WANDSWORTH

Habitats Regulations Assessment

Local Plan Publication (Regulation 19) Version
(with Post Hearing Main Modifications) January 2023

THE BRIGHTER BOROUGH
Wandsworth

CONTENTS

1. INTRODUCTION

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. The Council is currently preparing a new Local Plan to replace the adopted Local Plan made up of the Core Strategy (adopted March 2016), Development Management Policies Document (DMPD) (adopted March 2016), Site Specific Allocations Document (SSAD) (adopted March 2016)[1] and Local Plan Employment and Industry Document (LPEID) (adopted December 2018).

2. The purpose of this report is to undertake an initial Stage 1 of the HRA process (screening) to establish whether or not the policies included within the Draft Wandsworth Local Plan (Publication version with Main Modifications) 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).This document has subsequently been reviewed and updated based on the discussions undertaken at the Examination hearing sessions and the main modifications which emerged from them, which follows consultation on the previous Regulation 19 version. The Government's Procedure Guide for Local Plan Examinations requires that all main modifications are subject to HRA (and sustainability appraisal) where necessary[2].

3. 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 emerging Local Plan on Natura 2000 sites need to be assessed to ensure that their integrity is maintained.

4. 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 4[3], the competent*

[1] Wandsworth Local Plan Habitats Regulations Assessment (April 2015) was undertaken in association with these local planning documents.
[2] Procedure Guide for Local Plan Examinations - GOV.UK (www.gov.uk)
[3] Paragraph 4, Article 6 of the Habitats Directive states that: *'If, in spite of a negative assessment of the implications for the site and in the absence of alternative solutions, a plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of social or economic nature, the Member State shall take all compensatory measures to ensure that the overall coherence of Natura 2000 is protected. It shall inform the Commission of the compensatory measures adopted.'*

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'.

5. 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.

6. This document forms part of the evidence base for the Local Plan. While it is independent of the Sustainability Appraisal (SA), results of this screening exercise will feed into the SA for the Local Plan . A previous HRA screening assessment on the adopted Local Plan 2015 was prepared that concluded that the Local Plan was not likely to result in significant effects or impact on the integrity of any Natura 2000/European Site. The Regulation 19 version of the report also concluded that the screening assessment of the Local Plan – Publication version has not identified any likely significant effects or impacts on the integrity of any European Site. The Local Plan – Publication version with Main Modifications propose some revisions to policy. These, by their nature, are relatively minor at this stage of the plan-making process and predominantly concern changes around tall buildings, housing provision and industrial land.

These changes have been assessed as having no impact as described in this assessment.

2. METHODOLOGY

7. The Habitats Regulations process involves the following steps:

   I. Screening: assessing likely significant effects;
   II. Scoping an appropriate assessment;
   III. Appropriate Assessment (AA);
   IV. Adding avoidance/mitigation measures;
   V. Formal consultation; and
   VI. Recording the assessment.

8. 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.

9. 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 guidance[4] states the following:

   "The comprehensiveness of the assessment work undertaken should be proportionate to the geographical scope of the option and the nature and

[4] Communities and Local Government (2006) "Planning for the Protection of European Sites." Consultation Paper

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."

10. This assessment of the Local Plan – Publication version with Main Modifications, under the Habitats Regulations, was undertaken during the preparation of theMain Modifications so that the assessment could influence the development of policies and their effects.

3. PROXIMITY TO EUROPEAN SITES

11. 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 Park (SAC)
    - Epping Forest (SAC)
    - Lee Valley (SPA & RAMSAR site)
    - South West London Waterbodies (SPA & RAMSAR site)

12. 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 descoping 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 current 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 reviews, this site is scoped out of the HRA.

    - 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 current 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 reviews, this site is scoped out of the HRA.

    - 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 current 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 reviews, this site is scoped out of the HRA.

13. Hence, this report considers whether the policies of the Local Plan – Publication version with Main Modifications, in themselves, or in combination with other plans, will adversely affect the integrity of Wimbledon Common and/or Richmond Park SACs.

4. SITE DESCRIPTIONS

14. 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 below.

15. 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)

16. 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 undergrazing)

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)

5. IMPACT TYPES

17. 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[5] 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 Section 4).

18. The pathways that require consideration of their effects are:

    - Recreational causes
    - Urbanisation
    - Impacts on surrounding habitat
    - Atmospheric pollution
    - Water resources
    - Water quality

    These pathways, and the effect of the Local Plan – Publication version with Main Modifications, are discussed below.

Recreational causes

19. Terrestrial European sites can be adversely affected by recreational causes such as walkers and runners (causing soil compaction and erosion), dog walking (potentially leading to soil enrichment from dog fouling, harassment of wildlife and damaged sensitive habitats), mountain biking, motorbike scrambling, and off-road vehicle use are all capable of causing serious erosion as well as disturbance to sensitive species. Water-borne recreation can also adversely affect sensitive water bodies.

Effects of Local Plan – Publication version with Main Modifications

20. The Local Plan – Publication version with Main Modifications makes allowance for at least 1,950 net additional dwellings per year over the period to 2028/29 with allowance for further increases up to the year 2038 in accordance with the Plan period (See Policy SDS1 of the Local Plan). The population will grow to over 353,000 by 2030 and reach around 375,000 by the end of the plan period in 2038. It is considered unlikely residents of Wandsworth will travel in large numbers or frequently to Wimbledon Common or Richmond Park for recreational purposes as:

    - They are located to the western periphery of the borough meaning that many Wandsworth borough residents are unlikely to frequently travel across the borough to reach them particularly as parking is difficult for those coming from further away.

[5] Communities and Local Government (2006) "Planning for the Protection of European Sites." Consultation Paper

- Given the small number of site allocations in proximity[6], it is unlikely that there would be a significant increase in visits. Overall, compared to the number of visitors the site receives from the surrounding residential areas it is unlikely that there would be an increase in recreational visits from the housing proposed.

- Wandsworth residents have several large open spaces available locally, either within the borough or on its immediate edges (e.g. Clapham Common, Wandsworth Common, King George's Park, Putney Heath, Thames riverside, Tooting Bec Common, Wimbledon Park, Battersea Park, etc.). This encourages residents to utilise their local open space assets for recreation. Open Space in Wandsworth is accessible. This helps residents and visitors alike improve their mental and physical wellbeing. Consequently, although it is acknowledged that residents in the west of the borough (Roehampton and Putney) will use Wimbledon Common (and to a lesser extent Richmond Park), this will be proportionate to its role as serving a local need.

21. It is recognised that the Covid-19 pandemic increased pressures on open spaces. During this unprecedented period, the recreational pressures on parks and open spaces increased, particularly due to local restrictions and limited places to visit during lockdowns. This was particularly noticeable on weekends, especially in Richmond Park. In response, the Royal Parks put in place a Movement Strategy, including a trial to close many park roads to general traffic (e.g. cut-through traffic between Roehampton, Sheen and Richmond Gates). It is anticipated that post-pandemic use will return to normal levels with the value of spaces recognised. The management regimes for the SACs will support this.

22. Richmond Park is sensitive to recreational pressure and requires pro-active management. Whilst residents of Wandsworth may visit Wimbledon Common, these would be in relatively smaller numbers serving the locality. Housing growth for the borough established through the Local Plan – Publication version with Main Modifications is not thought to be significant in terms of increased recreational pressure on Wimbledon Common or Richmond Park. This establishes that capacity to accommodate 5.15% (1,334 units) of new net housing will be in Putney and Roehampton. The existing management regimes for the SACs will continue to be effective in managing impacts from this growth. The majority of new housing capacity will be in Nine Elms, Clapham Junction, Wandsworth Town and Tooting.

23. Further, Local Plan – Publication version with Main Modification policies resist the loss of recreational open space within the borough, encourage sufficient access to existing open spaces, and make provision for new space within or close to proposed areas for new housing. More generally, policy promotes local access to community services (including open space) through supporting active travel.

Urbanisation

24. While urbanisation impacts are related to those for recreational, it is discussed separately as population in an area can create anti-social effects (such as fly tipping or vandalism) and inadvertently cause conditions with damaging consequences to species, such as owning a domestic cat (predation), or causing light or noise pollution

[6] There are three, two of which are focused on the regeneration of the Alton Estate. This will retain the existing residential character.

to bird or bat species. In some response to this, Natural England, on a number of different planning applications, has identified 400m from a SPA as the distance within which they felt no new development could be allowed because of the general 'urbanisation' effects that would be experienced by the SPA.

Effects of Local Plan – Publication version with Main Modifications

25. Wimbledon Common and Richmond Park are primarily designated for their populations of Stag Beetles. Stag Beetle habitat is dependent on the availability of dead and rotting wood. This can be controlled through the management of the habitats where the beetles are found. Consequently, these populations are not likely to be impacted even when there is an increase in urbanisation pressure provided these areas are managed appropriately.

26. Two site allocations for Roehampton are close to the Richmond Park SAC. These are Alton West Intervention Areas, Roehampton, SW15 (Ref: RO1) a mixed-use regeneration area of 12.5ha about 200m from the SAC and Mount Clare, Minstead Gardens, Roehampton, SW15 (Ref: RO2) which is part of the Alton Estate proposed for residential-led mixed use. It is 1.57ha and around 330m from the SAC. Although not SPAs, the proximity of site allocations to the SACs should be considered. There are no adverse impacts from urbanisation as the designated species (Stag Beetle) has a low impact from adverse urbanisation impacts and suitable mitigation can be designed into a development proposal through supportive habitat (e.g. back gardens with rotting wood or open water habitats) should it be appropriate. In particular, enhancement of Stag Beetle habitats should be promoted for these site allocations in consultation with Natural England's Discretionary Advice Service (DAS)[7].

27. All other site allocations for regeneration, renewal and growth are greater than 400m from Wimbledon Common and Richmond Park SACs being primarily located at town centres, Nine Elms, Wandsworth's Riverside and the Wandle Valley. This is a growth pattern that follows the settlement hierarchy presenting a better option in terms of European site protection.

28. Any urbanisation impacts as a result of the Local Plan – Publication version with Main Modifications policies are unlikely to have an adverse effect on the conservation features for which the SACs are designated. Urbanisation in Wandsworth will not result in an adverse impact on the integrity of any of the sites.

Impacts on surrounding habitat

29. Related to urbanisation, impacts on surrounding habitats mostly concern the development of land close to designated areas leading to a significant adverse effect on the area's integrity. Similarly, impacts affecting species or habitat on surrounding land upon which the designated area rely can adversely affect the species or habitat.

Effects of Local Plan – Publication version with Main Modifications

30. The impacts of Local Plan – Publication version with Main Modifications policies are unlikely to have an adverse effect on the beetle species of the Wimbledon Common and Richmond Park SACs, nor are any species within Wandsworth borough, likely to have an adverse effect upon the beetles within the designated site, nor is this considered to have an adverse impact on the integrity of the sites. Wimbledon Common is also designated for its wet and dry heathland. Heathland protection and enhancement can be addressed through management practice for the Common.

31. Generally, Wandsworth borough will support populations of Stag Beetle, with back gardens being a favoured habitat as well as parks such as King George's Park. Further, the populations of Stag Beetles in areas distant from Richmond Park and Wimbledon Common are unlikely to have any relationship or bearing on the populations of the beetles in the two European sites. In addition, habitat supporting Stag Beetles in Wandsworth (parks, woodlands and larger gardens) are unlikely to be affected by

[7] Developers: get environmental advice on your planning proposals - GOV.UK (www.gov.uk)

proposed development in the Local Plan – Publication version with Main Modifications. The Local Plan to protect the recreational role and biodiversity value of private and communal parks and gardens.

Atmospheric pollution

32. While there is limited information available on the effects of air quality on semi- natural habitats, the main pollutants of concern are well understood. Oxides of Nitrogen (NOx) can have a directly toxic effect upon vegetation. NOx emissions are mainly related to vehicle exhaust.

33. Sulphur dioxide (SO_2) and Ammonia emissions (NH_3) are the other main atmospheric pollutants. SO_2 is mainly concerned with the output of coal stations and industrial processes that require the combustion of coal and oil. NH_3 emissions are influenced by agriculture. As such, it is unlikely that there will be any fundamental increase in SO_2 and NH_3 emissions associated with the Local Plan – Publication version with Main Modifications.

34. According to the World Health Organisation, the critical NOx concentration (critical threshold) for the protection of vegetation is 30μgm^{-3}. In addition, ecological studies have determined 'critical loads' of atmospheric nitrogen deposition (that is, NOx combined with ammonia NH_3) for key habitats within the European sites considered within this assessment. Wimbledon Common has NOx concentration that exceeds the critical level. The Air Pollution Information System[8] concludes that whilst the woodland habitats which Stag Beetle inhabit are vulnerable to nitrogen deposition, Stag Beetles themselves are not vulnerable to nitrogen deposition. The main reason cited is that 'nitrogen deposition is not believed to have a direct, major effect on tree growth in the UK'[9] and thus the cycle of tree growth and death should continue, as should a continued supply of dead wood.

35. The most acute impacts of NOx take place close to where they are emitted, but individual sources of pollution will also contribute to an increase in the general background levels of pollutants at a wider scale, as small amounts of NOx and other pollutants from the pollution source are dispersed more widely by the prevailing winds. Prevailing winds in Wandsworth are generally from the west[10], which would take Wandsworth's pollution away from Wimbledon Common and Richmond Park.

36. In terms of diffuse air pollution, Natural England has previously advised that effects of vehicular atmospheric emissions should be considered if roads are closer than 200m from a Nature 2000 site. The implication of this is that any long-range contribution made to 'background' concentrations of NOx or other atmospheric pollutants by the development set out in the Local Plan – Publication version with Main Modifications is outside the remit of the HRA for the Local Plan. Therefore, the issue of 'long-range' pollution need not be considered within this HRA.

Effects of Local Plan – Publication version with Main Modifications

37. Given the above on SO_2 and NH_3, it is unlikely that there will be any increase in these emissions associated with the Local Plan – Publication version with Main Modifications.

[8] http://www.apis.ac.uk/
[9] http://www.apis.ac.uk/node/965
[10] https://weatherspark.com/y/44919/Average-Weather-in-Wandsworth-United-Kingdom-Year-Round#:~:text=The%20predominant%20average%20hourly%20wind,of%2028%25%20on%20April%2018.

38. As the Local Plan – Publication version with Main Modifications seeks to accommodate 1,950 net additional dwelling units each year; it is conceivable that there may be an associated increase in vehicle use. However, the Local Plan – Publication version with Main Modifications makes clear it seeks to reduce private vehicle use and that growth will be targeted in key locations that are better served by active travel or public transport.

39. Further, Wandsworth has had the biggest drop in registered vehicles of any of the 32 London boroughs, with 33% fewer vehicles licensed in Wandsworth in 2017 than there were in 2001[11] – and a high proportion of residents use public transport. In addition, million car miles in Wandsworth dropped by 32% from 532m in 1999 to 361m in 2018[12]. The Local Plan – Publication version with Main Modifications supports public transport investment and promotes the increased use of public transport, cycling and walking which is currently 67% of trips across London (though this has been affected by the pandemic)[13]. It also requires residential developments to be car-free where access to public transport is high, restricts on-street parking for larger developments and promotes car club membership. Therefore, it is unlikely that the Local Plan – Publication version with Main Modifications will result in significant increases to NOx levels to threaten European sites which are sensitive to air pollution, such as Wimbledon Common.

40. The A3 (Kingston Road) and A219 (Wimbledon Park Side), associated residential streets to the east of the A219 and some of the roads of the Alton Estate are within 200m of the SACs. However, the policies and proposals of the Local Plan – Publication version with Main Modifications will encourage more sustainable transport that will reduce car levels on these roads. Further, site allocations require, through policy, sustainable transport provision.

41. Two site allocations for Roehampton are close to the Richmond Park SAC. These are Alton West Intervention Areas, Roehampton, SW15 (Ref: RO1) a mixed-use regeneration area of 12.5ha about 200m from the SAC and Mount Clare, Minstead Gardens, Roehampton, SW15 (Ref: RO2) which is part of the Alton Estate proposed for residential-led mixed use. It is 1.57ha and around 330m from the SAC. The proximity of these site allocations to the SACs should be considered with regards to air quality. The Local Plan – Publication version with Main Modifications requires an assessment of the impact of emissions from traffic on Richmond Park and Wimbledon Common European sites, as appropriate, from development proposals on these sites to determine air quality impacts and any mitigation required.

42. Accordingly, NOx resulting from vehicle emissions associated with Local Plan site allocations do not have any impact pathways that could interact with the SACs in a manner that would prevent them achieving their conservation objectives for Stag Beetle and need not be considered further.

Water Resources

43. London and the south east of England have been classified as areas under serious water stress. Attributable to climate change, London and south east England is expected to experience hotter, drier summers and warmer, wetter winters, and more

[11] Local Plan – Publication version with Main Modifications, para 2.6
[12] Road traffic statistics - GOV.UK (www.gov.uk)
[13] London Travel Demand Survey (LTDS) 2022

extreme weather events, including drought. In the short and medium term, it should be a priority to reduce water stress of European sites.

Effects of Local Plan – Publication version with Main Modifications

44. While the Local Plan – Publication version with Main Modifications promotes 'growing' and 'enhancing' features for Wandsworth borough, it is unlikely that any increase in development will adversely affect or impact on the integrity of the two sites for reasons pertaining to water resources. This is because 80% of public water supply for London comes from storage reservoirs connected to the River Thames and River Lea through the Thames Water Ring Main, with the remaining 20% coming from groundwater supplies of the confined chalk aquifer. Increases in water demand are unlikely to adversely affect sites or impact on their integrity due to the Environment Agency's Review of Consents (whereby new abstraction licenses may not be granted if they will harm a European Site) and that Thames Water uses pumping stations to abstract water from unused underground water springs in east London. Similarly, the Local Plan – Publication version with Main Modifications requires new development to meet high standards of sustainable design and construction and this incorporates water efficiency measures for housing.

Water quality

45. Increased amounts of development can lead to reduced water quality of rivers and estuarine environments. Sewage and industrial effluent discharges can contribute to increased nutrients on European sites leading to unfavourable conditions. In addition, diffuse pollution, partly from urban run-off has been identified during an Environment Agency Review of Consents process, as being a major factor in causing unfavourable condition of European sites.

46. The quality of the water that feeds European sites is an important determinant of the nature of their habitats and the species they support. Poor water quality can have a range of environmental impacts.

47. For sewage treatment works close to capacity, further development may increase the risk of effluent escape into aquatic environments. In many urban areas including London, sewage treatment and surface water drainage systems are combined, and therefore a predicted increase in flood and storm events could increase pollution risk. Construction of the Thames Tideway Tunnel seeks to alleviate this risk.

Effects of Local Plan – Publication version with Main Modifications

48. Any increases in wastewater resulting from policies promoting population, housing and employment growth in Wandsworth are not likely to affect the two Natura 2000 sites as 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.

49. Moreover, the 25km Thames Tideway Tunnel (TTT) will run underground from Acton storm tanks in west London, and travel roughly the line of the River Thames to Abbey Mills Pumping Station in east London. It is scheduled to be completed in 2023. The new sewer tunnel will intercept 34 existing sewage discharge points along the river, preventing pollution from spilling into the Thames and diverting it to Beckton Treatment Plant for treatment.

6. LONDON PLAN HRA

50. The HRA (2017) for the draft London Plan[14] concluded that the London Plan does not have any impact pathways that could interact with the Richmond Park SAC in a manner that would prevent it achieving its conservation objectives for Stag Beetle[15].

51. In relation to visitor pressure, it identifies Wimbledon Common as an area that could be influenced by the draft London Plan in terms of increasing the number of people accessing the site. London Plan policy H1 (Increasing housing supply) may result in increased urbanisation and demand for recreational greenspace and has the potential to impact upon Wimbledon Common SAC. It is the delivery of new housing and the associated increase in population that presents the greatest scope for potential effects on the European site. There is no reason to conclude that achieving these housing targets will have an adverse effect on the SAC as discussed in paragraphs 20-23 above. The scale of growth proposed for Wandsworth in the draft London Plan is not likely to result in a significant recreational pressure on Richmond Park or Wimbledon Common SAC alone or in combination with other plans and projects.

52. In relation to air pollution, it also states that increasing housing supply could result in increased atmospheric pollution linking to impacts upon Wimbledon Common SAC. The draft London Plan contains policies that either make reference to improving air quality in London (other than greenhouse gases which are not directly relevant to impacts on European sites), or which will improve air quality via their delivery, demonstrating a strong commitment to improve air quality across London. Whilst the aim is to improve air quality from a public health perspective, any improvement in air quality will have a positive knock-on-effect to European sites that are sensitive to atmospheric pollution. Overall, the Mayor's air quality policies in the London Plan, the Mayor's Transport Strategy and the London Environment Strategy are expected to result in a considerable net improvement in air quality over the plan period (and beyond); even allowing for growth in population and jobs.

7. SCREENING ANALYSIS

53. The Local Plan – Publication version with Main Modifications has been assessed (see Table 2) 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

[14] The London Plan was adopted in March 2021.
[15] Further updates to the HRA in respect of the emerging London Plan were carried out in 2018, 2019 and 2020.

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.

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

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.
	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'.

Category	Ref	Explanation
	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 co-ordinated 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.
	D3	Options or proposals that are, or could be, part of a programme 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.

55. Table 2 provides an assessment of the Local Plan – Publication version with Main Modifications policies against the criteria presented in Table 1 above. This shows that the policy framework of the Local Plan – Publication version with Main Modifications will have no adverse impact on Wimbledon Common and Richmond Park SACs. Consequently, there are no essential recommendations made.

Table 2: Assessment of Local Plan – Publication version policies

Policy		Likely to have an impact	Reason	Essential recommendations to avoid adverse effect
SDS1	Spatial Development Strategy	No	A5	None
PM 1	Area Strategy and Site Allocation Compliance	No	A5	None
PM 2	Wandsworth Town	No	A4 / A5	None
PM 3	Nine Elms	No	A4 / A5	None
PM 4	Clapham Junction and York Road/Winstanley Regeneration Area	No	A4 / A5	None
PM 5	Putney	No	A4 / A5	None
PM 6	Tooting	No	A4 / A5	None
PM 7	Roehampton and Alton Estate Regeneration Area	No	A4 / A5	None
PM 8	Balham	No	A4 / A5	None
PM 9	Wandsworth's Riverside	No	A4 / A5	None
PM 10	The Wandle Valley	No	A4 / A5	None
LP 1	The Design-Led Approach	No	A1	None
LP 2	General Development Principles	No	A1	None
LP 3	The Historic Environment	No	A1/A3	None
LP 4	Tall and Mid-rise Buildings	No	A1	None
LP 5	Residential Extensions and Alterations	No	A1	None

Policy		Likely to have an impact	Reason	Essential recommendations to avoid adverse effect
LP 6	Basements and Subterranean Developments	No	A1	None
LP 7	Residential Development on Small Sites	No	A1/A4	None
LP 8	Shopfronts	No	A1	None
LP 9	Advertisements	No	A1	None
LP 10	Responding to the Climate Crisis	No	A1	None
LP 11	Energy Infrastructure	No	A1	None
LP 12	Water and Flooding	No	A1	None
LP 13	Circular Economy, Recycling and Waste Management	No	A1	None
LP 14	Air Quality, Pollution and Managing Impacts of Development	No	A3	None
LP 15	Health and Wellbeing	No	A1	None
LP 16	Public Houses and bars	No	A1	None
LP 17	Social and Community Infrastructure	No	A1	None
LP 18	Arts, Culture and Entertainment	No	A1	None
LP 19	Play Space	No	A4	None
LP 20	New Open Space	No	A4	None
LP 21	Allotments and Food Growing Spaces	No	A2 / A3	None
LP 22	Utilities and Digital Connectivity Infrastructure	No	A3	None
LP 23	Affordable Housing	No	A1	None
LP 24	Housing Mix	No	A1	None
LP 25	Protecting the Existing Housing Stock	No	A1	None
LP 26	Conversions	No	A4	None
LP 27	Housing Standards	No	A1	None
LP 28	Purpose Built Student accommodation	No	A4	None
LP 29	Housing with Shared Facilities	No	A4	None
LP 30	Build to Rent	No	A4	None
LP 31	Specialist Housing for Vulnerable People and for Older People	No	A4	None
LP 32	Traveller Accommodation	No	A4	None
LP 33	Promoting and Protecting Offices	No	A4	None
LP 34	Managing Land for Industry and Distribution	No	A4	None
LP 35	Mixed Use Development on Economic Land	No	A4	None
LP 36	Railway Arches	No	A4	None
LP 37	Requirements for New Economic Development	No	A1	None
LP 38	Affordable, Flexible and Managed Workplaces	No	A1	None
LP 39	Local Training and Employment Opportunities	No	A1	None
LP 40	Protected Wharves	No	A3	None

Policy		Likely to have an impact	Reason	Essential recommendations to avoid adverse effect
LP 41	Wandsworth's Centres and Parades	No	A4	None
LP 42	Development in Centres	No	A4	None
LP 43	Out of Centre Development	No	A4	None
LP 44	Local Shops and Services	No	A4	None
LP 45	Evening and Night-Time Economy	No	A4	None
LP 46	Visitor Accommodation	No	A4	None
LP 47	Markets	No	A4	None
LP 48	Meanwhile Uses	No	A4	None
LP 49	Sustainable Transport	No	A1	None
LP 50	Transport and Development	No	A1	None
LP 51	Parking, Servicing and Car Free Development	No	A1	None
LP 52	Public Transport and Infrastructure	No	A4 / A5	None
LP 53	Protection and Enhancement of Green and Blue Infrastructure	No	A2 / A3	None
LP 54	Open Space, Sport and Recreation	No	A3	None
LP 55	Biodiversity	No	A2	None
LP 56	Tree Management and Landscaping	No	A2 / A3	None
LP 57	Urban Greening Factor	No	A2 / A3	None
LP 58	River Corridors	No	A1 / A3	None
LP 59	Riverside uses, including River-dependent, River-related and River adjacent uses	No	A1 / A3	None
LP 60	Mooring and Floating Structures	No	A1 / A3	None
LP 61	Monitoring the Local Plan	No	A1	None
LP 62	Planning Obligations	No	A1	None
LP 63	Neighbourhood Planning	No	A1	None

In combination effects

56. The assessment (Table 2) has not identified any significant adverse effects arising from the Local Plan – Publication version alone. However, Wandsworth does not sit in isolation and consideration should be made of the potential for effects in combination with development in other boroughs. 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."

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."

57. 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."

58. Available HRA's for the adopted local plans of neighbouring boroughs[16] have been reviewed. All these assessments found that their local plans will not have an adverse impact on the European Sites. It can be concluded that there will be no 'in-combination' effects.

8. CONCLUSION

59. This screening assessment of the Local Plan – Publication version has not identified any likely significant effects or impacts on the integrity of any European Site. In determining this, the methodology outlined below (and in Section 2 and 3) was followed.

60. 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). 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.

61. The assessment reviewed the reasons for the scoped sites' designation and identified key vulnerabilities. These are outlined in Table 3 below:

Table 3: Key features and vulnerabilities of Scoped European Sites

[16] Lambeth Local Plan – https://www.lambeth.gov.uk/sites/default/files/2021-07/pl_Habitat_Regulations_Assessment_DRLLP_PSV_2020.pdf
Merton Local Plan - https://www.merton.gov.uk/system/files?file=merton20local20plan20habitats20regulations20assessment20stage20320reg1920july21.pdf
Richmond Local Plan - https://www.richmond.gov.uk/media/13322/local_plan_publication_habitats_regulations_assessment_report_2016.pdf. Kingston has no up to date HRA.

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

62. Pathways of impact were identified and assessed. Potential pathways include recreational causes, urbanisation, impacts on surrounding habitat, atmospheric pollution, water resources and water quality. The assessment has found that the Local Plan – Publication version 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?	Reasons
Recreational - No	Wandsworth borough has several open spaces (existing and proposed) available much more locally to the majority of residents than the European Sites. The scale of development resulting from the Local Plan – Publication version is unlikely to significantly increase recreational pressure in Richmond Park.
Urbanisation and on Surrounding Habitats - No	Development resulting from the Local Plan – Publication version and site allocations is unlikely to result in adverse impacts on the integrity of the sites.
Atmospheric Pollution - No	Policy will result in significant improvements to air quality in Wandsworth and across London.
Water Resources and Quality - No	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. Environment Agency's Review of Consents (whereby new abstraction licenses may not be granted if they will harm a European Site). 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.

63. The screening analysis of the Local Plan – Publication version involved examining the policies and site allocations for significant effects on the European sites against established criteria. The policies were all deemed to fall under Category A - no negative effects.

64. Recognising that the Local Plan – Publication version does not exist in isolation, an in-combination assessment was also undertaken. Neighbouring boroughs' HRA's were reviewed including the HRA on the draft London Plan. Taking these into account, there will be no in-combination effects on the integrity of the two sites.

65. In summary, this screening assessment has not identified any significant adverse effects on any Natura 2000 site; particularly Wimbledon Common SAC or Richmond Park SAC. Similarly, the Local Plan – Publication version will not have an adverse impact on the integrity of these. Consequently, the Appropriate Assessment stage is not required on the Local Plan – Publication version.

66. The Council will seek the views of Natural England on the conclusion of this HRA screening assessment as part of the Regulation 19 consultation of the Local Plan.

For more information write to:
Planning Policy and Design,
Environment and Community Services,
Town Hall,
Wandsworth High Street,
London SW18 2PU

Telephone: (020) 8871 6649 / 6650 / 7218 / 7420
email: planningpolicy@wandsworth.gov.uk
or visit our website: www.wandsworth.gov.uk/planning

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