

Ewhurst and Ellen's Green 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 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 as Appendix A to this opinion. The screening report reached an initial conclusion that a full SEA would not be required. In accordance with the regulations, Natural England, the Environment Agency and Historic England were consulted on the findings of the screening report on 2 September 2016. The following responses were received (reproduced in full at Appendix B)

Consultation Body	Comment	Waverley Borough Council response
Natural England	<p>We have checked our records and based on the information provided, we can confirm that in our view the Ewhurst Neighbourhood Plan has the potential to cause significant effects on sensitive sites that Natural England has a duty to protect. We note that there is potential for the Neighbourhood Plan and the Local Plan to allocate sites from development, but these are not specifically stipulated currently.</p> <p>Natural England note that AECOM have advised that a full SEA is not required. However, we advise that a SEA screening be conducted in order to identify or screen out any potential risks that the plan may present, alongside relevant discussions on pertinent mitigation.</p> <p>The following sites have been identified as being potentially significantly affected by the Ewhurst Neighbourhood Plan:</p> <ul style="list-style-type: none">• Smokejack Clay Pit Site of Special Scientific Interest (SSSI)• Somersby Wood Site of Special Scientific Interest (SSSI)• Leith Hill Site of Special Scientific Interest (SSSI)• Surrey Hills Area of Outstanding Natural Beauty (AONB). <p>There is no evidence of potential effects on the above having been assessed, and there should now be a</p>	Agree that consideration is required of the potential effects on designated sites.

	screening assessment to determine the potential impact on these sensitive sites and what possibilities exist for avoidance/ mitigation of the effects.	
Environment Agency	<p>We understand that the Neighbourhood Plan will seek to allocate sites for around 50 homes before 2032 but that those sites have not yet been identified.</p> <p>We have identified that the neighbourhood plan area will be affected by the following environmental constraints, and as described think that there are potential significant environmental effects that relate to the Neighbourhood Plan area:</p> <ul style="list-style-type: none"> • Flood Risk: Areas of flood zones 2 and 3 within the Neighbourhood Plan area. If any of the as yet unallocated housing sites are within areas at risk from flooding there is a potential for significant effects. • Main river: An assessment of the potential impacts of the neighbourhood plan on Cranleigh Waters under the Water Framework Directive should be included with the SEA/SA appraisal. 	Agree that consideration of potential effects on flood risk and water quality is required.
Historic England	<p>We note that AECOM identifies the conservation areas at Ewhurst and Ewhurst Green as particularly sensitive areas. It notes that the plan is likely to allocate one or all of three sites for housing for up to 50 units but that impacts to heritage assets is likely to be limited to the setting of a Grade II listed farmhouse and concludes that this is unlikely to be a significant effect.</p> <p>Based on limited information presented, we would agree with the outcome of the screening process, but express reservation at how little information is presented on location of sites and scope of assessment of assessment on potential for impacts on non-designated heritage assets or archaeological sites.</p> <p>We request that this screening opinion is maintained under review as the plan emerges and reserve the right to amend our view as the draft plan emerges.</p>	Agree that consideration of potential effects on heritage conservation is required.

Conclusion

The original screening report concludes that where a Neighbourhood Plan will allocate sites – as is the intention of the Ewhurst and Ellen’s Green Neighbourhood Plan, then this is an indication that SEA is potentially necessary. However, the report states that on balance it seems likely that in the case of Ewhurst and Ellen’s Green Neighbourhood Plan, SEA is not necessary. Following the consultation with the above Statutory Consultees, the responses and were communicated to AECOM. The consultants view, at that time, was that the Neighbourhood Plan group could be invited to adopt a set of plan objectives which could potentially overcome the concerns of the statutory bodies and as such the Plan could then be screened out. However, the Council did not issue a formal screening opinion at that time and would have taken into account the views of the statutory consultees.

Since the screening opinion was requested, Local Plan Part 1 was examined and adopted in February 2018. As a result of the examination, the housing numbers allocated to Ewhurst rose from 65 to 100, with 60 left to be allocated in the Neighbourhood Plan as of 1st April 2017. The consultant's view is that in light of the comments from the Statutory Consultees, together with the increase in the housing allocation the plan should be screened in. The allocation of housing sites in an area determined by the statutory consultees to have environmental interest warrants consideration of reasonable alternatives and an assessment of potential effects from the Ewhurst specific policies. Undertaking an SEA will help Ewhurst Neighbourhood Plan demonstrate how it has met the basic conditions of neighbourhood planning.

The Council determines that the Plan does require an SEA.

Appendix 1 Screening Report



AECOM +44 (0)20 7798 5000 tel
6-8 Greencoat Place, +44 (0)20 7798 5001 fax
London,
SW1P 1PL
T F +44 (0)20 7798 5001
www.aecom.com

1st August 2016

Jennie Falconer
Planning Policy
Waverley Borough Council
The Burys, Godalming
Surrey GU7 1HR

Dear Jennie,

Ewhurst and Ellen's Green Neighbourhood Plan: Strategic Environmental Assessment (SEA) Screening Opinion

Waverley Borough Council has asked that AECOM provide an SEA Screening Opinion in relation to the Ewhurst and Ellen's Green Neighbourhood Plan (EEGNP). This letter presents our Screening Opinion.

Background

One of the so-called basic conditions that a Neighbourhood Plan (NP) must be tested against is whether the making of the NP is compatible with European Union obligations, including requirements 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."

In order to decide whether a proposed NP 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 NPs. 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.¹

Who is responsible for screening?

The SEA Regulations, which transpose the SEA Directive into law, 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 in-light of this screening opinion, and in consultation with the statutory consultation bodies designated under the SEA Regulations (Natural England, the Environment Agency and Historic England). AECOM is well placed to provide a Screening Opinion, given our experience as SEA practitioners for Local and Neighbourhood Plan-making, including with respect to the emerging Waverley Local Plan.

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

Screening methodology

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

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

The emerging Ewhurst and Ellen's Green Neighbourhood Plan

The EEGNP relates to the designated area covered by Ewhurst Parish Council. According to the Parish Council Council, its draft Vision is:

'The Parish of Ewhurst and Ellen's Green will accommodate necessary change that retains and improves its rich biodiversity and rural environment and which sustains its community - its people, its facilities and its heritage.

In 2030, the Parish will still be predominantly rural and undeveloped providing an attractive countryside setting for the village of Ewhurst (including Ewhurst Green), the hamlet of Ellen's Green and the scattering of mainly historic rural development.

Ewhurst village will be the focus of a strong, vibrant, healthy and self-sustaining community and the main location for carefully managed, sustainable development, growth and change. The historic and cultural heritage of the Parish, in both the countryside and the settlements will be retained and improved²

The Draft Objectives for the Neighbourhood Plan have been established as:

1. Objectives for Housing
 - To make provision for the development of sufficient new housing to (i) meet primarily the locally generated need for additional houses, including the needs of those who work in the area and (ii) fulfil the requirements of the Local Development Plan.
 - To allow for a mix of new housing provision which is weighted towards providing for identified local needs in terms of (i) the size, type and affordability of new housing and (ii) housing specifically suitable for the elderly and those with special housing needs.
2. Objective for the Settlements
 - To maintain the separate identity and physical separation of Ewhurst (including Ewhurst Green) and Ellen's Green and to avoid development which would encroach upon the separation between those settlements and settlements and developments beyond the parish boundary.
3. Objectives for the Built Environment
 - To maintain and enhance the character, built environment and heritage of Ewhurst (including Ewhurst Green) and Ellen's Green and to maintain and enhance the merit and value of any historic and heritage built development and sites outside the boundaries of those settlements.

² 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

4. Objectives for the Countryside and Natural Environment

- To seek to maintain for its own right, the character and quality of the countryside and rural areas outside the built-up areas of Ewhurst (including Ewhurst Green) and Ellen's Green.
- To seek to maintain, protect and enhance in all areas including within the settlements, those areas identified as having special environmental, habitat or nature conservation value, qualities and merit – both those subject to statutory and recognised designations and those identified by the Neighbourhood Plan.
- To generally seek to maintain and improve the rich biodiversity and sustainability credentials of all areas of the Parish.

5. Objectives for Community Facilities, Assets and Services

- To seek to ensure that the local facilities, assets and services which are important to and used by the local community, and which play a part in the strength and togetherness of the local community are available in the Parish.

6. Objectives for the Local Economy

- To seek to ensure that the local economy and sources of employment within the Parish can continue to flourish without any detrimental impact on the quality of the environment and health and safety in the countryside and settlements.

It is the intention that the EEGNP will indicate preferred housing development sites sufficient to at least meet the new Local Plan's requirement for housing. Sites for other uses may also be allocated e.g. employment, community, recreation and leisure.

Relevant environmental issues locally³

Geology

The position and north to south orientation of the Parish dictates and makes simple the area's geology. The northern third of the Parish is on the southern scarp slope of the Surrey Hills between the North Downs and the Wealden Basin. It is mainly Lower Greensand with areas of Speeton Clay in hollows and where the slope flattens out. The southern two thirds of the Parish including Ewhurst village is Wealden Clay with a small outcrop of Lower Greensand in the centre of the village and bands of greensand and clay alluvial deposits along the southward flowing streams.

Soils

Given the underlying geology, most of the northern third of the Parish has quite acid, sandy and heavily podalised soils with some slightly less acid clay based soils on lower slopes. The sandstone areas generally drain freely onto the clay soils of the lower slopes. The southern two thirds of the Parish have mainly heavy clay based loamy soil which tends to be slightly acid. The soil of some areas has been improved and given some land drainage but in periods of heavy rainfall many fields can get waterlogged as the underlying clay impedes absorption. Along the streams are narrow bands of more freely draining alluvial soils but these can get overwhelmed by water flowing off adjacent clay soil areas.

Minerals

One small site up Pitch Hill, north of Ewhurst was historically excavated for sandstone but this activity appears to have ceased several decades ago and the site is no longer recognised in the Surrey Minerals Plan. Historically the Wealden Clay in the Parish and neighbouring areas has been an important source of building clay for bricks and tiles, and one permitted and still operating area for extraction of building clay remains straddling the Parish boundary in the vicinity of the eastern half of Somersbury Wood. The Surrey Minerals Plan indicates an agreed Area of Search for building clay extending to the north and west towards Somersbury Lane.

³ Text within this section was initially prepared by the Parish Council, with AECOM subsequently reviewing and editing.

Waste

Apart from a number of small farm waste compounds on local farms, there are no known waste disposal sites. The Surrey Waste Plan does not indicate or propose any waste disposal sites or operations in the Parish. The height of the water table and the proximity of several water courses probably make most of the historical clay excavations unsuitable for waste disposal.

Land-use

In the extreme north of the Parish, most of the land is afforested. Much of this is mainly conifer plantation or secondary regeneration on abandoned heathland. There are also many large and small areas of woodland and tree plantation throughout the Parish, especially to the west and south of Ewhurst and north and west of Ellen's Green. A major portion of the woodland in this area is Ancient Woodland. Near Ewhurst village there are several substantial areas in leisure, recreational and educational use, including Ewhurst Green, Hurtwood Park Polo Club and much of Sayers Croft Outdoor Learning Centre. In the middle of the Parish there are two substantial areas used for commercial purposes.

Part of the site of an old brick works is now used by a car storage, repair and maintenance business, although most of the nearby land from where the clay was extracted has long been abandoned and allowed to return to nature with some excavations full of water. Nearby there is a large modern brick production plant with substantial outside storage areas. Adjacent to this are several areas where clay extraction is on-going (or permitted and planned for in the future).

In between these recreational and commercial land-uses and the wooded and afforested areas, the main land-use is agriculture. Almost all is pasture land, although some areas appear to be underused and not currently farmed, or used only for "horsiculture". The agricultural land quality is mostly Grade 3 (Grade 3b mainly) with small areas of Grade 4 and Grade 5. There is little or no "best and most versatile farmland".

Water Supply, Waste Water and Water Quality

Potable water is supplied to most of the Parish by mains pipe by Thames Water Utilities (UK) Ltd. It is pumped to the northern three quarters of the Parish including Ewhurst village, from "outside sources" to the west and northwest of the area. Water in the southern quarter of the Parish is supplied by Southern Water Services Ltd from adjacent areas of West Sussex. It is understood that there are no "official" water extraction sites within the Parish although it is possible that some farms extract small amounts of water from streams for agricultural purposes.

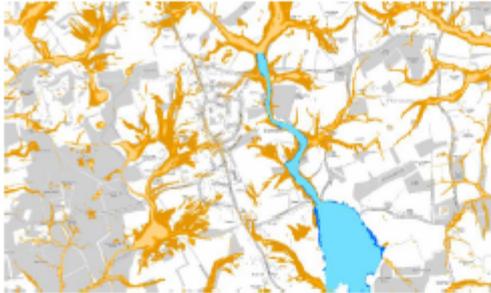
Thames Water Utilities (UK) Ltd and Southern Water Services Ltd provide waste water/sewerage services to the same aforementioned areas, the former from works to the west of the Parish and the latter from its treatment works in Rudgewick. There are no treatment works in the Parish and none of the nearby works feed treated water into local streams.

It is understood that the water quality of most local streams (which are generally small and therefore not regularly monitored) is good to satisfactory, although some in the southern two thirds of the Parish are sometimes "tainted" by agricultural run-off. Officially there have been no serious incidents of pollution affecting water courses in the Parish. However, there is anecdotal evidence of localised pollution from agricultural sources.

Drainage and flooding

The figure below shows fluvial flood risk (blue) and surface water flood risk (orange) in the vicinity of Ewhurst. As can be seen, there are limited issues affecting the village itself, with fluvial flood risk associated with a stretch of Cobblers Brook to the east of the village.

Figure 1: Fluvial (blue) and surface water (orange) flood risk



At the edge of the greensand ridge is a spring line which feeds the streams and drainage ditches which flow to the south. A few of the springs issue out onto roads north of Ewhurst making them continuously wet in places. However because of the fall of land, this rarely results in any large or notable areas of flooding. During periods of heavy, persistent rain, a few roads in Ewhurst and areas to the south also experience localised flooding. This would appear to be due to inadequate or partly blocked road drains and road side ditches. To date there have been no reports of the flooding of property arising from overflow from the streams etc. shown to be at risk in the figure above.

Biodiversity

There are two Nationally Designated Wildlife Sites partly or wholly within the Parish – Smokejack Clay Pit and Somersbury Woods (an SSSI) and Sayers Croft Local Nature Reserve. It should be noted that part of the Smokejack SSSI has been deleted to allow clay extraction. It is understood that the consent requires restoration of the SSSI status once extraction has been completed.

There are a number of recorded and plotted Local Wildlife Sites (SNCIs) in the Parish. There are also many areas identified as Ancient Woodland (both semi-natural and plantation woodland). There are also three lengths of Conservation Verges. Adjacent to and overlapping into the Parish on the western, northern and eastern sides are three large Biodiversity Opportunity Areas. Finally multiple areas throughout the Parish have been included on the Natural England list of Priority Habitats.

Also, work undertaken by local ecologists has identified that most the historic ponds in Ewhurst (of which there are at least five) are believed to have Great Crested Newt populations (protected under the Convention on European Wildlife and Natural Habitats). Work has also been undertaken to establish the location of protected species - notably badger and bat - populations.

Air Quality

The air quality throughout the Parish is generally good and typical for a rural and heavily wooded area in the south of England. There are no major sources of air pollution in or near the Parish. Clay excavation does not give rise to serious air pollution and the brickworks has modern non-polluting furnaces. All major roads and motorways are at least 6 miles from the Parish so there is no air pollution from this source. The B2127 through Ewhurst is carrying an increasingly heavy traffic load including many HGVs and diesel vehicles but at present traffic fumes are likely to have dispersed beyond a few metres from the carriageway. It is, however, worth noting that the Infants school and the village hall which houses a nursery school both lie close by the road in the centre of the Village.

Noise

None of the Parish is prone to seriously high levels of noise (i.e. above permitted levels or levels which could represent a hazard to health) from any source. None of the local industrial operations cause regular high levels of noise. The distance from Gatwick Airport and the height of aircraft means that most of the Parish is not seriously affected by aircraft noise at present. Elen's Green is, however, on the flight path for a westerly approach to the single operational runway and does experience a degree of noise annoyance from aircraft although this is almost certainly well within permitted limits. At present probably more aircraft noise is experienced from the low level flights by helicopters using Dunsfold Airfield.

Cultural and Heritage Assets

As a farming and forestry area with a long history of settlement and use, the Parish is rich in cultural and heritage assets. There are two conservation areas - Ewhurst and Ewhurst Green - and four other areas have been identified as of more local importance. There is a particular concentration of listed buildings within the Ewhurst Conservation Area.

Population

In the 2011 Census, the population of the Parish totalled 2480, with 2150 people living in 923 private households and 330 were living in communal establishments (mainly in several schools). Of the 923 private households, 814 were in the Ewhurst area and 109 around Elen's Green.

Between 2001 and 2011 Census, the population grew by 3.7% from 2391 to 2480. A major component of this was a large increase of those living in a communal establishment for the growth in population living in private households was much less at about 2%. Those aged 0 – 18 years increased by 16.9% and those aged 65 years or more increased by 16.1%. The population aged 18 – 64 however decreased by 4.5%.

Surrey CC projections using cohort survival rates suggest that the Parish population could reach 2831 by 2037. There could be an 300 increase in those aged 65 and over and a 150 increase in those aged 18 – 65, but a decrease of over 100 in those aged under 18.

Housing and Households

In 2011, there were 1010 dwelling units in the Parish. About 27.4% of occupied housing is small (1 or 2 bedrooms) but 37.4% is large (4 or more bedrooms). Nearly 60% of housing in the Parish is detached. Nearly 70% of households were small with only 1 or 2 persons. 35% of households included one or two persons over 65.

According to WBC Planning records there were 19 new house completions in the Parish between 2001 and 2011, with a further 6 completed since then. However the total increase in dwellings between 2001 and 2011 recorded by ONS/the Census was 45 which may be partly accounted for by some sub-division of larger properties, the creation of self-contained units in communal establishments and changes in the definitions used.

Human Health

There are no exceptional problems, issues or characteristics regarding the health of the local population. The local live birth rate is generally comparable with that found across most of Waverley and much of Surrey. Likewise the local death rate is generally comparable to that in Waverley and Surrey. However the Parish does have a slightly older and faster aging population than the average for Waverley and Surrey. Between 2001 and 2011, the proportion of Ewhurst's population aged over 65 increased from 16.1% to 20.1% whereas the proportion for Waverley and Surrey in 2011 was respectively 19.8% and 18%.

Screening analysis

According to the Waverley Local Plan Part 1 (as considered and approved by Full Council on 19 July 2016),⁴ land should be allocated to deliver c. 50 homes before 2032 at Ewhurst,⁵ and it is noted that the 'Sustainability Appraisal (SA) of spatial strategy alternatives' document presented alongside the plan does not consider any spatial strategy option that would involve higher growth at Ewhurst.

Growth of 50 homes is not an insignificant quantum for a "small village" like Ewhurst. The Local Plan proposes a lower growth strategy for some villages of a similar size (Churt, Frensham, Tilford and Wonersh), and a higher growth strategy for some other villages of a similar size (Ailfold and Dunsfold).

Furthermore, there is a likelihood of housing allocations being concentrated in one area, which potentially increases the likelihood of significant effects. Specifically, the NP may choose to allocate the three sites at the western edge of Ewhurst (to the south and southwest of the Sayers Croft Rural Centre) that have been identified as 'suitable' through the Borough Council's Land Availability Assessment (LAA).

There could conceivably be merit in exploring alternative growth locations through an SEA process. However, the likely growth location is seemingly unconstrained, with the main constraint immediately apparent being an adjacent listed building (Gadbridge Farm).⁶ Furthermore, it is not clear that there is an alternative growth strategy that could conceivably be followed, recognising that other available sites are identified as unsuitable by the Waverley LAA. Notably, Hurtwood Park Polo Club is found by the LAA to be unsuitable on the basis of: Impact on the Surrey Hills Area of Great Landscape Value (AGLV); Impact on the landscape; and isolated location.

Conclusion (Screening opinion)

Where a Neighbourhood Plan will allocate sites - as is the intention for the EEGNP (see discussion above) - then this is an indication that SEA is potentially necessary.⁷ However, on balance it seems likely that, in the case of the EEGNP, SEA is not necessary. It is not clear that there would be much to be gained by exploring alternative spatial strategies, and ultimately it seems unlikely that the Plan - given its scope and the environmental issues locally - will result in 'significant effects'. As such, our recommendation is that the Plan is 'screened-out', i.e. need not be subject to SEA.

Next steps

Waverley Borough Council, as the responsible authority, should give consideration to this screening opinion, consult with the Statutory Consultees (Natural England, Historic England and the Environment Agency) and then reach a screening determination.

If the plan is ultimately screened-out, then the Parish Council may continue with plan-making without having to give further thought to SEA requirements; however, they might still deem it appropriate to undertake an SEA-like process, with a view to developing the most sustainable plan.

Finally, it is important to note that our screening opinion is based on a series of assumptions, most notably in relation to the sites that are in contention for allocation through the plan. If the scope of the plan changes, such that these assumptions no longer hold true, then 're-screening' could be necessary.

⁴ <http://www.waverley.gov.uk/infocentre/Document.aspx?DocId=1306&Mid=1796&V=red>

⁵ The target for Ewhurst is 65 homes over the plan period, but 14 homes have already been completed since the start of the plan period, or have planning permission.

⁶ Growth in this direction also benefits from relative proximity to Cranleigh (c. 2-3km to the west).

⁷ See para 046 at: <http://planningguidance.communities.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/sustainability-appraisal-requirements-for-neighbourhood-plans/>

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

Appendix 2 Responses from statutory bodies

creating a better place



Ms Jennie Falconer - Policy and
Information Officer
Waverley Borough Council
Planning Policy
The Burys
Godalming
Surrey
GU7 1HR

Our ref: WA/2011/111090/OR-
19/IS1-L01
Your ref:
Date: 13 September 2016

Dear Ms Falconer

Ewhurst and Ellen's Green Neighbourhood Plan – Screening opinion for Strategic Environmental Assessment

Thank you for consulting the Environment Agency regarding a screening opinion for the Ewhurst and Ellen's Green Neighbourhood Plan Strategic Environmental Assessment. The Environment Agency is a statutory consultee in the SEA process and we aim to reduce flood risk and protect and enhance the water environment. We understand that the Neighbourhood Plan will seek to allocate sites for around 50 homes before 2032, but that those sites have not yet been identified.

We have identified that the neighbourhood plan area will be affected by the following environmental constraints, and as described below we think that there are potential significant environmental effects that relate to the Neighbourhood Plan area:

Flood risk

There are areas of flood zone 2 and 3 within the neighbourhood plan area. As noted above, we understand that the plan intends to allocate sites for around 50 homes, but those sites have not yet been identified. If any of those housing sites are within areas at risk of flooding there is a potential for significant environmental effects.

Main river

The Cranleigh Waters runs through the neighbourhood plan area. The Cranleigh Waters is currently failing to reach good ecological status/potential under the Water Framework Directive. It is currently classified as having moderate status. Developments within or adjacent to this watercourse should not cause further deterioration and should seek to improve the water quality based on the recommendations of the Thames River Basin Management Plan. An assessment of the potential impacts of the neighbourhood plan on this watercourse under WFD should be included within the SEA/SA appraisal.

For your information we have published joint advice with Natural England, English Heritage and the Forestry Commission on neighbourhood planning which sets out sources of environmental information and ideas on incorporating the environment into plans.

Cont/d..



This is available at:

http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/LIT_6524_7da381.pdf

Yours sincerely

Judith Johnson
Sustainable Places team

Direct dial 02030 259 495

Direct e-mail planning-wallington@environment-agency.gov.uk

Date: 10 October 2016
Our ref: 195099
Your ref: Neighbourhood Plan



Jennie Falconer
Waverley Borough Council
planconsult@waverley.gov.uk

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

T 0300 060 3900

BY EMAIL ONLY

Dear Jennie,

Neighbourhood Plan consultation: Ewhurst Neighbourhood Plan - draft screening opinions

Thank you for your consultation on the above dated 02 September 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 may be potential for 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 [National Planning Practice Guidance](#). 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 Ewhurst Neighbourhood Plan has 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 note that Aecom have advised that a full SEA is not required for this Neighbourhood Plan. However, we would advise that a SEA screening be conducted in order to identify or screen out any potential risks that the plan may present, alongside including relevant discussions on pertinent mitigation.



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

- Smokejack Clay Pit Site of Special Scientific Interest (SSSI)
- Somersby Wood Site of Special Scientific Interest (SSSI)
- Leith 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 a screening 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 Ewhurst Neighbourhood Plan 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 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 [Wildlife and Countryside link](#). Natural England's advice on protected species can be accessed [here](#).

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'.

Ancient Woodland – addition to the S41 NERC Act paragraph

The S41 list includes six priority woodland habitats, which will often be ancient woodland, with all ancient semi-natural woodland in the South East falling into one or more of the six types.

Information about ancient woodland can be found in Natural England's standing advice http://www.naturalengland.org.uk/images/standing-advice-ancient-woodland_tcm6-32633.pdf.

Ancient woodland is an irreplaceable resource of great importance for its wildlife, its history and the contribution it makes to our diverse landscapes.

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 only please contact Sophie Temple on 020 8026 8136. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

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

Dear Jennie

Thank you for inviting Historic England to comment on the draft Screening statement for SEA of the The Ewhurst and Ellen's Green Neighbourhood Plan.

We note that Aecom in their analysis identify the conservation areas at Ewhurst and Ewhurst Green as particularly sensitive areas. They note that the plan is likely to allocate one or all of three sites for housing for up to 50 units but that impacts to heritage assets (both designated and non-designate is likely to be limited to effects on the setting of a grade II listed Farmhouse. They conclude that this is unlikely to be a significant effect. It is not clear from the analysis whether the screening report has taken effects on non-designated heritage assets into account. Based on the relatively limited information presented we would agree with the outcome of the screening process but would express some reservation concerning how little information is presented including the locations of the sites considered as suitable for allocation and the scope of assessment of potential for impacts on, for example, archaeological remains or previously unidentified heritage assets. Neighbourhood plans are also not constrained to allocate sites only assessed through the SHLAA, whilst other policies, such as alteration or imposition of settlement boundaries can have impacts on heritage assets by constraining or promoting development in certain locations. As such we would request that this screening opinion is maintained under review as the plan emerges and reserve the right to amend our view as the draft plan emerges.

Please don't hesitate to contact me if you have any queries relating to our comment for if you require any further information

Yours faithfully

Robert Lloyd-Sweet

Historic Places Adviser (South East England) Historic England Guildford Tel. 01483 252028

Appendix 3 Further email from consultants regarding housing uplift.

From: Fessey, Mark <mark.fessey@aeacom.com> Sent: Mon 19/03/2018 09:40
To: Gayle Wootton
Cc:
Subject: RE: Ewhurst and Ellen's Green Neighbourhood Plan - draft screening opinions

Hi Gayle

Those consultation responses all manage to miss the point of the SEA screening to some extent, most notably the Natural England response!

But that's all rather beside the point now. This shift in the terms of reference for the plan (100 homes, rather than 50, and with 60 homes left uncommitted) is significant, and quite clearly means that the plan should be screened-in as requiring SEA. This is despite the Council having concluded – in light of SA work – that Ewhurst can sustainably deliver 100 homes.

The plan should be screened-in as requiring SEA... full stop. There is no need to worry at this stage about which elements of the plan need to be a particular focus of attention/assessment. That is a concern for the SEA process proper.

My suggestion is that you speak to the group and explain that the need to allocate for 60 homes gives rise to a need for SEA (in light of the PPG guidance). Also explain that they will qualify for the free "SEA Technical Support" package, such that they will have the SEA completed for them for free (by AECOM, as it happens). If the group is in agreement that SEA is required, then you can bypass further screening work / a further screening consultation, and simply commence with the SEA.

Happy to discuss further.

Regards

Mark