# **Cranleigh Neighbourhood Plan**

# Strategic Environmental Assessment Screening opinion

## Introduction

This screening opinion has been prepared by Waverley Borough Council (the Council) to determine whether or not a full Strategic Environmental Assessment (SEA) is required. This is to ensure that the proposed Plan is in accordance with Regulations 5 and 9 of the Environmental Assessment of Plans and Programmes Regulations 2004 (the regulations) and to meet the 'Basic Conditions' for Neighbourhood Development Plans set out in the Town and Country Planning Act 1990 (amended).

### Background

A screening report has been produced by consultants AECOM, attached at Appendix 1. The report concluded that there is evidence to suggest the potential for significant effects to arise as a result of the plan and that SEA should be applied as a tool to ensure that this is the case. In accordance with the regulations, Natural England, Historic England and the Environment Agency were consulted on the findings of the screening report on 25 January 2016. The following responses were received (reproduced in full at Appendix 2).

Consultation body	Summary of response	Waverley Borough Council response
Natural England	It is our advice, on the basis of the material supplied with the consultation, that, in so far as our strategic environmental interests are concerned (including but not limited to statutory designated sites, landscapes and protected species, geology and soils), that there is potential to be significant environmental effects from the proposed plans on sensitive sites.	Noted
	We have checked our records and based on the information provided, we can confirm that in our view that both Cranleigh and Farnham's Neighbourhood Plans have the potential to cause significant effects on sensitive sites that Natural England has a statutory duty to protect. We note that there is potential for both Plans to allocate sites for development, but these are not specifically stipulated currently. Natural England advise that we concur with the conclusion reached by Aecom in their SEA screening assessment for both the Cranleigh and Farnham Local Plans, which concluded that both should undertake a SEA.	
Historic England	<ul> <li>Thank you for consulting Historic England on the Screening Opinions prepared with regard to the need for Strategic Environmental Assessment of the Cranleigh and Farnham Neighbourhood Plans. I am pleased to confirm that we agree with both screening opinions that SEA should be required, in coming to this opinion we have taken the following factors into account:</li> <li>Cranleigh Neighbourhood Plan</li> <li>The Cranleigh Neighbourhood Plan is at an early stage of preparation and, at present it isn't clear whether it will allocate sites for particular land uses;</li> <li>The screening opinion suggests that it may, however, allocate sites for a large number of</li> </ul>	Noted

<b></b>		1
	residential uses to determine the outcome of an	
	expected allotment within the District Local Plan;	
	However, the draft neighbourhood plan	
	referred to in the opinion did not include housing	
	allocations and it is a matter for the community to	
	determine whether the plan will do this rather than a	
	requirement that can be imposed by the local planning	
	authority;	
	The area contains a number of heritage assets	
	including a conservation area and numerous listed and	
	locally listed buildings (Buildings of Merit), two	
	scheduled monuments and non-designated sites	
	recorded on the Historic Environment Record, as well	
	as having the potential for previously unidentified	
	heritage assets;	
	<ul> <li>Impacts to heritage assets, where they occur,</li> </ul>	
	are required by National Planning Policy and in some	
	cases by legislation to be considered in terms of their	
	impact on the significance of the heritage assets	
	including impacts to their setting;	
	Heritage assets are a fragile, irreplaceable	
	resource and, as such, impacts to them are likely to be	
	irreversible or long term;	
	0	
	Proposals have not been subject to SEA at a	
	suitable level of detail for a higher-level document or	
	may differ from proposals assessed for higher-level	
	documents.	
	As such we conclude that SEA of the plan should be	
	required as a result of likely significant environmental	
	effects to the historic environment and cultural heritage	
	of the plan area.	
Environment	Thank you for your consultation about the Farnham	Noted
Agency	and Cranleigh neighbourhood development plans,	
	which was forwarded to us by our enquiries unit. We	
	have read the screening opinions prepared by AECOM	
	for both Cranleigh and Farnham. We note that in both	
	cases the quantum of development within the	
	neighbourhood area is to be determined by the	
	Waverley Local Plan, and that neither neighbourhood	
	plan will look to allocate land to deliver a quantum	
	above the Waverley local Plan figure. We note that in	
	both cases, the Waverley local plan will allocate	
	strategic sites, leaving the two neighbourhood plans to	
	allocate non-strategic sites. We note too that both	
	neighbourhood plans may ultimately need to allocate	
	land to deliver a significant number of homes.	
	We have reviewed the environmental constraints for	
	the two neighbourhood plan areas. We concur with	
	AECOM that in both cases, there is evidence to	
	suggest the potential for significant environmental	
	effects to arise as a result of the plan.	
		l

# Conclusion

The screening report concludes that an SEA is required. The consultation bodies have not objected to this conclusion. The Council agrees with the conclusion in the screening report. Therefore, the Council determines that the plan does require an SEA.

# Appendix 1

SEA Screening Report



AECOM 6-8 Greencoat Place, London, SW1P 1PL T F +44 (0)20 7798 5001

22<sup>nd</sup> January 2016

Ian Motuel Principal Planner (Policy) Waverley Borough Council The Burys, Godalming, Surrey

Dear lan,

### Cranleigh Neighbourhood Plan: Strategic Environmental Assessment (SEA) Screening Opinion

Waverley Borough Council has asked that AECOM provide an SEA Screening Opinion in relation to the Cranleigh Neighbourhood Plan (CNP). This letter presents our screening opinion.

#### Background

One of the basic conditions that a Neighbourhood Plan is tested against is whether the making of the NP is compatible with European Union obligations, including obligations under the SEA Directive. The aim of the SEA Directive is

"to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development, by ensuring that an environmental assessment is carried out of certain plans and programmes which are likely to have significant effects on the environment."

To decide whether a proposed Neighbourhood Plan is likely to have significant environmental effects, and hence requires SEA, it should be screened at an early stage, i.e. once the plan remit and objectives have been formulated.

Screening is 'Stage A' in the Government's recommended six stage approach to SEA for Neighbourhood Plans. If it is determined, through screening, that significant environmental effects are unlikely and hence SEA is not required, then plan-makers need not concern themselves with subsequent stages of the SEA process.<sup>1</sup>

#### Who is responsible for screening?

The SEA Regulations state that a screening determination should be reached by 'the responsible authority', which in this case is Waverley Borough Council. The council will reach a determination inlight of this screening opinion, and also potentially in consultation with the statutory consultation bodies (Natural England, the Environment Agency and Historic England). AECOM is well placed to provide a screening opinion, given our extensive experience as SEA practitioners in the context of Local and Neighbourhood Plan-making, including in support of the emerging Waverley Local Plan.

#### Screening methodology

Screening essentially involves giving consideration to the anticipated scope of the plan in question and the scope of environmental issues (to include opportunities) locally, before coming to a conclusion on the potential for a cause-effect relationship, i.e. 'significant effects on the environment'.

<sup>&</sup>lt;sup>1</sup> <u>http://planningguidance.planningportal.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/sustainability-appraisal-requirements-for-neighbourhood-plans/</u>



Annex 2 of the SEA Directive lists a series of criteria that should be taken into account when establishing the potential for the plan to result in significant effects. Furthermore, Annex 1 of the Directive lists a series of broad environmental issues that should be considered.<sup>2</sup> The criteria/issues listed in the Directive are helpful in that they provide a methodological basis for screening.

#### The emerging Cranleigh Neighbourhood Plan

The CNP is being prepared by Cranleigh Parish Council, under the Neighbourhood Planning (General) Regulations 2012. Once adopted ('made') it will present planning policy and guidance for parish of Cranleigh. Alongside the Waverley Local Plan, it will provide a framework for determining planning applications over the next 15 years.

The intention is for CNP policies to address objectives relating to:

- Economy;
- Transport;
- Housing;
- Environment,
- Design and Heritage; and
- Infrastructure/Community.

A key overarching aim of the Neighbourhood Plan is to regenerate the village centre, including through achieving a 'reconfigurated streetscape'.

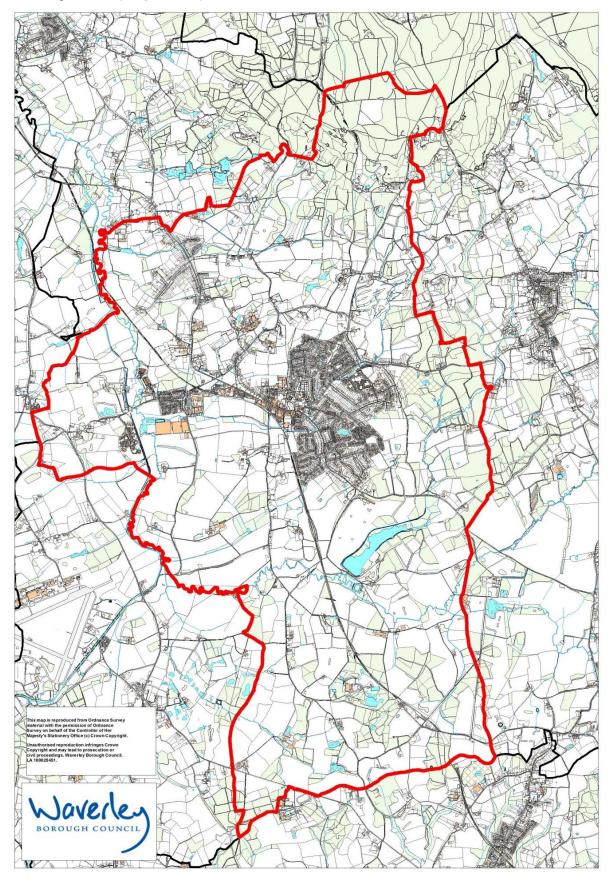
An early unpublished draft version of the CNP has been seen by AECOM (which, it is recognised, is subject to change). Points to note from this draft include the following -

- No site allocations are proposed; indeed, all draft policies are thematic, rather than spatial.
- There is considerable support for schemes that deliver additional car parking.
- There is general support for the expansion of existing retail and commercial uses, and a desire to attract new businesses (including by ensuring that housing and infrastructure is in place).

<sup>&</sup>lt;sup>2</sup> Also, when identifying 'issues' as part of screening, it is appropriate to give consideration to the presence and condition of 'sensitive areas' as defined by national guidance at: <u>http://planningguidance.communities.gov.uk/blog/guidance/environmental-impact-assessment/screening-schedule-2-projects/interpretation-of-project-categories/</u>. These sensitive areas are defined for the purpose of Environmental Impact Assessment (EIA) screening, as opposed to SEA screening, but are nonetheless relevant.



Cranleigh Parish (the plan area)





#### **Relevant environmental issues locally**

Cranleigh is located to the east of Waverley Borough, in the southern part of Surrey. Cranleigh is 10km east of Godalming, 15km south east of Guildford, and 18km north west of Horsham. Cranleigh has a population of around 11,500.

Cranleigh is widely understood<sup>3</sup> to be 'relatively unconstrained environmentally' in comparison to the other three main settlements in Waverley (Farnham, Godalming and Haslemere), all of which are heavily constrained by landscape and/or biodiversity designations; however, there are nonetheless numerous issues to take into account.

The following bullet points aim to present a systematic, albeit brief, consideration of key issues locally -

- No Special Areas of Conservation (SACs) or Special Protection Areas (SPAs) are present within
  or in close proximity. The Mens SAC is c.9km south; Ebernoe Common SAC c.9km south west;
  and Thursley, Ashe, Pirbright and Chobham SAC is c.9km west.
- No Sites of Special Scientific Interest (SSSIs) are present within or close proximity.
  - Chiddingfold Forest SSSI is located just under 3km to the south west, comprising a number of areas of woodland which together form the largest more or less continuous area of oakwoods on the Weald Clay. The site is in 'unfavourable recovering' condition.
  - Smokejack Claypit SSSI is a geological SSSI located 2.5km east of parish boundaries, comprising a pit in the lower Weald Clay Group. It is important for depositional environments and faunas, having yielded a range of important fossils. The site is in 'favourable' condition.
  - Leith Hill SSSI is located c.3.5km east of the northern parts of the parish, comprising a wide variety of woodland habitats, some of restricted distribution, which have developed under the influence of underlying geology and past management. It supports a diverse community of important species, and is in 'unfavourable recovering' condition.
  - Blackheath SSSI is located c.4km north west of the parish, comprising an example of a formerly more extensive area of dry lowland heath and acid grassland on the Bargate and Folkestone Beds of the Lower Greensand. The area of heathland has suffered a 40% decline nationally since 1950, but at this site conservation management has maintained open heath, and restored other areas which were becoming shaded-out by tree growth. The site supports numerous species of conservation concern, and is in 'unfavourable recovering' condition.
- In terms of designated landscapes: the South Downs National Park is located approximately 8km south of the parish; the Surrey Hills AONB covers the northern quarter of the parish, with the boundary c.300m north of the built up area; and locally designated Areas of Great Landscape Value (AGLV) which extend and are essentially designated to 'compliment' the AONB extend into the western and eastern extents of the Parish, some distance from the built-up area. Also of note is the Down's Link, a long distance footpath that runs through Cranleigh.
- In terms of heritage assets: there are no World Heritage Sites to mention; two scheduled monuments are located within the parish (Medieval moated site west of Vachery Farm and Ringwork in Broomhall Copse), although neither is in close proximity to the built up area; the Cranleigh Conservation Area is centred on three main areas of Cranleigh village (the historic core to the east of the village; 16/17th century buildings and a 14th century church in the vicinity of the main shopping area of the village; and an area of the village to the west with a more rural feel); and there are 81 nationally listed buildings in the parish (27 of which are within the Conservation Area), including one Grade II\* listed building (the Church of St Nicholas) and 80 Grade II listed buildings; and there are numeorus Buildings of Local Merit.

<sup>&</sup>lt;sup>3</sup> See, for example, Table 11.1 of the September 2014 Interim SA Report published as part of the Local Plan consultation.



- The north west edge of the built up area is notably constrained by flood risk.
- Traffic is not known to be a particular issue within Cranleigh, and there are no designated Air Quality Management Areas (AQMAs), unlike at Farnham and Godalming. There are nine bus routes that service the Cranleigh area, operated by five different bus operators. The 24, 25, 42, 53 and 63 services run on an hourly or every other hour basis, with most of the other services only running one trip on one or two weekdays. Only the 53 service runs on Sunday. There is a good service between Cranleigh and Guildford, with a combined frequency of 4 uses/hour from the 24, 53 and 63 services.
- The A281 to Guildford has been the focus of recent Transport Assessment work, given that there may be a need to accommodate considerable growth at Dunsfold Aerodrome and/or Cranleigh.
- In terms of the local population: there is an aging demographic with fewer people aged between 20 and 40. The ratio of employees to residents is 1.39, notably lower than Farnham (1.64). The Index of Multiple Deprivation data does not highlight any areas of relative deprivation.
- In terms of services/facilities, Cranleigh has a large health centre with restricted services which means that residents have to travel to the Royal Surrey County Hospital in Guildford; Snoxhall Fields provides a large recreation area, and a play park, and there are two other playgrounds as well as public tennis courts and allotments

#### **Screening analysis**

There is currently some uncertainty regarding the role that will be played by the CNP in terms of allocating land for housing and employment, but for the purposes of screening at the current time it is assumed that -

- The quantum of development will be determined by the Waverley Local Plan, and the CNP will not look to allocate land to deliver a quantum over and above the Waverley Local Plan figure;
- The Waverley Local Plan will allocate strategic sites, leaving the CNP to allocate non-strategic sites (albeit it is noted that the draft FNP did not include housing allocations); and
- The CNP may ultimately need to allocate land to deliver a significant number of homes, recognising that the 2014 Local Plan 'Potential Housing Scenarios' consultation document considered a high growth scenario for Cranleigh involving c.1,450 new homes (2013 2031) over and above the c.350 that have already been built or committed in Cranleigh since 2013. This high growth strategy which to reiterate is just one option under consideration by the Council would equate to a percentage increase in dwelling stock of c.35%.

The implication is that the 'plan scope' does not enable the CNP to be screened-out (i.e. it is not the case that the plan is set to be very limited in its scope).

The next question relates to the nature of the issues (constraints and opportunities) that exist. From the discussion above, it is apparent that there few 'headline' issues, but that there are numerous minor issues that might helpfully be the focus of assessment work, with a view to ensuring that problems are addressed (avoided or mitigated) and opportunities realised. Also, the strong possibility that there will be a new settlement developed at nearby Dunsfold Aerodrome within the plan period is a notable consideration, as it highlights the potential for cumulative effects.



#### **Conclusion (Screening opinion)**

After having given consideration to the anticipated scope of the CNP, and the relevant issues locally, there is evidence to suggest the potential for significant effects to arise as a result of the plan. As such, the plan will need to be prepared with due care and attention to potential effects; and SEA should be applied as a tool to ensure that this is the case. There is considerable uncertainty - given that this conclusion is reached primarily on the basis of the 'plan scope', which is liable to change - however, it is appropriate to take a precautionary approach.

#### Next steps

Waverley Borough Council, as the responsible authority, should give consideration to this screening opinion ahead of reaching a screening determination. In line with Regulations, the Council should also consult with the Statutory Consultees (Natural England, Historic England and the Environment Agency).<sup>4</sup>

If the plan is ultimately 'screened-in', then the Parish Council should commence SEA at the earliest opportunity. SEA is essentially a four step process: 1) Scoping; 2) Assessment of alternatives;<sup>5</sup> 3) Assessment of the draft plan and publication of the Environmental Report (i.e. a report that presents an assessment of the draft plan and alternatives) for consultation alongside the draft plan; and 4) Finalisation of the plan in-light of the Environmental Report and consultation responses.<sup>6</sup>

Please do get in touch with any queries regarding this SEA screening opinion, or next steps.

Yours sincerely for **AECOM Infrastructure & Environment UK Limited** 

Mark Fessey Principal Consultant Mark.fessey@aecom.com

<sup>&</sup>lt;sup>4</sup> Regulation 9(2a) of the Environmental Assessment of Plans and Programmes Regulations 2004

<sup>&</sup>lt;sup>5</sup> The Regulations establish a need to assess 'reasonable alternatives'. There will be a need to give careful thought to what this means in the context of the CNP, but it seems likely that it will be appropriate ('reasonable') to develop and assess alternative broad spatial approaches to housing growth. <sup>6</sup> Guidance on the SEA process is available at:

http://planningguidance.planningportal.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/sustainability-appraisal-requirements-for-neighbourhood-plans/

# Appendix 2 – full responses

Date: 19 February 2016 Our ref: 177138 Your ref: Neighbourhood Plan

Ian Motuel Waverley Borough Council planconsult@waverley.gov.uk

**BY EMAIL ONLY** 



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

T 0300 060 3900

Dear lan,

**Neighbourhood Plan consultation:** Cranleigh and Farnham Neighbourhood Plan - draft screening opinions

Thank you for your consultation on the above dated 25 January 2016 which was received by Natural England on the same day.

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)

It is our advice, on the basis of the material supplied with the consultation, that, in so far as our strategic environmental interests are concerned (including but not limited to statutory designated sites, landscapes and protected species, geology and soils), that there is potential to be significant environmental effects from the proposed plans on sensitive sites.

## **Neighbourhood Plan**

Guidance on the assessment of Neighbourhood Plans in light of the SEA Directive is contained within the <u>National Planning Practice Guidance</u>. The guidance highlights three triggers that may require the production of an SEA, for instance where:

- 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.

We have checked our records and based on the information provided, we can confirm that in our view that both Cranleigh and Farnham's Neighbourhood Plans have the potential to cause significant effects on sensitive sites that Natural England has a statutory duty to protect. We note that there is potential for both Plans to allocate sites for development, but these are not specifically stipulated currently.

Natural England advise that we concur with the conclusion reached by Aecom in their SEA screening assessment for both the Cranleigh and Farnham Local Plans, which concluded that both should undertake a SEA. In addition to this Farnham Parish Council must also undertake a full Habitats Regulation Assessment (HRA), as both the Thames Basin Heaths Special Protection Area



Page 1 of 3

(SPA), and the Thursley, Hankley and Frensham Commons SPA and Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC), are present with this Parish.

The following sites have been identified as being potentially significantly affected by the **Cranleigh Neighbourhood Plan**:

- Smokejack Clay Pit Site of Special Scientific Interest (SSSI)
- Chiddingfold Forest Site of Special Scientific Interest (SSSI)
- Blackheath Site of Special Scientific Interest (SSSI)
- Leith Hill Site of Special Scientific Interest (SSSI)
- Surrey Hills Area of Outstanding Natural Beauty (AONB)

The following sites have been identified as being potentially significantly affected by the **Farnham Neighbourhood Plan**:

- Thames Basin Heaths Special Protection Area (SPA)
- Thursley, Hankley and Frensham Commons Special Protection Area (SPA)
- Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC)
- Bourley and Long Valley Site of Special Scientific Interest (SSSI)
- Thursley, Hankley and Frensham Commons Site of Special Scientific Interest (SSSI)
- Moor Park Site of Special Scientific Interest (SSSI)
- Gong Hill Site of Special Scientific Interest (SSSI)
- Surrey Hills Area of Outstanding Natural Beauty (AONB)

Natural England have no evidence of potential effects on the above having been assessed within a Local Plan since Waverley Borough Council do not currently have one in place. We therefore consider that there should now be an assessment in order to determine the potential impact on these sensitive sites and what possibilities exist for the avoidance/mitigation of the effects. Such an assessment should discuss all of the implications the Cranleigh and Farnham Neighbourhood Plans will have on the above mentioned sites.

Notwithstanding this advice, Natural England does not routinely maintain locally specific data on all potential environmental assets. As a result the responsible authority should raise environmental issues that we have not identified on local or national biodiversity action plan species and/or habitats, local wildlife sites or local landscape character, with its own ecological and/or landscape advisers, local record centre, recording society or wildlife body on the local landscape and biodiversity receptors that may be affected by this plan.

Please note that Natural England reserves the right to provide further comments on the environmental assessment of the plan beyond this SEA and HRA screening stage, should the responsible authority seek our views on the scoping or environmental report stages. This includes any third party appeal against any screening decision you may make.

## Other advice

We would expect the Local Planning Authority (LPA) to assess and consider the other possible impacts resulting from this plan:

- local sites (biodiversity and geodiversity)
- local landscape character
- local or national biodiversity priority habitats and species.
- protected species

Natural England does not hold locally specific information relating to the above. These remain material considerations and we recommend that you seek further information from the appropriate



Page 2 of 3

bodies (which may include the local records centre, your local wildlife trust, local geoconservation group or other recording society and local landscape characterisation documents, in order to ensure the LPA has sufficient information to fully understand the impact of the plan. A more comprehensive list of local groups can be found at <u>Wildlife and Countryside link</u>. Natural England's advice on protected species can be accessed <u>here</u>.

## **Biodiversity enhancements**

This plan may provide opportunities to incorporate features into the design which are beneficial to wildlife, such as the incorporation of roosting opportunities for bats or the installation of bird nest boxes. This is in accordance with Paragraph 118 of the NPPF. Additionally, we would draw your attention to Section 40 of the Natural Environment and Rural Communities Act (2006) which states that '*Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity*'. Section 40(3) of the same Act also states that '*conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat*'.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter <u>only</u> please contact Sophie Temple on 0300 060 1487. For any new consultations, or to provide further information on this consultation please send your correspondences to <u>consultations@naturalengland.org.uk</u>.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely

Sophie Temple Thames Valley Team Sustainable Development and Regulation



Page 3 of 3



Rebecca Grafton Planning Policy Technician Waverley Borough Council

Rebecca.Grafton@waverley.gov.uk By email only Our ref: Your ref:

Telephone

Fax

2016.02.18 Farnham and Cranleigh NP SEA Screening HE RLS Comments 01483 252028

18<sup>th</sup> February 2016

# Dear Rebecca

# **Cranleigh and Farnham Neighbourhood Plan SEA Screening Opinions**

Thank you for consulting Historic England on the Screening Opinions prepared with regard to the need for Strategic Environmental Assessment of the Cranleigh and Farnham Neighbourhood Plans. I am pleased to confirm that we agree with both screening opinions that SEA should be required, in coming to this opinion we have taken the following factors into account:

# Farnham Neighbourhood Plan

- The neighbourhood plan contains a number of designated heritage assets, in addition to numerous non-designated heritage assets and, potentially, previously unidentified heritage assets;
- The neighbourhood plan is expected to allocate land for a large number of residential units, or to impose a settlement boundary, which will have a similar impact in controlling the location of new development;
- The Neighbourhood plan may also include proposals for other lands use allocations in areas containing heritage assets (such as the town centre) including archaeological remains;
- Impacts to heritage assets, where they occur, are required by National Planning Policy and in some cases by legislation to be considered in terms of their impact on the significance of the heritage assets including impacts to their setting;
- Heritage assets are a fragile, irreplaceable resource and, as such, impacts to them are likely to be irreversible or long term;





 Proposals have not been subject to SEA at a suitable level of detail for a higher-level document or may differ from proposals assessed for higher-level documents.

As such we conclude that SEA of the plan should be required as a result of likely significant environmental effects to the historic environment and cultural heritage of the plan area.

Cranleigh Neighbourhood Plan

- The Cranleigh Neighbourhood Plan is at an early stage of preparation and, at present it isn't clear whether it will allocate sites for particular land uses;
- The screening opinion suggests that it may, however, allocate sites for a large number of residential uses to determine the outcome of an expected allotment within the District Local Plan;
- However, the draft neighbourhood plan referred to in the opinion did not include housing allocations and it is a matter for the community to determine whether the plan will do this rather than a requirement that can be imposed by the local planning authority;
- The area contains a number of heritage assets including a conservation area and numerous listed and locally listed buildings (Buildings of Merit), two scheduled monuments and non-designated sites recorded on the Historic Environment Record, as well as having the potential for previously unidentified heritage assets;
- Impacts to heritage assets, where they occur, are required by National Planning Policy and in some cases by legislation to be considered in terms of their impact on the significance of the heritage assets including impacts to their setting;
- Heritage assets are a fragile, irreplaceable resource and, as such, impacts to them are likely to be irreversible or long term;
- Proposals have not been subject to SEA at a suitable level of detail for a higher-level document or may differ from proposals assessed for higher-level documents.

We agree that, at present, there is sufficient doubt over whether the plan is likely to result in significant environmental effects that the default position that SEA should be required is sensible due to the potential scope of the plan. However, there is potential that the provision of further information, or the clarification of the intended scope of the plan, could demonstrate that SEA will not be required, in which case we would be happy to review our comments.





I hope this response is of assistance to the Borough Council but would be happy to answer any questions it may raise or to provide further information that may be of assistance.

Yours faithfully

Robert Lloyd-Sweet Historic Places Adviser (South East England) Historic England Guildford Tel. 01483 252028 E-mail: <u>Robert.lloydsweet@HistoricEngland.org.uk</u>



Historic England, Eastgate Court, 195-205 High Street, Guildford GU1 3EH Telephone 01483 25 2020 HistoricEngland.org.uk Please note that Historic England operates an access to information policy. Correspondence or information which you send us may therefore become publicly available.



## Jennie Falconer

From:	Planning-Farnham <planning-farnham@environment-agency.gov.uk></planning-farnham@environment-agency.gov.uk>
Sent:	Wednesday 17 February 2016 19:10
То:	Rebecca Grafton
Subject:	RE: 2243 - Farnham and Cranleigh Neighbourhood Development Plans

Dear Rebecca,

Thank you for your consultation about the Farnham and Cranleigh neighbourhood development plans, which was forwarded to us by our enquiries unit. We have read the screening opinions prepared by AECOM for both Cranleigh and Farnham. We note that in both cases the quantum of development within the neighbourhood area is to be determined by the Waverley Local Plan, and that neither neighbourhood plan will look to allocate land to deliver a quantum above the Waverley local Plan figure. We note that in both cases, the Waverley local plan will allocate strategic sites, leaving the two neighbourhood plans to allocate non-strategic sites. We note too that both neighbourhood plans may ultimately need to allocate land to deliver a significant number of homes. We have reviewed the environmental constraints for the two neighbourhood plan areas. We concur with AECOM that in both cases, there is evidence to suggest the potential for significant environmental effects to arise as a result of the plan.

We hope that this is of use. Please contact us again if you have any questions or require any further information.

Yours sincerely,

Judith Johnson Sustainable Places team

Environment Agency - West Thames (Farnham) Goldcrest House, Alice Holt Lodge, Farnham, Surrey. GU10 4LH

www.gov.uk/government/organisations/environment-agency team email: planning-farnham@environment-agency.gov.uk

tel: 01252 729625

Note that I work part-time, and my usual working days are Monday, Tuesday & Wednesday

From: Rebecca Grafton [mailto:Rebecca.Grafton@waverley.gov.uk]
Sent: 25 January 2016 16:36
To: Enquiries, Unit
Cc: Ian Motuel
Subject: Farnham and Cranleigh Neighbourhood Development Plans

Dear Sirs,

Please see attached draft 'screening opinions' on whether two proposed neighbourhood plans will require a strategic environment assessment. I also attach a letter giving more details on this consultation.

I would be grateful for your response by Friday 19 February.

Kind regards

Rebecca