

Date: 14 June 2018  
Our ref: 246967



Cranleigh Parish Council

**BY EMAIL ONLY**

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Dear Sir or Madam,

### **Planning Consultation: Cranleigh Neighbourhood Plan - SA/SEA Scoping Report**

Thank you for your consultation on the above dated 4 May 2018.

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.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where our interests would be affected by the proposals made.

In our review of the Cranleigh Neighbourhood Plan Strategic Environmental Assessment (SEA) scoping report we are not satisfied with the scope and contents of the proposed SEA.

We have specific comments to make about the assessment criteria used:

- **Sustainability theme 1 & 2/Env** – we advise reconsidering the criteria used here to assess the Plan's policies and development allocations. More specific criteria is needed to fully assess the potential impacts on the natural environment. Criteria could include: *'will the policy/proposal protect and enhance priority habitats and the habitats of protected species(NPPF para. 117); Achieve a net gain in biodiversity (NPPF para.109); support enhancements to multifunctional green infrastructure networks/corridors (NPPF para. 114); support access to green open spaces and nature?*
- **Sustainability theme 3/Env** – We recommend specifically mentioning the Surrey Hills AONB in this objective. Similarly to the above, we advise you add more specific criteria to ensure great weight is given to protecting the Surrey Hills AONB, in line with Paragraph 115 of the NPPF. Criteria could include: *' is the development site within a protected landscape or its setting; is the site sufficiently screened; does the site impact on important views into and out from the AONB or its setting?'*
- **Climate change objective** – we advise you consider the addition of a climate change objective to assess whether the Plan reduces the level of contribution to climate change made by activities within the Neighbourhood Plan Area.

In light of the advice given above, we further recommend you revisit the Site Assessment Proforma Environmental Considerations and scoring methodology so that it takes into account the more detailed criteria. We also advise creating a new set of considerations for Landscape Impacts. This will ensure that all policies and proposals in the Plan are assessed thoroughly.

For further detail on these topics please refer to Annex 1

Yours sincerely

Pierre Fleet  
Adviser  
Sustainable Development  
Thames Team

# Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

## Natural Environment Information Sources

The [Magic](http://magic.defra.gov.uk/)<sup>1</sup> website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available [here](#)<sup>2</sup>.

**Priority habitats** are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)<sup>3</sup>. Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

**National Character Areas** (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)<sup>4</sup>.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](http://magic.defra.gov.uk/)<sup>5</sup> website and also from the [LandIS website](http://www.landis.org.uk/)<sup>6</sup>, which contains more information about obtaining soil data.

## Natural Environment Issues to Consider

The [National Planning Policy Framework](https://www.gov.uk/government/publications/national-planning-policy-framework--2)<sup>7</sup> sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/)<sup>8</sup> sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

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<sup>1</sup> <http://magic.defra.gov.uk/>

<sup>2</sup> <http://www.nbn-nfbr.org.uk/nfbr.php>

<sup>3</sup> <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

<sup>4</sup> <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

<sup>5</sup> <http://magic.defra.gov.uk/>

<sup>6</sup> <http://www.landis.org.uk/index.cfm>

<sup>7</sup> <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

<sup>8</sup> <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

### Internationally and Nationally Designated Sites

If there are designated sites within your parish the SEA should thoroughly assess the potential for the Plan to affect designated sites, including direct and indirect impacts. European sites (eg designated Special Areas of Conservation and Special Protection Areas) fall within the scope of the Conservation of Habitats and Species Regulations 2010. Nationally designated sites (eg SSSI) are protected under the Countryside and Right of Way Act 2000. In addition paragraph 118 of the National Planning Policy Framework requires that potential Special Protection Areas, possible Special Areas of Conservation, listed or proposed Ramsar sites, and any site identified as being necessary to compensate for adverse impacts on classified, potential or possible SPAs, SACs and Ramsar sites be treated in the same way as classified sites.

The SEA should detail how impacts to designated sites will be avoided, mitigated or, as a last resort, compensated for

### Regionally and Locally Important Sites

If there are local wildlife sites within your parish the SEA should thoroughly assess the potential for the Plan to affect these sites, including direct and indirect impacts. If there are likely to be any adverse impacts you'll need to provide information about how such impacts will be avoided, mitigated or, as a last resort, compensated for.

### Wildlife habitats

Some proposals can have adverse impacts on priority habitats (listed [here](#)<sup>9</sup>) or [Ancient woodland](#)<sup>10</sup>. If there are likely to be any adverse impacts you'll need to provide information about how such impacts will be avoided, mitigated or, as a last resort, compensated for.

### Priority and protected species and habitat

You'll also want to consider whether any proposals might affect priority habitats or species (listed [here](#)<sup>11</sup>) or protected species. To help you do this, Natural England has produced advice [here](#)<sup>12</sup> to help understand the impact of particular developments on protected species. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found [here](#).

### Ancient woodland and veteran trees

You should consider whether your Plan impacts on ancient woodland or veteran trees as required by paragraph 118 of the NPPF. Natural England maintains the Ancient Woodland [Inventory](#) which can help identify ancient woodland. Natural England and the Forest Commission have produced [standing advice](#) for planning authorities in relation to ancient woodland and veteran trees. It should be taken into account when determining relevant plan policies.

### Biodiversity net gain

Under section 40 of the Natural Environment and Rural Communities Act 2006 Local Planning Authorities are required to conserve biodiversity. The NPPF section 109 states "*the planning system should contribute to and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity wherever possible*". Suitable methods for calculating biodiversity net gain can include the Defra biodiversity offsetting metric<sup>13</sup> and the

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<sup>9</sup><http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

<sup>10</sup> <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

<sup>11</sup> <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

<sup>12</sup> <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

<sup>13</sup> <https://www.gov.uk/government/collections/biodiversity-offsetting#guidance-for-offset-providers-developers-and-local-authorities-in-the-pilot-areas> Note; the 'Guidance for developers' and 'Guidance for offset providers' documents provide a calculation method.

environment bank biodiversity impact calculator<sup>14</sup>. Natural England would expect a policy within the Neighbourhood Plan to include wording to ensure that net biodiversity gain is achieved.

### Green Infrastructure

Your Plan can offer exciting opportunities to enhance your local environment through inclusion of green infrastructure (GI). Green infrastructure can help you provide the required 'biodiversity net gain' and also comply with the NPPF paragraphs 109 and 118. If you are setting out policies on new development or proposing sites for development, you should identify what environmental features you want to be retained, connected, enhanced or new features you would like to see created as part of any new development. Examples might include:

- Providing greenspace in line with the Accessible Natural Greenspace Standards (ANGSt).
- Providing a local wildlife site.
- Providing landscaped footpaths through the new development to link into existing rights of way or neighbouring greenspace.
- Restoring neglected hedgerows and creating new ones.
- Creating ponds as part of the SUDS and as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Avoid using non-native invasive plants in landscaping and greenspace plantings
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Designing lighting to encourage wildlife.
- Adding a green roof and vertical gardens to new buildings..

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your Plan how you would like to implement elements of a wider Green Infrastructure Strategy in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision.
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance on this](#)<sup>15</sup>).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks, changing hedge cutting timings and frequency).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition or clearing away an eyesore).

### Landscape

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, you will need to carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds,

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<sup>14</sup> <http://www.environmentbank.com/impact-calculator.php> , and [http://www.google.co.uk/url?sa=t&rct=j&q=&esrc=s&source=web&cd=3&ved=0ahUKEwi7vcbl0aDQAhVMDcAKHb8IDEUQFggsMAI&url=http%3A%2F%2Fconsult.welhat.gov.uk%2Ffile%2F4184236&usq=AFQjCNFfkbJIJQ\\_UN0044Qe6milLffxckg](http://www.google.co.uk/url?sa=t&rct=j&q=&esrc=s&source=web&cd=3&ved=0ahUKEwi7vcbl0aDQAhVMDcAKHb8IDEUQFggsMAI&url=http%3A%2F%2Fconsult.welhat.gov.uk%2Ffile%2F4184236&usq=AFQjCNFfkbJIJQ_UN0044Qe6milLffxckg)

<sup>15</sup> <http://planningguidance.planningportal.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space/local-green-space-designation/>

woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

#### Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development allocations, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see our publication [Agricultural Land Classification: protecting the best and most versatile agricultural land](#)<sup>16</sup>.

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<sup>16</sup> <http://publications.naturalengland.org.uk/publication/35012>