

Tatsfield Neighbourhood Plan
Habitat Regulations Assessment
Stage 1: Screening

Tandridge District Council - April 2020

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EXECUTIVE SUMMARY

0.1 This report has considered the impact that the Tatsfield Neighbourhood Plan could have on the Ashdown Forest SAC/SPA and the Mole Gap to Reigate Escarpment SAC as part of *Stage 1: Screening* of the Habitat Regulations Assessment (HRA). In doing so it has taken into consideration the nature of the sites and the reasons for their respective designations, whilst also having regard to the precautionary principle and the in-combination effect with other plans.

0.2 At this stage, based on the precautionary principle, it can be determined that the Neighbourhood Plan would **not** have any likely significant effects on the International Habitats Sites, in combination with other plans and programmes. The factors which can be screened out are:

Ashdown Forest SAC and SPA

- Risk of increase air pollution at the Ashdown Forest.
- Risk of increase in recreational disturbance at the Ashdown Forest SPA, affecting the ground nesting birds.

Mole Gap to Reigate Escarpment SAC

- Risk of increase in air pollution ;
- Risk of increase in recreational disturbance, affecting the chalk grassland; and
- Risk of increase in water pollution

0.3 As such, at this stage and based on current assumptions regarding development levels and location, it is **not** necessary to proceed to the next stage of the HRA process, *Stage 2: Appropriate Assessment*.

0.4 However, the District Council reserves the right to review the need for Appropriate Assessment as the Neighbourhood Plan's exact intentions regarding type, scale and location of development becomes clearer; and also in light of any emerging technical evidence.

1. INTRODUCTION

- 1.1 The purpose of the Habitats Regulations Assessment (HRA) of land use plans is to ensure that consideration is given to sites protected by European Directives as part of the development of planning policy.
- 1.2 This HRA is conducted in support the Tatsfield Neighbourhood Plan (hereafter referred to as Neighbourhood Plan).
- 1.3 The HRA is a staged process, essentially iterative, being revisited as necessary in response to more detailed information, recommendations and any relevant changes to the plan or project until no significant adverse effects remain. This report presents the findings of *Stage 1: Screening*. The purpose of this HRA stage 1 is to identify potential significant adverse effects on protected *Natura 2000* sites (known in this report as International Habitats Sites) by policies of the emerging Local Plan.
- 1.4 There are no International Habitats Sites within the Neighbourhood Plan area, nor within the wider Tandridge District. However, the Mole Gap to Reigate Escarpment SAC in neighbouring Reigate & Banstead DC is of sufficient proximity that it needs to be considered as part of the HRA process.
- 1.5 This document has been prepared by Tandridge District Council.

Structure of the Document

- 1.6 This report is in 6 parts and consists of this introduction and the following sections:
 - **Section 2** provides contextual information on both the Local Plan itself and the requirement to undertake a HRA for the Local Plan;
 - **Section 3** describes the HRA process;
 - **Section 4** reviews the information needed to undertake *Stage 1: Screening*;
 - **Section 5** presents the findings of *Stage 1: Likely significant effects ('Screening')*;
 - **Section 6** details the report's conclusions.

2. CONTEXT

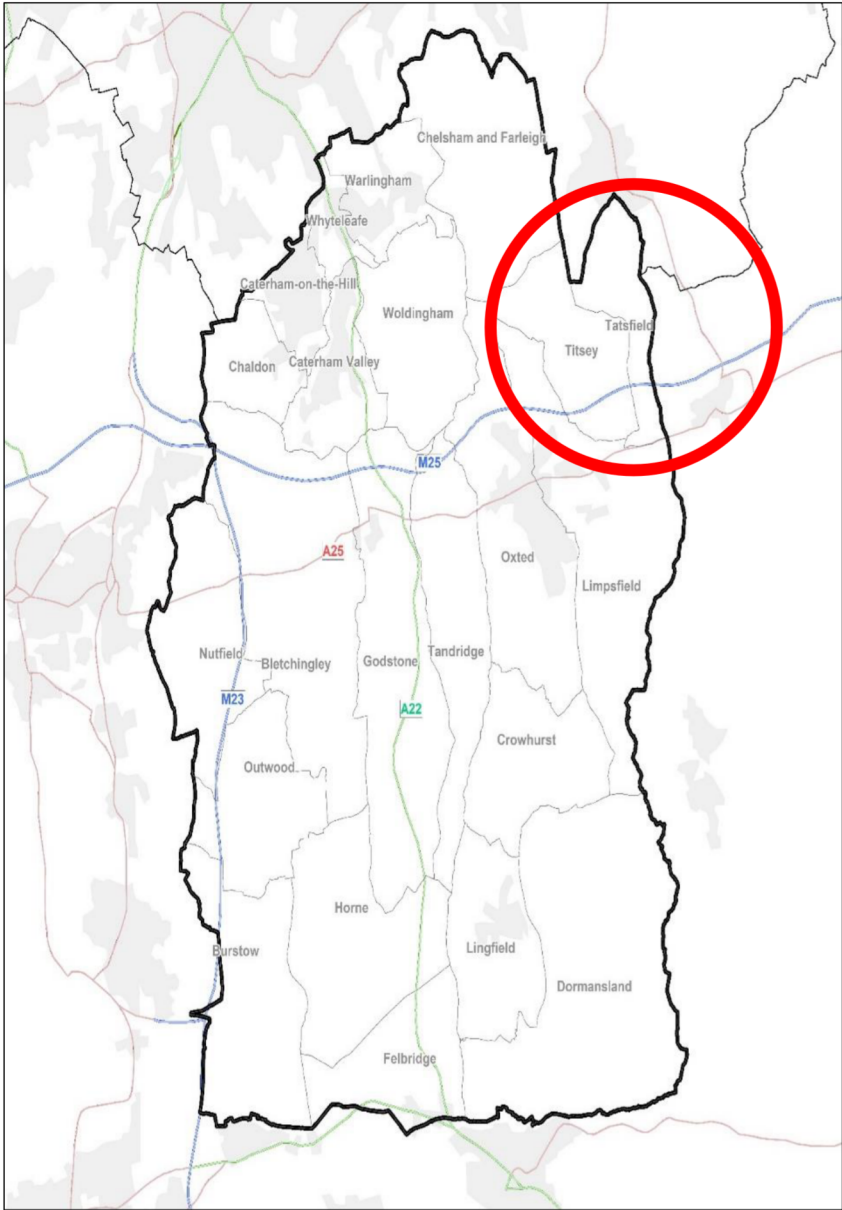
Tatsfield Parish

- 2.1 Tatsfield Parish is located in the north-east corner of the District abutting neighbouring Sevenoaks District Council in Kent, and Bromley Borough Council in Greater London. It is situated just south of Biggin Hill in neighbouring Bromley Borough. Tatsfield has a population of about 1,600 and is identified as a 'Rural Settlement' (Tier 3) in the Council's emerging Local Plan. The village has retained a rural character which is assisted by the varied topography and woodland in the area. It has a basic level of services with good community facilities, local shops and education provision. The nearest GP surgery to Tatsfield is Stock Hill Surgery located at Biggin Hill, approximately 2km to the north.
- 2.2 In terms of travel, whilst Tatsfield is not directly connected to the Strategic Road Network, it is not far from the A233 to Biggin Hill and bus services also operate via Tatsfield to both Biggin Hill (4 miles) and Westerham (3 miles). There are no Tandridge employment areas in Tatsfield, although there are more employment opportunities in neighbouring Biggin Hill in the London Borough of Bromley.

The Tatsfield Neighbourhood Plan

- 2.3 The Tatsfield Neighbourhood Plan ('the Neighbourhood Plan') covers the parish of Tatsfield (see Map 1). The Tatsfield Neighbourhood Forum is the Qualifying Body.
- 2.4 Tatsfield Parish Council advise that the Neighbourhood Plan is likely to allocate sites for development. Their current preferred option is for 44 dwellings across four allocations, three of which will be greenfield exception sites within the Green Belt.
- Contain policies that may affect sensitive natural or heritage listed assets (listed buildings and High Weald ANOB) located in or in proximity to the Neighbourhood Area
 - Have other significant environmental effects that have not already been considered and dealt with through an up-to-date Sustainability Appraisal of the Local Plan

Map 1: Tatsfield Parish within Tandridge District



HRA Legislation and Regulations

- 2.16 As part of the process of developing the Neighbourhood Plan, the relevant European¹ and national legislation and regulations must be adhered to. Such obligations include Council Directive 92/43/EEC on the Conservation of Natural Habitats and of wild flora and fauna – most commonly referred to as the Habitats Directive.
- 2.17 Of particular relevance to plan-making is article 6(3) of the Habitats Directive, which states that:
- “Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site’s conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public.”*
- 2.18 The Conservation of Habitats and Species Regulations 2010 (“Habitat Regulations”) transpose Council Directive 92/43/EEC, on the conservation of natural habitats and of wild fauna and flora (EC Habitats Directive), into national law. They also transpose elements of the EU Wild Birds Directive in England and Wales. The Conservation of Habitats and Species Regulations 2017 and the Conservation of Habitats and Species and Planning (England and Wales) Regulations 2018 consolidate the Conservation of Habitats and Species Regulations 2010 with subsequent amendments
- 2.20 A Habitats Regulations Assessment (HRA) determines whether there will be any ‘likely significant effects’ (LSE) on any European site as a result of a plan’s implementation (either on its own or ‘in combination’ with other plans or projects) and, if so, whether these effects will result in any adverse effects on the site’s integrity.

International Habitats Sites

- 2.21 The HRA report will consider relevant European sites which consist of:
- Special Areas of Conservation (SAC) – sites designated to provide increased protection to a variety of wild animals, plants and habitats.
 - Special Protection Area (SPA) – sites designated for the breeding, feeding, wintering or the migration of rare and vulnerable species of birds found within EU countries.

¹ The UK decision to leave the European Union does not result in an immediate removal of EU policy or legislation and compliance with relevant legislation remains necessary until such time as it is replaced, amended or revoked.

- 2.22 It is also Government policy for sites designated under the Convention on Wetlands of International Importance (Ramsar sites) to be treated as having equivalent status to European sites (although in practice there are no Ramsar sites that are necessary to consider as part of the Council's HRA process).
- 2.23 For the remainder of this report, for the sake of simplicity, the different types of sites which the HRA must consider will be collectively known as 'International Habitats Sites'.
- 2.24 A number of key documents have informed this screening report, including:
- Department for Communities and Local Government consultation paper on Appropriate Assessment of Plans (2006)
 - DEFRA 'The Habitats and Wild Birds Directives in England and its seas - Core guidance for developers, regulators & land/marine managers December 2012 (draft for public consultation)
 - European Commission "Assessment of plans and projects significantly affecting Natura 2000 sites";
 - The National Planning Policy Framework (2012);
 - Circular 06/2005 Biodiversity and Geological Conservation - statutory obligations and their impact within the planning system (although Planning Policy Statement 9 has been superseded the Circular remains in force);
 - Natural England's guidance notes on HRA; and
 - Guidance on HRA of plans produced by RSPB.

3. STAGES OF THE HABITATS REGULATIONS ASSESSMENT PROCESS

- 3.1 Best practice has demonstrated that Local Plans should be subjected to HRA at the earliest possible stage in their production to enable any potential significant effects to be identified and mitigated early on in the plan-making process.
- 3.2 An “effect” includes anything which would impact upon a protected site. Temporary, permanent, direct and indirect effects need to be considered. A plan or project does not need to be located on a site in order to impact on it. Generally, the closer an activity is, the greater the chance it will affect a site. However, operations taking place far from a protected site may still can have a significant effect (e.g. a project which extracts water may affect a site some distance away by altering the water table, and emissions to air or water may impact on sites distant to the source of the emission)².
- 3.3 A hierarchy of avoidance, mitigation and compensatory measures is promoted by the Directive. The approach to undertaking a HRA is a step by step process which contains the following stages:
- Stage 1: Likely significant effects (‘screening’);
 - Stage 2: Appropriate Assessment (the ‘integrity test’); and
 - Stage 3: Mitigation measures and alternative solutions

In exceptional circumstances, if following Stage 3, a plan cannot avoid an adverse effect (or risk of one) on a Protected site, there may be a further stage – referred to as the Imperative Reasons of Overriding Public Interest (IROPI) Test. More details on all these stages can be found in the following sections.

Stage 1: Likely significant effects (‘Screening’ stage)

- 3.4 The Screening stage, which this report represents, seeks to identify whether the Local Plan is likely to have a significant effect on a protected site and in doing so, determines whether subsequent stages of the HRA process are required to be undertaken.
- 3.5 In undertaking the Screening stage, the authority has to consider relevant available information in concluding whether a significant effect is likely to occur to a protected site. This includes giving consideration to other plans and strategies, which will allow the authority to assess whether the plan is likely to have a significant effect by itself or in combination with other plans that are in force or in production.
- 3.6 Throughout the process the precautionary principle is applied to the HRA. This means that where there is not enough information to assess whether a plan or project is likely or not to have a significant effect on a protected site, it should be assumed that a risk may exist. If this is the case, it would result in either Stage 1 being undertaken at a later stage when more details are known or the HRA proceeding to Stage 2: Appropriate Assessment.

² Source: DEFRA ‘The Habitats and Wild Birds Directives in England and its seas Core guidance for developers, regulators & land/marine managers December 2012 (draft for public consultation)

- 3.7 In April 2018, the European Court of Justice (ECJ) issued a decision in the case of [*People Over Wind, Peter Sweetman v Coillte Teoranta \(C-323/17\)*](#). The ruling confirmed that proposed mitigation measures cannot be taken into account for the purposes of screening under the UK Habitats Regulations, which give effect to the EU Habitats Directive (92/43/EEC).

Stage 2: Appropriate Assessment

- 3.8 If this stage is necessary, an Appropriate Assessment (AA) will be carried out to establish the potential effects of the plan on the protected site's integrity. In doing so, the AA will consider the site's qualifying features, its conservation objectives and the key environmental conditions which support the site's integrity.
- 3.9 Regulation 102 of the Amended Habitats Regulations 2010 requires an Appropriate Assessment to identify any potential in-combination effects; therefore, it is necessary to establish which other plans and strategies may affect the protected site(s) considered in this assessment.
- 3.10 If it is found that the plan will impact on the site's integrity, it is necessary to proceed to the third stage of the process to consider mitigation measures and alternative solutions to prevent negative impacts to the protected site(s) arising from the plan.

Stage 3: Mitigation measures and alternative solutions

- 3.11 If there is an adverse effect on the integrity of the protected site(s), these effects should be mitigated. The main aim of seeking mitigation is to fully cancel out any adverse effects the plan may have on a protected site. It is accepted that it is not always possible to completely eradicate the plan's negative impacts on a protected site. Therefore mitigation would need to ensure sufficient reduction so that an adverse impact on the integrity of the protected site(s) can be nullified. Measures will normally involve the modification of a plan or project.

When adverse effects (or risk of one) on a protected site cannot be avoided

- 3.12 In exceptional circumstances, an authority can implement a plan even when the HRA process concludes that there would be a negative impact on a protected site's integrity that could not be overcome by mitigation or by choosing alternative solutions. This is because Article 6(4) of the Habitats Directive allows an authority to implement a plan if there are imperative reasons of overriding public interest (more commonly written as its acronym, IROPI) for doing so. In such an instance, compensatory measures would have to be put in place to counteract some of the plan's negative impacts. These must be taken to ensure that the overall coherence of the network of International Habitats Sites is protected.

In-Combination Effects

- 3.13 Other plans and projects being prepared or implemented in the area may have the potential to cause negative effects on the integrity of European sites. These effects may be exacerbated when experienced in combination with the effects of the District Plan, possibly leading an insignificant effect to become significant. It is therefore important to consider

which other plans and projects could generate similar effects as development within Tandridge at the same European sites, and which may act in-combination. In combination effects are therefore considered throughout the Appropriate Assessment.

- 3.14 A decision-maker may not issue a development consent without undertaking an 'appropriate assessment' of a scheme's impact on the integrity of a protected site, unless he/she can 'exclude' the possibility of likely significant effects of the scheme alone or in combination with other plans or projects.
- 3.15 That a likely significant effect from a scheme (alone or in combination) cannot be screened out under this precautionary approach does not mean that under an 'appropriate assessment' it will necessarily be concluded that there will be adverse impacts on the integrity of the European site, it merely requires that a more detailed study be undertaken, on the best information currently available.
- 3.16 At the stage of considering the matter, those 'plans or projects' which need to be considered 'in combination' are those which amount to commitments, but not yet apparent in the baseline. Future or inchoate schemes need not be included as they, in turn, will need to go through the consenting process, taking into account the approval of the scheme in question as a commitment.

4. INFORMATION FOR STAGE 1: LIKELY SIGNIFICANT EFFECTS ('SCREENING')

4.1 As part of *Stage 1: Screening*, a range of information needs to be considered in order to complete a Screening Assessment for each protected site. This Screening Assessment considers key environment conditions and any possible effects the Neighbourhood Plan may have on these. This section presents information that has been considered.

The 'International Habitats Sites'

4.2 There are no protected sites within Tatsfield Parish, nor indeed within Tandridge District. The nearest internationally protected habitats sites are:

- Ashdown Forest SPA and SAC, which is 19 km away from the Parish boundary at its nearest point.
- Mole Gap to Reigate Escarpment SAC is 15.3km away from the Parish boundary at its nearest point.

4.3 Taking a precautionary approach, both Mole Gap to the Reigate Escarpment and the Ashdown Forest are considered relevant to subject to the HRA process for the Tatsfield Neighbourhood Plan.

4.4 Protected sites have different reasons for designation and accordingly they have different pressures. Information about both sites can be found in Table 2 below. In addition, the more detailed site citations published under the EU Directives are at Appendix 2.

4.5 There are two relevant 'Site Improvement Plans' (SIPs) as follows:

- [Ashdown Forest Site Improvement Plan](#)
- [Mole Gap to Reigate Escarpment Site Improvement Plan](#)

4.6 These SIPs were produced by Natural England who led a 2 year programme (finished in 2015) in partnership with the Environment Agency with support from the [European Union's LIFE+ Nature and Biodiversity programme](#). Essentially the SIPs set out plans on how to target efforts on the protected sites to get them into a healthy state. As such, they provide some insight into the existing challenges facing the protected sites.

4.7 For example, the Ashdown Forest SIP highlights threats that include air pollution – the impact of atmospheric nitrogen deposition and public access disturbance. For each threat, a set of actions is identified. It is notable that in relation to atmospheric nitrogen deposition, the

mechanism of a 'Site Nitrogen Action Plan'(SNAP) was identified, but the funding and delivery body not yet identified. The Mole Gap to Reigate Escarpment SIP also highlights the threats of atmospheric nitrogen deposition and public access disturbance.

- 4.8 Site of Special Scientific Interest (SSSI) Condition Analysis can be found in Appendix 3. SSSI monitoring is undertaken by Natural England as part of their statutory duties. The objectives of SSSI monitoring include informing agreement of the most appropriate site management and contributing to Natural England's monitoring of long-term changes in the natural environment. It is important to note that all Natura 2000 and Ramsar sites are also covered by the statutory national SSSI designation, therefore the condition analysis of SSSI may provide useful insights into the condition of internationally protected sites. However, the data should be treated with caution since the SSSI boundaries cover a slightly greater extent than the international sites, as demonstrated in Table 1, so will include condition assessments of areas not relevant to the HRA.

Table 1: Comparison of Protected Sites by Spatial Extent

	Subject to HRA		Not Subject to HRA
	SAC Area (Ha)	SPA Area (Ha)	SSSI Area (Ha)
Mole Gap to Reigate Escarpment	894.33	N/a	1,016.42
Ashdown Forest	2,728.31	3,205.46	3,213.09

- 4.9 The tables in Appendix 3 show that more than three-quarters of the Ashdown Forest SSSI is in unfavourable condition, though recovering. For the Mole Gap to Reigate Escarpment, there is a more even split, with just over half favourable and the remainder unfavourable (mostly recovering)

Table 2: Information about the Mole Gap to Reigate Escarpment SAC

Mole Gap to Reigate Escarpment SAC		Ashdown Forest (SAC and SPA)
Location	Mole Valley District /Reigate and Banstead Borough	Wealden District
Proximity to Tatsfield Parish	Around 15.3km at the nearest point, to the west.	Around 19km at the nearest point, to the south-east.
Extent	888 hectares. 15% Heath, Scrub, Maquis and Garrigue, Phygrana. 25% Dry grassland, Steppes. 60% Broad-leaved deciduous woodland.	2,729 hectares (SAC), 3,207 hectares (SPA) 60% Heath, Scrub, Maquis and Garrigue, Phygrana. 40% Mixed woodland.
Site Description³	<p>SAC Mole Gap in south-east England supports the only area of stable box scrub in the UK, on steep chalk slopes where the River Mole has cut into the North Downs Escarpment, creating the Mole Gap. Here, natural erosion maintains the open conditions required for the survival of this habitat type. The site therefore supports a stable formation and has good conservation of habitat structure and function.</p> <p>This site hosts the priority habitat type "orchid rich sites". This large but fragmented site on the North Downs escarpment supports a wide range of calcareous grassland types on steep slopes, including <i>Festuca ovina</i> – <i>Avenula pratensis</i>, <i>Bromus erectus</i>, <i>Brachypodium pinnatum</i>, <i>Brachypodium pinnatum</i> – <i>Bromus erectus</i> and <i>Avenula pubescens</i> grasslands. It exhibits a wide range of structural conditions ranging from short turf through to scrub margins, and is particularly important for rare vascular plants, including orchids. It is also significant in exhibiting transitions to scarce scrub, woodland and dry heath types, notably Stable xerothermophilous formations</p>	<p>SAC Ashdown Forest contains one of the largest single continuous blocks of lowland heath in south-east England, with both European dry heaths and, in a larger proportion, wet heath. The <i>Erica tetralix</i> – <i>Sphagnum compactum</i> wet heath element provides suitable conditions for several species of bog-mosses <i>Sphagnum</i> spp., bog asphodel <i>Narthecium ossifragum</i>, deergrass <i>Trichophorum cespitosum</i>, common cotton-grass <i>Eriophorum angustifolium</i>, marsh gentian <i>Gentiana pneumonanthe</i> and marsh clubmoss <i>Lycopodiella inundata</i>. The site supports important assemblages of beetles, dragonflies, damselflies and butterflies, including the nationally rare silver-studded blue <i>Plebejus argus</i>, and birds of European importance, such as European nightjar <i>Caprimulgus europaeus</i>, Dartford warbler <i>Sylvia undata</i> and Eurasian hobby <i>Falco subbuteo</i>.</p> <p>The dry heath in Ashdown Forest is an extensive example of the south-eastern <i>Calluna vulgaris</i> – <i>Ulex minor</i> community. This vegetation type is dominated by heather <i>Calluna vulgaris</i>, bell heather <i>Erica cinerea</i> and dwarf gorse <i>Ulex minor</i>, with transitions to other habitats. It supports</p>

³ As stated from information on the Joint Nature Conservation Council's website – www.jncc.defra.gov.uk

	<p>with <i>Buxus sempervirens</i> on rock slopes, yew <i>Taxus baccata</i> woods, and chalk heath.</p> <p>At Mole Gap to Reigate Escarpment, yew <i>Taxus baccata</i> woodland has been formed both by invasion of chalk grassland and from development within beech <i>Fagus sylvatica</i> woodland following destruction of the beech overstorey. Yew occurs here in extensive stands, with, in places, an understorey of box <i>Buxus sempervirens</i> at one of its few native locations.</p>	<p>important lichen assemblages, including species such as <i>Pycnothelia papillaria</i>. This site supports the most inland remaining population of hairy greenweed <i>Genista pilosa</i> in Britain.</p> <p>SPA This site qualifies under Article 4.1 of the Directive (79/409/EEC) by supporting populations of European importance of the following species listed on Annex I of the Directive:</p> <p>During the breeding season; Dartford Warbler <i>Sylvia undata</i>, 29 pairs representing at least 1.8% of the breeding population in Great Britain (Count as at 1994).</p> <p>Nightjar <i>Caprimulgus europaeus</i>, 35 pairs representing at least 1.0% of the breeding population in Great Britain (Two year mean, 1991 & 1992)</p>
<p>Qualifying Features⁴</p>	<p>European dry heaths.</p> <p>Stable xerothermophilous formations with <i>Buxus sempervirens</i> on rock slopes (<i>Berberidion p.p.</i>); Natural box scrub.</p> <p>Semi-natural dry grasslands and scrubland facies: on calcareous substrates (<i>Festuco-Brometalia</i>) (important orchid sites); Dry grasslands and scrublands on chalk or limestone (important orchid sites).</p> <p><i>Asperulo-Fagetum</i> beech forests; Beech forests on neutral to rich soils</p> <p><i>Taxus baccata</i> woods of the British Isles; Yew-dominated woodland</p> <p><i>Triturus cristatus</i>; Great crested newt</p> <p><i>Myotis bechsteinii</i>; Bechstein's bat.</p>	<p>SAC Northern Atlantic wet heaths with <i>Erica tetralix</i>; Wet heathland with cross-leaved heath.</p> <p>European dry heaths <i>Triturus cristatus</i>; Great crested newt.</p> <p>SPA Caprimulgus europaeus; European nightjar (Breeding). <i>Sylvia undata</i>; Dartford warbler (Breeding).</p>
<p>Key environmental conditions to support site</p>	<ul style="list-style-type: none"> · Minimal air pollution; · Maintenance of grazing; · Absence of direct fertilisation; · Suitable foraging and refuge habitat 	<ul style="list-style-type: none"> · Minimal air pollution; · Relatively unpolluted water (approx. neutral pH); · Low recreational disturbance; · Suitable foraging and refuge habitat

⁴ Taken from the Conservation Objectives for the respective sites

integrity	<p>within 500m of ponds;</p> <ul style="list-style-type: none"> · Maintenance of landscape features (hedgerows, woodland, mature trees, etc.) and roosts used by Bechstein's bats · Low recreational pressure; and · Maintenance of tree management. 	<p>within 500m of ponds;</p> <ul style="list-style-type: none"> · Balanced hydrological regime to maintain wet heath; · Grazing management to prevent succession. · Some ponds deep enough to retain water throughout February to August (at least once in three years); · Good connectivity of landscape features.
Vulnerability	<p>Most of this site is a mosaic of chalk downland habitats, ranging from open chalk grassland to scrub and broadleaved semi-natural woodland on the scarp slope of the North Downs. Headley Heath is an area of heathland, grassland and woodland located on clay-with-flints on the dip slope. Both box and yew are well represented.</p> <p>Recreational pressure is high and requires management and monitoring. The National Trust and Surrey County Council own and manage a significant proportion of the site. In addition smaller areas are owned by other local authorities and the local wildlife trust. Recreation and conservation requirements tend to be taken into consideration by such bodies. The rest of the site is in smaller private ownerships. For these areas, appropriate management has been addressed through the Site Management Statement process. These areas are most under threat from neglect and a lack of appropriate grazing.</p> <p>Bechstein's bats use the site throughout the year, as a winter hibernacula, autumn 'swarming' site, and as feeding habitat. English Nature is currently working with local bat surveyors to locate maternity roosts, and to gain a better understanding of the movements and requirements of bats on this site.⁵</p>	<p>SAC⁶</p> <p>Ashdown Forest is one of the most extensive areas of heathland in south-east England. The optimum management for this site is grazing; however, only approximately 19% of the SAC is grazed. Spread of scrub and bracken is a major threat to the SAC.</p> <p>The majority of the SAC (including the grazed area) is managed sympathetically by the Conservators of Ashdown Forest but there is high demand on resources for scrub clearance, bracken mowing, etc., particularly in the ungrazed area. There is ongoing liaison with the Conservators and other land owners/managers to increase the area of grazed heathland. Obstacles to grazing include public opposition to fencing, availability of graziers/suitable livestock, and constraints on dog-walkers. In general, public access is not a threat to the SAC, unless it prevents expansion of the grazed area.</p> <p>Also, possible long-term drying out of the site may take place, due to borehole extraction and transpiration from increase in vegetation cover. Consultations with the Environment Agency over the possible impact of extraction are ongoing. Recent increased scrub clearance is likely to have a beneficial effect on wet heath.</p>

⁵ Taken from the Mole Gap to Reigate Escarpment SAC Natura 2000 data form - <http://jncc.defra.gov.uk/protectedsites/sacselection/n2kforms/UK0012804.pdf>

⁶ Taken from the Ashdown Forest SAC Natura 2000 data form - <http://jncc.defra.gov.uk/protectedsites/sacselection/n2kforms/UK0030080.pdf>

SPA⁷

Lack of management is the main threat to the site. Succession from open heathland to woodland is rapidly taking place and a lack of resources makes appropriate and sustainable management difficult.

The majority of the site is managed by the Conservators of Ashdown Forest, who manage the site sympathetically and according to an agreed management plan. The key vulnerability is the lack of grazing which is now being addressed through a Grazing Strategy. Obstacles to grazing include the need for fencing, constraints on dog walkers and other forms of informal recreation, the availability of appropriate stock and the fragmentation of the heathland blocks within the site. The spread of invasive/non-native species, such as bracken and rhododendron, also poses a threat. The areas not under the Conservators remit tend not to be grazed and have varying degrees of conservation management.

Most of the recreation on the site is informal, such as walking and horse riding. However, in places the use is intense resulting in damage to rights of way and disturbance to the Forest. Where possible these problems are being addressed through the Integrated Management Plan of the Conservators of Ashdown Forest and through a horse riding permit system.

⁷ Taken from the Ashdown Forest SPA Natura 2000 data form - <http://jncc.defra.gov.uk/pdf/SPA/UK9012181.pdf>

Other relevant plans and strategies

- 4.10 When undertaking the HRA, it is necessary to look at relevant plans produced by other authorities to understand whether the Local Plan, in combination with other plans and strategies, could have a significant effect on a protected site.
- 4.11 A summary of the main matters of contextual relevance from other plans are found in Table 3 below, based on a judgement of likely significance. For the Ashdown Forest this includes all local planning authorities currently cooperating as part of the Ashdown Forest Air Quality Group.

Table 3: A summary of relevant issues covered in other authorities' Plans

Local Authority	Local Plan(s)	Main Matters of Relevance
Brighton & Hove	<p>City Plan Part One (adopted 2016).</p> <p>The City Plan Part Two Scoping document (development management policies and allocations) went on consultation for a 10 week period of consultation from 5th July to 13th September 2018</p> <p>The Local Plan for Bromley adopted on 16 January 2019.</p>	<p>Identifies 13,200 new homes to be built over the plan period 2010 – 2030.</p> <p>No policies specifically relate to Ashdown Forest SPA/SAC or Mole Gap to Reigate Escarpment SAC. However, the biodiversity policy acknowledges the importance of international designated sites.</p>
Bromley	<p>The Local Plan for Bromley adopted on 16 January 2019.</p>	<p>Identifies 6,413 homes to be delivered between 2015 and 2025.</p> <p>Identifies a minimum average of 641 homes per annum over a 10 year period and where possible over a 15 year plan period.</p>
Crawley	<p>Submission Draft Local Plan (Reg 19) January 2020</p> <p>Crawley 2030: Crawley Borough Local Plan 2015 -2030 (adopted December 2015)</p>	<p>Crawley 2030 identifies a minimum 5,100 new homes between 2015 – 2030. Equates to at least 340 p/a but phased according to trajectory. Between 23ha and 35ha of new employment land.</p> <p>HRA: No significant impacts identified on European sites, including the Ashdown Forest SAC/SPA alone or in combination with other plans or projects.</p>
Croydon	<p>Croydon Local Plan(Adopted February 2018)</p>	<p>A minimum of 32,890 homes between 2016 and 2036.</p> <p>An HRA Stage 1 Screening was carried out in 2015. For the Mole Gap to Reigate Escarpment SAC, the HRA considered that there were no realistic pathways present.</p>
Eastbourne	<p>New Eastbourne Local Plan Issues & Options Consultation November 2019</p> <p>Core Strategy Local Plan (2013)</p>	<p>Core Strategy 5,022 dwellings by 2027 (240 pa) OAN: 520 dpa.</p>
East Sussex	<p>Local Transport Plan (LTP) 2011-2026</p>	<p>HRA (2011) concluded that further amendments to wording in the LTP required before</p>

Local Authority	Local Plan(s)	Main Matters of Relevance
County Council	Waste and Minerals Sites Plan 2017	<p>we are able to conclude that significant effects are unlikely. Once these amendments have been made, the LTP will be reassessed and this conclusion can be amended.</p> <p>The WMSP was subject to Habitats Regulation Assessment (HRA) screening, both in terms of the proposed waste sites and policies within the Plan. Details of the HRA screening were included in the site profiles of the plan. Several sites identified as needing project level HRA screening should they come forward for development.</p>
Elmbridge	<p>Core Strategy (Adopted 2011)</p> <p>Development Management Plan Adopted 2015</p> <p>New Local Plan underwent Strategic Options Consultation that ended in 2020.</p>	<p>The Core Strategy plans for approximately 3,375 net additional dwellings (225 net dwellings annual average) within the Borough between 2011 and 2026.</p> <p>OAN: 9,480 (2015-2035) 474 p/a. (Source: SHMA 2016)</p> <p>An HRA of 'Settlement Investment and Development Plans' was undertaken in March 2013. It noted that Mole Gap to Reigate Escarpment was 4km from the Borough boundary, but concluded that there were no additional impacts to that identified in the Appropriate Assessment from the Core Strategy and there were no likelihood in-combination effects.</p> <p>A Habitats Regulations Assessment Stage 1: Initial Screening Report for the 'Spatial Strategy Options' was undertaken in November 2016. This was inconclusive regarding LSE and indicated the need to update the report at later stages to enable a more detailed assessment of likely impacts to be undertaken before deciding if adverse effects remain and need to proceed to Stage 2: Appropriate Assessment.</p>
Epsom and Ewell	<p>Local Plan 2017-2037 being prepared.</p> <p>Core Strategy (Adopted 2007)</p> <p>Submission draft Development Management Plan 2018</p>	<p>Provides for 181 homes per annum or 3,620 dwellings between 2006 and 2026. HRA concluded that Core Strategy would not have an impact on Natura 2000 sites due to separation distances from the borough, growth locations, and mitigation/avoidance measures included in the plan.</p> <p>Submission Draft Development Management Plan 2018 requirement of 7,106 new</p>

Local Authority	Local Plan(s)	Main Matters of Relevance
		<p>homes up to 2032 - *418 new homes each year from 2015 to 2032. Site locations not yet confirmed.</p> <p>OAN: 8,352 (2015-2035) 418 p/a (Source: SHMA June 2016)</p>
Greater London Authority	The London Plan 2016	<p>The Plan establishes a minimum 10 year housing target 2015-2025 across all London Boroughs of 423,887. This includes the following:</p> <p>Bromley: 6,413 Croydon: 14,348 Kingston-upon-Thames: 7,330 Merton: 4,107 Richmond-upon-Thames: 3,150 Sutton: 3,626</p> <p>The Plan's Key Diagram identifies the broad Wandle Valley- a planning and investment corridor of city region importance connecting from Wandsworth through Croydon and down to Gatwick Airport and Crawley. Although the boundary of the Wandle Valley is non-specific, logically this would connect down the M23 through Tandridge District.</p> <p>A draft new London Plan was published for consultation in December 2017 to March 2018. It has the following 10 year housing targets to 2029:</p> <p>Bromley: 14,240 (1,424 p/a) Croydon: 29,490 (2,949 p/a) Kingston-upon-Thames: 13,640 (1,364 p/a) Merton: 13,280 (1,328 p/a) Richmond-upon-Thames: 8,110 (811p/a) Sutton: 9,390 (939p/a)</p> <p>A Draft HRA (November 2017) was included alongside the consultation. It noted the</p>

Local Authority	Local Plan(s)	Main Matters of Relevance
		<p>Mole Gap to Reigate Escarpment SAC is just over 5km from Greater London at its closest.</p> <p>The HRA concluded that ‘Since it is not a conveniently situated site for casual recreational visits for most Londoners, and London (particularly the boroughs closest to the SAC) has a large amount of its own high quality recreational natural greenspace, recreational pressure from the new London Plan is unlikely to arise either alone or in combination.’</p> <p>Regarding air quality, the HRA concluded that The draft London Plan contains fourteen policies that either make reference to improving air quality in London (other than greenhouse gases which are not directly relevant to impacts on European sites), or which will improve air quality via their delivery, demonstrating a strong commitment to improve air quality within the Greater London Authority boundary. Whilst it is noted that the aim is in general to improve air quality from a public health perspective, any improvement in air quality will have a positive knock-on-effect to European designated sites that are sensitive to atmospheric pollution.</p>
Guildford	Local Plan 2015-2034 adopted April 2019 (policies and site allocations)	<p>562 dwellings per annum 2015 to 2034 totalling at least 10,678 new homes.</p> <p>Provision has been made for at least 36,100 – 43,700 sq. m of office and research and development (B1a and b) floorspace (net); 3.7– 4.1 hectares of industrial (B1c, B2 and B8) land (gross); and approximately 41,000 sq. m of comparison retail floorspace (gross).</p> <p>An HRA (2016) was published to support the Proposed Submission Local Plan: strategy and sites (2016). This has been updated to take account of changes in the Proposed Submission Local Plan: strategy and sites (2017). It focused upon issues related to the Thames Basin Heaths SPA and does not refer to the Mole Gap to Reigate Escarpment SAC or other international sites.</p>
Horsham	Draft Local Plan 2019-2036 Reg 18 consultation ended March 2020.	The Horsham District Planning Framework (HDPF), with the exception of land within South Downs National Park, replaces policies contained in the Horsham District Core

Local Authority	Local Plan(s)	Main Matters of Relevance
	<p>Horsham District Planning Framework (Adopted November 2015)</p> <p>Local Plan Review at Issues & Options stage.</p>	<p>Strategy and General Development Control Policies adopted in 2007.</p> <p>The HDPF proposes 16,000 new homes over the plan period 2011 – 2013. It includes a general policy protecting nature conservation designated sites.</p> <p>The HRA concluded that, taking into account proposed avoidance and mitigation measures the plan will not have an adverse effect on site integrity of any European site, alone or in combination with other plans or projects.</p>
Kingston-upon-Thames	<p>New Local Plan early engagement consultation ended July 2019.</p> <p>Kingston Core Strategy (adopted 2012).</p> <p>New Local Plan being prepared and undertaking a call for sites</p>	<p>Adopted in April 2012 Provision of 5625 homes between 2012 and 2027. 50000 sq.m of retail floorspace. Will be replaced by the Kingston Local Plan 2019 – 2041.</p> <p>Draft London Plan Consultation 1 December 2017 – 2 March 2018</p> <p>Kingston 2019/20 – 2028/29 = 13,640. Per annum = 1,364</p> <p>Core Strategy - Potential for impact on Natura 2000 sites from recreational pressures and air pollution, however taking into account the location of most growth and measures to reduce air pollution the Plan is unlikely - either alone or in combination - to have a significant impact on these sites</p>
Lewes	<p>Core Strategy (Adopted 2016)</p> <p>Local Plan Part 2 (Adopted 2020)</p>	<p>The Core Strategy identifies 6,900 homes between 2010 and 2030, mostly distributed away from northern rural area nearest to Ashdown Forest.</p> <p>Local Plan Part 2 identifies 6926 dwellings.</p>
Merton	<p>Local Plan 2020 pre-submission expected in Spring 2021.</p> <p>Core Planning Strategy (adopted 2011)</p> <p>Sites and Policies Plan (adopted 2014)</p>	<p>Emerging Local Plan 2020 proposes 6,165 additional homes for the period 2020 – 2035;</p> <p>Core Strategy stipulates provision of a minimum of 4,800 additional homes for the period 2011 – 2026.</p> <p>No policies specifically relate Mole Gap to Reigate Escarpment SAC or to international</p>

Local Authority	Local Plan(s)	Main Matters of Relevance
		<p>designated sites. The Merton Sites and Policies Plan HRA states that the Mole Gap to Reigate Escarpment is too distant to be considered relevant to the Plan.</p> <p>The Core Strategy had an HRA screening in 2010 which concluded that none of the policies in the Core Strategy are likely to result in significant adverse impacts on European Sites.</p>
Mid Sussex	Mid Sussex District Plan 2014-2031 adopted March 2018	<p>The District Plan sets a minimum housing provision figure of 16,390 homes in the 17-year period 2014 – 2031.</p> <p>An average of 876 new homes per year until 2023/24. An average of 1,090 new home per year between 2024/5 and 2030/31 subject to no further harm to the integrity of the Ashdown Forest. 23 additional traveller pitches. 25ha business park</p> <p>The HRA concluded ‘No adverse impact on Mole Gap to Reigate Escarpment SAC.</p> <p>Adverse effects resulting from atmospheric pollution are not considered likely for the Ashdown Forest SAC. Disturbance impacts are assessed as potentially affecting the Ashdown Forest SPA, however, they are considered to be adequately avoided and mitigated by the District Plan via the implementation of SANG.’</p>
Mole Valley	Core Strategy 2009 (2006-2026) Future Mole Valley (Local Plan 2018-2033) initial consultation closed March 2020	<p>Core Strategy Stipulates 3,760 homes, 6-7 additional traveller pitches, 2800sqm of new convenience retail floorspace to be delivered in the plan period 2006 and 2026. OAN: 7,814 (2015-2035) 391 p/a (Source: SHMA June 2016).</p> <p>The Plan Introduced policy (CS15) to protect Mole Gap to Reigate Escarpment SAC and seeks to prevent development within 800m of the site, unless the effect of development can be mitigated.</p> <p>An HRA was undertaken in 2008. It concluded that, with measures put in place as part</p>

Local Authority	Local Plan(s)	Main Matters of Relevance
Reigate and Banstead	Core Strategy (2012-2027) adopted in 2014. Development Management Plan adopted September 2019.	<p>of the preparation and adoption of the Core Strategy, the Plan, in-combination with others, would not have a significant in combination impact on the Natura 2000 Sites.</p> <p>The Core Strategy identified 6,900 homes to be delivered (460 homes per year). It introduced a policy to assist in the protection of the Mole Gap to Reigate Escarpment SAC.</p> <p>Most of housing is to be delivered in existing urban areas, with some to be delivered on urban extensions away from close proximity to Mole Gap to Reigate Escarpment SAC.</p> <p>An HRA Summary was published in March 2014.</p> <p>Supporting HRA was prepared for the submission stage (May 2012); an update was then published alongside the Core Strategy Further Amendments (Dec 2012). It considered both the Mole Gap to Reigate Escarpment and the Ashdown Forest but concluded that the Core Strategy, alone and in combination with other plans and projects, would have no adverse impact on the integrity of Natura 2000 sites.</p>
Rother	Core Strategy 2011 – 2028 (adopted September 2014) Part 2: 'Development and Site Allocations Plan' (adopted December 2019)	<p>Identifies 5,700 new dwellings over the plan period 2011 – 2028.</p> <p>The accompanying HRA screened out the Ashdown Forest SAC due to the distance from the boundary of the District and distance from settlements identified as suitable for development within the Plan.</p>
Sevenoaks	Local Plan underwent Examination. Inspector requests it is withdrawn. Core Strategy (2006-2026) Allocations and Development Management Plan (A&DMP) (Adopted)	<p>Proposes 10,568 new homes over the period 2015 to 2035.</p> <p>The Core Strategy identifies 3,300 homes to be delivered throughout the plan period. The A&DMP indicates 4,732 likely to be delivered during the plan period.</p> <p>Their current objectively assessed needs (OAN) is 12,400 new homes.</p>

Local Authority	Local Plan(s)	Main Matters of Relevance
	Feb 2015)	<p>Sevenoaks are in the process of preparing a new Local Plan from 2015 to 2035. They consulted on their Regulation 18 in August/September 2017 and are preparing to consult on another Regulation 18 in July/August 2018.</p> <p>An HRA of the Sevenoaks District Local Plan 2015-2035 Issues and Options Consultation was published in August 2017. It considers the impacts of various Local Plan growth options. For the Ashdown Forest, it suggests a 7-9km zone for recreational pressure. For air quality it suggests that due to the distances involved and the relatively small number of journeys to work from Sevenoaks south to Ashdown Forest, even a large quantum of new growth in the District may not have much effect on daily traffic flows through the SPA/SAC, but recommends further modelling and analysis of the anticipated Local Plan air quality impact is undertaken in combination with neighbouring authorities.</p>
South Downs National Park Authority	South Downs Local Plan (Adopted July 2019)	<p>Total Housing 4,977 (2014 – 2033)</p> <p>HRA 2018: On Ashdown Forest SAC/SPA cited Ashdown Forest working group as a safeguard, noting <i>'The shared objective of the working group is to ensure that impacts on the Ashdown Forest are properly assessed through HRA and that, if required, a joint action plan is put in place should such a need arise. It should be noted that the absence of any need for 'mitigation' associated with future growth in a particular authority does not prevent the various Ashdown Forest authorities cooperatively working together to do whatever they jointly consider appropriate in reducing traffic and improving nitrogen deposition etc. around the Forest as a matter of general good stewardship. This would also enable future trends in air quality to be tracked and the modelling (and responses to that modelling) to be updated as necessary. The aforementioned working group would be a suitable forum for this cooperative working.'</i></p>
Surrey County Council	Surrey Waste Plan 2018 Draft plan consultation (Regulation 18) November 2017 to February 2018.	<p>Identifies Strategic Waste Site Allocation in the District – Land at Lambs Business Park, Terra Cotta Road, South Godstone (considered in Air Quality Impact Assessments for Mole Gap to Reigate Escarpment and Ashdown Forest)</p> <p>SCC HRA: Possible effects identified on Natura 2000 sites from thermal processing</p>

Local Authority	Local Plan(s)	Main Matters of Relevance
		emissions, traffic emissions, dust, land take, water discharge, pest and predators and litter. Concludes that proposed developments were unlikely to result in harmful impact and that the Plan would not have any alone or in-combination effects on European sites.
	Surrey Minerals Plan 2009-2026	No adverse impact on the Mole Gap to Reigate Escarpment identified.
	Surrey Aggregates Recycling Joint DPD 2013	The Plan would not give rise to any significant effects on the condition and integrity of Natura 2000 sites
	Local Transport Plan 3	Objective of securing reliable transport network and promoting sustainable transport options. The Plan would not give rise to any significant effects on the condition and integrity of Natura 2000 sites
Sutton	Local Plan Adopted 2018	The target is to deliver at least 6,405 new homes over the plan period 2016-2031 (427 new homes per year). At least 10 ha for industrial uses, 23,000sqm office floorspace, 36,000 retail floorspace and 10,000sq gross for leisure uses. No policies specifically relate to the Mole Gap to Reigate Escarpment SAC or to international designated sites. No likely significant effects on European sites identified. NE agreed no impact upon the designated sites as there isn't a direct impact pathway due to the distances involved.
Tunbridge Wells	Core Strategy 2010 Site Allocations Local Plan (adopted July 2016) Producing a new Local Plan up to 2033 to replace existing Local Plan 2006, Core Strategy and Development Plan Documents. Consultation took place on 'Issues and Options' for the new Local	New emerging Local Plan identifies 7,593 new dwellings 2016 to 2036. Adopted Core Strategy figure is 300 pa. The latest OAN is for 648 dwellings per annum, or 12,960 over 20 years (2013 – 2033).

Local Authority	Local Plan(s)	Main Matters of Relevance
Waverley	<p>Plan in 2017 and on a Draft Local Plan in Autumn 2019.</p> <p>Local Plan (Adopted Feb 2018)</p>	<p>Provision of 11,210 new homes between 2013 and 2032. Traveller target tbc. At least 16,000sqm of office/R&D space.</p> <p>A Part 1 HRA was published in 2016 which noted that the Mole Gap to Reigate Escarpment SAC lies approximately 11km from Waverley Borough at its closest point, which is the popular tourist spot of Box Hill, north of Dorking. It commented that the SAC is relatively easy to access from settlements including Godalming and Cranleigh and that the SAC lies within the typical distance over which visitors will travel to reach a countryside site for a day visit. As the SAC is sensitive to recreational pressure, the issue was screened in within supporting text. However the overall conclusion that the Waverley Borough Local Plan Part 1 (Strategic Policies and Sites) will have no adverse effect on the integrity of any European sites, within or beyond the borough boundary, either alone or in combination with other plans and projects. For air quality, the HRA noted that Policy MT1 (Sustainable Transport) would mitigate by minimising atmospheric pollution and improve air quality, and concluded that there will be no residual likely significant effects on the Mole Gap to Reigate Escarpment SAC.</p>
Wealden	<p>Core Strategy (2006-2027)</p> <p>New Local Plan 2013-2028 withdrawn in February 2020 following examination.</p>	<p>Withdrawn Local Plan proposed 14,228 homes and 22.5ha of employment space 2013 to 2028.</p> <p>The Plan contains policies that seek to ensure the protection of the Ashdown Forest SPA and SAC, and is supported by HRA.</p>
Woking	<p>Core Strategy October 2012.</p> <p>Site Allocations DPD Submitted July 2019</p> <p>Development Management Policies DPD</p>	<p>4,964 (292p/a) dwellings between 2010 and 2027.</p> <p>OAN: 517 p/a to 2033 (Source: 2015 SHMA)</p> <p>HRA (Dec 2016): Woking Site Allocations DPD not been fully screened out as having no likelihood of leading to significant adverse effects on European sites, for the following</p>

Local Authority	Local Plan(s)	Main Matters of Relevance
		reason: Recreational Pressure on Thames Basin Heaths SPA.

5. SCREENING THE INTERNATIONAL HABITATS SITES

- 5.1 Taking account of the information available to the Council (see Section 4 of this report), a Screening Assessment on the 'likely significant effect' that the Neighbourhood Plan would have on the relevant International Habitats Sites has been undertaken in below.

5.1 Mole Gap to Reigate Escarpment Recreational Disturbance

- 5.1.1 Recreational impacts upon the Mole Gap to Reigate escarpment have to be considered because recreational disturbance can have a negative impact on the chalk grassland, with dog walking and related nutrient enrichment of grassland impacting on the integrity of the site.
- 5.1.2 The boundary of the Tatsfield Neighbourhood Plan area is 15.3km at its nearest point. Furthermore, the SAC is elongated and tapers off to narrow point at its eastern extent, which is the nearest point in question. The honey pot destinations are further west in the SAC and much further from the Plan boundary.
- 5.1.3 Reference can be made to the HRA process conducted for the Tandridge District Local Plan, in particular the Appropriate Assessment Report submitted in January 2019. This drew on external evidence to show that recreational pressure at the Mole Gap to Reigate Escarpment SAC is focused mainly around 'honey pot' sites, particularly Box Hill, with the majority of impact being within a small radius of the car parks. It demonstrated that the SAC has a widely dispersed catchment. For the two most popular sites (Box Hill and Reigate Hill/Gatton park), the 75th percentile of visitors fall s in the 50-75 mile range, covering all of London and much of the South-East. Given the extremely large and populated catchment area, which includes all of Greater London (population 8.8 million) as well as much of the South-East, residents of the Tatsfield Neighbourhood Plan area will comprise a very insignificant proportion of overall visitor numbers. This is further supported by past Visitor Surveys showing that the main sources were Leatherhead and South London including Sutton, Carshalton and Croydon.'
- 5.1.4 Therefore, likely significant effects from recreational pressure on the Mole Gap to Reigate Escarpment stemming from the Tatsfield Neighbourhood Plan can be screened out.

5.2 Mole Gap to Reigate Escarpment Air Pollution

- 5.2.1 This needs to be considered since additional development risks causing increase in traffic movements on roads passing through or close to the protected site, thereby risking increasing air pollution and nitrogen disposition within the site.
- 5.2.2 Background evidence in support of the District Local Plan ([Aecom 'Air Quality Impact Assessment upon the Mole Gap to Reigate Escarpment'](#)) demonstrated there is no likely significant effects from air pollution, even from the full extent of District wide development allocated in the Local plan to 2033.

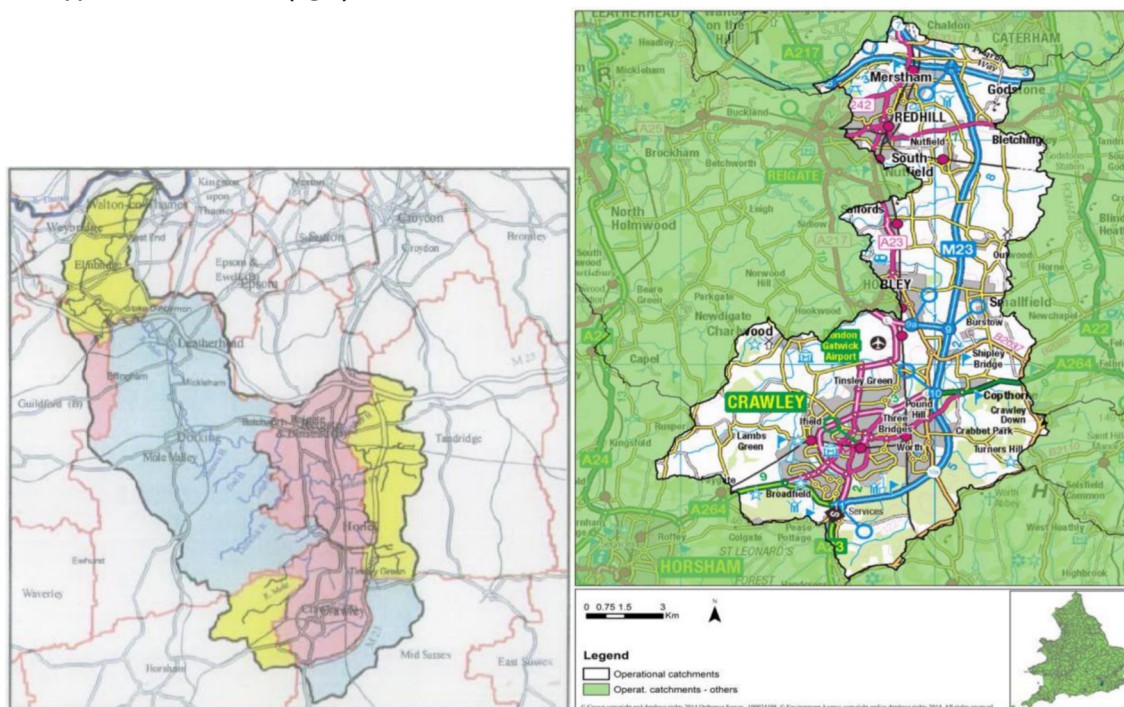
5.2.3 Therefore it can be concluded that there are no likely significant effect from the Neighbourhood Plan upon the Mole Gap to Reigate escarpment as a result of air pollution.

5.3 Mole Gap to Reigate Escarpment Drainage and Water Pollution

5.3.1 There is no likely significant effect from drainage and water pollution upon the Mole Gap to Reigate Escarpment as a result of the Tatsfield Neighbourhood Plan.

5.3.2 No impact pathways exist since the areas of the CR# Neighbourhood Plan does not impact upon the catchment of the River Mole which flows through the Mole Gap to Reigate Escarpment SAC.

Maps x and x River Mole Catchment (left)
and Upper Mole Catchment (right)



5.4 Ashdown Forest Recreational Disturbance

5.4.1 Recreational impacts upon the Ashdown Forest have to be considered because disturbance (particularly from dog walkers) could be having a significant effect on the breeding success of the protected ground nesting birds at the site

5.4.2 Visitor data collated to support the District Local Plan ([Ashdown Forest Visitor Surveys 2016 and 2009](#)) demonstrates that most visitors come from areas local to the Forest (within 7km). This conclusion was supported in the [District Local Plan Habitats Regulations Assessment](#),

and is an agreed position within the Ashdown Forest Recreation 'Statement of Common Ground' that is being drawn up by Tandridge district Council in partnership with Wealden District Council, Lewes District Council, Tunbridge Wells District Council and Sevenoaks District Council.

- 5.4.3 Therefore, the emerging Tandridge Local Plan (Policy TLP36) does not require development beyond 7km to automatically mitigate its impact. However Policy TLP36 also states '*For sites beyond the 7km zone of influence, the Council will take a precautionary approach where an Appropriate Assessment may be required under the Habitats Regulations Assessment to determine whether there will be a likely impact on the integrity of the Special Protection Area.*'
- 5.4.4 It is assumed that development allocations in the Neighbourhood Plan will be focused on sustainable locations in and adjacent to Tatsfield village, which is actually 19km from the Ashdown Forest at its nearest point. It is also assumed that the allocations will be of a scale that is broadly comparable to the levels of development anticipated by the Tandridge Local Plan. On the basis of these assumptions it is considered that there are no likely significant effect from recreational impacts upon the Ashdown Forest as a result of the Tatsfield Neighbourhood Plan. However, the District Council reserves the right to review the need for Appropriate Assessment as the Neighbourhood Plan's exact intentions regarding type, scale and location of development becomes clearer.

5.5 Ashdown Forest Air Quality

- 5.5.1 This needs to be considered since additional development risks causing increase in traffic movements on roads passing through or close to the protected site, thereby risking increasing air pollution and nitrogen deposition within the site.
- 5.5.2 background evidence in support of the District Local Plan ([Aecom 'Air Quality Impact Assessment upon the Ashdown Forest'](#)) demonstrated that there is no likely significant effects from air pollution even from the full extent of District wide development allocated in the Local plan to 2033.
- 5.5.3 Therefore there are not considered to be any likely significant effect from the Neighbourhood Plan upon the Ashdown Forest as a result of air pollution, based on current accepted evidence.
- 5.5.4 However, the District Council reserves the right to review the need for Appropriate Assessment in light of any emerging technical evidence and also as the Neighbourhood Plan's exact intentions regarding type, scale and location of development becomes clearer.

5.6 Consultation

5.6.1 As required by regulations, the views of Natural England have been sought on this screening opinions, although the Council did not receive a response.

6. CONCLUSIONS

6.1 This report has considered the impact that the Tatsfield Neighbourhood Plan could have on the Ashdown Forest SAC/SPA and the Mole Gap to Reigate Escarpment SAC as part of *Stage 1: Screening* of the Habitat Regulations Assessment (HRA). In doing so it has taken into consideration the nature of the sites and the reasons for their respective designations, whilst also having regard to the precautionary principle and the in-combination effect with other plans.

6.2 At this stage, based on the precautionary principle, it can be determined that the Neighbourhood Plan would **not have any likely significant effects** on the International Habitats Sites, in combination with other plans and programmes. The factors which can be screened out are:

Ashdown Forest SAC and SPA

- Risk of increase air pollution at the Ashdown Forest.
- Risk of increase in recreational disturbance at the Ashdown Forest SPA, affecting the ground nesting birds.

Mole Gap to Reigate Escarpment SAC

- Risk of increase in air pollution ;
- Risk of increase in recreational disturbance, affecting the chalk grassland; and
- Risk of increase in water pollution

6.3 As such, at this stage and based on current assumptions regarding development levels and location, it is **not** necessary to proceed to the next stage of the HRA process, *Stage 2: Appropriate Assessment*.

6.4 However, the District Council reserves the right to review the need for Appropriate Assessment as the Neighbourhood Plan's exact intentions regarding type, scale and location of development becomes clearer; and also in light of any emerging technical evidence.

Appendix 1 – Site Citations

Appendix 1a – Citation for Ashdown Forest SAC

EC Directive 92/43 on the Conservation of Natural Habitats and of Wild Fauna and Flora

Citation for Special Area of Conservation (SAC)

Name:	Ashdown Forest
Unitary Authority/County:	East Sussex
SAC status:	Designated on 1 April 2005
Grid reference:	TQ451306
SAC EU code:	UK0030080
Area (ha):	2729.00
Component SSSI:	Ashdown Forest SSSI

Site description:

Ashdown Forest contains one of the largest single continuous blocks of lowland heath in south-east England, with both dry heaths and, in a larger proportion, wet heath. The wet heath element provides suitable conditions for several species of bog-mosses *Sphagnum* spp., bog asphodel *Narthecium ossifragum*, deergrass *Trichophorum cespitosum*, common cotton-grass *Eriophorum angustifolium*, marsh gentian *Gentiana pneumonanthe* and marsh clubmoss *Lycopodiella inundata*. The site supports important assemblages of beetles, dragonflies, damselflies and butterflies, including the nationally rare silver-studded blue *Plebejus argus*.

The dry heath in Ashdown Forest is dominated by heather *Calluna vulgaris*, bell heather *Erica cinerea* and dwarf gorse *Ulex minor*, with transitions to other habitats. It supports important lichen assemblages, including species such as *Pycnothelia papillaria*. This site supports the most inland remaining population of hairy greenweed *Genista pilosa* in Britain.

The damming of streams, digging for marl, and quarrying have produced several large ponds in a number of areas of the forest. Although often largely free of aquatic vegetation there may be localised rafts of broadleaved pondweed *Potamogeton natans*, beds of reedmace *Typha latifolia* and water horsetail *Equisetum fluviatile*. These species are particularly abundant in the marl pits. Some of the ponds have large amphibian populations, including the great-crested newt *Triturus cristatus*.

Qualifying habitats: The site is designated under article 4(4) of the Directive (92/43/EEC) as it hosts the following habitats listed in Annex I:

- European dry heaths
- Northern Atlantic wet heaths with *Erica tetralix*. (Wet heathland with cross-leaved heath)

Qualifying species: The site is designated under article 4(4) of the Directive (92/43/EEC) as it hosts the following species listed in Annex II:

- Great crested newt *Triturus cristatus*

This citation relates to a site entered in the Register of European Sites for Great Britain.

Register reference number: UK0030080

Date of registration: 14 June 2005

Signed: *Trev Salmon*

On behalf of the Secretary of State for Environment, Food and Rural Affairs



Appendix 1b – Citation for Ashdown Forest SPA

EU Directive 79/409 on the Conservation of Wild Birds: Special Protection Area

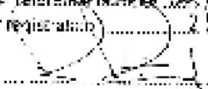
ASHDOWN FOREST (EAST SUSSEX)

The Ashdown Forest proposed Special Protection Area (pSPA) is an extensive area of common land on mainly sandy soils between East Grinstead and Crowborough in East Sussex. It comprises a mosaic of wet and dry heath, valley bog and woodland, and supports several uncommon plants, a rich invertebrate fauna and nationally important numbers of breeding nightjar and Dartford warbler. The boundary of the pSPA is coincident with that of the Ashdown Forest Site of Special Scientific Interest.

The site qualifies for designation under Article 4.1 of the EU Birds Directive by regularly supporting nationally important breeding populations of two Annex 1 species. The site supports 35 pairs of nightjar *Caprimulgus europaeus* (1991-92 survey), representing 1.1% of the British population, and 20 pairs of Dartford warbler *Sylvia undata* (1994 survey), representing 2.1% of the British population. Other regularly occurring Annex 1 species include woodcock *Lullula arborea*, hen harrier *Circus cyaneus* and great grey shrike *Lanius excubitor*.

The diverse range of heathland and woodland habitats on the site supports an important assemblage of breeding species, some of which have declined in England over recent years. Notable species regularly breeding on the site include hobby *Falco subbuteo*, tree pipit *Anthus trivialis*, redstart *Phoenicurus phoenicurus*, stonechat *Saxicola torquata* and wood warbler *Phylloscopus sibilatrix*, in addition to nightjar and Dartford warbler.

SPA Citation
ICC
May 1994

This citation map refers to a site and is on
the Register of European sites for Great Britain
Register reference number UK002181
Date of registration 25 July 1993
Signed 
on behalf of the Secretary of State for the Environment

Appendix 1c – Citation for Mole Gap to Reigate Escarpment SAC

EC Directive 92/43 on the Conservation of Natural Habitats and of Wild Fauna and Flora

Citation for Special Area of Conservation (SAC)

Name:	Mole Gap to Reigate Escarpment
Unitary Authority/County:	Surrey
SAC status:	Designated on 1 April 2005
Grid reference:	TQ199533
SAC EU code:	UK0012804
Area (ha):	887.68
Component SSSI:	Mole Gap to Reigate Escarpment SSSI

Site description:

Woodland, chalk grassland, chalk scrub and heathland form an interrelated mosaic at this site on the North Downs.

On the generally acidic plateau deposits of the crest of the Downs, the woodland is dominated by beech *Fagus sylvatica*, pedunculate oak *Quercus robur*, ash *Fraxinus excelsior* and yew *Taxus baccata*. On the lime-rich chalk slopes, the dominant trees are beech, ash and yew, together with field maple *Acer campestre* and common whitebeam *Sorbus aria* agg. and occasional large-leaved lime *Tilia platyphyllos*. Yew woodland has been formed both by invasion of chalk grassland and from development within beech woodland following destruction of the beech over-storey. Yew occurs in extensive stands, with, in places, an understorey of box *Buxus sempervirens*. This site supports the only area of stable box scrub in the UK, on steep chalk slopes where the River Mole has cut into the North Downs Escarpment, creating the Mole Gap. Here natural erosion maintains the open conditions required for the survival of this habitat type.

The site supports a range of species-rich chalk grassland types on steep slopes, dominated by red fescue *Festuca rubra*, sheep's-fescue *F. ovina*, quaking-grass *Briza media* and, in taller areas, upright brome *Bromopsis erecta*, tor-grass *Brachypodium pinnatum* and slender false-brome grass *Brachypodium sylvaticum*. Typical herbs include salad burnet *Sanguisorba minor*, yellow-wort *Blackstonia perfoliata* and field scabious *Knautia arvensis*. The site supports important populations of the nationally scarce musk orchid *Herminium monorchis* and man orchid *Aceras anthropophorum*, the former occurring in areas of shorter turf. A range of more widespread but local orchids are also present, including autumn lady's-tresses *Spiranthes spiralis* and green-winged orchid *Orchis morio*, as well as commoner species, such as pyramidal orchid *Anacamptis pyramidalis*, fragrant orchid *Gymnadenia conopsea* and bee orchid *Ophrys apifera*.

The acidic plateau deposits on Headley Heath support acidic heathland, dominated by heather *Calluna vulgaris*, bell heather *Erica cinerea* and dwarf gorse *Ulex minor*, often mixed with grasses such as wavy hair-grass *Deschampsia flexuosa* and common bent *Agrostis capillaris*. Chalk heath occurs on a small area of Headley Heath where the special conditions allow both acid and lime-loving plants to grow side by side.

An old chalk mine is used as a winter roost by several species of bats.



Appendix 2 – Site of Special Scientific Interest Condition Analysis

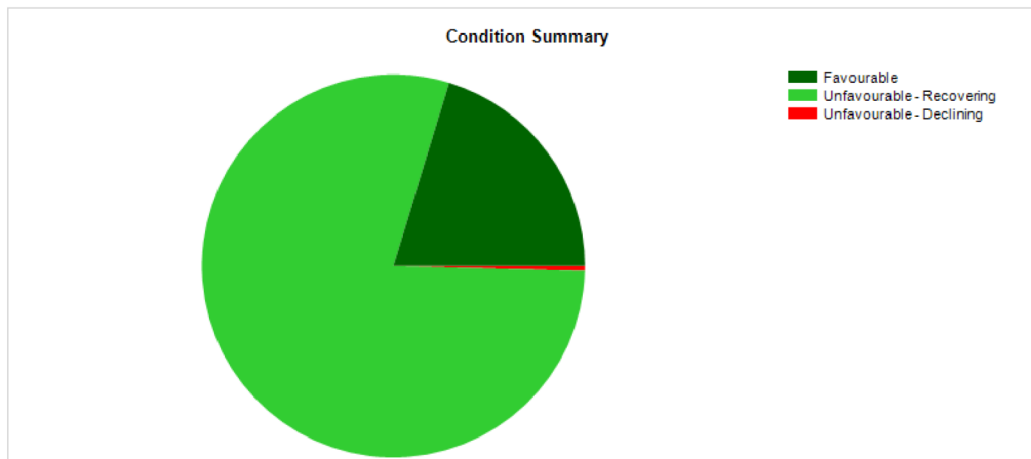
Appendix 2a – Ashdown Forest SSSI

Site: Ashdown Forest SSSI

Report generated on: 24 Jul 2017

	Sites	Units	Units Assessed
Total number	1	127	127
Total area (ha)	3,213.09	3,213.12	3,213.12

	% meeting area of favourable or unfavourable recovering	Favourable	Unfavourable - Recovering	Unfavourable - No change	Unfavourable - Declining	Partially destroyed	Destroyed	Not Assessed
Area (ha)	3,200.19	652.64	2,547.55		12.93			
Percentage	99.60%	20.31%	79.29%	0.00%	0.40%	0.00%	0.00%	0.00%



Appendix 2b – Mole Gap to Reigate Escarpment SSSI

Site: Mole Gap to Reigate Escarpment SSSI

Report generated on: 24 Jul 2017

	Sites	Units	Units Assessed
Total number	1	37	37
Total area (ha)	1,016.42	1,016.42	1,016.42

	% meeting area of favourable or unfavourable recovering	Favourable	Unfavourable - Recovering	Unfavourable - No change	Unfavourable - Declining	Partially destroyed	Destroyed	Not Assessed
Area (ha)	1,011.28	536.55	474.74	5.13				
Percentage	99.49%	52.79%	46.71%	0.51%	0.00%	0.00%	0.00%	0.00%

