

Cranleigh Neighbourhood Plan

Habitats Regulations Assessment (HRA)

Screening Statement – Determination under Regulation 105 & 106 of the Conservation of Habitats and Species Regulations 2017

May 2020

Prepared by

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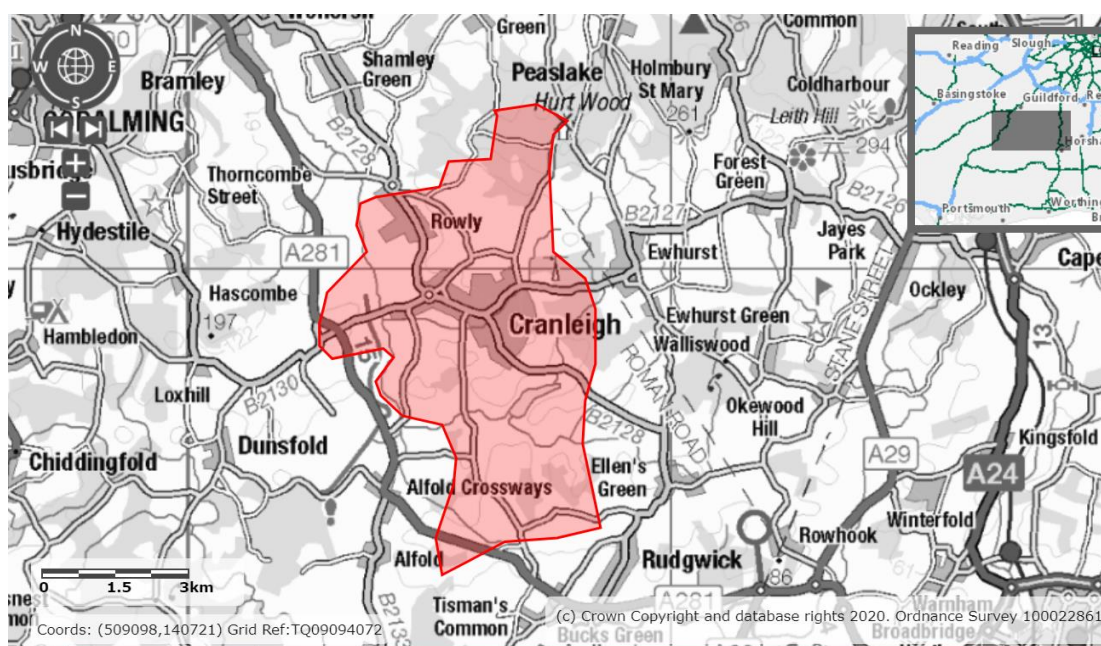
Introduction

- 1.1. This Habitats Regulations Assessment (HRA) screening determination has been undertaken by Base Planning and Design Ltd on behalf of Waverley Borough Council in their duty to determine whether the Cranleigh Neighbourhood Plan requires an Appropriate Assessment. This screening assessment is based on the Regulation 16 Neighbourhood Plan dated September 2019 and submitted for examination.
- 1.2. In accordance with Article 6 of the Habitats Directive (92/43/EEC) and Regulation 105 of the Conservation of Habitats & Species Regulations 2017, the Borough Council is the competent authority for determining if a plan requires Appropriate Assessment.

Background to the Cranleigh Neighbourhood Plan

- 1.3. The Neighbourhood Planning (General) Regulations (2012) make provision for Parish Councils or Neighbourhood Forums to prepare Neighbourhood Plans. Whilst not forming part of a local authority's Local Plan, Neighbourhood Plans do form part of the Development Plan for an area as set out in Section 38 of the Planning & Compulsory Purchase Act 2004 (as amended). As such, Neighbourhood Plans are a material consideration in taking planning decisions and can contain policies on a range of issues including the allocation of sites/land for development.
- 1.4. The proposed Cranleigh Neighbourhood Plan covers all of the area within the jurisdiction of Cranleigh Parish Council. The Neighbourhood Plan Area lies to the east of Godalming and south of Guildford in Surrey and west of Horsham and Crawley in Sussex. The plan area contains the village of Cranleigh and the small settlement of Rowley just to the north west of Cranleigh and within the designated Green Belt. The area is predominantly rural, characterised by agricultural field patterns, small wooded copses as well the larger Winterfold Wood to the north of the area, Smithwood Common to the north west and Cranleigh Golf & County Club to the north east of Cranleigh Village. A plan of the designated area is shown in Plan 1-1.

Plan 1-1: Map of the Designated Area for the Cranleigh Neighbourhood Plan



- 1.5. There are numerous areas of woodland/copses designated as ancient/semi-natural or ancient replanted woodland which are also identified as priority habitat (deciduous woodland and traditional orchards) as well as three areas of woodpasture and parkland which is a national Biodiversity Action Plan (BAP) designation. Priority habitat designations also include lowland heathland. Protected species include Brown hairstreak (butterfly) and lapwing as well as European protected species of bat and great crested newts. There are no SSSIs located in the Neighbourhood Plan area.
- 1.6. The Neighbourhood Plan area lies within 7.8km of The Mens SAC, 8.5km of the Ebernoe SAC, 8.5km of the Wealden Heaths Phase I SPA (including the Thursley, Ash, Pirbright & Chobham SAC, Thursley, Hankley & Frensham Commons SPA and Thursley & Ockley Bog Ramsar. The Neighbourhood Plan area is also 11.6km from the Thames Basin Heaths SPA, 11.9km from the Mole Gap to Reigate Escarpment SAC, 12.6km from the Wealden Heaths Phase II SPA and 2km from Woolmer Forest SAC.
- 1.7. The Cranleigh Woods Biodiversity Opportunity Area (BOA)¹ also lies within the Neighbourhood Plan area and includes the largely wooded farmland between Cranleigh and Ewhurst. The Neighbourhood Plan area also lies within the Surrey Hills Area of Outstanding Natural Beauty (AONB) and a designated Area of Great Landscape Value.
- 1.8. The submission Cranleigh Neighbourhood Plan dated September 2019 sets out the vision for the Neighbourhood Plan area which is:-

¹ Biodiversity Opportunity Areas: the basis for realising Surrey's ecological network (2019) Surrey Nature Partnership. Available at: <https://surreynaturepartnership.org.uk/our-work/>

'In 2032, Cranleigh will have maintained its village character, whilst adapting to the needs of a diverse and growing community with well-designed, sympathetic development and protected green spaces'.

- 1.9 The submission Neighbourhood Plan also contains 16 objectives under the headings Housing & Design, Employment, Environment, Community Leisure & Wellbeing and Infrastructure.
- 1.10 The Cranleigh submission Neighbourhood Plan dated September 2019 contains a total of 24 policies covering a range of issues such as housing, employment, infrastructure, transport, local green space, heritage, design and the natural environment. The Neighbourhood Plan reviews and amends settlement boundaries with Policy CRAN1 setting out the principles for the location of development and policies CRAN2 to CRAN4 proposing a number of housing allocations which amount to around 110 dwellings which are not allocated in the Waverley Part 1 Local Plan. The allocations would also result in a housing requirement some 28 dwellings above that set out in the Waverley Part 1 Local Plan for Cranleigh when taking account of completions, permissions, windfalls and allocations set out in the Part 1 Local Plan.
- 1.11 Neighbourhood Plan Policy CRAN12 seeks to maintain and enhance the natural environment, including maintaining and enhancing on-site biodiversity assets, provide for wildlife needs on-site and where possible for major developments to demonstrate biodiversity net gains. Policy CRAN13 sets out that development should not cause unacceptable risks to air quality, seek opportunities to improve air quality and major development to assess impact on air quality and provide appropriate mitigation. CRAN14 seeks to protect water quality, CRAN15 to protect soil quality and CRAN20 to minimise the need for car use.
- 1.12 The adopted Waverley Part 1 Local Plan contains the following objective:
'To protect and enhance Waverley's biodiversity, including its wildlife species and their habitats, both on designated sites such as the Thames Basin Heaths and Wealden Heaths (Phases 1 and 2) Special Protection Areas'
- 1.13 The Spatial Strategy of the Part 1 Local Plan focuses development in and around the Borough's four largest settlements which includes the village of Cranleigh. The Part 1 Local Plan sets a housing requirement over the Plan period (2013-2032) of 11,210 dwellings with a requirement for Cranleigh of 1,700 dwellings and allocates the strategic sites of Land at Horsham Road for 250 dwellings and Land South of Elmbridge Road & The High Street for 765 dwellings.
- 1.14 The Part 1 Local Plan also contains a number of other general policies covering design, transport and protection of the natural and historic environments and these have been taken into account in the submission Neighbourhood Plan. The Part 2 Local Plan is currently at the preferred options stage of preparation and does not propose allocating any sites identified in the submission Neighbourhood Plan.
- 1.15 The Part 1 Local Plan has been the subject of Sustainability Appraisal (including the requirements for Strategic Environmental Assessment) as well as Habitats Regulations Assessment (HRA).
- 1.16 The HRA accompanying the adopted Part 1 Local Plan identifies a number of potential impact pathways including urbanisation, recreational pressure, atmospheric pollution, water abstraction and water quality to the following European Sites:

- Wealden Heaths Phase I (Thursley, Hankley & Frensham Commons SPA, Thursley, Ash, Pirbright & Chobham SAC and Thursley & Ockley Bogs Ramsar)
 - Thames Basin Heaths SPA
 - Wealden Heaths Phase II
- 1.17 The Part 1 Local Plan HRA also considers a number of European sites which sit outside of the Local Plan boundary. The HRA found that most of the European Sites lying outside of the Local Plan area could be screened out with no likely significant effects and as such there is no reason to depart from that finding in this HRA screening. However the HRA could not conclude that no likely significant effects would exist without mitigation for the following:
- Recreational Pressure on Mole Gap to Reigate Escarpment SAC, Ebernoe Common SAC and The Mens SAC; and
 - Atmospheric Pollution on Butser Hill SAC, Mole Gap to Reigate Escarpment SAC, and on Woolmer Forest SAC;
- 1.18 Further, the sites proposed for allocation in the submission Neighbourhood Plan have not been the subject of HRA at any stage. In this respect the proposed allocation sites lie 11.5km from the Wealden Heaths Phase I SPA which incorporates the Thursley, Ash, Pirbright & Chobham SAC, Thursley, Hankley and Frensham Commons SPA and the Hankley & Ockley Bog Ramsar. 15.5km from the Wealden Heaths Phase II SPA, 12.6km from the Ebernoe Common SAC, 13km from The Mens SAC, 24km from Woolmer Forest SAC, 15km from the Thames Basin Heaths SPA, 15.5km to the Mole Gap to Reigate Escarpment SAC and 38km from the Butser Hill SAC.

Habitats Regulations Assessment (HRA) – Screening

- 1.19 The need to undertake an Appropriate Assessment as part of an HRA is set out within the EC Habitats Directive 92/43/EEC and transposed into British Law by Regulation 105 of the Conservation of Habitats and Species Regulations 2017. The Appropriate Assessment stage of HRA is only required should the preliminary screening assessment not be able to rule out likely significant effects.
- 1.20 The European Habitats Directive requires that any plan or project likely to have a significant effect on a European site must be subject to an Appropriate Assessment. Schedule 2 of the Neighbourhood Planning (General) Regulations 2012 sets out a general presumption that Neighbourhood Plans are not likely to have a significant effect on European sites. Schedule 2 also amends the Conservation of Habitats and Species Regulations 2010 (now the 2017 Regulations) so as to apply its provisions to neighbourhood development orders and neighbourhood plans. It also inserts new regulation 78A (now Regulation 81) which provides that a neighbourhood development order may not grant planning permission for development which is likely to have a significant effect on a European site and Regulation 102 (now Regulation 106) deals with Neighbourhood Plans.
- 1.21 Whilst Schedule 2 of the Neighbourhood Planning (General) Regulations 2012 set out a general presumption that an HRA is unlikely to be required, it is still necessary to carry out a screening assessment.
- 1.22 The Habitats Directive states that any plan or project not connected to or necessary for a site's management, but likely to have significant effects thereon shall be subject

to appropriate assessment. There are four distinct stages in HRA namely: -

Step 1: Screening – Identification of likely impacts on a European site either alone or in combination with other plans/projects and consideration of whether these are significant. Following the decision of the ECJ in the People Over Wind & Sweetman v. Coillite Teoranta (C-323/17) case, avoidance and/or mitigation measures cannot be taken into account at the screening stage and it is purely an exercise to determine if possible pathways for effect exist and whether these can be ruled out taking account of the precautionary principle. It is the opinion of this HRA screening assessment that adopted policies of the current development plan and submission policies in the Neighbourhood Plan act as avoidance/mitigation and cannot be taken into account at this stage of HRA. Similarly any HRA undertaken for other development plan documents which have not been through Examination in Public (EiP) and found sound should only be given limited weight.

Step 2: Appropriate Assessment – consideration of the impact on the integrity of the European Site whether alone or in combination with other plans or projects with respect to the sites structure, function and conservation objectives. Where there are significant effects, step 2 should consider potential mitigation measures.

Step 3: Assessment of Alternative Solutions – Assessing alternative ways of achieving the objectives of the plan/project which avoid impacts; and

Step 4: Assessment of Compensatory Measures – Identification of compensatory measures should impact not be avoided and no alternative solutions exist and an assessment of imperative reasons of overriding public interest (IROPI) deems that a project should proceed.

- 1.23 Should step 1 reveal that significant effects are likely or effect cannot be discounted because of uncertainty, then it is necessary to move onto step 2: Appropriate Assessment. If step 2 cannot rule out significant effect even with mitigation, then the process moves onto step 3 and finally step 4 if no alternative solutions arise.

Step 1 - Screening

- 1.24 There are four stages to consider in a screening exercise: -

Stage 1: Determining whether the plan/project is directly connected with or necessary to the management of the site;

Stage 2: Describing the plan/project and description of other plan/projects that have the potential for in-combination impacts;

Stage 3: Identifying potential effects on the European site(s); and

Stage 4: Assessing the significance of any effects

Stage 1

- 1.25 It can be determined that the Cranleigh Neighbourhood Plan is not directly connected with or necessary to the management of a European site.

Stage 2

- 1.26 Information about the Neighbourhood Plan can be found in paragraphs 1.3 to 1.11 of this screening assessment. Table 1-1 lists those other plans and projects, which may have in-combination impacts.

Table 1-1: Other Key Plans/Projects

<p>Plan/ Project</p>	<p>National Planning Policy Framework (2019): High level national planning policy covering topics such as housing, economy, employment, retail as well as biodiversity, flood risk and heritage.</p> <p>South East Plan 2009: Saved Policy NRM6 sets out protection for the Thames Basin Heaths SPA.</p> <p>Waverley Local Plan Part 1 2013-2032: Sets policies for the consideration of development and the spatial strategy for the Borough including provision of 11,210 dwellings with 1,700 at Cranleigh.</p> <p>Waverley Local Plan Part 2 (Preferred Options): Includes a number of development management policies and sites allocated for development.</p> <p>Other Local Authority Local Plans within 10km or adjoining sites: Housing target for areas around European sites set out in Table 1-2.</p> <p>Large Scale Projects within 10km or adjoining European Sites: Large scale projects within 10km are subsumed in the consideration of 'Other Local Authority Local Plans' above.</p> <p>Thames Basin Heaths Joint Delivery Framework 2009: Sets out the agreed Framework regarding the approach and standards for avoiding significant effects on the Thames Basin Heaths SPA.</p> <p>Environment Agency, Thames River Basin District Management Plan (2015): Sets out actions to improve water quality. Future aims for the River Wey include implementing Lower Wey Oxbow Restoration Project to enhance and restore the main Wey river channel and Wey Diffuse Advice Project throughout the catchment.</p> <p>Environment Agency, Thames Catchment Flood Management Plan (2009): Aim is to promote more sustainable approaches to managing flood risk. Will be delivered through a combination of different approaches.</p> <p>Environment Agency, River Wey Catchment Abstraction Management Strategy (2019): identifies the Wey having restricted 'Water available for licensing'.</p> <p>Environment Agency, Water Resources Strategy: Regional Action Plan for Thames Region (2009): Key priorities for Thames region include ensuring sufficient water resources are available, making water available in over-abstracted catchments and reducing demand.</p>
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Table 1-2: List of Local Authority Housing Targets within 10km of European Sites

Site	Local Plan Area	Housing Target
Wealden Heaths Phase I SPA		
	Waverley Borough	11,210
	Guildford Borough	10,678
	Rushmoor Borough	8,884
	East Hampshire	10,060
	South Downs National Park	4,750
Total		45,582
Thames Basin Heaths SPA		
	Waverley Borough	11,210
	Guildford Borough	10,678
	Woking Borough	4,964
	Surrey Heath Borough	3,240
	Runnymede Borough	7,507
	Elmbridge Borough	3,375
	Bracknell Forest Borough	11,139
	Windsor & Maidenhead	14,260
	Wokingham Borough	13,230
	Rushmoor Borough	8,884
	Hart District	7,614
Total		96,101
Wealden Heaths Phase II SPA (& Woolmer Forest SAC)		
	Waverley Borough	11,210
	East Hampshire District	10,060
	South Downs National Park	4,750
	Horsham District	16,000
	Chichester District	7,388
Total		49,408
Ebernoe SAC and The Mens SAC		
	Waverley Borough	11,210
	South Downs National Park	4,750
	Horsham District	16,000
	Chichester District	7,388
Total		39,348
Mole Gap to Reigate Escarpment SAC		
	Mole Valley	3,760
	Reigate & Banstead	6,900
	Tandridge	2,500
	Epsom & Ewell	3,620
	Elmbridge	3,375
	Guildford	10,678
	Waverley	11,210
	Woking	4,964
Total		47,007

Stage 3

1.26 Information regarding the European site(s) screened and the likely effects that may arise due to implementation of the Neighbourhood Plan can be found in Tables 1-3 to 1-9 and 1-10. All other European Sites were screened out of this assessment at an early stage as it was considered that their distance from the Neighbourhood Plan area coupled with the nature and content of the proposed Neighbourhood Plan meant that there is no pathway or mechanism which would give rise to significant effect either alone or in combination. In this respect regard has been had to the Local Plan Part 1 HRA.

Table 1-3: Details of Thames Basin Heaths SPA and Potential Effects Thereon

European site:	Thames Basin Heaths Special Protection Area (SPA).
Site description:	The Thames Basin Heaths SPA was proposed in October 2000, and full SPA status was approved on 9 March 2005. It covers an area of some 8,274 ha, consisting of 13 Sites of Special Scientific Interest (SSSI) scattered from Surrey, to Berkshire in the north, through to Hampshire in the west. The habitat consists of both dry and wet heathland, mire, oak, birch acid woodland, gorse scrub and acid grassland with areas of rotational conifer plantation.
Relevant international nature conservation features:	Thames Basin Heaths SPA qualifies under Article 4.1 of the Birds Directive (79/409/EEC) by supporting populations of European importance of the following species listed on Annex I of the Directive: During the breeding season: <ul style="list-style-type: none"> - Nightjar <i>Caprimulgus europaeus</i>: 7.8% of the breeding population in Great Britain (count mean, 1998-1999); - Woodlark <i>Lullula arborea</i>: 9.9% of the breeding population in Great Britain (count as at 1997); - Dartford warbler <i>Sylvia undata</i>: 27.8% of the breeding population in Great Britain (count as at 1999).
Environmental conditions which support the site	<ul style="list-style-type: none"> • Appropriate management • Management of disturbance during breeding season (March to July) • Minimal air pollution • Absence or control of urbanisation effects, such as fires and introduction of invasive non-native species • Maintenance of appropriate water levels • Maintenance of water quality
Potential effects arising from the Neighbourhood Plan	<ul style="list-style-type: none"> • Indirect effects arising from disturbance due to recreational activity on the SPA, atmospheric pollution and water resource as well as potential for direct urbanising impacts.

Table 1-4: Details of Wealden Heaths Phase I & II SPA (Thursley, Hankley & Frensham Commons SPA, Thursley, Ash, Pirbright & Cobham SAC and Thursley & Ockley Bogs Ramsar) and Potential Effects Thereon

International site:	Wealden Heaths Phase I SPA
Site description:	The Wealden Heaths Phase I & II SPAs covers an area of some 3,924 ha with areas of wet and dry heathland, valley bogs, broad-leaved and coniferous woodland, permanent grassland and open water.
Relevant international nature conservation features:	<p>The Wealden Heaths Phase I & II (Thursley, Hankley and Frensham Commons) Special Protection Area qualifies under Article 4.1 of the Birds Directive (79/409/EEC) by supporting breeding populations of European importance of the following species listed on Annex I of the Directive:</p> <ul style="list-style-type: none"> - Nightjar <i>Caprimulgus europaeus</i> - Woodlark <i>Lullula arborea</i> - Dartford warbler <i>Sylvia undata</i> <p>These species nest on or near the ground and as a result are susceptible to predation and disturbance.</p> <p>Thursley, Ash, Pirbright and Chobham Special Area of Conservation is designated for three Annex I habitats. The qualifying Annex 1 habitats are:</p> <ul style="list-style-type: none"> - Wet heathland with cross-leaved heath - Dry heaths - Depressions on peat substrates <p>Thursley and Ockley Bog Ramsar site qualifies under two of the nine Ramsar criteria.</p>
Environmental Conditions which Support the Site	<ul style="list-style-type: none"> • Appropriate management; • Managed recreational pressure; • Minimal air pollution; • Absence or control of urbanisation effects such as fires and introduction of invasive non-native species; • Maintenance of appropriate water levels; • Maintenance of water quality.
Potential Effects Arising from the Neighbourhood Plan	<ul style="list-style-type: none"> • Indirect effects arising from disturbance due to recreational activity on the SPA, atmospheric pollution and water resource as well as potential for direct urbanising impacts.

Table 1-5: Details of Ebernoe Common SAC and Potential Effects Thereon

International site:	Ebernoe Common SAC
Site description:	The Ebernoe Common SAC covers an area of some 235 ha with an extensive block of beech <i>Fagus sylvatica</i> high forest and former wood-pasture over dense holly <i>Ilex aquifolium</i> , and has a very rich epiphytic lichen flora, including <i>Agonimia octospora</i>

	and <i>Catillaria atropurpurea</i> . It represents Atlantic acidophilous beech forests in the south-eastern part of the habitat's UK range.
Relevant international nature conservation features:	A maternity colony of barbastelles <i>Barbastella barbastellus</i> with species appearing to be present throughout the year, 1323 Bechstein`s bat <i>Myotis bechsteinii</i> A maternity colony of Bechstein`s bat <i>Myotis bechsteinii</i> is associated with this area
Environmental Conditions which Support the Site	<ul style="list-style-type: none"> • Managed recreational pressure;
Potential Effects Arising from the Neighbourhood Plan	<ul style="list-style-type: none"> • Indirect effects arising from disturbance due to recreational activity.

Table 1-6: Details of Mole Gap to Reigate Escarpment SAC and Potential Effects Thereon

International site:	Mole Gap to Reigate Escarpment SAC
Site description:	The Mole Gap to Reigate Escarpment SAC covers an area of some 892 ha with european dry heaths, <i>Asperulo-Fagetum</i> beech forests and supports Annex II species that are a qualifying feature, but not a primary reason for site selection.
Relevant international nature conservation features:	Great crested newt <i>Triturus cristatus</i> Bechstein`s bat <i>Myotis bechsteinii</i>
Environmental Conditions which Support the Site	<ul style="list-style-type: none"> • Managed recreational pressure; • Minimal air pollution.
Potential Effects Arising from the Neighbourhood Plan	<ul style="list-style-type: none"> • Indirect effects arising from disturbance due to recreational activity and atmospheric pollution.

Table 1-7: The Mens SAC and Potential Effects Thereon

International site:	The Mens SAC
Site description:	The Mens SAC covers an area of some 205 ha with Atlantic acidophilous beech forests with <i>Ilex</i> and sometimes also <i>Taxus</i>

	in the shrublayer (Quercion robori-petraeae or Ilici-Fagenion) for which this is considered to be one of the best areas in the United Kingdom.
Relevant international nature conservation features:	Barbastella barbastellus for which the area is considered to support a significant presence.
Environmental Conditions which Support the Site	<ul style="list-style-type: none"> Managed recreational pressure;
Potential Effects Arising from the Neighbourhood Plan	<ul style="list-style-type: none"> Indirect effects arising from disturbance due to recreational activity.

Table 1-8: Butser Hill SAC and Potential Effects Thereon

International site:	Butser Hill SAC
Site description:	The Butser Hill SAC covers an area of some 237ha. Butser Hill is situated on the east Hampshire chalk which forms part of the South Downs. Much of the site consists of Festuca ovina – Avenula pratense grassland. The site exhibits various transitions between semi-natural dry grassland, chalk heath, mixed scrub and Taxus baccata woods.
Relevant international nature conservation features:	Dense yew Taxus baccata woodland in association with scrub and chalk grassland.
Environmental Conditions which Support the Site	<ul style="list-style-type: none"> Minimal air pollution;
Potential Effects Arising from the Neighbourhood Plan	<ul style="list-style-type: none"> Indirect effects arising from atmospheric pollution

Table 1-9: Woolmer Forest SAC and Potential Effects Thereon

International site:	Woolmer Forest SAC
Site description:	The Woolmer Forest SAC covers an area of some 670ha with European dry heaths, natural dystrophic lakes and ponds and depressions of peat substrate with Rhynchosporion.

Relevant international nature conservation features:	Northern Atlantic wet heaths with Erica tetralix Transition mires and quaking bogs
Environmental Conditions which Support the Site	<ul style="list-style-type: none"> • Minimal air pollution;
Potential Effects Arising from the Neighbourhood Plan	<ul style="list-style-type: none"> • Indirect effects arising from atmospheric pollution

Stage 4

1.27 The consideration of potential effects are set out in Table 1-10.

Table 1-10: Assessment of Potential Effects

Indirect effect from recreational disturbance and urbanisation.	<p>The likely effects of recreational disturbance have been summarised in the Underhill-Day study for Natural England and RSPB (2005); this provides a review of the urban effects on lowland heaths and their wildlife. The main issues relating to the conservation objectives and the integrity of the SPAs and SAC's effected by recreational disturbance as a whole are: fragmentation, disturbance, fires, cats, dogs (as a result of nest disturbance and enrichment), prevention of management, off-roading, vandalism and trampling.</p> <p>Natural England has advised that recreational pressure, as a result of increased residential development within 5km of the Thames Basin Heaths SPA & Thursley, Ash, Pirbright & Chobham SAC (or sites of 50 or more dwellings within 7km), is having a significant adverse impact on the Annex I bird species. Woodlark and Nightjar are ground nesting and Dartford Warblers nest close to the ground. They are therefore sensitive to disturbance, particularly from dogs, but also from walkers, and cyclists etc. They are, in addition, vulnerable to other effects of urbanisation, in particular predation by cats.</p> <p>Joint work involving Natural England and the authorities affected by the SPA/SAC have agreed a mechanism to avoid impacts to the SPA/SAC from recreational activities in the form of Suitable Alternative Natural Greenspace (SANG) and Strategic Access Management & Monitoring (SAMM) and from</p>
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	<p>the impacts of urbanisation by not allowing any net additional dwellings within 400m of the SPA. This mechanism and distance for effects has also been used as a proxy for other sites where urbanisation and/or recreational impact has been identified as a pathway unless indicated otherwise.</p> <p>In terms of Wealden Heaths Phase I & II SPAs Natural England has advised that major developments within 5km of this site should be subject to HRA and sites considered on a case by case basis.</p> <p>The Local Plan Part 1 HRA sets out that the Ebernoe SAC <i>'is considered to be susceptible to disturbance, which may arise through excessive recreational pressure. In the absence of precise visitor survey data, and given the susceptibility of the SAC it is not possible, prior to mitigation to conclude that the Plan will not lead to adverse effects alone or in combination with development in other relevant local Authorities'</i>.</p> <p>For the Mole Gap to Reigate Escarpment SAC the Local Plan Part 1 HRA states <i>'low recreational pressure is considered to be important in the maintenance of site integrity. Given that the SAC lies within the typical distance over which visitors will travel to reach a countryside site for a day visit, and that the SAC is sensitive to recreational pressure it is not possible, prior to mitigation to conclude that the Plan will not lead to adverse effects alone or in combination with development in other relevant local authorities.'</i></p> <p>In respect to The Mens SAC the Local Plan Part 1 HRA states <i>'this site is managed as minimum intervention and thus its habitats are potentially at risk from excessive recreational pressure. In the absence of precise visitor survey data, and given the susceptibility of the SAC it is not possible, prior to mitigation to conclude that the Plan will not lead to adverse effects alone or in combination with development in other relevant local authorities.'</i></p> <p>The Cranleigh Neighbourhood Plan does not allocate any land or sites for net additional dwellings within 400m of the Thames Basin Heaths SPA, Thursley, Ash, Pirbright & Chobham SAC or the Wealden Heaths SPAs or any other European site. As such, there is no pathway for direct urbanising impacts arising from the plan.</p> <p>Neither does the Neighbourhood Plan propose any development within 5km of the Wealden Heaths SPAs</p>
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	<p>and Thursley, Ash, Pirbright and Chobham SAC where Natural England has advised that sites should be considered on a case by case basis as significant effect cannot be ruled out.</p> <p>As such, in the absence of avoidance and/or mitigation measures which cannot be taken into account at the screening stage of HRA (including any adopted policies in the Local Plan Part 1) and in-combination with other plans and projects it is considered, at the time of undertaking this assessment, that the Cranleigh Neighbourhood Plan will not have likely significant effects on the Wealden Heaths SPAs (including the Thursley, Hankley & Frensham Commons SPA and Thursley & Ockley Bog Ramsar) or the Thursley, Ash, Pirbright and Chobham Common SAC either alone or in-combination.</p> <p>Given the distance of 15km from the allocations sites to the Thames Basin Heaths SPA, it is considered that there is no pathway for recreational impacts to the SPA, based on the distance of 5km for recreational impacts (or 7km from large sites) set out in the SPA Delivery Plan.</p> <p>Whilst the Mole Gap to Reigate Escarpment, Ebernoe and The Mens SACs lie some distance from the neighbourhood plan area and the allocations sites, the Local Plan Part 1 HRA could not discount likely significant effect in the absence of avoidance/mitigation mainly due to a lack of visitor survey data and they lie within the typical distance for day visits to countryside sites (17.2km). As such, and taking a precautionary approach, significant effect from recreational impacts cannot be ruled out to these SACs.</p> <p>In this respect an <u>Appropriate Assessment</u> is required.</p>
Atmospheric Pollution	<p>The Local Plan Part 1 HRA concludes no likely significant effect as a result of atmospheric pollution in combination with other plans and projects on the Thames Basin Heaths SPA, Wealden Heaths SPAs given the findings of the Council's air quality evidence. However, this is on the basis of the transport interventions identified within the plan and its policies which are a form of avoidance/mitigation. This is also the case in relation to the Butser Hill, Mole Gap to Reigate Escarpment and Woolmer Forest SAC's.</p> <p>Department of Transport's, Transport Analysis Guidance states that beyond 200m the contribution of vehicle emissions from the roadside to local pollution</p>

	<p>levels is not significant. None of the highways lying within the Plan area sit within 200m of any European site and as such the plan individually, is unlikely to have significant effect.</p> <p>The Neighbourhood Plan area lies over 11.5km from the Wealden Heaths Phase I SPA and its component parts, 15km from the Thames Basin Heaths SPA, 24km to Woolmer Forest SAC and 38km from the Butser Hill SAC. Given the distance between the Neighbourhood Plan area and the distance visitors are likely to travel to these European sites and hence roads lying within 200m of these sites where air quality standards could be exceeded, it is considered that in combination, significant effects to these European sites can be ruled out in terms of atmospheric pollution.</p> <p>However, the Plan area and allocations sites do sit within visitor catchments of a European site where atmospheric pollution is an issue and significant effect cannot be ruled out, the Mole Gap to Reigate Escarpment SAC.</p> <p>In this respect given that avoidance/mitigation cannot be taken into account at the screening stage of HRA, including the submission policies of the Neighbourhood Plan, it is considered, at the time of undertaking this HRA that it cannot be concluded that the Cranleigh Neighbourhood Plan with respect to its allocations will not give rise to likely significant effects arising from atmospheric pollution either alone or in combination with other plans and projects.</p> <p>In this respect an Appropriate Assessment is required.</p>
Water Resource	<p>The Local Plan Part 1 HRA states that <i>'it has already been noted that the security of water supply is beyond the scope of Waverley Borough to influence, and it is considered that the Council has taken all appropriate measures to minimise any contribution to the overall pressures on water resources in the Guildford Water Resource Zone'</i>.</p> <p>The HRA also states that the control of water availability is largely the responsibility of the Environment Agency and Thames Water. It further states that the Environment Agency considers it will be possible for water companies to meet future water resource requirements in Waverley without increased abstractions from watercourses and groundwaters that are of importance to the Thames Basin Heaths,</p>

	<p>Wealden Heaths SPA and Thursley, Ash, Pirbright and Chobham SAC.</p> <p>For the Thames Basin Heaths SPA, Wealden Heaths SPA and Thursley, Ash, Pirbright & Chobham SAC significant effect is ruled out in the Part 1 HRA on the premise of securing strategic water resource options, leakage control and increasing water efficiencies which themselves are a form of avoidance and mitigation as are the policies set out in the Part 1 Local Plan and submission Neighbourhood Plan.</p> <p>In this respect given that avoidance/mitigation cannot be taken into account at the screening stage of HRA, it is considered, at the time of undertaking this HRA that it cannot be concluded that the Cranleigh Neighbourhood Plan with respect to its allocations will not give rise to likely significant effects arising from water resource either alone or in combination with other plans and projects.</p> <p>In this respect an Appropriate Assessment is required.</p>
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- 1.28 It is the conclusion of this HRA that following a screening assessment it cannot be ascertained, in light of the information available at the time of assessment that the Cranleigh Neighbourhood Plan will not give rise to significant effects on European Sites either alone or in-combination with other plans and/or projects.
- 1.29 Given the findings of this screening assessment a full appropriate assessment is required.
- 1.30 This HRA screening assessment was made on the 11 May 2020.