



Runnymede Borough Council

Draft Englefield Green Village Neighbourhood Plan

Strategic Environmental Assessment (SEA)

FINAL Screening Statement and Determination under Regulation 9 of the SEA Regulations 2004

Habitats Regulations Assessment (HRA)

FINAL Screening Statement and Determination under Regulation 105 & 106 of the Conservation of Habitats and Species Regulations 2017

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Produced by Runnymede Borough Council Planning Policy Team

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1. Summary

- 1.1 This Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) screening determination has been undertaken by Runnymede Borough Council in its duty to determine whether the Englefield Green Village Neighbourhood Plan (EGV NP) requires SEA or HRA. This screening assessment is based on a pre-submission draft version of the Neighbourhood Plan dated June 2022.
- 1.2 The three statutory consultation bodies (Natural England, Historic England and the Environment Agency) were consulted on the assessment outcomes on 24th June 2022 for a five week period. Taking into account feedback from consultation with the statutory bodies, the Council has concluded that the EGV NP is unlikely to give rise to any significant environmental effects or have any significant effects on a European site. Accordingly, RBC as the responsible/competent authority is minded to determine that no SEA and/or HRA assessment is required for the EGV NP.
- 1.3 The following report includes a statement of reasons for the draft determination (in accordance with Regulation 9 of the SEA Regulations) in paragraph 6.3. A final determination will be made following the pre-submission consultation on the draft EGV NP, taking into account any amendments made to the Plan in response to representations.

2. Introduction

Strategic Environmental Assessment (SEA); Sustainability Appraisal (SA) & Habitats Regulations Assessment (HRA)

- 2.1 Strategic Environmental Assessment (SEA) is a systematic process used during the preparation of plans and policies and it aims to provide a high level of protection for the environment; it contributes to the integration of environmental considerations in the plan preparation with a view to promoting sustainable development.
- 2.2 Sustainability Appraisal (SA) is a process that similarly investigates plans and policies, including consideration of socio-economic factors in the same way as environmental factors and to the same level of detail. SA incorporating SEA is a mandatory requirement for Local Plans in accordance with planning legislation and paragraph 32 of the National Planning Policy Framework¹ (revised July 2021). Government advises that an integrated approach is taken so that the SA process incorporates the requirements for SEA – and to the same level of detail².
- 2.3 There is no statutory requirement for Neighbourhood Plans to be subject to SA. However, a qualifying body must demonstrate how its plan will contribute to achieving sustainable development. Legislation³ requires Neighbourhood Plans to meet a series of 'basic conditions', including that they must:
 - be appropriate having regard to national policy and guidance;
 - contribute to the achievement of sustainable development;

¹ MHCLG (July 2021), National Planning Policy Framework, available at: [National Planning Policy Framework - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/91262/nppf-2021.pdf)

² [Planning Practice Guidance](#) Paragraph: 007 Reference ID: 11-007-20140306

³ Paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990, as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004.

- be in general conformity with the strategic policies in the Development Plan of the local area;
 - not breach, and otherwise be compatible with EU obligations (as incorporated into English law); and
 - meet and comply with prescribed matters e.g. whether or not it has a significant effect on European sites.
- 2.4 In some limited circumstances, where a Neighbourhood Plan is likely to have significant environmental effects on the environment, it may require a SEA. This is determined through a SEA screening process by the 'responsible authority' with regard to the SEA Directive and UK SEA Regulations – for this Neighbourhood Plan, this is Runnymede Borough Council (RBC).
- 2.5 Neighbourhood Plans may also require assessment in relation to the Habitats Regulations 2017. The aim of the Habitats Regulations Assessment (HRA) process is to assess the potential effects arising from a plan against the nature conservation objectives of any site designated for its nature conservation importance. The HRA process has its own legislative drivers and requirements and, while the different processes can inform each other, it is important that the HRA remains distinguishable from the wider SA/SEA process. However, if an appropriate assessment is required then this will engage the need for a SEA.

The Runnymede 2030 Local Plan

- 2.6 Runnymede Borough Council (RBC) has prepared a Local Plan (adopted July 2020) to guide future development in the Local Authority area during the period to 2030⁴. In accordance with legislative and policy requirements, the Council carried out a Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) of its Local Plan. The SA/SEA and HRA of the Local Plan was undertaken alongside the preparation of the plan with SA/SEA and HRA Reports published as evidence to support each stage of plan-making.
- 2.7 A Neighbourhood Plan attains the same legal status as the Local Plan once it has been agreed at a referendum and is adopted or “made” (brought into legal force) by the local planning authority. At this point it becomes part of the statutory development plan. Applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise.

The SEA & HRA Screening Document

- 2.8 This document includes a screening assessment, determination and statement of reasons for the determination of the need to carry out a Strategic Environmental Assessment (SEA) and a Habitats Regulations Assessment (HRA) of the emerging Englefield Green Village Neighbourhood Plan (EGV NP), in accordance with EU Directives, as incorporated into English law. Runnymede Borough Council (RBC), as the “Responsible Authority” under the SEA Regulations, and the “Competent Authority” under the HRA Regulations, is responsible for undertaking the screening process that determines if the Neighbourhood Plan is likely to have any significant environmental effects and therefore, whether an SEA and an HRA is required.

⁴ Full details are available on the Council's website at: [Runnymede 2030 Local Plan and review – Runnymede Borough Council](#)

- 2.9 Before the final determination was made, the assessment set out in this document and the draft neighbourhood plan materials were sent to the environmental consultation bodies (Environment Agency, Historic England & Natural England) for the statutory 5 weeks consultation period finishing on Friday 29 July 2022.

3. Legislative Requirements and Guidance, and Methodology

Legislative Requirements

- 3.1 A Neighbourhood Plan must be compatible with European Union (EU) obligations, as incorporated into UK law, in order to be legally compliant. Directive 2001/42/EU on the assessment of the effects of certain plans and programmes on the environment (often referred to as the Strategic Environmental Assessment (SEA) Directive) seeks to provide a high level of protection of the environment by integrating environmental considerations into the process of preparing plans. The SEA Directive is transposed into English law through the Environmental Assessment of Plans and Programmes Regulations (the 'SEA Regulations'). Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (often referred to as the Habitats Directive) ensures the conservation of a wide range of rare, threatened or endemic animal and plant species. This Directive is implemented in England through the Conservation of Habitats and Species Regulations 2017 (as amended) (the 'Habitat Regulations').
- 3.2 Following the UK's withdrawal from the EU on 31 January 2020, the Regulations, which previously implemented the requirements of the EU Directives in England, continue to apply as before unless and until new legislation is introduced. Part 5 of The Levelling Up and Regeneration Bill⁵ provides the Secretary of State power to replace the SEA and HRA regimes with alternative measures. However, the Bill is currently progressing through the House of Lords and any amendments to the environment assessment process have not yet been agreed. Until any legislative changes are made, the existing Regulations will continue to be applied.
- 3.3 Regulation 5 of the SEA Regulations requires an environmental assessment of plans which:
- 1. are prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use (Regulation 5, para. (2)(a), **and** which set the framework for future development consent of projects listed in Annex I or II to Council Directive 85/337/EEC (EIA Directive) on the assessment of the effects of certain public and private projects on the environment (Regulation 5, para. (2)(b)*
 - 2. in view of the likely effect on sites, have been determined to require an assessment pursuant to Article 6 or 7 of the Habitats Directive (92/43/EEC) (Regulation 5, para. (3)*
 - 3. set the framework for future development consent of projects⁶ (Regulation 5, para. (4)(b)*

⁵ The Levelling-up and Regeneration Bill is available at: [Levelling-up and Regeneration Bill - Parliamentary Bills - UK Parliament](#)

⁶ European Commission guidance states that plans and programmes which set the framework for future development consent of projects would normally contain 'criteria or conditions which guide the way a consenting authority decides an application for development consent'. Development consent is defined in the EIA Directive as "the decision of the competent authority or authorities which entitled the developer to proceed with the project" (Article 1(2) of the EIA Directive).

4. are determined to be likely to have significant environmental effects as determined under regulation 9(1) (Regulation 5, para. (4)(c)

3.4 An environmental assessment need not be carried out for:

a) plans which determine the use of a small area⁷ at local level (Regulation 5, para. (6)(a); or

b) plans which are a minor modification⁸ to a plan or programme (Regulation 5, para. (6)(b) unless it has been determined under regulation 9(1) that the plan is likely to have significant environmental effects.

3.5 UK Government guidance provides a flow diagram with questions/criteria for the SEA Directive and its application to the plan-making process as illustrated in Figure 1. It does not have any legal status.

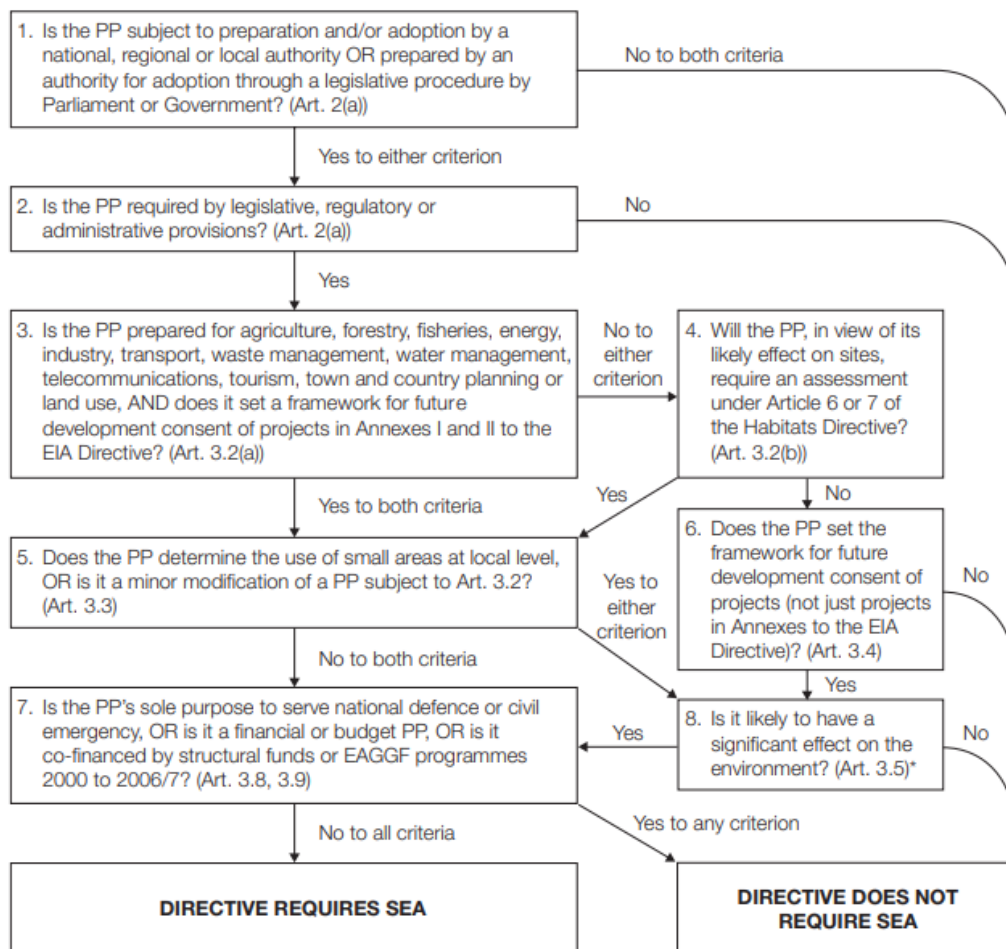


Figure 1: Flow diagram for determining if a plan is likely to have Significant Environmental Effects. Source: 'A Practical Guide to the SEA Directive' 2005. PP refers to plans and programmes.

⁷ European Commission guidance suggests that plans which determine the use of small areas at local level might include "a building plan which, for a particular, limited area, outlines details of how buildings must be constructed, determining, for example, their height, width or design"

⁸ 'Minor modifications' should be considered in the context of the plan or programme which is being modified and of the likelihood of their having significant environmental effects. A modification may be of such small order that it is unlikely to have significant environmental effects.

- 3.6 There is no legal requirement for a Neighbourhood Plan to have a Sustainability Appraisal⁹ as set out in section 19 of the Planning & Compulsory Purchase Act 2004. Government advises that in some limited circumstances, where a Neighbourhood Plan is likely to have significant environmental effects, it may require a Strategic Environmental Assessment. In order to decide whether a draft NP might have significant environmental effects, it must be screened at an early stage according to the requirements set out in regulation 9 of the SEA Regulations. This includes a requirement to consult with the SEA consultation bodies (in England - Environment Agency, Historic England, Natural England); each body can advise on particular topics relevant to its specific area of expertise and responsibility.

Guidance on SA/SEA & HRA

- 3.7 The National Planning Policy Framework (NPPF) and Planning Practice Guidance (NPPG) have advised that a Neighbourhood Plan:
- would need SEA "...in limited circumstances...";
 - should be screened early;
 - screening should consult with the consultation bodies; and
 - if 'screened out', should have a 'statement of reasons' prepared.
- 3.8 Whether a Neighbourhood Plan proposal requires a SEA, and (if so) the level of detail needed, will depend on what is proposed. Planning practice guidance¹⁰ describes how an SEA may be required, for example, where:
- a neighbourhood plan allocates sites for development;
 - the neighbourhood area contains significant environmental constraints, such as, for example, an AONB, World Heritage Site, SSSI or has large concentrations of heritage assets, which may be affected by the proposals in the plan;
 - the neighbourhood plan is likely to have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan.
- 3.9 Government planning guidance further advises that before deciding whether significant environmental effects are likely, the local planning authority should take into account the criteria specified in Schedule 1¹¹ to the SEA Regulations (2004) and consult the statutory environmental consultation bodies. Schedule 1 sets out the criteria for determining likely significant effects on the environment taking into account the characteristics of plans and the characteristics of the effects and the area likely to be affected.
- 3.10 The qualifying body (i.e. RBC for the EVG NP) is required to provide the following – to demonstrate that the basic condition¹² in the planning legislation has been met:
- "a statement of reasons for a determination....that the proposal is unlikely to have significant environmental effects; or
 - An environmental report".

⁹ Planning Practice Guidance Paragraph: 026 Reference ID: 11-026-20140306. [Strategic environmental assessment and sustainability appraisal - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal)

¹⁰ Planning Practice Guidance Paragraph: 046 Reference ID: 11-046-20150209 [Strategic environmental assessment and sustainability appraisal - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal)

¹¹ [The Environmental Assessment of Plans and Programmes Regulations 2004 \(legislation.gov.uk\)](https://www.legislation.gov.uk/uksi/2004/1633/schedule-1)

¹² A Neighbourhood Plan should no breach, and must be compatible with, European Union obligations in order for it to be legally compliant.

- 3.11 Planning practice guidance¹³ also provides advice on HRA screening and the subsequent appropriate assessment stage of the process for neighbourhood planning. An appropriate assessment for a more strategic plan, such as the Local Plan, can consider the impacts on sites and confirm the suitability or likely success of mitigation measures for associated non-strategic policies and projects. An individual assessment of non-strategic policies and projects may not be necessary in some limited cases where the strategic appropriate assessment is sufficiently robust. This needs to contain conclusions capable of removing all reasonable scientific doubt on the impacts of non-strategic policies, such as in neighbourhood plans.

Methodology

- 3.12 In order to be able to decide whether a SEA will be required, the Council needs to know about the policies and proposals in the Neighbourhood Plan, and in particular, as follows:
- how they might affect the environment, community, or economy;
 - whether they propose a higher level of development than is already identified in the 2030 Local Plan planning policies;
 - whether any of the proposals are likely to affect a “sensitive area”, such as a Site of Special Scientific Interest (SSSI) or designated European site for nature conservation (Special Area of Conservation (SAC), Special Protection Area (SPA));
 - whether implementation of policies in the plan might lead to new development in the future;
 - whether the cumulative impact of the policies and proposals when assessed together may give rise to a likely significant effect, for example, several relatively small housing proposals may have cumulative significant effects on a nearby important wildlife habitat.
- 3.13 Available information, for example, from the Council’s Geographic Information System datasets, Environment Agency flood risk maps, the Council’s evidence base for the 2030 Local Plan, and the evidence base for the EGV NP, together with professional judgment, was used to identify the sensitivity of the Englefield Green Village area’s environment and whether significant effects are likely that have not been previously assessed through SA, such that an SEA would be required, and whether an HRA/Appropriate Assessment is necessary.

4. The Englefield Green Village Neighbourhood Plan (EGV NP)

Context

- 4.1 The Englefield Green Village Neighbourhood Forum (the ‘Forum’) is the qualifying body designated for the purposes of preparing the EGV NP who have approved the draft plan for submission to RBC for SEA/HRA screening. The Englefield Green Village Neighbourhood Area (the ‘Neighbourhood Area’) consists of, with minor exceptions, the wards of Englefield Green East and Englefield West. It extends from Royal Holloway, University of London in the east to Savill Gardens in the west, and from Egham Wick in the south to the Runnymede Meadows next to the River Thames in the north. The area is shown in Figure 2.

¹³ Planning Practice Guidance Paragraph: 008 Reference ID: 65-008-20190722 [Appropriate assessment - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/appropriate-assessment)

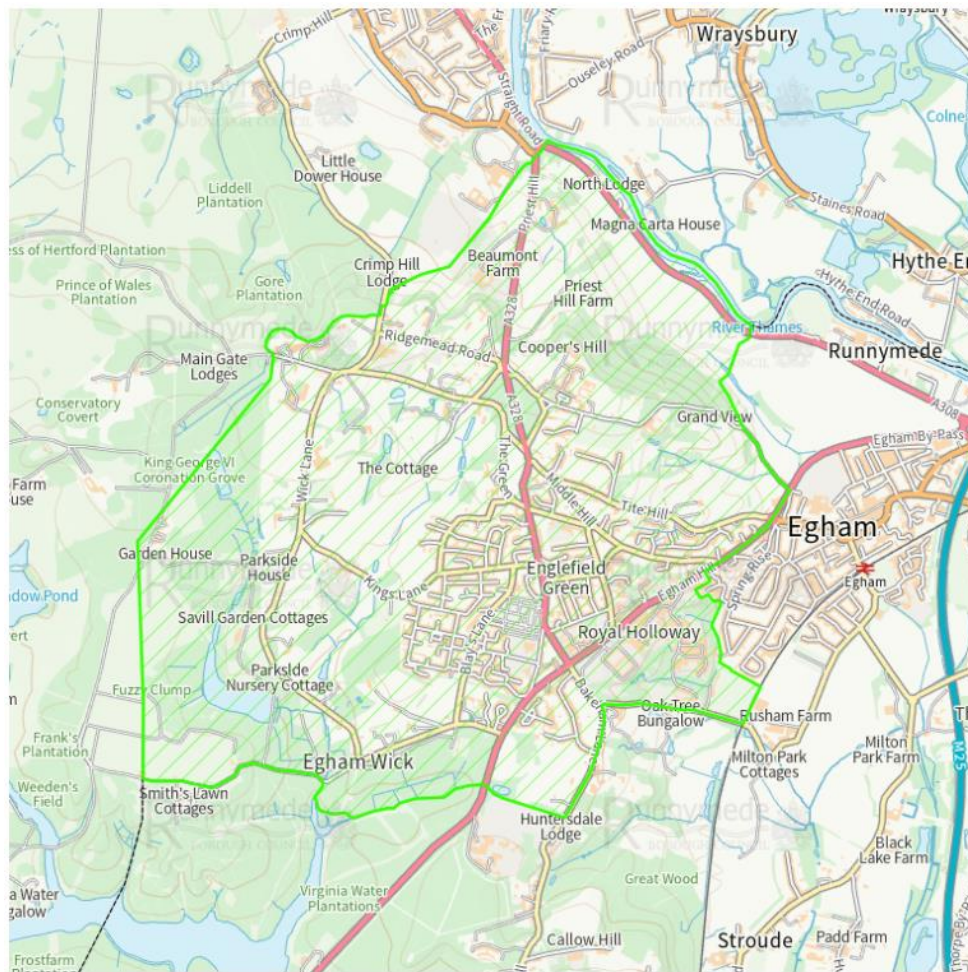


Figure 2: Englefield Green Neighbourhood Area. Crown copyright and database rights 2021
Ordnance Survey 1000006086

- 4.2 The EVG NP must be in general conformity with the strategies policies set out in the Runnymede 2030 Local Plan. Englefield Green is designated as a 'local centre', which meets the day to day needs of the local community that it serves. Lower levels of growth are expected to be accommodated within the local centre of Englefield Green, which is anticipated to come forward through redevelopment in the urban area and on urban extensions, with limited scope for additional retail and employment development.
- 4.3 The spatial distribution of growth over the period of the Local Plan (2015-2030), as set out in policy SD1, is for Englefield Green to accommodate around 611 net additional dwellings (including 192 completions and 198 dwellings deriving from the provision of C2 older people's accommodation and surplus student accommodation); and 3315 student bedspaces. This will be delivered in part on land allocated at Blay's House, Blays Lane (on the southern side of Englefield Green), for a minimum of 100 dwellings. A large proportion of the Neighbourhood Area is located within the Green Belt such that national policies apply, further supported by Runnymede 2030 Local Plan Green Belt policies. Monitoring indicates that 367 dwellings have been completed between 2015 and 2021, mainly through windfall development consisting of small-scale redevelopments. No planning application has been submitted to date for land at Blay's House.
- 4.4 The policies and quantum of growth of the Runnymede 2030 Local Plan, including those referred to above which affect Englefield Green Village Neighbourhood Area, were comprehensively assessed for their environmental and sustainability effects through the

Sustainability Appraisal (incorporating SEA) (various documents from 2018-2020) and the Habitats Regulations Assessment (April 2018)¹⁴.

- 4.5 The EGV NP must also be in general conformity with the Surrey County Council's (SCC) Minerals¹⁵ and Waste¹⁶ Local Plans. Areas to the north-east and to the west of the urban area have been designated as Mineral Safeguarding Areas for concreting aggregate. Policy MC6 of the Minerals Plan 2011 Core Strategy seeks to prevent sterilisation of these resources by other development. Local planning authorities should work with the MPA to ensure that new development does not prejudice land safeguarded to protect minerals resources. Safeguarding is a material planning consideration but does not rule out alternative development. SCC is preparing a new Minerals and Waste Local Plan to provide an up to date minerals and waste planning framework for a period of 15 years. An Issues and Options public consultation has taken place as the first formal stage of the plan-making process. A 'Preferred Options' consultation is due to take place later this year.
- 4.6 The SEA and HRA screening was carried out on a pre-submission draft EGV NP dated June 2022. This report sets out the screening assessments and decisions to demonstrate that due processes have been followed in line with regulatory requirements.

The draft Englefield Green Village Neighbourhood Plan

- 4.7 Chapters 1-6 of the EGV NP comprise an introduction and context-setting, a description of the area, a description of consultation exercises undertaken, an assessment of opportunities and constraints, and the vision and aims of the plan. The overall vision for the EGV NP is that over the plan period, the policies and aspirations in the NP will have:

- Helped shape the development of the Area in a sustainable way and create a more attractive and a better place to live, work and visit.
- Helped to develop a sense of community and identity in Englefield Green Village.
- Helped to protect the historic aspects of the Area while developing a modern character fit for the future and to the benefit of residents and visitors.
- Helped to preserve the rural aspects of the areas surrounding the urban centres.

- 4.8 The EGV NP aims are as follows:

¹⁴ Available on the Council's website: [Planning policy – Runnymede Borough Council](#)

¹⁵ Available on Surrey County Council's website: [Surrey Minerals Plan Core Strategy Development Plan Document 2011 - Surrey County Council \(surreycc.gov.uk\)](#)

¹⁶ Available on Surrey County Council's website: [Surrey Waste Local Plan 2019-2033 - Surrey County Council \(surreycc.gov.uk\)](#)

Neighbourhood Plan Aims	
1	To ensure that all new development is well-designed, sympathetic and sustainable and enhances the character and function of Englefield Green.
2	To respond to housing needs by supporting suitable housing for people of all ages and means.
3	To identify and support measures to develop the identity of the centre of Englefield Green Village.
4	To preserve and enhance Englefield Green's Village Green, Conservation Area and Victorian middle, and preserve heritage assets (whether listed or not).
5	To protect the rural aspect of the countryside outside of the urban areas and preserve special views.
6	To protect, enhance and where possible add to the green and blue infrastructure and to encourage the planting of trees within the urban area.
7	To support protect and enhance the social assets, community facilities and services (including schools and healthcare, leisure and recreation) to meet residents' needs.
8	To support existing local businesses and encourage new small and medium-sized businesses and shops which provide sustainable employment opportunities and enable people to shop locally.
9	To identify and support appropriate infrastructure developments which reflect the community's needs and keep it an attractive, well-planned and safe place for everyone.
10	To identify and support measures which improve traffic management including parking and speed control measures.
11	To identify and support measures to encourage walking, cycling and other sustainable forms of transport as means of fulfilling shorter journeys.
12	To ensure that the development of Royal Holloway University of London is in harmony with the development of the surrounding urban and rural areas.

4.9 Chapter 7 defines what 'sustainable development' means for the Englefield Green Village community, and Chapter 8 onwards set out a series of land use policies covering the following themes:

- **New development policies** (ND1 to ND5):
 - Policy ND1 supports new development on infill or redevelopment sites inside the Urban Area and identifies potential impacts which should be overcome;
 - Policy ND2 supports the delivery of 'First Homes' to boost the supply of affordable housing in the area;
 - Policy ND3 supports development at the Blays Lane/Wick Road site (allocated in the 2030 Local Plan) provided proposals are in accordance with the design vision, concept and principles set out in the Englefield Green Village Masterplans document and the Design Codes. Policy SL5 of the 2030 Local Plan allocates the land for a minimum of 100 dwellings and the EGV NP has demonstrated how this could best be achieved through good design. The design codes are set out under six headings: mobility; character; environment and landscape; community; housing; and sustainability;
 - Policy ND4 supports proposals for the redevelopment of the Coopers Hill site provide they are in accordance with the quantum of development, design concept and layout set out in the Englefield Village Green Masterplans document and the Design Codes. Neither the 2030 Local Plan nor the EGV NP allocate the land for development, and it continues to be washed over by the Green Belt. Any new or redevelopment on the site would therefore be subject to higher tier national (NPPF) and local planning (2030 Local Plan) policies on what constitutes appropriate development in the Green Belt. The site currently features

accommodation for approximately 400 students housed in a collection of historic and more recently constructed buildings.

- Policy ND5: supports new development where it is of high design quality, supported by Design Codes covering mobility; character; environment and landscape; community; housing; sustainability;
- Policy ND6: sets out the sustainable design and construction criteria under which new development proposals will be supported.
- **Character of the rural setting policies (C1-C2):** new development is required to retain the rural character of the setting of the village; and policy identifies views of particular importance which should be preserved and not obstructed by new development;
- **Historic environment (HE1-HE2):** policies provide criteria which should be considered for development proposals on sites in the Conservation Area; and identify local heritage assets and settings which should be taken into account by development proposals;
- **Natural environment (NE1-NE3):** policies set out how development proposals must be accompanied by a green and blue infrastructure plan, describing how infrastructure will be enhanced, gains in biodiversity will be achieved, and connectivity improved (supported by a Biodiversity Report identifying key corridors and opportunity areas). Policies introduce a 15m buffer for the protection of designated sites, habitats of principal importance and habitats for species of principal importance. Promotes the incorporation of natural sustainable drainage solutions; encourages provision of new trees, hedgerows and planting; and resists the loss of mature trees.
- **Community facilities (CF1-CF2):** policies identify specific community facilities to be retained and their loss resisted; encourage provision of new facilities; and identify a series of Local Green Spaces which will be protected from new development unless very special circumstances can be demonstrated.
- **Employment and services (ES1-ES3):** encourages proposals for the development of new businesses and expansion or diversification of existing businesses provided certain criteria are met, and supports retail development in the primary and secondary shopping frontage within the centre. Sets out circumstances under which changes of use and/or loss of Class E uses will be acceptable. Seeks to retain historic shopfronts and encourage new shopfronts in keeping with character. Loss of public houses will be resisted.
- **Infrastructure provision (I1):** identifies local infrastructure schemes which will be considered through S106/CIL contributions or via other means, to support development.
- **Traffic and transport (TT1-TT3):** policies which aim to alleviate parking congestion, and improve active travel choice through provision of bicycle/mobility aid storage facilities and enhanced pedestrian/cycle/horserider infrastructure.
- **Royal Holloway University of London (RHUL1):** supports sustainable development of RHUL campus in accordance with its masterplan provided proposals are in accordance with the Englefield Green Design Codes.

4.10 Chapter 17 sets out the aspirations for place-making to work towards using CIL or S106 funds (or other means), and implementation and monitoring procedures. The plan is supported by maps and appendices. The EGV NP has not allocated sites for future housing development beyond the site already identified in the 2030 Local Plan, because there is no specific expectation or requirement in the Local Plan to allocate additional housing in the Neighbourhood Area.

4.11 It should be noted that some information was not provided within the early draft EGV NP version submitted for screening purposes. The 'views of particular importance' (subject

to policy C2) were not supplied; policies maps were under development; and some of the evidence base was being finalised. However, all of the draft policies were sufficiently detailed, supported by information on the EGV Forum website, to inform the screening determination in the absence of this information. A further draft EGV NP was supplied to the Council in February 2023 ahead of submission, and no substantive changes had been made to any of the policies to warrant further assessment.

5. SEA Screening Assessment

5.1 Runnymede Borough Council (RBC), as the responsible authority, considers that the EGV NP is within the scope of the SEA Regulations since it is a plan that:

- is subject to preparation or adoption by an authority at local level (Regulation 2¹⁷)
- is prepared for town and country planning or land use and it is a plan that sets the framework for future development consent of projects generally (Regulation 5, para.4)
- will apply to a wider area other than a small area at local level and is a minor modification to an existing plan or programme (Regulation 5, para.6).

A determination under Regulation 9 is therefore required as to whether EGV NP is likely to have significant effects on the environment.

5.2 The first step is to assess the plan against the flowchart in Figure 1 to establish the need for SEA. The following table illustrates the findings.

Stage	Y/N	Reasoning
1. Is the PP (plan or programme) subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Art. 2(a))	Y	The EGV NP is not a Development Plan Document (DPD), however if the document received 50% or more 'yes' votes through a referendum it will be adopted by Runnymede Borough Council. The preparation and adoption process is prescribed by the Town and Country Planning Act 1990 as amended by the Localism Act 2011. The preparation of the EGV NP is also subject to a number of Regulations. Go to stage 2
2. Is the PP required by legislative, regulatory or administrative provisions? (Art.2(a))	N (/Y)	Communities have a right to be able to produce a neighbourhood plan, however communities are not required by legislative, regulatory or administrative purposes to produce a neighbourhood plan. This plan however if adopted would form part of the statutory development plan, therefore it is considered necessary to answer the following questions to determine further if an SEA is required. Go to stage 3
3. Is the PP prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, AND does it set a framework for	Y	The EGV NP is prepared for town and country planning and land use and does set out a framework for future development in the Englefield Green Village Neighbourhood Area, including Infrastructure development which may fall under no.10 of Annex II of the EIA directive

¹⁷ Of the Environmental Assessment of Plans and Programmes Regulations 2004, available at: [The Environmental Assessment of Plans and Programmes Regulations 2004 \(legislation.gov.uk\)](https://www.legislation.gov.uk/uksi/2004/1631/contents/make)

future development consent of projects in Annexes I and II to the EIA Directive? (Art 3.2(a))		(for example, for potential social/community infrastructure, which may fall under 'urban development project'). Go to Stage 5
4. Will the PP, in view of its likely effect on sites, require an assessment for future development under Article 6 or 7 of the Habitats Directive? (Art. 3.2 (b))	N	See HRA Screening below.
5. Does the PP determine the use of small areas at local level, OR is it a minor modification of a PP subject to Art. 3.2? (Art.3.3)	Y	The EGV NP does not determine the use of an area of land; but for the purposes of the SEA Regulations, the plan does effectively make minor modifications to the Councils' 2030 Local Plan by building on the planning policies contained within it. Go to Stage 8
6. Does the PP set the framework for future development consent of projects (not just projects in annexes to the EIA Directive)? (Art 3.4)	Y	The EGV NP sets policies which planning applications within the Neighbourhood Area must take account of. Go to Stage 8
7. Is the PP's sole purpose to serve the national defence or civil emergency, OR is it a financial or budget PP, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7? (Art 3.8, 3.9)	N	None of these apply.
8. Is it likely to have a significant effect on the environment? (Art. 3.5)	N	The EGV NP is unlikely to have any significant effect on the environment – see Table 2 for the detailed assessment which supports this conclusion.

Table 1: SEA Screening Step 1

5.3 The second step is to consider whether the EGV NP will have significant environmental effects when considered against criteria set out in Schedule 1 of the Regulations. The screening requirements set out in Regulation 9 and Schedule 1 of the SEA Regulations include two sets of characteristics for determining the likely significance of effects of the environment:

- the characteristics of the plan itself and
- the characteristics of the effects and of the area likely to be affected by the plan.

Therefore, this screening assessment is structured in the following table (Table 2) according to the criteria specified in Schedule 1 of the Regulations.

Criteria (Schedule 1 SEA Regulations)	Likely to have significant effects? (Yes/No)	Justification and evidence
• The characteristics of plans, having regard, in particular, to:		
(a) the degree to which the plan sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources	No	The EGV NP will set out a vision and a number of aims to shape future development in the Englefield Green Neighbourhood Area for the period to 2030. A number of planning policies have been formulated to help deliver the vision and aims. The EGV NP would, if made, form part of the statutory Development Plan and, as such, does contribute to the framework for future development consent of projects. However, the EGV NP will sit within the wider framework of the National Planning Policy

		<p>Framework, the adopted 2030 Local Plan, and the Surrey Minerals and Waste Local Plans. It will supplement policies in these Plans, which have been subject to full Sustainability Appraisal (found to be robust at an Examination in Public). The EGV NP does not propose development in excess of that identified in the Local Plans, and does not propose allocation of sites for development, thus the degree to which the plan sets a framework for new development projects is limited. Whilst the EGV NP does seek to influence new development through various policies, the projects for which the EGV NP helps to set a framework is very localised in nature and may have limited resources implications.</p>
(b) The degree to which the plan or programme influences other plans and programmes, including those in a hierarchy	No	<p>The EGV NP is prepared by the local community to influence development at the neighbourhood level. The EGV NP forms the lower tier of the hierarchy of land-use plans and as such is influenced by the strategic policies of the adopted 2030 Local Plan. It does not strongly influence strategic plans higher up in the spatial planning hierarchy, although the Borough Council does need to consider the proposals in the NP during the preparation of any future, revised Local Plan. The degree of influence is not such that it would lead to significant environmental effects.</p>
(c) The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development	No	<p>The basic conditions require a neighbourhood plan to contribute to the achievement of sustainable development. The EGV NP contains a series of sustainable development principles which it seeks to promote through policies which are intended to have a positive impact within the neighbourhood area: for example, by protecting and enhancing open spaces and sites of environmental and historical significance, protecting and enhancing community facilities, supporting the delivery of high quality, sustainably constructed buildings, and supporting existing employment uses. The EGV NP seeks to prevent development that would be harmful to the natural environment. In addition, the NP supports development that seeks to mitigate environmental issues relating to traffic.</p> <p>Although the EGV NP seeks to promote the principles of sustainable development, it is not specifically relevant as a plan for integrating environmental considerations. Any development proposed must be in accordance with the environmental protection policies in the adopted 2030 Local Plan and the NPPF.</p> <p>The positive environmental effects expected to result from the EGV NP are not considered to be 'significant' as per the SEA Regulations and a 'No' response is therefore appropriate.</p>
(d) Environmental problems relevant to the plan or programme	No	<p>Implementation of the EGV NP policies will not result in any significant environmental problems. Indeed, the EGV NP should have a positive impact through the inclusion of, for example, policies which seek to protect/enhance the natural and built environment and improve biodiversity. The EGV NP does not allocate</p>

		<p>sites or propose development that would give rise to environmental problems.</p> <p>There are no specific environmental problems relevant to the NP that have not been identified in the higher-level Local Plan and its accompanying SA/SEA.</p>
(e) The relevance of the plan for the implementation of [European] Community legislation on the environment (for example, plans and programmes linked to waste management or water protection)	No	The EGV NP is not relevant as a plan for implementing Community legislation. Issues such as waste management and water protection are addressed by other plans in the Development Plan framework, which take account of relevant Community legislation for environmental protection. The EGV NP provides additional support for the effective implementation of this higher tier policies at the neighbourhood level.
<p>• Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:</p>		
(a) The probability, duration, frequency and reversibility of the effects	No	This has been tested through the SA/SEA at Local Plan level and with strong mitigation measures through Local Plan policies, the SA/SEA concluded that there will be no significant residual negative environmental effects. The EGV NP does not propose allocation of sites for development projects. Whilst the EGV NP does cover areas that are a national designation for cultural heritage, nature conservation and Green Belt / landscape, no likely significant adverse effects have been identified.
(b) The cumulative nature of the effects	No	As above in 2(a)
(c) The transboundary nature of the effects	No	No significant transboundary effects with other EU countries are likely from the proposals.
(d) The risks to human health or the environment (for example, due to accidents)	No	No significant negative environmental effects are considered likely to risk 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 EGV NP does not propose allocation of sites for development projects. The geographical size of the plan area is small, and the size of the population is small at around 10,600 permanent residents plus an estimated 5,000 semi-permanent students living within the community. Therefore, there are no significant adverse effects identified.
(f) The value and vulnerability of the area likely to be affected due to – i) special natural characteristics or cultural heritage; ii) exceeded environmental quality standards or limit values; or iii) intensive land-use	No	<p>As above. No likely significant negative effects on locally important characteristics – the EGV NP does not propose allocation of sites for development projects.</p> <p>The Neighbourhood Area to which the NP applies contains several locally and nationally important natural characteristics and cultural heritage, including: Windsor Forest and Great Park (Special Areas of Conservation, Sites of Nature Conservation Importance (SNCI), Site of Special Scientific Interest (SSSI), Biodiversity Opportunity Area and Park and Garden of Special Historic Interest); Runnymede Meadows and Slope (Biodiversity Opportunity Area, Runnymede SNCI (including Cooper's Hill and Cooper's Hill Slopes); Langham Pond SSSI; The Royal Holloway University (Grade I) and one other Grade I listed building; Commonwealth Air Forces Memorial (Grade II*) and 55 Grade II buildings and structures, including the Kennedy</p>

		<p>Memorial, St John's College Beaumont, the Cumberland Obelisk and Magna Carta Monument; Englefield Green Conservation Area to the north of the village; and A number of other locally listed and non-designated heritage assets and valued green spaces and landscapes, including areas of Ancient Woodland outside the urban area. The most significant green space within the urban area is the Green.</p> <p>Some of these assets form the broader Thames Valley Biodiversity Opportunity Areas which make up Surrey's ecological network and contain a number of priority species and habitats. The condition of these areas is summarised in Appendix 1.</p> <p>The River Thames runs to the north east of the Neighbourhood Area, in Englefield Green West ward, and the Ripley Springs Watercourse runs to the east the Area, in Englefield Green East ward. The north east corner of the Area is in flood zone 3 due to its proximity to the River Thames. There are two small areas in zone 3 which could be affected by surface water flooding to the south of the Area. For the majority of the Urban Area within the Neighbourhood Area, flooding is not a major consideration.</p> <p>The Thames Basin Heaths Special Protection Area (TBH SPA) supports importance species and habitats, including vulnerable ground nesting birds. Most of the urban area lies within the 5km to 7km of the TBH SPA – any new development projects will need to consider mitigation measures to protect its Thames Basin Heath habitat (as required by Policy EE10 of the 2030 Local Plan).</p> <p>The South West London Waterbodies SPA, also designated as a Ramsar site, lies within 1km of the north east boundary of the Neighbourhood Area. The River Thames forms the boundary of the Neighbourhood Area to the north east. The EU Water Framework Directive (WFD) requires all surface water bodies and groundwater bodies in the UK to be in good ecological and chemical status by 2027. Recent trends in the ecological status of waterbodies within Runnymede are either in moderate or poor status with many declining over time and none improving. Reasons for this include sewage discharge and drainage from agriculture/transport or physical modifications. This could make the area to the north west of the Neighbourhood Area vulnerable to further new development, but Green Belt and flood risk constraints prevent inappropriate new development in this area, supported by policies in the National Planning Policy Framework, the 2030 Local Plan (the effects of which have been comprehensively assessed as part of its SA/SEA), and supported by the policies and Design Codes of the EGV NP.</p>
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		<p>The EGV NP is not within any area that has exceeded environmental quality standards, for example, it is not within an Air Quality Management Area (AQMA).</p> <p>The EGV NP aims to protect and where possible enhance the Area's special natural characteristics and cultural heritage. Its policies, supported by Design Codes, seek to ensure that new development mitigates any detrimental effects that they impose on both the natural environment (including pollution, air quality, noise, land contamination, flooding) while enhancing existing landscape features and promoting habitat creation and connectivity; and on the historic environment. Thus policies in the EGV NP alongside policies in higher tier plans will ensure that any effect is unlikely to have a significant impact on any special natural characteristics or cultural heritage. Future proposals will be assessed against policies within the Development Plan which, in totality, mitigate against the over-development of land within the Neighbourhood Area.</p>
(g) The effects on areas of landscapes which have a recognised national, Community or international protection status.	No	<p>The EGV NP area is washed over by the Green Belt and nationally protected. The Green Belt is made up of open landscape, historic parks, and mansions with large grounds. The EGV NP reiterates requirements of higher tier plans and their policies which consider the majority of development projects to be inappropriate in the Green Belt and are only approved in very special circumstances. Policy C1, supported by Design Codes, supports policies in Development Plan by ensuring that forms of development which are potentially considered to be not inappropriate in the Green Belt (including the redevelopment of previously developed land at the Coopers Hill site) preserve its openness and do not conflict with the purposes of including land within it.</p> <p>There are many nationally important heritage assets within the Neighbourhood Area including Savill Gardens (Grade I listed), Runnymede Park and the Commonwealth Air Forces Memorial at Coopers Hill (Grade II* listed), and some 55 Grade II listed buildings and structures. The extent of the Green and neighbouring areas are designated for their national importance as a Conservation Area. Historic assets and their settings are protected by the higher tier 2030 Local Plan policies EE3, EE4, EE5, EE6, EE7 and EE8, supported by a Design Supplementary Planning Document which sets out how applicants should take heritage assets into account in their development proposals.</p> <p>There are no Special Protection Areas (SPAs) or Ramsar sites within the Neighbourhood Area to which the NP applies, but the Thames Basin Heaths SPA (TBH SPA) is 5-7km south west of the Englefield Green Urban Area; and the South West London Waterbodies SPA and Ramsar site lies 2-3km to the north east of the Englefield Green Village Urban Area (where new and redevelopment is supported). The internationally protected Windsor Great Park Special Area of</p>

		<p>Conservation (SAC) is largely located outside the Borough, but a small portion of it lies within the Neighbourhood Area boundary to the west. Appendix 1 identifies the important habitats and species accommodated at this site.</p> <p>Policy EE9 of the higher tier 2030 Local Plan on Biodiversity, Geodiversity and Nature Conservation refers to these important sites in the Borough and ensures there is embedded mitigation in place. Policy EE10 of the 2030 Local Plan sets out how new development, including within the Neighbourhood Area, will need to put in place adequate measures to avoid and mitigate potential adverse effects on the TBH SPA and/or bespoke Appropriate Assessment for development proposals may be required to determine whether there will be a likely impact on the integrity of the SPA.</p> <p>Policy NE2: Biodiversity of the EGV NP seeks to provide an additional layer of protection for statutory and non-statutory designated sites within the Neighbourhood Area, supported by Design Codes which cover the conditions that new property developments within the Area should respond to as part of the redevelopment of large higher-end estates within the Green Belt which may impact upon designated sites.</p> <p>There are no National or Local Nature Reserves (LNR or NNR) located near to the Neighbourhood Area. The countryside surrounding the Urban Area contains two significant areas of designated habitat and species: to the north east are Langham Pond SSSI which supports a wide diversity of aquatic and waterside plants, including several rare species, surrounded by the grasslands of Runnymede SNCI (including Cooper's Hill and Cooper's Hill Slopes). These form part of the wider Biodiversity Opportunity Area TV02: Runnymede Meadows and Slope. Priority habitat includes mixed deciduous woodland, meadows, wood pasture and parkland and ponds. Priority species include a variety of plants, fungi/lichens, invertebrates and vertebrates. Langham Pond SSSI is in Favourable condition. Within the countryside surrounding the Urban Area to the west and south west is the Windsor Great Park SNCI and a small site of Windsor Forest SSSI (within the wider SAC). These form part of the wider Biodiversity Opportunity Area TV01: Windsor Great Park. Priority habitats include wood pasture and parkland, mixed deciduous woodland (including Ancient Woodland), wet woodland, fen, heathland, acid grassland and standing open water. Priority species include a variety of plants, fungi/lichens, invertebrates and vertebrates. This SSSI is also in Favourable condition.</p> <p>Policy EE9 of the 2030 Local Plan seeks to avoid loss, deterioration, or harm to nationally and locally important wildlife and habitats and net gain in biodiversity is sought from new development. Policy NE2 of the EGV NP provides additional protection for designated sites and</p>
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		<p>support for biodiversity net gains. 2030 Local Plan policies to protect water quality and resources are provided through Policy EE12: Blue Infrastructure and EE13: Managing Flood Risk. The EGV NP policies NE1-NE3 and Design Codes provide additional support to protect, maintain and enhance existing green and blue infrastructure; and to conserve priority habitats.</p> <p>The 2030 Local Plan was adopted in July 2020; it was subject to iterative SA/SEA and HRA that independent examination found to be sound. Therefore, the approach and policies in the EGV NP refer to and provide additional support for policies in the Local Plan which seek to avoid and mitigate effects on important landscapes, heritage assets and designated sites that have been previously subject to SA/SEA (and HRA), found to be sound, and adopted.</p> <p>It is considered that the 2030 Local Plan SA/SEA (and HRA) remain valid and that there is no new material or relevant information that should be considered.</p>
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Table 2: SEA Screening Step 2

6. SEA Screening Determination & Statement of Reasons

- 6.1 Regulation 9 of the SEA regulations requires that the responsible authority shall determine whether or not a plan is likely to have significant environmental effects. The responsible authority shall:
- take into account the criteria specified in Schedule 1 to these Regulations, and
 - consult the consultation bodies.
- 6.2 Where the responsible authority determines that the plan is unlikely to have significant environmental effects (and, accordingly, does not require an environmental assessment), it shall prepare a statement of its reasons for the determination.
- 6.3 Runnymede Borough Council determines that the draft Englefield Green Village Neighbourhood Plan (EGV NP) is unlikely to have significant environmental effects and thus does not require a Strategic Environmental Assessment (SEA). This decision is made for the following key reasons:
- The likely significant effects on the environment in the NP area were identified at an early stage of plan development during initial investigations for strategic options for the Local Plan – all subject to SA incorporating SEA. Mitigation measures for negative effects have been embedded in the 2030 Local Plan (adopted July 2020), which apply to development coming forward in the Englefield Green Neighbourhood Area (to which the EGV NP applies). It is recognised that the countryside surrounding the Urban Area of Englefield Green Village where important habitats and heritage assets are located is washed over by the Green Belt and thus subject to national policy constraints, reinforced by Local Plan policies. Further mitigation measures are provided through other 2030 Local Plan Policies such as EE3-EE19 inclusive - ensuring that there will be no residual significant negative effects on the natural and historic environment.
 - There will be no significant negative effects on the nationally designated and locally important environmental and cultural heritage assets and settings of the village.

- Likely significant effects have been previously assessed through SA incorporating SEA for the adopted 2030 Local Plan and therefore, further SEA of the EVG NP is not required. The EVG NP does not propose to allocate any sites for development projects, so the quantum and spatial distribution of growth is the same as that assessed by the 2030 Local Plan SA (incorporating SEA).
- There will not be any adverse effects on the integrity of European sites designated for nature conservation due to the limited size and extent of any likely development in Englefield Village Green and the distance from and/or absence of identified environmental pathways to any designated sites. Policy EE9 of the 2030 Local Plan, supported by natural environment policies and design code requirements in the draft EVG NP, specifically refer to the Windsor Great Park SAC ensuring that there is policy protection.

7. Habitats Regulations Assessment (HRA) Screening

- 7.1 A Neighbourhood Plan must be compatible with European Union (EU) obligations, as incorporated into English law, in order to be legally compliant. This section of the report has been prepared to determine whether an appropriate assessment of the EGV NP is required to secure compliance with EU Directives, as transposed into English law, which aim to protect and improve Europe's most important habitats and species. Whilst Schedule 2 of the Neighbourhood Planning (General) Regulations 2012 sets out a general presumption that a Habitats Regulations Assessment (HRA) is unlikely to be required, it is still necessary to carry out a screening assessment.
- 7.2 The EGV NP once adopted will form part of the Development Plan for Runnymede, and will be in general conformity with the strategic policies in adopted 2030 Local Plan. The 2030 Local Plan has been subject to both Strategic Environmental Assessment (integrated into the Sustainability Appraisal) and full Habitats Regulations Assessment. The HRA accompanying the submission Local Plan¹⁸ identifies a number of European (now National Network) sites that were considered for assessment, and a number of potential impact pathways including urbanisation, recreational pressure, air quality (including atmospheric pollution and nutrient enrichment), and water quality and quantity. The four European sites included in the assessment were:
- Special Protection Areas (SPA) designated under the Wild Birds Directive
 - the Thames Basin Heaths SPA;
 - the South West London Waterbodies SPA (also includes South West London Waterbodies Ramsar – one unit (Thorpe Park Gravel Pit No.1);
 - Special Areas of Conservation (SAC) designated under the Habitats Directive
 - the Windsor Forest and Great Park SAC; and
 - the Thursley, Ash, Pirbright and Chobham SAC (which lies approximately 10km away from the Neighbourhood Area boundary).
- 7.3 There are no SPAs or Ramsar sites within the Englefield Green Village Neighbourhood Area boundary, but a small portion of European designated Windsor Forest and Great Park SAC falls within the boundary to the west (situated approximately 1.3km to the west of the Urban Area within which new development proposals are supported subject to a number of criteria being met). There could be environmental pathways indicated through the drains, ponds, watercourses and roads to the west of the Neighbourhood Area. However, the value and importance of the SAC has been strongly recognised by the EGV NP such that EGV NP Policy NE2 sets out to further protect the designated sites of the Neighbourhood Area, including up-to-date identification of a green and blue

¹⁸ Available to download from: www.runnymede.gov.uk/planning-policy/runnymede-2030-local-plan

infrastructure network and biodiversity enhancement opportunity areas in a Biodiversity Report. This updated and further guidance for new development supports and extends the extant protection provided by the 2030 Local Plan policies – including Policy EE9 that specifically refers to the SAC and thus provides protection.

- 7.4 Section 2 of the Local Plan HRA states that the next nearest European site is 12km from the borough boundary and does not lie on any routes that are likely to constitute significant journey to work routes for residents of the borough.
- 7.5 None of the preferred policies or any of the preferred site allocations in the 2030 Local Plan were considered to cause likely significant effects on the Windsor Forest and Great Park SAC and the South West London Waterbodies SPA/Ramsar, so these sites were screened out from further assessment. However, likely significant effects on the Thames Basin Heath SPA and Thursley, Ash, Pirbright and Chobham SAC were identified, so these sites were taken forward to 'Stage 2' Appropriate Assessment. After further assessment, it was subsequently concluded that there would be no adverse effects on the SAC (either alone or in combination). As such, taking the lead from the Borough-wide Local Plan HRA, this HRA screens out all European (now National Network) sites other than the Thames Basin Heaths SPA. It is considered therefore that there are no pathways for effect from the EGV NP above and beyond those already considered at Borough-wide level through the Local Plan.
- 7.6 In relation to the TBH SPA, it was concluded that there would be no risk of an adverse effect on the integrity of the SPA since the Local Plan policies (specifically Policy EE10) would put in place mitigation measures to avoid harm to the SPA arising from new housing development. These measures include the provision of Suitable Alternative Natural Greenspace (SANG) and Strategic Access Management and Monitoring (SAMM) contributions. The Council has demonstrated sufficient SANG capacity for mitigation over the plan period. New development coming forward in the EGV NP area will be within the zone of influence of the SPA and will be subject to requirements in Policy EE10 of the 2030 Local Plan. The EGV NP does not allocate any sites for development, and the quantum and spatial distribution of growth is the same as that which was subject to HRA for the 2030 Local Plan.
- 7.7 The overall conclusion of the HRA report that accompanied the 2030 Local Plan¹⁹ was that the development proposed in the Local Plan will not lead to likely significant effects either alone or in-combination with other plans or programmes, with the proposed mitigation and avoidance measures embedded into Local Plan policies. The HRA studies were updated in line with recent EU Court Judgements in 2018 and confirmed the development proposed through the 2030 Local Plan as a whole would not lead to likely significant effects either alone or in-combination with other plans or programmes. The updated HRA Report concluded that there will be no adverse effects on the integrity of any European site.
- 7.8 National Planning Practice Guidance²⁰ confirms that an individual assessment of non-strategic policies and projects in a neighbourhood plan may not be necessary in cases where strategic appropriate assessment is sufficiently robust. They would need to contain complete, precise and definitive findings and conclusions capable of removing doubt on the impacts of the non-strategic policies and/or projects in a neighbourhood plan. As long as these measures have been properly considered in a recent plan, and the development will not create additional risks of a significant effect on a habitats site, they may not need further assessment at the non-strategic level. The 2030 Local Plan

¹⁹ Available on the Council website at: www.runnymede.gov.uk/planning-policy/runnymede-2030-local-plan

²⁰ [National Planning Practice Guidance](#) Paragraph: 008 Reference ID: 65-008-20190722

was adopted in July 2020 and is considered to be recent. Its policies incorporate all of the measures recommended by the HRA Report, and an Independent Inspector concluded these policies were sound. The policies of the 2030 Local Plan provide protective measures which are sufficiently robust and achieve the required certainty to effectively avoid or reduce any adverse effects that may be caused by development proposals coming forward in the EGV Neighbourhood Area. The HRA of the Local Plan remains valid and there is no new material and relevant information that should be considered.

- 7.9 There are several distinct stages of assessment which must be undertaken in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended) to determine if a plan or project may affect the protected features of a habitats site before deciding whether to undertake, permit or authorise it. The four stages include:

Step 1: Screening – identification of likely impacts on a National Network site either alone or in combination with other plans/projects and consideration of whether these are significant. Following the decision of the ECJ in the *People Over Wind & Sweetman v. Coillite Teoranta* (C-323/17) case, avoidance and/or mitigation measures cannot be taken into account at the screening stage and it is purely an exercise to determine if possible pathways for effect exist and whether these can be ruled out taking account of the precautionary principle. It is the opinion of this HRA screening assessment that adopted policies of the current development plan and draft policies in the Neighbourhood Plan which act as avoidance/mitigation cannot be taken into account at this stage of HRA.

Step 2: Appropriate Assessment – consideration of the impact on the integrity of the National Network site whether alone or in combination with other plans or projects with respect to the sites structure, function and conservation objectives. Where there are significant effects, step 2 should consider potential mitigation measures.

Step 3: Assessment of Alternative Solutions – assessing alternative ways of achieving the objectives of the plan/project which avoid impacts; and

Step 4: Assessment of Compensatory Measures – identification of compensatory measures should impact not be avoided and no alternative solutions exist and an assessment of imperative reasons of overriding public interest (IROPI) deems that a project should proceed.

- 7.10 Should step 1 reveal that significant effects are likely or an effect cannot be discounted because of uncertainty, then it is necessary to move onto step 2: Appropriate Assessment. If step 2 cannot rule out significant effects even with mitigation, then the process moves onto step 3 and finally step 4 if no alternative solutions arise.
- 7.11 There are four stages to consider under 'Step 1 – Screening'. **Stage 1** includes determining whether the plan/project is directly connected with or necessary to the management of the site. It can be confirmed that EGV NP is not currently connected with or necessary to the management of a National Network site. **Stage 2** describes the plan/project and describes other plans/projects that have the potential for in-combination impacts. Information about the Neighbourhood Plan can be found in Section 4 of this document. Table 3 below identifies those other plans and projects which may have in-combination impacts.

Table 3: Other Key Plans/Projects

Plan/project	Description
National Planning Policy Framework (NPPF) (2019)	High level national planning policy covering topics such as housing, economy, employment, retail as well as biodiversity, flood risk and heritage.
South East Plan 2009	Saved Policy NRM6 sets out protection for the Thames Basin Heaths SPA.
Runnymede 2030 Local Plan	Sets policies for the consideration of development and the spatial strategy for the Borough including provision of 7,507 dwellings.
Other Local Authority Local Plans within zone of influence or adjoining sites identified in paras 7.2	Housing targets for areas around National Network sites are set out in Table 4.
Large-scale projects within zone of influence or adjoining National Network sites	Large scale projects within zone of influence are subsumed in the consideration of 'Other Local Authority Local Plans' above.
Thames Basin Heaths Joint Delivery Framework 2009	Sets out the agreed Framework regarding the approach and standards for avoiding significant effects on the Thames Basin Heaths SPA.
Environment Agency, Thames River Basin District Management Plan (2015)	Sets out actions to improve water quality. Future aims for the River Wey include implementing Lower Wey Oxbow Restoration Project to enhance and restore the main Wey river channel and Wey Diffuse Advice Project throughout the catchment.
Environment Agency, Thames Catchment Flood Management Plan (2009)	Aim is to promote more sustainable approaches to managing flood risk. Will be delivered through a combination of different approaches. Identifies that over 5,000 properties in Runnymede at risk in a 1% annual probability river flood.
Environment Agency, Thames Abstraction Licensing Strategy (2019)	Identifies the Thames having restricted 'Water available for licensing'.
Environment Agency River Wey Catchment Abstraction Management Strategy (2019)	Identifies the Wey having restricted 'Water available for licensing'.
Affinity Water Resource Management Plan (2020)	To put in place actions to help customers reduce their water usage.
River Thames Scheme	Runnymede Borough Council is working in partnership with the Environment Agency and other local authorities to deliver this flood alleviation and management scheme in the area affected by flooding (includes areas of Englefield Green Village Neighbourhood Area).

Table 4: List of Local Authority Housing Targets within 5km of Thames Basin Heaths SPA

Site	Local Plan Area	Housing Target
Thames Basin Heaths SPA		
	Waverley Borough	11,210
	Guildford Borough	10,678
	Woking Borough	4,964
	Surrey Heath Borough	3,240
	Runnymede Borough	7,507
	Elmbridge Borough	3,375
	Bracknell Forest Borough	11,139
	Windsor & Maidenhead	14,260
	Wokingham Borough	13,230
	Rushmoor Borough	8,884
	Hart District	6,214
Total		94,701

7.12 **Stage 3** identifies potential effects on the National Network site(s). Information regarding the sites screened and the likely effects that may arise due to implementation of the Neighbourhood Plan can be found in Tables 5 and 6. All other National Network sites were screened out of this assessment at an early stage as it was considered that their distance from the Neighbourhood Plan urban area (where new development is directed) coupled with the nature and content of the proposed Neighbourhood Plan meant that there is no pathway or mechanism which would give rise to significant effects either alone or in combination. In consideration of the small geographical area of the EGV NP, and the distance of any new development in its Urban Area from European sites outside and (in the case of Windsor Great Park SAC) just within the Neighbourhood Area boundary, HRA screening considers that the EGV NP is not likely to have significant effects on EU designated sites, either alone or in-combination with other plans and projects. The implications of effects from planned development on the integrity of the European sites has been previously tested through HRA of the 2030 Local Plan. The EGV NP does not propose to allocate any development sites and provides general policies, supported by requirements in design codes, which amplify the requirements of Local Plan policies which seek to protect and enhance designated sites.

Table 5: Details of the Thames Basin Heaths SPA and Potential Effects Thereon

European site:	Thames Basin Heaths SPA
Site description:	The Thames Basin Heaths SPA was proposed in October 2000, and full SPA status was approved on 9 March 2005. It covers an area of some 8,274 ha, consisting of 13 Sites of Special Scientific Interest (SSSI) scattered from Surrey, to Berkshire in the north, through to Hampshire in the west. The habitat consists of both dry and wet heathland, mire, oak, birch acid woodland, gorse scrub and acid grassland with areas of rotational conifer plantation.
Relevant international nature conservation features:	See Appendix 1.
Environmental conditions which support the site:	<ul style="list-style-type: none"> • Appropriate management • Management of disturbance during breeding season (March to July) • Minimal air pollution • Absence or control of urbanisation effects, such as fires and introduction of non-native species • Maintenance of appropriate water levels • Maintenance of water quality
Potential effects arising from the Neighbourhood Plan	<ul style="list-style-type: none"> • Indirect effects arising from disturbance due to recreational activity on the SPA, atmospheric pollution and water resource as well as potential for direct urbanising impacts.

7.13 **Stage 4** – the final stage of screening - assesses the significance of any effects. The consideration of potential effects is set out in Table 6.

Table 6: Assessment of Potential Effects

European site:	Thames Basin Heaths SPA
Indirect effect from recreational disturbance and urbanisation.	The likely effects of recreational disturbance have been summarised in the Underhill-Day study for Natural England and RSPB (2005); this provides a review of the urban effects on lowland heaths and their wildlife. The main issues relating to the conservation objectives and the integrity of the SPAs and SACs effected by recreational disturbance and urbanisation as a whole are: fragmentation, disturbance, fires, cats, dogs (as a result of nest disturbance and enrichment), prevention of management, off-roading, vandalism and trampling.

	<p>Natural England has advised that recreational pressure, as a result of increased residential development within 5km of the Thames Basin Heaths SPA & Thursley, Ash, Pirbright & Chobham SAC (or sites of 50 or more dwellings within 7km), is having a significant adverse impact on the Annex I bird species. Woodlark and Nightjar are ground nesting and Dartford Warblers nest close to the ground. They are therefore sensitive to disturbance, particularly from dogs, but also from walkers, and cyclists etc. They are, in addition, vulnerable to other effects of urbanisation, in particular predation by cats.</p> <p>Joint work involving Natural England and the authorities affected by the SPA/SAC have agreed a mechanism to avoid impacts to the SPA/SAC from recreational activities in the form of Suitable Alternative Natural Greenspace (SANG) and Strategic Access Management & Monitoring (SAMM) and from the impacts of urbanisation by not allowing any net additional dwellings within 400m of the SPA.</p> <p>The draft EGV NP does not allocate any land or sites for net additional dwellings or other types of development that could give rise to increased recreational or urbanisation impacts. It is also considered that the Plan's draft policies mainly deal with design, protection of the environment, sustainability and the type of housing needed and would not lead to pathways for effect. As such, there are no pathways for effect for impacts either alone or in combination with other plans and projects. Therefore it is considered, at the time of undertaking this assessment and even in the absence of avoidance and/or mitigation measures which cannot be taken into account at the screening stage of HRA (including any adopted policies in the Runnymede 2030 Local Plan) that the draft EGV NP will not give rise to likely significant effects on Thames Basin Heaths SPA in terms of recreation or urbanisation.</p> <p>In this respect an Appropriate Assessment is not required.</p>
Atmospheric Pollution	<p>The Runnymede 2030 Local Plan HRA concludes no likely significant effect as a result of atmospheric pollution in combination with other plans and projects on the Thames Basin Heaths SPA, but states that there is a wider strategic approach to atmospheric pollution and the Thames Basin Heaths SPA and the Council should accord with this.</p> <p>However, the draft EGV NP does not allocate any land or sites for development and neither is it considered that any of the Plan's draft policies which mainly deal with the design, protection of the environment, sustainability and the type of housing needed would lead to pathways for effect. In this respect and even in the absence of avoidance/mitigation it is considered that the EGV NP would not give rise to likely significant effect in terms of atmospheric pollution either alone or in combination with other plans and projects.</p> <p>In this respect an Appropriate Assessment is not required.</p>
Water Quality & Quantity	<p>The Local Plan HRA does not identify water quality or resource as a potential linking pathway for effect on the Thames Basin Heaths SPA.</p> <p>The draft EGV NP does not allocate any land or sites for development and neither is it considered that any of the Plan's draft policies which mainly deal with design, protection of the</p>

	<p>environment, sustainability and the type of housing needed would lead to pathways for effect. In this respect and even in the absence of avoidance/mitigation it is considered that the EGV NP would not give rise to likely significant effect in terms of water resources or quality either alone or in combination with other plans and projects.</p> <p>In this respect an Appropriate Assessment is not required.</p>
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8. Statutory Screening Consultation and Overall Determination

- 8.1 The screening assessment outcomes were sent to the statutory environmental bodies (Environment Agency, Historic England, Natural England) for the formal 5 weeks consultation to demonstrate that due processes have been undertaken to screen the draft Englefield Green Village Neighbourhood Plan (June 2022) with regard to HRA and SEA. The Environment Agency did not respond (an automatic email of 24 July 2022 confirmed that due to resourcing issues the highest risk cases were being prioritised, and a bespoke response still hadn't been received by the Council after 10 weeks), but the responses from Natural England and Historic England are presented in Appendix 2.
- 8.2 Natural England advised (emailed letter 4 July 2022) that on the basis of the material supplied with the consultation there are unlikely to be significant environmental effects from the proposed plan in so far as their strategic environmental interests are concerned. In their view, the proposals contained within the plan will not have significant effects on sensitive sites that Natural England has a statutory duty to protect; and they are not aware of significant populations of protected species which are likely to be affected by the policies / proposals within the plan.
- 8.3 Historic England advised (email 19 July 2022) that based on the information provided, they consider that SEA would not be merited on grounds within their areas of interest.
- 8.4 Therefore, Runnymede Borough Council determines that the Englefield Green Village Neighbourhood Plan is unlikely to have significant environmental effects and thus does not require a Strategic Environmental Assessment (SEA).
- 8.5 Runnymede Borough Council also determines that the Englefield Green Village Neighbourhood Plan will not give rise to significant effects on National Network sites either alone or in-combination with other plans and/or projects. Given the findings of the screening assessment it is considered that a full appropriate assessment is not required.

APPENDIX 1: EUROPEAN SITE CONSERVATION OBJECTIVES²¹

South West London Waterbodies SPA

Conservation objectives:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring:

- The extent and distribution of the habitats of the qualifying features;
- The structure and function of the habitats of the qualifying features;
- The supporting processes on which the habitats of the qualifying features rely;
- The population of each of the qualifying features; and
- The distribution of the qualifying features within the site.

Qualifying features:

- A051: *Anas strepera*; Gadwall (Non-breeding); and
- A056: *Anas clypeata*; Northern shoveler (Non-breeding).

South West London Waterbodies Ramsar

Ramsar sites do not have the Conservation Objectives in the same way as SPAs and SACs. Information regarding the designation of Ramsar sites is contained in INCC Ramsar Information Sheets. Ramsar Criteria are the criteria for identifying Wetlands of International Importance. The relevant criteria and ways in which this site meets the criteria are presented in the table below.

Ramsar Criterion	Justification for the application of each criterion	
6	Ramsar criterion 6 – species/populations occurring at levels of international importance.	
	Qualifying species/populations (as identified at designation): Species with peak counts in spring/autumn	
	Northern shoveler, <i>Anas clypeata</i> , Northwest and Central Europe	397 individuals, representing an average of 2.6% of the GB population (5 year peak mean 1998/9- 2002/3)
	Species with peak counts in winter:	
	Gadwall, <i>Anas strepera strepera</i> , Northwest Europe	487 individuals, representing an average of 2.8% of the GB population (5 year peak mean 1998/9- 2002/3)

Thames Basin Heaths SPA

Conservation objectives:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

- The extent and distribution of the habitats of the qualifying features;
- The structure and function of the habitats of the qualifying features;
- The supporting processes on which the habitats of the qualifying features rely;
- The population of each of the qualifying features; and
- The distribution of the qualifying features within the site.

Qualifying features:

- A224: *Caprimulgus europaeus*; European nightjar (Breeding);
- A246: *Lullula arborea*; Woodlark (Breeding); and
- A302: *Sylvia undata*; Dartford warbler (Breeding).

Thursley, Ash, Pirbright and Chobham SAC

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

²¹ This information is drawn from the [Joint Nature Conservancy Council \(JNCC\)](#) and [Natural England](#).

Qualifying Features:

- H4010: Northern Atlantic wet heaths with *Erica tetralix*; Wet heathland with cross-leaved heath;
- H4030: European dry heaths; and
- H7150: Depressions on peat substrates of the *Rhynchosporion*.

Windsor Forest and Great Park SAC**Conservation objectives:**

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, 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.

Qualifying Features:

- H9120: Atlantic acidophilous beech forests with *Ilex* and sometimes also *Taxus* in the shrub layer (*Quercion robur-petraeae* or *Illici-Fagenion*); Beech forests on acid soils;
- H9190: Old acidophilous oak woods with *Quercus robur* on sandy plains; Dry oak-dominated woodland; and
- S1079: *Limoniscus violaceus*; Violet click beetle.

APPENDIX 2: RESPONSES FROM STATUTORY CONSULTEES

Date: 04 July 2022
Our ref: 397871
Your ref: Englefield Green Village Neighbourhood Plan - SEA / HRA Screening
Report Consultation Request



Runnymede Borough Council

BY EMAIL ONLY

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Sir / Madam,

Englefield Green Village Neighbourhood Plan - SEA / HRA Screening Report

Thank you for your consultation on the above dated 24 June 2022 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Screening Request: Strategic Environmental Assessment / Habitat Regulations Assessment

It is our advice, on the basis of the material supplied with the consultation, that, in so far as our strategic environmental interests (including but not limited to statutory designated sites, landscapes and protected species, geology and soils) are concerned, that there are unlikely to be significant environmental effects from the proposed plan.

Neighbourhood Plan

Guidance on the assessment of Neighbourhood Plans, in light of the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended), is contained within the [National Planning Practice Guidance](#). The guidance highlights three triggers that may require the production of an SEA, for instance where:

- a neighbourhood plan allocates sites for development
- the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan
- the neighbourhood plan may have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan.

We have checked our records and based on the information provided, we can confirm that in our view the proposals contained within the plan will not have significant effects on sensitive sites that Natural England has a statutory duty to protect.

We are not aware of significant populations of protected species which are likely to be affected by the policies / proposals within the plan. It remains the case, however, that the responsible authority should provide information supporting this screening decision, sufficient to assess whether protected species are likely to be affected.

Notwithstanding this advice, Natural England does not routinely maintain locally specific data on all potential environmental assets. As a result the responsible authority should raise environmental issues that we have not identified on local or national biodiversity action plan species and/or habitats, local wildlife sites or local landscape character, with its own ecological and/or landscape advisers, local

record centre, recording society or wildlife body on the local landscape and biodiversity receptors that may be affected by this plan, before determining whether an SEA/HRA is necessary.

Please note that Natural England reserves the right to provide further comments on the environmental assessment of the plan beyond this SEA/HRA screening stage, should the responsible authority seek our views on the scoping or environmental report stages. This includes any third party appeal against any screening decision you may make.

For any queries relating to the specific advice in this letter only please contact me on **paige.eke-goodwin@naturalengland.org.uk**. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely,

Paige Eke-Goodwin
Sustainable Development Lead Advisor – Thames Solent Area Team



By email only to: stephanie.broadley@runnymede.gov.uk

Our ref: PL00781562

Your ref: Englefield Green Village Neighbourhood Plan SEA- Screening Opinion

Main: 020 7973 3700

e-seast@historicengland.org.uk

louise.dandy@historicengland.org.uk

Date: 08/08/2022

Dear Sir or Madam

Englefield Green Village Neighbourhood Plan SEA Screening Opinion

Thank you for inviting Historic England to comment on this consultation. As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. Therefore we welcome this opportunity to review the Screening Report for this plan. For the purposes of this consultation, Historic England will confine its advice to the question, "Is it (the Englefield Green Village Neighbourhood Plan) likely to have a significant effect on the historic environment?". Our comments are based on the information supplied with the Screening Opinion.

The Screening Report indicates that the Council considers that the plan will not have any significant effects on the historic environment. We note that the plan does not propose to allocate any sites for development.

On the basis of the information supplied, and in the context of the criteria set out in Schedule 1 of the Environmental Assessment Regulations [Annex II of 'SEA' Directive], Historic England concurs with the Council that the preparation of a Strategic Environmental Assessment is not required.

|



Historic England, 4th Floor, The Atrium, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

Telephone 020 7973 3700 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.





Historic England

The views of the other two statutory consultation bodies should be taken into account before the overall decision on the need for an SEA is made.

I should be pleased if you can send a copy of the determination as required by REG 11 of the Environmental Assessment of Plans and Programmes Regulations 2004.

We should like to stress that this opinion is based on the information provided by you with your correspondence. To avoid any doubt, this does not reflect our obligation to provide further advice on later stages of the SEA process and, potentially, object to specific proposals which may subsequently arise (either as a result of this consultation or in later versions of the plan) where we consider that, despite the SEA, these would have an adverse effect upon the environment.

Historic England strongly advises that the conservation and archaeological staff of the relevant local authorities are closely involved throughout the preparation of the plan and its assessment. They are best placed to advise on; local historic environment issues and priorities, including access to data held in the Historic Environment Record (HER), how the allocation, policy or proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

Please do contact me, via email if you have any queries.

Yours sincerely

Louise Dandy
Historic Places Adviser



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