



## **Guildford Borough Council**

# **Ash Neighbourhood Plan Scoping Report and Action Plan 2024**

# **Strategic Environmental Assessment and Habitat Regulations Assessment Screening Report and Determinations**

January 2025

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# 1. Introduction

## The Purpose of this report

- 1.1 Guildford Borough Council ('GBC') has received notification from Ash Parish Council that they intend to prepare the Ash Neighbourhood Plan (the 'NP'). Shortly after the designation of the Ash Neighbourhood Area, Ash Parish Council submitted a SEA Screening Opinion letter, as well as a draft Scoping Report and Action Plan (the 'Scoping Report') to Guildford Borough Council. The SEA screening letter requests GBC to produce a screening opinion. The Scoping Report sets out provisional policy ideas, as well as the purpose and need for the NP.
- 1.2 The purpose of this report is to ascertain whether the NP may have a significant effect on the environment and therefore require a Strategic Environmental Assessment ('SEA') under European Directive 2001/42/EC (the 'SEA Directive') and Environmental Assessment of Plans and Programmes Regulations 2004 (the 'SEA Regulations').
- 1.3 It also determines whether the Neighbourhood Plan would require a Habitats Regulations Assessment ('HRA') in accordance with European Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the 'Habitats Directive') and the associated Conservation of Habitats and Species Regulations 2017 (the 'Habitats Regulations'). To this end, a screening exercise is undertaken to determine whether a significant effect on the habitat and species protected by the regulations is likely.
- 1.4 The legislative background, set out in Section 2, outlines the regulations that stipulate the need for this screening exercise. Section 3 describes the proposal that is subject to SEA and HRA screening. Sections 4 and 5 provide screening assessments which are used to determine whether there are likely to be any significant environmental effects which would trigger a requirement for a full SEA (Environmental Report) and/or HRA (Appropriate Assessment).

# 2. Legislative background

## Habitat Regulations Assessment

- 2.1 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/EEC and transposed into British Law by Regulation 105 of the Habitats Regulations.
- 2.2 The Habitats Regulations transpose Council Directive 92/43/EEC, on the conservation of natural habitats and of wild fauna and flora (EC Habitats Directive), into UK law. They also transpose elements of the EU Wild Birds Directive in England and Wales. They require HRA to be undertaken for any plan or project likely to have a significant effect upon a European protected site.

- 2.3 An HRA is required for a plan or project to assess the potential implications for European wildlife sites, i.e. 'European sites' or 'Natura 2000 sites'. It explores whether the implementation of a plan or project would harm the habitats or species for which the European sites are designated. The European sites are:
- Special Protection Areas (SPAs) – designated by the Birds Directive (79/409/EEC as amended and 2009/147/EC), and:
  - Special Areas of Conservation (SACs) – designated by the Habitats Directive (92/43/EEC).
- 2.4 Ramsar sites are designated under the Ramsar convention. The Ramsar convention's mission is to conserve and sustainably utilise wetland habitats. Although Ramsar sites are not covered by the Habitats Regulations, as a matter of Government Policy, they should be treated in the same way as European wildlife sites (i.e. SPAs and SACs). European wildlife sites and Ramsar sites are collectively known as internationally designated wildlife sites. Sites of Community Importance (SCIs), which are sites that have been adopted by the European Commission but not yet formally designated by the government, must also be considered.
- 2.5 It is a requirement of Article 102 of the Habitats Regulations 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.
- 2.6 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 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)".
- 2.7 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, which is the case for the Ash proposal.

### **Strategic Environmental Assessment**

- 2.8 The purpose of SEA is to integrate considerations of the environment into the preparation and adoption of plans with a view to promoting sustainable development. Under the requirements of the SEA Directive and the SEA Regulations, specific types of plans that set the framework for the future development consent of projects must be subject to an environmental assessment.
- 2.9 In accordance with the provisions of the SEA Directive and the SEA Regulations (Regulation 9 (1)), the Council must determine whether a plan requires an environmental report. If the Council determines that an environmental report is not required, Regulation 9(3) requires the Council to prepare a statement setting out the reasons for the determination.

- 2.10 SEA involves evaluation of the environmental impacts of a plan or programme. The SEA Directive sets out a legal assessment process that must be followed. Often within the planning context, the SEA requirements are met by incorporating it within a Sustainability Appraisal (SA), which is a requirement for Development Plan Documents, but not neighbourhood plans.
- 2.11 The Planning Practice Guidance makes it clear that SEA may be of relevance for neighbourhood plans where they could have significant environmental effects. To establish whether the plan proposal is thought to have significant environmental effects and therefore require an SEA environmental report, a screening process is necessary.

### **3. Ash Neighbourhood Plan Proposals**

- 3.1 The proposed plan will form part of the statutory Development Plan for the borough but covering only the designated Ash Neighbourhood Area (the 'NA'). The NA follows the Ash Parish boundary as shown in the map in Appendix 1. As a Development Plan Document, planning decision makers will use the Ash Neighbourhood Plan to decide whether applications for planning permission should be granted.
- 3.2 Guildford Borough Council received a request for SEA and HRA screening from Ash Parish Council. Within these screening requests were a description of the relevant planning issues, and the results of a scoping session discussion, which recognised the policy areas that Ash Parish Council may want to cover. The details are set out in the following section, and this will be used as the basis of the SEA and HRA screening assessments.

#### **Proposed possible policy areas**

- 3.3 The following proposed possible policy areas have been taken from the draft Scoping Report and Action Plan, attached at Appendix 2.
- A1 – Spatial Strategy: The reinforcement of original identities of individual settlements within the NA. Consideration of identifying unique characteristics, and a policy which considers 'gaps' between settlements.
  - A2, A3, A4 – Design Principles Ash, Ash Vale and Ash Green (respectively): Policy which ensures that future development is sensitive to any defined characteristics for each settlement. The introduction of a design code, to provide nuanced local detail. Discussion around Ash Vale's settlement status.
  - A5 – District and Local Centres and Dispersed Local Shops: Analysis of existing district and local shopping centres in the area, with discussion of how much scope there would be to create a new local centre. Consideration of policy which encourages the retention of ground floors in active commercial use, and discouraging change of use to residential within these areas.
  - A6 – Employment Locations: To support and enhance a good employment network in Ash, the identification of employment locations in Ash. Policy A7 proposes the

identification of opportunities for development on brownfield land, and this policy proposes identification of employment sites that should be protected when policy A7 is enacted.

- A7 – Development Opportunities (Brownfield): To protect Ash from further greenfield development, this policy seeks to address the redevelopment of brownfield sites within the NA. Additional consideration of potential SPA 400m buffer constraints, which would restrict development on some brownfield sites.
- A8 – Housing Mix, Type and Tenure: Ash Parish Council have confirmed that affordable homes within the NA would be desirable, and so have proposed a policy which would define the mix and type of residential development to come forward including from the identified brownfield sites. Additionally, they would seek to set a level of affordable housing provision that needs to come forward with development in the area. They have identified that brownfield sites can be unviable with a high percentage of affordable units, and so there is also scope for consideration of a different standard for brownfield development.
- A9 - Existing & New Local Community Assets: Policy which is intended to protect existing local community facilities/assets. This is proposed via the demonstration of how each asset is valuable to the local community. To aid this policy, appropriate use classes and service types will be identified by Ash Parish Council, and discussion is necessary to decipher what would be an appropriate use class. For example, public houses and educational facilities. They also look to include scope to support the creation/development of existing facilities, as well as supporting the introduction of new facilities to add to the infrastructure in the area.
- A10 – Green and Blue Infrastructure: A policy which allows for the protection of existing sites, and potentially for designations to allow for improvement and better connectivity. This would require the mapping of sites, to identify potential areas for improvement.
- A11 – Local Green Spaces: The local community in Ash value local green spaces, and this policy would aim to protect spaces recognised as being special to the community. The ambition for this policy would be to introduce a high level of protection to these spaces from development. The policy/plan could address concerns regarding future public access to Ash Ranges.
- A12 – Thames Basin Heath SPA: Recognising that the NA falls within the 400m and 5km SPA buffer zones, Ash Parish Council are looking to include a policy which would further protect the SPA, alongside the Local Plan, and Thames Basin Heath SPA SPD.
- A13 – Active Travel: Ash Parish Council have identified active travel as an area of improvement. To try and improve travel in the NA, Ash Parish Council are looking to map out the existing travel network within the NA, and include within the NP, to protect it and identify areas of improvement, so that decision makers and developers can see areas of need when making financial or community contributions.

## **Other information**

3.4 Ash Parish Council have recognised that to build an evidence base for the Neighbourhood Plan, technical studies would need to be undertaken. At this early stage, they have identified the potential need for the following studies:

- Strategic Environment Assessment (following the outcome of this report)
- Assessment under the 2010 Habitat Regulations
- Design code guidance (already underway)
- Housing needs assessment (already underway)

## **Plan boundary**

3.5 The NA/civil parish boundary comprises the villages of Ash Vale, Ash and Ash Green. Ash Parish has a total population of approximately 18,295 people<sup>1</sup>. The A323 runs through the southern half of the NA. The A331 and A31 are close by to the NA, which connects the area to Frimley and Farnham, as well as Guildford. There are several train stations within the boundary of the NA; North Camp, Ash Vale, and Ash stations.

## **Heritage and character**

3.6 Ash parish is situated within a lowland landscape of London Clay to the south and undulating sands to the north. The area is described as “...a lowland landscape encompassing the River Blackwater and associated terrace to the west, with the claylands to the south east and distinctive stretches of heath (predominantly in military use) to the west and north east” in Guildford Borough Council’s Landscape Character Assessment & Guidance Jan 2007<sup>2</sup>.

3.7 Ash village has a mixed urban and rural character. There are homes that run along the main road, as well as homes that are in more rural locations as well as homes in cul de sacs. The homes are mixed in architectural style. There are many businesses in the NA, mainly comprising retail services. There are several retail and shopping centres which are within the NA.

3.8 There are also several railway stations which are located within the NA (Ash, Ash Vale and North Camp). These stations have direct and indirect links to London Waterloo station, Reading, Gatwick, and Farnham.

3.9 The northeastern quadrant of the NA is covered by Green Belt. The areas of land that are not covered by Green Belt are mostly designated as Urban Area. This again presents a mix of both rural and urban settings which cover the NA.

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<sup>1</sup> Gathered from an FOI request to the Office of National Statistics, covering ‘the number of persons by single year of age and sex for 2022 parishes in England and Wales, mid-2021. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/adhocs/2441parishpopulationestimatesformid2021basedonbestfittingofoutputareastoparishes>

<sup>2</sup> Available at: <https://www.guildford.gov.uk/article/24720/What-is-a-Landscape-Character-Assessment>

- 3.10 There is a thin stretch of Conservation Area which runs directly down the middle of the NA from the northern boundary to the centre of the NA. This is the Basingstoke Canal South Conservation Area which is characterised by bridges, tunnels and earthworks. These are mainly structures that were built in the 18<sup>th</sup> and 19<sup>th</sup> centuries. This adds to the character of the Ash NA.
- 3.11 There is one County Site of Archaeological Importance; a medieval moated site at Ash Manor, which is believed to have been erected in the 13<sup>th</sup> century. The house was divided into two houses in the 20<sup>th</sup> century. It is a grade II listed building, which was designated in 1967.
- 3.12 There are five Areas of High Archaeological Potential that fall within the NA.
- 3.13 There are sixteen listed buildings, and 32 locally listed buildings contained within the NA.

### **Natural Environment**

- 3.14 Two Sites of Special Scientific Interest (SSSI) (Basingstoke Canal and Ash to Brookwood Heaths) fall partially within the NA, both covering the northern half of the NA. The Ash to Brookwood Heath SSSI is large, and also spans Normandy and Pirbright parishes.
- 3.15 There are 7 Sites of Nature Conservation Importance (SNCI) which are located across the entire NA. One of the sites (Ash Green Woods) falls into the adjoining parish boundary (Normandy).
- 3.16 There is one Special Protection Area (SPA) site within the NA (Thames Basin Heaths), which covers half of the northern section of the NA. There is one Special Area of Conservation (SAC) site within the NA (Thursley, Ash, Pirbright & Chobham), which has a boundary identical to the SPA designation. This also covers half of the northern section of the NA.
- 3.17 The NA contains 9 patches of ancient woodland.
- 3.18 There are two Local Nature Reserves within the NA (Lakeside Park and Snaky Lane). Lakeside Park is a former gravel works, which consists of lakes, reed beds, rough grassland, heath, scrub and woodland, and adjoins the Basingstoke Canal. There are multiple species found at this nature reserve. Snaky Lane consists of mature trees, grassland, scrub, hedgerows and a pond.
- 3.19 There are multiple water courses which run through the NA. Most significantly, parts of the Blackwater River and Basingstoke Canal have stretches through the NA. These are classified as ordinary watercourses.
- 3.20 There are three Biodiversity Opportunity Area sites which fall within the NA; Wanborough and Normandy Woods, Blackwater River and Ash, Brookwood and Whitmoor Heath.



## 4. Habitat Regulations Assessment Screening

### HRA Methodology

4.1 HRA follows a three-stage process as outlined in the Department Environment, Food and Rural Affairs and Natural England guidance "Habitats regulations assessments: protecting a European site"<sup>3</sup>. These stages are described below:

#### HRA Stage 1 – Screening

4.2 This process identifies the likely effects upon a European site of a project or plan, either alone or in combination with other projects or plans, and determines whether these effects are likely to be significant.

4.3 Following the ECJ judgement in the case of “people over wind” (Case C-323/17), measures that are necessary to avoid or reduce impacts on the European site, even when considered standard environmental best-practice, cannot be taken into account at this stage.

4.4 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, the 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.

4.5 It is recognised that some policy ‘types’ cannot affect any European sites. Different guidance documents suggest various classification and referencing systems to help identify those policies that can be safely screened out to ensure the HRA focuses on the policies with any potential to result in likely significant effects.

4.6 Table 1 below summarizes the characteristics of policies that can usually be screened out.

*Table 1 Policy “types” that can usually be screened out*

Broad Policy Type	Notes
<b>General statements of policy</b>	The European Commission recognises that plans or plan components that are general statements of policy or political aspirations cannot have significant effects
<b>General design/guidance criteria</b>	A general “criteria based” policy expresses the tests or expectations of the plan-making body when it comes to consider particular proposals, or relate to design or other qualitative criteria which do not themselves lead to development (e.g. controls on building design)
<b>External plans/projects</b>	Plans or projects that are proposed by other plans and are referred to in the plan being assessed for completeness

<sup>3</sup> Available online at <https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site>

<b>Environmental protection policies</b>	Policies designed to protect the natural or built environment will not usually have significant or adverse effects
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- 4.7 If no likely significant effects are determined, the project or plan can proceed. If any likely significant effects are identified, stage 2 commences.
- 4.8 European case law has ruled that the question of whether an effect would be “significant” is linked to the site’s conservation objectives. Under this test:
- A “significant effect” only includes effects that would undermine a European site’s conservation objectives, for example by reducing the area or quality of protected habitat for which the site was designated, or by the disturbance or displacement of species for which the site was designated.
  - A plan or project with effects that do not impact on a European site’s conservation objectives would not be considered “significant” for the purpose of this decision. For example, this might be the case for low-impact temporary effects, or effects such as the loss of a small area of land which is not an interest feature of the site and has no effect, or an insignificant effect, on the habitat or species which are an interest feature.
- 4.9 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 stage 2).

#### **HRA Stage 2 – Appropriate Assessment**

- 4.10 Stage 2 is subsequent to the identification of likely significant effects upon a European site in stage 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.
- 4.11 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). If no adverse impact is determined, the project or plan can proceed.
- 4.12 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. 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. If no suitable avoidance/mitigation or alternative options are identified, as a rule the project or plan should not proceed.
- 4.13 If an adverse impact is identified following consideration of avoidance/mitigation and alternatives, stage 3 is commenced.

### **HRA Stage 3 – Derogation**

- 4.14 In certain circumstances a proposal which has failed the integrity test can go ahead. Three legal tests must be passed for a derogation to be granted.
1. There are no feasible alternative solutions that would be less damaging or avoid damage to the site.
  2. The proposal needs to be carried out for imperative reasons of overriding public interest.
  3. The necessary compensatory measures can be secured.

### **HRA Screening Assessment**

#### **Limitations**

- 4.15 The precise detail of the NP policies is currently unknown. If the policies deviate from the NP policy ideas set out in section 3, the HRA assessment must be revisited.

#### **European sites**

- 4.16 Part of the following European sites fall within the Ash Neighbourhood Area (see map at Appendix 1).
- Thames Basin Heaths SPA.
  - Thursley, Ash, Pirbright & Chobham SAC.
- 4.17 All or part of the following European sites fall within 10 km of the Ash Neighbourhood Area (see map at Appendix 1).
- Thursley, Hankley and Frensham Commons SAC.
  - Thames Basin Heaths SPA
  - Thursley & Ockley Bogs Ramsar Site
- 4.18 All these sites are relevant to the assessment.

#### **Potential impacts and pathways of impact**

- 4.19 Neighbourhood Plans can potentially have adverse impacts on the habitats and species for which European sites are designated by guiding the design of new developments, supporting development in the area, and the refusal/approval of development in the area. These impacts can be direct, such as habitat loss, fragmentation or degradation, or indirect, such as disturbance from recreational activities, and water and air pollution from construction and transport.
- 4.20 It is established that when new homes are built within the vicinity of the Thames Basin Heaths SPA, the resulting increase in recreational pressure and the effects of urbanisation can have negative impacts on the populations of the three bird species for which the SPA is designated. As a result:
- Net new residential development is prohibited within 400m of the SPA.

- Within 5km, the recreational impact of all net new residential development must be mitigated through the provision of Suitable Alternative Natural Greenspace (SANG) to attract visitors away from the SPA and by funding the Strategic Access Management and Monitoring programme (SAMM).
- Within the 5-7km zone, residential developments of over 50 net new dwellings only may be considered to have a recreational impact, established on a case-by-case basis.

4.21 Ash Neighbourhood Area falls within the SPA and SAC boundaries and the SPA 400m and 5km zones.

4.22 More detail on this approach is provided in the SPA Strategy.<sup>4</sup>

4.23 The qualifying features and conservation objectives for the European sites are set out in Table 2.

4.24 Table 3 identifies the hazards to which the sites are potentially sensitive.

*Table 2 Details of European Sites within 10km buffer around Guildford Borough (data sourced from Natural England)<sup>5</sup>*

European Site	Qualifying Features and Conservation Objectives
<b>Thames Basin Heaths SPA</b>	<p><b>Qualifying Features:</b></p> <ul style="list-style-type: none"> <li>• A224 <i>Caprimulgus europaeus</i>; European nightjar (Breeding)</li> <li>• A246 <i>Lullula arborea</i>; Woodlark (Breeding)</li> <li>• A302 <i>Sylvia undata</i>; Dartford warbler (Breeding)</li> </ul> <p><b>Conservation objectives:</b></p> <p>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> <li>• The distribution of the qualifying features within the site.</li> </ul>
<b>Thursley, Ash, Pirbright &amp; Chobham SAC</b>	<p><b>Qualifying Features:</b></p> <ul style="list-style-type: none"> <li>• H4010. Northern Atlantic wet heaths with <i>Erica tetralix</i>; Wet heathland with cross-leaved heath</li> <li>• H4030. European dry heaths</li> <li>• H7150: Depressions on peat substrates of the <i>Rhynchosporion</i></li> </ul> <p><b>Conservation objectives:</b></p> <p>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,</li> </ul>

<sup>4</sup> Available at [Thames Basin Heaths Special Protection Area SPD - Guildford Borough Council](#)

<sup>5</sup> Available at [Natural England Access to Evidence - Conservation objectives European Sites: London and South East](#)

	<ul style="list-style-type: none"> <li>• The structure and function (including typical species) of qualifying natural habitats, and</li> <li>• The supporting processes on which qualifying natural habitats rely.</li> </ul>
<b>Thursley &amp; Ockley Bogs Ramsar Site</b>	<p><b>Qualifying Features:</b></p> <ul style="list-style-type: none"> <li>• Ramsar criterion 2: a community of rare wetland invertebrate species including notable numbers of breeding dragonflies.</li> <li>• Ramsar criterion 3 - supports all six native reptile species and nationally important breeding populations of European nightjar <i>Caprimulgus europaeus</i> and woodlark <i>Lullula arborea</i>.</li> </ul> <p><b>Conservation objectives<sup>6</sup>:</b></p> <ul style="list-style-type: none"> <li>• Work towards the wise use of all wetlands;</li> <li>• Designate suitable wetlands for the list of Wetlands of International Importance (the “Ramsar List”) and ensure their effective management;</li> <li>• Cooperate internationally on transboundary wetlands, shared wetland systems and shared species</li> </ul>

*Table 3 Threats and pressures for each SPA and SAC site identified as potentially being affected by the plan (data sourced from the Joint Nature Conservation Committee (JNCC)<sup>7</sup>)*

Threats and pressures	Thames Basin Heaths SPA	Thursley, Ash, Pirbright & Chobham SAC	Thursley, Hankley and Frensham Commons SPA
<b>A04 Grazing</b>		Yes	
<b>B02 Forest and Plantation management &amp; use</b>	Yes		
<b>G01 Outdoor sports and leisure activities, recreational activities</b>	Yes		Yes
<b>G05 Other human intrusions and disturbances</b>	Yes	Yes	Yes
<b>H04 Air pollution, air-borne pollutants</b>	Yes	Yes	Yes
<b>J02 Human induced changes in hydraulic conditions</b>		Yes	
<b>K02 Biocenotic evolution, succession</b>	Yes	Yes	Yes

#### Potential for in-combination effects

4.25 A description of the guidance is provided in Section 3. The NP will become statutory policy for the Development Plan for the borough of Guildford.

<sup>6</sup> Information sourced from <https://www.ramsar.org/about/convention-wetlands-and-its-mission#:~:text=work%20towards%20the%20wise%20use,wetland%20systems%20and%20shared%20species>

<sup>7</sup> SAC data sourced from <https://sac.jncc.gov.uk/>. SPA data sourced from <https://jncc.gov.uk/our-work/list-of-spas/>

- 4.26 A series of individually modest effects may in-combination produce effects that are likely to adversely affect the integrity of one of 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 projects. The Directive does not explicitly define which other plans and projects are within the scope of the in-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’.*
- 4.27 Table 4 lists the relevant plans and projects that have been identified as having the potential to result in adverse effects on European sites in-combination with the NP.

*Table 4 Other Plans and Projects*

<b>Plan/ Projects</b>	<b>Potential in-combination effects</b>
<b>National Planning Policy Framework (NPPF)</b>	The NPPF sets out national planning policy to be taken into account when preparing new Development Plan Documents and making decisions on planning applications. In relation to conserving and enhancing the natural environment the NPPF states that the planning systems should contribute and enhance the natural and local environment through minimising impacts on biodiversity and providing net gains in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures (paragraph 180). It also requires local planning authorities to include policies against which proposals for any developments on, or affecting, protected habitats will be judged, with distinctions made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status. The presumption in favour of sustainable development, enshrined within the NPPF, <i>“does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site”</i> (paragraph 188). The NP will interact with the NPPF and influence planning decisions. However, it cannot override protections built into the NPPF, or into DPDs which must align with the protections in the NPPF. The NP intends to provide additional protection of European sites so will instead help to deliver the protections established through Development Plan policy, which in turn are aligned with the NPPF.
<b>Guildford Local Plan (comprising the Local Plan: Strategy and Sites (2019), Local Plan Development</b>	Once the Ash NP has passed a local referendum, it will form part of the Development Plan alongside the Local Plan for Guildford. The plan will be tested for general conformity with the Local Plan’s strategic policies during examination and will be amended where it does not conform. The 2019 and 2023 local plans have undergone a Habitats Regulations Assessment and it has been established at examination that they will not lead to adverse effects on the integrity of European sites. Additionally, the 2019 Plan contains a policy (P5) specifically related to the Thames Basin Heath SPA that

<p><b>Management Policies (2023) and remaining policies of the Local Plan 2003)</b></p>	<p>states 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. The two Local Plans contain a number of policies that protect the natural environment. Additionally, the 2019 Plan allocated a number of housing sites within the NA, thus there is potential for additional impacts above those that have already been identified by the SEA/HRA for the Local Plan.</p>
<p><b>Thames Basin Heaths Special Protection Area Avoidance Strategy 2017 Supplementary Planning Document (Guildford Borough Council, 2017)</b></p>	<p>This document was adopted on 18th July 2017. Natural England has recognised that residential development across the South East region could have potentially adverse impacts on the Thames Basin Heaths SPA through increased recreational use creating disturbance impacts. Guildford Borough Council, along with other councils where development has the potential to impact upon the SPA, have therefore adopted avoidance strategies in conjunction with Natural England, to identify where adverse impacts may arise and the avoidance and/or mitigation measures required. The 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 plan may result in adverse impacts on the SPA and this is taken into account throughout this HRA. The strategy is silent on SAC sites. Negative in-combination effects on either the SPA or SACs are therefore unlikely.</p>
<p><b>The South East Plan</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. This policy is linked to the Avoidance Strategy detailed above. Policy NRM6 relates to new residential development which is likely to have a significant effect on the ecological integrity of the Thames Basin Heaths SPA and requires mitigation measures to prevent the adverse impacts. The plan will have to ensure that its policies are consistent with the requirements of policy NRM6 in order to pass examination. The policy is silent on SAC sites. Negative in-combination effects on either the SPA or SACs are therefore unlikely.</p>

**Screening**

4.28 Each part of the proposal has been primarily assessed against the criteria provided in the guidance prepared by Tydesley and Associates for Natural England titled, ‘The Assessment of Regional Spatial Strategies and Sub Regional Strategies under the Provisions of the Habitats Regulations 2006.’The analysis details are presented in Table 5. Table 5 Ash Neighbourhood Plan Proposal screening

<p><b>Guidance sections</b></p>	<p><b>Likely to have an impact</b></p>	<p><b>Why guidance will have no impact on Natura 2000 sites</b></p>	<p><b>Essential recommendations to avoid potential negative effects on European sites</b></p>
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<b>A1 – Spatial Strategy</b>	<b>Yes</b>	A spatial strategy has potential to bring direct and indirect impacts on SPA and SAC sites by directing development towards vulnerable locations.	<b>The policy should not support proposals that could lead to an impact on European sites.</b>
<b>A2 – Design Principles Ash</b>	<b>No</b>	The proposed policy looks to regulate the design of new buildings in Ash through a design code based policy. These design principles alone will not lead to development. This would not result in a pathway of impact to Natura 2000 sites for any of the identified threats and pressures.	<b>None</b>
<b>A3 – Design Principles Ash Vale</b>	<b>No</b>	See comments on policy A2	<b>None</b>
<b>A4 – Design Principles Ash Green</b>	<b>No</b>	See comments on policy A2	<b>None</b>
<b>A5 – District and Local Centres and Dispersed Local Shops</b>	<b>Yes</b>	There is potential for such a policy to influence land use in a way that could have environmental effects e.g. by identifying land for new economic development. Additionally, the provision of new space for retail units could lead to an increase in visitor footfall, which could lead to adverse impacts on Natura 2000 sites. However, encouraging footfall in additional retail centres may draw visitors and residents away from SPA sites (which suffer from recreational pressure). Some of the proposed ideas and suggestions are within a close distance to Natura 2000 sites means that a pathway of impact is identified.	<b>The provision of new retail centres are created with the proximity of Natura 2000 sites in mind. In particular, mindfulness to the fact that large amounts of residential dwellings are within the SPA 400m buffer zone, and the provision of new retail centres within this zone could have an impact e.g. through uncontrolled parking which increases access to the SPA.</b>
<b>A6 – Employment Locations</b>	<b>No</b>	A retention policy designed to protect local employment locations would generally not be considered to lead to likely significant effects as it preserves the status quo. Ash Parish Council’s proposals seek to protect existing	<b>None</b>



		brownfield land from loss of employment opportunities. In this case, there would be no pathway of impact identified for any of the threats and pressures.	
<b>A7 – Development opportunities (brownfield)</b>	<b>Yes</b>	The plan may lead to development on brownfield sites. While it also proposes a policy identifying where this would not be permitted in order to avoid harm to the SPA, the policy is not yet drafted so harm to the SPA cannot be ruled out. Harm could stem from any type of development within the immediate vicinity of the SPA (including residential development within 400m), and residential development elsewhere in the NA through increased recreational pressure.	<b>The allocation of brownfield sites should be undertaken with the proximity of Natura 2000 sites in mind, and in a way which that avoids impact to the SPA. A mitigation package is available for residential developments beyond 400m from the SPA which can be considered at appropriate assessment stage, when the detail of the Plan is known. For non-residential developments within the 400m zone, impacts will need to be designed out.</b>
<b>A8 – Housing mix, Type and Tenure</b>	<b>No</b>	The proposed policy would regulate the provision of affordable housing and the type, size and tenure of new homes. This policy in itself would not lead to the provision of new housing sites. The policy generally does not result in a pathway of impact to Natura 2000 sites for any of the identified threats and pressures.	<b>None</b>
<b>A9 – Existing &amp; New Local Community Assets</b>	<b>Yes</b>	A retention policy designed to protect community facilities would generally not be considered to lead to likely significant effects as it preserves the status quo. A policy that seeks new opportunities for and improvements to community facilities could result in new development that would be capable of having an impact through land use change and by increasing access to Natura 2000 sites. The proximity of the NA to Natura 2000 sites means that any footfall brought about by the	<b>The potential creation of new community assets should be undertaken with the proximity of Natura 2000 sites in mind, and in a way which avoids impact to the SPA and SAC.</b>

		introduction of new sites could have a harmful impact on the sites.	
<b>A10 – Green and Blue Infrastructure</b>	<b>No</b>	Policies designed to protect the natural and/or built environment are generally not considered to have significant or adverse effects as they do not result in pathways of impact to Natura 2000 sites for any of the identified threats and pressures.	<b>None</b>
<b>A11 – Local Green Spaces</b>	<b>Yes</b>	<p>A retention policy designed to protect local green spaces would generally not be considered to lead to likely significant effects as it preserves the status quo. A policy that seeks new opportunities for and improvements to local green spaces could result in enhanced footfall to these sites, which could be impactful to nearby natura 2000 sites.</p> <p>A policy that increases access to the Ash Ranges would create adverse impacts on the Thames Basin heaths SPA.</p>	<b>The creation of new or enhancements to existing local green spaces should be executed with the proximity of Natura 2000 sites in mind, and in a way which avoids impacts to the SPA.</b>
<b>A12 – Thames Basin Heath SPA</b>	<b>No</b>	Policies designed to protect the natural and/or built environment are generally not considered to have significant or adverse effects as they do not result in pathways of impact to Natura 2000 sites for any of the identified threats and pressures.	<b>None</b>
<b>A13 – Active Travel</b>	<b>Yes</b>	There is potential for such a policy to influence land use in a way that could have environmental effects e.g. by identifying land for new transport links or creation of bus stops. Enhancements to road infrastructure, as well as public transport could increase visitor footfall, which could be impactful to nearby Natura 2000 sites.	<b>The creation of new or enhancements to existing local transport infrastructure should be undertaken with the proximity of Natura 2000 sites in mind, and in a way which avoids impacts to the SPA.</b>

## **HRA Screening Conclusions**

- 4.29 Based on the screening of proposals above, it is concluded that the NP could lead to likely significant effects on European sites.
- 4.30 If this remains the case for the drafted plan, policies that are screened in will need to be subject to Appropriate Assessment. It should be noted that for adverse effects arising from increased recreational pressure which stem from the delivery of new homes beyond 400m from the SPA, an established package of mitigation measures (SANG and SAMM) is available.

## **5. SEA screening**

### **SEA Screening Methodology**

- 5.1 The screening process is based upon consideration of standard criteria to determine whether the plan or programme (in this case, the NP) is likely to have “significant environmental effects” and therefore require a full SEA Environmental Report. Should it be determined by the local authority and consultation bodies that a full SEA does need to be undertaken, the Council will need to undertake the Scoping stage of SEA.
- 5.2 To establish whether a plan or programme requires SEA, a screening assessment is required against a series of criteria set out in the SEA Directive. Figure 1 sets out the screening process and how a plan should be assessed against the SEA Directive criteria.

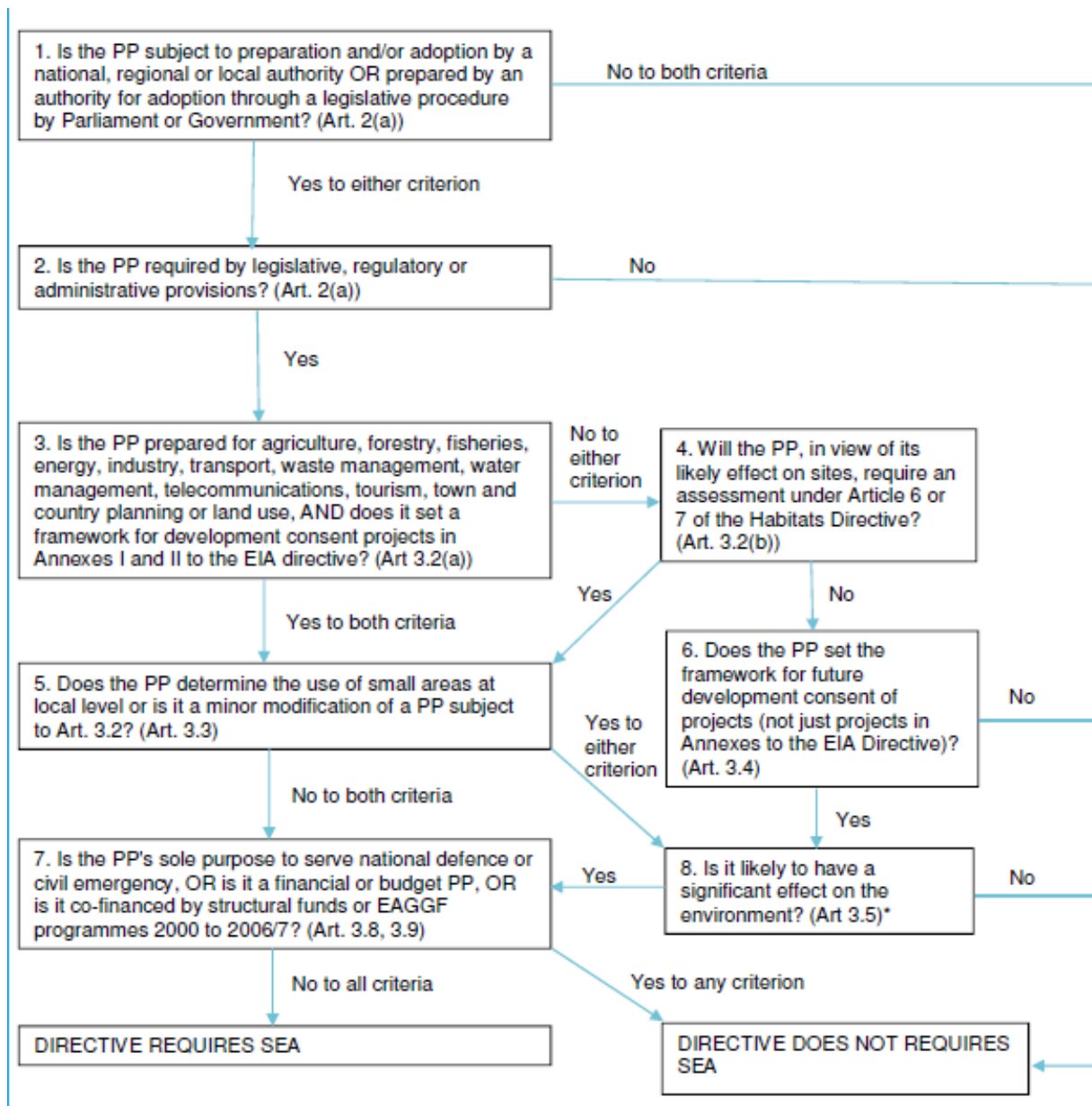


Figure 1 Application of the SEA Directive to plans and programmes (from "A Practical Guide to the Strategic Environmental Assessment Directive", ODPM, 2005).

5.3 Assessing the significance of the environmental effects that this proposal will have depends on the provisions within it. The criteria for assessing significance are referred to in Article 3.5 and set out within Annex II of the SEA Directive and is presented in Figure 2 .

1. The characteristics of plans and programmes, having regard, in particular, to
  - The degree to which the plan or programme sets a framework for projects and other activities, either with regards to location, nature, size and operating conditions or by allocating resources;
  - The degree to which the plan or programme influences other plans and 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)

2. 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.

*Figure 2 Criteria for assessing significance*

5.4 The SEA screening assessment is therefore split into two parts. Part 1 runs the proposal through the questions outlined in Figure 1 and includes commentary of whether the need for SEA is triggered. Part 2 assess the proposal across 8 stages to establish whether there are likely significant effects. The screening opinion takes a 'precautionary approach' and when it is unclear as to how the Directive may be applied it is assumed that there are possible likely significant effects. An assessment of the characteristics of the proposal against these criteria is set out in Table 6 and Table 7 of this report.

## Part 1 – Application of the Directive to the SPD

Table 6 Establishing the need for SEA by following the flowchart in Figure 1

	Stage	Yes/No	Justification
1.	Is the PP (plan or programme) subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Art. 2(a))	<b>Yes</b> (proceed to Q2)	The NP will be adopted by Guildford Borough Council and will be a material consideration in planning decisions.
2.	Is the PP required by legislative, regulatory or administrative provisions? (Art. 2(a))	<b>Yes</b> (Yes when adopted so proceed to Q3)	NPs are optional; there is no legislative or regulatory requirement to prepare them. However once adopted they become part of the development plan and must be used in planning decisions.
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, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive? (Art 3.2(a))	<b>Yes</b> Yes to both criteria (proceed to Q5)	The NP when adopted would become policy, as part of the development plan. It would potentially set out a framework for new development, and will contain policies with regards to transport, tourism, and land use.
4.	Will the PP, in view of its likely effects on sites require an assessment under Article 6 or 7 of the Habitats Directive? (Art. 3.2(b))	<b>N/A</b>	The proposed policies for the NP have themselves been subject to Habitats Regulations Assessment. An HRA screening is provided in this document which finds that the NP will lead to likely significant effects under the Habitats Regulations.
5.	Does the PP determine the use of small areas at local level, OR is it a minor modification of a PP subject to Art. 3.2? (Art. 3.3)	<b>No</b>	The PP is not limited to determining the use of small areas at local level and is not a minor modification of a PP subject.
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>Yes</b>	The NP provides further policy to accompany policy in the development plan, and provides a framework for development projects.
7.	Is the PP's sole purpose to serve the 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>No</b>	Not applicable.

8.	Is it likely to have a significant effect on the environment? (Art. 3.5)	<b>Yes</b>	<p>The purpose of the NP is to provide further policy for Guildford’s development plan. The NA contains significant environmental and historic assets. The plan could propose development which is capable of having an impact on those assets. Additionally, the HRA screening has found likely significant effects on Natura 2000 sites cannot be ruled out.</p> <p><b>Therefore, the NP could have significant effects on the environment.</b></p>
			<b>The NP is subject to SEA.</b>

## Part 2 – Likely significant effects on the environment

5.5 Criteria for determining the likely significance of effects referred to in Article 3(5) of Directive 2001/42/EC are set out below, together with a commentary on whether the SPD would trigger the need for a full assessment.

*Table 7 Assessing Likely Significant Effects using the criteria in Figure 2*

SEA Directive Criteria	Yes/No	Justification
1. The Characteristics of Plans and Programmes, having regard, in particular, to: a) The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources	Yes	The NP as described in the proposal will set out a planning policy framework which will be used to influence the outcome of future planning applications, consistent with the needs and expressed opinions of residents. It will also include site policies that allocate specific land parcels for small-scale development and will therefore be instrumental in considering planning applications for the allocated sites.
b) The degree to which the plan or programme influences other plans and programmes including those in a hierarchy	Yes	<p>In order to meet the ‘basic conditions’ set by legislation and tested at examination, the NPs policies must be in general conformity with the strategic policies in the Local Plan. Additionally, some planning matters are beyond the remit of the NP, including County matters which cover waste, minerals and highways. However, outside of these strategic policies and county matters, the NP is free to shape and replace development plan policy. It may also exert an influence on future Local Plan strategic policy, and it will restrict future Local Plans from duplicating policy for the non-strategic matters it covers. It therefore influences the future development plan.</p> <p>As the NP creates development plan policy, it will influence development projects within the NA boundary.</p>

<p>c) The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development</p>	<p>Yes</p>	<p>The NP will be subject to examination including being tested against the 'Basic Conditions' set by legislation. One of these basic conditions is that the NP must contribute to the achievement of sustainable development. The resulting plan will therefore promote sustainable development.</p> <p>The NP will also need to be in general conformity with strategic policies in the Local Plan which includes policies protecting and restoring/enhancing the natural and built environment and heritage assets. The integration of environmental considerations is therefore relevant to the NP. The NP proposal includes policies intended to support the environment and sustainable development through policies that safeguard the natural environment, address transport and improve the sustainability of new development which could result in significant positive environmental benefits.</p>
<p>d) Environmental problems relevant to the plan or programme</p>	<p>Yes</p>	<p>The UK suffers from severe biodiversity degradation and the government has a stated national ambition to halt the decline and bring about restoration, including through the planning system. As a Development Plan Document, the NP is capable of influencing the achievement of related national and local targets.</p> <p><u>European sites</u></p> <p>There are SPA and SAC sites located within the NA. The remainder of the NA falls within the 400m and 400m-5km SPA zones where residential developments can impact the SPA. Strategic policy is in place which requires new development to mitigate this risk. The policies proposed by the NP are considered to potentially have an impact (see HRA in Section 4).</p> <p><u>National and local sites and designations</u></p> <p>There are seven SNClS with more adjoining the boundary, two SSSIs, and two Local Nature Reserves within the parish boundary. These designated sites are protected by national and local planning policy. The relevant protective policies in the Local Plan are strategic, so the NP must be in general conformity with them. The NP proposal includes policies to safeguard the natural environment and biodiversity.</p> <p>However, the NP has the potential to allocate sites for development. The locations of these sites are not known at this stage, though it should be noted that much of the NA is covered by protective designations, and so it is possible that site allocations could harm protected assets. The NP will be required to take account of these sensitive local sites in its site allocation policies, but it must be</p>



		<p>acknowledged that site allocations, unless inclusive of appropriate avoidance and mitigation, could lead to significant effects upon designated sites and sites protected habitats.</p> <p><u>Heritage assets</u></p> <p>The NA contains sensitive heritage assets (see Heritage and character in section 3). The location of potential site allocations is not known at this stage, however there is potential for these sites to fall within Conservation Areas, or within the vicinity of listed buildings.</p> <p>Conservation Areas and listed buildings are protected by national legislation and by national and local planning policies. The relevant protective policies in the Local Plan are strategic, so the NP must be in general conformity with them.</p> <p>However, site allocations, if drafted without appropriate avoidance or mitigation clauses and located within the close vicinity of heritage assets, could potentially lead to significant effects on these protected areas and assets.</p>
e) 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)	No	The NP does not intend to address European Community environmental legislation directly e.g. by covering waste management or water protection, except potentially as a facet of development standards. Conformity with relevant environmental legal requirements will be tested through the examination.
2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to: a) The probability, duration, frequency and reversibility of the effects	Yes	The NP could have limited, short-term effects resulting from activity associated with the development of allocated sites. The effects from land use changes and developments that may occur as a result of the NP will operate over the long-term.
b) The cumulative nature of the effects	Yes	<p>Cumulative effects could result depending on the number, size and location of any development sites that result from the NP.</p> <p>The NP may include protective policies that conserve and enhance the natural and built environment. These policies could have a cumulative positive environmental effect alongside national and borough policy.</p>
c) The transboundary nature of the effects	No	No significant transboundary effects from the proposal are anticipated. The NA itself covers the limited area of a single parish.
d) The risks to human health or the environment (e.g. due to accidents)	No	The NP is not proposed to include any policies that would lead to development that causes significant risks to human health or the environment.

e) The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)	Yes	Given the small-scale nature of the proposals, the magnitude and spatial extent of most effects will be limited to the geographical area of the NA and likely to the immediate vicinity of the site allocations. Negative impacts on the landscape, which could operate at a wider scale, are possible due to the potential to allocate sites or enable sites through supportive policies. As the details of the proposals are not yet known, it is not possible to conclude that such affects will not occur.
f) The value and vulnerability of the area likely to be affected due to: (i) special natural characteristics or cultural heritage, (ii) exceeded environmental quality standards or limit values, (iii) intensive land-use,	Yes	The NA contains sensitive heritage assets: Areas of High Archaeological Potential, County Sites of Archaeological Importance, Listed Buildings, Locally Listed Buildings and a Conservation Area. The NA also contains special natural characteristics: SSSIs, SNCIs, Areas of Ancient Woodland, and Local Nature Reserves. Depending on proximity and the detail of sites, site allocations could potentially have significant environmental effects on sensitive cultural, heritage and natural assets. The NP may propose small-scale developments. Due to their scale these are not considered to be significant in terms of environmental quality standards or environmental limits. Site allocations are expected to make the best and most efficient use of land – not to intensively use the land for development. Given the proposed policies to protect local character, intensive land use should not occur.
g) The effects on areas or landscapes which have a recognised national, Community or international protection status.	Yes	The NA contains rural land, including part of the Ash Ranges. There is potential for site allocations to have an environmental impact on the landscape, whether individually or cumulatively, depending on the number, size, location and specific details of site policies.
Part 2 Overall Conclusion		The NP could have significant environmental effects.

### SEA screening conclusions

- 5.6 Applying the guidance set out in “A Practical Guide to the Strategic Environmental Assessment Directive”, the assessment concluded that the proposal could lead to likely significant effects on the environment and accordingly does require a SEA environmental report.
- 5.7 On this basis, Guildford Borough Council concludes that the NP does require a full SEA to be undertaken.

## **6. HRA and SEA Screening Consultation**

6.1 Guildford Borough Council is required to consult with Historic England, the Environment Agency and Natural England on all SEA screening opinions, and with Natural England on all HRA screening opinions, before formally determining whether a strategic environmental assessment and/or HRA appropriate assessment is needed. A draft of this document was sent to the three bodies for consideration in November 2024, and they were asked to respond by the 8th January 2025. Two of the three bodies contacted agreed with the report's conclusions. One body did not respond.

## **7. HRA and SEA Determination**

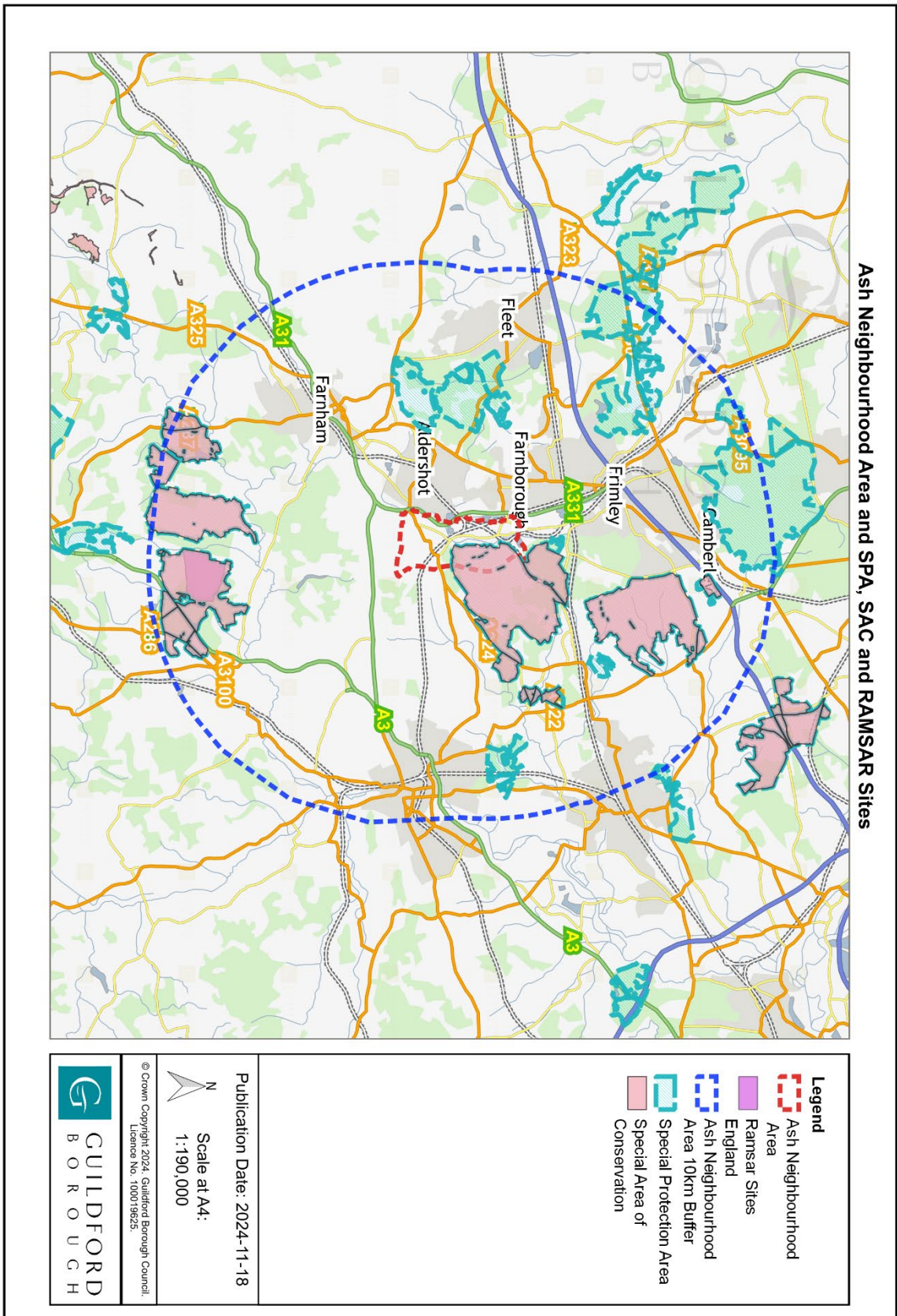
7.1 Under Regulation 11 of the SEA regulations, the Council has determined that the NP may result in likely significant environmental effects under the SEA regulations and result in likely significant effects on a European site under the Habitats regulations. The reasons for making these determinations are set out in this report.

7.2 This determination was made on the 14th January 2025.

## **8. Background Documents**

- The Conservation of Habitats and Species Regulations 2017. Available at: <http://www.legislation.gov.uk/uksi/2017/1012/contents/made>.
- Designated Sites Natural England. Available at: <https://designatedsites.naturalengland.org.uk/SiteSearch.aspx>
- The Environmental Assessment of Plans and Programmes Regulations 2004. Available at: <http://www.legislation.gov.uk/uksi/2004/1633/contents/made>
- Tyldesley and Associates - prepared for Natural England Guidance - The Assessment of Regional Spatial Strategies and Sub Regional Strategies under the Provisions of the Habitats Regulations 2006.
- Habitats regulations assessments: protecting a European site guidance. Available at: <https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site>

# Appendix 1: Map of European Sites



## **Appendix 2: Draft Scoping Report and Action Plan**