



Waverley Climate Change and Sustainability SPD

Habitats Regulations Assessment Screening

Waverley Borough Council

Final report

Prepared by LUC

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Contents

Chapter 1	4
Introduction	
Overview of the Climate Change and Sustainability SPD	4
The requirement to undertake Habitats Regulations Assessment	6
Stages of HRA	8
Relevant case law	11
Chapter 2	15
HRA Screening	
Identification of European sites	15
Potential likely significant effects of the SPD alone	18
Potential likely significant effects of the SPD in-combination with other plans and programmes	19
Chapter 3	20
Conclusions	
Next steps	20
References	21

Chapter 1

Introduction

1.1 Waverley Borough Council (WBC) is in the process of preparing a Climate Change and Sustainability Supplementary Planning Document (SPD). LUC has been commissioned by the Council to carry out Habitats Regulations Assessment (HRA) Screening of the SPD on its behalf. The purpose of this screening report is to determine whether the SPD has potential to result in likely significant effects on any European sites (see Chapter 2 for an explanation of which sites are considered).

1.2 A Draft SPD has been prepared by LUC on behalf of the Council, which will be subject to consultation with relevant stakeholders and the public. This report presents a screening assessment of the Draft SPD and should be read in conjunction with that document. If the SPD is subsequently updated, this HRA should be reviewed to determine whether any updates are required in the light of such changes.

Overview of the Climate Change and Sustainability SPD

1.3 The SPD provides further guidance on Local Plan policies relating to sustainable transport, sustainable construction and design, climate change and renewable energy. The purposes of the SPD are as follows:

- Provide guidance on how to apply relevant Local Plan policies and what the applicants are required to deliver.
- Clarify what information should be provided with planning applications.
- Demonstrate what is possible and appropriate for developments in Waverley.

- Provide best practice / exemplar developments.
- Provide links to latest guidance and codes of practice.

1.4 The SPD is part of WBC's response to the climate emergency and is being prepared in line with WBC's Climate Change and Sustainability Strategy [See **reference 1**], which sets out that WBC will use legislation, Local Plans and Supplementary Planning Documents to ensure developments are sustainable, energy efficient and use renewable energy and Passivhaus standards where possible.

1.5 The SPD supports the adopted Waverley Borough Local Plan Part 1, which sets out strategic policies relating to land use and development proposals for strategic allocated sites. It provides further guidance on the implementation of the following Local Plan policies:

- **ST1: Sustainable Transport**, which sets out a number of criteria including requirements to ensure that opportunities for sustainable transport modes are exploited and that the necessary transport infrastructure is delivered.
- **CC1: Climate Change**, which sets out requirements for development in order to move to a low carbon future and promotes development that seeks to mitigate and adapt to climate change through renewable and low carbon energy supply, ensuring flood storage capacity, ensuring resilience to climate risks, provides green infrastructure, SUDs and habitat networks.
- **CC2: Sustainable Construction and Design**, which sets out requirements for development to contribute to reducing GHG emissions by ensuring minimising energy, waste, and water use, taking advantage of natural lighting and ventilation, encouraging active transport, providing higher density, and enhancing biodiversity.
- **CC3: Renewable Energy Development**, which sets out requirements for new renewable energy developments to ensure that they avoid any potential negative impacts on landscape, wildlife, heritage assets and amenity.
- **CC4: Flood Risk Management**, which sets out requirements for development to ensure development is at minimal risk from flooding, does

not increase the risk of flooding elsewhere, and ensures that residual flood risk is safely managed, including through the use of sustainable drainage systems (SuDS).

- NE1: Biodiversity and Geological Conservation, which sets out the need for development to conserve and enhance biodiversity and geological interest, including protection of designated sites and avoidance and mitigation of adverse effects.
- NE2: Green and Blue Infrastructure, which sets out requirements for development to contribute to the protection and enhancement of the river corridor and canal network, habitat creation and connectivity, and trees, woodland and hedgerows.

1.6 The SPD introduces a requirement for the above policies to be considered at the earliest stage of the development process. Applicants are required to demonstrate how these policies have been considered and to submit a Climate Change and Sustainability checklist as part of planning applications. The SPD is not directly connected with or necessary to the management of any European sites.

The requirement to undertake Habitats Regulations Assessment

1.7 The requirement for HRA is set out in the Habitats Regulations published for England and Wales in 2007 [See reference 2]; the currently applicable version is the Habitats Regulations 2017, as amended [See reference 3]. When preparing development plan documents such as the SPD, WBC is required to consider whether the document has potential to result in likely significant effects on any European site (the SPD is considered to be a 'plan' for the purposes of HRA). WBC can commission consultants to undertake HRA work on its behalf and this (the work documented in this report) is then reported to and considered by WBC as the 'competent authority'. WBC will consider this work and would usually [See reference 4] only progress a plan if it considers that the plan will not adversely affect the integrity [See reference 5] of any 'European site', as

defined below. The requirement for authorities to comply with the Habitats Regulations when preparing a Plan is also noted in the Government's online Planning Practice Guidance [\[See reference 6\]](#) (PPG).

1.8 HRA refers to the assessment of the potential effects of a plan on one or more sites afforded the highest level of protection in the UK: SPAs and SACs. These were classified under European Union (EU) legislation but, since 1st January 2021, are protected in the UK by the Habitats Regulations 2017 (as amended). Although the EU Directives from which the UK's Habitats Regulations originally derived are no longer binding, the Regulations still make reference to the lists of habitats and species that the sites were designated for, which are listed in annexes to the EU Directives:

- SACs are designated for particular habitat types (specified in Annex 1 of the EU Habitats Directive [\[See reference 7\]](#)) and species (Annex II).
- SPAs are classified for rare and vulnerable birds (Annex I of the EU Birds Directive [\[See reference 8\]](#)), and for regularly occurring migratory species not listed in Annex I.

1.9 The term 'European sites' was previously commonly used in HRA to refer to 'Natura 2000' sites [\[See reference 9\]](#) and Ramsar sites (international designated under the Ramsar Convention). However, a Government Policy Paper [\[See reference 10\]](#) on changes to the Habitats Regulations 2017 post-Brexit states that:

- Any references to Natura 2000 in the 2017 Regulations and in guidance now refers to the new 'national site network'.
- The national site network includes existing SACs and SPAs; and new SACs and SPAs designated under these Regulations.
- Designated Wetlands of International Importance (known as Ramsar sites) do not form part of the national site network. Many Ramsar sites overlap with SACs and SPAs and may be designated for the same or different species and habitats.

1.10 Although Ramsar sites do not form part of the new national site network, the Government Policy Paper [See reference 11] confirms that all Ramsar sites remain protected in the same way as SACs and SPAs. In LUC's view, and unless the Government provides any guidance to the contrary, potential effects on Ramsar sites should continue to form part of the HRA of plans and projects since the requirement for HRA of plans and projects that might adversely affect Ramsar sites forms an essential part of the protection confirmed by the Government Policy Paper. Furthermore, the NPPF [See reference 12] and practice guidance [See reference 13] currently still state that competent authorities responsible for carrying out HRA should treat Ramsar sites in the same way as SACs and SPAs.

1.11 The requirement for HRA does not apply to other nationally designated wildlife sites such as Sites of Special Scientific Interest or National Nature Reserves; therefore, for clarity, this report uses the term 'European sites' rather than 'national site network'.

1.12 The overall purpose of the HRA is to conclude whether or not a proposal or policy, or whole development plan would adversely affect the integrity of the site in question. This is judged in terms of the implications of the plan for a site's 'qualifying features' (i.e. those Annex I habitats, Annex II species, and Annex I bird populations for which it has been designated). Significantly, HRA is based on the precautionary principle. Where uncertainty or doubt remains, an adverse effect should be assumed.

Stages of HRA

1.13 The stages of HRA are presented below, based on various guidance documents [See reference 14] [See reference 15]. This document presents the findings of Stage 1: Screening.

- Stage 1: Screening (the 'Significance Test'), which includes:

- Description of the development plan and confirmation that it is not directly connected with or necessary to the management of European sites.
- Identification of potentially affected European sites and their conservation objectives **[See reference 16]**.
- Review of other plans and projects.
- Assessment of likely significant effects of the development plan alone or in combination with other plans and projects, prior to consideration of avoidance or reduction ('mitigation') measures **[See reference 17]**.
- Where effects are unlikely, prepare a 'finding of no significant effect report'. Where effects judged likely, or lack of information to prove otherwise, proceed to Stage 2.
- Stage 2: Appropriate Assessment (the 'Integrity Test'), which includes:
 - Information gathering (development plan and data on European sites **[See reference 18]**).
 - Impact prediction.
 - Evaluation of development plan impacts in view of conservation objectives of European sites.
 - Where impacts are considered to directly or indirectly affect qualifying features of European sites, identify how these effects will be avoided or reduced ('mitigation').
 - Preparation of an Appropriate Assessment report describing the plan, European site baseline conditions, the adverse effects of the plan on the European site, how these effects will be avoided through, firstly, avoidance, and secondly, mitigation including the mechanisms and timescale for these mitigation measures. If effects remain after all alternatives and mitigation measures have been considered proceed to Stage 3.
- Stage 3: Assessment where no alternatives exist and adverse impacts remain taking into account mitigation, which includes:

- Identify and demonstrate ‘imperative reasons of overriding public interest’ (IROPI).
- Demonstrate no alternatives exist.
- Identify potential compensatory measures.
- This stage should be avoided if at all possible. The test of IROPI and the requirements for compensation are extremely onerous.

1.14 In assessing the effects of the SPD in accordance with Regulation 105 of the Habitats Regulations (as amended), there are potentially two tests to be applied by the competent authority: a ‘Significance Test’, followed, if necessary, by an Appropriate Assessment which will inform the ‘Integrity Test’. The relevant sequence of questions is as follows:

- Step 1: Under Reg. 105(1)(b), consider whether the plan is directly connected with or necessary to the management of the sites. If not –
- Step 2: Under Reg. 105(1)(a) consider whether the plan is likely to have a significant effect on the site, either alone or in combination with other plans or projects (the ‘Significance Test’). [These two steps are undertaken as part of Stage 1: Screening shown in Table 1.1 above.] If Yes –
- Step 3: Under Reg. 105(1), make an Appropriate Assessment of the implications for the site in view of its current conservation objectives (the ‘Integrity Test’). In so doing, it is mandatory under Reg. 105(2) to consult Natural England, and optional under Reg. 105(3) to take the opinion of the general public. [This step is undertaken during Stage 2: Appropriate Assessment]
- Step 4: In accordance with Reg.105(4), but subject to Reg.107, give effect to the land use plan only after having ascertained that the plan will not adversely affect the integrity of the European site.

1.15 It is normally anticipated that an emphasis on Stages 1 and 2 of this process will, through a series of iterations, help ensure that potential adverse effects are identified and eliminated through the avoidance of likely significant effects at Stage 1, and through Appropriate Assessment at Stage 2 by the inclusion of mitigation measures designed to avoid, reduce or abate effects. The

need to consider alternatives could imply more onerous changes to a plan document. It is generally understood that so called ‘imperative reasons of overriding public interest’ (IROPI) are likely to be justified only very occasionally and would involve engagement with the Government.

1.16 The HRA should be undertaken by the ‘competent authority’ - in this case WBC, and LUC has been commissioned to do this on its behalf. HRA also requires close working with Natural England as the statutory nature conservation body in order to obtain the necessary information and agree the process, outcomes and any mitigation proposals.

Relevant case law

1.17 This HRA screening report has been prepared in accordance with relevant case law findings, including most notably the ‘People over Wind’ and ‘Holohan’ rulings from the Court of Justice for the European Union (CJEU).

1.18 The People over Wind, Peter Sweetman v Coillte Teoranta (April 2018) judgment ruled that Article 6(3) of the Habitats Directive should be interpreted as meaning that mitigation measures should be assessed as part of an Appropriate Assessment and should not be taken into account at the screening stage. The precise wording of the ruling is as follows:

“Article 6(3)must be interpreted as meaning that, in order to determine whether it is necessary to carry out, subsequently, an appropriate assessment of the implications, for a site concerned, of a plan or project, it is not appropriate, at the screening stage, to take account of measures intended to avoid or reduce the harmful effects of the plan or project on that site.”

1.19 In light of the above, this HRA screening report does not rely upon avoidance or mitigation measures to draw conclusions as to whether the SPD could result in likely significant effects on European sites, with any such measures being considered at the Appropriate Assessment stage as relevant.

1.20 This HRA screening report also fully considers the *Holohan v An Bord Pleanala* (November 2018) judgement which stated that:

Article 6(3) of Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora must be interpreted as meaning that an ‘appropriate assessment’ must, on the one hand, catalogue the entirety of habitat types and species for which a site is protected, and, on the other, identify and examine both the implications of the proposed project for the species present on that site, and for which that site has not been listed, and the implications for habitat types and species to be found outside the boundaries of that site, provided that those implications are liable to affect the conservation objectives of the site.

Article 6(3) of Directive 92/43 must be interpreted as meaning that the competent authority is permitted to grant to a plan or project consent which leaves the developer free to determine subsequently certain parameters relating to the construction phase, such as the location of the construction compound and haul routes, only if that authority is certain that the development consent granted establishes conditions that are strict enough to guarantee that those parameters will not adversely affect the integrity of the site.

Article 6(3) of Directive 92/43 must be interpreted as meaning that, where the competent authority rejects the findings in a scientific expert opinion recommending that additional information be obtained, the ‘appropriate assessment’ must include an explicit and detailed statement of reasons

capable of dispelling all reasonable scientific doubt concerning the effects of the work envisaged on the site concerned.

1.21 This HRA screening report has therefore involved considering the potential for effects on species and habitats, including those not listed as qualifying features, to result in secondary effects upon the qualifying features of European sites, including the potential for complex interactions and dependencies. In addition, the potential for offsite impacts, such as through impacts to functionally linked land, and or species and habitats located beyond the boundaries of European site, but which may be important in supporting the ecological processes of the qualifying features, has also been fully considered in this report.

1.22 The approach to the HRA screening also takes into consideration the 'Wealden' judgement and the 'Dutch Nitrogen Case' judgements from the Court of Justice for the European Union.

1.23 Wealden District Council v Secretary of State for Communities and Local Government, Lewes District Council and South Downs National Park Authority (2017) ruled that it was not appropriate to scope out the need for a detailed assessment for an individual plan or project based on the annual average daily traffic (AADT) figures detailed in the Design Manual for Roads and Bridges or the critical loads used by Defra or Environmental Agency without considering the in-combination impacts with other plans and projects.

1.24 In light of this judgement, the HRA should therefore consider traffic growth based on the effects of development from the SPD in combination with other drivers of growth such as development proposed in neighbouring districts and demographic change.

1.25 The 2018 'Coöperatie Mobilisation for the Environment and Vereniging Leefmilieu (Dutch Nitrogen)' judgement stated that:

“...the positive effects of the autonomous decrease in the nitrogen deposition...be taken into account in the appropriate assessment..., it is important that the autonomous decrease in the nitrogen deposition be monitored and, if it transpires that the decrease is less favourable than had been assumed in the appropriate assessment, that adjustments, if required, be made.”

1.26 The Dutch Nitrogen judgement also states that according to previous case law:

“...it is only when it is sufficiently certain that a measure will make an effective contribution to avoiding harm to the integrity of the site concerned, by guaranteeing beyond all reasonable doubt that the plan or project at issue will not adversely affect the integrity of that site, that such a measure may be taken into consideration in the ‘appropriate assessment’ within the meaning of Article 6(3) of the Habitats Directive.”

1.27 HRA screening of the SPD therefore only considers the existence of conservation and/or preventative measures if the expected benefits of those measures are certain at the time of the assessment.

Chapter 2

HRA Screening

2.1 This chapter sets out the findings of the screening stage of the HRA.

Identification of European sites

2.2 In order to initiate the search of European sites that could potentially be affected by a plan, it is established practice in HRAs to consider European sites within the local planning authority area covered by the plan, and other sites that may be affected beyond this area.

2.3 All European sites lying wholly or partly within 15km of Waverley Borough were included to reflect the fact that development resulting from a plan may affect European sites which are located outside the administrative boundary of Waverley. This distance has generally been considered reasonable by Natural England in other Local and Neighbourhood Plan HRAs to ensure that all designated sites that could potentially be affected by development are identified and included in the assessment. Consideration was given to other pathways by which the SPD could affect sites further than 15k from the Borough, but none were identified.

2.4 There are five European sites that lie wholly or partly within the Borough:

- Thames Basin Heaths SPA.
- Thursley, Ash, Pirbright and Chobham SAC.
- Thursley, Hankley and Frensham Commons SPA (Wealden Heaths Phase I).
- Thursley and Ockley Bog Ramsar.
- Wealden Heaths Phase II SPA.

2.5 The following European sites lie within 15km of the Borough:

- Arun Valley SPA and Ramsar.
- East Hampshire Hangers SAC.
- Ebernoe Common SAC.
- Mole Gap to Reigate Escarpment SAC.
- Shortheath Common SAC.
- Singleton and Cocking Tunnels SAC.
- The Mens SAC.
- Woolmer Forest SAC.

2.6 The HRA of the Local Plan Part 1 [See reference 19] also included Rook Cliff SAC and Duncton to Bignor Escarpment SAC, which lie just further than 15km from the Borough, and Buster Hill SAC, which lies around 19km from the Borough. According to the HRA of the Local Plan Part 1 (2016), European sites were identified primarily because they lie within the distance over which visitors from Waverley Borough are likely to make recreational day visits. The SPD is not expected to result in any increase in population or visits to these sites. Therefore, while Rook Cliff SAC has not been included, the following sites have been included in this HRA because they are directly linked to Waverley Borough via the strategic road network:

- Duncton to Bignor Escarpment SAC.
- Buster Hill SAC.

Conservation objectives

2.7 The conservation objectives for all SACs and SPAs are similar. Conservation objectives for SACs tend to reflect the following:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of the qualifying natural habitats
- The structure and function (including typical species) of the qualifying natural habitats, and,
- The supporting processes on which the qualifying natural habitats rely.

2.8 Conservation objectives for SPAs tend to reflect the following:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

- The extent and distribution of the habitats of the qualifying features
- The structure and function of the habitats of the qualifying features
- The supporting processes on which the habitats of the qualifying features rely
- The population of each of the qualifying features, and,
- The distribution of the qualifying features within the site.

2.9 Conservation objectives are not set out for Ramsar sites, but as Thursley and Ockley Bog Ramsar site partly overlies Thursley, Hankley and Frensham Commons SPA, the conservation objectives set out above are likely to be relevant.

Potential likely significant effects of the SPD alone

2.10 This HRA Screening considers the types of effects that could significantly affect European sites, which could arise from development plan documents in general. It then considers whether such effects are likely to arise as a result of the Climate Change and Sustainability SPD. The potential types of effects considered are set out below, which are drawn from LUC's extensive HRA experience:

- Physical damage / loss of habitat (including habitat fragmentation).
- Non-physical disturbance (noise, vibration, visual disturbance and light).
- Air pollution.
- Recreational disturbance.
- Predation of qualifying species by pet cats.
- Changes to water quantity, quality and hydrology.
- Non-toxic contamination (dust).
- Toxic contamination.
- Biological disturbance (such as that caused by invasive species).

2.11 The SPD will not directly result in development; rather it adds guidance and clarity to development that is allocated (or will otherwise be permitted, such as windfall development) through the Local Plan. The SPD highlights existing guidance, provides further guidance, and sets out how applicants must demonstrate they have incorporated considerations such as:

- Minimising energy use and carbon emissions.
- Optimising development orientation and density.
- Incorporating green and blue infrastructure and sustainable drainage systems (SuDS).

- Ensuring development is resilient to climate change, particularly minimising risk of flooding.
- Sustainable use of resources and materials.
- Sustainable management of waste.
- Maximising water efficiency and re-use.
- Encourage use of sustainable forms of transport and reducing the need to travel by car.

2.12 In addition, applicants are encouraged to achieve at least 10% biodiversity net gain and to demonstrate how they will achieve this.

2.13 These measures are expected to benefit the natural environment generally and are not expected to result in likely significant effects on any European sites. Furthermore, the SPD adds further detail and guidance to policies ST1: Sustainable Transport; CC1: Climate Change; CC2: Sustainable Construction and Design; CC3: Renewable Energy Development; CC4: Flood Risk Management; NE1: Biodiversity and Geological Conservation; and NE2: Green and Blue Infrastructure of the Local Plan Part 1, all of which were concluded in the HRA of the Local Plan Part 1 (2016) to have no HRA implications.

Potential likely significant effects of the SPD in-combination with other plans and programmes

2.14 Given that no pathway has been identified by which the SPD could result in likely significant effects on any European site, there is no pathway by which in-combination effects could occur. As such, the SPD is not expected to result in likely significant effects on any European site in combination with any other plans or programmes.

Chapter 3

Conclusions

3.1 This HRA Screening has determined that the Waverley Climate Change and Sustainability SPD will not result in likely significant effects on any European site, either alone or in combination with any other plans or programmes. This is because the SPD will not result in development and instead seeks to minimise the potential negative environmental impacts of development and to maximise positive environmental impacts.

Next steps

3.2 This HRA Screening Report will be subject to consultation with Natural England. Once any consultation responses are received, this document will be revised and updated if necessary.

LUC

March 2022

References

- 1 Waverley Borough Council (2020) Climate Change and Sustainability Strategy. Available at:
<https://www.waverley.gov.uk/Portals/0/Documents/services/environmental-concerns/climate%20change/Waverley%20Climate%20Change%20and%20Sustainability%20Strategy%202020-2030.pdf?ver=p5MtCQyQ4W0Ve0WDKpdZEA%3d%3d>
- 2 The Conservation (Natural Habitats, &c.) (Amendment) Regulations 2007 (2007) SI No. 2007/1843. TSO (The Stationery Office), London
- 3 The Conservation of Habitats and Species Regulations 2017 (2017) SI No. 2017/1012, as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (SI 2019/579)
- 4 The exception to this would be where 'imperative reasons of overriding public interest' can be demonstrated
- 5 The integrity of a site is the coherence of its ecological structure and function, across its whole area, that enables it to sustain the habitat, complex of habitats and/or the levels of populations of the species for which it was designated. (Source: UK Government Planning Practice Guidance)
- 6 <https://www.gov.uk/guidance/appropriate-assessment>
- 7 Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora (the 'Habitats Directive')
- 8 Directive 2009/147/EC of 30 November 2009 on the conservation of wild birds (the 'Birds Directive')
- 9 The network of protected areas identified by the EU:
https://ec.europa.eu/environment/nature/natura2000/index_en.htm
- 10 <https://www.gov.uk/government/publications/changes-to-the-habitats-regulations-2017/changes-to-the-habitats-regulations-2017>
- 11 <https://www.gov.uk/government/publications/changes-to-the-habitats-regulations-2017/changes-to-the-habitats-regulations-2017>

References

- 12 NPPF para 176, available from <https://www.gov.uk/guidance/national-planning-policy-framework>
- 13 The HRA Handbook, Section A3. David Tyldesley & Associates, a subscription based online guidance document: <https://www.dtapublications.co.uk/handbook/European>
- 14 UK Government Planning Practice Guidance, available from <https://www.gov.uk/guidance/appropriate-assessment>
- 15 The HRA Handbook. David Tyldesley & Associates, a subscription based online guidance document: <https://www.dtapublications.co.uk/handbook/>
- 16 Conservation objectives are published by Natural England for SACs and SPAs
- 17 In line with the CJEU judgment in Case C-323/17 People Over Wind v Coillte Teoranta, mitigation must only be taken into consideration at this stage and not during Stage 1: HRA Screening
- 18 In addition to SAC and SPA citations and conservation objectives, key information sources for understanding factors contributing to the integrity of the sites include (where available) conservation objectives supplementary advice and Site Improvement Plans prepared by Natural England: <http://publications.naturalengland.org.uk/category/5458594975711232>
- 19 AECOM (2016) Waverley Borough Council Local Plan Part 1: Strategic Policies and Sites. Pre-Submission Draft (July 2016) Habitats Regulations Assessment. Available at: https://www.waverley.gov.uk/Portals/0/Documents/services/planning-and-building/planning-strategies-and-policies/local-plan/Local%20Plan%20Part%201%20examination/CD1_22_Local_Plan_HRA_August_2016_for_consultation_180816_update_CLEAN.pdf?ver=Jx1VH3tCN3gdhpnuB-TheQ%3d%3d

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