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1. INTRODUCTION

1.1 The purpose of the Habitats Regulations Assessment (HRA) of land use plans is to ensure that consideration is given to sites protected by European Directives as part of the development of planning policy.

1.2 This HRA is conducted in support the emerging Tandridge District Council ‘Local Plan 2033’ (hereafter referred to as Local Plan), giving particular consideration to options for a new Garden Village.

1.3 The HRA is a staged process, essentially iterative, being revisited as necessary in response to more detailed information, recommendations and any relevant changes to the plan or project until no significant adverse effects remain. This report presents the latest findings of Stage 1: Screening. The purpose of this HRA stage 1 is to identify potential significant adverse effects on protected Natura 2000 sites (known in this report as protected sites) by policies of the emerging Local Plan.

1.4 There are no protected sites within Tandridge District. However, there are two areas of protected sites within neighbouring districts which need to be considered as part of the HRA process. These are the Ashdown Forest SAC and SPA, and the Mole Gap to Reigate Escarpment SAC.

1.5 This document has been prepared by Tandridge District Council in partnership with EH Planning Projects (the in- house Planning Policy Team of East Hampshire District Council).

Structure of the Document

1.6 This report is in 6 parts and consists of this introduction and the following sections:

- **Section 2** provides contextual information on both the Local Plan itself and the requirement to undertake a HRA for the Local Plan;
- **Section 3** describes the HRA process;
- **Section 4** reviews the information needed to undertake *Stage 1: Screening*;
- **Section 5** describes the potential Garden Village broad location options;
- **Section 6** presents the findings of *Stage 1: Likely significant effects* (*Screening*) and
- **Section 7** details the report’s conclusion and identifies the next steps of the HRA that will be undertaken following *Stage 1: Screening*.

Consultation

1.7 As required by regulations that relate to the HRA, this report is published for consultation between **14 August and 9 October 2017 (5pm)**. Comments on this report can be sent to us by:

- Email: localplan@tandridge.gov.uk; and
1.8 An electronic version of this document can be found online at www.tandridge.gov.uk/localplan.

1.9 Comments made on the document after the end of the consultation period (5pm on 9th October 2017) will not be accepted. More information about the Local Plan can be found on our webpage www.tandridge.gov.uk/localplan.
2. **CONTEXT**

The Tandridge District Council Local Plan and supporting HRA

2.1 Tandridge District Council (TDC) is preparing a Local Plan to guide development in the district to 2033. The Local Plan will include housing and employment targets and will seek to allocate sites to ensure such targets can be delivered, whilst also containing a set of policies to manage development in a sustainable manner. If necessary, and as informed by HRA work, it will introduce policies to ensure the protection of European sites from any adverse impacts of the Local Plan.

2.2 The stages so far of the Local Plan are set out in the diagram below.

2.2 In March 2017, the TDC Planning Policy Committee agreed the preferred strategy to be pursued in preparing the Local Plan. This sets out that development will be delivered through a combination of a new ‘Garden Village’ and some limited development within and on the edges of certain built up areas.

2.3 The Local Plan: Garden Village Consultation sets out four potential Garden Village locations which are being considered by the Council for a development which would be of a size and scale to accommodate a scheme which accords with the principles of a Garden Village. More detail can be found in Section 5 of this report.

2.4 This HRA report, which accompanies the Local Plan Regulation 18 Garden Villages Consultation, updates the two earlier HRA Stage 1 Screening Reports published in support of the ‘Tandridge Local Plan 2033’, as follows:

- HRA Stage 1: Screening (2016 Update). Published in October 2016, which was prepared to accompany the Local Plan: Sites Consultation document, which took place Nov 2016 to Dec 2016; and
- HRA Stage 1: Screening (December 2015), which was prepared to accompany the Local Plan: ‘Issues and Approaches Consultation, which took place Dec 2015 to Feb 2016.

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1 In accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012
The reason behind this further iteration of the HRA Stage 1 Screening is twofold:

- It is necessary to screen the four potential Garden Village locations, two of which were not included in previous HRA Stage 1 screening for the Local Plan.
- To update the screening in light of the significant implications arising from recent High Court judgements, particularly the case Wealden District Council v. Secretary of State for Communities and Local Government, Lewes District Council and South Downs National Park Authority [2017] EWHC 351. The case concerned the approach to in-combination assessments pursuant to the Habitats Regulations and is considered to have a bearing on previous assumptions made as part of the October 2016 Stage 1 HRA prepared to accompany the Local Plan: Sites Consultation document, and the December 2015 HRA, which was prepared to accompany the Local Plan: Issues and Approaches, consultation.

Once adopted, the Local Plan will guide development within Tandridge district until 2033 and replace the existing Core Strategy which came into effect in 2008.

**HRA Legislation and Regulations**

As part of the process of developing the Local Plan, TDC must abide by relevant European and national legislation and regulations. Such obligations include Council Directive 92/43/EEC on the Conservation of Natural Habitats and of wild flora and fauna – most commonly referred to as the Habitats Directive.

Of particular relevance to plan-making is article 6(3) of the Habitats Directive, which 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. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public.”

The Habitats Directive has been transposed into British law by the Conservation of Habitats and Species Regulations 2010. These Regulations are most commonly referred to as the Habitats Regulations.

Of specific relevance to the development of the Local Plan is Paragraph 102 of the Habitats Regulations, which requires plan-making authorities to appropriately assess the implications of their land use plans on European sites. As TDC is the plan-making authority for the purposes of Paragraph 102 of the Habitats Regulations, it is required to appropriately assess

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2 This is despite the recent Referendum on the UK’s membership of the European Union. The decision to leave the European Union does not result in an immediate removal of EU policy or legislation and compliance with relevant legislation remains necessary until such time as it is replaced, amended or revoked.
the impact of the Local Plan on European sites, where it is likely to have a significant effect (either alone or in combination with other plans or projects).

2.11 The HRA report will consider relevant European sites which consist of:

- Special Areas of Conservation (SAC) – sites designated to provide increased protection to a variety of wild animals, plants and habitats.
- Special Protection Area (SPA) – sites designated for the breeding, feeding, wintering or the migration of rare and vulnerable species of birds found within EU countries.

2.12 It is also Government policy for sites designated under the Convention on Wetlands of International Importance (Ramsar sites) to be treated as having equivalent status to European sites (although in practice there are no Ramsars that are necessary to consider as part of the Tandridge District HRA process).

2.13 For the remainder of this report, for the sake of simplicity, the different types of sites which the HRA must consider will be collectively known as ‘protected sites’.

2.14 A number of key documents have informed this screening report, including the former Department for Communities and Local Government consultation paper on Appropriate Assessment of Plans in 2006 which remains the principal official guidance, and:

- European Commission “Assessment of plans and projects significantly affecting Natura 2000 sites”;
- The National Planning Policy Framework;
- Circular 06/2005 Biodiversity and Geological Conservation - statutory obligations and their impact within the planning system (although Planning Policy Statement 9 has been superseded the Circular remains in force);
- Natural England’s guidance notes on HRA; and
- Guidance on HRA of plans produced by RSPB.

2.15 Natural England will be consulted throughout the HRA process to provide advice on the requirements.
3. STAGES OF THE HABITATS REGULATIONS ASSESSMENT PROCESS

3.1 Best practice has demonstrated that Local Plans should be subjected to HRA at the earliest possible stage in their production to enable any potential significant effects to be identified and mitigated early on in the plan-making process.

3.2 An “effect” includes anything which would impact upon a protected site. Temporary, permanent, direct and indirect effects need to be considered. A plan or project does not need to be located on a site in order to impact on it. Generally the closer an activity is, the greater the chance it will affect a site. However, operations taking place far from a protected site may still be capable of having a significant effect (e.g. a project which extracts water may affect a site some distance away by altering the water table, and emissions to air or water may impact on sites distant to the source of the emission).

3.3 A hierarchy of avoidance, mitigation and compensatory measures is promoted by the Directive. The approach to undertaking a HRA is a step by step process which contains the following stages:
   Stage 1: Likely significant effects (‘screening’);
   Stage 2: Appropriate Assessment (the ‘integrity test’); and
   Stage 3: Mitigation measures and alternative solutions

   In exceptional circumstances, if following Stage 3, a plan cannot avoid an adverse effect (or risk of one) on a Protected site, there may be a further stage – referred to as the Imperative Reasons of Overriding Public Interest (IROPI) Test.

3.4 More details on all these stages can be found in the following sections.

Stage 1: Likely significant effects (‘Screening’ stage)

3.5 The Screening stage, which this report represents, seeks to identify whether the Local Plan is likely to have a significant effect on a protected site and in doing so, determines whether subsequent stages of the HRA process are required to be undertaken.

3.6 In undertaking the Screening stage, the authority has to consider relevant available information in concluding whether a significant effect is likely to occur to a protected site. This includes giving consideration to other plans and strategies, which will allow the authority to assess whether the plan is likely to have a significant effect by itself or in combination with other plans that are in force or in production.

3.7 Throughout the process the precautionary principle is applied to the HRA. This means that where there is not enough information to assess whether a plan or project is likely or not to have a significant effect on a protected site, it should be assumed that a risk may exist. If this

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3 Source: DEFRA ‘The Habitats and Wild Birds Directives in England and its seas Core guidance for developers, regulators & land/marine managers December 2012 (draft for public consultation)
is the case, it would result in either Stage 1 being undertaken at a later stage when more details are known or the HRA proceeding to Stage 2: Appropriate Assessment.

**Stage 2: Appropriate Assessment**

3.8 If this stage is necessary, an Appropriate Assessment (AA) will be carried out to establish the potential effects of the plan on the protected site’s integrity. In doing so, the AA will consider the site’s qualifying features, its conservation objectives and the key environmental conditions which support the site’s integrity.

3.9 Regulation 102 of the Amended Habitats Regulations 2010 requires an Appropriate Assessment to identify any potential in-combination effects; therefore, it is necessary to establish which other plans and strategies may affect the protected site(s) considered in this assessment.

3.10 If it is found that the plan will impact on the site’s integrity, it is necessary to proceed to the third stage of the process to consider mitigation measures and alternative solutions to prevent negative impacts to the protected site(s) arising from the plan.

**Stage 3: Mitigation measures and alternative solutions**

3.11 If there is an adverse effect on the integrity of the protected site(s), these effects should be mitigated. The main aim of seeking mitigation is to fully cancel out any adverse effects the plan may have on a protected site. It is accepted that it is not always possible to completely eradicate the plan’s negative impacts on a protected site. Therefore mitigation would need to ensure sufficient reduction so that an adverse impact on the integrity of the protected site(s) can be nullified. Measures will normally involve the modification of a plan or project.

**After the Appropriate Assessment - What happens if a plan cannot avoid an adverse effect (or risk of one) on a protected site?**

3.12 In exceptional circumstances, an authority can implement a plan even when the HRA process concludes that there would be a negative impact on a protected site’s integrity that could not be overcome by mitigation or by choosing alternative solutions. This is because Article 6(4) of the Habitats Directive allows an authority to implement a plan if there are imperative reasons of overriding public interest (more commonly written as its acronym, IROPI) for doing so. In such an instance, compensatory measures would have to put in place to counteract some of the plan’s negative impacts. These must be taken to ensure that the overall coherence of the network of protected sites is protected.
4. INFORMATION FOR STAGE 1: LIKELY SIGNIFICANT EFFECTS (‘SCREENING’)

4.1 As part of Stage 1: Screening, a range of information needs to be considered in order to complete a Screening Assessment for each protected site. This Screening Assessment considers key environment conditions and any possible effects the Local Plan may have on these. This section presents information that has been considered.

The ‘Protected Sites’

4.2 There are no protected sites within Tandridge District. There are however two protected sites within neighbouring districts which therefore, taking a precautionary approach, should be subject to the HRA process. These are:

- Ashdown Forest SAC and SPA; and,
- Mole Gap to Reigate Escarpment SAC.

The sites and their geographic relationship to Tandridge District Council can be seen in Appendix 1.

4.3 Protected sites have different reasons for designation and accordingly they have different pressures. Information about both sites can be found in Table 2 below. In addition, the more detailed site citations published under the EU Directives are at Appendix 2.

4.4 There are two relevant ‘Site Improvement Plans’ (SIPs) as follows:

- Ashdown Forest Site Improvement Plan
- Mole Gap to Reigate Escarpment Site Improvement Plan

4.5 These SIPs were produced by Natural England who led a 2 year programme (finished in 2015) in partnership with the Environment Agency with support from the European Union’s LIFE+ Nature and Biodiversity programme. Essentially the SIPs set out plans on how to target efforts on the protected sites to get them into a healthy state. As such, they provide some insight into the existing challenges facing the protected sites.

4.6 For example, the Ashdown Forest SIP highlights threats that include air pollution – the impact of atmospheric nitrogen deposition and public access disturbance. For each threat, a set of actions is identified. It is notable that in relation to atmospheric nitrogen deposition, the mechanism of a ‘Site Nitrogen Action Plan’ (SNAP) was identified, but the funding and delivery body not yet identified. The Mole Gap to Reigate Escarpment SIP also highlights the threats of atmospheric nitrogen deposition and public access disturbance.

4.7 Site of Special Scientific Interest (SSSI) Condition Analysis can be found in Appendix 3. SSSI monitoring is undertaken by Natural England as part of their statutory duties. The objectives of SSSI monitoring include informing agreement of the most appropriate site management and contributing to Natural England’s monitoring of long-term changes in the natural environment. It is important to note that all Natura 2000 and Ramsar sites are also covered by
the statutory national SSSI designation, therefore the condition analysis of SSSI may provide useful insights into the condition of internationally protected sites. However, the data should be treated with caution since the SSSI boundaries cover a slightly greater extent than the international sites, as demonstrated in Table 1, so will include condition assessments of areas not relevant to the HRA.

Table 1: Comparison of Protected Sites by Spatial Extent

<table>
<thead>
<tr>
<th></th>
<th>Subject to HRA</th>
<th>Not Subject to HRA</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>SAC Area (Ha)</td>
<td>SPA Area (Ha)</td>
</tr>
<tr>
<td>Mole Gap to Reigate Escarpment</td>
<td>894.33</td>
<td>N/a</td>
</tr>
<tr>
<td>Ashdown Forest</td>
<td>2,728.31</td>
<td>3,205.46</td>
</tr>
</tbody>
</table>

4.8 The tables in Appendix 3 show that more than three-quarters of the Ashdown Forest SSSI is in unfavourable condition, though recovering. For the Mole Gap to Reigate Escarpment, there is a more even split, with just over half favourable and the remainder unfavourable (mostly recovering).
<table>
<thead>
<tr>
<th>Table 2: Information about the Protected Sites</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Location</strong></td>
</tr>
<tr>
<td><strong>Proximity to Tandridge District</strong></td>
</tr>
<tr>
<td><strong>Extent</strong></td>
</tr>
<tr>
<td><strong>Site Description</strong></td>
</tr>
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<td></td>
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</tr>
</tbody>
</table>

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4 As stated from information on the Joint Nature Conservation Council’s website – [www.jncc.defra.gov.uk](http://www.jncc.defra.gov.uk)
<table>
<thead>
<tr>
<th>Qualifying features&lt;sup&gt;5&lt;/sup&gt;</th>
<th>SAC</th>
<th>SPA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Northern Atlantic wet heaths with <em>Erica tetralix</em>; Wet heathland with cross-leaved heath. European dry heaths <em>Triturus cristatus</em>; Great crested newt.</td>
<td>European dry heaths. Stable xerothermophilous formations with <em>Buxus sempervirens</em> on rock slopes (<em>Berberidion p.p.</em>); Natural box scrub. Semi-natural dry grasslands and scrubland facies: on calcareous substrates (<em>Festuco-Brometalia</em>) (important orchid sites); Dry grasslands and scrublands on chalk or limestone (important orchid sites). <em>Asperulo-Fagetum</em> beech forests; Beech forests on neutral to rich soils <em>Taxus baccata</em> woods of the British Isles; Yew-dominated woodland <em>Triturus cristatus</em>; Great crested newt <em>Myotis bechsteinii</em>; Bechstein’s bat.</td>
<td></td>
</tr>
<tr>
<td>Caprimulgus europaeus; European nightjar (Breeding). Sylvia undata; Dartford warbler (Breeding).</td>
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<table>
<thead>
<tr>
<th>Key</th>
<th></th>
</tr>
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<tbody>
<tr>
<td>· Minimal air pollution;</td>
<td>· Minimal air pollution;</td>
</tr>
</tbody>
</table>

<sup>5</sup> Taken from the Conservation Objectives for the respective sites
### Environmental Conditions to Support Site Integrity

- Relatively unpolluted water (approx. neutral pH);
- Low recreational disturbance;
- Suitable foraging and refuge habitat within 500m of ponds;
- Balanced hydrological regime to maintain wet heath;
- Grazing management to prevent succession.
- Some ponds deep enough to retain water throughout February to August (at least once in three years);
- Good connectivity of landscape features.

### Vulnerability

**SAC**

Ashdown Forest is one of the most extensive areas of heathland in south-east England. The optimum management for this site is grazing; however, only approximately 19% of the SAC is grazed. Spread of scrub and bracken is a major threat to the SAC.

The majority of the SAC (including the grazed area) is managed sympathetically by the Conservators of Ashdown Forest but there is high demand on resources for scrub clearance, bracken mowing, etc., particularly in the ungrazed area. There is ongoing liaison with the Conservators and other land owners/managers to increase the area of grazed heathland. Obstacles to grazing include public opposition to fencing, availability of graziers/suitable livestock, and constraints on dog-walkers. In general, public access is not a threat to the SAC, unless it prevents expansion of the grazed area.

Also, possible long-term drying out of the site may take place, due to borehole extraction and transpiration from increase in vegetation cover. Consultations with the Environment Agency over the possible impact of extraction are ongoing. Recent increased scrub clearance

Most of this site is a mosaic of chalk downland habitats, ranging from open chalk grassland to scrub and broadleaved semi-natural woodland on the scarp slope of the North Downs. Headley Heath is an area of heathland, grassland and woodland located on clay-with-flints on the dip slope. Both box and yew are well represented.

Recreational pressure is high and requires management and monitoring. The National Trust and Surrey County Council own and manage a significant proportion of the site. In addition smaller areas are owned by other local authorities and the local wildlife trust. Recreation and conservation requirements tend to be taken into consideration by such bodies. The rest of the site is in smaller private ownerships. For these areas, appropriate management has been addressed through the Site Management Statement process. These areas are most under threat from neglect and a lack of appropriate grazing.

Bechstein’s bats use the site throughout the year, as a winter

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6 Taken from the Ashdown Forest SAC Natura 2000 data form - [http://jncc.defra.gov.uk/protectedsites/sacselection/n2kforms/UK0030080.pdf](http://jncc.defra.gov.uk/protectedsites/sacselection/n2kforms/UK0030080.pdf)
| is likely to have a beneficial effect on wet heath.  

**SPA**
Lack of management is the main threat to the site. Succession from open heathland to woodland is rapidly taking place and a lack of resources makes appropriate and sustainable management difficult.

The majority of the site is managed by the Conservators of Ashdown Forest, who manage the site sympathetically and according to an agreed management plan. The key vulnerability is the lack of grazing which is now being addressed through a Grazing Strategy. Obstacles to grazing include the need for fencing, constraints on dog walkers and other forms of informal recreation, the availability of appropriate stock and the fragmentation of the heathland blocks within the site. The spread of invasive/non-native species, such as bracken and rhododendron, also poses a threat. The areas not under the Conservators remit tend not to be grazed and have varying degrees of conservation management.

Most of the recreation on the site is informal, such as walking and horse riding. However, in places the use is intense resulting in damage to rights of way and disturbance to the Forest. Where possible these problems are being addressed through the Integrated Management Plan of the Conservators of Ashdown Forest and through a horse riding permit system.

| hibernacula, autumn 'swarming' site, and as feeding habitat. English Nature is currently working with local bat surveyors to locate maternity roosts, and to gain a better understanding of the movements and requirements of bats on this site.  

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7 Taken from the Ashdown Forest SPA Natura 2000 data form - [http://jncc.defra.gov.uk/pdf/SPA/UK9012181.pdf](http://jncc.defra.gov.uk/pdf/SPA/UK9012181.pdf)

8 Taken from the Mole Gap to Reigate Escarpment SAC Natura 2000 data form - [http://jncc.defra.gov.uk/protectedsites/sacselection/n2kforms/UK0012804.pdf](http://jncc.defra.gov.uk/protectedsites/sacselection/n2kforms/UK0012804.pdf)
Other relevant plans and strategies

4.9 When undertaking the HRA, it is necessary to look at relevant plans produced by other authorities to understand whether the Local Plan, in combination with other plans and strategies, could have a significant effect on a protected site.

4.10 Following the Wealden District Council v. Secretary of State for Communities and Local Government, Lewes District Council and South Downs National Park Authority High Court Judgement, it is particularly important to highlight the importance of considering the cumulative impacts on the protected sites. Therefore, the impacts resulting from Tandridge’s Local Plan cannot be assessed in isolation, but need to be considered ‘in combination’ with the plans and policies of other authorities.

4.11 A summary of the main matters of contextual relevance from other plans are found in Table 3 below, based on a judgement of likely significance. For the Ashdown Forest this includes all local planning authorities currently cooperating as part of the Ashdown Forest Air Quality Group.
Table 3: A summary of relevant issues covered in other authorities' Plans

<table>
<thead>
<tr>
<th>Local Authority</th>
<th>Local Plan(s)</th>
<th>Main Matters of Relevance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Brighton &amp; Hove</td>
<td>City Plan Part One (adopted 2016). The City Plan Part Two Scoping document (development management policies and allocations).</td>
<td>Identifies 13,200 new homes to be built over the plan period 2010 – 2030. No policies specifically relate to Ashdown Forest SPA/SAC or Mole Gap to Reigate Escarpment SAC. However, the biodiversity policy acknowledges the importance of international designated sites.</td>
</tr>
<tr>
<td>Bromley</td>
<td>Proposed Submission Draft Local Plan 2015 – 2031.</td>
<td>Identifies 6,413 homes to be delivered between 2015 and 2025. Identifies a minimum average of 641 homes per annum over a 10 year period and where possible over a 15 year plan period.</td>
</tr>
<tr>
<td>Crawley</td>
<td>Crawley 2030: Crawley Borough Local Plan 2015 - 2030 (adopted December 2015)</td>
<td>Identifies about 5,000 new homes between 2015 – 2030. Ashdown Forest SPA/SAC and Mole Gap to Reigate Escarpment SAC were screened out from further stages of the HRA process and consequently no policies relate to such sites. However, following the recent High Court judgement on the Lewes Joint Core Strategy, whereby they failed to consider the cumulative ecological impacts on Ashdown Forest relating to the increase in nitrogen deposition, affected local authorities (including Crawley) are now working collectively to re-address this significant issue.</td>
</tr>
<tr>
<td>Croydon</td>
<td>Local Plan: Strategic Policies (2013) Further Alterations to the Local Plan (2015) Croydon Local Plan: Strategic Policies (CLP1.1) partial review (2036)</td>
<td>The Local Plan identifies 20,200 homes to be delivered between 2011 and 2031 (1,010 per annum), in line with original London Plan targets. Further Alterations to Local Plan (2015) identify 14,348 homes to be delivered between 2015 and 2025 at a rate of 1,435 homes per year. The Review identifies a higher housing target (31,850). Croydon have undertaken own</td>
</tr>
<tr>
<td>Local Authority</td>
<td>Local Plan(s)</td>
<td>Main Matters of Relevance</td>
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<td></td>
<td>Screening Assessment and ruled out the Plan from having a significant effect on Mole Gap to Escarpment SAC, even with this increase,</td>
</tr>
<tr>
<td></td>
<td></td>
<td>An HRA Stage 1 Screening was carried out in 2015. It showed the Mole Gap to Reigate Escarpment SAC in exceedance of its critical loads, but screened it out as it is approximately 8km by road from the urban area of Croydon to the SAC which it deemed sufficient distance to say that that traffic originating from Croydon would likely to have dispersed. As such; the HRA considered that there were no realistic pathways present.</td>
</tr>
<tr>
<td>Elmbridge</td>
<td>Core Strategy (Adopted 2011)</td>
<td>The Core Strategy plans for approximately 3,375 net additional dwellings (225 net dwellings annual average) within the Borough between 2011 and 2026.</td>
</tr>
<tr>
<td></td>
<td>New Local Plan underwent Strategic Options Consultation that ended in February 2017.</td>
<td>An HRA of 'Settlement Investment and Development Plans' was undertaken in March 2013. It noted that Mole Gap to Reigate Escarpment was 4km from the Borough boundary, but concluded that were no additional impacts to that identified in the Appropriate Assessment from the Core Strategy and there was no likelihood in-combination effects.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>A Habitats Regulations Assessment Stage 1: Initial Screening Report for the 'Spatial Strategy Options' was undertaken in November 2016. This was inconclusive regarding LSE and indicated the need to update the report at later stages to enable a more detailed assessment of likely impacts to be undertaken before deciding if adverse effects remain and need to proceed to Stage 2: Appropriate Assessment.</td>
</tr>
<tr>
<td>Epsom and Ewell</td>
<td>Core Strategy (Adopted 2007)</td>
<td>Provides for 181 homes per annum or 3,620 dwellings between 2006 and 2026.</td>
</tr>
<tr>
<td>Greater London Authority</td>
<td>The London Plan 2016</td>
<td>The Plan establishes a minimum 10 year housing target 2015-2025 across all London Boroughs of 423,887. This includes the following:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Bromley: 6,413</td>
</tr>
<tr>
<td>Local Authority</td>
<td>Local Plan(s)</td>
<td>Main Matters of Relevance</td>
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</tr>
<tr>
<td></td>
<td></td>
<td>Croydon: 14,348</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Kingston-upon-Thames: 7,330</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Merton: 4,107</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Richmond-upon-Thames: 3,150</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Sutton: 3,626</td>
</tr>
</tbody>
</table>

The Plan's Key Diagram identifies the broad Wandle Valley - a planning and investment corridor of city region importance connecting from Wandsworth through Croydon and down to Gatwick Airport and Crawley. Although the boundary of the Wandle Valley is non-specific, logically this would connect down the M23 through Tandridge District.

<table>
<thead>
<tr>
<th>Guildford</th>
<th>Proposed Submission Local Plan 2017</th>
<th>12,426 homes are planned over the Plan period 2015-2034. There is no reference within the Plan to Gap to Reigate Escarpment SAC or the Ashdown Forest SPA/SAC.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>An HRA (2016) was published to support the Proposed Submission Local Plan: strategy and sites (2016). This has been updated to take account of changes in the Proposed Submission Local Plan: strategy and sites (2017). It focused upon issues related to the Thames Basin Heaths SPA and does not refer to the Mole Gap to Reigate Escarpment SAC or other international sites.</td>
</tr>
</tbody>
</table>

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<td></td>
<td></td>
<td>The HDPF proposes 16,000 new homes over the plan period 2011 – 2013. It includes a general policy protecting nature conservation designated sites. An HRA of the District Planning Framework was completed in 2014. It did not consider the Mole Gap to Reigate Escarpment. Regarding Ashdown Forest, it concluded that as the SAC is 14.7km distant, it was considered well outside of the impact distance.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>In light of the recent High Court judgement on the Lewes Joint Core Strategy, whereby</td>
</tr>
<tr>
<td>Local Authority</td>
<td>Local Plan(s)</td>
<td>Main Matters of Relevance</td>
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</tr>
<tr>
<td>Kingston-upon-Thames</td>
<td>Kingston Core Strategy (adopted 2012).</td>
<td>Adopted in April 2012 and will be replaced by the Kingston Local Plan 2019 – 2041. They failed to consider the cumulative ecological impacts on Ashdown Forest relating to the increase in nitrogen deposition, affected local authorities are now working collectively to try and address this significant issue. No policies specifically relate the Mole Gap to Reigate Escarpment SAC or to internationally designated sites. A Habitats Regulations Assessment - Screening Report (2010) did not appear to be publicly available online at the time of writing.</td>
</tr>
<tr>
<td>Lewes</td>
<td>Core Strategy (Adopted 2016)</td>
<td>The Core Strategy identifies 6,900 homes between 2010 and 2030, mostly distributed away from northern rural area nearest to Ashdown Forest. Advised by Natural England Lewes District Council initially screened out nitrogen deposition from development in Lewes as having a likely significant effect on the Ashdown Forest as transport movements fell below 1,000 annual average daily traffic (AADT) through the Forest. However, a recent High Court judgement was placed on their Joint Core Strategy, whereby it was considered that they failed to consider the cumulative ecological impacts on Ashdown Forest relating to the increase in nitrogen deposition. This related in particular to a stretch of the A26 which had breached the 1,000 AADT threshold ‘in combination’ with other plans and programmes. Following the judgement, the policies of the Lewes District Council Local Plan remain intact, as Wealden DC had been out of time to bring proceedings against the Plan. This has resulted in affected local authorities now working collectively to address this significant issue.</td>
</tr>
<tr>
<td>Merton</td>
<td>Core Planning Strategy (adopted 2011) Sites and Policies Plan (adopted 2014)</td>
<td>Stipulates provision of a minimum of 4,800 additional homes for the period 2011 – 2026. No policies specifically relate Mole Gap to Reigate Escarpment SAC or to international</td>
</tr>
</tbody>
</table>
designated sites. The Merton Sites and Policies Plan HRA states that the Mole Gap to Reigate Escarpment is too distant to be considered relevant to the Plan.

The Core Strategy had an HRA screening in 2010 which concluded that none of the policies in the Core Strategy are likely to result in significant adverse impacts on European Sites.

**Mid Sussex**

<table>
<thead>
<tr>
<th>Local Authority</th>
<th>Local Plan(s)</th>
<th>Main Matters of Relevance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mid Sussex</td>
<td>District Plan (Submitted in August 2016, Examined in July 2017)</td>
<td>The modified Proposed Submission Document identifies 13,600 homes to be delivered between 2014 and 2031. MSDC were initially able to screen out nitrogen deposition from development in Mid Sussex as having a likely significant effect on the Ashdown Forest as transport movements fell below 1,000 AADT through the Forest. However, following the recent High Court judgement on the Lewes Joint Core Strategy, whereby LDC and SDNPA failed to consider the cumulative ecological impacts on Ashdown Forest relating to the increase in nitrogen deposition, affected local authorities are now working collectively to address this significant issue. The potential impact from air quality on the Ashdown Forest SPA/SAC will need to be re-assessed in any future HRA. The matter was considered at the July 2017 Plan Examination where the need to undertake further HRA work was acknowledged. It seems likely (TBC at time of writing) that plan adoption will be dependent on further HRA and that future plan housing numbers will be subject to future HRA outcomes.</td>
</tr>
</tbody>
</table>

**Mole Valley**

<table>
<thead>
<tr>
<th>Local Authority</th>
<th>Local Plan(s)</th>
<th>Main Matters of Relevance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mole Valley</td>
<td>Core Strategy 2009 (2006-2026)</td>
<td>Stipulates 3,760 homes to be delivered in the plan period. The Plan Introduced policy (CS15) to protect Mole Gap to Reigate Escarpment SAC and seeks to prevent development within 800m of the site, unless the effect of development can be mitigated. An HRA was undertaken in 2008. It concluded that, with measures put in place as part</td>
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<td>Local Authority</td>
<td>Local Plan(s)</td>
<td>Main Matters of Relevance</td>
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<td>of the preparation and adoption of the Core Strategy, the Plan, in-combination with others, would not have a significant in combination impact on the Natura 2000 Sites.</td>
</tr>
<tr>
<td>Reigate and Banstead</td>
<td>Core Strategy (2012-2027) adopted in 2014.</td>
<td>The Core Strategy identified 6,900 homes to be delivered (460 homes per year). It introduced a policy to assist in the protection of the Mole Gap to Reigate Escarpment SAC. Most of housing is to be delivered in existing urban areas, with some to be delivered on urban extensions away from close proximity to Mole Gap to Reigate Escarpment SAC. Supporting HRA was prepared for the submission stage (May 2012); an update was then published alongside the Core Strategy Further Amendments (Dec 2012). It considered both the Mole Gap to Reigate Escarpment and the Ashdown Forest but concluded that the Core Strategy, alone and in combination with other plans and projects, would have no adverse impact on the integrity of Natura 2000 sites.</td>
</tr>
<tr>
<td>Rother</td>
<td>Core Strategy 2011 – 2028 (adopted September 2014) Part 2: ‘Development and Site Allocations Plan’ submission expected in 2018. Reg. 18 consultation undertaken December 2016 to January 2017.</td>
<td>Identifies 5,700 new dwellings over the plan period 2011 – 2028. The accompanying HRA screened out the Ashdown Forest SAC due to the distance from the boundary of the District and distance from settlements identified as suitable for development within the Plan. However, following the recent High Court judgement on the Lewes Joint Core Strategy, whereby they failed to consider the cumulative ecological impacts on Ashdown Forest relating to the increase in nitrogen deposition, affected local authorities are now working collectively to commission work to update and try and address this significant issue. As part of any future HRA, this issue will need to be screened.</td>
</tr>
<tr>
<td>Sevenoaks</td>
<td>Core Strategy (2006-2026) Allocations and Development</td>
<td>The Core Strategy identifies 3,300 homes to be delivered through the plan period. The A&amp;DMP indicates 4,732 likely to be delivered during the plan period.</td>
</tr>
<tr>
<td>Local Authority</td>
<td>Local Plan(s)</td>
<td>Main Matters of Relevance</td>
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</table>
|                 | Management Plan (A&DMP) (Adopted Feb 2015)                                  | Their current plan has a general policy on protection of biodiversity assets, which includes the Ashdown Forest.  

Their current objectively assessed needs (OAN) states 12,400 new homes; however, the district is covered by a large percentage of green belt. Sevenoaks are in the process of preparing a new Local Plan from 2015 to 2035. They are preparing to consult on their Regulation 18 in August/September 2017.  

However, following the recent High Court judgement on the Lewes Joint Core Strategy, whereby they failed to consider the cumulative ecological impacts on Ashdown Forest relating to the increase in nitrogen deposition, affected local authorities are now working collectively to commission work to update and try and address this significant issue.  

An HRA of the Sevenoaks District Local Plan 2015-2035 Issues and Options Consultation Was published in August 2017. It considers the impacts of various Local Plan growth options. For the Ashdown Forest, it suggests a 7-9km zone for recreational pressure. For air quality, it suggests that due to the distances involved and the relatively small number of journeys to work from Sevenoaks south to Ashdown Forest, even a large quantum of new growth in the District may not have much effect on daily traffic flows through the SPA/SAC, but recommends further modelling and analysis of the anticipated Local Plan air quality impact is undertaken in combination with neighbouring authorities. |
| Sutton           | Draft Sutton Local Plan 2016 – 2031 (Reg. 19) December 2016                 | The Local Plan target is to deliver at least 6,405 new homes over the plan period 2016-2031 (427 new homes per year).  

No policies specifically relate to the Mole Gap to Reigate Escarpment SAC or to international designated sites. |
<table>
<thead>
<tr>
<th>Local Authority</th>
<th>Local Plan(s)</th>
<th>Main Matters of Relevance</th>
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</thead>
<tbody>
<tr>
<td><strong>Tonbridge &amp; Malling</strong></td>
<td>New Local Plan up to 2031</td>
<td>An HRA of the earlier Core Strategy was undertaken in 2007. In the summer of 2016, based on the prescribed approach, their need was for 13,920 new homes over the 20 year Local Plan period or 696 a year. However, once existing planning permissions and known sites are taken into consideration, approximately 6,000 additional homes will be required. The HRA Screening Report, 2016, did not consider or screen the Ashford Forest SPA/SAC. However, following the recent High Court judgement on the Lewes Joint Core Strategy, whereby they failed to consider the cumulative ecological impacts on Ashdown Forest relating to the increase in nitrogen deposition, affected local authorities are now working collectively to commission work to update and try and address this significant issue.</td>
</tr>
<tr>
<td><strong>Tunbridge Wells</strong></td>
<td>Site Allocations Local Plan (adopted July 2016) Producing a new Local Plan up to 2033 to replace existing Local Plan 2006, Core Strategy and Development Plan Documents.</td>
<td>An HRA for the Site Allocations plan was completed in 2015. It concluded that no site-specific measures are likely to be required for any individual site allocations within the Borough. This was due to the commitment of Tunbridge Wells Borough Council to contribute to monitoring of air pollution on the SAC and SPA and to commit to contributions where any development would interact with the SAMM. The latest OAN is for 648 dwellings per annum, or 12,960 over 20 years (2013 – 2033). Following the recent High Court judgement on the Lewes Joint Core Strategy, whereby they failed to consider the cumulative ecological impacts on Ashdown Forest relating to the increase in nitrogen deposition, affected local authorities are now working collectively to commission work to update and try and address this significant issue. Tunbridge Wells is 4.6km from the Ashdown Forest SPA/SAC boundary at its closest. The potential impact from air quality on the Ashdown Forest SPA/SAC will need to be re-assessed in any future HRA.</td>
</tr>
<tr>
<td>Local Authority</td>
<td>Local Plan(s)</td>
<td>Main Matters of Relevance</td>
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</tbody>
</table>
| Waverley        | Waverley Borough Local Plan (2002).  
Local Plan Part 1: Strategic Policies and Sites up to 2032. (examination currently underway) | The new Local Plan looks forward 15 years and sets out the strategy to develop at least 9,861 new homes in the period from 2013 to 2032.  
A Part 1 HRA was published in 2016 which noted that the Mole Gap to Reigate Escarpment SAC lies approximately 11km from Waverley Borough at its closest point, which is the popular tourist spot of Box Hill, north of Dorking. It commented that the SAC is relatively easy to access from settlements including Godalming and Cranleigh and that the SAC lies within the typical distance over which visitors will travel to reach a countryside site for a day visit. As the SAC is sensitive to recreational pressure, the issue was screened in within supporting text. However the overall conclusion that the Waverley Borough Local Plan Part 1 (Strategic Policies and Sites) will have no adverse effect on the integrity of any European sites, within or beyond the borough boundary, either alone or in combination with other plans and projects. For air quality, the HRA noted that Policy MT1 (Sustainable Transport) would mitigate by minimising atmospheric pollution and improve air quality. and concluded that there will be no residual likely significant effects on the Mole Gap to Reigate Escarpment SAC. |
| Wealden         | Core Strategy (2006-2027)  
New Local Plan 2013-2028 | The Core Strategy had a housing target of 9,440 homes by 2027.  
The New Local Plan identifies 11,456 dwellings, 7,392 granted planning permission therefore the draft Proposed Submission Local Plan provides for an extra 4,064 built by 2028.  
Policy WCS12 proposed specific policy on protection of Ashdown Forest. This had the effect of preventing development within 7km of the forest until adequate mitigation was in place. This policy was quashed by a Court of Appeal judgement on procedural error relating to the SEA regulations. A similar policy will be applied in the interim, however.  
Ashdown Forest SAC/SPA lies within Wealden District. Historic studies into transport |
and air quality impacts on development upon Ashdown Forest have been coordinated by Wealden District Council.

Following the recent High Court judgement on the Lewes Joint Core Strategy, whereby they failed to consider the cumulative ecological impacts on Ashdown Forest relating to the increase in nitrogen deposition, affected local authorities are now working collectively to commission work to update and try and address this significant issue. This includes updated modelling commissioned by Wealden DC and expected by the end of August 2017.

In the interim, Wealden DC have placed District wide restrictions on new development, based on the precautionary principle.
5. **POTENTIAL GARDEN VILLAGE LOCATIONS**

5.1 As highlighted in Section 1, one purpose of this report is to present the findings of the first stage of screening of the Habitats Regulations Assessment considering the four potential locations for a Garden Village and analyses the potential impacts on protected sites.

5.2 The potential locations, for consideration, would take the form of either a new or extended settlement. The potential locations for consideration are:

- Blindley Heath,
- Edenbridge - Land west of Edenbridge,
- Redhill Aerodrome and
- South Godstone.

5.3 These potential locations are set out in further detail in the Council’s preferred strategy paper (March 2017), noting that a fifth broad location (Chaldon) has been subsequently removed from consideration. Two of the locations, South Godstone and Blindley Heath, have already undergone an element of consultation during the Local Plan: Sites Allocation (2016).

5.4 It is important to note at this stage that the potential Garden Village locations do not have precise boundaries. It is therefore too early in the development of these potential locations for a detailed Habitats Regulations Assessment to be undertaken. However, it is possible for the relative merits and demerits of these potential locations to be discussed within the context of their relative implications for protected sites. That is the purpose of this screening assessment. As the Local Plan is further developed to include allocations for specific sites and a preferred location for a Garden Village and other policies, this analysis will be followed by a detailed Habitats Regulations Assessment.
6. SCREENING THE PROTECTED SITES

6.1 Taking account of the information available to the Council (see Section 4 of this report), a Screening Assessment on the likely effect that the Local Plan would have on the relevant protected sites has been undertaken in Table 4 (Ashdown Forest SPA/SAC) and Table 5 (Mole Gap to Reigate Escarpment) below.

Image: Nightjar (Photo Courtesy of David Bull)
### Table 4: Ashdown Forest SAC/SPA Screening Assessment

<table>
<thead>
<tr>
<th>Key environmental conditions to support</th>
<th>Possible effect of Local Plan on protected site</th>
<th>Likely Significant Effect on Protected Site (including in-combination impacts)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Recreational disturbance.</td>
<td>Additional development promoted in the Local Plan will result in additional visitors to the site, having a negative impact on the integrity of the site.</td>
<td>Recreational disturbance (particularly dog walkers) could be having a significant effect on the breeding success of the protected ground nesting birds at the site. The Council will continue to work with such authorities in relation to issues at the Ashdown Forest.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Historic visitor data suggested that most visitors come from areas local to the Forest (within 7km), meaning that additional development in parts of Tandridge near to the Forest may increase recreational disturbance in combination with development planned by other authorities. An updated Visitor Survey was published in March 2017, the implications of which will need consideration in partnership with other planning authorities that potentially impact upon the Ashdown Forest.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>All four potential garden villages are at least 11km from the Ashdown Forest and relatively remote from likely zones of recreational impact. However, at this stage it cannot be categorically determined that the development outlined in the Tandridge District Council Local Plan would not cause recreational disturbance alongside proposed development planned in other authorities. As such, and taking into account the precautionary principle, this will have to be considered at the next stage of the HRA process, or as part of a further Screening Assessment when more information is known.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Tandridge is a co-signatory to an Interim Strategic Access Management and Monitoring (SAMM) Strategy. The SAMM Strategy should help introduce measures to mitigate against the effect of increased patronage to the Ashdown Forest that new development would bring. Further stages of the AA may also consider the potential for Suitable Alternative Green Space (SANGs) to mitigate any impacts</td>
</tr>
<tr>
<td>Key environmental conditions to support</td>
<td>Possible effect of Local Plan on protected site</td>
<td>Likely Significant Effect on Protected Site (including in-combination impacts)</td>
</tr>
<tr>
<td>-----------------------------------------</td>
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<td>--------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Minimal air pollution.</td>
<td>Additional development promoted in the Local Plan risks causing substantial increase in traffic movements on roads passing through or close to the protected site, thereby risking increasing air pollution and nitrogen disposition within the site.</td>
<td>There is a need to consider additional transport movements upon roads that pass near to the protected site. It is necessary to consider cumulative impacts and in combination impacts alongside the other relevant local planning authorities. As the recent Lewes District Council High Court decision indicated, even relatively minor increases in traffic can result in a likely significant effect when considered in combination with the plans and policies of other local planning authorities. As a result we are unable to determine at this point that the Local Plan would not have a significant effect on air pollution, either alone or in combination. Thus, using the precautionary principle, we will have to consider this effect at the next stage of the HRA process, or as part of a further Screening Assessment when more information is known.</td>
</tr>
<tr>
<td>Relatively unpolluted water (approx. neutral pH); Suitable foraging and refuge habitat within 500m of ponds; Balanced hydrological regime to maintain wet heath; Grazing management to prevent succession; Some ponds deep enough to retain water throughout February to August (at least once in three years); Good connectivity of landscape features.</td>
<td>Development promoted in a Local Plan could impact on such conditions by placing pressure on water resources, landscape features and management.</td>
<td>It is not envisaged that the Local Plan would have an impact on such environmental conditions, as they generally relate to site specific areas or management issues that do not occur within Tandridge District. There do not appear to be any river systems that connect to the Forest from Tandridge District, so no hydrological pathways exist. As a result, no significant effect is likely and thus such issues can be screened out from further parts of the HRA process.</td>
</tr>
</tbody>
</table>
## Table 5: Mole Gap to Reigate Escarpment SAC Screening Assessment

<table>
<thead>
<tr>
<th>Key environmental conditions to support</th>
<th>Possible effect of Local Plan on protected site</th>
<th>Likely Significant Effect on Protected Site (including in-combination impacts)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Low recreational disturbance.</td>
<td>Additional development promoted in the Local Plan has an associated risk of leading to additional recreational visitors to the site, having a negative impact on the integrity of the site.</td>
<td>Natural England suggest that recreational disturbance can have a negative impact on the chalk grassland, with dog walking and related nutrient enrichment of grassland impacting on the integrity of the site. The potential location promoted for a ‘Garden Village’ at Redhill Aerodrome is approximately 5km from the Mole Gap to Reigate Escarpment SAC. Proximity to protected international sites is associated with increased risk of recreational disturbance. At this stage it cannot be ascertained whether development anticipated from the Local Plan, including the Redhill Aerodrome Garden Village option, will affect the integrity of the site either alone or in combination with other plans. Consequently, using the precautionary principle, we will have to consider this effect at the next stage of the HRA process or undertake another Screening Assessment when more information is known.</td>
</tr>
<tr>
<td>Minimal air pollution.</td>
<td>Additional development promoted in the Local Plan, in combination with other plans or programmes, causing increase in traffic movements on roads which pass close to the protected site, increasing air pollution within the site.</td>
<td>There is a need to consider additional transport movements upon roads that pass near to the protected site. It is necessary to consider cumulative impacts and in combination impacts alongside other the other relevant local planning authorities. As a result we are unable to say at this point that the Local Plan would not have a significant effect on air pollution, either alone or in combination. Thus, using the precautionary principle, we will have to consider this effect at the next stage of the HRA process, unless the Council undertake another Screening Assessment when more information is known.</td>
</tr>
<tr>
<td>Maintenance of grazing; Absence of direct fertilisation; Suitable foraging and refuge habitat within 500m of ponds; Maintenance of landscape features (hedgerows, woodland, mature trees, etc.)</td>
<td>Development promoted in a Local Plan could impact on such conditions by placing pressure on water resources, landscape features and management.</td>
<td>It is not envisaged that the Local Plan would have an impact on such environmental conditions, as most relate to site specific management issues that do not occur within Tandridge District. The Council does recognise that in theory development in Tandridge could impact on landscape features within Tandridge but near to the SAC that Bechstein’s Bats frequent. Whilst distribution of development is not known, it is seen as unlikely that the Local Plan</td>
</tr>
<tr>
<td>Key environmental conditions to support</td>
<td>Possible effect of Local Plan on protected site</td>
<td>Likely Significant Effect on Protected Site (including in-combination impacts)</td>
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<tr>
<td>and roosts used by Bechstein’s bats; Maintenance of tree management.</td>
<td>will promote development in such locations. Considering the above, the Council has determined that no significant effects are likely and thus such issues can be screened out from further parts of the HRA process.</td>
<td></td>
</tr>
<tr>
<td>Drainage and Water Pollution</td>
<td>Natural England’s SSSI Impact Risk Zones (IRZs) extend from the Mole Gap to Reigate Escarpment SSSI out across an area of the west side of Tandridge District that includes much of the Redhill Aerodrome potential Garden Village location, as well as other areas including Nutfield and land west of Chaldon. The IRZ notes that any proposals that generate a discharge of water or liquid waste greater than 20 cubic metres per day (that would not go into a mains sewer) would need to be looked at in more detail. A more stringent threshold of 5 cubic metres per day applies to a much smaller area of Tandridge District east of Redhill and north of the Redhill to Godstone railway line. As noted in Table 1 the Mole Gap to Reigate Escarpment SSSI covers a similar area than the SAC of the same name. So impacts upon the SSSI are highly relevant to consideration of likely significant effects on the SAC. The possibility of several thousand homes being constructed on the Redhill Aerodrome potential Garden Village Location, which may be partially within the SSSI IRZ therefore needs further consideration. This is, particularly as there appears to be a hydrological pathway in the form of the River Mole and its tributaries which flows north-west from this area connecting to the Mole Gap to Reigate Escarpment SAC. Development of any significant scale (i.e. to warrant a Local Plan allocation) would link to the mains sewer system. TDC Local Plan ‘Detailed Policies’ (Adopted 2014) DP21 on Sustainable Water Management encourages the use of SuDS. However, The Local Plan 2033, which will also take forward a preferred Garden Village Option, will need policy to categorically ensure the delivery of SuDS in the IRZ before this possible effect can be fully screened out.</td>
<td></td>
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</tbody>
</table>
7. CONCLUSIONS AND NEXT STEPS

7.1 The report has considered the impact that the Local Plan could have on the Ashdown Forest SAC/SPA and the Mole Gap to Reigate Escarpment SAC as part of Stage 1: Screening of the Habitat Regulations Assessment (HRA). In doing so, it has taken into consideration the nature of the sites and the reasons for their respective designations, whilst also having regard to the precautionary principle and the in-combination effect with other plans.

7.2 At this stage, based on the precautionary principle, it is not possible to determine that the Local Plan would not have a likely significant effect on the protected sites, in combination with other plans and programmes. The factors which cannot be screened out are:

Ashdown Forest SAC and SPA
- Risk of increase air pollution at the Ashdown Forest.
- Risk of increase in recreational disturbance at the Ashdown Forest SPA, affecting the ground nesting birds.

Mole Gap to Reigate Escarpment SAC
- Risk of increase in air pollution;
- Risk of increase in recreational disturbance, affecting the chalk grassland; and
- Risk of increase in water pollution

7.3 As such, the above issues will be considered at the next stage of the HRA process, Stage 2: Appropriate Assessment. This is unless another Screening Assessment is undertaken when more information is known that would enable the Council to determine that the Local Plan would not cause some or all of the identified effects on the integrity of the protected sites.

Consultation (between 14th August 2017 and 5pm on 9th October 2017)

If you wish to comment on this HRA, please do so via the Council’s web portal here: http://consult.tandridge.gov.uk/portal/

Alternatively comments can be received via:
- Email: localplan@tandridge.gov.uk; or
- Post: Planning Policy, Tandridge District Council, Council Offices, Station Road East, RH8 0BT.

Comments made after the end of the consultation period (5pm on the 9th October 2017) will not be accepted. More information about the Local Plan can be found on our webpage: www.tandridge.gov.uk/localplan
Appendix 1 – Map of Relevant International Sites

Key
- Ashdown Forest SPA/SAC
- Mole Gap to Reigate Escarpment SAC
- Tandridge district boundary
Appendix 2 – Site Citations

Appendix 2a – Citation for Ashdown Forest SAC

EC Directive 92/43 on the Conservation of Natural Habitats and of Wild Fauna and Flora

Citation for Special Area of Conservation (SAC)

Name: Ashdown Forest
Unitary Authority/County: East Sussex
SAC status: Designated on 1 April 2005
Grid reference: TQ451306
SAC EU code: UK0030080
Area (ha): 2729.00
Component SSSI: Ashdown Forest SSSI

Site description:
Ashdown Forest contains one of the largest single continuous blocks of lowland heath in south-east England, with both dry heaths and, in a larger proportion, wet heath. The wet heath element provides suitable conditions for several species of bog-mosses Sphagnum spp., bog asphodel Narthecium ossifragum, deergrass Trichophorum capillatum, common cotton-grass Eriophorum angustifolium, marsh gentian Gentiana pneumonanthe and marsh clubmoss Lycopodiella inundata. The site supports important assemblages of beetles, dragonflies, damselflies and butterflies, including the nationally rare silver-studded blue Plebejus argus.

The dry heath in Ashdown Forest is dominated by heather Calluna vulgaris, bell heather Erica cinerea and dwarf gorse Ulex minor, with transitions to other habitats. It supports important lichen assemblages, including species such as Pycnothelia papillaria. This site supports the most inland remaining population of hairy greenweed Genista pilosa in Britain.

The damming of streams, digging for marl, and quarrying have produced several large ponds in a number of areas of the forest. Although often largely free of aquatic vegetation there may be localised rafts of broadleaved pondweed Potamogeton natans, beds of reedmace Typha latifolia and water horsetail Equisetum fluviatile. These species are particularly abundant in the marl pits. Some of the ponds have large amphibian populations, including the great-crested newt Triturus cristatus.

Qualifying habitats: The site is designated under article 4(4) of the Directive (92/43/EEC) as it hosts the following habitats listed in Annex I:

- European dry heaths
- Northern Atlantic wet heaths with Erica tetralix: (Wet heathland with cross-leaved heath)

Qualifying species: The site is designated under article 4(4) of the Directive (92/43/EEC) as it hosts the following species listed in Annex II:

- Great crested newt Triturus cristatus

This citation relates to a site entered in the Register of European Sites for Great Britain.
Register reference number: UK0030080
Date of registration: 14 June 2005
Signed: [Signature]
On behalf of the Secretary of State for Environment, Food and Rural Affairs

Ashdown Forest SAC UK0030080
Compilation date: May 2005 Version: 1
Designation citation Page 1 of 1
Appendix 2b – Citation for Ashdown Forest SPA

EU Directive 79/409 on the Conservation of Wild Birds: Special Protection Area

ASHDOWN FOREST (EAST SUSSEX)

The Ashdown Forest proposed Special Protection Area (pSPA) is an extensive area of common land on mainly sandy soils between East Grinstead and Crowborough in East Sussex. It comprises a mosaic of wet and dry heath, valley bog and woodland, and supports several uncommon plants, a rich invertebrate fauna and nationally important numbers of breeding nightjar and Dartford warbler. The boundary of the pSPA is coincident with that of the Ashdown Forest Site of Special Scientific Interest.

The site qualifies for designation under Article 4.1 of the EU Birds Directive by regularly supporting nationally important breeding populations of two Annex 1 species. The site supports 35 pairs of nightjar Caprimulgus europaeus (1991-92 survey), representing 1.1% of the British population, and 20 pairs of Dartford warbler Sylvia undata (1994 survey), representing 2.1% of the British population. Other regularly occurring Annex 1 species include woodlark Lullula arborea, heron Ardea cinerea and great grey shrike Lanius excubitor.

The diverse range of heathland and woodland habitats on the site supports an important assemblage of breeding species, some of which have declined in England over recent years. Notable species regularly breeding on the site include hobby Falco subbuteo, tree pipit Anthus trivialis, redstart Phoenicurus phoenicurus, stonechat Saxicola torquata and wood warbler Phylloscopus sibilatrix, in addition to nightjar and Dartford warbler.

SPA Citation
IOC
May 1994
Appendix 2c – Citation for Mole Gap to Reigate Escarpment SAC

EC Directive 92/43 on the Conservation of Natural Habitats and of Wild Fauna and Flora

Citation for Special Area of Conservation (SAC)

Name: Mole Gap to Reigate Escarpment
Unitary Authority/County: Surrey
SAC status: Designated on 1 April 2005
Grid reference: TQ199533
SAC EU code: UK0012804
Area (ha): 887.68
Component SSSI: Mole Gap to Reigate Escarpment SSSI

Site description:
Woodland, chalk grassland, chalk scrubs and heathland form an interrelated mosaic at this site on the North Downs.

On the generally acidic plateau deposits of the crest of the Downs, the woodland is dominated by beech Fagus sylvatica, pedunculate oak Quercus robur, ash Fraxinus excelsior and yew Taxus baccata. On the lime-rich chalk slopes, the dominant trees are beech, ash and yew, together with field maple Acer campestre and common whitebeam Sorbus aria agg and occasional large-leaved lime Tilia platyphyllos. Yew woodland has been formed both by invasion of chalk grassland and from development within beech woodland following destruction of the beech overstorey. Yew occurs in extensive stands, with, in places, an understorey of box Buxus sempervirens. This site supports the only area of stable box scrub in the UK, on steep chalk slopes where the River Mole has cut into the North Downs Escarpment, creating the Mole Gap. Here natural erosion maintains the open conditions required for the survival of this habitat type.

The site supports a range of species-rich chalk grassland types on steep slopes, dominated by red fescue Festuca rubra, sheep s-fescue F. ovina, quaking-grass Briza media and, in taller areas, upright brome Bromopsis erecta, tox-grass Brachypodium pinnatum and slender false-brome grass Brachypodium sylvaticum. Typical herbs include salad burnet Sanguisorba minor, yellow-wort Blackstonia perfoliata and field scabious Knautia arvensis. The site supports important populations of the nationally scarce moss orchid Himantophyllum monorchis and man orchid Acras anthropophorum, the former occurring in areas of shorter turf. A range of more widespread but local orchids are also present, including autumn lady’s-tresses Spiranthes spiralis and green-winged orchid Orchis morio, as well as commoner species, such as pyramidal orchid Anacamptis pyramidalis, fragrant orchid Gymnadenia conopsea and bee orchid Ophrys apifera.

The acidic plateau deposits on Headley Heath support acidic heathland, dominated by heather Calluna vulgaris, bell heather Erica cinerea and dwarf gorse Ulex minor, often mixed with grasses such as wavy hair-grass Deschampsia flexuosa and common bent Agrostis capillaris. Chalk heath occurs on a small area of Headley Heath where the special conditions allow both acid and lime-loving plants to grow side by side.

An old chalk mine is used as a winter roost by several species of bats.
Appendix 3 – Site of Special Scientific Interest Condition Analysis

Appendix 3a – Ashdown Forest SSSI

Site: Ashdown Forest SSSI

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<th>Sites</th>
<th>Units</th>
<th>Units Assessed</th>
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<td>127</td>
<td>127</td>
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| Total area (ha) | 3,213.09 | 3,213.12 | 3,213.12 |

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<th>Unfavourable No change</th>
<th>Unfavourable Declining</th>
<th>Partially destroyed</th>
<th>Destroyed</th>
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Condition Summary

- Favourable
- Unfavourable - Recovering
- Unfavourable - Declining
Appendix 3b – Mole Gap to Reigate Escarpment SSSI

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<th>Sites</th>
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<th>Favourable - Recovering</th>
<th>Unfavourable - No change</th>
<th>Unfavourable - Declining</th>
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<td>46.71%</td>
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</table>

Condition Summary:

- Favourable
- Unfavourable - Recovering
- Unfavourable - No change