Puttenham Neighbourhood Plan 2019 – 2033

Strategic Environmental Assessment Screening and Habitat Regulations Assessment Report

April 2019
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1. Introduction

1.1 Background

The Localism Act (2011) introduced new powers to enable local communities to guide and shape development through the production of Neighbourhood Plans, with further accompanying detail on how to do this set out in The Neighbourhood Planning (General) Regulations 2012 (as amended).

The purpose of the Puttenham Neighbourhood Plan is to provide locally derived and agreed planning policy which will be used when making planning decisions within the designated Puttenham Neighbourhood Area.

Strategic Environmental Assessment (SEA) is required under European Directive 2001/42/EC (the SEA Directive) for all plans which may have a significant effect on the environment. For neighbourhood plans, this particularly relates to plans which designate sites for development. The purpose of the SEA is to provide a high level of protection of the environment and to integrate considerations of the environment into the preparation and adoption of plans with a view to promoting sustainable development.

To ascertain if SEA is required, a screening exercise is undertaken which looks at the draft policies and proposals in a neighbourhood plan to determine whether a significant effect is likely. The criteria for this screening are set out in the relevant legislation\(^1\). It also determines whether or not the contents of the Puttenham Neighbourhood Plan require a Habitats Regulations Assessment (HRA) in accordance with European Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora, i.e. the ‘Habitats Directive’ and the associated Conservation of Habitats and Species Regulations 2017 (otherwise known as the ‘Habitats Regulations’).

The legislative background, set out in Section 2, outlines the regulations that stipulate the need for this screening exercise. Sections 3 and 4 provide screening assessment of the Puttenham Neighbourhood Plan which will be used to determine if there are likely to be any significant environmental effects and a requirement for a full SEA and HRA (Appropriate Assessment).

1.2 The aims of this report

The primary aims of this Screening Report are to:

1. Identify whether the Puttenham Neighbourhood Plan requires a Strategic Environmental Assessment (SEA) by appraising the potential high-level environmental impacts that may arise from the Neighbourhood Plan and concluding whether there is a need to conduct a full SEA.

2. Identify, describe and assess the likely significant effects of implementing the Plan on European designated sites (i.e. Special Areas of Conservation (SACs) and Special

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\(^1\) European Directive 2001/42/EC (the SEA Directive) and Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations).
3. Protection Areas (SPAs) and also Ramsar sites) within and around the neighbourhood area of Puttenham as part of a Habitats Regulations Assessment (HRA).

These two aims are closely interlinked, with the HRA providing supporting evidence for the conclusions reached within the SEA.

This report details whether there is a need for the Puttenham Neighbourhood Plan to be accompanied by an SEA or HRA. It will be sent to the three statutory consultees (Environment Agency, Historic England and Natural England) to seek their views on its contents.

This report will be updated as the neighbourhood plan evolves and will be finalised once the plan reaches the final draft stage (submission draft). The aforementioned consultation phase will be undertaken on the final version of the report.

1.3 The Puttenham Neighbourhood Plan

The Vision and objectives of the Puttenham Neighbourhood Plan are outlined below:

**Vision:**
“Our vision is to maintain Puttenham Parish as a thriving vibrant community of rural character and identity, preserving its heritage assets, listed buildings and conservation area so that it will remain a visually attractive, independent settlement, set in unspoilt, tranquil and accessible countryside, providing an excellent quality of life for residents, visitors and those who work in the Parish”.

**Objectives of the Plan**

**Social**
1. To ensure that new housing development in the Parish is affordable and meets the needs of the local community
2. To improve the health and vitality of the parish and ensure that the needs of residents and visitors are met through retaining, supporting and improving the parish’s valued local community facilities, services and assets.
3. To reduce traffic flows through the village, improve highway and pedestrian safety and parking pressure in the parish and encourage sustainable forms of transport

**Environment**
4. To ensure that future development is appropriate and proportionate to the scale and rural character of the parish.
5. To preserve and enhance the Parish’s unique and valued rural character, independence and landscape setting within the Surrey Hills AONB.
6. To preserve and enhance the parish’s valued natural environment, habitats and biodiversity
7. To ensure new development preserves and enhances the parish’s valued built environment, in particular its listed buildings, conservation area and other non-designated heritage assets.

**Economic**
8. To support the parish’s local, rural and tourism economy
**Plan boundary**

The Puttenham Neighbourhood Plan will influence planning decisions within the designated Puttenham Neighbourhood Area (the neighbourhood area), which has the same boundary as Puttenham Parish. Puttenham is a rural parish set in the Surrey Hills Area of Outstanding Natural Beauty. Puttenham village is the parish’s main settlement which is located approximately 5km to the west of Guildford, to the east of Farnham and to the north of Godalming. The village is set below the southern slopes of the Hog’s Back which is an important feature in the landscape and forms a distinctive backdrop to the village. From Puttenham Common, south of the village, the Wealden landscape stretches into the distance with extensive oak, pine and birch woodland on the lower greensand. The meandering River Wey forms the southern boundary of the parish.

**Heritage**

Puttenham village contains numerous historic buildings, in particular along The Street, many of which are listed. The historic core of the village is designated as a Conservation Area.

There are 33 Listed Buildings in the neighbourhood area including two Grade II* Listed Buildings, these being Puttenham Priory and St Johns the Baptist Church. The majority of listed buildings lie within the historic core of Puttenham village but 13 Grade II Listed Buildings lie outside of the Conservation Area in the rural parts of the neighbourhood area.

There are 10 Areas of High Archaeological Potential in the neighbourhood area, notably the historic core of the village. There are also a number of other AHAPs on the edge of the neighbourhood area.

There are two Scheduled Ancient Monuments in the neighbourhood area (Hillbury Hillfort at Puttenham Common and Frowsbury Mound located just of the B3000).

**Natural Environment**

Puttenham is a rural parish set in the Surrey Hills Area of Outstanding Natural Beauty. The entire neighbourhood area is also designated as an Area of Great Landscape Value (AGLV) for its scenic value and is also entirely within the Green Belt.

However, the neighbourhood area is within a ‘zone of influence’ of the Thames Basin Heath Special Protection Area (SPA), which is an area of heathland identified as an important habitat for various species of birds. The “zone of influence” is between 400m and 5km linear distance from the SPA boundary, and therefore new residential development is restricted and subject to stringent tests and impact assessments. This is on the principle that increased recreational use of the area is likely to result in significant effects on its integrity.

The upper half of the neighbourhood area (including the village of Puttenham) lies within the 400m and 5km zone and the remainder lies within the 5-7km buffer zone.

The neighbourhood area does contain other sites recognised for their biodiversity value including Puttenham and Crooksbury Commons Site of Special Scientific Interest (SSSI) which is an area of heathland supporting a variety of flora and fauna as well as numerous Sites of Nature Conservation Interest (SNCIs) which are of local importance for their nature conservation value.
including William’s Copse and Stoney Hill, Puttenham Common Woods, Lower Puttenham Common and Halsemoor Wood and Broomfield Wood and Gatwick Alder Bed.

There are also two further sites on the edge of the neighbourhood area (Barfield Copse and Inwood Meadow).

The neighbourhood area also has significant amounts of Ancient and Semi-Natural Woodland, primarily to the east and south of Puttenham village in the north of the neighbourhood area.

There are various areas of priority habitats identified in Natural England’s Priority Habitats Inventory. This includes areas of Lowland Heathland and Lowland Fens at Puttenham Common as well as large swathes of Deciduous Woodland across the neighbourhood area. There are also large patches of Woodpasture and Parkland BAP.

2. Legislative background

2.1 Habitat Regulations Assessment

The Conservation of Habitats and Species Regulations 2017 transpose the Directive on Conservation of Natural Habitats and of Wild Fauna and Flora 92/43/EEC (the Habitats Directive) into UK law and require Habitats Regulations Assessment (HRA) to be undertaken for any plan or project likely to have a significant effect upon a European protected site.


It is a requirement of Article 102 of the Conservation of Habitats and Species Regulations 2017 that "the plan-making authority for that plan must, before the plan is given effect, make an Appropriate Assessment of the implications for the site in view of that site’s conservation objectives", where the plan is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and where it is not directly connected with or necessary to the management of the site.

Article 102 also requires that “in the light of the conclusions of the assessment, and subject to regulation 103 (considerations of overriding public interest), the plan-making authority or, in the case of a regional strategy, the Secretary of State must give effect to the land use plan only after having ascertained that it will not adversely affect the integrity of the European site or the European offshore marine site (as the case may be)".

An HRA is required for a plan or project to assess the potential implications for European wildlife sites, i.e. ‘European sites’ or ‘Natura 2000 sites’. It explores whether the implementation of a plan or project would harm the habitats or species for which the European sites are designated. The European sites are:

- Special Protection Areas (SPAs) – designated by the Birds Directive (79/409/EEC as amended and 2009/147/EC), and:
- Special Areas of Conservation (SACs) – designated by the Habitats Directive (92/43/EEC).
In addition to SPAs and SACs, Ramsar sites are designated under the Ramsar convention. The Ramsar convention’s mission is to conserve and sustainably utilise wetland habitats. Although Ramsar sites are not covered by the Habitats Regulations, as a matter of Government Policy, they should be treated in the same way as European wildlife sites (i.e. SPAs and SACs). European wildlife sites and Ramsar sites are collectively known as internationally designated wildlife sites. Sites of Community Importance (SCIs), which are sites that have been adopted by the European Commission but not yet formally designated by the government, must also be considered.

Spatial planning documents, such as Neighbourhood Plans, are required to undergo HRA if they are not directly connected with, or necessary to, the management of a European site. As the Puttenham Neighbourhood Plan is not connected with, or necessary to, the management of European designated sites, it is necessary to undertake a HRA.

**Deciding whether effects are “significant”**

European case law has ruled that the question of whether an effect would be “significant” is linked to the site’s conservation objectives. Under this test:

- A “significant effect” only includes effects which would undermine a European site’s conservation objectives, for example by reducing the area or quality of protected habitat for which the site was designated, or by the disturbance or displacement of species for which the site was designated.
- A plan or project with effects that do not impact on a European site’s conservation objectives would not be considered to be “significant” for the purpose of this decision. For example, this might be the case for low-impact temporary effects, or effects such as the loss of a small area of land which is not an interest feature of the site and has no effect, or an insignificant effect, on the habitat or species which are an interest feature.

The Neighbourhood Planning (General) Regulations 2012 require a submitted neighbourhood plan to include a statement explaining how the proposed Neighbourhood Plan meets the basic conditions set out in paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990. One of the basic conditions requires Neighbourhood Plans to be compatible with EU obligations and to demonstrate that it is not likely to have a significant effect on a European Site. If likely significant effects are identified, the HRA process should proceed to a second stage which is called an ‘Appropriate Assessment’ at which point mitigation effects are considered.

An Appropriate Assessment will consider the implications for the European Site in view of the conservation objectives (generally to restore or maintain the features which led to the designation of the site), and consider whether the plan could affect the integrity of the site. More detailed mitigation measures may be considered at this stage but as stated above a plan should only be agreed once the competent authority has established that the plan will not adversely affect the integrity of the European Sites.

**2.2 Strategic Environmental Assessment**

The Environmental Assessment of Plans and Programmes Regulations 2004 transpose European Directive 2001/42/EC (the SEA Directive) into English Law. This Directive and the Regulations require a Strategic Environmental Assessment (SEA) to be undertaken for certain types of plans or programmes that could have a significant environmental effect.

The objective of the SEA Directive (2001/42/EC) is set out in Article 1 therein, which states:
‘The objective of this Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development, by ensuring that, in accordance with this Directive, an environmental assessment is carried out of certain plans and programmes which are likely to have significant effects on the environment.’

Whether a neighbourhood plan requires a strategic environmental assessment, and (if so) the level of detail needed, will depend on what is proposed in the draft neighbourhood plan. A strategic environmental assessment may be required, for example where:

- a neighbourhood plan allocates sites for development;
- the neighbourhood plan area contains sensitive natural or heritage assets that may be affected by the proposals in the plan; and
- the neighbourhood plan may have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan for the area.

If significant environmental impacts are triggered by the implementation of a Neighbourhood Plan, it is considered prudent to advise that a SEA is required. As such, it is important to determine whether there would be significant environmental impacts as per the SEA Directive.

3. Habitat Regulations Assessment Screening

3.1 HRA Methodology

Habitat Regulations Assessment follows a three-stage process as outlined in the DCLG guidance "Planning for the Protection of European Sites: Appropriate Assessment". These stages are described below:

HRA Task 1 – Screening

This process identifies the likely effects upon a European site of a project or plan, either alone or in-combination with other projects or plans, and determines whether these effects are likely to be significant.

Following the recent ECJ judgement in the case of “people over wind” (Case C-323/17). Measures that are necessary to avoid or reduce impacts on the European site, even when considered standard environmental best-practice, cannot be taken into account at this stage.

If no likely significant effects are determined, the project or plan can proceed. If any likely significant effects are identified, Task 2 commences.

HRA Task 2 – Appropriate Assessment

Task 2 is subsequent to the identification of likely significant effects upon a European site in Task 1. This assessment determines whether a project or plan would have an adverse impact on the integrity of a European site, either alone or in combination with other projects or plans.

This assessment is confined to the effects on the internationally important habitats and species for which the site is designated (i.e. the interest features of the site). If no adverse impact is determined, the project or plan can proceed. If an adverse impact is identified, task 3 is commenced.

HRA Task 3 – Mitigation and Alternatives
Where a plan or project has been found to have adverse impacts on the integrity of a European site, potential avoidance/mitigation measures or alternative options should be identified. If suitable avoidance/mitigation or alternative options are identified, that result in there being no adverse impacts from the project or plan on European sites, the project or plan can proceed. If no suitable avoidance/mitigation or alternative options are identified, as a rule the project or plan should not proceed.

However, in exceptional circumstances, if there is an 'imperative reason of overriding public interest' (IROPI) for the implementation of the project or plan, consideration can be given to proceeding in the absence of alternative solutions. In these cases compensatory measures must be put in place to offset negative impacts.

3.2 HRA Task 1 Screening - methodology

Screening is undertaken to identify the likely impacts of the Puttenham Neighbourhood Plan upon European sites, and to determine whether these impacts are likely to be significant and whether an Appropriate Assessment, and mitigation and assessment of alternatives (HRA Task 2 and 3) are required.

Methodology

In order to complete the screening assessment it is necessary to:

- Identify the European sites within and outside the plan area likely to be affected, the reasons for their designation and their conservation objectives.
- Describe the plan and its aims and objectives and also those of other projects or plans that in combination have the potential to impact upon the European sites.
- Identify the potential effects on the European sites.
- Assess the significance of these potential effects on the European sites.

The Precautionary Principle

If there is uncertainty, and it is not possible, based on the information available, to confidently determine that there will be no significant effects on a site then the precautionary principle will be applied, and the plan will be subject to an Appropriate Assessment (HRA Task 2).

HRA Screening Consultation

It is a requirement of the Habitat Regulations to consult the appropriate nature conservation statutory body. Consultation on the approach to this HRA screening and the information on European sites considered will be undertaken with Natural England as required by sending them this draft Screening report.

Limitations

No limitations were encountered.

3.3 European Sites

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 (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).

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 of 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.

3.3.1 European Sites in and around Puttenham Neighbourhood Area

Best practice guidance suggests that sites occurring within a wider area of approximately 10km to 15km from the boundary of the area directly affected by a plan should be identified and assessed as part of the HRA screening process, in addition to those sites located within the plan area. However, it is important to consider the possibility of impacts for any European site which might be affected, whatever their location, given the activities included in the plan and their range of influence. This may extend some distance from the area within the immediate influence of a plan. For the Puttenham Neighbourhood Plan a buffer of 10km has been applied given the relatively small size of the neighbourhood area and it is considered that no pathways, including hydrological connections, exist that would impact upon any European sites beyond this extent.

There are no SPAs, SACs or Ramsar sites located within the neighbourhood area. There are three SPAs within 10km of the neighbourhood area. These sites are listed in Table 3.1 below, and shown on Figure 3.1. The neighbourhood area falls partially within 5km of the Thames Basin Heath SPA.

Details of European Sites within 10km buffer around the neighbourhood area are presented in Table 3.2.

Table 3.1: European Sites within and adjacent to the Puttenham Neighbourhood Area

<table>
<thead>
<tr>
<th>Designation</th>
<th>Site</th>
<th>Distance at closest point</th>
</tr>
</thead>
<tbody>
<tr>
<td>SPA</td>
<td>Thursley, Hankley and Frensham Commons (Wealden Heaths Phase 1)</td>
<td>1.6km</td>
</tr>
<tr>
<td>SPA</td>
<td>Thames Basin Heaths</td>
<td>3.7 km</td>
</tr>
<tr>
<td>SPA</td>
<td>Wealden Heaths Phase 2</td>
<td>6.01km</td>
</tr>
</tbody>
</table>
Figure 3.1: Location of European Sites within Puttenham Neighbourhood Area and a 10km buffer
Table 3.2: Details of European Sites within 10km buffer around Puttenham Neighbourhood Area (Information from JNCC, 2018; Natural England, 2018)

<table>
<thead>
<tr>
<th>European Site</th>
<th>Qualifying Features and Conservation Objectives</th>
</tr>
</thead>
</table>
| Thursley, Hankley and Frensham Commons (Wealden Heaths Phase 1) SPA | Qualifying Features:  
During the breeding season:  
- Dartford Warbler (*Sylvia undata*), 20 pairs (which represented 4% of the British breeding population in 1984).  
- Nightjar (*Caprimulgus europaeus*), 20 pairs (which represented 1% of the British breeding population in 1984).  
- Woodlark (*Lullula arborea*), 27 pairs (which represented 12% of the British breeding population in 1984).  
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. |
| Thames Basin Heaths SPA                             | Qualifying Features:  
During the breeding season:  
- Dartford Warbler *Sylvia undata*, 445 pairs representing at least 27.8% of the breeding population in Great Britain (Counts as at 1999)  
- Nightjar *Caprimulgus europaeus*, 264 pairs representing at least 7.8% of the breeding population in Great Britain (Count mean (1998-99))  
- Woodlark *Lullula arborea*, 149 pairs representing at least 9.9% of the breeding population in Great Britain (Count as at 1997)  
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. |
| Wealden Heaths Phase 2                              | Qualifying Features:  
During the breeding season: |
European Site | Qualifying Features and Conservation Objectives
---|---

- Dartford Warbler Sylvia undata, 16 pairs (5 year peak mean 1989-1993) which represented 1.7% of the GB population.
- Nightjar Caprimulgus europaeus, 43 pairs (5 year peak mean 1989-1993) which represented 1.4% of the GB population.
- Woodlark Lullula arborea, 15 pairs (5 year peak mean 1989-1993) which represented 4.3% of the GB population.

**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.

### 3.3.2 Potential impacts on the European Sites

Neighbourhood Plans, with the spatial planning policies they contain, can potentially have adverse impacts on the habitats and species for which European sites are designated. These impacts can be direct such as habitat loss, fragmentation or degradation, or indirect such as disturbance from recreational activities or pollution from construction and transportation.

This section identifies the potential hazards to European sites within the 10km buffer around the neighbourhood area which may arise as a result of the implementation of the Neighbourhood Plan, and then goes on to identify the types of hazards to which the qualifying features present within the sites are particularly sensitive.

### Qualifying Features and Sensitivity to Hazards

Table 3.3 below, shows the qualifying features of the European sites within the 10km buffer around the neighbourhood area and identifies the hazards to which they are potentially sensitive.

It must be noted that during the assessment of the potential impacts of the Neighbourhood Plan on a European site, all of the potential hazards will be considered.

**Table 3.3: Threats and pressures for each European site identified as potentially being affected by Puttenham NP**

<table>
<thead>
<tr>
<th>Threats and pressures</th>
<th>Thames Basin Heaths SPA</th>
<th>Thursley, Hankley and Frensham Commons SPA</th>
<th>Wealden Heaths Phase 2 SPA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Air pollution</td>
<td>√^ab_</td>
<td>√^ab_</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td>All qualifying features</td>
<td>All qualifying features</td>
<td></td>
</tr>
<tr>
<td>Biocenotic evolution, succession</td>
<td>√^a_</td>
<td>√^a_</td>
<td>-</td>
</tr>
</tbody>
</table>
Forestry and woodland/plantation management

<table>
<thead>
<tr>
<th>All qualifying features</th>
<th>All qualifying features</th>
</tr>
</thead>
</table>

Public access and sports/recreational activities

<table>
<thead>
<tr>
<th>All qualifying features</th>
<th>All qualifying features</th>
<th>All qualifying features</th>
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</thead>
</table>

Hydrological changes

<table>
<thead>
<tr>
<th>All qualifying features</th>
<th>All qualifying features</th>
<th>All qualifying features</th>
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</thead>
</table>

Grazing regime

<table>
<thead>
<tr>
<th>All qualifying features</th>
<th>All qualifying features</th>
</tr>
</thead>
</table>

Wildlife/arson

<table>
<thead>
<tr>
<th>All qualifying features</th>
<th>All qualifying features</th>
<th>All qualifying features</th>
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Habitat fragmentation

<table>
<thead>
<tr>
<th>All qualifying features</th>
<th>All qualifying features</th>
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</table>

Military activities

<table>
<thead>
<tr>
<th>All qualifying features</th>
<th>All qualifying features</th>
</tr>
</thead>
</table>

a - Indicates that this is highlighted as a threat / pressure in the relevant Natura 2000 Data Form
b - Indicates that this is highlighted as a threat in the relevant Site Improvement Plan
* - Indicates that this threat / pressure is also identified as a potentially positive impact on the relevant Natura 2000 Data Form

### 3.4 Other Relevant Plan and Projects that might act in–combination

A series of individually modest effects may in-combination produce effects that are likely to adversely affect the integrity of one of more European sites. Article 6(3) of the Habitats Directive tries to address this by taking into account the combination of effects from other plans or projects. The Directive does not explicitly define which other plans and projects are within the scope of the combination provision. Guidance in section 4.4.3 of ‘Managing Natura 2000 sites: The provisions of Article 6 of the ‘Habitats Directive 92/43/EEC’, published by the European Commission, states: ‘When determining likely significant effects, the combination of other plans or projects should also be considered to take account of cumulative impacts. It would seem appropriate to restrict the combination provision to other plans or projects which have been actually proposed’.

**Table 3.4** below lists the relevant plans and projects that have been identified as having the potential to result in adverse effects on European sites in-combination with the Puttenham Neighbourhood Plan.

**Table 3.4: Other Plans and Projects**
<table>
<thead>
<tr>
<th>Plan/Projects</th>
<th>Potential in-combination effects</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>National Planning Policy Framework (NPPF) (February, 2019)</strong></td>
<td>The NPPF sets out national planning policy to be taken into account by councils when preparing new local plans and making decisions on planning applications. In relation to conserving and enhancing the natural environment the NPPF states that the planning systems should contribute and enhance the natural and local environment through minimising impacts on biodiversity and providing net gains in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures. It also requires local planning authorities to set criteria based policies against which proposals for any developments on, or affecting, protected wildlife will be judged, with distinctions made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status. The presumption in favour of sustainable development, enshrined within the NPPF, does not apply where development requiring appropriate assessment under the Birds or Habitats Directives is being considered, planned or determined.</td>
</tr>
<tr>
<td><strong>Guildford Local Plan (2003) and Guildford Local Plan (2019)</strong></td>
<td>The Guildford Local Plan (2003) contains a number of policies relating to housing, infrastructure, cultural heritage, recreation and the environment. Once the Puttenham Neighbourhood Plan has been adopted or ‘made’ it will form part of the Development Plan alongside the Local Plan for Guildford. The Puttenham Neighbourhood Plan must conform with the Local Plan’s strategic policies in order to be adopted. The Guildford Local Plan 2019 does not allocate a housing target for the village of Puttenham, therefore no in-combination effects are likely to occur. The Guildford Local Plan has undergone a Habitats Regulations Assessment (AECOM, 2018). Additionally, the Plan contains a policy (P5) specifically related to the Thames Basin Heath SPA that states permission will not be granted for development proposals unless it can be demonstrated that doing so would not give rise to adverse effects on the ecological integrity of the Thames Basin Heaths SPA, whether alone or in-combination with other development (Guildford Borough Council, 2019).</td>
</tr>
<tr>
<td><strong>Thames Basin Heaths Special Protection Area Avoidance Strategy 2017 Supplementary Planning Document (Guildford Borough Council, 2017)</strong></td>
<td>This document was adopted on 18th July 2017 and replaces the earlier Thames Basin Heaths SPA Avoidance Strategy 2009-2016. Natural England has recognised that residential development across the South East region could have potentially adverse impact on the Thames Basin Heaths SPA through increased recreational use creating disturbance impacts. Guildford Borough Council, along with other councils where development has the potential to impact upon the SPA, have therefore adopted avoidance strategies in conjunction with Natural England, to identify where adverse impacts may arise and the avoidance and/or mitigation measures required. The avoidance strategy should prevent a situation arising where Local Authorities will not be able to grant planning permission for further residential development within 5km of these designated heathlands (the area identified as the Zone of Influence for cumulative impacts). This strategy therefore provides an assessment framework to identify where policies of the Puttenham Neighbourhood Plan may result in adverse impacts on the SPA and this is taken into account throughout this HRA. Although the Regional Spatial Strategy for the South East has now been partially revoked under the 2013 Localism Bill, policy NRM6 relating to the Thames Basin Heaths SPA was retained and remains a material consideration as part of development planning. This policy is linked to the Avoidance Strategy detailed above. Policy NRM6 relates to new residential development which is likely to have a significant effect on the ecological integrity of the Thames Basin Heaths SPA. The Puttenham Neighbourhood Plan will have to ensure that its policies are consistent with the requirements of policy NRM6.</td>
</tr>
</tbody>
</table>
3.5 Screening Assessment

This process identifies the likely impacts upon a European site of a project or plan, either alone or in combination with other projects or plans, and determines whether these impacts are likely to be significant. If no adverse impact is determined, the project or plan can proceed. If an adverse impact is identified, Task 2 is commenced.

This section considers the objectives identified in the Puttenham Neighbourhood Plan (March 2019) that are considered to have an impact on European Sites and identifies whether or not they are likely to have significant effects on site integrity, either alone or in-combination with other plans and/or projects, as detailed in Table 3.5.

Taking into account the location of the European Sites in relation to the neighbourhood area and the identified potential hazards associated with the objectives and policies of the Neighbourhood Plan, an assessment has been made as to whether the Neighbourhood Plan, alone and in-combination with other plans and/or projects, will have likely significant effects on any European Sites. This assessment is detailed in Table 3.5.
Puttenham Neighbourhood Plan HRA screening assessment

Table 3.5: Screening assessment of the Puttenham Neighbourhood Plan objectives and policies on European Sites

<table>
<thead>
<tr>
<th>Policies</th>
<th>Policy Summary</th>
<th>Assessment of likelihood of significant effects</th>
<th>Significant effects</th>
</tr>
</thead>
<tbody>
<tr>
<td>Land Use Policies</td>
<td><strong>P-GP1 - Puttenham Settlement Boundary and Development Principles</strong>&lt;br&gt;Sustainable development within the Puttenham Settlement Boundary will be permitted subject to compliance with national Green Belt policy and other relevant neighbourhood plan and Local Plan policies. Development proposals within the Surrey Hills Area of Outstanding Natural Beauty (AONB) will be required to demonstrate how they conserve the AONB, with reference to the Surrey Hills Management Plan. Development proposals in close proximity to the AONB will be required to demonstrate that they will not result in the loss of important public views to and from the AONB.</td>
<td>This policy would not be likely to create any pathways of impact onto European sites. It is unlikely to lead to likely significant effects on the SPA through increased recreational pressure. This policy is unlikely to have HRA implications.</td>
<td>None*</td>
</tr>
<tr>
<td>Transport and Infrastructure</td>
<td><strong>P-TI1 - Sustainable Transport</strong>&lt;br&gt;New development shall contribute towards the provision of sustainable forms of transport. New residential development of 5 dwellings or more shall make provision, where feasible, for publicly accessible footpaths or cycleways linking such developments with existing footpaths or cycleways in order to enhance safe linkages across the village.</td>
<td>This policy would not be likely to create any pathways of impact onto European sites. It is unlikely to lead to likely significant effects on the SPA through increased recreational pressure. This policy is unlikely to have HRA implications.</td>
<td>None*</td>
</tr>
<tr>
<td>Transport and Infrastructure</td>
<td><strong>P-TI2 – Parking</strong>&lt;br&gt;Off-street parking shall be provided on site to accommodate new development in accordance with the following absolute minimum standards: Studio/1 bedroom unit – 1 space 2 bedroom unit – 1.5 spaces 3 + bedroom unit – 2 spaces. Where planning permission is</td>
<td>This policy would not be likely to create any pathways of impact onto European sites. It is unlikely to lead to likely significant effects on the SPA through increased recreational pressure. This policy is unlikely to have HRA implications.</td>
<td>None*</td>
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<td>Policies</td>
<td>Policy Summary</td>
<td>Assessment of likelihood of significant effects</td>
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<tr>
<td><strong>Transport and Infrastructure</strong></td>
<td>required, the loss of off-street parking will not be permitted unless it can be demonstrated that an equivalent or improved capacity is provided elsewhere, that the existing provision is unsatisfactory or that the need for off-street parking capacity has been demonstrably reduced as a result of the implementation of the development proposal and would thus avoid harm to pedestrian and highway safety.</td>
<td>This policy would not be likely to create any pathways of impact onto European sites. It is unlikely to lead to likely significant effects on the SPA through increased recreational pressure. This policy is unlikely to have HRA implications.</td>
<td>None*</td>
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</tbody>
</table>
| **P-TI3 - Car Park Policy** | The site identified on Map TI3 is allocated for formal car parking provision. Proposals for a new car park for approximately 32 no. car parking spaces (including an appropriate number of disabled spaces) will be supported subject to the following:  
- Provision of associated landscaping  
- Ecological enhancements are provided where possible  
- The design is sensitive to its rural setting, including the use of appropriate surfacing (e.g. grasscrete or similar)  
- Preserving the openness and character of the Green Belt  
- Provision of electric vehicle charging points (where feasible)  
- Safe and suitable access arrangements to be agreed by the Local Planning Authority | This policy would not be likely to create any pathways of impact onto European sites. It is unlikely to lead to likely significant effects on the SPA through increased recreational pressure. This policy is unlikely to have HRA implications. | None* |
| **P-TI4 - Electric Vehicle Charging Points** | The installation of electric vehicle charging points as part of new developments requiring off street parking will be supported. | This policy would not be likely to create any pathways of impact onto European sites. It is unlikely to lead to likely significant effects on the SPA through increased recreational pressure. This policy is unlikely to have HRA implications. | None* |
| **Transport and Infrastructure** | P-TI5 - Communications Infrastructure  
1. All new residential or commercial development within | This policy would not be likely to create any pathways of impact onto European sites. | None* |
<table>
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<tr>
<td>1. Policies</td>
<td>the Neighbourhood Area will be expected to include the necessary infrastructure (where necessary) to allow future connectivity to high speed broadband/internet. 2. Where planning permission is required, new telecommunication infrastructure shall be permitted where sympathetically designed and camouflaged to avoid harm to the parish’s landscape and historic environment. Existing masts, buildings and other structures must be used in the first instance unless robust justification is provided to demonstrate the need for a new site.</td>
<td>It is unlikely to lead to likely significant effects on the SPA through increased recreational pressure. This policy is unlikely to have HRA implications.</td>
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</table>
| Housing | **P-HP1 - Affordable Housing**  
The Home Farm Barns site (HA1) is allocated for an affordable housing development and sites HA2-HA4 are allocated as Rural Exception housing sites… | A policy that supports small-scale housing developments within 5km of the SPA is likely to lead to significant effects on the SPA through increased recreational pressure. This policy is likely to require appropriate assessment to assess avoidance and mitigation measures. There is an established approach to mitigation and avoidance, which the appropriate assessment will be able to draw upon and it will very likely conclude that the policy will not lead to adverse effects on the integrity of the SPA and thus is compatible with European obligations². | Yes |
| Affordable Housing Allocations | **P-HA1 - Home Farm Barns**  
The Home Farm Barns is allocated for up to 2 affordable homes subject to a number of requirements, including the provision and funding of SANGs and a contribution towards SAMM, in accordance with the Council’s Thames Basin Heaths SPA | A policy that supports small-scale housing developments is likely to lead to significant effects on the SPA through increased recreational pressure due to the proposed site falling within the 5km zone of influence of the Thames | Yes |

² The Council’s view is that this approach is compatible with the recent People over Wind judgement from the European Court of Justice, notwithstanding paragraph 32 of the Neighbourhood Planning (General) Regulations 2012 (as amended)
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<tr>
<td>Avoidance Strategy</td>
<td>Basin Heath SPA. Although the policy includes requirements for the provision of SANGs and a contribution towards SAMM in accordance with the Council’s Thames Basin Heaths SPA Avoidance Strategy, it is deemed a mitigation measure necessary to protect the European site and therefore cannot be considered until HRA Task 3. Therefore, this policy is likely to require appropriate assessment to assess avoidance and mitigation measures. An appropriate assessment of this policy is required.</td>
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<tr>
<td>Affordable Housing Allocations</td>
<td>P-HA2 - Land on B3000 (Puttenham Golf Club) The land on B3000 (Puttenham Golf Club) is allocated as a Rural Exception Site for up to 5 affordable homes subject to a number of requirements, including: agreement on ecological scheme ensuring that existing habitats are preserved or enhanced where possible, that any loss of habitat and biodiversity on the site is adequately mitigated and that net ecological gains are provided where possible; and provision and funding of SANGs and a contribution towards SAMM, in accordance with the Council’s Thames Basin Heaths SPA Avoidance Strategy.</td>
<td>A policy that supports small-scale housing developments is likely to lead to significant effects on the SPA through increased recreational pressure due to the proposed site falling within the 5km zone of influence of the Thames Basin Heath SPA. Although the policy includes requirements for the provision of SANGs and a contribution towards SAMM in accordance with the Council’s Thames Basin Heaths SPA Avoidance Strategy, it is deemed a mitigation measure necessary to protect the European site and therefore cannot be considered until HRA Task 3. Therefore, this policy is likely to require appropriate assessment to assess avoidance and mitigation measures. An appropriate assessment of this policy is required.</td>
<td>Yes</td>
</tr>
<tr>
<td>Affordable Housing</td>
<td>P-HA3 - Land on Hook Lane The Land on Hook Lane, as</td>
<td>A policy that supports small-scale housing</td>
<td>Yes</td>
</tr>
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<td>Policies</td>
<td>Policy Summary</td>
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<tr>
<td><strong>Allocations</strong></td>
<td>defined on Map HA3 below, is allocated as a Rural Exception Site for up to 3 affordable homes subject to a number of requirements, including: agreement on ecological scheme ensuring that existing habitats are preserved or enhanced where possible, that any loss of habitat and biodiversity on the site is adequately mitigated and that net ecological gains are provided where possible; and provision and funding of SANGs and a contribution towards SAMM, in accordance with the Council's Thames Basin Heaths SPA Avoidance Strategy.</td>
<td>developments is likely to lead to significant effects on the SPA through increased recreational pressure due to the proposed site falling within the 5km zone of influence of the Thames Basin Heath SPA. Although the policy includes requirements for the provision of SANGs and a contribution towards SAMM in accordance with the Council’s Thames Basin Heaths SPA Avoidance Strategy, it is deemed a mitigation measure necessary to protect the European site and therefore cannot be considered until HRA Stage 2. Therefore, this policy is likely to require appropriate assessment to assess avoidance and mitigation measures. An appropriate assessment of this policy is required.</td>
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</table>
| **Affordable Housing Allocations** | P-HA4 – Corner of Lees Field, Seale Lane  
Corner of Lees Field, as defined on Map HA5 below, is allocated as a Rural Exception Site for up to 2 affordable homes subject to a number of requirements, including: agreement on ecological scheme ensuring that existing habitats are preserved or enhanced where possible, that any loss of habitat and biodiversity on the site is adequately mitigated and that net ecological gains are provided where possible; and provision and funding of SANGs and a contribution towards SAMM, in accordance with the Council’s Thames Basin Heaths SPA Avoidance Strategy. | A policy that supports small-scale housing developments is likely to lead to significant effects on the SPA through increased recreational pressure due to the proposed site falling within the 5km zone of influence of the Thames Basin Heath SPA. Although the policy includes requirements for the provision of SANGs and a contribution towards SAMM in accordance with the Council’s Thames Basin Heaths SPA Avoidance Strategy, it is deemed a mitigation measure necessary to protect the European site and therefore cannot be considered until HRA Stage 2. Therefore, this policy is likely to require appropriate assessment to assess avoidance and mitigation measures. An appropriate assessment of this policy is required. | Yes |
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<tr>
<td>Natural Environment</td>
<td><strong>P-NE1 - Natural Environment</strong>&lt;br&gt;The policy stipulates that the development proposals shall preserve and enhance the parish's natural environment and rural character, in particular with regard to the scenic and landscape qualities of the Surrey Hills Area of Outstanding Natural Beauty (AONB) and be supported by a Landscape Assessment (LA) and a Landscape and Planting Scheme (L&amp;PS).</td>
<td>appropriate assessment to assess avoidance and mitigation measures. An appropriate assessment of this policy is required.</td>
<td>None*</td>
</tr>
<tr>
<td>Natural Environment</td>
<td><strong>P-NE1 - Natural Environment</strong>&lt;br&gt;Development proposals shall preserve and enhance the parish's natural environment and rural character, in particular with regard to the scenic and landscape qualities of the Surrey Hills Area of Outstanding Natural Beauty (AONB). Development proposals for new dwellings outside of the Puttenham Settlement Boundary, as defined on Figure 3 above, must be supported by a Landscape Assessment (LA) and a Landscape and Planting Scheme (L&amp;PS) which demonstrate that the proposal has been sensitively designed to minimise its impact on the natural landscape.</td>
<td>This policy would not be likely to create any pathways of impact onto European sites. It is unlikely to lead to likely significant effects on the SPA through increased recreational pressure. This policy is unlikely to have HRA implications.</td>
<td>None*</td>
</tr>
<tr>
<td>Natural Environment</td>
<td><strong>P-NE2 - Dark Night Skies</strong>&lt;br&gt;Excluding householder planning applications, where planning permission is required for exterior lighting installations on land outside of the village settlement boundary, planning permission will only be granted where it is satisfactorily demonstrated that: (1) The external lighting is necessary for safety purposes or for the essential functioning of a...</td>
<td>This policy would not be likely to create any pathways of impact onto European sites. It is unlikely to lead to likely significant effects on the SPA through increased recreational pressure. This policy is unlikely to have HRA implications.</td>
<td>None*</td>
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<tr>
<td><strong>Natural Environment</strong></td>
<td><strong>P-NE3 - Trees and Hedgerows</strong> (1) Development proposals that result in the loss of trees (particularly those with high arboricultural, biodiversity and/or streetscape value) and hedgerows will be resisted unless it can be demonstrated that the removal is necessary due to poor health, that it poses a public safety risk or that the need for, and benefits of, the development clearly outweigh the loss. (2) Where the loss of a tree(s) is accepted in line with point (1) above, on-site replacement tree(s) of native species and the same biodiversity/arboricultural value will be sought in the first instance and approved by the Local Planning Authority through a landscape and planting scheme. Where this is not feasible or practical, a financial contribution to the provision of an off-site tree (located in an appropriate location within the parish) in line with the monetary value of the existing tree to be felled will be required. (3) If mature trees or hedgerows of special significance are removed within 12 months prior to a planning application, the planning authority may require replacement planting to be undertaken by the developer to compensate for the loss of such trees or hedgerows, unless it can clearly be shown that this is not feasible.</td>
<td>This policy would not be likely to create any pathways of impact onto European sites. It is unlikely to lead to likely significant effects on the SPA through increased recreational pressure. This policy is unlikely to have HRA implications.</td>
<td>None*</td>
</tr>
<tr>
<td><strong>Natural Environment</strong></td>
<td><strong>P-NE4 - Biodiversity</strong> Although Policy P-NE4-</td>
<td></td>
<td>None**</td>
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<tr>
<td>Policies</td>
<td>Policy Summary</td>
<td>Assessment of likelihood of significant effects</td>
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<tr>
<td>Environment</td>
<td>The parish’s biodiversity, and in particular biodiversity designations and protected species, will be protected and enhanced. New development should provide ecological enhancements where possible through incorporating new habitats, wildlife corridors and other biodiversity features. Proposals should facilitate linkages between sites of high biodiversity. Enhancements should support Biodiversity Opportunity Areas, as identified by Surrey Nature Partnership. New development must avoid harm to nature conservation interests and will only be allowed where the benefits of a scheme clearly outweigh the harm caused.</td>
<td>Biodiversity does aim to provide protection for designated sites within the neighbourhood area, it does not explicitly include requirements for the provision and funding of SANGs and a contribution towards SAMM in accordance with the Council’s Thames Basin Heaths SPA Avoidance Strategy (2017) for new development. As new development may imply windfall sites, in addition to development planned on sites allocated for affordable housing in the Puttenham Neighbourhood Plan, it is recommended to amend the wording of the Policy P-NE4 – Biodiversity to maintain consistency with policies for affordable housing sites allocations HA1-HA4, which specifically include the above requirements. Alternatively, there is a scope to include a generic policy in the Plan that would cover the whole Plan, stipulating that all new development proposals would need to demonstrate compliance with Guildford Local Plan Policy P5 and the Council’s Thames Basin Heaths SPA Avoidance Strategy (2017). Due to already existing requirement for the preparation of the Puttenham NP to be in general conformity with Guildford Local Plan and its strategic policies, it is deemed the conformity with Guildford Local Plan Policy P5 (2019) is met, therefore, no significant effects on</td>
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<td>Policies</td>
<td>Policy Summary</td>
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<tr>
<td><strong>Built Environment</strong></td>
<td><strong>P-BE1 – Design</strong> New development (including extensions to existing buildings) should be of high quality and appropriate to the scale, mass and form of the parish’s built environment, incorporating architectural features and materials that are sympathetic to the local character.</td>
<td>This policy would not be likely to create any pathways of impact onto European sites. It is unlikely to lead to likely significant effects on the SPA through increased recreational pressure. This policy is unlikely to have HRA implications.</td>
<td>None*</td>
</tr>
</tbody>
</table>
| **Built Environment** | **P-BE2 - Backland and Infill Development** Backland and infill development will only be permitted where it can be demonstrated that the proposal meets the following criteria:  
• Is of an appropriate scale and mass  
• Respects the local context and surrounding pattern of development in terms of density and plot width.  
• Retains appropriate separation between buildings  
• Retains appropriate garden space for adjacent dwellings  
And where the proposal would avoid an unacceptable on:  
• The character and appearance of the Puttenham Conservation Area  
• The amenity of neighbours  
• Parking and traffic congestion in the area  
• Loss of trees and biodiversity | This policy would not be likely to create any pathways of impact onto European sites. It is unlikely to lead to likely significant effects on the SPA through increased recreational pressure. This policy is unlikely to have HRA implications. | None* |
<p>| <strong>Built Environment</strong> | <strong>P-BE3 - Sustainable Development</strong> New development should be designed to the highest standard of energy and water efficiency with careful consideration being given to the orientation of the principal rooms in new dwellings so that | This policy would not be likely to create any pathways of impact onto European sites. It is unlikely to lead to likely significant effects on the SPA through increased recreational pressure. This policy is unlikely to have HRA implications. | None* |</p>
<table>
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<tbody>
<tr>
<td><strong>Built Environment</strong></td>
<td><strong>P-BE4 - Puttenham Conservation Area</strong>&lt;br&gt; (1) Development proposals should preserve and enhance the character and appearance of the Puttenham Conservation Area and its setting.&lt;br&gt; (2) Development proposals that cause substantial harm to the character and appearance of the Conservation Area and/or its setting will not be permitted unless justified through public benefits that demonstrably outweigh the harm.&lt;br&gt; (3) Proposals affecting the Puttenham Conservation Area should be supported by information which identifies the significance of the heritage asset and demonstrates how points (1) and (2) have been met.</td>
<td>policy is unlikely to have HRA implications.</td>
<td>None*</td>
</tr>
<tr>
<td><strong>Built Environment</strong></td>
<td><strong>P-BE5 - Listed Buildings</strong>&lt;br&gt; (1) Development proposals should conserve and enhance the architectural and historic significance of the parish’s listed buildings.&lt;br&gt; (2) Development proposals that cause substantial harm to the significance of a listed building should require clear and convincing justification and will only be permitted where the public benefits of the scheme demonstrably outweigh the harm identified.&lt;br&gt; (3) Proposals affecting Listed Buildings (including their setting) should be supported by information which identifies the</td>
<td>This policy would not be likely to create any pathways of impact onto European sites. It is unlikely to lead to likely significant effects on the SPA through increased recreational pressure. This policy is unlikely to have HRA implications.</td>
<td>None*</td>
</tr>
<tr>
<td>Policies</td>
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<td><strong>Community</strong></td>
<td><strong>P-RP1 - Existing Community Facilities</strong>&lt;br&gt;Development proposals that result in the loss of community facilities, including public open space, sports and recreational facilities and land (including playing fields) will not be permitted unless one or more of the following applies:&lt;br&gt;- an assessment has been undertaken which clearly demonstrates that the existing facility and associated land is surplus to requirements and that all efforts have been made to retain the current use or attract similar uses.&lt;br&gt;- the existing provision would be replaced by equivalent or better provision in terms of quantity, quality and location; or&lt;br&gt;- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.</td>
<td>This policy would not be likely to create any pathways of impact onto European sites. It is unlikely to lead to likely significant effects on the SPA through increased recreational pressure. This policy is unlikely to have HRA implications.</td>
<td>None</td>
</tr>
<tr>
<td><strong>Community</strong></td>
<td><strong>P-RP2 - Sports and Recreation Facilities</strong>&lt;br&gt;Development proposals for new or the improvement of existing sport, recreation and play facilities, including their accessibility and linkages, will be permitted where in accordance with other neighbourhood plan policies. Areas A-D on Figure 5 below are identified as appropriate areas for new sport and recreation facilities with a preference for outdoor gym facilities.</td>
<td>This policy would not be likely to create any pathways of impact onto European sites. It is unlikely to lead to likely significant effects on the SPA through increased recreational pressure. This policy is unlikely to have HRA implications.</td>
<td>None</td>
</tr>
<tr>
<td><strong>Community</strong></td>
<td><strong>P-RP3 – Allotments</strong>&lt;br&gt;Development proposals which include the provision of allotments will be supported in appropriate locations subject to accordance with other neighbourhood plan policies</td>
<td>This policy would not be likely to create any pathways of impact onto European sites. It is unlikely to lead to likely significant effects on the SPA through increased recreational pressure. This policy is unlikely to have HRA implications.</td>
<td>None</td>
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</table>
### 3.6 HRA Screening Conclusions

This HRA Screening Assessment has examined the Puttenham Neighbourhood Plan policies for any impacts on the European sites within the neighbourhood area or within 10km of the neighbourhood area.

There are no European sites within the Puttenham neighbourhood area. However, the upper half of the neighbourhood area (including the village of Puttenham and the proposed housing sites) lies within the 400m and 5km zone and the remainder of the neighbourhood area lies within the 5-7km buffer zone of the Thames Basin Heath SPA. Likely significant effects are identified for policies **P-HP1, P-HA1, P-HA3 and P-HA4**. Recommendations are also provided for policy **P-NE4**.

#### Recommendation 1

Several policies in the plan support development (as required by the basic conditions) by providing a framework within which development should be delivered. As a result, there is potential for these policies to have an impact on the Thames Basin Heaths SPA by delivering new housing within 5km of the SPA that results in increased recreational pressure. The housing site policies include a caveat that protects the SPA through provision of SANG and SAMM, but a similar measure is required for housing that could fall outside these sites (e.g. windfall housing).

It is recommended that the plan includes a general development policy that extends the SPA provisions set out in the site allocation policies to cover all housing developments. Alternatively, this provision could be added to P-GP1 which covers development principles.

**Whilst the plan is considered to meet the SEA and HRA regulations without this amendment, given the focus on HRA recently as a result of several European Court of Justice judgements, this amendment is suggested in order to remove any doubt about the lack of impacts on the SPA and therefore reduce the risk of challenge if the plan is adopted.**

#### Appropriate assessment need for policies HP1, HA1-HA4

The Plan includes policies HP1, HA1-HA4 that support small-scale housing developments. Although these policies include requirements for the provision and funding of SANGs and a contribution towards SAMM in accordance with the Council’s Thames Basin Heaths SPA Avoidance Strategy (2017), it is deemed a mitigation measure necessary to protect the European site and therefore cannot be considered until HRA Stage 2. Therefore, policies HP1, HA1-HA4 are likely to lead to significant effects on the SPA through increased recreational pressure on the Thames Basin Heath SPA and will require appropriate assessment to assess avoidance and mitigation measures.

To this end, an appropriate assessment of these policies will be carried out and presented in the next section of this report. There is an established approach to mitigation and avoidance, which the appropriate assessment will be able to draw upon and it will very likely conclude that these
policies will not lead to adverse effects on the integrity of the SPA and thus is compatible with European obligations.

3.7 Appropriate Assessment of Policies HP1, HA1-HA4

This appropriate assessment should be read in conjunction with the Puttenham Neighbourhood Plan Screening Assessment, which sets out additional background information relating to HRA, the SPA and approaches to avoidance and mitigation.

Policies P-HP1 and P-HA1 to P-HA4, if implemented without avoidance and/or mitigation measures, would lead to likely significant effects on the SPA through increased recreational pressure brought by new dwellings between 400m and 5km from the SPA. This matter is considered in the section below.

Potential for adverse effects on the integrity of the SPA

The SPA has been designated because it supports three species of birds that are protected under the Wild Birds Directive; Nightjar, Woodlark and Dartford Warbler. The conservation objectives for the site are to 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 three species
- The structure and function of the habitats of the three species
- The supporting processes on which the habitats of the three species rely
- The population of each of the three species, and
- The distribution of the three species within the site.

The northern part of the neighbourhood area falls within 5km of the SPA where any new net residential development is likely to have an impact on the SPA due to increased recreational pressure. The SPA is currently subject to high levels of recreational use that can lead to disturbance in the behavioural patterns of the three species, and consequently can reduce breeding success. Therefore, by supporting residential development in this zone, and without any appropriate avoidance and mitigation strategy in place, policies P-HP1 and P-HA1 to P-HA4 could lead to adverse effects on the integrity of the SPA through negative impacts on conservation objectives 1, 4 and 5.

Avoidance and mitigation measures

Policy NRM6 of the South East Plan and the Guildford Borough Council Thames Basin Heaths Special Protection Area Avoidance Strategy 2017 Supplementary Planning Document (the SPA strategy) set out an approach to avoidance and mitigation of the effects of increased recreational pressure. This is achieved through the provision of SANG to attract people away from the SPA and through the funding of the SAMM program which monitors the SPA and provides mitigation measures for the impact of visitors (including wardening, access management and education measures for SPA users).

SANGs provide an attractive natural or semi-natural environment and visitor experience equivalent to the SPA and in doing so prevent new dwellings bringing an increase in recreational pressure on the SPA by “soaking up” potential SPA visitors. In this way, adverse impacts on the integrity of the SPA from new residential developments within the 400m to 5 km zone are avoided.
The Council currently has a large amount of available SANG capacity across the borough. Under the terms of policy NRM6 and the SPA strategy developments of fewer than 10 dwellings, the size of development very likely to be covered by polices P-HP1 and P-HA1 to P-HA4, do not need to be within the catchment of any specific SANG. Therefore, it can be concluded that any development that goes ahead as a result of proposed policies P-HA1 to P-HA4 will be supported by appropriate SANG and that adverse effects on the integrity of the SPA will be avoided.

3.8 Conclusion

On the basis of the above appropriate assessment, the Council has determined that there will be no adverse effects on the integrity of the SPA as a result of the making of the Puttenham Neighbourhood Plan. Making the plan is therefore compatible with European obligations.

4. Puttenham Neighbourhood Plan SEA screening

4.1 SEA Screening Methodology

The methodology for the SEA screening assessment is set out in A Practical Guide to the Strategic Environmental Assessment Directive (ODPM, 2005).

To establish if a neighbourhood plan requires SEA, a screening assessment is required against a series of criteria set out in the SEA Directive. Figure 4.1 sets out the screening process and how a plan should be assessed against the SEA Directive criteria.

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3 The basis for this approach is that individually developments of less than 10 dwellings will not have a significant impact on the SPA and that this justifies a more flexible approach in terms of SANG location, but the cumulative impact should still be addressed. See the Thames Basin Heaths Special Protection Area Delivery Framework (TBH Joint Strategic Partnership Board, 2009).
Figure 4.1: Application of the SEA Directive to plans and programmes (from “A Practical Guide to the Strategic Environmental Assessment Directive”, ODPM, 2005.

Assessing the significance of the environmental effects that a Neighbourhood Plan will have depends on the policies within it. The criteria for assessing significance are referred to in Article 3.5 and set out within Annex II of the SEA Directive and is presented in Figure 4.2:
1. The characteristics of plans and programmes, having regard, in particular, to
   - The degree to which the plan or programme sets a framework for projects and other activities, either with regards to location, nature, size and operating conditions or by allocating resources;
   - The degree to which the plan or programme influences other plans and programmes including those in a hierarchy;
   - The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;
   - Environmental problems relevant to the plan or programme;
   - The relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. Plans and programmes linked to waste-management or water protection)
2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to
   - The probability, duration, frequency and reversibility of the effects;
   - The cumulative nature of the effects;
   - The transboundary nature of the effects;
   - The risks to human health or the environment (e.g. due to accidents);
   - The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);
   - The value and vulnerability of the area likely to be affected due to:
     - Special natural characteristics or cultural heritage;
     - Exceeded environmental quality standards or limit values;
     - Intensive land-use;
   - The effects on areas or landscapes which have a recognised national, Community or international protection status.

**Figure 4.2: Criteria for assessing significance**

The SEA screening assessment is therefore split into two parts. Part 1 runs the draft plan through the questions outlined in the diagram above and includes commentary of whether the need for SEA is triggered. Part 2 further assesses stage 8, on whether there is a likely significant impact. The screening opinion takes a ‘precautionary approach’ and when it is unclear as to how the Directive may be applied it is assumed that there are possible likely significant effects. An assessment of the characteristics of the Puttenham Neighbourhood Plan against these criteria is set out in Tables 4.1 and 4.2 of this report.
4.2 Part 1 – Application of the Directive to the draft Puttenham Neighbourhood Plan

Table 4.1. Establishing the need for SEA by following the flowchart in Figure 4.1

<table>
<thead>
<tr>
<th>Stage</th>
<th>Yes/No</th>
<th>Justification</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Is the PP (plan or programme) subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Art. 2(a))</td>
<td><strong>Yes</strong> (proceed to Q2)</td>
<td>The Puttenham Neighbourhood Plan is prepared by the parish council under the provision of the Town and Country Planning Act 1990 as amended by the Localism act 2011.</td>
</tr>
<tr>
<td>2. Is the PP required by legislative, regulatory or administrative provisions? (Art. 2(a))</td>
<td><strong>No</strong> (Yes when 'made' so proceed to Q3)</td>
<td>It is not a requirement for a parish to produce a Neighbourhood Plan. However, once &quot;made&quot; the plan forms part of the statutory Development Plan and will be used when making decision on planning applications.</td>
</tr>
<tr>
<td>3. Is the PP prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive? (Art 3.2(a))</td>
<td><strong>Yes</strong> Yes to both criteria (proceed to Q5)</td>
<td>The Puttenham Neighbourhood Plan is being prepared for town and country planning and land use. The Plan supports planning applications for small-scale housing developments, and does contain a general framework for future development consent and thus projects which could be listed in Annex II of the EIA Directive.</td>
</tr>
<tr>
<td>4. Will the PP, in view of its likely effects on sites require an assessment under Article 6 or 7 of the Habitats Directive? (Art. 3.2(b))</td>
<td>N/A</td>
<td>Not applicable as both criterion to Q3 answered &quot;Yes&quot;. However, potential significant impacts on the European sites are addressed further below (see question 8 and Table 2).</td>
</tr>
<tr>
<td>5. Does the PP determine the use of small areas at local level, OR is it a minor modification of a PP subject to Art. 3.2? (Art. 3.3)</td>
<td><strong>Yes</strong> (proceed to Q8)</td>
<td>The Neighbourhood Plan does allocate land for a specific purpose and show preference for the type and form of development at local level.</td>
</tr>
<tr>
<td>6. Does the PP set the framework for future development consent of projects (not just projects in annexes to the EIA Directive)? (Art 3.4)</td>
<td>N/A</td>
<td>Not applicable as both criterion to Q5 answered &quot;No&quot;. However, the Neighbourhood Plan does direct a small-scale development to general locations such as in-fill plots and previously developed land within the three settlements which alongside the inclusion of policies to protect green spaces, village character and the environment will not cause rise to significant environmental effects.</td>
</tr>
<tr>
<td>7. Is the PP’s sole purpose to serve the national defence or civil emergency, OR is it a financial or budget PP, OR is it</td>
<td>N/A</td>
<td>The Neighbourhood Plan is not prepared for any of the purposes opposite.</td>
</tr>
</tbody>
</table>
4.3 Part 2 – Likely significant effects on the environment

Criteria for determining the likely significance of effects referred to in Article 3(5) of Directive 2001/42/EC are set out below, together with a commentary on whether the draft Puttenham Neighbourhood Plan would trigger the need for a full assessment.

Table 4.2: Assessing Likely Significant Effects (LSE)

<table>
<thead>
<tr>
<th>SEA Directive Criteria</th>
<th>Yes/No</th>
<th>Justification</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. The Characteristics of Plans and Programmes, having regard, in particular, to:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>a) The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources</td>
<td>No</td>
<td>The Puttenham Neighbourhood Plan sets out a vision for the parish which can be used to influence the outcome of future planning applications, consistent with the needs and expressed opinions of residents, The Plan does allocate specific land for small-scale development.</td>
</tr>
<tr>
<td>b) The degree to which the plan or programme influences other plans and programmes including those in a hierarchy</td>
<td>No</td>
<td>The Puttenham Neighbourhood Plan covers a small, defined parish within the context of the Guildford Local Plan area. The Neighbourhood Plan will be in general conformity with the strategic policies of the Guildford Local Plan and the NPPF (2019). Once adopted/made' the Neighbourhood Plan will form part of the Development Plan for Guildford borough. If the Puttenham Neighbourhood Plan is not delivered, the Guildford Local Plan is not affected. The Guildford Local Plan was subject to SA/SEA process.</td>
</tr>
<tr>
<td>c) The relevance of the plan or programme for the integration of environmental</td>
<td>No</td>
<td>Throughout the Puttenham Neighbourhood Plan, integration of environmental considerations and promotion of sustainable development is central to the specific objectives and policies. The Plan seeks</td>
</tr>
<tr>
<td>SEA Directive Criteria</td>
<td>Yes/No</td>
<td>Justification</td>
</tr>
<tr>
<td>------------------------</td>
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<tr>
<td>considerations in particular with a view to promoting sustainable development</td>
<td></td>
<td>to promote sustainable development overall and does not seek any relaxations to sustainable development principles set out in higher-level plans. The Puttenham Neighbourhood Plan includes specific policies relating to the protection of the natural environment. The Puttenham Neighbourhood Plan does not seek to address any significant environmental problems in the area.</td>
</tr>
<tr>
<td>d) Environmental problems relevant to the plan or programme</td>
<td>No</td>
<td>Puttenham Neighbourhood Area is approximately 3.7 km from the Thames Basin Heaths SPA site, 1.6 km from the Thursley, Hankley and Frensham Commons SPA (Wealden Heaths Phase 1), and 6.01 km from the Wealden Heaths Phase 2 SPA. The Puttenham Neighbourhood Plan does allocate specific land for small-scale development that falls within the SPA 5km zone of influence and thus will be carried out in conformity with GBC’s Thames Basin Heaths Special Protection Area Avoidance Strategy (2017). The Appropriate Assessment on site specific policies for affordable housing HP1, HA1-HA4 concluded that there will be no adverse effects on the integrity of the SPA as a result of the making of the Puttenham Neighbourhood Plan (see Sections 3.5-3.6). At this stage it is considered that the Puttenham Neighbourhood Plan will not introduce any environmental problems, rather it will seek to encourage sensitive development in relation to the environment through integration of environmental protection measures within a number of the policies of the Plan. Consequently, it is not considered that it will have significant environmental effects.</td>
</tr>
<tr>
<td>e) The relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste management or water protection)</td>
<td>No</td>
<td>The Puttenham Neighbourhood Plan will not affect implementation of European Community environmental legislation. The Water Framework Directive will need to be taken into account. The Puttenham Neighbourhood Plan supports the implementation of higher-level policies at the Neighbourhood Area level. It is therefore not considered to have significant influence on other plans and programmes or their effects on the environment.</td>
</tr>
</tbody>
</table>

2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:

<p>| a) The probability, duration, frequency and reversibility of the effects | No | The Puttenham Neighbourhood Plan does allocate land for small-scale development, and directs the type, scale and form of any small-scale future development. The Plan is supportive of sustainable development within the overall protective policy context of the Guildford Local Plan in terms of the built and natural environment. The significant effects are considered to be unlikely. |</p>
<table>
<thead>
<tr>
<th>SEA Directive Criteria</th>
<th>Yes/No</th>
<th>Justification</th>
</tr>
</thead>
<tbody>
<tr>
<td>b) The cumulative nature of the effects</td>
<td>No</td>
<td>The Puttenham Neighbourhood Plan does allocate specific land for development and direct small-scale development that falls within the SPA 5km zone of influence which along with residential developments elsewhere in the wider area have the potential to cumulatively adversely impact on the Thames Basin Heaths SPA and a number of SSSIs, through increased visitor pressures. This has been assessed further as part of a Habitats Regulations Screening Assessment and the subsequent Appropriate Assessment (see Chapter 3), which concludes that the affordable housing polices will not lead to adverse effects on the integrity of the SPA and thus is compatible with European obligations.</td>
</tr>
<tr>
<td>c) The transboundary nature of the effects</td>
<td>No</td>
<td>No significant transboundary effects of the policies contained within the Puttenham Neighbourhood Plan are anticipated given that they focus on small-scale areas within the neighbourhood area itself. Furthermore, Neighbourhood Plans are required to relate to discrete administrative areas. By definition, “transboundary” issues are “strategic” matters; therefore beyond the scope of a Neighbourhood Plan.</td>
</tr>
<tr>
<td>d) The risks to human health or the environment (e.g. due to accidents)</td>
<td>No</td>
<td>The Puttenham Neighbourhood Plan does not create any significant risks to human health or the environment.</td>
</tr>
<tr>
<td>e) The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)</td>
<td>No</td>
<td>The Puttenham Neighbourhood Plan covers the parish of Puttenham. The magnitude and spatial extent of the Neighbourhood Plan is limited and will not have significant environmental effects across or outside of this geographical area.</td>
</tr>
<tr>
<td>f) The value and vulnerability of the area likely to be affected due to: (i) special natural characteristics or cultural heritage, (ii) exceeded environmental quality standards or limit values, (iii) intensive land-use,</td>
<td>No</td>
<td>Puttenham village contains numerous historic buildings, in particular along The Street, many of which are listed. The historic core of the village is designated as a Conservation Area. There are 33 Listed Buildings in the neighbourhood area including two Grade II* Listed Buildings, these being Puttenham Priory and St Johns the Baptist Church. The majority of listed buildings lie within the historic core of Puttenham village but 13 Grade II Listed Buildings lie outside of the Conservation Area in the rural parts of the neighbourhood area. There are also 10 Areas of High Archaeological Potential in the neighbourhood area, notably the historic core of the village. There are also a number of other AHAPs on the edge of the neighbourhood area. Proposed development for small-scale affordable housing is likely to prevent impact upon the wider landscape but could affect Conservation Area or the setting of listed buildings. However, the Plan seeks to prevent these impacts and uphold other</td>
</tr>
</tbody>
</table>
### Part 2 Overall Conclusion

The **Puttenham Neighbourhood Plan is unlikely to have significant effects on the environment.**

### 4.4 SEA Screening Assessment Conclusion

Preparation of a Neighbourhood Plan for Puttenham is being undertaken in accordance with the Neighbourhood Planning Regulations 2012. The plan covers the period 2019 - 2033 and sets out a vision for the neighbourhood area and supports small-scale housing developments consistent with the objectively assessed need and expressed opinions of residents. Within the plan there are three themes covered with specific objectives, beneath which sit a number of policies relating to the affordable housing, transport and infrastructure, natural environment, building design and community.

This SEA Screening Report, supported by a Habitats Regulations Screening Assessment, as well as the findings of the Appropriate Assessment of the Plan policies deemed having significant effects on the European sites, has identified whether or not the Puttenham Neighbourhood Plan requires a SEA by assessing the potential high-level environmental impacts that may arise from implementation of the plan.

In conclusion, it is considered that the Puttenham Neighbourhood Plan does not require a SEA. This is primarily because the nature, scale and location of the policies within the plan are not likely to adversely impact on any of the sensitive environmental receptors within or around Puttenham neighbourhood area.

This conclusion will be sent to the Environment Agency, Natural England and Historic England for consideration and their responses will be included in the final screening SEA and HRA report.

<table>
<thead>
<tr>
<th><strong>SEA Directive Criteria</strong></th>
<th><strong>Yes/No</strong></th>
<th><strong>Justification</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>g) The effects on areas or landscapes which have a recognised national, Community or international protection status.</td>
<td>No</td>
<td>It is not anticipated that the Puttenham Neighbourhood Plan will adversely impact on the Thames Basin Heaths SPA, Thursley, Hankley and Frensham Commons SPA (Wealden Heaths Phase 1), Wealden Heaths Phase 2 SPA, as well as SSSIs and/or other areas/landsapes of community importance, as detailed above. Furthermore, the policies include the protection of green space, biodiversity, landscape, community assets and it is likely that the Plan will be positive by maximising the positive environmental effects of development and minimising or avoiding negative impacts. The Plan would support small-scale housing only so risks to the protected sites are deemed minimal.</td>
</tr>
</tbody>
</table>
5. HRA and SEA Screening Consultation

Guildford Borough Council is required to consult on all SEA screening opinions with Historic England, the Environment Agency and Natural England, and with Natural England on all HRA screening opinions, before formally determining whether a strategic environmental assessment and/or appropriate assessment is needed. The plan is currently at a very early stage and could be subject to change that alters the outcome of the screening opinion. As a result, the Council will reserve the consultation stage for a later stage; a formal screening opinion will be produced and consulted upon before the plan is submitted to the Council.

Once the consultation period with the consultation bodies is over, a determination will be made and a statement of reasons will be written and made available. A notice of the determination will be available for public access within 28 days of the date of the determination (in line with SEA Regulation 11). Should the determination be ‘negative’ then a statement of reasons will be prepared to submit to the Local Planning Authority (LPA) alongside the submission plan.

This report will be sent to the three statutory consultees (Environment Agency, Historic England and Natural England) to seek their views on its contents. Their responses will later be included in the final screening report.

It is a basic condition of producing a Neighbourhood Plan that EU obligations, as incorporated into UK law, are met. This includes those of the SEA and HRA Directives. The Puttenham neighbourhood group will be able to use the pre-submission formal screening opinion to produce the Basic Conditions statement.

Background Documents

- Conservation of Habitats and Species Regulations 2017
- Guildford Borough Council Thames Basin Heaths Special Protection Area Avoidance Strategy 2017 SPD
- The South East Plan, Policy NRM6