New Alresford Neighbourhood Plan

Habitats Regulations Assessment Report

New Alresford Town Council

Final report
Prepared by LUC
December 2025

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1	Draft HRA report	K Sydney A Jennings	K Nicholls	K Nicholls	30.10.2025
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Introduction

1.1 LUC has been commissioned by New Alresford Town Council to carry out a Habitats Regulations Assessment (HRA) of its emerging Neighbourhood Plan.

1.2 The purpose of this report is to identify likely significant effects associated with the proposed development within the Neighbourhood Plan and whether, when mitigation is taken into account, there will be adverse effects on the integrity of any Habitats Sites.

Background to the Neighbourhood Plan

1.3 The Neighbourhood Plan sets out principles that guide development within New Alresford and applies to the entirety of the New Alresford Town Council (NATC) area, as defined by the parish boundary.

1.4 The Neighbourhood Plan is being prepared within the framework of the adopted Winchester District Local Plan and the emerging Winchester District Local Plan 2020-2040. The Local Plan, which is currently at the Main Modifications stage following Examination, allocates the following sites within New Alresford:

- NA1 The Dean, c.130 homes;
- NA2 Sun Lane, c.325 homes, 5ha employment uses, and 15ha of informal and recreational open space and a burial ground; and
- NA3 Neighbourhood Plan designated area, c.100 within the Neighbourhood Plan area.

1.5 The supporting text of Policy NA3 (as proposed to be modified in the Local Plan) states that additional land will be allocated for development in the New Alresford Neighbourhood Plan for about 100 dwellings, including any amendments to the settlement boundary. If the New Alresford Neighbourhood Plan does not successfully go through to a referendum, the housing requirement of 100 dwellings will be addressed in the early Local Plan review.

1.6 Work on the Neighbourhood Plan began in November 2021, in tandem with Winchester's Local Plan. Consultation was undertaken in April 2022, July 2023 and November 2024 to gather feedback on key issues for the town to be addressed by the new Neighbourhood Plan, and to inform the preparation of the draft policies and site allocations.

The requirement to undertake Habitats Regulations

Assessment of development plans

1.7 The requirement to undertake HRA of development plans was confirmed by the amendments to the Habitats Regulations published for England and Wales in 2007; the currently applicable version is the Habitats Regulations 2017, as amended. When preparing its new Neighbourhood Plan, NATC is therefore required by law to carry out an HRA. NATC can commission consultants to undertake HRA work on its behalf and this (the work documented in this report) is then reported to and considered by NATC as the 'competent authority'. NATC will consider this work and would usually only progress the Neighbourhood Plan if it considers that the Plan will not adversely affect the integrity **[See reference 1]** of any Habitats Site (the exception to this would be where 'imperative reasons of overriding public interest' can be demonstrated; see paragraph 1.18). The requirement for authorities to comply with the Habitats Regulations when preparing a Local Plan is also noted in the Government's online Planning Practice Guidance **[See reference 2]** (PPG).

1.8 HRA refers to the assessment of the potential effects of a development plan on one or more sites afforded the highest level of protection in the UK: Special Protection Areas (SPAs) and Special Areas of Conservation (SACs). These were classified under European Union (EU) legislation but, since 1 January 2021, are protected in the UK by the Habitats Regulations 2017 (as amended). Although the EU Directives from which the UK's Habitats Regulations originally derived are no longer binding, the Regulations still make reference to the lists of habitats and species that the sites were designated for, which are listed in annexes to the EU Directives:

- SACs are designated under the Habitats Regulations and target particular habitat types (specified in Annex 1) and species (Annex II). The listed habitat types and species (excluding birds) are those considered to be most in need of conservation at a European level. Designation of SACs also has regard to the threats of degradation or destruction to which the sites are exposed and, before EU exit day, to the coherence of the Natura 2000 network of European (now 'Habitats') sites. After EU exit day, regard is had to the importance of such sites for the coherence of the national site network.
- SPAs are classified in accordance with Article 4(1) of the European Union Birds Directive **[See reference 3]** for rare and vulnerable birds (Annex I), and under Article 4(2) for regularly occurring migratory species not listed in Annex I.

1.9 The term 'European sites' was previously commonly used in HRA to refer to 'Natura 2000' sites **[See reference 4]** and Ramsar sites (international designated under the Ramsar Convention). However, a Government Policy Paper **[See reference 5]** on changes to the Habitats Regulations 2017 post-Brexit states that:

- Any references to Natura 2000 in the 2017 Regulations and in guidance now refers to the new 'national site network'.
- The national site network includes existing SACs and SPAs; and new SACs and SPAs designated under these Regulations.
- Designated Wetlands of International Importance (known as Ramsar sites) do not form part of the national site network. Many Ramsar sites overlap with SACs and SPAs and may be designated for the same or different species and habitats.

1.10 Although Ramsar sites do not form part of the new national site network, Government guidance **[See reference 6]** states that:

“Any proposals affecting the following sites would also require an HRA because these are protected by government policy:

- proposed SACs
- potential SPAs
- Ramsar sites - wetlands of international importance (both listed and proposed)
- areas secured as sites compensating for damage to a European site.”

1.11 Furthermore, the NPPF **[See reference 7]** and good practice guidance **[See reference 8]** currently state that competent authorities responsible for carrying out HRA should treat Ramsar sites in the same way as SACs and SPAs. The legislative requirement for HRA does not apply to other nationally designated wildlife sites such as Sites of Special Scientific Interest or National Nature Reserves.

1.12 For simplicity, and in line with common usage, this report uses the term 'Habitats Sites' to refer to all types of designated site within the 'national site network' for which Government guidance **[See reference 9]** requires an HRA.

1.13 The overall purpose of an HRA is to conclude whether or not a proposal or policy, or whole development plan would adversely affect the integrity of the site in question. This is judged in terms of the implications of the plan for a site’s ‘qualifying features’ (i.e. those Annex I habitats, Annex II species, and Annex I bird populations for which it has been designated). Significantly, HRA is based on the precautionary principle. Where uncertainty or doubt remains, an adverse effect should be assumed.

Stages of HRA

1.14 The HRA of development plans is undertaken in stages (as described below) and should conclude whether or not a proposal would adversely affect the integrity of the Habitats Site in question.

1.15 LUC has been commissioned by NATC to carry out HRA work on the Council's behalf, and the outputs will be reported to and considered by NATC, as the competent authority, before adopting the Plan.

1.16 The HRA also requires close working with Natural England as the statutory nature conservation body **[See reference** 10**]** in order to obtain the necessary information, agree the process, outcomes and mitigation proposals. The Environment Agency, while not a statutory consultee for the HRA, is also in a strong position to provide advice and information throughout the process as it is required to undertake HRA for its existing licences and future licensing of activities.

Requirements of the Habitats Regulations

1.17 In assessing the effects of a Neighbourhood Plan in accordance with Regulation 105 of the Conservation of Habitats and Species Regulations 2017 (as amended) (the 'Habitats Regulations'), there are potentially two tests to be applied by the competent authority: a 'Significance Test' followed, if necessary, by an Appropriate Assessment which would inform the 'Integrity Test'. The relevant sequence of questions is as follows:

- Step 1: Under Reg. 105(1)(b), consider whether the plan is directly connected with or necessary to the management of the sites. If not, proceed to Step 2.
- Step 2: Under Reg. 105(1)(a) consider whether the plan is likely to have a significant effect on a European site, either alone or in combination with other plans or projects (the 'Significance Test'). If yes, proceed to Step 3.

1.18 [Steps 1 and 2 are undertaken as part of Stage 1: HRA Screening, described in 'typical stages', below.]

- Step 3: Under Reg. 105(1), make an Appropriate Assessment of the implications for the European site in view of its current conservation objectives (the 'Integrity Test'). In so doing, it is mandatory under Reg. 105(2) to consult Natural England, and optional under Reg. 105(3) to take the opinion of the general public.

1.19 [This step is undertaken during Stage 2: Appropriate Assessment, described in 'typical stages', below.]

- Step 4: In accordance with Reg. 105(4), but subject to Reg. 107, give effect to the land use plan only after having ascertained that the plan would not adversely affect the integrity of a European site.

1.20 [This step follows Stage 2 where a finding of 'no adverse effect' is concluded. If it cannot be it proceeds to Step 5 as part of Stage 3 of the HRA process]

- Step 5: Under Reg. 107, if Step 4 is unable to rule out adverse effects on the integrity of a European site and no alternative solutions exist then the competent authority may nevertheless agree to the plan or project if it must be carried out for 'imperative reasons of overriding public interest' (IROPI).

1.21 [This step is undertaken during Stage 3: Assessment where no alternatives exist and adverse impacts remain, taking into account mitigation described in 'typical stages' below.]

Typical stages

1.22 The section summarises the stages and associated tasks and outcomes typically involved in carrying out a full HRA of a development plan, based on various guidance documents **[See reference** 11**]**, **[See reference** 12**]**, **[See reference** 13**]**.

1.23 It is normally anticipated that an emphasis on Stages 1 and 2 of this process will, through a series of iterations, help ensure that potential adverse effects are identified and eliminated through the inclusion of mitigation measures designed to avoid or reduce effects. The need to consider alternatives could imply more onerous changes to a plan document. It is generally understood that so called 'imperative reasons of overriding public interest' (IROPI) are likely to be justified only very occasionally and would involve engagement with the Government.

Stage 1: HRA Screening

1.24 Tasks at this stage:

- Description of the development plan and confirmation that it is not directly connected with or necessary to the management of Habitats Sites.
- Identification of potentially affected Habitats Sites and their conservation objectives **[See reference** 14**]**.

- Assessment of likely significant effects of the development plan alone or in combination with other plans and projects, prior to consideration of avoidance or reduction ('mitigation') measures **[See reference** 15**]**.

1.25 Outcome of this stage:

- Where effects are unlikely, prepare a 'finding of no significant effect report'.
- Where effects judged likely, or lack of information to prove otherwise, proceed to Stage 2.

Stage 2: Appropriate Assessment

1.26 This stage is undertaken when Stage 1 does not result out likely significant effects.

1.27 Tasks at this stage:

- Information gathering (development plan and Habitats Sites **[See reference** 16**]**).
- Impact prediction.
- Evaluation of development plan impacts in view of conservation objectives of Habitats Sites.
- Where impacts are considered to directly or indirectly affect qualifying features of Habitats Sites, identify how these effects will be avoided or reduced ('mitigation').

1.28 Outcome of this stage:

- Appropriate assessment report describing the plan, European site baseline conditions, the adverse effects of the plan on the European site, how these effects will be avoided or reduced, including the mechanisms and timescale for these mitigation measures.
- If effects remain after all alternatives and mitigation measures have been considered proceed to Stage 3.

Stage 3: Assessment where no alternatives exist and adverse impacts remain, taking into account mitigation

1.29 Tasks at this stage:

- Identify 'imperative reasons of overriding public interest' (IROPI).

- Demonstrate no alternatives exist.
- Identify potential compensatory measures.

1.30 Outcome of this stage:

- This stage should be avoided if at all possible. The test of IROPI and the requirements for compensation are extremely onerous.

Relevant case law

1.31 This HRA has been prepared in accordance with relevant case law findings, including most notably the 'People over Wind' and 'Holohan' rulings from the Court of Justice for the European Union (CJEU).

1.32 The People over Wind, Peter Sweetman v Coillte Teoranta (April 2018) judgment ruled that Article 6(3) of the Habitats Directive should be interpreted as meaning that mitigation measures should be assessed as part of an Appropriate Assessment and should not be taken into account at the screening stage. The precise wording of the ruling is as follows:

> "Article 6(3) ……must be interpreted as meaning that, in order to determine whether it is necessary to carry out, subsequently, an appropriate assessment of the implications, for a site concerned, of a plan or project, it is not appropriate, at the screening stage, to take account of measures intended to avoid or reduce the harmful effects of the plan or project on that site.

1.33 In light of the above, the HRA screening stage does not rely upon avoidance or mitigation measures to draw conclusions as to whether the Neighbourhood Plan could result in likely significant effects on Habitats Sites, with any such measures being considered at the Appropriate Assessment stage as relevant.

1.34 This HRA also fully considers the Holohan v An Bord Pleanala (November 2018) judgement which stated that:

Article 6(3) of Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora must be interpreted as meaning that an 'appropriate assessment' must, on the one hand, catalogue the entirety of habitat types and species for which a site is protected, and, on the other, identify and examine both the implications of the proposed project for the species present on that site, and for which that site has not been listed, and the implications for habitat types and species to be found outside the boundaries of that site, provided that those implications are liable to affect the conservation objectives of the site.

Article 6(3) of Directive 92/43 must be interpreted as meaning that the competent authority is permitted to grant to a plan or project consent which leaves the developer free to determine subsequently certain parameters relating to the construction phase, such as the location of the construction compound and haul routes, only if that authority is certain that the development consent granted establishes conditions that are strict enough to guarantee that those parameters will not adversely affect the integrity of the site.

Article 6(3) of Directive 92/43 must be interpreted as meaning that, where the competent authority rejects the findings in a scientific expert opinion recommending that additional information be obtained, the 'appropriate assessment' must include an explicit and detailed statement of reasons capable of dispelling all reasonable scientific doubt concerning the effects of the work envisaged on the site concerned.

1.35 In undertaking this HRA, LUC has fully considered the potential for effects on species and habitats, including those not listed as qualifying features, to result in secondary effects upon the qualifying features of Habitats Sites, including the potential for complex interactions and dependencies. In addition, the potential for offsite impacts, such as through impacts to functionally linked land, and or species and habitats located beyond the boundaries of European site, but which may be important in supporting the ecological processes of the qualifying features, has also been fully considered in this HRA.

1.36 In addition to this, the HRA has taken into consideration the 'Wealden' judgement and the 'Dutch Nitrogen Case' judgements from the Court of Justice for the European Union.

1.37 Wealden District Council v Secretary of State for Communities and Local Government, Lewes District Council and South Downs National Park Authority (2017) ruled that it was not appropriate to scope out the need for a detailed assessment for an individual plan or project based on the annual average daily traffic (AADT) figures detailed in the Design Manual for Roads and Bridges or the critical loads used by Defra or Environmental Agency without considering the in-combination impacts with other plans and projects.

1.38 In light of this judgement, the HRA therefore considers traffic growth based on the effects of development from the Neighbourhood Plan in combination with other drivers of growth such as development proposed in neighbouring districts and demographic change.

1.39 The 2018 'Coöperatie Mobilisation for the Environment and Vereniging Leefmilieu (Dutch Nitrogen)' judgement stated that:

> "May the positive effects of the autonomous decrease in the nitrogen deposition … be taken into account in the appropriate assessment…, it is important that the autonomous decrease in the nitrogen deposition be monitored and, if it transpires that the decrease is less favourable than had been assumed in the appropriate assessment, that adjustments, if required, be made."

1.40 The Dutch Nitrogen judgement also states that according to previous case law:

> "…it is only when it is sufficiently certain that a measure will make an effective contribution to avoiding harm to the integrity of the site concerned, by guaranteeing beyond all reasonable doubt that the plan or project at issue will not adversely affect the integrity of that site, that such a measure may be taken into consideration in the 'appropriate assessment' within the meaning of Article 6(3) of the Habitats Directive".

1.41 The HRA of the Neighbourhood Plan therefore only considers the existence of conservation and/or preventative measures if the expected benefits of those measures are certain at the time of the assessment. If a threshold approach is applied, it is necessary to consider the risk of significant effects being produced even

if below the threshold values to ensure that there is no adverse effect on integrity of the Habitats Sites.

Previous HRA work

1.42 There is no previously published HRA work on the New Alresford Neighbourhood Plan; however, HRA has been undertaken for the emerging Winchester Local Plan, which this HRA of the Neighbourhood Plan draws on:

- Winchester Local Plan HRA (Regulation 19), July 2024 **[See reference** 17**]**;
- Winchester Local Plan Winchester Local Plan HRA addendum to Reg.19 HRA, November 2024 **[See reference** 18**]**; and
- Winchester Local Plan HRA Supplementary Information: Air Quality at SAC Compensatory Habitats, March 2025 **[See reference** 19**]**.

1.43 The Winchester Local Plan HRA identified a number of impact pathways that are relevant to the HRA of the New Alresford Neighbourhood Plan. The criteria for identifying likely significant effects and impact pathways identified in the Neighbourhood Plan HRA are in line with the Winchester Local Plan HRA work.

Structure of the HRA report

1.44 This chapter has introduced the requirement to undertake HRA of the New Alresford Neighbourhood Plan. The remainder of the report is structured as follows:

- Chapter 2: New Alresford Neighbourhood Plan summarises the content of the plan that is the subject of this report.
- Chapter 3: Approach to the HRA sets out the methodology followed during the screening and Appropriate Assessment stages of the HRA.
- Chapter 4: HRA Screening describes the findings of the screening stage of the HRA.
- Chapter 5: Appropriate Assessment sets out the findings of the Appropriate Assessment stage of the HRA.

- Chapter 6: Conclusions summarises the HRA conclusions for the draft Neighbourhood Plan.
- Appendix A: Attributes of Habitats Sites assessed lists relevant features of the SACs, SPAs and Ramsar sites.
- Appendix B: HRA Screening sets out the results of the screening stage for each Neighbourhood Plan policy and site allocation.

Chapter 2
New Alresford Neighbourhood Plan

2.1 The New Alresford Neighbourhood Plan is being developed by New Alresford Town Council and corresponds to the New Alresford Town Council area. The Town Council have prepared draft policies and site options to be considered within this HRA.

New Alresford draft Neighbourhood Plan policies and site options

2.2 The emerging Winchester Local Plan allocates two sites for development in New Alresford (Figure 2.1) and states that additional land will be allocated for development of about 100 dwellings in the Neighbourhood Plan area:

- NA1 The Dean c.130 dwellings;
- NA2 Sun Lane, c.320 dwellings; and
- NA3 New Alresford Neighbourhood Plan designated area, c.100 dwellings.

2.3 The draft Neighbourhood Plan site options seek to establish where within New Alresford the development associated with Local Plan allocation policy NA3 should go, and how it should be delivered.

Policies

2.4 The draft Neighbourhood Plan sets out 17 planning policies that will be used to help determine planning applications for development:

- Policy: Architecture and Urban Design;
- Policy: Community Facilities;
- Policy: Delivery, Monitoring and Review;
- Policy: Employment;
- Policy: Green and Blue Infrastructure and Local Green Spaces;
- Policy: Historic Environment;
- Policy: Locally Designated Heritage Assets;

- Policy: Housing Strategy;
- Policy: Housing Size, Type and Mix;
- Policy: Key Views;
- Policy: Landscape;
- Policy: Local Green Spaces;
- Policy: Movement and Access;
- Policy: The Safeguarded Watercress Way;
- Policy: New Alresford Settlement Boundary;
- Policy: Sustainable Tourism / Visitor Economy; and
- Policy: The Town Centre.

Site options

2.5 The following six sites were identified through the New Alresford Neighbourhood Plan Call for Sites and the Winchester Strategic Housing and Economic Land Availability Assessment (SHELAA) (2021). These sites are all under consideration for allocation for residential development in the New Alresford Neighbourhood Plan and have been assessed in this HRA.

Table 2.1: Site options

Site reference	Site name	Site size (ha)
NA01	Thody's, New Farm Road, New Alresford	3.853
NA02	Land at Perins School, Pound Hill	0.434
NA06	Land adjacent Arlebury Park	2.614
NA07	Land off Drove Lane	6.177
NA08	Land on the east side of Bridge Road	0.195
NA09	The Spinney Caravan Site, Arlebury Park, New Alresford	0.738

HRA of New Alresford Neighbourhood Plan
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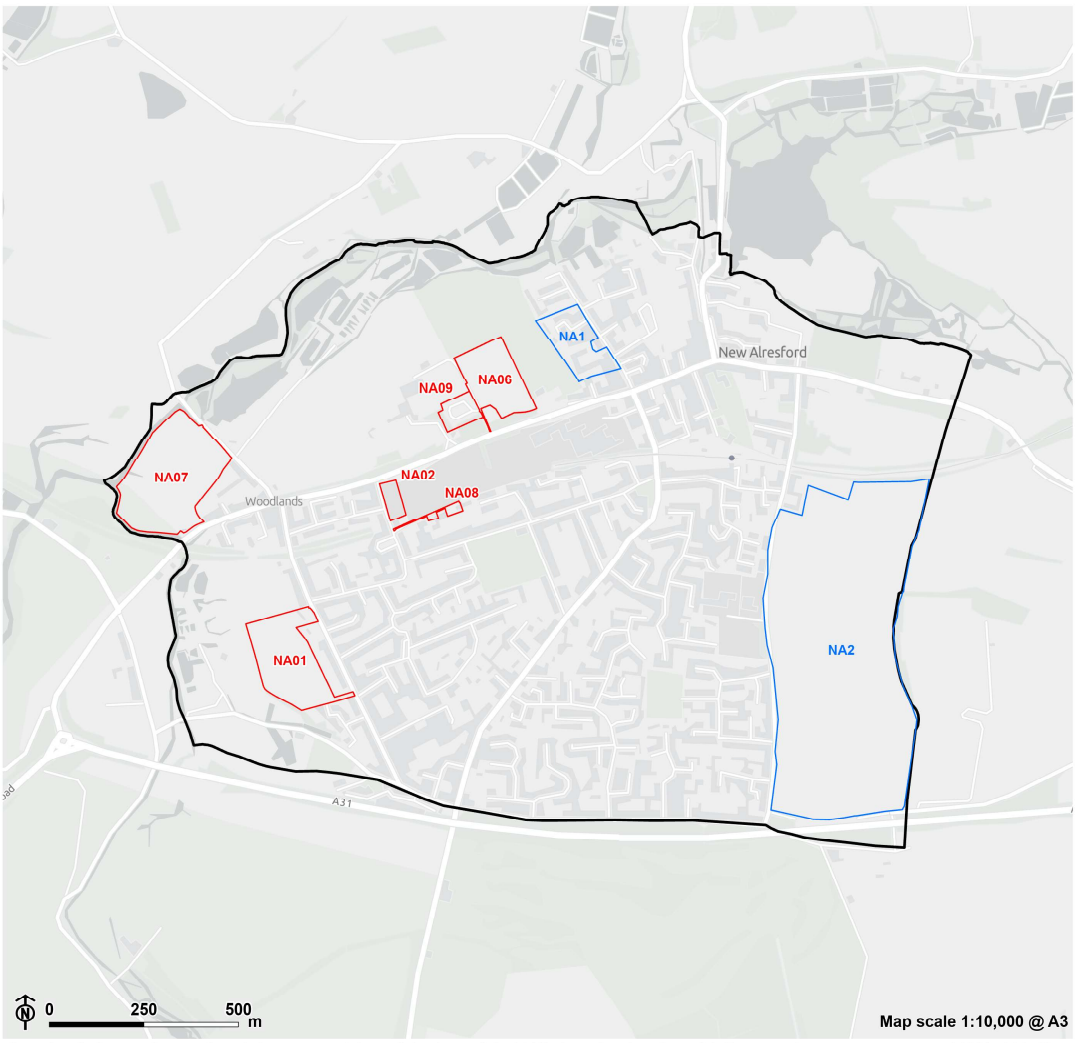
Figure 2.1 New Alresford site options



New Alresford Parish boundary
Neighbourhood plan site option
Other site allocated in Local Plan

Chapter 3
Approach to HRA

3.1 This chapter describes the method that has been used in the HRA of the Neighbourhood Plan, including the specific tasks that have been undertaken and the assumptions that underpin the HRA judgements made.

Screening assessment

3.2 HRA Screening of the plan has been undertaken in line with current available guidance and seeks to meet the requirements of the Habitats Regulations. The tasks that have been undertaken during the screening stage of the HRA and the conclusions reached are described in detail below.

3.3 The purpose of the screening stage is to:

- Identify all aspects of the plan which would have no effect on a Habitats Site, so that that they can be eliminated from further consideration in respect of this and other plans;
- Identify all aspects of the plan which would not be likely to have a significant effect on a Habitats Site (i.e. would have some effect, because of links/connectivity, but which are not significant), either alone or in combination with other aspects of the same plan or other plans or projects, which therefore do not require 'appropriate assessment'; and
- Identify those aspects of the plan where it is not possible to rule out the risk of significant effects on a Habitats Site, either alone or in combination with other plans or projects. This provides a clear scope for the parts of the plan that will require appropriate assessment.

Identification of Habitats Sites that may be affected by the Plan

3.4 In order to initiate the search of Habitats Sites that could potentially be affected by the Neighbourhood Plan, it is established practice in HRAs to consider Habitats Sites within the area covered by a plan, and also within a buffer distance from the boundary of the plan area.

3.5 In line with the HRA of the Winchester Local Plan, a distance of 15km has been used as a starting point to identify Habitats Sites likely to be affected by impacts relating to development within the Plan area. In addition to this, consideration has

also been given to Habitats Sites connected to the plan area beyond this distance, for example through hydrological pathways.

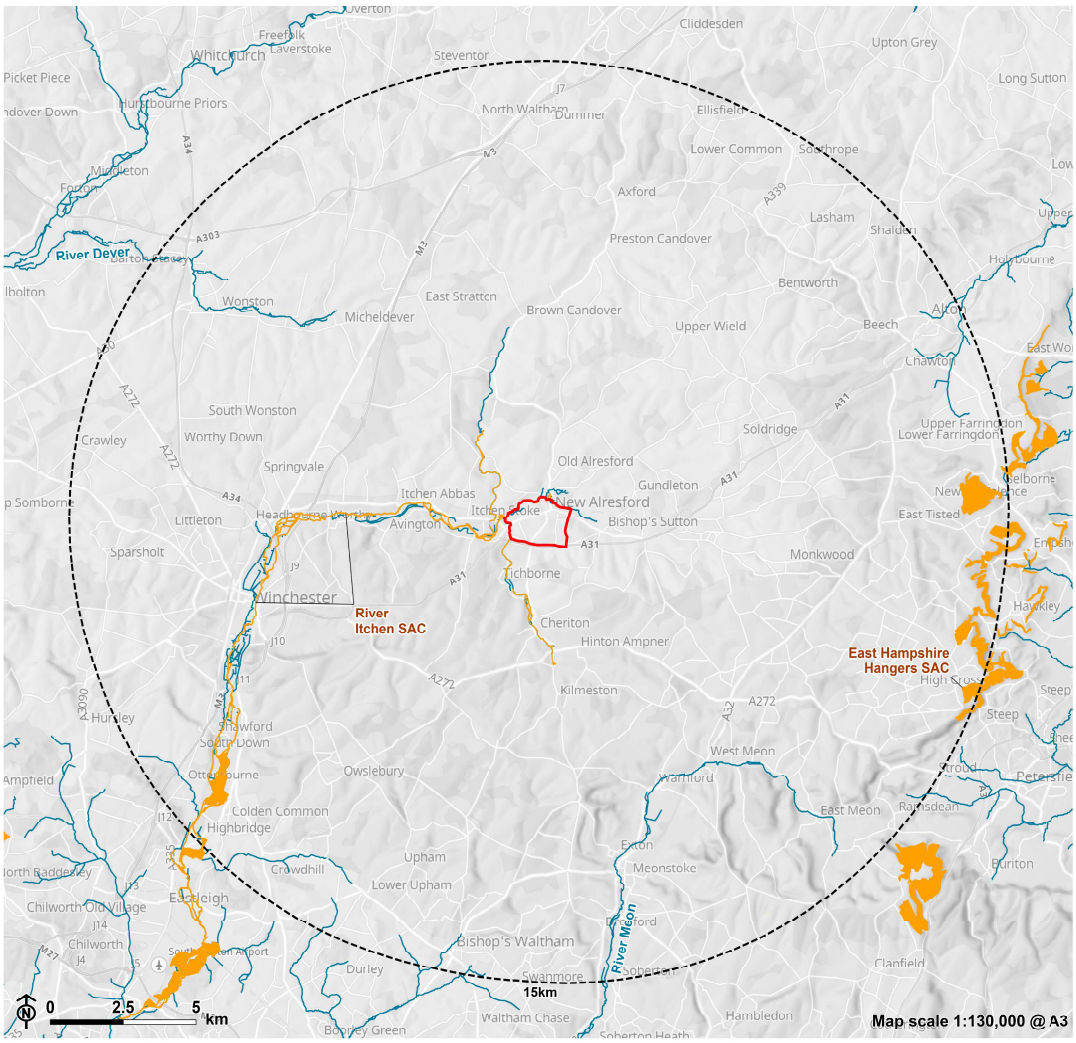
3.6 Impacts from development in areas outside of the Habitats Site boundaries may also occur where habitat contributes towards maintaining the interest feature for which the Habitats Site is designated (known as 'functionally linked land'). This includes land which may provide offsite foraging or breeding habitats.

3.7 Habitats Sites within 15km of the Neighbourhood Plan area are set out below and shown on Figure 3.1. Further information about each site is set out Appendix A. No sites beyond 15km are considered to have potentially significant connectivity to the Plan area.

3.8 The following Habitats Sites are within 15km of the Plan area:

- River Itchen SAC, partially within plan area.
- SAC Compensatory Habitat (River Meon), c.8.8km southeast.
- SAC Compensatory Habitat (River Dever), c.9.3km northwest.
- East Hampshire Hangers SAC, c.13.6km east.

3.9 The requirement to assess SAC Compensatory Habitats has been confirmed through the HRA work for Winchester Local Plan. The SAC Compensatory Habitats are in place following changes to Southern Water abstraction licences and to protect the River Itchen Special Area of Conservation (SAC). Within 15km of the Neighbourhood Plan area, they cover the whole of the River Meon catchment including winterbournes, which is designated for Atlantic Salmon and chalk stream habitat; and the River Dever catchment (part of the River Test catchment) including winterbournes, which is designated for chalk stream habitat.



HRA of New Alresford Neighbourhood Plan
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Figure 3.1 Habitat Sites within 15km of the Neighbourhood Plan area

New Alresford Neighbourhood Plan boundary
15km buffer
River
Habitat Sites

Fig3_1_Habitat_Sites_Within_15km_r0_A3L 30/10/2025

3.10 The designated features and conservation objectives of the Habitats Sites, together with current pressures and potential threats, has been established using Data Forms for SACs and SPAs **[See reference** 20**]** and Information Sheets for Ramsar Wetlands published on the JNCC website **[See reference** 21**]**, as well as Natural England's Site Improvement Plans **[See reference** 22**]**, Supplementary Advice Notes **[See reference** 23**]** and the most recent conservation objectives published on the Natural England website **[See reference** 24**]**). This analysis enables Habitats Site interest features to be identified, along with the features of each Habitats Site which determine site integrity and the specific sensitivities and threats facing the site. This information is then used to inform an assessment of how the potential impacts of the Neighbourhood Plan may result in likely significant effects on each of the Habitats Sites in question, either alone or in-combination.

Functionally linked land (FLL)

3.11 The term 'functional linkage' can be used to refer to the role or 'function' that land beyond the boundary of a Habitats Site might fulfil in terms of supporting the populations for which the site was designated or classified. Such an area is therefore 'linked' to the site in question because it provides a (potentially important) role in maintaining or restoring a protected population at favourable conservation status.

3.12 Whilst the boundary of a Habitats Site will usually be drawn to include key supporting habitat for a qualifying species, this cannot always be the case where the population for which a site is designated or classified is particularly mobile. Individuals of the population will not necessarily remain in the site all the time. Sometimes, the mobility of qualifying species is considerable and may extend so far from the key habitat that forms the SAC or SPA that it would be entirely impractical to attempt to designate or classify all of the land or sea that may conceivably be used by the species.

3.13 Damage or loss of off-site habitat (i.e. land outside Habitats Sites that is functionally linked as it may be used by the qualifying species of a site) is more likely to be an issue for highly mobile species, particularly birds and bats. The potential for FLL within the Plan area has therefore been considered for all Habitats Sites with mobile qualifying species, i.e.:

- River Itchen SAC:
  - southern damselfly, otter (FLL screened in for both); and
  - white-clawed (or Atlantic stream) crayfish, brook lamprey, Atlantic salmon, and bullhead (FLL screened out for these species).

- SAC Compensatory Habitats (River Meon):
  - Atlantic salmon (FLL screened out).

HRA of New Alresford Neighbourhood Plan
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Figure 3.2 River Itchen SAC and habitats that could be functionally linked to it

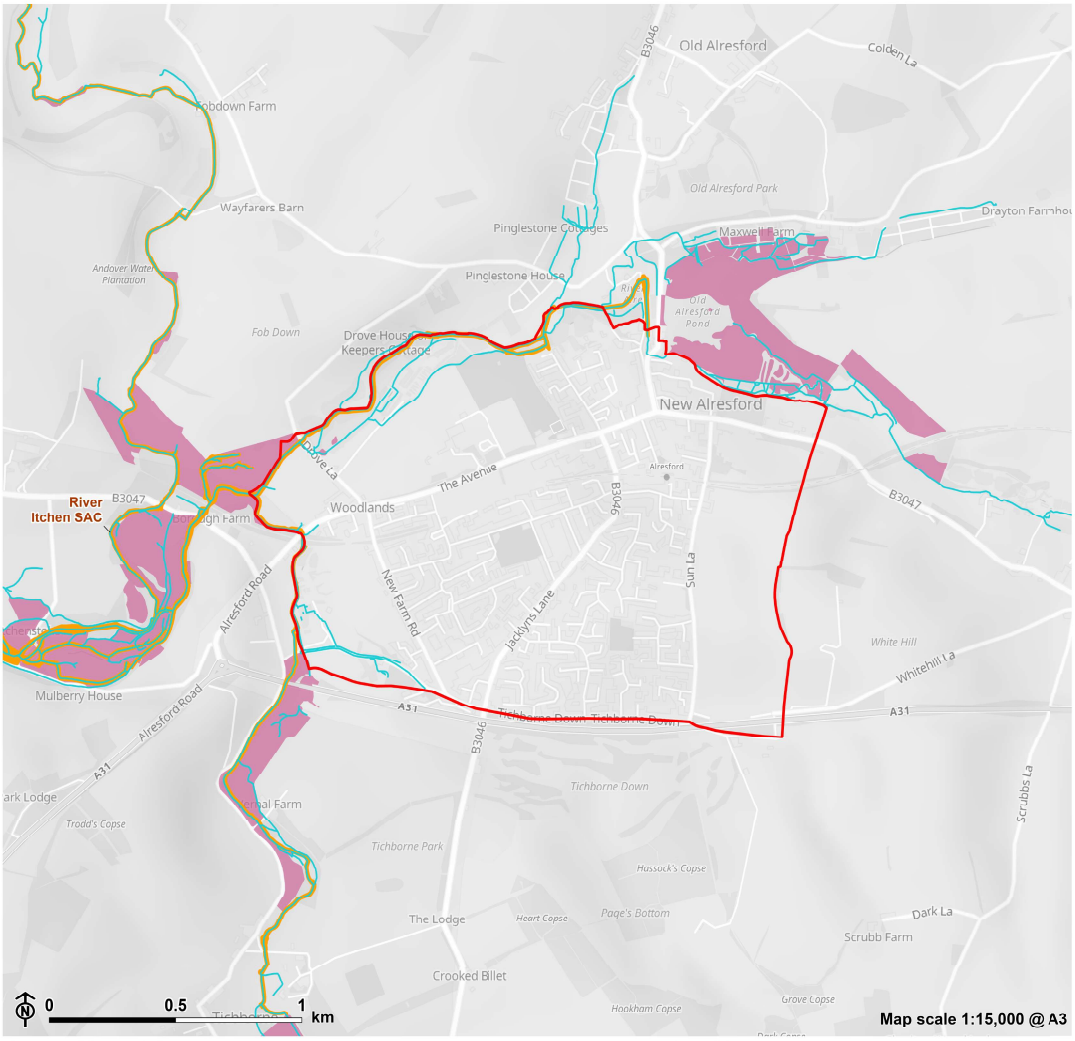

Fig3_2_RiverItchen_And_Functionally_Linked_Habitats_r0_A3L 30/10/2025

Mammals

3.14 Otters are a qualifying feature of the River Itchen SAC. Otter home ranges can occupy extensive areas and linear distances, and therefore the population of otter for which the River Itchen SAC is designated is likely to utilise, and depend upon, the availability and connectivity of suitable riparian and wetland habitat in the wider region, including smaller watercourses and field drains (see Figure 3.2). As a result, there is potential for FLL within the Plan area.

Invertebrates

3.15 Southern damselfly is a qualifying feature at River Itchen SAC. Southern damselflies have very specialised habitat requirements, making use of "shallow, well-vegetated, base-rich runnels and flushes in open areas or small side-channels of chalk rivers. Most sites are on wet heath" **[See reference** 25**]**; i.e. rivers and wet heathland immediately adjacent to them (see Figure 3.2). River Itchen SAC is within the Plan area, with habitats that support southern damselfly forming part of the SAC designation; however, there are also lowland fens around New Alresford that fall outside the SAC and could be functionally linked to it.

3.16 Atlantic stream (white clawed) crayfish are a qualifying feature of the River Itchen SAC. Crayfish make use of habitats within and immediately adjacent to the waterbodies they live in **[See reference** 26**]**. As the whole of the River Itchen is designated SAC, there are no areas of habitat outside of the SAC boundary that crayfish would need to rely on; therefore effects on FLL do not need to be considered in relation to crayfish.

Fish

3.17 Brook lamprey, Atlantic salmon and bullhead are qualifying features of the River Itchen SAC; and the SAC Compensatory Habitat (River Meon) is also designated for Atlantic salmon.

3.18 Brook lamprey and bullhead are not migratory species and therefore rely entirely on habitats within the River Itchen. As the whole of the River Itchen is designated SAC, there are no areas of habitat outside of the SAC boundary that crayfish would need to rely on; therefore, effects on FLL within the Plan area do not need to be considered in relation to brook lamprey or bullhead.

3.19 Atlantic salmon spawn, and live as juveniles, in rivers such as the Itchen and Meon and then migrate to sea. The River Itchen SAC therefore has functional links to Southampton Water and beyond, but all of the supporting habitat within the Plan area is within the SAC or the SAC Compensatory Habitat (River Meon). Therefore, effects on FLL within the Plan area do not need to be considered in relation to Atlantic salmon.

Assessment of 'likely significant effect'

3.20 As required under Regulation 105 of The Conservation of Habitats and Species Regulations 2017 **[See reference** 27**]** (as amended) (the 'Habitats Regulations'), an assessment has been undertaken of the 'likely significant effects' of the Plan. The assessment has been prepared in order to identify which policies or site allocations would be likely to have a significant effect on Habitats Sites.

3.21 Consideration has been given to the potential for the development proposed to result in significant effects associated with:

- Physical loss of/damage to habitat;
- Non-physical disturbance (noise, vibration and light);
- Non-toxic contamination;
- Air pollution;
- Recreation pressure; and
- Changes to hydrology including water quality and quantity.

3.22 A risk-based approach involving the application of the precautionary principle is adopted in the assessment, such that a conclusion of 'no significant effect' has only been reached where it is considered very unlikely, based on current knowledge and the information available, that a proposal in the Neighbourhood Plan would have a significant effect on the integrity of a Habitats Site.

Interpretation of 'likely significant effect'

3.23 Relevant case law helps to interpret when effects should be considered as a Likely Significant Effect (LSE), when carrying out HRA of a land use plan.

3.24 In the Waddenzee case **[See reference** 28**]**, the European Court of Justice ruled on the interpretation of Article 6(3) of the Habitats Directive (translated into Reg. 102 in the Habitats Regulations), including that:

> An effect should be considered 'likely', "if it cannot be excluded, on the basis of objective information, that it will have a significant effect on the site" (para 44). An effect should be considered 'significant', "if it undermines the conservation objectives" (para 48). Where a plan or project has an effect on a site "but is not likely to undermine its conservation objectives, it cannot be considered likely to have a significant effect on the site concerned" (para 47).

3.25 An opinion delivered to the Court of Justice of the European Union **[See reference** 29**]** commented that:

> "The requirement that an effect in question be 'significant' exists in order to lay down a de minimis threshold. Plans or projects that have no appreciable effect on the site are thereby excluded. If all plans or projects capable of having any effect whatsoever on the site were to be caught by Article 6(3), activities on or near the site would risk being impossible by reason of legislative overkill."

3.26 This opinion (the 'Sweetman' case) therefore allows for the authorisation of plans and projects whose possible effects, alone or in combination, can be considered 'trivial' or de minimis; referring to such cases as those "which have no appreciable effect on the site". In practice such effects could be screened out as having no Likely Significant Effect; they would be 'insignificant'.

3.27 The HRA screening assessment therefore considers whether the Neighbourhood Plan policies could have likely significant effects either alone or in combination.

In-combination effects

3.28 Regulation 105 of the Habitats Regulations 2017 requires an Appropriate Assessment where "a land use plan is likely to have a significant effect on a Habitats Site (either alone or in combination with other plans or projects) and is not directly

connected with or necessary to the management of the site". Therefore, it will be necessary to consider whether any impacts identified from the Neighbourhood Plan may combine with other plans or projects to give rise to significant effects in-combination.

3.29 Where the Neighbourhood Plan is likely to have an effect on its own e.g. due to water pollution (due to impact pathways being present), but it is not likely to be significant, the in-combination assessment at Screening stage needs to determine whether there may also be the same types of effect from other plans or projects that could combine with the Neighbourhood Plan to produce a significant effect. If so, this likely significant effect (e.g. water pollution) arising from the Neighbourhood Plan in combination with other plans or projects, would then need to be considered through the Appropriate Assessment stage to determine if water pollution would have an adverse effect on integrity of the relevant Habitats Site. Where the screening assessment has concluded that there is no impact pathway between development proposed in the Neighbourhood Plan and the conditions necessary to maintain qualifying features of a Habitats Site, then there will be no in-combination effects to assess at the Screening or Appropriate Assessment stage. This approach accords with recent guidance on HRA in the HRA Handbook **[See reference** 30**]**.

3.30 If impact pathways are found to exist for a particular effect but it is not likely to be significant from the Neighbourhood Plan alone, the in-combination assessment will identify which other plans and programmes could result in the same impact on the same Habitats Site. This will focus on planned growth (including housing, employment, transport, minerals and waste) around the affected site, or along the impact corridor, for example, if impacts could arise as a result of changes to a waterway, then planned growth in local authorities along that waterway will be considered.

3.31 The potential for in-combination impacts will therefore focus on plans prepared by local authorities that overlap with Habitats Sites that are within the scope of this HRA. The findings of any associated HRA work for those plans will be reviewed where available. Where relevant, any strategic projects in the area that could have in-combination effects with the Neighbourhood Plan will also be identified and reviewed.

3.32 The online HRA Handbook suggests the following plans and projects may be relevant to consider as part of the in-combination assessment:

- Applications lodged but not yet determined, including refusals subject to an outstanding appeal or legal challenge;
- Projects subject to periodic review e.g. annual licences, during the time that their renewal is under consideration;

- Projects authorised but not yet started’
- Projects started but not yet completed;
- Known projects that do not require external authorisation;
- Proposals in adopted plans;
- Proposals in draft plans formally published or submitted for final consultation, examination or adoption.

3.33 The need for in-combination assessment also arises at the Appropriate Assessment stage, as discussed in the Appropriate Assessment section below.

Screening assessment

3.34 The HRA Screening assessment (Appendix B and summarised in Chapter 4), considers the potential for likely significant effects resulting from each policy in the Neighbourhood Plan, and the site allocations that may contribute to each type of impact. For each policy and site allocation, the screening assessment concludes either that likely significant effects can be ruled out (no Appropriate Assessment required) or that they cannot be ruled out (Appropriate Assessment required). The screening assessment is conducted without taking mitigation (e.g. embedded in policy) into account, in accordance with the 'People over Wind' judgment.

3.35 For some types of impacts, the potential for likely significant effects has been determined on a proximity basis, using GIS data to determine the proximity of potential development locations to the Habitats Sites that are the subject of the assessment. However, there are many uncertainties associated with using set distances as there are very few standards available as a guide to how far impacts will travel. Therefore, where assumptions have been made, these are set out in Chapter 4.

Appropriate Assessment methodology

3.36 Following the screening stage, if likely significant effects on Habitats Sites are unable to be ruled out, the plan-making authority is required under Regulation 105 of the Habitats Regulations 2017 to make an ‘Appropriate Assessment’ of the implications of the plan for Habitats Sites, in view of their conservation objectives. EC Guidance **[See reference** 31**]** states that the Appropriate Assessment should consider the impacts of the plan (either alone or in combination with other projects or plans) on the integrity of Habitats Sites with respect to their conservation objectives and to their structure and function.

3.37 Unlike the Screening stage, Appropriate Assessment can take into account mitigation, for example as proposed within Neighbourhood Plan policies.

Assessing the effects on site integrity

3.38 A site's integrity depends on it being able to sustain its 'qualifying features' (i.e. the habitats and species for which it has been designated) and to ensure their continued viability. The Holohan judgement also clarifies that the effects on species and habitats not listed as qualifying features, but which could result in secondary effects upon the qualifying features of Habitats Sites also need to be considered. The Appropriate Assessment, if required, will refer the information set out in Appendix A of this report, to consider the characteristics of supporting habitats and species that could be affected by impacts identified at the screening stage.

3.39 A high degree of integrity at a site is considered to exist where the potential to meet a site's conservation objectives is realised and where the site is capable of self-repair and renewal with a minimum of external management support.

3.40 A conclusion needs to be reached as to whether or not the Neighbourhood Plan would adversely affect the integrity of a Habitats Site. Assessing the effects on the site(s) integrity involves considering whether the predicted impacts of the Neighbourhood Plan policies and/or sites (either alone or in combination) have the potential to:

- Cause delays to the achievement of conservation objectives for the site.
- Interrupt progress towards the achievement of conservation objectives for the site.
- Disrupt those factors that help to maintain the favourable conditions of the site.
- Interfere with the balance, distribution and density of key species that are the indicators of the favourable condition of the site.
- Cause changes to the vital defining aspects (e.g. nutrient balance) that determine how the site functions as a habitat or ecosystem.
- Change the dynamics of relationships that define the structure or function of the site (e.g. relationships between soil and water, or animals and plants).
- Interfere with anticipated natural changes to the site.
- Reduce the extent of key habitats or the population of key species.
- Reduce the diversity of the site.

- Result in disturbance that could affect the population, density or balance between key species.
- Result in fragmentation.
- Result in the loss of key features.

3.41 The conservation objectives for each Habitats Site (Appendix A) are generally to maintain the qualifying features in favourable condition. Natural England does not define conservation objectives for SAC Compensatory Habitats or Ramsar sites but these can often be inferred from those for co-located SAC or SPA features. The Site Improvement Plans for each site provide a high level overview of the issues (both current and predicted) affecting the condition of the designated features on the site(s) and outline the priority measures required to improve the condition of the features. An Appropriate Assessment draws on these to help to understand what is needed to maintain the integrity of the Habitats Sites.

3.42 For each Habitats Site where an uncertain or likely significant effect is identified in relation to the Neighbourhood Plan, the potential impacts will be set out and judgements made (based on the information available) regarding whether the impact will have an adverse effect on the integrity of the site. A further in-combination assessment will need to be carried out for any likely significant effects identified where following Appropriate Assessment it is considered that the Neighbourhood Plan will not on its own adversely affect the integrity of the Habitats Site. This will be undertaken in the same way as described above under the Screening stage drawing on information regarding the same types of relevant plans or projects referred to above. Consideration will be given to the potential for mitigation measures to be implemented that could reduce the likelihood or severity of the potential impacts such that there would not be an adverse effect on the integrity of the site.

Chapter 4
HRA Screening

4.1 The HRA screening of the Neighbourhood Plan has determined that Appropriate Assessment is required, as likely significant effects from the plan's policies cannot be ruled out through screening. The reasoning for this is presented below.

4.2 Appendix B sets out the screening of all of the policies and site options in the Neighbourhood Plan, and this chapter summarises the findings of that process. The following policies and all of the site options have been screened in:

- Policy: Community Facilities – permits new, expanded or improved community facilities.
- Policy: Employment – permits expansion and intensification of employment uses within safeguarded areas, and small scale workspaces (e.g. live work) elsewhere.
- Policy: Housing Strategy – this policy defines the total quantum of housing development in New Alresford (608, including 100 in the Neighbourhood Plan).
- Policy: Sustainable Tourism / Visitor Economy – permits new or enhanced visitor or tourism facilities including accommodation.

Physical damage and loss of habitat

4.3 Any development resulting from the Neighbourhood Plan would take place within the Plan area; therefore only Habitats Sites (or FLL) within the Neighbourhood Plan area could be affected through physical damage or loss of habitat. The River Itchen SAC is within the Plan area and there may be FLL used by otters or southern damselfly from the SAC, within the plan area (e.g. wetland habitats). Development occurring within or immediately adjacent to the SAC or its FLL could have a likely significant effect due to physical damage or loss of habitat.

4.4 None of the site options are within a Habitats Site, however, site NA07 is immediately adjacent to the River Itchen SAC. None of the site options are within/adjacent to likely FLL (e.g. mapped lowland fen / chalk stream habitat), but there may be unmapped FLL at any of the greenfield sites (NA01, NA06, NA07, NA09). These allocations are associated with Policy: Housing Strategy.

4.5 In addition, some of the plan's policies permit development in locations other than allocated sites and could therefore, in theory, permit development immediately adjacent to the SAC or within / adjacent to FLL. Development coming forward due to these policies is likely to be within the settlement boundary, as defined within Policy: New Alresford Settlement Boundary which includes the existing northern edge of the town adjacent to the River Itchen, and greenfield areas to the east of the town. Policies permitting development outside the allocated sites are:

- Policy: Community Facilities;
- Policy: Employment; and
- Policy: Sustainable Tourism / Visitor Economy.

4.6 There is the potential for likely significant effects to occur in relation to physical damage and loss of habitat at River Itchen SAC or its FLL. This therefore requires further consideration at the Appropriate Assessment stage.

Non-physical disturbance

4.7 Noise and vibration effects, e.g. during the construction of new housing or employment development, are most likely to disturb bird species and are thus a key consideration with respect to Habitats Sites where birds are the qualifying features. Artificial lighting at night (e.g. from street lamps, flood lighting and security lights) has the potential to affect species where it occurs in close proximity to their habitats.

4.8 It has been assumed (on a precautionary basis and based on our experience of previous HRAs and consultation with Natural England) that the effects of noise, vibration and light pollution are capable of causing an adverse effect if development takes place within 500 metres of a Habitats Site with qualifying features sensitive to these disturbances.

4.9 The River Itchen SAC (and its FLL) supports qualifying species that are sensitive to non-physical disturbance.

4.10 All of the site options are within 500m of the SAC (and FLL). These allocations are associated with Policy: Housing Strategy.

4.11 In addition, policies permitting development outside of allocated sites (see paragraph 4.5) could result in development within 500m of the SAC or its FLL.

4.12 There is the potential for likely significant effects to occur in relation to non-physical disturbance at River Itchen SAC or its FLL. This therefore requires further consideration at Appropriate Assessment.

Air pollution

4.13 Air pollution is most likely to affect Habitats Sites where plant, soil and water habitats are the qualifying features, but some qualifying animal species may also be affected, either directly or indirectly, by deterioration in habitat as a result of air pollution. Deposition of pollutants to the ground and vegetation can alter the characteristics of the soil, affecting the pH and nitrogen levels, which can then affect plant health, productivity and species composition.

4.14 In terms of vehicle traffic, nitrogen oxides (NOx, i.e. NO and NO2) are considered to be the key pollutants, although ammonia can also arise from vehicle emissions. Deposition of nitrogen compounds may lead to both soil and freshwater acidification, and NOx can cause eutrophication of soils and water.

4.15 Based on the Highways Agency Design Manual for Road and Bridges (DMRB) guidance document LA105 Air Quality **[See reference** 32**]** (which was produced to provide advice regarding the design, assessment and operation of trunk roads including motorways), it is assumed that air pollution from roads is unlikely to be significant beyond 200m from the road itself. Where increases in traffic volumes are forecast, this 200m buffer needs to be applied to the relevant roads in order to make a judgement about the likely geographical extent of air pollution impacts.

4.16 The DMRB Guidance for the assessment of local air quality in relation to highways developments provides criteria that should be applied at the Screening Stage of an assessment of a plan or project, to ascertain whether there are likely to be significant impacts associated with routes or corridors. Based on the DMRB guidance, affected roads which should be assessed are those where:

- Daily traffic flows will change by 1,000 AADT (Annual Average Daily Traffic) or more; or
- Heavy duty vehicle (HDV) flows will change by 200 AADT or more; or
- A change in speed band; or
- Road alignment will change by 5m or more.

4.17 The Winchester Local Plan HRA identified the following roads within 10km of the New Alresford Neighbourhood Plan area and within 200m of a sensitive Habitats Site, and modelled traffic flows and changes in air pollution on them:

- M3 at Abbots Worthy, past River Itchen SAC;
- A34 Winchester Bypass, part River Itchen SAC;
- A33 & M3 at West Stratton, past SAC Compensatory Habitat (River Dever); and
- A32 alongside SAC Compensatory Habitat (River Meon).

4.18 The Neighbourhood Plan could contribute to traffic on these roads due to all of its site options and the policies that have been screened in, i.e.:

- Policy: Community Facilities;
- Policy: Employment;
- Policy: Housing Strategy; and
- Policy: Sustainable Tourism / Visitor Economy.

4.19 However, the quantum of development proposed by the Neighbourhood Plan is in line with that proposed for the New Alresford area in the Winchester Local Plan. The HRA of the Local Plan concluded that there would be no adverse effects on the integrity of any Habitats Sites due to air pollution. There are no additional likely significant effects due to the Neighbourhood Plan; therefore this impact pathway is screened out.

Changes in water quality / quantity

4.20 An increase in demand for water abstraction and treatment, and changes in land use resulting from the growth proposed in the Neighbourhood Plan could result in changes in hydrology at Habitats Sites. Depending on the qualifying features and particular vulnerabilities of the Habitats Sites, this could result in likely significant effects; for example due to changes in environmental or biotic conditions, water chemistry and the extent and distribution of preferred habitat conditions.

4.21 Habitats can also be affected by changes in water quality such as nutrient enrichment, changes in salinity, smothering from dust, and run-off, discharge or spillage from industry, agriculture or construction. Changes in water abstraction, discharge and land use can also affect water quality, for example a change in land

use from agriculture to residential reduces direct nutrient run-off to watercourses but increases the volume of nutrients discharges from wastewater treatment works.

4.22 Habitats Sites with potential to be affected by changes in water quantity or quality are likely to be sites (or their FLL) that lie within the Plan area or those that are hydrologically connected to areas of development provided for by the plan, i.e. the River Itchen SAC and its FLL or the SAC Compensatory Habitat (River Meon).

Direct pollution

4.23 Development could result in direct pollution that has a significant impact if it is adjacent to or upstream of a Habitats Site (River Itchen SAC) or functionally linked land (otters and southern damselflies). Pollution of groundwater could also affect the River Itchen SAC due to hydrological connectivity with the chalk aquifer.

4.24 Site option NA07 is adjacent to the River Itchen SAC and NA01, NA04, NA06, NA09 may be hydrologically connect to it, as they are within 500m and sightly uphill of the SAC. None of the site options are adjacent to likely FLL (mapped lowland fen / chalk stream habitat), but there may be unmapped FLL at any of the greenfield sites (NA01, NA06, NA07, NA09).

4.25 In addition, policies permitting development outside of allocated sites (see paragraph 4.5) could result in development within 500m of the SAC or its FLL.

4.26 There is the potential for likely significant effects to occur in relation to direct pollution at River Itchen SAC or its FLL. This therefore requires further consideration at the Appropriate Assessment stage.

Abstraction

4.27 Southern Water's Water Resource Management Plan states that South Hampshire takes one third of its water from groundwater and two thirds from the River Test and River Itchen. The major chalk aquifer underlies the plan area and is also connected to the River Itchen SAC. Abstraction from groundwater, or directly from the river, could therefore affect this site.

4.28 The Neighbourhood Plan could contribute increased demand for water supply due to all of its site options and the policies that have been screened in, i.e.:

- Policy: Community Facilities;

- Policy: Employment;
- Policy: Housing Strategy; and
- Policy: Sustainable Tourism / Visitor Economy.

4.29 However, the quantum of development proposed by the Neighbourhood Plan is in line with that proposed for the New Alresford area in the Winchester Local Plan. The HRA of the Local Plan concluded that there would be no adverse effects on the integrity of any Habitats Sites due to abstraction. There are no additional likely significant effects due to the Neighbourhood Plan; therefore this impact pathway is screened out.

Wastewater

4.30 Wastewater treatment works serving the plan area fall within Southern Water's 'Test and Itchen Catchment' planning area **[See reference** 33**]**, and the wastewater treatment works at New Alresford discharges into the Itchen catchment.

4.31 The River Itchen catchment is sensitive to nutrient enrichment (nitrogen and phosphorus) and Natural England have identified as a catchment within which 'nutrient neutrality' must be demonstrated.

4.32 The Neighbourhood Plan could contribute to increased demand for wastewater treatment due to all of its site options and the policies that have been screened in, i.e.:

- Policy: Community Facilities;
- Policy: Employment;
- Policy: Housing Strategy; and
- Policy: Sustainable Tourism / Visitor Economy.

4.33 However, the quantum of development proposed by the Neighbourhood Plan is in line with that proposed for the New Alresford area in the Winchester Local Plan. The HRA of the Local Plan concluded that there would be no adverse effects on the integrity of any Habitats Sites due to wastewater treatment.

4.34 There are no additional likely significant effects due to the Neighbourhood Plan; however, as this conclusion in the Winchester Local Plan was made on the basis of mitigation within Local Plan policies, this impact is screened in (so that the mitigation can be taken into account in the Appropriate Assessment).

Chapter 5
Appropriate Assessment

5.1 The HRA Screening (Chapter 4 and Appendix B) was able to rule out likely significant effects in relation to:

- Air pollution, and
- Changes in water quality / quantity (abstraction).

5.2 However, likely significant effects could not be ruled out in relation to the following, which are assessed further in the Appropriate Assessment, below:

- Physical damage and loss of habitat – River Itchen SAC and its FLL.
- Non-physical disturbance – River Itchen SAC and its FLL.
- Changes in water quality / quantity (direct pollution) – River Itchen SAC and its FLL.
- Changes in water quality / quantity (wastewater)- River Itchen SAC.

Physical damage and loss of habitat

5.3 The risks to the River Itchen SAC and its functionally linked habitats, from damage or loss of habitat, relate to the following:

- NA07, which is immediately adjacent to the River Itchen SAC;
- The potential for the greenfield sites (NA01, NA06, NA07, NA09) to support habitats that are functionally linked to the SAC; and
- The possibility that other development could occur outside of the site options but adjacent to the SAC or within FLL.

5.4 The main policy protections to avoid adverse effects on the integrity of the SAC are within the Winchester Local Plan. ‘Policy NE1: Protecting and enhancing biodiversity and the natural environment in the district’ and ‘Policy NE5: Biodiversity’ provide the principal safeguards. Relevant excerpts are provided below:

Policy NE1: Protecting and enhancing biodiversity and the natural environment in the district

Development will only be permitted where it demonstrates that it will protect and enhance the natural environment and biodiversity including the natural beauty of the landscape, all natural resources, habitats and species; and

i. Avoids significant harm to the natural environment, biodiversity and geodiversity or can adequately mitigate any harm arising and can clearly demonstrate that there will be no adverse impact on the conservation status of key species, internationally protected sites, nationally protected designated sites, or locally designated sites and there will be no net loss or deterioration of a key habitat type including irreplaceable habitats and the integrity of linkages between designated sites and key habitats;

ii. Safeguards features of the natural environment and nature conservation interest and makes nature based solutions part of the plans to tackle the climate emergency. These should include measures to retain, conserve and enhance habitats, including, internationally, nationally and locally designated sites, priority habitats, networks of ecological interest, ancient woodland, water features, hedgerows and wetland pastures as corridors and stepping- stones for wildlife;

iii. Does not harm/degrade the Ecological Network or result in its fragmentation;

iv. Development which would result in the loss or deterioration of irreplaceable habitats, including ancient woodland and ancient or veteran trees, will only be permitted in exceptional circumstances where the public benefit would clearly outweigh the loss or deterioration and where a suitable compensation strategy exists;

v. Normally any mitigation, compensation and enhancement measures are required to be delivered on-site, unless special circumstances dictate that off-site mitigation or compensation is more appropriate. A financial contribution - in lieu of on-site mitigation - will only be considered in limited circumstances and where it is demonstrated that the proposed mitigation is deliverable and effective; and

vi. Protects, conserves and enhances the air and water environments in the district.

5.5 and:

Policy NE5: Biodiversity

The Local Planning Authority will require, in accordance with the Environment Act 2022, development to deliver a minimum of 10% measurable net gain in biodiversity to be maintained for a period of 30 years in accordance with the Environment Act and latest DEFRA Biodiversity Metric; and

i. Protects sites of international, and national importance, and local nature conservation sites and SINCS, from inappropriate development;

ii. Supports habitats that are important to maintain the integrity of Habitats sites;

iii. Supports the delivery of nature-based solutions as part of the development proposals and shows how biodiversity can be retained, protected and enhanced through its design and implementation, for example by designing for wildlife, delivering measurable BNG and BAP targets and enhancing Biodiversity Opportunity Areas, Local Ecological Networks/Local Nature Recovery Areas, Local Nature Recovery Network and include a management plan for a period of 30 years;

iv. New development will be required to avoid adverse impacts, or if unavoidable ensure that impacts are appropriately mitigated, including impacts on functionally linked land. Developments within 500 metres of a Habitats Site or its FLL should produce a Construction Environmental Management Plan (CEMP) to address potential impacts to these habitats during the construction phase.

v. Mitigates the effects of recreational pressure on Habitats Sites in line with Bird Aware Solent and the New Forest Recreational Management Strategy where appropriate, or an agreed approach with Natural England;

vi. Development proposals will only be supported if the benefits of the development clearly outweigh the harm to the habitat and/or species; with compensation measures used only as a last resort. However, in line with the Habitats Regulations, adverse effects on the integrity of Habitats Sites must be avoided; compensation will not be appropriate where there is harm to the habitats or species of a Habitats Site; […]

5.6 In addition to the safeguards within the Winchester Local Plan, the Neighbourhood Plan provides the following mitigation:

- Policy: Green and Blue Infrastructure – this policy seeks to safeguard green infrastructure including water courses and woodland, which would contribute to mitigation against loss of habitat.
- Policy: Local Green Spaces – this policy seeks to safeguard Local Green Spaces and, as such, may contribute to mitigation against loss of habitat.

5.7 These policies are considered sufficient to ensure that development in or adjacent to the SAC or its FLL would either not be permitted or would be required to demonstrate sufficient mitigation to avoid adverse effects on the integrity of the SAC, due to physical damage or loss of habitats.

5.8 Therefore, there will be no adverse effects on the integrity of the River Itchen SAC due to physical damage and loss of habitat (directly, or via FLL).

Non-physical disturbance

5.9 The risks to the River Itchen SAC and its functionally linked habitats, from non-physical disturbance, relate to the following:

- All of the site options, which are within 500m of the SAC and potential FLL.
- The possibility that other development could occur outside of the site options but within 500m of the SAC or within FLL.

5.10 As with effects relating to physical damage and loss of habitat, Policies NE1 and NE5 provide the main general protection of the Habitats Sites.

5.11 Policy NE5 makes specific reference to the potential for impacts from non-physical disturbance on birds using FLL and requires developments within 500m of a Habitats Site or FLL to produce a Construction Environmental Management Plan (CEMP). The supporting text of NE5 explains that risks to FLL include non physical disturbance such as light, noise and vibration:

> "FLL maintains and restores a protected population such as birds and bats at the favourable conservation status. Non-physical disturbance such noise and vibration during the construction of new housing and artificial light at night can cause adverse effects on protected populations therefore it must be demonstrated that these are avoided where possible."

5.12 Additional protection is provided by the following policies:

- Policy NE8: South Downs National Park requires development in close proximity to the National Park (and therefore River Itchen SAC) to follow dark skies guidance on lighting.
- Policy NE14: Rural character: States that development in rural areas must not have an unacceptable impact e.g. from lighting or noise. Developments must demonstrate that opportunities to reduce light pollution have followed mitigation hierarchy.

5.13 These policies provide sufficient safeguards. Therefore, there will be no adverse effects on the integrity of the River Itchen SAC due to non-physical disturbance (directly, or via FLL).

Changes in water quality / quantity – direct pollution

5.14 The risks to the River Itchen SAC and its functionally linked habitats, from direct pollution, relate to the following:

- NA07, which is immediately adjacent to the River Itchen SAC;
- The potential for NA01, NA04, NA06, NA09 to be hydrologically connected to the SAC;
- The potential for the greenfield sites (NA01, NA06, NA07, NA09) to support habitats that are functionally linked to the SAC; and
- The possibility that other development could occur outside of the site options but adjacent to the SAC or within FLL.

5.15 General protection for Habitats Sites and their FLL is provided by the policies identified in relation to 'physical damage and loss of habitat' (Local Plan policies NE1 and NE5). Policy NE5 also requires developments within 500m of a Habitats Site or its FLL to prepare a CEMP, which provides additional pollution control safeguards for those developments closest to the river Habitats Sites. Other policies in the Local Plan provide further protection for water quality, as set out below.

5.16 The River Itchen SAC is linked to the aquifers, therefore measures which protect groundwater will also indirectly protect the water quality of the SAC. The requirement for sustainable drainage (SuDS), which includes measures for pollution control in surface water drainage, is within Policy NE6. Relevant excerpts from the policy are below:

Policy NE6: Flooding, Flood Risk and the Water Environment

The local planning authority will permit development provided it avoids flood risk to people and property and complies with the following:

[…]

v. Includes sustainable water management systems such as Sustainable Drainage Systems (SuDS) which must be considered at the outset and should be designed to meet the relevant standards and accompanied by a management plan for the lifetime of the development;

[…]

viii. Prioritise and explore the opportunities for Natural Flood Management for all proposals in areas at risk of flooding for the lifetime of the development before any hard engineering flood defences or water attenuation measures are proposed. These should be designed to maximise the benefit to flood risk management, water quality, biodiversity, and amenity to provide attenuation and biodiversity enhancement.

ix. For major new build development, the presumption should be for the inclusion of above ground features including green roofs/walls, rain gardens, bio-retention areas and swales, and features that provide multi-functional uses to maximise benefit to flood risk management, water quality, biodiversity, and amenity to provide attenuation and biodiversity enhancement. All other developments should at least demonstrate that they have considered such measures.

To account for a changing climate, all drainage systems must be designed to accommodate the requirements of the development site for the lifetime of the development and demonstrate that they are able to function during extreme rainfall events. This should include consideration of likely overland flow paths in the event that drainage systems are overwhelmed or blocked.

The local planning authority will support the development or expansion of water supply, surface water drainage and wastewater treatment facilities including natural flood management schemes. There will be cases where they are needed to serve existing or new development or in the interests of securing long term supply, provided that the need for such facilities is consistent with other policies such as the development strategy, flood risk, contamination and protection of the historic, natural and built environment and water supply.

If there is an overriding reason why SuDS is not achievable this must be evidenced with justification for the alternative approach being taken. Surface water will not be permitted to connect to the foul drainage network.

The local planning authority will support the opening up of culverted watercourses as part of the design process to support ecological and biodiversity improvements, where this has been demonstrated that it is feasible and safe to do so.

5.17 Measures that apply to development that could affect rivers/watercourses are within Policy NE17. Relevant excerpts are:

Policy NE17: Rivers, Watercourses and their settings

Development proposals that affect rivers, watercourses or their settings will be permitted where they conserve and enhance the following;

i. Water quality and quantity, and help achieve requirements of the Water Framework Directive and Habitats Regulations or their replacement, in the case of the River Itchen SAC and Upper Hamble (Solent Maritime SAC, and Solent & Southampton Water SPA/Ramsar), and habitats relied upon as identified in the Solent Wader and Brent Goose Strategy (SWBGS);

ii. Ability of groundwater, surface water features and watercourse corridors to function as natural flood management areas by natural processes throughout seasonal variations, within the immediate vicinity, and both upstream and downstream of the site of the proposal including for flood risk management purposes; and specifically for surface water features and watercourse corridors;

iii. Increasing biodiversity;

iv. Character, appearance and setting;

v. Public access to and along the waterway for recreational opportunities and the importance of providing canopy shading for both the natural water environment and for people walking beside the waterway;

vi. Include measures to eliminate risk of pollution to groundwater, surface water and watercourse corridor features which would harm their ecological and/or chemical status. […]

5.18 Additional measures specific to contaminated development sites are contained within Policy D8. Relevant excerpts are:

Policy D8: Contaminated Land

The development of land which is known or suspected to be contaminated, or which is likely to be affected by contamination in the vicinity, will only be permitted where it accords with the Development Plan and there will be no unacceptable impacts on human health, groundwater and surface water, or the wider environment, and:

[…]

ii. Appropriate remedial measures are included to prevent risk to future users of the site, the surrounding area and the environment (including water supplies and aquifers);"

" 5.89 It is not only essential that development does not directly cause contamination, but also to ensure that it does not establish pathways between potential sources of contamination and "receptors" (i.e. people, the environment or property) that may be impacted by its effects."

5.19 In addition to the safeguards within the Winchester Local Plan, the Neighbourhood Plan provides the following:

- Policy: Green and Blue Infrastructure – this policy refers to the need for sustainable drainage systems, which would contribute to mitigation against water pollution.

5.20 These policies provide sufficient safeguards. Therefore there will be no adverse effects on the integrity of the River Itchen SAC due to direct pollution (directly, or via FLL).

Changes in water quality / quantity - wastewater

5.21 The risks to the River Itchen SAC and its functionally linked habitats, from wastewater, relate to the increase in nitrogen and phosphorus to the River Itchen catchment that could occur from any new residential or overnight tourism development.

5.22 All developments that result in new overnight accommodation within the Itchen catchment (and the whole Local Plan area) are required to achieve nutrient neutrality,

in line with Natural England's requirements for mitigation, and as set out in Local Plan Policy NE16:

> ### Policy NE16: Nutrient Neutrality; water quality effects on the Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar sites of the Solent and the River Itchen
>
> i) Planning permission will only be granted where the integrity of nationally protected sites is not adversely affected by new development. When making planning decisions which may affect these sites the requirements of the Habitat Regulations will be met including the carrying out appropriate assessments." And
>
> "ii) When assessing applications for development the impacts of increased nutrients from these sites will be considered. Permission will be granted only where effects can either be excluded or, if that is not possible, mitigation by nutrient neutrality is achieved following the guidance provided by Natural England thereby avoiding any adverse impact upon the quality of the water environment of the sites.
>
> iii) Development proposals for mitigation schemes such as tree planting or wetlands will be supported where they are located in appropriate areas in relation to the development they are to serve, make a positive contribution to the Local Nature Recovery Network, and the nature of the mitigation would not have adverse impacts on the character, function and appearance of the area in which they are to be located.

5.23 Its supporting text provides further detail:

> "The council has for some time needed to consider the impacts of nitrogen and phosphorus in the wastewater produced by 'overnight' development across the district on nationally protected sites including the Solent SAC and River Itchen SAC. Overnight development requires the provision of new connections to the foul draining network. As a result this can increase the amount of sewage effluent at waste water treatment works, which may have a cumulative impact on protected habitats with other sources of nitrogen and phosphorus. One approach supported by Natural England which can allow development to proceed is to achieve 'nutrient neutrality'. It allows development to be permitted if can be demonstrated that there will be no net increase in nutrient loading in the catchments of the affected nationally protected sites.

The council needs to consider the impacts of nitrogen on the Solent SAC which covers sites in the south of the district. The issues with phosphorus draining into the catchment for the River Itchen covers a significant part of the district including areas to the north and east of Winchester and Natural England advises that phosphorus and nitrogen are causing adverse environmental effects on the quality of the river which is a Special Area for Conservation (SAC).

The council received new guidance from Natural England which will affect the way that the council has to assess new overnight development across the whole district in terms of calculating the impact caused by the waste water they produce. All new overnight development which is likely to have a significant effect on designated sites through increased waste water production will need to produce a nutrient budget. Natural England have produced a Nutrient Budget Calculator alongside guidance on achieving nutrient neutrality. It should be noted that the nutrient budgets have been undertaken for all sites allocated in the Plan and is set out in the Plan Habitats Regulations Assessment.

There are a number of strategic mitigation sites that have been brought forward over the few years by landowners both in the district and neighbouring areas. Developers can acquire nutrient credits from these land owners, which equate to and 'offset' the amount of mitigation required for a development, to ensure that any adverse impact upon the quality of the water environment of protected sites is avoided. The Council have produced a Nutrient Topic Paper, which sets out the supply of nutrient mitigation, including the Council's own mitigation schemes.

The Local Plan may be able to help by allocating land for use in mitigation which could include using nature based solutions such as planting woodland or creating wetland habitat in appropriate locations."

5.24 The requirement to demonstrate nutrient neutrality via contribution to strategic mitigation (or on site) provide sufficient safeguards. Therefore there will be no adverse effects on the integrity of the River Itchen SAC due to wastewater.

Chapter 6
Conclusions

6.1 The HRA Screening identified likely significant effects due to the Neighbourhood Plan in relation to: physical damage and loss of habitat, non-physical disturbance, direct pollution, and wastewater.

6.2 However, with safeguards within the Winchester Local Plan policies and Neighbourhood Plan policies taken into account, the Appropriate Assessment concluded that there will be no adverse effects on the integrity of any Habitats Site, directly or via FLL, due to the New Alresford Neighbourhood Plan.

6.3 Although there are not expected to be adverse effects on integrity, development proposals in some locations may require more evidence to demonstrate that they are avoiding harm to the River Itchen SAC than other locations. For example, site option NA07 is immediately adjacent to the River Itchen SAC and may be more likely to require detailed ecological surveys and demonstrate good practice environmental controls within a planning application than development further from the river (e.g. NA02 or NA08). This does not prevent the Habitats Regulations from being met, however, and no recommendations need to be incorporated into the Neighbourhood Plan.

LUC

December 2025

Appendix A
Attributes of Habitats Sites scoped into the HRA

River Itchen SAC

Site description

A.1 The River Itchen is one of the `classic` chalk rivers of southern England, drawing most of its character from this geological stratum. The Itchen supports an abundant and exceptionally species rich aquatic flora. It has a primary notification for its river habitat, at SSSI level (chalk river type) and also under Habitats Directive Annex I (Code H3260, watercourses with *Ranunculion* and *Batrachion* vegetation). This habitat notification comprises the river channel, its banks and parts of its riparian zone. In addition, parts of the floodplain are notified for their wetland habitat, and the river discharges via Southampton Water into the Solent which has a range of habitat designations.

Qualifying features

- H3260 Water courses of plain to montane levels with the *Ranunculion fluitantis* and *Callitricho-Batrachion* vegetation
- S1044 Southern damselfly *Coenagrion mercuriale*
- S1163 Bullhead *Cottus gobio*
- S1092 White-clawed (or Atlantic stream) crayfish *Austropotamobius pallipes*
- S1096 Brook lamprey *Lampetra planeri*
- S1106 Atlantic salmon *Salmo salar*
- S1355 Otter *Lutra lutra*

Conservation objectives:

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 and habitats of qualifying species;
- The structure and function (including typical species) of qualifying natural habitats;
- The structure and function of the habitats of qualifying species;
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely;
- The populations of qualifying species; and
- The distribution of qualifying species within the site.

Key vulnerabilities

A.2 Water pollution:

- The Diffuse Water Pollution Plan identifies numerous issues with water quality, in addition to point sources from Waste Water Treatment Works. The Plan is a critical document to achieve favourable condition, and action-owners were consulted as part of the process of revising the plan. Pollution causes excessive algal growth, smothering macrophytes, and increased BOD, decreasing oxygen availability for spawning gravels used by salmon and trout.
- Reducing road run off can build on the existing Environment Agency and Highways Agency project assessing priority outfalls and use existing Memorandum of Understanding to highlight any known issues with trunk roads for potential remedial funding.
- Work is needed with the Environment Agency to quantify any impacts. Possible role for Test and Itchen Catchment Partnership (TICP) through the Catchment Action Plan, to focus on non-trunk roads with Hampshire County Council. Environment Agency (EA) Review of Consents (RoC) process has been completed, but phosphate standards used conform to previous Common Standards Monitoring (CSM) guidance (used for setting SSSI and SAC targets). There is a risk of permitting several years of non-compliance from affected discharges. Revised CSM targets may impact on all discharges.

A.3 Physical modification:

- A range of physical modifications affect the Annex I river habitat, which have adverse consequences for characteristic biological communities of the habitat including specifically notified species. Modifications include weirs and other in-channel structures causing impoundment, siltation and interruptions to biological

movements, over-deepening, over-widening and straightening of channels, and bank re-sectioning and reinforcement.

A.4 Siltation:

- Siltation resulting from a variety of factors (direct inputs of silt into the system from land use, runoff from diffuse sources, deposition arising from impoundments and overwide channels) is a widespread problem affecting the Annex I river habitat, with consequences for macrophytes, southern damselfly habitat (where in ditches) and spawning gravels for fish.

A.5 Overgrazing:

- Impacts of over-grazing on river banks and wet meadow systems, removing riparian and meadow habitat and causing runoff into watercourses.

A.6 Water abstraction:

- Abstraction modifies the natural flow regime on which the Annex I river habitat depends for its proper functioning. Impacts may occur on habitat character and habitat extent, within the channel or in riparian wetland areas. All parts of the flow regime may be affected but low-to-intermediate flows are most likely to be significantly impacted. Abstraction should not impact on floodplain SAC features such as southern damselfly, as well as riverine features such as salmon. Effects on the habitat can have various effects on individual notified species. Activities outside of the SAC may also have detrimental impacts on site features and habitats. Natural England does not endorse any particular solution at this time.

A.7 Inappropriate weed control:

- Management of aquatic weed for fishery activities affects protected habitats e.g. *Ranunculus*. This is activity is currently exempted under the OLDs list (Operations Likely to Damage), and the extent and level of impacts on the watercourse is not conclusively known.

A.8 Hydrological changes:

- Some locations on the floodplains are too dry, with reasons not clear - impacts on ditches (decreased flowing water) for southern damselfly and meadow flora.

A.9 Inappropriate water levels:

- Water levels are not appropriate. The Water Level Management Plan (Natural England with Environment Agency) agreed options to re-wet the floodplain, benefitting flora and connecting habitat for southern damselfly. These need re-appraisal and implementation where possible.

A.10 Change in land management:

- Risk of non-compliance with HLS agreements may be affecting water quality of the river and floodplain carriers.

A.11 Inappropriate cutting/mowing:

- There are some instances of inappropriate management of riverbanks, which impacts on marginal habitat, with consequences for riparian and in-channel biota. These affect the biota using the riparian zone directly, and the biota of the river channel in terms of reducing bankside cover and enhancing silt inputs. Better bankside management can help prevent runoff from adjacent fields into the river, protecting water quality.

A.12 Invasive species:

- The presence of signal crayfish in parts of the catchment is suspected posing a significant risk to the white-clawed crayfish population through crayfish plague. However, white-clawed crayfish populations are fragmented, and therefore direct impacts from signals are suspected not to be significant. Also, there are widespread issues with Himalayan and orange balsam along the riparian corridor but the extent of the problem is unknown.

A.13 Undergrazing:

- Undergrazing impacts on wet meadow systems, causing degradation of southern damselfly habitat in particular. Bridges are required to access and manage sites and prevent SAC condition to deteriorate. This requires special project funding, which is currently prohibited in HLS agreements.

A.14 Inappropriate ditch management:

- Some ditches are not managed, leading to reed encroachment, reducing flow and therefore prohibiting southern damselfly breeding habitat.

A.15 Inappropriate scrub control:

- Inappropriate scrub control impacts particularly around ditches for southern damselfly, where scrub shades some ditches, preventing growth of marginal plants for egg-laying, and reduce flow in ditches.

A.16 Forestry and woodland management:

- Some parts of channel are excessively shaded by wet woodland, impacting on the macrophyte community. The River Restoration Strategy identifies some stretches where excessive shading is causing a problem, but it is important to

look at whole catchment, and assess against all SAC features when reviewing locations/actions. Some stretches may benefit from tree planting to reduce water temperatures.

Non-qualifying habitats and species upon which the qualifying habitats and/or species depend

Natural England's Conservation Objectives: Supplementary Advice for this site **[See reference** 34**]** identifies the following dependencies:

- The Itchen is mainly spring-fed and has only a narrow range of seasonal variation in physical and chemical characteristics. The water is of high quality, being naturally base-rich and of great clarity; and its temperature is relatively constant, with dissolved oxygen levels at or near saturation. The majority of species are present throughout the system and downstream changes are less than in most other rivers. The river provides good water quality, extensive beds of submerged plants that act as a refuge for fish species, and coarse sediments that are vital for spawning and juvenile development.
- The Itchen valley contains areas of fen, swamp and meadow supporting vegetation with diverse plant communities, some typically species-rich. Water courses, including meadow ditches, base-rich runnels and flushes in open areas, and small side- channels. The diverse and stable habitat conditions support the qualifying species.
- The characteristic biological communities of the site (including its qualifying species) are dependent on the integrity of sections of river channel, riparian areas, and transitional and marine waters that lie outside of the site boundary. Headwater areas and tributaries may not fall within the site boundary, yet a range of species characteristic of the site may use these areas for spawning and juvenile development and be critical for sustaining populations within the site. Fully developed riparian zones are essential to site integrity, yet part of this zone may lie outside of the site boundary, particularly if the river channel is operating under natural processes and moves laterally over time within the floodplain. The conditions experienced by long-distance migratory species (such as salmon, sea and river lampreys, allis and twaite shads and eels) outwith the site (through the saline transition zone, estuary, coastal waters and into the high seas) are critical to the well-being of populations within the site. Off-site influences that may impact on the well-being of the population within the site may include, but not limited to, entrainment, temperature, water quality, mortality from exploitation. The adjacent habitat is in hydrological continuity with the river. The river floodplain comprises characteristic vegetation types that

reflect the natural variation in topographical and hydrological conditions. The fen habitats show characteristic zonations of vegetation types arising from hydrological factors and the zonation is not truncated or fragmented by land use or management factors.

SAC Compensatory Habitats

Site description

A.17 The SAC Compensatory Habitats comprise: the River Test (River Dun, River Dever, Bourne Rivulet, and Middle River Test) and the River Meon. The compensatory habitats will cover all of the river catchments from the top of the winterbournes to the point where they join the River Test (for the Test tributaries) or Solent (for the Meon). The Cheriton Stream is also being used as compensatory habitat, however it is within the River Itchen SAC; there are no additional impact pathways on the Cheriton Stream that require assessment in the HRA.

A.18 Natural England has stated that "the River Meon and River Dever are being considered as compensatory habitat for Southern Water's Drought Plan. At the point the Drought Order is enacted the River Meon will be considered as the River Itchen Compensatory Habitat SAC, similarly the River Dever will become the River Test Compensatory Habitat SAC. This should be taken forward for consideration in the Plan HRA."

Qualifying features

- River Meon Compensatory SAC: Atlantic salmon and 'Water courses of plain to montane levels with *R. fluitantis'* (Chalk stream habitat).
- River Test Compensatory SAC: 'Water courses of plain to montane levels with *R. fluitantis'* (Chalk stream habitat).

Conservation objectives

A.19 Not available.

Key vulnerabilities

A.20 Unknown, but likely to be similar to the River Itchen SAC.

Non-qualifying habitats and species upon which the qualifying habitats and/or species depend

A.21 As for River Itchen SAC.

East Hampshire Hangers SAC

Site description

A.22 The East Hampshire Hangers is designated primarily for its examples of beech forests and its mixed woodland associated with base-rich slopes in addition to chalk grassland of importance to orchids, yew forests and its population of Early gentian. The beech forests are extremely rich in terms of vascular plants and include areas with old pollards on former wood-pasture as well as high forest. The sloped mixed woodland is unusual in southern England and notably contains areas of small-leaved lime. The moss flora is richer than on the chalk examples and includes several species that are rare in the lowlands. The Wealden Edge Hangers component of the site contains stands of yew *Taxus baccata* woodland.

Qualifying features

- H9130 *Asperulo-Fagetum* beech forests
- H9180 *Tilio-Acerion* forests of slopes, screes and ravines * Priority feature
- H6210 Semi-natural dry grasslands and scrubland facies on calcareous substrates (*Festuco-Brometalia*) (* important orchid sites)
- H91J0 *Taxus baccata* woods of the British Isles * Priority feature

Conservation objectives

A.23 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 and habitats of qualifying species;
- The structure and function (including typical species) of qualifying natural habitats;

- The structure and function of the habitats of qualifying species;
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely;
- The populations of qualifying species; and
- The distribution of qualifying species within the site.

Key vulnerabilities

A.24 Air Pollution (risk of atmospheric nitrogen deposition):

- Nitrogen deposition exceeds the site-relevant critical load for ecosystem protection and hence there is a risk of harmful effects, but the sensitive features are currently generally considered to be in favourable condition on the site (those few that are unfavourable are unfavourable for specific reasons unrelated to nitrogen). This requires further investigation.

A.25 Invasive species:

- A non-native hybrid ivy is smothering out the ground flora and spreading in one of the hangers.

A.26 Forestry and woodland management:

- A small portion of the SAC is in unfavourable condition due to lack of understorey. Attempts at providing regeneration have been poorly implemented and in addition parts of this area are thick with ruderal vegetation.

Non-qualifying habitats and species upon which the qualifying habitats and/or species depend

A.27 Natural England's Conservation Objectives: Supplementary Advice for this site identify the following dependencies:

A.28 *Festuco-Brometalia* grasslands require thin, well-drained, lime-rich soils associated with chalk and limestone. Most of these calcareous grasslands are maintained by grazing (to control scrub). *Asperulo-Fagetum* beech forests require circumneutral to calcareous soils. Each community has a different associated suite of species which change according to slope and soil type. *Tilio-Acerion* ravine forests are woods of ash, wych elm and lime. The habitat type typically occurs on nutrient-rich soils that often accumulate in the shady micro-climates towards the bases of slopes and ravines. These habitats are all associated with a community of plant

species, which need to be maintained as components of the qualifying habitats. Early gentian requires bare ground or in thin turf that is kept open by a combination of rabbit or sheep-grazing and trampling by livestock on thin droughted soils.

A.29 Supporting offsite habitat is relevant to this site: Additional areas of calcareous grassland and other species rich grasslands occur near to the SAC. These need to be maintained to support wider populations of the species that characterise the SAC and maintain the resilience of the habitat.

Appendix B
HRA Screening of policies and sites

B.1 The sections below identify the Neighbourhood Plan policies and site options that have been screened in or out, and the reasoning behind those judgements.

Screening of policies

Policies screened out – no impact pathway

B.2 The following policies have been screened out as they will not result in new development or activities that could have a likely significant effect and/or there is no impact pathway:

- **Policy: Architecture and Urban Design –** this policy sets out design principles for new development but will not itself result in new development.
- **Policy: Delivery, Monitoring and Review –** explains how the Neighbourhood Plan will be monitored and reviewed, and how infrastructure provision will be funded, but will not itself result in new development.
- **Policy: Green and Blue Infrastructure –** this policy sets out principles for the protection of green and blue infrastructure and will not result in new development.
- **Policy: Historic Environment** - this policy sets out historic environment principles for new development but will not itself result in new development.
- **Policy: Locally Designated Heritage Assets** - this policy sets out historic environment principles for new development but will not itself result in new development.
- **Policy: Housing Size, Type and Mix –** this policy defines the desired housing mix but will not itself result in new development.
- **Policy: Key Views** - this policy sets out principles for new development in relation to key views and will result in new development.
- **Policy: Landscape** - this policy sets out landscape principles for new development but will not itself result in new development.
- **Policy: Local Green Spaces –** this policy identifies Local Green Spaces and will not result in new development.

- **Policy: New Alresford Settlement Boundary –** prioritises development within the defined settlement boundary, with development outside the boundary only permitted exceptionally, but will not itself result in new development.

Policies screened out – no likely significant effects

B.3 The following policies have been screened out because, although they could result in new development / activities, the changes will be small in scale and therefore will not result in likely significant effects, either alone or in combination:

- **Policy: Movement and Access –** this policy supports new transport infrastructure such as walking and cycling infrastructure, public transport provision and parking. However, the identified measures are located within the town centre area and unlikely to have significant effects on Habitats Sites.
- **Policy: The Safeguarded Watercress Way –** this policy permits development of a former railway line for active travel, but this alternative use of existing infrastructure is not likely to have a significant effect on Habitats Sites.
- **Policy: The Town Centre –** this policy permits small scale development (e.g. changes of use), but the scale is unlikely to have significant effects on Habitats Sites.

Policies screened in

B.4 The following policies have the potential for likely significant effects and require further consideration in the Appropriate Assessment:

- **Policy: Community Facilities –** permits new, expanded or improved community facilities.
- **Policy**: **Employment –** permits expansion and intensification of employment uses within safeguarded areas, and small scale workspaces (e.g. live work) elsewhere.
- **Policy: Housing Strategy –** this policy defines the total quantum of housing development in New Alresford (608, including 100 in the Neighbourhood Plan).
- **Policy: Sustainable Tourism / Visitor Economy –** permits new or enhanced visitor or tourism facilities including accommodation.

Policies providing mitigation

B.5 The following policies contribute to mitigation for development impacts associated with other policies in the plan, and are taken into account in the Appropriate Assessment (and not during the screening of other policies):

- **Policy: Green and Blue Infrastructure –** this policy seeks to safeguard green infrastructure including water courses and woodland, which would contribute to mitigation against loss of habitat. The policy also refers to the need for sustainable drainage systems, which would contribute to mitigation against water pollution.
- **Policy: Local Green Spaces –** this policy seeks to safeguard Local Green Spaces and, as such, may contribute to mitigation against loss of habitat.
- **Policy: Movement and Access –** this policy supports measures that encourage cycling and walking, which could contribute towards mitigation for air pollution impacts.

Screening of site options

Physical damage and loss of habitat

B.6 Development could have a significant effect if it occurs within or immediately adjacent to a Habitats Site (River Itchen SAC) or functionally linked land (used by otters or southern damselflies).

B.7 Site options meeting screening criteria:

- No sites within River Itchen SAC but NA07 is adjacent to it.
- No sites within/adjacent to likely FLL (mapped lowland fen / chalk stream habitat), but there may be unmapped FLL at any of the greenfield sites (NA01, NA06, NA07, NA09).

Non-physical disturbance

B.8 Development could have a significant effect if it occurs within 500m of a Habitats Site (River Itchen SAC) or functionally linked habitat that supports qualifying features susceptible to impacts from non-physical disturbance, such as vibration, noise or light (otters or southern damselflies).

B.9 Site options meeting screening criteria:

- All site options (within 500m of the SAC and likely FLL).

Air pollution (vehicle emissions)

B.10 Development could have a significant effect on roads within 10km of the plan area and within 200m of a Habitats Site (M3 past River Itchen SAC, M32 and A33 at West Stratton pas River Dever, and A32 alongside River Meon), if it:

- increases traffic flows by at least 1,000 AADT (all traffic) or 200 AADT (heavy duty vehicles); and/or
- increases pollutants (nitrogen deposition, acid deposition, nitrogen oxides or ammonia) by 1% or more of the relevant critical load.

B.11 Site options meeting screening criteria:

- All site options (in combination with other plans or projects).

Changes in water quality / quantity (direct pollution

B.12 Development could have a significant impact if it is adjacent to or upstream of a Habitats Site (River Itchen SAC) or functionally linked land (otters and southern damselflies).

B.13 Site options meeting screening criteria:

- NA07 is adjacent to River Itchen SAC.
- NA01, NA04, NA06, NA09 are within 500m of the SAC (/FLL) and slightly uphill; there may be some hydrological connectivity with the SAC.
- No sites adjacent to likely FLL (mapped lowland fen / chalk stream habitat), but there may be unmapped FLL at any of the greenfield sites (NA01, NA06, NA07, NA09).

Changes in water quality / quantity (abstraction)

B.14 Development could have a significant impact if it increases demand for water supply that is abstracted from the River Itchen catchment (River Itchen SAC and River Meon).

B.15 Site options meeting screening criteria:

- All site options.

Changes in water quality / quantity (wastewater treatment)

B.16 Development could have a significant impact if it increases demand for wastewater treatment that discharges into the River Itchen catchment (River Itchen SAC).

B.17 Site options meeting screening criteria:

- All site options.

Recreation pressure

B.18 Development could have a significant impact if new residential or overnight tourist development is within the 'zone of influence' of a sensitive site (5km-15km, as identified in the Winchester Local Plan HRA, depending on the site).

B.19 Site options meeting screening criteria:

- None.

References

1 The integrity of a site is the coherence of its ecological structure and function, across its whole area, that enables it to sustain the habitat, complex of habitats and/or the levels of populations of the species for which it was designated. (Source: UK Government Planning Practice Guidance)

2 https://www.gov.uk/guidance/appropriate-assessment

3 Classified (a) before the day of the UK's exit from the EU (31 January 2020) in accordance with Article 4(1) or 4(2) of the European Union Wild Birds Directive for rare and vulnerable birds (as listed in Annex I of the Directive), and under Article 4(2) for regularly occurring migratory species not listed in Annex I, or (b) after exit day under the retained transposing regulations.

4 The network of protected areas identified by the EU: https://ec.europa.eu/environment/nature/natura2000/index_en.htm

5 https://www.gov.uk/government/publications/changes-to-the-habitats-regulations-2017/changes-to-the-habitats-regulations-2017

6 Defra and Natural England (2021) Guidance - Habitats regulations assessments: protecting a European site, https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site

7 NPPF (2024) para 194, available from https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf

8 The HRA Handbook, Section A3. David Tyldesley & Associates, a subscription based online guidance document: https://www.dtapublications.co.uk/handbook/European

9 Department for Environment, Food and Rural Affairs, Natural England, Welsh Government and Natural Resources Wales (2021) Habitats regulations assessments: protecting a European site, www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site

10 Regulation 5 of the Habitats Regulations 2017

11 UK Government Planning Practice Guidance, available from https://www.gov.uk/guidance/appropriate-assessment

12 European Commission (2001) Assessment of plans and projects significantly affecting European Sites. Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC.

13 The HRA Handbook. David Tyldesley & Associates, a subscription based online guidance document: https://www.dtapublications.co.uk/handbook/European

14 Conservation objectives are published by Natural England for SACs and SPAs: http://publications.naturalengland.org.uk/category/6490068894089216

15 In line with the CJEU judgment in Case C-323/17 People Over Wind v Coillte Teoranta, mitigation must only be taken into consideration at this stage and not during Stage 1: HRA Screening.

16 In addition to European site citations and conservation objectives, key information sources for understanding factors contributing to the integrity of Habitats Sites include (where available) conservation objectives supplementary advice and Site Improvement Plans prepared by Natural England: http://publications.naturalengland.org.uk/category/5458594975711232

17 LUC (2024) Winchester Local Plan HRA (Reg.19), https://www.localplan.winchester.gov.uk/LibraryAssets/inline/264/Winchester-Local-Plan-HRA-Reg19-Version-2.pdf

18 LUC (2024) Winchester Local Plan HRA addendum to Reg.19 HRA, https://www.localplan.winchester.gov.uk/assets/attach/1000/sd04a-addendum-to-the-habitats-regulation-assessment-november-2024-.pdf

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