Habitats Regulations Assessment of the Farnham Neighbourhood Plan

Screening Document

May 2016

LEPUS CONSULTING
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY

LEPUS CONSULTING
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY

Habitats Regulations Assessment of the Farnham Neighbourhood Plan

Screening Report

LC-235	Document Control Box
Client	Farnham Town Council
Report Title	Habitats Regulations Assessment of the Farnham Neighbourhood Plan: Screening Report
Number	1
Status	Draft
Filename	LC-235 Farnham_NDP_HRA_Screening_4_050516SS.docx
Date	May 2016
Author	SBS
Reviewed	FG
Approved	NJD

Photo: Main drag by Steve Parker

Contents

Figures

Tables

Acronyms

AA	Appropriate Assessment
DEFRA	Department for Environment, Food, and Rural Affairs
FTC	Farnham Town Council
HRA	Habitats Regulations Assessment / Appraisal
IPENS	Improvement Programme for England's Natura 2000 sites
JNCC	Joint Nature Conservation Committee
LPA	Local Planning Authority
LSE	Likely Significant Effect
NDP	Neighbourhood Development Plan
NE	Natural England
NPPF	National Planning Policy Framework
SAC	Special Area of Conservation
SIP	Site Improvement Plan
SNH	Scottish Natural Heritage
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest

Executive Summary

E1 This HRA report has carefully considered the conservation objectives of European sites that might be associated with development as part of the Farnham Neighbourhood Plan.

E2 There are nine sites of European importance within the Farnham area. No further sites have been identified from a 20km area of search, or included through hydrological pathways that lie beyond this search zone.

E3 The following nine sites are included in this HRA report:

- Thames Basin Heaths SPA;
- Thursley, Ash, Pirbright & Chobham SAC;
- Thursley, Hankley & Frensham Commons (Wealden Heaths Phase I) SPA;
- Shortheath Common SAC;
- Wealden Heaths Phase II SPA;
- Woolmer Forest SAC;
- East Hampshire Hangers SAC;
- Ebernoe Common SAC; and
- Thursley & Ockley Bogs Ramsar.

E4 A number of threats and pressures facing these sites were explored during the assessment, including: recreational pressure, air quality and hydrological changes.

E5 It is recommended that the Farnham Neighbourhood Plan be screened into the HRA process on the basis that the Plan may increase the pressure / threat of air pollution at the following sites:

- Thames Basin Heaths SPA;
- Thursley, Ash, Pirbright & Chobham SAC; and
- Thursley, Hankley & Frensham Commons SPA.

1 Introduction

1.1 Background

1.1.1 Lepus Consulting has prepared this Habitats Regulations Assessment (HRA) report of the Farnham Neighbourhood Plan (NDP, Plan) on behalf of Farnham Town Council (FTC). This is a requirement of Regulation 102 of the Conservation of Habitats and Species Regulations 2010[1] (the Habitats Regulations).

1.1.2 The following European sites were identified using a 20km area of search around Farnham, as well as including sites which are potentially connected (e.g. hydrologically) beyond this distance:

- Thames Basin Heaths SPA;
- Thursley, Ash, Pirbright & Chobham SAC;
- Thursley, Hankley & Frensham Commons (Wealden Heaths Phase I) SPA;
- Shortheath Common SAC;
- Wealden Heaths Phase II SPA;
- Woolmer Forest SAC;
- East Hampshire Hangers SAC;
- Ebernoe Common SAC; and
- Thursley & Ockley Bogs Ramsar.

1.1.3 Whilst Ramsar sites are not European sites, NPPF paragraph 118 states that Ramsar sites should be given the same protection as European sites. For the purpose of this report, the phrase 'European site' includes Ramsar sites, along with Special Protection Areas (SPAs) and Special Areas of Conservation (SACs) unless otherwise stated.

1.1.4 The nature of, conservation objectives of, and pressures and threats facing each site have been explored in this report.

1.2 Approach to report preparation

1.2.1 The outputs of this report include information in relation to:

- The HRA process;
- Methodology for HRA;
- Evidence gathering in relation to European sites;
- Conservation objectives of sites;
- Understanding threats and pressures relevant to each site; and
- Conclusions and recommendations.

[1] UK Government, (2010), The Conservation of Habitats and Species Regulations 2010

1.2.2 This report comprises a screening and scoping assessment under the Habitats Regulations, which is the first step in assessing any likely significant effects of development proposals in the Farnham NDP. This report sets the baseline with regards to European sites and determines whether the Plan is likely to have any significant effects on these sites.

1.3 The HRA process

1.3.1 The application of HRA to land-use plans is a requirement of the Conservation of Habitats and Species Regulations 2010, the UK's transposition of European Directive 92/43/EEC *on the conservation of natural habitats and of wild fauna and flora* (the Habitats Directive). HRA applies to plans and projects, including all Local Development Documents in England and Wales.

1.3.2 The HRA process assesses the potential effects of a plan or project against the conservation objectives of any European sites designated for their importance to nature conservation. These sites form a system of internationally important sites throughout Europe and are known collectively as the 'Natura 2000 network'.

1.3.3 European sites provide valuable ecological infrastructure for the protection of rare, endangered or vulnerable natural habitats and species of exceptional importance within the EU. These sites consist of SACs, designated under the Habitats Directive and SPAs, designated under European Directive 2009/147/EC *on the conservation of wild birds* (the Birds Directive). Additionally, Government policy requires that sites designated under the Ramsar Convention (The Convention on Wetlands of International Importance, especially as Waterfowl Habitat) are to be treated as if they are fully designated European sites for the purpose of considering development proposals that may affect them.

1.3.4 Under Regulation 102 of the Habitats Regulations, the assessment must determine whether or not a plan will adversely affect the integrity of the European sites concerned. The process is characterised by the precautionary principle. The European Commission describes the precautionary principle as follows:

1.3.5 "If a preliminary scientific evaluation shows that there are reasonable grounds for concern that a particular activity might lead to damaging effects on the environment, or on human, animal or plant health, which would be inconsistent with protection normally afforded to these within the European Community, the **Precautionary Principle** is triggered."

1.3.6 Decision-makers then have to determine what action/s to take. They should take account of the potential consequences of no action, the uncertainties inherent in scientific evaluation, and should consult interested parties on the possible ways of managing the risk. Measures should be proportionate to the level of risk, and to the desired level of protection. They should be provisional in nature pending the availability of more reliable scientific data.

1.3.7 Action is then undertaken to obtain further information, enabling a more objective assessment of the risk. The measures taken to manage the risk should be maintained so long as scientific information remains inconclusive and the risk is unacceptable.

1.3.8 The hierarchy of intervention is important: where significant effects are likely or uncertain, plan makers must firstly seek to avoid the effect through, for example, a change of policy. If this is not possible, mitigation measures should be explored to remove or reduce the significant effect. If neither avoidance, nor subsequently, mitigation is possible, alternatives to the plan should be considered. Such alternatives should explore ways of achieving the plan's objectives that do not adversely affect European sites.

1.3.9 If no suitable alternatives exist, plan-makers must demonstrate under the conditions of Regulation 103 of the Habitats Regulations, that there are Imperative Reasons of Overriding Public Interest (IROPI) in order to continue with the proposal.

1.4 About the Farnham Neighbourhood Plan

1.4.1 Farnham is a town and civil parish located in Waverley, Surrey. Farnham Town Council is preparing a neighbourhood development plan (NDP), which will guide development in the area covered by FTC (see **Figure 4.1**). The plan making process began in February 2013, when Waverley Borough Council designated the area as a Neighbourhood Plan Area.

1.4.2 This document focuses on assessment of the Draft Farnham Neighbourhood Plan, published in October 2014 as part of a Regulation 14 options consultation. The assessment takes into account updates to the version of the plan published in October 2014, as communicated to Lepus by FTC in April 2016. This includes the removal of some site allocations and change in housing numbers for site allocations in Policy FNP11 – Housing Site Options. A summary of the updated housing allocations for FNP11, as assessed in this report, is given in **Table 1.1**.

Table 1.1: Updated housing allocations (April 2016)

Site	Approximate capacity (dwellings)
a) Colemans Yard, Wrecclesham Road	10
c) Part of SSE Farnham Depot, Lower Weybourne Lane and adjoining SSE land	100
e) The Woolmead, (East Street) – see Policy FNP17 – The Woolmead	100
i) Land between Hale Road and Guildford Road	10
j) Coal Yard, Wrecclesham Hill	15
k) West of Switchback Lane, Rowledge	10
n) Land west of Green Lane, Badshot Lea	115
o) Land at Little Acres Nursery and south of Badshot Lea	125
p) Coxbridge Farm, off Alton Road	350
r) Garden Style, Wrecclesham	75

1.4.3 This has been developed taking account of the outcomes of a series of consultation exercises with the local community. The Plan considers how best to achieve high quality development that is in keeping with the location, protecting open space and promoting local businesses, among other issues.

1.4.4 The NDP presents policies according to the following themes:

- Environment;
- Housing;
- Business;
- Farnham Town Centre and Local Centres;
- Leisure and Wellbeing; and
- Local Infrastructure.

1.4.5 Policies contained in the NDP are presented in **Table 1.2**. The full NDP is available at:

http://www.farnham.gov.uk/wp-content/uploads/2015/02/Neighbourhood-Plan-with-front-cover-6.2.15.pdf

1.5 HRA process to date

1.5.1 The HRA process is iterative and assesses different stages of the plan making process. The HRA process of this report draws on the updated methodology prepared by David Tyldesley Associates for Scottish Natural Heritage (2015), as explained in **Section 2.1**. This methodology sets out 13 stages of the HRA process, shown in **Table 2.1**.

1.5.2 FTC has determined the need for HRA and has commissioned Lepus Consulting to undertake the scoping and screening stages for the NDP. This report constitutes a screening report, which includes the completion of stages 1-7 (**Table 2.1**).

Table 1.2: Policies contained in the Farnham Neighbourhood Plan

Environment	
FNP1	Design of New Development and Conservation
FNP2	Farnham Town Centre Conservation Area and its setting
FNP3	Shop Fronts within Farnham Conservation Area and its setting
FNP4	Advertisements within Farnham Conservation Area and its setting
FNP5	South Farnham Arcadian Areas
FNP6	Buildings and Structures of Character
FNP7	Protect and Enhance the Countryside
FNP8	Preventing Coalescence between Farnham and Aldershot; Badshot Lea and Weybourne; Rowledge and Wrecclesham and Rowledge and Frensham
FNP9	Thames Basin Heaths Special Protection Area (SPA)
FNP10	Protect and Enhance Biodiversity
Housing	
FNP11	Housing Site Options
FNP12	Small Scale Dwellings
FNP13	Building Extensions Within and Outside the Built Up Area Boundary
Business	
FNP14	Land for Business
FNP15	Business Site Option
FNP16	Rural Buildings for Business and Tourist Uses
Farnham Town Centre and Local Centres	
FNP17	The Woolmead
FNP18	Farnham Town Centre
FNP19	Local Centres
Leisure and Wellbeing	
FNP20	Public Open Space
FNP21	Indoor Sports Facilities
FNP22	Cultural Facilities
Infrastructure	
FNP23	Transport Impact of Development
FNP24	Securing Infrastructure

2 Methodology

2.1 Guidance and best practice

2.1.1 Guidance on HRA has been published in draft form by the Government (DCLG, 2006) and Natural England in conjunction with David Tyldesley Associates (Local Development Plan Documents under the Provisions of the Habitats Regulations, 2009); both draw, in part, on European Union guidance (European Commission, 2001) regarding the methodology for undertaking appropriate assessment (AA) of plans.

2.1.2 All guidance recognises that there is no statutory method for undertaking HRA and that the adopted method must be appropriate to its purpose under the Habitats Directive and Regulations; this concept is one of the reasons why HRA is often referred to as appropriate assessment.

2.1.3 In the absence of finalised guidance from the Government, Natural England has suggested that the updated guidance on HRA published by Scottish Natural Heritage (SNH, 2015) can be used to assess land use plans[2].

2.1.4 For the purposes of this report Habitats Regulations Appraisal and Habitats Regulations Assessment are synonymous.

2.1.5 Paragraph 1.3 of the SNH guidance states that "the procedure referred to in this guidance is that of 'Habitats Regulations Appraisal' (HRA) which encompasses the requirements of Article 6(3) of the Habitats Directive…The procedure is sometimes referred to as an 'appropriate assessment', but this can be confusing because an appropriate assessment is only one particular stage in the process of Habitats Regulations Appraisal. Not all plans undergoing Habitats Regulations Appraisal will reach the stage of appropriate assessment, because some plans would not be likely to have a significant effect on a European site".

2.1.6 The term 'Habitats Regulations Appraisal' is used here to encompass the decision on whether the plan should be subject to appraisal, the 'screening' process for determining whether an 'appropriate assessment' is required, as well as any 'appropriate assessment' that may be required. It is important to remember that an appropriate assessment is only required where the plan-making body determines that the plan is likely to have a significant effect on a European site in Great Britain, or a European Offshore Marine Site, either alone or in combination with other plans or projects, and the plan is not directly connected with or necessary to the management of the site.

[2] pers. comm.

2.2 Habitats Regulations Assessment methodology

2.2.1 This HRA follows the methodology prepared by David Tyldesley Associates for Scottish Natural Heritage (SNH, 2015). A step-by-step methodology is outlined in the guidance (see **Appendix B**) and has been summarised in **Table 2.1**. Stages 1 to 7 are relevant to this report.

2.3 Dealing with uncertainty

2.3.1 The assessment of effects can be affected by uncertainty in a number of ways; some of these are addressed below.

2.3.2 **Regulatory Uncertainty:** Some plans will include references to proposals that are planned and implemented through other planning and regulatory regimes, for example, trunk road or motorway improvements. These will be included because they have important implications for spatial planning, but they are not proposals of the Local Planning Authority (LPA), nor are they proposals brought forward by the plan itself. Their potential effects will be assessed through other procedures. The LPA may not be able to assess the effects of these proposals. Indeed, it may be inappropriate for them to do so, and would also result in unnecessary duplication.

2.3.3 There is a need to focus the Habitats Regulations Assessment on the proposals directly promoted by the plan, and not all and every proposal for development and change, especially where these are planned and regulated through other statutory procedures, which will be subject to HRA.

2.3.4 **Planning Hierarchy Uncertainty:** The higher the level of a plan in the hierarchy the more general and strategic its provisions will be and therefore the more uncertain its effects will be. The protective regime of the Directive is intended to operate at differing levels. In some circumstances assessment 'down the line' will be more effective in assessing the potential effects of a proposal on a particular site and protecting its integrity. However, three tests should be applied.

2.3.5 It will be appropriate to consider relying on the HRA of lower tier plans, in order for an LPA to ascertain a higher tier plan would not have an adverse effect on the integrity of a European site, only where:

A] The higher tier plan assessment cannot reasonably assess the effects on a European site in a meaningful way; whereas

B] The HRA of the lower tier plan, which will identify more precisely the nature, scale or location of development, and thus its potential effects, will be able to change the proposal if an adverse effect on site integrity cannot be ruled out, because the lower tier plan is free to change the nature and/or scale and/or location of the proposal in order to avoid adverse effects on the integrity of any European site (e.g. it is not constrained by location specific policies in a higher tier plan); and

C] The HRA of the plan or project at the lower tier is required as a matter of law or Government policy.

2.3.6 It may be helpful for the HRA of the higher tier plan to indicate what further assessment may be necessary in the lower tier plan.

2.3.7 **Implementation Uncertainty:** In order to clarify the approach where there is uncertainty because effects depend on how the plan is implemented, and to ensure compliance with the Regulations, it may be appropriate to impose a caveat in relevant policies, or introduce a free-standing policy, which says that any development project that could have an adverse effect on the integrity of a European site will not be in accordance with the plan.

2.3.8 This would help to enable the assessors to reasonably conclude, on the basis of objective information, that even where there are different ways of implementing a plan, and even applying the precautionary principle, no element of the plan can argue that it draws support from the plan, if it could adversely affect the integrity of a European site.

2.4 Likely significant effect

2.4.1 The plan and its component policies are assessed to determine and identify any potential for **'likely significant effect'** (LSE) upon European sites. The guidance (SNH, 2015) provides the following interpretation.

2.4.2 "A likely effect is one that cannot be ruled out on the basis of objective information. The test is a 'likelihood' of effects rather than a 'certainty' of effects. Although some dictionary definitions define 'likely' as 'probable' or 'well might happen', in the Waddenzee case the European Court of Justice ruled that a project should be subject to appropriate assessment "if it cannot be excluded, on the basis of objective information, that it will have a significant effect on the site, either individually or in combination with other plans and projects". Therefore, 'likely', in this context, should not simply be interpreted as 'probable' or 'more likely than not', but rather whether a significant effect can objectively be ruled out".

Table 2.1: Synoptic version of the flow chart in **Appendix B** identifying screening and appropriate assessment stages within the HRA process

Group		HRA Stage
Determination of Need and Compilation of Evidence Base	Stage 1	Determination of need
	Stage 2	Identification of European sites that should be considered in the appraisal
	Stage 3	Gathering information on European sites
	Stage 4	Discretionary discussions on the method and scope of the appraisal
Screen all aspects of plan (Screening)	Stage 5	Screening the plan
	Stage 6	Applying mitigation measures at screening stage to avoid likely significant effects
	Stage 7	Rescreen the plan and decide on the need for appropriate assessment
Appropriate Assessment	Stage 8	The appropriate assessment – site integrity, conservation objectives and the precautionary principle
	Stage 9	Amending the plan until there would be no adverse effects on site integrity
Consultation of Draft	Stage 10	Preparing a draft of HRA
	Stage 11	Consultation
	Stage 12	Proposed modifications
	Stage 13	Modifying and completing HRA

2.5 Limitations

2.5.1 This report has been prepared using the best available data. References are cited in the text where appropriate. Lepus Consulting has collected no primary data in the preparation of this report.

3 European Sites

3.1 About European sites

3.1.1 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).

3.1.2 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.

3.1.3 During the screening process, as a starting point to explore and identify which European sites might be affected by the Farnham NDP, a 20km area of search was applied. The guidance (SNH, 2015) specifies no specific size of search area. The inclusion of a specific search area was to facilitate the use of the following list of criteria for identification of European sites. Other sites beyond this zone were also reviewed on the basis that they may be connected physiographically.

Table 3.1: Criteria for identification of European sites (SNH, 2015)

Selection of European sites	
Criteria	European sites to check
All plans	Sites within the plan area, including those for the criteria listed below
For plans that could affect the aquatic environment	Sites upstream or downstream of the plan area in the case of a river or estuary
	Peatland and other wetland sites with relevant hydrological links to land within the plan area, irrespective of distance from the plan area
For plans that could affect mobile species	Sites which have significant ecological links with land in the plan area, for example, land in the plan area may be used by migratory birds, which also use a SPA, outside the plan area, at different times of year
For plans that could increase recreational pressure on European sites potentially vulnerable to such pressure	European sites in the plan area
	European sites within a reasonable travel distance of the plan area boundaries that may be affected by local recreational or other visitor pressure within the plan area (the appropriate distance in each case will need to be considered on its merits, in light of any available evidence)
	European sites within a longer travel distance of the plan area, which are major (regional or national) visitor attractions such as European sites which are National Nature Reserves where public visiting is promoted, sites in National or Regional Parks, coastal sites and sites in other major tourist or visitor destinations (the appropriate distance in each case will need to be considered on its merits, in light of any available evidence)
For plans that would increase the amount of development	Sites that are used for, or could be affected by, water abstraction in or close to the plan area
	Sites used for, or which could be affected by, discharge or effluent from waste water treatment works or other waste management streams serving land in the plan area, irrespective of distance from the plan area
	Sites that could be affected by transport or other infrastructure (e.g. by noise or visual disturbance)
	Sites that could be affected by increased deposition of air pollutants arising from the proposals, including emissions from significant increases in traffic
For plans that could affect the coast	Sites in the same coastal 'cell', or part of the same coastal ecosystem, or where there are interrelationships with or between different physical coastal processes

3.2 Ecological information

3.2.1 **Table 3.1** presents information about the criteria used for the identification of European sites in the HRA process. **Appendix A** identifies the qualifying features of each site and presents details of conservation objectives for each of the nine sites identified as potentially being affected by the Farnham NDP. The information is drawn from the Joint Nature Conservancy Council (JNCC) and Natural England (NE).

4 Potential Effects

4.1 Introduction

4.1.1 Baseline research identified nine sites for assessment:

- Thames Basin Heaths SPA;
- Thursley, Ash, Pirbright & Chobham SAC;
- Thursley, Hankley & Frensham Commons (Wealden Heaths Phase I) SPA;
- Short Heath Common SAC;
- Wealden Heaths Phase II SPA;
- Woolmer Forest SAC;
- East Hampshire Hangers SAC;
- Ebernoe Common SAC; and
- Thursley & Ockley Bogs Ramsar.

4.1.2 The locations of these European Sites are illustrated in **Figure 4.1**.

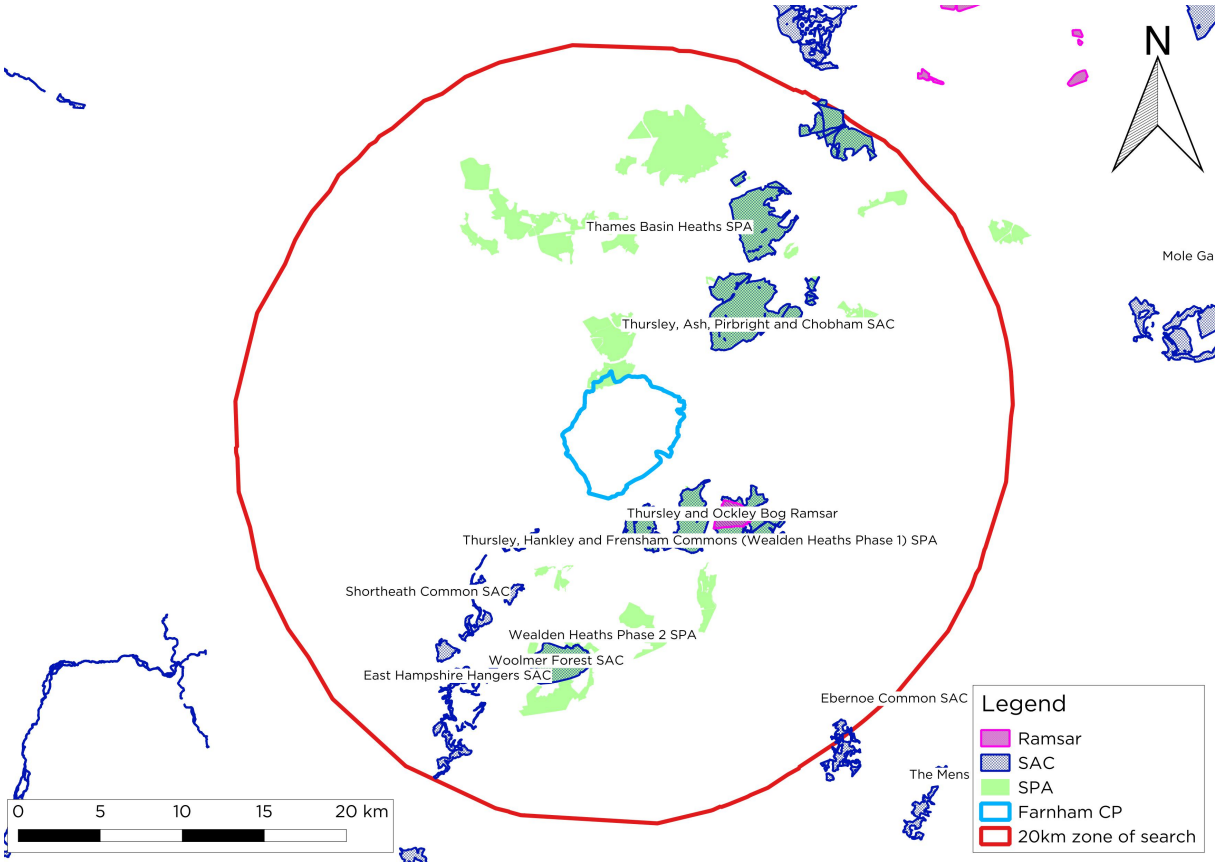


Figure 4.1: Map illustrating location of European Sites (SPAs, SACs and Ramsar sites) and a 20km buffer around Farnham

4.2 Conservation objectives

4.2.1 The Waddenzee case[3] demonstrates that the effect of a plan or project on a European site cannot be considered to be significant if it '*is not likely to undermine its conservation objectives*'. The conservation objectives and qualifying features of each European site are presented in **Appendix A**. To help determine whether these conservation objectives will be undermined, this report considers whether any existing pressures on or threats to the site will be exacerbated.

4.3 Site pressures and threats

4.3.1 Site pressures and threats have been derived from data held by the JNCC and Natural England. SAC and SPA information is held on Natura 2000 Data Forms, including threats and pressures that would have a negative impact on the SAC and activities and management that would have a positive effect on each site. Site Improvement Plans (SIPs) have been developed for each European site as part of the Improvement Programme for England's Natura 2000 sites (IPENS). These set out an overview of current and predicted issues at the site. Information regarding pressures and threats from Natura 2000 Data Forms and SIPs are summarised in **Table 4.1** and discussed in the following sections.

4.3.2 The Ramsar Information Sheet for Thursley and Ockley Bogs[4] states that there are no factors adversely affecting the site's ecological character. The Ramsar Information Sheet was prepared in 2008 and more recent data may have come to light since this time. Thursley & Ockley Bogs Ramsar site lies wholly within Thursley, Hankley & Frensham Commons SPA and two of the features fulfilling Ramsar Criterion 3 (see **Appendix A**) are the same as two of the qualifying features for the SPA (European nightjar and woodlark). The SIP for Thursley, Hankley & Frensham Commons SPA states that there are a number of threats and pressures at the site affecting European nightjar and woodlark. This report has assumed that such threats and pressures are also relevant to Thursley and Ockley Bogs Ramsar site.

[3] European Commission Case C-127/02 Reference for a Preliminary Ruling 'Waddenzee' 07/9/2004 (para 45)

[4] JNCC (2008) Information Sheet on Ramsar Wetlands (RIS): Thursley and Ockley Bog, [online] Available at: https://rsis.ramsar.org/RISapp/files/RISrep/GB647RIS.pdf

Table 4.1: Threats and pressures for each European site identified as potentially being affected by Farnham NDP

Threats and pressures	Thames Basin Heaths SPA	Thursley, Ash, Pirbright & Chobham SAC	Thursley, Hankley & Frensham Commons SPA	Shortheath Common SAC	Wealden Heaths Phase II SPA	Woolmer Forest SAC	East Hampshire Hangers SAC	Ebernoe Common SAC
Air pollution	✔ab All qualifying features	✔ab All qualifying features	✔ab All qualifying features	✔b All qualifying features		✔b All qualifying features	✔ab All qualifying features	✔b All qualifying features
Other human intrusions and 3rd party impacts				✔b European dry heaths				
Biocenotic evolution, succession	✔a	✔a	✔a	✔a				
Forestry and woodland/plantation management	✔a*b All qualifying features	✔b Wet heathland with cross-leaved heath European dry heath	✔b All qualifying features				✔a*b Mixed woodland on base-rich soils associated with rocky slopes	✔a*b All qualifying features
Public access and sports / recreational activities	✔ab All qualifying features		✔ab All qualifying features	✔ab All qualifying features	✔ab All qualifying features	✔a		✔b Bechstein's bat
Hydrological changes	✔b All qualifying features	✔ab Wet heathland with cross-leaved heath Depressions on peat	✔b All qualifying features		✔a	✔ab Wet heathland with cross-leaved heath Very wet mires often		✔ab Bechstein's bat

		substrates				identified by an unstable 'quaking' surface Depressions on peat surfaces		
Grazing regime	✔[b] All qualifying features	✔[a*b] All qualifying features	✔[b] All qualifying features					
Wildfire / arson	✔[b] All qualifying features	✔[b] All qualifying features	✔[b] All qualifying features		✔[b] All qualifying features	✔[b] Wet heathland with cross-leaved heath European dry heaths Very wet mires often identified by an unstable 'quaking' surface		
Habitat fragmentation	✔[b] All qualifying features	✔[b] All qualifying features	✔[b] All qualifying features					✔[b] Barbastelle bat Bechstein's bat
Invasive species		✔[b] Wet heathland with cross-leaved heath European dry heath			✔[a]	✔[ab] Acid peat-stained lakes and ponds	✔[ab] Mixed woodland on base-rich soils associated with rocky slopes	
Military activities	✔[b] All qualifying features	✔[b] All qualifying features	✔[b] All qualifying features		✔[b] All qualifying features	✔[b] Acid peat-stained lakes and ponds Wet heathland with cross-leaved heath		

						European dry heaths Very wet mires often identified by an unstable 'quaking' surface		
Feature location / extent / condition unknown	✔[b] All qualifying features		✔[b] All qualifying features		✔[b] All qualifying features	✔[b] Acid peat-stained lakes and ponds Wet heathland with cross-leaved heath European dry heaths Very wet mires often identified by an unstable 'quaking' surface		
Inappropriate scrub control	✔[b] All qualifying features	✔[b] Wet heathland with cross-leaved heath European dry heath	✔[b] All qualifying features	✔[b] European dry heaths Very wet mires often identified by an unstable 'quaking' surface				
Change in cultivation practices / land management					✔[ab*] All qualifying features	✔[ab*] Wet heathland with cross-leaved heath European dry heaths Very wet mires often identified by an unstable 'quaking' surface Depressions on peat		✔[ab] Barbastelle bat

						surfaces		
Changes in biotic conditions (climate change)								✔[a]
Other ecosystem modifications								✔[a]
Offsite habitat availability / management								✔[b] Barbastelle bat Bechstein's bat
Unknown threat or pressure					✔[a]	✔[a]		

[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

4.4 Scoping out pressures and threats

4.4.1 The following threats and pressures identified in **Table 4.1** have been scoped out of further discussion as they are beyond the influence of the NDP:

- Forestry and woodland / plantation management;
- Grazing regime;
- Military activities;
- Inappropriate scrub control;
- Changes in cultivation practices / land management;
- Changes in biotic conditions (climate change); and
- Biocenotic evolution, succession.

4.4.2 The following threats and pressures identified in **Table 4.1** have been scoped out of further discussion as they are too vague to enable a meaningful assessment:

- Feature location / extent / condition unknown; and
- Unknown threat or pressure.

4.4.3 It is recommended that more data be collected on these issues. If additional data becomes available, this HRA should be revisited.

4.5 Air pollution

Vulnerability of European site

4.5.1 Air pollution, in particular, atmospheric nitrogen deposition, is a pressure relevant to all European sites considered in this HRA, with the exception of Wealden Heaths Phase II SPA. There is an Air Quality Management Area in Farnham, along the A325 through the town centre, which has been designated due to high levels of nitrogen oxide. There is a possibility that the plan will extend the effects of this towards European sites.

4.5.2 As 87.8% of households in Farnham have at least one car or van, it is assumed that the majority of new households, including those associated with housing development proposed in the Plan, will have at least one car or van. This will lead to a greater number of cars on the road in Farnham and the surrounding area. A number of key roads pass through Farnham that also pass near or through European sites. The Design Manual for Roads and Bridges (DMRB) suggests that air quality impacts from vehicles are most likely to occur within 200m of a road[5]. Heading northwest from Farnham town, the A287 runs along the boundary of Thames Basin Heaths SPA and provides a key link to the M3. Outside of Farnham, the A287 passes south through Thursley, Hankley & Frensham Commons SPA and Thursley, Ash, Pirbright & Chobham SAC, providing a link to the A3, Chichester and the south coast. These sites are most likely to be affected by air pollution resulting from increased traffic generated by the Farnham NDP.

4.6 Other human intrusions and 3rd party impacts

4.6.1 This pressure / threat refers to encroachment by householders onto Shortheath Common SAC. As Shortheath Common SAC lies outside of Farnham and this threat / pressure is concerned only with householders local to the SAC, it is not anticipated that the Farnham NDP will have an impact on this threat / pressure.

4.7 Public access and sports / recreational activities

4.7.1 Public access and sports / recreational activities has been identified as a pressure / threat against the following European sites:

- Thames Basin Heaths SPA;
- Thursley, Hankley & Frensham Commons SPA;
- Shortheath Common SAC;
- Wealden Heaths Phase II SPA;
- Woolmer Forest SAC;
- Ebernoe Common SAC; and
- Thursley & Ockley Bogs.

[5] The Highways Agency, Transport Scotland, Welsh Assembly Government, The Department for Regional Development Northern Ireland (2007) Design Manual for Roads and Bridges, Volume 11, Section 3, Part 1: Air Quality

4.7.2 The HRA of Housing Scenarios for Waverley Local Plan[6] collated visitor information on European sites within the Borough. This found that 75% of dog walkers and 54% of visitors came from within 5km of Wealden Heaths SPA and visits outside of 5km correlated with the A3 corridor. As Farnham is approximately 5km from Wealden Heaths SPA at its nearest point and does not lie along the A3 corridor, the effects of the NDP on Wealden Heaths Phase II SPA, and the coincident Woolmer Forest SAC, are likely to be negligible.

4.7.3 Some 70% of visitors to Thursley, Hankley and Frensham Commons SPA, with which Thursley & Ockley Bogs is partially coincident, come from within 9km of the site. Whilst Farnham is within 9km of these sites, a previous visitor survey suggested that visitors from Farnham are more likely to utilise Thames Basin Heaths SPA, due to its closer proximity[7].

4.7.4 Some 70% of visitors to Shortheath Common SAC come from within 600m, which suggests few visitors from Farnham would utilise this site[8].

4.7.5 There is very limited, publically accessible visitor information for Ebernoe Common SAC. Given that visitors from Farnham are more likely to utilise Thames Basin Heaths than Thursley, Hankley and Frensham Commons SPA, it is considered unlikely that may visitors to Ebernoe Common come from Farnham, as it is further still from Farnham.

4.7.6 The primary recreational impacts of the Plan are expected to be in relation to Thames Basin Heaths SPA. Policy FNP9 of the NDP supports the Waverley Thames Basin Heaths Special Protection Area Avoidance Strategy[9] and the Thames Basin Heaths Special Protection Area Delivery Framework[10]. Policy FNP9 is considered sufficient to reduce recreational impacts of the NDP on Thames Basin Heaths to a negligible level.

4.8 Hydrological changes

4.8.1 Hydrological changes have been identified as a pressure / threat against the following European sites:

- Thames Basin Heaths SPA;
- Thursley, Ash, Pirbright & Chobham SAC;
- Thursley, Hankley & Frensham Commons SPA;

[6] URS (2014) Waverley Local Plan Habitats Regulations Assessment Analysis of Housing Scenarios

[7] Ibid

[8] EPR (2012) Whitehill & Bordon Eco-town, Visitor Survey Report

[9] Waverley Borough Council (2009, Updated 2013) Thames Basin Heaths Special Protection Area Avoidance Strategy

[10] Thames Basin Heaths Joint Strategic Partnership Board (2009) Thames Basin Heaths Special Protection Area Delivery Framework

- Wealden Heaths Phase II SPA;
- Woolmer Forest SAC;
- Ebernoe Common SAC; and
- Thursley & Ockley Bogs.

4.8.2 South East Water supplies water in Farnham. South East Water's Water Resource Management Plan (WRMP) states that 75% of the water supply comes from groundwater. As such, the increased water demand associated with development proposed in the Plan is expected to come primarily from groundwater sources, which will not affect any of the European sites.

4.8.3 None of the sites allocated by the plan are expected to change the flooding regime of any European sites, due to a combination of site size and location. As such, the NDP is not expected to lead to hydrological changes at any European sites in the area.

4.8.4 The HRA of South East Water's WRMP concluded that, of the sites considered in this assessment, the WRMP would have an affect on Thames Basin Heaths SPA at Surrey Hills, due to a potential extension of the water service reservoir, needed to serve increasing demand. This was explored though an appropriate assessment, which concluded that significant adverse effects were capable of being mitigated[11].

4.9 Wildfire / arson

4.9.1 Wildfire / arson has been identified as a pressure / threat against the following European sites:

- Thames Basin Heaths SPA;
- Thursley, Ash, Pirbright & Chobham SAC;
- Thursley, Hankley & Frensham Commons SPA;
- Wealden Heaths Phase II SPA;
- Woolmer Forest SAC; and
- Thursley & Ockley Bogs Ramsar.

4.9.2 The NDP is not expected to affect the frequency or nature of wildfires, as this is dependent on the existing site management regime and climatic factors. Any increase in the risk of arson arising from the NDP is deemed to be negligible.

4.10 Habitat fragmentation

4.10.1 Habitat fragmentation has been identified as a pressure / threat against the following European sites:

[11] South East Water (2014) WRMP14, 2014 Water Resources Management Plan Habitats Regulations Assessment Screening Report and Appropriate Assessment

- Thames Basin Heaths;
- Thursley, Ash, Pirbright and Chobham SAC;
- Thursley, Hankley & Frensham Commons SPA;
- Ebernoe Common SAC; and
- Thursley & Ockley Bogs Ramsar.

4.10.2 The NDP does not promote development within any European sites. As such, the NDP is not expected to lead to any direct habitat loss or fragmentation of European sites.

4.11 Invasive species

4.11.1 Invasive species have been identified as a pressure / threat against the following European sites:

- Thursley, Ash, Pirbright & Chobham SAC;
- Wealden Heaths Phase II SPA;
- Woolmer Forest SAC; and
- East Hampshire Hangers SAC.

4.11.2 SIPs for these sites indicate that each site has issues with a specific invasive species. Thursley, Ash, Pirbright & Chobham SAC is threatened by Rhododendron and Gaultheria; Wealden Heaths Phase II SPA and Woolmer Forest SAC are threatened by *Crassula helmsii;* and East Hampshire Hangers SAC is threatened by a non-native hybrid ivy. The NDP is not expected to affect the vitality or spread of any of these plant species and will therefore not increase the pressure / threat of invasive species at these sites.

4.12 Other ecosystem modifications

4.12.1 This pressure / threat has been identified in relation to Ebernoe Common SAC. The Data Dictionary from the European Environment Agency[12] indicates that this category of pressures / threats includes the following:

- Reduction or loss in specific habitat features;
- Anthropogenic reduction of habitat connectivity;
- Reduction, lack or prevention of erosion; and
- Applied (industrial) destructive research.

4.12.2 As discussed in **Section 4.10**, the NDP is not expected to lead to any direct loss of habitat nor is it expected to reduce habitat connectivity. The NDP is not expected to lead to any destructive research in Ebernoe Common SAC.

[12] European Environment Agency (2013) EIONET Data Dictionary [online], available at: http://dd.eionet.europa.eu, accessed: 29/04/16

4.12.3 Erosion from the NDP would most likely be caused by residents visiting the site. As explained in **Section 4.7**, Farnham is unlikely to generate significant numbers of visitors to Ebernoe Common SAC. As such the NDP is not expected to contribute to the pressure / threat of other ecosystem modifications.

4.13 Offsite habitat availability / management

4.13.1 Offsite habitat availability / management has been identified as a pressure for Ebernoe Common SAC. This pressure affects Barbastelle bats (*Barbastella barbastellus*) and Bechstein's bats (*Myotis bechsteinii*) in particular.

4.13.2 A study of Barbastelle bats in southern England found home ranges to be between 1km and 20km, but recommended conservation efforts should target conservation and enhancement of habitats within 7km of roost sites[13]. The Bat Conservation Trust advises that Bechstein's bats tend to forage in woodland within a kilometre or two of their roosts[14].

4.13.3 Development in Farnham is unlikely to affect this pressure, as it is expected to be largely beyond the likely range of Barbastelle and Bechstein's bats from Ebernoe Common SAC.

[13] Zeale, M. R. K., Davidson-Watts, I., Jones, G., (2012) Home range use and habitat selection by barbastelle bats (*Barbastella barbastellus*): implications for conservation

[14] Bat Conservation Trust (2010) Bechstein's bat factsheet, available at: http://www.bats.org.uk/data/files/Species_Info_sheets/bechsteins.pdf, accessed: 29/04/2016

5 Conclusions and Recommendations

5.1 Assessment findings

5.1.1 There are eight Natura 2000 sites and one Ramsar site within 20km of Farnham.

5.1.2 This HRA report has outlined the threats and pressures that have the potential to undermine the conservation objectives of each European site and Ramsar site considered.

5.1.3 It is recommended that the Farnham NDP be screened into the HRA process on the basis of potential increases in air pollution. This applies to Thames Basin Heaths SPA and Thursley, Hankley & Frensham Commons SPA. The policies of primary concern are FNP11, FNP12, FNP14, FNP15 and FNP17. These policies promote and/or allocate housing development and development of business / employment sites. Any housing development is expected to lead to an associated increase in cars in the area. Change in business use and/or allocation of new employment sites may also lead to an increase in vehicular traffic in the area.

5.2 Next steps

5.2.1 This report is subject to comments and review by the client team and will then be subject to consultation with Natural England. Due to the identification of a likely significant effect of the Plan on European sites, the Farnham Neighbourhood Plan should be subject to Appropriate Assessment.

References

David Tyldesley and Associates and Scottish Natural Heritage (2015), Habitats Regulations Appraisal of Plans: Guidance for Plan-making Bodies in Scotland, Version 3.0

European Commission (2001), Assessment of Plans and Projects Significantly Affecting Natura 2000 Sites: Methodological Guidance on the Provisions of Articles 6(3) and (4) of the Habitats Directive 92/43/EEC

European Commission (1992), Directive 92/43/EEC of 21 May 1992 on the Conservation of Natural Habitats of Wild Fauna and Flora

European Commission (2009), Directive 2009/147/EC on the Conservation of Wild Birds

JNCC, (2015), Natura 2000 Standard Data Form: East Hampshire Hangers, [online] Available at: http://jncc.defra.gov.uk/protectedsites/sacselection/n2kforms/UK0012723.pdf

JNCC, (2015), Natura 2000 Standard Data Form: Ebernoe Common, [online] Available at: http://jncc.defra.gov.uk/protectedsites/sacselection/n2kforms/UK0012715.pdf

JNCC, (2015), Natura 2000 Standard Data Form: Thames Basin Heaths, [online] Available at: http://jncc.defra.gov.uk/pdf/SPA/UK9012141.pdf

JNCC, (2015), Natura 2000 Standard Data Form: Thursley, Ash, Pirbright and Chobham, [online] Available at: http://jncc.defra.gov.uk/protectedsites/sacselection/n2kforms/UK0012793.pdf

JNCC, (2015), Natura 2000 Standard Data Form: Thursley, Hankley and Frensham Commons (Wealden Heaths Phase 1), [online] Available at: http://jncc.defra.gov.uk/pdf/SPA/UK9012131.pdf

JNCC (2008) Information Sheet on Ramsar Wetlands (RIS): Thursley and Ockley Bog, [online] Available at: https://rsis.ramsar.org/RISapp/files/RISrep/GB647RIS.pdf

JNCC (2015), Natura 2000 Standard Data Form: Shortheath Common, [online] Available at: http://jncc.defra.gov.uk/protectedsites/sacselection/n2kforms/UK0030275.pdf

JNCC (2015), Natura 2000 Standard Data Form: Wealden Heaths Phase 2, [online] Available at: http://jncc.defra.gov.uk/pdf/SPA/UK9012132.pdf

JNCC (2015), Natura 2000 Standard Data Form: Woolmer Forest, [online] Available at: http://jncc.defra.gov.uk/protectedsites/sacselection/n2kforms/UK0030304.pdf

Natural England (2014) Site Improvement Plan: East Hampshire Hangers

Natural England (2014) Site Improvement Plan: Ebernoe Common

Natural England (2014) Site Improvement Plan: Shortheath Common

Natural England (2014) Site Improvement Plan: Thames Basin

Natural England (2014) Site Improvement Plan: Wealden Heaths Woolmer Forest

APPENDIX A

European site: Conservation Objectives (where available from Natural England).
* Denotes a priority natural habitat or species

Thames Basin Heaths SPA

Conservation objectives:

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

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

Qualifying Features:

- A224 *Caprimulgus europaeus*; European nightjar (breeding)
- A246 *Lullula arborea*: Woodlark (breeding)
- A302 *Sylvia undata*; Dartford warbler (breeding).

Thursley, Ash, Pirbright & Chobham SAC

Conservation objectives:

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

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

Qualifying Features:

- H4010. Northern Atlantic wet heaths with *Erica tetralix*; Wet heathland with cross-leaved heath
- H4030. European dry heaths
- H7150. Depressions on peat substrates of the *Rhynchosporion.*

Thursley, Hankley & Frensham Commons (Wealden Heaths Phase I) SPA

Conservation objectives:

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

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

Qualifying Features:

- A224 *Caprimulgus europaeus*; European nightjar (breeding)
- A246 *Lullula arborea*: Woodlark (breeding)
- A302 *Sylvia undata*; Dartford warbler (breeding).

Natural England has released Draft Supplementary Advice on Conserving and Restoring Site Features (2016) for Thames Bain Heaths SPA. This provides the following table as a general guide to months in which significant numbers of each qualifying feature is most likely to be present at the SPA i.e. the breeding season of each qualifying feature:

Feature	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Dartford Warbler												
European Nightjar												
Woodlark												

Shortheath Common SAC

Conservation objectives:

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

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

Qualifying Features:

- H4030. European dry heaths
- H7140. Transition mires and quaking bogs; Very wet mires often identified by an unstable 'quaking' surface
- H91D0. Bog woodland*

Wealden Heaths Phase II SPA

Conservation objectives:

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

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

Qualifying Features:

- A224 *Caprimulgus europaeus*; European nightjar (breeding)
- A246 *Lullula arborea*: Woodlark (breeding)
- A302 *Sylvia undata*; Dartford warbler (breeding).

Woolmer Forest SAC

Conservation objectives:

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

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

Qualifying Features:

- H3160. Natural dystrophic lakes and ponds; Acid peat-stained lakes and ponds
- H4010. Northern Atlantic wet heaths with *Erica tetralix*; Wet heathland with cross-leaved heath
- H4030. European dry heaths
- H7140. Transition mires and quaking bogs; Very wet mires often identified by an unstable 'quaking' surface
- H7150. Depressions on peat substrates of the *Rhynchosporion.*

East Hampshire Hangers SAC

Conservation objectives:

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

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

Qualifying Features:

- H6210. Semi-natural grasslands and scrubland facies: on calcareous substrates (*Festuco-Brometalia*) (important orchid sites); Dry grasslands ad scrublands on chalk or limestone (important orchid sites)*
- H9130. *Asperulo-Fagetum* beech forests; Beech forests on neutral to rich soils
- H9180. *Tilio-Acerion* forests of slopes, screes and ravines; Mixed woodland on base-rich soils associated with rocky slopes*
- H91J0. *Taxus baccata* woods of the British Isles; Yew-dominated woodland*
- S1654. *Gentianella anglica;* Early gentian

Ebernoe Common SAC

Conservation objectives:

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

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

Qualifying Features:

- H9120. Atlantic acidophilous beech forests with *Ilex* and sometimes *Taxus* in the shrub layer (*Quercion robori-petraeae or Ilici-Fagenion*); Beech forests on acid soils
- S1308. *Barbastella barbastellus*; Barbastelle bat
- S1323. *Myotis bechsteinii*; Bechstein's bat

Thursley & Ockley Bogs Ramsar

Ramsar sites do not have Conservation Objectives in the same way as SPAs and SACs. The site overview given on the Information Sheet on Ramsar Wetlands (RIS) is as follows:

Thursley and Ockley Bogs is a valley mire complex and lies within Thursley, Hankley & Frensham Commons SSSI. The mire occurs within a matrix of heathland, where drainage is impeded, and a deep layer of peat has built up from the remains of bog-moss Sphagnum spp. which forms much of the vegetation. Several areas of open water also contribute significantly to the overall diversity of the site, ranging from acidic boggy pools and ditches to large ponds.

Ramsar Criteria:

Ramsar Criteria are the criteria for identifying Wetlands of International Importance. The relevant criteria and ways in which this site meets the criteria are presented in the table below.

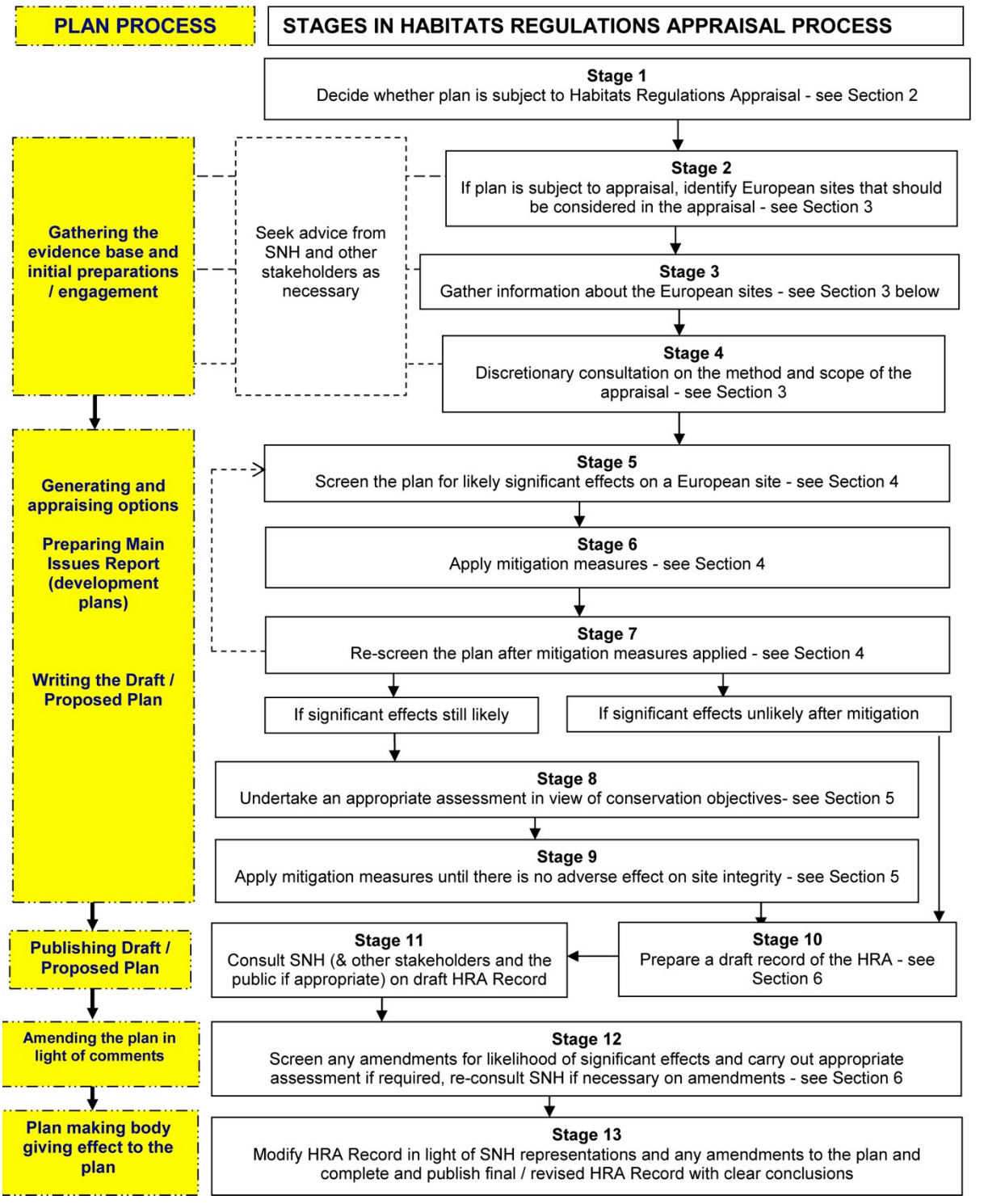
Ramsar Criterion	Description of Ramsar Criterion	Relevant feature of Thursley & Ockley Bogs
2	A wetland should be considered internationally important if it supports vulnerable, endangered, or critically endangered species or threatened ecological communities.	Supports a community of rare wetland invertebrate species including notable numbers of breeding dragonflies.
3	A wetland should be considered internationally important if it supports plant and/or animal species at a critical stage in their life cycles, or provides refuge during adverse conditions.	It is one of few sites in Britain to support all six native reptile species. The site also supports nationally important breeding populations of European nightjar *Caprimulgus europaeus* and woodlark *Lullula arborea*.

APPENDIX B

Flow chart of HRA process.

The 13 Key Stages of the Habitats Regulations Appraisal Process (reproduced from SNH, 2012)

FIGURE 2
13 KEY STAGES OF THE HABITATS REGULATIONS APPRAISAL PROCESS FOR PLANS



APPENDIX C

Policy Screening Categories

In accordance with the SNH (2015) Guidance, each element of the plan was subject to an initial screening to determine whether it needed consideration as part of the HRA. Lepus considered each policy of the NDP in turn and assigned one or more of the following categories:

1. General policy statements or policies that are too general for a meaningful assessment until more detail is known;
2. Projects referred to in, but not proposed by, the plan;
3. No likely significant effects:
    a. Policies to protect the natural or built environment;
    b. Policies that will not lead to change (e.g. design policies);
    c. Policies that make provision for change but which could have no conceivable effect; and
4. Policies that cannot be screened out at this stage.

Further information on these categories can be found in the SNH (2015) Guidance. The results of this initial screening are presented in **Table C.1**. Those policies highlighted in light blue are those that could not be screened out on the basis of the categories given above.

Table C.1: Results of initial screening of policies

Environment		Screening category
FNP1	Design of New Development and Conservation	1
FNP2	Farnham Town Centre Conservation Area and its setting	3a
FNP3	Shop Fronts within Farnham Conservation Area and its setting	3a
FNP4	Advertisements within Farnham Conservation Area and its setting	3a, 3b
FNP5	South Farnham Arcadian Areas	3a
FNP6	Buildings and Structures of Character	3a, 3b
FNP7	Protect and Enhance the Countryside	3a
FNP8	Preventing Coalescence between Farnham and Aldershot; Badshot Lea and Weybourne; Rowledge and Wrecclesham and Rowledge and Frensham	3a
FNP9	Thames Basin Heaths Special Protection Area (SPA)	3a
FNP10	Protect and Enhance Biodiversity	3a
Housing		
FNP11	Housing Site Options	4

FNP12	Small Scale Dwellings	4
FNP13	Building Extensions Within and Outside the Built Up Area Boundary	3c
Business		
FNP14	Land for Business	4
FNP15	Business Site Option	4
FNP16	Rural Buildings for Business and Tourist Uses	1
Farnham Town Centre and Local Centres		
FNP17	The Woolmead	4
FNP18	Farnham Town Centre	3c
FNP19	Local Centres	3c
Leisure and Wellbeing		
FNP20	Public Open Space	3a/b
FNP21	Indoor Sports Facilities	3a
FNP22	Cultural Facilities	3b
Infrastructure		
FNP23	Transport Impact of Development	1
FNP24	Securing Infrastructure	1

LEPUS CONSULTING

LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY

1 Bath Street Cheltenham GL50 1YE

T: 01242 525222

E: enquiries@lepusconsulting.com

www.lepusconsulting.com

CHELTENHAM

Lepus Consulting
1 Bath Street
Cheltenham
Gloucestershire GL50 1YE

t: 01242 525222
w: www.lepusconsulting.com
e: enquiries@lepusconsulting.com