



Submitted to
Farnham Town Council

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Habitat Regulation Assessment: Farnham Neighbourhood Plan Review (2013 – 2032)

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1 Introduction

1.1 Background to the Project

- 1.1.1 AECOM was appointed by Farnham Town Council to produce a report to inform Waverley Borough Council's Habitat Regulations Assessment (including Appropriate Assessment) decision making for the Regulation 15 Farnham Neighbourhood Plan Review January 2019 (henceforth referred to as the Neighbourhood Plan or the 'Plan'). The objective of the assessment was to:
- Identify any aspects of the Neighbourhood Plan Review that would cause an adverse effect on the integrity of Natura 2000 sites, otherwise known as European sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and, as a matter of Government policy, Ramsar sites), either in isolation or in combination with other plans and projects; and,
 - To advise on appropriate policy mechanisms for delivering mitigation where such effects were identified.
- 1.1.2 In this case, the decision was taken to undertake an HRA of the entire Neighbourhood Plan Review (including those elements unchanged from the made Neighbourhood Plan) rather than focus entirely on the review changes.
- 1.1.3 As per the Localism Act 2012¹, Waverley Borough Council made the Farnham Neighbourhood Plan (adopted July 2017) following an independent local referendum. Since that time the Planning Inspector for the Waverley Local Plan Part 1, on behalf of the Secretary of State, advised Waverley Borough Council to increase the overall quantum of housing within Farnham. Due to this Waverley Borough Council updated their Local Plan Part 1: Strategic Policies and Sites in February 2018 to include a further 450 net residential dwellings within Farnham. As a result, Farnham Town Council have drafted a Neighbourhood Plan Review (Regulation 15) to include additional residential provision, including site allocations, to meet this new housing target². The review makes some other amendments to the Neighbourhood Plan, although from an HRA point of view these are minor changes.
- 1.1.4 Farnham Town Council undertook HRA screening of the made Neighbourhood Plan in July 2016 to determine if the Plan would lead to Likely Significant Effects in accordance with Article 6(3) and (4) of the EU Habitats Directive and with the Conservation of Habitats and Species Regulations 2010 (as amended). The HRA concluded no Likely Significant Effects but to draw that conclusion used the mitigation framework that has been devised for the Thames Basin Heaths SPA and that was expressed in the Neighbourhood Plan. Since that time, a European Court of Justice ruling known as the People over Wind ruling has clarified that mitigation measures such as the Thames Basin Heaths avoidance strategy cannot be taken into account when forming a judgment of likely significant effects (i.e. the risk of an effect). Mitigation can only be taken into account when determining if an adverse effect on integrity will actually arise. This second stage of the process is known as appropriate assessment. Much of the net new housing growth within Farnham lies within 5km of the Thames Basin Heaths SPA, and thus within the zone covered by the adopted avoidance strategy. Since mitigation cannot be taken into account when determining likely significant effect, it is therefore impossible to conclude no likely significant effect (i.e. no risk of an effect) from the Neighbourhood Plan Review. As such, this current report not only covers likely significant effects but also contains an appropriate assessment.
- 1.1.5 Appropriate Assessment is not a technical term; it simply means whatever level of further assessment is appropriate once it has been determined that a significant effect cannot be deemed inherently unlikely. In this case there is an accepted, tested and adopted mitigation strategy for the Thames Basin Heaths SPA that applies to all net new housing within 5km of the SPA. The principal purpose of this document is therefore to confirm whether the scale of net new housing development planned within Farnham through the Neighbourhood Plan Review could comply with that strategy in order to mitigate the significant effects.

¹ <http://www.legislation.gov.uk/ukpga/2011/20/contents/enacted> [Accessed: 27/09/2018]

² http://www.waverley.gov.uk/downloads/download/2201/farnham_neighbourhood_plan_-_final_for_referendum [Accessed:27/09/2018]

- 1.1.6 Before considering the role of mitigation, however, it is necessary to consider each policy within the Neighbourhood Plan to confirm which would result in likely significant effects and then to discuss the potential for adverse effects on the integrity of the Thames Basin Heaths SPA in the absence of mitigation.
- 1.1.7 It is also important to take into account the development context set by the Waverley Borough Council Local Plan. As previously described, Waverley Borough Council submitted their Local Plan to central government in July 2017. The policies within a Local Plan are ‘material considerations’ in determining planning applications and the Neighbourhood Plan must generally conform with the strategic policies of that Local Plan. The over-arching strategic Local Plan includes a series of policies facilitating strategic district-wide protection of internationally important wildlife sites such as the Thames Basin Heaths Special Protected Area. The HRA of this Neighbourhood Plan has been undertaken with this fact and overarching policies as a key consideration.

1.2 Legislation

- 1.2.1 The need for Habitats Regulations Assessment is set out within Article 6 of the EC Habitats Directive 1992, and interpreted into British law by the Conservation of Habitats and Species (Various Amendments) (England and Wales) Regulations 2018. The ultimate aim of the Directive is to “*maintain or restore, at favourable conservation status, natural habitats and species of wild fauna and flora of Community interest*” (Habitats Directive, Article 2(2)). This aim relates to habitats and species, not the European sites themselves, although the sites have a significant role in delivering favourable conservation status.
- 1.2.2 In light of the People Over Wind Judgement the Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018 were introduced to confirm that Neighbourhood Plans that identify the need for an appropriate assessment can be ‘*made*’.
- 1.2.3 The Habitats Directive applies the precautionary principle to European sites. Plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the site(s) in question. Plans and projects with predicted adverse impacts on European sites may still be permitted if there are no alternatives to them and there are Imperative Reasons of Overriding Public Interest (IROPI) as to why they should go ahead. In such cases, compensation would be necessary to ensure the overall integrity of the site network.
- 1.2.4 In order to ascertain whether or not site integrity will be affected, a Habitats Regulations Assessment should be undertaken of the plan or project in question:

Box 1: The legislative basis for Appropriate Assessment

Habitats Directive 1992

Article 6 (3) states that:

“Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site’s conservation objectives.”

Conservation of Habitats and Species Regulations 2018 (as amended)

The Regulations state that:

“A competent authority, before deciding to ... give any consent for a plan or project which is likely to have a significant effect on a European site ... shall make an appropriate assessment of the implications for the site in view of that sites conservation objectives... The authority shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site”.

- 1.2.5 Over the years the phrase ‘Habitats Regulations Assessment’ has come into wide currency to describe the overall process set out in the Conservation of Habitats and Species Regulations from screening through to IROPI. This has arisen in order to distinguish the process from the individual

stage described in the law as an 'appropriate assessment'. Throughout this report we use the term Habitats Regulations Assessment for the overall process including the appropriate assessment.

1.3 This Report

- 1.3.1 Chapter 2 of this report explains the process by which the appropriate assessment has been carried out. Chapter 3 details the features for which the Thames Basin Heaths SPA and Wealden Heaths Phase I SPA is designated and identifies potential environmental vulnerabilities. Chapter 4 is an likely significant effects discussion of the policies within the Neighbourhood Plan, and identifies policies that have been identified for further consideration in appropriate assessment. Impact pathways and adverse effects on integrity resulting from the Neighbourhood Plan are discussed in the appropriate assessment in Chapter 5, followed by in-combination assessment in Chapter 6. The overarching conclusion of the HRA is in Chapter 8: Conclusions.

2 Methodology

2.1 Introduction

2.1.1 The HRA has been carried out in the continuing absence of formal central Government guidance, although general EC guidance on HRA does exist³. The Department for Communities and Local Government released a consultation paper on the Appropriate Assessment of Plans in 2006⁴. As yet, no further formal guidance has emerged. However, Natural England has produced its own internal guidance⁵ as has the RSPB⁶. Both of these have been referred to alongside the guidance outlined in section 1.2 in undertaking this HRA. Figure 1 below outlines the stages of HRA according to current draft CLG guidance. The stages are essentially iterative, being revisited as necessary in response to more detailed information, recommendations and any relevant changes to the plan until no significant adverse effects remain.

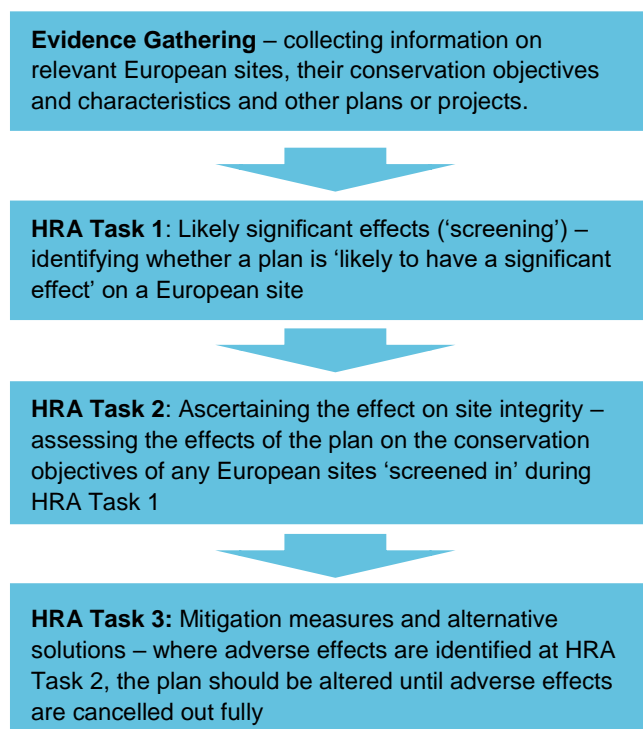


Figure 1: Four Stage Approach to Habitats Regulations Assessment. Source CLG, 2006.

³ European Commission (2001): Assessment of plans and projects significantly affecting Natura 2000 Sites: Methodological Guidance on the Provisions of Article 6(3) and 6(4) of the Habitats Directive.

⁴ CLG (2006) Planning for the Protection of European Sites, Consultation Paper

⁵ http://www.ukmpas.org/pdf/practical_guidance/HRGN1.pdf

⁶ Dodd A.M., Cleary B.E., Dawkins J.S., Byron H.J., Palframan L.J. and Williams G.M. (2007) *The Appropriate Assessment of Spatial Plans in England: a guide to why, when and how to do it*. The RSPB, Sandy.

2.2 HRA Task 1 - Likely Significant Effects (LSE)

2.2.1 Following evidence gathering, the first stage of any Habitats Regulations Assessment is a Likely Significant Effect (LSE) test - essentially a risk assessment to decide whether the full subsequent stage known as Appropriate Assessment is required. The essential question is:

"Is the Plan, either alone or in combination with other relevant projects and plans, likely to result in a significant effect upon European sites?"

2.2.2 The objective is to 'screen out' those plans and projects that can, without any detailed appraisal, be said to be unlikely to result in significant adverse effects upon European sites, usually because there is no mechanism for an adverse interaction with European sites.

2.2.3 In this case, the HRA of the adopted Waverley Local Plan identifies that all net new housing within 5km of the Thames Basin Heaths SPA will have an adverse effect on the designation through recreational pressure without mitigation, which will therefore lead to likely significant effects. Given this, it is already understood that appropriate assessment is required, focused explicitly on recreational pressure at Thames Basin Heaths SPA. However, it is still necessary to go through the policies within the Neighbourhood Plan to determine which will cause this likely significant effect.

2.3 HRA Task 2 – Appropriate Assessment

2.3.1 Where it is determined that a conclusion of 'no likely significant effect' cannot be drawn, the analysis proceeds to the next stage of HRA known as Appropriate Assessment. Case law has clarified that 'Appropriate Assessment' is not a technical term. In other words, there are no particular technical analyses, or level of technical analysis, that are classified by law as belonging to appropriate assessment effects. This is a judgment to be made in each case although there is an implication that appropriate assessment should consider the issues in more detail than at the likely significant effects stage and recent case law has confirmed that mitigation measures can only be taken into account during appropriate assessment.

2.3.2 The level of detail in land use plans concerning developments that will be permitted under the plans will never be sufficient to make a detailed quantification of adverse effects. Therefore, we have again taken a precautionary approach (in the absence of more precise data) assuming as the default position that if an adverse effect cannot be confidently ruled out, avoidance or mitigation measures must be provided. This is in line with the Department for Communities and Local Government guidance that the level of detail of the assessment, whilst meeting the relevant requirements of the Habitats Regulations, should be 'appropriate' to the level of plan or project that it addresses (see Appendix A for a summary of this 'tiering' of assessment).

2.3.3 In this case, the core of the appropriate assessment consists of determining the extent to which growth in Farnham will be able to comply with Waverley Borough Council's adopted Thames Basin Heaths Avoidance Strategy⁷ and the associated policies in the Waverley Local Plan (notably Policy NE3 Thames Basin Heaths Special Protection Area).

2.4 Other Plans and Projects That May Act In Combination

2.4.1 It is a requirement of the Regulations that the impacts of any land use plan being assessed are not considered in isolation but in combination with other plans and projects that may also be affecting the European site(s) in question.

2.4.2 For the purposes of this assessment, we have determined that, due to the nature of the identified impacts, the key other plans and projects with potential for in combination likely significant effects are those schemes that can result in further development pressures upon the Thames Basin Heaths SPA. For the purpose of this assessment, the following documents will be considered in combination with the Neighbourhood Plan as these provide for strategic levels of development within the Thames Basin Heaths SPA catchment:

- Hart Local Plan: Proposed Submission version 2016-2032
- Crondall Parish Neighbourhood Plan: Pre-submission survey 2017-2032⁸
- Waverley Local Plan Part 1 : Strategic Policies and Sites (adopted February 2018)⁹;

⁷ Thames Basin Heaths SPA Avoidance Strategy: Waverley Borough Council (Reviewed 2016)

⁸ <http://www.cron-dall-pc.gov.uk/neighbourhood-plan> [Accessed: 18/09/2018]

- Wokingham Borough Local Development Framework Adopted Core Strategy Development Plan Document (adopted January 2010)¹⁰;
- Draft Bracknell Forest Council Local Plan (February 2018)¹¹;
- Bracknell Forest Council Core Strategy (adopted 2008)¹²;
- Bracknell Forest Council Site Allocation Local Plan (adopted 2013)¹³;
- Rushmoor Core Strategy (adopted 2011)¹⁴;
- Rushmoor Proposed Submission Local Plan (June 2017)¹⁵;
- Guildford Borough Proposed Submission Local Plan (2017)¹⁶;
- Surrey Heath Core Strategy & Development Management Policies 2011- 2028. Adopted 2012¹⁷;
- Surrey Heath Draft Local Plan 2016 to 2032 Issues Options and Preferred Options (June 2018)¹⁸
- Elmbridge Core Strategy July 2011¹⁹;
- Elmbridge Development management Plan (adopted 2015)²⁰
- Woking Borough Local Development Document Woking Core Strategy (adopted October 2012)²¹

2.4.3 When undertaking this part of the assessment it is essential to bear in mind the principal intention behind the legislation i.e. to ensure that those projects or plans which in themselves have minor impacts are not simply dismissed on that basis, but are evaluated for any cumulative contribution they may make to an overall significant effect. In practice, in combination assessment is therefore of greatest relevance when the plan would otherwise be screened out because its individual contribution is inconsequential.

⁹ http://www.waverley.gov.uk/info/1004/planning_policy/247/local_plan_part_1_strategic_policies_and_sites/1 [accessed 06/06/2018]

¹⁰ <http://www.wokingham.gov.uk/planning/planning-policy/local-plan-and-planning-policies/> [accessed 06/06/2018]

¹¹ <http://consult.bracknell-forest.gov.uk/file/4868307> [accessed 18/09/2018]

¹² <https://www.bracknell-forest.gov.uk/planning-and-building-control/planning/planning-policy/development-plan/core-strategy> [accessed 18/09/2018]

¹³ <https://www.bracknell-forest.gov.uk/planning-and-building-control/planning/planning-policy/development-plan/site-allocations-local-plan> [accessed 18/09/2018]

¹⁴ <https://www.rushmoor.gov.uk/CHttpHandler.ashx?id=5447&p=0> [accessed 18/09/2018]

¹⁵ <http://consult.rushmoor.gov.uk/file/4566116> [accessed 18/09/2018]

¹⁶ <http://www.guildford.gov.uk/newlocalplan/proposedsubmission> [accessed 18/09/2018]

¹⁷ <http://www.surreyheath.gov.uk/residents/planning/planning-policy/surrey-heath-local-plan/core-strategy-and-development-management> [accessed 18/09/2018]

¹⁸ <https://consult.surreyheath.gov.uk/consult.ti/LPIO2018/viewCompoundDoc?docid=9916468> [accessed 18/09/2018]

¹⁹ <http://www.elmbridge.gov.uk/EasySiteWeb/GatewayLink.aspx?allid=736> [accessed 18/09/2018]

²⁰ <http://www.elmbridge.gov.uk/EasySiteWeb/GatewayLink.aspx?allid=822> [accessed 18/09/2018]

²¹ <http://www.woking2027.info/corestrategy/adoptedcorestrategy> [accessed 18/09/2018]

3 European Site Information

3.1 Thames Basin Heaths SPA

Introduction

- 3.1.1 Thames Basin Heaths Special Protection Area (SPA) consists of a number of fragments of lowland heathland scattered across Surrey, Hampshire and Berkshire. It is predominantly dry and wet heath but also includes areas of deciduous woodland, gorse scrub, acid grassland and mire, as well as associated conifer plantations. Around 75% of the SPA has open public access being either common land or designated as open country under the Countryside and Rights of Way Act 2000. The SPA consists of 13 Sites of Special Scientific Interest. Three of the SSSIs are also designated as part of the Thursley, Ash, Pirbright and Chobham Special Area of Conservation (which is located more than 5km from Hart District boundary).
- 3.1.2 Bramshill SSSI and Hazeley Heath SSSI both lie within Hart District, along with the majority of Castle Bottom to Yateley and Hawley Commons SSSI and the western part of Bourley and Long Valley SSSI.
- 3.1.3 The location of the Thames Basin Heaths has resulted in the designated site being subject to high development pressure. English Nature (now Natural England) published a Draft Delivery Plan for the Thames Basin Heaths SPA in May 2006, partly in response to the European Court of Justice ruling of October 2005. This is updated by the 'Thames Basin Heaths Special Protection Delivery Framework' published by the Thames Basin Heaths Joint Strategic Partnership Board in January 2009. These documents aim to allow a strategic approach to accommodating development by providing a method through which local authorities can meet the requirements of the Habitats Regulations through avoidance and mitigation measures.
- 3.1.4 In addition Hart District Council has produced an 'Interim Avoidance Strategy for the Thames Basin Heaths Special Protection Area'.

Reasons for designation

- 3.1.5 Thames Basin Heaths SPA qualifies under Article 4.1 of the Birds Directive (79/409/EEC) by supporting populations of European importance of the following species listed on Annex I of the Directive:
- 3.1.6 During the breeding season:
- Nightjar *Caprimulgus europaeus*
 - Woodlark *Lullula arborea*
 - Dartford Warbler *Sylvia undata*
- 3.1.7 These species nest on or near the ground and as a result are susceptible to predation and disturbance.

Potential environmental vulnerabilities

- Appropriate Management
- Management of disturbance during the breeding season (March to July)
- Minimal air pollution
- Absence or control of urbanisation effects, such as fires and introduction of invasive non-native species
- Maintenance of appropriate water levels

- Maintenance of water quality

Conservation Objectives²²

- 3.1.8 With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features' listed below), and subject to natural change;
- 3.1.9 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 disturbance 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.

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

Introduction

- 3.2.1 Wealden Heaths Phase I consists of several commons that are underpinned by the Thursley, Hankley and Frensham Commons SSSI. The National Nature Reserve is managed by Natural England and Frensham and Witley Commons are managed by the National Trust. A large part of the site is owned by the MoD (Hankley Common and Ockley Common), being regularly used for military activities and informal recreation. All components of this SPA lie within Waverley Borough.
- 3.2.2 This extensive site represents some of the finest remaining heathland on the Lower Greensand in Southern England. The valley mire on Thursley Common is regarded as one of the best in Britain. The site is of national importance for its bird, reptile and invertebrate populations.
- 3.2.3 Hankley Common has the most extensive tracts of dry heath, but the habitat is also well represented on the other Commons. Peatland is of greatest value on Thursley Common, but on the other commons is less extensive but still important. The site is one of the richest for birds in Southern England. Breeding birds specifically associated with the heathland include woodlark, Dartford warbler, and nightjar.

Reasons for designation

The Wealden Heaths Phase I (Thursley, Hankley and Frensham Commons) SPA qualifies under Article 4.1 of the Birds Directive (79/409/EEC) by supporting breeding populations of European importance of the following species listed on Annex I of the Directive:

- Nightjar *Caprimulgus europaeus*
 - Woodlark *Lullula arborea*
 - Dartford warbler *Sylvia undata*
- 3.2.4 These species nest on or near the ground and as a result are susceptible to predation and disturbance.
- 3.2.5 Thursley, Ash, Pirbright and Chobham Special Area of Conservation is designated for three Annex I habitats.
- 3.2.6 The qualifying Annex 1 habitats are:
- Wet heathland with cross-leaved heath
 - Dry heaths
 - Depressions on peat substrates
- 3.2.7 Thursley and Ockley Bog Ramsar site qualifies under two of the nine Ramsar criteria.

²² Natural England (2014) European Site Conservation Objectives for River Mease Special Area of Conservation Site Code: UK0030258

Table 9: Thursley and Ockley Bog Ramsar site criteria

| Ramsar criterion | Description of Criterion | Thursley & Ockley Bogs |
|------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2 | A wetland should be considered internationally important if it supports vulnerable, endangered, or critically endangered species or threatened ecological communities. | The site 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 populations of plant and/or animal species important for maintaining the biological diversity of a particular biogeographic region. | It is one of the few sites in Britain to support all six native reptile species. The site also supports nationally important breeding populations of European nightjar <i>Caprimulgus europaeus</i> and woodlark <i>Lullula arborea</i> . |

Potential environmental vulnerabilities

- Appropriate management
- Managed recreational pressure
- Minimal air pollution
- Absence or control of urbanisation effects, such as fires and introduction of invasive non-native species
- Maintenance of appropriate water levels
- Maintenance of water quality
- Management of disturbance during breeding season (March to July) (SPA and Ramsar sites)

Conservation objectives²³

3.2.8 *‘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.’*

²³ <http://publications.naturalengland.org.uk/publication/5735025425252352>

4 Likely Significant Effects of the Farnham Neighbourhood Plan Review

- 4.1.1 According to Policy ALH1 of the adopted Waverley Local Plan Part 1, a minimum of 2,780 dwellings must be delivered in Farnham over the period 2013 to 2032. The Neighbourhood Plan Review therefore aims for 3,005 dwellings. Of these:
- 445 have been completed and 1,163 have planning permission according to Para 5.14 2 of the Neighbourhood Plan Review and have therefore already been allocated to the existing SANG at Farnham Park or, in one case, a bespoke on-site SANG. Since these already have planning permission they do not need further discussion;
 - 1,397 do not have planning permission according to Para 5.160 of the Neighbourhood Plan Review. Of these, 922 are allocated to development sites while 475 constitute an allowance for windfall (i.e. development on sites that are too small to specifically allocate).
- 4.1.2 This section represents an initial assessment of each site allocation and policy in the Farnham Neighbourhood Plan Review (2019). The Neighbourhood Plan Review contains no new policies and none have been deleted. The housing policy (FNP14) has been amended to insert additional housing sites.. Some of the other text or policies have been slightly amended as follows:
- Waverley Abbey Conservation Area: There is more text about Waverley Abbey Conservation Area which was inadvertently omitted in the Made NP;
 - The Built Up Area Boundary has been revised to incorporate two sites granted consent at appeal;
 - Areas of High Landscape Value and Sensitivity: Map E has been amended to show revised Areas of High Landscape Value and Sensitivity based on the Farnham Landscape Character Assessment, July 2018;
 - Suitable Alternative Natural Greenspace (SANG): The European Special Protection Areas section updates the remaining SANG capacity at Farnham Park and includes the new SANG sites available at Tongham Road, Runfold and the Runfold South Quarry Site;
 - Policy FNP12 Thames Basin Heaths Special Protection Area (SPA) and new Map G have been amended/ created to reference these two new SANG sites.
- 4.1.3 With the exception of those policies intended to deliver housing, the HRA of the made Neighbourhood Plan was able to conclude no likely significant effect as a result of any of the remaining Neighbourhood Plan policies, alone or in combination with other plans or projects, without needing to rely on mitigation. The changes listed above would not introduce any likely significant effects. As such it is possible to reaffirm the conclusion of the HRA of the made Neighbourhood Plan and conclude that none of the policies in the Neighbourhood Plan Review will result in likely significant effects except those which are intended to deliver net new housing in Farnham.
- 4.1.4 The remainder of this section therefore focusses upon the housing allocations in the Neighbourhood Plan. Green shading in the final column indicates that the proposed development site has been deemed not to lead to a likely significant effect on any European sites due to the absence of any mechanism for an adverse effect. Orange shading indicates that a pathway of impact potentially exists and further discussion is therefore required. For the purposes of this assessment a 5km zone of influence is used around each Special Protection Area (Thames Basin Heaths SPA and Wealden Heaths Phase I SPA). A 5km zone is chosen because a) this is the zone within which a series of HRAs have identified that all net new housing will have an adverse effect on the integrity of Thames Basin Heaths SPA without mitigation and b) the HRA of Waverley Local Plan Part 1 records that Natural England recommended during preparation of that HRA that the Council undertake a project-level HRA on all larger developments located within 5km of Wealden Heaths Phase I SPA.

Table 1: Analysis of Sites without planning permission covered by the Farnham Neighbourhood Plan Review (Regulation 15)

| Site allocation | Brief summary | Screening outcome |
|--------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Part of SSE Farnham depot, Lower Weybourne Lane and adjoining land | This site has spare capacity for 100 residential dwellings. The existing site use is of a large depot currently in use by Parcel Force. Much of the site is concreted, however, the site is bounded by mature hedgerows and trees and towards the south of the site is vacant scrub habitat. | <p>Likely significant effect</p> <p>This site is located 2km south-east of the Thames Basin Heaths SPA and is therefore within the SPA 5km Zone of Influence. Since the site is classified as brownfield there are no issues of habitat loss. However, it is long standing knowledge that the Thames Basin Heaths SPA has been operating at full visitor capacity for some time. As such, there are significant problems associated with recreational pressures and the health of the sites local biodiversity. In order to prevent additional pressure upon the Thames Basin Heaths SPA additional Suitable Alternative Natural Greenspaces (SANG) and/ or maintenance tariff payments would be required for this development.</p> <p>This site is located 6km north of the Wealden Heaths Phase 1 SPA and is therefore located outside of the 5km SPA influence zone. As such no likely significant effects are expected on this site.</p> |
| Land at Little Acres Nursery and south of Badshot Lea | This site has been proposed for the development of 125 dwellings. The current land use of the site is of a plant nursery. There are a number of mature tree lines that are located towards the north and west of the site. Much of the site consists of glass greenhouses and associated gardening equipment. | <p>Likely significant effect</p> <p>This site allocation is located 2.9km south-east of the Thames Basin Heaths SPA and is therefore within the SPA 5km Zone of Influence. Due to issues relating to recreational pressures and biodiversity disturbance, which is previously described, upon the SPA, additional Suitable Alternative Natural Greenspaces (SANG) and/ or maintenance tariff payments would be required for this development.</p> <p>This site is located 5.4km north of the Wealden Heaths Phase 1 SPA and is therefore located outside of the 5km SPA influence zone. As such no likely significant effects are expected on this site.</p> |
| University for the Creative Arts, Falkner Road | The University for the Creative Arts, located north of Falkner Road, is a thriving campus for students and as such the University has plans of expansion. Approximately 252 student units (equating to 75 dwellings) are proposed for development within the campus of the University to replace the current main hall accommodation and to clear the small patch of trees located to the south of the hall. | <p>Likely significant effect</p> <p>Again, this site is located only 2.3km south of the Thames Basin Heaths SPA and is therefore within the SPA 5km Zone of Influence. Due to issues relating to recreational pressures and biodiversity disturbance, which is previously described, upon the SPA. Additional Suitable Alternative Natural Greenspaces (SANG) and/ or maintenance tariff payments would be required for this development.</p> <p>This site is located 5.3km north-west of the Wealden Heaths Phase 1 SPA and is therefore located outside of the 5km SPA influence zone. As such no likely significant effects are expected on this site.</p> |
| Cobgates, Falkner Road | This site has capacity for 40 residential dwellings. The existing site use is of a recently closed home for old people. The land is listed as brownfield and is located outside of Farnham Conservation Area. | <p>Likely significant effect</p> <p>This site is located 2.4km south of the Thames Basin Heaths SPA and is therefore within the SPA 5km Zone of Influence. Since the site is located just north of the town centre and classified as brownfield there are no issues of habitat loss. However, it is long standing knowledge that the Thames Basin Heaths SPA has been operating at full visitor capacity for some time. As such, there are significant problems associated with recreational pressures and the health of the sites local biodiversity. In order to prevent additional pressure upon the Thames Basin Heaths SPA additional Suitable Alternative Natural Greenspaces (SANG) and/ or maintenance tariff payments would be required for this development.</p> <p>This site is also located 5.7km north of the</p> |

| Site allocation | Brief summary | Screening outcome |
|-------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | | Wealden Heaths Phase I SPA and is therefore outside of the 5km influence zone for this SPA. As such no likely significant effects are expected on this site. |
| Centrum Business Park, East Street | This site is proposed for the development of 150 dwellings. The existing site use is primarily in retail use with retail including car parking facilities and fitness centres. This site is close to the Brightwells Farnham Regeneration Scheme; development proposals include the creation of a public square, shops, residential areas and car parking facilities. | <p>Likely significant effect</p> <p>This site allocation is located 2.5km south of the Thames Basin Heaths SPA and is therefore within the SPA 5km Zone of Influence. Due to issues relating to recreational pressures and biodiversity disturbance upon the SPA as previously described, additional Suitable Alternative Natural Greenspaces (SANG) and/ or maintenance tariff payments would be required for this development.</p> <p>This site is also located 5.3km north of the Wealden Heaths Phase I SPA and is therefore outside of the 5km influence zone for this SPA. As such no likely significant effects are expected on this site.</p> |
| Kimbers Lane | This site is located towards the east of Farnham town centre. The proposals for the site are for 20 residential dwellings. Located on site is the former Pump House that should be retained within the development. However, if this is not possible it is the council's view that the character of this building in incorporated into the design of the development. | <p>Likely significant effect</p> <p>This site is located 2.4km south of the Thames Basin Heaths SPA and is therefore within the SPA 5km Zone of Influence. Due to issues relating to recreational pressures and biodiversity disturbance upon the SPA additional Suitable Alternative Natural Greenspaces (SANG) and/ or maintenance tariff payments would be required for this development.</p> <p>This site is also located 5.2km north of the Wealden Heaths Phase I SPA and is therefore outside of the 5km SPA influence zone. As such no likely significant effects are expected on this site.</p> |
| Surrey Sawmill, Wrecclesham Hill | This site is located south-west of Farnham with the proposals for 20 residential dwellings. The existing site use is of industrial units and car parking facilities. | <p>Likely significant effect</p> <p>This site is located 4.95km from the Thames Basin Heaths SPA. The site therefore falls within the 5km zone of influence for the Thames Basin Heaths SPA. Due to issues relating to recreational pressures and biodiversity disturbance upon the SPA additional Suitable Alternative Natural Greenspaces (SANG) and/ or maintenance tariff payments would be required for this development.</p> <p>Furthermore, this development site is also located 3.9km from the Wealden Heaths Phase I SPA and therefore is located within the 5km Zone of Influence of that site. As such, likely significant effects in the form of recreational pressure and disturbance on the Wealden Heaths Phase I SPA cannot be dismissed.</p> |
| Land west of Green Lane, Badshot Lea | Gross Area: 3.5ha. Approximate density: 35dph. Approximate capacity: 105 dwellings) (in accordance with Planning Application Ref. WA/2015/2283) | <p>Likely significant effect</p> <p>The site is located within 1.6km of the Thames Basin Heaths SPA and is therefore within the SPA 5km Zone of Influence. Again, due to issues relating to recreational pressures and biodiversity disturbance, which is previously described, upon the SPA additional Suitable Alternative Natural Greenspaces (SANG) and/ or maintenance tariff payments would be required for this development.</p> <p>The site is also located 6km north of the Wealden Heaths Phase I SPA and is therefore outside of the 5km SPA influence zone. As such no likely significant effects are expected on this site.</p> |
| Land between Hale Road and Guildford Road | Gross Area: 0.2ha. Approximate density: 50dph. Approximate capacity: 10 dwellings | <p>Likely significant effect</p> <p>This site is located within 3km of the Thames Basin Heaths SPA and is therefore within the SPA 5km Zone of Influence. Again, due to issues</p> |

| Site allocation | Brief summary | Screening outcome |
|------------------------------------------|-------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | | <p>relating to recreational pressures and biodiversity disturbance, which is previously described, upon the SPA additional Suitable Alternative Natural Greenspaces (SANG) and/ or maintenance tariff payments would be required for this development.</p> <p>The site is also located 5.2km north of the Wealden Heaths Phase I SPA and is therefore outside of the 5km SPA influence zone. As such no likely significant effects are expected on this site.</p> |
| <p>Colemans yard, Wrecclesham Road</p> | <p>Gross Area: 0.24ha. Approximate density: 50dph. Approximate capacity: 10 dwellings</p> | <p>Likely significant effect</p> <p>This site is located within 4km of the Thames Basin Heaths SPA and is therefore within the SPA 5km Zone of Influence. Again, due to issues relating to recreational pressures and biodiversity disturbance, which is previously described, upon the SPA additional Suitable Alternative Natural Greenspaces (SANG) and/ or maintenance tariff payments would be required for this development.</p> <p>The site is also located 4.4km north of the Wealden Heaths Phase I SPA and is therefore located within the 5km Zone of Influence of that site. As such, likely significant effects in the form of recreational pressure and disturbance on the Wealden Heaths Phase I SPA cannot be dismissed.</p> |
| <p>West of Switchback Lane, Rowledge</p> | <p>Gross Area: 2.3ha. Approximate density: 5dph. Approximate capacity: 10 dwellings</p> | <p>Likely significant effect</p> <p>This site is located 5.7km from the Thames Basin Heaths SPA and therefore within the SPA 5-6km Zone of Influence. Since the development proposals for 10 dwellings do not exceed the critical value of 50 residential dwelling within the 5-7km catchment of the Thames Basin Heaths no likely significant effects are expected for this SPA.</p> <p><u>However</u>, this development site is also located 2.5km from the Wealden Heaths Phase I SPA and therefore is located within the 5km Zone of Influence of that site. As such, likely significant effects on the Wealden Heaths Phase I SPA cannot be dismissed</p> |
| <p>Coxbridge Farm, off West Street</p> | <p>Gross Area: 12.36ha. Approximate density: 30dph. Approximate capacity: 350 dwellings</p> | <p>Likely significant effect</p> <p>This site is located within 3km of the Thames Basin Heaths SPA and is therefore within the SPA 5km Zone of Influence. Again, due to issues relating to recreational pressures and biodiversity disturbance, which is previously described, upon the SPA additional Suitable Alternative Natural Greenspaces (SANG) and/ or maintenance tariff payments would be required for this development.</p> <p>The site is also located 4.9km north of the Wealden Heaths Phase I SPA and is therefore is located within the 5km Zone of Influence of that site. As such, likely significant effects in the form of recreational pressure and disturbance on the Wealden Heaths Phase I SPA cannot be dismissed.</p> |

4.1.5 Four of the housing allocations made within the Revised Farnham Neighbourhood Plan are expected to have a likely significant effect on Wealden Heaths Phase I SPA, while all but one (West of Switchback Lane, Rowledge) are expected to have likely significant effects on the Thames Basin Heaths SPA. Given the assessment above, Policy FNP14 (Housing Site Selection) is the focus of the appropriate assessment, discussed in more detail in the following chapter.

5 Appropriate Assessment

5.1 Urbanisation

5.1.1 Urbanisation impacts result from increased populations within close proximity to sensitive European sites. The detail of the impacts is distinct from the trampling, disturbance and dog-fouling that results specifically from recreational activity (considered in the subsequent section relating to Recreational Pressure and Disturbance). The list of urbanisation impacts can be extensive, but core impacts can be singled out:

- Increased fly-tipping
- Cat predation
- Uncontrolled fires

5.1.2 After extensive research, Natural England and its partners produced the Thames Basin Heaths Special Protection Area Delivery Framework which made recommendations for accommodating development while also protecting the interest features of the European site. This included the recommendation of implementing a series of zones within which varying constraints would be placed upon development. This strategic requirement was included within Policy NRM6 of the South East Plan saved overarching policy and the Thames Basin Heaths Special Protection Area Delivery Framework agreed by all the affected local authorities and Natural England. These set out the principles of avoidance and mitigation to avoid harm to the TBHSPA arising from new housing development. These measures include:

- Directing development to those areas where potential adverse effects can be avoided without the need for mitigation measures;
- The establishment of a 400 metre buffer zone around the TBHSPA within which no net new housing development will be supported;
- The provision of Suitable Alternative Natural Greenspace (SANG); and,
- Contributions towards Strategic Access Management and Monitoring (SAMM) measures.

5.1.3 Concerning aspects of urbanisation (particularly predation of the chicks of ground-nesting birds by domestic cats) was determined at 400m from the SPA boundary. The delivery plan concluded that the adverse effects of any residential development located within 400m of the SPA boundary could not be mitigated in part because this was the range over which cats and people could be expected to roam as a matter of routine and there was no realistic way of restricting their movements, and as such, no new housing should be located within this zone.

5.1.4 Farnham Neighbourhood Plan Policy FNP12: Thames Basin Heaths Special Protection Area states:

5.1.5 *'Within 400m of the SPA boundary, no net new residential development will be permitted, as mitigation measures are unlikely to be capable of protecting the integrity of the SPA.'*

5.1.6 None of the newly proposed development sites within Farnham lie within the designated 400m Inner Exclusion Zone of the Thames Basin Heaths SPA or Wealden Heaths Phase I SPA. The additional sites to Farnham therefore comply with the prohibition on net new housing development within this area. As such, this issue does not require further discussion.

5.2 Air Quality

5.2.1 Traffic-related air quality effects on the Thames Basin Heaths SPA and Wealden Heaths Phase I SPA, in combination with other plans and projects, were considered for all expected growth across the Waverley Borough (including the additional requirement for Farnham) in the HRA of the adopted Waverley Local Plan and the subsequent HRAs of the Main Modifications to that Local Plan, culminating in the Habitats Regulations Assessment Addendum Response to Inspector's Question 7 (November 2017). The HRAs concluded that there would be no adverse effect on both SPAs from traffic growth across Waverley Borough, even 'in combination' with growth in surrounding authorities. Since that analysis considered all housing and employment planned across Waverley Borough

including the additional requirement for Farnham, the conclusions of that HRA can be carried forward to the additional growth in the Farnham Neighbourhood Plan.

5.3 Recreational Pressure and Disturbance

5.3.1 Recreational use of a European site has the potential to:

- Prevent appropriate management or exacerbate existing management difficulties;
- Cause damage through erosion and fragmentation;
- Cause eutrophication as a result of dog fouling; and
- Cause disturbance to sensitive species, particularly ground-nesting birds and (where relevant) wintering wildfowl.

5.3.2 Different types of European sites are subject to different types of recreational pressures and have different vulnerabilities. Studies across a range of species have shown that the effects from recreation can be complex. The Thames Basin Heaths SPA is an important recreational site for a variety of different major settlements within the SPA 5km influence zone, these include: Farnham, Farnborough, Fleet, Hartley Wintney and parts of Yateley.

5.3.3 It should be emphasised that recreational use is not inevitably a problem. Many European sites also contain nature reserves managed for conservation and public appreciation of nature. Parts of the Wealden Heaths Phase II SPA, for example, are managed by the National Trust. At these sites, access is encouraged and resources are available to ensure that recreational use is managed appropriately.

5.4 Mechanical/Abrasive Damage and Nutrient Enrichment

5.4.1 Most types of terrestrial European site can be affected by soil compaction and erosion, which can arise as a result of visits by walkers, cyclists, horse-riders and users of off-road vehicles. Dog walkers adversely impact sites through nutrient enrichment via dog fouling and also have potential to cause greater disturbance to fauna as dogs are less likely to keep to marked footpaths and move more erratically. Motorcycle scrambling and off-road vehicle use can cause serious erosion, as well as disturbance to sensitive species.

5.4.2 The Thames Basin Heaths SPA and Wealden Heaths Phase I SPA within Farnham are internationally designated sites for species that could be adversely affected by the impacts of excessive trampling and erosion to their supporting habitats. Direct mechanical trampling and nutrient enrichment are both more subtle and reversible effects than disturbance of nesting bird populations.

5.5 Disturbance

5.5.1 Concern regarding the effects of disturbance on birds stems from the fact that they are expending energy unnecessarily and the time they spend responding to disturbance is time that is not spent feeding. Disturbance therefore risks increasing energetic output while reducing energetic input, which can adversely affect the 'condition' and ultimately survival of the birds. In addition, displacement of birds from one feeding site to others can increase the pressure on the resources available within the remaining sites, as they have to sustain a greater number of birds.

5.5.2 Human activity can affect birds either directly (e.g. through causing them to flee) or indirectly (e.g. through damaging their habitat). The most obvious direct effect is that of immediate mortality such as death by shooting, but human activity can also lead to behavioural changes (e.g. alterations in feeding behaviour, nest abandonment, avoidance of certain areas etc.) and physiological changes (e.g. an increase in heart rate) that, although less noticeable, may ultimately result in major population-level effects by altering the balance between immigration/birth and emigration/death.

5.5.3 The factors that influence a species response to a disturbance are numerous, but the three key factors are species sensitivity, proximity of disturbance sources and timing/duration of the potentially disturbing activity. The most detailed consideration of the link between relative recreational pressure on European sites and damage to interest features has been carried out with regard to the Thames Basin Heaths SPA.

Thames Basin Heaths SPA

- 5.5.4 After extensive research, Natural England and its partners produced the Thames Basin Heaths Special Protection Area Delivery Framework which made recommendations for accommodating development while also protecting the interest features of the European site. This included the recommendation of implementing a series of zones within which varying constraints would be placed upon development (see South East Plan Policy NRM6). The zones relating to recreational pressure extended to 5km (as this was determined from visitor surveys to be the principal recreational catchment for this European site). At distances from the SPA of 400m-5km the Delivery Framework advises that development projects should be required to contribute toward provision of Suitable Alternative Natural Greenspace (SANG) and toward access management to the SPA. Additionally, Waverley Borough Council's Thames Basin Heaths Special Protection Area Delivery Framework details that any proposals for residential dwellings site allocations located between within 5km of the Thames Basin Heaths SPA will need to '*provide or contribute to the provision of avoidance measures*'.
- 5.5.5 Where increased recreational use is predicted to cause adverse impacts on a site, avoidance and mitigation should be considered. Avoidance of recreational impacts at European sites involves location of new development away from such sites; Local Plans provide the mechanism for this. Where avoidance is not possible, mitigation will usually involve a mix of access management, habitat management and provision of alternative recreational space.
- 5.5.6 The Farnham Neighbourhood Plan Review intends to deliver 3,005 new dwellings (including the additional 450 dwellings allocated in the Local Plan) in the parish over the period 2013-2032 many of the site allocations for these dwellings are within 2km of the SPA. At an average occupancy rate of 2 people per dwelling (the occupancy rate of housing in Waverley Borough as of May 2018) net residents to Farnham within the catchment of the SPA would equate to c. 6,010 new residents. The actual number of additional visitors to the SPA would be smaller since not all new residents will visit the SPA. The equivalent of 72 dwellings constitute student accommodation, and a further 20 dwellings are more than 5km from the Thames Basin Heaths SPA. In addition, a small proportion of the windfall sites (estimated to be approximately 10%) will be located outside the 5km catchment.
- 5.5.7 All but one site allocation outlined within the Farnham Neighbourhood Plan Review lies within 5km of the Thames Basin Heaths SPA. It is therefore concluded that in the absence of mitigation this site allocation would result in an adverse effect on the integrity of the Thames Basin Heaths SPA when considered in isolation. Land at Switchback Lane, Rowledge lies more than 5km from the SPA and falls below the 50 dwelling threshold that has been identified within the Thames Basin Heaths avoidance strategy as triggering an adverse effect on the SPA from the 5-7km zone.

Wealden Heaths Phase I SPA

- 5.5.8 Four sites lie within the 5km influence zone of this SPA: Colemans yard, Wrecclesham Road, Coxbridge Farm, off West Street, Surrey Sawmill, Wrecclesham Hill and West of Switchback Lane, Rowledge. The Colemans yard, Wrecclesham Road, Coxbridge Farm and Surrey Sawmill sites will be mitigated anyway through delivery of SANG, since they lie within 5km of the Thames Basin Heaths SPA and the SANG will be much closer to the development sites than either SPA will be. This leaves West of Switchback Lane, Rowledge (10 dwellings), which will not deliver any mitigation for Thames Basin Heaths as it is a small site located more than 5km away. Clearly a 10 dwelling site will not result in adverse effects on integrity itself. Therefore the next chapter considers effects in combination with other plans and projects.
- 5.5.9 Even though individual plans may only result in a small impact, when combined with a large number of other plans which propose to deliver housing within 5km of the SPA over the same time period, large 'in combination' effects are likely to arise. Because of this, the Conservation of Habitats and Species Regulations 2018 (as amended) specifically requires an appropriate assessment to also consider impacts 'in combination' with other projects and plans. The following section thus discusses Farnham Neighbourhood Plan's contribution to this 'in combination' effect on the Thames Basin Heaths SPA and Wealden Heaths Phase I SPA.

6 In Combination Assessment of Thames Basin Heaths SPA and Wealden Heaths Phase I SPA

6.1.1 Impact pathways that have potential to link to the Neighbourhood Plan and to act in-combination with other projects or plans are as follows:

- Recreational Pressure

Thames Basin Heaths SPA

6.1.2 The Thames Basin Heaths SPA 5km zone affects a large number of authorities: Waverley, Hart, Wokingham, Bracknell Forest, Rushmoor, Runnymede, Guildford, Surrey Heath, Elmbridge and Woking. In total approximately 30,000 new dwellings are planned for delivery within 5km of the Thames Basin Heaths SPA over the Neighbourhood Plan period.

6.1.3 In particular, the Waverley Local Plan identifies a total housing requirement of at least 11,210 new houses in the borough over the period 2013-2032. At the time the Waverley Local Plan Part 1 was submitted (2017) 2,214 houses were allocated to Farnham; for the adopted Local Plan the minimum housing figure rose to 2,780 dwellings. The Farnham Neighbourhood Plan Review therefore enables 3,005 dwellings; this higher number is intended to allow for some flexibility in delivery.

6.1.4 In addition, the Waverley Local Plan was subject to HRA in 2016 through to 2017. The HRA plan identified that there are considerable threats to the Thames Basin Heaths SPA within the Waverley Borough from recreational pressure ‘in combination’ without mitigation. The in combination housing growth of the surrounding settlements of Waverley (and therefore Farnham) include the district of Rushmoor with 7,850 net dwellings over their plan period and Hart district of at least 6,208 dwellings. The grouping effects of all these settlements in the absence of mitigation would result in severe adverse impacts on the integrity of the Thames Basin Heaths SPA.

6.1.5 However, for all of the Local Plans discussed above, appropriate Thames Basin Heaths SPA avoidance and mitigation strategies and HRA assessments have been previously conducted prior to publication. Example policies and related text are included in Table 2.

Table 2 summaries the relevant Thames Basin Heaths SPA or (with regard to Waverley) the Wealden Heaths Phase I SPA policies of Waverley Borough, Rushmoor District and Hart District and Farnham Neighbourhood Plan Review itself.

| Relevant Thames Basin Heaths SPA policy | Policy text |
|---------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Waverley Borough | |
| Policy NE1 | <i>‘Where new development is proposed that would result in a net increase in residential accommodation within 400m of the boundary of Thursley, Hankley and Frensham Commons (Wealden Heaths Phase I) SPA and Wealden Heaths Phase II SPA, the Council will need to be satisfied that there will be no significant adverse effects on the ecological integrity of the SPA through a project level Habitats Regulations Assessment (HRA)...In addition, if a housing proposal is capable of affecting the Wealden Heaths Phase I and II SPAs beyond 400 metres from the site, it will be considered on a case-by-case basis as to whether a project-specific Habitats Regulations Assessment (HRA) is required (this should be assessed at the HRA Screening Assessment stage). The requirement is likely to vary depending on the size of site, the ‘in-combination’ effects and its distance from the SPA.’</i> |
| Policy NE3: Thames Basin Heaths Special Protection Area | <i>‘New residential development which is likely to have a significant adverse effect on the ecological integrity of Thames Basin Heaths Special Protection Area (SPA) will be required to demonstrate that adequate measures are put in place to avoid or mitigate any potential adverse effects. Such measures must be agreed with Natural England. Within the 400m ‘exclusion zone’ of the SPA boundary, no net new residential development will be permitted, as mitigation measures are unlikely to be capable of protecting the integrity of the SPA. New residential development which the Council considers that either alone or in combination is likely to have a significant adverse effect on the SPA beyond 400m and within 5 km of the SPA boundary (in a</i> |

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| | <p><i>straight line) must provide:</i></p> <ul style="list-style-type: none"> • <i>Appropriate contributions towards the provision of Suitable Alternative Natural Greenspace (SANG) identified by the Council; or</i> • <i>A bespoke solution to provide adequate mitigation measures to avoid any potential adverse effects; and</i> • <i>A financial contribution towards wider Strategic Access Management and Monitoring (SAMM)</i> <p><i>Proposals for large scale development (50 dwellings or more) between 5 km and 7 km from the edge of the SPA should be assessed on an individual basis. Where appropriate a full appropriate assessment may be required to ascertain whether the proposal could have an adverse effect on the SPA.</i></p> <p><i>All mitigation measures shall be agreed with Natural England and be provided prior to occupation of the development and in perpetuity. Where mitigation is provided in the form of SANG, the following standards and arrangements will apply:</i></p> <ul style="list-style-type: none"> • <i>A minimum of 8 hectares of SANG land (after discounting to account for current access and capacity) should be provided per 1,000 new occupants.</i> • <i>Developments of fewer than 10 dwellings should not be required to be within a specified distance of SANG land provided it is ensured that a sufficient quantity of SANG land is in place to cater for the consequent increase in residents prior to occupation of the dwellings.'</i> |
| <p>Farnham Town Council</p> | |
| <p>Policy FNP12: Thames Basin Heaths Special Protection Area</p> | <p>Within 400m of the SPA boundary, no net new residential development will be permitted, as mitigation measures are unlikely to be capable of protecting the integrity of the SPA.</p> <p>New residential development which is likely to have a significant adverse effect on the SPA beyond 400m and within 5km of the SPA boundary (in a straight line) must provide:</p> <p>i) appropriate contributions towards the provision of Suitable Alternative Natural Greenspace (SANG) at Farnham Park; Tongham Road, Runfold or Runfold South Quarry Site or</p> <p>ii) a bespoke solution to provide adequate mitigation measures to avoid any potential adverse effects; and</p> <p>iii) a financial contribution towards wider Strategic Access Management and Monitoring (SAMM).</p> <p>Such mitigation measures shall be agreed with Natural England and be provided prior to occupation of the development and in perpetuity. Where mitigation takes the form of provision of SANG the following standards and arrangements will apply: A minimum of 8 hectares of SANG land (after discounting to account for any existing capacity) should be provided per 1,000 new occupants. The SANG should be readily accessed from, and well connected to, the development it serves including by sustainable modes of transport so that it is able to divert or intercept trips from the proposed housing development to the Thames Basin Heaths SPA.</p> <p>Developments of fewer than 10 dwellings should not be required to be within a specified distance of SANG land provided it is ensured that a sufficient quantity of SANG land is in place to cater for the consequent increase in residents prior to occupation of the dwellings.</p> |
| <p>Rushmoor District</p> | |
| <p>Policy SS1 - Presumption in Favour of Sustainable Development</p> | <p><i>'When considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework (or its successor), whilst having regard to the need to assess, and where appropriate mitigate against, the likelihood of significant effect on the Thames Basin Heaths Special Protection Area.'</i></p> |
| <p>Policy NE1 - Thames Basin Heaths Special Protection Area</p> | <p><i>'New development which is likely to have a significant effect on the ecological integrity of the Thames Basin Heaths Special Protection Area (SPA), including all net new dwellings, will be required to demonstrate that adequate measures are put in place to avoid or mitigate any potential adverse effects. The mechanism for delivering this policy is set out in the Council's Thames Basin Heaths Special Protection Area Avoidance and Mitigation Strategy (2014), supported by the Thames Basin Heaths Delivery Framework prepared by the Thames Basin Heaths Joint Strategic Partnership.'</i></p> |

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|-------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | <p><i>Residential development that would result in a net gain of units will not be permitted within 400 m of the SPA boundary unless, in agreement with Natural England, an appropriate assessment demonstrates that there will be no adverse effect on the SPA. In all instances where mitigation measures are applicable, as set out in the Delivery Framework, the following standards will apply, unless an evidence-based alternative strategy has been agreed with Natural England:</i></p> <p>a. <i>A minimum of 8 ha of SANG land (after discounting to account for current access and capacity) should be provided in perpetuity per 1,000 new occupants, either through contributions towards the provision of SANG identified by the Borough Council, or through on-site SANG, agreed with Natural England; and</i></p> <p>b. <i>Contributions towards Strategic Access Management and Monitoring measures'</i></p> |
| <p>Hart District</p> | |
| <p>Policy SD1 Sustainable Development</p> | <p><i>'When considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework (or its successor), whilst having regard to the need to assess, and where appropriate, mitigate against, the likelihood of a significant effect on the Thames Basin Heaths Special Protection Area. It will work pro-actively with applicants to secure development that improves the economic, social and environmental conditions in the area. Hart Local Plan Strategy and Sites 2016-2032 Proposed Submission Version 28 The Local Plan should be read as a whole. Proposals will be judged against all relevant policies.</i></p> <p><i>Planning applications that accord with the policies in the Development Plan (including, where relevant, policies in Neighbourhood Plans) will be approved, unless material considerations indicate otherwise.</i></p> <p><i>Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision, the Council will grant permission unless material considerations indicate otherwise, taking into account whether:</i></p> <p>a) <i>There are available and deliverable avoidance and mitigation measures in respect of the Thames Basin Heaths Special Protection Area; and</i></p> <p>b) <i>Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or</i></p> <p>c) <i>Specific policies in that Framework indicate that development should be restricted.'</i></p> |

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

- 6.1.6 Wealden Heaths Phase I SPA is a smaller SPA than the Thames Basin Heaths, but is also un-fragmented, consisting of four very large blocks of habitat. In general, this means that its designated bird populations are much less vulnerable to edge effects than the designated bird populations of the Thames Basin Heaths.
- 6.1.7 There are two key differences between the Thames Basin Heaths SPA and Wealden Heaths SPA these are: a) Wealden Heaths Phase I SPA is currently under much lower pressure from residential development immediately surrounding the site and b) there is a much lower likelihood of anything other than small quantities of further residential development coming forward within the 400m zone, thus rendering a policy completely prohibiting net residential development within that zone unnecessary; rather, the likely scale is such that impacts can be evaluated on a case-by-case basis as applications come forward.
- 6.1.8 Recreational pressure and disturbance around the Thames Basin Heaths SPA is a long-standing issue and of more intense pressure due to the higher level of urbanization that surrounds the European Site. However, Wealden Heaths Phase I SPA has not been subject to the same magnitude of urbanization and as such the influence zones of this SPA differ to that of the Thames Basin Heaths SPA. Moreover, the scale of new housing expected within 5km the SPA is much smaller than that expected around the Thames Basin Heaths SPA. Current adopted Core Strategies and Local Plans propose to deliver approximately 35,000 dwellings (including windfalls) within 5km of the Thames Basin Heaths over the period to 2030; this compares to c.1,500 within 5km of Wealden Heaths Phase I SPA to 2032. Almost all of the housing planned for delivery within 5km of Wealden Heaths Phase I

SPA is within Waverley Borough, including that within the adopted Local Plan Part I and the forthcoming Local Plan Part 2.

- 6.1.9 The Waverley Local Plan Part 1 HRA²⁴ identified that the Wealden Heaths Phase I site has a core recreational catchment (i.e. 70% of visitors) of 9km due to its highly rural setting. However the LPP1 HRA also concluded that due to the large amount of existing semi-natural green infrastructure located within 9km of the SPA, the relatively small number of existing dwellings (for example, the number of dwellings within 5km of the SPA is one tenth of that around the Thames Basin Heaths) and the small number of net new dwellings to be provided around the SPA over the Plan period (c. 1,500 within 5km), increased recreational pressure from all expected growth within the catchment of the SPA would not adversely affect the integrity of the SPA. Thus, there was no need for a strategic district-wide mitigation solution.
- 6.1.10 During the preparation of the LPP1 HRA Natural England did recommend that the Council undertake HRA on all larger developments located within 5km of Wealden Heaths Phase I SPA to confirm the continuing validity of the assessment contained within the Local Plan HRA with regard to the zone closest to the SPA since that analysis was not informed by particular site allocations beyond strategic sites. This requirement is accommodated within LPP1 text in paragraph 16.28 which states that ‘... if a housing proposal is capable of affecting the Wealden Heaths Phase I and II SPA, beyond 400 metres from the site, it will be considered on a case-by-case basis as to whether a project-specific Habitats Regulations Assessment (HRA) is required (this should be accessed at the HRA Screening Assessment stage). The requirement is likely to vary dependent on the size of site, the ‘in-combination’ effects and its distance from the SPA. Advice on this should be sought from Natural England at the earliest opportunity’. This is reflected in the supporting text of the Neighbourhood Plan, specifically paragraph 5.116, which states that ‘... certain developments, depending on size and distance, may impact the Wealden Heaths SPAs and therefore mitigation may be required. This will need to be assessed on a case by case basis. Where mitigation is deemed to be necessary, it will only be required for developments where mitigation has not already been provided for the Thames Basin Heaths SPA’.
- 6.1.11 However, Switchback Lane, Rowledge will deliver 10 dwellings and therefore falls below the definition of a larger development. As such, it is considered that the conclusion of the Local Plan Part 1 HRA still applies i.e. no adverse effect on integrity alone or in combination with other plans and projects.

6.2 SANG Capacity

- 6.2.1 The town of Farnham is within the 5km catchment for the Thames Basin Heaths SPA. As such the proposed collective development of 3,005 new dwellings within Farnham could have a direct negative impact to the threatened heathlands when considered in combination with the remaining growth in Waverley and elsewhere within 5km of the Thames Basin Heaths SPA. It is therefore necessary to consider available or planned SANG capacity in Farnham Parish.
- 6.2.2 The proposed development of 3,005 dwellings within Farnham could cumulatively increase visitor numbers to the Thames Basin Heaths SPA and Wealden Heaths Phase I SPA. Additional visitors to the areas would result in further disturbance and potential damage to the heathlands and the local biodiversity. Screening Table 1, which shows analysis undertaken for the allocated sites within the Farnham Neighbourhood Plan Review 2018, illustrates that all of these developments would lead to an adverse effect to the integrity of the SPA through pathways previously described. It is therefore necessary that all developments within Farnham Parish are appropriately mitigated for to prevent damaging effects to designated European Sites.
- 6.2.3 In order to alleviate additional recreational pressures faced by the Thames Basin Heaths SPA future developments within Farnham are required to provide avoidance measures (as per Waverley’s Thames Basin Heaths Avoidance Strategy, the Thames Basin Heaths SPA Delivery framework, Waverley Local Plan Policy: NE3 and Farnham Neighbourhood Plan Policy: FNP12).
- 6.2.4 The provision of Suitable Alternative Natural Greenspace (SANG) to draw new residents away from the European Site is an important measure set out by the Delivery Frameworks and policies. Individual developments may provide their own SANG but the minimum requirement for SANG are relatively arduous: an area of attractive natural greenspace, not already heavily used for recreation,

²⁴ AECOM (2016) Local Plan Part 1: Strategic Policies and Sites. Pre-Submission Draft (July 2016) Habitats Regulations Assessment

AECOM (2017) Waverley Borough Council Local Plan Part 1: Strategic Policies and Sites: Additional Housing Habitats Regulations Assessment Addendum

which is at least 8-10ha in size (necessary to be able to accommodate a 2.4km circular walk) and which meets an overall standard of provision of at least 8ha/1000 population. As a result, it is often the case that only very large developments can provide their own SANG. While that option is open to developers seeking to deliver the 3,005 dwellings identified Farnham's Regulation 15 Neighbourhood Plan Review, this appropriate assessment makes the precautionary assumption that some or all of the 3,005 dwellings may have to rely on one of the strategic SANG provided by Waverley Council or a third party.

6.2.5 It is therefore necessary to confirm that there is a strategic SANG with residual capacity located close enough to Farnham to serve that settlement and parish. There are a total of three current or intended future SANG sites that have been considered within this HRA, all of which are at different stages of development; these are Farnham Park, Tongham Road and Runfold South Quarry.

6.2.6 At time of writing approximately 1,608 of the proposed 3,005 dwellings have already been completed or have been granted planning permission and have therefore already been allocated to the existing SANG site at Farnham Park. One site with planning permission for 96 dwellings will have on-site SANG provision. The remaining 1,397 (including the additional 450 dwellings required within the Farnham Neighbourhood Plan Review) do not currently have planning permission. Of these, 922 are to be specifically allocated to development sites in the Neighbourhood Plan Review while 475 are from windfall sites.

6.2.7 Farnham Park

6.2.8 Farnham Park was the first operational SANG located within the Waverley Borough. It is situated directly north of Farnham Town Centre; as such the parish lies well within the catchment²⁵. The habitat of the park is predominantly amenity and semi-improved grasslands, with areas of improved grassland maintained by cattle and patches of dense woodland and open ponds. There is also the Nadder Stream that runs through much of the SANG. Surrounding the site is similar habitats of amenity grasslands and connecting roads and footpaths. The urbanised area of Farnham town can be found directly to the south and the area of Hale is located directly north of the site. The site provides excellent recreational facilities for young families and extensive trail routes suited to dog walkers. The extremely close location of the park to residential areas of Farnham makes this site a well-placed SANG with the ability to attract residents to this site rather than the SPA.

6.2.9 Table 3 describes the number of allocated dwellings for Farnham Park SANG in summary.

Table 3 The residual capacity of Farnham Park SANG and the minimum number of dwellings that may require allocation to a different SANG site.

| Number of dwellings | Description |
|---------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 990 | Residual Capacity of Farnham Park SANG site as of March 2018 according to Waverley Borough Council |
| 1,397 | Dwellings within Regulation 15 Farnham Neighbourhood Plan Review (as of 31 March 2018), not including planning permissions or completions |
| 415 | Minimum remaining number of dwellings that need to be allocated to alternative SANG sites, assuming all housing sites require allocation to SANG ²⁶ |

6.2.10 As illustrated in Table 3, the made Farnham Neighbourhood Plan (2017) allocated all new residential developments to the SANG site at Farnham Park. As such, the residual capacity of Farnham Park was greatly reduced when the Parish was advised to increase their housing developments by 450 dwellings. Table 3 shows that at least 415 may need to be accommodated by an alternative SANG site other than Farnham Park. Policy FNP12 makes it clear that the Neighbourhood Plan expects this capacity to be met (where it cannot be met on site by an individual development) by contributions to Tongham Road SANG and a proposed SANG at Runfold South Quarry.

²⁵ Indicated by the map at:

https://www.hart.gov.uk/sites/default/files/4_The_Council/Policies_and_published_documents/Planning_policy/SANGs%20and%20catchments.pdf

²⁶ In practice, some of this development will not be located within the 5km zone of Thames Basin Heaths SPA and may not be within 5km of Wealden Heaths Phase I SPA

6.2.11 Tongham Road, Runfold

6.2.12 Tongham Road is a recently permitted SANG site located to the west of the Village of Tongham. The site consists of a large body of standing water that is surrounded by unmanaged grassland and large areas of scrub. This site is located within Waverley and Guildford boroughs straddling the boundary with Farnham Parish. Map G of the Neighbourhood Plan Review shows those parts of the SANG in Farnham. The site is within close proximity to Farnham and therefore would constitute an adequate SANG for additional residential development.

6.2.13 Currently, this SANG has a total residual capacity of 570 dwellings (Phases 1 and 2 combined). The landowner has confirmed that the spare capacity could be available to sites in the Farnham area subject to the necessary agreements and it is probable that a large proportion, if not all, of the 415 dwellings that need to be allocated to a SANG other than Farnham Park could be accommodated here.

6.2.14 Runfold South Quarry

6.2.15 This site is approximately 50ha in size with the majority of the site located within the Farnham Parish boundary. In total, 42.6ha of the site is located within Waverley and is owned by SUEZ. These 42.6ha are now being considered for SANG. Natural England has agreed in principle to the use of the site as SANG. Since quarrying activities finished in 2010, the site has been subject to habitat restoration. At present the site consists of large area of tall established saplings, tall ruderal vegetation and large expanses of unmanaged grassland. It has been confirmed by Farnham Council and land owner SUEZ that once an area of land has been allocated for biodiversity restoration and water sport facilities (totalling 0.5ha) the remainder of Runfold South Quarry could potentially be considered for both SANG allocation and biodiversity enhancement. Since current experience indicates that a good SANG should be a minimum of 10ha in size to avoid an excessively convoluted circular walk, the site will have the opportunity to provide plentiful open green space in the form of playing fields, walking trails and open woodland/ parkland areas.

6.2.16 Runfold South Quarry is also well connected to the North Downs Way National Trail. The North Downs Way is a 153 miles journey from Farnham to Canterbury and the White Cliffs of Dover. This trail travels through the Surrey Hills Area of Outstanding Natural beauty (AONB) and the Kent Downs (AONB). Much of the trail supports chalk grassland of high biodiversity value. The connection of the North Downs to Runfold South Quarry via the trail could be of significant benefit to the restoration project and indeed biodiversity.

6.2.17 Although Runfold South Quarry is not currently an adopted SANG site, the site's restoration works are under progress with the aim of completion at around 2021. From previous analysis of this site in 2015, it was anticipated that the aforementioned 42.6ha area of this site would support a population of approximately 5,325, which is equivalent to 2,218.8 new dwellings (using an occupancy rate of 2.4 residents per dwelling). However, the average occupancy of dwellings in Waverley has since reduced to c. 2 residents per dwelling. On the basis of the new average occupancy figure, the 42.6ha area identified as viable for SANG could support approximately 2,662.5 dwellings. Coupled with the Tongham Road SANG this would provide ample SANG capacity for Farnham for the Neighbourhood Plan period and beyond.

6.2.18 This SANG site is not only referenced in Neighbourhood Plan policy FNP12 but is also covered by Neighbourhood Plan Policy FNP26: Sites for new outdoor sports facilities and other green uses. That latter policy states that a much larger broad area '*...is allocated for new outdoor sports facilities and other appropriate greenspace uses, including new sports pitches, associated changing rooms and supplementary landscaping, subject to environmental and land restoration considerations*'. As such it is the view of Farnham Town Council that this larger site will be brought forward for both SANG and recreational uses

6.2.19 At the time of writing, this SANG will not be in operation until 2021 and as such any net residential dwellings that are to be allocated to this SANG Site should not be occupied until the appropriate SANG mitigation is in operation. Policy FNP12: Thames Basin Heaths Special Protection Area (SPA) already identifies this requirement with the following text: '*Such mitigation measures shall be agreed with Natural England and be provided prior to occupation of the development and in perpetuity*'.

6.2.20 Any net dwellings allocated within the Neighbourhood Plan which will need to rely on Farnham Park, Tongham Road and Runfold South Quarry SANG sites will be required to make financial contributions to the delivery of the selected SANG sites and its management in perpetuity as per the Adopted and

Reviewed Neighbourhood Plan Policy FNP12, the Waverley Borough Thames Basin Heaths Avoidance Strategy and the tariffs provided on the Waverley Borough Council website²⁷.

- 6.2.21** Sufficient SANG can be delivered in Farnham to cover the total housing number required for the Neighbourhood Plan Review and beyond and an adequate policy framework to protect Thames Basin Heaths SPA is set out in Policy FNP12.

6.3 Strategic Access Management and Monitoring Contributions

- 6.3.1 In addition to SANG provision, it must be noted that all net new residential dwellings within 5km of the Thames Basin Heaths SPA must also provide an appropriate Strategic Access Management and Monitoring (SAMM) contribution in line with the Waverley Thames Basin Heaths Avoidance Strategy (and retained policy NRM6 of the South East Plan) and Policy FNP12 of the Farnham Neighbourhood Plan Review: ‘a financial contribution towards wider Strategic Access Management and Monitoring (SAMM)’.
- 6.3.2 The current SAMM tariffs that are standard throughout the whole of the Waverley Borough can be found at: http://www.waverley.gov.uk/downloads/file/5517/thames_basin_heaths_special_protection_area_spa_calculator
- 6.3.3 The figures used within Waverley’s calculator for assessing the required SAMM tariff contributions can be viewed in Table 4. Note: the additional consultation fee with Natural England in accordance to the number of dwelling bedrooms.

Table 4 taken from Waverley Council shows the contribution required for avoidance of the impact of development on the Thames Basin Heaths SPA.

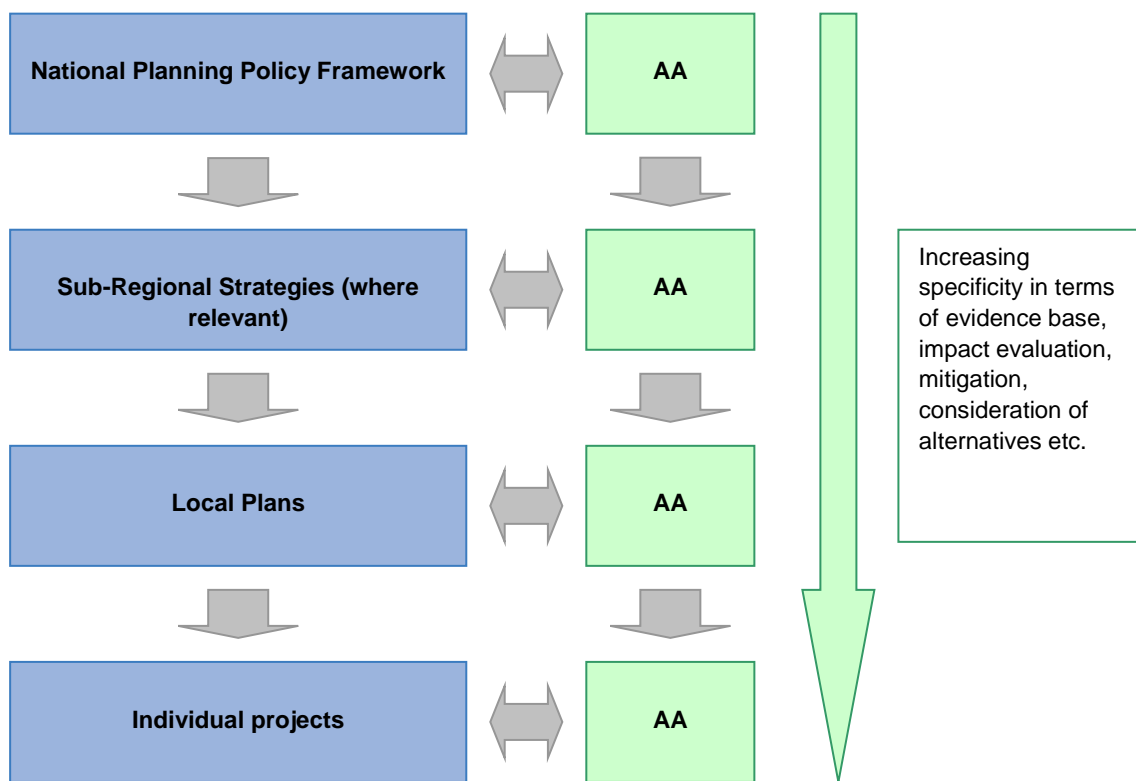
| Number of Dwellings | Number of Bedrooms | | | | |
|---------------------|---------------------|-------------|-------------|-------------|---------------|
| | 1 | 2 | 3 | 4 | 5+ |
| 1 | £1,389 | £1,866 | £2,661 | £3,032 | £3,954 |
| 2 | £2,778 | £3,732 | £5,322 | £6,064 | £7,908 |
| 3 | £4,167 | £5,598 | £7,983 | £9,096 | £11,862 |
| 5 | £6,954 | £9,330 | £13,305 | £15,160 | £19,770 |
| 10 | £13,890 | £18,660 | £26,610 | £30,320 | £39,540 |
| 20 | £27,780 | £37,320 | £53,220 | £60,640 | £79,080 |
| 50 | £69,450 | £93,300 | £133,050 | £151,600 | £197,700 |
| | Natural England Fee | | | | |
| | £415 | £558 | £796 | £907 | £1,182 |

²⁷ http://www.waverley.gov.uk/downloads/file/5517/thames_basin_heaths_special_protection_area_spa_calculator [Accessed: 27/09/2018].

7 Conclusion

- 7.1.1** It is considered that an adequate policy framework will be in place to ensure no adverse effects of the Neighbourhood Plan Review on the integrity of the Thames Basin Heaths SPA and Wealden Heaths Phase I SPA or any other European sites. This is due primarily to the high level of confidence that sufficient SANG capacity will be available in Farnham.

Appendix A. 'Tiering' in Habitats Regulations Assessment



About AECOM

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