



Aldershot and Farnborough (Rushmoor Borough) Local Plan

Habitats Regulations Assessment Pre-Screening Report

June 2026

Contents

1.	Introduction	3
1.1	Background	3
1.2	New Local Plan	3
1.3	Requirement for HRA	4
1.4	Purpose and Scope of this Report.....	5
2.	Legislative Context and Report Purpose	6
2.1	Rushmoor Borough Council Local Plan Process.....	6
2.2	Purpose and Scope of this Report.....	6
2.3	Legislative Context and HRA Process.....	6
2.4	HRA Methodology	7
3.	Habitats Sites Relevant to this HRA.....	9
3.1	Thames Basin Heaths Special Protection Area (SPA)	12
	Site Description	12
	Designated Conservation Objectives	12
	Environmental Concerns	13
3.2	Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC)	14
	Site Description	14
	Designated Conservation Objectives	14
	Environmental Concerns	15
3.3	Thursley, Hankley and Frensham Commons (Wealden Heaths Phase I) Special Protection Area (SPA)	17
	Site Description	17
	Designated Conservation Objectives	17
	Environmental Concerns	18
3.4	Thursley and Ockley Bog Ramsar Site	18
	Site Description	18
	Designated Conservation Objectives	19
	Environmental Concerns	19
4.	Relevant Plans and Strategies.....	20
4.1	Local Land Use Plans and Strategies	20
4.2	Identifying Other Relevant Plans and Projects	22
4.3	The Thames Basin Heaths SPA Delivery Framework	27
	Impact Pathway	28
	Scale of In-Combination Growth	29
	Mitigation Framework and Cross-Boundary Dependencies	29
	Constraints and Mitigation Capacity	30

Assessment of In-Combination Effects	30
4.4 Annual Housing Requirements	30
5. Pathways of Impact	32
5.1 Introduction.....	32
5.2 Urbanisation.....	32
5.3 Recreational Pressure.....	33
5.4 Atmospheric Pollution	36
5.5 Water Abstraction.....	39
5.6 Water Quality	40
6. Summary	43

1. Introduction

1.1 Background

- 1.1.1 Rushmoor Borough Council is currently in the process of preparing a new local plan (hereafter referred to as the ‘Local Plan’). As part of this process, a habitats regulations assessment (HRA) of the Plan is being undertaken. The objective of this assessment is to identify any aspects of the Plan that would cause a likely significant effect or adverse effect on the integrity of any habitats sites (also known as European sites), Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and, as a matter of government policy, Ramsar sites, either in isolation or in combination with other plans and projects, and to advise on appropriate policy mechanisms for delivering mitigation where such effects were identified. While the HRA will consider all habitats sites to which a connecting impact pathway is identified (as did the HRA for the adopted Local Plan), this pre-screening report is focussed on habitats sites wholly or partly within Rushmoor.
- 1.1.2 For the HRA of the adopted Local Plan (2019), a considerable amount of background information about the vulnerabilities of the habitats sites in Rushmoor was obtained, and these data were the basis of the assessments in the HRA. This first informal stage of the HRA for the new Local Plan is intended to present background information regarding the habitats sites within the borough of Rushmoor and to identify key plans and projects that may of relevance to the screening phase of the HRA.

1.2 New Local Plan

- 1.2.1 Rushmoor Borough Council, as the local planning authority, is responsible for preparing the Local Plan. The current Local Plan, adopted in February 2019, covers the period to 2032 and provides the framework for managing development and determining planning applications.
- 1.2.2 A new local plan is being prepared to cover a 15-year period beyond adoption across the borough. It will address the full range of matters required of a district authority in accordance with the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG), alongside any relevant legislative changes. The Plan will set out strategic policies for housing, employment, retail, leisure, infrastructure, community facilities and environmental protection. Waste and minerals planning will remain a county council responsibility.

1.3 Requirement for HRA

- 1.3.1 The requirement to undertake a habitats regulations assessment (HRA) of development plans was established through amendments to the Habitats Regulations for England and Wales in 2007. The current applicable legislation is the Conservation of Habitats and Species Regulations 2017 (as amended) (the ‘Habitats Regulations’). In preparing its development plan, Rushmoor Borough Council is therefore legally required to carry out an HRA.
- 1.3.2 The Council will generally only progress a plan where it can be demonstrated that it will not adversely affect the integrity of any habitats site (as defined below). The requirement to comply with the Habitats Regulations in plan-making is also reflected in the government’s Planning Practice Guidance (PPG).
- 1.3.3 An HRA assesses the potential effects of a development plan on sites afforded the highest level of protection in the UK, namely Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). These sites were originally designated under European Union (EU) legislation but since 1 January 2021 are protected under domestic legislation through the Habitats Regulations 2017 (as amended). While the EU Directives from which the Regulations derive are no longer binding, the Regulations continue to refer to the habitats and species listed in the annexes to those Directives:
- **SACs** are designated for specific habitat types (listed in Annex I of the Habitats Directive) and species (Annex II).
 - **SPAs** are classified for rare and vulnerable bird species (Annex I of the Birds Directive), as well as regularly occurring migratory species not listed in Annex I.
- 1.3.4 Historically, the term ‘European sites’ was used to describe Natura 2000 sites (SACs and SPAs) and Ramsar sites (designated under the Ramsar Convention). However, following the UK’s exit from the EU, government policy clarifies that references to Natura 2000 in the Regulations and guidance now relate to the ‘national site network’. This comprises:
- Existing SACs and SPAs; and
 - Any new SACs and SPAs designated under the Regulations.
- 1.3.5 Ramsar sites (wetlands of international importance) do not form part of the national site network. Nonetheless, many Ramsar sites overlap with SACs and SPAs and may be designated for similar or different features. Government guidance makes clear that HRA should also be applied to:
- Proposed SACs and potential SPAs;

- Ramsar sites (both listed and proposed); and
- Sites identified as compensatory measures for adverse effects on habitats sites.

1.3.6 Furthermore, the National Planning Policy Framework (NPPF) and accompanying guidance require competent authorities to treat Ramsar sites in the same manner as SACs and SPAs for the purposes of assessment. By contrast, the statutory requirement for HRA does not extend to other nationally designated sites, such as Sites of Special Scientific Interest (SSSIs) or National Nature Reserves (NNRs).

1.3.7 Where a plan is not directly connected with, or necessary for, the conservation management of a habitats site, the competent authority must undertake an HRA. Accordingly, an HRA will be carried out for the Aldershot and Farnborough (Rushmoor Borough) Local Plan in accordance with the Habitats Regulations.

1.3.8 The purpose of the HRA is to identify any elements of the Local Plan that could give rise to adverse effects on the integrity of habitats sites, either alone or in combination with other plans and projects. Where potential effects are identified, the HRA process seeks to develop appropriate avoidance and mitigation measures to ensure that the Plan can be implemented without harm to the designated features of these internationally important sites.

1.4 Purpose and Scope of this Report

1.4.1 This report constitutes the pre-screening baseline stage of the Habitat Regulations Assessment (HRA). It represents the initial phase in determining whether a proposed local plan is likely to result in likely significant effects (LSE) on habitats sites. The report establishes the environmental baseline and context prior to the commencement of formal policy screening.

1.4.2 The purpose of this report is to:

- Identify habitats sites that may be affected by the new Local Plan, including relevant information on their key characteristics, threats and vulnerabilities, existing pressures, and any interdependencies between species and habitats; and
- Define the scope of the HRA Screening Assessment, as well as any subsequent appropriate assessment, where required.

2. Legislative Context and Report Purpose

2.1 Rushmoor Borough Council Local Plan Process

- 2.1.1 Rushmoor Borough Council is the local planning authority for Rushmoor Borough and is responsible for producing the Local Plan. The existing Local Plan was adopted in February 2019 and covers the period up to 2032. The Plan guides the location, scale and type of future development in Rushmoor Borough up to 2032 and provides detailed development management policies to be used in determining planning applications.

2.2 Purpose and Scope of this Report

- 2.2.1 An HRA will be undertaken of the new Local Plan in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended), known as the Habitats Regulations. When a plan is not directly connected with, or necessary for, the conservation management of a habitats site, a competent authority is required to carry out an assessment under the Habitats Regulations, known as a habitats regulations assessment (HRA).
- 2.2.2 The purpose of an HRA is to identify any areas of a local plan that have the potential to cause an adverse effect on the designated features of a Natura 2000 or European site (habitats sites), either in isolation or in combination with other plans and projects, and to devise appropriate strategies to avoid or mitigate for any such effects which may be identified.
- 2.2.3 The purpose of this report is therefore to enable the developing Local Plan to fully have regard to the statutory obligations of the Habitats Regulations to identify potential adverse effects at the earliest stages through application of a ‘source-pathway-receptor’ model. In addition, key constraints and opportunities at habitats sites and likely pathways of impact from the Local Plan are set out. Key issues for consideration are identified. Subsequent iterations of this HRA will be undertaken as the Local Plan develops and quantified evidence becomes available to ensure that any adverse effects identified can be avoided or mitigated in line with the planning mitigation hierarchy.

2.3 Legislative Context and HRA Process

- 2.3.1 The HRA process assesses the potential effects of a plan or project on the conservation objectives of sites designated under the Habitats and Birds Directives. These sites form a system of internationally important sites throughout Europe known collectively as the ‘Natura 2000 Network’. In line with the Habitats Regulations, UK sites which were part of the Natura 2000 Network before leaving

the EU have become part of the National Site Network. The Habitats Regulations apply the precautionary principle to protected areas. Plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the site(s) in question. Plans and projects may still be permitted if there are no alternatives to them and there are imperative reasons of overriding public interest (IROPI) as to why they should go ahead. In such cases, compensation would be necessary to ensure the overall integrity of the site network.

2.3.2 The Habitats Regulations provide a definition of a 'European site' at Regulation 8. These include Special Areas of Conservation (SAC), Sites of Community Importance, Special Protection Areas (SPA) and sites proposed to the European Commission in accordance with Article 4(1) of the Habitats Directive.

2.3.3 In addition, policy in England and Wales notes that the following sites should also be given the same level of protection as a European site. European sites, together with sites set out in national policy (listed below), are referred to in England and Wales as a habitats site.

- A potential SPA (pSPA);
- A possible/proposed SAC (pSAC);
- Listed and proposed Ramsar sites (Wetland of International Importance under the Ramsar Convention); and
- In England, sites identified or required as compensation measures for adverse effects on statutory European sites, pSPA, pSAC, and listed or proposed Ramsar sites.

2.3.4 A competent authority, in exercising any of its functions, must have regard to the requirements of the Habitats Regulations so far as they may be affected by the exercise of those functions. Rushmoor Borough Council is the competent authority for the delivery of a local plan and therefore has responsibility for ensuring that the provisions of the Habitats Regulations are appropriately considered within the Local Plan.

2.3.5 Regulation 63 of the Habitats Regulations notes that before deciding to undertake or give any consent, permission or other authorisation for a plan or project, a competent authority must make an appropriate assessment of the implications of the plan or project for that site in view of its site conservation objectives. These tests are referred to collectively as a habitats regulations assessment (HRA).

2.4 HRA Methodology

2.4.1 Accepted best practice guidance identifies the following four-stage broad methodology for undertaking an HRA:

- **Stage 1: Screening**

Screening to determine if the Local Plan would be likely to have a significant effect on the conservation objectives of a habitats site, either alone or in combination with other plans or projects. This stage comprises the identification of potential effects associated with the Local Plan on habitats sites and an assessment of the likely significance of these effects.

- **Stage 2: Appropriate Assessment and the ‘Integrity Test’**

If a ‘likely significant effect’ is identified at Stage 1, an appropriate assessment is required. An appropriate assessment must ascertain whether or not the Local Plan would have an adverse effect on the integrity of any habitats site. This stage comprises an impact assessment and evaluation in view of a habitats site’s conservation objectives. Where adverse impacts on site integrity are identified, consideration is given to potential mitigation measures to avoid any identified adverse effect.

- **Stage 3: Alternative Solutions**

Deciding whether there are alternative solutions which would avoid or effectively mitigate any adverse effect on a habitats site.

- **Stage 4: Imperative Reasons of Overriding Public Interest and Compensatory Measures**

Considering imperative reasons of overriding public interest and securing compensatory measures.

- 2.4.2 This report sets out pre-screening checks for likely significant effects, either alone or in combination with other plans or projects. The report informs the emerging Local Plan to avoid or reduce any likely significant effects identified. Issues of relevance and consideration are then taken forward for detailed Stage 1 screening as Local Plan evidence begins to take shape.

3. Habitats Sites Relevant to this HRA

- 3.1 Relevant source legislation does not prescribe a geographical zone of influence for an HRA with regard to land use plans. Whether a habitats site should be scoped in or out of a plan assessment is best assessed on a case-by-case basis following an established ‘source-pathway-receptor’ model of impact evaluation.
- 3.2 Government guidance recommends that a zone of influence approach is necessary when applying an HRA to a land use plan and that a specific decision-making threshold does not apply.¹ The guidance is clear that only European habitats sites within the zone of influence should be included within the scope of the HRA work to be completed.
- 3.3 Potential impacts with a broad range of potential sources and pathways should be assessed at a broader and, therefore, more precautionary zone of influence. Aerial emissions from traffic is one such potential impact source and is therefore an appropriate proxy for establishing a suitably precautionary zone of influence for this HRA pre-screening report. The guidance referenced above recommends that a land use plan HRA should assess potential effects of traffic emissions on European habitats sites located within 10 km of the land use plan boundary.
- 3.4 The geographical scope of this report therefore includes:
- All sites within the borough boundary; and
 - All other relevant habitats sites (as set out in paragraph 2.3.3 above) within 10 km of the Local Plan boundary.
- 3.5 The Thames Basin Heaths Special Protection SPA is the only habitats site present within the borough of Rushmoor. This SPA is made up of many component Sites of Special Scientific Interest (SSSI) spread across numerous local authorities (as shown in Figure 1 below). Table 1 below lists all habitats sites both within Rushmoor Borough and within 10 km of the Local Plan boundary. Figure 1 shows the location of these habitats sites in relation to Rushmoor Borough.

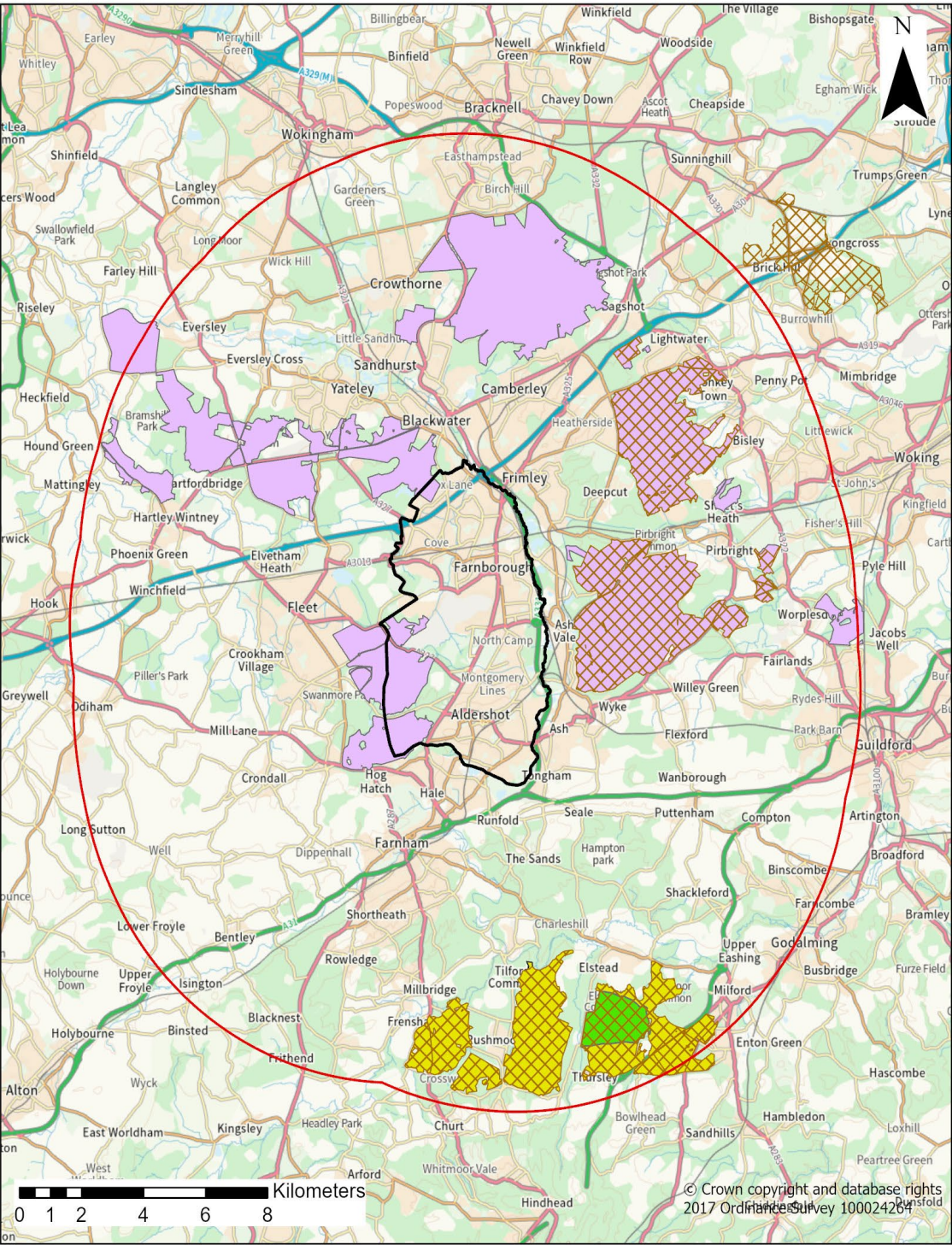
Table 1: Habitats Sites Located within 10 km of the Local Plan Boundary and Therefore Considered in this Habitats Regulations Assessment

Habitats Site	Minimum Distance from Rushmoor Borough Boundary
Thames Basin Heaths Special Protection Area (SPA)	Within the borough

¹ Chapman, C. and Kite, B. (2021) ‘Guidance on Decision-Making Thresholds for Air Pollution’. JNCC Report No. 696 (Main Report), JNCC, Peterborough, ISSN 0963-8091.

Habitats Site	Minimum Distance from Rushmoor Borough Boundary
Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC)	0.9km
Thursley, Hankley and Frensham Commons (Wealden Heaths Phase I) SPA	5.2km
Thursley and Ockley Bogs Ramsar site	5.2km

Figure 1: Location of Habitats Sites Present within the 10 km Zone of Influence and Therefore Considered in this Habitats Regulations Assessment



Legend

- Rushmoor Boundary
- Thursley and Ockley Bogs Ramsar site
- Thames Basin Heaths Special Protection Area (SPA)
- Thursley, Hankley and Frensham Commons (Wealden Heaths Phase I) SPA
- Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC)
- 10 Km Buffer

3.1 Thames Basin Heaths Special Protection Area (SPA)

Site Description

- 3.1.1 The Thames Basin Heaths Special Protection Area (SPA) covers an area of 8,311 hectares and consists of a number of fragments of lowland heathland scattered across Surrey, Hampshire and Berkshire. It is predominantly dry and wet heath but also includes areas of deciduous woodland, gorse scrub, acid grassland and mire, as well as associated conifer plantations.
- 3.1.2 Around 75% of the SPA has open public access, being either common land or designated as open country under the Countryside and Rights of Way Act 2000.
- 3.1.3 The SPA supports significant populations of three important bird species and consists of 13 Sites of Special Scientific Interest (SSSI). Three of the SSSIs are also designated as part of the Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC). Eelmoor Marsh SSSI, part of Bourley and Long Valley SSSI and part of Castle Bottom to Yateley and Hawley Commons SSSI, lies within Rushmoor Borough. An additional site, Ash to Brookwood SSSI, lies outside, but close to, the Rushmoor boundary.
- 3.1.4 The Thames Basin Heaths SPA overlaps with the Thursley, Ash, Pirbright and Chobham SAC.

Designated Conservation Objectives

- 3.1.5 The conservation objectives for the Thames Basin Heaths SPA is to maintain or restore:
- 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.
- 3.1.6 The Thames Basin Heaths SPA qualifies under Article 4.1 of the Birds Directive (79/409/EEC). The qualifying features are the breeding populations of three ground-nesting bird species listed on Annex I of the Directive, whose populations are of European importance:
- Nightjar (*Caprimulgus europaeus*): 7.8% of the breeding population in Great Britain (count mean 1998-1999);
 - Woodlark (*Lullula arborea*): 9.9% of the breeding population in Great Britain (count as at 1997); and

- Dartford warbler (*Sylvia undata*): 27.8% of the breeding population in Great Britain (count as at 1999).

Habitats Supporting these Bird Species

3.1.7 Open heathland habitats on sandy or peaty acidic soils, supporting dry heathy vegetation on well-drained slopes, wet heath on low-lying shallow slopes and bogs in valleys. The site consists of tracts of heathland, scrub and woodland. Less open habitats of scrub, acidic woodland and conifer plantations dominate, within which are scattered areas of open heath and mire. The qualifying bird species make use of habitat mosaics nesting on the ground, often at the woodland/heathland edge and in gorse scrub. Scattered trees and scrub are used for roosting. The Thames Basin Heaths form part of a complex of heathlands in southern England that support important breeding bird populations.

Environmental Concerns

3.1.8 The key environmental concerns affecting delivery of the site's conservation objectives, as relevant to this Local Plan HRA, have been defined by Natural England as:²

- Population abundance: maintain the size of the breeding population of all three qualifying bird species.
- Disturbance caused by human activity: restrict and reduce the frequency, duration and/or intensity of disturbance.
- Extent and distribution of supporting habitat for the breeding season: maintain the extent, distribution and availability of suitable breeding habitat, supporting all necessary stages of the birds' breeding cycle (courtship, nesting, feeding and roosting).
- Air quality: restore, as necessary, the concentrations and deposition of air pollutants to at or below the site-relevant Critical Load or Level values.
- Connectivity with supporting habitats: maintain or restore the safe passage of birds moving between nesting and feeding areas.

² 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', dated 9 May 2016, <https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK9012141.pdf>.

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

Site Description

- 3.2.1 Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC) is a large and varied site consisting of four Sites of Special Scientific Interest (SSSI), three of which also form part of the Thames Basin Heaths SPA, with the fourth forming Thursley, Hankley and Frensham Commons (Wealden Heaths Phase I) SPA. Ash to Brookwood Heaths SSSI and the southern part of Colony Bog and Bagshot Heath SSSI lie within Guildford Borough. Habitats on site form an extensive complex of heaths, with extensive areas of wet and dry heath, acid mire and bog pools. Underlying geology comprises free-draining sandstones with occasional 'lenses' of clay which impede drainage, resulting in localised surface wetness and seepages. It is this impeded drainage which gives rise to the formation of the mire systems.
- 3.2.2 The complex includes outstanding examples of valley mire vegetation which supports very rich assemblages of wetland invertebrates, bryophytes and scarce plants, as well as providing a habitat for breeding birds. This SAC also supports the three rare qualifying bird species of the Thames Basin Heaths SPA.
- 3.2.3 The SAC overlaps with the Thames Basin Heaths SPA and the Thursley, Hankley and Frensham Commons (Wealden Heaths Phase I) SPA and includes the Thursley and Ockley Bog Ramsar site.

Designated Conservation Objectives

- 3.2.4 This SAC has been designated for the following qualifying habitat features:
- North Atlantic wet with cross-leaved heath;
 - European dry heaths; and
 - Depressions on peat substrates of the Rhynchosporion.

North Atlantic Wet Heaths

- 3.2.5 Wet heath is an important habitat for a range of vascular plant and bryophyte species of an oceanic or Atlantic distribution in Europe, several of which have an important part of their EU and world distribution in the UK. The wet heath at this SAC 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 (*Leucorhinia dubia*).

European Dry Heaths

- 3.2.6 European dry heaths typically occur on freely draining, acidic to circumneutral soils with generally low nutrient content. Ericaceous dwarf-shrubs dominate the vegetation. The most common is heather (*Calluna vulgaris*), which often occurs in combination with gorse (*Ulex* spp.), bilberry (*Vaccinium* spp.) or bell heather (*Erica cinerea*), though other dwarf shrubs are important locally. Nearly all dry heath is semi-natural, being derived from woodland through a long history of grazing and burning. Most dry heaths are managed as extensive grazing for livestock or, in upland areas, as grouse moors.
- 3.2.7 Dry heaths are localised in lowland areas, especially in south and central England, where they have declined in extent due to afforestation, agricultural improvement and other impacts.

Depressions on Peat Substrates of the Rhynchosporion

- 3.2.8 Depressions on peat substrates of the Rhynchosporion occur in complex mosaics, with lowland wet heath and valley mire vegetation, in transition mires, and on the margins of bog pools and hollows in both raised and blanket bogs. The vegetation is typically very open, usually characterised by an abundance of white beak-sedge (*Rhynchospora alba*), often with well-developed algal mats, the bog moss (*Sphagnum denticulatum*), round-leaved sundew (*Drosera rotundifolia*) and, in relatively base-rich sites, brown mosses such as *Drepanocladus revolvens* and *Scorpidium scorpioides*. The nationally scarce species brown beak-sedge (*Rhynchospora fusca*) and marsh clubmoss (*Lycopodiella inundata*) also occur in this habitat.
- 3.2.9 Depressions on peat substrates of the Rhynchosporion is a rare habitat type in the UK that exhibits a narrow range of ecological variation and has a restricted geographical distribution. This habitat type has a very discontinuous distribution, being found in largest quantity on heaths in southern England and on blanket and raised bogs in western Britain.

Environmental Concerns

- 3.2.10 The key environmental concerns affecting delivery of the site's conservation objectives, as relevant to this Local Plan HRA, have been defined by Natural England as:³

³ 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', dated 29 February 2016, <https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0012793.pdf>.

- Extent of qualifying habitat features within the site: maintain the total extent of qualifying features to the baseline extent set by Natural England's Supplementary Advice note.
- Spatial distribution of qualifying features within the site: maintain (or restore where habitats are degraded) the distribution and configuration of all qualifying features, including, where applicable, its component vegetation types.
- Adaptation and resilience: maintain or restore the site's qualifying habitat feature's ability, and that of its supporting processes, to adapt or evolve to wider environmental change, either within or external to the site.
- Functional connectivity with wider landscape: maintain (or restore where habitats are fragmented or isolated) the overall extent, quality and function of any supporting features within the local landscape which provide a critical functional connection with the site.
- Key structural, influential and site distinctive species: maintain (or restore where habitats are degraded) the abundance of the 'typical' species listed by Natural England's Supplementary Advice note to enable each of them to be a viable component of the relevant qualifying habitat.
- Vegetation (undesirable species): maintain (or restore where habitats are degraded) the frequency/cover of undesirable species to within acceptable levels and prevent changes in surface condition, soils, nutrient levels or hydrology which may encourage their spread.
- Air quality: restore, as necessary, the concentrations and deposition of air pollutants to at or below the site-relevant Critical Load or Level values.
- Hydrology: at a site unit and/or catchment level, as necessary, maintain or restore the natural hydrological regime to provide the conditions necessary to sustain relevant qualifying features.
- Water quality: where the qualifying feature is dependent on surface water and/or groundwater, maintain or restore water quality and quantity to a standard which provides the necessary conditions to support the feature (i.e., permanently high water table, very low nutrient status, low base status and low pH).
- Water chemistry: maintain (or restore where habitats are suffering from changes in water flow or chemistry) the surface water and groundwater supporting the hydrology of the bog at a low nutrient status and within natural variation of pH levels.

3.3 Thursley, Hankley and Frensham Commons (Wealden Heaths Phase I) Special Protection Area (SPA)

Site Description

- 3.3.1 The Thursley, Hankley and Frensham Commons SPA forms a 1,880 ha complex of lowland heaths. The underlying geology of the commons is predominantly made up by sandstones and ironstone that give rise to mostly free-draining sandy soils, but layers of less-permeable deposits give rise locally to wetlands, including mires, flushes and wet woodlands.
- 3.3.2 Part of the site, Thursley Common, is declared as a National Nature Reserve managed by Natural England. The SPA boundary overlaps with the Thursley and Ockley Bogs Ramsar site and coincides with part of the Thursley, Ash, Pirbright and Chobham SAC.

Designated Conservation Objectives

- 3.3.3 The conservation objectives for the Thursley, Hankley and Frensham Commons (Wealden Heaths Phase I) SPA is to maintain or restore:
- 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.
- 3.3.4 The Thursley, Hankley and Frensham Commons (Wealden Heaths Phase I) SPA qualifies under Article 4.1 of the Birds Directive (79/409/EEC). The qualifying features are the breeding populations of three ground-nesting bird species listed on Annex I of the Directive, whose populations are of European importance:
- Nightjar (*Caprimulgus europaeus*): 1% of the breeding population in Great Britain (count as in 1984);
 - Woodlark (*Lullula arborea*): 12% of the breeding population in Great Britain (count as in 1984); and
 - Dartford warbler (*Sylvia undata*): 4% of the breeding population in Great Britain (count as in 1984).
- 3.3.5 Habitats supporting these bird species are very similar to those found at the Thames Basin Heaths SPA, referenced above.

Environmental Concerns

3.3.6 The key environmental concerns affecting delivery of the site's conservation objectives, as relevant to this Local Plan HRA, have been defined by Natural England as:⁴

- Population abundance: maintain the size of the breeding population of all three qualifying bird species.
- Disturbance caused by human activity: restrict and reduce the frequency, duration and/or intensity of disturbance.
- Extent and distribution of supporting habitat for the breeding season: maintain the extent, distribution and availability of suitable breeding habitat, supporting all necessary stages of the birds' breeding cycle (courtship, nesting, feeding and roosting).
- Air quality: restore, as necessary, the concentrations and deposition of air pollutants to at or below the site-relevant Critical Load or Level values.
- Connectivity with supporting habitats: maintain or restore the safe passage of birds moving between nesting and feeding areas.

3.4 Thursley and Ockley Bog Ramsar Site

Site Description

3.4.1 Thursley and Ockley Bogs is a valley-mire complex dominated by bog-moss (*Sphagnum* spp.) surrounded by wet heath and lies within Thursley, Hankley and Frensham Commons SSSI. The site is acidic and nutrient poor. The mire occurs within a matrix of heathland, where drainage is impeded, and a deep layer of peat has built up from the remains of bog-moss (*Sphagnum* spp.) which forms much of the vegetation. Several areas of open water also contribute significantly to the overall diversity of the site, ranging from acidic boggy pools and ditches to large ponds.

3.4.2 The site supports assemblages of rare wetland invertebrate species, including notable numbers of breeding dragonflies. A significant number of non-wetland British Red Data Book invertebrates also occur on Thursley and Ockley Bogs. All six native reptile species and nationally important breeding populations of European nightjar and woodlark are also present on site.

⁴ Natural England (2017) 'European Site Conservation Objectives: Supplementary Advice on Conserving and Restoring Site Features: Thursley, Hankley and Frensham Commons Special Protection Area (SPA), Site Code: UK9012131', dated 6 January 2017, <https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK9012131.pdf>.

Designated Conservation Objectives

- 3.4.3 This site is designated because it meets Ramsar criterion 2 ('supports a community of rare wetland invertebrate species, including notable numbers of breeding dragonflies') and Ramsar criterion 3 ('it is one of few sites in Britain to support all six native reptile species'). The site also supports nationally important breeding populations of European nightjar (*Caprimulgus europaeus*) and woodlark (*Lullula arborea*).
- 3.4.4 Natural England identifies that the Ramsar designation is legally underpinned by the Thursley, Hankley and Frensham Commons Site of Special Scientific Interest (SSSI) selection criteria. In addition, Natural England summarises faunal reasons for Ramsar designation as:
- Native reptile assemblage;
 - Nightjar (*Caprimulgus europaeus*): breeding;
 - Wetland invertebrate assemblage; and
 - Woodlark (*Lullula arborea*): breeding.

Environmental Concerns

- 3.4.5 Thursley, Hankley and Frensham Commons SSSI can be used as a proxy for the protection of the Ramsar site. Natural England notes that the key environmental concerns for this SSSI, as relevant to this Local Plan HRA, include recreational pressure and maintaining appropriate land management.
- 3.4.6 The key environmental concerns referenced for the Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC) above are also relevant for the Ramsar designation.

4. Relevant Plans and Strategies

4.1 Local Land Use Plans and Strategies

Table 2: Summary of Local Strategies that the Council Will Have Regard to within its HRA Process

Plan, Policy or Programme	Relevant Information/Policy Text
Rushmoor Surface Water Management Plan (2013), superseded by Catchment Management Plans (CMPs) in 2022 ⁵	Steer development away from parts of the borough at risk of surface water flooding.
Rushmoor Air Quality Annual Status Report (2024) ⁶	Address sources of poor air quality and encourage greener forms of transport.
The Water Cycle Study (WCS) for Rushmoor forms part of the evidence base supporting the Rushmoor Local Plan (adopted 21 February 2019) ⁷	It was prepared jointly with Hart District Council and Surrey Heath Borough Council, reflecting shared water infrastructure and catchments. Growth can be accommodated, but only if: • Infrastructure improvements are made; and • Water efficiency and SuDS are implemented. Careful management is needed to avoid impacts on rivers and flooding.

⁵ <https://www.hants.gov.uk/landplanningandenvironment/environment/flooding/strategies/catchment-management-plans>

⁶ <https://www.rushmoor.gov.uk/media/eqtfr2qw/air-quality-status-report-2024-accessible.pdf>

⁷ <https://www.rushmoor.gov.uk/planning-and-building-control/planning-policies/the-rushmoor-local-plan/evidence-supporting-the-rushmoor-local-plan/evidence-on-the-environment/>

Plan, Policy or Programme	Relevant Information/Policy Text
Thames Basin Heaths Special Protection Area Avoidance and Mitigation Strategy	The Thames Basin Heaths Special Protection Area (TBH SPA) has statutory protection from adverse impact under the Conservation of Habitats and Species Regulations (as amended), protection under Saved Policy NRM6 of the South East Plan and Policy NE1 of the Rushmoor Local Plan. Key elements of the Delivery Framework are: • A presumption against new residential development within 400 m of the Thames Basin Heaths SPA boundary. • Provision of Suitable Alternative Natural Greenspace (SANG) in order to divert additional recreational pressure away from the SPA. • Provision of a range of Strategic Access Management and Monitoring measures (SAMM) to avoid displacing visitors from one part of the SPA to another and to minimise the impact of visitors on the SPA.
Rushmoor Climate Change Strategy and Action Plan 2025-2028 ⁸	Protect the natural environment, taking account of risks from climate change. Foster sustainable practices to support carbon sequestration.
Hampshire Climate Change Strategy and Action Plan 2020-2025 ⁹	Protect the natural environment, taking account of risks from climate change. Foster sustainable practices to support carbon sequestration.
Rushmoor Playing Pitch Strategy 2024-2035 ¹⁰	Promote healthier lifestyles and access to recreational space.

⁸ <https://www.rushmoor.gov.uk/recycling-rubbish-and-environment/climate-change-and-biodiversity/climate-change-in-rushmoor/climate-change-action-plan/>

⁹ <https://www.hants.gov.uk/landplanningandenvironment/environment/climatechange>

¹⁰ <https://democracy.rushmoor.gov.uk/documents/s15608/Adoption%20of%20a%20new%20Playing%20Pitch%20Strategy%20for%20Rushmoor%20-%20Report%20No.%20PG2530.pdf>

Plan, Policy or Programme	Relevant Information/Policy Text
Rushmoor Local Cycling and Walking Infrastructure Plan (2023) ¹¹	Promote core walking zones and a network of cycle routes to reduce reliance on the private car.

4.2 Identifying Other Relevant Plans and Projects

4.2.1 There are other plans and projects that are often relevant to the ‘in combination’ assessment, most notably Thames Water’s Water Resource Management Plan (2015-2040) and the Environment Agency’s River Loddon Catchment Abstraction Management Strategy. These will be taken into account within the Stage 1 screening phase of the Local Plan HRA.

4.2.2 Stage 1 screening will also have regard to:

- Significant development site allocations and planning applications granted by neighbouring authorities which have reasonable potential to contribute to identified impact pathways; and
- Significant planning applications within Rushmoor Borough, both granted and pending determination, which have reasonable potential to contribute to identified impact pathways.

Table 3: Summary of Other Relevant Documents that the Council Will Have Regard to within its HRA Process

Plan, Policy or Programme	Relevant information/Policy Text
Thames River Basin District River Basin Management Plan (2022) ¹²	Protect water quality and flow, including from pollution, physical modification and changes to natural flow (e.g., abstraction), including groundwater.
Loddon East Catchment Management Plan (2021) ¹³	Protect priority areas and mitigate impacts of flooding.

¹¹ <https://www.rushmoor.gov.uk/planning-and-building-control/planning-policies/local-cycling-and-walking-infrastructure-plan/>

¹² <https://www.gov.uk/guidance/thames-river-basin-district-river-basin-management-plan-updated-2022>

¹³ <https://www.hants.gov.uk/landplanningandenvironment/environment/flooding/strategies/catchment-management-plans>

Plan, Policy or Programme	Relevant information/Policy Text
Local Flood and Water Management Strategy (2020) ¹⁴	Protect areas at high risk of flooding.
Loddon Catchment Partnership, 'Loddon Catchment Plan' (2017) ¹⁵	Protect priority areas (much of Aldershot and Farnborough) in partnership with others.
South East River Basin District Flood Risk Management Plan (2021-27) ¹⁶	Steer development away from areas at highest risk of flooding and adjust to climate change.
South East Water, 'Water Resources Management Plan 2020 to 2080' (2019) ¹⁷	Address the balance between the demand and supply of water.
Thames Water, 'Drainage and Wastewater Management Plan 2025-2050' (2022) ¹⁸	Ensure sufficient capacity within the sewerage network for the level of development proposed.
Thames Water, 'Catchment Strategic Plan: A Long-Term Strategic Plan for West Berkshire, Reading, Wokingham, Bracknell Forest, Windsor and Maidenhead, Hampshire and West Sussex' (2023; DWMP28 upcoming in August 2028) ¹⁹	Protect water sources and water quality.

¹⁴ <https://www.hants.gov.uk/landplanningandenvironment/environment/flooding/strategies/local-flood-risk-management-strategy>

¹⁵ <https://www.southeastriverstrust.org/river-loddon/>

¹⁶ <https://www.gov.uk/government/publications/south-east-river-basin-district-flood-risk-management-plan>

¹⁷ <https://www.southeastwater.co.uk/about/resources/publications/wrmp19-wrmp>

¹⁸ <https://www.thameswater.co.uk/about-us/regulation/drainage-and-wastewater-management#csplans>

¹⁹ <https://www.thameswater.co.uk/about-us/regulation/drainage-and-wastewater-management#csplans>

Plan, Policy or Programme	Relevant information/Policy Text
Thames Water, 'Our Catchment Plan: Providing Safe and Reliable Wastewater Services in Aldershot' (2018) ²⁰	Support the implementation of sustainable drainage systems.
Local Plan and Policy Framework Hart Local Plan 2032 (2020): Policy NBE3 ²¹ Requires SANG and SAMM contributions Controls development within SPA zones	Shares housing market area (HMA). Competes for SANG capacity. Cross-border developments (e.g., Farnborough/Fleet edge). Fleet and Church Crookham (urban extensions + windfall growth): major housing growth area in Hart Local Plan 2032. Shares recreation draw towards Yateley/Hawley Commons/Ash ranges.
Surrey Heath Borough Local Plan (2019–2038): emerging/examination ²²	Strongest cumulative impact source. Shared visitor catchments (e.g., Ash/Camberley commons). Competing demand for mitigation sites. Deepcut regeneration area (former MoD land): approx. 1,200-1,500 homes (substantial strategic site), immediately east of Rushmoor boundary (Frimley/Camberley corridor). Major contributor to cumulative recreational pressure. Relies on SANG network, including Chobham/Blackwater Valley corridor. Camberley-Frimley urban intensification. High-density population increase → visitor pressure rather than land take. Strong overlap with Aldershot/Ash SPA access points.

²⁰ <https://www.thameswater.co.uk/about-us/regulation/drainage-plans>

²¹ <https://www.hart.gov.uk/planning-and-building-control/planning-policy/plans-and-policies>

²² <https://www.surreyheath.gov.uk/planning-and-building-control/planning-policy/development-plan/new-local-plan>

Plan, Policy or Programme	Relevant information/Policy Text
Guildford Borough Local Plan 2019–2034 (2019)²³	Larger-scale growth schemes contribute to in-combination effects. Draws on same SPA sub-areas (Ash to Brookwood Heaths). Blackwell Farm (A3 strategic urban extension): approx. 1,800 homes (major allocation). Impact pathway: large population increase → contributes to in-combination pressure. Relies on Guildford-wide SANG network.
Waverley Borough Local Plan Part 1: Strategic Policies and Sites (2018)²⁴ Plan period: to 2032	Farnham lies adjacent to the Rushmoor boundary. Shared recreation patterns and SANG catchments. Limited SANG capacity → cross-boundary pressure. Key sites include Waverley Local Plan strategic housing sites (Farnham area) and Farnham Neighbourhood Plan allocations. Direct competition for: • SANG catchments • Visitor draw away from SPA Risk of cross-boundary displacement of recreation.
Bracknell Forest Local Plan 2020-2037 (2024)²⁵	Significant housing growth within SPA network. Contributes to strategic cumulative impacts. Influences JSP-wide mitigation tariffs and policy evolution. Broadmoor/Warfield/Binfield strategic growth. Multiple large-scale urban extensions. Contributes to SPA-wide visitor pressure. Drives SAMM tariff levels and policy tightening.

²³ <https://www.guildford.gov.uk/guildfordlocalplan>

²⁴ <https://www.waverley.gov.uk/services/planning-and-building/planning-strategies-and-policies/local-plan/existing-local-plan/local-plan-part-one>

²⁵ <https://www.bracknell-forest.gov.uk/planning-and-building-control/planning/planning-policy/development-plan/bracknell-forest-local-plan/about-bracknell-forest-local-plan>

Plan, Policy or Programme	Relevant information/Policy Text
Surrey Local Transport Plan 4 (LTP4) (adopted 12 July 2022)²⁶ Plan period: 2022–2032	Sets a long-term framework for transport improvements and behaviour change to at least 2032 (with vision beyond). Upgrades to key road corridors (e.g., A331 Blackwater Valley route, A3, M3 junctions). Junction capacity enhancements and congestion relief measures. Air Quality Impacts: • Road improvements and growth → increased vehicle movements Effects: • Higher NOx emissions and nitrogen deposition • Degradation of nutrient-poor heathland habitats • Reduced habitat quality for SPA bird species This is particularly relevant along corridors feeding the A331 and M3, which influence air quality affecting SPA units within and near Rushmoor. Main risk from increased accessibility, traffic and growth.
Surrey Minerals Plan Core Strategy and DPDs²⁷ Period: 2011–2026	Provision of sand and gravel extraction sites. Safeguarding of mineral resources. Sand and gravel extraction. Effects: • Loss of functionally linked land • Fragmentation of ecological networks Localised impacts from land take, disturbance and hydrology.

²⁶ <https://www.surreycc.gov.uk/roads-and-transport/policies-plans-consultations/transport-plan>

²⁷ <https://www.surreycc.gov.uk/land-planning-and-development/minerals-and-waste/minerals-core-strategy-development-plan>

Plan, Policy or Programme	Relevant information/Policy Text
Surrey Waste Local Plan (adopted 8 December 2020)²⁸ Plan period: 2019–2033	HGV movements transporting waste. Effects: - Increased emissions across transport corridors - Additional nitrogen deposition on heathlands Impacts primarily from traffic and site operations.
Hampshire Local Transport Plan (LTP4) (adopted in February 2024)²⁹ Plan period: to 2050	Air quality effects. Increased traffic from network improvements and growth. Effects on sites: - Increased NOx emissions - Nitrogen deposition on heathlands - Deterioration of low-nutrient habitats
Hampshire Minerals and Waste Plan (adopted in October 2013)³⁰ Plan period: to 2030 Updated Plan expected to be adopted in July 2026³¹	Mineral extraction (sand and gravel quarries). Allocation of waste sites. Effects: - Loss of functionally linked land - Fragmentation of ecological corridors - Reduction in supporting habitat for SPA bird populations

4.3 The Thames Basin Heaths SPA Delivery Framework

4.3.1 Rushmoor Borough lies within the zone of influence of the Thames Basin Heaths SPA, which extends across multiple local authority areas, and is subject to a strategic approach to impact avoidance and mitigation, reflecting the cross-boundary nature of both the habitat and the impact pathways.

4.3.2 Natural England has advised that residential development within 5 km of the SPA is likely to result in increased recreational pressure, with the most acute effects

²⁸ <https://www.surreycc.gov.uk/land-planning-and-development/minerals-and-waste/waste-plan>

²⁹ <https://www.hants.gov.uk/transport/localtransportplan>

³⁰ <https://www.hants.gov.uk/landplanningandenvironment/minerals-waste-planning/hampshire-minerals-waste-plan>

³¹ <https://www.hants.gov.uk/landplanningandenvironment/minerals-waste-planning/hampshire-minerals-waste-plan/minerals-waste-plan-partial-update-consultation/hmwp-reg25>

arising from development within 400 m of the SPA. As a consequence, all of Rushmoor Borough and a large proportion of neighbouring authorities lie within the SPA's zone of influence.

- 4.3.3 In 2007, Rushmoor Borough Council, along with other local authorities and organisations, helped to create a Joint Strategic Partnership Board (JSPB) to help with joint working and the exchange of information within the Thames Basin Heaths SPA area.
- 4.3.4 In 2009, the JSPB adopted the Thames Basin Heaths Special Protection Area Delivery Framework.³²
- 4.3.5 The Delivery Framework sets out the JSPB's recommendations on impact avoidance and mitigation measures to enable the delivery of dwellings in the vicinity of the SPA without having a significant effect on the SPA as a whole. It focuses on avoiding the impact of recreation and urbanisation on the SPA habitat and interest features.
- 4.3.6 Rushmoor Borough Council has signed up to this Delivery Framework, and it underpins the approach adopted in the Council's Avoidance and Mitigation Strategy. It enables residential development to take place in Rushmoor, which the Special Protection Area legislation would otherwise prevent. The Council considers all residential planning applications against the requirements of the Avoidance and Mitigation Strategy.³³
- 4.3.7 Rushmoor has historically formed part of a wider Housing Market Area (HMA) with Hart and Surrey Heath and is also functionally linked to a broader group of authorities affected by the SPA. These relationships are characterised by significant patterns of commuting, migration and shared access to recreational resources.

Impact Pathway

- 4.3.8 The primary pathway of impact is recreational disturbance associated with population growth, which may adversely affect the integrity of the SPA through:
- Increased visitor numbers (particularly dog walkers);
 - Disturbance to ground-nesting birds; and
 - Changes in behaviour and displacement of qualifying species.
- 4.3.9 Evidence indicates that housing growth across the wider SPA catchment contributes to cumulative increases in visitor pressure, irrespective of

³² <https://www.rushmoor.gov.uk/media/g2xfm2g2/thames-basin-heaths-special-protection-area-delivery-framework-accessible.pdf>

³³ <https://www.rushmoor.gov.uk/spa>.

administrative boundaries. New residents in neighbouring authorities are likely to access SPA land within and around Rushmoor, reflecting established visitor patterns and the permeability of the landscape.³⁴

Scale of In-Combination Growth

4.3.10 The Thames Basin Heaths SPA is influenced by housing growth across eleven local authorities, with substantial planned increases in dwellings within the 5 km zone of influence. This has resulted in a significant cumulative uplift in population, with tens of thousands of homes delivered or planned in proximity to the SPA.³⁵

4.3.11 Within the HMA, there is also evidence of unmet housing need being redistributed between authorities, further reinforcing cross-boundary effects. As a result, growth in neighbouring authorities (including Hart, Surrey Heath and others) contributes directly to the recreational baseline affecting SPA land associated with Rushmoor.

Mitigation Framework and Cross-Boundary Dependencies

4.3.12 To address these in-combination effects, a strategic mitigation framework operates across the SPA catchment, comprising:

- Provision of Suitable Alternative Natural Greenspace (SANG); and
- Strategic Access Management and Monitoring (SAMM).

4.3.13 These measures are applied consistently across affected authorities and are designed to avoid and mitigate the cumulative impacts of housing growth on the SPA.

4.3.14 The effectiveness of this framework relies on joint working and shared infrastructure, including:

- Strategic SANG provision serving multiple authorities;
- Financial contributions pooled to fund SAMM measures across the SPA; and
- Coordinated monitoring and governance arrangements.

4.3.15 This reflects that impacts and mitigation are intrinsically cross-boundary and cannot be addressed at a single authority level.

³⁴ https://www.hart.gov.uk/sites/default/files/2024-03/Natural_England_Strategic_Access_Management_and_Monitoring_Project-tariff_guidance_2011.pdf

³⁵ <https://naturalengland.blog.gov.uk/2023/03/22/homes-around-the-heathland-giving-people-and-wildlife-the-best-place-to-live/>

Constraints and Mitigation Capacity

4.3.16 Evidence from the Hart, Rushmoor and Surrey Heath SPA Mitigation Project highlights that:

- Opportunities for delivering new SANG are increasingly limited owing to land availability constraints and viability considerations;
- A substantial proportion of the HMA lies within the SPA influence zones (up to 86-92%), restricting options for development without mitigation; and
- There is a risk that insufficient mitigation capacity could constrain housing delivery across the sub-region if alternative or additional measures are not secured.³⁶

4.3.17 In this context, housing growth in neighbouring authorities has the potential to affect the availability of shared mitigation resources, including SANG capacity, thereby influencing the ability of Rushmoor to deliver its own growth requirements.

Assessment of In-Combination Effects

4.3.18 Taking account of the above, the Local Plan will be assessed in combination with:

- Adopted and emerging local plans of neighbouring authorities within the SPA catchment;
- Anticipated housing growth across the wider Housing Market Area; and
- Other relevant plans and projects contributing to population increases within the SPA zone of influence.

4.3.19 The assessment recognises that, in the absence of avoidance and mitigation measures, the cumulative increase in population would give rise to adverse effects on the integrity of the SPA through increased recreational pressure.

4.4 Annual Housing Requirements

4.4.1 The Council adopted the Rushmoor Local Plan in February 2019. The Local Plan provides the overarching spatial strategy for Rushmoor, guiding the location, scale and type of future development up to 2032, as well as providing detailed development management policies. The adopted Local Plan sets a housing requirement of 436 dwellings per annum (dpa) over the Plan period from 2014 to 2032, equating to a total provision of approximately 7,850 homes. However, the latest Standard Method indicates a higher level of need, at around 600 dwellings per annum on an indicative basis.

³⁶ https://www.rushmoor.gov.uk/media/3b5jeljk/sang_background_paper-accessible.pdf

- 4.4.2 The adopted local plans across the other relevant authorities identify housing requirements ranging from 321 to 850 dwellings per annum, largely derived from pre-Standard Method evidence and, in several cases, incorporating redistribution of unmet need across the Housing Market Area. However, the majority of these plans are now over five years old, and recent national policy changes have significantly increased assessed housing needs.

Table 4: Comparison of Housing Requirements

Authority	Current/Adopted Plan Requirement (dwellings per annum)	Notes
Basingstoke and Deane	850	Basingstoke and Deane Local Plan (adopted May 2016) Around 1,150 dpa often cited in emerging strategy discussions.
Bracknell Forest	614	Bracknell Forest Local Plan (adopted March 2024)
Guildford	562	Guildford Borough Local Plan: Strategy and Sites (2015-2034) (adopted April 2019) Indicative updated need (not adopted): approx. 1,150+ dpa.
Hart	423	Hart Local Plan (Strategy and Sites) 2032 (adopted April 2020) However, more recent government Standard Method calculations (2024–2025) indicate a significantly higher local housing need of around 750 dpa (not yet part of an adopted plan).
Surrey Heath	321	Pre-Submission/Submitted Local Plan Increasing to approx. 640-680 dpa under latest (2024+) Standard Method (depending on adjustments).
Waverley	590	Local Plan Part 1: Strategic Policies and Sites (adopted February 2018) More recent standard method figures are higher (approx. 700+ dpa or more) but are not the adopted plan requirement.

5. Pathways of Impact

5.1 Introduction

5.1.1 In carrying out an HRA, it is important to determine the various ways in which land use plans can have an impact on European sites by following the pathways along which development can be connected with European sites. Briefly defined, pathways are routes by which a change in activity associated with a development can lead to an effect upon a European site.

5.2 Urbanisation

5.2.1 Urbanisation impacts result from an increase in population within close proximity to sensitive European sites. The detail of the impacts is distinct from the trampling, disturbance and dog-fouling that result specifically from recreational activity. The list of urbanisation impacts can be extensive, but core impacts can be singled out:

- Increased fly-tipping: rubbish-tipping is unsightly, but the principal adverse ecological effect of tipping is the introduction of invasive alien species with garden waste. Garden waste results in the introduction of invasive aliens, precisely because it is the ‘troublesome and over-exuberant’ garden plants that are typically thrown out.³⁷ Alien species may also be introduced deliberately or may be bird sown from local gardens.
- Cat predation: a survey performed in 1997 indicated that nine million British cats brought home 92 million prey items over a five-month period.³⁸ A large proportion of domestic cats are found in urban situations, and increasing urbanisation is likely to lead to increased cat predation.
- Uncontrolled fires: research in Dorset has indicated that a high proportion of heathland fires appears to be started by children and that fires are more likely to occur outside school time.³⁹ The study identified a high frequency of wildfires associated with urban areas, and these were more likely to be reported in SSSIs with densely developed areas within 500 m of their boundaries. The most detailed consideration of the link between relative

³⁷ Gilbert, O. and Bevan, D. (1997) ‘The Effect of Urbanisation on Ancient Woodlands’. *British Wildlife* 8: 213-218.

³⁸ Woods, M., McDonald, R.A. and Harris, S. (2003) ‘Predation of Wildlife by Domestic Cats *Felis catus* in Great Britain’. *Mammal Review* 33(2): 174-188.

³⁹ Kirby, J.S. and Tantrum, D.A.S. (1999) ‘Monitoring Heathland Fires in Dorset: Phase 1’. Terra Environmental Consultancy, Northampton.

proximity of development to European sites and damage to interest features has been carried out with regard to the Thames Basin Heaths SPA.

- 5.2.2 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. While the zones relating to recreational pressure expanded to 5 km (as this was determined from visitor surveys to be the principal recreational catchment for this European site), that concerning other aspects of urbanisation (particularly predation of the chicks of ground-nesting birds by domestic cats) was determined at 400 m from the SPA boundary. The Delivery Plan concluded that the adverse effects of any development located within 400 m of the SPA boundary could not be mitigated since this was the range within cats could be expected to roam as a matter of routine, and there was no realistic way of restricting their movements. As such, no new housing should be located within this zone.
- 5.2.3 Rushmoor Borough Council is a participatory organisation within the Thames Basin Heaths SPA Delivery Framework. Therefore, Rushmoor Local Plan Policy NE1 states that residential development that ‘would result in a net gain of units will not be permitted within 400 m of the SPA boundary unless, in agreement with Natural England, an appropriate assessment demonstrates that there will be no adverse effect on the SPA’. Urbanisation could also present a potential pathway of impact where development on employment sites is located within 400 m of the SPA. This will not contribute to recreational pressure but could be a source of other proximity-based urbanisation impacts (i.e., fly-tipping).

5.3 Recreational Pressure

- 5.3.1 Recreational use of a site has the potential to:
- Cause visual and noise disturbance to sensitive species, particularly ground-nesting birds, such as woodlark and nightjar, and Dartford warbler, owing to increased presence of people and dogs;
 - Prevent appropriate management or exacerbate existing management difficulties;
 - Cause damage through erosion; and
 - Cause eutrophication as a result of dog fouling.
- 5.3.2 Different types of European sites (e.g., heathland, chalk grassland) 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.

- 5.3.3 The effects of recreation on heathland sites have been described in a series of Reports.⁴⁰ It would appear that recreational pressure can have a significant adverse effect on the Annex 1 bird species for which the SPAs in this area are designated. Disturbance can have an adverse effect in various ways, with increased nest predation by natural predators, as a result of adults being flushed from the nest and deterred from returning to it by the presence of people and dogs, likely to be a particular problem. A literature review on the effects of human disturbance on bird breeding found that 36 out of 40 studies reported reduced breeding success as a consequence of disturbance.⁴¹ The main reasons given for the reduction in breeding success were nest abandonment and increased predation of eggs or young. Over the years, studies of other species have shown that birds tend to nest at lower densities in disturbed areas, particularly when there is weekday as well as weekend pressure.⁴²
- 5.3.4 A number of studies have shown that birds are affected more by dogs and people with dogs than by people alone, with birds flushing more readily, more frequently, at greater distances and for longer (Underhill-Day, 2005). In addition, dogs, rather than people, tend to be the cause of many management difficulties, notably by worrying grazing animals, and can cause eutrophication near paths. Nutrient-poor habitats, such as heathland, are particularly sensitive to the fertilising effect of inputs of phosphates, nitrogen and potassium from dog faeces.⁴³

⁴⁰ Liley, D. and Clarke R.T. (2002) 'Urban Development adjacent to Heathland Sites in Dorset: The Effect on the Density and Settlement Patterns of Annex 1 Bird Species'. English Nature Research Reports, No. 463; Murison, G. (2002) 'The Impact of Human Disturbance on the Breeding Success of Nightjar *Caprimulgus europaeus* on Heathlands in South Dorset, England'. English Nature Research Reports, No. 483; Land Use Consultants (2005) 'Going, Going, Gone? The Cumulative Impact of Land Development on Biodiversity in England'. English Nature Research Reports, No. 626; Rose, R.J. and Clarke R.T. (2005) 'Urban Impacts on Dorset Heathlands: Analysis of the Heathland Visitor Questionnaire Survey and Heathland Fires Incidence Data Sets'. English Nature Research Reports, No. 624; David Tyldesley and Associates (2005) 'Urban Impacts on Dorset Heaths: A Review of Authoritative Planning and Related Decisions'. English Nature Research Reports, No. 622; Underhill-Day, J.C. (2005) 'A Literature Review of Urban Effects on Lowland Heaths and their Wildlife'. English Nature Research Reports, No. 623.

⁴¹ Hockin, D., Oundsted, M., Gorman, M., Hill, D., Keller, V. and Barker M.A. (1992) 'Examination of the Effects of Disturbance on Birds with Reference to its Importance in Ecological Assessments'. *Journal of Environmental Management* 36: 253-286.

⁴² Van der Zande, A.N., Berkhuizen, J.C., van Letesteyn, H.C., ter Keurs, W.J. and Poppelaars, A.J. (1984) 'Impact of Outdoor Recreation on the Density of a Number of Breeding Bird Species in Woods adjacent to Urban Residential Areas'. *Biological Conservation*, 30: 1-39.

⁴³ Shaw, P.J.A., Lankey, K. and Hollingham, S.A. (1995) 'Impacts of Trampling and Dog Fouling on Vegetation and Soil Conditions on Headley Heath'. *London Naturalist*, 74: 77-82.

- 5.3.5 Underhill-Day (2005) summarises the results of visitor studies that have collected data on the use of semi-natural habitat by dogs. In surveys where 100 observations or more were reported, the mean percentage of visitors who were accompanied by dogs was 54%. However, these studies need to be treated with care. For instance, the effect of disturbance is not necessarily correlated with the impact of disturbance (i.e., the most easily disturbed species are not necessarily those that will suffer the greatest impacts). It has been shown that, in some cases, the most easily disturbed birds simply move to other feeding sites, while others may remain (possibly due to an absence of alternative sites) and thus suffer greater impacts on their population.⁴⁴ A literature review undertaken for the RSPB also urges caution when extrapolating the results of one disturbance study because responses differ between species, and the response of one species may differ according to local environmental conditions.⁴⁵ These have to be taken into account when attempting to predict the impacts of future recreational pressure on European sites.
- 5.3.6 It should be emphasised that recreational use is not inevitably a problem. Many European sites are also National Nature Reserves (e.g., Thursley Common) or nature reserves managed by Wildlife Trusts and the RSPB. At these sites, access is encouraged, and resources are available to ensure that recreational use is managed appropriately.
- 5.3.7 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 the location of new development away from such sites; local plans (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.
- Access management: restricting access to some or all of a European site. This is not usually within the remit of the Council, and restriction of access may contravene a range of government policies on access to open space and objectives for increasing exercise and improving health. However, active management of access is possible, for example, as practised on nature reserves.
 - Habitat management is not within the direct remit of the Council. However, the Council can help to set a framework for improved habitat management by

⁴⁴ Gill, J.A., Norris, K. and Sutherland, W.J. (2001) 'Why Behavioural Responses May Not Reflect the Population Consequences of Human Disturbance'. *Biological Conservation*, 97: 265-268.

⁴⁵ Woodfield, I. and Langston, R.H.W. (2004) 'Literature Review on the Impact on Bird Population of Disturbance Due to Human Access on Foot'. RSPB Research Report No. 9.

promoting cross-authority collaboration and Section 106 funding of habitat management.

- Provision of alternative recreational space can help to attract recreational users away from sensitive European sites and reduce additional pressure on them. Some species for which European sites have been designated are particularly sensitive to dogs, and many dog walkers may be happy to be diverted to other, less sensitive, sites. However, the location and type of alternative space must be attractive for users to be effective.

5.4 Atmospheric Pollution

5.4.1 The information contained in Table 5 was obtained from the Air Pollution Information System (APIS) website, which has been developed in partnership by the UK conservation agencies, regulatory agencies and the Centre for Ecology and Hydrology.⁴⁶

5.4.2 APIS provides a Site Relevant Critical Load and a Site Relevant Critical Level screening method by which it is possible to identify Critical Load or Critical Level for the most sensitive relevant habitat type or species at the habitat location chosen. Critical Loads and Critical Levels are the level of a pollutant above which habitats and species will be subject to detrimental effects, which include damage to tissues, reduction in growth and alteration in species communities.

5.4.3 APIS also provides recent air quality data for a range of atmospheric pollutants, which constitute a baseline against which the Critical Load or Level of the relevant sensitive feature may be assessed.

Table 5: Main Sources and Effects of Air Pollutants on Habitats and Species

Pollutant	Source	Effects on Habitats and Species
Acid Deposition	SO ₂ , NO _x and ammonia all contribute to acid deposition. Although future trends in S emissions and subsequent deposition to terrestrial and aquatic ecosystems will continue to decline, it is likely that increased N emissions may cancel out any gains produced by reduced S levels.	Can affect habitats and species through both wet (acid rain) and dry deposition. Some sites will be more at risk than others, depending on soil type, bedrock geology, weathering rate and buffering capacity.

⁴⁶ <https://www.apis.ac.uk/>

Pollutant	Source	Effects on Habitats and Species
Ammonia (NH ₃)	Ammonia is released following decomposition and volatilisation of animal wastes. It is a naturally occurring trace gas, but levels have increased considerably with expansion in numbers of agricultural livestock. Ammonia reacts with acid pollutants, such as the products of SO ₂ and NO _x emissions, to produce fine ammonium-containing aerosol (NH ₄ ⁺), which may be transferred much longer distances (can therefore be a significant trans-boundary issue).	Adverse effects are as a result of nitrogen deposition leading to eutrophication. As emissions mostly occur at ground level in the rural environment and NH ₃ is rapidly deposited, some of the most acute problems of NH ₃ deposition are for small relict nature reserves located in intensive agricultural landscapes.
Nitrogen Oxides (NO _x)	Nitrogen oxides are mostly produced in combustion processes. About one quarter of the UK's emissions are from power stations, one half from motor vehicles, and the rest from other industrial and domestic combustion processes.	Deposition of nitrogen compounds (nitrates) (NO ₃), nitrogen dioxide (NO ₂) and nitric acid (HNO ₃) can lead to both soil and freshwater acidification. In addition, NO _x can cause eutrophication of soils and water. This alters the species composition of plant communities and can eliminate sensitive habitats and species.
Nitrogen (N) Deposition	The pollutants that contribute to nitrogen deposition derive mainly from NO _x and NH ₃ emissions. These pollutants cause acidification (also see acid deposition) as well as eutrophication.	Species-rich plant communities with relatively high proportions of slow-growing perennial species and bryophytes are most at risk from N eutrophication owing to its promotion of competitive and invasive species which can respond readily to elevated levels of N. N deposition can also increase the risk of damage from abiotic factors (e.g., drought and frost).

Pollutant	Source	Effects on Habitats and Species
Ozone (O ₃)	A secondary pollutant generated by photochemical reactions from NO _x and volatile organic compounds (VOCs). These are mainly released by the combustion of fossil fuels. The increase in combustion of fossil fuels in the UK has led to a large increase in background ozone concentration, leading to an increased number of days when levels across the region are above 40 ppb. Reducing ozone pollution is believed to require action at international level to reduce levels of the precursors that form ozone.	Concentrations of O ₃ above 40 ppb can be toxic to humans and wildlife and can affect buildings. Increased ozone concentrations may lead to a reduction in growth of agricultural crops, decreased forest production and altered species composition in semi-natural plant communities.
Sulphur Dioxide (SO ₂)	Main sources of SO ₂ emissions are electricity generation, industry and domestic fuel combustion. Total SO ₂ emissions have decreased substantially in the UK since the 1980s.	Wet and dry deposition of SO ₂ acidifies soils and freshwater and alters the species composition of plant and associated animal communities. The significance of impacts depends on levels of deposition and the buffering capacity of soils.

5.4.4 The main pollutants of concern for the European sites of relevance to this report are oxides of nitrogen (NO_x), ammonia (NH₃) and sulphur dioxide (SO₂). NO_x can have a directly toxic effect upon vegetation. In addition, greater NO_x or ammonia concentrations within the atmosphere will lead to greater rates of nitrogen deposition to soils. An increase in the deposition of nitrogen from the atmosphere to soils is generally regarded to lead to an increase in soil fertility, which can have a serious deleterious effect on the quality of semi-natural, nitrogen-limited terrestrial habitats.

5.4.5 Sulphur dioxide emissions are overwhelmingly influenced by the output of power stations and industrial processes that require the combustion of coal and oil. Ammonia emissions are dominated by agriculture, with some chemical processes also making notable contributions. As such, it is unlikely that material increases in SO₂ or NH₃ emissions will be associated with local plans. NO_x emissions, however, are dominated by the output of vehicle exhausts (more than half of all emissions).

5.5 Water Abstraction

- 5.5.1 South East Water is responsible for the supply of water in Rushmoor. It divides its supply area into water resource zones and identifies that Rushmoor falls within Water Resource Zone 4 (WRZ4), which also includes Basingstoke, Bracknell and Maidenhead. Based on its latest Water Resources Management Plan (WRMP24), South East Water indicates that demand across its supply area has continued to increase since 2019/20, reflecting population growth and higher per-capita consumption, with baseline forecasts for the mid-2020s showing a modest uplift compared to the previous WRMP19 position.⁴⁷
- 5.5.2 The supply of water within the area continues to be drawn predominantly from groundwater sources, with the company reporting that around 70% of its supply is derived from groundwater aquifers, supplemented by surface water sources (including rivers and reservoirs) and smaller transfers from other suppliers.⁴⁸ Water consumption across the South East Water area in 2024/25 was approximately 143 litres per person per day (with a three-year average of around 145.7 litres per person per day), compared with a national average of around 136-137 litres per person per day in England.
- 5.5.3 South East Water's latest Water Resource Management Plan (WRMP24), covering the period to 2075, confirms that the supply area continues to experience acute water stress and that this is likely to be exacerbated by climate change and significant population growth.
- 5.5.4 The South East Water supply area was designated as an Area of Serious Water Stress by the Department for Environment, Food and Rural Affairs (DEFRA) in 2007, which is defined by the Environment Agency as an area where current or future household demand for water is a high proportion of the effective rainfall available to meet that demand. The Environment Agency reviewed water-stressed areas in 2021 and confirmed that the South East Water supply area remains designated as an Area of Serious Water Stress, with no subsequent change in designation.
- 5.5.5 In anticipation of increased water stress in the future owing to climate change and population growth, the WRMP identifies the need to provide a new treatment scheme in Bracknell and to manage this significant challenge by means of leakage

⁴⁷ <https://www.southeastwater.co.uk/about/resources/publications/water-resources-management-plan-2024/>

⁴⁸ <https://www.southeastwater.co.uk/about/resources/publications/water-resources-management-plan-2024/>

reduction, water efficiency measures, water treatment, regional transfers of water and new reservoirs.

- 5.5.6 The determination of surplus or deficit takes account of environmental limits, and the implication is that there should be no requirement for damaging levels of abstraction from any aquifers connected to these European sites.

5.6 Water Quality

- 5.6.1 The main sources of water quality information are river basin management plans which provide information on the ecological and chemical status of water bodies. The Environment Agency keeps a catchment data tool which supports and builds on river basin management plans.⁴⁹ Rushmoor is located within the Thames River Basin District, a wider area that covers 16,200 square kilometres, and lies within the Loddon and Trib Management Catchment, which covers an area of 680 square kilometres across Hampshire, Berkshire and Surrey.⁵⁰
- 5.6.2 The latest river basin management plan for the Thames River Basin District (2022) identifies five key challenges which limit the uses and potential benefits of managing the water environment in a sustainable way.⁵¹ These are:
- Physical modifications: affecting approximately 44% of water bodies in the river basin district. This includes flood defences and weirs, and changes to the size and shape of natural river channels for land drainage, urban development and navigation. These alterations can significantly affect natural habitats and ecological processes.
 - Pollution from wastewater: affecting around 45% of water bodies in the river basin district and includes wastewater, or sewage, from treatment works and privately owned septic tanks. Population growth, urbanisation and more intense rainfall events linked to climate change are increasing pressure on the sewer network and treatment capacity.
 - Pollution from towns, cities and transport: affecting approximately 17% of water bodies in the river basin district. This includes contaminated surface runoff from urban areas, roads and transport infrastructure, which carries pollutants such as oils, metals and sediments into watercourses.
 - Changes to the natural flow and level of water: affecting about 12% of water bodies in the river basin district. Reduced flows and altered groundwater

⁴⁹ <https://environment.data.gov.uk/catchment-planning/>.

⁵⁰ <https://environment.data.gov.uk/catchment-planning/RiverBasinDistrict/6;>
<https://environment.data.gov.uk/catchment-planning/ManagementCatchment/3048>.

⁵¹ https://assets.publishing.service.gov.uk/media/635248048fa8f554cca7b226/Thames_river_basin_management_plan_2022_HRA.pdf

levels, caused by abstraction and changing rainfall patterns, can result in insufficient water availability for people, agriculture and the natural environment. Climate change is expected to lead to more pronounced seasonal variations, with higher winter flows, lower summer flows and an overall reduction in water availability in the long term.

- Negative effects of invasive non-native species: affecting around 3% of water bodies in the river basin district. These species can damage ecosystems and have significant economic impacts. Climate change is expected to increase the spread and establishment of invasive species, further affecting the condition and resilience of water bodies.

5.6.3 The status of the main watercourses in the borough using the Water Framework Directive is as follows:

- River Blackwater (Aldershot to Cove Brook confluence at Hawley) achieved ‘moderate’ ecological status in 2019 and remains ‘moderate’ in the latest (2022) classification, having improved from ‘poor’ in 2016, but continues to fail the assessment of chemical status (2019 and 2022), a reduction from ‘good’ in 2016.⁵²
- Cove Brook achieved ‘poor’ ecological status in 2019 and remains ‘poor’ in the latest (2022) classification, an improvement from ‘bad’ in 2016, and continues to fail the assessment of chemical status (2019 and 2022), a reduction from ‘good’ in 2016.⁵³
- Basingstoke Canal achieved ‘moderate’ ecological status in 2016 and 2019 and remains ‘moderate’ in the latest (2022) classification but continues to fail the assessment of chemical status (2019 and 2022), down from ‘good’ in 2016.⁵⁴

5.6.4 Development within Rushmoor over the Plan period will increase wastewater production. Wastewater from the borough is treated by Thames Water and discharged to the River Blackwater, which ultimately drains to the River Thames. Development within Rushmoor falls into the catchments of three waste-water treatment works (WwTWs): Camp Farm, Aldershot and Camberley.

5.6.5 A Joint Water Cycle Study (WCS) for Rushmoor, Hart and Surrey Heath was published in May 2017. The WCS includes an ecological appraisal which identified a need for water quality modelling to take place for the following waste-water treatment works:

⁵² <https://environment.data.gov.uk/catchment-planning/WaterBody/GB106039017180>

⁵³ <https://environment.data.gov.uk/catchment-planning/WaterBody/GB106039017130>

⁵⁴ <https://environment.data.gov.uk/catchment-planning/WaterBody/GB70610019>

- Camp Farm WwTW
- Fleet WwTW
- Hartley Wintney WwTW
- Camberley WwTW
- Lightwater WwTW
- Eversley WwTW

5.6.6 The water quality modelling identifies the designated wildlife sites with pathways linking to WwTWs. The Thames Basin Heaths SPA is identified as being located in proximity to a waterbody that receives discharge from the Hartley Wintney and Fleet WwTWs. As noted above, planned development in Rushmoor will not be within the catchment of either of these WwTWs. The only other internationally important wildlife site that is geographically close to the WCS area is Thursley, Ash, and Pirbright and Chobham SAC. This internationally designated site does not receive surface water from the watercourses linked to the modelled WwTWs, and its features for designation are not sensitive to changes in water quality that could be associated with the six WwTWs modelled. The Council is planning to update the WCS for Rushmoor in the upcoming months.

6. Summary

- 6.1 This report provides contextual information to inform the formal Stage 1 screening phase of a habitats regulations assessment for the new Local Plan.
- 6.2 The Stage 1 screening process will build on the information within this report to provide an evidence base against which to quantitatively assess if, or what aspects of, the new Local Plan would be likely to have a significant effect on the conservation objectives of a habitats site, either alone or in combination with other plans or projects.
- 6.3 Since this report is not intended to provide a Stage 1 screening decision, the Council is not formally seeking Natural England's view on, or agreement with, conclusions drawn at this stage. However, Natural England's comments on the broad scope of evidence provided and potential impact pathways would be very useful in focussing attention on where evidence and/or impact pathways may need to be reviewed.

Council Offices,
Farnborough Road,
Farnborough,
Hants, GU14 7JU

www.rushmoor.gov.uk
01252 398 399
customerservices@rushmoor.gov.uk

 @rushmoorcouncil
 Rushmoor Borough Council
June 2026