

BRAMLEY NEIGHBOURHOOD PLAN 2017 - 2032 BASIC CONDITIONS STATEMENT



BRAMLEY

Neighbourhood Plan

BASIC CONDITIONS STATEMENT

Parish and Country Planning Act 1990 (as amended) Paragraph 8(2) of Schedule
4B Statement

Borough:	Waverley
County:	Surrey
Plan Period:	2017 to 2032
Qualifying Body:	Bramley Parish Council
Version:	6
Date:	12th January 2021

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1 INTRODUCTION

1.1 As part of the formal submission of the Bramley Neighbourhood Plan for Examination, there is a requirement for the Parish Council, as the 'qualifying body' to illustrate that they have complied with a series of 'basic conditions' as set out in Paragraph 8 of Schedule 4B of the Town & Country Planning Act 1990 (as amended).

1.2 This statement has been prepared to demonstrate that the Bramley Neighbourhood Plan complies with the requirements of the basic conditions as set out in Paragraph 8(1)(a) of Schedule 4B of the Act.

1.3 This Basic Conditions Statement sets out how Bramley Parish Council has met the legal requirements and basic conditions in producing a Neighbourhood Plan for Bramley; the Bramley Neighbourhood Plan (the Plan). See figure 1 below for the area covered by this Plan.

1.4 **Basic Conditions – Compliance with Legal Requirements**

2.2.1 This Statement has been prepared by Bramley Parish Council to accompany its submission to Waverley Borough Council (WBC) of a Neighbourhood Development Plan ("the Plan") under Regulation 15 of the Neighbourhood Planning (General) Regulations 2018 ("the Regulations").

2.2.2 The Plan has been prepared by Bramley Parish Council, a qualifying body, for the Neighbourhood Area covering Bramley Parish, as designated by WBC in April 2017.

2.2.3 The policies described in the Plan relate to the development and use of land in the designated Neighbourhood Area only. The Plan period is from 2017 to 2032 and it does not contain policies relating to excluded development in accordance with the Regulations.

2.2.4 The Statement addresses each of the four 'basic conditions' required of the Regulations and explains how the Neighbourhood Plan meets the requirements of Paragraph 8 of Schedule 4B of the 1990 Town & Country Planning Act together with Paragraph 6 of Schedule 4B of the 1990 Town & Country Planning Act – Convention of Rights (Human Rights Act 1998).

2.2.5 The Regulations state that a Neighbourhood Plan will be considered to have met the basic conditions if:

- having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the neighbourhood development plan;
- the making of the neighbourhood development plan contributes to the achievement of sustainable development;

- the making of the neighbourhood development plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area);
- the making of the neighbourhood development plan does not breach, and is otherwise compatible with, EU obligations;
- prescribed conditions are met in relation to the neighbourhood development plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood development plan.

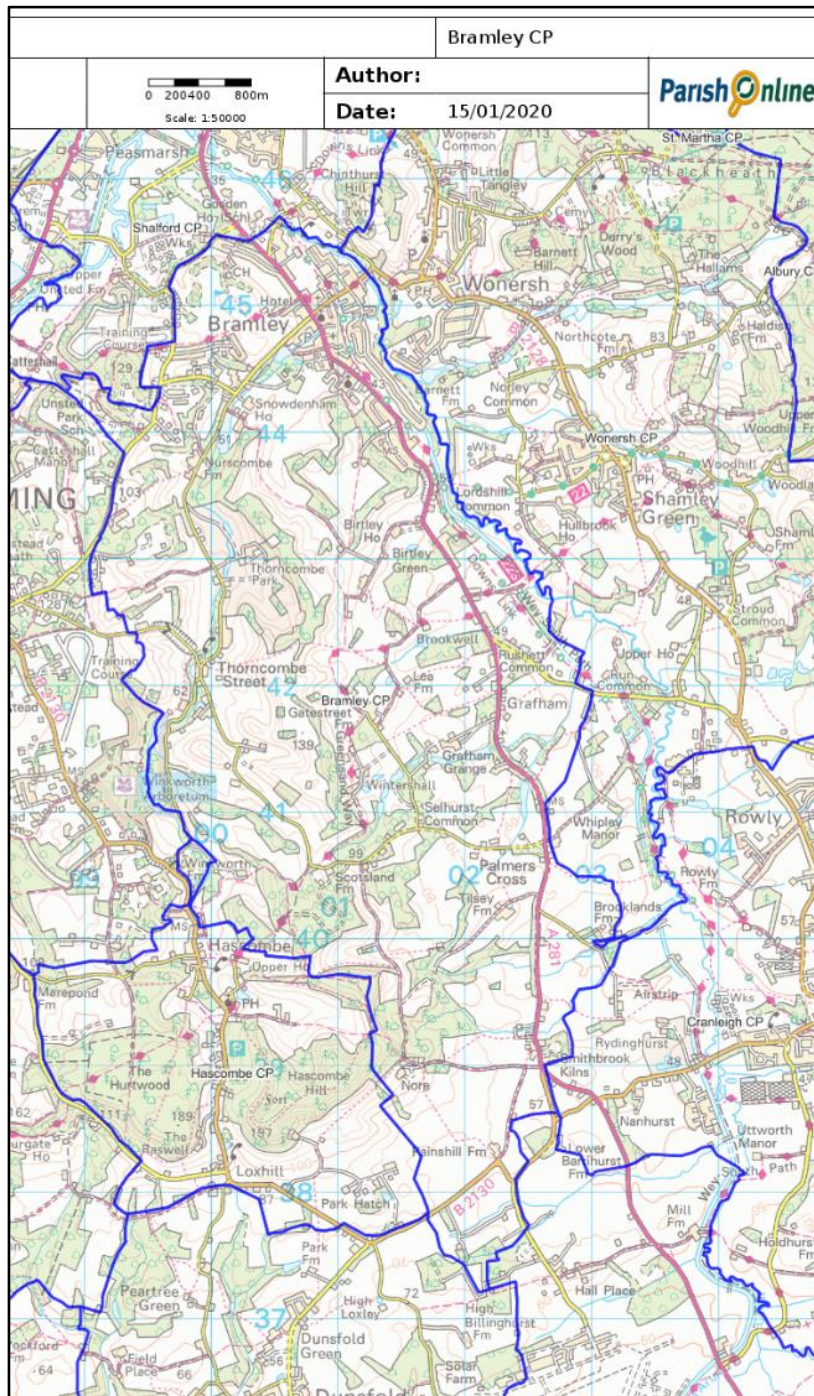


Figure 1: Bramley Neighbourhood Plan Area

2 COMMUNITY ENGAGEMENT AND CONSULTATION

2.1 Engagement and consultation with the local community on the Bramley Neighbourhood Plan is a foundational requirement to ensure the hopes, wishes and requirements of our community are considered when drafting, developing and completing the Plan. We have taken the area of consultation seriously and in construction of this Plan have invested time and effort to ensure we are in touch with our community, business organisations and **landowners**.

2.2 Community Engagement

This section defines how the community has been involved in the construction and review of the Plan.

2.2.1 In 2010, 1,247 households completed a comprehensive survey for the parish covering eleven topics including housing, traffic and infrastructure, environment and local business (the four topics in this plan), which resulted in the Bramley Parish Plan. Although 7 years old, the Parish Plan had a multi-year horizon and its findings are still relevant today and have informed this Plan. The key chart from the Parish Plan (figure 2) identified the problems and priorities. This, and the May 2017 Housing Needs Survey, provide significant questionnaire data as foundational community input.

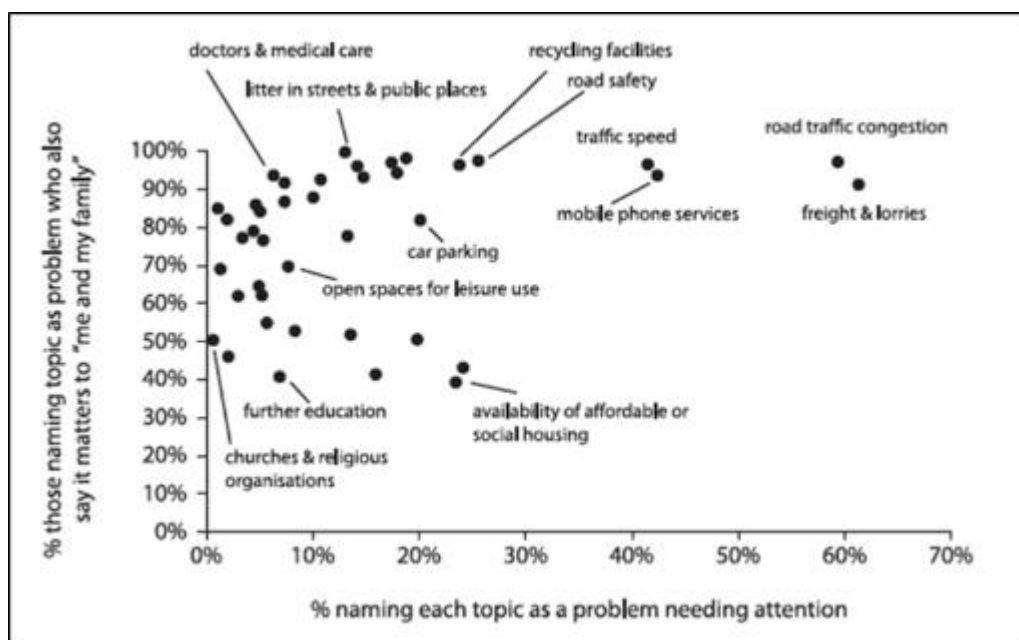


Figure 2: Bramley 2010 Parish Plan – Summary of community key issues

2.2.2 Housing Needs Survey and Report

In March and April 2017, in conjunction with this Plan, a survey of all Bramley households was undertaken by Surrey Community Action specifically on housing and development. 324 households responded, and the resulting report is critical evidence for this plan.

2.2.3 **Formation of Committee**

Residents were notified of the decision to construct the Plan through the Parish Council's monthly newsletter, Bramley Update. A small group of volunteers was formed as the Committee together with representation from the Parish Council, and support from Bramley's two Waverley Borough Councillors.

2.2.4 **Use of Bramley Update**

Bramley Update is the Parish Council's primary communication mechanism reaching 880 email addresses and over 800 of the 1,363 homes. From July 2017, a monthly update on the construction of the Plan has been provided by the Committee to residents and all recipients were offered the opportunity to review the early stage draft plan.

Following implementation of General Data Protection Regulations (GDPR), the number of email addresses has recently dropped to 508 addresses reaching 472 homes.

2.3 **Consultation**

2.3.1 **Meetings with Businesses and Organisations**

Representatives from the Committee discussed input to the Plan from major employers and organisations from May 2017 including:

- The Surrey Hills AONB
- The Surrey Hills Enterprises
- Birtley Courtyard
- Smithbrook Kilns
- Bramley Business Park
- St Catherine's School
- Bramley Infant and Nursery School
- Wey and Arun Canal Trust
- Landowners for potential allocated sites, both accepted and rejected sites.

Additional businesses and organisations were consulted with as part of the Regulation 14 basic consultation period which took place in early 2019.

2.3.2 **Initial Consultations**

The initial draft Plan (version 1.0) was placed on the Bramley Parish Council website and a Special Bramley Update was sent to all 872 email addresses

on the distribution list seeking comments. A dedicated consultation email address was created to receive input.

2.3.3 Drop-in Session 1

An initial drop-in session with local councillors and the neighbourhood plan committee for all residents was held on 15th July 2017 in Bramley Community Library. This was publicised on noticeboards and through Bramley Update and attended by approximately 60 residents.

2.3.4 Flyer to all households and business owners

To ensure all households, businesses and residents in Bramley parish had the opportunity to comment, a two-page summary of the key points of the report was distributed to every household alongside the annual Bonfire event publicity. This also publicised the next drop-in session, taking place in October 2017.

2.3.5 Drop-in Session 2

A second drop-in session with local councillors and the neighbourhood plan committee for all residents was held on 21st October 2017 in Bramley Village Hall. This was attended by 41 residents, and their primary concern was with the preferred proposed route of the Wey & Arun Canal Trust along the Downs Link through Bramley.

2.3.6 Downs Link Use Questionnaire

In response to the concerns expressed by residents over the possible use of the Downs Link through the centre of Bramley by the Wey & Arun Canal Trust for a stretch of the restored canal, Bramley Parish Council requested the views on potential uses of the Downs Link of all households in the Parish by issuing a questionnaire both in paper format and available on-line.

2.3.7 Prior to submission

For examination this plan will undergo two statutory six-week public consultations, firstly by Bramley Parish Council and subsequently by Waverley Borough Council.

2.3.8 Statutory consultation

Compliance with the regulatory statutory consultation requirements will be covered comprehensively in a separate consultation statement.

As part of the process of finalising the Plan, a statutory consultation period ran from 12th January to 22nd February 2019.

To enable feedback and questions to be received, several interactive and traditional methods were used:

- Open drop-in sessions led by the Neighbourhood Plan Steering Group and Council members.
- Bramley Parish Council web site
- Hard copies of the Plan were posted with feedback forms in Bramley Library, the Parish Council office, the Jolly Farmer and the Wheatsheaf public houses, The Nest coffee shop, Bramley Cafe and Bricks restaurant at Smithbrook Kilns.
- Posters, notice boards and mail drops were also utilised.

All comments have been collected, collated and reviewed. Prior to our submission to WBC they were thoroughly considered as input into the final draft Plan.

For completeness, during this statutory consultation period residents, landowners and business operating within Bramley were invited to open sessions – see below table.

Date	Location	Times
Saturday 19th January 2019	Bramley Village Hall	3:00pm to 5:00pm
Tuesday 22nd January 2019	Bramley Library	6:00pm to 8:00pm
Wednesday 30th January 2019	Bramley Library	10:00am to 1:00pm
Saturday 9th February 2019	Bramley Village Hall	10:00am to 1:00pm
Wednesday 13th February 2019	Unit 62, Smithbrook Kilns	10:00am to 1:00pm
Wednesday 20th February 2019	Bramley Library	6:00pm to 8:00pm

Figure 2.1: Schedule of open sessions held during statutory consultation period.

3 NATIONAL POLICIES AND ADVICE

3.1 The National Planning Policy Framework (NPPF) 2019 provides a framework within which local people and their accountable councils can produce their own distinctive neighbourhood plans and must be taken into account in the preparation of neighbourhood plans (paragraph 2). It sets out the Government's requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so.

3.2 This section demonstrates that the Plan has regard to the elements set out in the NPPF relevant to the designated area to deliver sustainable development.

- Delivering a sufficient supply of homes.
- Building a strong, competitive economy and supporting a prosperous rural economy.
- Ensuring the vitality of Parish centres.
- Promoting healthy and safe communities.
- Promoting sustainable transport.
- Supporting high quality communications
- Achieving well designed places.
- Protecting Green Belt land
- Conserving and enhancing the natural environment.
- Conserving and enhancing the historic environment.

3.3 Delivering a Sufficient Supply of Homes

3.3.1 The Plan sets the following housing objectives:

- To provide sufficient housing to meet the assessed housing need of the local community in terms of number, type, tenure and mix of housing.
- To ensure that the location and size of housing meets local needs and fits with Bramley's environmental and infrastructure policies.
- To ensure the development of brownfield or greenfield sites does not negatively impact the Green Belt or AONB and are well integrated with the adjoining countryside following Plan Policy BNP-G3. Retaining and enhancing landscape features (such as woodland, hedgerows, mature trees, watercourses and ponds) and providing a good standard of amenity space and sensitive landscape edges, vistas and protecting Heritage Assets, retaining the character of the Village and its historic features.

- 3.3.2 The Neighbourhood Plan sets out the following policies that aim to provide housing through a wide choice and mix of well-designed and high-quality homes:
- Policy BNP G1 – Spatial Plan for Bramley
 - Policy BNP G2 – Assessing suitability of sites for Development
 - Policy BNP G3 – Managing the Landscape, Heritage, Character and Design of the Parish
 - Policy BNP G4 – Extension of the Settlement Boundary
 - Policy BNP H1 – Building New Homes
 - Policy BNP H2 – Ensuring the appropriate housing mix
 - Policy BNP H3 – Ensuring appropriate specialist housing
- 3.3.3 Additional site allocations to meet the housing requirements identified in the 2017 Bramley Housing Needs Survey, refer to Chapter 10 of the Plan, Site Allocations.
- Policy BNP-S1 – Site 469d (Coleman’s Yard)
 - Policy BNP-S2 – Destination Triumph, Birtley Road site
 - Land at Smithbrook Kilns¹
- 3.3.4 The Plan makes provision for at least 90 additional homes from the start date of 1st April 2013 to 31st March 2032, in accordance with the allocation for the Parish in the Waverley Local Plan Part 1 (LPP1).
- 3.3.5 The housing supply is made up of a combination of completions since the start of the Plan period (2017-2032), existing planning consents, allocations and windfall opportunities. The Neighbourhood Plan enables the development of suitable infill development, change of use or redevelopment to housing and 2 sites that have been identified in policies BNP-S1 and BNP-S2.
- 3.3.6 The issue of affordable housing is recognised but the strategic policy requirement rests with the Waverley Local Plan.
- 3.3.7 Small scale dwellings (1 or 2 bedrooms) are sought to meet local need and to optimise the use of land.

¹ Given the complexity of the planning history for this site and the concerns raised, we consulted with WBC and the Landowner. The former had recommended that the SBK Trust should seek a Certificate of Lawfulness. WBC also provided an **informal opinion** to BPC which re-iterated that their planners could not certify that the land on the site is brownfield: “We maintain the view that the evidence does not demonstrate that the land in question is previously developed and therefore as the site lies within the Green Bel, an allocation for housing development on the site is inappropriate.” The landowner is now seeking legal advice.

- 3.3.8 Policy BNP-G3, Managing the Landscape, Heritage, Character and Design of the Parish, should ensure the quality of design of new residential development, including residential extensions.
- 3.3.9 The Plan has therefore had regard to the NPPF 2019 in setting out clear housing policies that seek to deliver an appropriate number and mix of new high quality homes.
- 3.4 **Building a Strong, Competitive Economy and Supporting a Prosperous Rural Economy**
- 3.4.1 The Plan sets the following economic objectives:
- To support a balanced local economy with a thriving village centre and support for retail and non-retail business with good access around the Parish of Bramley.
 - To retain and regenerate well-located existing business sites.
 - Support local educational establishment who are large employers in the area.
- 3.4.2 The Neighbourhood Plan sets out the following policies that aim to build a strong, competitive economy consistent with existing strengths and locally appropriate opportunities:
- Policy BNP-L1 – Supporting Retail businesses
 - Policy BNP-L2 – Supporting Non-Retail businesses
 - Policy BNP-L3 – Supporting the rural economy
 - Policy BNP-L4 – Supporting the visitor economy
 - Policy BNP-I5 – Improving Digital Connectivity
 - Policy BNP-C3 – Supporting educational facilities
- 3.4.3 These objectives and policies meet the NPPF's aims by creating a sustainable and vibrant economy; supporting the retention, intensification and regeneration of the main clusters of business activities in Bramley; supporting appropriate conversion and expansion of rural buildings for business and tourist uses within and outside the Village boundary area. Further infrastructure improvements are sought to help build a strong, competitive economy particularly in relation to transport and journeys on foot and by bicycle.
- 3.4.4 The Plan also seeks to conserve and enhance the built and natural environment which is important for the benefit of our parishioners and of the wider general public while encouraging a successful tourist industry.

3.4.5 The Plan has therefore had due regard to the NPPF 2019 in setting out clear economic objectives and policies that seek to sustain and promote the local economy.

3.5 **Ensuring the Vitality of the Village Centre**

3.5.1 The Plan sets the following economic objectives:

- To retain and enhance the attractive historic village centre as the economic and social hub of Bramley.
- To retain a range of shops within the village centre to promote a variety of retailers, including independent stores, and a thriving evening economy with a range of pubs and restaurants.
- To protect the clusters of shops and services at neighbourhood centres serving the local communities of Bramley.

3.5.2 The 4 major retail and business centres are located at Bramley High Street, Smithbrook Kilns, Birtley Courtyard and Bramley Business Centre.

3.5.3 The Neighbourhood Plan defines the Bramley village centre and sets out the following policies to ensure the vitality of this centre:

- Policy BNP-L1 – Supporting Retail businesses
- Policy BNP-L2 – Supporting Non-Retail businesses
- Policy BNP-L3 – Supporting the rural economy
- Policy BNP-L4 – Supporting the visitor economy
- Policy BNP-G3 – Managing the Landscape, Heritage, Character and Design of the Parish
- Policy BNP-C2 – Assuring future sites of community importance.

3.5.4 These objectives and policies meet the NPPF's aims by supporting and enhancing the main cluster of business activities in Bramley village centre. Further infrastructure improvements are sought particularly in relation to transport and traffic management measures.

3.5.5 The Plan also seeks to ensure high quality design within the Bramley Conservation Area and its setting (Policy BNP-G3).

3.5.6 The Plan has therefore had regard to the NPPF 2019 in setting out clear objectives and policies that seek to ensure the vitality of Bramley parish and village centre.

3.6 **Promoting Healthy and Safe Communities**

3.6.1 The NPPF provides the policy context in relation to three key types of community facility:

- buildings which provide **cultural attractions** or
- **facilities including community halls, schools, libraries and**
- **open spaces.**

3.6.2 Schools

The Plan sets objective in relation to schools to support local education establishments to ensure they stay current, viable and remain a resource for the village.

- Policy BNP-C3 – Supporting educational facilities
- Policy BNP-C4 – Supporting Bramley Infant and Nursery School

3.6.3 Open spaces

The Plan sets the following objectives in relation to open spaces:

- To protect and enhance public open spaces used for recreational purposes throughout the area, including links between open spaces and leisure activities, and ensure new provision in association with new development.

3.6.3.1 The Plan identifies specific needs for provision of open spaces and the following policies seek the retention and provision of open spaces (including setting standards for the provision of open spaces in association with residential development):

- Policy BNP-C1 – Creation and preservation of shared spaces for community use
- Policy BNP-C2 – Assuring future sites of community importance
- Policy BNP-E1 – Designation and protection of Local Green Spaces
- Policy BNP-I6 – Use of the Downs Link through Bramley village
- Policy BNP-I4 – Encouraging journeys on foot and bicycle via retention or enhancement of the existing local footpath and cycle network and where possible extending the network through sites as a way of promoting healthy communities.

3.6.4 The Plan has therefore had regard to the NPPF 2019 in setting out clear objectives and policies that seek to promote a healthy local community.

3.7 Promoting Sustainable Transport

3.7.1 The Plan sets the following transport objectives:

- To ensure sufficient infrastructure capacity is provided in a timely manner, appropriate to the scale of new development.

- To ensure new development is well connected to the facilities of Bramley by a range of transport modes, including walking, cycling and public transport and, where appropriate, makes suitable provision towards new sustainable transport infrastructure.
- To improve air quality within the village centre.
- To ensure Bramley's extensive network of footpaths, bridleways and cycle ways is protected and where possible extended through new development to continue to provide access to local facilities and the countryside.

3.7.2 The Neighbourhood Plan sets out the following policies that aim to promote sustainable transport:

- Policy BNP-I1 – Road traffic and Pedestrian safety management
- Policy BNP-I2 – Provision of Parking for Cars and Commercial vehicles
- Policy BNP-I3 – Management of the impacts of Traffic on air quality
- Policy BNP-I4 – Encouraging journeys on foot and bicycle
- Policy BNP-I6 – Use of the Downs Link through Bramley Village

3.7.3 These objectives and policies meet the NPPF's aims by enabling development proposals which would ensure sustainable transport links are provided to the principal Parish facilities or provision of, or a contribution towards, appropriate transport measures which assist walking, cycling, public transport and other highway improvements.

3.7.4 In selecting housing sites to be allocated in the Neighbourhood Plan, walking distance to the Bramley village centre or transport links and bus stops was assessed.

3.7.5 The Neighbourhood Plan has identified infrastructure requirements needed to support new development. These include:

- Traffic management measures which create an enhanced pedestrian environment and improved air quality within the village centre.
- Sustainable transport measures which assist walking, cycling and public transport including improved, sympathetically designed signage to link up the network of footpaths and other green spaces.
- Road and junction improvements to ease congestion and traffic management measures.

3.7.6 The Plan has therefore had regard to the NPPF in setting out clear transport objectives and policies that seek to promote sustainable transport options.

3.8 **Supporting High Quality Communication**

3.8.1 The Plan sets policy **BNP-15 – Improving Digital Connectivity** to improve and provide high quality communications infrastructure. Applications to build mobile phone masts that improve wireless / mobile communications within the Parish will be supported subject to:

- the applicant having demonstrated that they have exhausted mast sharing opportunities or that mast sharing is not practical; and
- suitable landscaping and camouflaging of the masts is undertaken where possible; and
- the chosen location minimises the visual impact for as many people as possible.

3.8.2 Applications to improve wired / broadband connections within the Parish will be supported, and the Parish will support developments or house clusters or roads that seek to invest in Fibre to the Premises/Home (FTTP/H) for their area.

3.8.3 All new developments of 5 houses or more should demonstrate that they are investing to provide the best possible mobile and broadband connectivity for that site given the constraints and should invest in ensuring those premises have FTTP/H if demonstrably viable.

3.9 **Achieving Well Designed Places**

3.9.1 The NPPF 2019 attaches great importance to the design of the built environment and neighbourhood plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area. Such policies should be based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics whilst avoiding unnecessary prescription, detail or imposed architectural style or taste.

3.9.2 The Plan places a strong emphasis on design – interpreting the community's desire to ensure that new development responds to the local character of the Plan area's built and natural environment.

3.9.3 The overall vision for Bramley is to continue to thrive, meeting the changing needs of the local community by ensuring new development of high quality design fits well with, and does not erode, the character of the distinctive areas of the Parish. The Neighbourhood Plan objectives and policies collectively support this vision.

3.9.4 The Plan sets the following design objectives:

- To ensure development is well designed and considers the distinctive character and heritage of each of Bramley's Hamlets and Village areas.

- Materials. The NPPF 2019 paragraph 127 c) and d) respectively state that policies should aim to ensure:
 - Developments are sympathetic to local character and history, including the surrounding built environment and landscape setting.
 - Developments establish or maintain a strong sense of place, using the arrangements of the streets, building type and materials to create attractive, distinctive places to live, work and visit.
- To protect the identity and distinctive character of the different areas of Bramley and prevent coalescence of Bramley with neighbouring Parishes, e.g. Shalford, Wonersh, Godalming, Cranleigh or Guildford.

3.9.5 The Plan describes some of the distinctive characteristics of the different character areas within the Parish and includes reference to the Bramley Design Statement which will, in due course, identify in more detail the distinctive character of different areas. The Plan seeks to promote and reinforce local distinctiveness.

3.9.6 The policies that seek to secure good design are:

3.9.6.1 Policy BNP-G3 – Managing the Landscape, Heritage, Character and Design of the Parish. The Neighbourhood Plan expects new development to be designed to a high quality which responds to the local heritage and distinctive character and reflects the identity of the local context of Bramley. (Please refer to Appendix 5 of the Plan which identifies commonly used building materials). BNP-G3 also sets out how development proposals must be sustainable and be tested against the following criteria:

- Protection of Strategic Views and Vistas;
- Protection of Heritage Assets, setting and features within the conservation area;
- Maintain the character of the built environment ensuring the scale and height is proportionate to their surroundings;
- Sustainable and high-quality design principles are followed to create attractive and safe developments;
- Materials that are in keeping and sympathetic to the local character and history of the area including landscaping and open spaces.

3.9.6.2 In addition to BNP-G3, policy BNP-G1 – Spatial Plan for Bramley, section 9 of the Plan Site Allocations and Policies BNP-S1 and BNP-S2 will use good planning and design practice as set out in the NPPF and Green Belt and AONB provisions to ensure the overall look and feel of the parish and its environs is sustained and improved.

3.9.6.3 The Environmental and Community policies within the Plan will also protect the overall character of the parish.

3.9.7 The Plan has therefore had regard to the NPPF 2019 and Waverley LPP1 in setting out clear design policies that seek to reinforce local distinctiveness.

3.10 **Protecting Green Belt Land**

3.10.1 Reflecting that Bramley Parish is almost entirely covered by Green Belt and Bramley village is completely washed over by Green Belt limiting development to within the Settlement Boundary, Brownfield Sites and Rural Exception Sites, this Plan steers housing development (with the presumption in favour of sustainable development):

- to within the Settlement Boundary in the village;
- to Allocated and potential Rural Exception Sites defined in this Plan, but not allocated;
- to brownfield sites across the Parish including conversions; and
- to sites that could meet the criteria of Rural Exceptions Sites as defined in policy BNP-G2.

3.10.2 The following Plan policies support protecting Green Belt land:

- BNP-G1 – Spatial Plan for Bramley;
- BNP-G2 – Assessing Suitability of Sites for Development;
- BNP-G3 – Managing the Landscape, Heritage, Character and Design of the Parish;
- BNP-E1 – Designation and Protection of Local Green Spaces;
- BNP-E2 – Creation and Preservation of Wildlife Corridors and Habitats.

3.11 **Conserving and Enhancing the Natural Environment**

3.11.1 The NPPF states that the planning system should contribute to and enhance the natural and local environment by a range of means, including:

- protecting and enhancing valued landscapes, geological conservation interests and soils;
- recognising the wider benefits of ecosystem services; and
- minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

3.11.2 The Plan sets the following objectives in relation to conserving and enhancing the natural environment:

- To protect and enhance the landscape around the Parish including the Surrey Hills AONB;

- To protect, enhance and improve connectivity between important green spaces of the whole Parish, including the strategically important Down Link bridleway and part of National Cycle route 21;
- To retain and extend the diversity of wildlife and habitats throughout the Neighbourhood Plan area.

3.11.3 The Plan has had regard to the NPPF in the allocation of development sites, which has been informed by an Environmental Base Line assessment.

3.11.4 In addition to considering the location of new development, the policies that seek to conserve and enhance the natural environment are:

- Policy BNP-E1 – Designation and protection of Local Green spaces;
- Policy BNP-E2 – Creation and preservation of Wildlife Corridors and habitats;
- Policy BNP-E3 – Lighting and Maintaining dark skies appropriately;
- Policy BNP-I4 – Encouraging journeys on foot and bicycle;
- Policy BNP-C1 – Creation and preservation of shared spaces for community use;
- Policy BNP-G3 – Managing the Landscape, Heritage, Character and Design of the Parish.

3.11.5 Policy BNP-G3 expects all development to protect and sensitively incorporate natural features such as trees, hedges and ponds. Other policies seek to protect and enhance open space, arcadian areas, biodiversity and strategic views and vistas as assessed against Waverley Local Plan policy.

3.11.6 The Plan has therefore had regard to the NPPF in setting out clear objectives and policies in relation to conserving and enhancing the natural environment.

3.12 **Conserving and Enhancing the Historic Environment**

3.12.1 The overall vision for Bramley is to continue to thrive, meeting the changing needs of the local community by ensuring new development of high quality design fits well with, and does not erode, the character of the distinctive areas of the Parish. The Neighbourhood Plan objectives and policies collectively support this vision.

3.12.2 The Plan sets the following objectives in relation to conserving and enhancing the historic environment:

- To conserve and enhance the distinctive built heritage assets of the area and their setting;
- To ensure development is well designed and takes into account the distinctive character and heritage of each of Bramley's individual areas;

- To protect the identity and distinctive character of the different areas of Bramley Parish hamlets and village centre.

3.12.3 The Neighbourhood Plan policies that seek to conserve and enhance the historic environment are:

- Policy BNP-C1 – Creation and preservation of shared spaces for community use;
- Policy BNP-C2 – Assuring future sites of community importance;
- Policy BNP-E3 – Lighting and Maintaining dark skies appropriately;
- Policy BNP-G1 – Spatial Plan for Bramley;
- Policy BNP-G2 – Assessing suitability of sites for Development;
- Policy BNP-G3 – Managing the Landscape, Heritage, Character and Design of the Parish.

3.12.4 All development is expected to be designed to a high quality which responds to the heritage and distinctive character of the area. In relation to Buildings and Structures of Character, the effect of a proposal on the significance of Buildings of Local Merit will be taken into account in order to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.

3.12.5 The Neighbourhood Plan has had careful regard to designated and non-designated heritage assets in the allocation of development sites and the policies above should have the effect of protecting and enhancing the character of conservation areas and listed buildings and their setting.

3.12.6 The Plan has therefore had regard to the NPPF in setting out clear objectives and policies in relation to conserving and enhancing the historic environment.

3.13 **Community Facilities**

3.13.1 The Plan seeks to protect the cultural attractions and community buildings of the Parish.

3.13.2 The Plan identifies the provision and needs for community facilities and the policies that seek to secure future retention and provision are:

- Policy BNP-C1 – Creation and preservation of shared spaces for community use;
- Policy BNP-C2 – Assuring future sites of community importance;
- Policy BNP-C3 – Supporting educational facilities;
- Policy BNP-C4 – Supporting Bramley Infant and Nursery School.

3.14 **National Planning Practice Guidance**

- 3.14.1 The Neighbourhood Plan has also followed updated National Planning Practice Guidance where relevant.

4 **CONTRIBUTION TO THE ACHIEVEMENT OF SUSTAINABLE DEVELOPMENT**

- 4.1 The NPPF states that a presumption in favour of sustainable development is at the heart of the NPPF and 'should be seen as a golden thread running through both plan-making and decision-taking' (paragraph 14).
- 4.2 The Plan has been subject to Sustainability Appraisal (SA), and this has helped to ensure that the principles of sustainable development have been considered throughout the plan-making process.
- 4.3 International and national bodies have set out broad principles of sustainable development. Resolution 42/187 of the United Nations General Assembly defined sustainable development as meeting the needs of the present without compromising the ability of future generations to meet their own needs.
- 4.4 The Neighbourhood Plan's vision for Bramley closely reflects this approach:
- 4.4.1 To support the organic development of Bramley to meet the objectively assessed needs of all members of its community using a planned and balanced approach, that seeks to improve the facilities and services for all residents whilst focusing on the need to improve accessibility to housing in Bramley for younger people, allowing individuals and families to live their lives in Bramley from cradle to grave.
- 4.4.2 The focus on younger people (and if possible, local younger people), is key to enabling Bramley to continue to be a sustainable and prosperous community in the longer term. Whilst seeking to achieve the above within Green Belt, AONB, Settlement Boundary and Conservation Area constraints consistent with Waverley Local Plan Part 1 and 2, in parallel the Plan seeks to improve the infrastructure (broadband, traffic management, car parking, mobile phone signal improvements) for residents and businesses enabling them to operate as part of a thriving local economy but still maintain the rural character of the Parish.
- 4.4.3 Four major policy areas have been identified which contribute to the three dimensions of sustainable development defined in the NPPF 2019:
- Housing provision for local people to 2032 (social dimension);
 - Conservation and enhancement of a sustainable environment (social and environmental dimension);
 - Community services and infrastructure to support sustainable development and promote the well-being of residents (social and economic dimension);
 - Supporting a thriving local economy (economic dimension).

Objectives of the Plan

- Create a sustainable plan that meets the needs of 'today' while planning and providing sustainable developments and amenities for future generations;
- To provide sufficient housing to meet the assessed housing need of the local community in terms of number, type, tenure and mix of housing;
- To ensure that the location and size of housing meets local needs and fit with Bramley's environmental and infrastructure policies;
- Support a thriving local economy;
- To support the sustainable growth of local businesses and employment opportunities throughout the Parish, including home working, recreational and agricultural;
- To improve the accessibility of local shops and services, particularly in the centre of the village;
- Enhance the sustainability of community services and infrastructure;
- To support enhancements of community facilities for sport, leisure, arts and recreation;
- To improve the pedestrian/cyclist connectivity within the village and across different parts of the Parish;
- To mitigate increasing traffic congestion.

5 **VISION FOR WAVERLEY IN 2032**

- 5.1 The Bramley Neighbourhood Plan is in full support of Waverley's vision.
- 5.1.1 The high-quality environment of Waverley, its distinctive character and its economic prosperity will have been maintained, whilst accommodating the growth in housing, jobs and other forms of development in the most sustainable way possible.
- 5.1.2 New development will have taken place in a way which takes account of the wide range of social, environmental and economic aspirations of the community and the needs of future generations. Most of the new development will be located in and around the main settlements of Farnham, Godalming, Haslemere and Cranleigh which have the best available access to jobs, services, housing, community facilities, leisure and recreation so as to minimise the need to travel and maximise the opportunities to travel by means other than the car.
- 5.1.3 Where needed to deliver the planned amount of new housing, new development will have taken place on the edge of the main settlements and on brownfield sites where these could be delivered in a sustainable way. This would include a new settlement of 2,600 homes at the Dunsfold Aerodrome site. Measures to improve access to public transport, and to improve and support access to facilities on foot or by cycle will have been supported.
- 5.1.4 An appropriate level of development will have taken place within Waverley's villages, having had regard to local needs and to the size, character and available services in each village and to landscape and other constraints. The target for Bramley being 90 new homes.
- 5.1.5 Working in partnership with other service providers, there will be new and improved infrastructure to support the increased population of Waverley, and, where needed, to mitigate the impact of major developments planned outside Waverley. Support will also be given, where necessary, to the retention of existing facilities and the provision of new facilities that provide for the leisure, recreation, health and cultural needs of the community.
- 5.1.6 The location, type and size of new housing will have taken account of local needs, demography, the size of settlements, transport and the level of services available in the towns and villages, taking account of the Waverley Settlement Hierarchy.
- 5.1.7 A range of sizes, types and tenures of new housing and accommodation will have been provided, taking account of the needs across the Borough as identified in the Council's Strategic Housing Market Assessment (SHMA), particularly with regard to the accommodation needs of the older population that will have increased significantly. This will include an increase in the proportion and overall stock of subsidised affordable housing, to meet the needs of those who would otherwise not be able to afford their own home.

- 5.1.8 Waverley's economy will continue to have prospered without compromising the Borough's attractive character and high quality of life. The local economy and the needs of existing and new businesses in Waverley will have been supported through the provision of high-quality infrastructure and a range of employment accommodation, including homes that are affordable for key workers. Important employment assets will have been retained and, where necessary, new development will have contributed to the diverse stock of employment premises. The emphasis will be on sustainable economic development, of the right type and in the right place to meet employment needs both within the towns and in the rural areas.
- 5.1.9 The vitality and viability of the main centres of Farnham, Godalming, Haslemere and Cranleigh will have been safeguarded in a way that takes account of their distinctive roles. This will have been achieved through carefully planned development, which meets the needs of these centres, whilst recognising the importance of preserving and enhancing their historic character. In local and village centres, shops that meet local needs will have been supported.
- 5.1.10 The rich heritage of historic buildings, features and archaeology in Waverley will have been conserved and enhanced. The attractive landscape of Waverley, which contributes to its distinctive character and includes the Surrey Hills Area of Outstanding Natural Beauty, will also have been protected and where possible enhanced.
- 5.1.11 New building will have contributed to the creation of sustainable communities, which are safe, attractive and inclusive and where the high-quality design of new development makes a positive contribution to the area in which it is located. The unique and diverse character of Waverley's towns, villages and countryside will be cherished and preserved. New development will have taken account of this diverse character and of the different roles and functions of the settlements in Waverley.
- 5.1.12 The rich biodiversity of Waverley will have been preserved and where possible enhanced. Particular regard will be had to Special Protection Areas (SPAs) and Special Areas of Conservation (SACs). Where new development could potentially have had an adverse effect on biodiversity, measures will have been taken to ensure that the impact is either avoided or mitigated and where necessary compensated for.
- 5.1.13 Waverley will have become more sustainable through measures to combat the effects of climate change and secure reductions in greenhouse gas emissions. This will have been achieved by locating most new buildings in areas that reduce the need to travel and ensuring that through their design and construction, new buildings produce lower carbon emissions.
- 5.1.14 Measures will have been taken to adapt to the effects of climate change, which will include steps to minimise the risk of flooding and reduce demand for water and support the adaptation of buildings to cope with extremes of heat and cold in an energy efficient manner.

- 5.2 The Bramley Neighbourhood Plan is consistent with this vision where it applies to the Plan area.

- 6 **GENERAL CONFORMITY WITH THE STRATEGIC POLICIES OF THE DEVELOPMENT PLAN FOR THE AREA**
- 6.1 One of the basic conditions that Neighbourhood Plans must satisfy is that they are in general conformity with the strategic policies of the adopted development plan for the local area, i.e. the high-level strategic elements in the Local Plan that are essential to delivering the overall planning and development strategy for the local area.
- 6.2 **The newly adopted Waverley Local Plan**
- 6.2.1 The Waverley Borough Council Local Plan was adopted in 2002 for the period up to 2006. It was produced under legislation which preceded the new planning system, heralded by the Planning and Compulsory Purchase Act 2004, and the Localism Act 2011. It also preceded the NPPF. The Local Plan was prepared in the context of Regional Planning Guidance for the South East (RPG9) published in March 1994 although it is consistent with the overall thrust of this revised Regional Planning Guidance for the South East (RPG9), March 2001, which preceded the South East Plan (2010).
- 6.2.2 This Local plan has now been superseded by the adoption by Waverley of its **Local Plan Part 1: Strategic Policies and Sites which was adopted by the Council on 20th February 2018. The Local Plan Part 1: Strategic Policies and Sites (LPP1) sets out the Council's spatial framework for delivering the development and change needed to realise the vision for development in Waverley Borough up to 2032.**
- 6.2.3 LPP1 replaces a number of policies from Local Plan 2002. **Some of the Local Plan 2002 policies have been retained until the adoption of Local Plan Part 2: Site Allocations and Development Management Policies.**
- 6.2.4 For completeness, the Bramley Neighbourhood Plan policies have been mapped for conformance and in support of Waverley Local Plan Part 1.
- 6.2.5 The Neighbourhood Plan Vision and Objectives accord well with the keynote policy and aims of the adopted Local Plan.
- 6.2.6 The saved strategic policies relevant to the Plan are not highlighted in the Local Plan and the following policies are assumed to represent the strategic approach to development in the adopted Local Plan.

Retained policies from WLP 2002 now part of LPP1	Adopted Policy Content	Bramley Neighbourhood Plan Policies which are in general conformity with adopted policy
<p>Policy D1 – Environmental Implications of Development</p>	<p>The Council will have regard to the environmental implications of development and will promote and encourage enhancement of the environment.</p> <p>Development will not be permitted where it would result in material detriment to the environment by virtue of:</p> <ul style="list-style-type: none"> (a) loss or damage to important environmental assets, such as buildings of historical or architectural interest, local watercourses, important archaeological sites and monuments and areas of conservation, ecological or landscape value; (b) harm to the visual character and distinctiveness of a locality, particularly in respect of the design and scale of the development and its relationship to its surroundings; (c) loss of general amenity, including material loss of natural light and privacy enjoyed by neighbours and disturbance resulting from the emission of noise, light or vibration; (d) levels of traffic which are incompatible with the local highway network or cause significant environmental harm by virtue of noise and disturbance; (e) potential pollution of air, land or water, including that arising from light pollution and from the storage and use of hazardous substances; <p>The Council will seek, as part of a development proposal, to resolve or limit environmental impacts. This may include the submission of a flood-risk / run-off assessment to determine the potential flood risk to the development, the likely effects of the development on flood risk to others, whether mitigation is necessary, and if so, whether it is likely to be effective and acceptable. The Council will also seek remedial measures to deal with</p>	<p>The following Bramley policies seek to meet the general approach outlined in the adopted policy</p> <p>BNP-G1 BNP-G2 BNP-G3 BNP-G4 BNP-E2 and E3 BNP-I3 and I4</p>

Retained policies from WLP 2002 now part of LPP1	Adopted Policy Content	Bramley Neighbourhood Plan Policies which are in general conformity with adopted policy
	existing problems such as land contamination.	
Policy BE1 – Important Green Spaces within Settlements	Within settlements, the Council will seek to retain green spaces which are important for their visual amenity, recreational or ecological value. The loss or reduction in size of such important Green Spaces will not be permitted, other than for the essential needs of suitable outdoor sport and recreation. The enhancement of such spaces will be encouraged through appropriate management schemes.	BNP-E1, BNP-C1 and BNP-C2
Policy BE6 – Low Density Residential Areas: Bramley	<p>The Council will seek to retain the character of low-density residential areas in older well-established areas by:</p> <ul style="list-style-type: none"> (a) ensuring that where an application is made for the demolition and redevelopment of an existing property, the footprint and mass is no greater than the existing property; (b) resisting further infilling of plots where it would be detrimental to the character of the area; (c) ensuring that the conversion of a house to flats does not adversely affect the exterior of the house and its setting; (d) ensuring where further development is acceptable in principle that: <ul style="list-style-type: none"> (i) trees, hedges and boundary walls are retained; (ii) adequate space is provided around boundaries in order to ensure that such further development is compatible with the character of the area. 	Policy BNP-G1, G2, G3 and G4, meet the intent of this policy.

Table 1: Mapping retained Waverley Local Plan policies to Bramley Neighbourhood Plan policies

The analysis of the adopted Local Plan policies above illustrates that the Plan is in general conformity with the strategic policies of the adopted Local Plan.

7 WAVERLEY BOROUGH LOCAL PLAN PART 1: STRATEGIC POLICIES AND SITES. APPROVED FEBRUARY 2018

- 7.1 The previous Waverley adopted Local Plan policies above were designed to be relevant up to 2006 whereas the Current Waverley Local Plan Part 1 extends to 2032. Waverley Borough Council is preparing a new Local Plan Part 2 which must be in general conformity with the NPPF.
- 7.2 The Local Plan Part 1: Strategic Policies and Sites is one of the documents that forms the Local Plan for the Borough. It sets out the strategic policies relating to the development and use of land in Waverley and development proposals for the strategic sites identified within it. The Local Plan Part 1 will guide and direct new development in the Borough for the period up to 2032.
- 7.3 The Local Plan Part 1 focuses on the local issues and priorities that matter in Waverley. It covers a range of issues, including the Council's overall strategy for where development should be located. It also tackles issues that are of particular importance locally, such as the Council's policies for delivering affordable housing in Waverley and the preservation of a healthy and attractive environment. It has an important role as a starting point for considering planning applications. It is also a delivery strategy to guide the location of new development, along with its supporting infrastructure. The Local Plan Part 1 provides the framework for other Local Plan documents which will contain more detailed policies and the identification and allocation of land for non-strategic development to support the overall vision and strategy for the area. Local Plan Part 2, which is to follow, will contain development management policies, site allocations and land designations. The scope of Local Plan Part 2 provides the potential to allocate sites of any size. Part 1 is also important in setting a framework for the development of neighbourhood plans, under the provisions of the Localism Act 2011.
- 7.4 Whilst the Local Plan Part 1 focuses on local issues, it has to comply with national planning policy. This is currently set out in the NPPF 2019, the Planning Policy for Traveller Sites and a range of Government Circulars.

8 MAPPING WAVERLEY BOROUGH LPP1 TO PLAN POLICIES

- 8.1 In order to provide some additional clarity to the neighbourhood plan-making process, the Bramley Neighbourhood Plan policies have been assessed for their general conformity with the Local Plan Part 1 policies which have relevance to Bramley. This is detailed in Table 2 below.

Waverley Borough Local Plan Part 1: Strategic Policies	Policy Content	Bramley Neighbourhood Plan Policies which are in general conformity with emerging policy
Policy SP2 – Spatial Strategy	When considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework (NPPF). It will always work proactively with applicants to find solutions so proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area. Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.	Plan policies BNP-G1, G2, G3, G4 and H1, H2 and H3 seeks to fulfil the need of this policy
Policy ALH1 – The Amount and Location of Housing	<p>The NPPF outlines that Local Plans should meet the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period. This includes:</p> <ul style="list-style-type: none"> • identifying a 5-year supply of deliverable sites (plus a buffer of 5-20%); and • identifying a supply of specific developable sites or broad locations for growth for years 6-10 and, where possible, for years 11-15. <p>The Council will make provision for at least 9,861 net additional homes in the period from 2017 to 2032 (equivalent to at least 519 dwellings a year). Each parish is allocated.</p>	<p>Bramley allocated new housing requirement is 90 houses over the life of the Plan.</p> <p>This can be met via the Plan and policies BNP-G1, G2, G3, G4 and H1, H2 and H3</p>
Policy ICS1 – Infrastructure and Community Facilities	<p>Infrastructure considered necessary to support new development must be provided either on- or off-site or by the payment of financial contributions through planning obligations and/or the Community Infrastructure Levy.</p> <p>The Council will resist the loss of key services and facilities unless an</p>	<p>The Plan and the following policies fulfil the requirement of this policy:</p> <p>BNP-C1 and C2 and BNP-I1, I2, I3, I4 and I6</p>

Waverley Borough Local Plan Part 1: Strategic Policies	Policy Content	Bramley Neighbourhood Plan Policies which are in general conformity with emerging policy
	<p>appropriate alternative is provided or, evidence presented demonstrating that the facility is no longer required and that suitable alternative uses have been considered. A developer must provide evidence that they have consulted with an appropriate range of service providers and the community, where relevant.</p> <p>The Council will support the development of new services and facilities where required and may safeguard land for infrastructure if identified through the Infrastructure Delivery Plan. Where appropriate, proposals for new infrastructure should maximise the dual use of facilities, e.g. the extended use of school sites for wider community benefit.</p> <p>The Council will work with its partners to ensure the facilities and infrastructure set out in the Infrastructure Delivery Plan are provided in a timely and sustainable manner to support the development identified in the Local Plan. Where the delivery of development depends upon key infrastructure provision such as improvements to the road network, development will be phased to ensure the timely delivery of the infrastructure necessary to serve it.</p>	
Policy AHN1 – Affordable Housing on Development Sites	<p>The Council will require a minimum provision of 30% affordable housing on all housing developments where at least one of the following applies:</p> <ul style="list-style-type: none"> • In designated rural areas developments providing a net increase of 6 dwellings or more. • In non-designated rural areas developments providing a net increase of 11 dwellings or more. • Developments that have a maximum combined gross floorspace of more than 1000 sq. m. 	<p>The issue of affordable housing is recognised within the Bramley Neighbourhood Plan and strategic housing assessment.</p> <p>The following Plan policies fulfil the requirements of this policy:</p> <p>BNP-G1, G2, G3 and G4 and BNP-H3 and H3</p> <p>Two sites have been included in the Plan:</p>

Waverley Borough Local Plan Part 1: Strategic Policies	Policy Content	Bramley Neighbourhood Plan Policies which are in general conformity with emerging policy
	<p>On developments in rural areas where the net number of dwellings is fewer than 11 units, the contribution may be in the form of a payment equivalent to the cost of providing 30% on-site provision, commuted until after the completion of the units within the development.</p> <p>Contribution may be in the form of a financial contribution equivalent to the cost of providing 40% on-site provision, commuted until after the completion of the units within the development. In all other cases, on-site provision of affordable housing will be required and only in exceptional circumstances will an alternative to on-site provision be considered.</p> <p>In all cases where on-site provision is being made, the mix of dwelling types, sizes and tenure split should reflect the type of housing identified as being required in the most up-to-date evidence of housing needs and the Strategic Housing Market Assessment, having regard also to the form and type of development appropriate for the site.</p>	<ul style="list-style-type: none"> • BNP-S1 – Site 469d (Colemans Yard) • BNP-S2 – Destination Triumph, Birtley Road Site
Policy AHN3 – Housing Types and Size	<p>The Council will require proposals for new housing to make provision for an appropriate range of different types and sizes of housing to meet the needs of the community, reflecting the most up to date evidence in the West Surrey Strategic Housing Market Assessment (SHMA). The Council will support the provision of new housing and related accommodation to meet the needs of specific groups that have been identified in the SHMA. Currently, this indicates specific needs for:</p> <ul style="list-style-type: none"> • older people (aged 65 and over) • families with children • people with disabilities. <p>The Council will require the provision of new developments to meet Building Regulations M4 (2) Category 2 standard: “Accessible and adaptable dwellings” to meet the needs of older people and those with</p>	<p>Based on evidence for Bramley in the Strategic Housing Market Assessment, policies BNP-H1, H2, H3 and G1 reflect the assessment and wishes of the parishioners for encouraging more affordable housing and housing for older people who wish to downsize.</p> <p>Two sites have been included in the Plan:</p> <ul style="list-style-type: none"> • BNP-S1 – Site 469d (Colemans Yard) • BNP-S2 – Destination Triumph, Birtley Road Site

Waverley Borough Local Plan Part 1: Strategic Policies	Policy Content	Bramley Neighbourhood Plan Policies which are in general conformity with emerging policy
	disabilities. The Council will also encourage the development of specialist housing and appropriate types of older persons' housing on suitable sites.	<ul style="list-style-type: none"> Land at Smithbrook Kilns²
Policy EE1 – New Economic Development	<p>Permitting new employment development within defined settlements that meets the criteria set out in relevant saved policies of:</p> <ul style="list-style-type: none"> a) the Waverley Borough Local Plan 2002, or b) set out in Local Plan Part 2: Site Allocations and Development Management Policies. c) Permitting the sustainable redevelopment, intensification and/or expansion of sites presently used for employment uses that meets the criteria set out in relevant saved policies of the Waverley Borough Local Plan 2002, or set out in Local Plan Part 2: Site Allocations and Development Management Policies. d) Promoting a strong rural economy through the re-use and conversion of existing buildings and well-designed buildings for economic development and promoting the development and diversification of agricultural and other land based rural businesses. e) Making provision for accommodation for visitors to the Borough, both in terms of business trips and tourism related visits. 	Policies BNP-L1, L2, L3, L4 support a strong local and rural economy.
Policy EE2 – Protecting Existing Employment Sites	The Council will permit the change of use of existing employment sites to residential and other alternative uses where it can be clearly demonstrated that there is no reasonable prospect of the site being used for employment use. Existing employment sites include sites specifically identified by saved Waverley Borough Local Plan 2002 Policies IC2 and IC3, sites identified in Local Plan Part 2: Site Allocations and	<ul style="list-style-type: none"> BNP-L1 Supporting Retail businesses BNP-L2 Supporting non-retail businesses BNP-L3 Supporting the rural economy BNP-L4 Supporting the visitor economy

² Although not an allocated site in the Plan, the Land at Smithbrook Kilns has been identified as a potential future site should the Smithbrook Kilns Trust receive legal advice that proves the land at the site is previously developed land.

Waverley Borough Local Plan Part 1: Strategic Policies	Policy Content	Bramley Neighbourhood Plan Policies which are in general conformity with emerging policy
	<p>Development Management Policies, as well as other existing employment sites within the B Use Classes.</p> <p>Where there is an identified need for new homes, the Council will normally approve applications for a change to residential use and any associated development from employment use subject to there being no strong economic reasons why such a development would be inappropriate.</p>	
Policy LRC1 – Leisure, Recreation and Cultural Facilities	<ol style="list-style-type: none"> 1. Existing open space, outdoor leisure and recreation facilities. The Council will seek to retain, enhance and increase the quantity and quality of open space, leisure and recreation facilities and to improve access to them. Development involving the loss of open space, leisure and recreation facilities, or their change of use, will be granted permission if evidence demonstrates that: <ol style="list-style-type: none"> a) the existing use is no longer required; b) no other leisure or recreation provision is required or appropriate in that area; c) alternative provision of a suitable scale and type and in a suitable location can be made; or d) the development is for alternative sports and recreation provision, the needs for which clearly outweigh the loss, and it can be demonstrated that there are no reasonable alternative sites available. 2. Existing indoor sports, leisure, recreation and cultural facilities. Development involving the loss of indoor leisure, recreation and cultural facilities, or their change of use, will be granted permission if evidence demonstrates that: <ol style="list-style-type: none"> a) the existing use is no longer required; b) no other leisure, recreation or cultural provision is required or appropriate in that area; 	<p>The Plan sets out to retain, and, where appropriate, enhance public open space through the following policies:</p> <ul style="list-style-type: none"> • BNP-E1 Designation and protection of Local Green spaces • BNP-I4 Encouraging journeys on foot and bicycle • BNP-C1 Creation and preservation of shared spaces for community use • BNP-C2 Assuring future sites of community importance • BNP-E3 Lighting and maintaining dark skies appropriately

Waverley Borough Local Plan Part 1: Strategic Policies	Policy Content	Bramley Neighbourhood Plan Policies which are in general conformity with emerging policy
	<p>c) alternative provision of a suitable scale and type and in a suitable location can be made; or</p> <p>d) the development is for alternative leisure, recreation or cultural provision, the needs for which clearly outweigh the loss, and it can be demonstrated that there are no reasonable alternative sites available.</p>	
Policy RE1 – Non-Green Belt Countryside	Within areas shown as Countryside beyond the Green Belt on the Adopted Policies Map, the intrinsic character and beauty of the countryside will be recognised and safeguarded in accordance with the NPPF.	<p>The Neighbourhood Plan Planning Strategy defines a settlement area boundary and a spatial and housing strategy with key potential locations for the minimum 90 houses required via the housing allocation.</p> <p>The following policies within the Plan fulfil these needs:</p> <ul style="list-style-type: none"> • BNP-G1 Spatial Plan for Bramley, • BNP-G2 Assessing suitability of sites for development • BNP-G3 Managing the Landscape, Heritage, Character and Design of the Parish. • BNP-G4 Extension of the Settlement Boundary
Policy RE2 – Green Belt	The Green Belt Review examined all villages in the Green Belt in Waverley, and suggested that Bramley, Wonerh and Churt should remain washed over by the Green Belt, with some minor changes proposed to the rural settlement boundaries to allow for selected infill to	<ul style="list-style-type: none"> • BNP-G1 Spatial Plan for Bramley • BNP-G2 Assessing suitability of sites for development

Waverley Borough Local Plan Part 1: Strategic Policies	Policy Content	Bramley Neighbourhood Plan Policies which are in general conformity with emerging policy
	<p>take place. The Council accepts these recommendations, and these changes will be considered in more detail in Part 2 of the Local Plan.</p> <p>The Metropolitan Green Belt as shown on the Adopted Policies Map will continue to be protected against inappropriate development in accordance with the NPPF. In accordance with national planning policy, new development will be considered to be inappropriate and will not be permitted unless very special circumstances can be demonstrated.</p> <p>Certain forms of development are considered to be appropriate in the Green Belt. Proposals will be permitted where they do not conflict with the exceptions listed in national planning policy.</p>	<ul style="list-style-type: none"> • BNP-G3 Managing the Landscape, Heritage, Character and Design of the Parish • BNP-G4 Extension of the Settlement Boundary <p>The boundary of the Green Belt is a strategic matter for the Local Plan.</p>
Policy RE3 – Landscape Character	<p>New development must respect and where appropriate, enhance the distinctive character of the landscape in which it is located.</p> <ol style="list-style-type: none"> <u>Surrey Hills Area of Outstanding Natural Beauty</u> The protection and enhancement of the character and qualities of the Surrey Hills Area of Outstanding Natural Beauty (AONB) that is of national importance will be a priority and will include the application of national planning policies together with the Surrey Hills AONB Management Plan. The setting of the AONB will be protected where development outside its boundaries harm public views from or into the AONB. <u>The Area of Great Landscape Value</u> The same principles for protecting the AONB will apply in the Area of Great Landscape Value (AGLV), which will be retained for its own sake and as a buffer to the AONB, until there is a review of the Surrey Hills AONB boundary, whilst recognising that the protection of the AGLV is commensurate with its status as a local landscape 	<p>The Plan recognises the importance of Bramley within the AONB and Green Belt and seeks to reserve these areas and stop inappropriate development by applying the NPPF and Waverley Local Plan policies. Specifically, within policy BNP-G3, which seeks to conserve and enhance the landscape and scenic beauty of the Surrey Hills Area of Outstanding Natural Beauty and its setting. While policies BNP-G1, G2 and G3 test the type and suitability of housing.</p>

Waverley Borough Local Plan Part 1: Strategic Policies	Policy Content	Bramley Neighbourhood Plan Policies which are in general conformity with emerging policy
Policy TD1 – Townscape and Design	<p>designation.</p> <p>The Council will ensure through applying the character Policy TD1: Townscape and Design, that the character and amenity of the Borough are protected by:</p> <ol style="list-style-type: none"> 1. Requiring new development to be of a high quality and inclusive design that responds to the distinctive local character of the area in which it is located. Account will be taken of design guidance adopted by the Council including design and development briefs, Conservation Area Appraisals and associated Management Plans, town and village design statements and other design policies and guidance produced within subsequent Development Plan Documents, Supplementary Planning Documents and Neighbourhood Plans. 2. Ensuring that new development is designed so that it creates safe and attractive environments that meet the needs of users and incorporate the principles of sustainable development. 3. Encouraging and supporting the preparation and adoption of local town and village design statements and Neighbourhood Plans. 4. Promoting a high-quality public realm including landscaping, works to streets and public spaces. 5. Maximising opportunities to improve the quality of life and health and well-being of current and future residents, for example the provision of: <ul style="list-style-type: none"> • private, communal and public amenity space; • appropriate internal space standards for new dwellings; • on site play-space provision (for all ages); • appropriate facilities for the storage of waste (including general refuse, garden, food and recycling). 	<p>The Spatial Planning strategy and support of the economy and local amenities fully support the vibrancy of the village shops and centre.</p> <p>The following policies set out to full fill this need:</p> <ul style="list-style-type: none"> • BNP-G3 Managing the Landscape, Heritage, Character and Design of the Parish • BNP-G2 Assessing suitability of sites for development • BNP-L1 Supporting retail businesses • BNP-L2 Supporting non-retail businesses • BNP-L3 Supporting the rural economy • BNP-L4 Supporting the visitor economy • BNP-E1 Designation and protection of Local Green spaces • BNP-C1 creation and preservation of shared spaces for community use • BNP-C2 Assuring future sites of community importance.

Waverley Borough Local Plan Part 1: Strategic Policies	Policy Content	Bramley Neighbourhood Plan Policies which are in general conformity with emerging policy
Policy HA1 – Protection of Heritage Assets	<p>The Council will ensure that the significance of the heritage assets within the Borough are conserved or enhanced to ensure the continued protection and enjoyment of the historic environment by:</p> <ol style="list-style-type: none"> 1. Safeguarding and managing Waverley’s rich and diverse heritage. This includes all heritage assets, archaeological sites and historic landscapes, designated and non-designated assets, and their setting in accordance with legislation and national policy. 2. Understanding and respecting the significance of the assets. 3. Undertaking further Conservation Area Appraisals and producing and implementing related Management Plans. 4. Facilitating and supporting the identification and review of heritage assets of local historic, architectural and archaeological significance in accordance with the Council's agreed procedures. 5. Supporting appropriate interpretation and promotion of the heritage assets throughout the Borough. 6. Targeting for improvements, those heritage assets identified at risk or vulnerable to risk. 	<p>Bramley contains 98 listed buildings and is washed over by Green Belt and part of the Surrey Hills AONB.</p> <p>The protection and enhancement of Heritage assets is therefore addressed in the Plan.</p> <p>Specifically:</p> <ul style="list-style-type: none"> • BNP-G3 Managing the Landscape, Heritage, Character and Design of the Parish • BNP-E1 Designation and protection of Local Green Spaces • BNP-C2 Assuring future sites of community importance.
Policy NE1 – Biodiversity and Geological Conservation	<p>The Council will seek to conserve and enhance biodiversity within Waverley. Development will be permitted provided that it:</p> <ol style="list-style-type: none"> a. Retains, protects and enhances features of biodiversity and geological interest and ensures appropriate management of those features. b. Ensures any adverse impacts are avoided, or if unavoidable, are appropriately mitigated. Particular regard will be had to the following hierarchy of important sites and habitats within the Borough – Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar Sites (international designations). 	<p>As part of the Plan, we have completed an Environmental Baseline assessment for our Parish and have funded a Strategic Environmental Assessment</p>
Policy NE2 –	<p>The Council will seek to protect and enhance benefits to the existing river</p>	<ul style="list-style-type: none"> • BNP-G3 Managing the Landscape, Heritage,

Waverley Borough Local Plan Part 1: Strategic Policies	Policy Content	Bramley Neighbourhood Plan Policies which are in general conformity with emerging policy
Green and Blue Infrastructure	<p>corridor and canal network, including landscaping, water quality or habitat creation. This will be partially achieved, on development sites, by retaining or creating undeveloped buffer zones to all watercourses of 8 metres for main rivers and 5 metres for ordinary watercourses. In accordance with the Water Framework Directive, development will not be permitted which will have a detrimental impact on the visual quality, water quality or ecological value of existing river corridors and canals. In addition to the measures mentioned in NE1 above, new development should make a positive contribution to biodiversity by creating or reinforcing habitat linkages between designated sites, in order to achieve a connected local and regional ecological network of wildlife corridors and green infrastructure. The Council will seek, where appropriate, to maintain and enhance existing trees, woodland and hedgerows within the Borough.</p>	<p>Character and Design of the Parish</p> <ul style="list-style-type: none"> • BNP-E1 Designation and protection of Local Green spaces • BNP-E2 Creation and preservation of Wildlife Corridors and habitats • BNP-I4 Encouraging journeys on foot and bicycle • BNP-I6 Use of Downs Link through Bramley Village • BNP-C2 Assuring future sites of community importance

Table 2: Mapping Waverley LPP1 Policies to Bramley Neighbourhood Plan Policies

- 8.2 By analysis of the Waverley Borough Local Plan Part 1: Strategic Policies and Sites, the table above illustrates that the Plan is in general conformity with the strategic policies of the approved Waverly Local Plan.

9 EU OBLIGATIONS AND SEA

- 9.1 The Neighbourhood Plan has been the subject of a Sustainability Appraisal (SA) incorporating the provisions of Strategic Environmental Assessment (SEA) required by European law.
- 9.2 An SA Scoping Report was submitted to the statutory environmental bodies (Historic England, Natural England and the Environment Agency) as well as Waverley Borough Council and neighbouring Parish Councils and was made available to local people.
- 9.3 Comments from statutory and non-statutory consultees were taken into account in adjusting the scope of the SA. A final Sustainability Appraisal report together with a non-technical summary was submitted in support of the Regulation 15 Bramley Neighbourhood Plan.
- 9.4 The Habitat Regulation Assessment (HRA) screening exercise for the Plan concluded that there are no European sites that would be significantly affected by the proposals within the Bramley area and Natural England agree that an HRA is not necessary.
- 9.5 The Plan is considered to be compatible with EU obligations.

10

CONCLUSION

10.1

The Basic Conditions as set out in Schedule 4B to the Parish and Country Planning Act 1990 are considered to be met by the Bramley Neighbourhood Plan. It is therefore respectfully suggested to the Examiner that the Bramley Neighbourhood Plan complies with Paragraph 8(1)(a) of Schedule 4B of the Act.

APPENDIX A – STRATEGIC ENVIRONMENTAL ASSESSMENT (SEA)

Please refer to this Appendix for the full copy of the Screening Statement of the need for Strategic Environmental Assessment (SEA) for the Bramley Neighbourhood Development Plan.

Summary of Conclusions found within the report.

As a result of the screening undertaken by the Council, the following determination has been reached:

- The Bramley Neighbourhood Plan (NDP) is unlikely to have significant effects on Natura 2000 sites;
- Based on the assessment presented in Tables 1 & 2, the Bramley Neighbourhood Plan (NDP) is unlikely to have a significant effect on the environment;
- The Bramley Neighbourhood Plan (NDP) does not require a Strategic Environmental Assessment.

Screening Opinion of the Need for Strategic Environmental Assessment (SEA) for the Bramley Neighbourhood Development Plan

4th January 2021

Introduction

1. Any land use plan or programme must be screened against a set of criteria in Article 3 of the European Directive 2011/42/EC (the Directive) and Regulation 5 of the associated Environmental Assessment of Plans and Programmes Regulations 2004 (the Regulations).
2. The National Planning Practice Guidance states that it is the responsibility of the Local Planning Authority to ensure that all the (neighbourhood planning) regulations have been met in order for it to progress.³ The LPA must decide whether the proposed plan is compatible with EU obligations (including those under SEA and Habitats Regulations). If an SEA is required, the environment report must accompany the submission documents (Reg 15). If an SEA is not required, a statement detailing the screening process must be submitted/this screening statement must be submitted evidencing the reasons for the determinations.
3. For Neighbourhood Development Plans or Orders (NDP or NDO), the critical consideration is whether the plan or order 'is likely to have a significant effect on the environment' according to a set of criteria from Annex II of the Directive and Schedule 1 of the Regulations.
4. If the NDP or NDO is unlikely to have a significant effect on the environment, an SEA is not required.
5. This screening opinion must be subject to consultation with Historic England, the Environment Agency and Natural England. The results of the screening process must be detailed in a Screening Statement, made available to the public.

The Screening Process

6. Using the criteria set out in Annex II of the Directive and Schedule 1 of the Regulations, a Screening Opinion determines whether a plan or programme is likely to have significant effects.
7. The extract from 'A Practical Guide to the Strategic Environmental Assessment Directive' in Appendix 1 provides a flow diagram to demonstrate the SEA screening process.

³ Paragraph: 031 Reference ID:11-031-20150209

8. Table 1 in Appendix 1 sets out the criteria from the Practical Guide, along with an assessment of the Bramley NDP against each criterion to ascertain whether an SEA is required.
9. The assessment of likely significant effects on the environment is found in table 2.
10. A third element of the screening process relates to the Habitats Directive, and associated Conservation of Habitats and Species Regulations (2010). One of the basic conditions of neighbourhood planning is whether the making of the plan is compatible with European obligations and therefore each NDP or NDO must be screened for likely significant effects on sites designated under this legislation⁴. This assessment has been undertaken by Base and can be found at Appendix 2.

The Bramley Neighbourhood Development Plan/Order

11. The Bramley NDP identifies the provision and affordability of housing, supporting the local economy, infrastructure, and protecting the environment as four key priorities. The NDP contains policies on housing, the environment, heritage and design. There are proposals to allocate sites for approximately 16 homes, 8 of which have been granted permission since the base date of the Neighbourhood Plan. The Neighbourhood Plan also supports development in the future of a further 24 homes on an additional site but does not allocated it.
12. The sites proposed for allocation in the Neighbourhood Plan have not been assessed as part of the SEA for LPP1. The overall housing requirement for Bramley has been assessed through the LPP1 SA/SEA as part of consideration of the distribution of development across the Borough.
13. There are a number of environmental features within and close to the parish including AONB, Ancient Woodland, Conservation Areas, Flood Zones 2 & 3, a Site of Nature Conservation Interest, and Listed Buildings. The allocation of housing sites has the potential to have an impact in relation to these environmental features. There are also a number of European sites which could be affected by the proposals in the Bramley NDP either on their own or in combination. A HRA Screening Opinion has been undertaken and a copy can be found at Appendix 2. The HRA concludes that an Appropriate Assessment is not required to support the Bramley Neighbourhood Plan. This is because the Bramley Neighbourhood Plan would not give rise to significant effects on European Sites either alone or in combination with other plans and/or projects. For this reason a full appropriate assessment is not required.

⁴ In accordance with Schedule 2 of the Neighbourhood Planning (General) Regulations 2012, a NDP/NDO cannot be made if the likelihood of significant effects on any European Site, either alone (or in combination with other plans and projects) cannot be ruled out. Therefore, measures may need to be incorporated into the NDP/NDO to ensure that any likely significant effects are avoided in order to secure compliance with the Regulations.

Statutory Consultees

14. Statutory Consultees views were sought on the Draft Screening Opinion and the responses received can be found at Appendix 3.

Conclusions

15. As a result of the screening undertaken by the Council, the following determination has been reached.
16. The Bramley NDP is unlikely to have significant effects on Natura 2000 sites.
17. Based on the assessment presented in Tables 1 & 2, the Bramley NDP is unlikely to have a significant effect on the environment.
18. The Bramley NDP does not require a Strategic Environmental Assessment.

Appendix 1. Detailed assessment for SEA Screening

Figure 1. Application of the SEA Directive to NDP/NDOs.

Based on 'A Practical Guide to the Strategic Environmental Assessment Directive' (DCLG) (2005)

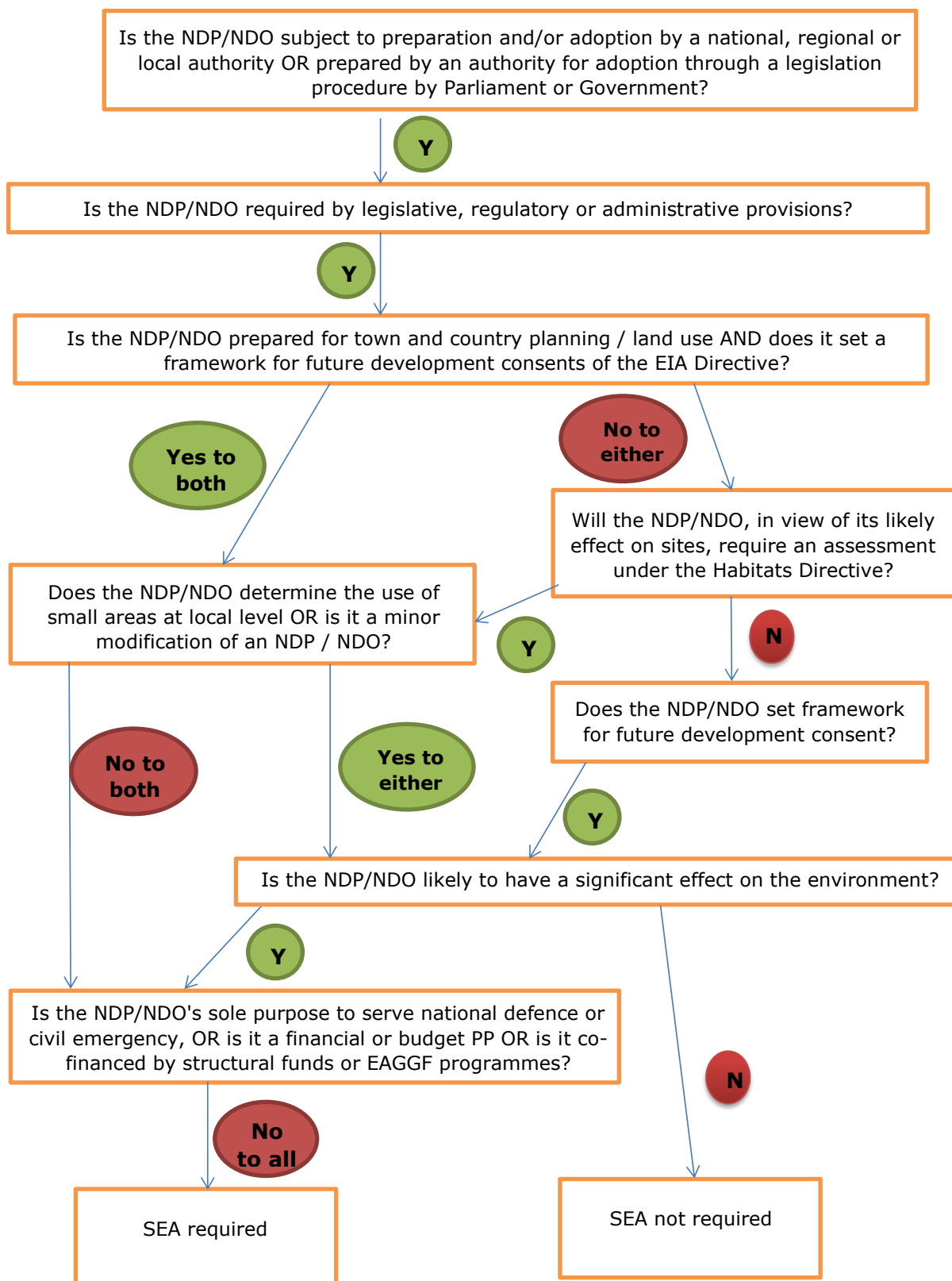


Table 1: Application of SEA Directive Screening Criteria to Bramley NDP

Stage	Y/N	Explanation
Is the NDP/NDO subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislation procedure by Parliament or Government?	Y	<p>The preparation of and adoption of a NDP or NDO is allowed under the Town and Country Planning Act 1990 as amended by the Localism Act 2011 and subject to the following regulations:</p> <ul style="list-style-type: none"> • The Neighbourhood Planning (General) Regulations 2012 • The Neighbourhood Planning (Referendums) Regulations 2012 • The Neighbourhood Planning (General) (Amendment) Regulation 2015. <p>NDPs/NDOs are prepared by a Parish Council or a Forum (as the 'relevant body') and will be 'made' by Waverley Borough Council as the local authority.</p>
Is the NDP/NDO required by legislative, regulatory or administrative provisions?	Y	<p>Whilst the NDP/NDO is not a requirement and is optional under the provisions of the Town and Country Planning Act 1990 as amended by the Localism Act 2011, it will, if 'made', form part of the Development Plan for the Borough. As such it will pass through the formal plan preparation procedures within the Council.</p>
Is the NDP/NDO prepared for town and country planning/land use AND does it set a framework for future development consents of EIA Directive?	Y	<p>The Bramley NDP is prepared for town and country planning and land use, and will set out a framework for future development in Bramley, including the development of residential uses. However, these projects are not of the scale referred to in Annex 4(2) of the EIA Directive – listed at Annex II of the Directive.</p>
Will the NDP/NDO, in view of its likely effect on sites, requires an assessment under Article 6 or 7 of the Habitats Directive?	N	<p>The Bramley NDP will not have significant effects on Natura 2000 Sites. See Habitats Regulations Assessment (HRA) Screening Opinion for the Bramley NDP in Appendix 2.</p>

Stage	Y/N	Explanation
Does the NDP/NDO determine the use of small areas at a local level OR is it a minor modification of an NDP/NDO?	Y	The Bramley NDP will allocate small sites for a total of approximately 16 dwellings for development at a local level, 8 of which have been granted permission since the base date of the NDP. The NDP also supports development in the future of a further 24 homes on an additional site but does not allocate it. The document will also include policies to guide development.
Does the NDP/NDO set framework for future development consent?	Y	When made, the Bramley NDP will include a series of policies to guide development within the settlement. These policies will inform the determination of planning applications providing a framework for future development consent of projects. However these policies are required to be in general conformity with the policies in the Local Plan, which have been subject to a SA/SEA.
Is the NDP/NDO's sole purpose to serve national defence or civil emergency, OR is it a financial or budget PP OR is it co-financed by structural funds or EAGGF programmes?	N	These conditions are not applicable to neighbourhood planning.
Is the NDP/NDO likely to have a significant effect on the environment?	N	While the NDP will allocate housing sites, this will be for a limited scale of development, in general conformity with the housing requirement assigned to the Parish in LPP1. Constraints such as the Green Belt mean that there is limited potential for additional development. The neighbourhood plan is unlikely to have significant effects on the environment. See the assessment in Table 2.

Table 2. Assessment criteria for determining the likely significance of effects on the environment

Based on Schedule 1 of the SEA Regulations (2004)

1. The characteristics of plans and programmes, having regard, in particular, to -

(a) The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;	The Bramley NDP would, if adopted, form part of the statutory Development Plan and as such does contribute to the framework for future development consent of projects. The Bramley NDP will sit within the wider framework set by the National Planning Policy Framework, the strategic policies of the Waverley Local Plan Part 1 (2032). This plan will set projects at a local scale and will have limited resource implications.
(b) The degree to which the plan or programme influences other plans and programmes including those in a hierarchy;	The Bramley NDP will have regard to national policy and be in general conformity with the strategic policies of the Borough's Local Plan. It is unlikely to influence other plans or programmes within the Statutory Development Plan.
(c) the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;	The Bramley NDP will promote sustainable development of the parish; this is one of the basic conditions of neighbourhood planning. It is likely to contain policies relating to housing, the environment, heritage, and design and by being in conformity with the Local Plan Part 1, it continues the golden thread of the presumption in favour of sustainable development.
(d) environmental problems relevant to the plan or programme; and	<p>The parish contains the following environmental designations; AONB, Ancient Woodland, Conservation Areas, Flood Zones 2&3, a Site of Nature Conservation Interest and Listed Buildings.</p> <p>As the neighbourhood plan must be in general conformity with the NPPF and LPP1, and given the level of development proposed through the NDP, the NDP will not allocate development which is likely to have a significant impact on these designations.</p>

(e) the relevance of the plan or programme for the implementation of Community legislation on the environment (for example, plans and programmes linked to waste management or water protection).	The NDP is not considered to have an adverse impact on water levels and quality in the Thames Basin Heaths, Wealden Heaths SPA and Thursley, Ash, Pirbright and Chobham SAC.
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2. Characteristics of the effects and of the area likely to be affected, having regard, in particular to:

(a) the probability, duration, frequency and reversibility of the effects;	The Bramley NDP is likely to have modest but enduring environmental effects. The effects are not likely to be reversible as they will emanate from physical developments, however they will be of a local scale. The plan seeks to ensure that effects are positive in nature.
(b) the cumulative nature of the effects;	The level of growth predicted at Bramley has been assessed by the SA/SEA of the Local Plan Part 1 and no significant effects have been identified across the Borough.
(c) the transboundary nature of the effects;	Transboundary effects are defined in the SEA Regulations (Reg. 14) as those affecting another Member states. It is not expected that any effects should arise in other Member states from the Bramley NDP.
(d) the risks to human health or the environment (for example, due to accidents);	There are no significant risks to human health or the environment from the Bramley NDP.
(e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);	The Bramley NDP relates to the parish of Bramley. The magnitude and spatial extent of the effects are likely to be local in scale.

<p>(f) the value and vulnerability of the area likely to be affected due to:</p> <ul style="list-style-type: none"> a. special natural characteristics or cultural heritage b. exceeded environmental quality standards or limit values; or c. intensive land-use; 	<p>The main vulnerability of the parish is the impact of small scale developments on the character and appearance of the Conservation Areas, setting of Listed Buildings, and the Green Belt, however given the likely scale of development and the need for the NDP to be in general conformity with the NPPF and LPP1, there are likely to be no significant effects.</p>
<p>(g) the effects on areas or landscapes which have a recognised national, Community or international protection status.</p>	<p>The main potential effect is the potential for small scale development to have an impact on the AONB, however given the likely scale of development and the need for the NDP to be in general conformity with the NPPF and LPP1, there are likely to be no significant effects.</p>

Appendix 2: HRA Screening Opinion

Bramley Neighbourhood Plan

Habitats Regulations Assessment (HRA)

Screening Statement – Determination under Regulation 105 & 106 of the
Conservation of Habitats and Species Regulations 2017

August 2020

Prepared by

base | TOWN PLANNING
URBAN DESIGN
ENVIRONMENT

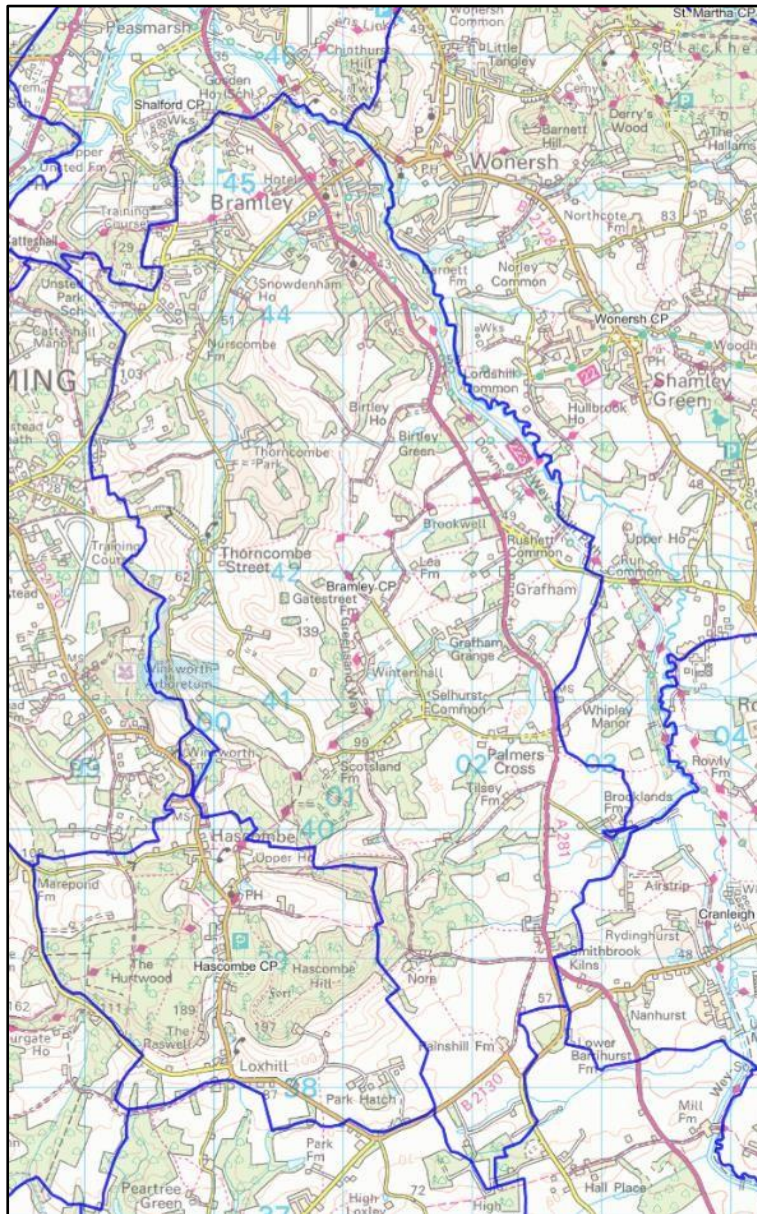
1. **Introduction**

- 1.1 This Habitats Regulations Assessment (HRA) screening determination has been undertaken by Base Planning and Design Ltd on behalf of Waverley Borough Council in their duty to determine whether the Bramley Neighbourhood Plan requires an Appropriate Assessment. This screening assessment is based on the Neighbourhood Plan dated 27th March 2020.
- 1.2 In accordance with Article 6 of the Habitats Directive (92/43/EEC) and Regulation 105 of the Conservation of Habitats & Species Regulations 2017, the Borough Council is the competent authority for determining if a plan requires Appropriate Assessment.

2. **Background to the Bramley Neighbourhood Plan**

- 2.1 The Neighbourhood Planning (General) Regulations (2012) make provision for Parish Councils or Neighbourhood Forums to prepare Neighbourhood Plans. Whilst not forming part of a local authority's Local Plan, Neighbourhood Plans do form part of the Development Plan for an area as set out in Section 38 of the Planning & Compulsory Purchase Act 2004 (as amended). As such, Neighbourhood Plans are a material consideration in taking planning decisions and can contain policies on a range of issues including the allocation of sites/land for development.
- 2.2 The proposed Bramley Neighbourhood Plan covers all of the area within the jurisdiction of Bramley Parish Council. The Neighbourhood Plan Area lies to the east of Godalming and south of Guildford in Surrey. The plan area contains the village of Bramley as well as a number of hamlets such as Birtley Green, Grafham, Thorncombe Street, Palmer's Cross, Rushett Common and Smithbrook. The area is predominantly rural, characterised by agricultural field patterns and small wooded copses. A plan of the designated area is shown in Plan 1-1.

Plan 1-1: Map of the Designated Area for the Bramley Neighbourhood Plan.



- 2.3 There are numerous areas of woodland/copses designated as ancient/semi-natural or ancient replanted woodland which are also identified as priority habitat (deciduous woodland) as well as a number of areas of woodpasture and parkland which is a national Biodiversity Action Plan (BAP) designation. Priority habitat designations also include good quality semi-improved grassland and lowland meadows. Protected species include Brown hairstreak (butterfly), Lapwing and Curlew. There are no SSSIs located in the Neighbourhood Plan area.
- 2.4 The Neighbourhood Plan area lies within 11km of The Mens SAC, 9.4km of the Ebernoe SAC, 5km of the Wealden Heaths Phase I SPA (including the Thursley, Ash, Pirbright & Chobham SAC, Thursley, Hankley & Frensham Commons SPA and Thursley & Ockley Bog Ramsar. The Neighbourhood

Plan area is also 7.2km from the Thames Basin Heaths SPA, 16km from the Mole Gap to Reigate Escarpment SAC, 10km from the Wealden Heaths Phase II SPA and 18.4km from Woolmer Forest SAC.

2.5 The Hascombe, Winkworth and Hydon's Heath and Woods Biodiversity Opportunity Area (BOA)⁵ also lies within the Neighbourhood Plan area which is a section of the densely contoured Greensand ridge between two tributary valleys of the River Wey. The Neighbourhood Plan area also lies within the Surrey Hills Area of Outstanding Natural Beauty (AONB).

2.6 The Bramley Neighbourhood Plan dated 27 March 2020 sets out the vision for the Neighbourhood Plan area which is:-

'To support the organic development of Bramley to meet the objectively assessed needs of all members of its community using a planned and balanced approach, that seeks to improve the facilities and services for all residents whilst focusing on the need to improve accessibility to housing in Bramley for younger people, allowing individuals and families to live their lives in Bramley from cradle to grave.'

2.7 The Neighbourhood Plan also contains 7 objectives under the headings support a thriving local economy, provide sufficient housing for local people and enhance the sustainability of community services and infrastructure.

2.8 The Bramley Neighbourhood Plan dated 27 March 2020 contains a total of 26 policies covering a range of issues such as housing, employment, retail, infrastructure, transport, community, design and local green spaces. The Neighbourhood Plan reviews and amends the settlement boundary of Bramley with Policy BNP-G4 extending the village boundary south. Policy BNP-H1 sets out a housing requirement for the Neighbourhood Plan area based on the Waverley Part 1 Local Plan requirement for Bramley of 90 dwellings. This will be achieved through 95 dwellings which have already been completed/permitted; two allocations sites, both of which are for 8 dwellings (although para 9.2 of the plan identifies one for ten units) with one site already permitted; as well as rural exceptions and windfalls. The plan also sets out the potential for 24 additional units to come from Smithsbrook Kilns subject to whether the site is brownfield or not. As such, the plan has the potential to provide an additional 32 units above the 95 already completed/permitted.

2.9 Neighbourhood Plan Policy BNP-E2 seeks creation and preservation of wildlife corridors, BNP-I3 seeks to avoid unacceptable risks to air quality.

2.10 The adopted Waverley Part 1 Local Plan contains the following objective: *'To protect and enhance Waverley's biodiversity, including its wildlife species and their habitats, both on designated sites such as the Thames Basin Heaths and Wealden Heaths (Phases 1 and 2) Special Protection Areas'.*

⁵ Biodiversity Opportunity Areas: the basis for realising Surrey's ecological network (2019) Surrey Nature Partnership. Available at: <https://surreynaturepartnership.org.uk/our-work/>

- 2.11 The Spatial Strategy of the Part 1 Local Plan focuses development in and around the Borough's four largest settlements and allowing moderate growth in larger villages such as Bramley. The Part 1 Local Plan sets a housing requirement over the Plan period (2013-2032) of 11,210 dwellings with a requirement for Bramley of 90 dwellings but does not allocate any strategic sites within the Neighbourhood Plan area.
- 2.12 The Part 1 Local Plan also contains a number of other general policies covering design, transport and protection of the natural and historic environments and these have been taken into account in the Neighbourhood Plan. The Part 2 Local Plan is currently at the preferred options stage of preparation and does not propose allocating any sites identified in the Neighbourhood Plan.
- 2.13 The Part 1 Local Plan has been the subject of Sustainability Appraisal (including the requirements for Strategic Environmental Assessment) as well as Habitats Regulations Assessment (HRA).
- 2.14 The HRA accompanying the adopted Part 1 Local Plan identifies a number of potential impact pathways including urbanisation, recreational pressure, atmospheric pollution, water abstraction and water quality to the following European Sites:
- Wealden Heaths Phase I (Thursley, Hankley & Frensham Commons SPA, Thursley, Ash, Pirbright & Chobham SAC and Thursley & Ockley Bogs Ramsar)
 - Thames Basin Heaths SPA
 - Wealden Heaths Phase II
- 2.15 The Part 1 Local Plan HRA also considers a number of European sites which sit outside of the Local Plan boundary. The HRA found that most of the European Sites lying outside of the Local Plan area could be screened out with no likely significant effects and as such there is no reason to depart from that finding in this HRA screening. However, the HRA could not conclude that no likely significant effects would exist without mitigation for the following:
- Recreational Pressure on Mole Gap to Reigate Escarpment SAC, Ebernoe Common SAC and The Mens SAC; and
 - Atmospheric Pollution on Butser Hill SAC, Mole Gap to Reigate Escarpment SAC, and on Woolmer Forest SAC;
- 2.16 Further, the sites proposed for allocation in the Neighbourhood Plan have not been the subject of HRA at any stage. In this respect the proposed allocation sites lie between 7.5-8.3km from the Wealden Heaths Phase I SPA which incorporates the Thursley, Ash, Pirbright & Chobham SAC, Thursley, Hankley and Frensham Commons SPA and the Hankley & Ockley Bog Ramsar. 12.5-13km from the Wealden Heaths Phase II SPA, 11.3-15.4km from the Ebernoe Common SAC, 12.7-17.7km from The Mens SAC, 20.7-21.7km from Woolmer Forest SAC, 9-14.1km from the Thames Basin

Heaths SPA, 16-18.5km to the Mole Gap to Reigate Escarpment SAC and 35-37km from the Butser Hill SAC.

3. **Habitats Regulations Assessment (HRA) – Screening**

- 3.1 The need to undertake an Appropriate Assessment as part of an HRA is set out within the EC Habitats Directive 92/43/EEC and transposed into British Law by Regulation 105 of the Conservation of Habitats and Species Regulations 2017. The Appropriate Assessment stage of HRA is only required should the preliminary screening assessment not be able to rule out likely significant effects.
- 3.2 The European Habitats Directive requires that any plan or project likely to have a significant effect on a European site must be subject to an Appropriate Assessment. Schedule 2 of the Neighbourhood Planning (General) Regulations 2012 sets out a general presumption that Neighbourhood Plans are not likely to have a significant effect on European sites. Schedule 2 also amends the Conservation of Habitats and Species Regulations 2010 (now the 2017 Regulations) so as to apply its provisions to neighbourhood development orders and neighbourhood plans. It also inserts new regulation 78A (now Regulation 81) which provides that a neighbourhood development order may not grant planning permission for development which is likely to have a significant effect on a European site and Regulation 102 (now Regulation 106) deals with Neighbourhood Plans.
- 3.3 Whilst Schedule 2 of the Neighbourhood Planning (General) Regulations 2012 set out a general presumption that an HRA is unlikely to be required, it is still necessary to carry out a screening assessment.
- 3.4 The Habitats Directive states that any plan or project not connected to or necessary for a site's management, but likely to have significant effects thereon shall be subject to appropriate assessment. There are four distinct stages in HRA namely: -

Step 1: Screening – Identification of likely impacts on a European site either alone or in combination with other plans/projects and consideration of whether these are significant. Following the decision of the ECJ in the *People Over Wind & Sweetman v. Coillite Teoranta* (C-323/17) case, avoidance and/or mitigation measures cannot be taken into account at the screening stage and it is purely an exercise to determine if possible pathways for effect exist and whether these can be ruled out taking account of the precautionary principle. It is the opinion of this HRA screening assessment that adopted policies of the current development plan and submission policies in the Neighbourhood Plan act as avoidance/mitigation and cannot be taken into account at this stage of HRA. Similarly any HRA undertaken for other development plan documents which have not been through Examination in Public (EiP) and found sound should only be given limited weight.

Step 2: Appropriate Assessment – consideration of the impact on the integrity of the European Site whether alone or in combination with other plans or projects with respect to the sites structure, function and

conservation objectives. Where there are significant effects, step 2 should consider potential mitigation measures.

Step 3: Assessment of Alternative Solutions – Assessing alternative ways of achieving the objectives of the plan/project which avoid impacts; and

Step 4: Assessment of Compensatory Measures – Identification of compensatory measures should impact not be avoided and no alternative solutions exist and an assessment of imperative reasons of overriding public interest (IROPI) deems that a project should proceed.

- 3.5 Should step 1 reveal that significant effects are likely or effect cannot be discounted because of uncertainty, then it is necessary to move onto step 2: Appropriate Assessment. If step 2 cannot rule out significant effect even with mitigation, then the process moves onto step 3 and finally step 4 if no alternative solutions arise.

Step 1 - Screening

- 3.6 There are four stages to consider in a screening exercise: -

Stage 1: Determining whether the plan/project is directly connected with or necessary to the management of the site;

Stage 2: Describing the plan/project and description of other plan/projects that have the potential for in-combination impacts;

Stage 3: Identifying potential effects on the European site(s); and

Stage 4: Assessing the significance of any effects

- 3.7 Stage 1

It can be determined that the Bramley Neighbourhood Plan is not directly connected with or necessary to the management of a European site.

- 3.8 Stage 2

Information about the Neighbourhood Plan can be found in paragraphs 2.1 to 2.9 of this screening assessment. Table 1-1 lists those other plans and projects, which may have in combination impacts.

Table 1-1: Other Key Plans/Projects

Plan / Project	<p>National Planning Policy Framework (2019): High level national planning policy covering topics such as housing, economy, employment, retail as well as biodiversity, flood risk and heritage.</p> <p>South East Plan 2009: Saved Policy NRM6 sets out protection for the Thames Basin Heaths SPA.</p> <p>Waverley Local Plan Part 1 2013-2032: Sets policies for the consideration of development and the spatial strategy for the Borough including provision of 11,210 dwellings with 1,700 at Cranleigh.</p> <p>Waverley Local Plan Part 2 (Preferred Options): Includes a number of development management policies and sites allocated for development.</p> <p>Other Local Authority Local Plans within 10km or adjoining sites: Housing target for areas around European sites set out in Table 1-2.</p> <p>Large Scale Projects within 10km or adjoining European Sites: Large scale projects within 10km are subsumed in the consideration of 'Other Local Authority Local Plans' above.</p> <p>Thames Basin Heaths Joint Delivery Framework 2009: Sets out the agreed Framework regarding the approach and standards for avoiding significant effects on the Thames Basin Heaths SPA.</p> <p>Environment Agency, Thames River Basin District Management Plan (2015): Sets out actions to improve water quality. Future aims for the River Wey include implementing Lower Wey Oxbow Restoration Project to enhance and restore the main Wey river channel and Wey Diffuse Advice Project throughout the catchment.</p> <p>Environment Agency, Thames Catchment Flood Management Plan (2009): Aim is to promote more sustainable approaches to managing flood risk. Will be delivered through a combination of different approaches.</p> <p>Environment Agency, River Wey Catchment Abstraction Management Strategy (2019): identifies the Wey having restricted 'Water available for licensing'.</p> <p>Environment Agency, Water Resources Strategy: Regional Action Plan for Thames Region (2009): Key priorities for Thames region include ensuring sufficient water resources are available, making water available in over-abstracted catchments and reducing demand.</p>
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Table set 1-2: List of Local Authority Housing Targets within 10km of European Sites

Wealden Heaths Phase I SPA

Local Plan Area	Housing Target
Waverley Borough	11,210
Guildford Borough	10,678
Rushmoor Borough	8,884
East Hampshire	10,060
South Downs National Park	4,750
Total	45,582

Thames Basin Heaths SPA

Local Plan Area	Housing Target
Waverley Borough	11,210
Guildford Borough	10,678
Woking Borough	4,964
Surrey Heath Borough	3,240
Runnymede Borough	7,507
Elmbridge Borough	3,375
Bracknell Forest Borough	11,139
Windsor & Maidenhead	14,260
Wokingham Borough	13,230
Rushmoor Borough	8,884
Hart District	7,614
Total	96,101

Wealden Heaths Phase II SPA (& Woolmer Forest SAC)

Local Plan Area	Housing Target
Waverley Borough	11,210
East Hampshire District	10,060
South Downs National Park	4,750
Horsham District	16,000
Chichester District	7,388
Total	49,408

Ebernoe SAC and The Mens SAC

Local Plan Area	Housing Target
Waverley Borough	11,210
South Downs National Park	4,750
Horsham District	16,000
Chichester District	7,388
Total	39,348

Mole Gap to Reigate Escarpment SAC

Local Plan Area	Housing Target
Mole Valley	3,760
Reigate & Banstead	6,900
Tandridge	2,500
Epsom & Ewell	3,620
Elmbridge	3,375
Guildford	10,678
Waverley	11,210
Woking	4,964
Total	47,007

3.9 Stage 3

Information regarding the European site(s) screened and the likely effects that may arise due to implementation of the Neighbourhood Plan can be found in Tables 1-3 to 1-9 and 1-10. All other European Sites were screened out of this assessment at an early stage as it was considered that their distance from the Neighbourhood Plan area coupled with the nature and content of the proposed Neighbourhood Plan meant that there is no pathway or mechanism which would give rise to significant effect either alone or in combination. In this respect regard has been had to the Local Plan Part 1 HRA.

Table 1-3: Details of Thames Basin Heaths SPA and Potential Effects Thereon

European site:	Thames Basin Heaths Special Protection Area (SPA).
Site description:	The Thames Basin Heaths SPA was proposed in October 2000, and full SPA status was approved on 9 March 2005. It covers an area of some 8,274 ha, consisting of 13 Sites of Special Scientific Interest (SSSI) scattered from Surrey, to Berkshire in the north, through to Hampshire in the west. The habitat consists of both dry and wet heathland, mire, oak, birch acid woodland, gorse scrub and acid grassland with areas of rotational conifer plantation.

European site:	Thames Basin Heaths Special Protection Area (SPA).
Relevant international nature conservation features:	<p>Thames Basin Heaths SPA qualifies under Article 4.1 of the Birds Directive (79/409/EEC) by supporting populations of European importance of the following species listed on Annex I of the Directive:</p> <p>During the breeding season:</p> <ul style="list-style-type: none"> - Nightjar <i>Caprimulgus europaeus</i>: 7.8% of the breeding population in Great Britain (count mean, 1998-1999); - Woodlark <i>Lullula arborea</i>: 9.9% of the breeding population in Great Britain (count as at 1997); - Dartford warbler <i>Sylvia undata</i>: 27.8% of the breeding population in Great Britain (count as at 1999).
Environmental conditions which support the site	<ul style="list-style-type: none"> • Appropriate management • Management of disturbance during breeding season (March to July) • Minimal air pollution • Absence or control of urbanisation effects, such as fires and introduction of invasive non-native species • Maintenance of appropriate water levels • Maintenance of water quality
Potential effects arising from the Neighbourhood Plan	Indirect effects arising from disturbance due to recreational activity on the SPA, atmospheric pollution and water resource as well as potential for direct urbanising impacts.

Table 1-4: Details of Wealden Heaths Phase I & II SPA (Thursley, Hankley & Frensham Commons SPA, Thursley, Ash, Pirbright & Cobham SAC and Thursley & Ockley Bogs Ramsar) and Potential Effects Thereon

International site:	Wealden Heaths Phase I SPA
Site description:	The Wealden Heaths Phase I & II SPAs covers an area of some 3,924 ha with areas of wet and dry heathland, valley bogs, broad-leaved and coniferous woodland, permanent grassland and open water.

International site:	Wealden Heaths Phase I SPA
Relevant international nature conservation features:	<p>The Wealden Heaths Phase I & II (Thursley, Hankley and Frensham Commons) Special Protection Area qualifies under Article 4.1 of the Birds Directive (79/409/EEC) by supporting breeding populations of European importance of the following species listed on Annex I of the Directive:</p> <ul style="list-style-type: none"> - Nightjar <i>Caprimulgus europaeus</i> - Woodlark <i>Lullula arborea</i> - Dartford warbler <i>Sylvia undata</i> <p>These species nest on or near the ground and as a result are susceptible to predation and disturbance.</p> <p>Thursley, Ash, Pirbright and Chobham Special Area of Conservation is designated for three Annex I habitats.</p> <p>The qualifying Annex 1 habitats are:</p> <ul style="list-style-type: none"> - Wet heathland with cross-leaved heath - Dry heaths - Depressions on peat substrates <p>Thursley and Ockley Bog Ramsar site qualifies under two of the nine Ramsar criteria.</p>
Environmental Conditions which Support the Site	<ul style="list-style-type: none"> • Appropriate management; • Managed recreational pressure; • Minimal air pollution; • Absence or control of urbanisation effects such as fires and introduction of invasive non-native species; <input type="checkbox"/> • Maintenance of appropriate water levels; • Maintenance of water quality.
Potential Effects Arising from the Neighbourhood Plan	Indirect effects arising from disturbance due to recreational activity on the SPA, atmospheric pollution and water resource as well as potential for direct urbanising impacts.

Table 1-5: Details of Ebernoe Common SAC and Potential Effects Thereon

International site:	Ebernoe Common SAC
Site description:	The Ebernoe Common SAC covers an area of some 235 ha with an extensive block of beech <i>Fagus sylvatica</i> high forest and former wood-pasture over dense holly <i>Ilex aquifolium</i> , and has a very rich epiphytic lichen flora, including <i>Agonimia octospora</i> and <i>Catillaria atropurpurea</i> . It represents Atlantic acidophilous beech forests in the south-eastern part of the habitat's UK range.
Relevant international nature conservation features:	A maternity colony of barbastelles <i>Barbastella barbastellus</i> with species appearing to be present throughout the year. A maternity colony of Bechstein's bat <i>Myotis bechsteinii</i> is associated with this area.
Environmental Conditions which Support the Site	Managed recreational pressure.
Potential Effects arising from the Neighbourhood Plan	Indirect effects arising from disturbance due to recreational activity.

Table 1-6: Details of Mole Gap to Reigate Escarpment SAC and Potential Effects Thereon

International site:	Mole Gap to Reigate Escarpment SAC
Site description:	The Mole Gap to Reigate Escarpment SAC covers an area of some 892 ha with european dry heaths, <i>Asperulo-Fagetum</i> beech forests and supports Annex II species that are a qualifying feature, but not a primary reason for site selection.
Relevant international nature conservation features:	Great crested newt <i>Triturus cristatus</i> Bechstein`s bat <i>Myotis bechsteinii</i>
Environmental Conditions which Support	Managed recreational pressure; Minimal air pollution.

International site:	Mole Gap to Reigate Escarpment SAC
the Site	
Potential Effects Arising from the Neighbourhood Plan	Indirect effects arising from disturbance due to recreational activity and atmospheric pollution.

Table 1-7: The Mens SAC and Potential Effects Thereon

International site:	The Mens SAC
Site description:	The Mens SAC covers an area of some 205 ha with Atlantic acidophilous beech forests with Ilex and sometimes also Taxus in the shrublayer (Quercion robur-petraeae or Ilici-Fagenion) for which this is considered to be one of the best areas in the United Kingdom.
Relevant international nature conservation features:	Barbastella barbastellus for which the area is considered to support a significant presence.
Environmental Conditions which support the Site	Managed recreational pressure.
Potential Effects arising from the Neighbourhood Plan	Indirect effects arising from disturbance due to recreational activity.

Table 1-8: Butser Hill SAC and Potential Effects Thereon

International site:	Butser Hill SAC
Site description:	The Butser Hill SAC covers an area of some 237ha. Butser Hill is situated on the east Hampshire chalk which forms part of the South Downs. Much of the site consists of <i>Festuca ovina</i> – <i>Avenula pratense</i> grassland. The site exhibits various transitions between semi-natural dry grassland, chalk heath, mixed scrub and <i>Taxus baccata</i> woods.
Relevant international nature conservation features:	Dense yew <i>Taxus baccata</i> woodland in association with scrub and chalk grassland.
Environmental Conditions which Support the Site	Minimal air pollution;
Potential Effects Arising from the Neighbourhood Plan	Indirect effects arising from atmospheric pollution

Table 1-9: Woolmer Forest SAC and Potential Effects Thereon

International site:	Woolmer Forest SAC
Site description:	The Woolmer Forest SAC covers an area of some 670ha with European dry heaths, natural dystrophic lakes and ponds and depressions of peat substrate with Rhynchosporion.
Relevant international nature conservation features:	Northern Atlantic wet heaths with Erica tetralix Transition mires and quaking bogs
Environmental Conditions which Support the Site	Minimal air pollution;
Potential Effects arising from the Neighbourhood Plan	Indirect effects arising from atmospheric pollution.

3.10 Stage 4

The consideration of potential effects are set out in Table 1-10.

Table 1-10: Assessment of Potential Effects

Potential Effect	Assessment
Indirect effect from recreational disturbance and urbanisation.	<p>The likely effects of recreational disturbance have been summarised in the Underhill-Day study for Natural England and RSPB (2005); this provides a review of the urban effects on lowland heaths and their wildlife. The main issues relating to the conservation objectives and the integrity of the SPAs and SAC's effected by recreational disturbance as a whole are: fragmentation, disturbance, fires, cats, dogs (as a result of nest disturbance and enrichment), prevention of management, off-roading, vandalism and trampling.</p> <p>Natural England has advised that recreational pressure, as a result of increased residential development within 5km of the Thames Basin Heaths SPA & Thursley, Ash, Pirbright & Chobham SAC (or sites of 50 or more dwellings within 7km), is having a significant adverse impact on the Annex I bird species. Woodlark and Nightjar are ground nesting and Dartford Warblers nest close to the ground. They are therefore sensitive to disturbance, particularly from dogs, but also from walkers, and cyclists etc. They are, in addition, vulnerable to other effects of urbanisation, in particular predation by cats.</p> <p>Joint work involving Natural England and the authorities affected by the SPA/SAC have agreed a mechanism to avoid impacts to the SPA/SAC from recreational activities in the form of Suitable</p> <p>Alternative Natural Greenspace (SANG) and Strategic Access Management & Monitoring (SAMM) and from the impacts of urbanisation by not allowing any net additional dwellings within 400m of the SPA. This mechanism and distance for effects has also been used as a proxy for other sites where urbanisation and/or recreational impact has been identified as a pathway unless indicated otherwise.</p> <p>In terms of Wealden Heaths Phase I & II SPAs Natural England has advised that major developments within 5km of this site should be subject to HRA and sites considered on a case by</p>

Potential Effect	Assessment
	<p>case basis.</p> <p>The Local Plan Part 1 HRA sets out that the Ebernoe SAC 'is considered to be susceptible to disturbance, which may arise through excessive recreational pressure. In the absence of precise visitor survey data, and given the susceptibility of the SAC it is not possible, prior to mitigation to conclude that the Plan will not lead to adverse effects alone or in combination with development in other relevant local Authorities'.</p> <p>For the Mole Gap to Reigate Escarpment SAC the Local Plan Part 1 HRA states 'low recreational pressure is considered to be important in the maintenance of site integrity. Given that the SAC lies within the typical distance over which visitors will travel to reach a countryside site for a day visit, and that the SAC is sensitive to recreational pressure it is not possible, prior to mitigation to conclude that the Plan will not lead to adverse effects alone or in combination with development in other relevant local authorities.'</p> <p>In respect to The Mens SAC the Local Plan Part 1 HRA states 'this site is managed as minimum intervention and thus its habitats are potentially at risk from excessive recreational pressure. In the absence of precise visitor survey data, and given the susceptibility of the SAC it is not possible, prior to mitigation to conclude that the Plan will not lead to adverse effects alone or in combination with development in other relevant local authorities.'</p> <p>The Bramley Neighbourhood Plan does not allocate any land or sites for net additional dwellings within 400m of the Thames Basin Heaths SPA, Thursley, Ash, Pirbright & Chobham SAC or the Wealden Heaths SPAs or any other European site. As such, there is no pathway for direct urbanising impacts arising from the plan.</p> <p>Whilst the boundary of the plan is 5km from the Wealden Heaths Phase I SPA, it does not propose any development within 5km of the Wealden Heaths SPAs and Thursley, Ash, Pirbright and Chobham SAC where Natural England has advised that sites should be considered on a case by case</p>

Potential Effect	Assessment
	<p>basis as significant effect cannot be ruled out.</p> <p>Given the distance of over 7km from the plan boundary to the Thames Basin Heaths SPA, it is considered that there is no pathway for recreational impacts to the SPA, based on the distance of 5km for recreational impacts (or 7km from large sites) set out in the SPA Delivery Plan.</p> <p>The Mole Gap to Reigate Escarpment, Ebernoe and The Mens SACs lie some distance from the neighbourhood plan area and the allocation sites, however the Local Plan Part 1 HRA could not discount likely significant effect in the absence of avoidance/mitigation mainly due to a lack of visitor survey data. Natural England has now confirmed that a distance of 10km can be used to screen out European sites in respect of recreational impact. Whilst parts of the Plan boundary are within 10km of the Ebernoe Common SAC , none of the proposed allocations are within 10km of all three sites and therefore there is no pathway for effect.</p> <p>As such, in the absence of avoidance and/or mitigation measures which cannot be taken into account at the screening stage of HRA (including any adopted policies in the Local Plan Part 1) and in-combination with other plans and projects it is considered, at the time of undertaking this assessment, that the Bramley Neighbourhood Plan will not have likely significant effects on European sites either alone or in combination with respect to recreational pressure.</p> <p>In this respect an Appropriate Assessment is not required.</p>
Atmospheric Pollution	<p>The Local Plan Part 1 HRA concludes no likely significant effect as a result of atmospheric pollution in combination with other plans and projects on the Thames Basin Heaths SPA, Wealden Heaths SPAs given the findings of the Council's air quality evidence. However, this is on the basis of the transport interventions identified within the plan and its policies which are a form of avoidance/mitigation. This is also the case in relation to the Butser Hill, Mole Gap to Reigate Escarpment and Woolmer Forest SAC's.</p>

Potential Effect	Assessment
	<p>Department of Transport's, Transport Analysis Guidance states that beyond 200m the contribution of vehicle emissions from the roadside to local pollution levels is not significant. None of the highways lying within the Plan area sit within 200m of any European site and as such the plan individually, is unlikely to have significant effect.</p> <p>The Neighbourhood Plan area lies 5km from the Wealden Heaths Phase I SPA and its component parts, although the allocation sites are over 5km from the SPA, over 7km from the Thames Basin Heaths SPA, 10km to Wealden Heaths Phase II, 16km from the Mole Gap to Reigate Escarpment SAC, 20km to Woolmer Forest SAC and 35km from the Butser Hill SAC. Given the distance between the Neighbourhood Plan area and the distance visitors are likely to travel to these European sites and hence roads lying within 200m of these sites where air quality standards could be exceeded, it is considered that there is no pathway for effect.</p> <p>In this respect, and not taking account of any avoidance/mitigation at this screening stage of HRA, including the submission policies of the Neighbourhood Plan, it is considered, at the time of undertaking this HRA that it can be concluded that the Bramley Neighbourhood Plan with respect to its allocations will not give rise to likely significant effects arising from atmospheric pollution either alone or in combination with other plans and projects.</p> <p>In this respect an Appropriate Assessment is not required.</p>
Water Resource	<p>The Local Plan Part 1 HRA states that <i>'it has already been noted that the security of water supply is beyond the scope of Waverley Borough to influence, and it is considered that the Council has taken all appropriate measures to minimise any contribution to the overall pressures on water resources in the Guildford Water Resource Zone'</i>.</p> <p>The HRA also states that the control of water availability is largely the responsibility of the Environment Agency and Thames Water. It further states that the Environment Agency considers it will be possible for water companies</p>

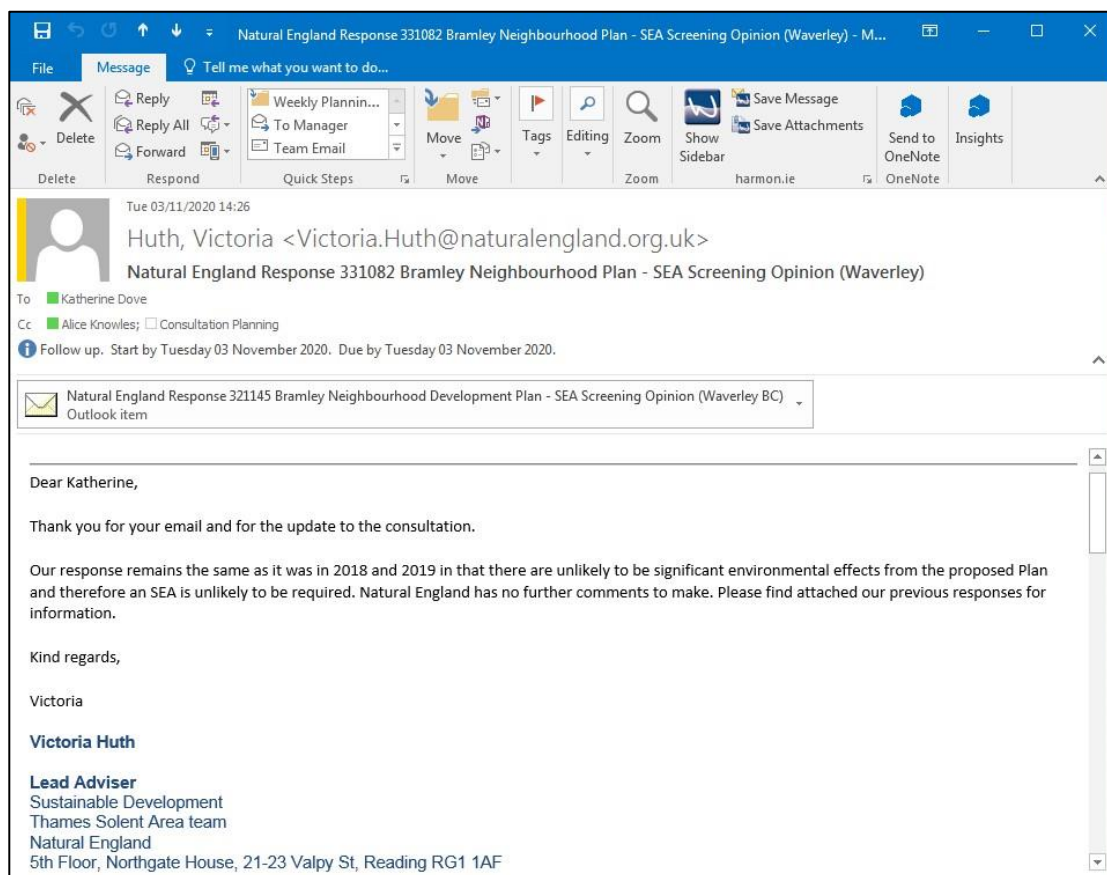
Potential Effect	Assessment
	<p>to meet future water resource requirements in Waverley without increased abstractions from watercourses and groundwaters that are of importance to the Thames Basin Heaths, Wealden Heaths SPA and Thursley, Ash, Pirbright and Chobham SAC.</p> <p>For the Thames Basin Heaths, Wealden Heaths SPA and Thursley, Ash, Pirbright & Chobham SAC significant effect is ruled out in the Part 1 HRA on the premise of securing strategic water resource options, leakage control and increasing water efficiencies which themselves are a form of avoidance and mitigation as are the policies set out in the Part 1 Local Plan.</p> <p>The Neighbourhood Plan area lies within the Wey operational catchment, specifically within the Cranleigh Waters water body. The Environment Agency Catchment Data shows the Cranleigh Waters water body flowing northwards (downstream) into the Wey (Shalford to River Thames Confluence at Weybridge) with no water body upstream.</p> <p>The Thames Basin Heaths, Wealden Heaths SPA's (phase I & II) and Thursley, Ash, Pirbright & Chobham SAC are not located within the same water body as the Neighbourhood Plan and neither do they lie downstream of the plan area.</p> <p>The Plan area also lies within the Godalming Lower Greensand groundwater operational catchment, which also contains the Wealden Heaths SPA's and their component parts but not the Thames Basin Heaths SPA. As of 2016, the groundwater unit has poor quantitative and chemical status, however this is due to abstraction by the water industry and pollution from agriculture which are beyond the scope of the Plan.</p> <p>As such, there are no pathways for effect in terms of water quality or resource as a result of the Neighbourhood Plan to any European site. In this respect and not taking account of any avoidance/mitigation at this screening stage of HRA, it is considered, at the time of undertaking this HRA that it can be concluded that the</p>

Potential Effect	Assessment
	<p>Bramley Neighbourhood Plan with respect to its allocations will not give rise to likely significant effects arising from water resource or quality either alone or in combination with other plans and projects.</p> <p>In this respect an Appropriate Assessment is not required.</p>

- 3.11 It is the conclusion of this HRA that following a screening assessment it can be ascertained, in light of the information available at the time of assessment that the Bramley Neighbourhood Plan will not give rise to significant effects on European Sites either alone or in-combination with other plans and/or projects.
- 3.12 Given the findings of this screening assessment a full appropriate assessment is not required.
- 3.13 This HRA screening assessment was made on the 24 August 2020.

Appendix 3: Statutory Consultee Responses

Natural England's response:



Natural England Response 321145 Bramley Neighbourhood Development Plan - SEA Screening Opinion (...)

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Fri 31/07/2020 17:40

Huth, Victoria <Victoria.Huth@naturalengland.org.uk>

Natural England Response 321145 Bramley Neighbourhood Development Plan - SEA Screening Opinion (Waverley BC)

To Planning Policy

270213 Natural England Response. Bramley Neighbourhood Plan. Reg 14.PDF
325 KB

251793 Natural England Response Letter.PDF
135 KB

Dear Alice,

Application ref: Bramley Neighbourhood Plan

Our ref: 321145

Thank you for your recent consultation relating to Bramley Neighbourhood Plan: Strategic Environmental Assessment (SEA) - revised HRA screening.

Please find attached our previous responses which are still appropriate for this consultation.

Kind regards,

Victoria

Victoria Huth

Lead Adviser
Sustainable Development
Thames Solent Area team

Date: 15 February 2019
Our ref: 270213



Waverley Borough Council

BY EMAIL ONLY

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

T 0300 060 3900

Dear Sir or Madam,

Planning Consultation: Bramley Neighbourhood Plan. Reg 14.

Thank you for your consultation on the above dated 11th January 2019.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

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

In our review of the Bramley Neighbourhood Plan we have a few comments to make:

- **Surrey Hills AONB:** Surrey Hills AONB should be protected and enhanced. Paragraph 172 of the NPPF describes the strong protection afforded to AONBs. As Bramley parish lies largely within Surrey Hills AONB, it is a requirement to ensure that any application for a new development in the Parish which may affect the AONB includes a Landscape Visual Impact Assessment (LVIA). We recommend that an AONB policy is included in the Neighbourhood Plan which seeks to protect and enhance the AONB and also mentions the following, "All new development will be required to submit a Landscape Visual Impact Assessment (LVIA) following the Guidelines for Landscape and Visual Impact Assessment (3rd edition) as part of an application".
- **Policy BNP-E2: Creation and Preservation of Wildlife Corridors and Habitats** - As acknowledged in the policy, wildlife corridors and habitats should be protected and enhanced. This policy could be slightly reworded to appear more positive. For example, instead of saying "No development may occur which requires blocking or building across any of the designated Wildlife corridors or Habitats..." you could say, "Development will be supported that protects and enhances connectivity and free movement of wildlife along wildlife corridors and habitats. It may be worth consulting with the Surrey Wildlife Trust or other experts to ensure suitable mitigation measures if needed."
- **Nearby designated sites:** Please ensure the following nearby designated sites are taken into account when allocating development to guarantee no negative impacts upon them: Wealden Heaths Phase I SPA, Wey Valley Meadows SSSI, Blackheath SSSI, Charterhouse to Eashing SSSI and Chiddingfold Forest SSSI.

We would like to draw your attention to the requirement to conserve biodiversity and provide a net gain in biodiversity through planning policy (Section 40 of the Natural Environment and Rural Communities Act 2006 and paragraphs 170 and 175 of the National Planning Policy Framework). Please ensure that any development policy in your plan includes wording to ensure "all development results in a biodiversity net gain for the parish". Where appropriate, on-site enhancements such as new roosting features for bats or nesting features for birds should be incorporated into the fabric of development. Policies around Biodiversity Net Gain should propose the use of a biodiversity measure for development proposals. Examples of calculation methods are included in Annex A.

The recently produced [Neighbourhood Plan for Benson](#), in South Oxfordshire provides an excellent example. The plan has recently received the go ahead at referendum, and we are of the opinion that the policy wording around the Environment, Green Space and Biodiversity is exemplary. We would recommend you considering this document when reviewing yours.

Further Recommendations

Natural England would also like to highlight that removal of green space in favour of development may have serious impacts on biodiversity and connected habitat and therefore species ability to adapt to climate change. We recommend that the final local plan include:

- Policies around connected Green Infrastructure (GI) within the parish. Elements of GI such as open green space, wild green space, allotments, and green walls and roofs can all be used to create connected habitats suitable for species adaptation to climate change. Green infrastructure also provides multiple benefits for people including recreation, health and well-being, access to nature, opportunities for food growing, and resilience to climate change. Please see Paragraph 171 of the NPPF for further reference. Annex A provides examples of Green Infrastructure.

Strategic Environmental Assessment and Habitats Regulation Assessment

Where Neighbourhood Plans could have significant environmental effects, they may require a Strategic Environmental Assessment (SEA) under the Environment Assessment of Plans and Programmes Regulations 2004. Further guidance on deciding whether the proposals are likely to have significant environmental effects and the requirements for consulting Natural England on SEA are set out in the National Planning Practice Guidance [here](#).

Where a neighbourhood plan could potentially affect a European protected site, for example a Special Protection Area or Special Area of Conservation, it will be necessary to screen the plan in relation to the Conservation of Habitats and Species Regulations (2010), as amended (the 'Habitats Regulations'). One of the basic conditions that will be tested at Examination is whether the making of the plan is compatible with European obligations and this includes requirements relating to the Habitats Directive, which is transposed into the Habitats Regulations.

Annex A provides information on the natural environment and issues and opportunities for your Neighbourhood planning.

Yours sincerely,

Victoria Huth
Sustainable Development
Thames Team

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

Natural Environment Information Sources

The [Magic¹](http://magic.defra.gov.uk/) website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification**, **Ancient Woodland**, **Areas of Outstanding Natural Beauty**, **Local Nature Reserves**, **National Parks (England)**, **National Trails**, **Priority Habitat Inventory**, **public rights of way** (on the Ordnance Survey base map) and **Sites of Special Scientific Interest** (including their impact risk zones). Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available [here²](#).

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here³](#). Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here⁴](#).

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

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

General mapped information on soil types and **Agricultural Land Classification** is available (under 'landscape') on the [Magic⁵](#) website and also from the [LandIS website⁶](#), which contains more information about obtaining soil data.

Natural Environment Issues to Consider

The [National Planning Policy Framework⁷](#) sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance⁸](#) sets out supporting guidance.

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

¹ <http://magic.defra.gov.uk/>

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

³ <http://web.archive.nationalarchives.gov.uk/20140711133551/http://www.naturengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habitatandspeciesimportance.aspx>

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

⁵ <http://magic.defra.gov.uk/>

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

⁷ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/733637/National_Planning_Policy_Framework_web_accessible_version.pdf

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

Paragraph 170 of the National Planning Policy Framework (NPPF) highlights the need to protect and enhance valued landscapes through the planning system. Your plan may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

Wildlife habitats

Priority and protected species and habitat

Ancient woodland and veteran trees-link to standing advice

Biodiversity net gain

Under section 40 of the Natural Environment and Rural Communities Act 2006 Local Planning Authorities are required to conserve and enhance biodiversity. The NPPF section 170 states "Planning policies and decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity...". Suitable methods for calculating biodiversity net gain can include the Defra biodiversity offsetting metric¹³ and the environment bank biodiversity impact calculator¹⁴. Natural England would expect a policy within the Neighbourhood Plan to include wording to ensure that net biodiversity gain is achieved.

¹⁰ <http://www.environmentbank.com/mpacd-calculator.php>, and
¹¹ http://www.google.co.uk/url?sa=i&rct=j&q=&esrc=s&source=web&cd=3&ved=0ahjKEwT7yobQeQAQIMDCAK-Hb8IDUcFoortMAJ5url=http%3A%2F%2Fconsult.wat.gov.uk%2Ffiles%2F6184236&usq=AFOICNPBvJUJL_UND044Qe5mjl_mvgg

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 170. For more information, see our publication [Agricultural Land Classification: protecting the best and most versatile agricultural land](#)¹⁵.

Green Infrastructure, Improving Your Natural Environment.

Inclusion of Green Infrastructure (GI) in to development plans can provide multifunctional benefits to the area. These can include opportunities for recreation, health and wellbeing and access to nature as well as providing connected habitats for wildlife.

Your plan or order can offer exciting opportunities to enhance your local environment through inclusion of GI. If you are setting out policies on new development or proposing sites for development, you may wish to consider identifying what environmental features you want to be retained, connected, enhanced or new features you would like to see created as part of any new development. Examples might include:

- Providing a new footpath with landscaping through the new development to link into existing rights of way or other green spaces.
- Restoring a neglected hedgerow or creating new ones.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Considering how lighting can be best managed to encourage wildlife.
- Adding a green roof or walls to new or existing buildings.

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

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision.
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance on this](#)¹⁶).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks, changing hedge cutting timings and frequency).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition or clearing away an eyesore).

¹⁵ <http://publications.naturalengland.org.uk/publication/35012>

¹⁶ <http://planningguidance.planningportal.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space/local-green-space-designation/>

Green Roofs

Natural England is supportive of the inclusion of living roofs in all appropriate development. Research indicates that the benefits of green roofs include reducing run-off and thereby the risk of surface water flooding; reducing the requirement for heating and air-conditioning; and providing habitat for wildlife.

We would advise your council that some living roofs, such as sedum matting, can have limited biodiversity value in terms of the range of species that grow on them and habitats they provide. Natural England would encourage you to consider the use of bespoke solutions based on the needs of the wildlife specific to the site and adjacent area. Please refer to <http://livingroofs.org/> for a range of innovative solutions.

Date: 30 July 2018
Our ref: 251793
Your ref: Bramley NDP – SEA Screening



Mr G Wilson
Principal Planning Officer (Policy)
Waverley Borough Council
The Burys
Godalming
Surrey GU7 1HR

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

T 0300 060 3900

BY EMAIL ONLY

Planningpolicy@waverley.gov.uk
Guy.Wilson@waverley.gov.uk

Dear Mr Wilson

Bramley Neighbourhood Development Plan – SEA Screening

Thank you for your consultation on the above dated and received by Natural England on 6th July 2018.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Screening Request: Strategic Environmental Assessment

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) are concerned, that there are unlikely to be significant environmental effects from the proposed plan.

Ancient woodland and veteran trees-link to standing advice

You should consider any impacts on ancient woodland and veteran trees in line with paragraph 118 of the NPPF. Natural England maintains the Ancient Woodland [Inventory](#) which can help identify ancient woodland. Natural England and the Forest Commission have produced [standing advice](#) for planning authorities in relation to ancient woodland and veteran trees. It should be taken into account by planning authorities when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland/veteran trees where they form part of a SSSI or in exceptional circumstances.

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 the proposals contained within the plan will not have significant effects on sensitive sites that Natural England has a statutory duty to protect.

We are not aware of significant populations of protected species which are likely to be affected by the policies / proposals within the plan. It remains the case, however, that the responsible authority should provide information supporting this screening decision, sufficient to assess whether protected species are likely to be affected.

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, before determining whether an SA/SEA is necessary.

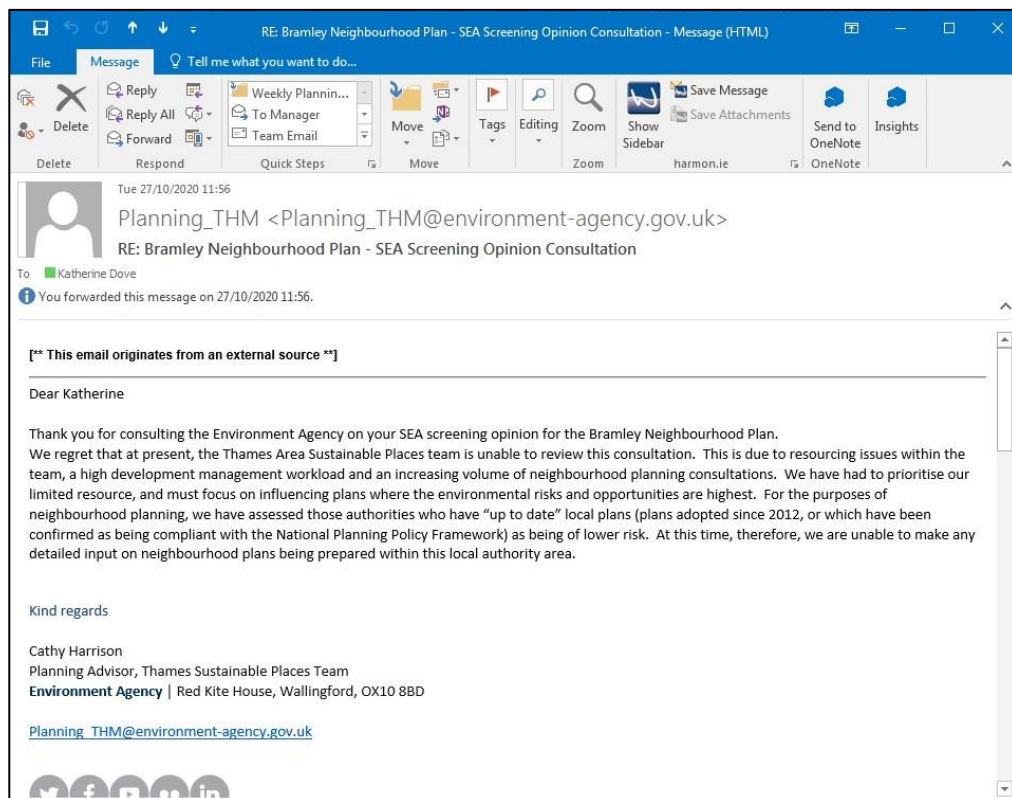
Please note that Natural England reserves the right to provide further comments on the environmental assessment of the plan beyond this SEA/SA screening stage, should the responsible authority seek our views on the scoping or environmental report stages. This includes any third party appeal against any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

For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

Sharon Jenkins
Consultations Team

Environment Agency's response:



Historic England's response:

From: Lloyd Sweet, Robert <Robert.LloydSweet@HistoricEngland.org.uk>
Sent: Thursday 24 December 2020 09:59
To: Alice Knowles <Alice.Knowles@waverley.gov.uk>
Subject: Re: Bramley Neighbourhood Plan - SEA Screening Opinion Consultation

[** This email originates from an external source **]

Dear Alice

Thank you for the reminder.

I'm happy to confirm that the additional information provided helps us to determine that the plan in its present form does not merit the preparation of an SEA for reasons of interest to Historic England.

I should point out that if the steering group do decide to use the Smithbrook Kilns reserve site when they come to review the plan, this would then, in our view bring about that need. This does not mean that we object to the site as an allocation, but that the potential effects for designated and non-designated heritage assets in proximity to it, would require an appropriate assessment including consideration of reasonable alternatives, and necessary mitigation of any harmful effects. If this is the only reason for undertaking SEA of the plan then it should only be as extensive an assessment as required to understand the significant effects considered likely (i.e. the effects of the site allocation and the reasonable alternatives to it that were considered in the planning process).

I hope this provides comfort to the steering group that this should not be an onerous task but would in effect provide a record of the appropriate assessment that has been undertaken in site selection and development of the allocation policy and an opportunity to cross-check it for potential conflicts with other plan policies or objectives.

Yours sincerely

Robert Lloyd-Sweet

Robert Lloyd-Sweet | Historic Places Adviser | South East England | Historic England
Cannon Bridge House | 25 Dowgate Hill | London | EC4R 2YA