

Waverley Borough Council

## Appropriate Assessment Proforma

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### Case Officer:

### 1. Proposed Development Background

1.1 Planning Application Number: WA/2018/1815

Address: LAND OPPOSITE MILFORD GOLF CLUB, STATION LANE, MILFORD

Description: Outline application for up to 200 dwellings (including 60 affordable) with access to be determined, with provision of SANG (Suitable Alternative Natural Greenspace) and associated infrastructure.

1.2 The scheme will deliver up to 200 net new dwellings.

1.3 The scheme will deliver no new employment/ industrial space.

1.4 The proposal is located within:

- 5km of the Wealden Heaths Phase I SPA

<b>Proforma number</b>	
B1	<i>The scheme is for residential development. [Go to B3]</i>
B3	<i>Does the scheme result in a <u>net</u> increase in housing?  Yes</i>

## 2. Wealden Heaths Phase I (Thursley, Hankley & Frensham Commons) Special Protection Area and Ramsar site

- 2.1 Within Waverley Borough the Wealden Heaths Phase I Special Protection Area (SPA) overlap other European and International sites, namely Ramsar (Thursley and Ockley Bogs Ramsar site) and Special Area of Conservation (SAC) (Thursley, Ash, Purbright and Chobham SAC) components, which are entirely contained within the Wealden Heaths Phase I SPA. All of the European designated sites within Waverley are underpinned by the Thursley, Hankley and Frensham Commons Sites of Special Scientific Interest (SSSI).
- 2.2 These commons together incorporate a heath and valley mire complex. Thursley Common is a National Nature Reserve managed by Natural England and Frensham and Witley Commons are managed by the National Trust. A large part of the site is owned by the MoD (Hankley Common and Ockley Common), being regularly used for military activities and informal recreation. All components of this SPA lie within Waverley Borough.
- 2.3 This extensive site represents some of the finest remaining heathland on the Lower Greensand in Southern England. The valley mire on Thursley Common is regarded as one of the best in Britain. The site is of national importance for its bird, reptile and invertebrate populations.
- 2.4 Hankley Common has the most extensive tracts of dry heath, but the habitat is also well represented on the other Commons. Peatland is of greatest value on Thursley Common, but on the other commons is less extensive but still important. The site is one of the richest for birds in Southern England. Breeding birds specifically associated with the heathland include woodlark, Dartford warbler, and nightjar.
- 2.5 Wealden Heaths Phase I SPA is designated for its breeding populations of:
- Nightjar *Caprimulgus europaeus*;
  - Woodlark *Lullula arborea*; and
  - Dartford warbler *Sylvia undata*.
- 2.6 Thursley and Ockley Bog Ramsar site is designated for:
- The site supports a community of rare wetland invertebrate species including notable numbers of breeding dragonflies.
  - It is one of the few sites in Britain to support all six native reptile species. The site also supports nationally important breeding populations of European *nightjar Caprimulgus europaeus* and woodlark *Lullula arborea*.

## 2.7 Recreational Pressure

- 2.8 Around Thames Basin Heaths SPA the scale of existing residential development within 5km is already high and there are long-standing concerns about the impact of new residential development on the SPA. However, the same pattern of historic development intensity does not apply to the Wealden Heaths Phase I (Thursley, Hankley and Frensham Commons) SPA, which applies a 5km catchment for the purposes of comparison. The number of dwellings within 5km is an order of magnitude smaller around the Wealden Heaths Phase I (Thursley, Hankley and Frensham Commons) SPA. Moreover, the scale of new housing expected within 5km the Wealden Heaths Phase I SPA is much smaller than that expected around the Thames Basin Heaths SPA. This means that a) the Wealden Heaths Phase I SPA is currently under much lower pressure from residential development than the other two SPAs and b) the expected future change in development density is also much lower.

Paragraph 16.28 of the Local Plan Part 1 states: 'In addition, if a housing proposal is capable of affecting the Wealden Heaths Phase I and II SPAs beyond 400 metres from the site, it will

*be considered on a case-by-case basis as to whether a project-specific Habitats Regulations Assessment (HRA) is required (this should be assessed at the HRA Screening Assessment stage). The requirement is likely to vary depending on the size of site, the 'in-combination' effects and its distance from the SPA.'* In these instances Natural England may require consultation.

## 2.9 Urbanisation

- 2.10 The delivery of large amounts of new development within 400m of a European site designated for nightjar, woodlark and Dartford warbler could result in adverse effects on the integrity of that site. Around Thames Basin Heaths SPA the scale of existing residential development within 400m is already high; as such, it was considered that a policy specifically prohibiting further net residential development within 400m was required, otherwise historic development patterns indicated that a large amount of further residential development would come forward in that zone, exacerbating the existing situation. However, the same pattern of historic development intensity does not apply to the Wealden Heaths Phase I (Thursley, Hankley and Frensham Commons) SPA. The number of dwellings within 400m is 400-500% smaller around the Wealden Heaths Phase I (Thursley, Hankley and Frensham Commons) SPA, even adjusted for the greater size of the Thames Basin Heaths SPA.
- 2.11 The Wealden Heaths Phase I (Thursley, Hankley and Frensham Commons) is a smaller SPA than the Thames Basin Heaths, but is also un-fragmented, consisting of four very large blocks of habitat. In general this means that its designated bird populations are much less vulnerable to edge effects than the designated bird populations of the Thames Basin Heaths.
- 2.12 This means that a) the Wealden Heaths Phase I SPA is currently under much lower pressure from residential development immediately surrounding the site than the Thames Basin Heaths SPAs and b) there is a much lower likelihood of anything other than small quantities of further residential development coming forward within the 400m zone, thus rendering a policy completely prohibiting net residential development within that zone unnecessary; rather, the likely scale is such that impacts can be evaluated on a case-by-case basis as applications come forward.
- 2.13 Natural England request that the number of new dwellings being granted permission within 5km of the Wealden Heaths Phase I SPA is monitored. This is also reflected in Local Plan Part 1 paragraph 16.28.

## 2.14 Wealden Heaths Phase I (Thursley, Hankley & Frensham Commons) SPA and Ramsar site: Recreational Pressure/Urbanisation

Proforma number	Question
THFC1	The proposed residential scheme is to provide a <u>net</u> increase in residential development that is located between:
	<p>Between 400m and 5km from Wealden Heaths Phase I SPA and Ramsar site</p> <p>The Local Plan does not outline a quantum of net new dwellings within this distance from Wealden Heaths Phase I SPA and Ramsar site.</p> <p>The development would be serviced by an on-site SANG, located to the north of the site, which is considered to mitigate the residential harm to the SPA. The SANG to be provided forms part of the current planning application. The SANG would be secured through a Section 106 Agreement which would require the delivery of the SANG prior to first occupation of the units approved.</p>



**2.15 Wealden Heaths Phase I SPA and Ramsar site: Appropriate Assessment: Additional Impact Pathways**

Owing to the distance of the development from Wealden Heaths Phase I SPA and Ramsar site, the proposed development will not result in an adverse effect on the integrity of the European site due to any other additional impact pathways such as noise, atmospheric pollution or light (separate to urbanisation and recreational pressure).

*OR complete table below*

<b>THFC2</b>	<p>1. There is a need to consider other impact pathways (i.e. not recreational pressure and urbanisation) that could link the proposed development to the Wealden Heaths Phase I SPA and Ramsar site; for example (but not limited to): noise, atmospheric pollution, and light disturbance. This assessment will draw upon supporting documents provided by the applicant.</p>
	<p>a. Noise:</p> <p>The resultant development is not considered to result in a level of noise that would to the detriment of the SPA. Any noise created during the construction process would be temporary and controlled by a Construction Environmental Management Plan.</p>
	<p>b. Atmospheric pollution:</p> <p>The site is not located within an AQMA. Notwithstanding this, any likely impact on air quality would be transient and short term during the construction process. Any likely impact could be controlled by a Construction Environmental Management Plan.</p>
	<p>c. Light disturbance:</p> <p>The resultant development is not considered to result in a level of light disturbance that would negatively impact on the SPA. The lighting on site would be controlled by way of a lighting scheme and any additional lighting during the construction process by way of a Construction Environmental Management Plan.</p>
	<p>d. Hydrology:</p> <p>It is considered that any impact to ground levels and hydrology of the site would be likely contained to the site and there would be no resultant wider material impact.</p>
	<p>e. Direct loss of site:</p> <p>The proposed development is an allocated site adopted as part of the Waverley Local Plan Part 1. The compatibility of the use is therefore considered to be acceptable.</p>
	<p>The competent authority <b>is content</b> with the documentation provided by the applicant is sufficient to demonstrate that the proposed development will not result in an adverse effect on the integrity of the European site (separate to urbanisation and recreational pressure).</p>

FINAL

	<p>It is concluded that the development will not affect the integrity of the European site either alone or in combination with other plans and projects in relation to additional impact pathways (i.e. not including urbanisation and recreational pressure effects)</p>
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