

Strategic Environmental Assessment (SEA) Screening Opinion
for
Highgate School Supplementary Planning Document (SPD)

Prepared by:
London Borough of Haringey

As consulted on with:
Historic England, Environment Agency and Natural England

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1. Introduction

- 1.1. Highgate School Supplementary Planning Document (SPD) may require a Strategic Environmental Assessment (SEA) to comply with European Directive 2001/42/EC “on the assessment of the effects of certain plans and programmes on the environment”. The European Directive is transposed into law by the Environmental Assessment of Plans and Programmes Regulations 2004.
- 1.2. Section 19 of the Planning and Compulsory Purchase Act 2004 also requires a local planning authority to carry out a Sustainability Appraisal (SA) of proposals in a plan during its preparation. SAs incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004.
- 1.3. Under Article 3(3) and 3(4) of the SEA Directive, SEA is required for plans and programmes which “determine the use of small areas at a local level” or which only propose “minor modifications to plans” to plans and programmes, and which would otherwise require SEA, only where they are determined to be likely to have significant environmental effects.
- 1.4. National Planning Practice Guidance (NPPG) provides guidance on SEA/SA for SPDs. It advises that SPDs do not require SA where potential affects “already have been assessed during the preparation of the Local Plan”. It advises that “SEA is unlikely to be required where an SPD deals only with a small area at a local level... unless it is considered that there are likely to be significant environmental effects”. Further “Before deciding whether significant environmental effects are likely, the local planning authority should take into account the criteria specified in schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004 and consult the consultation bodies”. The criteria in Schedule 1 are set out in section 3 of this report.
- 1.5. The Highgate School SPD will be capable of being a material consideration in the assessment of future planning applications within the Highgate School Estate grounds. It is the Council’s responsibility to identify whether an SEA should be undertaken.
- 1.6. The screening process is based upon consideration of standard criteria of Annex II of the Directive to determine whether the plans are likely to have “significant environmental effects”. The result of the local planning authority’s screening process is detailed in this screening statement.
- 1.7. The Highgate School SPD has been screened to consider whether a SEA is required. Should guidance within the documents change, the screening opinion of the borough could also change.
- 1.8. The screening determination also includes the views of the statutory consultation bodies Historic England, Natural England and the Environment Agency. Their correspondence can be found within the report Appendix.

- 1.9. This screening determination has been undertaken by the London Borough of Haringey. The borough has determined that the plans are unlikely to have significant environmental effects. A SEA therefore should not be undertaken.

2. Purpose of Highgate School SPD

- 2.1. Highgate School SPD does not introduce new policy but is capable of being a material consideration in planning decisions. The purpose of the SPD is to support existing planning policy already set out in the adopted Local Plan.
- 2.2. The National Planning Policy Framework (NPPF) issued by the Government in February 2019 requires local planning authorities to set out in their Local Plan a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. Pursuant to this requirement, SPDs provide a framework for creating distinctive places, with a consistent and high-quality standard of design. However their level of detail and degree of prescription should be tailored to the circumstances in each place, and should allow a suitable degree of variety where this would be justified.
- 2.3. Haringey's Local Plan policies relating to delivery of high quality design in developments are SP11 in Haringey's Strategic Policies (2017), which sets out the Council's intention to ensure that design in the borough is of the highest possible quality as well as being sustainable whilst conserving the borough's rich and diverse heritage, and DM1 Delivering High Quality Design, in Haringey's Development Management DPD (2017), which sets out Council's commitment to design excellence, and requires that the Council has regard to the 'Haringey Development Charter' which poses a set of questions to all new development to demonstrate their detailed understanding and appreciation of the site's context and to robustly justify their design rationale. The Local Plan documents were the subject of Sustainability Appraisals incorporating the requirements of SEA.
- 2.4. In addition to the above, Haringey's Site Allocations DPD (2017) requires development within Highgate School site to be in accordance with a future SPD which will provide a comprehensive approach to the effective planning and delivery of new accommodation to meet the long term needs of the school and supporting enhanced community use and benefits. The SPD is to focus on creating improved management and quality of provision including new buildings. The Site Allocations DPD forms part of the adopted Haringey's Local Plan documents which were the subject of Sustainability Appraisals.
- 2.5. An adopted Highgate School SPD provides a sound basis for implementing the Council's approved development plan policies relating to design, conservation and sustainability, and will support development management decisions. The SPD is for use by Highgate School to manage future developments within their Estate grounds, and is publicly available for local residents, community groups, businesses, architects and developers within the surrounding areas. The Council will use the SPD in the assessment of relevant development proposals within Highgate School

grounds, and the Planning Inspectorate will take the document into account in the event of any planning appeals.

2.6. The Highgate School SPD has been prepared in accordance with the requirements of Part 5 of The Town and Country Planning (Local Planning) (England) Regulations 2012 and having regard to the National Planning Policy Framework (2019) (paragraph 126). A brief structure of the of the documents is set out below:

- **Relationship between Highgate School and the Community:** provides a background history of the School, its relationship with local community, and the significance of its historic buildings to the surrounding local character of the area. Then summarise how these have been taken into consideration in the masterplanning of the Estate contained in this SPD.
- **Characteristics of the Site:** provides a description of the overall site context and character of the entire SPD Area, and a discussion on the current issues and challenges facing the School including site constraints and operational issues.
- **Planning Policy Context:** outlines the planning policy context that applies to Highgate School Estate which has been taken into consideration in developing the emerging proposals in this SPD.
- **Highgate School Masterplan:** sets out the School's proposals that are required to meet its educational needs for the current and future pupils and staff.
- **Design Criteria:** sets out the general design and development principles to which future proposals should seek to adhere.
- **Implementation and Monitoring:** sets out the delivery and timescale of phasing for proposed developments.

3. Assessment

3.1. The “responsible authority” must determine whether the plan or programme, in this case the Highgate School Supplementary Planning Document, is likely to have significant environmental effects with reference to the criteria specified in Schedule 1 of the Regulations.

3.2. These criteria are set out in the table below, along with consideration of the likely impact of the Highgate School SPD against each.

SEA Directive criteria	Comments	Likely Significant Effects?
Characteristics of plans and programmes, having regard, in particular to:		
1a) The degree to which the plan or programme sets a	The SPD only acts as guidance to positively manage growth and developments within the Highgate School Estate grounds, ensuring that	No

framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources	<p>they deliver high-quality and sustainable developments whilst contributing to the distinctive character and amenity of the local area.</p> <p>The SPD identifies key principles and design considerations for future developments; however these are only considerations to take into account and there are no development proposals submitted to the Council seeking approval to take these forward. The SPD aims to appropriately manage the future developments on Highgate School landholding, ensuring that development will not occur in a way that would adversely affect the historic character and amenity of the local area. This will have the effect of limiting the type and design of development that will occur within the Highgate School grounds, however this is primarily achieved through the use of Local Plan policies to which this SPD gives further guidance, and which have been the subject of SA.</p>	
1b) The degree to which the plan or programme influences other plans and programmes including those in a hierarchy	The Highgate School SPD is supplementary to the relevant Local Plan policies as guidance, which were the subject of Sustainability Appraisals. With regard to these policies, the SPD will only act to manage future developments within the Highgate School Estate grounds which constitute a small part of the Borough. It is considered the extent of impact is unlikely to be significant in this regard.	No
1c) The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development	<p>The Highgate School SPD is planned to have a positive impact on local environmental assets. The SPD does not introduce new policy however is supplementary to higher up adopted policies that will ensure future developments within the Highgate School Estate grounds integrate environmental considerations with a view to promoting sustainable development.</p> <p>It will give guidance to promote the use of public transport, walking and cycling by pupils and staff in accordance to the relevant London Plan and Haringey's Local Plan policies which have been the subject of Sustainability Appraisals. These contribute to the promotion of sustainable development on site; however any effect will occur only at local level and will not have significant environmental effects.</p>	No
1d) Environmental problems relevant to the plan or programme	The Council believes that there will be no significant environmental problems resulting from the Highgate School SPD. The SPD applies to relatively small, localised areas that are already	No

	<p>well developed. The document will seek to preserve or enhance the current historic and natural environment of the area, such as the Highgate Conservation Area and the designated Metropolitan Open Land located within the site, as they will restrict and manage development that could be harmful to these assets to a degree. The SPD will identify possible opportunities for enhancement.</p> <p>The SPD is supplementary to the London Plan and Haringey's Local Plan policies, which include policies relating to Metropolitan Open Land, for which wider environmental problems have already been appraised and were the subject of Sustainability Appraisals.</p>	
1e) The relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste-management or water protection).	The SPD is not directly relevant to the implementation of community legislation on the environment.	No
Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:		
2a) The probability, duration, frequency and reversibility of the effects	<p>The SPD covers a small area of Highgate in the London Borough of Haringey, which is already well developed. Localised impacts of developments on the townscape are intended to be beneficial, but if not then should be of a relatively small scale and thus reversible in the short to medium term.</p> <p>The SPD is supplementary to Local Plan policies for which wider significance of effects have already been appraised.</p>	No
2b) The cumulative nature of the effects	The SPD will not result in major changes or actions in the area affected. Therefore, there will be no significant cumulative effects. The plan seeks to appropriately manage future developments within the Highgate School Estate grounds having regard to the historic character and nature of the area.	No

	The SPD is supplementary to Local Plan policies for which cumulative effects have already been appraised.	
2c) The trans-boundary nature of the effects	<p>There are no trans-boundary effects arising from the SPD.</p> <p>The SPD is supplementary to Local Plan policies for which trans-boundary effects have already been appraised.</p>	No
2d) The risks to human health or the environment (e.g. due to accidents)	<p>There are unlikely to be risks to human health or the environment arising from the SPD in respect of this criterion.</p> <p>The SPD is supplementary to Local Plan policies for which wider human health and environment risks have already been appraised.</p>	No
2e) The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)	<p>The Highgate School SPD covers a small area of Highgate in the London Borough of Haringey. Both the size of the area and population are not considered significant.</p> <p>The SPD is supplementary to Local Plan policies for which wider spatial effects have already been appraised.</p>	No
2f) The value and vulnerability of the area likely to be affected due to: i) special natural characteristics or cultural heritage ii) exceeded environmental quality standards or limit values iii) intensive land-use	<p>The Highgate School SPD will help ensure future developments within the Highgate School Estate grounds contribute positively to the natural characteristics and cultural heritage, but these will only be in a localised area and will not be significant.</p> <p>As the SPD does not propose any development works within sites or sites adjacent to, internationally designated sites, Sites of Special Scientific Interest, Local Nature Reserves, Sites of Importance for Nature Conservation or Ecological Corridors, it is unlikely that there will be any effects on European Protected Species. The SPD seeks to appropriately manage development to ensure protection of the character of the area.</p> <p>The SPD will have positive or neutral effects on environmental quality standards. This is because they will ensure developments preserve or enhance the setting of the statutorily listed and locally listed buildings, the appearance of the Highgate Conservation Area and to relate to the designated Metropolitan Open Land (MOL) and its openness. It also seeks to establish Zero Carbon developments and to be at least Air Quality Neutral on all new developments across</p>	No

	<p>the Estate grounds. It is therefore unlikely that any works or actions included in the SPD will affect environmental quality standards.</p> <p>The SPD does not include or add any site allocations for development and will not lead to intensive land-use.</p> <p>The Highgate School SPD is supplementary to Local Plan policies for which natural characteristics, cultural heritage and environmental quality standards have already been appraised.</p>	
2g) The effects on areas or landscapes which have a recognised national, Community or international protection status	<p>There are no landscapes of national or international protection status in the SPD Area.</p> <p>There are two landscapes of recognised Metropolitan importance in the areas and which the SPD may have an impact on. These are Highgate School Playing Fields and Highgate School Sports Ground, which are designated Metropolitan Open Land. The SPD seeks for any developments affecting these areas to preserve its openness and do not conflict with the purposes of including land within it, which in this case is for outdoor sports or recreational purposes.</p> <p>However, as the SPD is guidance for preserving these protected assets which will be further assessed at the detailed planning application stage, there will be no significant environmental effects upon them.</p> <p>The SPD is supplementary to Local Plan policies for which wider protections have already been appraised.</p>	No

4. Screening outcome

4.1. Having reviewed the Highgate School SPD against the above criteria, it is concluded that it is not likely to have significant environmental effects and accordingly, should not be subject to Strategic Environmental Assessment.

4.2. This determination was subject to consultation with the statutory consultation bodies. The consultation bodies specified in the Environmental Assessment of Plans and Programmes Regulations 2004 consulted on this screening determination are:

- Historic England;
- Environment Agency; and

- Natural England

Appendix 1: Consultation Responses

Environment Agency

Thank you for consulting us on the draft SEA screening report for the above SPD.

Based on a review of environmental constraints for which we are a statutory consultee, there are no areas of fluvial flood risk, Source Protection Zones for groundwater or watercourses affected by the SPD area. Therefore we do not consider there to be potential significant environmental effects relating to these environmental constraints.

Your Surface Water Management Plan will indicate if there are any critical drainage areas from local sources of flood risk (e.g. surface water, groundwater and sewerage) which coincide with the SPD area.

For your information we have published joint advice with Natural England, English Heritage and the Forestry Commission on neighbourhood planning which sets out sources of environmental information and ideas on incorporating the environment into plans.

This is available at:

http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/lit_6524_7da381.pdf.

Natural England

Thank you for your consultation request on the above dated and received by Natural England on 18th November 2020.

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. Natural England has no comment to make on this consultation.

Historic England

We note the Council's Screening Opinion and the conclusion that the proposed SPD does not give rise to significant environmental effects sufficient to require full SEA. In respect of the potential impacts on the Historic Environment we are content with the Council's analysis and that the policies are in conformity to National and Local Policy, and should lead to positive impacts in respect of the Historic Environment.

To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, where Historic England consider it appropriate to do so.