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London Borough of Richmond upon Thames Publication Local Plan

Habitats Regulations Assessment Report

HRA Report
Prepared by LUC
December 2016

Project Title: Habitats Regulations Assessment for the London Borough of Richmond-upon-Thames
Publication Local Plan

Client: London Borough of Richmond-upon-Thames

Version	Date	Version Details	Prepared by	Checked by	Approved by
1	17/11/16	Draft HRA Report for the LBRuT Publication Local Plan	Katherine Sydney Sarah Temple	Taran Livingston	Taran Livingston
2	01/12/16	Final HRA Report for the LBRuT Publication Local Plan	Katherine Sydney Sarah Temple	Jon Grantham	Jon Grantham



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1 Introduction

- 1.1 LUC has been commissioned by the London Borough of Richmond upon Thames (LBRuT) to carry out a Habitats Regulations Assessment (HRA) of its Local Plan. This report presents the methodology and findings of the HRA.

Background to the preparation of the new Local Plan

- 1.2 LBRuT is producing a new Local Plan for the borough, which will replace the existing Core Strategy and Development Management Plan. Once adopted, the Local Plan will set out policies and guidance for development of the borough over the next 15 years (2018 to 2033, once published). The current version of the Local Plan is the Publication Local Plan and is the version that this HRA is based on.
- 1.3 The borough's Core Strategy was adopted in 2009 and supplemented in 2011 by the Development Management Plan, which added further detailed policies for managing new development in the borough. In the process of preparing the new Local Plan, LBRuT published a Site Allocations Development Plan Document (DPD) in 2014, which identified sites suitable for development within the borough. A revised list of site allocations was incorporated into the Pre-Publication Local Plan, alongside updated policies. Following consultation on the Pre-Publication Local Plan, these have now been finalised in the Publication version of the Local Plan.

The requirement to undertake Habitats Regulations Assessment of Development Plans

- 1.4 The requirement to undertake HRA of development plans was confirmed by the amendments to the Habitats Regulations published for England and Wales in July 2007 and updated in 2010¹ and again in 2012². Therefore when preparing the new Local Plan, LBRuT is required by law to carry out a Habitats Regulations Assessment although consultants can undertake the HRA on its behalf. The requirement for authorities to comply with the Habitats Regulations when preparing a Local Plan is explained in the outline National Planning Practice Guidance (NPPG).
- 1.5 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):
- SPAs are classified under the European Council Directive 'on the conservation of wild birds' (79/409/EEC; 'Birds Directive') for the protection of wild birds and their habitats (including particularly rare and vulnerable species listed in Annex 1 of the Birds Directive, and migratory species).
 - SACs are designated under the Habitats Directive and target particular habitats (Annex 1) and/or species (Annex II) identified as being of European importance.
- 1.6 Potential SPAs (pSPAs)³, candidate SACs (cSACs)⁴, Sites of Community Importance (SCIs)⁵ and Ramsar sites should also be included in the assessment.

¹ The Conservation (Natural Habitats, &c.) (Amendment) Regulations 2007. HMSO Statutory Instrument 2007 No. 1843. From 1 April 2010, these were consolidated and replaced by the Conservation of Habitats and Species Regulations 2010 (SI No. 2010/490). Note that no substantive changes to existing policies or procedures have been made in the new version.

² The Conservation of Habitats and Species (Amendment) Regulations 2012. Statutory Instrument 2012 No. 1927.

³ Potential SPAs are sites that have been approved by Government and are currently in the process of being classified as SPAs.

⁴ Candidate SACs are sites that have been submitted to the European Commission, but not yet formally adopted.

⁵ SCIs are sites that have been adopted by the European Commission but not yet formally designated as SACs by the Government.

- 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).

1.7 For ease of reference during HRA, these designations are collectively referred to as European sites⁶ despite Ramsar designations being at the international level.

1.8 The overall purpose of the HRA is to conclude whether or not a proposal or policy, or whole development plan, would adversely affect the integrity of the site in question either alone or in combination with other plans. This is judged in terms of the implications of the plan for a site's 'qualifying features' (i.e. those Annex I habitats, Annex II species, and Annex I bird populations for which it has been designated). Significantly, HRA is based on the precautionary principle meaning that where uncertainty or doubt remains, an adverse impact should be assumed.

Stages of the Habitats Regulations Assessment

1.9 **Table 1.1** below summarises the stages involved in carrying out a full HRA, based on various guidance documents^{7,8}.

Table 1.1 Stages in HRA

Stage	Task	Outcome
Stage 1: Screening (the 'Significance Test')	Description of the plan. Identification of potential effects on European Sites. Assessing the effects on European Sites (taking into account potential mitigation provided by other policies in the plan).	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.
Stage 2: Appropriate Assessment (the 'Integrity Test')	Gather information (plan and European Sites). Impact prediction. Evaluation of impacts in view of conservation objectives. Where impacts considered to affect qualifying features, identify alternative options. Assess alternative options. If no alternatives exist, define and evaluate mitigation measures where necessary.	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 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.
Stage 3: Assessment where no alternatives exist and adverse impacts remain taking into account mitigation	Identify and demonstrate 'imperative reasons of overriding public interest' (IROPI). Demonstrate no alternatives exist. Identify potential compensatory measures.	This stage should be avoided if at all possible. The test of IROPI and the requirements for compensation are extremely onerous.

⁶ Often referred to as Natura 2000 sites, elsewhere; the two terms are used interchangeably.

⁷ *Planning for the Protection of European Sites. Guidance for Regional Spatial Strategies and Local Development Documents.* Department for Communities and Local Government (DCLG), August 2006.

⁸ *The HRA Handbook.* David Tyldesley & Associates, a subscription based online guidance document: <https://www.dtapublications.co.uk/handbook/>

- 1.10 In assessing the effects of the Publication Local Plan in accordance with Regulation 102 of the Conservation of Habitats and Species Regulations 2010, 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. 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'). [These two steps are undertaken as part of Stage 1: Screening shown in Table 1.1 above.] 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 general public. [This step is undertaken during Stage 2: Appropriate Assessment shown in Table 1.1 above.]
 - 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.
- 1.11 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 generally 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.
- 1.12 The HRA should be undertaken by the 'competent authority' - in this case the LBRuT, and LUC has been commissioned to do this on its behalf. The HRA also requires close working with Natural England as the statutory nature conservation body⁹ in order to obtain the necessary information and agree the process, outcomes and any mitigation proposals. Comments provided by Natural England in relation to previous iterations of the Local Plan and HRA have been taken into account. In addition, LUC has contacted Natural England regarding the approach to take for this version of the HRA and they supported taking a similar approach to the work undertaken for the 2014 Site Allocations DPD. Natural England's comments and the responses to them (where applicable) are provided in **Appendix 4**. The Environment Agency, while not a statutory consultee for the HRA, is also in a strong position to provide advice and information throughout the process as it is required to undertake HRA for its existing licences and future licensing of activities.

Previous HRA work

Core Strategy HRA

- 1.13 Baker Shepherd Gillespie was appointed by LBRuT in August 2007 to carry out an HRA¹⁰ of the Core Strategy¹¹. The HRA, which informed LUC's 2014 work on the Site Allocations DPD concluded that the Core Strategy would not result in policies that promote development that is likely to have a significant effect on a European site. An Appropriate Assessment was therefore not required.

⁹ Regulation 5 of *The Conservation of Habitats and Species Regulations 2010*. HMSO Statutory Instrument 2010 No. 490.

¹⁰ Baker Shepherd Gillespie (August 2007) *Assessment of likely significant effect* - <http://www.richmond.gov.uk/finalreportsept07-2.pdf>

¹¹ London Borough of Richmond upon Thames (April 2009) *Core Strategy* - http://www.richmond.gov.uk/core_strategy-3.pdf

Development Management Plan HRA

- 1.14 Natural England confirmed in 2010 that the Development Management Plan¹² did not require a full Habitats Regulations Assessment/Appropriate Assessment because it sets out policies and guidance; it is not a specific project or development proposal and therefore Natural England agreed with the Council's conclusion not to undertake an Appropriate Assessment in respect of this document.

Site Allocations DPD (Publication version) HRA

- 1.15 In 2014, LUC undertook an HRA of the Site Allocations DPD (Publication version), which this current HRA report builds upon. The 66 sites in the Site Allocations DPD were assessed in the HRA, which concluded that no significant effects on European sites would be likely to arise as a result of the allocated sites. The majority of those 66 sites are allocated in the Publication Local Plan, although some have been deleted or added.

Structure of the HRA Report

- 1.16 This chapter (Chapter 1) has introduced the requirement to undertake HRA of the LBRuT Publication Local Plan. The remainder of the report is structured as follows:
- **Chapter 2: The Publication Local Plan** summarises the content of the Publication version of the Local Plan, which is the subject of this report.
 - **Chapter 3: Screening Methodology** sets out the approach used and the specific tasks undertaken during the screening stage of the HRA.
 - **Chapter 4: Screening Findings** describes the findings of the screening stage of the HRA.
 - **Chapter 5: Appropriate Assessment** sets out the methodology and findings of the Appropriate Assessment stage of the HRA.
 - **Chapter 6: Conclusions** summarises the HRA conclusions for the Publication version of the Local Plan and describes the next steps to be undertaken.

¹² London Borough of Richmond upon Thames (November 2011) *Development Management Plan* - http://www.richmond.gov.uk/final_development_management_plan_adopted_nov_2011.pdf

2 The Publication Local Plan

- 2.1 The Publication Local Plan sets out the overall vision for the borough, along with general policies and site-specific proposals that all contribute towards the proposed levels of development in the borough. These are summarised below.

Strategic context and vision

- 2.2 Three inter-related themes of 'Protecting Local Character', 'A Sustainable Future' and 'Meeting People's Needs' provide a common thread that runs through the Local Plan. They form the basis of the Strategic Vision for LBRuT as follows:

Our vision for the London Borough of Richmond upon Thames over the next 15 years is to build on the success of maintaining and enhancing the borough's villages, its unique character and developing a strong and varied sense of place, in partnership with local communities and other key stakeholders.

1. PROTECTING LOCAL CHARACTER

Villages and historic environment

The borough's villages and their special and distinctive characters will have been protected, with each being unique, recognisable and important to the community and to the character of the borough as a whole. They will continue to maintain and enhance their distinctiveness in terms of the community, facilities and local character. Listed Buildings and Conservation Areas as well as Royal Botanical Gardens, Kew World Heritage Site, which contribute so significantly to the character of this borough, will have been protected and enhanced.

Residential quality of life

Richmond borough will be the best place in London to live as a result of the quality of the built environment and the high quality design of new development that respects and enhances its distinctive character. The amenity of residents and local neighbourhoods will have been protected and action taken on environmental issues and pollution. The quiet and peaceful nature of the borough, alongside its breathtakingly beautiful parks and open spaces, will continue to ensure that all Richmond borough residents cherish their local area as a place to live.

Natural environment, open spaces and the borough's rivers

The outstanding natural environment and green infrastructure network, including the borough's parks and open spaces, biodiversity and habitats as well as the unique environment of the borough's rivers and their corridors will have been protected and enhanced where possible. Residents will continue to highly value and cherish the borough's exceptional environmental quality.

2. A SUSTAINABLE FUTURE

Sustainable growth and transport

The borough's main centres will have accommodated the majority of higher density and larger scale developments, thus enabling people to walk to shops and services or use public transport. New development will be of exceptional design quality and will have respected the borough's environmental capacity and constraints through the optimisation of land. Development opportunities outside of the main centres will have been realised and well integrated within existing communities, the environment and infrastructure. Local communities will enjoy the new village heart in Mortlake and residents will

Whilst cars will still be a significant part of our future, the borough's improved transport network and interchanges will encourage many residents as well as those who work and visit the borough to make journeys using high quality public transport and walking and cycling routes. The built environment, spaces and public realm will be attractive and pleasant, and residents will have increasingly adopted active and healthy lifestyles and enjoy the borough's cycling and walking networks.

The borough and its interrelationship with Greater London and the South East

The borough will continue to relate in a sustainable way to Greater London and the South East in terms of providing homes, jobs, shops and services. Local communities and residents from neighbouring and other London boroughs as well as the wider region will enjoy the borough's exceptional parks, open spaces and recreational and cultural opportunities. The borough's reputation and role in providing the green lung for south west London will be recognised and cherished in Greater London and beyond.

The borough will continue to be an attractive and inviting place, and visitors will come to the borough to enjoy the many tourist attractions, including the unique, historic and cultural assets that are connected by the River Thames.

A sustainable and smart borough

The Council will have played its part in minimising vulnerability of people and property to a changing climate, including mitigating and adapting to the effects of climate change and supporting the move towards zero carbon. The borough will be a place where innovation and Smart City technology is harnessed to enable innovative digital and communications infrastructure, enabling businesses to respond to customer demand, and to support the borough on its path to becoming smarter.

3. MEETING PEOPLE'S NEEDS

Facilities to meet needs

Residents will have a choice of new homes, including affordable homes, as well as the infrastructure required to support their daily needs. They will have access to a range of exceptional educational and training facilities, including a choice of schools and nurseries, community facilities, shops and services as well as employment and recreational activities. Residents will have benefited from local training and employment opportunities, and they will continue to enjoy the strong sense of community and inclusiveness as well as social interaction and cohesion.

The borough's centres

The borough's centres, including the main centres as well as local and neighbourhood centres and parades, will continue to perform well and flourish. Central Richmond will continue to thrive and a new and improved station will provide a welcoming and pleasant environment for all those that live, work and visit the borough. Twickenham, including the station and surrounding area as well as the riverside, will have been rejuvenated and developed into a flourishing and vibrant business and cultural centre. Whitton, Teddington and East Sheen will have maintained and enhanced their role in providing shops, services and employment opportunities for local communities.

Jobs and the local economy

The borough's local economy will be successful. Jobs will be readily available and there will be a choice of employment opportunities as the borough's Key Office Areas as well as the industrial land and business parks will have been protected from encroaching residential development. Employment space will have supported new business start-ups and enabled businesses to grow. There will continue to be a high proportion and variety of small local businesses, offering local jobs, and further opportunities for residents to set up their own enterprise.

Strategic objectives

- 2.3 The Publication Local Plan then sets out 30 Strategic Objectives, which will need to be achieved to deliver the plan's strategic vision. The objectives also set out how the key sustainability issues facing the borough will be addressed.
- 2.4 Protecting Local Character
1. Maintain and enhance the borough's attractive villages, including the unique, distinctive and recognisable local characters of the different village areas and their sub-areas.
 2. Protect and, where possible, enhance the environment including the heritage assets, retain and improve the character and appearance of established residential areas, and ensure new development and public spaces are of high quality design.
 3. Protect and improve the borough's parks and open spaces to provide a high quality environment for local communities and provide a balance between areas for quiet enjoyment and wildlife and areas to be used for sports, games and recreation.
 4. Protect and enhance the borough's network of green infrastructure that performs a wide range of functions for residents, visitors, biodiversity and the economy.
 5. Protect and enhance the borough's biodiversity, including trees and landscape, both within open spaces but also within the built environment and along wildlife corridors.
 6. Protect and improve the unique environment of the borough's rivers, especially the River Thames and its tributaries as wildlife corridors, as opportunities for recreation and river transport where possible, increasing access to and alongside the rivers where appropriate, and gain wider local community benefits when sites are redeveloped.
- 2.5 A Sustainable Future
1. Minimise and mitigate the effects of climate change by requiring high levels of sustainable design and construction including reductions in carbon dioxide emissions by minimising energy consumption, promoting decentralised energy and the use of renewable energy as well as requiring high standards of water efficiency.
 2. Promote and encourage development to be fully resilient to the future impacts of climate change in order to minimise vulnerability of people and property; this includes by risk of flooding, water shortages, subsidence and the effects of overheating.
 3. Optimise the use of land and resources by ensuring new development takes place on previously developed land, reusing existing buildings and encouraging remediation and reuse of contaminated land.
 4. Reduce or mitigate environmental impacts and pollution levels (such as air, noise, light, odour, fumes water and soil) and encourage improvements in air quality, particularly along major roads and areas that already exceed acceptable air quality standards.
 5. Ensure local environmental impacts of development are not detrimental to the health, safety and the amenity of existing and new users or occupiers of a development or the surrounding area.
 6. Promote safe and sustainable transport choices, including public transport, cycling and walking, for all people, including those with disabilities.
 7. Encourage improvements to public transport, including quality and connectivity of transport interchanges, and support the use of Smart City technology and practices.
 8. Promote sustainable waste management through minimising waste and providing sufficient land for the reuse, recycling and treatment of waste, and minimise the amount of waste going to landfill in line with the West London Waste Plan.
 9. Support sustainable growth of the visitor economy for the benefit of local communities and promote the borough as an attractive and inviting place to visit and enjoy.
 10. Conserve and enhance the borough's unique, historic and cultural assets that are connected by the River Thames.

11. Create attractive and pleasant environments and spaces that promote active and healthy lifestyles, including recognising their benefits to residents' social life and their economic benefits to the borough's centres.

2.6 Meeting People's Needs

1. Ensure there is adequate provision of facilities for community and social infrastructure that are important for the quality of life of residents and which support the growing population, by protecting existing and, where required, securing new facilities and services that meet people's needs.
2. Ensure there is sufficient provision of facilities and services for education and training for all age groups to help reduce inequalities and support the local economy; this includes school places as well as children's centres and youth provision and promoting local employment opportunities and training programmes.
3. Ensure there is a suitable stock and mix of high quality housing that reflects local needs by providing a choice of housing types and sizes, with higher density development located in more sustainable locations, such as the borough's centres and areas better served by public transport.
4. Pursue all opportunities to maximise affordable housing across the borough through a range of measures, including providing more choice in the different types of affordable housing and different levels of affordability.
5. Ensure there continues to be good provision of, and access to, shopping and other local services and facilities that meet the needs of our communities.
6. Reinforce the role of Richmond, Twickenham, Teddington, Whitton and East Sheen centres, which play an important role in the provision of shops, services, employment and housing as well as being a focus for community and cultural life.
7. Ensure that local neighbourhood centres as well as parades of local importance provide a focus for local communities to meet, shop, work and spend leisure time.
8. Encourage opportunities for leisure, entertainment, sport, cultural activity and the development of community life.
9. Ensure there continues to be a wide variety of employment and training opportunities available to residents and support for business.
10. Protect and encourage land for employment use, particularly for affordable small / medium spaces, start-up and incubator units and flexible employment space, in order to support the borough's current and future economic and employment needs.
11. Facilitate inward investment and support businesses, particularly small and medium-sized enterprises and creative industries to grow the employment base of the borough.
12. Encourage the creation of healthy environments and support healthy and active lifestyles, including through measures to reduce health inequalities. This includes ensuring there is an appropriate range of health facilities that meet local needs, and tackling childhood obesity by restricting access to unhealthy foods, particularly fast food takeaways, in proximity to schools.
13. Promote inclusive and sustainable communities, social interaction, cohesive, healthy and dementia-friendly communities, and enable the older population to remain independent and active for longer.

Spatial strategy

- 2.7 The Publication Local Plan aims to meet the needs of local communities and businesses through the provision of:

- Housing;
- Employment;

- Schools;
 - Community services;
 - Social infrastructure;
 - Leisure; and
 - Other local services
- 2.8 The Spatial Strategy emphasises that local community needs, including delivery of housing and the infrastructure required to support it, are expected to be met without compromising the quality of the natural and built environment. This means in particular that the highly valued network of green infrastructure, including its contribution to biodiversity objectives, will be protected and where possible enhanced.
- 2.9 The Local Plan sets a target for an additional 4,725 homes for the period 2015-2025. This is in line with the target for the borough set by The London Plan (March 2016)¹³. For employment land, the main focus of the Local Plan is on the retention of existing sites and avoiding their loss for housing or other uses.
- 2.10 Chapters 4-12 of the Publication Local Plan then set out draft policies within the following sections:
- Local Character and Design
 - Green Infrastructure
 - Climate Change and Sustainable Design
 - Borough Centres
 - Community Facilities
 - Housing
 - Employment and Local Economy
 - Transport
 - Site Allocations
- 2.11 The final section of the document sets out an Implementation Plan for the Local Plan.
- 2.12 The 'Site Allocations' section of the Publication Local Plan builds on the earlier Site Allocations DPD published in 2013. It identifies 28 key sites that are considered to assist with the delivery of the borough's Spatial Strategy, identifying the following types of development:
- Employment;
 - Retail;
 - Housing; and
 - Social infrastructure.
- 2.13 **Figure 3.2** in **Chapter 3** of this report maps the locations of the proposed site allocations.

Potential impacts of the Local Plan on European sites

- 2.14 **Table 2.1** below sets out the range of potential impacts that development of the type to be included in the Publication Local Plan and related activities may have on European sites. This table has been prepared by LUC for use in informing HRA judgements, drawing on our experience of HRA and comments previously provided by Natural England relating to the potential impacts and activities that could affect European sites.

¹³ https://www.london.gov.uk/sites/default/files/the_london_plan_malp_final_for_web_0606_0.pdf

Table 2.1 Potential impacts and activities arising from implementation of the Local Plan that could adversely affect European sites

Broad categories and examples of potential impacts on European sites	Examples of activities responsible for impacts
<p>Physical loss</p> <ul style="list-style-type: none"> • Removal (including offsite effects, e.g. foraging habitat) • Smothering • Habitat degradation 	<p>Development (e.g. housing, employment, infrastructure, tourism) Structural alterations to buildings (bat roosts) Afforestation Tipping Cessation of or inappropriate management for nature conservation</p>
<p>Physical damage</p> <ul style="list-style-type: none"> • Direct mortality • Sedimentation / silting • Prevention of natural processes • Habitat degradation • Erosion • Trampling • Fragmentation • Severance / barrier effect • Edge effects • Fire 	<p>Flood defences Dredging Recreation (e.g. motor cycling, cycling, walking, horse riding, water sports, caving) Development (e.g. infrastructure, tourism, adjacent housing etc.) Vandalism Arson Cessation of or 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 Vehicular traffic Artificial lighting (e.g. street lighting)</p>
<p>Water table/availability</p> <ul style="list-style-type: none"> • Drying • Flooding / stormwater • Water level and stability • Water flow (e.g. reduction in velocity of surface water) • Barrier effect (on migratory species) 	<p>Water abstraction Drainage interception (e.g. reservoir, dam, infrastructure and other development) Increased discharge (e.g. drainage, runoff)</p>
<p>Toxic contamination</p> <ul style="list-style-type: none"> • Water pollution • Soil contamination • Air pollution 	<p>Oil / chemical spills Tipping 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) • Algal blooms • Changes in salinity • Changes in thermal regime • Changes in turbidity • Air pollution (dust) 	<p>Sewage discharge Water abstraction Industrial activity Flood defences Construction</p>
<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 • Rapid population fluctuations • Natural succession 	<p>Development (e.g. housing areas with domestic and public gardens) Predation by domestic pets Introduction of non-native species (e.g. from gardens) Fishing Hunting Changes in management practices (e.g. grazing regimes, access controls, cutting / clearing)</p>

3 HRA Screening Methodology

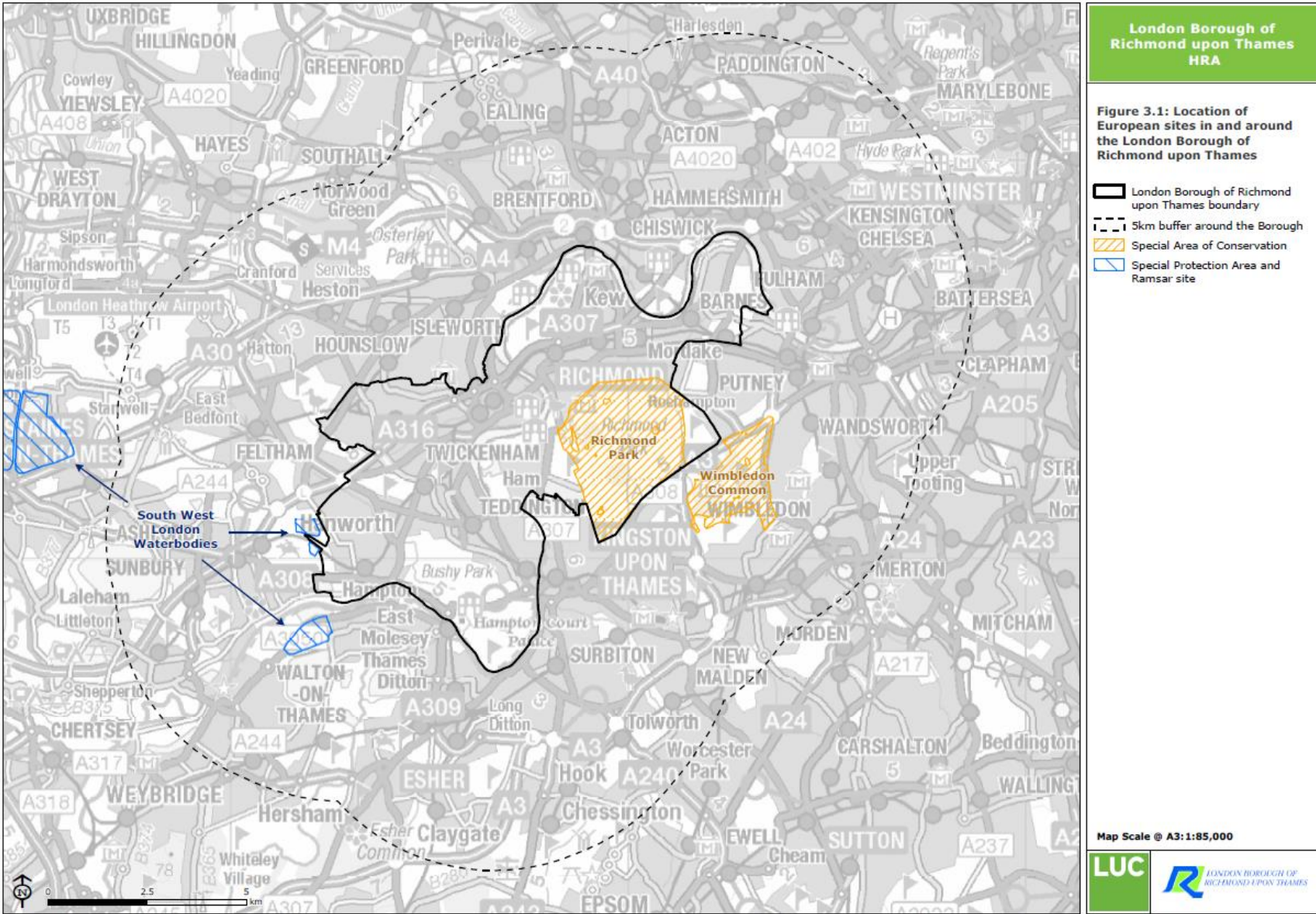
- 3.1 HRA Screening of the Publication Local Plan (2016) has been undertaken in line with current available guidance and seeks to meet the requirements of the Habitats Regulations. The tasks that have been undertaken during the screening stage of the HRA are described in detail below.

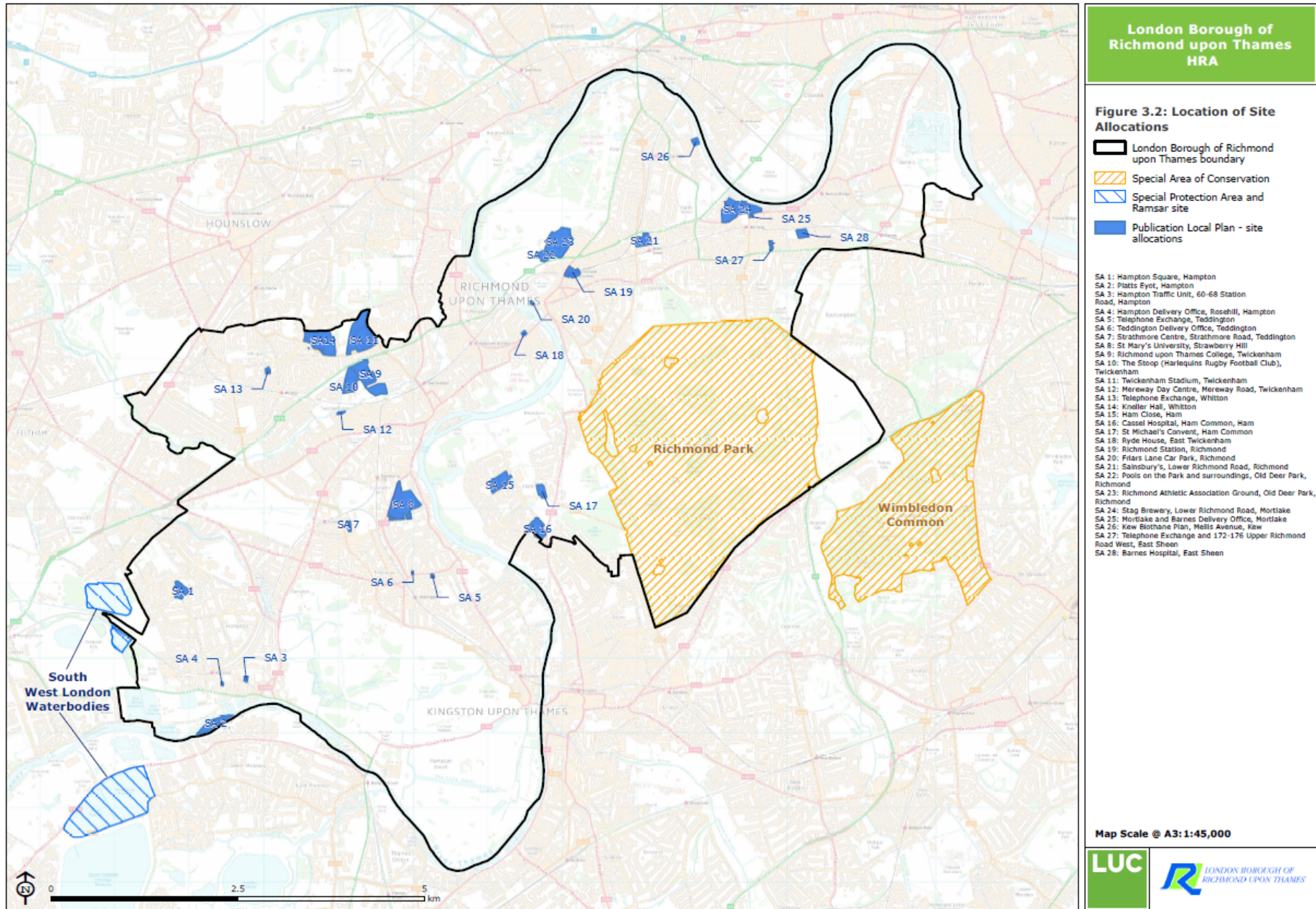
Identification of European sites which may be affected by the Publication Local Plan and the factors contributing to and defining the integrity of these sites

- 3.2 During the HRA of the Site Allocations DPD, an initial investigation was undertaken to identify European sites within or adjacent to the LBRuT boundary which may be affected by development. This involved the use of GIS data to map the locations and boundaries of European sites using publicly available data from Natural England.
- 3.3 All European sites lying partially or wholly within 5km from the borough boundary were included in the HRA, in order to address the fact that proposals in the Site Allocations DPD may affect European sites which are located outside the administrative boundary of the borough. The same approach has been taken for this HRA of the Publication Local Plan. This distance was used in the HRA for the Core Strategy¹⁴ which was supported by Natural England and is considered reasonable to ensure that all designated sites that could potentially be affected by development in LBRuT are identified and included in the assessment.
- 3.4 For some local authorities there is the possibility that sites beyond the 5km distance could be affected by development within the district or borough in question, for example where the water resources used to supply the district come from a source that lies further afield and which is subject to European designation. Therefore, where information gathered during the HRA indicates that other European sites could be affected they should be considered in the assessment as appropriate.
- 3.5 One European site (Richmond Park SAC) is located within the LBRuT boundary, while Wimbledon Common SAC lies just less than 500m from the east of the borough. There is one further European site within 5km, South West London Waterbodies SPA, as shown in **Figure 3.1** overleaf. **Figure 3.2** also shows the location of the proposed site allocations in relation the European sites.
- 3.6 Consideration was given to whether the Thames Basin Heaths SPA should be included in the HRA due to the significant pressure the SPA is under from development in the 11 local authorities surrounding the SPA. However, LBRuT is not one of the 11 local authorities immediately bordering the SPA (which lies approximately 11km from the LBRuT at the closest point). LBRuT is therefore not one of the local authorities that has had to implement mitigation measures under the Thames Basin Heaths Delivery Plan originally developed by Natural England in consultation with the 11 local authorities surrounding the SPA. Significant work was undertaken to develop a strategy that would enable the residential development required in the 11 local authorities without significantly affecting the three qualifying bird species of the SPA. Natural England recommended an approach based on two forms of mitigation:
- The provision of Suitable Alternative Natural Greenspace (SANG) or alternative public recreation areas at an agreed standard of eight hectares per 1000 new residents.
 - The delivery of Strategic Access Management and Monitoring Measures (SAMM), to be funded by developer contributions.

¹⁴ Assessment of likely significant effect (<http://www.richmond.gov.uk/finalreportsept07-2.pdf>)

- 3.7 Natural England also recommended that no new housing should be built in an 'exclusion zone' (land within 400 metres of the SPA). The research undertaken to support the original Delivery Plan concluded that any increase in population within 5km of the designated site may have an impact on the recreational use of the SPA. For this reason, it is considered unlikely that development arising from LBRuT's Publication Local Plan would have a significant effect on the Thames Basin Heaths SPA and it has not been included in this HRA.





- 3.8 The attributes of these sites which contribute to and define their integrity have been summarised below and described in more detail in **Appendix 1**, with reference to the Standard Data Forms for SACs and SPAs¹⁵:
- **Richmond Park SAC** – designated for the presence of the stag beetle *Lucanus cervus*. This site is located within the eastern part of the LBRuT. The fact that this site is surrounded by urban development means that it is vulnerable to high levels of recreation pressure¹⁶.
 - **Wimbledon Common SAC** – designated for the presence of two Annex 1 habitats, Northern Atlantic wet heaths and European dry heaths, as well as the stag beetle *Lucanus cervus*. This site is located just outside the eastern border of LBRuT in very close proximity to Richmond Park. Again, the fact that this site is surrounded by urban development means that it is vulnerable to high levels of recreation pressure¹⁷.
 - **South West London Waterbodies SPA** – designated for two bird species which the site regularly supports over winter – *Anas clypeata* (the northern shoveler) and *Anas strepera* (the gadwall). The site is fragmented, with fragments being located adjacent to the south west of the LBRuT. The qualifying features of this site are vulnerable to disturbance from recreation and there is also an issue surrounding the potential future decommissioning of reservoirs once they are no longer required for the purposes of water supply, as well as the potential impacts of maintenance works¹⁸.
- 3.9 This analysis enabled European site interest features to be identified, along with the features of each site which determine site integrity and the specific sensitivities of the site. This information has been used in the assessment of how the potential impacts of the Publication Local Plan may affect the integrity of each site.

Assessment of 'likely significant effects' of the Publication Local Plan

- 3.10 As required under Regulation 102 of the Conservation of Habitats and Species Regulations 2010¹⁹ (the 'Habitats Regulations'), an assessment has been undertaken of the 'likely significant effects' of the Publication version of the Local Plan. A screening matrix was prepared in order to identify which site allocations would be likely to have a significant effect on European sites in and around the LBRuT, without taking mitigation into account. Within the matrix, consideration was given to the potential for the development proposed at each site to result in significant effects associated with:
- physical loss of/damage to habitat;
 - non-physical disturbance e.g. noise/vibration or light pollution;
 - air pollution;
 - increased recreation pressure; and
 - changes to hydrological regimes.
- 3.11 The detailed screening matrix can be found in **Appendix 3** of this report and the findings are described in more detail in **Chapter 4**, where the potential to mitigate the possible significant effects identified is also explained.
- 3.12 This approach allowed for consideration to be given to the cumulative impacts of the site allocations as well as simply focussing on each site individually.
- 3.13 A risk-based approach involving the application of the precautionary principle was adopted in the assessment, such that a conclusion of 'no significant effect' was only reached where it was considered very unlikely, based on current knowledge and the information available, that a

¹⁵ These were obtained from the Joint Nature conservation Committee and Natural England websites (www.jncc.gov.uk and www.naturalengland.org.uk)

¹⁶ Richmond Park SAC, Natura 2000 Data Form, JNCC 27/07/2011

¹⁷ Wimbledon Common SAC, Natura 2000 Data Form, JNCC 27/07/2011

¹⁸ South West London Waterbodies SPA, Natura 2000 Data Form, JNCC 05/05/2006

¹⁹ SI No. 2010/490

proposal in the Publication Local Plan would have a significant effect on the integrity of a European site.

- 3.14 A 'traffic light' approach has been 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.

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).

Interpretation of 'likely significant effect'

- 3.15 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.
- 3.16 In the Waddensee case²⁰, the European Court of Justice 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).
- 3.17 A relevant opinion delivered to the Court of Justice of the European Union²¹ 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."
- 3.18 This opinion (the 'Sweetman' case) therefore allows for the authorisation of plans and projects whose possible effects, alone or in combination, can be considered 'trivial' or *de minimus*; referring to such cases as those "*that have no appreciable effect on the site*". In practice such effects could be screened out as having no likely significant effect; they would be 'insignificant'.

Mitigation provided by the Local Plan

- 3.19 Some of the potential effects identified could be mitigated through the implementation of policies within the Local Plan itself. These include policies relating to the provision of improved sustainable transport links which could help to mitigate potential increases in air pollution associated with increased vehicle traffic, and the provision of green infrastructure within new developments which may help to relieve increases in visitor pressure at European sites. There are also policies with the specific purpose of protecting and site allocation proposals may also provide some mitigation of effects, in particular the proposals for improvements at stations within the borough, which may help to encourage sustainable transport and reduce air pollution.
- 3.20 This potential mitigation has been taken into consideration during the screening process and has influenced the screening assumptions set out below and screening conclusions (see **Chapter 4**).

²⁰ ECJ Case C-127/02 "Waddensee" Jan 2004.

²¹ Advocate General's Opinion to CJEU in Case C-258/11 Sweetman and others v An Bord Pleanala 22nd Nov 2012.

Where it has been possible to conclude that there would be no likely significant effects taking into account mitigation, then there is no need to carry out Appropriate Assessment.

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

- 3.21 The screening stage of the HRA has taken the approach of screening each Local Plan policy individually, which is consistent with current guidance. The site allocations has also been screened in this way, which builds on the previous HRA work carried out for the Site Allocations DPD. 'Key Office Areas', 'Industrial Estates and Business Parks, and 'Other Open Land of Townscape Importance' have been screened out of the site allocations assessment as they will not result in new development. Instead, those designations are intended to safeguard existing sites.
- 3.22 For some types of impacts, screening for likely significant effects has been determined on a proximity basis, using GIS data to determine the proximity of potential development locations to the European sites that are the subject of the assessment. However, there are many uncertainties associated with using set distances as there are very few standards available as a guide to how far impacts will travel. Therefore, during the screening stage a number of assumptions have been applied in relation to assessing the likely significant effects on European sites that may result from the Local Plan, as explained below. These assumptions draw from the information gathered during the HRA screening of the Core Strategy, Draft Management Plan, and Site Allocations DPD as appropriate, as well as the conclusions of that work.

Physical loss of or damage to habitat

- 3.23 Physical damage to habitats can occur as a result of the construction of new development. Any of the different types of new development in the Publication Local Plan could potentially result in this effect, depending on the location.
- 3.24 Any development resulting from the Publication Local Plan would be located within the boundary of the LBRuT; therefore loss of or damage to habitat from within the boundaries of European sites that lie outside of the borough can be ruled out. This is the case for Wimbledon Common SAC and South West London Waterbodies SPA.
- 3.25 Habitat loss or damage within the boundary of Richmond Park SAC could occur if development were to be proposed in that area of the borough. However, this is very unlikely as Policy LP15 Biodiversity provides mitigation for physical loss of or damage to habitats by protecting SSSIs and therefore the SPA and SACs. In addition, none of the sites allocated in the Publication Local Plan lie within the SAC, with the closest being SA 17 St Michael's Convent which lies approximately 800m outside of the SAC at the nearest point. Some of the Local Plan policies allow for development outside of the allocated sites and could therefore, in theory result in development within Richmond Park SAC. However, as noted above, Policy LP15 would ensure that this did not take place.
- 3.26 However, loss of or damage to habitat outside of the boundaries of a European site could still affect the integrity of that site if it occurs within an area used for offsite breeding, foraging or roosting by the qualifying species of the European site. The qualifying heathland habitats of Wimbledon Common SAC are not transient species so would not be affected in this way by development outside of the SAC. The stag beetle is a qualifying feature of both Wimbledon Common and Richmond Park SAC and may travel outside of the SAC boundary, although it is unlikely that they will travel far outside of the SAC (it is generally only the male stag beetle that flies during the summer months, and the female beetle rarely flies).²² The preferred habitat for stag beetles is old, established woodland, and the larvae feed on rotting tree matter.¹⁶ As the beetle larvae take years to develop, they have been vulnerable to tree clearance and the 'tidying up' of wood in parks and especially gardens.²³ The Royal Parks' management plans for Richmond Park include the retention of suitable dead wood to help encourage stag beetles to settle.¹⁶

²² <https://www.royalparcs.org.uk/parks/richmond-park/richmond-park-attractions/wildlife/stag-beetles>

²³ <http://www.arkive.org/stag-beetle/lucanus-cervus/>

- 3.27 Data obtained from GiGL²⁴ shows the locations of recorded sightings of stag beetles throughout the borough, although the geographical accuracy of the GiGL data varies – in some cases the point locations mapped just mean that stag beetles have been recorded nearby within a grid square of varying sizes. However, it does show that there have been sightings recorded in or near six²⁵ of the sites that are allocated in the Publication Local Plan and that the locations where stag beetles have been recorded are distributed across the borough and not just in the vicinity of the SAC. The GiGL website explains that many recorded sightings are provided by members of the public, and for stag beetles, the sightings are mostly in back gardens of houses, where rotting wood and tree matter may be present.
- 3.28 Research²⁶ 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. Three of the allocated sites are within 2km of Richmond Park SAC and have stag beetle records associated with them: SA 17 St Michael's Convent, SA 19 Richmond Station, and SA 26 Telephone Exchange East Sheen.
- 3.29 However, even if all of the allocated sites within 2km of the Richmond Park SAC were developed and there was a cumulative loss of rotting tree matter at those locations, it is not considered likely that this would cause a significant effect on the SAC population due to the large number of other locations within 2km at which stag beetles have been recorded. In addition, the provision of suitable habitat for stag beetles within the SAC (as part of the Royal Parks' management plan) will help to support the SAC population.
- 3.30 The qualifying bird species of South West London Waterbodies SPA could also travel offsite; however GiGL data does not show either the gadwall or northern shoveler as being observed at any of the allocated sites.
- 3.31 Northern shoveler and gadwall predominantly use open water and wetland habitats, although they occasionally breed away from the water if there is no suitable habitat nearby²⁷. As the SPA provides a range of habitats, it is assumed that only sites with significant wetland habitats or those very close to the SPA site could support offsite habitats used by South West London Waterbodies SPA species. Records of gadwall and northern shoveler within the LBRuT are largely associated with ponds and reservoirs throughout the borough but particularly within Richmond Park SAC and Bushy Park. None of these locations is allocated for new development, and none of the allocated sites support significant wetland habitats.
- 3.32 **Physical loss of or damage to habitats within the European sites and their offsite habitats can therefore be screened out of further assessment for all of the European sites.**

Non-physical disturbance: noise, vibration and light pollution

- 3.33 Noise and vibration effects can occur during the construction and operation of new development and could result from any of the types of development proposed in the Publication Local Plan. Such effects are most likely to disturb bird species (out of the qualifying features relevant to LBRuT) and are thus a key consideration with respect to European sites where birds are the qualifying features, although noise and vibration may also affect other species. Using a precautionary approach, we have assumed that the effects of noise, vibration and light are most likely to be significant if development takes place within 500 metres of a European site with qualifying features sensitive to these disturbances, or mapped off-site breeding, foraging or roosting areas.
- 3.34 There are no site allocation options within 500m of Wimbledon Common SAC, Richmond Park SAC or South West London Waterbodies SPA. There are, however, a number of site allocations within 500m of areas where stag beetles, gadwall and northern shoveler sightings have been recorded in the past. However, these locations are not known to be important off-site breeding, foraging or roosting areas that could affect the integrity of the European sites, and as noted above, stag

²⁴ Greenspace Information for Greater London: the capital's environmental record centre. Data obtained 14 November 2016

²⁵ SA2 Platts Eyot, SA8 St Mary's University Strawberry Hill, SA9 Richmond College, SA17 St Michael's Convent, SA19 Richmond Station, SA25 Telephone Exchange East Sheen

²⁶ <http://onlinelibrary.wiley.com/doi/10.1111/j.1469-7998.2006.00282.x/abstract>

²⁷ <http://www.birdlife.org/datazone>

beetle in particular have been recorded across most of the borough. Gadwall and northern shoveler have been recorded more sparsely but still across the full extent of the borough. Four site allocations²⁸ are within 500m of gadwall or northern shoveler records.

- 3.35 The effects of the proposed site allocations and any other development outside of the allocations (either individually or cumulatively) on stag beetle, gadwall and northern shoveler populations as a result of increased noise are unlikely to be significant even where development occurs within 500m, as the urban nature of the LBRuT means that a significant amount of noise and vibration from urban activities and vehicle traffic already exists.
- 3.36 Artificial lighting at night (e.g. from street lamps, flood lighting and security lights) is most likely to affect nocturnal species e.g. bats, and therefore have an adverse effect on the integrity of European sites where nocturnal species are a qualifying feature. Adult male stag beetles do fly around dusk during May-August²⁹, but although they can be attracted by light it is not known to be a significant factor in stag beetle mortality. As noted above, the most commonly referred to threat to stag beetles is tree clearance and the 'tidying up' of wood in parks and especially gardens. The qualifying bird species of South West London Waterbodies are not nocturnal, and the qualifying heathland habitats of Wimbledon Common SAC are not vulnerable to increases in light pollution. The urban nature of the LBRuT also means that a significant amount of light pollution from buildings and street lighting already exists in the borough.
- 3.37 In addition, some of the policies within the Publication Local Plan will help to reduce the risk of noise, vibration and light pollution associated with development: Policies LP 9 Floodlighting; LP 10 Local environmental impacts, pollution and land contamination; and LP 22 Sustainable design and construction all seek to minimise the environmental impacts of development.
- 3.38 **Therefore non-physical disturbance from noise, vibration and light pollution can be screened out of further assessment in relation to all of the European sites.**

Air pollution

- 3.39 Air pollution associated with increased vehicle traffic could result from any of the development proposed in the Publication Local Plan, although residential and employment/commercial developments are likely to generate the highest number of additional vehicle journeys.
- 3.40 Air pollution is most likely to affect European sites where plant, soil and water habitats are the qualifying features, but some qualifying animal species may also be affected, either directly or indirectly, by any deterioration in habitat as a result of air pollution. Deposition of pollutants to the ground and vegetation can alter the characteristics of the soil, affecting the pH and nitrogen availability that can then affect plant health, productivity and species composition.
- 3.41 In terms of vehicle traffic, nitrogen oxides (NO_x, i.e. NO and NO₂) are considered to be the key pollutants. Deposition of nitrogen compounds may lead to both soil and freshwater acidification, and NO_x can cause eutrophication of soils and water.
- 3.42 The qualifying heathland habitats of Wimbledon Common SAC are known to be particularly vulnerable to increases in air pollution³⁰. The qualifying stag beetle at Richmond Park SAC and the bird species of South West London Waterbodies are not directly vulnerable to air pollution although it is possible that they may be indirectly affected as a result of changes to their supporting habitats associated with increased pollution.
- 3.43 Based on the Highways Agency Design for Road and Bridges (DMRB) Manual Volume 11, Section 3, Part 1³¹ (which was produced to provide advice regarding the design, assessment and operation of trunk roads (including motorways)), it is assumed that air pollution from roads is unlikely to be significant beyond 200m from the road itself. Where increases in traffic volumes are forecast, this 200m buffer needs to be applied to the relevant roads in order to make a judgement about the likely geographical extent of air pollution impacts. The A308 runs within close proximity of the eastern boundary of Richmond Park SAC, within around 50m at some

²⁸ SA20 Friars Lane Car Park, SA18 Ryde House, SA4 Hampton Delivery Office, and SA2 Platts Eyot.

²⁹ <http://www.ypte.org.uk/animal/beetle-stag-/53>

³⁰ Wimbledon Common SAC Site Improvement Plan: <http://publications.naturalengland.org.uk/publication/5638512552443904>

³¹ *Design Manual for Road and Bridges*. Highways Agency. <http://dft.gov.uk/ha/standards/dmrb/index.htm>

points. The A3 runs adjacent to the north western boundary of Wimbledon Common SAC, and there are strategic roads (the A3050) within close proximity of South West London Waterbodies SPA. Therefore, all three sites could potentially experience significant effects as a result of increases in traffic along those routes.

- 3.44 No traffic forecast data is currently available for the LBRuT or therefore for the above roads specifically. However, the A3 (close to Wimbledon Common SAC) currently fails annual mean objectives for NO₂³². The A308 and A3050 do not currently fail annual NO₂ objectives, but could in the future if traffic flows along them increased.
- 3.45 Taking a precautionary approach in the absence of future traffic data, it is assumed that development within the borough has the potential to increase air pollution and could therefore impact upon European sites. **Air pollution impacts therefore remain screened in to further assessment for all sites, at this stage.**

Impacts of recreation

- 3.46 Recreation activities and general human presence can have an adverse impact on the integrity of a European site as a result of physical disturbance, e.g. through erosion and trampling or disturbance to qualifying species. Residential and leisure-related development is particularly likely to result in an increase in recreation pressure. Employment development is less likely to result in such effects although some increases in recreation pressure may still occur, for example if European sites are visited by employees during lunchtimes. Retail-related development and the development of transport infrastructure are not considered likely to result in increased recreation pressure at European sites.
- 3.47 Richmond Park SAC may be most likely to be affected by increased recreation pressure as it is located within the borough within fairly close proximity to a number of site allocations – the closest is SA 17 St Michael's Convent, c.770m away, which is proposed for social and community infrastructure uses or residential redevelopment. The SAC is known to be a popular destination for recreation activities and the Publication Local Plan acknowledges that the park is one of the green spaces in the borough that is already experiencing visitor pressure that may be exacerbated by further residential development. There are already a few million visitors to the park, annually³³, and the Local Plan will provide up to 4,725 new homes in the borough, during the plan period. The increase in population (c.10,915 people, based on an average household size of 2.31³⁴) represents a small percentage increase in the number of visits, but could noticeably increase visits in combination with development in neighbouring boroughs. However, an increase in visitors is unlikely to affect stag beetles – the qualifying feature of the SAC – as the main factor affecting them is the availability of dead and rotting wood. This is altered through habitat management and not significantly affected by visitor pressure.
- 3.48 While Wimbledon Common SAC is also a popular destination for recreation activities, and also includes the stag beetle as a qualifying feature along with heathland habitats that are also vulnerable to increases in visitor numbers, the distance of that site from the LBRuT and the fact that the A3 acts as a barrier between the SAC and the borough means that it is less easily accessible for LBRuT residents. It is therefore less likely to be a popular location for dog walkers, runners etc. from within the LBRuT and a significant increase in visitor numbers as a result of the Publication Local Plan is not considered likely.
- 3.49 The qualifying bird species of the South West London Waterbodies SPA could be vulnerable to disturbance as a result of increased recreation pressure. However, the fragments of the SPA that are closest to the LBRuT (Kempton Reservoirs and Knight and Bessborough Reservoirs) do not have open public access. Other fragments of the SPA lie further from the LBRuT and so are unlikely to experience a significant increase in recreation-related visits. Therefore, significant effects on the SPA are also not considered likely to result from the implementation of the Publication Local Plan.

³² <http://www.londonair.org.uk/london/asp/annualmaps.asp>

³³ Visitor numbers - https://www.royalparks.org.uk/__data/assets/pdf_file/0019/41815/report-august-2008-1.pdf; Visitor profile - https://www.royalparks.org.uk/__data/assets/pdf_file/0004/53356/Richmond-Park.pdf

³⁴ Based on 2011 census data

3.50 Local Plan policy LP 31: Public Open Space, Play Space, Sport and Recreation also encourages new development to provide open space, and could therefore provide mitigation for recreational pressure impacts elsewhere.

3.51 Impacts relating to recreational pressure can therefore be screened out of further assessment, for all European sites.

Water quantity and quality

3.52 The development that will be delivered through the Publication Local Plan could combine to increase demand for water abstraction and treatment, which could affect the integrity of European sites as a result of changes to hydrological regimes. Residential development is likely to result in the most significant increases in demand for water abstraction and treatment, although employment development is also likely to contribute to increases.

3.53 The heathland habitats of Wimbledon Common SAC are directly vulnerable to changes in water quality and quantity, and while the qualifying beetle and bird species of Richmond Common SAC and South West London Waterbodies SPA are not directly vulnerable, changes in hydrology could affect the habitats that support those species.

3.54 The European sites within and around LBRuT are unlikely to be significantly affected in this way as the provision of housing in LBRuT will largely be achieved through the redevelopment of existing urban areas and will therefore utilise existing infrastructure, including foul water and surface drainage facilities.

3.55 In addition, Thames Water's extensive sewer upgrading project, the Thames Tideway Tunnel, will also help to accommodate population growth across London, including in the LBRuT, by tackling the problems caused by overflow from the city's Victorian system of sewers.

3.56 There are also established regulatory mechanisms over the treatment of waste water (regulated by the Environment Agency) that take into account environmental impacts including likely significant effects on European sites, which should provide safeguards to ensure no adverse effects on integrity arise.

3.57 While Thames Water forecasts that demand for water will increase significantly over its water resources planning period, and that water deficiencies may be an issue across London, its Water Resources Management Plan³⁵ includes a number of measures to increase water supply such as wastewater re-use and some minor groundwater development.

3.58 On the basis of the above, water quantity and quality impacts can be screened out of further assessment, for all European sites.

Identification of other plans and projects which may have 'in-combination' effects

3.59 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".

3.60 The first stage in identifying 'in-combination' effects involves identifying which other plans and projects in addition to the LBRuT Local Plan may affect the European sites that were the focus of this assessment. There are a large number of potentially relevant plans and projects which could be considered; therefore the review at this stage focused on planned spatial growth within the authorities adjacent to or near the LBRuT. **Appendix 2** lists the plans that were reviewed, outlining the components of each plan that could have an impact on nearby European sites and considering the findings of the accompanying HRA work (where available).

³⁵ Thames Water Final Water Resources Management Plan 2015 - 2040 Main Report: <http://www.thameswater.co.uk/about-us/5372.htm>

- 3.61 The purpose of the review of other plans was to identify any components that could have an impact on the European sites within and around LBRuT that could also be significant affected by the Publication Local Plan, e.g. proposals for development near to these sites which could have implications in terms of increased traffic, water use and recreation pressures and infrastructure development. The potential for the effects of these plans to combine with the effects of the Local Plan has been considered in the next chapter and will continue to be assessed where necessary during further iterations of the HRA.

4 HRA Screening Assessment of the Publication Local Plan

- 4.1 This chapter describes the findings of the screening exercise that has been undertaken for the Publication Local Plan. The detailed screening matrix showing which of the policies and site allocations may have significant effects on European sites can be found in **Appendix 3**. The final column of the screening matrix provides the screening conclusion for each policy and site allocation.

Significant effects likely

- 4.2 **None of the policies or site allocations** in the Publication Local Plan are considered **likely** to result in significant effects on the European sites in and around London Borough of Richmond upon Thames.

Significant effects unlikely

- 4.3 Significant effects are considered **unlikely** in relation to **most of the Publication Local Plan policies**. The following 36 policies are screened out because they will not result directly in development (i.e. they set out criteria for development that will be determined under other more specific policies, which have been screened separately for their impacts on European sites):

- LP 1: Local Character and Design Quality
- LP 2: Building Heights
- LP 3: Designated Heritage Assets
- LP 4: Non-Designated Heritage Assets
- LP 5: Views and Vistas
- LP 6: Royal Botanic Gardens, Kew World Heritage Site
- LP 7: Archaeology
- LP 8: Amenity and Living Conditions
- LP 9: Floodlighting
- LP 10: Local Environmental Impacts, Pollution and Land Contamination
- LP 11: Subterranean Developments and Basements
- LP 12: Green Infrastructure
- LP 15: Biodiversity
- LP 16: Trees, Woodlands and Landscape
- LP 17: Green Roofs and Walls
- LP 18: River Corridors
- LP 19: Moorings and Floating Structures
- LP 20: Climate Change Adaptation
- LP 21: Flood Risk and Sustainable Drainage
- LP 22: Sustainable Design and Construction

- LP 24: Waste Management
- LP 25: Development in Centres
- LP 26: Retail Frontages
- LP 27: Local Shops, Services and Public Houses
- LP 30: Health and Wellbeing
- LP 31: Public Open Space, Play Space, Sport and Recreation
- LP 32: Allotments and Food Growing Spaces
- LP 33: Telecommunications
- LP 35: Housing Mix and Standards
- LP 36: Affordable Housing
- LP 38: Loss of Housing
- LP 41: Offices
- LP 44: Facilitating Sustainable Travel Choices
- LP 45: Parking Standards and Servicing
- SA 22: Pools on the Park and surroundings, Old Deer Park, Richmond
- SA 23: Richmond Athletic Association Ground, Old Deer Park, Richmond

4.4 The following policies and all of the site allocations will not result in significant effects, as the scale of development proposed is likely to be small (ie unlikely to contribute to a significant increase in vehicle emissions, when considered on its own) and/or of a type that would not affect the qualifying features of the European sites (ie relating to particular types of impacts that have been screened out – see **Chapter 3**):

- LP 13: Green Belt, Metropolitan Open Land and Local Green Space
- LP 14: Other Open Land of Townscape Importance
- LP 23: Water Resources and Infrastructure
- LP 37: Housing Needs of Different Groups
- LP 39: Infill, Backland and Backgarden Development
- LP 43: Visitor Economy
- SA 1: Hampton Square, Hampton
- SA 2: Platts Eyot, Hampton
- SA 3: Hampton Traffic Unit, 60-68 Station Road, Hampton
- SA 4: Hampton Delivery Office, Rosehill, Hampton
- SA 5: Telephone Exchange, Teddington
- SA 6: Teddington Delivery Office, Teddington
- SA 7: Strathmore Centre, Strathmore Road, Teddington
- SA 8: St Mary's University, Strawberry Hill
- SA 9: Richmond upon Thames College, Twickenham
- SA 10: The Stoop (Harlequins Rugby Football Club), Twickenham
- SA 11: Twickenham Stadium, Twickenham
- SA 12: Mereway Day Centre, Mereway Road, Twickenham
- SA 13: Telephone Exchange, Whitton
- SA 14: Kneller Hall, Whitton

- SA 15: Ham Close, Ham
- SA 16: Cassel Hospital, Ham Common, Ham
- SA 17: St Michael's Convent, Ham Common
- SA 18: Ryde House, East Twickenham
- SA 19: Richmond Station, Richmond
- SA 20: Friars Lane Car Park, Richmond
- SA 21: Sainsbury's, Lower Richmond Road, Richmond
- SA 24: Stag Brewery, Lower Richmond Road, Mortlake
- SA 25: Mortlake and Barnes Delivery Office, Mortlake
- SA 26: Kew Biothane Plan, Mellis Avenue, Kew
- SA 27: Telephone Exchange and 172-176 Upper Richmond Road West, East Sheen
- SA 28: Barnes Hospital, East Sheen

4.5 In the case of the allocated sites, although they have the potential to contribute to air pollution in-combination, the overall quantum of development in the borough has been assessed in relation to the overarching policies; see below.

Significant effects uncertain

4.6 For a number of the Publication Local Plan proposals it was concluded that there **may** be a significant effect on one or more European sites, **although this is uncertain**:

- LP 28: Social and Community Infrastructure
- LP 29: Education and Training
- LP 34: New Housing
- LP 40: Employment and Local Economy
- LP 42: Industrial Land and Business Parks

4.7 This is because no traffic forecast data is currently available for the LBRuT Local Plan, and it is not possible to anticipate the increase in vehicle emissions that is likely to arise from amount of development provided for in these Local Plan policies. Therefore, in line with the precautionary approach being applied in the HRA, as it is uncertain whether air pollution could have a significant effects then it has to be concluded that there will be likely significant effects, in relation to air pollution, and Appropriate Assessment is required to determine whether there would be an adverse effect on integrity for the three European sites. The Appropriate Assessment stage is described in the next chapter.

5 Appropriate Assessment

Appropriate Assessment approach

- 5.1 Following the screening stage, if likely significant effects on European sites are unable to be ruled out, the plan-making authority is required under Regulation 102 of the Habitats Regulations 2010 to make an 'Appropriate Assessment' of the implications of the plan for European sites, in view of their conservation objectives. EC Guidance³⁶ states that the Appropriate Assessment should consider the impacts of the plan (either alone or in combination with other projects or plans) on the integrity of European sites with respect to their conservation objectives and to their structure and function.
- 5.2 A site's integrity depends on it being able to sustain its 'qualifying features' (i.e. those Annex 1 habitats, Annex II species, and Annex 1 bird populations for which it has been designated) and to ensure their continued viability. A high degree of integrity is considered to exist where the potential to meet a site's conservation objectives is realised and where the site is capable of self-repair and renewal with a minimum of external management support.
- 5.3 An Appropriate Assessment has therefore been undertaken for all of the European sites in within 5km of LBRuT where likely significant effects from the Publication Local Plan were identified (or were not able to be ruled out) during the screening stage, i.e. air pollution effects in relation to the following policies:
- LP 28: Social and Community Infrastructure
 - LP 29: Education and Training
 - LP 34: New Housing
 - LP 40: Employment and Local Economy
 - LP 42: Industrial Land and Business Parks
- 5.4 All of these policies could result in new development and contribute to an increase in traffic on the strategic road network, therefore increasing air pollution.
- 5.5 As described in **Chapter 1**, a conclusion needs to be reached as to whether or not a policy or site allocation in the Local Plan would adversely affect the integrity of a Natura 2000 site. As stated in the EC Guidance, assessing the effects on the site(s) integrity involves considering whether the predicted impacts of the Local Plan policies (either alone or in combination) have the potential to:
- Cause delays to the achievement of conservation objectives for the site.
 - Interrupt progress towards the achievement of conservation objectives for the site.
 - Disrupt those factors that help to maintain the favourable conditions of the site.
 - Interfere with the balance, distribution and density of key species that are the indicators of the favourable condition of the site.
 - Cause changes to the vital defining aspects (e.g. nutrient balance) that determine how the site functions as a habitat or ecosystem.
 - Change the dynamics of relationships that define the structure or function of the site (e.g. relationships between soil and water, or animals and plants).
 - Interfere with anticipated natural changes to the site.
 - Reduce the extent of key habitats or the population of key species.

³⁶ *Assessment of plans and projects significantly affecting European sites. Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC.* European Commission Environment DG, November 2001.

- Reduce the diversity of the site.
 - Result in disturbance that could affect the population, density or balance between key species.
 - Result in fragmentation.
 - Result in the loss of key features.
- 5.6 The conservation objectives for each European site (listed in **Appendix 1**) are generally to maintain the qualifying features in favourable condition. The Site Improvement Plans for each European site provide a high level overview of the issues (both current and predicted) affecting the condition of the qualifying features of the site(s) and outline the priority measures required to improve the condition of the features. These have been drawn on to help to understand what is needed to maintain the integrity of the European sites.
- 5.7 Where an uncertain likely significant effect was identified at the screening stage, the potential impacts have been set out below and judgements made (based on the information available) regarding whether the impact will have an adverse effect on the integrity of the European sites. Consideration has been given to the potential for mitigation measures to be implemented that could reduce the likelihood or severity of the potential impacts such that there would not be an adverse effect on the integrity of the site.

Air pollution

- 5.8 The overall scale of residential, employment and other types of development proposed through the Local Plan is likely to result in an increase in traffic on the road network in and around Richmond upon Thames. The A3 (close to Wimbledon Common SAC) currently fails annual mean objectives for NO₂³⁷. The A308 (close to Richmond Park SAC) and A3050 (close to the South West London Waterbodies SPA) do not currently fail annual NO₂ objectives, but could in the future if traffic flows along them increased.
- 5.9 The following Local Plan policies provide some mitigation for air pollution effects:
- LP 24 Waste Management: encourages developments to make use of the rail and waterway network to transport waste and could therefore contribute to mitigation for air pollution associated with vehicle emissions;
 - LP 44 Facilitating Sustainable Travel Choices: seeks to reduce the impact of development including in relation to congestion and air pollution. As such, it may contribute to mitigation for air pollution effects; and
 - LP 45 Parking Standards and Servicing: seeks to reduce the impact of car travel on the local environment by controlling parking provision. As such, it may contribute to mitigation for air pollution effects.
- 5.10 In addition, site allocation SA 19 Richmond Station will result in improvements to the station, which may encourage sustainable transport use and provide mitigation for air pollution impacts.
- 5.11 The Air Quality Strategy for London³⁸ also sets out a wide range of mitigation measures that will be implemented across the city, including in the LBRuT, to reduce the impacts of increased vehicle traffic. These measures include ongoing investment in public transport through schemes including tube upgrades and significant increases in cycling and walking infrastructure.
- 5.12 LBRuT is in the process of updating its Air Quality Action Plan (AQAP) for 2016, which is expected to be published in 2017, so its strategy is not currently available. However, the 2014 AQAP³⁹ included measures to reduce vehicle emissions such as:
- Promoting travel plans;
 - Improvements for pedestrians, cyclists and public transport users;
 - Implementing traffic management systems;

³⁷ <http://www.londonair.org.uk/london/asp/annualmaps.asp>

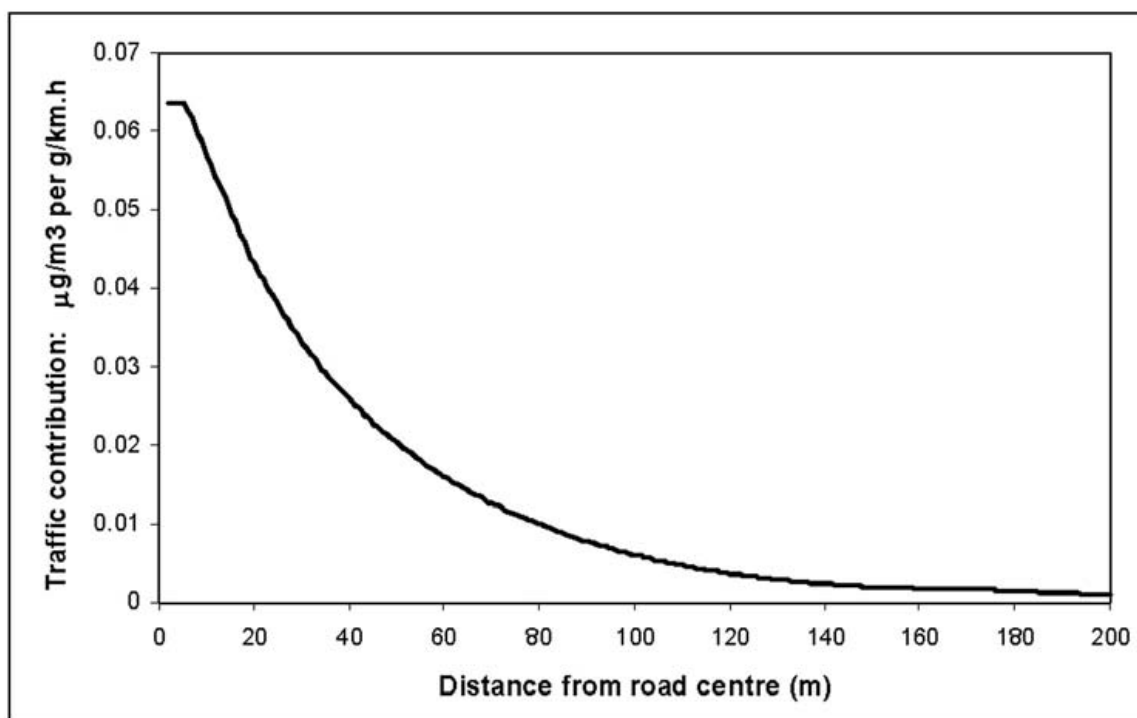
³⁸ <https://www.london.gov.uk/WHAT-WE-DO/environment/environment-publications/mayors-air-quality-strategy>

³⁹ http://www.richmond.gov.uk/air_quality_action_plan

- Refusing planning consent for activities that are likely to lead to a significant worsening of air pollution in 'hot spot' areas; and
- Parking controls.

- 5.13 The mitigation measures described will help to reduce air pollution associated with traffic; however, in the absence of future traffic data, a precautionary approach must be taken. It is therefore assumed that new development associated with the Publication Local Plan, either alone or in combination with development in neighbouring boroughs, will increase traffic flow on the roads adjacent to the European sites by greater than 1000 AADT (the point at which the DMRB considers that significant air pollution impacts could occur; as described in **Chapter 3**).
- 5.14 Although traffic flows along the A3, A308 and A3050 may increase, only a very small proportion of the European sites is within 200m of these roads:
- Richmond Park SAC: 3.2% within 200m of the A308;
 - Wimbledon Common SAC: 8.9% within 200m of the A3; and
 - South West London Waterbodies SPA: 3.2% within 200m of the A3050.
- 5.15 Furthermore, the effects of nitrogen deposition from traffic reduce dramatically with distance (see **Figure 5.1**), such that the 200 metre threshold is at the limit of where significant effects might occur. In practice, therefore, even if traffic flows increase significantly over the plan period, the effect on the qualifying features of European sites is likely to be negligible. **Therefore, 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.**

Figure 5.1 Traffic Contribution to Pollutant Concentration at Different Distances from the Road Centre⁴⁰



⁴⁰ Figure C1 from Design Manual for Roads and Bridges (May 2007) Volume 11 Environmental Assessment, Section 3 Environmental Assessment Techniques. Part 1 HA207/7 Air Quality

6 Conclusions

- 6.1 The HRA of the LBRuT Publication Local Plan has been undertaken in accordance with currently available guidance and based on a precautionary approach as required under the Habitats Regulations. 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.
- 6.2 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.

LUC
December 2016

Appendix 1

Attributes of European Sites included in the HRA

Site Name	Area (ha)	Location	Qualifying Features ⁴¹	Key vulnerabilities and environmental conditions to support site integrity ⁴²
Richmond Park SAC	846.27	Found in the south east of the borough adjacent to the boundary.	<p>Annex II species that are a primary reason for selection of this site 1083 Stag beetle <i>Lucanus cervus</i> Richmond Park has a large number of ancient trees with decaying timber. It is at the heart of the south London centre of distribution for stag beetle <i>Lucanus cervus</i>, and is a site of national importance for the conservation of the fauna of invertebrates associated with the decaying timber of ancient trees.</p>	No current issues affecting the Natura 2000 feature have been identified. Despite this, the Richmond Park Management Plan should continue to be periodically reviewed to ensure the continuing availability of decaying wood habitat.
Wimbledon Common SAC	351.38	Located outside of the borough, but adjacent to the south eastern edge of the LBRuT.	<p>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site 4010 Northern Atlantic wet heaths with <i>Erica tetralix</i> 4030 European dry heaths Annex II species that are a primary reason for selection of this site 1083 Stag beetle <i>Lucanus cervus</i> Wimbledon Common has a large number of old trees and much fallen decaying timber. It is at the heart of the south London centre of distribution for stag beetle <i>Lucanus cervus</i>. The site supports a number of other scarce invertebrate species associated with decaying timber.</p>	The site is located in an urban area and therefore experiences air pollution and heavy recreational pressure. According to Natural England's Site Improvement Plans, measures should be implemented by Natural England to establish a Site Nitrogen Action Plan. Furthermore, Natural England and Wimbledon and Putney Common Conservators should implement measures to reduce visitor impact. Issues associated with habitat fragmentation and invasive species have also been identified. The Species Recovery Programme should address this, while an invasives response plan should be developed.
South West London Waterbodies SPA	825.1	A fragmented site, with fragments being located outside of the borough, but adjacent to the south west boundary of the LBRuT.	Designated for two bird species which the site regularly supports over winter – <i>Anas clypeata</i> (the northern shoveler) and <i>Anas strepera</i> (the gadwall).	The qualifying features of this site are vulnerable to disturbance from recreation and there is also an issue surrounding the potential future decommissioning of reservoirs once they are no longer required for the purposes of water supply,

⁴¹ Information taken from JNCC standard data forms: Richmond Park SAC - <http://jncc.defra.gov.uk/protectedsites/sacselection/n2kforms/UK0030246.pdf>; Wimbledon Common SAC - <http://jncc.defra.gov.uk/protectedsites/sacselection/n2kforms/UK0030301.pdf>; and South West London Waterbodies SPA - <http://jncc.defra.gov.uk/pdf/SPA/UK9012171.pdf>

⁴² Information taken from Natural England's Site Improvement Plans: Richmond Park SAC - <http://publications.naturalengland.org.uk/publication/6625232836100096>; Wimbledon Common SAC - <http://publications.naturalengland.org.uk/publication/5638512552443904>; and South West London Waterbodies SPA - <http://publications.naturalengland.org.uk/publication/6662064386867200>

Site Name	Area (ha)	Location	Qualifying Features ⁴¹	Key vulnerabilities and environmental conditions to support site integrity ⁴²
				as well as the potential impacts of maintenance works ⁴³ .

⁴³ South West London Waterbodies SPA, Natura 2000 Data Form, JNCC 05/05/2006

Appendix 2

Plans, Policies and Programmes with the Potential for In-Combination Effects

Local Plans and Strategies

Wandsworth Local Plan Core Strategy (Adopted March 2016)

Housing

The Core Strategy makes provision for at least 25,850 net additional homes from conventional supply and 1,320 from non-self-contained accommodation between 2015/16 and 2029/30 (Core Policy PL 5).

Employment Land Provision

The Core Strategy (Core Policy PL 6) supports the delivery of employment sites through mixed-use developments. The Council identifies that 25,000 jobs could be delivered in Wandsworth as part of the Nine Elms Vauxhall Opportunity Area (PL 11).

HRA Findings

The April 2015 HRA Report for the Wandsworth Local Plan concluded that the policies in the Plan are not likely to have a significant effect on any European sites, and **therefore there are no likely in-combination effects with the LBRuT Publication Local Plan.**

London Borough of Hounslow Local Plan 2015 – 2030 (Adopted September 2015)

Housing

The Local Plan (Policy SC1) proposes the delivery of 12,330 homes between 2015 and 2030. Most of these new homes will be located in Brentford and Hounslow.

Employment Land Provision

The Council seek to consolidate Hounslow's major industrial and office sites, and to ensure that the supply chain opportunities created by Heathrow are retained within the borough. No overall target for the provision of employment sites is identified.

HRA Findings

The March 2014 HRA Report concludes that the development set out in the Hounslow Local Plan would not result in a likely significant effect on any European sites, and **therefore there are no likely in-combination effects with the LBRuT Publication Local Plan.**

Hammersmith and Fulham Local Plan (Proposed Submission September 2016)

Housing

The Local Plan makes provision for at least 22,200 homes between 2015 and 2035, in accordance with the London Plan (2016). Most of these homes will be located in the Regeneration Areas of White City and Fulham.

Employment Land Provision

The Local Plan supports the delivery of employment sites through mixed-use schemes, specifically those that utilise existing strengths in the borough including creative industries, health services, bio-medical and other research based industries (Policy E1). No overall target for the provision of employment sites is identified.

HRA Findings

The Sustainability Appraisal report for the adopted Core Strategy (2011) refers to the requirements of the Habitats Directive and concluded that there would be no significant effects on Richmond Park SAC (the only European site within fairly close proximity of the borough) as a result of the Core Strategy being implemented. Likewise, the SA report of the Development Management Local Plan (2013) did not consider that Richmond Park SAC would be significantly adversely impacted upon by any of the policies in the Local Plan. **Therefore, there are no likely in-combination effects with the LBRuT Publication Local Plan.**

Royal Borough of Kingston upon Thames Core Strategy (Adopted April 2012)

Housing

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.

Employment Land Provision

The Core Strategy supports the delivery of employment land, but no overall target for the provision of employment sites is identified.

HRA Findings

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 would not have any significant effects on European sites either alone or in combination with other plans and programmes. As a result, Appropriate Assessment was not required. **Therefore, there are no likely in-combination effects with the LBRuT Publication Local Plan.**

Spelthorne Borough Council Core Strategy and Policies (Adopted February 2009)

Note that the Council has recently commenced a review of the adopted Core Strategy. Consultation on Issues and Options for the new Plan, which was programmed for July/August 2016 has been rescheduled to take place in the Spring of 2017. Therefore, the figures set out below are likely to be superseded by the new Local Plan.

Housing

Policy SP2 states that the Council will ensure that provision is made for sufficient numbers of dwellings to meet the draft Regional Spatial Strategy for the South East requirement for Spelthorne (2,706 homes from 2009 to 2026) although the RSS has since been revoked.

Employment Land Provision

Policy SP3 states that the Council will maintain the employment capacity of the Spelthorne economy by maintaining well sited larger Employment Areas and supporting the renewal and improvement of employment floorspace to meet needs. No overall target for the provision of employment sites is identified.

HRA Findings

The Appropriate Assessment screening opinion concludes that the Spelthorne Development Plan–Core Strategy and Policies DPD and the Allocations DPD will have no significant effect on any European site and that any further appraisal to consider adverse impacts is not required. **Therefore, there are not likely to be in-combination effects with the LBRuT Publication Local Plan.**

Elmbridge Borough Council Local Plan Core Strategy (Adopted July 2011)

Housing

Policy CS2 states that the Council will plan for approximately 3,375 net additional dwellings (225 net dwellings annual average) within the borough between 2011 and 2026.

Employment Land Provision

The spatial strategy stated that economic growth will be focused within the borough's town centres, strategic employment sites and in close proximity to the variety of visitor attractions the borough has to offer. The Core Strategy protects existing employment sites and supports the delivery of new employment provision, but no overall target for the provision of employment sites is identified.

HRA Findings

The HRA report for the Core Strategy (March 2010) concluded that there would be no likely significant effects on most European sites as a result of the implementation of the Core Strategy, although in the case of the Thames Basin Heaths SPA mitigation would be necessary to avoid disturbance from recreation and urbanisation. The report details the mitigation that will be implemented (e.g. the provision of SANGS and the avoidance of residential development within 400m of the heaths) and taking this mitigation into account, it is concluded that likely significant effects on the SPA would be avoided. **Therefore, there are no likely in-**

combination effects with the LBRuT Publication Local Plan.

Merton Local Plan Core Strategy (adopted 2011)

Although the London Borough of Merton is not directly adjacent to the LBRuT, the boroughs are within very close proximity and therefore it is appropriate to include Merton in the review of potential in-combination effects.

Housing

Policy CS9 of the adopted Core Strategy seeks the provision of a minimum of 4,800 additional homes for the period 2011 – 2026, including:

- 1450 -1800 in Morden
- 1550 -1850 in Mitcham
- 500 - 600 in Colliers Wood and South Wimbledon
- 500 - 600 in Wimbledon
- 500 - 600 in Raynes Park

Employment Land Provision

Policy CS12 seeks to ensure that there is an adequate supply of viable and appropriate sites and premises for employment use, but no overall target for the provision of employment sites is identified.

HRA Findings

The June 2010 HRA Screening Report concludes that subsequent to the amendment of Policy CS 9 Housing Provision, none of the policies in the Core Strategy are likely to result in significant adverse impacts on European Sites. As a result, Appropriate Assessment was not required. **Therefore, there are no likely in-combination effects with the LBRuT Publication Local Plan.**

Appendix 3

Screening Matrix for the Publication Local Plan

The screening matrix below shows which types of impacts on European sites could potentially result from each of the policies and sites allocated in the Publication Local Plan. Where a site is not expected to have a particular type of impact, the relevant cell is shaded green. Where a site could potentially have a certain type of impact, this is shown in orange. The final column sets out the screening conclusions, taking into account mitigation provided by other policies in the Local Plan (or other plans and strategies) as explained in **Chapters 3 and 4**, and shown in the fifth column.

	Likely activities (operation) to result as a consequence of the proposal	Likely effects if proposal implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the proposal have likely significant effects on European sites (taking mitigation into account)?
Policies					
LP 1: Local Character and Design Quality	None – this policy will not result in new development.	n/a	n/a	n/a	n/a
LP 2: Building Heights	None – this policy will not result in new development.	n/a	n/a	n/a	n/a
LP 3: Designated Heritage Assets	None – this policy will not result in new development.	n/a	n/a	n/a	n/a
LP 4: Non-Designated Heritage Assets	None – this policy will not result in new development.	n/a	n/a	n/a	n/a
LP 5: Views and Vistas	None – this policy will not result in new development.	n/a	n/a	n/a	n/a
LP 6: Royal Botanic Gardens, Kew World Heritage Site	None – this policy will not result in new development.	n/a	n/a	n/a	n/a
LP 7: Archaeology	None – this policy will not result in new development.	n/a	n/a	n/a	n/a
LP 8: Amenity and Living Conditions	None – this policy will not result in new development.	n/a	n/a	While it includes some measures to minimise non-physical disturbance associated with new development, this is	n/a

	Likely activities (operation) to result as a consequence of the proposal	Likely effects if proposal implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the proposal have likely significant effects on European sites (taking mitigation into account)?
				with the aim of protecting amenity rather than ecological receptors.	
LP 9: Floodlighting	None – this policy will not result in new development.	n/a	n/a	This policy requires that impacts on biodiversity and wildlife are taken into consideration when assessing planning applications for floodlighting. The policy could therefore provide some mitigation for the effects of non-physical disturbance (lighting).	n/a
LP 10: Local Environmental Impacts, Pollution and Land Contamination	None – this policy will not result in new development.	n/a	n/a	This policy seeks to reduce air pollution, noise and vibration, light pollution and land contamination associated with development. Although designated ecological assets are not identified explicitly as receptors, the policy refers to environmental impacts generally	n/a

	Likely activities (operation) to result as a consequence of the proposal	Likely effects if proposal implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the proposal have likely significant effects on European sites (taking mitigation into account)?
				and provides mitigation for non-physical disturbance.	
LP 11: Subterranean developments and basements	None – this policy will not result in new development.	n/a	n/a	n/a	n/a
LP 12: Green Infrastructure	None – this policy will not result in new development.	n/a	n/a	This policy puts in place measures to protect the borough’s existing green infrastructure network and where possible enhance it. As such, it provides general mitigation from harm to all European sites. Although new or enhanced green infrastructure elsewhere in the borough could reduce recreational pressure on the European sites, the policy is unlikely to provide significant mitigation for this impact as the European sites in the borough are established important sites for	n/a

	Likely activities (operation) to result as a consequence of the proposal	Likely effects if proposal implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the proposal have likely significant effects on European sites (taking mitigation into account)?
				recreation.	
LP 13: Green Belt, Metropolitan Open Land and Local Green Space	Small scale appropriate development (public and private open spaces and playing fields, open recreation and sport, biodiversity including rivers and bodies of water and open community uses including allotments and cemeteries)	Physical loss of or damage to habitat Non-physical disturbance	Richmond Park SAC (onsite / offsite habitats) Wimbledon Common SAC (onsite / offsite habitats) South West London Waterbodies SPA (offsite habitats only)	The policy itself provides some mitigation in that development will only be permitted in 'exceptional' circumstances. Policy LP 15 Biodiversity provides mitigation by protecting SSSIs and therefore the SPA and SACs, with some additional protection provided by LP 12 Green infrastructure. Policies LP 9 Floodlighting; LP 10 Local environmental impacts, pollution and land contamination; and LP 22 Sustainable design and construction seek to minimise the environmental impacts of development and therefore provide	No – the scale of development coming forward through this policy is likely to be small and of a type that would not affect the qualifying features of the European sites. Policy LP 15 protects the European sites from development within their boundaries. Development could have an impact on habitats functionally connected to the European sites, however the areas primarily used by SPA bird species (gadwall and northern shoveler) are protected from development by Policy LP 15. There are sufficient records of stag beetle within 2km of Richmond Park SAC that the loss of some areas for development will not significantly affect the SAC population. The urban nature of LBRuT means that background levels of noise, vibration and light are already relatively high, such that the small amount of development that may occur within 500m of the European sites is unlikely to have a significant effect. Mitigation incorporated into the Local Plan further reduces this impact. Physical loss of or damage to

	Likely activities (operation) to result as a consequence of the proposal	Likely effects if proposal implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the proposal have likely significant effects on European sites (taking mitigation into account)?
				onsite or offsite habitat and non-physical disturbance can therefore be screened out of further assessment.	
LP 14: Other Open Land of Townscape Importance	Small scale development (linked to the functional use of open land, or replacement of, or minor extension to, existing built facilities)	Physical loss of or damage to habitat (offsite habitats only) Non-physical disturbance	Richmond Park SAC Wimbledon Common SAC South West London Waterbodies SPA	<p>The policy itself provides some mitigation as its aim is to safeguard open land and that development will only be permitted in 'exceptional' circumstances.</p> <p>Policy LP 15 Biodiversity provides mitigation by protecting SSSIs and therefore the SPA and SACs, with some additional protection provided by LP 12 Green infrastructure.</p> <p>Policies LP 9 Floodlighting; LP 10 Local environmental impacts, pollution and land contamination; and LP 22 Sustainable design and construction seek to</p>	<p>No – the scale of development coming forward through this policy is likely to be small and of a type that would not affect the qualifying features of the European sites.</p> <p>Policy LP 15 protects the European sites from development within their boundaries. Development could have an impact on habitats functionally connected to the European sites, however the areas primarily used by SPA bird species (gadwall and northern shoveler) are protected from development by Policy LP 15. There are sufficient records of stag beetle within 2km of Richmond Park SAC that the loss of some areas for development will not significantly affect the SAC population.</p> <p>The urban nature of LBRuT means that background levels of noise, vibration and light are already relatively high, such that the small amount of development that may occur within 500m of the European sites is unlikely to have a significant effect. Mitigation incorporated into the Local Plan further reduces this impact.</p>

	Likely activities (operation) to result as a consequence of the proposal	Likely effects if proposal implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the proposal have likely significant effects on European sites (taking mitigation into account)?
				minimise the environmental impacts of development and therefore provide mitigation.	Physical loss of or damage to onsite or offsite habitat and non-physical disturbance can therefore be screened out of further assessment.
LP 15: Biodiversity	None – this policy will not result in new development.	n/a	n/a	This policy seeks to protect biodiversity in the borough, including biodiversity in and adjacent to designated sites, as well as elsewhere, and supporting biodiversity enhancement. Although it does not identify European sites specifically as biodiversity assets, it does identify SSSIs, which incorporate the European sites, as being priorities for protection.	n/a
LP 16: Trees, Woodlands and Landscape	None – this policy will not result in new development.	n/a	n/a	n/a	n/a
LP 17: Green Roofs and Walls	None – this policy will not result in new development.	n/a	n/a	This policy encourages ecological enhancement within urban areas of the	n/a

	Likely activities (operation) to result as a consequence of the proposal	Likely effects if proposal implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the proposal have likely significant effects on European sites (taking mitigation into account)?
				borough and could therefore contribute to mitigation for physical loss or damage to offsite habitats.	
LP 18: River corridors	None – this policy relates to criteria that would apply to proposals for development along the river corridors.	n/a	n/a	n/a	n/a
LP 19: Moorings and Floating Structures	None – this policy relates to criteria that would apply to proposals for moorings and floating structures.	n/a	n/a	n/a	n/a
LP 20: Climate Change Adaptation	None – this policy will not result in new development.	n/a	n/a	n/a	n/a
LP 21: Flood Risk and Sustainable Drainage	None – this policy will not result in new development.	n/a	n/a	This policy encourages the use of sustainable drainage systems and therefore could contribute to mitigation for impacts on water quality and quantity.	n/a
LP 22: Sustainable Design and Construction	None – this policy will not result in new development.	n/a	n/a	This policy requires certain developments to complete a sustainable	n/a

	Likely activities (operation) to result as a consequence of the proposal	Likely effects if proposal implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the proposal have likely significant effects on European sites (taking mitigation into account)?
				construction checklist and/or achieve a BREEAM of Excellent. These encourage the reduction of noise, light and air pollution associated with development, as well as ecological protection and enhancement. The policy could therefore contribute to mitigation for non-physical disturbance and physical loss of or damage to (offsite) habitat.	
LP 23: Water Resources and Infrastructure	Water supply or waste water facilities	Water quantity and quality	Richmond Park SAC Wimbledon Common SAC South West London Waterbodies SPA	This policy provides mitigation for water quantity and quality impacts. It seeks to protect the borough's water resources and supplies from threats to water quantity and quality. New water supply or water facilities will only be permitted if	No – although this policy permits some new development associated with water supply and treatment, it is of a type that would not affect the qualifying features of the European sites. Overall its effect on water quantity and quality is positive.

	Likely activities (operation) to result as a consequence of the proposal	Likely effects if proposal implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the proposal have likely significant effects on European sites (taking mitigation into account)?
				their need outweighs any adverse environmental impacts. New major developments will need to ensure adequate water supply, drainage and sewage capacity.	
LP 24: Waste Management	None – this policy will not result in new development.	n/a	n/a	This policy encourages developments to make use of the rail and waterway network to transport waste and could therefore contribute to mitigation for air pollution associated with vehicle emissions.	n/a
LP 25: Development in centres	None – this policy relates to criteria that would apply to proposals for development in the borough’s (urban) centres.	n/a	n/a	n/a	n/a
LP 26: Retail Frontages	None – this policy relates to criteria that would apply to proposals for retail development in the borough’s (urban) centres.	n/a	n/a	n/a	n/a

	Likely activities (operation) to result as a consequence of the proposal	Likely effects if proposal implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the proposal have likely significant effects on European sites (taking mitigation into account)?
LP 27: Local Shops, Services and Public Houses	None – this policy relates to criteria that would apply to proposals for retail development in the borough’s (urban) centres.	n/a	n/a	n/a	n/a
LP 28: Social and Community Infrastructure	Social and community infrastructure Increase in vehicle traffic	Physical loss of or damage to habitat Non-physical disturbance Air pollution	Richmond Park SAC Wimbledon Common SAC South West London Waterbodies SPA	Air pollution impacts are mitigated by the following policies which discourage car use and encourage sustainable transport: LP 44 Facilitating sustainable travel choices, LP 45 Parking standards and servicing, and LP 24 Waste management. Policy LP 15 Biodiversity provides mitigation by protecting SSSIs and therefore the SPA and SACs, with some additional protection provided by LP 12 Green infrastructure. Policies LP 9 Floodlighting; LP 10	Uncertain - significant effects from air pollution cannot be ruled out. Air pollution may occur as a result of this policy, due to increases in trips from the overall quantum of development, either from the Richmond Local Plan alone or in combination with plans from neighbouring boroughs/districts. Policy LP 15 protects the European sites from development within their boundaries. Development could have an impact on habitats functionally connected to the European sites, however the areas primarily used by SPA bird species (gadwall and northern shoveler) are protected from development and none of the proposed development sites support significant wetland habitat. There are sufficient records of stag beetle within 2km of Richmond Park SAC that the loss of some areas for

	Likely activities (operation) to result as a consequence of the proposal	Likely effects if proposal implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the proposal have likely significant effects on European sites (taking mitigation into account)?
				Local environmental impacts, pollution and land contamination; and LP 22 Sustainable design and construction seek to minimise the environmental impacts of development and therefore provide mitigation.	<p>development will not significantly affect the SAC population.</p> <p>The urban nature of LBRuT means that background levels of noise, vibration and light are already relatively high, such that the small amount of development that may occur within 500m of the European sites is unlikely to have a significant effect. Mitigation incorporated into the Local Plan further reduces this impact.</p> <p>Physical loss of or damage to onsite or offsite habitat and non-physical disturbance can therefore be screened out of further assessment.</p>
LP 29: Education and Training	Social and community infrastructure Increase in vehicle traffic	Physical loss of or damage to habitat Non-physical disturbance Air pollution	Richmond Park SAC Wimbledon Common SAC South West London Waterbodies SPA	Air pollution impacts are mitigated by the following policies which discourage car use and encourage sustainable transport: LP 44 Facilitating sustainable travel choices, LP 45 Parking standards and servicing, and LP 24 Waste management	<p>Uncertain – significant effects from air pollution cannot be ruled out.</p> <p>Air pollution may occur as a result of this policy, due to increases in trips from the overall quantum of development, either from the Richmond Local Plan alone or in combination with plans from neighbouring boroughs/districts.</p> <p>Policy LP 15 protects the European sites from development within their boundaries. Development could have an impact on habitats</p>

	Likely activities (operation) to result as a consequence of the proposal	Likely effects if proposal implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the proposal have likely significant effects on European sites (taking mitigation into account)?
				<p>Policy LP 15 Biodiversity provides mitigation by protecting SSSIs and therefore the SPA and SACs, with some additional protection provided by LP 12 Green infrastructure.</p> <p>Policies LP 9 Floodlighting; LP 10 Local environmental impacts, pollution and land contamination; and LP 22 Sustainable design and construction seek to minimise the environmental impacts of development and therefore provide mitigation.</p>	<p>functionally connected to the European sites, however the areas primarily used by SPA bird species (gadwall and northern shoveler) are protected from development and none of the proposed development sites support significant wetland habitat. There are sufficient records of stag beetle within 2km of Richmond Park SAC that the loss of some areas for development will not significantly affect the SAC population.</p> <p>The urban nature of LBRuT means that background levels of noise, vibration and light are already relatively high, such that the small amount of development that may occur within 500m of the European sites is unlikely to have a significant effect. Mitigation incorporated into the Local Plan further reduces this impact.</p> <p>Physical loss of or damage to onsite or offsite habitat and non-physical disturbance can therefore be screened out of further assessment.</p>
LP 30: Health and Wellbeing	None – this policy will not result in new development.	n/a	n/a	n/a	n/a
LP 31: Public Open	None – this policy will	n/a	n/a	Encourages new	n/a

	Likely activities (operation) to result as a consequence of the proposal	Likely effects if proposal implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the proposal have likely significant effects on European sites (taking mitigation into account)?
Space, Play Space, Sport and Recreation	not result in new development.			development to provide public open space and space for play, sport and recreation. The policy could therefore provide mitigation for recreational pressure impacts.	
LP 32: Allotments and food growing spaces	None – this policy will not result in new development.	n/a	n/a	n/a	n/a
LP 33: Telecommunications	None – this policy relates to criteria that would apply to proposals for telecommunications development.	n/a	n/a	n/a	n/a
LP 34: New Housing	Residential development (4,725 homes) Increase in vehicle traffic Increase in recreational pressure Increased demand for water supply and treatment	Impacts of recreation Water quality and quantity Air pollution Physical loss of or damage to habitat Non-physical disturbance	Richmond Park SAC Wimbledon Common SAC South West London Waterbodies SPA	Air pollution impacts are mitigated by the following policies which discourage car use and encourage sustainable transport: LP 44 Facilitating sustainable travel choices, LP 45 Parking standards and servicing, and LP 24 Waste management.	Uncertain – significant effects from air pollution cannot be ruled out. Air pollution may occur as a result of this policy, due to increases in trips from the overall quantum of development, either from the Richmond Local Plan alone or in combination with plans from neighbouring boroughs/districts. Policy LP 15 protects the European sites from development within their boundaries. Development could have an impact on habitats

	Likely activities (operation) to result as a consequence of the proposal	Likely effects if proposal implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the proposal have likely significant effects on European sites (taking mitigation into account)?
				<p>Policy LP 15 Biodiversity provides mitigation by protecting SSSIs and therefore the SPA and SACs, with some additional protection provided by LP 12 Green infrastructure.</p> <p>Policies LP 9 Floodlighting; LP 10 Local environmental impacts, pollution and land contamination; and LP 22 Sustainable design and construction seek to minimise the environmental impacts of development and therefore provide mitigation for physical loss of or damage to habitat and non-physical disturbance.</p> <p>Mitigation for water quality and quantity impacts is provided mainly by Policy LP</p>	<p>functionally connected to the European sites, however the areas primarily used by SPA bird species (gadwall and northern shoveler) are protected from development and none of the proposed development sites support significant wetland habitat. There are sufficient records of stag beetle within 2km of Richmond Park SAC that the loss of some areas for development will not significantly affect the SAC population.</p> <p>The urban nature of LBRuT means that background levels of noise, vibration and light are already relatively high, such that the small amount of development that may occur within 500m of the European sites is unlikely to have a significant effect. Mitigation incorporated into the Local Plan further reduces this impact.</p> <p>Housing will largely occur within existing urban areas and utilise existing infrastructure. Planned upgrades, regulatory mechanisms and Policy LP 23 provide sufficient safeguards against significant water quantity and quality effects.</p> <p>Accessibility to Wimbledon Common SAC and the South West</p>

	Likely activities (operation) to result as a consequence of the proposal	Likely effects if proposal implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the proposal have likely significant effects on European sites (taking mitigation into account)?
				<p>23 Water resources and infrastructure, but also LP 21 Flood risk and sustainable drainage.</p> <p>Mitigation for impacts associated with recreation is provided by Policy LP 31 Public open space, play space, sport and recreation.</p>	<p>London Waterbodies SPA mean that they are unlikely to experience significant increases in dog walking or runners, etc. Richmond Park SAC may experience an increase in visitor numbers, but this is unlikely to be significant in the context of existing visitor numbers.</p> <p>Physical loss of or damage to onsite or offsite habitat, non-physical disturbance, recreation impacts and water quality and quantity can therefore be screened out of further assessment.</p>
LP 35: Housing Mix and Standards	None – this policy will not result in new development.	n/a	n/a	n/a	n/a
LP 36: Affordable Housing	None – this policy will not result in new development.	n/a	n/a	n/a	n/a
LP 37: Housing Needs of Different Groups	Residential development Temporary or permanent sites for Gypsies and Travellers Increase in vehicle traffic Increase in recreational pressure Increased demand for water supply and treatment	Impacts of recreation Water quality and quantity Air pollution Physical loss of or damage to habitat Non-physical disturbance	Richmond Park SAC Wimbledon Common SAC South West London Waterbodies SPA	Air pollution impacts are mitigated by the following policies which discourage car use and encourage sustainable transport: LP 44 Facilitating sustainable travel choices, LP 45 Parking standards and servicing, and LP	<p>No – the scale of development coming forward through this policy is likely to be small and of a type that would not affect the qualifying features of the European sites.</p> <p>While air pollution impacts could result in combination with other housing development in the borough, this is considered within the assessment of the overarching</p>

	Likely activities (operation) to result as a consequence of the proposal	Likely effects if proposal implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the proposal have likely significant effects on European sites (taking mitigation into account)?
				<p>24 Waste management</p> <p>Mitigation is also provided by Policies LP 15 Biodiversity; LP 12 Green infrastructure; LP 9 Floodlighting; LP 10 Local environmental impacts, pollution and land contamination; LP 22 Sustainable design; LP 23 Water resources and infrastructure; LP 21 Flood risk and sustainable drainage; Policy LP 31 Public open space, play space, sport and recreation.</p>	'new housing' policy; this policy will not change the overall quantum of development in the borough.
LP 38: Loss of Housing	None – this policy will not result in new development.	n/a	n/a	n/a	n/a
LP 39: Infill, Backland and Backgarden Development	Development of green space	Physical loss of or damage to habitat, and non-physical disturbance (offsite habitats only)	Richmond Park SAC Wimbledon Common SAC South West London Waterbodies SPA	The policy itself provides mitigation in that features important to wildlife and rear garden land that provides wildlife habitat must be	No – the scale of development coming forward through this policy is likely to be small and of a type that would not affect the qualifying features of the European sites.

	Likely activities (operation) to result as a consequence of the proposal	Likely effects if proposal implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect retained.	Could the proposal have likely significant effects on European sites (taking mitigation into account)?
				<p>Mitigation is also provided by Policies LP 15 Biodiversity; LP 12 Green infrastructure; LP 9 Floodlighting; LP 10 Local environmental impacts, pollution and land contamination; and LP 22 Sustainable design.</p>	
LP 40: Employment and local economy	<p>Employment development Increase in vehicle traffic Increased demand for water supply and treatment</p>	<p>Water quality and quantity Air pollution Physical loss of or damage to habitat Non-physical disturbance</p>	<p>Richmond Park SAC Wimbledon Common SAC South West London Waterbodies SPA</p>	<p>Air pollution impacts are mitigated by the following policies which discourage car use and encourage sustainable transport: LP 44 Facilitating sustainable travel choices, LP 45 Parking standards and servicing, and LP 24 Waste management</p> <p>Policy LP 41 directs office employment towards borough</p>	<p>Uncertain – significant effects from air pollution cannot be ruled out.</p> <p>Air pollution may occur as a result of this policy, due to increases in trips from the overall quantum of development, either from the Richmond Local Plan alone or in combination with plans from neighbouring boroughs/districts.</p> <p>Policy LP 15 protects the European sites from development within their boundaries. Development could have an impact on habitats functionally connected to the European sites, however the areas primarily used by SPA bird species</p>

	Likely activities (operation) to result as a consequence of the proposal	Likely effects if proposal implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the proposal have likely significant effects on European sites (taking mitigation into account)?
				<p>centres and key office areas.</p> <p>Mitigation is also provided by Policies LP 15 Biodiversity; LP 12 Green infrastructure; LP 9 Floodlighting; LP 10 Local environmental impacts, pollution and land contamination; LP 22 Sustainable design; LP 23 Water resources and infrastructure; LP 21 Flood risk and sustainable drainage.</p>	<p>(gadwall and northern shoveler) are protected from development and none of the proposed development sites support significant wetland habitat. There are sufficient records of stag beetle within 2km of Richmond Park SAC that the loss of some areas for development will not significantly affect the SAC population.</p> <p>The urban nature of LBRuT means that background levels of noise, vibration and light are already relatively high, such that the small amount of development that may occur within 500m of the European sites is unlikely to have a significant effect. Mitigation incorporated into the Local Plan further reduces this impact.</p> <p>Housing will largely occur within existing urban areas and utilise existing infrastructure. Planned upgrades, regulatory mechanisms and Policy LP 23 provide sufficient safeguards against significant water quantity and quality effects.</p> <p>Physical loss of or damage to onsite or offsite habitat, non-physical disturbance and water quality and quantity can therefore be screened out of further</p>

	Likely activities (operation) to result as a consequence of the proposal	Likely effects if proposal implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the proposal have likely significant effects on European sites (taking mitigation into account)?
					assessment.
LP 41: Offices	None – this policy relates to criteria that would apply to proposals for employment development.	n/a	n/a	This policy encourages most employment development to be within borough centres, which provides some mitigation for the potential physical loss of or damage to habitat and non-physical disturbance effects of general employment development	n/a
LP 42: Industrial Land and Business Parks	Industrial development	Water quality and quantity Air pollution Physical loss of or damage to habitat Non-physical disturbance	Richmond Park SAC Wimbledon Common SAC South West London Waterbodies SPA	Air pollution impacts are mitigated by the following policies which discourage car use and encourage sustainable transport: LP 44 Facilitating sustainable travel choices, LP 45 Parking standards and servicing, and LP 24 Waste management Mitigation is provided by Policies	Uncertain – significant effects from air pollution cannot be ruled out. Air pollution may occur as a result of this policy, due to increases in trips from the overall quantum of development, either from the Richmond Local Plan alone or in combination with plans from neighbouring boroughs/districts. Policy LP 15 protects the European sites from development within their boundaries. Development could have an impact on habitats functionally connected to the

	Likely activities (operation) to result as a consequence of the proposal	Likely effects if proposal implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the proposal have likely significant effects on European sites (taking mitigation into account)?
				<p>LP 15 Biodiversity; LP 12 Green infrastructure; LP 9 Floodlighting; LP 10 Local environmental impacts, pollution and land contamination; LP 22 Sustainable design; LP 23 Water resources and infrastructure; LP 21 Flood risk and sustainable drainage.</p>	<p>European sites, however the areas primarily used by SPA bird species (gadwall and northern shoveler) are protected from development. There are sufficient records of stag beetle within 2km of Richmond Park SAC that the loss of some areas for development will not significantly affect the SAC population.</p> <p>The urban nature of LBRuT means that background levels of noise, vibration and light are already relatively high, such that the small amount of development that may occur within 500m of the European sites is unlikely to have a significant effect. Mitigation incorporated into the Local Plan further reduces this impact.</p> <p>Development will largely occur within existing urban areas and utilise existing infrastructure. Planned upgrades, regulatory mechanisms and Policy LP 23 provide sufficient safeguards against significant water quantity and quality effects.</p> <p>Physical loss of or damage to onsite or offsite habitat, non-physical disturbance and water quality and quantity can therefore</p>

	Likely activities (operation) to result as a consequence of the proposal	Likely effects if proposal implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the proposal have likely significant effects on European sites (taking mitigation into account)?
					be screened out of further assessment.
LP 43: Visitor Economy	Increased tourism Increase in vehicle traffic Increase in recreational pressure Increased demand for water supply and treatment	Impacts of recreation Water quality and quantity Air pollution	Richmond Park SAC Wimbledon Common SAC South West London Waterbodies SPA	Air pollution impacts are mitigated by the following policies which discourage car use and encourage sustainable transport: LP 44 Facilitating sustainable travel choices, LP 45 Parking standards and servicing, and LP 24 Waste management Mitigation is also provided by Policies LP 15 Biodiversity; LP 12 Green infrastructure; LP 9 Floodlighting; LP 23 Water resources and infrastructure; LP 21 Flood risk and sustainable drainage; Policy LP 31 Public open space, play space, sport and recreation.	No – the scale of development coming forward through this policy is likely to be small and of a type that would not affect the qualifying features of the European sites.
LP 44: Facilitating	None – this policy will	n/a	n/a	This policy seeks to	n/a

	Likely activities (operation) to result as a consequence of the proposal	Likely effects if proposal implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the proposal have likely significant effects on European sites (taking mitigation into account)?
Sustainable Travel Choices	not result in new development.			reduce the impact of development including in relation to congestion and air pollution. As such, it may contribute to mitigation for air pollution effects.	
LP 45: Parking standards and servicing	None – this policy will not result in new development.	n/a	n/a	This policy seeks to reduce the impact of car travel on the local environment by controlling parking provision. As such, it may contribute to mitigation for air pollution effects.	n/a
Allocated sites					
SA 1: Hampton Square, Hampton	Residential development Employment development Community and social infrastructure development Increase in vehicle traffic Increase in recreational pressure Increased demand for water treatment	Impacts of recreation Water quality and quantity Air pollution Physical loss of or damage to habitat	Richmond Park SAC Wimbledon Common SAC South West London Waterbodies SPA	Mitigation is provided by Policies LP 15 Biodiversity; LP 12 Green infrastructure; LP 9 Floodlighting; LP 10 Local environmental impacts, pollution and land contamination; LP 22 Sustainable design; LP 23 Water resources and infrastructure; LP 21 Flood risk and	No – This site alone will not contribute to a significant increase in air pollution or recreation impacts. The potential for air pollution or recreation impacts in combination with other developments is considered within the assessment of overall development (Policies LP 28 Social and community infrastructure, LP 29 Education and training, LP 34 New Housing, LP 40 Employment and local economy, LP 42 Industrial land and business parks. This site is not within a European

	Likely activities (operation) to result as a consequence of the proposal	Likely effects if proposal implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the proposal have likely significant effects on European sites (taking mitigation into account)?
				sustainable drainage; Policy LP 31 Public open space, play space, sport and recreation; LP 44 Facilitating sustainable travel choices; LP 45 Parking standards and servicing; and LP 24 Waste management.	<p>site and lies more than 500m from a European site. Non-physical disturbance can therefore be screened out.</p> <p>This site does not support significant wetland habitat (and therefore SPA bird species) and stag beetles have not been recorded in or near this site. Development of this site will therefore not cause physical loss of or damage to habitats functionally linked to the European sites.</p> <p>Planned upgrades, regulatory mechanisms and Policy LP 23 provide sufficient safeguards against significant water quantity and quality effects.</p>
SA 2: Platts Eyot, Hampton	Residential development Employment development Increase in vehicle traffic Increase in recreational pressure Increased demand for water treatment	Impacts of recreation Water quality and quantity Air pollution Physical loss of or damage to habitat	Richmond Park SAC Wimbledon Common SAC South West London Waterbodies SPA	Mitigation is provided by Policies LP 15 Biodiversity; LP 12 Green infrastructure; LP 9 Floodlighting; LP 10 Local environmental impacts, pollution and land contamination; LP 22 Sustainable design; LP 23 Water resources and infrastructure; LP 21	<p>No - This site alone will not contribute to a significant increase in air pollution or recreation impacts. The potential for air pollution or recreation impacts in combination with other developments is considered within the assessment of overall development (LP 34 New Housing, LP 40 Employment and local economy).</p> <p>This site is not within a European site and lies more than 500m from</p>

	Likely activities (operation) to result as a consequence of the proposal	Likely effects if proposal implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the proposal have likely significant effects on European sites (taking mitigation into account)?
				Flood risk and sustainable drainage; Policy LP 31 Public open space, play space, sport and recreation; LP 44 Facilitating sustainable travel choices; LP 45 Parking standards and servicing; and LP 24 Waste management.	a European site. Non-physical disturbance can therefore be screened out. This site does not support significant wetland habitat (and therefore SPA bird species) but stag beetles have been recorded in or near this site. However, it lies more than 2km from Richmond Park SAC. Development of this site will therefore not cause physical loss of or damage to habitats functionally linked to the European sites. Planned upgrades, regulatory mechanisms and Policy LP 23 provide sufficient safeguards against significant water quantity and quality effects.
SA 3: Hampton Traffic Unit, 60-68 Station Road, Hampton	Employment development Community and social infrastructure development Increase in vehicle traffic Increase in recreational pressure Increased demand for water treatment	Impacts of recreation Water quality and quantity Air pollution	Richmond Park SAC Wimbledon Common SAC South West London Waterbodies SPA	Mitigation is provided by Policies LP 15 Biodiversity; LP 12 Green infrastructure; LP 23 Water resources and infrastructure; LP 21 Flood risk and sustainable drainage; Policy LP 31 Public open space, play space, sport and recreation;	No – This site alone will not contribute to a significant increase in air pollution or recreation impacts. The potential for air pollution or recreation impacts in combination with other developments is considered within the assessment of overall development (Policies LP 28 Social and community infrastructure, LP 29 Education and training, LP 40 Employment and local economy).

	Likely activities (operation) to result as a consequence of the proposal	Likely effects if proposal implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the proposal have likely significant effects on European sites (taking mitigation into account)?
				LP 44 Facilitating sustainable travel choices; LP 45 Parking standards and servicing; and LP 24 Waste management.	<p>This site is not within a European site and lies more than 500m from a European site. Non-physical disturbance can therefore be screened out.</p> <p>This site does not support significant wetland habitat (and therefore SPA bird species) and stag beetles have not been recorded in or near this site. Development of this site will therefore not cause physical loss of or damage to habitats functionally linked to the European sites.</p> <p>Planned upgrades, regulatory mechanisms and Policy LP 23 provide sufficient safeguards against significant water quantity and quality effects.</p>
SA 4: Hampton Delivery Office, Rosehill, Hampton	<p>Employment development</p> <p>Community and social infrastructure development</p> <p>Increase in vehicle traffic</p> <p>Increase in recreational pressure</p> <p>Increased demand for water treatment</p>	<p>Impacts of recreation</p> <p>Water quality and quantity</p> <p>Air pollution</p>	<p>Richmond Park SAC</p> <p>Wimbledon Common SAC</p> <p>South West London Waterbodies SPA</p>	<p>Mitigation is provided by Policies LP 15 Biodiversity; LP 12 Green infrastructure; LP 23 Water resources and infrastructure; LP 21 Flood risk and sustainable drainage; Policy LP 31 Public open space, play space, sport and recreation;</p>	<p>No - This site alone will not contribute to a significant increase in air pollution or recreation impacts. The potential for air pollution or recreation impacts in combination with other developments is considered within the assessment of overall development (Policies LP 28 Social and community infrastructure, LP 29 Education and training, LP 40 Employment and local economy).</p>

	Likely activities (operation) to result as a consequence of the proposal	Likely effects if proposal implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the proposal have likely significant effects on European sites (taking mitigation into account)?
				LP 44 Facilitating sustainable travel choices; LP 45 Parking standards and servicing; and LP 24 Waste management.	<p>This site is not within a European site and lies more than 500m from a European site. Non-physical disturbance can therefore be screened out.</p> <p>This site does not support significant wetland habitat (and therefore SPA bird species) and stag beetles have not been recorded in or near this site. Development of this site will therefore not cause physical loss of or damage to habitats functionally linked to the European sites.</p> <p>Planned upgrades, regulatory mechanisms and Policy LP 23 provide sufficient safeguards against significant water quantity and quality effects.</p>
SA 5: Telephone Exchange, Teddington	<p>Employment development</p> <p>Residential development</p> <p>Increase in vehicle traffic</p> <p>Increase in recreational pressure</p> <p>Increased demand for water treatment</p>	<p>Impacts of recreation</p> <p>Water quality and quantity</p> <p>Air pollution</p>	<p>Richmond Park SAC</p> <p>Wimbledon Common SAC</p> <p>South West London Waterbodies SPA</p>	<p>Mitigation is provided by Policies LP 15 Biodiversity; LP 12 Green infrastructure; LP 23 Water resources and infrastructure; LP 21 Flood risk and sustainable drainage; Policy LP 31 Public open space, play space, sport and recreation;</p>	<p>No - This site alone will not contribute to a significant increase in air pollution or recreation impacts. The potential for air pollution or recreation impacts in combination with other developments is considered within the assessment of overall development (LP 34 New Housing, LP 40 Employment and local economy).</p> <p>This site is not within a European</p>

	Likely activities (operation) to result as a consequence of the proposal	Likely effects if proposal implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the proposal have likely significant effects on European sites (taking mitigation into account)?
				LP 44 Facilitating sustainable travel choices; LP 45 Parking standards and servicing; and LP 24 Waste management.	<p>site and lies more than 500m from a European site. Non-physical disturbance can therefore be screened out.</p> <p>This site does not support significant wetland habitat (and therefore SPA bird species) and stag beetles have not been recorded in or near this site. Development of this site will therefore not cause physical loss of or damage to habitats functionally linked to the European sites.</p> <p>Planned upgrades, regulatory mechanisms and Policy LP 23 provide sufficient safeguards against significant water quantity and quality effects.</p>
SA 6: Teddington Delivery Office, Teddington	<p>Employment development</p> <p>Residential development</p> <p>Increase in vehicle traffic</p> <p>Increase in recreational pressure</p> <p>Increased demand for water treatment</p>	<p>Impacts of recreation</p> <p>Water quality and quantity</p> <p>Air pollution</p>	<p>Richmond Park SAC</p> <p>Wimbledon Common SAC</p> <p>South West London Waterbodies SPA</p>	<p>Mitigation is provided by Policies LP 15 Biodiversity; LP 12 Green infrastructure; LP 9 Floodlighting; LP 10 Local environmental impacts, pollution and land contamination; LP 22 Sustainable design; LP 23 Water resources and infrastructure; LP 21</p>	<p>No - This site alone will not contribute to a significant increase in air pollution or recreation impacts. The potential for air pollution or recreation impacts in combination with other developments is considered within the assessment of overall development (LP 34 New Housing, LP 40 Employment and local economy).</p> <p>This site is not within a European site and lies more than 500m from</p>

	Likely activities (operation) to result as a consequence of the proposal	Likely effects if proposal implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the proposal have likely significant effects on European sites (taking mitigation into account)?
				Flood risk and sustainable drainage; Policy LP 31 Public open space, play space, sport and recreation; LP 44 Facilitating sustainable travel choices; LP 45 Parking standards and servicing; and LP 24 Waste management.	<p>a European site. Non-physical disturbance can therefore be screened out.</p> <p>This site does not support significant wetland habitat (and therefore SPA bird species) and stag beetles have not been recorded in or near this site. Development of this site will therefore not cause physical loss of or damage to habitats functionally linked to the European sites.</p> <p>Planned upgrades, regulatory mechanisms and Policy LP 23 provide sufficient safeguards against significant water quantity and quality effects.</p>
SA 7: Strathmore Centre, Strathmore Road, Teddington	<p>Community and social infrastructure development</p> <p>Increase in vehicle traffic</p> <p>Increase in recreational pressure</p> <p>Increased demand for water treatment</p>	<p>Impacts of recreation</p> <p>Water quality and quantity</p> <p>Air pollution</p>	<p>Richmond Park SAC</p> <p>Wimbledon Common SAC</p> <p>South West London Waterbodies SPA</p>	<p>Mitigation is provided by Policies LP 15 Biodiversity; LP 12 Green infrastructure; LP 23 Water resources and infrastructure; LP 21 Flood risk and sustainable drainage; Policy LP 31 Public open space, play space, sport and recreation; LP 44 Facilitating sustainable travel</p>	<p>No - This site alone will not contribute to a significant increase in air pollution or recreation impacts. The potential for air pollution or recreation impacts in combination with other developments is considered within the assessment of overall development (Policies LP 28 Social and community infrastructure, LP 29 Education and training).</p> <p>This site is not within a European site and lies more than 500m from a European site. Non-physical</p>

	Likely activities (operation) to result as a consequence of the proposal	Likely effects if proposal implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the proposal have likely significant effects on European sites (taking mitigation into account)?
				choices; LP 45 Parking standards and servicing; and LP 24 Waste management.	disturbance can therefore screened out. This site does not support significant wetland habitat (and therefore SPA bird species) and stag beetles have not been recorded in or near this site. Development of this site will therefore not cause physical loss of or damage to habitats functionally linked to the European sites. Planned upgrades, regulatory mechanisms and Policy LP 23 provide sufficient safeguards against significant water quantity and quality effects.
SA 8: St Mary's University, Strawberry Hill	Social and community infrastructure development Residential development Increase in vehicle traffic Increase in recreational pressure Increased demand for water treatment	Impacts of recreation Water quality and quantity Air pollution Physical loss of or damage to habitat	Richmond Park SAC Wimbledon Common SAC South West London Waterbodies SPA	Mitigation is provided by Policies LP 15 Biodiversity; LP 12 Green infrastructure; LP 9 Floodlighting; LP 10 Local environmental impacts, pollution and land contamination; LP 22 Sustainable design; LP 23 Water resources and infrastructure; LP 21 Flood risk and sustainable	No - This site alone will not contribute to a significant increase in air pollution or recreation impacts. The potential for air pollution or recreation impacts in combination with other developments is considered within the assessment of overall development (Policies LP 28 Social and community infrastructure, LP 29 Education and training, LP 34 New Housing). This site is not within a European site and lies more than 500m from a European site. Non-physical

	Likely activities (operation) to result as a consequence of the proposal	Likely effects if proposal implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the proposal have likely significant effects on European sites (taking mitigation into account)?
				drainage; Policy LP 31 Public open space, play space, sport and recreation; LP 44 Facilitating sustainable travel choices; LP 45 Parking standards and servicing; and LP 24 Waste management.	disturbance can therefore screened out. This site does not support significant wetland habitat (and therefore SPA bird species) but stag beetles have been recorded in or near this site. However, it lies more than 2km from Richmond Park SAC Development of this site will therefore not cause physical loss of or damage to habitats functionally linked to the European sites. Planned upgrades, regulatory mechanisms and Policy LP 23 provide sufficient safeguards against significant water quantity and quality effects.
SA 9: Richmond upon Thames College, Twickenham	Social and community infrastructure development Residential development Increase in vehicle traffic Increase in recreational pressure Increased demand for water treatment	Impacts of recreation Water quality and quantity Air pollution	Richmond Park SAC Wimbledon Common SAC South West London Waterbodies SPA	Mitigation is provided by Policies LP 15 Biodiversity; LP 12 Green infrastructure; LP 23 Water resources and infrastructure; LP 21 Flood risk and sustainable drainage; Policy LP 31 Public open space, play space, sport and recreation; LP 44 Facilitating	No - This site alone will not contribute to a significant increase in air pollution or recreation impacts. The potential for air pollution or recreation impacts in combination with other developments is considered within the assessment of overall development (Policies LP 28 Social and community infrastructure, LP 29 Education and training, LP 34 New Housing). This site is not within a European

	Likely activities (operation) to result as a consequence of the proposal	Likely effects if proposal implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the proposal have likely significant effects on European sites (taking mitigation into account)?
				sustainable travel choices; LP 45 Parking standards and servicing; and LP 24 Waste management.	<p>site and lies more than 500m from a European site. Non-physical disturbance can therefore be screened out.</p> <p>This site does not support significant wetland habitat (and therefore SPA bird species) but stag beetles have been recorded in or near this site. However, it lies more than 2km from Richmond Park SAC. Development of this site will therefore not cause physical loss of or damage to habitats functionally linked to the European sites.</p> <p>Planned upgrades, regulatory mechanisms and Policy LP 23 provide sufficient safeguards against significant water quantity and quality effects.</p>
SA 10: The Stoop (Harlequins Rugby Football Club), Twickenham	<p>Recreation / leisure development</p> <p>Hotel / employment development</p> <p>Increase in vehicle traffic</p> <p>Increase in recreational pressure</p> <p>Increased demand for water treatment</p>	<p>Impacts of recreation</p> <p>Water quality and quantity</p> <p>Air pollution</p>	<p>Richmond Park SAC</p> <p>Wimbledon Common SAC</p> <p>South West London Waterbodies SPA</p>	<p>Mitigation is provided by Policies LP 15 Biodiversity; LP 12 Green infrastructure; LP 23 Water resources and infrastructure; LP 21 Flood risk and sustainable drainage; Policy LP 31 Public open space, play space,</p>	<p>No - This site alone will not contribute to a significant increase in air pollution or recreation impacts. The potential for air pollution or recreation impacts in combination with other developments is considered within the assessment of overall development (Policies LP 28 Social and community infrastructure, LP 40 Employment and local</p>

	Likely activities (operation) to result as a consequence of the proposal	Likely effects if proposal implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the proposal have likely significant effects on European sites (taking mitigation into account)?
				sport and recreation; LP 44 Facilitating sustainable travel choices; LP 45 Parking standards and servicing; and LP 24 Waste management.	economy). This site is not within a European site and lies more than 500m from a European site. Non-physical disturbance can therefore be screened out. This site does not support significant wetland habitat (and therefore SPA bird species) and stag beetles have not been recorded in or near this site. Development of this site will therefore not cause physical loss of or damage to habitats functionally linked to the European sites. Planned upgrades, regulatory mechanisms and Policy LP 23 provide sufficient safeguards against significant water quantity and quality effects.
SA 11: Twickenham Stadium, Twickenham	Recreation / leisure development Hotel / employment development Increase in vehicle traffic Increase in recreational pressure Increased demand for water treatment	Impacts of recreation Water quality and quantity Air pollution	Richmond Park SAC Wimbledon Common SAC South West London Waterbodies SPA	Mitigation is provided by Policies LP 15 Biodiversity; LP 12 Green infrastructure; LP 23 Water resources and infrastructure; LP 21 Flood risk and sustainable drainage; Policy LP 31 Public open	No - This site alone will not contribute to a significant increase in air pollution or recreation impacts. The potential for air pollution or recreation impacts in combination with other developments is considered within the assessment of overall development (Policies LP 28 Social and community infrastructure, LP 40 Employment and local

	Likely activities (operation) to result as a consequence of the proposal	Likely effects if proposal implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the proposal have likely significant effects on European sites (taking mitigation into account)?
				space, play space, sport and recreation; LP 44 Facilitating sustainable travel choices; LP 45 Parking standards and servicing; and LP 24 Waste management.	economy). This site is not within a European site and lies more than 500m from a European site. Non-physical disturbance can therefore be screened out. This site does not support significant wetland habitat (and therefore SPA bird species) and stag beetles have not been recorded in or near this site. Development of this site will therefore not cause physical loss of or damage to habitats functionally linked to the European sites. Planned upgrades, regulatory mechanisms and Policy LP 23 provide sufficient safeguards against significant water quantity and quality effects.
SA 12: Mereway Day Centre, Mereway Road, Twickenham	Social and community infrastructure development Increase in vehicle traffic Increase in recreational pressure Increased demand for water treatment	Impacts of recreation Water quality and quantity Air pollution	Richmond Park SAC Wimbledon Common SAC South West London Waterbodies SPA	Mitigation is provided by Policies LP 15 Biodiversity; LP 12 Green infrastructure; LP 23 Water resources and infrastructure; LP 21 Flood risk and sustainable drainage; Policy LP 31 Public open	No - This site alone will not contribute to a significant increase in air pollution or recreation impacts. The potential for air pollution or recreation impacts in combination with other developments is considered within the assessment of overall development (Policies LP 28 Social and community infrastructure, LP

	Likely activities (operation) to result as a consequence of the proposal	Likely effects if proposal implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the proposal have likely significant effects on European sites (taking mitigation into account)?
				space, play space, sport and recreation; LP 44 Facilitating sustainable travel choices; LP 45 Parking standards and servicing; and LP 24 Waste management.	29 Education and training). This site is not within a European site and lies more than 500m from a European site. Non-physical disturbance can therefore be screened out. This site does not support significant wetland habitat (and therefore SPA bird species) and stag beetles have not been recorded in or near this site. Development of this site will therefore not cause physical loss of or damage to habitats functionally linked to the European sites. Planned upgrades, regulatory mechanisms and Policy LP 23 provide sufficient safeguards against significant water quantity and quality effects.
SA 13: Telephone Exchange, Whitton	Employment development Residential development Social and community infrastructure development Increase in vehicle traffic Increase in recreational pressure Increased demand for water treatment	Impacts of recreation Water quality and quantity Air pollution	Richmond Park SAC Wimbledon Common SAC South West London Waterbodies SPA	Mitigation is provided by Policies LP 15 Biodiversity; LP 12 Green infrastructure; LP 23 Water resources and infrastructure; LP 21 Flood risk and sustainable drainage; Policy LP 31 Public open	No - This site alone will not contribute to a significant increase in air pollution or recreation impacts. The potential for air pollution or recreation impacts in combination with other developments is considered within the assessment of overall development (Policies LP 28 Social and community infrastructure, LP 29 Education and training, LP 34

	Likely activities (operation) to result as a consequence of the proposal	Likely effects if proposal implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the proposal have likely significant effects on European sites (taking mitigation into account)?
				space, play space, sport and recreation; LP 44 Facilitating sustainable travel choices; LP 45 Parking standards and servicing; and LP 24 Waste management.	<p>New Housing, LP 40 Employment and local economy).</p> <p>This site is not within a European site and lies more than 500m from a European site. Non-physical disturbance can therefore be screened out.</p> <p>This site does not support significant wetland habitat (and therefore SPA bird species) and stag beetles have not been recorded in or near this site. Development of this site will therefore not cause physical loss of or damage to habitats functionally linked to the European sites.</p> <p>Planned upgrades, regulatory mechanisms and Policy LP 23 provide sufficient safeguards against significant water quantity and quality effects.</p>
SA 14 Kneller Hall, Whitton	Residential development Employment development Social and community infrastructure development Increase in vehicle traffic Increase in recreational pressure Increased demand for	Impacts of recreation Water quality and quantity Air pollution	Richmond Park SAC Wimbledon Common SAC South West London Waterbodies SPA	Mitigation is provided by Policies LP 15 Biodiversity; LP 12 Green infrastructure; LP 23 Water resources and infrastructure; LP 21 Flood risk and sustainable drainage; Policy LP	No - This site alone will not contribute to a significant increase in air pollution or recreation impacts. The potential for air pollution or recreation impacts in combination with other developments is considered within the assessment of overall development (Policies LP 28 Social and community infrastructure, LP

	Likely activities (operation) to result as a consequence of the proposal	Likely effects if proposal implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the proposal have likely significant effects on European sites (taking mitigation into account)?
	water treatment			31 Public open space, play space, sport and recreation; LP 44 Facilitating sustainable travel choices; LP 45 Parking standards and servicing; and LP 24 Waste management.	29 Education and training, LP 34 New Housing, LP 40 Employment and local economy). This site is not within a European site and lies more than 500m from a European site. Non-physical disturbance can therefore be screened out. This site does not support significant wetland habitat (and therefore SPA bird species) and stag beetles have not been recorded in or near this site. Development of this site will therefore not cause physical loss of or damage to habitats functionally linked to the European sites. Planned upgrades, regulatory mechanisms and Policy LP 23 provide sufficient safeguards against significant water quantity and quality effects.
SA 15: Ham Close, Ham	Residential development Increase in vehicle traffic Increase in recreational pressure Increased demand for water treatment	Impacts of recreation Water quality and quantity Air pollution	Richmond Park SAC Wimbledon Common SAC South West London Waterbodies SPA	Mitigation is provided by Policies LP 15 Biodiversity; LP 12 Green infrastructure; LP 23 Water resources and infrastructure; LP 21 Flood risk and sustainable	No - This site alone will not contribute to a significant increase in air pollution or recreation impacts. The potential for air pollution or recreation impacts in combination with other developments is considered within the assessment of overall

	Likely activities (operation) to result as a consequence of the proposal	Likely effects if proposal implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the proposal have likely significant effects on European sites (taking mitigation into account)?
				<p>drainage; Policy LP 31 Public open space, play space, sport and recreation; LP 44 Facilitating sustainable travel choices; LP 45 Parking standards and servicing; and LP 24 Waste management.</p>	<p>development (LP 34 New Housing).</p> <p>This site is not within a European site and lies more than 500m from a European site. Non-physical disturbance can therefore be screened out.</p> <p>This site does not support significant wetland habitat (and therefore SPA bird species) and stag beetles have not been recorded in or near this site. Development of this site will therefore not cause physical loss of or damage to habitats functionally linked to the European sites.</p> <p>Planned upgrades, regulatory mechanisms and Policy LP 23 provide sufficient safeguards against significant water quantity and quality effects.</p>
SA 16: Cassel Hospital, Ham Common, Ham	<p>Social and community infrastructure development</p> <p>Increase in vehicle traffic</p> <p>Increase in recreational pressure</p> <p>Increased demand for water treatment</p>	<p>Impacts of recreation</p> <p>Water quality and quantity</p> <p>Air pollution</p>	<p>Richmond Park SAC</p> <p>Wimbledon Common SAC</p> <p>South West London Waterbodies SPA</p>	<p>Mitigation is provided by Policies LP 15 Biodiversity; LP 12 Green infrastructure; LP 23 Water resources and infrastructure; LP 21 Flood risk and sustainable drainage; Policy LP 31 Public open</p>	<p>No - This site alone will not contribute to a significant increase in air pollution or recreation impacts. The potential for air pollution or recreation impacts in combination with other developments is considered within the assessment of overall development (Policies LP 28 Social and community infrastructure, LP</p>

	Likely activities (operation) to result as a consequence of the proposal	Likely effects if proposal implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the proposal have likely significant effects on European sites (taking mitigation into account)?
				space, play space, sport and recreation; LP 44 Facilitating sustainable travel choices; LP 45 Parking standards and servicing; and LP 24 Waste management.	<p>29 Education and training).</p> <p>This site is not within a European site and lies more than 500m from a European site. Non-physical disturbance can therefore be screened out.</p> <p>This site does not support significant wetland habitat (and therefore SPA bird species) and stag beetles have not been recorded in or near this site. Development of this site will therefore not cause physical loss of or damage to habitats functionally linked to the European sites.</p> <p>Planned upgrades, regulatory mechanisms and Policy LP 23 provide sufficient safeguards against significant water quantity and quality effects.</p>
SA 17: St Michael's Convent, Ham Common	<p>Social and community infrastructure development</p> <p>Increase in vehicle traffic</p> <p>Increase in recreational pressure</p> <p>Increased demand for water treatment</p>	<p>Impacts of recreation</p> <p>Water quality and quantity</p> <p>Air pollution</p>	<p>Richmond Park SAC</p> <p>Wimbledon Common SAC</p> <p>South West London Waterbodies SPA</p>	<p>Mitigation is provided by Policies LP 15 Biodiversity; LP 12 Green infrastructure; LP 23 Water resources and infrastructure; LP 21 Flood risk and sustainable drainage; Policy LP 31 Public open</p>	<p>No - This site alone will not contribute to a significant increase in air pollution or recreation impacts. The potential for air pollution or recreation impacts in combination with other developments is considered within the assessment of overall development (Policies LP 28 Social and community infrastructure, LP</p>

	Likely activities (operation) to result as a consequence of the proposal	Likely effects if proposal implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the proposal have likely significant effects on European sites (taking mitigation into account)?
				space, play space, sport and recreation; LP 44 Facilitating sustainable travel choices; LP 45 Parking standards and servicing; and LP 24 Waste management.	<p>29 Education and training).</p> <p>This site is not within a European site and lies more than 500m from a European site. Non-physical disturbance can therefore be screened out.</p> <p>This site does not support significant wetland habitat (and therefore SPA bird species) but stag beetles have been recorded in or near this site and the site is within 2km of Richmond Park SAC. Loss of this site alone would not have a significant impact on the SAC. The potential in-combination effect of developing this site has been considered within the assessment of overall development, as above.</p> <p>Planned upgrades, regulatory mechanisms and Policy LP 23 provide sufficient safeguards against significant water quantity and quality effects.</p>
SA 18: Ryde House, East Twickenham	<p>Social and community infrastructure development</p> <p>Retail development</p> <p>Increase in vehicle traffic</p> <p>Increase in recreational pressure</p>	<p>Impacts of recreation</p> <p>Water quality and quantity</p> <p>Air pollution</p>	<p>Richmond Park SAC</p> <p>Wimbledon Common SAC</p> <p>South West London Waterbodies SPA</p>	<p>Mitigation is provided by Policies LP 15 Biodiversity; LP 12 Green infrastructure; LP 23 Water resources and infrastructure; LP 21</p>	<p>No - This site alone will not contribute to a significant increase in air pollution or recreation impacts. The potential for air pollution or recreation impacts in combination with other developments is considered within</p>

	Likely activities (operation) to result as a consequence of the proposal	Likely effects if proposal implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the proposal have likely significant effects on European sites (taking mitigation into account)?
	Increased demand for water treatment			Flood risk and sustainable drainage; Policy LP 31 Public open space, play space, sport and recreation; LP 44 Facilitating sustainable travel choices; LP 45 Parking standards and servicing; and LP 24 Waste management.	<p>the assessment of overall development (Policies LP 28 Social and community infrastructure, LP 40 Employment and local economy).</p> <p>This site is not within a European site and lies more than 500m from a European site. Non-physical disturbance can therefore be screened out.</p> <p>This site does not support significant wetland habitat (and therefore SPA bird species) and stag beetles have not been recorded in or near this site. Development of this site will therefore not cause physical loss of or damage to habitats functionally linked to the European sites.</p> <p>Planned upgrades, regulatory mechanisms and Policy LP 23 provide sufficient safeguards against significant water quantity and quality effects.</p>
SA 19: Richmond Station, Richmond	Employment development Social and community infrastructure development Retail development Sustainable transport	Impacts of recreation Water quality and quantity Air pollution Physical loss of or damage to habitat	Richmond Park SAC Wimbledon Common SAC South West London Waterbodies SPA	The policy will result in improvements to station, which may encourage sustainable transport use and provide mitigation for air	No - This site alone will not contribute to a significant increase in air pollution or recreation impacts. The potential for air pollution or recreation impacts in combination with other developments is considered within

	Likely activities (operation) to result as a consequence of the proposal	Likely effects if proposal implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the proposal have likely significant effects on European sites (taking mitigation into account)?
	<p>infrastructure Increase in vehicle traffic Increase in recreational pressure Increased demand for water treatment</p>			<p>pollution impacts.</p> <p>Mitigation is also provided by Policies LP 15 Biodiversity; LP 12 Green infrastructure; LP 9 Floodlighting; LP 10 Local environmental impacts, pollution and land contamination; LP 22 Sustainable design; LP 23 Water resources and infrastructure; LP 21 Flood risk and sustainable drainage; Policy LP 31 Public open space, play space, sport and recreation; LP 44 Facilitating sustainable travel choices; LP 45 Parking standards and servicing; and LP 24 Waste management.</p>	<p>the assessment of overall development (Policies LP 28 Social and community infrastructure, LP 29 Education and training, LP 40 Employment and local economy).</p> <p>This site is not within a European site and lies more than 500m from a European site. Non-physical disturbance can therefore be screened out.</p> <p>This site does not support significant wetland habitat (and therefore SPA bird species) but stag beetles have been recorded in or near this site and the site is within 2km of Richmond Park SAC. Loss of this site alone would not have a significant impact on the SAC. The potential in-combination effect of developing this site has been considered within the assessment of overall development, as above.</p> <p>Planned upgrades, regulatory mechanisms and Policy LP 23 provide sufficient safeguards against significant water quantity and quality effects.</p>
SA 20: Friars Lane Car Park, Richmond	<p>Residential development Increase in vehicle traffic Increase in recreational</p>	<p>Impacts of recreation Water quality and</p>	<p>Richmond Park SAC Wimbledon</p>	<p>Mitigation is provided by Policies LP 15 Biodiversity;</p>	<p>No - This site alone will not contribute to a significant increase in air pollution or recreation</p>

	Likely activities (operation) to result as a consequence of the proposal	Likely effects if proposal implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the proposal have likely significant effects on European sites (taking mitigation into account)?
	pressure Increased demand for water treatment	quantity Air pollution	Common SAC South West London Waterbodies SPA	LP 12 Green infrastructure; LP 23 Water resources and infrastructure; LP 21 Flood risk and sustainable drainage; Policy LP 31 Public open space, play space, sport and recreation; LP 44 Facilitating sustainable travel choices; LP 45 Parking standards and servicing; and LP 24 Waste management.	impacts. The potential for air pollution or recreation impacts in combination with other developments is considered within the assessment of overall development (LP 34 New Housing). This site is not within a European site and lies more than 500m from a European site. Non-physical disturbance can therefore be screened out. This site does not support significant wetland habitat (and therefore SPA bird species) and stag beetles have not been recorded in or near this site. Development of this site will therefore not cause physical loss of or damage to habitats functionally linked to the European sites. Planned upgrades, regulatory mechanisms and Policy LP 23 provide sufficient safeguards against significant water quantity and quality effects.
SA 21: Sainsbury's, Lower Richmond Road, Richmond	Retail development Residential development Increase in vehicle traffic Increase in recreational pressure Increased demand for	Impacts of recreation Water quality and quantity Air pollution	Richmond Park SAC Wimbledon Common SAC South West London	Mitigation is provided by Policies LP 15 Biodiversity; LP 12 Green infrastructure; LP 23 Water resources and	No - This site alone will not contribute to a significant increase in air pollution or recreation impacts. The potential for air pollution or recreation impacts in combination with other

	Likely activities (operation) to result as a consequence of the proposal	Likely effects if proposal implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the proposal have likely significant effects on European sites (taking mitigation into account)?
	water treatment		Waterbodies SPA	infrastructure; LP 21 Flood risk and sustainable drainage; Policy LP 31 Public open space, play space, sport and recreation; LP 44 Facilitating sustainable travel choices; LP 45 Parking standards and servicing; and LP 24 Waste management.	<p>developments is considered within the assessment of overall development (LP 34 New Housing, LP 40 Employment and local economy).</p> <p>This site is not within a European site and lies more than 500m from a European site. Non-physical disturbance can therefore be screened out.</p> <p>This site does not support significant wetland habitat (and therefore SPA bird species) and stag beetles have not been recorded in or near this site. Development of this site will therefore not cause physical loss of or damage to habitats functionally linked to the European sites.</p> <p>Planned upgrades, regulatory mechanisms and Policy LP 23 provide sufficient safeguards against significant water quantity and quality effects.</p>
SA 22: Pools on the Park and surroundings, Old Deer Park, Richmond	None - refurbishment and replacement of existing facilities within existing footprint of the site.	n/a	n/a	n/a	n/a
SA 23: Richmond Athletic Association	None - refurbishment and replacement of	n/a	n/a	n/a	n/a

	Likely activities (operation) to result as a consequence of the proposal	Likely effects if proposal implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the proposal have likely significant effects on European sites (taking mitigation into account)?
Ground, Old Deer Park, Richmond	existing facilities within existing footprint of the site.				
SA 24: Stag Brewery, Lower Richmond Road, Mortlake	Residential development Employment development Social and community infrastructure development Increase in vehicle traffic Increase in recreational pressure Increased demand for water treatment	Impacts of recreation Water quality and quantity Air pollution	Richmond Park SAC Wimbledon Common SAC South West London Waterbodies SPA	Mitigation is provided by Policies LP 15 Biodiversity; LP 12 Green infrastructure; LP 23 Water resources and infrastructure; LP 21 Flood risk and sustainable drainage; Policy LP 31 Public open space, play space, sport and recreation; LP 44 Facilitating sustainable travel choices; LP 45 Parking standards and servicing; and LP 24 Waste management.	No - This site alone will not contribute to a significant increase in air pollution or recreation impacts. The potential for air pollution or recreation impacts in combination with other developments is considered within the assessment of overall development (Policies LP 28 Social and community infrastructure, LP 29 Education and training, LP 34 New Housing, LP 40 Employment and local economy). This site is not within a European site and lies more than 500m from a European site. Non-physical disturbance can therefore be screened out. This site does not support significant wetland habitat (and therefore SPA bird species) and stag beetles have not been recorded in or near this site. Development of this site will therefore not cause physical loss of or damage to habitats functionally linked to the European sites. Planned upgrades, regulatory

	Likely activities (operation) to result as a consequence of the proposal	Likely effects if proposal implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the proposal have likely significant effects on European sites (taking mitigation into account)?
					mechanisms and Policy LP 23 provide sufficient safeguards against significant water quantity and quality effects.
SA 25: Mortlake and Barnes Delivery Office, Mortlake	Employment and retail development Increase in vehicle traffic Increase in recreational pressure Increased demand for water treatment	Impacts of recreation Water quality and quantity Air pollution	Richmond Park SAC Wimbledon Common SAC South West London Waterbodies SPA	Mitigation is provided by Policies LP 15 Biodiversity; LP 12 Green infrastructure; LP 23 Water resources and infrastructure; LP 21 Flood risk and sustainable drainage; Policy LP 31 Public open space, play space, sport and recreation; LP 44 Facilitating sustainable travel choices; LP 45 Parking standards and servicing; and LP 24 Waste management.	No - This site alone will not contribute to a significant increase in air pollution or recreation impacts. The potential for air pollution or recreation impacts in combination with other developments is considered within the assessment of overall development (LP 40 Employment and local economy). This site is not within a European site and lies more than 500m from a European site. Non-physical disturbance can therefore be screened out. This site does not support significant wetland habitat (and therefore SPA bird species) and stag beetles have not been recorded in or near this site. Development of this site will therefore not cause physical loss of or damage to habitats functionally linked to the European sites. Planned upgrades, regulatory mechanisms and Policy LP 23 provide sufficient safeguards

	Likely activities (operation) to result as a consequence of the proposal	Likely effects if proposal implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the proposal have likely significant effects on European sites (taking mitigation into account)?
					against significant water quantity and quality effects.
SA 26: Kew Biothane Plant, Mellis Avenue, Kew	Residential development Increase in vehicle traffic Increase in recreational pressure Increased demand for water treatment	Impacts of recreation Water quality and quantity Air pollution	Richmond Park SAC Wimbledon Common SAC South West London Waterbodies SPA	Mitigation is provided by Policies LP 15 Biodiversity; LP 12 Green infrastructure; LP 23 Water resources and infrastructure; LP 21 Flood risk and sustainable drainage; Policy LP 31 Public open space, play space, sport and recreation; LP 44 Facilitating sustainable travel choices; LP 45 Parking standards and servicing; and LP 24 Waste management.	No - This site alone will not contribute to a significant increase in air pollution or recreation impacts. The potential for air pollution or recreation impacts in combination with other developments is considered within the assessment of overall development (LP 34 New Housing). This site is not within a European site and lies more than 500m from a European site. Non-physical disturbance can therefore be screened out. This site does not support significant wetland habitat (and therefore SPA bird species) and stag beetles have not been recorded in or near this site. Development of this site will therefore not cause physical loss of or damage to habitats functionally linked to the European sites. Planned upgrades, regulatory mechanisms and Policy LP 23 provide sufficient safeguards against significant water quantity and quality effects.

	Likely activities (operation) to result as a consequence of the proposal	Likely effects if proposal implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the proposal have likely significant effects on European sites (taking mitigation into account)?
SA 27: Telephone Exchange and 172-176 Upper Richmond Road West, East Sheen	Residential development Employment development Social and community infrastructure development Increase in vehicle traffic Increase in recreational pressure Increased demand for water treatment	Impacts of recreation Water quality and quantity Air pollution Physical loss of or damage to habitat	Richmond Park SAC Wimbledon Common SAC South West London Waterbodies SPA	Mitigation is provided by Policies LP 15 Biodiversity; LP 12 Green infrastructure; LP 9 Floodlighting; LP 10 Local environmental impacts, pollution and land contamination; LP 22 Sustainable design; LP 23 Water resources and infrastructure; LP 21 Flood risk and sustainable drainage; Policy LP 31 Public open space, play space, sport and recreation; LP 44 Facilitating sustainable travel choices; LP 45 Parking standards and servicing; and LP 24 Waste management.	No - This site alone will not contribute to a significant increase in air pollution or recreation impacts. The potential for air pollution or recreation impacts in combination with other developments is considered within the assessment of overall development (Policies LP 28 Social and community infrastructure, LP 29 Education and training, LP 34 New Housing, LP 40 Employment and local economy). This site is not within a European site and lies more than 500m from a European site. Non-physical disturbance can therefore be screened out. This site does not support significant wetland habitat (and therefore SPA bird species) but stag beetles have been recorded in or near this site and the site is within 2km of Richmond Park SAC. Loss of this site alone would not have a significant impact on the SAC. The potential in-combination effect of developing this site has been considered within the assessment of overall development, as above. Planned upgrades, regulatory

	Likely activities (operation) to result as a consequence of the proposal	Likely effects if proposal implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the proposal have likely significant effects on European sites (taking mitigation into account)?
					mechanisms and Policy LP 23 provide sufficient safeguards against significant water quantity and quality effects.
SA 28: Barnes Hospital, East Sheen	Social and community infrastructure development Increase in vehicle traffic Increase in recreational pressure Increased demand for water treatment	Impacts of recreation Water quality and quantity Air pollution	Richmond Park SAC Wimbledon Common SAC South West London Waterbodies SPA	Mitigation is provided by Policies LP 15 Biodiversity; LP 12 Green infrastructure; LP 23 Water resources and infrastructure; LP 21 Flood risk and sustainable drainage; Policy LP 31 Public open space, play space, sport and recreation; LP 44 Facilitating sustainable travel choices; LP 45 Parking standards and servicing; and LP 24 Waste management.	No - This site alone will not contribute to a significant increase in air pollution or recreation impacts. The potential for air pollution or recreation impacts in combination with other developments is considered within the assessment of overall development (Policies LP 28 Social and community infrastructure, LP 29 Education and training). This site is not within a European site and lies more than 500m from a European site. Non-physical disturbance can therefore be screened out. This site does not support significant wetland habitat (and therefore SPA bird species) and stag beetles have not been recorded in or near this site. Development of this site will therefore not cause physical loss of or damage to habitats functionally linked to the European sites. Planned upgrades, regulatory mechanisms and Policy LP 23

	Likely activities (operation) to result as a consequence of the proposal	Likely effects if proposal implemented	European site(s) potentially affected	Potential mitigation measures – if implemented would avoid likely significant effect	Could the proposal have likely significant effects on European sites (taking mitigation into account)?
					provide sufficient safeguards against significant water quantity and quality effects.

Appendix 4

Consultation with Natural England

Summary of Natural England comments relevant to the HRA and the response provided within the HRA report

Date of comment and document consulted on	Natural England comment	HRA response
<p>July 2014</p> <p>Draft HRA of the draft Site Allocations Plan</p>	<p>Having looked through the draft HRA for the Site Allocations document Natural England wouldn't have any major comments to make in relation to the conclusions made at this stage for the sites involved. This does of course only apply to the document as it stands for the sites assessed and wouldn't account for any future allocations or changes to policies which might affect the conclusions of no Likely Significant Effect (LSE).</p> <p>The only comments to make would be in relation to the Air Quality impacts of the allocations as these would be the most likely to have an impact out of the various possible impacts assessed. It would be good to ensure the policies in the development management plan around Cycling and Public Transport (for instance), mentioned in paragraph 4.24 of the draft report, are strengthened to ensure they would account for any future changes in baseline figures if changes are reported from monitoring stations for instance. The inclusion of a reference to the National Planning Policy Framework (NPPF) – for instance paragraph 124, in the report would help to strengthen the case for it being in line with European Union (EU) policy with relation to Air Quality impacts and also from a soundness point of view later on when the plan goes to examination.</p>	<p>The Publication Local Plan HRA has been based on the fully updated policies and site allocations</p>
<p>July 2014</p> <p>Pre-Publication Site Allocations Plan – new additional sites</p>	<p>Having also recently checked the Habitats Regulations Assessment (HRA) of these sites it is clear that there aren't any major issues which would need raising at this stage with regard to their proposed uses or their siting.</p>	<p>Noted</p>
<p>August 2016</p> <p>Pre-Publication Local Plan Sustainability Appraisal</p>	<p>We note that no reference is made to a Habitats Regulations Assessment (HRA). The Local Plan should be screened under Regulation 102 of the Conservation of Habitats and Species Regulations 2010 (as amended) at an early stage so that outcomes of the assessment can inform key decision making on strategic options and development sites. It may be necessary to outline avoidance and/or mitigation measures at the plan level, including a clear direction for project level HRA work to ensure no adverse effect on the integrity of internationally designated sites. It may also be necessary for plans to provide policies for strategic or cross boundary approaches, particularly in areas where designated sites cover more than one Local Planning Authority boundary.</p>	<p>A HRA of the full Local Plan has been carried out. Natural England was consulted prior to the preparation of the HRA Report and the approach was agreed (see row below).</p>

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	<p>Natural England would welcome early discussion on the HRA of the plan and can offer further advice as policy options are progressed. As discussed above, it will be particularly important to ensure the effects of longer-ranging impacts, such as through air and water mediated effects and recreational pressure, are fully considered for policies and allocations alone, and in-combination, and that sufficient mitigation is identified to address any adverse effects.</p>	
<p>November 2016 Publication Local Plan HRA</p>	<p>From: Harries, Sally (NE) Sent: 16 November 2016 17:18 To: Katherine Sydney (LUC) Subject: Richmond HRA</p> <p>Dear Katherine</p> <p>I've looked through the previous HRA supplied and am satisfied that this can be used as a foundation for the updated version. Having contacted the responsible officers for the European sites within the zone of consideration for Richmond upon Thames no new issues have been highlighted. Recreational pressure, air quality and long term maintenance are among the pressing issues.</p> <p>I hope that helps; do contact me if you have any other queries.</p> <p>Kind Regards Sally Harries Sustainable Development Thames Team</p>	<p>The Site Allocations DPD HRA has been used as the foundation for this Publication Local Plan HRA.</p>