

# **Habitats Regulations Assessment**

Screening Report

April 2015

Minor Alterations to the London Plan

**PARKING STANDARDS**

**MAYOR OF LONDON**

# 1 Introduction

- 1.1 This Habitats Regulations Assessment (HRA) has been developed to inform the Parking Standards Minor Alteration to the London Plan (MALP) which proposes to amend London Plan Policy 6.13 - Parking. The proposed Parking Standards MALP is a focused alteration on residential parking standards in low PTAL areas in outer London. It follows a commitment made by the Mayor to the Parliamentary Under Secretary of State (Planning) at the Department of Communities and Local Government prior to the publication of the Further Alterations to the London Plan (FALP) in March 2015. This HRA enables a review of this alteration with a view to protecting European Nature Conservation Sites.

## Habitats Regulation Assessment

- 1.2 Regulation 102 of the Conservation of Habitats and Species Regulations 2010 (as amended) (the 'Habitats Regulations') requires that competent authorities assess the effects of land use plans on European sites<sup>1</sup> to determine whether there will be any 'likely significant effects' (LSEs) on any European sites as a result of the plan's implementation (either on its own or 'in combination' with other plans or projects); if there are LSEs, there will be a need for the competent authority to undertake an Appropriate Assessment to determine whether or not there will be any adverse effects on the sites' integrity. The process by which the effects on European sites of a plan (or project or programme) are assessed is widely referred to (as in this report) as 'Habitats Regulations Assessment' (HRA).
- 1.3 Amendments to a plan must also be subject to HRA to ensure that the plan remains compliant and that those amendments do not introduce new or additional impacts, or make otherwise 'not significant' effects 'significant'. The Mayor has a statutory duty to prepare the London Plan and is therefore the 'competent authority' for this HRA.
- 1.4 Regulation 102 essentially provides a test that the final London Plan must pass. There is no requirement for HRA to be undertaken on draft plans or similar developmental stages. However, as with SEA, it is widely accepted best-practice for HRA of strategic planning policy documents, such as the London Plan, to be run as an iterative process alongside the development of policies, with the emerging proposals or options continually assessed for their possible effects on European sites and modified or abandoned (as necessary) to ensure that the subsequently adopted plan is not likely to result in significant or adverse effects on any European sites, either alone or 'in combination' with other plans. It is therefore important to recognise that the strategic HRA is as much about guiding the development of the plan (and demonstrating that this has been done) as it is about (ultimately) assessing its effects.
- 1.5 To ensure compliance with the Regulations, a Habitats Regulations Assessment for the proposed alteration has been prepared. This report represents the findings of the first stage in this process, the Habitats Regulations Screening Assessment. The Habitats Regulations Screening Assessment will determine whether the alteration will have any

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<sup>1</sup> Strictly, 'European sites' are any Special Area of Conservation (SAC) from the point at which the European Commission and the UK Government agree the site as a 'Site of Community Importance' (SCI); any classified Special Protection Area (SPA); any candidate SAC (cSAC); and (exceptionally) any other site or area that the Commission believes should be considered as an SAC but which has not been identified by the Government. However, the term is also commonly used when referring to potential SPAs (pSPAs), to which the provisions of Article 4(4) of Directive 2009/147/EC (the new wild birds directive) are applied; and to possible SACs (pSACs) and listed Ramsar Sites, to which the provisions of the Habitats Regulations are applied a matter of Government policy (NPPF para 118) when considering development proposals that may affect them. 'European site' is therefore used in this report in its broadest sense, as an umbrella term for all of the above designated sites.

likely significant effects on European sites, both alone, and in combination<sup>2</sup> with other plans, schemes and projects. Where this cannot be concluded at this stage due to a lack of development detail, recommendations for the likely scope of lower tier assessment are provided. In addition, consideration will be given to in-combination effects with other plans and projects where possible at this stage. This screening report builds on that<sup>3</sup> prepared for the replacement London Plan which was published in July 2011 and especially that prepared for the FALP<sup>4</sup> (December 2013) which also included changes to the London Plan car parking policy.

#### The proposed Parking Standards Minor Alteration to the London Plan

- 1.6 It is proposed to amend London Plan policy 6.13 - Parking by adding text which encourages outer London boroughs to promote more generous car parking standards for housing developments in low (0-1) PTAL areas, subject to specific criteria.

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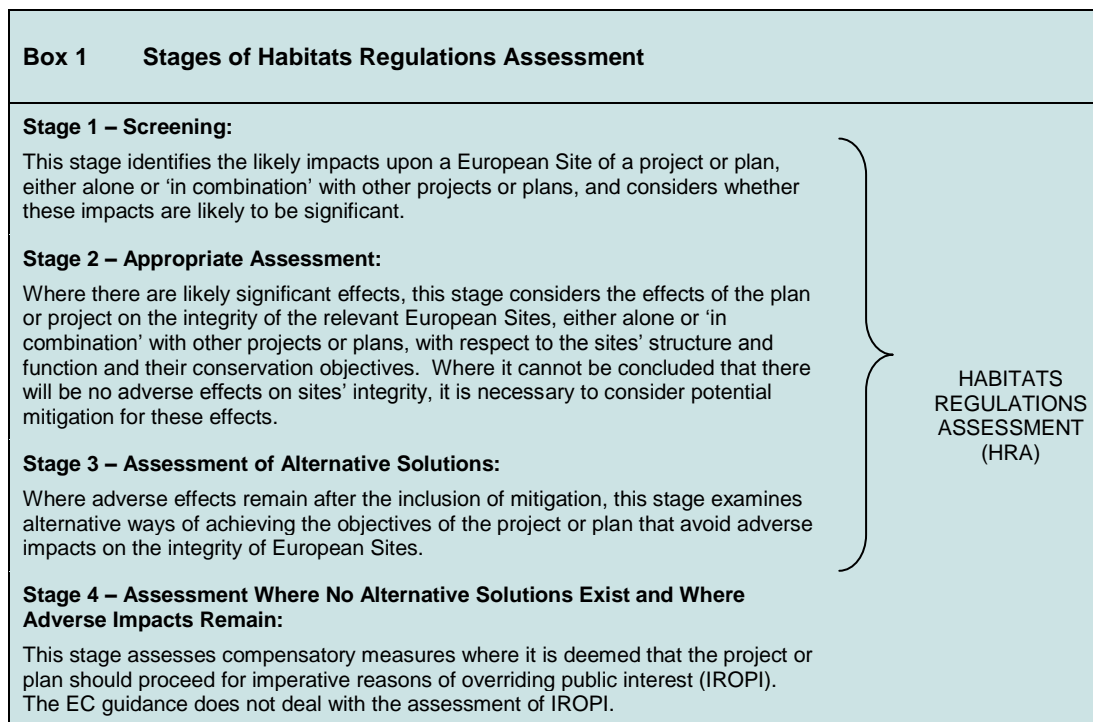
<sup>2</sup> Article 6.3 of the Habitats Regulations (as amended).

<sup>3</sup> Habitats Regulations Assessment Screening Report. October 2009, Mayor of London.

<sup>4</sup> Habitats Regulations Assessment Screening Report. December 2013, Mayor of London

## 2 Approach to the Habitats Regulations Screening Assessment

- 2.1 The Habitats Regulations Screening Assessment comprises a number of stages as described below and takes account of relevant published guidance, including the draft guidance produced by Natural England<sup>5</sup>. Box 1 sets out the Stages of Habitats Regulations Assessment.



- 2.2 The Habitats Regulations Screening Assessment was undertaken in the following stages:

- A review of the available data on European sites in the GLA area and a surrounding buffer of 15 km;
  - the locations of each European site, which are illustrated in Annex 1;
  - an understanding of the qualifying interest features (habitats and species for which the site is designated) of the European sites with a focus on the types of habitats and species that they are designated for (Table 3.1); and
  - the key sensitivities / vulnerabilities of each habitat type / species, and the current condition status of the sites together with current known threats across the London area (Table 3.1).
- Identification of key risk areas at the pre-screening stage to feed into GLAs drafting of new policies (Table 3.1).
- A review of the alteration to assess the potential to affect European sites, and whether the European sites are vulnerable to the effects. This has included assigning each of the policies/proposals to categories described in the Natural England draft guidance (section 4).

<sup>5</sup> Revised Draft Guidance. The Habitats Regulations Assessment of Local Development Documents. David Tyldesley and Associates for Natural England, January 2009.

- Determine whether any of the European sites could be affected by policies or proposals in relation to the alteration in combination with those from other plans, including the London Plan or projects (section 4).
- Where potential effects on European sites are identified, the report recommends changes, or other measures (i.e. mitigation, lower tier assessment) to avoid likely significant effects on European sites (section 4).

2.3 The proposed alteration promotes the appropriate level of residential car parking provision, in outer London, where public transport accessibility is low. In some circumstances a lower tier assessment will be more appropriate in assessing the potential effects on European sites and also in protecting their integrity, once more detail on the proposals is available. Where the Habitats Regulations Screening Assessment has concluded that the effects of a policy should be more appropriately addressed through a lower tier assessment, this has been done by adopting a precautionary approach (i.e. cannot conclude no likely significant effect) in accordance with the Natural England guidance and ensuring that the criteria therein apply and that adverse effects on integrity will be avoided. This approach is described in the draft Natural England guidance:

*“It will be appropriate to consider relying on the Habitats Regulations Assessments of lower tier plans, in order for a LPA to ascertain a higher tier plan would not have an adverse effect on the integrity of a European site, only where:*

- A) The higher tier plan assessment cannot reasonably assess the effects on a European site in a meaningful way; whereas*
- B) The Habitats Regulations Assessment of the lower tier plan, which will identify more precisely the nature, scale or location of development, and thus its potential effects, will be able to change the proposal if an adverse effect on site integrity cannot be ruled out, because the lower tier plan is free to change the nature and/or scale and/or location of the proposal in order to avoid adverse effects on the integrity of any European site (e.g. it is not constrained by location specific policies in a higher tier plan); and*
- C) The Habitats Regulations Assessment of the plan or project at the lower tier is required as a matter of law or Government policy.*

2.4 In such cases the assessment has indicated what further assessment is likely to be necessary as part of the lower tier assessment.

*“There is a need to focus the Habitats Regulations Assessment of LDDs on the strategy, policies and proposals directly promoted by the LDD, and not all and every proposal for development and change, especially where these are planned and regulated through other statutory procedures which will be subject to a Habitats Regulations Assessment.”*

### 3 Baseline information - European Sites

- 3.1 The scope of this assessment includes all of the 12 European sites that are:
- within the GLA boundary (2 sites)
    - Richmond Park SAC;
    - Wimbledon Common SAC, or
  - partially within (3 sites)
    - Lea Valley SPA/Ramsar;
    - Epping Forest SAC;
    - the South West London Waterbodies SPA/Ramsar, and
  - within a 15 km buffer of the boundary (7 sites) (listed in Table 3.1 and shown on Annex 1).
- 3.2 Table 3.1 provides a description of the European protected sites that need to be taken into consideration in the Habitats Regulations Screening Assessment. This includes information on the following elements which are explained below:
- conservation objectives;
  - key site sensitivities;
  - current condition; and
  - threats.
- 3.3 Conservation objectives are set by Natural England to ensure that the obligations of the Habitats Regulations are met, particularly to ensure that there should be no deterioration or significant disturbance of the qualifying features from their condition at the time the status of the site was formally identified. The conservation objectives are also essential in determining whether the effects of a plan or project are likely to have a significant effect<sup>6</sup> on the qualifying interests of the site.
- 3.4 For Special Areas of Conservation (SACs) – Avoid the deterioration of the qualifying natural habitats and the habitats of qualifying species, and the significant disturbance of those qualifying species, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving Favourable Conservation Status of each of the qualifying features. Subject to natural change, to maintain or restore:
- The extent and distribution of qualifying natural habitats and habitats of qualifying species;
  - The structure and function (including typical species) of qualifying natural habitats and habitats of qualifying species;
  - The supporting processes on which qualifying natural habitats and habitats of qualifying species rely
  - The populations and distribution of qualifying species within the site.
- 3.5 For Special Protection Areas (SPAs) – Avoid the deterioration of the qualifying features, and the significant disturbance of the qualifying features, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving the aims of the Birds directive. Subject to natural change, to maintain or restore:
- The extent and distribution of qualifying natural habitats and habitats of qualifying species;
  - The structure and function (including typical species) of qualifying natural habitats and habitats of qualifying species;
  - The supporting processes on which qualifying natural habitats and habitats of qualifying species rely

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8 Article 6.2 of the Habitats Directive

- The populations and distribution of qualifying species within the site.
- 3.6 For Ramsar sites – the objectives are taken to be the same as for the corresponding SACs/SPAs (where sites overlap).
- 3.7 The key site sensitivities / vulnerabilities for each habitat type were taken from those identified in the HRA Screening report for the Further Alterations, the most recent assessment (December 2013) and updated where required. The sensitivities were established by reviewing information provided within the conservation objectives for each site and also from site condition monitoring (typically of the underlying Site of Special Scientific Interest (SSSI) designation).

### **Summary of the Main Sensitivities of and Key Threats to the European Sites**

- 3.8 Table 3.1 contains details of the known sensitivities / vulnerabilities of the European sites. The following sections summarise the effects which could be relevant to the proposals in relation to the alteration.

#### **Key Threats**

- 3.9 No direct land take from European sites is proposed by the alteration. Any such land take would be contrary to the aims and objectives of the National Planning Policy Framework and London Plan policies, specifically policy 7.19.
- 3.10 The main links between the alteration and known sensitivities of European designated sites are focused on secondary effects. Secondary effects include air pollution arising from the use of vehicles, in close proximity to the sites, or in combination with air emissions from other sources:
  - Epping Forest SAC – existing air pollution, particularly arising from traffic is thought to contribute to poor condition of parts of the site; and
  - Wimbledon Common – air pollution is thought to be having an impact on heathland habitat.
- 3.11 Any significant proposal for housing in low PTAL areas in outer London would be subject to local or London Plan policies that seek developments to be air quality neutral (see Policy 7.14 of the London Plan). The specific need for avoidance of likely adverse effects on the integrity of European sites is addressed through the overarching policy 7.19. In addition the Mayor has an Air Quality Strategy which addresses air quality issues in London.

Table 3.1

## European Site Information (listed by proximity to GLA boundary)

<http://www.naturalengland.org.uk/ourwork/conservation/designatedareas/sac/conservationobjectives.aspx>

Natura 2000 Site	Location	Qualifying Interest (Habitats and Species)	Conservation Objectives	Site Sensitivities	Current Condition (2013 condition survey)	Threats
Richmond Park SAC  (846.68 ha)	Within GLA boundary  The following boroughs are within or adjacent to the European sites:  <ul style="list-style-type: none"> <li>• <b>Richmond upon Thames</b></li> <li>• <b>Kingston upon Thames</b></li> <li>• <b>Wandsworth</b></li> <li>• <b>Merton</b></li> </ul>	<ul style="list-style-type: none"> <li>• <i>Lucanus cervus</i> (stag beetle)</li> </ul>	<p>The conservation objectives for the European interest on the SSSI are:</p> <p>to maintain, in favourable condition, the habitats for the population of:</p> <ul style="list-style-type: none"> <li>• Stag beetle (<i>Lucanus cervus</i>)</li> </ul> <p>The conservation objectives for the Richmond Park proposed Special Area of Conservation are, in accordance with para C 10 of PPG 9, the reasons for which the cSAC was proposed.</p>	<p>Water level</p> <p>Water quality – nutrient enrichment from fertiliser run-off etc</p> <p>Scrub encroachment (often due to undergrazing)</p> <p>Development pressure</p> <p>Spread of introduced non-native species</p> <p>Human disturbance (off-road vehicles, burning (vandalism))</p> <p>Atmospheric pollution e.g. nitrous oxides from vehicle exhausts</p>	Area unfavourable recovering 100%	Site is surrounded by urban areas and experiences high levels of recreational pressure. This does not directly affect the European interest feature however.
Wimbledon Common SAC  (348.31 ha)	Within GLA boundary  The following boroughs are within or adjacent to the European sites: <ul style="list-style-type: none"> <li>• <b>Merton</b></li> <li>• <b>Wandsworth</b></li> <li>• <b>Richmond upon Thames</b></li> <li>• <b>Kingston upon Thames</b></li> </ul>	<p><i>Lucanus cervus</i> (stag beetle)</p> <p>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:</p> <ul style="list-style-type: none"> <li>• Northern Atlantic wet heaths with <i>Erica tetralix</i></li> <li>• European dry heaths</li> </ul>	<p>The conservation objectives for the European interest on the SSSI are</p> <p>to maintain*, in favourable condition, the:</p> <ul style="list-style-type: none"> <li>• European dry heath</li> <li>• Northern Atlantic wet heath with <i>Erica tetralix</i></li> </ul> <p>to maintain*, in favourable condition, the habitats for the population of:</p> <ul style="list-style-type: none"> <li>• Stag beetle (<i>Lucanus cervus</i>)</li> </ul> <p>* Maintenance implies restoration if the feature is not currently in favourable condition.</p>	<p>Water quality – e.g. pollution through groundwater and surface run-off sources</p> <p>Water level – maintenance of water table</p> <p>Heavy recreational pressure</p> <p>Spread of non-native / invasive species</p> <p>Scrub encroachment</p> <p>Atmospheric pollution (nutrient deposition and acidification)</p>	Area unfavourable declining 5% Area unfavourable but recovering 95%	<p>Site is located in an urban area and experiences intensive recreational pressure which can result in damage, particularly to the sensitive areas of heathland.</p> <p>Air pollution is also thought to be having an impact on the quality of heathland habitat.</p>



Natura 2000 Site	Location	Qualifying Interest (Habitats and Species)	Conservation Objectives	Site Sensitivities	Current Condition (2013 condition survey)	Threats
Epping Forest SAC  (1604.95 ha)	Partially within GLA boundary  The following boroughs are within or adjacent to the European sites:  • <b>Waltham Forest</b> • <b>Redbridge</b> • <b>Enfield</b>	Annex I habitats that are a primary reason for selection of this site: • Atlantic acidophilous beech forests with <i>Ilex</i> and sometimes also <i>Taxus</i> in the shrub layer ( <i>Quercion robur-petraeae</i> or <i>Ilici-Fagenion</i> )  Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site: • Northern Atlantic wet heaths with <i>Erica tetralix</i> • European dry heaths  Annex II species that are a primary reason for selection of this site: • <i>Lucanus cervus</i> (stag beetle)	The Conservation Objectives for this site are, subject to natural change, to maintain the following habitats and geological features in favourable condition, with particular reference to any dependent component special interest features (habitats, vegetation types, species, species assemblages etc.) for which the land is designated (SSSI, SAC, SPA, Ramsar) as individually listed in Table 1.  Habitat Types represented (Biodiversity Action Plan categories) • Lowland wood pastures and parkland • Broadleaved, mixed and yew woodland • Dwarf shrub heath • Acid grassland • Neutral grassland • Standing open water and canals • Fen, marsh and swamp	Water quality – e.g. pollution through groundwater and surface run-off sources  Water level – maintenance of water table essential e.g. restrict new drainage ditches around wet woodlands  Heavy recreational pressure  Spread of non-native / invasive species  Scrub encroachment  Atmospheric pollution (nutrient deposition and acidification)  Development pressure	Area favourable 37% Area unfavourable recovering 45% % area unfavourable no change 16% % area unfavourable declining 2%  Reintroduction of pollarding and wood pasture management is helping to reverse the decline of the epiphytic bryophyte population.	Existing air pollution, particularly arising from traffic is thought to contribute to poor condition of parts of the site.  Increasing recreational pressure could have an impact on heathland areas.
Lee Valley SPA / Ramsar  (447.87 ha)	Partially within GLA boundary  The following boroughs are within or adjacent to the European sites:  • <b>Enfield</b> • <b>Waltham Forest</b> • <b>Haringey</b> • <b>Hackney</b>	SPA: Over winter: • <i>Botaurus stellaris</i> (bittern)  Over winter: • <i>Anas strepera</i> (gadwall) • <i>Anas clypeata</i> (shoveler)  Ramsar: The site also qualifies as a Ramsar Wetland of assemblage qualification:	The conservation objectives for the European interest on the SSSI are to maintain, in favourable condition, the habitats for the populations of migratory bird species + of European importance, with particular reference to: • open water and surrounding marginal habitats • Gadwall, Shoveler  *maintenance implies restoration if the feature is	Water quality – eutrophication is a threat, particularly from point source pollution (e.g. sewage outfalls) but also from surface run-off or groundwater pollution and atmospheric deposition  Water levels – a high and stable water table is fundamental.  Disturbance to bird feeding and roosting habitat (noise	Amwell Quarry and Turnford and Cheshunt Pits are 100% favourable.  Rye Meads are 40% favourable and 60% unfavourable but recovering.  Walthamstow Marshes are 100% unfavourable but recovering.	Most of the site is in favourable condition, though an increase in recreational use could affect wintering wildfowl numbers.  There are currently no factors having a significant adverse effect on the site's character.

Natura 2000 Site	Location	Qualifying Interest (Habitats and Species)	Conservation Objectives	Site Sensitivities	Current Condition (2013 condition survey)	Threats
		A wetland of international importance.	not currently in favourable condition.  The Conservation Objectives for the Lee Valley SPA are, in accordance with para C 10 of PPG9 9, the reasons for which the SPA was classified.  The SPA includes land within: Amwell Quarry SSSI, Rye Meads SSSI, Turnford and Cheshunt Pits SSSI and Walthamstow Reservoirs SSSI	/ visual)  Siltation (e.g. excessive poaching of lake margins by stock, suspended sediments leading to transport of nutrients)  Scrub or tree encroachment (leading to shading, nutrient and hydrological effects)  Spread of introduced non-native species  Recreational pressure / disturbance (particularly on-water activities with potential to disturb sediment and increase turbidity in lakes)  Development pressure  Diffuse air pollution from traffic and agriculture.		
South West London Waterbodies SPA / Ramsar (828.14 ha)	Partially within GLA boundary  The following boroughs are within or adjacent to the European sites:  • <b>Hillingdon</b> • <b>Hounslow</b> • <b>Richmond upon Thames</b>	SPA: Over winter: • <i>Anas strepera</i> (gadwall) • <i>Anas clypeata</i> (shoveler)  Ramsar: The site also qualifies as a Ramsar Wetland of International Importance under the following criteria:  Criterion 6: The site supports species / populations occurring at levels of international importance:	The seven SSSIs encompassed by the South West London Waterbodies SPA / RAMSAR have shared conservation objectives with regards to European interest. They are: to maintain, in favourable condition, the habitats for the populations of migratory bird species +of European importance, with particular reference to: • open water and surrounding marginal habitats. • gadwall • shoveler	Water quality - eutrophication is a threat, particularly from point source pollution (e.g. sewage outfalls) but also from surface run-off or groundwater pollution and atmospheric deposition  Disturbance to bird feeding and roosting habitat (noise / visual)  Water levels – a high and stable water table is fundamental.  Siltation (e.g. excessive poaching of lake margins by stock, suspended sediments	This site is made up of 7 SSSIs of which the 4 are 100% favourable Knight & Bessborough, Staines Moor, Thorpe Park and Wraysbury Reservoir. 3 are 100% unfavourable but recovering Kempton Park, Wraysbury & Hithe End and Wraysbury No 1 gravel pit.	High levels of disturbance at Wraysbury gravel pits from recreational activities.  Potential for other parts of the site to be adversely affected by increased recreational pressure.

Natura 2000 Site	Location	Qualifying Interest (Habitats and Species)	Conservation Objectives	Site Sensitivities	Current Condition (2013 condition survey)	Threats
		<ul style="list-style-type: none"> <li><i>Anas clypeata</i> (shoveler)</li> <li><i>Anas strepera</i> (gadwall)</li> </ul>		<p>leading to transport of nutrients)</p> <p>Scrub or tree encroachment (leading to shading, nutrient and hydrological effects)</p> <p>Spread of introduced non-native species</p> <p>Recreational pressure / disturbance (particularly on-water activities with potential to disturb sediment and increase turbidity in lakes)</p> <p>Development pressure</p> <p>Diffuse air pollution from traffic and agriculture.</p>		
Wormley-Hoddesdonpark Woods SAC (335.53 ha)	Outside GLA boundary – approx 4 km north	<ul style="list-style-type: none"> <li>Sub-Atlantic and medio-European oak or oak-hornbeam forests of the Carpinion betuli</li> </ul>	<p>The Conservation Objectives for this site are, subject to natural change, to maintain the following habitats and geological features in favourable condition (*), with particular reference to any dependent component special interest features (habitats, vegetation types, species, species assemblages etc.) for which the land is designated (SSSI, SAC, SPA, Ramsar).</p> <p>Habitat Types represented (Biodiversity Action Plan categories)</p> <ul style="list-style-type: none"> <li>Broadleaved,</li> <li>Mixed and Yew Woodland - Lowland</li> </ul>	<p>Water quality – e.g. pollution through groundwater and surface run-off sources</p> <p>Water level – maintenance of water table</p> <p>Heavy recreational pressure</p> <p>Spread of non-native / invasive species</p> <p>Scrub encroachment</p> <p>Atmospheric pollution (nutrient deposition and acidification)</p> <p>Development pressure</p>	<p>Wormley-Hoddesdonpark South is 97% favourable, 3% unfavourable but no change. Wormley Hoddesdonpark North is 92% favourable. 7% unfavourable but recovering, 1% unfavourable no change and 1% unfavourable and declining</p>	<p>The majority of the woods are in sympathetic management with no direct threat.</p> <p>There is some pressure from recreation but mostly confined to paths.</p>
Windsor Forest and Great Park SAC	Outside GLA boundary – approx 6 km to	Large population of ancient trees on the site which combined with the	The conservation objectives for the European interest on the SSSI are:	Water quality – e.g. pollution through groundwater and surface	Area favourable 49% Area unfavourable but recovering 51%	Both invertebrate interest and oak woodland are vulnerable

Natura 2000 Site	Location	Qualifying Interest (Habitats and Species)	Conservation Objectives	Site Sensitivities	Current Condition (2013 condition survey)	Threats
(1687.26 ha)	west	<p>historical continuity of the woodland cover has resulted in Windsor forest being listed as the most important site in the UK for fauna associated with decaying timber or ancient trees.</p> <ul style="list-style-type: none"> <li>• Old acidophilous oak woods with <i>Quercus robur</i> on sandy plains</li> </ul> <p>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:</p> <ul style="list-style-type: none"> <li>• Atlantic acidophilous beech forests with <i>Ilex</i> and sometimes also <i>Taxus</i> in the shrub layer (<i>Quercion robur-petraeae</i> or <i>Illici-Fagenion</i>)</li> </ul> <p>Annex II species that are a primary reason for selection of this site:</p> <ul style="list-style-type: none"> <li>• <i>Limoniscus violaceus</i> (violet click beetle)</li> </ul>	<p>to maintain, in favourable condition, the:</p> <ul style="list-style-type: none"> <li>• European dry heath</li> <li>• Northern Atlantic wet heath with <i>Erica tetralix</i></li> </ul> <p>To maintain, in favourable condition, the habitats for the population of:</p> <ul style="list-style-type: none"> <li>• Stag beetle (<i>Lucanus cervus</i>)</li> </ul>	<p>run-off sources</p> <p>Water level – maintenance of water table</p> <p>Maintenance of appropriate grazing regime</p> <p>Heavy recreational pressure</p> <p>Spread of non-native / invasive species</p> <p>Scrub encroachment</p> <p>Atmospheric pollution (nutrient deposition and acidification)</p> <p>Development pressure</p>		<p>to changed in management practices.</p> <p>Natural England and the Crown Estate are in ongoing liaison over the continuation of sympathetic management practices.</p>
Mole Gap to Reigate Escarpment SAC (887.68 ha)	Outside GLA boundary – approx 6 km to the south	<ul style="list-style-type: none"> <li>• Stable xerothermophilous formations with <i>Buxus sempervirens</i> on rock slopes (Berberidion p.p.)</li> <li>• Semi-natural dry grasslands and scrubland facies: on calcareous substrates (<i>Festuco-Brometalia</i>)</li> <li>• Semi-natural dry grasslands and scrubland facies: on calcareous substrates (<i>Festuco-Brometalia</i>)</li> </ul>	The Conservation Objectives for this site are, subject to natural change, to maintain the following habitats and geological features in favourable condition, with particular reference to any dependent component special interest features (habitats, vegetation types, species, species assemblages etc.) for which the land is designated (SSSI, SAC, SPA, Ramsar) as individually listed in Table 1.	<p>Water quality – e.g. pollution through groundwater and surface run-off sources</p> <p>Water level – maintenance of water table</p> <p>Heavy recreational pressure</p> <p>Spread of non-native / invasive species</p> <p>Scrub encroachment</p> <p>Atmospheric pollution</p>	<p>Area favourable 46%</p> <p>Area unfavourable recovering 53%</p> <p>Area unfavourable no change 1%</p>	<p>Recreational pressure is high and requires management and monitoring.</p> <p>Small privately owned areas most at threat from neglect and lack of appropriate grazing.</p> <p>Bechstein's bats use the site throughout the year and work is being carried out to better understand the movements and requirements of bats on</p>

Natura 2000 Site	Location	Qualifying Interest (Habitats and Species)	Conservation Objectives	Site Sensitivities	Current Condition (2013 condition survey)	Threats
		<p>(important orchid sites)</p> <ul style="list-style-type: none"> <li>• <i>Taxus baccata</i> woods of the British Isles</li> <li>• European dry heaths</li> <li>• <i>Asperulo-Fagetum</i> beech forests</li> </ul> <p>Annex II species present as a qualifying feature, but not a primary reason for site selection:</p> <ul style="list-style-type: none"> <li>• <i>Triturus cristatus</i> (great crested newt)</li> <li>• <i>Myotis bechsteinii</i> (Bechstein's bat)</li> </ul>	<p>Habitat Types represented (Biodiversity Action Plan categories)</p> <ul style="list-style-type: none"> <li>• Broadleaved, Mixed and Yew Woodlands</li> <li>• Calcareous Grassland</li> <li>• Dwarf Scrub Heath</li> </ul>	<p>(nutrient deposition and acidification)</p> <p>Development pressure</p>		the site.
Thames Basin Heaths SPA (linked with Thursley, Ash, Pirbright and Chobham SAC)  (8274.72 ha)	Outside GLA boundary – approx 8 km to southwest	<p>During the breeding season:</p> <ul style="list-style-type: none"> <li>• <i>Sylvia undata</i> (Dartford warbler)</li> <li>• <i>Caprimulgus europaeus</i> (nightjar)</li> <li>• <i>Lullula arborea</i> (woodlark)</li> </ul>	<p>Nightjar (<i>Caprimulgus europaeus</i>)</p> <ul style="list-style-type: none"> <li>• Maintain the population above 198 pairs (75%). A loss of 66 pairs (25%) or more is unacceptable</li> </ul> <p>Woodlark (<i>Lullula arborea</i>)</p> <ul style="list-style-type: none"> <li>• Maintain the population above 112 pairs (75%). A loss of 37 pairs (25%) or more is unacceptable.</li> </ul> <p>Dartford Warbler (<i>Sylvia undata</i>)</p> <ul style="list-style-type: none"> <li>• Maintain the population above 334 pairs (75%). A loss of 111 pairs (25%) or more is unacceptable.</li> </ul> <p>Outstanding breeding bird community</p> <ul style="list-style-type: none"> <li>• Maintain assemblage diversity: If the total score calculated for a breeding bird assemblage falls by the equivalent of 25% (4.6 points) or more in points then the assemblage is in unfavourable condition.</li> </ul>	<p>Water quality – e.g. pollution through groundwater and surface run-off sources</p> <p>Water level – maintenance of water table essential</p> <p>Disturbance to bird feeding and roosting habitat (noise / visual)</p> <p>Heavy recreational pressure</p> <p>Spread of non-native / invasive species</p> <p>Scrub encroachment</p> <p>Atmospheric pollution (nutrient deposition and acidification)</p> <p>Development pressure</p>	<p>Chobham Common of which 86% is unfavourable but recovering, 14% favourable.</p> <p>Horsell Common: 17% favourable; 83% unfavourable recovering.</p> <p>Ockham &amp; Wisley Commons: 39% favourable and 61% unfavourable but recovering.</p>	<p>The lowland heathlands are dependent on active management. Therefore a lack of traditional management can pose a threat.</p> <p>Of particular importance in this area is the threat of development pressure, particularly housing on neighbouring land which results in increased recreational use of the sensitive heathlands.</p>

Natura 2000 Site	Location	Qualifying Interest (Habitats and Species)	Conservation Objectives	Site Sensitivities	Current Condition (2013 condition survey)	Threats
Thursley, Ash, Pirbright and Chobham SAC (linked with the Thames Basin Heaths SPA)  (5138 ha)		<ul style="list-style-type: none"> <li>Northern Atlantic wet heaths with <i>Erica tetralix</i></li> <li>European dry heaths</li> <li>Depressions on peat substrates of the <i>Rhynchosporion</i></li> </ul>	<p>Maintain in a favourable condition the following:</p> <p>Northern Atlantic wet heaths with <i>Erica tetralix</i></p> <ul style="list-style-type: none"> <li>for which this is considered to be one of the best areas in the United Kingdom.</li> </ul> <p>European dry heaths</p> <ul style="list-style-type: none"> <li>for which this is considered to be one of the best areas in the United Kingdom.</li> </ul> <p>Depressions on peat substrates of the <i>Rhynchosporion</i></p> <ul style="list-style-type: none"> <li>for which this is considered to be one of the best areas in the United Kingdom.</li> </ul>	<p>Water quality – e.g. pollution through groundwater and surface run-off sources</p> <p>Water level – maintenance of water table essential</p> <p>Spread of non-native / invasive species</p> <p>Scrub encroachment</p> <p>Atmospheric pollution (nutrient deposition and acidification)</p> <p>Development pressure</p>	<p>14% favourable, 86% unfavourable but recovering.</p>	<p>The mosaic of habitats across this large and varied site is largely dependent on active heathland management.</p> <p>Insufficient grazing or other traditional practices, including bracken control and scrub clearance, is therefore a serious potential threat, as is lowering of water tables as a result of water abstraction or other reasons which could cause loss or damage to wet heath and mire communities.</p> <p>Grazing trials have been established on several parts of the site with great success, but currently extensive grazing is absent from much of the site.</p> <p>The indirect effects of neighbouring housing developments pose a potential long-term problem. Measures are needed to address recreational pressures, including disturbance to wildlife and fires resulting from arson, which may pose a serious risk to habitats and some species.</p>
Burnham Beeches SAC  (382.76 ha)	Outside GLA boundary – approx 9 km to the west	<ul style="list-style-type: none"> <li>Atlantic acidophilous beech forests with <i>Ilex</i> and sometimes also <i>Taxus</i> in the shrub</li> </ul>	The conservation objectives are focussed on the component Site of Special Scientific Interest (SSSI).	Water quality – e.g. pollution through groundwater and surface run-off sources	63% is favourable, 37% unfavourable but recovering.	Possible damaging influences from adjacent mineral workings such as dust and hydrological

Natura 2000 Site	Location	Qualifying Interest (Habitats and Species)	Conservation Objectives	Site Sensitivities	Current Condition (2013 condition survey)	Threats
		layer ( <i>Quercion robur-petraeae</i> or <i>Ilici-Fagenion</i> )	<p>The Conservation Objectives for this site are, subject to natural change, to maintain the following habitats and geological features in favourable condition:</p> <ul style="list-style-type: none"> <li>Lowland mixed broadleaf woodland (W10, W14, W15 Oak and Beech woodland)</li> </ul> <p>To maintain the designated habitats in favourable condition, which is defined in part in relation to a balance of habitat extent (extent attribute). Favourable condition is defined at this site in terms of the following site-specific standards</p> <p>The site includes blocks of conifers and broadleaved plantations. The objective is to remove these over time and to promote natural woodland composition and structure. Small-scale clearance of woodland to restore habitats of greater nature conservation value is likely to be acceptable.</p>	<p>Water level – maintenance of water table essential e.g. restrict new drainage ditches around wet woodlands</p> <p>Heavy recreational pressure</p> <p>Spread of non-native / invasive species</p> <p>Scrub encroachment</p> <p>Atmospheric pollution (nutrient deposition and acidification)</p> <p>Development pressure</p>		changes.
Thames Estuary and Marshes SPA/ Ramsar (4838.94/5589 ha)	Outside GLA boundary - approx 14 km to east	<p>SPA:</p> <ul style="list-style-type: none"> <li><i>Recurvirostra avosetta</i> (avocet)</li> <li><i>Circus cyaneus</i> (hen harrier)</li> <li><i>Charadrius hiaticula</i> (ringed plover)</li> </ul> <p>Ramsar: The site also qualifies as a Ramsar Wetland of</p>	<p>The conservation objectives for the European interests on the SSSI are : to maintain in favourable condition, the habitats for the populations of Annex 1 bird species of European importance, with particular reference to:</p> <ul style="list-style-type: none"> <li>Intertidal mudflats</li> <li>Intertidal saltmarsh</li> </ul>	<p>Water quality – pollution</p> <p>Recreational/tourism disturbance</p> <p>Development e.g. dock/harbour creation, coastal defence works</p> <p>Erosion</p>	<p>South Thames estuary and Marshes site is 96% favourable, 2% unfavourable but recovering, 3% unfavourable but declining. Mucking Flats is 100% favourable.</p>	<p>Dredging Erosion (North Kent Coastal Management Habitat plan has been produced). The EA is producing a Flood Defence Strategy and future management will need to take into account the effects on the designated sites.</p>

Natura 2000 Site	Location	Qualifying Interest (Habitats and Species)	Conservation Objectives	Site Sensitivities	Current Condition (2013 condition survey)	Threats
		assemblage qualification: A wetland of international importance.	<ul style="list-style-type: none"> <li>• avocet, hen harrier</li> </ul> <p>To maintain in favourable condition the habitats for the populations of migratory bird species + of European importance, with particular reference to:</p> <ul style="list-style-type: none"> <li>• Intertidal mudflats</li> <li>• Intertidal saltmarsh</li> <li>• Intertidal shingle</li> <li>• ringed plover, grey plover, dunlin, knot, black-tailed godwit, redshank</li> </ul>	<p>Siltation</p> <p>Dredging</p> <p>Over-fishing</p> <p>Maintenance of appropriate grazing regime</p> <p>Spread of non-native species</p> <p>Disturbance to bird feeding and roosting habitat (noise / visual)</p>		Water quality and sources are subject to further investigation by the EA. There are general human disturbances.



#### 4 Screening and Assessment of policies for likely significant effects

- 4.1 This section presents the findings of a screening assessment of the proposed Parking Standards MALP to determine its potential to generate likely significant effects on European sites.
- 4.2 As part of the FALP, Policy 6.13 on car parking was amended to allow greater flexibility for residential parking in outer London. This was achieved via a cross reference to Policy 2.8 on outer London. The HRA screening report produced by AMEC Ltd (December 2013, pg23) assessed that:
- “The change is minor but arguably weakens policy 6.13 with regard to parking provision. If the net effect is to increase provision in some areas this may encourage an increase in car use over public transport which could theoretically effect European sites that are sensitive to change in in air quality sensitive (**Epping Forest SAC; Wimbledon Common SAC**).”*
- 4.3 The HRA Screening report recommended that:
- “Policy [via policy 2.8] should be referenced in overarching Policy 7.19 to avoid LSE”.*
- 4.4 Policy 2.8 is referenced in the London Plan policy 7.19.
- 4.5 The proposed Parking Standards MALP will result in a further liberalisation of the approach to car parking in residential development in low PTAL areas in outer London. The London Development Database (LDD) data shows that on average some 2,400 dwellings were completed each year over the last decade in Outer London PTALs 0-1, representing a little under 10% of the London total. This residential development across London resulted in 194,163 spaces which is the equivalent of an average of 0.77 spaces per unit. For PTALs 0-1 in outer London, the average number of spaces per unit is 1.74 spaces per unit.
- 4.6 The evidence suggests that it is not easy to translate the number of spaces into the actual number of trips. TfL’s modelling suggests– assuming similar patterns of travel for new developments – the increase in car trips over 24hrs would be c0.8%. This suggests a marginal increase in trips. This would translate into a marginal negative effect on air quality, generally in outer London, but whether this has any effect on European sites is uncertain. The European sites are generally located in low PTAL areas in London and therefore located in areas where car ownership is higher. Therefore any potential increase in car use in and around European sites is likely to be marginal. Any significant effects will be dependent on the implementation of this policy by local authorities as well as the specific location of development, the number of car parking space provided, the nature of the occupants and any mitigation measures included. Assessment of specific affects will be carried out at the lower tier level in line with local and London Plan policies. Existing London Plan policies including 2.18 and 7.19 seek to protect biodiversity, habitats and specifically European sites. Policies on air quality 7.14, including air quality ‘neutral’ are likely to result in some mitigation measures along with those on low emissions vehicles and alternative forms of transport.
- 4.7 Given the existing cross-references in Policy 7.19 and the air quality neutral policy in Policy 7.14 no further policy alterations are considered necessary to ensure there will be no likely significant effects on European sites, including where lower tier assessments are carried out on specific development proposals.

## In combination effects

- 4.8 The 2009 HRA identified those policies which would require lower tier assessment, and hence the potential 'in combination' effects that would require assessment at the lower tier also (see Table 4.3 of the 2009 HRA). The FALP HRA did not alter those conclusions in respect of the 'alone' effects of the policy.
- 4.9 With regard to 'within plan' effects<sup>7</sup>, the potential for altered and unaltered policies to have 'in combination' effects on European sites has been reviewed and assessed, taking into account the conclusions of the 2009 and 2013 HRAs. The assessment focused on the altered policies (since these would be the 'source' of any new 'in combination' effect). In this instance the policy amendment applies specifically to low PTAL areas in outer London, where the quantum of development is not specifically defined but is likely to be limited. Although it is possible to identify a potential quantum of development through the Strategic Housing Land Availability Study, it is not possible to identify the number of car trips and their impact due to the proposed Parking Standards MALP.
- 4.10 As a result, it is not possible to explicitly identify and assess every potential 'in combination' effect between policies at this level: whilst potential effects are imaginable (e.g. limited development within low PTAL areas in outer London combined with relaxation of parking standards could theoretically affect air quality) these cannot be meaningfully assessed since the effects will depend almost entirely on how the plan is implemented at the lower tier. In these instances the potential for in combination effects are managed and avoided by the inclusion of protective policies and the identification of potential effects that need to be considered by lower tier plans (see Sections 4.4.1 – 4.4.4, and Table 4.3 of the 2009 HRA). In addition, the protective policy 7.19, and in this instance air quality neutral policy 7.14 are sufficient and appropriate to ensure that in combination effects between plan policies will not occur as a result of policy implementation. It is considered that the plan has no internal conflicts or 'in combination' effects between policies that could result in significant effects on any European sites.
- 4.11 With regard to potential 'in combination' effects with other strategic plans, the list of plans and programmes provided by the Integrated Impact Assessment (IIA) was used as a basis for identifying potential impacts. Plans that have been altered or updated since the FALP were identified and the potential for in combination effects with the proposed Parking Standards MALP considered (see Appendix 2 for a list of plans). As noted, most of the policies within the London Plan are general statements of policy or similar, and are essentially 'no effect' policies that cannot have in combination effects. The in combination assessment therefore aims to identify those aspects of the proposed Parking Standards MALP that could make 'not significant' effects in other plans significant. The proposed Parking Standards MALP are unlikely to have significant effects alone.
- 4.12 It should also be noted that plans adopted since the FALP will have also been subject to HRA, which would have necessarily included reference to the London Plan when considering 'in combination' effects. Since the proposed Parking Standards MALP will not alter the effects of the London Plan on European sites it is considered that the avoidance and mitigation measures included within the other plans, as well as the London Plan, can be relied on to ensure no 'in combination' effects.
- 4.13 In summary, it is considered that the London Plan is unlikely to have significant negative effects on any European sites in combination with any other adopted planning documents; the protective policies contained within the London Plan, and similar

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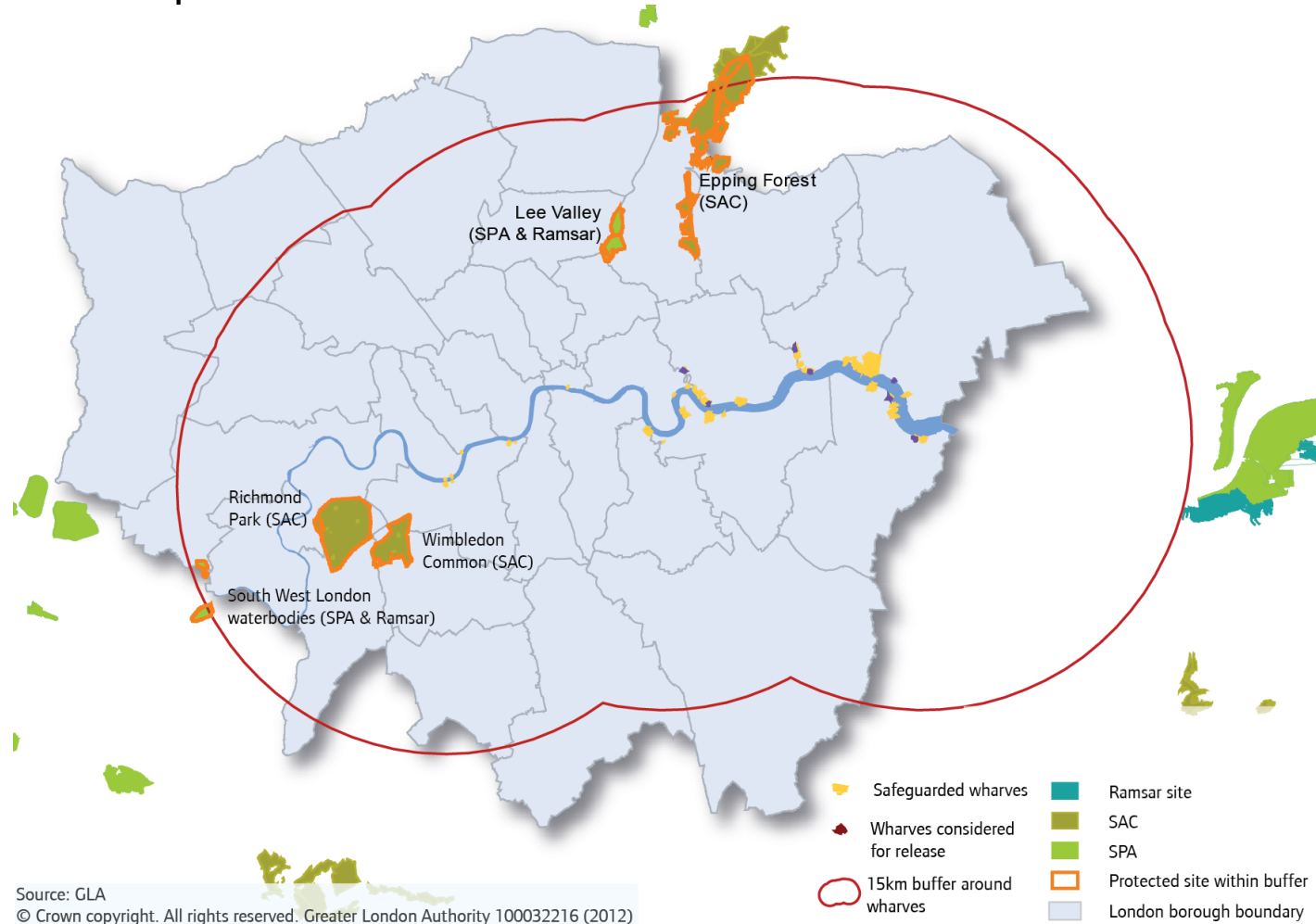
<sup>7</sup> i.e. effects between the policies of the plan, rather than with external plans or projects.

policies within other plans, will ensure this outcome, although the provisions of the 2009 and 2013 HRAs in relation to lower tier assessment remain valid.

## **5 Conclusion**

- 5.1 This assessment of the alteration has concluded there would be no likely significant effects on European sites. The main potential effects are likely to arise from increased air pollution but the evidence suggests any increase would be marginal, and it is not possible to predict the exact effect on European sites.
- 5.2 It is also noted that the London Plan and other Mayoral strategies such as the Air Quality Strategy contains a specific policy to protect European Nature Conservation Sites. Further assessment of specific development is required at the lower tier.

## Appendix 1 - European Sites within 15km of Greater London



## Appendix 2 - Reviewed Plans and Programmes

Section 5 of the Integrated Impact Assessment (IIA) Scoping Report provides a list of the plans, programmes and strategies that were reviewed as part of the IIA. Some of these plans and programmes are relevant for consideration for potential 'in combination' effects with the London Plan.

Recognising that an 'in combination' assessment was undertaken as part of the 2009 and 2013 HRA, the assessment of the proposed Parking Standards MALP has focused on those plans and programmes issued or updated since 2013 which have aspects that could operate 'in combination' with the London Plan. As with the screening of the London Plan and its policies, there are certain types of plan, programme or strategy that cannot have any effects 'alone' and which cannot therefore have 'in combination' effects. Current guidance suggests that these plans will generally be:

- general statements of policy or political intention; or
- concerned solely with the management or delivery (e.g. timing, phasing etc.) of proposals provided by another plan that has been subject to HRA; or
- concerned with the protection of European sites, including through provision of mitigation for other plan components.

It will generally be self-evident that these plans, programmes and strategies do not provide any clear mechanisms for affecting European sites. In addition, some other documents reviewed by the IIA (e.g. primary legislation; monitoring reports; etc) cannot operate 'in combination'.

Table 1 summarises the potential effects of plans developed since 2013 which could have 'in combination' effects if the proposed Housing Standards MALP are not suitably mitigated to avoid such effects. For all other plans, programmes and strategies identified by the IIA there will be no risk of 'in combination' effects for one or more of the reasons indicated above.

As noted, the review focuses on plans produced since 2013 since all plans prior to this were considered within the 2009 and 2013 HRAs, and also focuses on those plans likely to operate with the proposed Parking Standards MALP (since plans developed since 2013 will have undergone HRA themselves, which would have included the London Plan within the baseline for considering 'in combination' effects). It should be noted that the measures outlined in the 2013 HRA will be sufficient to ensure no significant effects in relation to the proposed Parking Standards MALP also, alone and in combination.

**Table 1 – Potential effect of plans and programmes**

<b>Plan, programme or strategy</b>	<b>Date</b>	<b>Possible 'in combination' effects with the proposed MALP</b>
Eric Pickles, Statement to Parliament, 25 <sup>th</sup> March 2015, including the alteration to the NPPF	2015	No. General nationwide policy that is reflected in the proposed MALP as appropriate.  The NPPF has wider policies that seek to protect European sites.
Brandon Lewis MP, Minister of State for Housing and Planning, Letter to Mayor of London Boris Johnson (FALP - publication), 27 January 2015	2015	No. General nationwide policy that is reflected in the proposed MALP as appropriate.

Brandon Lewis MP, Minister of State for Housing and Planning, Letter to Mayor of London Boris Johnson (FALP – car parking), 27 January 2015	2015	No. General nationwide policy that is reflected in the proposed MALP as appropriate.
Brandon Lewis MP, Minister of State for Housing and Planning, Letter to Mr Thickett, 10 September 2014	2014	No. General nationwide policy that is reflected in the proposed MALP as appropriate.
Nick Boles, Parliamentary Under Secretary of State (Planning), Letter to Mr Johnson, 11 April 2014	2014	No. General nationwide policy that is reflected in the proposed MALP as appropriate.
More parking for new homes will end ‘vicious cycle of clogged up streets’, Rt Hon Eric Pickles MP & Department for Communities and Local Government (DCLG), 26 August 2014	2014	No. General nationwide policy that is reflected in the proposed MALP as appropriate.
Technical consultation on planning, DCLG, 2014.	2014	No. General nationwide policy that is reflected in the proposed MALP as appropriate.
Consultation on Local Authority Parking, Department of Transport, 2013	2013	No. General nationwide policy that is reflected in the proposed MALP as appropriate.
Response to the Consultation on Local Authority Parking, Department of Transport, 2014	2014	No. General nationwide policy that is reflected in the proposed MALP as appropriate.
The Right to Challenge Parking Policies. A Discussion Paper, DCLG, 2014	2014	No. General nationwide policy that is reflected in the proposed MALP as appropriate.
Space to park, Arts and Humanities Research Council, home improvements, URBED, the University of Edinburgh, Design for Homes, art one zero.	2014	No. General design guidance.
Better streets Delivered. Transport for London, 2013	2013	Better streets Delivered. Transport for London, 2013
The vision and direction for London’s streets and roads.	2013	No. Nationwide report.

The Roads Task Force, 2013		
The Roads Task Force Update report. Mayor of London and Transport for London, 2014	2014	No. Nationwide report.