

Crawley Borough Council

Habitats Regulations Assessment Screening Report

of the Crawley Borough Local Plan Review

January 2020

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Crawley Borough Council Habitats Regulations Assessment Screening Report of the Crawley Borough Local Plan Review (January 2020)

1. Introduction

- 1.1 The purpose of a Habitat Regulations Assessment is to assess the impacts of a land-use plan against the conservation objectives of sites protected by European law. The assessment must determine whether the Local Plan would adversely affect the integrity of the sites in terms of their nature conservation objectives. Where negative effects are identified, other options should be examined to avoid any potential damaging effects.
- 1.2 Whilst there are no European Sites within Crawley, there are three sites within 15 kilometres of the borough's boundaries and possibly others further afield that could be affected by development within Crawley. The council has produced this Habitat Regulations Scoping Report to consider the impact of the Local Plan on the conservation objectives of these sites.
- 1.3 It is intended that the Habitat Regulations Assessment (HRA) will be used to identify any necessary changes (in the form of modifications to policy, alternatives or mitigation) to the Plan.

2. Background

- 2.1 Article 6(3) of the European Habitats Directive requires an 'Appropriate Assessment' of plans that could affect Special Areas of Conservation for habitats (SACs) or Special Protection Areas for birds (SPAs) – often referred to jointly as "European Sites" or "Natura 2000 Sites".
- 2.2 Each European Site has a number of qualifying features for which conservation objectives have been developed. The purpose of a HRA is to assess the impacts of a land-use plan against these conservation objectives. Where negative effects are identified, other options should be examined to avoid any potential damaging effects.
- 2.3 The Habitats Directive applies the precautionary principle to the European Sites. Plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the site(s) in question. Plans and projects may still be permitted if there are no alternatives to them and there are imperative reasons of overriding public interest as to why they should go ahead.

Methodology

- 2.4 Draft guidance was published by the Department for Communities and Local Government (DCLG) in 2006¹ which recommends a three-stage process to undertaking HRA:
 1. Screening – Initial view of whether the plan either alone or in combination with other plans or projects is likely to have a significant effect on a European Site;
 2. Appropriate Assessment – A more detailed study of whether, in view of the Site's conservation objectives, the Plan either alone or in combination with other plans or projects would have an adverse effect (or risk of this) on the integrity of the site. If not, the Plan can proceed.
 3. Mitigation and Alternatives – Where the Plan is assessed as having an adverse effect (or risk of this) on the integrity of a site, there should be an examination of mitigation measures and alternative solutions. If it is not possible to identify mitigation and/or alternatives, it will be necessary to

¹ Planning for the Protection of European Sites: Appropriate Assessment (2006) DCLG

establish the ‘imperative reasons of overriding public interest’. This is not considered a standard part of the process and will only be carried out in exceptional circumstances.

- 2.5 All three stages of the process are referred to cumulatively as the Habitat Regulations Assessment. Stage 2 is referred to as the “Appropriate Assessment”, in order to clearly distinguish it from the whole process. This document covers Stage 1: “Screening”.

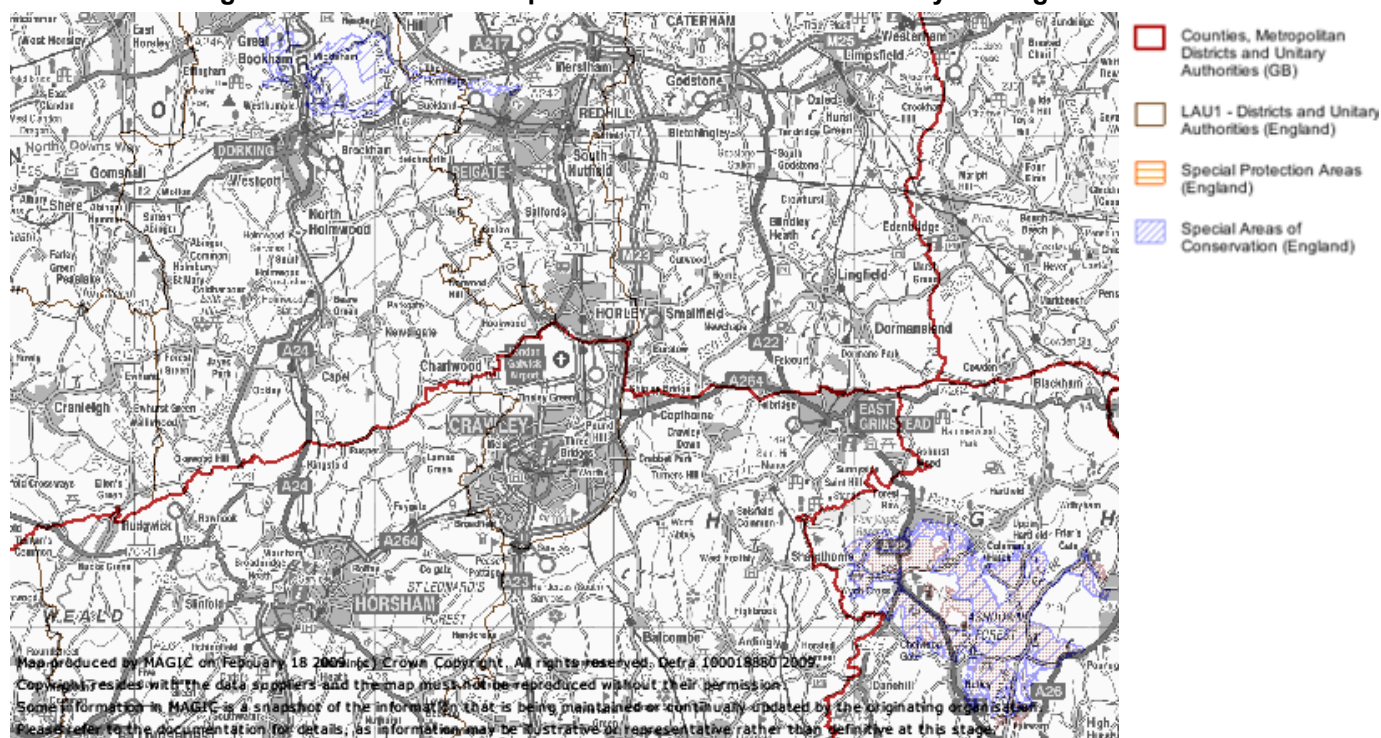
Screening

- 2.6 The principal aim of this document is to ‘screen’ the potential of the Local Plan to have an adverse effect (or risk of this), either alone or in combination with other plans, on European Sites. This document identifies:
- Those European Sites at greatest risk of being affected by the Local Plan;
 - The possible effects of the Local Plan on those sites;
 - Plans that could affect the European Sites ‘in combination’ with the Local Plan;
 - Screening and appraisal of potential risks to environmentally protected features; and
 - Further consideration of the possible impacts and further work needed.

3. European Sites

- 3.1 There are no European Sites within Crawley itself. However, three European Sites fall within 15 kilometres of Crawley’s borough boundaries. A map showing the location of these sites in relation to Crawley is provided below in Figure 1.

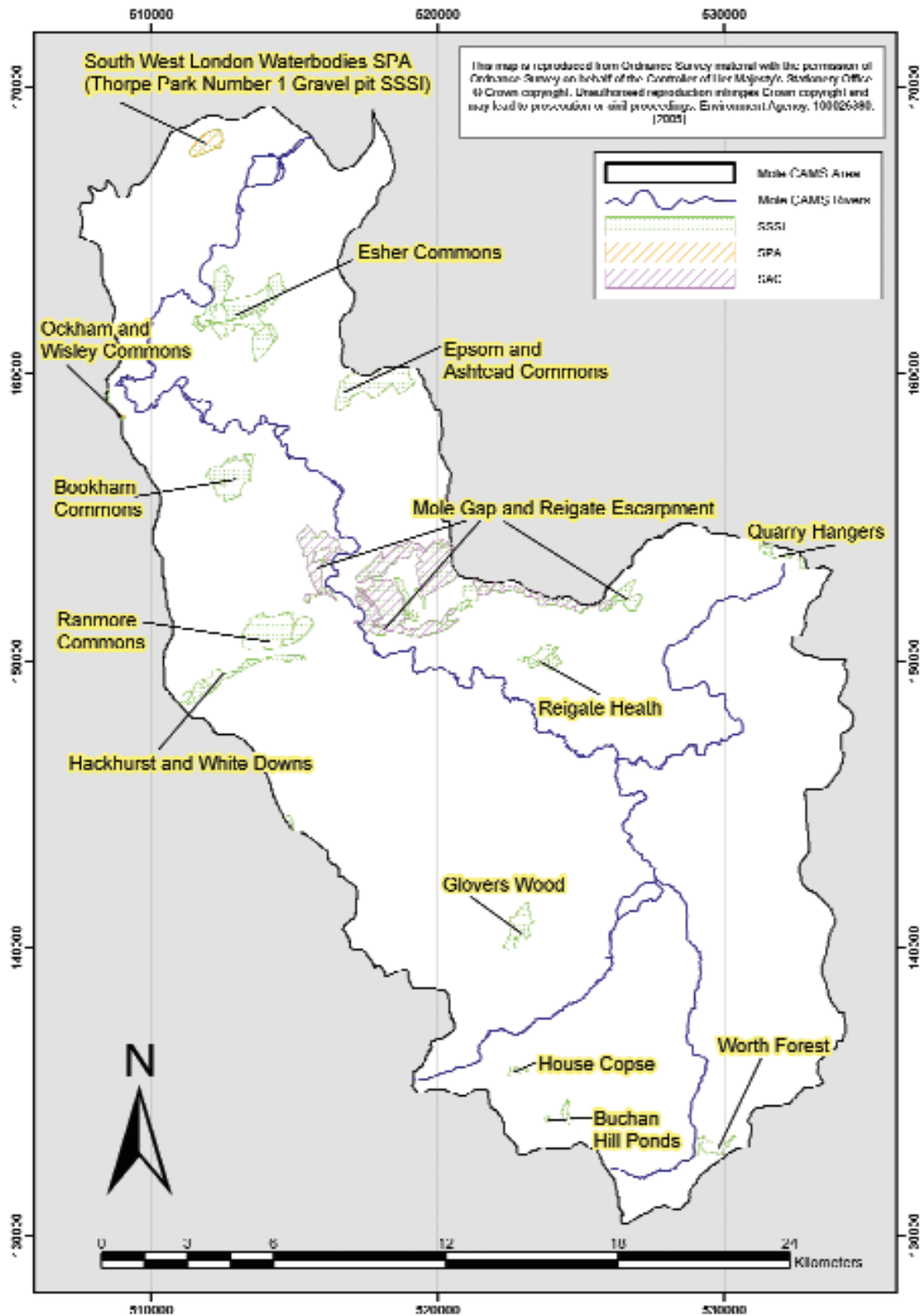
Figure 1: Location of European Sites in Relation to Crawley Borough’s Boundaries



- 3.2 Furthermore, the council is aware that the Local Plan could potentially have a significant impact on European Sites beyond the 15km buffer; for instance where the water system ‘downstream’ of Crawley passes through European Sites. A number of sites were considered in order to inform this Habitat

Regulations Assessment (set out in Figure 2). However, only one was identified as potentially being affected.

Figure 2: European Sites and SSSI in the River Mole Catchment Area



3.3 The European Sites identified for the purposes of this HRA are set out below in Table 1.

Table 1: European Sites within 15km of Crawley/beyond 15km ‘downstream’ of Crawley

Name of Site	Approx. distance from Crawley	Reasons for Designation
Ashdown Forest SAC	Straight line: 10km By Road: 12km	<ul style="list-style-type: none"> • Wet heathland with cross-leaved heath • Dry heaths • Great Crested Newts
Mole Gap to Reigate Escarpment SAC	Straight line: 10km By Road: 11km	<ul style="list-style-type: none"> • Natural box scrub • Dry grasslands and scrublands on chalk or limestone, including important orchid sites • Yew-dominated woodland • Dry heaths • Beech forwards on neutral to rich soils • Great Crested Newt • Bechstein’s Bat
Ashdown Forest SPA	Straight line: 10km By Road: 12km	Populations of European importance of: <ul style="list-style-type: none"> • Nightjar • Dartford Warbler
South West London Waterbodies SPA	Straight line: 30km By Road: 32.7km	Internationally important wintering populations of: <ul style="list-style-type: none"> • <i>Anas clypeata</i> (Northern Shovler) and • <i>Anas strepera</i> (Gadwell)

3.4 Appendix A shows the Special Areas of Conservation and Special Protection Areas around Crawley and the Coast to Capital Local Enterprise Partnership (LEP) area, along with their associated 15m and 7m buffer zones.

4. The Local Plan Review

4.1 The Crawley Borough Local Plan was adopted in 2015. As part of this, the council undertook the formal process HRA Screening². Potential impacts of the Local Plan were identified to be in the form of:

- Increased traffic – leading to increased air pollution, which would 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.

4.2 Evidence was gathered to secure the position concluded in the Screening Report that the possible effects of the Local Plan will not have a significant impact (either on their own or ‘in combination’ with other plans) on the three European Sites, primarily due to their distance from the borough’s boundaries. This evidence included the council’s transport modelling³ and advice from Natural England (see Appendix B). As the screening showed that likely significant effects could be excluded there was no requirement to

² Habitat Regulations Assessment of the Crawley Borough Local Plan: Screening Report for Consultation with the Submission Local Plan (November 2013) CBC [LP009 Crawley Submission Local Plan Habitat Regulations Screening Report](#)

³ [LP119 Transport Modelling](#) (2012) Amey Consulting Stage 1
[LP120 Transport Modelling](#) (2014) Amey Consulting Stage 2

proceed to Appropriate Assessment which is the next stage in the HRA process.

Crawley Borough Local Plan 2035

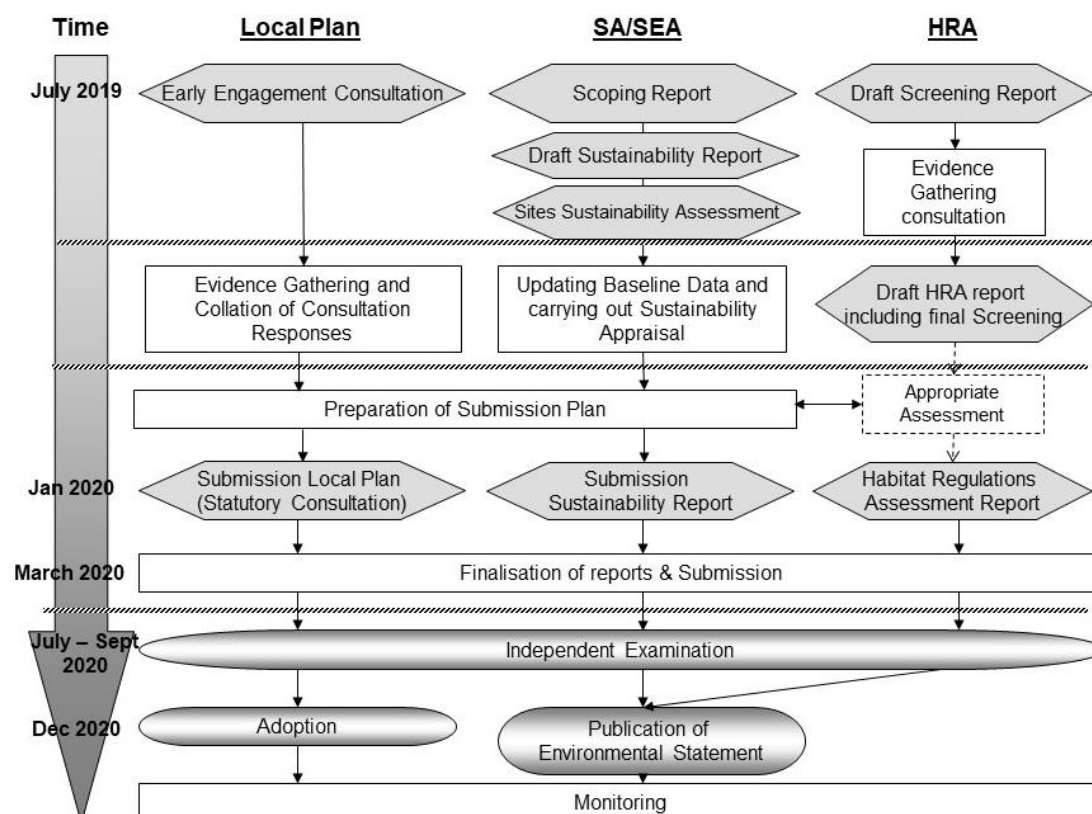
4.3 The Crawley Borough Local Plan Review is taking place as the adopted Plan reaches its five year date. The Local Plan Review is currently at the Regulation 19 Stage of Public Consultation. For this consultation, the draft Submission Local Plan, which the council considers to be its ‘sound’ Plan for the borough has been prepared for scrutiny in advance of its Submission to the Secretary of State for Independent Examination. The timetable for the Local Plan preparation is set out in Table 2 below.

Table 2: Local Plan Development Timetable

Key Milestone	Anticipated Programme Date
Early Engagement Consultation	15 July – 16 September 2019
Submission Consultation	20 January – 2 March 2020
Submission	March 2020
Examination (estimated)	July – September 2020
Adoption	December 2020

4.4 The parallel, and iterative, relationship with the Plan document itself, the Sustainability Appraisal/Strategic Environmental Assessment and the HRA is illustrated in Figure 3.

Figure 3: SA/SEA and HRA production with the Local Plan



- 4.5 The Review will result in the Plan period extending from 2020 to 2035 (five years beyond the end date of the currently adopted Plan 2015 – 2030). Subsequently, relevant data and policies are being refreshed to reflect the most up-to-date position. However, much of the Plan will remain the same, and the broad principles imbedded in the adopted Plan continue into the review draft.
- 4.6 It is expected that the Local Plan Review will have to provide for:
- At least 4,800 new homes: 80% of which will be coming forward within Forge Wood and Crawley town centre combined.
 - At least 11.75ha of employment land for business uses.
 - Anticipated growth at Gatwick Airport, much of which can occur outside of the Local Plan's control.
 - The protection and enhancement of the borough's environmental assets, including securing a net gain in biodiversity.
- 4.7 It is anticipated the potential impacts arising from the review Local Plan are likely to continue to be those anticipated for the adopted Local Plan (see paragraph 4.1). The Screening Reports are set out in Appendix C.

Air Pollution

- 4.8 It is likely that the development to be included in Crawley's Local Plan would increase emissions from traffic and buildings, as well as energy requirements (and thus pollution from power stations). However, it is impossible to clearly show the link between this relatively modest level of development and air quality levels at the three European Sites, which are all 10km from the borough's boundaries.
- 4.9 Therefore, it is recommended that diffuse air pollution issues should be screened out for the purposes of this assessment. Where significant localised effects are identified, then these should be assessed at the local level as part of the Sustainability Appraisal (or HRA) of more detailed Local Development Documents and/or site Environmental Impact Statements (EIA). The current Sustainability Appraisal for the Local Plan does make an initial assessment of air pollution for specific sites that have been allocated in the Local Plan.

Recreation Pressure

- 4.10 The recreation impacts on the Ashdown Forest Special Protection Area (SPA) and Special Area of Conservation (SAC) is considered up to 7km and Crawley is 10km away. The Mole Gap to Reigate Escarpment SAC is also appropriately 10km from the borough's boundaries in a straight line. HRA screening for the adopted Local Plan found that very few Crawley residents visit the Ashdown Forest SPA and SAC or the Mole Gap to Reigate Escarpment SAC, so it concluded that the impact of new development is negligible and could be screened out⁴.
- 4.11 The low numbers of Crawley residents visiting these sites reflects the fact that there are many alternative locations for recreational activity both within and adjacent to the borough. The most notable resource for Crawley residents is Tilgate Park, a highly regarded semi natural park, immediately adjoining the town and covering approximately 90 hectares. The borough's open space study identified that provision of natural and semi-natural green space within the borough is equivalent to a local provision of 2.83 ha per 1000 population.

⁴ Habitat Regulations Assessment of the Crawley Borough Local Plan: Screening Report for Consultation with the Submission Local Plan, paragraphs 8.4-8.14 (November 2013) [CBC LP009 Crawley Submission Local Plan Habitat Regulations Screening Report](#)

This compares favorably to Natural England's recommended standard of 2.0 ha per 1000.

Water Levels

- 4.12 The Environment Agency's abstraction consent process should avoid impacts to water levels. Such impacts will also be dealt with, as a default measure, by the Local Plan which requires all new development in Crawley to minimise its impact on the already serious water stress in the region. Indeed, all new dwellings must meet the current tightest water efficiency standards set out in the Building Regulations 'Optional' Requirement, of 110 litres/person/day, and as part of the Local Plan Review the council is consulting on setting a more challenging target of 100 l/p/d, and for significant scale development an even tighter water efficiency standard of 80 l/p/d will be explored. For commercial development, the minimum standards for BREEAM 'Excellent' within the Water category is required.

Water Quality

- 4.13 The Environment Agency's discharge consent process should not permit development that leads to degraded river conditions. Nevertheless, there is a risk of cumulative impacts on river water quality due to general development and increased run off from hard standings. Pre-treatment of wastewater from new developments that ultimately discharges into the River Mole could avoid water quality impacts.

Air Quality due to Traffic Impacts on the Ashdown Forest

- 4.14 The other potential impact on Ashdown Forest from the development of the Plan is from air pollution arising from traffic induced on roads. A significant proportion of Crawley's workforce commutes to the borough from outside its administrative boundaries. Some of this traffic will result in additional vehicle trips on the roads through the Forest – significantly the A22.
- 4.15 The HRA Screening Assessment undertaken in 2013 for the adopted Crawley Borough Local Plan concluded that all the development options at that time planned for within the Local Plan would not cause significant traffic flow impacts, or reductions in air quality, on routes through the Ashdown Forest. This was based on the conclusions from the Stage 2 of the CBC Local Plan Transport Strategy⁵ (Amey 2014).
- 4.16 Paragraphs 5.6.6 – 5.6.8 of the Stage 2 Report confirm that with the preferred strategy there would be a general reduction in AADT flows around Ashdown Forest relative to the reference case, except on the A22 where there would be a slight increase of less than 50 vehicles per day (2-way). The changes in flow in the area of interest would be insignificant and markedly less than the 1,000 vehicle AADT threshold. In the alternative strategy, there would also be fairly insignificant changes in AADT flow around Ashdown Forest. There would be modest increases in flow on A22 and A26 of less than 200 vehicles per day, relative to the reference case, but these would be well below the 1,000 vehicle AADT threshold. The increases in the alternative scenario were considered to probably reflect the larger amount of development and associated trips in the alternative strategy. It was concluded (in paragraph 5.6.8 and 6.1.18) that it is evident that the Crawley Local Plan would not cause traffic flows on the key routes to impact significantly upon Ashdown Forest. Table 3 is an extract from the Stage 2 report, showing the resulting flows on the Ashdown Forest routes for the forecast scenarios as compared to the Reference Case.

Table 3: Extract from CBC Local Plan Transport Strategy, Stage 2 Report (2014) Amey

Table 13: Daily Traffic Impact on Ashdown Forest Highway Routes 2029			
Two-Way Annual Average Daily Traffic Flow (Vehicles)			
Road Link Section	Reference Case	Preferred Strategy	Alternative Strategy
Two-Way Annual Average Daily Traffic Flow (Vehicles)			
A275	6608	6486	6586
A22	5965	6005	6144
A26	3962	3902	4017
B2110	2623	2503	2614
Two-Way AADT Change from Reference Case (Vehicles)			
A275	-	-122	-22
A22	-	40	180
A26	-	-60	55
B2110	-	-120	-9

- 4.17 This view wasn't challenged by representors. The Inspector's initial questions considered whether the Crawley Borough Local Plan had been the subject of suitably comprehensive and satisfactory Appropriate Assessment under the Habitats Regulations. CBC's Response to the Inspector's Matters Issues and Questions – Matter 1: Legal Compliance and Procedural Matters⁶ provides the council's position in relation to this. Paragraph 114 of the Inspector's final report⁷ concluded that the Plan was compliant with the legal requirements, including whether an Appropriate Assessment was needed. The Local Plan was subsequently adopted in December 2015. However, it was based on the same approach (as advised by Natural England at the time) as the Lewes/South Downs Joint Core Strategy, in relation to the 'in combination' effects (see paragraph 5.1 below).

5. In Combination Effects

- 5.1 In March 2017, a legal challenge on the Lewes/South Downs Joint Core Strategy found that they did not undertake an assessment "in combination" with other plans projects (i.e. other local plans). It was concluded that if they had done so they would have found that the combined increase in traffic movements would have triggered the need for further assessment work as the critical load of 1000 vehicle movements per day had been reached. This has changed the manner in which 'in combination' effects are considered since the previous adopted Local Plan.
- 5.2 The key issue relates to new development and its associated increases in traffic flows on roads close to the SAC heathland which is vulnerable to air pollution. The heathland habitat and its population of great crested newts is the reason for the Special Area of Conservation designation.

⁶ [CBC001 Written Statement Matter 1 CBC001 Written Statement Matter 1 Appendices](#)

⁷ [Inspector's Report into the Crawley Borough](#)

- 5.3 Whilst the Crawley Transport Model in 2013 used specific inputs of data for Crawley and Horsham rural districts, TEMPRO was used for the following areas of West and East Sussex⁸:
- Chichester
 - Arun
 - Horsham
 - Adur
 - Worthing
 - Mid Sussex
 - East Sussex; and
 - Crawley.
- 5.4 Overall housing numbers within the Mid Sussex District Plan and Horsham District Planning Framework increased through their examination process, from those included within the modelling for the adopted Crawley Borough Local Plan. Both Authorities are updating their own transport modelling to support their plan preparation (the Horsham Local Plan Review and the Mid Sussex Site Allocations DPD). In addition, Brighton and Hove City Plan Part 1 and the Arun Local Plan both have been adopted with a higher housing target. Appendix D sets out the most recent understanding of planned development levels in areas close to Crawley.
- 5.5 Since the ruling, joint working over a large area, and across many planning authorities, has been progressed in relation to understanding the potential impacts on the integrity of the Ashdown Forest SAC as a result of development pressure. This has sought to ensure that the 'in combination' effects of various development plans (specifically their traffic impacts) on the Ashdown Forest are sufficiently mitigated. This has been undertaken through the Ashdown Forest Working Group⁹, which has the shared objective of sharing evidence and ensuring that impacts on the Ashdown Forest have been properly assessed through HRA. A Statement of Common Ground relating to this matter has been signed by 11 local authorities across the sub-region and Natural England¹⁰. Wealden District Council (within which the Ashdown Forest is located) took part in the preparation of, but did not sign, the Statement of Common Ground.
- 5.6 The following Local Authorities have considered/are considering the Habitat Regulation Assessment requirements as part of their Plan-making processes in light of the legal judgement in relation to the "in combination" effects:
- Mid Sussex District Council (District Plan, adopted March 2018)
 - South Downs National Park Authority (adopted July 2019)
 - Tandridge District Council (submitted January 2019)
 - Wealden District Council (submitted January 2019)
 - Mid Sussex District Council (Site Allocations DPD Regulation 18, anticipated Summer/Autumn 2019)

⁸ Crawley Borough Council Local Plan Transport Strategy, para. 4.3.1 – 4.3.4, page 22 (2014) Amey

⁹ Membership includes: Brighton and Hove City Council, Crawley BC, East Sussex CC, Hastings BC, Horsham DC, Lewes & Eastbourne Councils, Mid Sussex DC, Natural England, Rother DC, Sevenoaks DC, South Downs National Park Authority, Tandridge DC, Tonbridge & Malling DC, Tunbridge Wells BC, Wealden DC, West Sussex CC,

¹⁰ Most recently used for the South Down National Park Local Plan examination (April 2018) signed by Crawley Borough Council, East Sussex CC, Lewes and Eastbourne Councils, Mid Sussex DC, Natural England, Rother DC, Sevenoaks DC, South Downs National Park Authority, Tandridge DC, Tunbridge Wells BC, West Sussex CC.

Mid Sussex District Plan

- 5.7 The Mid Sussex District Plan was subject to Appropriate Assessment in relation to the initial housing target of 876 dwellings per annum¹¹. The evidence to support the District Plan concluded that there would be a net reduction in traffic through Ashdown Forest roads, although it indicated a potential increase of 267 AADT on the A275 (see extract in Figure 2 below).
- 5.8 On this basis, an Appropriate Assessment was undertaken to consider the Air Quality Modelling and ecological interpretation for Habitats Regulations Assessment to test the increase in traffic flows on the A275 as a result of development on the Ashdown Forest SAC. This Appropriate Assessment concluded that the effect of additional traffic on the A275 does not result in adverse effects on the ecological integrity of the qualifying Ashdown Forest SAC habitats as the effect of the District Plan's contribution to nitrogen deposits is neutral.
- 5.9 Confirmation was provided by WSCC Highways Authority (by email dated 24 January 2018) that the Mid Sussex Transport Study forecasting spreadsheets included the following totals for Crawley:

Dwellings	
Crawley North East Sector	1900
Planned Growth 2008-2031 Reference Case and Development Cases	6908
Residual Growth for NTEM Alternative Planning Assumption 2008-2031 Reference and Development Cases	5008
Jobs	
Crawley North East Sector	180
Planned Growth 2008-2031 Reference Case and Development Cases	10450
Residual Growth for NTEM Alternative Planning Assumption 2008-2031 Reference and Development Cases	10270

- 5.10 In each case, the Planned Growth figure is the total for the borough from which the Crawley North East Sector (Forge Wood) figure is modelled separately and the Residual Growth figure spread among the traffic zones representing the Crawley NTEM district. (NTEM = National Trip End Model). It was confirmed that the Mid Sussex work will not have identified the Crawley development as a net impact as it is included in the reference case scenarios.

Tandridge District Local Plan

- 5.11 Tandridge District Council commissioned a Strategic Highways Assessment to be undertaken to support the preparation of their Local Plan. This has included the use of TEMPRO for all districts and borough's outside of Tandridge. The network changes to be delivered as part of the Forge Wood development have been incorporated into the model.

¹¹ The 'stepped trajectory' higher figure for later years in the Mid Sussex District Plan (1,090 dwellings per annum from 2024/25 to 2030/31) is to be considered by further HRA as part of the Site Allocations Development Plan Document and the Review of the District Plan.

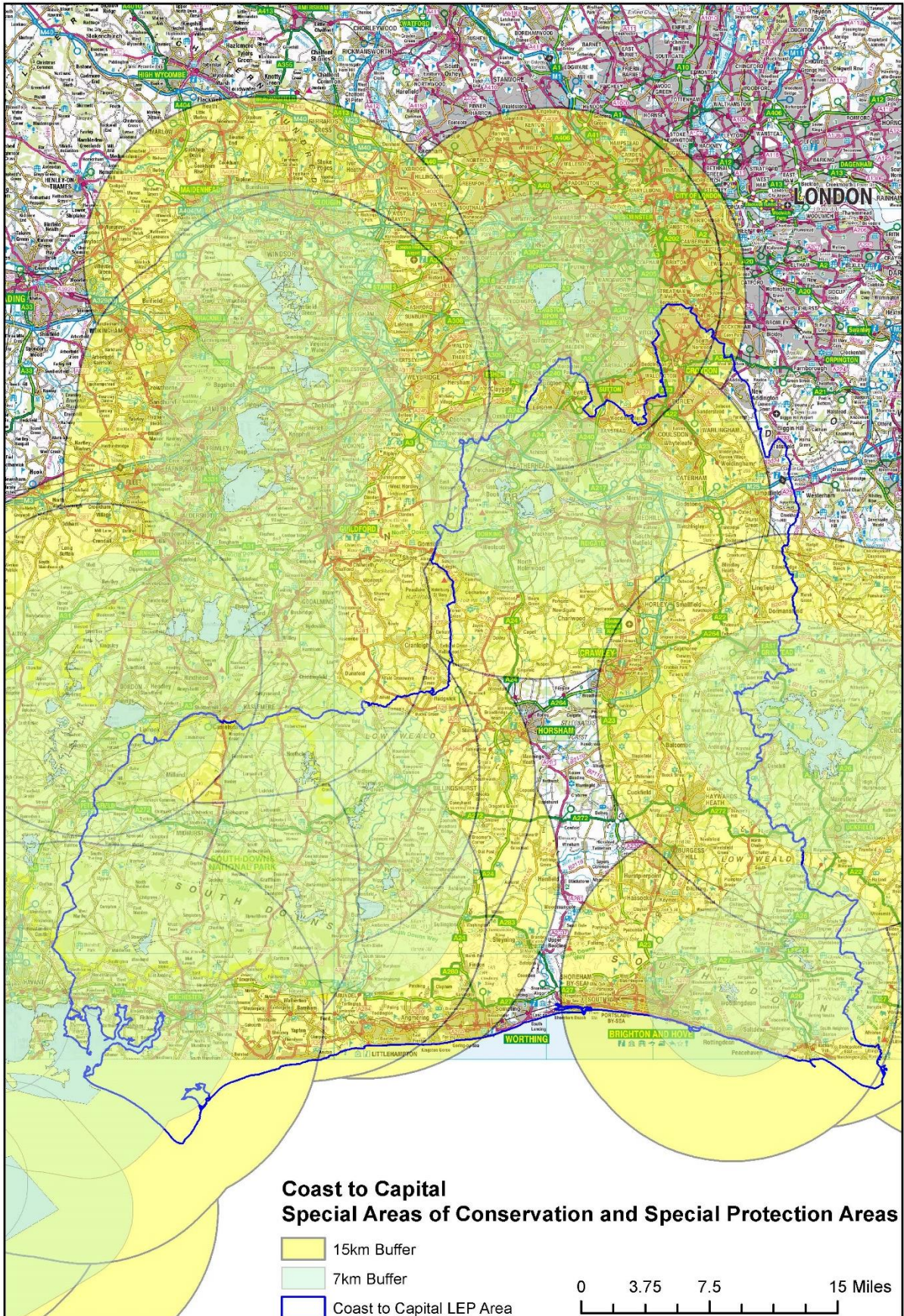
6. Conclusions of the Habitat Regulations Assessment Screening Report

- 6.1 The council believes that the Screening Report prepared for the adopted Local Plan continues to apply to the Review.
- 6.2 However, due to the revised position in relation to 'in combination' effects, along with the changes to proposed development levels anticipated since the Local Plan's adoption in 2015, there is a need to undertake further investigation to fully understand the possible impacts on the European Sites from the Local Plan Review both on its own and in combination with other Plans.
- 6.3 In particular, this is critical in relation to the traffic modelling. This is being undertaken following the close of the Local Plan Review Regulation 18 public consultation, and the 'Call for Sites', now a more accurate understanding of development levels and sites has been established for the final submission Plan. Following this it will be possible to understand whether a full Appropriate Assessment should be carried out.

7. Consultation Arrangements

- 7.1 This Screening Report has been published alongside the Crawley Borough Council draft 'Submission' Local Plan, for its Regulation 19 public consultation "Publication", and its accompanying Sustainability Appraisal Report.
- 7.2 Consultation will take place over an eight week period, which commences on 15 July 2019 and concluded on 16 September 2019. All comments received on the Screening Report are welcomed. Should you wish to comment on this document, please do so on or before **5pm 2 March 2020**
- 7.3 Representations can be submitted in the following ways:
- Electronically by email to: forward.plans@crawley.gov.uk
 - By post to:
Strategic Planning
Crawley Borough Council
Town Hall
The Boulevard
Crawley
West Sussex
RH10 1UZ
- 7.4 For further information about the Habitat Regulations Assessment, please contact Elizabeth Bridgen on (01293 438624).
- 7.5 The Habitat Regulation Assessment Screening Report can be viewed on the council's website at www.crawley.gov.uk/crawley2035
- 7.6 Hard copies of the document, along with the draft Local Plan Review and the draft Sustainability Appraisal, are also able to view at:
- Town Hall:** The Boulevard, Crawley, West Sussex, RH10 1UZ. Phone 01293 438000
Opening hours: Monday to Friday 8.30 am - 5.00 pm.
- Crawley Library:** Southgate Avenue, Southgate, Crawley, RH10 6HG.
Phone 01293 651744. Opening hours: Monday to Friday 9.00 am -7.00 pm
Saturday 9.00 am -5.00 pm

APPENDIX A: SPECIAL AREAS OF CONSERVATION AND SPECIAL PROTECTION AREAS



APPENDIX B: CORRESPONDENCE FROM NATURAL ENGLAND ON HABITAT REGULATIONS IN RELATION TO THE CRAWLEY BOROUGH LOCAL PLAN (2013)

Brigden, Elizabeth

From: Lister, John (NE) <John.Lister@naturalengland.org.uk>
Sent: 29 November 2013 12:58
To: Webster, James
Subject: 101590 - Habitats Regulation Assessment for Crawley's Local Plan

Dear James,

Thank you for consulting Natural England on your HRA.

On the basis of the documents to hand, Natural England concurs that your plan is not likely to have significant effect on internationally important wildlife sites, either alone or in combination with other projects and plans.

Yours sincerely,

John Lister

Lead Adviser
Land Use Services Team - Ashford
Natural England

Mobile - 0790 060 8172

www.naturalengland.org.uk

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APPENDIX C: SCREENING REPORTS

- 1. Ashdown Forest SAC**
- 2. Mole Gap to Reigate Escarpment SAC**
- 3. Ashdown Forest SPA**
- 4. South West London Waterbodies SPA**

Screening for Ashdown Forest SAC for the Crawley Local Plan Review (2020 – 2035)						
Site	Qualifying Features	Key Environmental Conditions to Support Site Integrity	Possible Impacts Arising from the Local Plan Review	Is there a Risk of a Significant Effect?	Possible Impacts from Other Trends, Plans etc.	Is there a Significant Risk of 'In Combination' Effects?
Ashdown Forest SAC	<ul style="list-style-type: none"> • Wet Heathland with Cross-Leaved Heath • Dry Heaths • Great Crested Newt 	<ul style="list-style-type: none"> • Minimal Air Pollution (nitrogen deposition can cause compositional changes over time) • Use of grazing management to prevent succession • Balanced hydrological regime to maintain wet heath • Low recreational disturbance • Absence of urbanisation • Suitable foraging and refuge habitat within 500m of ponds • Relatively unpolluted water of roughly neutral pH • Some ponds deep enough to retain water throughout February to August at least one year in every three • Great Crested Newts require good connectivity of landscape features (ponds, hedges etc.) as they often live as metapopulations in a number of ponds. 	Potential air pollution emissions from development and additional traffic	No – the site is 10km away from the administrative boundary of Crawley	Developments in Wealden, Mid Sussex, Tandridge and Sevenoaks could result in increased air pollution	To Be Determined
			New development in Crawley could potentially increase traffic and recreational pressure in the Forest	No – evidence suggests that very few existing Crawley residents access the site on a regular basis	Developments in Wealden, Mid Sussex, Tandridge and Sevenoaks could result in increased traffic levels and recreational visits	To Be Determined

Screening for Mole Gap to Reigate Escarpment SAC for the Crawley Local Plan Review (2020 – 2035)						
Site	Qualifying Features	Key Environmental Conditions to Support Site Integrity	Possible Impacts Arising from the Local Plan Review	Is there a Risk of a Significant Effect?	Possible Impacts from Other Trends, Plans etc.	Is there a Significant Risk of 'In Combination' Effects?
Mole Gap to Reigate Escarpment SAC	<ul style="list-style-type: none"> Natural Box Scrub Dry Grasslands and Scrublands on Chalk or Limestone, including important Orchard Sites Yew-dominated Woodland Dry Heaths Beech Forests on Neutral to Rich Soils Great Crested Newts Bechstein's Bat 	<ul style="list-style-type: none"> Appropriate Management: Grazing Absence of Direct Fertilisation Minimal Air Pollution Low Recreational Pressure Absence of Urbanisation Effects (e.g. introduction of invasive non-native species) Suitable Foraging and Refuge Habitat within 500m of Ponds Relatively Unpolluted Water of roughly Neutral pH Some ponds deep enough to retain water throughout February to August at least one year in every three Great Crested Newts require Good Connectivity of Landscape Features (pond, hedges etc.) as they often live as metapopulation Bats require Good Connectivity of Landscape Features to allow Foraging and Commuting 	Potential air pollution emissions from development and additional traffic related to new sites	No – the site is 10km away from the administrative boundary of Crawley	Developments in Waverley, Mole Valley, Guildford, Tandridge and Reigate and Banstead could result in increased traffic levels, recreational visits and water abstraction	To Be Determined
			New development in Crawley could potentially increase traffic and recreational pressure on the Escarpment	No – evidence suggests that very few existing Crawley residents access the site on a regular basis		To Be Determined
			New development in Crawley could potentially result in changes to water levels along the Mole Valley	No – the Environment Agency's abstraction consent process should avoid impacts to water levels		No – see previous answer
			Additional new housing in Crawley could potentially result in changes to water quality along the Mole Valley	No – The Environment Agency's discharge consent process should not permit a Significant Effect		No – see previous answer

Screening for Ashdown Forest SPA for the Crawley Local Plan Review (2020 – 2035)						
Site	Qualifying Features	Key Environmental Conditions to Support Site Integrity	Possible Impacts Arising from the Local Plan Review	Is there a Risk of a Significant Effect?	Possible Impacts from Other Trends, Plans etc.	Is there a Significant Risk of 'In Combination' Effects?
Ashdown Forest SPA	<ul style="list-style-type: none"> Nationally Important Breeding Populations of Nightjar and Dartford Warbler (SPA) 	<ul style="list-style-type: none"> Minimal Air Pollution (nitrogen deposition can cause compositional changes over time) Use of grazing management to prevent succession Balanced hydrological regime to maintain wet heath Low recreational disturbance Absence of urbanisation Suitable foraging and refuge habitat within 500m of ponds Relatively unpolluted water of roughly neutral pH 	Potential air pollution emissions from development and additional traffic	No – the site is 10km away from the administrative boundary of Crawley	Developments in Wealden, Mid Sussex, Tandridge and Sevenoaks could result in increased air pollution	To Be Determined
			New development in Crawley could potentially increase traffic and recreational pressure in the Forest	No – evidence suggests that very few existing Crawley residents access the site on a regular basis	Developments in Wealden, Mid Sussex, Tandridge and Sevenoaks could result in increased traffic levels and recreational visits	To Be Determined

Screening for South West London Waterbodies SPA for the Crawley Local Plan Review (2020 – 2035)						
Site	Qualifying Features	Key Environmental Conditions to Support Site Integrity	Possible Impacts Arising from the Local Plan Review	Is there a Risk of a Significant Effect?	Possible Impacts from Other Trends, Plans etc.	Is there a Significant Risk of 'In Combination' Effects?
South West London Waterbodies SPA	<ul style="list-style-type: none"> Internationally Important Wintering Populations of: <i>Anas clypeata</i> (Northern Shovler) and <i>Anas strepera</i> (Gadwell) 	<ul style="list-style-type: none"> Lack of Disturbance during Winter Months; Areas of Open Waters; Areas of Shallow Water (<300mm) for feeding; Presence and Abundance of Aquatic Plant Food; Presence and Abundance of Aquatic Invertebrate Food; Relevant Nearby Waterbodies used for Feeding and as Refuges 	Water Quality – Eutrophication is a threat, particularly from point source pollution (e.g. sewage outfalls) but also from surface run-off or groundwater pollution and atmospheric deposition.	No – the Environment Agency's discharge consent process should not permit development that leads to degraded river conditions	Developments in Waverley, Mole Valley, Guildford, Tandridge and Reigate and Banstead could increase water abstraction and result in a reduction in water quality	No – see answer relating to Significant Effects
			Water Levels – a high and stable water table is essential	No – the Environment Agency's abstraction consent process should avoid impacts to water levels		No – see answer relating to Significant Effects

APPENDIX D: PLANNED DEVELOPMENT CLOSE TO CRAWLEY

Local Authority	House construction proposed	Document source and status
Adur	177dpa	Adopted Adur Local Plan (2017)
Arun	20,000 between 2011 and 2031 1,000dpa	Adopted Local Plan (July 2018)
Brighton and Hove	660dpa	Adopted Brighton and Hove City Plan Part 1 (2016)
Chichester	435dpa	Adopted Chichester Local Plan (2015)
Elmbridge	3,327 between 2011-2026 225dpa	Adopted Core Strategy (July 2011)
Guildford	10,678 between 2015-2034 562dpa	Adopted Local Plan (April 2019)
Horsham	16,000 between 2011-2031 800dpa	Adopted Horsham District Planning Framework (2015)
Lewes	345dpa	Adopted Lewes and South Downs National Park Joint Core Strategy (2016)
Mid Sussex	16,390 between 2014-2031 876dpa from 2014/15-2023/24; 1,090 from 2024/25 -2030/31	Adopted District Plan (March 2018)
Mole Valley	3,760 up to 2026 441dpa	Core Strategy (September 2009) Proposed National Standardised Methodology
Reigate and Banstead	6,900 between 2012-2027 460dpa	Adopted Core Strategy (2014)
Sevenoaks	3,300 in line with the former South East Plan	Adopted Core Strategy (February 2011)
South Downs National Park	4,750 between 2014-2033 250dpa	Adopted Local Plan (July 2019)
Tandridge	2,500 in line with former South East Plan 644dpa 6,056 between 2019-2033 433dpa	Adopted Core Strategy (October 2008) Proposed National Standardised Methodology Local Plan 2033 Submission (January 2019)
Waverley	11,210 between 2013 and 2032 590dpa	Adopted Local Plan Part 1 (February 2018)

Local Authority	House construction proposed	Document source and status
Wealden	9,440 between 2006-2027 450dpa 14,228 between 2013-2028 950dpa	Wealden and South Downs National Park Authority Adopted Core Strategy (February 2013) Wealden Submission Local Plan (January 2019)
Worthing	200dpa 636dpa	Adopted Core Strategy (2011) Proposed National Standardised Methodology