

# **Haslemere Neighbourhood Plan**

## **Strategic Environmental Assessment (SEA)**

Screening Statement - Determination under Regulation 9 of the SEA Regulations 2004

## **Habitats Regulations Assessment (HRA)**

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

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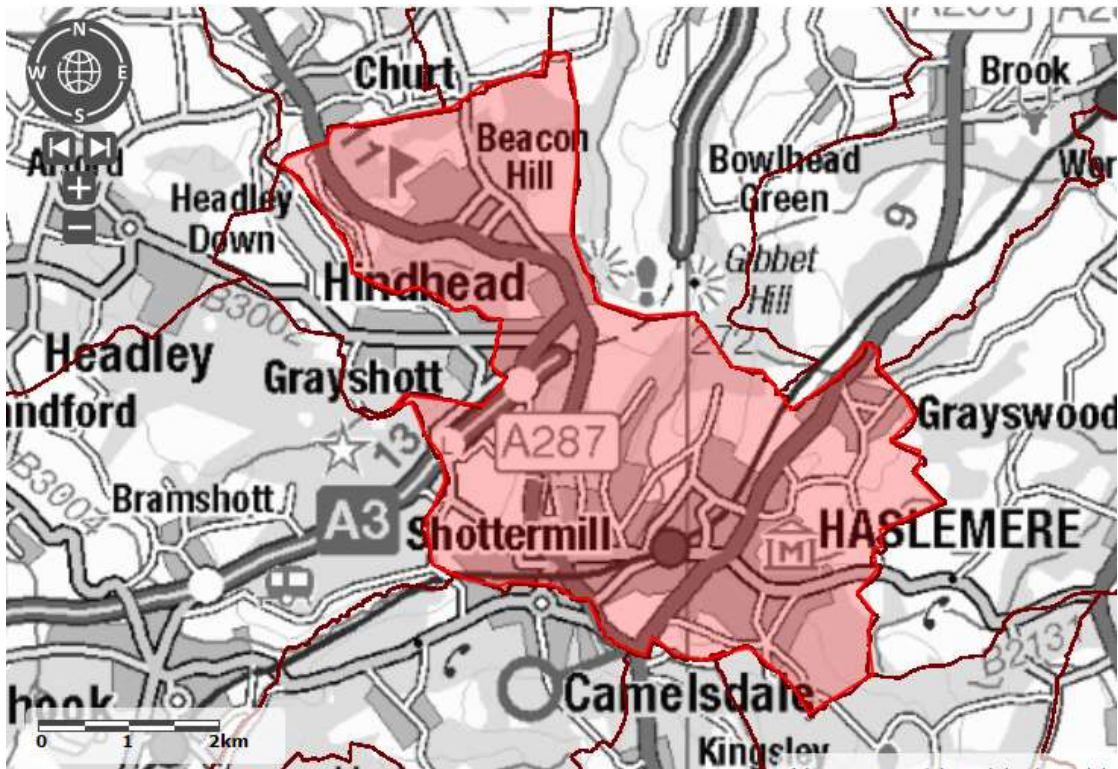
## **Introduction**

- 1.1. This Strategic Environmental Assessment (SEA) and 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 Haslemere Neighbourhood Plan requires SEA and/or HRA. This screening assessment is based on the draft Neighbourhood Plan dated March 2019.
- 1.2. Regulation 9 (1) of the Environmental Assessment of Plans and Programmes Regulations 2004 requires authorities to determine whether or not a Strategic Environmental Assessment is required for certain plans, policies or programmes. This statement also sets out the Borough Council's determination as to whether Appropriate Assessment is required under Regulation 105 of the Conservation of Habitats & Species Regulations 2017.
- 1.3. Under the requirements of the European Union Directive 2001/42/EC (Strategic Environmental Assessment (SEA) Directive) and Environmental Assessment of Plans and Programmes Regulations (2004), specific types of plans that set the framework for the future development consent of projects or which require Appropriate Assessment must be subject to an environmental assessment.
- 1.4. There are exceptions to this requirement for plans that determine the use of a small area at a local level and for minor modifications if it has been determined that the plan is unlikely to have significant environmental effects.
- 1.5. In accordance with the provisions of the SEA Directive and the Environmental Assessment of Plans and Programmes Regulations (2004) (Regulation 9 (1)), the Borough Council must determine if a plan requires an environmental assessment. 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 Haslemere Neighbourhood Plan**

- 1.6. 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.
- 1.7. The proposed Haslemere Neighbourhood Plan covers all of the area within the jurisdiction of Haslemere Town Council and contains the urban areas of Haslemere, Hindhead, Beacon Hill and Grayswood. Interspersed between the urban areas are a limited number of agricultural field patterns and numerous wooded copses, golf courses and the A3 strategic highway including part which is tunnelled at Hindhead. There is one rail station in the Plan area at Haslemere offering direct services to London Waterloo and Portsmouth. A plan of the designated area is shown in Plan 1-1.

**Plan 1-1: Map of the Designated Area for the Haslemere Neighbourhood Plan**



- 1.8. There are around 20 areas of woodland/copses designated as ancient/semi-natural or ancient replanted woodland which are also identified as priority habitat as well as swathes of woodpasture and parkland which is a national Biodiversity Action Plan (BAP) designation. Priority habitat designations also include areas of good quality semi improved grassland. There is one SSSI located in the Neighbourhood Plan area, The Devils' Punchbowl SSSI which also forms part of the Wealden Heaths Phase II SPA. The single SSSI unit within the Plan area (unit 2) is in a favourable condition status.
- 1.9. Adjacent to the Neighbourhood Plan boundary lies unit 1 of the Bramshott and Ludshott Commons SSSI which also forms part of the Wealden Heaths Phase II SPA. Unit 1 is in an unfavourable recovering condition status.
- 1.10. Just to the north and north east of the Plan area lies the Thursley, Hankley & Frensham Commons SSSI. The Thursley, Hankley & Frensham Commons SSSI also forms the Thursley, Hankley & Frensham Commons SPA and part of the Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC), the Wealden Heaths Phase I Special Protection Area and the Thursley & Ockley Bogs Ramsar, internationally designated sites for nature conservation. The Thursley, Hankley & Frensham Commons SSSI covers some 1,878ha with 99.89% in favourable or unfavourable recovering status which meets the PSA target of 95% in favourable or unfavourable recovering status. .
- 1.11. The Devil's Punch Bowl and Hindhead Heaths Biodiversity Opportunity Area (BOA) also lies within the Neighbourhood Plan area and is typified by largely wooded commons with adjacent farmland. Notable species in the BOA include Grayling, Hornet robberfly, Nightjar, Dartford Warbler, Woodlark, Adder and Common

Dormouse. The area also partly lies within the Surrey Hills Area of Outstanding Natural Beauty (AONB) which gives the plan area an undulating topography.

- 1.12. The Neighbourhood Plan area also lies within 1.5km of the Wealden Heaths Phase I SPA and its component parts, 3.5km of the Woolmer Forest SAC, 5.2km of the Ebernoe Common SAC, 12km of the Thames Basin Heaths SPA, 7.6km of the Shortheath Common SAC, 7.7km from East Hampshire Hangers SAC, 12.2km of The Mens SAC, 20km of the Butser Hill SAC and 30km of the Mole Gap to Reigate Escarpment SAC.
- 1.13. The neighbourhood plan lies partly within the River Wey and Tributaries catchment and partly within the Arun and Western Streams catchment areas. There are small areas of the Haslemere urban area which lie within flood risk zones 2 and 3 although these are mostly confined to green space areas.
- 1.14. From a heritage perspective, the Plan area contains numerous statutorily listed or locally listed buildings and structures. There are 3 Conservation Areas in Haslemere including Springhead, River Wey and the Town Centre. There is also one scheduled ancient monument in the Plan area, the Cross dyke on Hindhead Golf Course and four areas of archaeological potential.
- 1.15. The draft Haslemere Neighbourhood Draft Plan dated March 2019 sets out the vision for the Neighbourhood Plan area which is:-  
*'Haslemere should continue to thrive for sections of the community, protecting what is best about the town and its surrounding environment today but accommodating a larger more diverse and vibrant local economy with more local workers living and working in the town and the villages that surround it'.*
- 1.16. The draft neighbourhood plan also contains four key objectives: -  
*To encourage development that meets the housing needs of the community but protects the character of the area. In particular to encourage development for more homes for young people, local workers and homes suitable for downsizers;*  
*To protect and enrich our green spaces and the natural environment that surround us;*  
*To re-balance road use, limiting the adverse impact of motor vehicles by improving provision for off-street parking and/or improving facilities for alternatives forms of transport;*  
*To protect existing employment and to encourage the development of a more diverse range of local employment opportunities to create an increasingly vibrant and sustainable local economy.*
- 1.17. The draft Haslemere Neighbourhood Plan dated March 2019 contains a total of 18 policies ranging from guidance on housing mix and affordable housing, the design of development, sustainable development, protection and enhancement of wildlife and biodiversity habitats, the local economy and sustainable transport. The Neighbourhood Plan does not allocate any sites for development or set out a quantum of development for housing, employment or retail development.
- 1.18. 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'*

- 1.19 The Spatial Strategy of the Part 1 Local Plan identifies Haslemere (including the built up areas of Hindhead and Beacon Hill) as one of the focuses for development. The Part 1 Local Plan sets a housing requirement over the Plan period (2013-2032) of 11,210 dwellings and allocates 990 dwellings to Haslemere but does not allocate specific sites to the Neighbourhood Plan area leaving this to the Part 2 Local Plan.
- 1.20 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 Draft Neighbourhood Plan.
- 1.21 The Part 2 Local Plan is currently at the preferred options stage of preparation. Annex 3 of the Part 2 Local Plan Preferred Options proposes to allocate 16 sites to the Haslemere Neighbourhood Plan area totalling some 416 net additional dwellings.
- 1.22 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).
- 1.23 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
- 1.24 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. 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;
- 1.25 The Local Plan Part 2 Preferred Options is also accompanied by an HRA. Table 3 of the HRA considers that three allocations sites have potential HRA implications, whilst all other sites are not considered to have likely significant effects in isolation, but could have likely significant effects when considered in combination in relation to recreational pressure.

### **Sustainability Appraisal**

- 1.26 Under separate legislation (the Planning and Compulsory Purchase Act 2004 and associated Regulations), a local authority is required to carry out a Sustainability Appraisal (SA) for their Local Plan documents. This considers the social and economic impacts of a plan as well as the environmental impacts. Neighbourhood Plans are not however covered by this requirement and as such a Sustainability Appraisal is not required.

## Habitats Regulations Assessment (HRA) – Screening

- 1.27 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.
- 1.28 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.
- 1.29 Whilst Schedule 2 of the Neighbourhood Planning (General) Regulations 2012 sets out a general presumption that an HRA is unlikely to be required, it is still necessary to carry out a screening assessment.
- 1.30 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 draft 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.

- 1.31 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**

- 1.32 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**

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

#### **Stage 2**

- 1.34 Information about the Neighbourhood Plan can be found in paragraphs 1.6 to 1.17 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><b>Plan/ Project</b></p>	<p><b>National Planning Policy Framework (2019):</b> High level national planning policy covering topics such as housing, economy, employment, retail as well as biodiversity, flood risk and heritage.</p> <p><b>South East Plan 2009:</b> Saved Policy NRM6 sets out protection for the Thames Basin Heaths SPA.</p> <p><b>Waverley Local Plan Part 1 2013-2032:</b> Sets policies for the consideration of development and the spatial strategy for the Borough including provision of 11,210 dwellings with 990 allocated to the Haslemere Neighbourhood Plan area.</p> <p><b>Waverley Local Plan Part 2 (Preferred Options):</b> Includes a number of development management policies and sites allocated for development including 16 sites in the Haslemere NP area.</p> <p><b>Other Local Authority Local Plans within 10km or adjoining sites identified in paras 1.8 to 1.12:</b> Housing target for areas around European sites set out in Table 1-2.</p> <p><b>Large Scale Projects within 10km or adjoining European Sites:</b> Large scale projects within 10km are subsumed in the consideration of 'Other Local Authority Local Plans' above.</p> <p><b>Thames Basin Heaths Joint Delivery Framework 2009:</b> Sets out the agreed Framework regarding the approach and standards for avoiding significant effects on the Thames Basin Heaths SPA.</p> <p><b>Environment Agency, Thames River Basin District Management Plan (2015):</b> 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><b>Environment Agency, Thames Catchment Flood Management Plan (2009):</b> Aim is to promote more sustainable approaches to managing flood risk. Will be delivered through a combination of different approaches.</p> <p><b>Environment Agency, Arun &amp; Western Streams Catchment Flood Management Plan (2015):</b> Neighbourhood Plan area sits within sub-area 1: Rother Valley/Middle Arun/Weald. The key aim in this sub-area is to take action with others to store water or manage run-off in locations that provide overall flood risk.</p> <p><b>Environment Agency, Arun &amp; Western Streams Abstraction Licensing Strategy (2019):</b> identifies the Arun &amp; Western Streams having restricted 'Water available for licensing'.</p> <p><b>Environment Agency, River Wey Catchment Abstraction Management Strategy (2019):</b> identifies the Wey having restricted 'Water available for licensing'.</p> <p><b>Environment Agency, Water Resources Strategy: Regional Action Plan for Thames Region (2009):</b> 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
<b>Wealden Heaths Phase I SPA</b>		
	Waverley Borough	11,210
	Guildford Borough	10,678
	Rushmoor Borough	8,884
	East Hampshire	10,060
	South Downs National Park	4,750
<b>Total</b>		<b>45,582</b>
<b>Thames Basin Heaths SPA</b>		
	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	6,208
<b>Total</b>		<b>94,695</b>
<b>Wealden Heaths Phase II SPA</b>		
	Waverley Borough	11,210
	East Hampshire District	10,060
	South Downs National Park	4,750
	Horsham District	16,000
	Chichester District	7,388
<b>Total</b>		<b>49,408</b>
<b>Ebernoe SAC and The Mens SAC</b>		
	Waverley Borough	11,210
	South Downs National Park	4,750
	Horsham District	16,000
	Chichester District	7,388
<b>Total</b>		<b>39,348</b>

### Stage 3

- 1.35 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"> <li>- Nightjar <i>Caprimulgus europaeus</i>: 7.8% of the breeding population in Great Britain (count mean, 1998-1999);</li> <li>- Woodlark <i>Lullula arborea</i>: 9.9% of the breeding population in Great Britain (count as at 1997);</li> <li>- Dartford warbler <i>Sylvia undata</i>: 27.8% of the breeding population in Great Britain (count as at 1999).</li> </ul>
Environmental conditions which support the site	<ul style="list-style-type: none"> <li>• Appropriate management</li> <li>• Management of disturbance during breeding season (March to July)</li> <li>• Minimal air pollution</li> <li>• Absence or control of urbanisation effects, such as fires and introduction of invasive non-native species</li> <li>• Maintenance of appropriate water levels</li> <li>• Maintenance of water quality</li> </ul>
Potential effects arising from the Neighbourhood Plan	<ul style="list-style-type: none"> <li>• 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.</li> </ul>

**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 & II SPAs
Site description:	The Wealden Heaths Phase I & II SPAs cover 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	The Wealden Heaths Phase I & II (Thursley, Hankley and Frensham Commons) Special Protection Area qualifies under

nature conservation features:	<p>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"> <li>- Nightjar <i>Caprimulgus europaeus</i></li> <li>- Woodlark <i>Lullula arborea</i></li> <li>- Dartford warbler <i>Sylvia undata</i></li> </ul> <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.</p> <p>The qualifying Annex 1 habitats are:</p> <ul style="list-style-type: none"> <li>- Wet heathland with cross-leaved heath</li> <li>- Dry heaths</li> <li>- Depressions on peat substrates</li> </ul> <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"> <li>• Appropriate management;</li> <li>• Managed recreational pressure;</li> <li>• Minimal air pollution;</li> <li>• Absence or control of urbanisation effects such as fires and introduction of invasive non-native species;</li> <li>• Maintenance of appropriate water levels;</li> <li>• Maintenance of water quality.</li> </ul>
Potential Effects Arising from the Neighbourhood Plan	<ul style="list-style-type: none"> <li>• 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.</li> </ul>

**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:	<p>A maternity colony of barbastelles <i>Barbastella barbastellus</i> with species appearing to be present throughout the year,</p> <p>1323 Bechstein's bat <i>Myotis bechsteinii</i></p> <p>A maternity colony of Bechstein's bat <i>Myotis bechsteinii</i> is associated with this area</p>
Environmental Conditions	<ul style="list-style-type: none"> <li>• Managed recreational pressure;</li> </ul>

which Support the Site	
Potential Effects Arising from the Neighbourhood Plan	<ul style="list-style-type: none"> <li>• Indirect effects arising from disturbance due to recreational activity.</li> </ul>

**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, Asperulo-Fagetum 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"> <li>• Managed recreational pressure;</li> <li>• Minimal air pollution.</li> </ul>
Potential Effects Arising from the Neighbourhood Plan	<ul style="list-style-type: none"> <li>• Indirect effects arising from disturbance due to recreational activity and atmospheric pollution.</li> </ul>

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

Effects Arising from the Neighbourhood Plan	activity.
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**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 <i>Festuca ovina</i> – <i>Avenula pratense</i> grassland. The site exhibits various transitions between semi-natural dry grassland, chalk heath, mixed scrub and <i>Taxus baccata</i> woods.
Relevant international nature conservation features:	Dense yew <i>Taxus baccata</i> woodland in association with scrub and chalk grassland.
Environmental Conditions which Support the Site	<ul style="list-style-type: none"> <li>• Minimal air pollution;</li> </ul>
Potential Effects Arising from the Neighbourhood Plan	<ul style="list-style-type: none"> <li>• Indirect effects arising from atmospheric pollution</li> </ul>

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

Plan	
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#### Stage 4

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

**Table 1-5: Assessment of Potential Effects**

<p>Indirect effect from recreational disturbance and urbanisation.</p>	<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 and urbanisation 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 &amp; Thursley, Ash, Pirbright &amp; 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 &amp; Monitoring (SAMM) and from the impacts of urbanisation by not allowing any net additional dwellings within 400m of the SPA.</p> <p>In terms of Wealden Heaths Phase I &amp; 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</i></p>
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	<p><i>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 draft Haslemere Neighbourhood Plan does not allocate any land or sites for net additional dwellings or other types of development that could give rise to increased recreational or urbanisation impacts. It is also considered that the Plan’s draft policies mainly deal with the local economy, design, protection of the environment, sustainability and the type of housing needed (not the quantum) and would not lead to pathways for effect.</p> <p>As such, there are no pathways for effect for impacts either alone or in-combination with other plans and projects. Therefore it is considered, at the time of undertaking this assessment and even 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) that the draft Haslemere Neighbourhood Plan will not give rise to likely significant effects on any of the European Sites in terms of recreation or urbanisation.</p> <p>In this respect an Appropriate Assessment is not required.</p>
Atmospheric Pollution	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

	<p>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>However, the draft Neighbourhood Plan does not allocate any land or sites for development and neither is it considered that any of the Plan's draft policies which mainly deal with the local economy, design, protection of the environment, sustainability and the type of housing needed (not the quantum) would lead to pathways for effect. In this respect and even in the absence of avoidance/mitigation it is considered that the Haslemere Neighbourhood Plan would not give rise to likely significant effect in terms of atmospheric pollution either alone or in combination with other plans and projects.</p> <p>In this respect an Appropriate Assessment is not required.</p>
Water Resource	<p>The Local Plan Part 1 HRA states that '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'.</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, Wealden Heaths SPA and Thursley, Ash, Pirbright and Chobham SAC.</p> <p>However, the draft Neighbourhood Plan does not allocate any land or sites for development and neither is it considered that any of the Plan's draft policies which mainly deal with the local economy, design, protection of the environment, sustainability and the type of housing needed (not the quantum) would lead to pathways for effect. In this respect and even in the absence of avoidance/mitigation it is considered that the Haslemere Neighbourhood Plan would not give rise to likely significant effect in terms of water</p>



	<p>resources either alone or in combination with other plans and projects.</p> <p>In this respect an Appropriate Assessment is not required.</p>
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1.37 It is the conclusion of this HRA that following a screening assessment it can be ascertained, in light of the information available at the time of assessment and even in the absence of avoidance and mitigation measures that the Haslemere Neighbourhood Plan **will not** give rise to significant effects on European Sites either alone or in-combination with other plans and/or projects. Given the findings of the screening assessment it is considered that a full appropriate assessment is not required.

### The SEA Screening Process

1.38 The process for determining whether or not an SEA is required is called ‘screening’. For some types of plan or programme SEA is mandatory and includes the following:

- Plans which are prepared for town and country planning or land use and which set the framework for future development consent of projects listed in the Environmental Impact Assessment (EIA) Directive; or
- Plans which have been determined to require an assessment under the Habitats Directive (this has already been screened out as set out in paragraphs 1.27 to 1.37 of this screening assessment).

1.39 However, the main determining factor when considering whether a plan or programme requires SEA is whether it will have significant environmental effects.

1.40 Within 28 days of making its determination, the determining authority must publish a statement, such as this one, setting out its decision. If it is determined that an SEA is not required, the statement must include the reasons for this.

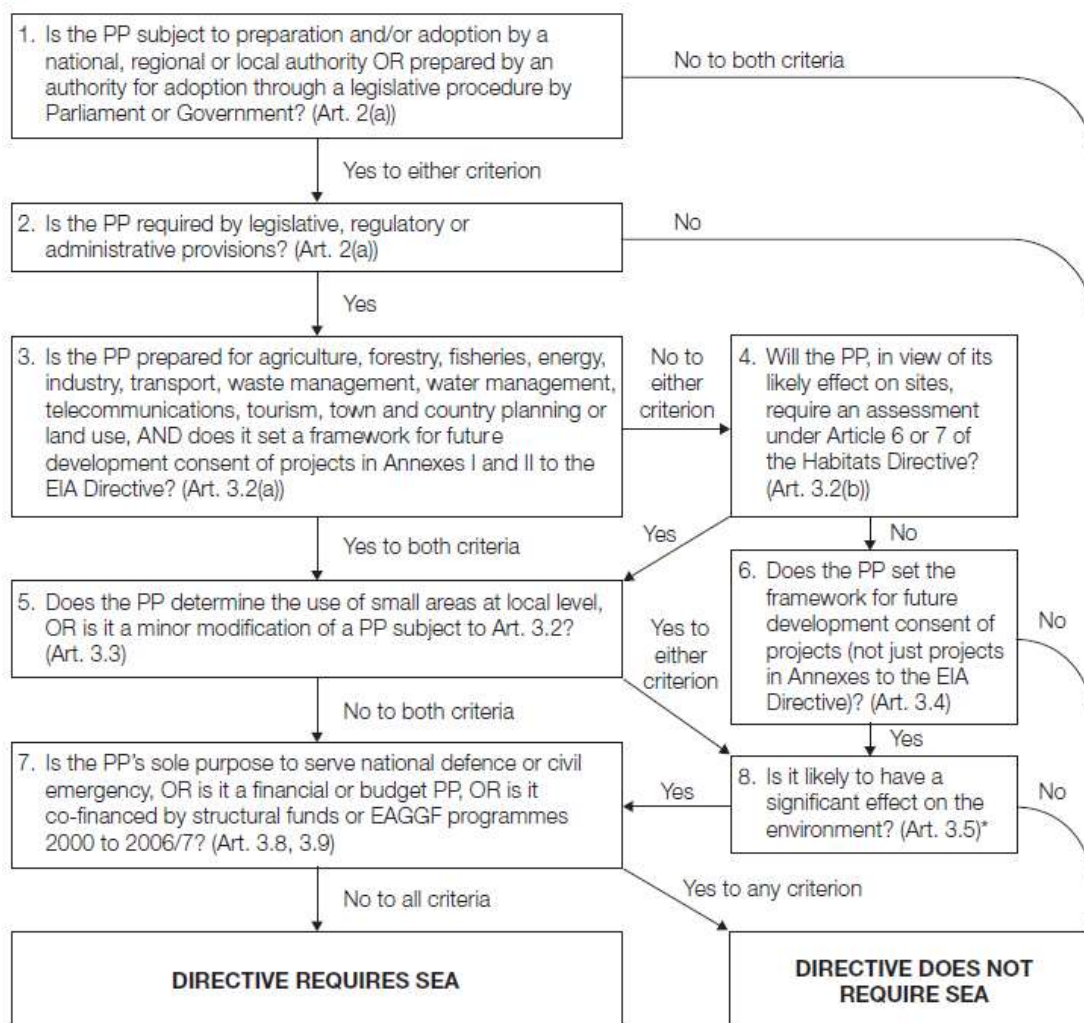
1.41 This Screening Report sets out the Council’s determination under Regulation 9(1) of the Environmental Assessment of Plans and Programmes Regulations 2004 on whether or not SEA is required for the Haslemere Neighbourhood Plan. The Borough Council must consult with the three statutory bodies (Environment Agency, Historic England, Natural England) and take their views into account before issuing a final determination and this was carried out from 13<sup>th</sup> August to 13<sup>th</sup> September 2019. This is based on a two-step approach, the first of which is to assess the plan against the flowchart as set out in government guidance *A Practical Guide to the Strategic Environmental Assessment Directive*<sup>1</sup>. The flow chart is shown in Figure 1.

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<sup>1</sup> A Practical Guide to the Strategic Environmental Process (2005) ODPM. Available at: <https://www.gov.uk/government/publications/strategic-environmental-assessment-directive-guidance>

**Figure 1:**

This diagram is intended as a guide to the criteria for application of the Directive to plans and programmes (PPs). It has no legal status.



\*The Directive requires Member States to determine whether plans or programmes in this category are likely to have significant environmental effects. These determinations may be made on a case by case basis and/or by specifying types of plan or programme.

1.42 The second step is to consider whether the Haslemere Neighbourhood Plan will have significant environmental effects when considered against the criteria set out in Annex II of the Directive and Schedule I of the Regulations. The findings of step 1 and step 2 are shown in Tables 1-11 and 1-12.

**Table 1-11: SEA Screening Step 1**

Stage in Flowchart	Y/N	Reason
1. Is the plan/programme subject to preparation and/or adoption by a national, regional or local	Y	The provision to prepare and adopt Neighbourhood Plans is given by the Town & Country Planning Act

Stage in Flowchart	Y/N	Reason
<p>authority or prepared by an authority for adoption through a legislative procedure by parliament or Government? (Article 2(a))</p>		<p>1990 (as amended). The Neighbourhood Plan will be prepared by Haslemere Town Council and 'made' by Waverley Borough Council. The preparation and adoption procedure is set out in the Neighbourhood Planning (General) Regulations 2012 and The Neighbourhood Planning (referendums) Regulations 2012. <b>Move to Stage 2</b></p>
<p>2. Is the plan/programme required by legislative, regulatory or administrative provisions? (Article 2(a))</p>	N	<p>There is no mandatory requirement to prepare and/or adopt Neighbourhood Plans. However, if the plan is 'made' it will form part of the Development Plan for Waverley and therefore the possibility of significant effects should be considered. <b>Move to Stage 3</b></p>
<p>3. Is the plan/programme prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive? (Article 3.2(a))</p>	N	<p>The Neighbourhood Plan has been prepared for town &amp; country planning and/or land use. It does not allocate any land or sites for development and as such the plan does not set the framework for development consent of projects in Annexes I &amp; II of the EIA Directive. <b>Move to Stage 4.</b></p>
<p>4. Will the plan/programme, in view of its likely effect on sites, require an assessment under Article 6 or 7 of the Habitats Directive? (Article 3.2(b))</p>	N	<p>The HRA screening undertaken in paragraphs 1.27 to 1.37 of this assessment has determined that Appropriate Assessment is not required. <b>Move to Stage 6.</b></p>
<p>5. Does the plan/programme determine the use of small areas at local level, OR is it a minor modification of a PP subject to Art. 3.2? (Article 3.3)</p>	N/A	<p>Whilst not applicable, the plan will be used in the determination of planning applications, although it does not allocate any land or sites for development.</p>

Stage in Flowchart	Y/N	Reason
		The plan is not a minor modification of an existing plan. <b>Move to Stage 6</b>
6. Does the plan/programme set the framework for future development consent of projects (not just projects in Annexes to the EIA Directive)? (Article 3.4)	Y	The Draft Neighbourhood Plan does not allocate any land or sites for development but does set out policies to guide development if it comes forward and as such sets the framework for future development consents. <b>Move to Stage 8.</b>
7. Is the plan/programme's sole purpose to serve national defence or civil emergency, OR is it a financial or budget PP, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7? (Article 3.8, 3.9)	N/A	Although not applicable, the Neighbourhood Plan will not have the sole purpose to serve national defence or civil emergency and it will not be a financial or budgetary plan. Neither will it be co-financed by structural or EAGGF Programmes.
8. Is it likely to have a significant effect on the environment? (Article 3.5)	N	Effects on the environment and whether these are significant are considered in Table 1-12. <b>If Significant Effects likely move to Stage 7</b>

**Table 1-12: SEA Screening Step 2**

<b>Criteria (from Annex II of SEA Directive and Schedule I of the Regulations)</b>		<b>Response</b>	
<b>Characteristics of the plan or programme</b>			<b>Significant Effect?</b>
(a) 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>The Haslemere Neighbourhood Plan will set out policies against which development proposals in the Neighbourhood Plan area will be considered. The Draft Plan sets out general policies relating to the local economy, design, protection of the environment, sustainability and the type of housing needed (not the quantum). This includes Policy H3 which deals with building performance and biodiversity as well as policies H6 which deal with sustainable transport, H7 with high design quality, H11 which deals with habitats and H14 dealing with wildlife corridors. These policies should generally have positive effects.</p> <p>The plan does not however allocate any land or sites for development.</p> <p>As such, whilst the Neighbourhood Plan has the potential to set the framework for decision making on individual projects, the policies taken as a whole will largely have positive effects.</p>		N
(b) The degree to which the plan or programme influences other plans and programmes including those in a hierarchy.	<p>The Neighbourhood Plan will form part of the Development Plan for Waverley Borough Council and will sit alongside the adopted Local Plan Part 1 (2013-2032) and the proposed sites and policies in the Local Plan Part 2 once adopted. The adopted and proposed policies of the Local Plan have informed the preparation of the Haslemere Neighbourhood Plan policies. However, it is the Local Plan that identifies the strategic approach to new development in the Borough including site allocations for the Neighbourhood Plan area and the Neighbourhood Plan must be consistent with this rather than influence it.</p>		N
(c) The relevance of the plan or programme for the integration of	<p>The Draft Neighbourhood Plan sets out general policies relating to the local economy, design, protection of the environment,</p>		N

Criteria (from Annex II of SEA Directive and Schedule I of the Regulations)	Response	
environmental considerations, in particular with a view to promoting sustainable development.	<p>sustainability and the type of housing needed (not the quantum). This includes Policy H3 which deals with building performance and biodiversity as well as policies H6 which deal with sustainable transport, H7 with high design quality, H11 which deals with habitats and H14 dealing with wildlife corridors. The Plan also states that the quantum of housing allocated to the Plan area by the Local Plan Part 1 is a maximum and that no further housing is identified in the period 2013-2032.</p> <p>As such, the plan should have positive effects on the built and natural environment including local and wider biodiversity interests such as designated sites, priority habitats and the Biodiversity Opportunity Areas (BOA) as well as securing high quality design, building and site sustainability and sustainable transport through Policy H6 and use of Travel Plans in Policy H4. Taken together the policies should promote sustainable development.</p>	
(d) Environmental problems relevant to the plan or programme.	<p>Environmental problems include potential recreational or urbanising impacts to European sites as well as atmospheric pollution and water resources. Paragraphs 1.27 to 1.37 of this assessment sets out these effects of the Neighbourhood Plan on European sites and has determined no significant effects.</p> <p>The Draft Haslemere Neighbourhood Plan also sets out policies relating to the local economy, design, protection of the environment, sustainability and the type of housing needed (not the quantum) which should be generally positive.</p>	N
(e) The relevance of the plan or programme for the implementation of Community (EU) legislation on the environment (for example, plans and programmes linked to waste management or	The Draft Neighbourhood Plan sets out policies on the local economy, design, protection of the environment, sustainability and the type of housing needed (not the quantum). This includes Policy H3 which deals with building performance and biodiversity as well as policies H6 which deal with sustainable transport, H7 with high design quality, H11 which deals with habitats	N

Criteria (from Annex II of SEA Directive and Schedule I of the Regulations)	Response	
water protection).	and H14 dealing with wildlife corridors. As such, the Neighbourhood Plan could aid in the implementation of other EU legislation.	
<b>Characteristics of the effects and of the area likely to be affected</b>		
(a) The probability, duration, frequency and reversibility of the effects.	<p>The Draft Neighbourhood Plan does not allocate any land or sites for development but does set a framework for decision making specifically in terms of the local economy, design, protection of the environment, sustainability and the type of housing needed. Taken together these policies have a high probability of securing positive effects in the medium-long term.</p> <p>Effects will be relatively permanent with a high degree of frequency and should be generally positive given the requirements set out in the policies of the plan with respect to the built and natural environment, sustainable transport as well as provision for net gains in biodiversity and water resource.</p> <p>Positive effects could be reversible in the longer term, depending on future policy approaches beyond the plan period.</p>	N
(b) The cumulative nature of the effects	The Draft Neighbourhood Plan sets out policies relating to the local economy, design, protection of the environment, sustainability and the type of housing needed. These policy approaches when taken in combination with the SSSIs, Site of Nature Conservation Importance designations, priority habitats and adopted policies in the Waverley Local Plan Part 1 2013-2032 as well as saved Policy NRM6 of the South East Plan should provide cumulative effects which are likely to be positive with respect to design, sustainable design and water/energy resource, biodiversity, natural and built environments and sustainable transport..	N
(c) The transboundary nature of the effects	Given the geographic scope of the Neighbourhood Plan, it is considered that no transboundary effects will arise.	N
(d) The risks to human	None.	N

Criteria (from Annex II of SEA Directive and Schedule I of the Regulations)	Response	
health or the environment (for example, due to accidents)		
(e) The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)	The Neighbourhood Plan will cover the whole of the geographic area of Haslemere Town Council in Surrey. The area covered is 2,330ha with a population of around 17,600. Given the scale and nature of the Neighbourhood Plan and taking its policies as a whole, it is considered that effects are unlikely to be significant.	N
(f) The value and vulnerability of the area likely to be affected due to: i) Special natural characteristics or cultural heritage; ii) Exceeded environmental quality standards or limit values; iii) Intensive land-use.	Given the nature of the Neighbourhood Plan:  i) The Neighbourhood Plan contains 1 SSSI in a favourable condition status and one SSSI lies adjacent the plan boundary in an unfavourable but recovering status which meets the PSA target of 95% in favourable or unfavourable recovering condition status. The plan area contains numerous statutorily or locally listed buildings and structures as well as three conservation areas, a scheduled ancient monument and one geological site. The area is a mixture of urban and rural character and contains features such as green spaces, wooded copses and agricultural field patterns as well as the urban areas of Haslemere, Hindhead, Beacon Hill and Grayswood. The Draft Neighbourhood Plan refers to objectives and policies relating to design, protection of the environment, sustainable design, sustainable transport and protection of habitats and wildlife which should generally have positive effects for the built and natural environment.  ii) There are no Air Quality Management Areas in the Neighbourhood Plan area and air quality standards are not exceeded at any of the 7 air quality monitoring sites in the Neighbourhood Plan area <sup>2</sup> . Whilst the Environment Agency has identified the Wey and Arun & Western Streams catchments as	N

<sup>2</sup> Waverley 2016 Air Quality Annual Status Report (2018) WBC, Available at: [https://www.waverley.gov.uk/downloads/file/5995/2016\\_air\\_quality\\_annual\\_status\\_report](https://www.waverley.gov.uk/downloads/file/5995/2016_air_quality_annual_status_report)



Criteria (from Annex II of SEA Directive and Schedule I of the Regulations)	Response	
	<p>having restricted water available for licensing, the Neighbourhood Plan policies do not contain pathways for effect on the water environment.</p> <p>iii) None identified, given the semi-rural nature of the area, agricultural use could be considered an intensive land use, but the control of this is largely beyond the remit of the Neighbourhood Plan. Intensive land use could occur in the urban areas (built development), but the Plan does not allocate any land or sites for development and as such there is no pathway for significant effects.</p>	
(g) The effects on areas or landscapes which have recognised national, community or international protection status.	The effects on European Sites for Nature Conservation are dealt with in (d) above. In any event, an HRA screening assessment has determined no likely significant effects. Part of the Neighbourhood Plan area lies within the Surrey Hills Area of Outstanding Natural Beauty (AONB), however the policy requiring high quality design should generally have positive effect on this designation.	N
<b>Conclusion</b>	<b>The Haslemere Neighbourhood Plan is unlikely to give rise to significant environmental effects and as such an SEA is not required.</b>	

1.43 On the basis of the Screening process it is determined that the Haslemere Neighbourhood Plan does not require an SEA under the SEA Directive and Environmental Assessment of Plans and Programmes Regulations (2004). This is because: -

- The plan does not allocate any land or sites for development; and
- The policies of the plan when taken as a whole and in combination with other policies in the adopted Waverley Local Plan Part 1 2013-2032 will likely have positive effects.

1.44 Waverley Borough Council as the competent authority undertook consultation with the three statutory bodies (Environment Agency, Historic England, Natural England) on the findings of a draft SEA/HRA screening assessment dated July 2019. The consultation took place between 13<sup>th</sup> August and 13<sup>th</sup> September 2019. The response from the three statutory bodies is set out in Table 1-13.

**Table 1-13: Consultation Responses from Statutory Bodies**

<b>Statutory Body</b>	<b>Response</b>	<b>Comment</b>
Environment Agency	Due to resourcing issues, unable to make any detailed input on neighborhood plans being prepared within the local authority area	Noted.
Historic England	No comment	Noted.
Natural England	Agree with the conclusions of the screening report particularly as this Plan is not allocating development sites. Full Habitats Regulations Appropriate Assessment and Strategic Environmental Assessment is not required.	Agreement with need for full Appropriate Assessment noted.

- 1.45 Given the findings of this screening assessment and responses from the statutory bodies it is considered that a Strategic Environmental Assessment and an Appropriate Assessment are not required.
- 1.46 This final SEA/HRA screening assessment was made on the 16<sup>th</sup> September 2019.