



INITIAL
HABITAT SCREENING ASSESSMENT

Wandsworth Local Plan Partial Review (LPPR)

October 2023

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1. INTRODUCTION

1. Under European legislation, Wandsworth Council is required to undertake a Habitat Regulations Assessment (HRA) on local development planning documents and projects. HRA assesses the likely impacts of a plan's policies on the integrity of the Natura 2000 sites (also known as European sites). The purpose of the HRA is to ensure that the protection of the integrity of European sites is part of the planning process. The Council is currently preparing a partial review of the Local Plan (which was adopted in July 2023). The review will include a review and update of Policy LP23 Affordable Housing as set out in the Wandsworth Local Plan (2023 – 2038) and other policies as they relate to strengthening provision of homes for social rent for local people, together with any other consequential changes necessary for consistency.
2. The purpose of this report is to undertake an initial Stage 1 of the HRA process (screening) to establish whether or not the proposed change to the policy is likely to have a significant effect on Natura 2000 sites and, if so, whether an Appropriate Assessment is required (stage 2 of the HRA).
3. The Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Flora and Fauna - the 'Habitats Directive' - provides legal protection for habitats and species of European importance. Article 2 of the Directive requires the maintenance or restoration of habitats and species of interest to the EU in a favourable condition. This is implemented through a network of protected areas - Natura 2000 or European sites. Articles 6(3) and 6(4) of the Habitats Directive require an Appropriate Assessment of plans and projects likely to have a significant effect on a European site. The requirement for HRA in England is set down in the Conservation (Natural Habitats, & c) Regulations, 1994 in England and Wales, amended in 2007 and consolidated into the Conservation of Habitats and Species (Amendment) Regulations 2012 (SI No. 212/1927). This means that the effects of the LPPR on Natura 2000 sites need to be assessed to ensure that their integrity is maintained.
4. Paragraph 3, Article 6 of the Habitats Directive states that:

'Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to paragraph 4³, the competent national authority shall agree to the plan or project only having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public.'
5. There are two types of Natura 2000 sites – Special Area of Conservation (SAC) and Special Protection Area (SPA). RAMSAR (Convention on Wetlands of International Importance) sites and Sites of Community Importance (SCI) are also given equivalent status. SAC sites are important for their habitat features; SPA sites are important for bird populations; RAMSAR sites are internationally important wetlands; and SCIs are sites that have been adopted by the European Commission but not yet formally designated as SACs.
6. This document forms part of the evidence base for the Local Plan Partial Review (LPPR). While it is independent of the Sustainability Appraisal (SA), results of this screening exercise inform the SA for the LPPR. A previous HRA screening assessment on the adopted Local Plan 2023 was prepared that concluded that the Local Plan was not likely to result in significant effects or impact on the integrity

of any Natura 2000/European Site. In undertaking this review, the findings of the London Plan HRA have also been considered as part of the wider context.

2. METHODOLOGY

7. The Habitats Regulations process involves the following steps:
 - i. Screening: assessing likely significant effects;
 - ii. Scoping an appropriate assessment;
 - iii. Appropriate Assessment (AA);
 - iv. Adding avoidance/mitigation measures;
 - v. Formal consultation; and
 - vi. Recording the assessment.
8. Steps 1 and 2 are reported in this document. If the screening stage concludes that significant effects are likely on European sites, either alone or in combination with other plans, then a full Appropriate Assessment (Step 3) is required.
9. Article 6 (3) and (4) of the Habitats Directive sets out the requirement for assessment in order to determine whether the plan is ‘likely to have a significant effect’ on a European site. This is the screening stage of the process and determines whether further steps need to be taken. The Department of Communities and Local Government guidance⁴ states the following:

“The comprehensiveness of the assessment work undertaken should be proportionate to the geographical scope of the option and the nature and extent of any effects identified. The assessment should be confined to the effects on the internationally important habitats and species for which the site is classified. An AA need not be done in any more detail, or using more resources, than is useful for its purpose.”
10. This assessment of the Local Plan Partial Review, under the Habitats Regulations, was undertaken during the preparation of the LPPR, so that the assessment could influence the development of policies and their effects.

3. PROXIMITY TO EUROPEAN SITES

11. One European site lies partly within the borough (Wimbledon Common SAC) and one adjacent to the borough boundary (Richmond Park SAC). Consideration was given to include sites within a wider catchment area of 15km from the Wandsworth boundary. Using this catchment, the following European sites were identified:
 - Wimbledon Common (SAC)
 - Richmond Park (SAC)
 - Epping Forest (SAC)
 - Lee Valley (SPA & RAMSAR site)
 - South West London Waterbodies (SPA & RAMSAR site)
12. However, the Integrated Impact Assessment of the Wandsworth Local Plan Revised Scoping Report (December 2018) concluded that only Wimbledon Common SAC and Richmond Park SAC should be considered in the HRA screening exercise. The descopeing of the other European sites from the HRA was justified as follows:

- Epping Forest (SAC) - The Wandsworth Local Plan Habitats Regulations Assessment (April 2015) did not identify an impact pathway between activities resulting from the previous Wandsworth Local Plan (as adopted in 2016) and the SAC. It was not considered that residents would specifically travel to it for recreation and it was not thought the Wandsworth Local Plan would have any impact on the nitrogen pollution levels for this site given the distance from the borough. Given the similarities between the extant Local Plan and coverage of the Local Plan reviews, this site is scoped out of the HRA.
- Lee Valley (SPA & RAMSAR site) - The Wandsworth Local Plan Habitats Regulations Assessment (April 2015) did not identify an impact pathway between activities resulting from the previous Wandsworth Local Plan (as adopted in 2016) and the SPA / Ramsar site. The 2015 HRA Report states: “[More local wetland areas to the borough] are considered to be more likely recreational destinations for residents of the borough than the South West London Waterbodies or Lee Valley for those taking part in water sports and other water-based recreation and those interested in visiting wetland habitats.” It was also not considered likely that the Wandsworth Local Plan would have any impact on the nitrogen pollution levels for this site given the distance from the borough. Given the similarities between the extant Local Plan and coverage of the Local Plan reviews, this site is scoped out of the HRA.
- South West London Waterbodies (SPA & RAMSAR site) - The Wandsworth Local Plan Habitats Regulations Assessment (April 2015) did not identify an impact pathway between activities resulting from the previous Wandsworth Local Plan (as adopted in 2016) and the SPA / Ramsar site. The 2015 HRA Report states: “[More local wetland areas to the borough] are considered to be more likely recreational destinations for residents of the borough than the South West London Waterbodies or Lee Valley for those taking part in water sports and other water-based recreation and those interested in visiting wetland habitats.” It was also not considered likely that the Wandsworth Local Plan would have any impact on the nitrogen pollution levels for this site given the distance from the borough. Given the similarities between the extant Local Plan and coverage of the Local Plan reviews, this site is scoped out of the HRA.

13. Hence, this report considers whether the scope of the LPPR, in itself, or in combination with other plans, will adversely affect the integrity of Wimbledon Common and/or Richmond Park SACs.

4. SITE DESCRIPTIONS

14. Information for Wimbledon Common and Richmond Park, including the rationale for their declaration as European sites, was taken from the draft London Plan Habitats Regulations Assessment Screening (November 2017). This also includes supplementary information to assist in the assessment of the significance of any impacts of policies on their nature conservation interest as identified in the Integrated Impact Assessment of the Wandsworth Local Plan Revised Scoping Report (December 2018). This is presented below.

15. Wimbledon Common SAC

Designation Reason

Annex I habitats:

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

Annex II species:

- Stag Beetle *Lucanus cervus*

Conservation Objectives

Ensure that the integrity of the site is maintained or restored as appropriate and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring the:

- Extent and distribution of qualifying natural habitats and habitats of qualifying species.
- Structure and function (including typical species) of qualifying natural habitats.
- Structure and function of the habitats of qualifying species.
- Supporting processes on which qualifying natural habitats and the habitats of qualifying species rely.
- Populations of qualifying species.
- Distribution of qualifying species within the site.

Factors Affecting Integrity and Current Pressures

Atmospheric pollution (nutrient deposition and acidification).

Air pollution is also thought to be having an impact on the quality of heathland habitat.

Water quality - e.g. pollution through groundwater and surface run-off sources

Water level - maintenance of water table

Habitat fragmentation

Scrub encroachment

Spread of non-native / invasive species (specifically oak processionary moth *Thaumetopoea processionea*)

Intensive recreational pressure that can result in damage, particularly to the sensitive areas of heathland.

Inappropriate behaviour by some visitors (e.g. collection and removal of dead wood)

16. Richmond Park SAC

Designation Reason

Annex I habitats:

- Atlantic acidophilous beech forests with *Ilex* and sometimes also *Taxus* in the shrub layer (*Quercion roburipetraeae* or *Ilici-Fagenion*) (primary)
- Northern Atlantic wet heaths with *Erica tetralix* (secondary)
- European dry heaths (secondary)

Annex II species:

- Stag Beetle *Lucanus cervus*

Conservation Objectives

Ensure that the integrity of the site is maintained or restored as appropriate and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring the:

- Extent and distribution of qualifying natural habitats and habitats of qualifying species.
- Structure and function of the habitats of qualifying species.
- Supporting processes on which the habitats of qualifying species rely
- Populations of qualifying species.
- Distribution of qualifying species within the site.

Factors Affecting Integrity and Current Pressures

Atmospheric pollution (e.g. nitrous oxides from vehicle exhausts).

Air pollution is also thought to be having an impact on the quality of heathland habitat.

Water quality - nutrient enrichment from fertiliser run-off, etc.

Water level - maintenance of water table

Habitat fragmentation

Scrub encroachment (often due to undergrazing)

Development pressure

Spread of non-native / invasive species

Intensive recreational pressure that can result in damage, particularly to the sensitive areas of heathland.

Inappropriate behaviour by some visitors and human disturbance (off-road vehicles, burning, vandalism).

5. IMPACT TYPES

17. Understanding the various pathways that a land use plan can affect European sites is important. Pathways are routes by which a change in activity within Wandsworth borough can lead to an effect upon a European site. With regard to the category of European site for Wimbledon Common and Richmond Park, Government guidance⁵ establishes that the Appropriate Assessment (AA) should be 'proportionate to the geographical scope of the [plan policy]' and that 'an AA need not be done in any more detail, or using more resources, than is useful for its purpose' (CLG, 2006, p.68). As a result, there are screening limits for the Natura 2000 sites. The focus being on those for which recommended mitigation or alternatives to policy can contribute significantly towards the protection of those sites (i.e. Wimbledon Common and Richmond Park) and their nature conservation objectives (as outlined in Section 4).
18. The pathways that require consideration of their effects are:
- Recreational causes
 - Urbanisation
 - Impacts on surrounding habitat
 - Atmospheric pollution
 - Water resources
 - Water quality

These pathways, and the effect of the Local Plan Partial Review, are discussed below.

Recreational causes

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

Effects of Local Plan Partial Review

20. An increase in affordable housing is unlikely to have any impact in regard to recreational causes beyond that which has been identified in the January 2023 HRA.

Urbanisation

21. While urbanisation impacts are related to those for recreational; it is discussed separately as population in an area can create anti-social effects (such as fly tipping or vandalism) and inadvertently cause conditions with damaging consequences to species such as owning a domestic cat (predation), or causing light or noise pollution to bird or bat species. In some response to this, Natural England, on a number of different planning applications, has identified 400m from a SPA as the distance within which they felt no new development could be allowed because of the general 'urbanisation' effects that would be experienced by the SPA.

Effects of Local Plan Partial Review

22. An increase in affordable housing is unlikely to have any effect on recreational causes beyond as has been identified in January 2023 HRA.
23. Any urbanisation impacts as a result of the LPPR policies are unlikely to have an adverse effect on the conservation features for which the SACs are designated. Urbanisation in Wandsworth will not result in an adverse impact on the integrity of any of the sites.

Impacts on surrounding habitat

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

Effects of the Local Plan Partial Review

25. The impacts of LPPR policies are unlikely to have an adverse effect on the beetle species of the Wimbledon Common and Richmond Park SACs, nor are any species within Wandsworth borough, likely to have an adverse effect upon the beetles within the designated site, nor is this considered to have an adverse impact on the integrity of the sites. Wimbledon Common is also designated for its wet and dry heathland. Heathland protection and enhancement can be addressed through management practice for the Common.
26. Generally, Wandsworth borough will support populations of Stag Beetle, with back gardens being a favoured habitat as well as parks such as King George's Park. Further, the populations of Stag Beetles in areas distant from Richmond Park and Wimbledon Common are unlikely to have any relationship or bearing on the populations of the beetles in the two European sites. In addition, habitat supporting Stag Beetles in Wandsworth (parks, woodlands and larger gardens) are unlikely to be affected by development arising from the LPPR.

Atmospheric pollution

27. While there is limited information available on the effects of air quality on semi-natural habitats, the main pollutants of concern are well understood. Oxides of Nitrogen (NO_x) can have a directly toxic effect upon vegetation. NO_x emissions are mainly related to vehicle exhaust.
28. Sulphur dioxide (SO₂) and Ammonia emissions (NH₃) are the other main atmospheric pollutants. SO₂ is mainly concerned with the output of coal stations and industrial processes that require the combustion of coal and oil. NH₃ emissions are influenced by agriculture. As such, it is unlikely that there will be any fundamental increase in SO₂ and NH₃ emissions associated with the LPPR.
29. According to the World Health Organisation, the critical NO_x concentration (critical threshold) for the protection of vegetation is 30µg/m³. In addition, ecological studies have determined 'critical loads' of atmospheric nitrogen deposition (that is, NO_x combined with ammonia NH₃) for key habitats within the European sites considered within this assessment. Wimbledon Common has NO_x concentration that exceeds the critical level. The Air Pollution Information System⁶ concludes that whilst the woodland habitats which Stag Beetle inhabit are vulnerable to nitrogen deposition, Stag Beetles themselves are not vulnerable to nitrogen deposition. The main reason cited is that 'nitrogen deposition is not believed to have a direct, major effect on tree growth in the UK'⁷ and thus the cycle of tree growth and death should continue, as should a continued supply of dead wood.
30. The most acute impacts of NO_x take place close to where they are emitted, but individual sources of pollution will also contribute to an increase in the general background levels of pollutants at a wider scale, as small amounts of NO_x and other pollutants from the pollution source are dispersed more widely by the prevailing winds. Prevailing winds in Wandsworth are generally from the west⁸, which would take Wandsworth's pollution away from Wimbledon Common and Richmond Park.
31. In terms of diffuse air pollution, Natural England has previously advised that effects of vehicular atmospheric emissions should be considered if roads are closer than 200m from a Nature 2000 site. The implication of this is that any long-range contribution made to 'background' concentrations of NO_x or other atmospheric pollutants by the development which may arise from the LPPR is outside the remit of the HRA for the LPPR. Therefore, the issue of 'long-range' pollution need not be considered within this HRA.

Effects of the Local Plan Partial Review

32. Given the above on SO₂ and NH₃, it is unlikely that there will be any increase in these emissions associated with the LPPR.

Water Resources

33. London and the south east of England have been classified as areas under serious water stress. Attributable to climate change, London and south east England is expected to experience hotter, drier summers and warmer, wetter winters, and more extreme weather events, including drought. In the short and medium term, it should be a priority to reduce water stress of European sites.

Effects of the Local Plan Partial Review

34. It is unlikely that any increase in affordable housing will adversely affect or impact on the integrity of the two sites for reasons pertaining to water resources. This is because 80% of public water supply for London comes from storage reservoirs connected to the River Thames and River Lea through the Thames Water Ring Main, with the remaining 20% coming from groundwater supplies of the confined chalk aquifer. Increases in water demand are unlikely to adversely affect sites or impact on their integrity due to the Environment Agency's Review of Consents (whereby new abstraction

licenses may not be granted if they will harm a European Site) and that Thames Water uses pumping stations to abstract water from unused underground water springs in east London.

Water quality

35. Increased amounts of development can lead to reduced water quality of rivers and estuarine environments. Sewage and industrial effluent discharges can contribute to increased nutrients on European sites leading to unfavourable conditions. In addition, diffuse pollution, partly from urban run-off has been identified during an Environment Agency Review of Consents process, as being a major factor in causing unfavourable condition of European sites.
36. The quality of the water that feeds European sites is an important determinant of the nature of their habitats and the species they support. Poor water quality can have a range of environmental impacts.
37. For sewage treatment works close to capacity, further development may increase the risk of effluent escape into aquatic environments. In many urban areas including London, sewage treatment and surface water drainage systems are combined, and therefore a predicted increase in flood and storm events could increase pollution risk. Construction of the Thames Tideway Tunnel seeks to alleviate this risk.

Effects of the Local Plan Partial Review

38. Any increases in wastewater resulting from the LPPR policies are not likely to affect the two Natura 2000 sites as wastewater is treated at the Crossness Treatment Plant and discharged into the Thames. The treatment plant is located east of Wimbledon Common and Richmond Park avoiding any potential pathway with them.
39. Moreover, the 25km Thames Tideway Tunnel (TTT) will run underground from Acton storm tanks in west London, and travel roughly the line of the River Thames to Abbey Mills Pumping Station in east London. It is scheduled to be completed in 2023. The new sewer tunnel will intercept 34 existing sewage discharge points along the river, preventing pollution from spilling into the Thames and diverting it to Beckton Treatment Plant for treatment.

6. SCREENING ANALYSIS

40. The LPPR has been assessed (see Table 2) against the adapted criteria in Table 1 below. This sets out four categories of potential effects as:
 - **Category A:** elements of the plan / options that would have **no negative effect** on a European site at all.
 - **Category B:** elements of the plan / options that could have an effect, but the likelihood is there would be **no significant negative effect** on a European site either alone or in combination with other elements of the same plan, or other plans or projects.
 - **Category C:** elements of the plan / options that could or would be likely to have a **significant effect** alone and will require the plan to be subject to an appropriate assessment before the plan may be adopted;
 - **Category D:** elements of the plan / options that would be likely to have a **significant effect in combination** with other elements of the same plan, or other plans or projects and will require the plan to be subject to an appropriate assessment before the plan may be adopted.

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

Table 1: Criteria to assist in determining adverse effects on European Sites

Category	Ref	Explanation
A: No negative effect	A1	Policies that will not themselves lead to development e.g. because they relate to design or other qualitative criteria for development, or they are not a land use planning policy.
	A2	Policies intended to protect the natural environment, including biodiversity.
	A3	Policies intended to conserve/enhance the natural/built/historic environment, where enhancement measures will not be likely to have any negative effect on a European Site.
	A4	Policies that positively steer development away from European sites and associated sensitive areas.
	A5	Policies that would have no effect because no development could occur through the policy itself, the development being implemented through later policies in the same plan, which are more specific and therefore more appropriate to assess for their effects on European Sites and associated sensitive areas.
B: No Significant effect	B	Effects are trivial or 'de minimis', even if combined with other effects
C: Significant effect alone	C1	The option, policy or proposal could directly affect a European site because it provides for, or steers, a quantity or type of development onto a European site, or adjacent to it
	C2	The option, policy or proposal could indirectly affect a European site e.g. because it provides for, or steers, a quantity or type of development that may be very close to it, or ecologically, hydrologically or physically connected to it or it may increase disturbance as a result of increased recreational pressures
	C3	Proposals for a magnitude of development that, no matter where it was located, the development would be likely to have a significant effect on a European site
	C4	An option, or policy that makes provision for a quantity / type of development (and may indicate one or more broad locations e.g. a particular part of the plan area), but the effects are uncertain because the detailed location of the development is to be selected following consideration of options in a later, more specific plan. The consideration of options in the later plan will assess potential effects on European Sites, but because the development could possibly affect a European site a significant effect cannot be ruled out on the basis of objective information

	C5	Options, policies or proposals for developments or infrastructure projects that could block options or alternatives for the provision of other development or projects in the future, that will be required in the public interest, that may lead to adverse effects on European sites, which would otherwise be avoided
	C6	Options, policies or proposals which depend on how the policies etc are implemented in due course, for example, through the development management process. There is a theoretical possibility that if implemented in one or more particular ways, the proposal could possibly have a significant effect on a European site
	C7	Any other options, policies or proposals that would be vulnerable to failure under the Habitats Regulations at project assessment stage; to include them in the plan would be regarded by the EC as 'faulty planning'
	C8	Any other proposal that may have an adverse effect on a European site, which might try to pass the tests of the Habitats Regulations at project assessment stage by arguing that the plan provides the imperative reasons of overriding public interest to justify its consent despite a negative assessment
D: Significant effect in combination	D1	The option/policy/proposal alone would not be likely to have significant effects but if its effects are combined with the effects of other policies/proposals provided for or coordinated by the LDD (internally), cumulative effects would be likely to be significant
	D2	Options, policies or proposals that alone would not be likely to have significant effects but if their effects are combined with the effects of other plans or projects, and possibly the effects of other developments provided for in the LDD as well, the combined effects would be likely to be significant
	D3	Options or proposals that are, or could be, part of a programme or sequence of development delivered over a period, where the implementation of the early stages would not have a significant effect on European sites, but which would dictate the nature, scale, duration, location, timing of the whole project, the later stages of which could have an adverse effect on such sites

42. Table 2 provides an assessment of the LPPR policy against the criteria presented in Table 1 above. This shows that the LPPR will have no adverse impact on Wimbledon Common and Richmond Park SACs. Consequently, there are no essential recommendations made.

Table 2: Assessment of LPPR policies

Policy		Likely to have an impact	Reason	Essential recommendations to avoid adverse effect
LP23	Affordable Housing	No	A1	None

In combination effects

43. The assessment (Table 2) has not identified any significant adverse effects arising from the LPPR alone. However, Wandsworth does not sit in isolation and consideration should be made of the potential for effects in combination with development in other boroughs. Greater London Authority Plan Habitats Regulations Assessment Modifications Update (December 2019) has been reviewed. This established for Richmond Park SAC:

“The London Plan does not have any impact pathways that could interact with the SAC in a manner that would prevent it achieving its conservation objectives for stag beetle.”

And for Wimbledon Common SAC:

“The scale of growth proposed for Merton, Kingston and Wandsworth in the London Plan is not likely to result in a significant recreational pressure effect on Wimbledon Common SAC alone or in combination with other plans and projects...The Mayor’s air quality policies in the draft London Plan, The Mayor’s Transport Strategy and the London Environment Strategy will improve air quality ...even allowing for growth in population and jobs, as will the specific major transport initiatives associated with the growth area around Wimbledon [and] does not result in adverse effects upon European designated sites, either alone or in combination. Rather, it will play a crucially important part in improving air quality.”

44. Critically, the HRA Modifications Update concluded:

“It is...considered that there are sufficient protective mechanisms in place to ensure that the growth objectives of the London Plan can be delivered without an adverse effect on the integrity of European sites, either alone or in combination with other plans and projects.”

45. Available HRA's for the local plans of neighbouring boroughs¹² have been reviewed. All of these assessments found that their local plans will not have an adverse impact on the European Sites. It can be concluded that there will be no 'in-combination' effects.

7. CONCLUSION

46. This screening assessment of the LPPR has not identified any likely significant effects or impacts on the integrity of any European Site. In determining this, the methodology outlined below (and in Section 2 and 3) was followed.
47. The identification of European Sites within 15km is a standard that has previously been agreed with Natural England as the distance at which pathways of impact may be likely to occur. The sites which fall within 15km of the Wandsworth borough boundary (either wholly or in part) are Wimbledon Common (SAC), Richmond Park (SAC), Epping Forest (SAC), Lee Valley (SPA & RAMSAR site) and South West London Waterbodies (SPA & RAMSAR site). The Integrated Impact Assessment of the Wandsworth Local Plan Revised Scoping Report (December 2018) concluded that Wimbledon Common SAC and Richmond Park SAC should be considered in the HRA screening exercise and the other sites could be descoped.
48. The assessment reviewed the reasons for the scoped sites’ designation and identified key vulnerabilities. These are outlined in Table 3 below:

Table 3: Key features and vulnerabilities of Scoped European Sites

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

49. Pathways of impact were identified and assessed. Potential pathways include recreational causes, urbanisation, impacts on surrounding habitat, atmospheric pollution, water resources and water quality. The assessment has found that the LPPR is unlikely to have adverse effects on the European Sites or their integrity. A summary of the potential pathways is provided in Table 4 below.

Table 4: Potential Pathways to European Sites

Potential Pathway to Cause Adverse Effect – Yes/No?	Reasons
Recreational - No	Wandsworth borough has a number of open spaces (existing and proposed) available much more locally to the majority of residents than the European Sites. The scale of development resulting from the LPPR is unlikely to significantly increase recreational pressure in Richmond Park.

Urbanisation and on Surrounding Habitats - No	Development resulting from the LPPR is unlikely to result in adverse impacts on the integrity of the sites.
Atmospheric Pollution – No	Policy will not affect air quality.
Water Resources and Quality - No	<p>Wastewater is treated at the Crossness Treatment Plant and discharged into the Thames. The Thames Tideway Tunnel will manage wastewater effectively in the medium term.</p> <p>Environment Agency’s Review of Consents (whereby new abstraction licenses may not be granted if they will harm a European Site)</p> <p>80% of public water supply for London comes from storage reservoirs connected to the River Thames and River Lee, with the remaining 20% coming from groundwater supplies of the confined chalk aquifer.</p>

50. The screening analysis of the LPPR involved examining the policy’s significant effects on the European sites against established criteria. The policy was deemed to fall under Category A - no negative effects.
51. Recognising that the LPPR does not exist in isolation, an in-combination assessment was also undertaken. Neighbouring boroughs’ HRA’s were reviewed including the HRA on the draft London Plan. Taking these into account, there will be no in-combination effects on the integrity of the two sites.
52. In summary, this screening assessment on the LPPR has not identified any significant adverse effects on any Natura 2000 site; particularly Wimbledon Common SAC or Richmond Park SAC. Similarly, the LPPR will not have an adverse impact on the integrity of these. Consequently, the Appropriate Assessment stage is not required on the LPPR.
53. The Council will seek the views of Natural England on the conclusion of this initial HRA screening assessment.