

Puttenham Neighbourhood Plan 2016 – 2033

Strategic Environmental Assessment Screening and Habitat Regulations Assessment Report

April 2020

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1. Introduction

1.1 Background

The Localism Act (2011) introduced new powers to enable local communities to guide and shape development through the production of Neighbourhood Plans, with further accompanying detail on how to do this set out in The Neighbourhood Planning (General) Regulations 2012 (as amended).

The purpose of the Puttenham Neighbourhood Plan is to provide locally derived and agreed planning policy which will be used when making planning decisions within the designated Puttenham Neighbourhood Area.

Strategic Environmental Assessment (SEA) is required under European Directive 2001/42/EC (the SEA Directive) for all plans which may have a significant effect on the environment. This requirement has been incorporated into UK law through The Environmental Assessment of Plans and Programmes Regulations 2004. For neighbourhood plans, this particularly relates to plans which designate sites for development. The purpose of the SEA is to provide a high level of protection of the environment and to integrate considerations of the environment into the preparation and adoption of plans with a view to promoting sustainable development.

To ascertain whether an SEA 'Environmental Assessment' is required, a screening exercise is undertaken. The screening looks at the draft policies and proposals in a neighbourhood plan to determine whether a significant environmental effect is likely. The criteria for this screening are set out in the relevant legislation¹.

Alongside this, a screening exercise to determine whether or not the contents of the Puttenham Neighbourhood Plan require a Habitats Regulations Assessment (HRA) 'Appropriate Assessment' in accordance with European Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora, i.e. the 'Habitats Directive' and the associated Conservation of Habitats and Species Regulations 2017 (otherwise known as the 'Habitats Regulations') to determine.

The legislative background, set out in Section 2, outlines the regulations that stipulate the need for this screening exercise. Sections 3 and 4 provide screening assessment of the Puttenham Neighbourhood Plan which will be used to determine if there are likely to be any significant environmental effects and a requirement for a full SEA Environmental Assessment and HRA Appropriate Assessment.

1.2 The aims of this report

The primary aims of this Screening Report are to:

1. Identify whether the Puttenham Neighbourhood Plan requires a SEA Environmental Assessment by appraising the potential significant environmental effects that may arise from the Neighbourhood Plan.
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

¹ European Directive 2001/42/EC (the SEA Directive) and Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations).

Protection Areas (SPAs) and also Ramsar sites) within and around the neighbourhood area of Puttenham as part of a Habitats Regulations Assessment (HRA).

These aims are closely interlinked, with the HRA providing supporting evidence for the conclusions reached within the SEA.

This report details whether there is a need for the Puttenham Neighbourhood Plan to be accompanied by an SEA Environmental Assessment or HRA Appropriate Assessment. Given that the HRA feeds into the conclusions of the SEA; the HRA is first provided in Section 3, with the SEA detailed in Section 4.

1.3 The Puttenham Neighbourhood Plan

The Vision and objectives of the Puttenham Neighbourhood Plan are outlined below:

Vision:

“Our vision is to maintain Puttenham Parish as a thriving vibrant community of rural character and identity, preserving its heritage assets, listed buildings and conservation area so that it will remain a visually attractive, independent settlement, set in unspoilt, tranquil and accessible countryside, providing an excellent quality of life for residents, visitors and those who work in the Parish”.

Objectives of the Plan

Social

1. To ensure that new housing development in the Parish is affordable and meets the needs of the local community
2. To improve the health and vitality of the parish and ensure that the needs of residents and visitors are met through retaining, supporting and improving the parish’s valued local community facilities, services and assets.
3. To reduce traffic flows through the village, improve highway and pedestrian safety and parking pressure in the parish and encourage sustainable forms of transport

Environment

4. To ensure that future development is appropriate and proportionate to the scale and rural character of the parish.
5. To preserve and enhance the Parish’s unique and valued rural character, independence and landscape setting within the Surrey Hills AONB.
6. To preserve and enhance the parish’s valued natural environment, habitats and biodiversity
7. To ensure new development preserves and enhances the parish's valued built environment, in particular its listed buildings, conservation area and other non-designated heritage assets.

Economic

8. To support the parish’s local, rural and tourism economy

Plan boundary

The Puttenham Neighbourhood Plan will influence planning decisions within the designated Puttenham Neighbourhood Area (the neighbourhood area), which has the same boundary as Puttenham Parish. Puttenham is a rural parish set in the Surrey Hills Area of Outstanding Natural Beauty. Puttenham village is the parish's main settlement which is located approximately 5km to the west of Guildford, to the east of Farnham and to the north of Godalming. The village is set below the southern slopes of the Hog's Back which is an important feature in the landscape and forms a distinctive backdrop to the village. From Puttenham Common, south of the village, the Wealden landscape stretches into the distance with extensive oak, pine and birch woodland on the lower greensand. The meandering River Wey forms the southern boundary of the parish.

Heritage

Puttenham village contains numerous historic buildings, in particular along The Street, many of which are listed. The historic core of the village is designated as a Conservation Area.

There are 33 Listed Buildings in the neighbourhood area including two Grade II* Listed Buildings, these being Puttenham Priory and St Johns the Baptist Church. The majority of listed buildings lie within the historic core of Puttenham village, but 13 Grade II Listed Buildings lie outside of the Conservation Area in the rural parts of the neighbourhood area.

There are 10 Areas of High Archaeological Potential in the neighbourhood area, notably the historic core of the village. There are also a number of other AHAPs on the edge of the neighbourhood area.

There are two Scheduled Ancient Monuments in the neighbourhood area (Hillbury Hillfort at Puttenham Common and Frowsbury Mound located just of the B3000).

Natural Environment

Puttenham is a rural parish set in the Surrey Hills Area of Outstanding Natural Beauty. The entire neighbourhood area is also designated as an Area of Great Landscape Value (AGLV) and is also entirely within the Green Belt.

There are no internationally designated biodiversity sites within the neighbourhood area. However, the neighbourhood area is within a 'zone of influence' of the Thames Basin Heath Special Protection Area (SPA), which is an area of heathland identified as an important habitat for various species of birds.

The "zone of influence" is between 400m and 5km linear distance from the SPA boundary, and within this zone new residential development is assumed to have an impact on the SPA through increased recreational pressure. As a result, new homes within this zone are restricted and subject to impact assessments.

The upper half of the neighbourhood area (including the village of Puttenham) lies within the 400m and 5km zone and the remainder lies within the 5-7km buffer zone. Within the 5-7km buffer zone, developments of over 50 dwellings may have an impact on the SPA through increased recreational pressure, established on a case-by-case basis.

The neighbourhood area does contain other sites recognised for their biodiversity value including Puttenham and Crooksbury Commons Site of Special Scientific Interest (SSSI) which is an area of heathland supporting a variety of flora and fauna as well as numerous Sites of Nature Conservation Interest (SNCIs) which are of local importance for their nature conservation value

including William's Copse and Stoney Hill, Puttenham Common Woods, Lower Puttenham Common and Halsemoor Wood and Broomfield Wood and Gatwick Alder Bed.

There are also two further sites on the edge of the neighbourhood area (Barfield Copse and Inwood Meadow).

The neighbourhood area also has significant amounts of Ancient and Semi-Natural Woodland, primarily to the east and south of Puttenham village in the north of the neighbourhood area.

There are various areas of priority habitats identified in Natural England's Priority Habitats Inventory. This includes areas of Lowland Heathland and Lowland Fens at Puttenham Common as well as large swathes of Deciduous Woodland across the neighbourhood area. There are also large patches of Woodpasture and Parkland BAP.

2. Legislative background

2.1 Habitat Regulations Assessment

The Conservation of Habitats and Species Regulations 2017 transpose the Directive on Conservation of Natural Habitats and of Wild Fauna and Flora 92/43/EEC (the Habitats Directive) into UK law and require Habitats Regulations Assessment (HRA) to be undertaken for any plan or project likely to have a significant effect upon a European protected site.

The Conservation of Habitats and Species Regulations 2017 consolidate the Conservation of Habitats and Species Regulations 2010 with subsequent amendments. The 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.

It is a requirement of Article 102 of the Conservation of Habitats and Species Regulations 2017 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)".

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).

In addition to SPAs and SACs, 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.

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

Deciding whether effects are “significant”

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 which 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 to be “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.

The Neighbourhood Planning (General) Regulations 2012 require a submitted neighbourhood plan to include a statement explaining how the proposed Neighbourhood Plan meets the basic conditions set out in paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990. One of the basic conditions requires Neighbourhood Plans to be compatible with EU obligations and to demonstrate that it is not likely to have a significant effect on a European Site. If likely significant effects are identified, the HRA process should proceed to a second stage which is called an ‘Appropriate Assessment’ at which point mitigation effects are considered.

An Appropriate Assessment will consider the implications for the European Site in view of the conservation objectives (generally to restore or maintain the features which led to the designation of the site), and consider whether the plan could affect the integrity of the site. More detailed mitigation measures may be considered at this stage but as stated above a plan should only be agreed once the competent authority has established that the plan will not adversely affect the integrity of the European Sites.

2.2 Strategic Environmental Assessment

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

The objective of the SEA Directive (2001/42/EC) is set out in Article 1 therein, which states:

‘The objective of this Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development, by ensuring that, in accordance with this Directive, an environmental assessment is carried out of certain plans and programmes which are likely to have significant effects on the environment.’

Whether a neighbourhood plan requires a strategic environmental assessment, and (if so) the level of detail needed, will depend on what is proposed in the draft neighbourhood plan. A strategic environmental assessment may be required, for example where:

- a neighbourhood plan allocates sites for development;
- the neighbourhood plan area contains sensitive natural or heritage assets that may be affected by the proposals in the plan; and
- 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 for the area.

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.

3. Habitat Regulations Assessment Screening

3.1 HRA 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 below:

HRA Task 1 – Screening

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.

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

If no likely significant effects are determined, the project or plan can proceed. If any likely significant effects are identified, Task 2 commences.

HRA Task 2 – Appropriate Assessment

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.

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. If an adverse impact is identified, task 3 is commenced.

HRA Task 3 – Mitigation and Alternatives

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.

However, in exceptional circumstances, if there is an 'imperative reason of overriding public interest' (IROPI) 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 be put in place to offset negative impacts.

3.2 HRA Task 1 Screening - methodology

Screening is undertaken to identify the likely impacts of the Puttenham 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, 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.

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).

HRA Screening 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 by sending them this draft Screening report.

Limitations

No limitations were encountered.

3.3 European Sites

Each site of European importance has its own intrinsic qualities, besides the habitats or species for which it has been designated, that enables the site to support the ecosystems that it does. An important aspect of this is that the ecological integrity of each site can be vulnerable to change from natural and human induced activities in the surrounding environment (pressures and threats). For example, sites can be affected by land use plans in a number of different ways, including the direct land take of new development, the type of use the land will be put to (for example, an extractive or noise-emitting use), the pollution a development generates and the resources used (during construction and operation for instance).

An intrinsic quality of any European site is its functionality at the landscape ecology scale. This refers to how the site interacts with the zone of influence of its immediate surroundings, as well as the wider area. This is particularly the case where there is potential for developments resulting from the plan to generate water or air-borne pollutants, use water resources or otherwise affect water levels. Adverse effects may also occur via impacts to mobile species occurring outside of a designated site but which are qualifying features of the site. For example, there may be effects on protected birds that use land outside the designated site for foraging, feeding, roosting or other activities.

3.3.1 European Sites in and around Puttenham 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 Puttenham 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 SPAs, SACs or Ramsar sites located within the neighbourhood area.

There are three SPAs within 10km of the neighbourhood area. These sites are listed in **Table 3.1** below, and shown on **Figure 3.1**. The neighbourhood area falls partially within 5km of the Thames Basin Heath SPA.

Details of European Sites within 10km buffer around the neighbourhood area are presented in **Table 3.2**.

Table 3.1: European Sites within and adjacent to the Puttenham Neighbourhood Area

Designation	Site	Distance at closest point
SPA	Thursley, Hankley and Frensham Commons (Wealden Heaths Phase 1)	1.6km
SPA	Thames Basin Heaths	3.7 km
SPA	Wealden Heaths Phase 2	6.01km

Figure 3.1: Location of European Sites within Puttenham Neighbourhood Area and a 10km buffer

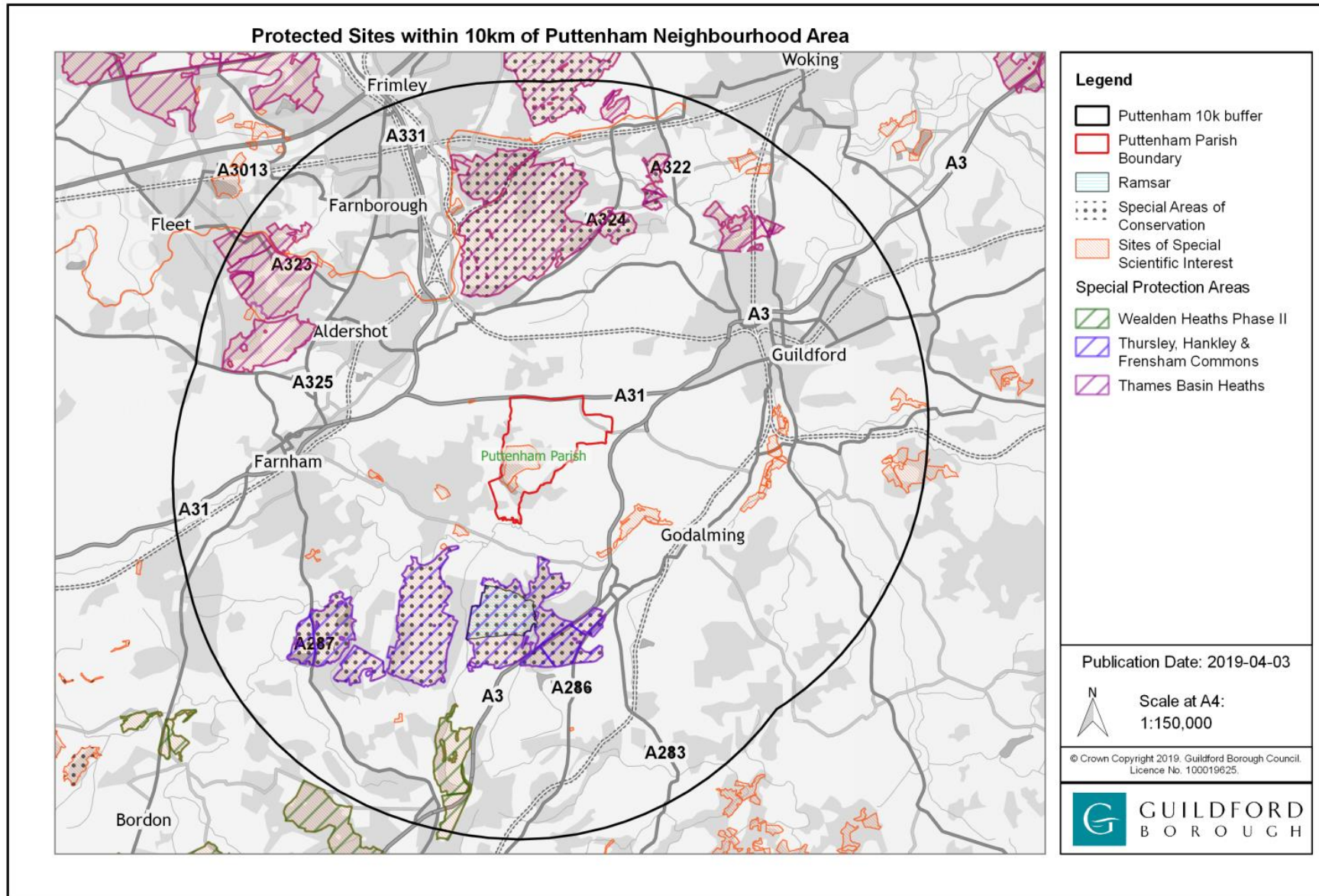


Table 3.2: Details of European Sites within 10km buffer around Puttenham Neighbourhood Area (Information from JNCC, 2018; Natural England, 2018)

European Site	Qualifying Features and Conservation Objectives
<p>Thursley, Hankley and Frensham Commons (Wealden Heaths Phase 1) SPA</p>	<p>Qualifying Features:</p> <p>During the breeding season:</p> <ul style="list-style-type: none"> • Dartford Warbler (<i>Sylvia undata</i>), 20 pairs (which represented 4% of the British breeding population in 1984). • Nightjar (<i>Caprimulgus europaeus</i>), 20 pairs (which represented 1% of the British breeding population in 1984). • Woodlark (<i>Lullula arborea</i>), 27 pairs (which represented 12% of the British breeding population in 1984). <p>Conservation objectives:</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"> • The extent and distribution of the habitats of the qualifying features; • The structure and function of the habitats of the qualifying features; • The supporting processes on which the habitats of the qualifying features rely; • The population of each of the qualifying features; and • The distribution of the qualifying features within the site.
<p>Thames Basin Heaths SPA</p>	<p>Qualifying Features:</p> <p>During the breeding season:</p> <ul style="list-style-type: none"> • Dartford Warbler <i>Sylvia undata</i>, 445 pairs representing at least 27.8% of the breeding population in Great Britain (Counts as at 1999) • Nightjar <i>Caprimulgus europaeus</i>, 264 pairs representing at least 7.8% of the breeding population in Great Britain (Count mean (1998-99)) • Woodlark <i>Lullula arborea</i>, 149 pairs representing at least 9.9% of the breeding population in Great Britain (Count as at 1997) <p>Conservation objectives:</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"> • The extent and distribution of the habitats of the qualifying features; • The structure and function of the habitats of the qualifying features; • The supporting processes on which the habitats of the qualifying features rely; • The population of each of the qualifying features; and • The distribution of the qualifying features within the site.
<p>Wealden Heaths Phase 2</p>	<p>Qualifying Features:</p> <p>During the breeding season:</p>

European Site	Qualifying Features and Conservation Objectives
	<ul style="list-style-type: none"> • Dartford Warbler <i>Sylvia undata</i>, 16 pairs (5 year peak mean 1989-1993) which represented 1.7% of the GB population. • Nightjar <i>Caprimulgus europaeus</i>, 43 pairs (5 year peak mean 1989-1993) which represented 1.4% of the GB population. • Woodlark <i>Lullula arborea</i>, 15 pairs (5 year peak mean 1989-1993) which represented 4.3% of the GB population. <p>Conservation objectives:</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"> • The extent and distribution of the habitats of the qualifying features; • The structure and function of the habitats of the qualifying features; • The supporting processes on which the habitats of the qualifying features rely; • The population of each of the qualifying features; and • The distribution of the qualifying features within the site.

3.3.2 Potential impacts on the 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 the 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.

Qualifying Features and Sensitivity to Hazards

Table 3.3 below, shows the qualifying features of the European sites within the 10km buffer around the neighbourhood area and identifies the hazards to which they are potentially sensitive.

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 3.3: Threats and pressures for each European site identified as potentially being affected by Puttenham NP

Threats and pressures	Thames Basin Heaths SPA	Thursley, Hankley and Frensham Commons SPA	Wealden Heaths Phase 2 SPA
Air pollution	√ ^{ab} All qualifying features	√ ^{ab} All qualifying features	-
Biocenotic evolution, succession	√ ^a	√ ^a	-
Forestry and woodland/plantation management	√ ^{ab*} All qualifying features	√ ^b All qualifying features	-
Public access and sports/recreational activities	√ ^{ab} All qualifying features	√ ^{ab} All qualifying features	√ ^{ab} All qualifying features
Hydrological changes	√ ^b All qualifying features	√ ^b All qualifying features	√ ^a
Grazing regime	√ ^b All qualifying features	√ ^b All qualifying features	-
Wildlife/arson	√ ^b All qualifying features	√ ^b All qualifying features	√ ^b All qualifying features
Habitat fragmentation	√ ^b All qualifying features	√ ^b All qualifying features	-
Military activities	√ ^b All qualifying features	√ ^b All qualifying features	√ ^b All qualifying features

a - Indicates that this is highlighted as a threat / pressure in the relevant Natura 2000 Data Form

b - Indicates that this is highlighted as a threat in the relevant Site Improvement Plan

* - Indicates that this threat / pressure is also identified as a potentially positive impact on the relevant Natura 2000 Data Form

3.4 Other Relevant Plan and Projects 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 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 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 3.4 below 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 Puttenham Neighbourhood Plan.

Table 3.4: Other Plans and Projects

Plan/ Projects	Potential in-combination effects
<p>National Planning Policy Framework (NPPF) (June, 2019)</p>	<p>The NPPF sets out national planning policy to be taken into account by councils when preparing new local plans 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. It 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. 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>Guildford Local Plan</p>	<p>The Guildford Local Plan consists of the Local Plan: Strategy and Sites 2015-2034 (LPSS) and the remaining policies of the Guildford Local Plan 2003.</p> <p>Once the Puttenham Neighbourhood Plan has been adopted or ‘made’ it will form part of the Development Plan alongside the Local Plan for Guildford. The Puttenham Neighbourhood Plan must be in general conformity with the Local Plan’s strategic policies in order to be adopted. The LPSS sets strategic policy for development of the borough. It does not allocate a housing target for the village of Puttenham, therefore no in-combination effects are likely to occur.</p> <p>The LPSS has undergone a Habitats Regulations Assessment (AECOM, 2018). Additionally, the Plan contains a policy (P5) specifically related to the Thames Basin Heath SPA that 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.</p>

Plan/ Projects	Potential in-combination effects
Thames Basin Heaths Special Protection Area Avoidance Strategy 2017 Supplementary Planning Document (Guildford Borough Council, 2017)	<p>This document was adopted in July 2017 and replaces the earlier Thames Basin Heaths SPA Avoidance Strategy 2009-2016. Natural England has recognised that residential development across the South East region could have potentially adverse impact 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 under advice from 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 Puttenham Neighbourhood Plan may result in adverse impacts on the SPA and this is taken into account throughout this HRA.</p> <p>Although the Regional Spatial Strategy for the South East has now been partially revoked under the 2011 Localism Act, policy NRM6 relating to the Thames Basin Heaths SPA was retained and remains part of the Development Plan. 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. The Puttenham Neighbourhood Plan will have to ensure that its policies are consistent with the requirements of policy NRM6.</p>

3.5 Screening Assessment

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. If no adverse impact is determined, the project or plan can proceed. If an adverse impact is identified, Task 2 is commenced.

This section considers the objectives identified in the Puttenham 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 3.5**.

Taking into account the location of the European Sites in relation to the neighbourhood area and the identified potential hazards associated with the objectives and policies 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 3.5**.

Puttenham Neighbourhood Plan HRA screening assessment

Table 3.5: Screening assessment of the Puttenham Neighbourhood Plan objectives and policies on European Sites

Policies	Policy Summary	Assessment of likelihood of significant effects	Significant effects
Land Use Policies	<p>P-GP1 - Puttenham Settlement Boundary and Development Principles (1) Sustainable development within the Puttenham Settlement Boundary, as defined in the Guildford Borough Local Plan (or any replacement) will be permitted subject to compliance with national Green Belt policy and other relevant Neighbourhood Plan and Local Plan policies. (2) In addition to the above requirements, development proposals located outside of the Settlement Boundary will be required to demonstrate that they conserve the rural landscape and comply with the relevant policies of the Guildford Local Plan (or any replacement). (3) Development proposals within the Surrey Hills Area of Outstanding Natural Beauty (AONB) will be assessed against the provisions of the Surrey Hills AONB Management Plan and demonstrate how they will conserve and enhance the AONB. Development proposals in close proximity to the AONB will be required to demonstrate that they will not result in the loss of important public views to and from the AONB.</p>	<p>This policy would not be likely to create any pathways of impact onto European sites. It is unlikely to lead to likely significant effects on the SPA through increased recreational pressure. This policy is unlikely to have HRA implications.</p>	None*
Transport and Infrastructure	<p>P-TI1 - Sustainable Transport New development shall maximise the use of sustainable forms of transport, including through the following: (a) New development providing a net increase in residential dwellings shall contribute towards the provision of sustainable forms of transport. (b) New development will be required, where feasible, to deliver publicly accessible footpaths and/or cycleways within the site. Wherever possible, and subject to the agreement of the local highways authority, these should be linked to existing footpaths and cycleways near to the site to enhance safe linkages across the village and sensitively designed to minimise the impact of vehicles on the streetscene.</p>	<p>This policy would not be likely to create any pathways of impact onto European sites. It is unlikely to lead to likely significant effects on the SPA through increased recreational pressure. This policy is unlikely to have HRA implications.</p>	None*

Policies	Policy Summary	Assessment of likelihood of significant effects	Significant effects
Transport and Infrastructure	<p>P-TI2 – Parking</p> <p>(1) Off-street parking, in accordance with current Surrey County Council parking space dimensions, shall be provided on site to accommodate new development in accordance with the following absolute minimum standards:</p> <p>Studio/1 bedroom unit – 1 space</p> <p>2 bedroom unit – 1.5 spaces (the number of spaces will be rounded up where applicable)</p> <p>3 + bedroom unit – 2 spaces</p> <p>(2) For any new development, where planning permission is required, the loss of off-street parking will not be permitted unless:</p> <p>(a) it can be demonstrated that an equivalent or improved capacity is provided elsewhere; or</p> <p>(b) the existing provision is unsatisfactory; or</p> <p>(c) the need for off street parking capacity has been demonstrably reduced as a result of the implementation of the development proposal and would thus avoid harm to pedestrian and highway safety.</p>	<p>This policy would not be likely to create any pathways of impact onto European sites. It is unlikely to lead to likely significant effects on the SPA through increased recreational pressure. This policy is unlikely to have HRA implications.</p>	<p>None*</p>

Policies	Policy Summary	Assessment of likelihood of significant effects	Significant effects
Transport and Infrastructure	<p>P-TI3 - Car Park Policy The site identified on Map TI3 is allocated for formal car parking provision of approximately 32 no. car parking spaces (including an appropriate number of disabled spaces), subject to the following:</p> <ul style="list-style-type: none"> (a) Provision of associated soft landscaping (b) Ecological enhancements are provided where possible (c) The design is sensitive to its rural setting, including the use of appropriate surfacing (e.g. grasscrete or similar) (d) Preserving the openness and character of the Green Belt (e) Provision of electric vehicle charging points (where feasible) (f) Safe and suitable access arrangements to be agreed by the Local Planning Authority. 	<p>This policy would not be likely to create any pathways of impact onto European sites. It is unlikely to lead to likely significant effects on the SPA through increased recreational pressure. This policy is unlikely to have HRA implications.</p>	None*
Transport and Infrastructure	<p>P-TI4 - Electric Vehicle Charging Points New developments requiring off-street parking shall provide fast charge electric vehicle charging points in line with Surrey County Council parking standards where feasible.</p>	<p>This policy would not be likely to create any pathways of impact onto European sites. It is unlikely to lead to likely significant effects on the SPA through increased recreational pressure. This policy is unlikely to have HRA implications.</p>	None*
Transport and Infrastructure	<p>P-TI5 - Communications Infrastructure (1) All new residential or commercial development within the Neighbourhood Area will be expected to include the necessary infrastructure (where possible) to allow Fibre To The Premises (FTTP). (2) Where planning permission is required, new telecommunication infrastructure shall be permitted where sympathetically designed and camouflaged to avoid harm to the parish's landscape and historic environment. Existing masts, buildings and other structures must be used in the first instance unless robust justification is provided to demonstrate the need for a new site.</p>	<p>This policy would not be likely to create any pathways of impact onto European sites. It is unlikely to lead to likely significant effects on the SPA through increased recreational pressure. This policy is unlikely to have HRA implications.</p>	None*

Policies	Policy Summary	Assessment of likelihood of significant effects	Significant effects
Transport and Infrastructure	<p>P-TI6 – Water and Waste Infrastructure Adequate water and wastewater infrastructure will be required to serve all new residential developments and where appropriate, developments which result in the need for off-site upgrades will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades.</p>	<p>This policy would not be likely to create any pathways of impact onto European sites. It is unlikely to lead to likely significant effects on the SPA through increased recreational pressure. This policy is unlikely to have HRA implications.</p>	None*
Transport and Infrastructure	<p>P-TI7 – Water Efficiency (1) Development proposals must be designed to be water efficient and reduce water consumption. (2) New residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption). Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met. (3) Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits.</p>	<p>This policy would not be likely to create any pathways of impact onto European sites. It is unlikely to lead to likely significant effects on the SPA through increased recreational pressure. This policy is unlikely to have HRA implications.</p>	None*
Housing	<p>P-HP1 - Affordable Housing (1) Development proposals for affordable housing within the Puttenham Settlement Boundary as defined in the Guildford Borough Local Plan (or any replacement), or outside as a rural exception site, will be supported where: (a) the affordable homes will remain low-cost in perpetuity and will be secured for households with a local connection (as defined in the Puttenham and Wanborough Housing Society Scheme of Allocation as seen in the supporting text and, following that, should no tenant be found, the Guildford Borough Housing Allocation Scheme) with Puttenham parish through a Section 106 agreement.</p>	<p>A policy that supports small-scale housing developments within 5km of the SPA is likely to lead to significant effects on the SPA through increased recreational pressure. This policy is likely to require appropriate assessment to assess avoidance and mitigation measures. There is an established approach to</p>	Yes

Policies	Policy Summary	Assessment of likelihood of significant effects	Significant effects
	(b) it is demonstrated that there is a local affordable housing need and that the proposal is appropriate in terms of housing size and tenure, taking into account the latest available evidence including the Puttenham Parish Housing Needs Survey (2014) and/or the Borough Council Strategic Housing Market Assessment.	mitigation and avoidance, which the appropriate assessment will be able to draw upon and it will very likely conclude that the policy will not lead to adverse effects on the integrity of the SPA and thus is compatible with European obligations ² .	
Housing	<p>P-HP2 Thames Basin Heaths All new residential development within the Thames Basin Heaths SPA 5km 'zone of influence' must provide or fund SANGS and a contribution towards SAMM must be made in accordance with Guildford Borough Council's Thames Basin Heaths SPA Avoidance Strategy.</p>	This policy would not be likely to create any pathways of impact onto European sites. It is unlikely to lead to likely significant effects on the SPA through increased recreational pressure. The policy aligns with adopted policy aThis policy is unlikely to have HRA implications.	None*
Affordable Housing Allocations	<p>P-HA1 - Home Farm Barns The Home Farm Barns, as defined on Map HA1 below, is allocated for up to 4 affordable homes and the retention of the camping barns facility (where feasible), subject to the following: (a) The affordable homes will remain low-cost in perpetuity and will be secured for households with a local connection (as defined in Policy HP1)</p>	A policy that supports small-scale housing developments is likely to lead to significant effects on the SPA through increased recreational pressure due to the proposed site falling within the 5km zone of influence of the Thames Basin Heath SPA.	Yes

² The Council's view is that this approach is compatible with the recent People over Wind judgement from the European Court of Justice, notwithstanding paragraph 32 of the Neighbourhood Planning (General) Regulations 2012 (as amended)

Policies	Policy Summary	Assessment of likelihood of significant effects	Significant effects
	<p>(b) The development provides an appropriate mix of unit sizes and tenure dictated by the constraints of the Listed Building and informed by the latest affordable housing needs evidence</p> <p>(c) That any necessary alterations (internal and external) are sensitive to the building, its historic fabric and internal plan form.</p> <p>(d) Full consideration is given to the archaeological potential of the site through an archaeological desk-based assessment</p> <p>(e) Safe and suitable vehicular access is provided off The Street</p> <p>(f) That an appropriate level of off street parking is provided in accordance with policy P-TI2 and P-TI4 (g) Secure, covered cycle parking is provided in accordance with Surrey County Council standards</p> <p>(h) An ecological scheme to be agreed by the LPA ensuring that existing habitats are preserved or enhanced where possible, that any loss of habitat and biodiversity on the site is adequately mitigated and that net ecological gains are provided where possible.</p> <p>(i) SANGs must be provided or funded, and a contribution towards SAMM must be made, in accordance with the Council's Thames Basin Heaths SPA Avoidance Strategy</p>	<p>Although the policy includes requirements for the provision of SANGs and a contribution towards SAMM in accordance with the Council's Thames Basin Heaths SPA Avoidance Strategy, it is deemed a mitigation measure necessary to protect the European site and therefore cannot be considered until HRA Task 3. Therefore, this policy is likely to require appropriate assessment to assess avoidance and mitigation measures. An appropriate assessment of this policy is required.</p>	
<p>Affordable Housing Allocations</p>	<p>P-HA2 – Corner of Lees Field, Seale Lane Corner of Lees Field, as defined on Map HA2 below, is allocated as a Rural Exception Site for up to 2 affordable homes subject to the following:</p> <p>(a) The affordable homes will remain low-cost in perpetuity and will be secured for households with a local connection (as defined in policy HP1)</p> <p>(b) The development provides an appropriate mix of unit sizes and tenure with consideration to the latest affordable housing needs evidence</p> <p>(c) That a safe vehicular and pedestrian access can be provided on to Seale Lane to the agreement of the Local Highway Authority</p>	<p>A policy that supports small-scale housing developments is likely to lead to significant effects on the SPA through increased recreational pressure due to the proposed site falling within the 5km zone of influence of the Thames Basin Heath SPA. Although the policy includes requirements for the provision of SANGs and a contribution towards SAMM</p>	<p>Yes</p>

Policies	Policy Summary	Assessment of likelihood of significant effects	Significant effects
	<p>(d) That the existing public right of way is retained or re-provided in an acceptable location to the Parish Council and Local Highway Authority.</p> <p>(e) That an appropriate level of off-street parking is provided in accordance with policy P-TI2 and P-TI4 (f) Secure, covered cycle parking is provided in accordance with Surrey County Council standards</p> <p>(g) The layout, density and siting of new dwellings is appropriate to the site's sensitive edge of village location.</p> <p>(h) A robust landscaping and mixed native planting scheme is agreed by the LPA, and planted in the first planting season following completion of the development, to mitigate against the impact on the surrounding landscape with particular regard to the site's AONB setting.</p> <p>(i) An ecological scheme to be agreed by the LPA ensuring that existing habitats are preserved or enhanced where possible, that any loss of habitat and biodiversity on the site is adequately mitigated and that net ecological gains are provided where possible. (j) SANGs must be provided or funded, and a contribution towards SAMM must be made, in accordance with the Council's Thames Basin Heaths SPA Avoidance Strategy</p>	<p>in accordance with the Council's Thames Basin Heaths SPA Avoidance Strategy, it is deemed a mitigation measure necessary to protect the European site and therefore cannot be considered until HRA Stage 2. Therefore, this policy is likely to require appropriate assessment to assess avoidance and mitigation measures. An appropriate assessment of this policy is required.</p>	
Natural Environment	<p>P-NE1 - Natural Environment</p> <p>(1) Development proposals shall preserve and enhance the parish's natural environment and rural character, in particular with regard to the scenic and landscape qualities of the Surrey Hills Area of Outstanding Natural Beauty (AONB).</p> <p>(2) Development proposals for new dwellings outside of the Puttenham Settlement Boundary, as defined on Figure 3 above, should be supported by a Landscape and Visual Impact Assessment (LVIA) and a Landscape and Planting Scheme (L&PS) which demonstrate that the proposal has been sensitively designed to minimise its impact on the natural landscape.</p>	<p>This policy would not be likely to create any pathways of impact onto European sites. It is unlikely to lead to likely significant effects on the SPA through increased recreational pressure. This policy is unlikely to have HRA implications.</p>	None*

Policies	Policy Summary	Assessment of likelihood of significant effects	Significant effects
Natural Environment	<p>P-NE2 - Dark Night Skies Excluding householder planning applications, where planning permission is required for exterior lighting installations on land outside of the village Settlement Boundary (as defined in Figure 3 above), planning permission will only be granted where it is satisfactorily demonstrated that:</p> <p>(1) The external lighting is necessary for safety purposes or for the essential functioning of a business; and</p> <p>(2) Where an external lighting scheme demonstrates that the scheme is designed to minimise light pollution, its impact on the environment and wildlife and does not detract from the unlit environment of the Parish or exceed ILP obtrusive light limitation guidance for E1 Environment Zone.</p>	<p>This policy would not be likely to create any pathways of impact onto European sites. It is unlikely to lead to likely significant effects on the SPA through increased recreational pressure. This policy is unlikely to have HRA implications.</p>	None*
Natural Environment	<p>P-NE3 - Trees and Hedgerows</p> <p>(1) Development proposals that result in the loss of trees and hedgerows of special significance will be resisted unless it can be demonstrated that the removal is necessary due to poor health, that it poses a public safety risk or that the need for, and benefits of, the development clearly outweigh the loss.</p> <p>(2) Where the loss of a tree(s) is accepted in line with point (1) above, on-site replacement tree(s) of native species and the same biodiversity/arboricultural value will be sought in the first instance and approved by the Local Planning Authority through a landscape and planting scheme.</p> <p>(3) If mature trees or hedgerows of special significance are removed within 12 months prior to a planning application, the planning authority may require replacement planting to be undertaken by the developer to compensate for the loss of such trees or hedgerows, unless it can clearly be shown that this is not feasible.</p>	<p>This policy would not be likely to create any pathways of impact onto European sites. It is unlikely to lead to likely significant effects on the SPA through increased recreational pressure. This policy is unlikely to have HRA implications.</p>	None*

Policies	Policy Summary	Assessment of likelihood of significant effects	Significant effects
Natural Environment	<p>P-NE4 - Biodiversity</p> <p>The parish's biodiversity, and in particular biodiversity designations and protected species, will be protected and enhanced. New development should provide ecological enhancements (such as hedgehog highways, bat and bird boxes etc) where possible through incorporating new habitats, wildlife corridors and other biodiversity features. Proposals should facilitate linkages between sites of high biodiversity. Enhancements should support Biodiversity Opportunity Areas, as identified by Surrey Nature Partnership. New development must avoid harm to nature conservation interests and will only be allowed where the benefits of a scheme clearly outweigh the harm caused.</p>	<p>Policy P-NE4-Biodiversity aims to provide protection for designated sites within the neighbourhood area. This policy would not be likely to create any pathways of impact onto European sites. It is unlikely to lead to likely significant effects on the SPA through increased recreational pressure. This policy is unlikely to have HRA implications..</p>	None**
Built Environment	<p>P-BE1 – Design</p> <p>(a) All new development (including extensions to existing buildings) should be of high quality and sustainable design and construction and should respond positively to the parish's built environment, local character, important local views and natural environment/landscape setting through design, scale, mass, form, architectural features and materials.</p> <p>(b) New development that is sympathetic to its local character, notably being the consistent use of local materials, layout, architectural features and the grain of the historic core and the open, countryside setting of the village edge, will be supported.</p> <p>(c) New development must consider the visual impact of traffic and parking (including on/off street parking and garages) on the local character and should seek to minimise intrusive parking provision.</p>	<p>This policy would not be likely to create any pathways of impact onto European sites. It is unlikely to lead to likely significant effects on the SPA through increased recreational pressure. This policy is unlikely to have HRA implications.</p>	None*

Policies	Policy Summary	Assessment of likelihood of significant effects	Significant effects
Built Environment	<p>P-BE2 - Backland and Infill Development Backland and infill development will only be permitted where the following apply:</p> <p>(1) It can be demonstrated that the proposal:</p> <ul style="list-style-type: none"> a) is of an appropriate scale and mass b) respects the local context and surrounding pattern of development in terms of density and plot width. c) retains appropriate separation between buildings d) retains appropriate garden space for adjacent dwellings <p>(2) And where the proposal would avoid an unacceptable impact on:</p> <ul style="list-style-type: none"> a) The character and appearance of the Puttenham Conservation Area b) The amenity of neighbours c) Parking and traffic congestion in the area d) Loss of trees and biodiversity 	<p>This policy would not be likely to create any pathways of impact onto European sites. It is unlikely to lead to likely significant effects on the SPA through increased recreational pressure. This policy is unlikely to have HRA implications.</p>	<p>None*</p>
Built Environment	<p>P-BE3 - Sustainable Development</p> <p>(1) All new development should be designed to the highest standard of energy efficiency with careful consideration being given to the orientation of the principal rooms in new dwellings so that account is taken of future climate change, with passive solar gain and energy efficiency maximised.</p> <p>(2) Development proposals should maximise carbon reductions, incorporating renewable and/or low carbon technology unless robust justification is provided. Proposals for zero carbon development will be supported.</p> <p>(3) Development must be designed to be water efficient and reduce water consumption. New residential development must meet the highest national standard and refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits.</p>	<p>This policy would not be likely to create any pathways of impact onto European sites. It is unlikely to lead to likely significant effects on the SPA through increased recreational pressure. This policy is unlikely to have HRA implications.</p>	<p>None*</p>

Policies	Policy Summary	Assessment of likelihood of significant effects	Significant effects
Built Environment	<p>P-BE4 - Puttenham Conservation Area</p> <p>(1) Development proposals should be designed to a high quality and should preserve and enhance the character and appearance of the Puttenham Conservation Area and its setting, retaining those buildings and other features, including the areas trees and woodland, which make a significant contribution to the character of the Conservation Area and its setting.</p> <p>(2) Development proposals that cause harm to the character and appearance of the Conservation Area and/or its setting will not be permitted unless justified through public benefits that demonstrably outweigh the harm.</p> <p>(3) Any development proposals within or affecting the Puttenham Conservation Area should demonstrate how it will preserve and enhance the character and appearance of the Puttenham Conservation Area and/or its setting, as defined in the Puttenham Conservation Area Appraisal, and should be supported by information which identifies the significance of the heritage asset and demonstrates how points (1) and (2) have been met.</p>	<p>This policy would not be likely to create any pathways of impact onto European sites. It is unlikely to lead to likely significant effects on the SPA through increased recreational pressure. This policy is unlikely to have HRA implications.</p>	None*
Built Environment	<p>P-BE5 - Listed Buildings</p> <p>(1) Development proposals should have special regard to the preservation of the parish's Listed Buildings.</p> <p>(2) Development proposals that cause harm to the significance of a Listed Building (including their original structure, layout, architectural features, materials and historic landscape setting, including trees) should require clear and convincing justification and will only be permitted where the public benefits of the scheme demonstrably outweigh the harm identified.</p> <p>(3) Development proposals that seek to sympathetically repair and restore Listed Buildings (including the removal of unsympathetic non-original features and the reinstatement of historically appropriate features) and which bring Listed Buildings back into viable use will be supported. (3) Proposals affecting Listed Buildings (including their</p>	<p>This policy would not be likely to create any pathways of impact onto European sites. It is unlikely to lead to likely significant effects on the SPA through increased recreational pressure. This policy is unlikely to have HRA implications.</p>	None*

Policies	Policy Summary	Assessment of likelihood of significant effects	Significant effects
	setting) should be supported by information which identifies the significance of the heritage asset and demonstrates how points (1) and (2) above have been met.		
Community	<p>P-RP1 - Existing Community Facilities</p> <p>(1) Development proposals that result in the loss of community facilities, including public open space, sports and recreational facilities and land (including playing fields) will not be permitted unless one or more of the following applies:</p> <p>a) an assessment has been undertaken which clearly demonstrates that the existing facility and associated land is surplus to requirements and that all efforts have been made to retain the current use or attract similar uses.</p> <p>b) the existing provision would be replaced by equivalent or better provision in terms of quantity, quality and location; or</p> <p>c) the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.</p>	This policy would not be likely to create any pathways of impact onto European sites. It is unlikely to lead to likely significant effects on the SPA through increased recreational pressure. This policy is unlikely to have HRA implications.	None
Community	<p>P-RP2 - Sports and Recreation Facilities</p> <p>1) Development proposals for the improvement of existing sport, recreation and play facilities, notably at the John Green Play Area identified on Figure 5 below, including their accessibility and linkages, will be permitted where in accordance with other Neighbourhood Plan policies.</p> <p>(2) Proposals for new sport, recreation and play facilities will be supported, with a preference for outdoor gym facilities on the hardstanding next to the football pavilion (Area B as indicated on Figure 5 below)</p>	This policy would not be likely to create any pathways of impact onto European sites. It is unlikely to lead to likely significant effects on the SPA through increased recreational pressure. This policy is unlikely to have HRA implications.	None

Policies	Policy Summary	Assessment of likelihood of significant effects	Significant effects
Community	<p>P-RP3 – Allotments Development proposals which include the provision of allotments will be supported in appropriate locations subject to accordance with other Neighbourhood Plan policies.</p>	<p>This policy would not be likely to create any pathways of impact onto European sites. It is unlikely to lead to likely significant effects on the SPA through increased recreational pressure. This policy is unlikely to have HRA implications.</p>	None

* See recommendation 1

3.6 HRA Screening Conclusions

This HRA Screening Assessment has examined the Puttenham Neighbourhood Plan policies for any impacts on the European sites within the neighbourhood area or within 10km of the neighbourhood area.

There are no European sites within the Puttenham neighbourhood area. However, the northern half of the neighbourhood area (including the village of Puttenham and the proposed housing sites) lies within the 400m and 5km zone and the remainder of the neighbourhood area lies within the 5-7km buffer zone of the Thames Basin Heath SPA. Likely significant effects are identified for policies **P-HP1, P-HA1 and P-HA2**.

Appropriate assessment need for policies P-HP1, P-HA1 and P-HA2

The Plan includes the following policies that support small-scale housing developments:

- P-HP1 - Affordable Housing
- P-HA1 - Home Farm Barns
- P-HA2 – Corner of Lees Field, Seale Lane

The plan includes policy P-HP2 Thames Basin Heaths which requires the provision and funding of SANGs and a contribution towards SAMM in accordance with the Council's Thames Basin Heaths SPA Avoidance Strategy (2017), which prevents harm arising from increased recreational pressure. However, as this is deemed a mitigation measure necessary to protect the European site, it cannot be considered until HRA Stage 2. Therefore, policies P-HP1, P-HA1 and P-HA2 are likely to lead to significant effects on the SPA through increased recreational pressure on the Thames Basin Heath SPA and will require appropriate assessment to assess avoidance and mitigation measures.

To this end, an appropriate assessment of these policies is carried out in the following section.

3.7 Appropriate Assessment of Policies P-HP1, P-HA1 and P- HA2

This appropriate assessment should be read in conjunction with the Puttenham Neighbourhood Plan Screening Assessment, which sets out additional background information relating to HRA, the SPA and the established approaches to avoidance and mitigation.

Policies P-HP1 and P-HA1 to P-HA2, if implemented without avoidance and/or mitigation measures, would 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

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:

- The extent and distribution of the habitats of the three species
- The structure and function of the habitats of the three species
- The supporting processes on which the habitats of the three species rely
- The population of each of the three species, and,

- The distribution of the three species within the site.

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, policies P-HP1 and P-HA1 to P-HA2 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

Policy NRM6 of the South East Plan, Policy P5 of the LPSS 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).

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.

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 policies P-HP1 and P-HA1 to P-HA2, do not need to be within the catchment of any specific SANG³. If SANG capacity is not available or proposed to provide mitigation for new residential developments, policies P5 of the LPSS, NRM6 of the South East Plan, proposed policy P-HP2 of the Puttenham Neighbourhood Plan and the Thames Basin Heaths SPA Avoidance Strategy SPD would ensure that the new residential developments would not receive planning permission.

Therefore, it can be concluded that any development that goes ahead as a result of proposed policies P-HP1 and P-HA1 to P-HA2 will be supported by appropriate SANG and that adverse effects on the integrity of the SPA will be avoided.

3.8 Conclusion

On the basis of the above appropriate 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 Puttenham Neighbourhood Plan. Making the plan is therefore compatible with European obligations.

³ 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).

4. Puttenham Neighbourhood Plan SEA screening

4.1 SEA Screening Methodology

The methodology for the SEA screening assessment is set out in A Practical Guide to the Strategic Environmental Assessment Directive (ODPM, 2005).

To establish if a neighbourhood plan requires SEA, a screening assessment is required against a series of criteria set out in the SEA Directive. **Figure 4.1** sets out the screening process and how a plan should be assessed against the SEA Directive criteria.

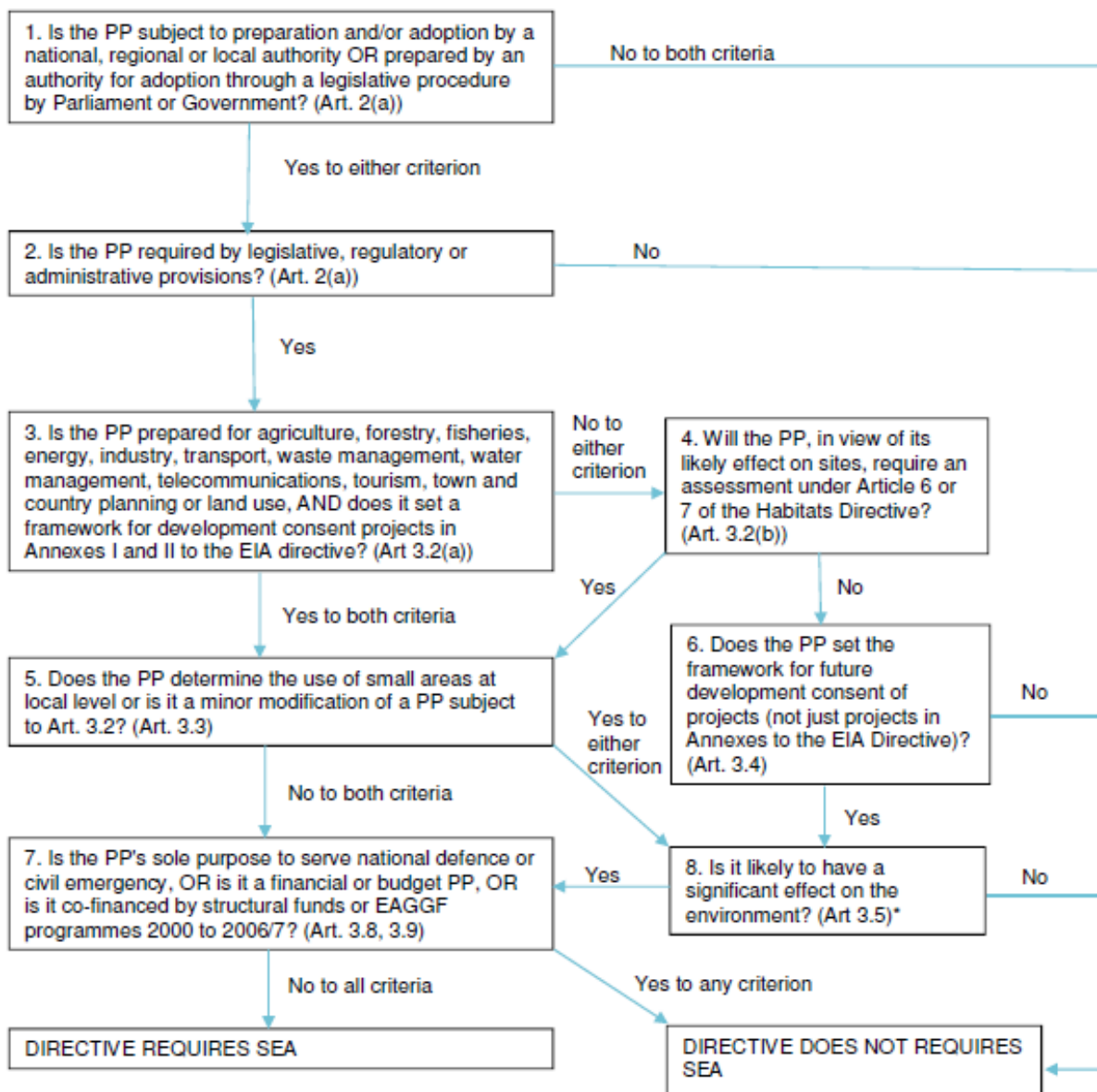


Figure 4.1: Application of the SEA Directive to plans and programmes (from “A Practical Guide to the Strategic Environmental Assessment Directive”, ODPM, 2005).

Assessing the significance of the environmental effects that a Neighbourhood Plan will have depends on the policies 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 4.2**:

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 4.2: Criteria for assessing significance

The SEA screening assessment is therefore split into two parts. Part 1 runs the draft plan through the questions outlined in the diagram above and includes commentary of whether the need for SEA is triggered. Part 2 further assesses stage 8, on whether there is a likely significant impact. 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 Puttenham Neighbourhood Plan against these criteria is set out in **Tables 4.1** and **4.2** of this report.

4.2 Part 1 – Application of the Directive to the draft Puttenham Neighbourhood Plan

Table 4.1. Establishing the need for SEA by following the flowchart in Figure 4.1

	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))	Yes (proceed to Q2)	The Puttenham Neighbourhood Plan is prepared by the parish council under the provision of the Town and Country Planning Act 1990 as amended by the Localism act 2011.
2.	Is the PP required by legislative, regulatory or administrative provisions? (Art. 2(a))	No (Yes when 'made' so proceed to Q3)	It is not a requirement for a parish to produce a Neighbourhood Plan. However, once "made" the plan forms part of the statutory Development Plan and will be used when making decision on planning applications.
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))	Yes Yes to both criteria (proceed to Q5)	The Puttenham Neighbourhood Plan is being prepared for town and country planning and land use. The Plan supports planning applications for small-scale housing developments, and does contain a general framework for future development consent and thus projects which could be listed in Annex II of the EIA Directive.
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))	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 Table 2).
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)	Yes (proceed to Q8)	The Neighbourhood Plan does allocate land for a specific purpose and show preference for the type and form of development at local level.
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)	N/A	Not applicable as both criterion to Q5 answered "No". However, the Neighbourhood Plan does direct a small-scale development to general locations such as in-fill plots and previously developed land within the three settlements which alongside the inclusion of policies to protect green spaces, village character and the environment will not cause rise to significant environmental effects.

Stage	Yes/No	Justification
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)	N/A	The Neighbourhood Plan is not prepared for any of the purposes opposite.
8. Is it likely to have a significant effect on the environment? (Art. 3.5)	No	The Puttenham Neighbourhood Plan is unlikely to have any significant effects on the environment. The plan allocates land for a small-scale development and sets out a framework for the consideration of a range of matters at the local level that due to their small size, nature and location will not cause rise to significant environmental effects. See Table 4.2 below for justification.

4.3 Part 2 – Likely significant effects on the environment

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 draft Puttenham Neighbourhood Plan would trigger the need for a full assessment.

Table 4.2: Assessing Likely Significant Effects (LSE)

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	No	The Puttenham Neighbourhood Plan sets out a vision for the parish which can be used to influence the outcome of future planning applications, consistent with the needs and expressed opinions of residents, The Plan does allocate specific land for small-scale development.
b) The degree to which the plan or programme influences other plans and programmes	No	The Puttenham Neighbourhood Plan covers a small, defined parish 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 NPPF (2019). Once adopted/'made' the Neighbourhood Plan will form part of the Development Plan for Guildford borough.

SEA Directive Criteria	Yes/No	Justification
<p>including those in a hierarchy</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>d) Environmental problems relevant to the plan or programme</p> <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</p>		<p>If the Puttenham Neighbourhood Plan is not delivered, the Guildford Local Plan is not affected. The Guildford Local Plan was subject to SA/SEA process.</p>
	No	<p>Throughout the Puttenham Neighbourhood Plan, integration of environmental considerations and promotion of sustainable development is central to the specific objectives and policies. The Plan seeks to promote sustainable development overall and does not seek any relaxations to sustainable development principles set out in higher-level plans. The Puttenham Neighbourhood Plan includes specific policies relating to the protection of the natural environment. The Puttenham Neighbourhood Plan does not seek to address any significant environmental problems in the area.</p>
	No	<p>Puttenham Neighbourhood Area is approximately 3.7 km from the Thames Basin Heaths SPA site, 1.6 km from the Thursley, Hankley and Frensham Commons SPA (Wealden Heaths Phase 1), and 6.01 km from the Wealden Heaths Phase 2 SPA.</p> <p>The Puttenham Neighbourhood Plan does allocate specific land for small-scale development that falls within the SPA 5km zone of influence and thus will be carried out in conformity with GBC's Thames Basin Heaths Special Protection Area Avoidance Strategy (2017). The Appropriate Assessment on site specific policies for affordable housing P-HP1, P-HA1 and PHA2 concluded that there will be no adverse effects on the integrity of the SPA as a result of the making of the Puttenham Neighbourhood Plan (see Sections 3.7-3.8). At this stage it is considered that the Puttenham 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 it will have significant environmental effects.</p>
	No	<p>The Puttenham Neighbourhood Plan will not affect implementation of European Community environmental legislation. The Water Framework Directive will need to be taken into account. The Puttenham Neighbourhood Plan supports the implementation of higher-level policies at the Neighbourhood Area level. It is therefore not considered to have significant influence on other plans and programmes or their effects on the environment.</p>

SEA Directive Criteria	Yes/No	Justification
management or water protection)		
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	No	The Puttenham Neighbourhood Plan does allocate land for small-scale development, and directs the type, scale and form of any small-scale future development. The Plan is supportive of sustainable development within the overall protective policy context of the Guildford Local Plan in terms of the built and natural environment. The significant effects are considered to be unlikely.
b) The cumulative nature of the effects	No	The Puttenham Neighbourhood Plan does allocate specific land for development and direct small-scale development that falls within the SPA 5km zone of influence which along with residential developments elsewhere in the wider area have the potential to cumulatively adversely impact on the Thames Basin Heaths SPA and a number of SSSIs, through increased visitor pressures. This has been assessed further as part of a Habitats Regulations Screening Assessment and the subsequent Appropriate Assessment (see Chapter 3), which concludes that the affordable housing policies will not lead to adverse effects on the integrity of the SPA and thus is compatible with European obligations.
c) The transboundary nature of the effects	No	No significant transboundary effects of the policies contained within the Puttenham Neighbourhood Plan are anticipated given that they focus on small-scale areas within the neighbourhood area itself. 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.
d) The risks to human health or the environment (e.g. due to accidents)	No	The Puttenham Neighbourhood Plan does not create any 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)	No	The Puttenham Neighbourhood Plan covers the parish of Puttenham. The magnitude and spatial extent of the Neighbourhood Plan is limited and will not have significant environmental effects across or outside of this geographical area.

SEA Directive Criteria	Yes/No	Justification
<p>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,</p> <p>g) The effects on areas or landscapes which have a recognised national, Community or international protection status.</p>	<p>No</p>	<p>Puttenham village contains numerous historic buildings, in particular along The Street, many of which are listed. The historic core of the village is designated as a Conservation Area. There are 33 Listed Buildings in the neighbourhood area including two Grade II* Listed Buildings, these being Puttenham Priory and St Johns the Baptist Church. The majority of listed buildings lie within the historic core of Puttenham village but 13 Grade II Listed Buildings lie outside of the Conservation Area in the rural parts of the neighbourhood area. There are also 10 Areas of High Archaeological Potential in the neighbourhood area, notably the historic core of the village. There are also a number of other AHAPs on the edge of the neighbourhood area.</p> <p>Proposed development for small-scale affordable housing is likely to avoid an impact upon the wider landscape. Regarding the Conservation Area and the setting of listed buildings, the Plan includes policies that prevent impacts on these and the plan supports policy at Borough and National level that protects heritage assets so that no significant environmental issues are created.</p>
	<p>No</p>	<p>It is not anticipated that the Puttenham Neighbourhood Plan will adversely impact on the Thames Basin Heaths SPA, Thursley, Hankley and Frensham Commons SPA (Wealden Heaths Phase 1), Wealden Heaths Phase 2 SPA, as well as SSSIs and/or other areas/ landscapes of community importance, as detailed above.</p> <p>Furthermore, the policies include the protection of green space, biodiversity, landscape, community assets and it is likely that the Plan will be positive by maximising the positive environmental effects of development and minimising or avoiding negative impacts.</p> <p>The Plan would support small-scale housing only so risks to the protected sites are deemed minimal.</p>
<p>Part 2 Overall Conclusion The</p>	<p><i>The Puttenham Neighbourhood Plan is unlikely to have significant effects on the environment.</i></p>	

4.4 SEA Screening Assessment Conclusion

Preparation of a Neighbourhood Plan for Puttenham is being undertaken in accordance with the Neighbourhood Planning Regulations 2012. The plan covers the period 2016 - 2033 and sets out a vision for the neighbourhood area and supports small-scale housing developments consistent with the objectively assessed need and expressed opinions of residents. Within the plan there are three themes covered with specific objectives, beneath which sit a number of policies relating to the affordable housing, transport and infrastructure, natural environment, building design and community.

This SEA Screening Report, supported by a Habitats Regulations Screening Assessment, as well as the findings of the Appropriate Assessment of the Plan policies deemed having significant effects on the European sites, has identified whether or not the Puttenham 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 Puttenham 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 Puttenham neighbourhood area.

This conclusion will be sent to the Environment Agency, Natural England and Historic England for consideration and their responses will be included in the final screening SEA and HRA report.

5. HRA and SEA Screening Consultation

Guildford Borough Council is required to consult on all SEA screening opinions with Historic England, the Environment Agency and Natural England, and with Natural England on all HRA screening opinions, before formally determining whether a strategic environmental assessment and/or appropriate assessment is needed.

Once the consultation period with the consultation bodies is over, a determination will be made and a statement of reasons will be written and made available. A notice of the determination will be available for public access within 28 days of the date of the determination (in line with SEA Regulation 11). Should the determination be 'negative' then a statement of reasons will be prepared to submit to the Local Planning Authority (LPA) alongside the submission plan.

This report will be sent to the three statutory consultees (Environment Agency, Historic England and Natural England) to seek their views on its contents. Their responses will later be included in the final screening report.

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 and HRA Directives. The Puttenham neighbourhood group will be able to use the pre-submission formal screening opinion to produce the Basic Conditions statement.

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](#)
- Designated Sites Natural England:
<https://designatedsites.naturalengland.org.uk/SiteSearch.aspx>

Appendix 1: Statutory Consultation Responses

Natural England

Thank you for consulting Natural England on the Puttenham Neighbourhood Plan's SEA and HRA screening documents.

Habitats Regulations Assessment

Natural England are in agreement with the conclusion of the HRA and appropriate assessment that, as long as development complies with Guildford Borough Council's avoidance and mitigation measures as set out in this Supplementary Planning Document, Likely Significant Effect on Thames Basin Heaths SPA as a result of the Neighbourhood Plan can be ruled out.

Strategic Environmental Assessment

Where Neighbourhood Plans could have significant environmental effects, they may require a Strategic Environmental Assessment (SEA) under the Environment Assessment of Plans and Programmes Regulations 2004 (as amended). Further guidance on deciding whether the proposals are likely to have significant environmental effects and the requirements for consulting Natural England on SEA are set out in the planning practice guidance.

Planning practice guidance also outlines that if an appropriate assessment is required for your neighbourhood plan this will also engage the need for a SEA. One of the basic conditions that will be tested by the independent examiner is whether the neighbourhood plan is compatible with European obligations, including those under the SEA Directive.

However, due to the avoidance and mitigation measures already discussed within the HRA, and the nature and scale of the policies within the Neighbourhood Plan, we support the conclusion of the screening that a SEA will not be required.

Appropriate Assessment

Natural England are in agreement with the conclusion of the Appropriate Assessment, as long as development complies with Guildford Borough Council's avoidance and mitigation measures as set out in this Supplementary Planning Document, Likely Significant Effect on Thames Basin Heaths SPA as a result of the Neighbourhood Plan can be ruled out.

Historic England

Thank you for consulting Historic England on the revised screening report for the Puttenham Neighbourhood Plan. I am happy to confirm that I am satisfied that, whilst there may be potential for effects for heritage assets resulting from the plan, albeit of a localised nature, the existing policies of the Local Plan, which have been subject to SEA provide a sufficient level of protection to ensure that these would not be regarded as significant effects within the meaning of the Direction. As such we do not feel that the two small allocations within the plan merit the completion of an SEA.

We do reserve the right to request a review of this screening opinion should the plan change significantly in scope at a later stage of drafting.

The Environment Agency

No Comment.