

WANDSWORTH

Habitats Regulations Assessment

Local Plan Partial Review
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January 2025





Habitat Regulations Assessment (HRA) – Screening Report

Wandsworth Local Plan Partial Review (LPPR)

January 2025

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1. Introduction

- 1.1. Under European legislation, Wandsworth Council is required to undertake a Habitat Regulations Assessment (HRA) on local development planning documents and projects. HRA assesses the likely impacts of a plan's policies on the integrity of the Natura 2000 sites (also known as European sites). The purpose of the HRA is to ensure that the protection of the integrity of European sites is part of the planning process.
- 1.2. For the purposes of this HRA Screening Report, the proposal is a plan, which sets out future activities or development in the London Borough of Wandsworth.
- 1.3. This Screening Report will check if the plan (the Local Plan Partial Review or LPPR) is likely to have a significant effect on European Sites' conservation objectives. If it does not, the Council do not need to progress to the Appropriate Assessment Stage.
- 1.4. The Council is currently preparing a partial review¹ of the Local Plan² (which was adopted in July 2023). The review will update Policy LP23 Affordable Housing as set out in the Wandsworth Local Plan (2023 – 2038) and other policies as they relate to strengthening provision of homes for social rent for local people, together with any other consequential changes necessary for consistency. The three main ambitions of the partial review are as follows;
 - To strengthen the Local Plan policy by setting out a clear policy requirement for new housing developments in the borough to provide at least 50% of dwellings as affordable homes delivered on site;
 - A greater proportion of all new homes to be genuinely affordable, preferably a 70:30 split in favour of social rent; and
 - To require affordable housing from small sites below the current threshold of 10 or more homes (gross).

There is no increase in overall housing delivery (or other development) anticipated as a result of the Local Plan Partial Review – only a change to the mix of housing delivered, including an increase in the proportion of affordable housing tenures of the total homes delivered.

- 1.5. The purpose of this report is to review the initial Stage 1 of the HRA process (screening) which was carried out at the Regulation 18 stage³ to establish whether or not the

¹ <https://www.wandsworth.gov.uk/planning-and-building-control/planning-policy/local-plan/local-plan-partial-review/>

² https://www.wandsworth.gov.uk/media/large/adopted_local_plan.pdf

³ https://www.wandsworth.gov.uk/media/lpejujdf/local_plan_partial_review_habitat_screening_assessment.pdf

proposed policy changes that form the Local Plan Partial Review (LPPR) are likely to have a significant effect on Natura 2000 sites and, if so, whether an Appropriate Assessment is required (stage 2 of the HRA).

- 1.6. This document forms part of the evidence base for the Local Plan Partial Review (LPPR). While it is independent of the Sustainability Appraisal (SA), results of an HRA screening exercise can help inform the SA process. A previous HRA screening assessment on the adopted Local Plan 2023 was prepared, and this concluded that the Local Plan was not likely to result in significant effects or impacts on the integrity of any Natura 2000/European Site.
- 1.7. In undertaking this review, the findings of the London Plan HRA⁴ have also been considered as part of the wider context. The London Plan HRA identifies that the London Plan does not have any impact pathways that could interact with Richmond Park SAC in a way which could prevent it achieving its conservation objectives for the protected species Stag Beetle. For Wimbledon Common SAC, it the London Plan HRA does not consider the scale of growth proposed for Merton, Kingston and Wandsworth in the London Plan likely to result in a significant pressure on this site.
- 1.8. The scope of the LPPR is extremely limited in comparison to the entire adopted Wandsworth Local Plan. For this reason, the assessment and narrative in this report is limited relative to the previous HRA screening report prepared for the Local Plan.

Context – Regulation 18 Stage

- 1.9. The Regulation 18 HRA⁵ did not identify any likely significant effects or impacts on the integrity of any European Site. The 2018 Integrated Impact Assessment⁶ identified that only Wimbledon Common SAC and Richmond Park SAC needed to be considered in the HRA screening exercise and other European Sites within 15km could be descoped.
- 1.10. The Regulation 18 HRA examined the impacts of the proposed policy changes on the scoped European Sites (Wimbledon Common SAC and Richmond Park SAC) and the policy changes were deemed to fall under Category A – no negative effects.

⁴ https://www.london.gov.uk/sites/default/files/draft_hra_report.pdf

⁵ https://www.wandsworth.gov.uk/media/lpejujdf/local_plan_partial_review_habitat_screening_assessment.pdf

⁶ https://www.wandsworth.gov.uk/media/3509/integrated_impact_assessment_scoping_report.pdf

- 1.11. The LPPR does not exist in isolation, and at the Regulation 18 stage, an in-combination assessment was undertaken whereby neighboring boroughs' HRA's were reviewed. It was found there would be no in-combination effects on the integrity of the two sites.
- 1.12. Natural England did not respond to the Regulation 18 consultation to comment on this version of the HRA. However, Wandsworth Borough Council officers met with Natural England in June 2024 as part of the Council's Duty to Co-operate engagement with key statutory bodies. At this stage, Natural England advised the Council to make sure the wording in the HRA is as consistent with the Regulations as possible, and to ensure any mitigation is discussed at the Appropriate Assessment stage of the HRA rather than the screening stage.
- 1.13. Natural England also raised [recent case law](#) which outlined that mitigation measures should not be assessed through a HRA to 'screen out impacts when considering Likely Significant Effects (LSE)'. Rather, avoidance/mitigation measures are proposed to avoid a likely significant effect.
- 1.14. This version of the HRA (Regulation 19) has taken into account the feedback from Natural England.

Context – Wandsworth Local Plan (2023)

- 1.15. The majority of the policies in the Wandsworth Local Plan have already been determined as having no impact on European Sites when they were adopted in 2023.
- 1.16. This HRA is largely based on the outputs of the adopted Local Plan HRA⁷. This is considered an appropriate approach due to the following reasons;
- Limited scope of the partial review – the LPPR proposes updates to just six Local Plan policies out of the entire local plan. The Council do not consider this to be a substantial enough change to justify the commissioning of a new evidence base to support the HRA for the partial review.
 - The recent nature of the full local plan adoption – The Wandsworth Local Plan was adopted in July 2023 and sets out policies and guidance for the borough over the plan period to 2038. It is not considered that the evidence for the adopted Local Plan is out of date just over a year post-adoption.
 - The LPPR will not have an impact on allocated sites, and the proposed updates are not considered to have implications on other areas of the Local Plan which impinge on habitats and the protection of habitats. There are no new sites

⁷ https://www.wandsworth.gov.uk/media/10140/habitat_regulations_assessment_january_2022.pdf

allocated for development as part of the partial review which limits opportunities for the proposals to negatively impact habitats.

- The evidence used for the HRA must be proportionate – PAS guidance sets out that production of plans with disproportionate and unfocussed amounts of evidence can lead to confusion, delay and increased costs at plan making stage and increased time at examination⁸. Due to the reasons above in combination with the need for proportionate evidence, it is considered that the same evidence is still appropriate for use in the partial review. For the same reasons, it is considered that to commission an updated evidence base would be disproportionate for the review of six prevailing local plan policies with no direct impact on sites allocated for development.

1.17. The January 2022 HRA concluded that the screening analysis of the Local Plan found that all policies were deemed to fall under Category A – no negative effects, and it was considered that the Appropriate Assessment stage was not required. The Council sought the views of Natural England during the Regulation 19 consultation period on this document. Natural England were satisfied that specific matters raised at the Regulation 18 Stage had been addressed, and stated they had no further comment to make at Regulation 19 stage.

2. Habitat Regulations Assessment

2.1. The Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Flora and Fauna - the 'Habitats Directive' - provides legal protection for habitats and species of European importance. Article 2 of the Directive requires the maintenance or restoration of habitats and species of interest to the EU in a favourable condition. This is implemented through a network of protected areas - Natura 2000 or European sites. Articles 6(3) and 6(4) of the Habitats Directive require an Appropriate Assessment of plans and projects likely to have a significant effect on a European site. The requirement for HRA in England is set down in the Conservation (Natural Habitats, & c) Regulations, 1994 in England and Wales, amended in 2007 and consolidated into the Conservation of Habitats and Species (Amendment) Regulations 2012 (SI No. 212/1927). This means that the effects of the LPPR on Natura 2000 sites need to be assessed to ensure that their integrity is maintained.

⁸ <https://www.local.gov.uk/pas/plans/evidence-base/evidence-plan-making-focus-upon-proportionality-february-2020#:~:text=The%20appropriate%20focus%20and%20detail%20of%20evidence%20required%20to%20support>

- 2.2. Paragraph 3, Article 6 of the Habitats Directive states that:
- ‘Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site’s conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to paragraph 43, the competent national authority shall agree to the plan or project only having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public’.
- 2.3. There are two types of Natura 2000 sites – Special Area of Conservation (SAC) and Special Protection Area (SPA). RAMSAR (Convention on Wetlands of International Importance) sites and Sites of Community Importance (SCI) are also given equivalent status. SAC sites are important for their habitat features; SPA sites are important for bird populations; RAMSAR sites are internationally important wetlands; and SCIs are sites that have been adopted by the European Commission but not yet formally designated as SACs.

3. Methodology

- 3.1. The Habitats Regulations process involves the following steps:
- i. Screening: assessing likely significant impacts
 - ii. Scoping an Appropriate Assessment (AA);
 - iii. Appropriate Assessment (AA);
 - iv. Adding avoidance/mitigation measures;
 - v. Formal consultation; and
 - vi. Recording the assessment.
- 3.2. Steps 1 and 2 are reported in this document. If the screening stage concludes that significant effects are likely on European sites, either alone or in combination with other plans, then a full Appropriate Assessment (Step 3) is required.
- 3.3. Article 6 (3) and (4) of the Habitats Directive sets out the requirement for assessment in order to determine whether the plan is ‘likely to have a significant effect’ on a European site. This is the screening stage of the process and determines whether further steps need to be taken. The Department of Communities and Local Government guidance⁹ states the following:

⁹ Communities and Local Government (2006) “Planning for the Protection of European Sites.” Consultation Paper

“The comprehensiveness of the assessment work undertaken should be proportionate to the geographical scope of the option and the nature and extent of any effects identified. The assessment should be confined to the effects on the internationally important habitats and species for which the site is classified. An AA need not be done in any more detail, or using more resources, than is useful for its purpose.”

3.4. This assessment of the Local Plan Partial Review, under the Habitats Regulations, was undertaken during the preparation of the LPPR, so that the assessment could influence the development of policies and their effects.

4. Determining Proximity to European Sites

4.1. One European site lies partly within the borough (Wimbledon Common SAC) and one adjacent to the borough boundary (Richmond Park SAC). Consideration was given to include sites within a wider catchment area of 15km from the Wandsworth boundary. Using this catchment, the following European sites were identified:

- Wimbledon Common (SAC)
- Richmond Paek (SAC)
- Epping Forest (SAC)
- Lee Valley (SPA & RAMSAR site)
- South West London Waterbodies (SPA & RAMSAR site)

4.2. However, the Integrated Impact Assessment of the Wandsworth Local Plan Revised Scoping Report (December 2018) concluded that only Wimbledon Common SAC and Richmond Park SAC should be considered in the HRA screening exercise. The descopeing of the other European sites from the HRA was justified as follows:

- Epping Forest (SAC) - The Wandsworth Local Plan Habitats Regulations Assessment (April 2015) did not identify an impact pathway between activities resulting from the previous Wandsworth Local Plan (as adopted in 2016) and the SAC. It was not considered that residents would specifically travel to it for recreation and it was not thought the Wandsworth Local Plan would have any impact on the nitrogen pollution levels for this site given the distance from the borough. Given the similarities between the extant Local Plan and coverage of the Local Plan Partial Review, the justification for this site being scoped out of the HRA remains valid.
- Lee Valley (SPA & RAMSAR site) - The Wandsworth Local Plan Habitats Regulations Assessment (April 2015) did not identify an impact pathway between activities resulting from the previous Wandsworth Local Plan (as adopted in 2016) and the SPA / RAMSAR site. The 2015 HRA Report states: “[More local wetland areas to the borough] are considered to be more likely recreational destinations for residents of the borough than the South West London Waterbodies or Lee Valley for those taking part in water sports and other water-based recreation and those interested in visiting wetland habitats.” It was also not considered likely that the Wandsworth Local Plan would have any impact on the nitrogen pollution levels for this site given the distance from the borough. Given the similarities between the extant Local Plan and coverage of the Local Plan Partial Review, the justification for this site being scoped out of the HRA remains valid.
- South West London Waterbodies (SPA & RAMSAR site) - The Wandsworth Local Plan Habitats Regulations Assessment (April 2015) did not identify an impact pathway between activities resulting from the previous Wandsworth Local Plan (as adopted in 2016) and the SPA / RAMSAR site. The 2015 HRA Report states:

“[More local wetland areas to the borough] are considered to be more likely recreational destinations for residents of the borough than the South West London Waterbodies or Lee Valley for those taking part in water sports and other water-based recreation and those interested in visiting wetland habitats.” It was also not considered likely that the Wandsworth Local Plan would have any impact on the nitrogen pollution levels for this site given the distance from the borough. Given the similarities between the extant Local Plan and coverage of the Local Plan Partial Review, the justification for this site being scoped out of the HRA remains valid.

- 4.3. Therefore, this report considers whether the scope of the LPPR, in itself or in combination with other plans, will adversely affect the integrity of Wimbledon Common and/or Richmond Park SACs.
- 4.4. Information for Wimbledon Common and Richmond Park, including the rationale for their declaration as European sites, was taken from the draft London Plan Habitats Regulations Assessment Screening (November 2017). This also includes supplementary information to assist in the assessment of the significance of any impacts of policies on their nature conservation interest as identified in the Integrated Impact Assessment of the Wandsworth Local Plan Revised Scoping Report (December 2018). This is presented in Appendix A and B.

5. Types of Impact - Screening

5.1. Understanding the various pathways that a land use plan can affect European sites is important. Pathways are routes by which a change in activity within Wandsworth borough can lead to an effect upon a European site. With regard to the category of European site for Wimbledon Common and Richmond Park, Government guidance establishes that the Appropriate Assessment (AA) should be 'proportionate to the geographical scope of the [plan policy]' and that 'an AA need not be done in any more detail, or using more resources, than is useful for its purpose' (CLG, 2006, p.68). As a result, there are screening limits for the Natura 2000 sites. The focus being on those for which recommended mitigation or alternatives to policy can contribute significantly towards the protection of those sites (i.e. Wimbledon Common and Richmond Park) and their nature conservation objectives (as outlined in Appendix A A and B).

5.2. There is no anticipated increase in overall housing delivery (or other development) as a result of the proposed policy updates. As such, the results of the January 2022 HRA are still relevant for the partial review. However, the proposed policy updates have been evaluated against the pathways that a land use plan can potentially impact European Sites.

5.3. The types of impact (pathways) that require consideration are:

- Recreational causes
- Urbanisation
- Impacts on surrounding habitat
- Atmospheric Pollution
- Water Resources
- Water Quality

Policy LP23 – Affordable Housing

5.4. The policy changes aim to increase the proportion of affordable housing delivered on new development sites, including small sites of 10 units or less (through financial contributions).

5.5. Terrestrial European Sites can be adversely affected by recreational causes such as walkers and runners (causing soil compaction and erosion), mountain biking, motorbike scrambling and other recreational uses. Because there is no anticipated increase in overall housing delivered, an increase in affordable housing tenures is

unlikely to have any impact with regards to recreational causes beyond what was identified in the January 2022 HRA¹⁰.

- 5.6. The impacts for urbanisation are closely linked to those for recreational. In this case, it is not considered that the proposed changes to LP23 will have any impact on urbanisation causes beyond what was identified in the January 2022 HRA¹¹.
- 5.7. It is unlikely that the proposed amendments to affordable housing policy LP23 will have an impact on atmospheric pollution because there are no anticipated increases in traffic flows, intensification of agriculture or industrial processes requiring the combustion of coal and oil arising from the amendments.
- 5.8. The proposed policy changes are unlikely to have any impact on Water Resources because there is no anticipated increase in overall housing delivery arising from the policy proposals – an increase in a particular tenure type is unlikely to have any impact on water resources. Similarly, the proposals are highly unlikely to have any negative impact on water quality – wastewater is treated at the Crossness Treatment Plant and discharged into the Thames. The treatment plant is located east of Wimbledon Common and Richmond Park avoiding any potential pathway with them.
- 5.9. The proposed amendments to policy LP23 will not themselves lead to development because they relate to other qualitative criteria for development. As such, it is considered they will have no impact on European Sites beyond any identified in the 2022 HRA.

Policy LP24 – Housing Mix

- 5.10. The policy changes aim to slightly amend the housing mix that is delivered in new residential schemes. The proposed policy updates will not result in the delivery of any additional housing, only influence the housing mix that is delivered.
- 5.11. It is considered that the proposed changes to policy LP24 will have no negative impact on European Sites beyond which was identified in the 2022 HRA because the policy itself will not lead to development.

Policy LP28 – Purpose Built Student Housing

- 5.12. The policy changes aim to prioritise the delivery of conventional housing over purpose-built student housing. The proposed policy updates will not result in the delivery of any additional purpose-built student housing.

¹⁰ https://www.wandsworth.gov.uk/media/10140/habitat_regulations_assessment_january_2022.pdf

¹¹ https://www.wandsworth.gov.uk/media/10140/habitat_regulations_assessment_january_2022.pdf

5.13. It is not anticipated that the proposed amendments to Policy LP28 will have any impact on European Sites beyond any identified in the 2022 HRA because the policy relates to other qualitative criteria for development, rather than leading to development itself.

Policy LP29 – Housing with Shared Facilities

5.14. The proposed policy changes update the wording of Policy LP29 to ensure consistency with the updated policy LP23 – Affordable Housing. No other material changes are proposed to this policy, and as such it is considered that it is unlikely for the policy proposals to have an impact on European Sites beyond any identified in the 2022 HRA.

Policy LP30 – Built to Rent

5.15. The proposed policy changes update the wording of Policy LP30 to ensure consistency with the updated policy LP23 – Affordable Housing. No other material changes are proposed to this policy, and as such it is considered that it is unlikely for the policy proposals to have an impact on European Sites beyond any identified in the 2022 HRA.

Policy LP31 – Specialist Housing for Vulnerable People and Older People

5.16. The proposed policy changes update the wording of Policy LP31 to ensure consistency with the updated policy LP23 – Affordable Housing. No other material changes are proposed to this policy, and as such it is considered that it is unlikely for the policy proposals to have an impact on European Sites beyond any identified in the 2022 HRA.

6. Screening Analysis

6.1. The proposed policies that have resulted from the LPPR have each been assessed against the adapted criteria in Table 1 below. This sets out four categories of potential effects as:

- **Category A:** elements of the plan / options that would have **no negative effect** on a European site at all.
- **Category B:** elements of the plan / options that could have an effect, but the likelihood is there would be **no significant negative effect** on a European site either alone or in combination with other elements of the same plan, or other plans or projects.
- **Category C:** elements of the plan / options that could or would be likely to have a **significant effect** alone and will require the plan to be subject to an appropriate assessment before the plan may be adopted;
- **Category D:** elements of the plan / options that would be likely to have a **significant effect in combination** with other elements of the same plan, or other plans or projects and will require the plan to be subject to an appropriate assessment before the plan may be adopted.

6.2. Categories A, C and D are further subdivided and more detail is provided in Table 1.

Table 1 Criteria to assist in determining adverse effects on European Sites

Category	Ref	Explanation
A: No negative effect	A1	Policies that will not themselves lead to development e.g. because they relate to design or other qualitative criteria for development, or they are not a land use planning policy.
	A2	Policies intended to protect the natural environment, including biodiversity.
	A3	Policies intended to conserve/enhance the natural/built/historic environment, where enhancement measures will not be likely to have any negative effect on a European Site.
	A4	Policies that positively steer development away from European sites and associated sensitive areas.
	A5	Policies that would have no effect because no development could occur through the policy itself, the development being implemented through later policies in the same plan, which are more specific and therefore more appropriate to assess for their effects on European Sites and associated sensitive areas.
B: No Significant effect	B	Effects are trivial or 'de minimis', even if combined with other effects
C: Significant effect alone	C1	The option, policy or proposal could directly affect a European site because it provides for, or steers, a quantity or type of development onto a European site, or adjacent to it

Category	Ref	Explanation
	C2	The option, policy or proposal could indirectly affect a European site e.g. because it provides for, or steers, a quantity or type of development that may be very close to it, or ecologically, hydrologically or physically connected to it or it may increase disturbance as a result of increased recreational pressures
	C3	Proposals for a magnitude of development that, no matter where it was located, the development would be likely to have a significant effect on a European site
	C4	An option, or policy that makes provision for a quantity / type of development (and may indicate one or more broad locations e.g. a particular part of the plan area), but the effects are uncertain because the detailed location of the development is to be selected following consideration of options in a later, more specific plan. The consideration of options in the later plan will assess potential effects on European Sites, but because the development could possibly affect a European site a significant effect cannot be ruled out on the basis of objective information
	C5	Options, policies or proposals for developments or infrastructure projects that could block options or alternatives for the provision of other development or projects in the future, that will be required in the public interest, that may lead to adverse effects on European sites, which would otherwise be avoided
	C6	Options, policies or proposals which depend on how the policies etc. are implemented in due course, for example, through the development management process. There is a theoretical possibility that if implemented in one or more particular ways, the proposal could possibly have a significant effect on a European site
	C7	Any other options, policies or proposals that would be vulnerable to failure under the Habitats Regulations at project assessment stage; to include them in the plan would be regarded by the EC as ‘faulty planning’
	C8	Any other proposal that may have an adverse effect on a European site, which might try to pass the tests of the Habitats Regulations at project assessment stage by arguing that the plan provides the imperative reasons of overriding public interest to justify its consent despite a negative assessment
D: Significant effect in combination	D1	The option/policy/proposal alone would not be likely to have significant effects but if its effects are combined with the effects of other policies/proposals provided for or coordinated by the LDD (internally), cumulative effects would be likely to be significant
	D2	Options, policies or proposals that alone would not be likely to have significant effects but if their effects are combined with the effects of other plans or projects, and possibly the effects of other developments provided for in the LDD as well, the combined effects would be likely to be significant

Category	Ref	Explanation
	D3	Options or proposals that are, or could be, part of a program or sequence of development delivered over a period, where the implementation of the early stages would not have a significant effect on European sites, but which would dictate the nature, scale, duration, location, timing of the whole project, the later stages of which could have an adverse effect on such sites

6.3. Table 2 provides an assessment of the LPPR policies against the criteria presented in Table 1 above. This shows that the LPPR policies will have no adverse impact on Wimbledon Common and Richmond Park SACs. Consequently, there are no essential recommendations made.

Table 2 Assessment Outcomes of LPPR Policies

Policy		Likely to have an impact	Reason(s)	Essential recommendations to avoid adverse effect
LP23	Affordable Housing	No	A1, A5	None
LP24	Housing Mix	No	A1, A5	None
LP28	Purpose-Built Student Housing	No	A1, A5	None
LP29	Housing with Shared Facilities	No	A1, A5	None
LP30	Build to Rent	No	A1, A5	None
LP31	Specialist Housing for Vulnerable People and for Older People	No	A1, A5	None

In Combination Effects

6.4. The assessment has not identified any significant adverse effects arising from the LPPR policies alone. However, Wandsworth does not sit in isolation and consideration should be made of the potential for effects in combination with any other proposal planned or underway and affects the same site that on its own also does not have a significant effect. Greater London Authority Plan Habitats Regulations Assessment Modifications Update (December 2019) has been reviewed. This established for Richmond Park SAC:

“The London Plan does not have any impact pathways that could interact with the SAC in a manner that would prevent it achieving its conservation objectives for stag beetle.”

6.5. And for Wimbledon Common SAC:

“The scale of growth proposed for Merton, Kingston and Wandsworth in the London Plan is not likely to result in a significant recreational pressure effect on Wimbledon Common SAC alone or in combination with other plans and projects...The Mayor’s air quality policies in the draft London Plan, The Mayor’s Transport Strategy and the London Environment Strategy will improve air quality ...even allowing for growth in population and jobs, as will the specific major transport initiatives associated with the growth area around Wimbledon [and] does not result in adverse effects upon European designated sites, either alone or in combination. Rather, it will play a crucially important part in improving air quality.”

6.6. Critically, the HRA Modifications Update concluded:

“It is...considered that there are sufficient protective mechanisms in place to ensure that the growth objectives of the London Plan can be delivered without an adverse effect on the integrity of European sites, either alone or in combination with other plans and projects.”

6.7. Available HRAs for the local plans of neighboring boroughs were reviewed as part of the HRA accompanying the adopted 2023 Wandsworth Local Plan.

6.8. All of these assessments found that their local plans will not have an adverse impact on the European Sites. Based on the scope of the LPPR policies, and those in other authority areas, it can be concluded that there will be no likely significant 'in-combination' effects resulting from the LPPR, and as such an appropriate assessment is not required.

7. Conclusion

- 7.1. This screening assessment of the LPPR has not identified any likely significant effects or impacts on the integrity of any European Site. This is largely down to the fact that the proposed policy amendments are not anticipated to result in the delivery of any additional housing (or other development) beyond that identified in the 2022 HRA for the Full Local Plan. In determining this, the methodology was followed as set out in section 3.
- 7.2. The identification of European Sites within 15km is a standard that has previously been agreed with Natural England as the distance at which pathways of impact may be likely to occur. The sites which fall within 15km of the Wandsworth borough boundary (either wholly or in part) are Wimbledon Common (SAC), Richmond Park (SAC), Epping Forest (SAC), Lee Valley (SPA & RAMSAR site) and South West London Waterbodies (SPA & RAMSAR site).
- 7.3. The Integrated Impact Assessment of the Wandsworth Local Plan Revised Scoping Report (December 2018) concluded that Wimbledon Common SAC and Richmond Park SAC should be considered in the HRA screening exercise and the other sites could be descoped. The justification for descoping other sites is considered to remain valid.
- 7.4. The assessment reviewed the reasons for the scoped sites' designation and identified key vulnerabilities. These are summarised in Table 3.

Table 3 Key Features and vulnerabilities of Scoped European Sites

Site	Features of Interest	Key Vulnerabilities
Wimbledon Common SAC	European dry heath North Atlantic wet heaths with <i>Erica tetralix</i> Stag Beetle <i>Lucanus cervus</i>	Recreational pressures Air pollution
Richmond Park SAC	Atlantic acidophilous beech forests with Ilex and sometimes also <i>Taxus</i> in the shrub layer (<i>Quercion roburipetraeae</i> or <i>Illici-Fagenion</i>) Stag Beetle <i>Lucanus cervus</i>	Recreational pressures Air pollution

- 7.5. Pathways of impact were identified and assessed. Potential pathways include recreational causes, urbanisation, impacts on surrounding habitat, atmospheric pollution, water resources and water quality.

7.6. The screening assessment has found that the LPPR, and the six policies proposed, is unlikely to have adverse effects on the European Sites or their integrity. A summary of the potential pathways is provided in Table 4 below.

Table 4 Potential Pathways to European Sites

Potential Pathway to Cause Adverse Effect – Yes/No?	Explanation
Recreational - No	<p>Wandsworth Borough has a number of open spaces (existing and proposed) available much more locally to the majority of residents than the European Sites.</p> <p>The scale of development resulting from the LPPR is unlikely to significantly increase recreational pressure in Richmond Park.</p>
Urbanisation and on Surrounding Habitats - No	<p>Development resulting from the LPPR is unlikely to result in adverse impacts on the integrity of the sites.</p>
Atmospheric Pollution – No	<p>Policy will not affect air quality.</p>
Water Resources and Water Quality - No	<p>Wastewater is treated at the Crossness Treatment Plant and discharged into the Thames. The Thames Tideway Tunnel will manage wastewater effectively in the medium term.</p> <p>Environment Agency’s Review of Consents (whereby new abstraction licenses may not be granted if they will harm a European Site)</p> <p>80% of public water supply for London comes from storage reservoirs connected to the River Thames and River Lee, with the remaining 20% coming from groundwater supplies of the confined chalk aquifer.</p>

7.7. The screening analysis of the LPPR involved examining each policy’s significant effects on the European sites against established criteria. Each policy was deemed to fall under Category A - no negative effects.

7.8. To reiterate, the objectives of the partial review were;

- To strengthen the Local Plan policy by setting out a clear policy requirement for new housing developments in the borough to provide at least 50% of dwellings as affordable homes delivered on site;
- A greater proportion of all new homes to be genuinely affordable, preferably a 70:30 split in favour of social rent; and
- To require affordable housing from small sites below the current threshold of 10 or more homes (gross).

7.9. The outcomes of this HRA demonstrate that The Council is able to meet the objectives of the LPPR without significantly harming the designated features of a European Site, specifically Richmond Park SAC and Wimbledon Common SAC.

7.10. The outcomes of this HRA are the same as those arising from the January 2022 HRA, meaning the proposed policy changes do not cause further detriment to habitats than the existing policies which were found to be unlikely to cause an impact, and did not require mitigation. The Council do not consider the LPPR to propose significant changes to policy to justify a departure from the findings of the previous HRA, and so consider the findings of the screening exercise robust. Justification for not commissioning an updated evidence base is detailed in paragraph 1.6.

7.11. Recognising that the LPPR does not exist in isolation, an in-combination assessment was also undertaken. Neighbouring boroughs' HRAs were reviewed including the HRA on the London Plan. Taking these into account, it is considered there will be no in-combination effects on the integrity of the two scoped sites for this screening assessment.

7.12. In summary, this screening assessment on the LPPR has not identified any significant adverse effects on any Natura 2000 site; particularly Wimbledon Common SAC or Richmond Park SAC. Similarly, the LPPR will not have an adverse impact on the integrity of these. Consequently, it is not necessary to undertake an Appropriate Assessment.

7.13. The Council will seek the views of Natural England on the conclusion of this initial HRA screening assessment as part of the Regulation 19 Statutory Consultation on the LPPR.

8. Appendix A

Wimbledon Common SAC

Designation Reason

Annex I habitats:

- Northern Atlantic wet heaths with *Erica tetralix*
- European dry heaths

Annex II species:

- Stag Beetle *Lucanus cervus*

Conservation Objectives

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, by maintaining or restoring the:

- Extent and distribution of qualifying natural habitats and habitats of qualifying species.
- Structure and function (including typical species) of qualifying natural habitats.
- Structure and function of the habitats of qualifying species.
- Supporting processes on which qualifying natural habitats and the habitats of qualifying species rely.
- Populations of qualifying species.
- Distribution of qualifying species within the site.

Factors Affecting Integrity and Current Pressures

- Atmospheric pollution (nutrient deposition and acidification).
- Air pollution is also thought to be having an impact on the quality of heathland habitat.
- Water quality - e.g. pollution through groundwater and surface run-off sources
- Water level - maintenance of water table
- Habitat fragmentation
- Scrub encroachment
- Spread of non-native / invasive species (specifically oak processionary moth *Thaumetopoea processionea*)
- Intensive recreational pressure that can result in damage, particularly to the sensitive areas of heathland.
- Inappropriate behaviour by some visitors (e.g. collection and removal of dead wood)

9. Appendix B

Richmond Park SAC

Designation Reason

Annex I habitats:

- Atlantic acidophilous beech forests with Ilex and sometimes also Taxus in the shrub layer (Quercion roboripetraeae or Ilici-Fagenion) (primary)
- Northern Atlantic wet heaths with Erica tetralix (secondary)
- European dry heaths (secondary)

Annex II species:

- Stag Beetle *Lucanus cervus*

Conservation Objectives

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, by maintaining or restoring the:

- Extent and distribution of qualifying natural habitats and habitats of qualifying species.
- Structure and function of the habitats of qualifying species.
- Supporting processes on which the habitats of qualifying species rely
- Populations of qualifying species.
- Distribution of qualifying species within the site.

Factors Affecting Integrity and Current Pressures

- Atmospheric pollution (e.g. nitrous oxides from vehicle exhausts).
- Air pollution is also thought to be having an impact on the quality of heathland habitat.
- Water quality - nutrient enrichment from fertiliser run-off, etc.
- Water level - maintenance of water table
- Habitat fragmentation
- Scrub encroachment (often due to under grazing)
- Development pressure
- Spread of non-native / invasive species
- Intensive recreational pressure that can result in damage, particularly to the sensitive areas of heathland.
- Inappropriate behaviour by some visitors and human disturbance (off-road vehicles, burning, vandalism).

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