



Climate Change and Sustainable Construction Supplementary Planning Document (SPD)

Strategic Environmental Assessment and Habitats Regulations Assessment Screening Statement

February 2021

Appendix 3

Executive Summary

This screening statement considers whether a Strategic Environmental Assessment and / or full Habitats Regulation Assessment is required to be produced to accompany the Climate Change and Sustainable Construction Supplementary Planning Document (SPD).

The screening concludes that a SEA is not required for the SPD. It also concludes that the SPD listed would not need to be subject to full Appropriate Assessment under the Habitats Regulations Assessment.

1. Introduction

- 1.1 Reigate & Banstead Borough Council is preparing a Climate Change and Sustainable Construction Supplementary Planning Document (SPD) to inform new development in the borough on how to adapt to climate change, achieve other sustainability objectives and to support the Government's target of achieving zero carbon emissions by 2050.
- 1.2 This SPD will provide additional guidance to support implementation of policies in the Council's adopted Local Plan: Core Strategy (adopted 2014, reviewed 2019) and Development Management Plan (adopted 2019). Upon adoption, the SPD will be a material consideration in planning determinations in the borough.
- 1.3 The 2004 Planning and Compulsory Purchase Act and associated Regulations made all local development documents subject to Sustainability Appraisal, which met the requirements of Strategic Environmental Assessment (SEA) as defined by the EU Directive 2001/42/EC. The 2008 Planning Act removed the requirement for SPDs to be subject to Sustainability Appraisal and, as such, the Council does not propose to carry out a sustainability appraisal of the SPD.
- 1.4 The requirement for local planning authorities to carry out a SEA of relevant plans and programmes before adoption is set out in the Environmental Assessment of Plans and Programmes Regulations 2004.
- 1.5 However, there are exceptions to this and, in most cases, SPDs do not require SEA. This is acknowledged in the Planning Practice Guidance (PPG)¹, which sets out that *"supplementary planning documents do not require a sustainability appraisal but may in exceptional circumstances require a strategic environmental assessment if they are likely to have significant environmental effects that have not already been assessed during the preparation of the relevant strategic policies"*. Ultimately, it is the responsibility of the local planning authority to assess whether the plan is likely to have significant effects on the environment and make these conclusions public.
- 1.6 In addition, Article 6 of the Habitats Directive (as transposed into UK law by the Conservation of Habitats and Species Regulations 2017 ("the Habitats Regulations 2017)) requires an assessment of the implications of a plan, both individually and in

¹ PPG Strategic environmental assessment and sustainability appraisal Paragraph: 008 Reference ID:11-008-20140306

combination with other plans or projects, on designated 'Natura 2000' sites². If it is determined that a plan or project is likely to have a significant effect on these protected sites, an Appropriate Assessment should be undertaken.

- 1.7 The Council therefore prepared a draft Screening Statement to determine whether the proposed Climate Change and Sustainable Construction SPD should be subject to a SEA and/or Habitats Regulations Assessment (HRA)/Appropriate Assessment.

² Including Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar sites (which are treated as Natura 2000 sites)

2. Scope of the SPD under preparation

- 2.1 The paragraphs below summarise the purpose, scope and intended content of the Climate Change and Sustainable Construction SPD under preparation which is the subject of this SEA/ HRA Screening Report.
- 2.2 It should be noted that the document will not contain any new policies, proposals or site allocations. Nor will it influence or alter the scale or spatial distribution of development across the borough which is already established through the Core Strategy.

Climate Change and Sustainable Construction SPD

- 2.3 The purpose of the Climate Change and Sustainable Construction SPD is to supplement specific policies in the Reigate and Banstead Local Plan Core Strategy (2014, reviewed 2019) and Development Management Plan (DMP) (2019).
- 2.4 The SPD will assist new development to be adaptable to the impacts of climate change and promote sustainable construction and design processes to reduce energy use, waste, pollution, and carbon/greenhouse gas emissions. It will aid landowners, developers, applicants and decision makers in supporting the national ambition of Net Zero Carbon emissions by 2050. In synergy with these objectives, it will also touch upon the development of places to enable healthier lifestyles and homes that are fit for purpose.
- 2.5 Included in the SPD will be guidance on site layout, building design, energy saving measures, sustainable energy sources including renewables and use of local power networks, and infrastructure to support ultra-low emission vehicles. It will provide guidance on how green infrastructure and local ecology networks can be enhanced whilst adapting to climate change, and water conservation in new developments. It will not cover in detail flood mitigation and sustainable urban drainage systems as these are covered by existing guidance. Elements of the advice will extend to respecting the

historic environment. On sustainable construction, the SPD will include guidance on demolition protocols, material selection and reuse, and advice on reducing embodied carbon emissions. Specifically, the SPD will provide further detailed advice and guidance in relation to the following adopted Core Strategy and DMP policies:

Core Strategy Policies	
CS10	Sustainable Development
CS11	Sustainable Construction
CS17	Travel Options and Accessibility

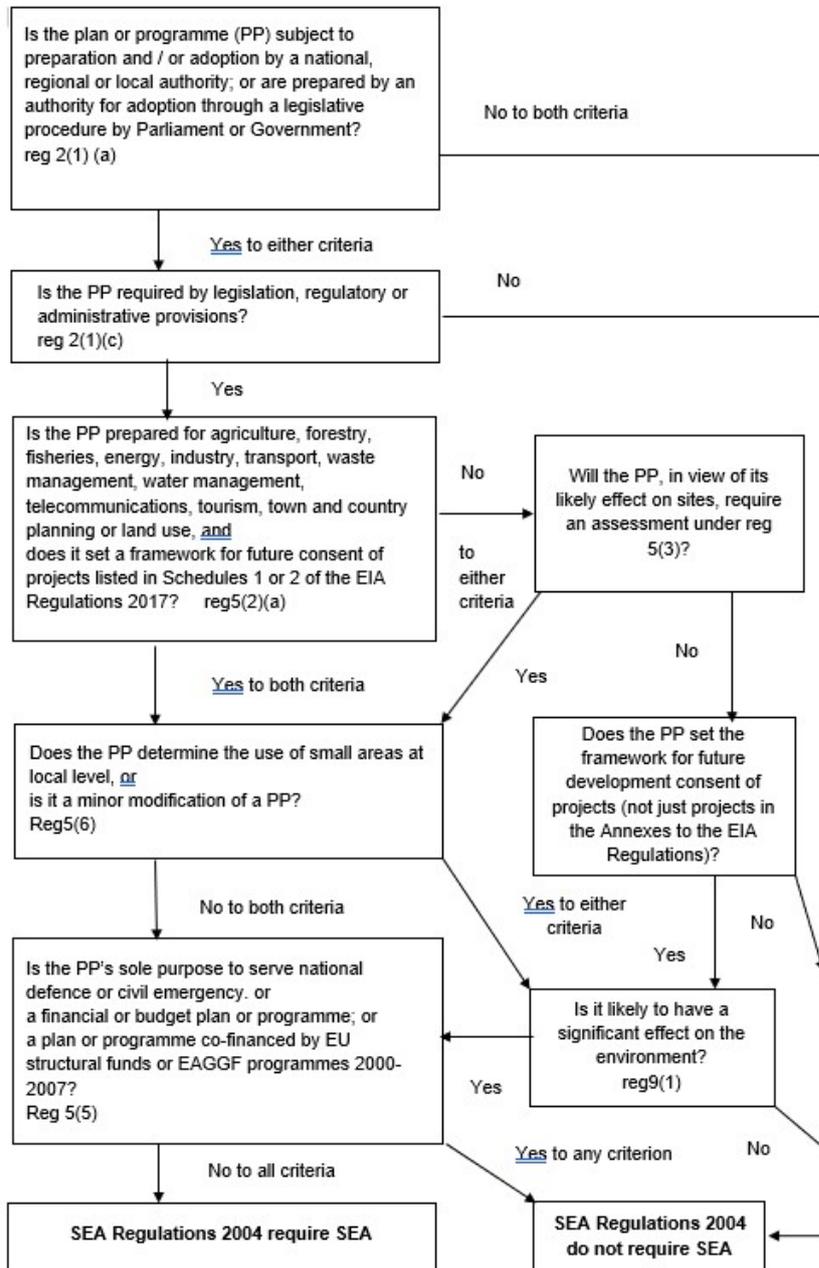
Development Management Plan Policies	
CCF1	Climate Change Mitigation
DES1	Design of New Development
DES5	Delivering High Quality Homes
DES8	Construction Management
NHE4	Green and Blue Infrastructure
NHE5	Heritage Assets
TAP1	Access, Parking and Servicing

3. Strategic Environmental Assessment (SEA)

- 3.1 As discussed in the Introduction above, SEA is required for certain categories of plans and programmes where they are determined to be likely to have significant environmental impacts.
- 3.2 Regarding SPDs, the PPG indicates that SEA will normally only be required in exceptional circumstances. The Council must therefore determine, on a case by case basis, whether SEA is required for the SPD being prepared. This is referred to as a screening process.
- 3.3 As part of this, the Council must first determine whether the SPD is a “plan or programme” covered by Article 3(3) and 3(4). If it determines that it is, then the Council must carry out a screening to establish whether SEA is required. This will depend on its potential to result in significant environmental effects.
- 3.4 In deciding whether significant environmental effects are likely, the Council must take into account the criteria in Schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004, and to consult the specified Consultation Bodies. This process is summarised in **Figure 1** below which is drawn from guidance issued by the ODPM in 2005.
- 3.5 The Council’s assessments of the SPD against Schedule 1 criteria is set out in **Table 1** below.
- 3.6 This Screening Report covers:
 - a. An assessment of whether the SPD is covered by Article 3(3) and Article 3(4)
 - b. An appraisal of the SPD takes account of the criteria in Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004
- 3.7 The three consultation bodies (Historic England, Environment Agency and Natural England) were consulted to determine whether they agreed with the conclusion of this report, in determining whether the SPD has a “significant environmental effect” and required a SEA. They all agreed that the agreed that a SEA was not required. These responses are attached in the Appendices below.
- 3.8 At time of preparing the initial screening, the UK was scheduled to leave the European Union in January 2021. The Environment Bill (currently going through Parliament) does not contain reference to Sustainable Environmental Assessments, but the government remains committed to the sustainability agenda. The White Paper:

Planning for the Future (August 2020) includes an ambition of streamlining the Sustainability Appraisal Process. Other than changes to the consultation requirements during the Covid pandemic, published on 31 December 2020, no further guidance has been received from Government. Potentially a consultation on further changes to the process are due from Government. In the event of new guidance prior to adoption, this document will be amended accordingly.

Figure 1 The Application of the SEA Regulations 2004 to Plans and Programmes



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

Screening Assessment for Climate Change and Sustainable Construction SPD

The SPD is considered to be a plan or programme covered by Articles 3(3) and 3(4)

SCHEDULE 1 – Regulations 9(2)(a) and 10(4)(a)

CRITERIA FOR DETERMINING THE LIKELY SIGNIFICANT EFFECTS ON THE ENVIRONMENT

Table 1 The Characteristics of the Plans and the Programmes

SEA Directive Criteria	Response
<p>1a) The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources.</p>	<p>The SPD will not set a framework for other projects or activities. It will provide additional guidance on existing policies within the Local Plan, including Core Strategy (CS10, CS11 and CS17) and DMP (CCF1, DES1, DES5, DES8, NHE4, NHE9 and TAP1) that have been subject to SEA (concluding no significant effects expected).</p>
<p>1b) The degree to which the plan or programme influences other plans and programmes including those in a hierarchy.</p>	<p>The Core Strategy and DMP provide the adopted policies to which the SPD will supplement. The SPD will only be able to expand and provide more guidance on the policies within the Local Plan. It will not introduce new policy. The SPD will be at the bottom of the hierarchy and will have no influence on the documents above it.</p>
<p>1c) The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development.</p>	<p>The SPD will contribute to sustainable development by providing more detail and guidance to support Local Plan policies, most notably CS10, CS11 and CS17 in the Core Strategy and CCF1, DES1, DES5, DES8, NHE4, NHE9 and TAP1 in the DMP. The aim of the SPD is to support measures which will enable development to mitigate the impacts of climate change, reduce carbon and other harmful emissions, and reduce waste.</p>

SEA Directive Criteria	Response
<p>1d) Environmental problems relevant to the plan or programme.</p>	<p>The policies within the Local Plan that the SPD supplements are not expected to have any likely significant detrimental effects on the environment. Indeed, the SPD will be providing guidance which will seek to improve environmental quality.</p>
<p>1e) The relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste management or water protection).</p>	<p>The SPD will help support the implementation of the Local Plan which in itself is contributing or responding to EU based legislation including:</p> <p>EU Directive 2009/28/EC Energy produced from renewable energy sources</p> <p>EU Directive 2018/844/EU Energy Performance of Buildings</p> <p>EU Directive 2008/98/EC Waste framework directive</p> <p>Commission of the European Communities (2007) Limiting Global Climate Change to two degrees Celsius: The way ahead for 2020 and beyond</p> <p>The Climate Change Act 2008</p> <p>The Climate Change Act 2008 (2050 Target Amendment) Order 2019</p>

Table 2 The Characteristics of the effects and of the area likely to be affected

SEA Directive Criteria	Response
2a) The probability, duration, frequency and reversibility of the effects.	The SPD provides guidance aimed at avoiding or mitigating the negative impact which new developments could have on the environment and encouraging positive change and benefits. It supports delivery of policies within the Local Plan which have already been subject to SA/SEA.
2b) The cumulative nature of the effects.	The Local Plan SA/SEA expects overall positive impacts to arise from Core Strategy policies CS10, CS11 and CS17 and DMP Policies CCF1, DES1, DES5, DES8, NHE4, NHE9 and TAP1. The benefits of these will increase as they are applied to more planning applications.
2c) The trans boundary nature of the effects.	The SPD will be local to Reigate & Banstead and only indirect effects are expected cross-boundary (and not as a result of the SPD in itself).
2d) The risks to human health or the environment (e.g. due to accidents).	The SPD does not present any risks to human health or the environment; conversely, it will encourage improvements in these areas.
2e) The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected).	The SPD will be applied to all relevant planning applications in the borough, although the effects of the SPD will be more likely felt at a more local scale (i.e. by populations in and around the development sites to which the SPD is applied, but also those visiting those areas).

SEA Directive Criteria	Response
<p>2f) The value and vulnerability of the area likely to be affected due to:</p> <ul style="list-style-type: none"> i) special natural characteristics or cultural heritage. ii) exceeded environmental quality standards or limit values. iii) intensive land-use. 	<p>The SPD itself will not be able to set policy related to specific land uses. However, the SPD only offers guidance to support implementation of policies which have already been subject to SA/SEA. It does not propose further or different types of development to those already contemplated through the Local Plan.</p>
<p>2g) The effects on areas or landscapes which have a recognised national, Community or international protection status.</p>	<p>In applying to the borough of Reigate & Banstead, the SPD potentially covers and may be applied to, areas protected for their special natural characteristics such as the Surrey Hills AONB, Mole Gap to Reigate Escarpment SAC and various Conservation Areas. Any applications for development will be required to satisfy the relevant policies for protection of the character of the area before permission is granted.</p>

Conclusions in respect of Strategic Environmental Assessment

3.9 The policies that the SPD will supplement and support the delivery of existing policies in the Council's Local Plan (listed in section 2) have themselves been subject to SEA and SA. In particular, the appraisals for the Core Strategy Policies CS10, CS11 and CS17 and DMP Policies CCF1, DES1, DES5, DES8, NHE4, NHE9 and TAP1 conclude that there will be no significant environmental effects. The SPD will not introduce new policies or proposals, nor will it alter the overall development strategy (scale and distribution) which is established through the higher order Local Plan documents.

3.10 Having reviewed and assessed the SPD being prepared against the relevant criteria and considerations in Schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004 (as set out in above), the Council concludes that the

Climate Change and Sustainable Construction SPD will not give rise to significant environmental effects. **Strategic Environmental Assessment is not therefore required for the Climate Change and Sustainable Construction SPD.**

3.11 This conclusion has been agreed with the Environment Agency, Historic England and Natural England.

4. Habitat Regulation Assessment Screening

- 4.1 The European Directive (92/43/EEC) on the Conservation of Natural Habitats and Wild Flora and Fauna (the 'Habitats Directive') sets out the means to protect habitats and species of European importance through the establishment and conservation of a network of sites known as the 'Natura 2000' network. These include Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). It is also Government policy for sites designated under the Convention on Wetlands of International Importance (Ramsar sites) to be treated as having equivalent status to Natura 2000 sites. These are sites of exceptional importance in respect of rare, endangered or vulnerable natural habitats and species within the European Community. In this report SACs, SPAs and Ramsar sites will be collectively referred to as 'Natura 2000' sites.
- 4.2 The purpose of an HRA is to assess the implications of a plan, both individually, and in combination with other plans or projects, on these Natura 2000 sites. The Habitats Directive applies the precautionary principle to Natura 2000 sites. In normal circumstances, a land use plan can be brought into effect only after having ascertained that it will not adversely affect the integrity of a Natura 2000 site either alone or in combination with other plans.
- 4.3 The first stage in the process is to establish, via screening, whether the plan is either directly connected with, or necessary to, the management of a European site. If not, a determination needs to be made as to whether the plan in itself or in combination with others is likely to have a significant effect on a European site.
- 4.4 A comprehensive Habitats Regulation Assessment (HRA) Appropriate Assessment was undertaken as part of the preparation of these higher order Local Plan documents to determine whether those policies would have likely significant effects. The conclusions of these previous HRAs are considered highly relevant to the screening assessment for the proposed SPD. In relation to the policies which the proposed SPD will implement, the HRA for the Core Strategy and DMP concluded as follows:

Table 3 Conclusions of Core Strategy and DMP HRAs in respect of relevant policies

Policy	HRA Conclusions
Core Strategy Policy CS10 (known as Policy CS8 in the original Core Strategy HRA)	HRA (Feb 2012) concluded that the policy would have no direct implications for recreational disturbance at the SAC and would have no impacts in respect of air quality. HRA noted that the policy would promote preferential use of PDL and encourage a reduction in carbon emissions and the need to travel. Concludes no likely significant effects and no mitigation required.
Core Strategy Policy CS11 (known as Policy CS9 in the original Core Strategy HRA)	HRA (Feb 2012) concluded that the policy would have no direct implications for recreational disturbance at the SAC and would have no impacts in respect of air quality. These proposals should contribute to a reduction in the use of energy, and the increase in more sustainable forms of energy production. The policy will contribute to regional efforts to reduce the trend of increased air pollution.

Policy	HRA Conclusions
<p>Core Strategy Policy CS17 (known as Policy CS15 in the original Core Strategy HRA)</p>	<p>HRA (Feb 2012) concluded that the policy would have no direct implications for recreational disturbance on the SAC. The increased provision of walking, cycling and bridleways will be part of an integrated strategy for increasing GI provision across the borough, for reasons of improving alternatives to car, for fitness, for bio-diversity. It will have the effect of increasing provision in some areas for recreation, therefore contributing to a reduction in the recreational pressure on the SACs.</p> <p>Development will be directed to areas which are most accessible, and this will be away from areas covered by the SAC. Whilst development may lead to more cars on the road, no new roads are planned close to the SAC and therefore it will not become more accessible.</p>
<p>Development Management Policy CCF1</p>	<p>HRA 2018 noted that; ‘This policy guides the detailed design of development rather than the quantum, type or location of development.....tighter water efficiency standards, may help reduce the general requirement for groundwater abstraction by water companies.’</p> <p>HRA Addendum (March 2019) for the DMP Main Modifications also screened out the policy as no material effect on previous HRA/AA conclusions.</p>
<p>Development Management Policy DES1</p>	<p>HRA (Sept 2018) concluded that the then drafted policy had no impact pathways and no HRA/AA implications. The policy was therefore screened out.</p>

Policy	HRA Conclusions
Development Management Policy DES5	HRA (Sept 2018) concluded that the policy had no impact pathways and no HRA/AA implications. The policy was therefore screened out.
Development Management Policy DES8	HRA (Sept 2018) concluded that the policy had no impact pathways and no HRA/AA implications. The policy was therefore screened out.
Development Management Policy NHE4	HRA (Sept 2018) concluded that the policy would have a positive effect as it requires development proposals should avoid adverse impacts on existing habitats, and maintain links and corridors, including for biodiversity. The HRA Addendum (March 2019) for the DMP Main Modifications also screened out the policy as no material effect on previous HRA/AA conclusions.
Development Management Policy NHE9	HRA (Sept 2018) concluded that the then drafted policy had no impact pathways and no HRA/AA implications. The policy was therefore screened out. The HRA Addendum (March 2019) for the DMP Main Modifications also screened out the policy as no material effect on previous HRA/AA conclusions.
Development Management Policy TAP1	HRA 2018 noted that; 'This policy encourages sustainable transport options to reduce the need for travel by private car and encourages infrastructure to support ultra-low emissions vehicles.' The HRA Addendum (March 2019) for the DMP Main Modifications also screened out the policy as no material effect on previous HRA/AA conclusions.

Conclusions in respect of Habitat Regulations Assessment Screening

- 4.5 Previous HRAs have therefore concluded that there were no likely significant effects on European sites, either alone or in combination with other plans and projects, as a result of the policies within the Local Plan which the Climate Change and Sustainable Construction SPD is intended to implement.
- 4.6 Given the proposed SPD is intended to provide supplementary guidance to aid implementation of existing policies in the Local Plan (Core Strategy and DMP) and will not introduce new or amended planning policy, it is concluded that the SPD will not give rise to likely significant effects on any European sites. **It is therefore concluded that a full Appropriate Assessment under the Habitats Regulations is not required for this SPD.**
- 4.7 This conclusion was agreed with the relevant bodies in October 2020. Their responses are included in the Appendices below.

Appendix 1: Responses from the three Statutory Bodies

creating a better place



Environment Agency

Reigate & Banstead Borough Council
Building & Development Services
Town Hall Castlefield Road
Reigate
Surrey
RH2 0SH

Our ref: SL/2011/108875/SE-09/SC1

Your ref: Email

Date: 13 October 2020

LDF@Reigate-Banstead.gov.uk

Dear Sir/Madam

Consultation on Strategic Environmental Assessment and Habitats Regulations Assessment Screening Statement

- **Local Character & Distinctiveness Design Guide SPD**
- **Climate Change and Sustainable Construction SPD**

Thank you for consulting the Environment Agency on the above. We are in agreement with your conclusion that the Local Character and Distinctiveness Design Guide SPD and Climate Change and Sustainable Construction SPD are unlikely to have any significant environmental effects and therefore a full Strategic Environmental Assessment will not be required.

We agree that the proposed SPDs are intended to provide supplementary guidance to aid implementation of existing policies in the local plan and will not introduce new or amended planning policy and therefore will not give rise to significant effects on the environment.

Please do not hesitate to contact me should you wish to discuss this further.

Yours faithfully,

[Redacted]
Planning Specialist

Kent and South London
[Redacted]

Environment Agency
3rd Floor, Seacole Building, 2 Marsham Street, London, SW1P 4DF
Telephone: 03708 506 506
Email: enquiries@environment-agency.gov.uk
Website: www.gov.uk/environment-agency



INVESTOR IN PEOPLE



Planning Policy Team
Reigate & Banstead Borough Council
Reigate Town Hall, Castlefield Road
Reigate, Surrey RH2 0SH

Our ref: PL00714762
Your ref:
Telephone 020 7973 3700
Email e-seast@historicengland.org.uk

[By email only to LDF@Reigate-Banstead.gov.uk](mailto:LDF@Reigate-Banstead.gov.uk)

Date 14 October 2020

Dear Sir or Madam

Reigate and Banstead Borough Council Climate Change and Sustainable Construction
SPD Strategic Environmental Appraisal Screening Opinion

Thank you for your email dated 9 September 2020 consulting Historic England on your intention of carrying out a SEA for the above plan.

In light of the Environmental Assessment of Plans and Programmes Regulations 2004, our view is that a SEA is not required in this instance for the reason set out in Paragraph 3.10 of the Screening Statement.

Yours sincerely


Historic Environment Planning Adviser



Historic England, 4th Floor, The Atrium, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA
Telephone 020 7973 3700 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.
Correspondence or Information which you send us may therefore become publicly available.



Date: 25 September 2020
Our ref: 327413
Your ref: [Click here to enter text.](#)

LDF@Reigate-Banstead.gov.uk

BY EMAIL ONLY



Customer Services
Hombeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Sir/Madam,

Planning consultation: Reigate and Banstead Local Plan - Climate Change and Sustainable Construction SPD - SEA & HRA Screening Consultation Request
Location: Reigate and Banstead

Thank you for your consultation on the above dated 09 September 2020 which was received by Natural England on 10 September 2020

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

SUMMARY OF NATURAL ENGLAND'S ADVICE

NO COMMENTS

Having reviewed the Council's Draft Screening Statement we have not identified any likely significant effects of the proposed SPD on any of the environmental features for which Natural England has statutory duties and responsibilities including the Mole Gap to Reigate Escarpment SAC and the Surrey Hills AONB and therefore has no comments to make.

Background

The Council's Screening Assessment (September 2020) concludes that a SEA is not required for the Climate Change and Sustainable Construction SPD. It also concludes that the Climate Change and Sustainable Construction SPD would not need to be subject to full Appropriate Assessment under the Habitats Regulations Assessment. The Council has consulted Natural England to seek comments on this assessment and its conclusions. For the purposes of Regulation 9 of The Environmental Assessment of Plans and Programmes Regulations 2004, Natural England is defined as a consultation body. Natural England is also the appropriate nature conservation body for the purposes of the Conservation of Habitats and Species Regulations, 2017 (the Habitats Regulations).

It is not the role of Natural England to advise the local planning authority on whether a SA/SEA is required and that is a matter for the local planning authority to determine. Under Regulation 105 of the Habitats Regulations Natural England does have a duty to advise a local planning authority if a Habitats Regulations Assessment (HRA) of a plan is required where we believe it is likely to have

significant effects alone or in combination with other plans and project on European protected sites.

In reviewing the Council's Screening Statement (September 2020), and coming to our views, we have noted in particular that:

1. This SPD will provide additional guidance to support implementation of policies in the Council's adopted Local Plan: Core Strategy (adopted 2014, reviewed 2019) and Development Management Plan (adopted 2019). Upon adoption, the SPD will be a material consideration in planning determinations in the borough.
2. The SPD will not set a framework for other projects or activities. It will provide additional guidance on existing policies within the Local Plan, including Core Strategy (CS10, CS11 and CS17) and DMP (CCF1, DES1, DES5, DES8, NHE4, NHE9 and TAP1) that have been subject to SEA (concluding no significant effects expected).
3. The Core Strategy and DMP provide the adopted policies to which the SPD will supplement. The SPD will only be able to expand and provide more guidance on the policies within the Local Plan. It will not introduce new policy. The SPD will be at the bottom of the hierarchy and will have no influence on the documents above it.
4. The policies within the Local Plan that the SPD supplements are not expected to have any likely significant detrimental effects on the environment. Indeed, the SPD will be providing guidance which will seek to improve environmental quality.

Should the proposal change, please consult us again.

If you have any queries relating to the advice in this letter please contact me on [REDACTED]

Yours faithfully

[REDACTED], Sustainable Development, Thames Solent Area