

Strategic Environmental Assessment (SEA) for the Guildford Local Plan: SEA Scoping Note

What is the Guildford Local Plan?

Guildford Borough Council is commencing work on a new Local Plan under the new Local Plan making system, as set out in The Town and Country Planning (Local Planning) (England) Regulations 2026¹. The new Local Plan making system covers plans prepared and adopted under the Planning and Compulsory Purchase Act 2004, as amended by the Levelling-Up and Regeneration Act 2023.

The new Local Plan will set out the spatial strategy, site allocations, and planning policies to guide development across the borough up to 2045 and (once adopted) will replace the existing Guildford Local Plan Strategy and Sites (LPSS, April 2019) and Guildford Local Plan Development Management Policies (LPDMP, March 2023). It will provide a comprehensive framework for delivering sustainable and well-designed growth, housing, employment, infrastructure, and environmental protection in line with national policy.

AECOM has been commissioned to undertake an independent SEA (incorporating Sustainability Appraisal (SA)) in support of the new Local Plan. An SEA Scoping Report has been prepared and consulted upon and should be read alongside this SEA Scoping Note.

What is SEA scoping?

SEA is a mechanism for assessing the likely significant environmental effects of plan and programmes before they are adopted. In England, SEA is required under the Environmental Assessment of Plan and Programmes (England) Regulations 2004 ('the SEA Regulations')², which transposes into national law the EU Strategic Environmental Assessment (SEA) Directive.

In line with the SEA Regulations, there are two key stages for the SEA:

1. When deciding on '*the scope and level of detail of the information*' which must be included in the Environmental Report there is a consultation with nationally designated authorities concerned with environmental issues; and
2. A report (the 'Environmental Report') is published for consultation alongside the proposed local plan (i.e., the 'draft plan') which presents an assessment of the draft plan and discusses 'likely significant effects' that would result from plan implementation and reasonable alternatives.

SEA scoping is associated with stage 1 and is explored and presented under a series of themes which reflect a broad understanding of the anticipated scope of plan effects. The selected SEA themes incorporate the 'SEA topics' suggested by Schedule 2(6) of the SEA Regulations. Within the SEA Scoping Report, themes are grouped under four headings which address key areas of sustainable development

¹ UK Government (2026). 'The Town and Country Planning (Local Planning) (England) Regulations 2026' can be accessed through [this link](#).

² UK Government (2004). 'The Environmental Assessment of Plans and Programmes Regulations 2004' can be accessed through [this link](#).

for the borough (and plan making): Society; Environment; Economy, and Infrastructure. The themes are as follows:

Society

- Communities.
- Health; and
- Homes.

Environment

- Historic Environment.
- Climate Change Mitigation.
- Climate Change Adaptation.
- Air Quality and Noise.
- Land and Resources.
- Water.
- Biodiversity; and
- Landscape and Townscape.

Economy

- Economy.

Infrastructure

- Transport; and
- Access to Community Infrastructure.

Developing the draft scope for the SEA (incorporating SA) of the new Local Plan has involved the following steps:

- Exploring the policy context for the new Local Plan and SEA to summarise the key messages arising.
- Establishing the baseline for the SEA (i.e., the current and future situation in the area in the absence of the new Local Plan) to help identify the key sustainability issues and opportunities for plan making; and
- Considering this information, developing an SEA Framework comprising SEA objectives and assessment questions, which can then be used as a guiding framework for the subsequent assessment.

The discussion of the scoping information for each theme is presented in **Chapters 7 to 20** in the main body of the SEA Scoping Report, and the proposed SEA Framework is brought together as a whole in **Chapter 21**. Each proposal within the new Local Plan will be assessed consistently using this Framework.

The discussion of the scoping information for each theme is informed by details of the policy context for the new Local Plan (see **Appendix A** in the main body of the SEA Scoping Report). Specifically, the new Local Plan's relationship to relevant policies, plans, and programmes.

Who should be consulted at the SEA scoping stage?

A key procedural requirement of the SEA Regulations is to present a scope for the SEA, so that the statutory bodies can provide timely comment.

There is not an explicit expectation under Regulation 20(1) within the 2026 Regulations that SEA Scoping should take place at the same time as the Local Plan Scoping Consultation stage, with the wording inviting consultees to comment on “*such matters relevant to the preparation of the local plan as the authority or body consider appropriate*”. The SEA Regulations 12(5) and 12(6) are also not specific on timings for SEA Scoping, highlighting only that consultation should be undertaken for a period of five weeks. In this respect, the Regulations provide an element of flexibility, with professional judgement applied to ensure that SEA Scoping consultation is completed at an appropriate time during the plan making process.

Public involvement through consultation is a key element of the SEA process. However, at the SEA Scoping stage, the SEA Regulations require consultation with statutory bodies but not full consultation with the public. The statutory bodies are Historic England, Natural England, and the Environment Agency.

The SEA Scoping Report was released to the three statutory bodies for a period of five weeks between 5th June 2026 and 10th July 2026³. Consultees were invited to comment on the content of the SEA Scoping Report, particularly the evidence base for the SEA, the identified key sustainability issues, and the proposed SEA Framework of objectives and assessment questions. Responses were received from all three statutory bodies. A summary of the responses, and how they will inform the next stages of the SEA process (and plan making), is provided below.

Consultation Response	How the response has been considered and addressed
Historic England	
<i>Response received from Historic Environment Planning Adviser on 6th July 2026</i>	
Historic England is a statutory consultation body in relation to the SEA Directive in regard to any matters affecting the historic environment.	Comment noted. The consideration of likely significant effects to the historic environment from emerging Local Plan policies and proposals will be a key consideration for the SEA.
We are content that the scoping report for Guildford draft local plan adequately covers the issues that may arise in respect of the potential effects of proposed development sites on heritage assets.	
Historic England has prepared generic guidance with regards to our involvement in the various stages of the local plan process which you may find helpful in preparing the Sustainability Appraisal. This is available to download via this link: SA and SEA Historic England Advice Note 8 (December 2016)	Comment noted. The recommended guidance note will be a useful source of reference throughout the SEA process.
This opinion is based on the information provided by you and for the avoidance of doubt does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this or later versions of the plan which is the subject to consultation, and which may, despite the SEA, have adverse effects on the historic environment.	Comment noted. We welcome comments from Historic England on SEA reports accompany future consultations (expected at Reg 23 and Reg 27).

³ The period was extended to enable consultation responses to be received from all three bodies.

Consultation Response

How the response has been considered and addressed

Natural England

Response received from Sustainable Development Higher Officer on 10th July 2026

We welcome the key issues identified within the report and support the SEA objectives within the framework as they aptly cover our interests in the natural environment.

Comment noted.

Key Sustainability Issues

Comment noted.

Biodiversity: We welcome reference to the restoration or enhancement of biodiversity, in line with the National Planning Policy Framework.

Key Sustainability Issues

Comment noted. Natural England's Green Infrastructure Framework has subsequently been referenced within the SEA Framework questions under the 'Communities' and 'Health' themes.

Health and Access to Community Infrastructure: We welcome reference to improving people's access to nature (be that to linear routes or open space). We support improving the provision and accessibility of open greenspace and green infrastructure and suggest referring to Natural England's [Green Infrastructure Framework](#) when appraising options.

Key Sustainability Issues

Comment noted. The extent to which the new Local Plan encourages opportunities to deliver NbS through new development areas will be explored through the SEA, primarily within the 'Climate Change Adaptation' theme.

Climate Change: We welcome reference to both mitigation of, and adaptation to, climate change. In particular, we support the inclusion of nature-based solutions (NbS) in the plan to address specific regional climate risks and ecosystem vulnerabilities. This should consider the restoration of natural processes and the avoidance of action that further degrades or constrains the natural environment's ability to respond to the effects of climate change.

Plans and Programmes

Comment noted. The relevant policies, plans, and strategies in Appendix A will be reviewed and considered during the SEA process where appropriate to reflect the latest context, with reference to Natural England's suggested considerations.

Natural England has not reviewed the plans listed. However, we advise that the following types of plans relating to the natural environment should be considered where applicable to your plan area: Green infrastructure strategies; Biodiversity plans; Rights of Way Improvement Plans; River basin management plans; AONB and National Park management plans; and relevant landscape plans and strategies.

Local Plan Evidence on the Natural Environment

Comment noted. The recommended annex will be a useful source of reference throughout the SEA process.

Please see attached annex for our advice on sources of local plan evidence on the natural environment.

Indicators

Comment noted. The effectiveness of the policies and proposals within the new Local Plan will be monitored by GBC.

As set out in Planning Practice Guidance, you should be monitoring the significant environmental effects of implementing the current local plan. This should include indicators for monitoring the effects of the plan on biodiversity (NPPF para 117).

Indicators

Comment noted. The proposed monitoring framework will likely consider the extent to which the strategy, vision and objectives

The natural environment metrics in the baseline information are largely driven by factors other than the plan's performance. They

Consultation Response**How the response has been considered and addressed**

are thus likely to be of little value in monitoring the performance of the Plan.

It is important that any monitoring indicators relate to the effects of the plan itself, not wider changes. Bespoke indicators should be chosen relating to the outcomes of development management decisions.

are being achieved, and any likely significant effects identified through the SEA are being mitigated. Bespoke indicators and targets will likely be identified.

Potential Indicators: Biodiversity

- Number of planning approvals that generated any adverse impacts on sites of acknowledged biodiversity importance.
- Percentage of major developments generating overall biodiversity enhancement.
- Hectares of biodiversity habitat delivered through strategic site allocations.

The potential indicators have been noted by GBC for later plan making stages. With respect to the SEA, indicators should focus on those aspects of the environment that are likely to be negatively impacted upon, where the impact is uncertain or where particular opportunities for improvement might arise.

Potential Indicators: Landscape

- Amount of new development in AONB/National Park/Heritage Coast with commentary on likely impact.

As above.

Potential Indicators: Green Infrastructure

- Percentage of the city's population having access to a natural greenspace within 400 metres of their home.
- Length of greenways constructed.
- Hectares of accessible open space per 1000 population.

As above.

Environment Agency*Response received from Planning Specialist (Sustainable Places) on 22nd July 2026**Identifying other relevant plans, programmes and environmental protection objectives*

We note the list in Appendix A of relevant Policies, Plans and Programmes (and in Section 11, 12, 14 and 15) and consider it satisfactory. Guildford Borough Council (GBC) would need to update the Strategic Flood Risk Assessment (SFRA) and Water Cycle Study (WCS) evidence base to help the LPA understand the impact of planned growth in GBC on flood risk, water quality and resources.

Comment noted. GBC highlight that the guidance will be considered as part of plan preparation and its accompanying evidence base.

We suggest the following are added to the list under 'National' as they are relevant to the preparation of the local plan.

- Environment Agency [SFRA Guidance](#) [SEA topics - Climate change adaptation and mitigation]
- [Flood Risk Regulations 2009](#) [SEA topic - Climate change adaptation and mitigation]
- Strategic flood risk assessment [good practice guide](#) [SEA topics - Climate change adaptation and mitigation]
- [Water cycle studies](#) guidance [SEA topic - Water]
- The Environment Agency's [approach to groundwater protection](#) (publishing.service.gov.uk) [SEA topics -Water and /or Land and resources].

Consultation Response**How the response has been considered and addressed***Collecting baseline information*

We support the fact that the council is seeking to update the Level 1 and Level 2 SFRA as stated in paragraph 12.2.8 (under the Climate change adaptation SEA topic). We encourage the LPA to engage with the Environment Agency regarding the update as well as using the best available flood risk information and data for the updates.

Comment noted. GBC acknowledge the Environment Agency's offer of support with the SFRA evidence, utilising the latest available data.

Collecting baseline information

Through our regulatory responsibilities, the Environment Agency is aware that a few Sewage Treatment Works (STW) including Ripley and Woking and Camberley which serve Guildford Borough are not complying with its current permit limits.

Upgrades and/or improvements are need or must be undertaken to make the STW fit for purpose. Any development connecting to these STWs may lead to further deterioration of the water environment i.e. Wey ([Shalford to River Thames confluence at Weybridge](#)) and Blackwater ([Hawley to Whitewater confluence at Bramshill](#)) respectively and as national policy advises against this, it would impact on growth in Guildford Borough.

Comment noted. The potential impacts to the water environment associated with emerging Local Plan policies and proposals will be considered under the 'Water' theme and accompanying evidence base prepared to support the Local Plan.

Collecting baseline information

A Water Cycle Study (WCS) is required as it would provide the evidence that the LPA requires to inform growth in Guildford Borough. The WCS will help the LPA understand the impact of growth on the water environment in respect to wastewater discharges, water resources, and ensuring water quality. This should be reflected in the report under SEA topic – Water.

We are happy to support the LPA to produce/update the SFRA and WCS evidence base documents and encourage Guildford Borough Council (GBC) to contact the Environment Agency for specific data and information required to help the LPA produce the evidence base documents.

Comment noted. GBC are in the process of commissioning a WCS.

GBC acknowledge the Environment Agency's offer of support with the SFRA and WCS evidence, alongside the recommended guidance.

Identifying sustainability problems and key issues

We consider the environmental problems described in Environment Section (i.e. Climate change mitigation and adaptation, Land and resources, Water and Biodiversity) generally highlight the main issues of relevance for the SEA topics within our remit.

The key environmental issues and trends which characterise GBC appear to be highlighted.

Comment noted. The topics listed by the Environment Agency are captured within the SEA Scoping Report.

Preparing / Developing the SEA Framework

The 'SEA objectives and corresponding guide questions that will help guide the appraisal of emerging Local Plan options and policies', appear reasonable. We make the following suggestions.

Under SEA topic – Land and resources (also in Table 16), the following question should be included in the list of guide questions. 8h. Does the plan actively seek the remediation of contaminated land to prevent pollution of water resources prior to development?

Comment noted. SEA Framework question 8h and SEA objective 9 have been amended to reflect the Environment Agency's suggested wording.

Consultation Response**How the response has been considered and addressed**

Under SEA topic – Water (also in Table 19), the SEA objective 9 should be amended to read; ‘Protect and enhance the water environment and manage water resources efficiently to ensure water quality and water supply respectively, to reduce pollution risks and support current and future needs.

Appraisal of alternatives

Reasonable alternatives should be considered as part of the Plan preparation; these should be assessed as part of the SEA process and the findings of their assessment should inform the choice of the preferred option. This should be documented in the Environmental Report. Such alternatives may for example include alternative strategic directions, policies or proposals that are being considered as part of the plan-making process.

The process of identifying and assessing alternatives is an integral component of SEA and provides significant potential to think creatively and improve the environmental performance of the plan. It is, therefore, important for alternatives to be considered from an early stage in the process.

The diagram in Table 14 in Annex 5 of [A Practical Guide to the Strategic Environmental Assessment Directive](#) (publishing.service.gov.uk) contains further advice on developing and assessing alternatives.

Comment noted. The approach taken to define and appraise reasonable alternatives (and the appraisal findings) will be presented in SEA reports accompanying future consultations (expected at Reg 23 and Reg 27).

The appraisal of reasonable alternatives will be revisited and updated through the process (where appropriate) to demonstrate how the SEA has proactively informed and responded to plan making as it has evolved.

What are the next steps for plan making / SEA?

The new plan-making system has a clear sequencing of tasks which are organised under a series of 'Gateways'. Before the 30-month process starts (i.e., before passing through Gateway 1), the following tasks must be completed:

- Local authority publishes their local plan timetable and gives at least four-months' notice of their intention to commence plan-making. Guildford Borough Council published their timetable on 5th June 2026, along with their notice to commence plan-making in line with Regulation 19(1) of The Town and Country Planning (Local Planning) (England) Regulations 2026.
- Confirm requirement for SEA and gather baseline information, knowledge and understanding about the local plan area. Consultation on the SEA Scoping Report ran for a period of five weeks between 5th June 2026 and 10th July 2026.
- Run a scoping consultation to engage with the public, statutory bodies and other stakeholders to invite feedback on the plan-making process and what the emerging plan should contain. Consultation on the scope of the new Local Plan commenced for a period of six weeks from 2nd September 2026, accompanied by the final version of the SEA Scoping Report and this SEA Scoping Note.
- Complete and publish a self-assessment and pass through Gateway 1, commencing the 30-month process by 31st October 2026.