

**Runnymede Borough Council**

**Affordable Housing  
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

March 2022

## **1.0 Introduction**

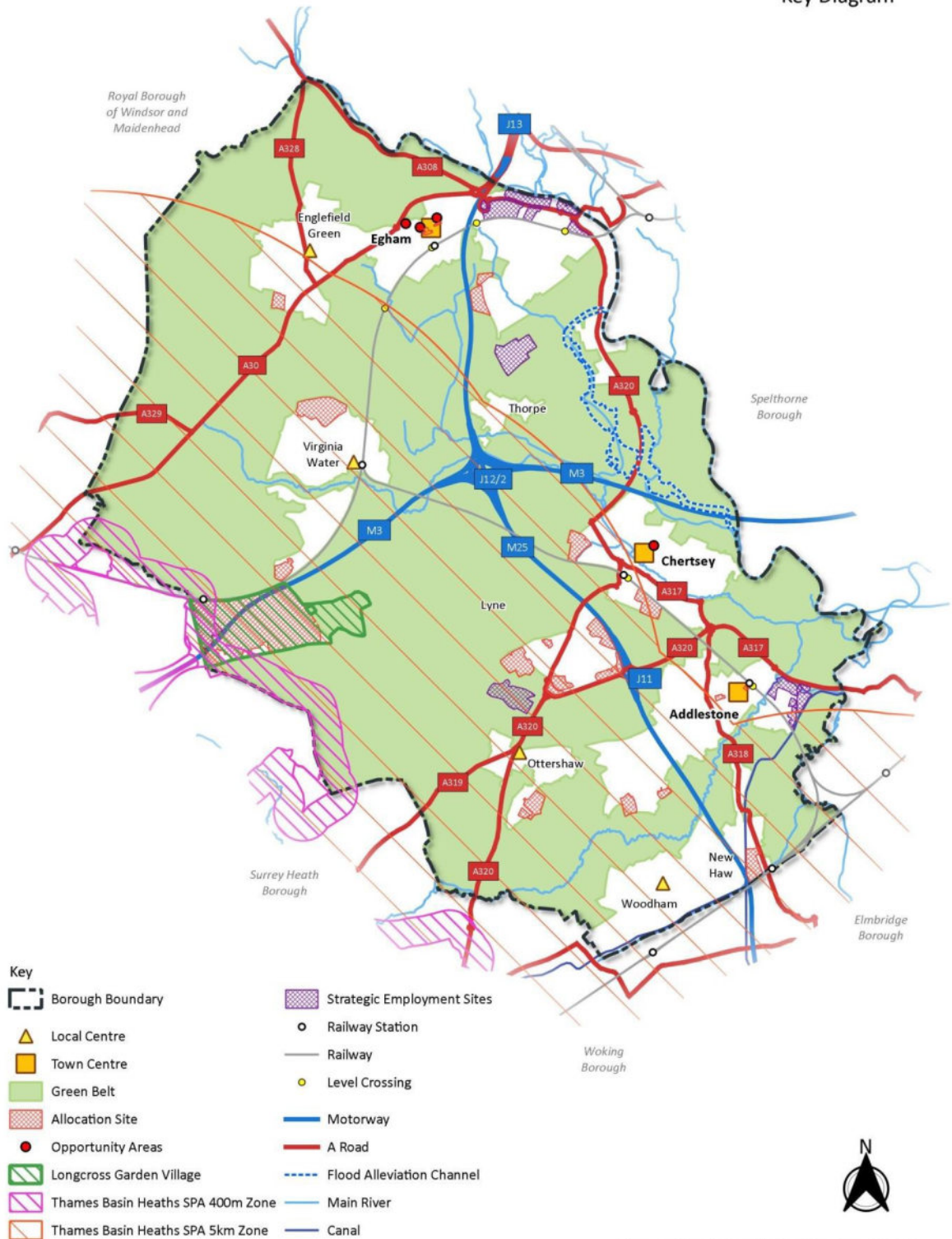
- 1.1. Runnymede Borough Council has prepared an Affordable Housing Supplementary Planning Document (SPD). The purpose of this screening statement is to ascertain whether the Affordable Housing SPD may have a significant effect on the environment and therefore require a Strategic Environmental Assessment (SEA) under European Union Directive 2001/42/EC (SEA Directive) and the Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations).
- 1.2. It also determines whether or not the contents of the Affordable Housing SPD require a Habitats Regulation Assessment (HRA) in accordance with European Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the Habitats Directive) and the associated Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations).
- 1.3. The screening exercise therefore looks at the proposals in the SPD to determine whether a significant effect is likely.

### **Background to the Affordable Housing Supplementary Planning Document (SPD)**

- 1.4. 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.
- 1.5. The purpose of the Affordable Housing SPD is to aid the effective implementation of the Council's Spatial Development Strategy and the Affordable Housing Policies in the adopted Runnymede 2030 Local Plan (July 2020). The key policies on Affordable Housing are:
  - SL19: Housing Mix and Size Requirements
  - SL20: Affordable Housing
- 1.6. 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 in the Local Plan. The SPD will provide practical advice to all parties seeking to comply with the Local Plan policies and will therefore be of particular use to developers, architects and agents wishing to bring forward development in the Borough.
- 1.7. The Runnymede 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).
- 1.8. The proposed Affordable Housing 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

## Runnymede Borough Key Diagram



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- 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 wood pasture 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 (SNCIs) 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.

## **Strategic Environmental Assessment – Regulatory Requirements**

- 1.18. The purpose of the SEA is to provide high level protection of the environment and to integrate considerations of the environment into the preparation and adoption of plans with a view to promoting sustainable development. Under the requirements of the European Union Directive 2001/42/EC (SEA Directive) and the Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations) specific types of plan that set the framework for the future development consent of projects must be subject to an environmental assessment.
- 1.19. In accordance with the provisions of the SEA Directive and the Environmental Assessment of Plans and Programmes Regulations (2004) (Regulation 9 (1)), the Council must determine whether a plan requires an environmental assessment. Where the Borough Council determines that SEA is not required, then under Regulation 9(3), the Council must prepare a statement setting out the reasons for this determination.

### **Habitat Regulation Assessment**

- 1.20 Habitats Regulations Assessment is required to determine whether a plan or project would have significant adverse effects upon the integrity of internationally designated sites of nature conservation importance, or the National Site Network (formerly known as Natura 2000 sites). The need for HRA is set out within the EC Habitats Directive 92/43/EEC and transposed into British Law by Regulation 102 of the Conservation of Habitats and Species Regulations 2017.

## **2.0 Legislative background**

### **Habitat Regulations Assessment**

- 2.1 The Habitats Regulations transpose the Habitats Directive into UK law and require HRA to be undertaken for any plan or project likely to have a significant effect upon a European protected site.
- 2.2 The Habitats Regulations 2017 consolidate the Conservation of Habitats and Species Regulations 2010 with subsequent amendments. The Habitats Regulations transpose Council Directive 92/43/EEC, on the conservation of natural habitats and of wild fauna and flora (EC Habitats Directive), into UK law. They also transpose elements of the EU Wild Birds Directive in England and Wales.
- 2.3 It is a requirement of Article 102 of the Habitats Regulations 2017 that "the plan-making authority for that plan must, before the plan is given effect, make an Appropriate Assessment of the implications for the site in view of that site's conservation objectives" where the plan is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects) and where it is not directly connected with or necessary to the management of the site.
- 2.4 An HRA is required for a plan or project to assess the potential implications for European wildlife sites, i.e., the National Site Network (formerly known as Natura 2000 sites). It explores whether the implementation of a plan or project would harm the habitats or species for which the sites are designated. The sites are:
- Special Protection Areas (SPAs) – designated by the Birds Directive (79/409/EEC as amended and 2009/147/EC), and:

- Special Areas of Conservation (SACs) – designated by the Habitats Directive (92/43/EEC).

2.5 In addition to SPAs and SACs, Ramsar sites are designated under the Ramsar convention. The Ramsar convention’s mission is to conserve and sustainably utilise wetland habitats. Although Ramsar sites are not covered by the Habitats Regulations, as a matter of Government Policy, they should be treated in the same way as European wildlife sites (i.e., SPAs and SACs). European wildlife sites and Ramsar sites are collectively known as internationally designated wildlife sites. Sites of Community Importance (SCIs), which are sites that have been adopted by the European Commission but not yet formally designated by the government, must also be considered.

### **Strategic Environmental Assessment**

2.6 SEA involves evaluation of the environmental impacts of a plan or programme. The requirement for SEA is set out in the European Directive 2001/42/EC adopted into UK law as the “Environmental Assessment of Plans or Programmes Regulations 2004”. The SEA Directive sets out a legal assessment process that must be followed. Often within the planning context, the SEA requirements are met by incorporating it within a Sustainability Appraisal (SA), which is a requirement for Development Plan Documents.

2.7 There is no legal requirement for Supplementary Planning Documents to be accompanied by Sustainability Appraisal, and this is reinforced in Planning Practice Guidance (PPG ref: 11-008- 20140306). However, “in exceptional circumstances” there may be a requirement for SPDs to undertake Strategic Environmental Assessment where it is felt they may have a likely significant effect on the environment that has not been assessed within the SEA/SA of the Local Plan.

2.8 To establish whether the SPD is thought to have significant environmental effects and therefore require SEA to be undertaken, a Screening Process has been followed and is presented in Section 4 of this report.

### **3.0 Habitats Regulations Assessment Screening**

#### **HRA Methodology**

3.1 HRA follows a four-stage process as outlined in the DCLG guidance “Planning for the Protection of European Sites: Appropriate Assessment”. These stages are described below:

#### **Step 1: Screening**

This process identifies the likely effects upon a European site, either alone or in combination with other plans/projects and determines whether these effects are likely to be significant.

Following the decision of the ECJ in the *People Over Wind & Sweetman v. Coillite Teoranta* (C-323/17). Measures that are necessary to avoid or reduce impacts on the European site, when considered environmental best-practice, cannot be taken into account at this stage.

If no likely significant effects are determined, the project or plan can proceed. If any likely significant effects are identified, step 2 commences.

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.

### **Step 2: Appropriate Assessment**

Step 2 is subsequent to the identification of likely significant effects upon a European site in Step 1. This assessment determines whether a project or plan would have an adverse impact on the integrity of a European site, either alone or in combination with other projects or plans.

This assessment is confined to the effects on the internationally important habitats and species for which the site is designated (i.e., the interest features of the site). If no adverse impact is determined, the project or plan can proceed. If an adverse impact is determined, step 3 is commenced.

### **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**

If no suitable avoidance/mitigation or alternative options are identified, as a rule the project or plan should not proceed.

However, in exceptional circumstances, if there is an 'imperative reason of overriding public interest' (IROPI) for the implementation of the project or plan, consideration can be given to proceeding in the absence of alternative solutions. In these cases, compensatory measures must be put in place to offset negative impacts.

## **Habitats Regulations Assessment (HRA) – Screening of the Affordable Housing SPD**

### **Step 1 - Screening**

3.2 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

- 3.3 It can be determined that the Affordable Housing SPD is not directly connected with or necessary to the management of a European site.

### Stage 2

- 3.4 Information about the Affordable Housing SPD can be found in paragraphs 1.5 to 1.17 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><b>Plan/ Project</b></p>	<p><b>National Planning Policy Framework (2021):</b> High level national planning policy covering topics such as housing, economy, employment, retail as well as biodiversity, flood risk and heritage.</p> <p><b>South East Plan 2009:</b> Saved Policy NRM6 sets out protection for the Thames Basin Heaths SPA.</p> <p><b>London Plan 2016:</b> 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><b>Runnymede 2030 Local Plan (Adopted):</b> 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><b>Thorpe Neighbourhood Development Plan</b> made (adopted) 30<sup>th</sup> June 2021.</p> <p><b>Other Local Authority Local Plans within 10km or adjoining sites identified in paras 1.8 to 1.17:</b> Housing target for areas around European sites set out in Table 1-2.</p> <p><b>Large Scale Projects within 10km or adjoining European Sites:</b> Large scale projects within 10km are subsumed in the consideration of 'Other Local Authority Local Plans' above.</p> <p><b>Thames Basin Heaths Joint Delivery Framework 2009:</b> Sets out the agreed Framework regarding the approach and standards for avoiding significant effects on the Thames Basin Heaths SPA.</p> <p><b>Environment Agency, Thames River Basin District Management Plan (2015):</b> 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><b>Environment Agency, Thames Catchment Flood Management Plan (2009):</b> Aim is to promote more sustainable approaches to managing flood risk. Will be delivered through a combination of different approaches.</p> <p><b>Environment Agency, River Wey Catchment Abstraction Management Strategy (2019):</b> identifies the Wey having restricted 'Water available for licensing'.</p> <p><b>Environment Agency, Water Resources Strategy: Regional Action Plan for Thames Region (2009):</b> Key priorities for Thames region include ensuring sufficient water resources are available, making water available in over-abstracted catchments and reducing demand.</p>
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**Table 1-2: List of Local Authority Housing Targets within 10km of European Sites**

Site	Local Plan Area	Housing Target
<b>Thames Basin Heaths SPA*</b>		
	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	7614
<b>Total</b>		<b>96,514</b>
<b>Windsor Forest &amp; Great Park SAC</b>		
	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
<b>Total</b>		<b>76,683</b>
<b>South West London Water Bodies SPA &amp; Ramsar</b>		
	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
<b>Total</b>		<b>98,634</b>

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

### Stage 3

- 3.6 Information regarding the European site(s) screened and the likely effects that may arise due to implementation of the Affordable Housing 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.

**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"> <li>- Nightjar <i>Caprimulgus europaeus</i>: 7.8% of the breeding population in Great Britain (count mean, 1998-1999);</li> <li>- Woodlark <i>Lullula arborea</i>: 9.9% of the breeding population in Great Britain (count as at 1997);</li> <li>- Dartford warbler <i>Sylvia undata</i>: 27.8% of the breeding population in Great Britain (count as at 1999).</li> </ul>
Environmental conditions which support the site	<ul style="list-style-type: none"> <li>• Appropriate management</li> <li>• Management of disturbance during breeding season (March to July)</li> <li>• Minimal air pollution</li> <li>• Absence or control of urbanisation effects, such as fires and introduction of invasive non-native species</li> <li>• Maintenance of appropriate water levels</li> <li>• Maintenance of water quality</li> </ul>
Potential Effects arising from the Affordable Housing SPD	<ul style="list-style-type: none"> <li>• None (see Table 1-7)</li> </ul>

**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"> <li>- Wet heathland with cross-leaved heath</li> <li>- Dry heaths</li> <li>- Depressions on peat substrates</li> </ul>
Environmental Conditions which Support the Site	<ul style="list-style-type: none"> <li>• Appropriate management;</li> <li>• Managed recreational pressure;</li> <li>• Minimal air pollution;</li> <li>• Absence or control of urbanisation effects such as fires and introduction of invasive non-native species;</li> <li>• Maintenance of appropriate water levels;</li> <li>• Maintenance of water quality.</li> </ul>
Potential Effects arising from the Affordable Housing SPD	<ul style="list-style-type: none"> <li>• None (see Table 1-7)</li> </ul>

**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 which Support the Site	<ul style="list-style-type: none"> <li>• Loss of trees through forestry management</li> <li>• Urbanisation</li> <li>• Managed recreational pressure</li> <li>• Air Quality</li> </ul>
Potential Effects arising	<ul style="list-style-type: none"> <li>• None (see Table 1-7)</li> </ul>

from the Affordable Housing SPD	
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**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"> <li>• Managed recreational pressure</li> <li>• Water quality</li> <li>• Water abstraction</li> </ul>
Potential Effects arising from the Affordable Housing SPD	<ul style="list-style-type: none"> <li>• None (see Table 1-7)</li> </ul>

Stage 4

3.7 The consideration of potential effects is set out in Table 1-7.

**Table 1-7: Assessment of Potential Effects**

Indirect effect from recreational disturbance and urbanisation.	<p>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), 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 &amp; Thursley, Ash, Pirbright &amp; Chobham SAC (or sites of 50 or more dwellings within 7km), is having a</p>
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	<p>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 &amp; 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 &amp; 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 &amp; Ramsar threats arise through unmanaged recreational activities such as use of motorboats and fishing.</p> <p>The Affordable Housing SPD provides guidance for delivering already adopted development plan policies at a higher tier (the Runnymede 2030 Local Plan) with the aim of securing planning obligations and affordable housing from new developments within the Borough. It does not therefore allocate or safeguard any land or sites for net additional dwellings or other types of development 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 that the Affordable Housing 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	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 &

	<p>Great Park SAC, given the findings of the Council’s air quality evidence.</p> <p>The Affordable Housing SPD provides guidance for delivering already adopted development plan policies at a higher tier (the Runnymede 2030 Local Plan) with the aim of securing planning obligations and affordable housing from new developments within the Borough.</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 that the Affordable Housing 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 Affordable Housing SPD provides guidance for delivering already adopted development plan policies at a higher tier (the Runnymede 2030 Local Plan) with the aim of securing planning obligations and affordable housing from new developments within the Borough.</p> <p>It does not however set targets for new developments or allocate or safeguard any land or sites for development including water related infrastructure projects such as the River Thames Scheme or site-specific flood/drainage projects. This is the role of the higher tier Local Plan and as such there are no pathways for effect for impacts either alone or in-combination with other plans and projects.</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 that the Affordable Housing 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>

3.8 It is the conclusion of this HRA that following a screening assessment it can be ascertained, in the light of the information available at the time of assessment and

even in the absence of avoidance and mitigation measures that the Affordable Housing 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.

#### 4.0 The SEA Screening Process

4.1 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 1.23 to 1.31 of this screening assessment).

4.2 However, the main determining factor when considering whether a plan or programme requires SEA is whether it will have significant environmental effects.

4.3 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.

4.4 This Screening Report sets out the Council's final determination under Regulation 9(1) of the Environmental Assessment of Plans and Programmes Regulations 2004 on whether or not SEA is required for the Affordable Housing 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 and how the Council has taken these into account in this final screening determination are set out below in **Table 1-8**.

**Table 1-8 Consultation responses from the Statutory Consultees**

<b>Statutory Body</b>	<b>Response</b>	<b>Comment &amp; Action</b>
Environment Agency (EA)	No response received.	No change
Historic England (HE)	In the light of the Environmental Assessment of Plans and Programmes Regulations 2004, our view is that a SEA <u>is not</u> required in this instance for the reasons set out in paragraph 4.8 of the Affordable Housing Supplementary Planning Document Strategic Environmental Assessment Screening	No change



	Statement (October 2021).	
Natural England (NE)	Natural England agrees that The Affordable Housing SPD is unlikely to give rise to significant environmental effects and as such an SEA is <u>not</u> required.	No change.

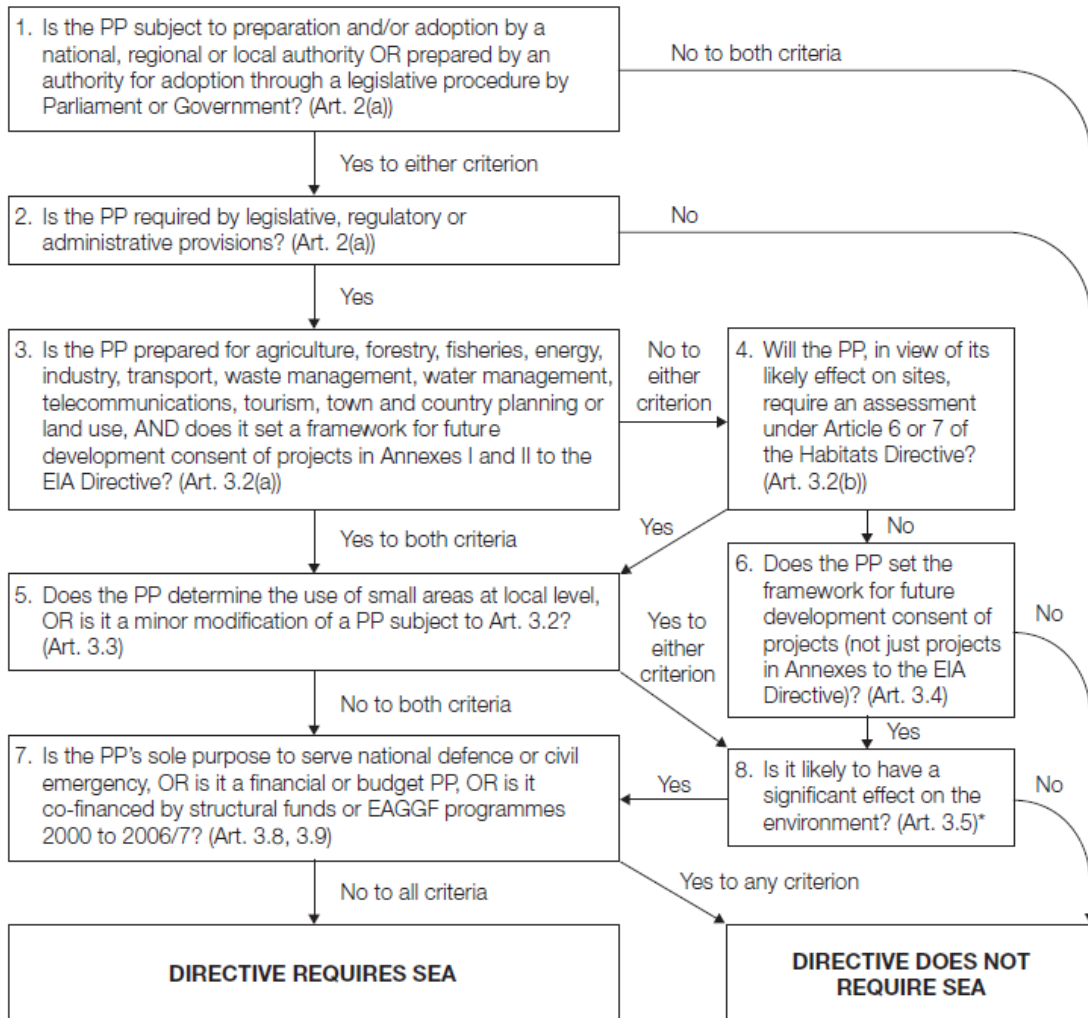
4.5 This draft determination is based on a two-step approach, the first of which is to assess the plan against the flowchart as set out in government guidance A Practical Guide to the Strategic Environmental Assessment Directive<sup>1</sup>. The flow chart is shown in Figure 1.

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<sup>1</sup> 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.

- 4.6 The second step is to consider whether the Affordable Housing 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 1-9 and 1-10.
- 4.7 The second step is to consider whether the Affordable Housing 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 1-9 and 1-10.

**Table 1-9: SEA Screening Step 1**

Stage in Flowchart	Y/N	Reason
<p>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))</p>	Y	<p>The provision to prepare and adopt a Local Development Document is given by the Planning &amp; Compulsory Purchase Act 2004 (as amended). The Affordable Housing SPD will be prepared and adopted by Runnymede Borough Council. The preparation and adoption procedure is set out in the Town &amp; 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.</p> <p><b>Move to Stage 2</b></p>
<p>2. Is the plan/programme required by legislative, regulatory or administrative provisions? (Article 2(a))</p>	N	<p>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.</p> <p><b>As answer is No, flowchart identifies end to screening process, but move to Stage 3 for completeness.</b></p>
<p>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))</p>	N	<p>Whilst the SPD has been prepared for town and country planning purposes, it does not set policy. The policies that the SPD supplements have been subject to SA/ SEA.</p> <p><b>Move to Stage 4.</b></p>

<p>4. Will the plan/programme, in view of its likely effect on sites, require an assessment under Article 6 or 7 of the Habitats Directive? (Article 3.2(b))</p>	<p>N</p>	<p>The HRA screening undertaken in paragraphs 3.1 to 3.8 of this assessment has determined that Appropriate Assessment is not required. <b>Move to Stage 6.</b></p>
<p>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)</p>	<p>N/A</p>	<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><b>Flowchart identifies moving to stage 7 but move to Stage 6 for completeness</b></p>
<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)</p>	<p>N</p>	<p>The SPD does not allocate any land or sites for development or set a framework for future development consents.</p> <p><b>As answer is No, flowchart identifies end to screening process, but move to Stage 8 for completeness.</b></p>
<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)</p>	<p>N</p>	<p>The sole purpose of the SPD is not to serve national defence or civil emergency. The SPD is not a budget plan or programme and it is not co-financed by structural funds or EAGGF programmes 2000 to 2006/7.</p>
<p>8. Is it likely to have a significant effect on the environment? (Article 3.5)</p>	<p>N</p>	<p>Effects on the environment and whether these are significant are considered in Table 1-10.</p> <p><b>No Significant Effects identified in Table 1-10, so determine that SEA is not required.</b></p>

**Table 1-10: SEA Screening Step 2**

<b>Criteria (from Annex II of SEA Directive and Schedule I of the Regulations)</b>	<b>Response</b>	
<b>Characteristics of the plan or programme</b>		<b>Significant Effect?</b>
(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 Affordable Housing SPD 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 guidance provided in the SPD is intended to supplement the policies contained in the Runnymede 2030 Local Plan so that applicants are clear about the Council's expectations and so as to ensure effective and consistent implementation of the relevant affordable housing policies.</p> <p>Whilst the nature of development could be said to be influenced by the SPD, this is only with respect to providing more detailed guidance to that already set out in the higher tier Local Plan policies. As such, it is considered that the 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 Affordable Housing 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 Affordable Housing SPD is highly relevant in terms of promoting sustainable development as it seeks to ensure the effective and consistent implementation of affordable housing policies, the aim of which is to provide a range of options to meet the housing needs of the different communities in Runnymede.	N
(d) Environmental problems relevant to the	Environmental problems include potential recreational or urbanising impacts, atmospheric pollution and water resources to European sites. Paragraphs 3.1 to 3.8 of this assessment sets out	N

plan or programme.	the effects of the SPD on European sites and has determined no significant effects.	
(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 Affordable Housing SPD provides guidance on the effective and consistent implementation of Affordable Housing policies in the adopted Runnymede 2030 Local Plan. The SPD does not, allocate any land/development or go beyond the requirements of the 2030 Local Plan and as a consequence its relevance for the implementation of Community (EU) legislation on the environment is likely to be limited.	N
<b>Characteristics of the effects and of the area likely to be affected</b>		
(a) The probability, duration, frequency and reversibility of the effects.	The Affordable Housing SPD seeks to ensure the effective and consistent implementation of affordable housing policies, which in themselves should ensure positive effects relating to affordability within the housing market and access to home ownership for current and future generations. It does not however allocate any land or sites for development or go beyond the requirements of the 2030 Local Plan.	N
(b) The cumulative nature of the effects	The Affordable Housing SPD does not allocate any land or sites for development or go beyond the requirements of the 2030 Local Plan Taken with the allocation of sites 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 and change. Cumulative effects are likely to last over the plan period and beyond but could be reversible depending on future iterations of the Local Plan and its priorities. On the whole however, effects are not considered to be significant.	N
(c) The transboundary nature of the effects	The Affordable Housing SPD is not expected to give rise to any significant transboundary environmental effects. However, where strategic sites are in close proximity to neighbouring settlements, the provision of affordable housing will assist in providing housing choices for residents from a wider area as well as from within Runnymede's communities.	N
(d) The risks to human health or the environment (for example,	There are no anticipated effects of the SPD on human health.	N

due to accidents)		
(e) The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)	The Affordable Housing SPD will cover the whole of the geographic area of Runnymede in Surrey. The area covered is 78km <sup>2</sup> with a population of around 83,448. The effective and consistent implementation of affordable housing policies will have positive benefits for Runnymede residents and those who wish to move to Runnymede.	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.	<p>Given the nature of the Affordable Housing SPD:</p> <p>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, set development targets or go beyond the requirements of the 2030 Local Plan and therefore significant effects on natural characteristics and cultural heritage are unlikely.</p> <p>ii) There are two Air Quality Management Areas (AQMAs) in the Runnymede area, along the entire length of the M25 which runs 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 area<sup>2</sup>. 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, set development targets or go beyond the requirements of the 2030 Local Plan 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</p>	N

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

	land or sites for development. As such, significant effects are unlikely.	
(g) The effects on areas or landscapes which have recognised national, community or international protection status.	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.	N
<b>Conclusion</b>	<b>The Affordable Housing SPD is unlikely to give rise to significant environmental effects and as such an SEA is not required.</b>	

- 4.8 On the basis of the Screening process, it is determined that the Affordable Housing 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 go beyond the requirements of the 2030 Local Plan; and
  - The content of the SPD when taken as a whole and in combination with policies in the emerging 2030 Local Plan will not give rise to significant effects.
- 4.9 This final assessment was made on the 7<sup>th</sup> March 2022. A number of minor amendments were made to the earlier assessment, undertaken on the 25<sup>th</sup> October 2021. These changes were primarily to take account of the comments received from the statutory consultees and to also respond to a point raised at the Committee Meeting on 24<sup>th</sup> November 2021 that a reference should be included in Table 1.1 of the final assessment, under Other Key Plans/ Projects, to the ‘made’ Thorpe Neighbourhood Plan. This change has been made to the screening report.
- 4.10 A further change that was suggested at the Committee Meeting on the 24<sup>th</sup> November 2021 was that in Table 1.10 in SEA -characteristics of the effects and of the area likely to be affected- (f) AQMAs-add ‘additional’ in last sentence of response ii. This change has not been made to the final assessment as it is not considered that this change would be factually correct. The sentence in the earlier assessment stated that “the SPD does not allocate any land for development”. This statement is correct. It is the Runnymede 2030 Local Plan which allocates sites for development (see para. 1.7 above). The allocated sites from the Local Plan have already been subject to SEA/HRA as part of the Local Plan process. SPDs can only provide guidance on adopted policies and not allocate land for development. It would therefore be incorrect to insert the word ‘additional’ in this sentence.
- 4.11 The conclusions of the assessment remain unaltered by these updates to the screening report.