

Strategic Environmental Assessment (SEA) for the Alton Neighbourhood Plan 2021-41

Environmental Report

August 2024

Quality information

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Non-technical summary

AECOM is commissioned to lead on Strategic Environmental Assessment (SEA) in support of the emerging Alton Neighbourhood Plan 2021-41.

The Neighbourhood Plan is being prepared by Alton Town Council in the context of the emerging East Hampshire Local Plan. Once 'made' the Neighbourhood Plan will supersede the current Alton Neighbourhood Plan 2011-28 and will have material weight when deciding on planning applications, alongside the Local Plan.

SEA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating negative effects and maximising the positives. Central to the SEA process is publication of an Environmental Report alongside the Draft Plan that presents certain required information. The aim is to inform the consultation and, in turn, plan finalisation.

Preparing the Environmental Report involves answering three questions:

1) What has plan-making / SEA involved **up to this point?**

- including in relation to 'reasonable alternatives'.

2) What are the SEA findings **at this stage?**

- i.e. in relation to the Draft Plan.

3) What happens **next**

This Environmental Report / NTS

This is the Non-Technical Summary (NTS) of the Environmental Report.

Both this NTS and the main report are structured so as to answer the three questions introduced above in turn. Firstly, there is a need to set the scene by answering: *What's the scope of the SEA?*

What is the scope of the SEA?

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

- Air quality
- Biodiversity
- Climate change
- Communities
- Historic environment
- Landscape
- Land, soil, and water resources
- Population and communities
- Transportation and movement

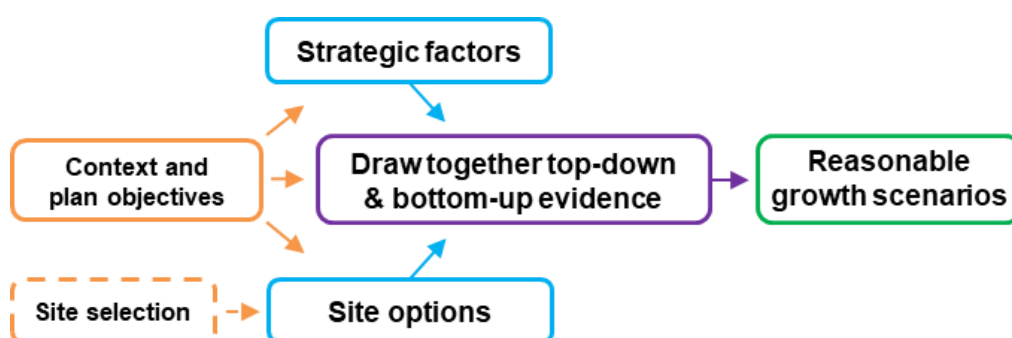
Plan making/SEA up to this point

An important element of the required SEA process involves assessing **reasonable alternatives** in time to inform development of the Draft Plan, and then publishing assessment findings in the Environmental Report.

As such, Part 1 of this report explains how work was undertaken to develop and assess a 'reasonable' range of alternative approaches to allocating development sites in order to meet the housing requirement assigned by the emerging Local Plan. The decision was made to refer to these alternatives as **growth scenarios**.

The process of defining growth scenarios is set out in Section 5 of this report and is summarised in a flow diagram.

Defining growth scenarios



In summary:

The Draft East Hampshire Local Plan directs 1,700 homes to Alton, over-and-above completions (since the start of the plan period) and existing commitments (sites with planning permission). The Local Plan also proposes three small / medium-sized allocations for a total of 264 homes and a 1,000 home strategic allocation at Neatham Down, to the east of Alton. This leads to a 436 homes residual requirement for the Alton Neighbourhood Plan.

A site selection process was undertaken by the Town Council, working with consultants ONH, which identified: A) 101 homes supply from permitted sites in the urban area; and B) three strongly performing greenfield sites for 398 homes in total. Together these sites deliver 499 homes, thereby meeting and buffering the 436 home residual requirement. This is **Growth Scenario 1**.

However, there is also a need to test a scenario whereby the Local Plan does not allocate Neatham Down (albeit the decision on whether or not to allocate is outside the remit of the Neighbourhood Plan, including as the site falls outside of the plan area). That is because of concerns regarding the site and because a strategy involving the three greenfield neighbourhood plan allocations discussed above risks piecemeal expansion of Alton, with opportunities missed to deliver comprehensive infrastructure-led growth.

Without Neatham Down the residual figure to be provided for through the Neighbourhood Plan increases to 1,436 homes. Under this scenario, in addition to the three allocations that feature under Scenario 1, the proposal is to allocate a comprehensive urban extension to the south of Alton for ~900 homes. This would mean providing for $499 + 900 = 1,399$ homes, i.e. figure approaching the 1,436 home requirement. This is **Growth Scenario 2**.

The reasonable alternative growth scenarios (with constants greyed-out)

Supply component		Growth scenario 1	Growth scenario 2
Local Plan allocation	Travis Perkins	24	24
	Whitedown Lane	90	90
	Brick Kiln Lane	150	150
	Neatham Down	-	1,000
Additional brownfield supply from permitted sites		101	101
Neighbourhood Plan allocation	Expanded Brick Kiln Lane	75	75
	Land at Weysprings	100	100
	Holybourne	223	223
	South Alton	900	-
Total homes		1,663	1,763

The table below presents the assessment findings. Within each row (i.e. for each of the topics that comprise the SEA framework) the columns to the right hand side:

- Rank the scenarios in order of preference where a rank of 1 indicates the preferable scenario (and with a gold star used as a visual aid), an equals sign (=) used where there scenarios cannot be differentiated with any confidence; and a question mark (?) used where there is insufficient evidence to make a judgement.
- Predict significant effects using red-amber-green (RAG) shading.¹

The most significant conclusion is reached under 'transport', with support for a comprehensive urban extension to the south of the town and concern regarding expansion of the town to the east of the A31 (Neatham Down). A southern expansion would better support walking and cycling, and deliver valuable new transport infrastructure, whilst Neatham Down would risk being car dependent, and it is not clear that there is any particular bus connectivity opportunity.

The next key topic for consideration is 'landscape'. Under this heading it is fair to conclude a preference for Neatham Down, because land to the south of Alton is near adjacent to the South Downs National Park. Also, this open raised land is crossed by public rights of way and valued by residents of Alton, and the effect of growth here will be to expand the town beyond the confines of the River Wey valley. However, it is not clear that the nearby land comprises a particularly sensitive part of the National Park and a southern Alton urban extension would be fully contained by the A31, such that there would be no risk of future development creep / sprawl.

¹ **Red** indicates a significant negative effect; **amber** a negative effect of limited or uncertain significance; **light green** a positive effect of limited or uncertain significance; and **green** a significant positive effect. No colour indicates a neutral effect.

In contrast, there is a concern regarding development creep at Neatham Down (albeit Copt Hill to the north, Neatham Down to the south and woodlands to the east would provide containment), and this is an attractive rolling landscape.

Also, in respect of both transport and landscape, there is a need to consider that failure to support a comprehensive development at South Alton would risk the land coming forward in a piecemeal way over time, with opportunities missed including in terms of strategic planning for transport and green infrastructure.

The appraisal also flags two other issues, namely A) climate change; and B) biodiversity. In respect of (A), there is a need to consider which of the two sites / schemes (Neatham Down vs South Alton) would be better suited to delivering net zero carbon development to an exacting standard, recognising that this has major cost implications such that, in practice, it could transpire that there is a need to compromise on decarbonisation objectives in order to deliver on wider objectives such as infrastructure delivery and affordable housing. In respect of (B), there are no major concerns with either site, but it is appropriate to flag Neatham Down's location adjacent to Monks Wood, which is a fairly larger ancient woodland.

Finally, both growth scenarios are supported in terms of 'communities' objectives because a proactive approach would be taken to providing for housing needs and also ensuring that new community infrastructure is delivered alongside new homes. Scenario 2 could deliver more homes, but there is a concern that the development would be isolated from Alton and funding would be diverted to 'grey' infrastructure.

Growth scenarios assessment findings

Topic	Scenario 1 Constants + South Alton	Scenario 2 Constants + Neatham Down
Air quality	=	=
Biodiversity	1	2
Climate change	?	?
Communities	=	=
Historic env	=	=
Landscape	2	1
Land, soil, water	=	=
Transport	1	2

The Town Council's planning consultant responded to the growth scenarios assessment as follows (N.B. the following text does not comprise an assessment):

“Scenario 1 is supported on balance, in light of the assessment. There is a strong preference for delivering a comprehensive urban extension, to include strategic planning for transport and green infrastructure. This urban extension should link into the settlement edge as effectively as possible, in order to minimise infrastructure requirements and costs, thereby ensuring funding is available to direct towards the achievement of wider objectives. Landscape concerns with South Alton are acknowledged, but land to the south of Alton relates much better to the town than Neatham Down, and even if it were not to be allocated there would be pressure for piecemeal growth here over time, leading to opportunities missed and potentially problematic high growth.”

Assessment findings at this stage

Part 2 of this report presents an assessment of the Alton Neighbourhood Plan as a whole, as it stands at the current time (consultation on the pre-submission plan). This is an opportunity to appraise Growth Scenario 1 alongside wider aspects of the proposed Neighbourhood Plan, in particular the proposed suite of area-wide and site-specific development management policies. However, the appraisal conclusions reached for the plan as a whole are as per those reached for Growth Scenario 1.

No specific recommendations are made as part of the appraisal. However, some suggestions are made, including in respect of further policy detail aimed at ensuring avoidance / mitigation of historic environment impacts. A key recommendation is that the tension with the Local Plan is resolved at the earliest opportunity, as it is very important not to hinder the progress of the Local Plan.

Next steps

This Environmental Report is published for consultation alongside the 'pre-submission' version of the Alton Neighbourhood Plan under Regulation 14 of the Neighbourhood Planning Regulations 2012. The aim is to inform the consultation.

Consultation responses received will be taken into account by the Town Council, who will then aim to finalise the plan for submission to East Hampshire District Council (Regulation 15). The District Council will then run another consultation (Regulation 16) before passing representations received to an Independent Examiner.

The Examiner will then examine whether the plan meets with the nationally established Basic Conditions, and is in general conformity with the Local Plan. If the outcome of the Independent Examination is favourable, the Alton Neighbourhood Plan will then be subject to a referendum. If more than 50% of those who vote are in support it will then be 'made' part of the Development Plan for East Hampshire.



A view over Alton

1. Introduction

Background

- 1.1 AECOM is commissioned to lead on Strategic Environmental Assessment (SEA) in support of the emerging Alton Neighbourhood Plan 2021-41.
- 1.2 The Neighbourhood Plan is being prepared by Alton Town Council, under the Neighbourhood Planning Regulations 2012 and in the context of the emerging East Hampshire Local Plan. Once 'made' the Neighbourhood Plan will supersede the Alton Neighbourhood Plan 2011-28 and will have material weight when deciding on planning applications, alongside the Local Plan.
- 1.3 SEA is a required process for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating negative effects and maximising the positives.²

SEA explained

- 1.4 It is a requirement that the SEA process is undertaken in-line with the Environmental Assessment of Plans and Programmes Regulations 2004.
- 1.5 In-line with the Regulations, a report (known as the Environmental Report) must be published for consultation alongside the Draft Plan that assesses "the plan, and reasonable alternatives".³ The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 1.6 More specifically, the report must answer the following three questions:
 1. What has plan-making / SEA involved **up to this point**?
 - including in relation to 'reasonable alternatives'.
 2. What are the SEA findings **at this stage**?
 - i.e. in relation to the draft plan.
 3. What happens **next**?

This Environmental Report

- 1.7 This report is the Environmental Report for the Alton Neighbourhood Plan. It is published alongside the 'pre-submission' version of the plan, under Regulation 14 of the Neighbourhood Planning Regulations (2012, as amended).
- 1.8 This report answers each of the three questions introduced above in turn.⁴ Each question is answered within a discrete 'part' of the report.
- 1.9 Before answering question 1, there are two further introductory sections.

² Regulation 15 of the Neighbourhood Planning Regulations (2012, as amended) requires that each Neighbourhood Plan is submitted to the Local Authority alongside either: A) an environmental report; or, B) a statement of reasons why SEA is not required, prepared following a 'screening' process. The Alton Neighbourhood Plan has been subject to screening, through which it has been determined that SEA is a required. As such, there is a need to submit this Environmental Report (or an update).

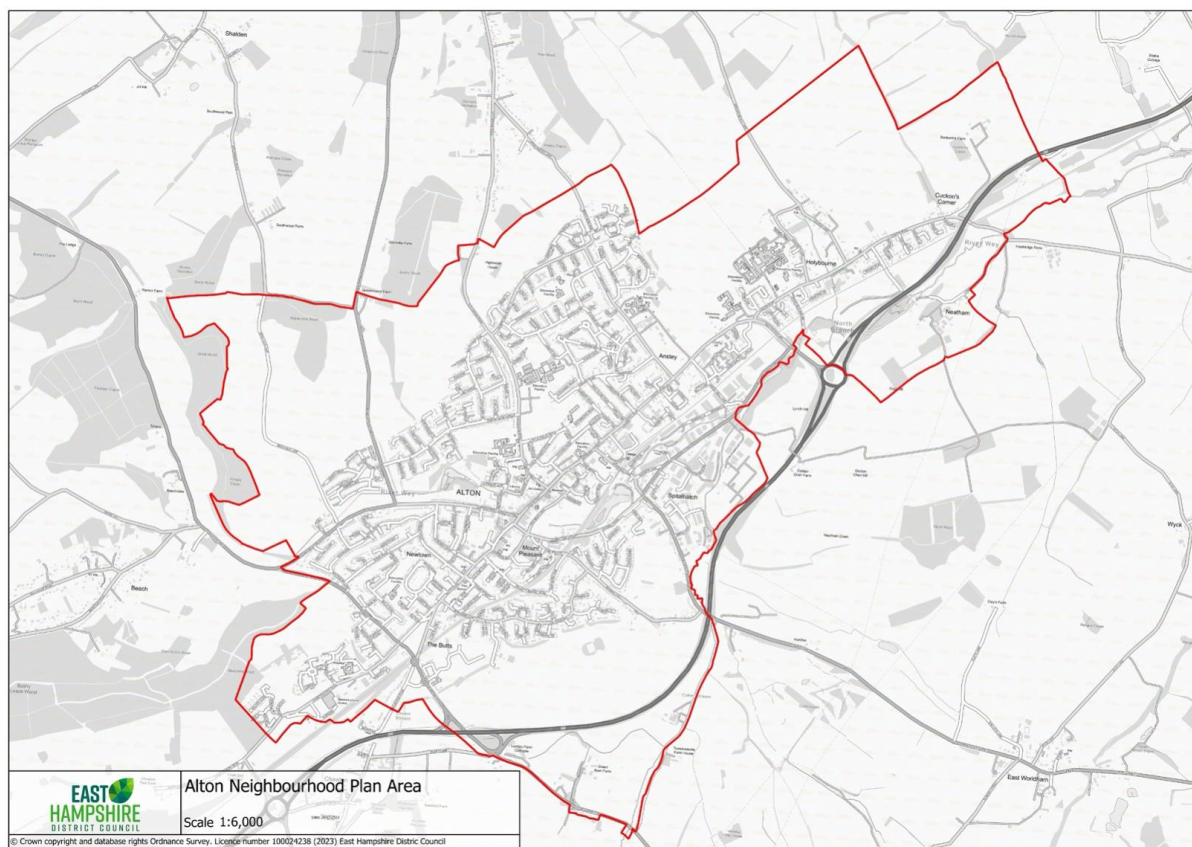
³ Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations 2004.

⁴ See **Appendix A** for further explanation of the report structure including its regulatory basis.

2. The plan scope

- 2.1 The plan area is shown within the figure below. It can be seen that parts of the Alton urban area now abut or are close to the edge of the plan area, such that there is the possibility of Alton expanding beyond the plan area.
- 2.2 A key aim of the Neighbourhood Plan is to ensure that Alton (as a settlement, i.e. potentially looking beyond the boundary of the plan area) delivers in the region of 1,700 homes over-and-above completions (homes delivered since the start of the plan period) and commitments (sites with planning permission).
- 2.3 1,700 homes is the growth quantum figure that the Draft East Hampshire Local Plan (2024) identifies as appropriate, i.e. in line with the emerging proposed spatial strategy (see policies SP1 and H1 in the Draft Local Plan). However, it is recognised that this figure is subject to change, as the Local Plan spatial strategy remains open to revision, including in light of the Government's current consultation on Proposed Reforms to the National Planning Policy Framework. As part of this, the Government is proposing an 87% increase to the 'standard method' housing need figure that is a key starting point for the Local Plan.
- 2.4 Beyond allocating sites to deliver on the emerging Local Plan housing requirement (along with site-specific policies to guide future planning applications), a key aim is to establish area-wide development management (DM) policies to inform all future planning applications. In doing so, the aim is to update the policies set out in the current Alton Neighbourhood Plan 2011-28.

Figure 2.1: The plan area (Alton Town Council area)



3. The SEA scope

Introduction

- 3.1 The aim here is to introduce the reader to the broad scope of the SEA, i.e. the sustainability topics and objectives that should be a focus of the assessment of the plan and reasonable alternatives.

Consultation

- 3.2 The SEA Regulations require that “*when deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies*”. In England, the consultation bodies are the Environment Agency, Historic England, and Natural England.
- 3.3 As such, these authorities were consulted a Draft Scoping Report in 2021. The Scoping Report was then finalised and published on the Town Council website.

The SEA framework

- 3.4 A key outcome of scoping is the SEA framework. Its purpose is to structure the appraisal of the plan and reasonable alternatives.

Table 3.1: The SEA framework

SEA topic	SEA objective
Air quality	Improve air quality and minimise and/or mitigate against all sources of environmental pollution.
Biodiversity	Maintain and enhance the extent and quality of biodiversity and geodiversity habitats and networks within and surrounding the Plan area
Climate change	Reduce the contribution to climate change made by activities locally. Support the resilience of the local area to the potential effects of climate change, including flooding.
Community wellbeing	Ensure growth locally is aligned with the needs of all residents and in suitably connected places, supported by the appropriate and timely provision of infrastructure to enable cohesive and inclusive communities.
Historic environment	Protect, conserve, and enhance the historic environment within and surrounding the plan area.
Landscape	Protect and enhance the character and quality of the immediate and surrounding landscape, including green infrastructure corridors.
Land, soil, and water resources	Ensure the efficient and effective use of land. Protect and enhance water quality and use and manage water resources in a sustainable manner.
Transportation and movement	Promote sustainable transport use and reduce the need to travel.

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

4. Introduction (to Part 1)

Overview

- 4.1 Plan-making has been underway since 2023 but the aim here is not to provide a comprehensive explanation, or audit trail, of work to date. Rather, the aim is to explain work undertaken to develop and appraise **reasonable alternatives** in 2024 ahead of finalising the Neighbourhood Plan for consultation under Regulation 14 (i.e. the current consultation stage).
- 4.2 More specifically, this part of the report presents information on the consideration given to reasonable alternative approaches to addressing a particular issue that is of central importance to the plan, namely allocation of land for development. The decision was taken to refer to '**growth scenarios**'.

Why focus on growth scenarios?

- 4.3 The decision was taken to focus on 'growth scenarios' because allocating land for development is the key task facing the local plan, as well as that which generates the greatest degree of interest amongst stakeholders and the public. Also, it goes without saying that through assessment it will be possible to meaningfully differentiate between growth scenarios in terms of 'significant effects', and guidance is clear that SEA must focus only on significant effects.

N.B. **individual site options** are not reasonable alternatives (where the objective of the plan is not to allocate an individual site option). However, individual site options are clearly important, and are considered in detail in Section 5, as part of the process of arriving at reasonable growth scenarios.

Whose responsibility?

- 4.4 It is important to be clear that:
- **Defining scenarios** – is ultimately the responsibility of the plan-maker, although the SEA consultant (AECOM) is well placed to advise.
 - **Assessing scenarios** – is the responsibility of the SEA consultant.
 - **Deciding a preferred approach** – is the responsibility of the plan-maker.

Structure of this part of the report

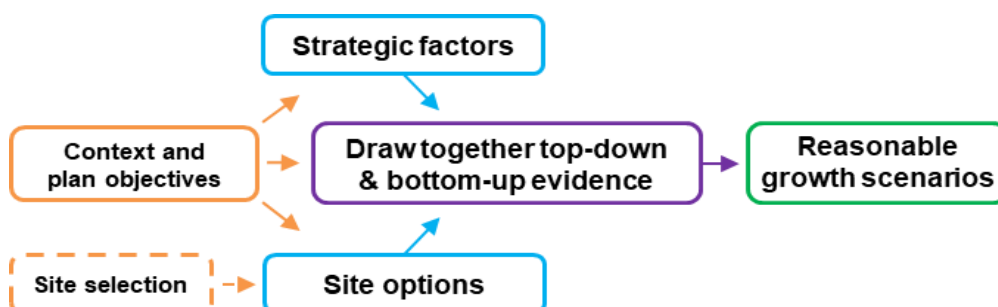
- 4.5 This part of the report is structured as follows:
- **Section 5** – explains the process of defining scenarios.
 - **Section 6** – presents the outcomes of assessing scenarios.
 - **Section 7** – explains reasons for supporting the preferred approach.

5. Defining growth scenarios

Introduction

- 5.1 The aim here is to explain a *process* that led to the definition of growth scenarios for assessment, as summarised in Figure 5.1.⁵

Figure 5.1: Defining growth scenarios



Structure of this section

- 5.2 This section is structured so as to:
- explore **strategic factors** with a bearing on growth scenarios;
 - consider individual **site options** in contention for allocation; and
 - draw upon the preceding sections to define **growth scenarios**.

Strategic factors

- 5.3 This section covers: A) Growth quantum; and then B) Broad spatial strategy.

Growth quantum

- 5.4 The Draft East Hampshire Local Plan directs 1,700 homes to Alton, over-and-above completions and commitments. The Local Plan also proposes three small / medium-sized allocations for a total of 264 homes and a 1,000 home strategic allocation at Neatham Down, to the east of Alton. This leads to a 436 homes residual requirement for the Alton Neighbourhood Plan.
- 5.5 However, there is also a need to test a scenario whereby the Local Plan does not allocate Neatham Down (albeit the decision on whether or not to allocate is outside the remit of the Neighbourhood Plan, including as the site falls outside of the plan area). That is because of concerns regarding the site and because there is no single site suited to providing for the 436 home residual requirement, such that there would be a need to allocate several small sites, thereby giving rise to concerns around piecemeal urban expansion of Alton, with opportunities missed to deliver comprehensive infrastructure-led growth.
- 5.6 Without Neatham Down the residual figure to be provided for through the Neighbourhood Plan increases to 1,436 homes.

⁵ The aim is to meet the legal requirement (Schedule 2(8) of the SEA Regulations) to present “an outline of the reasons for selecting the alternatives dealt with” within the Environmental Report.

- 5.7 It is recognised that the number of homes directed to Alton by the Local Plan is subject to change, as discussed. However, there is a need to progress the Alton Neighbourhood Plan on the basis of current understanding / best available evidence. This is for two key reasons. Firstly, there is a need to support timely progression of the Local Plan, including noting the current national consultation on planning reform, as discussed above. Secondly, with an up-to-date Neighbourhood Plan benefit from a degree of protection from ‘the presumption in favour of sustainable development’ (see NPPF paragraph 14).

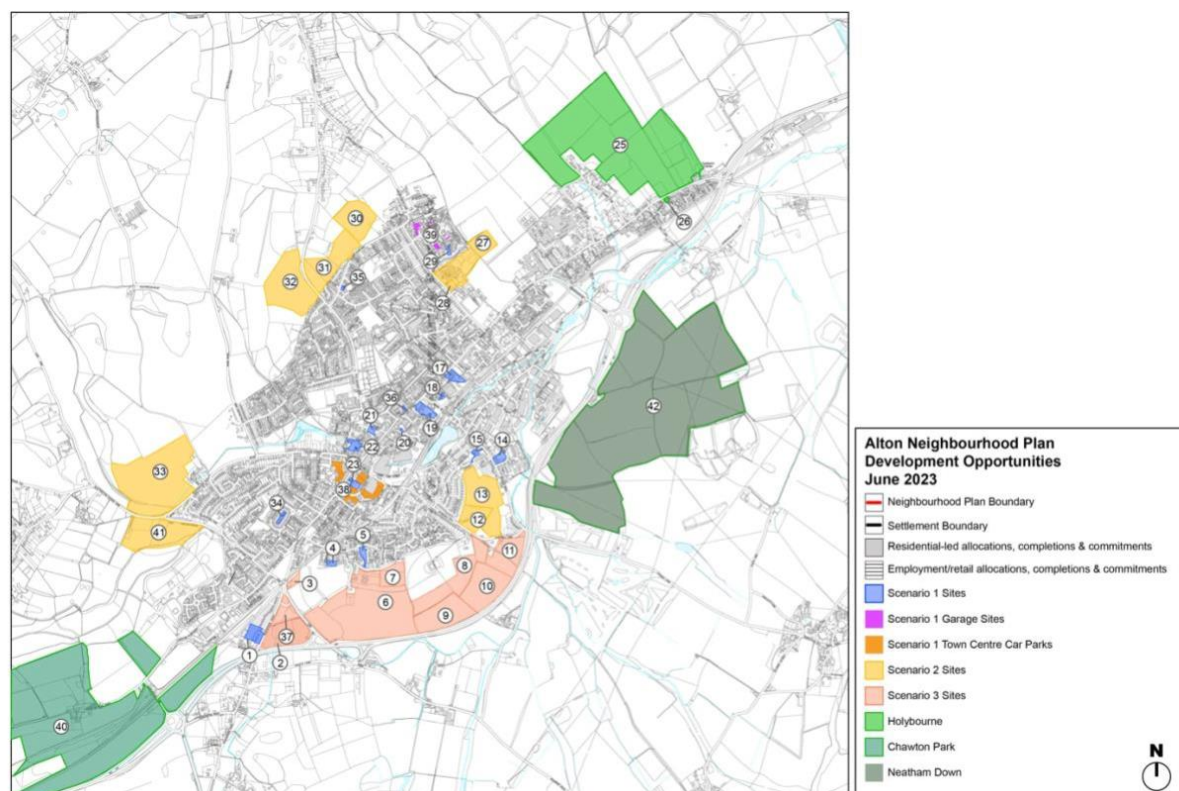
Broad spatial strategy

- 5.8 The following three key factors are considered to be of particular importance in terms of framing work to define reasonable growth scenarios:
- Landscape – Alton is strongly associated with the River Wey valley, and there has long been a focus on retaining this historical association and preventing the town from breaking out of the confines of the valley. Equally, there is a clear need to avoid development on higher ground, as far as possible, with a view to impacting long distance views from valued viewpoints, both within and outside of the South Downs National Park.
 - Comprehensive growth – Alton has seen considerable growth over recent years and decades, and whilst new homes have delivered or facilitated delivery of a range of infrastructure, there is a view that additional benefits could have been realised if growth had been more concentrated / co-ordinated, i.e. less piecemeal. Planning comprehensively with a long term perspective puts the Town Council in a strong position when negotiating with land-owners in terms of making land available for non-housing uses, delivering a good mix of homes to include affordable housing, delivering infrastructure and making financial contributions to infrastructure delivery.
 - Holybourne – Alton itself is adjoined by the settlement of Holybourne, which, although within the Neighbourhood Plan area, retains a separate village identity. Options for growth at Holybourne have been considered over the years, including as the village is closely associated with the valley and there is good (flat) access to Alton train station and the town centre beyond, plus there is a secondary school and a primary school at Holybourne. However, it is also recognised that there are a range of sensitivities, particularly historic environment-related, including given a conservation area and large scheduled monument linked to a Roman road.

Site options

- 5.9 A site options assessment process has been led by ONH, on behalf of the Town Council, and the aim here is to provide an overview. The intention is then to draw upon the site assessment work in order to identify a shortlist of site options to progress to the reasonable growth scenarios.
- 5.10 Figure 5.2 shows a long list of site options, with sites placed into clusters. It can also be seen that the figure shows the location of two large strategic site options that fall outside of the Neighbourhood Plan area but which nonetheless are very closely related to Alton, namely: Neatham Down to the east; and Chawton Park Farm to the south. Latest understanding is that the Local Plan proposes to allocate Neatham Down only.

Figure 5.2: Long list of site options



- 5.11 A clear starting point is sites within the **urban area**, i.e. sites shown in blue. Of these sites, one is proposed for allocation by the Draft Local Plan (2024), namely Site 1, which is known as Land at Travis Perkins (24 homes).
- 5.12 The majority of other blue sites comprise previously developed / brownfield land, and there is clearly a need to maximise supply from this category of site. However, there is equally a need to take a precautionary approach that acknowledges delivery risks. This is because committing to delivering sites that then face delivery issues in practice (e.g. due to land ownership issues or viability issues given existing use value) could contribute to a risk of the District being subject to the presumption in favour of sustainable development.
- 5.13 Ultimately, the site assessment process identifies 130 homes supply from these sites, but: A) 101 homes of this supply already has planning permission; and B) the remaining 29 homes supply is spread across very small sites. With regards to (A), the District Council has agreed that this figure can be deducted from the 1,700 home requirement for Alton, because doing so does not double count permissions already accounted for. With regards to (B), however, this figure cannot be deducted due to double counting the Local Plan windfall assumption.
- 5.14 The next matter for consideration is **Holybourne**, where a large parcel of land to the east has long been promoted as available for development. There has been significant and consistent local opposition to this site over a number of years, but equally there is a strategic case for directing a proportion of Alton's growth to Holybourne, as discussed. Also, the most recent situation is that the new landowner is proposing 223 homes on the just the southwest part of the site only, and there are few concerns regarding a risk of future development creep. It would also deliver a new village hall and ultimately this site is judged to perform reasonably well when viewed in isolation.

5.15 Next there is a need to those sites closely related to the settlement **edge of Alton itself**, which are shown in yellow. A key point to note is that these sites generated limited concern amongst local residents as part of an informal engagement exercise undertaken in 2023. Taking these sites in turn:

- North – Sites 30, 31 and 32 perform poorly on landscape grounds. The town has recently expanded in this direction, and further expansion would involve raised land that is visually prominent. Furthermore, the topography means that there is not easy walking/cycling access from the town centre.
- Northeast – this is Alton school and is now understood to be unavailable.
- Southeast – these two sites are collectively known as Land at Weysprings and are judged to perform reasonably well. This is quite steeply rising land, and this makes access challenging, but there is thought to be a solution.
- West – both of these sites are proposed for allocation by the Draft Local Plan, with the southern site falling outside of the Neighbourhood Plan area. With regards to the northern site, which is known as Brick Kiln Lane and which would involve continuing recent expansion of the town in this direction, whilst the Draft Local Plan allocates the site for 150 homes, it is being promoted for 225 homes. The additional 75 homes does not generate any significant concerns, would make best use of the site and could lead to additional funds being available for infrastructure etc.

5.16 Finally, there is a need to consider land to the **south of Alton**, shown in pink. As can be seen, there are a number of sites being promoted in this area, but there is a strong desire to ensure that any growth is comprehensive rather than piecemeal. Landscape is a significant issue in this area, as the effect of allocation would be to expand the town beyond the confines of the River Wey valley and the South Downs National Park is near adjacent to the south. Indeed, the development would somewhat face away from the town, as there would be a need to retain higher ground adjacent to the current settlement edge as open space. However, the A31 would serve to contain expansion very effectively, and there is an opportunity to deliver new community and transport infrastructure to the benefit of existing as well as new residents.

5.17 The capacity of South Alton is understood to be 900 homes (also, Land at Weysprings is near-adjacent, and would deliver 100 homes in conjunction, leading to further merit in terms of securing comprehensive urban expansion of Alton). However, it is recognised that there would be a need for further detailed work to consider green infrastructure / undeveloped open space within the site, particularly with a view to avoiding and mitigating landscape impacts, which could reduce the site capacity, e.g. to ~800 homes.

The reasonable growth scenarios

5.18 The starting point is three Draft Local Plan allocations:

- Travis Perkins – 24 homes
- Whitedown Lane – 90 home
- Brick Kiln Lane – 150 homes

- 5.19 Also, there is clear support for assuming: A) 101 homes from sites with planning permission (because it has been established that this would not involve double counting); and B) an additional 75 homes at Brick Kiln Lane.
- 5.20 The next port of call is then allocation (through the Neighbourhood Plan) of two strongly performing sites, namely:
- Land at Weysprings – 100 homes
 - Holybourne – 223 homes
- 5.21 This leads to a total of supply of 540 homes, i.e. a figure 1,160 homes short of the 1,700 home housing requirement. This shortfall exceeds the capacity of both South Alton (900 homes) and Neatham Down (1,000 homes), hence there is a need to additionally allocate Holybourne for 223 homes.
- 5.22 Allocation of Holybourne leads to a supply of 763 homes, which is 937 homes short of the 1,700 home target. This residual requirement could then be met and exceeded ('buffered') via allocation of Neatham Down through the Local Plan or, alternatively, if the decision were to be taken by the District Council not to allocate Neatham Down through the Local Plan, then it could be almost met by allocation of South Alton for 900 homes.
- 5.23 This leads to two reasonable alternative growth scenarios for appraisal and consultation, as shown in the table below.

Table 5.1: The reasonable alternative growth scenarios (with constants greyed-out)

Supply component		Growth scenario 1	Growth scenario 2
Local Plan allocation	Travis Perkins	24	24
	Whitedown Lane	90	90
	Brick Kiln Lane	150	150
	Neatham Down	-	1,000
Additional brownfield supply from permitted sites		101	101
Neighbourhood Plan allocation	Expanded Brick Kiln Lane	75	75
	Land at Weysprings	100	100
	Holybourne	223	223
	South Alton	900	-
Total homes		1,663	1,763

6. Growth scenarios assessment

Introduction

6.1 The aim of this section is to present assessment findings in relation to the two reasonable alternative growth scenarios introduced above.

Assessment findings

6.2 Within Table 6.1, each row (i.e. for each of the topics that comprise the SEA framework) the columns to the right hand side:

- Rank the scenarios in order of preference where a rank of 1 indicates the preferable scenario (and with a gold star used as a visual aid), an equals sign (=) used where the scenarios cannot be differentiated with any confidence; and a question mark (?) used where there is insufficient evidence to make a judgement.
- Predict significant effects using red-amber-green (RAG) shading.⁶

Table 6.1: Growth scenarios assessment findings

Topic	Scenario 1 Constants + South Alton	Scenario 2 Constants + Neatham Down
Air quality	=	=
Biodiversity	★ 1	2
Climate change	?	?
Communities	=	=
Historic env	=	=
Landscape	2	★ 1
Land, soil, water	=	=
Transport	★ 1	2

⁶ Red indicates a significant negative effect; amber a negative effect of limited or uncertain significance; light green a positive effect of limited or uncertain significance; and green a significant positive effect. No colour indicates a neutral effect.

- 6.3 The most significant conclusion is reached under ‘transport’, with support for a comprehensive urban extension to the south of the town and concern regarding expansion of the town to the east of the A31 (Neatham Down). South Alton is better support walking and cycling, and would deliver new transport infrastructure, whilst Neatham Down would risk being car dependent, and it is not clear that there is any particular bus connectivity opportunity.
- 6.4 The next key topic for consideration is ‘landscape’. Under this heading it is fair to conclude a preference for Neatham Down, because land to the south of Alton is near adjacent to the South Downs National Park. Also, this open raised land is crossed by public rights of way and valued by residents of Alton, and the effect of growth here will be to expand the town beyond the confines of the River Wey valley. However, it is not clear that the nearby land comprises a particularly sensitive part of the National Park and a southern Alton urban extension would be fully contained by the A31, such that there would be no risk of future development creep / sprawl.
- 6.5 In contrast, there is a concern regarding development creep at Neatham Down (albeit Copt Hill to the north, Neatham Down to the south and woodlands to the east would provide containment), and this is an attractive rolling landscape.
- 6.6 Also, in respect of both transport and landscape, there is a need to consider that failure to support a comprehensive South Alton scheme would risk the land coming forward in a piecemeal way over time, with opportunities missed including in terms of strategic planning for transport and green infrastructure.
- 6.7 The appraisal also flags two other key issues, namely:
- Climate change – there is a need to consider which of the two sites / schemes (Neatham Down vs South Alton) would be better suited to delivering net zero carbon development to an exacting standard, recognising that this has major cost implications such that, in practice, it could transpire that there is a need to compromise on decarbonisation objectives in order to deliver on wider objectives such as infrastructure delivery and affordable housing. Flood risk is not an issue at either site.
 - Biodiversity – there are no major concerns with either site, but it is appropriate to flag Neatham Down’s location adjacent to a large ancient woodland, albeit there is also a chalk downland habitat creation opportunity.
- 6.8 The other key consideration is that both growth scenarios are supported in terms of ‘communities’ objectives because a proactive approach would be taken to providing for housing needs and also ensuring that new community infrastructure is delivered alongside new homes. Scenario 2 could deliver more homes, but there is a concern that the development would be isolated from Alton and funding would be diverted to ‘grey’ infrastructure.
- 6.9 Under the remaining three headings the scenarios are judged to perform broadly on a par, and it is not possible to predict that effects of any significance:
- Air quality – whilst there are transport-related concerns with Neatham Down (also higher growth via growth coming forward at both Neatham Down and to the south of Alton in the longer term) there is little reason to suggest that this translates as an air quality concern. There is no designated Air Quality Management Area (AQMA) within the town.

- Historic environment – there are a range of historic environment constraints locally, including with a bearing on growth at Holybourne (where a 223 home allocation is assumed under both scenarios). However, it is not clear that there are any significant concerns (see further discussion in Section 9).
- Agricultural land quality – there is no potential to differentiate between the growth scenarios, with both Neatham Down and South Alton shown by the nationally available dataset to comprise grade 3 quality land, and neither site has been surveyed in detail. Holybourne is more sensitive.

7. The preferred approach

Introduction

7.1 The aim of this section is to present the plan-maker's response to the appraisal and, in turn, reasons for supporting the preferred approach.

Reasons for supporting the preferred approach

7.2 The Town Council's planning consultant provided the following text:

“Scenario 1 is supported on balance, in light of the assessment. There is a strong preference for delivering a comprehensive urban extension, to include strategic planning for transport and green infrastructure. This urban extension should link into the settlement edge as effectively as possible, in order to minimise infrastructure requirements and costs, thereby ensuring funding is available to direct towards the achievement of wider objectives. Landscape concerns with South Alton are acknowledged, but land to the south of Alton relates much better to the town than Neatham Down, and even if it were not to be allocated there would be pressure for piecemeal growth here over time, leading to opportunities missed and potentially problematic high growth.”



Concept plan for growth to the south of Alton

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

8. Introduction (to Part 2)

- 8.1 The aim here is to present an assessment of the current draft ('pre-submission') version of the Alton Neighbourhood Plan 2021-41.
- 8.2 In practice, this means presenting elaborating on the assessment of Growth Scenario 1 from Section 6.

Overview of the Neighbourhood Plan

- 8.3 The plan document presents 25 policies under six headings: Design; Housing; Transport; Communities, health and recreation; Education; and Alton town centre. Five of these policies deal with the proposed housing-led allocations, and it is these policies that are naturally a focus of the assessment, as it is the allocation of land for development that gives rise to significant effects.

Assessment methodology

- 8.4 The assessment identifies and evaluates 'likely significant effects' on the baseline, drawing on the sustainability objectives identified through scoping (see Table 3.1) as a methodological framework.
- 8.5 Every effort is made to predict effects accurately; however, this is inherently challenging given the strategic nature of the policies under consideration and understanding of the baseline that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g. in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously and explained within the text as far as possible (given a need for conciseness). In many instances, given reasonable assumptions, it is not possible to predict 'significant effects', but it is possible to comment on merits (or otherwise) of the draft plan in more general terms.
- 8.6 Finally, it is important to note that effects are predicted taking account Schedule 1 of the SEA Regulations. As part of this consideration is given to cumulative effects, i.e. effects in combination with other plans, programmes and projects.

A note on Neatham Down

- 8.7 The assessment of the Draft Alton Neighbourhood Plan must be undertaken in the context of the Draft East Hampshire Local Plan, which allocates Neatham Down for 1,000 homes. However, as discussed above, the hope is that the Local Plan will be amended to remove Neatham Down, given the Neighbourhood Plan proposal to alternatively allocate South Alton for 900 homes. Whether or not this will be the case cannot be foreseen, but the assumption is that the Local Plan will be amended. This is a fair assumption to make, for the purposes of the current appraisal, because were it to transpire that the Local Plan is not amended, to remove Neatham Down, there would be a need to amend the Neighbourhood Plan to remove South Alton.

N.B. there are also wider uncertainties around housing need / the housing growth 'target' for East Hampshire, given the current Government consultation on Planning Reform; however, the implications cannot be foreseen.

9. Assessment of the Draft Plan

- 9.1 A discussion is presented under each of the thematic headings that together comprise the core of the SEA framework (see Section 3).

Air quality

- 9.2 There is no designated Air Quality Management Area (AQMA) and the town is quite effectively bypassed by the A31. However, there is nonetheless a need to consider car traffic-related air pollution hotspots within the town, including the town centre and other locations where there are sensitive receptors.
- 9.3 There is potentially a risk associated with the proposed growth locations in combination (also accounting for the Local Plan). However, there is no reason to suggest a concern over-and-above the Draft Local Plan (which was prepared with reference to evidence gathering and has now been the subject of formal consultation). South Alton is judged here to be quite clearly preferable to Neatham Down in transport terms, as discussed further below, which does, in turn, suggest that it is the preferable site from an air quality perspective.
- 9.4 However, it is recognised that there would be pressure to locate new homes in proximity to the A31, in order to concentrate new homes on lower lying land within the site / leave raised land undeveloped as landscape mitigation.
- 9.5 With regards to DM policy, the key point to note is a requirement for the South Alton allocation to be the focus of an air quality and noise assessment.
- 9.6 In conclusion, there are some issues associated with South Alton, and there is a need for further work to consider the in-combination impacts of growth locations, but on balance it is judged appropriate to predict a **neutral effect**.

Biodiversity

- 9.7 There are limited biodiversity concerns associated with South Alton, but there is a need to consider stream corridors associated with priority habitat located at the northern and southern extents of the site.
- 9.8 Another consideration is that support for an additional 75 homes at Brick Kiln Lane could lead to pressure for built form to encroach towards Hungry Copse, which is an ancient woodland located to the north of the site. However, concerns are limited, recognising that the woodland is a prominent 'hanger' woodland associated with raised land, such that there will be a clear case for ensuring a generous green buffer.
- 9.9 Finally, there are mature boundaries around Land at Weysprings, comprising field boundaries shown on historic mapping and also two historic chalk pits marked as wooded on historic mapping. The nationally available dataset suggests some priority habitat at the southern and south-eastern extents.
- 9.10 With regards to DM policy, the key point to note is site-specific policies that reference the sensitivities discussed above, and also a proposal to deliver a new targeted 2.3 area of green space within South Alton. Also, there is a requirement for all major developments to calculate an Urban Greening Factor, which is a method that is having some success in the London context.

9.11 In conclusion, the proposed allocations are associated with some biodiversity sensitivities, but this is largely unavoidable in the Alton context, and there is good potential to take steps to avoid/mitigate impacts and deliver biodiversity enhancements in line with established strategy. A **neutral effect** is predicted.

Climate change

9.12 Focusing on built environment decarbonisation, the Draft Local Plan requires that major developments are expected to be delivered as net zero developments calculated using the energy-based approach⁷, which is considered to represent best practice (including because 'as built' / post occupation performance can be monitored simply using an energy meter).

9.13 In practice there can be a need to compromise on built environment decarbonisation / net zero objectives, e.g. to ensure that funding is available for infrastructure delivery and affordable housing, but there is little reason to suggest that this would be the case for the proposed Neighbourhood Plan allocations. Development viability is strong at Alton, and none of the proposed sites are associated with any obvious abnormal development costs. There is particular support for boosting the capacity of Land at Brick Lane by 75 homes (relative to the allocation in the Draft Local Plan). However, it is noted that the site promoter's recent response to the Draft Local Plan consultation proposes that the policy on net zero development is deleted (which, to reiterate, is considered to represent a best practice policy).

9.14 Aside from climate change mitigation / decarbonisation, there is also a need to consider climate change adaptation / resilience, which in practice means considering flood risk, recognising that flood risk zones will expand and flooding will become more frequent in the future due to climate change. In this regard the key proposed allocation is Land at Brick Kiln Lane, recognising the near adjacent source / upper reaches of the River Wey. The flood risk zone is a constraint to site access, but there is understood to be a suitable solution, and the proposed additional 75 homes is unlikely to generate a concern.

9.15 With regards to DM policy, the key point to note is the following requirement in respect of Brick Kiln Lane: *"The Sustainable Drainage Scheme should provide suitable SUDS or alleviation solution to reduce the flooding around the proposed site entrance along the Basingstoke Road and the surface water run-off entering the site from the farmland above Brick Kiln Lane."*

9.16 In conclusion, climate change mitigation is a clear national priority, albeit East Hampshire has not committed to a net zero target date in advance of the national target date of 2050 (which is rare).⁷ In this light, there is a need to take all steps through spatial strategy and site selection to aid transport and built environment decarbonisation (rather than solely relying on DM policy that may not be fully implemented in practice). In this light, it is considered appropriate to flag a **'moderate or uncertain' negative effect** at this stage, subject to consultation responses including from the site promoters, who are encouraged to commit to delivering net zero developments in line with the requirements set out in the Draft Local Plan.

⁷ See carboncopy.eco/local-climate-action)

Communities

- 9.17 There is support for the proposed strategy as a proactive approach to providing for housing needs and supporting strategic schemes well suited to delivering affordable housing and community infrastructure. In particular, South Alton can deliver a local 'hub' and a primary school, as well as a strategic green infrastructure. Also, there is support for proposals at Holybourne, where the proposed scheme is greatly reduced in extent, relative to previous proposals, but there remains a proposal to deliver a new village hall. There will be an impact to a designated Local Green Space, but it is envisaged that this could be more than compensated for by new green / play space within the site.
- 9.18 However, it is important to be clear that not supporting the Draft Local Plan potentially creates an issue for progressing the Local Plan and, in turn, an issue in terms of providing for housing needs (and wider development needs) across East Hampshire. Having said this, the presumption in favour is in place to ensure that housing comes forward where a local plan is out of date, such that housing needs are met (albeit the housing can tend to come forward in sub-optimal locations, and in a sub-optimal way in terms of infrastructure delivery).
- 9.19 With regards to DM policy, there are a range of policies supportive of 'communities' related sustainability objectives. Focusing on site-specific policy, the key requirements for South Alton are: *"land allocated for the provision of a new primary school (if required) together with associated parking... [and] land allocation for the provision of a new flexible use local hub..."*
- 9.20 In conclusion, it is judged appropriate to predict a '**moderate or uncertain**' **positive effect** given a focus on strategic sites suited to delivering a good housing mix and infrastructure alongside net homes. However, there is a tension with the Local Plan that must be resolved at the earliest opportunity.

Historic environment

- 9.21 South Alton is subject to quite notably low historic environment constraint in the Alton context, but historic environment constraint is a key consideration in respect of both Holybourne and Brick Kiln Lane.
- 9.22 At Holybourne it is not clear that there will be any direct impacts to the setting of any listed buildings or the conservation area, but there is a need to consider impacts to appreciation of the village from walkers along the St Swithun's Way long distance footpath, including on the approach to the Grade II* listed village church. Also, archaeology is likely a constraint in this area, but this is presumably well-understood, recognising that the site has been considered as a development option for a number of years. It is likely to be the case that archaeology is not a constraint to the extent that the site could not be developed alongside a programme of archaeological investigation, recording, preservation etc; and there are not known to be concerns regarding impacts to the setting of adjacent scheduled monument, which is used as a cricket pitch.
- 9.23 At Brick Kiln Lane, there is a notable cluster of Grade II listed buildings, including out houses, which can be appreciated from Brick Kiln Lane. There is a case for drawing upon this cluster of listed buildings as an appropriate western extent to the expansion of Alton, or reducing the quantum of new homes delivered within the site to boost potential to retain open space.

- 9.24 With regards to DM policy, the key point to note is that the site-specific policy for Brick Kiln Lane does not currently reference the cluster of listed buildings at Will Hall Farm. It is recommended that further consideration is given to this matter, given the proposal to increase the site capacity by 75 homes.
- 9.25 In **conclusion**, there are tensions with historic environment objectives, but this is largely unavoidable in the Alton context, and there is a need to recall that the baseline situation is one whereby development continues to come forward but in a less well-planned way under the presumption in favour of sustainable development. On balance a **neutral effect** is predicted, but this is with some uncertainty and Historic England will wish to comment further.

Landscape

- 9.26 This is a key issue for the main proposed allocation, namely South Alton (900 homes) given the nearby South Downs National Park. Also, this open raised land is crossed by public rights of way and valued by residents of Alton, and the effect of growth here will be to expand the town beyond the confines of the River Wey valley. However, it is not clear that the nearby land comprises a particularly sensitive part of the National Park and a southern Alton urban extension would be fully contained by the A31, such that there would be no risk of future development creep / sprawl. This is a key benefit of the site.
- 9.27 Brick Kiln Lane is also associated with landscape sensitivity and might ideally have been planned for comprehensively with the recently delivered site adjacent to the east. However, it is considered likely that once delivered (in combination with the proposed Local Plan allocation to the south, namely Whitedown Lane), this will represent a long-term western extent to the town, such that there is confidence around maintaining a landscape gap to Beech.
- 9.28 Holybourne is sensitive on account of there being views into / across the site from all directions (given public footpaths on three sides of the site). However, this is relatively low lying land in the Alton context, and there is considered good low risk of future development creep, given the scheduled monument to the east and the St Swithun's Way long distance footpath to the north.
- 9.29 With regards to DM policy, the key point to note is that there are clear requirements set in respect of leaving raised land undeveloped at all of the proposed allocations. Focusing on South Alton, there is a need for further work to confirm how 900 homes can be delivered within the site, alongside suitable green and blue infrastructure and other uses, recognising that some of the masterplanning work undertaken to date has been with the aim of 800 homes.
- 9.30 In conclusion, there is a clear need to flag a '**moderate or uncertain' negative effect** at this stage, given the National Park sensitivity, albeit detailed work has been undertaken to confirm the potential to avoid and mitigate impacts.

Land, soil, water

- 9.31 Focusing on loss of productive agricultural land, the majority of the Alton edge is shown by the nationally available dataset to comprise grade 3 quality land, and very little land has been surveyed (which is necessary to establish agricultural land quality with any certainty). Holybourne is associated with grade 2 quality land, according to the national dataset, but it is not clear that the quantum of agricultural land that would be lost to development is significant.

9.32 Other key issues can relate to minerals safeguarding areas, capacity at wastewater treatment works and other water quality impact pathways. However, there are not known to be any significant concerns.

9.33 In conclusion, a **neutral effect** is predicted.

Transport

9.34 South Alton is not ideally located in transport terms given topography and existing bus and walking/cycling routes linking to the town centre, but as a strategic scheme there will be good potential to deliver transport infrastructure, and also achieve a modest degree of trip internalisation. Work has been undertaken that indicates the potential to deliver a through route linking two B-roads, which could help to avoid problematic traffic congestion on existing roads and, in turn, issues for walking/cycling and bus services.

9.35 Holybourne and Brick Kiln Lane are both some way distant from the town centre and train station, but walking/cycling connectivity would be via a flat route. Brick Kiln Lane is also fairly well linked to the community hub at the south-western extent of Alton, as is the proposed South Alton strategic site.

9.36 With regards to DM policies, a point to note is a requirement for any planning application for South Alton to be accompanied by a Transport Assessment that:

- *“... makes provision for the creation of a ‘link road’ through the development site... The link road shall be designed to serve the development site, but to enable through traffic to by-pass the town centre to alleviate congestion and improve air quality. A planning obligation will be required to ensure this is delivered in an early phase of the scheme.*
- *... details improvements to existing public rights of way to access the town centre on foot and by bicycle and the creation of new active travel routes from the east and west... to connect into the existing active travel network, as shown on the Policies Map.”*

9.37 In conclusion, the Neighbourhood Plan is considered to represent a proactive response to delivering new homes whilst avoiding transport issues and realising opportunities, hence a **‘moderate or uncertain positive effect’** is predicted.

Conclusions on the draft plan

9.38 The appraisal predicts **positive effects** (of ‘moderate or uncertain’ significance) in respect of communities and transport objectives but **negative effects** (of ‘moderate or uncertain’ significance) in respect of climate change mitigation and landscape objectives. The appraisal otherwise predicts neutral effects.

9.39 No specific recommendations are made as part of the appraisal. However, some suggestions are made, including in respect of further policy detail aimed at ensuring avoidance / mitigation of historic environment impacts. A key recommendation is that the tension with the Local Plan is resolved at the earliest opportunity, as it is very important not to hinder the progress of the Local Plan.

Part 3: What are the next steps?

10. Next steps

Plan finalisation

- 10.1 This Environmental Report is published for consultation alongside the Draft ('Pre-submission') Neighbourhood Plan. As discussed in Section 1, the aim of this report is to inform the consultation and subsequent plan finalisation.
- 10.2 Following the consultation the plan will be updated for submission. The Environmental Report will be updated only if necessary.
- 10.3 After being submitted to East Hampshire District Council, there will be a further opportunity for consultation (Regulation 16 'Publicity'). It will be for an Independent Examiner to consider consultation responses received as part of an examination process focused on testing whether the Neighbourhood Plan meets the Basic Conditions for Neighbourhood Plans and confirming that it is in general conformity with the Local Plan.
- 10.4 If the independent examination is favourable, the Alton Neighbourhood Plan 2021-41 will be subject to a referendum. If more than 50% of those who vote agree with the plan, then it will be 'made'. Once made, the plan will become part of the Development Plan for East Hampshire.

Monitoring

- 10.5 The SEA regulations require 'measures envisaged concerning monitoring' to be outlined in this report.
- 10.6 It is anticipated that monitoring of effects of the Neighbourhood Plan will be undertaken by East Hampshire District Council. The SEA has not identified any potential for significant negative effects that would require closer monitoring, led by the Town Council. However, transport and potentially also air quality issues specific to Alton could potentially be a focus of monitoring efforts.

Appendices

Appendix I: Legal checklist

As discussed in Chapter 1 above, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 (the Regulations) explains the information that must be contained in the Environmental Report; however, interpretation of Schedule 2 is not straightforward. Table AI.1 links the structure of this report to an interpretation of Schedule 2 requirements, whilst Table AI.2 explains this interpretation. Table AI.3 identifies how and where within this report the requirements have/ will be met.

Table AI.1: Questions answered by this report, in-line with an interpretation of regulatory requirements

			Questions answered	As per regulations, the report must include...
Introduction	What's the plan seeking to achieve?			▪ An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
	What's the SEA scope?	What's the sustainability 'context'?		▪ Relevant environmental protection objectives, established at international or national level ▪ Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What's the sustainability 'baseline'?		▪ Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan ▪ The environmental characteristics of areas likely to be affected ▪ Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What are the key issues and objectives that should be a focus?		▪ Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
Part 1	What has plan-making / SEA involved up to this point?			▪ Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) ▪ The likely significant effects associated with alternatives ▪ Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan
Part 2	What are the SEA findings at this current stage?			▪ The likely significant effects associated with the draft plan ▪ The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan
Part 3	What happens next?			▪ A description of the monitoring measures envisaged

Table AI.2: Interpretation of the regulations

<u>Schedule 2</u>	<u>Interpretation of Schedule 2</u>		
<i>The report must include...</i>	<i>The report must include...</i>		
(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>	
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'context'?</i>	i.e. answer - <i>What's the scope of the SA?</i>
(c) the environmental characteristics of areas likely to be significantly affected;	The relevant environmental protection objectives, established at international or national level		
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	i.e. answer - <i>What's the 'baseline'?</i>	
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The environmental characteristics of areas likely to be significantly affected		
(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What are the key issues & objectives?</i>	
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Key environmental problems / issues and objectives that should be a focus of appraisal		
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach')	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the Report]	
(i) a description of the measures envisaged concerning monitoring.	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.		
	The likely significant effects associated with the draft plan	i.e. answer - <i>What are the assessment findings at this current stage?</i> [Part 2 of the Report]	
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan		
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> [Part 3 of the Report]	

Table AI.3: ‘Checklist’ of how (throughout the SEA process) and where (within this report) regulatory requirements are met

Regulatory requirement	How requirement is met
A) The Environmental Report must present certain information	
1. An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Chapter 2 (‘What is the plan seeking to achieve’) presents this information.
2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters have been considered in detail through scoping work, which has involved dedicated consultation on a Scoping Report, which is available on the Town Council’s website. The ‘SEA framework’ – the outcome of scoping – is presented within Chapter 3 (‘What is the scope of the SEA?’).
3. The environmental characteristics of areas likely to be significantly affected;	
4. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.;	
5. The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	The SEA framework is presented within Chapter 3 (‘What is the scope of the SEA’). With regards to explaining “ <i>how...considerations have been taken into account</i> ”, Chapter 7 explains the Town Council’s ‘reasons for supporting the preferred approach’, i.e. explains how/ why the preferred approach is justified in light of alternatives.
6. The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);	Chapter 6 presents alternatives assessment findings (in relation to housing and employment growth, which is a ‘stand-out’ plan policy area). Chapters 9 presents an assessment of the draft plan. With regards to assessment methodology, Chapter 8 explains the role of the SEA framework/scope, and the need to consider the potential for various effect characteristics/ dimensions, e.g. timescale.

Regulatory requirement	How requirement is met
7. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	The assessment highlights certain tensions with environmental and wider sustainability objectives, which might potentially be actioned when finalising the plan.
8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Chapters 4 and 5 deal with 'Reasons for selecting the alternatives dealt with', in that there is an explanation of the reasons for focusing on particular issues and options ('scenarios'). Also, Chapter 7 explains the Town Council's reasons for selecting the preferred option (in-light of alternatives).
9. Description of measures envisaged concerning monitoring in accordance with Art. 10;	Chapter 11 presents measures envisaged concerning monitoring.
10. A non-technical summary of the information provided under the above headings	See start of this report
B) The Report must be published for consultation alongside the draft plan	
Authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the Draft Plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)	At the current time, this report is published for consultation alongside the draft plan, in order to inform the consultation.
C) The report must be taken into account, alongside consultation responses, when finalising the plan	
The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.	This report, and consultation responses received, will be taken into account when finalising the plan.