

Review of the Strategic Environmental Assessment (SEA) process for the Cranleigh Neighbourhood Plan

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Quality information

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Revision History

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1. Introduction

- 1.1 AECOM is commissioned to conduct a review of the Strategic Environmental Assessment (SEA) work completed to date in support of the emerging Cranleigh Neighbourhood Plan (CNP). In particular, the aim is to review the 'Sustainability Report: Updated to inform the Examination of the Cranleigh Neighbourhood Plan (May 2020)', which is the primary output of the SEA process, and hence must present certain specified information, as set out in the Environmental Assessment of Plans and Programmes 2004 ('the SEA Regulations').

Background

- 1.2 The CNP has been in development since 2013 with the Plan area being formally designated in July 2013. The CNP has been prepared by volunteers, residents and Cranleigh Parish Council and has sought to engage the local community and stakeholders throughout the process.
- 1.3 Under Regulation 14 of the Neighbourhood Planning Regulations (2012, as amended), consultation on a draft version of the CNP was conducted during the period 12th February to 26th March 2019. Following consultation, the CNP was updated in light of responses received.
- 1.4 Following the Parish Council's approval of the Draft Regulation 15¹ Neighbourhood Plan and supporting documents in September 2019, the CNP was submitted to Waverley Borough Council (WBC). Regulation 16² consultation was then undertaken over the period 18th October to 29th November 2019.
- 1.5 The CNP was subsequently submitted for independent examination. As part of the examination, the examiner issued a 'note on interim findings on the Cranleigh Neighbourhood Plan' on 16th April 2020, which highlighted several concerns warranting review by the Parish Council and WBC before examination could proceed. As a result of this note, and following formal responses made by the Parish Council and WBC, the Examiner confirmed that the examination of the Cranleigh Neighbourhood Plan should be formally suspended whilst further SEA and HRA work is undertaken.
- 1.6 The 'Sustainability Report: Updated to inform the Examination of the Cranleigh Neighbourhood Plan (May 2020)' (also an accompanying 'Non-Technical Summary') was then published on the Neighbourhood Plan webpage in May 2020, with a view to addressing the Examiner's concerns in respect of SEA.

Interim findings at Examination

- 1.7 The Examiner's interim findings highlighted the following concerns in relation to submitted version of the Sustainability Report, which was the report submitted with a view to providing the information required of the 'Environmental Report' by the SEA Regulations:
- Lack of clarity about the environmental designations of relevance to the Plan area
 - No clear assessment of the Plan against the key environmental designations such as the Area of Outstanding Natural Beauty (AONB) or why such designations are not relevance
 - The report does not identify, describe and evaluate the likely significant effects on the environment of implementing the Plan in a satisfactory manner
 - No consideration of 'reasonable alternatives' apart from a 'do nothing' scenario
 - No reference to monitoring measures
 - No non-technical summary is provided
- 1.8 These concerns led the Examiner to conclude that SEA requirements had not been met.

¹ Of the Neighbourhood Planning Regulations 2012 (as amended)

² Ibid.

Structure of this review

- 1.9 The fundamental requirement of the Environmental Report, or Sustainability Report in this case, is to present an assessment of “the plan and reasonable alternatives”. Additionally, there is a requirement to present certain other specified information, as set out in Schedule 2 of the SEA Regulations. This review considers each of these matters in turn, before returning to the specific concerns raised by the Examiner, and then finally discussing next steps.

2. An assessment of the plan and reasonable alternatives

Assessment of the plan

- 2.1 Paragraphs 5.12 - 5.15 of the Sustainability Report present an appraisal of the plan, drawing upon the analysis presented in preceding Table 5.2. Whilst there is the potential to go into additional detail, the information presented within the current version of the Sustainability Report is considered to be adequate.
- 2.2 Were the decision taken to further update the report, we would recommend presenting a discussion of how the plan performs, as a whole, under each of the sustainability objectives in turn. Also, some of the appraisal findings could be explained more clearly, for example:
- Policy CRAN4 (which allocates the ‘St Nicholas Junior School Site’) – tensions with sustainability objectives (including biodiversity-related) could be explained more clearly.
 - Flood risk – the appraisal serves to suggest that there are no tensions between allocations and flood risk objectives, but a clear statement to confirm that none of the allocations intersect a flood zone would be helpful to the reader;
 - Overall conclusion – Section 7 concludes by stating that “*there are a small number of potential negative effects in individual criterion in a limited number of policies. However, none of these negative effects are significant and all are considered capable of being mitigated in full.*” A clearer statement would be: “*Certain proposed allocations result in a tension with certain sustainability objectives; however, these tensions are of limited significance, and, furthermore, policies are in place to ensure sufficient mitigation.*”

Assessment of reasonable alternatives

- 2.3 The section on reasonable alternatives, within the Sustainability Report, deals with two matters:
- Scale of growth
 - Locations for development

Scale of growth

- 2.4 Three alternative scales of growth are appraised, which is helpful, albeit the alternatives are not spatially defined, which limits the ability to draw detailed conclusions.
- 2.5 As for the appraisal itself, whilst there is the potential to go into additional detail, for example by presenting a discussion under each of the sustainability objectives in turn, the information presented is considered to be adequate.

Locations for development

- 2.6 The approach taken has involved appraising 41 site options in isolation against a set of criteria, with the criteria having been defined in order to reflect the established sustainability objectives as far as possible. Work of this nature is standard practice for Neighbourhood Plans seeking to allocate one or more sites.

- 2.7 The analysis is helpful to the reader / interested parties, as it helps to explain the reasons for narrowing the list of sites in contention for allocation from 41 to seven. Paragraphs 5.28 and 5.29 of the report then explain the reasons for allocating three of the shortlisted seven sites.

A further comment on reasonable alternatives

- 2.8 There is the potential to take the analysis further by defining and appraising alternative packages of sites, for example:
- 1) the proposed allocations
 - 2) one or more alternative packages of sites that would provide for a similar number of homes;
 - 3) one or more alternative packages of sites that provide for additional homes.
- 2.9 However, this is not necessarily a requirement. The information presented currently within the Sustainability Report will prove helpful to interested parties, and is considered to be adequate.
- 2.10 Furthermore, it is recognised that it could be a challenge to identify one or more ‘reasonable’ alternative packages of sites. This is the point being made at paragraph 5.31 of the report (also the final sentence of paragraph 5.29), although the point might be explained more clearly.

3. Certain other specified information

- 3.1 Schedule 2 of the Regulations lists the information to be included within an Environmental Report, of Sustainability Report in this case. The requirements of Schedule 2 are considered in turn below, in **Table 3.1**.
- 3.2 The conclusion from Table 3.1 is that the updated version of the Sustainability Report (May 2020) does present the information required of the Regulations.

Table 3.1: ‘Checklist’ of how (throughout the SEA process) and where (within the Sustainability Report) regulatory requirements have been, are, or will be met.

Reference	Requirement	How this has been met through the SEA process
1	An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.	The Sustainability Report presents an outline of the draft Plan and the main objectives in Section 1 (para’s 1.7 to 1.11). Appendix B also provides a summary of relevant plans and programmes.
2	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	Sections 3 and 4 of the Sustainability Report present a good review of the baseline situation, including its likely evolution without the CNP.
3	The environmental characteristics of areas likely to be significantly affected.	Sections 3 and 4 of the Sustainability Report present a good review of the baseline situation, including spatial variation (via maps) and summary discussion of key spatial issues.
4	Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Council Directive 79/409/EEC on the conservation of wild birds and the Habitats Directive.	Sections 3 and 4 of the Sustainability Report present a good review of the baseline situation and key issues. Table 4.1 notably presents a helpful SWOT analysis, whilst Table 4.2 summarises the challenges facing Cranleigh in the absence of a CNP.
5	The environmental protection objectives, established at International, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental	Throughout the updated Sustainability Report (May 2020) reference is made to the relevant environmental and sustainability objectives at the international, national and local level, including in Section 1, 2 and 3 and Appendix B.

Reference	Requirement	How this has been met through the SEA process
	considerations have been taken into account during its preparation.	
6	The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, on issues such as; biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage, including architectural and archaeological heritage, landscape and the inter-relationship between the issues referred to in sub-paragraphs.	As discussed within Section 2 of this report, Section 5 of the Sustainability Report presents an appraisal of the plan and reasonable alternatives in respect of the established sustainability objectives.
7	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	The report does not propose any mitigation measures, or make any recommendations of any form, on the basis that the plan is not predicted to result in any significant adverse effects.
8	An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies of lack of know-how) encountered in compiling the required information.	As discussed within Section 2 of this report, the decision was taken to focus work in respect of reasonable alternatives on: 1) scale of growth; and 2) locations for development. This approach is judged to be adequate. In respect of reasons for arriving at the three 'scale of growth' alternatives, this information is presented at paragraph 5.17. In respect of reasons for arriving at the 41 potential 'locations for development', this information is presented at paragraph 5.22.
9	A description of the measures envisaged concerning monitoring in accordance with regulation 17.	Monitoring indicators are proposed in Section 6 of the Sustainability Report.
10	A non-technical summary of the information provided under paragraphs 1 to 9.	A non-technical summary is provided alongside the Sustainability Report.

4. Checklist against the Examiner's interim findings

4.1 The examiners concerns have already been summarised above. Taking each in turn:

Key environmental designations

4.2 Sections 3 and 4 present a good review of baseline issues locally, including in respect of environmental designations, and this information does appear to have fed through into the appraisal work presented in Section 5. Paragraph 5.15 notably states:

"In considering the Surrey Hills Area of Outstanding Natural Beauty (AONB), this being the key environmental asset of national importance within the parish, the Plan's policies are not likely to have any significant detrimental impacts on it. Indeed, the site allocation policies (CRAN3-5) and policy CRAN13 addressing the natural landscape and rural character ensure that development will be directed away from the AONB and, any development which could have an impact on it, must adequately mitigate that impact. In this regard, the overall impact of the Plan on the Surrey Hills AONB is considered to be positive".

Appraisal of the plan

- 4.3 As discussed in Section 2 of this report, the draft plan appraisal presented in Section 5 of the updated Sustainability Report is judged to be adequate.

Reasonable alternatives

- 4.4 As discussed in Section 2 of this report, the information presented in respect of reasonable alternatives, within Section 5 of the updated Sustainability Report, is judged to be adequate.

Monitoring

- 4.5 Section 6 of the report proposes monitoring indicators.

Non-technical summary

- 4.6 A non-technical summary is available alongside the main Sustainability Report.

5. Conclusions and next steps

- 5.1 In conclusion, the updated Sustainability Report is judged to present the information required of the Environmental Report by the Environmental Assessment of Plans and Programmes ('SEA') Regulations, and to address the concerns raised by the Examiner's note of April 2020. Whilst this report recommends ways in which the report might be further improved, it is not considered essential that the Sustainability Report is further updated.
- 5.2 The next step will be for the Examiner to determine whether further consultation on the CNP alongside the Sustainability Report is required. Consultation on the draft plan alongside a report that presents "an assessment of the plan and reasonable alternatives" (also certain other specified information) is a central requirement of the SEA process; however, equally, there is a need to take a proportionate approach that recognises the advanced stage of plan preparation. It is not necessarily the case that further formal public consultation is an automatic requirement. For example, it might be judged proportionate to engage directly with specific interested parties.