



Sarratt Neighbourhood Plan

Strategic Environmental Assessment (SEA) & Habitat Regulations Assessment (HRA) Screening Report

Updated March 2024





About us

Place Services is a leading public sector provider of integrated environmental assessment, planning, design and management services. Our combination of specialist skills and experience means that we are uniquely qualified to help public organisations meet the requirements of the planning process, create practical design solutions and deliver environmental stewardship.

Place Services has a proven track record of delivering sustainable, creative and effective solutions for the built environment. Our in-house expertise comprises a multidisciplinary team which includes planners, urban designers, landscape architects, flood specialists and public art consultants. Our approach is client led; we work alongside our clients to deliver services, projects and planning objectives in a collaborative and cost effective way.

Copyright

This report may contain material that is non-Place Services copyright (e.g. Ordnance Survey, British Geological Survey, Historic England), or the intellectual property of third parties, which Place Services is able to provide for limited reproduction under the terms of our own copyright licences or permissions, but for which copyright itself is not transferable by Place Services. Users of this report remain bound by the conditions of the Copyright, Designs and Patents Act 1988 with regard to multiple copying and electronic dissemination of the report.

Disclaimer

The material contained in this report was designed as an integral part of a report to an individual client and was prepared solely for the benefit of that client. The material contained in this report does not necessarily stand on its own and is not intended to nor should it be relied upon by a third party. To the fullest extent permitted by law Place Services will not be liable by reason of breach of contract, negligence, or otherwise for any loss or damage (whether direct, indirect or consequential) occasioned to any person acting or omitting to act or refraining from acting in reliance upon the material contained in the report. Loss or damage as referred to above shall be deemed to include, but is not limited to, any loss of profits or anticipated loss of profits damage to reputation or goodwill, loss of business, or anticipated loss of business, damages, costs, expense incurred or payable to any third party (in all cases whether direct, indirect or consequential) or any other direct, indirect or consequential loss or damage.

Contents

1. Introduction	6
2. Legislative Background	9
3. SEA Screening	12
4. HRA Screening	28
5. Conclusions	55
6. References	56
Appendix 1	57
Appendix 2	58



List of Tables

Table 1: Exploring whether the Principle of the Plan would warrant SEA13
Table 2: Assessment of Likely Significant Effects on the Environment.....16
Table 3: Habitats Sites within 20km to be considered in this assessment30
Table 4: Assessment of potential impacts on Habitats Sites34
Table 5: Assessment of potential impacts from the Plan policies36

1. Introduction

1.1 The Purpose of this Report

This screening report is an assessment of whether or not the contents of the Sarratt Neighbourhood Plan requires a Strategic Environmental Assessment (SEA) in accordance with the European Directive 2001/42/ EC and associated Environmental Assessment of Plans and Programmes Regulations. A SEA is required if the Neighbourhood Plan is deemed to have a likely significant effect on the environment.

This report will also screen to determine whether the Neighbourhood Plan requires a Habitats Regulations Assessment (HRA) in accordance with Regulation 61 of the Conservation of Habitats and Species Regulations 2017 (as amended). An HRA screening report is required when it is deemed that likely adverse significant effects may occur on protected Habitats (European) Sites as a result of the implementation of a plan or project.

1.2 The Sarratt Neighbourhood Plan

The Neighbourhood Plan will set out planning policies for the Sarratt Neighbourhood Plan area. Once formally adopted, a Neighbourhood Plan carries the same legal weight as Local Development Plans adopted by the Local Planning Authority (LPA), in this case Three Rivers District Council.

A number of economic, social and environmental objectives have been devised for the Neighbourhood Plan. These are:

- Maintain the viability of the businesses and services that are key to the area:
 - village shop
 - pubs
 - garage
 - doctors surgery
 - bus service
 - school
 - church
- Ensure that community spirit is supported and enhanced.
- Develop a housing stock that meets the needs of all demographics within the community.
- Maintain the rural nature of the village and conserve its important historical and environmental features.
- Wherever possible, reduce the community's contribution to climate change.
- Preserve the character of the settlements within the parish.

- Keep the impact of any development on traffic in the area to a minimum.

1.3 The Three Rivers District Council Local Plan

The adopted Local Plan consists of three main documents: a Core Strategy Development Plan Document Development Plan Document (DPD), a Development Management Policies DPD and a Site Allocations Local Development Document (LDD). The content of these relevant to Sarratt is outlined in the corresponding sub-sections.

1.3.1 The Core Strategy DPD (2011)

The adopted Three Rivers Core Strategy contains the current strategic planning policy for the District and thus Sarratt. The Core Strategy 2011 includes a number of policies related to a strategy for growth in the District, the delivery of growth and the provision of infrastructure. A Sustainability Appraisal was carried out for the Core Strategy.

The Core Strategy categorised the settlement of Sarratt as a 'village' within the settlement hierarchy, as opposed to the 'principal town', 'key centres' and 'secondary centres' in the District, which have a more significant settlement size, population, existence of and access to services and transport infrastructure and importance in economic and retailing terms. The Spatial Strategy establishes that:

'Limited development to meet local needs will take place in the villages of Bedmond and Sarratt, recognising the need to sustain these more rural areas.'

Policy SP4 – Development in Villages (Bedmond, Sarratt) includes numerous criteria against which development proposals in villages would be deemed appropriate and sustainable. The Policy states that the villages should provide approximately 1% of the District's housing requirements over the Plan period, to include affordable housing to meet local needs. Furthermore, the Policy seeks improvements in Sarratt as follows:

- Extending and improving facilities at Frogmore Meadow Site of Special Scientific Interest, Sarratt
- Creating a play area in Sarratt to meet identified need
- Expansion of existing schools and/or provision of new schools meet identified needs in the Villages.

Policy CP4 – Affordable Housing seeks to increase the provision of affordable homes in the District and meet local housing need in the District. This includes a commitment by the Council to 'permit small-scale affordable housing within and immediately adjacent to the village core areas of Sarratt and Bedmond on the basis of need through the release and allocation of Rural Exception Sites. Allocations will be made through the Site Allocations Development Plan Document.'

1.3.2 The Development Management Policies DPD (2013)

The Development Management Policies Local Development Document (LDD) sets out the criteria against which all planning applications in the District will be considered, including Sarratt. The Council considers these policies will enable the long term vision for Three Rivers set out in the Core Strategy.

1.3.3 The Site Allocations LDD (2014)

The Site Allocations LDD supports the delivery of the Core Strategy. It allocates specific sites to meet needs for housing, employment, education, shopping and open spaces in Three Rivers. The LDD allocates land for development purposes within Sarratt, as follows:

- Allocation H(8) - Royal British Legion, Church Lane, Sarratt: allocated as a rural exception site to provide affordable housing (10 dwellings)
- King George V P Fields, George V Way, Sarratt: retained allocation for publically accessible open space

1.4 The Emerging Three Rivers Local Plan

Three Rivers District Council is preparing a new Local Plan that will set out a vision and policy framework for the future levels of growth within the District up until 2038.

At the time of writing, the Local Plan is at the 'Regulation 18 Preferred Policy Options' stage, which includes sites for potential allocation. A consultation on the 'Local Plan Regulation 18 Preferred Policy Options and Sites for Potential Allocation' documents ran from June 2021 to August 2021.

The sites for potential allocation includes a 'Preferred Policy on Sites for Gypsies and Travellers and Travelling Showpeople' which includes two sites within Sarratt:

- GT2 Fir Trees, Dawes Lane, Sarratt; and
- GT9 Deadmans Ash Lane, Sarratt.

The Policy outlines that these sites are existing traveller sites and proposed a continuation of their allocation or safeguarding for such a use. The emerging Local Plan proposes no other potential development allocations within Sarratt; a total of 16 sites having been proposed but not taken forward due to their non-conformity to the Plan's site selection methodology.

2. Legislative Background

2.1 Strategic Environmental Assessment (SEA)

Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment states that,

‘Environmental assessment is an important tool for integrating environmental considerations into the preparation and adoption of certain plans and programmes which are likely to have significant effects on the environment.

(10) All plans and programmes which are prepared for a number of sectors and which set a framework for future development consent of projects listed in Annexes I and II to Council Directive 85/337/EEC of 27 June 1985 on the assessment of the effects of certain public and private projects on the environment(7), and all plans and programmes which have been determined to require assessment pursuant to Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild flora and fauna(8), are likely to have significant effects on the environment, and should as a rule be made subject to systematic environmental assessment. When they determine the use of small areas at local level or are minor modifications to the above plans or programmes, they should be assessed only where Member States determine that they are likely to have significant effects on the environment.

(11) Other plans and programmes which set the framework for future development consent of projects may not have significant effects on the environment in all cases and should be assessed only where Member States determine that they are likely to have such effects.’

The Sarratt Neighbourhood Plan may influence frameworks for future development or become used ancillary to those plans and programmes that do set such a framework, and as such it has been determined that the principle of the Neighbourhood Plan should be screened for the necessary application of the SEA Directive.

The Report from the Commission to The Council, The European Parliament, The European Economic and Social Committee and the Committee of the Regions states, on the application and effectiveness of the Directive on Strategic Environmental Assessment (Directive 2001/42/EC), that

‘the following Plan & Programme (P&P), and modifications to them, are covered when prepared and/or adopted by an authority and required pursuant to legislative, regulatory or administrative provisions:

- P&P prepared for certain sectors and which set the framework for future development consent in respect of projects under the Environmental Impact Assessment-EIA-Directive.

- P&P requiring an assessment under the Habitats Directive (92/43/EEC).
- P&P setting the framework for development consent in respect of projects (not limited to those listed in the EIA Directive; see above) and determined by "screening" as being likely to have significant environmental effects.'

This report represents this screening process in regard to the content and influence of the Sarratt Neighbourhood Plan.

2.2 Habitats Regulations Assessment (HRA)

Under the provisions of the Habitats Regulations (The Conservation of Habitats and Species Regulations 2017, as amended), a competent authority must carry out an assessment of whether a plan or project will significantly affect the integrity of any European Site (also referred to as Habitats Sites in the National Planning Policy Framework), in terms of impacting the site's conservation objectives.

The first stage of HRA screening assessment of the impacts of a land use proposal against the conservation objectives of Habitats sites. Specifically, it is to ascertain whether or not a proposal (either alone or in combination with other proposals) would potentially damage the internationally designated features of that site. European sites are also known as Natura 2000 sites.

This HRA Screening Report has been undertaken in order to accompany the Sarratt Neighbourhood Plan in accordance with the Neighbourhood Planning (General) Regulations 2012.

The Neighbourhood Planning (General) Regulations 2012, state that submitted Plans need to be accompanied by a statement explaining how the proposed Plan meets the 'basic conditions' set out in Schedule 4B of the 1990 Town and Country Planning Act. These basic conditions include a requirement to demonstrate how the Plan is compatible with certain obligations, which includes the need to undertake an HRA.

In line with the Court judgement (CJEU People Over Wind v Coillte Teoranta C-323/17), mitigation measures cannot be taken into account when carrying out a screening assessment to decide whether a plan or project is likely to result in significant effects on a Habitats site.

On 23 June 2016, the United Kingdom (UK) held a referendum and voted to leave the European Union (EU). On 26 June 2018, The European Union (Withdrawal) Act 2018 received Royal Assent and the UK left the EU. The European Union (Withdrawal) Act 2018 made sure that UK laws continue to operate following the UK's exit. Relevant EU Directives have been transposed into UK law and those are unchanged until amended by Parliament. The requirements for HRA under the Conservation of Habitats and Species Regulations 2017 (as amended) remain in place with minor changes being affected by the Conservation of Habitats and Species Amendment (EU Exit) Regulations 2019. Parliament is however at liberty to introduce future changes to the Conservation of Habitats and Species Regulations 2017 (as amended) since, after 31 December 2020, the UK will no longer be bound by the EU Habitats and Wild Birds Directives.

At the present time the position, under section 6(3) EU (Withdrawal) Act 2018 (as amended), is that the courts in the UK, with the sole exception of the Supreme Court, will continue to be bound by HRA judgements handed down by the CJEU and by domestic courts prior to 31 December 2020 when interpreting the Conservation of Habitats and Species Regulations 2017 (as amended). This is the case as long as the Conservation of Habitats and Species Regulations 2017 (as amended) remain unmodified by Parliament.

There is currently a legal requirement for HRA screening of Plans *prior to being adopted* so any additional plans or projects which might reasonably interact with the Sarratt Neighbourhood Plan will be considered before post consultation.

3. SEA Screening

3.1 When is SEA Required?

Planning Practice Guidance – Strategic environmental assessment requirements for neighbourhood plans (Paragraph: 026 Reference ID: 11-026-20140306) states that,

‘In some limited circumstances, where a neighbourhood plan is likely to have significant environmental effects, it may require a strategic environmental assessment. Draft neighbourhood plan proposals should be assessed to determine whether the plan is likely to have significant environmental effects. This process is commonly referred to as a “screening” assessment and the requirements are set out in regulation 9 of the Environmental Assessment of Plans and Programmes Regulations 2004.

If likely significant environmental effects are identified, an environmental report must be prepared in accordance with paragraphs (2) and (3) of regulation 12 of those Regulations.

One of the basic conditions that will be tested by the independent examiner is whether the making of the neighbourhood plan is compatible with European Union obligations (including under the Strategic Environmental Assessment Directive).

To decide whether a draft neighbourhood plan might have significant environmental effects, it must be assessed (screened) at an early stage of the plan’s preparation according to the requirements set out in regulation 9 of the Environmental Assessment of Plans and Programmes Regulations 2004. These include a requirement to consult the environmental assessment consultation bodies.

Each consultation body will be able to advise on particular topics relevant to its specific area of expertise and responsibility, and the specific information that it holds.

Where it is determined that the plan is unlikely to have significant environmental effects (and, accordingly, does not require an environmental assessment), a statement of reasons for the determination should be prepared. A copy of the statement must be submitted with the neighbourhood plan proposal and made available to the independent examiner.’

Articles 2 and 3 of the SEA Directive set out the circumstances in which a SEA is required. Table 1 sets out the assessment of whether the principle of the Sarratt Neighbourhood Plan will require a full SEA.

Table 1: Exploring whether the Principle of the Plan would warrant SEA

Question 1: Is the Plan subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through legislative procedure by Parliament or Government?

Yes - The Neighbourhood Plan has been prepared for adoption through legislative procedure.

Question 2: Is the Plan required by legislative, regulatory or administrative provision? (Typical characteristics of "administrative provisions" are that they are publicly available, prepared in a formal way, probably involving consultation with interested parties. The administrative provision must have sufficient formality such that it counts as a "provision" and it must also use language that plainly requires rather than just encourages a Plan to be prepared.)

Yes - The Neighbourhood Plan would be considered as falling within the category of an 'administrative provision'.

Question 3: Is the Plan prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive?

Yes to both criteria - The Neighbourhood Plan has been prepared for town and country planning and sets a framework for future development consent.

Question 4: Will the Plan, in view of its likely effect on sites, require an assessment under Article 6 or 7 of the Habitats Directive?

The Neighbourhood Plan's likely effect on sites and requirement for an assessment under Article 6 or 7 of the Habitats Directive is explored in Section 4 of this Report.

Question 5: Does the Plan determine the use of small areas at local level, OR is it a minor modification of a Plan likely to require assessment under the Habitats Directive?

Yes to one of the criteria - the policies of the Neighbourhood Plan can be considered to determine the use of small areas at local level commensurate with their status in determining local planning applications.

Question 6: Does the Plan set the framework for future development consent of projects (not just projects in the Annexes of the EIA Directive)?

Yes - the Neighbourhood Plan has been prepared for town and country planning and sets a framework for future development consent.

Question 7: Is the Plans sole purpose to serve national defence or civil emergency, or is it a financial or budget Plan, or is it co -financed by structural funds or European Agricultural Guidance and Guarantee Fund (EAGGF) programmes 2000 to 2006/7?

The Neighbourhood Plan does not serve a purpose related to national defence or civil emergency, a financial or budget Plan. The Neighbourhood Plan is not co-financed by structural funds or EAGGF programmes 2000 to 2006/7.

Question 8: Is it likely to have a significant effect on the environment?

Likely significant effects are explored in more detail in Section 3.3 of this Screening Report. The 'conclusions' section of the Report outlines whether the Neighbourhood Plan requires SEA or not due in regard to its effects on the environment.

The following section looks at the criteria for assessing the effects of the Neighbourhood Plan and the identified effects of the Neighbourhood Plan in line with the criteria. Crucially, it will determine whether there are any likely significant effects on the environment.

3.2 Criteria for Assessing the Effects of the Neighbourhood Plan

Criteria for determining the likely significant effects on the environment, referred to in Article 3(5) of Directive 2001/42/EC are set out below.

Annex II of SEA Directive 2001/42/EC – Significant Effects

1. The characteristics of plans and programmes, having regard, in particular, to
 - the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources,
 - the degree to which the plan or programme influences other plans and programmes including those in a hierarchy,
 - the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development,

Annex II of SEA Directive 2001/42/EC – Significant Effects

- environmental problems relevant to the plan or programme,
- the relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste-management or water protection).

2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to

- the probability, duration, frequency and reversibility of the effects,
- the cumulative nature of the effects,
- the transboundary nature of the effects,
- the risks to human health or the environment (e.g. due to accidents),
- the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected),
- the value and vulnerability of the area likely to be affected due to:
 - * special natural characteristics or cultural heritage,
 - * exceeded environmental quality standards or limit values,
 - * intensive land-use,
 - * the effects on areas or landscapes which have a recognised national, Community or international protection status.

3.3 Likely Significant Effects resulting from the Neighbourhood Plan

The following assessment will consider the likelihood of the Sarratt Neighbourhood Plan (at the time of writing) to have significant effects on the environment. The table below will explore the likelihood of effects on the following required themes, as included within Annex I of the SEA Directive (2001/42/EC):

- Biodiversity;
- Population;
- Human health;
- Fauna;
- Flora;
- Soil;
- Water;
- Air;
- Climatic factors;
- Material assets;
- Cultural heritage including architectural and archaeological heritage;
- Landscape; and
- The interrelationship between the above factors.

Table 2: Assessment of Likely Significant Effects on the Environment

Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
<p>The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources.</p>	<p>The Plan sets out relevant policies which will be used to determine proposals for development within the Neighbourhood Plan area once adopted.</p> <p>A Neighbourhood Plan must demonstrate conformity with the strategic policies of the Local Plan and once brought into force, the policies it contains take precedence over existing non-strategic policies only in the Local Plan for that Neighbourhood Plan area. The principle of development is established for 'Villages', within the adopted Three Rivers Core Strategy however is limited to development that meets local needs, such as rural exception sites. The emerging Three Rivers Local Plan similarly allows for rural exception sites to come forward in Villages however does not identify a dwelling threshold applicable for the Neighbourhood Plan area. The Neighbourhood Plan does not allocate any land for development purposes.</p> <p>Irrespective of the Neighbourhood Plan policies' compliance</p>

Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
	<p>with those of the Local Plan, which will be considered between the Parish Council and the Local Planning Authority in finalising the Neighbourhood Plan and through the independent examination of the Neighbourhood Plan, it is considered that the degree to which the Neighbourhood Plan sets a framework for development is low. This is due to the Neighbourhood Plan not allocating land for development.</p>
<p>The degree to which the plan or programme influences other plans or programmes including those in a hierarchy.</p>	<p>The Neighbourhood Plan provides policies for the Plan area, relevant to a local level only. The Neighbourhood Plan does not allocate land for development purposes in accordance with the adopted Three Rivers Local Plan and the emerging Local Plan’s preferred policy position.</p> <p>The Neighbourhood Plan, when/if ‘made’, will have weight in all planning decisions within the plan area however the degree to which the plan influences other plans or programmes is considered low in the context of the plan area.</p>
<p>The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development.</p>	<p>Neighbourhood Plans are required to contribute to the achievement of sustainable development. The Neighbourhood Plan policies seek to ensure environmental considerations are taken into account. The Neighbourhood Plan includes policies related (directly / indirectly) to ensuring environmental considerations will be integrated into any forthcoming development within the Plan area. These are:</p> <ul style="list-style-type: none"> • Policy 2 – Design Principles • Policy 3 – Historic Character • Policy 6 – Biodiversity • Policy 7 – Landscape • Policy 12 – Renewable Energy & Green Infrastructure <p>Irrespective of the adequacy of the above policies, adopted Local Plan policies apply within the Neighbourhood Plan area, which have been subject to thorough assessment within the Local Plan Sustainability Appraisal and Habitats Regulations</p>

Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
	<p>Assessment. This ensures that environmental considerations, in particular with a view to promoting sustainable development, will be considered for all development proposals within the Neighbourhood Plan area.</p>
<p>Environmental problems relevant to the plan area</p>	<p>The Neighbourhood Plan reflects a small area and the Plan’s policy content seeks to address environmental issues. The policy content of the adopted Local Plan will additionally apply to any proposals within the Neighbourhood Plan area. Local Plan policies have been subject to Sustainability Appraisal (SA) within the context of the Local Plan. The Neighbourhood Plan and this Screening Report identify the following potential (direct / indirect) environmental problems or sources of potential problems relevant to the Neighbourhood Plan area:</p> <ul style="list-style-type: none"> • The Plan area contains numerous Sites of Specific Scientific Interest (SSSIs): the Frogmore Meadows SSSI (unfavourable recovering), Sarratt Bottom SSSI (unfavourable no change), and Whippendell Wood SSSI (favourable). A small part of the Westwood Quarry SSSI (favourable) is also located within the plan area. • The Plan area is therefore within the Impact Risk Zone (IRZs) of these SSSIs. Development proposals within IRZs are required to be consulted on with Natural England, should they be of a type or size that could warrant negative effects on the relevant SSSI. • A number of Priority Habitats (from the Priority Habitat Inventory¹) are scattered throughout the Plan area. These include good quality semi-improved grassland, ancient and semi-ancient woodland, ancient replanted woodland, deciduous woodland, broadleaved woodland, young trees woodland, mixed mainly conifer woodland, traditional orchard, and woodpasture and parkland

¹ a spatial dataset that describes the geographic extent and location of Natural Environment and Rural Communities Act (2006) Section 41 habitats of principal importance.

Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
	<p>habitat.</p> <ul style="list-style-type: none"> • There are 93 listed buildings within the parish, most of which are Grade II. • Of these listed buildings, the following are Grade II* listed: The Church of the Holy Cross; The Grove; Little Winch; and Redheath. • There are two Conservation Areas within the parish: The Green Conservation Area and Church End Conservation Area. • The parish also contains many unlisted buildings of architectural interest, and the Green is protected as an Area of Archaeological Significance. • Cassiobury Park, within the eastern part of the plan area, is a Grade II listed Registered Park and Garden. • The entirety of the plan area is within various Source Protection Zones (SPZs). SPZs are defined around large and public potable groundwater abstraction sites. The purpose of SPZs is to provide additional protection to safeguard drinking water quality through constraining the proximity of an activity that may impact upon a drinking water abstraction. Within the Neighbourhood Plan area, there lie areas of Zone I (Inner Protection Zone), Zone II (Outer Protection Zone) and Zone III (Total Catchment). • In addition, the majority of the plan area is within either a 'high' or 'medium-high' Groundwater Vulnerability area. This indicates the vulnerability of groundwater to a pollutant discharged at ground level based on hydrological, geological, hydrogeological and soil properties. • Western and southern parts of the plan area are within a 'countryside stewardship water quality priority area', noted as 'medium priority'. • A small amount of land within Flood Risk Zones 3 and 2 exists within the Neighbourhood Plan area, to

Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
	<p>the west. This is associated with the River Chess.</p> <ul style="list-style-type: none"> • The non-developed areas of the Plan area consist largely of Grade 3 ('good to moderate') soils, with a very small area in the west being of Grade 2 ('very good') soils. Grade 2 soil represents the best and most versatile soil within the wider District context. • The entirety of the plan area is also located within the Metropolitan Green Belt (MGB). • The M25 cuts through the plan area in its central-eastern part, which includes Junction 19. An Air Quality Management Area (AQMA) 'Chandler's Cross' for both particulates (PM10) and nitrogen dioxide (NO2) exists where Chandler's Lane crosses the M25 extending 74m either side of the centreline. • The 'Chorleywood' AQMA, for both PM10 and NO2, is located to the immediate south and at the boundary of the plan area, corresponding to junction 18 of the M25. • The plan area contains in its western part, part of the Chilterns Area of Outstanding Natural Beauty (AONB). • The Plan area is located within Chilterns National Character Area (NCA). • This NCA is characterised as a patchwork of mixed agriculture with woodland, set within hedged boundaries. Furthest from London, the natural and built features of the countryside are recognised as special and attractive in approximately half the National Character Area (NCA) by the designation of the Chilterns Area of Outstanding Natural Beauty (AONB). • Throughout the NCA area, historic buildings and also some more recent constructions display locally distinctive uses of local materials, particularly brick and flint. Large mansions and follies are frequent in the countryside, many relating to Registered Parks

Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
	and Gardens.
<p>The relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste management or water protection).</p>	<p>The content of the Neighbourhood Plan is not in conflict with those relevant planning documents within the wider district and county area related to waste management or water protection.</p>
<p>The probability, duration, frequency and reversibility of the effects on the following factors:</p>	<p>The following impacts have been identified within this Screening Assessment:</p>
<ul style="list-style-type: none"> • Biodiversity 	<p>The Plan includes Policy 6 – Biodiversity and Policy 12 – Renewable Energy & Green Infrastructure which set out protection objectives and priorities for biodiversity improvements in the parish and the impact of development proposals on the local environment, such as management of surface water and support for biodiversity.</p> <p>The Plan area includes three SSSIs, and is within the IRZs of these. Any planning applications coming forward within the plan area may require consultation with Natural England should they be of a size or type that meets specific conditions. Nevertheless, the Plan does not allocate any land for development purposes that could potentially conflict with any such requirements.</p> <p>The HRA element of this Screening Report identifies that the Neighbourhood Plan is not predicted to have a Likely Significant Effect on the designated features of any Habitats site, either alone or in combination with other plans and projects.</p>

Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
	<p>In consideration of all of the above effects on biodiversity that would require the full application of the SEA Directive (a SEA Environmental Report) can be screened out.</p>
<ul style="list-style-type: none"> • Population 	<p>It is considered that there would be no significant effects on population resulting from the Neighbourhood Plan. This is due to the small scale of the plan area.</p>
<ul style="list-style-type: none"> • Health 	<p>The Neighbourhood Plan includes Policy 11: Local Green Spaces which designates existing green spaces and seeks their protection. This can be seen to support the principles of improving health and wellbeing in the plan area.</p> <p>The plan area contains an AQMA, 'Chandlers Cross', associated with Junction 19 of the M25. The Plan is limited in its remit to positively affect such issues, however does not seek to allocate resources for development purposes in or near this AQMA that may subsequently be affected by air quality.</p> <p>There are therefore no significant effects resulting from the Neighbourhood Plan regarding human health that would warrant a strategic assessment through SEA.</p>
<ul style="list-style-type: none"> • Fauna 	<p>There are no direct impacts resulting from the Neighbourhood Plan on fauna that are considered significant at the Plan level. The Plan seeks the protection and enhancement of biodiversity at key sites and does not propose any development that could lead to the direct deterioration of habitats.</p> <p>Possible effects on fauna (outside those associated with Habitats Sites) cannot be considered strategically significant to the extent that Strategic Environmental Assessment would be warranted. Such issues are more appropriate to be considered on a case-by-case 'project level' basis at the development management stage and in accordance with relevant development management policies contained within</p>

Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
	<p>the LPA’s adopted Local Plan.</p> <p>Effects on fauna from the content of the Neighbourhood Plan can therefore be screened out.</p>
<ul style="list-style-type: none"> • Flora 	<p>Numerous and various areas of Priority Habitat exist within the plan area. The Plan seeks to protect and enhance existing biodiversity assets in the Neighbourhood Plan area.</p> <p>In addition to the Plan’s policies that seek the protection and enhancement of flora, the Three Rivers Local Plan policies apply relevant to such matters and the minimisation of effects. As a result, no effects are expected to result from the Neighbourhood Plan regarding flora.</p>
<ul style="list-style-type: none"> • Soil 	<p>The non-developed areas of the Neighbourhood Plan area consist of predominantly Grade 3 (‘good to moderate’) soils, with a small area of Grade 2 (‘very good’) soils. The Neighbourhood Plan does not allocate land for development purposes, and encourages the use of previously developed land in the first instance. There are no identified negative implications surrounding soil quality as a result of the Neighbourhood Plan.</p>
<ul style="list-style-type: none"> • Water 	<p>Land within Source Protection Zones I, II and III makes up the entirety of the Plan area. Source Protection Zones (SPZs) respond to sources such as wells, boreholes and springs used for public drinking water supply. These zones show the risk of contamination from any activities that might cause pollution in the area.</p> <p>The Neighbourhood Plan does not allocate any land for development purposes and as such no uses are considered to give rise to ground water pollutants (e.g. give rise to hazardous substances such as pesticides, oils, petrol and diesel, solvents, arsenic, mercury or chromium VI; or non-hazardous substances such as ammonia or nitrates).</p> <p>The HRA element of this Screening Report identifies that the</p>

Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
	<p>Plan area lies outside the Impact Risk Zones for water sensitive habitat sites and there are none within the scope of this assessment. Therefore, no likely significant effects are expected and changes in water quantity and quality have been screened out when considered from the Plan either alone or in combination with other plans and projects.</p>
<ul style="list-style-type: none"> Air 	<p>The plan area contains an AQMA, ‘Chandlers Cross’, associated with Junction 19 of the M25. The Plan is limited in its remit to positively affect such issues, however does not seek to allocate resources for development purposes in or near this AQMA that may subsequently be affected by air quality.</p> <p>Although consultation with Natural England is required for any development that could cause air pollution (regarding industrial/agricultural development) in association with the IRZs of SSSIs in parts of the Plan area, no allocations are included within the Plan. If speculative development does come forward within the Plan period, consultation would be required at the planning application stage and is not considered a matter would warrant SEA, as a strategic process, to be undertaken.</p>
<ul style="list-style-type: none"> Climatic factors 	<p>No policies exist within the Plan that address flood risk issues, although it should be acknowledged that existing adopted Local Plan policies regarding flood risk apply in the Plan area.</p> <p>The Neighbourhood Plan area contains a relatively small area of Flood Risk Zone 3 associated with the River Chess, which is distanced from the built up area of Sarratt village. No development allocations are proposed within the Plan that would lead to any incompatibilities in any such areas. It is therefore considered that SEA would not be required regarding matters of flood risk and any speculative development coming forward within the Neighbourhood Plan area in the Plan period can be considered at the planning application stage.</p>

Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
<ul style="list-style-type: none"> Material assets 	<p>The Plan area does not contain land within a Minerals Consultation Area (MCA) within the County Council's adopted Minerals Local Plan. The Plan area similarly does not contain any existing or allocated sites for waste management facilities within the County Council's adopted Waste Local Plan.</p> <p>Regarding other material assets, the content of the Neighbourhood Plan is not considered to have any significant effects due to the extent / size of the Plan area. Such issues are more appropriate to be considered on a case-by-case basis at the development management stage and in accordance with relevant development management policies contained within the LPA's adopted Local Plan.</p>
<ul style="list-style-type: none"> Cultural heritage 	<p>The Plan area contains numerous Listed Buildings, as well as two Conservation Areas (The Green and Church End) and a Registered Park and Garden (Cassiobury Park). The Plan does not allocate land for development purposes that could have any effects on these listings or their settings. The Plan includes Policy 3: Historic Character, which seeks to protect the setting of the parish's two Conservation Areas.</p> <p>Irrespective of the adequacy of the Plan's historic character policy in the conservation and enhancement of the Plan area's heritage assets and their settings, policy regarding the protection and enhancement of the Historic Environment also exists at the LPA level which additionally applies in the Plan area. The effects on heritage are, as a result, considered a development management issue in the context of the Plan and its content. There are not considered to be any elements of the Plan that would give rise to significant effects on the historic environment at the strategic level that would require the full application of the SEA Directive.</p>
<ul style="list-style-type: none"> Landscape 	<p>The parish is within a sensitive landscape, in regard to the protection objectives of the Chilterns National Character Area (NCA) and the Chilterns AONB, part of which lies within the plan area. The plan area contains numerous features synonymous with this NCA and is furthermore entirely within</p>

Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
	<p>the Metropolitan Green Belt. The Plan does not allocate any land for development purposes and includes Policy 7: Landscape, which requires proposals to respect and where possible enhance landscape features and visual amenity.</p> <p>In light of the Plan not allocating land for development purposes, its policy stance regarding landscape character, and also in consideration also of the requirements of development proposals in accordance with the Three Rivers Local Plan, there are no significant strategic landscape effects identified within this Report that would warrant the requirement for the application of the SEA Directive and the formulation of a SEA Environmental Report.</p>
The cumulative nature of the effects.	The Plan does not allocate any land for development purposes and therefore any negative cumulative effects can be ruled out.
The trans boundary nature of the effects.	The adopted Three Rivers Local Plan can be seen to support the protection and improvement of conditions relevant to those sustainability factors listed within the SEA Directive. The Neighbourhood Plan is broadly aligned with the principles of those wider thematic environmental policies. The HRA Screening element of this Report, which explores in-combination effects with other relevant plans and projects, also identifies no in-combination effects regarding Habitats (European) Sites.
The risks to human health or the environment (e.g. due to accidents).	It is considered that there is no risk to human health or the environment as a result of the Neighbourhood Plan. This is in consideration of the above screening requirements related to sustainability themes. The Neighbourhood Plan is unlikely to give rise to any accidents that can be considered to have a significant risk to human health or the environment.
The magnitude spatial extent of the effects	The Neighbourhood Plan relates to the local level only. The magnitude and spatial extent of the Plan's content is therefore

Criteria for determining the likely significance of effects (Annex II SEA Directive)	Likelihood and summary of significant effects
(geographical area and size of the population likely to be affected).	not considered significant in a wider District context. No effects are highlighted within this SEA screening at either the local or wider geographic area.
<p>The value and vulnerability of the area likely to be affected due to:</p> <ul style="list-style-type: none"> • special natural characteristics or cultural heritage • exceeded environmental quality standards • intensive land use 	As highlighted above in the screening of the Neighbourhood Plan per sustainability theme, the Neighbourhood Plan has not been assessed as having negative effects associated with environmental themes.
The effects on areas or landscapes which have a recognised national, community or international protection status.	As highlighted above in the screening of the Plan per sustainability theme, the Neighbourhood Plan has not been assessed as having any significant effects on areas or landscapes which have a recognised national, community or international protection status.

4. HRA Screening

4.1 Habitat Regulations Assessment of Development Plans

This section forms a plan level Habitats Regulations Assessment (HRA) as required by Regulation 63 of The Conservation of Habitats and Species Regulations 2017 (as amended).

This section of this Report aims to:

- Identify the Habitats sites within 20km of Sarratt Neighbourhood Plan area.
- Summarise the reasons for designation and Conservation Objectives for each site to be considered in this assessment.
- Screen the Sarratt Neighbourhood Plan for its potential to impact upon a Habitats site.
- Assess the potential for in combination effects from other projects and plans in the area.
- Identify if there are any outstanding issues that need further investigation.

4.2 Court Judgements and their consideration in this Report

4.2.1 CJEU People Over Wind v Coillte Teoranta C-323/17

As previously mentioned, in line with the Court judgement (CJEU People Over Wind v Coillte Teoranta C-323/17), mitigation measures cannot be taken into account when carrying out a screening assessment to decide whether a plan or project is likely to result in significant effects on a Habitats site.

This HRA Screening Report does not therefore consider mitigation measures within the assessment of Likely Significant Effects resulting from the Sarratt Neighbourhood Plan.

4.2.2 CJEU Holohan C- 461/17

This Court judgement now imposes more detailed requirements on the competent authority at Appropriate Assessment stage:

1. [...] an 'Appropriate Assessment' must, on the one hand, catalogue the entirety of habitat types and species for which a site is protected, and, on the other, identify and examine both the implications of the proposed project for the species present on that site, and for which that site has not been listed, and the implications for habitat types and species to be found outside the boundaries of that site, provided that those implications are liable to affect the conservation objectives of the site.
2. [...] the competent authority is permitted to grant to a plan or project consent which leaves the developer free to determine subsequently certain parameters

relating to the construction phase, such as the location of the construction compound and haul routes, only if that authority is certain that the development consent granted establishes conditions that are strict enough to guarantee that those parameters will not adversely affect the integrity of the site.

3. [...] where the competent authority rejects the findings in a scientific expert opinion recommending that additional information be obtained, the 'Appropriate Assessment' must include an explicit and detailed statement of reasons capable of dispelling all reasonable scientific doubt concerning the effects of the work envisaged on the site concerned.

Within this Stage 1 HRA Screening report, the assessment determines the requirement whether or not a Stage 2 Appropriate Assessment is needed for the Sarratt Neighbourhood Plan.

4.3 Habitats (European) Sites

Habitats sites is the term used in the (revised) NPPF (2021) to describe any site which would be included within the definition at Regulation 8 of the Conservation of Habitats and Species Regulations 2017 (as amended) for the purpose of those regulations. These now form part of the UK national network of sites for nature protection. The aim of the network is to assure the long-term survival of UK's most valuable and threatened species and habitats.

All Special Protection Areas (SPAs) are designated for birds and Special Areas of Conservation (SACs) are designated for other species, and for Habitats. Wetlands of International Importance (Ramsar sites) are also part of the National Network of sites. This is because all SPAs and SACs are comprised of Sites of Special Scientific Interest (SSSIs) and all Ramsar sites in England are SSSIs. Together, SPAs, SACs and Ramsar Sites make up the Habitats sites in England. The following offers a description and explanation of SPAs, SACs and Ramsar Sites.

4.3.1 Explanation of SPAs, SACs and Ramsar Sites

Special Protection Areas (SPAs)

SPAs are areas which have been identified as being of international importance for the breeding, feeding, wintering or the migration of rare and vulnerable species of birds. Example: South West London Waterbodies SPA is internationally important for wintering waterfowl. Legislation: Conservation of Habitats and Species Regulations 2017 (as amended).

Special Areas of Conservation (SACs)

SACs are areas designated to protect habitat types that are in danger of disappearance, have a small natural range, or are highly characteristic of the region; and to protect species that are endangered, vulnerable, rare, or endemic. Example: Burnham Beeches is an extensive area of former beech wood-pasture with many old pollards and associated beech

and oak high forest. Surveys have shown that it is one of the richest sites for saproxylic invertebrates in the UK, including 14 Red Data Book species. It also retains nationally important epiphytic communities, including the moss *Zygodon forsteri*. Legislation: Conservation of Habitats and Species Regulations 2017 (as amended).

Wetlands of International Importance (Ramsar Sites)

Ramsar Sites are designated to protect the biological and physical features of wetlands, especially for waterfowl habitats. For example, South West London Waterbodies which comprises a number of reservoirs and former gravel pits in the Thames Valley and support internationally important numbers of Gadwall and Shoveler. Ramsar sites often overlap with SACs and SPAs and UK planning policy determines that they should be accorded the same importance when developments are proposed. Legislation: Ramsar Convention (1971) – Wetlands of International Importance and Conservation of Habitats and Species Regulations 2017 (as amended).

4.3.2 Habitats Sites to be considered

There are two Habitats site which lie within 20 km of the Sarratt Neighbourhood Plan area. This is shown in Table 3 and in Appendix 2.

Table 3: Habitats Sites within 20km to be considered in this assessment

SPA
N/A
SAC
Burnham Beeches Chilterns Beechwoods
Ramsar
N/A

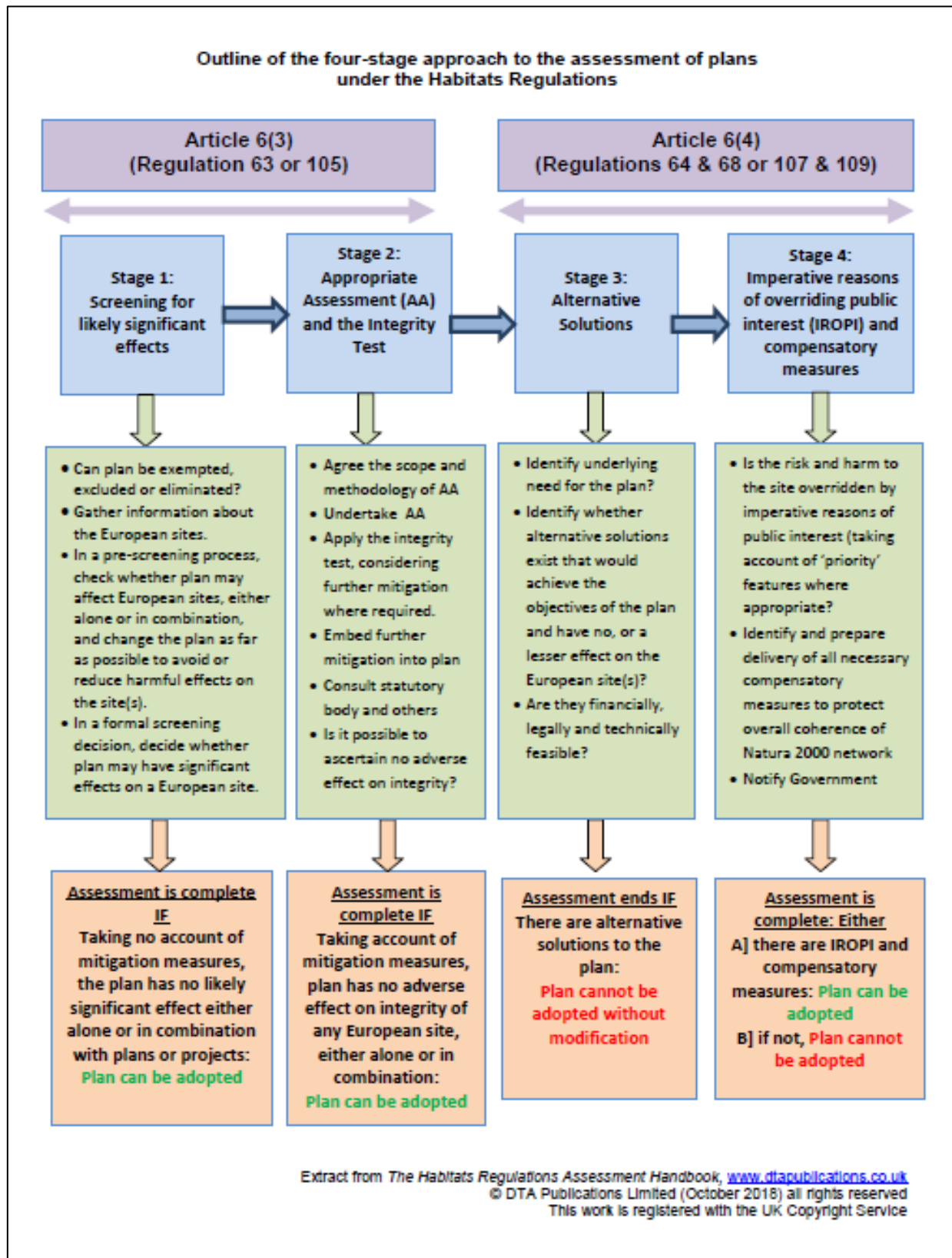
Consideration was given to potential impact pathways, Impact Risk Zones (IRZ) for the underpinning SSSIs for the Habitats sites listed in Table 3 and Zones of Influence (ZOI) as confirmed on MAGIC website www.magic.gov.uk and Sarratt parish lies outside the 5.6 km ZOI for Burnham Beeches SSSI and within the 12.6km ZOI for Chilterns Beechwoods SAC for predicted recreational impacts.

On a precautionary principle, it is concluded that there is no likely impact on any of the Habitats sites within scope resulting from the Sarratt Neighbourhood Plan.

4.4 Method and Approach

The Neighbourhood Planning (General) Regulations 2012 state that submitted Plans need to be accompanied by a statement explaining how the proposed Plan meets the 'basic conditions' set out in Schedule 4B of the 1990 Town and Country Planning Act. These basic conditions include a requirement to demonstrate how the Plan is compatible with EU obligations, which includes the need to undertake a HRA screening report; this is necessary to ensure the making of the neighbourhood plan is not likely to have a significant effect on a Habitats (European) site or a Habitats (European) offshore marine site, either alone or in combination with other plans or projects. This document relates only to Stage 1 of the HRA process as set out in Figure 1 below.

Figure 1: Outline of the Four Stage Approach to the Assessment of Plans under the Habitats Regulations (taken from the DTA handbook).



4.4.1 Stage 1: HRA Screening

The screening stage identifies if any significant effects are likely because any policies or projects will have an impact on a Habitats site. Table 4 identifies the different categories assigned to each policy in the plan: Category A identifies those policies or projects that are considered to have No Negative Effect. Category B identifies those policies or projects that will have No Likely Significant Effect. Category C identifies those policies or projects that might have Likely Significant Effect upon a Habitats site either alone or in combination with other plans or projects. Section 4.5 considers each policy or projects and the results of the screening exercise recorded.

Each of the policies in the Sarratt Neighbourhood Plan has been screened to identify whether they would have any effect on a Habitats site and allocated to a category as shown in Table 4.

Table 4: Screening categorisation

Category A: No negative effect
Policies or projects that will not be likely to have any negative effect on a Habitats site.
Category B: No Likely Significant Effect
Policies or projects that could have an effect but would not be likely to have a <i>significant</i> negative effect on a Habitats site alone or in combination. This conclusion could only be reached if the effects, even in combination and taking the precautionary principle into account, are considered trivial.
Category C: Likely Significant Effect
Policies or projects which are predicted to have a likely significant effect on a Habitats site either alone or in combination with other plans and projects and require revision or further assessment (Appropriate Assessment).

4.4.2 Potential impacts of Sarratt Neighbourhood Plan on Habitats Sites

There are a wide range of potential impacts on Habitats Sites that could arise from development plans. These can be summarised as -

- Land take by development;
- Impact on protected species found within but which travel outside the protected sites may be relevant where development could result in effects on qualifying interest species within the Habitats site, for example through the loss of feeding

grounds for an identified species.

- Increased disturbance, for example from recreational use resulting from new housing development and / or improved access due to transport infrastructure projects;
- Changes in water availability, or water quality as a result of development and increased demands for waste water treatment, and changes in groundwater regimes due to increased impermeable areas;
- Changes in atmospheric pollution levels due to increased traffic, waste management facilities etc. Pollution discharges from developments such as industrial developments, quarries and waste management facilities.

Each policy will be assessed against the criteria in the table below.

Table 4: Assessment of potential impacts on Habitats Sites

Nature of potential impact	How the Sarratt Neighbourhood Plan (alone or in combination with other plans and projects) could affect a Habitats site	Why these effects are not considered significant
Land take by development	The Sarratt Neighbourhood Plan area is outside the boundaries of the Habitats sites within scope of this HRA screening.	No likely significant effects are expected, as no development will be allocated on designated land. It is therefore, considered that impacts from land take by development can be screened out when considered from the Plan either alone or in combination with other plans and projects.
Impact on protected species outside the protected sites	The Sarratt Neighbourhood Plan area lies outside the 5.6 km IRZ for Burnham Beeches SSSI which underpins the SAC designation.	There is no risk of impacts on protected species outside of the protected sites. It is therefore considered that this impact pathway will not result in likely significant effects upon Habitats sites from the Neighbourhood Plan. Therefore, impacts on protected species outside the protected sites from the Neighbourhood Plan (either alone or in combination with

Nature of potential impact	How the Sarratt Neighbourhood Plan (alone or in combination with other plans and projects) could affect a Habitats site	Why these effects are not considered significant
		other plans and projects) on the Habitats sites can be screened out from further assessment.
Recreational pressure and disturbance	The Sarratt Neighbourhood Plan area lies outside the 5.6km Zone of Influence on Burnham Beeches SAC but within the 12.6km ZOI for Chiltern Beechwoods SAC predicted recreational impacts.	<p>The Sarratt Neighbourhood Plan does not allocate land for development, so impacts from recreation arising from the NP are screened out when considered from the Plan either alone or in combination with other plans and projects.</p> <p>The letter from Natural England to LPAs (in March 2022) <i>Developments to the emerging evidence relating to the recreational impacts upon Chilterns Beechwoods Special Area of Conservation (SAC) and the need for a Mitigation Strategy</i> did not include Three Rivers DC.</p>
Water quantity and quality	The Sarratt Neighbourhood Plan area lies outside the impact risk zones for water sensitive habitat sites and there are none within the scope of this assessment.	No likely significant effects are expected so changes in water quantity and quality have been screened out when considered from the Plan either alone or in combination with other plans and projects.
Changes in pollution levels	The Sarratt Neighbourhood Plan area lies outside the IRZs for pollution levels for sensitive Habitat sites within the scope of this assessment.	No likely significant effects are expected, so changes in air pollution have been screened out when considered from the Plan either alone or in combination with other plans.

4.5 Results from HRA Screening of Neighbourhood Plan Policies

Each of the policies in the Sarratt Neighbourhood Plan was screened in turn to identify whether they would have any impact on a Habitats site and the result of this exercise is recorded in Table 5.

Table 5: Assessment of potential impacts from the Plan policies

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on the Habitats Sites?	Recommendations
<p>Policy 1: Development in Villages and Hamlets</p>	<p>To accord with the principles of sustainable development outlined in the NPPF and TRDC Development Plan. To achieve this, sustainable development that makes the use of previously developed land will be encouraged and all new development must:</p> <ul style="list-style-type: none"> • respond positively to the local context. • protect the historic character of the core village of Sarratt and hamlets of Belsize and Bucks Hill <p>Proposals for development on the edge of the village and hamlets will only be supported where they are small scale and meet an identified local need, with priority given to previously-developed sites.</p> <p>All major applications shall be comprehensively planned to prevent piecemeal development, having regard to the timely and coordinated provision of infrastructure, services, open space and facilities made</p>	<p>No, Category A</p>	<p>No specific recommendations</p>

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on the Habitats Sites?	Recommendations
	<p>necessary by the development. They shall also be accompanied by a statement of community engagement to detail how the local community has been engaged prior to any planning application being made.</p>		
<p>Policy 2: Design Principles</p>	<p>Development proposals will be required to have regard to the design guidelines in the Sarratt Design Code report (January 2020). In particular, the following are regarded as key elements in the Design Codes:</p> <p>Pattern and Layout of Buildings</p> <ul style="list-style-type: none"> • The existing rural character must be appreciated when contemplating new development, whatever its size or purpose. • Gateway and landmark buildings should reflect local character. This means larger houses in local materials with emphasis on the design of chimneys and fenestration, as well as well laid and cared for landscape. • Where an intrinsic part of local character, properties should be clustered in small pockets showing a variety of types. The use of a repeating type of dwelling along the entirety of the street should be avoided (to create variety and interest in the streetscape). 	<p>No, Category A</p>	<p>No specific recommendations</p>

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on the Habitats Sites?	Recommendations
	<p>Local Green Spaces and Views</p> <ul style="list-style-type: none"> • Development adjoining public open spaces and important gaps should enhance the character of these spaces by either providing a positive interface (i.e. properties facing onto them to improve natural surveillance) or a soft landscaped edge. • Any trees or woodland lost to new development must be replaced. • The spacing of development should reflect the rural character and allow for long distance views of the countryside from the public realm. • Native trees and shrubs should be used to reinforce the rural character of the village and incorporated into the design of new areas. <p>Materials and Building Details</p> <p>The materials and architectural detailing in Sarratt contribute to the rural character of the area and the local vernacular. It is therefore important that the materials used in proposed development are of a high quality and reinforce local distinctiveness. Any future development proposals should demonstrate that the palette of materials has been selected based on an understanding of the</p>		

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on the Habitats Sites?	Recommendations
	<p>surrounding built environment.</p> <p>Wildlife-friendly environment</p> <ul style="list-style-type: none"> • New developments should always aim to strengthen biodiversity and the natural environment by creating new habitats and wildlife corridors, ensuring the continuity of habitats between gardens and public spaces. • Protecting and enhancing existing landscape assets is crucial. The aim should always be to minimise the damage to natural habitats, add to the character and distinctiveness of a place, and contribute to climate change adaptation. <p>Building Modifications, Extensions, and Plot Infill</p> <p>Extensions to dwellings can have a significant impact not only on the character and appearance of the building, but also on the street scene within which it sits. A well-designed extension can enhance the appearance of its street, whereas an unsympathetic extension can have a harmful impact, create problems for neighbouring residents and affect the overall character of the area.</p> <ul style="list-style-type: none"> • Extensions should be appropriate to the scale, massing and design of the main building and 		

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on the Habitats Sites?	Recommendations
	<p>complement the streetscape.</p> <ul style="list-style-type: none"> • Alterations and extensions of historic buildings should respect the host building. Replacement of historic and traditional features, such as timber windows and doors with uPVC and other non-traditional materials should be avoided. 		
<p>Policy 3: Historic Character</p>	<p>Development proposals within or affecting the setting of the Green Conservation Area and Church End Conservation Area, should conserve and enhance their distinctive characters in accordance with the Green, Sarratt Conservation Area Appraisal 1994 and the Church End, Sarratt Conservation Area Appraisal 1994. In particular, they should recognize that control needs to be maintained in order to ensure the current balance between buildings and open spaces is preserved.</p> <p>Development that adversely affects the important views in and out of the Conservation Areas will not be supported.</p>	<p>No, Category A</p>	<p>No specific recommendations</p>
<p>Policy 4: Housing Mix</p>	<p>Policy 4.1</p> <p>Development proposals for all housing types should have a size mix comprising of dwellings of three bedrooms (50%), two bedrooms (30%) and one bedroom</p>	<p>No, Category A</p>	<p>No specific recommendations</p>

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on the Habitats Sites?	Recommendations
	<p>(20%), or as near to the housing allocation mix as practical.</p> <p>Policy 4.2</p> <p>Development proposals where the provision of bungalows, accessible homes and all types of self-build properties as part of the housing allocation mix above will be looked upon favourably, provided they are 3 bedrooms or fewer. Permitted development rights shall be removed, so as to prevent future development into larger dwellings without planning permission.</p>		
<p>Policy 5: Affordable Housing</p>	<p>Policy 5.1</p> <p>Development proposals of 1+ units or over are required to have at least 45% as Affordable Housing. Commuted payments towards provision off site will only be accepted in exceptional circumstances to ensure delivery of affordable housing to the local community.</p> <p>Policy 5.2</p> <p>Proposals for Affordable Housing will be required to be 70% for social rent, 25% First Homes affordable shared ownership products and 5% intermediate.</p> <p>Policy 5.3</p> <p>Affordable homes will be integrated</p>	<p>No, Category A</p>	<p>No specific recommendations</p>

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on the Habitats Sites?	Recommendations
	<p>into developments in design, layout and location so as not to be distinguishable from other homes on the development.</p> <p>Policy 5.4</p> <p>Affordable Housing of all types will be looked upon favourably if provided with a Locality Protection Provision, which gives priority to local residents in perpetuity, but without restricting allocation should no local need be identified in the first instance, whether or not as part of a Rural Exception site</p>		
<p>Policy 6: Biodiversity</p>	<p>Policy 6.1: General</p> <p>i. All proposals should achieve a net gain in biodiversity where it is feasible and proportionate to do so, as measured by the Natural England Biodiversity Metric; and should avoid harm to, or loss of, features that contribute to the local and wider ecological network.</p> <p>ii. Proposals will be expected to apply the mitigation hierarchy of avoidance, mitigation and compensation, as set out in the NPPF, and integrate ecologically-beneficial planting and landscaping into the overall design – this must be approved by a certified ecologist. Where mitigation and/or compensation are proposed, any sites that may be put forward for compensatory planting must be</p>	<p>No, Category A</p>	<p>No specific recommendations</p>

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on the Habitats Sites?	Recommendations
	<p>within the Parish, and as close to the development as possible, ensuring that those who have lost out due to development are compensated in a way that is of actual value to them.</p> <p>Policy 6.2: Locally-Designated Nature Conservation Sites</p> <p>i. Development proposals, land use or activity (either individually or in combination with other developments) which are likely to have a detrimental impact which adversely affects the integrity of a designated site, will not be permitted unless it can be demonstrated that there are material considerations which clearly outweigh the need to safeguard the nature conservation value of the site, and any broader impacts on the international, national, or local network of nature conservation assets. [Below is a map showing the AONB (red outline), LNRs(hatched turquoise) and SSSIs (solid green and solid orange – colour and number indicates current state of the SSSI) that form part of the parish. A second map shows ancient woodland – the green hatching shows ancient and semi-natural woodland, and the brown shows ancient replanted woodland.] Sarratt Parish is incredibly fortunate to count 18% of its total land area as woodland, compared</p>		



Policy Number	Policy Wording	Will Policy have Likely Significant Effects on the Habitats Sites?	Recommendations
	<p>to the national average of 12%. This brings with it a significant financial burden and depth of responsibility which is willingly shouldered by the parish council, and valued by both parishioners and visitors to the parish.</p> <p>ii. Evidence will be required in the form of up-to-date ecological surveys undertaken by a competent ecologist prior to the submission of an application. The type of evidence required will be commensurate to the scale and location of the development, the likely impact on biodiversity and the legal protection or other status of a site. Where insufficient data is provided, permission will be refused.</p> <p>iii. Proposals should avoid impacts on sites of nature conservation value and wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where adverse impacts are unavoidable, measures to mitigate the impact should be sought, commensurate to the importance of the site in terms of its status in the hierarchy and the contribution it makes to wider ecological networks. It is worth noting that adverse impacts are almost always avoidable by rejecting development</p>		

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on the Habitats Sites?	Recommendations
<p>Policy 6.3: Species and Habitats</p>	<p>i. Development should always seek a net gain to biodiversity and to create opportunities for wildlife. Proposals must demonstrate how the development improves the biodiversity value of the site and surrounding environment. Evidence will be required in the form of up-to-date ecological surveys undertaken by a competent ecologist prior to the submission of an application. Plans must be submitted that determine the maintenance programme for any newly planted trees/hedgerows/ new ponds, and this will be the responsibility of the developer. Thought must be given to water supply and soil type before permission is given for new plantings, as this will determine whether they will survive. The Biodiversity value of a site pre and post development will be determined by applying the Natural England Biodiversity Metric where appropriate. Submitted information must be consistent with BS 42020 2013. Where insufficient data is provided, permission will be refused.</p> <p>ii. Proposals should detail how required mitigation, compensation or enhancement measures of physical features will be maintained in the long term.</p> <p>iii. Development which would result in the loss or significant damage to</p>	<p>No, Category A</p>	<p>No specific recommendations</p>

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on the Habitats Sites?	Recommendations
	<p>trees, hedgerows or ancient woodland sites will not be permitted. The Council will seek their reinforcement by additional planting of native species whenever appropriate. Protective buffers of complementary habitat will be expected to adjoin these features, sufficient to protect against root damage and support improvement of their long-term condition. A minimum buffer zone of 10m (or greater if required), and of 15m for ancient woodland is considered appropriate.</p> <p>Replacement of existing woodland or hedges with new plantings will not be accepted, even if the size of the land for replacement is significantly bigger than the original.</p> <p>iv. Proposals will be expected to protect and enhance locally important biodiversity sites and other notable ecological features of conservation value.</p> <p>v. Where adverse impacts are unavoidable, exceptional circumstances exist that outweigh any harm or damage to a species or habitat, appropriate mitigation and compensation measures must be employed, commensurate to the importance, the legal protection or other status of the species or habitat. The Council will impose conditions / planning obligations</p>		

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on the Habitats Sites?	Recommendations
	<p>which seek to:</p> <ul style="list-style-type: none"> a. Facilitate the survival of existing populations as well as encouraging the establishment of new populations; b. Reduce disturbance to a minimum; c. Provide adequate alternative habitats to sustain at least the current levels of populations. vi. Development adjoining rivers or streams must provide a minimum of an 8m buffer of complementary habitat between the built environment and top of the bank of the watercourse. Details must be supplied of ongoing ecologically beneficial management of buffer habitats. Where possible, opportunities should be taken to restore degraded aquatic environments to a more semi natural condition. vii. Integrated bird (e.g. swift) and bat boxes will be expected in all buildings bordering public green space and beneficial habitat. viii. Protected species: Sarratt Parish hosts a number of species protected by the 1981 Wildlife and Countryside Act. These include badgers, water voles, bats, great crested newts and breeding birds (seasonal). It also welcomes deer (both Muntjac and Roe), foxes and 		

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on the Habitats Sites?	Recommendations
	<p>a large variety of birds. According to Natural England, the area contains level 3 'Arable Assemblage farmland birds', which includes the turtle dove, snipe, and yellow wagtail. Please refer to the Herts and Middlesex Wildlife Trust, Any development that would undermine the slow recovery of these valued species would be unfavourably looked on.</p>		
<p>Policy 7: Landscape</p>	<p>Development proposals will be required to respect and, wherever possible, enhance the special characteristics, value and visual amenity of the parish landscapes. Examples of this would be views of the Chess Valley or of the open fields that surround habitations.</p>	<p>No, Category A</p>	<p>No specific recommendations</p>
<p>Policy 8: Footpaths and Bridleways</p>	<p>There is a presumption against the loss of a public footpath or bridleway. Where a proposal requires an existing footpath or bridleway to be re-routed, the applicants will be expected to provide evidence that shows footpaths/bridleways will be re-provided elsewhere and will be of the same or enhanced quality (including width) in terms of distance, quality and in an equally suitable location to service its function.</p>	<p>No, Category A</p>	<p>No specific recommendations</p>
<p>Policy 9: Community</p>	<p>There is a presumption against the loss of any community facility</p>	<p>No, Category A</p>	<p>No specific recommendations</p>

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on the Habitats Sites?	Recommendations
Facilities	<p>unless it can be demonstrated that:</p> <ul style="list-style-type: none"> • its continued use as a community facility is no longer viable or • it is no longer required by the community; and • there is no reasonable prospect of securing an alternative community use of the land or premises. <p>Proposals that ensure the retention, improve the quality, and/or extend the range of community facilities in a suitable location within the Parish will be supported.</p>		
Policy 10: Car Parking	<p>There will be a presumption against the loss of car parking provision in Sarratt Village unless applicants can provide evidence as follows:</p> <ol style="list-style-type: none"> a. It can be demonstrated to the satisfaction of the Three Rivers District Council in consultation with Sarratt Parish Council and the Highway Authority that the loss of parking will not have a severe adverse impact on parking provision and/or road safety in the village; or; b. Adequate and suitable replacement car parking provision is provided on or adjacent to the site or a nearby suitable location in 	No, Category A	No specific recommendations

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on the Habitats Sites?	Recommendations
	<p>the village.</p> <p>c. All new housing development schemes will need to demonstrate why any roadways where on-street parking is proposed would be appropriate. Sufficient unallocated parking provision for visitors should be provided and to be marked as such.</p> <p>For the avoidance of doubt, the standards for residential off-street parking for new residential development are set by TRDC, but are considered a minimum level of provision. However, provision above these standards must be justified specifically in relation to the development in question, as over provision would be detrimental to the rural nature of the village.</p>		
<p>Policy 11: Local Green Spaces</p>	<p>Policy 11.1:</p> <p>Subject to the provisions of the NPPF, the following land as identified on the map in Appendix VI will be designated as 'Local Green Space' due to its mixture of community, recreational, historic or environmental value:</p> <ul style="list-style-type: none"> • Chess Valley/Sarratt Bottom • Commonwood Common • Dawes Common 	<p>No, Category A</p>	<p>No specific recommendations</p>

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on the Habitats Sites?	Recommendations
	<ul style="list-style-type: none"> • King George V Field • The Green Sarratt <p>Policy 11.2: The management and development within areas of Local Green Space will be consistent with that for development within Green Belt and the requirements of Areas of Outstanding Natural Beauty, Conservation Areas and Sites of Special Scientific Interest.</p> <p>Policy 11.3: Applications for development of existing recreation land and facilities must be accompanied by an assessment of the current or last use of the facilities and their viability, together with proposals to mitigate any material loss to the community.</p>		
<p>Policy 12: Renewable Energy & Green Infrastructure</p>	<p>Development proposals should seek to achieve the highest standards of sustainability and decarbonisation. Where there are potential conflicts with other policies such as Conservation Area restrictions, then those policies should take precedence but practical exemptions should be applied. For example, solar panels should be installed in developments in Conservation Areas but not on street-facing</p>	<p>No, Category A</p>	<p>No specific recommendations</p>

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on the Habitats Sites?	Recommendations
	<p>aspects.</p> <p>Development proposals that aim to exceed any current energy efficiency and environmental impact regulations will be looked upon favourably (e.g. zero carbon ready).</p> <p>Proposals should demonstrate how the development would facilitate Powering down (reduce the energy demand and consumption) and also Powering up (increasing use of renewable and carbon neutral energy sources).</p> <p>The use of the following are positively encouraged in any new development or in changes to existing developments, and their incorporation should be highlighted:</p> <ul style="list-style-type: none"> • Sustainable construction methods that reduce the impact of the build process; • Fabric first approach - maximising the performance of the components and materials that make up the building fabric itself, before considering the use of mechanical or electrical building services systems. This includes techniques such as passive solar design, choice of construction materials, insulation, envelope air leakage, ventilation and standard of construction, as well as aspect and orientation of layout, such as 		

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on the Habitats Sites?	Recommendations
	<p>natural daylight sources or south-facing roof slopes to maximise the use of solar panels or available land for ground source heat pumps;</p> <ul style="list-style-type: none"> • Renewable and low-carbon or zero carbon technologies such as photovoltaic panels, solar thermal panels and heat pumps; • Locally produced materials (such as flints) and recycled materials (such as old bricks) that both meet design guidelines and have a lower carbon footprint owing to fewer transport miles; • Steps to encourage the use of sustainable modes of transport – including walking, cycling and public transport - such as an undercover bike park for every house; • Electric Vehicle charging points should, where practical, be installed for all new residential developments. Their eventual configuration and charging capacity should be appropriate to the development, from single charging points for individual houses to communal points for flats or shared parking areas; • Ensuring that the development will facilitate the use of, and recycling of, all resources including water, such as the provision of rainwater collection tanks and grey 		

Policy Number	Policy Wording	Will Policy have Likely Significant Effects on the Habitats Sites?	Recommendations
	water recycling; • Impact of the development on the local environment, such as management of surface water and support for biodiversity.		

4.5.1 Recommendations

There are no recommendations for the policies in this Neighbourhood Plan as they have all been assigned to Category A. There will therefore be no need for any residential development subsequently coming forward under this Plan to be subject to a project level HRA. As such there is no requirement for this Plan to progress to Appropriate Assessment.

As the parish of Sarratt lies outside the individual Zones of Influence for the Habitats sites within scope, there are no predicted effects from the Plan alone and no residual effects to consider in combination with other plans and projects.

There is therefore no need to identify any relevant plans or projects likely to result in a significant effect on Habitats sites.

In the context of this HRA, there are no relevant plans or projects to be considered in combination with Sarratt Neighbourhood Plan.

5. Conclusions

5.1 Strategic Environmental Assessment (SEA)

The Neighbourhood Plan has been prepared for town and country planning purposes and sets a framework for future development consent. The policies of the Neighbourhood Plan can be considered to determine the use of small areas at local level commensurate with their status in determining local planning applications.

Planning Practice Guidance on SEA of Neighbourhood Plans indicates that a strategic environmental assessment may be required, for example, where a neighbourhood plan allocates sites for development; the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan; or the neighbourhood plan is likely to have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan.

The Plan does not allocate any land for development purposes and seeks to strengthen the protection and enhancement of sensitive natural or heritage assets at the local level and in a local context.

In consideration of the findings of this Screening Report, the Sarratt Neighbourhood Plan can be **screened out** for its requirement of Strategic Environmental Assessment in line with the requirements of Directive 2001/42/EC.

Following consultation, the statutory bodies (Environment Agency, Historic England, and Natural England) all concur with the findings of this Screening Report that the preparation of a Strategic Environmental Assessment is not required.

5.2 Habitats Regulations Assessment (HRA)

This HRA Screening Report indicates that, with mitigation embedded, the Sarratt Neighbourhood Plan is not predicted to have any Likely Significant Effects on the designated features of any Habitats site, either alone or in combination with other plans and projects. The requirement for the Plan to undertake further assessment under the Conservation of Habitats and Regulations 2017 (as amended) is therefore **screened out**.

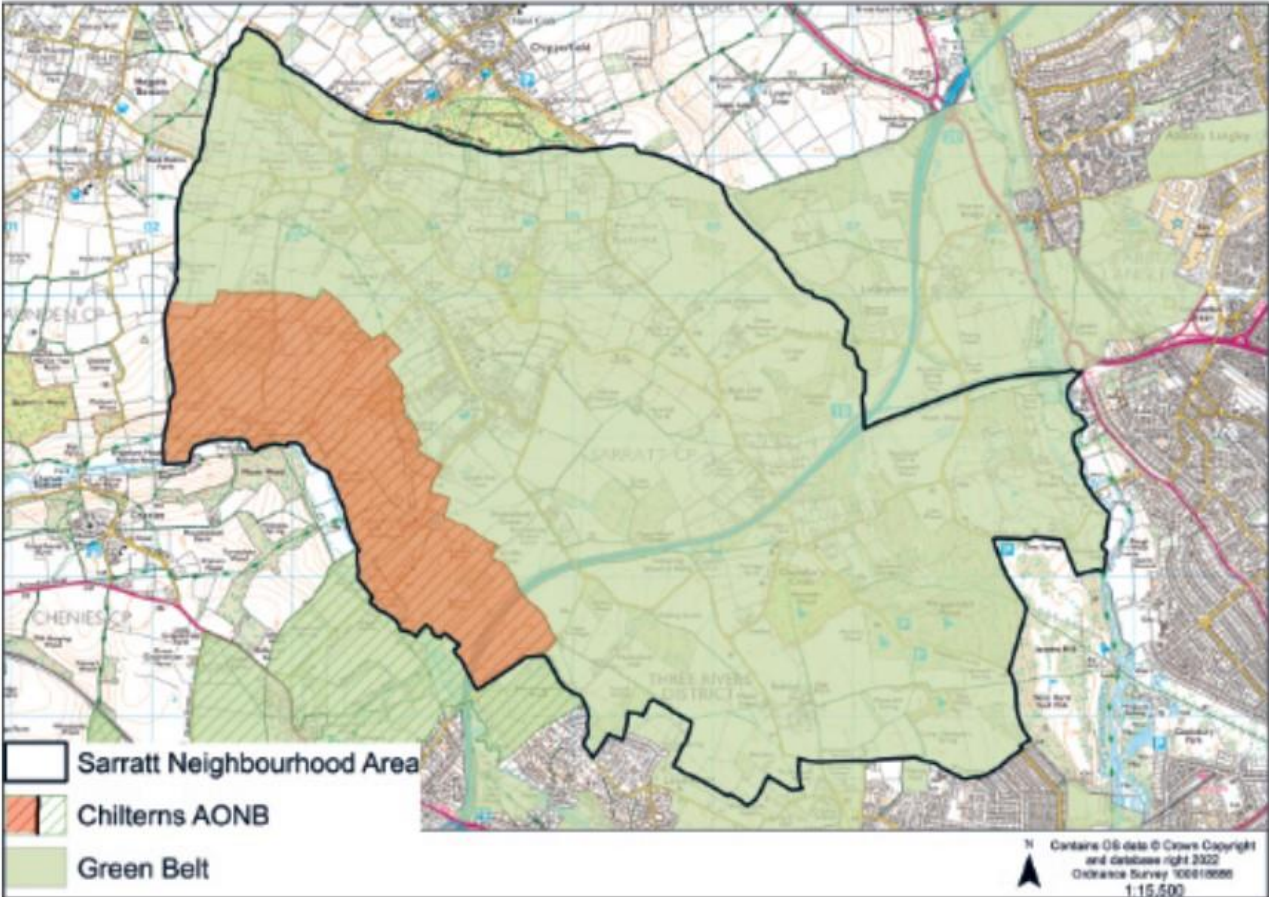
Following consultation, Natural England concur with the findings of this Screening Report that further assessment under the Conservation of Habitats and Regulations 2017 (as amended) is not required.

6. References

- Burnham Beeches Special Area of Conservation Strategic Access Management and Monitoring Strategy SPD (Buckinghamshire Council, November 2020)
- Natural England Conservation objectives for European Sites: East of England Website
- Natural England Letter to (March 2022)
- Panter.C, Liley. D, Lake. S, Saunders. P & Caals. Z, Visitor survey, recreation impact assessment and mitigation requirements for the Chilterns Beechwoods SAC and the Dacorum Local Plan (February 2022)
- Sarratt Neighbourhood Plan (March 2022)
- Three Rivers District Council DPD (adopted 2011)
- Tydlesley, D., and Chapman, C., (2013) The Habitats Regulations Assessment Handbook, (April 2022) edition UK: DTA Publications Limited

Appendix 1

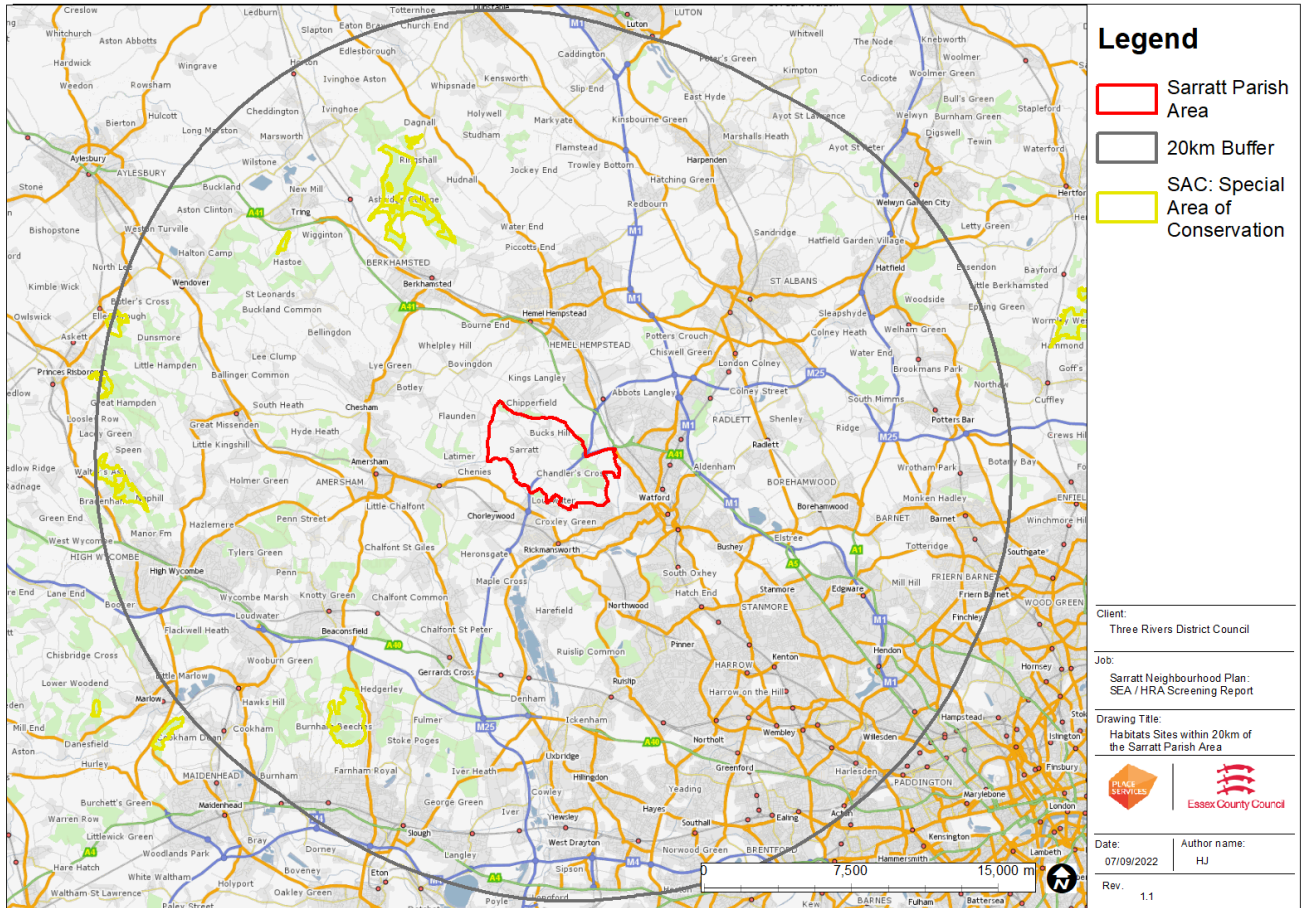
The Sarratt Neighbourhood Plan area



Source: Sarratt Neighbourhood Plan

Appendix 2

The Sarratt Parish and Locations of the Habitats sites within 20 km



Source: Place Services, 2022



Place Services

County Hall, Essex CM1 1QH

T: +44 (0)3330 136 844

E: enquiries@placeservices.co.uk

www.placeservices.co.uk

[@PlaceServices](https://twitter.com/PlaceServices)



Essex County Council