

Runnymede Borough Council

Infrastructure Delivery & Prioritisation Supplementary Planning Document (SPD)

Strategic Environmental Assessment (SEA)

Screening Statement - Determination under Regulation 9 of the SEA Regulations 2004

Habitats Regulations Assessment (HRA)

Screening Statement – Determination under Regulation 105 of the Conservation of Habitats
and Species Regulations 2017

July 2020

Introduction

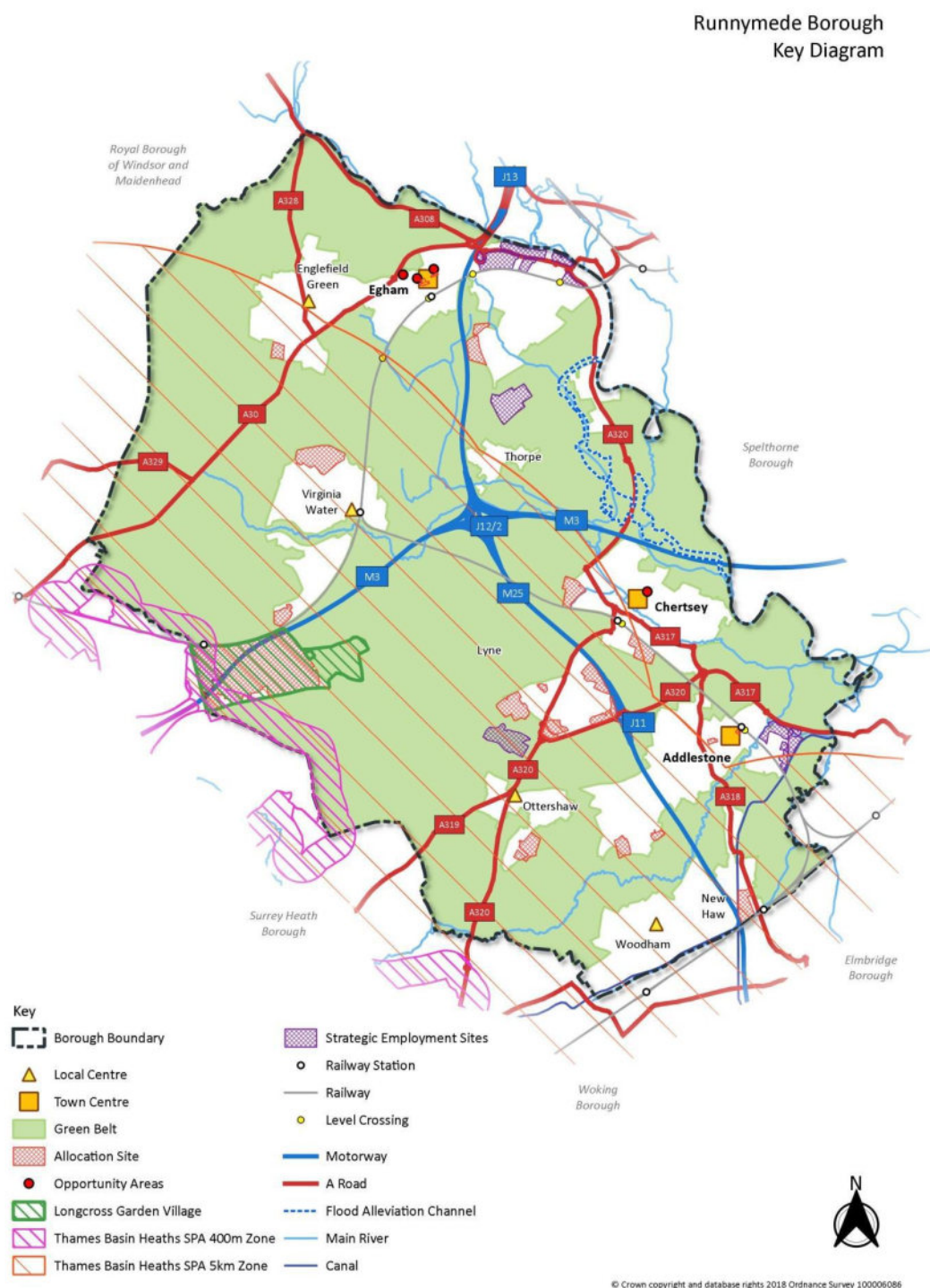
- 1.1. This Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) screening determination has been undertaken by Runnymede Borough Council in their duty to determine whether the Infrastructure Delivery & Prioritisation Supplementary Planning Document (SPD) requires SEA or HRA. A screening assessment was undertaken on a draft SPD in January 2020 and since this date the draft SPD has been the subject of public consultation. Following representations received to the consultation and clarification of the pre-conditions attached to the successful Housing Infrastructure Fund (HIF) bid, a number of amendments have been made to the draft SPD which require a second round of consultation. As such, this SEA/HRA screening is an update to the assessment undertaken in January 2020 to take account of the amendments made to the SPD and whether they would have significant effect.
- 1.2. Regulation 9 (1) of the Environmental Assessment of Plans and Programmes Regulations 2004 requires authorities to determine whether or not a Strategic Environmental Assessment is required for certain plans, policies or programmes. This statement also sets out the Borough Council's determination as to whether Appropriate Assessment is required under Regulation 105 of the Conservation of Habitats & Species Regulations 2017.
- 1.3. Under the requirements of the European Union Directive 2001/42/EC (Strategic Environmental Assessment (SEA) Directive)) and Environmental Assessment of Plans and Programmes Regulations (2004), specific types of plans that set the framework for the future development consent of projects or which require Appropriate Assessment must be subject to an environmental assessment.
- 1.4. There are exceptions to this requirement for plans that determine the use of a small area at a local level and for minor modifications if it has been determined that the plan is unlikely to have significant environmental effects.
- 1.5. In accordance with the provisions of the SEA Directive and the Environmental Assessment of Plans and Programmes Regulations (2004) (Regulation 9 (1)), the Borough Council must determine if a plan requires an environmental assessment. In accordance with Article 6 of the Habitats Directive (92/43/EEC) and Regulation 105 of the Conservation of Habitats & Species Regulations 2017, the Borough Council is the competent authority for determining if a plan requires Appropriate Assessment.

Background to the Infrastructure Delivery & Prioritisation SPD

- 1.6. The Planning & Compulsory Purchase Act 2004 (as amended) makes provision for local authorities to prepare and adopt Local Development Documents which can include SPD's. However, an SPD does not form part of the Development Plan for an area as set out in Section 38 of the Planning & Compulsory Purchase Act 2004 (as amended) but it is a material consideration in taking planning decisions.
- 1.7. An SPD is required to be consulted on and adopted by the Borough Council and once implemented sets out additional planning guidance that supports and/or expands upon the Policies of a Local Plan.
- 1.8. The proposed Infrastructure Delivery & Prioritisation SPD covers all of the area within the jurisdiction of Runnymede Borough Council and contains the urban areas of Addlestone, Chertsey, Englefield Green, Egham, Ottershaw, Woodham & New Haw and Virginia Water. Interspersed between the urban areas is designated Green Belt holding numerous wooded copses, golf courses and businesses as well as small

pockets of development, agriculture and equestrian uses. The M25 and M3 motorways bisect the Borough north-south and east-west respectively and effectively cut the Borough into four quarters. There are six rail stations in Runnymede Borough offering direct services to London Waterloo, Reading & Woking. A plan of the designated area is shown in Plan 1-1.

Plan 1-1: Map of Runnymede Borough



- 1.9. There are numerous areas of woodland/copses designated as ancient/semi-natural or ancient replanted woodland which are also identified as priority habitat as well as swathes of woodpasture and parkland which is a national Biodiversity Action Plan (BAP) designation. Priority habitat designations also include areas of lowland meadows, lowland heathland, and lowland fens. There are five SSSIs located in the Borough area, Basingstoke Canal, Langham Pond, Thorpe Haymeadow, Thorpe no.1 Gravel Pit and Windsor Forest.
- 1.10. Unit 2 of the Basingstoke Canal SSSI lies to the south of the Borough and is in an unfavourable, no change status which does not meet the PSA target of 95% in favourable or unfavourable recovering status. Status reasons are extent of habitat, lack of plant diversity and poor water quality.
- 1.11. Langham Pond SSSI is formed of 3 units. 100% of the SSSI is in a favourable or unfavourable recovering status, meeting the PSA target. The Thorpe Haymeadow SSSI is formed of one unit in a favourable condition, which also meets the PSA Target.
- 1.12. The Thorpe no.1 Gravel Pit SSSI is formed of one unit and is in a favourable condition status meeting the PSA target. The SSSI also forms part of the wider South West London Water Bodies Special Protection Area (SPA) and Ramsar, an internationally designated site for nature conservation importance.
- 1.13. The Windsor Forest SSSI is formed of 22 units with units 10, 11 and 16 within or partly within Runnymede. The SSSI is in 100% favourable condition status and meets the PSA target of 95%. The SSSI also forms part of the Windsor Forest & Great Park Special Area of Conservation (SAC) another internationally designated site for nature conservation importance.
- 1.14. Other internationally designated sites, whilst not within the Borough but are within 5km include, the Thames Basin Heaths Special Protection Area and Thursley, Ash, Pirbright & Chobham SAC.
- 1.15. The Borough also lies within 12km of the Mole Gap to Reigate Escarpment SAC, 12.2km from Burnham Beeches SAC, 13km of the Richmond Park and Wimbledon Common SACs, 20km from the Chiltern Beechwoods SAC, 23km from the Wealden Heaths Phase I SPA and its component parts (including Thursley, Hankley & Frensham Commons SPA and Thursley & Ockley Bog Ramsar) and 30km from the Wealden Heaths Phase II SPA.
- 1.16. There are also over 30 Sites of Nature Conservation Importance (SNICIs) in the Borough as well as two Local Nature Reserves at Chertsey Meads and Riverside Walk in Virginia Water. The Borough lies within the River Wey and Tributaries catchment and there are large areas of the Borough, including within its urban areas which lie within flood risk zones 2 and 3 including functional floodplain.
- 1.17. From a heritage perspective, the Borough contains numerous statutorily listed or locally listed buildings and structures most notably the Grade I Royal Holloway College building in Englefield Green. There are 6 Conservation Areas in the borough as well as 6 scheduled ancient monuments, 48 areas of high archaeological potential and four historic parks and gardens.
- 1.18. The amended Infrastructure Delivery & Prioritisation SPD dated July 2020 does not form part of the Development Plan for the area and does not allocate any sites for development or propose policies for the use of land, but is a material consideration in decision making. The 2030 Local Plan which is the document which allocates sites and contains policies concerning land use has been the subject of Sustainability

Appraisal (including the requirements for Strategic Environmental Assessment) as well as Habitats Regulations Assessment (HRA).

- 1.19. The SPD instead sets out guidance on how the Borough Council will prioritise infrastructure delivery and funding as well as guiding the route by which infrastructure will be secured before and after the implementation of a CIL Charging Schedule. The amended SPD identifies 'critical' infrastructure which includes the A320 Corridor & M25 Junction 11 mitigation as well as SANG to avoid impact to the Thames Basin Heaths SPA.
- 1.20. The SPD guides the delivery of physical and/or 'critical' infrastructure through Section 106 or Section 278 agreements with contributions in lieu of physical provision or toward 'non-critical' collected by CIL where the Local Plan indicates this. The SPD also sets out the basis for a negotiated approach to financial contributions from development in lieu of physical infrastructure provision through the use of Section 106 agreements prior to the introduction of a CIL charge. The main amendments to the SPD since January 2020 are:
- Clarification of the Council's approach to negotiating contributions towards repayment of the HIF loan;
 - Addition of Blue Infrastructure to the list of infrastructure types;
 - Confirmation the Council will not request financial contributions through Section 106 toward infrastructure projects physically provided by a development other than for management/maintenance;
 - Placing a cap on the monitoring contribution per Section 106 agreement;
 - Clarification of how net dwellings/occupants should be calculated;
 - Confirming a formula based approach to contributions at outline stage where deemed appropriate;
 - Signposting that infrastructure for Controlled Parking Zones (CPZs) may be negotiated;
 - Referencing the Playing Pitch Strategy for Outdoor Sports Contributions;
 - Adding the methodology used to calculate estimated net floorspace from sites contingent on A320 improvements.

Sustainability Appraisal

- 1.21 The Planning and Compulsory Purchase Act 2004 and associated Regulations (as amended), requires a local authority to carry out a Sustainability Appraisal (SA) for their Local Plan documents. This considers the social and economic impacts of a plan as well as the environmental impacts. SPDs are not Local Plan documents and therefore a Sustainability Appraisal is not required.

Habitats Regulations Assessment (HRA) – Screening

- 1.22 The need to undertake an Appropriate Assessment as part of an HRA is set out within the EC Habitats Directive 92/43/EEC and transposed into British Law by Regulation 105 of the Conservation of Habitats and Species Regulations 2017. The Appropriate Assessment stage of HRA is only required should the preliminary screening assessment not be able to rule out likely significant effects.

- 1.23 The European Habitats Directive requires that any plan or project likely to have a significant effect on a European site must be subject to an Appropriate Assessment. The Habitats Directive states that any plan or project not connected to or necessary for a site's management, but likely to have significant effects thereon shall be subject to appropriate assessment. There are four distinct stages in HRA namely: -

Step 1: Screening – Identification of likely impacts on a European 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 and in light of the Planning Practice Guidance Note on Appropriate Assessment that adopted policies of the current development plan cannot be taken into account at this stage of HRA where they are proposing mitigation for European Sites. Similarly any HRA undertaken for other development plan documents which have not been through Examination in Public (EiP) and found sound should only be given limited weight. However, it is considered that greater weight can be attributed to screening undertaken in HRAs which support development plan documents found sound at examination. In this respect, this screening assessment takes account of the Runnymede 2030 Local Plan HRA where it indicates that effects can be screened out in the absence of avoidance/mitigation.

Step 2: Appropriate Assessment – consideration of the impact on the integrity of the European 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 avoidance and/or mitigation measures.

Step 3: Assessment of Alternative Solutions – Assessing alternative ways of achieving the objectives of the plan/project which avoids impact, if after Step 2 significant effect cannot be ruled out even with avoidance or mitigation measures; 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.

- 1.24 Should step 1 reveal that significant effects are likely or 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 effect even with avoidance and/or mitigation, then the process moves onto step 3 and finally step 4 if no alternative solutions arise.

Step 1 - Screening

- 1.25 There are four stages to consider in a screening exercise: -

Stage 1: Determining whether the plan/project is directly connected with or necessary to the management of the site;

Stage 2: Describing the plan/project and description of other plan/projects that have the potential for in-combination impacts;

Stage 3: Identifying potential effects on the European site(s); and

Stage 4: Assessing the significance of any effects.

Stage 1

- 1.26 It can be determined that the Infrastructure Delivery & Prioritisation SPD is not directly connected with or necessary to the management of a European site.

Stage 2

- 1.27 Information about the Infrastructure Delivery & Prioritisation SPD can be found in paragraphs 1.6 to 1.20 of this screening assessment. Table 1-1 lists those other plans and projects, which may have in-combination impacts.

Table 1-1: Other Key Plans/Projects

<p>Plan/ Project</p>	<p>National Planning Policy Framework (2019): High level national planning policy covering topics such as housing, economy, employment, retail as well as biodiversity, flood risk and heritage.</p> <p>South East Plan 2009: Saved Policy NRM6 sets out protection for the Thames Basin Heaths SPA.</p> <p>London Plan 2016: Contains planning policies for the development of land across the wider London area including housing and employment allocations with a target of 42,000 new homes per annum.</p> <p>Runnymede 2030 Local Plan (Submission + Main Modifications): Sets policies for the consideration of development and the spatial strategy for the Borough including provision of 7,920 dwellings over the Plan period and allocations for residential, employment and retail development.</p> <p>Runnymede Local Plan Second Alteration (2001): The current adopted Local Plan setting out policies for the use of land in the Runnymede area. All policies in the 2001 Plan will be replaced on adoption of the 2030 Local Plan.</p> <p>Other Local Authority Local Plans within 10km or adjoining sites identified in paras 1.8 to 1.12: Housing target for areas around European sites set out in Table 1-2.</p> <p>Large Scale Projects within 10km or adjoining European Sites: Large scale projects within 10km are subsumed in the consideration of 'Other Local Authority Local Plans' above.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Environment Agency, River Wey Catchment Abstraction Management Strategy (2019): identifies the Wey having restricted 'Water available for licensing'.</p> <p>Environment Agency, Water Resources Strategy: Regional Action Plan for Thames Region (2009): Key priorities for Thames region include ensuring sufficient water resources are available, making water available in over-abstracted catchments and reducing demand.</p>
---------------------------------	---

Table 1-2: List of Local Authority Housing Targets within 10km of European Sites

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	7,920
	Elmbridge Borough	3,375
	Bracknell Forest Borough	11,139
	Windsor & Maidenhead	14,260
	Wokingham Borough	13,230
	Rushmoor Borough	8,884
	Hart District	7,614
Total		96,514
Windsor Forest & Great Park SAC		
	Runnymede Borough	7,920
	Woking Borough	4,964
	Surrey Heath Borough	3,240
	Spelthorne Borough	3,320
	Elmbridge Borough	3,375
	Windsor & Maidenhead Borough	14,260
	Bracknell Forest Borough	11,139
	Slough Borough	6,250
	South Bucks District	2,800
	LB Hillingdon	6,375
	LB Hounslow	13,040
Total		76,683
South West London Water Bodies SPA & Ramsar		
	Runnymede Borough	7,920
	Elmbridge Borough	3,375
	Spelthorne Borough	3,320
	Epsom & Ewell Borough	3,620
	Mole Valley District	3,760
	Windsor & Maidenhead Borough	14,260
	Slough Borough	6,250
	Bracknell Forest Borough	11,139
	South Bucks District	2,800
	LB Hillingdon	6,375
	LB Hounslow	13,040
	LB Ealing	14,000
	LB Kingston	5,625
	LB Richmond	3,150
Total		98,634

* Also includes the Thursley, Ash, Pirbright & Chobham SAC

Stage 3

- 1.28 Information regarding the European site(s) screened and the likely effects that may arise due to implementation of the Infrastructure Delivery & Prioritisation SPD can be found in Tables 1-3 to 1-6 and 1-7. All other European Sites were screened out of this

assessment at an early stage as it was considered that their distance from the Borough area meant that there is no pathway or mechanism which would give rise to significant effect either alone or in combination. In this respect regard has been had to the 2030 Local Plan HRA specifically paragraphs 2.1-2.2 and Table 1 of the HRA of Main Modifications (December 2019).

Table 1-3: Details of Thames Basin Heaths SPA and Potential Effects Thereon

European site:	Thames Basin Heaths Special Protection Area (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:	Thames Basin Heaths SPA qualifies under Article 4.1 of the Birds Directive (79/409/EEC) by supporting populations of European importance of the following species listed on Annex I of the Directive: During the breeding season: <ul style="list-style-type: none"> - Nightjar <i>Caprimulgus europaeus</i>: 7.8% of the breeding population in Great Britain (count mean, 1998-1999); - Woodlark <i>Lullula arborea</i>: 9.9% of the breeding population in Great Britain (count as at 1997); - Dartford warbler <i>Sylvia undata</i>: 27.8% of the breeding population in Great Britain (count as at 1999).
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 invasive non-native species • Maintenance of appropriate water levels • Maintenance of water quality
Potential Effects arising from the Infrastructure Delivery & Prioritisation SPD	<ul style="list-style-type: none"> • None (see Table 1-7)

Table 1-4: Details of Thursley, Ash, Pirbright & Chobham SAC and Potential Effects Thereon

International site:	Thursley, Ash, Pirbright & Chobham Special Area of Conservation (SAC)
Site description:	The Thursley, Ash, Pirbright & Chobham SAC covers an area of some 5,154 ha with areas of wet and dry heathland, valley bogs, broad-leaved and coniferous woodland, permanent grassland and open water.
Relevant international nature conservation features:	The Thursley, Ash, Pirbright and Chobham Special Area of Conservation is designated for three Annex I habitats. The qualifying Annex 1 habitats are: <ul style="list-style-type: none"> - Wet heathland with cross-leaved heath - Dry heaths - Depressions on peat substrates
Environmental Conditions which Support the Site	<ul style="list-style-type: none"> • Appropriate management; • Managed recreational pressure; • Minimal air pollution; • Absence or control of urbanisation effects such as fires and introduction of invasive non-native species; • Maintenance of appropriate water levels; • Maintenance of water quality.
Potential Effects arising from the Infrastructure Delivery & Prioritisation SPD	<ul style="list-style-type: none"> • None (see Table 1-7)

Table 1-5: Details of Windsor Forest & Great Park SAC and Potential Effects Thereon

International site:	Windsor Forest & Great Park SAC
Site description:	The Windsor Forest & Great Park SAC covers an area of some 1,680 ha with Atlantic acidophilus beech forests with Ilex and sometimes Taxus. It is one of four outstanding locations in the UK for oak woods on sandy plains and is one of only three areas in the UK for Limoniscus violaceus (violet click beetle).
Relevant international nature conservation features:	Annex I habitat of oak woods on sandy plain which is the primary reason for designation with Atlantic beech forests.
Environmental Conditions	<ul style="list-style-type: none"> • Loss of trees through forestry management • Urbanisation • Managed recreational pressure

which Support the Site	<ul style="list-style-type: none"> • Air Quality
Potential Effects arising from the Infrastructure Delivery & Prioritisation SPD	<ul style="list-style-type: none"> • None (see Table 1-7)

Table 1-6: Details of South West London Water Bodies SPA & Ramsar and Potential Effects Thereon

International site:	South West London Water Bodies SPA & Ramsar
Site description:	The South West London Water Bodies SPA & Ramsar covers an area of some 825 ha and is formed from 7 former gravel pits and reservoirs which support overwintering populations of protected bird species.
Relevant international nature conservation features:	Supports overwintering populations of:- Gadwall Shoveler
Environmental Conditions which Support the Site	<ul style="list-style-type: none"> • Managed recreational pressure • Water quality • Water abstraction
Potential Effects arising from the Infrastructure Delivery & Prioritisation SPD	<ul style="list-style-type: none"> • None (see Table 1-7)

Stage 4

1.29 The consideration of potential effects are set out in Table 1-7.

Table 1-7: Assessment of Potential Effects

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 SAC's effected by recreational disturbance and urbanisation as a whole are: fragmentation, disturbance, fires, cats, dogs (as a result of nest disturbance and enrichment),
---	---

	<p>prevention of management, off-roading, vandalism and trampling.</p> <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>In terms of the Windsor Forest & Great Park SAC the Runnymede 2030 Local Plan HRA states that forestry management and recreational impacts has the potential for loss of trees and damage to trees from burning (arson).</p> <p>For the South West London Water Bodies SPA & Ramsar threats arise through unmanaged recreational activities such as use of motorboats and fishing.</p> <p>The Infrastructure Delivery & Prioritisation SPD as amended contains guidance on what infrastructure types and projects should be prioritised for delivery and/or routes and basis for delivery and funding. However, it does not allocate or safeguard any land or sites for net additional dwellings or other types of development including infrastructure projects that could give rise to increased recreation or urbanisation impacts.</p> <p>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 Local Plan Part 1 or emerging policies in the 2030 Local Plan) that the</p>
--	---

	<p>amended Infrastructure Delivery & Prioritisation SPD will not give rise to likely significant effects on any of the European Sites in terms of recreation or urbanisation and 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, Thursley, Ash, Pirbright & Chobham SAC or the Windsor Forest & Great Park SAC, given the findings of the Council's air quality evidence.</p> <p>The amended Infrastructure Delivery & Prioritisation SPD contains guidance on what infrastructure types and projects should be prioritised for delivery and/or routes and basis for delivery and funding. However, it does not allocate or safeguard land or sites for any development including infrastructure projects. Whilst the amended SPD includes local highway infrastructure improvements on the A320 Corridor and M25 Junction 11 in Runnymede, none of the proposed improvements lie within 200m of designated sites (the distance at which air quality from traffic impacts can effect designated sites) and it is not the amended SPD but the emerging Local Plan which identifies and allocates the improvement works.</p> <p>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 Local Plan Part 1 or emerging 2030 Local Plan) that the amended Infrastructure Delivery & Prioritisation SPD will not give rise to likely significant effects on any of the European Sites in terms of air quality.</p> <p>In this respect an Appropriate Assessment is not required.</p>
Water Quality & Resource	<p>The Runnymede 2030 Local Plan HRA concludes no likely significant effects to European sites as a result of water quality or abstraction.</p> <p>The amended Infrastructure Delivery & Prioritisation SPD contains guidance on what infrastructure types and projects should be prioritised for delivery and/or routes and basis for delivery and funding. Whilst the SPD does set out flood mitigations and drainage within its prioritisation hierarchy as well as Blue Infrastructure, it does not allocate or safeguard any land or sites for development including water related</p>

	<p>infrastructure projects such as the River Thames Scheme or site specific flood/drainage projects. This is the role of the emerging Local Plan and 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 Local Plan Part 1 or emerging 2030 Local Plan) that the amended Infrastructure Delivery & Prioritisation SPD will not give rise to likely significant effects on any of the European Sites in terms of water quality or resource.</p> <p>In this respect an Appropriate Assessment is not required.</p>
--	--

- 1.30 It is the conclusion of this updated HRA that following a screening assessment it can be ascertained, in light of the information available at the time of assessment and even in the absence of avoidance and mitigation measures that the amended Infrastructure Delivery & Prioritisation SPD **will not** give rise to significant effects on European 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.

The SEA Screening Process

- 1.31 The process for determining whether or not an SEA is required is called 'screening'. For some types of plan or programme SEA is mandatory and includes the following:
- Plans which are prepared for town and country planning or land use and which set the framework for future development consent of projects listed in the Environmental Impact Assessment (EIA) Directive; or
 - Plans which have been determined to require an assessment under the Habitats Directive (this has already been screened out as set out in paragraphs 1.21 to 1.30 of this screening assessment).
- 1.32 However, the main determining factor when considering whether a plan or programme requires SEA is whether it will have significant environmental effects.
- 1.33 Within 28 days of making its determination, the determining authority must publish a statement, such as this one, setting out its decision. If it is determined that an SEA is not required, the statement must include the reasons for this.
- 1.34 This updated Screening Report sets out the Council's determination under Regulation 9(1) of the Environmental Assessment of Plans and Programmes Regulations 2004 on whether or not SEA is required for the amended Infrastructure Delivery & Prioritisation SPD. The Borough Council must consult with the three statutory bodies (Environment Agency, Historic England, Natural England) and take their views into account before issuing a final determination. The responses received from the three

statutory bodies on the draft Screening Assessment dated December 2019 which supported the first iteration of the SPD and how the Council took these into account are set out in Table 1-8. Subsequent comments on the updated Screening Assessment from the three statutory bodies and how these are taken into account are shown in Table 1-9.

Table 1-8: Comments from Statutory Bodies to draft Screening Assessment

Statutory Body	Response	Comment & Action
Environment Agency	<p>Agree with screening assessment that the Infrastructure Delivery & Prioritisation SPD will not have a significant effect on the environment.</p> <p>However, there are some inconsistent conclusions drawn, as an example between Table 1-7 and Table 1-10. Please remove any wording which implies the SPD could have an effect on environmental sustainability.</p> <p>Provision of SANGs is a mitigation measure for increased housing and infrastructure around European sites, it is not avoidance. Please review this document and ensure SANGs are referred to as mitigation measures not avoidance. Mitigation measures are not considered at the screening stage and as such, discussion of the use of mitigation in an SEA screening is inappropriate (People Over Wind & Sweetman v. Coillite Teoranta (C-323/17) case). Please review the document and limit the references</p>	<p>Noted – no further action required.</p> <p>Noted – inconsistent conclusions to be rectified and references to positive effects to be removed.</p> <p>Noted – However the Thames Basin Heaths Delivery Framework, which is an agreed framework between all local authorities affected by the TBH SPA and Natural England describe SANG as 'avoidance'. Further, the point of SANG is that it avoids impact at source. As such the screening assessment will continue to refer to SANG as avoidance. In terms of referring to the Sweetman case the assessment is simply pointing out that neither avoidance or mitigation can be considered at the <u>HRA</u> screening stage. Any references to mitigation which imply it has been</p>

	to mitigation in the text and Table 1-10.	taken into account will be removed. Other comments received on the content of the SPD, but these are not relevant to this screening assessment, but will be considered as part of the SPD consultation.
Historic England	In light of the Environmental Assessment of Plans and Programmes Regulations 2004, our view is that SEAs are not required in this instance for the reason set out in paragraph 1.35 (now 1.37) of the respective screening reports.	Noted – no further action required.
Natural England	Paragraph 3.25 of the SPD refers to C2 and C4 accommodation, for SANG & SAMM contributions we would advise that these types of accommodation are assessed on a case-by-case basis. Certain types of C2 uses have the potential to be occupied at a higher occupancy rate than 1 person per bedspace so may require additional mitigation to be secured. If amendments are made in line with the above advice then we would agree with the conclusion that the SPD will not have a likely significant effect on the environment, including European designated sites, and does not require an Appropriate Assessment under the Habitats Regulations or a Strategic Environmental Assessment.	Amendments made to SPD to clarify that C2 & C4 accommodation to be assessed on a case by case basis.

Table 1-9: Comments from Statutory Bodies to updated Screening Assessment

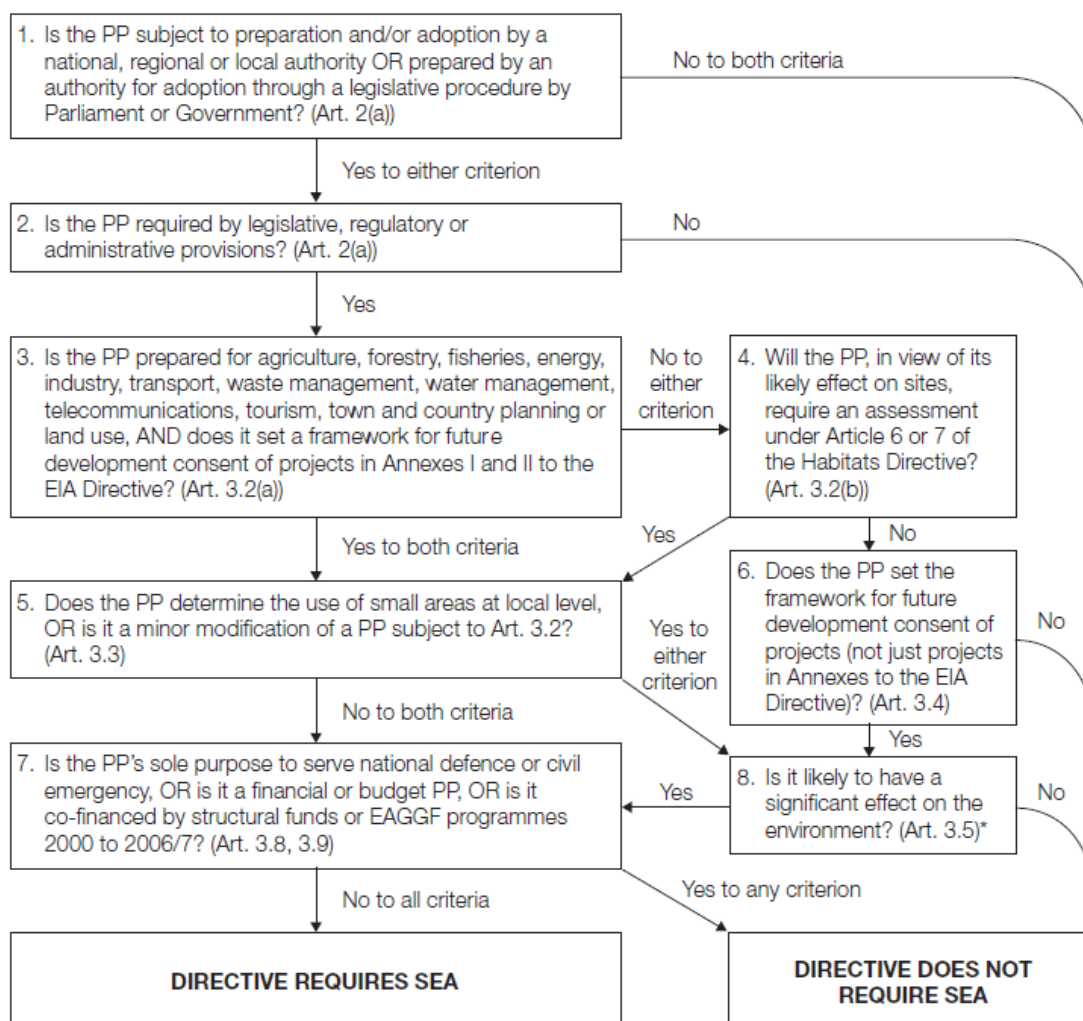
Statutory Body	Response	Comment & Action
Environment Agency	Agree with the conclusions that the SPD will not have a significant effect on the environment.	Noted – no further action required.
Historic England	In light of the Environmental Assessment of Plans and Programmes Regulations 2004, our view is that a SEA is not required in this instance for the reason set out in paragraph 1.37 of the Screening Statement.	Noted – no further action required.
Natural England	<p>Agree with conclusion of the HRA that, the Infrastructure Delivery & Prioritisation SPD will not give rise to significant effects on European Sites either alone or in-combination with other plans and/or projects and the conclusion that a full Appropriate Assessment is not required.</p> <p>Due to the fact that the Infrastructure Delivery & Prioritisation SPD does not allocate sites or development or safeguard infrastructure projects and therefore is unlikely to give rise to significant environmental effects, Natural England supports the conclusion of the screening that a SEA will not be required.</p>	Noted – no further action required.

- 1.35 The determination is based on a two-step approach, the first of which is to assess the plan against the flowchart as set out in government guidance *A Practical Guide to the Strategic Environmental Assessment Directive*¹. The flow chart is shown in Figure 1.

¹ A Practical Guide to the Strategic Environmental Process (2005) ODPM. Available at: <https://www.gov.uk/government/publications/strategic-environmental-assessment-directive-guidance>

Figure 1:

This diagram is intended as a guide to the criteria for application of the Directive to plans and programmes (PPs). It has no legal status.



*The Directive requires Member States to determine whether plans or programmes in this category are likely to have significant environmental effects. These determinations may be made on a case by case basis and/or by specifying types of plan or programme.

- 1.36 The second step is to consider whether the amended Infrastructure Delivery & Prioritisation SPD will have significant environmental effects when considered against the criteria set out in Annex II of the Directive and Schedule I of the Regulations. The findings of step 1 and step 2 are shown in Tables 1-10 and 1-11.

Table 1-10: SEA Screening Step 1

Stage in Flowchart	Y/N	Reason
1. Is the plan/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? (Article 2(a))	Y	The provision to prepare and adopt a Local Development Document is given by the Planning & Compulsory Purchase Act 2004 (as amended). The amended Infrastructure Delivery & Prioritisation SPD will be prepared and adopted by Runnymede Borough Council. The preparation and adoption procedure is set out in the Town & Country Planning (Local Development)(England) Regulations 2012. Whilst not forming part of the Development Plan the SPD will be a material consideration in planning decisions. Move to Stage 2
2. Is the plan/programme required by legislative, regulatory or administrative provisions? (Article 2(a))	N	There is no mandatory requirement to prepare or adopt Supplementary Planning Documents and if adopted it will not form part of the Development Plan for Runnymede. As answer is No, flowchart identifies end to screening process, but move to Stage 3 for completeness.
3. Is the plan/programme 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 future development consent of projects in Annexes I and II to the EIA Directive? (Article 3.2(a))	N	Whilst the plan is prepared for town & country planning, the amended SPD does not set the framework for future development consents for projects in Annex I or II to the EIA Directive. Move to Stage 4.
4. Will the plan/programme, in view of its likely effect on sites,	N	The HRA screening undertaken in paragraphs 1.21 to 1.30 of this

Stage in Flowchart	Y/N	Reason
require an assessment under Article 6 or 7 of the Habitats Directive? (Article 3.2(b))		assessment has determined that Appropriate Assessment is not required. Move to Stage 6.
5. Does the plan/programme determine the use of small areas at local level, OR is it a minor modification of a PP subject to Art. 3.2? (Article 3.3)	N/A	<p>The SPD will not form part of the Runnymede Development Plan and does not therefore determine the use of small areas at a local (or any) level.</p> <p>The plan is not a minor modification of an existing plan.</p> <p>Move to Stage 6</p>
6. Does the plan/programme set the framework for future development consent of projects (not just projects in Annexes to the EIA Directive)? (Article 3.4)	N	<p>The amended SPD does not allocate any land or sites for development or set a framework for future development consents.</p> <p>As answer is No, flowchart identifies end to screening process, but move to Stage 8 for completeness.</p>
7. Is the plan/programme's sole purpose to serve 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? (Article 3.8, 3.9)	N	<p>The sole purpose of the SPD is not to serve national defence or civil emergency. Whilst the amended SPD does set out financial matters concerned with developer contributions, this is not its sole purpose and it is not a budget plan or programme.</p>
8. Is it likely to have a significant effect on the environment? (Article 3.5)	N	<p>Effects on the environment and whether these are significant are considered in Table 1-11.</p> <p>No Significant Effects identified in Table 1-10, so determine that SEA is not required.</p>

Table 1-11: SEA Screening Step 2

Criteria (from Annex II of SEA Directive and Schedule I of the Regulations)		Response
Characteristics of the plan or programme		Significant Effect?
(a) The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources.	<p>The Infrastructure Delivery & Prioritisation SPD as amended does not set out policies against which development proposals in the Runnymede area will be considered, although it will be a material consideration in decision making. The prioritisation of certain infrastructure types over others and how these will be secured are not matters in the SPD which set the framework for projects.</p> <p>The section of the SPD dealing with developer contributions and the basis for negotiation could be seen as setting a framework for projects in terms of allocating financial resources or physical infrastructure. However, the SPD is not the document which secures the contributions or allocates the land for physical provision but simply guides the Council in its negotiations with developers to make a project acceptable in planning terms. As such, it is considered that the amended SPD only sets a framework for projects to a limited degree.</p>	N
(b) The degree to which the plan or programme influences other plans and programmes including those in a hierarchy.	The amended Infrastructure Delivery & Prioritisation SPD does not influence other plans or programmes but is itself influenced by other plans or programmes. It therefore does not influence any plans in a hierarchy.	N
(c) The relevance of the plan or programme for the integration of environmental considerations, in particular with a view to promoting sustainable development.	The amended Infrastructure Delivery & Prioritisation SPD sets out which infrastructure types the Council will prioritise, how this will be secured and if necessary the basis for a negotiated approach with developers for securing financial contributions towards infrastructure delivery. The SPD does not however, allocate any land/development or safeguard any infrastructure projects and as a consequence its relevance to the integration of environmental considerations is likely to be limited.	N

Criteria (from Annex II of SEA Directive and Schedule I of the Regulations)	Response	
(d) Environmental problems relevant to the plan or programme.	Environmental problems include potential recreational or urbanising impacts, atmospheric pollution and water resources to European sites. Paragraphs 1.21 to 1.30 of this assessment sets out the effects of the SPD on European sites and has determined no significant effects.	N
(e) The relevance of the plan or programme for the implementation of Community (EU) legislation on the environment (for example, plans and programmes linked to waste management or water protection).	The amended Infrastructure Delivery & Prioritisation SPD only has limited relevance to the implementation of Community legislation on the environment. The SPD may allow implementation through raising funds towards supporting infrastructure and prioritising infrastructure in relation to avoiding impact on European sites, but does not in itself propose, allocate or otherwise safeguard any infrastructure projects.	N
Characteristics of the effects and of the area likely to be affected		
(a) The probability, duration, frequency and reversibility of the effects.	Whilst the amended Infrastructure Delivery & Prioritisation SPD guides how the Council will prioritise infrastructure types, secure its delivery and the basis for negotiating financial contributions with developers, it does not allocate any land or sites for development or safeguard any infrastructure projects. Therefore the probability of any effect is low. Duration of any effects of prioritisation would likely be long term (beyond 2030) and generally positive but could be reversible depending on the next iteration of the Local Plan and its priorities. On the whole, effects are not considered to be significant.	N
(b) The cumulative nature of the effects	The amended Infrastructure Delivery & Prioritisation SPD does not allocate any land or sites for development or safeguard any infrastructure projects. As set out above the probability for effects is likely to be low. Taken with the allocation of sites and safeguarding of infrastructure in the emerging 2030 Local Plan and the mitigation measures set out therein, cumulative effects with the SPD are likely to be low as the Local Plan will be the main driver for development. Cumulative effects are likely to last over the plan period and possibly beyond but could be	N

Criteria (from Annex II of SEA Directive and Schedule I of the Regulations)	Response	
	reversible depending on future iterations of the Local Plan and its priorities. On the whole however, effects are not considered to be significant.	
(c) The transboundary nature of the effects	Given the geographic scope of the SPD it is considered that no transboundary effects will arise.	N
(d) The risks to human health or the environment (for example, due to accidents)	None.	N
(e) The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)	The amended Infrastructure Delivery & Prioritisation SPD will cover the whole of the geographic area of Runnymede in Surrey. The area covered is 78km ² with a population of around 83,448. Given the nature of the SPD it is considered that effects will not be significant.	N
(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; iii) Intensive land-use.	Given the nature of the Infrastructure Delivery & Prioritisation SPD: i) The area covered by the SPD contains 5 SSSIs with the majority in a favourable condition status which meets the PSA target of 95% in favourable or unfavourable recovering condition status. The Basingstoke Canal SSSI is in an unfavourable no change status which does not meet the PSA target. The Runnymede area contains numerous statutorily or locally listed buildings and structures as well as conservation areas, scheduled ancient monuments and areas of high archaeological potential. The area is a mixture of urban and Green Belt and contains features such as green spaces, wooded copses and golf courses. However, the SPD does not allocate any land for development or set development targets or safeguard any infrastructure projects and therefore significant effects on natural characteristics and cultural heritage are unlikely. ii) There are two Air Quality Management Areas (AQMAs) in the Runnymede area, along the entire length of the M25 which runs	N

Criteria (from Annex II of SEA Directive and Schedule I of the Regulations)	Response
	<p>through the Borough and the other in Addlestone at the High Street and Station Road junction. Air quality standards are exceeded at 5 air quality monitoring sites in the Runnymede area². The Environment Agency has identified the Wey catchment as having restricted water available for licensing. However, the SPD does not allocate any land for development or set development targets or safeguard infrastructure projects and therefore significant effects on air quality and water availability/quality are unlikely.</p> <p>iii) Intensive land use occurs in the urban areas (built development), but the SPD does not allocate any land or sites for development or safeguard any infrastructure projects. As such significant effects are unlikely.</p>
(g) The effects on areas or landscapes which have recognised national, community or international protection status.	<p>The effects on European Sites for Nature Conservation are dealt with in (d) above. There are no landscapes which have recognised national, community or international protection status in the Runnymede area.</p> <p style="text-align: center;">N</p>
Conclusion	The amended Infrastructure Delivery & Prioritisation SPD is unlikely to give rise to significant environmental effects and as such an SEA is not required.

1.37 On the basis of the Screening process it is determined that the amended Infrastructure Delivery & Prioritisation SPD does not require a SEA under the SEA Directive and Environmental Assessment of Plans and Programmes Regulations (2004). This is because: -

- The SPD is unlikely to give rise to significant environmental effects given that it does not allocate sites or development or safeguard infrastructure projects; and
- The content of the SPD as amended when taken as a whole and in combination with policies in the emerging 2030 Local Plan will not give rise to significant effects.

1.38 This assessment was made on the 6 July 2020.

² Runnymede 2017 Air Quality Annual Status Report (2017) RBC, Available at: <https://www.runnymede.gov.uk/airquality>