

# **Pyrford Neighbourhood Plan**

## **Strategic Environmental Assessment, Habitat Regulations Assessment & Environmental Impact Assessment**

### **Screening Report**

**11 January 2016**

# Contents

<b>Introduction</b>	<b>3</b>
<b>Section 1: SEA Screening</b>	<b>3</b>
<b>Section 2: HRA Screening</b>	<b>10</b>
<b>Section 3: EIA Screening</b>	<b>16</b>
<b>Section 4: Determinations and Statement of Reasons</b>	<b>16</b>
<b>Appendix A: Consultation Responses</b>	<b>18</b>
<b>Appendix B: European Sites within Woking</b>	<b>20</b>
<b>Appendix C: Objectives and Indicators</b>	<b>21</b>

# Screening Report for Draft Pyrford Neighbourhood Plan

## Introduction

On 22 December 2015, Pyrford Neighbourhood Forum (hereafter known as 'PNF') wrote to Woking Borough Council to formally request a Screening Opinion for the need to carry out a Strategic Environmental Assessment (SEA), Habitat Regulations Assessment (HRA) and Environmental Impact Assessment (EIA) on their emerging neighbourhood plan. This screening report is designed to determine whether or not the contents of the emerging Pyrford Neighbourhood Plan (hereafter known as 'PNP') requires these series of assessments.

Pyrford Neighbourhood Area was formally designated by Woking Borough Council in February 2014 for the purposes of preparing a Neighbourhood Development Plan by PNF. The drafting of the PNP was prepared by a group of local residents who formed a Neighbourhood Plan Committee and divided themselves into topic based workgroups. PNF prepared and consulted on their draft plan between 12 May to 22 June 2015. Following the consultation, subsequent changes were made to PNP. The Screening Opinion is based on the most up to date version of the PNP submitted in December 2015.

This report is split into four sections. Section 1 provides a screening assessment of both the likely significant environmental effects of the PNP and the need for a full SEA. Section 2 provides a screening assessment of both the likely significant effects of the implementation of the PNP and the need for HRA. Section 3 assesses the need for an EIA. Section 4 sets out the Council's final determinations, and a statement of its reasons for the determinations.

In forming its determinations, the Council consulted the three statutory consultation bodies designated in the Regulations (Historic England, Environment Agency and Natural England) on whether environmental assessment is required. Comments made by the consultation bodies are set out in Appendix A.

## **Section 1: SEA Screening**

A neighbourhood plan must be compatible with European Union obligations, as incorporated into UK law, in order to be legally compliant. The first to be considered is Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (known as the 'SEA Directive') and transposed into UK law by the Environmental Assessment of Plans and Programmes Regulations 2004 (referred to as the 'SEA Regulations').

In some limited circumstances, where a neighbourhood plan could have significant environmental effects, it may fall within the scope of the SEA Regulations and the SEA Directive. National Planning Practice Guidance<sup>1</sup> sets out how an SEA may be required, for example, where:

- **a neighbourhood plan allocates sites for development** – the draft PNP does not allocate sites for development;
- **the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan** – the Pyrford Neighbourhood Area does feature sensitive natural and heritage assets including Pyrford Common Site of Nature Conservation Importance, areas of Ancient Woodlands, areas of High Archaeological Potential, Conservation Areas and listed buildings;
- **the neighbourhood plan may have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan (Woking Core Strategy)** – this is assessed in more detail below.

It is for the Council to determine whether an SEA is required, through a screening process. To decide whether a draft neighbourhood plan might have significant effects, SEA Regulations require that its

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<sup>1</sup> National Planning Practice Guidance is available here: <http://planningguidance.planningportal.gov.uk/blog/guidance/> (accessed July 2014)

potential scope should be assessed at an early stage against the criteria set out in Schedule 1 to the SEA Regulations (or Annex II of the SEA Directive), reproduced below:

**SCHEDULE 1  
CRITERIA FOR DETERMINING THE LIKELY SIGNIFICANCE OF  
EFFECTS ON THE ENVIRONMENT**

1. The characteristics of plans and programmes, having regard, in particular, to –
  - 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;
  - b) the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;
  - c) the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;
  - d) environmental problems relevant to the plan or programme; and
  - e) the relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste management or water protection).
  
2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to –
  - a) the probability, duration, frequency and reversibility of the effects;
  - b) the cumulative nature of the effects;
  - c) the transboundary nature of the effects;
  - d) the risks to human health or the environment (e.g. due to accidents);
  - e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);
  - 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; and
  - g) the effects on areas or landscapes which have a recognised national, Community or international protection status.

Source: The Environmental Assessment of Plans and Programmes Regulations 2004, accessed at: [http://www.legislation.gov.uk/ukxi/2004/1633/pdfs/ukxi\\_20041633\\_en.pdf](http://www.legislation.gov.uk/ukxi/2004/1633/pdfs/ukxi_20041633_en.pdf), which replicate the criteria in Annex II of the SEA Directive 2001/42/EC.

It is required by the Localism Act that neighbourhood plans must be in general conformity with the strategic policies of the Local Plan. Woking Borough Council has a Core Strategy which was adopted in October 2012. Therefore the PNP must be in general conformity with this document. The Core Strategy was subject to a full Sustainability Appraisal which included a SEA assessment<sup>2</sup>. This ensured that there were no likely significant effects which would be produced from the implementation of the Core Strategy and if so ensured mitigation measures were in place. Assuming, the draft PNP is in general conformity with the Core Strategy and there are no significant changes introduced by the final PNP, it can be concluded that the implementation of the PNP would not result in any likely significant effects upon the environment. A more detailed assessment has been carried out below.

## **SEA Screening Assessment**

Practical guidance to the SEA Directive, published by the Department of Environment in 2005 but still relevant, provides a useful diagram of the criteria for application of the Directive to plans and programmes (PPs), shown in Figure 1.

<sup>2</sup> The Woking Core Strategy Sustainability Appraisal (July 2011) is available here: <http://www.woking.gov.uk/planning/policy/ldf/cores/woking2027/saofcorestrpd>



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)) <sup>3</sup>	to no. 5)	planning and land use and does set out a framework for future development in the Pyrford Neighbourhood area, including Infrastructure development which may fall under no.10 of Annex II <sup>4</sup> of the EIA directive (for example, for potential social/community infrastructure, which may fall under 'urban development project').
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 (go to no. 6)	See screening assessment for HRA in following section of this report.
5. Does the PP determine the use of small areas at local level, OR is it a minor modification of a PP subject to Art. 3.2? (Art.3.3)	Y (go to no. 8)	The PNP does not determine the use of an area of land; but for the purposes of the SEA Regulations, the plan does effectively make minor modifications to Woking's Local Plan by building on the planning policies contained within Woking Core Strategy.
6. Does the PP set the framework for future development consent of projects (not just projects in annexes to the EIA Directive)? (Art 3.4)	Y (go to no. 8)	The PNP sets policies which planning applications within the PNP area must take account of.
7. Is the PP's sole purpose to serve the national defence or civil emergency, OR is it a financial or budget PP, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7? (Art 3.8, 3.9)	N	None of these apply.
8. Is it likely to have a significant effect on the environment? (Art. 3.5)	N	The PNP is unlikely to have any significant effect on the environment – see Table 2 for the detailed assessment.

## Likely Significant Effects

The table above explains why SEA is not required, supported by the following table which assesses the answer to question 8 of the flowchart. A range of criteria as depicted in Figure 1 has been considered, which leads to the box in the flowchart stating "Directive Does Not Require SEA". The following table supports this outcome and shows how the Council has systematically reached its conclusion.

To decide whether a draft neighbourhood plan might have significant environmental effects, its potential scope should be assessed against the criteria set out in Schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004. Using the information supplied by PNF at the current stage of preparation, the assessment in Table 2 has been made (on the following page).

<sup>3</sup> The newly amended Environmental Impact Assessment (EIA) Directive (2014/52/EU) entered into force on 15 May 2014. Annex I and Annex II of this Directive has been referred to in this assessment.

<sup>4</sup> Schedule II <http://www.legislation.gov.uk/ukxi/2011/1824/schedule/2/made>

**Table 2: Assessment of likely significant effects against Schedule 1 criteria**

Schedule 1 Criteria	Likely to have significant environmental effects?	Comments
1. The characteristics of plans and programmes, having regard, in particular, to -		
1a) 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;	No	<p>The PNP will set out a spatial vision for the designated Pyrford Neighbourhood Area and provide a framework for proposed development in that area regarding housing design, community facilities, local infrastructure (primarily mitigation of traffic issues and parking) and the protection and enhancement of valued open spaces.</p> <p>PNP does not intend to include any but minor projects (set out in section 10 of the PNP with acknowledgement that these are initiatives rather than proposals/policies that carry any planning weight); or any site allocations in the Plan. The Plan, therefore, has limited framework for future projects. Each development would also need a site specific planning application.</p>
1b) the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;	No	<p>The PNP will sit in a hierarchy of Local Development Documents (LDDs), and must be in conformity with strategic policies in the Woking Core Strategy (and the emerging Working Management DPD and Site Allocation DPD). The policies of the draft PNP do not, however, add significantly to the policies in existing LDDs. In preparing future LDDs, the Council should take account of the PNP, but the degree of influence is such that it would not lead to significant environmental effects.</p>
1c) the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;	No	<p>The draft policy objectives set out in the draft PNP seeks to maintain and enhance the special character of the area to provide a safe and pleasant sustainable environment.</p> <p>It is considered that the PNP will have a <b>positive</b> impact on local environment assets and places valued by local people in the PNP area. This will be achieved primarily through the policies for the protection and enhancement of the Village Character, open spaces, wildlife habitats and landscape features. Development is required to respect the character of the surrounding area and retain green infrastructure. The draft PNP seeks to prevent development that would be harmful to important natural landscapes, features and wildlife.</p> <p>In addition, the draft PNP supports development that seeks to mitigate environmental issues relating to traffic.</p> <p>The positive environmental effects expected to result from the PNP are not considered to be 'significant' as per Article 3.5 of the SEA Directive, and a 'No' response is therefore included in column 2.</p>
1d) environmental problems relevant to the plan or	No	<p>As described above, the draft PNP seeks to minimise existing environmental problems in the</p>

programme;		area such as traffic congestion, parking and poorly maintained footpaths, by supporting development proposals which improve local infrastructure. The Plan does not allocate sites or propose development that would give rise to environmental problems. There are no other existing identified environmental problems in the area, such as Air Quality Management Areas.
1e) the relevance of the plan or programme for the implementation of Community legislation on the environment (for example, plans and programmes linked to waste management or water protection);	No	<p>The draft PNP will have little relevance to the implementation of Community legislation – it does not allocate potentially polluting development.</p> <p>The only relevant reference to waste management comes from draft policy BE3 which requires adequate storage facilities for waste bins for all new development proposals.</p> <p>The overarching Woking Core Strategy takes account of the relevant legislative framework for environmental protection. Surrey County Council is the relevant authority for waste and minerals.</p>
<b>2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to -</b>		
2a) the probability, duration, frequency and reversibility of the effects;	No	<p>It is highly unlikely that there will be any irreversible damaging environmental impacts associated with the PNP. The policies in the PNP seek to ensure that any new development preserves and enhances various aspects of the local environment.</p> <ul style="list-style-type: none"> <li>• The Built Environment policies would ensure that new development retains and enhances the character of the area and avoids traffic impacts;</li> <li>• The Village Open Space policies are designed to protect and enhance the landscape character, amenity, public rights of way, wildlife and biodiversity, woodlands and recreational value of open spaces;</li> <li>• Village Social and Community Services policies support development proposals that safeguard community facilities, seek to reduce levels of on-street parking and increase pedestrian safety. Ensure provision made for the aging population.</li> </ul> <p>Essentially there would be no detrimental effects.</p>
2b) the cumulative nature of the effects;	No	The cumulative effect of this plan and Woking's Core Strategy will likely lead to sustainable development in the Borough. It is not considered that the policies cumulatively will result in negative effects; but rather result in modest positive effects. It is considered that all effects will be local in impact.
2c) the transboundary nature of the effects;	No	The likely effects will be local. It is expected that the draft policies would lead to minor positive effects on the local area and surrounding communities, for example, by supporting development that protects and maintains the

		<p>local character and seeks traffic and parking improvements to improve highway safety in the local area.</p> <p>It is not considered that the PNP would have any negative impact on key environmental designations of international, national, regional or local significance within and beyond the boundary of the PNP area beyond that which has already been assessed as part of the Sustainability Appraisal and Habitats Regulation Assessment of the Core Strategy for the Borough (SAs and HRAs have been carried out separately for the emerging Development Management DPD and Site Allocation DPD).</p>
2d) the risks to human health or the environment (e.g. due to accidents);	No	<p>The PNP will pose no risk to human health. Draft policy objectives of the PNP seek to create a safe, pleasant and sustainable environment. Policies seek positive outcomes to the environment and therefore, as a result mostly have a positive impact on human health.</p>
2e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);	No	<p>The PNP relates to a fairly large area (approximately 615 ha). The resident population of Pyrford Neighbourhood Area was 5022 in 2011 (source: 2011 Census). Approximately a third of the geographical makeup of the area is built up with remaining area is open space.</p> <p>It is expected that the PNP policies will have a local impact, focused within and adjoining the urban area (approximately a third of the neighbourhood plan area). Policies aim to protect and enhance existing residential areas, so that any impacts of development on existing local residents will be minimised, subject to detailed design matters being appropriately dealt with through any planning application.</p> <p>The proposed protection of open spaces and landscape features relates to either small local areas or areas already designated and are supported by Core Strategy policies (e.g. Pyrford Escarpment). Policies seek the protection of these areas to ensure a positive impact.</p>
2f) 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>The PNP is unlikely to adversely affect the value and vulnerability of the built, natural or historic environment of the area. On the contrary, it will provide greater support to enhance the setting of heritage, heritage assets and green spaces, including Conservation Areas, nationally and locally listed buildings, Sites of Nature Conservation Importance, Escarpment of Rising Ground of Landscape Importance, and Green Belt.</p> <p>The draft Built Environment policies require development proposals to take into account the impact on listed buildings. In addition to this Core Strategy policy sets out the requirement to protect and enhance heritage assets.</p> <p>Draft policy on open spaces seek to protect and</p>

		enhance open spaces for amenity, community, recreation and wildlife value. The PNP policies also seek to minimise impacts from development to sites of ecological or environmental importance. Parts of Pyrford Neighbourhood Area contain areas designated as SNCI (Site of Nature Conservation Importance). None of the policies are likely to have any negative impacts on this designation.
2g) the effects on areas or landscapes which have a recognised national, Community or international protection status.	No	<p>It is considered that the PNP will not adversely affect areas or landscapes which have a recognised national, community or international protection status. Parts of the PNP area are designated as Green Belt but the proposed policies will be in compliance with Green Belt policy in the Woking Core Strategy and the National Planning Policy Framework.</p> <p>The draft policies of the PNP also seek the protection and enhancement of locally designated landscape features, including the 'Escarpment and Rising Ground of Landscape Importance'; as well as locally designated biodiversity features including the Site of Nature Conservation Importance.</p> <p>Pyrford Neighbourhood Area is within 5km of the SPA, where a small part forms part falls within 400m of the SPA. The draft PNF policies do not allocate sites for development and therefore is unlikely to cause direct adverse effects SPA.</p> <p>The combination of PNP with other DPDs may result in new housing development however the effects would effectively be mitigated by the implementation of the Thames Basin Heath Delivery Framework through the provision of SANG and SAMM- where the Council has identified sufficient SANG to meet future development needs.</p>

## Screening Outcome

Having reviewed the criteria, the Council has concluded that the preliminary draft PNP (December 2015) is not likely to have a significant environmental effect and accordingly will not require a Strategic Environmental Assessment.

## Section 2: HRA Screening

To reiterate, a neighbourhood plan must be compatible with European Union obligations, as incorporated into UK law, in order to be legally compliant. This section of the report has been prepared to determine whether an appropriate assessment of the PNP is required under Directive 92/43/EEC on the conservation of natural habitats and wild fauna and flora (known as the 'Habitats Directive') and Directive 2009/147/EC on the conservation of wild birds (known as the 'Birds Directive'). These aim to protect and improve Europe's most important habitats and species. These Directives are transposed into UK law by The Conservation of Habitats and Species Regulations 2010 (as amended), which require Habitats Regulations Assessments (HRA) to be undertaken for plans and programmes in order to identify any significant effects that the plan might have on Environmental criteria or Habitats in the implementation of the plan.

Article 6 (paragraph 3) of the Habitats Directive provides 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 or projects, shall be subject to an appropriate assessment of its implications for the site in view of the site’s conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public”.*

As set out in Section 1, the PNP is a document that is intended to form part of the Statutory Planning Framework for the Woking Borough, following the process set out in the 2011 Localism Bill and the 2004 Town and Country Planning Act (as amended) and associated Regulations. These state that a Neighbourhood Development Plan must be in ‘general conformity’ with the ‘strategic policies’ of the planning framework, which currently consists of the Woking Core Strategy. The adoption of the Core Strategy document has been subject to both a Strategic Environmental Appraisal and a Habitat Regulations Screening Report, which have been accepted as an appropriate assessment of the plan.

Although the draft PNP does not allocate sites (rather it provides general policies that clarify and provide detail to the policies within the Woking Core Strategy), a high level screening assessment has been undertaken to build upon the HRA Screening Report for the Woking Core Strategy. Therefore, this section of the report should be read in conjunction with the Woking Core Strategy HRA Screening Report<sup>5</sup> (December 2011) and further assesses the degree to which there will be any significant impacts upon European sites.

## European Designated Habitats

European sites (also known as Natura 2000 sites) recognised under the Habitats Directive consist of Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Offshore Marine Sites (OMS). Ramsar sites in England are also protected as European sites, as set out in The Conservation of Habitats and Species Regulations 2010. The vast majority are also classified as SPAs and all terrestrial Ramsar sites in England are also notified as Sites of Special Scientific Interest (SSSIs). From hereon in, all SAC, SPA and Ramsar sites will be referred to as 'European sites'.

The two main European sites within the Borough boundary, and in close proximity to the Borough are:

- **Thames Basin Heaths Special Protection Area (SPA)** – designated for its lowland heathland, supporting significant populations of three specialist ground-nesting birds (Nightjar, Woodlark and Dartford warbler). The regulations covering this designation require that any plan or proposal should have regard to whether it would have a significant effect on these rare birds<sup>6</sup>;
- **Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC)** – designated for its North Atlantic wet heaths and European dry heaths and bog, with extremely important assemblages of rare reptiles, dragonflies, invertebrates and plants.

The Core Strategy HRA Screening Report also screened for potential impacts on European sites located within 20km of Woking Town Centre. Appendix A of the HRA Screening Report sets out maps and citations for all of the designated sites within the 20km study area<sup>7</sup>. A map illustrating these sites is replicated in Appendix B of this screening opinion. At the time of writing, there are no 'candidate SACs' or 'possible SPAs' within this 20km study area. By extending the study area to consider European sites within neighbouring boroughs, the HRA screening covered the potential trans-boundary and cumulative impacts on sites in adjacent boroughs arising from developments in Woking Borough.

<sup>5</sup> The Core Strategy HRA Report can be accessed here: <http://www.woking.gov.uk/planning/policy/ldfresearch/hra>

<sup>6</sup> These birds are listed to be protected in European Directive 2009/147/EC, on the conservation of wild birds, available here: [http://ec.europa.eu/environment/nature/legislation/birdsdirective/index\\_en.htm](http://ec.europa.eu/environment/nature/legislation/birdsdirective/index_en.htm)

<sup>7</sup> The Appendices to the HRA Screening Report can be found here: <http://www.woking.gov.uk/planning/policy/ldfresearch/hra/habreqassapp>

The Thames Basin Heaths SPA and Thursley, Ash, Pirbright and Chobham SAC are illustrated on the Proposals Map accompanying Woking Core Strategy. Neither site falls within the boundary of the Pyrford Neighbourhood Area – the map in Appendix B shows the location of the neighbourhood area in relation to these European sites. However, all land in the Borough is within 5km of a component of the Thames Basin Heaths SPA and a small part of Pyrford is within 400m. New residential development in the Pyrford Neighbourhood Area is therefore considered to have the potential to affect features within them, through, for example, potential additional recreational impacts.

Any development that comes forward in the Pyrford Neighbourhood Area will be subject to policy CS7 of the Core Strategy, on 'Biodiversity and nature conservation', which states that any development with potential impact on the SPA or the SAC will be subject to a Habitats Regulations Assessment to determine the need for Appropriate Assessment. It will also be subject to policy CS8 on 'Thames Basin Heaths Special Protection Areas', which requires any new residential development likely to have a significant effect on the purpose and integrity of the SPA to demonstrate that adequate mitigation measures are put in place to avoid any potential adverse effects. New residential development within Pyrford Neighbourhood Area will also be required to make an appropriate contribution towards the provision of Suitable Alternative Natural Greenspace (SANG) and the Strategic Access Management and Monitoring (SAMM), as per guidance in the Council's Thames Basin Heaths Special Protection Area Avoidance Strategy 2010-2015<sup>8</sup>. As of April 2015 the SANG element of this obligation is included within CIL payments, the SAMM element is paid separately.

## HRA Screening Assessment

This screening assessment is carried out with regard to a series of conservation objectives and ecological indicators to help determine whether proposed PNP issues and policies will be consistent with the protection and enhancement of the conservation features of importance to European sites, and whether any significant effect is likely. These objectives and indicators were identified by the Core Strategy HRA Screening Report. However, in May 2012, Natural England published an updated set of SAC and SPA Conservation Objectives. The UK Post-2010 Biodiversity Framework, delivered via the Government's Biodiversity 2020 Strategy (August 2011)<sup>9</sup>, has also now replaced the UK Biodiversity Action Plan. The list of objectives and indicators from the Core Strategy HRA Screening Report has therefore been updated, and is produced in Appendix C. This includes objectives and indicators for the two main European sites within a reasonable travel distance from the PNP area boundary, which is at a much smaller scale than that of the Borough.

Only if a significant effect is likely is there a need for an appropriate assessment of the plan to be undertaken. The essential question is:

*"is the PNP (or any part of the plan), either alone or in combination with other relevant projects and plans, likely to result in a significant effect upon European sites?"*

The draft PNP policies could potentially have the following effects on European sites:

- recreational pressures, including people pressure, trampling, eutrophication, and pet predation;
- fly tipping, release of non-native species;
- fire-raising;
- hydrology/hydrogeological effects (including water abstraction);
- direct pollution (e.g. proposed Part A and Part B Processes, landfill extensions, construction impacts);
- increasing traffic levels causing airborne nitrogen enrichment of the soil;
- transboundary and cumulative impacts.

Taking the conservation objectives, indicators and potential effects into account, the table below presents a Habitats Regulations Assessment Screening for the Draft PNP:

<sup>8</sup> Woking Borough Council's Thames Basin Heaths Special Protection Avoidance Strategy 2010-2015 is available here: <http://www.woking.gov.uk/planning/policy/ldf/tbhspa/spastrategy2010>

<sup>9</sup> The Government's Biodiversity 2020 Strategy is available here: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/69446/pb13583-biodiversity-strategy-2020-111111.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69446/pb13583-biodiversity-strategy-2020-111111.pdf)

	<b>PNP Draft Policy / Issue</b>	<b>Detail of policy/issue to be screened</b>	<b>Comment</b>	<b>Significant effect likely?</b>
<b>Village Infrastructure</b>	VI1	PNF require notification from WBC of development proposals over a threshold being put forward within the Neighbourhood Area	This policy itself will not lead to development – it sets criteria for planning procedures	No significant effect
	VI2	PNF require WBC to provide them with papers/files on infrastructure on relevant planning applications	This policy itself will not lead to development – it sets criteria for planning procedures	No significant effect
	VI3	Proposals that will increase traffic movement most demonstrate no harm to highway safety	This policy is intended to preserve and enhance the built environment	No significant effect
<b>Built Environment</b>	BE1	Proposals to meet design criteria set out, including preserving natural features, respecting the context and having regard to heritage assets	This policy is intended to preserve and enhance the built environment	No significant effect
	BE2	Proposals to provide adequate on-plot parking ('adequate' is not stated, assumed this means consistent with existing policy requirements).	This policy is intended to preserve and enhance the built environment and support road safety.	No significant effect
	BE3	Proposals to meet design criteria set out, including the provision of appropriate landscaping and storage facilities (waste bins and cycles)	This policy is intended to preserve and enhance the built environment	No significant effect
<b>Village Open Spaces</b>	OS1	Development proposals to respect the landscape character (as set out in the policy). Requirement to provide a LVIA where proposals are likely to have a significant impact on the Wey and Bourne river valleys and Pyrford Escarpment.	This policy itself will not lead to development – it requires proposals to respect the landscape character and carry out LVIA where appropriate. This policy is intended to preserve and enhance the built and natural environment.	No significant effect
	OS2	Designates a number	The policy seeks to	No significant

	<b>PNP Draft Policy / Issue</b>	<b>Detail of policy/issue to be screened</b>	<b>Comment</b>	<b>Significant effect likely?</b>
		of Local Green Spaces where development will not be permitted	conserve and enhance the natural environment.	effect
	OS3	Proposals should not harm the character of public rights of way	The policy seeks to conserve and enhance the natural environment.	No significant effect
	OS4	Prevents development proposals on SNCIs or proposals that would have an adverse effect on SNCIs. Requires mitigation measures for proposals that harm bird nesting habitats. Promotes green corridors. Seeks to protect BOA along the Wey corridor	The policy seeks to conserve and enhance biodiversity.	No significant effect.
	OS5	Seeks the protection of Ancient Woodlands. Seeks the protection of trees of good arboricultural and amenity value.	The policy seeks to conserve and enhance biodiversity.	No significant effect.
<b>Village Social and Community Services</b>	OS1	The policy safeguards a number of community facilities in Pyrford and supports the provision of additional community facilities provided they meet the criteria set out.	This policy is intended to preserve and enhance the built and natural environment. Additional provision is supported.	No significant effect.
	SCS2	Major development proposals for the area will be required to demonstrate provision of adequate recreational facilities to meet the need.	This policy is intended to enhance the built and natural environment.	No significant effect.
	SCS3	Major development proposals for the area will be required to demonstrate adequate provision is made for older people	This policy is intended to enhance the built and social environment.	No significant effect.
	Projects	This section sets out a number of minor	This section does not set out policy	No significant effect.

	PNP Draft Policy / Issue	Detail of policy/issue to be screened	Comment	Significant effect likely?
		projects and initiatives PNF wish to pursue including <ul style="list-style-type: none"> <li>• footpath improvements</li> <li>• a day care centre</li> <li>• enhanced health facilities</li> <li>• enhanced day care facilities</li> </ul>	expected to lead to development. Proposals will be subject to individual planning applications that will be determined on a case by case basis. This section merely sets out the aspirations of PNF	

### In-Combination Effects

Existing plans and proposals must be considered when assessing new plans or programmes for likely significant effects as they may create 'in combination' effects.

For reference, the relevant plans or programmes which should be considered when reviewing in combination effects are listed below:

- Woking Core Strategy DPD
- Woking Local Plan Saved Policies

The Core Strategy HRA Screening Report identified possible in-combination effects with regards to development in the South-East region. The report concluded that there would be no impacts on European sites as a result of potential hydrological changes, hydrogeology, direct pollution or transport-related nitrogen deposition caused by implementing policies in the Core Strategy. It also concluded that *"there are unlikely to be any significant recreational effects arising from WBC's Core Strategy on European sites in the boroughs around Woking"*. In addition, the report highlighted that sufficient Avoidance Strategies have been put in place by all Borough members of the Thames Basin Heaths Joint Strategy Partnership Board to prevent any impact upon the qualifying features of the European sites due to the proposed increase in urban development.

The emerging Development Management Policies DPD and Site Allocation DPD have been subject to separate HRAs. The draft HRA for the emerging Development Management Policies DPD was screened out as *"having no likelihood of leading to significant adverse effects on European sites either alone or in combination with other plans or projects"*. Although the draft HRA for the emerging Site Allocation DPD has not fully screened out that there will be no *"likelihood of leading to significant adverse effects on European sites"* the proposed DPD is still draft and will have to demonstrate this through identifying appropriate mitigation strategies where such effects are identified (Appropriate Assessment).

As the Draft Pyrford Neighbourhood Plan a) will not allocate sites; b) does not contain policies intended to lead to new development; and c) will be in general conformity with existing plans – including Woking Core Strategy policies - which have been assessed at a higher level; it is concluded that no significant in-combination likely effects will occur due to its implementation.

### Screening Outcome

The screening assessment which has been undertaken concludes that no likely significant effects will occur with regards to the European sites within and around Woking Borough, due to the implementation of the Draft PNP. As such, the PNP does not require a full HRA to be undertaken.

Nevertheless, any residential development that will take place within the neighbourhood area on the back of the Core Strategy, or the PNP, will have to comply with policies CS7 and CS8 of the Core Strategy,

which set out criteria for 'Biodiversity and nature conservation' and 'Thames Basin Heaths Special Protection Areas' respectively.

### **Section 3: EIA Screening**

The process of Environmental Impact Assessment is governed by the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (hereafter known as the EIA Regulations), which apply the EU directive "on the assessment of the effects of certain public and private projects on the environment" (usually referred to as the 'EIA Directive'). It should be noted that a newly amended EIA Directive entered into force on 15 May 2014 to simplify the rules for assessing the potential effects of projects on the environment (Directive 2014/52/EU), but the UK Government has yet to transpose the requirements of these arrangements into new regulation (due 2017).

As stated above, a neighbourhood plan must be compatible with European Union obligations, as incorporated into UK law, in order to be legally compliant. EIA is a procedure to be followed for only certain types of proposed development, to ensure that decisions are made in full knowledge of any likely significant effects on the environment and that the public are given early and effective opportunities to participate in the decision making procedures. The EIA Regulations define "EIA development" as that which is either Schedule 1 development<sup>10</sup>; or Schedule 2 development<sup>11</sup> likely to have significant effects on the environment by virtue of factors such as its nature, size or location. EIA is mainly of relevance to Neighbourhood Development Orders, and to development with significant transboundary effects. PNF are not proposing any of these and therefore in this respect an EIA is not required. The draft PNP also includes only minor projects to be supported by development proposals which are not of a type listed in Schedule 1 or Schedule 2 of the EIA Regulations (as well as the updated Schedules in the latest EIA Directive).

A Local Planning Authority is generally called upon to provide an EIA screening opinion in order to gain its opinion as to whether development is EIA development. As PNF does not intend to establish an NDO, and the PNP policies will not lead to development with significant transboundary effects, it is concluded that an EIA screening opinion is not applicable in this instance.

### **Section 4: Determinations, and Statement of Reasons for Determinations**

It should be noted that the following determinations are made in respect of the Draft Pyrford Neighbourhood Plan (December 2015). Should the final draft alter substantially from the preliminary draft, the Council may need to conduct a fresh screening exercise, which may lead to different determinations.

#### **SEA**

A screening assessment to determine the need for a SEA in line with the Regulations and guidance was undertaken and can be found in Section 1 of this report. The assessment finds no negative significant effects will occur as a result of the draft PNP. The assessment also expects that all the PNP policies will be in conformity with the local plan policies which have a full SA/SEA which identified no significant effects will occur as a result of the implementation of policies. Where conflicts occur, appropriate mitigation measures have been incorporated into the local plan policies.

Each of the three statutory consultation bodies with environmental responsibilities have been consulted on the initial screening report. The responses received are as follows:

Natural England: No SEA required  
Historic England: No SEA required  
Environment Agency: No further comments to make

It is determined that as a result of the screening undertaken by the Council in Section 1, along with the responses received from the statutory consultation bodies, a Strategic Environmental Assessment is not required.

<sup>10</sup> Schedule 1 development is listed here: <http://www.legislation.gov.uk/ukSI/2011/1824/schedule/1/made>

<sup>11</sup> Schedule 2 development is listed here: <http://www.legislation.gov.uk/ukSI/2011/1824/schedule/2/made>

## **HRA**

A screening assessment to determine the need for a HRA in line with the Regulations and guidance was undertaken and can be found in Section 2 of this report. The Council has concluded that the draft PNP is unlikely to have an adverse effect on a European site (as defined in the Conservation of Habitats and Species Regulations 2010), alone or in combination with other plans and projects. The assessment also expects that all the PNP policies will be in conformity with the local plan policies which have undergone HRA screening, which identified no likely significant effects will occur as a result of the implementation of policies. Where conflicts are likely to occur, appropriate mitigation measures have been incorporated into the local plan policies.

Each of the three statutory consultation bodies with environmental responsibilities have been consulted on the initial screening report. The comments received are as follows:

Natural England: No HRA required

Historic England: No comments relating to HRA

Environment Agency: No further comments to make

It is determined that as a result of the screening undertaken by the Council in Section 2, along with the responses received from the statutory consultation bodies, a Habitats Regulation Assessment is not required.

## **EIA**

It is concluded that the proposed project – the PNP – does not fall within the remit of the Regulations, and is not likely to have a significant effect on the environment (as per assessments above), and therefore does not require an assessment.

Each of the three statutory consultation bodies with environmental responsibilities have been consulted on the initial screening report. The responses received are as follows:

Natural England: No EIA required

Historic England: No comments relating to EIA

Environment Agency: No further comments to make

It is determined that as a result of the screening undertaken by the Council in Section 3, along with the responses received from the statutory consultation bodies, an Environmental Impact Assessment is not required.

## **APPENDIX A: Consultation Responses**

From: Fensome, Gillian (NE) <Gillian.Fensome@naturalengland.org.uk> Sent: Fri 12/02/2016 1  
To: Wai-Po Poon  
Cc:  
Subject: 175830, DPN - Draft Screening Opinion for Pyrford Neighbourhood Plan

Message  
Email request.pdf (36 KB)  
Pyrford Neighbourhood Plan v 14.pdf (4 MB)  
SEA & HRA Screening Opinion\_Preliminary Draft Sent to Statutory Consultees 1.pdf (305 KB)

Dear Wai-Po

Thank you for your email consultation request concerning the above. I agree that the Pyrford Neighbourhood Plan does not need to conduct a full SEA, HRA and EIA, for the reasons set out in your email below. If the contents of the Neighbourhood Plan should change, however, we reserve the right to change our view of whether an SEA, HRA and/or EIA is required.

If you have any queries, please do not hesitate to contact me.

Yours sincerely

Gillian Fensome  
Adviser  
Sustainable Development and Regulation  
Thames Valley Team  
07879 800855

**Natural England,  
Area 3A Nobel House,  
17 Smith Square,  
London  
SW1P 2AL**

[www.gov.uk/natural-england](http://www.gov.uk/natural-england)

From: Byrne, Alan <Alan.Byrne@HistoricEngland.org.uk> Sent: Fri 12/02/2016 16  
To: Wai-Po Poon  
Cc:  
Subject: Consultation on Pyrford Neighbourhood Plan Screening Determination

Dear Wai-Po

Thank you for your email dated 11 January 2016 consulting us on your intention of carrying out a SEA/SA 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 and we concur with the outcome of the screening report.

Best Regards,

Alan

Alan Byrne  
Historic Environment Planning Adviser  
National Planning and Conservation Department  
Direct Line: 01483 252020  
Historic England | South East | Eastgate Court  
195-205 High Street | Guildford | GU1 3EH

We have launched four new, paid-for Enhanced Advisory Services, providing enhancements to our existing free planning and listing services. For more information on the new Enhanced Advisory Services as well as our free services go to our website: [HistoricEngland.org.uk/EAS](http://HistoricEngland.org.uk/EAS)

Ms Wai-Po Poon  
Woking Borough Council  
Policy & Performance  
Civic Offices Gloucester Square  
Woking  
Surrey  
GU21 6YL

Our ref: WA/2011/110020/SE-  
05/SC1-L01  
Your ref:  
Date: 16 February 2016

Dear Ms Poon

**Re: Screening of Pyrford Neighbourhood Plan - SEA and HRA SA/SEA**

Thank you for consulting the Environment Agency on the Strategic Environment Impact Assessment (SEA) and Habitats Regulations Assessment (HRA) Screening Report for the Pyrford Neighbourhood Plan. This consultation was received on the 11 January 2016.

Part of the area of the neighbourhood plan is affected by flood zones 3 and 2. However, as highlighted in the screening report, the neighbourhood plan does not allocate any sites for housing or other land uses and it will support and uphold the general principle of strategic policies as detailed in the Woking Core Strategy.

Therefore, we have no comments to make on your conclusion that a SEA and HRA are not required.

If you require any further information then please do not hesitate to contact me.

Yours sincerely

**Miss Donatella Cillo**  
Sustainable Places | Planning Advisor

Direct dial 0118953 5498  
Email: [planning-farnham@environment-agency.gov.uk](mailto:planning-farnham@environment-agency.gov.uk)

EAst\_d\_letterhead

## APPENDIX B: European sites located within 20km of Woking Town Centre.

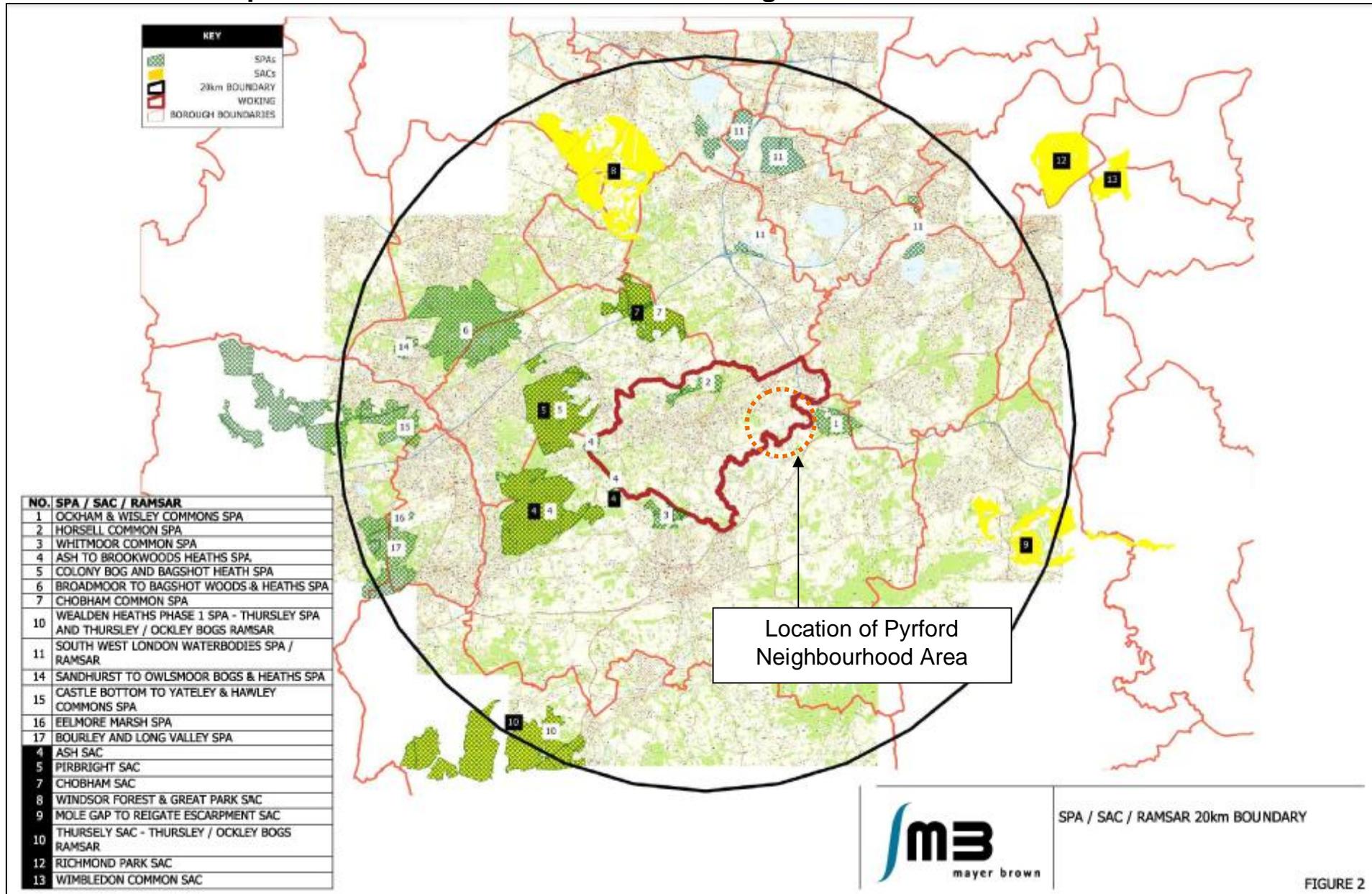


FIGURE 2

**APPENDIX C: Conservation Objectives, Qualifying Features and Ecological Indicators**

Site	Conservation Objectives	Qualifying Features	Indicators
<p>Thursley, Ash, Pirbright and Chobham SAC – comprised of 4 SSSIs</p>	<p>Avoid the deterioration of the qualifying natural habitats and the habitats of qualifying species, and the significant disturbance of those qualifying species, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving 'Favourable Conservation Status' of each of the qualifying features.</p> <p>Subject to natural change, to maintain or restore:</p> <ul style="list-style-type: none"> <li>• The extent and distribution of qualifying natural habitats and habitats of qualifying species;</li> <li>• The structure and function (including typical species) of qualifying natural habitats and habitats of qualifying species;</li> <li>• The supporting processes on which qualifying natural habitats and habitats of qualifying species rely;</li> <li>• The populations of qualifying species;</li> <li>• The distribution of qualifying species within the site.</li> </ul> <p>Biodiversity 2020 Strategy:</p> <ul style="list-style-type: none"> <li>• Meet or support Biodiversity 2020 actions for SAC habitats and species present on SAC areas that were part of the reason for its designation as an internationally important site.</li> </ul>	<p>H4010. Northern Atlantic wet heaths with <i>Erica tetralix</i>; Wet heathland with cross-leaved heath</p> <p>H4030. European dry heaths</p> <p>H7150. Depressions on peat substrates of the <i>Rhynchosporion</i></p>	<ul style="list-style-type: none"> <li>• Reported levels of damage to designated sites</li> <li>• Conclusions of relevant specialist assessments</li> <li>• Reported condition of SAC sites and their constituent SSSI units</li> <li>• Published reports from relevant lead partner/agencies delivering Biodiversity 2020 Strategy</li> <li>• Available information regarding species population/habitat extent and condition from Natural England, local Wildlife Trusts, RSPB etc.</li> </ul>
<p>Thames Basin Heaths SPA – comprised of 13 SSSIs</p>	<p>Avoid the deterioration of the habitats of the qualifying features, and the significant disturbance of the qualifying features, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving the aims of the Birds</p>	<p>A224 <i>Caprimulgus europaeus</i>; European nightjar (Breeding)</p> <p>A246 <i>Lullula</i></p>	<ul style="list-style-type: none"> <li>• Reported levels of damage to designated sites</li> <li>• Conclusions of relevant specialist assessments</li> <li>• Reported condition of SPA</li> </ul>

	<p>Directive.</p> <p>Subject to natural change, to maintain or restore:</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 populations of the qualifying features;</li> <li>• The distribution of the qualifying features within the site.</li> </ul> <p>Biodiversity 2020 Strategy:</p> <ul style="list-style-type: none"> <li>• Meet or support Biodiversity 2020 actions for SPA habitats and species present on SPA areas that were part of the reason for its designation as an internationally important site.</li> </ul>	<p><i>arborea</i>; Woodlark (Breeding)</p> <p>A302 <i>Sylvia undata</i>; Dartford warbler (Breeding)</p>	<p>sites</p> <ul style="list-style-type: none"> <li>• Published reports from relevant lead partner/agencies delivering Biodiversity 2020 Strategy</li> <li>• Available information regarding species population/habitat extent and condition from Natural England, local Wildlife Trusts, RSPB etc.</li> </ul>
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