Dear Lysanne,

DRAFT HACKBRIDGE & BEDDINGTON CORNER NEIGHBOURHOOD PLAN – STRATEGIC ENVIRONMENT ASSESSMENT (SEA) SCREENING OPINION

In line with the SEA Regulations 2004, the pre-submission ‘Draft Hackbridge & Beddington Corner Neighbourhood Plan 2017-27’ was submitted to the London Borough of Sutton on 18 January 2017 by the Hackbridge & Beddington Corner Neighbourhood Development Group for a screening opinion. As you are aware, the purpose of screening is to determine whether the submission draft of the neighbourhood plan is likely to have ‘significant effects on the environment’ and therefore needs to be accompanied by a strategic environmental assessment (SEA).

At the same time as SEA screening, there is also a need to determine whether an ‘Appropriate Assessment’ needs to be undertaken under EU Directive 92/43/EEC ‘on the conservation of natural habitats and of wild fauna and flora’ (the Habitats Directive). Under the Directive, an Appropriate Assessment must be undertaken if the plan in question is likely to have a ‘significant effect’ on a European protected wildlife site.

In line with the Regulations and procedures set out in the Government’s ‘Toolkit for Neighbourhood Planners - Screening neighbourhood plans for strategic environmental assessment’ (June 2016), there is a requirement upon local planning authorities to reach a screening opinion in consultation with the following statutory consultation bodies:

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

A letter was therefore sent to each of the above bodies on 2 March 2017, inviting them to comment within the 5-week period prescribed by the Regulations. Responses were subsequently received from Natural England and Historic England on 17 and 23 March 2017 respectively and these were taken into account by the Council in reaching its final screening opinion. Both respondents considered that the plan was unlikely to have ‘significant environmental effects’ and would therefore not require an SEA to be undertaken. However, no response has been received from the Environment Agency to date.
While Historic England supported the Council’s view that a full SEA should not be required, it sought to highlight the high archaeological potential within the neighbourhood area, notably the Wandle Gravels Archaeological Priority Area (APA) which has the possibility of being assessed as being of Tier 1 quality (nationally important). While proposals such as groundwater boreholes could impact upon archaeology, it may be the case that they would not cause ‘significant environmental effects’, such that would require SEA. However, Historic England considers that this will be largely dependent upon proposed locations on a case by case basis. Historic England have therefore advised the Neighbourhood Development Group to contact the Greater London Archaeology Advisory Service for further advice (contact Mark Stevenson mark.stevenson@historicengland.org.uk).

The Council’s full SEA Screening opinion on the Draft Hackbridge & Beddington Corner Neighbourhood Plan 2017-27 is set out in Annex 1 to this letter. In summary, the Council considers that a full SEA is not required and that consequently an Environmental Statement (ES) does not need to be prepared for submission to the Council alongside the Draft Hackbridge and Beddington Corner Neighbourhood Development Plan. The Council has also reached the view that there will be no significant effects on a European protected wildlife site and therefore an Appropriate Assessment does not need to be undertaken (Annex 2). Responses received from each of the statutory consultation bodies are reproduced in full as Annex 3.

A copy of this SEA screening opinion and consultation responses can be accessed or downloaded from the Council’s public register on the Sutton website at https://drive.google.com/drive/folders/0B19JvLvJMV1RRGpYb1N4QlRVVjA.

Please don’t hesitate to get back to me on 020 8770 6297 if there are any further issues arising.

Yours sincerely,

Patrick Whitter
Senior Planner
LB Sutton x6297

SIMON LATHAM
Executive Head of Economic Development, Planning and Sustainability

Chief Executive –
Niall Bolger

Strategic Director –
Mary Morrissey
(1) Introduction
In line with the SEA Regulations 2004, the pre-submission ‘Hackbridge & Beddington Corner Neighbourhood Draft Plan 2017-27’ was submitted to the London Borough of Sutton on 18 January 2017 by the Hackbridge & Beddington Corner Neighbourhood Development Group for a screening opinion. The purpose of screening is to determine whether the submission draft of the neighbourhood plan is likely to have ‘significant effects on the environment’ and therefore needs to be accompanied by a strategic environmental assessment (SEA).

There is also a need to determine whether an ‘Appropriate Assessment’ needs to be undertaken under EU Directive 92/43/EEC ‘on the conservation of natural habitats and of wild fauna and flora’, (the Habitats Directive). Under the Directive, an Appropriate Assessment must be undertaken if the plan in question is likely to have a ‘significant effect’ on a European protected wildlife site.

This document sets out the outcome of both SEA and Habitats Directive screening and the reasons underlying the Council’s opinion based on the criteria set out in Schedule 1 of the SEA Regulations and best practice guidelines set out in ‘Screening neighbourhood plans for SEA - A toolkit for neighbourhood planners’ published on the CLG-sponsored ‘My Community’ website in June 2016 (The Habitats Directive screening results are included as an Annex).

(2) Background to the SEA Regulations
The EU ‘Strategic Environmental Assessment Directive (2001/42/EC) seeks to provide a high level of protection of the environment by integrating environmental considerations into the process of preparing certain plans and programmes. The aim of the Directive is “to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development, by ensuring that, in accordance with this Directive, an environmental assessment is carried out of certain plans and programmes which are likely to have significant effects on the environment.”

The SEA Directive is implemented in the UK through the ‘Environmental Assessment of Plans and Programmes Regulations 2004’ (SEA Regulations). In the case of Local Plans, SEA should be addressed as an integral part of the sustainability appraisal (SA) process where one is required. SA of the type that is legally required for development plan documents is not required for neighbourhood development plans. This is because they are not ‘Local Plans’, or development plan documents as defined by the Planning and Compulsory Purchase Act 2004. Neighbourhood development plans - even where they have been ‘made’ by a local planning authority following a successful referendum - have their own designation under the Localism Act. This does not mean however that neighbourhood development plans should have any less status in terms of decision-making.

Although SA is not required, a neighbourhood development plan may require SEA under the SEA Regulations depending on the characteristics of the plan, potentially significant environmental effects and the area likely to be affected (see below). The local planning authority (in this case the London Borough of Sutton) is required to undertake SEA screening and publish a screening opinion.

(3) Screening of Neighbourhood Development Plans
When determining whether a neighbourhood plan requires SEA, the SEA Regulations require that the criteria set out in Schedule 1 of the SEA Regulations be considered. These are the criteria “for determining the likely significance of effects on the environment”. These criteria are split into two categories: those relating to the characteristics of the plan and those to the characteristics of the effects and area likely to be affected. These are set out below:
Plan characteristics

- 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;
- the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;
- the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;
- environmental problems relevant to the plan or programme;
- the relevance of the plan or programme for the implementation of [European] Community legislation on the environment (for example, plans and programmes linked to waste management or water protection).

Effects and area characteristics

- the probability, duration, frequency and reversibility of the effects
- the cumulative nature of the effects
- the transboundary nature of the effects
- the risks to human health or the environment (for example, due to accidents);
- the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);
- the value and vulnerability of the area likely to be affected due to
  - special natural characteristics or cultural heritage;
  - exceeded environmental quality standards or limit values;
  - intensive land-use
- the effects on areas or landscapes which have a recognised national, Community or international protection status.

The following 'sensitive areas' are identified in the EIA Regulations, comprising: Natura 2000 sites; Sites of Special Scientific Interest (SSSIs); National Parks; Areas of Outstanding Natural Beauty; World Heritage Sites; and Scheduled Ancient Monuments. However, a range of other sensitive locations, features and areas can also be considered in the screening process, including locally designated nature conservation sites, Local Nature Reserves, Areas of high archaeological potential, locations where air quality is monitored due to potential exceedances of national air quality objectives and areas with surface water flooding issues.

Neighbourhood development plans should be screened as soon as there is sufficient information available to consider whether the proposed content of the plan or its likely intent (e.g. will it allocate development sites or not?) are likely to lead to significant effects. According to Government guidance, SEA is more likely to be necessary if:

- a neighbourhood plan allocates sites for development (for housing, employment etc.) that haven’t already been appraised through the SA of the relevant Local Plan;
- the neighbourhood plan area contains sensitive environmental assets that may be affected by the policies and proposals in the neighbourhood plan; and
- the neighbourhood plan is likely to have significant environmental effects not already addressed through the sustainability appraisal of the relevant Local Plan.

(4) Screening against the Habitats Directive (Appropriate Assessment)

Under the Habitats Directive (92/43/EEC) ‘on the conservation of natural habitats and of wild fauna and flora’, an Appropriate Assessment must be undertaken if the plan in question is likely to have a significant effect on a European protected wildlife site i.e. where policies and proposals in the plan might impact on one or more European sites. If Appropriate Assessment is required following Habitats Directive screening, the Directive the plan in question should also be subjected to a full SEA.

(5) Summary of Draft Hackbridge & Beddington Corner Neighbourhood Plan

The key objectives, policies and proposals put forward in the pre-submission ‘Draft Hackbridge & Beddington Corner Neighbourhood Plan’ are set out below as the basis for the screening process (see ‘Plan Characteristics’ above). The full version of the plan can be viewed or downloaded from the Neighbourhood Development Group website at https://hackbridgendg.com/plan/
Hackbridge and Beddington Corner aspire to be one of the most sustainable suburbs in the UK. It will be recognised as a distinctive community with an appealing identity at the heart of the Wandle Valley Regional Park. Hackbridge will:

- meet the future needs of its community through well designed, and well located, development and public spaces, and by retaining and managing its historic assets in active use
- be known for the strength of its local economy and its community focused and environmental businesses
- provide an appealing environment in which to walk and cycle, with effective connections between its different residential areas and across major roads and the railway
- extend the benefits of the Wandle Valley Regional Park throughout its area via characteristic planting, open spaces and green corridors which connect to the River Wandle
- construct and manage buildings to make zero carbon living the norm; and
- establish Hackbridge Corner as the heart of the neighbourhood, providing a vibrant community hub, appealing public realm and strong and locally distinctive economy.

**OBJECTIVES AND POLICIES**

*Housing & Built Environment (Section 5 Pages 32-36)*

**Objective 1.1: Strengthen the character of our neighbourhood and deliver sustainability best practice**

**Objective 1.2: Create a better pedestrian environment and public realm experience**

**Policy H&BEP1: Local character and sense of place**
All development shall make a positive contribution to the character of Hackbridge and Beddington Corner. Proposals shall:
- respect the scale and density of the suburban setting of the neighbourhood’s buildings, areas of special local character and other heritage assets
- use innovative solutions to achieve good quality design and reduce the environmental impact of the development
- adopt design principles which maximise access to natural light
- maximise access to green spaces and for high density developments, use green walls and roofs to achieve this (see Policy EP7 – Climate Change Mitigation)
- improve the character and quality of the public realm, including through public art and use of colour
- utilise locally sourced materials where possible; and
- demonstrate how they have addressed these requirements in the details provided with a planning application

**Policy H&BEP2: Sustainable design for Sustainable living**

**Cycle storage**
- residential development schemes should exceed the minimum cycle standards in the Site Development Policies DPD
- should be of sufficient size for the anticipated number of occupants of the dwelling
- allocated inside and in a separate room or cupboard adjacent to the main entrance as a presumption
- in flatted developments should be located adjacent to the main entrance of the block as a separate room inside, with access directly off the main entrance lobby at ground floor level, in accordance with Secured by Design guidance
- developments providing cycle storage with direct outside access to public domain will be supported Recycling facilities;
- provide space for segregated bins for waste located within the kitchen;
- provide composting bins or wormeries for all new dwellings with garden;
- provide onsite communal facilities for items not recycled as part of the standard service, i.e. shoes, clothes etc.

**Outdoor drying**
- provide screened secure area for outdoor drying of clothes

**Allotments**
- residential development schemes will be expected to provide space for residents to grow food
- should be located in individual garden spaces or communal spaces
- should include some raised garden beds to enable people with limited physical mobility to join in;
- should be located in spaces that face south, south/east or south/west;
- In flatted developments this could include roof gardens;
- all existing allotments in Hackbridge are to be protected and retained for use as allotments

**Objective 1.3: Encourage sociability through design of the built environment**

**Policy H&BEP3 Design for sociability**
All development proposals shall demonstrate that the design will encourage sociability and community interaction by:
- designing spaces between and around buildings to encourage activities such as children’s play and interaction between neighbours; and
- creating spaces through natural landscaping enhancements to the green infrastructure
• creating a positive relationship between the buildings and open space, particularly; green spaces; the River Wandle; and key routes of movement such as the railway bridges
• ensuring green space is commensurate with the size and type of development
• ensuring developments address or improve connectivity to adjacent existing residential estates/areas
• ensuring new streets are permeable and well connected to the existing network
• designing attractive streets that meet the needs of all users, giving priority consideration to pedestrians and cyclists
• providing a safe cycling network; and
• providing places which encourage community interaction, such as outside seating

Where a Design and Access Statement is required this shall demonstrate how the development meets the requirements of this policy

**Objective 1.4: Meet changing housing needs of our neighbourhood**

Policy H&BEP4 - Housing needs for Hackbridge residents
All residential development proposals will be expected to:
• prioritise meeting local needs, particularly for affordable and family housing; and
• demonstrate how it has considered the opportunities provided by community-led housing projects.

**Local Economy (Section 5 Pages 37-40)**

**Objective 2.1: Protect and support existing employment land use**

Policy LEP1 - Employment land
The existing and proposed employment sites shall not be lost.
• Business Forest within the new Felnex development (New Mill Quarter);
• Island site for Wandle Valley Trading Estate (Riverside);
• Restmor Way; and
• Land North of Hackbridge Train Station.

**Objective 2.2: Improve opportunities for employment**

Policy LEP2 - Employment opportunities in Hackbridge
All employment development proposals should consider and provide the following:
• Encourage business opportunities that cater for visitors to the Wandle Valley Regional Park;
• Flexible spaces for new start up enterprises enabling employment opportunities for training and apprenticeships.

Policy LEP3 Employment opportunities – Hackbridge Railway Station car park and adjacent land
All development proposals should provide the following:
• All land retained for employment purposes, mitigating the loss of opportunity for employment across Hackbridge.

**ENVIRONMENT (Section 5 pages 41-53)**

**Objective 3.1: Develop Hackbridge as a major gateway to the Wandle Valley Regional Park (WVRP)**

**Objective 3.2: Develop a new visitors centre as part of the gateway to the WVRP**

Policy EP1 - Access to Wandle Valley Regional Park (WVRP)
Hackbridge sits in the middle of the Wandle Valley Regional Park and thereby all development proposals shall be required to support improved access including:
• Major development proposals within the WVRP should ensure easy access to the green spaces.
• Consider the needs of people with disabilities (DDA compliant), children and older residents to enable independent exploration of the park.
• Retention, development and provision of public access to Beddington Farmlands and the wider WVRP. Please refer to Policy CIP1 which covers safeguarding and enhancing heritage assets.

Proposals for Open Green Spaces (Map 6)
Green corridors, access points to the Wandle Valley Regional Park and a possible Ecology Park included in Local masterplan of open green spaces in Map 6.

**Objective 3.3: Protecting/safeguard/ Improve and open up public access to existing green spaces, including MOL for the benefit of the people and wildlife.**

Policy EP2 – Local Green Space Designation
‘Local Green Spaces’ in accordance with the NPPF paragraph 76-78 should only be used:
• Where the green space is in reasonably close proximity to the community it serves;
Where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and

Where the green area concerned is local in character and is not an extensive tract of land.

The following green spaces in Hackbridge and Beddington Corner meet these criteria:-

- Hackbridge Green
- Field within BedZED.

Proposals for local designation of Green Spaces

See proposed Green spaces for local designation in Map 7, including: Spencer Road Wetlands; Field north of BedZED (MOL); Watercress Park; Hackbridge Green; Days & Son (MOL); Field within BedZED; Verges (London Road); Mill Green (River Wandle); Mill Green (MOL); All Saints Church grounds Orchard Avenue Rec River Wandle; The Hack-Bridge

Objective 3.4: Manage green spaces for the benefit of people and wildlife

Policy EP3 - Trees

Development should protect trees in good health that add to the quality and character of the area. It also reduces flood risk. The equivalent number of new trees should be planted to replace any taken down using 'right plant, right place' principle. Trees need to be commensurate to the development. Large canopied trees will be looked upon more favourably. All new planting needs adequate provision for ongoing maintenance.

Policy EP4 - Management of current public green spaces

Public green spaces should be protected and enhanced in line with the aspirations of the WVRP. The primary objective should be to increase biodiversity and improve leisure opportunities.

Policy EP5 - Management of new public green spaces

As new developments are brought online integration into the existing green space should be seen as paramount. To assist developers and Council Officers a green space management guideline is detailed below.

The need for well managed public green spaces is important as an improved and expanded green infrastructure has great benefits to wildlife and society.

The management of new green spaces in Hackbridge and Beddington Corner shall adhere to the following guidelines:

- Take the spirit of the locality into consideration. ‘Bringing the Wandle Valley Regional Park into Hackbridge’.
- Take the growing history of lavender, mint and watercress into new design concepts.
- We would support proposed developments which clearly demonstrate multifunctional landscaping, utilising a mixture of native and non-native species of plants, to create and enhance wildlife opportunities, as well as providing aesthetic and landscape appeal.
- Provide areas to ‘grow your own’ in new developments both for houses and flats.
- Use recognised planting and management guidelines to increase habitat and plants that can cope with the change in climate, i.e. soggy, mild winters and dry, hot summers.

This approach as recommended by Natural England is documented in Section 41 of the Natural Environment and Rural Communities Act 2006. Various non-government organisations have provided planning aids for the implementation of this action, which include:


- Creating and managing flower-rich grassland in parks and green spaces;
- Formal and informal grass;
- House sparrows;
- Wildlife seed mixes for parks and gardens Bat Conversation Trust – www.bats.org.uk British Trust for Ornithology - www.bto.org

- Managing habitat for birds and other wildlife in urban green spaces Butterfly Conservation - www.butterflyconservation.org

- Guide for managing urban habitats for butterflies Buglife - www.buglife.org.uk
- Managing priority habitats for invertebrates Plantlife - www.plantlife.org.uk
- See appendix 8 for lists of recommended plants
- Use roof space of new developments to create either roof gardens, green roofs or water harvesting
- Give sufficient space for off street car parking (using SUDS) so front gardens are not paved over, exacerbating the issue of flood water run off
- Provide mixed hedges instead of fences to continue the green corridors within gardens and public spaces, which will increase biodiversity and help with storm water run off
- Use green walls to enhance blank canvases and extend the green corridors
- Use different mowing techniques to increase biodiversity and aesthetic quality, i.e. mowing in paths instead of completely mowing an area flat;
- Use newer initiatives of Bioswales and rain gardens to help cope with flash flooding
- All green spaces currently managed by Sutton Council, should consult with the NDG, to ensure that it conforms with the local green space management plan (see appendix 7)
Objective 3.5: Develop and improve green links/corridors

Policy EP6 - Green Infrastructure
All development shall be required to extend the biodiversity and amenity value of surrounding open spaces through the neighbourhood via new and enhanced green infrastructure linkages through onsite measures. This shall include:

- provision of three principal green corridors improving west-east links between the River Wandle and Mitcham Common/Beddington Farmlands sections of the proposed Wandle Valley Regional Park.
- additional measures will be used to improve north-south links along the River Wandle and London Road (refer to map 8)

This policy applies to all development within or adjacent to existing or new green corridors where it shall be integral to their design and implementation.

Green Infrastructure Proposals (Map 8, page 50)
See current, future and proposed green corridors together with ‘Blue Ribbon’ (the Wandle corridor) and the Railway Corridor (green chain) set out on Map 8 ‘Proposals for green Corridors’.

Objective 3.6: Minimise climate change through soft landscaping

Policy EP7 - Climate change mitigation
Development proposals are encouraged to use soft landscaping in an innovative way to combat climate change. Policies EP8 & EP9 focus more on the water elements.

- In an urban environment, landscape should be multifunctional, with clever design providing the ability to grow food as well as increase biodiversity and mitigate flooding.
- Installing green roofs and green walls improves the thermal efficiency of buildings and reduces the use of conventional heating and cooling systems, whilst also alleviating flood risk. They also contribute to the wider landscape character and increase biodiversity by providing wildlife habitats.
- Minimise the paving over of front gardens as this adds to storm water runoff and use SUDs. (See EP9 for further detail)
- Replacing fencing with hedges not only increases habitat, but also helps to soak up rain.
- Increase large canopy tree planting to help cool the climate and produce oxygen (see EP3 for further detail).

Policy EP8 – Rainwater harvesting
All residential or non-residential development should seek to achieve further reductions in mains water use by giving consideration to the following rainwater harvesting measures from the earliest stages of project planning and design:

- incorporating appropriate rainwater harvesting measures in all developments where feasible e.g. water butts;
- using rainwater harvesting measures for watering gardens, topping up ponds or maintaining wetland habitat, using automatic drip irrigation systems that provide regular watering as required;
- using reclaimed and recycled water (grey water recycling) for other non-potable uses such as for flushing toilets, car washing, cleaning large surfaces and water recovery systems for high water consuming activities e.g. swimming pools;
- using groundwater from boreholes for closed loop cooling and heating systems; and;
- taking particular care with the siting and design of rainwater collection measures in relation to historic buildings.

Policy EP9 - Water efficient landscape design
Developers should seek to maintain sufficient water supplies under drought conditions while reducing flood risks during heavy rainfall by providing detailed flood storage and drought resilience measures from the earliest stages of project planning and design, including sustainable urban drainage (‘SUDS’), bioswales, rain gardens etc.:

- maintaining or restoring natural floodplains and maximising the flood storage role of rivers, watercourses, ponds, aquifers and other water features;
- promoting the benefits of measures SUDS for water storage and groundwater recharge, thus increasing soil moisture levels for vegetation, sustaining evaporative cooling and reducing flood risks. Surface water run-off should be directed back to the watercourse rather than to the foul water drainage system; and
- reducing demand for irrigation by working with existing natural vegetation on site and using drought resistant planting to create public and private landscapes that are more resilient to higher summer temperatures. Low water use gardens and landscapes can be achieved by imitating the conditions and attributes of London’s vegetated brownfield sites or by working with the existing natural vegetation;
- ensuring that proposed water features such as fountains operate ‘closed systems’ in order to recycle the water; and;
- considering the cleaning needs of large surfaces, as this could result in significant water use.

Energy, Waste Water (Section 5 pages 53)

Objective 4.1: All new buildings to consider future issues such as climate change and fuel poverty.

Policy EW&WWP1 - Better buildings for the future
All new developments are to minimize, as far as possible, energy and water consumption and waste produced by the occupied buildings. To confirm how this will be achieved, a One Planet Action Plan is to be carried out and submitted with the planning application.
MOVEMENT (Section 5 pages 54-62)

Objective 5.1 Reduce the impact of London Road as a divisive barrier across the community

Objective 5.2 Increase proportion of journeys by cycle and on foot and improve access and links for pedestrians and cyclists throughout Hackbridge and Beddington Corner

Policy MP1 - Pedestrian and cycle networks
Developers and public bodies will be expected to invest in the development of new networks of pedestrian paths and cycle routes facilitating:
- The designing of schemes that connect to existing networks and provide pedestrian and cycle linkages between schemes and surrounding roads, residential areas, and when in close proximity, to the River Wandle and the Wandle Valley Regional Park;
- The encouragement of walking, and other modes of transport to reduce emissions from road vehicles;
- Improvement in east-west movement, wherever possible, for pedestrians and cyclists in the neighbourhood area to the River Wandle, Wandle Valley Regional Park and across London Road;
- The provision of secure and safe ‘parking’ for bicycles within the public realm of new developments;
- The provision of appropriate signage to footpaths and cycle ways within developments.

Proposals
Proposed cycle and walking route improvements.
- Mitcham Common & Beddington Park Cycle & Pedestrian Path:
- Cycle Route through Felnex Development:
- Permissive path extension:
- Crossings and paths at the Goat:
- Pedestrian footpath improvements
- Address safety and ease of movement for cyclists

Objective 5.3 Ensure that air quality and the impact of this on the health of residents is improved to EU ambient air quality directives standards. See Appendix 10 for the EU Ambient Air Quality Directives Standards.

Objective 5.4 Improve and promote the use of public transport for the benefit of residents

Objective 5.5 Seek to reduce the impact of car parking across Hackbridge and Beddington Corner

Policy MP2 - Transport
All development proposals must demonstrate how development across Hackbridge will integrate with existing transport infrastructure, specifically:
- Developers will be expected to demonstrate through road modelling whether their plans will exacerbate existing bottlenecks, especially roads approaching Hackbridge Corner. They may also suggest mitigation measures.
- Train / bus overcrowding.
- Parking for new and existing residents.

Policy MP3 - Air quality
Air quality needs to be monitored in Hackbridge for the reassurance of future and existing residents. Air quality and noise reports will be required for all new development proposals (including conversions and sub-divisions) adjacent to the following transport corridors:-
- London Road A237
- Hackbridge Road B277
- Goat Road
In the event that an adverse impact on amenity is identified, proposals will only be supported if appropriate mitigation can be provided e.g. soft landscaping in the form of large canopy trees and limited development of single aspect accommodation.

Policy MP4 - Car clubs and electric cars
All developments of more than 10 dwellings will be required to provide designated space(s) for car club cars and provide charging points for electric vehicles.

COMMUNITY INFRASTRUCTURE (Section 5 Pages 63-65)

Objective 6.1: Improve community infrastructure provision, which meets local needs, facilitated through CIL monies as appropriate

Objective 6.2: Retain and conserve the historic environment and heritage assets

Policy CIP1 - Community Infrastructure
All development in Hackbridge will be supported where evidence is provided to demonstrate the following:-
How it contributes to the maintenance and enhancements of existing local services
Safeguard and enhance heritage assets and areas of special local character
Protect and maintain access across bridges

Policy CIP2 - Community Infrastructure Levy (CIL)
Neighbourhood plans receive 15% of CIL and 25% once their plan is adopted. A process needs to be set up to ensure any money received from developers in the Hackbridge & Beddington Corner neighbourhood boundary is spent in this area with the approval of the community.

HACKBRIDGE COMMUNITY ACTION PLAN (Section 6 pages 66-70)

Proposed Neighbourhood Projects
- Identification and retention of heritage assets;
- Redesign corner of Hackbridge Green;
- Green audit;
- Installation of air pollution monitoring;
- Edible bus stops;
- Controlled parking zone;
- Community-led Housing;
- Development;
- Green Business and Green Business Network;
- Community Shops;
- Local Supply Chains;
- Local Employment;
- Retrofitting;
- Environmental Behaviour Change;
- Healthy Hackbridge and Beddington Corner;

(6) Baseline Data on Environmental Constraints and Assets
Best practice guidance on SEA screening emphasises the importance of gathering baseline data on environmental constraints and assets within the plan area to enable the likely significant effects (positive and/or negative) to be evaluated and their ‘significance’.

The Council believes that the draft Hackbridge & Beddington Corner Neighbourhood Development Plan have been prepared on a sound local evidence base, meaning that the policies and proposals put forward in the plan have been developed in the light of all available sources of social, economic and environmental information. While much of the relevant spatial information on prevailing environmental constraints and assets within the Hackbridge area is contained within the plan itself or in the accompanying Appendices (mostly based on detailed studies commissioned by the Neighbourhood Development Group), it is important to recognise that the Hackbridge area is also addressed by a range of Borough studies commissioned by the Council as part of Sutton’s Local Plan evidence base, comprehensive evidence gathering work undertaken as part of the preparation of the sustainability appraisal (SA) of the emerging Local Plan and in the preparation of the Authority Monitoring Report (AMR) 2015-16 and beyond.

While it is not desirable or feasible to duplicate the local evidence base for the Hackbridge and Beddington Corner area as part of this screening opinion, the main sources of available baseline information are listed below:

Draft Hackbridge Masterplan 2009
- the Draft Hackbridge Masterplan prepared by Tibbalds consultants on behalf of the Council in 2009 contained a comprehensive local evidence base which has been updated for the purpose of preparing the draft neighbourhood plan

Draft Hackbridge & Beddington Corner Neighbourhood Development Plan 2017

Section 2: A Place Called Hackbridge
- An overview of the local context and history of Hackbridge in terms of its location within the Borough and in relation to the Wandle Valley Regional Park (WVRP); key land-uses; housing stock, the area’s industrial heritage, transport infrastructure, population and recent developments including BedZED;
- a development sites map showing key development sites (Wandle Valley Trading Estate, Corbett Close, Felnex and Nightingale Close) and land uses (residential, employment, retail, schools, open space, allotments, Metropolitan Open Land (MOL) and the River Wandle) (Map 2);
Section 3: Our Neighbourhood Plan
- local information arising from engagement with a number of developers who had either submitted a planning application or who were in the early stages of drawing up pre-submission material for planned developments in Hackbridge (e.g. proposals for the redevelopment of the 2 Council-owned housing estates at Corbett Close and Nightingale Close and for the Wandle Valley Trading Estate);
- identification of the following ‘challenges and opportunities’ faced by Hackbridge based on feedback from the local community (listed in detail in Para 3.10)
  - many of the existing housing estates are isolated from each other;
  - lack of joined up ‘greenness’ in the heart and across the neighbourhood of Hackbridge;
  - our housing needs are not being met;
  - protect and preserve the suburban character of our neighbourhood;
  - lack of public places for people to interact in Hackbridge;
  - poor design of new building;
  - retain employment land as currently designated;
  - need to promote local employment;
  - support the role of the local centre;
  - foster new business and trade within Hackbridge;
  - promote community-run shops and other local social enterprises, and local supply chains;
  - recognise the existing ecological and biodiversity importance of our neighbourhood in the context of the ‘unfolding’ WVRP;
  - integration of our neighbourhood to its green environment;
  - protect and enhance Metropolitan Open Land in Hackbridge & Beddington Corner;

- Map of Current Green Spaces (Map 3);

Section 5: Our Neighbourhood Plan – Housing and Built Environment Policies
- Housing Needs Assessment for Hackbridge & Beddington Corner (AECOM on behalf of the NDG);
  - population and households;
  - average household income;
  - average market price;
  - housing supply and affordable housing;
  - proportion of social rented, shared ownership and privately owned dwellings;
  - proportion of flats verses family units

Section 5: Our Neighbourhood Plan – Local Economy Policies
- review of businesses operating within the area (business parks, retail and other);
- existing employment sites within Hackbridge (referred to as ‘Established Industrial Areas’ in the Local Plan);
- detailed review of land uses and opportunities at Hackbridge Station, adjacent buildings and the land north of Hackbridge Station

Section 5: Our Neighbourhood Plan – Environment Policies
- map of All London Green Grid (Map 4);
- map of Wandle Valley Regional Park (Map 5);
- identification of areas of high ecological importance within or adjacent to the neighbourhood area: Beddington Farmlands, Spencer Road Wetlands, Local Nature Reserve, Wilderness Island Local Nature Reserve, Watercress Park, Wandle Park, Mill Green, Orchard Rec, Hackbridge Green, Medland Close and the River Wandle;
- Local masterplan of open green spaces with location of possible ecology park, the ‘unfolding’ Wandle Valley Regional Park, access points to the Wandle Valley Regional Park, green corridors and the location of the new primary school (Map 6);
- Map of green spaces for ‘local designation’ identifying Hackbridge Green and the Field within BedZED as meeting the NPPF criteria for local designation (Map 7);
- Map of future, proposed and current green corridors together with Blue Ribbon (Wandle) Corridor and railway corridor (green chain) (Map 8);

**Section 5: Our Neighbourhood Plan – Movement Policies**

- Baseline information on pedestrian and cycle networks;
- Public transport accessibility (PTAL) map (map on page 60)

**Section 5: Our Neighbourhood Plan – Community Infrastructure**

- Map showing heritage designations and assets, including:
  - Riverside, Middleton Road;
  - 40-48 (even) Mill Green Road ‘Villas’;
  - 9-15 9odd) and 19-25 9odd) hackbridge Green;
  - The Old Red Lion;
  - 258 London Road (19th Century Building)
  - BedZED;
  - Hackbridge Station
  - Culvers Lodge;
  - Beddington Corner Area of Special Local Character (ASLC);
  - Beddington Park Conservation Area;
  - Grade II Listed Buildings.

**Appendices**

- Appendix 2 - Evidence base, guidance and bibliography (see list on page 2)
- Appendix 11 - Hackbridge & Beddington Corner Housing Needs Report by AECOM

**Sutton Local Plan (Proposed Submission) (January 2017)**

The following Borough studies – which include the Hackbridge and Beddington Corner Area within their geographical scope - were undertaken in house or commissioned by the Council as part of the initial Local Plan evidence gathering stage:

- Five Year Housing Land Supply;
- Strategic Housing Market Assessment;
- Housing and Economic Land Availability Assessment;
- Town Centres and Economic Development Assessment;
- Town Centre Uses Evidence Paper;
- District Centres Health Check;
- Local Centre Health Check;
- Infrastructure Study;
- Green Belt and Metropolitan Open Land Review;
- Open Space Study;
- Employment Land Review;
- Characterisation Study;
- Locally Listed Building Review;
- Sites of Importance for Nature Conservation;
- Strategic Flood Risk Assessment Level 1 Report;
- Ownership of Sites Study;
- Infrastructure Study;
- Strategic Flood Risk Assessment (SFRA) Level 2 Report (AECOM, July 2016);
- GLA Energy Planning monitoring report;
- Authority Monitoring Report (AMR) 2015-16.

Following public consultation on the Local Plan ‘Issues and Preferred Options’ documents between February and April 2016, a number of additional London-wide Borough studies and updates have been prepared, including:

- School Site Search – Post Consultation Update (LB Sutton, October 2016);
- Sites of Interest for Nature Conservation (SINC) Review (LB Sutton, December 2016);
- Green Belt and MOL Update (LBS, 2016);
- Transport outside Sutton Town Centre; updated Housing and Economic Land Availability Assessment (SHELAA);
- Ownership of Sites Study;
- Infrastructure Study;
- Strategic Flood Risk Assessment (SFRA) Level 2 Report (AECOM, July 2016);
- GLA Energy Planning monitoring report;
- Authority Monitoring Report (AMR) 2015-16.
All of the above documents making up Sutton’s Local Plan evidence base are available on the Council’s website alongside the draft Local Plan (Proposed Submission) and the SA Report.

Sustainability Appraisal (SA)/ SEA of Sutton Local Plan Proposed Submission (LBS, Jan 2017)
Chapter 4 of the SA Report on Sutton’s emerging Local Plan sets out the environmental, social and economic baseline for Sutton (including key population/demographic data and a range of maps) as the basis for undertaking the appraisal of the Council’s draft policies and proposals for the future development of the Borough up to 2031 (Chapter 10). The range of indicators covered reflected the Council’s sustainability objectives and targets developed for inclusion in Sutton SA Framework from the earliest ‘scoping’ stages of the appraisal process. Much of this baseline information is relevant to the Hackbridge and Beddington Corner area.

*It should be noted that the SA process as applied to Sutton’s Local Plan has been designed to meet the requirements of the SEA Regulations at the same time. This means that the Council’s emerging planning policies, land-use designations and site allocations have already been subjected to SEA.*

Sutton Authority Monitoring Report (AMR) 2015-16 (LBS, January 2017)
The Sutton AMR 2015-16 reports on a wide range of key environmental, social and economic indicators in order to assess the effectiveness of Council’s existing planning policies in delivering their stated objectives as set out in the Core Planning Strategy DPD adopted in December 2009 and the Site Development Policies DPD adopted in March 2012. The AMR provides a useful overview of the main drivers of spatial change (e.g. population growth), planning constraints and the key social, economic and environmental issues affecting the future development and growth of the Borough.

(6) Assessment of Environmental Effects
In considering whether or not there are ‘likely significant effects’ for the purposes of the SEA screening, account should be taken of each of the criteria listed in Schedule 1 of the SEA Regulations.

These criteria are listed below in the Table below together with those neighbourhood plan policies, proposals and projects being put forward which would be expected to have a generally beneficial environmental impact.

<table>
<thead>
<tr>
<th>SEA Criteria</th>
<th>Draft Neighbourhood Plan Policies and Proposals with Beneficial Environmental impacts</th>
</tr>
</thead>
<tbody>
<tr>
<td>SEA Criteria</td>
<td>Draft Neighbourhood Plan Policies and Proposals with Beneficial Environmental impacts</td>
</tr>
<tr>
<td>-------------------</td>
<td>------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Fauna and Flora</td>
<td>• Policy H&amp;BEP1: Local character and sense of place &amp; sense of place for current public green spaces; Proposals for Open Green Spaces (Map 6); Policy EP2 – Local Green Space Designation; Proposals for local designation of Green Spaces; Policy EP4 - Management of current public green spaces; Policy EP5 - Trees; Policy EP6 - Management of new public green spaces; Policy EP6 - Green Infrastructure; Green Infrastructure Proposals (Map 8, page 50); Policy EP7 - Climate change mitigation; Policy EP8 – Rainwater harvesting; Policy EP9 - Water efficient landscape design; Proposed Neighbourhood Project: Edible bus stops; Proposed Neighbourhood Project: Healthy Hackbridge and Beddington Corner;</td>
</tr>
<tr>
<td>Air</td>
<td>• Policy EP3 - Trees; Policy EW&amp;WP1 - Better buildings for the future; Policy MP1 - Pedestrian and cycle networks (Transport Proposals); Policy MP2 - Transport; Policy MP3 - Air quality; Policy MP4 - Car clubs and electric cars; Proposed Neighbourhood Project: Installation of air pollution monitoring; Proposed Neighbourhood Project: Environmental Behaviour Change;</td>
</tr>
<tr>
<td>Climatic factors</td>
<td>• Policy H&amp;BEP2: Sustainable design for Sustainable living; Policy H&amp;BEP3 Design for sociability; Proposals for Open Green Spaces (Map 6); Policy EP3 - Trees; Policy EP4 - Man of current public green spaces; Policy EP5 - Management of new public green spaces; Policy EP6 - Green Infrastructure; Policy MP2 – Community Infrastructure Levy (CIL); Green Infrastructure Proposals (Map 8, p50); Policy EP7 - Climate change mitigation; Policy EP8 – Rainwater harvesting; Policy EP9 - Water efficient landscape design; Policy EW&amp;WP1 - Better buildings for the future; Project: Retrofitting; Proposed Neighbourhood Project: Environmental Behaviour Change;</td>
</tr>
<tr>
<td>Material assets1</td>
<td>• Policy H&amp;BEP4 - Housing needs for Hackbridge residents; Policy LEP1 - Employment land; Policy LEP2 - Employment opportunities in Hackbridge; Policy LEP3 Emp opportunities – Hackbridge Railway Station car park and adjacent land; Policy MP2 - Transport; Policy MP4 - Car clubs and electric cars; Policy CIP1 - Community Infrastructure Levy (CIL); Green Infrastructure Proposals (Map 8, p50); Policy EP7 - Climate change mitigation; Policy EP8 – Rainwater harvesting; Policy EP9 - Water efficient landscape design; Policy EW&amp;WP1 - Better buildings for the future; Project: Retrofitting; Neighbourhood Project: Identification and retention of heritage assets; Neighbourhood Project: Community-led Housing Development; Neighbourhood Project: Green Business and Green Business Network; Neighbourhood Project: Community Shops; Neighbourhood Project: Local Supply Chains; Neighbourhood Project: Local Employment; Proposed Neighbourhood Project: Redesign corner of Hackbridge Green;</td>
</tr>
<tr>
<td>Cultural heritage etc</td>
<td>• Policy H&amp;BEP1: Local character &amp; sense of place &amp; sense of place for current public green spaces; Proposed Neighbourhood Project: Identification and retention of heritage assets; Proposed Neighbourhood Project: Redesign corner of Hackbridge Green;</td>
</tr>
<tr>
<td>Landscape.</td>
<td>• Policy H&amp;BEP1: Local character &amp; sense of place &amp; sense of place for current public green spaces; Policy EP1 - Access to Wandle Valley Regional Park (WVRP); Proposals for Open Green Spaces (Map 6); Policy EP2 – Local Green Space Designation; Proposals for local designation of Green Spaces; Policy EP3 - Trees; Policy EP4 - Management of new public green spaces; Policy EP5 - Management of new public green spaces; Policy EP6 - Green Infrastructure; Green Infrastructure Proposals (Map 8, page 50); Proposed Neighbourhood Project: Redesign corner of Hackbridge Green;</td>
</tr>
</tbody>
</table>

1 ‘material assets’ include a wide range of social, environmental and economic assets including: transport, waste and minerals, water, energy, industry, housing, schools, public buildings, shops, post office, library.
(7) Consultation with Statutory Consultees

Historic England (David English) – received by email on 23 March 2017
Taking into account the scale, nature and location of the neighbourhood area and the likely environmental impacts of the policies set out in the Neighbourhood Plan, Historic England supported the Borough’s view that there are unlikely to be significant environmental effects and therefore agrees that the Plan should not require an SEA.

In line with Historic England’s advice provided to the Neighbourhood Development Group dated 20 April 2016 on an earlier draft of the Neighbourhood Plan, Historic England sought to highlight the archaeological potential within the neighbourhood area, notably the Wandle Gravels Archaeological Priority Area (APA).

“Although the APAs in the London Borough of Sutton have not been reassessed yet as part of the Greater London programme being actioned by Historic England, a rapid assessment of the area indicates a high potential for archaeology across a number of periods with the possibility for areas within the Plan area to be assessed as being of Tier 1 quality, nationally important. While proposals such as groundwater boreholes (EP8) could impact upon archaeology, it may be the case that they would not cause ‘significant environmental effects’, such that would require SEA. However, this will be largely dependent upon proposed locations on a case by case basis”.

Historic England would therefore advise the Neighbourhood Development Group to contact the Greater London Archaeology Advisory Service for further advice (contact Mark Stevenson mark.stevenson@historicengland.org.uk).

Historic England also noted that, having been consulted on an earlier version of the Plan, they had not yet been consulted on the pre-submission draft. This is despite heritage being included among the key objectives (6.2).

Natural England (Rebecca Ingram) – received by email on 17 March 2017
Natural England considered that, as far as their strategic environmental interests are concerned (including but not limited to statutory designated sites, landscapes and protected species, geology and soils), that there are unlikely to be significant environmental effects from the proposed plan.
Reference was made to National Planning Practice Guidance highlights three triggers that may require the production of an SEA, for instance where:

• 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 may have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan.

Based on the information provided, Natural England confirmed that in their view the proposals contained within the plan will not have significant effects on sensitive sites that Natural England has a statutory duty to protect. While Natural England are not aware of significant populations of protected species which are likely to be affected by the policies / proposals within the plan, it remains the case, however, that the responsible authority should provide information supporting this screening decision, sufficient to assess whether protected species are likely to be affected.
(8) SEA Screening Considerations
While it is clear from the broad assessment set out above that the policies, proposals and projects included in the Draft Neighbourhood Plan would be expected to have positive environmental impacts on each of the criteria listed in Schedule 1 of the SEA Regulations, the following screening considerations should be taken into account in addressing the key question of ‘significance’:

(1) The Draft Hackbridge and Beddington Corner Neighbourhood Development Plan is in general conformity with both the existing local development plan for the Borough (i.e. Core Planning Strategy and Site Development Policies DPD) and Sutton’s emerging Local Plan;

(2) The policies, proposals and site allocations included within Sutton’s emerging Local Plan have already been subjected to full sustainability appraisal (SA) incorporating SEA from the earliest stages of the plan review process in December 2014;

(3) The draft Neighbourhood Development Plan does not allocate new sites for development (for housing, employment etc.) that have not already been appraised through the SA of the emerging Local Plan;

(4) While the Hackbridge and Beddington Corner Neighbourhood Area incorporates a range of locally important environmental and cultural assets, these do not include ‘sensitive’ assets as defined in the SEA regulations. Furthermore, the impact of the Council’s existing local development plan and the emerging Local Plan in terms protecting and enhancing these assets has already been assessed through the SA/SEA process;

(5) While it is acknowledged that parts of the Hackbridge area is affected by both fluvial and surface water flooding issues, the Council considers that the site assessment and technical guidelines set out in Sutton’s Strategic Flood Risk Assessment (SFRA) Level 2 Report (July 2016 as amended) provides sufficient detailed guidance to ensure that each of the key site allocations can be developed to ensure that it is safe for the occupants and does not cause additional flood risk problems to adjacent land uses.

**SEA Screening Conclusion**

On the basis of the information provided and for the reasons outlined in Section 7 above, the Council considers that a full Strategic Environmental Assessment (SEA) is not required and that therefore an Environmental Statement (ES) does not need to be prepared for submission to the Council alongside the Draft Hackbridge and Beddington Corner Neighbourhood Development Plan.
Purpose of Habitats Regulations Screening

This report sets out the results of a screening exercise undertaken by the Council to determine whether the subsequent stages of Habitats Regulations Assessment, commonly referred to as Appropriate Assessment (AA), are required as part of the preparation of the Hackbridge and Beddington Corner Neighbourhood Development Plan.

The purpose of the Habitats Regulations Screening is to assess whether any of the policies, proposal or projects the draft Plan ‘are likely to have significant effects, either alone or with other plans or projects, on the protection or integrity of any designated European site within or adjacent to the London Borough of Sutton. European sites are those of exceptional importance for rare, endangered or vulnerable natural habitats and species within the EU.

Background

The requirement for Appropriate Assessment (AA) of plans or projects is outlined in Article 6(3) and (4) of the European Communities (1992) Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (known as the ‘Habitats Directive’).

The aim of the Habitats Directive is to conserve natural habitats and wild species across Europe by establishing a network of sites known as Natura 2000 sites. Under Article 6(3) of the Habitats Directive, an ‘appropriate assessment’ (AA) is required where a plan or project is likely to have a significant effect upon a European site, either individually or in combination with other projects. Further to this, Article 6(4) states that where an appropriate assessment has been carried out and results in a negative assessment (in other words, the development will adversely affect the site(s) despite any proposed avoidance or mitigation measures or if uncertainty remains), consent will only be granted if there are no alternative solutions, there are Imperative Reasons of Overriding Public Interest (IROPI) for the development, and compensatory measures have been secured.

The protection given by the Habitats Directive have been incorporated into UK legislation through the Habitats Regulations 2010 (as amended). The Regulations are responsible for safeguarding designated European sites within the UK and therefore for protecting the habitats and species listed in the Annexes of the Directive. These include Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Ramsar sites and sites identified, or required, as compensatory measures for adverse effects on any of the above sites.

The purpose of undertaking AA in the preparation of land use plans is to ensure that the protection and integrity of European sites is part of the planning process at the regional and local level. In October 2005, the European Court of Justice ruled that AA must be carried out on all land use planning documents in the UK. In response to this ruling, a new section 3 (Part IVA) was inserted into the Habitats Regulations in August 2007 (Regulations 85A-85E) which requires local planning authorities to undertake AA of land use plans in England and Wales in accordance with the Directive.

Appropriate Assessment: Key Tasks

Government guidance defines AA as follows:

“an assessment which must be appropriate to its purpose under the Habitats Directive and the Regulations, neither of which specify how the stages of AA should be undertaken. The AA must be recorded and carried out with a view to informing the decisions in the plan”.

The AA process as prescribed in Article 6(3) and (4) of the Habitats Directive can be summarised into three main tasks:

- Task 1: Likely significant effects (screening);
Task 2: Appropriate assessment and ascertaining the effect on site integrity; and
Task 3: Mitigation and alternative solutions.

The purpose of Task 1 is to identify whether an emerging plan option is ‘likely to have a significant effect’ on a European site within or adjacent to the plan area. This task is referred to as ‘screening’ under the Regulations.

The outcome of screening (Task 1) determines whether Tasks 2 and 3 are required. Under the Regulations, Tasks 2 and 3 are required when, in view of a European site’s conservation objectives, the effect of a land use plan:

- is likely to have a significant impact on a European site in Great Britain (either alone or in combination with other plans and projects); and
- is not directly connected with or necessary to the management of the site.

In situations where significant indirect impacts of plan implementation could occur within Natura 2000 sites beyond the plan area, these remote sites should be considered during Task 1 (screening). If the potential for significant adverse impacts on European sites is identified during Task 1, the AA should consider the potential for impacts in more detail and whether alternative measures can be adopted. If there are no viable alternatives, the Plan can only be implemented if there are ‘imperative reasons of overriding public interest’ (Article 6(4)).

Appropriate Assessment must be undertaken in consultation with Natural England (the statutory nature conservation organisation. It must be consulted from the beginning of the process alongside any other relevant environmental bodies that the local planning authority deems appropriate.

This Screening Report represents the outcome of AA Task 1 in relation to the Hackbridge and Beddington Corner Neighbourhood Development Plan.

Identification of European Sites

The first step of the screening process involved identifying the European sites that may potentially be affected by Sutton’s Local Plan. Using the Natural England\(^4\) and Joint Nature Conservation Committee\(^5\) websites, and in line with the ‘Appropriate Assessment of Further Alterations to the London Plan’, all European sites within a 10 km zone extending from the edge of the Borough boundaries (i.e. the Plan area) were identified. European sites for the purpose of this Screening Report are set out below in Table 3.1 and shown in Maps 3.2 to 3.6.

<table>
<thead>
<tr>
<th>European Sites located within 10km of the Plan Area</th>
<th>Area</th>
<th>Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>Richmond Park SAC</td>
<td>846.68 ha</td>
<td>RB Kingston</td>
</tr>
<tr>
<td>Wimbledon Common SAC</td>
<td>348.31 ha</td>
<td>LB Merton</td>
</tr>
<tr>
<td>Mole Gap to Reigate Escarpment SACa</td>
<td>887.68 ha</td>
<td>Surrey</td>
</tr>
<tr>
<td>Ockhama and Wisley Commons SSSI (part of Thames Basin Heaths SPA)</td>
<td>269.6 ha</td>
<td>Surrey</td>
</tr>
</tbody>
</table>

All of these sites lies beyond the boundaries of the London Borough of Sutton.

A full description of the condition of each of the above sites, including location maps is set out in Appendix 4 of Sutton’s SA Report on Local Plan ‘Issues and Preferred Options’ published by the London Borough of Sutton in February 2016. See https://drive.google.com/file/d/0B5l397zoXtVQcGJjOUdWOW9pS0U/view

Screening Assessment Criteria

Each of the policies, proposals and projects set out in the draft plan have been assessed for their potential to result in significant impacts on the European sites identified in the table above. The

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\(^4\) http://www.naturalengland.org.uk and http://www.magic.gov.uk
\(^5\) http://www.jncc.gov.uk
following set of screening criteria have been used as the basis for the assessment which are based on Natural England guidance on ‘The Habitats Regulations Assessment of Regional Spatial Strategies and Sub-Regional Strategies’ (March 2007) and guidance prepared by the Planning Inspectorate in 2013

Table 4.1: Habitats Directive Screening Criteria for Sutton’s Local Plan

<table>
<thead>
<tr>
<th>Reason why policy will have no effect on a European site</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. The policy will not itself lead to development (e.g. it relates to design or other qualitative criteria for development, or it is not a land use planning policy).</td>
</tr>
<tr>
<td>2. The policy makes provision for a quantum / type of development (and may or may not indicate one or more broad locations e.g. a county, or district, or sub-region) but the location of the development is to be selected following consideration of options in lower tier plans (development plan documents).</td>
</tr>
<tr>
<td>3. No development could occur through this policy alone, because it is implemented through subordinate policies that are more detailed and therefore more appropriate to assess for their effects on a European site and associated sensitive areas.</td>
</tr>
<tr>
<td>4. Concentration of development in urban areas will not affect a European site and will help to steer development and land use change away from a European site and associated sensitive areas.</td>
</tr>
<tr>
<td>5. The policy will help to steer development away from a European site and associated sensitive areas, e.g. not developing in areas of flood risk or areas otherwise likely to be affected by climate change.</td>
</tr>
<tr>
<td>6. The policy is intended to protect the natural environment, including biodiversity.</td>
</tr>
<tr>
<td>7. The policy is intended to conserve or enhance the natural, built or historic environment, and enhancement measures will not be likely to have any effect on a European site.</td>
</tr>
</tbody>
</table>

Reason why policy could have a potential effect.

| 8. The Local Development Framework steers a quantum or type of development towards, or encourages development in, an area that includes a European site or an area where development may indirectly affect a European site; |

Reason why policy would be likely to have a significant effect.

| 9. The policy makes provision for a quantum, or kind of development that in the location(s) proposed would be likely to have a significant effect on a European site. The proposal must be subject to appropriate assessment to establish, in light of the site’s conservation objectives, whether it can be ascertained that the proposal would not adversely affect the integrity of the site. |

Habitats Directive Screening Conclusions
The outcome of screening the the draft Hackbridge and Beddington Corner Neighbourhood Development Plan against the nine assessment criteria shows that none of the preferred options, strategic alternatives or draft policies is considered to have either a ‘potential’ or ‘significant effect’ upon a European Site as described under criteria 8 or 9 below):

- **Criterion 8 (Reason why policy could have a potential effect):** The preferred option or draft policy steers a quantum or type of development towards, or encourages development in, an area that includes a European site or an area where development may indirectly affect a European site;

- **Criterion 9 (Reason why policy would likely to have a significant effect):** The policy makes provision for a quantum, or kind of development that in the location(s) proposed would be likely to have a significant effect on a European site. The proposal must be subject to appropriate assessment to establish, in light of the site’s conservation objectives, whether it can be ascertained that the proposal would not adversely affect the integrity of the site.

Habitats Directive Screening Conclusion
It is therefore considered that a full Habitats Regulations Assessment (Appropriate Assessment) will not need to be prepared in support of the Draft Submission version of Sutton’s Local Plan.
Date: 17 March 2017  
Our ref: 209940  
Your ref: SEA Screening Opinion

Dear Patrick,

Screening consultation: Hackbridge & Beddington Corner Neighbourhood Plan - Strategic Environmental Assessment.  
Location: Hackbridge & Beddington Corner, London Borough of Sutton.

Thank you for your consultation on the above dated 2 March 2017 which was received by Natural England on the same day.

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.

Screening Request: Strategic Environmental Assessment

It is our advice, on the basis of the material supplied with the consultation, that, in so far as our strategic environmental interests are concerned (including but not limited to statutory designated sites, landscapes and protected species, geology and soils), that there are unlikely to be significant environmental effects from the proposed plan.

Neighbourhood Plan

Guidance on the assessment of Neighbourhood Plans in light of the SEA Directive is contained within the National Planning Practice Guidance. The guidance highlights three triggers that may require the production of an SEA, for instance where:

- 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 may have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan.

We have checked our records and based on the information provided, we can confirm that in our view the proposals contained within the plan will not have significant effects on sensitive sites that Natural England has a statutory duty to protect.

We are not aware of significant populations of protected species which are likely to be affected by the policies/proposals within the plan. It remains the case, however, that the responsible authority should provide information supporting this screening decision, sufficient to assess whether protected species are likely to be affected.

Notwithstanding this advice, Natural England does not routinely maintain locally specific data on all potential environmental assets. As a result the responsible authority should raise environmental issues that we have not identified on local or national biodiversity action plan species and/or habitats, local wildlife sites or local landscape character, with its own ecological and/or landscape advisers, local record centre, recording society or wildlife body on the local landscape and biodiversity receptors that may be affected by this plan, before determining whether an SA/SEA is necessary.

Please note that Natural England reserves the right to provide further comments on the environmental assessment of the plan beyond this SEA/SA screening stage, should the responsible authority seek our views on the scoping or environmental report stages. This includes any third party appeal against any screening decision you may make.

For any queries relating to the specific advice in this letter only please contact Rebecca Ingram on 02080267712 or rebecca.ingram@naturalengland.org.uk. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours Sincerely,

Rebecca Ingram
Thames Team
Sustainable Development
Dear Mr Whitter,


Historic England welcomes the London Borough of Sutton’s screening report which helpfully sets out the contents of the Draft Hackbridge and Beddington Corner Neighbourhood Plan. We note that having been consulted on an earlier version of the Plan, we have not yet been consulted on the pre-submission draft. This is despite heritage being included among the key objectives (6.2). However, for the purposes of advising on this screening report we have reviewed the Plan to establish the likelihood of it causing significant environmental effects.

In line with our advice dated 20th April 2016 on an earlier draft of the Neighbourhood Plan, we would draw your attention to the archaeological potential within the neighbourhood area, notably the Wandle Gravels Archaeological Priority Area. The APAs in Sutton have not been reassessed yet as part of the Greater London programme being actioned by Historic England. However, a rapid assessment of the area indicates a high potential for archaeology across a number of periods with the possibility for areas within the Plan area to be assessed as being of Tier 1 quality, nationally important. While proposals such as groundwater boreholes (EP8) could impact upon archaeology, it may be the case that they would not cause ‘significant environmental effects’, such that would require SEA. However, this will be largely dependent upon proposed locations on a case by case basis. Therefore I would encourage you/the Forum to contact the Greater London Archaeology Advisory Service for further advice. I have copied my colleague Mark Stevenson into this email, who is best placed to advise.

Taking into account the scale, nature and location of the neighbourhood area and the likely environmental impacts of the policies in this Neighbourhood Plan in terms of built heritage, Historic England agrees with the Borough’s screening opinion set out in table 4.1 that there are unlikely to be significant environmental effects caused by this Plan. As such we agree that this Plan would not require an environmental assessment.

Finally I must note that this opinion is based on the information provided by you and for the avoidance of doubt does not take precedence over our obligation to advise you on, and potentially object to development proposals which may subsequently arise from this Neighbourhood Plan and which may have adverse effects on the environment.
Yours sincerely,

David English MA MSc IHBC
Historic Places Adviser
Planning Group: London
Historic England | 1 Waterhouse Square | 138-142 Holborn | London | EC1N 2ST
Direct dial: 020 7973 3747

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