

# Strategic Environmental Assessment (SEA) for the Elstead and Weyburn Neighbourhood Plan

Environmental Report Update

March 2021

## Quality information

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## Revision History

| Revision | Revision date | Details                   | Name            | Position                           |
|----------|---------------|---------------------------|-----------------|------------------------------------|
| V1       | March 2021    | Draft for internal review | Cheryl Beattie  | Principal Environmental<br>Planner |
| V2       | March 2021    | Draft for QB review       | Juliet Williams | Clerk – Elstead PC                 |

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# Non-Technical Summary

## Background

AECOM is commissioned to lead on Strategic Environmental Assessment (SEA) in support of the emerging Elstead and Weyburn Neighbourhood Plan (EWNP).

The EWNP is being prepared by the Elstead and Weyburn Neighbourhood Plan Steering Group, in the context of the Waverley Local Plan. Once 'made' it will have material weight when deciding on planning applications, alongside the Waverley Borough Local Plan. The Neighbourhood Plan is at an advanced stage of preparation, with consultation completed on a 'pre-submission' version of the Neighbourhood Plan back in 2020. Following Regulation 14 Consultation, new site options were submitted for consideration which have resulted in proposed amendments to the preferred site allocations. The updated preferred site allocations are the subject of a focused consultation, for which this Environmental Report Update has been prepared.

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 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 is the scope of the SEA?

The scope of the SEA is reflected in a list of topics and objectives, which, taken together indicate the parameters of the SEA and provide a methodological 'framework' for assessment.

### *The SEA framework*

| SEA topic                      | SEA objective(s)  |
|--------------------------------|---|
| 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<br>Support the resilience of the Neighbourhood Plan area to the potential effects of climate change, including flooding |
| Landscape                      | Protect, maintain and enhance the cultural heritage resource within the Neighbourhood Plan area, including the historic environment and archaeological assets.  |
| Historic environment           | Protect and enhance the character and quality of landscapes and townscapes.   |
| Land, soil and water resources | Ensure the efficient and effective use of land.<br>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.<br>Reduce deprivation and promote a more inclusive and self-contained community.<br>Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures. |
| Health                   | Improve the health and wellbeing residents within the Neighbourhood Plan area.  |
| Transportation           | Promote sustainable transport use and reduce the need to travel.  |

## 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 plan, and then publishing information on reasonable alternatives for consultation alongside the draft plan.

As such, Part 1 of this Environmental Report explains how work was undertaken to develop and assess a 'reasonable' range of alternative approaches to the allocation of land for housing, or housing growth scenarios. Ultimately the following two growth scenarios were established:

### *The reasonable growth scenarios*

| Site                         | Growth scenario 1 | Growth scenario 2 |
|------------------------------|-------------------|-------------------|
| Springfield                  | 10                | 10                |
| Four Trees                   | 16                | 16                |
| Sunray Farm                  | 40                | 20                |
| The Croft                    |                   | 16                |
| <b>Total number of homes</b> | <b>66</b>         | <b>62</b>         |

These scenarios were then subject to assessment under the SEA framework (see table above). The conclusion of the assessment was as follows:

In **conclusion**, it is apparent from the appraisal that Option 1 performs relatively well in terms of the majority of sustainability objectives; however, it does not necessarily follow that Option 1 is 'most sustainable' overall, recognising that the sustainability objectives are assigned no particular weight or degree of importance. Focused growth at Sunray Farm (Option 1), as opposed to a lower level of growth here and additional growth at the Croft (Option 2), is noted for its potential to reduce the loss of greenfield land and avoid further loss of trees and hedgerow which form BAP Priority Habitats. Furthermore, under Option 1 more new residents would be located with good access to the local centre to support walkable local journeys and a reduced level of development at Sunray Farm may undermine the viability of the proposed scheme (which includes an element of commercial space and a children's play area).

The Neighbourhood Plan Steering Group responded to the assessment as follows:

To support the walkable neighbourhood concept and maximise previously developed land, the preferred approach will be Growth scenario 1 which maximises to maximise the development potential of Sunray Farm.

## Assessment findings at this stage

The aim of Part 2 is to present appraisal findings and recommendations in relation to the current version of the EWNP. This 'part' of the report presents a focused update to the previous plan appraisal conclusions and seeks to identify the potential updated policy mitigation/ enhancement requirements in relation to the proposed site changes. The focus is centred on the proposed changes which now allocate of the Springfield site and remove the allocation of the Croft.

The following updated conclusions are identified in relation to the proposed site allocation changes:

The conclusions are anticipated to remain broadly the same, with the EWNP performing relatively well in relation to most SEA objectives. The previously identified significant and minor positive effects are still considered likely. Enhanced minor positive effects are anticipated given that a greater number of future residents would benefit from good access to the local centre (through the allocation of the Springfield site). However, the Springfield site lies adjacent to the Elstead Conservation Area, with direct road connections to Milford Road. This is likely to compound the previously identified key constraint to growth which anticipates negative effects as a result of increased vehicle use in the historic core of the settlement. Furthermore, the previous recommendations of the SEA are upheld at this stage, until a finalised 'submission' draft is assessed.

## Next steps

This Environmental Report Update accompanies the EWNP Update for focused consultation on proposed site allocation changes.

Following the focused consultation, any representations made will be considered by the Elstead and Weyburn Neighbourhood Plan Steering Group, when finalising the plan for submission.

The 'Submission' version of the plan will then be submitted to Waverley Borough Council alongside an Updated ('Submission' version) Environmental Report. The plan and supporting evidence will be published for further consultation, and then subjected to Independent Examination.

At Independent Examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the Waverley Borough Local Plan (adopted 2018).

If the subsequent Independent Examination is favourable, the EWNP will be subject to a referendum, organised by Waverley Borough Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once made, the EWNP will become part of the Development Plan for Waverley Borough, covering the defined Neighbourhood Plan Area.

# 1. Introduction

## Background

- 1.1 AECOM is commissioned to lead on Strategic Environmental Assessment (SEA) in support of the emerging Elstead and Weyburn Neighbourhood Plan (EWNP).
- 1.1 The EWNP is being prepared by the Elstead and Weyburn Neighbourhood Plan Steering Group, in the context of the Waverley Local Plan. Once 'made' it will have material weight when deciding on planning applications, alongside the Waverley Borough Local Plan.
- 1.2 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 positive effects. SEA of the EWNP is a legal requirement.<sup>1</sup>

## SEA explained

- 1.3 It is a requirement that SEA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which transposed into national law EU Directive 2001/42/EC on SEA.
- 1.4 In-line with the Regulations, a report (known as the **Environmental Report**) must be published for consultation alongside the draft plan that "*identifies, describes and evaluates*" the likely significant effects of implementing "*the plan, and reasonable alternatives*".<sup>2</sup> The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 1.5 More specifically, the Report must answer the following three questions:
  - 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**?

## This Environmental Report Update

- 1.6 This report is an Environmental Report Update for the EWNP. It is published alongside the EWNP for focused consultation on site allocation changes prior to submission.
- 1.7 This update leads on from the previous SEA Environmental Report (March 2020). Following the focused consultation, a submission version SEA Environmental Report will be prepared to accompany the submission version of the EWNP.
- 1.8 This report continues to follow the same structure as the previous report, essentially answering questions 1, 2 and 3 (above) in turn, to provide the required information. Each question is answered within a discrete 'part' of the report. However, as part of a focused consultation, the report is focused on the key changes to the proposed spatial strategy.
- 1.9 Before answering these questions, a brief overview of the context provided by the Waverley Local Plan as well as the scope of the SEA is provided.

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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 Elstead and Weyburn Neighbourhood Plan was subject to formal screening in 2017, at which time it was determined that SEA is required.

<sup>2</sup> Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations 2004.



allocates strategic sites. Work is currently underway on LPP2 which will identify non-strategic site allocations and development management policies.

1.13 Neighbourhood plans are required to be in general conformity with the strategic policies of the Local Plan. In this way it is intended for the Local Plan to provide a clear overall strategic direction for development in Waverley, whilst enabling finer detail to be determined through the neighbourhood planning process where appropriate.

1.14 There are two key policies in the Waverley LPP1:

- Policy ALH1 (The Amount and Location of Housing) of the Waverley LPP1 requires 160 homes (including homes permitted and built since April 2013) to be provided within the Elstead and Weyburn Neighbourhood Plan area.
- Policy RE2 (Green Belt) 'insets' Elstead from the Green Belt, i.e. establishes a settlement boundary within which land is not within the Green Belt, as opposed to the previous situation whereby the village was 'washed over' by the Green Belt, but also commits to detailed adjustments through LPP2 and identifies two potential broad areas - see Figure 1.2.

1.15 A 'preferred options' version of LPP2 was published for consultation in 2018, with the strategy for Elstead discussed in both Section 3 (Location of Development) and Section 4 (Housing):

- Section 3 (Location of Development) - Map 2 (reproduced below as Figure 1.3) proposed an adjusted settlement boundary in-line with the LPP1 proposal, with supporting text (para 3.7) also identifying the possibility of *"accommodating some growth requiring removal of additional land from the Green Belt on the edge of the [village]."*
- Section 4 (Housing) - proposed allocation of three sites to meet the LPP1 housing target, having taken account of housing completions and permissions granted since the start of the plan period (2013). Specifically, it proposed allocation of two sites that fall within the proposed Green Belt boundary (DS23 Land to the rear of the Croft - 35 dwellings; and DS25 Land at Four Trees, Hookley Lane - 20 dwellings) and DS24 Sunray Farm, West Hill (12 dwellings), which is a previously developed site that falls outside of the proposed Green Belt boundary. The three proposed allocations were shown in Map 8 of the LPP2 Preferred Options consultation document (2018), which is reproduced below as Figure 1.4.

1.16 Most recently, the 'pre-submission' version of LPP2 was published for consultation (under Regulation 19 of the Local Planning Regulations) in November 2020. Importantly, the latest version of LPP2 does not seek to allocate sites at Elstead, and does not discuss potential locations for growth at the village. Rather, the proposal is to leave the task of allocation to the Neighbourhood Plan. The situation is explained at paragraph 3.8 of the plan document:

*"[Chiddingfold, Elstead, Milford and Witley] have been inset from the Green Belt in Local Plan Part 1. [Chiddingfold, Elstead, Milford and Witley] will also be accommodating some growth requiring removal of additional land from the Green Belt on the edge of the villages, either through this Plan or through the relevant Neighbourhood Plan. As it stands Local Plan Part 2 will identify the Green Belt boundary changes in the parish of Witley, which includes Milford. In Chiddingfold and **Elstead**, settlement and Green Belt boundary changes to accommodate planned growth will be made through the relevant Neighbourhood Plans."*

Figure 1.2: The settlement boundary following adoption of LPP1

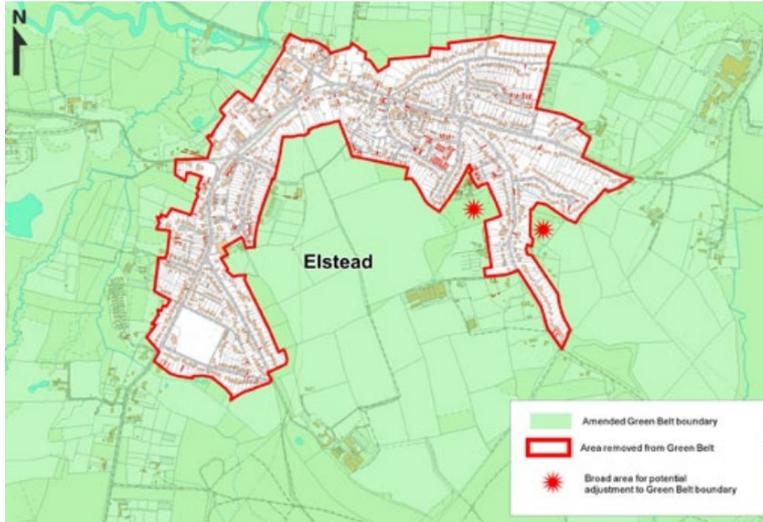


Figure 1.3: Draft LPP2 (2018) proposed settlement boundary

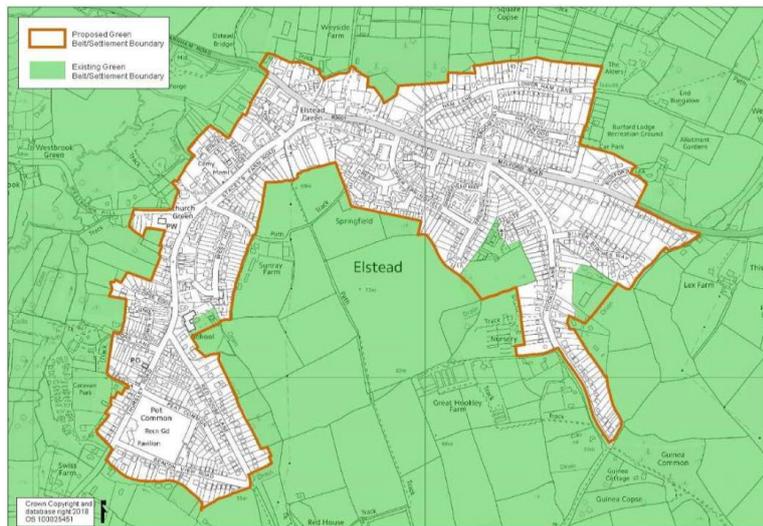
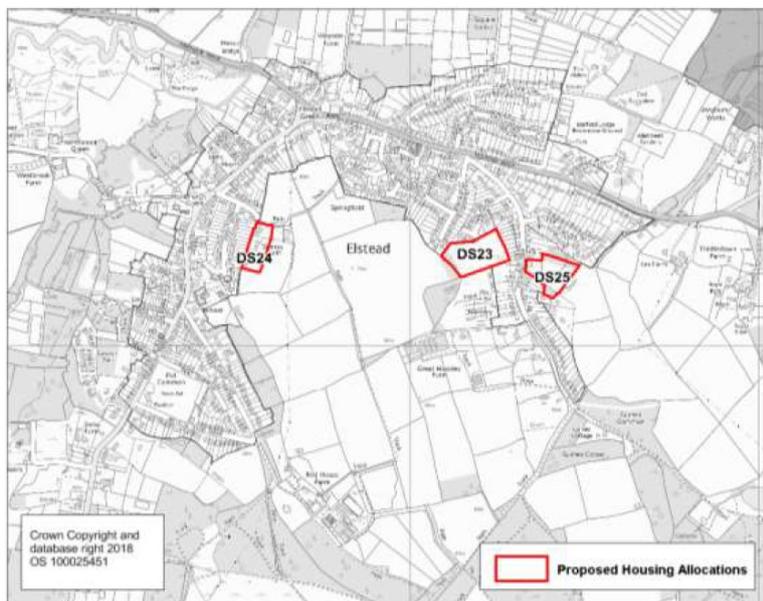


Figure 1.4: Draft LPP2 (2018) proposed allocations



## What is the scope of the SEA?

1.17 The aim here is to introduce the reader to the scope of the SEA, i.e. the sustainability topics and objectives that should be a focus of the assessment of the plan and reasonable alternatives. For detailed scoping information, please refer to the previous SEA Environmental Report (March 2020).

## Consultation

1.18 The SEA Regulations require that “when deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies”. In England, the consultation bodies are the Environment Agency, Historic England and Natural England.<sup>3</sup> As such, these authorities were consulted in 2019.<sup>4</sup>

## The SEA framework

1.19 The SEA scope is summarised in a list of topics, objectives, issues and questions, known as the SEA framework. **Table 1.1** presents a summary.

*Table 1.1: The SEA framework (summary)*

| 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<br>Support the resilience of the Neighbourhood Plan area to the potential effects of climate change, including flooding   |
| Landscape                      | Protect, maintain and enhance the cultural heritage resource within the Neighbourhood Plan area, including the historic environment and archaeological assets.  |
| Historic environment           | Protect and enhance the character and quality of landscapes and townscapes.   |
| Land, soil and water resources | Ensure the efficient and effective use of land.<br>Promote sustainable waste management solutions that encourage the reduction, re-use and recycling of waste.<br>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.<br>Reduce deprivation and promote a more inclusive and self-contained community.<br>Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures. |
| Health                         | Improve the health and wellbeing residents within the Neighbourhood Plan area.  |
| Transportation                 | Promote sustainable transport use and reduce the need to travel.  |

<sup>3</sup> These consultation bodies were selected “by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes” (SEA Directive, Article 6(3)).

<sup>4</sup> The SEA Scoping Report is available on the Neighbourhood Plan website.

**Part 1: What has plan-making/ SEA  
involved to this point?**

## 2. Introduction (to Part 1)

### Overview

- 2.1 Work on the EWNP has been underway for several years, with formal consultations held in 2018 and 2020 under Regulation 14 of the Neighbourhood Planning Regulations.
- 2.2 The aim here is not to provide a comprehensive explanation of work to date, but rather to explain work undertaken to develop and appraise **reasonable alternatives** in 2021.
- 2.3 More specifically, this part of the report presents information on the consideration given to reasonable alternative approaches to addressing a particular issue that is of central importance to the plan, namely the allocation of land for housing, or 'growth scenarios'.

### Why focus on growth scenarios?

- 2.4 The decision was taken to develop and assess reasonable alternatives in relation to the matter of allocating land for housing, or growth scenarios, in light of the EWNP objectives (see para 2.9), and on the basis that a choice exists where there is the likelihood of being able to differentiate between the merits of alternatives in respect of 'significant effects'. National Planning Practice Guidance is clear that SEA should focus on matters likely to give rise to significant effects.

### Who's responsibility?

- 2.5 It is important to be clear that:
  - **Establishing growth scenarios** - is ultimately the responsibility of the plan-maker, although the SEA consultant (AECOM) is well placed to advise.
  - **Assessing growth scenarios** - is the responsibility of the SEA consultant.
  - **Establishing the preferred growth scenario** - is the responsibility of the plan-maker.

### Structure of this part of the report

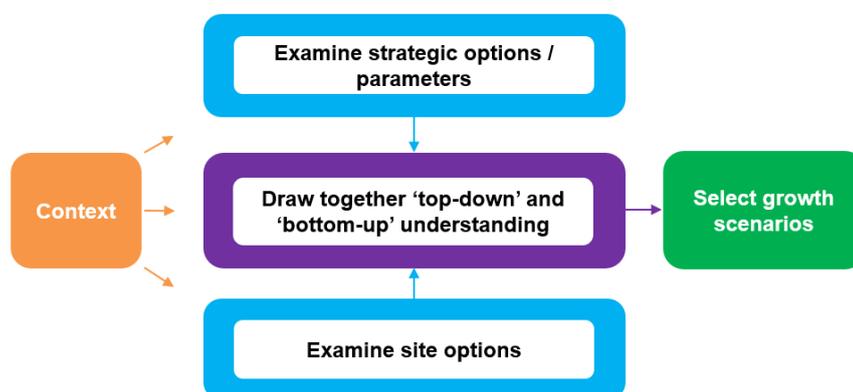
- 2.6 This part of the report is structured as follows:
  - **Chapter 5** - explains the process of establishing growth scenarios;
  - **Chapter 6** - presents the outcomes of appraising growth scenarios;
  - **Chapter 7** - explains reasons for establishing the preferred scenario, in light of the appraisal.

## 3. Establishing growth scenarios

### Introduction

- 3.1 The aim here is to explain a process that led to the establishment of growth scenarios, and thereby present “an outline of the reasons for selecting the alternatives dealt with”.<sup>5</sup>
- 3.2 Specifically, there is a need to: **1)** explain strategic options/parameters with a bearing on the establishment of growth scenarios; **2)** discuss work completed to examine site options (i.e. sites potentially in contention for allocation); and then **3)** explain how the ‘top down’ and ‘bottom up’ understanding generated were married together in order to arrive at growth scenarios.

*Figure 3.1: Establishing the growth scenarios*



### Strategic options / parameters

- 3.3 There is a need to present a discussion of ‘top down’ influences on the establishment of growth scenarios under the following headings:
- Housing growth quantum
  - Broad strategy 1: LPP1
  - Broad strategy 2: LPP2
  - Broad strategy 3: Environmental constraints
  - Broad strategy 4: Local priorities
  - Broad strategy 5: Consultation responses

#### Housing growth quantum

- 3.4 In summary, given completions (since 2013) and existing unimplemented permissions totalling 97 homes, there is a need to allocate sites to deliver 63 homes through the EWNP, in order to meet the LPP1 target of 160 homes.

#### Broad strategy 1: LPP1

- 3.5 There is a need to consider the context provided by LPP1 Policy RE2 (Green Belt), and specifically the two highlighted ‘broad locations’ for growth – see Figure 2.2, above. There is naturally a need to give close consideration to allocations within these two broad locations.

<sup>5</sup> Schedule 2(8) of the SEA Regulations.

## Broad strategy 2: LPP2

- 3.6 There is a need to consider the context provided by the Preferred Options version of LPP2 (2018), which proposed a new settlement / Green Belt boundary and three allocations (see Figures 1.3. and 1.4, above). There is naturally a need to give close consideration to this context; however, equally, there is a need to recall that the most recent ('pre-submission') version of LPP2 does not propose either a revised settlement / Green Belt boundary or sites for allocation.

## Broad strategy 3: Environmental constraints

- 3.7 There is a need to recall the major environmental sensitivities that are an inherent and significant constraint to growth at Elstead. In particular, the whole of the plan area is located within the Surrey Hills AONB, and also within the Wealden Heath Special Protection Area (SPA) 5km buffer zone (with much within the 400m SPA zone of influence).

## Broad strategy 4: Local priorities

- 3.8 There is a need to consider the more local level strategic context, as established through consultation with the local community over recent years, and through technical evidence gathering. In particular, the Elstead and Peper Harow Housing Needs Survey (2019) outlines that provision of smaller (2-3 bed) properties would help meet the aspirations of those looking to downsize from very large homes need whilst also helping to meeting the needs of newly forming household and growing families. The survey also identified that there are approximately 22 households from Elstead in need of affordable housing.

## Broad strategy 5: Consultation responses

- 3.9 The 'pre-submission' version of the Elstead Neighbourhood Plan, which was published for consultation in March 2020, proposed three allocations – see Figure 5.2. These allocations broadly aligned with those proposed by the preferred options version of LPP2 (2018), although the proposal was for the allocation at Sunray Farm to extend beyond previously developed land.
- 3.10 The March 2020 proposed strategy remains an option at the current time; however, certain issues were raised through the consultation, such that there is a need to explore alternatives.

Figure 5.2: The March 2020 Elstead Neighbourhood Plan Key Diagram

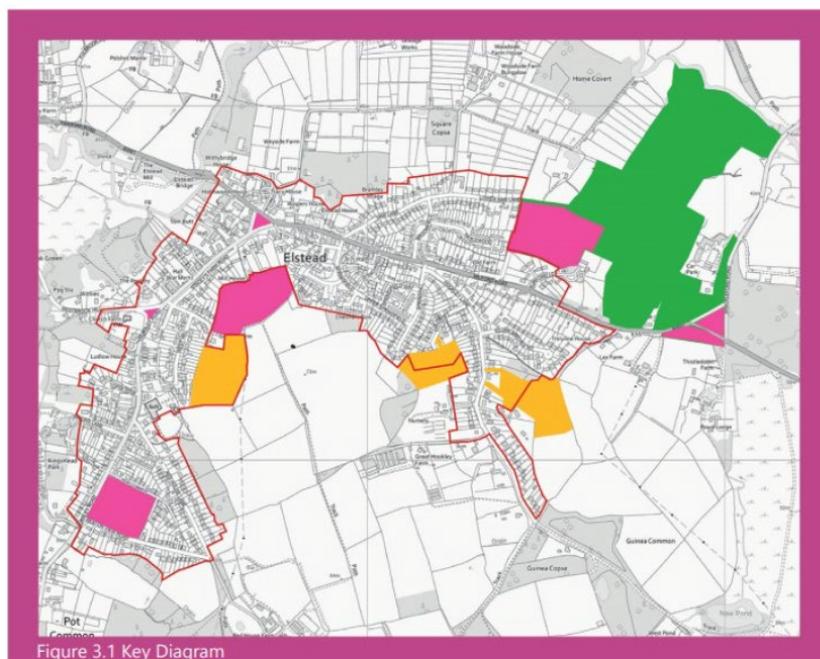


Figure 3.1 Key Diagram

- Settlement Boundary
- Tanshire and Weyburn Green Gap
- Local Green Spaces
- Housing Sites



3.12 Of these nine sites, the following five are judged to perform relatively poorly, such that they need not reasonably be taken forward to the growth scenarios:

- Site 1 - falls at the eastern extent of the settlement, outside of the settlement boundary and distant from the centre of the village and the primary school. Also, the site is located within 400m of the Wealden Heaths Phase 1 SPA.
- Sites 6 and 7 - fall at the western extent of the village, outside of the settlement boundary. These sites are well located in respect of the village centre, but would represent 'backland' development within or adjacent to the Westbrook Green Conservation, in close proximity to the grade 2\* listed church. Further constraints relate to proximity to the extensive woodland that defines the western edge of the village, parts of which comprise ancient woodland and all of which is locally designated as a Site of Importance for Nature Conservation (SINC).
- Site 12 – falls outside of the settlement area, whilst this could have been previously connected through anticipated development at the adjacent site.
- 0488 – it is understood the site is not available development within the plan period.

The remaining four sites (**Sites 2, 3, 5 and 11**) warrant progression to the growth scenarios. Taking each in turn (east to west):

- Site 2 (Land at Four Trees, Hookley Lane; 2.4 ha) – falls outside of the current settlement boundary, but within the settlement boundary that was proposed by the preferred options version of LPP2 in 2018, which proposed allocation of the site for 20 homes. Subsequent masterplanning work undertaken on behalf of the Parish Council suggested a lower capacity figure, and the pre-submission version of the Elstead Neighbourhood Plan (2020) ultimately proposed allocation for up to **11 homes**. The site is broadly supported at the current time, in light of consultation responses received.
- Site 3 (Land to the rear of the Croft; 1.5 ha) - falls outside of the current settlement boundary, but within the settlement boundary that was proposed by the preferred options version of LPP2 in 2018, which proposed allocation of the site for 35 homes. Subsequent masterplanning work undertaken on behalf of the Parish Council suggested a lower capacity figure, and the pre-submission version of the Elstead Neighbourhood Plan (2020) ultimately proposed allocation for up to **16 homes**. There are concerns regarding allocation of this site, including from an 'access' perspective, and concerns are particularly acute in respect of a larger scheme of 35 homes, such that the option of a 35 home scheme can be ruled out as unreasonable.
- Site 5 (Sunray Farm, West Hill; 2.6 ha) – falls outside of the current settlement boundary, and outside of the settlement boundary that was proposed by the preferred options version of LPP2 in 2018; however, the preferred options version of LPP2 proposed allocation of the previously developed part of the site for 12 homes. Subsequent masterplanning work undertaken on behalf of the Parish Council suggested a higher capacity figure for the previously developed part of the site, as well as the option of extending the site beyond previously developed land. The pre-submission version of the Elstead Neighbourhood Plan (2020) ultimately proposed allocation for up to **42 homes**, although the option of a more modest scheme of up to **20 homes** was examined closely through the SEA process (Section 6 of the 2020 Environmental Report).
- Site 12 (Springfield) – is a new site option, having only been submitted to the Parish Council through the pre-submission consultation in 2020. The site is previously developed and within the current settlement boundary, hence stands-out as suitable for allocation. Previously developed sites can tend to be associated with deliverability challenges, such that there is a need to consider the risk of delivery being delayed (with contingencies put in place); however, no such challenges are known to exist in respect of this site.

## Growth scenarios

3.13 Following discussions between the Parish Council and AECOM, and in light of SEA work completed in 202 and consultation responses received, it was considered appropriate to appraise two growth scenarios – see Table 5.1.

*Table 5.1: The reasonable growth scenarios*

| Site                         | Growth scenario 1 | Growth scenario 2 |
|------------------------------|-------------------|-------------------|
| Springfield                  | 10                | 10                |
| Four Trees                   | 16                | 16                |
| Sunray Farm                  | 40                | 20                |
| The Croft                    |                   | 16                |
| <b>Total number of homes</b> | <b>66</b>         | <b>62</b>         |

3.14 Key points to note are as follows:

- Springfield – can reasonably be held constant across the growth scenarios, as it is a strongly performing site (as a deliverable brownfield site subject to limited constraint), and given the desire to keep the number of growth scenarios to a minimum;
- Four Trees – whilst the 2020 growth scenarios (Section 6 of the SA Report) included two options for this site (11 homes and 20 homes), the current view (in light of consultation responses received, and SEA work from 2020) is that allocation for 11 homes can reasonably be held constant across the growth scenarios;
- Sunray Farm – as per the conclusion reached when arriving at growth scenarios in 2020 (see Section 5 of the Environmental Report), there are strong arguments in support of allocation, but there is a question-mark regarding whether to allocate the full site or just the previously developed part of the site;
- The Croft – whilst this was a proposed allocation in 2020, and both reasonable growth scenarios in 2020 assumed allocation of this site (one assumed allocation for 16 homes and the other allocation for 35 homes), the current view (in light of consultation responses received, and SEA work from 2020) is that the suitability of this site for allocation is questionable, and that any allocation would need to be for no more than 16 homes.
- Total number of homes – Scenario 2 would fall slightly short of the target figure of 63 homes, but is considered to be reasonable given flexibility around the precise number of homes to be delivered at Sunray Farm.

3.15 The appraisal of these growth scenarios is presented below.

## 4. Assessing the growth scenarios

### Introduction

4.1 The aim of this chapter is to present assessment findings in relation to the growth scenarios introduced above.

### Assessment findings

4.2 **Table 6.1** presents assessment findings in relation to the four growth scenarios.

4.3 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 on a par (i.e. it not possible to differentiate between them), and '?' is used to highlight uncertainty.

*Table 6.1: Assessment findings*

| Objective                    | Growth scenario 1   | Growth Scenario 2 |
|------------------------------|---|-------------------|
| Biodiversity                 |   | <b>2</b>          |
| Climate change               |  | <b>2</b>          |
| Landscape                    |  | <b>2</b>          |
| Historic environment         | =   | =                 |
| Land, soil & water resources |  | <b>2</b>          |
| Population & community       |  | <b>2</b>          |
| Health                       | =   | =                 |
| Transportation               | =   | =                 |

#### Discussion

The following bullet points consider the merits of the competing growth scenarios in respect of the established SEA framework. The narrative seeks to both differentiate the scenarios in relative terms and evaluate each scenario in isolation in terms of 'significant effects':

- **Biodiversity** - none of the sites in question are in *close* proximity to a site designated as being of biodiversity importance; however, the eastern-most site (Four Trees) is within c.550m 'as the crow flies' (c.900m by walking route) of the internationally important heathland (common land used by the MOD) that constrains the eastern extent of the Parish. This is considered to be a notable constraint, but not a significant constraint, in light of the findings of Habitats Regulations Assessment (HRA).

A further biodiversity consideration relates to on-site trees and other mature vegetation, with both the Croft and Four Trees being notably constrained in this respect, including adjacent areas of woodland shown by the nationally available dataset (see [www.magic.gov.uk](http://www.magic.gov.uk)) as comprising priority (also known as Biodiversity Action Plan, BAP) habitat. In contrast, Sunray Farm comprises previously developed land and pasture land, with the only onsite constraint being in the form of the mature boundary hedgerows, which would be suitably protected and potentially enhanced as part of any reasonably foreseeable development scheme. The Springfield site, whilst previously developed land, similarly contains trees and hedgerow which should be retained and enhanced where possible. In conclusion, given the combination of factors (proximity to the internationally important common land and onsite trees/vegetation) it is considered appropriate to flag a risk of significant negative effects under both options. The additional potential effects of habitat fragmentation and disturbance at the Croft under Option 2 is reflected in the ranking of options, with Option 1 performing better overall.

- **Climate change** - both climate change mitigation and adaptation are relevant considerations here. In respect of mitigation, a primary consideration is the need to minimise per capita emissions from transport by supporting a modal shift away from car dependency, i.e. by supporting a shift to 'sustainable' modes of transport (walking, cycling and public transport), albeit recognising that Elstead is a rural village where residents inevitably need to regularly travel to higher order settlements by car. In this respect there is clear merit to supporting a focus of growth at Springfield and Sunray Farm (under both options), as the sites are very well located in terms of proximity to the village centre and primary school/ GP. In contrast, the Croft and Four Trees sites are within a walkable (<800m) distance of the Spar convenience store at the northwest extent of the village, but beyond an easily walkable (>1200m) distance of the primary school. With regards to climate change adaptation a key consideration is flood risk, and in this respect Four Trees is subject to a degree of constraint, in that it intersects an area of surface water flood risk (according to the nationally available dataset);<sup>6</sup> however, this is mostly shown to be an area of 'low' risk. Springfield Road also contains an area of high surface water flood risk (affecting the Springfield site) where development could incorporate improved road drainage schemes to potentially reduce flood risk in this area. In conclusion, whilst Option 2 (through inclusion of development at the Croft and less development at Sunray Farm) is the less preferable option, it is not possible to conclude the likelihood of significant negative effects.
- **Landscape** – the two eastern-most sites, namely Four Trees and the Croft, give rise to limited landscape concerns (over-and-above concerns relating to loss of trees and mature vegetation, which has already been discussed above), and both relate well to the existing settlement form. The Springfield site is predominantly previously developed land within the settlement area, again giving rise to limited landscape concerns (over and above the loss of site-specific landscape features such as trees and hedgerow). Sunray Farm is considered for greater landscape constraints in terms of extending the settlement boundary and impacting upon the character of the Surrey Hills AONB and the openness of the Green Belt. However, two important factors are considered. Firstly, development at Sunray Farm provides the opportunity to regenerate derelict buildings (as a previously developed site in part) and improve amenity and landscape settings in areas of the site. Secondly, the site has planning permission for equestrian uses to include built development, such that the 'future baseline' for the site could well be (and, indeed, can be assumed to be) one whereby there is bulky new development that impacts on the openness of the Green Belt. It is therefore appropriate to flag uncertain effects under both Options; which both include the allocation at Sunray Farm. The Options differ by inclusion of the Croft site (or not) and whilst limited landscape concerns are noted at the Croft, the additional loss of greenfield land, trees and hedgerow under Option 2 is reflected in the ranking of the options, with Option 1 performing slightly better than Option 2.
- **Historic environment** – The Springfield site lies adjacent to the Elstead Conservation Area which covers the area to the east of the northern extent of Springfield Road. Direct road connections to Milford Road mean increased traffic through the designated conservation area is likely, and it is recognised that any development has the potential to affect the setting of the designated area, including views from the Grade II listed United Reformed Church. The settlement area adjacent to and north of the site is also an Archaeological Site and by natural extension, precaution in development at Springfield should be practiced; with appropriate archaeological investigation prior to any building or demolition works. It is therefore appropriate to flag uncertain negative effects at

<sup>6</sup> See <https://flood-warning-information.service.gov.uk/long-term-flood-risk/map>

this stage for both options (which both allocate the Springfield site) and recognise that the overall extent and significance of effects would ultimately be dependent upon the design and layout of development at the site. Whilst none of the remaining sites in question are in proximity to a listed building (Sunray Farm is c. 150m as the crow flies, but with extensive intervening built form), although all could lead to increased traffic through a designated conservation area. This might be a particular issue for Sunray Farm, where all traffic from the site would pass through the junction of West Hill and Thursley Road, which is very close to the boundary of the Westbrook Green Conservation Area; however, there is no certainty regarding the significance of any effect. In conclusion, the alternative scenarios are judged to perform broadly on a par, and uncertain effects are noted at this stage.

- **Land, soil and resources** - none of the sites in question are currently in productive agricultural use, and it is unlikely that any would be put into productive use in the future under a baseline scenario (recalling that Sunray Farm has planning permission for equestrian uses). A further consideration is the need to make best use of previously developed land; however, it is not possible to differentiate the scenarios in this respect, noting that Springfield and the previously developed parts of both Sunray Farm and Four Trees would be utilised under both scenarios. In conclusion, whilst both options are not considered likely to lead to significant effects, the additional loss of greenfield land at the Croft under Option 2 ultimately makes this option less favourable than Option 1 with regards to soil resources.
- **Population and community** - having already discussed matters relating to ease of access to community facilities above, a primary consideration here relates to meeting local housing needs. Both scenarios would deliver a broadly similar quantum of homes; however, there is a concern regarding the viability of a low growth scenario at Sunray Farm, which could feasibly translate into an argument for delivering few or nil affordable homes (also potentially an argument for less in the way of a mix of uses onsite, with a higher growth scenario expected to deliver a small area of commercial floorspace and a children's play area) and making less funding available for offsite infrastructure to support safe pedestrian movements). Specifically, the concern is that viability of the scheme might not 'stack up' under a lower growth scenario recognising the opportunity cost associated with the inability to bring forward equestrian development on the site, for which there is extant planning permission. In conclusion, it is appropriate to flag a concern regarding Scenario 2, but it is not possible to conclude a likelihood of significant negative effects. With regards to Scenario 1, it is noted that housing growth would bring with it some notable investment in community infrastructure; however, it is not possible to conclude a significant positive effect.
- **Health** - matters relating to safe pedestrian movements have already been touched-upon above, and it is not possible to highlight any further health-related considerations that enable meaningful differentiation of the scenarios. It is noted that a significant area of land would be made available as publicly accessible open space adjacent to Four Trees under all scenarios, and that all sites would have good access to the wider countryside (Sunray Farm benefits from an adjacent public footpath). In conclusion, the alternative scenarios are judged to perform broadly on a par, and significant effects are not predicted.
- **Transportation** - matters relating to ease of access to community facilities and safe pedestrian movements have already been discussed above. It is difficult to differentiate the site options in transport terms, with most of the roads in question (West Hill, Hinkley Lane) benefiting from a pedestrian footpath, and none of the key junctions giving rise to an obvious concern (safe traffic movements at junctions being a specialist matter to be examined further in detail). One point of note is that The Croft is a small residential cul-de-sac with no public footpath; however, it is not clear that development at this site would gain access only from this road. In conclusion, the alternative scenarios are judged to perform broadly on a par, and significant effects not predicted.

In **conclusion**, it is apparent from the appraisal that Option 1 performs relatively well in terms of the majority of sustainability objectives; however, it does not necessarily follow that Option 1 is 'most sustainable' overall, recognising that the sustainability objectives are assigned no particular weight or degree of importance. Focused growth at Sunray Farm (Option 1), as opposed to a lower level of growth here and additional growth at the Croft (Option 2), is noted for its potential to reduce the loss of greenfield land and avoid further loss of trees and hedgerow which form BAP Priority Habitats. Furthermore, under Option 1 more new residents would be located with good access to the local centre to support walkable local journeys and a reduced level of development at Sunray Farm may undermine the viability of the proposed scheme (which includes an element of commercial space and a children's play area).

## 5. Developing the preferred approach

- 5.1 This section presents the Elstead and Weyburn Neighbourhood Plan Steering Group's reasons for developing the preferred approach in light of the alternatives assessment.
- 5.2 The Steering Group have confirmed:
- 5.3 The government's planning policy and guidance, contained in the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG) stipulates that before releasing land from the Green Belt all reasonable options to make as much use as possible of suitable brownfield sites and underutilised land should have been fully examined.
- 5.4 At the time the May 2020 draft Neighbourhood Plan was prepared, to meet the LPP1 requirement there was very limited capacity within the existing settlement boundary area to deliver the additional housing required. In view of this, the Steering Group proposed to release three Green Belt sites to deliver the remaining housing quota. These sites were Sunray Farm (42 dwellings), 4 Trees (11 dwellings) and Croft 2 (10 dwellings).
- 5.5 In September 2020, Waverley Borough Council put forward the Springfield site which lies within the existing settlement area and is also a previously developed site. It would provide a net additional 16 dwellings, all of which would be available as affordable rented properties. In accordance with national planning policy Springfield is a more preferable appropriate option than any of the three Green Belt sites included in the previous draft Neighbourhood Plan.
- 5.6 The Steering Group has therefore reconsidered the suitability and numbers of dwellings at Sunray Farm, 4 Trees and Croft 2. It remains of the view that Sunray Farm is the most appropriate of the three locations, principally in view of its proximity to services, its status as previously developed land and its lesser impact on the landscape. It recommends however that the number of dwellings at Sunray should be reduced from 42 to 40, with a modest increase in the land available for business use.
- 5.7 The group also considered that 4 Trees (11 dwellings) should be retained as a site in order to provide a number of dwellings slightly above the minimum required under the terms of LPP1. Springfield (16), Sunray (40) and 4 Trees (11) would together provide space for 67 additional homes, as against the 62 still outstanding to meet the LPP1 requirement. The buffer of 5 homes has been included to ensure that the target can be met.
- 5.8 The Steering Group now considers that Croft 2 should be omitted from the Neighbourhood Plan as this site has recently been the subject of a planning application for 34 new dwellings, which has been refused by the planning authority. This location is the furthest of the three sites from the main village services and its development would involve the loss of more tree cover than either of the other two Green Belt sites. The Steering Group acknowledges that Surrey County Council Highway Department have previously indicated that a satisfactory vehicular access could be provided. However, the Steering Group remains concerned over the extent to which an appropriately safe vehicular access can be provided. It is principally for these reasons that the site is deemed to be less appropriate than either Sunray or 4 Trees.
- 5.9 The independent assessments of the other two Green Belt sites submitted in response to the May 2020 Neighbourhood Plan consultation (Land at the Rear of Water Meadow Place and Kingsmead Park) indicate that neither is a more appropriate site than either Sunray Farm or 4 Trees. The first of these is a more remote site which is not contiguous with the settlement area. It is very close to the nearby Wealden Heaths Special Protection Area (SPA); indeed, part of the site is within the SPA's 400m buffer zone. Its development would also compromise the integrity of the proposed 'green gap' which separates Elstead village and the Water Meadow Place/Tanshire developments, and Peper Harow Parish, this is included as one of the key policies in the draft Neighbourhood Plan (Policy ESDQ7). The second site (Kingsmead Park) is partly within the 400m SPA buffer zone and is located wholly within a Site of Nature Conservation Importance.

**Part 2: What are the SEA findings at this stage?**

## 6. SEA findings at this stage (Part 2)

### Overview

- 6.1 The aim of Part 2 is to present appraisal findings and recommendations in relation to the current version of the EWNP. This 'part' of the report presents a focused update to the previous plan appraisal conclusions and seeks to identify the potential updated policy mitigation/ enhancement requirements in relation to the proposed site changes. The focus is centred on the proposed changes which now allocate of the Springfield site and remove the allocation of the Croft. The previous conclusions are presented before the changes are explored and an updated conclusion is provided.

### Previous conclusions (2020)

- 6.2 The 2020 overall conclusions for the SEA of the Regulation 14 draft EWNP are presented below:
- 6.3 *“Overall in recognition of the strategic parameters of the adopted Local Plan Part 1 (LPP1) and emerging Local Plan Part 2 (LPP2) which largely influences both the level and location of future growth in the settlement, the EWNP is considered to perform relatively well across the range of SEA themes in mitigating the potential negative effects arising and maximising the potential for positive effects.*
- 6.4 *Significant positive effects are anticipated as a result of housing growth meeting the identified needs and includes a mix of sizes and tenures. Minor positive effects likely to arise also include:*
- *Benefits to biodiversity as a result of policy directions to achieve ‘net biodiversity gain’.*
  - *Improved active travel opportunities and sustainable transport access supporting transport, communities, health and climate change mitigation themes.*
  - *Policy provisions supporting high-quality design and increased water efficiency benefiting the landscape, water, and climate change mitigation themes.*
  - *New open space and landscaping provisions at the development sites supporting landscape, biodiversity, community and health and wellbeing themes.*
- 6.5 *A key constraint to the level of growth being accommodated for in the Local Plan and EWNP is the effects of increased vehicle use in the historic core of the settlement, potentially affecting the significance of the conservation area. To address this, it is recognised that the EWNP could enhance policy provisions to include expectations for development to contribute to improved parking and movements through the historic core of the settlement.*
- 6.6 *Further recommendations are also made to enhance the draft plan as follows:*
- *The recommendations of the HRA are incorporated into the EWNP policy framework.*
  - *Further consultation with Natural England occurs regarding the potential effects of development at the site allocations on nearby SSSIs.*
  - *Extended policy provisions reiterate the need for Sustainable Drainage Systems in new development*
  - *Extended policy provisions provide additional support for appropriate small-scale renewables.”*

### Considerations in relation to the proposed changes

- 6.7 In relation to the proposed changes to site allocations, the following observations are made for each of the SEA themes:
- **Biodiversity** – whilst a brownfield site, the Springfield site does contain trees and hedgerow which contribute to biodiversity and ecological connectivity. Site specific policy mitigation can ensure that these are retained where possible and reinforce any opportunity

for net gains on-site. Previously it was noted that the Croft site has ecological connections with the adjacent woodland Priority Habitat and the removal of the allocation will ultimately avoid any negative impacts in this area.

- **Climate change** – there is an area of high surface water flood risk along Springfield Road and development at the Springfield site provides the opportunity to improve road drainage in this area (potentially reducing surface water flood risk in this area). The new site allocation policy should recognise this opportunity with appropriate development requirements.
- **Landscape** – as previously developed land in the settlement area, limited landscape constraints are identified (over and above a need to retain trees and hedgerow on site where possible as identified above).
- **Historic environment** – consideration should be given in site specific policy to the potential effects of development at Springfield on the adjacent designated Elstead Conservation Area. Development has the potential to increase traffic along Milford Road with Springfield Road directly connecting to the conservation area here. Development also has the potential to affect the setting and views to/ from the Grade II listed United Reform Church to the north of the site (outside of the conservation area). Policy should recognise that the design and layout of development at the Springfield site will be crucial to minimising the potential for long-term negative effects on the historic environment. Furthermore, most of the settlement area north of the site around Milford Road is an archaeological site. Given the close proximity, the need for early appropriate archaeological investigation on-site (prior to development or demolition) should be
- **Land, soil and water resources** – the utilisation of a brownfield site over greenfield land provides significant support for efficient land use and will result in reduced loss of greenfield land overall. Reflecting this, the updated spatial strategy is considered for its potential to reduce the extent of the previously identified minor long-term negative effects.
- **Population and community** – the site allocation changes are not anticipated to result in any significant changes to the overall number of new homes being delivering over the Plan period. However, the Springfield site is considered for its easier access to the local centre and existing services/ facilities than the previous allocation site at the Croft. Enhanced positive effects can be anticipated in this respect.
- **Health and wellbeing** – whilst so significant differences to the previous findings are anticipated in relation to health and wellbeing, it is noted that the Springfield site is located within excellent walking distance (less than 400m) of existing healthcare facilities, whereas the previous allocation site at the Croft is located further from most of the settlements provisions.
- **Transportation** – whilst no significant differences to the previous findings are anticipated in relation to transport, the Springfield site is noted for its location within the existing settlement area with good access to a good range of the settlement services and facilities and good opportunity to support local walkable journeys.

## Updated conclusions (2021)

- 6.8 The conclusions are anticipated to remain broadly the same, with the EWNP performing relatively well in relation to most SEA objectives. The previously identified significant and minor positive effects are still considered likely. Enhanced minor positive effects are anticipated given that a greater number of future residents would benefit from good access to the local centre (through the allocation of the Springfield site). However, the Springfield site lies adjacent to the Elstead Conservation Area, with direct road connections to Milford Road. This is likely to compound the previously identified key constraint to growth which anticipates negative effects as a result of increased vehicle use in the historic core of the settlement. Furthermore, the previous recommendations of the SEA are upheld at this stage, until a finalised 'submission' draft is assessed.

## **Part 3: What are the next steps?**

## 7. Next steps

7.1 This part of the report explains next steps that will be taken as part of plan-making and SEA.

### Plan finalisation

- 7.2 This Environmental Report Update accompanies the EWNP Update for focused consultation on proposed site allocation changes.
- 7.3 Following the focused consultation, any representations made will be considered by the Elstead and Weyburn Neighbourhood Plan Steering Group, when finalising the plan for submission.
- 7.4 The 'Submission' version of the plan will then be submitted to Waverley Borough Council alongside an Updated ('Submission' version) Environmental Report. The plan and supporting evidence will be published for further consultation, and then subjected to Independent Examination.
- 7.5 At Independent Examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the Waverley Borough Local Plan (adopted 2018).
- 7.6 If the subsequent Independent Examination is favourable, the EWNP will be subject to a referendum, organised by Waverley Borough Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once made, the EWNP will become part of the Development Plan for Waverley Borough, covering the defined Neighbourhood Plan Area.

