

## Habitats Regulations Assessment of East Horsley Neighbourhood Plan including Appropriate Assessment of policy EH-H8

July 2018

### 1. Background

1.1 The East Horsley Neighbourhood Plan was produced by East Horsley Parish Council and was submitted to the Council in July 2017. In accordance with legislation, the plan was subject to a consultation, examination and referendum by the Council. The Council is now required to make (adopt) the plan, unless doing so would breach or otherwise be incompatible with European obligations<sup>1</sup>.

#### European sites

- 1.2 Guildford borough contains several areas of land that fall within the Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC) and/or the Thames Basin Heaths Special Protection Area (the SPA). Parts of Guildford borough also fall within the vicinity of the Mole Gap to Reigate Escarpment SAC. SACs and SPAs are 'European sites'; sites designated by the EU and benefitting from European protection. This protection has been codified into UK law through the Conservation of Habitats and Species Regulations 2017 (the 'Habitats Regulations'). For further information about these sites, see the East Horsley Neighbourhood Plan Habitats Regulations Assessment screening report at **Annex 1**.
- 1.3 The SPA is located in an area under considerable development pressure and as a result has suffered fragmentation. The heathland habitat is vulnerable to the effects of urbanisation (e.g. flytipping and encroachment) and the three European protected bird species for which the SPA is designated are vulnerable to predation by cats, rats and crows and to disturbance from recreational pressure.
- 1.4 A regional approach to protecting the SPA has been established through policy NRM6 of the South East Plan. The approach includes the following principles.
- Within 400 metres of the SPA - a prohibition on new residential development, and other development likely to lead to adverse effects on the SPA.
  - Between 400 metres and 5 km of the SPA – net new residential development will lead to impacts on the SPA through increased recreational pressure.
  - Between 5 and 7 km of the SPA – large residential developments (greater than 50 homes) may lead to impacts on the SPA through increased recreational pressure, established on a case by case basis.
  - The impacts on the SPA from net new residential development must be avoided and mitigated through the provision of Suitable Alternative Natural Greenspace (SANG) and Strategic Access Management and Monitoring (SAMM).

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<sup>1</sup> Under s.38A(6) of PCP 2004. The LPA must also refuse to make the plan if it would breach or be incompatible with any of the Convention rights (within the meaning of the Human Rights Act 1998). However this is not applicable to the appropriate assessment

- 1.5 The East Horsley Neighbourhood Area falls partially within the 400 to 5 km zone, partially within the five to seven km zone and partially beyond 7 kilometres. It is also 4.7km west of the Mole Gap to Reigate Escarpment SAC.
- 1.6 The Habitats Regulations sets out an approach to protecting the European sites. In particular, in relation to land use plans (including neighbourhood plans) it requires the following:
  - Where a land use plan is not directly connected with or necessary to the management of the European site, there must be an initial consideration of whether the plan is likely to have a significant effect on the site (sometimes referred to as a 'screening assessment') , and;
  - if the screening assessment indicates that significant effects are likely to occur an assessment of the implications for the site in view of the site's conservation objectives must be undertaken. This is known as an appropriate assessment.
- 1.7 Save where there are imperative reasons for overriding public importance , the Council is not permitted to make a plan which is likely to have significant effects, unless it has undertaken the appropriate assessment and ascertained that the plan will not adversely affect the integrity of the European site.
- 1.8 In April 2018, the European Court handed down judgement C-323/17 (commonly referred to as the Sweetman judgement) which has clarified the correct approach to this process. Prior to the judgement, avoidance and mitigation measures had been considered at the screening stage and 'likely significant effects' have been 'screened out' based on those measures. The Sweetman judgement has clarified that avoidance and mitigation measures should not be used to 'screen out likely significant effects'; instead, avoidance and mitigation measures must only be considered at as part of the appropriate assessment stage.

## 2. Screening of policy EH-H8

- 2.1 The September 2017 East Horsley Neighbourhood Plan Strategic Environmental Assessment and Habitats Regulations Assessment screening determination (see **Background documents**) screened out all the policies in the plan from having likely significant effects on European sites and concluded that an appropriate assessment was therefore not necessary. The Council has reviewed the determination in light of the Sweetman judgement and finds that it is compliant with this judgment except where it screened-out the following two policies:
  - EH-H8: Residential re-builds (deleted), and
  - EH-H9: Residential infilling
- 2.2 Policy EH-H8 Residential re-builds was deleted from the plan following the recommendations in the examination report. Therefore, only policy EH-H9, which was renamed to 'EH-H8: Residential infilling' (following the deletion of 'EH-H8: Residential re-builds') in the final (referendum) version of the plan, must be reconsidered.
- 2.3 Except for the two policies above, the screening assessment is compliant with the Sweetman judgement because the policies were screened out for likely significant effects on the basis that no impacts were present, not because avoidance and mitigation measures would reduce or avoid impacts.

- 2.4 EH-H8: Residential infilling is a general policy that supports residential infilling. The screening assessment states (see **Appendix 1**, page 21):

*“... Given that East Horsley neighbourhood area falls 2.2km south-east of the Thames Basin Heaths SPA and 4.7km west of the Mole Gap to Reigate Escarpment SAC there will be no direct impact upon these sites from these policies, however, indirect impacts may occur... Specifically, in relation to the SPA the neighbourhood area is outside the 400m exclusion zone where there is a presumption against additional net new dwellings due to the pressure of increased recreational use. However, the northern part of the neighbourhood area does fall within the 5km Zone of Influence and as discussed in Table 3-7, avoidance measures within the 5km Zone of Influence include the provision of SANG. However, GBC (2015) detail in their Avoidance Strategy that developments of less than 10 dwellings within 5km of the SPA do not need to be within a specified distance of SANG provided that a sufficient quantity and quality of SANG land to cater for the consequent increase in population is identified and available in the borough and functional in advance of completion. Given that GBC (2015) identifies five SANG sites which have been approved by Natural England, along with another two potential sites, it is considered there is sufficient SANG available within Guildford Borough to avoid impacts on the SPA from these small-scale developments.”*

- 2.5 Whilst the screening assessment does not specifically identify ‘likely significant effects’, it does identify potential “*indirect impacts*” on the SPA and the Mole Gap to Reigate Escarpment SAC, and then proceeds to discuss mitigation. Given the lack of clarity, and particularly in light of the ‘precautionary principle’ which applies to all such assessments, the Council considers that the reference to ‘indirect impacts’ should be considered ‘likely significant effects’ for the purposes of the Habitats Regulations. Therefore, in order to be consistent with the EU and domestic legislation in light of the Sweetman judgement, it is necessary for policy EH-H8 to undergo an appropriate assessment.
- 2.6 It is unlikely that policy EH-H8 will lead to significant effects on the SPA as a result of development coming forward under this policy which is within 5-7km of the SPA. This is because only large scale residential developments (over 50 homes) in this zone are considered likely to have an impact on the SPA and the policy only deals with small-scale developments that are likely to fall well below this threshold. Therefore, likely significant effects on the SPA from residential development in this zone (as well as beyond 7km) can be screened out.
- 2.7 It is unlikely that policy EH-H8 will lead to significant effects on the Mole Gap to Reigate Escarpment SAC as the neighbourhood area falls outside the 800m buffer zone within which new development is prohibited and the SAC itself is subject to an action plan that minimises recreational disturbance which the neighbourhood plan policies will not impede. Therefore, likely significant effects on the Mole Gap to Reigate Escarpment SAC can also be screened out.
- 2.8 However, likely significant effects on the SPA cannot be ruled out from development coming forward under policy EH-H8 which falls within the 400m-5km zone

### **3. Appropriate Assessment of policy EH-H8**

- 3.1 This appropriate assessment should be read in conjunction with the East Horsley Neighbourhood Plan Screening Assessment, which sets out additional background information relating to HRA, the SPA and approaches to avoidance and mitigation (see **Annex 1**).
- 3.2 As described above, Policy EH-H8, if implemented without avoidance and/or mitigation measures, could lead to likely significant effects on the SPA through increased recreational pressure brought by new dwellings between 400m and 5km from the SPA. This matter is considered in the section below.

#### Potential for adverse effects on the integrity of the SPA

- 3.3 The SPA has been designated because it supports three species of birds that are protected under the Wild Birds Directive; Nightjar, Woodlark and Dartford Warbler. The conservation objectives for the site are to 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:
- 1) The extent and distribution of the habitats of the three species
  - 2) The structure and function of the habitats of the three species
  - 3) The supporting processes on which the habitats of the three species rely
  - 4) The population of each of the three species, and,
  - 5) The distribution of the three species within the site.
- 3.4 The northern part of the neighbourhood area falls within 5km of the SPA where any new net residential development is likely to have an impact on the SPA due to increased recreational pressure. The SPA is currently subject to high levels of recreational use that can lead to disturbance in the behavioural patterns of the three species, and consequently can reduce breeding success. Therefore, by supporting residential development in this zone, and without any appropriate avoidance and mitigation strategy in place, policy EH-H8 could lead to adverse effects on the integrity of the SPA through negative impacts on conservation objectives 1, 4 and 5.

#### Avoidance and mitigation measures

- 3.5 Policy NRM6 of the South East Plan and the Guildford Borough Council Thames Basin Heaths Special Protection Area Avoidance Strategy 2017 Supplementary Planning Document (the SPA strategy) set out an approach to avoidance and mitigation of the effects of increased recreational pressure. This is achieved through the provision of SANG to attract people away from the SPA and through the funding of the SAMM program which monitors the SPA and provides mitigation measures for the impact of visitors (including wardening, access management and education measures for SPA users).
- 3.6 SANGs provide an attractive natural or semi-natural environment and visitor experience equivalent to the SPA and in doing so prevent new dwellings bringing an increase in recreational pressure on the SPA by “soaking up” potential SPA visitors. In this way, adverse impacts on the integrity of the SPA from new residential developments within the 400m to 5 km zone are avoided.

- 3.7 The Council currently has a large amount of available SANG capacity across the borough. Under the terms of policy NRM6 and the SPA strategy developments of fewer than 10 dwellings, the size of development very likely to be covered by policy EH-H8, do not need to be within the catchment of any specific SANG<sup>2</sup>.
- 3.8 In the event that sites of 10 dwellings or greater are proposed, Policy NRM6 of the South East Plan and the SPA strategy would require either permission to be refused, or permission granted with a condition preventing the start of construction or occupation of new dwellings until a SANG is available.
- 3.9 Furthermore, Permission has been granted for a new SANG (Long Reach SANG) that has a catchment covering the relevant part of the neighbourhood plan area. Long Reach SANG is 24 hectares, which will provide avoidance for around 1,250 homes. The Local Plan Infrastructure Delivery Framework shows that around 20 hectares may be needed to deliver the development in the emerging Local Plan<sup>3</sup>, but that there will be four hectares spare at the end of the plan period. This is enough for just over 200 homes, more than enough to deliver the amount of homes likely to come forward under a policy governing limiting infilling.
- 3.10 Therefore, it can be concluded that any development that goes ahead as a result of policy EH-H8 will be supported by appropriate SANG and that adverse effects on the integrity of the SPA will be avoided.

#### **4. Conclusion**

- 4.1 On the basis of the above appropriate assessment and taking account of the September 2017 Habitats Regulations Screening Assessment, the Council has determined that there will be no adverse effects on the integrity of the SPA as a result of the making of the East Horsley Neighbourhood Plan. Making the plan is therefore compatible with European obligations.

#### **5. Background Documents**

- [Conservation of Habitats and Species Regulations 2017](#)
- [Guildford Borough Council Thames Basin Heaths Special Protection Area Avoidance Strategy 2017 SPD](#)
- [The South East Plan, Policy NRM6](#)
- [East Horsley Neighbourhood Plan Strategic Environmental Assessment and Habitats Regulations Assessment screening determination \(September 2017\)](#)

#### **6. Annex 1: East Horsley Neighbourhood Plan Strategic Environmental Assessment and Habitats Regulations Assessment screening determination** (See next page)

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<sup>2</sup> The basis for this approach is that individually developments of less than 10 dwellings will not have a significant impact on the SPA and that this justifies a more flexible approach in terms of SANG location, but the cumulative impact should still be addressed. See the Thames Basin Heaths Special Protection Area Delivery Framework (TBH Joint Strategic Partnership Board, 2009).

<sup>3</sup> See the Guildford Infrastructure Delivery Plan, pages 69 and 70:  
<http://www.guildford.gov.uk/newlocalplan/infrastructureanddelivery>

**Annex 1:**

**East Horsley Neighbourhood Plan Strategic Environmental Assessment and Habitats Regulations Assessment screening determination (September 2017)**

## **East Horsley Neighbourhood Plan**

### **Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) screening determination**

September 2017

#### **1. Introduction**

- 1.1 This report has been prepared to set out Guildford Borough Council's determination that the East Horsley Neighbourhood Plan 2017 – 2033 does not require a Strategic Environmental Assessment, or a full Habitats Regulations Assessment, including Appropriate Assessment (HRA stage 2), and the reasons for making that determination.

#### **Strategic Environmental Assessment**

- 1.2 Under European Union Directive 2001/42 /EC (the Strategic Environmental Assessment (SEA) Directive), specific types of plans that set the framework for the future development consent of projects must be subject to an environmental assessment. These are those plans that are likely to have significant environmental effects.
- 1.3 In accordance with the provisions of the SEA Directive, and the Environmental Assessment of Plans and Programmes Regulations (2004) (Regulation 9 (1))<sup>1</sup>, the Council must determine whether a plan requires Environmental Assessment. Where the Council determines that SEA is not required then under Regulation 9(3) the Council must prepare a statement setting out the reasons for this determination.

#### **Habitats Regulations Assessment**

- 1.4 Habitats Regulations Assessment (HRA) refers to the assessment required for any plan or project to assess the potential implications for European wildlife sites. A HRA is required to determine whether a plan or project would have significant adverse effects upon the integrity of internationally designated sites of nature conservation importance, or Natura 2000 sites. The need for HRA is set out within the EC Habitats Directive 92/43/EC and transposed into English Law by Regulation 102 of the Conservation of Habitats and Species Regulations (2010) as amended, the 'Habitats Regulations'. In accordance with Article 6 of the Habitats Directive (92/43/EEC) and Regulation 102 of the Habitats Regulations, Guildford Borough Council must determine whether a plan requires Appropriate Assessment.

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<sup>1</sup> These regulations transpose the SEA Directive into English law.

- 1.5 This document forms the Council's determination as to whether an SEA or Appropriate Assessment is required prior to making (adopting) the East Horsley Neighbourhood Plan.

### **Basic conditions**

- 1.6 Neighbourhood plans must meet the 'basic conditions' set out in the Town and Country Planning Act 1990 (as amended). A neighbourhood plans' compliance with these basic conditions is tested through examination. The basic conditions require that making the plan must not breach, and is otherwise compatible with, EU obligations, such as those in the SEA and Habitats directives.

## **2. Background**

- 2.1 The East Horsley Neighbourhood Plan (the plan) is a Neighbourhood Development Plan for the East Horsley Neighbourhood Area. The East Horsley Neighbourhood Area follows the boundary of East Horsley parish, which forms part of Clandon and Horsley ward. East Horsley is a rural parish located near the eastern boundary of Guildford borough, to the east of West Horsley and west of Effingham. The boundary of the Neighbourhood Area can be seen on the map on page 1 of the SEA and HRA Screening report.
- 2.2 Once adopted, the East Horsley Neighbourhood Plan will form part of the Development Plan for Guildford Borough. The plan will be in general conformity with the strategic policies of the adopted Guildford Local Plan 2003, which has been subject to both Strategic Environmental Assessment and Habitat Regulations Assessment.
- 2.3 As the plan allocates sites for development and provides general policies to guide development, the Council commissioned JBA Consulting to undertake a high level screening assessment. This is attached at Appendix 1. Section 5 of the screening report concludes that a full environmental assessment is not required. The report also includes a Habitats Regulations Assessment screening within section 3, which concludes that the plan will not have an adverse impact on the integrity of any European sites.

## **3. Consultation**

- 3.1 In accordance with the SEA regulations, JBA Consulting directly contacted Natural England, Historic England and the Environment Agency (the statutory 'consultation bodies' under regulations 4(1) and 9(2)) in August 2017 to consult them on the findings of the screening report. Their email asked the three consultation bodies to make a representation in writing if they disagreed with the report's determination. Natural England responded to state that they agreed with the report's conclusions in relation to there being no need for SEA and HRA. The other two statutory bodies did not reply to the email, so it was assumed that they had also agreed in relation to their being no need for SEA. A copy of the email sent to the consultation bodies is at Appendix 2 and the email from Natural England to the Council is at Appendix 3.
- 3.2 The screening report and its conclusions reflect the draft (Regulation 15) Submission Version of the East Horsley Neighbourhood Plan, submitted to the Council by East Horsley Parish Council in July 2017. Therefore, the consultation bodies were given until 6<sup>th</sup> September 2017 to respond to the consultation, after which the determination was formally made. To bring the outcome of the screening process to the attention of the public, the



Council then published this screening determination on its website, along with the address where people may inspect the report or obtain a printed copy of it.

#### **4. Conclusion**

- 4.1 The Screening Report concludes firstly that SEA is not required; and secondly that no likely significant effects are likely to occur with regard to the integrity of the European sites within and around Guildford Borough due to the implementation of the Plan. The relevant statutory consultation bodies have agreed with these conclusions.
- 4.2 The Council agrees with the outcome of the screening process undertaken by the consultant, as documented in section 4 of the Screening Report attached at Appendix 1, and the conclusions in section 5 of the report. Therefore, the Council determines that the plan does not require Environmental Assessment or an Appropriate Assessment.

## **Appendix 1: SEA and HRA Screening Report**

(See next page)



# East Horsley Neighbourhood Plan 2017 - 2033 Strategic Environmental Assessment and Habitats Regulations Assessment

Screening Report

August 2017

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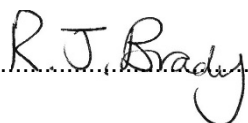
## Revision History

Revision Ref / Date Issued	Amendments	Issued to
Draft Report / February 2017	V1	Dan Knowles, Guildford Borough Council
Draft Report / February 2017	V2 - Amendments made regarding conclusions to Lollesworth Field policy	Dan Knowles, Guildford Borough Council
Final Report / August 2017	V3 - Amendments made to reflect changes in final submission version of the Neighbourhood Plan	Gavin Stonham, Guildford Borough Council

## Contract

This report describes work commissioned by Dan Knowles, on behalf of Guildford Borough Council, by an email dated 9th January 2017. Laura Thomas of JBA Consulting carried out this work.

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## Purpose

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## Abbreviations

AONB.....	Area of Outstanding Natural Beauty
DCLG .....	Department for Communities and Local Government
GBC .....	Guildford Borough Council
HRA .....	Habitats Regulations Assessment
OPDM .....	Office of the Deputy Prime Minister
PP .....	Plan or Programme
SAC.....	Special Area of Conservation
SANG.....	Suitable Alternative Natural Greenspace
SEA.....	Strategic Environmental Assessment
SNCI .....	Sites of Nature Conservation Importance
SPA.....	Special Protection Area
SSSI.....	Site of Special Scientific Interest

# 1 Introduction

A Neighbourhood Plan for the neighbourhood area of East Horsley, within the administrative area of Guildford Borough Council (GBC) in Surrey (see Figure 1-1), is currently being produced by volunteers, primarily residents of East Horsley with the support of East Horsley Parish Council. The plan is being prepared under the Localism Act 2011, and in accordance with the Neighbourhood Planning Regulations 2012. The plan covers a 17-year period from 1st January 2017 to 31st December 2033, and sets out a vision for the neighbourhood area, and a blueprint for development consistent with the objectively assessed needs and expressed opinions of residents.

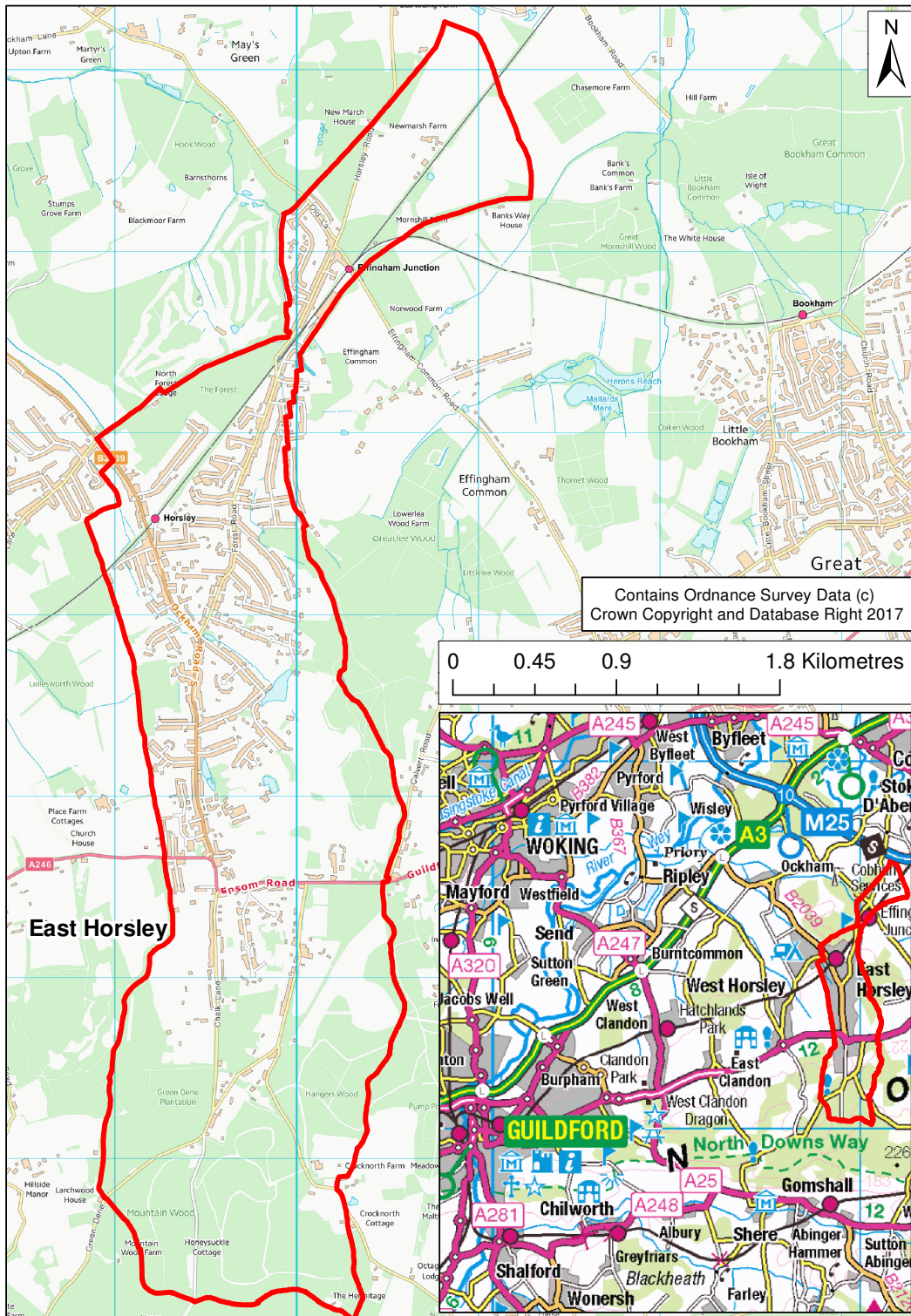


Figure 1-1: East Horsley Neighbourhood Area



The primary aims of this Screening Report are to:

1. identify whether the East Horsley Neighbourhood Plan requires a Strategic Environmental Assessment (SEA) by appraising the potential high-level environmental impacts that may arise from the Neighbourhood Plan and concluding whether there is a need to conduct a full SEA.
2. identify, describe and assess the likely significant effects of implementing the Plan on European designated sites (i.e. Special Areas of Conservation (SACs) and Special Protection Areas (SPAs)) and also Ramsar sites) within and around the neighbourhood area of East Horsley as part of a Habitats Regulations Assessment (HRA).

The above two aims of this Screening Report are closely interlinked, with the HRA providing supporting evidence for the conclusions reached within the SEA. For clarity and ease of reference this report contains the assessments and conclusions required for both the SEA and the HRA.

Given that the HRA feeds into the conclusions of the SEA, the HRA is first provided in Chapter 3, with the SEA detailed in Chapters 4.

## 2 Legislative Regime

### 2.1 Strategic Environmental Assessment

The Environmental Assessment of Plans and Programmes Regulations 2004, or SEA Regulations, transpose European Directive 2001/42/EC (the SEA Directive) into English Law. This Directive and Regulations requires a SEA to be undertaken for certain types of plans or programmes that could have a significant environmental effect.

The Regulations form the basis by which all SEAs are carried out to assess the effects and impacts of certain plans and programmes on the environment. Detailed practical guidance on these Regulations can be found in the Office of the Deputy Prime Minister (ODPM) Government publication, *A Practical Guide to the Strategic Environmental Assessment Directive* (ODPM, 2005). This document has been used as the basis for undertaking this Screening Report, in conjunction with the SEA Regulations.

It is a basic condition of producing a Neighbourhood Plan that EU obligations, as incorporated into UK law, are met; this includes those of the SEA Directive. In some limited circumstances, where a Neighbourhood Plan is likely to have significant environmental effects, it may require a SEA (Planning Practice Guidance, 2015). Draft Neighbourhood Plan proposals should therefore be assessed to determine if they are likely to have significant environmental effects (i.e. through a screening assessment as contained within this report). For example, a Neighbourhood Plan may require an SEA where:

- sites are allocated for development.
- the plan area contains sensitive natural or heritage assets that may be affected by the proposals in the plan.
- the neighbourhood plan may have significant environmental effects that have not already been considered and dealt with through a Sustainability Appraisal of the Local Plan.

If significant environmental impacts are triggered by the implementation of a Neighbourhood Plan, it is considered prudent to advise that a SEA is required. As such, it is important to determine whether there would be significant environmental impacts as per the SEA Directive.

### 2.2 Habitats Regulations Assessment

European Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Flora and Fauna (Habitats Directive) provides legal protection to habitats and species of European importance. The principal aim of this directive is to maintain at, and where necessary restore to, favourable conservation the status of flora, fauna and habitats found at these designated sites (i.e. SACs, SPAs and Ramsar sites). The Directive is transposed into English legislation through the Conservation of Habitats and Species Regulations 2010 (as amended).

It is a requirement of Article 102 of the Conservation of Habitats and Species Regulations 2010 (as amended) that "*the plan-making authority for that plan must, before the plan is given effect, make an **appropriate assessment** of the implications for the site in view of that site's conservation objectives*", where the plan is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and where it is not directly connected with or necessary to the management of the site. Article 102 also requires that "*in the light of the conclusions of the assessment, and subject to regulation 103 (considerations of overriding public interest), the plan-making authority or, in the case of a regional strategy, the Secretary of State must give effect to the land use plan only after having ascertained that it will not adversely affect the integrity of the European site or the European offshore marine site (as the case may be)*".

The HRA process is underpinned by the precautionary principle, especially in the assessment of potential impacts and their resolution. If it is not possible to rule out likely significant effects on the evidence available, then it is assumed that a risk may exist and it needs to be addressed in the assessment process, preferably through changes to the proposed measure or through options such as avoidance or control measures. Only once this assessment has been completed can it be concluded that there is no adverse risk to a European site resulting from the plan.

Spatial planning documents, such as Neighbourhood Plans, are required to undergo HRA if they are not directly connected with, or necessary to, the management of a European site. As the East

Horsley Neighbourhood Plan is not connected with, or necessary to, the management of European designated sites, it is necessary to undertake a HRA.

## 3 Habitats Regulations Assessment Screening

### 3.1 Habitats Regulations Assessment Methodology

Habitat Regulations Assessment follows a three-stage process as outlined in the DCLG guidance "*Planning for the Protection of European Sites: Appropriate Assessment*". These stages are described in Table 3-1.

Table 3-1: The HRA Process

Stage/Task	Description
<b>HRA Task 1 - Screening</b>	<p>This process identifies the likely impacts upon a European site of a project or plan, either alone or in combination with other projects or plans, and determines whether these impacts are likely to be significant.</p> <p>If no adverse impact is determined, the project or plan can proceed. If an adverse impact is identified, Task 2 is commenced.</p>
<b>HRA Task 2 - Appropriate Assessment</b>	<p>Task 2 is subsequent to the identification of likely significant effects upon a European site in Task 1. This assessment determines whether a project or plan would have an adverse impact on the integrity of a European site, either alone or in combination with other projects or plans.</p> <p>This assessment is confined to the effects on the internationally important habitats and species for which the site is designated (i.e. the interest features of the site).</p> <p>If no adverse impact is determined, the project or plan can proceed. If an adverse impact is identified, task 3 is commenced.</p>
<b>HRA Task 3 - Mitigation and Alternatives</b>	<p>Where a plan or project has been found to have adverse impacts on the integrity of a European site, potential avoidance/mitigation measures or alternative options should be identified.</p> <p>If suitable avoidance/mitigation or alternative options are identified, that result in there being no adverse impacts from the project or plan on European sites, the project or plan can proceed.</p> <p>If no suitable avoidance/mitigation or alternative options are identified, as a rule the project or plan should not proceed. However, in exceptional circumstances, if there is an 'imperative reason of overriding public interest' for the implementation of the project or plan, consideration can be given to proceeding in the absence of alternative solutions. In these cases compensatory measures must have to be put in place to offset negative impacts.</p>

#### 3.1.1 HRA Task 1 Screening - Methodology

The following section details the methodology of the screening assessment undertaken to identify the likely impacts of the East Horsley Neighbourhood Plan upon European sites, and to determine whether these impacts are likely to be significant and whether an Appropriate Assessment, and mitigation and assessment of alternatives (HRA Task 2 and 3) are required.

##### Methodology

In order to complete the screening assessment it is necessary to:

- Identify the European sites within and outside the plan area likely to be affected, reasons for their designation and their conservation objectives.
- Describe the plan and its aims and objectives and also those of other projects or plans that in combination have the potential to impact upon the European sites.

- Identify the potential effects on the European sites.
- Assess the significance of these potential effects on the European sites.

### The Precautionary Principle

If there is uncertainty, and it is not possible, based on the information available, to confidently determine that there will be no significant effects on a site then the precautionary principle will be applied, and the plan will be subject to an Appropriate Assessment (HRA Task 2).

### Consultation

It is a requirement of the Habitat Regulations to consult the appropriate nature conservation statutory body. Consultation on the approach to this HRA screening and the information on European sites considered will be undertaken with Natural England as required.

## 3.2 European Sites

European sites are often collectively known as Natura 2000 sites. Natura 2000 is an EU-wide network of nature protection areas established under the Habitats Directive. The aim of the network is to assure the long-term survival of Europe's most valuable and threatened habitats and species.

Natura 2000 consists of:

- **Special Areas of Conservation (SACs)** - these are designated under the UK Regulations made under the Habitats Directive to protect those habitat types and species that are considered to be most in need of conservation at a European level (excluding birds).
- **Special Protection Areas (SPAs)** - these are designated under the UK Regulations under the Birds Directive to protect rare and vulnerable birds, and also regularly occurring migratory species
- **Ramsar sites** - these are wetlands of international importance designated under the Ramsar Convention.

Although not included in the European legislation, as a matter of policy, Ramsar sites in England are protected as European sites. The vast majority are also classified as SPAs and Sites of Special Scientific Interest (SSSIs). All SPAs and terrestrial SACs in England are also designated as SSSIs under the Wildlife and Countryside Act (1981) as amended.

### 3.2.1 European Sites in and around East Horsley Neighbourhood Area

Best practice guidance suggests that sites occurring within a wider area of approximately 10km to 15km from the boundary of the area directly affected by a plan should be identified and assessed as part of the HRA screening process, in addition to those sites located within the plan area. However, it is important to consider the possibility of impacts for any European site which might be affected, whatever their location, given the activities included in the plan and their range of influence. This may extend some distance from the area within the immediate influence of a plan. For the East Horsley Neighbourhood Plan a buffer of 10km has been applied given the relatively small size of the neighbourhood area and it is considered that no pathways, including hydrological connections, exist that would impact upon any European sites beyond this extent.

There are no SACs, SPAs and Ramsar sites located within East Horsley neighbourhood area.

There is one SAC and one SPA located within 10km of East Horsley neighbourhood area, these sites are listed in Table 3-2 and shown on Figure 3-1. Both of these sites are composed of a series of separate areas that form the SAC/ SPA.

Table 3-2: European Sites within and adjacent to East Horsley Neighbourhood Area

Designation	Site	Distance and Direction at Closest Point to Neighbourhood Area
<b>SAC</b>	Mole Gap to Reigate Escarpment	4.7km east
<b>SPA</b>	Thames Basin Heaths	2.1km north-west



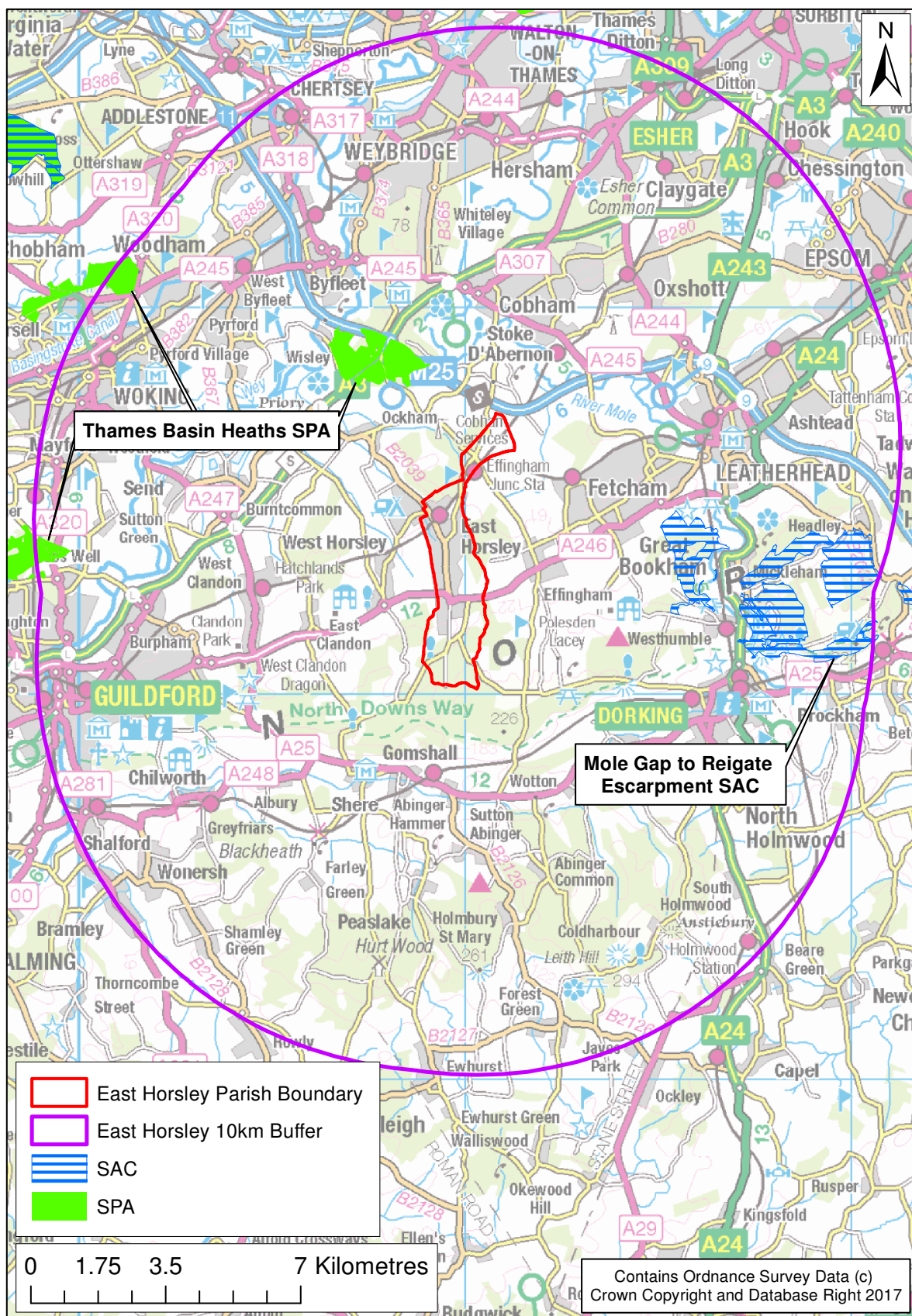


Figure 3-1: Location of European Sites within East Horsley Neighbourhood Area and a 10km Buffer

Table 3-3: Details of European Sites within 10km buffer around East Horsley Neighbourhood Area (Information from JNCC, 2017; Natural England, 2017. 2014a and 2014b)

European Site	Qualifying Feature (Broad Habitat/ Species Groupings)	Qualifying Features	Conservation Objectives	Site Vulnerability
<b>Mole Gap to Reigate Escarpment SAC</b>	Dry woodlands and scrub	Stable xerothermophilous formations with <i>Buxus sempervirens</i> on rock slopes ( <i>Berberidion</i> p.p.) [5110]	<p>To 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:</p> <ul style="list-style-type: none"> <li>- The extent and distribution of qualifying natural habitats and habitats of qualifying species</li> <li>- The structure and function (including typical species) of qualifying natural habitats</li> <li>- The structure and function of the habitats of qualifying species</li> <li>- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely</li> <li>- The populations of qualifying species, and,</li> <li>- The distribution of qualifying species within the site.</li> </ul>	<p>Disease</p> <p>Inappropriate scrub control</p> <p>Change in land management</p> <p>Public access/ disturbance</p> <p>Air pollution: risk of atmospheric nitrogen deposition</p>
	Dry grassland	Semi-natural dry grasslands and scrubland facies on calcareous substrates ( <i>Festuco-Brometalia</i> ) (*important orchid sites) [6210]		
	European dry heaths	<i>Taxus baccata</i> woods of the British Isles *Priority feature [91J0]		
	Amphibia	European dry heaths [4030]		
	Mammals of woodland habitats	<i>Asperulo-Fagetum</i> beech forests [9130]		
		Great crested newt <i>Triturus cristatus</i> [1166]		
	Bechstein's bat <i>Myotis bechsteinii</i> [1323]			
<b>Thames Basin Heaths SPA</b>	Birds of woodland and scrub	During the breeding season the area regularly supports:  Nightjar <i>Caprimulgus europaeus</i> (7.8% of the GB breeding population Count mean (RSPB 1998-99))	<p>To 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:</p> <ul style="list-style-type: none"> <li>- The extent and distribution of the habitats of the qualifying features</li> <li>- The structure and function of the habitats of the qualifying features</li> <li>- The supporting processes on which the habitats of the qualifying features rely</li> <li>- The population of each of the qualifying features, and,</li> </ul>	<p>Public access/ disturbance</p> <p>Undergrazing</p> <p>Forestry and woodland management</p> <p>Hydrological changes</p> <p>Inappropriate scrub control</p> <p>Invasive species</p>
	Birds of lowland heaths and brecks	Woodlark <i>Lullula arborea</i> (9.9% of the GB breeding population Count as at 1997 (Wotton & Gillings 2000))		
		Dartford Warbler <i>Sylvia undata</i> (27.8% of the GB breeding population Count as at		

European Site	Qualifying Feature (Broad Habitat/ Species Groupings)	Qualifying Features	Conservation Objectives	Site Vulnerability
		1999 (RSPB))	- The distribution of the qualifying features within the site.	Wildlife/arson  Air pollution: impact of atmospheric nitrogen deposition  Feature location/ extent/ condition unknown  Military  Habitat fragmentation



### 3.3 Potential Hazards to European Sites

Neighbourhood Plans, with the spatial planning policies they contain, can potentially have adverse impacts on the habitats and species for which European sites are designated. These impacts can be direct such as habitat loss, fragmentation or degradation, or indirect such as disturbance from recreational activities or pollution from construction and transportation.

This section identifies the potential hazards to European sites within the 10km buffer around East Horsley neighbourhood area which may arise as a result of the implementation of the Neighbourhood Plan, and then goes on to identify the types of hazards to which the qualifying features present within the sites are particularly sensitive.

#### 3.3.1 Hazards to Sites

The two European sites within the 10km buffer around East Horsley neighbourhood area mainly consist of dry woodland, grassland and heaths, with considerable bird, amphibian and bat interest. Potential hazards to the interest features are identified in Table 3-4 below.

Table 3-4: Potential Hazards to the European Sites within the 10km Buffer around East Horsley Neighbourhood Area

Potential Hazard	Description
<b>Habitat loss</b>	This is a loss of habitat within the designated boundaries of a European site – there would be no direct loss as a result of the Neighbourhood Plan implementation as both Mole Gap to Reigate Escarpment SAC and Thames Basin Heaths SPA are located outside of East Horsley neighbourhood area.
<b>Habitat fragmentation</b>	This is where activities result in the separation of available habitats or split extensive areas of suitable habitat. This hazard is most likely to affect species by disrupting movement corridors. It can also damage the integrity of European Sites by isolating habitats and the species present from other areas, outwith the site boundaries, that are important for certain aspects of their lifecycle. In relation to the Thames Basin Heaths SPA, Natural England (2015b) identifies that fragmentation of the complex means that recovery after adverse impacts such as fires or severe winters is restricted, potentially preventing species from recolonising and this has led to high risk of local extinctions in parts of the complex.
<b>Changes in physical regime</b>	These are changes to physical process that will alter the present characteristics of the European site e.g. fluvial and geomorphological processes, erosion processes, deposition.
<b>Physical damage</b>	This includes recreational pressures such as trampling and erosion, and where sites are close to urban areas, other damaging activities may occur such as rubbish tipping, vandalism, arson, and predation (particularly by cats).
<b>Habitat/community simplification</b>	Changes to environmental conditions, due to human activities, that result in a reduction and fragmentation of habitats that will reduce biodiversity.
<b>Disturbance (noise, visual)</b>	Activities which result in disturbance, causing sensitive birds and mammals to deviate from their normal, preferred behaviour. These can be caused by construction activities, recreational/amenity use of an area, traffic etc. Natural England (2014b) identify that the Thames Basin Heaths SPA is subject to high levels of recreational use, with dog walkers making up a large proportion of visitors. Similarly, Natural England (2015a) identify increasing population and disturbance impacts as a threat to the Mole Gap to Reigate Escarpment SAC given that Surrey is heavily populated.
<b>Competition from non-native species</b>	Activities may cause the introduction or spread of non-native animals and plants which could result in changes to community composition and even to the complete loss of native communities. Natural England (2014b) identify that the Thames Basin Heaths SPA is at risk from the shrubs Rhododendron and Gaultheria.
<b>Change in water levels or table</b>	Activities which may affect surface and groundwater levels, such as land drainage and abstraction, may have adverse impacts on water dependant habitats and species. Natural England (2015b) identify that in certain parts of the Thames Basin Heaths SPA, drainage impacts are damaging.
<b>Changes in water quality</b>	Activities which may impact upon water quality, such as accidental pollution spills, run-off from urban areas, nutrient enrichment from agriculture, and discharge from sewage works, may adversely affect wetland habitats and

Potential Hazard	Description
	species.
<b>Changes to surface water flooding</b>	Activities may result in a reduction or increase in the frequency and extent of surface water flooding which may affect riverine and floodplain habitats.
<b>Turbidity and siltation</b>	Increases in turbidity within water environments can impact upon aquatic plants, fish and wildfowl due to sedimentation and reduction in penetrable light.
<b>Pollution</b>	Activities may lead to the release of pollutants to the air such as oxides of nitrogen, oxides of sulphur or ammonia, or pollutants deposited on the ground through acidification or terrestrial eutrophication via soil (deposition of nitrogen). Natural England (2014a and 2014b) identify that for both Mole Gap to Reigate Escarpment SAC and Thames Basin SPA nitrogen deposition exceeds the site-relevant critical load for ecosystem protection, potentially resulting in harmful effects.

### 3.3.2 Qualifying Features and Sensitivity to Hazards

Table 3-5 below, shows the qualifying features of the European sites within the 10km buffer around East Horsley neighbourhood area and identifies the hazards to which they are potentially sensitive (see Table 3-3).

It must be noted that during the assessment of the potential impacts of the Neighbourhood Plan on a European site, all of the potential hazards will be considered.

Table 3-5: Sensitivity of European Sites to Potential Hazards

	Potential Hazards											
	Habitat loss	Habitat fragmentation	Changes in physical regime	Physical damage	Habitat/ community simplification	Disturbance (noise, visual)	Competition from non-native species	Change in water levels or table	Changes in water quality	Changes to surface water flooding	Turbidity and siltation	Pollution
<b>Mole Gap to Reigate Escarpment SAC</b>												
Dry woodlands and scrub	✓		✓	✓	✓	✓	✓					✓
Dry grassland	✓		✓	✓	✓	✓	✓					✓
European dry heaths	✓		✓	✓	✓	✓	✓					✓
Amphibia	✓	✓		✓	✓	✓	✓	✓	✓	✓	✓	✓
Mammals of woodland habitats	✓	✓		✓	✓	✓						✓
<b>Thames Basin Heaths SPA</b>												
Birds of woodland and scrub	✓	✓		✓	✓	✓	✓					
Birds of lowland heaths and brecks	✓	✓		✓	✓	✓	✓					

### 3.4 Description of the Neighbourhood Plan Strategies

This section provides a summary of the draft East Horsley Neighbourhood Plan (December 2016 version). The draft plan contains a number specific objectives within four broad areas, as detailed

in Table 3-6 below. Beneath each of these specific objectives are a number of more detailed policies outlining how East Horsley neighbourhood area will develop during the lifetime of the plan.

Table 3-6: Specific Objectives of the East Horsley Neighbourhood Plan

Area	Objective	
<b>Environment</b>	1.1	To protect and enhance the green environment of East Horsley
	1.2	To protect mature trees and hedgerows of arboreal significance
	1.3	To protect and encourage biodiversity
	1.4	To minimise flood risk
	1.5	To protect and expand community-driven acquisitions of green spaces
<b>Housing</b>	2.1	To deliver a range and mix of housing that meets the needs of the community
	2.2	To ensure developments are consistent with the established character of the village
	2.3	To preserve the historic heritage of the village
<b>Infrastructure</b>	3.1	To maintain and enhance local infrastructure
	3.2	To maintain and enhance medical facilities
	3.3	To meet the schooling needs of village residents
	3.4	To improve the safety of pedestrians, cyclists, motorists and other road users
	3.5	To improve the availability of village parking
	3.6	To meet the needs of older people and people with disabilities
	3.7	To maintain and enhance leisure facilities
<b>Local Economy</b>	4.1	To enhance local employment and encourage local businesses
	4.2	To sustain the character and diversity of our retail centres
	4.3	To support home-workers

### 3.5 Other Relevant Plans and Policies that might act in-combination

A series of individually modest effects may in combination produce effects that are likely to adversely affect the integrity of one or more European sites. Article 6(3) of the Habitats Directive tries to address this by taking into account the combination of effects from other plans or policies. The Directive does not explicitly define which other plans and policies are within the scope of the combination provision. Guidance in section 4.4.3 of 'Managing Natura 2000 Sites: The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC', published by the European Commission, states:

*'When determining likely significant effects, the combination of other plans or projects should also be considered to take account of cumulative impacts. It would seem appropriate to restrict the combination provision to other plans or projects which have been actually proposed'.*

Table 3-7 below lists the relevant plans and policies that have been identified as having the potential to result in adverse effects on European sites in-combination with the East Horsley Neighbourhood Plan.

Table 3-7: Other Plans and Policies

Plan/Policy	Potential In-combination Effects
<b>National Planning Policy Framework (NPPF)</b>	The NPPF sets out national planning policy to be taken into account by councils when preparing new local plans and taking decisions on planning applications. In relation to conserving and enhancing the natural environment the NPPF states that the planning system should contribute and enhance the natural and local environment through minimising impacts on biodiversity and providing net gains in biodiversity where possible, including by establishing coherent ecological networks that are more resilient to current and future pressures. It

Plan/Policy	Potential In-combination Effects
	<p>also requires local planning authorities to set criteria based policies against which proposals for any developments on, or affecting, protected wildlife will be judged, with distinctions made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status.</p> <p>The presumption in favour of sustainable development, enshrined within the NPPF, does not apply where development requiring appropriate assessment under the Birds or Habitats Directives is being considered, planned or determined.</p>
<p><b>Guildford Local Plan (2003) and New Local Plan</b></p>	<p>The Guildford Local Plan (2003) contains a number of policies relating to housing, infrastructure, cultural heritage, recreation and the environment. Once the East Horsley Neighbourhood Plan has been adopted or 'made' it will form part of the emerging Local Plan for Guildford. Policies within the Guildford Local Plan and East Horsley Neighbourhood Plan are therefore consistent with each other.</p> <p>The Guildford Local Plan (2003) contains a policy (NE1) which relates directly to the protection of European sites; this states that planning permission will not be granted for proposals which are likely to destroy or have an adverse effect directly or indirectly on the nature conservation value of SPAs and SACs.</p> <p>It should be noted that the Local Plan 2003 is going to be replaced by a new Local Plan. This emerging local plan indicates the strategic needs of the wider local area, and the NPPF requires that the ambition of the Neighbourhood Plan is aligned with those needs. Consultation on the Proposed Submission Local Plan: strategy and sites was undertaken in 2016. Until that time, as the Local Plan Strategy and sites progresses through submission, examination and adoption it will gather weight in planning decision-taking, in accordance with National Planning Policy Framework. This 2016 plan contains a policy (P5) specifically related to the Thames Basin Heath SPA that states that permission will not be granted for development proposals unless it can be demonstrated that doing so would not give rise to adverse effects on the ecological integrity of the Thames Basin Heaths SPA, whether alone or in combination with other development (GBC, 2016b).</p>
<p><b>Thames Basin Heaths Special Protection Area: Avoidance Strategy 2009 - 2016</b></p>	<p>Natural England has recognised that residential development across the South East region could potentially adversely impact on the Thames Basin Heaths SPA through increased recreational use creating disturbance impacts. GBC, along with all other councils where development has the potential to impact upon the SPA, have therefore developed avoidance strategies, in conjunction with Natural England, to identify where adverse impacts may arise and the avoidance and/or mitigation measures required. This avoidance strategy should prevent a situation arising where Local Authorities will not be able to grant planning permission for further residential development within 5km of these designated heathlands (the area identified as the Zone of Influence for cumulative impacts). This strategy therefore provides an assessment framework to identify where policies of the East Horsley Neighbourhood Plan may result in adverse impacts on the SPA and this is taken into account throughout this HRA.</p> <p>This strategy is dated from 2009-2016, and a new supplementary planning document, which will replace the avoidance strategy, is currently being drafted, however, this has yet to be finalised and endorsed by Natural England and therefore this Avoidance Strategy is that which is considered current.</p>
<p><b>The South East Plan - Regional Spatial Strategy for the South East 2009 - Policy NRM6</b></p>	<p>Although the Regional Spatial Strategy for the South East has now been partially revoked under the 2013 Localism Bill, policy NRM6 relating to the Thames Basin Heaths SPA was retained and remains a material consideration as part of development planning in Guildford (GBC, 2016b). This policy is linked to the Thames Basin Heaths SPA Avoidance Strategy detailed above and relates to new residential development which is likely to have a significant effect on the ecological integrity of the SPA.</p> <p>Policy NRM6 states that any development which may impact upon the SPA is required to demonstrate that adequate measures are put in place to avoid or mitigate any potential adverse effects, and these measures must be agreed with</p>

Plan/Policy	Potential In-combination Effects
	<p>Natural England.</p> <p>Policy NRM6 advocates directing development to areas where potential adverse effects can be avoided without the need for mitigation. However, where mitigation measures are required three principles are set out, including:</p> <ol style="list-style-type: none"> <li>1. A zone of influence set at a 5km linear distance from the SPA boundary is established where measures must be taken to ensure that the integrity of the SPA is protected.</li> <li>2. Within this zone of influence there will be a 400m 'exclusion zone' where mitigation measures are unlikely to be capable of protecting the integrity of the SPA. In exceptional circumstances, this may vary with the provision of evidence to demonstrate that the integrity of the SPA will be protected. These locally determined zones will be set out in local development frameworks and agreed with Natural England.</li> <li>3. Where development is proposed outside the exclusion zone, but within the zone of influence, mitigation measures will be delivered prior to occupation and in perpetuity. Measures will be based on a combination of access management, and the provision of Suitable Accessible Natural Greenspace (SANG).</li> </ol> <p>Policy NRM6 also details the requirements of SANG provision, namely;</p> <ol style="list-style-type: none"> <li>1. A minimum of eight hectares of SANG land (after discounting to account for current access and capacity) should be provided per 1,000 new occupants.</li> <li>2. Developments of fewer than 10 dwellings should not be required to be within a specified distance of SANG land provided it is ensured that a sufficient quantity of SANG land is in place to cater for the consequent increase in residents prior to occupation of the dwellings.</li> <li>3. Access management measures will be provided strategically to ensure that adverse impacts on the SPA are avoided and that SANG functions effectively.</li> <li>4. Authorities should co-operate and work jointly to implement mitigation measures. These include, inter alia, assistance to those authorities with insufficient SANG land within their own boundaries, co-operation on access management and joint development plan documents.</li> <li>5. Relevant parties will co-operate with Natural England and landowners and stakeholders in monitoring the effectiveness of avoidance and mitigation measures and monitoring visitor pressure on the SPA and review/ amend the approach set out in this policy, as necessary.</li> <li>6. Local authorities will collect developer contributions towards mitigation measures, including the provision of SANG land and joint contributions to the funding of access management and monitoring the effects of mitigation measures across the SPA.</li> <li>7. Large developments may be expected to provide bespoke mitigation that provides a combination of benefits including SANG, biodiversity enhancement, green infrastructure and, potentially, new recreational facilities.</li> </ol> <p>Where further evidence demonstrates that the integrity of the SPA can be protected using different linear thresholds or with alternative mitigation measures (including standards of SANG provision different to those set out in this policy) these must be agreed with Natural England.</p> <p>This policy provides a framework for the protection of the Thames Basin Heaths SPA and will therefore help to prevent adverse in-combination effects with other plans, policies and programmes implemented in the region. The East Horsley Neighbourhood Plan will have to ensure that its policies are consistent with the requirements of policy NRM6.</p>

### 3.6 Screening Assessment

This section considers the objectives identified in the Preferred Draft East Horsley Neighbourhood Plan that are considered to have an impact on European Sites and identifies whether or not they are likely to have significant effects on site integrity, either alone or in-combination with other plans and/or projects, as detailed in Table 3-7.

Taking into account the location of the European sites in relation to East Horsley neighbourhood area and the identified potential hazards associated with the objectives of the Neighbourhood Plan, an assessment has been made as to whether the Neighbourhood Plan, alone and in-combination with other plans and/or projects, will have likely significant effects on any European sites. This assessment is detailed in Table 3-8. Full wording of the policies and proposals can be found within the Preferred Draft East Horsley Neighbourhood Plan.

Table 3-8: Assessment of East Horsley Neighbourhood Plan Objectives and Policies on European Sites

Policies and Proposals		Policy Summary	Assessment of likelihood of significant effects	Significant effects
<b>Spatial Development Plan</b>	EH-S1: Spatial Development Plan for East Horsley	This policy determines where new development will be focussed within the Neighbourhood Plan area, based on the applicable settlement boundary as detailed in the GBC Local Plan. Dependent on the location of the development in relation to the applicable settlement area other policies and assessments, such as the Green Belt Policy, Guildford Landscape Character Assessment and the Surrey Hills AONB Management Plan, will also need to be taken into account.	This policy has an over-arching remit that governs where development will be undertaken within the Neighbourhood Plan area. However, the landscape and planning context for new development under this policy is governed by other policies within the East Horsley Neighbourhood Plan, such as EH-H3 to EH-H7, EH-EN1, EH-INF4, EH-LE2 and EHLE3. Given that the rows below assess the potential impacts of these individual policies, the conclusions that apply to those policies can also be considered applicable to this over-arching policy and the same conclusion can apply.	None (see policies below)
<b>Environment</b>	EH-EN1: Local Green Spaces	This policy designates seven areas (Clamp Rough & Gallows Grove; Kingston Meadow; Pennymead Sports Ground; Ridings Wood; Sheepleas; The Forest; and Wellington Meadow) as Local Green Spaces. The development of these areas will not be permitted unless it is clearly demonstrated that it is required to enhance the role and function for which the space has been designated.	As this policy designates a number of areas as green spaces which are protected from development it will not result in any adverse impacts on Mole Gap to Reigate Escarpment SAC and Thames Basin Heaths SPA.	None
	EH-EN2: Trees & Hedgerows	This policy supports development proposals that retains mature trees of arboreal significance and established hedgerows. Development which results in the loss or damage to mature trees/hedgerows will be expected to undertake replacement planting. Developments on greenfield sites should include appropriate landscaping to ensure the 'leafy' character of East Horsley is sustained.	As this policy helps to ensure the protection of mature trees and hedgerows it will not result in any adverse impacts on Mole Gap to Reigate Escarpment SAC and Thames Basin Heaths SPA. Retention of hedgerows and mature trees will also help to maintain habitat connectivity between the neighbourhood area and the designated sites.	None
	EH-EN3: Landscape Features	This policy requires development proposals to demonstrate they will not have a material adverse impact on landscape features of visual merit or historic significance (e.g. chalk banks found in Chalk Lane; historic embankments in The Forest and	This policy is concerned with the ensuring that development proposals do not impact on features of landscape and heritage importance within the neighbourhood area, and it will not therefore impact on the SAC and SPA.	None



Policies and Proposals	Policy Summary	Assessment of likelihood of significant effects	Significant effects
	Great Ridings Wood; Pennymead Lake, the Pond, House Pond and Dick Focks' Pond; stone or brick boundary walls built prior to 1920 and any bridges of the Lovelace Bridges Trail; and scheduled monuments identified in the Surrey Historic Environment Record).		
	EH-EN4: Biodiversity This policy will support developments that have no material adverse effects on existing biodiversity. Wherever possible developments should seek to enhance biodiversity (e.g. through maintaining hedgerows, planting new hedgerows of native species).	Given this policy is concerned with protecting and enhancing biodiversity within the neighbourhood area it will not result in any adverse impacts on Mole Gap to Reigate Escarpment SAC and Thames Basin Heaths SPA.	None
	EH-EN5: Flooding This policy requires development proposals which include, or are in close proximity to, drainage gullies, ditches, culverts, pipes or other systems provided for surface water drainage to include a condition survey of such drainage systems with the planning application. Development proposals in such locations are required to ensure that existing drainage systems are not worsened and ideally improved as a result of the proposed development. They must also ensure there is no increase in surface water flooding as a consequence of the development.	This policy is to ensure that development does not increase flood risk or damage to drainage systems within East Horsley neighbourhood area and, where possible, reduces overall flood risk. It will therefore not impact on the SAC and SPA.	None
<b>Housing</b>	EH-H1: Housing Mix This policy stipulates that developments of 20 or more dwellings shall provide a mix of housing types (market and affordable), including 25-35% family homes, 30-40% homes for downsizers, 15-25% homes for first time buyers and 10-20% housing for the elderly.	As these policies are concerned with the specific details of proposed developments, in terms of their structure and housing mix and not where development will be situated, they will not impact on the SAC and SPA.	None
	EH-H2: Bungalows This policy requires that on developments of more than 20 dwellings, at least 10% are built as bungalows.		None



Policies and Proposals		Policy Summary	Assessment of likelihood of significant effects	Significant effects
	EH-H3: Countryside Deport	<p>This policy states that planning permission will be granted for development of 0.075 hectares of land, assuming that:</p> <ul style="list-style-type: none"> <li>a. it is for the provision of up to 5 homes; and</li> <li>b. these homes should be designed to be suitable for the elderly (1 and 2 beds) or for downsizers (2 and 3 beds); and</li> <li>c. the development design should not affect the neighbouring amenity nor have a detrimental impact on the adjacent Conservation Area street scene; and</li> <li>d. all parking requirements for residents and visitors must be contained within the curtilage of the site.</li> </ul>	<p>Policies EH-H3 to EH-H6 are all concerned with the provision of new homes within the neighbourhood area; specifically, the provision of approximately 47 new homes at four development sites over the life of the plan (see Appendix A for the location of these). Whilst the allocated development sites are outside the boundaries of the SAC and SPA (5.2km distant at the closest point), and therefore unlikely to have direct impacts, indirect adverse impacts could arise such as increased recreational pressure and disturbance, or increased air pollution from more traffic.</p> <p>Specifically, in relation to the Thames Basin Heaths SPA, Natural England consider that the cumulative effect of further residential development within 400m of the SPA boundary will have a significant effect. There will therefore be a presumption against additional net new dwellings with 400m (the exclusion zone); this does not impact on the East Horsley Neighbourhood Plan as the neighbourhood area boundary is 2.2km south-east of one of the sites designated as part of the Thames Basin Heaths SPA (i.e. the Ockham and Wisley Commons SSSI), with the closest allocated development site 5.2km south.</p>	None
	EH-H4: BT Telephone Exchange	<p>This policy states that planning permission will be granted for development of 0.22 hectares of land, assuming that:</p> <ul style="list-style-type: none"> <li>a. it is for the provision of up to 10 homes; and</li> <li>b. these homes should be designed to be suitable for downsizers (2 and 3 beds) and also for the elderly (1 and 2 beds) in roughly equal proportions; and</li> <li>c. the development design should not affect the neighbouring amenity nor have a detrimental impact on the adjacent Conservation Area street scene; and</li> <li>d. all parking requirements for residents and visitors must be contained within the curtilage of the site.</li> </ul>	<p>Within a Zone of Influence 400m to 5km from the SPA boundary Natural England consider that residential development could also have a significant adverse effect on the heaths and the bird populations they support (GBC, 2015). Avoidance and/or mitigation measures are therefore required to avoid a situation where local authorities will not be able to grant planning permission for further residential development within 5km of the SPA boundary. Policies EH-H3 to EH-H6 all allocate land for residential development in areas more than 5km from the SPA boundary and therefore no impact is anticipated and further mitigation requirements</p>	None

Policies and Proposals	Policy Summary	Assessment of likelihood of significant effects	Significant effects
		<p>The policy also states that planning permission will be granted for development of flexible offices up to 250 m<sup>2</sup> in total floor space, and include appropriate parking provision within the curtilage with sympathetic building design.</p>	<p>as detailed in the Thames Basin Heaths Avoidance Strategy (GBC, 2015) will not be required.</p>
EH-H5: Carlans Garage Site	<p>This policy states that planning permission will be granted for development of 0.16 hectare, assuming that:</p> <ul style="list-style-type: none"> <li>a. it is for the provision of up to 10 homes; and</li> <li>b. the majority of these homes should be designed to be suitable for first time buyers (1 and 2 beds); and</li> <li>c. the development should not affect the amenity of adjacent properties, in particular the houses of Rosewood and Chapel Port in Fearn Close and Limegrove Care Home in St Martin's Close, nor have a detrimental impact on the nearby street scene; and</li> <li>d. all parking requirements for residents and visitors must be contained within the curtilage of the site, including sufficient space for temporary stopping by delivery trucks, refuse vehicles etc. without them blocking the busy A246.</li> </ul>	<p>As Policies EH-H3 to EH-H6, allocate land for development within the 5 - 7km area beyond the Zone of Influence, applications for large scale developments are assessed on a case-by-case basis. Given that policies EH-H3 to EH-H6 are for 22 homes at maximum it is not considered that they represent large scale developments (considered to be of at least 50 net new dwellings; GBC, 2016c) and therefore no significant impact on the SPA is anticipated and these policies are considered compliant with the SPA Avoidance Strategy.</p> <p>There is no specific strategy for Mole Gap to Reigate Escarpment SAC, however, the Site Improvement Plan (Natural England, 2015a) does identify that this area of Surrey is heavily populated and that increased visitor pressure can become damaging to the protected sites and disturb the species they support. However, this plan identifies a number of on-site measures to help minimise disturbance impacts from increasing population density in the area (e.g. securing existing hibernacula and ponds, and building new ponds) and the policies of the Neighbourhood Plan will not prevent implementation of these. In addition, the Mole Valley Local Development Framework Mole Gap to Reigate Escarpment SAC Guidance Note (Mole Valley District</p>	None

Policies and Proposals	Policy Summary	Assessment of likelihood of significant effects	Significant effects
EH-H6: Thatcher's Hotel Site	<p>This policy states that planning permission will be granted for development of 0.74 hectares of land, assuming that:</p> <ul style="list-style-type: none"> <li>a. it is for the provision of approximately 22 homes (market and affordable), to be located within the existing settlement area; and</li> <li>b. compliance with the housing mix ranges as proposed in Policy EH-H1, which mix ranges shall apply even if the development is proposed for less than 20 dwellings; and</li> <li>c. The original front building, which is of Chown design, should be retained if at all possible and converted into apartments or other housing; and</li> <li>d. mature tree screening from the A246 should be maintained; and</li> <li>e. the Lovelace boundary wall on the southern and western boundaries adjacent to the A246 is a distinctive landmark feature and should be maintained; and</li> <li>f. a publicly-accessible footpath is provided allowing passage through or around the site for beside the petrol filling station to the pavement of the A246 Guildford Road to the entrance of The Warren; and</li> <li>g. The loss of the hotel facility must be appropriately justified in the planning application in accordance with the applicable local plan.</li> </ul>	<p>Council, 2012) safeguards a buffer zone, extending 800m beyond the boundary of the SAC, within which there is a presumption against any increase in residential or employment related development unless its impact can be mitigated. As East Horsley neighbourhood area is 4.7km from the SAC boundary it is compliant with this strategy to avoid impacts. Consequently, no adverse effects on this SAC from implementation of this Neighbourhood Plan policy is anticipated.</p> <p>Furthermore, the East Horsley Neighbourhood Plan contains a number of policies to create new green spaces and recreational assets within the neighbourhood area, and maintain those already present (e.g. EH-EN1 which designates and protects seven local green spaces in the neighbourhood area, EH-INF4 which makes provisions for publicly accessible footpaths and cycleways and EH-INF5 which proposes to establish new leisure facilities, or expand/ improve existing facilities). This will create alternative assets to reduce pressures on the SAC and SPA thereby minimising any indirect adverse impacts from increased recreational pressures.</p>	None
EH-H7(a) East Horsley Design Code: Houses and Bungalows	These policies set design principles for houses, bungalows and apartments that will ensure the designs are in keeping with the established character of East Horsley and the style of surrounding developments. They establish a design	As these policies are concerned with the specific details of proposed developments, in terms of design and potential impacts on the landscape, heritage and rural character of the neighbourhood area, they will not therefore impact on the SAC and SPA.	None
EH-H7(b) East			None

Policies and Proposals		Policy Summary	Assessment of likelihood of significant effects	Significant effects
	Horsley Design Code: Apartments	code covering aspects including landscaping, refuse and recycling provision, ridge heights, boundary clearances and off-street parking.		
	EH-H7(c) East Horsley Design Code: New Roads	This policy relates to the design of roads within new developments and provides a number of recommendations, including preferring cul-de-sac layout; including provision for footpath of cycleway linkages wherever possible; using hedges or scrubs for screening rather than fences, walls or railings; using grass verges rather than tarmac; and providing community-owned green areas and trees to enhance the overall landscaping.	Whilst this policy is concerned with new development, it does not make provision for allocation of land, only the style and design of roads within areas of new development. Previously discussed policies EN-H3 to EH-H6 provide the details of the land allocations. Consequently, as this policy is only concerned with design principles it will not adversely impact on the SAC and SPA.	None
	EH-H8: Residential Re-builds	This policy supports re-building on a site within the applicable settlement area containing one or more existing homes, providing the resultant Plot Ratio is in keeping with the average Plot Ratio of dwellings in the vicinity of the site.	Policies EH-H6 and EH-H9 are concerned with very small-scale new developments within existing plots (i.e. infilling), or re-builds, on land outside that allocated for development as part of policies EH-H3 - EH-H6. However, the extent and location of the re-build and in-fill development is currently unknown. Given that East Horsley neighbourhood area falls 2.2km south-east of the Thames Basin Heaths SPA and 4.7km west of the Mole Gap to Reigate Escarpment SAC there will be no direct impact upon these sites from these policies, however, indirect impacts may occur.	None
	EH-H9: Residential Infilling	This policy supports residential infilling within the applicable settlement area assuming that it will have no material impact on the neighbouring amenity; the site is substantially surrounding by existing development; and the resultant Plot Ratio of the new development is in keeping with the average Plot Ratio of dwellings in the vicinity of the site.	Specifically, in relation to the SPA the neighbourhood area is outside the 400m exclusion zone where there is a presumption against additional net new dwellings due to the pressure of increased recreational use. However, the northern part of the neighbourhood area does fall within the 5km Zone of Influence and as discussed in Table 3-7, avoidance measures within the 5km Zone of Influence include the provision of SANG. However, GBC (2015) detail in their Avoidance Strategy that developments of less than 10 dwellings within 5km of the SPA do not need to be within a specified distance of SANG provided that a sufficient quantity and quality of SANG land to cater for the consequent increase in	None

Policies and Proposals		Policy Summary	Assessment of likelihood of significant effects	Significant effects
			<p>population is identified and available in the borough and functional in advance of completion. Given that GBC (2015) identifies five SANG sites which have been approved by Natural England, along with another two potential sites, it is considered there is sufficient SANG available within Guildford Borough to avoid impacts on the SPA from these small-scale developments.</p> <p>Furthermore, the East Horsley Neighbourhood Plan contains a number of policies to create new green spaces and recreational assets within the neighbourhood area, and maintain those already present (e.g. EH-EN1 which designates and protects seven local green spaces in the neighbourhood area, EH-INF4 which makes provisions for publicly accessible footpaths and cycleways and EH-INF5 which proposes to establish new leisure facilities, or expand/ improve existing facilities). This will create alternative assets to reduce pressures on the SPA, and also the SAC, thereby minimising any indirect adverse impacts from increased recreational pressures.</p> <p>Beyond this, these infill/ re-build developments within the 5 - 7km area from the SPA would not require consideration with regards to the impact on the heaths, or avoidance measures, as developments under this policy would be very small-scale.</p> <p>As discussed above, there is no strategy for Mole Gap to Reigate Escarpment SAC, however, the Site Improvement Plan (Natural England, 2015a) does identify that this area of Surrey is heavily populated and that increased visitor pressure can become damaging to the protected sites and disturb the species they support. However, this plan identifies a number of on-site measures to help minimise disturbance impacts from increasing population density in the area (e.g. securing</p>	

Policies and Proposals	Policy Summary	Policy Summary	Assessment of likelihood of significant effects	Significant effects
			existing hibernacula and ponds, and building new ponds) and the policies of the Neighbourhood Plan will not prevent implementation of these. In addition, the Mole Valley Local Development Framework Mole Gap to Reigate Escarpment SAC Guidance Note (Mole Valley District Council, 2012) safeguards a buffer zone, extending 800m beyond the boundary of the SAC, within which there is a presumption against any increase in residential or employment related development unless its impact can be mitigated. As East Horsley neighbourhood area is 4.7km from the SAC boundary it is compliant with this strategy to avoid impacts. Consequently, no adverse effects on this SAC from implementation of this Neighbourhood Plan policy is anticipated.	
	EH-H10: Heritage Assets	This policy stipulates that proposals for the development of buildings which have been granted a 'local listing' by GBC will be assessed taking into account the scale of any harm or loss and the significance of the building concerned in terms of its historic value or architectural merit. Furthermore, proposals for the development of other non-listed buildings of historic significance or of special character will be assessed taking into account the scale of any harm or loss, the significance of the building concerned and any public benefit arising from the proposed development.	This policy is concerned with the specific details of proposed development, in terms of its impact on heritage and architectural features, and will not therefore impact on the SAC and SPA.	None
<b>Infrastructure</b>	EH-INF1: East Horsley Medical Centre	This policy supports proposals for the extension of existing medical facilities at East Horsley Medical Centre and will ensure that appropriate levels of patient and staff parking are provided.	Given that this policy relates to extension of an existing building to provide health services for the neighbourhood area it will not adversely impact on the SAC and SPA.	None
	EH-INF2: Care Facilities	This policy supports proposals for the extension of existing care facilities at two sites (Limegrove Care Home and St Martin's Court).	Given that this policy relates to extension of existing buildings to provide care facilities for the neighbourhood area it will not adversely impact on the SAC and SPA.	None
	EH-INF3: Parking Improvements	This policy supports additional and/ or enhanced provision of car parking spaces at a number of	Given that this policy focuses on provision/improvement of car parking facilities within East Horsley	None



Policies and Proposals		Policy Summary	Assessment of likelihood of significant effects	Significant effects
<b>Local Economy</b>	EH-LE1: Retail Centres	<p>This policy supports 'change of use' applications at existing retail (Class A) and service units (within classes A2, A3, A4 and A5) at Station Parade, Bishopmead Parade or at Effingham Junction where it provides additional diversity to the range of shops currently in the locality; it offers a positive contribution for the benefit of the local community (e.g. by reducing the need for car trips): and it will result in new A1 retail provision. Change of use to other use classes A1 to A5 or D1 or D2 will be supported.</p> <p>Applicants seeking to change of use from A1 retail to other uses, business offices or betting shops must demonstrate that they have exhausted all reasonable efforts to maintain continued retail use as a condition for the change of use being granted.</p> <p>This policy also supports proposals to allow the temporary, appropriate use of empty retail spaces for up to two years, provided it is appropriate for the location.</p>	This policy will not directly impact upon the SAC and SPA which are located 4.7km and 2.2km from the boundary of East Horsley neighbourhood area respectively as it focuses on existing retail developments and the use of these.	None
	EH-LE2: Small-scale Offices & Workshops	This policy supports the development of small-scale offices and workshops providing they are in keeping with the existing character of the village, scale and context of the immediate surroundings; there is no detrimental impact on the amenity of local residents; and the noise and traffic impacts on the surrounding area are not material.		None
	EH-LE3: Horsley Station Public Transport Interchange	This policy supports development proposals, within 500m of Horsley railway station and within the applicable settlement area, that deliver small-scale office and/or research and development (Classes B1a and B1b) floorspace suitable for start-ups and Small and Medium Enterprises as part of mixed use proposals. These proposals must meet the	Given that these policies focus on areas within the neighbourhood area itself they will not directly impact upon the SAC and SPA which are located 4.7km and 2.2km from the boundary of East Horsley neighbourhood area respectively. The development of small-scale businesses and workshops, and the re-development/'change of use' of Newmarsh Farm or	None



Policies and Proposals		Policy Summary	Assessment of likelihood of significant effects	Significant effects
		requirements of EH-LE2 and be no larger than 350m <sup>2</sup> . Single alternative uses will only be permitted where a mix of uses is not feasible or viable.	other sites is unlikely to be associated with significant increases in population in the area.	
	EH-LE4: Newmarsh Farm	This policy supports proposals for the re-development/ 'change of use' of existing facilities at Newmarsh Farm and for their utilisation as small-scale commercial businesses within the planning constraints of the Metropolitan Green Belt. Support is conditional on the relevant proposals being fully consistent with Green Belt policies and also providing material betterment by way of significant improvements to the current screening appearance of the site.	Although this policy encourages local economic development, it is not likely to result in significant increases in residential populations within East Horsley neighbourhood area, which is restricted by the housing policies EH-H3 - EH-H6. Consequently, this policy will not impact upon the SAC and SPA.	None

### 3.7 Habitats Regulations Assessment Statement and Conclusions

This Screening Assessment has examined the East Horsley Neighbourhood Plan policies for any impacts on the European sites within the neighbourhood area or within 10km of the neighbourhood area. The assessment also took into account in-combination effects with other relevant plans and strategies.

There are no European sites within the East Horsley neighbourhood area, and this Screening Assessment has not identified any adverse impacts on European sites within 10km of the neighbourhood area boundary.

The Plan comprises of a number of policies within five specific areas; spatial development planning, environment, housing, infrastructure and the local economy. Given the scale and nature of the policies within the plan, many of which are consistent with the conservations objectives of the SAC and SPA, no significant adverse impacts have been identified.

All allocated residential development sites within the East Horsley Neighbourhood Plan are more than 5km from the Thames Basin Heaths SPA. Since all sites have a proposed housing number of less than 50, they do not require a Suitable Alternative Natural Greenspace (SANG) as mitigation and small-scale development here is compliant with the SPA Avoidance Strategy (GBC, 2015).

Furthermore, given that East Horsley neighbourhood area is 4.7km from the Mole Gap to Reigate Escarpment SAC, and a number of site management measures are in place to minimise disturbance impacts, no adverse impacts have been identified as a result of plan implementation,

In conclusion, **the East Horsley Neighbourhood Plan will not have an adverse impact on the integrity of any European sites.**

## 4 Strategic Environmental Assessment Screening

### 4.1 SEA Screening Methodology

To complete the SEA screening exercise for the East Horsley Neighbourhood Plan the following stages were applied:

1. The generic requirements of the SEA Directive were applied in accordance with the Assessment criteria specified in *A Practical Guide to the Strategic Environmental Assessment Directive* (ODPM, 2005) (see Figure 4-1), to determine whether a full SEA would be required.
2. The requirements of Article 3(5) of the SEA Directive were applied specifically in relation to the East Horsley Neighbourhood Plan area to determine if the plan could have a significant effect on the environment.

Article 3(5) of the SEA Directive describes and sets out the scope of application of the Directive. It makes SEA mandatory for plans or programmes that are likely to have significant effects on sites designated under the European Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the Habitats Directive). This includes Special Areas of Conservation (SAC) and Special Protection Areas (SPA).

Paragraph 5 of Article 3 of the Directive requires that the full criteria identified in Annex II are taken into account when considering the environmental effects of the Neighbourhood Plan and their significance. These criteria are set out below:

The characteristics of plans or programmes, having regard, in particular, to:

- 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.
- The degree to which the plan or programme influences other plans or programmes, including those in a hierarchy.
- The relevance of the plan or programme for the integration of environmental considerations, in particular with a view to promoting sustainable development.
- Environmental problems relevant to the plan or programme.
- The relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste management or water protection).

The characteristics of the effects and of the area likely to be affected, having regard, in particular to:

- The probability, duration, frequency and reversibility of the effects.
- The cumulative nature of the effects.
- The transboundary nature of the effects.
- The risks to human health or the environment (e.g. due to accidents).
- The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected).
- The value and vulnerability of the area likely to be affected due to:
  - Special natural characteristics or cultural heritage,
  - Exceeded environmental quality standards or limit values,
  - Intensive Land-use,
  - The effects on areas or landscapes which have a recognised National, Community or International protection status

These criteria and characteristics are developed further in the following section and are presented with reason and comment in the context of the East Horsley Neighbourhood Plan.

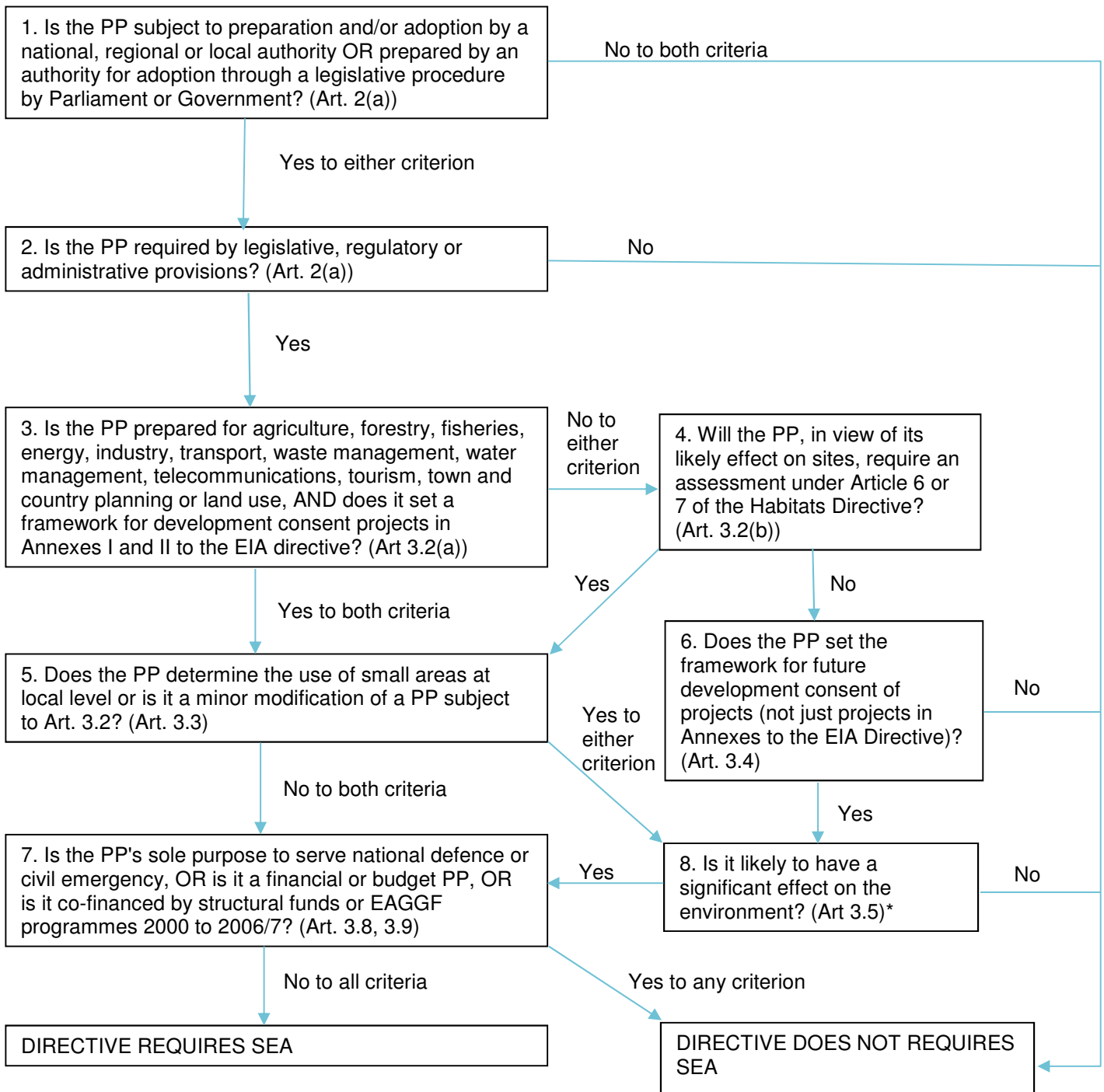
This assessment was undertaken of the Draft of the East Horsley Neighbourhood Plan 2017 - 2033, issued in December 2016.

## 4.2 East Horsley Neighbourhood Plan Screening Assessment

The following section details the application of the SEA Directive to plans and programmes, and illustrates the screening process based on the flowchart presented in *A Practical Guide to the Strategic Environmental Assessment Directives* which is reproduced in Figure 4-1 (ODPM, 2005). Table 4-1 provides responses to these questions as shown in Figure 4-1 and therefore also details the conclusion of the screening process.

Following this, further assessment of the criteria in Article 3(5) of the Directive is undertaken to demonstrate if the East Horsley Neighbourhood Plan will have a significant effect on the environment.

**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.**

Figure 4-1: Application of the SEA Directive to Plans and Programmes (From: A Practical Guide to the Strategic Environmental Assessment Directive; ODPM, 2005)

Table 4-1: SEA Screening Process - Generic requirements of the SEA Directive

Stage and Question	Answer	Explanation
<p><b>1. Is the Plan or Programme (PP) subject to preparation and/or adoption by a national, regional or local authority</b>  <b>OR</b>  <b>prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Art. 2(a))</b></p>	Yes (proceed to Q2)	The Localism Act 2011 allows for the preparation of Neighbourhood Plans. Once it has successfully gone through all the relevant statutory preparation stages a Local Planning Authority has an obligation to adopt or 'make' a Neighbourhood Plan and it then becomes part of the statutory development plan for the relevant Local Authority area. Consequently, Neighbourhood Planning is directed by/ through a legislative procedure.
<p><b>2. Is the PP required by legislative, regulatory or administrative provisions? (Art. 2(a))</b></p>	No (Yes when 'made' so proceed to Q3)	<p>The preparation of Neighbourhood Plans is not mandatory; a Town/ Parish Council or Neighbourhood Forum can choose whether or not to undertake preparation of such a plan. However, if the relevant body decides to prepare a Neighbourhood Plan, that Town/ Parish Council or Neighbourhood Forum is required to follow the set regulatory and administrative procedures.</p> <p>It will also form part of the Development Plan when adopted or 'made' by the Local Planning Authority and it is important to determine whether significant environmental effects are likely and whether further assessment is required.</p>
<p><b>3. Is the PP prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use</b>  <b>AND</b>  <b>does it set a framework for future development consent of projects in Annexes I and II to the Environmental Impact Assessment EIA Directive? (Art. 3.2(a))</b></p>	Yes to both criteria (proceed to Q5)	The East Horsley Neighbourhood Plan sets out a vision for the neighbourhood area and a blueprint for development. Once adopted or 'made' by the Local Planning Authority it will form part of the Local Development Framework and will provide a framework for future development consent and a material consideration in planning decisions. It is therefore prepared for town and country planning and land use, and it does set a framework for future development consent.
<p><b>4. Will the PP, in view of its likely effect on sites, require an assessment under Article 6 or 7 of the Habitats Directive? (Art. 3.2(b))</b></p>	N/A	Not applicable as both criterion to Q3 answered "Yes". However, potential significant impacts on the European sites are addressed further below (see question 8 and Chapter 3).
<p><b>5. Does the PP determine the use of small areas at local level</b>  <b>OR</b>  <b>Is it a minor modification of a PP subject to Art. 3.2? (Art. 3.3)</b></p>	Yes (proceed to Q8)	<p>As discussed above, the East Horsley Neighbourhood Plan aims to establish a clear set of policies and guidelines to support the organic development of East Horsley. Its scope covers:</p> <ul style="list-style-type: none"> <li>- Protection of the environment and minimising flood risk</li> <li>- Housing provision for local people to 2033 and preserving the character and heritage of the village</li> <li>- Community services and infrastructure maintenance and improvement</li> <li>- Enhancing and supporting the local economy</li> </ul> <p>However, this is only in relation to the neighbourhood area of East Horsley, with the majority of policies related to specific, small</p>

Stage and Question	Answer	Explanation
		areas of the village itself; it can therefore be considered as determining the use of small areas at a local level only. However, it is not a minor modification of a plan/project.
<b>6. Does the PP set the framework for future development consent of projects (not just projects in Annexes to the EIA Directive)? (Art 3.4)</b>	N/A	Not applicable as both criterion to Q5 answered "No". However, the Neighbourhood Plan does allocate sites for future housing development within the neighbourhood area of East Horsley. This is not considered to have a significant environmental impact due to the small-scale developments (47 homes over four allocated sites, along with re-build and infill developments) proposed and the inclusion of policies to protect green spaces, village character and the environment.
<b>7. Is the PP'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? (Art. 3.8, 3.9)</b>	N/A	The East Horsley Neighbourhood Plan is not prepared for any of the purposes opposite.
<b>8. Is it likely to have a significant effect on the environment? (Art 3.5)</b>	No (see Table 4-2)	The East Horsley Neighbourhood Plan is unlikely to have any significant effect on the environment. See Table 4-2 below and Chapter 3 which provide further justification of this conclusion.

Following assessment against the generic requirements of the SEA Directive, the specific requirements of Article 3(5) have been considered, as detailed in Table 4-2 .

Table 4-2: SEA Screening Process - Specific Requirements of Article 3(5)

SEA Directive (Annex II)	Explanation	Will the East Horsley Neighbourhood Plan have a significant environmental impact?
<i>Characteristics of the Neighbourhood Plan</i>		
<p><b>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</b></p>	<p>The East Horsley Neighbourhood Plan sets out a vision for the neighbourhood area and a blueprint for development consistent with the needs and expressed opinions of residents, including:</p> <ul style="list-style-type: none"> <li>- Protection of the environment and minimising flood risk</li> <li>- Housing provision for local people to 2033 and preserving the character and heritage of the village (see Appendix A for sites allocated for development)</li> <li>- Community services and infrastructure maintenance and improvement</li> <li>- Enhancing and supporting the local economy</li> </ul> <p>In order to achieve this, a number of policies have been developed within five specific areas: spatial development planning, the environment, housing, infrastructure and the local economy. However, all the policies within the draft Neighbourhood Plan are concerned with relatively small-scale development (i.e. a total of 47 houses at four sites allocated for development as shown in Appendix A, with the largest area supporting 22 dwellings only, in addition to re-build and infill developments) and policies are worded in order to enshrine protection of green space, biodiversity, landscape, community assets and heritage throughout planning policy. Once adopted, the Neighbourhood Plan will form part of the Guildford Local Plan and planning applications within the plan area must be determined in accordance with the Neighbourhood Plan Policies.</p>	No
<p><b>Degree to which the plan or programme influences other plans or programmes including those in a hierarchy</b></p>	<p>The East Horsley Neighbourhood Plan covers a small, defined neighbourhood area within the context of the Guildford Local Plan area. The Neighbourhood Plan will be in general conformity with the strategic policies of the Guildford Local Plan and the National Planning Policy Framework. Once adopted/ 'made' the Neighbourhood Plan will form part of the Development Plan for Guildford borough.</p>	No



SEA Directive (Annex II)	Explanation	Will the East Horsley Neighbourhood Plan have a significant environmental impact?
<p><b>Relevance of the plan or programme for the integration of environmental considerations, in particular with a view to promoting sustainable development.</b></p>	<p>Throughout the plan, integration of environmental considerations is important, with many objectives, and the policies sitting beneath them, concerned with environmental protection and enhancement, thereby promoting sustainable development, for example:</p> <ul style="list-style-type: none"> <li>- protecting local green spaces from development (e.g. policy EH-EN1)</li> <li>- ensuring developments retain mature trees and established hedgerows (policy EH-EN2)</li> <li>- protecting landscape features such as chalk banks, historic embankments, ponds and walls (EH-EN3)</li> <li>- demonstrating that existing biodiversity is conserved and where possible enhanced (policy EH-EN4)</li> <li>- ensuring new developments contain homes suitable for first time buyers, downsizers and the elderly (policies EH-H3 - EH-H6)</li> <li>- ensuring built areas/ new developments follow the East Horsley Design Code to protect existing landscape character (policies EH-H57(a), H7(b) and H7(c))</li> <li>- conserving and enhancing the East Horsley Conservation Area and heritage of the village (policy EH-H10)</li> <li>- supporting improvements to community assets (policies EH-INF1, EH-INF2, EH-INF5)</li> <li>- improving footpaths and cycleways (policy EH-INF4)</li> </ul>	<p>No</p>
<p><b>Environmental problems relevant to the plan or programme</b></p>	<p>Within and around East Horsley neighbourhood area there are a number of sensitive environmental receptors, including:</p> <ul style="list-style-type: none"> <li>- <b>The Thames Basin Heaths SPA and Mole Gap to Reigate Escarpment SAC</b> - see Chapter 3 for a Habitats Regulations Assessment (HRA) screening assessment which fully assesses the potential impacts of each individual objective and policy on the Thames Basin Heaths SPA and Mole Gap to Reigate Escarpment SAC. The HRA concludes that the East Horsley Neighbourhood Plan will not have an adverse impact on the integrity of any European sites, given the scale and nature of the objectives and policies within the Neighbourhood Plan, many of which are consistent with the conservation objectives of the SAC and SPA. Housing development is only proposed on the allocated sites set out in policies EH-H3 to EH-H6, and in a small-scale on infill/re-build developments in policies EH-H8 and EH-H9 and all the sites allocated for housing are compliant with GBC's Thames Basin Heaths Special Protection Area Avoidance Strategy 2009 – 2016 through being a sufficient distance from the site.</li> <li>- <b>Ockham and Wisley Common Site of Special Scientific Interest (SSSI)</b> - this site is a component of the Thames Basin Heaths SPA and is designated for its heath, mire and standing water habitats and invertebrate assemblage, in particular its outstanding Dragonfly assemblage and a number of rare invertebrates (i.e. Hornet Robberfly <i>Asilus crabroniformis</i>, Heath Tiger Beetle <i>Cicindela sylvatica</i> and a fly <i>Thyridanthrax fenestratus</i>). Given that the SSSI is outside of the Neighbourhood Plan area, and located 2.2km from the boundary of it, the same conclusions as reached in relation to the overlapping SPA, as detailed in the HRA at Chapter 3, can also be applied to this SSSI and consequently no adverse impact is</li> </ul>	<p>No</p>

SEA Directive (Annex II)	Explanation	Will the East Horsley Neighbourhood Plan have a significant environmental impact?
	<p>anticipated as a result of the Neighbourhood Plan.</p> <p>- <b>Sheepleas SSSI</b> - Parts of this SSSI fall within the south-western portion of East Horsley neighbourhood area. This SSSI is designated for its lowland calcareous grassland communities, Beech woodland and geological deposits. Whilst this SSSI falls within the neighbourhood area there are no proposals for developments within the site boundary and consequently there will be no direct impact upon it. The closest proposed development site is that at Carlans Garage (policy EH-H5) which is located 55m to the east. However, indirect impacts (e.g. recreational pressures) could arise from increased residential developments promoted by the Neighbourhood Plan. The East Horsley Neighbourhood Plan does however contain a number of policies to create new green spaces and recreational assets within the neighbourhood area (e.g. EH-EN1 which designates seven Local Green spaces, including Sheepleas itself, EH-INF4 which makes provisions for publicly accessible footpaths and cycleways and EH-INF5 which proposes to establish new leisure facilities, or expand/ improve existing facilities), creating alternative assets to reduce pressures on existing sites. Policy EH-EN4 also specifically states that developments that demonstrate no material adverse effects on existing biodiversity shall be supported. Furthermore, Sheepleas SSSI is managed by the Surrey Wildlife Trust for conservation of the semi-natural habitat and landscape, and for the provision of informal public access and recreation (Surrey Wildlife Trust, 2017a). As such, public access to the site is actively and carefully managed and no significant adverse impact from the small number (160) of houses proposed within the East Horsley neighbourhood area is anticipated.</p> <p>- <b>Bookham Commons SSSI</b> - This site is designated for its assemblages of breeding birds and invertebrates, and its grassland, woodland and scrub habitats. It is also understood that this site acts as a Thames Basin Heaths SPA mitigation site, and accepts developer contributions on a case by case basis (Natural England, pers comm). Given that it is located 630m from the neighbourhood area and 4.0km from the nearest development site (EH-H4 BT Telephone Exchange), there will be no direct impacts upon it. However, indirect impacts (e.g. recreational pressures) could arise from increased residential developments promoted by the Neighbourhood Plan. The East Horsley Neighbourhood Plan does however contain a number of policies to create new green spaces and recreational assets within the neighbourhood area (e.g. EH-EN1 which designates seven Local Green spaces, EH-INF4 which makes provisions for publicly accessible footpaths and cycleways and EH-INF5 which proposes to establish new leisure facilities, or expand/ improve existing facilities), creating alternative assets to reduce pressures on existing sites. Furthermore, the SSSI is a National Trust site for which a management plan is already in place and as such no significant adverse impact from the small number (47 plus re-build and infill developments) of houses proposed within the East Horsley neighbourhood area is anticipated.</p> <p>- <b>Upper Common Pits SSSI</b> - This SSSI is designated for its geological interest, with numerous marine fossils occurring in sandy deposits of early Pleistocene age. Given this site is located 570m from the neighbourhood area boundary, and 2.7km from the nearest site allocated for development there will be no</p>	

SEA Directive (Annex II)	Explanation	Will the East Horsley Neighbourhood Plan have a significant environmental impact?
	<p>direct impacts upon it. It is currently assessed as being in favourable condition (Natural England, 2017) and given the nature of the site it is not anticipated that any of the policies within the East Horsley Neighbourhood Plan will have an adverse impact upon it.</p> <p>- <b>Hackhurst and White Downs SSSI</b> - This SSSI is notified for its lowland calcareous grasslands, Yew and Beech woodland types, Hawthorn scrub and the invertebrate assemblage. Given that it is outside of the Neighbourhood Plan boundary, and located more than 3.5km from the nearest site allocated for development, there will be no direct impacts upon it. However, indirect impacts (e.g. recreational pressures) could arise from increased residential developments promoted by the Neighbourhood Plan. The East Horsley Neighbourhood Plan does however contain a number of policies to create new green spaces and recreational assets within the neighbourhood area (e.g. EH-EN1 which designates seven Local Green spaces, EH-INF4 which makes provisions for publicly accessible footpaths and cycleways and EH-INF5 which proposes to establish new leisure facilities, or expand/ improve existing facilities), creating alternative assets to reduce pressures on existing sites. Furthermore, part of this SSSI is managed by the Surrey Wildlife Trust and as such public access to the site is actively and carefully managed and no significant adverse impact from the small number (47 plus re-build and infill developments) of houses proposed within the East Horsley is anticipated.</p> <p>- <b>Ranmore Common SSSI</b> - This site is designated for its woodland habitat types (Beech, Oak-Birch and Ash-Field Maple types), along with its assemblage of breeding birds which use the woodlands. Given that it is outside of the Neighbourhood Plan boundary (2.7km to the east), with the nearest site allocated for development 3.9km away (EH-H6), there will be no direct impacts upon it. However, indirect impacts (e.g. recreational pressures) could arise from increased residential developments promoted by the Neighbourhood Plan. The East Horsley Neighbourhood Plan does however contain a number of policies to create new green spaces and recreational assets within the neighbourhood area (e.g. EH-EN1 which designates seven Local Green spaces, EH-INF4 which makes provisions for publicly accessible footpaths and cycleways and EH-INF5 which proposes to establish new leisure facilities, or expand/ improve existing facilities), creating alternative assets to reduce pressures on existing sites. Furthermore, the SSSI is part of the National Trust managed Polesdon Lacey site for which management is already in place and as such no significant adverse impact from the small number (47 plus re-build and infill developments) of houses proposed within the East Horsley neighbourhood area is anticipated.</p> <p>- <b>Mole Gap to Reigate Escarpment SSSI</b> - this site completely overlaps the Mole Gap to Reigate Escarpment SAC and is designated for similar habitats and species, with additional interest features including the assemblage of breeding birds, lichen flora, the presence of Starfruit <i>Damasonium alisma</i> and the wider vascular plant assemblage, geological features and the invertebrate assemblage. The same conclusions reached in relation the overlapping SAC, as detailed in the HRA in Chapter 3, can also be applied to this SSSI and consequently no adverse impact is anticipated as a result of the Neighbourhood Plan.</p>	

SEA Directive (Annex II)	Explanation	Will the East Horsley Neighbourhood Plan have a significant environmental impact?
	<p>- <b>Surrey Hills Area of Outstanding Natural Beauty (AONB)</b> - the southern part of the neighbourhood area falls within this AONB. However, all areas allocated for residential development in the Neighbourhood Plan (see Appendix A) are located outside of the AONB, the closest being 95m away. In addition, given the location of the development sites, and surrounding properties, it is likely that none of the sites allocated for housing development will be visible from the AONB, and there will be no impact on views to or from the AONB. Furthermore, the Plan contains a number of policies within it that will help conserve the landscape of the AONB, including provision of an East Horsley Design Code (policies EH-H7(a-c)) which detail the requirements for developments to ensure they keep in the established character of the village. Additional policies EH-EN1, EH-EN2, EH-EN3, EH-EN4 and EH-H8 are all concerned with protecting the environment, landscape and heritage of the neighbourhood area which will help protect the AONB.</p> <p>- <b>Sites of Nature Conservation Importance (SNCI)</b> - the neighbourhood area contains three SNCIs; The Forest, Great Ridings Wood and Effingham Forest. The Forest and Great Ridings Wood are provided protection from development as part of Policy EH-EN1 which designates these areas as Local Green Spaces. Effingham Forest, falling within the southern part of the neighbourhood area is outside of the areas allocated for development, and being within the AONB has an additional level of protection. No adverse impacts from the Neighbourhood Plan on these locally designated non-statutory sites is therefore anticipated.</p> <p>- <b>Ancient woodlands</b> - within and around the neighbourhood area of East Horsley there are several areas of ancient woodland which could be adversely affected by development promoted as part of the Neighbourhood Plan. However, no areas proposed for residential development within the plan (see Appendix A) are located within an ancient woodland area. In addition, within the Plan several areas of ancient woodland are designated as Local Green Spaces (e.g. Clamp Rough &amp; Gallows Grove, parts of Ridings Wood, parts of Sheepleas and The Forest) and therefore receive additional protection through planning policy.</p> <p>- <b>East Horsley Conservation Area and numerous listed buildings</b> - whilst development promoted by the Neighbourhood Plan could adversely impact upon East Horsley Conservation Area (e.g. that at EH-H3 and EH-H4 Countryside Depot and BT Telephone Exchange respectively which fall within the Conservation Area boundary) and the 47 listed buildings in the neighbourhood area, policies are contained within the plan to protect these heritage assets and their settings in the landscape, including Policy EH-H10 and policies EH-H7(a-c) which detail a design code to protect the established character of the neighbourhood area.</p> <p>- <b>Rural landscape character</b> - whilst development promoted by the Neighbourhood Plan could adversely impact on rural landscape character, a number of policies are contained within the plan that help to protect the landscape of the neighbourhood area, including those relating to Local Green Spaces (EH-EN1), trees and hedgerows (EH-EN2), landscape features (EH-EN3), design of new developments (EH-H7a-c) and</p>	

SEA Directive (Annex II)	Explanation	Will the East Horsley Neighbourhood Plan have a significant environmental impact?
	<p>heritage assets (EH-H10).</p> <p>At this stage it is considered that the Neighbourhood Plan will not introduce any environmental problems, rather it will seek to encourage sensitive development in relation to the environment through integration of environmental protection measures within a number of the policies of the plan. Consequently, it is not considered that the plan will have significant environmental effects.</p>	
<p><b>Relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste management or water protection)</b></p>	<p>The Neighbourhood Plan does not have policies specifically related to waste management, with the exception of parts of policies EH-H7a-b which contain criteria for new developments to have adequate refuse and recycling storage. Neither does the plan have policies relating to water protection, with the exception of policy EH-EN5 relating to flooding which requires that new developments have adequate surface water drainage systems. Strategies relating to waste disposal or water protection will mostly be dealt with by the Guildford Local Plan and have been integral to development of this Neighbourhood Plan.</p>	<p>No</p>
<p><i>Characteristics of the effects and of the area likely to be affected</i></p>		
<p><b>Probability, duration, frequency and reversibility of the effects</b></p>	<p>Changes that may occur as a result of implementation of the East Horsley Neighbourhood Plan will likely operate over the long-term, but the impacts are expected to be positive by maximising the positive environmental effects and minimising or avoiding negative impacts.</p> <p>The Neighbourhood Plan addresses specific local development management issues, complementing the higher level strategic policy framework already established through the emerging Guildford Local Plan and National Planning Policy Framework.</p>	<p>No</p>
<p><b>Cumulative nature of the effects</b></p>	<p>The development of new residential sites within the East Horsley neighbourhood area along with residential developments elsewhere in the wider area have the potential to cumulatively adversely impact on the Thames Basin Heaths SPA and Mole Gap to Reigate Escarpment SAC, along with a number of SSSIs, through increased visitor pressures. This has been assessed further as part of a Habitats Regulations Screening Assessment (see Chapter 3) and also discussed above. The Habitats Regulations Screening Assessment and text above concludes that, given the wording of the policies and the measures promoted within them, the distance to the SAC/ SPA/ SSSIs, the nature of the development to be permitted, and the management already in place in several of the sites, no adverse impacts on the SAC, SPA or SSSIs would arise, either alone or in-combination with other plans or projects.</p>	<p>No</p>

SEA Directive (Annex II)	Explanation	Will the East Horsley Neighbourhood Plan have a significant environmental impact?
<b>Transboundary nature of the effects</b>	<p>In relation to the potential transboundary impacts from the East Horsley Neighbourhood Plan, it is important to consider other plans and policies in adjacent local authorities and neighbourhoods, in particular the local plans and development frameworks (or emerging plans) from Guildford, Mole Valley and Elmbridge. These have been reviewed and all contain policies within them to help protect sensitive environmental receptors.</p> <p>In relation to the Thames Basin Heaths SPA and Mole Gap to Reigate Escarpment SAC, two of the most notable ecological receptors within the wider area, adverse transboundary effects are not anticipated. As part of the planning policy development process each authority has developed avoidance strategies and guidance notes to help ensure that threats to these sites are not increased as a result of development promoted within the plan. Furthermore, the East Horsley Neighbourhood Plan contains a number of policies to designate Local Green Spaces within the neighbourhood area (e.g. Policy EH-EN1 which designates seven areas in the neighbourhood area as Local Green Spaces), which will create alternative areas to reduce pressures on existing sites thereby minimising any indirect adverse impacts of the proposed residential developments and increased recreational pressures.</p> <p>No significant transboundary effects of the policies contained within the East Horsley Neighbourhood Plan are anticipated given that they focus on small-scale areas within the neighbourhood area itself.</p> <p>Furthermore, Neighbourhood Plans are required to relate to discrete administrative areas. By definition, “transboundary” issues are “strategic” matters; therefore beyond the scope of a Neighbourhood Plan.</p>	No
<b>Risks to human health or the environment (e.g. due to accidents).</b>	<p>No significant risks to human health are anticipated through the implementation of the East Horsley Neighbourhood Plan.</p>	No
<b>Magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)</b>	<p>The Neighbourhood Plan relates to the neighbourhood area of East Horsley only, with a population of 4,290, and proposes to provide an additional 47 homes over the life of the plan at four allocated sites, in addition to re-build and infill developments. Furthermore, the majority of policies within the plan relate to the village of East Horsley itself and are often focussed on existing buildings and formerly developed areas. Consequently, the magnitude and spatial extent of the Neighbourhood Plan is limited and will not have significant environmental effects.</p>	No
<b>Value and vulnerability of the area likely to be affected due to:</b> <b>- Special natural</b>	<p>As discussed above East Horsley neighbourhood area contains, or is located in close proximity to, a number of sensitive environmental receptors including:</p> <ul style="list-style-type: none"> <li>- The Thames Basin Heaths SPA and Mole Gap to Reigate Escarpment SAC (see Chapter 3)</li> </ul>	No

SEA Directive (Annex II)	Explanation	Will the East Horsley Neighbourhood Plan have a significant environmental impact?
<p><b>characteristics or cultural heritage</b></p> <p><b>- Exceeded environmental quality standards or limit values</b></p> <p><b>- Intensive Land-use</b></p>	<ul style="list-style-type: none"> <li>- Ockham and Wisley Common SSSI</li> <li>- Sheepleas SSSI</li> <li>- Bookham Common SSSI</li> <li>- Upper Common Pits SSSI</li> <li>- Hackhurst and White Downs SSSI</li> <li>- Ranmore Common SSSI</li> <li>- Mole Gap to Reigate Escarpment SSSI</li> <li>- Surrey Hills AONB</li> <li>- Three SNCIs</li> <li>- Ancient woodlands</li> <li>- East Horsley Conservation Area and numerous listed buildings</li> <li>- Rural landscape character</li> </ul> <p>The policies of the East Horsley Neighbourhood Plan include the protection of green space, biodiversity, landscape, community assets and heritage throughout planning policy. There is the potential for impacts on the environmental quality and heritage of the area. However, due to the location and small-scale nature of the development allocations, this is not considered to be significant.</p>	
<p><b>Effects on areas or landscapes which have a recognised National, Community or International protection status</b></p>	<p>It is not anticipated that the East Horsley Neighbourhood Plan will adversely impact on the Thames Basin Heaths SPA and Mole Gap to Reigate Escarpment SAC (see Chapter 3), the surrounding SSSIs, the Surrey Hills AONB and/or other areas/ landscapes of community importance, as detailed above. Furthermore, the policies include the protection of green space, biodiversity, landscape, community assets and heritage and it is likely that the Neighbourhood Plan will be positive by maximising the positive environmental effects of development and minimising or avoiding negative impacts.</p>	No

### 4.3 SEA Screening Assessment Conclusion

Preparation of a Neighbourhood Plan for East Horsley is being undertaken in accordance with the Neighbourhood Planning Regulations 2012. The plan covers the period 2017 - 2033 and sets out a vision for the neighbourhood area and a blueprint for development consistent with the objectively assessed needs and expressed opinions of residents. Within the plan there are four themes covered with specific objectives, beneath which sit a number of policies relating to the environment, housing, infrastructure and the local economy.

This SEA Screening Report, which also contains a Habitats Regulations Screening Assessment (see Chapter 3), identified whether or not the East Horsley Neighbourhood Plan requires a SEA by assessing the potential high-level environmental impacts that may arise from implementation of the plan.

**In conclusion, it is considered that the East Horsley Neighbourhood Plan does not require a SEA.** This is primarily because the nature, scale and location of the policies within the plan are not likely to adversely impact on any of the sensitive environmental receptors within or around East Horsley neighbourhood area



## 5 Conclusion

### 5.1 Conclusion

The East Horsley Neighbourhood Plan 2017-2033 is being prepared to provide a vision for the development of the neighbourhood area, consistent with the objectively assessed needs and expressed opinions of residents. This report has screened the objectives and policies contained within the Neighbourhood Plan, which cover the four themes of environment, housing, infrastructure and the local economy, in relation to the requirements of the SEA Regulations and the Habitats Regulations. This screening assessment was required to determine if the Neighbourhood Plan, alone and in-combination with others plans and policies, would give rise to any significant environmental effects. It also determined specifically in relation to the Habitats Regulations whether any significant effects on European Sites within the neighbourhood area, or within 10km of the neighbourhood area boundary, would arise from its implementation.

**In conclusion, it is considered that the East Horsley Neighbourhood Plan does not require a SEA or give rise to likely significant effects on European Sites** due to the nature, scale and location of the policies within the plan, It has been concluded that adverse impacts are not likely on any of the sensitive environmental receptors within or around East Horsley neighbourhood area, including the Thames Basin Heaths SPA and Mole Gap to Reigate Escarpment SAC.

### 5.2 Consultation

East Horsley Parish Council/ GBC is required to consult with the three statutory environmental consultees: Historic England, the Environment Agency and Natural England at the screening stage. This report will be issued to the consultation bodies for their review and comment along with the Neighbourhood Plan.

## Appendices

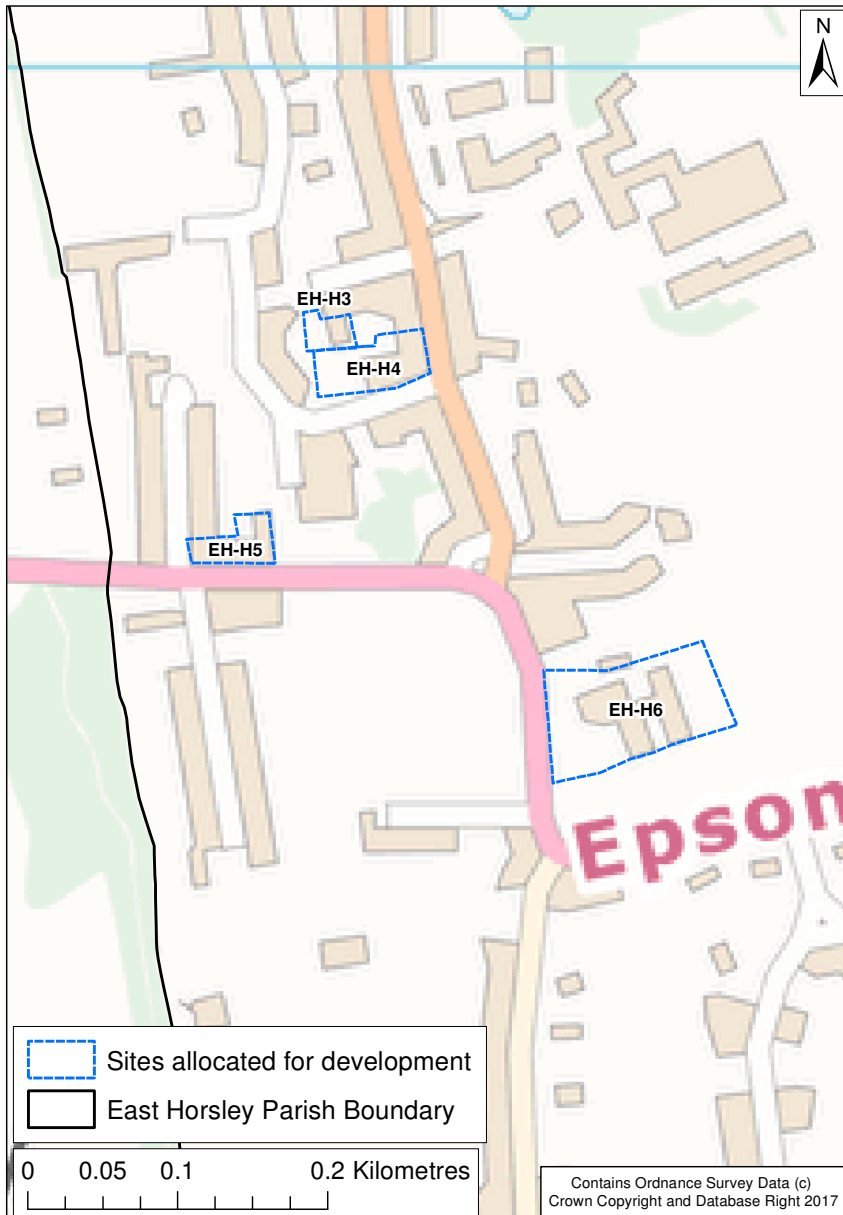
# A East Horsley Neighbourhood Plan - Proposed Areas for Development

The following Appendix provides extracts from the East Horsley Neighbourhood Plan which show where the proposed areas allocated for future residential development are located, and assesses the location of these in relation to the Thames Basin Heaths SPA Zone of Influence.

### A.1 Site Allocation Policies

Policies EH-H3 to EH-H6 of the East Horsley Neighbourhood Plan set the strategic direction for the neighbourhood area with regards to future residential development. The plan recognises that the village lies within the Metropolitan Green Belt and has a well-defined settlement area of 193 hectares, representing 26% of the neighbourhood area. Under the emerging GBC Local Plan, it is proposed that the settlement area of East Horsley is increased to 264 hectares in total, an increase of 37% over its present size. Additionally, the emerging GBC Local Plan proposes to inset the expanded settlement area from the Green Belt, except for certain areas in the south of the settlement, which will still remain as Green Belt.

The sites to be allocated for residential development are shown and listed below:



- EH-H3 - Countryside Depot
- EH-H4 - BT Telephone Exchange
- EH-H5 - Carlans Garage
- EN-H6 - Thatcher's Hotel

Policies EH-H3 to EH-H6 aim to protect the broader environment and wildlife habitats of the neighbourhood area and to direct development away from land that strongly serves the purposes of the Green Belt as set out in National Planning Policy Framework paragraph 80.

Additionally, policies EH-H8 and EH-H9 are concerned with small-scale re-build and infill developments. It is envisaged that the sites allocated for residential development, together with small-scale re-build and infill developments that become available over the Plan period, will enable East Horsley to meet both the housing needs of the local community.

#### A.1.1 EH-H3 - Countryside Depot

This brownfield site of 0.075 hectares lies within the current settlement area on the eastern side of St Martin's Close. It is owned by Surrey County Council and leased to Surrey Wildlife Trust as a storage depot. Plans to relocate this function to another Wildlife Trust depot mean that this site is expected to become available for development within the medium term.

The site is close to St Martin's Court with its community centre, St Martin's Bowling Green and St Martin's Church, as well as the shopping area of Bishopmead Parade. A nearby bus stop on the A246 provides regular services to Guildford and Epsom. This site falls adjacent to the East Horsley Conservation Area.

This site is within the 5 km to 7 km zone of the Thames Basin Heaths Special Protection Area (Ockham and Wisley Common SSSI), and Natural England have confirmed that developments of fewer than 50 homes in this zone would not require mitigation through GBC's Thames Basin Heaths Special Protection Area Avoidance Strategy 2009 – 2016. This site proposes 5 homes.

The development of this site will not have significant impacts on any other designated sites including SSSIs.

The Neighbourhood Plan will support planning permission for the development of 0.075 hectares at this site, subject to the following criteria:

- a. The provision of up to 5 homes; and
- b. These homes should be designed to be suitable for the elderly (1 and 2 beds) or for downsizers (2 and 3 beds); and
- c. The development design should not affect the neighbouring amenity nor have detrimental impact on the adjacent Conservation Area street scene; and
- d. All parking requirements for residents and visitors must be contained within the curtilage of the site.

This site could potentially be developed in conjunction with the adjacent BT Telephone Exchange site (see section A.1.2 below).

#### A.1.2 EH-H4 - BT Telephone Exchange

This brownfield site of 0.22 hectares lies within the current settlement area at the corner of St Martin's Close and Ockham Road South. It functions as a telephone exchange, owned and operated by BT. In the longer term, it is anticipated that BT are likely to sell this now partially disused site, as they have with other telephone exchanges across the country, although no firm plans are presently in place.

This site falls within the East Horsley Conservation Area and is part designated as an Area of High Archaeological Potential. It is close to St Martin's Court, St Martin's Bowling Green, St Martin's Church and Bishopmead Parade local centre.

This site is within the 5 km to 7 km zone of the Thames Basin Heaths Special Protection Area (Ockham and Wisley Common SSSI), and Natural England have confirmed that developments of fewer than 50 homes in this zone would not require mitigation through GBC's Thames Basin Heaths Special Protection Area Avoidance Strategy 2009 – 2016. This site proposes 10 homes.

The development of this site will not have significant impacts on any other designated sites including SSSIs.

The Neighbourhood Plan will support planning permission for the development of 0.22 hectares at this site, subject to the following criteria:

- a. The provision of up to 10 homes; and
- b. These homes should be designed to be suitable for downsizers (2 and 3 beds) and the elderly (1 and 2 beds); and
- c. The development design should not affect the neighbouring amenity nor have detrimental impact on the adjacent Conservation Area street scene; and
- d. All parking requirements for residents and visitors must be contained within the curtilage of the site.

The policy also supports the development of flexible offices (B1a) of up to 250 square metres in total floor space, (equivalent to 2,691 square feet). Such offices must include appropriate parking provision within the curtilage, whilst the building design must be sympathetic with the surrounding Conservation Area.

### A.1.3 EH-H5 - Carlians Garage

Carlians Garage is a brownfield site of 0.16 hectares in size, comprised of two adjacent sections under common ownership. It lies within the current settlement boundary of the village on the A246 Guildford Road between Fearn Close and the Limegrove Care Home and presently functions as a sales and service garage for motor vehicles.

This site is within the 5 km to 7 km zone of the Thames Basin Heaths Special Protection Area (Ockham and Wisley Common SSSI), and Natural England have confirmed that developments of fewer than 50 homes in this zone would not require mitigation through GBC's Thames Basin Heaths Special Protection Area Avoidance Strategy 2009 – 2016. This site proposes 14 homes.

The development of this site will not have significant impacts on any other designated sites including SSSIs.

The Neighbourhood Plan will support planning permission for the development of 0.22 hectares at this site, subject to the following criteria:

- a. The provision of up to 10 homes; and
- b. The majority of these homes should be designed to be suitable for first time buyers (1 and 2 beds); and
- c. The development should not affect the amenity of adjacent properties, in particular the houses of Rosewood and Chapel Porth in Fearn Close and Limegrove Care Home in St Martin's Close, not have a detrimental impact on the nearby street scene; and
- d. All parking requirements for residents and visitors must be contained within the curtilage of the site, including sufficient space for temporary stopping by delivery trucks, refuse vehicles, etc., without them blocking the busy A246.

### A.1.4 EH-H6 - Thatcher's Hotel

This site is a brownfield site of 0.74 hectares in size and is proposed by the current landowner for housing re-development. The total area of the hotel grounds is 1.3 hectares, but only 0.74 hectares fall within the existing settlement area of the village. It lies within a right-angle bend of the A246 near one of the main entrances leading to the village centres. Access is near the junction with the B2039 Ockham Road South.

The hotel is a landmark building in a prominent position beside open parkland near to the East Horsley Conservation Area and overlooking Horsley Towers, a key heritage asset of the village.

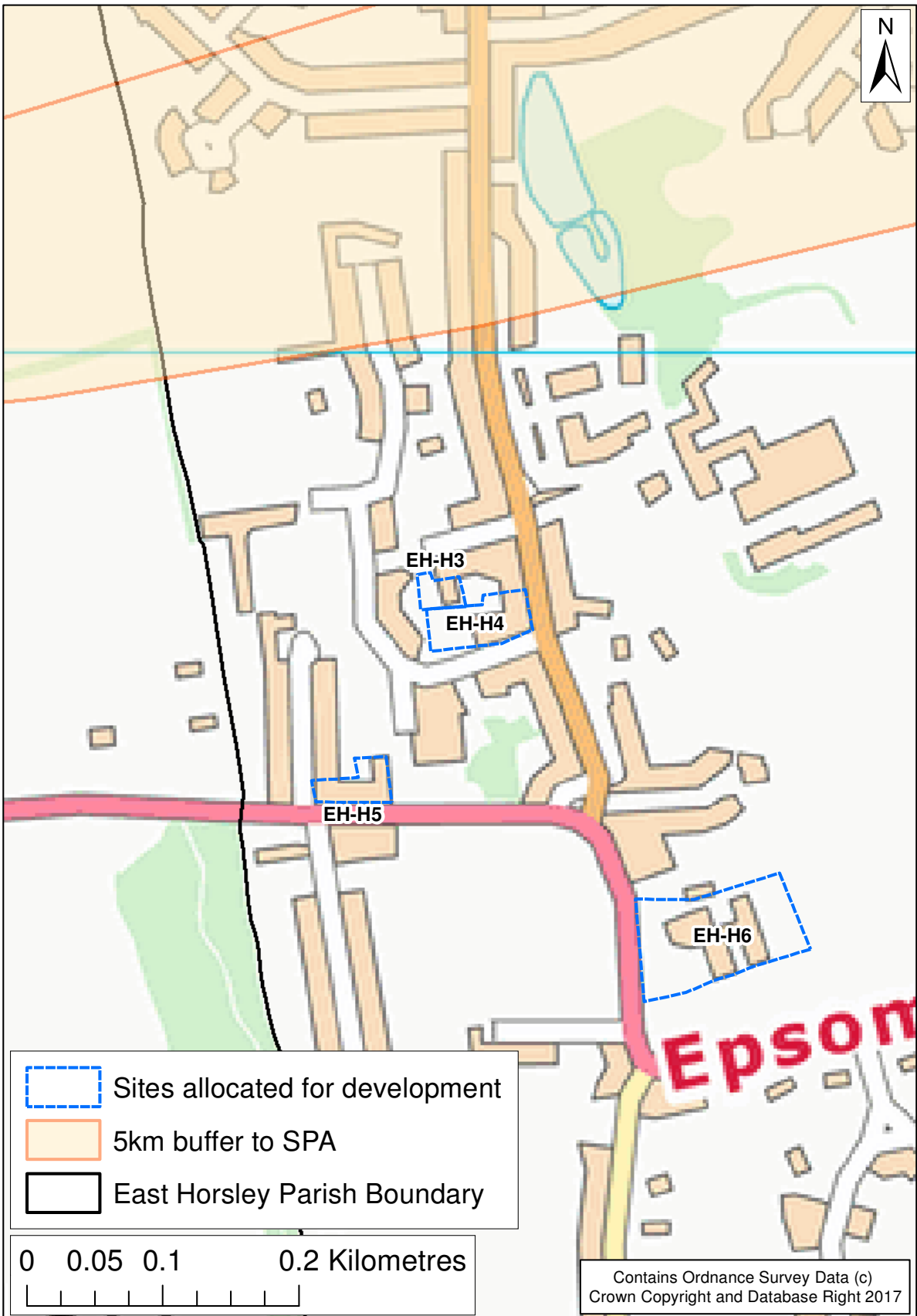
This site is within the 5 km to 7 km zone of the Thames Basin Heaths Special Protection Area (Ockham and Wisley Common SSSI), and Natural England have confirmed that developments of fewer than 50 homes in this zone would not require mitigation through GBC's Thames Basin Heaths Special Protection Area Avoidance Strategy 2009 – 2016. This site proposes 22 homes.

The development of this site will not have significant impacts on any other designated sites including SSSIs.

The Neighbourhood Plan will support planning permission for the development of 0.74 hectares at this site, subject to the following criteria:

- a. The provision of up to 22 homes (market and affordable), to be located within the existing settlement area; and
- b. Compliance with the housing mix ranges as proposed in Policy EH-H1, which mix ranges shall apply even if the development is proposed for less than 20 dwellings; and
- c. The original front building, which is of Chown design, should be retained if at all possible and converted into apartments or other housing; and
- d. Mature tree screening from the A246 should be maintained; and
- e. The Lovelace boundary wall on the southern and western boundaries adjacent to the A246 is a distinctive landmark feature and should be maintained; and
- f. A publicly-accessible footpath is provided allowing passage through or around the site from beside the petrol filling station to the pavement on the A246 Guildford Road close to the entrance of The Warren; and
- g. The loss of the hotel facility must be appropriately justified in the planning application in accordance with the applicable local plan.

**A.2 Location of Development Sites in Relation to the Thames Basin Heaths SPA Zone of Influence**



## References

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**Appendix 2: Consultation email sent to Natural England, Historic England and the Environment Agency**

(See next page)

## Gavin Stonham

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**From:** Laura Thomas <Laura.Thomas@jbaconsulting.com>  
**Sent:** 15 August 2017 17:00  
**To:** consultations@naturalengland.org.uk; southeast@HistoricEngland.org.uk; enquiries@environment-agency.gov.uk  
**Cc:** Gavin Stonham  
**Subject:** East Horsley Neighbourhood Plan Strategic Environmental Assessment Screening  
**Attachments:** 2017s5504 East Horsley NP SEA and HRA V3 FINAL.PDF  
**Categories:** Yellow Category

Dear Sir/Madam,

I am contacting you regarding the East Horsley Neighbourhood Plan. Residents of East Horsley, with the support of East Horsley Parish Council and Guildford Borough Council is in the process of developing the Neighbourhood Plan for the neighbourhood area.

In order to determine whether or not the Plan requires a Strategic Environmental Assessment (SEA) a screening assessment has been carried out. After consideration, it is considered that the East Horsley Neighbourhood Plan does not require a SEA. To support this decision a Habitats Regulations Assessment screening has also been undertaken. Please find attached a report supporting this conclusion for your consideration.

If you disagree with our determination that the Plan will have no significant environmental effects and does not therefore a SEA, you are invited to make representations in writing, to [laura.thomas@jbaconsulting.com](mailto:laura.thomas@jbaconsulting.com) by **Friday 6<sup>th</sup> September 2016**.

Kind Regards,

**Laura Thomas**  
*Chartered Senior Ecologist*

My usual working days are Tuesday, Wednesday and Thursday.

[Click here to find out how we can help you with your development projects.](#)

**JBA Consulting, Epsom House, Chase Park, Redhouse Interchange, Doncaster, South Yorkshire, DN6 7FE. Telephone: +44 1302 337798**

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### **Appendix 3: Consultation response from Natural England**

(See next page)

Date: 04 September 2017  
Our ref: 223513



Guildford Borough Council

**BY EMAIL ONLY**

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

T 0300 060 3900

Dear Laura Thomas

**Planning Consultation: East Horsley Neighbourhood Plan Strategic Environmental Assessment (SEA) and Habitat Regulations Assessment (HRA) Screening**

Thank you for your consultation on the above dated 15 August 2017.

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

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where our interests would be affected by the proposals made.

In our review of the East Horsley Neighbourhood Plan SEA screening we note that there are both designated sites and protected landscapes within the impact zones of the Neighbourhood Plan area, however, the Plan allocates only small additional sites for development, which by virtue of their small scale and location will not result in any significant impacts on either designated sites or protected landscapes, including Natura 2000 sites.

As a result we agree with the assessment that the Neighbourhood Plan does not require an SEA or an HRA.

Whilst we note that the allocated sites for housing lie between 5 and 7km from the Thames Basin Heaths Special Protection Area (SPA), we acknowledge that the total number of new residential units proposed in the plan is less than 50, with the largest individual site providing 22 dwellings. Therefore no Suitable Alternative Natural Greenspace (SANG) provision would be required.

Furthermore, whilst we understand that the allocated sites for housing lie within the setting of the Surrey Hills AONB, we acknowledge that by virtue of the fact that none of the sites are on greenfield land and that the settlement boundary will not change as a result of development, the landscape character of the AONB setting will not be impacted.

Further Recommendations

We would like to draw your attention to the requirement to conserve biodiversity and provide a net gain in biodiversity through planning policy (Section 40 of the Natural Environment and Rural Communities Act 2006 and section 109 of the National Planning Policy Framework). Please ensure that any development policy in your plan includes wording to ensure "all development results in a biodiversity net gain for the parish".

The recently produced [Neighbourhood Plan for Benson](#), in South Oxfordshire provides an excellent example. Although the Plan has not been to referendum yet, we are of the opinion that the policy wording around the Environment, Green Space and Biodiversity is exemplary. We would recommend that you consider this document, when reviewing yours.

Yours sincerely

Chris Baines  
Sustainable Development Adviser  
Thames Team