



Merton's draft Local Plan Habitat Regulation Assessment Report

July 2021

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Introduction

- I. The EC (European Commission) Habitats Directive 1992 and Wilds Birds Directive 2009 as transposed into UK (United Kingdom) law by the Conservation of Habitats and Species Regulations 2017 (as amended) require a Habitats Regulations Assessment (HRA) of land use plans to establish whether the plan, alone, or in combination with other plans or projects, is likely to have a significant effect on an international nature conservation site (Special Protection Areas (SPA), Special Areas of Conservation (SAC) or Ramsar sites). This is commonly known as the Habitat Regulation.
- II. The conservation of Habitats and Species (Amendment) (EU (European Union) Exit) Regulations 2019 were made on 14th March 2019. The Regulations ensure that the habitat and species protection and standards derived from EU law will continue to apply after Brexit. Amendments to the Habitats Regulations are largely limited to 'operability changes' that will ensure the regulations can continue to have the same working effect as now after the transition period. The purpose of an HRA is to assess the significance of potential impacts of a plan on relevant European sites. The assessment should determine whether the plan would adversely affect the integrity of the site in terms of its nature conservation objectives. Where negative effects are identified, other options should be examined to avoid any potential for damaging effects. HRA findings will feed into the parallel Sustainability Appraisal of the Local Plan which incorporates Strategic Environment Assessment (SEA), an integral part of the plan preparation process.
- III. This assessment is independent from the Sustainability Appraisal/Strategic Environmental Assessment although, its findings will be noted in the final report and will be sent with other environmental assessments to the inspector as part of the evidence base for the Examination in Public (EIP). This HRA Screening Report (Significance test) undertakes stage 1 as identified in figure 1 below.

European sites

- IV. 'European sites' are the cornerstone of UK nature conservation policy. Each forms part of a 'national network' of sites that are afforded the highest degree of protection in domestic policy and law. They comprise Special Protection Areas (SPA) classified under the 1979 Birds Directive and Special Areas of Conservation (SAC) designated under the 1992 Habitats Directive. As a matter of policy, potential SPAs (pSPAs), possible SACs (pSACs) and those providing formal compensation for losses to European sites, are also given the same protection¹.

¹ For the avoidance of doubt, the list of statutory European sites also comprises: A site submitted by the UK to the European Commission (EC) before Exit Day (a candidate SAC or cSAC) as eligible for selection as a Site of Community Importance (SCI) but not yet entered on the ECs list of SCI, until such time as the Appropriate Authority has designated the site or it has notified the statutory nature conservation body that it does not intend to designate the site. After Exit Day, no further cSACs will be submitted to the EU. Statutory European sites also include SCI included on a list of such sites by the European Commission from cSACs submitted by the UK before the UK left the EU, until such time as the UK designates the site when it will become a fully designated SAC.

- V. Together, the network comprises over 275 sites extending over 3,750,000ha² and safeguards the most valuable and threatened habitats and species across the country and Europe. Prior to Brexit, this formed part of the EU wide Natura 2000 network of SPAs and SACs to form the largest, coordinated network of protected areas in the world. The designations made under the European Directives still apply and the term, 'European site' remains in use. According to long-established Government policy, European sites also comprise 'Wetlands of International Importance' (or Ramsar sites) although these do not form part of the national network.
- VI. The overarching objective of the national network is to maintain, or where appropriate, restore habitats and species listed in Annexes I and II of the Habitats Directive to a Favourable Conservation Status, and contribute to ensuring, in their area of distribution, the survival and reproduction of wild birds and securing compliance with the overarching aims of the Wild Birds Directive. The appropriate authorities must have regard to the importance of protected sites, coherence of the national site network and threats of degradation or destruction (including deterioration and disturbance of protected features) on SPAs and SACs.

Habitat Regulation Assessment (HRA) legislation

- VII. The HRA refers to the assessment of the potential effects of a development plan on one or more European sites, including Special Protection Areas (SPAs) and Special Areas of Conservation (SACs):
- SACs are designated under the European Habitats Directive and target particular habitat types (Annex 1) and species (Annex II). The listed habitat types and species (excluding birds) are those considered to be most in need of conservation at a European level.
 - SPAs are classified in accordance with Article 4(1) of the European Union Birds Directive for rare and vulnerable birds (as listed in Annex I of the Directive), and under Article 4(2) for regularly occurring migratory species not listed in Annex I.
- VIII. The assessment must also consider potential SPAs, candidate SACs, Sites of Community Importance (SCIs) and Ramsar sites. Ramsar sites support internationally important wetland habitats and are listed under the Convention on Wetlands of International Importance especially as Waterfowl Habitat (Ramsar Convention, 1971).
- IX. The overall purpose of the HRA is to conclude whether or not a proposal or policy, or development plan, would adversely affect the integrity of the European site, either alone or in combination with other plans and projects. This is judged in terms of the implications of the plan for the 'qualifying features' for which the European site was designated:
- SACs – Annex I habitat types and Annex II species
 - SPAs – Annex I birds and regularly occurring migratory species not listed in Annex I
 - Ramsar sites – the reasons for listing the site under the Convention

² <https://jncc.gov.uk/our-work/special-protection-areas-overview/>

HRA stages and methodology

Figure 1: Habitats Regulation Assessment stages

Habitats Regulation Assessment		Outcome
<p>Stage 1: <i>Screening</i> <i>(Significance test)</i></p>	<ul style="list-style-type: none"> • Identification of European Sites both within Merton’s boundary, within 15 km of the boundary and/or within the potential influence of the plan. • Examine conservation objectives (if available) • Analyse the policy/plan and its key components • Identify potential effects on European Sites • Examine other plans and programmes that could contribute to ‘in combination’ effects • Information was obtained for each European Site, based on publicly available information and consultation with Natural England where appropriate. • This included information relating to the sites’ qualifying features; conservation objectives (where available) vulnerabilities/ sensitivities and geographical boundaries. • <i>If no effects likely report that no significant effect.</i> • <i>If effects are judged likely or uncertainty exists- the precautionary principle applies proceed to stage 2</i> 	<p>Where effects are unlikely, prepare a ‘finding of no significant effect report.’ Where effects judged likely, or lack of information to prove otherwise, proceed to Stage 2.</p>
<p>Stage 2: Appropriate Assessment (the ‘Integrity Test)</p>	<ul style="list-style-type: none"> • Collate information on sites and evaluate impact in light of conservation objectives • Consider how plan ‘in combination’ with other plans and programmes will interact when implemented (the Appropriate Assessment) • Consider how effect on integrity of site could 	<p>Appropriate Assessment report describing the plan, European site baseline conditions, the adverse effects of the plan on the European site, how these effects will be avoided through, firstly, avoidance, and secondly, mitigation</p>

	<p>be avoided by changes to plan and the consideration of alternatives</p> <ul style="list-style-type: none"> • Develop mitigation measures (including timescale and mechanisms) • <i>Report outcomes of AA and develop monitoring strategies</i> • <i>If effects remain following the consideration of alternatives and development of mitigations proceed to stage 3</i> 	<p>including the mechanisms and timescale for these mitigation measures. If effects remain after all alternatives and mitigation measures have been Considered proceed to Stage 3.</p>
<p>Stage 3: Assessment where no alternatives and adverse impacts remain</p>	<ul style="list-style-type: none"> • Identify 'imperative reasons of overriding public interest' (IROPI) • Identify/ develop potential compensatory measures • Difficult test to pass, requirements are onerous and untested to date. 	<p>This stage should be avoided if at all possible. The test of IROPI and the requirements for compensation are extremely onerous.</p>

X. In assessing the effects of Merton's pre-submission Local Plan in accordance with Regulation 102 of the Conservation of Habitats and Species Regulations 2012, there are potentially two tests to be applied by the competent authority: a '*Significance Test*', followed, if necessary, by an Appropriate Assessment which will inform the '*Integrity Test*'. The relevant sequence of questions is as follows:

- Step 1: Under Reg. 102(1) (b), consider whether the plan is directly connected with or necessary to the management of the sites (*this stage is undertaken at stage 1*), If not
- Step 2: Under Reg. 102(1) (a) consider whether the plan is likely to have a significant effect on the site,
 either alone or in combination with other plans or projects (the 'Significance Test'). (*This stage is undertaken at stage 1*) If yes,
- Step 3: Under Reg. 102(1), make an Appropriate Assessment of the implications for the site in view of its current conservation objectives (the 'Integrity Test'). In so doing, it is mandatory under Reg. 102(2) to consult Natural England, and optional under Reg. 102(3) to take the opinion of the public. (*This step is undertaken during Stage 2: Appropriate Assessment*).

- Step 4: In accordance with Reg.102(4), but subject to Reg.103, give effect to the land use plan only after having ascertained that the plan will not adversely affect the integrity of the European site.

XI. It is normally anticipated that an emphasis on Stages 1 and 2 of this process will, through a series of iterations, help ensure that potential adverse effects are identified and eliminated through the inclusion of mitigation measures designed to avoid, reduce or abate effects. The need to consider alternatives could imply more onerous changes to a plan document. It is understood that so called '*imperative reasons of overriding public interest*' (IROPI) are likely to be justified only very occasionally and would involve engagement with both the Government and European Commission. The HRA should be undertaken by the '*competent authority*' - in this case Merton Council.

Conclusion

XII. The Council concludes that, Merton's pre-submission Local Plan will not lead to adverse effects on the integrity of European sites either alone, or in combination with other plans and projects. None of the area visions or site allocations within Merton's pre-submission Local Plan is likely to have any significant adverse impact therefore, stage 2 (Appropriate Assessment) and stage 3 (mitigation and alternative solutions) of the HRA process are not considered necessary.

HRA Consultation

XIII. The Habitats Regulations requires plan making/competent authority to consult with Natural England (environmental statutory body). The Habitats Regulations gives responsibility for consultation with other bodies and the public to the discretion of the plan-making authority. Where possible the guidance recommends that this consultation be undertaken alongside the consultation for the Plan. A copy of this HRA Report will also be sent to Natural England, Environment Agency (EA) and Historic England (HE) for consideration, comments and advice.

Main report

1 Merton Local Plan

1.1 Merton Council is producing a new Local Plan for Merton, following several changes to the planning legislation and planning policy both at national and regional level. The new Local Plan must be in conformity with both the national and regional planning policy. The Vision is supported by 5 Strategic Objectives for, which are divided into the following categories:

- 1) Tackling Climate Change: make Merton an exemplary borough in mitigating and adapting to climate change.
- 2) Place plans and the 20-minute neighbourhood: to promote a high quality urban and suburban environment in Merton.
- 3) Supporting Resilience: supporting resilience and recovery, to create the conditions for sustainable growth and direct the benefits of growth.
- 4) Good Growth: to create the conditions for growth and minimise the impact of development.
- 5) Places for people: to provide new homes and infrastructure within Merton's town centres and residential areas.

1.2 Pre-submission policies are then set out in the remaining chapters of the Local Plan document, in the following sections:

- Good Growth
- Climate change
- Neighbourhoods
 - Colliers Wood
 - Mitcham
 - Morden
 - Raynes Park
 - South Wimbledon
 - Wimbledon
- Health and wellbeing
- Housing
- Design
- Economy
- Infrastructure
- Green and blue infrastructure
- Policies Map

Figure 2: Potential impacts of the Local Plan on European sites

Broad categories and examples of potential impacts on European

Activities responsible for impacts

sites	
<p>Physical loss</p> <ul style="list-style-type: none"> • Removal (including offsite effects, e.g. foraging habitat) • Mine collapse • Smothering • Habitat degradation 	<p>Development (e.g. housing, employment, infrastructure, tourism) Infilling (e.g. of mines, water bodies) Alterations or works to disused quarries Structural alterations to buildings (bat roosts) Tipping Inappropriate management for nature conservation</p>
<p>Physical damage</p> <ul style="list-style-type: none"> • Sedimentation / silting • Prevention of natural processes • Habitat degradation • Erosion • Trampling • Fragmentation • Severance / barrier effect • Edge effects • Fire 	<p>Flood defences Dredging Mineral extraction Recreation (e.g. motor cycling, cycling, walking, horse riding, water sports, caving) Development (e.g. infrastructure, tourism, adjacent housing etc.) Inappropriate management for nature conservation</p>
<p>Non-physical disturbance</p> <ul style="list-style-type: none"> • Noise • Vibration • Visual presence • Human presence • Light pollution 	<p>Development (e.g. housing, industrial) Recreation (e.g. dog walking, water sports) Industrial activity Navigation Vehicular traffic Artificial lighting (e.g. street lighting)</p>
<p>Water table/availability</p> <ul style="list-style-type: none"> • Drying • Flooding / storm water • Water level and stability • Water flow (e.g. reduction in velocity of surface water) • Barrier effect (on migratory species) 	<p>Drainage interception (e.g. reservoir, dam, infrastructure and other development) Increased discharge (e.g. drainage, runoff)</p>
<p>Contamination</p> <ul style="list-style-type: none"> • Water pollution • Soil contamination • Air pollution 	<p>Agrochemical (contraction of agricultural chemical) application and runoff Navigation Oil / chemical spills Tipping Landfill Vehicular traffic Industrial waste / emissions</p>
<p>Non-toxic contamination</p> <ul style="list-style-type: none"> • Nutrient enrichment (e.g. of soils and water) 	<p>Agricultural runoff Sewage discharge</p>

<ul style="list-style-type: none"> • Changes in salinity (amount of salt dissolved in a body of water) • Changes in thermal regime • Changes in turbidity (measure of relative clarity of a liquid) • Air pollution (including dust) 	Water abstraction Industrial activity Flood defences Construction
<p>Biological disturbance</p> <ul style="list-style-type: none"> • Direct mortality • Out-competition by non-native species • Selective extraction of species • Introduction of disease • Population growth • Natural succession 	Development (e.g. housing areas with domestic and public gardens) Predation: domestic pets Introduction of non-native species (e.g. from gardens) Fishing Hunting Agriculture Changes in management practices (e.g. grazing regimes, access controls, cutting/clearing)

2 Identification of European Sites and characterisation

- 2.1 The first step is 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 has assisted in the identification of the relevant sites.
- 2.2 There are two sites, which are immediately relevant for Merton. One is within borough boundary, Wimbledon Common and the other is Richmond Park (a Royal Park) which is 3-4 Km away in the borough of Richmond. It has been agreed with Natural England that 15km is a suitable catchment to identify Habitats Directive designated sites, as the effects of a plan can go beyond its boundary.
- 2.3 Beyond these two sites there are several sites outside London such as the Thames Basin Heaths, the Windsor Forest Great Park and the Mole Gap to Reigate Escarpment which are too far away to be considered relevant. In addition, a part of the South West London Water bodies is beyond the 15km catchment. Therefore, the potential impacts of the Plan will be screened on the conservation objectives of Wimbledon Common and Richmond Park. The description and the reason for their designation are set out below.

Wimbledon Common

- 2.4 Wimbledon Common is designated as a Special Area of Conservation (SAC), Site of Special Scientific Interest (SSSI) and Water Framework Directive (WFD). Appendix 1 Maps: identifies the SSSI and SAC. The common measures 351.38 ha and is found 1.5km to the north west of Wimbledon town centre and 1km of Richmond Park. The majority of the SAC is found within Merton and a smaller area within Putney Heath (London Borough of Wandsworth). The west of Wimbledon Common SAC also borders the Royal Borough of Kingston upon Thames.
- 2.5 Wimbledon Common supports the most extensive area of open, wet heath on acidic soil in Greater London. The site also holds a variety of other acidic heath and grassland communities reflecting the variations in geology, drainage and management. Associated with these habitats are several plants uncommon in the London area. The high plateau in the east and north of the site has a capping of glacial gravels overlying Claygate Beds and London Clay which are exposed on the western slope of the Common. The acidic soils and poor drainage of the plateau give rise to a mosaic of wet heath and unimproved acidic grassland. Semi-natural broadleaved woodland covers the deeper, clay soils of the western slope. The acidic grassland is mostly co-dominated by common bent *Agrostis capillaris* and sheep's fescue *Festuca ovina*; with soft rush *Juncus effusus* well represented where drainage is impeded.
- 2.6 Also present are two locally uncommon grasses, wavy hair grass *Deschampsia flexuosa* and in damper depressions, purple moor grass *Molinia caerulea*. Typical herb species of unimproved grassland occur including heath bedstraw *Galium saxatile*, tormentil *Potentilla erecta*, harebell *Campanula rotundifolia*, and eyebright *Euphrasia officinalis*. Purple moor grass also characterises the ground flora beneath encroaching pedunculate oak birch woodland on the gravels of the plateau. A significant cover of heather *Calluna vulgaris* distinguishes areas of both dry and wet heath.
- 2.7 The wet heath is especially important for its substantial extent and supports typical species such as the heath rush *Juncus squarrosus*. The brown sedge *Carex disticha* is present, as is mat-grass *Nardus stricta* on drier parts. Both species are restricted in their occurrence in Greater London. Localised areas of dry heath supporting bell heather *Erica cinerea* and dwarf gorse *Ulex minor* demonstrate the variability of the heathland habitat and are of additional note for an interesting lichen flora.
- 2.8 The semi natural woods of the clay soils comprise a dense canopy of maturing pedunculate oak *Quercus robur* and silver birch *Betula pendula*, with beech *Fagus sylvatica*, hornbeam *Carpinus betulus* and aspen *Populus tremula* in parts. Holly *Ilex aquifolium* is the dominant understorey species. Hazel *Corylus avellana* and alder buckthorn *Frangula alnus*, a species with a restricted distribution in London, also occur.
- 2.9 Where sufficient light penetrates there is an herb layer of bracken *Pteridium aquilinum* and bramble *Rubus fruticosus*. Several streams rise at the boundary of the gravels and clays and one feeds, a small valley mire known locally as Farm Bog. A rich assemblage of plants uncommon in Greater London occur here, such as bogbean *Menyanthes trifoliata*, bulbous rush *Juncus bulbosus*, water horsetail *Equisetum fluviatile* and several species of bog moss *Sphagnum*, including *S. palustre* and *S. fimbriatum*.

2.10 There are several ponds on the Common. The disused Bluegate gravel, workings with its variable water level supports an abundance of floating club rush *Eleogeton fluitans* in the shallow water; this is a locally uncommon species. Bog mosses, mainly *Sphagnum subsecundum* are also present, occurring amongst tussocks of rush *Juncus* species. The woodland and scrub support a locally important community of breeding birds, including green and great spotted woodpeckers, lesser whitethroat, nuthatch, and in most years, kestrel and lesser spotted woodpecker.

Figure 3: Wimbledon Common SSSI - Features from overlapping site

Feature	Overlapping site	Site Designation
H4010 Northern Atlantic wet heaths with <i>Erica tetralix</i>	Wimbledon Common SAC	SAC
H4030 European dry heaths	Wimbledon Common SAC	SAC
S1083 Stag beetle, <i>Lucanus cervus</i>	Wimbledon Common SAC	SAC
Lowland dry acid grassland (U1a)	Wimbledon Common SSSI	SSSI
Lowland dry acid grassland (U1b, No suggestions)	Wimbledon Common SSSI	SSSI
Lowland dry acid grassland (U4)	Wimbledon Common SSSI	SSSI
Lowland dry heath	Wimbledon Common SSSI	SSSI
Lowland wet heath	Wimbledon Common SSSI	SSSI

Source: Natural England

2.11 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.

2.12 Wimbledon Common has many 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 several other scarce invertebrate species associated with decaying timber.

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

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

Current pressures on Wimbledon Common

- Inappropriate behaviour by some visitors (e.g. collection and removal of dead wood)
- Habitat fragmentation
- Invasive species (specifically oak processionary moth *Thaumetopoea processionea*)
- Atmospheric pollution (nitrogen deposition)

Richmond Park

- 2.14 Richmond Park is designated as a National Nature Reserve, Site of Special Scientific Interest (SSSI) and Special Area of Conservation (SAC). The Park measures 856 ha and is located 1km from Wimbledon Common. Richmond Park is a Royal Park and is managed by the Department for Environment, Food and Rural Affairs (Defra). Richmond Park has been managed as a royal deer park since the seventeenth century, producing a range of habitats of value to wildlife. Richmond Park is of importance for its diverse deadwood beetle fauna associated with the ancient trees found throughout the parkland. In addition, the Park supports the most extensive area of dry acid grassland in Greater London.
- 2.15 London Clay underlies the Park with superficial deposits of Glacial and River Terrace Gravels forming higher ground, and Flood Plain Gravels and Alluvium covering part of the lower ground. This varied geology combined with long established grazing by deer has produced a mosaic of dry acid grassland, marshy and unimproved neutral grassland. These important communities grade into more improved grasslands and into areas dominated by bracken *Pteridium aquilinum*. Broadleaved woodlands, ponds and ditches add to the diversity of habitats present and ancient trees are present throughout. Acid grassland communities occur in extensive parts of the park and the presence of ant hills in these areas is considered indicative of a lack of disturbance over many years.
- 2.16 According to the Natural England, the dominant grasses are brown bent *Agrostis canina* var, Montana sheep's fescue *Festuca ovina* and wavy hairgrass *Deschampsia flexuosa*. Heath grass *Danthonia decumbens*, a species of dry grassy heaths, is also present, as is mat grass *Nardus stricta* which, although locally abundant within the park, is uncommon in London as a whole. Several typical herbs of this habitat occur including tormentil *Potentilla erecta* and heath bedstraw *Galium saxatile*. There is, in addition, a significant population of the upright chickweed *Moenchia erecta*, a nationally uncommon species.
- 2.17 Near to ponds and in damper areas, wet grassy heath species predominate such as purple moor grass *Molinia caerulea* and heath rush *Juncus squarrosus*. As waterlogging within the soil increases rushes *Juncus* spp become dominant often in conjunction with

tufted hair grass *Deschampsia cespitosa* and sedges *Carex* spp.

- 2.18 More interest is provided by the flora of the ditches and ponds where two species, scarce within Greater London, have been recorded, namely, alternate-flowered watermilfoil *Myriophyllum alterniflorum* within a manufactured pond and lesser skullcap *Scutellaria minor* in damp places near several ponds. The ancient parkland and its associated trees support a nationally significant assemblage of invertebrates. It is one of the prime sites in Britain for beetles associated with dead and decaying wood (lignicolous coleoptera) with over 200 species recorded. Many of these beetles are indicative of ancient forest areas where there has been a long continuous presence of over mature timber.
- 2.19 The decline in ancient wood and parkland habitats has led to the restriction of many of these lignicolous species to just a few localities in Britain. Two nationally restricted species occurring in Richmond Park are the click beetles *Ampedus cardinalis* and *Procræus tibialis*, listed as Red Data Book (RDB) Species. Both species live in rotting oak trunks and boughs, with Richmond Park the only British locality where *A. cardinalis* is clearly well established.
- 2.20 Other RDB listed beetles found in Richmond Park include *Lymexylon navale*, recorded from dead standing oaks, and *Uleiota planata* and *Tomoxia biguttata* more usually associated with beech. The larvae of *Agrilus sinuatus* live beneath the bark of old hawthorn trees and *Trinodes hirtus* is generally recorded from old oaks where it feeds on spiders' webs. In addition to the beetles, the yellow legged clearwing moth *Synanthedon vespiformis* which bores into oak stumps has been recorded from the park.
- 2.21 Richmond Park also supports nationally scarce species associated with dung and wetlands although these are generally not as threatened by habitat loss as the deadwood fauna. Approximately 135 beetle species have so far been recorded from wetland habitats and 75 species from dung, including the nationally restricted *Aphodius zenkeri*, rarely found outside deer parks due to its specific association with deer dung. None were specifically identified in the Natural England Site Improvement Plan, although loss of habitat (dead wood) would affect the stag beetle population.

Figure 4: Richmond Park SSSI - Features from overlapping sites

Feature	Overlapping site	Site Designation
S1083 Stag beetle, <i>Lucanus cervus</i>	Richmond Park SAC	SAC
Invert. assemblage A211 heartwood decay	Richmond Park SSSI	SSSI
Invert. assemblage A212 bark and sapwood decay	Richmond Park SSSI	SSSI
Invert. assemblage A213 fungal fruiting body	Richmond Park SSSI	SSSI
Lowland dry acid grassland (U1b, No suggestions)	Richmond Park SSSI	SSSI
Lowland dry acid grassland (U4/20)	Richmond Park SSSI	SSSI

Source: Natural England

- 2.22** 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 (emissions).
- 2.23** Stag Beetles are dependent on mature trees and deadwood therefore there is 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, dog walkers or other recreational users. Nevertheless, the management of the common and park, respectively by the Wimbledon Common and Putney Heath Conservators and the Royal Parks Authority by way of provisions under the Anti-Social Behaviour, Crime and Policing Act 2014 (changes to the Act replaces Dog Control Orders) and other byelaws are considered a way of minimising potential impact.

Figure 5: Wimbledon Common assessment

Main Habitat	Unit Number	Area (ha)	National Nature Reserve Overlap Area (ha)	Latest Assessment Date	Assessment Description	Comment	Adverse Condition Reasons
Dwarf Shrub Heath - Lowland	001	64.2291	0.00	18/07/2013	Unfavourable - Recovering	<p>This is an extensive area with a mosaic of heathland set amongst long-established secondary woodland. Most of the heath is best described as humid heath as it does not appear to be permanently wet.</p> <p>There are areas which are in good condition but most of the heath fails to meet key targets. There is no evidence of loss of habitat extent, indeed there has been recent tree and scrub clearance in parts of the unit to promote expansion of heath.</p> <p>Key concerns are low structural and age diversity in the heath vegetation, low cover of bare ground and gaps in the vegetation. The dominant heath species is heather with only very small amounts of cross-leaved heath. The heather is generally in the building/mature, mature growth phase with little in the pioneer stage, and conditions to promote establishment of new generations of heather are currently poor.</p> <p>Habitat structure for invertebrates of tall vegetation and scrub edge is good</p>	

Main Habitat	Unit Number	Area (ha)	National Nature Reserve Overlap Area (ha)	Latest Assessment Date	Assessment Description	Comment	Adverse Condition Reasons
						<p>but there are generally few gaps in the vegetation or areas of bare ground suitable for invertebrates of short turf and sandy soils. The frequency of characteristic associated plants is generally lower than desirable although tormentil, catsear, heath rush, common sedge, mat grass, heath grass and creeping willow are locally frequent. These are all scarce plants in London.</p> <p>Molinia is abundant but overall cover is within target (60%). Cover of bracken is generally low and is well within target overall. Cover of scrub is generally within target, but cover exceeds target in a few places (up to 40%). Cover of common gorse is within target.</p> <p>There are no indications of significant damaging impacts arising from non-native species, drainage, trampling, burning or disturbance.</p> <p>Measures to increase structural and age diversity in the heather, increase the amount of bare ground and gaps, and reduce scrub cover would bring the unit into favourable condition.</p>	

Main Habitat	Unit Number	Area (ha)	National Nature Reserve Overlap Area (ha)	Latest Assessment Date	Assessment Description	Comment	Adverse Condition Reasons
Acid Grassland - Lowland	002	129.3094	0.00	22/07/2013	Unfavourable - Recovering	<p>Includes an extensive area of species-rich acid grassland, areas of wet /dry heath, and acid grassland in the areas around the golf course, amongst long-established secondary woodland.</p> <p>Acid grassland is in good condition but most of the heath fails to meet key targets.</p> <p>No evidence of loss of habitat extent, indeed there has been recent tree and scrub clearance in parts of the unit to promote expansion and restoration of heath.</p> <p>Much of the heath has low structural and age diversity, and low cover of bare ground and gaps in the vegetation. Dominant heath species is heather with only very small amounts of cross-leaved heath.</p> <p>Heather is generally in the building/mature growth phase with little in the pioneer stage, and conditions to promote establishment of new generations of heather are currently poor.</p> <p>Habitat structure for invertebrates of tall vegetation, shady woodland and</p>	

Main Habitat	Unit Number	Area (ha)	National Nature Reserve Overlap Area (ha)	Latest Assessment Date	Assessment Description	Comment	Adverse Condition Reasons
						<p>scrub edge is good but there are generally few gaps in the vegetation or areas of bare ground suitable for invertebrates of short turf and sandy soils.</p> <p>Frequency of characteristic associated plants is generally lower than desirable but tormentil, catsear and heath rush are locally frequent.</p> <p>Molinia is abundant but overall cover is within target (60%). Cover of bracken is generally low and is well within target. Cover of scrub is generally within target but exceeds in a few places (up to 20%). Cover of common gorse within target.</p> <p>No indications of significant damaging impacts arising from non-native species, drainage, trampling, burning or disturbance.</p> <p>Measures to increase structural and age diversity in the heather, increase the amount of bare ground and gaps, and reduce scrub cover would bring the heath into favourable condition.</p> <p>Acid grassland meets targets for sward height, amount of leaf litter, cover of</p>	

Main Habitat	Unit Number	Area (ha)	National Nature Reserve Overlap Area (ha)	Latest Assessment Date	Assessment Description	Comment	Adverse Condition Reasons
						bracken, there is a wide range of associated plants including yellow rattle, oval sedge, mat grass, sheep's sorrel and tormentil.	
Broadleaved, Mixed and Yew Woodland - Lowland	006	44.8322	0.00	30/01/2014	Unfavourable - Recovering	<p>This unit contains a small area of acid grassland mainly on areas of rough on golf course.</p> <p>The grassland fails on high proportion of bare ground (25%) cover of litter (30%), cover of negative indicator species (10%), and just fails on the cover of trees and shrubs. Only one species recorded in sward as occasional. All other targets passed.</p> <p>The sward appears to be suffering from its use as a golf course-this could be through high footfall but also possibly through rolling and fertiliser spread- and management or use of the areas of acid grassland really needs to become less intensive to improve the condition.</p> <p>The Woodland area within this unit was assessed against the appropriate habitat conditions for the Stag Beetle.</p> <p>Generally, there was a good variation of tree age class across the woodland area but very few veteran or mature</p>	

Main Habitat	Unit Number	Area (ha)	National Nature Reserve Overlap Area (ha)	Latest Assessment Date	Assessment Description	Comment	Adverse Condition Reasons
						<p>trees. There was a good range of decaying wood, but some areas lacked large trunks or dead limbs (Mainly due to the lack of mature trees). The decaying wood was located in a variety of different conditions both warm and wet. Sycamore and Holly management is required; this should be addressed in the current EWGS. Where management/ removal takes place stumps should be treated in order to prevent Sycamore and Holly regeneration.</p> <p>In areas of heavy recreational use soil compaction is preventing regeneration.</p> <p>Woodland management should focus on Holly and Sycamore removal, identification and management of mature/veterans of the future and management of decaying wood habitat.</p>	
Broadleaved, Mixed and Yew Woodland - Lowland	008	95.395	0.00	30/01/2014	Unfavourable - Recovering	<p>The Woodland area within this unit was assessed against the appropriate habitat conditions for the Stag Beetle. The trees in this unit were varied in age class, although lacking in veteran and mature trees.</p> <p>Decaying wood was frequent throughout the unit, although the habitat would benefit from having</p>	

Main Habitat	Unit Number	Area (ha)	National Nature Reserve Overlap Area (ha)	Latest Assessment Date	Assessment Description	Comment	Adverse Condition Reasons
						<p>larger stumps either standing or fallen. The decaying wood was situated in a variety of conditions humid, dry and wet offering a variety of decaying habitats. In one area where a heavy thin had taken place, the saplings will need to be retained for succession and mature replacements in years to come.</p> <p>Some areas across the Unit were choked with Holly but this will be addressed through the EWGS.</p> <p>Rhododendron was also present in some area within the centre of the unit. A very short sward across all grassy areas in this unit of 2-5cm and very few species. Species seen included Dock, Rye Grass and Yarrow- possibly suffering from heavy rabbit grazing and management as part of the golf course. A very small area of heath managed under HLS as restoration in this Unit is looking successful, more restoration patches would be beneficial due to success of current plots</p>	
Dwarf Shrub Heath - Lowland	009	17.6173	0.00	12/09/2013	Unfavourable - No change	This unit contains areas of grassland at the edge of a golf course and areas of heathland in the rough and at the edges of the fairways. Signs of gorse control where visible when visited and the rough areas did not seem to be	Agriculture - inappropriate cutting/mowing.

Main Habitat	Unit Number	Area (ha)	National Nature Reserve Overlap Area (ha)	Latest Assessment Date	Assessment Description	Comment	Adverse Condition Reasons
						<p>suffering from significant over management/ high footfall. However, the unit fails on frequency of gramanoids and the proportion of dwarf shrubs in building/ mature and pioneer stage.</p> <p>The majority of the heather is at pioneer stage suggesting that it has been cut at the same time- however there is a small proportion of heather at the mature degenerate stage and little encroachment by scrub suggesting that more sympathetic management is taking place.</p>	

Source: Natural England compiled June 2021

Figure 6: Wimbledon Common condition summary

% 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%	5.01%	0.00%	0.00%

Source: Natural England, compiled June 2021



Figure 7: Richmond Park assessment

Main Habitat	Unit Number	Area (ha)	National Nature Reserve Overlap Area (ha)	Latest Assessment Date	Assessment Description	Comment
Acid Grassland - Lowland	001	114.5283	114.53	27/10/2010	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	002	3.0315	3.03	19/05/2010	Unfavourable - Recovering	<p>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.</p> <p>The assessment of the habitat as a whole follow: SRS assessment: Average of 4.3 surfaces across the site. Average of 4 surfaces for the unit.</p> <p>Preferred surfaces for the site as a whole: Scrub - Less than 10% across the site. However, there are several enclosures which have allowed the development of hawthorn and gorse scrub for example.</p> <p>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</p>

Main Habitat	Unit Number	Area (ha)	National Nature Reserve Overlap Area (ha)	Latest Assessment Date	Assessment Description	Comment
						<p>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.</p> <p>Dead Wood, number of veteran trees: A baseline of 1517 trees was established in a 2008 Royal Parks survey.</p> <p>Dead Wood, number of trees 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%</p> <p>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.</p> <p>Poor age structure of trees: This is being addressed through a tree planting program.</p> <p>The unit provides good levels of scrub, lying dead wood but has a closed canopy and is very shaded. Garden escapes and</p>

Main Habitat	Unit Number	Area (ha)	National Nature Reserve Overlap Area (ha)	Latest Assessment Date	Assessment Description	Comment
						rhododendron are a problem.
Acid Grassland - Lowland	004	153.6174	153.62	27/10/2010	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	005	205.2137	205.21	27/10/2010	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	006	29.3364	29.34	18/05/2010	Unfavourable - Recovering	<p>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 follow –</p> <p>SRS assessment: Average of 4.3 surfaces across the site. Average of 4 surfaces for the unit.</p> <p>Preferred surfaces for the site as a whole:</p> <p>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.</p>

Main Habitat	Unit Number	Area (ha)	National Nature Reserve Overlap Area (ha)	Latest Assessment Date	Assessment Description	Comment
						<p>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.</p> <p>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.</p> <p>Dead Wood, number of veteran trees: A baseline of 1517 trees was established in a 2008 Royal Parks survey.</p> <p>Dead Wood, number of trees with attached dead wood: Most veteran trees observed had a significant amount of attached deadwood greater than 20cm diameter.</p> <p>Dead organic matter: This was variable across the site, in much of the parkland, cover was 5-10%</p> <p>Negative factors: Rhodendron cover in many of the enclosed woodlands. This is being addressed through a program of clearance. High bracken coverage</p>

Main Habitat	Unit Number	Area (ha)	National Nature Reserve Overlap Area (ha)	Latest Assessment Date	Assessment Description	Comment
						<p>increases fire risk. Bracken is being controlled through herbicide spraying and periodic rolling.</p> <p>Poor age structure of trees: This is being addressed through a tree planting program.</p> <p>The unit provides nectar sources: bramble, rhododendron and has a high proportion of young oak and birch trees but few saplings</p>
Broadleaved, Mixed and Yew Woodland - Lowland	007	4.6562	4.66	19/05/2010	Unfavourable - Recovering	<p>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.</p> <p>The assessment of the habitat as a whole follow -</p> <p>SRS assessment: Average of 4.3 surfaces across the site. Average of 4 surfaces for the unit.</p> <p>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.</p> <p>Tree age structure: Across the site there</p>

Main Habitat	Unit Number	Area (ha)	National Nature Reserve Overlap Area (ha)	Latest Assessment Date	Assessment Description	Comment
						<p>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.</p> <p>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.</p> <p>Dead Wood, number of veteran trees: A baseline of 1517 trees was established in a 2008 Royal Parks survey.</p> <p>Dead Wood, number of trees with attached dead wood: Most veteran trees observed had a significant amount of attached deadwood greater than 20cm diameter.</p> <p>Dead organic matter: This was variable across the site, in much of the parkland, cover was 5-10%</p> <p>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</p>

Main Habitat	Unit Number	Area (ha)	National Nature Reserve Overlap Area (ha)	Latest Assessment Date	Assessment Description	Comment
						<p>periodic rolling.</p> <p>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</p>
Broadleaved, Mixed and Yew Woodland - Lowland	009	7.8647	7.86	19/05/2010	Unfavourable - Recovering	<p>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.</p> <p>The assessment of the habitat as a whole follow - SRS assessment: Average of 4.3 surfaces across the site. Average of 4 surfaces for the unit.</p> <p>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.</p> <p>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.</p> <p>Nectar sources: Less than 10% of the</p>

Main Habitat	Unit Number	Area (ha)	National Nature Reserve Overlap Area (ha)	Latest Assessment Date	Assessment Description	Comment
						<p>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.</p> <p>Dead Wood, number of veteran trees: A baseline of 1517 trees was established in a 2008 Royal Parks survey.</p> <p>Dead Wood, number of trees with attached dead wood: Most veteran trees observed had a significant amount of attached deadwood greater than 20cm diameter.</p> <p>Dead organic matter: This was variable across the site, in much of the parkland, cover was 5-10%</p> <p>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.</p> <p>Poor age structure of trees: This is being addressed through a tree planting program.</p> <p>The unit provides good levels of scrub,</p>

Main Habitat	Unit Number	Area (ha)	National Nature Reserve Overlap Area (ha)	Latest Assessment Date	Assessment Description	Comment
						young and middle-aged trees. Ground flora provides good nectar sources. Rhododendron is a problem in this unit.
Acid Grassland - Lowland	010	205.1277	205.13	27/10/2010	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	011	5.8234	5.82	19/05/2010	Unfavourable - Recovering	<p>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 follow –</p> <p>SRS assessment: Average of 4.3 surfaces across the site. Average of 4 surfaces for the unit.</p> <p>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.</p> <p>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</p>

Main Habitat	Unit Number	Area (ha)	National Nature Reserve Overlap Area (ha)	Latest Assessment Date	Assessment Description	Comment
						<p>program of tree planting.</p> <p>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.</p> <p>Dead Wood, number of veteran trees: A baseline of 1517 trees was established in a 2008 Royal Parks survey.</p> <p>Dead Wood, number of trees with attached dead wood: Most veteran trees observed had a significant amount of attached deadwood greater than 20cm diameter.</p> <p>Dead organic matter: This was variable across the site, in much of the parkland, cover was 5-10%</p> <p>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.</p> <p>Poor age structure of trees: This is being</p>

Main Habitat	Unit Number	Area (ha)	National Nature Reserve Overlap Area (ha)	Latest Assessment Date	Assessment Description	Comment
						<p>addressed through a tree planting program.</p> <p>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.</p>
BROADLEAVED, MIXED AND YEW WOODLAND - Lowland	012	22.5203	22.52	19/05/2010	Unfavourable - Recovering	<p>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 follow –</p> <p>SRS assessment: Average of 4.3 surfaces across the site. Average of 4 surfaces for the unit.</p> <p>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.</p> <p>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.</p>

Main Habitat	Unit Number	Area (ha)	National Nature Reserve Overlap Area (ha)	Latest Assessment Date	Assessment Description	Comment
						<p>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.</p> <p>Dead Wood, number of veteran trees: A baseline of 1517 trees was established in a 2008 Royal Parks survey.</p> <p>Dead Wood, number of trees with attached dead wood: Most veteran trees observed had a significant amount of attached deadwood greater than 20cm diameter.</p> <p>Dead organic matter: This was variable across the site, in much of the parkland, cover was 5-10%</p> <p>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.</p> <p>Poor age structure of trees: This is being addressed through a tree planting program.</p>

Main Habitat	Unit Number	Area (ha)	National Nature Reserve Overlap Area (ha)	Latest Assessment Date	Assessment Description	Comment
						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	013	57.2035	57.20	27/10/2010	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	014	18.7478	18.75	19/05/2010	Unfavourable - Recovering	<p>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 follow –</p> <p>SRS assessment: Average of 4.3 surfaces across the site. Average of 4 surfaces for the unit.</p> <p>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.</p> <p>Tree age structure: Across the site there are fewer saplings than veteran trees.</p>

Main Habitat	Unit Number	Area (ha)	National Nature Reserve Overlap Area (ha)	Latest Assessment Date	Assessment Description	Comment
						<p>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.</p> <p>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.</p> <p>Dead Wood, number of veteran trees: A baseline of 1517 trees was established in a 2008 Royal Parks survey.</p> <p>Dead Wood, number of trees with attached dead wood: Most veteran trees observed had a significant amount of attached deadwood greater than 20cm diameter.</p> <p>Dead organic matter: This was variable across the site, in much of the parkland, cover was 5-10%</p> <p>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</p>

Main Habitat	Unit Number	Area (ha)	National Nature Reserve Overlap Area (ha)	Latest Assessment Date	Assessment Description	Comment
						<p>periodic rolling.</p> <p>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.</p>
Broadleaved, Mixed and Yew Woodland - Lowland	015	18.7614	18.76	19/05/2010	Unfavourable - Recovering	<p>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 follow-</p> <p>SRS assessment: Average of 4.3 surfaces across the site. Average of 4 surfaces for the unit.</p> <p>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.</p> <p>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</p>

Main Habitat	Unit Number	Area (ha)	National Nature Reserve Overlap Area (ha)	Latest Assessment Date	Assessment Description	Comment
						<p>of saplings is being addressed through a program of tree planting.</p> <p>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.</p> <p>Dead Wood, number of veteran trees: A baseline of 1517 trees was established in a 2008 Royal Parks survey.</p> <p>Dead Wood, number of trees with attached dead wood: Most veteran trees observed had a significant amount of attached deadwood greater than 20cm diameter.</p> <p>Dead organic matter: This was variable across the site, in much of the parkland, cover was 5-10%.</p> <p>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.</p> <p>Poor age structure of trees: This is being</p>

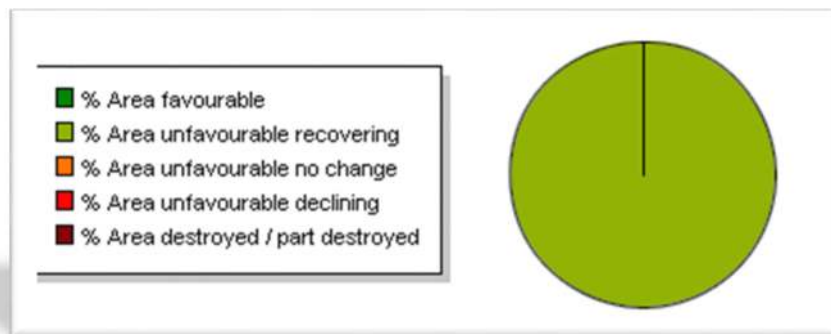
Main Habitat	Unit Number	Area (ha)	National Nature Reserve Overlap Area (ha)	Latest Assessment Date	Assessment Description	Comment
						addressed through a tree planting program. The unit provides good dead wood resource - a high proportion of trees have signs of decay/hollowing and the quantity of fallen timber is good. Many of the logs are in open and dappled conditions. Scrub resource is poor.

Source: Natural England complied June 2021

Figure 8: Richmond Park condition summary

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%

Source: Natural England, complied June 2021



Source: Natural England, complied June 2021

2.24 Figures 4 and 8 illustrates the known sensitivities / vulnerabilities of the European Sites. The following sections summarise the

effects which could be relevant to the proposals that occur within plan. It should be noted policies in the Plan that have already been assessed as part of Merton Local Plan HRA.

3 Interpretation of ‘Likely Significant Effect’

3.1 Relevant case law helps to interpret when effects should be considered as a Likely Significant Effect, when carrying out HRA of a land use plan.

3.2 It was the [Waddenzee case \(European Court of Justice C-127/02\)](#) ruled on the interpretation of Article 6(3) of the Habitats Directive (translated into Reg. 102 in the Habitats Regulations), including that:

An effect should be considered ‘*likely*,’ “*if it cannot be excluded, on the basis of objective information, that it will have a significant effect on the site*” (para 44).

An effect should be considered ‘*significant*,’ “*if it undermines the conservation objectives*” (para 48).

Where a plan or project has an effect on a site “*but is not likely to undermine its conservation objectives, it cannot be considered likely to have a significant effect on the site concerned*” (para 47).

3.3 An opinion delivered to the Court of Justice of the European Union commented that: “*The requirement that an effect in question be significant*” exists in order to lay down a de minimus threshold. Plans or projects that have no appreciable effect on the site are thereby excluded. If all plans or projects capable of having any effect whatsoever on the site were to be caught by Article 6(3), activities on or near the site would risk being impossible by reason of legislative overkill.”

3.4 The [Sweetman case \(European Court of Justice C-258/11\)](#) reinforced and further refined the Waddenzee case interpretation. The Advocate General’s Opinion stated: “*the question is simply whether the plan or project concerned is capable of having an effect. It is in that sense that the English ‘likely to’ should be understood.*”

4 Screening assumptions and information used in reaching conclusions about likely significant effects

4.1 During the screening stage of the HRA each draft policy was screened individually, which is consistent with current guidance. For some types of impacts, screening for Likely Significant Effects has been determined on a proximity basis, using GIS (Geographic Information System) data to determine the proximity of potential development locations to the European sites that are the subject of the assessment.

4.2 It should be noted that loss of habitat from outside of the boundaries of a European site could still affect the site if it occurs in an area used for offsite foraging or roosting by the qualifying species of the site (for example, land in an area used for foraging or roosting by SPA birds for example would be functionally connected to a European site). Therefore, consideration has been given to whether the European sites close to Merton have mobile species amongst their qualifying features that could be affected by habitat loss resulting from development on functional land outside of the European site boundary.

4.3 Potential effects on functionally connected land will only be relevant in relation to Lee Valley SPA / Ramsar as this site has bird species as its qualifying features. The stag beetle is a qualifying feature of Epping Forest SAC and may travel outside of the SAC boundaries; however, they will not travel far. Research suggests that 2km may be an appropriate buffer inside which sites could be functionally connected, as this is the distance that males travel to females during the breeding season. Epping Forest SAC is more than 2km outside the borough boundary and the 15km HRA catchment area.

Recreation and urbanisation

4.4 The nature of development proposed is also being considered, for example employment sites are considered less likely to result in increased recreation pressure than residential sites as employees will be at work within the development site for the majority of the time. Merton's Local Plan *policy H11.2 Housing provision* makes provision for a minimum of 11,732 additional homes from 2021/22-2035/36 which supports population growth across the plan area, but also accommodates household projections. Population increases in Merton as a whole and in certain neighbourhoods could increase recreational pressure on the European sites. This could give rise to a potential in combination effect with development in neighbouring boroughs. Section x examines the in-combination effects on the European sites. Recreation and urbanisation impacts is intricately linked to visitor/recreational pressures in that they both result from an increased population within close of sensitive sites. The list of urbanisation impact can be extensive, but core impacts can be singled out as followed:

Visitor and recreational pressure

4.5 The habitats and species of the European Sites are known to be sensitive to recreational pressure primarily dog walking. Although Merton's Local Plan could have an adverse impact to the sensitivity by increasing the number of people accessing the European Sites due to the potential increases in the local population, increase in housing development and possible increase in work and travel patterns due to increase development.

4.6 However, the management of the common and park respectively by the Wimbledon Common and Putney Heath Conservators, the Royal Parks Authority and the use of legal instruments such as bylaws and dog control orders are important tools which can assist in mitigate against such adverse impacts.

Increased fly tipping

- 4.7 Fly tipping is the illegal deposit of waste on land contrary to Section 33(1) (a) of the Environmental Protection Act 1990. The types of waste fly tipped range from 'black bag' waste to large deposits of materials such as industrial waste, tyres, construction material and liquid waste. Fly tipping is a significant blight on local environments; a source of pollution; a potential danger to public health and hazard to wildlife. It also undermines legitimate waste businesses where unscrupulous operators undercut those operating within the law.
- 4.8 However, the Council and the Environment Agency (EA) both have a responsibility in respect of illegally deposited waste. Local councils deal with most cases of fly tipping on public land, whilst the EA investigates and enforces against the larger, more serious and organised illegal waste crimes. Furthermore, the Council can issue Fixed Penalty Notice for certain offences such as littering and fly tipping. Therefore, no 'likely significant effects on fly tipping identified in relation to the European sites.

Cat predation

- 4.9 The most recent figures are from the Mammal Society they estimate that the UK's cats catch up to 275 million prey items a year, of which 55 million are birds. This is the number of prey items that were known to have been caught. We do not know how many more the cats caught, but did not bring home, or how many escaped but subsequently died. The most frequently caught birds, according to the Mammal Society are probably (in order) house sparrows, blue tits, blackbirds and starlings. However according to the RSPB despite the large numbers of birds killed, there is no scientific evidence that predation by cats in gardens is having any impact on bird populations UK-wide. This may be surprising, but many millions of birds die naturally every year, mainly through starvation, disease, or other forms of predation. There is however evidence that cats tend to take weak or sickly birds as prey.

Visitor and recreational pressure

- 4.10 The habitats and species of the European Sites are known to be sensitive to recreational pressure primarily dog walking. Although Merton's draft Local Plan could have an adverse impact to the sensitivity by increasing the number of people accessing the European Sites due to the potential increases in the local population, increase in housing development and possible increase in work and travel patterns due to increase development. However, the management of the common and park respectively by the Wimbledon Common and Putney Heath Conservators, the Royal Parks Authority and the use of legal instruments such as bylaws and dog control orders are important tools which can assist in mitigate against such adverse impacts.
- 4.11 Therefore, no 'likely significant' effects of recreation and urbanisation pressures identified in relation to the European sites as, there are mitigations measures such as, legislative that can be implemented by the Council and other statutory bodies.

Air pollution

- 4.12 Air quality is a complex area of science with many variables to be considered. Monitoring needs to be carried out over an extended period to show reliable and robust trends. It is affected by, temperature, weather, local conditions and wind direction. It is not necessarily accurate to compare one year's data with the next without considering all the variable factors. However, this does provide an 'indication' of local changes. 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 near the sites, or in-combination with air emissions from other sources (sourced from relevant Conservation Objectives). The management of Merton's air quality is through the Local Air Quality Management (LAQM) Plan which regularly reviews and assesses air quality in the borough and determines whether the air quality objectives are met.
- 4.13 The main pollutants of concern for European sites are oxide of nitrogen (NO_x (nitrogen oxides)) ammonia (NH₃) and sulphur dioxide (SO₂). NO_x can have a directly toxic effect upon vegetation. In addition, NO_x or ammonia concentration deposition within the atmosphere will lead to greater rates of nitrogen deposition into soil which, can have a serious harmful effect on the quality of semi natural habitats
- 4.14 Recent case law known as the Wealden judgement has revised the method of which Natural England expects to see in combination air pollution effects assesses. The implication of the judgement is that, where the road traffic effects of other plans or projects are known or can be reasonably estimated (including those of adopted plans or consents projects), then these should be included. According to the Department of Transport, the contribution of vehicle emissions from the roadside beyond 200 metres is not significant, in determining the environmental impact, in this case from the European site. The major roads within 200m of the European sites and still within 15km of Merton are as follows:
- A3 London Road as known as the Portsmouth Road including the Kingston-By-Pass
 - A291
 - A306 Roehampton Road
 - A308
- 4.15 Therefore, no 'likely significant' effects of air quality identified in relation to the European sites as, no site allocations lay directly within 200m of the European sites, the nearest site is Wi3: All England Lawn Tennis Club. This site is beyond the 200m and is not delivering any housing.

Non-physical disturbance (noise, vibration and light)

- 4.16 Noise and vibration effects during the construction of new housing or other development are most likely to disturb bird species and are thus a key consideration with respect to European sites where birds are the qualifying features, although such effects may also impact upon some mammals and fish species. Noise from construction will be managed through planning conditions and legislations such as planning and/or environmental.
- 4.17 Artificial lighting at night (for example streetlamps, flood lighting and security lights) is most likely to affect bat populations and some nocturnal bird species and therefore have an adverse effect on the integrity of European sites where bats or nocturnal birds are a qualifying feature. The effects of noise, vibration and light are most likely to be significant if, development takes place within 500m of a European site with qualifying features sensitive to these disturbances. The draft Local Plan policy *P15.10 Improving air quality and minimising pollution* expects new developments to be designed to minimise light pollution from internal and external lighting on wildlife, nature designations and blue infrastructure such as along the Wandle River. The Council will require the submission of light assessments to ensure the impacts are controlled and minimised.
- 4.18 Therefore, is no 'likely significant' effects of Non-physical disturbance (noise, vibration and light) identified in relation to the European sites.

Water quantity and quality

- 4.19 An increase in demand for water abstraction and treatment resulting from the growth proposed in the Merton Local Plan could result in changes in hydrology at European sites, specifically a decrease in water quality or changes to water levels. Depending on the qualifying features and, particular vulnerabilities of the European sites, there could be a Likely Significant Effect on site integrity. Water in Merton is supplied by Thames Water Utilities Ltd (TWUL). TWUL has a duty as a statutory water undertaker to provide clean and wastewater services and is responsible for the management, maintenance and operation of flood control structures under their ownership. Water Companies are defined as a Risk Management Authority within the FWMA and are responsible for flood risk management functions in accordance with the Water Resources Act 1991 and the Land Drainage Act 1991. TWUL is responsible for surface water drainage from development via adopted sewers and for maintaining trunk sewers into which many of the highway drainage in the study area connects.
- 4.20 Drainage and water pollution are issues which need to be addressed for any development proposal in Merton, and more so for large scale regeneration envisage in the Plan. Any development proposal will need to 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. Such development will be subject to Habitats Regulations Assessment if, it is in an area where a European Sites could be affected.

4.21 Therefore, there is no ‘likely significant’ effects of water quantity and quality identified in relation to the European sites.

5 Identification of other plans and projects which may have ‘in-combination’ effects.

5.1 Regulation 102 of the Amended Habitats Regulations 2010 requires an Appropriate Assessment where ‘a land use plan is likely to have a significant effect on a European site (either alone or in combination with other plans or projects) and is not directly connected with or necessary to the management of the site’. Therefore, where Likely Significant Effects have been identified, it is necessary to consider whether there may also be significant effects in combination with other plans or projects. The aim is to identify ‘in-combination’ effects, which, other plans and projects in addition to the Merton’s Local Plan may affect the European sites. There are a large number of potentially relevant plans and projects which could be considered; therefore, the review focused on planned spatial growth within the authorities neighbouring Merton as these are the ones most likely to give rise to in combination effects.

5.2 The Council does not consider that there are any major development projects in the planning system within the borough that are not already identified within the Local Plan. Therefore, it is not considered that there will be any in-combination effects from other projects. Figure 9 lists the relevant plans that were considered, outlining the components of each that could have an impact on nearby European sites and considering the findings of the accompanying HRA work (where available)

Figure 9: In combination effects

Local authority	Housing	Transport	The local authority HRA findings.	This HRA comment(s)
Croydon Local Plan 2018 and Local Plan review (due to be adopted in 2022).	Seeking to deliver a minimum of 32,890 homes between 2016 and 2036.	None identified	<i>The assessment concluded that CLP1.1 contained sufficient in-built mitigation, combined with low increase in recreational pressure upon the SAC resultingpolicies were screened out from having likely significant effects upon any European designated sites</i>	Development identified in Croydon’s Council’s Local Plan are unlikely to have any likely significant adverse effects on the European sites.
Wandsworth Local Plan regulation 18 November 2020	To ensure the supply of new homes in Wandsworth, the Local Plan will provide for the delivery of a minimum of 1,950	None identified	<i>In summary, this screening assessment has not identified any significant adverse effects</i>	Development identified in Wandsworth Council’s Local Plan are unlikely to have any likely significant adverse effects on the

Local authority	Housing	Transport	The local authority HRA findings.	This HRA comment(s)
	new homes per year by 2028/2029. This target will be rolled forward until it is replaced by a revised London Plan target.		<i>on any Natura 2000 site: particularly Wimbledon Common SAC or Richmond Park SAC. Similarly, the DWLP will not have an adverse impact on the integrity of these. Consequently, the Appropriate Assessment stage is not required on the DWLP.</i>	European sites.
Sutton Local Plan 2016 -2031	The Council will enable the delivery of new homes to help meet London's housing needs and local housing needs by aiming to deliver at least 6,405 new home over the plan period (2016-2031 – 427 homes per year), subject to any subsequent borough target approved by the Mayor of London over the plan period	None identified.	<i>The Council conclusion that none of the emerging policies options or site allocation was likely to have a significant effect. This was endorsed by Natural England.</i>	Development identified in Sutton's Council's Local Plan are unlikely to have any likely significant adverse effects on the European sites.
Lambeth	The Council seeks to maximise the supply of additional homes in the borough to meet and exceed Lambeth's housing requirement of 13,350 homes for the ten-year period 2019/20 to 2028/29	None identified	<i>Screening assessment on the DRLLP has not identified any likely significant adverse effects on any European Site (October 2018)</i>	Development identified in Lambeth Local Plan are unlikely to have any likely significant adverse effects on the European sites.
Kingston Core Strategy (2010) Kingston Council are currently producing a new Local Plan for the borough at time of writing this HRA – no HRA screening had been carried out by Kingston Council.	The Council will seek to meet and exceed the borough's annual housing target as set out in the London Plan (5,625 dwellings) for the period 2012/13 to 2026/27. The current target is to achieve 375 new units a year.	None identified	<i>The HRA report for the Core Strategy (December 2010) set out the findings of the screening stage of the HRA. It was concluded that the Core Strategy DPD (development plan documents) would not have any significant effects on European sites either alone or in combination with other plans and programmes. As a result,</i>	Development identified in Kingston Local Plan are unlikely to have any likely significant adverse effects on the European sites.

Local authority	Housing	Transport	The local authority HRA findings.	This HRA comment(s)
			<i>Appropriate Assessment was not required.</i>	
Richmond Local Plan 2018.	<p>The Borough's target is 3,150 homes for the period 2015-2025. This target will be rolled forward until it is replaced by a revised London Plan target. The Council will exceed the minimum strategic dwelling requirement, where this can be achieved in accordance with other Local Plan policies.</p> <p>The following amounts of housing are indicative ranges in these broad areas of the borough to 2025, sub areas (approx. numbers): Richmond 1000-1050 Twickenham 1000-1050 Teddington and the Hamptons - 650-700 East Sheen - 400-500 Whitton - 100</p>	None identified	<i>The findings of the screening stage have been explained in detail in Chapter 4 of this report. The majority of the potential impacts associated with development were able to be screened out at this stage, with the exception of air pollution. Policies within the Local Plan which will result in new development will contribute to an increase in traffic and therefore air pollution, either alone or in combination with development in neighbouring boroughs. However, an Appropriate Assessment has been carried out and has concluded that the LBRuT Publication Local Plan is not expected to result in adverse effects on the integrity of any European sites in relation to increased air pollution from vehicle traffic.</i>	Development identified in Richmond's Local Plan are unlikely to have any likely significant adverse effects on the European sites.

5.3 Following the reviewing of neighbouring boroughs plans, it is concluded that there are no 'likely significant' effects identified in relation to the European sites in combination with Merton's draft Local Plan.

6 Screening

6.1 As required under Regulation 102 of the Conservation of Habitats and Species Regulations - an assessment of the 'likely significant

effects’ of Merton’s Local Plan will be undertaken. A ‘traffic light’ approach will be used to record the likely impacts of the policies and site allocations on European sites and their qualifying habitats and species, using the colour categories shown below and the categorisation of the potential effect of the policies on the European Sites matrix found in figure 11.

Figure 10: Traffic light HRA Screening

Red	There are likely to be significant effects (Appropriate Assessment required).
Amber	There may be significant effects, but this is currently uncertain (Appropriate Assessment required).
Green	There are unlikely to be significant effects (Appropriate Assessment not required).

6.2 For this HRA a risk-based approach involving the application of the precautionary principle will be adopted in the assessment, such that a conclusion of ‘no significant effect’ will only be reached where it is considered very unlikely, based on current knowledge and the information available, that a policy or site allocation would have a significant effect on the integrity of a European site. The following section looks at the draft Local Plan policies and assess the ‘likely significant effect’ on the European sites.

Figure 11: Categorisation of the potential effect of the policies on the European Sites

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 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.
Category B: No significant effect	
B	Effects are trivial or ‘de minimis,’ even if combined with other effects.
Category C: Likely significant effect alone	
C1	The option, policy or proposal could directly affect a European 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

7 Local Plan screening stage pre-submission

Figure 12: Local Plan policies - HRA screening (since stage 2a policy name have changed)

Policy Title	Effects if policy is implemented	European site(s) potentially affected	Categorisation of the potential effect of the policies on the European Sites	Comment
Strategic Policy CC2.1 Promoting sustainable design to mitigate and adapt to climate change			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.
Policy CC2.2 Minimising greenhouse gas emissions).				
Policy CC2.3 Minimising energy use				
Policy CC2.4 Low carbon energy				
Policy CC2.5 Minimising waster and promoting Circular Economy				
Policy CC.2.6 Sustainable design standards				
Policy N3.1 Colliers Wood/ Surrounding area of Colliers Wood.			A4	Policies that positively steer development away from European Sites and associated sensitive areas.
Policy N4.1 Mitcham Town Centre/ Surrounding area of Mitcham Town Centre				
Policy N5.1 Morden/ Morden Regeneration Zone/ The Wider Morden Town Centre Area				
Policy N6.1 Raynes Park Local Centre/ Surrounding area of Raynes Park Local Centre				
Policy N.7.1 South Wimbledon				

Policy Title	Effects if policy is implemented	European site(s) potentially affected	Categorisation of the potential effect of the policies on the European Sites	Comment
Policy N.9 Wimbledon Town Centre/ Surrounding neighbourhoods of Wimbledon				
Strategic Policy H10.1 Health (including mental health) and wellbeing			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.
Policy H10.2 Delivering healthy places				
<i>Housing policies:</i>				
Strategic Policy H11.1 Housing Choice			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.
Strategic Policy H11.2 Housing Provision				
Policy H11.3 Housing Mix				
Policy H11.4 Supported care housing for vulnerable people or secure residential institutions for people housed as part of the criminal justice system				
Policy H11.5 Student housing, other housing with shared facilities and bedsits				
Policy H11.6 Accommodation of Gypsies and Travellers				
Policy H11.7 Build to rent.				
Strategic Policy D12.1 Delivering well designed				Policies that will not

Policy Title	Effects if policy is implemented	European site(s) potentially affected	Categorisation of the potential effect of the policies on the European Sites	Comment
<p>and resilient neighbourhoods</p> <p>Policy D12.2 Urban design</p> <p>Policy D12.3 Ensuring high quality design for all developments</p> <p>Policy D12.4 Alterations and extensions to existing buildings</p> <p>Policy D12.5 Managing heritage assets</p> <p>Policy D12.6 Tall Buildings</p> <p>Policy D12.7 Advertisements</p> <p>Policy D12.8 Digital infrastructure</p> <p>Policy D12.9 Shop front design and signage</p> <p>Policy D12.10 Dwelling Conversions</p> <p>Policy D12.12 Basements and subterranean design.</p>			A1	<p>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.</p>
<p>Policy EC13.1 Promoting economic growth and successful high streets</p>			A4	<p>Policies that positively steer development away from European Sites and associated areas.</p>
<p>Policy EC13.2 Business locations in Merton</p>				
<p>Policy EC13.3 Protection of scattered employment sites</p>				
<p>Policy EC13.4 Local Employment Opportunities</p>				
<p>Policy TC7.13.5 Merton's town centres and</p>				

Policy Title	Effects if policy is implemented	European site(s) potentially affected	Categorisation of the potential effect of the policies on the European Sites	Comment
neighbourhood parades				
Policy TC7.13.6 Development of town centre type uses outside town centres				
Policy TC7.13.7 Protecting corner / local shops				
Policy Tc7.8 Food and drink / leisure and entertainment				
Policy Tc7.9 Culture, arts and tourism				
Strategic Policy In14.1 Infrastructure (<i>former name Social and community Infrastructure</i>).			A4	Policies that positively steer development away from European Sites and associated areas.
Policy In14.2.2 Social and community infrastructure				
Policy In14.3 Sport and Recreation				
Strategic Policy In14.4 Waste Management				

Policy Title	Effects if policy is implemented	European site(s) potentially affected	Categorisation of the potential effect of the policies on the European Sites	Comment
Strategic Policy O15.1 Open Space, Green Infrastructure and Nature Conservation Policy O15.2 Open Space and Green Infrastructure Policy O15.3 Biodiversity and nature conservation Policy O15.4 Protection of Trees Policy O15.5 Urban Greening Policy O15.6 Valley Regional Park			A2/A3	Policies intended to protect the natural environment, including biodiversity. 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.
Strategic Policy F15.7 Managing flood risk from all sources of flooding Policy F15.8 How to manage flood risk Policy F15.9 Sustainable drainage systems (SUDS)			A2/A3	Policies intended to protect the natural environment, including biodiversity. 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.
Policy F15.10 Improving air quality and minimising pollution Air Quality/ Noise and vibration/ Light pollution/ Odours and fume control/ Land contamination/ Managing pollution from construction and demolition				
Strategic Policy T16.1 Sustainable transport Policy T16.2 Prioritising active travel choices Policy T16.3 Managing transport impacts Policy T16.4 Parking and low emissions Policy T16.5 Supporting Transport Infrastructure.			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

Policy Title	Effects if policy is implemented	European site(s) potentially affected	Categorisation of the potential effect of the policies on the European Sites	Comment
				a land use planning policy.

Figure 13: Site allocations HRA screening

Site allocation	Effect of policy is implemented	European sites(s) potentially affected	Categorisation of the potential effect of policies on European Sites	Comment
<i>Colliers Wood neighbourhood</i>				
CW1: Baltic Close			A4	
CW2: Car Park South of Britannia Point			A4	
CW3: Colliers Wood Community Centre			A4	
CW4: Colliers Wood Station			A4	
CW5: Priory Retail Park			A4	
<i>Mitcham Neighbourhood:</i>				
Mi1: Benedict Wharf			A4	
Mi2: Birches Close			A4	Policies that positively steer development away from European Sites and associated areas.
Mi3: Burn Bullock and Mitcham Cricket Pavilion			A4	Policies that positively steer development away from European Sites and associated areas.
Mi4: Elm Nursery Car Park			A4	Policies that positively steer development away from European Sites and associated areas.
Mi5: Land at Canons			A4	Policies that positively steer development away from European Sites and associated areas.
Mi6: 326 and 328 London Road			A4	Policies that positively steer development away from European Sites and associated areas.
Mi7: 370 London Road			A4	Policies that positively steer development away from European Sites and associated areas.
Mi8: 1 to 12 Majestic Way			A4	Policies that positively steer development away from European Sites and associated areas.

Site allocation	Effect of policy is implemented	European sites(s) potentially affected	Categorisation o the potential effect of policies on European Sites	Comment
Mi9: Former Mitcham Fire Station			A4	Policies that positively steer development away from European Sites and associated areas.
Mi10: Mitcham Library			A4	Policies that positively steer development away from European Sites and associated areas.
Mi6: 326 and 328 London Road			A4	Policies that positively steer development away from European Sites and associated areas.
Mi7: 370 London Road			A4	Policies that positively steer development away from European Sites and associated areas.
Mi8: 1 to 12 Majestic Way			A4	Policies that positively steer development away from European Sites and associated areas.
Mi9: Former Mitcham Fire Station			A4	Policies that positively steer development away from European Sites and associated areas.
Mi10: Mitcham Library			A4	Policies that positively steer development away from European Sites and associated areas.
Mi11: Raleigh Gardens car park			A4	Policies that positively steer development away from European Sites and associated areas.
Mi12: Sibthorpe Road Car Park			A4	Policies that positively steer development away from European Sites and associated areas.
Mi13: 30 St Mark's Road			A4	Policies that positively steer development away from European Sites and associated areas.
Mi14: United Westminster Schools site			A4	Policies that positively steer development away from European Sites and associated areas.
Mi15 Taylor Road Day Centre			A4	Policies that positively steer development away from European Sites and associated areas.
Mi16: Mitcham Gasworks Western Road			A4	Policies that positively steer development away from European Sites and associated areas.
Mi17: White Hart Pub and back land London Road			A4	Policies that positively steer development away from European Sites and associated areas.
Mi18: Wilson Hospital			A4	Policies that positively steer development away from European Sites and associated areas.
Mi19 Worsfold House Church Road			A4	Policies that positively steer development away from European Sites and associated areas.

Site allocation	Effect of policy is implemented	European sites(s) potentially affected	Categorisation o the potential effect of policies on European Sites	Comment
Mi16: Mitcham Gasworks Western Road			A4	Policies that positively steer development away from European Sites and associated areas.
Mi17: White Hart Pub and back land London Road			A4	Policies that positively steer development away from European Sites and associated areas.
Mi18: Wilson Hospital			A4	Policies that positively steer development away from European Sites and associated areas.
Mi19 Worsfold House Church Road			A4	Policies that positively steer development away from European Sites and associated areas.
<i>Morden neighbourhood</i>				
MO1: Chaucer Centre			A4	Policies that positively steer development away from European Sites and associated areas.
Mo2: Farm Road Church			A4	Policies that positively steer development away from European Sites and associated areas.
Mo3: Imperial Sports Ground Tooting and Mitcham Hub			A4	Policies that positively steer development away from European Sites and associated areas.
Mo4: Morden Regeneration Zone			A4	Policies that positively steer development away from European Sites and associated areas.
Mo5: Morden Road Clinic and Morden Hall Medical Centre			A4	Policies that positively steer development away from European Sites and associated areas.
Mo6: York Close Car			A4	Policies that positively steer development away from European Sites and associated areas.
Mo7: Gifford House			A4	Policies that positively steer development away from European Sites and associated areas.
<i>Raynes Park neighbourhood</i>				
RP1: Amity Grove Clinic.			A4	Policies that positively steer development away from European Sites and associated areas.
RP2: 245 -247 Burlington Road.			A4	Policies that positively steer development away from European Sites and associated areas.
RP3: Tesco, Burlington Road.			A4	Policies that positively steer development away from European Sites and associated areas.
RP4: 80-86 Bushey Road.			A4	Policies that positively steer development away from European Sites and associated areas.

Site allocation	Effect of policy is implemented	European sites(s) potentially affected	Categorisation o the potential effect of policies on European Sites	Comment
RP5: All England Lawn Tennis Club Community Sports Ground 216 Grand Drive,			A4	Policies that positively steer development away from European Sites and associated areas.
RP6: Land at the former LESSA Sports Ground Grand Drive			A4	Policies that positively steer development away from European Sites and associated areas.
RP7: Rainbow Industrial Estate Grand Drive			A4	Policies that positively steer development away from European Sites and associated areas.
RP8: West Barnes Library			A4	Policies that positively steer development away from European Sites and associated areas.
<i>Wimbledon neighbourhood</i>				
W1 Battle Close, North Road			A4	Policies that positively steer development away from European Sites and associated areas.
Wi2: Broadway Car Park,			A4	Policies that positively steer development away from European Sites and associated areas.
Wi3: All England Lawn Tennis Club			A4	Policies that positively steer development away from European Sites and associated areas. However, due to its proximity to the European Site (Wimbledon Common) and possible increase of travel in the area. It is recommended that the landowners/developer seek advice and engage with Natural England on all aspects of proposal(s).
Wi5: Hartfield Road Car Park			A4	Policies that positively steer development away from European Sites and associated areas.
Wi6; Highlands House, 165-171 The Broadway			A4	Policies that positively steer development away from European Sites and associated areas.
Wi7: Rufus Business Centre			A4	Policies that positively steer development away from European Sites and associated areas.
Wi8: South Wimbledon Station			A4	Policies that positively steer development away from European Sites and associated areas.
Wi9: 28 St George's Road			A4	Policies that positively steer development away from European Sites and associated areas.

Site allocation	Effect of policy is implemented	European sites(s) potentially affected	Categorisation o the potential effect of policies on European Sites	Comment
Wi10: Prospect House, 30 St George's Road			A4	Policies that positively steer development away from European Sites and associated areas.
Wi11: Victoria Crescent, 39-59 The Broadway			A4	Policies that positively steer development away from European Sites and associated areas.
Wi12: Wimbledon Stadium and Volante Site			A4	Policies that positively steer development away from European Sites and associated areas.
Wi13: 8-20 Worples Road and 20-26 St George's Road			A4	Policies that positively steer development away from European Sites and associated areas.
Wi15: YMCA Wimbledon			A4	Policies that positively steer development away from European Sites and associated areas.
Wi16: Centre Court Shopping Centre			A4	Policies that positively steer development away from European Sites and associated areas.

Policies Map

7.1 The draft Policy Map proposes a number of boundary changes to some open space and industrial areas designations. All the proposed change does not result in any loss of European Sites. The reasons for the boundary changes are as follows:

Open space

- Open space boundary amendment
 - Identified in the borough-wide open space review as no longer meeting open space criteria.
 - Open space is proposed as a Site Allocation for accessible sporting facility
- SINC (Sites of Importance to Nature Conservation) boundary amendment –
 - Identified in the borough-wide review as no longer meeting green corridor criteria.
 - To fix minor mapping error

- Minor MOL (Metropolitan Open Land) boundary amendment –
 - Identified in the borough-wide open space review as no longer meeting MOL criteria
 - Boundary changes are required to correct an anomaly from the current Development Plan. Land is privately owned and has long been used as a private garden.

Industrial sites

7.2 Benedict Wharf Hallowfield Way, Mitcham, CR4 3BT to remove the northern part of the site from Strategic Industrial Location and South London Waste Plan schedule 1:

- Reasons: This site is identified as Mi11 in Mitcham Site Allocations. Removal from SIL (Strategic Industrial Location) proposed due to nearby sensitive receptors, unviability of continued heavy industry and waste management on site. Waste management capacity to be retained elsewhere in South London Waste Plan boroughs. For more details, please see Site Allocation Mi1

Figure 13: Site allocations HRA screening

Draft Local Plan	Effect of policy is implemented	European sites(s) potentially affected	Categorisation o the potential effect of policies on European Sites	Comment
Draft Local Plan Policies Map designations			A4	Policies that positively steer development away from European Sites and associated sensitive areas

8 Local Plan screening at other stages

8.1 The screening of the draft Local Plan (stage 2a) has found there is ‘no significant effect therefore an Appropriate Assessment (stage 2 of HRA) process is not needed.

8.2 In 2018, the Council produced a HRA screening it found that the Local Plan (stage 2) did not have a significant effect on the European sites. As part of the HRA process the Council consulted with Natural England who said, ‘*Natural England does not consider that this SEA/SA scoping report and Habitat Regulation Assessment poses any likely risk or opportunity in relation to our statutory purpose, and so does not wish to comment on this consultation.*’

9 Conclusion

9.1 The Council concludes that, Merton's pre-submission Local Plan will not lead to adverse effects on the integrity of European sites either alone, or in combination with other plans and projects. None of the area visions or site allocations within Merton's draft Local Plan (pre-submission) is likely to have any significant discernible adverse impact therefore, with the exception of stage 2 (Appropriate Assessment and ascertaining the effect on site integrity) and stage 3 (mitigation and alternative solutions) of the HRA process are not considered necessary.

Appendix 1: Maps – insert PDF once report done!

Appendix 1: New Morden regeneration area boundary changes –[insert map here](#)

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 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 the unit 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 (Sites of Special Scientific Interest) 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.