

Runnymede Borough Council

Revocation of

**Addlestone Town Centre Strategy (1999)
Residential Extensions & Replacement Dwellings in the Green Belt (2004)
Trees, Woodlands and Hedgerows (2003)**

Supplementary Planning Guidance (SPG)

Habitats Regulations Assessment (HRA)

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

Strategic Environmental Assessment (SEA)

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

March 2023

1.1 INTRODUCTION

General

- 1.1.1 This Habitats Regulations Assessment (HRA) and Strategic Environmental Assessment (SEA) screening determination has been undertaken by Runnymede Borough Council in their duty to determine whether the revocation of the Addlestone Town Centre Strategy, Residential Extensions and Replacement Dwellings in the Green Belt and Trees, Woodlands & Hedgerows Supplementary Planning Guidance (SPG) documents requires HRA or SEA.
- 1.1.2 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.
- 1.1.3 Under the requirements of the Environmental Assessment of Plans & Programmes Regulations (2004), specific types of plan that set the framework for the future development consent of projects or which require Appropriate Assessment must be subject to an environmental assessment.
- 1.1.4 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.
- 1.1.5 In accordance with the provisions of 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 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.
- 1.1.6 Whilst the Council is not preparing plans in this instance, but instead revoking guidance in the form of adopted SPG, it is considered prudent to undertake an SEA/HRA screening to consider the effects of their revocation as the guidance will not be wholly replaced by other supplementary guidance or documents.

1.2 Background to the Addlestone Town Centre Strategy, Residential Extensions & Replacement Dwellings in the Green Belt and Trees, Woodlands & Hedgerows SPGs

- 1.2.1 The Planning & Compulsory Purchase Act 2004 (as amended) makes provision for local authorities to prepare and adopt Local Development Documents (LDDs). Section 25 of the Act also sets out that Regulations may prescribe the LDDs which can be revoked by local authorities. LDDs include SPDs.
- 1.2.2 The Town & Country Planning (Local Planning) (England) Regulations 2012, sets out in Regulation 15(2) that a local planning authority can revoke any SPD and 15(3) that in doing so, as soon as reasonably practicable cease to make the revoked SPD available and take such

steps as considered necessary to draw the revocation of the SPD to the attention of persons living or working in the area.

- 1.2.3 Whilst SPGs were prepared and adopted prior to the 2004 Act, they were rolled forward when the Runnymede Local Plan (2001) policies were saved and continued to be a material consideration post 2004, until the adoption of the current 2030 Local Plan. As such, the process for revoking SPDs set out in the 2004 Act and 2012 Regulations is considered to be applicable to SPGs.

Addlestone Town Centre Strategy SPG

- 1.2.4 The Addlestone Town Centre Strategy SPG was adopted by the Council in 1999. The SPG sets out the role of the town centre and defines the 'shopping core' of the centre, realigning its extent by removing no's 154-188 (evens) Station Road from the core area. The SPG sets out policy for the change of use of premises within the core area restricting changes from A1 (retail) to A2 (financial and professional services) and A3 (hot food takeaway), aside from certain circumstances. It should be noted that use classes expressed in the SPG have since been updated in subsequent Use Class Orders and therefore references made to A1, A2 and A3 are out of date.
- 1.2.5 The SPG extends the area to which a now superseded Local Plan Policy MV10 (town centre car parking standards) applied. Most of the area extending car parking standards has since been redeveloped at the Aviator Park site on Station Road with residential/office development. The SPG also identifies character areas and sets out design guidance in this respect (building frontages, heights, building lines, architectural detailing) as well as enhancements to the town centre through developer contributions.
- 1.2.6 The SPG also identifies four potential development sites, all of which have now been redeveloped.
- 1.2.7 The adopted 2030 Local Plan sets out revised town centre boundaries for Addlestone including identification of primary and secondary shopping areas and shopping frontages as well as permissible changes of use in these areas. As such the 'core' shopping area identified in the SPG and change of use guidance has been superseded by Policy IE6 (Town Centre Development). Parking standards have also been revised since the SPG was produced and are included in the Runnymede Parking Guidance SPD which was adopted in November 2022. Design is now covered in the adopted 2030 Local Plan under Policy EE1 (Townscape & Landscape Quality) supported by a Design SPD adopted on 23 June 2021.
- 1.2.8 The 2030 Local Plan was supported by a Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) as well as a Habitats Regulations Assessment (HRA). The Design SPD and Parking Guidance SPD were also subject to a SEA/HRA screening determination, the outcome of which (in both cases), following consultation with the three statutory bodies was that SEA/HRA was not required.

Residential Extensions & Replacement Dwellings in the Green Belt

- 1.2.9 The Residential Extensions & Replacement Dwellings in the Green Belt SPG was adopted by the Council in 2004 and supported Local Plan Policy GB6 (Rebuilding of Dwellings and Residential Extensions in the Green Belt). The SPG sets out guidance on how Policy GB6 should be interpreted in terms of calculating gross floor area of buildings/extensions, withdrawing permitted development rights, extent of residential curtilage and how floor area of outbuildings will be taken into account.
- 1.2.10 Policy GB6 has now been superseded by adopted 2030 Local Plan Policy EE14 (Extensions & Alterations to and Replacement of Buildings in the Green Belt). The adopted Design SPD is also applicable to development within the Green Belt.

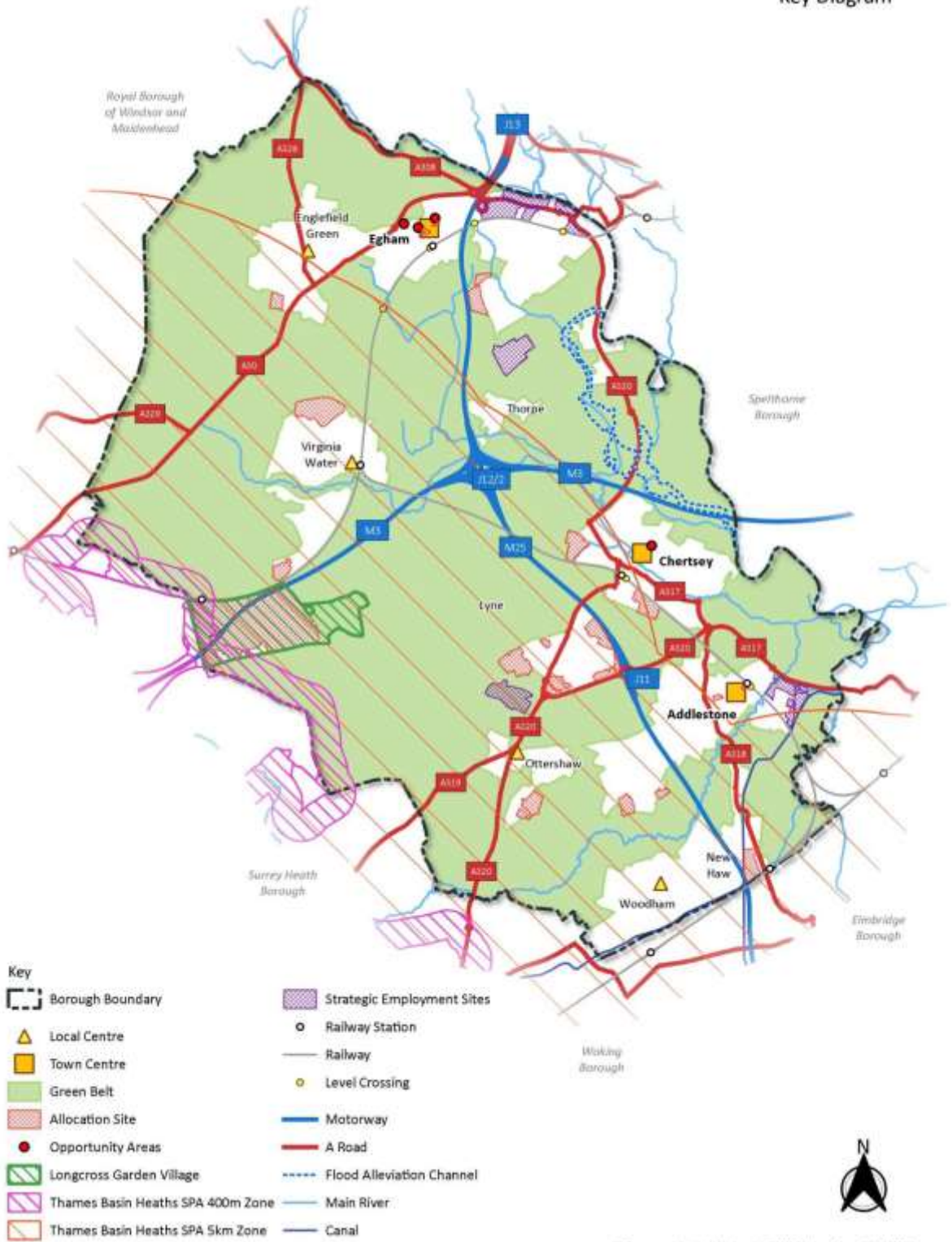
Trees, Hedgerows and Woodlands

- 1.2.11 The Trees, Hedgerows and Woodlands SPG was adopted by the Council in 2003. The SPG sets out a series of FAQs with respect to trees, hedgerows and woodlands and how these will be treated in planning applications and details to be provided.
- 1.2.12 The SPG supported Policies NE12 (Protection of Trees), NE13 (Tree Preservation Orders) and NE14 (Trees & Development Proposals) of the 2001 Local Plan, all of which have been superseded by the adopted 2030 Local Plan Policy EE11 (Green Infrastructure). Further guidance supporting Policy EE11 is also set out in an adopted Green & Blue Infrastructure SPD adopted by the Council on 24 November 2021. The SPD was subject to a SEA/HRA screening determination the outcome of which following consultation with the three statutory bodies was that SEA/HRA was not required.
- 1.2.13 All three SPGs cover the area within the jurisdiction of Runnymede Borough Council. The Borough 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**.
- 1.2.14 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.
- 1.2.15 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.

- 1.2.16 Langham Pond SSSI is formed of 3 units. 100% of the SSSI is in a favourable condition status, meeting the PSA target. The Thorpe Haymeadow SSSI is formed of one unit in a favourable condition, which also meets the PSA Target.
- 1.2.17 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, which forms part of the National Site Network of protected sites.
- 1.2.18 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 National Site Network site.
- 1.2.19 Other National Site Network sites, whilst not within the Borough but are within 5km include, the Thames Basin Heaths Special Protection Area and Thursley, Ash, Pirbright & Chobham SAC. Chobham Common is also a National Nature Reserve (NNR).
- 1.2.20 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.

Plan 1-1: Map of Runnymede Borough

Runnymede Borough Key Diagram



- 1.2.21 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.
- 1.2.22 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.
- 1.2.23 The three SPGs do not in themselves form part of the Development Plan for the area and do not allocate any sites for development or propose policies for the use of land. Whilst the Addlestone Town Centre Strategy does identify potential sites for development, these have since been redeveloped and the change of use guidance has been superseded. 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).

1.3 Sustainability Appraisal

- 1.3.1 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 (and ergo SPGs) are not Local Plan documents and therefore a Sustainability Appraisal for their revocation is not required.

2.0 HABITATS REGULATIONS ASSESSMENT – SCREENING

2.1 Assessment Process

2.1.1 The need to undertake an Appropriate Assessment as part of an HRA is set out within 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.

2.1.2 The Conservation of Habitats & Species Regulations require that any plan or project likely to have a significant effect on a National Site Network site must be subject to an Appropriate Assessment. The Regulations state 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. As a matter of prudence the Council is also applying this to the revocation of the SPGs identified in this screening determination. There are four distinct stages in HRA namely:

- **Step 1: Screening** – Identification of likely impacts on a National Site Network site either alone or in combination with other plans/projects and consideration of whether these are significant. Following the decision of the ECJ in the People Over Wind & Sweetman v. Coillite Teoranta (C-323/17) case, avoidance and/or mitigation measures cannot be taken into account at the screening stage and it is purely an exercise to determine if possible pathways for effect exist and whether these can be ruled out taking account of the precautionary principle. It is the opinion of this HRA screening assessment 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 National Site Network 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** – consideration of the impact on the integrity of the National Site Network site whether alone or in combination with other plans or projects with respect to the sites structure, function and conservation objectives. Where there are significant effects, step 2 should consider potential 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.

2.1.3 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.

2.2 Step 1 - Screening

2.2.1 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

2.2.2 It can be determined that the Addlestone Town Centre, Residential Extensions & Replacement Dwellings in the Green Belt and Trees, Hedgerows & Woodlands SPGs are not directly connected with or necessary to the management of a National Site Network site.

Stage 2

2.2.3 Information about the three SPGs can be found in paragraphs 1.2.1 to 1.2.12 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

National Planning Policy Framework (2021): High level national planning policy covering topics such as housing, economy, employment, retail as well as biodiversity, flood risk and heritage.

South East Plan 2009: Saved Policy NRM6 sets out protection for the Thames Basin Heaths SPA.

London Plan 2021: Contains planning policies for the development of land across the wider London area including housing and employment allocations with a target of 52,000 new homes per annum (2019/20 – 2028/29).

Runnymede 2030 Local Plan: 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.

Thorpe Neighbourhood Plan: Sets local policies for the consideration of issues such as design, heritage, green/blue infrastructure, housing mix within the Thorpe Neighbourhood Area in addition to the Runnymede 2030 Local Plan. Also allocates a number of small sites for housing development for up to 74 dwellings. The Thorpe Neighbourhood Plan was subject to SEA & HRA.

Other Local Authority Local Plans within 10km or adjoining sites identified in Section 2.2: Housing target for areas around National Site Network sites set out in **Table 1-2**.

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.

Thames Basin Heaths Joint Delivery Framework 2009: Sets out the agreed Framework regarding the approach and standards for avoiding significant effects on the Thames Basin Heaths SPA.

Environment Agency, Thames River Basin District Management Plan (2015): Sets out actions to improve water quality. Future aims for the River Wey include implementing Lower Wey Oxbow Restoration Project to enhance and restore the main Wey river channel and Wey Diffuse Advice Project throughout the catchment.

Environment Agency, Thames Catchment Flood Management Plan (2009): Aim is to promote more sustainable approaches to managing flood risk. Will be delivered through a combination of different approaches.

Environment Agency, River Wey Catchment Abstraction Management Strategy (2019): identifies the Wey having restricted 'Water available for licensing'.

Environment Agency, Thames Abstraction Licensing Strategy (2019): Identifies the Thames having restricted 'Water available for licensing'.

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.

Table 1-2: List of Local Authority Housing Targets within 10km of National Site Network 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	14,240
	Wokingham Borough	13,230
	Rushmoor Borough	8,884
	Hart District	6,208
Total		95,088
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	14,240
	Bracknell Forest Borough	11,139
	Slough Borough	6,250
	South Bucks District	2,800
	LB Hillingdon	10,830
	LB Hounslow	17,820
Total		85,898
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	14,240
	Slough Borough	6,250
	Bracknell Forest Borough	11,139
	South Bucks District	2,800
	LB Hillingdon	10,830
	LB Hounslow	17,820
	LB Ealing	21,570
	LB Kingston	9,640
LB Richmond	4,110	
Total		120,406

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

Stage 3

2.2.4 Information regarding the National Site Network site(s) screened and the likely effects that may arise due to revocation of the three SPGs can be found in **Tables 1-3 to 1-6** and **Table 1-7**. All other National Site Network 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

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 revocation of the Addlestone Town Centre, Residential Extensions & Replacement Dwellings in the Green Belt and	<ul style="list-style-type: none"> • None (see Table 1-7)

Trees, Hedgerows & Woodlands SPGs	
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Table 1-4: Details of Thursley, Ash, Pirbright & Chobham SAC and Potential Effects

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 revocation of the Addlestone Town Centre, Residential Extensions & Replacement Dwellings in the Green Belt and Trees, Hedgerows & Woodlands SPGs	<ul style="list-style-type: none"> • None (see Table 1-7)

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

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	Annex I habitat of oak woods on sandy plain which is the primary reason for designation with Atlantic beech forests.

conservation features:	
Environmental Conditions which Support the Site	<ul style="list-style-type: none"> • Loss of trees through forestry management • Urbanisation • Managed recreational pressure • Air Quality
Potential Effects arising from revocation of the Addlestone Town Centre, Residential Extensions & Replacement Dwellings in the Green Belt and Trees, Hedgerows & Woodlands SPGs	<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

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:- <ul style="list-style-type: none"> • 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 revocation of the Addlestone Town Centre, Residential Extensions & Replacement Dwellings in the Green Belt and Trees, Hedgerows & Woodlands SPGs	<ul style="list-style-type: none"> • None (see Table 1-7)

Stage 4

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

Table 1-7: Assessment of Potential Effects

<p>Indirect effect from recreational disturbance and urbanisation.</p>	<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 & 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 Addlestone Town Centre Strategy SPG contains guidance and advice for developers pertaining to development within Addlestone Town Centre focussing on the extent of the Core shopping area, change of use and</p>
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	<p>design as well as identifying potential development sites. The guidance on design, core shopping area, parking and change of use within the SPG has been superseded by other adopted policies or guidance and are therefore no longer a material consideration in decision taking. The potential development sites identified have also now been redeveloped.</p> <p>The Residential Extensions and Replacement of Dwellings in the Green Belt SPG and Trees, Hedgerows & Woodlands SPG contain guidance on technical interpretation of superseded Local Plan Green Belt policy and the Council's approach to trees within development proposals. The SPGs do 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. Neither do the SPGs set policy for guiding the quantity or location of development.</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 revocation of all three SPGs will not give rise to likely significant effects on any of the National Site Network sites in terms of recreation or urbanisation. In this respect an Appropriate Assessment is not required.</p>
Atmospheric Pollution	<p>The Runnymede 2030 Local Plan HRA concludes no likely significant effect as a result of atmospheric pollution in combination with other plans and projects on the Thames Basin Heaths SPA, 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 Addlestone Town Centre Strategy SPG contains guidance and advice for developers pertaining to development within Addlestone Town Centre focussing on the extent of the Core shopping area, change of use and design as well as identifying potential development sites. The guidance on design, core shopping area, parking and change of use within the SPG has been superseded by other adopted policies or guidance and are therefore no longer a material consideration in decision taking. The potential development sites identified have also now been redeveloped.</p>

	<p>The Residential Extensions and Replacement of Dwellings in the Green Belt SPG and Trees, Hedgerows & Woodlands SPG contain guidance on technical interpretation of superseded Local Plan Green Belt policy and the Council’s approach to trees within development proposals. The SPGs do 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 air quality impacts. Neither do the SPGs set policy for guiding the quantity or location of development.</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 revocation of the three SPGs will not give rise to likely significant effects on any of the National Site Network sites in terms of air quality. 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 Addlestone Town Centre Strategy SPG contains guidance and advice for developers pertaining to development within Addlestone Town Centre focussing on the extent of the Core shopping area, change of use and design as well as identifying potential development sites. The guidance on design, core shopping area, parking and change of use within the SPG has been superseded by other adopted policies or guidance and are therefore no longer a material consideration in decision taking. The potential development sites identified have also now been redeveloped.</p> <p>The Residential Extensions and Replacement of Dwellings in the Green Belt SPG and Trees, Hedgerows & Woodlands SPG contain guidance on technical interpretation of superseded Local Plan Green Belt policy and the Council’s approach to trees within development proposals. The SPGs do 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 water quality or resource impacts. Neither do the SPGs set policy for guiding the quantity or location of development.</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</p>

	<p>the screening stage of HRA (including any adopted policies in the Local Plan Part 1 or emerging 2030 Local Plan) that the revocation of the three SPGs will not give rise to likely significant effects on any of the National Site Network sites in terms of water quality or resource. In this respect an Appropriate Assessment is not required.</p>
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2.3 Conclusion

2.3.1 It is the conclusion of this 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 revocation of the Addlestone Town Centre Strategy, Residential Extensions & Replacement Dwellings in the Green Belt and Trees, Hedgerows & Woodlands SPGs **will not** give rise to significant effects on National Site Network sites either alone or in-combination with other plans and/or projects. Given the findings of the screening assessment it is considered that a full appropriate assessment is not required.

2.3.2 This assessment was made on the 9 March 2023.

3.0 STRATEGIC ENVIRONMENTAL ASSESSMENT – SCREENING

3.1 Assessment Process

3.1.1 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 **Section 2** of this screening assessment).

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

3.1.3 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.

3.1.4 This 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 revocation of the Addlestone Town Centre Strategy, Residential Extensions & Replacement Dwellings in the Green Belt and Trees, Hedgerows & Woodlands SPGs. The Borough Council must consult with the three statutory bodies (Environment Agency, Historic England and 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 screening determination are set out in Table 1-8.

Table 1-8: Statutory Bodies Consultation

Statutory Body	Response	Comment & Action
Environment Agency	Agree with the conclusion that the revocation of the three SPGs is unlikely to give rise to significant environmental effects.	Noted.
Historic England	Our view is that SEA is not required in this instance for the reason set out in paragraph 3.4.1 of the screening statement.	Noted.
Natural England	Natural England supports the conclusion of the screening that a SEA will not be required. Natural England is also in agreement with the conclusion of the HRA that the revocation of the three SPGs will not give rise to significant effects on European Sites either alone or in-combination with other plans and/or projects and that given the findings of the screening assessment, it is considered that a full Appropriate Assessment is not required.	Noted.

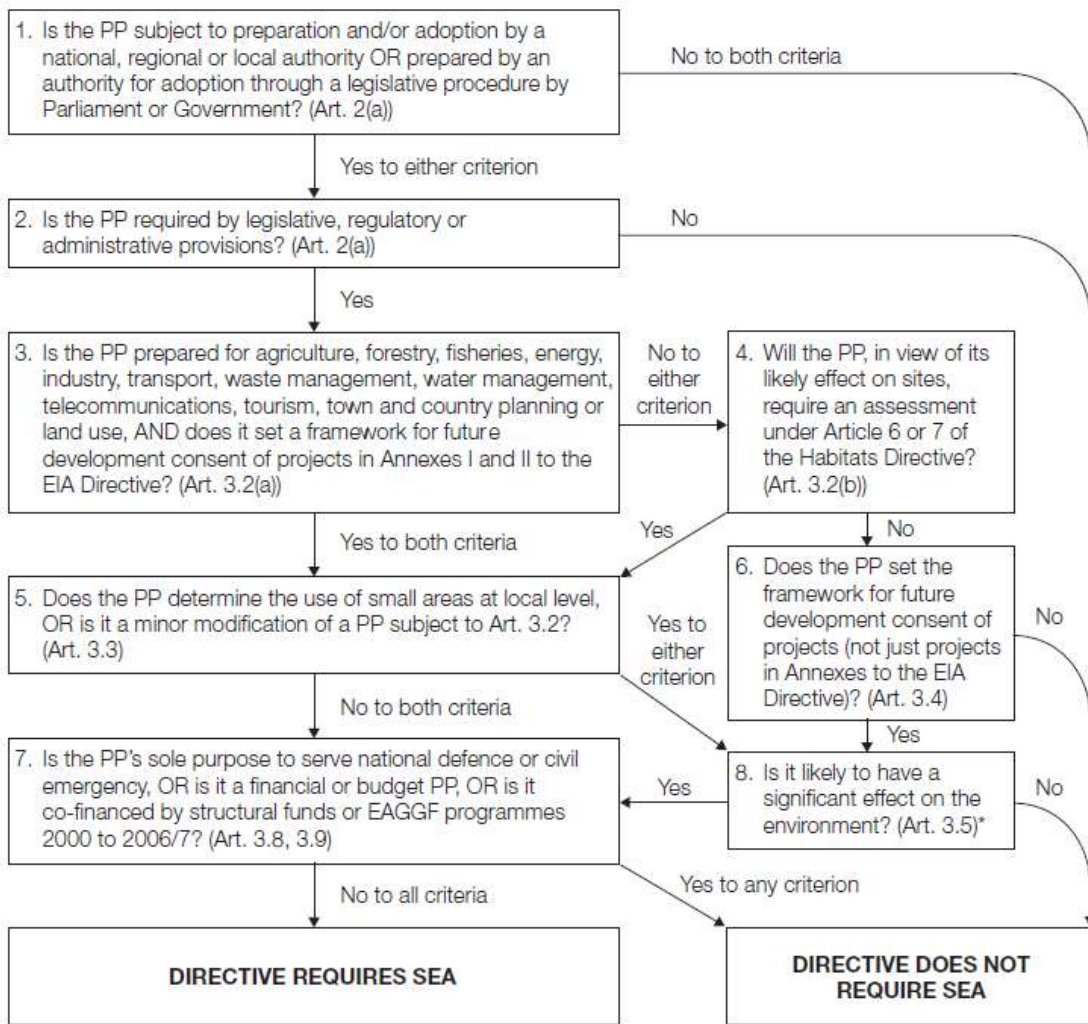
3.1.5 The determination is based on a two-step approach, the first of which is to assess the revocation of the SPGs against the flowchart as set out in government guidance A Practical Guide to the Strategic Environmental Assessment Directive¹. The flow chart is shown in **Figure 1**.

3.1.6 The second step is to consider whether the revocation of the SPGs will have significant environmental effects when considered against the criteria set out in Schedule 1 of the Regulations.

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: SEA Flow Chart

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.

3.2 Step 1

3.2.1 The findings of step 1 are shown in **Table 1-9**.

Table 1-9: 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, adopt and revoke Local Development Documents is given by the Planning & Compulsory Purchase Act 2004 (as amended) and the Town & Country Planning (Local Planning)(England) Regulations 2012. The Addlestone Town Centre Strategy, Residential Extensions & Replacement Dwellings in the Green Belt and Trees, Hedgerows & Woodlands SPGs will be revoked by Runnymede Borough Council. The revocation procedure is set out in the Town & Country Planning (Local Development) (England) Regulations 2012. The SPGs do not form part of the Development Plan and are largely superseded by later adopted policy & guidance. 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, adopt or revoke SPGs. 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 SPGs were prepared for town & country planning, the SPGs do 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, require an	N	The HRA screening undertaken in Section 2 of this assessment has

Stage in Flowchart	Y/N	Reason
assessment under Article 6 or 7 of the Habitats Directive? (Article 3.2(b))		determined that Appropriate Assessment is not required for the revocation of the SPGs. 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	The SPGs do not form part of the Runnymede Development Plan and do not therefore determine the use of small areas at a local (or any) level. Whilst the Addlestone Town Centre Strategy SPG identified potential development sites, these have now been redeveloped since the adoption of the SPG and the guidance set out therein is now defunct. The SPGs are not a minor modification of an existing plan. Move to Stage 6
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	The SPGs do not allocate any land or sites for development or set a framework for future development consents. Whilst the Addlestone Town Centre Strategy SPG identified potential development sites, these have now been redeveloped since the adoption of the SPG and the guidance set out therein is now defunct. As answer is No, flowchart identifies end to screening process, but move to Stage 8 for completeness.
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	The sole purpose of the SPGs is not to serve national defence or civil emergency.
8. Is it likely to have a significant effect on the environment? (Article 3.5)	N	Effects on the environment and whether these are significant are considered in Table 1-10 .

Stage in Flowchart	Y/N	Reason
		No Significant Effects identified in Table 1-10, so determine that SEA is not required.

3.3 Step 2

3.3.1 The findings of step 2 are shown in **Table 1-10**.

Table 1-10: 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 Addlestone Town Centre Strategy SPG contains guidance and advice for developers pertaining to development within Addlestone Town Centre focussing on the extent of the Core shopping area, change of use and design as well as identifying potential development sites. The guidance on design, core shopping area, parking and change of use within the SPG has been superseded by other adopted policies or guidance and are therefore no longer a material consideration in decision taking. The potential development sites identified have also now been redeveloped and as such the SPG does not set the framework for projects or other activities.</p> <p>The Residential Extensions and Replacement of Dwellings in the Green Belt SPG and Trees, Hedgerows & Woodlands SPG contain guidance on technical interpretation of superseded Local Plan Green Belt policy and the Council's approach to trees within development proposals. The SPGs do not allocate or safeguard any land or sites for net additional dwellings or other types of development including infrastructure projects and do not therefore set the framework for projects or other activities.</p>		N
(b) The degree to which the plan or programme influences other plans and programmes including those in a hierarchy.	The SPGs do not influence other plans or programmes but are themselves influenced by other plans or programmes. They therefore do not influence any plans in a hierarchy.		N
(c) The relevance of the plan or programme for the	The Addlestone Town Centre Strategy SPG contains guidance and advice for developers pertaining to development within Addlestone		N

Criteria (from Annex II of SEA Directive and Schedule I of the Regulations)	Response	
<p>integration of environmental considerations, in particular with a view to promoting sustainable development.</p>	<p>Town Centre focussing on the extent of the Core shopping area, change of use and design as well as identifying potential development sites. The guidance on design, core shopping area, parking and change of use within the SPG has been superseded by other adopted policies or guidance and are therefore no longer a material consideration in decision taking. The potential development sites identified have also now been redeveloped. As such the SPG is not relevant to the integration of environmental considerations with a view to promoting sustainable development.</p> <p>The Residential Extensions and Replacement of Dwellings in the Green Belt SPG and Trees, Hedgerows & Woodlands SPG contain guidance on technical interpretation of superseded Local Plan Green Belt policy and the Council's approach to trees within development proposals. Given that Green Belt policy has been superseded since the adoption of the Residential Extensions and Replacement of Dwellings in the Green Belt SPG, there is no relevance to integration of environmental considerations with a view to promoting sustainable development.</p> <p>The guidance on trees, hedgerows and woodlands has some relevance to the integration of environmental considerations with a view to promoting sustainable development, but revocation of the SPG is unlikely to lead to significant effects given that more recent policy and guidance has been adopted through the 2030 Local Plan and GBI SPD.</p>	
<p>(d) Environmental problems relevant to the plan or programme.</p>	<p>Environmental problems include potential recreational or urbanising impacts, atmospheric pollution and water resources to National Site Network sites. Section 2.0 of this assessment sets out the effects of revoking the SPGs on National Site Network sites and has determined no significant effects.</p>	<p>N</p>

Criteria (from Annex II of SEA Directive and Schedule I of the Regulations)	Response	
(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).	<p>The Addlestone Town Centre Strategy SPG contains guidance and advice for developers pertaining to development within Addlestone Town Centre focussing on the extent of the Core shopping area, change of use and design as well as identifying potential development sites. The guidance on design, core shopping area, parking and change of use within the SPG has been superseded by other adopted policies or guidance and are therefore no longer a material consideration in decision taking. The potential development sites identified have also now been redeveloped. As such the SPG is not relevant to the implementation of EU legislation on the environment.</p> <p>The Residential Extensions and Replacement of Dwellings in the Green Belt SPG and Trees, Hedgerows & Woodlands SPG contain guidance on technical interpretation of superseded Local Plan Green Belt policy and the Council's approach to trees within development proposals. Given that Green Belt policy has been superseded since the adoption of the Residential Extensions and Replacement of Dwellings in the Green Belt SPG, the SPG is not relevant to the implementation of EU legislation on the environment.</p> <p>The guidance on trees, hedgerows and woodlands has some relevance but revocation of the SPG is unlikely to lead to significant effects given that more recent policy and guidance has been adopted through the 2030 Local Plan and GBI SPD which will be more up to date with legislation.</p>	N
Characteristics of the effects and of the area likely to be affected		
(a) The probability, duration, frequency and reversibility of the effects.	<p>The Addlestone Town Centre Strategy SPG contains guidance and advice for developers pertaining to development within Addlestone Town Centre focussing on the extent of the Core shopping area, change of use and design as well as identifying potential development sites. The</p>	N

Criteria (from Annex II of SEA Directive and Schedule I of the Regulations)	Response	
	<p>guidance on design, core shopping area, parking and change of use within the SPG has been superseded by other adopted policies or guidance and are therefore no longer a material consideration in decision taking. The potential development sites identified have also now been redeveloped. As such, there is no longer a pathway for effects from revocation of the SPG in terms of probability, duration, frequency and reversibility.</p> <p>The Residential Extensions and Replacement of Dwellings in the Green Belt SPG and Trees, Hedgerows & Woodlands SPG contain guidance on technical interpretation of superseded Local Plan Green Belt policy and the Council's approach to trees within development proposals. Given that Green Belt policy and policies for protection of trees, hedgerows and woodlands has been superseded since the adoption of the SPGs and replaced by other policy and guidance there is no longer a pathway for effects from revocation of the SPGs in terms of probability, duration, frequency and reversibility.</p>	
(b) The cumulative nature of the effects	As set out above, given that policies supporting the three SPGs has been superseded and that the 2030 Local Plan and the mitigation measures set out therein as well in other adopted SPD cover the issues set out in the SPGs, cumulative effects of revocation are not considered to be significant.	N
(c) The transboundary nature of the effects	Given the geographic scope of the SPGs it is considered that no transboundary effects will arise from their revocation.	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	The three SPGs cover the whole of the geographic area of Runnymede in Surrey. The	N

Criteria (from Annex II of SEA Directive and Schedule I of the Regulations)	Response	
effects (geographical area and size of the population likely to be affected)	area covered is 78km ² with a population of around 88,100 ² . Given the nature of the SPGs and that they are based on superseded policies which have since been replaced by adoption of other policies and guidance it is considered that effects of revocation will not be significant.	
(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 SPGs:</p> <p>i) The area covered by the SPGs 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 policies supporting the SPGs have been superseded by more up to date policies and guidance which cover the issues set out in the SPGs. Therefore the effects of revocation of the SPGs on natural characteristics and also cultural heritage are unlikely to be significant.</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 7 air quality monitoring sites in the Runnymede area in 2019³. The Environment Agency has identified the Wey & Thames catchments as having restricted water available for licensing. However, the policies supporting the SPGs have been superseded by more up to date policies and guidance which cover the issues set out in the SPGs and therefore</p>	

N

² Census 2021

³ Runnymede 2020 Air Quality Annual Status Report (2020) RBC, Available at: <https://www.runnymede.gov.uk/pollution/air-quality-1/3>

Criteria (from Annex II of SEA Directive and Schedule I of the Regulations)	Response	
	<p>revocation is unlikely to give rise to significant effects.</p> <p>iii) Intensive land use occurs in the urban areas (built development), but the SPGs do not allocate any land or sites for development or safeguard any infrastructure projects. The potential development sites set out in the Addlestone Town Centre Strategy have now been redeveloped. As such significant effects of revocation of the three SPGs is unlikely given that the policies supporting these have been superseded by more up to date policy and guidance.</p>	
(g) The effects on areas or landscapes which have recognised national, community or international protection status.	<p>The effects on National Site Network 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>	N
Conclusion	<p>The revocation of the Addlestone Town Centre Strategy, Residential Extensions & Replacement Dwellings in the Green Belt and Trees, Hedgerows & Woodlands SPGs is unlikely to give rise to significant environmental effects and as such an SEA is not required.</p>	

3.4 Conclusion

3.4.1 On the basis of the Screening process it is determined that revocation of the Addlestone Town Centre Strategy, Residential Extensions & Replacement Dwellings in the Green Belt and Trees, Hedgerows & Woodlands SPGs does not require an SEA under the Environmental Assessment of Plans and Programmes Regulations (2004). This is because:

- Revocation is unlikely to give rise to significant environmental effects given that policies supporting the SPG have been superseded by more up to date policies and guidance covering the same issues;

3.4.2 This determination was made on the 9 March 2023.