

Annex A: Provision for Gypsies and Travellers - Interim Statement

Extract from Draft South East Plan (Proposed Changes version, July 2008):

- 7.26 CLG Circular 01/2006 'Planning for Gypsy and Traveller Caravan Sites' sets out the policy and legislative framework for Government's aim of reducing tensions between Gypsies and Travellers and the settled community, through sustainable site provision and effective enforcement. The Circular requires regional spatial strategies, on the basis of local authority Gypsy and Traveller Accommodation Assessments, to determine a strategic view of needs across the region and identify the number of pitches required for each local planning authority. It also requires local authorities to allocate suitable sites within their Local Development Documents to meet the identified need set out in regional spatial strategies.
- 7.27 The Regional Planning Body is currently undertaking a single issue review of Gypsy and Traveller Accommodation needs in the region. As part of the review local authorities in the South East have now completed their Gypsy and Traveller Accommodation Assessments in accordance with the Housing Act 2004.
- 7.28 The accommodation assessments will provide for the first time comprehensive, robust and credible data relating to the needs and requirements of the Gypsy and Traveller Community.
- 7.29 Circular 01/2006 states that where there is a clear and immediate need, local planning authorities should bring forward Development Plan Documents containing site allocations in advance of regional consideration of pitch numbers, and completions of the Accommodation Assessments.

Annex B: Gypsy and Traveller residential pitch options 2006-2016

County grouping and Authority	Option A Need as arises	Option B Local sustainability	Option C 50% pooled	Option D 25% pooled
Berkshire	78	78	78	78
Buckinghamshire & Milton Keynes	113	113	122	117
East Sussex	47	47	59	53
Hampshire Isle of Wight	100	100	205	153
Kent	320	320	241	281
Oxfordshire	42	42	88	65
Surrey	163	163	118	140
West Sussex	201	201	153	177
SOUTH EAST	1,064	1,064	1,064	1,064
Bracknell Forest	6	17	14	16
Reading	7	6	9	7
Slough	17	6	7	7
West Berkshire	9	18	19	18
Windsor & Maidenhead	25	9	9	9
Wokingham	14	22	20	21
Berkshire	78	78	78	78
Aylesbury Vale	33	33	52	42
Chiltern	10	10	8	9
Milton Keynes	37	37	38	37
South Bucks	23	18	11	15
Wycombe	10	15	13	14
Buckinghamshire Milton Keynes	113	113	122	117
Brighton & Hove	14	11	15	13
Eastbourne	1	1	4	2
Hastings	3	1	4	3
Lewes	10	9	11	10
Rother	3	7	6	6
Wealden	16	18	19	19
East Sussex	47	47	59	53

County grouping and Authority	Option A Need as arises	Option B Local sustainability	Option C 50% pooled	Option D 25% pooled
Basingstoke & Deane	3	None provided	25	14
East Hampshire	0		16	8
Eastleigh	2		7	5
Fareham	2		7	4
Gosport	0		3	2
Hart	12		16	14
Havant	2		5	3
Isle of Wight	27		27	27
New Forest	5		8	6
Portsmouth City	8		10	9
Rushmoor	0		4	2
Southampton City	10		14	12
Test Valley	12		31	22
Winchester	17		32	25
Hampshire low	100	100	205	153
Ashford	20	32	28	30
Canterbury	32	33	26	30
Dartford	33	27	17	22
Dover	6	24	20	22
Gravesham	16	13	10	11
Maidstone	48	39	32	36
Medway	12	32	24	28
Sevenoaks	57	22	14	18
Shepway	2	13	9	12
Swale	64	31	20	25
Thanet	5	19	16	17
Tonbridge and Malling	14	20	14	17
Tunbridge Wells	11	15	11	13
Kent	320	320	241	281
Cherwell	11	8	25	16
Oxford City	0	8	9	8
South Oxfordshire	17	9	14	12
Vale of White Horse	1	8	19	14
West Oxfordshire	13	9	21	15
Oxfordshire	42	42	88	65

County grouping and Authority	Option A Need as arises	Option B Local sustainability	Option C 50% pooled	Option D 25% pooled
Elmbridge	9	13	11	12
Epsom & Ewell	7	6	7	7
Guildford	32	33	19	26
Mole Valley	7	6	6	6
Reigate & Banstead	4	8	8	8
Runnymede	18	11	8	9
Spelthorne	7	9	7	8
Surrey Heath	20	19	13	16
Tandridge	10	8	7	7
Waverley	39	39	23	31
Woking	10	11	9	10
Surrey	163	163	118	140
Adur	9	18	11	15
Arun	14	18	16	17
Chichester	65	65	38	51
Crawley	33	23	16	20
Horsham	59	56	47	51
Mid Sussex	21	21	21	21
Worthing	0	0	4	2
West Sussex	201	201	153	177

Notes

No Option B advice submitted for Hampshire authorities.

Buckinghamshire (excluding MK) G&T advice contained an arithmetic error, accepted by officers and corrected here, hence figures differ from formally agreed advice.

Isle of Wight held constant.

Oxfordshire Option B advice based on even provision rather than local sustainability considerations, and not agreed by Oxford City Council.

Annex C: Travelling Showpeople residential plot options 2006-2016

County grouping and Authority	Option A Need as arises	42 families Allocation by C/D approach	Option C 50% pooled plus share of 42	Option D 25% pooled plus share of 42
Berkshire	4	3	14	11
Buckinghamshire MK	21	5	31	28
East Sussex	0	3	11	7
Hampshire IoW	129	11	107	124
Kent	10	7	30	23
Oxfordshire	7	6	24	18
Surrey	58	3	40	51
West Sussex	5	4	19	14
SOUTH EAST	234	42	276	276
Bracknell Forest	1	0	2	2
Reading	1	0	2	2
Slough	0	1	1	1
West Berkshire	1	1	4	3
Windsor & Maidenhead	1	0	3	2
Wokingham	0	1	2	1
Berkshire	4	3	14	11
Aylesbury Vale	0	3	11	7
Chiltern	21	0	11	16
Milton Keynes	0	2	6	4
South Bucks	0	0	1	0
Wycombe	0	0	2	1
Buckinghamshire Milton Keynes	21	5	31	28
Brighton & Hove	0	1	3	2
Eastbourne	0	0	1	1
Hastings	0	0	1	1
Lewes	0	1	2	1
Rother	0	0	1	0
Wealden	0	1	3	2
East Sussex	0	3	11	7

County grouping and Authority	Option A Need as arises	42 families Allocation by C/D approach	Option C 50% pooled plus share of 42	Option D 25% pooled plus share of 42
Basingstoke & Deane	21	2	18	20
East Hampshire	14	1	12	14
Eastleigh	6	1	5	6
Fareham	5	1	4	5
Gosport	3	0	3	3
Hart	9	1	8	9
Havant	4	0	3	4
Isle of Wight	0	0	0	0
New Forest	5	0	4	5
Portsmouth City	5	0	4	5
Rushmoor	4	0	3	4
Southampton City	8	1	7	8
Test Valley	23	2	18	21
Winchester	22	2	18	20
Hampshire loW	129	11	107	124
Ashford	0	1	4	2
Canterbury	2	1	4	3
Dartford	7	0	5	5
Dover	0	1	3	2
Gravesham	0	0	1	1
Maidstone	0	1	4	2
Medway	0	1	2	1
Sevenoaks	0	0	1	1
Shepway	0	0	1	1
Swale	0	0	1	1
Thanet	1	1	2	2
Tonbridge & Malling	0	1	1	1
Tunbridge Wells	0	0	1	1
Kent	10	7	30	23
Cherwell	2	2	8	5
Oxford City	0	0	1	1
South Oxfordshire	3	2	4	4
Vale of White Horse	0	1	5	3
West Oxfordshire	2	1	6	5
Oxfordshire	7	6	24	18

County grouping and Authority	Option A Need as arises	42 families Allocation by C/D approach	Option C 50% pooled plus share of 42	Option D 25% pooled plus share of 42
Elmbridge	2	1	2	2
Epsom & Ewell	1	0	2	1
Guildford	15	1	9	12
Mole Valley	0	0	1	1
Reigate & Banstead	4	1	3	4
Runnymede	13	0	7	10
Spelthorne	7	0	4	6
Surrey Heath	10	0	6	8
Tandridge	4	0	3	4
Waverley	2	0	2	2
Woking	0	0	1	1
Surrey	58	3	40	51
Adur	0	0	1	0
Arun	1	1	3	2
Chichester	1	0	2	2
Crawley	0	0	1	1
Horsham	3	2	8	6
Mid Sussex	0	1	3	2
Worthing	0	0	1	1
West Sussex	5	4	19	14

Notes

Option B advice was not sought for Travelling Showpeople.

Option A figures in italics: 2011 advice extrapolated by the Assembly secretariat to 2016 at 1.5% growth net of turnover (agreed with the Showmen's Guild for this time period).

Option A figures underlined: The RSS is required to provide district-level figures. The Assembly secretariat has generated a default district distribution as none provided, using Option C/D approach (Hampshire group authorities).

September 2008

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APPENDIX 'E'

Dear Sir/Madam

**PARTIAL REVIEW OF THE DRAFT SOUTH EAST PLAN: GYPSY & TRAVELLER
ACCOMMODATION NEEDS**

I refer to the recent consultation material distributed regarding the above and write to provide a formal response on behalf of Runnymede Borough Council.

Copies of the consultation material were provided to Members the Housing & Community Services Committee and the Planning Committee during their meetings in September. Our Committees have approved the reply given on the attached standard response form however they also wish to make the following comments regarding the two main consultation issues and the sustainability appraisal.

Consultation Issue 1 - The proposed number of new spaces for gypsies, travellers and travelling showpeople in the South East.

It is felt that the assessment undertaken has been thorough, having taken account of both the backlog of need and future need. It is also felt that to plan to meet all of the need identified across the South East is commendable but the point must be made that this is at odds with the approach taken for affordable housing where, because of a number of issues, it is only currently possible to meet a small proportion and the most acute needs.

Consultation Issue 2 - The number of spaces that should be provided in each council area: views on four possible options for allocating spaces.

It is the view of both Committees that option C should be adopted as the way of determining the number of spaces to be provided by each council area. In arriving at this our Committees have taken into account the following factors:

- a) DCLG guidance¹ states that the strategic assessment "provides an opportunity to provide a wider spread of authorised site provision" and that "one of the likely tasks of the Regional Planning Body

¹ Preparing Regional Spatial Strategy reviews on Gypsy and Travelers by Regional Planning Bodies DCLG March 2007

when making pitch allocations is to consider a more even distribution of provision to enhance equity and choice”.

- b) There are currently several examples where adjoining authorities in the same County have extremely different levels of provision. Some have none at all. It is inconceivable that needs cannot be satisfied in these areas. Again we would point to Government advice² which made it clear that “Councils that have already made site provision are entitled to expect that, in this shared responsibility, every authority – and particularly that that neighbour high concentrations of gypsy and travellers – should make a contribution to future site provision”
- c) The Gypsy and Traveller Needs Assessment undertaken for the North Surrey Area³ made it clear that the gypsies and travellers interviewed for the survey had indicated no specific geographical location and simply wanted “more sites anywhere”⁴.
- d) Options A and B are based on meeting need within a GTAA area and follows existing population concentrations. In the North Surrey case the GTAA was undertaken for a very small geographic area which was not strategically determined. It should not therefore form the basis of distribution.
- e) Options A and B also have no regard to the intensification of provision and the sustainability of this approach. This point is expanded below.

Sustainability Appraisal

It is the Councils view that the Sustainability Appraisal (SA) undertaken for the Review has taken a subjective view of the options A-D. The emphasis of the appraisal has been to take option A as the baseline and then to assess how the other options compare with this option. This is fundamentally flawed in that each option should be assessed on its own merit. There is some doubt that the conclusion of the SA in favour of option A can therefore be considered as satisfying the statutory requirements set out in the Planning and Compulsory Purchase Act 2004 and the Strategic Environmental Assessment Directive 2005.

Of particular concern is the premise that option A is the preferred option that gypsy and traveller needs should be met where the need exists. This is contrary to the views mentioned above of individuals interviewed for the North West Surrey survey who, not surprisingly, by the very nature of their nomadic lifestyle, indicated that they were happy to have their need met generally rather than solely in the area where they were currently located.

Meeting needs in current locations may also not be sustainable for a range of reasons such as limited and competing employment opportunities and strained existing resource/ support networks. Unless these issues are considered it is not felt that a true SA has been undertaken.

Runnymede is a Borough that is subject to a number of development constraints such as, flooding, Thames Basin Heath SPA, and green belt. These limit the options for additional site provision and should be considered as part of the SA.

The SA should also have regard to the impact of provision on other plans, one of which would be the Regional Housing Strategy which acknowledges the rapidly growing demand for affordable housing. Pitch provision for gypsies and travellers, although acknowledged as a need, would directly compete with the supply of affordable housing. A continuing supply of affordable housing is necessary if homelessness

² Preparing Regional Spatial Strategy reviews on Gypsy and Travelers by Regional Planning Bodies DCLG March 2007

³ North Surrey GTAA Dr Home from Anglia Ruskin University April 2007

⁴ Paragraph 3.7.3 of GTAA

is to be reduced. The impact of site provision on opportunities to assist vulnerable homeless people also living in unsatisfactory housing should therefore be considered as part of the SA.

Conclusions

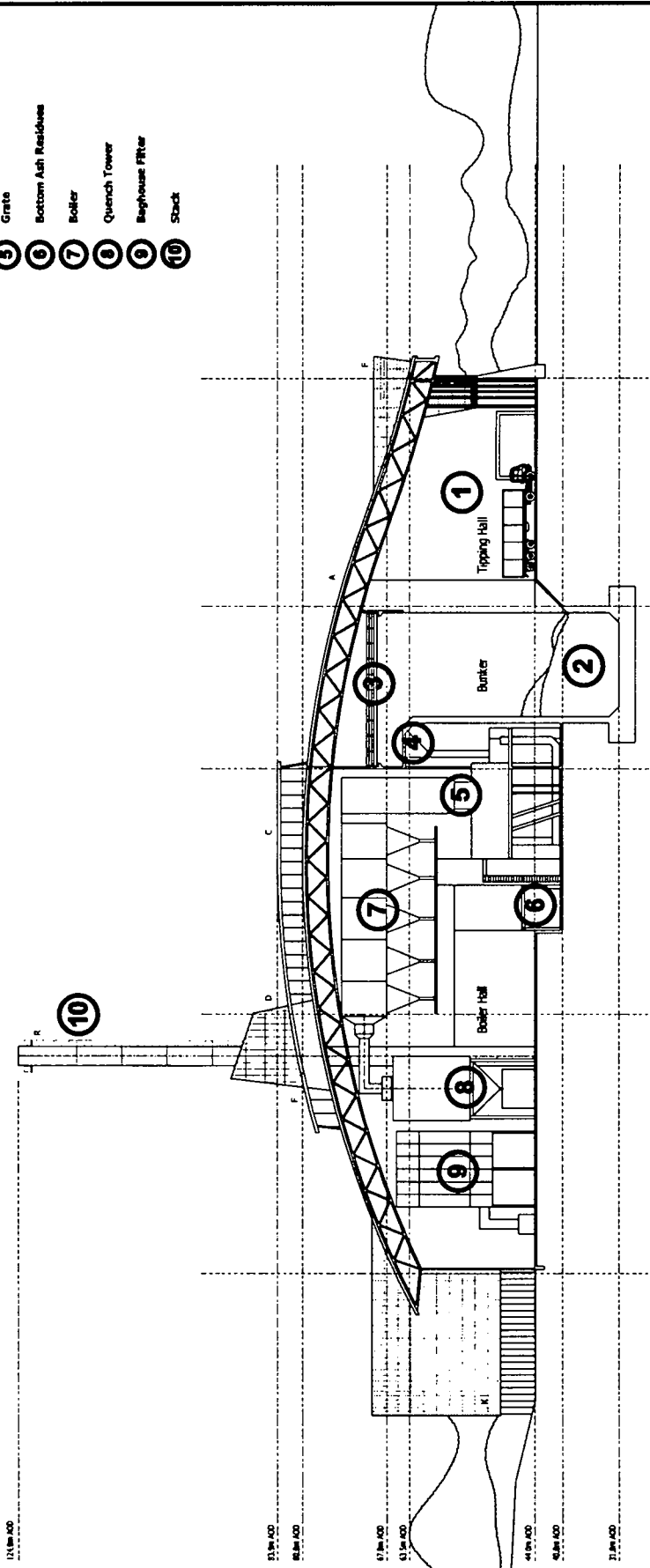
In conclusion the Council acknowledges the need to increase provision for gypsies, travellers and travelling show people. It has already enabled a significant number of sites to be provided within the Borough and is committed to making some further provision. It is however of the view that the identified need for the South East should be met through an option C approach which achieves a wider distribution and greater equity and choice.

Yours sincerely

Deborah Blowers Director of Housing and Community Services
On behalf of Runnymede Borough Council

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- ① Waste Reception and Tipping Hall
- ② Waste Storage Bunker
- ③ Crane
- ④ Feed Hopper
- ⑤ Grate
- ⑥ Bottom Ash Residue
- ⑦ Boiler
- ⑧ Quench Tower
- ⑨ Baghouse Filter
- ⑩ Stack



TRUMPS FARM,
SURREY

FIGURE 5.6 - Diagrammatic
Section through Typical Plant

Drawn by
03.02.08 MTS GS
14669 P24 A

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ES Review of Trumps Farm P20.35.001

Detailed Review Report

Assessment Grade	Numeric equivalent	Review Grading Criteria
A	1	Relevant tasks well performed, no important tasks left incomplete.
A/B	2	Undecided
B	3	Generally satisfactory and complete, only minor omissions and inadequacies.
B/C	4	Undecided
C	5	Can be considered just satisfactory despite omissions and/or inadequacies.
C/D	6	Undecided
D	7	Parts are well attempted but must, as a whole, be considered just unsatisfactory because of omissions and/or inadequacies.
D/E	8	Undecided
E	9	Not satisfactory, significant omissions or inadequacies.
E/F	10	Undecided
F	11	Very unsatisfactory, important task(s) poorly done or not attempted
NA	12	Not applicable in the context of the ES or the project

Section: DESCRIPTION OF THE DEVELOPMENT

1.1	Explains the purpose(s) and objectives of the development.		B
1.2	Indicates the nature and status of the decision(s) for which the environmental information has been prepared.		B
1.3	Gives the estimated duration of the construction, operational and where appropriate, decommissioning phase, and the programme within these phases.		C
1.4	Provides a description of the development comprising information on the site, design and size of the development.		B
1.5	Provides diagrams, plans or maps and photographs to aid the description of the development.		B
1.6	Indicates the physical presence or appearance of the completed development within the receiving environment.		B
1.7	Describes the methods of construction.	Not found in ES	F
1.8	Describes the nature and methods of production or other types of activity involved in the operation of the project.		B
1.9	Describes any additional services (water, electricity, emergency services etc.) and developments required as a consequence of the project.	Discussed at minor level not in detail	D
1.10	Describes the project's potential for accidents, hazards and emergencies.	Some areas discuss accidents although not in substantial detail. No apparent assessment of accident, hazard or emergency in respect of N2K features.	F
1.11	Defines the land area taken up by the development and/or construction site and any associated arrangements, auxiliary facilities and landscaping areas, and shows their location clearly on a map. For a linear project, describes the land corridor, vertical and horizontal alignment and need for tunnelling and earthworks.		B/C
1.12	Describes the uses to which this land will be put, and demarcates the different land use areas.	Not divided into different land use areas	B
1.13	Describes the reinstatement and after-use of land take during construction.		NA
1.14	Describes the nature and quantities of materials needed during the construction and operational phases.	Not found in ES	F
1.15	Estimates the number of workers and visitors entering the project site during both construction and operation.		A/B
1.16	Describes their access to the site and likely means of transport.	The peer review of the transportation chapter identified significant omissions.	F
1.17	Indicates the means of transporting materials and products to and from the site during construction and operation, and the number of movements involved.	TIA Peer Review ID a number of outstanding issue related to transport.	D

1.18	Estimates the types and quantities of waste matter, energy (noise, vibration, light, heat, radiation etc.) and residual materials generated during construction and operation of the project, and rate at which these will be produced	Waste covered	C/D
1.19	Indicates how these wastes and residual materials are expected to be handled/treated prior to release/disposal, and the routes by which they will eventually be disposed of to the environment		C
1.20	Identifies any special or hazardous wastes (defined as . . .) which will be produced, and describes the methods for their disposal as regards their likely main environmental impacts.		B/C
1.21	Indicates the methods by which the quantities of residuals and wastes were estimated. Acknowledges any uncertainty, and gives ranges or confidence limits where appropriate.	Not found in ES	F

Average Numeric Grade: **3** Average Grade: **B**

Section: DESCRIPTION OF THE ENVIRONMENT

2.1	Indicates the area expected to be significantly affected by the various aspects of the project with the aid of suitable maps. Explains the time over which these impacts are likely to occur.		C/D
2.2	Describes the land uses on the site(s) and in surrounding areas.		C
2.3	Defines the affected environment broadly enough to include any potentially significant effects occurring away from the immediate areas of construction and operation. These may be caused by, for example, the dispersion of pollutants, infrastructural requirements of the project, traffic etc.	Authors failed to consider AQ impacts on TAPC SAC, relying instead upon untested guidance.	F
2.4	Identifies and describes the components of the affected environment potentially affected by the project.	Authors failed to consider AQ impacts on TAPC SAC, relying instead upon untested guidance.	F
2.5	The methods used to investigate the affected environment are appropriate to the size and complexity of the assessment task. Uncertainty is indicated.	In general, it could be argued that the authors have met this test. However, given the fact that they failed to adequately consider AQ impacts on TAPC SAC, relying instead upon untested guidance, this test can not be met.	E
2.6	Predicts the likely future environmental conditions in the absence of the project. Identifies variability in natural systems and human use.	Failed to adequately consider AQ impacts on TAPC SAC prevents failure to consider future environmental conditions in absence of this project - this test has not been met.	F
2.7	Uses existing technical data sources, including records and studies carried out for environmental agencies and for special interest groups.	The authors have relied upon EA Guidance to determine a de minimus effect and thus to a greater extent than which the guidance is capable of supporting.	F
2.8	Reviews local, regional and national plans and policies, and other data collected as necessary to predict future environmental conditions. Where the proposal does not conform to these plans and policies, the departure is justified.	Where departure would be fully justified, the authors have chosen not to depart.	D
2.9	Local, regional and national agencies holding information on baseline environmental conditions have been approached.	One would have expected the CEH to have been approached in this instance.	D

Average Numeric Grade: **6** Average Grade: **C/D**

Section: SCOPING, CONSULTATION, AND IMPACT IDENTIFICATION

3.1	There has been a genuine attempt to contact the general public, relevant public agencies, relevant experts and special interest groups to appraise them of the project and its implication. Lists the groups approached.		B/C
3.2	Statutory consultees have been contacted. Lists the consultees approached.		B
3.3	Identifies valued environmental attributes on the basis of this consultation.		B
3.4	Identifies all project activities with significant impacts on valued environmental attributes. Identifies and selects key impacts for more intense investigation. Describes and justifies the scoping methods used.	the key issues relate to. AQ on human and ecosystem receptors, transportation, landscape and visual impacts. These have not been fully assessed.	D
3.5	Includes a copy or summary of the main comments from consultees and the public, and measures taken to respond to these comments.		B/C
3.6	Provides the data required to identify the main effects which the development is likely to have on the environment .	The ES fails to provide the data that would be required in order to identify the main effects the proposal will have on TAPC SAC. In addition, AQ on human receptors, transportation, landscape and visual impacts require additional data.	E/F
3.7	Considers direct and indirect/secondary effects of constructing, operating and, where relevant, after-use or decommissioning of the project (including positive and negative effects). Considers whether effects will arise as a result of "consequential" development.	ES fails to consider developments effects on TAPC SAC given the fact that it concludes NLSE. In addition, omissions in respect of AQ impacts on human receptors, transportation omissions, and landscape and visual impacts can not be adequately considered as being indirectly/secondary assessed.	F
3.8	Investigates the above types of impacts in so far as they affect: human beings, flora, fauna, soil, water, air, climate, landscape, interactions between the above, material assets, cultural heritage.	ES fails to consider developments effects on TAPC SAC given the fact that it concludes NLSE. In addition AQ on human receptors, transportation impacts, and landscape and visual impacts, all require additional information.	E
3.9	Also noise, land use, historic heritage, communities.		B/C
3.10	If any of the above are not of concern in relation to the specific project and its location, this is clearly stated.		NA
3.11	Identifies impacts using a systematic methodology such as project specific checklists, matrices, panels of experts, extensive consultations, etc. Describes the methods/approaches used and the rationale for using them.		C
3.12	The investigation of each type of impact is appropriate to its importance for the decision, avoiding unnecessary information and concentrating on the key issues.	A number of impacts have been investigated, however the importance of the impacts this development will have on the TAPC SAC has not been appropriate. Neither is AQ impacts on human receptors, transportation, landscape and visual impacts.	E
3.13	Considers impacts which may not themselves be significant but which may contribute incrementally to a significant effect.	Explicitly fails this test due to reliance on untested guidance.	F
3.14	Considers impacts which might arise from non-standard operating conditions, accidents and emergencies.	Not found in ES	F

3 15 If the nature of the project is such that accidents are possible which might cause severe damage within the surrounding environment, an assessment of the probability and likely consequences of such events is carried out and the main findings reported. · Could not find any risk assessment covering operational accidents. **F**

Average Numeric Grade: **4** Average Grade: **B/C**

Section: PREDICTION AND EVALUATION OF IMPACTS

4.1	Describes impacts in terms of the nature and magnitude of the change occurring and the nature, location, number, value, sensitivity of the affected receptors.	ES fails to take account of the sensitivity of the TAPC SAC to the affects of atmospheric pollution. It therefore fails this test.	F
4.2	Predicts the timescale over which the effects will occur, so that it is clear whether impacts are short, medium or long term, temporary or permanent, reversible or irreversible	ES fails to take account of the sensitivity of the TAPC SAC to the affects of atmospheric pollution. It therefore fails this test.	F
4.3	Where possible, expresses impact predictions in quantitative terms. Qualitative descriptions, where necessary, are as fully defined as possible.		B/C
4.4	Describes the likelihood of impacts occurring, and the level of uncertainty attached to the results.	Likelihood of impacts occurring covered , level of uncertainty in results not included.	D
4.5	Provides the data required to assess the main effects which the development is likely to have on the environment .	The ES fails to provide sufficient data with which to support its determination of NLSE on TAPC SAC. Neither is data for AQ impacts on human receptors, transportation, landscape and visual impacts fully provided.	D
4.6	The methods used to predict the nature, size and scale of impacts are described, and are appropriate to the size and importance of the projected disturbance.	Explicitly fails this test due to reliance on untested guidance.	E
4.7	The data used to estimate the size and scale of the main impacts are sufficient for the task, clearly described, and their sources clearly identified. Any gaps in the data are indicated and accounted for.	There are significant gaps in the data see: AQA peer Review, Transportation Peer Review and LVIA Peer Review.	E
4.8	Discusses the significance of effects in terms of the impact on the local community (including distribution of impacts) and on the protection of environmental resources.	Did not discuss due to a 'no likely significant effect' conclusion.	E
4.9	Discusses the available standards, assumptions and value systems which can be used to assess significance.	Fails to question guidance on which key assumptions are based.	D
4.10	Where there are no generally accepted standards or criteria for the evaluation of significance, alternative approaches are discussed and' if so, a clear distinction is made between fact, assumption and professional judgment.		C
4.11	Discusses the significance of effects taking into account the appropriate national and international standards or norms, where these are available. Otherwise the magnitude, location and duration of the effects are discussed in conjunction with the value, sensitivity and rarity of the resource.	EC standards used however, standards on impacts to human receptors and environmental receptors not clearly segregated.	D/E
4.12	Differentiates project-generated impacts from other changes resulting from non-project activities and variables.	Fundamental conclusion flawed.	F
4.13	Includes a clear indication of which impacts may be significant and which may not and provides justification for this distinction.	Fails to justify.	E

Average Numeric Grade: **11** Average Grade: **F**

Section: ALTERNATIVES

5.1	Provides an outline of the main alternatives studied and gives an indication of the main reasons for their choice, taking into account the environmental effects .	Alternative site and technology assessment partially considered however considerable reliance on historic assessments.	C/D
5.2	Considers the "no action" alternative, alternative processes, scales, layouts, designs and operating conditions where available at an early stage of project planning, and investigates their main environmental advantages and disadvantages.		A/B
5.3	If unexpectedly severe adverse impacts are identified during the course of the investigation, which are difficult to mitigate, alternatives rejected in the earlier planning phases are re-appraised.	Once unexpectedly severe adverse impacts identified, assumptions were relaxed, changed and modified, specifically AQA.	D
5.4	The alternatives are realistic and genuine.	Given the fact that the ES fails to provide adequate data to assess the impacts and conclusions, it is difficult to accept that this test has been successfully passed.	E
5.5	Compares the alternatives' main environmental impacts clearly and objectively with those of the proposed project and with the likely future environmental conditions without the project.	See 5.4	E

Average Numeric Grade:

6

Average Grade:

C/D

Section: MITIGATION AND MONITORING

6.1	Provides a description of the measures envisaged in order to avoid, reduce and, if possible, remedy significant adverse effects.	This test could only be passed in the all significant adverse effects were identified and adequately assessed. Failure to acknowledge the LSE on TAPC SAC leads to a failure of this test.	F
6.2	Mitigation measures considered include modification of project design, construction and operation, the replacement of facilities/ resources, and the creation of new resources, as well as 'end-of-pipe' technologies for pollution control.		C
6.3	Describes the reasons for choosing the particular type of mitigation, and the other options available.	Not found in ES	F
6.4	Explains the extent to which the mitigation methods will be effective. Where the effectiveness is uncertain, or where mitigation may not work, this is made clear and data are introduced to justify the acceptance of these assumptions.		C
6.5	Indicates the significance of any residual or unmitigated impacts remaining after mitigation, and justifies why these impacts should not be mitigated.	Not found in ES	NA
6.6	Gives details of how the mitigation measures will be implemented and function over the time span for which they are necessary.	Process of mitigation measures discussed but not timescale	D
6.7	Proposes monitoring arrangements for all significant impacts, especially where uncertainty exists, to check the environmental impact resulting from the implementation of the project and its conformity with the predictions made.	Not discussed in detail	D
6.8	The scale of any proposed monitoring arrangements corresponds to the potential scale and significance of deviations from expected impacts.	Not included in any detail in ES	D
6.9	Investigates and describes any adverse environmental effects of mitigation measures.	Not found in ES	F
6.10	Considers the potential for conflict between the benefits of mitigation measures and their adverse impacts.	Not found in ES	F

Average Numeric Grade: **11** Average Grade: **F**

Section: NON-TECHNICAL SUMMARY

7.1	There is a non-technical summary of the information provided under paragraphs 1 to 4 of Part 2 of Schedule 4 .	A/B
7.2	The non-technical summary contains at least a brief description of the project and the environment, an account of the main mitigation measures to be undertaken by the developer, and a description of any remaining or residual impacts	A
7.3	The summary avoids technical terms, lists of data and detailed explanations of scientific reasoning.	A/B
7.4	The summary presents the main findings of the assessment and covers all the main issues raised in the information.	B
7.5	The summary includes a brief explanation of the overall approach to the assessment.	A/B
7.6	The summary indicates the confidence which can be placed in the results.	C

Average Numeric Grade: **2** Average Grade: **A/B**

Section: ORGANISATION AND PRESENTATION OF INFORMATION

8.1	Logically arranges the information in sections.		B
8.2	Identifies the location of information in a table or list of contents.		A/B
8.3	There are chapter or section summaries outlining the main findings of each phase of the investigation.		B
8.4	When information from external sources has been introduced, a full reference to the source is included.		A/B
8.5	Mentions the relevant EIA legislation, name of the developer, name of competent authority(ies), name of organisation preparing the ES, and name, address and contact number of a contact person.		A
8.6	Includes an introduction briefly describing the project, the aims of the assessment, and the methods used.		A
8.7	The statement is presented as an integrated whole. Data presented in appendices are fully discussed in the main body of the text.		B
8.8	Offers information and analysis to support all conclusions drawn.		B
8.9	Presents information so as to be comprehensible to the non specialist. Uses maps, tables, graphical material and other devices as appropriate. Avoids unnecessarily technical or obscure language.	Some information related to AQ impacts is presented in a manner that could lead the non specialist to an incorrect conclusion, specifically in respect of impacts on ecosystems.	D
8.10	Discusses all the important data and results in an integrated fashion.		B
8.11	Avoids superfluous information (i.e. information not needed for the decision).		B/C
8.12	Presents the information in a concise form with a consistent terminology and logical links between different sections.		B
8.13	Gives prominence and emphasis to severe adverse impacts, substantial environmental benefits, and controversial issues.	Could be considered as to play down impacts on the TAPC SAC.	F
8.14	Defines technical terms, acronyms and initials.		B
8.15	The information is objective, and does not lobby for any particular point of view. Adverse impacts are not disguised by euphemisms or platitudes.		B
8.16	Indicates any gaps in the required data and explains the means used to deal with them in the assessment.	Not found in ES	F
8.17	Acknowledges and explains any difficulties in assembling or analysing the data needed to predict impacts, and any basis for questioning assumptions, data or information.	Not covered in ES	F

Average Numeric Grade: **3** Average Grade: **B**

IA Ref: P20.35.001

Collation Sheet for ES in support of planning application

**THE IMPACT ASSESSMENT UNIT AT OXFORD BROOKS
UNIVERSITY^[1] BEST PRACTICE REQUIREMENTS FOR MEETING
PART 2 SCHEDULE 4 OF THE TOWN AND COUNTRY PLANNING
(ENVIRONMENT IMPACT ASSESSMENT) (ENGLAND AND WALES)
REGULATION 1999 (SI 1999 NO293)**

Criterion	Overall Grade	Areas where more information is
Description of the development (1.1 - 1.21)	B	
Description of the environment (2.1 - 2.9)	C/D	
Scoping, consultation, and impact identification (3.1 - 3.15)	B/C	
Prediction and evaluation of impacts (4.1 - 4.13)	F	
Alternatives (5.1 - 5.5)	C/D	
Mitigation and Monitoring (6.1 - 6.10)	F	
Non-technical Summary (7.1 - 7.6)	A/B	
Organisation and Presentation of Information (8.1 - 8.17)	B	
Overall Grade (A-F):	C/D [prov]	

Comments:

Collation Sheet for ES Review: P20.35.001

MINIMUM REQUIREMENTS FOR PART 2 SCHEDULE 4 OF THE TOWN AND COUNTRY PLANNING (ENVIRONMENT IMPACT ASSESSMENT) (ENGLAND AND WALES) REGULATION 1999 (SI 1999 NO293)

Criterion	Overall Grade	Areas where more information is
1) A description of the development comprising information on the site, design and size of the development (see 1.4)	B	
2) Provides the data required to identify the main effects which the development is likely on have on the environment (see 3.6)	E/F	
3) Provides the data required to assess the main effects which the development is likely on have on the environment (see 4.5)	D	
4) Provides an outline of the main alternatives studied and an indication of the main reasons for their choice, taking into account the environmental effects. (see 5.1)	C/D	
5) Provides a description of the measures envisaged in order to avoid, reduce and, if possible, remedy significant adverse effects (see 6.1)	F	
6) There is a non-technical summary of the information provided under paragraphs 1 to 4 of Part 2 of Schedule 4 (see 7.1)	A/B	
Overall Grade =	Fail	

Comments:

ES Review of Trumps Farm P20.35.001

Draft Completeness Report

Assessment Grade	Numeric equivalent	Review Grading Criteria
A	1	Relevant tasks well performed, no important tasks left incomplete.
A/B	2	Undecided
B	3	Generally satisfactory and complete, only minor omissions and inadequacies.
B/C	4	Undecided
C	5	Can be considered just satisfactory despite omissions and/or inadequacies.
C/D	6	Undecided
D	7	Parts are well attempted but must, as a whole, be considered just unsatisfactory because of omissions and/or inadequacies.
D/E	8	Undecided
E	9	Not satisfactory, significant omissions or inadequacies.
E/F	10	Undecided
F	11	Very unsatisfactory, important task(s) poorly done or not attempted
NA	12	Not applicable in the context of the ES or the project

Section: DESCRIPTION OF THE DEVELOPMENT

1.3	Gives the estimated duration of the construction, operational and where appropriate, decommissioning phase, and the programme within these phases.	Not found in ES	F
1.7	Describes the methods of construction.	Not found in ES	F
1.9	Describes any additional services (water, electricity, emergency services etc.) and developments required as a consequence of the project.	Discussed at minor level not in detail	D
1.10	Describes the project's potential for accidents, hazards and emergencies.	Some areas discuss accidents although not in substantial detail	D
1.12	Describes the uses to which this land will be put, and demarcates the different land use areas.	Not divided into different land use areas	D
1.13	Describes the reinstatement and after-use of land take during construction.	Not found in ES	F
1.14	Describes the nature and quantities of materials needed during the construction and operational phases.	Not found in ES	F
1.16	Describes their access to the site and likely means of transport.	Not found in ES	F
1.18	Estimates the types and quantities of waste matter, energy (noise, vibration, light, heat, radiation etc.) and residual materials generated during construction and operation of the project, and rate at which these will be produced.	Waste covered	D
1.21	Indicates the methods by which the quantities of residuals and wastes were estimated. Acknowledges any uncertainty, and gives ranges or confidence limits where appropriate.	Not found in ES	F

Section: DESCRIPTION OF THE ENVIRONMENT

2.6	Predicts the likely future environmental conditions in the absence of the project. Identifies variability in natural systems and human use.	Not explained in line with review criteria	D
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Section: SCOPING, CONSULTATION, AND IMPACT IDENTIFICATION

3.7	Considers direct and indirect/secondary effects of constructing, operating and, where relevant, after-use or decommissioning of the project (including positive and negative effects). Considers whether effects will arise as a result of "consequential" development.	Not found in ES	F
3.10	If any of the above are not of concern in relation to the specific project and its location, this is clearly stated.	Not found in ES	F
3.13	Considers impacts which may not themselves be significant but which may contribute incrementally to a significant effect.	Not found in ES	F
3.14	Considers impacts which might arise from non-standard operating conditions, accidents and emergencies.	Not found in ES	F

Section: PREDICTION AND EVALUATION OF IMPACTS

4.4	Describes the likelihood of impacts occurring, and the level of uncertainty attached to the results.	Likelihood of impacts occurring covered, level of uncertainty in results not included.	D
4.7	The data used to estimate the size and scale of the main impacts are sufficient for the task, clearly described, and their sources clearly identified. Any gaps in the data are indicated and accounted for.	Data gaps not indicated	D
4.12	Differentiates project-generated impacts from other changes resulting from non-project activities and variables	Not found in ES	F

Section: ALTERNATIVES

5.5	Compares the alternatives' main environmental impacts clearly and objectively with those of the proposed project and with the likely future environmental conditions without the project.	Not found in ES	F
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Section: MITIGATION AND MONITORING

6.3	Describes the reasons for choosing the particular type of mitigation, and the other options available.	Not found in ES	F
6.5	Indicates the significance of any residual or unmitigated impacts remaining after mitigation, and justifies why these impacts should not be mitigated.	Not found in ES	F
6.6	Gives details of how the mitigation measures will be implemented and function over the time span for which they are necessary.	Process of mitigation measures discussed but not timescale	D
6.7	Proposes monitoring arrangements for all significant impacts, especially where uncertainty exists, to check the environmental impact resulting from the implementation of the project and its conformity with the predictions made.	Not discussed in detail	D
6.8	The scale of any proposed monitoring arrangements corresponds to the potential scale and significance of deviations from expected impacts.	Not included in any detail in ES	D
6.9	Investigates and describes any adverse environmental effects of mitigation measures.	Not found in ES	F
6.10	Considers the potential for conflict between the benefits of mitigation measures and their adverse impacts.	Not found in ES	F

Section: ORGANISATION AND PRESENTATION OF INFORMATION

8.2	Identifies the location of information in a table or list of contents.	Not found in ES	F
8.16	Indicates any gaps in the required data and explains the means used to deal with them in the assessment.	Not found in ES	F
8.17	Acknowledges and explains any difficulties in assembling or analysing the data needed to predict impacts, and any basis for questioning assumptions, data or information.	Not covered in ES	F

Regulation 48 (1) (a) [Shadow] Screening Opinion in
response to a consultation by SCC for a proposed EfW
Incinerator Facility to be located on Land at Trumps
Farm, Kitsmead Lane, Longcross, Surrey

The Conservation (Natural Habitats &c.) Regulations 1994 (as amended)

By:

**Runnymede Borough Council
Technical Services
Civic Centre
Station Road
Addlestone
Surrey KT15 2DZ**

Natura 2000 Site:

**Thursley, Ash, Pirbright and Chobham Special Area of
Conservation (SAC)**

Date:

05 September 2008

Status:

Shadow

Screening number:

P20.46.001

Application/Plan reference number(s) if applicable:

Runnymede Borough Council Application: RU.08/0673
Surrey County Council Application: 2008/0093/SJ

**[Shadow] Screening opinion for planning consultation RU.08/0673 in consideration of regulation 48 (1) of the Conservation (Natural Habitats, &c.) Regulations 1994 (as amended) on a Natura 2000 site – Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC)
HR94 Screening No: P20.46.001**

Introductory note

This introductory note does not form a part of this Screening Opinion.

The following shadow screening opinion (the "Opinion") is issued pursuant to Regulation 48 (1) (a) of The Conservation (Natural Habitats &c.) Regulation 1994 (as amended) (the "Regulations") to inform Surrey County Council, Secretary of State or other body acting as Competent Authority (CA) in the approval of the project described in Part 1 (the "Project") of this opinion.

The opinion comprises the following parts:

- Part 1 – Description of proposal;
- Part 2 – Description of designated site;
- Part 3 – Screening assessment criteria; and,
- Part 4 – Consideration.

A number of appendices have been attached to the end of this opinion and include:

- Appendix 1 – EC Directive 92/43 Site Citation;
- Appendix 2 – Designated Site Location Map;
- Appendix 3 – Designated Site – Feature Impact Identification;
- Appendix 4 – Project Relevancy Test; and,
- Appendix 5 – Statutory or Other Representations.

**[Shadow] Screening opinion for planning consultation RU.08/0673 in consideration of regulation 48 (1) of the Conservation (Natural Habitats, &c.) Regulations 1994 (as amended) on a Natura 2000 site – Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC)
HR94 Screening No: P20.46.001**

Part 1 - Description of proposal

(Plan data can be taken from the submitted consultation documents as detailed within RU.08/0673)

1.1 Location:	Runnymede Borough
1.2 Distance from designated site boundary to PP boundary:	1.4 Km
1.3 Site area (ha):	6.85 ha
1.4 Application Type:	Full
1.5 Application No:	RBC Ref: RU.08/0673 SCC Ref: 2008/0093/SJ
1.6 IA Screening No.	P20.46.001
1.7 Brief description of proposal:	The developers have submitted a planning application that seeks permission for the construction of a single stream Energy from Waste (EfW) incinerator plant, plus associated infrastructure and engineering works. The information submitted in support of this application includes an Environmental Statement that assessed a notional capacity for the proposed plant of up to 160,000 tonnes of residual waste per annum, generating up to 12MW of electricity for export to the National Grid. Access to the EfW plant would be from Kitsmead Lane making use of an existing track which would be improved as required. The proposal also includes new landscaped bunds what are intended to form part of the proposals to assist in mitigating the visual impact of the proposed plant buildings.
1.8 Total number of new and or additional residential units:	N/A
1.9 Brief description of manner in which PP is proposed to be carried out:	It is assumed that normal construction methods will be used in the construction of this facility and that the facility will operate at or near capacity under normal operational conditions during its design life.
1.10 Is the PP directly connected with or necessary to the site management for nature conservation?	*No (If yes proceed with normal authorisation process.)

**[Shadow] Screening opinion for planning consultation RU.08/0673 in consideration of regulation 48 (1) of the Conservation (Natural Habitats, &c.) Regulations 1994 (as amended) on a Natura 2000 site – Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC)
HR94 Screening No: P20.46.001**

Part 2 - Description of designated site ¹		
2.1 Name:	Thursley, Ash, Pirbright and Chobham	
2.2 Unitary Authority/Country:	Surrey	
2.3 Site designation Status:	Special Area of Conservation (SAC)	
2.4 Site description:	<p>The heathland is a series of large fragments of previously more continuous areas and is principally dominated by heather – dwarf gorse (<i>Calluna vulgaris</i> – <i>Ulex minor</i>) dry heathland. There are transitions to wet heath and valley mire, scrub, woodland and acid grassland, including types rich in annual plants. This habitat supports an important assemblage of animal species, including numerous rare and local invertebrate species, including the nationally rare white-faced darter <i>Leucorhina dubia</i>, as well as sand lizard <i>Lacerta agilis</i> and smooth snake <i>Coronella austriaca</i>.</p> <p>This site supports the sole area of lowland northern Atlantic wet heath in south-east England. The wet heath at Thursley is mainly cross-leaved heath – bog-moss (<i>Erica tetralix-Sphagnum compactum</i>) and contains several rare plants, including great sundew <i>Drosera anglica</i>, bog hair-grass <i>Deschampsia setacea</i>, bog orchid <i>Hammarbya paludosa</i> and brown beak-sedge <i>Rhynchospora fusca</i>.</p> <p>Depressions on peat substrates are widespread, both in bog pools, mires and in flushes where they occur as part of a mosaic associated with valley bog and wet heath. They show extensive representation of brown-beak sedge and are also important for great sundew and bog orchid <i>Hammarbya paludosa</i>.</p>	
2.5 Qualifying habitats/species:	Annex 1 Habitats	% cover
	Northern Atlantic wet heaths with <i>Erica tetralix</i> (Wet heathland with cross-leaved heath)	10
	European dry heaths	70
	Depressions on peat substrates of the <i>Rhynchosporion</i>	0.1
	Atlantic acidophilous beech forests with <i>Ilex</i> and sometimes also <i>Taxus</i> in the <i>shrublayer</i> (<i>Quercion roboret-raeae</i> or <i>Illici-Fagenion</i>)*	1
	Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (<i>Alno-Padion</i> , <i>Alnion incanae</i> , <i>Salicion albae</i>)*	1
	Annex II Species	Period
Great Crested Newt (<i>Triturus cristatus</i>)*		
2.3 Non-qualifying species of interest:		
2.4 Unit area (ha):	5138.00	
2.5 Condition	No Data – however ‘critical loads’ have already been exceeded in respect of both the Wet and Dry Heath features due to atmospheric deposition.	

¹ See Appendices 1 and 2
* non-significant presence

**[Shadow] Screening opinion for planning consultation RU.08/0673 in consideration of regulation 48 (1) of the Conservation (Natural Habitats, &c.) Regulations 1994 (as amended) on a Natura 2000 site – Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC)
HR94 Screening No: P20.46.001**

Part 3 – Screening assessment criteria

<p>3.1 Description of individual elements of the Project (either alone or in combination with other Plans or Projects) likely to give rise to impacts on the designated site</p>	<p>Policy (see Appendix 4 Project Relevance Test):</p>
<p>3.2 Describe any likely direct, indirect or secondary impacts of the plan (either alone or in combination with other PP's) on the designated site:</p> <ul style="list-style-type: none"> • Size and scale; • Land-take; • Distance from the designated site and key features of the site; • Resource requirements (water abstraction etc); • Emissions (disposal to land, water or air); • Excavation requirements; • Duration of construction, operation, decommissioning, etc.; • Other. 	<p>The plan promotes development of a type that will result in the production of addition atmospheric pollutants that will add to already elevated background levels. Whilst it is accepted that atmospheric pollution can be emitted from national as well as local point sources, it is diffuse pollution particularly from increased urbanisation and its supporting infrastructure such this proposed development including transportation that is likely to continue to result in the greatest effects on the habitats in question.</p> <p>The development as proposed will emit a number of pollutants including Oxides of Nitrogen (NO, No2, HONO), ammonia (NH3) Oxides of Carbon (CO, CO2), Sulphur dioxides (SO2), Volatile Organic compounds (VOCs) and particulates, as well as polycyclic aromatic hydrocarbons (PAHs).</p> <p>There is robust evidence to suggest that atmospheric pollution adversely affects the vegetation communities of lowland heathland including those features present within this SAC. Equally there is also clear evidence to suggest that the levels of atmospheric pollutants are sufficiently high to influence vegetation communities across this SAC.</p> <p>In addition to the cumulative affect in-combination emissions have on the designated features, an addition direct in-combination affect is experienced within 200m of road systems adjacent to and within the SAC.</p> <p>The evidence available suggests that the SAC is in unfavourable condition due to exceedences of atmospheric emissions. Whilst this could be as a result of a variety of historic reasons. It is nevertheless reasonably foreseeable that this development when taken in-combination with other relevant proposed development outlined within the SEP and other plans across the region will have the potential to increase vehicular traffic and non-vehicle emissions. Therefore, in combination this development has the potential to continue to contribute to the raising of background levels of atmospheric pollution.</p>

**[Shadow] Screening opinion for planning consultation RU.08/0673 in consideration of regulation 48 (1) of the Conservation (Natural Habitats, &c.) Regulations 1994 (as amended) on a Natura 2000 site – Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC)
HR94 Screening No: P20.46.001**

<p>3.3 Describe any likely changes to the site arising as a result of:</p> <ul style="list-style-type: none"> • Reduction of habitat area; • Disturbance to key species; • Habitat or species fragmentation; • Reduction in species density; • Changes in key indicators of conservation value (water quality etc.); • Climate change. 	<p>Atmospheric pollution particularly nitrogen deposition represents a threat to naturally nutrient-poor plant communities such as those found within this SAC. Nitrogen deposition contributes to acidification as well as nutrient enrichment, in turn this can result in an increased dominance of grasses (an effect which can be linked to both atmospheric pollution and habitat management)</p> <p>Within this habitat nitrogen deposition and subsequent availability is critically important since it is considered to be a limiting factor for plant and microbial growth in many natural and semi-natural ecosystems, with many plants only able to compete successfully in soils of low nitrogen status (Tamm, 1991).</p> <p>Elevated rates of nitrogen deposition have been linked to the conversion of heathlands to grasslands in the Netherlands, with the loss of more than 35% of areas formerly dominated by <i>Calluna vulgaris</i> (Van der Eerden <i>et al.</i>, 1991; Aerts, 1993; Bobbink & Heil, 1993; Berendse <i>et al.</i>, 1994).</p> <p>In a study on the effects of roads on dry heathlands of the New Forest (including the A31), Angold (1997, 2002) found a range of impacts of the presence of roads on the heathland vegetation including:</p> <ul style="list-style-type: none"> • Increased shoot growth and nitrogen content of heather close to roads; • Reduced cover of heather close to roads; • Increased growth of the grass <i>Molinia</i> and increased cover of all grass species including <i>Molinia</i>; and, • Decreased abundance of lichen cover close to roads. <p>These changes were related to distance from the road and attributed to changes in relative competitive ability. These impacts extended up to 200m from the road edges and were correlated with traffic density.</p> <p>These changes are consistent with experimental observations of the vegetative response to increased deposition of oxides of nitrogen on dry heathlands. Field manipulation experiments have demonstrated positive growth responses of <i>Calluna</i> to nitrogen additions over varying time scales (Uren <i>et al.</i>, 1997; Power <i>et al.</i>, 1998a; Carroll <i>et al.</i>, 1999). There is also evidence of responses which are associated with an increased sensitivity to biotic and abiotic stress, including increased foliar nitrogen content, unfavourable nutrient and root:shoot ratios, and increased winter injury (Power <i>et al.</i>, 1998b; Hartley & Amos, 1999; Carroll <i>et al.</i>, 1999). Furthermore, increases in the quantity and quality of plant material have been shown to result in an accumulation of nitrogen in plant, litter and soil components of heathlands experiencing elevated atmospheric inputs of this nutrient (Power <i>et al.</i>, 1998a)</p> <p>Chobham Common NNR/SSSI (which is part of Thursley, Ash, Pirbright and Chobham SAC) was used for an investigation into the response of <i>Calluna</i>-dominated heathland to nitrogen deposition and the links to management (Barker <i>et al</i> 2004). The Barker study found that seedling invasion and establishment by herbaceous species (including grasses) were higher for higher levels of nitrogen.</p>
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**[Shadow] Screening opinion for planning consultation RU.08/0673 in consideration of regulation 48 (1) of the Conservation (Natural Habitats, &c.) Regulations 1994 (as amended) on a Natura 2000 site – Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC)
HR94 Screening No: P20.46.001**

<p>3.4 Describe any likely impact on the designated site as a whole in terms of:</p> <ul style="list-style-type: none"> • Interference with the key relationships that define the structure of the site; • Interference with key relationships that define the function of the site. 	<p>Continued exposure to elevated levels of atmospheric pollution will eventually lead to a loss of the conservation value of importance for this statutory nature conservation site. The only issue of question is when will irreversible impacts occur?</p>
<p>3.5 Provide indicators of significance as a result of the identification of effects set out above in terms of:</p> <ul style="list-style-type: none"> • Loss; • Fragmentation; • Disruption; • Disturbance; • Change to key elements of the site (e.g. water quality etc.). 	<p>Assessments of these impacts have been focused on what is referred to as the "the critical loads approach", (see: http://www.jncc.gov.uk/page-2096)</p> <p>It is reasonable to conclude that should this effect continue, loss of habitat is inevitable due to changes outlined above.</p>
<p>3.6 Describe from 3.1 to 3.5 above those elements of the PP, or combination of elements, where the above impacts are likely to be significant or where the scale or magnitude of impacts if not known.</p>	<p>The project effects highlighted in 3.1 above are in combination with others likely to contribute to the impacts outlined in 3.2 - 3.5.</p> <p>The spatial scale of the specific project is county/regional, however the effect is described as national and the magnitude is potentially large but as yet not fully known.</p>

Part 4 – Consideration

On the bases of the information contained in Parts 1 to 3 and the supporting appendices including consultation with others it is the Council's opinion that the proposed project to which this screening opinion relates:

- (a) is likely to have a significant effect on this European site (alone and in combination with other plans or projects), and
- (b) is not directly connected with or necessary to the management of the site,

Accordingly, there is a statutory requirement for an "appropriate assessment" to be made of this application under Regulation 48, 49 and 54 of the Conservation (Natural Habitats, &c.) Regulations 1994 before any CA decides to undertake, or give any consent, permission or other authorisation for this project.

Dated:

Signed:

NATURA 2000

STANDARD DATA FORM

FOR SPECIAL PROTECTION AREAS (SPA)
 FOR SITES ELIGIBLE FOR IDENTIFICATION AS SITES OF COMMUNITY IMPORTANCE (SCI)
 AND
 FOR SPECIAL AREAS OF CONSERVATION (SAC)

1. Site identification:

1.1 Type 1.2 Site code

1.3 Compilation date 1.4 Update

1.5 Relationship with other Natura 2000 sites

1.6 Respondent(s)

1.7 Site name

1.8 Site indication and designation classification dates

date site proposed as eligible as SCI	199601
date confirmed as SCI	
date site classified as SPA	
date site designated as SAC	

2. Site location:

2.1 Site centre location

longitude	latitude
00 41 35 W	51 09 42 N

2.2 Site area (ha) 2.3 Site length (km)

2.5 Administrative region

NUTS code	Region name	% cover
UK532	Surrey	100.0%

2.6 Biogeographic region

Alpine
 Atlantic
 Boreal
 Continental
 Macaronesia
 Mediterranean

3. Ecological information:

3.1 Annex I habitats

Habitat types present on the site and the site assessment for them:

Annex I habitat	% cover	Representati vity	Relative surface	Conservation status	Global assessment
Northern Atlantic wet heaths with <i>Erica tetralix</i>	10	A	C	A	B
European dry heaths	70	A	C	A	B

Depressions on peat substrates of the <i>Rhynchosporion</i>	0.1	B	C	A	A
Atlantic acidophilous beech forests with <i>Ilex</i> and sometimes also <i>Taxus</i> in the shrublayer (<i>Quercion robori-petraeae</i> or <i>Ilici-Fagenion</i>)	1	D			
Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (<i>Alno-Padion</i> , <i>Alnion incanae</i> , <i>Salicion alvae</i>)	1	D			

3.2 Annex II species

Species name	Population				Site assessment			
	Resident	Migratory			Population	Conservation	Isolation	Global
		Breed	Winter	Stage				
<i>Triturus cristatus</i>	Present	-	-	-	D			

4. Site description

4.1 General site character

Habitat classes	% cover
Marine areas. Sea inlets	
Tidal rivers. Estuaries. Mud flats. Sand flats. Lagoons (including saltwork basins)	
Salt marshes. Salt pastures. Salt steppes	
Coastal sand dunes. Sand beaches. Machair	
Shingle. Sea cliffs. Islets	
Inland water bodies (standing water, running water)	5.0
Bogs. Marshes. Water fringed vegetation. Fens	10.0
Heath. Scrub. Maquis and garrigue. Phygrana	75.0
Dry grassland. Steppes	
Humid grassland. Mesophile grassland	
Alpine and sub-alpine grassland	
Improved grassland	
Other arable land	
Broad-leaved deciduous woodland	
Coniferous woodland	10.0
Mixed woodland	
Non-forest areas cultivated with woody plants (including orchards, groves, vineyards, dehesas)	
Inland rocks. Screes. Sands. Permanent snow and ice	
Other land (including towns, villages, roads, waste places, mines, industrial sites)	
Total habitat cover	100%

4.1 Other site characteristics

<p>Soil & geology: Acidic, Nutrient-poor, Peat, Sand</p> <p>Geomorphology & landscape: Lowland</p>
--

4.2 Quality and importance

<p>Northern Atlantic wet heaths with <i>Erica tetralix</i></p> <ul style="list-style-type: none"> for which this is considered to be one of the best areas in the United Kingdom. <p>European dry heaths</p> <ul style="list-style-type: none"> for which this is considered to be one of the best areas in the United Kingdom. <p>Depressions on peat substrates of the <i>Rhynchosporion</i></p> <ul style="list-style-type: none"> for which this is considered to be one of the best areas in the United Kingdom.
--

4.3 Vulnerability

The mosaic of habitats across this large and varied site is largely dependent on active heathland management. Insufficient grazing or other traditional practices, including bracken control and scrub clearance, is therefore a serious potential threat, as is lowering of water tables as a result of water abstraction or other reasons which could cause loss or damage to wet heath and mire communities. Grazing trials have been established on several parts of the site with great success, but currently extensive grazing is absent from much of the site. The indirect effects of neighbouring housing developments pose a potential long-term problem, but can probably be addressed through the planning system. Measures are also needed to address recreational pressures, including disturbance to wildlife and fires resulting from arson, which may pose a serious risk to habitats and some species. The Ministry of Defence is a major landowner/manager and, at present, uses much of its land for firing ranges and military exercises (largely by infantry). A Memorandum of Understanding exists between English Nature and the MoD through which the impact of military activities is regulated. The MoD have produced comprehensive Management Plans which recognise the outstanding nature conservation importance of their land.

5. Site protection status and relation with CORINE biotopes:

5.1 Designation types at national and regional level

Code	% cover
UK01 (NNR)	16.0
UK04 (SSSI/ASSI)	100.0

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

Citation for Special Area of Conservation (SAC)

Name: Thursley, Ash, Pirbright and Chobham
Unitary Authority/County: Surrey
SAC status: Designated on 1 April 2005
Grid reference: SU914411
SAC EU code: UK0012793
Area (ha): 5138.00
Component SSSI: Ash to Brookwood Heaths SSSI, Chobham Common SSSI,
Colony Bog and Bagshot Heath SSSI, Thursley, Hankley and
Frensham Commons SSSI

Site description:

The heathland is a series of large fragments of previously more continuous areas and is principally dominated by heather – dwarf gorse (*Calluna vulgaris* – *Ulex minor*) dry heathland. There are transitions to wet heath and valley mire, scrub, woodland and acid grassland, including types rich in annual plants. This habitat supports an important assemblage of animal species, including numerous rare and local invertebrate species, including the nationally rare white-faced darter *Leucorhinia dubia*, as well as sand lizard *Lacerta agilis* and smooth snake *Coronella austriaca*.

This site supports the sole area of lowland northern Atlantic wet heath in south-east England. The wet heath at Thursley is mainly cross-leaved heath – bog-moss (*Erica tetralix* – *Sphagnum compactum*) and contains several rare plants, including great sundew *Drosera anglica*, bog hair-grass *Deschampsia setacea*, bog orchid *Hammarbya paludosa* and brown beak-sedge *Rhynchospora fusca*.

Depressions on peat substrates are widespread, both in bog pools, mires and in flushes where they occur as part of a mosaic associated with valley bog and wet heath. They show extensive representation of brown-beak sedge and are also important for great sundew and bog orchid *Hammarbya paludosa*.

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:

- Depressions on peat substrates of the *Rhynchosporion*
- European dry heaths
- Northern Atlantic wet heaths with *Erica tetralix*. (Wet heathland with cross-leaved heath)

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

Register reference number: UK0012793

Date of registration: 14 June 2005

Signed: *Paul Selman*

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

Register of European sites

Register entry UK0012793 under Regulation 11 of the Conservation (Natural Habitats, &c.) Regulations 1994

This is the register entry for the European site known as **Thursley, Ash, Pirbright and Chobham** in the Region of Surrey. This area has been designated by the Secretary of State for Environment, Food and Rural Affairs pursuant to Article 4.4 of the "Habitats Directive" (Council Directive 92/43/EEC) as a Special Area of Conservation. The register reference number for this European site is UK0012793 and a folder, kept under this reference as part of this register, contains a map of the European site and a citation, both signed by me, giving the reasons for designation of the site as a Special Area of Conservation.

Other details of the European site are as follows:

Date designated as a Special Area of Conservation: 1 April 2005

Site centre location¹

Longitude: 00 41 35 W

Latitude: 51 09 42 N

Area: 5138.00

Priority status²: No

Date of registration: 14 June 2005

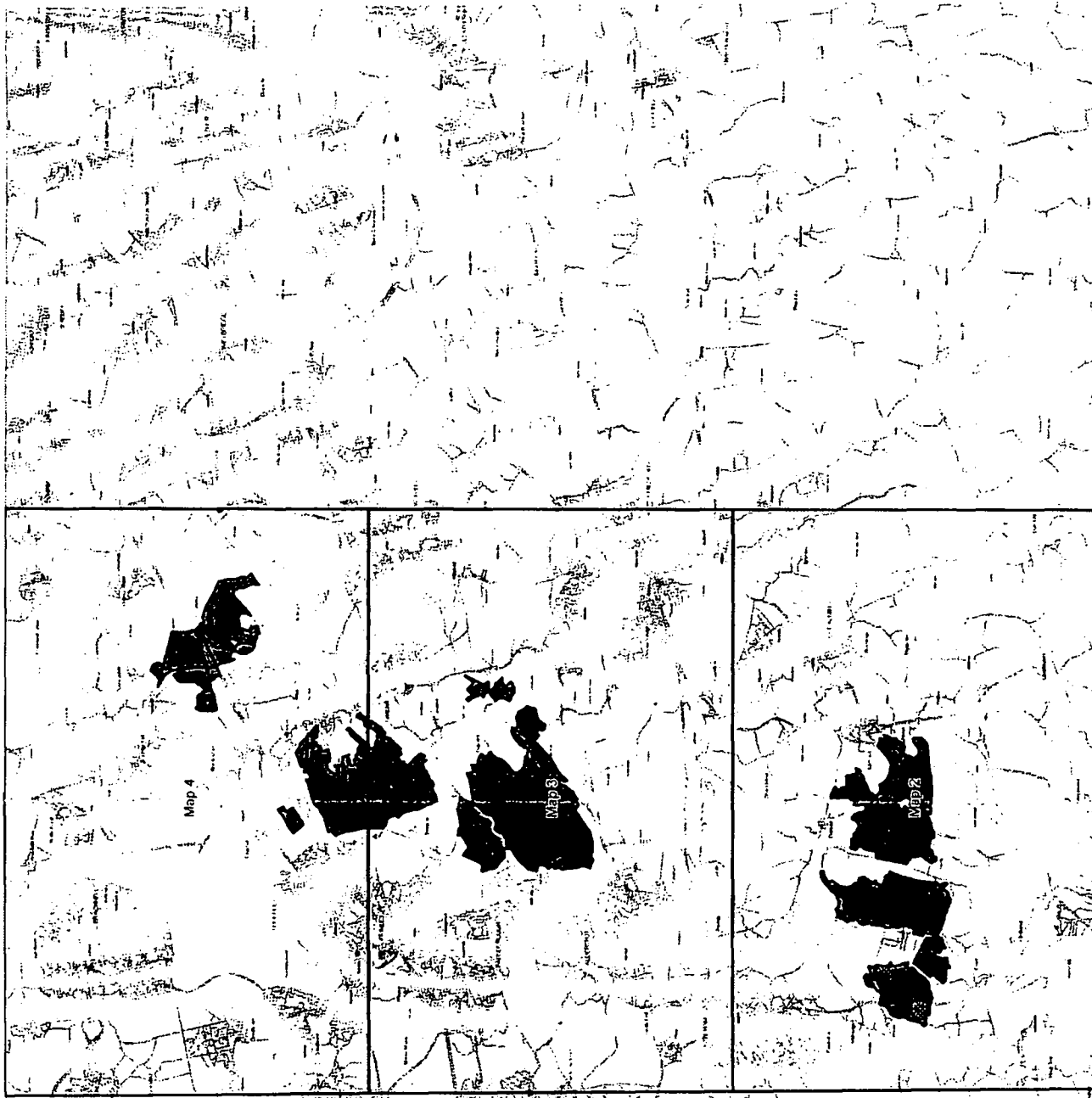
Signed: *Treas Salmon*

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

¹ This indicates the approximate centre of the site. Where the European site consists of several distinct areas, the co-ordinates of the most important sub-area are entered.

² Indicates whether the site has been identified under Article 4.2 of the Habitats Directive (Council directive 92/43/EEC) as hosting one or more priority natural habitat types or priority species.

APPENDIX 2 – DESIGNATED SITE LOCATION MAP



Scale 1:50000 at A3 Index map: Map 1 of 4

0 1000 2000 3000 4000

The map is based upon Ordnance Survey material with the assistance of other sources in order to complete the details of the map on 1 February 2006. All other copyright © Crown Copyright. Ordnance Survey.

EU Site Code: UK012333
 Longitude: 00 41 36 W
 Latitude: 51 09 42 N
 Grid Ref: SJ 01 44 11
 Projection: British National Grid

This map relates to a site entered in the Register of European Sites for Great Britain.
 Register reference number: UK012333
 Date of registration: 14 June 2005
 Signed: *Travis Scales*
 On behalf of the Secretary of State for Environment, Food and Rural Affairs

Special Area of Conservation: Diveshwa 92/03/EEC
 Designated by the Secretary of State for Environment, Food and Rural Affairs on 14 April 2005

Special Area of Conservation
 5130 Hectares
 Index of maps
 at 1:50000

Special Area of Conservation
 Ash, Pirbright
 Ham

APPENDIX 3 - DESIGNATED SITE - FEATURE IMPACT IDENTIFICATION

[Shadow] Screening opinion for planning consultation RU.08/0673 in consideration of regulation 48 of the Conservation (Natural Habitats, &c.) Regulations 1994 on a Natura 2000 site – Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC)
HR94 Screening No. F20.46.001

Sub-feature	Attribute	Target	Key hazard(s) ¹	Risk ²	Potential Impact / harm ³	Implications for Site Integrity
Designated habitats Northern Atlantic wet heaths with <i>Erica tetralix</i> (M16 & M21 Mires)	Extent	Maintain existing area on its current sites.	Physical loss of designated habitat and fragmentation.	L	Loss of designated habitat would reduce viability of whole SAC site.	Negative
	Bare Ground	'Natural' between 1-5% 'Heavily disturbed' <1%	Uncontrolled fire and site management.	L	Variation in physically area of bare ground outside the 1-5% natural band, or an increase >1% of heavily disturbed ground	Negative
	Vegetation Structure	> 20% <i>Schoenus tussocks</i> Scattered tussocks of <i>Molinia caerulea</i> but <50% cover >20% ericoids and >25% sphagnum cover Mosaic with <i>Calluna vulgaris</i> and <i>Erica tetralix</i> . < 30% <i>Ulex europaeus</i> in drier sites	Soil pH and nutrient levels are altered. Changes to the water table	H	Irreversible change in vegetation structure.	Negative
	Vegetation Composition	All species from List A must be at least frequent. At least two species of list B at least occasional	Soil pH and nutrient levels are altered. Changes to the water table	H	Irreversible change in vegetation composition.	Negative
	Vegetation Composition: rear species	Presence of <i>Gentiana pneumonanthe</i> , <i>Rhynchospora fusca</i> , <i>Lycopodiella inundata</i> , <i>Deschampsia setacea</i> . And for M21 - <i>Sphagnum magellanicum</i> , <i>S. pulchrum</i> , <i>Hammarbya paludosa</i> .	Soil pH and nutrient levels are altered. Changes to the water table	H	Irreversible change in vegetation structure resulting in loss of rear species	Negative
European dry heaths (H1 dry heathland and H2, H3, dry and humid	Extent	Maintain existing area on its current sites	Physical loss of designated habitat and fragmentation.	L	Loss of designated habitat would reduce viability of whole SAC site.	Negative

Key hazard is described as "a condition or physical situation with a potential for an undesirable consequence" (Source: Risk management for the environmental practitioner, IEMA (2006))
Risk is referred to "the potential for realisation of unwanted, adverse consequences to the environment", (ibid) and described in the context of a basic 3 level probability range from low (L), medium (M) to high (H).
Potential impact/harm is described as "the adverse response that results from a hazard that is realised", (ibid).

APPENDIX 3 - DESIGNATED SITE - FEATURE IMPACT IDENTIFICATION

[Shadow] Screening opinion for planning consultation RU.08/0673 in consideration of regulation 48 of the Conservation (Natural Habitats, &c.) Regulations 1994 on a Natura 2000 site - Thursley, Ash, Pibroght and Chobham Special Area of Conservation (SAC)
HR94 Screening No. F20.46.001

Sub-feature (heathland)	Attribute	Target	Key hazard(s) ¹	Risk ²	Potential impact / harm ³	Implications for Site Integrity
Depressions on peat substrates of the <i>Rhynchosporion</i> M16 and M21	Bare Ground	Natural ¹ for H2, H3 between 1 - 10% and 10-25% for H1 'Heavily disturbed' <1%	Uncontrolled fire and site management.	L	An increase >25% in physically area of bear ground, or a decrease <1%	Negative
	Vegetation Structure	Cover of <i>Calluna vulgaris</i> to be between 25% minimum and 90% maximum. Mosaic with >10% young and 30-50% mature / degenerate <i>Calluna vulgaris</i> within unit. Occasional to frequent bushes of <i>Ulex europaeus</i> to scattered brakes, cover < 25% <i>Ulex europaeus</i> of any unit.	Soil pH and nutrient levels are altered. Changes to the water table	H	Irreversible change in vegetation structure.	Negative
	Vegetation Composition	All species from List A must be at least frequent. At least two species of list B are at least occasional	Soil pH and nutrient levels are altered. Changes to the water table	H	Irreversible change in vegetation composition.	Negative
	Area	Maintain areas on current sites, recognizing ephemeral nature of this type of vegetation	Physical loss of designated habitat and fragmentation.	L	Loss of designated habitat would reduce viability of whole SAC site.	Negative
	Vegetation composition	At least three species should be present in addition to <i>Rhynchospora alba</i> .	Soil pH and nutrient levels are altered. Changes to the water table	H	Irreversible change in vegetation composition.	Negative
	Water quality	Water source should be base-poor and not contain plant macro nutrients	Soil pH and nutrient levels are altered. Changes to the water table	H	Irreversible change in water quality.	Negative
	Water supply	Maintain the peizometric head and areal spread of the water supply. No loss of area attributable to artificial drainage channels or lowering of water table	Changes to the water table as a result of water abstraction	M	Peat substrates would effectively dry out.	Negative

¹ Key hazard is described as "a condition or physical situation with a potential for an undesirable consequence" (Source: Risk management for the environmental practitioner, IEMA (2006))
² Risk is referred to "the potential for realisation of unwanted, adverse consequences to the environment", (ibid) and described in the context of a basic 3 level probability range from low (L), medium (M) to high (H).
³ Potential impact/harm is described as " the adverse response that results from a hazard that is realised", (ibid).

APPENDIX 3 - DESIGNATED SITE - FEATURE IMPACT IDENTIFICATION

[Shadow] Screening opinion for planning consultation RU.08/0673 in consideration of regulation 48 of the Conservation (Natural Habitats, &c.) Regulations 1994 on a Natura 2000 site – Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC)
HR94 Screening No. F20.46.001

Sub-feature	Attribute	Target	Key hazard(s) ¹	Risk ²	Potential impact / harm ³	Implications for Site Integrity
Dartford Warbler (<i>Sylvia undata</i>) European Nightjar (<i>Caprimulgus europaeus</i>) Woodlark (<i>Lullula arborea</i>)	Extent and distribution of habitat	No significant decrease from reference level	See: above	L	See: above	See: above
	Vegetation characteristics	No significant decrease from reference level	See: above	H	See: above	See: above
	Disturbance	No significant displacement of birds attributable to human disturbance in relation to reference level.	See: above	L	See: above	See: above
	Food availability	No significant decrease from reference level	See: above	L	See: above	See: above

¹ Key hazard is described as "a condition or physical situation with a potential for an undesirable consequence" (Source: Risk management for the environmental practitioner, IEMA (2006))
² Risk is referred to "the potential for realisation of unwanted, adverse consequences to the environment", (ibid) and described in the context of a basic 3 level probability range from low (L), medium (M) to high (H).
³ Potential impact/harm is described as "the adverse response that results from a hazard that is realised", (ibid).

APPENDIX 4 – PROJECT RELEVANCY TEST

[Shadow] Screening opinion for planning consultation RU.08/0673 in consideration of regulation 48(1) of the Conservation (Natural Habitats, &c.) Regulations 1994 (as amended) on a Natura 2000 site – Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC)

HR94 Screening No. F20.46.001

Project Component / Development Phase	Would this Project Component alone or in combination with other similar plans or projects have the potential to:	Yes	No	Unsure	Comments
Decommissioning	Physically reduce the extent of habitat.				Project presents no mechanism for effect
	Result in an increase occurrence of uncontrolled arson attacks.				Project presents no mechanism for effect
	Affect the management practices for this site.				Project presents no mechanism for effect
	Alter soil pH and nutrient levels.				Through the production and emission of gaseous pollutants to the atmosphere this project during this phase of development could possibly contribute in combination with other plans and projects to this mechanism for effect.
	Change water table level through water abstraction.				Project presents no mechanism for effect

APPENDIX 5 – REPRESENTATIONS

