STRATEGIC ENVIRONMENTAL ASSESSMENT SCREENING
OPINION FOR HOLTON LE CLAY NEIGHBOURHOOD
DEVELOPMENT PLAN**

Prepared by East Lindsey District Council

Screening Opinion Holton le Clay Neighbourhood Development Plan

1. Introduction

1.1 East Lindsey District Council (ELDC) is legally required to determine whether or not the content of the Holton le Clay Neighbourhood Development Plan (NDP) 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. An SEA is used to ensure environmental implications of development are taken into account before any decisions are made. This screening opinion sets out the questions to be asked to determine if an SEA is required and the answers in respect of the Holton le Clay Neighbourhood Plan.

1.2 The purpose of the Holton le Clay NDP is to establish planning policies for the development and use of land within Holton le Clay. Some NDPs will allocate land for development, others will be primarily policy based. The Holton le Clay NDP will be policy based and will not allocated sites for development.

1.3 Below is an outline of the legislation behind the need for this scoping opinion. This is then followed the assessment of the likely significant environmental effects of the NDP and the determination of whether there is the need for a full SEA.

2. Legislation

2.1 The legislation pertaining to Strategic Environmental Assessments and Sustainability Appraisal is European Directive 2001/42/EC. This was transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004, commonly referred to as the SEA Regulations. The Government published 'A Practical Guide to the Strategic Environmental Assessment Directive' (ODPM 2005), which provides more detailed guidance on how an SEA should be carried out.

2.2 The Planning and Compulsory Purchase Act 2004 also requires that a Sustainability Appraisals (SA) is prepared for all spatial plans. It is considered best practice to incorporate requirements of the SEA Directive into an SA.

2.3 The Government has stated that Sustainability Appraisal is not needed for NDPs, but has said that it must be demonstrated how the NDP contributes to the achievement of sustainable development in the area.

2.4 Schedule 2 of the Neighbourhood Planning (General) Regulations 2012 refers to the Habitats Directive. The Directive requires that any plan or project likely to have a significant effect on a European site must be subject to an appropriate assessment. Paragraphs 2 - 5 of Schedule 2 amend the Conservation of Habitats and Species Regulations 2010 so that its provisions apply to NDOs and NDPs. The regulations do state that the making of an NDP is not likely to have a significant effect on a site designated at European level for its biodiversity, however, this needs to be ascertained and this can be done at the time the screening opinion is being sought.

2.5 This report focuses on screening for SEA and the criteria for establishing whether a full assessment is needed.

3. Criteria for Assessing the Effects of a Neighbourhood Development Plan (NDP)

3.1 Schedule 1 of The Environmental Assessment of Plans and Programmes Regulations 2004 sets out the criteria to be used for determining the likely significance of effects on the environment. These are:

1. The characteristics of plans and programmes, having regard, in particular, to—

(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;

(b) the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;

(c) the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;

(d) environmental problems relevant to the plan or programme; and

(e) the relevance of the plan or programme for the implementation of Community legislation on the environment (for example, plans and programmes linked to waste management or water protection).

2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to—

(a) the probability, duration, frequency and reversibility of the effects;

(b) the cumulative nature of the effects;

(c) the transboundary nature of the effects;

(d) the risks to human health or the environment (for example, due to accidents);

(e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);

(f) the value and vulnerability of the area likely to be affected due to—

(i) special natural characteristics or cultural heritage;

(ii) exceeded environmental quality standards or limit values; or

(iii) intensive land-use; and

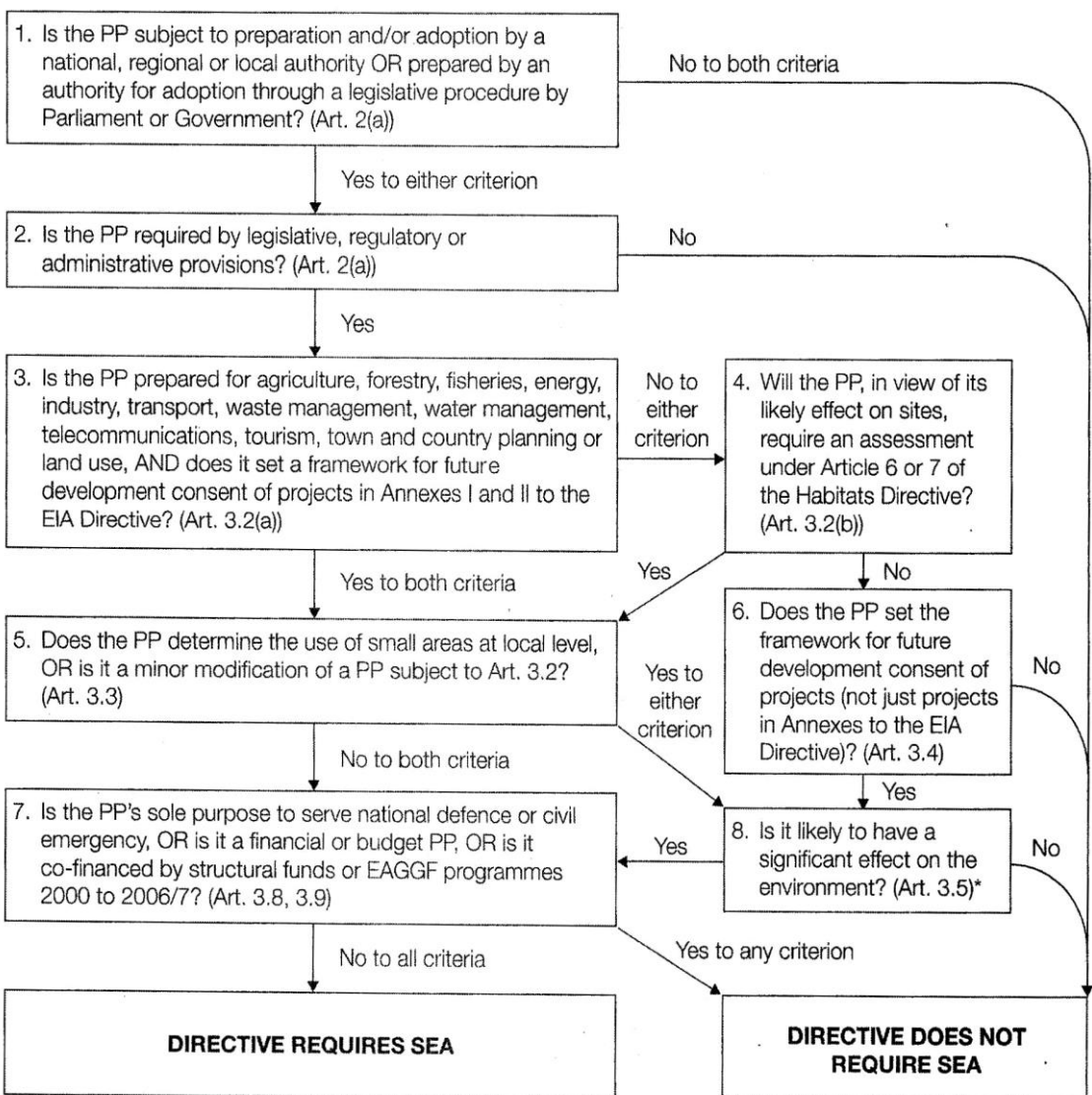
(g) the effects on areas or landscapes which have a recognised national, Community or international protection status.

4. Assessment

4.1 The diagram below illustrates the process for screening a planning document to ascertain whether a full SEA is required.

Figure 2 – Application of the SEA Directive to plans and programmes

This diagram is intended as a guide to the criteria for application of the Directive to plans and programmes (PPs). It has no legal status.



*The Directive requires Member States to determine whether plans or programmes in this category are likely to have significant environmental effects. These determinations may be made on a case by case basis and/or by specifying types of plan or programme.

source: A Practical Guide to the Strategic Environmental Assessment Directive Scottish Executive Welsh Assembly Government and DOE September 2005

4.2 The table below contains the assessment of whether the Holton le Clay NPD will require a full SEA. The questions below are drawn from the diagram above which sets out how the SEA Directive should be applied.

Stage	Y/ N	Reason
<p>1. Is the PP (plan or programme) 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))</p>	Y	<p>The preparation of the Holton le Clay NDP is allowed under the Town and Country Planning Act 1990 as amended by the Localism Act 2011. The Holton le Clay NPD will be "made" (adopted) by East Lindsey District Council once it had passed through the formal stages of its preparation under the Neighbourhood Planning (General) Regulations 2012. Go to Stage 2</p>
<p>2. Is the PP required by legislative, regulatory or administrative provisions? (Art. 2(a))</p>	Y	<p>The preparation of an NDP is not a requirement of legislation, but is an option for communities under the Town and Country Planning Act 1990 as amended by the Localism Act 2011. If the NDP passes all the stages required under the Neighbourhood Planning (General) Regulations 2012, it will be "made" by the District Council and will become part of the development plan for the District. It therefore has to conform to the appropriate legislative, regulatory and administrative procedures. Go to Stage 3</p>
<p>3. Is the PP 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))</p>	N	<p>The NDP is being prepared for town and country planning purposes. However, it does not set a framework for future development consent of projects, does not allocate sites for development or indicate the preferred location for future development, does not set the scale and nature of development in Annexes I and II to the EIA Directive (Art 3.2(a)). Go to 4</p>
<p>4. Will the PP, 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))</p>		<p>Holton le Clay lies 4.6km (2.9 miles) from the North Lincolnshire Coast, which is a Special Protection Area, Special Area of Conservation and a Ramsar site. The Holton le Clay Neighbourhood Plan does not allocate sites for development or indicate the preferred location for</p>

		future development, not does it set the scale and nature of development. The policies focus on design, protection of greenspace, Sustainable Drainage and Employment and Business within the village. As a result, it does not require an assessment under the Habitats Directive. Go to 6
5. Does the PP 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)		N/A
6. Does the PP set the framework for future development consent of projects (not just projects in annexes to the EIA Directive)? (Art 3.4)		Holton le Clay does not set a framework for future development consent of projects, does not allocate sites for development or indicate the preferred location for future development, not does it set the scale and nature of development. Go to 8
7. Is the PP'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/A
8. Is it likely to have a significant effect on the environment? (Art. 3.5)		The Holton le Clay NDP is unlikely to have a significant effect on the environment. The only policies which are likely to directly influence the environment are in relation to SUDs, and the creation and enhancement of greenspace. However, these will have a positive environmental outcome.

5. Screening Outcome

5.1 As a result of the assessment in section 4, it is unlikely there will be any significant environmental effects arising from the Holton le Clay Neighbourhood Development Plan. As such, the Holton le Clay Neighbourhood Development Plan does not require a full SEA to be undertaken.