

Hadlow Down Community Centre

Report to inform Habitats Regulations Assessment

Hadlow Down Community Centre Committee

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Quality information

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1. Introduction

1.1 Background to the Project

AECOM was appointed by the Hadlow Down Community Centre Committee to produce a report to inform Wealden District Council's Appropriate Assessment of the development of the aforementioned community centre (hereafter referred to as the 'Community Centre').

The objective of this report was to identify any aspects of the project that would cause an adverse effect on the integrity of Natura 2000 sites, otherwise known as European sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and, as a matter of Government policy, Ramsar sites), either in isolation or in combination with other plans and projects, and to advise on appropriate mechanisms for delivering mitigation where such effects are identified.

1.2 Legislation

The need for Appropriate Assessment is set out within Article 6 of the EC Habitats Directive 1992, and interpreted into British law by the Conservation of Habitats and Species Regulations 2017. The ultimate aim of the Directive is to “maintain or restore, at favourable conservation status, natural habitats and species of wild fauna and flora of Community interest” (Habitats Directive, Article 2(2)). This aim relates to habitats and species, not the European sites themselves, although the sites have a significant role in delivering favourable conservation status.

The Habitats Directive applies the precautionary principle to European sites. Plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the site(s) in question. Plans and projects with predicted adverse impacts on European sites may still be permitted if there are no alternatives to them and there are Imperative Reasons of Overriding Public Interest (IROPI) as to why they should go ahead. In such cases, compensation would be necessary to ensure the overall integrity of the site network.

In order to ascertain whether or not site integrity will be affected, an Appropriate Assessment should be undertaken of the plan or project in question:

Box 1: The legislative basis for Appropriate Assessment

Habitats Directive 1992

Article 6 (3) states that:

“Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives.”

Conservation of Habitats and Species Regulations 2017

The Regulations state that:

“A competent authority, before deciding to ... give any consent for a plan or project which is likely to have a significant effect on a European site ... shall make an appropriate assessment of the implications for the site in view of that sites conservation objectives... The authority shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site”.

Over time, the phrase 'Habitats Regulations Assessment' (HRA) has come into wide currency to describe the overall process set out in the Habitats Directive from screening through to IROPI. This has arisen in order to distinguish the process from the individual stage described in the law as an 'Appropriate Assessment'. Throughout this report, the term 'HRA' is used for the overall process and the use of the term 'Appropriate Assessment' is restricted to the specific stage of that name.

1.3 Scope of the Project

There is no pre-defined guidance that dictates the physical scope of an HRA of a project such as the Community Centre. Therefore, in considering the physical scope of the assessment, identified impact pathways (called the source-pathway-receptor model) are considered.

Briefly defined, pathways are routes by which a change in activity resulting from the project, either alone or in combination with other plans and projects, can lead to an effect upon an internationally designated site. An example of this would be new residential development resulting in an increased population and thus increased recreational pressure, which could then affect European sites by, for example, disturbance of breeding birds. Guidance from the former Department of Communities and Local Government (DCLG) states that the HRA should be "*proportionate to the geographical scope of the [project]*" and that "*an AA need not be done in any more detail, or using more resources, than is useful for its purpose*" (CLG, 2006, p.6). More recently, the Court of Appeal¹ ruled that providing the competent authority was duly satisfied that proposed mitigation could be '*achieved in practice*' to satisfy that the proposed development would have no adverse effect, then this would suffice. This ruling has since been applied to a planning permission². In this case, the High Court ruled that for "*a multistage process, so long as there is sufficient information at any particular stage to enable the authority to be satisfied that the proposed mitigation can be achieved in practice it is not necessary for all matters concerning mitigation to be fully resolved before a decision maker is able to conclude that a development will satisfy the requirements of Reg 61 of the Habitats Regulations*".

The European sites that are considered to require consideration within this report to inform a HRA due to distances from the Community Centre, and possible pathways of impact, are Ashdown Forest SAC and SPA. The reasons for designation of the SAC and SPA, together with current trends in habitat quality and pressures on the sites, are presented in Chapter 4. The location of the SAC and SPA in relation to the proposed Community Centre is shown in Figure 1 (located at the end of this report).

Description of the proposed Community Centre

A new Community Centre is to be constructed, which will provide up to date replacements for the existing sport pavilion and village hall facilities in a two storey building, together with provision of 43 on site car parking spaces, including 4 disabled spaces as well as secure and covered cycle parking for 10 cycles.

Overall, the GIA of the new building will be 807.3sqm, which compares with 296.5sqm GIA of the existing Village Hall and Sports Pavilion. On the face of it, this appears to be a significant increase in area; however, it needs to be borne in mind that the existing facilities do not meet current standards. In particular, the new Sport Pavilion element amounts to 373.9sqm compared with 895.4sqm previously, but this is needed to meet the current standards for changing facilities identified by Sport England, and will provide significantly improved welfare facilities for users of the football and cricket pitches. It should be noted that the number of pitches available will not change therefore there will be no increase in usage and hence users, they will just enjoy better facilities.

Likewise, the ancillary facilities provided to support the Village Hall element are not up to current standards. These ancillary facilities amount to 239sqm GIA and include the toilets, kitchen, storage, plant room and circulation areas, compared with 85.1sqm in the existing Village Hall.

The hall area of the new Community Centre amounts to 194.4sqm compared with the existing hall, which has an area of 116sqm GIA.

¹ No Adastral New Town Ltd (NANT) v Suffolk Coastal District Council Court of Appeal, 17th February 2015

² High Court case of R (Devon Wildlife Trust) v Teignbridge District Council, 28 July 2015

It should also be noted that an extension of the existing Village Hall amounting to a further 108sqm was approved under a Permitted Development Rights application. It was intended as an extension to the main hall but not progressed. Had it been built, then the increase in the hall area for the new Community Centre would be much smaller, possibly even parity, as most of the extension area was intended as Hall. However, in carrying out an assessment of trip generation for this assessment (see Section 3.4.1), Monson Engineering Ltd have not included the additional 108sqm in the 'existing' use. Rather they have considered the actual situation that currently exists.

2. HRA Process

2.1 Introduction

The HRA has been carried out in the continuing absence of formal central Government guidance, although general EC guidance on HRA does exist³. The former DCLG released a consultation paper on the Appropriate Assessment of Plans in 2006⁴. As yet, no further formal guidance has emerged. However, Natural England has produced its own internal guidance⁵ as has the RSPB⁶. Both of these have been referred to alongside the guidance outlined in Section 1 of this report in undertaking this HRA.

Figure 2 below outlines the stages of HRA according to the 2006 DCLG consultation paper. The stages are essentially iterative, being revisited as necessary in response to more detailed information, recommendations and any relevant changes to the plan/project until no significant adverse effects remain.

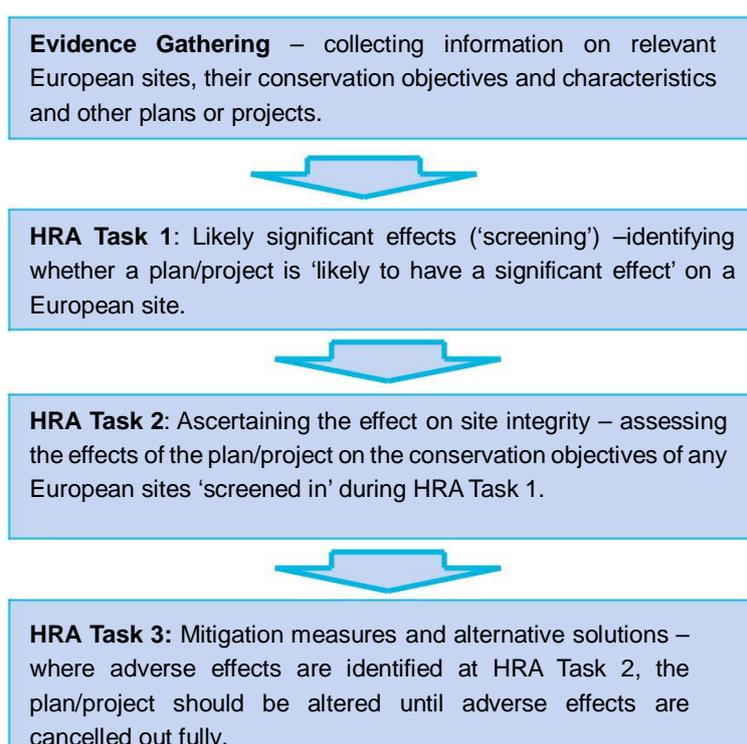


Figure 2: Four Stage Approach to Habitats Regulations Assessment. Source CLG, 2006.

³ European Commission (2001): Assessment of plans and projects significantly affecting Natura 2000 Sites: Methodological Guidance on the Provisions of Article 6(3) and 6(4) of the Habitats Directive.

⁴ CLG (2006) Planning for the Protection of European Sites, Consultation Paper

⁵ http://www.ukmpas.org/pdf/practical_guidance/HRGN1.pdf

⁶ Dodd A.M., Cleary B.E., Dawkins J.S., Byron H.J., Palframan L.J. and Williams G.M. (2007) *The Appropriate Assessment of Spatial Plans in England: a guide to why, when and how to do it*. The RSPB, Sandy.

2.2 HRA Task 1: Likely Significant Effects

The first step in the HRA process is a risk assessment to determine whether risks of a significant effect (alone or in combination) can be dismissed with no further consideration. In their pre-application advice on 11 December 2017, Wealden District Council stated that they would expect the Applicant to:

“...have a clear idea of the zone of influence of the community hall, and whether any growth in the development would lead to potential impact beyond the Parish boundaries, and most critically the Ashdown Forest Special Area of Conservation and Special Protection Area – noting the site does lie about 5.8Km (as the crow flies) from the Ashdown Forest SPA and SAC designated areas.”

In making this stipulation, it is clear that the competent authority had already considered that likely significant effects could not be dismissed without further analysis. This report therefore constitutes a technical report to inform the competent authority's appropriate assessment (HRA Task 2).

2.3 HRA Task 2 – Appropriate Assessment

Following consideration of Likely Significant Effects, the next stage of any Habitat Regulations Assessment is an appropriate assessment to determine whether an adverse effect on the integrity (the coherent structure and function) of the European site will arise from the project alone or in combination with other projects and plans. Note that 'appropriate assessment' is not a technical term, it simply means whatever level of assessment is appropriate in a given case to conclude no adverse effects on integrity beyond a reasonable scientific doubt. Note that case law has established that a requirement for an absence of reasonable scientific doubt is not the same as a requirement for absolute certainty.

In potential for adverse effects on integrity, AECOM has relied on our professional judgement, a transport statement (including trip generation calculations), prepared by Monson Engineering Ltd, and the results of previous stakeholder consultation regarding development impacts on the European sites considered within this assessment.

3. Ashdown Forest SAC and SPA

3.1 Introduction

Ashdown Forest is one of the most extensive areas of heathland in south-east England. It lies between East Grinstead and Crowborough in East Sussex and the Local Planning Authority is Wealden District Council.

Although the area of heathland has declined in recent years, due to cessation of grazing and frequent fires, there remain extensive areas of dry heath dominated by ling *Calluna vulgaris* with bell heather *Erica cinerea* and dwarf gorse *Ulex minor*. This heathland supports important lichen communities including species such as *Pycnothelia papillaria*. Bracken *Pteridium aquilinum* is now dominant over large areas. On the damper heath, cross-leaved heath *Erica tetralix* becomes dominant with deer-grass *Trichophorum cespitosum*. The heath and bracken communities form a mosaic with acid grassland dominated by purple moor-grass *Molinia caerulea* with species such as the local petty whin *Genista anglica*. Wet areas provide suitable conditions for several species of sphagnum moss, together with which are found bog asphodel *Narthecium ossifragum*, common cotton-grass *Eriophorum angustifolium* and specialities such as marsh gentian *Gentiana pneumonanthe*, ivy-leaved bell flower *Wahlenbergia hederacea*, white-beaked sedge *Rhynchospora alba* and the marsh clubmoss *Lycopodiella inundata*.

Streams cut through the soft sandstone in places, forming steep sided valleys (ghylls), which are sheltered from winter frosts and remain humid in summer. Uncommon bryophytes such as the liverwort *Nardia compressa* and a range of ferns including the mountain fern *Oreopteris limbosperma* and the hayscented buckler fern *Dryopteris aemula* thrive in this atlantic microclimate. The damming of streams, digging for marl, and quarrying have produced several large ponds in a number of areas of the forest. Although often largely free of aquatic vegetation, there may be localised rafts of broadleaved pondweed *Potamogeton natans*, beds of reedmace *Typha latifolia* and water horsetail *Equisetum fluviatile*. These species are particularly abundant in the marl pits. The aquatic habitats support a diverse fauna, including a range of water beetles (Coleoptera), a rare midge *Dixella filiformis*, a diversity of dragonfly and damselfly species (Odonata) and the locally uncommon snail *Vertigo substriata*. Some of the ponds also have large amphibian populations, including the great-crested newt *Triturus cristatus*.

3.2 Features of European Interest

Ashdown Forest is designated as an SAC⁷ for its:

- Wet heathland with cross-leaved heath
- Dry heaths
- Great crested newts

Ashdown Forest is designated as an SPA⁸ for its:

- Nationally important breeding populations of nightjar (*Caprimulgus europaeus*) and Dartford warbler (*Sylvia undata*).

⁷ <http://jncc.defra.gov.uk/protectedsites/sacselection/n2kforms/UK0030080.pdf>

⁸ <http://jncc.defra.gov.uk/pdf/SPA/UK9012181.pdf>

3.3 Conservation Objectives⁹

With regard to the Ashdown Forest SAC and the natural habitats and/or species for which the site has been designated, and subject to natural change, the conservation objectives are to 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.

The Site Improvement Plan for Ashdown Forest SAC and SPA¹⁰ indicates the following threats that, at the least, are identified as requiring investigation:

- Changes in land management;
- Air quality reductions (atmospheric nitrogen deposition);
- Public access/ disturbance; and
- Hydrological changes.

3.4 Potential Effects of the Proposed Community Centre

3.4.1 Air Quality

Sources and Effects of Air Pollutants

Increases in atmospheric pollution on a European site have the potential to lead to:

- Acid deposition;
- Eutrophication;
- Increases in nitrogen deposition; and
- Toxicity effects from ozone concentrations.

The habitats of Ashdown Forest SAC and SPA are vulnerable to nutrient enrichment from atmospheric pollution, especially from vehicular emissions.

Wealden District Council position

Wealden District Council's position is set out in the recently released HRA of the Draft Proposed Submission Wealden Local Plan (June 2018)¹¹. Air quality modelling has been undertaken for Wealden District Council with regard to their Local Plan growth 'in combination' with growth in surrounding authorities and is provided on the Council's website. Based on this work, Wealden District Council's position, as set out in proposed Policy AF1, is that until necessary mitigation measures (as per Policy AF2) are in place, developments throughout the District can only proceed where it can be shown that they will have no adverse effect on the Ashdown Forest SAC. The Council interprets this as meaning that they will not generate net additional vehicle trips on affected roads. Affected roads are those that run through Ashdown Forest SAC/SPA itself.

⁹ <http://publications.naturalengland.org.uk/publication/6183967367626752>

¹⁰ <http://publications.naturalengland.org.uk/publication/5793096570765312>

¹¹ <http://council.wealden.gov.uk/documents/b50004670/Background%20Papers%20to%20Item%209%20-%20Wealden%20Local%20Plan%20-%20Draft%20Proposed%20Submission%20Document%2018th-Jul-2018.pdf?T=9>

Policy AF1 states that 'A full Habitat Regulations Assessment of the potential impacts of the development and, if appropriate, proposed mitigation measures must be submitted prior to the determination of the planning application(s)'.

It is noted that Local Plan policy AF1 also mentions two other sites: Pevensey Levels SAC/Ramsar site and Lewes Downs SAC. As these sites are both more than 15km from the site, it is considered that due to the distance, there would not be any impact pathways, and these sites are not included within this HRA.

Vehicle trips associated with the proposed Community Centre

In their pre-application advice on 11 December 2017, Wealden District Council stated that they would expect the Applicant to:

"...have a clear idea of the zone of influence of the community hall, and whether any growth in the development would lead to potential impact beyond the Parish boundaries, and most critically the Ashdown Forest Special Area of Conservation and Special Protection Area – noting the site does lie about 5.8Km (as the crow flies) from the Ashdown Forest SPA and SAC designated areas."

A TRICS analysis of the facility suggests that it would be associated with five more vehicle trips (irrespective of origin/destination) per day. Given the 5.8km distance between the facility and Ashdown Forest SAC/SPA, it is probable that even if this was a net increase in users, few if any of these trips would be through Ashdown Forest.

However, to assume the facility will involve a net increase of five vehicle trips per day on the road network is to assume that all local residents who might use the facility are already doing so and are not using alternative facilities further afield. Bob Lake, Chair and Trustee of the Hadlow Down Community Centre Committee, has prepared a summary of the current position regarding the operation of both the Village Hall and the Sports Pavilion and this is included in Appendix B of the Transport Statement. It can be seen from the summary that, for reasons of temperature, inadequate storage facilities, small main hall space and lack of height and lack of changing facilities, a series of local groups/activities that might otherwise use the existing facility are 'lost' to the current village hall: Playgroup and Toddlers Groups, 'Tumble Tots', Scouts, Badminton, Pilates and Yoga, Ballet class for older people, Spinners and Weavers and Adult Education. In order to access these groups and activities, villagers therefore travel outside the village to other towns/villages providing these facilities.

The purpose behind a new, improved Community Centre is that these groups would remain in the village, using the new facility, rather than travelling out from the village to other destinations. It is therefore considered that on balance the new Community Centre may reduce the number of trips being made, or at least reduce the distance being travelled to access alternative facilities. Either outcome is likely to have a neutral effect on vehicle movements through Ashdown Forest, or potentially result in a net reduction, but would not result in a net increase in vehicle movements through the SAC/SPA.

A further reason to conclude that the Community Centre would not result in a net increase in vehicle movements through Ashdown Forest is there are larger settlements, with equivalent facilities, which lie closer to the SAC than Hadlow Down, including:

- East Grinstead (approximately 3km north of Ashdown Forest SAC; where there is a sports centre and theatre);
- Crowborough (adjacent and partly within the Ashdown Forest SAC, at its eastern boundary; where there are a number of sports facilities including a football stadium and sports centre, and a Community Centre where the local theatre group, Crowborough Players, perform); and
- Uckfield (approximately 3.4km south of Ashdown Forest SAC; where there is a leisure centre and cinema).

It is therefore considered unlikely that residents of settlements on the opposite side of Ashdown Forest would choose to bypass these closer facilities and instead traverse the SAC/SPA to use the Community Centre.

Measures to mitigate trip generation

In their pre-application advice on 11 December 2017, Wealden District Council stated that the planning application should include:

“Measures to mitigate trip generation from the new development (compared to unfettered operation of the old sites)”.

Notwithstanding the conclusion that the most likely outcome of the new Community Centre at Hadlow Down is no net change in vehicle movements through (or even close to) Ashdown Forest SAC/SPA, a series of measures to potentially reduce trip generation have been identified within the Transport Statement.

These include:

- The new Community Centre will have a notice board within it and a page on the Village website and Travel Plan initiatives will be advertised on these and advised to potential users. As most will be from the village, it is expected that many will walk as there are footway from most of the residential properties in the village.
- It is also expected that those arriving by car will often car share. Sports teams are known for this but the notice board and website will have a facility for those offering/seeking a lift to the various functions/activities to advertise the fact and get potential sharers in touch.
- Cycle facilities are provided and will offer a convenient form of transport for locals.

In addition, the Hadlow Down Community Centre Committee will offer high-speed electrical car charging points in the car park of the new Community Centre to offset nitrogen oxide and ammonia emissions. This may incentivise more local use of electric vehicles, and bring with it some improvement on the status quo of the existing building.

Other plans and projects

All plans and projects across Wealden District that will result in a net increase in traffic movements through Ashdown Forest may operate ‘in combination’ with similar growth in surrounding authorities. However, in this case, the conclusion of the analysis is that the effect of the Community Centre on Ashdown Forest SAC/SPA would be neutral. As such, there would be no ‘in combination’ effect with other development.

Hadlow Down Parish Council intend to replace the existing Village Hall with three residential properties. However, this is subject of a separate planning application that will require its own HRA and since the Community Centre will not result in an increase in trips across the Ashdown Forest, there would be no effect ‘in combination’ between the two applications.

3.4.2 Recreational Pressure

The proposed Community Centre does not increase residential development, and is intended to provide, in itself, a recreational focus for the local community. Therefore, it is not considered that the proposed Community Centre will lead to any likely increased recreational pressure on Ashdown Forest SAC/SPA and no mitigation is required.

Other plans and projects

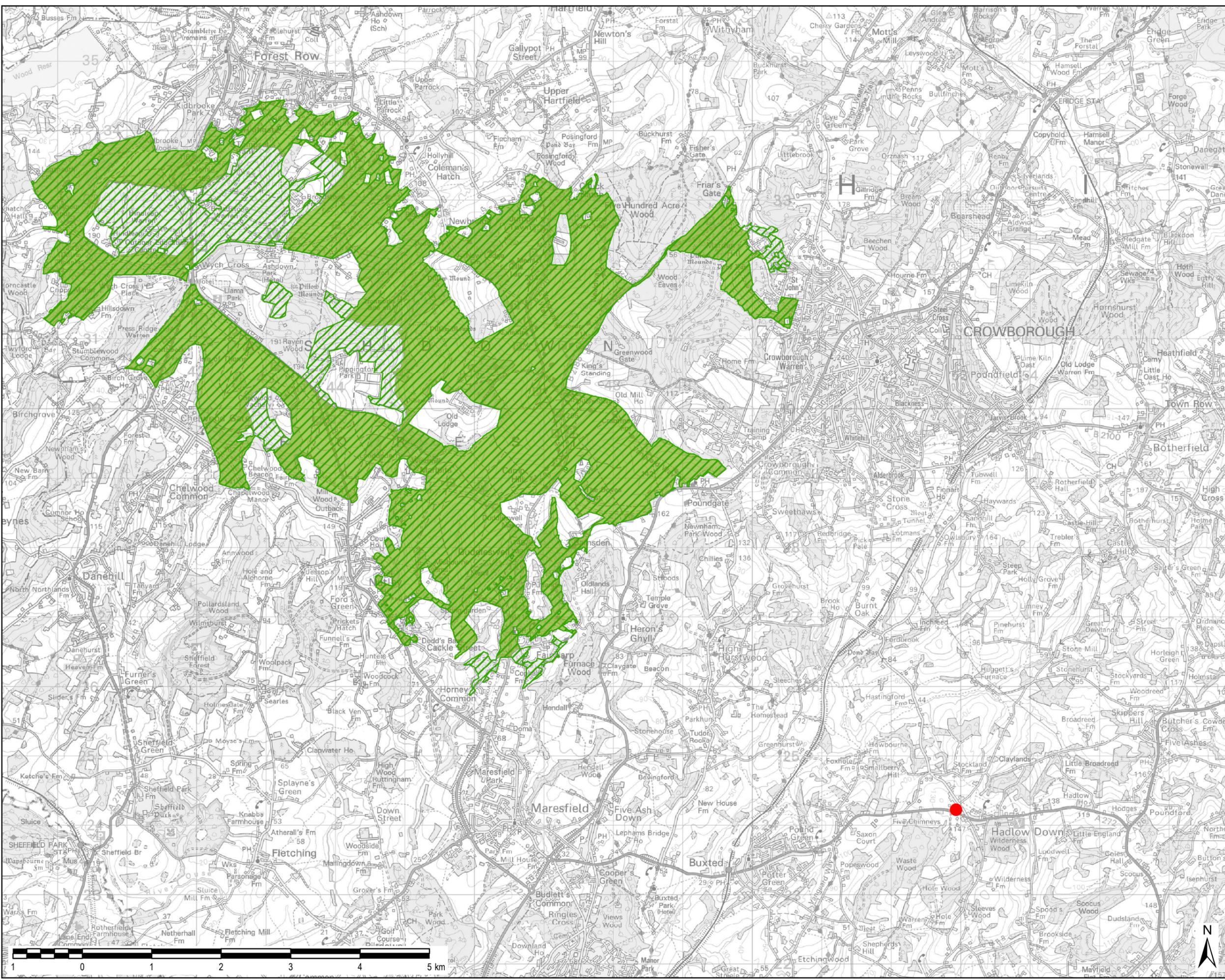
All plans and projects across Wealden District that will result in a net increase in recreational visitors to Ashdown Forest may operate ‘in combination’ with similar growth in surrounding authorities. However, in this case the conclusion of the analysis is that the effect of the Community Centre on Ashdown Forest SAC/SPA would be neutral. As such, there would be no ‘in combination’ effect with other development.

Hadlow Down Parish Council intend to replace the existing Village Hall with three residential properties. However, this is the subject of a separate planning application that will require its own HRA. Since the Community Centre will not result in an increase in recreational visitors to Ashdown Forest, there would be no effect ‘in combination’ between the two applications.

4. Conclusions

It is considered that the competent authority would be able to draw a conclusion of no adverse effect on the integrity of Ashdown Forest SAC and SPA alone or in combination with other plans and projects based on the following:

- The Community Centre is not expected to result in a net increase in trip generation since the very small number of 'additional' trips that might be associated with the improved facility are expected to be more than offset by the redistribution of existing trips, as more local residents return to the village to participate in local groups and activities. Moreover, the Committee will include electric vehicle charging points as part of the development (although this is not specifically being included as 'mitigation' for the SAC/SPA but rather as a generally positive air quality measure) and the facility is unlikely to draw users from the opposite side of Ashdown Forest to Hadlow Down (and which might traverse the SAC/SPA to visit the Community Centre) due to a combination of distance and the existence of other facilities much closer to Ashdown Forest.
- The Community Centre is not delivering a net increase in residential population of Hadlow Down and would therefore not contribute to additional recreational pressure on the SAC or SPA.



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- LEGEND**
- Hadlow Down Community Centre Location
 - Ashdown Forest Special Area of Conservation (SAC)
 - Ashdown Forest Special Protection Area (SPA)

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