

**Runnymede Borough Council**  
Indicative Climate Change Action Plan  
Strategic Environmental Assessment  
(SEA) & Habitats Regulations  
Assessment (HRA) - Screening  
Determination & Statement of  
Reasons

1 December 2023

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## 1. Introduction and Summary

- 1.1 In January 2022, Runnymede Borough Council (RBC) committed to tackling climate change and adopted a target to make all Council operations 'net zero carbon' by 2030. The Council's Climate Change Strategy also describes how the Council will work with local communities and businesses to achieve net zero emissions across the whole of Runnymede by 2050 in line with national targets. To deliver the objectives in the Climate Change Strategy, the Council has been developing a Climate Change Action Plan (CCAP).
- 1.2 The purpose of this report is to determine whether the CCAP should be subject to:
  - A Strategic Environmental Assessment (SEA) in accordance with European Directive 2001/42/EC (SEA Directive) and associated Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations); or
  - a Habitat Regulations Assessment (HRA) in accordance with Article 6(3) of the EU Habitats Directive and with Regulation 61 of the Conservation of Habitats and Species Regulations 2010.
- 1.3 Under the above legislation, an SEA is required for all plans which may have a significant effect on the environment; and an HRA is required when it is deemed that the implementation of the plan is likely to cause significant adverse effects upon protected European Sites (Natura 2000 Sites/National Network Sites).
- 1.4 The conclusion of the assessment is that the draft CCAP does not require full SEA or HRA to be conducted. Accordingly, RBC as the responsible/competent authority, drawing on feedback from statutory consultees, determines that no SEA and/or HRA assessment is required for the CCAP. Should the CCAP change significantly after formal public consultation, this conclusion will be revisited.

## 2. SEA Screening

- 2.1 Strategic Environmental Assessment (SEA) is a systematic process used during the preparation of plans and policies and it aims to provide a high level of protection for the environment; it contributes to the integration of environmental considerations in the plan preparation with a view to promoting sustainable development. Sustainability Appraisal (SA) is a process that similarly investigates plans and policies, including consideration of socio-economic factors in the same way as environmental factors and to the same level of detail.
- 2.2 The basis for SEA and SA legislation is European Directive 2001/42/EC (SEA Directive), transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations). Detailed guidance on applying these regulations is available in the Government publication 'A Practical Guide to the Strategic Environmental Assessment Directive' (ODPM 2005).
- 2.3 Under Regulation 2(1) of the SEA Regulations, a 'plan or programme' means those which are:
  - subject to preparation or adoption by an authority at national, regional or local level; or
  - prepared by an authority for adoption, through a legislative procedure by Parliament or Government; and, in either case;
  - required by legislative, regulatory or administrative provisions.

According to the ODPM guidance, “administrative provisions” are “likely to be that they are publicly available, prepared in a formal way, probably involving consultation with interested parties. The administrative provision must have sufficient formality such that it counts as a “provision” and it must also use language that plainly requires rather than just encourages a plan or programme to be prepared”.

- 2.4 There is no guidance definitively stating that a plan such as the CCAP should require SEA. However, the Council is legally obliged to advise on whether it is their opinion that an SEA is required or not.
- 2.5 In order to determine whether or not an SEA is required, a ‘screening’ exercise has been undertaken by the Council. The screening assesses the contents of the CCAP against the criteria set out in the ODPM guidance and SEA Regulations.
- 2.6 Should the screening conclude that the CCAP is applicable and will have a ‘significant impact on the environment’, then a full SEA will be required. Should the conclusion be that an SEA is not required, then any future significant variations or additions to the CCAP will need to be subject to further screening.

### The Climate Change Action Plan (CCAP)

- 2.7 Runnymede Borough Council (RBC) has prepared a draft Climate Change Action Plan (CCAP) to deliver the objectives of the Council’s Climate Change Strategy. The CCAP sets out the Council’s commitments and identifies a number of actions that could contribute towards the Council’s targets of net zero operational and wider borough emissions by 2030 and 2050 respectively.
- 2.8 The CCAP represents the Council’s current understanding of the actions that will be required, but the plan is iterative and will evolve as our understanding, resources, policy landscape and available technologies evolve. At a minimum, the CCAP will be reviewed in full in line with Corporate Business Plan updates and to allow for project completion and development. The CCAP effectively sits as a subset of this higher level strategy, as well as the Climate Change Strategy.
- 2.9 The CCAP identifies actions and broad directions of travel as well as guiding principles, but does not set policy or requirements itself. It will be a corporately adopted document, designed to influence and guide corporate work planning, budget setting and decision-making, as well as convene wider community action around the Borough.

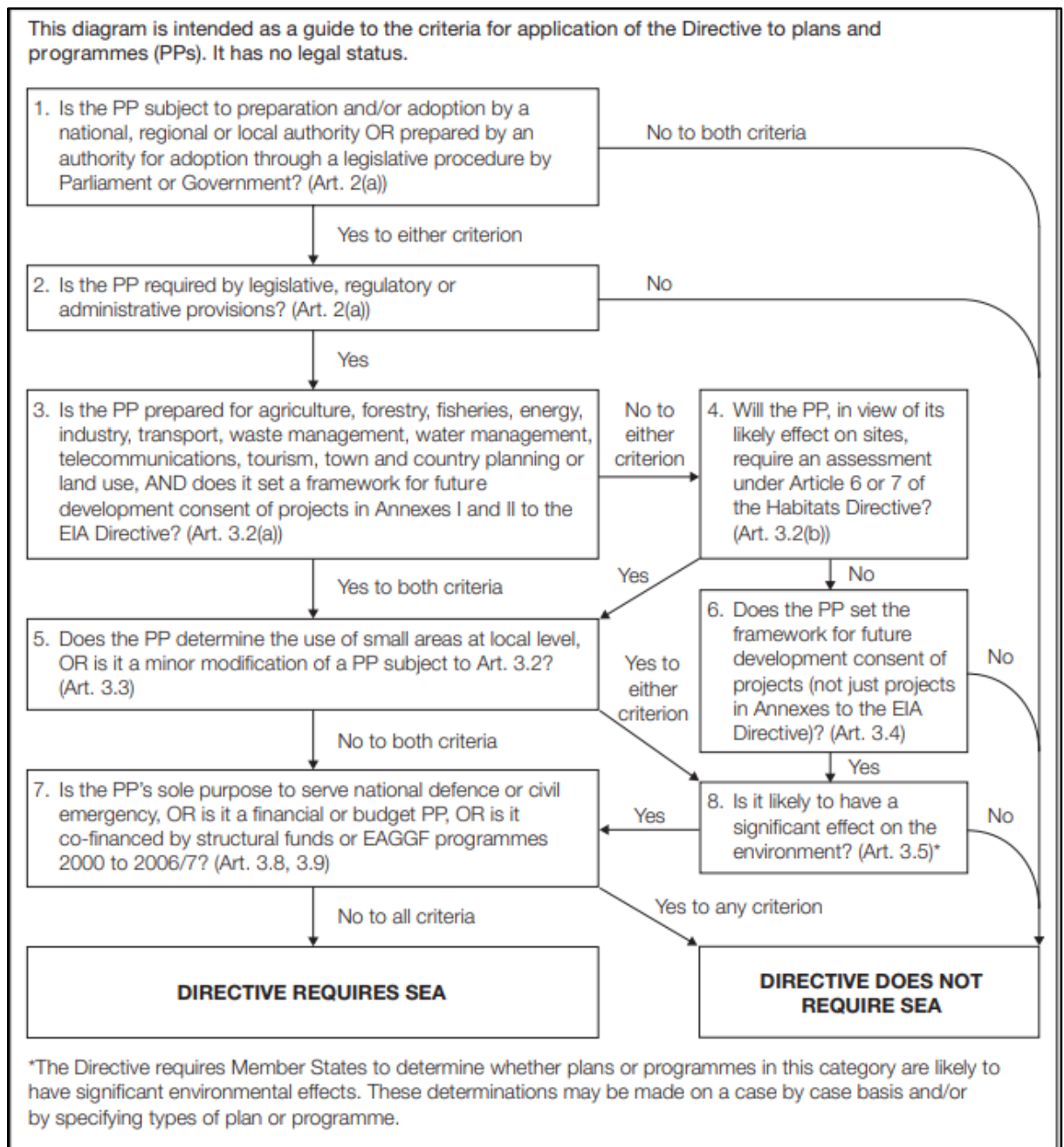


Figure 1: Application of the SEA Directive to plans and programmes. Source: ODMP Guidance (2005)

## SEA Screening Assessment

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

Stage	Y/N	Reasoning
1. Is the PP (plan or programme) subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Art. 2(a))	Y	The CCAP has been prepared and will be adopted by Runnymede Borough Council. <b>Go to stage 2</b>

<p>2. Is the PP required by legislative, regulatory or administrative provisions? (Art.2(a))</p>	<p>N / (Y)</p>	<p>Neither the Climate Change Action Plan, nor the Climate Change Strategy which it supports, are formally required by any legislative, regulatory or administrative provisions.</p> <p>Characteristics of ‘administrative provisions’ are likely to be that they are publicly available (which the CCAP will be); prepared in a formal way, probably involving consultation with interested parties (the CCAP is being prepared in this way); have had sufficient formality such that it counts as a “provision” and it must also use language that plainly requires rather than just encourages a plan or programme to be prepared.</p> <p>The Climate Change Strategy, and the supporting CCAP, have been prepared to achieve the aims of the overarching Corporate Business Plan 2022-2026, which is updated every four years. A key aim of the Business Plan is to achieve the Council’s target to reach net zero emissions by 2030, in line with a formal Council Resolution of January 2022. Whilst members discussed how a Climate Change Strategy and Action Plan would be needed to help achieve this target, there has been no formal resolution to produce such a Strategy. The language is more a statement of commitment rather than a formal decision that a Strategy and Plan would be prepared. The Climate Change Strategy was approved by Full Council on 20 October 2022 alongside the overarching Corporate Business Plan.</p>
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Table 1: SEA Screening Step 1

- 2.11 As a result of the above, the conclusion of the SEA screening is that the SEA Directive does not require the draft CCAP to be subject to full SEA.
- 2.12 However, taking a more critical view of criterion 2 based on a precautionary interpretation of the term “administrative provisions” further criteria have been considered to show the outcome of the assessment should the answer to criterion 2 be considered by some to be ‘yes’.

Stage	Y/N	Reasoning
<p>3. Is the PP prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive? (Art 3.2(a))</p>	<p>N</p>	<p>The CCAP includes actions relating to agriculture, forestry, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning and land use, including potentially in relation to some of the projects referred to in Annex I and II of the EIA Directive. However, the Plan does not set a formal framework for</p>



		the determination of future development consent for such projects. <b>Go to stage 4</b>
4. Will the PP, in view of its likely effect on sites, require an assessment for future development under Article 6 or 7 of the Habitats Directive? (Art. 3.2 (b))	N	See HRA Screening below. <b>Go to stage 6</b>
6. Does the PP set the framework for future development consent of projects (not just projects in annexes to the EIA Directive)? (Art 3.4)	N	Once adopted, the CCAP is unlikely to constitute a material planning consideration, and it will not form part of the Development Plan for the area. The CCAP does not contain specific criteria or conditions against which the Council as Local Planning Authority would decide an application for planning permission. In addition, although the CCAP refers to a Local Plan revision and may influence the pace of that process, any revised Local Plan will be subject to SA/SEA as a matter of course in the development of that Plan. <b>Directive does not require SEA</b>
8. Is it likely to have a significant effect on the environment? (Art. 3.5)	N	The CCAP is unlikely to have any significant effect on the environment – see Table 2 for the detailed assessment which supports this conclusion. <b>Directive does not require SEA</b>

2.13 Although the answer to criterion 6 is ‘No’, which would suggest that the SEA Directive does not require the CCAP to be subject to full SEA, as a precautionary approach an assessment has been presented in Table 2 below of whether the CCAP would likely have a significant environmental effect or not. The assessment has been made using criteria set out in Schedule 1 of the SEA Regulations.

2.14 The screening requirements set out in Regulation 9 and Schedule 1 of the SEA Regulations include two sets of characteristics for determining the likely significance of effects of the environment:

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

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

Criteria for determining the likely significance of effects (Schedule 1 SEA Regulations)	Likely to have significant environmental effect? (Yes/No)	Justification for Screening Assessment
<b>• The characteristics of plans, having regard, in particular, to:</b>		
(a) the degree to which the plan sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources	No	The CCAP identifies a number of commitments that the Council is making in the short, medium and long-term associated with the mitigation of and adaptation to climate change. To this extent, the CCAP sets a framework for projects and activities. However, this is only at a high level in relation to location, nature, size and operating conditions. Further to this, the framework for the CCAP and the actions within it have been set by the Council’s Corporate Business Plan and are rooted in the strategic goals of the

		Climate Change Strategy. The actions of the CCAP have been identified partly through consideration of potential staffing resources, however the CCAP itself does not allocate staffing or financial resources in itself. Decisions relating to resource allocation and definitive decisions to proceed with specific projects will be subject to business case development and approval.
(b) The degree to which the plan or programme influences other plans and programmes, including those in a hierarchy	No	The CCAP identifies the Council's role in relation to a large number of potential actions as delivering, enabling, supporting or lobbying. A number of the actions cross reference to other plans, including identifying actions to develop new planning policy in relation to specific issues through the revised Local Plan. In this way, the CCAP will influence the production of other plans and programmes, as well as the Council's corporate processes. However, it is considered that the degree of influence of this CCAP is limited, particularly as this CCAP itself is directly and significantly influenced by the Council's Corporate Business Plan and the Council's Climate Change Strategy.
(c) The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development	No	The CCAP is specifically aimed at identifying the ways in which the Council will deliver, enable, support and lobby to take action on climate change. Environmental considerations and the contribution to the achievement of sustainable development are integral to the CCAP, for example by advocating the development of an Electric Vehicle Strategy or Decarbonisation Plan for the Council estate. However, the integration of these aspects into corporate priorities has already been achieved via the Council's Corporate Business Plan, Climate Change Strategy, and the Housing Asset Management Plan, and therefore this CCAP is merely identifying and reinforcing priorities that are already in place.
(d) Environmental problems relevant to the plan or programme	No	The CCAP sets out the Council's contribution towards action to mitigate and adapt to climate change. In many cases, the Council will not be the only, or even the main contributor to action/project delivery. Therefore, it is difficult to quantify the Council's or this CCAP's contribution as a part of this. The CCAP is designed to encourage positive action cumulatively along with other local, regional, national and international plans, resulting in positive impacts and effects upon the environment. Whilst the impacts of local action should not be underestimated, the CCAP in isolation is unlikely to result in significant impacts on mitigating or adapting to climate change, either generally or in the context of the UK.
(e) The relevance of the plan for the implementation of [European] Community legislation on the environment (for example, plans and programmes linked to waste	No	The potential actions identified by the CCAP are primarily designed to work towards mitigation of and adaptation to climate change. That being said, there will be clear linkages to issues such as water quality, air quality, waste management, nitrate pollution and habitat protection; all of which are covered by various pieces of Community legislation. The specific linkages, impacts and relevance are not known at



management or water protection)		this stage beyond a high level assumption that there may be co-benefits of action in many cases. The CCAP makes it clear that actions should not be narrowly defined by simply a need to reduce emissions, sequester carbon or reduce flood risk for instance, but should look to build on these potential co-benefits. Therefore, there is likely to be scope for positive relevance of the CCAP to the implementation of other Community legislation and the environment.
<p><b>• Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:</b></p>		
(a) The probability, duration, frequency and reversibility of the effects	No	The CCAP identifies a large number of potential actions that are considered to likely be necessary for the Council and the borough to work towards net zero carbon emissions. However, the CCAP on its own does not provide any measures of ensuring that these actions and measures will be implemented, and there is little within the CCAP as to the details of individual projects that can enable an assessment of specifics. Generally, however, the CCAP is intended to (alongside other plans, programmes and projects locally, regionally, nationally and internationally) encourage major, permanent shifts in behaviours, processes and developments, ultimately leading to the delivery of positive outcomes for the environment. Some actions may be one-off, others may influence on-going approaches and processes.
(b) The cumulative nature of the effects	No	The CCAP will in combination with other plans of this nature locally, regionally, nationally and internationally, have a positive effect on the environment when considered together. However, in isolation, its effects will be limited.
(c) The transboundary nature of the effects	No	No significant transboundary effects with other EU countries are likely from the proposed actions.
(d) The risks to human health or the environment (for example, due to accidents)	No	The CCAP seeks to address climate change which in itself poses a significant risk to human health and the environment both locally and globally. Beyond this general aspiration, it is not envisaged that this CCAP will, on its own, have a positive impact upon more specific risks to human health, although it will contribute to addressing such in combination with other plans and programmes. As an example, it is hoped that it will contribute to the UK's legally binding duty to decarbonise by 2050. There are a large number of potential actions that are identified as having potential to deliver co-benefits in relation to health and wellbeing (for instance actions around active travel which may result in reduced air quality concerns and improved physical and mental health for individuals). However, the specifics of projects and specific impacts/effects that they will have is not clear at this stage. In the meantime, concerns exist about the environmental impacts associated with the mining, production and disposal of batteries for use in electric cars and energy storage, however, the CCAP has no tangible influence on that process and the CCAP is acting on the recommendations of the Committee on Climate Change and direction that Government policy suggests is necessary.

(e) The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)	No	The CCAP covers the full extent of Runnymede Borough. Some actions may be relevant to specific areas and populations within the Borough, and some actions may be part of wider actions/projects that extend beyond the Borough (for instance Surrey-wide). However, the effects of the CCAP are likely to be restricted almost entirely to the Borough area. Generally, the effects of the Plan are anticipated to be positive.
(f) The value and vulnerability of the area likely to be affected due to – i) special natural characteristics or cultural heritage; ii) exceeded environmental quality standards or limit values; or iii) intensive land-use	No	<p>Runnymede has a number of special natural characteristics which make it vulnerable to climate change. The CCAP identifies these vulnerabilities at a high level, particularly focusing on risks associated with river/groundwater flooding and higher temperatures. The CCAP identifies a number of potential actions which begin to address these vulnerabilities – generally through the development of other plans and strategies such as a revised Local Plan and the River Thames Scheme - and as such should contribute towards positive effects on these areas of the Borough, which would otherwise be adversely impacted by climate change.</p> <p>However, on the basis of the information available to the Council, there is no evidence at present of special levels of vulnerability within the Borough, any significant exceeding of standards or limits values, or any evidence of unduly intensive land use.</p> <p>The Borough has a relatively high concentration of designated natural habitats and historical assets including Listed Buildings and Conservation Areas. There is little within the CCAP as to the details of individual projects that can enable an assessment of specific effects and impacts upon these assets to be established at this stage. As actions are developed into more detailed projects and proposals they will need to be carefully considered to ensure that detrimental impacts are avoided and minimised. The revised Local Plan, for example, will recognise the risks posed by climate change to the natural and historic environment, as well as the need to consider heritage impacts in a number of places within it. It will also recognise the positive contribution that the historic environment can make, particularly with regards to re-use and retrofit of existing buildings in terms of embodied carbon and compatibility with conservation objectives. The revised Local Plan will itself be subject to SA/SEA in the course of its development.</p>
(g) The effects on areas of landscapes which have a recognised national, Community or international protection status.	No	The CCAP identifies a large number of potential actions, but their high level nature makes it impossible to establish whether or not there could be significant effects upon the area's protected sites and landscapes. As actions are developed into more detailed projects and proposals they will need to be carefully considered to ensure that detrimental impacts are avoided and minimised.

Table 2: SEA Screening Step 2

## SEA Screening Conclusion

- 2.15 Runnymede Borough Council, as the 'responsible authority', considers that SEA is not mandatory for the draft Climate Change Action Plan (CCAP) since it:
- is not required by legislative, regulatory or administrative provisions;
  - does not set the framework for future development consent for projects listed in Annexes I and II to the Environmental Impact Assessment (EIA) Directive (85/33/EEC) (or for projects listed in Schedule 1 or 2 of the EIA Regulations); nor,
  - has it been determined to require an HRA appropriate assessment (see chapter 3 below).
- 2.16 Nonetheless, the Council has carried out a screening assessment to determine whether or not the draft CCAP is likely to have significant environmental effects. Regulation 9 of the SEA regulations states that before making a determination, the responsible authority shall:
- (a) take into account the criteria specified in Schedule 1 to the SEA Regulations, and
  - (b) consult the consultation bodies.
- 2.17 The criteria in Schedule 1 are reflected in Table 2 above. The consultation bodies – Natural England, the Environment Agency and Historic England – have also been consulted. Responses were received from two of the bodies agreeing with the findings of the screening report. Their responses are included in Appendix 2.
- 2.18 Runnymede Borough Council determines that the draft Climate Change Action Plan (CCAP) is unlikely to have significant environmental effects for the reasons set out in Table 2, and thus does not require a Strategic Environmental Assessment (SEA). However, it is important that relevant individual projects are subject to project-level Environmental Assessment as their detail is developed to understand if significant effects may arise.

## 3. Habitats Regulations Assessment (HRA) Screening

- 3.1 This section of the report has been prepared to determine whether an appropriate assessment of the CCAP is required to secure compliance with European Habitats Directive 92/43/EEC (Habitats Directive) as transposed into English law by the Conservation of Habitats and Species Regulations 2017 (Habitat Regulations), which aim to protect and improve Europe's most important habitats and species.
- 3.2 Habitats Regulations Assessment (HRA) is a systematic process through which plans or projects are assessed for likely impact on the integrity of European Sites. Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) were collectively, previously known as Natura 2000 sites, but are now known as the National Site Network upon the UK exiting the EU.
- 3.3 There are four European/National Network sites within and in close proximity to Runnymede:
- Special Protection Areas (SPA) designated under the Wild Birds Directive
    - the Thames Basin Heaths SPA;
    - the South West London Waterbodies SPA (also includes South West London Waterbodies Ramsar – one unit (Thorpe Park Gravel Pit No.1);
  - Special Areas of Conservation (SAC) designated under the Habitats Directive
    - the Windsor Forest and Great Park SAC; and
    - the Thursley, Ash, Pirbright and Chobham SAC.

- 3.4 Article 6(3) of the Habitats Directive states that *“Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans and projects, shall be subject to appropriate assessment of its implications for the site in view of the site’s conservation objectives”*.
- 3.5 Under the Habitat Regulations, the Council is considered to be a ‘competent authority’. Regulation 63(1) of the Habitat Regulations states that:  
*“A competent authority, before deciding to undertake, or give any consent, permission or other authorisation for, a plan or project which –*  
*a) 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*  
*b) is not directly connected with or necessary to the management of that site.*  
*must make an appropriate assessment of the implications of the plan or project for that site in view of that site’s conservation objectives”*.
- 3.6 There are several distinct stages of assessment which must be undertaken in accordance with the Habitat Regulations to determine if a plan or project may affect the protected features of a habitats site before deciding whether to undertake, permit or authorise it. The four stages include:
- Step 1:** Screening – identification of likely impacts on a National Network site either alone or in combination with other plans/projects and consideration of whether these are significant.
- Step 2:** Appropriate Assessment – consideration of the impact on the integrity of the National Network site whether alone or in combination with other plans or projects with respect to the sites structure, function and conservation objectives. Where there are significant effects, step 2 should consider potential mitigation measures.
- Step 3:** Assessment of Alternative Solutions – assessing alternative ways of achieving the objectives of the plan/project which avoid impacts; and
- Step 4:** Assessment of Compensatory Measures – identification of compensatory measures should impact not be avoided and no alternative solutions exist and an assessment of imperative reasons of overriding public interest (IROPI) deems that a project should proceed.
- 3.7 Should step 1 reveal that significant effects are likely or an effect cannot be discounted because of uncertainty, then it is necessary to move onto step 2: Appropriate Assessment. If step 2 cannot rule out significant effects even with mitigation, then the process moves onto step 3 and finally step 4 if no alternative solutions arise.
- 3.8 In order to establish whether the CCAP is likely to have any significant effects upon the European/National Network sites, this screening assessment considers the CCAP in relation to four steps based around the screening methodology set out in the methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC (European Commission 2001), as set out in Table 3 below.

Question	Y/N	Reason
1. Is the PP directly connected with, or necessary to the management of a	N	The CCAP is of a high level nature and does not directly influence or set policy necessary to the management of any European site.

European site for nature conservation?		
2. Are there any other PPs that could in combination with this PP have potential to have significant effects upon a European Site?	Y	<p>The CCAP identifies the Council's role in relation to a large number of potential actions as deliver, enable, support or lobby. A number of the actions cross reference to other plans, including identifying actions to develop new planning policy in relation to specific issues through the revised Local Plan. The CCAP will influence the production of other plans and programmes, as well as the Council's corporate processes. However, the CCAP is directly influenced by the Council's Corporate Business Plan and Climate Change Strategy. The CCAP sets out the Council's contribution towards action to mitigate and adapt to climate change. In many cases, the Council will not be the only, or even the main contributor to action/project delivery. Therefore, it is difficult to identify the specific significance of the Council's or this CCAP's contribution as a part of this. The CCAP identifies where biodiversity related co-benefits are envisaged and is designed to result in positive action and, cumulatively, along with other local, regional, national and international plans, result in positive impacts and effects upon the environment.</p> <p>The revised Local Plan (which will be a means to implement a number of the actions identified within the CCAP) may have potential to have significant effects upon a European Site. The Local Plan process will be subject to Appropriate Assessment as a matter of course. The HRA published alongside the existing 2030 Local Plan describes the characteristics and potential issues of relevance for each of the European Sites and assesses the Local Plan policy options for likely effects upon the Sites. This will be updated during the course of developing a revised Local Plan.</p> <p>A key action of the CCAP is to work with partners to develop a Green and Blue Infrastructure Strategy, which in turn will support the development of Surrey's Local Nature Recovery Strategy and influence a number of other actions identified within the CCAP. The GBI Strategy (which itself will be subject to HRA screening) will be specifically designed to result in positive effects upon plants, wildlife and habitats locally, including within the European sites.</p>
3. Are there likely to be any potential effects upon the identified European sites?	Y	<p>The CCAP is designed to result in positive environmental impacts. This includes in relation to the management of land, recovery of nature, greater emphasis on our natural capital and realising ecosystem services amongst other things. Specific details and projects are not yet known, but they could conceivably include projects aimed at protecting and enhancing European Sites. Several of the European Sites in question have species of birds as qualifying features (see Appendix 1). Targeted multi-benefit tree planting and hedgerow creation projects have the potential to directly enhance foraging and migrating landscapes for birds. Simply focusing on planting trees of any species to hit target numbers and sequestration/offsetting volumes could have negative effects upon European Sites if non-native and/or inappropriate species were used on or in close proximity to them. The Council's GBI Strategy and wider Local Nature Recovery Strategy will need to recognise these issues and build in mitigation into their own</p>

		relevant actions, so that a more holistic approach is taken building on potential co-benefits. Increased levels of green and blue infrastructure (potentially including official Suitable Alternative Natural Green Spaces (SANGs)) in close proximity to populations and enhanced biodiversity offsetting as part of new developments have the potential to divert visitors away from European Sites. New renewable installations, particularly any large-scale solar installations (the potential for wind power has been assessed as 'low' in the Borough) will need to be carefully planned to avoid and reduce detrimental effects upon biodiversity particularly those qualifying features of the European Sites. All of the above is not possible to assess at this high level stage, and will need to be assessed as more detail becomes clearer such as part of the HRA for the revised Local Plan and/or at the project level.
4. What is the significance of the effects upon the identified European Sites?	N/A	The CCAP is designed to result in positive environmental impacts. Overall positive impacts associated with potential actions around tree planting, hedgerow creation and green and blue infrastructure provision for instance has the potential to have significant positive effects upon the European Sites and qualifying features, but it is impossible to tell exactly how significant these effects might be at this stage as project detail (including location and relationship with European Sites) is not yet known. Potential negative effects of for instance renewable energy schemes could be significant if for instance new wind turbines/ground-mounted solar schemes were located in bird migration paths or within European Sites. However, two potential actions in the CCAP involve strengthening support for renewable energy and energy storage in the revised Local Plan, and to develop an Energy Strategy for the Council's operational estate. These actions will require their own evidence accounting for biodiversity impact and effects upon European Sites. The HRA for the Local Plan will assess any proposals within it.

## HRA Screening Conclusion

- 3.9 The Council determines that the CCAP will not give rise to significant effects on the National Network sites either alone or in combination with other plans and/or projects. Given the findings of the screening assessment, it is considered that the CCAP does not require a full Appropriate Assessment under HRA legislation. However, it is important that relevant individual projects are screened as their detail is developed to understand if significant effects may arise.
- 3.10 These screening assessment outcomes have been subject to consultation with the statutory environmental bodies (Environment Agency, Historic England, Natural England) for the formal 5 weeks period to demonstrate that due processes have been undertaken to screen the draft Climate Change Action Plan with regard to HRA and SEA.



## APPENDIX 1: EUROPEAN SITE CONSERVATION OBJECTIVES<sup>1</sup>

South West London Waterbodies SPA											
<p><b>Conservation objectives:</b> Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring:</p> <ul style="list-style-type: none"> <li>• The extent and distribution of the habitats of the qualifying features;</li> <li>• The structure and function of the habitats of the qualifying features;</li> <li>• The supporting processes on which the habitats of the qualifying features rely;</li> <li>• The population of each of the qualifying features; and</li> <li>• The distribution of the qualifying features within the site.</li> </ul> <p><b>Qualifying features:</b></p> <ul style="list-style-type: none"> <li>• A051: <i>Anas strepera</i>; Gadwall (Non-breeding); and</li> <li>• A056: <i>Anas clypeata</i>; Northern shoveler (Non-breeding).</li> </ul>											
South West London Waterbodies Ramsar											
<p>Ramsar sites do not have the Conservation Objectives in the same way as SPAs and SACs. Information regarding the designation of Ramsar sites is contained in INCC Ramsar Information Sheets. Ramsar Criteria are the criteria for identifying Wetlands of International Importance. The relevant criteria and ways in which this site meets the criteria are presented in the table below.</p>											
Ramsar Criterion	Justification for the application of each criterion										
6	<p>Ramsar criterion 6 – species/populations occurring at levels of international importance.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th colspan="2" style="background-color: #f4a460;">Qualifying species/populations (as identified at designation):</th> </tr> <tr> <th colspan="2" style="background-color: #f4a460;">Species with peak counts in spring/autumn</th> </tr> </thead> <tbody> <tr> <td style="width: 50%;">Northern shoveler, <i>Anas clypeata</i>, Northwest and Central Europe</td> <td style="width: 50%;">397 individuals, representing an average of 2.6% of the GB population (5 year peak mean 1998/9- 2002/3)</td> </tr> <tr> <th colspan="2" style="background-color: #f4a460;">Species with peak counts in winter:</th> </tr> <tr> <td>Gadwall, <i>Anas strepera strepera</i>, Northwest Europe</td> <td>487 individuals, representing an average of 2.8% of the GB population (5 year peak mean 1998/9- 2002/3)</td> </tr> </tbody> </table>	Qualifying species/populations (as identified at designation):		Species with peak counts in spring/autumn		Northern shoveler, <i>Anas clypeata</i> , Northwest and Central Europe	397 individuals, representing an average of 2.6% of the GB population (5 year peak mean 1998/9- 2002/3)	Species with peak counts in winter:		Gadwall, <i>Anas strepera strepera</i> , Northwest Europe	487 individuals, representing an average of 2.8% of the GB population (5 year peak mean 1998/9- 2002/3)
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Thames Basin Heaths SPA											
<p><b>Conservation objectives:</b> Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring:</p> <ul style="list-style-type: none"> <li>• The extent and distribution of the habitats of the qualifying features;</li> <li>• The structure and function of the habitats of the qualifying features;</li> <li>• The supporting processes on which the habitats of the qualifying features rely;</li> <li>• The population of each of the qualifying features; and</li> <li>• The distribution of the qualifying features within the site.</li> </ul> <p><b>Qualifying features:</b></p> <ul style="list-style-type: none"> <li>• A224: <i>Caprimulgus europaeus</i>; European nightjar (Breeding);</li> <li>• A246: <i>Lullula arborea</i>; Woodlark (Breeding); and</li> <li>• A302: <i>Sylvia undata</i>; Dartford warbler (Breeding).</li> </ul>											
Thursley, Ash, Pirbright and Chobham SAC											
<p><b>Conservation objectives:</b> Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying features, by maintaining or restoring:</p> <ul style="list-style-type: none"> <li>• The extent and distribution of qualifying natural habitats;</li> <li>• The structure and function (including typical species) of qualifying natural habitats; and</li> <li>• The supporting processes on which qualifying natural habitats rely.</li> </ul>											

<sup>1</sup> This information is drawn from the [Joint Nature Conservancy Council \(JNCC\)](#) and [Natural England](#).

**Qualifying Features:**

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

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

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

- The extent and distribution of qualifying natural habitats and habitats of qualifying species;
- The structure and function (including typical species) of qualifying natural habitats; The structure and function of the habitats of qualifying species;
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely;
- The populations of qualifying species; and
- The distribution of qualifying species within the site.

**Qualifying Features:**

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

## APPENDIX 2: RESPONSES FROM STATUTORY CONSULTEES

**CAUTION: This email originated from an external sender. Do not click links or open attachments unless you recognise the sender and know the content is safe.**

Dear Stephanie,

Thank you for your email. This has been logged under a Natural England reference of 455031.

Natural England agree with the conclusions of the screening report that a SEA/HRA are not required for the Climate Change Action Plan.

Kind Regards,  
Paige

Paige Eke-Goodwin (She/Her)  
Sustainable Development Lead Advisor  
Natural England

[www.naturalengland.org.uk](http://www.naturalengland.org.uk)

<https://twitter.com/NEThamesSolent>

<https://www.facebook.com/NEThamesSolent/>



Historic England

Planning Policy  
Runnymede Borough Council  
Station Road  
Addlestone KT15 2AH

By email only to [PlanningPolicy@runnymede.gov.uk](mailto:PlanningPolicy@runnymede.gov.uk)

Our ref: PL00794380

Your ref:

Telephone 020 7973 3700

Email [e-seast@historicengland.org.uk](mailto:e-seast@historicengland.org.uk)

Date 27 November 2023

Dear Sir or Madam

Runnymede Borough Council Draft Climate Change Action Plan Strategic Environmental Appraisal Screening Opinion

Thank you for your email dated 24 October 2023 consulting Historic England on your intention of carrying out a SEA for the above plan.

In light of the Environmental Assessment of Plans and Programmes Regulations 2004, our view is that a SEA is not required in this instance for the reason set out in paragraph 2.17 of the Screening Statement (Runnymede Borough Council, October 2023).

*Yours sincerely*

*Alan Byrne*  
Historic Environment Planning Adviser

**For all information contained within this document contact:**

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Runnymede Borough Council  
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