



GUILDFORD
BOROUGH

Guildford Borough Council

Submission (regulation 15) Ash Neighbourhood Plan

Strategic Environmental Assessment and Habitat Regulations Assessment Screening Report and Determinations

January 2026

1. Introduction	3
Background and the purpose of this report	3
2. Legislative background	3
Habitat Regulations Assessment	3
Strategic Environmental Assessment	4
3. Habitat Regulations Assessment determination	5
4. Strategic Environmental Assessment	6
5. Background Documents	6
6. Appendices	7
Appendix 1: Ash Neighbourhood Plan Habitats Regulations Assessment	
Appendix 2: Ash Neighbourhood Plan Environmental Report	

1. Introduction

Background and the purpose of this report

- 1.1 Ash Neighbourhood Area was designated in April 2024. Ash Parish Council (the 'PC') then commenced producing a Neighbourhood Plan. As part of this process, the PC submitted a Strategic Environmental Assessment ('SEA') and Habitats Regulations Assessment ('HRA') Screening Opinion request letter, as well as a draft Scoping Report and Action Plan. The Scoping Report set out provisional policy ideas, as well as the purpose and need for the Ash Neighbourhood Plan (the 'NP').
- 1.2 The screening opinion request letter asked Guildford Borough Council ('the Council') to produce screening opinions as to whether the following documents would be required:
 - A HRA appropriate assessment, and
 - A SEA environmental report
- 1.3 The Council provided screening opinions based on the information available at the time, at an early stage before the NP was drafted. The screening opinions identified that the plan could have implications for both SEA and HRA, and that therefore both an appropriate assessment and an environmental report would be required.
- 1.4 The PC has now completed drafting the NP and has submitted it to the Council under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended). The submission includes:
 - A SEA environmental report, and
 - An updated HRA screening based on the policies within the submitted NP.
- 1.5 The purpose of this report is set out the formal determination by the Council, as the HRA competent authority, as to whether the Neighbourhood Plan would lead to HRA 'likely significant effects'. It also sets out the Council's view on the environmental report.

2. Legislative background

Habitat Regulations Assessment

- 2.1 HRA is required to determine whether a plan or project would have significant adverse effects upon the integrity of internationally designated sites of nature conservation importance, or Natura 2000 sites. The need for HRA is set out within the EC Habitats Directive 92/43/EEC and transposed into British Law by Regulation 105 of the Habitats Regulations.
- 2.2 The Habitats Regulations transpose Council Directive 92/43/EEC, on the conservation of natural habitats and of wild fauna and flora (EC Habitats Directive), into UK law. They also transpose elements of the EU Wild Birds Directive in England and Wales. They require HRA to

be undertaken for any plan or project likely to have a significant effect upon a European protected site.

- 2.3 An HRA is required for a plan or project to assess the potential implications for European wildlife sites, i.e. 'European sites' or 'Natura 2000 sites'. It explores whether the implementation of a plan or project would harm the habitats or species for which the European sites are designated. The European sites are:
- Special Protection Areas (SPAs) – designated by the Birds Directive (79/409/EEC as amended and 2009/147/EC), and;
 - Special Areas of Conservation (SACs) – designated by the Habitats Directive (92/43/EEC).
- 2.4 Ramsar sites are designated under the Ramsar convention. The Ramsar convention's mission is to conserve and sustainably utilise wetland habitats. Although Ramsar sites are not covered by the Habitats Regulations, as a matter of Government Policy, they should be treated in the same way as European wildlife sites (i.e. SPAs and SACs). European wildlife sites and Ramsar sites are collectively known as internationally designated wildlife sites. Sites of Community Importance (SCIs), which are sites that have been adopted by the European Commission but not yet formally designated by the government, must also be considered.
- 2.5 It is a requirement of Article 102 of the Habitats Regulations that "the plan-making authority for that plan must, before the plan is given effect, make an Appropriate Assessment of the implications for the site in view of that site's conservation objectives", where the plan is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and where it is not directly connected with or necessary to the management of the site.
- 2.6 Article 102 also requires that "in the light of the conclusions of the assessment, and subject to regulation 103 (considerations of overriding public interest), the plan-making authority must give effect to the land use plan only after having ascertained that it will not adversely affect the integrity of the European site or the European offshore marine site (as the case may be)".
- 2.7 Spatial planning documents, such as Neighbourhood Plans, are required to undergo HRA if they are not directly connected with, or necessary to, the management of a European site, which is the case for the Ash proposal.

Strategic Environmental Assessment

- 2.8 The purpose of SEA is to integrate considerations of the environment into the preparation and adoption of plans with a view to promoting sustainable development. Under the requirements of the SEA Directive and the SEA Regulations, specific types of plans that set the framework for the future development consent of projects must be subject to an environmental assessment.
- 2.9 In accordance with the provisions of the SEA Directive and the SEA Regulations (Regulation 9 (1)), the Council must determine whether a plan requires an environmental report. If the

Council determines that an environmental report is not required, Regulation 9(3) requires the Council to prepare a statement setting out the reasons for the determination.

- 2.10 SEA involves evaluation of the environmental impacts of a plan or programme. The SEA Directive sets out a legal assessment process that must be followed. Often within the planning context, the SEA requirements are met by incorporating it within a Sustainability Appraisal (SA), which is a requirement for Development Plan Documents, but not neighbourhood plans.
- 2.11 The Planning Practice Guidance makes it clear that SEA may be of relevance for neighbourhood plans where they could have significant environmental effects. To establish whether the plan proposal is thought to have significant environmental effects and therefore require an SEA environmental report, a screening process is necessary.

3. Habitat Regulations Assessment determination

- 3.1 The PC has provided a detailed screening assessment prepared by the consultancy, AECOM – See Appendix 1.
- 3.2 The AECOM screening assessment contains:
- Details of the HRA process, scope and methodology,
 - Information about relevant habitats sites, their features of interest and potential impact pathways,
 - A detailed likely significant effect screening assessment for each NP policy, and
 - An assessment of likely significant effects in combination with other plans and programmes.
- 3.3 The AECOM screening assessment concludes that the plan will not lead to likely significant effects on habitats sites either alone or in combination with other plans and programmes.
- 3.4 The Council has reviewed the information in the AECOM screening assessment and agrees with the analysis and conclusions. On this basis, the Council has therefore determined that the NP will not lead to likely significant effects on habitats sites, can be “screened out” on that basis, and that therefore a HRA appropriate assessment is not required.
- 3.5 The reasons for making this determination are set out in the AECOM screening assessment, but primarily are: the NP does not allocate sites for development, and it implements the established mitigation approach for the Thames Basin Heaths Special Protection Area for new residential development.
- 3.6 The Council is required to record its screening decision and the reasons for making it. This document satisfies these requirements.

4. Strategic Environmental Assessment

- 3.7 The PC has provided a SEA Environmental report prepared by AECOM (see Appendix 2). This document is a submission requirement for neighbourhood plans that have been “screened in” for SEA under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended).
- 3.8 The Council is not required to make a formal determination regarding the Environmental Report. However, officers have reviewed the document and do not have any objection to the report.

5. Background Documents

- The Conservation of Habitats and Species Regulations 2017. Available at: <http://www.legislation.gov.uk/uksi/2017/1012/contents/made>.
- The Environmental Assessment of Plans and Programmes Regulations 2004. Available at: <http://www.legislation.gov.uk/uksi/2004/1633/contents/made>
- Habitats regulations assessments: protecting a European site guidance. Available at: <https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site>

6. Appendices

Appendix 1: Ash Neighbourhood Plan Habitats Regulations Assessment

Appendix 2: Ash Neighbourhood Plan Environmental Report

Ash Neighbourhood Plan

Habitats Regulations Assessment

Ash Surrey Parish Council

November 2025

Quality information

Prepared by	Checked by	Verified by	Approved by
FL, Graduate Ecologist	DW, Principal Ecologist	JR, Technical Director	JR, Technical Director

Revision History

Revision	Revision date	Details	Authorized	Name	Position
0	29/07/25	Draft	JR	James Riley	Technical Director
1	28/11/25	Final	JR	James Riley	Technical Director

Distribution List

# Hard Copies	PDF Required	Association / Company Name

Prepared for:

Ash Surrey Parish Council

Prepared by:

AECOM Limited
Midpoint, Alencon Link
Basingstoke
Hampshire RG21 7PP
United Kingdom

T: +44 (0)1256 310200
aecom.com

© 2025 AECOM Limited. All Rights Reserved

AECOM Limited ("AECOM") has prepared this Report for the sole use of Ash Surrey Parish Council ("Client") in accordance with the terms and conditions of appointment dated ("the Appointment").

AECOM shall have no duty, responsibility and/or liability to any party in connection with this Report howsoever arising other than that arising to the Client under the Appointment. Save as provided in the Appointment, no warranty, expressed or implied, is made as to the professional advice included in this Report or any other services provided by AECOM.

Where any conclusions and recommendations contained in this Report are based upon information provided by the Client and/or third parties, it has been assumed that all relevant information has been provided by the Client and/or third parties and that such information is accurate. Any such information obtained by AECOM has not been independently verified by AECOM, unless otherwise stated in this Report. AECOM accepts no liability for any inaccurate conclusions, assumptions or actions taken resulting from any inaccurate information supplied to AECOM from the Client and/or third parties.

Table of Contents

1.	Introduction	1
	Background to the Project.....	1
	Local Context.....	1
	Legislative Framework	1
	The Layout of this Report.....	2
	Quality Assurance	2
2.	Methodology	3
	Introduction	3
	HRA Task 1 – Likely Significant Effects (LSE).....	3
	HRA Task 2 – Appropriate Assessment (AA).....	4
	HRA Task 3 – Avoidance and Mitigation.....	4
	Confirming Other Plans and Projects That May Act ‘In Combination’	5
3.	Physical Scope of the HRA.....	6
	Introduction	6
	Habitat Sites Relevant to Ash NP.....	6
	Relevant Impact Pathways	7
4.	Background to Relevant Impact Pathways	8
	Public Access, Disturbance, and Recreational Pressure	8
	Trampling Damage and Nutrient Enrichment.....	8
	Disturbance of Breeding Birds	9
	Habitats Sites Potentially Affected	10
	Water Quality	10
	Habitats Sites Potentially Affected	10
	Hydrological Changes.....	10
	Habitats Sites Potentially Affected	11
	Air Pollution: Atmospheric Nitrogen Deposition.....	11
	Habitats Sites Potentially Affected	13
	Urbanisation.....	13
	Habitats Sites Potentially Affected	13
5.	Test of Likely Significance Effects (ToLSE) – Screening	14
	Introduction	14
	Approach to Ash NP Policy Screening	14
	Results of Policy Screening	14
6.	In Combination Assessment	15
	Boroughs with Habitats Sites	15
	Borough of Guildford.....	15
	Borough of Surrey Heath	15
	Borough of Woking	15
	Borough of Elmbridge	15
	Borough of Waverley	15
	Borough of Rushmore.....	16
	Borough of Hart	16
	Borough of Bracknell Forest	16
	Boroughs within 5 km of Habitats Sites.....	16
	Borough of Windsor and Maidenhead.....	16
	Borough of East Hampshire.....	16
	Borough of Runnymede	16
	West Berkshire Unitary Authority	16
	Borough of Wokingham	16
	District of Basingstoke and Deane	16

District of Mole Valley.....	16
7. Conclusions	16
Appendix A Background to Designated Sites	17
A.1 Thursley, Ash, Pirbright and Chobham SAC	17
Introduction	17
Conservation Objectives	17
Qualifying features	17
Potential Environmental Vulnerabilities	18
A.2 Thames Basin Heaths SPA	18
Introduction	18
Conservation Objectives	19
Qualifying features	19
Potential Environmental Vulnerabilities	19
A.3 Thursley, Hankley and Frensham Commons SPA	20
Introduction	20
Conservation Objectives	20
Qualifying features	20
Potential Environmental Vulnerabilities	21
A.4 Thursley and Ockley Bogs Ramsar site	22
Introduction	22
Conservation Objectives	22
Qualifying features	22
Potential Environmental Vulnerabilities	22
Appendix B Policy Screening	1

Tables

Table 1 Habitats Sites descriptions and distance from Ash NP area	6
Table 2 Main sources and effects of air pollutants on habitats and species	12

1. Introduction

Background to the Project

- 1.1 AECOM was appointed by Ash Parish Council in Surrey to assist in undertaking a Habitats Regulations Assessment (HRA) of the Ash Neighbourhood Plan (hereafter referred to as the Neighbourhood Plan or 'the Plan'). The objectives of the assessment were to:
- Identify any aspects of the Neighbourhood Plan that would cause an adverse effect on the integrity of Habitats sites, otherwise known as Habitats Sites or Habitats Sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs), and, as a matter of Government policy, Ramsar sites), either in isolation or in combination with other plans and projects; and
 - To advise on appropriate policy mechanisms for delivering mitigation where such effects were identified.

Local Context

- 1.2 The parish has a population of approximately 18000 people (2021 census) and is densely populated, comprising Ash, Ash Green, and Ash Vale. Despite its rural location, it is well connected by train to Guildford, Reading, and London, by coach to Heathrow and Gatwick Airports, and by road to Farnham, Aldershot, and Guildford. The Basingstoke Canal historically connected the parish to Basingstoke, and it has now been restored as a leisure facility. There are several historic buildings in the parish, and sport and recreational facilities. The parish is part of the Borough of Guildford.

Legislative Framework

- 1.3 The UK left the EU on 31 January 2019 under the terms set out in the European Union (Withdrawal Agreement) Act 2020 ("the Withdrawal Act"). This established a transition period, which ended on 31 December 2020. The Withdrawal Act retains the body of existing EU-derived law within our domestic law. During the transition period EU law applies to and in the UK. The most recent amendments to the Habitats Regulations – the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019¹ – make it clear that the need for HRA has continued after the end of the Transition Period.
- 1.4 Under the Regulations, an appropriate assessment is required, where a plan or project is likely to have a significant effect upon an international site, either individually or in combination with other projects. The Directive is implemented in the UK by the Conservation of Habitats and Species Regulations 2017 (as amended) (the "Habitats Regulations").

The legislative basis for Appropriate Assessment

Conservation of Habitats and Species Regulations 2017 (as amended)

With specific reference to Neighbourhood Plans, Regulation 106(1) states that:

'A qualifying body which submits a proposal for a neighbourhood development plan must provide such information as the competent authority [the Local Planning Authority] may reasonably require for the purposes of the assessment under regulation 105 [which sets out the formal process for determination of 'likely significant effects' and the 'appropriate assessment']...'

- 1.5 It is therefore important to note that this report has two purposes:
- To assist the Qualifying Body (Ash Parish Council) in preparing their plan by recommending (where necessary) any adjustments required to protect international sites, thus making it more likely their

¹ These don't replace the 2017 Regulations but are just another set of amendments

plan will be deemed compliant with the Conservation of Habitats and Species Regulations 2017 (as amended); and

- On behalf of the Qualifying Body, to assist the Local Planning Authority (Guildford Borough Council) to discharge their duty under Regulation 105 (in their role as 'plan-making authority' within the meaning of that regulation) and Regulation 106 (in their role as 'competent authority').

1.6 As 'competent authority', the legal responsibility for ensuring that a decision of 'likely significant effects' is made, for ensuring an 'appropriate assessment' (where required) is undertaken, and for ensuring Natural England are consulted, falls on the local planning authority and the Neighbourhood Plan examiner. However, they are entitled to request from the Qualifying Body the necessary information on which to base their judgment and that is a key purpose of this report.

1.7 Over the years the phrase 'Habitats Regulations Assessment' has come into wide currency to describe the overall process set out in the Conservation of Habitats and Species Regulations from screening through to Imperative Reasons of Overriding Public Interest (IROPI). This has arisen in order to distinguish the process from the individual stage described in the law as an 'Appropriate Assessment'. Throughout this report we use the term Habitats Regulations Assessment for the overall process.

1.8 In spring 2018 the 'Sweetman' European Court of Justice ruling², clarified that 'mitigation' (i.e., measures that are specifically introduced to avoid or reduce a harmful effect on a Habitats site that would otherwise arise) should not be taken into account when forming a view on likely significant effects. Mitigation should instead only be considered at the Appropriate Assessment (AA) stage. This HRA has been cognisant of that ruling.

The Layout of this Report

1.9 This report:

- Explains the methodology used;
- Identifies Habitats sites of potential relevance to the Ash Neighbourhood Plan;
- Undertake the screening assessment of LSEs in relation to the Habitats sites, including impact pathways and AA where applicable; and
- Summarises conclusions and recommendations

Quality Assurance

1.10 This report was undertaken in line with AECOM's Integrated Management System (IMS). Our IMS places great emphasis on professionalism, technical excellence, quality, environmental and Health and Safety management. All staff members are committed to establishing and maintaining our certification to the international standards BS EN ISO 9001:2015 and 14001:2015, ISO 44001:2017 and ISO 45001:2018. In addition, our IMS requires careful selection and monitoring of the performance of all sub-consultants and contractors.

1.11 All AECOM Ecologists working on this project are members (at the appropriate level) of the Chartered Institute of Ecology and Environmental Management (CIEEM) and follow their code of professional conduct (CIEEM, 2017).

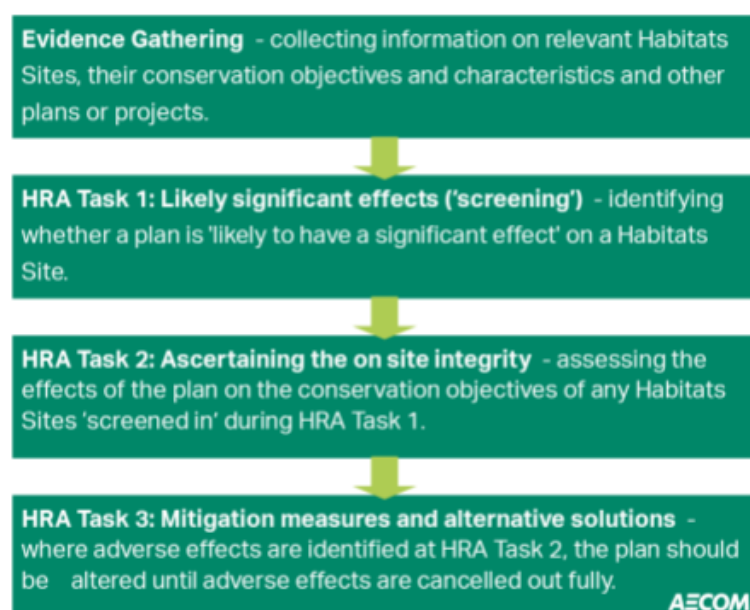
² People Over Wind and Sweetman v Coillte Teoranta (C-323/17)

2. Methodology

Introduction

- 2.1 The HRA has been carried out with reference to the general EC guidance on HRA (European Commission, 2001)³ and general guidance on HRA published by the UK government in 2021 (Department for Environment, Food & Rural Affairs, 2021)⁴.
- 2.2 Plate 1 below outlines the stages of HRA according to current Ministry of Housing, Communities, and Local Government⁵. The stages are essentially iterative, being revisited as necessary in response to more detailed information, recommendations, and any relevant changes to the Plan until no significant adverse effects remain.

Plate 1 Four Stage Approach to Habitats Regulations Assessment



HRA Task 1 – Likely Significant Effects (LSE)

- 2.3 Following evidence gathering, the first stage of any Habitats Regulations Assessment is a Test of Likely Significant Effect (ToLSE) test - essentially a risk assessment to decide whether the full subsequent stage known as Appropriate Assessment is required. The essential question is:
- “Is the project, either alone or in combination with other relevant projects and plans, likely to result in a significant effect upon Habitats sites?”*
- 2.4 The objective is to ‘screen out’ those plans and projects that can, without any detailed appraisal, be said to be unlikely to result in significant adverse effects upon Habitats sites, usually because there is no mechanism for an adverse interaction with Habitats sites.
- 2.5 In the Waddenzee case⁶ the European Court of Justice ruled on the interpretation of Article 6(3) of the Habitats Directive, including that:
- An effect should be considered ‘likely’, “if it cannot be excluded, on the basis of objective information, that it will have a significant effect on the site” (para 44);

³ European Commission (2001): Assessment of plans and projects significantly affecting Natura 2000 Sites: Methodological Guidance on the Provisions of Article 6(3) and 6(4) of the Habitats Directive

⁴ Available at: <https://www.gov.uk/guidance/appropriate-assessment>

⁵ Available at: <https://www.gov.uk/guidance/appropriate-assessment>

⁶ Case C-127/02

- An effect should be considered ‘significant’, “if it undermines the conservation objectives” (para 48); and
 - Where a plan or project has an effect on a site “but is not likely to undermine its conservation objectives, it cannot be considered likely to have a significant effect on the site concerned” (para 47).
- 2.6 The ToLSE consists of two parts: firstly, determining whether there are any policies that could result in negative impact pathways and secondly establishing whether there are any Habitats sites that might be affected. It identifies Habitats sites that could be affected by the Plan and also those impact pathways that are most likely to require consideration.
- 2.7 It is important to note that the ToLSE must generally follow the precautionary principle as its main purpose is to determine whether the subsequent stage of ‘Appropriate Assessment’ (i.e., a more detailed investigation) is required.

HRA Task 2 – Appropriate Assessment (AA)

- 2.8 Where it is determined that a conclusion of ‘no likely significant effect’ cannot be drawn, the analysis has proceeded to the next stage of HRA known as Appropriate Assessment. Case law has clarified that ‘Appropriate Assessment’ is not a technical term. In other words, there are no particular technical analyses, or level of technical analysis, that are classified by law as belonging to Appropriate Assessment rather than determination of likely significant effects. It literally means ‘*whatever level of further assessment is appropriate to form a conclusion regarding effects on the integrity of relevant Habitats sites*’.
- 2.9 In 2018 the Holohan ruling⁷ handed down by the European Court of Justice included among other provisions paragraph 39 of the ruling stating that ‘*As regards other habitat types or species, which are present on the site, but for which that site has not been listed, and with respect to habitat types and species located outside that site, ... typical habitats or species must be included in the appropriate assessment, if they are necessary to the conservation of the habitat types and species listed for the protected area*’ [emphasis added].
- 2.10 During July 2019 the current Ministry of Housing, Communities, and Local Government published guidance for Appropriate Assessment (Ministry of Housing, Communities, and Local Government, 2019)⁸.
- 2.11 Paragraph: 001 Reference ID: 65-001-20190722 explains: ‘Where the potential for likely significant effects cannot be excluded, a competent authority must make an appropriate assessment of the implications of the plan or project for that site, in view of the site’s conservation objectives. The competent authority may agree to the plan or project only after having ruled out adverse effects on the integrity of the habitats site. Where an adverse effect on the site’s integrity cannot be ruled out, and where there are no alternative solutions, the plan or project can only proceed if there are imperative reasons of over-riding public interest and if the necessary compensatory measures can be secured’.
- 2.12 One of the key considerations during Appropriate Assessment is whether there is available mitigation that would address the potential effect. In evaluating significance, AECOM will rely on professional judgement as well as the results of bespoke studies, supported by appropriate evidence/data within this assessment.

HRA Task 3 – Avoidance and Mitigation

- 2.13 Where necessary, measures are recommended for incorporation into the Plan in order to avoid or mitigate adverse effects on Habitats sites. There is considerable precedent concerning the level of detail that a Neighbourhood Plan document needs to contain regarding mitigation for recreational impacts on Habitats sites. The implication of this precedent is that it is not necessary for all measures that will be deployed to be fully developed prior to adoption of the Plan, but the Plan must provide an adequate policy framework within which these measures can be delivered.

⁷ Case C-461/17

⁸ Available at: <https://www.gov.uk/guidance/appropriate-assessment>

- 2.14 In evaluating significance, AECOM has relied on professional judgement and the Local Plan HRA regarding development impacts on the Habitats sites considered within this assessment.
- 2.15 When discussing 'mitigation' for a Neighbourhood Plan document, one is concerned primarily with the policy framework to enable the delivery of such mitigation rather than the detail of the mitigation measures themselves since the Local Development Plan document is a high-level policy document. A Neighbourhood Plan is a lower-level constituent of a Local Development Plan.

Confirming Other Plans and Projects That May Act 'In Combination'

- 2.16 It is a requirement of the Regulations that the impacts of any land use plan being assessed are not considered in isolation but in combination with other plans and projects that may also be affecting the Habitats site(s) in question.
- 2.17 In considering the potential for combined regional housing development to impact on Habitats sites the primary consideration is the impact of visitor numbers – i.e., recreational pressure and urbanisation.
- 2.18 When undertaking this part of the assessment it is essential to bear in mind the principal intention behind the legislation i.e., to ensure that those projects or plans (which in themselves may have minor impacts) are not simply dismissed on that basis but are evaluated for any cumulative contribution they may make to an overall significant effect. In practice, in combination assessment is therefore of greatest relevance when the plan or policy would otherwise be screened out because its individual contribution is inconsequential. The overall approach is to exclude the risk of there being unassessed likely significant effects in accordance with the precautionary principle. This was first established in the seminal Waddenzee⁹ case.
- 2.19 It is neither practical nor necessary to assess the 'in combination' effects of the Neighbourhood Plan within the context of all other plans and projects within Guildford (within which the Ash Neighbourhood Plan area is located) and the surrounding authorities. For the purposes of this assessment, we have determined that, due to the nature of the identified impacts, the other key plans and projects with potential for in combination likely significant effects are those schemes that can result in public access, recreational pressures or disturbance; hydrological changes and changes in water quality; wildfires or arson; air pollution, specifically the impact of atmospheric nitrogen deposition; and urbanisation. The Habitats Sites that may be affected by these impact pathways are Thursley, Ash, Pirbright and Chobham SAC, Thames Basin Heaths SPA, Thursley, Hankley, and Frensham Commons SPA, and Thursley and Ockley Bogs Ramsar Site.
- 2.20 The following in Local Plans have been assessed for their in-combination impacts to interact with the Ash Neighbourhood Plan:
- Guildford Local Plan
- 2.21 It should be noted that, while the broad potential impacts of these other projects and plans have been considered, this assessment does not undertake full HRA on each of these plans. Instead, existing HRAs that have been carried out for surrounding authorities and plans were drawn upon.
- 2.22 Within this document, each policy within the NP is subjected to HRA screening (summarised in Table 3). LSEs are then scrutinised in more detail in the main body of the report and where necessary, an AA is undertaken.

⁹ Waddenzee case (Case C-127/02, [2004] ECR-I 7405)

3. Physical Scope of the HRA

Introduction

- 3.1 There is no guidance that dictates the general physical scope of an HRA of a Plan document. Therefore, in considering the physical scope of the assessment, we were guided primarily by the identified impact pathways (called the source-pathway-receptor model).
- 3.2 Briefly defined, impact pathways are routes by which the implementation of a project can lead to an effect upon a Habitats site. An example of this would be visual and noise disturbance arising from the construction/decommissioning work or operational phase associated with a project. If there are sensitive ecological receptors within a nearby Habitats site (e.g. non-breeding overwintering birds), this could alter their foraging and roosting behaviour and potentially affect the site's integrity. For some impact pathways (notably air pollution) there is guidance that sets out distance-based zones required for assessment. For others, a professional judgment must be made based on the best available evidence.

Habitat Sites Relevant to Ash NP

- 3.3 In the case of the Ash Neighbourhood Plan, it has been determined that the Habitats Sites identified in Table 1 require consideration. The background to these Habitats Sites is discussed in Appendix A. A general search area of 10 km has been used.

Table 1 Habitats Sites descriptions and distance from Ash NP area

Site name and designation	Environmental Vulnerabilities	Distance from Neighbourhood Plan Boundary
Thursley, Ash, Pirbright and Chobham SAC	Public access/disturbance Undergrazing Forestry and Woodland Management Hydrological changes Inappropriate scrub control Invasive species Wildfire/arson Air pollution: Impact of atmospheric nitrogen deposition Feature location/extent/condition unknown Military Habitat fragmentation	Within NP boundary
Thames Basin Heaths SPA	Inappropriate Management Disturbance during the bird breeding season (March to July) Air pollution Urbanisation Maintenance of appropriate water levels Maintenance of water quality	Within NP boundary
Thursley, Hankley, and Frensham Commons SPA	Public access/disturbance Undergrazing Forestry and Woodland Management	5.80 km south

Site name and designation	Environmental Vulnerabilities	Distance from Neighbourhood Plan Boundary
	Hydrological changes Inappropriate scrub control Invasive species Wildfire/arson Air pollution: Impact of atmospheric nitrogen deposition Feature location/extent/condition unknown Military Habitat fragmentation	
Thursley and Ockley Bogs Ramsar Site	Water quality Water quantity, level, and flow Recreational pressure	6.99 km south

Relevant Impact Pathways

- 3.4 The Habitats Sites that are described in Table 1 and Appendix A are located within a 10 km radius of the Ash NP.
- 3.5 Based upon Natural England Site Improvement Plans (SIP) and Supplementary Advice on Conservation Objectives (SACO), there are several pathways that require consideration regarding increased development within the Ash NP area and said Habitats sites. These are:
- Public access/disturbance at Thursley, Ash, Pirbright and Chobham SAC and Thursley, Hankley, and Frensham Commons SPA
 - Disturbance during the breeding season at Thames Basin Heaths SPA
 - Recreational pressure at Thursley and Ockley Bogs Ramsar Site
 - Hydrological changes (water quantity, level, and flow) at Thursley, Ash, Pirbright and Chobham SAC, Thames Basin Heaths, Thursley, Hankley, and Frensham Commons SPA, and Thursley and Ockley Bogs Ramsar Site
 - Maintenance of water quality at Thames Basin Heaths SPA and Thursley and Ockley Bogs Ramsar Site
 - Wildfire/arson at Thursley, Ash, Pirbright and Chobham SAC and Thursley, Hankley, and Frensham Commons SPA
 - Air pollution: Impact of atmospheric nitrogen deposition at Thursley, Ash, Pirbright and Chobham SAC and Thursley, Hankley, and Frensham Commons SPA
 - Urbanisation at Thames Basin Heaths SPA
- 3.6 The other potential environmental vulnerabilities identified in Table 1 but not listed above have been scoped out as relevant impact pathways, as they relate to the management and use of the Habitats Sites, which is beyond the authority of the Ash parish council and the scope of Ash Neighbourhood Plan.

4. Background to Relevant Impact Pathways

Public Access, Disturbance, and Recreational Pressure

- 4.1 There is concern over the cumulative impacts of recreation on key nature conservation sites in the UK, as most sites must fulfil conservation objectives while also providing recreational opportunity. Various research reports have provided compelling links between changes in housing and access levels¹⁰, and impacts on Habitats sites^{11 12}. This applies to any habitat, but recreational pressure from housing growth is of particular significance for Habitats sites. Different Habitats sites are subject to different types of recreational pressures and disturbances and have different vulnerabilities. Studies across a range of species have shown that the effects from recreation can be complex. HRAs of planning documents tend to focus on recreational sources of disturbance due to new residents¹³.

Trampling Damage and Nutrient Enrichment

- 4.2 Most terrestrial habitats (especially heathland, woodland and dune systems) can be affected by trampling and other mechanical damage. This dislodges individual plants, leads to soil compaction and erosion. The following studies have assessed the impact of trampling associated with different recreational activities in different habitats:

- Wilson & Seney¹⁴ examined the degree of track erosion caused by hikers, motorcyclists, horse riders and cyclists in 108 plots along tracks in the Gallatin National Forest, Montana. Although the results proved difficult to interpret, it was concluded that horses and hikers disturbed more sediment on wet tracks, and therefore caused more erosion, than motorcycles and bicycles.
- Cole et al¹⁵ conducted experimental off-track trampling in 18 closed forest, dwarf scrub and meadow & grassland communities (each trampled between 0 – 500 times) over five mountain regions in the US. Vegetation cover was assessed two weeks and one year after trampling, and an inverse relationship with trampling intensity was discovered, although this relationship was weaker after one year than two weeks indicating some recovery of the vegetation. Differences in plant morphology (structure) was found to explain more variation in response than soil and topographic factors. Low-growing, mat-forming grasses regained their cover best after two weeks and were considered most resistant to trampling, while tall forbs (non-woody vascular plants other than grasses, sedges, rushes and ferns) were considered least resistant. The cover of hemicryptophytes (plants with buds at or near the soil surface) and geophytes (plants with buds below the soil surface) was heavily reduced after two weeks but had recovered well after one year. These were therefore considered most resilient to trampling. Chamaephytes (plants with buds above the soil surface) were least resilient to trampling. It was concluded that these would be the least tolerant of a regular cycle of disturbance.

¹⁰ Weitowitz D.C., Panter C., Hoskin R. & Liley D. (2019). The effect of urban development on visitor numbers to nearby protected nature conservation sites. *Journal of Urban Ecology* 5. <https://doi.org/10.1093/jue/juz019>

¹¹ Liley D, Clarke R.T., Mallord J.W., Bullock J.M. (2006a). The effect of urban development and human disturbance on the distribution and abundance of nightjars on the Thames Basin and Dorset Heaths. Natural England / Footprint Ecology.

¹² Liley D., Clarke R.T., Underhill-Day J., Tyldesley D.T. (2006b). Evidence to support the appropriate Assessment of development plans and projects in south-east Dorset. Footprint Ecology / Dorset County Council.

¹³ The RTP1 report 'Planning for an Ageing Population' (2004) which states that 'From being a marginalised group in society, the elderly are now a force to be reckoned with and increasingly seen as a market to be wooed by the leisure and tourist industries. There are more of them and generally they have more time and more money.' It also states that 'Participation in most physical activities shows a significant decline after the age of 50. The exceptions to this are walking, golf, bowls and sailing, where participation rates hold up well into the 70s'.

¹⁴ Wilson, J.P. & J.P. Seney. (1994). Erosional impact of hikers, horses, motorcycles and off-road bicycles on mountain trails in Montana. *Mountain Research and Development* 14:77-88

¹⁵ Cole, D.N. (1995a). Experimental trampling of vegetation. I. Relationship between trampling intensity and vegetation response. *Journal of Applied Ecology* 32: 203-214

Cole, D.N. (1995b). Experimental trampling of vegetation. II. Predictors of resistance and resilience. *Journal of Applied Ecology* 32: 215-224

- Cole¹⁶ conducted a follow-up study (across four vegetation types) in which shoe type (trainers or walking boots) and trampling weight were varied. Although immediate damage was greater with walking boots, there was no significant difference after one year. Heavier trampers caused a greater reduction in vegetation height than lighter trampers, but there was no differential impact on vegetation cover.
- 4.3 A major concern for nutrient-poor terrestrial habitats (including heathlands and bogs) is nutrient enrichment associated with dog fouling (addressed in various reviews¹⁷). It is estimated that dogs will defecate within 10 minutes of starting a walk and therefore most nutrient enrichment arising from dog faeces will occur within 400m of a site entrance. In contrast, dogs will urinate at frequent intervals during a walk, resulting in a more dispersed distribution of urine. For example, in Burnham Beeches National Nature Reserve it is estimated that 30,000 litres of urine and 60 tonnes of dog faeces are deposited annually¹⁸. While there is limited information on the chemical constituents of dog faeces, nitrogen is one of the main components¹⁹. Nutrient availability is the major determinant of plant community composition and the effect of dog defecation in sensitive habitats is comparable to a high-level application of fertiliser, potentially resulting in a shift towards plant communities that are more typical of improved grasslands.

Disturbance of Breeding Birds

- 4.4 Human activity can affect organisms directly (e.g. loss of habitat or by causing species to flee) and indirectly (e.g. by damaging their habitat or reducing their fitness in less obvious ways e.g. stress). The most obvious direct effect is the loss of habitat as a result of increased visitors to a site (i.e. trampling). But human activity can also lead to much subtler behavioural (e.g. alterations in feeding behaviour, avoidance of certain areas and use of sub optimal areas etc.) and physiological changes to species (e.g. an increase in heart rate). While these are less noticeable, they might result in major population-level changes by altering the balance between immigration/birth and emigration/death²⁰.
- 4.5 Impacts of bird disturbance is particularly well studied. Much research concern stem from the fact that birds expend energy unnecessarily when disturbed and the time they spend responding to humans is time that is not spent feeding²¹. Disturbance therefore risks increasing energetic expenditure of birds while reducing their energetic intake, which can adversely affect the 'condition' and ultimately survival of the birds. Additionally, displacement of birds from one feeding site to others can increase the pressure on the resources available within the remaining sites, as they then must sustain a greater number of birds. Moreover, the more time a breeding bird spends disturbed from its nest, the more its eggs are likely to cool and the more vulnerable they, or any nestlings, are to predators. Recreational effects on ground-nesting birds are particularly severe, with many studies concluding that urban sites support lower densities of key species, such as nightjar^{22 23}.
- 4.6 Evidence in the literature suggests that the magnitude of disturbance clearly differs between different types of recreational activities. For example, dog walking leads to a significantly higher reduction in bird diversity and abundance than hiking²⁴. Scientific evidence also suggests that key disturbance parameters, such as areas of influence and flush distance, are significantly greater for dog walkers than hikers²⁵. A UK meta-analysis suggests that important spatial (e.g. the area of a site potentially influenced)

¹⁶ Cole, D.N. (1995c). Recreational trampling experiments: effects of trampler weight and shoe type. Research Note INT-RN-425. U.S. Forest Service, Intermountain Research Station, Utah.

¹⁷ Taylor K., Anderson P., Taylor R.P., Longden K. & Fisher P. (2005). Dogs, access and nature conservation. English Nature Research Report, Peterborough.

¹⁸ Barnard A. (2003). Getting the facts – Dog walking and visitor number surveys at Burnham Beeches and their implications for the management process. *Countryside Recreation* 11:16-19.

¹⁹ Taylor K., Anderson P., Liley D. & Underhill-Day J.C. (2006). Promoting positive access management to sites of nature conservation value: A guide to good practice. English Nature / Countryside Agency, Peterborough and Cheltenham.

²⁰ Riley, J. 2003. Review of Recreational Disturbance Research on Selected Wildlife in Scotland. Scottish Natural Heritage.

²¹ Riddington, R. *et al.* 1996. The impact of disturbance on the behaviour and energy budgets of Brent geese. *Bird Study* 43:269-279

²² Clarke R.T., Liley D., Sharp J.M., Green R.E. 2013. Building development and roads: Implications for the distribution of stone curlews across the Brecks. PLOS ONE. doi:10.1371/journal.pone.0072984.

²³ Liley D., Clarke R.T. 2003. The impact of urban development and human disturbance on the numbers of nightjar *Caprimulgus europaeus* on heathlands in Dorset, England. *Biological Conservation* 114: 219-230.

²⁴ Banks P.B., Bryant J.Y. 2007. Four-legged friend or foe? Dog walking displaces native birds from natural areas. *Biology Letters* 3: 14pp.

²⁵ Miller S.G., Knight R.L., Miller C.K. 2001. Wildlife responses to pedestrians and dogs. 29: 124-132.

and temporal (e.g. how often or long an activity is carried out) parameters differ between recreational activities, suggesting that activity type is a factor that should be taken into account in HRAs²⁶.

- 4.7 Dogs being exercised, both on and off the lead results in a higher disturbance, which can erode conservation value²⁷. This is especially relevant in heathland areas with ground nesting birds, such as woodlark (*Lullula arborea*) and nightjar (*Caprimulgus europaeus*), and Dartford warblers (*Sylvia undata*), that nest close to the ground.
- 4.8 Thomas, Papworth, and Fellowes (2024) examined the disturbance caused by dogs in four heathland sites, including Chobham Common, part of the Thames Basin Heaths SPA (designated for woodlark, nightjar, and Dartford warbler). The study found that walking dogs off the lead significantly reduced the heathland habitat that was undisturbed and could be used for breeding by these bird species. Disturbance by area increased by 21% when dogs were allowed to walk off the lead, compared to on a lead. At Chobham, the low density of paths made this problem more severe, as disturbance was concentrated. 85% of dog owners did not comply with signs requesting dogs be kept on the lead. Increased disturbance by dogs can cause changes in bird behaviour, such as increased vigilance, putting stress on breeding birds.

Habitats Sites Potentially Affected

- 4.9 Overall, of the Habitats sites within 10 km of the Ash NP area, all four sites (Thursley, Ash, Pirbright, and Chobham SAC, Thames Basin Heaths SPA, Thursley, Hankley, and Frensham Commons SPA, and Thursley and Ockley Bogs Ramsar site) are potentially sensitive to recreational pressures and disturbance.

Water Quality

- 4.10 Water quality is an important determinant of the nature and condition of qualifying habitats and species in Habitats Sites. The primary concern in relation to freshwater and freshwater-dependant sites (such as bogs, mires, and wet woodlands) is the discharge of phosphorus in treated sewage effluent into connecting waterbodies or the Habitats Sites themselves. Declining water quality can have a range of environmental impacts:
- At high levels, toxic chemicals and metals can result in immediate death of aquatic life and have additional detrimental effects (even at lower levels), such as increased vulnerability to disease and changes in wildlife behaviour.
 - Eutrophication, the enrichment of plant nutrients in water, increases plant growth and consequently results in oxygen depletion. Algal blooms, which commonly result from eutrophication, increase turbidity and decrease light penetration. The decomposition of organic wastes that often accompanies eutrophication, deoxygenates water further, exacerbating the ongoing oxygen depletion. In the marine environment, nitrogen is the main growth-limiting plant nutrient and so eutrophication is primarily associated with discharges containing bioavailable nitrogen.
 - Some pesticides, industrial chemicals, and components of sewage effluent are suspected to interfere with the functioning of the endocrine system, possibly having negative effects on the reproduction and development of aquatic life.

Habitats Sites Potentially Affected

- 4.11 Overall, of the Habitats sites within 10 km of the Ash NP area, Thames Basin Heaths SPA and Ockley Bogs Ramsar site are potentially sensitive to changes in water quality.

Hydrological Changes

- 4.12 The water level, its flow rates and the mixing conditions are important determinants of the condition of Habitats sites and their qualifying features. Hydrological processes are critical in influencing habitat characteristics in wetlands, terrestrial systems that have hydrological associations (e.g. wet heath) and

²⁶ Weitowitz D., Panter C., Hoskin R., Liley D. The spatio-temporal footprint of key recreation activities in European protected sites. Manuscript in preparation.

²⁷ Thomas, R.L., Papworth S.K., Fellowes, M.D.E. (2024). Unleashed: walking dogs off the lead greatly increases habitat disturbance in UK lowland heathlands. *Urban ecosystems* 27: 2037-2046.

coastal waters, including current velocity, water depth, dissolved oxygen levels, salinity and water temperature. In turn these parameters determine the short- and long-term viability of plant and animal species, as well as overall ecosystem composition.

- 4.13 Rolls and Bond (2017, pp. 65-83)²⁸ summarised the ecological effects of reduced flow in rivers and connected water-dependent ecosystems. Droughts (ranging in their magnitude from flow reduction to a complete loss of surface water) have both direct and indirect effects on dependent floral and faunal communities. For example, the unique nature of wetlands combines shallow water and conditions that are ideal for the growth of organisms at the basal level of food webs, which feed many species of birds, mammals, fish and amphibians.
- 4.14 Maintaining a steady water supply is of critical importance for many hydrologically dependent SPAs, SACs and Ramsar sites. For example, in many freshwater bodies and wetlands the hydrological regime is essential for sustaining a variety of foraging habitats for SPA / Ramsar waterfowl species. However, different species vary in their requirements for specific water levels. Splash and / or shallow flooding is required to provide suitable feeding areas and roosting sites for ducks and waders. In contrast, deeper flooding is essential to provide foraging and loafing habitats for Bewick's swans and whooper swans.
- 4.15 Wetland habitats rely on hydrological connections with other surface waters, such as rivers, streams and lakes. A constant supply of water is fundamental to maintaining the ecological integrity of sites. However, while the natural fluctuation of water levels within narrow limits is desirable, excess or too little water supply might cause the water level to be outside of the required range of qualifying birds, invertebrate or plant species. This might lead to the loss of the structure and functioning of wetland habitats.
- 4.16 There are two mechanisms through which urban development might negatively affect the water level in Habitats Sites:
 - The supply of new housing with potable water will require increased abstraction of water from surface water and groundwater bodies. Depending on the level of water stress in the geographic region, this may reduce the water levels in Habitats Sites sharing the same catchment.
 - The proliferation of impermeable surfaces in urban areas increases the volume and speed of surface water runoff. As traditional drainage systems often cannot cope with the volume of stormwater, sewer overflows are designed to discharge excess water directly into watercourses. Often this pluvial flooding results in downstream inundation of watercourses and the potential flooding of wetland habitats.

Habitats Sites Potentially Affected

- 4.17 Overall, of the Habitats sites within 10 km of the Ash NP area, all four sites (Thursley, Ash, Pirbright, and Chobham SAC, Thames Basin Heaths SPA, Thursley, Hankley, and Frensham Commons SPA, and Thursley and Ockley Bogs Ramsar site) are potentially sensitive to hydrological conditions.

Air Pollution: Atmospheric Nitrogen Deposition

- 4.18 Nitrous oxides (NO_x) and ammonia (NH₃) are pollutants of concern for Habitats Sites. The sources and effects of these pollutants are detailed in
- 4.19 High levels of NO_x and NH₃ are likely to increase the total nitrogen (N) deposition to soil, potentially leading to knock-one effects in resident ecosystems. Increased N deposition from the atmosphere can, at high enough levels, enhance soil fertility and lead to eutrophication, adversely affecting the composition of the community and quality of semi-natural, nitrogen-limited terrestrial and aquatic habitats^{29,30}. Heathlands, which are nutrient-poor habitats, are especially vulnerable to changes in soil

²⁸ Rolls R., Bond N.R., (2017) 'Environmental and Ecological Effects of Flow Alteration in Surface Water Ecosystems' in Horne A., Webb J.A., Stewardson M.J., Richter B. *Water for the Environment: From Policy and Science to Implementation and Management* (pp.65-83)

²⁹ Wolseley P. A.; James P. W.; Theobald M. R. & Sutton, M. A. (2006). Detecting changes in epiphytic lichen communities at sites affected by atmospheric ammonia from agricultural sources. *Lichenologist* 38: 161-176.

³⁰ Dijk N. (2011). Dry deposition of ammonia gas drives species change faster than wet deposition of ammonium ions: evidence from a long-term field manipulation. *Global Change Biology* 17: 3589-3607.

fertility, which can cause a change in the plant community to one more typical of nutrient-rich soils, such as improved grasslands³¹.

Table 2 Main sources and effects of air pollutants on habitats and species

Pollutant	Source	Effects on Habitats and Species
Ammonia (NH ₃)	Ammonia is a reactive, soluble alkaline gas that is released following decomposition and volatilisation of animal wastes. It is a naturally occurring trace gas, but ammonia concentrations are directly related to the distribution of livestock. Ammonia reacts with acid pollutants such as the products of SO₂ and NO_x emissions to produce fine ammonium (NH₄⁺) - containing aerosol. Due to its significantly longer lifetime, NH₄⁺ may be transferred much longer distances (and can therefore be a significant trans-boundary issue). While ammonia deposition may be estimated from its atmospheric concentration, the deposition rates are strongly influenced by meteorology and ecosystem type.	The negative effect of NH₄⁺ may occur via direct toxicity, when uptake exceeds detoxification capacity and via N accumulation. Its main adverse effect is eutrophication, leading to species assemblages that are dominated by fast-growing and tall species. For example, a shift in dominance from heath species (lichens, mosses) to grasses is often seen. As emissions mostly occur at ground level in the rural environment and NH₃ is rapidly deposited, some of the most acute problems of NH₃ deposition are for small relict nature reserves located in intensive agricultural landscapes.
Nitrogen oxides (NO _x)	Nitrogen oxides are mostly produced in combustion processes. Half of NO_x emissions in the UK derive from motor vehicles, one quarter from power stations and the rest from other industrial and domestic combustion processes. In contrast to the steep decline in Sulphur dioxide emissions, nitrogen oxides are falling slowly due to control strategies being offset by increasing numbers of vehicles.	Direct toxicity effects of gaseous nitrates are likely to be important in areas close to the source (e.g. roadside verges). A critical level of NO_x for all vegetation types has been set to 30 µg/m³. Deposition of nitrogen compounds (nitrates (NO₃), nitrogen dioxide (NO₂) and nitric acid (HNO₃)) contributes to the total nitrogen deposition and may lead to both soil and freshwater acidification. In addition, NO_x contributes to the eutrophication of soils and water, altering the species composition of plant communities at the expense of sensitive species.
Nitrogen deposition	The pollutants that contribute to the total nitrogen deposition derive mainly from oxidized (e.g. NO_x) or reduced (e.g. NH₃) nitrogen emissions (described separately above). While oxidized nitrogen mainly originates from major conurbations or highways, reduced nitrogen mostly derives from farming practices. The N pollutants together are a large contributor to acidification (see above).	All plants require nitrogen compounds to grow, but too much overall N is regarded as the major driver of biodiversity change globally. Species-rich plant communities with high proportions of slow-growing perennial species and bryophytes are most at risk from N eutrophication. This is because many semi-natural plants cannot assimilate the surplus N as well as many graminoid (grass) species. N deposition can also increase the risk of damage from abiotic factors, e.g. drought and frost.

³¹APIS (no date), *Nitrogen Oxides (NOx)*. Available at: [Nitrogen Oxides \(NOx\) | APIS](#) (Accessed July 2025).

Habitats Sites Potentially Affected

- 4.20 Overall, of the Habitats sites within 10 km of the Ash NP area, Thursley, Ash, Pirbright, and Chobham SAC and Thursley, Hankley, and Frensham Commons SPA are potentially sensitive to the impacts of atmospheric nitrogen deposition.

Urbanisation

- 4.21 Whilst closely linked to recreational pressures and disturbance from public access, urbanisation includes a number of separate impacts which also stem from increased population, primarily within close proximity to an ecological receptor. These impacts include:
- Increased fly-tipping – Rubbish tipping is unsightly, but the principle adverse ecological effect of tipping is the introduction of invasive alien species with garden waste. Garden waste results in the introduction of invasive aliens precisely because it is the ‘troublesome and over-exuberant’ garden plants that are typically thrown out. Alien species may also be introduced deliberately or may be bird-sown from local gardens.
 - Cat predation - A survey performed in 1997 indicated that nine million British cats brought home 92 million prey items over a five-month period. A high proportion of domestic cats is associated with densely populated centres, with increasing residential development likely leading to increased cat predation.
 - Invasive species – Where private gardens lie near SAC / SPA habitats, there is a potential risk of introducing invasive species, such as through airborne seed dispersal, disposal of garden waste and cross-over of seedlings from boots / vehicle tyres. Invasive species introduction can increase competition in space-limited habitats and lead to changes in community composition
 - Wildfire / arson – An increase in residential development within close proximity to Habitats sites can lead to an increase in the occurrence of wildfire / arson, such as through illicit BBQs, disposal of cigarettes and deliberate arson. Such fires can lead to significant habitat loss, requiring extensive regeneration times to reach former complexity / maturity (20-30 years for heathland). It can also have severe impacts on ground-nesting bird species³².

Habitats Sites Potentially Affected

- 4.22 Overall, of the Habitats sites within 10 km of the Ash NP area, Thursley, Ash, Pirbright, and Chobham SAC and Thursley, Hankley, and Frensham Commons SPA are potentially sensitive to the impacts of arson and wildfire, and Thames Basin Heaths SPA is potentially sensitive to the impacts of urbanisation more generally.

³² Belcher et al., (2021) UK wildfires and their climate challenges. Expert Led Report Prepared for the third Climate Change Risk Assessment.

5. Test of Likely Significance Effects (ToLSE) – Screening

Introduction

- 5.1 When seeking to identify relevant Habitats sites, consideration has been given primarily to identified impact pathways and the source-pathway-receptor approach, rather than adopting purely a ‘zones’-based approach. The source-pathway-receptor approach is a standard tool in environmental assessment. In order for an effect to occur, all three elements of this mechanism must be in place, whereas the absence of one or more of the elements means there is no possibility for an effect. Furthermore, even where an impact is predicted to occur, it may not result in significant effects (i.e., those which undermine the Conservation Objectives of a Habitats site).
- 5.2 The likely zone of impact (also referred to as the likely Zone of Influence, Zol) of a plan or project is the geographic extent over which significant ecological effects are likely to occur. The Zol of a plan or project will vary depending on the specifics of a particular proposal and must be determined on a case-by-case basis with reference to a variety of criteria, including:
- the nature, size / scale and location of the plan;
 - the connectivity between the plan and Habitats sites, for example through hydrological connections or because of the natural movement of qualifying species;
 - the sensitivity of ecological features under consideration; and,
 - the potential for in-combination effects.

Approach to Ash NP Policy Screening

- 5.3 There are fourteen policies within the Ash NP. Policies were screened out of having LSEs on a Habitats site where any of the following reasons applied:
- they are environmentally positive;
 - they will not themselves lead to any development or other change;
 - they make provision for change but could have no conceivable effect on a Habitats site. This can be because there is no pathway between the policy and the qualifying features or a Habitats site, or because any effect would be positive;
 - they make provision for change but could have no significant effect on a Habitats site (i.e., the effect would not undermine the conservation objectives of a Habitats site); or,
 - the effects of a policy on any particular Habitats site cannot be ascertained because the policy is too general. For example, a policy may be screened out if, based on absence of detail in the policy, it is not possible to identify where, when, or how the policy may be implemented, where effects may occur, or which sites, if any, may be affected.
- 5.4 Any ‘criteria-based’ or development management policy (i.e., those that simply list criteria with which development needs to comply) or other general policy statements that have no spatial element were also screened out. Likewise, policies that simply ‘safeguard’ an existing resource (e.g., existing green infrastructure or mineral resources) by preventing other incompatible development, were also screened out.

Results of Policy Screening

- 5.5 The results of the LSEs screening of policies included in the Ash NP are presented in Table 3 Where a policy is shaded green, there are no linking impact pathways to Habitats sites, and LSEs can be excluded.

- 5.6 Of the fourteen Ash NP policies, none were identified as having a potential impact on Habitats Sites and all policies are therefore screened out following a ToLSE. This means no Appropriate Assessment of these policies is required.

6. In Combination Assessment

- 6.1 Impact pathways that have potential to link to the Neighbourhood Plan and to act in-combination with other projects or plans are as follows:

- Public access/disturbance at Thursley, Ash, Pirbright and Chobham SAC and Thursley, Hankley, and Frensham Commons SPA
- Disturbance during the breeding season at Thames Basin Heaths SPA
- Recreational pressure at Thursley and Ockley Bogs Ramsar Site
- Hydrological changes (water quantity, level, and flow) at Thursley, Ash, Pirbright and Chobham SAC, Thames Basin Heaths, Thursley, Hankley, and Frensham Commons SPA, and Thursley and Ockley Bogs Ramsar Site
- Maintenance of water quality at Thames Basin Heaths SPA and Thursley and Ockley Bogs Ramsar Site
- Wildfire/arson at Thursley, Ash, Pirbright and Chobham SAC and Thursley, Hankley, and Frensham Commons SPA
- Air pollution: Impact of atmospheric nitrogen deposition at Thursley, Ash, Pirbright and Chobham SAC and Thursley, Hankley, and Frensham Commons SPA
- Urbanisation at Thames Basin Heaths SPA

Boroughs with Habitats Sites

Borough of Guildford

- 6.2 The Parish of Ash is in the Borough of Guildford, which also includes parts of Thursley, Ash, Pirbright, and Chobham SAC, and Thames Basin Heaths SPA. Guildford Borough Council adopted the Local Plan: Strategy and Sites 2015-2034 in April 2019 (subject to an updated HRA³³ in May 2018), and the Local Plan: Development Management Policies in March 2023.
- 6.3 The updated HRA considered only the effects on the Thames Basin Heaths SPA, after consultation with Natural England. The HRA included a strategic assessment of urbanisation, recreational pressures, air pollution, water abstraction, and water quality.

Borough of Surrey Heath

- 6.4 The Borough of Surrey Heath includes parts of the Thursley, Ash, Pirbright, and Chobham SAC and Thames Basins SPA, and the entirety of the Thursley, Hankley, and Frensham Commons SPA is entirely located in the Borough of Surrey Heath.

Borough of Woking

- 6.5 The Borough of Woking includes parts of the Thames Basin Heath SPA and parts of the Thursley, Ash, Pirbright, and Chobham SAC.

Borough of Elmbridge

- 6.6 The Borough of Elmbridge includes parts of the Thames Basin Heath SPA.

Borough of Waverley

- 6.7 The Brough of Waverly includes parts of the Thursley, Ash, Pirbright, and Chobham SAC and Thames Basins SPA, and the entirety of the Thursley and Ockley Bogs Ramsar site.

³³ AECOM (2018) Habitats Regulations Assessment for Guildford Borough Proposed Submission Local Plan: Strategy and Sites. Available [here](#).

Borough of Rushmore

6.8 The Borough of Rushmore includes parts of the Thames Basin Heath SPA.

Borough of Hart

6.9 The Borough of Hart includes parts of the Thames Basin Heath SPA.

Borough of Bracknell Forest

6.10 The Borough of Bracknell Forest includes parts of the Thames Basin Heath SPA.

Boroughs within 5 km of Habitats Sites

Borough of Windsor and Maidenhead

6.11 The Brough of Windsor and Maidenhead is within 5 km of the Thursley, Ash, Pirbright, and Chobham SAC. It is also within 5 km of the Thames Basin Heaths SPA.

Borough of East Hampshire

6.12 The Brough of East Hampshire is within 5 km of the Thursley, Ash, Pirbright, and Chobham SAC, Thursley, Hankley and Frensham Commons SPA, and Thames Basin SPA.

Borough of Runnymede

6.13 The Brough of Runnymede is within 5 km of the Thursley, Ash, Pirbright, and Chobham SAC and Thames Basin Heaths SPA.

West Berkshire Unitary Authority

6.14 West Berkshire is within 5 km of the Thames Basin Heaths SPA.

Borough of Wokingham

6.15 The Borough of Wokingham is within 5 km of the Thames Basin Heaths SPA.

District of Basingstoke and Deane

6.16 The District of Basingstoke and Deane is within 5 km of the Thames Basin Heaths SPA.

District of Mole Valley

6.17 The District of Mole Valley is within 5 km of the Thames Basin Heaths SPA.

Recreational Pressure

6.18 The main impact pathway that must be considered for potential in-combination effects is recreational pressures and disturbances. At least 30,000 new dwellings have been allocated within 5 km of the Thames Basin Heaths SPA, with this number likely to increase following changes to the National Planning Policy Framework in December 2024. However as there are no allocations made within the Ash Neighbourhood Plan, it complies with the established mitigation strategy coordinated by the Thames Basin Heaths Partnership, and any in-combination effects are addressed by Guildford Brough Council's Local Plan.

7. Conclusions

7.1 The Ash Neighbourhood Plan has a total of fourteen policies. Of these policies, none were assessed as having the potential to cause likely significant effects on Habitats Sites due to an absence of impact pathways. No appropriate assessments were required.

7.2 No in-combination impacts were identified, as the Ash Neighbourhood Plan does not make any allocations and therefore poses no impact pathways to Habitats Sites. The Neighbourhood Plan includes reference to the established mitigation strategies for Thames Basin Heaths SPA.

Appendix A Background to Designated Sites

A.1 Thursley, Ash, Pirbright and Chobham SAC³⁴

Introduction

Thursley, Ash, Pirbright and Chobham SAC is an extensive complex of heaths in the south east of England with extensive areas of wet and dry heath, acid mire and bog pools. The complex is situated in the Surrey Hills Area of Outstanding Natural Beauty (AONB) and is part of the Weald National Character Area.

The underlying geology of the site is composed of Lower Greensand age marine deposits laid down in the Cretaceous period. This formation is made up of alternating sandstones and mudstones containing chert and ironstone, and the formation includes the distinct layers of the Folkestone Beds, Sandgate Beds and Bargate Beds. The Folkestone Beds make up the high ground in parts of the complex. These are mostly relatively free-draining sandstones but also include occasional 'lenses' of clay which impede drainage resulting in localised surface wetness and seepages. The Folkestone Beds are a base-poor formation and so water percolating through the beds generally remains nutrient and base-poor. The underlying Sandgate Beds are mostly made up of finer-grained materials and have a higher clay content and so are generally less free-draining.

It is this impeded drainage which gives rise to the formation of the mire systems. A further aspect of the geology is the influence of the Bargate Beds which are lower in the geological sequence. The Bargate Beds are fossiliferous calcareous sandstones with a high content of calcium carbonate. Water percolating through these deposits can develop a high base-status and this is thought to be the reason for a relatively high alkalinity in the water feeding the west side of the mire system on Thursley Common. Surface peat is present in the lower-lying waterlogged areas, which varies in thickness from 1-10cm over much of Ockley Common to a maximum depth of about 1.5 metres on parts of Thursley Common. The site is set in a landscape of extensive farmland, broadleaved woodland, pine woodland and small villages.

The complex includes outstanding examples of valley mire vegetation which supports very rich assemblages of wetland invertebrates, bryophytes and scarce plants, and which provide a habitat for breeding birds including curlew and snipe. Parts of the complex are managed as nature reserves with open public access. Other parts have military training ranges and have limited or no public access.

Conservation Objectives

The site's conservation objectives apply to the site and the habitats for which the site has been classified (the 'Qualifying features' listed below).

The objectives are to ensure that, subject to natural change, the integrity of the site is maintained or restored as appropriate, and that the site contributes to achieving the Favourable Conservation Status of its qualifying features, by maintaining or restoring:

- the extent and distribution of qualifying natural habitats
- the structure and function (including typical species) of qualifying natural habitats
- the supporting processes on which qualifying natural habitats rely

Qualifying features³⁵

The following qualifying Annex 1 habitats are the primary reason for the selection of this site as an SAC:

- Northern Atlantic wet heaths with *Erica tetralix*

This site represents lowland northern Atlantic wet heaths in south-east England. The wet heath at Thursley is NVC type M16 *Erica tetralix* – *Sphagnum compactum* and contains several rare plants, including great

³⁴ [Natural England Conservation Advice for Protected Sites Thursley, Ash, Pirbright & Chobham SAC](#)

³⁵ [Thursley, Ash, Pirbright and Chobham - Special Areas of Conservation \(JNCC\)](#)

sundew (*Drosera anglica*), bog hair-grass (*Deschampsia setacea*), bog orchid (*Hammarbya paludosa*) and brown beak-sedge (*Rhynchospora fusca*). There are transitions to valley bog and dry heath. Thursley Common is an important site for invertebrates, including the nationally rare white-faced darter (*Leucorrhinia dubia*).

- European dry heaths

This south-east England site contains a series of large fragments of once-continuous heathland. It is selected as a key representative of NVC type H2 *Calluna vulgaris* – *Ulex minor* dry heathland. This heath type has a marked south-eastern and southern distribution. There are transitions to wet heath and valley mire, scrub, woodland and acid grassland, including types rich in annual plants. The European dry heaths support an important assemblage of animal species, including numerous rare and local invertebrate species, nightjar (*Caprimulgus europaeus*), Dartford warbler (*Sylvia undata*), sand lizard (*Lacerta agilis*) and smooth snake (*Coronella austriaca*).

- Depressions on peat substrates of the Rhynchosporion

This site contains examples of Depressions on peat substrates of the *Rhynchosporion* in south-east England, where it occurs as part of a mosaic associated with valley bog and wet heath. The vegetation is found in natural bog pools of patterned valley mire and in disturbed peat of trackways and former peat-cuttings.

Potential Environmental Vulnerabilities³⁶

Thursley, Ash, Pirbright and Chobham SAC forms part of an extensive complex of lowland heathland, acid grassland, mire and commercial conifer plantations in south east England. The complex is located close to urbanization and therefore a number of potential environmental vulnerabilities currently impact the site, these include:

- Public access and disturbance;
- Undergrazing;
- Forestry and woodland management;
- Hydrological changes;
- Inappropriate scrub control;
- Invasive species;
- Wildlife/ arason;
- Air pollution;
- SAC feature's location/ extent/ condition unknown;
- Military; and
- Habitat fragmentation

A.2 Thames Basin Heaths SPA³⁷

Introduction

Covering approximately 8,274 hectares and spanning 11 local authority areas, Thames Basin Heaths SPA forms part of an extensive complex of lowland heathlands in southern England that support important breeding bird populations. It is located across the counties of Surrey, Hampshire and Berkshire and within the Thames Basin Heaths National Character Area (NCA) which stretches westwards from Weybridge in Surrey to the countryside around Newbury in Berkshire.

³⁶ [Thames Basin SIP](#)

³⁷ [Natural England Conservation Advice for Protected Sites Thames Basin Heaths SPA](#)

The SPA consists of areas of agriculturally-unimproved heathland, scrub and woodland which were once almost continuous but are now fragmented by roads, urban development and farmland. It supports important breeding populations of a number of birds which are strongly associated with heathland habitat, especially the ground nesting birds Nightjar and Woodlark, and also the Dartford Warbler which often nests close to the ground amongst dense heather and gorse.

The geology of the area consists of sand and gravel sediments which give rise to sandy or peaty acidic soils. These support dry heath vegetation in well-draining areas and wet heath vegetation in low-lying shallow slopes and bogs.

Conservation Objectives

The objectives are to ensure that, subject to natural change, the integrity of the site is maintained or restored as appropriate, and that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring:

- the extent and distribution of the habitats of the qualifying features
- the structure and function of the habitats of the qualifying features
- the supporting processes on which the habitats of the qualifying features rely
- the populations of each of the qualifying features
- the distribution of qualifying features within the site

Qualifying features

Thames Basin Heaths SPA qualifies under Article 4.1 of the Birds Directive (79/409/EEC) by supporting populations of European importance of the following species listed on Annex I of the Directive:

During the breeding season:

- Nightjar (*Caprimulgus europaeus*)
- Woodlark *Lullula arborea*
- Dartford Warbler *Sylvia undata*

Potential Environmental Vulnerabilities³⁸

The Thames Basin Heaths SPA are an extensive complex of lowland heathland, acid grassland, mire and commercial conifer plantations in south east England. Features supported by this rare habitat are Dartford warbler, woodlark, nightjar that are susceptible to disturbance generate by human activity. Current potential environmental vulnerabilities that are experienced by the site are:

- Appropriate Management;
- Management of disturbance during the breeding season (March to July);
- Air pollution;
- Urbanisation;
- Maintenance of appropriate water levels; and
- Maintenance of water quality.

³⁸ [Thames Basin SIP](#)

A.3 Thursley, Hankley and Frensham Commons SPA³⁹

Introduction

The Thursley, Hankley and Frensham Commons SPA forms a large complex of lowland heaths situated in Surrey close to the Hampshire border. The complex is set in a largely rural setting with an unspoilt character despite its close proximity to large population centres such as London and Guildford. The surrounding landscape includes oak woodlands, conifer woods and small pastures intersected by narrow, sunken lanes.

The underlying geology of the commons is predominantly made up by sandstones and ironstone belonging to the group known as Wealden Greensand of Cretaceous age. These form low hills and broad valleys, dissected by small streams. The deposits give rise to mostly free-draining sandy soils, but layers of less permeable deposits give rise locally to wetlands including mires, flushes and wet woodlands.

The complex is situated in the Surrey Hills Area of Outstanding Natural Beauty (AONB) and is in the Wealden Greensand National Character Area (NCA). Several parts of the site are used for military training and these areas have controlled public access. Part of the site is managed as a golf course. Most of the remainder has open public access and some of the sites are very popular destinations for a range of recreational activities including walking, birdwatching, horse riding, cycling and orienteering.

Part of the site, Thursley Common, is declared as a National Nature Reserve managed by Natural England.

Conservation Objectives

The objectives are to ensure that, subject to natural change, the integrity of the site is maintained or restored as appropriate, and that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring:

- the extent and distribution of the habitats of the qualifying features
- the structure and function of the habitats of the qualifying features
- the supporting processes on which the habitats of the qualifying features rely
- the populations of each of the qualifying features
- the distribution of qualifying features within the site

Qualifying features⁴⁰

Thursley, Hankley, and Frensham Common SPA qualifies under Article 4.1 of the Birds Directive (79/409/EEC) by supporting populations of European importance of the following species listed on Annex I of the Directive:

During the breeding season:

- Nightjar (*Caprimulgus europaeus*)

When classified, the SPA supported 20 pairs (which represented 1% of the British breeding population in 1984). The Thursley, Hankley and Frensham Commons SPA regularly supports internationally important numbers of nightjar. The European population of this species is thought to have undergone a significant decline in the past as a result of loss of suitable habitat. However, data suggests that there has been a trend of increasing numbers in recent years, which may be due to better protection of core breeding areas and improved management of lowland heathland.

Nightjars are nocturnal birds and can often be seen hawking for food at dusk and dawn. With pointed

³⁹[Natural England Conservation Advice for Protected Sites Thursley, Hankley & Frensham Commons SPA](#)

⁴⁰[Supplementary conservation advice THF Commons SPA](#)

wings and a long tails their shape is similar to a kestrel or cuckoo. Their cryptic, grey- brown, mottled, streaked and barred plumage provides ideal camouflage in the daytime. Nightjars are migratory, spending the winter months feeding in parts of Africa. The species is considered to be vulnerable to the effects of long-term climate change on drought-prone areas of Africa.

Nightjar regularly utilise areas across the SPA for nesting and feeding. Favoured areas of habitat are areas of heath with high structural diversity including bare patches or short vegetation, but they will also utilise clearings in woods, broad rides in conifer plantations and sparsely vegetated areas. Particularly large numbers of nightjar are regularly recorded in the SPA at Thursley, Hankley, Frensham and Elstead Commons but they occur widely across the complex.

- Woodlark (*Lullula arborea*)

When classified, the SPA supported 27 pairs (which represented 12% of the British breeding population in 1984). Woodlark regularly utilise the Thursley, Hankley and Frensham Commons SPA in internationally important numbers. This species suffered a serious population decline and contraction in range in the UK up until the latter part of the 20th century. The population is now recovering and colonising new areas as a result of protection and expansion of lowland heaths. The woodlark has also benefited from rotational management of conifer plantations where it can utilise recently felled areas and areas of young re-growth for nesting. Woodlarks favour areas of short vegetation or sparsely-vegetated areas on heaths with scattered trees for use as song-posts. They feed on seeds and small invertebrates. Numbers of woodlarks tend to fluctuate over time in relation to successional development of heaths and plantations, with large numbers often present following heath fires or tree clearance. Woodlarks are regularly recorded across most of the SPA with particularly large numbers often present at Thursley and Frensham Commons.

- Dartford Warbler (*Sylvia undata*)

When classified, the SPA supported 20 pairs (which represented 4% of the British breeding population in 1984). The Thursley, Hankley and Frensham Commons SPA regularly supports internationally important numbers of Dartford warbler. The SPA is close to the northern limit of the range of this species in Europe and numbers fluctuate depending upon winter and spring weather conditions. The species does not migrate and winter survival and breeding success can be badly affected by very cold winters or prolonged periods of snow cover. Cold, damp spring weather can also have damaging effects. Dartford warblers are strongly associated with lowland heaths with extensive patches of mature gorse with an abundance of favoured invertebrate prey items such as spiders. However, they will also nest in areas of mature heather, clearings in forestry plantations and patches of bracken.

Dartford warblers are widely distributed across the SPA and the site provides extensive areas of suitable habitat. Particularly large numbers of birds are regularly recorded at Hankley Common and Frensham Common but they are widely distributed across the complex.

Potential Environmental Vulnerabilities⁴¹

Thursley, Hankley and Frensham Commons SPA also forms part of an extensive complex of lowland heathland, acid grassland, mire and commercial conifer plantations in south east England. The complex is located close to urbanization and therefore a number of potential environmental vulnerabilities currently impact the site, these include:

- Public access and disturbance;
- Undergrazing;
- Forestry and woodland management;
- Hydrological changes;
- Inappropriate scrub control;
- Invasive species;
- Wildlife/ arason;
- Air pollution;

⁴¹ [Thames Basin SIP](#)

- SAC feature's location/ extent/ condition unknown;
- Military; and
- Habitat fragmentation.

A.4 Thursley and Ockley Bogs Ramsar site

Introduction⁴²

Thursley and Ockley Bog is a valley mire complex which occurs within a matrix of heathland, where drainage is impeded, and a deep layer of peat has built up from the remains of bog-moss *Sphagnum* spp. which forms much of the vegetation. Several areas of open water also contribute to the overall diversity of the site, ranging from acidic boggy pools and ditches to large ponds. It supports rare wetland invertebrates, all six native reptile species, and nationally important breeding populations of nightjar (*Caprimulgus europaeus*) and woodlark (*Lullula arborea*). Human activities include nature conservation, recreation, fishing, and military activities.

Conservation Objectives

Conservation objectives are not published for Ramsar sites.

Qualifying features⁴³

The site is designated under two Ramsar Criteria:

- Ramsar Criterion 2: Supports a community of rare wetland invertebrate species including notable numbers of breeding dragonflies.
- Ramsar Criterion 3: It is one of few sites in Britain to support all six native reptile species. The site also supports nationally important breeding populations of European nightjar and woodlark.

Potential Environmental Vulnerabilities

Being designated as a Ramsar only, there is no Site Improvement Plan that specifically covers the Thursley and Ockley Bog Ramsar. However, the following threats / pressures to the site can be deduced from the ecological interest features present within the site and the Ramsar Information Sheet: • Water quality • Water quantity, level and flow • Recreational pressure

⁴² [Thursley and Ockley bog Ramsar](#)

⁴³ [Thursley and Ockley Bog Ramsar Info Sheet \(JNCC\)](#)

Appendix B Policy Screening

Table 3 Screening of Ash Neighbourhood Plan Policies

Policy Name	Policy summary (full policy details can be found in the NP document)	Potential Likely Significant Effect?
ASH1: Spatial Strategy	The Neighbourhood Plan directs all significant residential, employment, commercial and cultural development to the built-up areas of Ash, Ash Vale and Ash Green, as set out in the GBC Local Plan Ash and Tongham Urban Area and shown on the Policies Map, with a focus on reusing brownfield land to reinforce and sustain the two communities and support local facilities, shops and services to continue to meet the day-to-day needs of the local community in line with 'walkable neighbourhood' principles. New residential development may only be located outside of the 400m SPA buffer zone. Development outside of these areas, as shown on the Policies map, will only be supported if it accords with the development plan policies relating to the countryside, with a focus on enhancing the natural environment, or the Green Belt, as relevant.	No Likely Significant Effects This is policy relates to the settlement boundaries and safeguarding rural areas from urban development. It does not identify any location, type or quantum of development. There are no impact pathways present.
ASH2: Design Principles in Ash	A. All development should achieve high quality design that contributes positively to local distinctiveness, quality of life and enhances the character of Ash. To achieve this development proposals are required to have full regard the Ash Design Guidance and Codes attached as Appendix A, as relevant to their location, scale and nature. B. Where a proposal does not seek to follow the requirements of the Code then the applicant will be obliged to justify why an exception should be made.	No Likely Significant Effects This is a development management policy relating to development design. It does not identify any location, type or quantum of development. There are no impact pathways present.
ASH3: Design Principles in Ash Vale	A. All development should achieve high quality design that contributes positively to local distinctiveness, quality of life and enhances the character of Ash Vale. To achieve this development proposals are required to have full regard the Ash Design Guidance and Codes attached as Appendix A, as relevant to their location, scale and nature. B. Where a proposal does not seek to follow the requirements of the Code then the applicant will be obliged to justify why an exception should be made. C. Proposals within the Conservation Area or its setting which demonstrate that they preserve or enhance the special historic interest of the Area, complying with the Ash Design Guidance and Codes as relevant to location, nature and scale of the scheme, will be supported.	No Likely Significant Effects This is a development management policy relating to development design. It does not identify any location, type or quantum of development. There are no impact pathways present.
ASH4: Design Principles in Ash Green Village	A. All development should achieve high quality design that contributes positively to local distinctiveness, quality of life and enhances the character of Ash Green. To achieve this development proposals are required to have full regard the Ash Design Guidance and Codes attached as Appendix A, as relevant to their location, scale and nature. B. In addition, development proposals should have full regard to: - Demonstrating sensitive design where site boundaries affect the setting of the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected. - Ensuring that any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between any	No Likely Significant Effects This is a development management policy relating to settlement boundaries, the heritage character of the area and new development design. There are no impact pathways present

Policy Name	Policy summary (full policy details can be found in the NP document)	Potential Likely Significant Effect?
	proposed new development and the properties fronting onto Ash Green Road. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond. - Ensuring links to the active travel network are safe and accessible, improving identified routes principally to Ash Station and to local services and facilities as well as public footpaths and bridleways that lead to the wider countryside. - Creating opportunities to enhance the character of the urban edge, for example new woodland planting or the creation of new 'greens' and 'commons'. - Conserving and enhancing the hedgerow network and hedgerow trees particularly in proximity to the urban edge where hedgerows can provide a strong landscape pattern and framework. New planting must be native species only. Where existing hedgerows include non-native or invasive species, these should ideally be replaced with native species. - Where a proposal does not seek to follow the requirements of the Code then the applicant will be obliged to justify why an exception should be made. C. The Neighbourhood Plan defines the Settlement Gap between Ash and Ash Green as shown on the Proposals Map for the purpose of preventing the coalescence of the settlements. No development will be permitted in this area which would result in the joining of the two settlements, or where it would erode their separate identities by virtue of their closer proximity.	
ASH5: Local Centres and Dispersed Local Shops	The Neighbourhood Plan identifies the following local shopping centres and dispersed local shops as shown on the Policies Map as follows: Ash Street/Star Lane Local Centre, Longfield Road Local Shop, Aldershot Road Local Shop, Guildford Road Local Shops, Oxenden Road Local Shop The Neighbourhood Plan also identifies the broad location around Foreman Road, Ash Green Road, Harpers Road and White Lane, as shown on the Policies Map, as walkable communities that are primarily residential areas lying more than 800m walk from the defined District Centre or Local Centre. - In each identified location, proposals comprising of of Class E(a) retail, Class E(b) cafes and Class F2(a) shops selling essential goods no exceeding 280m2, will be supported in principle where it complies with §97 of the NPPF. - Proposals defined in Clause A may be delivered as ground floor units in a scheme with housing on upper floors if designed to manage any potential for conflicts in amenity between those uses. - Proposals that comprise one or more uses defined in Clauses A must demonstrate that the site is located and accessible by walking, cycling and/or public transport from established residential areas in a walkable community area in safe and convenient ways. - Proposals that will result in the partial or total loss of a local centre or dispersed local shop will be resisted unless it can be clearly demonstrated that: - all reasonable efforts have been made to market the premises for its existing use and no other potential occupier can be found; - all reasonable efforts have been made to improve the operation and management of the business or facility; or - the land is no longer a suitable location for a retail uses and suitable alternative shops exist to meet the needs of the local community	No Likely Significant Effects This is a development management policy relating to the provision of local shopping and service facilities within the area. It does not designate areas for new facilities. Any development brought forward will be subject to a Planning Application and may require further HRA. There are no impact pathways present.

Policy Name	Policy summary (full policy details can be found in the NP document)	Potential Likely Significant Effect?
ASH6: Employment Locations	The Neighbourhood Plan identifies the Strategic Employment Location at North and South of Lysons Avenue and designates a Locally Important Employment Location at Land at Ash Station as shown on the Policies Map. These industrial complexes are of economic value to the parish and fundamental to the maintenance of a well-balanced mix of land uses which should include opportunities for locally owned and managed small businesses serving the local community. A. Proposals for the intensification of employment uses on the Strategic or Locally Important Employment Location for new Class E(g) and B2 uses, will be supported, provided they will not cause significant harm to the amenity of adjoining residential areas. B. Proposals for the change of use of land or premises on the Locally Important Employment Location, to a non-Class B2 use (including residential led proposals), will only be acceptable where schemes comprise a mix of uses that retains commercial units within the site and avoids the net loss of employment opportunities. C. Redevelopment or change of use to a non-employment use will only be acceptable if evidence is provided of active and comprehensive marketing of the site for its current use, other Class B uses or for alternative employment generating uses, for a continuous period of at least 18 months prior to submission of a planning application.	No Likely Significant Effects This is a general policy relating to employment within the area. While a Strategic Employment Location is identified (as well as a Locally Important Employment Location) no actual allocations or quantum of growth are identified. Any development brought forward will be subject to a Planning Application and may require further HRA. There are no impact pathways present
ASH7: Replacement Dwellings	A. Development proposals for replacement dwellings should have regard to the provisions of the Ash Design Guidance and Codes (May 2025) and evidence the following criteria: i. they maintain, or where possible enhance, the prevailing character and appearance of buildings in the immediate area; ii. they have due regard to the scale, mass, design and layout of existing residential dwellings in the surrounding area; iii. they safeguard the amenities of adjacent residential dwellings and their curtilages; iv. any loss of biodiversity value on the site will be fully mitigated, and measures to create an ecological net gain through habitat creation and enhancement are incorporated as part of the proposal. B. Replacement building proposals must evidence that alternative options including refurbishment, retrofitting, extending or conversion have been fully explored prior to pursuing a demolition and rebuild development.	No Likely Significant Effects This is a development management policy that relates to the design and sustainability of replacement dwellings ('knock-down and rebuild'). It does not identify the location, type or extent of development. Any development brought forward will be subject to a Planning Application and may require further HRA. There are no impact pathways present.
ASH8: Energy Efficiency	A. New and replacement dwellings should be 'zero carbon ready' by design to minimise the amount of energy needed to heat and cool buildings through landform, layout, building orientation, massing and landscaping. Consideration should be given to resource efficiency at the outset and applications should evidence whether existing buildings can be re-used as part of the scheme to capture their embodied carbon. B. New and replacement dwellings proposed to be certified to a Passivhaus or equivalent standard with a space heating demand of less than 15KWh/m2/year will not be subject to the provisions of Clause C. Where schemes that maximise their potential to meet this standard by proposing the use of modern methods of construction and the use of terraced and/or apartment building forms of plot size, plot coverage and layout that are different to those of the character area within which the proposal is located, this will be supported, provided it can be demonstrated that the scheme will not have a significant harmful effect on the character area. C. All planning permissions granted for replacement buildings should demonstrate that they have been tested to ensure the buildings will perform as predicted, including planning conditions to require post construction test information (prior to occupancy) and provision of a Post Occupancy Evaluation report to the local planning authority within a specified period, unless exempted by Clause B. Where the report identifies poor energy performance and makes recommendations for reasonable corrective action, the applicant must demonstrate that those actions have been implemented before the condition will be discharged.	No Likely Significant Effects This is a development management policy that relates to the sustainability of new and replacement dwellings. It does not identify the location, type or extent of development. Any development brought forward will be subject to a Planning Application and may require further HRA. There are no impact pathways present.

Policy Name	Policy summary (full policy details can be found in the NP document)	Potential Likely Significant Effect?
	D. All planning applications for major development are also required to be accompanied by a full Lifecycle Carbon Analysis (LCA), using a recognised methodology, to demonstrate actions taken to reduce embodied carbon resulting from the construction and use of the building over its entire life. E. A Climate Change Statement will be submitted to demonstrate compliance with the policy. The statement will include a passive design capacity assessment to demonstrate how opportunities to reduce the energy use intensity (EUI) of the building(s) over the plan period have been maximised in accordance with the energy hierarchy. Designers shall evaluate the operational energy use using realistic information on the intended use, occupancy and operation of the building to minimise any performance gap.	
ASH9: Housing Mix, Type, and Tenure	Proposals for all residential development should seek to include in their housing mix a type and tenure suitable for first time buyers, those looking to rent their first home and downsizers. A. Housing development of 11 or more dwellings, must deliver 40% affordable housing on site. B. Affordable housing must be delivered in the form of: 30% affordable home ownership 70% affordable rent and social rent, with the mix to be determined on a site-by-site basis at the planning application stage C. Proposals for residential development will be expected to provide a mix of dwelling types and sizes to address the nature of local needs and contribute to the objective of creating a mixed and balanced community. To achieve this objective, provision should be made for 2 & 3 bedroom dwellings which should comprise 70% or more of the total in schemes of five or more dwellings. D. All Development proposals should be delivered as accessible and adaptable dwellings in accordance with Building Regulations M4(2), unless evidence can be provided to demonstrate that such provision would be impracticable or render the scheme unviable. The provision of homes constructed to Building Regulations Part M4(3) for wheelchair accessible homes will also be supported.	No Likely Significant Effects This is a development management policy that relates to the affordability of new dwellings. It does not identify the location, or extent of development. There are no impact pathways present.
ASH10: Existing and New Community Assets	A. The Neighbourhood Plan identifies existing community facilities on the Policies Map and listed in Appendix B: - Proposals that will result in either the loss of, or cause significant harm to, a defined facility will be resisted, unless it can be clearly demonstrated that the operation of the facility is no longer financially viable. - Proposals to sustain or extend the viable use of existing community facilities and the development of new facilities, to ensure local residents have sufficient good quality social infrastructure will be supported. B. Proposals to extend, diversify, improve and introduce new school place capacity, day nursery or other early years settings will be supported provided: - the scale of the buildings and structures minimise the effect of the scheme on local residential amenity by way of traffic, on-street car parking and outdoor noise and lighting pollution; and - there is adequate provision to encourage walking and/or cycling to and from the facility. C. The Neighbourhood Plan designates 0.27 ha of land at Ash Lodge Drive, as shown on the Policies Maps for Class C2 use with ancillary Class F2 Local Community Uses. Development proposals in this location must include the creation of community facilities to serve the immediate neighbourhood as well as the wider parish for social, recreational, cultural or health and wellbeing purposes.	No Likely Significant Effects This is policy identifies existing community facilities and designates land for the development of new community facilities. However, the policy is non-specific regarding the type or extent of development, and in itself has no conceivable effect on a Habitats Site. Any development brought forward will be subject to a Planning Application and may require further HRA. There are no impact pathways present.
ASH11: Green and Blue Infrastructure	A. Development proposals that lie within or adjoining the Green and Blue Infrastructure Network, as shown on the Policies Map, are required to have full regard to creating, maintaining and improving the functionality of the Network in the design of their layouts, landscaping schemes and public open space provisions. Proposals that will harm the functionality or connectivity of the Network, will not be supported.	No Likely Significant Effects This policy relates to Green and Blue Infrastructure, improving connectivity of ecologically valuable sites and

Policy Name	Policy summary (full policy details can be found in the NP document)	Potential Likely Significant Effect?
	B. Development proposals should align with and contribute to the delivery of the Local Nature Recovery Strategy, to maximise nature recovery in the local area. C. Proposals for new development requiring the provision of on-site open space will be supported where the design of open space is integral to the scheme and is effectively connected to any adjoining green infrastructure assets. Where appropriate, developers will be expected to enter into a planning obligation to secure satisfactory arrangements for the long-term management of this open space. Proposals for smaller infill schemes should also create opportunities to connect their landscape schemes (where relevant) with adjoining green infrastructure assets. D. New development will also be required to retain trees and native hedgerows, wherever possible and to secure opportunities to create connected habitats suitable for species adaptation to climate change. Where they are unavoidably lost, replacement trees and hedgerows using indigenous species, resilient to climate change, must be planted (two trees must be planted for every one lost). All proposals for development in the Plan area must ensure that any potential impacts upon rare and threatened species and habitats are fully assessed, and that, where necessary, mitigation measures are incorporated to safeguard and protect those species and habitats. E. Save for householder applications, development proposals on sites of 0.5ha or above, are required as a minimum to achieve a future canopy cover of 20% of the site area principally through the retention of existing trees and the planting of new trees. Where it can be demonstrated that this is impracticable, the use of other green infrastructure (e.g. green roofs and walls) can be used where they are capable of offering similar benefits to trees. F. Development proposals on sites below 0.5 Ha, are required to maximise the opportunities available for canopy cover, including tree retention and planting or the provision of other green infrastructure (e.g. green roofs, walls and rain gardens).	recreational areas, and increasing biodiversity in the area, and is environmentally positive. There are no impact pathways present.
ASH12: Local Green Spaces	The Neighbourhood Plan designates Local Green Spaces in the following locations, as shown on the Policies Map and listed below. Ash Vale 1) Carrington Recreation Ground 2) Snaky Lane Nature Reserve 3) Lakeside Nature Reserve Play Area 4) Cody Close Playground and Vickers Road Open Space 5) Sopwith Close Playground and Open Space 6) Keogh Barracks Playing Fields 7) Avondale Play Ground 8) Old Farm Place Play Area 9) Shackleton Close Playground and Open Space Ash 10) Ash Common Recreation Ground 11) Coronation Gardens 12) Coronation Extension Gardens 13) Harpers Recreation Ground 14) Open space adjacent to Ash United Football Club (Shawfield Rec) 15) Open space off Old School Close (formerly Heathcote School Field) 16) Heathcote Play Area (Parson's Nose)	No Likely Significant Effects This is a development management policy that designates and safeguards Local Green Spaces There are no impact pathways present.

Policy Name	Policy summary (full policy details can be found in the NP document)	Potential Likely Significant Effect?
	17) Rowan Field 18) Harpers Road Allotments 19) Shawfield Road Allotments Ash South 20) Manfield Open Space 21) Ash Green Meadows 22) The Briars Play Ground and open space east of South Lane and Dan's Meadow 23) Ashely Park Play Area (Blackwater Close) 24) Parish Close Play Area and open space 25) Hop Garden Way Play Area 26) Hop Garden Way Sports Court Playground and Open Space 27) Minleys Close Playgrounf 28) Holme Close Play Area 29) Yalden Gardens Play Area 30) Alden Copse Play Area 31) Parsons Way Play Area 32) Wanborough Way Playground 33) Compass Rose Road Play Area 34) Green Space South of Hazel Road 35) Green Spaces West of White Lane New development will not be permitted on land designated as Local Green Space except in very special circumstances or where it is ancillary to the use of the land for public recreational purposes.	
ASH13: Thames Basin Heath SPA	Residential schemes will be required to include proposals for mitigating their effects on the ecological integrity of the Thames Basin Heath Special Protection Area. This could be through on-site provision or off-site financial contributions in accordance with the requirements of the development plan, including compliance with the principles set out in adopted Development Plan policies in the Local Plan and with Guildford Borough Council's Thames Basin Heath SPA SPD	No Likely Significant Effects This is a development management policy that relates to Thames Basin SPA, requiring new housing development to mitigate any effects on the ecological integrity of the Site, and is environmentally positive. There are no impact pathways present.
ASH14: Active Travel	A. The Neighbourhood Plan identifies a walking and cycling network, as shown on the Policies Map, with the purpose of supporting healthy and safe active travel opportunities. B. Proposals which create opportunities to improve this network, including the addition of new walking and cycling routes to connect the existing and new residential areas of the parish with local shops, community facilities, schools and the railway stations, will be supported C. Development proposals requiring the preparation and agreement of travel plans as planning conditions or obligations, are required to prioritise in their travel interventions the making of financial contributions to footpath and cycleway	No Likely Significant Effects This is a development management policy linking travel improvements to development. It does not include the location, type, or extent of development.

Policy Name	Policy summary (full policy details can be found in the NP document)	Potential Likely Significant Effect?
	improvement projects connecting their schemes local services and facilities, including strategic allocations in the GBC Local Plan (2016 – 2036 or subsequent version). D. Development proposals that will result on the unnecessary loss or obstruction of a section of cycleway or footway, that cannot be satisfactorily mitigated, will be resisted.	There are no impact pathways present.

Strategic Environmental Assessment for the Ash Neighbourhood Plan

Environmental Report to
accompany the Regulation 14
version of the Neighbourhood
Plan

Ash Parish Council

June 2025

Quality Information

Prepared by	Checked by	Verified by	Approved by
A.V.	R.P.	N.C.B.	N.C.B.
Environmental Consultant	Principal Planner	Technical Director	Technical Director

Revision History

Revision	Revision Date	Details	Name	Position
V1.0	June 2025	Initial version for Neighbourhood Group comment	L.C.	Planning and Development Manager
V2.0	June 2025	Consultation version	R.P.	Principal Planner

Prepared for:

Ash Parish Council

Prepared by:

3 Rivergate
Temple Quay
Bristol
BS1 6ER

aecom.com

© 2025 AECOM Limited. All Rights Reserved.

This document has been prepared by AECOM Limited ('AECOM') in accordance with its contract with the Client and in accordance with generally accepted consultancy principles, the budget for fees and the terms of reference agreed between AECOM and the Client. Any information provided by third parties and referred to herein has not been checked or verified by AECOM, unless otherwise expressly stated in the document. AECOM shall have no liability to any third party that makes use of or relies upon this document.

Cover image: The Hog's Back near Aldershot, England, UK

Table of Contents

Non-Technical Summary	i
1. Introduction	1
2. Local Plan Context and Vision for the Neighbourhood Plan	6
3. What is the Scope of the SEA?	9
4. Consideration of Reasonable Alternatives Through the SEA	14
5. Appraisal of the Regulation 14 Version of the Neighbourhood Plan...	25
6. Next Steps	34

Non-Technical Summary

Introduction

AECOM has been commissioned to undertake an independent Strategic Environmental Assessment (SEA) in support of the emerging Ash Neighbourhood Plan (ANP).

SEA is a mechanism for considering and communicating the potential impacts of an emerging plan, and potential alternatives in terms of key environmental issues. The aim of SEA is to inform and influence the plan-making process with a view to avoiding and mitigating potential negative impacts and maximising the potential for positive effects. Through this approach, the SEA for the ANP seeks to maximise the emerging plan's contribution to sustainable development.

Two key procedural requirements of the SEA Regulations are that:

- I. When deciding on '*the scope and level of detail of the information*' which must be included in the Environmental Report there is a consultation with nationally designated authorities concerned with environmental issues; and
- II. A report (the 'Environmental Report') is published for consultation alongside the draft plan (i.e., the draft ANP) that presents outcomes from the environmental assessment (i.e., discusses 'likely significant effects' that would result from plan implementation) and reasonable alternatives.

This 'Environmental Report' is concerned with item 'ii' above.

Local Plan context

The relevant Local Plan for the neighbourhood area¹ is the Guildford Local Plan (GLP) (Parts 1 and 2). Ash has been given a housing allocation of 339 in the GLP - this includes 44 allocated to the neighbourhood area and a portion of the 885 to come forward across Ash and Tongham combined.

The housing position for the authority area is likely to be influenced by 1) the increased housing numbers for the borough as outlined by the revised standard method in the latest NPPF, and 2) the absence of a five-year housing land supply in the borough as outlined in the Council's latest position statement (dated 1st April 2025). This may lead to an increased number of housing allocations in Ash in the emerging Local Plan.

¹ Guildford Borough Council (no date). '*Guildford Local Plan*' can be accessed through [this link](#).

Consideration of reasonable alternatives

In accordance with the SEA Regulations the Environmental Report must include...

- I. An outline of the reasons for selecting the alternatives dealt with; and
- II. The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting the preferred approach in light of alternatives appraised.

Strategic factors

The ANP adopts a 'brownfield first' strategy, prioritising the redevelopment of previously developed land within the neighbourhood area. This approach reflects both a sustainable planning ethos and the practical constraints of site availability. While brownfield opportunities are limited, the ANP seeks to maximise their potential through policies that support demolition and redevelopment, ensuring that any new development is well-integrated into the existing built environment. To guide this process, a Design and Development Code (DDC) is being prepared, which will help shape the form, scale, and character of future proposals.

Much of the undeveloped land surrounding Ash is constrained by international and national biodiversity designations, as well as the Metropolitan Green Belt. Furthermore, a significant greenfield strategic allocation to the south of the neighbourhood area is already under construction and is expected to be retained in the Guildford Local Plan review. These constraints limit the scope for greenfield development and reinforce the need to protect the remaining open countryside.

Therefore, a key element of the ANP is the introduction of a 'local gap' policy. This policy aims to preserve the physical and visual separation between the three key settlements of Ash, Ash Green, and Tongham. The surrounding countryside has experienced considerable development pressure in recent years, particularly around Tongham, which lies just beyond the neighbourhood area boundary. This area, while not within the Green Belt or the Surrey Hills National Landscape, remains highly sensitive. Guildford Borough Council's Rural Urban Fringe Character Assessment² highlights the vulnerability of this landscape, supporting the case for a policy that maintains openness and prevents coalescence between settlements.

Options assessment

While the ANP does not propose to allocate specific sites, it must still consider the implications of key local issues which are of central importance to plan making.

In light of the strategic factors outlined above, the reasonable alternatives will focus on policy direction rather than site-specific growth scenarios. A particular area of interest is where to formally establish a 'local gap' policy. As such, the SEA has considered the relative sustainability merits of proposing a local gap at two potential locations within the neighbourhood area.

² Guildford Borough Council (2007). 'Guildford Landscape Character Assessment & Guidance' can be accessed through [this link](#).

They are as follows:

- I. Option A: Propose a local gap on land to the north of the disused railway.
- II. Option B: Propose a local gap on land to the south of the disused railway.

Figure 4-1 in the main body of the Environmental Report visually presents these two options, with the detailed assessment findings presented in **Table 4.1** to **Table 4.8**.

Summary of assessment findings

SEA Theme		Option A	Option B
Biodiversity	Rank	2	1
	Significant?	No	No
Climate Change	Rank	2	1
	Significant?	No	No
Community Wellbeing	Rank	2	1
	Significant?	No	No
Historic Environment	Rank	1	2
	Significant?	Yes - beneficial	No
Landscape	Rank	2	1
	Significant?	No	No
Land, Soil and Water Resources	Rank	=1	=1
	Significant?	No	No
Transportation	Rank	2	1
	Significant?	No	No

Option A is assessed as performing more favourably in relation to the **Historic Environment** SEA theme. Its designation as a settlement gap offers potential for significant beneficial effects with regard to the protection of the setting of listed buildings, offering a more direct opportunity to support local heritage. Option B, by comparison, is considered to have lower sensitivity in this regard and does not provide the same level of heritage-related benefit.

Option B is considered to perform more favourably across the majority of SEA themes. In terms of the **Biodiversity** SEA theme, it presents greater potential for

ecological protection and enhancement, particularly if safeguarded from incompatible uses. For the **Climate Change (Including Flood Risk)** SEA theme, the presence of areas at higher risk of surface water flooding supports its role in natural flood management and climate mitigation. Regarding the **Community Wellbeing** SEA theme, Option B offers wider informal countryside access, which may support physical and mental health and help reduce pressure on more sensitive areas. In the context of the **Landscape** SEA theme, its size and location between settlements are seen as more effective in maintaining separation and reducing the risk of coalescence, with additional value due to its proximity to the AGLV. Finally, for the **Transport** SEA theme, Option B benefits from an existing network of public rights of way and footpaths, which supports sustainable travel and recreational use.

In relation to the **Land, Soil, and Water Resources** SEA theme, both options are assessed as performing similarly. Neither presents notable constraints or opportunities in terms of soil quality, contamination, or water resource management, but both contribute positively to maintaining soil functions and water-related features.

Developing the preferred approach for the ANP

The preferred Local Gap for the purposes of ANP policy is **Option A**, primarily due to the significant beneficial effects the local gap will have on conserving the historic setting of Ash Manor and other designated historic assets.

Although Option B performs more strongly across a broader range of SEA themes, the specific heritage value associated with Option A is a key consideration in this decision. The contribution of this area to the setting of Ash Manor is recognised as a locally important factor. Additionally, Option B has recently been designated as a Suitable Alternative Natural Greenspace (SANG) to account for the significant growth coming forward at the strategic allocation in Tongham (to the south of the neighbourhood area). As the site already benefits from protection, it is less-suited for a local gap proposal through the ANP.

The preferred approach has been informed by the various surveys and evidence base documents prepared to support the Neighbourhood Plan, responses from community consultation events, and the SEA findings.

Appraisal of the Regulation 14 version of the Neighbourhood Plan

To support the implementation of the vision statement for the ANP, the Regulation 14 version of the plan puts forward 13 policies to guide new development within the neighbourhood area. Chapter 5 in the main body of the Environmental Report presents the detailed appraisal findings and recommendations in relation to the Regulation 14 version of the ANP. A summary of the appraisal findings are presented below.

The ANP is anticipated to result in **beneficial effects across all SEA themes**, with significant beneficial effects anticipated for **Biodiversity, Community Wellbeing, Historic Environment, Landscape**, and **Transportation**. These benefits are supported by a combination of spatial planning, design-led policies, protection of local assets, and promotion of sustainable travel and infrastructure. No significant adverse effects are anticipated from policies in the ANP.

While the ANP policies are expected to lead to beneficial effects, the SEA identifies opportunities to further strengthen their effectiveness. The following recommendations are offered for consideration by plan makers to inform policy development:

- I. Supporting the provision of healthcare and social care facilities, to address the needs of an ageing population;
- II. Encouraging natural drainage solutions in all new developments would ensure effective management of surface water runoff, mitigating flood risk in the neighbourhood area;
- III. Encouraging the adoption of water efficiency measures, including rainwater harvesting and greywater reuse, are recommended to promote sustainable water resource management; and
- IV. Encouraging the use of low-emission and electric vehicles, alongside the provision of appropriate charging infrastructure in new developments, would support the transition to cleaner transportation and contribute to local and national emissions reduction targets.

Next steps

Plan finalisation

Following Regulation 14 consultation, responses will be considered in finalising the ANP and SEA for submission. Following submission, the ANP and supporting evidence will be published for further consultation, and then subjected to Independent Examination. At Independent Examination, the ANP will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the Local Plan.

If the examination leads to a favourable outcome, the ANP will then be subject to a referendum, organised by Guildford Borough Council. If more than 50% of those who vote agree with the ANP, then it will be 'made'. Once 'made', the ANP will become part of the Development Plan for Guildford, covering the defined neighbourhood area.

Monitoring

The SEA regulations require 'measures envisaged concerning monitoring' to be outlined in this report. This refers to the monitoring of likely significant effects of the Neighbourhood Plan to identify any unforeseen effects early and take remedial action as appropriate.

It is anticipated that monitoring of effects of the ANP will be undertaken by Guildford Council as part of the process of preparing its Annual Monitoring Report (AMR). No significant negative effects are considered likely in the implementation of the ANP that would warrant more stringent monitoring over and above that already undertaken by Guildford Borough Council.

This page is intentionally blank

1. Introduction

1.1. Background

- 1.1.1. AECOM has been commissioned to undertake an independent Strategic Environmental Assessment (SEA) in support of the emerging Ash Neighbourhood Plan (ANP).
- 1.1.2. The ANP is being prepared under the Localism Act 2011³ and the Neighbourhood Planning (General) Regulations 2012,⁴ and in the context of the Guildford Local Plan.⁵
- 1.1.3. The Ash neighbourhood area (**Figure 1-1**) was designated in April 2024.

Table 1-1: Key information relating to the Ash Neighbourhood Plan

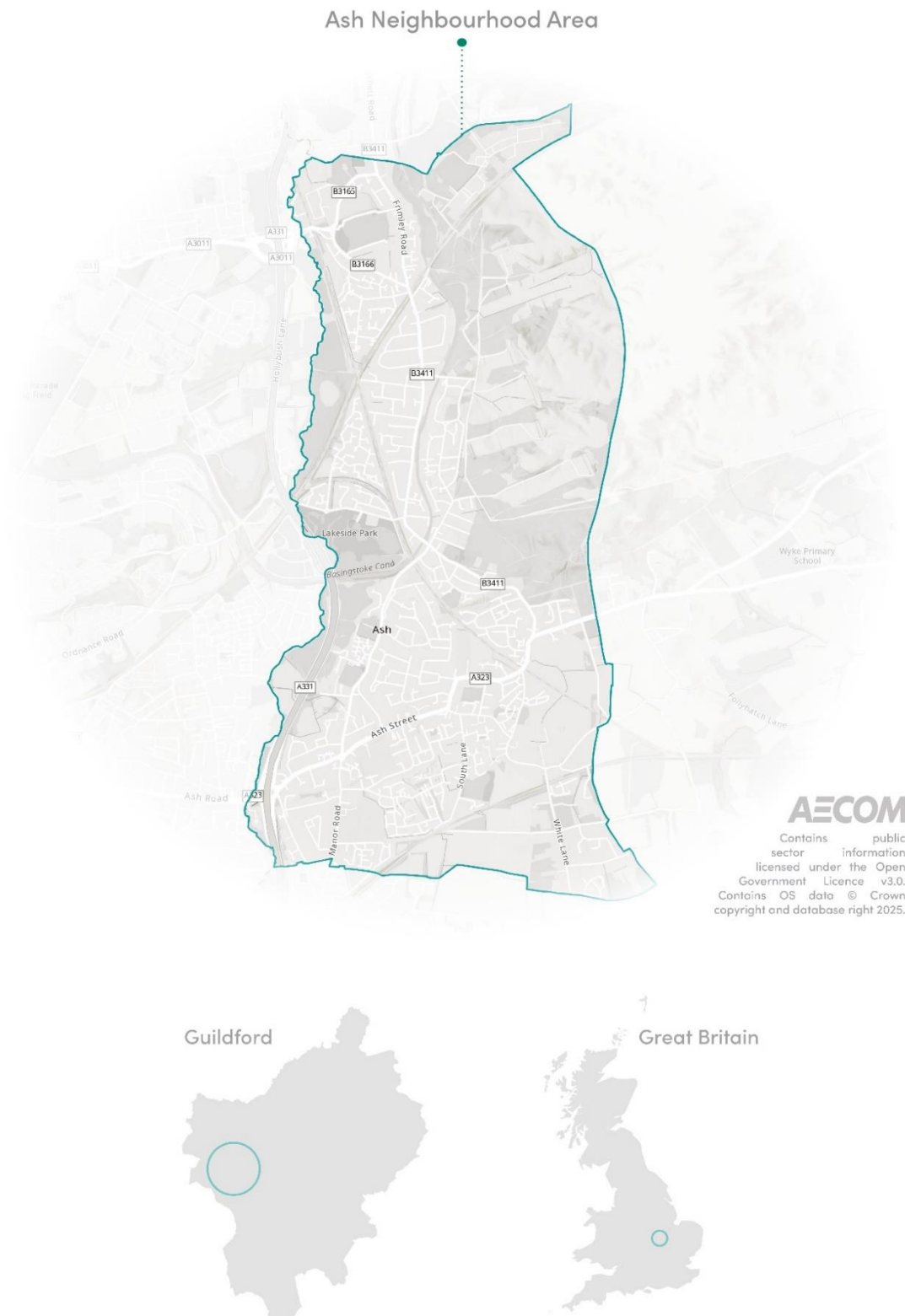
Name of Responsible Authority	Guildford Borough Council
Title of the Plan	Ash Neighbourhood Plan (“the ANP”)
Subject	Neighbourhood planning
Purpose	The ANP is being prepared as a neighbourhood plan under the Localism Act 2011 and Neighbourhood Planning (General) Regulations 2012, and in the context of the Guildford Local Plan (2019 and 2023). The ANP will be used to guide and shape development within the neighbourhood area.
Timescale	The plan period is expected to cover a period of at least 15 years (from adoption).
Area covered by the plan	The neighbourhood area covers the civil parish of Ash, located in Guildford (Surrey).
Summary of content	The ANP will set out a vision, strategy, and range of policies for the neighbourhood area.

³ UK Government (2011) ‘*Localism Act 2011*’ can be accessed through [this link](#).

⁴ UK Government (2012) ‘*The Neighbourhood Planning (General) Regulations 2012*’ can be accessed through [this link](#)

⁵ Guildford Borough Council Local Plan. Part 1 (2019) can be accessed through [this link](#). Part 2 (2023) can be accessed through [this link](#).

Figure 1-1: Ash Neighbourhood Area



1.2. SEA Screening

- 1.2.1. A Neighbourhood Plan requires SEA where it is likely to have significant environmental effects. In this respect, neighbourhood plans are more likely to be screened in as requiring an SEA if both the following apply:
- the neighbourhood plan is being prepared within a neighbourhood area with significant environmental constraints, such as, for example, sites of international or national importance for biodiversity conservation, or large concentrations of heritage assets; and
 - the neighbourhood plan is likely to allocate sites for development.⁶
- 1.2.2. The ANP was screened by Guildford Borough Council in 2024. The screening process is based upon consideration of standard criteria to determine whether the ANP is likely to have “*significant environmental effects*”, and subsequently whether there is a need for SEA. While the ANP is not intending to allocate sites for development, the screening concluded that an SEA (and Habitats Regulation Assessment [HRA]) is still required due to the presence of designated sites of international importance (including Special Areas of Conservation and Special Protection Areas).
- 1.2.3. In light of this outcome, an SEA process is being undertaken to meet the specific requirements prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations).⁷

1.3. SEA Explained

- 1.3.1. SEA is a mechanism for considering and communicating the potential impacts of an emerging plan, and potential alternatives in terms of key environmental issues. The aim of SEA is to inform and influence the plan-making process with a view to avoiding and mitigating potential negative impacts and maximising the potential for positive effects. Through this approach, the SEA for the ANP seeks to maximise the emerging plan’s contribution to sustainable development.

⁶ DLUHC (February 2022): Chief Planner’s Newsletter, February 2022. ‘*Strategic Environmental Assessment for Neighbourhood Plans: Timely and effective screening*’ is available through [this link](#).

⁷ UK Government (2004) ‘*The Environmental Assessment of Plans and Programmes Regulations 2004*’ can be accessed [here](#).

- 1.3.2. Two key procedural requirements of the SEA Regulations are that:
- i. When deciding on '*the scope and level of detail of the information*' which must be included in the Environmental Report there is a consultation with nationally designated authorities concerned with environmental issues; and
 - ii. A report (the 'Environmental Report') is published for consultation alongside the draft plan (i.e., the draft ANP) that presents outcomes from the environmental assessment (i.e., discusses 'likely significant effects' that would result from plan implementation) and reasonable alternatives.
- 1.3.3. This 'Environmental Report' is concerned with item 'ii' above.

1.4. Structure of this Environmental Report

- 1.4.1. This SEA Report incorporates the information required for Environmental Reports by the SEA Regulations. The information presented in this IIA Report is outlined in **Table 1-2**.

Table 1-2: Questions that Must be Answered by the SEA Environmental Report to Meet the Regulatory⁸ Requirements

Environmental Report question	In line with the SEA Regulations, the report must include... ⁹
What is the plan seeking to achieve?	An outline of the contents and main objectives of the plan.
What is the scope of the SEA?	Relationship with other relevant plans and programmes.
What is the sustainability 'context'?	The relevant environmental protection objectives , established at international or national level. Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.

⁸ Environmental Assessment of Plans and Programmes Regulations 2004

⁹ NB this column does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation.

Environmental Report question	In line with the SEA Regulations, the report must include... ⁹
What is the sustainability 'baseline'?	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan. The environmental characteristics of areas likely to be significantly affected. Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.
What are the key issues and objectives?	Key problems/issues and objectives that should be a focus of (i.e., provide a 'framework' for) assessment.
What has plan-making/SEA involved up to this point?	Outline reasons for selecting the alternatives dealt with. The likely significant effects associated with alternatives. Outline reasons for selecting the preferred approach in-light of alternatives appraisal/a description of how environmental objectives and considerations are reflected in the current version of the plan.
What are the assessment findings at this stage?	The likely significant effects associated with the Regulation 14 version of the plan. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the Regulation 14 version of the plan.
What happens next?	The next steps for the plan making / SEA process.

2. Local Plan Context and Vision for the Neighbourhood Plan

2.1. Local Plan Context for the Neighbourhood Plan

- 2.1.1. The National Planning Policy Framework (NPPF) provides an overarching framework for development in England. It sets out the government's planning policies for England and how these are expected to be applied. It is supported by planning practice guidance, which is a suite of policy papers covering a broad range of topics, including SEA.
- 2.1.2. The relevant Local Plan for the neighbourhood area¹⁰ is the Guildford Local Plan (GLP) (Parts 1 and 2). Ash has been given a housing allocation of 339 in the GLP - this includes 44 allocated to the neighbourhood area and a portion of the 885 to come forward across Ash and Tongham combined.
- 2.1.3. Guildford Borough Council are in the process of undertaking a review of the adopted Local Plan, however progress is in the early stages. An updated Local Development Scheme (LDS)¹¹ was published in February 2025, with evidence gathering underway. Consultation on the draft Local Plan (Regulation 18) is scheduled for September 2026.
- 2.1.4. The revised National Planning Policy Framework (NPPF) has now been published following the consultation period that ended in September 2024. The new framework includes significant reforms aimed at boosting housing supply and supporting sustainable growth. One of the key changes is the reintroduction of mandatory housing targets, which now require an increased number of dwellings in Guildford. The housing position for the authority area is likely to be influenced by 1) the increased housing numbers for the borough as outlined by the revised standard method in the latest NPPF, and 2) the absence of a five-year housing land supply in the borough as outlined in the Council's latest position statement (dated 1st April 2025). This may lead to an increased number of housing allocations in Ash in the emerging Local Plan.

¹⁰ Guildford Borough Council (no date). 'Guildford Local Plan' can be accessed through [this link](#).

¹¹ Guildford Borough Council (2025): [Local Development Scheme](#)

- 2.1.5. Neighbourhood plans will form part of the development plan for Guildford, alongside, but not as a replacement for, the Local Plan. Neighbourhood plans are required to be in general conformity with the Local Plan and can develop policies and proposals to address local place-based issues. In this way it is intended for the Local Plan to provide a clear overall strategic direction for development in Guildford, whilst enabling finer detail to be determined through the neighbourhood planning process where appropriate.

2.2. Vision and Objectives for the ANP

- 2.2.1. The vision for the ANP captures the community's views and aspirations for the neighbourhood area as expressed through the neighbourhood planning process. It forms the basis on which the neighbourhood objectives and proposed policies have been formulated.

- 2.2.2. The vision is as follows:

“The vision of Ash in 2045 is for the Parish to maintain its strong identity on Surrey’s western border. The Parish of Ash is made up of three areas, Ash Vale to the north, Ash in the centre and Ash Green in the southeast. Over the next twenty years of this document’s life span, the intention is for the Parish of Ash to remain a vibrant, sustainable community featuring housing, employment, retail and leisure facilities, and improved infrastructure for its residents and the residents of the neighbouring towns and villages. The vision also seeks to retain Ash Green’s identity as an independent village, separate from the Ash and Tongham built-up area that contains Ash and Ash Vale.

“These steps will be done by protecting the existing green spaces and recreational facilities, identifying land for new community facilities to be created and focus on a development policy that targets balanced redevelopment over new constructions on greenfield land. The intention of the Neighbourhood Plan is to both protect and guide Ash in that manner as it continues to develop towards 2045.”

- 2.2.3. The vision is accompanied by the following five plan objectives:

- To retain and enhance the individual identity of each settlement in the parish and prevent coalescence between Ash Green and Ash;
- To protect and enhance the natural environment;
- To increase the number of commuting trips by rail, bus, cycling and walking;

- To increase the capacity of social infrastructure, protect local facilities, promote local employment opportunities, shops and services; and
- To increase the health and wellbeing of residents through provision of more recreational activities and making it easier to get around the parish on foot and by cycle.

2.2.4. The ANP contains thirteen policies, each of which is intended to contribute to one or more of these objectives.

3. What is the Scope of the SEA?

3.1. Summary of SEA Scoping

- 3.1.1. A Scoping Report was prepared for the SEA in April 2025. The purpose of this report was to outline the 'scope' of the SEA through setting out:
- A context review of the key environmental and sustainability objectives of national, regional, and local plans and strategies relevant to the ANP;
 - Baseline data against which the ANP can be assessed;
 - The key sustainability issues for the ANP; and
 - An 'SEA Framework' of objectives and assessment questions.
- 3.1.2. Baseline information (including the context review and key issues) are available to view in the SEA Scoping Report, available to access alongside the ANP at Regulation 14 consultation.
- 3.1.3. The SEA Regulations require that: *'When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies'*. In England, the consultation bodies are Natural England, the Environment Agency, and Historic England.¹² These authorities were consulted on the scope of the SEA for a period of five weeks between April and May 2025.
- 3.1.4. Only one response was to the Scoping Report consultation was received. It came from Natural England on 04.06.2025, and they did not provide any specific comments on the scope of the SEA.

SEA Framework

- 3.1.5. The SEA Framework provides a way in which environmental effects can be defined and subsequently analysed based on standard 'tests'. Each proposal within the current version (i.e., the Regulation 14 version) of the ANP will be assessed consistently using the framework.
- 3.1.6. The updated SEA Framework is presented in **Table 3-1**.

¹² In-line with Article 6(3) of the SEA Directive, these consultation bodies were selected because *'by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programme'*.

Table 3-1: SEA Framework for the ANP

SEA Theme	SEA Objective	Supporting Questions (Will the Option/ Proposal Help to...)
Biodiversity	Maintain and enhance the extent and quality of biodiversity habitats and networks within and surrounding the neighbourhood area.	• Protect and enhance nationally, and locally designated sites, including supporting habitats and mobile species that are important to the integrity of these sites? • Protect and enhance priority habitats and the links between them? • Achieve a net gain in biodiversity, perhaps over and above national BNG standards (where possible)? • Support habitat restoration or new habitat creation within the identified Network Enhancement or Expansion Zones? • Support enhancements to multifunctional green infrastructure networks and the network of open spaces?
Climate Change (including Flood Risk)	Reduce the contribution to climate change made by activities in the neighbourhood area.	• Promote the use of sustainable modes of transport, including walking, cycling and public transport? • Improve or extend local footpaths, cycle paths or strategic green infrastructure routes? • Increase the number of new development meeting or exceeding sustainable design criteria? • Generate energy from low or zero carbon sources? • Support the transition to electric vehicles?
	Support the resilience of the neighbourhood area to the potential effects of climate	• Avoid inappropriate development in areas at risk of flooding, considering the likely future effects of climate change? • Improve and extend green infrastructure networks in the neighbourhood area? • Sustainably manage water runoff? • Increase the resilience of the local built and natural environment?

SEA Theme	SEA Objective	Supporting Questions (Will the Option/ Proposal Help to...)
	change, including flood risk.	• Ensure the potential risks associated with climate change are duly considered in the design of new development in the neighbourhood area?
Community Wellbeing	Ensure growth in the neighbourhood area is aligned with the needs of all residents and in suitably connected places, supported by the appropriate and timely provision of infrastructure to enable cohesive and inclusive communities.	• Provide everyone with the opportunity to live in good quality and affordable housing? • Support the provision of a range of house types and sizes targeted at aligning the housing stock with local needs? • Provide flexible and adaptable homes that meet people's changing needs? • Improve the availability and/ or accessibility of local services and facilities? • Improve the availability and/ or accessibility of education? • Contribute to improving aspects of deprivation in the neighbourhood area? • Maintain or enhance the quality of life of existing and future residents? • Promote access to green spaces and recreational areas in Ash?
Historic Environment	Protect, conserve and enhance the historic environment within and surrounding the neighbourhood area.	• Conserve and enhance buildings and structures of architectural or historic interest, both designated and non-designated, and their settings? • Conserve and enhance the special interest, character and appearance of locally important features and their settings? • Protect the integrity of the Conservation Area and its setting? • Protect the integrity of the historic setting of key monuments of cultural heritage interest as listed in the Surrey HER?

SEA Theme	SEA Objective	Supporting Questions (Will the Option/ Proposal Help to...)
		- Support the undertaking of early archaeological investigations and, where appropriate, recommend mitigation strategies? - Support access to, interpretation and understanding of the special qualities and significance of the neighbourhood area?
Landscape	Protect and enhance the character and quality of the immediate and surrounding landscape, including green infrastructure corridors.	- Protect and/ or enhance the integrity and setting of the Surrey Heaths National Landscape and AGLV? - Protect and/or enhance the integrity of the Ash's two NCAs, and four LCTs? - Protect and/ or enhance local landscape and villagescape character and quality of place? - Conserve and enhance local identity, diversity, and settlement character? - Identify and protect locally important viewpoints which contribute to character and sense of place? - Protect and extend/ enhance green infrastructure corridors? - Protect visual amenity? - Retain and enhance landscape and villagescape features that contribute to the rural setting, including trees and hedgerows?
Land, Soil, and Water Resources	Ensure the efficient and effective use of land, and protect and enhance water quality, using water resources in a sustainable manner.	- Avoid the loss of higher quality agricultural land resources? - Support sustainable resource consumption and waste management? - Promote any opportunities for the use of previously developed land, or vacant / underutilised land? - Avoid impacts on water quality? - Support improvements to water quality? - Ensure appropriate drainage and mitigation is delivered alongside development? - Protect the neighbourhood area's waterbodies? - Maximise water efficiency and opportunities for water harvesting and/ or water recycling?

SEA Theme	SEA Objective	Supporting Questions
		(Will the Option/ Proposal Help to...)
Transportation	Promote sustainable transport use and reduce the need to travel.	• Support the objectives within the Surrey Local Transport Plan 4 to encourage the use of more sustainable transport modes? • Encourage opportunities to enhance connectivity and accessibility within the neighbourhood area, including through the uptake of active travel opportunities? • Extend or improve active travel networks? • Facilitate working from home to reduce the use of private vehicles to access workplaces outside of the neighbourhood area? • Reduce the impact of the transport sector on climate change? • Improve road safety?

4. Consideration of Reasonable Alternatives Through the SEA

4.1. Introduction

4.1.1. In accordance with the SEA Regulations the Environmental Report must include...

- An outline of the reasons for selecting the alternatives dealt with; and
- The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting the preferred approach in light of alternatives appraised.

4.1.2. The 'narrative' of plan-making / SEA up to this point is told within this part of the Environmental Report. Specifically, how the SEA process to date has informed the consideration of different approaches for key elements of the ANP.

4.2. Defining Reasonable Alternatives

4.2.1. Whilst work on the ANP has been underway for some time, the aim of this section is not to provide a comprehensive explanation of work to date, but rather to explain work undertaken to develop and appraise reasonable alternatives.

4.2.2. In the context of the above, this chapter of the Environmental Report presents information on reasonable alternative approaches to addressing key issues that are of central importance to the ANP.

Strategic factors informing the preferred approach

4.2.3. The ANP adopts a 'brownfield first' strategy, prioritising the redevelopment of previously developed land within the neighbourhood area. This approach reflects both a sustainable planning ethos and the practical constraints of site availability. While brownfield opportunities are limited, the ANP seeks to maximise their potential through policies that support demolition and redevelopment, ensuring that any new development is well-integrated into the existing built environment. To guide this process, a Design and Development Code (DDC) is being prepared, which will help shape the form, scale, and character of future proposals.

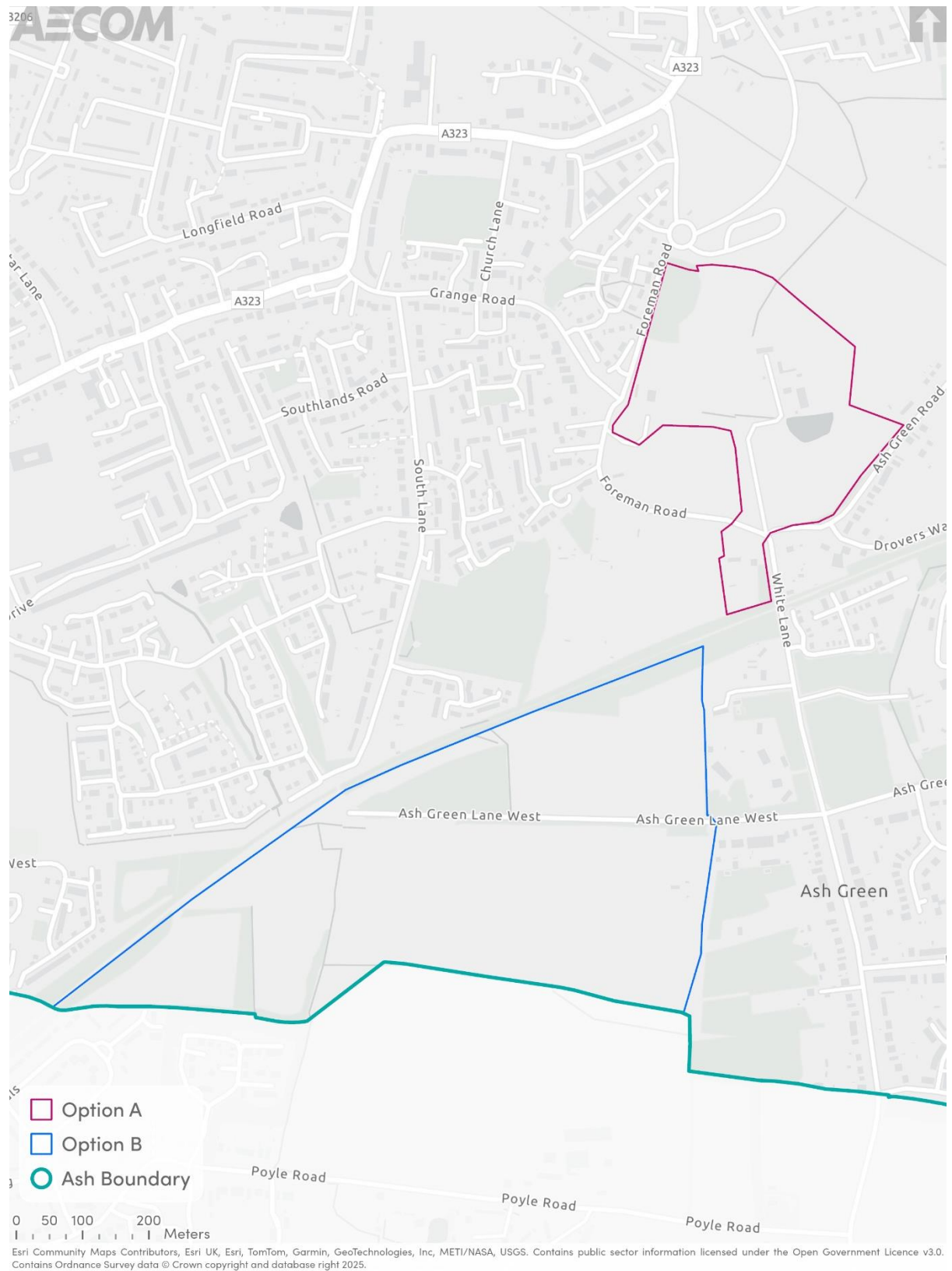
- 4.2.4. Much of the undeveloped land surrounding Ash is constrained by international and national biodiversity designations, as well as the Metropolitan Green Belt. Furthermore, a significant greenfield strategic allocation to the south of the neighbourhood area is already under construction and is expected to be retained in the Guildford Local Plan review. These constraints limit the scope for greenfield development and reinforce the need to protect the remaining open countryside.
- 4.2.5. Therefore, a key element of the ANP is the introduction of a 'local gap' policy. This policy aims to preserve the physical and visual separation between the three key settlements of Ash, Ash Green, and Tongham. The surrounding countryside has experienced considerable development pressure in recent years, particularly around Tongham, which lies just beyond the neighbourhood area boundary. This area, while not within the Green Belt or the Surrey Hills National Landscape, remains highly sensitive. Guildford Borough Council's Rural Urban Fringe Character Assessment¹³ highlights the vulnerability of this landscape, supporting the case for a policy that maintains openness and prevents coalescence between settlements.

Consideration of Potential Options

- 4.2.6. While the ANP does not propose to allocate specific sites, it must still consider the implications of key local issues which are of central importance to plan making.
- 4.2.7. In light of the strategic factors outlined above, the reasonable alternatives will focus on policy direction rather than site-specific growth scenarios. A particular area of interest is where to formally establish a 'local gap' policy. As such, the SEA has considered the relative sustainability merits of proposing a local gap at two potential locations within the neighbourhood area. They are as follows:
- Option A: Propose a local gap on land to the north of the disused railway.
 - Option B: Propose a local gap on land to the south of the disused railway.
- 4.2.8. Figure 4-1 **Figure 4-1** visually presents these two options.

¹³ Guildford Borough Council (2007). 'Guildford Landscape Character Assessment & Guidance' can be accessed through [this link](#).

Figure 4-1: Reasonable alternatives considered through the SEA



Appraisal Findings

- 4.2.9. Utilising the SEA Framework of objectives and assessment questions developed during the earlier scoping stage of the SEA, the appraisal has been presented through seven SEA Themes, as follows:
- Biodiversity;
 - Climatic Change (Including Flood Risk);
 - Community Wellbeing;
 - Historic Environment;
 - Landscape;
 - Land, Soil and Water Resources; and
 - Transportation.
- 4.2.10. The appraisal considers the relative sustainability merits of each of the two local gap options. Findings are presented as a commentary on effects. To support the appraisal findings, the options have been ranked in terms of their sustainability performance against the relevant SEA Theme. It is anticipated that this will provide the reader with a likely indication of the relative performance of the two options in relation to each theme considered.
- 4.2.11. **Table 4-1 to Table 4-8** below present the findings of the appraisal of the two local gap options for each of the SEA themes.

Table 4-1: Appraisal Findings (Biodiversity)

Discussion of Potential Effects and Relative Merits of Options	Rank of Preference	
	A	B
Option A includes a relatively small extent of priority habitat, consisting of some deciduous woodland and a traditional orchard. While it lies within a Nature Recovery Network Enhancement Zone (Zone 1), suggesting potential for habitat creation or enhancement, the overall biodiversity value of this option is moderate. Option A does not contain any statutory or non-statutory designated wildlife sites. As such, the potential ecological benefits from its protection would be minor.	2	1
Option B contains a significantly larger area of priority habitat (all deciduous woodland) than Option A and encompasses a Site of Nature Conservation Importance (SNCI). These features indicate a higher baseline ecological value and make the area more sensitive to development pressures. Like Option A, it also falls within Network Enhancement Zone 1, further increasing its importance for nature recovery and connectivity. Limiting development in the Option B site would safeguard a larger, and more ecologically sensitive, area from development.		

Table 4-2: Appraisal Findings (Climate Change [Including Flood Risk])

Discussion of Potential Effects and Relative Merits of Options	Rank of Preference	
	A	B
Both Option A and Option B offer opportunities to support climate change objectives, particularly by preventing development and maintaining open, undeveloped land. The key differentiator between the two options lies in their exposure to flood risk. While Option A is largely unaffected by surface water flood risk, Option B contains a significant area of high surface water flood risk along its northern boundary. This makes Option B more appropriate for designation as a Local Gap, as it aligns with climate adaptation policy by discouraging development in an area already vulnerable to climate-related impacts such as intense rainfall events.	2	1
Although woodland is present in both options, Option B includes a larger area. Protecting more woodland could provide greater benefits for climate change mitigation, such as increased carbon sequestration and improved climate regulation. The existing tree cover and undeveloped condition of the land may also help reduce surface runoff and support natural flood management, particularly in areas already identified as being at risk, as is the case in Option B.		

Table 4-3: Appraisal Findings (Community Wellbeing)

Discussion of Potential Effects and Relative Merits of Options	Rank of Preference	
	A	B
The designation of a Local Gap at either option would contribute to settlement separation, which supports community wellbeing by helping to preserve local identity, limit coalescence, and maintain the character of the surrounding environment. These attributes can positively affect residents' sense of place and attachment to their neighbourhood.	2	1
Regarding community uses, Option A includes The Briars playground, providing a local, formal space for family activity and play. This delivers a direct recreational benefit to this area, especially for young children. Option B includes Ash Green Meadows, a locally valued green space that forms part of a SNCI and incorporates Bin Wood and surrounding fields. This area supports informal, countryside-based recreation, with family-friendly and dog-walking circular routes. These routes provide outdoor experiences, which can benefit mental health and general wellbeing. Importantly, the use of this area for everyday recreation also plays a strategic role in helping to reduce pressure on sensitive heathland habitats elsewhere.		

Table 4-4: Appraisal Findings (Historic Environment)

Discussion of Potential Effects and Relative Merits of Options	Rank of Preference	
	A	B
Option A includes one Grade II* and three Grade II listed buildings, indicating that the area has significant historic environment value, with its landscape contributing to the setting and significance of these buildings. As the primary purpose of the settlement gap is to restrict development and maintain open land between settlements, designating Option A as a Local Gap would provide a strong protective function. This would help safeguard the setting of the listed buildings by preventing development that could detract from their historic character and visual context.	1	2
Option B contains no designated heritage assets within or immediately adjacent to it, indicating a lower sensitivity from a historic environment perspective. Therefore, designating Option B as a Local Gap would not offer significant added protection to Ash's heritage assets.		

Table 4-5: Appraisal Findings (Landscape)

Discussion of Potential Effects and Relative Merits of Options	Rank of Preference	
	A	B
Option B is a slightly larger site and lies more directly between the two settlements, which strengthens its potential role in maintaining a clear physical and visual separation. Option B is also within 250 m to an Area of Great Landscape Value (AGLV), which increases its landscape importance, as any changes from development at this site could influence the character and setting of this designation. Option A, by comparison, is located around 800 m from the AGLV, reducing the likelihood of indirect landscape effects on the designation.	2	1
It is important to note that the designation of either option as a local gap will help to maintain the openness of the land between key settlements, safeguarding their special qualities and character.		

Table 4-6: Appraisal Findings (Land, Soil, and Water Resources)

Discussion of Potential Effects and Relative Merits of Options	Rank of Preference	
	A	B
Both Option A and Option B are characterised primarily as land predominantly in urban use, with no significant areas of agricultural land present. Neither option contains any designated waste management sites, brownfield land, or historic landfill areas. Both sites include drainage ditches, which play a role in managing surface water runoff and are typical features within the local landscape.	=1	=1
Although neither option includes high-quality agricultural land, soils in both areas continue to provide important ecosystem services such as water filtration, carbon storage, and support for vegetation, including the woodland present within Option B. Protecting these greenfield areas as settlement gaps helps to maintain these natural soil functions and prevents degradation from potential land use changes. The drainage ditches highlight the importance of conserving natural water management features to support local flood risk reduction and maintain water quality.		

Table 4-7: Appraisal Findings (Transportation)

Discussion of Potential Effects and Relative Merits of Options	Rank of Preference	
	A	B
Option A is closer to the main settlement of Ash and its amenities, making it more suitable for development from a transport perspective. Its proximity to Ash supports sustainable travel modes	2	1

such as walking and cycling to services and public transport, which would reduce reliance on private vehicles if development occurred there.

Option B includes two public rights of way routes and several local circular footpaths that provide important recreational and sustainable travel routes between the Ash and Ash Green. Designating Option B as a settlement gap would help protect these routes from development pressure, maintaining the openness and connectivity of the area. This aligns well with the purpose of the settlement gap (to restrict development in less suitable locations and safeguard key landscape and recreational features).

Summary of Appraisal Findings

4.2.12. The table below summarises the rankings of the options with regards to their relative performance in relation to each SEA Theme.

Table 4-8: Appraisal Findings

SEA Theme		Option A	Option B
Biodiversity	Rank	2	1
	Significant?	No	No
Climate Change	Rank	2	1
	Significant?	No	No
Community Wellbeing	Rank	2	1
	Significant?	No	No
Historic Environment	Rank	1	2
	Significant?	Yes - beneficial	No
Landscape	Rank	2	1
	Significant?	No	No
Land, Soil and Water Resources	Rank	=1	=1
	Significant?	No	No

SEA Theme		Option A	Option B
Transportation	Rank	2	1
	Significant?	No	No

- 4.2.13. Option A is assessed as performing more favourably in relation to the **Historic Environment** SEA theme. Its designation as a settlement gap offers potential for significant beneficial effects with regard to the protection of the setting of listed buildings, offering a more direct opportunity to support local heritage. Option B, by comparison, is considered to have lower sensitivity in this regard and does not provide the same level of heritage-related benefit.
- 4.2.14. Option B is considered to perform more favourably across the majority of SEA themes. In terms of the **Biodiversity** SEA theme, it presents greater potential for ecological protection and enhancement, particularly if safeguarded from incompatible uses. For the **Climate Change (Including Flood Risk)** SEA theme, the presence of areas at higher risk of surface water flooding supports its role in natural flood management and climate mitigation. Regarding the **Community Wellbeing** SEA theme, Option B offers wider informal countryside access, which may support physical and mental health and help reduce pressure on more sensitive areas. In the context of the **Landscape** SEA theme, its size and location between settlements are seen as more effective in maintaining separation and reducing the risk of coalescence, with additional value due to its proximity to the AGLV. Finally, for the **Transport** SEA theme, Option B benefits from an existing network of public rights of way and footpaths, which supports sustainable travel and recreational use.
- 4.2.15. In relation to the **Land, Soil, and Water Resources** SEA theme, both options are assessed as performing similarly. Neither presents notable constraints or opportunities in terms of soil quality, contamination, or water resource management, but both contribute positively to maintaining soil functions and water-related features.

4.3. Developing the Preferred Approach

Choice of Local Gap Taken Forward for the Purposes of the Neighbourhood Plan

- 4.3.1. The preferred Local Gap for the purposes of ANP policy is **Option A**, primarily due to the significant beneficial effects the local gap will have on conserving the historic setting of Ash Manor and other designated historic assets.
- 4.3.2. Although Option B performs more strongly across a broader range of SEA themes, the specific heritage value associated with Option A is a key consideration in this decision. The contribution of this area to the setting of Ash Manor is recognised as a locally important factor. Additionally, Option B has recently been designated as a Suitable Alternative Natural Greenspace (SANG) to account for the significant growth coming forward at the strategic allocation in Tongham (to the south of the neighbourhood area). As the site already benefits from protection, it is less-suited for a local gap proposal through the ANP.
- 4.3.3. The preferred approach has been informed by the various surveys and evidence base documents prepared to support the Neighbourhood Plan, responses from community consultation events, and the SEA findings.
- 4.3.4. Specifically, the Neighbourhood Plan states:

‘This designation is supported by decision notices and evidence from appeals to demonstrate that this buffer zone is in conformity with the intention of policy A31 and that the manorial complex at Ash Manor forms an important ensemble of historically and architecturally significant listed buildings. There is long-running consensus that the rural setting of these buildings is key to understanding and appreciating their significance. The area comprising part of the proposed Local Gap has been the subject of four unsuccessful planning applications since 2017, the latest being refused on heritage grounds at appeal in May 2022 [PINS Ref: APP/Y3615/W/21/3273305].

Further development within this area would harm the significance of the grade II listed manorial complex by eroding its rural setting and the historic and evidential significance derived from it.*

There is a clear change in the landscape character on the fringe between Ash Green to Ash from pastoral to urban. The former is defined by the GBC Landscape Character Assessment with field patterns and woodland, with

the latter being an urban townscape. The entrances to Ash Green are all bounded by fields on both sides of the approach to the village, emphasising the rural nature of its setting.

Ash Green is formed predominately by detached houses, mostly chalet style bungalows along White Lane and Ash Green Lane, with the occasional two storey dwelling. The Old Cross Tree Way estate has its own identity of chalet style house and bungalows, with pitched roofs, white cladding and open frontages. Ash Green Road forms the older part of the village with villa style houses dating from the 1890s/1900s, all of which have long narrow gardens at the rear with smaller frontages to the road.'

5. Appraisal of the Regulation 14 Version of the Neighbourhood Plan

5.1. Introduction

5.1.1. The aim of this chapter is to present appraisal findings and recommendations in relation to the Regulation 14 version of the ANP. This chapter presents:

- An appraisal of the current version (i.e., the Regulation 14 version) of the ANP under the seven SEA theme headings;
- Consideration of potential cumulative effects; and
- The overall conclusions at this current stage.

5.2. Ash Neighbourhood Plan Policies

5.2.1. To support the implementation of the vision statement for the ANP, the Regulation 14 version of the plan puts forward 13 policies to guide new development within the neighbourhood area. These are outlined in **Table 5-1**.

Table 5-1: Policies in the Ash Neighbourhood Plan

Policy Reference	Policy Name
ASH1	ASH1 Spatial Strategy
ASH2	ASH2 Design Principles in Ash
ASH3	ASH3 Design Principles in Ash Vale
ASH4	ASH4 Design Principles in Ash Green
ASH5	ASH5 Local Centres and Dispersed local shops.
ASH6	ASH6 Employment Locations
ASH7	ASH7 Replacement Dwellings
ASH8	ASH8 Housing Mix, Type and Tenure

Policy Reference	Policy Name
------------------	-------------

ASH9	ASH9 Existing and New Local Community Assets
------	--

ASH10	ASH10 Green and Blue Infrastructure
-------	-------------------------------------

ASH11	ASH11 Local Green Spaces
-------	--------------------------

ASH12	ASH12 Thames Basin Heath SPA
-------	------------------------------

ASH13	ASH13 Active Travel
-------	---------------------

5.3. Approach to the Appraisal

- 5.3.1. For each theme, ‘significant’ effects of the Regulation 14 version of the ANP on the baseline are predicated and evaluated. Account is taken of the criteria presented within Schedule 2 of the Regulations. For example, account is taken of the probability, duration, frequency, and reversibility of the effects as far as possible. These effect ‘characteristics’ will be described within the assessment, as appropriate.
- 5.3.2. Every effort is made to identify / evaluate effects accurately; however, this is inherently challenging given the high-level nature of the ANP. The ability to predict effects accurately is also limited by understanding of the baseline and the nature of future planning applications. Because of the uncertainties involved, there is a need to exercise caution when identifying and evaluating significant effects to ensure all assumptions are explained. In many instances, given reasonable assumptions, it is not possible to predict ‘significant effects’, but it is possible to comment on merits (or otherwise) of the draft plan in more general terms.
- 5.3.3. Finally, it is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the SEA Regulations. For example, account is taken of the probability, duration, frequency, and reversibility of effects as far as possible. Cumulative effects are also considered, i.e., the potential for the ANP to impact an aspect of the baseline when implemented alongside other plans, programmes, and projects. These effect ‘characteristics’ are described within the assessment as appropriate.

5.4. Appraisal

Biodiversity

- 5.4.1. Given the proximity of the neighbourhood area to internationally designated sites for biodiversity and geodiversity, a Habitats Regulation Assessment (HRA) process has been completed for the Neighbourhood Plan. Providing any recommendations within the HRA are incorporated into the submission version of the ANP, it is anticipated that there would be no adverse effects to the integrity of these sites, either alone or in-combination with other plans and projects.
- 5.4.2. Of the ANP policies, ASH10 and ASH11 are the most directly relevant to biodiversity. ASH10 identifies a Green and Blue Infrastructure Network, comprising areas of ecological and recreational value, including woodland, heathland, meadows, watercourses, hedgerows and green corridors. The policy supports habitat retention and creation, improved connectivity, and long-term management through development contributions. It also encourages biodiversity adaptation to climate change, particularly through tree retention, increased canopy cover and the use of native species. These provisions are likely to have beneficial effects in terms of both biodiversity protection and enhancement.
- 5.4.3. ASH11 complements ASH10 by designating Local Green Spaces that are protected from development other than in very limited circumstances. While the policy focus is broader than ecology, these spaces may function as stepping stones for species movement, refuges for urban wildlife, or sites of local habitat interest.
- 5.4.4. Policy ASH12 addresses the potential impacts of residential development on the Thames Basin Heaths Special Protection Area (SPA). It ensures compliance with wider strategic mitigation requirements, including the provision of Suitable Alternative Natural Greenspace (SANG) or financial contributions. This approach is appropriate and avoids potential significant effects on designated sites.
- 5.4.5. Several other policies in the ANP provide indirect support for biodiversity through design and layout principles. For example, ASH4 encourages the retention of green buffers and the integration of new planting to support transitions between developed and rural areas. It also highlights the value of ecological connectivity in new development around Ash Green. Similarly, ASH7 includes expectations for biodiversity mitigation and enhancement in replacement dwellings, with explicit reference to net gain and the retention or creation of habitat features.

- 5.4.6. Policy ASH1 directs most development to the built-up areas of Ash and Ash Vale and restricts residential development within the 400 m buffer of the SPA. It also limits development in the countryside to uses that enhance the natural environment. This spatial strategy is likely to have a positive effect on biodiversity by reducing fragmentation and limiting encroachment into sensitive or undeveloped areas.

Climate Change (Including Flood Risk)

- 5.4.7. Policy ASH7 is anticipated to limit the carbon impact of replacement dwellings by requiring them to be 'zero-carbon ready' and to meet Passivhaus or equivalent standards. This approach includes a focus on lifecycle carbon analysis and post-occupancy evaluations, ensuring that buildings perform as designed in real conditions. Such policies are likely to deliver long-term carbon savings.
- 5.4.8. ASH10 also addresses climate adaptation by safeguarding and enhancing the green and blue infrastructure network. This policy promotes retention of existing trees and woodland and supports the planting of new trees to meet canopy cover targets, which are important for mitigating urban heat island effects and managing flood risk. The emphasis on biodiversity and habitat connectivity further contributes to ecosystem resilience, which is important in adapting to changing climatic conditions.
- 5.4.9. The spatial strategy in ASH1, which prioritises development within built-up areas and promotes brownfield reuse, aligns well with climate change objectives by reducing pressure on greenfield land and limiting urban sprawl. Concentrating growth in 'walkable neighbourhoods' reduces car dependency and associated emissions, indirectly contributing to mitigation.
- 5.4.10. Policy ASH13 supports active travel by promoting a walking and cycling network that connects residential areas with the Town Centre. It encourages developments to enhance this network and requires travel plans to contribute financially to footpath and cycleway improvements. The policy resists proposals that cause unmitigated loss or obstruction of these routes. By prioritising active travel, ASH13 helps reduce transport emissions and supports the ANP's climate objectives.

Community Wellbeing

- 5.4.11. Much of the undeveloped land surrounding Ash is constrained by international and national biodiversity designations, as well as the Metropolitan Green Belt. Furthermore, a significant greenfield strategic allocation to the south of the neighbourhood area is already under construction and is expected to be retained in the Guildford Local Plan

review. These constraints limit the scope for further greenfield development and reinforce the need to protect the remaining open countryside.

- 5.4.12. In the context of the above, the ANP adopts a 'brownfield first' strategy, prioritising the redevelopment of previously developed land within the neighbourhood area. This approach reflects both a sustainable planning ethos and the practical constraints of site availability. While brownfield opportunities are limited, the ANP seeks to maximise their potential through policies that support demolition and redevelopment, ensuring that any new development is well-integrated into the existing built environment. To guide this process, a Design and Development Code (DDC) is being prepared, which will help shape the form, scale, and character of future proposals.
- 5.4.13. Policy ASH5 identifies local centres and dispersed shops, recognising their importance in creating accessible, walkable communities that meet day-to-day needs. By supporting Class E uses and encouraging mixed-use schemes with residential above ground-floor units, the policy promotes local hubs, which enhance social interaction and reduce the need for travel. The focus on accessibility by walking, cycling, or public transport aligns well with creating connected, inclusive neighbourhoods. The policy also resists the loss of local shops unless clear evidence is provided, ensuring community facilities remain resilient.
- 5.4.14. Similarly, community facilities are protected and supported under ASH9, which resists the loss of existing assets unless viability is proven and encourages new or expanded facilities, including education and early years settings.
- 5.4.15. The housing mix, type, and tenure requirements in ASH8 encourage housing to be suitable for first-time buyers, renters, and downsizers, aiming to meet local needs. The 40% affordable housing requirement and emphasis on accessible and adaptable dwellings ensure the delivery of in-need housing, thereby reducing housing inequalities.
- 5.4.16. The spatial approach of ASH1 supports community wellbeing by directing development within existing built-up areas and promoting 'walkable neighbourhoods', fostering social cohesion and supporting local shops, services, and facilities. The policy's cautious approach to greenfield development and the protection of the settlement gap between Ash and Ash Green will also help maintain a sense of place and community identity.
- 5.4.17. Policy ASH13 contributes to wellbeing by improving active travel infrastructure, enhancing opportunities for healthy lifestyles and safer, more

sustainable journeys. This reduces social isolation and encourages community connectivity.

Historic Environment

- 5.4.18. Policy ASH2 sets out high-quality design principles for the Ash area, requiring all development proposals to positively contribute to local distinctiveness and character. By requiring full regard to the Ash Design Guidance and Codes, ASH2 ensures that new development respects the historic context and architectural character, thereby supporting the conservation of heritage assets within Ash. Complementing this, ASH3 addresses Ash Vale specifically, requiring that development within or near the Conservation Area preserves or enhances its special historic interest. Like ASH2, it requires compliance with the design guidance, ensuring that the unique historic character of Ash Vale is maintained and enhanced through sensitive, context-driven development.
- 5.4.19. Policy ASH4 extends these principles to Ash Green, emphasising the protection of the setting of key heritage assets such as Ash Manor. This includes safeguarding important views and approaches, for example from White Lane, and preventing development that would harm the rural character or lead to coalescence between Ash and Ash Green. Alongside the proposed 'local gap' on land to the north of the disused railway (as discussed within Chapter 4 of this Environmental Report), the policy's provisions for green buffers and transition zones help protect the historic landscape setting.

Landscape

- 5.4.20. Policy ASH1 establishes the spatial strategy directing significant development primarily to the built-up areas of Ash and Ash Vale, with Ash Green limited to small-scale infill. This approach helps prevent urban sprawl into the surrounding countryside and Green Belt, preserving the rural landscape and preventing coalescence between settlements.
- 5.4.21. Design principles set out in ASH2, ASH3, and ASH4 further protect landscape quality by ensuring all development respects local distinctiveness and character. In particular, ASH4 focuses on Ash Green's rural edge, requiring green buffers to soften development edges and maintain separation between Ash and Ash Green. This buffer zone helps protect the landscape's visual integrity and prevents the erosion of the settlement gap.
- 5.4.22. The Green and Blue Infrastructure policy (ASH10) plays an important role in landscape protection and enhancement, through the safeguarding and

enhancement of habitats, woodlands, hedgerows, water bodies, and recreational green spaces. The requirement for a minimum future canopy cover on larger development sites will benefit biodiversity, visual amenity, and climate resilience. Similar effects are anticipated from Policy ASH11, which protects important local green spaces from development except in very special circumstances.

Land, Soil, and Water Resources

- 5.4.23. The spatial focus of ASH1 on directing development primarily to built-up areas and prioritising brownfield land reuse helps limit the consumption of greenfield sites and agricultural land. This will lead to beneficial effects for protecting land and soil resources.
- 5.4.24. Design principles within ASH2, ASH3 and ASH4 contribute indirectly to land and water resource protection by promoting sensitive and contextually appropriate development. For example, ASH4's emphasis on green buffers and protection of the rural landscape in Ash Green helps preserve permeable land surfaces and natural drainage patterns, reducing the risk of soil erosion and runoff.
- 5.4.25. The Green and Blue Infrastructure policy (ASH10) is important for water resource protection. By safeguarding water bodies, hedgerows, and woodland habitats, the policy helps maintain natural regulatory ecosystem services such as water filtration and soil stability.

Transportation

- 5.4.26. Policy ASH13 identifies a walking and cycling network, which is designed to connect residential areas with the Town Centre and local services. The policy's support for proposals that enhance this network is beneficial for promoting active travel, contributing positively to health outcomes, reduced carbon emissions, and decreased traffic volumes. The requirement that travel plans prioritise financial contributions towards footpath and cycleway improvements demonstrates a proactive approach to embedding sustainable transport infrastructure within development schemes.
- 5.4.27. Policy ASH1 supports the spatial strategy of concentrating development within built-up areas, reinforcing 'walkable neighbourhood' principles. By locating homes, shops, and services close together, this reduces the need to travel by car and encourages walking and cycling for daily needs.
- 5.4.28. Design policies ASH2, ASH3 and ASH4 contribute indirectly by promoting high-quality, locally distinctive development that enhances pedestrian environments and provides safe, accessible routes for active travel. In

particular, ASH4's emphasis on ensuring safe and accessible links to the active travel network from Ash Green supports inclusive and convenient movement for residents.

- 5.4.29. The protection of local centres and dispersed shops under ASH5 further supports sustainable transport by maintaining accessible amenities within walking distance of residents, reducing the volume of car journeys in the neighbourhood area.

Cumulative Effects

- 5.4.30. The ANP shows strong consistency between its policies, which work together to support compact, walkable neighbourhoods supported by high-quality green and blue infrastructure. The ANP's policies are anticipated to reduce car use, encourage active travel, and contribute to climate change mitigation. The ANP also promotes inclusive growth by protecting local services, addressing housing need, and supporting community facilities, contributing to long-term social wellbeing.
- 5.4.31. Regarding in-combination effects with other plans, the ANP has been prepared in general conformity with the strategic policies of the Guildford Borough Local Plan Strategy and Sites (2015–2034, adopted 2019) and the Local Plan: Development Management Policies (2023). It aligns with Local Plan priorities for housing, employment land, sustainable transport, and green infrastructure. Together, the plans are expected to deliver beneficial effects in areas such as climate resilience, biodiversity, and access to services. However, growth in Ash and neighbouring parishes may lead to cumulative impacts on transport networks, landscape character, and public services. Ongoing coordination between parish councils and Guildford Borough Council will be important to manage these impacts and support long-term environmental and community outcomes.

5.5. Conclusions

- 5.5.1. The ANP is anticipated to result in **beneficial effects across all SEA themes**, with significant beneficial effects anticipated for **Biodiversity, Community Wellbeing, Historic Environment, Landscape, and Transportation**. These benefits are supported by a combination of spatial planning, design-led policies, protection of local assets, and promotion of sustainable travel and infrastructure. No significant adverse effects are anticipated from policies in the ANP.
- 5.5.2. While the ANP policies are expected to lead to beneficial effects, the SEA identifies opportunities to further strengthen their effectiveness. The

following recommendations are offered for consideration by plan makers to inform policy development:

- Supporting the provision of healthcare and social care facilities, to address the needs of an ageing population;
- Encouraging natural drainage solutions in all new developments would ensure effective management of surface water runoff, mitigating flood risk in the neighbourhood area;
- Encouraging the adoption of water efficiency measures, including rainwater harvesting and greywater reuse, are recommended to promote sustainable water resource management; and
- Encouraging the use of low-emission and electric vehicles, alongside the provision of appropriate charging infrastructure in new developments, would support the transition to cleaner transportation and contribute to local and national emissions reduction targets.

6. Next Steps

6.1. Plan Finalisation

- 6.1.1. Following Regulation 14 consultation, responses will be considered in finalising the ANP and SEA for submission. Following submission, the ANP and supporting evidence will be published for further consultation, and then subjected to Independent Examination. At Independent Examination, the ANP will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the Local Plan.
- 6.1.2. If the examination leads to a favourable outcome, the ANP will then be subject to a referendum, organised by Guildford Borough Council. If more than 50% of those who vote agree with the ANP, then it will be 'made'. Once 'made', the ANP will become part of the Development Plan for Guildford, covering the defined neighbourhood area.

6.2. Monitoring

- 6.2.1. The SEA regulations require 'measures envisaged concerning monitoring' to be outlined in this report. This refers to the monitoring of likely significant effects of the Neighbourhood Plan to identify any unforeseen effects early and take remedial action as appropriate.
- 6.2.2. It is anticipated that monitoring of effects of the ANP will be undertaken by Guildford Council as part of the process of preparing its Annual Monitoring Report (AMR). No significant negative effects are considered likely in the implementation of the ANP that would warrant more stringent monitoring over and above that already undertaken by Guildford Borough Council.

