

SURREY HEATH LOCAL PLAN 2011-2028



**CAMBERLEY TOWN CENTRE AREA ACTION
PLAN: INCORPORATING MAIN
MODIFICATIONS
HABITAT REGULATIONS ASSESSMENT**

February 2014

'Great Place, Great Community, Great Future'

Foreword

The Camberley Town Centre Area Action Plan (AAP) forms part of the Surrey Heath Local Plan 2011-2028. The AAP provides policy to guide the regeneration of Camberley Town Centre for major retail led development.

Habitats Regulation Assessment (HRA) is now an integral part of producing planning documents. The purpose of HRA is to consider the likely effects of a plan or project on internationally designated sites of nature conservation importance or Natura 2000 sites.

This version of the HRA of the Camberley Town Centre AAP includes consideration of the Main Modifications as suggested by an Independent Inspector following examination of the AAP in December 2013. Additions to this HRA as a result of the Main Modifications are highlighted in **bold text and underlined** for clarity.

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Contents

| | Page |
|---|-----------|
| Foreword | 1 |
| 1. Non-Technical Summary | 3 |
| 2. Introduction & Methodology | 5 |
| 3. HRA Screening | 7 |
| 4. Thames Basin Heaths SPA & Thursley, Ash, Pirbright & Chobham Common SAC – Screening | 16 |
| 5. Conclusion | 24 |
| Table 3-1 Other Plans with Potential In-Combination Impacts | |
| Table 3-2 Other Relevant Non-Land Use Plans | |
| Table 3-3 Large Projects within 7km of Thames Basin Heaths SPA | |
| Table 3-4 European Sites | |
| Figure N-1: Geographical Scope of the AAP | |
| Figure 1: Geographical Scope of the AAP | |
| Appendix A Main Modifications to the AAP | |

1. Non Technical Summary

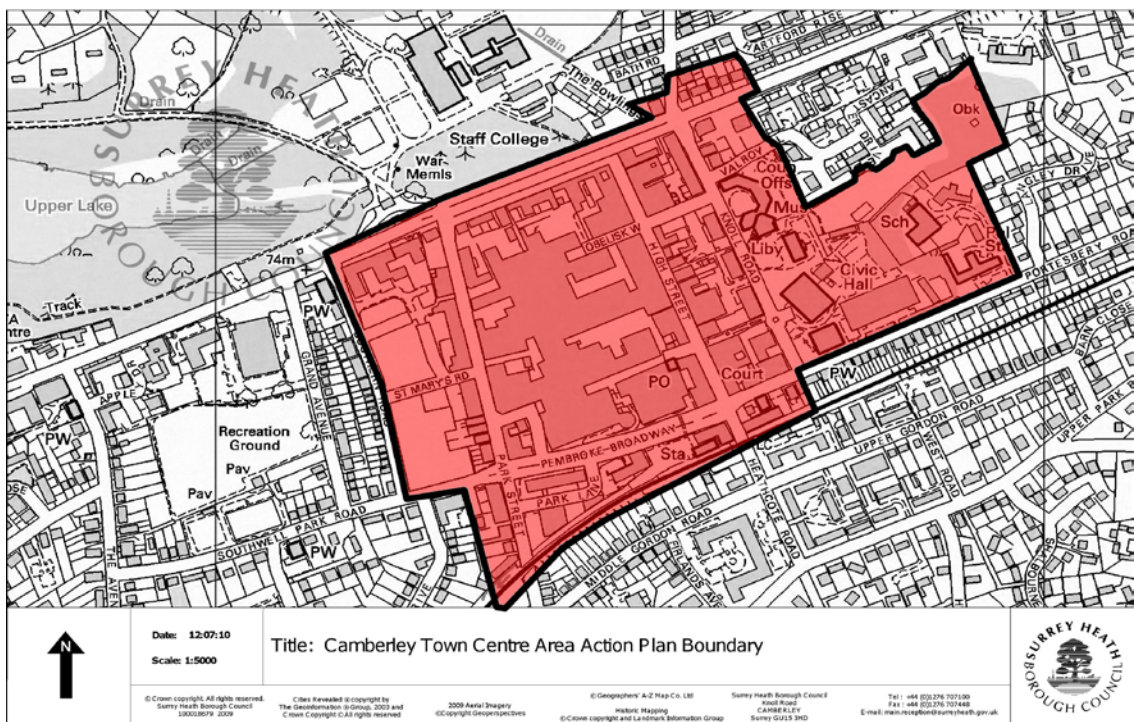
1.1 This non-technical summary sets out the process and key findings of the Habitats Regulation Assessment of the Camberley Town Centre AAP including the Main Modifications as suggested by an Independent Inspector following examination of the AAP in December 2013. Additions to this HRA as a result of the Main Modifications are highlighted in **bold text and underlined** for clarity. The Main Modifications are set out in Appendix A.

About the Camberley Town Centre Area Action Plan (AAP)

1.2 The Camberley Town Centre AAP will form part of Surrey Heath Local Plan 2011-2028 and is intended to guide future development within the town centre including major regeneration schemes likely to come forward over the plan period. The AAP will add further detail to adopted Policy CP10 of the Surrey Heath Core Strategy & Development Management Policies DPD.

1.3 The AAP will cover an area of approximately 31ha and will facilitate development of around 41,000sqm of retail floorspace and 200 dwellings with associated infrastructure and environmental enhancements. The geographical scope of the AAP is shown in Figure N-1.

Figure N-1: Geographic Scope of the AAP



Context & Appraisal

1.4 A Habitats Regulation Assessment is required to ensure that land use plans, such as the Camberley Town Centre AAP, do not adversely effect sites designated at European level for their nature conservation interests either alone or in combination with other

plans and projects.

- 1.5 The Camberley Town Centre AAP was assessed in accordance with the methodology set out in European and UK government guidance.
- 1.6 European sites which were more than a 15km straight line distance from the Camberley Town Centre AAP boundary (as shown in Figure N-1) were not assessed for recreational impacts as it was considered that the effects of the Camberley Town Centre AAP would not extend beyond this distance. The exception to this was the South West London Water Bodies SPA & Ramsar which attracts a specific type of recreational activity within a 17.7km radius.
- 1.7 No set distance was used to screen out other in-combination effects such as water resource, water quality and air quality as the effects for these impacts can be wider ranging and require consideration on their merits. For example air quality is a locally acting impact whereas water quality/resource can extend over large catchment areas.
- 1.8 The key findings of this Habitats Regulations Assessment are: -
 - Given the measures set out within the AAP **including the Main Modifications**, it can be concluded that there will be no significant effects to European sites arising from recreational/urbanising impacts.
 - Given the limited additional traffic generated by the AAP and that the major highway into the town centre (A30) does not lie within 200m of a European site it can be concluded, **taking into account the Main Modifications**, that there will be no significant effect to European sites from air quality impacts.
 - There are no pathways that exist which will effect water quality and there is sufficient water resource within the Surrey Heath area coupled with water efficiency measures in the AAP to not give rise to significant effects on European sites in terms of water availability, **including when taking account of the Main Modifications**.
- 1.9 As such, this Habitats Regulation Assessment has concluded that no significant effects to European sites arise from the Camberley Town Centre AAP, **incorporating Main Modifications**, either alone or in combination with other plans and projects.

2. Introduction & Methodology

Habitats Regulations Assessment

- 2.1 The requirement to consider the effects of plans or projects which may affect the integrity of internationally designated sites of nature conservation importance (Natura 2000 sites or European sites), stems from the European Habitats Directive (92/43/EEC as amended by amending acts 97/62/EC & 2006/105/EC). The Habitats Directive 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...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...' (Article 6(3))

- 2.2 The Habitats Directive has been transposed into UK law through The Conservation of Habitats and Species Regulations 2010. Specifically regulation 102 of the 2010 Regulations states that a land use plan, which includes Area Action Plans, should be subject to an appropriate assessment before the plan is given effect if it is likely to have a significant effect on a European Site.
- 2.3 The HRA must also take into account or assess the possible impact of the plan in combination with other plans and projects.
- 2.4 In terms of European sites to which the Habitats Directive applies, these include Special Protection Areas (SPA) and Special Areas of Conservation (SAC). In England, consideration should also be given to proposed SPAs, or SACs and Ramsar sites. Ramsar sites are those which are specifically designated for important wetland habitats.

The HRA Methodology

- 2.5 This HRA has been carried out in accordance with both the UK Governments draft guidance on undertaking Appropriate Assessment¹ and the European Commission (EC) Guidance².
- 2.6 Adopted Policy CP10 of the Core Strategy & Development Management Policies DPD (CSDMP) sets out the general requirements for development within Camberley Town Centre. As such the CSDMP parent policy from which the AAP is based has been assessed through HRA dated May 2011. As such, information in the HRA for the CSDMP will be tiered down to the Camberley Town Centre AAP HRA.
- 2.7 The EC guidance sets out the approach to decision making should be based on the precautionary principle, that is, the emphasis on the HRA is to objectively demonstrate with supporting evidence that there will be no significant effects on European sites.

¹ Planning for the Protection of European Sites: Appropriate Assessment (2006) CLG. Available at: <http://www.communities.gov.uk/documents/planningandbuilding/pdf/160442.pdf>

² Assessment of Plans & Projects Significantly Affecting Natura 2000 Sites: Methodological Guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC (2001) European Commission. Available at: http://ec.europa.eu/environment/nature/natura2000/management/docs/art6/natura_2000_assess_en.pdf

- 2.8 The EC guidance advocates a staged approach to undertaking HRA. The stages are: -
1. Screening;
 2. Appropriate Assessment
 3. Assessment of Alternative Solutions
 4. Assessment of Compensatory Measures (if significant effects remain).

Stage 1 - Screening

- 2.9 The Screening stage aims to ascertain the likely effects of a plan or project, either alone or in combination, upon European sites and attempts to objectively conclude whether these effects are significant or not. If it can be concluded at this stage that no significant effects arise, including a consideration of any mitigation/avoidance measures, then no other stages of HRA are required.

Stage 2 - Appropriate Assessment

- 2.10 If significant effects are likely, the Appropriate Assessment stage considers the impact of the plan or project on the integrity of European sites, in combination with other plans and projects, in terms of the sites conservation objectives, structure and function. This stage also considers possible mitigation measures. If no adverse effects remain then no further stages of HRA are required.

Stage 3 – Assessment of Alternative Solutions

- 2.11 If, even after having considered mitigation measures, adverse effects remain, then alternative solutions should be considered.

Stage 4 – Assessment of Compensatory Measures

- 2.12 Only where no alternatives are available and it can be demonstrated that imperative reasons of overriding public interest exist can compensatory measures be considered. Compensatory measures should only be seen as a last resort, and stages 1-3 must be undertaken prior to any consideration.
- 2.13 As such this HRA will be undertaken in accordance with the EC Guidance where appropriate, having regard to the HRA undertaken for the proposed Surrey Heath Core Strategy & Development Management Policies DPD. It should be noted however that both the Government and EC Guidance are methodological guidance only.

3. Stage 1 - Screening

3.1 The EC guidance sets out a four step approach to screening including: -

1. Determining whether the plan or project is directly connected to a European site;
2. Describing the project or plan and description and characterisation of other projects/plans which have potential for significant effects in combination;
3. Identifying potential effects on European sites;
4. Assessing the significance of any effects

Step 1

3.2 In terms of step one it can be determined that the Camberley Town Centre AAP is not directly connected with or necessary to the management of European sites.

Step 2 – Description of the Camberley Town Centre AAP and Other Plans/Projects with Potential In-Combination Effects

3.3 The Camberley Town Centre AAP will form part of the Surrey Heath Local Plan 2011-2028 and will be used to add further guidance to the specific policy set out in the Surrey Heath Core Strategy & Development Management Policies DPD. Core Strategy Policy CP10 sets the overall context for development and regeneration of Camberley Town Centre with the detail to guide and steer the form and location of future development set within the AAP.

3.4 Objective 13 of the Core Strategy & Development Management Policies DPD, relates to Camberley Town Centre and states: -

‘Promote the role of Camberley Town Centre as a secondary regional centre and as a safe and attractive retail, cultural and entertainment centre with a high quality environment’.

3.5 Policy CP10 of the Core Strategy (as adopted) states: -

‘The role of Camberley as a secondary regional town centre will be consolidated and enhanced through measures to improve shopping, business, leisure, cultural and community activities. Regeneration of the town centre to sustain vitality and viability and in particular address the high level of office vacancies within the town and the poor environmental quality along the London Road frontage will be promoted by the Borough Council. It is anticipated that up to 200 new homes could be delivered alongside some 41,000 square metres of gross retail floorspace in the period up to 2028.

New development should contribute toward some or all of the following as appropriate:

- **Serve the retail needs of the resident population and the working population within the catchment area for comparison and convenience goods;**
- **Support the role of the town centre as a centre for employment;**

- Enhance the role of the town centre as a centre for leisure and cultural activity within the Borough;
- Contribute to the enhancement of public transport services for the town centre and improvements to the local highway network including pedestrian and cycling facilities;
- Create a high quality well designed environment;
- Meeting the housing needs of the Borough;
- Aspire in residential schemes, to achieve CO₂ reduction and water efficiency in line with Code 6 of the Code for Sustainable Homes;
- Seek to achieve zero carbon and efficient use and recycling of other resources in new commercial or retail;
- Avoid having an impact upon the European Sites;
- Protecting and enhancing Public Open Space

An Area Action Plan for Camberley Town Centre will be prepared to address the delivery of the strategy.'

- 3.6 The geographic scope of the AAP is shown in Figure 1. The Camberley Town Centre AAP will cover an area of some 31ha. If implemented, the scale of development will be for some 41,000sqm of retail floorspace, 200 dwellings and associated infrastructure which would be delivered from 2016 onward.
- 3.7 The HRA undertaken on the Core Strategy and Development Management Policies DPD contained a list of plans and projects which 'in combination' with the Core Strategy & Development Management Policies DPD has potential to lead to significant effects. This is predominantly through the allocation of additional housing, employment, retail and transportation projects. Housing numbers for South East authority areas were based on the South East Plan which was revoked on the 25th March 2013 (with the exception of Policy NRM6 which relates to the Thames Basin Heaths SPA). As such the targets for those authorities that adopt a Core Strategy/Local Plan after revocation may increase or decrease from the numbers shown, however, given that revocation of the South East Plan is a recent event, the plans and projects listed in the HRA of the Core Strategy & Development Management Policies DPD are considered to remain relevant to the HRA for the Camberley Town Centre AAP.
- 3.8 The Thames Basin Heaths Delivery Framework³ also recognises that large projects within 7km of the Thames Basin Heaths SPA could give rise to significant effects, even though they sit outside a 5km zone of influence.
- 3.9 Relevant plans with their (pre-revocation) regional housing target are listed in Table 3-1 and other non-land use plans which are still relevant in combination are set out in Table 3-2. Large projects within 7km are set out in Table 3-3. It should be noted that the housing targets in Table 3-1 also include those contained within the London Plan (2004). A new London Plan is being prepared which could see housing targets for the London authorities increase/decrease.

³ Thames Basin Heaths Delivery Framework (2009) Thames Basin Heaths Joint Strategic Partnership Board. Available at:
<http://www.surreyheath.gov.uk/Surrey%20Heath%20Borough%20Council/Planning%20Policy%20and%20Conservation/deliveryframeworkmarch2009.pdf>

Table 3-1: Other Plans with Potential In-Combination Impacts

| Plan | Housing Target Per Annum | Total Housing Target |
|-----------------------------------|---------------------------------|-----------------------------|
| Bracknell Forest | 639 | 12,780 |
| Ealing | 915 | 9,150 |
| East Hampshire | 260 | 5,200 |
| East Hampshire (Whitehill/Bordon) | 275 | 5,500 |
| Elmbridge | 281 | 5,620 |
| Epsom and Ewell | 199 | 3,980 |
| Guildford | 422 | 8,440 |
| Hart | 220 | 4,400 |
| Hillingdon | 365 | 3,650 |
| Hounslow | 445 | 4,450 |
| Kingston-upon-Thames | 385 | 3,850 |
| Mole Valley | 188 | 3,760 |
| Reading | 611 | 12,220 |
| Richmond-upon-Thames | 270 | 2,700 |
| Runnymede | 286 | 5,720 |
| Rushmoor | 310 | 6,200 |
| Slough | 315 | 6,300 |
| South Buckinghamshire | 94 | 1,880 |
| South Oxfordshire | 547 | 10,940 |
| Spelthorne | 166 | 3,320 |
| Surrey Heath | 190 | 3,240 |
| Waverley | 250 | 5,000 |
| West Berkshire | 525 | 10,500 |
| Windsor & Maidenhead | 346 | 6,920 |
| Woking | 292 | 5,840 |
| Wokingham | 623 | 12,460 |
| Wycombe | 390 | 7,800 |
| Total | 9,809 | 171,820 |

Table 3-2: Other Relevant Non-Land Use Plans

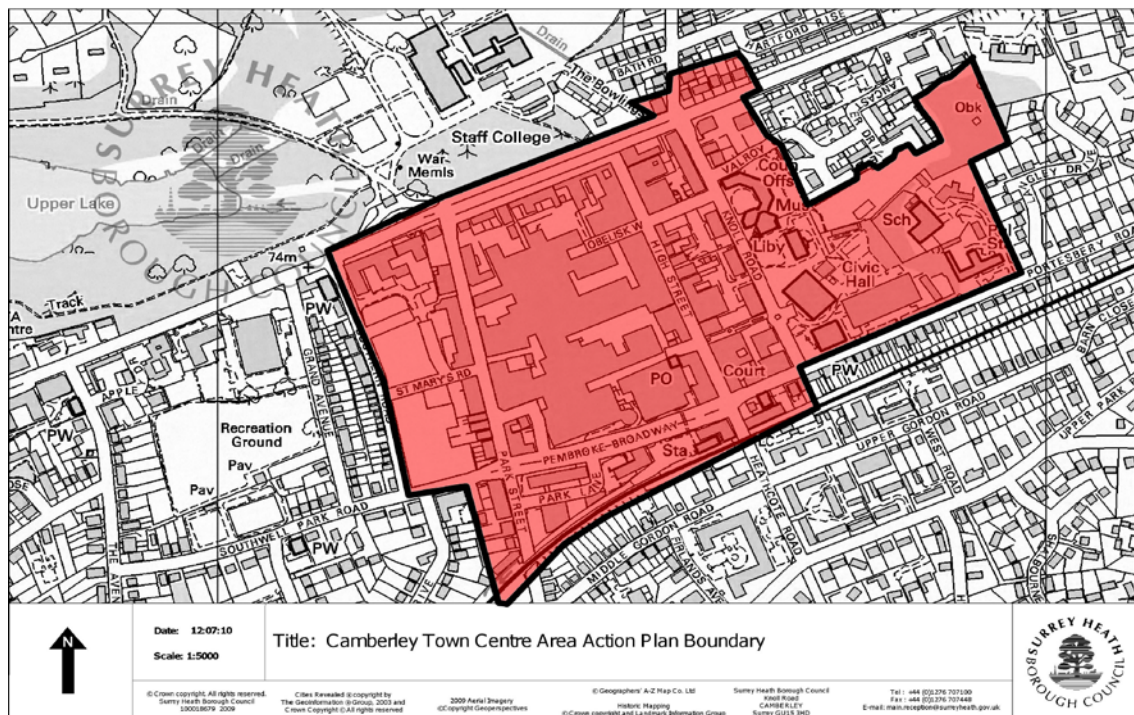
| Organisation | Plan |
|---------------------------------------|---|
| Surrey Heath Borough Council | Thames Basin Heaths SPA SPD (2012) |
| TBH Joint Strategic Partnership Board | Thames Basin Heaths Joint Delivery Framework (2009) |
| Environment Agency | Thames River Basin Management Plan (2009) |
| Environment Agency | Thames Catchment Flood Management Plan (2009) |
| Environment Agency | Loddon Catchment Abstraction Management Strategy (2008) |
| Environment Agency | Water Resources Strategy: Regional Action Plan for Thames Region (2009) |
| South East Water | Water Resource Management Plan (2010) |

Table 3-3: Planned Large Projects within 7km of Thames Basin Heaths SPA

| Project | Location | No. Dwellings |
|---------------------------|--------------------------------|---------------|
| Princess Royal Barracks | Deepcut, Surrey | 1,200 |
| Aldershot Urban Extension | Aldershot, Hants | 4,500 |
| Bracknell Town Centre | Bracknell, Berks | 1,000 |
| Land at Amen Corner | Binfield, Berks | 725 |
| Land North of Whitegrove | Warfield, Berks | 2,200 |
| DERA Site | Longcross, Surrey | 2,500 |
| Arborfield Garrison | Arborfield, Berks | 3,500 |
| South of Wokingham | Wokingham, Berks | 2,000 |
| North of Wokingham | Wokingham, Berks | 2,000 |
| South of M4 | Shinfield/Spencers Wood, Berks | 3,500 |
| Queen Elizabeth Barracks | Church Crookham, Hants | 1,000 |
| Total | | 24,125 |

3.10 It should be emphasised however that the housing numbers as listed in Table 3-3 are already subsumed into housing numbers within the plans considered in this HRA (as set out within Table 3-1). As such they are not on top of those plans already considered, aside from 1,000 dwellings at QEB, Church Crookham which is an allocation derived from the extant Hart Local Plan.

Figure 1 – Geographic Scope of the AAP



Step 3 – Identifying Potential Effects on European Sites

- 3.11 In order to assess whether significant effects are likely, it is necessary to identify those European sites which could be affected by the Camberley Town Centre AAP, **incorporating the Main Modifications**, either alone or in combination with other plans and projects and their conservation objectives. The HRA for the Core Strategy & Development Management Policies DPD already sets out a number of European sites which could be affected and these are considered relevant to the Camberley Town Centre AAP.
- 3.12 The Thames Basin Heaths Delivery Framework⁴ sets out a zone of influence for large development sites which may give rise to significant effects on European sites. This zone of influence extends to a straight line distance of 7km from the boundary of a large site to the boundary of European sites, specifically the Thames Basin Heaths SPA. However, this zone of influence is in relation to recreational impacts only, and as such the scope of assessing possible European sites will be extended beyond a 7km distance.

The European Sites

- 3.13 The European sites considered in this HRA are the same as those contained within the HRA for the Core Strategy & Development Management Policies DPD. Further, those pathways of effects identified in the Core Strategy & Development Management Policies DPD (CSDMP) HRA for each European site are equally applicable to this HRA and no other pathways have been identified. **The Main Modifications to the AAP also do not identify any further sites or pathways over and above those identified in the CSDMP HRA.** The identification of sites has revealed 5 potential effects (not common to all sites) which are recreational impacts, urbanisation, air and water quality and water resource.
- 3.14 Table 3-4 sets out the European sites and their distance from the Camberley Town Centre AAP boundary with identification of potential effects on each European site.

Table 3-4 – European Sites

| Natura 2000 Site | Distance from Camberley Town Centre AAP Boundary | Identified Potential Effects | Further Consideration Required? |
|---|--|--|---------------------------------|
| Thames Basin Heaths SPA | 720m to closest point at Broadmoor to Bagshot Woods SSSI | <ul style="list-style-type: none"> • Recreation • Air quality • Urbanisation • Water Resource | Yes |
| Thursley, Ash, Pirbright and Chobham Common SAC | 2.9km | <ul style="list-style-type: none"> • Recreation • Urbanisation • Air Quality • Water Quality • Water Resource | Yes |
| Windsor Forest & Great Park SAC | 11.5km | <ul style="list-style-type: none"> • Recreation | No |
| South West London Water Bodies SPA & Ramsar | 16.7km | <ul style="list-style-type: none"> • Recreation | No |

⁴ Thames Basin Heaths Delivery Framework (2009) Thames Basin Heaths Joint Strategic Partnership Board. Available at: <http://www.surreyheath.gov.uk/Surrey%20Heath%20Borough%20Council/Planning%20Policy%20and%20Conservation/deliveryframeworkmarch2009.pdf>

| Natura 2000 Site | Distance from Camberley Town Centre AAP Boundary | Identified Potential Effects | Further Consideration Required? |
|--|--|---|---------------------------------|
| Thursley, Hankley & Frensham Commons SPA | 16.8km | <ul style="list-style-type: none"> • Recreation • Air Quality | No |
| Thursley & Ockley Bog Ramsar | 18km | <ul style="list-style-type: none"> • Water Resource • Water Quality | No |
| Mole Gap to Reigate Escarpment SAC | 28.5km | <ul style="list-style-type: none"> • Recreation • Air Quality | No |
| Wealden Heaths Phase II SPA | 21.5km | <ul style="list-style-type: none"> • Recreation | No |
| East Hants Hangars SAC | 24.3km | <ul style="list-style-type: none"> • Recreation | No |
| Burnham Beeches SAC | 24.5km | <ul style="list-style-type: none"> • Recreation • Air Quality | No |

3.15 A brief discussion of each effect identified in Table 3-4 is set out below.

Recreation and Urbanisation

3.16 Recreational pressures are considered to arise due to the increase in human population that is likely to occur with new residential development. As such new development can give rise to recreational pressures and when viewed in combination with development set out in other plans and projects can give rise to cumulative impacts. Increasing general recreation such as walking and dog walking can lead to deterioration and fragmentation of habitats as well as eutrophication from dog fouling. Increased recreation can also lead to the disturbance of protected species, especially ground nesting birds⁵.

3.17 Urbanisation impacts arise due to development and increased human population encroaching close to protected habitats. Urbanising effects include increased potential for predation by household pets, increase incidences of fly-tipping, vandalism including fire and potential for species invasion.

Air Quality

3.18 The main pollutants of concern for European sites are oxides of nitrogen (NO_x), Ammonia (NH₃) and Sulphur Dioxide (SO₂). Nitrogen oxides can have a directly toxic effect on vegetation and along with ammonia can lead to increased nitrogen deposition on European sites (See reference 4). Nitrogen deposition is an issue for nutrient poor habitats such as lowland heaths and it is this facet of air quality impacts that this HRA considers.

3.19 Sulphur Dioxide emissions are associated with outputs from power stations and ammonia is more generally linked to agricultural practices and as such are not considered to be a result of local development and are not considered further in this HRA being beyond the scope and control of the Camberley Town Centre AAP. Oxides of nitrogen on the other hand can arise from traffic emissions and these are linked to increased development.

⁵ Surrey Heath Core Strategy & Development Management Policies DPD: Habitats Regulation Assessment (2010) Scott Wilson. Available at: <http://www.surreyheath.gov.uk/Surrey%20Heath%20Borough%20Council/Planning%20Policy%20and%20Conservation/FinalHRAwithMaps.pdf>

- 3.20 In terms of air quality effects, at a local level these will derive from emissions from traffic associated with new development, either alone or in combination. Development can also cumulatively impact upon background air quality levels at a much wider scale than local level. However, advice from Natural England to Runnymede Borough Council in July 2006, states that for the purposes of Local Plans, these '*can only be concerned with locally emitted and short range locally acting pollutants*'.
- 3.21 The Department for Transport's Transport Analysis Guidance⁶ states that 'beyond 200m the contribution of vehicle emissions from the roadside to local pollution levels is not significant. As such, this HRA concerns itself with those emissions likely to arise from traffic within 200m of a European site.
- 3.22 According to the World Health Organisation the critical threshold associated with the protection of vegetation is 30µgm⁻³ for NO_x and 20µgm⁻³ SO₂. The Air Pollution Information web-site⁷ also sets out critical load thresholds for nitrogen deposition, according to habitat type. These thresholds will be considered when assessing local air quality effects.

Water Resource

- 3.23 Surrey Heath Borough and hence Camberley Town Centre lie in an area designated by DEFRA as water stressed. Camberley Town Centre lies within South East Water's Resource Zone 4, which according to their Water Resource Management Plan (WRMP)⁸ is expected to remain in surplus up to 2035, albeit from transferring water from Resource Zone 5 and planning for additional supply.
- 3.24 In addition the Environment Agency has produced a Catchment Abstraction Management Strategy (CAMS) for the river Loddon⁹ which to some degree covers the Camberley area of Surrey Heath. The west of Surrey Heath is located within Water Resource Management Unit (WRMU) 2 in the Loddon CAMS which is assessed as having 'water available'.
- 3.25 However, the groundwater unit in the Loddon catchment is considered to be over licensed.

Water Quality

- 3.26 Camberley lies within the river catchment of the Loddon. According to the Thames River Basin Management Plan¹⁰, the river Loddon unit applicable to Camberley Town Centre is unit R9, the river Blackwater. Ecological quality of the river Blackwater is moderate and this is predicted to remain moderate by 2015 with the objective of achieving good status by 2027.

⁶ Transport Analysis Guidance (2004) Department for Transport. Available at: <http://www.dft.gov.uk/webtag/documents/expert/unit3.3.3.php>

⁷ <http://www.apis.ac.uk>

⁸ Water Resource Management Plan 2010-2035: Revised January 2010 (2010) South East Water. Available at: http://siteadmin.southeastwater.co.uk/pls/apex/PROD.download_file?p_doc_id=223

⁹ Loddon Catchment Abstraction Management Strategy (2003) Environment Agency. Available at: <http://publications.environment-agency.gov.uk/pdf/GETH0903BNUG-E-E.pdf>

¹⁰ Thames River Basin Management Plan (2009) Environment Agency. Available at: <http://wfdconsultation.environment-agency.gov.uk/wfdcms/en/thames/Intro.aspx>

- 3.27 The EC guidance states that when considering whether significant effects arise, this should be undertaken in the absence of avoidance or mitigating measures set out in the plan or project. However, the High Court of Justice Ruling¹¹ (also known as Dilly Lane) in 2008 states that avoidance and mitigation measures can be taken into account at the screening stage. As such, when assessing the significance of any effects from the Camberley Town Centre AAP on European sites, any avoidance or mitigation measures expressed in the AAP or which have already been secured through other plans or projects will be taken into account during the screening process. The rest of this section considers the reasons for not considering potential effects to some European sites in more detail.

Step 4 – Assessing the Significance of Effects

- 3.28 With respect to effects arising from recreational pressure, the Thames Basin Heaths Delivery Framework identifies a zone of influence around the SPA (as well as the Thursley, Ash, Pirbright & Chobham Common SAC which is also designated Thames Basin Heaths SPA) such that any development within this zone will lead to recreational pressures on the SPA. In terms of large sites, this zone of influence is a 7km linear distance from the SPA boundary. As such, large scale residential development which occurs more than 7km from the SPA will not give rise to significant effects from recreational pressures. Those large residential projects within 7km of the SPA will require their own bespoke avoidance measures and will be subject to separate HRA. As such, any in-combination impacts arising from the projects as set out in Table 3-3 can be discounted as they will in effect be neutral.
- 3.29 When considering whether significant effects are likely in terms of recreational impacts on sites other than the Thames Basin Heaths SPA or Thursley, Ash, Pirbright & Chobham Common SAC a 15km radius of the Camberley Town Centre AAP boundary has been included. It is considered that beyond a 15km radius no pathway for recreational impact exists (with the exception of South West London Water Bodies SPA and Ramsar for the reasons explained in para 3.31 below). Other in-combination impacts have been considered on a case by case basis rather than applying a blanket distance as this will depend on the impact pathway.

Recreation & Urbanisation

- 3.30 There are three European sites where recreational pressures have been identified and which lie within 15km of the AAP boundary. Two of these are the Thames Basin Heaths SPA and Thursley, Ash, Pirbright & Chobham Common SAC which will be considered in more detail in section 4. The other is the Windsor Forest & Great Park SAC which lies 11.5km from the AAP boundary. However, a study undertaken in 1993¹² identified that visitors to the Windsor Forest and Great Park SAC tended to live around 8km from the site. The boundary of the AAP is 11.5km from the SAC and as such lies outside the visitor catchment area.
- 3.31 An England Leisure Day Visits survey indicates that the average distance travelled to an 'inland water body without boats' for the day is 17.7km. As such the Camberley Town Centre AAP could give rise to visitors to the South West London Water Bodies SPA & Ramsar, being within 16.7km. However, visitor numbers to St Ann's Lake

¹¹ R on the application of Hart DC v S.O.S for Communities and Local Government and Ors [2008] EWHC 1204.

¹² Bellringer, A. & Gillam, S. (1998) Forest Visitor Surveys – 1994 and Earlier Years. Forestry Commission.

(Thorpe Park No.1 gravel pit) for such activities is controlled and occurs at the opposite end of the Lake to where waterfowl winter. Therefore, unless there is a change to the current access policy, which is beyond the scope of the Camberley Town Centre AAP, recreational pressure will not exceed current (acceptable) levels.

- 3.32 Therefore, based on the objective information available at the time of writing this HRA, it can be concluded that the Camberley Town Centre AAP will not, in-combination with other plans/projects, lead to significant effects on any of the European Sites identified in terms of recreational impacts. However, the consideration of recreational impact to the Thames Basin Heaths SPA and Thursley, Ash, Pirbright & Chobham Common SAC has been considered in more detail in section 4.
- 3.33 In terms of urbanisation, effects are linked with residential development and are greatest when development occurs within 400m of a European site. The Camberley Town Centre AAP proposes at least 200 dwellings all of which will be sited outside a 400m linear distance. Policy CP14B of the CSDMP does not allow any net residential development to be permitted within 400m of the Thames Basin Heaths SPA, as does the Thames Basin Heaths Delivery Framework.
- 3.34 As such there is no pathway for urbanising impacts to occur from the AAP either alone or in-combination. Therefore, it can be concluded based on the objective information available at the time of writing this HRA that the Camberley Town Centre AAP will not lead to significant effect on any of the European sites identified in terms of urbanising impacts. **None of the Main Modifications to the AAP would give rise to any urbanising impacts and modification MM1 is likely to strengthen protection for European sites.**

Water Resource/Quality

- 3.35 Unless European sites are in the same river or abstraction catchment unit(s) as Camberley Town Centre, then there are no pathways of effect on sites where water quality or water resource has been identified as an issue. This essentially screens out the Thursley & Ockley Bog Ramsar site as there are no pathways by which the Camberley Town Centre AAP, **incorporating the Main Modifications** could affect this site. As such, on the objective information available at the time of writing this HRA it can be concluded that there will be no significant effect on the Thursley & Ockley Bog Ramsar in terms of water resource or quality. The effects on the Thames Basin Heaths SPA and Thursley, Ash, Pirbright & Chobham Common SAC are considered in more detail in section 4.

Air Quality

- 3.36 There are 5 European sites where air quality effects could have potential impacts. Of these sites Thursley, Hankley & Frensham Commons SPA, Mole Gap to Reigate Escarpment SAC and Burnham Beeches SAC fall outside of the primary catchment area of Camberley Town Centre. Therefore there is no pathway for effect with respect to air quality impacts arising from traffic emissions.
- 3.37 As such, on the objective information available at the time of writing this HRA it can be concluded that there will be no significant effect on any of the European sites identified either alone or in-combination with other plans/projects with respect to air quality. However, the consideration of air quality on the Thames Basin Heaths SPA and Thursley, Ash, Pirbright & Chobham Common SAC has been considered in more detail in section 4.

4. Thames Basin Heaths SPA & Thursley, Ash, Pirbright & Chobham Common SAC – Further Consideration of Effects

Thames Basin Heaths SPA

- 4.1 The Thames Basin Heaths SPA comprises a series of lowland heathland areas across Surrey, Hampshire and Berkshire and is around 8,274ha in area. It comprises 13 SSSI units of which 3 also form part of the Thursley, Ash, Pirbright and Chobham Common SAC and 5 of which lie within 7km of the Camberley Town Centre AAP. The habitat is formed predominantly from Heath and scrub with areas of coniferous woodland, broad leaved deciduous forest, bogs, marshes and inland water bodies¹³. Around 75% of the SPA is publicly accessible and covers approximately 23% of the Borough of Surrey Heath¹⁴.
- 4.2 The SPA is home to three species of migratory Annex 1 birds, Nightjar (*Caprimulgus europaeus*), Woodlark (*Lullula arborea*) and Dartford Warbler (*Sylvia undate*). The birds are ground or near ground nesting and are susceptible to predation and disturbance. The breeding population supported by the Thames Basin Heaths is: -
- | | |
|------------------|---------------------------------|
| Nightjar | 7.8% of GB breeding population |
| Woodlark | 9.9% GB breeding population |
| Dartford Warbler | 27.8% of GB breeding population |
- 4.3 The environmental conditions which support the European features of interest are: -
- Appropriate management
 - Management of disturbance during breeding season (March to July)
 - Minimal air pollution
 - Absence or control of urbanisation effects, such as fires and introduction of invasive non native species
 - Maintenance of appropriate water levels
 - Maintenance of water quality
- 4.4 The potential effects of the Camberley Town Centre AAP on the Thames Basin Heaths SPA were outlined in Table 3-4. These will now be looked at in more detail to identify whether any of these effects are significant.

Recreational Pressure & Urbanisation

- 4.5 Recreation and urbanisation impacts are relevant in terms of residential development only. There is no evidence for recreational pressures or urbanizing impacts to arise from non-residential development outside of a 400m zone of influence around the SPA. Within a 400m to 5km zone the Thames Basin Heaths Delivery Framework identifies that all net additional dwellings will give rise to significant effects due to recreational pressures. However, the delivery framework also sets out that development can provide or make a contribution towards measures to ensure that these effects are not significant and therefore avoid impact.

¹³ Information taken from Natura 2000 Standard Data form, available at:

<http://www.jncc.gov.uk/pdf/SPA/UK9012141.pdf>

¹⁴ Surrey Heath Core Strategy & Development Management Policies submission DPD (2010) Surrey Heath Borough Council. Available at:

<http://www.surreyheath.gov.uk/planning/planningpolicyandconservation/CoreStrategyDPD.htm>

- 4.6 The delivery framework focuses on two aspects of a three pronged approach to avoiding significant effects; providing Suitable Alternative Natural Greenspace (SANG) and access management. Habitat management, the third prong, is to be dealt with by Natural England working with landowners.
- 4.7 Key messages arising from the delivery plan are: -
- Within 400m of the SPA it is not possible to conclude no adverse impact from development;
 - Avoidance measures should be applied to development within a zone of influence of 400m-5km (7km for large developments) linear distance from the SPA.
 - Avoidance measures include provision of SANG at 8ha per 1,000 population;
 - Access management to be coordinated by Natural England in line with an overarching strategy for access management.
- 4.8 With these avoidance measures in place the delivery framework accepts that no likely significant effects will arise from recreation, either alone or in-combination.
- 4.9 The Camberley Town Centre AAP identifies new residential development of at least 200 units and as such sufficient measures to avoid significant effects must be in place prior to permission being granted. The AAP does not expect 200 units to come forward from any one site but from a range of sites across the town centre. **This now includes the potential capacity of 50 units at Ashwood House as set out in the Main Modifications.**
- 4.10 In order for new residential development to avoid recreational impacts to the Thames Basin Heaths SPA, it must contribute toward the provision of SANG at the 8ha per 1,000 population standard either by providing its own bespoke SANG solution or by contributing financially toward SANG managed by the Borough Council or another public body. The Borough Council has already ring-fenced an area of SANG at Blackwater Park specifically for this development. As such, it is considered in the case of residential development coming forward within Camberley Town Centre that avoidance will be in the form of a financial contribution.
- 4.11 It is noted that the AAP considers the allocation of at least 200 residential units and as such contains the potential for additional units above and beyond this number **including any additional capacity from Ashwood House or any other site within the town centre.** The Borough Council is unlikely to have sufficient SANG ring-fenced for more than 200 units. However, Policy TC1 of the AAP states that development that results in harm to the Thames Basin Heaths SPA will not be permitted and Policies CP3 and CP14B of the Core Strategy & Development Management Policies DPD (CSDMP) contain similarly strong wording. **Further, Main Modification MM1 reinforces that residential development must undergo an appropriate assessment.** Therefore if insufficient SANG is in place at the time an application for new residential development is considered, permission will be refused. The combination of these policies, **including Main Modification MM1** therefore acts as a fail safe mechanism, so that impact is either avoided through provision of SANG or avoided through the permission being refused.
- 4.12 Further, the closest that new residential development allocated by the AAP would be sited from the Thames Basin Heaths is some 720m (London Road) well outside of the 400m exclusion zone.

- 4.13 On the basis of SANG provision at Blackwater Park, policies in both the AAP **incorporating the Main Modifications** and CSDMP and that no residential development is within 400m of the SPA, it can be concluded on the objective information provided at the time of writing this HRA that there will be no likely significant effect on the Thames Basin Heaths SPA either alone or in-combination with other plans/projects, from recreational pressures or urbanising impacts.

Air Quality

- 4.14 Development within Camberley Town Centre as identified in the AAP could give rise to additional traffic on the local highway compared to the current baseline and in turn give rise to traffic emissions. Increased emissions have the potential to affect the Thames Basin Heaths SPA where it lies within 200m of a local highway. A higher number of trips on the strategic highway network, such as the M3 motorway which passes through Surrey Heath, require a strategic level assessment which is beyond the control and scope of the Camberley Town Centre AAP. As such emissions from strategic highway networks will not be considered in this HRA.
- 4.15 The level of retail development proposed in the Camberley Town Centre AAP (and CSDMP Policy CP10) is based on retention of market share and not increasing trade draw from other centres. The level of residential development associated with this is low at 200 dwellings. Therefore, traffic associated with the redevelopment of the town centre will be local in nature and with no increase in market share will not attract significant traffic numbers above and beyond those already experienced. This is highlighted by the Borough Council's transport assessments undertaken as evidence to support the adopted Core Strategy.
- 4.16 One transport assessment considered the Borough as a whole¹⁵ and one with a wider study area to consider impacts on the M3 junctions 3-4A¹⁶. Both transport assessments took account of background growth in traffic numbers to 2026 (growth in traffic irrespective of whether development takes place or not) as well as planned development within the Borough arising from the Core Strategy including Camberley Town Centre. The assessments took no account of any mitigation or intervention measures such as highway improvements or sustainable transport measures. As such the assessments acted as a worst case scenario and considered in-combination traffic impacts.
- 4.17 The Borough wide study estimated that the number of additional trips generated in the Camberley Zone (including the town centre) in the am peak period (08:00-09:00) with all planned development from the Core Strategy would be 59.6 additional departures and 112.5 additional arrivals (in 2026). However this has to be seen in the context that even if there were no planned development, traffic would increase by 42.4 additional departures and -9.8 additional arrivals. This is a net 17.2 additional departures and 122.3 additional arrivals. Further, the M3 study which includes development within Rushmoor & Hart as well as Surrey Heath highlights that the maximum number of additional trips (arrivals and departures) on the A30 is 280. This is not considered to

¹⁵ Transport Evaluation for Surrey Heath Borough Council's Core Strategy (2010) Surrey County Council. Available at: http://www.surreyheath.gov.uk/documents/retrieve.htm?pk_document=9447

¹⁶ Transport Assessment for the M3 Corridor J3-4A Joint LDF Study (2011) Surrey County Council. Available at: <http://www.surreyheath.gov.uk/Surrey%20Heath%20Borough%20Council/Planning%20Policy%20and%20Conservation/CDSHBC415aTransportAssessmentforM3Corridor.pdf>

be significant in terms of air quality impacts. **None of the Main Modifications suggested will change traffic numbers significantly above these numbers.**

- 4.18 Further, the highway in the Camberley Zone (A30 – London Road from Meadows Gyratory to Knoll Road) which would see the majority of this increase does not lie within 200m of the SPA and as such there is no pathway for impacts to occur in any event.
- 4.19 Therefore, it is considered, based on the objective information available at the time of writing this HRA that it can be concluded that the Camberley Town Centre AAP, **incorporating Main Modifications** will not give rise to significant effects on the Thames Basin Heaths SPA either alone or in combination with other plans/projects in terms of air quality impacts.

Water Resource & Water Quality

- 4.20 Parts of the Thames Basin Heaths SPA sit within the same river or abstraction zone as Camberley Town Centre. The Loddon Catchment Abstraction Management Strategy (CAMS) indicates this zone as having 'water available'. Further, any abstraction licences granted by the Environment Agency would be subject to HRA in any event. As such it is considered, given the availability of water, the avoidance measures in the form of water efficiency criteria set out in AAP policy TC1 and that abstraction licences would have to be subject to HRA, **that the AAP incorporating the Main Modifications**, will have no significant effect on the SPA either alone or in combination with other plans and projects.
- 4.21 In terms of water quality, the Thames River Basin Management Plan shows Camberley Town Centre located within areas where the ecological quality of river water is 'moderate' as well as sitting atop a confined aquifer where infiltration of contaminants is unlikely. Further, the topography of the Borough is such that Camberley Town Centre sits lower than the surrounding heathland areas and therefore likely flow directions from surface water run-off will be away from the SPA. As such, there are no downstream mechanisms for development at Camberley Town Centre to effect water quality at the SPA. As such, no pathways exist which, could lead to significant effects to the SPA.

Conclusion

- 4.22 On the basis of the objective information that is available at the time of writing this HRA, it can be concluded that the Camberley Town Centre AAP, **incorporating the Main Modifications** would not have significant effects on the Thames Basin Heaths SPA either alone or in combination with other plans/projects.

Thursley, Ash, Pirbright and Chobham Common SAC

- 4.23 The Thursley, Ash, Pirbright and Chobham Common SAC is comprised of four SSSI units, three of which form part of the Thames Basin Heaths SPA and one of which forms part of the Thursley, Hankley and Frensham Commons SPA. The SSSI units located within Surrey Heath are the Ash to Brookwood Heaths, Colony Bog and Bagshot Heath and Chobham Common.

- 4.24 The SAC covers an area of some 5,138ha and comprises habitat containing predominantly dry and wet heaths with coniferous woodland, bogs, marshes and inland water bodies¹⁷. The MOD is a major land owner and a memorandum of understanding exists between the MOD and Natural England through which the impact of military activities is regulated.
- 4.25 The environmental conditions which support the SAC are: -
- Appropriate management;
 - Managed recreational pressure;
 - Minimal air pollution;
 - Absence or control of urbanisation effects such as fires and introduction of invasive non-native species;
 - Maintenance of appropriate water levels;
 - Maintenance of water quality.
- 4.26 The potential effects of the Camberley Town Centre AAP on the Thursley, Ash, Pirbright and Chobham Common SAC were outlined in Table 3-4. These will now be looked at in more detail to identify whether any of these effects are significant.

Recreational Pressure & Urbanisation

- 4.27 Recreation and urbanisation impacts are relevant in terms of residential development only. There is no evidence for recreational pressures or urbanizing impacts to arise from non-residential development outside of a 400m zone of influence around the SPA including those areas which also form part of the Thursley, Ash, Pirbright & Chobham Common SAC. Within a 400m to 5km zone the Thames Basin Heaths Delivery Framework identifies that all net additional dwellings will give rise to significant effects due to recreational pressures. However, the delivery framework also sets out that development can provide or make a contribution towards measures to ensure that these effects are not significant and therefore avoid impact.
- 4.28 The delivery framework focuses on two aspects of a three pronged approach to avoiding significant effects; providing Suitable Alternative Natural Green Space (SANGS) and access management. Habitat management, the third prong, is to be dealt with by Natural England working with landowners.
- 4.29 Key messages arising from the delivery plan are: -
- Within 400m of the SPA it is not possible to conclude no adverse impact from development;
 - Avoidance measures should be applied to development within a zone of influence of 400m-5km (7km for large developments) linear distance from the SPA.
 - Avoidance measures include provision of SANGS at 8ha per 1,000 population;
 - Access management to be coordinated by Natural England in line with an overarching strategy for access management.
- 4.30 With these avoidance measures in place the delivery framework accepts that no likely significant impacts will arise from recreation, either alone or in-combination. This is as relevant to the Thursley, Ash, Pirbright & Chobham Common SAC as it is to the

¹⁷ Information taken from Natura 2000 Standard Data Form. Available at: <http://www.jncc.gov.uk/protectedsites/sacselection/n2kforms/UK0012793.pdf>

Thames Basin Heaths SPA.

- 4.31 The Camberley Town Centre AAP identifies new residential development of at least 200 units and as such sufficient measures to avoid impact must be in place prior to permission being granted. The AAP does not expect 200 units to come forward from any one site but from a range of sites across the town centre. **This now includes the potential capacity of 50 units at Ashwood House as set out in the Main Modifications.**
- 4.32 In order for new residential development to avoid recreational impacts to the Thursley, Ash, Pirbright & Chobham Common SAC, it must contribute toward the provision of SANG at the 8ha per 1,000 population standard either by providing its own bespoke SANG solution or by contributing financially toward SANG managed by the Borough Council or another public body. The Borough Council has already ring-fenced an area of SANG at Blackwater Park specifically for this development. As such, it is considered in the case of residential development coming forward within Camberley Town Centre that avoidance will be in the form of a financial contribution.
- 4.33 It is noted that the AAP considers the allocation of at least 200 residential units and as such contains the potential for additional units above and beyond this number **including any additional capacity from Ashwood House or any other site within the town centre.** The Borough Council is unlikely to have sufficient SANG ring-fenced for more than 200 units. However, Policy TC1 of the AAP states that development that results in harm to the Thames Basin Heaths SPA (which includes the Thursley, Ash, Pirbright & Chobham Common SAC) will not be permitted and Policies CP3 and CP14B of the CSDMP contain similarly strong wording. **Further, Main Modification MM1 reinforces that residential development must undergo an appropriate assessment.** Therefore if insufficient SANG is in place at the time an application for new residential development is considered, permission will be refused. The combination of these policies, **including Main Modification MM1** therefore acts as a fail safe mechanism, so that impact is either avoided through provision of SANG or avoided through an application being refused.
- 4.34 Further, the closest that new residential development allocated by the AAP would be sited from the Thursley, Ash, Pirbright & Chobham Common SAC is some 2.8km.
- 4.35 Therefore on the basis of SANG provision at Blackwater Park, fail safe policies in both the AAP **incorporating the Main Modifications** and CSDMP and that no residential development is within 400m of the SAC, that it can be concluded on the objective information provided at the time of writing this HRA that there will be no likely significant effect on the Thursley, Ash, Pirbright & Chobham Common SAC, either alone or in-combination with other plans/projects, from recreational pressures or urbanising impacts.

Air Quality

- 4.36 Development within Camberley Town Centre as identified in the AAP could give rise to additional traffic on the local highway compared to the current baseline and in turn give rise to traffic emissions. Increased emissions have the potential to affect the Thursley, Ash, Pirbright & Chobham Common SAC where it lies within 200m of a local highway. A higher number of trips on the strategic highway network, such as the M3 motorway which passes through Surrey Heath, require a strategic level assessment which is beyond the control and scope of the Camberley Town Centre AAP. As such emissions from strategic highway networks will not be considered in this HRA.

- 4.37 The level of retail development proposed in the Camberley Town Centre AAP (and CSDMP Policy CP10) is based on retention of market share and not increasing trade draw from other centres. The level of residential development associated with this is low at 200 dwellings. Therefore, traffic associated with the redevelopment of the town centre will be local in nature and with no increase in market share will not attract significant traffic numbers above and beyond those already experienced. This is highlighted by the Borough Council's transport assessments undertaken as evidence to support the adopted Core Strategy.
- 4.38 One assessment considered the Borough as a whole¹⁸ and one with a wider study area to consider impacts on the M3 junctions 3-4A¹⁹. Both transport assessments took account of background growth in traffic numbers to 2026 (growth in traffic irrespective of whether development takes place or not) as well as planned development within the Borough arising from the Core Strategy including Camberley Town Centre. The assessments took no account of any mitigation or intervention measures such as highway improvements or sustainable transport measures. As such the assessments acted as a worst case scenario and considered in-combination traffic impacts.
- 4.39 The Borough wide study estimated that the number of additional trips generated in the Camberley Zone (including the town centre) in the am peak period (08:00-09:00) with all planned development from the Core Strategy would be 59.6 additional departures and 112.5 additional arrivals (in 2026). However this has to be seen in the context that even if there were no planned development, traffic would increase by 42.4 additional departures and -9.8 additional arrivals. This is a net 17.2 additional departures and 122.3 additional arrivals. Further, the M3 study which includes development within Rushmoor & Hart as well as Surrey Heath highlights that the maximum number of additional trips (arrivals and departures in am peak) on the A30 is 280. **None of the Main Modifications suggested will change traffic numbers significantly above these numbers.**
- 4.40 Further, the stretch of highway in the Camberley Zone (A30) which would see the majority of this increase does not lie within 200m of the SAC and as such there is no pathway for impacts to occur in any event.
- 4.41 Therefore, it is considered, based on the objective information available at the time of writing this HRA that it can be concluded that the Camberley Town Centre AAP, **incorporating Main Modifications**, will not give rise to significant effects on the Thursley, Ash, Pirbright & Chobham Common SAC either alone or in combination with other plans/projects in terms of air quality impacts.

Water Resource & Water Quality

- 4.42 Parts of the Thursley, Ash, Pirbright and Chobham Common SAC sit within the same river or abstraction zone as Camberley Town Centre. The Loddon Catchment Abstraction Management Strategy (CAMS) shows this zone as having 'water available'. As such it is considered, given the availability of water, efficiency measures set out in the AAP in Policy TC1 and that any additional licensing for abstraction would

¹⁸ Transport Evaluation for Surrey Heath Borough Council's Core Strategy (2010) Surrey County Council. Available at: http://www.surreyheath.gov.uk/documents/retrieve.htm?pk_document=9447

¹⁹ Transport Assessment for the M3 Corridor J3-4A Joint LDF Study (2011) Surrey County Council. Available at:

<http://www.surreyheath.gov.uk/Surrey%20Heath%20Borough%20Council/Planning%20Policy%20and%200Conservation/CDSHBC415aTransportAssessmentforM3Corridor.pdf>

be subject to HRA, **that the AAP incorporating the Main Modifications** will have no significant effect on the SAC either alone or in-combination with other plans and projects.

- 4.43 In terms of water quality, the Thames River Basin Management Plan shows Camberley Town Centre located within areas where the ecological quality of river water is 'moderate' as well as sitting atop a confined aquifer where infiltration of contaminants is unlikely.
- 4.44 Further, the topography of the Borough is such that Camberley Town Centre sits lower than the surrounding heathland areas and therefore likely flow directions from surface water run-off will be away from the SAC. As such, there are no downstream mechanisms for development at Camberley Town Centre to effect water quality at the SAC. As such, no pathways exist which, could lead to significant effects to the SAC.

Conclusion

- 4.45 On the basis of the objective information that is available at the time of writing this HRA, it can be concluded that the Camberley Town Centre AAP **incorporating the Main Modifications** would not have significant effects on the Thursley, Ash, Pirbright and Chobham Common SAC either alone or in-combination with other plans/projects.

5. Conclusion

- 5.1 The screening stage of this HRA was undertaken in sections 3 & 4 and has concluded that on the basis of the objective information available at the time of writing this HRA that the Camberley Town Centre AAP **incorporating the Main Modifications** will not give rise to significant effects on European designated sites either alone or in combination with other plans/projects.
- 5.2 As the screening sections have concluded 'no likely significant effect' it is considered that stage 2 of the HRA an 'appropriate assessment' is not required.

Appendix A

Main Modifications

| Ref | Page | Policy/ Paragraph | Main Modification |
|-----|------|----------------------------------|---|
| MM1 | 17 | TC1 | <i>Add new paragraph at the end of the policy:</i> <u>When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy framework (NPPF). With regard to residential provision within the town centre, development will be required to undertake appropriate assessment under the Birds or Habitat Directives to ensure that there is no significant adverse effect either individually or cumulatively on the Thames Basin Heaths Special Protection Area. This approach reflects advice in the NPPF.</u> |
| MM2 | 23 | 4.3 | <i>Add new paragraph at the end of the paragraph:</i> <u>To ensure that sufficient SANG capacity is available the Council is actively working with neighbouring authorities and with landowners within the Borough to bring forward SANG provision. This provision would provide avoidance measures that enable the western part of the Borough to bring forward residential development in line with the Council's spatial strategy, including that proposed in the AAP. These measures include provision of SANG at Swan Lakes in Yateley and use of SANG at Heather Farm in Woking.</u> |
| MM3 | 37 | 9.26 | <i>Delete the final sentence and add to the first sentence:</i> <u>and could provide circa 50 flats.</u> |
| MM4 | 55 | Appendix 2 | <i>Last sentence to read:</i> Comprehensive redevelopment to commence post <u>pre</u> 2020. |
| MM5 | 34 | TC14 | <i>Add new sentence immediately below (iii):</i> <u>A scheme for this site is expected to be delivering a high quality distinctive built form and as such it may be acceptable for it to depart from established building lines and heights.</u> |
| MM6 | 18 | Section 2 general Policies | <i>Add new paragraph 2.5 after policy TC1:</i> <u>Monitoring the policies within the Camberley Town Centre Area Action Plan (AAP) will be undertaken through the Council's Authority's Monitoring Report which is produced annually. The lead agencies in taking forward the AAP will be landowners, Surrey Heath Borough Council, Surrey County Council and Network Rail.</u> |



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