

INITIAL
HABITAT SCREENING ASSESSMENT
ON
Draft Revised Lambeth Local Plan October 2018

October 2018



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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 undertaking a partial review of the Lambeth Local Plan 2015. The purpose of this report is to undertake an initial Stage 1 of the HRA process (screening) to establish whether or not the proposals included within the Draft Revised Lambeth Local Plan October 2018 (DRLLP) 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 DRLLP 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 DRLLP. 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 DRLLP. It should be noted that a previous HRA screening assessment on the adopted Local Plan 2015 was prepared which concluded that the Local Plan was not likely to result in significant effects or impact on the integrity of any European Site. The DRLLP entails a partial review of the Lambeth Local Plan 2015. This involves some proposed new areas of policy, some proposed revisions to policy and some proposed changes to policy designations (such as town centre boundaries, Key Industrial and Business Areas, Sites of Nature Conservation Importance). Existing site allocation policies remain unchanged, although some are proposed for deletion. The spatial strategy, vision and strategic objectives of the Lambeth Local Plan remain but have undergone 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 site¹. 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 DRLLP under the Habitats Regulations was undertaken during the preparation of the DRLLP, 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 Lambeth Local Plan 2015; and in line with the methodology employed in the draft London Plan Habitats Regulations Assessment Screening (Nov 2017), 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, some HRAs of other Council's plans use a smaller distance: LB Richmond have used 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 previously used 10km (e.g. London Borough of Sutton and Royal Borough of Greenwich).

3.3 This report considers whether the DRLLP, 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 draft London Plan Habitats Regulations Assessment Screening (Nov 2017). 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 page.

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

Site name	Reasons for Designation	Current Pressures	Conservation Objectives
Richmond Park SAC	The site is designated as an SAC for the following Annex II species: <ul style="list-style-type: none"> Stag beetle <i>Lucanus cervus</i> 	None specifically identified in the Natural England Site Improvement Plan, although loss of habitat (dead wood) would affect the stag beetle population.	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 (listed below), by maintaining or restoring; <ul style="list-style-type: none"> The extent and distribution of the habitats of qualifying species The structure and function of the habitats of qualifying species The supporting processes on which the habitats of qualifying species rely The populations of qualifying species, and; The distribution of qualifying species within the site.
Wimbledon Common SAC	The site is designated as an SAC for the following Annex I habitats: <ul style="list-style-type: none"> Northern Atlantic wet heaths with <i>Erica tetralix</i> European dry heaths The site is designated as an SAC for the following Annex II species: <ul style="list-style-type: none"> Stag beetle <i>Lucanus cervus</i> 	<ul style="list-style-type: none"> Inappropriate behaviour by some visitors (e.g. collection and removal of dead wood) Habitat fragmentation Invasive species (specifically oak processionary moth <i>Thaumetopoea processionea</i>) Atmospheric pollution (nitrogen deposition) 	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 (listed below), by maintaining or restoring; <ul style="list-style-type: none"> The extent and distribution of qualifying natural habitats and habitats of qualifying species The structure and function (including typical species) of qualifying natural habitats The structure and function of the habitats of qualifying species The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely The populations of qualifying species, and; The distribution of qualifying species within the site.
Epping Forest SAC	Epping Forest qualifies as a SAC for both habitats and species. The site contains Annex I habitats of: <ul style="list-style-type: none"> Beech forests on acid soils with <i>Ilex</i> and sometime <i>Taxus</i> in the shrublayer. Wet heathland with cross-leaved heath; and Dry heath The site contains Annex II species: <ul style="list-style-type: none"> Stag beetle <i>Lucanus cervus</i> 	<ul style="list-style-type: none"> Air pollution Public disturbance Inappropriate water levels Water pollution 	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 (listed below), by maintaining or restoring; <ul style="list-style-type: none"> The extent and distribution of qualifying natural habitats and habitats of qualifying species The structure and function (including typical species) of qualifying natural habitats The structure and function of the habitats of qualifying species The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely

			<ul style="list-style-type: none"> • The populations of qualifying species, and; • The distribution of qualifying species within the site
<p>Lea Valley SPA and Ramsar</p>	<p>Lee Valley qualifies as an SPA for its Annex I species: Wintering:</p> <ul style="list-style-type: none"> • Bittern <i>Botaurus stellaris</i> <p>Migratory:</p> <ul style="list-style-type: none"> • Gadwall <i>Anas strepera</i> • Shoveler <i>Anas clypeata</i> <p>Lee Valley qualifies as a Ramsar site under the following criterion:</p> <ul style="list-style-type: none"> • Criterion 2: The site supports the nationally scarce plant species whorled water-milfoil <i>Myriophyllum verticillatum</i> and the rare or vulnerable invertebrate <i>Micronecta minutissima</i> (a water-boatman); and • Criterion 6: species/populations occurring at levels of international importance. <p>Qualifying Species/populations (as identified at designation):</p> <p>Species with peak counts in spring/autumn: Northern shoveler <i>Anas clypeata</i></p> <p>Species with peak counts in spring/autumn: Gadwall <i>Anas strepera</i></p>	<ul style="list-style-type: none"> • Water pollution • Hydrological changes • Recreational disturbance including angling • Atmospheric pollution 	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring:</p> <ul style="list-style-type: none"> • The extent and distribution of the habitats of the qualifying features • The structure and function of the habitats of the qualifying features • The supporting processes on which the habitats of the qualifying features rely • The population of each of the qualifying features, and; • The distribution of the qualifying features within the site.

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 (potentially 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-borne recreation can also adversely affect sensitive water bodies.

Effects of DRLLP

5.4 The DRLLP makes allowance for at least 1589 net additional dwellings per year over the period 2020-2035. The GLA project that the population will grow to over 359,000 by 2035. The Natura 2000 sites are located between 5km and 15 km away from Lambeth. It is considered unlikely residents of Lambeth will travel in large numbers or frequently to Natura 2000 sites for recreational purposes for the following reasons:

- Lambeth borough residents are unlikely to travel in large numbers of frequently 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. The south London sub-region as a whole is relatively well served by open space.
- Based on 2014 data it appears that 89% of survey respondents originated from within 5km of the Epping Forest SAC and 76% originated from within 4km (Draft London Plan HRA 2017).

- 5.5 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 DRLLP is not thought to be significant in terms of increased recreational pressure on Wimbledon Common.
- 5.6 Nonetheless, DRLLP 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 new residential dwellings.

Urbanisation

- 5.7 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 DRLLP

- 5.8 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 DRLLP 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

- 5.9 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 DRLLP

- 5.10 Given the distance between Lambeth borough and the four sites (of at least five kilometres away), any impacts as a result of the DRLLP 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.
- 5.11 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 DRLLP. The DRLLP seeks to protect the recreational role and biodiversity value of private and communal parks and gardens.

Atmospheric pollution

- 5.12 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 (NO_x) can have a directly toxic effect upon vegetation. NO_x emissions are mainly related to vehicle exhaust. In a typical housing development, the largest contribution of NO_x will be made by the associated road traffic. Therefore it is reasonable to expect that emissions of NO_x will increase if policies within the DRLLP result in greater vehicle use.

- 5.13 Sulphur 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 DRLLP.
- 5.14 According to the World Health Organisation, the critical NO_x 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, NO_x combined with ammonia NH₃) for key habitats within the European sites considered within this assessment. 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 NO_x concentration above the critical level. Wimbledon Common also has NO_x concentration that exceeds the critical level. The Lee Valley SPA also has NO_x 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.
- 5.15 The most acute impacts of NO_x 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 NO_x 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.
- 5.16 In terms of diffuse air pollution, Natural England has previously advised that effects of vehicular atmospheric emissions should be considered if the roads on which the vehicles travel are closer than 200m from a Nature 2000 site. The implication of this is that any long-range contribution made to 'background' concentrations of NO_x or other atmospheric pollutants by the development set out in the DRLLP is outside the remit of the HRA for the DRLLP. Therefore, the issue of 'long-range' pollution need not be considered within this HRA.
- Effects of DRLLP
- 5.17 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 DRLLP.
- 5.18 As the DRLLP seeks to accommodate 1589 net additional dwelling units each year; it is conceivable that there may be an associated increase in vehicle use. However, the DRLLP makes clear it seeks to reduce private vehicle use and that growth will be targeted in key locations that are better served by public transport.
- 5.19 Furthermore, about 50% 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. The DRLLP seeks to promote increased use of public transport, cycling and walking. Therefore it is unlikely that the DRLLP will result in significant increases to NO_x 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).

- 5.20 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, NO_x resulting from vehicle emissions associated with DRLLP development need not be considered further.

Water Resources

- 5.21 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 DRLLP

- 5.22 While the DRLLP 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 uses pumping stations to abstract water from unused underground water springs in east London. Similarly, the DRLLP requires new development to meet the high standards of sustainable design and construction and this incorporates water efficiency measures.

Water quality

- 5.23 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.
- 5.24 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.
- 5.25 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.

- 5.26 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 DRLLP

- 5.27 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. The Thames Tideway Tunnel that is under-construction is expected to be completed in 2023.

6. Draft LONDON PLAN HRA

- 6.1 The HRA (2017) for the draft London Plan 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.
- 6.2 In relation to visitor pressure, it identifies Wimbledon Common as an area which could be influenced by the draft London Plan in terms of increasing the number of people accessing the site. A single 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, Epping Forest SAC, Lea Valley SOA/Ramsar. The draft London Plan sets a target for achieving 36,800 new dwellings in the London Boroughs of Wandsworth and Merton between 2019 and 2029 and 36,400 to be delivered in London Boroughs of Redbridge and Waltham Forest. 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. However, for Epping Forest SAC, provided that adequate mitigation is delivered and in terms of enhanced access and visitor management within the SAC and/or significant enhanced access to other areas of natural greenspace that would be used as an alternative, there is no a priori reason to conclude that these housing targets are inherently unachievable without an adverse effect on the SAC. It is considered that the scale of growth proposed for Merton, Kingston and Wandsworth in the draft 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. For Lea Valley SPA/Ramsar recreational disturbance is not considered an issue for growth in London since Walthamstow Reservoirs are currently considered an underused recreational resource and is thus has been opened up to the public as part of the carefully planned Walthamstow Wetlands project.
- 6.3 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 fourteen 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 within the Greater London Authority boundary. Whilst it is noted that the aim is in general to improve air quality from a public health perspective, any improvement in air quality will have a positive knock-on-effect to European designated sites that are sensitive to atmospheric pollution. Overall, the Mayor's air quality policies in the draft London

Plan, The Mayor’s Transport Strategy and the London Environment Strategy is expected to result in a considerable net improvement in air quality in London (including the Epping Forest area) over the plan period and beyond even allowing for growth in population and jobs.

7. SCREENING ANALYSIS

7.1 The DRLLP has been assessed (see Table 3) against the adapted criteria in Table 2 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 2 below.

Table 2: 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	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

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significant effect alone	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
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 3: Assessment of DRLLP 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 Residential conversions	No	A4	None
H7 Student 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
H11 Estate regeneration	No	A4	None

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H12 Build to rent	No	A4	None
H13 Large-scale purpose-built shared living	No	A4	None
ED1 Offices (B1a)	No	A4	None
ED2 Affordable workspace	No	A4	None
ED3 KIBAs	No	A4	None
ED4 Non-designated industrial sites	No	A4	None
ED5 Work-live development	No	A4	None
ED6 Railway arches	No	A4	None
ED7 Town centres	No	A4	None
ED8 Night-time economy and food and drink uses	No	A4	None
ED9 Public houses	No	A4	None
ED10 A2 uses, betting shops and payday loan shops	No	A4	None
ED11 Local centres and dispersed local shops	No	A4	None
ED12 Markets	No	A4	None
ED13 Visitor attractions, leisure, arts and cultural uses	No	A4	None
ED14 Hotels and other visitor accommodation	No	A4	None
ED15 Employment and training	No	A1	None
S1 Safeguarding existing social infrastructure	No	A4	None
S2 New or improved social infrastructure	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
T7 Parking	No	A3	None
T8 Servicing	No	A3	None
T9 Mini-cabs, taxis, private hire vehicles and ride hail services	No	A3	None
T10 Digital connectivity infrastructure	No	A3	None
EN1 Open space, green infrastructure and biodiversity	No	A2	None
EN2 Local food growing and production	No	A2 / A3	None
EN3 Decentralised 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 Safety, crime prevention and counter terrorism	No	A1	None
Q4 Public art	No	A1	None
Q5 Local distinctiveness	No	A1	None
Q6 Urban design public realm	No	A1	None
Q7 Urban design new developments	No	A1	None
Q8 Design quality construction detailing	No	A1	None
Q9 Landscaping	No	A2 / A3	None
Q10 Trees	No	A2 / A3	None
Q11 Building alterations and extensions	No	A1 / A4	None
Q12 Refuse / recycling storage	No	A1	None
Q13 Cycle storage	No	A1	None
Q14 Development in gardens and on sites previously developed rear land with no street frontage	No	A2 / A3	None
Q15 Boundary treatments	No	A1 / A3	None
Q16 Shop fronts	No	A1 / A3	None
Q17 Advertisements and signage	No	A1 / A3	None
Q18 Historic Environment Strategy	No	A1 / A3	None
Q19 Westminster World Heritage Site	No	A1 / A3	None
Q20 Statutory listed buildings	No	A1 / A3	None
Q21 Registered parks and gardens	No	A1 / A3	None
Q22 Conservation areas	No	A1 / A3	None
Q23 Non-designated heritage assets: local heritage list	No	A1 / A3	None
Q24 River Thames	No	A1 / A3	None
Q25 Views	No	A1 / A3	None
Q26 Tall and large buildings	No	A1 / A3	None

Q27 Basement development	No	A1 / A3	None
PN1 Waterloo and South Back	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
PN11 Upper Norwood	No	A4	None

In combination effects

7.3 The assessment (Table 3) has not identified any significant adverse effects arising from the DRLLP 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 2017 prepared for the development of the draft London Plan has been reviewed. It identified that *‘several amendments to policy or matters of direction to boroughs (particularly those around Epping Forest SAC) are required. However, once those matters are addressed it is considered that this report could be updated to conclude that there are sufficient protective mechanisms in place to ensure that the growth objectives of the London Plan can be delivered without likely significant effects on European sites, either alone or in combination with other plans and projects’* (GLA HRA Screening Nov 2017).

7.4 Available HRA's for the Local Plans 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 Local Plans will not have an adverse impact on the European Sites, and they have concluded 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 DRLLP has not identified any likely significant effects or impacts on the integrity of any European Site. In determining this, the methodology outlined below (and section 2 of this report) was followed.
- 8.2 The identification of European Sites within 15km is a standard that has previously been agreed with Natural England as the distance at which pathways of impact may be likely to occur. The sites which fall within 15km of the 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 4 below:

Table 4: Key features and vulnerabilities of European Sites within 15km of Lambeth

Site	Features of Interest	Key Vulnerabilities
Wimbledon Common	<ul style="list-style-type: none"> • European dry heath • North Atlantic wet heaths with <i>Erica tetralix</i> • Stag beetle 	<ul style="list-style-type: none"> • Recreational pressures • Air pollution
Richmond Park	<ul style="list-style-type: none"> • Stag beetle 	
Walthamstow Reservoirs	<ul style="list-style-type: none"> • Bittern <i>Botaurus stellaris</i> • Gadwall <i>Anas strepera</i> • Shoveler <i>Anas clypeata</i> 	<ul style="list-style-type: none"> • 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
Epping Forest	<ul style="list-style-type: none"> • Atlantic acidophilous beech forest • North Atlantic wet heaths with <i>Erica tetralix</i> • European dry heaths • Stag beetle 	<ul style="list-style-type: none"> • Air pollution • Declining epiphytic bryophyte populations due to the death of pollards, shading and pollution from acid rain, however the reintroduction of pollarding and wood pasture management is helping to reverse the decline

- 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 DRLLP is unlikely to have adverse effects on the European Sites and will not result in an adverse impact on the integrity on the four sites. A summary of the potential pathways is provided in Table 5 below.

Table 5: Potential Pathways to European Sites

Potential pathway to cause adverse effect – Y/ N?	Reasons
Recreational - No	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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 from the DRLLP is unlikely to result in adverse impacts on the integrity of the site
Atmospheric Pollution – No	<ul style="list-style-type: none"> • Natural England have previously advised 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	<ul style="list-style-type: none"> • 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 DRLLP 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 DRLLP does not exist in isolation; an in-combination assessment was also undertaken. Neighbouring borough HRA’s were reviewed including the HRA on the draft London Plan 2017. 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 DRLLP has not identified any likely significant adverse effects on any European Site. Similarly, it is considered that the DRLLP will not have an adverse impact on the integrity of the four sites. Therefore, the Appropriate Assessment stage is not required on the DRLLP for Lambeth borough. The council will seek the views of Natural England on the conclusion of this initial HRA screening assessment.