

Puttenham Neighbourhood Plan

Basic Conditions Statement



Puttenham Parish Council

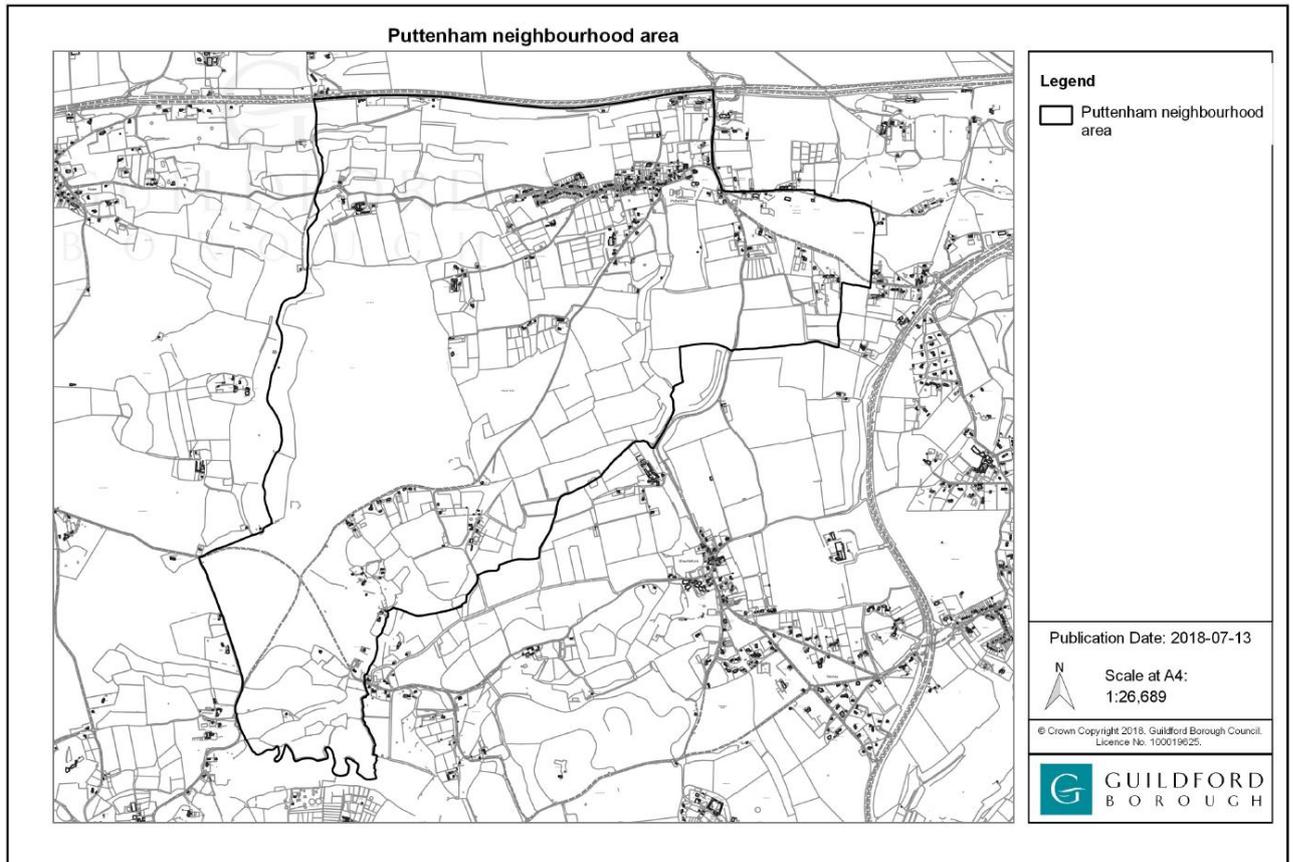
December 2019

1. Legal Requirements

1.1 This Statement has been prepared by Puttenham Parish Council to accompany its submission to the local planning authority Guildford Borough Council of the Puttenham Neighbourhood Development Plan (“the Neighbourhood Plan”) under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (“the Regulations”).

1.2 The Neighbourhood Plan has been prepared by a steering group on behalf of the parish council who are the qualifying body for the Neighbourhood Area which covers the entire parish, as designated by Guildford Borough Council on 03/12/2014.

Map of Neighbourhood Area



1.3 The policies described in the Neighbourhood Plan relate to the development and use of land in the designated Neighbourhood Area only. The plan period of the Neighbourhood Plan is from 2016 to 2033 and it does not contain policies relating to excluded development in accordance with the Regulations.

1.4 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 to the 1990 Town & Country Planning Act.

1.5 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.

2. Introduction and Background

2.1 Following the designation of the Neighbourhood Area by Guildford Borough Council in December 2014, Puttenham Parish Council appointed a Neighbourhood Plan Steering Group of parish councillors and residents to prepare a plan that would deliver the long-term goal of a balanced and vibrant neighbourhood, while maintaining the structure of the Village and the rural nature of the Parish.

2.2 The Group held its first meeting in June 2015. Since then, various consultation events and questionnaires have been undertaken to gather the views of local residents and other stakeholders including local businesses. The feedback gathered has helped shape this Neighbourhood Plan.

2.3 The Puttenham Neighbourhood Plan includes general land use policies which cover new development across the entire parish and also includes a small number of geographically specific which relate to particular sites. For the most part, the plan has deliberately avoided containing policies that may duplicate national and local policy.

3. Basic Conditions

3.1 As set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990, as applied by section 38A of the Planning and Compulsory Purchase Act 2004, Neighbourhood Plans are required to meet a set of basic conditions:

- having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the Neighbourhood Plan.
- the making of the Neighbourhood Plan contributes to the achievement of sustainable development.
- the making of the Neighbourhood 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 Plan does not breach, and is otherwise compatible with, EU obligations.

4. Conformity with National Planning Policy

4.1. The Neighbourhood Plan has been prepared with regard to national policies as set out in the National Planning Policy Framework (NPPF). The original NPPF was published in March 2012. It was replaced in July 2018 by a revised and updated version and was further updated in February 2019. Accordingly, this Basic Conditions Statement confirms that it is appropriate to make the Puttenham Neighbourhood Plan having regard to the policies of the 2019 Framework. It is also mindful of the National Planning Practice Guidance (NPPG) published by the Government in April 2014, and subsequently updated, in respect of formulating neighbourhood plans.

4.2 The NPPF sets a clear direction for development plans to contribute to the achievement of sustainable development as set out in section 2 of the NPPF. The Puttenham Neighbourhood Plan includes various policies relating to the parish's local economy, community and built and natural environment and seeks to plan positively to address the parish's development needs. The delivery of affordable homes for local residents is of primary importance in achieving this aim.

4.3 The NPPF sets out specific guidance for Neighbourhood Plans, including through paragraphs 28-30 which clarify that neighbourhood plans allows communities to set out detailed policies for specific areas through non-strategic policies. This can include allocating sites, the provision of infrastructure and community facilities at a local level, establishing design principles, conserving and enhancing the natural and historic environment and setting out other development management policies.

4.4 Set out in Table 1 below is a brief summary of how each policy conforms to the NPPF. The particular paragraphs referred to in the table are those considered the most relevant to each policy but are not intended to be an exhaustive list of all possible relevant paragraphs.

Table 1: Conformity of Neighbourhood Plan (NP) policies to the NPPF

Policy Number and Title	NPPF paragraph	Comment on conformity
P-GP1 – Puttenham Settlement Boundary and Development Principles	11, 68, 79, 117, 118, 133, 143, 144, 145, 170, 172	This policy seeks to steer new development to the most sustainable location in the parish within the existing Puttenham Settlement Boundary (para's 68, 79, 117 and 118 of the NPPF) and to exert controls over new development that falls outside of this boundary to ensure the protection of green belt land (NPPF para's 133, 143-145) and to conserve the parish's valued natural landscape (NPPF para 170), including the Surrey Hills AONB (NPPF para 172).
P-TI1 – Sustainable Transport	102, 104, 110	This policy requires new development to support sustainable forms of transport, including new footways and cycleways. This aligns with para's 102 and 104 of the NPPF.
P-TI2 - Parking	102, 105	This policy seeks to resist the loss of existing parking and align with Surrey County Council parking standards with regard to new provision. Given the parking pressures in the village (as described in detail in the Transport Report), these are set as minimum standards to ensure that appropriate levels of parking is incorporated into new development proposals from the outset. Given the high level of car ownership poor public transport links, this is

		considered to be of importance and in line with para 105 of the NPPF.
P-TI3 – Car Park Policy	108, 110, 143-146, 170	Whilst it is acknowledged that this policy does not necessarily discourage the use of private transportation, the need for formalising this existing car park has been justified in the Transport Report which outlines the village’s parking pressures. It is also noted that the policy supports EvC provision and an appropriately designed scheme to ensure the formalisation of the car park is not detrimental to the local environment.
P-TI4 – Electric Vehicle Charging Points	105, 110	This policy supports the provision of EvC points in new development which accords with para 105 of the NPPF
P-TI5 – Communications Infrastructure	112, 113	This policy supports high quality, fast telecommunications infrastructure, in line with para’s 112 and 113 of the NPPF.
P-TI6 – Water and Waste Infrastructure	20	This policy will ensure new development is served by adequate water and waste infrastructure in line with para 20 of the NPPF
P-TI7 – Water Efficiency	149	This policy will ensure that new development responds to the challenge of climate change by ensuring new development is water efficient.
P-HP1 – Affordable Housing	11, 68, 69, 71, 77-79	The Neighbourhood Plan seeks to plan positively to meet local affordable housing needs in particular through affordable homes/rural exception sites in appropriate locations in accordance with para 11, 68, 69 and 77 of the NPPF,
P-HA1 – Home Farm Barns	11, 69, 71, 77-79, 145	The site lies within the green belt but also within the defined village settlement boundary. The re-use of this brownfield site is therefore in accordance with para 145 of the NPPF which clarifies that limited affordable housing for local community needs is one of the exceptions to green belt policy as well as para’s 117 and 118 which support the re-use of previously developed land.
P-HA2 – Corner of Lees Field, Seale Lane	11, 69, 71, 77-79, 145	The site lies within the green belt and on the edge of the village settlement boundary. Its allocation for a rural exception affordable housing site is therefore in accordance with para 78 (which supports rural housing where it will enhance and maintain existing settlements) and 145 of the NPPF which clarifies that limited affordable housing for local community needs is one of the exceptions to green belt policy.
P-NE1 – Natural Environment	170, 172	The protection of the parish’s valued natural environment (and its location in the Surrey Hill AONB) is an important aspect of this plan and this policy is in accordance with para 170 and 172 of the NPPF
P-NE2 – Dark Night Skies	170	The parish’s dark night skies are an important and valued characteristic of the parish’s local environment. This policy aims to minimise light pollution and protect this characteristic.
P-NE3 – Trees and Hedgerows	170	The parish’s trees and hedgerows are an important and valued characteristic of the parish’s local environment. This policy adds to protection to those trees and

		hedgerows of special significance and supports replacement planting which accords with policy 170 of the NPPF
P-NE4 - Biodiversity	170	This policy seeks to protect and enhance the parish's biodiversity assets, and provide ecological enhancements where possible, in accordance para 170 of the NPPF.
P-BE1 - Design	124-127	Para 125 of the NPPG recognises that Neighbourhood Plans are best placed to express an area's defining characteristics through consultation with the local community and this policy seeks to ensure new development is of a high-quality design and respects the local character.
P-BE2 – Backland and Infill Development	125-127	This policy seeks to ensure that new backland and infill development is in keeping and avoids harm to the character of the area. The NPPG recognises that the design of new development should respond to the defined local character of an area and align with the aspirations of a local community who are best placed to identify such characteristics through a Neighbourhood Plan.
P-BE3 – Sustainable Development	131, 150	The policy also supports modern and sustainable methods of construction which aligns with para 131 and 150 of the NPPF.
P-BE4 – Puttenham Conservation Area	189-202	This policy seeks to ensure that new development preserves and enhances the Puttenham Conservation Area in accordance with para's 189-202 of the NPPF
P-BE5 – Listed Buildings	189-202	This policy seeks to ensure that new development preserves and enhances the parish's Listed Buildings in accordance with para's 189-202 of the NPPF
P-BE6 – Buildings of Local Merit	184-185, 189-192, 197	This policy seeks to ensure that new development preserves and enhances the parish's listed buildings in accordance with para's 197 of the NPPF in particular
P-RP1 – Existing Community Facilities	83, 92, 97	This policy seeks the retention of existing community facilities which aligns with para 83 and 92 of the NPPF
P-RP2 – Sports and Recreation Facilities	97	This policy supports the provision of new and enhanced sport and recreation facilities in accordance with para 97 of the NPPF
P-RP3 - Allotments	91, 92	This policy supports the provision of new allotments in accordance with para 91

4. General conformity with the strategic Policies of the development plan

4.1 The Neighbourhood Plan has been prepared to ensure its general conformity with the development plan for Guildford Borough which is the Guildford Local Plan Strategy and Sites (2019), Surrey Waste and Minerals Plan as well as the saved policies of the 2003 Local Plan and the South East Plan.

4.3 Table 2 below sets out how each policy is in general conformity with the Guildford Borough Development Plan.

Policy Number and Title	Development Plan Policy	Comment on conformity
P-GP1 – Puttenham Settlement Boundary and Development Principles	S1, S2, P1, P2, P3	This policy is in line with S1 of the Local Plan which supports sustainable development. Policy S2 of the Local Plan sets the housing requirement for the Borough. Whilst this policy does not identify a housing target for the parish, it recognises that windfall and rural exception sites will come forward in those areas not allocated a housing requirement. This policy is in general conformity with Policy S2 as it supports sustainable development within the Puttenham Settlement Boundary and sets requirements for proposals located outside of the settlement boundary. Also, by replicating national and local policy, this policy also ensures general conformity with policies P1 (AONB) and P2 (Green Belt) of the Local Plan.
P-TI1 – Sustainable Transport	ID3, D1	This policy supports sustainable forms of transport which aligns with policy ID3 and D1 of the Local Plan
P-TI2 - Parking	ID3	Policy ID3 does not specify parking requirements for new development but Guildford BC do currently apply Surrey County Council's adopted parking standards. Policy ID3 relates to the loss of parking by restricting development that would have an adverse impact on road safety or the movement of other road users. Justified by evidence set out in the supporting text and in the Transport Report, Policy P-TI2 sets locally specific parking requirements for new developments and sets slightly tighter controls on new and existing parking but is in general conformity with this policy.
P-TI3 – Car Park Policy	ID3, ID4, P1, P2	As above. This policy also includes various criteria to ensure that, if implemented, the car park responds appropriately to its rural setting and provides ecological enhancements.
P-TI4 – Electric Vehicle Charging Points	ID3	This policy supports the provision of electric vehicle charging infrastructure which is in general conformity with policy ID3 of the Local Plan which encourages sustainable travel choice which, as stated in the justification, includes electric vehicle infrastructure. Furthermore, Guildford BC currently apply Surrey County Council's adopted parking standards which includes

		requirements for EvC provision which policy P-TI4 aligns with.
P-TI5 – Communications Infrastructure	ID1, E5	This policy supports high quality, fast telecommunications infrastructure which is essential for new and existing residents and the functioning of the parish's rural economy. The policy is in general conformity with ID1 and E5 of the Local Plan.
P-TI6 – Water and Waste Infrastructure	ID1	This policy will ensure new development is served by adequate water and waste infrastructure in general conformity with ID1 of the Local Plan.
P-TI7 – Water Efficiency	D2	This policy will ensure that new development responds to the challenge of climate change by achieving water efficiency targets which align with the requirements of policy D2 which seeks to achieve current highest national standards for water efficiency set in Building Regulations.
P-HP1 – Affordable Housing	S2, H2	<p>Policy S2 of the Local Plan sets the housing requirement for the Borough. Whilst this policy does not identify a housing target for the parish, it recognises that windfall and rural exception sites will come forward in those areas not allocated a housing requirement.</p> <p>Policy H2 of the Local Plan aims to meet the Borough's identified affordable housing needs.</p> <p>Policy P-HP1 seeks to ensure that Puttenham parish plays its part in realising this aim (set in policy H2) and meets its own local affordable housing need. It is therefore in general conformity but builds on these policies by stipulating a requirement that the affordable homes will remain low-cost in perpetuity and will be secured for households with a local connection as defined in the Puttenham and Wanborough Housing Society Scheme of Allocation.</p> <p>The policy also requires an appropriate size and tenure taking into account the latest affordable housing evidence (including Borough and parish housing need evidence) in general conformity with policy H2.</p>
P-HA1 – Home Farm Barns	P2, ID4, P5, H2	<p>Policy H2 of the Local Plan aims to meet the Borough's identified affordable housing needs.</p> <p>This site is within the village settlement boundary and would be considered infill development in accordance with the green belt policy criteria set in P2 of the Local Plan. This policy is also in accordance with ID4 and P5 of the Local Plan as it clarifies that SANGS/SAMM must be provided.</p>
P-HA2 – Corner of Lees Field, Seale Lane	ID4, P5, H2	<p>Policy H2 of the Local Plan aims to meet the Borough's identified affordable housing needs.</p> <p>This policy is also in accordance with ID4 and P5 of the Local Plan as it clarifies that SANG/SAMM must be provided.</p>
P-NE1 – Natural Environment	P1, D1	This policy seeks to preserve and enhance the parish's valued natural environment (in particular with regard to its location in the Surrey Hill AONB) and local character

		(including landscape setting). The policy is therefore in accordance with P1 and D1.
P-NE2 – Dark Night Skies	P1, D1	Dark night skies make an important contribution to the parish’s local character as well as the wider Surrey Hills AONB, as set out in the Management Plan. The policy is therefore in accordance with policies P1 and D1 of the Local Plan.
P-NE3 – Trees and Hedgerows	ID4, D1	This policy seeks to protect the parish’s trees and hedgerows which are an important and valued characteristic of the parish’s local environment. The Local Plan does not have a strong policy basis for the protection of these natural assets but this policy is in general conformity with policies ID4 and D1.
P-NE4 - Biodiversity	ID4	This policy seeks to protect and enhance the parish’s biodiversity assets, including Biodiversity Opportunity Areas, and provide ecological enhancements where possible. On this basis, it is in accordance with ID4 of the Local Plan.
P-BE1 - Design	D1	This policy seeks to ensure new development is of a high quality design and respects the local character which is in general conformity with (but adds further detail to) policy D1 of the Local Plan.
P-BE2 – Backland and Infill Development	D1, P2	This policy seeks to ensure that new backland and infill development is in keeping and avoids harm to the character of the area which is in accordance with policy D1 of the Local Plan which seeks to reinforce locally distinct patterns of development. By not being overly restrictive, it is also in accordance with policy P2 in relation to limited infill development.
P-BE3 – Sustainable Development	D1, D2	This policy supports zero carbon development and encourages reductions in CO2 emissions and renewable technology in general conformity with Policy D2 of the Local Plan. In some cases, Policy D2 sets specific targets, however, this policy is in general conformity with D2. It is also in accordance with Policy D1 which supports the efficient use of natural resources.
P-BE4 – Puttenham Conservation Area	D3, HE2, HE4 and HE7 of the 2003 Local Plan	This policy is in general conformity with policy D3 of the Local Plan which simply cross-references with national policy on heritage assets. This policy adds further local details to national / local policy through reference to the Puttenham Conservation Area Appraisal and also to key features that often form an important part of an asset’s setting (for example trees and woodland). The policy is also in conformity with the saved policies of the 2003 Local Plan.
P-BE5 – Listed Buildings	D3, HE2, HE4 and HE7 of the 2003 Local Plan	This policy is in general conformity with policy D3 of the Local Plan which simply cross-references with national policy on heritage assets. The policy is also in conformity with the saved policies of the 2003 Local Plan.

P-BE6 – Buildings of Local Merit	D3, HE2, HE4 and HE7 of the 2003 Local Plan	This policy is in general conformity with policy D3 of the Local Plan which simply cross-references with national policy on heritage assets. Policy P-BE6 specifically relates to Buildings of Local Merit of which there are a number of within the village and wider parish and or of value to local residents in terms of the contribution they make to the character of the village and parish. This theme has been made apparent through consultation on the Neighbourhood Plan and so having a specific policy relating to the protection of these assets (including a presumption against their demolition) is considered to be a clear and justified local response which is in general conformity with this strategic policy. The policy is also in conformity with the saved policies of the 2003 Local Plan.
P-RP1 – Existing Community Facilities	ID4	This policy seeks to retain existing community services which are of value to the local community. This aligns with policy ID4 of the Local Plan. The policy adds further detail and flexibility to this strategic policy by identifying instances where the loss of a facility may be found acceptable.
P-RP2 – Sports and Recreation Facilities	ID1	This policy supports the provision of new sport and recreation facilities. This policy also identifies a particular site for this purpose. The policy is therefore in general conformity with (and builds upon) policy ID1 of the Local Plan.
P-RP3 - Allotments	ID1	Policy P-RP3 supports the provision of new allotments which is in general conformity with (and builds on) ID1 of the Local Plan which seeks to ensure new development is supported by necessary infrastructure.

5. Contribution to Achieving Sustainable Development

5.1 A Sustainability Appraisal has not been undertaken as this is not a requirement for a Neighbourhood Plan. However, the Neighbourhood Plan has taken account of the need to contribute to the achievement of sustainable development.

5.2 The strategic objectives of the Neighbourhood Plan promote sustainable development.

5.3 Table 3 below has assessed our plan’s policies in terms of how it will deliver sustainable development in the economic, social and environmental aspects of sustainability.



Policy Number and Title	Eco	Soc	Env	
P-GP1 – Puttenham Settlement Boundary and Development Principles				This policy is likely to have a small positive impact on social and economic objectives as it supports the delivery of new homes (and potentially other forms of development) to meet local needs. Its focus is to direct new development within the Settlement Boundary of Puttenham which is the parish’s most sustainable settlement and which will foster social cohesion and interaction. The policy aims to restrict development outside of the settlement boundary unless certain criteria are met which should limit any environmental harm.
P-TI1 – Sustainable Transport				This policy requires new development to support sustainable forms of transport, including new footways and cycleways which should have a small positive impact in environmental terms albeit it is acknowledged that the parish population is heavily dependent on private transportation and the level of new development is likely to be limited. It will also have a small positive impact on social objectives as it seeks to achieve greater accessibility to local services. There may be some benefits to local businesses but not significantly so.
P-TI2 - Parking				Ensuring that new development is supported by the specified levels of parking (and resisting the loss of parking) would not have a positive impact on environmental objectives, however, given the likely scale of development this is unlikely to be negative. This policy is likely to support the local community as parking pressure is a major concern for

				local residents. However, overall, this policy is likely to have a neutral impact against social, environmental and economic objectives.
P-TI3 – Car Park Policy				Formalising the existing car park would not have a positive impact on environmental objectives, however, the policy criteria will ensure that EvC infrastructure is provided and that the design of the car park (in terms of surfacing and landscaping) is appropriate to its rural setting. A neutral impact is therefore expected. Parking is a major concern for local residents and so a new village car park is likely to have a positive impact in terms of supporting the local community.
P-TI4 – Electric Vehicle Charging Points				This policy supports the provision of EvC points in new development which is a sustainable form of transport. A positive environmental impact is therefore expected albeit this is unlikely to be significant given the likely scale of development. This may constitute a financial burden for new developments and local businesses but not significantly so.
P-TI5 – Communications Infrastructure				This policy will ensure new development is supported by high quality, fast telecommunications infrastructure which will provide a valuable service to future residents and local businesses in particular. The policy wording should ensure a harmful environmental impact is avoided.
P-TI6 – Water and Waste Infrastructure				This policy will ensure new residential development is served by adequate water and waste infrastructure which is a vital for the local community.
P-TI7 – Water Efficiency				This policy will ensure that new development responds to the challenge of climate change in terms of water efficiency. A very positive environmental impact is expected.
P-HP1 – Affordable Housing				The parish has a local affordable housing need and significant affordability pressures. This policy supports the provision of affordable homes for people with a local connection to the parish. The policy also requires an appropriate size and tenure taking into account the latest

				affordable housing evidence (including borough and parish housing need evidence). On this basis, the policy will have a significant social and economic benefits even if the possibility of development on greenfield land (in particular outside of the settlement boundary) will have an environmental impact.
P-HA1 – Home Farm Barns				This policy will have social and economic benefits as well as environmental benefits as affordable housing is being met on a brownfield site which will likely bring about improvements to the existing site (and the existing building itself subject to safeguards in the policy to ensure that any works to the listed building avoid harm to its significance) as well as reducing pressures on undeveloped land in meeting local affordable need.
P-HA2 – Corner of Lees Field, Seale Lane				This policy will have social and economic benefits. The site will result in the loss of greenfield land within the Surrey Hills AONB. However, given the scale of the site as well as the safeguards included in the policy wording to ensure that the development is sensitive to its location with an appropriate landscaping scheme, this is not considered to result in an adverse impact.
P-NE1 – Natural Environment				This policy seeks the protection of the parish's valued natural environment (and its location in the Surrey Hill AONB) and ensures that future development proposals are supported by information to demonstrate they have been sensitively designed and, ultimately, minimise their impact on the natural environment. It will therefore have a positive environmental impact.
P-NE2 – Dark Night Skies				The parish's dark night skies are an important and valued characteristic of the parish's local environment. This policy aims to minimise light pollution and protect this characteristic and so will have a positive environmental impact.
P-NE3 – Trees and Hedgerows				The parish's trees and hedgerows are an important and valued characteristic of the parish's local environment. This policy adds to protection to those trees

				and hedgerows of special significance and supports replacement planting which and so will have a positive environmental impact.
P-NE4 - Biodiversity				This policy seeks to protect and enhance the parish's biodiversity assets, and provide ecological enhancements where possible, and so will have a positive environmental impact.
P-BE1 - Design				This policy seeks to ensure new development is of a high quality design and respects the local character which will have a positive environmental impact.
P-BE2 – Backland and Infill Development				This policy seeks to ensure that new backland and infill development is in keeping and avoids harm to the character of the area. The policy is not overly restrictive and supports new development where certain criteria are met ensuring there is no adverse impact on local character whilst also reducing the pressure for development on greenfield land by supporting the parish's development needs to be met within the settlement boundary of the village. The policy will have a positive social impact as there are various criteria which will ensure an adverse impact on local residents is avoided.
P-BE3 – Sustainable Development				The policy supports sustainable developments and so will have a positive environmental impact. This will have financial implications which may impact on the viability of development but this is not likely to have a significant economic impact.
P-BE4 – Puttenham Conservation Area				This policy seeks to ensure that new development preserves and enhances the Puttenham Conservation Area and so will have a positive environmental impact.
P-BE5 – Listed Buildings				This policy seeks to ensure that new development preserves and enhances the parish's Listed Buildings and so will have a positive environmental impact.
P-BE6 – Buildings of Local Merit				This policy seeks to ensure that new development preserves and enhances the parish's Buildings of Local Merit and

				so will have a positive environmental impact.
P-RP1 – Existing Community Facilities				This policy seeks the retention of existing community facilities which are valued and essential to the wellbeing of the local community
P-RP2 – Sports and Recreation Facilities				This policy supports the provision of new and enhanced sport and recreation facilities which will have a positive social impact. New development, depending on its location and design, could have an environmental impact, however this policy cross references other Neighbourhood Plan policies which seek to ensure an adverse impact is avoided.
P-RP3 - Allotments				This policy supports the provision of new allotments which are important community facilities and so will have a positive social impact. Allotments, similar to other forms of development, can have an environmental impact however this is not considered to result in an adverse impact.

6. Compatibility with EU Obligations and legislation

6.1 The Neighbourhood Plan has regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights and complies with the Human Rights Act.

Strategic Environmental Assessment

Neighbourhood Plans are also required to demonstrate that they are legally compliant and are compatible with EU obligations (as incorporated into UK law). An important component of this is compliance with the Strategic Environmental Assessment Directive (transposed into English Law through the Strategic Environmental Assessment (SEA) Regulations¹) by considering whether there are likely to be any significant environmental effects as a result of implementing the plan. A Strategic Environmental Assessment is not a legal requirement, however, Local Planning Authorities are required to consider whether Neighbourhood Plans are likely to have significant environmental effects, a process known as screening.

As such, a screening opinion was sought from Guildford Borough Council. The Screening Report assesses the plan's policies against the criteria set out in the SEA Directive. This Screening Report confirms that the Puttenham Neighbourhood Plan is unlikely to have significant environmental effects and, as such, a full Strategic Environmental Assessment is not required to meet the requirements of the SEA Directive.

¹ Environmental Assessment of Plans and Programmes Regulations 2004

The SEA acknowledges that the plan allocates land for a small-scale development but that it sets out a framework for the consideration of a range of matters at the local level that due to their small size, nature and location will not cause rise to significant environmental effects. The screening assessment also acknowledges the following:

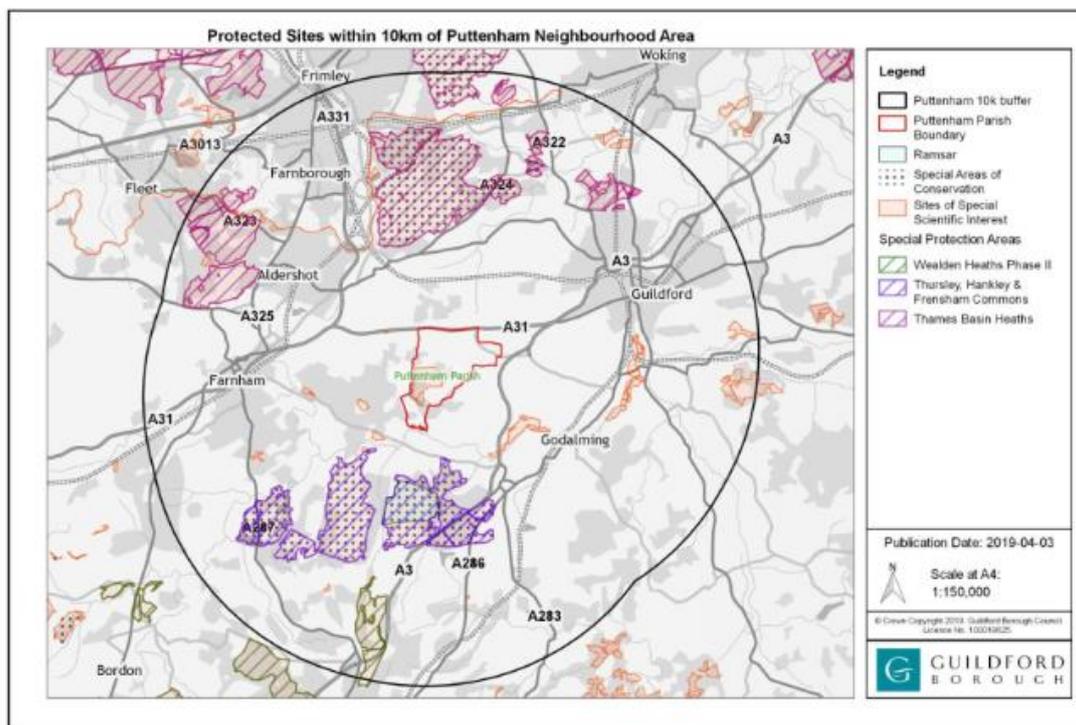
- That the integration of environmental considerations and promotion of sustainable development is central to the specific objectives and policies
- The Plan seeks to promote sustainable development overall and does not seek any relaxations to sustainable development principles set out in higher-level plans.
- The Puttenham Neighbourhood Plan includes specific policies relating to the protection of the natural environment.

Since the issuing of the SEA screening report by Guildford Borough Council, amendments have been made to the Draft Neighbourhood Plan in line with comments from consultees and residents received at the Regulation 14 consultation. This has included the removal of two of the rural exception sites (previously sites HA2 and HA3). No new sites have been added. Policy HP1 has been expanded to show general support for further affordable housing developments that might come forward outside of the Neighbourhood Plan process in the future. Some new policies have been added, as advised by various consultees, including a new policy P-HP2 has also been added which requires new developments to make appropriate SANG provision and/or SAMM contributions as advised by GBC. These changes are not considered to change the outcome of the SEA screening report.

Habitat Regulations Assessment

Puttenham parish is within the vicinity of three European protected sites which are designated as Special Protection Areas (SPAs):

- Thursley, Hankley and Frensham Commons (Weladen Heaths Phase 1)
- Thames Basin Heaths
- Wealden Heaths Phase 2



Further detail on these sites is set out in the Environment Report accompanying the Neighbourhood Plan but the map above shows the proximity of these sites.

The Thames Basin Heaths SPA which is an area of heathland identified as an important habitat for three rare species of bird – the Dartford Warbler, Woodlark and Nightjar. This area is designated under European legislation as a Special Protection Area (SPA) and Special Area of Conservation Area (SAC).

The SPA/SAC is protected by a 5km zone within which new development is restricted. The upper half of the parish lies within the 5km zone which includes the entire village of Puttenham. The remainder of the parish lies within the 5-7km buffer zone.

Given the location of the parish, and as the Puttenham Neighbourhood Plan identifies sites for affordable homes (which are not exempt from the restrictions referred to above), the plan has the potential to affect the ecological integrity of the Thames Basin Heaths Special Protection Area. As such, Guildford Borough Council published a screening opinion (April 2019) for the Neighbourhood Plan which concludes that some of the policies (HP1 and HA1-HA4²) within the Neighbourhood Plan are likely to have significant effects on European protected sites due to increased recreational pressure from new development. As such, an Appropriate Assessment was undertaken in line with EU Habitat Regulations to more accurately determine whether the Plan would have an adverse impact and to assess avoidance and mitigation measures.

The Appropriate Assessment concluded that, through avoidance and mitigation measures set out in Guildford Borough Council's Thames Basin Heaths SPA Avoidance Strategy and as incorporated into policies P-HA1, P-HA2 and new policy P-HP2 of the Puttenham Neighbourhood Plan (SANG and SAMM), GBC determined that there will be no adverse effects on the integrity of the SPA as a result of the making of the Neighbourhood Plan.

Ultimately the Screening Opinion concludes that the Puttenham Neighbourhood Plan is compatible with European obligations.

Since the issuing of the HRA Screening Report/Appropriate Assessment by Guildford Borough Council, amendments have been made to the Draft Neighbourhood Plan in line with comments from consultees and residents received at the Regulation 14 consultation. This has included the removal of two of the rural exception sites (previously sites HA2 and HA3). No new sites have been added. Policy HP1 has been expanded to show general support for further affordable housing developments that might come forward outside of the Neighbourhood Plan process in the future. A new policy P-HP2 has also been added which requires new developments to make appropriate SANG provision and/or SAMM contributions, as advised by GBC, which is considered sufficient to mitigate any potential effects on the Thames Basin Heaths SPA. No other changes are deemed to affect the outcome of the HRA screening and Appropriate Assessment.

On this basis, it is considered that the Puttenham Neighbourhood Plan is compatible with European obligations.

Conclusion

It is concluded that the Puttenham Neighbourhood Plan meets the Basic Conditions.

² Note – site allocations HA2 and HA3 have since been removed from the Neighbourhood Plan.