

**SP4.10**

**Habitats Regulations Assessment  
Sites and Policies and Policies Map  
(Part of Merton's local plan)  
Submission**

**September 2013**

## **1 Introduction**

- 1.1 In accordance with the Habitats Directive (92/43/EEC) Merton has to undertake screening exercises of the Site and Policies; and Policies Map (formally Proposal Map) development plan
- 1.2 This assessment is independent of the Sustainability Appraisal although, its findings will be noted in the report and this document will be submitted to the inspector as part of the evidence base for the Examination in Public (EiP).

### **Background**

- 1.3 The EU directive on the Conservation of Natural Habitats and Wild Fauna and Flora, also referred to as the 'Habitats Directive', provides legal protection for habitats of exceptional European importance. Article two of this directive requires the restoration and maintenance of habitats and species to a favourable conservation status and subsequent articles set up the means to designate protection areas. These are either set up as Special Areas of Conservation (SAC) or Special Protection Areas (SPA) depending on the protection aim.
- 1.4 In order that these designated areas are protected the Habitats Directive has set the requirement for plans and projects to be assessed for their likely impact on them; in order to ensure that they do not have a negative impact. The assessment is to ensure that any significant effects are identified and avoided.

### **The Process**

- 1.5 The Conservation (Natural Habitats &c) Regulations 1994 have been amended to implement a judgement of the European Court of Justice. The amended Regulations came into force in 2007. The effect of the Regulations (as amended) is to add Part IVA (Regulations 85A -85E) under the title "Appropriate Assessments for Land Use Plans in England and Wales".
- 1.6 The essential requirement of this amendment is for the Local Planning Authority (LPA) to assess the potential effects of land use plans, to ensure that the protection and integrity of European Sites is considered by the planning process at the local level. The process by which this is achieved is by way of a Habitats Regulations Assessment, to assess the impacts of a land-use plan against the conservation objectives of Sites, and to ascertain whether it would adversely affect the integrity of that site.
- 1.7 The European Sites network (also known as Natura 2000) provides for the protection of sites that are of exceptional importance for rare, endangered or vulnerable natural habitats and species within the European Community. These sites consist of Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Offshore Marine Site (OMS). Ramsar sites (wetlands of

international importance) are included as if they are fully designated European Sites for the purpose of considering development proposals that may affect them.

- 1.8 Article 6 (3) and (4) of the Directive states the requirement for assessment in order to determine whether the plan is *'likely to have a significant effect'* on a European Sites. 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 Appropriate Assessment need not be done in any more detail, or using more resources, than is useful for its purpose.”*

- 1.9 If, following the screening, the plan is determined to have significant effects on any European Sites then the plan will have to undergo a full Appropriate Assessment where alternative measures are suggested. The alternative measures should prevent the plan from undermining the conservation objectives of the European Sites.
- 1.10 The submission Sites and Polices and; Polices Map (formally Proposal Map) has been assessed in accordance with the criteria produced by Tydesley and Associates for Natural England entitled, *'The Habitats Regulations Assessment of Local Development Documents Revised Draft Guidance for Natural England – February 2009.'* The relevant sites have been identified and their features and impacts listed. Thereafter, the potential effects of each policy have been categorised according to the draft guidance. If any policies were considered to have likely significant effects, appropriate avoidance, cancellation or reduction measures would be considered.

**Appropriate Assessment: Key Tasks**

- 1.11 We used the methodology given in the Draft Guidance *'The Habitats Regulations Assessment of Regional Spatial Strategies and Sub-Regional Strategies'*, David Tyldesley and Associates, for Natural England (March 2007). This is one of several guidance documents available, but it represents a standardised methodology that endorsed by Natural England.
- 1.12 The process involves the following methodological steps:

**Table 1:** Habitats Regulation Assessment

Habitats Regulation Assessment	
<b>Stage1:</b> Screening	<ul style="list-style-type: none"> <li>• Identifying international site in and around the plan/strategy area</li> <li>• Examine conservation objectives (if available)</li> <li>• Analyse the policy/plan and its key</li> </ul>

<p><b>Stage 2:</b> Appropriate Assessment</p>	<p>components</p> <ul style="list-style-type: none"> <li>• Identify potential effects on European Sites</li> <li>• Examine other plans and programmes that could contribute to 'in combination' effects</li> <li>• <i>If no effects likely-report that no significant effect.</i></li> <li>• <i>If effects are judged likely or uncertainty exists- the precautionary principle applies proceed to <b>stage 2</b></i></li> </ul>
<p><b>Stage 3:</b> Assessment where no alternatives and adverse impacts remain</p>	<ul style="list-style-type: none"> <li>• Collate information on sites and evaluate impact in light of conservation objectives</li> <li>• Consider how plan 'in combination' with other plans and programmes will interact when implemented (the Appropriate Assessment)</li> <li>• Consider how effect on integrity of site could be avoided by changes to plan and the consideration of alternatives</li> <li>• Develop mitigation measures (including timescale and mechanisms)</li> <li>• <i>Report outcomes of AA and develop monitoring strategies</i></li> <li>• <i>If effects remain following the consideration of alternatives and development of mitigations proceed to <b>stage 3</b></i></li> <li>• Identify 'imperative reasons of overriding public interest' (IROPI)</li> <li>• Identify/ develop potential compensatory measures</li> <li>• Difficult test to pass, requirements are onerous and untested to date.</li> </ul>

1.13 Steps 1 and 2 are the stages reported on in this document.

1.14 The whole process is referred to as the 'Habitats Regulations Assessment' with 'Appropriate Assessment' forming a stage within it. If, at the screening stage it is determined that the land-use plan will not adversely affect the integrity of any international site, alone or in combination with other plans and projects, the

Appropriate Assessment stage of the process is not required, and it may proceed to publication.

- 1.15 This assessment of the Pre submission Site and Policy and; Policies Map under the Habitats Regulations was undertaken during the preparation of the local plan, so that the assessment has influenced the development of policies and their effects.

**Table 2: Habitat Regulation Screening Stages**

<b>HRA Screening Stage</b>	
<p><b>Task 1</b> Identification of European Sites and characterisation</p>	<ul style="list-style-type: none"> <li>• Identification of European Sites both within Merton’s boundary, within 15 km of the boundary and/or within the potential influence of the plan.</li> <li>• Information was obtained for each European Site, based on publicly available information and consultation with Natural England where appropriate.</li> <li>• This included information relating to the sites’ qualifying features; conservation objectives (where available) vulnerabilities/ sensitivities and geographical boundaries.</li> </ul>
<p><b>Task 2</b> Strategy review, policy screening and identification of likely impacts</p>	<ul style="list-style-type: none"> <li>• Screening of the policies and the identification of likely impacts (including a review of the strategy to determine likely impacts)</li> </ul>
<p><b>Task 3</b> Consideration of other plans and programmes</p>	<ul style="list-style-type: none"> <li>• Consideration, where appropriate, of other plans and programmes that may have in combination effects</li> </ul>
<p><b>Task 4</b> Screening Assessment</p>	<ul style="list-style-type: none"> <li>• Summary of screening outcomes and recommendations.</li> </ul>

**2 Background to the Sites and Policies; and Policies Map (formerly Proposal map)**

- 2.1 The development management policies give effect to the Merton’s Core Planning Strategy by detailing development requirements and constraints that will contribute to the delivery of Merton’s spatial strategy.
- 2.2 Upon adoption, polices within planning document will supersede the development management provisions of the Merton’s Unitary Development Plan (2003). It should be noted that the London Plan (2011) includes development management provisions that does form a part of the statutory

development plan for all London boroughs. Where, there are such provisions, it has not been necessary to duplicate these in Merton's Sites and Policies and Polices Map.

2.3 There have been a number of changes to national policy (Gypsies, Travellers and Travelling show people) and regional policy by the Mayor of London (Affordable rents), plus additional information from landowners and developers on proposal sites; which have bearing on the Pre submission Sites and Policies and; Polices Map.

2.4 This HRA will be assessing the following:

- The development management polices will guide planning decisions and access development proposals in Merton with Merton's Core Planning Strategy.
- The Polices *Map* (including development sites) sets out where development is anticipated in the borough that will contribute to the Merton's Core Planning Strategy objectives. The Polices Map includes land designations, specific polices or specific areas for example town centre boundaries, open space and protected areas.

#### **The in-combination assessment**

2.5 The assessment of significant effects of a policy need to take into account its impact in-combination with other plans and projects, such as the London Plan (Spatial Development Strategy for Greater London Authority) and those of adjacent local authorities.

#### **Consultation**

2.6 The Habitats Regulations requires the plan making/competent authority to consult with Natural England (Statutory body). the Habitats Regulations gives responsibility for consultation with other bodies and the public to the discretion of the plan making authority.

2.7 Where possible, guidance recommends that this consultation be undertaken alongside the consultation for the plan a copy of the HRA will also be sent to the Environment Agency for consideration and comment.

### **3 Identification of European Sites and characterisation**

3.1 The first steps was to identify the European Sites that may be affected by the land use plan and to acquire, examine and understand the conservation objectives of each interest feature of each site potentially affected. Natural England assisted in the identification of the relevant sites.

3.2 There are two sites, which are immediately relevant for Merton. One is within borough boundary, Wimbledon Common, and the other is Richmond Park (Royal Park) which is approximately 3-4km away. It has been agreed with Natural

England 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.

- 3.3 Beyond these two sites there are a number of sites outside London such as the Thames Basin Heaths, the Windsor Forest Great Park and the Mole Gap to Reigate Escarpment that are too distant to be considered relevant.
- 3.4 Apart of the South West London Water bodies are just within the 15km catchment. The only possible impact that the Site and Policy and; Policies I map could have on these habitats would be through run-off but given that the river catchment areas for the borough do not drain into the South West London Water bodies, any run-off impact is unlikely to occur.
- 3.5 Therefore, the potential impacts of the Site and Policy and; Policies Map will be screened with regard to the conservation objectives of Wimbledon Common and Richmond Park. The description and the reason for their designation are set out below Wimbledon *Common Special Area of Conservation*.
- 3.6 Much of Wimbledon Common is an SAC and SSSI. The common measures 348.31ha and is located 1.5km to the north west of Wimbledon town centre. The majority of the SAC is located within Merton and the smaller area of Putney Heath, within the London Borough of Wandsworth.
- 3.7 This SAC also borders the Royal Borough of Kingston upon Thames and consists of the following general habitat types:
- Inland water bodies (standing water, running water) (1%)
  - Bogs Marshes Water fringed vegetation. Fens (0.5%)
  - Heath Scrub Maquis and garrigue *Phygrana* (5%)
  - Dry grassland Steppes (45%)
  - Improved grassland (3.5%)
  - Broad-leaved deciduous woodland (45%)
- 3.8 Other key environmental assets of Wimbledon common:
- London Wildlife Trust managed Local Nature Reserve Fishpond Wood (managed
  - Largest area of wet heath in London, areas of dry heath and one of London's very few sphagnum bogs
  - High ground hosts an ancient tumulus, and an ancient monument, Caesar's Camp, can be seen near the Royal Wimbledon Golf Course.
- 3.9 Wimbledon Common has a large number of old trees and much fallen decaying timber. It is at the heart of the south London centre of distribution for the stag beetle, *Lucanus cervus*. The stag beetle is listed as an Annex II species in the Habitats Directive and is a primary reason for the designation of this site.

Wimbledon Common also supports a number of other scarce invertebrate species associated with decaying timber.

3.10 The following Annex I habitats are present as a qualifying feature however, are not a primary reason for designation of this site.

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

3.11 The Richmond Park one of two National Nature Reserves in London and is a SAC measures 846.68ha, of which 0.3ha is within the Royal Borough of Kingston upon Thames. The park is to the west of Wimbledon Common with the Beverley Brook and the A3 separating the two, along with a cemetery and a golf course. Unlike Wimbledon Common, the Royal Park is closed every night at dusk. The park consists of the following general habitat types:

- Inland water bodies (standing water, running water) (1.5%)
- Bogs. Marshes. Water fringed vegetation. Fens (0.5%)
- Heath. Scrub. Maquis and garrigue. *Phygrana* (25%)
- Dry grassland. Steppes (18%)
- Humid grassland. Mesophile grassland (5%)
- Improved grassland (20%)
- Broad-leaved deciduous
- Mixed Woodland (5%)

3.12 Other key environmental feature:

- Adjacent golf courses and commons provide additional areas of acid grassland and secondary woodland
- Fallow and Red deer grazing in the park

- 3.13 As with Wimbledon Common, Richmond Park has a large number of ancient trees with decaying timber. It is at the heart of the south London centre of distribution for the stag beetle, *Lucanus cervus*. The stag beetle is listed as an Annex II species in the Habitats Directive and is a primary reason for the designation of this site.
- 3.14 Tables 3 and 4 set out the two sites' designations more explicitly; their current condition, uses of the sites and the impacts. Further details can be found in Appendices 2 and 3.

### **Site descriptions**

- 3.15 Information for the sites including the rationale for their declaration as European Sites has been taken from the '*Appropriate Assessment for the London Plan*'. This also includes supplementary information to assist in the assessment of the significance of any impacts of policies on their nature conservation interest.

### **Potential impact on the European Sites**

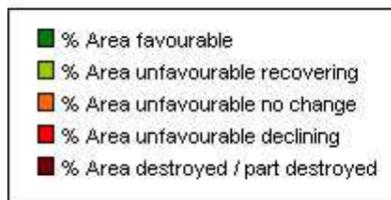
- 3.16 Both European Sites within Merton's catchment have been designated primarily due to the presence of Stag beetles and Wimbledon Common for some secondary habitat protection. The main impacts identified are related to the potential increased recreational use and the secondary impacts would be due to air pollution, increase in housing provision and transport use.
- 3.17 Stag Beetles are dependent on mature trees and deadwood and there is therefore, less concern that recreation will have an unduly detrimental impact on their habitat. The designated wet and dry heaths on Wimbledon Common could however, be affected by trampling from walkers or other recreational users. However, the management of the common and park, respectively by the Wimbledon Common and Putney Heath Conservators and the Royal Parks Authority, by for instance, dog control orders and other appropriate byelaws would be most relevant with regards to this potential impact.

**Table 3:** Wimbledon Common assessment (compiled August 2013)

Borough	Main habitat	Latest assessment date	Assessment description	Condition assessment comment
Merton	Acid grassland - lowland	11 Jun 2009	Unfavourable recovering	The heathland in this unit is currently not meeting the conservation objectives for the site. The age class diversity of <i>Calluna vulgaris</i> is poor, with little pioneer vegetation recorded compared to a high proportion of degenerate heather. There is a low diversity and frequency of desirable forbs across the heathland. The cover of <i>M.caerulea</i> within the dwarf shrub stands was within target, however <i>M.caerulea</i> was dominant in large areas between existing stands, limiting species diversity and encroaching into new areas. Whilst cover of tress and scrub within the remaining open heath is within target, the total cover across the unit needs to be reduced so that the extent of open heath is increased. The unit is covered by a HLS agreement that will improve the current resource and create new areas of heath. A timeframe for this work has been agreed in the heathland management plan. Therefore the unit has been recorded as unfavourable recovering condition.
Merton	Broadleaved, mixed and yew woodland - lowland	02 Mar 2009	Unfavourable recovering	The acid grassland in the unit was assessed in June 2008. It did not meet the target for sward composition: frequency of positive indicator species/taxa, with only 1 species recorded as frequent and 1 recorded as rare. The grassland passed all other targets. The grassland is in positive management under a HLS scheme so has been placed in recovering condition.
Merton	Dwarf shrub heath - lowland	20 Jul 2010	Unfavourable declining	No information from Natural England.

**Table 4:** Wimbledon Common condition summary (compiled August 2013)

% Area meeting PSA target	% Area favourable	% Area unfavourable recovering	% Area unfavourable no change	% Area unfavourable declining	% Area destroyed / part destroyed
94.99%	0.00%	94.99%	0.00%	5.01%	0.00%



**Table 5: Richmond Park assessment (Compiled: August 2013)**

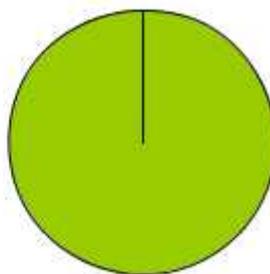
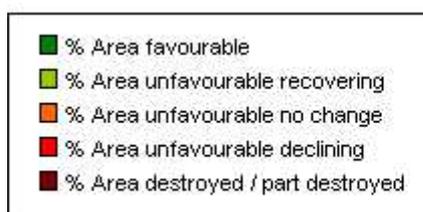
Main habitat	Unit area (ha)	Latest assessment date	Assessment description	Condition assessment comment
Acid grassland - lowland	114.67	27 Oct 2010	Unfavourable recovering	The Royal Parks have developed a grassland management strategy which, when implemented, will result in an improvement in the condition of the areas of acid grassland in the park
Broadleaved, mixed and yew woodland - lowland	3.03	19 May 2010	Unfavourable recovering	The unit was assessed as a component part of the wider lowland parkland and wood pasture habitat supporting invertebrate assemblages. As such the unit does not contain all features necessary to support the assemblage. The assessment of the habitat as a whole follows: SRS assessment: Average of 4.3 surfaces across the site. Average of 4 surfaces for the unit. Preferred surfaces for the site as a whole: Scrub: Less than 10% across the site. However there are a number of enclosures which have allowed the development of hawthorn and gorse scrub for example. Tree age structure: Across the site there are fewer saplings than veteran trees. There are greater than 25% of middle aged trees as there are veterans. The shortage of saplings is being addressed through a program of tree planting. Nectar sources: Less than 10% of the sward is able to flower across the site due to deer grazing. However, new enclosures in the open parkland and woodland management in closed woodland areas will result in ground flora development. Dead Wood, No. of veteran trees: A baseline of 1517 trees was established in a 2008 Royal Parks survey. Dead Wood, No of tree with attached dead wood: Most veteran trees observed had a significant amount of attached deadwood greater than 20cm diameter. Dead organic matter: This was variable across the site, in much of the parkland, cover was 5-10% Negative factors: Rhodendron cover in many of the enclosed woodlands. This is being addressed through a program of clearance. High bracken coverage increases fire risk. Bracken is being controlled through herbicide spraying and periodic rolling. Poor age structure of trees: This is being addressed through a tree planting program. The unit provides good levels of scrub, lying dead wood but has a closed canopy and is very shaded. Garden escapes and rhododendron are a problem.
Acid grassland - lowland	153.60	27 Oct 2010	Unfavourable recovering	The Royal Parks have developed a grassland management strategy which, when implemented, will result in an improvement in the condition of the areas of acid grassland in the park
Acid grassland - lowland	205.21	27 Oct 2010	Unfavourable recovering	The Royal Parks have developed a grassland management strategy which, when implemented, will result in an improvement in the condition of the areas of acid grassland in the park
Broadleaved, mixed and yew woodland - lowland	29.34	18 May 2010	Unfavourable recovering	The unit was assessed as a component part of the wider lowland parkland and wood pasture habitat supporting invertebrate assemblages. As such the unit does not contain all features necessary to support the assemblage. The assessment of the habitat as a whole follows: SRS assessment: Average of 4.3 surfaces across the site. Average of 4 surfaces for the unit. Preferred surfaces for the site as a whole: Scrub: Less than 10% across the site. However there are a number of enclosures which have allowed the development of hawthorn and gorse scrub for example. Tree age structure: Across the site there are fewer saplings than veteran trees. There are greater than 25% of middle aged trees as there are veterans. The shortage of saplings is being addressed through a program of tree planting. Nectar sources: Less than 10% of the sward is able to flower across the site due to deer grazing. However, new enclosures in the open parkland and woodland management in closed woodland areas will result in ground flora development. Dead Wood, No. of veteran trees: A baseline of 1517 trees was established in a 2008 Royal Parks survey. Dead Wood, No of tree with attached dead wood: Most veteran trees observed had a significant amount of attached deadwood greater than 20cm diameter. Dead organic matter: This was variable across the site, in much of the parkland, cover was 5-10% Negative factors: Rhodendron cover in many of the enclosed woodlands. This is being addressed through a program of clearance. High bracken coverage increases fire risk. Bracken is being controlled through herbicide spraying and periodic rolling. Poor age structure of trees: This is being addressed through a tree planting program. The unit provides nectar sources: bramble, rhododendron and has a high proportion of young oak and birch trees but few saplings
Broadleaved, mixed and yew woodland - lowland	4.66	19 May 2010	Unfavourable recovering	The unit was assessed as a component part of the wider lowland parkland and wood pasture habitat supporting invertebrate assemblages. As such the unit does not contain all features necessary to support the assemblage. The assessment of the habitat as a whole follows: SRS assessment: Average of 4.3 surfaces across the site. Average of 4 surfaces for the unit. Preferred surfaces for the site as a whole: Scrub: Less than 10% across the site. However there are a number of enclosures which have allowed the development of hawthorn and gorse scrub for example. Tree age structure: Across the site there are fewer saplings than veteran trees. There are greater than 25% of middle aged trees as there are veterans. The shortage of saplings is being addressed through a program of tree planting. Nectar sources: Less than 10% of the sward is able to flower across the site due to deer grazing. However, new enclosures in the open parkland and woodland management in closed woodland areas will result in ground flora development. Dead Wood, No. of veteran trees: A baseline of 1517 trees was established in a 2008 Royal Parks survey. Dead Wood, No of tree with attached dead wood: Most veteran trees observed had a significant amount of attached deadwood greater than 20cm diameter. Dead organic matter: This was variable across the site, in much of the parkland, cover was 5-10% Negative factors: Rhodendron cover in many of the enclosed woodlands. This is being addressed through a program of clearance. High bracken coverage increases fire risk. Bracken is being controlled through herbicide spraying and periodic rolling. Poor age structure of trees: This is being addressed through a tree planting program. The unit provides good levels of scrub and has a good age structure. Overall volume of fallen timber is high
Broadleaved, mixed and yew woodland - lowland	7.86	19 May 2010	Unfavourable recovering	The unit was assessed as a component part of the wider lowland parkland and wood pasture habitat supporting invertebrate assemblages. As such the unit does not contain all features necessary to support the assemblage. The assessment of the habitat as a whole follows: SRS assessment: Average of 4.3 surfaces across the site. Average of 4 surfaces for the unit. Preferred surfaces for the site as a whole: Scrub: Less than 10% across the site. However there are a number of enclosures which have allowed the development of hawthorn and gorse scrub for example. Tree age structure: Across the site there are fewer saplings than veteran trees. There are greater than 25% of middle aged trees as there are veterans. The shortage of saplings is being addressed through a program of tree planting. Nectar sources: Less than 10% of the sward is able to flower across the site due to deer grazing. However, new

				enclosures in the open parkland and woodland management in closed woodland areas will result in ground flora development. Dead Wood, No. of veteran trees: A baseline of 1517 trees was established in a 2008 Royal Parks survey. Dead Wood, No of tree with attached dead wood: Most veteran trees observed had a significant amount of attached deadwood greater than 20cm diameter. Dead organic matter: This was variable across the site, in much of the parkland, cover was 5-10% Negative factors: Rhododendron cover in many of the enclosed woodlands. This is being addressed through a program of clearance. High bracken coverage increases fire risk. Bracken is being controlled through herbicide spraying and periodic rolling. Poor age structure of trees: This is being addressed through a tree planting program. The unit provides good levels of scrub, young and middle aged trees. Ground flora provides good nectar sources. Rhododendron is a problem in this unit.
Acid grassland - lowland	205.12	27 Oct 2010	Unfavourable recovering	The Royal Parks have developed a grassland management strategy which, when implemented, will result in an improvement in the condition of the areas of acid grassland in the park
Broadleaved, mixed and yew woodland - lowland	5.82	19 May 2010	Unfavourable recovering	The unit was assessed as a component part of the wider lowland parkland and wood pasture habitat supporting invertebrate assemblages. As such the unit does not contain all features necessary to support the assemblage. The assessment of the habitat as a whole follows: SRS assessment: Average of 4.3 surfaces across the site. Average of 4 surfaces for the unit. Preferred surfaces for the site as a whole: Scrub: Less than 10% across the site. However there are a number of enclosures which have allowed the development of hawthorn and gorse scrub for example. Tree age structure: Across the site there are fewer saplings than veteran trees. There are greater than 25% of middle aged trees as there are veterans. The shortage of saplings is being addressed through a program of tree planting. Nectar sources: Less than 10% of the sward is able to flower across the site due to deer grazing. However, new enclosures in the open parkland and woodland management in closed woodland areas will result in ground flora development. Dead Wood, No. of veteran trees: A baseline of 1517 trees was established in a 2008 Royal Parks survey. Dead Wood, No of tree with attached dead wood: Most veteran trees observed had a significant amount of attached deadwood greater than 20cm diameter. Dead organic matter: This was variable across the site, in much of the parkland, cover was 5-10% Negative factors: Rhododendron cover in many of the enclosed woodlands. This is being addressed through a program of clearance. High bracken coverage increases fire risk. Bracken is being controlled through herbicide spraying and periodic rolling. Poor age structure of trees: This is being addressed through a tree planting program. The unit provides good levels of scrub, young and middle aged trees. Ground flora provides good nectar sources. Little dead wood evident, however abundant dead wood attached to trees.
Broadleaved, mixed and yew woodland - lowland	22.52	19 May 2010	Unfavourable recovering	The unit was assessed as a component part of the wider lowland parkland and wood pasture habitat supporting invertebrate assemblages. As such the unit does not contain all features necessary to support the assemblage. The assessment of the habitat as a whole follows: SRS assessment: Average of 4.3 surfaces across the site. Average of 4 surfaces for the unit. Preferred surfaces for the site as a whole: Scrub: Less than 10% across the site. However there are a number of enclosures which have allowed the development of hawthorn and gorse scrub for example. Tree age structure: Across the site there are fewer saplings than veteran trees. There are greater than 25% of middle aged trees as there are veterans. The shortage of saplings is being addressed through a program of tree planting. Nectar sources: Less than 10% of the sward is able to flower across the site due to deer grazing. However, new enclosures in the open parkland and woodland management in closed woodland areas will result in ground flora development. Dead Wood, No. of veteran trees: A baseline of 1517 trees was established in a 2008 Royal Parks survey. Dead Wood, No of tree with attached dead wood: Most veteran trees observed had a significant amount of attached deadwood greater than 20cm diameter. Dead organic matter: This was variable across the site, in much of the parkland, cover was 5-10% Negative factors: Rhododendron cover in many of the enclosed woodlands. This is being addressed through a program of clearance. High bracken coverage increases fire risk. Bracken is being controlled through herbicide spraying and periodic rolling. Poor age structure of trees: This is being addressed through a tree planting program. The unit provides good nectar sources through planted shrubberies. There are many planted saplings and middle aged trees but few old/veteran trees. Dead wood resource was scarce
Acid grassland - lowland	57.27	27 Oct 2010	Unfavourable recovering	The Royal Parks have developed a grassland management strategy which, when implemented, will result in an improvement in the condition of the areas of acid grassland in the park
Broadleaved, mixed and yew woodland - lowland	18.75	19 May 2010	Unfavourable recovering	The unit was assessed as a component part of the wider lowland parkland and wood pasture habitat supporting invertebrate assemblages. As such the unit does not contain all features necessary to support the assemblage. The assessment of the habitat as a whole follows: SRS assessment: Average of 4.3 surfaces across the site. Average of 4 surfaces for the unit. Preferred surfaces for the site as a whole: Scrub: Less than 10% across the site. However there are a number of enclosures which have allowed the development of hawthorn and gorse scrub for example. Tree age structure: Across the site there are fewer saplings than veteran trees. There are greater than 25% of middle aged trees as there are veterans. The shortage of saplings is being addressed through a program of tree planting. Nectar sources: Less than 10% of the sward is able to flower across the site due to deer grazing. However, new enclosures in the open parkland and woodland management in closed woodland areas will result in ground flora development. Dead Wood, No. of veteran trees: A baseline of 1517 trees was established in a 2008 Royal Parks survey. Dead Wood, No of tree with attached dead wood: Most veteran trees observed had a significant amount of attached deadwood greater than 20cm diameter. Dead organic matter: This was variable across the site, in much of the parkland, cover was 5-10% Negative factors: Rhododendron cover in many of the enclosed woodlands. This is being addressed through a program of clearance. High bracken coverage increases fire risk. Bracken is being controlled through herbicide spraying and periodic rolling. Poor age structure of trees: This is being addressed through a tree planting program. The unit provides good dead wood resource - lying fallen timber, stumps and loggeries. There is a poor scrub layer and few saplings/young trees. Nectar sources are in short supply. Rhododendron is present but not widespread.
Broadleaved, mixed and yew woodland - lowland	18.76	19 May 2010	Unfavourable recovering	The unit was assessed as a component part of the wider lowland parkland and wood pasture habitat supporting invertebrate assemblages. As such the unit does not contain all features necessary to support the assemblage. The assessment of the habitat as a whole follows: SRS assessment: Average of 4.3 surfaces across the site. Average of 4 surfaces for the unit. Preferred surfaces for the site as a whole: Scrub: Less than 10% across the site. However there are a number of enclosures which have allowed the development of hawthorn and gorse scrub for example. Tree age structure: Across the site there are fewer saplings than veteran trees. There are greater than 25% of middle aged trees as there are veterans. The shortage of saplings is being addressed through a program of tree planting. Nectar sources: Less than 10% of the sward is able to flower across the site due to deer grazing. However, new enclosures in the open parkland and woodland management in closed woodland areas will result in ground flora development. Dead Wood, No. of veteran trees: A baseline of 1517 trees

				<p>was established in a 2008 Royal Parks survey. Dead Wood, No of tree with attached dead wood: Most veteran trees observed had a significant amount of attached deadwood greater than 20cm diameter. Dead organic matter: This was variable across the site, in much of the parkland, cover was 5-10% Negative factors: Rhodendron cover in many of the enclosed woodlands. This is being addressed through a program of clearance. High bracken coverage increases fire risk. Bracken is being controlled through herbicide spraying and periodic rolling. Poor age structure of trees: This is being addressed through a tree planting program. The unit provides good dead wood resource - a high proportion of trees have signs of decay/hollowing and the quantity of fallen timber is good. Many of the logs are in open and dapped conditions. Scrub resource is poor.</p>
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**Table 6:** Richmond Park condition summary (compiled August 2013)

% Area meeting PSA target	% Area favourable	% Area unfavourable recovering	% Area unfavourable no change	% Area unfavourable declining	% Area destroyed / part destroyed
100.00%	0.00%	100.00%	0.00%	0.00%	0.00%



3.18 Table 3 and 5 contains details of the known sensitivities / vulnerabilities of the European Sites. The following sections summarise the effects which could be relevant to the proposals that occur within the Sites and Polices Plan and Polices Map. A review of the policies, site allocation and town centre boundaries has been undertaken and those where effects have been identified are discussed further in section 3.

#### 4 Strategy review, policy screening and identification of likely impacts (Task 2)

##### All London Green Grid (ALGG): Wandle Valley area framework

- 4.1 The Wandle Valley Regional Park area framework sets out a vision for the creation and improvement of a linked network of open spaces along the river corridor. The park will connect to town centres, transport hubs, communities and business areas, extending out to connect to the open spaces in the surrounding area.
- 4.2 This includes Mitcham Common, a large area of grassland and woodland, which added to the proposed new country park, would provide an extensive open space corridor to Beddington Park in the south. The protection and restoration of the river corridor's natural qualities will play an important role in making a vital and vibrant piece of green infrastructure in this area in London.
- 4.3 The objectives for the Wandle Valley Area Framework is to achieve the vision and maximise the benefits of the network include:
- increasing access to open space
  - increasing access to nature
  - managing flood risk and urban heat
  - making sustainable travel connections
  - enhancing distinctive visitor destinations and boosting the visitor economy
  - promoting healthy living
  - enhancing green space and GI sector skills
  - promoting sustainable food production

- promoting quality of design, management and maintenance
- enhancing heritage features and landscape character
- improving air quality and sound scapes.

4.4 The ALGG is not a stand alone and isolated network, its key objective is to integrate it with other strategic economic and environmental programmes and plans; with the aim to maximise the synergy between attractive and multifunctional open spaces, the links and corridors between them and other development programmes highlighted in the London Plan. These include Opportunity Areas, Areas of intensification, and Strategic Outer London Development Centres.

It is not envisaged that the ALGG will have an adverse impact to the European Sites as mentioned earlier the ALGG is in conformity with the London Plan.

#### **Air Pollution and quality**

4.5 The primary source of air pollution in the borough is transport related. Air pollution threats (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)

- Wimbledon Common – air pollution is thought to be having an impact on heathland habitat.

4.6 The National Air Quality Strategy (NAQS) establishes the framework for air quality improvements. Measures agreed at the national and international level are the foundations on which the strategy is based.

4.7 It is recognised, however, that despite these measures, areas of poor air quality will remain, and that these will best be dealt with using local measures implemented through the LAQM regime.

4.8 Therefore, the role of local authorities' review and assessment process is to identify all those areas where the air quality objectives are being or are likely to be exceeded. Experience has shown that such areas may range from single residential properties to whole town centres.

4.9 The air quality objectives applicable to LAQM are set out separately in Air Quality Regulations for England, Scotland, Wales and Northern Ireland

4.10 In accordance, with the NAQS the London Plan air policy seeks a reduction in air pollution which could have a beneficial effect on European Sites. The specific need for avoidance of likely adverse effects on the integrity of European Sites is addressed through the London plan policy 7.14 'Improving air quality' policy which recognises the importance of tackling air pollution and improving air quality to London's developments and furthermore the health and wellbeing of those living and working in London.

4.11 To meet the aims of the National Air Quality Objectives, the Merton council has designated the entire borough of Merton as an Air Quality Management Area

(AQMA). Therefore, development that may result in an adverse impact to local air quality may require an Air Quality Impact Assessment in order for the council to consider any possible pollution impact linked to development proposals.

- 4.12 Furthermore, Merton has an adopted Air Quality Action Plan in place and the borough is within a Low Emissions Zone and air quality is currently monitored through the Authority Monitoring Report (AMR).

### **Drainage and Water Pollution**

- 4.13 Drainage and water pollution are issues which need to be addressed for any development proposal; and will include appropriate and accepted mitigation subjected to regulatory controls to ensure that adverse impact on integrity of European Sites from water pollution do not occur.
- 4.14 Such development will be subject to Habitats Regulations Assessment if it is in an area where a European Sites could be affected.
- 4.15 The London Plan policy 5.13 Sustainable Drainage states '*Development should utilise sustainable urban drainage systems (SuDS) unless there are practical reasons for not doing so....*,'
- 4.16 In addition policy 5.14 (London Plan) Water Quality and wastewater infrastructure seeks to ensure that London has adequate and appropriate wastewater infrastructure; and protect and improve water quality having regard to the Thames River Basin Management Plan.
- 4.17 The London Plan goes further and instructs LDF's documents (now known as local plan documents) should be in line with the Flood and Water Management Act 2010, utilise Surface Water Management Plans to identify areas where management issues and develop actions and policy approaches aimed at reducing these risks.
- 4.18 Additionally, Merton's Core Planning Strategy identifies the councils approach to managing flood risk in the borough. The Core Planning Strategy strategic objective 6 is to make Merton an exemplary borough in mitigating and adapting to climate change and to make it a more attractive and green place.
- 4.19 In line with the strategic objective 6 and the London Plan, Merton's Core Planning Strategy *CS16 policy Flood Risk Management c)* requires the implementation of SuDS across the borough and to work towards effective management of surface water flooding.
- 4.20 The Sustainability Appraisal for the Core Planning Strategy concluded that CS16 policy:
- At the strategic level, the Core Strategy has been informed by a Flood Risk Assessment. In addition, Policy 16 Flood Risk Management will ensure individual development proposals will have no adverse impact and that essential community infrastructure will be at less risk of damage.*
- 4.21 The Core Planning Strategy Habitat Regulation Assessment concluded that the policy:

*..... is intended to conserve or enhance the natural, built or historic environment, where enhancement measures will not be likely to have any negative effect on European Sites.*

4.22 In addition, development policy *DM F2 Sustainable drainage (SuDS)* policy aim is to reduce discharge into the drainage system and reduce the boroughs susceptibility to surface water in line with the NPPF and The Flood and Water Management Act 2010.

4.23 The Site and policies Habitat Regulation Assessment concluded that the policy:

*....met a number of the sustainability objectives that relate to the safeguarding and promotion of the natural environment, by ensuring individual development proposals will have no adverse impact, that essential infrastructure will not be at risk and reduce the risk of existing surface water flooding and to help reduce future problems.*

4.24 More importantly, the all the flood management policies state clearly that they would work closely with the Environment Agency on all flooding matters. Therefore, the impact to the European Sites is minimal and is unlikely to have an adverse impact to the European Sites.

#### **Visitor Pressure**

4.25 The habitats and species of the European Sites are known to be sensitive to recreational pressure primarily dog walking; such pressure is already an issue of concern. Although, the London Plan and the Core Planning Strategy could influence this sensitivity by increasing the number of people accessing the European Sites, due to the potential increases in housing development and employment.

4.26 However, the management of the common and park, respectively by the Wimbledon Common and Putney Heath Conservators and the Royal Parks Authority, by means of bylaws such as dog control orders mitigate against the potential impacts from increased recreational use

4.27 Another, contributor for a potential adverse impact to the Europeans site can be found in policy 2.13 of the London Plan *the promotion of Opportunity Areas and Intensification Areas.*

- 4.28 The London Plan identifies Intensification Area (AI) in Roehampton and an Opportunity Area (OA) in Vauxhall Nine Elms both are in the borough of Wandsworth. These two sites could potentially have an adverse impact to the European Sites and are considered part of this HRA assessment.
- 4.29 Neither site is likely to have an adverse impact on the European Sites. Although, it must be recognised at the time of writing this report no detailed planning application had been submitted to Wandsworth council. However, any development proposal would need to be in conformity to Wandsworth's local development plan, namely the Core Strategy and any other local development plans, all of which would be subject to SA and HRA.
- 4.30 Furthermore, Wandsworth council adopted a Supplementary Planning Document on the Vauxhall Area which was adopted by Wandsworth full council in January 2013. Even though, it is not necessary to carry out a SA for a SPD, one was carried out. The SA was carried out by Lambert, Hampton and Smith on behalf of Wandsworth council (September 2012).
- 4.31 The Vauxhall SPD's SA, main emphasis was to identify the sustainability issues and what the impacts may be of delivering the principles and character area indicative proposals in Vauxhall, whether these are positive or negative. Where negative impacts are thought to occur mitigation measures are recommended.
- 4.32 The SA for the Vauxhall Area SPD found that overall; the principles for the redevelopment of the area are likely to have positive effects of improving the 'sustainability credentials of the area'.

## **5 Consideration of other plans and programmes (Task 3)**

- 5.1 It is a requirement of Article 6(3) of the Habitats Directive that a HRA examines the potential for plans, strategies and programmes to have a significant effect either individually or 'in combination' with other plans and programmes. Undertaking an assessment of other plans and programmes requires a pragmatic approach (given the extensive range of plans and programmes underway in the region).
- 5.2 For this screening, consideration of other plans and programmes has focused on those likely to lead to significant infrastructure/ development changes with related impacts.
- 5.3 This screening exercise also requires that planning brief proposals be considered in combination with the effects of other plans or projects. It should be noted that any appropriate development in Merton are in conformity with and reflect the strategic objectives, targets and policies set out in The London Plan; and in line with the provision of Merton's Core Planning Strategy.
- 5.4 The *in-combination* effect of all planning documents, in the interest of the identified SACs and SPAs, should be no greater than the effect of the Core Planning Strategy and where new developments plans are prepared; these will be subject to additional HRA.
- 5.5 The Merton's Core Planning Strategy Habitat Assessment concluded:

*“Subsequent to the amendment of CS 9 Housing Provision, none of polices in the Core Planning Strategy are likely to result in significant adverse impact of European Sites. In particular, the potential primary impact, from increased recreation use, will not have an impact on the main reason for designation of the sites (the protection of stag beetle habitats) and there is therefore no need to undertake task two and task three of the Appropriate Appraisal process.”*

5.6 Whereas, the South London Waste Plan Habitat Regulation Assessment concluded:

*“In particular, the polices, on their own or in combination with any other relevant plans and projects, are unlikely to result in significant effect on the primary reasons for the designation of the European Sites and there is therefore no need to undertake task two and task three of the Appropriate Appraisal process”*

### **In combination assessment**

5.7 The ‘in combination’ assessment has taken into account neighbouring local planning authorities local plans including:

- Royal Borough of Richmond upon Thames
- Royal Borough of Kingston upon Thames
- London Borough of Sutton
- London Borough of Wandsworth
- London Borough of Croydon

5.8 Table 7 sets out the relevant plans and projects that may have an ‘in combination’ effect with the Sites and Policies and; Polices Map. It focuses on housing delivery policies in neighbouring borough’s Core Planning Strategies.

**Table 7:** Merton’s neighbouring boroughs housing delivery

<b>Borough</b>	<b>Local plan</b>	<b>Proposal</b>
London Borough of Sutton	Sites Development – submitted 2011 Core Strategy and Proposal Map adopted 2009	3,450 net additional dwellings by 2016-17. Broad locations are as follows: <ul style="list-style-type: none"> <li>• Sutton town centre – 2,000 to 2,150 units</li> <li>• Hackbridge - 1,000 to 1,100 units</li> <li>• Wallington – 500 to 550 units</li> <li>• Other District Centres – 500 to 550 units</li> <li>• Remainder of the Borough – 1,000 to 1,100 units.</li> </ul> <p>HRA Screening Assessment concluded no likely significant effects on European Sites.</p>
London Borough of Wandsworth	Core Strategy adopted 2010 Site Specific Allocation Development Management Polices	Provision for at least 7,500 net additional homes between 2007/08 and 2016/17. 3,750 net additional homes in the borough between 2017/18 and 2021/22. <ul style="list-style-type: none"> <li>• Central Wandsworth and the Wandle delta - 2000</li> <li>• Vauxhall/Nine Elms/Battersea Opportunity Area - 10000</li> </ul>

Borough	Local plan	Proposal
		<ul style="list-style-type: none"> <li>• 1000 on other sites on the Thames riverside,</li> <li>• Clapham Junction - 500</li> <li>• 1000 in and around the other town centres</li> <li>• 1500 elsewhere in the borough.</li> </ul> <p>HRA Screening Assessment concluded no likely significant on European Sites.</p>
London Borough of Lambeth	Core Strategy adopted 2011 Site Allocation Development Plan –issues and options	<p>The provision of at least 7,700 net additional dwellings across the borough between 2010/11 and 2016/17 in line with London Plan targets, and a further 8,800 more homes by 2024/25 subject to London Plan targets for this period.</p> <p>HRA Screening Assessment concluded no significant adverse impacts on European Sites.</p>
Royal Borough of Kingston upon Thames	Core Strategy – Pre submission 2011 Proposal Map Pre submission 2011	<p>5625 new homes proposed for 2012/13 to 2026/27. Estimated capacity of 2670 home in the following areas:</p> <ul style="list-style-type: none"> <li>• Chessington South/Leatherhead Rd Area 100</li> <li>• Tolworth Area 700</li> <li>• New Malden District Centre 120</li> <li>• Surbiton District Centre 150</li> <li>• Ewell Rd/King Charles Area 50</li> <li>• Villiers Road Area 50</li> <li>• Norbiton Area 500</li> <li>• Kingston Town Centre 1000</li> </ul> <p>HRA Screening Assessment concluded no significant adverse impacts on European Sites.</p>
London Borough of Richmond	Development Management – submitted 2011 Core Strategy adopted 2009	<p>2,700 new homes proposed 2007-2017. 150-330 homes per annum thereafter. Broad areas for housing:</p> <ul style="list-style-type: none"> <li>• Richmond - 700-1100</li> <li>• Twickenham - 700-1100</li> <li>• Teddington and the Hamptons - 700-800</li> <li>• Whitton - 400</li> <li>• East Sheen – 300</li> </ul> <p>HRA Screening Assessment concluded no significant adverse impacts on European Sites.</p>
London Borough of Croydon	Core Strategy – Submitted 2011 Draft Sites Allocation Draft Development Management Policies	<p>Provision for at least 20,200 home provisions 2001-2031.</p> <ul style="list-style-type: none"> <li>• 13,300 minimum homes between 2011 and 2021.</li> <li>• 6,900 between 2021 and 2031</li> </ul> <p>HRA Screening Assessment concluded no significant adverse impact on European Sites.</p>

- 5.9 As highlighted in the table above all the neighbouring boroughs concluded in their Core Planning Strategy: HRA screening that their housing delivery policies are unlikely to have a negative impact on the European Sites.
- 5.10 The *in-combination* assessment also incorporated an assessment of neighbouring boroughs transport proposals, policies and supporting maps/diagrams to see if any major transport infrastructure proposals are located on or close by to the adjoining boundaries of neighbouring boroughs of Merton, as together they could have the potential to have an impact upon European Sites.

**Table 8:** In combination Assessment

Plan	Proposals
Royal Borough of Richmond upon Thames	There are no transport proposals identified on or around the adjoining boundary with Merton therefore, it is highly unlikely that there will be any adverse impact <i>in combination</i> with Merton's Sites and Polices and; Polices Map.
London Borough of Sutton	There are no transport proposals identified on or around the adjoining boundary with Merton therefore, it is highly unlikely that there will be any adverse impact <i>in combination</i> with Merton's Sites and Polices and; Polices Map.
London Borough of Wandsworth	There are no transport proposals identified on or around the adjoining boundary with Merton therefore, it is highly unlikely that there will be any adverse impact <i>in combination</i> with Merton's Sites and Polices and; Polices Map.
London Borough of Croydon	There are no transport proposals identified on or around the adjoining boundary with Merton therefore, it is highly unlikely that there will be any adverse impact in combination with Merton's Sites and Polices and; Polices Map
London Borough of Lambeth	There are no transport proposals identified on or around the adjoining boundary with Merton therefore, it is highly unlikely that there will be any adverse impact in combination with Merton's Sites and Polices and; Polices Map

- 5.11 Merton's second Local Implementation Plan (LIP2) has been developed in response to the revised Mayor's Transport Strategy 2010. As it is the transport strategy for the borough; it therefore is in conformity with Merton's Core Planning Strategy and furthermore the Mayor of London Transport Strategy.
- 5.12 LIP2 identifies how the council will implement the Mayor's Transport Strategy at a local level. Table 9 below sets out the potential effects of the development polices in combination with LIP2. The factors identified were:
- Local and diffuse air pollution (specifically NOx)
  - Direct land take
  - Housing pressure and disturbance
  - Invasive and/or non-native species
  - Water quality and quantity

**Table 9:** Merton’s Local Implementation Plan (LIP2) impact on SAC and SPA sites

Plan Name	European sites which could be affected by plan	How could they be affected	Likely effect SAC and SPA sites.
Sustainable Transport Strategy and Local Implementation Plan (LIP2)	Richmond Park SAC	Diffuse air pollution Local air pollution	No.
	Wimbledon Common SAC		This plan seeks to develop a sustainable transport network in the borough which will lessen congestion, improve access and promote sustainable forms of transport thus improving air quality and reducing diffuse air pollution
	Part of the South West London Bodies SPA		
		Direct land take	No

## 6 Screening Assessment (Task 4)

- 6.1 In line with the screening requirements of the Habitats Regulations, an assessment was undertaken to determine the potential significant effects of potential sites on the integrity of the European Sites that lie within the potential influence of the plan.

### Screening Methodology

- 6.2 This section of the report covers the screening assessment of the policies within the planning document. The planning document has been analysed to assess whether development proposed in the planning document would be likely to result in significant adverse impacts on European Sites within the Merton catchment area as identified in section 4.
- 6.3 It is unlikely, that any of the draft site allocations would have an adverse impact the European Sites based on the criteria set out in section 5 of the revised draft Natural England guidance prepared by Tyldesley and Associates 2009.
- 6.4 This assumption is formed by firstly identifying the European Sites (section 3) and using the catchment area (15km), which helps us to understand how land use and development may affect land that is outside the plans boundary.
- 6.5 Furthermore, looking outside the HRA boundary area (the borough boundary and the 15km catchment area) that may be affected, in the case of Merton this would be the neighbouring boroughs.
- 6.6 In addition, if we look at areas outside the HRA boundary that maybe affected, for example, through related infrastructure for example water supply reservoirs or

treatment works of other waste stream infrastructure that received waste or discharge from the plan area.

- 6.7 It is considered that such development in conjunction with ‘**sound evidence**’ namely The South London Waste plan, the HRA carried out on the Waste Plan and the London Plan; is unlikely to adverse impact to the European Sites.
- 6.8 Also, considered was the Thames Basin Heaths, the Windsor Forest Great Park and the Mole Gap to Reigate Escarpment however, due to the location these sites are too distant to be considered relevant.
- 6.9 The guidance also advises that where uncertainty is encountered a precautionary approach should be adopted with worst outcomes assumed.

### Development Management Policies Screening Assessment

**Table 10:** Development Management Policies Screening Assessment

Policy	Assessment category	Comment
<b>DM R1:</b> Location and scale of development in Merton’ town centres and neighbourhood parades.	<b>A3</b>	This policy is intended to conserve or enhance the natural, built or historic environment, where enhancement measures will not be likely to have any negative effect on European Site
<b>DM R2:</b> Development of centre types use outside centres	<b>A3</b>	This policy is intended to conserve or enhance the natural, built or historic environment, where enhancement measures will not be likely to have any negative effect on European Site
<b>DM R3:</b> Protecting corner/local shops	<b>A3</b>	This policy is intended to conserve or enhance the natural, built or historic environment, where enhancement measures will not be likely to have any negative effect on European Site
<b>DM R4:</b> Protection of shopping facilities within designated shopping frontages	<b>A3</b>	This policy is intended to conserve or enhance the natural, built or historic environment, where enhancement measures will not be likely to have any negative effect on European Site
<b>DM R5:</b> Food and drink/Leisure and entertainment	<b>A3</b>	This policy is intended to conserve or enhance the natural, built or historic environment, where enhancement measures will not be likely to have any negative effect on European Site
<b>DM R6:</b> Culture, arts and tourism development	<b>A3</b>	This policy is intended to conserve or enhance the natural, built or historic environment, where enhancement measures will not be likely to have any negative effect on European Site
<b>DM R7:</b> Markets	<b>A3</b>	This policy is intended to conserve or enhance the natural, built or historic environment, where enhancement measures will not be likely to have any negative effect on European Site

<b>DM H1:</b> Supported care housing for vulnerable people or secured residential institution for people housed as part of the criminal justice system	<b>A3</b>	This policy is intended to conserve or enhance the natural, built or historic environment, where enhancement measures will not be likely to have any negative effect on European Site
<b>DM H2:</b> Housing Mix	<b>A3</b>	This policy is intended to conserve or enhance the natural, built or historic environment, where enhancement measures will not be likely to have any negative effect on European Site
<b>DM H3:</b> Support for affordable housing	<b>A3</b>	This policy is intended to conserve or enhance the natural, built or historic environment, where enhancement measures will not be likely to have any negative effect on European Site
<b>DM H4:</b> Demolition and redevelopment of a single dwelling house	<b>A3</b>	This policy is intended to conserve or enhance the natural, built or historic environment, where enhancement measures will not be likely to have any negative effect on European Site
<b>DM H5:</b> Student housing, other housing with shared facilities and bedsits	<b>A5</b>	This policy would have no effect because no development could occur through the policy itself, the development could occur through the policies in the same plan, which are more specific and therefore more appropriate to assess for their effects on European Sites and associated sensitive areas.
<b>DM C1:</b> Community facilities	<b>A3</b>	This policy is intended to conserve or enhance the natural, built or historic environment, where enhancement measures will not be likely to have any negative effect on European Site
<b>DM C2:</b> education for children and young people	<b>A3</b>	This policy is intended to conserve or enhance the natural, built or historic environment, where enhancement measures will not be likely to have any negative effect on European Site
<b>DM E1:</b> Employment areas in Merton	<b>A3</b>	This policy is intended to conserve or enhance the natural, built or historic environment, where enhancement measures will not be likely to have any negative effect on European Site
<b>DM E2:</b> Offices in town and local centres	<b>A3</b>	This policy is intended to conserve or enhance the natural, built or historic environment, where enhancement measures will not be likely to have any negative effect on

		European Site
<b>DM E3:</b> Protection of scattered employment sites	<b>A3</b>	This policy is intended to conserve or enhance the natural, built or historic environment, where enhancement measures will not be likely to have any negative effect on European Site
<b>DM E4:</b> Local employment opportunities	<b>A5</b>	This policy would have no effect because no development could occur through the policy itself, the development being implemented through later policies in the same plan, which are more specific and therefore more appropriate to assess for their effects on European Sites and associated sensitive areas.
<b>DM O1:</b> Open space	<b>A2</b>	This policy is intended to protect the natural environment (including biodiversity) and historic environment.
<b>DM O2:</b> Trees, hedges and landscapes features	<b>A2</b>	This policy is intended to protect the natural environment (including biodiversity) and historic environment.
<b>DM D1:</b> Design consideration in all development	<b>A1</b>	This policy will not itself lead to development because it relates to design or other qualitative criteria for development and is not a land use planning policy.
<b>DM D2:</b> Alterations and extensions to existing buildings	<b>A1</b>	This policy will not itself lead to development because it relates to design or other qualitative criteria for development and is not a land use planning policy
<b>DM D3:</b> Managing heritage assets	<b>A2/A3</b>	This policy is intended to protect the natural environment, including biodiversity.  Furthermore, the policy is intended to conserve or enhance the natural, built or historic environment, where enhancement measures will not be likely to have any negative effect on European Site
<b>DM D4:</b> Urban design and the public realm	<b>A1</b>	This policy will not itself lead to development because it relates to design or other qualitative criteria for development and is not a land use planning policy
<b>DM D5:</b> Advertisements	<b>A2</b>	This policy is intended to protect the natural environment.
<b>DM D6:</b> Telecommunications	<b>A2</b>	This policy is intended to protect the natural environment.
<b>DM D7:</b> Shop front	<b>A1</b>	This policy will not itself lead to

design, alterations and advertising		development because it relates to design (qualitative criteria).
<b>DM EP1:</b> Opportunities for decentralised energy networks	<b>A1</b>	This policy will not itself lead to development because it relates to qualitative criteria (energy networks).
<b>DM EP2:</b> Reducing and mitigating against noise	<b>A1</b>	This policy will not itself lead to development because it relates to qualitative criteria (noise mitigation)
<b>DM EP3:</b> Allowable solutions	<b>A1</b>	This policy will not itself lead to development because it relates to qualitative criteria (energy efficiency)
<b>DM EP4:</b> Pollutants	<b>A1</b>	This policy will not itself lead to development because it relates to qualitative criteria (mitigation for pollutants).
<b>DM F1:</b> Support for flood risk management	<b>A3</b>	This policy is intended to conserve or enhance the natural, built or historic environment, where enhancement measures will not be likely to have any negative effect on European Site
<b>DM F2:</b> Sustainable drainage systems (SuDS) and; wastewater and water infrastructure	<b>A3</b>	This policy is intended to conserve or enhance the natural, built or historic environment, where enhancement measures will not be likely to have any negative effect on European Site
<b>DM T1:</b> Support of sustainable transport and active travel	<b>A1</b>	This policy will not itself lead to development because it relates to design and other qualitative criteria.
<b>DM T2:</b> Consideration of transport impact of development	<b>A3</b>	This policy is intended to conserve or enhance the natural, built or historic environment, where enhancement measures will not be likely to have any negative effect on European Site
<b>DM T3:</b> Applying relevant car parking and serving standards	<b>A3</b>	This policy is intended to conserve or enhance the natural, built or historic environment, where enhancement measures will not be likely to have any negative effect on European Sites.
<b>DM T4:</b> Transport infrastructure improvement	<b>A1</b>	This policy will not itself lead to development because it relates to design or other qualitative criteria for development and is not a land use planning policy
<b>DM T5:</b> Consideration and access to road network	<b>A1</b>	This policy will not itself lead to development because it relates to design and other qualitative criteria.

### **Screening Assessment of Site allocations**

- 6.10 In line with the screening requirements of the Habitats Regulations, an assessment was undertaken to determine the potential significant effects of potential site allocations on the integrity of the European Sites that lie within the potential influence of the plan.

**Table 6: Screening of site allocation sites**

Site Name and reference	Assessment category	Comment
Site1: Car park site of No. 66-84 Hartfield Road, Wimbledon SW19	A4	Policies that positively steer development away from European Sites and associated sensitive areas.
Site 2: 43-45 Palestine Grove, Colliers Wood SW19 2QN	A4	Policies that positively steer development away from European Sites and associated sensitive areas.
Site 5: Colliers Wood Community Centre SW19 2BY	A4	Policies that positively steer development away from European Sites and associated sensitive areas.
Site 8: Leyton Road Centre, 21 Leyton Road SW19 1DJ	A4	Policies that positively steer development away from European Sites and associated sensitive areas.
Site 9 Mitcham library, London Road, Mitcham CR4 2JB	A4	Policies that positively steer development away from European Sites and associated sensitive areas.

Taylor Road day centre, Wakefield House Taylor Road, Mitcham CR4 3JR	A4	Policies that positively steer development away from European Sites and associated sensitive areas.
West Barnes library, West Barnes Lane, 10 Station Road, New Malden KT3 6JJ	A4	Policies that positively steer development away from European Sites and associated sensitive areas.
<b>The Council is proposing to the Planning Inspectorate the removal of this site</b> Site 16: Wimbledon library/ Marlborough Hall 35 Wimbledon Hill Road, Wimbledon SW19 7NB	A4	Policies that positively steer development away from European Sites and associated sensitive areas.
Site 17: Worsfold House/Chapel Orchard Church Road Mitcham CR4C 3BE	A4	Policies that positively steer development away from European Sites and associated sensitive areas.
Site 18: 60 Pitcairn Road, Mitcham CR4 3LL	A4	Policies that positively steer development away from European Sites and associated sensitive areas.
Site 20: Wilson Hospital, Crammer Road, Mitcham CR4 4LD	A4	Policies that positively steer development away from European Sites and associated sensitive areas.

Site 21: 1-7 Birches Close, Mitcham CR4 4QL	A4	Policies that positively steer development away from European Sites and associated sensitive areas.
Site 22: Patrick Doody, Pelham Road SW19 1NX	A4	Policies that positively steer development away from European Sites and associated sensitive areas.
Site 23: 9 Amity Grove, Raynes Park SW20 0LQ	A4	Policies that positively steer development away from European Sites and associated sensitive areas.
Site 24: Morden Road clinic, 256 Morden Road, South Wimbledon SW19 3DA	A4	Policies that positively steer development away from European Sites and associated sensitive areas.
Site 28: 'P4' 11-127 The Broadway, Wimbledon London SW19 1QG	A4	Policies that positively steer development away from European Sites and associated sensitive areas.
Site 31: Wimbledon Community Centre, 28 St George Road, Wimbledon SDW19 4DP	A4	Policies that positively steer development away from European Sites and associated sensitive areas.

Site 32: Wyvern Youth Centre, 18 Arras Avenue, Morden SM4 6DF	A4	Policies that positively steer development away from European Sites and associated sensitive areas.
Site 33: Elm Nursery car park, Adjacent, No 125 London Road, Mitcham CR4 2JA	A4	Policies that positively steer development away from European Sites and associated sensitive areas.
Raleigh Gardens car park, 9-17 Western Road, Mitcham CR4 3ED	A4	Policies that positively steer development away from European Sites and associated sensitive areas.
Site 35: Mitcham fire station, 30 Lower Green West, Mitcham, CR4 3AF	A4	Policies that positively steer development away from European Sites and associated sensitive areas.
Site 36: Chaucer Centre, Canterbury Road, Morden SM4 6QB	A4	Policies that positively steer development away from European Sites and associated sensitive areas.
Site 37: Wimbledon Greyhound Stadium, Plough Lane Tooting SW17 0BL	A4	Policies that positively steer development away from European Sites and associated sensitive areas.
Site 41: Kingston Road opposite Lower Downs, 424- 448 Kingston Road, Raynes Park SW20 8DX	A4	Policies that positively steer development away from European Sites and associated sensitive areas.

Site 46: The Old Lamp works, High Path, Merton SW19 2LQ	A4	Policies that positively steer development away from European Sites and associated sensitive areas.
Site 48: Land at Bushey Road, Raynes Park, London SW120	A4	Policies that positively steer development away from European Sites and associated sensitive areas.
Site 53: Brook House, Mitcham Cricket Green CR4 4LA	A4	Policies that positively steer development away from European Sites and associated sensitive areas.
Site 587: Morden station offices and retail units, Morden 66a -82 London Road, Morden SM4 5BE	A4	Policies that positively steer development away from European Sites and associated sensitive areas.
Site 58: Sainsbury's (Peel House) car park Rear of 127 -149 Kenley Road Morden SM4 5BE	A4	Policies that positively steer development away from European Sites and associated sensitive areas.
Site 59 Corner Baltic House and High St Colliers Wood, 196 -196 High Street, Colliers Wood SW19 2BH	A4	Policies that positively steer development away from European Sites and associated sensitive areas.
Site 60: York Close car park, Morden M4 5HWS	A4	Policies that positively steer development away from European Sites and associated sensitive areas.

Site 61: Morden station car park- Station house, Kenley Road Merton Park SW19 3DP	A4	Policies that positively steer development away from European Sites and associated sensitive areas.
Site 62: Wimbledon YMCA, 196- 200 AND 220 The Broadway Wimbledon London SW19 1RY	A4	Policies that positively steer development away from European Sites and associated sensitive areas.
Site 63: Highland House, 165- 171 The Broadway, Wimbledon SW19 1NE	A4	Policies that positively steer development away from European Sites and associated sensitive areas.
Site 34: 12 Ravensbury Terrace, Wimbledon Park, SW18 4RL	A4	Policies that positively steer development away from European Sites and associated sensitive areas.
Site 65: Kenley Road car park, Morden	A4	Policies that positively steer development away from European Sites and associated sensitive areas.
Site 69: Sibthorp Road car park, Mitcham CR4 3NN	A4	Policies that positively steer development away from European Sites and associated sensitive areas.
Site 70: Haslemere industrial estate, 20 Ravensbury Terrace Wimbledon Park SW18 4RL	A4	Policies that positively steer development away from European Sites and associated sensitive areas.

Site 74: Southey Bowls Club, 559 Kingston Road Raynes Park SW20 8SF	A4	Policies that positively steer development away from European Sites and associated sensitive areas.
Site 75: Former Mitcham Gasworks, 49 Seagas House Western Road Mitcham CR4 3ED	A4	Policies that positively steer development away from European Sites and associated sensitive areas.
Site 77: Raynes Park Service Station, 26 Bushey Road, Raynes Park SW20 8LW	A4	Policies that positively steer development away from European Sites and associated sensitive areas.
Site 78: 191 - 193 Western Road, Colliers Wood CR4 3ED	A4	Policies that positively steer development away from European Sites and associated sensitive areas.
Site 80: Crusoe Road Industrial Buildings, 45a and 45b Crosoe Road, Mitcham CR4 3LI	A4	Policies that positively steer development away from European Sites and associated sensitive areas.

## **Screening Assessments conclusions**

- 6.11 Following the Screen Assessments it is clear that there is 'no direct land take' from any of European Sites either through the development policies, potential site allocations or proposed changes to the Policies Map.
- 6.12 The only potential impact that the Sites and Policies and Policies Map could have on the European Sites would be secondary in nature, by means of possible air pollution effects on habitat and species.
- 6.13 The Habitat Regulations Assessment Screening for the London Plan identifies air pollution as a 'threat', which is thought to be having an impact on the quality of the heathland habitat. Air pollution threats include nit.

## **7 Conclusion**

- 7.1 Housing Delivery has the potential adverse impact due to the increase in housing provision and the potential increase in visits to European Sites by residents within the borough and neighbouring boroughs.
- 7.2 As a result, the first stage of the screening assessment concluded that in isolation, the Sites and polices and Polices Map will not have any negative impacts upon the identified European Sites.
- 7.3 The second stage of the screening assessment concluded that '*in combination*' with other plans and programmes there would be no likely significant effects on a European Site. The screening assessment demonstrates that there is no further need to conduct more detailed studies into the impacts of the Sites and polices and Policies map on the two sites identified European Sites and an Appropriate Assessment would not be necessary.
- 7.4 These findings are in conformity with the Habitats Regulation Assessment carried out on the Stage 2 (January 2012), stage 2a (June 2012), stage 3 (January 2013) and stage 4 (July 2013).

**Appendix 1: Categorisation of the potential effect of the policies on the European Sites**

<b>Category A: No negative effect</b>	
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 or enhance the natural, built or historic environment, where enhancement measures will not be likely to have any negative effect on a European Sites.
A4	Policies that positively steer development away from European Sites and associated sensitive areas.
A5	Policies that would have no effect because no development could occur through the policy itself, the development being implemented through later policies in the same plan, which are more specific and therefore more appropriate to assess for their effects on European Sites and associated sensitive areas.
<b>Category B: No significant effect</b>	
B	Effects are trivial or 'de minimis', even if combined with other effects.
<b>Category C: Likely significant effect alone</b>	
C1	The option, policy or proposal could directly affect a European Sites 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

## **Appendix 2: Site of Special Scientific Interest (SSSI) glossary**

### **Action required**

This is a categorisation of the action that is required to bring the SSSI unit into favourable condition. There are three options: Natural England funding; Natural England negotiation/enforcement; and other party action. Any combination of these actions can be selected for one unit.

### **Adverse condition**

If a SSSI unit is currently assessed as being in unfavourable no change, unfavourable declining, part destroyed or destroyed condition, it is described as being in adverse condition and is not meeting the PSA target.

### **Citation**

The citation details the 'features of interest' for which a SSSI has been notified. Each citation shows details of the SSSI location, size and the date of notification. It also describes the general reasons for notification and the habitats, plants and animals that are found at the site.

### **Condition**

The condition of the SSSI land in England is assessed by Natural England, using categories agreed across England, Scotland, Wales, and Northern Ireland through the Joint Nature Conservation Committee. There are six reportable condition categories: favourable; unfavourable recovering; unfavourable no change; unfavourable declining; part destroyed and destroyed.

### **Condition assessment comments**

The condition assessment comments provide more detailed information about the condition assessment. Comments will not be present for every condition assessment.

### **Date compiled**

The date the information was extracted from the Natural England Site Information System (ENSIS).

### **Destroyed**

Lasting damage has occurred to all the special conservation interest of the SSSI unit such that it has been irretrievably lost. This land will never recover.

### **Natural England funding**

Natural England funding may be required for the unit to reach favourable condition e.g. a Wildlife Enhancement Scheme agreement is required.

### **Natural England negotiation/enforcement**

Negotiation and/or enforcement by Natural England are required for the unit to reach favourable condition.

### **Favourable**

Favourable condition means that the SSSI land is being adequately conserved and is meeting its 'conservation objectives'; however, there is scope for the enhancement of these sites.

### **Latest assessment date**

Latest condition assessment date carried out by Natural England.

**Main habitat**

The broadest classification of the feature on the unit selected from a list of habitats based on the BAP Broad Habitat classification.

**Meeting the PSA target**

If a SSSI unit is currently assessed as being in favourable or unfavourable recovering condition, it is described as 'meeting the PSA target'.

**Notification date**

The date the SSSI was notified to the Secretary of State for Environment, Food and Rural Affairs by Natural England. If the SSSI notification has been amended, this will be the date of the last revision.

**Operations requiring Natural England's consent (formerly known as operations likely to damage the special interest)**

Before any of these operations are undertaken the owner or occupier must consult Natural England and may require our consent.

It is usually possible to carry out many of these operations in certain ways or at specific times of year, or on certain parts of the SSSI, without damaging the features of interest. The Natural England Conservation Officer for the SSSI can provide advice and, where appropriate, issue consent.

In certain circumstances it will not be possible to consent to these operations, because they would damage the features of interest. Where possible the Conservation Officer will suggest alternatives which would enable consent to be issued. To proceed without Natural England's consent may constitute an offence. If consent is refused, or if conditions are attached to it which is unacceptable to the owner or occupier, they may appeal to the Secretary of State for Environment, Food and Rural Affairs.

**Other party action**

Action by a public or statutory body other than Natural England is required for the SSSI unit to reach favourable condition.

**Part destroyed**

Lasting damage has occurred to part of the special conservation interest of a SSSI unit such that it has been irretrievably lost and will never recover. Conservation work may be needed on the residual interest of the land.

**PSA target**

The Government's Public Service Agreement (PSA) target to have 95% of the SSSI area in favourable or recovering condition by 2010

**Reason for adverse condition**

The reason why the unit it is in adverse condition (i.e. unfavourable no change, unfavourable declining, part destroyed or destroyed). The reason is selected from a defined list.

**Source (reason for adverse condition)**

The cause of the adverse condition is within the SSSI (on site) or outside the SSSI (off site).

**SSSI unit**

SSSI units are divisions of SSSIs used to record management and condition details. Units are the smallest areas for which Natural England's gives a condition assessment. The size of units varies greatly depending on the types of management and the conservation interest. There are around 22,000 SSSI units.

#### **SSSI unit area**

The area of each SSSI unit in hectares calculated from digitised unit boundaries.

#### **Unfavourable declining**

This means that the special interest of the SSSI unit is not being conserved and will not reach favourable condition unless there are changes to site management or external pressures. The site condition is becoming progressively worse.

#### **Unfavourable no change**

This means the special interest of the SSSI unit is not being conserved and will not reach favourable condition unless there are changes to the site management or external pressures. The longer the SSSI unit remains in this poor condition, the more difficult it will be, in general, to achieve recovery.

#### **Unfavourable recovering**

Unfavourable recovering condition is often known simply as 'recovering'. SSSI units are not yet fully conserved but all the necessary management measures are in place. Provided that the recovery work is sustained, the SSSI will reach favourable condition in time.

In many cases, restoration takes time. Woodland that has been neglected for 50 years will take several years to bring back into a working coppice cycle. A drained peat bog might need 15-20 years to restore a reasonable coverage of sphagnum.

#### **Views about Management (VAM)**

The 'Views about Management' gives a straightforward account of the basic management that is needed to conserve and enhance the wildlife or geological features of the SSSI. By giving a clear and simple statement of management principles for conservation, these views will help to clarify and build upon the existing understanding between SSSI owners and occupiers and Natural England about the management of their SSSIs.

The views place no additional obligation on the owner or occupier of a SSSI nor do they replace any more detailed management advice which Natural England may have already given, such as advice in a Site Management Statement or a Management Agreement.

Under the Countryside and Rights of Way Act 2000, Natural England must notify the owners and occupiers of all SSSIs of its views about the management of the SSSIs. This programme must be completed by January 2006.