

Emsworth Neighbourhood Plan Strategic Environmental Assessment (SEA) Screening Report



April 2019

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Introduction

Purpose of this Report

To be 'made', a neighbourhood plan must meet certain Basic Conditions. These include that the making of the plan "does not breach, and is otherwise compatible with, EU obligations."

One of these obligations is Directive 2001/42/EC 'on the assessment of the effects of certain plans and programmes on the environment'. This is often referred to as the strategic environmental assessment (or SEA) Directive. The SEA Directive "seeks to provide a high level of protection of the environment by integrating environmental considerations into the process of preparing plans and programmes." The SEA Directive is transposed into UK law through the Environmental Assessment of Plans and Programmes Regulations (the 'SEA Regulations') and it is these regulations that the plan will need to be compatible with.

Not every neighbourhood plan needs SEA, however, it is compulsory to provide when submitting a plan proposal to the local planning authority, either:

- a statement of reasons as to why SEA was not required, or
- if SEA is required: an environmental report (a key output of the SEA process).

A key stage in the neighbourhood planning process is therefore determining whether or not SEA is required. The process for deciding whether or not an SEA is necessary is referred to as 'screening'. The SEA Regulations require the 'responsible authority' to 'determine' whether or not a plan is likely to have significant effects, and therefore whether SEA is needed. In this case, Havant Borough Council is making the determination.

The Emsworth Neighbourhood Plan

In Emsworth, the preparation of the neighbourhood plan is being led by the Emsworth Neighbourhood Forum, an approved Neighbourhood Forum under the Localism Act 2011, which brings together local residents and organisations to a neighbourhood Plan for the future development of Emsworth.

The forum was established and formally designated by Havant Borough Council in 2014. The Forum aims to promote the social, economic and environmental well-being of the Emsworth Neighbourhood. It has established the following objectives for the Neighbourhood Plan:

1. Maintain and enhance the historic and maritime character of Emsworth, its immediate setting and the wider neighbourhood area.
2. Coordinate all new development so that it contributes to the creation of safe, sustainable, liveable and mixed communities with good access to jobs and essential services for all members of the community.
3. Create a robust yet flexible network of streets and spaces, suitable for all modes of travel and for current and future populations.

4. Use land and resources efficiently so that new developments have a reduced demand for energy and water and move towards carbon neutrality.
5. Protect and enhance the rich natural and historic environment of Emsworth.
6. Ensure the high quality of new development through appropriate use of materials, details and inclusive designs that responds to local context.
7. Ensure that land made available for development will be developed in such a way as to improve people's quality of life, for both new and existing residents.
8. Deliver the social and environmental infrastructure necessary to support a growing community in the 21st Century.
9. Protect and enhance Emsworth's unique linear waterfront experience for use by both current and future generations.
10. Reconnect parts of the community that are currently divided and fragmented through the presence of major road infrastructure.

The Forum consulted on its Pre-submission (Regulation 14) Plan in December 2017, setting out a suite of draft policies to achieve these objectives. The plan makes no site allocations, but sets a framework of criteria based policies to guide development decisions in Emsworth.

The Neighbourhood Forum and the Borough Council have been in constant dialogue during the development of the plan, in order to ensure that the plan avoids significant environmental effects.

Environmental Characteristics of Emsworth

The neighbourhood area corresponds to the established Ward of Emsworth. Emsworth lies at the south-eastern edge of the Borough of Havant. Its eastern boundary is marked by the River Ems, which also marks the boundary with neighbouring West Sussex. Originally a fishing village on the northern shore of Chichester Harbour, it now houses many people who work in Portsmouth, Southampton or Chichester, or further afield. However it is much more than a dormitory settlement since it is an important recreational centre, drawing participants from across the South East of England, some attracted by its sailing activities. It also has a growing employment base in services and small scale manufacturing, some of which is linked to its maritime location.

The southern boundary of the town is the shoreline of Chichester Harbour, which is well protected by its European and national designations, where any development will be very sensitively managed. On the east, the River Ems forms its administrative boundary with West Sussex. Whilst there is considerable social and commercial interaction between Emsworth and these neighbouring areas of Southbourne and to the north, Westbourne, this plan covers only that part of the community within Hampshire. The northern edge of the settlement is marked by woodland known as Hollybank Woods, a part of the ancient Forest of Bere and which creates a natural barrier to significant northward extension and is itself a significant recreational resource.

Emsworth has a number of environmentally sensitive and valuable areas which have various levels of protection. To the south, Chichester Harbour is an Area of Outstanding Natural Beauty (AONB), as

well as important habitat which has national, European and international protection. Chichester Harbour is also a national site of special scientific interest (SSSIs), as well as a Special Protection Areas (SPAs) and a Special Area of Conservation (SAC) and Ramsar site.

The historic woodland of Hollybank Woods (61 hectares), which lies on the northern boundary of Emsworth is important for its flora and fauna, such as bats, orchids and fungi, as well as providing nesting sites for a variety of birds. In addition, several other areas are of particular significance for nature conservation. The woods are designated as a Site of Importance for Nature Conservation (SINC). Brook Meadow is an area of natural unimproved grassland which is also a SINC and has been designated as a Local Nature Reserve. It is important for bird and plant life as well as providing habitat for the water vole along the banks of the River Ems which flows through the reserve. Other small areas are also designated as SINCs, including the Town Mill Pond and the area of the Westbrook north of the railway. To the west of the town, the area known as The Horse Field is part of the AONB, and is also a SINC. Although not designated, the Slipper Mill Pond on the east of the town centre and Peter's Pond which flows into it, are both important habitats for birdlife as well as other flora and fauna. These environmentally valuable areas provide an important framework for the town as well as offering considerable recreational opportunities.

Screening Assessment

Assessment Part 1: Is SEA Required?

The assessment is recorded in tabular form below. Table 1 applies guidance provided in paragraph 2.18 of the government's 'Practical Guide to the Strategic Environmental Assessment Directive'. This suggests a flow chart of questions to determine whether SEA is required.

Assessment Question	HBC Commentary	Conclusion
<p>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))</p>	<p>The preparation of and adoption of the NP is allowed under The Town and Country Planning Act 1990 as amended by the Localism Act 2011. The NP has been prepared by the Emsworth Forum (as the 'relevant body') and will be 'made' by Havant Borough Council (as the local authority), if successful at referendum. The preparation of NPs is subject to the following regulations: The Neighbourhood Planning (General) Regulations 2012 and The Neighbourhood Planning (referendums) Regulations 2012.</p>	<p>Yes. Go to Q2</p>
<p>2 Is the NP required by legislative, regulatory or administrative provisions? (Art. 2(a))</p>	<p>Whilst the Neighbourhood 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 a full SEA is required under the Directive.</p>	<p>Yes. Go to Q3</p>
<p>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 (see Appendix 2) to the EIA Directive? (Art 3.2(a))</p>	<p>Whilst the NP covers a range of land use matters, it does not set the framework for future development consent of projects in Annexes I and II to the EIA Directive</p>	<p>No. Go to Q4</p>
<p>4 Will the NP, 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>A Habitats Regulations Assessment of the Emsworth Neighbourhood Plan is included below.</p>	<p>Yes, see below and go to Q5</p>

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)	Determination of small sites at local level only	Yes. Go to Q8
6	Does the NP set the framework for future development consent of projects (not just projects in annexes to the EIA Directive)? (Art 3.4)	Yes, once made the Neighbourhood Plan will be part of the Development Plan for the area, and will be used to determine planning applications.	Yes. Go to Q8
7	Is the NP'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 EAFF programmes 2000 to 2006/7? (Art 3.8, 3.9)	N/A	N/A
8	Is it likely to have a significant effect on the environment? (Art. 3.5)	See Table 2 below. Overall conclusion: The Neighbourhood Plan does not propose to allocate specific sites for future development, and promotes criteria based policies that seek to shape future development proposals in a way that promotes sustainable development. Specific policies are included that seek to enhance and protect the environment. The content and broad approach of the plan will have to be in general conformity with the Havant Borough Local Plan, which has had regard to European Directives and National Regulations on Environmental Impact. Overall, it is therefore considered to have no significant effect on the environment, or on designated sites. Therefore SEA is not required.	End. SEA not required

SEA Assessment Part 2: Effect on the environment

The following table represents the assessment of whether the Neighbourhood Plan is likely to have a significant effect on the environment, using criteria set out in Annex II of the SEA Directive and Schedule I of the UK Environmental Assessment of Plans and Programmes Regulations 2004.

Criteria (from Annex II of SEA Directive and Schedule I of Regulations)	HBC Assessment	Likely significant environmental effect?
The characteristics of the Emsworth Neighbourhood Plan (ENP)		
The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature,	Once made, the Neighbourhood Plan will form the framework for decision making for development proposals in the area	No

size, and operating conditions or by allocating resources	However, the plan does not make development allocations. It must also be in general conformity with the Adopted Local Plan for Havant Borough. As such the SA/SEA carried out by the Borough Council for the Local Plan is considered sufficient.	
The degree to which the plan or programme influences other plans or programmes including those in a hierarchy	The influence of the ENP on other plans or programmes is limited. While it will be part of the Development Plan once 'made', it sits below the Havant Borough Local Plan in the hierarchy of plans, and must be in general conformity with that plan. It must also confirm to national planning policy.	No
The relevance of the plan or programme for the integration of environmental considerations, in particular with a view to promoting sustainable development	The ENP does not allocate sites for development, and the criteria based policies in the ENP are designed to promote sustainable development, in line with the requirement that all neighbourhood plans must contribute to the achievement of sustainable development.	No
Environmental problems relevant to the plan	Any environmental problems relevant to the plan are local and small scale only (eg noise and air quality at main junction in Emsworth), and as such are not considered significant in the context of SEA.	No
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).	The ENP has to be in general conformity with the Local Plan. The Havant Borough Local Plan has had regard to European Community legislation on the environment.	No
The characteristics of the effects and of the area likely to be affected		
The probability, duration, frequency and reversibility of the effects	An element of environmental change is likely to occur, as the plan does not seek to prevent change. The impact of this change will depend upon the proposals and will be assessed at that stage. The ENP seeks to minimise the effects of development on its immediate surroundings and ensure development is delivered to high levels of sustainability.	No
The cumulative nature of the effects	As above	No
The transboundary nature of the effects	Effects will be local with limited effects on neighbouring areas. No transboundary	No

	effects (=effects on other Member States) are expected.	
The risks to human health or the environment (e.g. due to accidents)	There is limited risk to human health or the environment as a result of the ENP. In fact, the ENP contains proposals to improve the pedestrian environment to make it safer.	No
The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)	The ENP covers the Emsworth Ward only, and any effects are likely to be limited to that area only.	No
The value and vulnerability of the area likely to be affected due to: <ul style="list-style-type: none"> ○ Special natural characteristics or cultural heritage ○ Exceeded environmental quality standards or limit values ○ Intensive Land-use ○ The effects on areas or landscapes which have a recognised National, Community or International protection status. 	The ENP area, has a number of environmentally sensitive and valuable areas which have various levels of protection (AONB, SSSI, SAC, SPA, Ramsar site of Chichester Harbour, as well as Local SINCs). The ENP recognises these designations. They are also carefully taken into account and protected through policies in the Havant Borough Local Plan, with which the ENP must demonstrate conformity. The SNP is unlikely to adversely affect the value and vulnerability of the area in relation to the special natural characteristics or cultural heritage. The policies within the ENP seek to provide greater protection to the character of the area.	No

Conclusion of SEA Screening

SEA would be required if the Emsworth Neighbourhood Plan were likely to have a significant effect on the environment. The results of the above assessment by Havant Borough Council suggests that this will not be the case. As a result, it is suggested that SEA is not required.

Habitats Regulations Assessment

Background

The application of HRA to land use plans is a requirement of Regulation 61 of the Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations), the UK's transposition of European Union Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the Habitats Directive). HRA must be applied to all local planning policy documents in England and Wales and aims to assess the potential effects of a land use plan or policy against the conservation objectives of any sites designated for their nature conservation importance as part of a system known collectively as the Natura 2000 network of European sites.

European sites provide ecological infrastructure for the protection of rare, endangered or vulnerable natural habitats and species of exceptional importance within the European Union. These sites consist of Special Areas of Conservation (SACs, designated under European Union Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the Habitats Directive)) and Special Protection Areas (SPAs, designated under European Union Directive 2009/147/EC on the conservation of wild birds (the Birds Directive)). Additionally, Government policy (The National Planning Policy Framework (CLG, 2012), section 118 and Circular 06/05 (ODPM, 2005) recommends that Ramsar sites designated under the Convention on Wetlands of International Importance (UNESCO, 1971), are treated as if they are fully-designated European sites for the purposes of considering development proposals which may affect them.

Under Regulation 63 of the Habitats Regulations, the assessment must determine whether or not a plan will adversely affect the ecological integrity of the European site(s) concerned. Where negative effects are identified, the process should consider alternatives to the proposed actions and explore mitigation opportunities, whilst adhering to the precautionary principle.

The Emsworth Neighbourhood Plan provides details on how development in Emsworth should take place in order to raise the quality of development and make sure that the development is appropriate in design terms for Emsworth. It does not allocate any development sites. There are existing allocations in the Emsworth area through the Havant Borough Local Plan (Allocations), which itself was subject to a Habitats Regulations Assessment (HRA). Further allocations are currently proposed through the Havant Borough Local Plan 2036 (HBLP 2036). An HRA was undertaken on the Draft HBLP 2036 prior to its publication, and the plan will continue to be subject to HRA as it moves through the statutory drafts and examination.

European sites and methodology

Given that the Emsworth Neighbourhood Plan will sit alongside the HBLP 2036 in the future, it is logical to use the same methodology as the HBLP 2036 for the HRA. Similarly, the same European sites are considered for the Emsworth Neighbourhood Plan as were considered in the screening statement for the Draft HBLP 2036. These are set out in sections 2 and 3 of the HRA of the Draft HBLP 2036, available at www.havant.gov.uk/localplan/regulatory-requirements.

In terms of the need to consider the Emsworth Neighbourhood Plan in combination with other plans and project, the following are identified as needing to be considered as part of this assessment:

- Havant Borough Local Plan (Core Strategy) (2010)
- Havant Borough Local Plan (Allocations) (2014)
- Havant Borough Local Plan 2036 (emerging)
- Chichester Local Plan (2015)

Effects of the Emsworth Neighbourhood Plan

This section considers the Emsworth Neighbourhood Plan policies, acknowledging that the plan is not necessary to European site management. It states whether or not the policy is likely to have an adverse effect on European site integrity, either alone or in combination with other plans and projects. This fulfils Regulation 63(1)(a) of the Habitats Regulations.

The policies can be sorted into one of twelve screening categories, set out below. These categories help to screen which, if any, elements of the plan are likely to have a significant effect and so need appropriate assessment under Regulation 63(1).

Table 7: HRA Screening categories (from The HRA Handbook, DTA Publications, 2015)

- A. General statements of policy/general aspirations
- B. Policies listing general criteria for testing the acceptability/sustainability of proposals
- C. Proposal referred to but not proposed by the plan
- D. Environmental protection/site safeguarding policies
- E. Policies or proposals that steer change in such a way as to protect European sites from adverse effects
- F. Policies or proposals that cannot lead to development or other change
- G. Policies or proposals that could not have any conceivable adverse effect on a site
- H. Policies or proposals the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects)
- I. Policies or proposals with a likely significant effect on a site alone
- J. Policies or proposals not likely to have a significant effect alone
- K. Policies or proposals not likely to have a significant effect either alone or in combination
- L. Policies or proposals likely to have a significant effect in combination

	Proposal will have no adverse effect on a European site.
	Proposal could have a potential effect on a European site, either alone or in combination with other plans or projects.

HRA Screening Matrix - Draft Submission Emsworth Neighbourhood Plan (2018)

Policy or Proposal	Designated Site														
	SM	NF	BH	KV	CLH	Port H	SSW	NF	SDC	Pag H	CLH	Port H	SSW	NF	Pag H
	SAC	SAC	SAC	SAC	SPA	SPA	SPA	SPA	SPA	SPA	Ramsar	Ramsar	Ramsar	Ramsar	Ramsar
C1 – Community & Public Service Hub	K	K	K	K	K	K	K	K	K	K	K	K	K	K	K
C2 – Retail, High Street & Food / Drink Uses	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B
C3 – Public Realm Design	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B
C4 – Leisure & Recreational Facilities	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B
C5 – Designated Local Green Spaces	D	D	D	D	D	D	D	D	D	D	D	D	D	D	D

HRA Screening Matrix - Draft Submission Emsworth Neighbourhood Plan (2018)

Policy or Proposal	Designated Site														
	SM	NF	BH	KV	CLH	Port H	SSW	NF	SDC	Pag H	CLH	Port H	SSW	NF	Pag H
	SAC	SAC	SAC	SAC	SPA	SPA	SPA	SPA	SPA	SPA	Ramsar	Ramsar	Ramsar	Ramsar	Ramsar
L1 – General Housing Policy	K	K	K	K	K	K	K	K	K	K	K	K	K	K	K
L2 – Housing Mix	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B
L3 – Walking distances	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B
Policy L4 – Independent living	K	K	K	K	K	K	K	K	K	K	K	K	K	K	K
L5 – Avoiding settlement coalescence	D	D	D	D	D	D	D	D	D	D	D	D	D	D	D
W1 – Employment Premises and Design Quality	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B

HRA Screening Matrix - Draft Submission Emsworth Neighbourhood Plan (2018)

Policy or Proposal	Designated Site														
	SM	NF	BH	KV	CLH	Port H	SSW	NF	SDC	Pag H	CLH	Port H	SSW	NF	Pag H
	SAC	SAC	SAC	SAC	SPA	SPA	SPA	SPA	SPA	SPA	Ramsar	Ramsar	Ramsar	Ramsar	Ramsar
W2 – Strong Economy & Youth Training	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A
W3 – Change of Use Applications	K	K	K	K	K	K	K	K	K	K	K	K	K	K	K
W4 – Technology & Tourism	K	G	K	K	K	K	G	G	K	G	K	K	G	G	G
W5 – Home Working	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A
W6 – Creative & Digital Infrastructure	K	K	K	K	K	K	K	K	K	K	K	K	K	K	K

HRA Screening Matrix - Draft Submission Emsworth Neighbourhood Plan (2018)

Policy or Proposal	Designated Site														
	SM	NF	BH	KV	CLH	Port H	SSW	NF	SDC	Pag H	CLH	Port H	SSW	NF	Pag H
	SAC	SAC	SAC	SAC	SPA	SPA	SPA	SPA	SPA	SPA	Ramsar	Ramsar	Ramsar	Ramsar	Ramsar
M1 – Havant Road Civic Square	K	K	K	K	K	K	K	K	K	K	K	K	K	K	K
M2 – Improve the pedestrian environment	K	G	K	K	K	G	G	G	G	G	K	G	G	G	G
M3 – Cycling Strategies	K	G	K	K	K	G	G	G	G	G	K	G	G	G	G
M4 – Cycle Storage Provision	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B
WF1 – Public Enjoyment of the Waterfront	G	G	K	K	K	G	G	G	G	G	K	G	G	G	G

HRA Screening Matrix - Draft Submission Emsworth Neighbourhood Plan (2018)

Policy or Proposal	Designated Site														
	SM	NF	BH	KV	CLH	Port H	SSW	NF	SDC	Pag H	CLH	Port H	SSW	NF	Pag H
	SAC	SAC	SAC	SAC	SPA	SPA	SPA	SPA	SPA	SPA	Ramsar	Ramsar	Ramsar	Ramsar	Ramsar
H1 – Design & Heritage	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B
H2 – Heritage Appraisals	F	F	F	F	F	F	F	F	F	F	F	F	F	F	F
H3 – Buildings of Local Historic Interest	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B
D1 – General Design Policy	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B
D2 – Height, Mass & Materials	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B
D3 – Layout, Form & Density	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B

HRA Screening Matrix - Draft Submission Emsworth Neighbourhood Plan (2018)

Policy or Proposal	Designated Site														
	SM	NF	BH	KV	CLH	Port H	SSW	NF	SDC	Pag H	CLH	Port H	SSW	NF	Pag H
	SAC	SAC	SAC	SAC	SPA	SPA	SPA	SPA	SPA	SPA	Ramsar	Ramsar	Ramsar	Ramsar	Ramsar
D4 – Design of Public Spaces & external areas	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B
D5 – Integration & Strong Connections	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B
D6 – Resource Efficiency	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B
D7 – Mitigate Light Pollution	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B

Conclusion

Need for Appropriate Assessment

Under Regulation 63(1), an appropriate assessment is required of any policy which would be likely to lead to a significant effect, either alone or in combination with other plans and projects, on a European site. None of the policies in the Emsworth Neighbourhood Plan are considered likely to lead to a significant effect. They have thus been screened out and do not require appropriate assessment.

Conclusion of HRA

The Council has carried out a screening assessment and appropriate assessment of the Emsworth Neighbourhood Plan submission draft. It is the Council's view, as the competent authority under the Habitats Regulations, that the proposals in the Emsworth Neighbourhood Plan will not adversely affect the integrity of a European site.

Consultation Bodies Screening Opinion

The regulations require the consultation bodies (Natural England, Historic England, the Environment Agency) to be consulted on this screening report.

These bodies have been consulted and all three have confirmed that they agree with the Council's assessment that SEA is not required, and that the proposals in the Emsworth Neighbourhood Plan will not adversely affect the integrity of a European site.

Key resources used in this report

Environmental Assessment of Plans and Programmes Regulations 2004 (S.I. 2004/1633)

http://www.legislation.gov.uk/uksi/2004/1633/pdfs/uksi_20041633_en.pdf

The UK Government's Planning Practice Guidance (PPG) advice on SEA

<http://planningguidance.communities.gov.uk/blog/guidance/strategic-environmental-assessmentand-sustainability-appraisal/>

ODPM: A practical guide to the Strategic Environmental Assessment Directive

<https://www.gov.uk/government/publications/strategic-environmental-assessment-directive-guidance>

Locality: Screening neighbourhood plans for strategic environmental assessment: A toolkit for neighbourhood planners

https://mycommunity.org.uk/wp-content/uploads/2016/09/160602-TOOLKIT_SEA_FINAL_Oct-2016.pdf