HABITAT SCREENING ASSESSMENT
ON
Draft LOCAL PLAN FOR LAMBETH

February 2013

CONTENTS PAGE

1. INTRODUCTION

1.1 Under European legislation, Lambeth Council is required to undertake a Habitat Regulations Assessment (HRA) on all 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 the new Local Plan. The purpose of this report is to undertake Stage 1 of the HRA process (screening) to establish whether or not the proposals included within the draft Local Plan are likely to have a significant effect on Natura 2000 sites, and thus whether an Appropriate Assessment is required (stage 2 of the HRA).

1.2 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 referred to as Natura 2000 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 the UK is set down in the Conservation (Natural Habitats, & c) Regulations, 1994 in England and Wales, amended in 2007 and recently consolidated into the Conservation of Habitats and Species Regulations 2010 (SI No. 210/490). This means that the effects of the Local Plan on Natura 2000 sites need to be assessed to ensure that the integrity of these sites is maintained.

1.3 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 (see below), 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'.

1.4 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.'

1.5 There are two types of Natura 2000 sites – Special Area of Conservation (SAC) and Special Protection Area (SPA). As a matter of UK government policy, RAMSAR sites are also given equivalent status. SAC sites are important for their habitat features; SPA sites are important for bird populations; and RAMSAR sites are internationally important wetlands.

1.6 This document forms part of the evidence base for the new Local Plan. While it is independent of the Sustainability Appraisal (SA) which also incorporates the Strategic Environmental Assessment; results of this screening exercise will feed into the SA for the Local Plan. It should be noted that a previous HRA screening assessment on the adopted Core Strategy was prepared which concluded that the Core Strategy was not likely to result in significant effects or impact on the integrity of any European Site. The new Local Plan entails a partial review of the Core Strategy which was adopted in January 2011 and incorporation of detailed development management policies and site allocations. A review of policy approach is identified for only a small number of areas of policy, principally affordable housing, student housing, employment land (subject to an employment land review), Vauxhall and Brixton. The spatial strategy, vision and strategic objectives of the Core Strategy are not subject of the review, and accordingly will remain unchanged save for factual updating where appropriate.

2. METHODOLOGY

2.1 The Habitats Regulations process involves the following methodological process (drawn from the 2009 practice guidance by David Tyldesley Associates):

i. Screening: assessing likely significant effects;

ii. Scoping an appropriate assessment;

iii. Appropriate Assessment;

iv. Adding avoidance/mitigation measures;

v. Formal consultation; and

vi. Recording the assessment.

2.2 In accordance with the recognised methodology, Steps 1 and 2 are reported on 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 as outlined above is required.

2.3 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[1]. This is the screening stage of the process and determines whether further steps have to be taken. The Department of Communities and Local Government guidance states the following:

"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."

1 European designated sites (herein referred to as "European sites") are Special Areas of Conservation designated under the Habitats Directive, Special Protection Areas designated under the Conservation of Wild Birds Directive, and Ramsar sites, wetlands of international importance designated under the Ramsar Convention.

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

3. PROXIMITY TO EUROPEAN SITES

3.1 No European sites lie wholly or partly within Lambeth borough; however the sites listed below lie within 15km of the borough's boundaries. Using the Joint Nature Conservation Committee (JNCC) website; taking into account consultation with Natural England in preparing the HRA on the adopted Core Strategy 2011; and in line with the methodology employed in the Appropriate Assessment of the London Plan, the following European sites have been identified that lie within a 15km zone extending from the boundary of the Borough (European sites were included if they occurred either wholly or partially within this geographical area):

- Wimbledon Common SAC lies around 5-6km to the west;
- Richmond Park SAC lies around 7.5km to the west;
- Walthamstow Reservoirs, part of the Lee Valley SPA and Ramsar site, lie around 8-10km to the north east; and
- The extreme southern tip of Epping Forest SAC lies around 12km to the north east, although the main Epping Forest site lies more than 15km away.

3.2 There is no set distance or area of search enshrined in the legislation. It has generally been recommended that a distance of 15km is a suitable catchment to identify Habitats Directive designated sites as the effects of a plan can go beyond its boundary (e.g. water pollution impacting on wetlands beyond the borough boundary). However, HRAs of other Council's plans use a smaller distance: LB Richmond's uses a 5km area of search beyond its borough boundary based on previous research work on the Dorset Heathlands, which looked at changes in visitor pressure with distance from a SPA or SAC site. Others have used 10km (e.g. London Borough of Sutton and Royal Borough of Greenwich).

3.3 This report considers whether the Local Plan, in itself, or in combination with other plans, will adversely affect the integrity of Wimbledon Common, Richmond Park, Walthamstow Reservoirs and Epping Forest.

4. SITE DESCRIPTIONS

4.1 Information for the sites, including the rationale for their declaration as European sites, was taken from the 'Appropriate Assessment of the Draft Replacement London Plan'[2]. This also includes supplementary information to assist in the assessment of the significance of any impacts of policies on their nature conservation interest. This is presented in the table on the following pages. The contents of the table were compiled with reference to the sources listed below, and also informed by previous consultation with Natural England.

Key and information source for Table below (next page)

Site name and designation and code.	Obtained from English Nature 'Natura 2000 Forms' and RAMSAR forms from the JNCC website.
Qualifying features.	Denoting the habitats and species for which the sites have been awarded EU conservation status. It is these qualifying features, which the AA must safeguard. Obtained from 'Natura 2000' and RAMSAR forms, the qualifying features form the basis of English Nature's 'conservation objectives for the European interest on SSSIs'.
Current condition and threats.	Information pertaining to the current status of sites, recognised trends, and potential threats. From Natura 2000, RAMSAR, and Conservation Objectives forms.
Result of July 2006 SSSI condition survey.	From English Nature's 2006 review of SSSI condition.
Key ecosystem factors.	Denotes general ecological parameters of importance to maintaining site integrity. Summarised from the 'attributes' in the Conservation Objectives forms.

[2] ERM October 2009

Table 1: Characteristics of European Sites within 15 km of Lambeth Borough boundary

Site name	Designation and code	Qualifying features		Current condition and threats	Result of July 2006 SSSI condition survey	Key ecosystem factors
		Habitats	Species			
Wimbledon Common	SAC UK0030301	To maintain in favourable condition the: European dry heath, for which the area is considered to support a significant presence. Northern Atlantic wet heath with *Erica tetralix*, for which the area is considered to support a significant presence.	To maintain in favourable condition the habitats for the population of: Stag beetle, for which this is one of only 4 known outstanding localities in the UK.	The site is located in an urban area and therefore experiences intensive recreational pressure which can result in damage to the sensitive heathland areas. Air pollution is also thought to be having an impact on the quality of the heathland habitat.	Area favourable 33% Area unfavourable recovering 64% Areas unfavourable no change 3%	Extent, Natural processes and structural development, Regeneration potential, Composition, Species, Habitats, structures characteristic of the site.
Richmond Park	SAC UK0030246		To maintain in favourable condition the habitats for the population of: Stag beetle, for which this is one of only 4 known outstanding localities in the UK.	The site is surrounded by urban area and therefore experiences high levels of recreational pressure. This does not directly affect the European interest feature. The whole site has been declared an NNR.	Area favourable 6% Area unfavourable recovering 8% Areas unfavourable no change 86%.	Population size of species, Number of old broadleaved trees, Population structure of broadleaved trees, Condition of old broadleaved trees - state of decay, Quantity and size of fallen broadleaved dead wood, Position and degree of exposure of old broad leaved trees and stumps, Condition and position of available dead timber.
Lee Valley (Walthamstow Reservoirs)	SPA UK9012111 RAMSAR UK 11034	To maintain in favourable condition the habitats for the populations of an Annex I species* and populations of migratory bird species**, of European importance with particular reference to: Open water and	Bittern *Botaurus stellaris*, 6 individuals representing at least 6.0% of the wintering population in Great Britain (5 year peak mean, 1992/3-1995/6) Gadwall *Anas strepera*, 515 individuals representing at least 1.7% of the wintering Northwestern Europe	Most of the site is in favourable condition. There are currently no factors having a significant adverse effect on the site's ecological character. Although the site currently experiences high levels of visitor pressure, it is not currently deemed to be	100% of Walthamstow Marshes are 36% favourable and 63% unfavourable but recovering.	Disturbance, Extent and distribution of habitat, Landscape, Landform, Vegetation characteristics, Water area, Water depth, Food availability.

Site name	Designation and code	Qualifying features		Current condition and threats	Result of July 2006 SSSI condition survey	Key ecosystem factors
		Habitats	**Species**			
		surrounding marginal habitats.	population (5 year peak mean 1991/2 -1995/6) Shoveler *Anas clypeata*, 748 individuals representing at least 1.9% of the wintering Northwestern/Central Europe population (5 year peak mean 1991/2 - 1995/6) Under Ramsar criteria 2, the site also supports a nationally scarce plant species and a rare invertebrate.	at levels that threaten the SPA/ Ramsar site3. However, a significant increase in recreational pressure could impact upon wintering wildfowl numbers. The SPA exceeds both the critical threshold for NOx and its critical nitrogen load for the key habitat for which data are available and which the SPA birds are likely to use. Sulphur dioxide does not currently appear to be a problem for this site.		
Epping Forest	SAC UK0012720	To maintain in favourable condition: Atlantic acidophilous beech forest; European dry heaths; and Northern Atlantic wet heaths.	Stag beetle, for which this is one of only four known outstanding localities in the UK.	The reintroduction of pollarding and wood pasture management is helping to reverse the decline of the epiphytic bryophyte population. Existing air pollution is thought to contribute to poor condition of parts of the site. Increasing recreational pressure could have an impact on heathland areas.	Area favourable 30% Area unfavourable recovering 34% % area unfavourable no change 26% % area unfavourable declining 10%	Extent, Natural processes and structural development, Regeneration potential, Composition, Species, Population size of species, Number of old broadleaved trees, Population structure of old broadleaved trees, Condition of old broadleaved trees, Quantity and size of fallen broadleaved dead wood, Position and degree of exposure of old broadleaved trees and stumps, Condition and position of available dead timber.

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[3] JNCC (2000) Information Sheet on Ramsar Wetlands – Lee Valley http://www.jncc.gov.uk/pdf/RIS/UK11034.pdf

5. IMPACT TYPES

5.1 Understanding the various ways in which land use plans can affect European sites is important in terms of screening for the Habitats Regulations. Current guidance suggests that the following European sites be included in the screening list:

- sites within the authority's boundary; and
- sites shown to be linked to development within the authority's boundary through a known 'pathway' (discussed below).

5.2 Briefly defined, pathways are routes by which a change in activity within Lambeth Borough can lead to an effect upon a European site. In terms of this second category of European site listed above, CLG guidance states 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, the screening list is inevitably limited to those Natura 2000 sites for which recommended mitigation or alternatives to Local Plan policy can contribute significantly towards the protection of those sites and their nature conservation objectives. The following pathways are likely to require consideration of effects and each is discussed in detail below:

Recreational causes

5.3 Terrestrial European sites can be adversely affected by recreational causes such as walkers (in turn causing soil compaction and erosion), dog walking (leading to soil enrichment from dog fouling and potential harassment of wildlife and damaged sensitive habitats as dogs are less likely to keep to marked footpaths), mountain biking, motorbike scrambling, and off-road vehicle use are all capable of causing serious erosion as well as disturbance to sensitive species. Water-bourne recreation can also adversely affect sensitive water bodies.

5.4 The latest England Day Visits Survey results are from 2005. This survey indicated that people typically travel:

- 10.8 miles (17.2 km) to visit a countryside site for the day;
- 11.3 miles (18.1 km) to visit a woodland site for the day; and
- 16 miles (25.5 km) to visit a coastal site for the day.

5.5 The survey found that most of these journeys are made by car rather than foot, cycling or public transport. While these are generalised figures; they provide an indication of distances and means people are prepared to travel. Visitor information numbers may prove more useful in determining recreational impacts. In terms of Lee Valley SPA and Ramsar site high visitor levels are experienced for recreational uses, with the wider Lee Valley Regional Park receiving over four million visits annually. Specific visitor information for Epping Forest is not available but the City of London estimate the Forest receives 'millions of visitors annually' (City of London, 2007).

<u>Effects of Lambeth Local Plan</u>

5.6 The Local Plan makes allowance for at least 1195 dwellings per year over the period 2011-2021. It is anticipated that by 2026 the population of Lambeth will have grown to 317,000, representing about a 4% increase on the population in 2011. Based on the England Day Visits Survey data, theoretically it is conceivable that residents of Lambeth may travel to a Natura 2000 site for recreational purposes. However, this is considered unlikely for the following reasons:

- Lambeth Borough residents are unlikely to travel north east through central London (with its congestion and weekday congestion charge scheme) to reach the southern extremities of Walthamstow Reservoirs or Epping Forest.

- Lambeth residents have a number of large open spaces available much more locally, either within the borough or on its immediate edges (e.g. Clapham Common, Wandsworth Common, Dulwich Park, Brockwell Park, Sydenham Hill Woods etc) which attract large numbers of visitors. This part of South London is well served by open space.

5.7 Richmond Park is not thought to be sensitive to recreational pressure. Whilst residents of Lambeth may visit Wimbledon Common, these would be in comparatively small numbers and the increases in borough population planned through the Local Plan is not thought to be significant in terms of increased recreational pressure on Wimbledon Common.

5.8 Nonetheless, Local Plan policies should seek to avoid loss of recreational open space within the Borough, encourage sufficient access to existing open spaces, and make provision for new space within or nearby to proposed areas accommodating the new residential dwellings.

Urbanisation

5.9 While urbanisation impacts are related to recreational impacts; it is discussed separately in this assessment as population in an area can create adverse social effects such as fly tipping and inadvertently fabricate an environment with damaging consequences to species such as owning a domestic cat (predation), or causing light or noise pollution to ornithological or bat species. In some response to this, Natural England, on a number of different planning applications, has identified 400m from an 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 Lambeth Local Plan

5.10 Given the Natural England guidance and the distance between Lambeth Borough and the sites (minimum of five kilometres), any urbanisation impacts as a result of the Lambeth Local Plan policies are unlikely to have an adverse effect on the conservation features for which the sites are designated. It is also considered that urbanisation in Lambeth will not result in an adverse impact on the integrity of any of the sites.

Impacts on surrounding habitat

5.11 Related to urbanisation, impacts on surrounding habitats mostly concerns the development of land close to sites leading to a significant adverse effect on the site's integrity, particularly those designated for their ornithological or bat interest. Similarly, impacts affecting species or habitat on surrounding land upon which designated sites rely can adversely affect the species or habitat within the European site.

Effects of Lambeth Local Plan

5.12 Given the distance between Lambeth Borough and the four sites (of at least five kilometres away), any impacts as a result of the Lambeth Local Plan policies are unlikely to have an adverse effect on the bird species of the SPA, nor are any species within Lambeth Borough, likely to have an adverse effect upon the species within the designated site, nor is this considered to have an adverse impact on the integrity of the sites.

5.13 Lambeth is known to support populations of stag beetle (for which Wimbledon Common and Richmond Park are designated), with back gardens being a favoured habitat. However, it is considered that the populations of stag beetles in areas more than 5km 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 Lambeth (parks, woodlands and larger gardens) are unlikely to be affected by proposed development in the Local Plan. The Local Plan does not promote housing development on back gardens, rather it promotes the recreational role of private and communal gardens.

Atmospheric pollution

5.14 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. In a typical housing development, the largest contribution of NOx will be made by the associated road traffic. Therefore it is reasonable to expect that emissions of NOx will increase if policies within the Local Plan result in greater vehicle use.

5.15 Sulpher dioxide (SO2) and Ammonia emissions (NH3) are the other main atmospheric pollutants. SO2 is mainly concerned with the output of coal stations and industrial processes that require the combustion of coal and oil. NH3 emissions are influenced by agriculture. As such, it is unlikely that there will be any fundamental increase in SO2 and NH3 emissions associated with the Local Plan.

5.16 According to the World Health Organisation, the critical NOx concentration (critical threshold) for the protection of vegetation is 30 μgm^{-3}; the threshold for sulphur dioxide is 20 μgm^{-3}. In addition, ecological studies have determined 'critical loads' of atmospheric nitrogen deposition (that is, NOx combined with ammonia NH3) for key habitats within the European sites considered within this assessment (Table 2). It can be seen that Epping Forest SAC is the key site of concern for London with regard to air quality, as it currently exceeds its critical load for nitrogen deposition by a large margin and also has a NOx concentration above the critical level. Wimbledon Common also has NOx concentration that exceeds the critical level. The Lee Valley SPA also has NOx concentration that exceeds the critical level but in this case the interest features of the site (wintering gadwall, shoveler and bittern) rely more on the open water and marginal vegetation and the botanical composition of the grassland is likely to have little effect on their use of the site.

5.17 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 Lambeth are generally from the south west, which would take Lambeth pollution away from Wimbledon Common – but in the general direction of Epping Forest, although the main body of this site lies over 15km away. Epping Forest SAC lies within 200m of the M25 and is already adversely affected by poor air quality.

5.18 According to the APIS (Air Pollution Information System) website, 20% of nitrogen currently deposited within Epping Forest derives from road transport exhaust emissions. It should be noted that Natural England commented when recently consulted on the HRA Scoping Report for the Hertfordshire Local Transport Plan that in their opinion 20% is likely to be a considerable underestimate. Other

evidence, has suggested that the ratio between background pollution and that which is locally traffic-derived varies considerably across the Forest, but that the contribution from traffic (including that from NH3) may be as much as 50% of the total. In addition, the background pollution, which is mostly derived from London, will also include a proportion which is derived from traffic. This proportion is unknown, but data in the GLA's Air Quality Strategy suggests that it may be as high as 50% of the background pollution. Therefore, the overall contribution from road traffic may potentially be in the order of 60-75% of the total[4].

Table 2: Critical nitrogen loads, actual rates of nitrogen deposition and NOx concentrations for the three European sites considered within this assessment (APIS[5] data 2011)

Site	Key habitats	Minimum critical loads[6] (Kg N/Ha/Yr)	Actual N deposition[7]	Actual NOx concentration[8] (μgm^{-3})
Lee Valley SPA and Ramsar	Open water, Improved grassland, Neutral grassland	NA NA 20	17.2	31.2
Epping Forest SAC	Beech woodland Lowland heathland	10 20	32.2	33.7
Wimbledon Common SAC	Lowland dry heathland Wet heath	20 25	15.0	41.0

5.19 In terms of diffuse air pollution, Natural England advised Runnymede Borough Council on air pollution in July 2006. An excerpt of the letter follows:

'The air pollution associated with developments that could arise from the LDF CS is primarily a result of predicted increases in traffic and construction activities. Pollutants can act locally or be transported far from the source in long range transport to act nationally or even internationally. The LDF CS can only be concerned with locally emitted and short range locally acting pollutants'1. In terms of pollution from vehicular emissions the concentrations decline exponentially from the road edge. Though it varies with a range of factors and from pollutant to pollutant, the concentrations of pollutant from roads can be said to have localised impacts up to 200m from the road side. Therefore, for the LDF CS effects of vehicular atmospheric emissions should be considered if the roads on which the vehicles travel are closer than 200m from the Natura 2000 site.' (Natural England 2006).

5.20 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, 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 Lambeth Local Plan

5.21 Given the above information on SO2 and NH3, it is unlikely that there will be any fundamental increase in SO2 and NH3 emissions associated with the Lambeth Local Plan.

[4] Letter from Natural England following consultation as part of the scoping exercise to inform the HRA of the Hertfordshire Local Transport Plan (2010)
[5] UK Air Pollution Information System. http://www.apis.ac.uk
[6] APIS provides a critical load range – on a precautionary basis, this assessment uses the lowest figure in that range
[7] To a resolution of 5 km
[8] As NO_2

5.22 As the Local Plan seeks to accommodate 1195 new dwelling units each year; it is conceivable that there may be an associated increase in vehicle use. However, the Local Plan makes clear that such development will be targeted in key locations that are better served by public transport.

5.23 Furthermore, 50.9% of Lambeth's households have no access to a car – one of the highest proportions in the country – and a high proportion of residents use public transport (Lambeth has the highest proportion of population who travel to work by public transport – 58.6% compared with 14.1% nationally[9]). The Local Plan seeks to promote increased use of public transport, cycling and walking. Therefore it is unlikely that the Local Plan will result in significant increases to NOx levels to threaten European sites which are sensitive to air pollution, such as Wimbledon Common (not located within prevailing wind direction) or Epping Forest (most of which is over 15km distant).

5.24 There are no Natura 2000 sites within 200m of any roads in the Lambeth Borough (the distance at which effects of emissions should be considered). Accordingly, in view of the above advice provided by Natural England, NOx resulting from vehicle emissions associated with Local Plan development need not be considered further.

Water Resources

5.25 London and the South East of England have been classified as areas under serious water stress. Indeed, there is less water available per person in this region than there is in many Mediterranean countries. Attributable to climate change, London and South East England is expected to experience hotter, drier summers and warmer wetter winters, and more extreme weather events, including drought. Therefore, it may be impractical in the longer term to preserve wetland habitats to their current quality; however in the short and medium term it should be a priority to reduce water stress of European sites.

Effects of Lambeth Local Plan

5.26 While the Local Plan promotes 'growing' and 'enhancing' features for the Lambeth Borough, it is considered unlikely that any increase in development will adversely affect or impact on the integrity of the four sites for reasons pertaining to water resources. This is because of the distance between the Borough and the sites; and because 80 percent 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. Increases in water demand are unlikely to adversely affect sites or impact on their integrity due to both the Environment Agency's Review of Consents (whereby new abstraction licences may not be granted if they will harm a European Site) and that Thames Water has recently built three pumping stations to abstract water from unused underground water springs in east London. Similarly, the Local Plan requires new development to meet the Code for Sustainable Homes standard, and this incorporates water efficiency measures.

Water quality

5.27 Increased amounts of housing or business 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.

[9] LB Lambeth Core SA Scoping Report, CAG December 2008.

5.28 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.

5.29 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.

5.30 Increased discharge of treated sewage effluent, can result both in greater scour (as a result of greater flow volumes) and in high levels of macro algal growth, which can smother mudflats of value to SPA birds.

Effects of Lambeth Local Plan

5.31 Any increases in wastewater resulting from policies promoting population, housing and employment growth in Lambeth are not likely to affect the four Natura 2000 sites as wastewater is treated at the Crossness Treatment Plant and discharged into the Thames. The treatment plant serves the South East of London and as such is located south of the River Thames avoiding any potential path with the European sites.

6. LONDON PLAN HRA

6.1 The HRA for the London Plan 2011 identifies sensitivities in relation to Natura 2000 Sites from secondary effects:

'The main links between proposals in the London Plan and known sensitivities of European designated sites are focused on secondary effects. Secondary effects include pollution effects on habitats and species arising from air emissions for example from vehicles, waste facilities and disturbance to habitats and species which could result from increased accessibility to specific areas as the key growth areas develop'.

6.2 In relation to visitor pressure, it identifies Wimbledon Common as an area which could be influenced by the London Plan in terms of increasing the number of people accessing the site. It sees the main potential impact as being from Opportunity Areas and Intensification Areas identified in the Plan: in particular for Wimbledon Common this means South Wimbledon/Colliers Wood Intensification Area 42 and associated housing. It provides recommendations for avoiding impacts from Opportunity Areas and Intensification Areas plus it sets out an overarching policy statement regarding the protection of European sites (see Section 4.3). Suggested lower tier assessment scope and consideration for in-combination effects are detailed in Sections 4.4 and 4.5 of the London Plan HRA.

6.3 In relation to air pollution, it states:

'Air pollution is the only other sensitivity considered to have the potential to arise from the London Plan. Air pollution threats include nitrogen deposition and acidification which can arise from thermal treatment facilities put forward by waste strategies or an increase in traffic levels in close proximity to the sites, or in-combination with air emissions from other sources (sourced from relevant Conservation Objectives):

- *Epping Forest SAC – existing air pollution, particularly arising from traffic is thought to contribute to poor condition of parts of the site; and*
- *Wimbledon Common – air pollution is thought to be having an impact on heathland habitat.*

The policies and proposals in the London Plan seek a reduction in air pollution (see Policies 5.2 and 7.14 of the London Plan) which could have a beneficial effect on sensitive European sites. The specific need for avoidance of likely adverse effects on the integrity of European sites is addressed through the overarching policy (see Section 4.3). In addition, suggested lower tier assessment scope and consideration for in-combination effects are detailed in Sections 4.4 and 4.5.

There is also a commitment made by GLA to the production of an Air Quality Strategy, which will itself include Habitats Regulations Assessment and will need to demonstrate no likely significant effects on European sites. The proposals within the London Plan will not prevent flexibility within the Air Quality Strategy to implement changes if likely significant effects are predicted.

The above identified key threats were considered when reviewing the policies within the London Plan and providing recommendations for the overarching policy statement (see Section 4.3) and the need for and scope of lower tier assessment and in-combination assessment'.

7. SCREENING ANALYSIS

7.1 The Local Plan has been assessed against the adapted criteria in Table 7.1 below (from Tyldesley and Associates 2009). This sets out four categories of potential effects as follows:

- **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.

7.2 Categories A, C and D are further subdivided and more detail is provided in Table 3 below.

Table 3: Criteria to assist in determining adverse effects on European Sites

Category	Ref	Explanation
Category 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.
Category B: No significant effect	B	Effects are trivial or 'de minimis', even if combined with other effects
Category C: Likely 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, which 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
Category D: Likely 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
	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

Table 4: Assessment of Local Plan policies

Policy	Likely to have an impact	Reason	Essential recommendations to avoid adverse effect
D1 Delivery and monitoring	No	A5	None
D2 Presumption in favour of sustainable development	No	A5	None
D3 Infrastructure	No	A4 / A5	None
D4 Planning Obligations	No	A1	None
D5 Enforcement	No	A1	None
H1 Maximising housing delivery	No	A4	None
H2 Delivering affordable housing	No	A1	None
H3 Safeguarding existing housing	No	A1	None
H4 Housing mix in new developments	No	A1	None
H5 Housing standards	No	A1 / A5	None
H6 House conversions	No	A4	None
H7Student housing	No	A4	None
H8 Housing to meet specific community needs	No	A4	None
H9 Hostels and houses in multiple occupation	No	A4	None
H10 Gypsy and traveller needs	No	A4	None
ED1 KIBAs	No	A4	None
ED2 Business uses outside of KIBAs	No	A4	None
ED3 Large offices	No	A4	None
ED4 Work-live development	No	A4	None
ED5 Railway arches	No	A4	None
ED6 Town centres	No	A4	None
ED7 Changes of use with town centres	No	A4	None

ED8 Night-time economy and food and drink uses	No	A4	None
ED9 Hot food takeaways near schools	No	A4	None
ED10 A2 uses	No	A4	None
ED11 Loss of retail uses outside town centres	No	A4	None
ED12 Visitor attractions, leisure, arts and culture uses	No	A4	None
ED13 Hotels and other visitor accommodation	No	A4	None
ED14 Markets	No	A4	None
ED15 Employment and training	No	A1	None
S1 Safeguarding existing community facilities	No	A4	None
S2 New or improved community facilities	No	A4	None
S3 Schools	No	A4	None
T1 Sustainable travel	No	A3	None
T2 Walking	No	A3	None
T3 Cycling	No	A3	None
T4 Public transport infrastructure	No	A4	None
T5 River transport	No	A3 / A4	None
T6 Assessing impacts of devt on transport capacity	No	A3	None
T7 Parking	No	A3	None
T8 Servicing	No	A3	None
T9 Mini-cabs, taxis and private hire vehicles	No	A3	None
T10 Telecommunications	No	A3	None
EN1 Open space	No	A2	None
EN2 Local food growing and production	No	A2 / A3	None
EN3 Low carbon and energy	No	A1/ A3	None
EN4 Sustainable design and construction	No	A2 / A3	None
EN5 Flood risk	No	A3	None
EN6 Sustainable drainage systems and water mgmt	No	A2 / A3	None
EN7 Sustainable waste management	No	A2 / A3	None
Q1 Inclusive environments	No	A1	None
Q2 Amenity	No	A3	None
Q3 Community safety	No	A1	None
Q4 Public art	No	A1	None
Q5 Environmental enhancement strategies	No	A1 / A3	None
Q6 Local distinctiveness	No	A1	None
Q7 Urban design public realm	No	A1	None
Q8 Urban design new developments	No	A1	None
Q9 Design quality construction detailing	No	A1	None
Q10 Landscaping	No	A2 / A3	None
Q11 Trees	No	A2 / A3	None
Q12 Building alterations and extensions	No	A1 / A4	None
Q13 Refuse / recycling storage	No	A1	None
Q14 Cycle storage	No	A1	None
Q15 Development in gardens	No	A2 / A3	None
Q16 Boundary treatments	No	A1 / A3	None
Q17 Shop fronts and signage	No	A1 / A3	None
Q18 Advertisement panels and hoardings	No	A1 / A3	None
Q19 Historic Environment Strategy	No	A1 / A3	None
Q20 Westminster World Heritage Site	No	A1 / A3	None
Q21 Statutory listed buildings	No	A1 / A3	None
Q22 Registered parks and gardens	No	A1 / A3	None
Q23 Conservation areas	No	A1 / A3	None
Q24 Undesignated heritage assets	No	A1 / A3	None
Q25 River Thames	No	A1 / A3	None
Q26 Views	No	A1 / A3	None
Q27 Tall buildings	No	A1 / A3	None
PN1 Waterloo	No	A4	None
PN2 Vauxhall	No	A4	None
PN3 Brixton	No	A4	None
PN4 Streatham	No	A4	None
PN5 Clapham	No	A4	None
PN6 Stockwell	No	A4	None
PN7 Oval	No	A4	None
PN8 West Norwood / Tulse Hill	No	A4	None
PN9 Herne Hill	No	A4	None

PN 10 Loughborough Junction	No	A4	None
Site 1	No	A4	None
Site 2	No	A4	None
Site 3	No	A4	None
Site 4	No	A4	None
Site 5	No	A4	None
Site 6	No	A4	None
Site 7	No	A4	None
Site 8	No	A4	None
Site 9	No	A4	None
Site 10	No	A4	None
Site 11	No	A4	None
Site 12	No	A4	None
Site 13	No	A4	None
Site 14	No	A4	None
Site 15	No	A4	None
Site 16	No	A4	None
Site 17	No	A4	None

In combination effects

7.3 The assessment has not identified any significant effects arising from the Plan alone. However, Lambeth does not sit in isolation and consideration should be made of the potential for effects in combination with development in other Boroughs. The HRA Screening Report prepared for the development of the London Plan has been reviewed. This found that some policies/proposals could give rise to likely significant effects on European Sites and thus it could not be concluded at that stage that policies would have no likely significant effects. The HRA found that the main potential effects are likely to arise from increased visitor pressure brought about through development and infrastructure in key areas and air quality effects. These have largely been addressed by the inclusion of an overarching policy statement to ensure the avoidance of adverse impacts to the integrity of all the European sites. In particular, the HRA identified elements of the London Plan requiring lower tier assessment and key effects requiring consideration. Identified elements of the London Plan applicable to Lambeth requiring assessment of effects include transport and waste. Likely effects identified were increased visitor/adjacent recreational pressure resulting in disturbance to bird populations and supporting habitat; and air pollution resulting in adverse effects on habitats and species. The Lambeth Local Plan seeks to mitigate against such effects by a variety of ways including for example, providing sufficient recreational space within the Borough, and promoting active and sustainable travel. Wastewater for the South East of London is treated at the Crossness Treatment Plant.

7.4 It should be noted that the HRA on the London Plan maintains that no direct adverse impacts are expected from the London Plan.

7.5 Available HRA's for the Core Strategies of neighbouring boroughs have been reviewed. Some of these boroughs are located closer to European Sites than Lambeth Borough. In general all of these assessments found that their Core Strategies and/or Local Plans will not have an adverse impact on the European Sites, and they have surmised that there will be no 'in-combination' effects. Therefore, it is considered that the Appropriate Assessment stage is not required.

8. Conclusion

8.1 This screening assessment of the Lambeth Local Plan has not identified any likely significant effects or impacts on the integrity of any European Site. In determining this, the methodology outlined below was followed.

8.2 The identification of European Sites within 15km was 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 Lambeth Borough boundary (either wholly or in part) are Wimbledon Common (SAC), Richmond Park (SAC), Walthamstow Reservoirs (SPA and Ramsar) and Epping Forest (SAC).

8.3 The assessment reviewed the reasons for the site designations and identified key vulnerabilities. In brief these are outlined in Table 5 below:

Table 5: Key features and vulnerabilities of European Sites within 15km of Lambeth

Site	Features of Interest	Key Vulnerabilities
Wimbledon Common	• European dry heath • North Atlantic wet heaths with *Erica tetralix* • Stag beetle	• Recreational pressures • Air pollution • 'unfavourable recovering' and 'unfavourable no change' areas
Richmond Park	• Stag beetle	• 'unfavourable recovering; and 'unfavourable no change' areas
Walthamstow Reservoirs	• Bittern *Botaurus stellaris* • Gadwall *Anas strepera* • Shoveler *Anas clypeata*	• Eutrophic water quality, but this is addressed via AMP3 funding under the Urban Waste Water Treatment Directive • Recreational pressure, but this is well regulated through zoning of water bodies within lee Valley Regional Park • Walthamstow Reservoirs SSSI 'unfavourable recovering' condition status
Epping Forest	• Atlantic acidophilous beech forest • North Atlantic wet heaths with *Erica tetralix* • European dry heaths • Stag beetle	• Air pollution • Declining epiphytic bryophyte populations due to the death of pollards, shading and pollution form acid rain, however the reintroduction of pollarding and wood pasture management is helping to reverse the decline • 'unfavourable recovering', 'unfavourable no change' and 'unfavourable declining' areas

8.4 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 Lambeth Local Plan is unlikely to have adverse effects on the European Sites and will not result in an adverse impact on the integrity on the two sites. A summary of the potential pathways are provided in Table 6 below.

Table 6: Potential Pathways to European Sites

Potential pathway to cause adverse effect – Y/ N?	Reasons
Recreational - No	• Lambeth Borough and South London have a number of open spaces available much more locally than the European Sites • Sites have management strategies, for example Epping Forest which includes licensing for some recreational activities • Richmond Park is not thought to be sensitive to recreational pressure
Urbanisation and Impacts on Surrounding Habitats – No	• Generally, Natural England suggests 400m from an 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 • Given the above general guidance and the distance between Lambeth Borough and the four sites (at least 5 km), development resulting for the Local Plan is unlikely to result in adverse impacts on the integrity of the site
Atmospheric Pollution – No	• Natural England advised Runneymede Borough Council that vehicular emissions decline exponentially from the road edge, and the concentration of pollutant from roads can be said to have localised impacts up to 200m from the road side. • There are no European Sites within 200m of any roads in the Lambeth Borough.
Water resources and quality - No	• Wastewater is treated at the Crossness Treatment Plant and discharged into the Thames • 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 • Potential problem from over-extraction of surface water for public supply; however this is addressed through Environment Agency review of consents.

8.5 The Screening Analysis of the Local Plan was undertaken against criteria devised by Tyldesley and Associates (2009). This involved screening the policies and site allocations for significant effects on the European Sites against the criteria. The policies were all deemed to fall under Category A – no negative effects.

8.6 Recognising that the Lambeth Local Plan does not exist in isolation; an in-combination assessment was also undertaken. Neighbouring borough HRA's were reviewed including the HRA on the London Plan 2011. Taking these into account it is considered there will be no in-combination effects on the integrity of the four sites.

8.7 In summary, this screening assessment on the Local Plan has not identified any likely significant adverse effects on any European Site. Similarly, it is considered that the Local Plan will not have an adverse impact on the integrity of the four sites. Therefore, the Appropriate Assessment stage is not required on the Local Plan for Lambeth Borough.