

Finchampstead Neighbourhood Plan

Habitats Regulation Assessment

Finchampstead Parish Council

August 2022

Quality information

<u>Prepared by</u>	<u>Checked by</u>	<u>Verified by</u>	<u>Approved by</u>
Madeleine Bunn Graduate ecologist	Amelia Kent Senior Ecologist	Dr James Riley Technical Director (HRA)	Dr James Riley Technical Director (HRA)

Revision History

<u>Revision</u>	<u>Revision date</u>	<u>Details</u>	<u>Authorized</u>	<u>Name</u>	<u>Position</u>
1	22/08/22	Updated following group comments (Graham Jukes) and local planning authority comments	JR	James Riley	Technical Director
2	24/08/22	Minor amends	JR	James Riley	Technical Director

Distribution List

<u># Hard Copies</u>	<u>PDF Required</u>	<u>Association / Company Name</u>

Prepared for:
Finchampstead Parish Council

Prepared by:
Madeleine Bunn
Ecologist

AECOM Infrastructure & Environment UK Limited
Midpoint, Alencon Link
Basingstoke
Hampshire RG21 7PP
United Kingdom

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

© 2022 AECOM Infrastructure & Environment UK Limited. All Rights Reserved.

This document has been prepared by AECOM Infrastructure & Environment UK Limited (“AECOM”) for sole use of our client (the “Client”) 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. No third party may rely upon this document without the prior and express written agreement of AECOM.

Table of Contents

1. Introduction	5
Background to the Project	5
Legislative Framework	5
2. Methodology	6
Introduction	6
HRA Task 1 – Likely Significant Effects (LSE)	7
HRA Task 2: Appropriate Assessment (AA)	7
HRA Task 3 – Avoidance and Mitigation	8
3. Physical Scope of the HRA	9
Introduction	9
European Sites Relevant to the Neighbourhood Plan	9
Relevant Impact Pathways	10
‘In Combination’ Scope	10
4. Test of Likely Significant Effects	12
Summary of Policy Screening	12
Recreational Pressure	12
Urbanisation	14
Air Quality	15
5. Appropriate Assessment In-combination	18
6. Conclusions	22
7. References	23
Appendix A European Sites Background	25
A.1 Thames Basin Heaths SPA	25
A.2 Thursley, Ash, Pirbright and Chobham SAC	25
Appendix B Policy Screening	27

Plates

Plate 1. Four Stage Approach to Habitats Regulations Assessment (Department for Environment, Food & Rural Affairs, 2021)	7
--	---

Tables

Table 1. European site descriptions and distance from Finchampstead NP area	9
Table 2. Finchampstead Neighbourhood Plan Policy Screening	27

1. Introduction

Background to the Project

- 1.1 AECOM was appointed by Finchampstead Parish Council to assist in undertaking a Habitats Regulations Assessment (HRA) for the Finchampstead Neighbourhood Plan (NP). This is to inform the Parish Council and Wokingham Borough Council of the potential effects of the NP development on European sites and how they are being or should be addressed in the draft NP.

Legislative Framework

- 1.2 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 2019 – make it clear that the need for HRA has continued after the end of the Transition Period.
- 1.3 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’]...’.

- 1.4 It is therefore important to note that this report has two purposes:
- a. To assist the Qualifying Body (Finchampstead Parish Council) in preparing their plan by recommending (where necessary) any adjustments required to protect international sites, thus making it more likely their plan will be deemed compliant with the Conservation of Habitats and Species Regulations 2017 (as amended); and
 - b. On behalf of the Qualifying Body, to assist the Local Planning Authority (Wokingham 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’).
- 1.5 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.

- 1.6 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.

2. Methodology

Introduction

- 2.1 The HRA has been carried out with reference to the general EC guidance on HRA (European Commission, 2001) and general guidance on HRA published by the UK government in 2021 (Department for Environment, Food & Rural Affairs, 2021).
- 2.2 Plate 1 below outlines the stages of HRA according to current Department for Levelling Up, Housing & Communities guidance. 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.

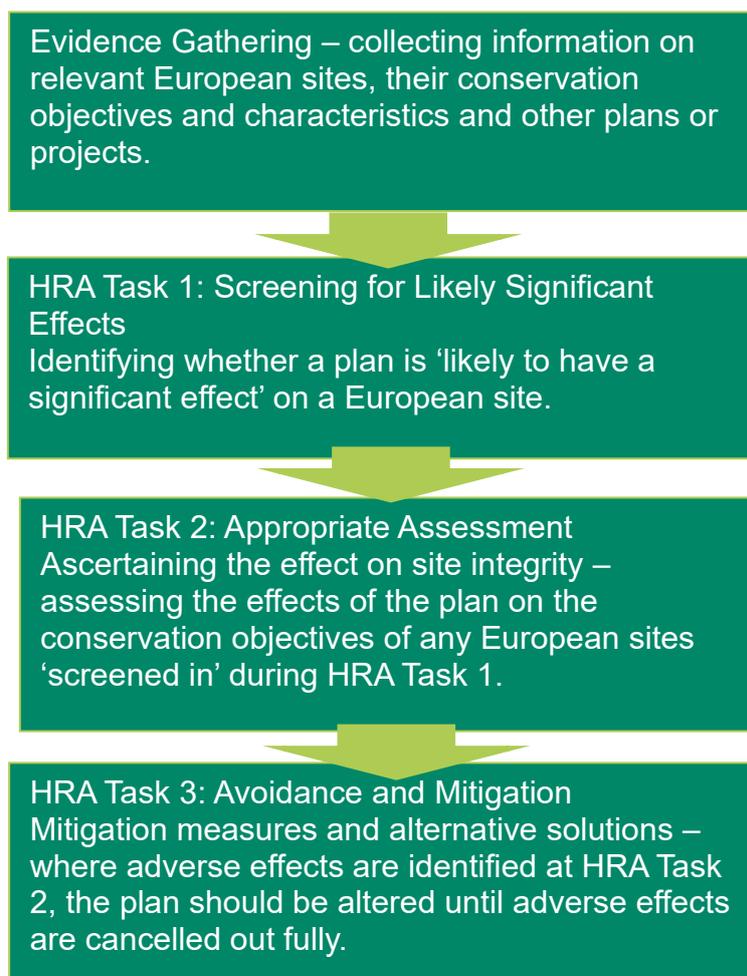


Plate 1. Four Stage Approach to Habitats Regulations Assessment (Department for Environment, Food & Rural Affairs, 2021)

HRA Task 1 – Likely Significant Effects (LSE)

2.3 Following evidence gathering, the first stage of any Habitats Regulations Assessment is a Likely Significant Effect (LSE) 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 European 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 European sites, usually because there is no mechanism for an adverse interaction with European sites. This stage is undertaken in Chapter 4 of this report.

HRA Task 2: Appropriate Assessment (AA)

2.5 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 European sites'*.

- 2.6 During July 2019 the Department for Levelling Up, Housing and Communities (DLUHC) published guidance for Appropriate Assessment (Department for Levelling Up, Housing and Communities, 2019). 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'*.
- 2.7 One of the key considerations during Appropriate Assessment is whether there is available mitigation that would address the potential effect.

HRA Task 3 – Avoidance and Mitigation

- 2.8 Where necessary, measures are recommended for incorporation into the Plan in order to avoid or mitigate adverse effects on European sites. There is considerable precedent concerning the level of detail that a Neighbourhood Plan document needs to contain regarding mitigation for recreational impacts on European 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.
- 2.9 In evaluating significance, AECOM has relied on professional judgement and the LP HRA regarding development impacts on the European sites considered within this assessment.
- 2.10 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 Plan.

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 European designated 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 European 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.

European Sites Relevant to the Neighbourhood Plan

- 3.3 In the case of the Finchampstead NP, it has been determined that the European sites identified in Table 1 require consideration. The background to these European sites are discussed in **Appendix A**.

Table 1. European site descriptions and distance from Finchampstead NP area

Site Name/ Designation	Site Description	Distance from Finchampstead Neighbourhood Area
Thames Basin Heaths SPA	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. 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	0.1km south at closest point

Site Name/ Designation	Site Description	Distance from Finchampstead Neighbourhood Area
	often nests close to the ground amongst dense heather and gorse.	
Thursley Ash, Pirbright and Chobham SAC	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 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.	8.5km south-east

Relevant Impact Pathways

- 3.4 The European sites that are described in Table 1 and Appendix A are located within a 10 km radius of the Finchampstead NP area. Although Chilterns Beechwoods SAC is considered in the Wokingham Local Plan HRA, it is located 18km from Finchampstead Parish, which is therefore well beyond the zone of influence of the SAC.
- 3.5 Based upon Natural England Site Improvement Plans and Supplementary Advice on Conservation Objectives, there are several pathways that require consideration regarding increased development within the Finchampstead NP area and said European sites. These are:
- Public access and recreation
 - Air Quality

‘In Combination’ Scope

- 3.6 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 European site(s) in question.
- 3.7 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.

3.8 For the purposes of this assessment, we have determined that, due to the nature of the identified impacts, the key other plans and projects with potential for in combination likely significant effects are those schemes that have the following impact pathways: Recreational pressure, air quality impacts, water quality impacts and water quantity level and flow. The following plans have been assessed for their in-combination impact to interact with the Finchampstead Neighbourhood Plan:

- Hart Local Plan 2016-2032 (adopted)
- Crowthorne Neighbourhood Plan 2018 – 2036 (made)
- Bracknell Town Neighbourhood Plan 2016 – 2036 (made)
- Draft Bracknell Forest Council Local Plan (March 2021) (at Examination)
- Arborfield & Barkham Neighbourhood Plan 2019-2036 (made)
- Shinfield Neighbourhood Plan 2015-2026 (made)
- Wokingham Borough Local Plan Update Draft 2018-2036 (in progress)

4. Test of Likely Significant Effects

Summary of Policy Screening

One of the Neighbourhood Plan policies has the potential to cause a likely significant effects:

- ADH1 - Development outside Development Limits. Five sites have been explicitly identified as being 'acceptable for development'. If these sites were allocated there would be a net increase of 184 new dwellings. Of these, two sites are new allocations made in the Neighbourhood Plan rather than carried forward from the Local Plan.

These are:

- 5FI014 Land rear of 6-8 The Village 2 Units; and
- 5FI016 Broughton Farm, Heath Ride 2 Units

4.1 It should be noted that the other three sites mentioned as suitable for development in the Neighbourhood Plan (5FI1003 31/33 Barkham Ride, 5FI1004 Green Acres Farm, Nine Mile Ride and 5FI1028 Westwood Cottage, Sheerlands Road are allocations that are being made through the emerging Local Plan process. The SEA / HRA process in relation to those sites is already being addressed through the emerging Local Plan and they are mentioned here only for consistency and completeness. The remaining 2 sites (comprising 4 dwellings) in The Village and at Broughton Farm are not current allocations in the Local Plan.

Recreational Pressure

4.2 Recreational use of a European site has the potential to:

- Prevent appropriate management or exacerbate existing management difficulties;
- Cause damage through erosion and fragmentation;
- Cause eutrophication as a result of dog fouling; and
- Cause disturbance to sensitive species, particularly ground-nesting birds and (where relevant) wintering wildfowl.

4.3 Different types of European sites are subject to different types of recreational pressures and have different vulnerabilities. Studies across a range of species have shown that the effects from recreation can be complex. The Thames Basin Heaths SPA is an important recreational site for a variety of different major settlements within the SPA 5km influence zone, these include: Farnham, Farnborough, Fleet, Hartley Wintney and parts of Yateley.

4.4 It should be emphasised that recreational use is not inevitably a problem. Many European sites also contain nature reserves managed for conservation and public appreciation of nature. Parts of the Wealden Heaths Phase II SPA, for example, are managed by the National Trust. At these sites, access is encouraged and resources are available to ensure that recreational use is managed appropriately.

Mechanical/Abrasive Damage and Nutrient Enrichment

- 4.5 Most types of terrestrial European site can be affected by soil compaction and erosion, which can arise as a result of visits by walkers, cyclists, horse-riders and users of off-road vehicles. Walkers with dogs contribute to pressure on sites through nutrient enrichment via dog fouling and also have potential to cause greater disturbance to fauna as dogs are less likely to keep to marked footpaths and move more erratically. Motorcycle scrambling and off-road vehicle use can cause serious erosion, as well as disturbance to sensitive species.
- 4.6 The Thames Basin Heaths SPA is internationally designated site for species that could be adversely affected by the impacts of excessive trampling and erosion to their supporting habitats. Additionally, visitors from Finchampstead may choose to visit internationally designated sites outside of the area that may also be sensitive to such impacts. Direct mechanical trampling and nutrient enrichment are both more subtle and reversible effects than disturbance of nesting bird populations.

Disturbance

- 4.7 Concern regarding the effects of disturbance on birds stems from the fact that they are expending energy unnecessarily and the time they spend responding to disturbance is time that is not spent feeding. Disturbance therefore risks increasing energetic output while reducing energetic input, which can adversely affect the 'condition' and ultimately survival of the birds. In addition, displacement of birds from one feeding site to others can increase the pressure on the resources available within the remaining sites, as they have to sustain a greater number of birds.
- 4.8 Human activity can affect birds either directly (e.g. through causing them to flee) or indirectly (e.g. through damaging their habitat). The most obvious direct effect is that of immediate mortality such as death by shooting, but human activity can also lead to behavioural changes (e.g. alterations in feeding behaviour, nest abandonment, avoidance of certain areas etc.) and physiological changes (e.g. an increase in heart rate) that, although less noticeable, may ultimately result in major population-level effects by altering the balance between immigration/birth and emigration/death.
- 4.9 The factors that influence a species response to a disturbance are numerous, but the three key factors are species sensitivity, proximity of disturbance sources and timing/duration of the potentially disturbing activity. The most detailed consideration of the link between relative recreational pressure on European sites and damage to interest features has been carried out with regard to the Thames Basin Heaths SPA.
- 4.10 After extensive research, Natural England and its partners produced the Thames Basin Heaths Special Protection Area Delivery Framework which made recommendations for accommodating development while also protecting the interest features of the European site. This included the recommendation of implementing a series of zones within which varying constraints would be placed upon development (see South-East Plan Policy NRM6). The zones relating to recreational pressure extended to 5km (as this was determined from visitor surveys to be the principal recreational catchment for this European site). At distances from the SPA of 400m-5km the Delivery Framework advises that

development projects should be required to contribute toward provision of Suitable Alternative Natural Greenspace (SANG) and toward access management to the SPA. Additionally Wokingham Borough Council's Impact Avoidance Strategy (including local and strategic measures) for Residential Development upon the Thames Basin Heaths Special Protection Area details that large site allocations of more than 50 dwellings located between 5km and 7km of the Thames Basin Heaths SPA 'will be assessed on an individual basis'.

- 4.11 Where increased recreational use is predicted to cause adverse impacts on a site, avoidance and mitigation should be considered. Avoidance of recreational impacts at European sites involves location of new development away from such sites; Local Development Frameworks (and other strategic plans) provide the mechanism for this. Where avoidance is not possible, mitigation will usually involve a mix of access management, habitat management and provision of alternative recreational space.
- 4.12 Finchampstead Neighbourhood Plan has identified sites suitable to deliver up to 184 new dwellings in the parish over the plan period and the closest site to the Thames Basin Heaths SPA is 1.9km distant (5FI028 Westwood Cottage, 10 dwellings). At an average occupancy rate of 2.4 people per dwelling, if all 184 dwellings were occupied by people who do not currently live within 5km of the SPA this would be c. 442 new residents and not all of those new residents would visit the SPA regularly given the distance and the large amount of alternative available natural recreational greenspace around Finchampstead parish.
- 4.13 A total of 478 net new dwellings, with the closest c. 2km from the SPA, would in itself be unlikely to result in significant disturbance effects on the SPA. However, growth within Finchampstead must be considered 'in combination' with all other net new residential growth in the Wokingham Local Plan and in all other Local Plans and Neighbourhood Plans within 5km of the Thames Basin Heaths SPA. This totals 30,000 net new dwellings to c. 2030 and a greater amount of housing beyond that date. As such likely significant effects through disturbance cannot be dismissed when the Neighbourhood Plan is considered in combination with other plans and projects. Therefore, an appropriate assessment is required.

Urbanisation

- 4.14 Urbanisation impacts result from increased populations within close proximity to sensitive European sites. The detail of the impacts is distinct from the trampling, disturbance and dog-fouling that results specifically from recreational activity (considered in the subsequent section relating to Recreational Pressure and Disturbance). The list of urbanisation impacts can be extensive, but core impacts can be singled out:
- Increased fly-tipping
 - Cat predation
 - Uncontrolled fires
- 4.15 After extensive research, Natural England and its partners produced the Thames Basin Heaths Special Protection Area Delivery Framework which made recommendations for accommodating development while also protecting the interest features of the European site. This included the recommendation of implementing a series of zones within which varying constraints would be placed

upon development. This strategic requirement was included within Policy NRM6 of the South-East Plan saved overarching policy and the Thames Basin Heaths Special Protection Area Delivery Framework agreed by all the affected local authorities and Natural England. It is also reflected in policy CP8 of Wokingham Borough Council's Core Strategy. These set out the principles of avoidance and mitigation to avoid harm to the TBHSPA arising from new housing development. These measures include:

- Directing development to those areas where potential adverse effects can be avoided without the need for mitigation measures;
- The establishment of a 400 metre buffer zone around the TBHSPA within which no net new housing development will be supported;
- The provision of Suitable Alternative Natural Greenspace (SANG);
- Contributions towards Strategic Access Management and Monitoring (SAMM) measures.

4.16 Concerning aspects of urbanisation (particularly predation of the chicks of ground-nesting birds by domestic cats) was determined at 400m from the SPA boundary. The delivery plan concluded that the adverse effects of any residential development located within 400m of the SPA boundary could not be mitigated in part because this was the range over which cats and people could be expected to roam as a matter of routine and there was no realistic way of restricting their movements, and as such, no new housing should be located within this zone.

4.17 Wokingham Borough Council core strategy Policy CP8: Thames Basin Heaths Special Protection Area states:

4.18 *'Within 400m (linear) of the TBH SPA, the authority and Natural England do not consider it is generally possible to avoid impact from development. Therefore, no proposal for residential development will be allowed due to the risks of fires, fly-tipping, cat predation and other impacts'.*

4.19 None of the sites identified as suitable for development in the Neighbourhood Plan lie within 400m of the Thames Basin Heaths SPA. The Neighbourhood Plan therefore complies with the prohibition on net new housing development within 400m of the SPA and that issue does not require further discussion.

Air Quality

4.20 Residential development within Finchampstead parish could affect air quality through increased emissions from vehicle exhausts. There are two measures of primary relevance regarding air quality impacts from vehicle exhausts. The first is the concentration of oxides of nitrogen (known as NO_x) in the atmosphere. In extreme cases NO_x can be directly toxic to vegetation but its main importance is as a source of nitrogen, which is then deposited on adjacent habitats. The guideline atmospheric concentration advocated by Government for the protection of vegetation is 30 micrograms per cubic metre (µg_m⁻³), known as the Critical Level, as this concentration relates to the growth effects of nitrogen derived from NO_x on vegetation.

4.21 The second important metric is a measure of the rate of the resulting nitrogen deposition. The addition of nitrogen is a form of fertilization, which can have a negative effect on woodlands and other habitats over time by encouraging more

competitive plant species that can force out the less competitive species that are more characteristic. Unlike NO_x in atmosphere, the nitrogen deposition rate below which we are confident effects would not arise is different for each habitat. The rate (known as the Critical Load) is provided on the UK Air Pollution Information System (APIS) website (www.apis.ac.uk) and is expressed as a quantity (kilograms) of nitrogen over a given area (hectare) per year ($\text{kgNha}^{-1}\text{yr}^{-1}$).

- 4.22 Emissions of NO_x and resulting deposition can have community level impacts to habitats and European Sites. Habitats that are particularly sensitive to elevated nitrogen levels are calcareous grasslands this is because naturally these grasslands occur in low nutrient concentrations (i.e. shallow and well buffered soil). As a result of low nutrient availability these habitats tend to be rich in species diversity. However, the addition of nitrogen to this habitat adds a limiting factor that benefits only those species better adapted (i.e. more suitable) to higher nitrogen levels. Those species better adapted to higher nitrogen levels are able to out-compete less adapted species leading to a loss in species richness, and under severe nitrogen deposition this can lead to the loss of the entire habitat.
- 4.23 The routes that nitrogen deposition impacts habitats and vegetation as described above are through environmental changes, toxicity and the movement of nitrogen through trophic levels. Another route of effect is through nitrogen acidification. For example, a study undertaken by Maskell et al (2010) observed that with increasing acid deposition from NO_x there was a decrease in species richness within heathland. Acid deposition can have serious impacts to the health of soil structure and the microbial communities found here. These species carry out a natural decaying process known as nitrification (converting ammonium to nitrate) that generates acidity. However, when in combination with acid deposition from NO_x pollution the soil pH may become too acidic for specialised plant communities to survive and result in a net decrease in biodiversity. Acidification tends to be more of an issue for acid substrates, which have poor buffering capacity (i.e. heathland), than neutral or calcareous substrates.

Thames Basin Heaths SPA

- 4.24 Nightjar, woodlark and Dartford warbler, the qualifying species of the Thames Basin Heaths SPA, are not directly sensitive to atmospheric pollution. However, atmospheric nitrogen deposition has the potential to affect these species through indirect effects on these species' broad habitats, notably areas of heathland or acid grassland, if it is sufficiently extensive to materially change habitat structure, depending on management. APIS highlights that European dry heaths, which all these species depend on, have a critical nitrogen load of 10-20 kg N/ha/yr. Exceedance of this critical load would lead to a transition from heather to coarse grass dominance and therefore change how the qualifying birds are able to use the micro-habitats in heathland.
- 4.25 The Wokingham Local Plan HRA will be informed by traffic and air quality modelling which will take account of all planned growth within the borough. This will then inform any strategic need for traffic-related air quality mitigation. While two sites are being allocated in the Neighbourhood Plan and are not reflected in the Local Plan, the modelling undertaken for the Local Plan will take account of all 'in combination' traffic growth in accordance with legislation.

4.26 Moreover, these two new allocations (5FI014 Land rear of 6-8 The Village and 5FI016 Broughton Farm, Heath Ride) will total a maximum of four net new residential dwellings and are therefore unlikely to result in a visible change in any traffic modelling undertaken for the Local Plan as any traffic generated on roads through the SPA is likely to amount to less than 1 Annual Average Daily Traffic (AADT). Very small changes to 24hr AADT flows (e.g. single figure AADT or below such is likely from this Neighbourhood Plan) would not materially alter the Local Plan air quality modelling results (and thus ecological effects), and would thus be essentially nugatory, for two reasons:

- Firstly, daily traffic flows are not fixed numerals but fluctuate from day to day. The AADT for a given road is an annual average (specifically, the total volume of traffic for a year, divided by 365 days). It is this average number that is used in air quality modelling, but the 'true' flows on a given day will vary around this average figure. Small changes in average flow will lie well within the normal variation (known as the standard deviation or variance) and would not make a statistically significant difference in the total AADT.
- Secondly, when converted into NO_x concentrations, ammonia concentrations or nitrogen deposition rates, our experience is that very small changes in AADT (tens of AADT) would only affect the third decimal place. The third decimal place is never reported in air quality modelling to avoid false precision. For this reason, pollution is generally not reported to more than 2 decimal places (0.01). Anything smaller is simply reported as less than 0.01 (< 0.01) i.e. probably more than zero but too small to model with precision.

4.27 Air quality is therefore not discussed further in this report and the Thames Basin Heaths SPA is screened out from Appropriate Assessment.

Thursley, Ash, Pirbright & Chobham SAC

4.28 Thursley, Ash, Pirbright & Chobham SAC is designated for its depressions on peat substrates, Northern Atlantic wet heaths and European dry heaths. From an atmospheric pollution perspective, the lowland fens and mire habitats (depressions on peat substrates) are most sensitive (critical nitrogen load of 10-15 kg N/ha/yr). However, both the wet and dry heath habitats are also sensitive to atmospheric nitrogen deposition (both have critical nitrogen loads of 10-20 kg N/ha/yr).

4.29 Considerable parts of the SAC are located near major roads. For example, in the authority of Surrey Heath, the M3 runs directly past the Lightwater Country Park (which contains heathland elements of the SAC). Further along the M3 (and still within Surrey Heath), lowland fen and heathland habitats in Chobham Common also lie directly adjacent to the M3.

4.30 Review of the Department for Transport's traffic statistics shows that at manual count point 46010, the M3 had an AADF of 96,243 cars, 17,282 light goods vehicles and 8,686 heavy goods vehicles (Department for transport, 2020). However, the 2011 Census Data indicates that Surrey Heath is not a major destination for commuters from Wokingham Borough (it is not among the 10 most popular destinations).

- 4.31 Furthermore, the Transport Assessment Report (2020) has further highlighted how a number of other destinations are more regularly used to commute to, or from Wokingham Borough. The M3 leads through the authorities of Runnymede, Spelthorne and Hounslow. None of these authorities are on the list of the most popular commuter destinations for residents from Wokingham Borough. Furthermore, only 2.3% (545 out of 23,329 people commuting by car) of the total inflow into Wokingham Borough comes from Surrey Heath.
- 4.32 Moreover, the M3 at Lightwater Country Park is in a cutting, separated from the SAC by a high, 30m wide densely tree-covered embankment, while the area of SAC that lies within 30-100m of the M3 at Chobham Common is mown as a firebreak; this is also the zone that would be subject to the greatest increase in nitrogen deposition and regular mowing will have a much greater effect on botanical composition and habitat structure than nitrogen deposition.
- 4.33 **Given that there is no significant link between commuter traffic arising from the Finchampstead Neighbourhood Plan and the Thursley, Ash, Pirbright and Chobham SAC, this is screened out from Appropriate Assessment.**

5. Appropriate Assessment

- 5.1 Impact pathways that have potential to link to the Neighbourhood Plan and to act in-combination with other projects or plans are as follows:
- Recreational Pressure to the Thames Basin Heaths SPA due to the allocation of two sites that are not already allocated in the Wokingham Local Plan (5FI014 Land rear of 6-8 The Village, 5FI016 Broughton Farm, Heath Ride) totalling four net new dwellings.
- 5.2 The Thames Basin Heaths SPA 5km zone affects a large number of authorities: Hart, Waverley, Wokingham, Bracknell Forest, Rushmoor, Runnymede, Guildford, Surrey Heath, Elmbridge and Woking. In total approximately 30,000 new dwellings are planned for delivery within 5km of the Thames Basin Heaths SPA over the Neighbourhood Plan period.
- 5.3 In particular, the Wokingham Borough Local Plan Update identifies a total housing requirement of 15,513 new dwellings in the Borough over the period (2018 – 2036).
- 5.4 An earlier version of the Wokingham Borough Local Plan Update consultation was subject to HRA in 2020. The preparation of the Local Plan Update is ongoing and a further HRA was produced in 2021 to accompany the Revised Growth Strategy. The HRAs identified that there are considerable threats to the Thames Basin Heaths SPA within the Wokingham Borough from recreational pressure ‘in combination’ without mitigation. The Local Plan addresses key issues highlighted by the Thames Basin Heaths Delivery Framework. These include, a 400m buffer surrounding the heathlands whereby no new development is permitted to take place (Policy NE2) and devised mitigation strategies for any new developments within the 5km zone of influence (Policy NE2: Thames Basin Heaths Special Protection Area).

- 5.5 Finchampstead is within the 5km catchment of influence for the Thames Basin Heaths SPA. As such the potential proposed development of 184 net new dwellings within Finchampstead could have a direct negative impact to the threatened heathlands when considered in combination with the remaining growth in Wokingham Borough and elsewhere within 5km of the Thames Basin Heaths SPA.

SANG Capacity

- 5.6 The potential new developments within Finchampstead of 184 new dwellings could cumulatively increase visitor numbers to the Thames Basin Heaths SPA. Additional visitors to the areas would result in further disturbance and potential damage to the heathlands and the local biodiversity.
- 5.7 In order to alleviate additional recreational pressures faced by the Thames Basin Heaths SPA future developments within Finchampstead are required to provide avoidance measures.
- 5.8 The provision of a Suitable Alternative Natural Greenspace (SANG) to draw new residents away from the European Site is an important measure set out by the Delivery Framework. Individual developments can provide their own SANG but the minimum requirement for SANG are relatively arduous: an area of attractive natural greenspace, not already heavily used for recreation, which is at least 8-10ha in size (necessary to be able to accommodate a 2.4km circular walk) and which meets an overall standard of provision of at least 8ha/1000 population. As a result, it is often the case that only very large developments can provide their own SANG. While that option is open to developers seeking to potentially deliver the 184 dwellings identified in Policy ADH1 of the Finchampstead Neighbourhood Plan, this appropriate assessment makes the precautionary assumption that some or all of the 184 dwellings may have to rely on one of the strategic SANG provided by Wokingham Borough Council or a third party.
- 5.9 Those housing sites which are referenced in the Neighbourhood Plan but are allocated within the Wokingham Local Plan have been assessed in the HRAs of the Local Plan and will continue to be so assessed as the Local Plan is taken forward. The 2020 Wokingham Draft Local Plan Update proposed new land for development, including smaller residential sites across Wokingham Borough. The Revised Growth Strategy HRA assesses the extent of net new housing proposed within 5km and 7km of the Thames Basin Heaths SPA and identifies the amount of SANG that would be required. It also identifies the policies within the emerging Local Plan that would ensure no net new residential development would be permitted without adequate mitigation for European sites, and notes that the Council has identified sufficient strategic SANG provision as part of the avoidance and mitigation measures required for the Development Plan. Wokingham Borough Council are progressing a longer term SANG strategy to support the emerging Local Plan Update.
- 5.10 However, the Neighbourhood Plan allocates two sites for four dwellings that are not allocated in the emerging Local Plan. It is therefore necessary to identify whether there is a strategic SANG with residual capacity located close enough to Finchampstead to serve that settlement and parish. According to the Wokingham Annual Monitoring Report, as of March 2021, there is one site in public control with remaining capacity to avoid impacts of additional dwellings upon the SPA. Rooks Nest Woods is located within Finchampstead parish and is

operated by the council. In February 2021 it had unallocated capacity of 375 dwellings. Other private SANGs are also offer available capacity and can be bought into by developers to mitigate SPA impact. In total according to Figure 2 of the Annual Monitoring Report there are 3 SANG within or adjacent to Finchampstead Parish. It is likely that the potential additional 184 dwellings proposed by the Finchampstead neighbourhood plan will be covered by this existing SANG space. The two allocated sites will require 0.08ha of SANG (assuming standard quality and provision rates). This is small enough to be accommodated within the contingency capacity for windfall sites within the LPU planning period. Wokingham Borough Council have confirmed to the authors of this HRA report that they are confident that there will be no gap in their ability to provide SANG mitigation for the full proposals set out in the FNDP.

- 5.11 Any net new dwellings allocated within the Neighbourhood Plan which will need to rely on the identified SANG will need to make a financial contribution to the delivery of that SANG and its management in perpetuity. as per Wokingham Borough Council Thames Basin Heaths Avoidance Strategy and the tariffs provided on the Wokingham Borough Council website.
- 5.12 Policy ADH1 identifies the need for net new housing to provide SANG or to make a financial contribution to a strategic SANG. The policy includes:
- 5.13 Reference to the constraint imposed by the Thames Basin Heaths and the mitigation strategy set out in the South-East Plan policy NRM6 and policy CP8 from Wokingham Borough Council's Core Strategy to 2026;
- 5.14 Reference to the fact that all net new housing development within Finchampstead will either need to:
- Provide its own Suitable Alternative Natural Greenspace (SANG) at a rate of 8ha/1000 population but also compliant with the other SANG provision criteria developed by Natural England; or
 - Make a financial contribution to Wokingham Borough Council to enable it to be assigned to an appropriate strategic SANG.
- 5.15 With the inclusion of this clear requirement and the confirmation from Wokingham Borough Council that the two sites (four dwellings) allocated within the Neighbourhood Plan can be accommodated within the Borough's strategic SANG capacity, it can be confirmed that no adverse effect on the integrity of the Thames Basin Heaths SPA will arise.

Strategic Access Management and Monitoring Contributions

- 5.16 In addition to SANG provision, it must be noted that all net new residential dwellings within 5km of the Thames Basin Heaths SPA must also provide an appropriate Strategic Access Management and Monitoring (SAMM) contribution in line with the Wokingham Borough Council Thames Basin Heaths Avoidance Strategy (and retained policy NRM6 of the South-East Plan and CP8 from Wokingham Borough Council's Core Strategy to 2026).
- 5.17 This is discussed in the text of Finchampstead Neighbourhood Plan which mentions the need for net new dwellings to make a financial contribution to the Thames Basin Heaths SAMM strategy. It is therefore recommended that the

Neighbourhood Plan is updated to include such a reference, alongside that for provision of SANG contributions.

6. Conclusions

- 6.1 The Neighbourhood Plan sets out detailed policy regarding the need for net new dwellings to provide SANG and SAMM contributions. In addition, Wokingham Borough Council have confirmed that the two allocations made by the Neighbourhood Plan (totalling four dwellings) can be accommodated within the strategic SANG capacity in the borough. It is therefore considered that an adequate policy framework will be in place to ensure no adverse effects on the integrity of the Thames Basin Heaths SPA either alone or in combination with other plans or projects.

7. References

Bracknell Forest Council, 2021. Bracknell Town Neighbourhood Plan 2016 – 2036 [Online] Available at: <https://www.bracknell-forest.gov.uk/sites/default/files/2022-01/bracknell-town-neighbourhood-plan-referendum-plan-oct-2021.pdf> [Accessed 24/05/2022]

Bracknell Forest Council, 2021. Pre-Submission Bracknell Forest Local Plan [Online] Available at: <https://www.bracknell-forest.gov.uk/planning-and-building-control/planning/planning-policy/emerging-bracknell-forest-local-plan/core-submitted-documents> [Accessed 24/05/2022]

Crowthorne Parish Council, 2021. Crowthorne Neighbourhood Plan 2018 – 2036 [Online] Available at: <https://www.bracknell-forest.gov.uk/sites/default/files/2021-08/crowthorne-neighbourhood-plan.pdf> [Accessed 24/05/2022]

Department for Environment, Food & Rural Affairs, 2021. Guidance: Habitats Regulations Assessments: Protecting a European Site. [Online] Available at: <https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site> [Accessed 24/05/2022]

Department for Levelling Up, Housing and Communities, 2019. GOV.UK. [Online] Available at: <https://www.gov.uk/guidance/appropriate-assessment#what-are-the-implications-of-the-people-over-wind-judgment-for-habitats-regulations-assessments> [Accessed 24/05/2022]

Department for transport, 2020. Road traffic statistics, Site number: 46010 [Online] Available at: <https://roadtraffic.dft.gov.uk/manualcountpoints/46010> [Accessed 24/05/2022]

European Commission, 2001. Assessment of plans and projects significantly affecting Natura 2000 sites. Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC. Luxembourg: Office of Official Publications of the European Communities

Hart district council, 2020. Hart local plan (Strategy AND Sites) 2032 [Online] Available at: https://www.hart.gov.uk/sites/default/files/4_The_Council/Policies_and_published_documents/Planning_policy/Hart%20LPS%26S.pdf [Accessed 24/05/2022]

JNCC (2019). Thursley, Ash, Pirbright and Chobham SAC. [Online] Available at: <https://sac.jncc.gov.uk/site/UK0012793> [Accessed 21st April 2022].

Natural England, 2016. European Site Conservation Objectives: Supplementary Advice on Conserving and Restoring Site Features Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC) Site code: UK0012793 [Online] Available at: <http://publications.naturalengland.org.uk/publication/5141075941392384> [Accessed 21st April 2022].

Natural England, 2016. European Site Conservation Objectives: Supplementary Advice on Conserving and Restoring Site Features Thames Basin Heaths Special Protection Area (SPA) Site Code: UK9012141 [Online] Available at: <http://publications.naturalengland.org.uk/publication/4952859267301376> [Accessed 21st April 2022].

Natural England, 2018. European Site Conservation Objectives for Thames Basin Heaths SPA (UK9012141) [Online] Available at: <http://publications.naturalengland.org.uk/publication/4952859267301376> [Accessed 21st April 2022].

Natural England, 2018. European Site Conservation Objectives for Thursley, Ash, Pirbright & Chobham SAC (UK0012793) [Online] Available at: <http://publications.naturalengland.org.uk/publication/5141075941392384> [Accessed 21st April 2022].

Surrey heath borough council (2019). Thames Basin Heaths SPA avoidance strategy supplementary planning document 2019 [Online] Available at: <https://www.surreyheath.gov.uk/sites/default/files/Thames%20Basin%20Heaths%20Special%20Protection%20Area%20SPD%202019.pdf> [Accessed 21st April 2022].

Wokingham borough council, 2021. Draft Local Plan [Online] Available at: <https://www.wokingham.gov.uk/planning-policy/planning-policy-information/draft-local-plan-consultation/?assetdet91f252ff-550d-4cfa-a838-92ef2cb5f83c=509079&categoryesct91f252ff-550d-4cfa-a838-92ef2cb5f83c=10722&p=2> [Accessed 24/05/2022]

Wokingham Borough Council, 2021. Arborfield & Barkham Neighbourhood Plan 2019-2036 [Online] Available at: <https://www.wokingham.gov.uk/planning-policy/planning-policy-information/neighbourhood-planning/> [Accessed 24/05/2022]

Wokingham Borough Council, 2022. Updated Thames Basin Heath Avoidance Strategy [Online] Available at: <https://www.woking2027.info/supplementary/tbhspaspd/strategy2022.pdf> [Accessed 24/05/2022]

Appendix A European Sites Background

A.1 Thames Basin Heaths SPA

Conservation Objectives

- 7.1 With regard to the SPA and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change:
- 7.2 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, 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 population of each of the qualifying features, and,
 - The distribution of the qualifying features within the site.

Qualifying Features

- *Caprimulgus europaeus*; European nightjar (Breeding)
- *Lullula arborea*; Woodlark (Breeding)
- *Sylvia undata*; Dartford warbler (Breeding)

Environmental Vulnerabilities

- 7.3 Recreation has been identified as a key impact pathway to the SPA. All 3 species of bird the site is designated for nest on the ground or at low level and so are easily disturbed or harmed by human activity. In particular, this includes recreational activity such as dog walking. Predation by domestic cats is also a risk factor, as is the potential for fly tipping and arson on the heathland habitat.

A.2 Thursley, Ash, Pirbright and Chobham SAC

Conservation Objectives

- 7.4 With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change:
- 7.5 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure 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, and
 - The supporting processes on which qualifying natural habitats rely
- Qualifying Features

7.6 Annex I habitats that are a primary reason for selection of this site:

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 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, European 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.

Environmental Vulnerabilities

- Changes in hydraulic conditions
- Grazing
- Succession
- Air pollution by air-borne pollutants
- Other human intrusions and disturbances

Appendix B Policy Screening

Table 2. Finchampstead Neighbourhood Plan Policy Screening

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
ES1 - Environmental standards for residential development	<p>This policy details the environmental standards to be applied to new developments including:</p> <ul style="list-style-type: none"> • 19% improvement in the dwelling emission rate over the target emission rate • Major residential development will be expected to be designed to achieve carbon neutral homes. • Conversions to residential and extensions to existing dwellings of 500 sqm of residential floorspace (gross) or more, should achieve 'excellent' in domestic refurbishment. • Provision is made for charging for electric vehicles in all domestic dwellings where garages or vehicle parking spaces are provided 	<p>No likely significant effects.</p> <p>The policy is a development management policy and does not have any linking impact pathways.</p>
ADH1 - Development outside Development Limits	<p>Development proposals for permanent rural workers dwellings in the countryside will be supported when it can be demonstrated that a genuine need exists and that they comply with the relevant policies of the Local Plan.</p> <p>The following sites have been promoted as acceptable for development:</p> <ul style="list-style-type: none"> • 5F1003 31/33 Barkham Ride 70 Units (net) • 5F 1004 Green Acres Farm, Nine Mile Ride 100 Units • 5F1014 Land rear of 6-8 The Village 2 Units • 5F1016 Broughton Farm, Heath Ride 2 Units • 5F1028 Westwood Cottage, Sheerlands Road 10 Units <p>Two of these sites (5F1016 and 5F1014) totalling four net new dwellings constitute new allocations within the Neighbourhood Plan that are not already made in the Local Plan.</p> <p>The policy also details the SANG requirements for all net new housing development.</p>	<p>Potential likely significant effects</p> <p>5 sites have been proposed as acceptable for development. If these sites were allocated there would be a net increase of 184 new dwellings.</p> <p>This is a net increase in dwellings and will need to be discussed further within the body of the report.</p>
ADH2 - Development within Development Limits	<p>This policy allocated the locations of 1,830 new dwellings allocated in the Wokingham borough local plan update.</p>	<p>No likely significant effect.</p>

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
	<p>New development proposals must be contained within the Development Locations.</p> <p>Development within the Finchwood Park area of the Arborfield Strategic Development Location will be encouraged.</p>	<p>The housing allocated under this policy has already been reviewed under the Wokingham borough local plan update HRA and therefore will have no further impacts.</p>
ADH3 - Green Space and Landscaping	<p>For any major applications as defined by Borough-wide policies, a landscape strategy shall be submitted which will incorporate the following details:</p> <ul style="list-style-type: none"> • Existing and proposed hard and soft landscaping • A Condition Survey of all existing trees and hedgerows • An outline of the measures to be taken to protect existing trees and hedgerows during construction. • A Survey of local Public Rights of Way (PROWs) and outline of measures to protect and enhance off road linkages for recreational and active travel purposes available to all nonmotorised users. 	<p>No likely significant effects.</p> <p>The policy is a development management policy and does not have any linking impact pathways.</p>
ADH4 - Independent Living, Care and Vulnerable Housing	<p>This policy describes how proposals providing housing for older residents for care homes and vulnerable communities will be supported.</p>	<p>No likely significant effects.</p> <p>The policy is a development management policy and does not have any linking impact pathways.</p>
ADH5 – Affordable housing	<p>This policy states all proposals for new housing must contain a proportion of affordable housing.</p>	<p>No likely significant effects.</p> <p>The policy is a development management policy and does not have any linking impact pathways.</p>
ADH6 - Provisions for Gypsy and Traveller Communities	<p>This policy relates to the supporting of existing lawful Gypsy and Traveller sites in their current use and potential for their expansion.</p>	<p>No likely significant effects.</p> <p>The policy is a development management policy and does not have any linking impact pathways.</p>
ADH7 - Caravan and Mobile Home Sites	<p>This policy relates to maintaining the current (January 2020) number of caravan and mobile home sites.</p>	<p>No likely significant effects.</p> <p>The policy is a development management policy and does not have any linking impact pathways.</p>
D1 – Building Heights	<p>This policy relates to the permitted height of most developments.</p>	<p>No likely significant effects.</p> <p>The policy is a design policy and does not have any linking impact pathways.</p>

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
D2 - Preserving the rural character of the parish	This policy details the requirement to maintain the separation of settlements and to complement the relevant landscape characteristics by including features such as street trees and retaining the proportion, scale and the space between the main residential buildings on each residential plot.	No likely significant effects. The policy is a design policy and does not have any linking impact pathways.
D3 - Infill, Small Plot Development and Development of Private Residential Gardens	This policy relates to permitted development on small plots and private residential gardens.	No likely significant effects. The policy is a design policy and does not have any linking impact pathways.
GS1 - Key Local Gaps, Green Wedges and other important areas to maintain the separation of settlements	This policy details areas where development proposals would be accepted provided they do not compromise the function of the gap or wedge.	No likely significant effects. The policy is a development management policy and does not have any linking impact pathways.
IRS1 - Protection and enhancement of Local Green Spaces	This policy seeks to protect existing local green spaces and states the need to retain and respect the value placed upon the spaces where possible.	No likely significant effects. The policy is a development management policy and does not have any linking impact pathways.
IRS2 - Protection of Outstanding Views	This policy relates to the requirement for any new developments to prove they will cause no adverse impact on the landscape setting and the outstanding views.	No likely significant effects. The policy is a development management policy and does not have any linking impact pathways.
IRS3 - Conservation and enhancement of the historic character of the area	This policy details protection given to the historic environment and any designated heritage assets in the Parish and their settings.	No likely significant effects. The policy is a development management policy and does not have any linking impact pathways.
IRS4 - Implement strategy to preserve the identity of Finchampstead Parish through informal green spaces	This policy relates to the need to add features to reserve the semi-rural look and feel of the Parish with its surrounding natural open environment in order to be supported.	No likely significant effects. The policy is a development management policy and does not have any linking impact pathways.
IRS5 - Ecologically important areas and Biodiversity	This policy details the need for development proposals to protect and enhance biodiversity area.	No likely significant effects. The policy is a development management policy and does not have any linking impact pathways.
IRS6 - Trees	This policy relates to the retention or removal of trees during development.	No likely significant effects.

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
		The policy is a development management policy and does not have any linking impact pathways.
GA1 - Improve environment and health from traffic pollution	This policy details the need for new developments to consider traffic flows and road use as well as showing effective planning to mitigate noise and air pollution from traffic.	No likely significant effects. The policy is a development management policy and does not have any linking impact pathways.
GA2 - Reduction in car usage with safe personal mobility options	This policy details need to develop transport links for non-car transport.	No likely significant effects. The policy is a development management policy and does not have any linking impact pathways.
TC1 - Supporting Business	This policy detail the types of business proposals that will be supported.	No likely significant effects. The policy is a development management policy and does not have any linking impact pathways.
TC2 - Supporting Business	This policy details support for the planned extension of Hogwood industrial estate as defined in the Wokingham Borough Council Local Plan Update.	No likely significant effects. The policy is a development management policy and does not have any linking impact pathways.
TC3 - Retail Development - California Crossroads	This policy details support for developments that will enhance the role and function at the California Crossroads local centre.	No likely significant effects. The policy is a development management policy and does not have any linking impact pathways..
TC4 - Retail Development - Finchwood Park	This policy supports retail use development within the Finchwood park neighbourhood centre.	No likely significant effects. The policy is a development management policy and does not have any linking impact pathways.
TC5 - Protection of Retail Facilities	This policy details how proposals that provide for the retention of retail premises will be supported.	No likely significant effects. The policy is a development management policy and does not have any linking impact pathways.

