

Effingham Neighbourhood Plan
Basic Conditions Statement
APPENDIX III

Responses to SEA and HRA Screening Report
from Statutory Consultees:

Historic England

Environment Agency

Natural England

Email from Historic England, 6 November 2015

This email was received after consultation with Historic England about the SEA Screening Report on the initial draft Neighbourhood Plan. The Pre-submission Neighbourhood Plan has taken these comments into account, except that the Village Design Statement is part of the Effingham Evidence Base and is no longer part of the Plan itself.

Thank you for consulting Historic England on the screening opinion for Strategic Environmental Assessment of the Effingham Neighbourhood Plan. In considering the opinion we have born the following considerations in mind:

That the plan allocates a number of sites for housing development to provide c. 60 units in total; That several of these sites are located within the Effingham Conservation Area or in an area that is likely to contribute to its setting;

That a total addition of 60 houses within a village conservation area or in its setting is not a small allocation and has the potential to have a significant impact on the significance and character of the area;

That an historic village centre such as Effingham is also likely to be a focus for archaeological remains of, at least local importance;

That the community have prepared a comprehensive parish design statement that forms an important element of the evidence base to the neighbourhood plan and gives particular consideration to the character and appearance of the conservation area;

That the plan includes general development control policies to ensure the design of new development sustains the character of the conservation area, including implementing the guidance of the design statement;

That the plan includes specific policies to protect key views and to ensure consideration is given to the conservation area and other heritage assets where relevant to individual site allocations;

Although the allocated sites have not been subject to formal Strategic Environmental Assessment, a rigorous and transparent process of site selection, including consideration of relevant environmental factors (including the impact on the conservation area, heritage assets and archaeological remains) has been conducted.

We see Strategic Environmental Assessment as an important element of the planning process that should not involve the collection of more evidence than is required in any case to prepare a robustly evidence Neighbourhood Plan and that both ensures the plan is in conformity with other higher level planning documents and is internally consistent. This adds to the robustness of the planning process and avoids challenge to the plan, whilst it may also be of assistance in ensuring the plan meets the basic conditions. We note that the assessment of sites and the preparation of objectives for the plan has followed a process that is analogous to SEA. Nevertheless, we are satisfied that, given the information presented and the objectives and policies of the emerging plan we do not feel that undertaking Strategic Environmental Assessment should be a requirement for the further development of the plan.

Nevertheless, we would request that the Parish Council ensures that the plan and site allocations in particular have been prepared with regard to the need to avoid or minimise harm through impacts on non-designated archaeological remains recorded on the County Council's Historic Environment Record, for which we could not see evidence in the draft plan documents, and that consideration is given to the impact of site allocations on the special historic or architectural interest of the conservation area. We would recommend that the latter would be facilitated by the addition of a short statement of significance to the Village Design Statement to identify the special interest that merits the area's designation. The District Council may be able

to help by providing records of any considerations recorded at the time of the area's designation or through the input of their experts' advice. To provide certainty that the plan is not open to challenge for having given sufficient regard to the desirability of conserving or enhancing the character or appearance of the conservation area we would recommend that the Village Design Statement is completed and adopted before the neighbourhood plan proceeds to submission consultation stage (Regulation 15). Notwithstanding the comments made through the examiner's health check we are supportive of Neighbourhood Plans that give weight to Village Design Statements that are recently and thoroughly prepared, particularly where these have been subjected to public consultation and approved by the Local Planning Authority. We would be happy to answer queries relating to Village Design Statements, assessment of impacts to archaeological remains, the assessment of significance of conservation areas or other matters where it can be of assistance to the Parish Council.

I hope these comments are of assistance to you and the Parish and District Councils.

Yours sincerely

Robert Lloyd-Sweet

Historic Places Advisor (South East England) Historic England Guildford

Email from Environment Agency, 9 November 2015

This email was received after consultation with the Environment Agency about the SEA Screening Report on the initial draft Neighbourhood Plan.

Thank you for your recent email about the Effingham Neighbourhood Plan. We apologise for the delay in replying, in particular that we did not meet your deadline of Friday 6 November. However, we agree with your determination that the plan is unlikely to result in significant environmental effects.

Kind regards,

Judith Johnson
Sustainable Places team

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

Email from Natural England , 7 February 2017

From: Steel, Amy (NE) [<mailto:Amy.Steel@naturalengland.org.uk>]
Sent: 07 February 2017 12:28
To: Dan Knowles
Subject: RE: Effingham Neighbourhood Plan HRA screening [UNC]

Dear Dan,

I have now had the opportunity to discuss this with Sophie and Marc and I have also read through the attached SEA/ HRA screening.

From this I can confirm that Natural England concurs with the HRA screening and have no further comments to make.

I hope this helps, however if you have any further queries please get back in touch.

Kind Regards,

Amy Steel
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Thames Team
Sustainable Development
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<https://www.gov.uk/natural-england>

We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.

In an effort to reduce Natural England's carbon footprint, I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing.

Natural England is accredited to the Cabinet Office Customer Services Excellence Standard.

From: Dan Knowles [<mailto:Dan.Knowles@guildford.gov.uk>]
Sent: 30 January 2017 12:04
To: Steel, Amy (NE)
Subject: Effingham Neighbourhood Plan HRA screening [UNC]

Dear Amy

Some time ago we commissioned an SEA and HRA screening for the emerging Effingham Neighbourhood Plan (see attached). Natural England concurred with the screening opinion and concluded that a full SEA was not required. The HRA screening was an appendix in the document, and our reading was that NE concurred with the conclusions within the whole document and therefore agreed that a full HRA was not required either. However, the examiner currently undertaking a health check of the plan has questioned whether NE explicitly agreed with the conclusions of the HRA screening.

I'd be very grateful if you could review the attached SEA/HRA screening and provide a response to state that NE concurs with the HRA screening opinion in the appendix. I will then use this to make the formal determination.

If you need any further info or I can be of any help, please let me know.

Best regards,

Dan Knowles
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