



Supplementary Planning Document: Affordable Homes in New Development

Strategic Environmental Assessment (SEA) Screening Opinion

Habitat Regulations Assessment (HRA) Screening Opinion

November 2024

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1. Introduction

- 1.1 This SEA screening statement has been prepared to determine whether the Council's proposed **Supplementary Planning Document (SPD) on Affordable Homes in New Development** requires a Strategic Environmental Assessment (SEA).
- 1.2 This Screening Opinion is provided to the statutory consultation bodies for SEA (the Environment Agency, Historic England and Natural England) for their opinion. Subsequently, Hart District Council will make a final decision in respect of whether SEA is required.
- 1.3 **Appendix 1** presents a Habitat Regulations Assessment (HRA) screening for likely significant effects on a European site (in Hart, the Thames Basin Heaths Special Protection Area).
- 1.4 This draft screening determination is based on the Draft SPD dated November 2024.

2. Background

- 2.1 Strategic environmental assessment (SEA) is a procedure (set out in the Environmental Assessment of Plans and Programmes Regulations 2004) which requires the formal environmental assessment of certain plans and programmes which are likely to have significant effects on the environment.
- 2.2 Screening explores potential cause-effect relationships between the plan or programme and the environmental baseline. Where it is determined that a plan or programme is likely to have a significant effect on the environment, an SEA process is required. Where it is determined that the plan or programme does not require SEA, a statement of reasons should be prepared and submitted alongside the plan.
- 2.3 If the HRA screening establishes that an appropriate assessment is needed (see Appendix 1) then an SEA is automatically triggered.

3. The scope of the SPD

- 3.1 The Council is preparing an SPD which provides guidance on the provision of affordable homes when preparing a planning application.
- 3.2 It is designed to help applicants meet the requirements for affordable homes set out national planning policy and local planning policy (Policy H2-Affordable Housing) set out in the Hart Local Plan (Strategy & Sites) 2032 (HLP32), which sets out the levels and types of affordable homes that are required in relation to qualifying developments, as well as support pre-application discussions and the submission of planning applications.
- 3.3 More specifically the aim of the guidance is to recommend that affordable homes are considered early in the planning process and ensure that the Council is better placed to secure social rented accommodation as part of the "65% affordable housing for rent" Policy H2 requirement.

- 3.4 This will ensure that the optimum quantity, mix, type and tenure of affordable homes for rent that meet local needs is delivered. It will also clarify the Council's approach to off-site provision and the calculation of financial contributions in lieu of on-site provision.

4. SEA Screening Assessment

- 4.1 SPDs add further detail to policies in the development plan. They are capable of being a material consideration in planning decisions but are not part of the development plan. New policy cannot be introduced through SPD.
- 4.2 Generally, SPDs do not require SEA. However, SPDs may, in exceptional circumstances, require SEA if they are likely to have significant environmental effects that have not already been assessed during the preparation of the relevant strategic policies. The Council is therefore required to undertake SEA screening to assess whether the SPD is likely to have significant environmental effects, and to consult the consultation bodies.
- 4.3 The SEA screening has been conducted by assessing the draft SPD against the criteria listed at Schedule 1 of the SEA Regulations set out at Tables 1 and 2.
- 4.4 In summary, the SPD is unlikely to give rise to significant environmental effects. It does not set new policy and no new development will arise as a direct result of this guidance. Rather, it provides guidance on the implementation of policy contained in the Hart Local Plan (Strategy and Sites) 2032 which has already been subject to Sustainability Appraisal incorporating Strategic Environmental Assessment.
- 4.5 Providing greater clarity on the Council's requirements will help avoid problems associated with under-provision of affordable housing for rent as well as securing an appropriate mix (number of bedrooms), type (e.g. flats or houses) and tenure which meets local need.
- 4.6 Appendix 1 sets out an HRA screening assessment which concludes that a full appropriate assessment is not required. This means that SEA is not triggered by a need to undertake an appropriate assessment.

Appendix 1: SEA screening

Table 1: Characteristics of the SPD

Criterion	Potential for significant effects?
<p>a) The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources.</p>	<p>No</p> <p>The SPD is intended to support Policy H2- Affordable Housing of the Hart Local Plan (Strategy & Sites) 2032 (HLP32), recommend that affordable homes are considered early in the planning process and ensure that the Council is better placed to secure social rented accommodation as part of the “65% affordable housing for rent” Policy H2 requirement. It will not change the overall policy requirement.</p> <p>No new development will arise as a direct result of this guidance and for the purposes of Strategic Environmental Assessment it is considered that there will not be any significant environmental effects.</p>
<p>b) The degree to which the plan or programme influences other plans and programmes including those in a hierarchy.</p>	<p>No</p> <p>The SPD will provide guidance on policy contained within the Hart Local Plan. It will not modify or influence the policies of the local plan. It will sit beneath those policies in terms of a hierarchy.</p>
<p>c) The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development.</p>	<p>No</p> <p>The SPD aims to positively contribute towards sustainable development by providing an appropriate quantum, mix, type and tenure of affordable housing for rent in relation to qualifying development proposals. This will better address local need for eligible households, whose needs are not met by the market.</p> <p>It is considered that the SPD will make a positive impact not only on individual sites but improve affordable housing delivery across the District.</p> <p>However, the SPD will not increase the overall quantum of new development and therefore for the purposes of SEA there will not be any significant environmental effects.</p>
<p>d) Environmental problems relevant to the plan or programme.</p>	<p>No</p> <p>The SPD will positively influence new development with regards to affordable housing provision as it</p>

	will better address local need and will not increase the overall quantum of new development. Therefore, no significant adverse environmental problems are foreseen.
e) The relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste management or water protection).	No The SPD will have a limited impact on the implementation of European Community legislation.

Table 2: Characteristics of the effects and of the area likely to be affected

Criterion	Potential for significant effects?
A) The probability, duration, frequency and reversibility of the effects.	No In and of itself the SPD will not bring forward new development plans or projects. It will provide guidance on affordable housing provision in new developments. The probability of any effect is therefore low. The effects are expected to be positive in nature.
b) The cumulative nature of the effects.	No The SPD is not anticipated to have any cumulative effects other than over time more developments complying with the new guidance on affordable housing. The cumulative effects of the Hart Local Plan, which this SPD will support, were considered and addressed during the production of the Local Plan.
c) The trans-boundary nature of the effects.	No The effects of this SPD will be limited to Hart District.
d) The risks to human health or the environment (e.g. due to accidents).	No The SPD, aimed at affordable housing provision in new developments, will not result in any increase in risks to human health or the environment.
e) The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected).	No The SPD will only apply to developments in Hart District.
f) The value and vulnerability of the area likely to be affected due to:	No

<p>i) Special natural characteristics or cultural heritage; ii) exceeded environmental quality standards or limit values; iii) intensive land-use.</p>	<p>In and of itself the SPD will not direct or establish the principle of development. It is limited to matters of affordable housing.</p>
<p>g) The effects on areas or landscapes which have recognised national, community or international protection status.</p>	<p>No In and of itself the SPD will not direct or establish the principle of development. It is limited to matters of affordable housing.</p>

Appendix 2: Habitat Regulations Assessment (HRA)

A2.1 Under the Conservation of Habitats and Species Regulations 2017 it is necessary to consider whether the **Affordable Homes in New Development SPD** is likely to have a significant effect on a European site (Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites, either alone or in combination with other plans or projects.

A2.2 Where the potential for likely significant effects cannot be excluded, the Council must make an appropriate assessment of the implications of the plan or project for that site, in view the site's conservation objectives.

A2.3 There are 4 distinct steps in the HRA process which should be followed in order. These are:

Step 1: Screening – identification of likely impacts on European sites, either alone or in combination with other plans and projects, and a consideration of whether the impact is significant.

The objective is to 'screen out' those plans and projects that can, without any detailed appraisal, be said to be unlikely to result in significant impacts upon European sites, usually because there is no mechanism for an interaction with European sites.

If significant effects are likely or cannot be screened out it is necessary to move on to the Appropriate Assessment at step 2.

Step 2: Appropriate Assessment – consideration of the impact on the integrity of European sites with regards to the site's structure, function and conservation objectives. Where effects are significant, mitigation measures should be considered. If step 2 cannot rule out significant effects with mitigation, then the process moved onto the consideration of alternative solutions at step 3.

Step 3: Assessment of alternative solutions – consideration of other methods of achieving the aims of the plan or project whilst avoiding impacts.

Step 4: Assessment of Compensatory Measures – If impact cannot be avoided, no alternative solutions exist and there is overriding public interest for implementing the plan or project, consideration should be given to compensatory measures.

Step 1 – Screening

A2.4 The SPD supplements Policy H2-Affordable Housing in the [Hart Local Plan \(Strategy and Sites\) 2032](#). The policy refers to a requirement for 40% of new homes, in relation to qualifying developments, to be affordable.

A2.5 The SPD clarifies the Council's policy requirements and approach to affordable housing provision and sets out the levels and types of affordable homes that are required in relation to qualifying developments, as well as support pre-application discussions and the submission of planning applications.

- A2.6 It will also recommend that affordable homes are considered early in the planning process and ensure that the Council is better placed to secure social rented accommodation as part of the “65% affordable housing for rent” Policy H2 requirement. The SPD will not introduce new policy or any site allocations. It will not result in any increase in development.
- A2.7 The Hart Local Plan was subject to a Habitats Regulations Assessment which considered any in-combination effects with other plans and projects and was prepared in consultation with Natural England. The Local Plan HRA considered the potential effects on the following European sites:
- Thames Basin Heaths Special Protection Area sites
 - Bramshill SSSI
 - Hazeley Heath SSSI
 - Castle Bottom to Yateley and Hawley Commons SSSI
 - Bourley and Long Valley SSSI
- A2.8 The following impact pathways were identified as being relevant to the Hart Local Plan HRA:
- Urbanisation and recreational pressure
 - Atmospheric pollution
- A2.9 The Hart Local Plan HRA undertook a test of likely significant effects for policies and allocations contained within the plan. Policies and allocations assessed as having no HRA implications or potential impact pathways linked to European sites were screened out from further consideration. In relation to relevant policy H2-Affordable Housing, the Local Plan HRA, 2018 findings are set out below in Table 3.

Table 3: Hart Local Plan 2032 – HRA likely significant effects test

Policy	Policy description	Screening assessment
H2 - Affordable Housing	Outlines the Council’s requirements for affordable housing within developments.	<p>No HRA implications.</p> <p>This is a development management policy relating to the provision of affordable housing within a development site. No location or quantum is identified.</p> <p>There are no impact pathways present.</p>

- A2.10 The SPD is providing supplementary guidance to support the implementation of Policy H2 which was screened out of having any likely significant effects. The SPD does not dictate the principle of development, nor does it direct development to a specific location. Therefore, as with the assessment of H2-Affordable Housing as part of the Hart Local Plan HRA, it is considered that

there are no linking impact pathways present and there are no HRA implications. A full Appropriate Assessment is not required.