

# **St James's Neighbourhood Plan 2022-2040**

## **Strategic Environment Assessment Screening Report and Habitats Regulations Assessment Screening Report July 2024**

Prepared by Westminster City Council for St James's  
Neighbourhood Forum

Consultation carried out with Natural England, Historic England and  
The Environment Agency



City of Westminster

## Contents

1. Introduction.....	3
1.1. Legislative background.....	3
1.2. HRA requirements for neighbourhood plans.....	3
1.3. SEA requirements for neighbourhood plans.....	3
2. Summary of the neighbourhood plan.....	4
3. HRA Screening.....	7
3.1. European sites which may be affected by the Neighbourhood Plan.....	7
3.2. In combination effects.....	7
3.3. Screening outcome.....	8
4. SEA Screening.....	9
4.3. Establishing the need for SEA.....	9
4.4. Determining the likely significant effects.....	10
4.5. Screening outcome.....	13
4.6. Consultation with statutory bodies.....	13
5.3. Habitats Regulations Assessment Screening.....	13
5.4. Strategic Environmental Assessment Screening.....	13

# 1. Introduction

## 1.1. Legislative background

One of the basic conditions that will be tested by the Independent Examiner is whether the making of the neighbourhood plan is compatible with European Union obligations, including under the Habitats Directive and the Strategic Environmental Assessment (SEA) Directive.

The Habitats Directive is transposed into English law under the Conservation of Habitats and Species Regulations 2010, and seeks to avoid negative impacts on European protected sites.

The SEA Directive has been transposed into English law by the Assessment of Plans and Programmes Regulations 2004 (hereafter referred to as the SEA Regulations), and seeks to make sure that the environmental implications of a plan or programme are taken into account.

## 1.2. HRA requirements for neighbourhood plans

The purpose of a Habitats Regulations Assessment (HRA) is to identify whether a plan is likely to have a significant effect on a European site, either alone or in combination with other plans or projects. The first step of the appropriate assessment process is a screening assessment, which' purpose is to screen out if any significant effect is likely for any European site, based on objective information. Where there is a risk of a significant effect on a European site, either individually or in combination with other plans or projects, then there will be a requirement to progress to an Appropriate Assessment.

## 1.3. SEA requirements for neighbourhood plans

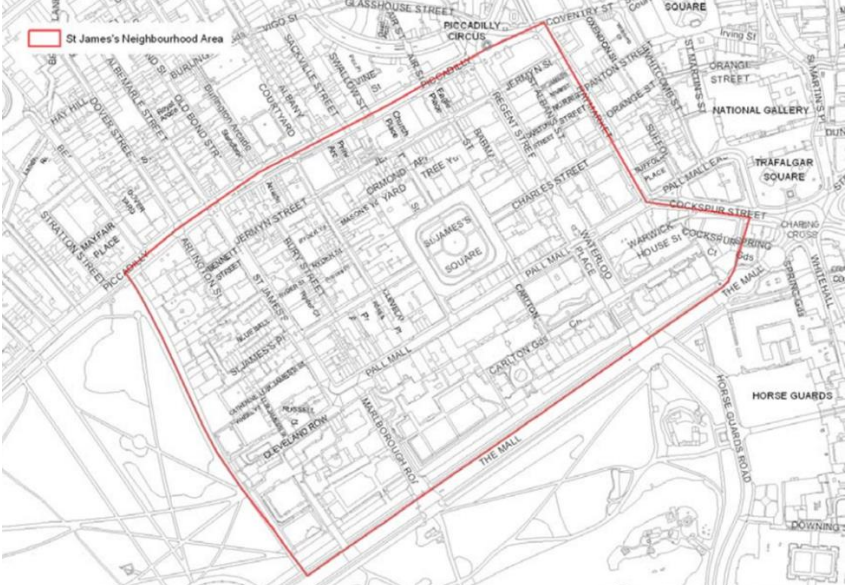
Draft neighbourhood plan proposals are required to be assessed to determine whether the plan is likely to have significant environmental effects, which is commonly referred to as a "screening" exercise. If likely significant environmental effects are identified, a strategic environmental assessment will be required in accordance with the SEA regulations.

The National Planning Practice Guidance provides examples of when a strategic environmental assessment may be required:

- a neighbourhood plan allocates sites for development
- the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan
- the neighbourhood plan is likely to have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan.

If the requirement for a Habitat Regulations Assessment is identified, then a plan will normally also require a strategic environmental assessment.

## 2. Summary of the neighbourhood plan

Name of the neighbourhood plan	St James's Neighbourhood Plan
Geographic coverage of the plan	<p>The St James's Neighbourhood Area (the area) is located within the south-eastern corner of the City of Westminster municipal boundaries. The area is located adjacent to the prominent areas such as Mayfair and Soho to the north, Green Park to the west, St James's Park to the south, and the West End including Leicester Square, Charing Cross and Covent Garden to the east.</p> <p>The area is mixed use in nature, comprising both commercial uses such as office space, retail and hospitality, as well as some predominantly residential areas.</p> <p>The area is subject to a number of spatial designations under the applicable planning framework comprising the London Plan (2021) and Westminster's City Plan 2019-2040, including forming part of the Central Activities Zone, West End Retail and Leisure Special Policy Area, and the Mayfair and St James's Special Policy Area.</p> <p>The designated Neighbourhood Area is depicted in Figure 1 below:</p>  <p>Figure 1 - St James's Neighbourhood Area</p>
Vision of the plan	<p>The vision of the St James's Neighbourhood Plan is as follows:</p> <p><i>“St. James's is a unique treasure in the West End, whose area has retained its dignified character and heritage that makes it an area of quiet elegance and prestige.</i></p> <p><i>Over the period the area will have sustained a successful balance of commercial and residential quality and urban calm, distinct from and complementary to the neighbouring high intensity areas of Leicester Square, Soho, Mayfair, Trafalgar Square and the Royal Parks. The rectangular street grid that forms the core of the area remains a quiet and safe space for pedestrians and cyclists, complemented by increased pedestrianisation and high quality public realm improvements.</i></p> <p><i>The mutually supporting, new and historic mix of specialist uses and buildings, around the the monarch's royal court at St. James's Palace,</i></p>

	<p><i>has been retained and enhanced, with the shops, galleries, hotels and clubs retaining the features that enable them to provide so much of what is quintessentially St James's. Yet this has been done in a manner which enables St James's' to remain relevant to today's central London high quality commercial, residential and cultural activities. It has also been done with the intention of maximising sustainability and resilience through the retrofitting of buildings to be low energy and low carbon and taking every opportunity to enhance the biodiversity value of St James's spaces and buildings."</i></p>
<p>Key issues/objectives</p>	<p>The plan seeks to address local issues through the following five objectives:</p> <ul style="list-style-type: none"> <li>• <b>Retain and enhance the traditional, calm, dignified character and heritage of St. James's and its existing pattern of commercial, residential and cultural activity and associated land uses.</b> Development will respect and reflect the character and heritage of the distinct Character Areas in St James's, with growth and change being of a high quality of design that preserves the architectural quality of the area. Certain types of use will be focused upon those areas best able to accommodate them. In particular commercial activity will be focused in the Central Activities Zone (CAZ) Retail Clusters of Piccadilly and Jermyn Street. Development will provide the type of accommodation that 21st Century occupiers need.</li> <li>• <b>To continue to be a destination which provides unique shopping, dining and socialising experiences for those that live and work in the area as well as to visitors.</b> This is both during the week and at weekends. The specialist and independent retailers and restaurants will be supported and encouraged, as will the heritage of established private members' clubs, which have a key role in fostering a sense of local community and the identity of the area.</li> <li>• <b>Maintain the balance of heritage, dignity and commercial viability.</b> As more people seek to experience the unique environment of St. James's, the increase in footfall and commercial activity will need to be managed. This will require the location of facilities that attract such activity in areas that have the greatest existing capacity and improve access routes to them, without compromising the calm that characterises much of the district's character.</li> <li>• <b>Make St. James's an even better place in which to live.</b> An improved public realm with fewer vehicles, creating less disturbance, noise and air pollution will complement the world-class mix of existing and new uses. The streets which can accommodate more growth will be managed so that they provide an improved experience for pedestrians and cyclists whilst protecting residential amenity.</li> <li>• <b>Ensure development and change is genuinely sustainable and reflects the need for climate resilience.</b> Whilst retaining and enhancing the character and heritage of St James's is paramount to the area being able to thrive, development and growth must recognise the importance of minimising its impact on the climate and environment and being designed to be more resilient.</li> </ul>

Summary of policies

**POLICY STJ1: CHARACTER AND DESIGN**

This policy seeks to ensure development demonstrates high quality, sustainable and inclusive design and architecture.

**POLICY STJ2: ROOFTOP PLANT AND ACTIVITY**

This policy seeks to control rooftop development by ensuring that plant and equipment is sensitively located and designed, while also allowing for the use of rooftops for activity that is ancillary to the main use of the building.

**POLICY STJ3: SHOPFRONTS AND SIGNAGE**

This policy seeks to ensure that the design of shopfronts and signage is reflective of the prevailing character of the area and consider other matters such as limiting the potential for antisocial behaviour through the design of building entrances.

**POLICY STJ4: VIEWS**

This policy seeks to ensure that development respects or enhances identified 'local' and 'metropolitan' view corridors.

**POLICY STJ5: HOTELS**

This policy seeks to ensure new proposals for hotel uses protect residential amenity.

**POLICY STJ6: PRIVATE MEMBERS' CLUBS**

This policy seeks to protect existing private members clubs within the area.

**POLICY STJ7: PUBLIC REALM**

This policy seeks to encourage improvements to the public realm through measures such as reducing clutter from unnecessary street furniture and securing contributions from major development.

**POLICY STJ8: WALKING AND CYCLING**

This policy seeks to encourage active transport through the provision of infrastructure and facilities such as footway widening, access routes over private land and secure cycle parking.

**POLICY STJ9: ENERGY AND BUILDING FABRIC**

This policy seeks to promote climate change adaptation for the built environment through measures to reduce energy use in buildings, the use of sustainable building materials and the sensitive retrofitting of heritage assets.

**POLICY STJ10: GREEN ROOFS**

This policy seeks to encourage the provision of green infrastructure on rooftops and provides a range of considerations such as species selection, maintenance requirements and the like.

## 3. HRA Screening

### 3.1. European sites which may be affected by the Neighbourhood Plan

For this assessment four Special Areas of Conservation (SACs) and two Special Protection Areas have been identified which will be assessed in accordance with the requirements of the Habitats Directive. These are as follows:

- Wimbledon Common SAC
- Richmond Park SAC
- Epping Forest SAC
- Essex Estuaries SAC
- Thames Estuary and Marshes Special Protection Area and Ramsar
- Lee Valley Special Protection Area and Ramsar

The site characteristics and conservation objectives of these sites can be found in Annex 1.

The closest protected European Sites to the St James's Neighbourhood Area are the Lee Valley and the Epping Forest SAC which are approximately 10.5km and 15km from the area respectively. These sites are considered too far from the plan area to be given further consideration. The only European Sites within 10km are the Wimbledon Common and Richmond Park SACs.

Westminster City Council has conducted a screening exercise for the whole of Westminster as part of the revision of its City Plan 2019-2040 which concludes<sup>1</sup>:

*"No likely significant impacts on Wimbledon Common SAC and Lee Valley Special Protection Area and Ramsar have been identified, as Westminster is outside of the core recreational catchment of these sites. No likely significant impacts on Richmond Park SAC have been identified as development in Westminster is unlikely to impact on habitats on the site.*

*Overall, no likely significant impacts on any European sites have been identified, either alone or in combination. Therefore, no amendments to the City Plan are required and it will not be necessary to progress to the Appropriate Assessment stage."*

The St James's Neighbourhood Plan does not contain any proposals that impose a potential impact pathway to any European sites. The area is outside of the recreational catchment of the sites identified above and it is unlikely that any policies, plans or projects in the plan will result in an impact on traffic movement to or from any of these sites. The conclusions of the screening for the City Plan 2019-2040 therefore also apply to the proposals in the St James's Neighbourhood Plan.

The St James's Neighbourhood Plan does not allocate any sites for development. Due to the scale and nature of the proposals in the St James's Neighbourhood Plan, which focuses on policies protecting building character and design, amenity, promoting sustainable transport and encouraging sustainable design, it is unlikely that any proposals in the plan will result in any significant effects to European sites in combination with these projects.

### 3.2 In combination effects

Other plans that may impact upon the assessed European sites include the Mayor of London's London Plan, the Westminster City Plan, Local Plans of other London Borough's and other neighbourhood plans in London.

Westminster City Council states:

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<sup>1</sup> [HRA Screening Report, Westminster City Council \(June 2019\)](#)

*“It is neither practical or necessary to assess the ‘in combination’ effects of a draft neighbourhood plan within the context of all other plans and projects within London. It is, however, recognised that there are a number of interlocking and very complex factors constantly taking place in London as a whole – population change, travel patterns, larger-scale redevelopments, resource use and climate change, for example. The most obvious influences on the European sites, considering London as whole, will be changes to air quality, water resources, and increase in recreational use from growing visitor numbers as the population of the South-east grows further.*

*Air pollution associated with growth arising from Special Policy Area policies and Policies Map updates would be primarily be as a result of increases in traffic and construction activity and any associated plant and machinery associated with any new buildings. However, Westminster’s Air Quality Action Plan 2013-2016 (published April 2013) seeks to redress these matters alongside emerging policies for sustainable development including those in later revisions to Westminster’s City Plan. Westminster has limited opportunities for large scale growth and the majority of development is on sites with existing development and involves relatively small change. In addition, Westminster is well served by public transport and this is likely to improve with the arrival of Cross Rail.*

*It is considered that the Westminster’s policies, in conjunction with those from other authorities and NPPF requirements for sustainable development will contribute to improving air quality over time in the South-East over time and that any changes arising from the Special Policy Areas and Policies Map Revision are not likely to affect the Natura 2000 sites.”*

It is unlikely that any proposals in the plan and programmes in the local area will result in any ‘in combination’ effects on European sites.

### **3.3. Screening outcome**

It is concluded that no full HRA needs to be undertaken as there are no likely effects on European sites.

The views of Natural England will be sought in late July 2024.

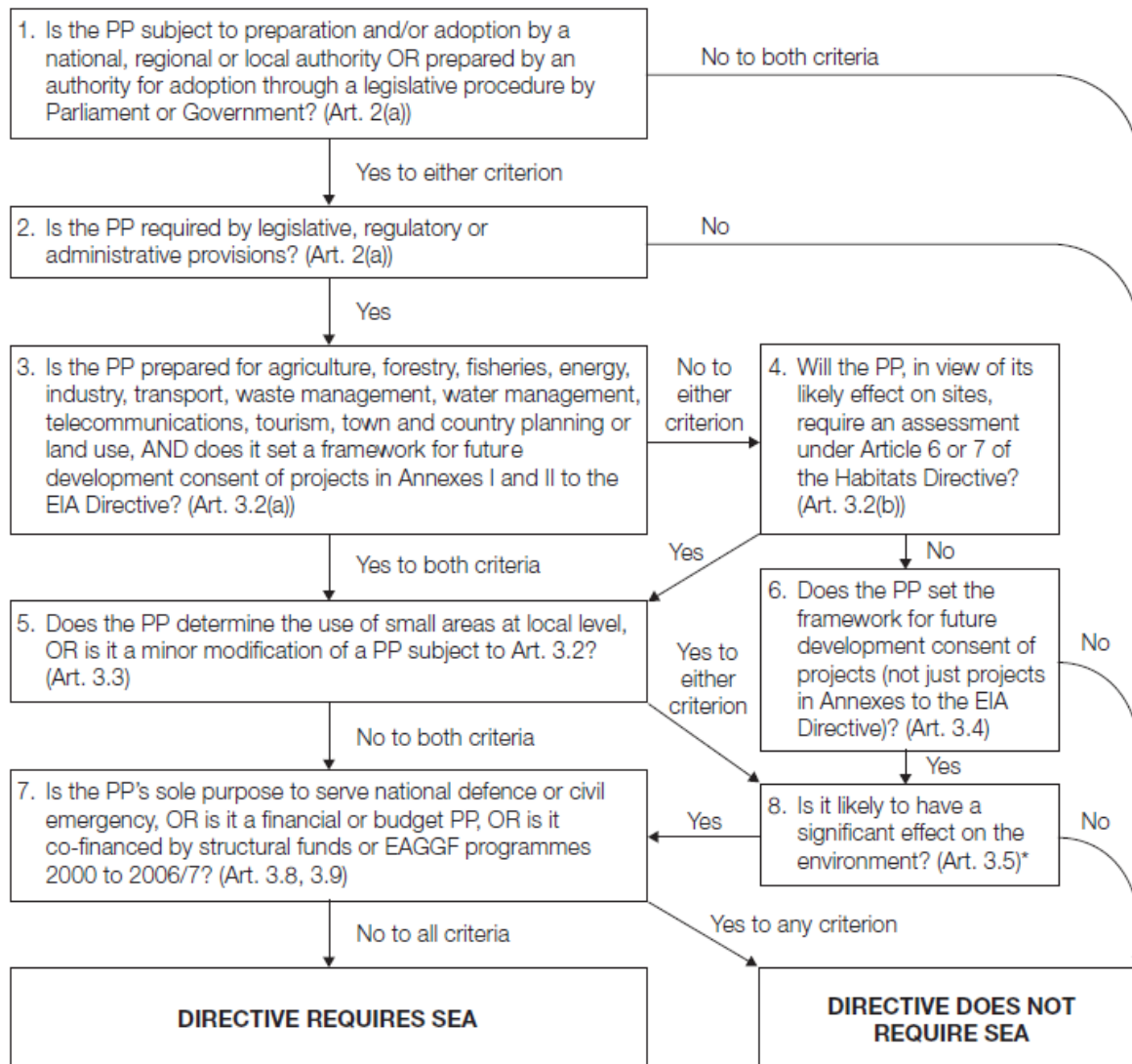


## 4. SEA Screening

### 4.3. Establishing the need for SEA

Practical guidance on the application of the SEA Directive published in 2005 by the predecessor of the Ministry of Housing, Communities, & Local Government sets out a flow chart to establish the need for SEA. This flow chart is duplicated below, after which the need for SEA for the St James's Neighbourhood Plan is established.

Figure 2 SEA flowchart



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

Table 1 Establishing the need for SEA

Assessment criteria	Assessment	
Is the Plan 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))	The Plan is being prepared by the St James's Neighbourhood Forum under the provisions of the Town and Country Planning Act 1990 as amended by the Localism Act 2011 and will be "made" by Westminster City Council under the Planning and Compulsory Purchase Act 2004.	Yes
Is the Plan required by legislative, regulatory or administrative provisions? (Art 2(a))	There is no requirement to produce a neighbourhood plan, however, they are subject to formal procedures and regulations laid down by Government.	Yes
Is the Plan 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))	The St James's Neighbourhood Plan is prepared for town and country planning purposes.  It does not explicitly set a framework for future development consent of projects in Annexes I or II of the EIA Directive.	No
Will the Plan in view of its likely effect on sites, require an assessment under Article 6 or 7 of the Habitats directive?	The St James's Neighbourhood Plan could potentially have an impact on European protected sites protected by the Habitats Directive.	Yes
Does the Plan determine the use of small areas at local level OR is it a minor modification of a Plan subject to Art3.2? (Art 3.3)	The St James's Neighbourhood Plan seeks to direct and shape future uses, building upon Westminster's City Plan 2019-2040 and will provide a framework for future development consent of projects in the area.	Yes
Is it likely to have a significant effect on the environment? (Art 3.5)	See the results of table 2 'Determining the likely significant effects'	No

#### 4.4. Determining the likely significant effects

The likely significant environmental; effects of a neighbourhood plan depend on the contents of the plan. The criteria for assessing any likely significant effects on the environment are specified in Schedule 1 of the SEA Regulations.

The table below sets out these criteria, along with a consideration of the likely impact of the neighbourhood plan against each of the criteria.

Table 2 Determining the likely significant effects

SEA Regulations Criteria	Comments	Likely Significant Effects?
<b>1. The characteristics of the neighbourhood plan, having regard, in particular, to:</b>		
1a) The degree to which the neighbourhood plan sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources	Once 'made', the St James's Neighbourhood Plan will set out a framework with which to manage development and change in the area including: <ul style="list-style-type: none"> <li>- Enhancing building character and design;</li> <li>- Placing requirements on the location and screening of rooftop plant;</li> </ul>	No

	<ul style="list-style-type: none"> <li>- Placing design requirements on shopfronts and signage to ensure these are in-keeping with the area;</li> <li>- Protecting local view corridors from encroachment by development;</li> <li>- Ensuring hotel uses respect residential amenity;</li> <li>- Protecting the use of existing private members clubs in the area;</li> <li>- Encouraging public realm improvements;</li> <li>- Encouraging the implementation of measures to increase sustainable transport uptake;</li> <li>- Promoting sensitive interventions into the fabric of buildings to improve their energy efficiency and reduce embodied carbon; and</li> <li>- Promoting the inclusions of green infrastructure on rooftops.</li> </ul> <p>However, the St James's Neighbourhood Plan does not allocate any new development sites in the plan. All the projects outlined above are of a local scale and link in with wider initiatives.</p>	
1b) The degree to which the neighbourhood plan influences other plans and programmes including those in a hierarchy	The St James's Neighbourhood Plan will form part of the development plan for the City of Westminster, and will together with the City Plan 2019-2040 and London Plan (2021) be used to determine planning applications. The St James's Neighbourhood Plan is required to be in general conformity with the City Plan and so it will not influence any other plans.	No
1c) The relevance of the neighbourhood plan for the integration of environmental considerations in particular with a view to promoting sustainable development	Achieving sustainable development is at the heart of the National Planning Policy Framework, and is one of the basic conditions that Neighbourhood Plans must meet. The likelihood of significant effects on the environment is therefore minimised. The St James's Neighbourhood Plan seeks to improve the local environment and policies encourage sustainable development, particularly relating to supporting energy efficiency within buildings, supporting active transport provision and sustainable modes of transport, as well as policies to preserve and enhance heritage assets and allow for biodiversity net gain through green infrastructure on rooftops.	No
1d) Environmental problems relevant to the neighbourhood plan	<p>The Neighbourhood Area is located within a 'Surface Water Flood Risk Hotspot Zone' and is also partially identified as an area of 'Open Space Deficiency' under Westminster's City Plan 2019-2024.</p> <p>The plan's ambitions to create new green and open spaces, public realm improvements, high standards of sustainable design, and ambition to enhance sustainable travel seek to address these environmental problems.</p>	No
1e) The relevance of the neighbourhood plan for the implementation of Community	The St James's Neighbourhood Plan has to be in general conformity with the Westminster City Plan	No

legislation on the environment (for example, plans and programmes linked to waste management or water protection).	2019-2040, which is already in conformity with such legislation.  The St James's Neighbourhood Plan does not contain any proposals of relevance for the implementation of Community legislation on the environment.	
<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	Policies that seek to encourage the provision of new open and play space, biodiversity net gain through green infrastructure and high-quality sustainable design to increase energy efficiency are likely to be beneficial in the long-term and are permanent outcomes.	No
2b) The cumulative nature of the effects	The St James's Neighbourhood Plan will, together with Westminster's City Plan and London Plan (2021), form part of the development plan. Any cumulative effects of these policies have been examined and tested and the proposals in the St James's Neighbourhood Plan are therefore unlikely to have a significant effect on the local environment.	No
2c) The transboundary nature of the effects	The effects of the St James's Neighbourhood Plan will be limited to the St James's Neighbourhood Area.	No
2d) The risks to human health or the environment (for example, due to accidents)	The St James's Neighbourhood Plan is likely to have a positive or neutral effect on human health by supporting the provision of additional open space, public realm improvements, encouraging biodiversity net gain through green infrastructure and tree planting, and supporting more sustainable urban design whilst improving energy efficiency of buildings.	No
2e) The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)	There are approximately 11,075 people living within the St James's Ward, which encompasses the St James's Neighbourhood Area and areas further east, west and south, according to data provided through the 2021 Census and Westminster's 2022 City Survey. The St James's Neighbourhood Plan is not considered to affect areas beyond the neighbourhood planning area.	No
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	There are no sites of special scientific interest in the St James's Neighbourhood Area.  Most of the St James's Neighbourhood Area is within the St James's Conservation Area, whilst it also exhibits a high number of statutorily listed buildings and registered London Squares.  Policies within the St James's Neighbourhood Plan seek to protect the character and significance of these heritage assets, as well as protecting the setting of these through protecting Local Views which frame the setting of many of these assets. The St James's Neighbourhood Plan also designates additional buildings considered to be of local special architectural, cultural or historical significance.	No

	The St James's Neighbourhood Plan recognises development pressures and seeks to set a framework for protecting heritage characteristics, having a positive impact.	
2g) The effects on areas or landscapes which have a recognised national, Community or international protection status	The St James's Neighbourhood Area has the Primrose Hill summit to the Palace of Westminster Protected Vista and the Parliament Hill summit to the Palace of Westminster Protected Vista running through the Neighbourhood Area. The Area is also located with the Westminster and Whitehall Archaeological Priority Areas (Tier 1). The Area is also covered in its entirety by the St James's Conservation Area. Proposals in the St James's Neighbourhood Plan are not expected to significantly impact upon these areas and designations as it does not propose or allocate large scale developments that are incongruous with these designations.	No

#### 4.5. Screening outcome

Having reviewed the St James's Neighbourhood Plan against the requirements in the SEA Directive, it is concluded that the Plan is unlikely to have significant environmental effects and accordingly should not be subject to Strategic Environmental Assessment.

#### 4.6. Consultation with statutory bodies

The screening determination is subject to consultation with the statutory consultation bodies. The consultation bodies are specified in the Environmental Assessment of Plans and Programmes Regulations 2004 and are as follows:

- Historic England;
- Environment Agency; and
- Natural England.

All of these statutory bodies were consulted on the councils screening assessment in late July 2024, and in their response (refer to Annex 2), none have raised any concerns that would suggest that the St James's Neighbourhood Plan would have significant impacts that would require a full Strategic Environmental Assessment or Habitats Regulations Assessment to be carried out. A copy of the response from each of these bodies can be found in Annex 2 below.

### 5. Conclusion

#### 5.3. Habitats Regulations Assessment Screening

The HRA screening assessment concludes that there no likely significant effects in respect of European sites. Further stages of Appropriate Assessment are therefore not required.

#### 5.4. Strategic Environmental Assessment Screening

The SEA screening assessment concludes that the St James's Neighbourhood Plan as drafted is unlikely to have significant environmental effects. The St James's Neighbourhood Plan therefore does not need to be subject to a Strategic Environmental Assessment.

## Annex 1 Site characteristics and conservation objectives

This information has been derived from the Joint Nature Conservation Committee and has been provided by Westminster City Council.

### Wimbledon Common

<b>Location of Wimbledon Common Special Areas of Conservation</b>	
Country	England
Unitary Authority	Merton; Wandsworth
Grid Ref*	TQ227719
Latitude	51 25 56 N
Longitude	00 14 04 W
SAC EU code	UK0030301
Status	Designated Special Area of Conservation (SAC)
Area (ha)	348.31
* This is the approximate central point of the SAC. In the case of large, linear or composite sites, this may not represent the location where a feature occurs within the SAC.	
<b>General site character</b>	
Inland water bodies (standing water, running water) (1%)	
Bogs. Marshes. Water fringed vegetation. Fens (0.5%)	
Heath. Scrub. Maquis and garrigue <i>Phygrana</i> (5%)	
Dry grassland. Steppes (45%)	
Improved grassland (3.5%)	
Broad-leaved deciduous woodland (45%)	
<b>Annex I habitats that are a primary reason for selection of this site</b>	
Not applicable	
<b>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site</b>	
<b>4010</b> Northern Atlantic wet heaths with <i>Erica tetralix</i>	
<b>4030</b> European dry heaths	
<b>Annex II species that are a primary reason for selection of this site</b>	
<b>1083</b> Stag beetle <i>Lucanus cervus</i>	
Wimbledon Common has a large number of old trees and much fallen decaying timber. It is at the heart of the south London centre of distribution for <b>stag beetle</b> <i>Lucanus cervus</i> , and a relatively large number of records were received from this site during a recent nationwide survey for the species (Percy <i>et al.</i> 2000). The site supports a number of other scarce invertebrate species associated with decaying timber.	
<b>Annex II species present as a qualifying feature, but not a primary reason for site selection</b>	
Not applicable.	

### Richmond Park

<b>Location of Richmond Park Special Areas of Conservation</b>	
Country	England
Unitary Authority	Richmond upon Thames
Grid Ref*	TQ199728
Latitude	51 26 27 N

Longitude	00 16 28 W
SAC EU code	UK0030246
Status	Designated Special Area of Conservation (SAC)
Area (ha)	846.68
* This is the approximate central point of the SAC. In the case of large, linear or composite sites, this may not represent the location where a feature occurs within the SAC.	
<b>General site character</b>	
Inland water bodies (standing water, running water) (1.5%)	
Bogs. Marshes. Water fringed vegetation. Fens (0.5%)	
Heath. Scrub. Maquis and garrigue. Phygrana (25%)	
Dry grassland. Steppes (18%)	
Humid grassland. Mesophile grassland (5%)	
Improved grassland (20%)	
Broad-leaved deciduous woodland (25%)	
Mixed woodland (5%)	
<b>Annex I habitats that are a primary reason for selection of this site</b>	
Not applicable	
<b>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site</b>	
Not applicable.	
<b>Annex II species that are a primary reason for selection of this site</b>	
<b>1083</b> Stag beetle <i>Lucanus cervus</i>	
Richmond Park has a large number of ancient trees with decaying timber. It is at the heart of the south London centre of distribution for <b>stag beetle <i>Lucanus cervus</i></b> , and is a site of national importance for the conservation of the fauna of invertebrates associated with the decaying timber of ancient trees.	
<b>Annex II species present as a qualifying feature, but not a primary reason for site selection</b>	
Not applicable.	

### Epping Forest

<b>Location of Epping Forest Special Areas of Conservation</b>	
Country	England
Unitary Authority	Essex
Grid Ref*	TQ399959
Latitude	51 38 39 N
Longitude	00 01 21 E
SAC EU code	UK0012720
Status	Designated Special Area of Conservation (SAC)
Area (ha)	1604.95
* This is the approximate central point of the SAC. In the case of large, linear or composite sites, this may not represent the location where a feature occurs within the SAC.	
<b>General site character</b>	
Inland water bodies (standing water, running water) (6%)	
Bogs. Marshes. Water fringed vegetation. Fens (0.2%)	
Heath. Scrub. Maquis and garrigue. Phygrana (3.8%)	

Dry grassland. Steppes (20%) Broad-leaved deciduous woodland (70%)
<b>Annex I habitats that are a primary reason for selection of this site</b>
<b>9120</b> Atlantic acidophilous beech forests with <i>Ilex</i> and sometimes also <i>Taxus</i> in the shrublayer ( <i>Quercion roburi-petraeae</i> or <i>Ilici-Fagenion</i> )
Epping Forest represents Atlantic acidophilous beech forests in the north-eastern part of the habitat's UK range. Although the epiphytes at this site have declined, largely as a result of air pollution, it remains important for a range of rare species, including the moss <i>Zygodon forsteri</i> . The long history of pollarding, and resultant large number of veteran trees, ensures that the site is also rich in fungi and dead-wood invertebrates.
<b>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site</b>
<b>4010</b> Northern Atlantic wet heaths with <i>Erica tetralix</i>
<b>4030</b> European dry heaths
<b>Annex II species that are a primary reason for selection of this site</b>
<b>1083</b> Stag beetle <i>Lucanus cervus</i>
Epping Forest is a large woodland area in which records of <b>stag beetle <i>Lucanus cervus</i></b> are widespread and frequent; the site straddles the Essex and east London population centres. Epping Forest is a very important site for fauna associated with decaying timber, and supports many Red Data Book and Nationally Scarce invertebrate species.
<b>Annex II species present as a qualifying feature, but not a primary reason for site selection</b>
Not applicable.

### Essex Estuaries

<b>Location of Essex Estuaries Special Areas of Conservation</b>	
Country	England
Unitary Authority	Essex
Grid Ref*	TM103048
Latitude	51 42 06 N 51.70166667
Longitude	01 02 37 E 1.043611111
SAC EU code	UK0013690
Status	Designated Special Area of Conservation (SAC)
Area (ha)	46140.82
* This is the approximate central point of the SAC. In the case of large, linear or composite sites, this may not represent the location where a feature occurs within the SAC.	
<b>General site character</b>	
Marine areas. Sea inlets (30%) Tidal rivers. Estuaries. Mud flats. Sand flats. Lagoons (including saltwork basins) (56.5%) Salt marshes. Salt pastures. Salt steppes (11%) Shingle. Sea cliffs. Islets (0.5%) Improved grassland (2%)	
<b>Annex I habitats that are a primary reason for selection of this site</b>	
<b>1130</b> Estuaries	



This is a large estuarine site in south-east England, and is a typical, undeveloped, coastal plain estuarine system with associated open coast mudflats and sandbanks. The site comprises the major estuaries of the Colne, Blackwater, Crouch and Roach rivers and is important as an extensive area of contiguous estuarine habitat. Essex Estuaries contains a very wide range of characteristic marine and estuarine sediment communities and some diverse and unusual marine communities in the lower reaches, including rich sponge communities on mixed, tide-swept substrates. Sublittoral areas have a very rich invertebrate fauna, including the reef-building worm *Sabellaria spinulosa*, the brittlestar *Ophiothrix fragilis*, crustaceans and ascidians. The site also has large areas of saltmarsh and other important coastal habitats.

**1140** Mudflats and sandflats not covered by seawater at low tide

Essex Estuaries represents the range of variation of this habitat type found in south-east England and includes the extensive intertidal **mudflats and sandflats** of the Colne, Blackwater, Roach and Crouch estuaries, Dengie Flats and Maplin Sands. The area includes a wide range of sediment flat communities, from estuarine muds, sands and muddy sands to fully saline, sandy mudflats with extensive growths of eelgrass *Zostera* spp. on the open coast. The open coast areas of Maplin Sands and Dengie Flats have very extensive mudflats and an unusually undisturbed nature. Maplin Sands is particularly important for its large, nationally-important beds of dwarf eelgrass *Zostera noltei* and associated animal communities.

**1310** Salicornia and other annuals colonising mud and sand

Glasswort *Salicornia* spp. saltmarsh in the Essex estuaries on the east coast of England forms an integral part of the transition from the extensive and varied intertidal mud and sandflats through to upper saltmeadows. Although the saltmarshes in this area are generally eroding, secondary pioneer communities appear as a precursor to erosion on the seaward edge of degraded mid-marsh communities. The area of pioneer marsh includes gradation into extensive cord-grass *Spartina* spp. swards.

**1320** *Spartina* swards (*Spartinion maritimae*)

The most extensive remaining stand of the native small cord-grass *Spartina maritima* in the UK and possibly in Europe is found in the Essex Estuaries. The stand is located at Foulness Point and covers approximately 0.17 ha. Other smaller stands are found elsewhere in the estuary complex, notably in the Colne estuary, where it forms a major component of the upper marsh areas.

**1330** Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*)

Although the saltmarshes in this area are generally eroding, extensive salt meadows remain and Essex Estuaries represents **Atlantic salt meadows** in south-east England, with floristic features typical of this part of the UK. Golden samphire *Inula crithmoides* is a characteristic species of these marshes, occurring both on the lower marsh and on the drift-line. It represents a community of south-east England also found to the south in mainland Europe.

**1420** Mediterranean and thermo-Atlantic halophilous scrubs (*Sarcocornetea fruticosi*)

In this complex of estuarine marshes on the east coast of England the occurrence of **Mediterranean and thermo-Atlantic halophilous scrubs** is currently artificially restricted by sea-walls. It now occurs principally as a strandline community or at the foot of sea-walls. Recent managed retreat schemes offer the prospect of future expansion of the habitat type. The local variant of this vegetation, which features sea-lavenders *Limonium* spp. and sea-heath *Frankenia laevis*, occurs at one location, Colne Point.

**Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site**

1110 Sandbanks which are slightly covered by sea water all the time
<b>Annex II species that are a primary reason for selection of this site</b>
Not applicable.
<b>Annex II species present as a qualifying feature, but not a primary reason for site selection</b>
Not applicable.

### Thames Estuary and Marshes

<b>Location Thames Estuary and Marshes Special Protection Area and Ramsar</b>	
Country	England
Unitary Authority	Essex (10%) Kent (90%)
Latitude	51 29 08 N
Longitude	00 35 47 E
Special Protection Area EU code	UK9012021
Ramsar EU code	UK11069
Status	Special Protection Area Wetland of international importance (Ramsar)
Area (ha)	4838.94
<b>General site character</b>	
Tidal rivers. Estuaries. Mud flats. Sand flats. Lagoons (including saltwork basins) (57.3%) Salt marshes. Salt pastures. Salt steppes (1.5%) Shingle. Sea cliffs. Islets (0.9%) Inland water bodies (standing water, running water) (5.6%) Bogs. Marshes. Water fringed vegetation. Fens (3.7%) Dry grassland. Steppes (1.9%) Humid grassland. Mesophile grassland (29.1%)	
<b>Article 4.1 qualification under the Birds Directive (79/409/EEC)</b>	
Over winter the area regularly supports <i>Circus cyaneus</i> 1% of the population in Great Britain, Five year peak mean for 1993/94 to 1997/98, <i>Recurvirostra avosetta</i> (Western Europe/Western Mediterranean -breeding) 28.3% of the population in Great Britain Five year peak mean for 1993/93 to 1997/98	
<b>Article 4.2 qualification under the Birds Directive (79/409/EEC)</b>	
Over winter the area regularly supports <i>Calidris alpina alpina</i> , (Northern Siberia/Europe/Western Africa) 2.1% of the population Five year peak mean for 1993/94 to 1997/98 <i>Calidris canutus</i> , (North-eastern Canada/Greenland/Iceland/Northwestern Europe) 1.4% of the population Five year peak mean for 1993/94 to 1997/98 <i>Limosa limosa islandica</i> (Iceland - breeding) 2.4% of the population Five year peak mean for 1993/94 to 1997/98 <i>Pluvialis squatarola</i> , (Eastern Atlantic - wintering) 1.7% of the population Five year peak mean for 1993/94 to 1997/98 <i>Tringa totanus</i> (Eastern Atlantic - wintering) 2.2% of the population Five year peak mean for 1993/94 to 1997/98 On passage the area regularly supports waterfowl including	

<p><i>Charadrius hiaticula</i>, (Europe/Northern Africa - wintering) 2.6% of the population Five year peak mean for 1993/94 to 1997/98, <i>Circus cyaneus</i>, <i>Recurvirostra avosetta</i>,</p>
<p><b>Conservation Objectives</b></p>
<p>With regard to the Special Protection Area and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features' listed below), and subject to natural change; 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>

## Lee Valley

<b>Location Lee Valley Special Protection Area</b>	
Country	England
Unitary Authority	Hertfordshire (51%), Greater London (44%), Essex (5%)
Latitude	51 34 51 N
Longitude	00 02 58 W
Special Protection Area EU code	UK9012111
UK Ramsar Code	UK11034
Status	Special Protection Area Wetland of international importance (Ramsar)
Area (ha)	447.87
<b>General site character</b>	
Inland water bodies (standing water, running water) (97%) Bogs. Marshes. Water fringed vegetation. Fens (4%) Humid grassland. Mesophile grassland (8%) Improved grassland (10%) Broad-leaved deciduous woodland (10%) Other land (including towns, villages, roads, waste places, mines, industrial sites) (1%)	
<b>Article 4.1 qualification under the Birds Directive (79/409/EEC)</b>	
This site qualifies under <b>Article 4.1</b> of the Directive (79/409/EEC) by supporting populations of European importance of the following species listed on Annex I of the Directive:	
<b>Over winter;</b>	
Bittern <i>Botaurus stellaris</i> , 6 individuals representing at least 6.0% of the wintering population in Great Britain (5 year peak mean, 1992/3-1995/6)	
<b>Article 4.2 qualification under the Birds Directive (79/409/EEC)</b>	

This site also qualifies under **Article 4.2** of the Directive (79/409/EEC) by supporting populations of European importance of the following migratory species:

**Over winter;**

Gadwall *Anas strepera*, 515 individuals representing at least 1.7% of the wintering Northwestern Europe population (5 year peak mean 1991/2 - 1995/6)

Shoveler *Anas clypeata*, 748 individuals representing at least 1.9% of the wintering Northwestern/Central Europe population (5 year peak mean 1991/2 - 1995/6)

**Conservation Objectives**

With regard to the Special Protection Area and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features' listed below), and subject to natural change;

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 the habitats of the qualifying features
- The structure and function of the habitats of the qualifying features
- The supporting processes on which the habitats of the qualifying features rely
- The population of each of the qualifying features, and,
- The distribution of the qualifying features within the site.

## Annex 2 Consultation responses

<p><b>Environment Agency received 20 September 2024:</b></p>	<p>We have no further comments on the SEA or HRA.</p> <p>We have had to prioritise our limited resource and focus on strategic plans where the environmental risks and opportunities are highest. I have reattached our advice note which sets out our substantive response to Neighbourhood Plan consultations including Strategic Environmental Assessment screening and scoping.</p> <p><u>Contents of Advice Note:</u></p> <p>Neighbourhood Plans provide a unique opportunity to deliver enhancements to the natural environment at the local level. This document sets out the key environmental issues, within our remit, which should be considered. We have had to prioritise our limited resource and focus on strategic plans where the environmental risks and opportunities are highest. This advice note sets out our substantive response to Neighbourhood Plan consultations including Strategic Environmental Assessment screening and scoping. Together with Natural England, English Heritage and Forestry Commission we have published joint advice on neighbourhood planning which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at: <a href="https://neighbourhoodplanning.org/toolkits-and-guidance/consider-environment-neighbourhood-plans/">https://neighbourhoodplanning.org/toolkits-and-guidance/consider-environment-neighbourhood-plans/</a></p>
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Drawing up a neighbourhood plan is a fantastic opportunity to build community resilience to climate change and make the local natural environment better. Opportunities include:

- New green spaces and improvements to public space through new development. This could include planting trees, creating rainwater gardens or enhancing local waterways for water quality and biodiversity.
- Recognising the value of certain environmental features within a plan area, e.g. a floodplain, wetland habitat or rivers. Identify these features and outline how you intend to protect them and improve them.
- Helping a community to manage and adapt to the risk of flooding and climate change by incorporating natural features and green space to manage and store water, and supporting the use of sustainable drainage systems (SuDS).
- Promoting energy and water efficiency measures for new builds. These measures will reduce the cost of construction for developers and help to reduce utility bills for future occupiers. This will also help reduce unsustainable water consumption and carbon emissions.

We also recommend your Plan takes account of relevant Local Planning Authority's policies, plans and strategies including Local Planning Authority's Strategic Flood Risk Assessment, flood risk strategies (<https://www.gov.uk/government/collections/flood-risk-management-current-schemes-and-strategies> ), and the Thames River Basin Management Plan ([https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/289937/geth0910bswa-e-e.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/289937/geth0910bswa-e-e.pdf) ) as appropriate.

The information below explains the key issues we would consider in reviewing your Plan. We aim to reduce flood risk, while protecting and enhancing the water environment.

### **Infrastructure Delivery**

We recommend that environmental infrastructure, including habitat enhancements, water storage areas, and green space, is taken into account if the Plan looks to fund local infrastructure.

### **Flood risk**

**Development must be safe and should not increase the risk of flooding.**

Neighbourhood Plans should conform to national and local policies on flood risk:

If a Neighbourhood Plan is proposing sites for development please check whether there are any areas of Flood Zones 2 or 3 within the proposed site

allocations. You can view a site's flood zone on the Flood Map for Planning on our website: <https://flood-map-for-planning.service.gov.uk/>

If the proposed allocation is located within Flood Zone 2 or 3 you should consult the Flood Risk and Coastal Change pages of the National Planning Policy Guidance (NPPG):

<http://planningguidance.communities.gov.uk/blog/guidance/flood-risk-and-coastal-change/>

Here you can determine whether the flood risk vulnerability of the proposed development and the flood zone are compatible. In accordance with national planning policy the Sequential Test should be undertaken to ensure development is directed to the areas of lowest flood risk taking into account climate change. This should be informed by the Environment Agency's Flood Map for Planning and the Local Planning Authority's Strategic Flood Risk Assessment (SFRA), if they have one. We recommend you contact the Local Planning Authority to discuss this requirement further.

If the Neighbourhood Plan proposes development in flood risk areas, the Strategic Environmental Assessment should include baseline information about the flood risks, and include it as a key sustainability issue and as an objective.

We would have concerns if development is allocated in this high risk flood zone without the Sequential Test being undertaken. It is important that your Plan also considers whether the flood risk issues associated with these sites can be safely managed to ensure development can come forward.

We can provide any flooding information which we have available – such as predicted flood levels and historical flood data. Please note that there may be a charge for this information. Please contact our Customers and Engagement Team at [HNLenquiries@environment-agency.gov.uk](mailto:HNLenquiries@environment-agency.gov.uk) for further details. In addition to the above you should also check with the Local Planning Authority's Neighbourhood Planning team with regards to other sources of flooding (such as surface water, groundwater, sewers and historic flooding) as detailed in their Strategic Flood Risk Assessment (SFRA). The Lead Local Flood Authority (LLFA), now has responsibility for local flood risk management and may hold flooding information that is not identified on our Flood Map.

### **Climate Change Allowances**

The Local Authority's Strategic Flood Risk Assessment should indicate the extent of flood zones with likely climate change. On 19 February 2016, we published new guidance for planners and developers on how to use climate change allowances: <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

### **Flood Defences**

Areas of your Neighbourhood Plan area, or proposed sites, may be given protection by a flood defence/alleviation scheme. Where this is the case

the Plan should acknowledge this and identify the level of protection provided (including any climate change allowance). It should be noted that flood defences are intended to protect existing properties and are not to facilitate new development in areas that would otherwise be impacted by flooding. Any assessment of development behind flood defences should consider the impacts of a breach or overtopping. Where it is determined that new development should be behind a flood defence financial contributions may be sought to maintain or improve the structure.

### **Thames Estuary 2100 (Tidal Defences)**

In line with requirements set out in the Thames Estuary 2100 (TE2100) plan, developments in this location will need to demonstrate how the flood defence could be raised in the future to meet the demands of climate change.

No activities on site should preclude access to the flood defence from maintenance or prevent the future raising of flood defences. In some cases we hold technical drawings of flood defence structures which may be of use. To request these you should contact our Customers and Engagement Team at [hnl.enquiries@environment-agency.gov.uk](mailto:hnl.enquiries@environment-agency.gov.uk)

### **Ecology and Water Management**

#### **Proximity to watercourse/ Ecology**

Main rivers can be viewed on the Environment Agency's map:

<https://environment.maps.arcgis.com/apps/webappviewer/index.html?id=17cd53dfc524433980cc333726a56386>

The neighbourhood plan should draw upon evidence of designated or non-designated sites of nature conservation sites of international, national or local importance, and seek to ensure these sites are safeguarded and there is no degradation to these sites. The mitigation hierarchy of avoid mitigate and compensate should be followed to ensure this.

In accordance with national policy, any development proposal should avoid significant harm to biodiversity and seek to protect and enhance it; delivering biodiversity net gain. The forthcoming Environment Bill will mandate when enacted the demonstration of a minimum 10% biodiversity net gain using the Defra Biodiversity Metric 2.0 (or subsequent version), even where development proposals do not result in biodiversity loss. The Neighbourhood Plan could identify opportunities to incorporate requirements for achieving biodiversity and wider environmental net gains.

The provision of green infrastructure, particularly along rivers, can bring about benefits for people and wildlife. Creating networks of green space and habitats can also ensure wildlife are able to migrate and move across sites more easily enabling recovery and resilience of different wildlife species. The Neighbourhood Plan could play a role in helping to preserve, safeguard and establish green buffer zones along rivers by including policies or design guidance for their area. Even where buffer zones do not currently exist it is becoming more vital that we create them not just for the

benefit of biodiversity but to reduce flood risk and increase our resilience to climate change.

This is a key way in which we can carry out our legal duty to further and promote the ecological and landscape value of rivers and land associated with them. In urban areas, in particular, rivers have often been degraded by past development, and we expect that any new development should go some way to redress the balance.

Neighbourhood Plans provide an opportunity to promote river restoration and enhancements helping us all to achieve the targets to improve waterbodies as part of the Water Framework Directive (WFD). There should be no deterioration in water quality and development should bring about improvements to the ecological status of any water body. Local WFD catchment data for the rivers in your area can be obtained from: <http://environment.data.gov.uk/catchment-planning/RiverBasinDistrict/> . We have identified WFD action measures for specific locations or whole reaches of watercourse (e.g. river bank restoration, improving fish passage, etc) and can be obtained from [hnenquiries@environment-agency.gov.uk](mailto:hnenquiries@environment-agency.gov.uk) on request.

Objectives to achieve WFD improvements across all sectors are outlined in the Thames River Basin Management Plan (RBMP) (<https://www.gov.uk/search?q=River+Basin+Management+Plans> ).

An assessment of the potential impacts of the Neighbourhood Plan on watercourses under WFD should be included within the SEA/SA appraisal, making use of the datasets available above.

### **Groundwater Quality**

**Development must not cause pollution to the water environment.**

#### **Aquifers and Source Protection Zones**

Some of your local area, and specific potential site allocations, may be located upon or within aquifers and Source Protection Zones (link below). SPZ 1 is especially sensitive. You might consider these within your Plan and when allocating sites. The relevance of the designation and the potential implication upon development proposals should be seen with reference to our Groundwater Protection guidance:

<https://www.gov.uk/government/collections/groundwater-protection>

To see if a proposed development is located within a Source Protection Zone, please use our online map:

<https://www.gov.uk/guidance/groundwater-source-protection-zones-spzs>

### **Land Contamination**

You must consider land contamination when preparing your plan. Managing it during development is key to addressing past contamination and preventing further impacts during development.

You can establish if a site may be contaminated in several ways. Your Local Authority may hold a register of sites it knows to be contaminated. A



list of potentially contaminated sites can be accessed on the following link:  
<https://www.claire.co.uk/useful-government-legislation-and-guidance-by-country/76-key-documents/198-doe-industry-profiles>

We recommend you contact your Local Authority's Environmental Health team who may hold records on known/potential land contamination. Please note our primary concern is with regards to water quality. Your Local Authority's Environmental Health team will advise you on issues related to human health.

Your plan may include areas which are located on aquifers and Source Protection Zones. These areas represent the most sensitive and highest risk in terms of potential pollution to protected groundwater supplies, some of which are used for drinking water. These should be considered within your plan if growth or development is proposed here. Further information can be accessed on the following links:

*Guiding principles for the Land Contamination*

<https://www.claire.co.uk/useful-government-legislation-and-guidance-by-country/192-guiding-principles-for-land-contamination-gplc>

*Approach to Groundwater Protection:*

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/692989/Environment-Agency-approach-to-groundwater-protection.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/692989/Environment-Agency-approach-to-groundwater-protection.pdf)

### **Water supply and foul drainage**

When allocating sites in you Plan, you will need to consider if the water supply and foul drainage infrastructure can accommodate the development. Your local water company can provide further information about water supply and sewerage capacity. Our '[Water Stressed Areas – final classification](#)' 2013 explains that our area is seriously water stressed. This is particularly significant as population numbers rise and there are increased impacts from climate change on water resource availability and reliability. The Neighbourhood Plan should consider what further measures could help the local area achieve water sustainability that are not already in the Local Plan, water efficiency standards and measures including the retrofitting of existing buildings.

### **Surface water drainage**

The inclusion of Sustainable Drainage Systems (SUDS) should always be a consideration within any development to reduce the risk of surface water flooding on and off site. The Lead Local Flood Authority, is the main contact for SUDS issues. However, we have interest in SUDS from a groundwater protection perspective and improving water quality.

The collection and dispersal of clean surface water to ground to recharge aquifer units and prevent localised drainage or surface systems flooding in heavy rainfall is encouraged. However, dispersal into the ground through soakaways or other infiltration systems requires a site-specific investigation and risk assessment. Generally, we would accept roof

	<p>drainage going to soakaway (or other systems), but other surface drainage may need to go through treatment systems or to foul main, for instance vehicle parking. Infiltrating water has the potential to cause mobilisation of contaminants present in shallow soil/made ground which could ultimately cause pollution of underlying groundwater resources. Where contamination is known or suspected, remedial or other mitigating measures will likely be required so that it can be demonstrated that there is no resultant unacceptable risk to Controlled Waters.</p> <p>We advise applicants to follow our guidance – Groundwater Protection. This is a report that highlights the importance of groundwater and encourages industry and other organisations to act responsibly and improve their practices. This can be found at:  <a href="https://www.gov.uk/government/collections/groundwater-protection">https://www.gov.uk/government/collections/groundwater-protection</a></p> <p>The design of the drainage systems should be in line with G1, G9, G12 and G13 position statements:  <a href="https://www.gov.uk/government/publications/groundwater-protection-position-statements">https://www.gov.uk/government/publications/groundwater-protection-position-statements</a></p> <p><b>Please note</b></p> <p>This document is a response to a Neighbourhood Plan consultation and does not represent our final view in relation to any future planning application made in relation to any site. You should seek your own expert advice in relation to technical matters relevant to your neighbourhood plan before submission.</p> <p>If you have any questions please contact the Hertfordshire and North London Sustainable Places team: <a href="mailto:HNL.SustainablePlaces@environment-agency.gov.uk">HNL.SustainablePlaces@environment-agency.gov.uk</a></p>
<p><b>Historic England received 9<sup>th</sup> August 2024:</b></p>	<p>Thank you for consulting Historic England in respect of the SEA Screening Opinion for the St James's Neighbourhood Plan.</p> <p>As the Government's adviser on all matters pertaining to the historic environment and a consultation body for the purposes of Regulation 10(4) of the Town and Country (Environmental Impact Assessment) (England and Wales) Regulations 1999 ("the EIA Regulations"), Historic England writes to inform the City of Westminster's Scoping Opinion for the proposed neighbourhood plan for St James's.</p> <p>On the basis of this information provided we agree with the Council's assessment that strategic environmental assessment is not required, as set out under the criteria specified in Schedule 1 of the SEA regulations.</p> <p>It must be noted that this advice does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this request and which may have adverse effects on the environment. We trust this advice is of assistance in the preparation of your scoping opinion.</p>

<p><b>Natural England received 23 August 2024:</b></p>	<p>Thank you for your consultation on the above dated and received by Natural England on 1 August 2024.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p><b>Screening Request: Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA)</b></p> <p><b>It is Natural England's advice, on the basis of the material supplied with the consultation, that:</b></p> <ul style="list-style-type: none"><li>• <b>significant effects on statutorily designated nature conservation sites or landscapes are unlikely; and,</b></li><li>• <b>significant effects on Habitats sites<sup>1</sup>, either alone or in combination, are unlikely.</b></li></ul> <p>The proposed neighbourhood plan is unlikely to significantly affect any Site of Special Scientific Interest (SSSI), Marine Conservation Zone (MCZ), Special Areas of Conservation (SAC), Special Protection areas (SPA), Ramsar wetland or sites in the process of becoming SACs or SPAs ('candidate SACs', 'possible SACs', 'potential SPAs') or a Ramsar wetland. The plan area is unlikely to have a significant effect on a National Park, Area of Outstanding Natural Beauty or Heritage Coast, and is unlikely to impact upon the purposes for which these areas are designated or defined.</p> <p>Guidance on the assessment of Neighbourhood Plans, in line with the Environmental Assessment of Plans and Programmes Regulations 2004 is contained within the Planning Practice Guidance. This identifies three triggers that may require the production of an SEA:</p> <ul style="list-style-type: none"><li>• a neighbourhood plan allocates sites for development</li><li>• the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan</li><li>• 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.</li></ul> <p>Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require an SEA. Further information is included in Natural England's standing advice on protected species.</p> <p>Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and</p>
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best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant an SEA. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission standing advice.

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a SEA is necessary.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If a SEA is required, Natural England must be consulted at the scoping and environmental report stages.