

# Strategic Environmental Assessment (SEA) of the Chiddingfold Neighbourhood Plan

Environmental Report Update

Non-Technical Summary

July 2020

## Quality information

Prepared by	Checked by	Verified by	Approved by
Cheryl Beattie Senior consultant	Mark Fessey Associate Director	Nick Chisholm-Batten Associate Director	Nick Chisholm-Batten Associate Director
Chris McNulty Senior consultant			

## Revision History

Revision	Revision date	Details	Authorized	Position
V1	June 2019	Env Report for Regulation 14 consultation	HJ	Nexus Planning (on behalf of the NPSG)
V2	June 2020	Draft Env Report Update for review	As above	
V3	June 2020	Env Report Update for submission	As above	

### Prepared for:

Chiddingfold Neighbourhood Plan Steering Group (NPSG)

### Prepared by:

AECOM Limited  
3rd Floor, Portwall Place  
Portwall Lane  
Bristol BS1 6NA  
United Kingdom  
T: +44 117 901 7000  
aecom.com

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# 1. Introduction

AECOM is commissioned to lead on Strategic Environmental Assessment (SEA) in support of the emerging Chiddingfold Neighbourhood Plan (CNP).

The CNP is being prepared by Chiddingfold Neighbourhood Plan Steering Group (NPSG), with coordination and oversight by Chiddingfold Parish Council, in the context of the adopted Waverley Local Plan Part 1: Strategic Policies and Sites (2013-2032) (LPP1), and the emerging Local Plan Part 2: Site Allocations and Development Management Policies (LPP2). Once the CNP has been 'made' it will have material weight when deciding on planning applications, alongside the Waverley Local Plan.

SEA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating negative effects and maximising the positives. SEA of the CNP is a legal requirement.<sup>1</sup>

The CNP is at an advanced stage of preparation, with the 'pre-submission' version having been published for consultation, with the Environmental Report published alongside, in 2019. The CNP has now been updated for submission to Waverley Borough Council, with an Environmental Report Update alongside.

This is a Non-technical Summary (NTS) of the Environmental Report Update.

## Structure of the Environmental Report Update / this NTS

SEA reporting essentially involves answering the following questions in turn:

1) What has plan-making / SEA involved **up to this point**?

- Including in relation to 'reasonable alternatives'.

2) What are the SEA findings **at this stage**?

- i.e. in relation to the draft plan.

3) What happens **next**?

Each of these questions is answered in turn below. Firstly though there is a need to set the scene further by answering the question 'What's the scope of the SEA?'

## What's the scope of the SEA?

The scope of the SEA is reflected in a list of topics and objectives. Taken together, this list indicates the parameters of the SEA, providing a methodological 'framework' for assessment.

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<sup>1</sup> Regulation 15 of the Neighbourhood Planning Regulations (2012, as amended) requires that each Neighbourhood Plan is submitted to the Local Authority alongside either: A) an environmental report; or, B) a statement of reasons why SEA is not required, prepared following a 'screening' process completed in accordance with Regulation 9(1) of the Environmental Assessment of Plans and Programmes Regulations ('the SEA Regulations'). The CNP was subject to screening in 2018, including through consultation, at which time it was determined that SEA *is* required.

*Table A: The SEA framework*

SEA topic	SEA objective
Biodiversity and geodiversity	Protect and enhance all biodiversity and geological features.
Climate change	Reduce the contribution to climate change made by activities within the Neighbourhood Plan area.
	Support the resilience of the Neighbourhood Plan area to the potential effects of climate change, including flooding.
Historic environment	Protect and enhance the character and quality of landscapes and townscapes.
Landscape	Protect, maintain and enhance the cultural heritage resource within the Neighbourhood Plan area, including the historic environment and archaeological assets.
Land, soil and water resources	Ensure the efficient and effective use of land.
	Promote sustainable waste management solutions that encourage the reduction, re-use and recycling of waste.
	Use and manage water resources in a sustainable manner.
Population and community	Cater for existing and future residents' needs as well as the needs of different groups in the community, and improve access to local, high-quality community services and facilities.
	Reduce deprivation and promote a more inclusive and self-contained community.
Health	Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures.
	Improve the health and wellbeing of residents within the Neighbourhood Plan area.
Transportation	Promote sustainable transport use and reduce the need to travel.

## 2. Plan-making/ SEA up to this point

An important element of the required SEA process involves assessing 'reasonable alternatives' in time to inform development of the draft proposals, and then publishing information on reasonable alternatives for consultation alongside the draft proposals.

As such, Part 1 of the Environmental Report Update explains how work was undertaken to develop and assess a 'reasonable' range of alternative approaches to the allocation of land for development, or 'growth scenarios'. Specifically, Part 1 of the report –

- 1) Explains the process of **establishing** growth scenarios
- 2) Presents the outcomes of **assessing** the growth scenarios
- 3) Explains reasons for **establishing** the preferred scenario, in light of the assessment

## Establishing growth scenarios

The main report explains how growth scenarios were established, appraised and published for consultation in 2019, and then subsequently updated in 2020, subsequent to a process of considering strategic options/parameters alongside the site options in contention for allocation.

Ultimately, it was determined that whilst some sites can reasonably be held constant across the growth scenarios (H1, H2/3, H8A, H9-13, H18A, H27), four sites should be a variable namely:

- Site H6/7 – proposed allocation of this site for 60 homes, in accordance with a published masterplan, remained the NPSG’s preferred approach following review of pre-submission consultation responses; however, it is considered appropriate to explore lower growth options, and the option of non-allocation, recognising that the site falls within the AONB.
- Site H32 – 10 homes was considered a realistic capacity in 2019, and this assumption was not questioned by the site promoters through their consultation response.
- Site H5 – the site promoters suggest a yield of 30 homes; however, it is considered that 20 homes may be more realistic, given constraints and green infrastructure considerations.
- Site H15/15a – this site performs relatively poorly, such that it would only be considered for allocation if absolutely necessary, to meet a shortfall against the target. 10 homes was considered a realistic capacity in 2019, and this assumption has not been questioned.

On this basis, and also mindful of the housing target set by the Local Plan, which is 130 homes, five reasonable growth scenarios emerged - see **Table B**. As per the 2019 growth scenarios, the updated growth scenarios can be characterised, in summary, as: *The NPSG’s emerging preferred option (Scenario 1) plus alternative approaches involving fewer homes at Site H6/7, with the resulting shortfall made up by one or more omission sites.*

*Table B: The reasonable growth scenarios (2020)*

Supply		Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5
Completions and commitments		20	20	20	20	20
Allocations	H1, H2/3, H8A, H9-13, H18A, H27	51	51	51	51	51
	H6/7	60	50*	40**	60	-
	H32	-	10	-	-	10
	H5	-	-	20	20	30
	H15/15a	-	-	-	-	10
<b>Total homes</b>			<b>131</b>		<b>151</b>	<b>121</b>
<b>+/- target</b>			<b>+1</b>		<b>+20</b>	<b>-10</b>

\* Non allocation of Site H6 and an additional ~10 homes at Site H7

\*\* Non allocation of Site H6

### How do these differ to 2019 scenarios?

The reasonable growth scenarios are as per those assessed (and published for consultation) in 2019, except that account has been taken of updated evidence / understanding in respect of certain sites. In particular, in light of the consultation response received from the promoter of Site H5 it is considered reasonable to include this site within the updated growth scenarios. Having done so, and unlike in 2019, it becomes possible to foresee a higher growth scenario involving a more comprehensive approach to growth across the north-eastern edge of the village (Scenario 4) and a scenario involving non-allocation of Site H6/7 (Scenario 5).

## Assessing the growth scenarios

The table below presents appraisal findings in relation to the growth scenarios. With regards to methodology: Within each row (i.e. for each of the topics that comprise the SEA framework) the columns to the right hand side seek to both **categorise** the performance of each option in terms of 'significant effects' on the baseline (using **red / green**) and also **rank** the alternatives in order of performance. Also, '=' is used to denote instances where the alternatives perform broadly on a par.

The appraisal matrix is followed by a discussion, setting out reasons for the appraisal conclusions reached, with reference to available evidence. N.B. significant effects are discussed only where there is a notable conclusion, i.e. where there is a prediction of significant effects.

*Table 6.1: Growth scenarios assessment findings (2020)*

Objective	Scenario 1 H6/7	Scenario 2 H7+, H32	Scenario 3 H7, H5	Scenario 4 H5/6/7	Scenario 5 H32, H5, H15
Biodiversity	2	★1	2	2	2
Climate change	2	★1	2	3	4
Historic environment	★1	3	★1	★1	2
Landscape	★1	4	★1	2	3
Land, soil & water resources	=	=	=	=	=
Population & community	2	2	2	★1	3
Health	=	=	=	=	=
Transportation	=	=	=	=	=

### Discussion

The assessment shows Scenarios 1, 3 and 4 to perform relatively well, in that they perform well against some objectives without any predicted significant negative effects. Scenario 2 performs well in certain respects, but notably poorly in others. Scenario 5 (a low growth option) generally performs poorly.

Having made these initial points, the following bullet points consider the merits of the growth scenarios under each of the topic headings in turn:

- **Biodiversity** - there is a very high density of ancient woodland in the plan area, as well as other woodland priority habitat. The Chiddingfold SSSI is a large complex of woodlands in the southeast of the plan area, but quite distant (at least 1.5km) from the main village (i.e. that part with a defined settlement boundary) and hence the site options under consideration here.

Focusing on the main village, the main concentration is to the north of the village, including in close proximity to Sites H5 and H6, plus mature hedgerow / narrow woodland strips separate Site H5 from H6 and Site H6 from H7, both joining to the ancient woodland to the north, and with the latter following the course of a narrow stream.

The other sites in question are not thought to be associated with any significant biodiversity value, although Site H15/15a includes mature trees, and Site H32 is adjacent to an area of priority woodland habitat (accessible and a focus of local conservation efforts), and also bounded by mature hedgerows.

A key question relates to the approach to growth at Sites H5/6/7. This is clearly a sensitive location, which on one hand potentially suggests a need to restrict development, but on the other hand potentially suggests an opportunity to deliver targeted enhancements. Natural England has commented that Site H5 may be associated with a degree of opportunity,<sup>2</sup> but also notes a degree of caution ahead of ecological survey findings,<sup>3</sup> and, furthermore, Natural England suggests that there could be merit in comprehensive approach to planning across Sites H5/6/7.<sup>4</sup>

In **conclusion**, Scenario 2 performs best, as neither Site H5 nor Site H6 would be allocated, hence there would not be a need to breach the mature hedgerows / woodland belts, nor encroach on the woodland patches to the north; and it is not possible to differentiate between the other scenarios with any confidence. On one hand Scenario 1 performs poorly as it would breach the mature hedgerows / woodland belts (also a narrow stream corridor) without enabling a comprehensive approach to planning for this part of the village edge; however, on the other hand, Scenarios involving allocation of Site H5 potentially perform poorly given onsite, adjacent and nearby constraints.

- **Climate change** - the key consideration here is climate change adaptation, and in particular the need to avoid areas of flood risk. None of the sites in question are subject to fluvial flood risk; however, surface water flood risk does significantly affect the northern part of Site 15/15a (potentially creating a challenge in respect of site access), and also Sites H5, H6 and H7. Specifically, the aforementioned narrow stream corridor separates Sites H6 and H7, and the access road to Site H5 appears to form a surface water flood risk corridor.

In **conclusion**, Scenario 2 performs best, as none of the sites affected by surface water flood risk would be allocated. Scenario 4 performs relatively poorly, as two sites affected by surface water flood risk would be allocated (Sites H5 and H6); however, there would be good potential for comprehensive masterplanning of the three adjacent sites to ensure well designed 'green and blue infrastructure', such that flood risk is avoided or suitably mitigated. Scenario 5 performs least well, as two sites affected by surface water flood risk (and specifically affecting site access) (Sites H5 and H15) would be allocated.

- **Historic environment** - Sites H5, H6 and H7 perform well in historic environment terms as they fall outside of the Conservation Area, and a landscape buffer at the eastern extent of Site H7 (potentially not achievable under Scenario 2) is also supported, from a perspective of preserving the setting of the Conservation Area. The other sites fall within the Conservation Area, with Site H32 potentially giving rise to greater concern, given a Grade II listed building (Coxcombe Cottages) close to its access point.

In **conclusion**, Scenario 2 performs poorly, and may give rise to a risk of a cumulative significant negative impact on the Conservation Area (due to allocation of Site H32 and higher growth at Site H7).

- **Landscape** - Natural England and the AONB Unit are supportive of a 60 home scheme at Site H6/7, on the basis that this land is well contained visually, in particular given the hill to the north (although a footpath does run adjacent) and go as far as to suggest, through their Regulation 14 consultation response that: *"The sites allocated within the draft plan appear to be the most acceptable in landscape terms."* However, the promoters of Site H5 have submitted detailed evidence to suggest that Site H5 is preferable to Sites H6/7 in landscape terms, and that there would be merit to comprehensively planning for all three sites in combination. There are also issues / sensitivities associated with Site H15/15A (which would be visible from the main road and cricket pitch, which is designated common land) and Site H32 (which comprises rising / raised land visible from a number of locations in the vicinity). Also, as per the discussion above, under Historic Environment, there is a need to avoid a higher density of development at Site H7, which would likely mean a need to deliver houses across the whole site, rather than leaving the eastern portion undeveloped as a landscape buffer.

<sup>2</sup> Natural England's advice to the promoters of Site 5 states that there may be the opportunity to increase access to the woodland to the north (also an associated public footpath), which is in the same ownership as the site. Natural England also state: *"Using green SuDS would add another dimension and supplement the pond at the lower edge. By linking new woodland access to the wider green infrastructure including imaginative play areas, such as those based on natural play, there is the opportunity to provide community facilities, identified by the local community as a priority, for both existing and any new residents."*

<sup>3</sup> The consultation response received from the site promoter states: *"In respect of ecology, the evidence, Appendix 4, followed various site surveys in June/ July / August 2019, and demonstrates that the site is suitable for development, owing to the absence of protected species."* However, the evidence submitted as Appendix 4 notes that further surveying for bats is required, and also does not look beyond onsite habitat and protected species to consider wider impacts to adjacent and nearby habitats, and ecological connectivity between habitat patches.

<sup>4</sup> Natural England's advice to the promoters of Site 5 states: *"We would prefer to see development guidelines along the lines of a concept statement or masterplan to demonstrate a holistic approach to the entire suite of sites (5, 6 & 7) to provide a comprehensive, planned, green infrastructure across the three sites; complementing the landscape, connecting with existing footpaths and providing generous public open space in the most appropriate places."*

In **conclusion**, the performance of the scenarios is broadly as per the discussion presented above, under Historic Environment, although there is a need to strike a note of caution regarding Scenario 4, as a high growth scenario, given the inherent AONB constraint.

- **Land, soil & water resources** - Sites H6 and H7 are currently in agricultural use (with Site H7 a considerably larger field, and the only site in question currently in arable use), and the other sites in question could potentially be brought into agricultural use (although as smaller fields they are associated with relatively low potential for viable use). However, there is no potential to differentiate the sites in terms of the quality of the agricultural land, with the low resolution nationally available dataset showing all land in question to comprise land of 'grade 3' quality (and no land in the vicinity has been surveyed in detail). As such, there is no potential to differentiate the growth scenarios.

Nor is there any potential to differentiate the scenarios in terms of 'water' objectives. Sites H5/6/7 are in close proximity to a narrow stream (with a sewage treatment works a short distance downstream), potentially suggesting a challenge in respect of managing surface water run-off; however, it is not possible to draw strong conclusions, given potential to deliver sustainable drainage systems (SuDS).

- **Population & community** - Sites H6 and H7 are relatively peripheral to the village; however, concerns are not significant, on the assumption that there is a footpath / cycle path that links Site H6 to Woodside Road to the south (ideally with street lighting). There could feasibly be the potential for a development scheme at H32 to support the achievement of community objectives given uses of neighbouring land - namely the village hall to the east, and the land that is a focus of nature conservation efforts to the south - however, nothing has been proposed in this respect. With regards to Site H5, the potential to deliver green infrastructure enhancements (either through the development of the site in isolation, or as part of a comprehensive scheme alongside Site H6/7) has already been discussed; however, on the other hand, the site is currently used informally for recreation (dog walking etc) and was previously considered closely by the NPSG as a candidate site for Local Green Space designation. Also, there is a question-mark regarding safe access, with a detailed study submitted by the site promoters highlighting that the pedestrian footpath would be constrained to 1.2m at one point (there is also a concern regarding surface water flood risk, as discussed).

In **conclusion**, Scenario 5 would fail to achieve the Local Plan housing target and hence would lead to significant negative effects. It is also considered appropriate to flag a degree of opportunity associated with Scenario 4, which would involve a high growth strategy (thereby helping to ensure that the housing target is met in practice, noting that there can be a risk of sites encountering delivery issues) and provide the opportunity for comprehensive masterplanning of this north-eastern edge of Chiddingfold; however, there is considerable uncertainty ahead of any such masterplan.

- **Health** – it is not clear that there is any potential to differentiate the growth scenarios in respect of any health related issues/objectives not already discussed above, under 'Population and community'.
- **Transportation** - Sites H6/H7 and H15/15a would gain access directly from the A283, whilst Site H32 would gain access from Coxcombe Lane, which is a minor road, but with a pedestrian footpath. It is also noted that Site H32 is linked to the primary school to the east by a footpath, and so on this basis (also recalling that this is a small site), it is not considered appropriate, on balance, to flag this site as less preferable. N.B. there are access constraints in respect of Sites H5 and H32, and questions remain in respect of the potential for safe and sufficient access (e.g. access for refuse vehicles); however, for the purposes of this appraisal the potential to achieve access is assumed.

## Establishing the preferred scenario

The following is the NPSG's reasons for supporting Scenario 1:

*"The assessment shows Scenario 1, which is the growth scenario published for consultation in 2019, and that which remains the favoured option at the current time, to perform well in absolute and relative terms. Scenario 3 is shown to perform equally well; however, the Steering Group favours a single linked scheme across Sites H6 and H7 to a more piecemeal approach to growth involve Sites H5 and H7 (also, the Steering Group has particular concerns with Site H5, including in respect of safe access). With regards to Scenario 4, the Steering Group notes the suggestion of the assessment regarding there being merit to putting place a housing supply buffer, but in practice there is a high degree of confidence regarding the potential to achieve the Local Plan housing target under Scenario 1.*

*In summary, Scenario 1 is the most suitable growth option to deliver on the objectives of the CNP, and is consistent with the requirements of the Waverley Local Plan and national planning policy. Sites 6 and 7 were identified in the WBC Local Plan Part 1 as areas which could be released from the Metropolitan Green Belt in order to facilitate the building of 130 homes for Chiddingfold over the plan period (2013 – 2032). Both Natural England and the Surrey Hills AONB Planning Consultant concur with this view, subject to appropriate design and the addition of woodland screening. Surrey County Council Highways Officers concluded that a junction on the A283 providing access to this quantum of development would be acceptable. Further, this site location would avoid increasing traffic pressure within the village centre.”*

## 3. Assessment findings at this stage

Part 2 of the Environmental Report presents an appraisal of the CNP as a whole. Assessment findings are presented as a series of narratives under the ‘SEA framework’ topic headings, with the following overall conclusion:

Overall, the CNP is anticipated to lead to significant positive effects in respect of ‘Population and community’ and ‘Health and wellbeing’ objectives, primarily on the basis of providing for housing needs and proposing policy that will seek to ensure that housing brings with a range of community benefits. Minor positive effects are also predicted in respect of ‘Biodiversity’ and ‘Historic environment’, reflecting the potential for development to deliver environmental benefits.

The proposed spatial strategy gives rise to a number of tensions, including in respect of Climate change (surface water flood risk), Land (loss of agricultural land), Landscape (AONB), and Transport (car dependency) objectives; however, in all cases the conclusion is reached that the proposed policy framework is suitably robust, such that it should be possible to avoid significant negative effects.

## 4. Next steps

### Plan finalisation

Following submission of the CNP and this Environmental Report Update to WBC all submitted documentation will be published for consultation and then subjected to Independent Examination by an appointed Examiner. The Examiner will assess whether the plan meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the Local Plan.

Assuming that the examination leads to a favourable outcome the CNP will then be subject to a local referendum. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be ‘made’ part of the local Development Plan, alongside the Waverley Local Plan.

At the time that the plan is made an SEA Adoption Statement will be published that presents, amongst other things, ‘measures decided concerning monitoring’.

### Monitoring

Policy D3 (Monitoring) of the CNP states that: “Following the adoption of the Neighbourhood Plan, Chiddingfold Parish Council will: “*Seek to meet with Applicants of major planning applications schemes to discuss local infrastructure needs and the features of the development, prior to the preparation of a planning application, through an informal pre-application advice service; and Monitor all planning applications in the Parish to review conformity to the Neighbourhood Plan Policies, providing representations to Waverley Borough Council as required.*”

On the basis of the appraisal findings presented in this report, it is suggested that monitoring might appropriate focus on visual impacts to the AONB, traffic on local roads and also car dependency / propensity to access village services and facilities by walking and cycling.

