

**HABITAT REGULATIONS ASSESSMENT
OF THE CRAWLEY BOROUGH COUNCIL
LOCAL PLAN**

**SCREENING REPORT FOR CONSULTATION WITH THE
SUBMISSION LOCAL PLAN**

NOVEMBER 2013

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1.0 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 Crawley Borough Council's latest strategic planning document. Previously called the Core Strategy Review, the Council is preparing a new Local Plan for long term development of the borough. The council has therefore produced this Habitat Regulations Assessment Screening 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 will be used to identify any necessary changes (in the form of modifications to policy, alternatives or mitigation) to the Plan.
- 1.4 This Screening Report concludes 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 their distance from the borough's boundaries. Evidence from the council's transport modelling (stage 1) report has been added from the previous draft Screening Report relating to the forecasted traffic impacts on Ashdown Forest SPA / SAC. This exercise also 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.

2.0 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 Habitat Regulations Assessment (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. Previous rulings show that these cases are rare but compensation will be necessary to ensure the overall integrity of the site network.

3.0 Methodology

3.1 The Department for Communities and Local Government (DCLG) published draft guidance on the Habitat Regulations Assessment process in August 2006: 'Planning for the Protection of European Sites: Appropriate Assessment'. The guidance recommends a three-stage process, as set out below.

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 & 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 establish the 'imperative reasons of overriding public interest' (OROPI). This is not considered a standard part of the process and will only be carried out in exceptional circumstances.

3.2 All three stages of the process are referred cumulatively as the Habitat Regulations Assessment, to clearly distinguish the whole process from the step within, it is referred to as the Appropriate Assessment. This document covers Stage One – Screening.

4.0 Introduction to screening

4.1 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 (stage one, as set out in paragraph 3.1). 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 effect 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.

5.0 The relevant European Sites

5.1 There are no European Sites within Crawley itself; however, the table below lists those sites within 15 km of the borough's boundary. The 15 km buffer zone has become best practice for carrying out Habitat Regulations Assessments. A map showing the location of these sites in relation to Crawley Borough is included as Appendix A.

Table 5.1: European Sites within 15km of Crawley

Name of Site	Approx. distance from Crawley Borough	Reasons for Designation
Ashdown Forest SAC	Straight line: 10 km By road: 12 km	<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: 10 km By road: 11 km	<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 forests on neutral to rich soils ▪ Great Crested Newt ▪ Bechstein's Bat
Ashdown Forest SPA	Straight line: 10 km By road: 12 km	Populations of European importance of: <ul style="list-style-type: none"> ▪ Nightjar ▪ Dartford Warbler

5.2 Data has been collected and analysed for each of these European sites. The primary source was the Natura 2000 Standard Data Forms available on the JNCC web site (www.jncc.gov.uk). For example, these were used to inform the screening tables in Section 7 below.

5.3 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. Other sites were considered in order to inform this Habitat Regulations Assessment Screening Report, however, only one was identified as potentially being affected; the South West London Waterbodies SPA.

Table 5.2: European Sites downstream of but beyond 15km of Crawley

Name of Site	Approx. distance from Crawley Borough	Reasons for Designation
South West London Waterbodies SPA	Straight line: 30km By road: 32.7km	Internationally important wintering population of: <ul style="list-style-type: none"> ▪ <i>Anas clypeata</i> (Northern Shovler) and ▪ <i>Anas strepera</i> (Gadwell)

5.4 Two of the reservoirs that make up the South West London Waterbodies SPA are situated within the River Mole catchment area, downstream of Crawley Borough. A Joint Authority Outline Water Cycle Study was carried out in 2011 (updated for Crawley only in 2013) covering Crawley and catchments in neighbouring authorities. The River Mole, receiving wastewater from Crawley Wastewater Treatment Works is currently at Moderate Potential Status upstream of the works, and downstream is currently Poor Status, predicted to remain poor by 2015. Following some initial

research (see Appendix B further details) it was considered that it was unlikely that the Local Plan would impact upon the conservation objectives of this European site, either on its own or in combination with other plans. This conclusion reflects the distance of the site from Crawley and also that the Environment Agency's abstraction and discharge consent processes should avoid impacts to water levels and quality.

- 5.5 Consequently, the council considers that none of the sites beyond the 15km boundary will be significantly affected by the Local Plan. The remainder of this Habitat Regulations Assessment Screening Report will therefore concentrate on the three sites located within the 15km buffer.

6.0 The Local Plan

- 6.1 The review of the Core Strategy will result in a Local Plan for Crawley that will set out the council's vision for the spatial development of the borough over the period to 2030, taking into account a wide range of policy areas and development issues. These include general policies relating to the built and natural environment, sustainable resources, biodiversity, employment, infrastructure and transport, and more specific policies such as the number of new homes that will need to be provided in the borough over the plan period, as well as land allocations.
- 6.2 The aim of the Local Plan is to ensure that Crawley will remain a desirable place in which to live, work and visit, offering a high quality of life to all. The Plan will be a strategic document that aims to bring together the plans of other bodies which have an impact on the development of the borough as well, for example, utility companies, Gatwick Airport Limited and West Sussex County Council.

Geographic Coverage

- 6.3 Crawley Borough covers 4,497 hectares and is situated in the northeastern part of the County of West Sussex. Horsham District adjoins the town on the western side; Mid Sussex District to the south and east and the County of Surrey to the north.
- 6.4 Mainly urban in character, Crawley is surrounded by countryside and a small part of the southern area is within the High Weald Area of Outstanding Natural Beauty (AONB). It lies adjacent to the M23 and close to the M25 and is on the main railway line linking London to the south coast. Gatwick Airport, one of the world's major international airports, is located within the northern part of the borough.
- 6.5 There is a comparatively young population in Crawley, which leads to local population and household growth and increased demands for housing, employment and services. However, the elderly population is growing fast which places additional demands on a range of services. The number of people aged over 65 increased by nearly 30% between 1991 and 2001 and has only reduced by 9% at the time of the 2011 Census.
- 6.6 The Local Plan will incorporate the spatial plan for Crawley Borough and therefore, include policies that cover the entire borough. It will also update the 'saved' policies of the Local Plan 2000, that relate to Development Management.

Timescale over which the plan will be implemented

- 6.7 The Local Plan will cover the period 2015 to 2030, although it will inevitably have implications beyond that.

Likely key outcomes and impacts of the plan

6.8 It is expected that the Local Plan will have to provide for:

- At least 3,800 new homes delivered through several significant developments, some of which are already allocated in the adopted Core Strategy (2008) (e.g. the North East Sector). The developments will include an appropriate housing mix with a 30% proportion of affordable housing, as well as provision of jobs, shops, cultural and recreational facilities, education, health and community facilities and other necessary infrastructure, particularly transport. The developments will be located and designed to enable accessibility by all members of the community, and must facilitate the use of sustainable resources and minimise their carbon footprint. Environmental constraints and opportunities will be taken into account, and the Plan includes improvements and extensions to areas designated for their nature conservation interest;
- Additional employment land, particularly within the Manor Royal Business Estate.
- The Town Centre North redevelopment.

6.9 As such, the potential impacts of the Local Plan are to be in the form of:

- 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.

In combination effects

6.10 Between the Local Plan period between 2015 and 2030, there are also likely to be a number of developments (notably additional housing) in local authorities adjoining and close to Crawley that could negatively impact upon the three European Sites ‘in combination’ with Crawley’s Local Plan.

6.11 A number of Local Authorities are reviewing their local housing targets and development proposals in light of the Localism Bill, the adoption of the National Planning Policy Framework (NPPF, 2012) and revocation of the South East Plan in 2013. The Local Plan will take account of changes to development proposals in neighbouring authorities as they come forward during its preparation, and will continue to work across administrative boundaries to assess the cumulative impact of development in the sub-region. Table 6.1 summarises proposed and adopted housing targets in the recent plans of neighbouring authorities.

Table 6.1: Planned Development adjacent to Crawley

Local Authority	House construction proposed	Document source and status
Guildford	Interim target of 322 p.a. between 2011-2031, which is currently being reviewed.	Local Plan Strategy and Sites: Issues and Options paper (October 2013)
Horsham	11,500 between 2011-2031 or 575 p.a.	Horsham District Planning Framework Draft Preferred Strategy (October 2013)
Elmbridge	3,327 between 2011-2026 or 225 p.a.	Adopted Core Strategy (July 2011)

Mid Sussex	10,600 between 2011-2031 or 530 p.a.	Submission District Plan (May 2013)
Mole Valley	3,760 up to 2026	Core Strategy (September 2009)
Reigate and Banstead	6,900 between 2012-2027 or 460 p.a.	Consultation on Core Strategy Outstanding Issues (September 2011)
Sevenoaks	3,300 in line with the former South East Plan	Adopted Core Strategy (February 2011)
Tandridge	2,500 in line with former South East Plan.	Adopted Core Strategy (October 2008)
Waverley	3,614 between 2012-2028 or 226 p.a.	Core Strategy: Pre-Submission document (August 2012) but later withdrawn
Wealden	9,440 between 2006-2027 or 450p.a.	Wealden and South Downs National Park Authority Adopted Core Strategy (February 2013)

7.0 Screening Tables

7.1 Taking into account the information set out in this section and the research into the relevant European Sites, Tables 7.1-7.3 on the following pages provide a screening process for the three European Sites potentially affected by Crawley's Local Plan.

Table 7.1: Screening for Ashdown Forest SAC for the Crawley Local Plan

Site	Qualifying Features	Key environmental conditions to support site integrity	Possible impacts arising from the Core Strategy 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 	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.	Difficult to asses. See Section 8 below.
		<ul style="list-style-type: none"> ▪ 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. 	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.	<p>Developments in Wealden, Mid Sussex, Tandridge and Sevenoaks could all increase traffic levels and recreational visits. In particular, an East Grinstead Relief Road could result in A22 becoming a more attractive route for traffic</p>	Plans for Mid Sussex and Wealden have been shown to have an impact and are therefore taking necessary steps to ensure that there is no conflict. Whilst new development in Crawley would result in some increase in visitors to Ashdown Forest, these numbers are predicted to be relatively small.

Table 7.2: Screening for Mole Valley to Reigate Escarpment SAC for the Crawley Local Plan

Site	Qualifying Features	Key environmental conditions to support site integrity	Possible impacts arising from the Core Strategy 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 orchid sites. • Yew-dominated woodland • Dry heaths • Beech forests on neutral to rich soils • Great crested newt, • Bechstein's bat 	<ul style="list-style-type: none"> • Appropriate management: grazing. • Absence of direct fertilization. • 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 (ponds, hedges etc) as they often live as a metapopulation. • Bats require good connectivity of landscape features to allow foraging and commuting. 	Potential air pollution emissions from development and additional traffic related to the new sites.	No – Site is 10km away from the administrative boundary of Crawley	Developments in Waverley, Mole Valley, Guildford, Tandridge and Reigate and Banstead could all increase traffic levels, recreational visits and water abstraction.	Difficult to asses. See Section 8 below.
			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.		Whilst new development in Crawley would result in some increase in visitors to the Mole Gap to Reigate Escarpment these numbers are likely to be relatively small.
			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.
			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		No – See previous answer.

Table 7.3: Screening for Ashdown Forest SPA for the Crawley Local Plan

Site	Qualifying Features	Key environmental conditions to support site integrity	Possible impacts arising from the Core Strategy 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) 	Potential air pollution emissions from new 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.	Difficult to asses. See Section 8 below.
		<ul style="list-style-type: none"> ▪ Use of grazing management to prevent succession ▪ Balanced hydrological regime to maintain wet heath. ▪ Low recreational disturbance ▪ Absence of urbanisation ▪ Relatively unpolluted water of roughly neutral pH. 	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.	<p>Developments in Wealden, Mid Sussex, Tandridge and Sevenoaks could all increase traffic levels and recreational visits. In particular, the East Grinstead Relief Road may result in A22 becoming a more attractive route for traffic</p>	<p>No – Plans for Mid Sussex and Wealden have been shown to have an impact and there are therefore taking necessary steps to ensure that there is no conflict. Whilst new development in Crawley would result in some increase in visitors to Ashdown Forest these numbers are predicted to be relatively small.</p>

8.0 Detailed Consideration of the Possible Impacts

Air pollution

- 8.1 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.
- 8.2 This is not to say that general air pollution should not be addressed, but rather that it is a region-wide or even national problem that should really be addressed at that level. Indeed, the issue was considered as part of the Habitat Regulations Assessment (HRA) of the former South East Plan.
- 8.3 It is therefore 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.

Recreational pressure

- 8.4 **Ashdown Forest** is roughly 10km from Crawley's boundary as the crow flies and 12km by road. A tourist survey of Ashdown Forest carried out by Tourism South East in summer 2004 found that, of 218 visitors surveyed, 72% were day visitors from outside the Forest area but that the number of these visitors that actually came from Crawley was very small. This suggested that new development proposed by the local plan is unlikely to have a significant impact on the Ashdown Forest. However, when the Council published this conclusion in an Initial Scoping Report in May 2009, several respondents indicated that more up-to-date information was required to inform this statement.
- 8.5 In 2007, the HRA Screening Report prepared by UE Associates on behalf of Mid Sussex District Council (MSDC) to accompany their Draft Consultation District Plan revealed potential significant and/or uncertain effects on the Ashdown Forest SAC and SPA. To help identify whether the plan would have adverse effects on site integrity, MSDC commissioned UE Associates (jointly with Wealden District Council (WDC)) to produce a Visitor Access Patterns on Ashdown Forest Report. This was completed in September 2009 and provides information resulting from a survey of visitors to Ashdown Forest carried out during summer/autumn 2008. The aim of the study was to help determine the potential impacts of the respective authorities Development Plans (in combination with other plans) by establishing current and future patterns of recreation, with particular regard to the protected bird species of the Dartford Warbler and the Nightjar.
- 8.6 The study examined the range of access points into the Forest to determine the types of visitors to the Forest; how frequently and why they visit; the routes they take while they are there; and the distance they travelled to reach the Forest. Further issues which may have an impact on the management of the Forest were raised through a survey of visitors leaving the Forest.

- 8.7 The findings confirm that Ashdown Forest is a well-used resource with annual visits to the Forest estimated at around 1.35 million, with the majority of people (60.0%) visiting for the primary purpose of dog-walking. Nearly 85% of the people visiting the forest by car, travelled 10km or less, indicating significant usage by the local population. Moreover, the research found that only 4.3% of visitors came from Crawley Borough (that is, c.58,000 p.a.).
- 8.8 In 2010 a further study requested by Natural England analysed visitor survey data to determine whether bird density was influenced by visitor numbers. The study found that, on the evidence available, there was no evidence that the density of Annex I birds was lower in areas with higher visitor pressure within the site
- 8.9 A final HRA, including Appropriate Assessment, was published in May 2013 with Mid-Sussex's Submission District Plan. A 7km zone of influence around Ashdown Forest is recommended as a policy of the District Plan and is now contained within the Submission District Plan for Mid-Sussex (subject to a public examination). This is the area within which the majority (83%) of regular visitors to the Forest originated, and therefore where measures targeted at reducing pressure on the Forest would be most effective. Natural England has stated that 8ha of Suitable Alternative Natural Green Space (SANGS) should be provided for every 1,000 net increase in population (or part thereof) within this zone
- 8.10 At its closest point, Crawley Borough is 10km away from the Ashdown Forest SAC and SPA. Therefore, whilst the Local Plan will inevitably have some impact on the Ashdown Forest through increased recreational visits and associated traffic, it is considered that this impact will not be significant. This has been confirmed through Crawley's Transport Strategy Report: Stage One (2012) completed by Amey, which demonstrated that all the development options considered by the Local Plan would not cause significant traffic flow impacts, or reductions in air quality, on routes through the Ashdown Forest (namely, the A275, A22, A26 and B2110).
- 8.11 The **Mole Gap to Reigate Escarpment SAC** is also approximately 10km from the borough's boundaries in a straight line. Surveys undertaken by the National Trust and Bournemouth University in recent years, have indicated that Crawley is not a significant source of visitors. The majority of those surveyed had travelled significant distances, but primarily from the north. These studies are quoted in Reigate and Banstead Council's 2012 HRA Appropriate Assessment of the Core Strategy.
- 8.12 The low numbers of Crawley residents visiting these sites reflects the fact there are many alternative locations for recreational activity both within and adjacent to the borough. Perhaps the most notable local resource for Crawley's residents is Tilgate Park, a highly regarded semi natural park, immediately adjoining the town and covering approximately 90 hectares. Previously, a NPPF compliant Open Space, Sport and Recreation Study carried out for the Council in 2013 concluded that the borough is well provided for in terms of accessible natural and semi-natural green space with a total of 301.21 ha (this figure does not include parks and gardens, green corridors, amenity green space, allotments and outdoor sports pitches). The figure for natural and semi-natural green space is equivalent to a local provision of 2.83 ha per 1000 population. This compares favorably to Natural England's recommended standard of 2.0 ha per 1000. Although there are some localised deficiencies, the borough is generally well provided for in terms of natural and semi-natural spaces, with all residents being within an accessible catchment of a natural and semi-natural site.
- 8.13 A household survey which formed part of the study sought to ascertain what respondents considered to be an acceptable travel distance to reach natural and

semi-natural spaces and what their preferred mode of transport would be. The majority indicated that they were willing to travel up to 10 minutes to access a natural or semi-natural green space, with around 45% of people walking and only 30% traveling by car. This indicates that residents within Crawley do want natural areas close to their homes, though a minority of residents are willing to travel slightly further afield if necessary.

- 8.14 It is clear that Crawley lies outside the general catchment area for Ashdown Forest, and the Mole Gap to Reigate Escarpment SAC. Having regard to the general level of open space provision within Crawley, it can reasonably be concluded that any additional demand for recreational open space generated by the overall increase in households in the borough over the Plan period will not extend significantly beyond the borough's boundaries. Clearly existing residents visit popular sites in the region at various times during the year and are included in the overall visitor numbers at those sites. There is, however, no evidence to suggest that any aspect of the Local Plan (particularly housing provision) will increase the incidence of leisure visits to such areas outside the borough to a significant degree. As previously stated, this conclusion was also reflected in the transport modelling report undertaken by the council for the Local Plan. It is therefore considered that the recreational pressure on the Ashdown Forest SPA and SAC and the Mole Gap to Reigate Escarpment SAC can be screened out.

Water levels

- 8.15 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 and commercial buildings must, where viable and feasible, exceed the current minimum water efficiency standards from the Code for Sustainable Homes or BREEAM.

Water quality

- 8.16 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

- 8.17 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. All development options considered for the Local Plan were assessed through the Crawley's Local Plan Transport Strategy Stage One (2012) and it was concluded that impact upon air quality in the Ashdown Forest (assessed in terms of change in annual daily traffic flow of more than 1,000 vehicles, 2 way, relative to the baseline situation in 2029) would not be significant.

9.0 Conclusions of the Habitat Regulations Assessment Screening Report

- 9.1 The council considers that the possible effects of the Local Plan will not have a significant adverse impact (either on their own or 'in combination' with other plans) on the European Sites considered as part of this Screening Report.

Ashdown Forest SAC

- 9.2 It was considered that increased air pollution would be the main adverse impact of the Local Plan on this particular site. However, it has been indicated that the increases in traffic flows (particularly on the A22, A275, A26 and B2110) resulting from development proposed within the Local Plan would not adversely affect air quality in the Ashdown Forest.

Mole Gap to Reigate Escarpment SAC

- 9.3 The Screening Report reveals there to be no risk of significant effects on the Mole Gap to Reigate Escarpment SAC, either directly or in combination with other plans. In terms of air pollution, this is more easily dealt with at other scales. With regards to water levels and quality, it is expected that Environment Agency's consent process will ensure that the Local Plan will not significantly impact upon the site's conservation objectives. In addition, Crawley is not a significant source of visitors to the Mole Gap to Reigate Escarpment, primarily because there are so many other locations to undertake recreational activities in and around the borough.

Ashdown Forest SPA

- 9.4 Recreation pressure was identified as being the greatest potential adverse impact of the Local Plan on this site. The HRA (2013) and supporting documents developed on behalf of Mid-Sussex District Council and Wealden District Council demonstrates that the Local Plan is unlikely to have a significant impact on that site's conservation objectives. The council's Open Space, Sport and Recreation Assessment indicates not only that there are sufficient accessible natural and semi-natural green spaces within the town for the local population but also that Crawley's residents prefer to access such spaces by foot. There is therefore, no evidence to suggest that the Local Plan will increase the incidence of leisure visits to the Ashdown Forest to a significant degree.

10.0 Consultation Arrangements

- 10.1 This Screening Report has been published alongside the Crawley Borough Council Submission of its Local Plan and its accompanying Sustainability Appraisal Report, for a statutory six week public consultation period, which starts on 13th January 2014 and concludes on the 24th February 2014. All comments received on the Screening Report are welcomed. Should you wish to comment on this document, please do so on or before **5pm on 24th February 2014**.
- 10.2 There are three ways in which representations can be submitted:
- Electronically using the dedicated webpage: www.crawley.gov.uk/crawley2029
 - Electronically by email to forward.plans@crawley.gov.uk
 - By post to Forward Planning, Crawley Borough Council, Town Hall, The Boulevard, Crawley, West Sussex, RH10 1UZ.
- 10.3 For further information about the Habitat Regulations Assessment, please contact James Webster on (01293) 438450 or e-mail forward.plans@crawley.gov.uk

10.4 The Habitat Regulation Assessment Screening Report can be viewed on the council's website at www.crawley.gov.uk/crawley2029

10.5 Hard copies of the documents are also available to view at:

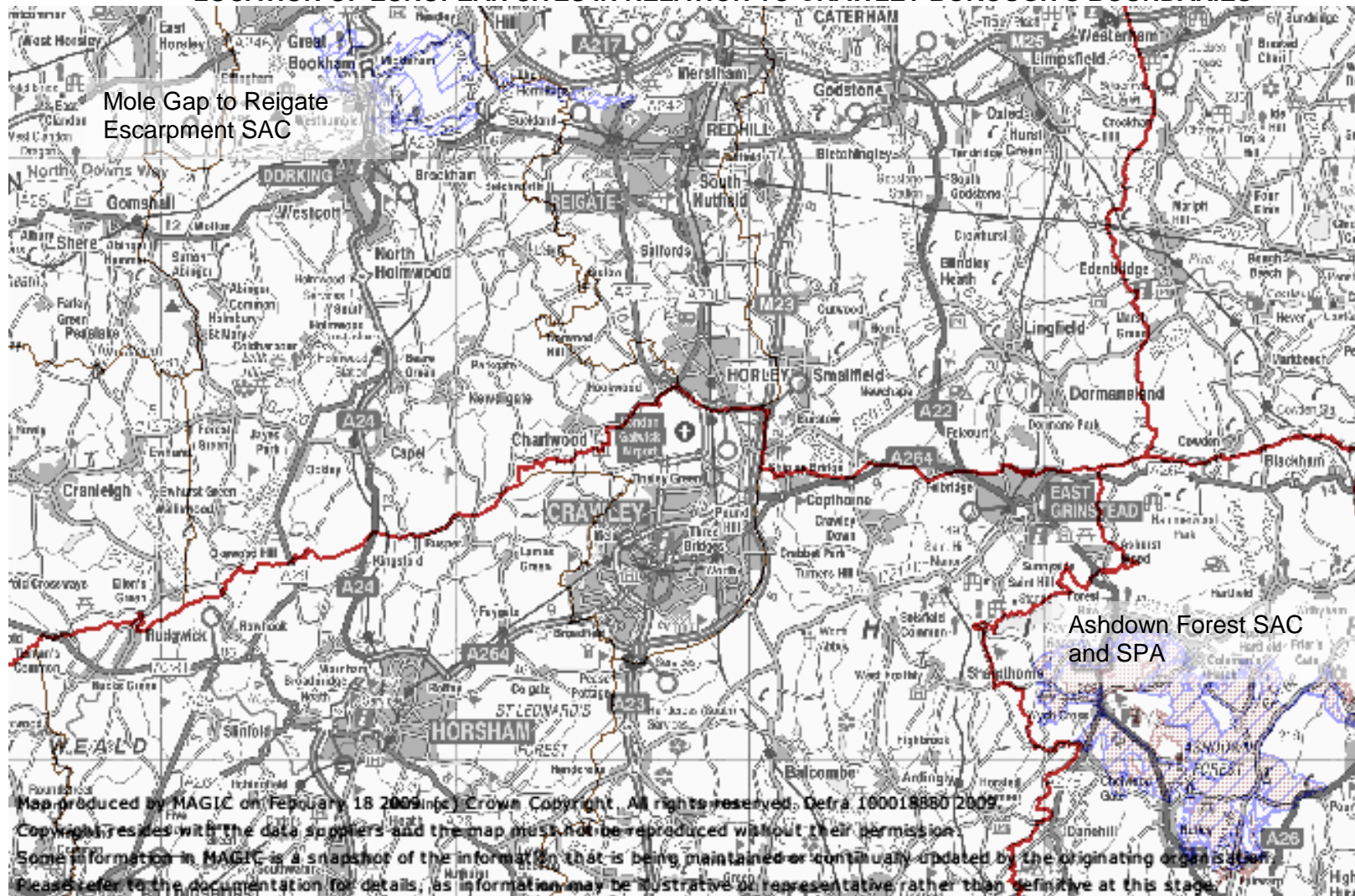
Town Hall: The Boulevard, Crawley, West Sussex, RH10 1UZ. Phone 01293 438000
Opening hours: Monday to Friday 8.30 am - 5.00 pm.

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

Broadfield Library: 46 Broadfield Barton, Broadfield, Crawley, RH11 9BA
Phone 01293 543298 Opening hours: Monday – Friday 10.00am -5.00pm Saturday
10.00am -2.00pm

APPENDIX A: Location of European sites in relation to Crawley Borough's Boundaries

LOCATION OF EUROPEAN SITES IN RELATION TO CRAWLEY BOROUGH'S BOUNDARIES



- Counties, Metropolitan Districts and Unitary Authorities (GB)
- LAU1 - Districts and Unitary Authorities (England)
- Special Protection Areas (England)
- Special Areas of Conservation (England)

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APPENDIX B: Other sites considered

Other Sites Considered

- B1 The council has identified and assessed the impact of the Local Plan on all European Sites within 15km of the borough's boundaries. This distance is generally taken as the outer buffer in most HRA Screening Reports. However, the council is aware that it is possible that the Local Plan might impact upon European Sites beyond 15km. In particular, there is a need to consider whether the Plan will negatively impact upon European Sites via the water system 'downstream' of Crawley especially as the HRA that accompanied the former South East Plan identified that there might be problems relating to both water supply and quality in the Gatwick Diamond sub-region.
- B2 The map at Figure B.1 illustrates the European Sites (as well as Sites of Special Scientific Interest (SSSI)) within the River Mole catchment area. This suggests that the only other European Site that needs to be considered is the South West London Waterbodies SPA.
- B3 The South West London Waterbodies SPA comprises a series of embanked water supply reservoirs and former gravel pits that support a range of man-made and semi-natural open water habitats. The reservoirs and gravel pits function as important feeding and roosting sites for wintering wildfowl, in particular Gadwall *Anas strepera* and Shoveler *Anas clypeata*, both of which occur in numbers of European importance. It should be noted that only two of these water bodies are located directly within the River Mole Catchment Area, the adjoining Bessborough and Knight Reservoirs.
- B4 As with the Mole Gap to Reigate Escarpment SAC, the Environment Agency's abstraction consent process should avoid impacts to water levels, whilst their discharge consent process should not permit development that leads to degraded river conditions.

APPENDIX B: Other sites considered

Figure B.1: European sites and SSSI in the River Mole catchment area

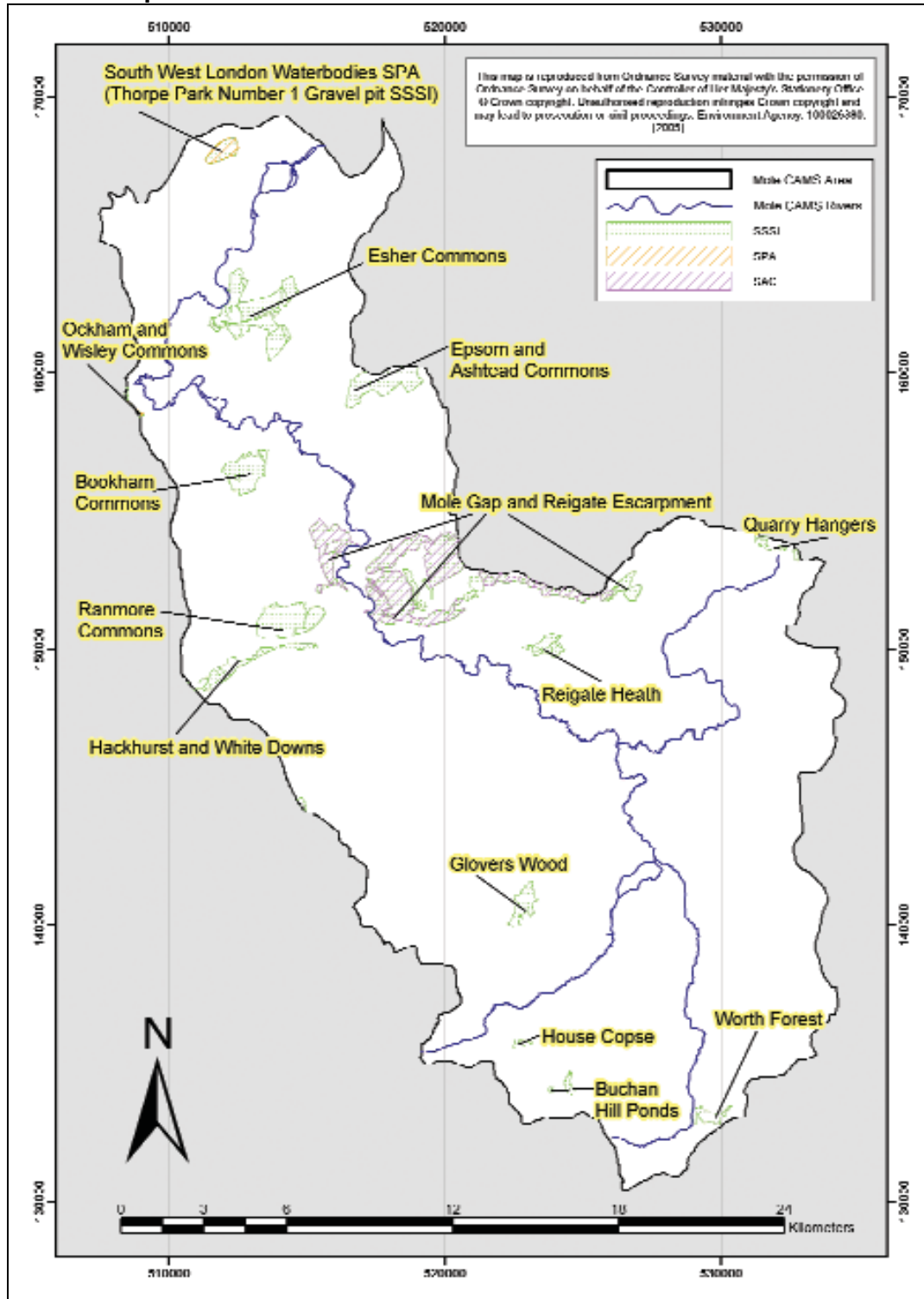


Table B.1: Screening for South West London Waterbodies SPA for the Crawley local plan

Site	Qualifying Features	Key environmental conditions to support site integrity	Possible impacts arising from the Core Strategy 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	Internationally important wintering populating 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 abstraction consent process should avoid impacts to water levels.	Developments in Waverley, Mole Valley, Guildford, Tandridge and Reigate and Banstead could all 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	No – The Environment Agency's discharge consent process should not permit development that leads to degraded river conditions.		No – See answer relating to significant effects.