Habitats Regulations Assessment of the Crawley Borough Council Local Plan

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Report to Inform the HRA

January 2021

LEPUS CONSULTING
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY

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Abbreviations

AA	Appropriate Assessment
AADT	Annual Average Daily Traffic
ALS	Abstraction Licence Strategy
APIS	Air Pollution Information System
CAMS	Catchment Abstraction Management Strategy
CJEU	Court of Justice of the European Union
DfT	Department for Transport
DMRB	Design Manual for Roads and Bridges
DTA	David Tyldesley and Associates
EEC	European Economic Community
EU	European Union
EUNIS	European Nature Information System
GIS	Geographic Information System
ha	Hectares
HDV	Heavy Duty Vehicles
HRA	Habitats Regulations Assessment
IRZ	Impact Risk Zone
IUCN	International Union for Conservation of Nature
JNCC	Joint Nature Conservation Committee
LPA	Local Planning Authority
LSE	Likely Significant Effect
N	Nitrogen
NE	Natural England
NO_2	Nitrogen Dioxide
NOx	Nitrogen Oxides
NPPF	National Planning Policy Framework
NPPG	National Planning Practice Guidance
OAHN	Objectively Assessed Housing Need
PRoW	Public Right of Way
RBMP	River Basin Management Plan
RSPB	Royal Society for the Protection of Birds
SAC	Special Area of Conservation
SIP	Site Improvement Plan
SPA	Special Protection Area
SPZ	Source Protection Zone

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SSSI	Site of Special Scientific Interest
SuDS	Sustainable Urban Drainage
UK	United Kingdom
WwTW	Waste Water Treatment Works
WCS	Water Cycle Study
WFD	Water Framework Directive
WRMP	Water Resource Management Plan
WWT	Wildfowl and Wetlands Trust

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1 Introduction

1.1 HRA of the Crawley Local Plan

1.1.1 The Crawley Borough Council Local Plan, Crawley 2030[1], was adopted in December 2015. It forms the Council's development plan and sets the planning policies under which development management decisions are taken.

1.1.2 Crawley Borough Council (hereafter referred to as the Council) is currently reviewing the adopted Local Plan as it reaches its five-year date from adoption. This review takes into consideration an emerging technical evidence base, national legislation, revisions to the National Planning Policy Framework (NPPF)[2] and National Planning Practice Guidance (NPPG)[3]. The Crawley Local Plan extends across the whole of the Council area (referred to hereafter as the 'Plan area'). Many of the proposed developments identified and allocated through the adopted Local Plan, Crawley 2030, will be continued in the new Local Plan[4].

1.1.3 Lepus Consulting has prepared this report to inform the Habitats Regulations Assessment (HRA) of the Crawley Local Plan (referred to hereafter as the 'Local Plan') on behalf of the Council. At the time of commissioning the HRA (August 2020), the draft Local Plan had been published for an initial Regulation 19 consultation (January 2020). This draft HRA report is based on an internal emerging draft of the Local Plan, which was prepared in September 2020, following the initial Local Plan Regulation 19 Consultation that was carried out in January 2020.

1.1.4 The HRA process has been undertaken alongside the plan making process in an iterative and informative manner. The final HRA report will be prepared using the emerging air quality and water resource evidence base. It will reflect the most recent version of the Local Plan that was published for a further stage of Regulation 19 public consultation in January 2021.

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[1] Crawley Borough Council. December 2015. Crawley 2030. Crawley Borough Council Local Plan. 2015 – 2030.

[2] Ministry of Housing, Communities & Local Government (2019) National Planning Policy Framework. Available at: https://www.gov.uk/government/publications/national-planning-policy-framework--2 [Date Accessed: 27/01/20]

[3] National Planning Practice Guidance. Available at: https://www.gov.uk/government/collections/planning-practice-guidance [Date Accessed: 27/01/20]

[4] Crawley Borough Council. September 2020. Draft Crawley Borough Local Plan 2021 – 2036. For Submission Publication Consultation: November – December 2020

1.1.5 The HRA has been prepared in accordance with the Habitats Regulations (as amended)[5,6,7,8]. When preparing development plan documents, Councils are required by law to carry out an HRA. The requirement for authorities to comply with the Habitats Regulations when preparing a Local Plan is also noted in the Government's online planning practice guidance[9].

1.2 The HRA process

1.2.1 The HRA process assesses the potential effects of a plan or project on the conservation objectives of European sites designated under the Habitats[10] and Birds[11] Directives. These sites form a system of internationally important sites throughout Europe known collectively as the 'Natura 2000 Network'. In line with the Habitats Regulations, UK sites which were part of the Natura 2000 Network before leaving the EU have become part of the National Site Network. The Habitats Regulations provide a definition of a European site[12] at Regulation 8 as follows[13].:

- A Special Area of Conservation (SAC);
- A Site of Community importance which has been placed on the list referred to in the third sub-paragraph of Article 4(2) of the Habitats Directive (list of sites of Community importance);
- A site hosting a priority natural habitat type or priority species protected in accordance with Article 5(4) of the Habitats Directive (a site in respect of which consultation has been initiated under Article 5(1) of that Directive, during the consultation period or pending a decision of the Council under Article 5(3));
- An area classified pursuant to Article 4(1) or (2) of the old Wild Birds Directive or the new Wild Birds Directive (classification of Special Protection Areas (SPA); or
- A site which has been proposed to the European Commission under regulation 12, until such time as—
    - The site is placed on the list of sites of Community importance referred to in the third sub-paragraph of Article 4(2) of the Habitats Directive; or

[5] The Conservation of Habitats and Species Regulations 2017 SI No. 2017/1012, TSO (The Stationery Office), London. Available at: https://www.legislation.gov.uk/uksi/2017/1012/contents [Date Accessed: 28/07/20]

[6] The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. Available at: https://www.legislation.gov.uk/ukdsi/2019/9780111176573 [Date Accessed: 07/08/20]

[7] The Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018. Available at: https://www.legislation.gov.uk/uksi/2018/1307/made [Date Accessed: 06/01/21]

[8] The Habitats Regulations continues to have effect in domestic law after the 31st December Implementation Period Completion day when the UK left the European Union (EU). This is implemented through both the European Union (Withdrawal) Act 2018 (https://www.legislation.gov.uk/ukpga/2018/16/contents/enacted) and the European Union (Withdrawal Agreement) Act 2020 (https://www.legislation.gov.uk/ukpga/2020/1/contents).

[9] Ministry of Housing, Communities and Local Government (July 2019) Planning Practice Guidance Note, Appropriate Assessment, Guidance on the use of Habitats Regulations Assessment

[10] Official Journal of the European Communities (1992). Council Directive 92 /43 /EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora.

[11] Official Journal of the European Communities (2009). Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds.

[12] The term European site is taken here to include both European sites and European marine sites.

[13] The Conservation of Habitats and Species Regulations 2017 SI No. 2017/1012, TSO (The Stationery Office), London. Available at: https://www.legislation.gov.uk/uksi/2017/1012/contents [Date Accessed: 28/07/20]

- Agreement is reached or a decision is taken pursuant to Article 4(2) of that Directive not to place the site on that list[14].

1.2.2 In addition, policy in England and Wales notes that the following sites should also be given the same level of protection[15]:

- A potential SPA (pSPA);
- A possible / proposed SAC (pSAC);
- Listed and proposed Ramsar Sites; and
- In England, sites identified or required as compensation measures for adverse effects on statutory European sites, pSPA, pSAC and listed or proposed Ramsar sites.

1.2.3 This report refers to both statutory sites and sites protected through national policy as a European site. Regulation 63 of the Habitats Regulations notes a competent authority, before deciding to undertake, or give any consent, permission or other authorisation for, a plan or project, must make an appropriate assessment of the implications of the plan or project for that site in view of that site's conservation objectives. The tests are referred to collectively as a Habitats Regulations Assessment (HRA).

1.2.4 This applies to plans or projects which are likely to have a significant effect on a European site (either alone or in combination with other plans or projects), and / or not directly connected with or necessary to the management of that site.

1.2.5 There is no set methodology or specification for carrying out and recording the outcomes of the assessment process. The Habitats Regulations Assessment Handbook, produced by David Tyldesley Associates (referred to hereafter as the 'DTA Handbook'), provides an industry recognised good practice approach to HRA. The DTA Handbook, and in particular 'Practical Guidance for the Assessment of Plans under the Regulations'[16], which forms part F, has therefore been used to prepare this report. The DTA Handbook is used by Natural England, the Government's statutory nature conservation organisation and is widely considered to be an appropriate basis for the HRA of plans.

1.2.6 A step-by-step guide to the methodology adopted in this assessment, as outlined in the DTA Handbook, is illustrated in **Figure 1.1**. In summary, the four key stages of the HRA process are as follows:

- **Stage 1. Screening:** Screening to determine if the Local Plan would be likely to have a significant effect on a European site. This stage comprises the identification of potential effects associated with the Local Plan on European sites and an assessment of the likely significance of these effects.
- **Stage 2. Appropriate Assessment and the 'Integrity Test':** Assessment to ascertain whether or not the Local Plan would have a significant adverse effect

[14] It is noted that there may be changes and effects to the Habitat Regulations as a result of the UK's departure from the EU.

[15] Ministry of Housing, Communities & Local Government (2019). National Planning Policy Framework. Para 176. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf [Date Accessed: 05/01/21]

[16] Tyldesley, D., and Chapman, C. (2013) The Habitats Regulations Assessment Handbook (September) (2013) edition UK: DTA Publications Limited. Available at: www.dtapublications.co.uk

on the integrity of any European site to be made by the Competent Authority (in this instance the Crawley Borough Council). This stage comprises an impact assessment and evaluation in view of a European site's conservation objectives. Where adverse impacts on site integrity are identified, consideration is given to alternative options and mitigation measures which are tested.

- **Stage 3. Alternative solutions:** Deciding whether there are alternative solutions which would avoid or have a lesser effect on a European site.
- **Stage 4. Imperative reasons of overriding public interest and compensatory measures:** Considering imperative reasons of overriding public interest and securing compensatory measures.

1.2.7 This report presents the methodology and findings of Stages 1 and 2 of the HRA process.

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1.2.8 This report is structured as follows:

- **Chapter 1:** Introduction;
- **Chapter 2:** Local Plan;
- **Chapter 3:** Methodology;
- **Chapter 4:** Scope of the HRA;
- **Chapter 5:** European sites;
- **Chapter 6:** Screening;
- **Chapters 7 to 8:** Appropriate Assessment; and
- **Chapter 9:** Conclusion.

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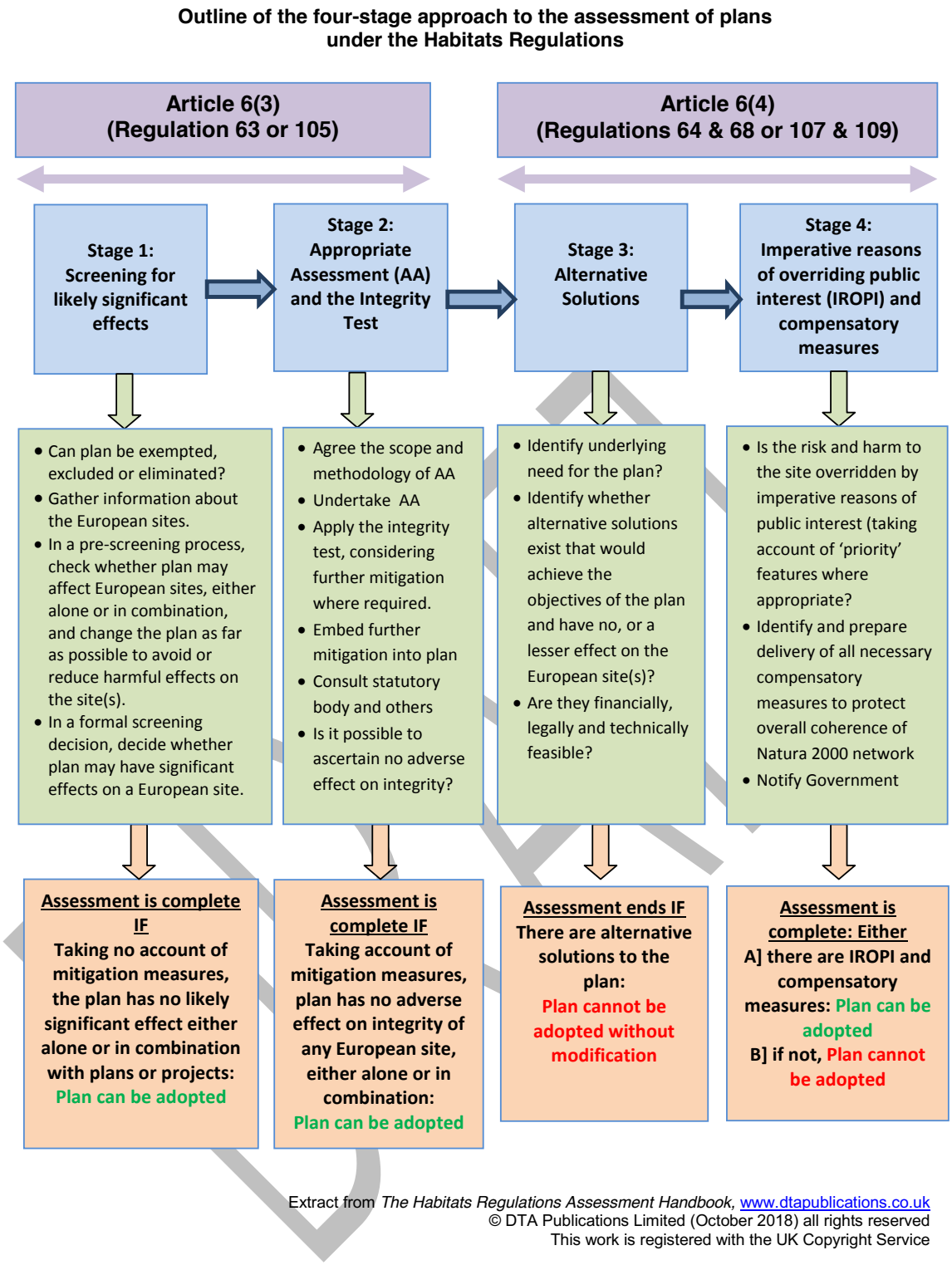

Figure 1.1: *Stages in the Habitats Regulations Assessment process*[17].

[17] Tyldesley, D., and Chapman, C. (2013) The Habitats Regulations Assessment Handbook (October) (2018) edition UK: DTA Publications Limited. Available at: www.dtapublications.co.uk

2 Local Plan

2.1 Crawley Local Plan Review

2.1.1 The Council is in the process of undertaking a review of its Local Plan. The adopted Local Plan covers the period up to 2030[18]. The Local Plan review began in 2019, in line with government requirements that Local Plans should be updated every five years. Following the review, the emerging Local Plan will cover the period to 2036. As set out in paragraph 1.1.3, subsequent updates to the draft Local Plan will be addressed through the final version of the HRA report. This will include an assessment of the implication in relation to the extended plan period.

2.1.2 The Local Plan will replace the adopted Local Plan – Crawley 2030 – and will provide a clear indication of the Council's approach to the development of the town, including helping to support the delivery of key priorities: wellbeing and communities, economic growth and social mobility, housing delivery and environmental sustainability.

2.2 Background to the Local Plan development

2.2.1 The emerging Local Plan contains strategic and non- strategic planning policies and principles to help shape the future of the town. Some of the Policies are proposed to be retained from the existing adopted Local Plan, others have been changed, and some new policies have been proposed.

2.2.2 In 2019, the Council undertook an exercise of early engagement through the consultation version of the Regulation 18 draft Local Plan[19]. It set out emerging draft strategic and non-strategic planning policies and principles to help shape the future of the town. It also set out a series of consultation questions at the start of each topic chapter, and more detailed questions after each Policy upon which consultation was sought.

2.2.3 Consultation on a Regulation 19 Submission draft of the Local Plan was undertaken between 20 January and 2 March 2020[20]. This document took into consideration the evidence produced in support of the Local Plan and also findings from the Regulation 18 stage of consultation.

2.2.4 The Council is now consulting on another round of Regulation 19 consultation – Local Plan Submission Publication Consultation: November to December 2020 – which takes into consideration an up to date evidence base regarding the economic, social and environmental characteristics, needs and prospects of the Plan area.

[18] Crawley Borough Council. 2015. Adopted Crawley Borough Local Plan 2015 – 2030.

[19] Crawley Borough Council. 2019. Draft Crawley Borough Local Plan 2020 – 2035 June 2019 For Early Engagement Consultation July – September 2019.

[20] Crawley Borough Council. 2020. Crawley 2035. Draft Crawley Borough Local Plan 2020 – 2035 January 2020 For Submission Publication Consultation: January – March 202

2.3 Local Plan policies and allocations

2.3.1 The policies that form the Local Plan sit under a number of themes as follows:

- Homes and jobs;
- Provision of retail, leisure and other commercial development;
- Provision of infrastructure for transport, telecommunications, water supply, wastewater, flood risk management, and energy;
- Provision of community, social and cultural infrastructure and other local facilities;
- Climate change mitigation and adaptation;
- Conservation and enhancement of the natural, built and historic environment, including landscape and green infrastructure1; and
- Control of Gatwick Airport.

2.3.2 A full list of the proposed policies including site allocations are presented in **Appendix E**.

2.4 Previous HRA work

2.4.1 The Local Plan Review is well-progressed having been subject to two previous stages of formal public consultation.

2.4.2 HRA work was undertaken in support of the adopted Local Plan and also alongside the Local Plan review. The purpose of this was to identify any aspects of the Local Plan that would have the potential to cause a likely significant effect on a number of European sites either in isolation or in-combination with other plans and projects and assess these impacts on site integrity. HRA work that has been undertaken to support of these previous stages is as follows:

- Adopted Local Plan HRA: Habitats Regulations Assessment Screening Report for the Crawley Borough Local Plan Review (Crawley Borough Council, November 2013).
- Local Plan review: Habitats Regulations Assessment Screening Report for the Crawley Borough Local Plan Review (Crawley Borough Council, July 2019); and
- Local Plan Review: Habitats Regulations Assessment Screening Report for the Crawley Borough Local Plan Review (Crawley Borough Council, January 2020).

2.4.3 **Table 2.1** provides a summary of the HRA work that was undertaken to support the plan making process.

Table 2.1: *Summary of Local Plan HRA assessment work*

HRA Report	Summary of findings
Adopted Local Plan HRA: Habitats Regulations Assessment Screening Report for the Crawley Borough Local Plan Review Crawley Borough Council November 2013	This report was prepared in support of the Adopted Local Plan. It reports upon an HRA screening exercise that was undertaken to identify Likely Significant Effects (LSE) of the Local Plan (alone or in-combination) on any European site. It highlighted a study area of 15km and identified other sites outside this zone where potential pathways of impact exist. The following European sites were included in the assessment: - Ashdown Forest SPA; - Ashdown Forest SAC; - Mole Gap to Reigate Escarpment SAC; and - South West London Waterbodies SPA.

HRA Report	Summary of findings
	The South West London Waterbodies SPA and Ramsar was screened out due to its distance from the plan area and the Environment Agency's abstraction and discharge consent processes which were considered suitable to avoid impacts to water levels and quality at these sites. The assessment focused on the following LSEs: - Increased traffic – leading to increased air pollution, which could affect species that are sensitive to air quality (e.g. lichens); - Increased recreational visits – possibly with associated disturbance of fauna and impacts on the habitats (e.g. through trampling); - Changes to water levels along the Mole Valley; and - Changes to water quality along the Mole Valley. Alone and in-combination traffic impacts were screened out due to the minor contribution of the Local Plan to increased road traffic on road links close to Ashdown Forest SAC and SPA. It is noted that this assessment was made before the Wealden judgement (see Box 2). Visitor survey data was analysed as part of the assessment to determine recreational LSEs at Ashdown Forest SAC and SPA. This survey data established a 7km zone of influence within which recreational LSEs were expected. At its closest point, Crawley Borough is 10km away from the Ashdown Forest SAC and SPA. This combined with a review of closer alternative recreation and open space resulted in LSEs being screened out. A similar review of visitor survey data at Mole Gap to Reigate Escarpment SAC confirmed that low numbers of residents from Crawley were expected to visit the SAC. This combined with a review of closer alternative recreation and open space resulted in LSEs being screened out. A review of the Environment Agency's abstraction and discharge consent processes along-side consideration of water efficiency measures and the pre-treatment of water resulted in water level and water quality LSEs being screened out. The Council concluded that the possible effects of the Local Plan would not have a significant adverse impact (either on their own or 'in combination' with other plans) on the European Sites considered as part of the Screening Report.
Local Plan review: Habitats Regulations Assessment Screening Report for the Crawley Borough Local Plan Review Crawley Borough Council July 2019	At Regulation 18, as part of the current Local Plan review, an HRA Screening Report was undertaken to support the emerging draft version of the Plan. This report adopted the same study area as the HRA that was undertaken in support of the Adopted Local Plan (above), focusing on the same European sites and potential impact pathways. This was due to the similarities between the adopted and emerging plan review. LSEs associate with recreational at Mole Valley to Reigate SAC and Ashdown Forest SAC and SPA and hydrology impacts at South West London Waterbodies SPA and Mole Valley to Reigate SAC were screened out on the basis of the rationale set out for the Adopted Local Plan HRA as detailed above. In terms of air quality LSEs at Ashdown Forest SPA and SAC, following the Wealden Judgement (Box 2) in respect of in-combination effects, and in light of joint working that has since been undertaken in the Ashdown Forest Authority area through the Ashdown Forest Working Group, the Screening Report indicates that there is a need to undertake further investigation to fully understand possible impacts on the European Sites from the Local Plan Review both on its own and in combination with other Plans.
Local Plan Review: Habitats Regulations Assessment Screening Report for the Crawley Borough Local Plan Review Crawley Borough Council January 2020	An HRA Screening Report update was undertaken in January 2020 in support of the previous round Regulation 19 consultation. This drew on the same study area and assessed the same range of LSEs as the Regulation 18 version of the HRA (above). LSEs associate with recreational at Mole Valley to Reigate SAC and Ashdown Forest SAC and SPA and hydrology impacts at South West London Waterbodies SPA and Mole Valley to Reigate SAC were screened out on the basis of the rationale set out for the Adopted Local Plan HRA as detailed above. As above, in light of the Wealden Judgement, in-combination air quality LSEs at Ashdown Forest SPA and SAC were screened in.

2.4.4 HRA related representations were received from Mid Sussex District Council, Reigate and Banstead Borough Council and Sussex Ornithological Society, as part of the statutory public consultation held in January 2020, on the draft HRA Screening Report. No comments were received from Natural England or the Environment Agency. However, following receipt of additional information, the Gatwick Water Cycle Study (WCS), Natural England issued correspondence expanding on their original response. **Table 2.2** provides a summary of all responses received to date on the HRA and an indication of how these have been taken into consideration in the assessment process.

Table 2.2: *Review of HRA related representations*

Organisation	Summary of representation	How this has been taken into consideration in the HRA
Natural England Letter dated 18th September 2019 REP211/950	Natural England indicated their agreement with the findings of the July 2019 HRA Draft HRA Screening Report.	No further action required.
Natural England Letter dated 2nd March 2020 REP/069	Natural England indicated their agreement with the findings of the January 2020 HRA Screening Report.	No further action required.
Natural England Letter dated 28th July 2020	Natural England highlight potential for LSEs associated with water quantity and water quality impacts from the Local Plan on the Arun Valley SAC, SPA and Ramsar and the need to consider these impacts with the Local Plan HRA in more detail. This relates to the requirement to consider the implications of the CJEU's judgment on the Coöperative Mobilisation case[21] (the 'Dutch Nitrogen cases'') in terms of water issues from development pressure and reliance on strategic plans for reducing such impacts. In terms of water resource issues, this advice is based on an evidence review of the Hardham groundwater abstraction, which supplies Southern Water's Sussex North supply area within the Crawley Borough Council area. In terms of water quality, this advice is in relation to a potential deterioration associated with discharges from waste water treatment works (WWTW), which may be exacerbated by additional development pressure.	Detailed assessment work is currently underway (through the HRA Appropriate Assessment process) to address NE's concerns in relation to water quantity and water quality impacts from the Local Plan at the Arun Valley SAC, SPA and Ramsar. In addition, ongoing consultations are being undertaken with affected authorities, water companies and NE.
Sussex Ornithological Society REP162/566 (Regulation 18 Representation – 14 September 2019)	SOS agrees that an Appropriate Assessment is not required.	No further action required.

[21] http://curia.europa.eu/juris/liste.jsf?language=en&num=C-293/17

Organisation	Summary of representation	How this has been taken into consideration in the HRA
Sussex Ornithological Society REP/022 (Regulation 19 Representation – 2 March 2020)	The SOS representation relates to the 5925 houses which will be delivered in neighbouring Local Authority areas under the Duty to Cooperate obligations, as an urban extension adjacent to Crawley's boundaries. Key concerns relate to scarce birds of conservation concern, as well as wider adverse biodiversity impacts.	The HRA has focused specifically upon European designations and their functionally linked land. Impacts on wider biodiversity and landscape features are addressed in the Local Plan Sustainability Appraisal under Sustainability Objective number six (to conserve and enhance the biodiversity habitats, key landscape features, fauna and flora within the borough)[22].
Reigate & Banstead Borough Council REP/058 (Regulation 19 Representation – 2 March 2020)	The Council notes that due to the findings of the Lewes and South Downs Joint Core Strategy 2017 Legal Challenge in relation to how "in-combination" effects are considered that CBC will do further work to understand the possible impacts on the European sites arising from the Regulation 19 Crawley Borough Local Plan and "in-combination" with other plans. In particular, the Council notes that as part of the preparation / examination of their DMP, mitigation measures to protect the foraging habitat referred to as a 'functional linkage' of Bechstein's bats surrounding the Mole Gap to Reigate Escarpment SAC was taken into consideration.	The HRA will take into consideration in-combination air quality effects taking into consideration the Wealden Judgement and Natural England's current guidance on the assessment of air quality effects[23]. Detailed air quality modelling work is currently underway to inform the HRA Appropriate Assessment. This work has also been informed by the guidance and methodologies set out within the Ashdown Forest Statement of Common Ground (SoCG)[24]. The HRA has taken into consideration the People Over Wind judgement in terms of the consideration of mitigation measures as set out in Box 1. A review of traffic data in relation to all European sites vulnerable to air quality impacts has been considered as part of the HRA. This has included Ashdown Forest SPA and SAC and also Mole Gap to Reigate Escarpment. Consideration has been given to potential impacts on areas of functionally linked habitat for Bechstein's bat.
Mid Sussex District Council REP/066 (Regulation 19 Representation – 2 March 2020)	Mid Sussex note the following: - The requirement to consider traffic distributions across the whole road network, rather than only considering a defined study area e.g. a 10km study area. - The requirement to consider thresholds both alone and in-combination. - The requirement to consider updated evidence including the Mid Sussex Transport Model (2019) which has been prepared to support preparation of the Mid Sussex Site Allocations DPD.	Air quality screening has been undertaken in line with the requirements of NE's guidance and methodologies set out in the Ashdown Forest SoCG. Detailed air quality modelling work is currently underway. This will ensure that all development with the potential to contribute to increased traffic emissions at a European site will be considered in the air quality assessment. This will ensure that the Wealden Judgement (**Box 2**) is taken into consideration in terms of in-combination thresholds.

[22] Crawley Borough Council. January 2021. Local Plan Review. Sustainability Appraisal/ Strategic Environmental Assessment. Draft Report for the Submission Local Plan.

[23] Natural England (2018) Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (NEA001). Available at: http://publications.naturalengland.org.uk/publication/4720542048845824 [Date Accessed: 04/09/20]

[24] Ashdown Forest Statement of Common Ground. April 2018.

2.5 Purpose of report

2.5.1 The purpose of this report is to inform the HRA of this stage of the Local Plan using best available information. The Council, as the Competent Authority, will have responsibility to make the Integrity Test. This can be undertaken in light of the conclusions set out in this report, having regard to representations made by Natural England.

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3 Methodology

3.1 HRA Guidance

3.1.1 As noted above, the application of HRA to land-use plans is a requirement of the Conservation of Habitats and Species Regulations 2017 (as amended)[25], the UK's transposition of European Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the Habitats Directive). HRA applies to plans and projects, including all Local Development Documents in England and Wales.

3.1.2 This report has been informed by the following guidance:

- Planning Practice Guidance: Appropriate Assessment[26]; and
- The Habitat Regulations Assessment Handbook - David Tyldesley and Associates (referred to hereafter as the DTA Handbook), 2013 (in particular Part F: '*Practical Guidance for the Assessment of Plans under the Regulations'*).

3.2 HRA methodology

3.2.1 HRA is a rigorous precautionary process centred around the conservation objectives of a European site's qualifying interests. It is intended to ensure that designated European sites are protected from impacts that could adversely affect their integrity, as required by the Birds and Habitats Directives. A step-by-step guide to this methodology is outlined in the DTA Handbook and has been reproduced in **Figure 1.1**. This report comprises Stages 1 and 2 of the HRA process.

3.3 Stage 1: Screening for likely significant effects

3.3.1 The first stage in the HRA process comprises the screening stage. This process identifies likely significant effects (LSEs) of a plan or project upon a European site, either alone or in combination with other plans or projects. This stage considers the potential 'significance' of adverse effects. Where elements of the plan will not result in an LSE on a European site these may be screened out and not considered in further detail in the process.

3.3.2 The screening stage follows a number of steps which are outlined in **Figure 3.1**.

[25] The Conservation of Habitats and Species Regulations (Various Amendments) (England and Wales) 2018. Regulation SI No. 1307.

[26] Ministry of Housing, Communities and Local Government (July 2019) Planning Practice Guidance Note, Appropriate Assessment, Guidance on the use of Habitats Regulations Assessment

Outline of the steps in stage 1, the whole of the screening process

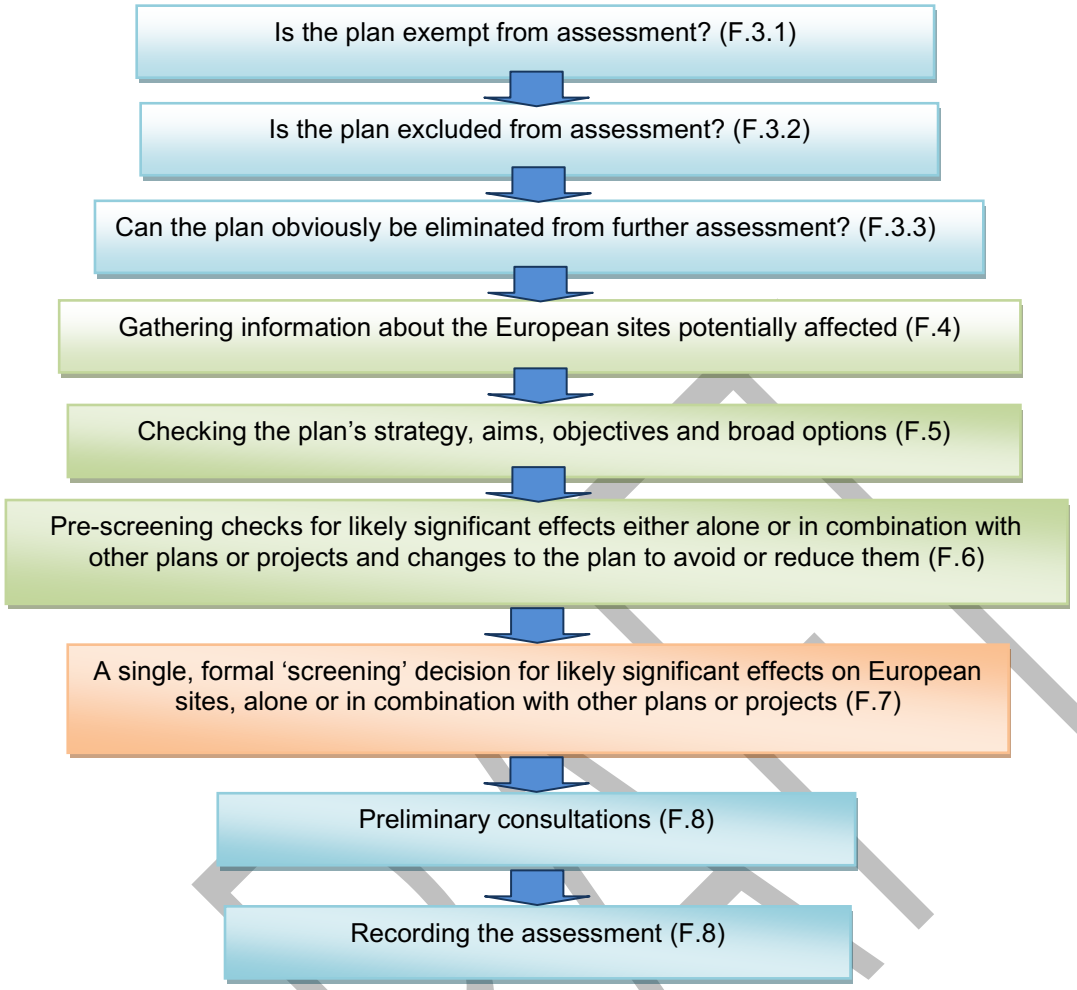

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Figure 3.1: *Outline of steps in stage 1; the whole screening process.*

3.3.3 The screening process uses a number of evaluation codes to summarise whether or not a plan component is likely to have significant effects alone or in-combination, see **Table 3.1.**

Table 3.1: *Assessment and reasoning categories from Part F of the DTA Handbook*

Assessment and reasoning categories from Chapter F of The Habitats Regulations Assessment Handbook (DTA Publications, 2013):
A. General statements of policy / general aspirations.
B. Policies listing general criteria for testing the acceptability / sustainability of proposals.
C. Proposal referred to but not proposed by the plan.
D. General plan-wide environmental protection / site safeguarding / threshold policies
E. Policies or proposals that steer change in such a way as to protect European sites from adverse effects.
F. Policies or proposals that cannot lead to development or other change.
G. Policies or proposals that could not have any conceivable or adverse effect on a site.
H. Policies or proposals the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects).
I. Policies or proposals with a likely significant effect on a site alone.
J. Policies or proposals unlikely to have a significant effect alone.
K. Policies or proposals unlikely to have a significant effect either alone or in combination.
L. Policies or proposals which might be likely to have a significant effect in combination.
M. Bespoke area, site or case-specific policies or proposals intended to avoid or reduce harmful effects on a European site.

3.4 What is a Likely Significant Effect?

3.4.1 HRA screening provides an analysis of LSEs identified during the HRA screening process. It considers the nature, magnitude and permanence of potential effects in order to inform the plan making process.

3.4.2 The DTA Handbook guidance provides the following interpretation of LSEs:

3.4.3 *"In this context, 'likely' means risk or possibility of effects occurring that cannot be ruled out on the basis of objective information. 'Significant' effects are those that would undermine the conservation objectives for the qualifying features potentially affected, either alone or in combination with other plans or projects… even a possibility of a significant effect occurring is sufficient to trigger an 'appropriate assessment'"*[27].

3.4.4 With reference to the conservation status of a given species in the Habitats Regulations, the following examples would be considered to constitute a significant effect:

- Any event which contributes to the long-term decline of the population of the species on the site;
- Any event contributing to the reduction, or to the risk of reduction, of the range of the species within the site; and
- Any event which contributes to the reduction of the size of the habitat of the species within the site.

[27]Tyldesley, D. (2013) The Habitats Regulations Assessment Handbook – Chapter F. DTA Publications

3.4.5 Rulings from the 2012 'Sweetman'[28] case provide further clarification:

3.4.6 "*The requirement that the effect in question be 'significant' exists in order to lay down a de minimis threshold. Plans or projects that have no appreciable effect on the site are thereby excluded. If all plans or projects capable of having any effect whatsoever on the site were to be caught by Article 6(3), activities on or near the site would risk being impossible by reason of legislative overkill*".

3.4.7 Therefore, it is not necessary for the Council to show that the Local Plan will result in no effects whatsoever on any European site. Instead, the Council is required to show that the Local Plan, either alone or in-combination with other plans and projects, will not result in an effect which undermines the conservation objectives of one or more qualifying features.

3.4.8 Determining whether an effect is significant requires careful consideration of the environmental conditions and characteristics of the European site in question, as per the 2004 'Waddenzee'[29] case:

3.4.9 *"In assessing the potential effects of a plan or project, their significance must be established in the light, inter alia, of the characteristics and specific environmental conditions of the site concerned by that plan or project*".

3.5 In-combination effects

3.5.1 As well as considering the LSEs of the Local Plan policies alone on European sites at the screening stage, it is also necessary to consider whether the effects of the policies in-combination with other plans and projects would combine to result in an LSE on any European site. It may be that the Local Plan alone may not have a significant effect but could have a residual effect that may contribute to in-combination effects on a European site.

3.5.2 The in-combination assessment presented in Chapter F of the DTA Handbook comprises a ten-step approach as illustrated in **Figure 3.2** below.

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[28] Source: EC Case C-258-11 Reference for a Preliminary Ruling, Opinion of Advocate General Sharpston 'Sweetman' delivered on 22nd November 2012 (para 48)

[29] Source: EC Case C-127/02 Reference for a Preliminary Ruling 'Waddenzee' 7th Sept 2004 (para 48)

Outline of the in-combination pre-screening assessment methodology

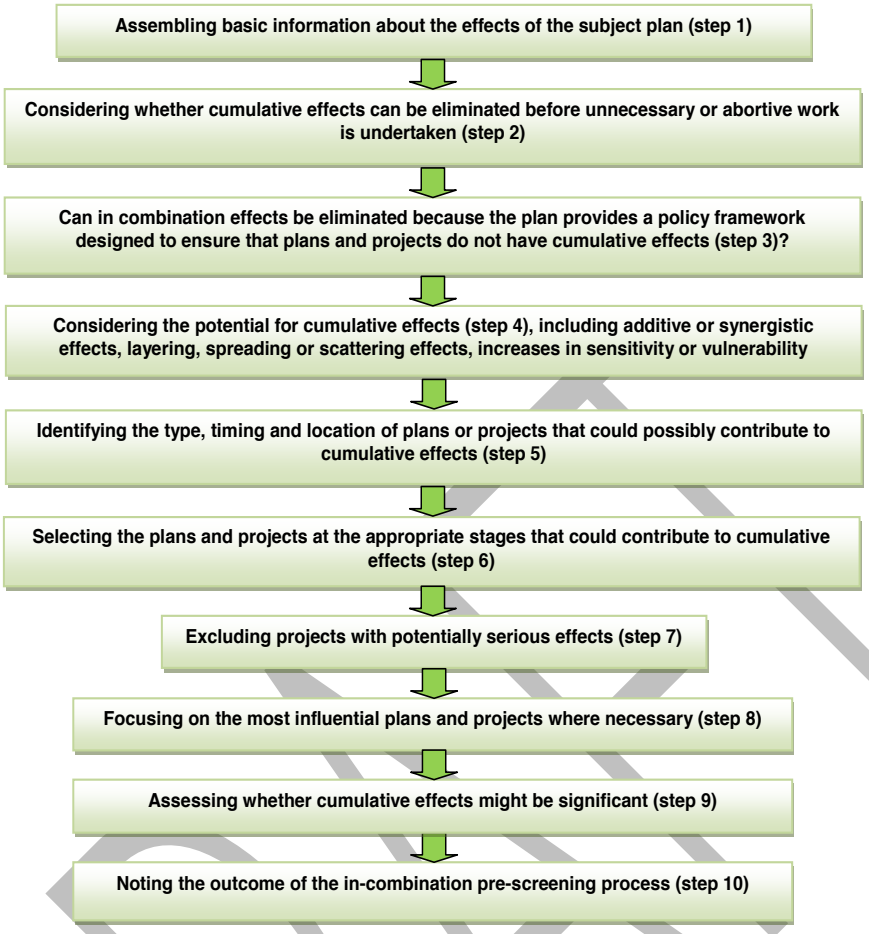

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Figure 3.2: *Outline of the in-combination pre-screening assessment methodology*

3.5.3 Plans and projects which are considered to be of most relevance to the in-combination assessment of the Local Plan include those that have similar impact pathways. These include those plans that have the potential to increase development in the HRA study area. In addition, other plans and projects with the potential to increase traffic across the study area which may act in-combination with the Local Plan, such as transport, waste and mineral plans and projects, have also been taken into consideration. Plans which allocate water resources or are likely to influence water quality in the study area have also been considered. Finally, neighbouring authority local plans which may increase development public access and disturbance pressures at European sites have also been considered.

3.5.4 The following neighbouring local authorities' Local Plans and other relevant plans and projects and their HRA work was reviewed as part of this assessment.

- Reigate to Banstead Borough Council;
- Mid Sussex District Council;
- Horsham District Council;
- Tandridge District Council;
- Mole Valley District Council;
- Brighton and Hove City Council;
- Lewes District Council;

- Eastbourne Borough Council;
- Rother District Council;
- Sevenoaks District Council;
- South Downs National Park;
- Tunbridge Wells Borough Council;
- Wealden District Council;
- Epsom and Ewell District Council;
- Chichester District Council;
- South Downs National Park Authority;
- Arun District Council;
- Waverley Borough Council;
- West Sussex Joint Minerals Plan;
- West Sussex Waste Local Plan;
- West Sussex Transport Plan 2011 – 26;
- SES Water – Revised Draft Water Resources Management Plan 2019;
- Southern Water – Water Resource Management Plan 2020;
- South East Water – Water Resources Management Plan 2020 to 2080;
- Thames River Basin Management Plan; and
- Gatwick Airport Northern Runway.

3.6 Case law

3.6.1 The European Court Judgement on the interpretation of the Habitats Directive in the case of People Over Wind and Sweetman vs Colitte Teoranta (Case C-323/17[30]) determined that mitigation measures are only permitted to be considered as part of an appropriate assessment (**Box 1**).

Box 1: The Sweetman Case (April 2018)

A recent decision by the Court of Justice of the European Union (CJEU) People Over Wind and Sweetman v Coillte Teoranta (C-323/17) (from here on known as the 'Sweetman Case') has important consequences for the HRA process in the UK.

In summary, the ruling reinforces the position that if an LSE is identified during the HRA screening process it is not appropriate to incorporate mitigation measures to prevent the LSE at this stage. An appropriate assessment (AA) of the potential effects and the possible avoidance or mitigation measures must be undertaken. The 're-screening the Plan after mitigation has been applied' is no longer an option which would be legally compliant:

"Article 6(3) of Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora must be interpreted as meaning that, in order to determine whether it is necessary to carry out, subsequently, an appropriate assessment of the implications, for a site concerned, of a plan or project, it is not appropriate, at the screening stage, to take account of the measures intended to avoid or reduce the harmful effects of the plan or project on that site."

3.6.2 In light of the above, it is necessary to further define mitigation measures. The DTA Handbook notes that there are two types of measures as follows:

- *"Measures intended to avoid or reduce harmful effects on a European site; or*
- *Features or characteristics of a plan which are essential in defining the nature, scale, location, timing, frequency or duration of the plan's proposals, or they may be inseparable aspects of the plan, without which an assessment of the plan could not properly be made, in the screening decision, even though these features or*

[30] InfoCuria (2018) Case C-323/17. Available at: http://curia.europa.eu/juris/document/document.jsf?docid=200970&doclang=EN [Date Accessed: 27/01/20]

characteristics may incidentally have the effect of avoiding or reducing some or all of the potentially adverse effects of a plan".

3.6.3 The HRA screening process undertaken for the Local Plan has not taken account of incorporated mitigation or avoidance measures that are intended to avoid or reduce harmful effects on a European site when assessing the LSE of the Local Plan on European sites. These are measures, which if removed (i.e. should they no longer be required for the benefit of a European site), would still allow the lawful and practical implementation of a plan.

3.6.4 Traffic and roads present a cross boundary issue. On 20th March 2017 a high court ruling[31] found that traffic increases and subsequent air pollution on roads within 200m of a European site also requires an in-combination approach that considers the development of neighbouring and nearby authorities (**Box 2**).

Box 2: The Wealden Case (March 2017)

On 20th March 2017 a high court ruling found that traffic increases and subsequent air pollution on roads within 200m of an EU site also requires an in-combination approach that considers the development of neighbouring and nearby authorities. This is because projects and plans that increase road traffic flow have a high likelihood of acting together, or 'in-combination', with other plans or projects that would also increase traffic on the same roads. If the combined effects of borough's development will lead to increases of traffic of more than 1,000 cars a day, further consideration of the issue is required. This would be through traffic and air quality modelling.

It is therefore necessary to consider the potential impact of the Local Plan on roads within 200m of each EU site both alone and in-combination with relevant plans and projects.

3.6.5 Consideration has therefore been given to impacts of the Local Plan both alone and in-combination with other plans and projects. This approach is compliant with the Wealden Judgement.

3.7 Stage 2: Appropriate Assessment and Integrity Test

3.7.1 Stage 2 of the HRA process comprises the appropriate assessment and integrity test. The purpose of the appropriate assessment (as defined by the DTA Handbook) is to "*undertake an objective, scientific assessment of the implications for the European site qualifying features potentially affected by the plan in light of their consideration objectives and other information for assessment*".

3.7.2 As part of this process decision makers should take account of the potential consequences of no action, the uncertainties inherent in scientific evaluation and should consult interested parties on the possible ways of managing the risk, for instance, through the adoption of mitigation measures. Mitigation measures should aim to avoid, minimise or reduce significant effects on European sites. Mitigation measures may take the form of policies within the Local Plan or mitigation proposed through other plans or regulatory mechanisms. All mitigation measures must be deliverable and able to mitigate adverse effects for which they are targeted.

3.7.3 The appropriate assessment aims to present information in respect of all aspects of the Local Plan and ways in which it could, either alone or in-combination with other plans and projects, affect a European site.

[31] Wealden District Council & Lewes District Council before Mr Justice Jay. Available at: http://www.bailii.org/ew/cases/EWHC/Admin/2017/351.html [Date Accessed: 27/01/20]

3.7.4 The plan-making body (as the Competent Authority) must then ascertain, based on the findings of the appropriate assessment, whether the Local Plan will adversely affect the integrity of a European site either alone or in-combination with other plans and projects. This is referred to as the Integrity Test.

3.8 Dealing with uncertainty

3.8.1 Uncertainty is an inherent characteristic of HRA, and decisions can be made only on currently available and relevant information. This concept is reinforced in the 7th September 2004 'Waddenzee' ruling[32]:

3.8.2 *"However, the necessary certainty cannot be construed as meaning absolute certainty since that is almost impossible to attain. Instead it is clear from the second sentence of Article 6(3) of the habitats directive that the competent authorities must take a decision having assessed all the relevant information which is set out in particular in the appropriate assessment. The conclusion of this assessment is, of necessity, subjective in nature. Therefore, the competent authorities can, from their point of view, be certain that there will be no adverse effects even though, from an objective point of view, there is no absolute certainty".*

3.9 The Precautionary Principle

3.9.1 The HRA process is characterised by the precautionary principle. This is described by the European Commission as being:

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

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[32]EC Case C-127/02 Reference for a Preliminary Ruling 'Waddenzee' 7th September 2004 Advocate General's Opinion (para 107)

4 Scope of the HRA

4.1 Background

4.1.1 As noted above, the HRA has been an iterative process undertaken alongside the development of the Local Plan. The outputs of this assessment have informed the plan-making process.

4.1.2 The screening stage identifies Likely Significant Effects (LSEs) of the Local Plan upon European sites, either alone or in combination with other plans or projects. This section considers the potential 'significance' of adverse effects. Where elements of the plan will not result in an LSE on a European site these have been screened out and not considered in further detail in the HRA process.

4.2 European sites

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

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

4.3 Identification of European sites

4.3.1 There is no guidance that defines the study area for inclusion in HRA. Planning Practice Guidance for Appropriate Assessment (listed above) indicates that:

4.3.2 "*The scope and content of an appropriate assessment will depend on the nature, location, duration and scale of the proposed plan or project and the interest features of the relevant site. 'Appropriate' is not a technical term. It indicates that an assessment needs to be proportionate and sufficient to support the task of the competent authority in determining whether the plan or project will adversely affect the integrity of the site*".

4.3.3 Therefore, in order to determine a study area for the HRA, consideration has been given to the nature and extent of potential impact pathways from the Local Plan and their relationship to European sites.

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4.3.4 The 2019 and 2020 HRA reports on the previous Local Plan (see **Table 2.1**) considered the scope of the HRA using a 'source-pathway-receptor' model. The European sites to be assessed in this HRA report, taking into consideration impact pathways and previous HRA work undertaken, representations received on the HRA from Natural England (see **Table 2.2**) and further consultation with Natural England include the following:

- Ashdown Forest SAC;
- Ashdown Forest SPA;
- Mole Gap to Reigate Escarpment SAC;
- South West London Waterbodies SPA;
- South West London Waterbodies Ramsar;
- Arun Valley SPA;
- Arun Valley SAC;
- Arun Valley Ramsar; and
- The Mens SAC.

4.3.5 The HRA provides an assessment of adverse effects associated with the Local Plan (both alone and in-combination) on the European sites listed above, as illustrated in **Figure 4.1**.

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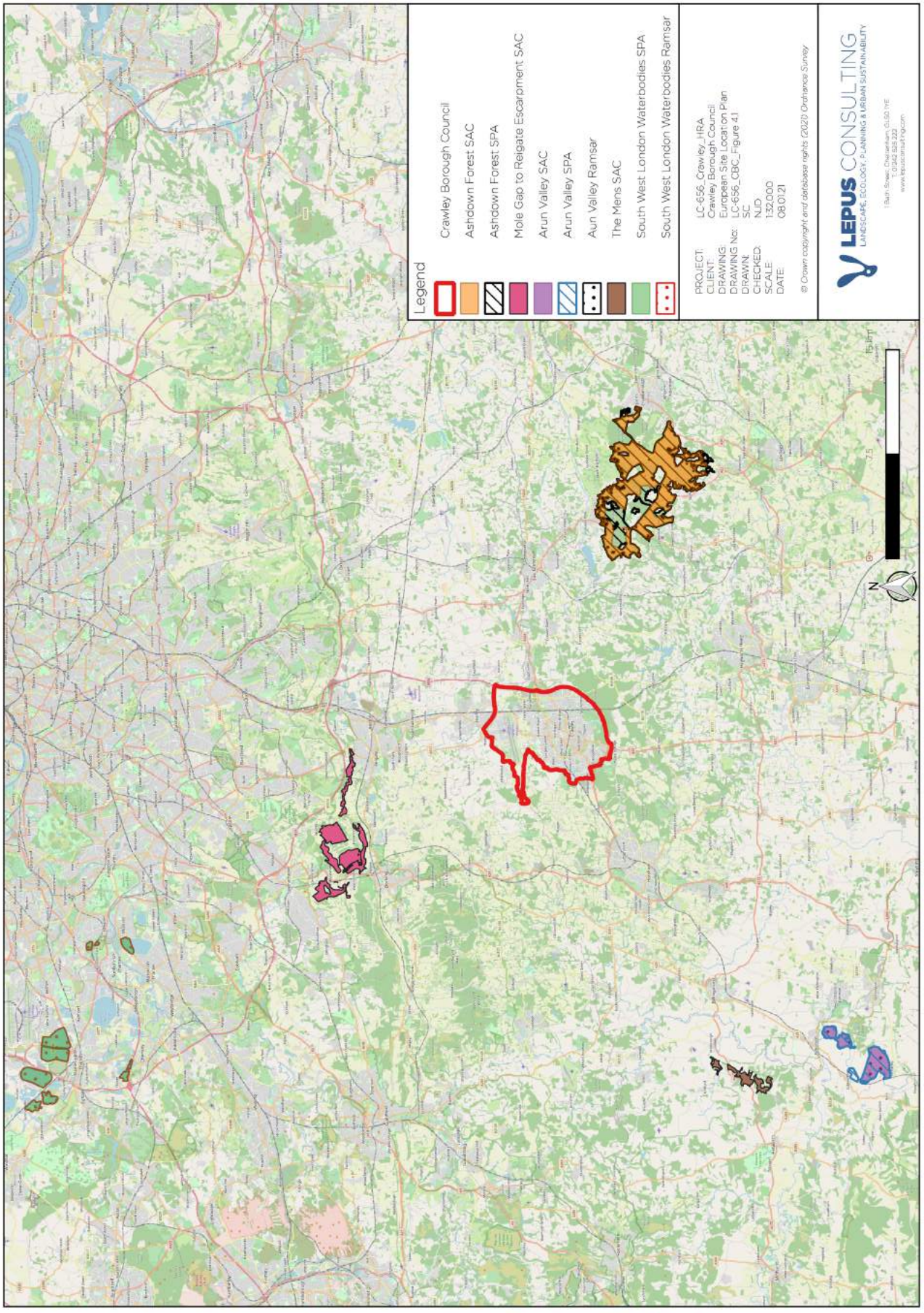

Figure 4.1: *European sites within HRA study area*

4.3.6 The CJEU ruling in the Holohan case (C-461/17[33]) confirmed that appropriate assessment should: (i) catalogue (i.e. list) all habitats and species for which the site is protected and (ii) include in its assessment other (i.e. non-protected) habitat types or species which are on the site and habitats and species located outside of the site if they are necessary to the conservation of the habitat types and species listed for the protected area (**Box 3**).

Box 3: Holohan v An Bord Pleanala (November 2018)

"Article 6(3) of Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora must be interpreted as meaning that an 'appropriate assessment' must, on the one hand, catalogue the entirety of habitat types and species for which a site is protected, and, on the other, identify and examine both the implications of the proposed project for the species present on that site, and for which that site has not been listed, and the implications for habitat types and species to be found outside the boundaries of that site, provided that those implications are liable to affect the conservation objectives of the site.

Article 6(3) of Directive 92/43 must be interpreted as meaning that the competent authority is permitted to grant to a plan or project consent which leaves the developer free to determine subsequently certain parameters relating to the construction phase, such as the location of the construction compound and haul routes, only if that authority is certain that the development consent granted establishes conditions that are strict enough to guarantee that those parameters will not adversely affect the integrity of the site.

Article 6(3) of Directive 92/43 must be interpreted as meaning that, where the competent authority rejects the findings in a scientific expert opinion recommending that additional information be obtained, the 'appropriate assessment' must include an explicit and detailed statement of reasons capable of dispelling all reasonable scientific doubt concerning the effects of the work envisaged on the site concerned".

4.3.7 The HRA fully considers the potential for effects on species and habitats. This includes those not listed as a qualifying feature for the European site, but which may be important to achieving its conservation objectives. This ensures that the functional relationships underlying European sites and the achievement of their conservation objectives are adequately understood.

4.3.8 **Appendix A** identifies the qualifying features of each of these sites and presents details of their conservation objectives. This information is drawn from the Joint Nature Conservancy Council (JNCC) and Natural England.

4.3.9 SSSIs are protected areas in the United Kingdom designated for conservation. SSSIs are the building blocks of site-based nature conservation in the UK. A SSSI will be designated based on the characteristics of its fauna, flora, geology and/or geomorphology. Whilst typically analogous in ecological function, the reasons for its designation can be entirely different to those for which the same area is designated as a European site.

4.3.10 Natural England periodically assesses the conservation conditions of each SSSI unit, assigning it a status. SSSIs located either entirely or partially within the European sites considered in this report are listed in **Appendix B** along with their current conservation status. The conservation status of each SSSI highlights any SAC/SPA that is currently particularly vulnerable to threats/pressures. Conservation status is defined as follows:

- Favourable;
- Unfavourable – recovering;
- Unfavourable – no change; or
- Unfavourable – declining.

[33] EUR-Lex (2018) Case C-461/17. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:62017CJ0461&from=EN [Date Accessed: 27/01/20]

4.3.11 SSSI units in either an 'Unfavourable – no change' or 'Unfavourable – declining' condition indicate that the European site may be particularly vulnerable to certain threats or pressures. It is important to remember that the SSSI may be in an unfavourable state due to the condition of features unrelated to its European designation. However, it is considered that the conservation status of SSSI units that overlap with European sites offer a useful indicator of habitat health at that location.

4.3.12 Natural England defines zones around each SSSI which may be at risk from specific types of development, these are known as Impact Risk Zones (IRZ). These IRZs are *"a GIS tool developed by Natural England to make a rapid initial assessment of the potential risks to SSSIs posed by development proposals. They define zones around each SSSI which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts. The IRZs also cover the interest features and sensitivities of European sites, which are underpinned by the SSSI designation and "Compensation Sites", which have been secured as compensation for impacts on Natura 2000/Ramsar sites"*[34]. The location of IRZs has been taken into consideration in this assessment as they provide a useful guide as to the location of functionally linked land and likely vulnerabilities to development proposed within the Local Plan.

4.4 Threats and pressures

4.4.1 Threats and pressures to which each European site is vulnerable have been identified through reference to data held by the JNCC on Natura 2000 Data Forms, Ramsar Information Sheets and Site Improvement Plans (SIPs). This information provides current and predicted issues at each European site. The full range of threats and pressures at each European site identified is provided at **Appendix C**.

4.4.2 Supplementary advice notices prepared by Natural England provide more recent information on threats and pressures upon European sites than SIPs. Additional threats flagged up by supplementary advice notices have also been screened.

4.4.3 A number of similar threats and pressures have been considered together, for instance 'water pollution', 'water abstraction for Public Water Supply' and 'inappropriate water levels' is considered under 'hydrological change'. Furthermore, a number of threats and pressures are considered to be beyond the scope of the potential impacts of the Local Plan. The following threats and pressures are, therefore, not considered further in this assessment:

- Change in land management;
- Diseases;
- Inappropriate scrub control;
- Changes in species distributions;
- Invasive species;
- Natural changes to site conditions;
- Fisheries;
- Inappropriate weed control; and
- Inappropriate ditch management.

[34] Natural England (2019) Natural England's Impact Risk Zones for Sites of Special Scientific Interest User Guidance. Available at: https://magic.defra.gov.uk/Metadata_for_magic/SSSI%20IRZ%20User%20Guidance%20MAGIC.pdf [Date Accessed: 27/01/20]

4.4.4 Following a review of HRA assessment work undertaken to date for the previous Local Plan and an identification of causal connections and links, the remaining threats and pressures that were considered to be within the scope of influence of the Local Plan are summarised in **Table 4.1** and include:

- Air pollution;
- Habitat loss and fragmentation (to include offsite habitat availability/management and loss of habitat connectivity);
- Hydrological changes (to include water abstraction and water pollution); and
- Public access and disturbance (to include impacts of development and recreational impacts).

4.4.5 **Table 4.1** below provides a summary of all identified threats and pressures for each European site identified through professional judgement and site-specific knowledge and through a review of SIPs, Natural England's supplementary advice and consultation with Natural England. **Appendix C** presents the list of qualifying features of each European site identified within the relevant SIP as being vulnerable to each of the threats and pressures.

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Table 4.1: *Pressures and threats for Qualifying Features of European sites that may potentially be affected by the Local Plan*

		European sites				
		Ashdown Forest SPA and SAC[35]	Mole Gap to Reigate Escarpment SAC[36]	South West London Waterbodies SPA[37] and Ramsar[38]	Arun Valley SCI and SPA[39] and Ramsar[40]	The Mens[41]
Threats	Air pollution	H4010 Wet heathland with cross-leaved heath H4030 European dry heaths	H4030 European dry heaths, H5110 Natural box scrub, H6210 Dry grasslands and scrublands on chalk or limestone (important orchid sites), H9130 Beech forests on neutral to rich soils, H91J0 Yew-dominated woodland, S1323 Bechstein`s bat	A051. *Anas strepera* Gadwall (Non-breeding) A056. *Anas clypeata* Northern Shoveler (Non-breeding)[42]		H9120 Beech forests on acid soils, S1308 Barbastelle bat

[35] Natural England. 2014. Site Improvement Plan. Ashdown Forest SPA and SAC. http://publications.naturalengland.org.uk/file/6679502935556096. [Date Accessed: 14/09/20].

[36] Natural England. 2014. Site Improvement Plan. Mole Gap to Reigate Escarpment SAC. http://publications.naturalengland.org.uk/file/6256378880458752 [Date Accessed: 14/09/20].

[37] Natural England. 2014. Site Improvement Plan. South West London Waterbodies SPA. http://publications.naturalengland.org.uk/file/5135484288237568 [Date Accessed: 14/09/20].

[38] JNCC. 2008. Information Sheet on Ramsar Wetlands. South West London Waterbodies Ramsar. https://jncc.gov.uk/jncc-assets/RIS/UK11065.pdf Date Accessed: 14/09/20].

[39] Natural England. 2014. Site Improvement Plan. Arun Valley SCI and SPA. http://publications.naturalengland.org.uk/file/5185212862431232. [Date Accessed: 14/09/20].

[40] JNCC. 2008. Information Sheet on Ramsar Wetlands. Arun Ramsar. https://jncc.gov.uk/jncc-assets/RIS/UK11005.pdf Date Accessed: 14/09/20].

[41] Natural England. 2014. Site Improvement Plan. The Mens SAC. http://publications.naturalengland.org.uk/publication/5548316158853120 [Date Accessed: 08/12/20].

[42] Natural England. 2018. Supplementary Advice on Conserving and Restoring Site Features. South West London Waterbodies SPA. http://publications.naturalengland.org.uk/file/5893345162821632 [Date Accessed: 14/09/20].

	Habitat loss and fragmentation		S1166 Great crested newt, S1323 Bechstein`s bat			S1308 Barbastelle bat
	Public access / disturbance	A224(B) European nightjar A302(B) Dartford Warbler	H6210 Dry grasslands and scrublands on chalk or limestone (important orchid sites) S1166 Great crested newt, S1323 Bechstein`s bat	A051(NB) Gadwall, A056(NB) Shoveler		S1308 Barbastelle bat
	Hydrological changes (to include water supply and water quality)	H4010 Wet heathland with cross-leaved heath	H4030. European dry heaths S1166. *Triturus cristatus*; Great crested newt[43]	A051. *Anas strepera* Gadwall (Non-breeding) A056. *Anas clypeata* Northern Shoveler (Non-breeding)[44]	A037(NB) Bewick's Swan, S4056 Little ramshorn whirlpool snail, Waterbird assemblage Red Data Book invertebrate and plant species Waterfowl Northern pintail, *Anas acuta*	

[43] Natural England. 2019. Supplementary Advice on Conserving and Restoring Site Features. Mole Gap to Reigate Escarpment SAC. http://publications.naturalengland.org.uk/file/6354450398838784 [Date Accessed: 14/09/20].

[44] Natural England. 2018. Supplementary Advice on Conserving and Restoring Site Features. South West London Waterbodies SPA. http://publications.naturalengland.org.uk/file/5893345162821632 [Date Accessed: 14/09/20].

4.5 Air quality

4.5.1 Air pollution can affect European sites if it has an adverse effect on its features of qualifying interest. The main mechanisms through which air pollution can have an adverse effect is through eutrophication (nitrogen), acidification (nitrogen and sulphur) and direct toxicity (ozone, ammonia and nitrogen oxides)[45]. Deposition of air pollutants can alter the soil and plant composition and species which depend upon these.

4.5.2 As noted in **Table 4.1** air pollution, and in particular atmospheric nitrogen deposition, has been identified as a threat or pressure for qualifying features of the following European sites within the relevant SIPs:

- Ashdown Forest SAC;
- Mole Gap to Reigate Escarpment SAC; and
- The Mens SAC.

4.5.3 In addition, a review of supplementary advice on conserving and restoring site features prepared by Natural England indicates that features within the South West London Waterbodies SPA and Ramsar designations are also sensitive to changes in air quality:

4.5.4 Excess atmospheric nitrogen deposition within an ecosystem or habitat can disrupt the delicate balance of ecological processes interacting with one another. As the availability of nitrogen increases in the local environment, some plants that are characteristic of that ecosystem may become competitively excluded in favour of more nitrophilic plants. It also upsets the ammonium and nitrate balance of the ecosystem, which disrupts the growth, structure and resilience of some plant species.

4.5.5 Excess nitrogen deposition often leads to the acidification of soils and a reduction in the soils' buffering capacity (the ability of soil to resist pH changes). It can also render the ecosystem more susceptible to adverse effects of secondary stresses, such as frost or drought, and disturbance events, such as foraging by herbivores.

4.5.6 As an attempt to manage the negative consequences of atmospheric nitrogen deposition, 'critical loads' have been established for ecosystems in Europe. Each European site is host to a variety of habitats and species, the features of which are often designated a critical load for nitrogen deposition. The critical loads of pollutants are defined as a:

4.5.7 "*…quantitative estimate of exposure to one or more pollutants below which significant harmful effects on specified sensitive elements of the environment do not occur according to present knowledge*"[46].

[45] APIS (2016) Ecosystem Services and air pollution impacts. Available at: http://www.apis.ac.uk/ecosystem-services-and-air-pollution-impacts. [Date Accessed: 28/01/20]

[46] UNECE (date unavailable) ICP Modeling and Mapping Critical loads and levels approach. Available at: http://www.unece.org/env/lrtap/WorkingGroups/wge/definitions.html [Date Accessed: 28/01/20]

4.5.8 Natural England's advice on the assessment of air quality impacts under the Habitats Regulations states that consideration should be given to the risk of road traffic emissions associated with a Local Plan[47]. This advice states that an assessment of the risks from road traffic emissions can be expressed in terms of the average annual daily traffic flow (AADT as a proxy for emissions). The use of the AADT screening threshold is advocated by Highways England in their Design Manual for Roads and Bridges (DMRB). This screening threshold is intended to be used as a guide to determine whether a more detailed assessment of the impact of emissions from road traffic is required. This non-statutory or guideline threshold is based on a predicted change of daily traffic flows of 1,000 AADT or more (or heavy-duty vehicle flows on motorways (HDV) change by 200 AADT or more).

4.5.9 The AADT thresholds do not themselves imply any intrinsic environmental effects and are used solely as a trigger for further investigation. Widely accepted environmental benchmarks for imperceptible impacts are set at 1% of the critical load or level, which is considered to be roughly equivalent to DMRB thresholds for changes in traffic flow of 1,000 AADT and for HDV of 200 AADT. This has been confirmed by modelling using the DMRB Screening Tool that used average traffic flow and speed figures from the Department for Transport (DfT) data to calculate whether the NO_x outputs could result in a change of >1% of critical load / level on different road types. A change of >1,000 AADT on a road was found to equate to a change in traffic flow which might increase emissions by 1% of the Critical Load or Level and might consequentially result in an environmental effect nearby (e.g. within 10 metres of roadside).

4.5.10 The AADT thresholds and 1% of critical load/level are considered by Natural England to be suitably precautionary as any emissions below this level are widely considered to be imperceptible and, in the case of AADT, undetectable through the DMRB model. There can, therefore, be a high degree of confidence in its application to screen for risks of an effect.

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[47] Natural England (2018) Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (NEA001). Available at: http://publications.naturalengland.org.uk/publication/4720542048845824 [Date Accessed: 28/01/20]

4.5.11 It is widely accepted that the effects of air pollutants from road transport decrease with distance from the source of pollution i.e. the road carriageway[48,49,50]. The DfT in their Transport Analysis Guidance (TAG) consider that, "*beyond 200m from the link centre, the contribution of vehicle emissions to local pollution levels is not significant*"[51]. This is illustrated in **Figure 4.2**. This statement is supported by Highways England and Natural England based on evidence presented in a number of research papers[52,53]. However, it is also noted that effects can, in some circumstances, occur beyond 200m.

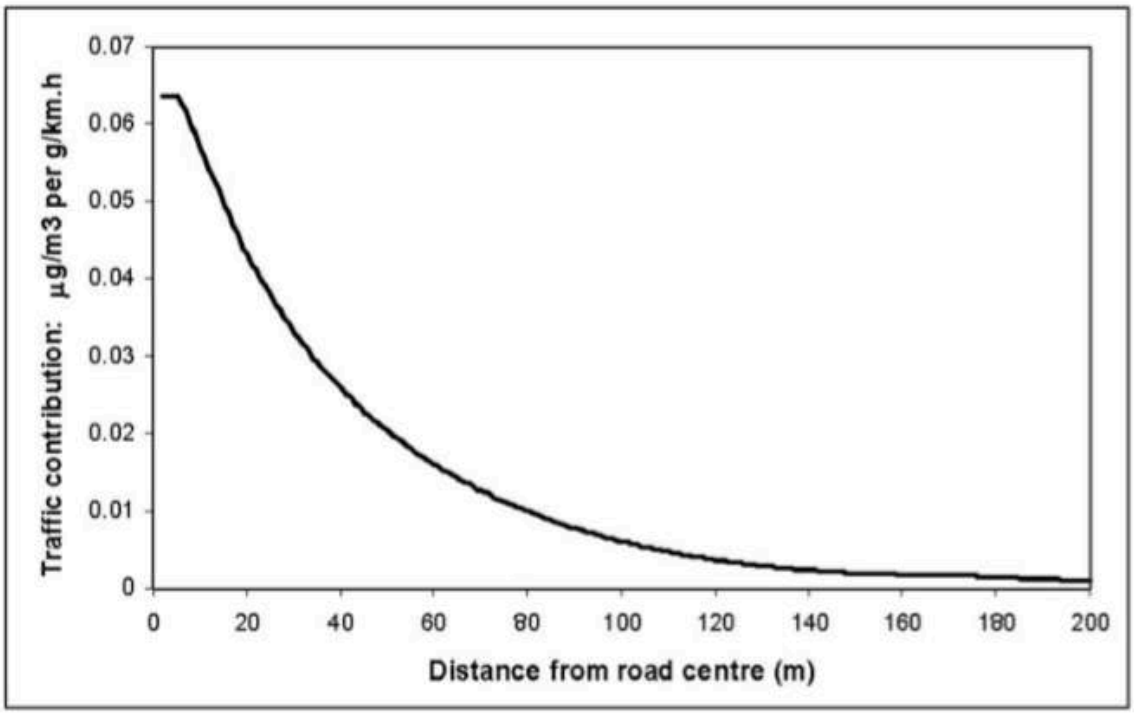

Figure 4.2: Traffic contribution to pollution concentration at different distances from road centre

4.5.12 Advice from Natural England[54] states that a four-step process for screening if there will be an LSE from air pollution should be adopted as follows:

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

[49] Natural England (2016) The ecological effects of air pollution from road transport: an updated review. Natural England Commissioned Report NECR 199.

[50] Bignal, K., Ashmore, M. & Power, S. (2004) The ecological effects of diffuse air pollution from road transport. English Nature Research Report No. 580, Peterborough.

[51] Department for Transport (2015) TAG UNIT A3 Environmental Impact Appraisal. Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/487684/TAG_unit_a3_envir_imp_app_dec_15.pdf' [Date Accessed: 14/09/20]

[52] Bignal, K., Ashmore, M & Power, S. (2004) The ecological effects of diffuse air pollution from road transport. English Nature Research Report No. 580, Peterborough.

[53] Ricardo-AEA (2016) The ecological effects of air pollution from road transport: an updated review. Natural England Commissioned Report No. 199.

[54] Natural England (2018). Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations. Version June 2018.

- **Step 1:** Does the proposal give rise to emissions which are likely to reach a European site? As noted above, distance-based criteria have been established by Natural England and Highways England to determine the likely impact of air pollution from a road source on a European site. This distance was taken as 200m for the purposes of this assessment. For the purpose of this screening assessment it has been assumed that roads forming part of the strategic road network (motorways, 'A' roads and 'B' roads) are likely to experience the most significant increases in vehicle traffic as a result of development (i.e. greater than 1,000 AADT). These links were extracted from the transport model where available. Where a proposal is considered to have an LSE because it breaches the screening threshold either alone or in-combination on these strategic links there may be a requirement to look at contributions from more minor road links at appropriate assessment stage.
- **Step 2:** Are the qualifying features of sites within 200m of a road sensitive to air pollution? The sensitivity of qualifying features has been determined following a review of broad category and site relevant information which in some cases required site surveys.
- **Step 3:** Could the sensitive qualifying features of the site be exposed to emissions?
- **Step 4:** Application of screening thresholds:
    - **Step 4a:** Apply the thresholds alone. Where a proposal is considered to have an LSE because it breaches the screening threshold alone it should go through to an appropriate assessment 'alone'. There is no need to consider the potential for in-combination effects at the screening step as an appropriate assessment is needed in any event. If the predicted change in traffic flow is less than 1,000 AADT (or the level of emissions is <1% of the critical load/level), the associated emissions are not likely to have a significant effect alone, but the risk of in-combination effects should be considered further.
    - **Step 4b:** Apply the threshold in-combination with emissions from other road traffic plans and projects. Where a proposal is below the screening threshold 'alone' (step 4a), step 4b must be considered to apply the same screening threshold 'in-combination'.
    - **Step 4c:** Apply the threshold in-combination with emissions from other non-road plans and projects. Consider non-road plans and projects to recognise in-combination effects from other pollution sources.

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4.5.13 Consideration of the screening thresholds set out above must be applied for both the Local Plan alone and in-combination with other plans and projects. This is because any increase in traffic flows may lead to in-combination effects on the European sites. Vehicle movements generated by different plans and projects are likely to increase the traffic on the same roads. This approach is compliant with the Wealden Judgement which determined that traffic and roads are a cross boundary issue (see **Box 2**). The high court ruling on 20 March 2017[55] found that traffic increases and subsequent air pollution on roads within 200m of a European site also requires an in-combination approach that considers the development of neighbouring and nearby authorities. If the combined effects of borough's development will lead to increases of traffic of more than 1,000 AADT or if air quality modelling data indicates that there is going to be an increase in deposition loads of more than 1% on background levels; an LSE is anticipated.

4.5.14 Data obtained from the Office for National Statistics highlights the most common destinations for journeys to work undertaken by car or van arising from Crawley and those finishing in Crawley[56] (**Figure 4.3**). It is noted that these figures do not include journeys to work that both start and end in Crawley.

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[55] Wealden District Council & Lewes District Council before Mr Justice Jay. Available at: http://www.bailii.org/ew/cases/EWHC/Admin/2017/351.html [Date Accessed: 14/09/20]

[56] Office for National Statistics (2011) Location of usual residence and place of work by method of travel to work (2011 census data). Available at: https://www.nomisweb.co.uk/census/2011/wu03uk/chart and https://www.nomisweb.co.uk/census/2011/wu03uk [Date Accessed: 14/09/20]

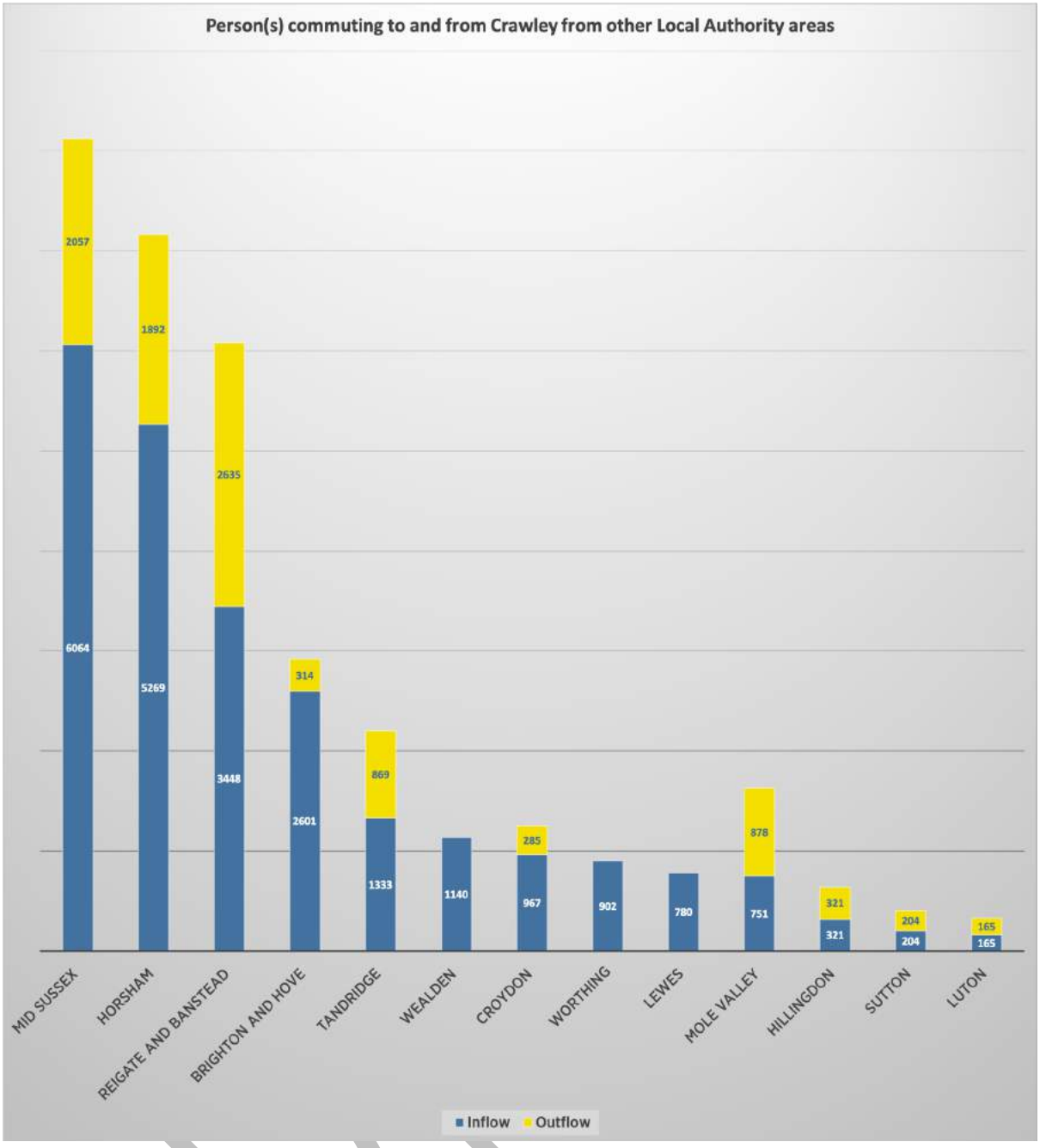

Figure 4.3: *Inflow and outflow traffic data for Crawley – journeys by car and van only*

4.5.15 Traffic modelling was commissioned to support the Local Plan. This data was analysed in the context of Natural England's screening methods and, where required, further, more detailed, assessment has been undertaken.

4.6 Hydrology

4.6.1 Potential hydrological effects of urbanisation within European sites can be associated with an alteration in water balance and reduced water quality.

4.6.2 Urban development can reduce catchment permeability and the presence of drainage networks may be expected to remove runoff from urbanised catchments. This may result in changes in run off rates from urbanised areas to European sites or watercourses which run through them. Water mains leakage, sewer infiltration and abstraction for water supply to meet demand may also affect the water balance.

4.6.3 In addition, urbanisation has the potential to reduce the quality of water entering a catchment during the construction of a development through processes such as sedimentation, accidental spillage of chemicals and materials. Water quality may also be reduced through effluent discharges and pollution as well as an increased water temperature.

4.6.4 Features for which a European site is designated are often sensitive to changes in water balances and water quality. Therefore, urbanisation affecting drainage streams which flow through, or groundwater sources which feed a European site has the potential to adversely affect the features for which it is designated.

4.6.5 The Plan area lies within the Thames river basin and within the River Mole management catchment. The River Mole, a tributary of the River Thames, flows along the western boundary of the Plan area with a number of smaller watercourses throughout the Plan area, such as Gatwick Stream and Crawter's Brook, feeding into it.

4.6.6 Southern Water, SES Water and South East Water provide water supply for the Plan area. Wastewater treatment is provided by Crawley Wastewater Treatment Works (WwTW) which discharges to the River Mole. It is understood that some flow may also be pumped to Horley WwTW which also discharges to the River Mole.

Water Cycle Study

4.6.7 As part of the evidence base to support the Local Plan a Gatwick Sub Regional Water Cycle Study (WCS)[57] was commissioned by Crawley Borough Council, acting on behalf of the councils in the Gatwick Sub-Region (Crawley Borough Council, Horsham District Council, Mid Sussex District Council and Reigate and Banstead Council).

4.6.8 The purpose of the WCS was to assess the potential issues relating to future development within the Gatwick Sub-Region and the impacts on water supply, wastewater collection and wastewater treatment. The WCS also provided an assessment on the impact of development proposed in the Local Plan on the aquatic environment and the quality and quantity of water at European sites.

4.6.9 The WCS was undertaken through consultation with the Gatwick Sub-Region Authorities, water and wastewater utilities, the Environment Agency, Natural England, and where there were cross-boundary issues, with neighbouring local authorities

4.6.10 The WCS analysed a number of key potential hydrological impacts at European sites as follows:

- Point sources of pollution – e.g. from WwTWs;

[57] JBA Consulting (August 2020). Gatwick Sub-Region Water Cycle Study. Final Report.

- Diffuse sources of pollution – e.g. run off from roads and development sites (during construction and operation), mis connected and non-mains sewers and septic tanks; and
- Change in water quantity due to increased water demand.

4.6.11 The outputs of the WCS are discussed in more detail in the screening and appropriate assessment sections of this HRA.

Water Resource Planning

4.6.12 It is a statutory requirement that every five years water companies produce and publish a Water Resources Management Plan (WRMP). The WRMP demonstrates long term plans to accommodate the impacts of population growth, drought, environmental obligations and climate change uncertainty in order to balance supply and demand.

4.6.13 Three water companies supply water in the Gatwick Sub-Region and include.

- SES Water serves Reigate and Banstead and the northern portion of Crawley, notably including Gatwick Airport.
- Southern Water serves Horsham and the majority of Crawley.
- South East Water serves Mid Sussex and the south eastern edge of Crawley.

4.6.14 Water companies divide their supply into Water Resource Zones (WRZs). Crawley north lies within the SES Water East Surrey WRZ, with Crawley lying with the Southern Water Sussex North WRZ and South East Crawley within the South East Water Haywards Heath WRZ. All three WRZs in the study area are classed as being under serious water stress with a number of deficits identified over the plan period.

4.6.15 The WCS undertook a review of the relevant WRMPs alongside estimates of future housing growth in the local area to determine whether resources are projected to be in surplus or deficit at any point over the period of the Local Plan (a review of these documents and associated HRAs is provided in **Appendix D**).

- SES Water – Revised Draft Water Resources Management Plan 2019[58];
- Southern Water – Water Resource Management Plan 2020[59]; and
- South East Water – Water Resources Management Plan 2020 to 2080[60].

4.6.16 The Environment Agency operates a Catchment Abstraction Management Strategy (CAMS) under which it manages an Abstraction Licensing Strategy (ALS) for each sub-catchment within a river basin. The purpose of ALS is to manage water resources across England and to comply with the requirements of the Water Framework Directive (WFD). This ensures that flows are balanced on the basis of set thresholds and minimum flow levels to protect the environment and manage the balance between water supply and water demand. This is key for water resource management planning.

[58] SES Water. April 2019. Revised Draft Water Resources Management Plan 2019 – Main Report.

[59] Southern Water. Water Resource Management Plan 2020: Technical Overview

[60] South East Water. Water Resources Management Plan 2020 to 2080

4.6.17 Crawley Borough Council is located with the River Mole CAMS area. The WCS notes that groundwater abstraction accounts for 72% all licenced abstractions in this catchment, with the majority of these coming from a chalk aquifer. It goes on to note that consumptive groundwater licences which do not have a direct impact upon main river flows may be permitted but may be subject to restrictions such as prescribed groundwater levels. Restrictions will be determined on a case-by-case basis, dependent upon the nature and scale of any abstraction.

4.6.18 The Arun and Western Streams ALS covers the south western boundary of the Plan area, encompassing the River Arun, Western Rother and the West Sussex coastal plains. The WCS notes that there is water available in two of the groundwater abstraction areas and restricted water available in the remaining three, meaning no new consumptive licences will be granted.

4.6.19 Consultation with Natural England (see **Table 4.2** above) has indicated that there are specific water resource concerns associated with Southern Water's abstraction at Hardham and its impact on the Arun Valley SPA/SAC/Ramsar.

River Basin Management Planning

4.6.20 The Plan area lies within the Thames River Basin Management Plan (RBMP)[61] area. The WFD provides an indication of the health of the water environment and whether a water body is at good status or potential. This is determined through an assessment of a range of elements relating to the biology and chemical quality of surface waters and quantitative and chemical quality of groundwater. To achieve good ecological status or potential, good chemical status or good groundwater status every single element assessed must be at good status or better. If one element is below its threshold for good status, then the whole water body's status is classed below good. Surface water bodies can be classed as high, good, moderate, poor or bad status.

4.6.21 The WFD sets out areas which require special protection. These include areas designated for "*the protection of habitats or species where the maintenance or improvement of the status of water is an important factor in their protection including relevant Natura 2000 sites designated under Directive 92/43/EEC (the Habitats Directive) and Directive 79/409/EEC (the Birds Directive)*"[62].

4.6.22 A review of Thames RBMP indicated that in 2015 the Thames Basin District Area, which comprises 498 waterbodies, contained only 27 surface waterbodies which were classified as being of bad ecological status and 5 failing chemical status testing.

[61] Defra and Environment Agency. December 2016. Thames River Basin District – River Basin Management Plan.

[62] Official Journal of the European Communities (2000) Directive 2000/60/EC of the European Parliament and of the Council of 23 October 2000 establishing a framework for Community action in the field of water policy. Available at: https://eur-lex.europa.eu/resource.html?uri=cellar:5c835afb-2ec6-4577-bdf8-756d3d694eeb.0004.02/DOC_1&format=PDF [Date Accessed: 28/01/20]

4.6.23 The Thames RBMP provides a framework for protecting and enhancing the benefits provided by the water environment. To achieve this, and because water and land resources are closely linked, it also informs decisions on land-use planning. It provides strategic level policy guidance in relation to baseline classification of water bodies, statutory objectives for protected areas and water bodies and a summary of measures to achieve statutory protection. Out of a total of 47 groundwater bodies 22 had a quantitative poor status and 18 a poor chemical status.

4.6.24 The RBMP sets out a number of ongoing measures that help prevent deterioration and protect the many uses of the water environment. These include:

- Physical modifications;
- Managing pollution from wastewater;
- Managing pollution from towns, cities and transport;
- Changes to natural flow and levels of water;
- Managing invasive non-native species; and
- Manage pollution from rural areas.

4.6.25 An HRA was prepared alongside the development of the Thames RBMP[63]. This HRA identified potential hazards associated with implementation of measures set out within in the RBMP. These hazards were noted to be associated with the types of measures that are related to each significant water management issue. The level of detail of the RBMP did not allow detailed consideration of effects on individual European sites. However, at the strategic level of the RBMP, the assessment undertaken allowed confidence that the measures could go ahead without harm to European sites, subject to more detailed scrutiny of mitigation options at the lower tier plan or project level through adoption of project level HRA. It therefore concluded that, at the strategic plan level, when taking into consideration the range of potential mitigation options available, the RBMP is not likely to have any significant effects on any European sites, alone or in combination with other plans or projects.

4.7 Habitat fragmentation and loss

4.7.1 There are no European sites located within the Plan area and therefore the Local Plan will not result in the direct loss of land within an area designated as a European site. However, there is potential for the Local Plan to result in the loss of habitat outside a European site. Supporting habitat, also referred to as functionally linked habitat[64], may be located some distance from a European site. The fragmentation of habitats through the loss of connecting corridors would have the potential to hinder the movement of qualifying species.

[63] Environment Agency. 2015. River basin management plan for the Thames River Basin District Habitats Regulations Assessment Updated December 2015

[64] "*The term 'functional linkage' refers to the role or 'function' that land or sea beyond the boundary of a European site might fulfil in terms of ecologically supporting the populations for which the site was designated or classified. Such land is therefore 'linked' to the European site in question because it provides an important role in maintaining or restoring the population of qualifying species at favourable conservation status*". Source: Natural England. 2016. Commissioned Report. NECR207. Functional linkage: How areas that are functionally linked to European sites have been considered when they may be affected by plans and projects - a review of authoritative decisions.

4.7.2 As part of the screening assessment a detailed desk study has been undertaken to identify areas of functionally linked habitat. This drew on Natural England SSSI IRZ data, IUCN data, magic, priority habitat inventory data and aerial photography.

4.7.3 Areas of potentially functionally linked habitat likely to be lost to development were determined. These parcels of land were analysed in the context of their potential to provide suitable habitat to support the qualifying features of the relevant European sites. Where suitable habitat was identified, its potential to provide an important role in maintaining or restoring the qualifying features at a favourable conservation status was taken into consideration.

4.8 Public access and disturbance

4.8.1 Public access and disturbance can take a number of forms. Physical disturbance as a result of urbanisation may include damage to habitats through erosion, troubling of grazing stock, causing changes in behaviour to animals such as birds at nesting and feeding sites, spreading invasive species, litter and fly-tipping, tree climbing, wildfire and arson, noise and light pollution and vandalism. Typically, disturbance of habitat and species is the unintentional consequence of people's presence which can impact breeding success and survival. In particular, problems can be associated with dogs and cats, such as predation, disturbing birds and dog fouling.

4.8.2 Elsewhere in the UK, public access and disturbance threats have been considered in terms of buffer distances. These have been determined through analysis of visitor and recreational survey data and baseline European site information. The broad principle of buffer zones is one component of the HRA screening process for public access and disturbance. This process also takes into consideration other factors such as recreational management at sites, proximity to settlements and existing / proposed recreational resource.

4.8.3 Urbanisation effects relate to issues where development is close to a European site boundary. These effects often include impacts such as cat predation, lighting, fly tipping and vandalism. These impacts are particularly relevant for allocations that are proposed within approximately 400m of a European site. Given no European sites are located within the Plan area, or within 400m of a European site, no further consideration is given to urbanisation impacts under the public access and disturbance theme.

4.9 In-combination screening

4.9.1 As set out in **section 3.6,** and in compliance with Regulation 105 of the Habitats Regulations, HRA is required to assess whether the Local Plan will have an effect on a European site *either* alone *or* in-combination with other plans and projects. As such an in-combination assessment has been undertaken as part of the HRA process at both the screening stage (where no LSE are considered possible alone but in-combination effects are likely) and at the appropriate assessment stage (where, following appropriate assessment and mitigation, an insignificant adverse effect is still likely which has the potential to act in-combination with other plans and projects). **Appendix D** provides a review of other plans and projects that have been considered in the in-combination assessment.

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4.9.2 The DTA Handbook[65] notes that *"where an aspect of a plan could have some effect on the qualifying feature(s) of a European site, but that aspect of the plan alone are unlikely to be significant, the effects of that aspect of the plan will need to be checked in combination firstly, with other effects of the same plan, and then with the effects of other plans and projects".*

4.9.3 The following points describe how the in-combination effect of those plans and projects (**Appendix D**) have been considered in the HRA at both screening and appropriate assessment stages.

- Air quality LSEs on all European sites within the HRA study area in-combination with the Local Plan have been taken into consideration within the traffic modelling. This includes current and future growth within the Local Plan area and the wider area as set out in the SOCG methods.
- The WCS provides an assessment of development forecast in the Gatwick Sub-Region on European sites for individual authority areas alone and in-combination. In addition, the water resource assessment will take into consideration the impact of the Local Plan alone and in-combination with other development located in the Sussex North Water Resource Zone.
- Consideration of recreational in-combination effects have drawn on published literature and visitor surveys which have determined zones of recreational influence.

4.9.4 The assessment of potential in-combination effects has not resulted in additional impact pathways being screened in, however, a number of links between other plans and projects and the Local Plan have been identified.

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[65] Ibid.

5 European sites

5.1 Ashdown Forest SAC

5.1.1 Ashdown Forest SAC comprises an area of open lowland heath on the ridge of the High Weald Area of Outstanding Natural Beauty, located approximately 30 miles from London within Sussex. The underlying geology of the SAC, which is sandstone, and its exposed location have resulted in poor infertile soils which support both wet and dry heathland, valley mires and damp woodland.

5.1.2 The qualifying habitats of the SAC include both dry and wet heaths. The European dry heath is an extensive example of the south-eastern H2 *Calluna vulgaris – Ulex minor* community. This vegetation type 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.* The North Atlantic wet heath comprises one of the largest single continuous blocks of lowland heath in south-east England, with both European dry heaths and, in a larger proportion, wet heath present. The M16 *Erica tetralix – Sphagnum compactum* wet heath element provides suitable conditions for several species of bog-mosses Sphagnum spp., bog asphodel *Narthecium ossifragum*, deergrass *Trichophorum cespitosum*, common cotton-grass *Eriophorum angustifolium*, marsh gentian *Gentiana pneumonanthe* and marsh clubmoss *Lycopodiella inundata*[66].

5.1.3 The qualifying species of the SAC are great crested newt (*Triturus cristatusI)*.

5.1.4 The SIP for Ashdown Forest SAC and SPA notes that the site is vulnerable to air pollution, and in particular atmospheric nitrogen deposition (see **Table 4.1**), public access and disturbance impacts and hydrological change.

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[66] Natural England 2019. Ashdown Forest SAC Conservation Objectives Supplementary Advice. http://publications.naturalengland.org.uk/file/6494201252675584 [Date Accessed 15/09/20].

Air Quality

5.1.6 The dry and wet heaths within Ashdown Forest SAC are known to be sensitive to changes in air quality. Nitrogen deposition is currently within the 10-20 kg/ha/yr critical load for these habitat types at an average of 14 kg/ha/yr[67]. No Critical Load has been assigned to the EUNIS classes for meso/eutrophic systems upon which great crested newts rely. These systems are often phosphorus limited (or N/P co-limiting) and often associated with agricultural land use sources. There are a number of strategic roads (A and B grade roads) located within 200m of Ashdown Forest SAC. A number of non-strategic roads also pass throughout and close to the SAC. Ashdown Forest SAC is located in Wealden District. As noted in **Table 4.2** Wealden is one of the key commuting origins of traffic to / from Crawley.

5.1.7 Traffic modelling was undertaken to inform the development of the Local Plan. This modelling was prepared in compliance with the methodologies set out in the Ashdown Forest Statement of Common Ground (SoCG)[68]. Changes in daily traffic flows as a result of the Local Plan alone, and in-combination with other plans and projects, were examined as part of the screening exercise to determine LSEs. The Natural England thresholds, of 1000 AADT (and 200 HDV), were used as a guide to determine whether a more detailed assessment of the impact of emissions from road traffic was require. The following strategic road links located within 200m of the SAC were included in the air quality screening assessment in line with the SoCG method.

- A22 (Royal Ashdown Forest Golf Course);
- A22 (Wych Cross);
- A22 (Nutley);
- A275 (Wych Cross); and
- A26 (Poundgate).

5.1.8 No exceedances of the 1,000 AADT (or 200 HDV) threshold was observed for the Local Plan alone at any of the above links. In addition, there was no exceedance of the 200 HDV threshold for the Local Plan alone.

5.1.9 As the Local Plan was shown to be below the screening threshold 'alone' the same screening threshold was applied to the Local Plan in-combination with other plans and projects. Exceedances were noted for the Local Plan when taken in-combination with other plans and projects on the A22 (Wych Cross), A22 (Nutley), A275 (Wych Cross) and A26 (Poundgate). When taken in-combination there was an exceedance of 200 HDV on the A274 (Wych Cross), A22 (Wych Cross) and A22 (Nutley).

5.1.10 A reduction in traffic flows was observed for the Local Plan both alone and in-combination on the A22 (Royal Ashdown Forest Golf Course) link.

5.1.11 As such potential LSEs associated with reductions in air quality as a result of the Local Plan in-combination with other plans and projects were considered likely. **This site will therefore be considered further in the HRA process in terms of air quality.**

[67] Air Pollution Information System (APIS). Available at: http://www.apis.ac.uk/srcl/select-a-site?SiteType=SAC&submit=Next [Date Accessed: 15/09/20]

[68] The South Downs National Park Authority, Chair of the Ashdown Forest Working Group. Ashdown Forest Statement of Common Ground. April 2018. Available at: https://www.lewes-eastbourne.gov.uk/_resources/assets/inline/full/0/286630.pdf [Date Sourced: 15/09/20]

Hydrology

5.1.12 Ashdown Forest SAC is located downstream of the Plan area within the River Ouse and River Medway catchments. The WCS[69] indicates that there are no upstream WwTWs from the designated site and therefore impacts due to a deterioration in water quality through this pathway of impact are unlikely. In addition, the WCS confirms that sufficient water supply exists to meet demand required for the Local Plan alone and in-combination. It is therefore considered unlikely that the Local Plan would result in hydrological issues at Ashdown Forest SAC either alone or in-combination with other plans and projects. **This site will therefore not be considered further in the HRA process in terms of hydrology.**

Public Access and Disturbance

5.1.13 Public access and disturbance threats are noted in the SIP to be related to increased visitor pressures and disturbance on populations of Dartford Warbler and Nightjar which are the qualifying features for the Ashdown Forest SPA and therefore discussed further in **Section 5.2**.

5.2 Ashdown Forest SPA

5.2.1 The qualifying features of the SPA are the breeding populations of Dartford Warbler (*Sylvia undata*) and Nightjar (*Caprimulgus europaeus*).

5.2.2 As noted above, the SIP states that Ashdown Forest SAC and SPA are vulnerable to air pollution and in particular atmospheric nitrogen deposition (see **Table 4.1**), public access and disturbance impacts and hydrological change.

Air Quality

5.2.3 The structure and function of the habitats which support Nightjar and Dartford Warbler (as set out in **Section 5.1**) are noted to be sensitive to changes in air quality. Exceeding critical values for air pollutants may result in changes to the chemical status of its habitat substrate, accelerating or damaging plant growth, altering vegetation structure and composition. As summarised above for Ashdown Forest SAC potential LSEs associated with reductions in air quality as a result of the Local Plan in-combination with other plans and projects are likely. **This site will therefore be considered further in the HRA process in terms of air quality impacts on habitats for which the SAC is designated, and indirect impacts upon qualifying species for which the SPA is designated.**

Hydrology

5.2.4 As noted above Ashdown Forest SAC is located downstream of the Plan area within the River Ouse and River Medway catchments. It is therefore considered unlikely that the Plan would result in hydrological issues at Ashdown Forest SPA either alone or in-combination with other plans and projects. **This site will therefore not be considered further in the HRA process in terms of hydrology.**

[69] Ibid.

Public Access and Disturbance

5.2.5 Natural England's SIP and Supplementary Advice[70] for Ashdown Forest SPA identify public access and disturbance as a threat/pressure. This threat relates to the impact of public disturbance on the breeding populations of Nightjar and Dartford Warbler. Natural England's Supplementary Advice notes that disturbing effects can result in '*changes to feeding or roosting behaviour, increases in energy expenditure due to increased flight, abandonment of nest sites and desertion of supporting habitat (both within or outside the designated site boundary where appropriate). Such disturbance has the potential to 'affect successful nesting, rearing, feeding and/or roosting, and/or may reduce the availability of suitable habitat as birds are displaced and their distribution within the site contracts'. Nightjar is a bird known to be sensitive to disturbance. Disturbance caused by human activity may take a variety of forms including noise, light, sound, vibration, trampling, presence of people, animals and structures*'. The Advice goes on to note that '*freely roaming dogs can exacerbate the disturbance caused by people visiting the site where they can inadvertently trample on, or flush, birds from their nest leaving chicks or eggs to die'*. Visitor surveys were undertaken in 2008 and 2016 to better understand the impact of visitor disturbance on Nightjar and Dartford Warbler populations.

5.2.6 The 2008 visitor survey was undertaken by UE Associates to investigate visitor access patterns and points of visitor origin at Ashdown Forest SPA[71]. Following this, further work was commissioned by Natural England in 2010 to determine the impact of visitors upon Nightjar and Dartford Warbler populations.

5.2.7 On the basis of this visitor survey work, the affected Local Planning Authorities (Wealden, Mid Sussex, Lewes, Tunbridge Wells, Tandridge and Sevenoaks, together known as the SAMMS Partnership) agreed to take a co-ordinated and consistent strategic approach to the collection of developer contributions required to fund mitigation in the form of access management and monitoring (Strategic Access Management and Monitoring Scheme (SAMMS)). This strategic approach was applied to an 'outer' zone of influence of 7km which was identified as the zone within which recreational impacts were considered to be most likely to impact the qualifying features of the SPA.

[70] Natural England 2019. Ashdown Forest SAC Conservation Objectives Supplementary Advice. http://publications.naturalengland.org.uk/file/6754256153739264 [Date Accessed 15/09/20].

[71] Ashdown Forest Visitor Survey UE Associates 2009

5.2.8 In 2016, an updated visitor survey was undertaken by Footprint Ecology to ensure the strategic approach was based upon up to date visitor survey data[72]. This indicated that dog walking (69%) was the most common activity undertaken on site. Postcode data was collected as part of this survey which allowed home origin location to be mapped. This showed a wide scatter of visitors across Sussex from London to the south coast. The average straight-line distance between the home location and the survey point was 8,402m (median 4,870m). A quarter (25%) of interviewees lived within 1,459m of the survey point and three quarters (75%) lived within 9,643m. Analysis of the results by Footprint Ecology indicated that the majority of frequent visitors originated from closer locations to Ashdown Forest, with 72% originating from Wealden (12% form Mid-Sussex and 5% from Tunbridge Wells). When filtering data for dog walkers only, Footprint Ecology found the visitor survey results indicated 79% of dog walkers come from Wealden. The 2016 survey indicated the 7km zone of influence still captured the majority of visitors and the majority of frequent visitors to the SPA and SAC.

5.2.9 In terms of Crawley specifically, the home postcode data indicated that 1 visitor out of a total of 434 visitors from home came from Crawley (i.e. 0.23% of all visitors originated from Crawley). The low number of Crawley residents visiting this site reflects the fact that there are a number of alternative locations for recreational activity both within and adjacent to the borough.

5.2.10 As noted in the January 2020 HRA Screening Report[73] the most notable resource for Crawley residents is Tilgate Park, a semi natural park, immediately adjoining the town and covering approximately 90 hectares. In addition, other notable parks and natural greenspaces include Grattons Park, Bewbush Water Gardens and Ifield Millpond, Ifield Meadows, and Buchan Park on the Plan area boundary. A number of other Historic Parks and Gardens within the borough include Worth Park, Broadfield Park, Goffs Park, and Memorial Gardens.

5.2.11 The Council's Open Space study[74] identifies that existing provision of natural green space within the borough is equivalent to a local provision of 2.64ha per 1000 population. Future provision is forecast to be 2.25ha per 1000 population. This compares favourably to Natural England's recommended standard of 2.0 ha per 1000. The Open Space study notes that natural green space covers 296.62ha and accounts for 44.85% of Crawley's open space provision, with nearly half of sites (43%) falling into the Fair assessment banding (43%).

5.2.12 On the basis of the Footprint Ecology visitor survey data, the SAMMS partnership signed up to a Statement of Common Ground in 2019 to which Natural England, as the Statutory Consultee, was party. This establishes a 7km mitigation zone of influence within which developer contributions for new development are required to contribute to the implementation of SAMMS and also delivery of SANG where appropriate to mitigate adverse impacts on the integrity of Ashdown Forest SPA due to increased visitor pressure.

[72] Liley, D., Panter, C. & Blake, D. (2016). Ashdown Forest Visitor Survey 2016. Unpublished report.

[73] Ibid.

[74] The Environment Partnership. December 2020. Open Space, Sport and Recreational Assessment.

5.2.13 Crawley does not lie within the 7km zone of influence and at its closest point is located approximately 9.6km from the SPA. The closest housing allocation (Land East of Balcombe Road/Street Hill) to the SPA is located approximately 9.7km to the north west.

5.2.14 Given the location of Crawley outside of the 7km zone of influence, it is considered that there would be no impact on Ashdown Forest SPA and SAC alone or in-combination as a result of increased recreational pressure. **This site will therefore not be considered further in the HRA process in terms of public access and disturbance.**

5.3 Mole Gap to Reigate Escarpment SAC

5.3.1 The Mole Gap to Reigate Escarpment SAC is located on a chalk ridge which forms the escarpment of the North Downs in Surrey. The River Mole cuts through the escarpment resulting in natural chalk cliffs. The SAC is highly wooded but with extensive areas of open downland, particularly on the south- facing escarpment. The habitat mosaic includes very species-rich chalk grassland, beech, ash and yew woodland, mixed chalk scrub including juniper, and on the plateau, an extensive area of 'chalk heath' where chalk-loving plants grow alongside those typically associated with acidic soils[75].

5.3.2 The qualifying features of the SAC include a number of habitats (listed below), great crested newts and Bechstein's bat *Myotis bechsteinii.*

- *Stable xerothermophilous* formations with Buxus sempervirens on rock slopes (*Berberidion p.p.*) *Sclerophyllous scrub* (matorral);
- Semi-natural dry grasslands and scrubland facies on calcareous substrates (*Festuco-Brometalia*) (this includes the priority feature "important orchid rich sites");
- *Taxus baccata* woods of the British Isles;
- European dry heaths; and
- *Asperulo-Fagetum* beech forests.

5.3.3 Natural England's SIP for the site indicates that the SAC is vulnerable to public access and disturbance impacts, highlighting in particular trampling of orchid-rich grasslands, repetitive disturbance to great crested newt breeding ponds, and spread of disease. In addition, Natural England's Supplementary Advice identifies the potential sensitivity of the SAC to air quality impacts in terms of the deposition of airborne pollutants, as well as to hydrological changes. This also identifies the sensitivity of Bechstein bat roosting habitat (disused lime kilns and caverns at the site) to disturbance effects and the importance of maintaining commuting routes from roost into surrounding habitat and foraging areas.

Air Quality

5.3.4 The European dry heaths, natural box scrub, dry grasslands and scrublands on chalk or limestone, beech forests on neutral to rich soils and yew-dominated woodland are under threat from atmospheric nitrogen deposition. Species such as Bechstein's bat and great crested newt are also under threat from atmospheric nitrogen deposition as they are reliant upon these habitats.

[75] Natural England 2019. Mole Gap to Reigate Escarpment SAC Conservation Objectives Supplementary Advice. http://publications.naturalengland.org.uk/file/6354450398838784 [Date Accessed 15/09/20].

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5.3.5 **Table 5.1** below summarises the critical levels and current deposition at Mole Gap to Reigate Escarpment SAC. All data has been taken from the Air Pollution Information System (APIS) [76].

Table 5.1: *Nitrogen deposition Critical Loads of Mole Gap to Reigate Escarpment SAC*

Qualifying features	Relevant Nitrogen Critical Load Class	Empirical Critical Load (kg N/ha/yr)	Current Nitrogen Deposition (kg N/ha/yr)
Taxus baccata woods of the British Isles (H91J0)	Coniferous woodland	5-15	Max: 28.9 Min: 24.4 Average: 24.9
European dry heaths (H4030)	Dry heaths	10-20	Max: 17.3 Min: 15.1 Average: 15.3
Asperulo-Fagetum beech forests (H9130)	Fagus woodland	10-20	Max: 28.9 Min: 24.4 Average: 24.9
Stable xerothermophilous formations with *Baxus sempervirens* on rock slopes (*Berberidion* pp) (H5110)	Sub-atlantic semi-dry calcareous grassland	15-25	Max: 28.9 Min: 24.4 Average: 24.9
Semi-natural dry grasslands and scrubland facies on calcareous substrates (*Festuco-Brometalia*) (H6210)	Sub-atlantic semi-dry calcareous grassland	15-25	Max: 17.3 Min: 15.1 Average: 15.3
Myotis bechsteinii Bechstein's bat (S1323)	Broadleaved deciduous woodland	10-20	Max: 28.9 Min: 24.4 Average: 24.9
Triturus cristatus Great crested newt (S1166)	No comparable habitat with established critical load estimate available.	n/a	Max: 13.2 Min: 12.7 Average: 13.1

5.3.6 The current levels of nitrogen deposition at Mole Gap to Reigate Escarpment SAC are within the critical load for European dry heaths and dry grasslands and scrublands on chalk or limestone that receive an average of 15.3 kg N/ha/yr. However, the current levels of nitrogen deposition exceed the critical load for all other habitat types as the current average is 24.9 kg N/ha/yr[77].

[76] Air Pollution Information Systems (2017) Site relevant critical loads, available at: http://www.apis.ac.uk/srcl/select-a-feature?site=UK9012171&SiteType=SPA&submit=Next [Date Accessed: 15/09/20]

[77] Air Pollution Information System APIS (2016) Site relevant critical loads, available at: http://www.apis.ac.uk/srcl [Date Accessed: 15/09/20]

5.3.7 Three sections of the Mole Gap to Reigate Escarpment SAC lie within 200m of a motorway or 'A' road. The M25 is located within 200m of an area of the south east of Mole Gap to Reigate Escarpment SAC. The A24 runs north to south within 200m of two designated areas of the Mole Gap to Reigate Escarpment SAC. The A25 runs parallel with the south of Mole Gap to Reigate Escarpment SAC and in some areas is within 200m of the European designated site. The A217 to the north of Reigate runs immediately adjacent to the eastern section of the SAC. In addition, a number of B grade and smaller roads that form the minor road network lie within 200m of the SAC.

5.3.8 As set out in **Table 4.2** national statistics commuting data shows that Mole Valley District and Reigate and Banstead District, within which the SAC is located, are key commuting destinations for people travelling to and from work from the Plan area.

5.3.9 A review of traffic modelling data available for strategic road links within 200m of the SAC was undertaken. Changes in daily traffic flows as a result of the Local Plan alone, and in-combination with other plans and projects, were examined as part of the screening exercise to determine LSEs. The Natural England thresholds, of 1000 AADT (and 200 HDV), were used as a guide to determine whether a more detailed assessment of the impact of emissions from road traffic was require. The following strategic road links which form part of the Local Plan traffic model and which are located within 200m of the SAC were included in the air quality screening assessment.

- A25;
- A217;
- A24;
- B2032; and
- M25 (between Junction 8 and Junction 9).

5.3.10 Exceedances of the 1,000 AADT (or 200 HDV) threshold was observed on the M25 and A217 for the Local Plan alone. In addition, there was an exceedance of the 200 HDV threshold for the Local Plan alone at the M25.

5.3.11 As the Local Plan was shown to be below the screening threshold 'alone' for a number of links, the same screening threshold was applied to the Local Plan in-combination with other plans and projects. Exceedances were noted for the Local Plan when taken in-combination with other plans and projects at all other links within 200m of the SAC. When taken in-combination there was an exceedance of 200 HDV on the A217 and A24.

5.3.12 As such potential LSEs associated with reductions in air quality as a result of the Local Plan both alone and in-combination with other plans and projects were considered likely. **This site will therefore be considered further in the HRA process in terms of air quality.**

Hydrology

5.3.13 Water quality and quantity have been identified as a threat to the 'Dry heaths' and 'great crested newts' qualifying features of Mole Gap to Reigate Escarpment SAC. Of particular concern is the condition of the network of ponds that support the local newt population. Poor water quality or inadequate quantities of water can adversely affect the structure and function of ponds, and ultimately their suitability for great crested newts.

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5.3.14 Natural England's Mole Valley to Reigate Escarpment Supplementary Advice presents attributes which are ecological characteristics of the designated species and habitats within this site[78]. The following Qualifying Features of this site are noted to be vulnerable to hydrological changes.

- European Dry Heath; and
- Great crested newt.

5.3.15 The SIP notes that for European Dry Heath habitat "*the lowland heath habitat at Headley Heath exhibits a degree of variation related to soil wetness. Areas of the site with impeded drainage have a distinctive composition with increased frequency of purple moor-grass Molinia caerulea, common bent Agrostis capillaris and rush Juncus species. This natural variation provides additional habitat diversity which will increase the suitability of the habitat for reptiles, wetland invertebrates and birds*". It states that surface water wetness is likely to be related to rainfall rather than groundwater flow and that this may only require on-site safeguards to protect water supply and water quality.

5.3.16 In terms of the great crested newt qualifying feature the SIP notes that "*great crested newt populations are critically dependent on the quality and quantity of water supply to their supporting wetland habitats. Poor water quality and inadequate quantities of water can adversely affect the structure and function of ponds and their suitability for great crested newt*". It states that the ponds at Headley Heath are fed by rainfall and surface water flow.

5.3.17 The Plan area lies within the River Mole management catchment. The River Mole, a tributary of the River Thames, flows along the western boundary of the Plan area with a number of smaller watercourses throughout the Plan area, such as Gatwick Stream and Crawter's Brook, feeding into the River Mole, which passes downstream through the SAC designation.

5.3.18 Given the presence of hydrological links from the Plan area to the SAC **this site will therefore be considered in further detail in the HRA process in terms of hydrological impacts.**

Public access and disturbance

5.3.19 Mole Gap to Reigate Escarpment SAC is accessible via several Public Right of ways (PRoWs) and The North Downs Way National Trail that runs in an east to west direction through the south of Mole Gap to Reigate Escarpment SAC. There are two car parks located to the east of the site and two car parks located to the south of the site including Box Hill Café and visitor centre.

[78] Natural England. 2019. European Site Conservation Objectives: Supplementary advice on conserving and restoring site features. Mole Gap to Reigate Escarpment Special Area of Conservation (SAC). Available at: http://publications.naturalengland.org.uk/file/6354450398838784 [Date Accessed: 15/09/20].

5.3.20 As part of the 2008 Mole Valley Local Development Framework (LDF) Appropriate Assessment[79] a review of visitor surveys undertaken in 2004 by the National Trust and in 2005 and 2006 by Bournemouth University was undertaken (see Appendix C of the Mole Valley Appropriate Assessment). Analysis of post code data from the National Trust surveys indicated that no visitors were recorded from Crawley. The Bournemouth surveys noted that the majority of people coming to the SAC were from further afield, with over 80% (82% at Headley, rising to some 93% at Reigate Hill/Gatton originating from over 5 miles away and over 54% (Headley), rising to 81% (Reigate Hill/Gatton) originating from over 15 miles away. The Mole Valley LDF Appropriate Assessment concluded that, on the basis of these surveys, recreational pressure at the Mole Gap to Reigate Escarpment SAC is focused mainly around honey pot sites, with the majority of impact being within a small radius of the car parks. The studies also showed that, although there are local visitors to the sites, large numbers originate from over 15 miles (24.14km) and therefore the majority of recreational pressure is caused by visitors travelling from further afield.

5.3.21 These honey pot sites are located 12.5km, 12.6km and 9.9km respectively to the north west of the Plan area. The closest housing allocation – North East Sector – is located approximately 16.1km, 15.9km and 12.9km respectively from these honey pot sites.

5.3.22 A guidance note prepared by Mole Valley District Council[80] acknowledges that there is already considerable recreational pressure, requiring high levels of management. It notes that further development beyond the borough boundary may increase the volume of visitors to the site, requiring careful management to ensure that no significant damage is caused to the important features of this European Site. This guidance notes that as a result of the Appropriate Assessment of Mole Valley's LDF, Policy CS15 safeguards a buffer zone of 800m around the SAC. Within which there is a presumption "*against any increase in residential or employment related development…unless its impact is mitigated*". The guidance note also states that large development outside of the 800m buffer is likely to attract significant visitor numbers. It notes that large residential developments should consider the impacts upon the SAC and provide suitable mitigation.

5.3.23 At its closest point the Plan area lies within 9.4km of the SAC, which is considerably outside the 800m buffer. It is therefore considered that any impact of the Plan alone would have a negligible effect on Mole Gap to Reigate Escarpment SAC alone.

5.3.24 Given the large recreational draw of the SAC across London and the South East and the distance of the Plan area from the key car park locations (honeypot sites) it is considered likely that an in-combination visitor contribution from Crawley will be negligible.

5.3.25 Given the good availability of existing local recreation and open space resource within and closer to the Plan area (as described in **Section 5.2**) it is considered that the frequency of visits from the Plan area would also be negligible. **This site will therefore not be considered further in the HRA process in terms of public access and disturbance.**

[79] Mole Valley Distrcit Council. 2008. Mole Valley Local Development Framework Mole Valley Appropriate Assessment.

[80] Mole Valley District Council (2012) Mole Gap to Reigate Escarpment SAC Guidance Notice, Available at: https://www.molevalley.gov.uk/media/pdf/l/l/SAC_Guidance_FINAL.pdf [Date Accessed: 04/09/19]

Habitat loss and fragmentation

5.3.26 The SAC is designated for two mobile species, great crested newt and Bechstein's bat.

5.3.27 Whilst great crested newts rely on water bodies to breed and during the aquatic stages of their life cycle, they are known to travel approximately 500m from their breeding pond habitat during the terrestrial phase of their lifecycle[81,82]. Depending on the location of the ponds within the SAC terrestrial habitat may include land outside the SAC boundary. The Plan area is located at its closest point 9.6km from the SAC and therefore it is considered that functionally linked great crested newt habitat will not be affected by development set out in the Local Plan.

5.3.28 The Bat Conservation Trust (BCT) notes that Bechstein's bat are predominantly associated with broadleaved woodlands, using stream corridors and hedgerows to commute to foraging areas[83]. The BCT has defined a number of species-specific Core Sustenance Zones (CSZ). These refer to the area surrounding a communal bat roost within which habitat availability and quality will have a significant influence on the reliance and conservation status of the colony using the roost. For Bechstein's bat a CSZ of 1km is identified with moderate confidence. The BCT guidance therefore suggests that this CSZ should be increased to at least 3km to reflect the bat's specific habitat requirements[84]. As the Plan area is 9.6km from the SAC at its closest point it is therefore considered that functionally linked Bechstein's bat habitat will not be affected by the Local Plan. **This site will therefore not be considered further in the HRA process in terms of habitat loss and fragmentation impacts.**

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[81] Natural England (2015) Great crested newts: protection and licences. Available at: https://www.gov.uk/guidance/great-crested-newts-protection-surveys-and-licences [Date Accessed: 05/11/19]

[82] Langton, T.E.S., Beckett, C.L., and Foster, J.P. (2001), Great Crested Newt Conservation Handbook, Froglife, Halesworth.

[83] Bat Conservation Trust. 2016. Bat Surveys for Professional Ecologist. Good Practice Guidelines. Third Edition.

[84] Bat Conservation Trust. 2016. Core Sustenance Zone. https://cdn.bats.org.uk/pdf/Resources/Core_Sustenance_Zones_Explained_04.02.16.pdf?mtime=20190219173135&focal=none

5.4 South West London Waterbodies SPA

5.4.1 The South West London Waterbodies SPA comprises a series of embanked water supply reservoirs and former gravel pits which support a range of man-made and semi-natural still, open-water habitats. The complex is situated to the west of London on the broad floodplain of the River Thames. The lakes and reservoirs have varying levels of public use. Some are closed to the public, but most have long- established recreational use. The uses include sailing, canoeing, water-skiing, fishing, birdwatching, diver training and open water swimming[85].

5.4.2 The SPA is designated for the internationally important non-breeding numbers of Gadwall (*Anas Strepera)* and Shoveler *(Anas clypeata)* that the waterbodies support.

5.4.3 The SIP indicates that South West London Waterbodies SPA is vulnerable to public access and disturbance impacts with Supplementary Advice[86] indicating that the site is also vulnerable to air quality and hydrology impacts (see **Table 4.1**).

Air Quality

5.4.4 The structure and function of habitats which support South West London Waterbodies SPA may be sensitive to changes in air quality. Exceeding critical values for air pollutants such as ammonia (NH_3), oxides of nitrogen (NO_x) and sulphur dioxide (SO_2), may result in changes to the chemical status of the waterbodies[87]. As a result, accelerating or damaging plant growth, altering vegetation structure and composition may occur affecting the quality and availability of feeding or roosting habitat for the Gadwall and Shoveler.

5.4.5 South West London Waterbodies SPA and Ramsar sites are located within a number of districts including; Spelthorne, Windsor and Maidenhead, Runneymead and Elmbridge. None of these are highlighted as a key commuting destination in the National Statistics data (**Table 4.2**). Given the location of this designation from the Local Plan area (29.6km to the north west of the Plan area) it is not considered likely that air quality impacts from additional traffic due to growth in the Plan area will adversely impact these designations. **This site will therefore not be considered further in the HRA process in terms of air quality.**

[85] Natural England. 2018. European Site Conservation Objectives: Supplementary advice on conserving and restoring site features. South West London Waterbodies SPA. Available at: http://publications.naturalengland.org.uk/file/5893345162821632 [Date Accessed: 15/09/20].

[86] Ibid.

[87] Ibid.

Hydrology

5.4.6 Water quality and quantity have been identified as a threat to the Gadwall and Shoveler qualifying features of the South West London Waterbodies SPA and Ramsar. Of particular concern is chemical or physical pollutants which negatively impact the natural flora and fauna of the waterbodies and are likely to be damaging to the value of the sites as a habitat for Gadwall and Shoveler. Poor water quality may significantly reduce habitat quality and also reduce food availability for the qualifying features. The SIP for South West London Waterbodies SPA and Ramsar notes that water quality is determined by "*a range of factors including the quality of groundwater supply, water quality in feeder streams, the quantity of aquatic plants present, the amount of mixing taking place in the water column and the amount of disturbance of accumulated sediment taking place, as well as inputs from surrounding vegetation (particularly trees) and nutrients in rainfall*"[88]. Water supply and management of water levels are also important considerations.

5.4.7 The Plan area lies within the Thames river basin and within the River Mole management catchment. The River Mole, a tributary of the River Thames, flows along the western boundary of the Plan area with a number of smaller watercourses throughout the Plan area, such as Gatwick Stream and Crawter's Brook, feeding into it.

5.4.8 The River Mole flows into the River Thames at Hampton Court, approximately 28.3km to the north of the Plan area and downstream of the South West London Waterbodies SPA. Due to the location of the River Mole's confluence with the River Thames downstream of the SPA, there are not likely to be any adverse impacts on the integrity of the South West London Waterbodies SPA due to water quality impacts associated with the development set out in the Local Plan either alone or in-combination. **This site will therefore not be considered further in the HRA process in terms of hydrological change.**

Public access and disturbance

5.4.9 All qualifying features of Southwest London Waterbodies SPA and Ramsar, namely the habitats and non-breeding populations of Gadwall and Shoveler, are recognised as being under threat from public access associated disturbances.

5.4.10 A key environmental condition of South West London Waterbodies SPA and Ramsar is a lack of disturbance during the winter months of October to March. Disturbances of sufficient extent, intensity or duration can cause the Gadwall and Shoveler populations to abandon the site.

5.4.11 Different waterbodies of the SPA offer different levels of access to the public, with some more restricted than others. Where possible, recreational use across much of the SPA is managed through the Potentially Damaging Operations Scheme. Any operations that may undermine the integrity of the SSSIs, which underpin the SPA, therefore require consent from Natural England.

5.4.12 Given the location and distance of the SPA from the Plan area and the presence of sufficient alternative recreational resources closer to the Plan area, **this site will not be considered further in the HRA process in terms of public access and disturbance impacts.**

[88] Ibid.

5.5 South West London Waterbodies Ramsar

5.5.1 As with the SPA, the South West London Waterbodies Ramsar site is designated for the internationally important non-breeding numbers of Gadwall and Shoveler. As such the above SPA screening conclusions apply to the Ramsar designation.

5.6 Arun Valley SAC

5.6.1 The Arun Valley SAC is located in the South Downs in West Sussex approximately 24.6km to the south west of the Plan area. It consists of low-lying grazing marsh, predominantly on alluvial soils, but with an area of peat derived from a relict raised bog. Local differences in soil conditions and water supply have resulted in a range of ecological conditions and a diverse flora and fauna across the site. The southern components of the Arun Valley are fed by calcareous springs, with the northern components, where the underlying geology is Greensand, being fed by more acidic water[89].

5.6.2 The qualifying features of the SAC is the little whirlpool ram's-horn snail (*Anisus vorticulus*). It relies on unpolluted calcareous water in marsh drains with a dense aquatic flora. It is particularly associated with ditches with a diverse flora but little emergent vegetation. The Arun Valley SAC designated area provides one of the three main population centres for this species of snail in the UK.

5.6.3 The SIP for the Arun Valley SAC and the Arun Valley SAC Supplementary Advice[90] indicates that the qualifying feature of this designation is highly sensitive to changes in water levels and water pollution (in particular increased levels of phosphates)[91].

5.6.4 Natural England have confirmed that they are currently reviewing the condition of the Arun Valley European sites over the next twelve months and anticipate they will be in unfavourable condition.

Hydrology

5.6.5 The WCS[92] indicates that no WwTW serving the Crawley area will discharge to the Arun catchment. As such it can be concluded that there will be no direct water quality impacts on the Arun Valley SAC as a result of discharges from the Plan area.

5.6.6 As noted above Crawley north lies within the SES Water East Surrey WRZ, with Crawley lying with the Southern Water Sussex North WRZ and South East Crawley within the South East Water Haywards Heath WRZ. All three WRZs in the study area are classed as being under serious water stress with a number of deficits identified over the plan period.

[89] Natural England. 2019. European Site Conservation Objectives: Supplementary advice on conserving and restoring site features. Arun Valley SAC Available at: http://publications.naturalengland.org.uk/file/6257846618685440 [Date Accessed: 15/09/20].

[90] Ibid.

[91] Natural England. 2014. Site Improvement Plan. Arun Valley SPA and SCI. Available at: http://publications.naturalengland.org.uk/file/5185212862431232. Sourced: 08/09/20.

[92] Natural England. 2014. Site Improvement Plan. Arun Valley SPA and SCI. Available at: http://publications.naturalengland.org.uk/file/5185212862431232. Sourced: 08/09/20.

5.6.7 Part of Southern Water's Sussex North WRZ supply to the Crawley Borough Council area is obtained from a groundwater abstraction point at Hardham.

5.6.8 As noted in **Table 2.4**, the Environment Agency and Natural England have highlighted issues regarding the sustainability of abstractions from Hardham. Further discussions are required in order to assess future water demand associated with Local Plan development upon the this WRZ. It is noted that the Environment Agency and Natural England are currently working with Southern Water to try to identify a long term, more sustainable water supply. Whilst the adverse effect remains or is uncertain, it is important to ensure that development in Crawley does not add to this adverse effect[93]. Any reduction in water supply has the potential to have an LSE on the qualifying feature of the SAC. In addition to a reduction in water supply, a reduction in water levels may also have implications for water quality by causing a reduction in the potential for pollutant dilution. **This site will therefore be considered in further detail in the HRA process in terms of hydrological change.**

5.7 Arun Valley SPA

5.7.1 The Arun Valley SPA is designated for the non-breeding population of Bewick swan and assemblage of waterfowl (including: Shoveler *Anas clypeata*, Teal *Anas crecca*, Wigeon *Anas penelope*, Bewick's Swan *Cygnus columbianus bewickii.*) that the site supports.

5.7.2 Broad habitat types within the SPA designation which support these species of birds include the following:

- *Cynosurus cristatus-Centaurea nigra* lowland meadows;
- Inland wet grassland;
- *Glyceria maxima* (Reed Sweet-grass) swamp;
- *Glyceria fluitans* (floating-sweet grass) water-margin vegetation; and
- Network of ditch systems.

5.7.3 As highlighted above the SIP for the Arun Valley SPA and the Arun Valley SPA Supplementary Advice[94] indicates that the qualifying features of this designation are highly sensitive to changes in water levels and water pollution (in particular increased levels of phosphates)[95]. The Supplementary Advice also notes the vulnerability of the qualifying species of birds to human disturbance. Given the distance of the Plan area from this designated area recreational and urbanisation impacts are not considered likely. This site will not be considered in further detail in the HRA process in terms of public access and disturbance impacts.

[93] Ruling of CJEU Coöperative Mobilisation case; Joined cases C-293/17 and C-294/17 (often referred to as the Dutch Nitrogen cases). C-293/17 and C-294/17 Judgment of the Court (Second Chamber) of 7 November 2018 in Coöperatie Mobilisation for the Environment UA and Vereniging Leefmilieu v College van gedeputeerde staten van Limburg and College van gedeputeerde staten van Gelderland. Requests for a preliminary ruling from the Raad van State. http://curia.europa.eu/juris/liste.jsf?language=en&num=C-293/17

[94] Natural England. 2019. Arun Valley SPA Conservation Objectives Supplementary Advice. Available at: http://publications.naturalengland.org.uk/file/6589245724819456 [Date Accessed: 16/09/20]

[95] Ibid.

Hydrology

5.7.4 As concluded above for the Arun Valley SAC, hydrological links and pathways exist from the Plan area to Arun Valley SPA. These may have implications for water resources and water quality which may affect habitats upon which the qualifying species of the SPA rely. **This site will therefore be considered in further detail in the HRA process in terms of hydrological change.**

5.8 Arun Valley Ramsar

5.8.1 The Arun Valley Ramsar is designated for a number of British Red Data Book species of invertebrates and plant species that it supports. In addition, it is also designated due to its winter waterfowl population and winter populations of Northern pintail (*Anas acuta*).

Hydrology

5.8.2 The Arun Valley Ramsar Information Sheet[96] identifies water extraction for public supply as a potential threat to the site's ecological character. As noted above due to sensitivities regarding extraction of public water supply at Hardham LSEs are possible. **This site will therefore be considered in further detail in the HRA process in terms of hydrological change.**

5.9 The Mens SAC

5.9.1 The Mens SAC is an area of ancient woodland in West Sussex and supports a significant population of barbastelle bat (*Barbastelle barbastellus*)[97]. The woodland comprises sessile oak (*Quercus petraea)* and pedunculate oak (*Quercus robur)*, beech (*Fagus sylvatica)*, holly (*Ilex aquifolium)* and locally, ash (*Fraxinus excelsior)*, birches (*Betula* spp.) and wild service tree (*Sorbus torminalis)*. Beech dominates the lighter soils over an understorey of holly and yew (*Taxus baccata)*. The SAC also supports important invertebrate, fungi, lichen and bryophyte assemblages. The qualifying features of the SAC include beech forests on acid soil and the barbastelle bat.

5.9.2 Natural England's SIP for the site indicates that the SAC is vulnerable to public access and disturbance impacts (in particular light pollution), change in land management, habitat connectivity and air pollution. In addition, Natural England's Supplementary Advice identifies the potential sensitivity of the SAC to changes in water quality and quantity in foraging grounds where bats feed on aquatic invertebrates. It notes that *"for many SAC features which are dependent on wetland habitats supported by surface and/or ground water, maintaining the quality and quantity of water supply will be critical, especially at certain times of year. Poor water quality and inadequate quantities of water can adversely affect the structure and function of this habitat type".*

[96] JNCC. 2008. Information Sheet on Ramsar Wetlands. Arun Ramsar. https://jncc.gov.uk/jncc-assets/RIS/UK11005.pdf Date Accessed: 14/09/20].

[97] Natural England 2019. The Mens SAC Conservation Objectives Supplementary Advice. http://publications.naturalengland.org.uk/file/5113429933424640 [Date Accessed 08/12/20].

5.9.3 A body of research has been undertaken since 1998 to identify barbastelle bat foraging habitat within the wider landscape[98]. This work involved radio-tracking and showed barbastelle bats forage up to 7km from their roost sites, within areas that lie to the east of The Mens SAC, principally on the floodplain of the River Arun[99]. This work notes that major threats to barbastelle bats include those affecting their roosts, foraging areas and connective landscape features between them, acknowledging that often these threats are indirect.

Air Quality

5.9.4 Both the beech forests on acidic soils and the barbastelle bat are sensitive to air pollution. However, Natural England's SIP notes that the sensitive features at The Mens SAC are currently considered to be in favourable condition. The Mens SAC is located approximately 21.7km to the south west of the Plan area at its closest point.

5.9.5 **Table 4.2** provides national statistics commuting destinations for people travelling to and from work from the Plan area. The Mens SAC is not located within one of these key commuting zones. Given the distance of the site from the Plan area and this commuting data it can be concluded that there will be no likely significant effects from the Local Plan at The Mens SAC from air pollution. **This site will therefore not be considered further in the HRA process in terms of air quality impacts.**

Hydrology

5.9.6 Water quality and quantity have been identified as a threat to the wetland habitats within the wider landscape which are used by barbastelle bats for foraging activity. In particular research indicates barbastelle bat forage in the Arun Valley. Poor water quality or inadequate quantities of water can adversely affect the structure and function of such wetland habitats and therefore the extent of foraging areas for the barbastelle bat.

5.9.7 As noted in **Section 5.6** hydrological links and pathways exist from the Plan area to Arun Valley. Changes in water quality and quantity may have implications for wetland foraging habitat upon which barbastelle bats rely. **This site will therefore be considered in further detail in the HRA process in terms of hydrological change.**

Public access and disturbance

5.9.8 As noted in Natural England's SIP barbastelle bats are vulnerable to light pollution which may be caused by development. The Mens SAC is located approximately 21.7km to the south west of the Plan area at its closest point. Light pollution will be focused in areas close to development across the Plan area. Given the distance of the SAC from the Plan area, **this site will therefore not be considered further in the HRA process in terms of public access and disturbance impacts.**

[98] Greenaway, F. 200. Advice for the management of flightlines and foraging habitats of the barbastelle bat Barbastellus barbastellus. English Nature Research Report, Number 657.

[99] Greenaway, F. 2008. Barbastelle bats in the Sussex West Weald 1997 – 2008.

Habitat loss and fragmentation

5.9.9 The SAC is designated for barbastelle bats which are mobile species and rely on connective habitat in the wider landscape for foraging. The Plan area is located a significant distance from The Mens SAC (21.7km at its closest point) and therefore direct habitat loss and fragmentation impacts upon foraging or designated habitat is not likely. However, as noted above, functional hydrological linkages between the Plan area and barbaselle bat foraging habitat in Arun Valley have been identified. Changes in water quality and quantity may have implications for wetland foraging habitat upon which barbastelle bats rely. **This site will therefore be considered in further detail in the HRA process in terms of habitat loss and fragmentation due to hydrological changes.**

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6 Screening

6.1 Policy screening

6.1.1 Each Local Plan policy has been appraised against the HRA screening criteria (see **Table 3.1**), taking into consideration case law and best practice. **Appendix E** provides the output of this screening exercise.

6.1.2 It is concluded that LSEs, either from the Local Plan alone or in- combination with other plans or projects, could be screened out for most policies. This is because the policies fell into the following categories (see **Table 3.1** for a description of each category):

- Category D: Environmental protection / site safeguarding;
- Category C: Proposal referred to but not proposed by the Plan;
- Category F: Policies or proposals that cannot lead to development or other change.

6.1.3 A number of policies were however considered likely to have an LSE. On the basis of this assessment, the following LSEs are explored in the appropriate assessment (Stage 2 of the HRA process – **Chapters 7 and 8**) in more detail. **Table 6.1** provides a summary of policies that have been screened in.

Table 6.1: *Summary of screened in policies*

Policy Number	Policy Name	Screening Category
EC1	Sustainable Economic Growth	Category I and L
EC4	Strategic Employment Provision	Category I and L
TC3	Town Centre Key Opportunity Sites	Category I and L
H2	Key Housing Sites	Category I and L
H8	Gypsy, Traveller and Travelling Showpeople Sites	Category I and L

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6.2 Sites screening

6.2.1 Housing and employment site allocations have been screened individually (**Appendix F**). LSEs have been screened in as follows:

- **Ashdown Forest SAC and SPA** – air quality LSEs in-combination;
- **Mole Gap to Reigate Escarpment SAC** – air quality LSEs alone and in combination;
- **Mole Gap to Reigate Escarpment SAC** – hydrology LSEs alone;
- **Arun Valley SAC** – hydrology LSEs alone;
- **Arun Valley SPA** – hydrology LSEs alone;
- **Arun Valley Ramsar** – hydrology LSEs alone; and
- **The Mens SAC** – hydrology (at functionally linked land) LSEs alone.

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7 Appropriate Assessment: Air Quality

7.1.1 Additional air quality modelling work is required to inform the HRA Appropriate Assessment. A detailed methodology has been prepared for the air quality modelling which is currently with Natural England for consultation. Once comments have been received the air quality model will be run and an Appropriate Assessment undertaken.

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8 Appropriate Assessment: Hydrology

8.1.1 Given the significant water supply challenges faced in the Sussex North Water Resource Zone, and the potentially significant ecological impacts of groundwater abstraction at Hardham, the Council is working with other local authorities, Southern Water, the Environment Agency and Natural England to assess the in-combination impacts of planned growth. This work will inform the Appropriate Assessment.

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9 Conclusions

9.1.1 Further work is currently being undertaken to explore air quality and hydrology LSEs upon the following European sites.

- Ashdown Forest SAC and SPA
- Mole Gap to Reigate Escarpment SAC
- Mole Gap to Reigate Escarpment SAC
- Arun Valley SAC
- Arun Valley SPA
- Arun Valley Ramsar
- The Mens SAC

9.1.2 Upon completion of the air quality modelling and hydrological work an Appropriate Assessment will be made to ascertain whether or not the Local Plan would have a significant adverse effect on the integrity of the above European sites. This will comprise an impact assessment and evaluation in view of each European site's conservation objectives. Where adverse impacts on site integrity are identified, consideration will be given to alternative options and mitigation measures if appropriate.

9.1.3 The output of the Appropriate Assessment will be reported upon in the Final HRA Report.

9.1.4 The Council, as the Competent Authority, will then have the responsibility to carry out the Integrity Test, which can be undertaken in light of the conclusions which will be set out in the Final HRA report.

9.1.5 The Final HRA Report will be submitted to Natural England, the statutory nature conservation body, for formal consultation. The Council must 'have regard' to their representations under the provisions of Regulations 63(3) and 105(2) prior to making a final decision as to whether they will 'adopt' the conclusions set out within the Final HRA report as their own.

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Appendix A: European Site Conservation Objectives

Ashdown Forest SAC[1]

Conservation objectives:

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

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

Qualifying Features:

H4010. Northern Atlantic wet heaths with Erica tetralix; Wet heathland with cross-leaved heath

H4030. European dry heaths

S1166. Triturus cristatus; Great crested newt

Ashdown Forest SPA[2]

Conservation objectives:

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

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

Qualifying Features:

A224 Caprimulgus europaeus; European nightjar (Breeding)

A302 Sylvia undata; Dartford warbler (Breeding)

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[1] Natural England (2018) Ashdown Forest SAC Conservation Objectives. Available at: http://publications.naturalengland.org.uk/publication/6183967367626752 [Date Accessed: 10/09/20]

[2] Natural England (2019) Ashdown Forest SPA Conservation Objectives. Available at: http://publications.naturalengland.org.uk/file/6233998355595264 [Date Accessed: 10/09/20]

Mole Gap to Reigate Escarpment SAC[3]

Conservation objectives:

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

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

Qualifying Features:

H4030. European dry heaths

H5110. Stable xerothermophilous formations with Buxus sempervirens on rock slopes (Berberidion p.p.); Natural box scrub

H6210. Semi-natural dry grasslands and scrubland facies: on calcareous substrates (Festuco-Brometalia) (important orchid sites); Dry grasslands and scrublands on chalk or limestone (important orchid sites)

H9130. Asperulo-Fagetum beech forests; Beech forests on neutral to rich soils H91J0. Taxus baccata woods of the British Isles; Yew-dominated woodland* S1166. Triturus cristatus; Great crested newt S1323. Myotis bechsteinii; Bechstein`s bat

South West London Waterbodies SPA[4]

Conservation objectives:

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

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

Qualifying features:

A051 Anas strepera; Gadwall (Non-breeding)
A056 Anas clypeata; Northern shoveler (Non-breeding)

[3] Natural England (2018) Mole Gap to Reigate Escarpment SAC Conservation Objectives. Available at: http://publications.naturalengland.org.uk/file/5690871244914688 [Date Accessed: 10/09/20]

[4] Natural England (2019) South West London Waterbodies SPA Conservation Objectives. Available at: http://publications.naturalengland.org.uk/file/5411059804667904 [Date Accessed: 10/09/20]

South West London Waterbodies Ramsar[5]

Ramsar sites do not have the Conservation Objectives in the same way as SPAs and SACs. Information regarding the designation of Ramsar sites is contained in INCC Ramsar Information Sheets. Ramsar Criteria are the criteria for identifying Wetlands of International Importance. The relevant criteria and ways in which this site meets the criteria are presented in the table below.

<table>
<tr><th>Ramsar Criterion</th><th>Justification for the application of each criterion</th></tr>
<tr><td>6</td><td>Ramsar criterion 6 – species/populations occurring at levels of international importance.
<table>
<tr><td colspan="2">Qualifying species/populations (as identified at designation): Species with peak counts in spring/autumn:</td></tr>
<tr><td>Northern shoveler, Anus clypeata, Northwest and Central Europe</td><td>397 individuals, representing an average of 2.6% of the GB population (5 year peak mean 1998/9- 2002/3)</td></tr>
<tr><td colspan="2">Species with peak counts in winter:</td></tr>
<tr><td>Gadwall, Anas strepera strepera, Northwest Europe</td><td>487 individuals, representing an average of 2.8% of the GB population (5 year peak mean 1998/9- 2002/3)</td></tr>
</table></td></tr>
</table>

Arun Valley SAC[6]

Conservation objectives:

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

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

Qualifying Features:

S4056. Anisus vorticulus; Little whorlpool ram's-horn snail

[5] JNCC. 2008. Information Sheet on Ramsar Wetlands. South West London Waterbodies https://jncc.gov.uk/jncc-assets/RIS/UK11065.pdf [Date Accessed: 10/10/20].

[6] Natural England (2018) Arun Valley SAC Conservation Objectives. Available at: http://publications.naturalengland.org.uk/file/6136148019904512 [Date Accessed: 10/09/20]

Arun Valley SPA[7]

Conservation objectives:

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

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

Qualifying Features:

A037 Cygnus columbianus bewickii; Bewick's swan (Non-breeding) Waterbird assemblage (including: Shoveler Anas clypeata, Teal Anas crecca, Wigeon Anas penelope, Bewick's Swan Cygnus columbianus bewickii).

Arun Valley Ramsar[8]

Ramsar sites do not have the Conservation Objectives in the same way as SPAs and SACs. Information regarding the designation of Ramsar sites is contained in INCC Ramsar Information Sheets. Ramsar Criteria are the criteria for identifying Wetlands of International Importance. The relevant criteria and ways in which this site meets the criteria are presented in the table below.

Ramsar Criterion	Justification for the application of each criterion
2	The site holds seven wetland invertebrate species listed in the British Red Data Book as threatened. One of these, Pseudamnicola confusa, is considered to be endangered. The site also supports four nationally rare and four nationally scarce plant species
3	In addition to the Red Data Book invertebrate and plant species, the ditches intersecting the site have a particularly diverse and rich flora. All five British duckweed Lemna species, all five water-cress Rorippa species, and all three British water milfoils (Myriophyllum species), all but one of the seven British water dropworts (Oenanthe species), and two-thirds of the British pondweeds (Potamogeton species) can be found on site.
5	Ramsar criterion 5 – Assemblages of international importance: Species with peak counts in winter: 13774 waterfowl (5 year peak mean 1998/99-2002/2003)

[7] Natural England (2019) Arun Valley SPA Conservation Objectives. Available at: http://publications.naturalengland.org.uk/file/5120675857825792 [Date Accessed: 10/09/20]

[8] JNCC. 2008. Information Sheet on Ramsar Wetlands. Arun Valley https://jncc.gov.uk/jncc-assets/RIS/UK11004.pdf [Date Accessed: 10/10/20].

6	Ramsar criterion 6 – Species/populations identified subsequent to designation for possible future consideration under criterion 6.

Species with peak counts in winter:	
Northern pintail , Anas acuta, NW Europe	641 individuals, representing an average of 1% of the population (5 year peak mean 1998/9- 2002/3)

The Mens SAC[9]

Conservation objectives:

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

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

Qualifying Features:

H9120. Atlantic acidophilous beech forests with Ilex and sometimes also Taxus in the shrublayer (Quercion robori-petraeae or Ilici-Fagenion); Beech forests on acid soils

S1308. Barbastella barbastellus; Barbastelle bat

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[9] Natural England (2018) The Mens SAC Conservation Objectives. Available at: http://publications.naturalengland.org.uk/file/4643646439948288 [Date Accessed: 08/12/20]

Appendix B: Site of Special Scientific Interest Condition Data

European Site	SSSI Name	No. of SSSI Units	Conservation Status of SSSI Units[1]	Reason for unfavourable status where applicable.
Ashdown Forest SAC and Ashdown Forest SPA	Ashdown Forest SSSI	127	36 Favourable	n/a
			90 Unfavourable - recovering	n/a
			1 Unfavourable – declining	Deer grazing / browsing. Forestry and woodland management. Lack of corrective works and inappropriate scrub control.
Mole Gap to Reigate Escarpment SAC	Mole Gap to Reigate Escarpment SSSI	37	23 Favourable	n/a
			13 Unfavourable - recovering	n/a
			1 Unfavourable – no change	Lack of corrective works – Inappropriate scrub control.
South West London Waterbodies SPA and Ramsar	Knight & Bessborough Reservoirs SSSI	1	1 Favourable	n/a
	Kempton Park Reservoirs SSSI	2	2 Unfavourable - recovering	Infestation of the invasive plant Crassula hemsii (New Zealand Pygmyweed) is thought to be having adverse affects on feeding conditions for Gadwall.
	Staines Moor SSSI	6	4 Favourable	n/a
			1 Unfavourable - recovering	Investigation into the source of the inflow is still required to check water quality.
			1 Unfavourable – declining	Agriculture – inappropriate cutting/mowing and undergrazing. Lack of corrective works – inappropriate weed control.

[1] Natural England. IRX https://designatedsites.naturalengland.org.uk/. Site condition data is provided for the SSSIs which legally underpin the European designation [Date Accessed: 05/10/20].

European Site	SSSI Name	No. of SSSI Units	Conservation Status of SSSI Units[1]	Reason for unfavourable status where applicable.
	Thorpe Park No.1 Gravel Pit SSSI	1	1 Favourable	n/a
	Wraysbury and Hythe End Gravel Pits SSSI	6	6 Favourable	n/a
	Wraysbury No.1 Gravel Pit SSSI	1	1 Favourable	n/a
	Wraysbury reservoir SSSI	1	1 Favourable	n/a
Arun Valley SAC	Amberley Wild Brooks SSSI	14	3 Favourable	n/a
			11 Unfavourable - recovering	n/a
	Pulborough Brooks SSSI	3	3 Favourable	n/a
Arun Valley SPA and Arun Valley Ramsar	Amberley Wild Brooks SSSI	14	3 Favourable	n/a
			11 Unfavourable - recovering	n/a
	Pulborough Brooks SSSI	3	3 Favourable	n/a
	Waltham Brooks SSSI	3	3 Unfavourable - recovering	n/a
The Mens SAC	The Mens SSSI	12	11 Favourable	n/a
			1 Unfavourable – declining	Appropriate woodland management needs to be agreed.

Appendix C: Threats and Pressures

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Table C.1: *Pressures and threats for European sites that may be affected by the Local Plan.*

		European sites				
		Ashdown Forest SPA and SAC[1]	Mole Gap to Reigate Escarpment SAC[2]	South West London Waterbodies SPA[3] and Ramsar[4]	Arun Valley SCI and SPA[5] and Ramsar[6]	The Mens SAC[7]
Data from SIPs and Ramsar Information Sheets	Change in land management	H4010 Wet heathland with cross-leaved heath H4030 European dry heaths	H6210 Dry grasslands and scrublands on chalk or limestone (important orchid site)			S1308 Barbastelle bat
	Air pollution	H4010 Wet heathland with cross-leaved heath H4030 European dry heaths	H4030 European dry heaths, H5110 Natural box scrub, H6210 Dry grasslands and scrublands on chalk or limestone (important orchid sites), H9130 Beech forests on neutral to rich soils, H91J0 Yew-dominated woodland, S1323 Bechstein`s bat			H9120 Beech forests on acid soils S1308 Barbastelle bat

[1] Natural England. 2014. Site Improvement Plan. Ashdown Forest SPA and SAC. http://publications.naturalengland.org.uk/file/6679502935556096. [Date Accessed: 14/09/20].
[2] Natural England. 2014. Site Improvement Plan. Mole Gap to Reigate Escarpment SAC. http://publications.naturalengland.org.uk/file/6256378880458752 [Date Accessed: 14/09/20].
[3] Natural England. 2014. Site Improvement Plan. South West London Waterbodies SPA. http://publications.naturalengland.org.uk/file/5135484288237568 [Date Accessed: 14/09/20].
[4] JNCC. 2008. Information Sheet on Ramsar Wetlands. South West London Waterbodies Ramsar. https://jncc.gov.uk/jncc-assets/RIS/UK11065.pdf Date Accessed: 14/09/20].
[5] Natural England. 2014. Site Improvement Plan. Arun Valley SCI and SPA. http://publications.naturalengland.org.uk/file/5185212862431232. [Date Accessed: 14/09/20].
[6] JNCC. 2008. Information Sheet on Ramsar Wetlands. Arun Ramsar. https://jncc.gov.uk/jncc-assets/RIS/UK11005.pdf Date Accessed: 14/09/20].
[7] Natural England. 2015. Site Improvement Plan. The Mens SAC. http://publications.naturalengland.org.uk/file/614469219647488 [Date Accessed: 08/12/20].

Public access / disturbance	A224(B) European nightjar A302(B) Dartford Warbler	H6210 Dry grasslands and scrublands on chalk or limestone (important orchid sites) S1166 Great crested newt, S1323 Bechstein`s bat	A051(NB) Gadwall, A056(NB) Shoveler		S1308 Barbastelle bat
Hydrological changes	H4010 Wet heathland with cross-leaved heath				
Disease		H5110 Natural box scrub			
Inappropriate scrub control		H6210 Dry grasslands and scrublands on chalk or limestone (important orchid site)			
Changes in species distributions			A051(NB) Gadwall A056(NB) Shoveler		
Invasive species			A051(NB) Gadwall A056(NB) Shoveler		
Natural changes to site conditions			A051(NB) Gadwall A056(NB) Shoveler		
Fisheries: fish stocking			A051(NB) Gadwall A056(NB) Shoveler		

	Inappropriate weed control			A051(NB) Gadwall A056(NB) Shoveler		
	Inappropriate water levels				A037(NB) Bewick's Swan, S4056 Little ramshorn whirlpool snail, Waterbird assemblage	
	Water pollution				A037(NB) Bewick's Swan, S4056 Little ramshorn whirlpool snail	
	Inappropriate ditch management				A037(NB) Bewick's Swan, S4056 Little ramshorn whirlpool snail	
	Water abstraction for Public Water Supply				Red Data Book invertebrate and plant species Waterfowl Northern pintail, *Anas acuta*	
	Forestry and Woodland Management					H9120 Beech forests on acid soils S1308 Barbastelle bat
	Habitat Connectivity					S1308 Barbastelle bat

Appendix D: In-Combination Assessment

Plans and Policies	Plan Status	Summary of housing/employment	HRA Output and Key Considerations
Reigate and Banstead Borough Council	The Reigate & Banstead, Development Plan consists of the following: • Core Strategy (adopted 2014 and reviewed 2019) • Development Management Plan (adopted 2019) • Policies Map	The Core Strategy includes provision of at least 460 dwellings per annum between 2012 and 2027. On 2 July 2019, the Council completed a review of all the 2014 Core Strategy policies, which concluded that the Core Strategy remains up to date, and that none of its policies currently need modifying or updating. The Development Management Plan (DMP) was adopted in September 2019. The DMP includes specific site allocations to deliver the level of growth and the spatial strategy set out in the Core Strategy. The Objectively Assessed Need is 9,000-9,600 over the plan period (2012-27), however the Housing Requirement in the adopted and reviewed Core Strategy is 6,900 due to constraints.	An HRA was undertaken alongside the development of both the Core Strategy and DMP. The HRA of the DMP screened in impacts in relation to traffic generated air quality in combination effects on Mole Gap and Reigate Escarpment SAC; Wimbledon Common SAC and Thames Basin Heaths SPA. Recreational and hydrology impacts were screened out following a review of recreational data and existing recreational resources, current management regimes and review of hydrological pathways. Air quality modelling was commissioned to support the HRA process. This concluded that there would be a net decrease in nitrogen deposition to SAC habitats along the modelled links, notwithstanding the precautionary assumptions made in the modelling concerning improvements in NO2 emission factors. Accordingly, growth to 2033 would not have a significant in- combination adverse effect on the integrity of the SAC by way of contributing to any net increase in nitrogen deposition. The AA analysed SSSI IRZ data which highlighted possible areas of Bechstein's Bat (Myotis bechsteinii) foraging habitat in the area surrounding the Mole Gap to Reigate Escarpment SAC as they were within the functional linkage for the protected species and therefore formed part of the core sustenance zone (CSZ)[1].

[1] Reigate and Banstead Borough Council. Development Management Plan: Main Modifications. HRA AA Addendum. March 2019.

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Plans and Policies	Plan Status	Summary of housing/employment	HRA Output and Key Considerations
		Employment Borough total of approximately 46,000 sqm is set out in the DMP.	
Mid Sussex District Council	Mid Sussex District Council adopted the Mid Sussex District Plan 2014-2031 28th March 2018.	The Local Plan aims to deliver 25 ha of employment land The District's Objectively Assessed Need (OAN) is 14,892 dwellings over the Plan period. Provision is also made of 1,498 dwellings to ensure unmet need is addressed in the Northern West Sussex Housing Market Area. There is a minimum District housing requirement of 16,390 dwellings between 2014 – 2031.	HRA was undertaken during the development of the Mid Sussex District Plan. The HRA of the Main Modifications version of the Plan focused on LSEs on Ashdown Forest SAC (in terms of air quality) and Ashdown Forest SPA (in terms of recreation impacts). The HRA included an assessment of traffic modelling (Mid Sussex Transport Study[2] which provides an in-combination assessment incorporating growth assumptions for surrounding local authority areas) and air quality modelling data. Predicted traffic flow changes as a result of development proposed by the District Plan, in combination with growth assumptions for surrounding local authority areas, ranged from an increase of 267 AADT on the A275 to decreases of -27, -197 and - 263 on the A22, A26 and B2110 respectively. Changes in nutrient nitrogen loads are predicted to range between 0.05kg N/ha/yr (0.5% of the minimum critical load) within dry heath habitat c.5m from the A275, and -0.01kg N/ha/yr (-0.1% of the minimum critical load) within wet heath habitat c.100m from the A26. The HRA concluded that these changes are unlikely to significantly alter the extent and distribution of qualifying natural habitats and are unlikely to affect the integrity of the Ashdown Forest SAC. The HRA considered recreational zones of influence (7km). The continued commitment of Mid Sussex to delivery of strategic level SANG and an interim SAMMS strategy to mitigate recreational impacts at Ashdown Forest SPA were considered. The HRA concluded that the Main Modifications to the District Plan will not result in adverse effects on the ecological integrity of the Ashdown Forest SPA. The District Plan was considered compliant with the Habitats Regulations in respect of both sites.
Horsham District Council	Horsham District Council are in the process of updating their local plan and undertook consultation on their Regulation	The standard methodology calculation for Horsham District is calculated as 965 dwellings per annum. This is equivalent to providing a	The Regulation 18 version of the Local Plan was accompanied by an HRA screening report[3]. This screened in the following European sites for further assessment in the HRA process: • Arun Valley Special Protection Area; • Arun Valley Special Area of Conservation;

[2] Amey (2017): Updated Mid Sussex Transport Study: Modelling Output (May 2017).

[3] Place Services. 2019. Horsham Local Plan. Habitats Regulations Assessment Screening Report.

Plans and Policies	Plan Status	Summary of housing/employment	HRA Output and Key Considerations
	18 Draft Local Plan between 17 February and 30 March 2020	minimum of 17,370 homes in the period between 2019 and 2036. The Local Plan may also look to accommodate unmet housing need in neighbouring authority areas.	• Ebernoe Common Special Area of Conservation; • The Mens Special Area of Conservation; and • Ashdown Forest Special Area of Conservation. The HRA will focus on recreation, air quality, noise and hydrology impacts. The HRA will be undertaken alongside development of the Local Plan.
Tandridge District Council	Tandridge District Council are in the process of preparing their local plan. The Local Plan will replace the Council's currently adopted Core Strategy (2008). The examination hearings were undertaken in November 2019. The inspector's preliminary conclusions and advice have been received. This identifies a number of soundness issues associated with the Plan. The Council are currently considering how to best take this forward.	The Regulation 22 Submission Version of the Local Plan sets out provisions for 6,056 homes within the Plan period to 2033. The Plan also provides for the delivery of at least 15.3ha of B-class employment space.	The HRA submitted in support of the submission version of the Local Plan[4] provided an appropriate assessment of LSEs on the following European sites: Ashdown Forest SPA and SAC - Recreational Disturbance - Air Quality Mole Gap to Reigate Escarpment SAC - Recreational Disturbance - Hydrology - Air Quality On the basis of a review of recreational survey data, availability of existing and proposed recreational resource and established zones of influence recreational no adverse impacts on site integrity were concluded. Hydrological links were investigated, and strong SUDS policies included within the Local Plan. Detailed air quality modelling was undertaken. A review of air quality data, trends and strong transport policies in the plan resulted in a conclusion of no adverse effect on site integrity. The HRA concluded no adverse effects on the integrity of any European site alone or in-combination.

[4] Tandridge District Council. Habitats Regulation Assessment for the Tandridge District Council Local Plan 2033 and Garden Community Appropriate Assessment Report. January 2019. Local Plan Submission.

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Plans and Policies	Plan Status	Summary of housing/employment	HRA Output and Key Considerations
Mole Valley District Council	Mole Valley District Council are currently in the process of reviewing their local plan. A Regulation 18 public consultation on the draft Future Mole Valley Local Plan took place between February and March 2020.	The Regulation 18 version of the Plan sets out a housing requirement for Mole Valley to deliver at least 6,735 additional homes within the 2018-2033 plan period (449 homes each year).	An HRA was prepared in support of this version of the Local Plan[5]. The HRA focused on the following European sites: • Mole Gap to Reigate Escarpment SAC; • Thames Basin Heaths SPA; • South-West London Water Bodies SPA / Ramsar; and • Richmond Park SAC. The following impact pathways were considered in the HRA: • Atmospheric pollution • Recreational pressure • Loss of functionally linked land • Water quality • Water quantity, level and flow Air quality modelling was undertaken which demonstrated no adverse impacts on any European sites. AECOM recommended a strengthening of transport policies and commitment to district wide initiatives to reinforce this conclusion and monitoring. A recommendation was made regarding strengthening of policy wording to ensure protection of bat functionally linked habitat. Policy wording was also suggested to ensure provision of SANG to mitigate recreational impacts. On the basis of these amendments it was concluded that the Local Plan would have no adverse effect on the integrity of any European site.
Brighton and Hove City Council	The City Plan Part One was adopted in March 2016. Public consultation on the City Plan	The City Plan Part One makes provision for at least 13,200 new homes to be built over the plan period 2010 – 2030	An HRA was undertaken in support of the City Plan Part One[6]. This focused on the following impacts: - Increased recreational pressure on green spaces and the countryside including the possibility of increased visits to the European sites.

[5] AECOM. 2019. Habitat Regulations Assessment of the Mole Valley Draft Local Plan.

[6] Brighton & Hove City Council. May 2012. Local Development Framework Draft Brighton & Hove City Plan Part 1. Appropriate Assessment.

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Plans and Policies	Plan Status	Summary of housing/employment	HRA Output and Key Considerations
	Part Two began in September 2020.	(this equates to an annual average rate of provision of 660 dwellings).	- Increased traffic, leading to increased air pollution, which could affect species that are sensitive to air quality. - Increased resource use, including minerals, water and fuel. Increased water abstraction could affect water levels at the European sites. It focused on impacts at the following European sites: - Arun Valley SAC; - Ashdown Forest SPA and SAC; - Lewes Downs SAC; and - Castle Hill SAC. The HRA concluded no adverse effect on any European site alone or in-combination.
Lewes District Council	Lewes Core Strategy Local Plan Part 1 was adopted in May 2016. The Local Plan Part 2 allocates land for housing, including Gypsy and traveller pitches, and employment. It also sets out detailed planning policies to guide development and change in the period to 2030. The Local Plan Part 2 was adopted in February 2020	The Core Strategy now plans for at least 6,900 new dwellings between 2015 and 2030. In the period between 2012 and 2031, in the region of 74,000 square metres of employment floorspace (B1, B2 and B8) will be provided in the plan area. Local Plan Part 2 applies only to the area of the district outside the South Downs National Park (National Park) and the housing requirement reflects this. Of the overall total, a residual figure of 1,660 net additional	HRA was undertaken alongside development of the Core Strategy – Local Plan Part 1. The HRA accompanying the submission version of the Core Strategy[7] focused on the following protected sites: - Lewes Downs - Special Area of Conservation (SAC) - Castle Hill - SAC - Ashdown Forest - SAC and Special Protection Area (SPA) - Pevensey Levels - Ramsar site and Candidate SAC. Following the adoption of mitigation measures (specifically to address impacts at Ashdown Forest SPA/SAC) this report concluded that the Core Strategy would not have significant effect on any European site. In 2015 an HRA addendum[8] was prepared in support of the Core Strategy. This focused on air quality impacts on the Lewes Downs SAC specifically and concluded that based on the vehicle flow data provided by East Sussex County Council it can be concluded that the contribution of Local Plan traffic to changes in NOx concentration and nitrogen deposition rate within 200m of the Lewes Downs SAC would be sufficiently small that a conclusion of no likely significant effect on the SAC alone or in combination can be drawn.

[7] Lewes District Council & The South Downs National Park Authority. 2013. Lewes District Core Strategy: Proposed Submission Stage (Regulation 20) Habitat Regulations Assessment Report (Stages 1 – 3).

[8] Lewes District Council. 2015. Habitat Regulations Assessment Addendum July 2015. Air Quality impacts of the Core Strategy Main Modifications. On the Lewes Downs SAC.

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Plans and Policies	Plan Status	Summary of housing/employment	HRA Output and Key Considerations
		dwellings forms the basis for the housing allocations identified within the Local Plan Part 2 and neighbourhood plans.	Following the Wealden Judgement, in 2017 AECOM undertook an air quality impact assessment for Lewes District Council and South Downs National Park Authority, which modelled forecast traffic growth on key roads within 200m of Ashdown Forest SAC over the period 2017 to 2033, including that expected due to the quantum and distribution of growth in the adopted Lewes Joint Core Strategy (as it relates to Lewes District outside the South Downs National Park) and the South Downs Local Plan[9]. Tunbridge Wells Borough Council commissioned AECOM to use the same traffic and air quality models to undertake an identical analysis for the emerging Tunbridge Wells Local Plan. Sevenoaks District Council also commissioned an analysis. Based on the outputs of the air quality modelling and a review of dose-response relationships, this work concluded that air quality impacts would not be significant in-combination. An HRA was undertaken of Lewes District Council's Local Plan Part 2 (LPP2) and Neighbourhood Plans, which allocate specific sites suitable for development in order to meet the Joint Core Strategy requirements for quantum of housing and employment to the end of the Plan period (2030)[10]. This had a particular focus on recreational impacts at Ashdown Forest SAC/SPA. It concluded that there will be no adverse effects on the integrity of any European sites due to growth in Local Plan Part 2, either alone or in combination with other plans and projects.
Eastbourne Borough Council	Eastbourne are currently undertaking a Local Plan review. Consultation has been undertaken on the first stage: Issues and Options.	The Issues and Options document consults on a number of options for housing delivery in Eastbourne.	This document was accompanied by an HRA screening report[11]. It concluded that the following European sites and impact pathways will be taken forward to the Appropriate Assessment stage of HRA when developing the policies of the new Eastbourne Local Plan 2018-2038: • Ashdown Forest SAC – air quality impact pathway; • Pevensey Levels SAC – water quality impact pathway; and • Lewes Downs SAC – air quality impact pathway.

[9] AECOM. 2017. South Downs National Park Authority Local Plan/Lewes Joint Core Strategy Habitats Regulations Assessment Addendum. Traffic-Related Effects on Ashdown Forest SAC.

[10] AECOM. 2018. Lewes Local Plan Part 2 & Neighbourhood Plans. Habitats Regulation Assessment.

[11] Eastbourne Borough Council. Eastbourne Borough Council Local Plan. Habitat Regulations Assessment. Screening Report October 2019

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Plans and Policies	Plan Status	Summary of housing/employment	HRA Output and Key Considerations
Rother District Council	The Core Strategy was adopted in 2014. The Core Strategy does not allocate specific sites for development. Development policies and site allocation policies have been adopted in a separate document called the Development and Site Allocations (DaSA) Local Plan which was adopted in 2019.	The Core Strategy aims to plan for at least 5,700 dwellings (net) in the district over the period 2011-2028 and for at least 100,000 square metres of gross additional business floorspace.	In 2018 AECOM undertook the Habitat Regulations Assessment (HRA) of the Rother Development and Site Allocations Plan (DaSA)[12]. This assessment focused on the following European sites: - Pevensey Levels SAC; - Pevensey Levels Ramsar site; - Dungeness, Romney Marsh and Rye Bay SPA (including the marine SPA extension); - Dungeness, Romney Marsh and Rye Bay Ramsar; - Dungeness SAC; - Hastings Cliffs SAC; - Ashdown Forest SAC; - Ashdown Forest SPA; and - Lewes Downs SAC. The HRA concluded that an adequate mitigation strategy for both the proposed development sites and development policies will be in place to ensure that there will be no adverse effects on the integrity of the Pevensey Levels SAC/Ramsar and Dungeness Romney Marsh and Rye Bay SPA/Ramsar. In 2019 a Main Modifications HRA was prepared by AECOM in support of the DaSA Local Plan[13]. This concluded that they will not lead to likely significant effects on European sites and do not undermine the conclusions of the HRA of the submitted DaSA.
Sevenoaks District Council	Sevenoaks are in the process of updating the local plan. Following hearing sessions in September and October 2019, the Planning Inspector issued the final report in March 2020 in relation to the Plans	10,568 dwellings over the plan period.	An HRA was prepared alongside the Plan[14]. This HRA focused LSEs associated with an increase in atmospheric pollution from an increase in traffic flow and an increased recreational pressure at Ashdown Forest SAC and SPA. Following an Appropriate Assessment which focused on an assessment of traffic, air quality and recreational survey data and zones of influences, the HRA concluded there would be no adverse effects upon the integrity of Ashdown Forest SAC and SPA as a result of the Sevenoaks District Local Plan.

[12] AECOM. 2018. Habitat Regulations Assessment: Rother District Council Likely Significant Effects and Appropriate Assessment

[13] AECOM. 2019. Habitat Regulations Assessment. Addendum Rother Development and Site Allocations Plan. Main Modifications Rother District Council

[14] AECOM. 2019. Habitats Regulations Assessment of the Sevenoaks District Local Plan 2015-2035. Sevenoaks District Council

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Plans and Policies	Plan Status	Summary of housing/employment	HRA Output and Key Considerations
	examination. This was found not legally compliant in respect of the Duty to Co-operate (DtC). The Council lodged an application to appeal against an unsuccessful Judicial Review in December 2020.		
South Downs National Park	The South Downs Local Plan was adopted in 2019.	4,750 net additional homes over a 19 year period between 2014 and 2033	HRA was undertaken alongside the preparation of the South Downs Local Plan. In 2018 AECOM prepared an HRA of the pre-submission version of the Local Plan[15]. Air Quality assessment work was undertaken to support this HRA. The HRA focused on the following pathways of impact: - Air quality; - Recreation; - Hydrology; - Loss of functionally-linked land; - Urbanisation; and - Renewable energy development. The HRA made no recommendations made for further changes to the plan itself. However, a number of recommendations were made for initiatives to be taken forward either strategically or via more detailed project-level HRA for individual planning applications to ensure no adverse effects on the integrity of any European site.
Tunbridge Wells Borough Council	Tunbridge Wells Borough Council is in the process of updating its local plan. Consultation on the Draft Local Plan took place between 20 September and 15 November 2019.		An HRA was undertaken in support of the Draft Local Plan by AECOM in 2019[16]. This HRA focuses on the following European sites: - Ashdown Forest SAC; and - Ashdown Forest SPA. The following impact pathways were considered: - Increase in atmospheric pollution from an increase in traffic flow; and

[15] AECOM. 2018. South Downs National Park Authority Local Plan2014-2033 (April 2018) Habitats Regulations Assessment

[16] AECOM. 2019. Habitat Regulations Assessment of the Regulation 18 Tunbridge Wells Local Plan.

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Plans and Policies	Plan Status	Summary of housing/employment	HRA Output and Key Considerations
			- Increased recreational pressure. This assessment drew on traffic and air quality modelling data. Overall it concluded that the Local Plan would not result in an adverse effect on the integrity of the Ashdown Forest SPA / SAC through recreational pressure / disturbance either alone or 'in- combination' with other Local Plans.
Wealden District Council	The Council's current statutory development plan consists of the adopted Wealden District Core Strategy Local Plan (February, 2013), the 'saved' policies of the adopted Wealden Local Plan (1998) and the Affordable Housing Delivery Local Plan (May, 2016). Wealden District Council has worked on the Strategic Sites Local Plan and the Wealden Local Plan that both reached the Examination in Public (EiP) stage of the plan-making process but were later withdrawn by the Council on 27 May 2015 and on 19 February 2020 respectively. The Council is currently preparing a new Local Plan that will incorporate a full review of the existing planning policies within Wealden District.	Housing numbers set out in the Core Strategy are out of date. The standard methodology provides a minimum figure for Wealden District to deliver of 1,231 dwellings per annum (this is the 2019/20 figure and due to be updated by MHCLG – though not expected to change significantly).	HRA work was undertaken to accompany the Strategic Sites Local Plan and the Wealden Local Plan. This work was extensive and included air quality, visitor survey and ecological work focusing specifically on Ashdown Forest SAC and SPA[17]. In terms of the HRA the planning inspector noted that her "central concern was in respect of the legal compliance of the plan relates to the lack of constructive engagement with neighbouring authorities and Natural England in respect of impacts on habitats and landscape and in respect of the issue of unmet housing need in Eastbourne." "against the advice of Natural England – on an emissions model which did not allow for emission improvements over time, a position which was "in scientific terms lacking credibility" She added there were other examples of "inadequate engagement" with Natural England and she raised concern about the way the council approached cross-boundary issues with other authorities. The inspector said the council held significant amounts of data which could potentially be of use to other local planning authorities to support work on strategic the cross-boundary matter of air quality, with particular reference to impacts on the Ashdown Forest. But, she said, the council did not share the information on a constructive basis with all its fellow members of the Ashdown Forest Working Group (AFWG).

[17] Wealden District Council. Planning Evidence Base. HRA. https://www.wealden.gov.uk/planning-and-building-control/planning-policy/planning-policy-evidence-base/habitat-regulations-assessment/

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Plans and Policies	Plan Status	Summary of housing/employment	HRA Output and Key Considerations
			In addition, a session, to discuss mitigation measures to offset alleged impacts on the atmospheric pollution of two Special Areas of Conservation, Lewes Downs, and Pevensey Levels, was held too late for the local planning authorities to undertake meaningful engagement as policies had already been drafted.
Epsom and Ewell District Council	Epsom and Ewell District Council are currently reviewing their local plan. Their draft Local Plan is due for consultation soon.	The Draft version of the Local Plan identifies the quantum of development required over the Plan period, making provision for 579 dwellings per annum, new industrial and retail floorspace and school provision. This includes approximately 11,580 residential units by 2037. This includes 4,600 - 4,700 units on strategic greenfield sites.	The following European sites have been screened in as they were identified as having an LSE and will be explored again at Regulation 19: - Mole Gap to Reigate Escarpment SAC screened in for air quality, and public access; - Thames Basin Heaths SPA screened in for air quality; - Wimbledon Common SAC screened in for air quality and hydrology; and - South West London Waterbodies SPA and Ramsar screened in for air quality.
Chichester District Council	Chichester District Council Local Plan review. Issues and Options complete. Preferred approach underway. The Preferred Approach version of the Chichester Local Plan Review was published for consultation from 13 December 2018 to 7 February 2019.	The housing target for the Plan Area is to provide for at least 12,350 dwellings to be delivered in the period 2016-2035. Provisions will be made for a net additional 145,835 sqm of new floorspace for uses in the B Use Classes (B1,B2 and B8. For the period up to 2026 provision will be made for 9,500 sq.m (gross) of comparison retail floorspace	An HRA was undertaken by AECOM to support the Local Plan review[18]. This identified a number of policy recommendation to ensure no adverse impacts on any European site alone or in-combination. These related to recreational pressure, loss of functionally linked supporting habitat for birds and water quality at the Chichester and Langstone Harbour European sites and Pagham Harbour European sites. It also identified the requirement for further air quality modelling to assess air quality impacts at Butser Hill SAC, Ebernoe Common SAC and The Mens SAC.

[18] AECOM. 2018. Habitats Regulations Assessment Chichester Local Plan Review. Available at: http://www.chichester.gov.uk/CHttpHandler.ashx?id=30918

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Plans and Policies	Plan Status	Summary of housing/employment	HRA Output and Key Considerations
		at Chichester city, through provision at Southern Gateway and other opportunity sites, taking account of the sequential test.	
Arun District Council Local Plan	The Arun Local Plan was adopted in July 2018.	The Local Plan sets out provisions for the delivery of 20,000 new homes over the plan period (2011 – 2031).	An HRA was prepared in support of the Local Plan[19]. This screened out all sites except for Pagham Harbour SPA/Ramsar as being unlikely to be significantly affected by development within the district associated with the Local Plan. The HRA report there focused on Pagham Harbour SPA/Ramsar only. Following consideration of avoidance and mitigation measures the HRA concludes that there would be no adverse effect on the integrity of the SPA or Ramsar.
Waverley Borough Council Local Plan	Local Plan Part 1: Strategic Policies and Sites was adopted in February 2018. Local Plan Part 2: Site Allocations and Development Management Policies is currently in preparation.	Local Plan Part 1: Strategic Policies and Sites was adopted in 2018 and contains strategic sites along with an allocation for 11,210 net additional dwellings which will be delivered within each parish over the plan period	An HRA was prepared in support of Local Plan Part 2 by AECOM in 2020[20]. This built on the findings of the Local Plan Part 1 HRA[21]. This screened in a number of allocations for further assessment for LSEs on the following European sites: - Thames Basin Heaths SPA; - Wealden Heaths SPA; - Thursley, Ash, Pirbright & Chobham SAC; - Ockley Bogs Ramsar site

[19] UE Associates. 2013. Habitats Regulations Assessment for the Arun Local Plan.

[20] AECOM. 2020. Habitats Regulations Assessment Waverley Borough Council Local Plan Part 2. Available at: https://www.waverley.gov.uk/Portals/0/Documents/services/planning-and-building/planning-strategies-and-policies/local-plan/Habitats_Regulations_Assessment__HRA____Regulation_19__2020_.pdf?ver=euG08idDvkpYsGRJz6tyiw%3d%3

[21] AECOM. 2017. Habitats Regulations Assessment. Waverley Borough Council Local Plan Part 1: Strategic Policies and Sites: Additional Housing Habitats Regulations Assessment Addendum.

Plans and Policies	Plan Status	Summary of housing/employment	HRA Output and Key Considerations
		(2013-2032). Allocations to deliver these houses will be in either Local Plan Part 2: Site Allocations and Development Management Policies (currently at Regulation 19 consultation) or neighbourhood plans.	The HRA report focused on urbanisation and recreational pressure impacts. It concluded, taking into consideration the impact of policies, that there would be no adverse effect on the integrity of any European site alone or in-combination.
South Downs National Park Authority Local Plan and Policies Map	South Downs Local Plan was adopted in 2019.	The Local Plan will deliver 4,750 over the plan period.	An HRA was prepared in support of the SDNP Local Plan[22]. This included an appropriate assessment of a number of European sites with a focus on air quality, hydrology, loss of functionally linked land, urbanisation and renewable energy development impacts. This assessment made no recommendations made for further changes to the plan itself. However, a number of recommendations were made for initiatives to be taken forward either strategically or via more detailed project-level HRA for individual planning applications.
West Sussex Joint Minerals Local Plan	West Sussex Joint Minerals Local Plan was formally adopted in 2018.	This plan identifies minerals extraction and safeguarding areas across the County. It also contains a series of development management policies.	An HRA was undertaken in support of the Joint Minerals Plan in 2016[23]. This screened out all sites when considered alone. However, one site was screened in for in combination effects with other sites, projects and plans - East of West Heath Common. This was due to possible air quality impacts on the Wealden Heaths Phase 2 SPA or Woolmer Forest SAC. Neither European sites is considered in the Crawley Borough Council HRA.
West Sussex Waste Local Plan	West Sussex Waste Local Plan. Formally was adopted in April 2014.	This plan identifies waste allocation sites across the County. It also contains a	An HRA was undertaken in support of the Waste Local Plan in 2012[24]. This provided an assessment of waste sites upon European sites from atmospheric emissions, water quality

[22] AECOM. 2016. West Sussex Joint Minerals Local Plan Habitats Regulations Assessment.

[23] AECOM. 2018. South Downs National Park Authority Local Plan Habitats Regulations Assessment.

[24] URA. 2012. West Sussex Waste Local Plan. Habitats Regulations Assessment.

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Plans and Policies	Plan Status	Summary of housing/employment	HRA Output and Key Considerations
		series of development management policies.	and flows, predation from gulls and corvids, disturbance, direct land take and coastal squeeze. It focused on the following European sites: - Ebernoe Common SAC; - The Mens SAC; - Solent Maritime SAC; - Chichester and Langstone Harbours SPA/Ramsar; - Pagham Harbour SPA/Ramsar; - Singleton and Cocking Tunnels SAC; and - Arun Valley SPA/Ramsar. The HRA made recommendations in terms of strengthening of policy wording. On the basis of this it concluded that an adequate policy framework is in place to enable a conclusion of 'no likely significant effect alone or in combination' to be drawn regarding the Waste Local Plan.
West Sussex Transport Plan 2011-26 (LTP3)	The West Sussex Transport Plan 2011-26 (LTP3) sets the strategy for guiding future investment in highways and transport infrastructure.	The Plan includes four strategies that guide our approach to maintaining, managing and investing in transport and for meeting our main objective of improving the quality of life for West Sussex residents: 1. promoting economic growth 2. tackling climate change 3. providing access to services, employment and housing	The HRA for LTP3 is not publicly available, however the following provides information on the HRA as presented in the Sustainability Appraisal[25]. The HRA provided a summary of the international sites that could potentially be affected by LTP3 and ways in which they could be affected. Potential impacts from LTP3 were identified to be: • Air pollution effects, including dust; • Habitat loss, fragmentation and degradation; • Water quality and flows, including runoff; • Noise from either road construction or operational use; and • Recreation effects The initial stages of the HRA screening assessment were used to inform the policies in LTP3. The HRA screening assessment concluded that LTP3 is unlikely to have any significant negative impacts on any European Sites. However, it recognised that LTP3 is a

[25] West Sussex County Council. February 2011. West Sussex Transport Plan. Sustainability Appraisal 2011 – 2026.

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Plans and Policies	Plan Status	Summary of housing/employment	HRA Output and Key Considerations
		4. improving safety, security and health.	high-level strategy, and in some circumstances a lower tier assessment would be more appropriate in assessing potential effects on European Sites.
SES Water – Revised Draft Water Resources Management Plan 2019[26]	Published	Sutton and East Surrey Water (SES) have prepared a WRMP which sets out how they will secure water supplies from 2020 to 2080. During the next five years to 2025 SES Water will continue to implement demand management initiatives to achieve further leakage and water efficiency savings.	An HRA for SES WRMP is not publicly available, and as a result has not informed this HRA report. A review of key information has been undertaken as part of the WCS[27] and is summarised here in support of the HRA: - For the purposes of water resource planning, the SESW supply area has been divided into 2 Water Resource Zones (WRZ). - Currently, SESW supply 707,000 consumers in over 286,000 properties. At present, 85% of the water supplied is being extracted from groundwater resources and 15% from Bough Beech Reservoir, supplied by a pumped river abstraction from the River Eden in Kent. - The total number of households is expected to increase from 263,000 to 447,000, a 64% increase over the 60-year plan period. - There is a forecast surplus until 2048/49 and after this point there is a deficit. By the end of the plan period, there is a projected deficit of 22.7 Ml/d. - SESW has considered options that could resolve the supply-demand deficit. These options explore enhancing supplies or reducing demand separately. - Supply-Side Options: o Abstraction at new or existing sites, and those where new or additional treatment would result in an increase in yield o Water treatment options o Pipeline transfer and bulk supplies - Demand-Side Options: o Leakage management and reduction o Improved household and non-household water efficiency o Tariffs for sprinkler use or increasing volumetric charges

[26] Sutton and East Surrey Water Draft Water Resources Management Plan (2019) Available at: https://www.waterplc.com/userfiles/file/SES-Revised-Draft-WRMP19.pdf [Date Accessed: 14/09/20]

[27] JBA Consulting (August 2020). Gatwick Sub-Region Water Cycle Study. Final Report.

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Plans and Policies	Plan Status	Summary of housing/employment	HRA Output and Key Considerations
			○ Metering and smart metering ○ Rainwater harvesting or greywater recycling. - A preferred programme of fourteen demand and supply options, plus a strategic transfer to South East Water, was taken forward for public consultation. - SESW model outputs show that the identified demand management measures are sufficient to solve the deficit in the baseline supply-demand. The plan, at a cost of £170.2M, results in a surplus of over 7 Ml/d under average conditions by 2080.
Southern Water – Water Resource Management Plan 2020[28]	Published.	Southern Water Propose a range of interventions including leakage reductions, significant demand management and new resource developments, and water trading across its Eastern, Central and Western areas of supply. The need for these is due to a combination of changes to abstraction licences, increasing demand, the effects of climate change, and expected further reductions in the water available for use from existing sources as a result of licence changes to protect and enhance the environment. The most significant driver for the	A review of key information has been undertaken as part of the WCS[29] and is summarised here in support of the HRA: - Southern Water is responsible for supplying the entirety of Horsham and most of Crawley. A small portion of southern Mid Sussex is also supplied by Southern Water. - For the purposes of water resource planning, the Southern Water supply area is divided into fourteen WRZs. These fourteen WRZs have been amalgamated into three larger sub-regional supply areas. - The Gatwick Sub-Region is covered by the Sussex North WRZ and Sussex Brighton WRZ, two of three WRZs forming the Central supply area. - Southern Water is mainly dependant on groundwater sources in the chalk aquifer, and this makes up 70% of the total water supply. River abstraction accounts for 23% of water supply. Four surface water impounding reservoirs provide the remaining 7% water supply in the Southern Water supply area. - Southern Water anticipate that in the Central Area, the supply demand balance would move into deficit early in the planning period, with a further decrease anticipated as a result of potential sustainability reductions in 2027-28. - Southern Water have assessed a range of options to both increase water supply and reduce water demand. - The following schemes are included within the strategy for the Central supply area:

[28] Southern Water. Water Resource Management Plan 2020: Technical Overview

[29] Ibid.

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Plans and Policies	Plan Status	Summary of housing/employment	HRA Output and Key Considerations
		proposed strategies in the WRMP is licence changes.	○ Extend universal metering programme and enhance meter reading frequency. ○ Encourage the more efficient use of water ○ Increased leakage reduction activity ○ An indirect water reuse scheme from Littlehampton WwTW ○ A desalination scheme on the tidal River Arun ○ A coastal desalination scheme at Shoreham ○ An indirect water reuse scheme from Brighton WwTW, working jointly with South East Water ○ An aquifer storage and recovery scheme north of Worthing ○ Rehabilitation and enhancement of three existing sources in Sussex North ○ Implement planned infrastructure development to allow the existing Sussex Worthing to Sussex Brighton main to be enhanced. ○ Catchment management and infrastructure solutions to reduce nitrates and pesticides and increase resilience - Target 100 - Southern Water have committed in their WRMP to water efficiency policy that aims to achieve a per capita consumption (PCC) of 100 l/p/d by 2040. This consists of four key strands: ○ Installation of smart metering technology ○ Home audits ○ Proactive customer contact – this includes a system to engage with customers where significant increases in consumption are identified ○ Incentivising water efficiency behaviour An HRA was undertaken alongside the development of this Plan[30]. This concluded that as individual schemes are taken forward for further detailed design, the finer details of the required mitigation measures will need to be developed in dialogue with Natural England and the site operators/owners and secured during the project-stage HRA when a detailed design and construction method statement will be developed. "Assuming the mitigation measures described in the Appropriate Assessments are implemented, then it can be reasonably concluded that the WRMP19 schemes will not have an adverse effect on the integrity of any SACs, SPAs and Ramsar sites. The HRA Stage 1

[30] Southern Water. 2019. Water Resources Management Plan 2019 Annex 15: Habitats Regulations Assessment Main Report.

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Plans and Policies	Plan Status	Summary of housing/employment	HRA Output and Key Considerations
			Screening assessment for the remaining options included within this plan, both individually and in combination, confirmed that there would be no likely significant adverse effects on any European site".
South East Water – Water Resources Management Plan 2020 to 2080[31]	Draft water plan to replace WRMP14 out for consultation.	The draft water resources management plan (dWRMP19) sets out how SEW plan to secure water supplies from 2020 to 2080. The long-term forecast shows there is insufficient water available to meet demand, and therefore there is a risk of not meeting supply. Therefore, the WRMP sets out a range of demand management measures and new water supply options that could meet that shortfall in available water.	A review of key information has been undertaken as part of the WCS[32] and is summarised here in support of the HRA: - For the purposes of water resource planning, the South East Water supply area is divided into eight Water Resource Zones. - The Gatwick Sub-Region study area is covered by the Haywards Heath WRZ. - The SEW WRMP75 states that 73% of the supply comes from groundwater sources from more than 250 boreholes and wells, 19% is from surface water abstractions, including six river intakes, three surface water reservoirs and 8% from neighbouring water companies. - Across the entirety of the supply area, a deficit is reached at 2044/45 for both dry year annual average and summer peak period. - South East Water has defined a preferred plan to address the future deficit of water supply. This plan includes: o Adopting a mix of demand management and supply side options o Addressing deficits in both dry year annual average and summer peak period for all WRZs across the plan period An HRA[33] was undertaken in parallel to the development of the WRMP and found that none of the WRMP preferred plan options would result in significant effects on Natura 2000 sites and no further assessment is required.
Thames RBMP[34]	Published.	The RBMP provides a framework for protecting	An HRA was prepared alongside the development of the Thames RBMP[35]. This HRA identified potential hazards associated with implementation of the measures in the RBMP.

[31] South East Water. Water Resources Management Plan 2020 to 2080

[32] Ibid.

[33] South East Water. 2019. Water Resources Management Plan 2020 to 2080 Strategic Environment Assessment Environmental Report. Appendix A.

[34] Defra and Environment Agency. December 2016. Thames River Basin District – River Basin Management Plan

[35] Environment Agency. 2015. River basin management plan for the Thames River Basin District Habitats Regulations Assessment Updated December 2015

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Plans and Policies	Plan Status	Summary of housing/employment	HRA Output and Key Considerations
		and enhancing the benefits provided by the water environment.	These hazards were noted to be associated with the types of measures that are related to each significant water management issue in the RBMP and indicate the potential levels of risk to the range of features of the network of European sites. The level of detail of the RBMP did not allow detailed consideration of effects on individual European sites. However, at the strategic level of the RBMP, the assessment undertaken allowed confidence that the measures could go ahead without harm to European sites, subject to more detailed scrutiny of mitigation options at the lower tier plan or project level. This conclusion was primarily drawn because the RBMP does not constrain where or how the measures are implemented, and the process for deferring HRA to lower tier plan or project level, where necessary, will provide for a range of mitigation options to be pursued at the lower tier plan or project level. It therefore concluded that, at the strategic plan level, when taking into consideration the range of potential mitigation options available, the RBMP is not likely to have any significant effects on any European sites, alone or in combination with other plans or projects.
Gatwick Airport Northern Runway	Nationally significant infrastructure project. Consultation placed on hold.		The Gatwick Airport (GAL) Northern Runway is coming forward through a separate DCO process that is subject to examination as a nationally significant infrastructure project. The DCO has not yet been examined or determined. At the time of writing, and in light of the Covid pandemic, GAL has placed consultation on the DCO on hold. It is likely that the Gatwick Northern Runway would be a project with potentially serious effects (PPSE) as it would have the potential for a potentially serious effect on one or more European site alone. It is therefore likely that a PPSE will survive or fail the Integrity Test according to its effects alone. Given that the DCO has not been determined, the project has been placed on hold, and sufficient information is not available at the time of writing to allow a detailed in-combination assessment, it is considered reasonable to not consider the effect of this project in combination with the Local Plan. Were a DCO to eventually be consented (with a decision likely after adoption of our currently emerging Plan) then this project would need to be considered as part of a future plan review through an HRA in-combination assessment, should alone impacts be proven to be unlikely.
Crawley Borough Council	The SPD was adopted in October 2016	n/a	The Green Infrastructure (GI) SPD provides further guidance on the applications of Policy ENV4 Open Space, Sports and Recreation and Policy ENV5 Provision of Open Space and Recreational Facilities in the Local Plan 2015-2030.

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Plans and Policies	Plan Status	Summary of housing/employment	HRA Output and Key Considerations
Green Infrastructure SPD[36]			The SPD sets out requirements for the following: - The Green Infrastructure Network - Trees - Open Space - Biodiversity - Countryside and AONB GI is illustrated on a GI map. The SPD notes that details of green infrastructure should be provided with the planning application, for example, within the Design and Access Statement to demonstrate how green infrastructure has been addressed, cross-referring to any drawings. For large proposals, this is a requirement. When providing open space, the Green Infrastructure principles, should be applied to ensure that the greatest benefits for recreation and wildlife can be achieved.
Open Space Study[37]	Final version prepared to support Local Plan.	n/a	This study comprises an assessment of the quantity, accessibility, quality and value of open space in Crawley and Crawley's neighbourhoods. It concludes that Natural Green Space covers 296.62ha and accounts for 44.85% of Crawley's open space provision. Play Space (Youth) provision is the lowest at 0.88ha, which provides 0.13% of Crawley's open space. The total quantity of open space within Crawley equates to 8.3ha per 1000 population. In regard to quality, it notes that most sites fall into the Fair banding (43%). The least number of sites fall into the Excellent (3%) and Very Good (9%) quality banding. The value banding comprises High, Medium and Low and the majority of sites fell into the Low category (64%). Accessibility to open space is noted to be generally high but with notable gaps of provision for typologies such as Allotments and Play Space (Youth), particularly in the northern part of Crawley due to Gatwick Airport and Manor Royal Business District. The study recommends that an SPD should be published to outline the requirements of developers to:

[36] Crawley Borough Council. 2016. Green Infrastructure SPD. Supporting the Crawley Borough Local Plan 2015 – 2030.
[37] The Environment Partnership. December 2020. Open Space, Sport and Recreational Assessment.

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Plans and Policies	Plan Status	Summary of housing/employment	HRA Output and Key Considerations
			- protect, replace or enhance open spaces impacted by their proposals; and - review local open space provision in regard to the increase in population.
Draft New Directions for Crawley. Transport and access for the 21st Century.	Published in support of the Local Plan.	n/a	This document looks at some of the issues presented by the current approach to travel and access in Crawley, suggests what a vision for the future might be, outlines some options for improvement and shows what could be delivered in the town over the next five years. The strategy aims to meet the following aims: 1. Improved sustainable travel infrastructure – prioritise walking and cycling network improvements and facilities, improving public transport access and services. 2. Smarter highway network management – managing demand, directions, speeds and inefficient road space allocation to address congestion and improve access and health of neighbourhoods and business districts. 3. Integrated transport and land use planning – ensure housing and business development centres on public transport links and walking and cycling networks as 'Transit Oriented Development' for improved access. "An ageing population, vehicle and energy technology, disruptive digital technologies, and the need for climate change resilience and adaptation will all present uncertainty". 4. Effective travel planning – working with business and other organisations to improve commuter, visitor, shopping and leisure choices and reduce single-occupancy car use. 5. Shared mobility – develop facilities such as car clubs and shared bikes, with electric vehicle charging to broaden choices beyond conventional private car use. Alongside support for: 6. Digital travel tools – developing Mobility as a Service (MaaS) and transport information provision to enable seamless travel, awareness and use of public transport services as they develop.
Crawley Local Cycling and Walking Infrastructure Plan (LCWIP) 2020	Published in support of the Local Plan.	n/a	The Local Cycling and Walking Infrastructure Plan (LCWIP) is a costed plan which identifies and prioritises physical infrastructure improvements in a specified area to enable a significant increase in cycling and walking. It has informed the CBC Local Plan, guiding building development. It will provide a clear rationale for investment to make streets safe and attractive for active travel and for collaborative working with the local transport authority.

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Plans and Policies	Plan Status	Summary of housing/employment	HRA Output and Key Considerations
			This transformation in transport infrastructure and the resulting shift to cycling and walking will help deliver significant reductions in carbon emissions and improvements in air quality, local community health and quality of life.

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Appendix E: Policy Screening Summary

Table E.1: *Screening summary of the Crawley Local Plan policies*

Policy Number	Policy Name	Screening for LSE	Conclusion	Recommendations and further work
Sustainable Development				
SD1	Presumption in Favour of Sustainable Development	This policy sets out the Council's commitment to take a positive approach to sustainable development. The policy is positive in nature, does not trigger any development or change and can therefore be screened out under Category B.	Screened out.	
SD2	Enabling Healthy Lifestyles and Wellbeing	This policy sets out the Council's aspirations to support healthy lifestyles and promote wellbeing. The policy is positive in nature, does not trigger any development or change and can therefore be screened out under Category B.	Screened out.	
Character, Landscape and Development Form Policies				
CL1	Neighbourhood Principle	This policy sets out the Council's commitment to protect and enhance the neighbourhood principle. The policy is positive in nature, does not trigger any development or change and can therefore be screened out under Category B.	Screened out.	
CL2	Making Successful Places – Principles of Good Urban Design	This policy sets out the requirements for development to assist in the creation, retention and/or enhancement of successful places during design. It sets out a number of principles that development must meet through design. The policy is positive in nature, does not trigger any development or change and can therefore be screened out under Category F.	Screened out.	
CL3	Movement Patterns, Layout and Sustainable Urban Design	This policy sets out design principles to ensure sustainable patters of movement at new development can be achieved and sustainable methods of transport promoted. The policy is positive in nature, does not trigger any development or change and can therefore be screened out under Category F.	Screened out.	
CL4	Compact Development – Layout, Scale and Appearance	This policy sets out residential density requirements which must be met through design. The policy is positive in nature, does not trigger any	Screened out.	

Policy Number	Policy Name	Screening for LSE	Conclusion	Recommendations and further work
		development or change and can therefore be screened out under Category F.		
CL5	Development Briefs and Master Planning	This policy sets out the requirements for certain development applications to be supported by development briefs or masterplans and requirements for these. The policy is positive in nature, does not trigger any development or change and can therefore be screened out under Category F.	Screened out.	
CL6	Structural Landscaping	This policy sets out design requirements regarding landscaping (trees and soft landscaping). The policy is positive in nature, does not trigger any development or change and can therefore be screened out under Category F.	Screened out.	
CL7	Important and Valued Views	This policy sets out a number of important views which are identified in the Local Plan Map and the requirement for these to be protected and / or enhanced. The policy is positive in nature aiming to protect the natural environment, does not trigger any development or change and can therefore be screened out under Category D.	Screened out.	
CL8	Development Outside the Built-Up Area	This policy sets out requirements for development outside the built-up area. It sets out a series of criteria to ensure that the nature and attractive setting is maintained. The policy is positive in nature aiming to protect the natural environment, does not trigger any development or change and can therefore be screened out under Category D.	Screened out.	
CL9	High Weald Area of Outstanding Natural Beauty	This policy sets out requirements to ensure the natural beauty of the High Weald AONB is conserved and protected. The policy is positive in nature aiming to protect the natural environment, does not trigger any development or change and can therefore be screened out under Category D.	Screened out.	
Design and Development Requirements				
DD1	Normal Requirements of All New Development	This policy sets out a series of design requirements for new development. The policy is positive in nature, does not trigger any development or change and can therefore be screened out under Category F.	Screened out.	
DD2	Inclusive Design	This policy sets out access requirements to ensure inclusive design. The policy does not trigger any development or change and can therefore be screened out under Category F.	Screened out.	

Policy Number	Policy Name	Screening for LSE	Conclusion	Recommendations and further work
DD3	Standards for All New Dwellings (including conversions)	This policy sets out minim floorspace standards for all new dwellings and other requirements such as amenity space and space standards. The policy does not trigger any development or change and can therefore be screened out under Category F.	Screened out.	
DD4	Tree Replacement Standards	This policy sets out provisions for tree retention and provision for new development design. The policy is positive in nature, does not trigger any development or change and can therefore be screened out under Category F.	Screened out.	
DD5	Aerodrome Safeguarding	This sets out policy requirements for development design to ensure the continued safe operation of aerodromes. The policy does not trigger any development or change and can therefore be screened out under Category F.	Screened out.	
DD6	Advertisements	This policy sets out design requirements regarding advertisements. The policy does not trigger any development or change and can therefore be screened out under Category F.	Screened out.	
DD7	Crossovers	This policy sets out requirements regarding crossovers. The policy does not trigger any development or change and can therefore be screened out under Category F.	Screened out.	
Heritage Assets				
HA1	Heritage Assets	This policy sets out provision for the protection of heritage assets. The policy is positive in nature aiming to protect the historic environment, does not trigger any development or change and can therefore be screened out under Category D.	Screened out.	
HA2	Conservation Areas	This policy sets out provision for the protection of Conservation Areas. The policy is positive in nature aiming to protect the historic environment, does not trigger any development or change and can therefore be screened out under Category D.	Screened out.	
HA3	Areas of Special Local Character	This policy sets out provision for the protection of Areas of Special Landscape Character. The policy is positive in nature aiming to protect the historic and natural environment, does not trigger any development or change and can therefore be screened out under Category D.	Screened out.	
HA4	Listed Buildings and Structures	This policy sets out provision for the protection of Listed Buildings and Structures. The policy is positive in nature aiming to protect the historic	Screened out.	

Policy Number	Policy Name	Screening for LSE	Conclusion	Recommendations and further work
		environment, does not trigger any development or change and can therefore be screened out under Category D.		
HA5	Locally Listed Buildings	This policy sets out provision for the protection of Locally Listed Buildings. The policy is positive in nature aiming to protect the historic environment, does not trigger any development or change and can therefore be screened out under Category D.	Screened out.	
HA6	Historic Parks and Gardens	This policy sets out provision for the protection of Historic Parks and Gardens. The policy is positive in nature aiming to protect the historic environment, does not trigger any development or change and can therefore be screened out under Category D.	Screened out.	
HA7	Heritage Assets of Archaeological Interest	This policy sets out provision for the protection of Heritage Assets of Archaeological Interest. The policy is positive in nature aiming to protect the historic environment, does not trigger any development or change and can therefore be screened out under Category D.	Screened out.	
Open Space Sport and Recreation				
OS1	Open Space, Sport and Recreation	This policy sets out provisions to protect and ensure adequate provision of open space, sport and recreation space. The policy does not trigger any development or change and can therefore be screened out under Category F.	Screened out.	
OS2	Provision of Open Space and Recreational Facilities	This policy sets out provisions to protect and ensure adequate provision of open space and recreational facilities to meet future development needs. It promotes the application of NEs Natural Green Space Standard recommendations. The policy does not trigger any development or change and can therefore be screened out under Category F.	Screened out.	
OS3	Rights of Way and Access to the Countryside	This policy promotes the protection of Rights of Way and their character. The policy does not trigger any development or change and can therefore be screened out under Category F.	Screened out.	
Infrastructure Improvements				
IN1	Infrastructure Provision	This policy sets out the requirement for development to be supported by adequate infrastructure provision. The policy does not trigger any development or change and can therefore be screened out under Category F.	Screened out.	

Policy Number	Policy Name	Screening for LSE	Conclusion	Recommendations and further work
IN2	The Location and Provision of New Infrastructure	This policy sets out the requirements for new infrastructure applications. The policy does not trigger any development or change and can therefore be screened out under Category F.	Screened out.	
IN3	Supporting High Quality Communications	This policy sets out design requirements in terms of broadband provision. The policy does not trigger any development or change and can therefore be screened out under Category F.	Screened out.	
Economic Growth				
EC1	Sustainable Economic Growth	This policy sets out economic growth requirements in the Plan area over the Plan period. The impact of individual employment allocations alone will be screened for LSEs in Appendix F (screening of allocations). The cumulative impact of Local Plan employment growth has the potential to create LSEs in terms of changes to traffic flows (with impacts on air quality at European sites identified as being vulnerable to air pollution and within commuting zones) and hydrological changes (due to increased water demand and discharge of polluted water with LSEs on European sites which are vulnerable to changes in water quantity and quality). Possible LSEs in terms of air pollution (alone and in-combination) at the following European sites: - Ashdown Forest SAC; - Ashdown Forest SPA; and - Mole Gap to Reigate Escarpment SAC. LSE due to hydrological changes of the Local Plan alone have been screened in at: - Mole Gap to Reigate Escarpment SAC; and - Arun Valley SAC; - Arun Valley SPA; - Arun Valley Ramsar; and - The Mens SAC. This policy is screened in under Category I (hydrology and air quality) and Category L (air quality).	Screened in.	Detailed air quality modelling is currently underway to further define impacts associated with increased traffic movements. This will inform the HRA and Local Plan. Detailed work is also being undertaken to further assess water quality and water quantity impacts. In addition, engagement and consultation is currently being undertaken with relevant water companies, local authorities and Natural England. Modal shift and behavioural changes could be encouraged – with consideration given to car free options, 20-minute neighbourhoods and developing strong links with LTP3. It is noted that the Local Plan contains good sustainable transport policies ST1, ST2 and ST3. Employment allocations to be selected to reduce reliance on the car. Policy would benefit from water quality and water efficiency recommendations set out in WCS being incorporated into wording.

Policy Number	Policy Name	Screening for LSE	Conclusion	Recommendations and further work
EC2	Economic Growth in Main Employment Areas	This policy supports employment development in the Main Employment Areas. It also protects against a net loss of employment from these key areas. The policy does not in itself trigger any development or change and can therefore be screened out under Category F.	Screened out.	
EC3	Manor Royal	This policy sets out employment development restrictions and guidelines at Manor Royal. The policy does not in itself trigger any development or change and can therefore be screened out under Category F.	Screened out.	
EC4	Strategic Employment Provision	This policy sets out design requirements for employment land at Gatwick Green. The impact of this individual employment allocation is screened for LSEs in Appendix F (screening of allocations). The cumulative impact of Local Plan employment growth has the potential to create LSEs in terms of changes to traffic flows (with impacts on air quality at European sites identified as being vulnerable to air pollution and within commuting zones) and hydrological changes (due to increased water demand and discharge of polluted water with LSEs on European sites which are vulnerable to changes in water quantity and quality). Possible LSEs in terms of air pollution (alone and in-combination) at the following European sites: - Ashdown Forest SAC; - Ashdown Forest SPA; and - Mole Gap to Reigate Escarpment SAC. LSE due to hydrological changes of the Local Plan alone have been screened in at: - Mole Gap to Reigate Escarpment SAC; and - Arun Valley SAC; - Arun Valley SPA; - Arun Valley Ramsar; and - The Mens SAC. - The Mens SAC. This policy is screened in under Category I (hydrology and air quality) and Category L (air quality).	Screened in.	Detailed air quality modelling is currently underway to further define impacts associated with increased traffic movements. This will inform the HRA and Local Plan. Detailed work is also being undertaken to further assess water quality and water quantity impacts. In addition, engagement and consultation is currently being undertaken with relevant water companies, local authorities and Natural England. Modal shift and behavioural changes could be encouraged – with consideration given to car free options, 20-minute neighbourhoods and developing strong links with LTP3. It is noted that the Local Plan contains good sustainable transport policies ST1, ST2 and ST3. Employment allocations to be selected to reduce reliance on the car. Policy could be expanded to include measures for water efficiency, protection of water quality and any phasing of development that may be required to ensure adequate

Policy Number	Policy Name	Screening for LSE	Conclusion	Recommendations and further work
				upgrades are implemented at WwTWs. Policies would benefit from the inclusion of recommendations set out in WCS.
EC5	Employment and Skills Development	This policy sets out the requirement of new development to contribute to meeting the objectives of the most up-to-date Crawley Employment and Skills Programme. The policy does not in itself trigger any development or change and can therefore be screened out under Category F.	Screened out.	
EC6	High Quality Office Provision	This policy sets out requirements in terms of office provision. The policy does not in itself trigger any development or change and can therefore be screened out under Category F.	Screened out.	
EC7	Hotel and Visitor Accommodation	This policy sets out requirements in terms of hotel and visitor accommodation. The policy does not in itself trigger any development or change and can therefore be screened out under Category F.	Screened out.	
EC8	Evening and Night-time Economy	This policy sets out requirements in terms of the evening and night-time economy. The policy does not in itself trigger any development or change and can therefore be screened out under Category F.	Screened out.	
EC9	Supporting the Creative Industries	This policy sets out requirements in terms of the creative industries. The policy does not in itself trigger any development or change and can therefore be screened out under Category F.	Screened out.	
EC10	Flexible Temporary Cultural and Creative Uses	This policy sets out requirements in terms of the flexible temporary use for cultural and creative uses. The policy does not in itself trigger any development or change and can therefore be screened out under Category F.	Screened out.	
EC11	Employment Development and Residential Amenity	This policy sets out requirements to ensure that employment development does not detract from residential amenity. The policy does not in itself trigger any development or change and can therefore be screened out under Category F.	Screened out.	
EC12	Neighbourhood Centres	This policy sets out design requirements for the use of neighbourhood centres for employment space. The policy does not in itself trigger any development or change and can therefore be screened out under Category F.	Screened out.	
EC13	Rural Economy	This policy sets out requirements in terms of the development beyond the built-up area boundary. The policy does not in itself trigger any development or change and can therefore be screened out under Category F.	Screened out.	

Gatwick Airport				
GAT1	Development of the Airport with a Single Runway	This policy sets out the support of the Local Plan for the development of facilities which contribute to the sustainable growth of Gatwick Airport as a single runway, two terminal airport. It sets out a number of criteria. The policy does not in itself trigger any development or change and can therefore be screened out under Category F. This policy also references the potential development of Nationally Significant Projects at the airport which would be outside the scope of the Local Plan. The delivery of the Local Plan is not reliant on such development at the airport and therefore this policy can also be screened out under Category C.	Screened out.	
GAT2	Safeguarding Land	This policy safeguards land from development which may be used for expansion at the airport. The policy does not in itself trigger any development or change and can therefore be screened out under Category F.	Screened out.	
GAT3	Gatwick Airport Related Parking	This policy places restrictions on the provision of airport related parking. The policy does not in itself trigger any development or change and can therefore be screened out under Category F.	Screened out.	
GAT4	Employment Uses at Gatwick	This policy sets out requirements for changes in employment floorspace at the airport. The policy does not in itself trigger any development or change and can therefore be screened out under Category F.	Screened out.	
Crawley Town Centre				
TC1	Primary Shopping Area	This policy sets out guidelines for development within Primary Shopping Areas. The policy does not in itself trigger any development or change and can therefore be screened out under Category F.	Screened out.	
TC2	Town Centre Neighbourhood Facilities	This policy sets out requirements in terms of the provision of town centre provisions. The policy does not in itself trigger any development or change and can therefore be screened out under Category F.	Screened out.	
TC3	Town Centre Key Opportunity Sites	This policy allocates key sites for main town centre uses and mixed-use development. All allocations are screened individually in Appendix F. The cumulative impact of all Local Plan housing growth under this policy has the potential to create LSEs in terms of changes to traffic flows (with impacts on air quality at European sites identified as being vulnerable to air pollution and within commuting zones) and hydrological changes (due to increased water demand and discharge of polluted water with LSEs on European sites which are vulnerable to changes in water quantity and quality).	Screened in.	Detailed air quality modelling is currently underway to further define impacts associated with increased traffic movements. This will inform the HRA and Local Plan. Detailed work is also being undertaken to further assess water quality and water quantity impacts. In addition, engagement and

		Possible LSEs in terms of air pollution (alone and in-combination) at the following European sites: - Ashdown Forest SAC; - Ashdown Forest SPA; and - Mole Gap to Reigate Escarpment SAC. LSE due to hydrological changes of the Local Plan alone have been screened in at: - Mole Gap to Reigate Escarpment SAC; and - Arun Valley SAC; - Arun Valley SPA; - Arun Valley Ramsar; and - The Mens SAC. - The Mens SAC. This policy is screened in under Category I (hydrology and air quality) and Category L (air quality).		consultation is currently being undertaken with relevant water companies, local authorities and Natural England. Modal shift and behavioural changes could be encouraged – with consideration given to car free options, 20-minute neighbourhoods and developing strong links with LTP3. It is noted that the Local Plan contains good sustainable transport policies ST1, ST2 and ST3. Housing allocations to be selected to reduce reliance on the car. Policy could be expanded to include measures for water efficiency, protection of water quality and any phasing of development that may be required to ensure adequate upgrades are implemented at WwTWs. Policies would benefit from the inclusion of recommendations set out in WCS.
TC4	Active and Engaging Frontages	This policy sets out development requirements for frontages. The policy does not in itself trigger any development or change and can therefore be screened out under Category F.	Screened out.	
TC5	Town Centre First	This policy sets out the Council's strategy in terms of town centre and out of town development. The policy does not in itself trigger any development or change and can therefore be screened out under Category F.	Screened out.	
Housing				
H1	Housing Provision.	This policy sets out the housing provision requirement for the Plan area. The policy does not in itself trigger any development or change and can therefore be screened out under Category F.	Screened out.	
H2	Key Housing Sites	This policy allocates key sites to deliver the housing requirements set out in H1. All allocations are screened individually in Appendix F. The cumulative impact of all Local Plan housing growth under this policy has the potential to create LSEs in terms of changes to traffic flows (with impacts on air quality at European sites identified as being vulnerable to air pollution and within commuting zones) and hydrological changes (due to	Screened in.	Detailed air quality modelling is currently underway to further define impacts associated with increased traffic movements. This will inform the HRA and Local Plan.

		increased water demand and discharge of polluted water with LSEs on European sites which are vulnerable to changes in water quantity and quality). Possible LSEs in terms of air pollution (alone and in-combination) at the following European sites: - Ashdown Forest SAC; - Ashdown Forest SPA; and - Mole Gap to Reigate Escarpment SAC. LSE due to hydrological changes of the Local Plan alone have been screened in at: - Mole Gap to Reigate Escarpment SAC; and - Arun Valley SAC; - Arun Valley SPA; - Arun Valley Ramsar; and - The Mens SAC. - The Mens SAC. This policy is screened in under Category I (hydrology and air quality) and Category L (air quality).		Detailed work is also being undertaken to further assess water quality and water quantity impacts. In addition, engagement and consultation is currently being undertaken with relevant water companies, local authorities and Natural England. Modal shift and behavioural changes could be encouraged – with consideration given to car free options, 20-minute neighbourhoods and developing strong links with LTP3. It is noted that the Local Plan contains good sustainable transport policies ST1, ST2 and ST3. Housing allocations to be selected to reduce reliance on the car. Policy could be expanded to include measures for water efficiency, protection of water quality and any phasing of development that may be required to ensure adequate upgrades are implemented at WwTWs. Policies would benefit from the inclusion of recommendations set out in WCS.
H3	Housing Typologies	This policy sets out housing design requirements. The policy does not in itself trigger any development or change and can therefore be screened out under Category F.	Screened out.	
H3a	Estate Regeneration	This policy sets out housing design requirements. The policy does not in itself trigger any development or change and can therefore be screened out under Category F.	Screened out.	
H3b	Densification, Infill Opportunities and Small Sites	This policy sets out housing design requirements. The policy does not in itself trigger any development or change and can therefore be screened out under Category F.	Screened out.	
H3c	Town Centre Sites	This policy sets out housing design requirements. The policy does not in itself trigger any development or change and can therefore be screened out under Category F.	Screened out.	

H3d	Upward Extensions	This policy sets out housing design requirements. The policy does not in itself trigger any development or change and can therefore be screened out under Category F.	Screened out.	
H3e	Conversions from Commercial/Non-Residential Uses	This policy sets out housing design requirements. The policy does not in itself trigger any development or change and can therefore be screened out under Category F.	Screened out.	
H3f	Open Spaces	This policy sets out open space design requirements. The policy does not in itself trigger any development or change and can therefore be screened out under Category F.	Screened out.	
Housing Needs				
H4	Future Housing Mix	This policy sets out the requirements for the mix of housing to meet local housing needs. The policy does not in itself trigger any development or change and can therefore be screened out under Category F.	Screened out.	
H5	Affordable Housing	This policy sets out the requirements for the delivery of affordable housing in new development. The policy does not in itself trigger any development or change and can therefore be screened out under Category F.	Screened out.	
H6	Build to Rent	This policy sets out provisions for build to rent housing. The policy does not in itself trigger any development or change and can therefore be screened out under Category F.	Screened out.	
H7	Self and Custom Build	This policy sets out requirements for self and custom build housing. The policy does not in itself trigger any development or change and can therefore be screened out under Category F.	Screened out.	
H8	Gypsy, Traveller and Travelling Showpeople Sites	This policy allocates one reserve site for Gypsy and Traveller pitches for 10 pitches. It also sets out provisions for development of other sites for Gypsy and Travellers. The LSE of this allocation is assessed in Appendix F. The cumulative impact of all this allocation in-combination with other allocations (for housing and employment) has the potential to create LSEs in terms of changes to traffic flows (with impacts on air quality at European sites identified as being vulnerable to air pollution and within commuting zones) and hydrological changes (due to increased water demand and discharge of polluted water with LSEs on European sites which are vulnerable to changes in water quantity and quality). Possible LSEs in terms of air pollution (alone and in-combination) at the following European sites: - Ashdown Forest SAC; - Ashdown Forest SPA; and - Mole Gap to Reigate Escarpment SAC.	Screened in.	Detailed air quality modelling is currently underway to further define impacts associated with increased traffic movements. This will inform the HRA and Local Plan. Detailed work is also being undertaken to further assess water quality and water quantity impacts. In addition, engagement and consultation is currently being undertaken with relevant water companies, local authorities and Natural England. Policy could be enhanced by requirements in terms of

		LSE due to hydrological changes of the Local Plan alone have been screened in at: - Mole Gap to Reigate Escarpment SAC; and - Arun Valley SAC; - Arun Valley SPA; - Arun Valley Ramsar; and - The Mens SAC. - The Mens SAC. This policy is screened in under Category I (hydrology and air quality) and Category L (air quality).		maintaining surface water quality and appropriate phasing of pitch development to ensure adequate water supply / WwTW improvements are in place. Policies would benefit from the inclusion of recommendations set out in WCS.
H9	Houses in Multiple Occupation	This policy sets out requirements for houses in multiple occupation. The policy does not in itself trigger any development or change and can therefore be screened out under Category F.	Screened out.	
Green Infrastructure and Biodiversity				
GI1	Green Infrastructure	This policy sets out design requirements for green infrastructure. The policy is positive in nature aiming to protect the natural environment, does not trigger any development or change and can therefore be screened out under Category D.	Screened out.	
GI2	Biodiversity and Net Gain	This policy sets out design requirements for biodiversity and net gain. The policy is positive in nature aiming to protect the natural environment, does not trigger any development or change and can therefore be screened out under Category D.	Screened out.	
GI3	Biodiversity Sites	This policy sets out the hierarchy of biodiversity sites. The policy is positive in nature aiming to protect the natural environment, does not trigger any development or change and can therefore be screened out under Category D.	Screened out.	
GI4	Local Green Space	This policy sets out provisions to protect local green space. The policy is positive in nature aiming to protect the natural environment, does not trigger any development or change and can therefore be screened out under Category D.	Screened out.	
Sustainable Design and Construction				
SDC1	Sustainable Design and Construction	This policy sets out a series of requirements for all new development in terms of sustainable design and construction. The policy does not in itself	Screened out.	

		trigger any development or change and can therefore be screened out under Category F.		
SDC2	District Energy Networks	This policy encourages the development of district energy networks. The policy does not in itself trigger any development or change and can therefore be screened out under Category F.	Screened out.	
SDC3	Tackling Water Stress	This policy sets out requirements to achieve water efficiency. The policy is positive in nature aiming to protect the natural environment, does not trigger any development or change and can therefore be screened out under Category D.	Screened out.	Policy could be enhanced through the incorporation of the WCS recommendations in terms of managing water demand. A number of examples are extracted below. Continue to work with water suppliers to regularly review forecast and actual household growth across the supply region through the WRMP Annual Update reports. Yearly profiles of projected housing growth to water companies to inform the WRMP. Use planning policy to require all new development to achieve a water efficiency of 100l/person/day in the Gatwick sub-region (Policy SDC3) and 80l/p/d in strategic developments. The concept of water neutrality could be explored further with water companies and the Environment Agency. It has the potential to improve resilience to climate change and enable all waterbodies to achieve Good WFD status. Strategic residential developments, and commercial developments could consider incorporating greywater recycling and/or rainwater harvesting into development at the

				master planning stage in order to reduce water demand. Water companies should advise on strategic water resource infrastructure developments within the area, where these may require safeguarding of land to prevent other type of development occurring. Southern Water should engage with the Local Plan process on any requirement to phase development in the Sussex North Water Resource Zone in order to align development with infrastructure investment in response to sustainability concerns relating to the Hardham abstraction.
Environmental Protection				
EP1	Development and Flood Risk	This policy sets out requirements to mitigate flood risk from new development. The policy is positive in nature aiming to protect the natural environment, does not trigger any development or change and can therefore be screened out under Category D.	Screened out.	Policies could be enhanced by including recommendations set out in the WCS in terms of mitigating impacts on water quality. Some of these have been extracted as an example. Policies could ensure that timescales associated with technological improvements in WwTW (to ensure the protection of water quality) are compatible with growth projections in the Local Plan as per WCS recommendations. The Local Plan could include policies that require development sites to adopt SuDS to manage water quality of surface runoff. Surface' or 'green' drainage solutions should aid improvements in water quality, such as swales along hardstanding

				boundaries, or a more advanced reed bed system for larger sites. Opportunities could be identified to incorporate SuDS into open spaces and green infrastructure, to deliver strategic flood risk management and meet WFD water quality targets. Developers could include the design of SuDS at an early stage to maximise the benefits of such schemes. Work could be undertaken with developers to discourage connection of new developments into existing surface water and combined sewer networks. Connections into the foul network should be prevented as this is a significant cause of sewer flooding. Opportunities for Natural Flood Management that include schemes aimed at reducing / managing runoff could be considered to reduce nutrient and sediment pollution within the Gatwick Sub- Region
EP2	Flood Risk Guidance for Householder Development, Small Non- Residential Extensions	This policy sets out requirements for flood risk assessments. The policy is positive in nature aiming to protect the natural environment, does not trigger any development or change and can therefore be screened out under Category D.	Screened out.	Polices could be enhanced by considering the inclusion of a drainage strategy. This could look to protect water quality (surface and ground) from contaminated run off.
EP3	Land and Water Quality	This policy sets out requirements for new development to protect land and water quality. The policy is positive in nature aiming to protect the natural environment, does not trigger any development or change and can therefore be screened out under Category D.	Screened out.	See above recommendations in terms of incorporating water quality mitigation.

EP4	Development and Noise	This policy sets out requirements for new development to mitigate unacceptable levels of noise. The policy is positive in nature aiming to protect the natural environment, does not trigger any development or change and can therefore be screened out under Category D.	Screened out.	
EP5	Air Quality	This policy sets out requirements to reduce air pollution and improve air quality. The policy is positive in nature aiming to protect the natural environment, does not trigger any development or change and can therefore be screened out under Category D.	Screened out.	Policy EP5 may need to be updated depending on the output of the air quality work as part of the HRA to have a focus on habitats.
EP6	External Lighting	This policy sets out design requirements to reduce light pollution. The policy is positive in nature aiming to protect the natural environment, does not trigger any development or change and can therefore be screened out under Category D.	Screened out.	
Sustainable Transport				
ST1	Development and Requirements for Sustainable Transport	This policy sets out design requirements to promote sustainable transport in new development. The policy does not in itself trigger any development or change and can therefore be screened out under Category F.	Screened out.	
ST2	Car and Cycle Parking Standards	This policy sets out design requirements for car and cycle parking standards. The policy does not in itself trigger any development or change and can therefore be screened out under Category F.	Screened out.	
ST3	Improving Rail Stations	This policy sets out how new development will support railway stations. The policy does not in itself trigger any development or change and can therefore be screened out under Category F.	Screened out.	
ST4	Safeguarding of a Search Corridor for a Crawley Western Link Road	This policy safeguards a search corridor for a Crawley Western Link Road. The Local Plan does not trigger the requirement for this road or require on its delivery to secure development set out over the Plan period. As such it can be screened out under Category C.	Screened out.	

Appendix F: Allocations Screening Summary

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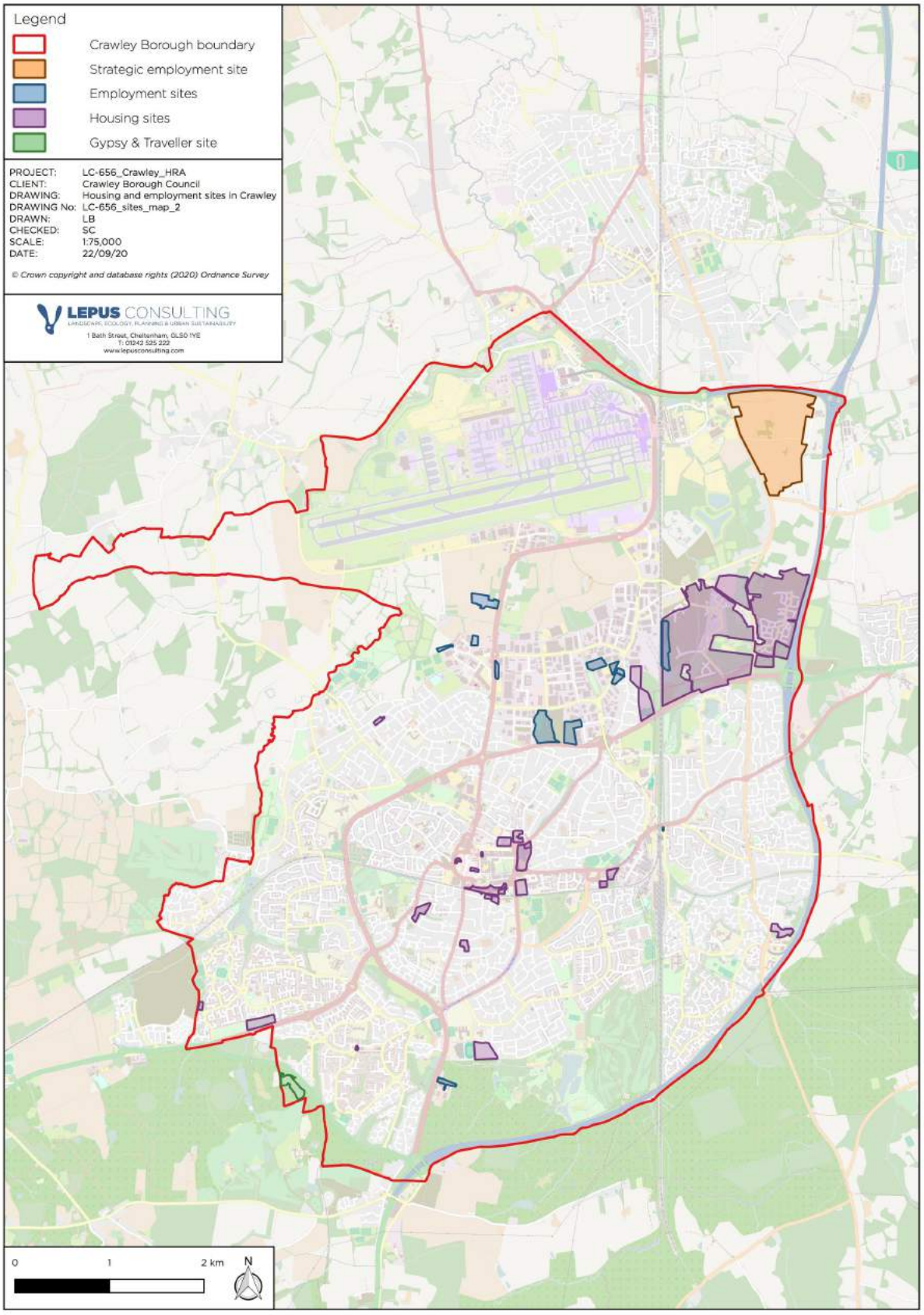

***Figure F.1**: Plan of allocations*

Table F.1: *Screening summary of allocations in the Local Plan*

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
Housing Allocations										
1	North East Sector	Greenfield	1171350.67628	1083	LSEs from the Local Plan alone and in-combination on air quality. European sites vulnerable to air pollution include: - Ashdown Forest SPA and SAC - Mole Gap to Reigate Escarpment SAC.	Allocation not located with zone of influence. No LSE.	Allocation is located within River Mole catchment. Gatwick Stream flows through the sites. Development will require increased discharges to WwTWs which discharge to the River Mole. Development is likely to increase pressure on public water supply abstraction	This allocation is not located within the Bechstein's bat CSZ of 3km. No LSEs expected alone.	Potential LSEs from all Local Plan allocations combined and in-combination with other plans and projects include: - Air Quality at Ashdown Forest SAC/SPA and Mole Gap to Reigate Escarpment SAC. - Hydrology impacts at Mole Gap to	Screened in Category I and L.

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
							from River Arun catchment. A change in water levels / water quality may affect habitats upon which species rely. Alone LSEs due to changes in water quality and water quantity are expected at: - Mole Gap to Reigate Escarpment SAC. - Arun Valley SAP/SAC/Ramsar.		Reigate Escarpment SAC, Arun Valley SPA/SAC/Ramsar and The Mens SAC.	

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
							- The Mens SAC.			
2	Land adj Steers Lane	Greenfield	79772.4494596	185	LSEs from the Local Plan alone and in-combination on air quality. European sites vulnerable to air pollution include: - Ashdown Forest SPA and SAC - Mole Gap to Reigate Escarpment SAC.	Allocation not located with zone of influence. No LSE.	Allocation is located within River Mole catchment. Gatwick Stream is located 147m to the west. Development will require increased discharges to WwTWs which discharge to the River Mole. Development is likely to increase pressure on public water supply abstraction from River	This allocation is not located within the Bechstein's bat CSZ of 3km. No LSEs expected alone.	Potential LSEs from all Local Plan allocations combined and in-combination with other plans and projects include: - Air Quality at Ashdown Forest SAC/SPA and Mole Gap to Reigate Escarpment SAC. - Hydrology impacts at Mole Gap to	Screened in Category I and L.

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
							Arun catchment. A change in water levels / water quality may affect habitats upon which species rely. Alone LSEs due to changes in water quality and water quantity are expected at: - Mole Gap to Reigate Escarpment SAC. - Arun Valley SAP/SAC/Ramsar. - The Mens SAC.		Reigate Escarpment SAC, Arun Valley SPA/SAC/Ramsar and The Mens SAC.	

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
3	Zurich House, East Park	Brownfield (offices)	3061.66110435	53	LSEs from the Local Plan alone and in-combination on air quality. European sites vulnerable to air pollution include: - Ashdown Forest SPA and SAC - Mole Gap to Reigate Escarpment SAC.	Allocation not located with zone of influence. No LSE.	Allocation is located within River Mole catchment. Development will require increased discharges to WwTWs which discharge to the River Mole. Development is likely to increase pressure on public water supply abstraction from River Arun catchment. A change in water levels / water quality may affect	This allocation is not located within the Bechstein's bat CSZ of 3km. No LSEs expected alone.	Potential LSEs from all Local Plan allocations combined and in-combination with other plans and projects include: - Air Quality at Ashdown Forest SAC/SPA and Mole Gap to Reigate Escarpment SAC. - Hydrology impacts at Mole Gap to Reigate Escarpment SAC, Arun	Screened in Category I and L.

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
							habitats upon which species rely. Alone LSEs due to changes in water quality and water quantity are expected at: - Mole Gap to Reigate Escarpment SAC. - Arun Valley SAP/SAC/Ramsar. - The Mens SAC.		Valley SPA/SAC/Ramsar and The Mens SAC.	
4	Former TSB Site, Russell Way	Brownfield (cleared site)	4941.188487	90	LSEs from the Local Plan alone and in-combination on air quality.	Allocation not located with zone of influence. No LSE.	Allocation is located within River Mole catchment. Waterlea Meadow	This allocation is not located within the Bechstein's bat CSZ of 3km.	Potential LSEs from all Local Plan allocations combined and in-	Screened in Category I and L.

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
					European sites vulnerable to air pollution include: - Ashdown Forest SPA and SAC - Mole Gap to Reigate Escarpment SAC.		located approx. 440m to the south. Development will require increased discharges to WwTWs which discharge to the River Mole. Development is likely to increase pressure on public water supply abstraction from River Arun catchment. A change in water levels / water quality may affect habitats upon	No LSEs expected alone.	combination with other plans and projects include: - Air Quality at Ashdown Forest SAC/SPA and Mole Gap to Reigate Escarpment SAC. - Hydrology impacts at Mole Gap to Reigate Escarpment SAC, Arun Valley SPA/SAC/Ramsar and The Mens SAC.	

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
							which species rely. Alone LSEs due to changes in water quality and water quantity are expected at: - Mole Gap to Reigate Escarpment SAC. - Arun Valley SAP/SAC/Ramsar. - The Mens SAC.			
5	7 - 13 The Broadway & 1 - 3 Queens Square	Brownfield (upper floor ancillary retail & office space)	907.990735195	25	LSEs from the Local Plan alone and in-combination on air quality. European sites	Allocation not located with zone of influence. No LSE.	Allocation is located within River Mole catchment. Development will require increased	This allocation is not located within the Bechstein's bat CSZ of 3km. No LSEs expected alone.	Potential LSEs from all Local Plan allocations combined and in-combination	Screened in Category I and L.

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
					vulnerable to air pollution include: - Ashdown Forest SPA and SAC - Mole Gap to Reigate Escarpment SAC.		discharges to WwTWs which discharge to the River Mole. Development is likely to increase pressure on public water supply abstraction from River Arun catchment. A change in water levels / water quality may affect habitats upon which species rely. Alone LSEs due to changes in water quality		with other plans and projects include: - Air Quality at Ashdown Forest SAC/SPA and Mole Gap to Reigate Escarpment SAC. - Hydrology impacts at Mole Gap to Reigate Escarpment SAC, Arun Valley SPA/SAC/Ramsar and The Mens SAC.	

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
							and water quantity are expected at: - Mole Gap to Reigate Escarpment SAC. - Arun Valley SAP/SAC/Ramsar. - The Mens SAC.			
6	Sutherland House (Eastern Section) and Land Adj	Brownfield (within site of office building now converted to flats)	9094.7832224	30	LSEs from the Local Plan alone and in-combination on air quality. European sites vulnerable to air pollution include:	Allocation not located with zone of influence. No LSE.	Allocation is located within River Mole catchment. Waterlea Meadow located approx. 470m to the south. Development will require increased discharges to	This allocation is not located within the Bechstein's bat CSZ of 3km. No LSEs expected alone.	Potential LSEs from all Local Plan allocations combined and in-combination with other plans and projects include: - Air Quality at Ashdown	Screened in Category I and L.

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
					- Ashdown Forest SPA and SAC - Mole Gap to Reigate Escarpment SAC.		WwTWs which discharge to the River Mole. Development is likely to increase pressure on public water supply abstraction from River Arun catchment. A change in water levels / water quality may affect habitats upon which species rely. Alone LSEs due to changes in water quality and water		Forest SAC/SPA and Mole Gap to Reigate Escarpment SAC. - Hydrology impacts at Mole Gap to Reigate Escarpment SAC, Arun Valley SPA/SAC/Ramsar and The Mens SAC.	

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
							quantity are expected at: - Mole Gap to Reigate Escarpment SAC. - Arun Valley SAP/SAC/Ramsar. - The Mens SAC.			
7	Shaw House	Brownfield (offices)	1997.23880586	33	LSEs from the Local Plan alone and in-combination on air quality. European sites vulnerable to air pollution include: - Ashdown Forest SPA and SAC	Allocation not located with zone of influence. No LSE.	Allocation is located within River Mole catchment. Development will require increased discharges to WwTWs which discharge to the River Mole. Development	This allocation is not located within the Bechstein's bat CSZ of 3km. No LSEs expected alone.	Potential LSEs from all Local Plan allocations combined and in-combination with other plans and projects include: - Air Quality at Ashdown Forest	Screened in Category I and L.

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
					- Mole Gap to Reigate Escarpment SAC.		is likely to increase pressure on public water supply abstraction from River Arun catchment. A change in water levels / water quality may affect habitats upon which species rely. Alone LSEs due to changes in water quality and water quantity are expected at: - Mole Gap to Reigate		SAC/SPA and Mole Gap to Reigate Escarpment SAC. - Hydrology impacts at Mole Gap to Reigate Escarpment SAC, Arun Valley SPA/SAC/Ramsar and The Mens SAC.	

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
							Escarpment SAC. - Arun Valley SAP/SAC/Ramsar. - The Mens SAC.			
8	Longley Building	Brownfield (offices)	4864.72435	100	LSEs from the Local Plan alone and in-combination on air quality. European sites vulnerable to air pollution include: - Ashdown Forest SPA and SAC - Mole Gap to Reigate	Allocation not located with zone of influence. No LSE.	Allocation is located within River Mole catchment. Development will require increased discharges to WwTWs which discharge to the River Mole. Development is likely to increase pressure on public water supply	This allocation is not located within the Bechstein's bat CSZ of 3km. No LSEs expected alone.	Potential LSEs from all Local Plan allocations combined and in-combination with other plans and projects include: - Air Quality at Ashdown Forest SAC/SPA and Mole Gap to Reigate	Screened in Category I and L.

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
					Escarpment SAC.		abstraction from River Arun catchment. A change in water levels / water quality may affect habitats upon which species rely. Alone LSEs due to changes in water quality and water quantity are expected at: - Mole Gap to Reigate Escarpment SAC. - Arun Valley SAP/SAC/Ramsar.		Escarpment SAC. - Hydrology impacts at Mole Gap to Reigate Escarpment SAC, Arun Valley SPA/SAC/Ramsar and The Mens SAC.	

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
							- The Mens SAC.			
9	Land Adjacent to Desmond Anderson	Greenfield/ cleared brownfield site	35151.6341735	150	LSEs from the Local Plan alone and in-combination on air quality. European sites vulnerable to air pollution include: - Ashdown Forest SPA and SAC - Mole Gap to Reigate Escarpment SAC.	Allocation not located with zone of influence. No LSE.	Allocation is located within River Mole catchment. Titmus Lake located approx. 150m to south and connecting water course adjacent to eastern site boundary. Development will require increased discharges to WwTWs which discharge to the River Mole. Development is likely to increase	This allocation is not located within the Bechstein's bat CSZ of 3km. No LSEs expected alone.	Potential LSEs from all Local Plan allocations combined and in-combination with other plans and projects include: - Air Quality at Ashdown Forest SAC/SPA and Mole Gap to Reigate Escarpment SAC. - Hydrology impacts at Mole Gap to Reigate	Screened in Category I and L.

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
							pressure on public water supply abstraction from River Arun catchment. A change in water levels / water quality may affect habitats upon which species rely. Alone LSEs due to changes in water quality and water quantity are expected at: - Mole Gap to Reigate Escarpment SAC.		Escarpment SAC, Arun Valley SPA/SAC/Ramsar and The Mens SAC.	

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
							- Arun Valley SAP/SAC/Ramsar. - The Mens SAC.			
10	Land to the southeast of Heathy Farm	Greenfield	21084.1042775	150	LSEs from the Local Plan alone and in-combination on air quality. European sites vulnerable to air pollution include: - Ashdown Forest SPA and SAC - Mole Gap to Reigate Escarpment SAC.	Allocation not located with zone of influence. No LSE.	Allocation is located within River Mole catchment. Development will require increased discharges to WwTWs which discharge to the River Mole. Development is likely to increase pressure on public water supply abstraction from River Arun	This allocation is not located within the Bechstein's bat CSZ of 3km. No LSEs expected alone.	Potential LSEs from all Local Plan allocations combined and in-combination with other plans and projects include: - Air Quality at Ashdown Forest SAC/SPA and Mole Gap to Reigate Escarpment SAC.	Screened in Category I and L.

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
							catchment. A change in water levels / water quality may affect habitats upon which species rely. Alone LSEs due to changes in water quality and water quantity are expected at: - Mole Gap to Reigate Escarpment SAC. - Arun Valley SAP/SAC/Ramsar. - The Mens SAC.		- Hydrology impacts at Mole Gap to Reigate Escarpment SAC, Arun Valley SPA/SAC/Ramsar and The Mens SAC.	

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
11	The Imperial, Broadfield Barton	Brownfield (pub & residence)	1047.02495	19	LSEs from the Local Plan alone and in-combination on air quality. European sites vulnerable to air pollution include: - Ashdown Forest SPA and SAC - Mole Gap to Reigate Escarpment SAC.	Allocation not located with zone of influence. No LSE.	Allocation is located within River Mole catchment. Development will require increased discharges to WwTWs which discharge to the River Mole. Development is likely to increase pressure on public water supply abstraction from River Arun catchment. A change in water levels / water quality may affect	This allocation is not located within the Bechstein's bat CSZ of 3km. No LSEs expected alone.	Potential LSEs from all Local Plan allocations combined and in-combination with other plans and projects include: - Air Quality at Ashdown Forest SAC/SPA and Mole Gap to Reigate Escarpment SAC. - Hydrology impacts at Mole Gap to Reigate Escarpment SAC, Arun	Screened in Category I and L.

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
							habitats upon which species rely. Alone LSEs due to changes in water quality and water quantity are expected at: - Mole Gap to Reigate Escarpment SAC. - Arun Valley SAP/SAC/Ramsar. - The Mens SAC.		Valley SPA/SAC/Ramsar and The Mens SAC.	
12	Telford Place	Brownfield (temporary car park)	17380.8379902	300	LSEs from the Local Plan alone and in-combination on air quality.	Allocation not located with zone of influence. No LSE.	Allocation is located within River Mole catchment. Development will require	This allocation is not located within the Bechstein's bat CSZ of 3km.	Potential LSEs from all Local Plan allocations combined and in-	Screened in Category I and L.

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
					European sites vulnerable to air pollution include: - Ashdown Forest SPA and SAC - Mole Gap to Reigate Escarpment SAC.		increased discharges to WwTWs which discharge to the River Mole. Development is likely to increase pressure on public water supply abstraction from River Arun catchment. A change in water levels / water quality may affect habitats upon which species rely. Alone LSEs due to changes in	No LSEs expected alone.	combination with other plans and projects include: - Air Quality at Ashdown Forest SAC/SPA and Mole Gap to Reigate Escarpment SAC. - Hydrology impacts at Mole Gap to Reigate Escarpment SAC, Arun Valley SPA/SAC/Ramsar and The Mens SAC.	

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
							water quality and water quantity are expected at: - Mole Gap to Reigate Escarpment SAC. - Arun Valley SAP/SAC/Ramsar. - The Mens SAC.			
13	Crawley Station and Car Parks	Brownfield (railway Station & car parks)	20443.3546409	308	LSEs from the Local Plan alone and in-combination on air quality. European sites vulnerable to air pollution include:	Allocation not located with zone of influence. No LSE.	Allocation is located within River Mole catchment. Development will require increased discharges to WwTWs which discharge to the River	This allocation is not located within the Bechstein's bat CSZ of 3km. No LSEs expected alone.	Potential LSEs from all Local Plan allocations combined and in-combination with other plans and projects include:	Screened in Category I and L.

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
					- Ashdown Forest SPA and SAC - Mole Gap to Reigate Escarpment SAC.		Mole. Development is likely to increase pressure on public water supply abstraction from River Arun catchment. A change in water levels / water quality may affect habitats upon which species rely. Alone LSEs due to changes in water quality and water quantity are expected at: - Mole Gap to Reigate		- Air Quality at Ashdown Forest SAC/SPA and Mole Gap to Reigate Escarpment SAC. - Hydrology impacts at Mole Gap to Reigate Escarpment SAC, Arun Valley SPA/SAC/Ramsar and The Mens SAC.	

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
							Escarpment SAC. - Arun Valley SAP/SAC/Ramsar. - The Mens SAC.			
14	County Buildings	Brownfield (offices)	10483.1972718	100	LSEs from the Local Plan alone and in-combination on air quality. European sites vulnerable to air pollution include: - Ashdown Forest SPA and SAC - Mole Gap to Reigate	Allocation not located with zone of influence. No LSE.	Allocation is located within River Mole catchment. Watercourse approx. 170m to north east. Development will require increased discharges to WwTWs which discharge to the River Mole. Development is likely to increase	This allocation is not located within the Bechstein's bat CSZ of 3km. No LSEs expected alone.	Potential LSEs from all Local Plan allocations combined and in-combination with other plans and projects include: - Air Quality at Ashdown Forest SAC/SPA and Mole Gap to Reigate	Screened in Category I and L.

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
					Escarpment SAC.		pressure on public water supply abstraction from River Arun catchment. A change in water levels / water quality may affect habitats upon which species rely. Alone LSEs due to changes in water quality and water quantity are expected at: - Mole Gap to Reigate Escarpment SAC.		Escarpment SAC. - Hydrology impacts at Mole Gap to Reigate Escarpment SAC, Arun Valley SPA/SAC/Ramsar and The Mens SAC.	

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
							- Arun Valley SAP/SAC/Ramsar. - The Mens SAC.			
15	Land North of the Boulevard	Brownfield (offices)	12892.3858454	182	LSEs from the Local Plan alone and in-combination on air quality. European sites vulnerable to air pollution include: - Ashdown Forest SPA and SAC - Mole Gap to Reigate Escarpment SAC.	Allocation not located with zone of influence. No LSE.	Allocation is located within River Mole catchment. Development will require increased discharges to WwTWs which discharge to the River Mole. Development is likely to increase pressure on public water supply abstraction from River Arun	This allocation is not located within the Bechstein's bat CSZ of 3km. No LSEs expected alone.	Potential LSEs from all Local Plan allocations combined and in-combination with other plans and projects include: - Air Quality at Ashdown Forest SAC/SPA and Mole Gap to Reigate Escarpment SAC.	Screened in Category I and L.

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
							catchment. A change in water levels / water quality may affect habitats upon which species rely. Alone LSEs due to changes in water quality and water quantity are expected at: - Mole Gap to Reigate Escarpment SAC. - Arun Valley SAP/SAC/Ramsar. - The Mens SAC.		- Hydrology impacts at Mole Gap to Reigate Escarpment SAC, Arun Valley SPA/SAC/Ramsar and The Mens SAC.	

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
16	Crawley College	Brownfield (FE College)	34139.1614566	400	LSEs from the Local Plan alone and in-combination on air quality. European sites vulnerable to air pollution include: - Ashdown Forest SPA and SAC - Mole Gap to Reigate Escarpment SAC.	Allocation not located with zone of influence. No LSE.	Allocation is located within River Mole catchment. Watercourse approx. 150m to north. Development will require increased discharges to WwTWs which discharge to the River Mole. Development is likely to increase pressure on public water supply abstraction from River Arun catchment. A change in	This allocation is not located within the Bechstein's bat CSZ of 3km. No LSEs expected alone.	Potential LSEs from all Local Plan allocations combined and in-combination with other plans and projects include: - Air Quality at Ashdown Forest SAC/SPA and Mole Gap to Reigate Escarpment SAC. - Hydrology impacts at Mole Gap to Reigate Escarpment SAC, Arun	Screened in Category I and L.

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
							water levels / water quality may affect habitats upon which species rely. Alone LSEs due to changes in water quality and water quantity are expected at: - Mole Gap to Reigate Escarpment SAC. - Arun Valley SAP/SAC/Ramsar. - The Mens SAC.		Valley SPA/SAC/Ramsar and The Mens SAC.	
17	The Old Vicarage, Church	Brownfield (residential, community	2498.22907989	20	LSEs from the Local Plan alone and in-	Allocation not located with zone of	Allocation is located within River Mole	This allocation is not located within the	Potential LSEs from all Local Plan	Screened in Category I and L.

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
	Walk (Cross Keys)	building, parking)			combination on air quality. European sites vulnerable to air pollution include: - Ashdown Forest SPA and SAC - Mole Gap to Reigate Escarpment SAC.	influence. No LSE.	catchment. Development will require increased discharges to WwTWs which discharge to the River Mole. Development is likely to increase pressure on public water supply abstraction from River Arun catchment. A change in water levels / water quality may affect habitats upon which species rely.	Bechstein's bat CSZ of 3km. No LSEs expected alone.	allocations combined and in-combination with other plans and projects include: - Air Quality at Ashdown Forest SAC/SPA and Mole Gap to Reigate Escarpment SAC. - Hydrology impacts at Mole Gap to Reigate Escarpment SAC, Arun Valley SPA/SAC/Ra	

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
							Alone LSEs due to changes in water quality and water quantity are expected at: - Mole Gap to Reigate Escarpment SAC. - Arun Valley SAP/SAC/Ramsar. - The Mens SAC.		msar and The Mens SAC.	
18	Moka	Brownfield (night club)	3787.863739556	152	LSEs from the Local Plan alone and in-combination on air quality. European sites vulnerable to	Allocation not located with zone of influence. No LSE.	Allocation is located within River Mole catchment. Development will require increased discharges to WwTWs	This allocation is not located within the Bechstein's bat CSZ of 3km. No LSEs expected alone.	Potential LSEs from all Local Plan allocations combined and in-combination with other plans and	Screened in Category I and L.

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
					air pollution include: - Ashdown Forest SPA and SAC - Mole Gap to Reigate Escarpment SAC.		which discharge to the River Mole. Development is likely to increase pressure on public water supply abstraction from River Arun catchment. A change in water levels / water quality may affect habitats upon which species rely. Alone LSEs due to changes in water quality and water		projects include: - Air Quality at Ashdown Forest SAC/SPA and Mole Gap to Reigate Escarpment SAC. - Hydrology impacts at Mole Gap to Reigate Escarpment SAC, Arun Valley SPA/SAC/Ramsar and The Mens SAC.	

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
							quantity are expected at: - Mole Gap to Reigate Escarpment SAC. - Arun Valley SAP/SAC/Ramsar. - The Mens SAC.			
19	Tinsley Lane Playing Fields	Greenfield (playing fields)	59747.3069961	120	LSEs from the Local Plan alone and in-combination on air quality. European sites vulnerable to air pollution include: - Ashdown Forest SPA and SAC	Allocation not located with zone of influence. No LSE.	Allocation is located within River Mole catchment. Pond (potentially linked to Gatwick Stream) on opposite side of railway track approx. 220m to east. Development	This allocation is not located within the Bechstein's bat CSZ of 3km. No LSEs expected alone.	Potential LSEs from all Local Plan allocations combined and in-combination with other plans and projects include: - Air Quality at Ashdown Forest	Screened in Category I and L.

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
					- Mole Gap to Reigate Escarpment SAC.		will require increased discharges to WwTWs which discharge to the River Mole. Development is likely to increase pressure on public water supply abstraction from River Arun catchment. A change in water levels / water quality may affect habitats upon which species rely. Alone LSEs due to		SAC/SPA and Mole Gap to Reigate Escarpment SAC. - Hydrology impacts at Mole Gap to Reigate Escarpment SAC, Arun Valley SPA/SAC/Ramsar and The Mens SAC.	

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
							changes in water quality and water quantity are expected at: - Mole Gap to Reigate Escarpment SAC. - Arun Valley SAP/SAC/Ramsar. - The Mens SAC.			
20	Breezehurst Drive Playing Fields	Greenfield (playing fields)	27372.6619158	65	LSEs from the Local Plan alone and in-combination on air quality. European sites vulnerable to air pollution include:	Allocation not located with zone of influence. No LSE.	Allocation is located within River Mole catchment. Dauster Brook running along western site boundary. Development will require	This allocation is not located within the Bechstein's bat CSZ of 3km. No LSEs expected alone.	Potential LSEs from all Local Plan allocations combined and in-combination with other plans and projects include:	Screened in Category I and L.

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
					- Ashdown Forest SPA and SAC - Mole Gap to Reigate Escarpment SAC.		increased discharges to WwTWs which discharge to the River Mole. Development is likely to increase pressure on public water supply abstraction from River Arun catchment. A change in water levels / water quality may affect habitats upon which species rely. Alone LSEs due to changes in		- Air Quality at Ashdown Forest SAC/SPA and Mole Gap to Reigate Escarpment SAC. - Hydrology impacts at Mole Gap to Reigate Escarpment SAC, Arun Valley SPA/SAC/Ramsar and The Mens SAC.	

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
							water quality and water quantity are expected at: - Mole Gap to Reigate Escarpment SAC. - Arun Valley SAP/SAC/Ramsar. - The Mens SAC.			
21	Henty Close	Greenfield (play area)	3518.27745947	24	LSEs from the Local Plan alone and in-combination on air quality. European sites vulnerable to air pollution include:	Allocation not located with zone of influence. No LSE.	Allocation is located within River Mole catchment. Spruce Hill Brook running along eastern site boundary. Development will require increased	This allocation is not located within the Bechstein's bat CSZ of 3km. No LSEs expected alone.	Potential LSEs from all Local Plan allocations combined and in-combination with other plans and projects include:	Screened in Category I and L.

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
					- Ashdown Forest SPA and SAC - Mole Gap to Reigate Escarpment SAC.		discharges to WwTWs which discharge to the River Mole. Development is likely to increase pressure on public water supply abstraction from River Arun catchment. A change in water levels / water quality may affect habitats upon which species rely. Alone LSEs due to changes in water quality		- Air Quality at Ashdown Forest SAC/SPA and Mole Gap to Reigate Escarpment SAC. - Hydrology impacts at Mole Gap to Reigate Escarpment SAC, Arun Valley SPA/SAC/Ramsar and The Mens SAC.	

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
							and water quantity are expected at: - Mole Gap to Reigate Escarpment SAC. - Arun Valley SAP/SAC/Ramsar. - The Mens SAC.			
22	Rushetts Road Play Area	Greenfield (play area)	4163.362941	14	LSEs from the Local Plan alone and in-combination on air quality. European sites vulnerable to air pollution include:	Allocation not located with zone of influence. No LSE.	Allocation is located within River Mole catchment. Development will require increased discharges to WwTWs which discharge to the River Mole.	This allocation is not located within the Bechstein's bat CSZ of 3km. No LSEs expected alone.	Potential LSEs from all Local Plan allocations combined and in-combination with other plans and projects include: - Air Quality at Ashdown	Screened in Category I and L.

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
					- Ashdown Forest SPA and SAC - Mole Gap to Reigate Escarpment SAC.		Development is likely to increase pressure on public water supply abstraction from River Arun catchment. A change in water levels / water quality may affect habitats upon which species rely. Alone LSEs due to changes in water quality and water quantity are expected at: - Mole Gap to Reigate		Forest SAC/SPA and Mole Gap to Reigate Escarpment SAC. - Hydrology impacts at Mole Gap to Reigate Escarpment SAC, Arun Valley SPA/SAC/Ramsar and The Mens SAC.	

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
							Escarpment SAC. - Arun Valley SAP/SAC/Ramsar. - The Mens SAC.			
23	Land East of Balcombe Road/Street Hill	Greenfield	17545.057975	15	LSEs from the Local Plan alone and in-combination on air quality. European sites vulnerable to air pollution include: - Ashdown Forest SPA and SAC - Mole Gap to Reigate	Allocation not located with zone of influence. No LSE.	Allocation is located within River Mole catchment. Tributary of Gatwick Stream running along southern site boundary. Development will require increased discharges to WwTWs which discharge to the River Mole.	This allocation is not located within the Bechstein's bat CSZ of 3km. No LSEs expected alone.	Potential LSEs from all Local Plan allocations combined and in-combination with other plans and projects include: - Air Quality at Ashdown Forest SAC/SPA and Mole Gap to Reigate	Screened in Category I and L.

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
					Escarpment SAC.		Development is likely to increase pressure on public water supply abstraction from River Arun catchment. A change in water levels / water quality may affect habitats upon which species rely. Alone LSEs due to changes in water quality and water quantity are expected at: - Mole Gap to Reigate		Escarpment SAC. - Hydrology impacts at Mole Gap to Reigate Escarpment SAC, Arun Valley SPA/SAC/Ramsar and The Mens SAC.	

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
							Escarpment SAC. - Arun Valley SAP/SAC/Ramsar. - The Mens SAC.			
24	Oakhurst Grange	Brownfield (cleared site, formerly nursing home)	14849.629619	81	LSEs from the Local Plan alone and in-combination on air quality. European sites vulnerable to air pollution include: - Ashdown Forest SPA and SAC - Mole Gap to Reigate	Allocation not located with zone of influence. No LSE.	Allocation is located within River Mole catchment. Development will require increased discharges to WwTWs which discharge to the River Mole. Development is likely to increase pressure on public water supply	This allocation is not located within the Bechstein's bat CSZ of 3km. No LSEs expected alone.	Potential LSEs from all Local Plan allocations combined and in-combination with other plans and projects include: - Air Quality at Ashdown Forest SAC/SPA and Mole Gap to Reigate	Screened in Category I and L.

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
					Escarpment SAC.		abstraction from River Arun catchment. A change in water levels / water quality may affect habitats upon which species rely. Alone LSEs due to changes in water quality and water quantity are expected at: - Mole Gap to Reigate Escarpment SAC. - Arun Valley SAP/SAC/Ramsar.		Escarpment SAC. - Hydrology impacts at Mole Gap to Reigate Escarpment SAC, Arun Valley SPA/SAC/Ramsar and The Mens SAC.	

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
							- The Mens SAC.			
25	St. Catherine 's Hospice	Brownfield (hospice)	7292.06967695	60	LSEs from the Local Plan alone and in-combination on air quality. European sites vulnerable to air pollution include: - Ashdown Forest SPA and SAC - Mole Gap to Reigate Escarpment SAC.	Allocation not located with zone of influence. No LSE.	Allocation is located within River Mole catchment. Development will require increased discharges to WwTWs which discharge to the River Mole. Development is likely to increase pressure on public water supply abstraction from River Arun catchment. A change in water levels /	This allocation is not located within the Bechstein's bat CSZ of 3km. No LSEs expected alone.	Potential LSEs from all Local Plan allocations combined and in-combination with other plans and projects include: - Air Quality at Ashdown Forest SAC/SPA and Mole Gap to Reigate Escarpment SAC. - Hydrology impacts at Mole Gap to Reigate	Screened in Category I and L.

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
							water quality may affect habitats upon which species rely. Alone LSEs due to changes in water quality and water quantity are expected at: - Mole Gap to Reigate Escarpment SAC. - Arun Valley SAP/SAC/Ramsar. - The Mens SAC.		Escarpment SAC, Arun Valley SPA/SAC/Ramsar and The Mens SAC.	
?	Crawley College Car Park	Brownfield (car park)	3610.97276758	98	LSEs from the Local Plan alone and in-	Allocation not located with zone of	Allocation is located within River Mole catchment.	This allocation is not located within the Bechstein's bat	Potential LSEs from all Local Plan allocations	Screened in Category I and L.

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
					combination on air quality. European sites vulnerable to air pollution include: - Ashdown Forest SPA and SAC - Mole Gap to Reigate Escarpment SAC.	influence. No LSE.	Development will require increased discharges to WwTWs which discharge to the River Mole. Development is likely to increase pressure on public water supply abstraction from River Arun catchment. A change in water levels / water quality may affect habitats upon which species rely.	CSZ of 3km. No LSEs expected alone.	combined and in-combination with other plans and projects include: - Air Quality at Ashdown Forest SAC/SPA and Mole Gap to Reigate Escarpment SAC. - Hydrology impacts at Mole Gap to Reigate Escarpment SAC, Arun Valley SPA/SAC/Ramsar and The Mens SAC.	

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
							Alone LSEs due to changes in water quality and water quantity are expected at: - Mole Gap to Reigate Escarpment SAC. - Arun Valley SAP/SAC/Ramsar. - The Mens SAC.			
?	Land to the southeast of Heathy Farm	Greenfield	22209.7221154	150	LSEs from the Local Plan alone and in-combination on air quality. European sites vulnerable to	Allocation not located with zone of influence. No LSE.	Allocation is located within River Mole catchment. Development will require increased discharges to WwTWs	This allocation is not located within the Bechstein's bat CSZ of 3km. No LSEs expected alone.	Potential LSEs from all Local Plan allocations combined and in-combination with other plans and	Screened in Category I and L.

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
					air pollution include: - Ashdown Forest SPA and SAC - Mole Gap to Reigate Escarpment SAC.		which discharge to the River Mole. Development is likely to increase pressure on public water supply abstraction from River Arun catchment. A change in water levels / water quality may affect habitats upon which species rely. Alone LSEs due to changes in water quality and water		projects include: - Air Quality at Ashdown Forest SAC/SPA and Mole Gap to Reigate Escarpment SAC. - Hydrology impacts at Mole Gap to Reigate Escarpment SAC, Arun Valley SPA/SAC/Ramsar and The Mens SAC.	

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
							quantity are expected at: - Mole Gap to Reigate Escarpment SAC. - Arun Valley SAP/SAC/Ramsar. - The Mens SAC.			
Employment Allocations										
A	Nexus Gatwick Road (Parcel 3)	Vacant Brownfield		Office	LSEs from the Local Plan alone and in-combination on air quality. European sites vulnerable to air pollution include:	Allocation is not located within any urbanisation zones of influence. No LSEs expected from this employment allocation.	Allocation is located within River Mole catchment. Crowter's Brook located approx. 195m to the west of this allocation. Development will require increased	This allocation is not located within the Bechstein's bat CSZ of 3km. No LSEs expected alone.	Potential LSEs from all Local Plan allocations combined and in-combination with other plans and projects include:	Screened in Category I and L.

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
					- Ashdown Forest SPA and SAC - Mole Gap to Reigate Escarpment SAC.		discharges to WwTWs which discharge to the River Mole. Development is likely to increase pressure on public water supply abstraction from River Arun catchment. A change in water levels / water quality may affect habitats upon which species rely. Alone LSEs due to changes in water quality		- Air Quality at Ashdown Forest SAC/SPA and Mole Gap to Reigate Escarpment SAC. - Hydrology impacts at Mole Gap to Reigate Escarpment SAC, Arun Valley SPA/SAC/Ramsar and The Mens SAC.	

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
							and water quantity are expected at: - Mole Gap to Reigate Escarpment SAC. - Arun Valley SAP/SAC/Ramsar. - The Mens SAC.			
B	Wingspan Club	Vacant Brownfield (with a large area of open space)		Warehouse	LSEs from the Local Plan alone and in-combination on air quality. European sites vulnerable to air pollution include:	Allocation is not located within any urbanisation zones of influence. No LSEs expected from this employment allocation.	Allocation is located within River Mole catchment. Development will require increased discharges to WwTWs which discharge to the River Mole.	This allocation is not located within the Bechstein's bat CSZ of 3km. No LSEs expected alone.	Potential LSEs from all Local Plan allocations combined and in-combination with other plans and projects include: - Air Quality at Ashdown	Screened in Category I and L.

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
					- Ashdown Forest SPA and SAC - Mole Gap to Reigate Escarpment SAC.		Development is likely to increase pressure on public water supply abstraction from River Arun catchment. A change in water levels / water quality may affect habitats upon which species rely. Alone LSEs due to changes in water quality and water quantity are expected at: - Mole Gap to Reigate		Forest SAC/SPA and Mole Gap to Reigate Escarpment SAC. - Hydrology impacts at Mole Gap to Reigate Escarpment SAC, Arun Valley SPA/SAC/Ramsar and The Mens SAC.	

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
							Escarpment SAC. - Arun Valley SAP/SAC/Ramsar. - The Mens SAC.			
C	Forge Wood Employment Land	Greenfield		Flexible business	LSEs from the Local Plan alone and in-combination on air quality. European sites vulnerable to air pollution include: - Ashdown Forest SPA and SAC - Mole Gap to Reigate	Allocation is not located within any urbanisation zones of influence. No LSEs expected from this employment allocation.	Allocation is located within River Mole catchment. Site overlaps with Ballast Hole pond and 285m ot the west of the Gatwick Stream. Development will require increased discharges to WwTWs which discharge to the River	This allocation is not located within the Bechstein's bat CSZ of 3km. No LSEs expected alone.	Potential LSEs from all Local Plan allocations combined and in-combination with other plans and projects include: - Air Quality at Ashdown Forest SAC/SPA and Mole Gap to Reigate	Screened in Category I and L.

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
					Escarpment SAC.		Mole. Development is likely to increase pressure on public water supply abstraction from River Arun catchment. A change in water levels / water quality may affect habitats upon which species rely. Alone LSEs due to changes in water quality and water quantity are expected at: - Mole Gap to Reigate		Escarpment SAC. - Hydrology impacts at Mole Gap to Reigate Escarpment SAC, Arun Valley SPA/SAC/Ramsar and The Mens SAC.	

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
							Escarpment SAC. - Arun Valley SAP/SAC/Ramsar. - The Mens SAC.			
D	Rackspace (SE Parcel)	Brownfield (partially built)		Warehouse – data centre	LSEs from the Local Plan alone and in-combination on air quality. European sites vulnerable to air pollution include: - Ashdown Forest SPA and SAC - Mole Gap to Reigate	Allocation is not located within any urbanisation zones of influence. No LSEs expected from this employment allocation.	Allocation is located within River Mole catchment. Development will require increased discharges to WwTWs which discharge to the River Mole. Development is likely to increase pressure on public water supply	This allocation is not located within the Bechstein's bat CSZ of 3km. No LSEs expected alone.	Potential LSEs from all Local Plan allocations combined and in-combination with other plans and projects include: - Air Quality at Ashdown Forest SAC/SPA and Mole Gap to Reigate	Screened in Category I and L.

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
					Escarpment SAC.		abstraction from River Arun catchment. A change in water levels / water quality may affect habitats upon which species rely. Alone LSEs due to changes in water quality and water quantity are expected at: - Mole Gap to Reigate Escarpment SAC. - Arun Valley SAP/SAC/Ramsar.		Escarpment SAC. - Hydrology impacts at Mole Gap to Reigate Escarpment SAC, Arun Valley SPA/SAC/Ramsar and The Mens SAC.	

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
							- The Mens SAC.			
E	Former GSK Site (N & W Parcel)	Brownfield (partially built)		Warehouse – data centre	LSEs from the Local Plan alone and in-combination on air quality. European sites vulnerable to air pollution include: - Ashdown Forest SPA and SAC - Mole Gap to Reigate Escarpment SAC.	Allocation is not located within any urbanisation zones of influence. No LSEs expected from this employment allocation.	Allocation is located within River Mole catchment. Development will require increased discharges to WwTWs which discharge to the River Mole. Development is likely to increase pressure on public water supply abstraction from River Arun catchment. A change in water levels /	This allocation is not located within the Bechstein's bat CSZ of 3km. No LSEs expected alone.	Potential LSEs from all Local Plan allocations combined and in-combination with other plans and projects include: - Air Quality at Ashdown Forest SAC/SPA and Mole Gap to Reigate Escarpment SAC. - Hydrology impacts at Mole Gap to Reigate	Screened in Category I and L.

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
							water quality may affect habitats upon which species rely. Alone LSEs due to changes in water quality and water quantity are expected at: - Mole Gap to Reigate Escarpment SAC. - Arun Valley SAP/SAC/Ramsar. - The Mens SAC.		Escarpment SAC, Arun Valley SPA/SAC/Ramsar and The Mens SAC.	
F(i)	Gatwick Park (Site G1)	Brownfield (offices)		Office	LSEs from the Local Plan alone and in-	Allocation is not located within any urbanisation	Allocation is located within River Mole catchment.	This allocation is not located within the Bechstein's bat	Potential LSEs from all Local Plan allocations	Screened in Category I and L.

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
					combination on air quality. European sites vulnerable to air pollution include: - Ashdown Forest SPA and SAC - Mole Gap to Reigate Escarpment SAC.	zones of influence. No LSEs expected from this employment allocation.	Allocation 149m to the east of Crowter's Brook. Development will require increased discharges to WwTWs which discharge to the River Mole. Development is likely to increase pressure on public water supply abstraction from River Arun catchment. A change in water levels / water quality may affect	CSZ of 3km. No LSEs expected alone.	combined and in-combination with other plans and projects include: - Air Quality at Ashdown Forest SAC/SPA and Mole Gap to Reigate Escarpment SAC. - Hydrology impacts at Mole Gap to Reigate Escarpment SAC, Arun Valley SPA/SAC/Ramsar and The Mens SAC.	

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
							habitats upon which species rely. Alone LSEs due to changes in water quality and water quantity are expected at: - Mole Gap to Reigate Escarpment SAC. - Arun Valley SAP/SAC/Ramsar. - The Mens SAC.			
F(ii)	Gatwick Park (Site G2)	Brownfield (car showroom)		Office	LSEs from the Local Plan alone and in-combination on air quality.	Allocation is not located within any urbanisation zones of influence. No	Allocation is located within River Mole catchment. Development will require	This allocation is not located within the Bechstein's bat CSZ of 3km.	Potential LSEs from all Local Plan allocations combined and in-	Screened in Category I and L.

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
					European sites vulnerable to air pollution include: - Ashdown Forest SPA and SAC - Mole Gap to Reigate Escarpment SAC.	LSEs expected from this employment allocation.	increased discharges to WwTWs which discharge to the River Mole. Development is likely to increase pressure on public water supply abstraction from River Arun catchment. A change in water levels / water quality may affect habitats upon which species rely. Alone LSEs due to changes in	No LSEs expected alone.	combination with other plans and projects include: - Air Quality at Ashdown Forest SAC/SPA and Mole Gap to Reigate Escarpment SAC. - Hydrology impacts at Mole Gap to Reigate Escarpment SAC, Arun Valley SPA/SAC/Ramsar and The Mens SAC.	

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
							water quality and water quantity are expected at: - Mole Gap to Reigate Escarpment SAC. - Arun Valley SAP/SAC/Ramsar. - The Mens SAC.			
G	Elekta (Phase 2)	Brownfield		Office	LSEs from the Local Plan alone and in-combination on air quality. European sites vulnerable to air pollution include:	Allocation is not located within any urbanisation zones of influence. No LSEs expected from this employment allocation.	Allocation is located within River Mole catchment. Development will require increased discharges to WwTWs which discharge to the River	This allocation is not located within the Bechstein's bat CSZ of 3km. No LSEs expected alone.	Potential LSEs from all Local Plan allocations combined and in-combination with other plans and projects include:	Screened in Category I and L.

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
					- Ashdown Forest SPA and SAC - Mole Gap to Reigate Escarpment SAC.		Mole. Development is likely to increase pressure on public water supply abstraction from River Arun catchment. A change in water levels / water quality may affect habitats upon which species rely. Alone LSEs due to changes in water quality and water quantity are expected at: - Mole Gap to Reigate		- Air Quality at Ashdown Forest SAC/SPA and Mole Gap to Reigate Escarpment SAC. - Hydrology impacts at Mole Gap to Reigate Escarpment SAC, Arun Valley SPA/SAC/Ramsar and The Mens SAC.	

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
							Escarpment SAC. - Arun Valley SAP/SAC/Ramsar. - The Mens SAC.			
H	Land at Jersey Farm (Site A)	Greenfield		Industrial/ warehouse	LSEs from the Local Plan alone and in-combination on air quality. European sites vulnerable to air pollution include: - Ashdown Forest SPA and SAC - Mole Gap to Reigate	Allocation is not located within any urbanisation zones of influence. No LSEs expected from this employment allocation.	Allocation is located within River Mole catchment. Development will require increased discharges to WwTWs which discharge to the River Mole. Development is likely to increase pressure on public water supply	This allocation is not located within the Bechstein's bat CSZ of 3km. No LSEs expected alone.	Potential LSEs from all Local Plan allocations combined and in-combination with other plans and projects include: - Air Quality at Ashdown Forest SAC/SPA and Mole Gap to Reigate	Screened in Category I and L.

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
					Escarpment SAC.		abstraction from River Arun catchment. A change in water levels / water quality may affect habitats upon which species rely. Alone LSEs due to changes in water quality and water quantity are expected at: - Mole Gap to Reigate Escarpment SAC. - Arun Valley SAP/SAC/Ramsar.		Escarpment SAC. - Hydrology impacts at Mole Gap to Reigate Escarpment SAC, Arun Valley SPA/SAC/Ramsar and The Mens SAC.	

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
							- The Mens SAC.			
I	Sites XA1 and XA2 Sussex Manor	(Brownfield) Extension to existing building		Warehouse	LSEs from the Local Plan alone and in-combination on air quality. European sites vulnerable to air pollution include: - Ashdown Forest SPA and SAC - Mole Gap to Reigate Escarpment SAC.	Allocation is not located within any urbanisation zones of influence. No LSEs expected from this employment allocation.	Allocation is located within River Mole catchment. Crowter's Brook runs along site's western boundary. Development will require increased discharges to WwTWs which discharge to the River Mole. Development is likely to increase pressure on public water supply abstraction	This allocation is not located within the Bechstein's bat CSZ of 3km. No LSEs expected alone.	Potential LSEs from all Local Plan allocations combined and in-combination with other plans and projects include: - Air Quality at Ashdown Forest SAC/SPA and Mole Gap to Reigate Escarpment SAC. - Hydrology impacts at Mole Gap to Reigate	Screened in Category I and L.

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
							from River Arun catchment. A change in water levels / water quality may affect habitats upon which species rely. Alone LSEs due to changes in water quality and water quantity are expected at: - Mole Gap to Reigate Escarpment SAC. - Arun Valley SAP/SAC/Ramsar.		Escarpment SAC, Arun Valley SPA/SAC/Ramsar and The Mens SAC.	

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
							- The Mens SAC.			
J	Tilgate Forest Business Park	Vacant Brownfield		Office	LSEs from the Local Plan alone and in-combination on air quality. European sites vulnerable to air pollution include: - Ashdown Forest SPA and SAC - Mole Gap to Reigate Escarpment SAC.	Allocation is not located within any urbanisation zones of influence. No LSEs expected from this employment allocation.	Allocation is located within River Mole catchment. Development will require increased discharges to WwTWs which discharge to the River Mole. Development is likely to increase pressure on public water supply abstraction from River Arun catchment. A change in water levels /	This allocation is not located within the Bechstein's bat CSZ of 3km. No LSEs expected alone.	Potential LSEs from all Local Plan allocations combined and in-combination with other plans and projects include: - Air Quality at Ashdown Forest SAC/SPA and Mole Gap to Reigate Escarpment SAC. - Hydrology impacts at Mole Gap to Reigate	Screened in Category I and L.

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
							water quality may affect habitats upon which species rely. Alone LSEs due to changes in water quality and water quantity are expected at: - Mole Gap to Reigate Escarpment SAC. - Arun Valley SAP/SAC/Ramsar. - The Mens SAC.		Escarpment SAC, Arun Valley SPA/SAC/Ramsar and The Mens SAC.	
K	Southways	Brownfield		Office	LSEs from the Local Plan alone and in-	Allocation is not located within any urbanisation	Allocation is located within River Mole catchment.	This allocation is not located within the Bechstein's bat	Potential LSEs from all Local Plan allocations	Screened in Category I and L.

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
					combination on air quality. European sites vulnerable to air pollution include: - Ashdown Forest SPA and SAC - Mole Gap to Reigate Escarpment SAC.	zones of influence. No LSEs expected from this employment allocation.	Development will require increased discharges to WwTWs which discharge to the River Mole. Development is likely to increase pressure on public water supply abstraction from River Arun catchment. A change in water levels / water quality may affect habitats upon which species rely.	CSZ of 3km. No LSEs expected alone.	combined and in-combination with other plans and projects include: - Air Quality at Ashdown Forest SAC/SPA and Mole Gap to Reigate Escarpment SAC. - Hydrology impacts at Mole Gap to Reigate Escarpment SAC, Arun Valley SPA/SAC/Ramsar and The Mens SAC.	

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
							Alone LSEs due to changes in water quality and water quantity are expected at: - Mole Gap to Reigate Escarpment SAC. - Arun Valley SAP/SAC/Ramsar. - The Mens SAC.			
O	Land at Station Hill	Brownfield (vacant amenity land adj to railway)		Office	LSEs from the Local Plan alone and in-combination on air quality. European sites vulnerable to	Allocation is not located within any urbanisation zones of influence. No LSEs expected from this	Allocation is located within River Mole catchment. Development will require increased discharges to WwTWs	This allocation is not located within the Bechstein's bat CSZ of 3km. No LSEs expected alone.	Potential LSEs from all Local Plan allocations combined and in-combination with other plans and	Screened in Category I and L.

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
					air pollution include: - Ashdown Forest SPA and SAC - Mole Gap to Reigate Escarpment SAC.	employment allocation.	which discharge to the River Mole. Development is likely to increase pressure on public water supply abstraction from River Arun catchment. A change in water levels / water quality may affect habitats upon which species rely. Alone LSEs due to changes in water quality and water		projects include: - Air Quality at Ashdown Forest SAC/SPA and Mole Gap to Reigate Escarpment SAC. - Hydrology impacts at Mole Gap to Reigate Escarpment SAC, Arun Valley SPA/SAC/Ramsar and The Mens SAC.	

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
							quantity are expected at: - Mole Gap to Reigate Escarpment SAC. - Arun Valley SAP/SAC/Ramsar. - The Mens SAC.			
	Gatwick Green Strategic Employment Allocation	Greenfield		Employment – industrial and warehousing.	LSEs from the Local Plan alone and in-combination on air quality. European sites vulnerable to air pollution include: - Ashdown Forest SPA and SAC	Allocation is not located within any urbanisation zones of influence. No LSEs expected from this employment allocation.	Allocation is located within River Mole catchment. Development will require increased discharges to WwTWs which discharge to the River Mole. Development	This allocation is not located within the Bechstein's bat CSZ of 3km. No LSEs expected alone.	Potential LSEs from all Local Plan allocations combined and in-combination with other plans and projects include: - Air Quality at Ashdown Forest	Screened in Category I and L.

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
					- Mole Gap to Reigate Escarpment SAC.		is likely to increase pressure on public water supply abstraction from River Arun catchment. A change in water levels / water quality may affect habitats upon which species rely. Alone LSEs due to changes in water quality and water quantity are expected at: - Mole Gap to Reigate		SAC/SPA and Mole Gap to Reigate Escarpment SAC. - Hydrology impacts at Mole Gap to Reigate Escarpment SAC, Arun Valley SPA/SAC/Ramsar and The Mens SAC.	

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
							Escarpment SAC. - Arun Valley SAP/SAC/Ramsar. - The Mens SAC.			
Gypsy and Traveller										
	Buchan Park Kennels	Greenfield	29067.13781050000	10 pitches	LSEs from the Local Plan alone and in-combination on air quality. European sites vulnerable to air pollution include: - Ashdown Forest SPA and SAC - Mole Gap to Reigate	Allocation not located with zone of influence. No LSE.	Allocation is located within River Mole catchment. Development will require increased discharges to WwTWs which discharge to the River Mole. Development is likely to increase pressure on	This allocation is not located within the Bechstein's bat CSZ of 3km. No LSEs expected alone.	Potential LSEs from all Local Plan allocations combined and in-combination with other plans and projects include: - Air Quality at Ashdown Forest SAC/SPA and Mole Gap to	Screened in Category I and L.

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
					Escarpment SAC.		public water supply abstraction from River Arun catchment. A change in water levels / water quality may affect habitats upon which species rely. Alone LSEs due to changes in water quality and water quantity are expected at: - Mole Gap to Reigate Escarpment SAC.		Reigate Escarpment SAC. - Hydrology impacts at Mole Gap to Reigate Escarpment SAC, Arun Valley SPA/SAC/Ramsar and The Mens SAC.	

Site Ref Number	Site Name	Current site use	Area (sqm)	Housing number / proposed employment use	Air quality Impact	Public Access and Disturbance (recreation and urbanisation imapctrs)	Hydrological link to a European site	Habitat loss / fragmentation	In-combination effect	Screening conclusion
							- Arun Valley SAP/SAC/Ramsar. - The Mens SAC.			

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Habitat Regulations Assessments

Sustainability Appraisals

Strategic Environmental Assessments

Landscape Character Assessments

Landscape and Visual Impact Assessments

Green Belt Reviews

Expert Witness

Ecological Impact Assessments

Habitat and Ecology Surveys

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LEPUS CONSULTING

LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY

© Lepus Consulting Ltd

1 Bath Street Cheltenham GL50 1YE

T: 01242 525222

E: enquiries@lepusconsulting.com

www.lepusconsulting.com

CHELTENHAM

Lepus Consulting
1 Bath Street
Cheltenham
Gloucestershire GL50 1YE

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