

**Determination Statement**  
on the need for a  
**Strategic Environmental Assessment (SEA)**  
and  
**Habitats Regulations Assessment (HRA)**

Draft Twyford Neighbourhood Plan 2018 – 2038  
(Submission Plan)

August 2022

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## Summary

Following consultation with statutory bodies, Wokingham Borough Council ('the Council') determines that the Twyford Neighbourhood Plan does not require a Strategic Environmental Assessment (SEA).

### 1. Introduction & Background

- 1.1. This screening statement relates to, and should be read in conjunction with, the submitted Twyford Neighbourhood Plan (August 2022).
- 1.2. A provisional draft screening opinion was used to determine whether or not the contents of the draft Twyford Neighbourhood Plan required a Strategic Environmental Assessment (SEA) in accordance with the European Directive 2011/42/EC (the Directive) and associated Environmental Assessment of Plans and Programmes Regulations 2004 (the Regulations).
- 1.3. The National Planning Policy Framework (NPPF) at paragraph 32 ensures that the preparation of local plans and spatial development strategies are informed by a sustainability appraisal that meets the relevant legal requirements. The narrative is supported by footnote 19 which states that *'the reference to legal requirements refers to Strategic Environmental Assessment. Neighbourhood plans may require Strategic Environmental Assessment, but only where there are potentially significant environmental effects'*.
- 1.4. In accordance with national policy and legislation, this Screening Statement has been prepared to consider whether the Twyford Neighbourhood Plan is likely to give rise to significant environmental effects, or not<sup>1</sup>. The Screening Assessment uses the set of criteria from Annex II of the Directive and Schedule 1 of the Regulations and is set out in **Section 3** of this report.
- 1.5. The screening opinion was also used to assess the Twyford Neighbourhood Plan through the Habitats Regulations process, which looks at the potential for significant impacts on nature conservation sites that are of European importance, also referred to as the National Sites Network (formerly Natura 2000 sites). The 'Screening Assessment' uses the Habitats Regulations Assessment for the adopted Core Strategy (2010) and Managing Development Delivery (2014) local plans as its basis for assessment. The Screening Assessment is set out in **Section 4** of this report.
- 1.6. The initial screening opinion was subject to consultation with the Environment Agency, Historic England and Natural England. The results of the screening process are detailed in **Section 5** of this Screening Statement.

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<sup>1</sup> Environmental Assessment of Plans and Programmes Regulations 2004

## Twyford Neighbourhood Plan

- 1.7. Neighbourhood planning gives communities the power to develop a shared vision for their area and are prepared by a town/parish council or neighbourhood forum for a designated neighbourhood area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions. This is because, if successful at an independent examination and subsequent referendum, the Twyford Neighbourhood Plan will form part of the council's statutory development plan<sup>2</sup>.
- 1.8. Twyford Parish Council has taken the decision to prepare a Neighbourhood Plan for the whole of their parish. Twyford Parish was designated as a neighbourhood area on 6 August 2018. A provisional screening opinion on a working draft version of the plan, comprising fifteen draft planning policies (November 2021), was undertaken with the relevant environmental bodies on 3<sup>rd</sup> March 2022 for a period of five weeks. With the exception of four additional policies, this was the version that was subject to Regulation 14 (Pre-submission) consultation under the Neighbourhood Planning (General) Regulations 2012 from 8 April to 20 May 2022.
- 1.9. Whilst the Council undertook a provisional screening opinion from April to May 2022, the neighbourhood planning group included four further policies (Policy TW9: Carbon Sequestration; Policy TW11: Water Infrastructure and Flood Risk; Policy TW14: First Homes Exception Sites and Policy TW19: Early Years Provision) in the draft Neighbourhood Plan (April 2022). The Council is of the view that the differences between the draft version (April 2022) of the plan and the submitted plan (August 2022) are minor. Furthermore, it is considered that the nature and scope of the additional policies in the version of the draft plan (April 2022) are unlikely to give rise to significant environmental effects in the context of SEA and HRA and therefore additional screening is not necessary. In addition, the draft Twyford Neighbourhood Plan was subject to formal public consultation (Regulation 14) at which point the relevant environmental bodies did not raise any further issues regarding the neighbourhood plan. This determination statement therefore takes into account earlier consultations and responses from the relevant environmental bodies.
- 1.10. Further details of the Twyford Neighbourhood Plan is provided in **Section 2**.

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<sup>2</sup> section 3 of the Neighbourhood Planning Act 2017

## 2. Twyford Neighbourhood Plan

- 2.1. Twyford Parish Council formally submitted their Neighbourhood Plan to the Council in August 2022. The submitted plan is published for public consultation under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012. The Neighbourhood Plan will supplement the policies contained within Wokingham Borough Council's Core Strategy (adopted 2010), the Managing Development Delivery (MDD) Local Plan (adopted 2014) and the emerging Local Plan Update, with regard to the parish of Twyford. Once adopted, the Neighbourhood Plan will cover the period to 2038.
- 2.2. The Twyford Neighbourhood Plan will contain policies that will help guide decisions on development proposals in the parish. The current draft vision for the neighbourhood plan is:

*“The quality of life for both present and future generations have been improved by encouraging the right type and mix of well-designed new homes, protecting and enhancing our services and facilities, the historic and natural environment.*

*New homes have helped address local need and their design respects the local character of the village.*

*Safer routes for pedestrians and cyclists have reduced the reliance on cars. Good transport links have been maintained and improved and technological changes alongside the provision of supporting infrastructure, has resulted in increased use of fuel-efficient and electric models of transport. These changes are benefitting the environment, the thriving village centre and the health and well-being of residents and visitors.*

*With the vision realised, Twyford has retained a cohesive village community and continues to act as a thriving hub for the community and those travelling from the surrounding areas.”*

- 2.3. The plan's draft objectives are as follows:

- Encouraging a modal shift in means of transport
- Supporting and encouraging improvements to the accessibility and the quality of the environment at Twyford Railway Station
- Encouraging measures to prevent further deterioration of existing poor air quality
- Supporting the role of the village centre
- Adapting and preparing for climate change and zero carbon living
- Securing a more appropriate mix of housing in new developments which recognises the need for a balanced community
- Conserving and enhancing the special heritage character of the village and its landscape setting
- To sustain community facilities and services that are essential to community life

2.4. The submitted neighbourhood plan contains nineteen policies:

- **Policy TW1: Encouraging Active Travel** seeks to support active travel in the parish by identifying an Active Travel Network and promotes active travel in new development proposals through key design principles.
- **Policy TW2: Sustainable Accessibility and Mobility** seeks to encourage sustainable travel in the parish by ensuring new development proposals deliver electric vehicle charging infrastructure and are supported by travel plans.
- **Policy TW3: Twyford Railway Station** seeks to support collaborative working with Wokingham Borough Council, Great Western Railway, Twyford Parish Council and other stakeholders to identify improvements to Twyford Railway Station. The policy also ensures that future development proposals contribute towards necessary improvements to the accessibility and quality of the environment at Twyford Railway Station.
- **Policy TW4: A Thriving Village Centre** continues to support and protect active commercial, business or service uses at Twyford Village Centre and existing Primary Shopping Areas.
- **Policy TW5: Village Centre Regeneration Area** identifies a scheme at the crossroads of Twyford Village Centre and ensures future development proposals mitigate any impacts on the Air Quality Management Area (AQMA).
- **Policy TW6: Improving Air Quality** seeks to ensure that future development proposals within or adjacent to the Twyford Crossroads Air Quality Management Area, or proposals that are sensitive to air pollution, contribute to actions and objectives set out in the Council's Air Quality Action Plan. The policy ensures development proposals are supported by an air quality assessment and identify measures to mitigate impacts on local air quality.
- **Policy TW7: Nature Recovery and Climate Change** seeks to identify a Green and Blue Infrastructure Network to support / promote nature recovery (including achieving net gains in biodiversity) and mitigate impacts of climate change.
- **Policy TW8: Tree Canopy Cover** seeks to ensure future development proposals maximise tree canopy cover through the retention of existing trees, tree planting or the provision of green infrastructure.
- **Policy TW9: Carbon Sequestration\*** seeks to ensure development proposals incorporate woodland planting or contribute towards Wokingham Borough's Carbon Offset Fund to improve, extend and maintain the Twyford Nature Recovery Network.

- **Policy TW10: Zero Carbon Buildings** seeks to deliver a step change in the energy performance of all new developments by encouraging and incentivising the use of Passivhaus standards to achieve 'zero carbon' development.
- **Policy TW11: Water Infrastructure and Flood Risk\*** seeks to ensure future development proposals can demonstrate how they manage flood risk, achieve water efficiency standards and capacity with existing wastewater infrastructure.
- **Policy TW12: New Homes** seeks to ensure future development proposals provide an appropriate mix and type of housing. The policy is supported by a Housing Needs Assessment of the neighbourhood area.
- **Policy TW13: First Homes** seeks to deliver a proportion of housing as First Homes within the neighbourhood area (parish of Twyford). The policy is supported by a Housing Needs Assessment.
- **Policy TW14: First Homes Exception Sites\*** seeks to identify the circumstances in which First Homes can be provided on exception sites outside the development limits of Twyford.
- **Policy TW15: Design Codes** establishes design principles for specific character areas in the neighbourhood plan area, including the Twyford Conservation Area and the Twyford Station Conservation Area. The policy will be supported by a Design Guidelines and Code Report.
- **Policy TW16: Buildings of Traditional Local Character** seeks to identify specific buildings and structures in the neighbourhood area as 'Buildings of Traditional Local Character' based on their local architectural or historic interest.
- **Policy TW17: Twyford Community Hub (Old Polehampton School)** supports the continued redevelopment of the Old Polehampton Boys School to deliver a new Twyford Community Hub.
- **Policy TW18: Community Facilities** seeks to safeguard existing community facilities in the neighbourhood plan area. This policy also supports improvements, extensions or the partial redevelopment of community facilities provided they are appropriately designed.
- **Policy TW19: Early Years Provision\*** seeks to safeguard existing facilities that support early years provision. This policy also supports improvements to early years facilities provided they accord with relevant policies of the development plan.

\*These policies were included in the April 2022 (Regulation 14) version of the draft Twyford Neighbourhood Plan

- 2.5. The submitted Twyford Neighbourhood Plan does not allocate any sites for housing or other land uses not already allocated in the adopted Core Strategy or MDD local plans. The neighbourhood plan continues to support Twyford Village Centre, as defined in Policy CP13 of the adopted Core Strategy (see paragraph 2.4 above).
- 2.6. Regarding the natural environment, there are no designated international sites in the neighbourhood plan area. The nearest Special Protection Area (SPA) is the Thames Basin Heaths SPA, located more than 10km (12km) south from its nearest point. The nearest sites of Special Area of Conservation (SAC) are: Chiltern Beechwoods SAC located approximately 9km north-east from its nearest point, the Thursley, Ash, Pirbright and Chobham SAC and the Windsor Forest and Great Park SAC are both located approximately 11km to 17km south-east and east at their respective nearest points. There are no Sites of Special Scientific Interest (SSSI) in the designated neighbourhood plan area. There are a number of SSSIs located in proximity to the parish of Twyford, notably, Lodge Wood and Sandford Mill SSSI, which is approximately 1km south from its nearest point. Harpsden Wood SSSI is also just over the borough boundary and into South Oxfordshire, less than 5km (3km) north-west from its nearest point. Great Thrift Wood, another SSSI, is just over the borough boundary into the Royal Borough of Windsor and Maidenhead and is approximately 7km east from its nearest point.
- 2.7. Twyford Parish contains two Conservation Areas: Twyford Village Conservation Area, which was designated in December 1977 and Twyford Station Conservation Area, designated in June 1996.
- 2.8. The Twyford Village Conservation Area is situated in the southern part of Twyford Parish, located within the built-up area of Twyford<sup>3</sup>. It focuses on High Street and London Road, originally known as Old Bath Road. High Street comprises several historic buildings, including Grade II listed buildings at Electrovert The Bell Public House and The Duke of Wellington Public House, and the Grade II listed building at Jenners Butchers. London Road also comprises several historic buildings, including the Grade II listed buildings at NSS Newsagent, Apsley House, The White House and The Orchard and the Grade II\* listed building at The Harrison Almshouses. According to the latest Conservation Area Appraisal, the building styles are generally modest with a combination of rendered and red brick frontages. Housing within this Conservation Area varies from small scale terraced cottages to large, detached, double fronted villas. There are many historic buildings in and around the Conservation Area, including the Grade II listed building at St Mary's Church, dating back to the 19<sup>th</sup> Century and the Grade II\* listed building at the Almshouses, which is recognised as one of the oldest buildings in the village.
- 2.9. The Twyford Station Conservation Area is adjacent to and south of the Twyford Conservation Area within the built-up area of Twyford. According to the latest Conservation Area Appraisal, the designated area focuses on the Victorian era of

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<sup>3</sup> Twyford Conservation Area (2013), available at: <https://www.wokingham.gov.uk/planning/planning-permission/listed-buildings-heritage-and-conservation-areas/>



development in the village associated with the Great Western Railway<sup>4</sup>. The area is characterised by unaltered terraces of mostly two storey cottages along Station Road and Brook Street and encompasses the station and terraced cottages on the west side of Waltham Road. There are several historic buildings in the Conservation Area, including the Old Station House, which dates back to the 20<sup>th</sup> Century.

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<sup>4</sup> Twyford Station Conservation Area (2013), available at: <https://www.wokingham.gov.uk/planning/how-to-apply-for-planning-permission/listed-buildings-heritage-and-conservation-areas/>

### 3. Strategic Environmental Assessment

3.1. The Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations) require the undertaking of an environmental assessment for all plans and programmes that are likely to give rise to significant environmental effects.

3.2. A neighbourhood plan falls under criterion (a) of Regulation 5(2), being a plan that is prepared for town and country planning or land use purposes, as set out below:

*(2) The description is a plan or programme which—*

*(a) is prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, and*

3.3. However, for a plan or programme to be deemed relevant under SEA Regulation 5(2), it must also be consistent with sub-paragraph (b):

*(b) sets the framework for future development consent of projects listed in Annex I or II to Council Directive 85/337/EEC on the assessment of the effects of certain public and private projects on the environment, as amended by Council Directive 97/11/EC(1).*

3.4. In respect of sub-paragraph (b) the Twyford Neighbourhood Plan will supplement existing policy within the Core Strategy and MDD local plans, providing further guidance on development in Twyford Parish. The Neighbourhood Plan is unlikely to relate to any of the uses listed under Annex I or II of EC Directive 85/337/EEC as amended by Directive 97/11/EC.

3.5. Further to the above, Regulation 5(6) of the SEA Regulations indicates that an environmental assessment need not be carried out –

- a) for a plan or programme of the description set out in paragraph (2) or (3) which determines the use of a small area at local level; or
- b) for a minor modification to a plan or programme of the description set out in either of those paragraphs, unless it has been determined under regulation 9(1) that the plan, programme or modification, as the case may be, is likely to have significant environmental effects, or it is the subject of a direction under Regulation 10(3).

3.6. Before making a determination on whether a plan is likely or unlikely to have significant environmental effects, it is a requirement to take into account the criteria specified in Schedule 1 and Regulation 9 of the Regulations. Schedule 1 sets out the criteria for determining the likely significance of effects on the environment and Regulation 9 requires the council to consult the three environmental bodies: Natural England, Historic England and the Environment Agency on the assessment to determine the need for an SEA.

3.7. The National Planning Policy Framework (NPPF), at paragraph 32, advises that local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. Footnote 19 expands on this by advising that a neighbourhood plan may require SEA, but only where there are potentially significant environmental effects.

### **SEA Screening of the Twyford Neighbourhood Plan**

3.8. The screening process set out in Regulation 9 and Schedule 1 to the SEA Regulations includes two sets of characteristics for determining the likely significance of effects on the environment, as follows:

- 1) The characteristics of the Twyford Neighbourhood Plan; and
- 2) The characteristics of the effects and of the area likely to be affected.

3.9. Under each characteristic are a number of criteria against which to assess the plan. These criteria are assessed individually for the draft Twyford Neighbourhood Plan in **Table 1** below.

3.10. This report constitutes the Screening Opinion as to the need for a full SEA under Regulation 9(3) of the SEA Regulations and sets out the SEA screening process for the submitted Twyford Neighbourhood Plan (August 2022), along with the Council's reasoning as to whether an SEA for the neighbourhood plan is required or not.

3.11. Previous consultation was undertaken by the council on a provisional view with the relevant bodies, as detailed in **Section 5** of the statement. The content of the draft Twyford Neighbourhood Plan (November 2021) contained draft planning policies which, at that time, required some technical evidence that was unavailable during the initial stage of the screening process. The neighbourhood planning group included four further policies in the draft Neighbourhood Plan (April 2022) that were not subject to the provisional draft SEA screening opinion undertaken on 8<sup>th</sup> April 2022. The Council consider that given the nature and scope of the four policies (Policy TW9: Carbon Sequestration; Policy TW11: Water Infrastructure and Flood Risk; Policy TW14: First Homes Exception Sites and Policy TW19: Early Years Provision), they are unlikely to have any significant effects in the context of SEA and HRA. The Council considers that the draft plan (April 2022) and the submitted plan (August 2022) are not materially different for the purposes of the SEA and HRA, and therefore the submitted plan provides a sufficient basis for the relevant environmental bodies to determine whether or not the plan would be likely to give rise to significant environmental effects. Therefore, the Council consider that additional screening on the draft plan was unnecessary. Furthermore, the draft Twyford Neighbourhood Plan, which included the four additional policies, was subject to formal public consultation (Regulation 14), at which point, the relevant environmental bodies did not raise any further issues regarding the neighbourhood plan. This determination statement has therefore been prepared to take into account earlier consultations and responses from the relevant environmental bodies.

| <b>Table 1: Assessment of likely significance of effects on the environment</b>   |  |                                    |
|---|--|------------------------------------|
| <b>Criteria</b>   | <b>Details</b>   | <b>Likely significant effects?</b> |
| <b>1. The characteristics of plans and programmes, having regard, in particular, to –</b>   |  |                                    |
| (a) the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources; | <p>The Twyford Neighbourhood Plan would, if made, form part of the statutory development plan which guides decisions on planning applications. The Neighbourhood Plan sits within the wider planning framework set by the National Planning Policy Framework (NPPF), the Council’s adopted Core Strategy and MDD local plans and the emerging Local Plan Update. The policies within the Neighbourhood Plan are local in nature and have limited resource implications, with no land allocated for development.</p> <p>The policies within the Neighbourhood Plan primarily seek to protect valued characteristics and influence the design and character of development proposals. They do not guide where development should take place in principle through the allocation of land for specific developments.</p> | No                                 |
| (b) the degree to which the plan or programme influences other plans and programmes, include those in a hierarchy;  | The Twyford Neighbourhood Plan will be in conformity with the NPPF. The policies within the neighbourhood plan will be in general conformity with the strategic policies as set out in the adopted Core Strategy and compliment policy in the MDD.   | No                                 |

| <b>Table 1: Assessment of likely significance of effects on the environment</b>   |   |                                    |
|---|---|------------------------------------|
| <b>Criteria</b>   | <b>Details</b>  | <b>Likely significant effects?</b> |
|   | <p>The Twyford Neighbourhood Plan sets out a spatial vision and objectives solely for the neighbourhood area (Twyford Parish), but does not guide where development should take place, in principle, or designate land for particular purposes.</p> <p>The document does not set a framework for other plans and has a low level of influence on other plans or programmes within the Council's statutory development plan. It does, however, help to inform the interpretation of adopted development plan policies which requires regard to local character of the area in decisions.</p> |                                    |
| (c) the relevance of the plan or programme for the integration of environmental considerations, in particular with a view to promoting sustainable development; | <p>The Twyford Neighbourhood Plan contains policies that ensure development is suitable and appropriate for the parish of Twyford. The neighbourhood plan sets out a spatial vision and objectives solely for the neighbourhood area (Twyford Parish), but does not guide where development should take place, in principle, or designate land for particular purposes.</p> <p>The neighbourhood plan will, however, help inform the interpretation of adopted development plan policies, which requires</p>  | No                                 |

| <b>Table 1: Assessment of likely significance of effects on the environment</b>   |  |                                    |
|---|--|------------------------------------|
| <b>Criteria</b>   | <b>Details</b>   | <b>Likely significant effects?</b> |
|   | regard to the local character of the area in decisions.  |                                    |
| (d) environmental problems relevant to the plan or programme; and   | <p>The Twyford Neighbourhood Plan sets out a spatial vision and objectives solely for the neighbourhood area (Twyford Parish), but does not guide where development should take place, in principle, or designate land for particular purposes. Planning policies in the Twyford Neighbourhood Plan will aim to support sustainable development in the parish that will not adversely impact on the nature of the village.</p> <p>The neighbourhood plan will, however, help inform the interpretation of adopted development plan policies, which requires regard to the local character of the area in decisions. This is reflected in the neighbourhood plan's objectives and draft planning policies and intentions.</p> | No                                 |
| (e) the relevance of the plan or programme for the implementation of Community Legislation on the environment (for example, plans and programmes linked to waste management or water protection). | The Twyford Neighbourhood Plan seeks to ensure that, where development is acceptable in principle (in the neighbourhood plan area) under development plan policy, consideration is had to the character of an area. It does not directly address other environmental issues such as pollution, waste   | No                                 |

| <b>Table 1: Assessment of likely significance of effects on the environment</b>                                    |  |                                    |
|--|--|------------------------------------|
| <b>Criteria</b>  | <b>Details</b>   | <b>Likely significant effects?</b> |
|  | <p>or traffic, but seeks to minimise such issues through planning policy, e.g., through the implementation of traffic calming schemes and speed limit reductions.</p> <p>A provisional Habitat Regulations Assessment (HRA) Screening has been undertaken by the Council. The provisional screening opinion (Section 4) has concluded that the draft Twyford Neighbourhood Plan is unlikely to give rise to 'likely significant effects' and that the Council do not consider that an appropriate assessment is required. The provisional HRA screening opinion was subject to consultation with the environmental bodies in accordance with Regulation 105(2) of the Conservation of Habitats and Species Regulations 2017. A determination statement with the outcome, following consultation with the environmental bodies, is issued alongside the submitted Twyford Neighbourhood Plan.</p> |                                    |
| <b>2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to –</b> |  |                                    |
| (a) the probability, duration, frequency and reversibility of the effects;   | The Twyford Neighbourhood Plan supplements policy within the adopted Core Strategy and the MDD, providing further guidance on the requirements for   | No                                 |

| <b>Table 1: Assessment of likely significance of effects on the environment</b> |  |                                    |
|---|--|------------------------------------|
| <b>Criteria</b>   | <b>Details</b>   | <b>Likely significant effects?</b> |
|   | development in the designated Neighbourhood Plan area. The Twyford Neighbourhood Plan does not allocate any sites for housing/commercial development within the parish. It is extremely unlikely that the plan's implementation will generate likely significant effects. This is because any sites where a planning application is submitted, which falls within the Neighbourhood Plan area, and where the Twyford Neighbourhood Plan is applied, will only be acceptable to the Council where environmental effects do not arise or can be appropriately mitigated. The neighbourhood plan will, however, help inform the interpretation of adopted development plan policies, which requires regard to the local character of the area in decisions. |                                    |
| (b) the cumulative nature of the effects;                                       | The Twyford Neighbourhood Plan would be a material consideration when deciding on planning applications within the neighbourhood plan area. The neighbourhood plan will, however, help inform the interpretation of adopted development plan policies, and having regard to the local character of the area in decisions.  | No                                 |
| (c) the trans-boundary nature of the effects;                                   | The Twyford Neighbourhood Plan sets out a spatial vision and objectives solely for the   | No                                 |



| <b>Table 1: Assessment of likely significance of effects on the environment</b>   |   |                                    |
|---|---|------------------------------------|
| <b>Criteria</b>   | <b>Details</b>  | <b>Likely significant effects?</b> |
|   | <p>neighbourhood area (Twyford Parish), but does not guide where development should take place, in principle, or designate land for particular purposes.</p> <p>The document does not therefore promote or support development that might have an effect on other Member States and is therefore unlikely to have trans-boundary effects.</p> <p>The approach within the Twyford Neighbourhood Plan does not affect how the Council would consider applications with respect of these issues.</p> |                                    |
| (d) the risks to human health or the environment (for example, due to accidents); | <p>The Twyford Neighbourhood Plan sets out a spatial vision and objectives solely for the neighbourhood area (Twyford Parish), but does not guide where development should take place, in principle, or designate land for particular purposes.</p> <p>The policies in the Twyford Neighbourhood Plan will help inform the interpretation of adopted development plan policies, which requires regard to the local character of the area in decisions and are not likely to lead to</p>           | No                                 |

| <b>Table 1: Assessment of likely significance of effects on the environment</b>   |  |                                    |
|---|--|------------------------------------|
| <b>Criteria</b>   | <b>Details</b>   | <b>Likely significant effects?</b> |
|   | increased risks to human health or the environment.  |                                    |
| (e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);   | The Twyford Neighbourhood Plan sets out planning policies solely for the neighbourhood plan area (Twyford Parish). The neighbourhood plan will provide local detail to supplement policies in the adopted Core Strategy and MDD local plans. The plan does not allocate any sites for development. The neighbourhood plan will, however, help inform the interpretation of adopted development plan policies, which requires regard to the local character of the area in decisions. | No                                 |
| (f) the value and vulnerability of the area likely to be affected due to –<br>(i) special natural characteristics or cultural heritage;<br>(ii) exceeded environmental quality standards or limit values; or<br>(iii) intensive land-use; and | Twyford Parish has a number of characteristics, notably: <ul style="list-style-type: none"> <li>• Undeveloped agricultural land</li> <li>• Two Conservation Areas (Twyford Village; Twyford Station)</li> <li>• Several listed buildings, notably the Grade II listed building at St Mary’s Church as well as the Grade II* listed building at the Almshouse.</li> <li>• A village centre comprising retail, commercial and service uses</li> </ul>                                  | No                                 |

**Table 1: Assessment of likely significance of effects on the environment**

| Criteria | Details   | Likely significant effects? |
|----------|---|-----------------------------|
|          | <p>The Twyford Neighbourhood Plan sets out a spatial vision and objectives solely for the neighbourhood area (Twyford Parish), but does not guide where development should take place, in principle, or designate land for particular purposes.</p> <p>The document does not therefore promote or support development that might affect areas of recognised national or international importance. The neighbourhood plan will, however, inform the interpretation of adopted development plan policies, which requires regard to the local character of the area in decisions.</p> <p>A key objective of the neighbourhood plan is to conserve and enhance features of historical and cultural interest through design and character. Policies within the neighbourhood plan will be supported by evidence, such as a design code for the neighbourhood area. A policy is also proposed in the Twyford Neighbourhood Plan to identify a list of 'Buildings of Traditional Local Character' supported by local evidence.</p> |                             |

**Table 1: Assessment of likely significance of effects on the environment**

| Criteria | Details  | Likely significant effects? |
|----------|--|-----------------------------|
|          | <p>Chiltern Beechwoods SAC is located within approx. 9km north-east from its nearest point. Both Thursley, Ash, Pirbright and Chobham SAC and Windsor Forest and Great Park SAC are located within approx. 11km to 17km of the neighbourhood plan area to the south-east and east of their respective nearest points.</p> <p>There are no Sites of Special Scientific Interest (SSSI) in the plan area, although there are some SSSIs located in proximity to the parish of Twyford, notably the Lodge Wood and Sandford Mill SSSI, which is approximately 1km south from its nearest point. Harpsden Wood SSSI is also just over the border of Wokingham Borough and into South Oxfordshire District, around 3km north-west from its nearest point. Great Thrift Wood, another SSSI, is just over the border into the Royal Borough of Windsor and Maidenhead and is approximately 7km east from its nearest point.</p> <p>There are a number of Biodiversity Action Plan (BAP) habitats within the plan area. Whilst these are not referred to in the SEA directive, they should be a consideration in</p> |                             |

| <b>Table 1: Assessment of likely significance of effects on the environment</b>   |   |                                    |
|---|---|------------------------------------|
| <b>Criteria</b>   | <b>Details</b>  | <b>Likely significant effects?</b> |
|   | plan-making. BAP priority habitats are those that were identified as being the most threatened and requiring conservation action under the UK Biodiversity Action Plan (UK BAP).  |                                    |
| (g) the effects on areas or landscapes which have a recognised national, European Community or international protection status. | <p>The Twyford Neighbourhood Plan sets out a spatial vision and objectives solely for the neighbourhood area (Twyford Parish), but does not guide where development should take place, in principle, or designate land for particular purposes.</p> <p>The document does not therefore promote or support development that might affect areas of recognised national or international importance. The neighbourhood plan will, however, inform the interpretation of adopted development plan policies, which requires regard to local character of the area in decisions.</p> <p>Regarding natural heritage, the nearest Special Protection Area (SPA) is the Thames Basin Heath SPA, located approx. 12km south at its nearest point, outside of the neighbourhood plan area. The plan area is also beyond the outermost 7km Linear Mitigation Zone for the Thames Basin Heaths</p> | No                                 |

**Table 1: Assessment of likely significance of effects on the environment**

| Criteria | Details  | Likely significant effects? |
|----------|--|-----------------------------|
|          | <p>SPA, as specified in Policy CP8 of the Core Strategy. There are no other SACs within the plan area, albeit there are some sites in relative proximity, notably Chiltern Beechwoods SAC, Thursley, Ash, Pirbright and Chobham SAC and Windsor Forest and Great Park SAC.</p> <p>There are no Sites of Special Scientific Interest (SSSI) in the plan area, although there are some SSSIs located in proximity to the parish of Twyford, notably the Lodge Wood and Sandford Mill SSSI, which is approximately 1km south from its nearest point. Harpsden Wood SSSI is also just over the border of Wokingham Borough and into South Oxfordshire District, less than 5km north-west from its nearest point. Great Thrift Wood, another SSSI, is just over the border into the Royal Borough of Windsor and Maidenhead and is approximately 7km east from its nearest point.</p> |                             |

## 4. Habitats Regulations Assessment

4.1. The European Community (EC) Directive on the conservation of natural habitats and of wild fauna and flora (92/43/ECC) (commonly known as the Habitats Directive) provides legal protection for habitats and species of European importance. The Directive is implemented in the UK by the Conservation of Habitats and Species Regulations 2017.

4.2. Articles 3-9 provide the legal means to protect habitats and species of EC interest through the establishment and conservation of a European-wide network of sites, known as The National Site Network (formerly Natura 2000 sites). The National Site Network includes Special Areas of Conservation (SAC) designated under the Habitats Directive, and Special Protection Areas (SPA) designated under the conservation of wild birds (79/409/EEC) (commonly known as the Birds Directive).

4.3. Article 6(3) and 6(4) of the Habitats Directive sets out the decision-making tests for plans and projects affecting The National Site Network. Article 6(3) establishes a requirement for an assessment as outlined below:

*“Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans and projects, shall be subject to assessment of its implications for the site in view of the site’s conservation objectives. In light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public.”*

4.4. While not European sites as a matter of law, it is national planning policy that the following sites are given the same protection as a European site:

- potential Special Protection Areas and possible Special Areas of Conservation
- listed or proposed Ramsar sites
- sites identified, or required, as compensatory measures for adverse effects on European sites, potential Special Protections Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.

4.5. The Conservation of Habitats and Species Regulations 2017 (commonly known as the Habitat Regulations) requires the assessment of land use plans. The neighbourhood plan will constitute a land use plan for the purpose of the Habitats Regulations.

4.6. Regulation 105(1) sets out that where a land use plan is likely to have a significant effect on a European site, and how the plan making authority must make an appropriate assessment of the implications for the site in view of the site’s conservation objectives.

4.7. Under Regulation 105(2), before making a determination under Regulation 105(1), the Council is required to consult Natural England as the appropriate environmental body and have regard to any representations made.

4.8. Additionally, Regulation 5(3) of the SEA Regulations indicates that an SEA could be required where:

*“The description is a plan or programme which, in view of the likely effect on sites, has been determined to require an assessment pursuant to Article 6 or 7 of the Habitats Directive.”*

4.9. This report examines the Twyford Neighbourhood Plan and:

- Identifies, through a screening process, any European site that could potentially be affected by policies in the neighbourhood plan;
- Outlines details of the nature conservation importance of any European sites ‘screened in’ to the process;
- Identifies the possible impacts that the neighbourhood plan may have on features of nature conservation importance within European sites; and
- Identifies any controls within the neighbourhood plan, and other development plan documents, strategies, policies and plans that could act to avoid or mitigate these effects.

#### **Identification of relevant international sites**

4.10. The parish of Twyford does not contain any designated international sites. The following sites are in relative proximity to the neighbourhood plan area:

- Thames Basin Heaths SPA – more than 10km
- Chiltern Beechwoods SAC – more than 5km
- Windsor Forest and Great Park SAC – more than 10km
- Thursley, Ash, Pirbright and Chobham SAC – more than 15km

4.11. Information on these sites is provided below:



| <b>Chiltern Beechwoods SAC</b> |  |
|--------------------------------|--|
| Conservation Objective:        | <p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features.</p> <p>To maintain or restore:</p> <ul style="list-style-type: none"> <li>• The extent and distribution of qualifying natural habitats and habitats of qualifying species</li> <li>• The structure and function (including typical species) of qualifying natural habitats</li> <li>• The structure and function of the habitats of qualifying species</li> <li>• The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely</li> <li>• The populations of qualifying species, and</li> <li>• The distribution of qualifying species within the site</li> </ul> |
| Qualifying Features:           | <ul style="list-style-type: none"> <li>• Semi-natural dry grasslands and scrubland facies: on calcareous substrates (<i>Festuco-Brometalia</i>); Dry grasslands and scrublands on chalk or limestone</li> <li>• <i>Asperulo-Fagetum</i> beech forests; Beech forests on neutral to rich soils</li> <li>• <i>Lucanus cervus</i>; Stag beetle</li> </ul>   |

| <b>Windsor Forest and Great Park SAC</b> |   |
|--|---|
| Conservation Objective:                  | <p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features.</p> <p>To maintain or restore:</p> <ul style="list-style-type: none"> <li>• The extent and distribution of qualifying natural habitats and habitats of qualifying species</li> <li>• The structure and function (including typical species) of qualifying natural habitats</li> <li>• The structure and function of the habitats of qualifying species</li> <li>• The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely, and</li> <li>• The distribution of qualifying species within the site</li> </ul> |
| Qualifying Features:                     | <ul style="list-style-type: none"> <li>• Old acidophilous oak woods with <i>Quercus robur</i> on sandy plains</li> <li>• Atlantic acidophilous beech forests with <i>Llex</i> and sometimes also <i>Taxus</i> in the shrub layer (<i>Quercion robori-petraeae</i> or <i>Llici-Fegenion</i>) Beech forests on acid soils</li> <li>• Violet click beetle <i>Limoniscus violaceus</i></li> </ul>   |

| <b>Thursley, Ash, Pirbright and Chobham SAC</b> |  |
|---|--|
| Conservation Objective:                         | <p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features.</p> <p>To maintain and restore:</p> <ul style="list-style-type: none"> <li>• The extent and distribution of qualifying natural habitats</li> <li>• The structure and function (including typical species) of qualifying natural habitats, and</li> <li>• The supporting processes on which qualifying natural habitats rely</li> </ul> |
| Qualifying Features:                            | <ul style="list-style-type: none"> <li>• North Atlantic wet heaths with <i>Erica tetralix</i>; Wet heathland with cross-leaved heath</li> <li>• European dry heaths</li> <li>• Depressions on peat substrates on the <i>Rhynchosporion</i></li> </ul>  |

| <b>Thames Basin Heaths Special Protection Area</b> |   |
|--|---|
| Conservation Objective:                            | <p>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> |
| Qualifying Features:                               | <ul style="list-style-type: none"> <li>• <i>Caprimulgus europaeus</i>; European nightjar (Breeding)</li> <li>• <i>Lullula arborea</i>; Woodlark (Breeding)</li> <li>• <i>Sylvia undata</i>; Dartford warbler (Breeding)</li> </ul>  |

### Screening Criteria

4.12. In carrying out this screening process, regard has been had to the main possible sources of effects on the international sites, possible pathways to the international site and the effects on possible sensitive receptors in the international sites. Only if there is an identifiable source (a pathway and a receptor) is there likely to be a significant effect.

4.13. Possible sources and pathways for effects arising from development and used in this screening are considered to be:

- Water (water pollution and hydrology)
- Air (air pollution)
- Direct land-take
- Habitat / species disturbance
- Recreational pressure (increased population)

4.14. Operations that may damage the special interest of the Thames Basins Heaths SPA, Chiltern Beechwoods SAC, the Thursley, Ash, Pirbright and Chobham SAC or the Windsor Forest and Great Park SAC are considered to be:

- Damage or removal of any plant or plant remains (including recreational impacts)
- Changes to drainage arrangements or watercourses
- Pollution of watercourses
- Water abstraction
- Extraction of materials from the site
- Dumping of materials on the site
- Storage of materials on the site
- Erection of structures on the site

### Screening of the Twyford Neighbourhood Plan

4.15. The Twyford Neighbourhood Plan has been analysed to assess whether it would be likely to result in significant effects. The results are presented in **Table 2** below.

**Table 2: Habitats Regulations Assessment Screening assessment for the Twyford Neighbourhood Plan**

| Operation   | Potential impact from the Twyford Neighbourhood Plan | Mitigating factors and comments  | Likelihood of significant effect |
|---|--|--|----------------------------------|
| <p>Damage or removal of any plant or plant remains (including recreational impacts)</p> | <p>None</p>  | <p>The Twyford Neighbourhood Plan does not steer development towards an international site, therefore it does not increase any potential for increased damaged to the site through either construction or recreational activities.</p> <p>The Council, in consultation with Natural England, has formed the view that any net increase in residential development between 400m and 5km straight line distance from the Thames Basin Heath Special Protection Area (SPA) is likely to have a significant effect on the integrity of the SPA, either alone or in combination with other plan or projects.</p> <p>The HRA for the Core Strategy and MDD local plans considered the overall level of development across the Borough. Therefore, it has already been determined (and impact avoidance and reduction measures established to allow) that there will be no likely significant effects on the integrity of the Thames Basin Heaths SPA.</p> <p>The neighbourhood plan area is also located outside the Thames Basin Heaths SPA and linear mitigation zones as defined in Policy CP8 of the adopted Core Strategy (2010) for this particular site.</p> <p>Furthermore, the neighbourhood plan does not propose development that would have an effect on existing features of habitat or conservation value, but solely defines the existing features of value in the neighbourhood plan area.</p> | <p>No</p>                        |

| Operation  | Potential impact from the Twyford Neighbourhood Plan | Mitigating factors and comments   | Likelihood of significant effect |
|--|--|---|----------------------------------|
| Changes to drainage arrangements or watercourses | None   | The Twyford NDP does not change existing drainage arrangements or watercourses.   | No                               |
| Pollution of watercourses                        | None   | The Twyford NDP does not increase any potential for pollution of watercourses.  | No                               |
| Water abstraction                                | None   | The Twyford NDP does not increase any potential for water abstraction.  | No                               |
| Extraction of materials from the site            | None   | <p>The Twyford Neighbourhood Plan does not address the need or suitability of extraction operations.</p> <p>The Replacement Minerals Local Plan for Berkshire (incorporating alterations adopted in December 1997 and May 2001) specifically guides minerals extraction. The emerging Central and Eastern Berkshire Joint Minerals and Waste Plan will guide long term mineral extraction and waste management across the plan area.</p>  | No                               |
| Dumping of materials on the site                 | None   | <p>The Twyford Neighbourhood Plan does not steer development towards an international site, therefore it does not increase any potential for the dumping of materials.</p> <p>The adopted Core Strategy (2010) sets out the spatial vision for the borough. The Thames Basin Heaths Special Protection Area (SPA) and Linear Mitigation Zones are located outside the neighbourhood plan area.</p> <p>Three sites of Special Area of Conservation (SAC): Chiltern Beechwoods SAC (within the Royal Borough of Windsor and Maidenhead) is located approximately 9km north-</p> | No                               |

| Operation                          | Potential impact from the Twyford Neighbourhood Plan | Mitigating factors and comments  | Likelihood of significant effect |
|------------------------------------|--|--|----------------------------------|
|                                    |  | east from its nearest point, the Thursley, Ash, Pirbright and Chobham SAC (within Surrey County) and the Windsor Forest and Great Park SAC (within the Royal Borough of Windsor and Maidenhead) are both located approximately 11km to 17km south-east and east at their respective nearest point.   |                                  |
| Storage of materials on the site   | None   | <p>The Twyford Neighbourhood Plan does not steer development towards an international site, therefore it does not increase any potential for increased damage to the site through the storage of materials.</p> <p>The adopted Core Strategy (2010) sets out the spatial vision for the borough. The Thames Basin Heaths Special Protection Area (SPA) and Linear Mitigation Zones are located outside the neighbourhood plan area.</p> <p>Three sites of Special Area of Conservation (SAC): Chiltern Beechwoods SAC (within the Royal Borough of Windsor and Maidenhead) is located approximately 9km north-east from its nearest point, the Thursley, Ash, Pirbright and Chobham SAC (within Surrey County) and the Windsor Forest and Great Park SAC (within the Royal Borough of Windsor and Maidenhead) are both located approximately 11km to 17km south-east and east at their respective nearest point.</p> | No                               |
| Erection of structures on the site | None   | <p>The Twyford Neighbourhood Plan does not steer development towards an international site, therefore it does not increase any potential for the erection of structures on the site.</p> <p>The adopted Core Strategy (2010) sets out the spatial vision for the borough. The Thames Basin Heaths Special Protection Area (SPA) and Linear Mitigation Zones are located outside the neighbourhood plan area.</p>   | No                               |

| Operation | Potential impact from the Twyford Neighbourhood Plan | Mitigating factors and comments  | Likelihood of significant effect |
|-----------|--|--|----------------------------------|
|           |  | <p>Three sites of Special Area of Conservation (SAC): Chiltern Beechwoods SAC (within the Royal Borough of Windsor and Maidenhead) is located approximately 9km north-east from its nearest point, the Thursley, Ash, Pirbright and Chobham SAC (within Surrey County) and the Windsor Forest and Great Park SAC (within the Royal Borough of Windsor and Maidenhead) are both located approximately 11km to 17km south-east and east at their respective nearest point.</p> |                                  |

4.16. This conclusion does not factor in any measures contained within the Neighbourhood Plan intended to avoid or reduce the harmful effects of the plan, and is therefore consistent with the Court of Justice of the European Union (CJEU) judgement '*People over Wind, Peter Sweetman v Coillte Teoranta*' (April 2018). This concerns a judgement by the Court, which held that Article 6(3) of the Habitats Directive requires that measures intended to avoid or reduce the harmful effects of a plan or project on a European Protected Site should not be taken into consideration at the screening stage.

#### *In Combination Effects*

- 4.17. The Habitat Regulations require the consideration of significant effects of a plan or programme arising from in combination effects with other plans or programmes. It can be considered that this will fall into two categories: those effects associated with regional strategic plans and proposals and those relating to more localised effects.
- 4.18. The revoked South East Plan (apart from NRM6: Thames Basin Heaths SPA) considered in-combination effects of the region's projects and plans at a strategic level and therefore regionally strategic plans are not considered further. As regards other plans within the borough, or in neighbouring authorities, these will have been individually assessed through the plan-making process for the adopted Core Strategy and MDD local plans respectively.
- 4.19. As detailed above, no likelihood of significant effects of the Twyford Neighbourhood Plan have been found following a screening opinion. The Twyford Neighbourhood Plan does not propose development that would have an effect on existing features of habitats or conservation and solely defines what features are valuable in the neighbourhood plan area. Furthermore, given the narrow scope of the neighbourhood plan (the Parish of Twyford) and the controls in place in other plans, it is unlikely that in-combination effects would arise.
- 4.20. It is noted that the content of the draft Twyford Neighbourhood Plan (November 2021) that was subject to the provisional screening consultation from 8<sup>th</sup> April to 20<sup>th</sup> May 2022 contained some draft planning policies which, at that time, required some technical evidence that was unavailable during the initial stage of the screening process. The neighbourhood planning group included four further policies in the draft Neighbourhood Plan (April 2022) that were not subject to the provisional draft SEA screening opinion. The Council consider that given the nature and scope of the four policies (Policy TW9: Carbon Sequestration; Policy TW11: Water Infrastructure and Flood Risk; Policy TW14: First Homes Exception Sites and Policy TW19: Early Years Provision), they were unlikely to have any significant effects in the context of SEA and HRA. The Council consider that the draft plan (April 2022) and the submitted plan (August 2022) are not materially different, and therefore the submitted plan provides a sufficient basis for the relevant environmental bodies to determine whether or not the plan would be likely to give rise to significant environmental effects<sup>5</sup>.

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<sup>5</sup> Locality (2018) Neighbourhood Planning: Screening neighbourhood plans for Strategic Environmental Assessment – A toolkit for neighbourhood planners, page 13, available at:



4.21. Additional screening on the draft plan was therefore not necessary. Furthermore, the draft Twyford Neighbourhood Plan was subject to formal public consultation (Regulation 14), at which point, the relevant environmental bodies did not raise any further issues regarding the neighbourhood plan. This determination statement has therefore been prepared taken into account earlier consultations and responses from the relevant environmental bodies.

## 5. Consultation with Statutory Bodies

- 5.1. Under regulation 9(2) of the SEA Regulations, the Council has a duty to consult with specified environmental organisations (Natural England, Historic England and the Environment Agency) before determining whether or not a plan or programme is likely to have significant effects. It also has a duty to prepare a statement of its reasons for this determination.
- 5.2. Under Regulation 11(1), a provisional draft screening opinion was undertaken from 8<sup>th</sup> April 2022 to 20<sup>th</sup> May 2022 for five weeks with the following organisations requesting their opinion.
- The Historic Buildings and Monuments Commission for England (Historic England);
  - Natural England; and
  - The Environment Agency.
- 5.3. The Council received responses from Natural England and the Environment Agency.
- 5.4. Natural England concluded that the draft neighbourhood plan would be unlikely to have any significant effects and therefore there is no requirement for further assessment of impacts under the SEA or HRA regulations.
- 5.5. Historic England concluded that, at this stage, the draft plan would be unlikely to have any likely significant effects that merit completion of an SEA, as the plan did not propose to allocate any sites for development.
- 5.6. The Environment Agency were unable to resource a review of the plan.
- 5.7. Full responses from the provisional draft screening opinion with the relevant environmental bodies can be found in **Appendix 1**.

## 6. Conclusions

- 6.1. Following consultation with the specific environmental bodies through the screening opinion and taking into account earlier consultations, the Council considers that, having taken account of the Environmental Assessment of Plans and Programmes Regulations 2004, the submitted Twyford Neighbourhood Plan (August 2022) is unlikely to have significant environmental effects and therefore a Strategic Environmental Assessment is not required.
- 6.2. In addition, the council also considers that the submitted Twyford Neighbourhood Plan (August 2022) is unlikely to have significant effects on The National Sites Network (formerly Natura 2000 sites), either alone or in-combination with other plans or projects, therefore an Appropriate Assessment, in the context of HRA, for the Twyford NDP is not required.
- 6.3. The Twyford Neighbourhood Plan will supplement the policies within the Council's adopted Core Strategy and Managing Development Delivery local plans with respect to the parish of Twyford.

## Appendix 1: Statutory Body Responses

### Ben Davis

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**From:** Winter, Edward <[REDACTED]>  
**Sent:** 24 March 2022 10:55  
**To:** Ben Davis  
**Subject:** RE: SEA/HRA Provisional Screening Opinion Consultation - Draft Twyford Neighbourhood Plan

#### External Email

**CAUTION: This is an EXTERNAL EMAIL - STOP & THINK before clicking a link or opening attachments.**

Dear Mr Davis

Thank you for consulting Historic England on the SEA/HRA Screening Opinion Consultation - Draft Twyford Neighbourhood Plan.

As you will be aware, matters concerning HRA fall outside our remit and therefore our comments only apply to the SEA element of this consultation.

Historic England agrees with the Council's opinion that a full SEA is not required for this plan. This is because it is not anticipated that the neighbourhood plan will allocate any sites for development.

Kind regards

**Edward Winter LLB MA MRTPI**  
Historic Environment Planning Adviser  
Regions Group (London & South East)  
Historic England, Floor 4, The Atrium, Cannon Bridge House, 25 Dowgate Hill, London, EC4R 2YA  
07557 831241



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**Ben Davis**

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**From:** Osborne, Eleanor <[REDACTED]>  
**Sent:** 29 March 2022 10:58  
**To:** Ben Davis  
**Subject:** RE: 2022-04-07 385045 Wokingham BC - Draft Twyford Neighbourhood Plan - SEA/HRA Provisional Screening Opinion

**External Email**

**CAUTION: This is an EXTERNAL EMAIL - STOP & THINK before clicking a link or opening attachments.**

Dear Ben,

Thank you for your consultation on the Draft Twyford Neighbourhood Plan's SEA/HRA screening. Natural England are in agreement with the conclusions of the screening, that a SEA and HRA are not required.

Kind Regards,

Eleanor Osborne | Lead Adviser  
Sustainable Development | Thames Solent Team  
**Natural England**

Please note I work part time Monday to Wednesday

<https://www.gov.uk/natural-england>

