

Habitats Regulations Assessment of the Epsom and Ewell Draft Local Plan

Public Consultation: Regulation 18

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LEPUS CONSULTING
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Acronyms & Abbreviations

AA	Appropriate Assessment
AADT	Annual Average Daily Traffic
APIS	Air Pollution Information System
BCT	Bat Conservation Trust
CJEU	Court of Justice of the European Union
CSZ	Core Sustenance Zone
DfT	Department for Transport
DMRB	Design Manual for Roads and Bridges
DTA	David Tyldesley and Associates
EEC	European Economic Community
EU	European Union
EUNIS	European Nature Information System
GIS	Geographic Information System
ha	Hectares
HDV	Heavy Duty Vehicles
HRA	Habitats Regulations Assessment
IRZ	Impact Risk Zone
IUCN	International Union for Conservation of Nature
JNCC	Joint Nature Conservation Committee
LDF	Local Development Framework
LPA	Local Planning Authority
LSE	Likely Significant Effect
N	Nitrogen
NE	Natural England
NO ₂	Nitrogen Dioxide
NO _x	Nitrogen Oxides
NPPF	National Planning Policy Framework
NPPG	National Planning Practice Guidance
OAHN	Objectively Assessed Housing Need
PRoW	Public Right of Way
RBMP	River Basin Management Plan
SAC	Special Area of Conservation
SIP	Site Improvement Plan
SSSI	Site of Special Scientific Interest
STW	Sewage Treatment Work

SuDS	Sustainable Urban Drainage
SES	Sutton and East Surrey Water
UK	United Kingdom
WwTW	Waste Water Treatment Works
WFD	Water Framework Directive
WRMP	Water Resource Management Plan

1 Introduction

1.1 Epsom and Ewell Draft Local Plan

1.1.1 Epsom and Ewell Borough Council (referred to hereafter as the Council) is preparing a new Local Plan which will guide the location, scale and type of future development in the borough up to 2040. The new Local Plan will take into consideration an emerging technical evidence base, national legislation, revisions to the National Planning Policy Framework (NPPF)¹ and National Planning Practice Guidance (NPPG)².

1.1.2 Lepus Consulting has prepared this report on behalf of the Council to inform the Habitats Regulations Assessment (HRA) of the draft Local Plan consultation stage (Regulation 18)³. The Local Plan will cover the period from 2022 to 2040 and extends across the whole of the Council's administrative area (referred to hereafter as the 'Plan area' and illustrated in **Figure 1.1**).

¹ Ministry of Housing, Communities & Local Government (2019) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date Accessed: 14/12/22]

² National Planning Practice Guidance. Available at: <https://www.gov.uk/government/collections/planning-practice-guidance> [Date Accessed: 14/12/22]

³ Epsom and Ewell Borough Council. December 2022. Draft Local Plan. Regulation 18.

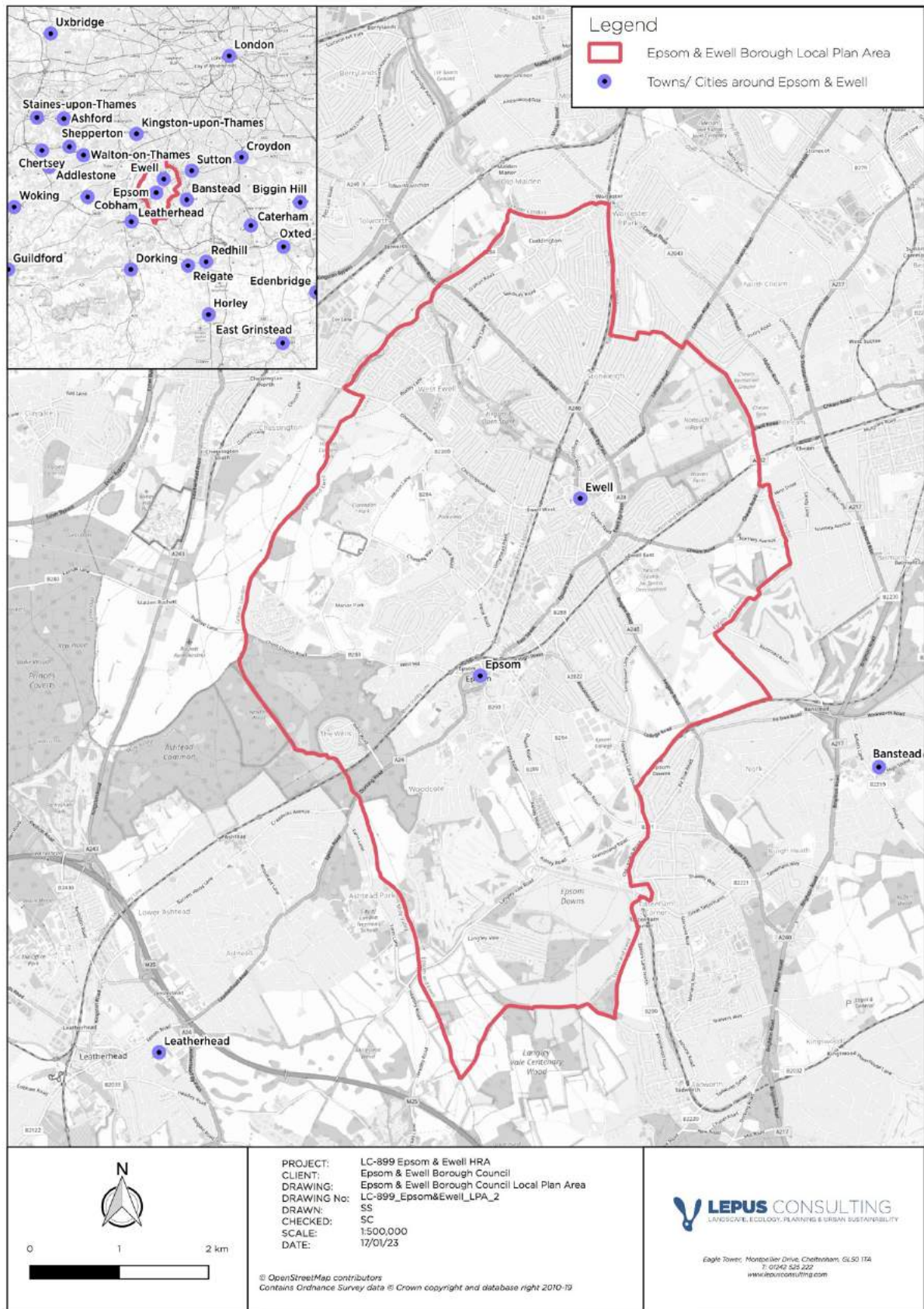


Figure 1.1: Epsom and Ewell Draft Local Plan area

Purpose of this report

- 1.1.3 The HRA has been prepared in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended)⁴, known as the Habitats Regulations. When preparing development plan documents, councils are required by law to carry out an HRA. The requirement for authorities to comply with the Habitats Regulations when preparing a Local Plan is also noted in the Government's online planning practice guidance⁵.
- 1.1.4 The purpose of this report is to inform the HRA of the Local Plan using best available information. The Council, as the Competent Authority, will have responsibility to make the Integrity Test. This can be undertaken in light of the conclusions set out in this report, having regard to representations made by Natural England under the provisions of Regulations 63(3) and 105(2) of the Habitats Regulations.

⁴ The Conservation of Habitats and Species Regulations 2017 SI No. 2017/1012, TSO (The Stationery Office), London. Available at: <https://www.legislation.gov.uk/uksi/2017/1012/contents> [Date Accessed: 14/12/22] as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. Available at: <https://www.legislation.gov.uk/ukdsi/2019/9780111176573> [Date Accessed: 14/12/22]

⁵ Ministry of Housing, Communities and Local Government (July 2019) Planning Practice Guidance Note, Appropriate Assessment, Guidance on the use of Habitats Regulations Assessment

2 Epsom and Ewell Local Plan

2.1 Local Plan Review

2.1.1 The existing Local Plan comprises three documents that have been produced by the Council. These include the following:

- The Core Strategy 2007;
- Plan E – An Area Action Plan for Epsom Town Centre 2011; and
- The Development Management Policies 2015.

2.1.2 The new Local Plan will comprise a review of policies contained within the above documents, taking into consideration current planning policy and practice guidance. The Local Plan will:

- Set out a long-term vision and objectives;
- Provide a strategy for growth, new homes, employment, facilities and infrastructure to meet the area's needs; and
- Include policies to manage change while protecting and enhancing the area's heritage and natural environment.

2.1.3 This HRA has been undertaken of the public consultation version of the draft Local Plan (Regulation 18). This version of the Local Plan builds upon consultation undertaken in late 2017, where the Council consulted on four potential options for meeting the borough's development needs identified at that time⁶. The four options included:

- Urban Intensification;
- Release some Green Belt land for new homes;
- Significant Green Belt release to meet housing need and more; and
- Finding the Balance.

⁶ Epsom and Ewell Borough Council. Local Plan Core Strategy Review – Issues and Options (2017).

3 The HRA process

3.1 Overview

3.1.1 The HRA process is used to assess the potential effects of a plan or project on the conservation objectives of sites designated under the Habitats⁷ and Birds⁸ Directives. These sites form a system of internationally important sites throughout Europe known collectively as the 'Natura 2000 Network'.

3.1.2 The Habitats Regulations⁹ provide a definition of a European site at Regulation 8. These sites include Special Areas of Conservation (SAC), Sites of Community Importance, Special Protection Areas (SPA) and sites proposed to the European Commission in accordance with Article 4(1) of the Habitats Directive. Following Brexit, UK sites which were part of the Natura 2000 Network before leaving the EU have become part of the National Site Network.

3.1.3 In addition, policy in England and Wales notes that the following sites should also be given the same level of protection as a European site¹⁰. European sites, together with sites set out in national policy (listed below), are referred to in England and Wales as a Habitats site¹¹. These include:

- A potential SPA (pSPA);
- A possible / proposed SAC (pSAC);
- Listed and proposed Ramsar Sites (Wetland of International Importance); and
- In England, sites identified or required as compensation measures for adverse effects on statutory Habitats sites, pSPA, pSAC and listed or proposed Ramsar sites.

3.1.4 HRA applies to plans or projects which are likely to have a significant effect on a Habitats site (either alone or in combination with other plans or projects), and / or not directly connected with or necessary to the management of that site. Determination of likely significant effects is undertaken via a process known as 'screening'.

⁷ Official Journal of the European Communities (1992). Council Directive 92 /43 /EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora.

⁸ Official Journal of the European Communities (2009). Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds.

⁹ Conservation of Habitats and Species Regulations 2017 SI No. 2017/1012, TSO (The Stationery Office), London. Available at: <https://www.legislation.gov.uk/uksi/2017/1012/contents> [Date Accessed: 14/12/22] as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. Available at: <https://www.legislation.gov.uk/ukdsi/2019/9780111176573> [Date Accessed: 14/12/22]

¹⁰ Ministry of Housing, Communities & Local Government (2021). National Planning Policy Framework. Para 181. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf [Date Accessed: 14/12/22]

¹¹ Habitats site: Any site which would be included within the definition at regulation 8 of the Conservation of Habitats and Species Regulations 2017 for the purpose of those regulations, including candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation, Special Protection Areas and any relevant Marine Sites. Ministry of Housing, Communities & Local Government (2021). National Planning Policy Framework. Para 181. Available in Annex 2 (Glossary) at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf [Date Accessed: 14/12/22]

- 3.1.5 It is a requirement of Regulation 63 of the Habitats Regulations that a competent authority, before deciding to undertake, or give any consent, permission or other authorisation for a plan or project, must make an appropriate assessment of the implications of the plan or project for that site in view of its site conservation objectives. These tests (screening and appropriate assessment) are referred to collectively as a Habitats Regulations Assessment (HRA).
- 3.1.6 There is no set methodology or specification for carrying out and recording the outcomes of the assessment process. The Habitats Regulations Assessment Handbook, produced by David Tyldesley Associates (referred to hereafter as the 'DTA Handbook'), provides an industry recognised good practice approach to HRA. The DTA Handbook, and in particular 'Practical Guidance for the Assessment of Plans under the Regulations'¹², which forms part F, has therefore been used to prepare this report, alongside reference to Government Guidance on Appropriate Assessment¹³.
- 3.1.7 A step-by-step guide to the methodology adopted in this assessment, based on the approach outlined in the DTA Handbook, is illustrated in **Figure 3.1**.

¹² Tyldesley, D., and Chapman, C. (2013) The Habitats Regulations Assessment Handbook (September) (2013) edition UK: DTA Publications Limited. Available at: www.dtapublications.co.uk

¹³ Government Guidance on Appropriate Assessment. July 2019. Guidance on the use of Habitats Regulations Assessment. Available at: <https://www.gov.uk/guidance/appropriate-assessment>

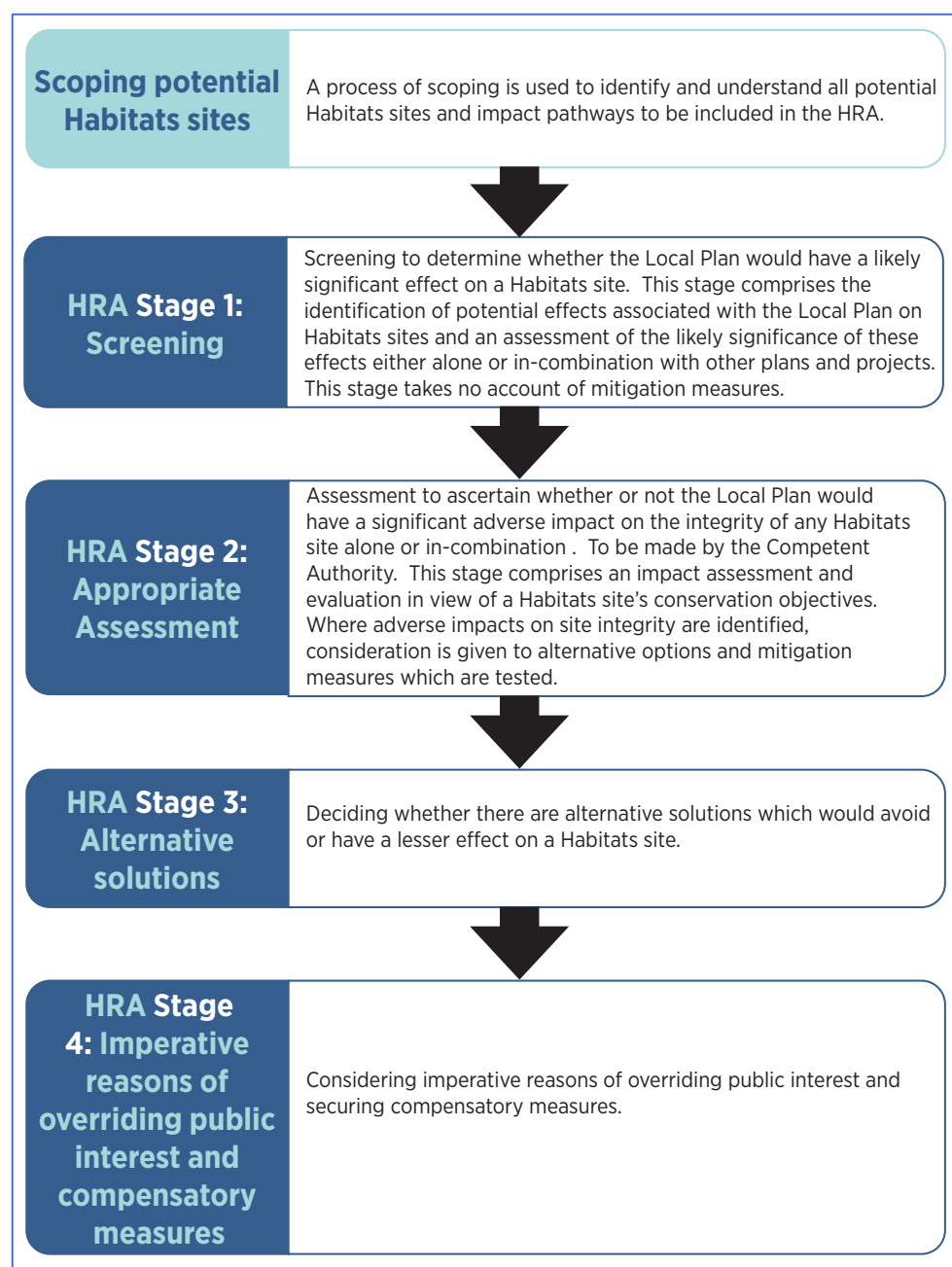


Figure 3.1: Stages in the Habitats Regulations Assessment process¹⁴

¹⁴ Tyldesley, D., and Chapman, C. (2013) The Habitats Regulations Assessment Handbook (October) (2018) edition UK: DTA Publications Limited. Available at: www.dtapublications.co.uk

3.2 Previous HRA work

3.2.1 As part of the Issues and Options element of Local Plan preparation, the Council undertook an HRA: Habitats Regulations Assessment 'Initial Screening Report for Core Strategy Review'¹⁵. The purpose of the screening report was to identify any aspects of the emerging Core Strategy review (now the Local Plan review) that would have the potential to cause a likely significant effect on a number of Habitats sites either in isolation or in combination with other plans and projects. In order to identify Habitats sites which may be impacted by the Local Plan, the HRA report looked at a 15km radius from the Plan area. This included the following Habitats sites:

- Mole Gap to Reigate Escarpment SAC;
- Richmond Park SAC;
- South West London Waterbodies SPA;
- South West London Waterbodies Ramsar;
- Thames Basin Heaths SPA; and
- Wimbledon Common SAC.

3.2.2 The conclusions in the HRA Initial Screening Report were that all of the options set out in the consultation paper have the potential to cause likely significant effects on a number of Habitats sites. However, the findings of the report acknowledge that once the Local Plan becomes more detailed, the impacts may not give rise to any significant effects. The identified likely significant effects (which may impact upon Habitat sites) which were screened in following the initial 2017 review are set out in **Table 3.1**. All other Habitats sites and impacts were screened out.

Table 3.1: Summary of Local Plan HRA assessment work

Habitats Site	Potential Likely Significant Effect
Mole Gap to Reigate Escarpment SAC	<p>Recreational disturbance</p> <p>Recreational disturbance can have a negative impact on the chalk grassland, with dog walking and related nutrient enrichment of the grassland.</p> <p>Air quality</p> <p>Increased level of development is likely to give rise to greater vehicle use and thus increased NO_x emissions. The M25 passes close to the protected site and development within the borough could increase traffic flow.</p>
Wimbledon Common SAC	<p>Air quality</p> <p>Qualifying heathland habitat within Wimbledon common is vulnerable to increases in air pollution. The A3 runs adjacent to the north western boundary and new development could increase traffic along this route.</p>

3.2.3 The HRA Initial Screening Report was consulted upon and a response was received from Natural England on 21 November 2017. Natural England noted the following:

¹⁵ Local Plan Review: Habitats Regulations Assessment Stage 1: Initial Screening Report for Core Strategy Review (2017) Epsom & Ewell Borough Council, Available at: <https://www.epsom-ewell.gov.uk/sites/default/files/Habitats%20Regulations%20Assessment%20Screening%20Report%20October%202017.pdf> [Date Accessed: 05/01/23]

-
- 3.2.4 *“In terms of air quality, further investigations will be required when housing numbers and allocation locations are confirmed. This will be likely to require comprehensive transport modelling to identify whether movements from this proposed Local Plan will have an effect on European sites, either alone or in combination with the expected transport movements identified by other Local Plan areas.”*

4 Methodology

4.1 Introduction

4.1.1 As noted in **Section 1.2**, the application of HRA to land-use plans is a requirement of the Habitats Regulations. HRA applies to plans and projects, including all Local Development Documents in England and Wales.

4.1.2 This report has been informed by the following guidance:

- Planning Practice Guidance: Appropriate Assessment¹⁶; and
- The Habitat Regulations Assessment Handbook - David Tyldesley and Associates (referred to hereafter as the DTA Handbook), 2013 (in particular Part F: '*Practical Guidance for the Assessment of Plans under the Regulations*').

4.2 HRA methodology

4.2.1 HRA is a rigorous precautionary process centred around the conservation objectives of a Habitats site's qualifying interests. It is intended to ensure that designated Habitats sites are protected from impacts that could adversely affect their integrity. A step-by-step guide to this methodology is outlined in the DTA Handbook and has been reproduced in **Figure 3.1**.

4.3 Stage 1: Screening for likely significant effects

4.3.1 The first stage in the HRA process comprises the screening stage. The purpose of the screening process is to firstly determine whether a plan is either (1) exempt (because it is directly connected with or necessary to the management of a Habitats site), (2) whether it can be excluded (because it is not a plan), or (3) eliminated (because there would be no conceivable effects), from the HRA process. If none of these conditions apply, it is next necessary to identify whether there are any aspects of the plan which may lead to likely significant effects at a Habitats site, either alone or in combination with other plans or projects.

4.3.2 Screening considers the potential 'significance' of adverse effects. Where elements of the Local Plan will not result in a likely significant effect (LSE) on a Habitats site these are screened out and are not considered in further detail in the process. The screening stage follows a number of steps which are outlined in **Figure 4.1**.

¹⁶ Ministry of Housing, Communities and Local Government (July 2019) Planning Practice Guidance Note, Appropriate Assessment, Guidance on the use of Habitats Regulations Assessment

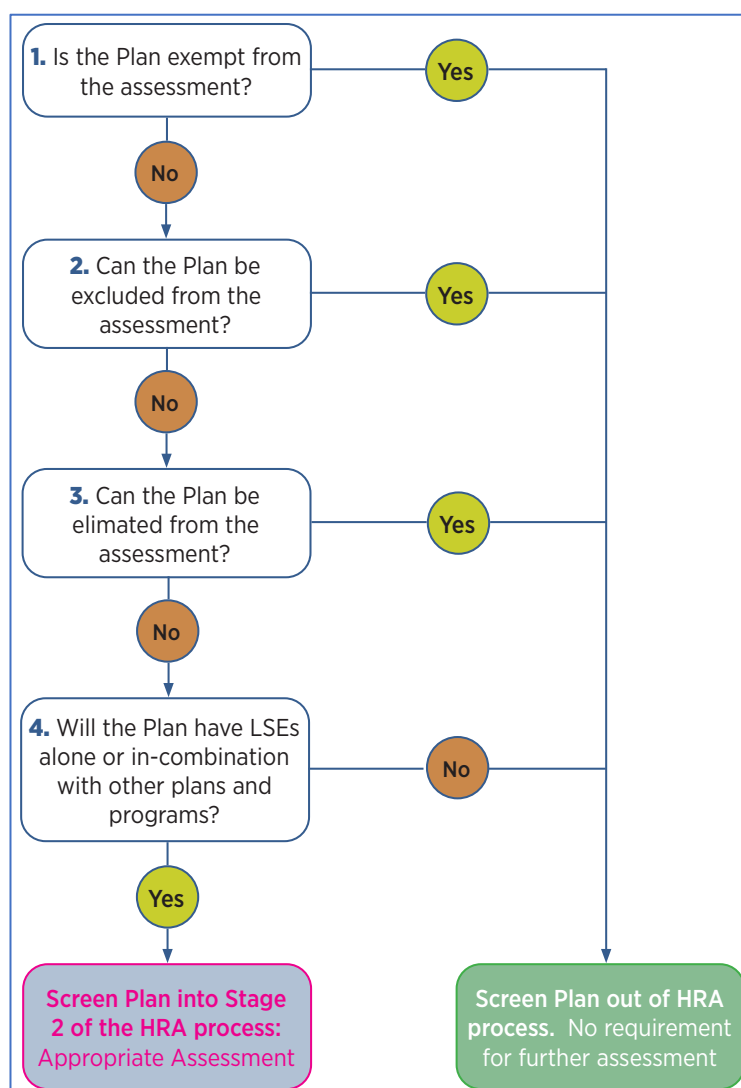


Figure 4.1: Outline of screening process

4.3.3 The pre-screening process uses a number of evaluation codes to summarise whether or not a plan component is likely to have LSEs alone or in-combination, see **Table 4.1**, and inform the formal screening decision.

Table 4.1: Pre-screening assessment and reasoning categories from Part F of the DTA Handbook

Pre-screening assessment and reasoning categories from Chapter F of The Habitats Regulations Assessment Handbook (DTA Publications, 2013):

- A. General statements of policy / general aspirations.
- B. Policies listing general criteria for testing the acceptability / sustainability of proposals.
- C. Proposal referred to but not proposed by the plan.
- D. General plan-wide environmental protection / site safeguarding / threshold policies
- E. Policies or proposals that steer change in such a way as to protect European sites from adverse effects.
- F. Policies or proposals that cannot lead to development or other change.
- G. Policies or proposals that could not have any conceivable or adverse effect on a site.
- H. Policies or proposals the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects).
- I. Policies or proposals with a likely significant effect on a site alone.
- J. Policies or proposals unlikely to have a significant effect alone.

- K. Policies or proposals unlikely to have a significant effect either alone or in combination.
- L. Policies or proposals which might be likely to have a significant effect in combination.
- M. Bespoke area, site or case-specific policies or proposals intended to avoid or reduce harmful effects on a European site.

4.4 What is a Likely Significant Effect?

4.4.1 HRA screening provides an analysis of LSEs identified during the HRA screening process. It considers the nature, magnitude and permanence of potential effects in order to inform the plan making process.

4.4.2 The DTA Handbook guidance provides the following interpretation of LSEs:

4.4.3 *"In this context, 'likely' means risk or possibility of effects occurring that cannot be ruled out on the basis of objective information. 'Significant' effects are those that would undermine the conservation objectives for the qualifying features potentially affected, either alone or in combination with other plans or projects... even a possibility of a significant effect occurring is sufficient to trigger an 'appropriate assessment'."*¹⁷

4.4.4 With reference to the conservation status of a given species in the Habitats or Birds Directives, the following examples would be considered to constitute a significant effect:

- Any event which contributes to the long-term decline of the population of the species on the site;
- Any event contributing to the reduction, or to the risk of reduction, of the range of the species within the site; and
- Any event which contributes to the reduction of the size of the habitat of the species within the site.

4.4.5 Rulings from the 2012 'Sweetman'¹⁸ case provide further clarification:

4.4.6 *"The requirement that the effect in question be 'significant' exists in order to lay down a de minimis 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."*

4.4.7 Therefore, it is not necessary for the Council to show that the Local Plan will result in no effects whatsoever on any Habitats site. Instead, the Council is required to show that the Local Plan, either alone or in-combination with other plans and projects, will not result in an effect which undermines the conservation objectives of one or more qualifying features.

4.4.8 Determining whether an effect is significant requires careful consideration of the environmental conditions and characteristics of the Habitats site in question, as per the 2004 'Waddenzee'¹⁹ case:

¹⁷Tyldesley, D. (2013) The Habitats Regulations Assessment Handbook – Chapter F. DTA Publications

¹⁸ Source: EC Case C-258/11 Reference for a Preliminary Ruling, Opinion of Advocate General Sharpston 'Sweetman' delivered on 22nd November 2012 (para 48)

¹⁹ Source: EC Case C-127/02 Reference for a Preliminary Ruling 'Waddenzee' 7th Sept 2004 (para 48)

4.4.9 *“In assessing the potential effects of a plan or project, their significance must be established in the light, inter alia, of the characteristics and specific environmental conditions of the site concerned by that plan or project”.*

4.5 In-combination effects

4.5.1 Where screening concludes there are no LSEs from the Local Plan alone, it is next necessary to consider whether the effects of the policies in-combination with other plans and projects would combine to result in an LSE on any Habitats site. It may be that the Local Plan alone may not have a significant effect but could have a residual effect that may contribute to in-combination effects on a Habitats site.

4.5.2 The DTA Handbook²⁰ notes that *“where an aspect of a plan could have some effect on the qualifying feature(s) of a European site, but that aspect of the plan alone is unlikely to be significant, the effects of that aspect of the plan will need to be checked in combination firstly, with other effects of the same plan, and then with the effects of other plans and projects”.*

4.5.3 As such an in-combination assessment has been undertaken as part of the HRA process at both the screening stage (where no LSE are considered possible alone but in-combination effects are likely) and will also be undertaken at the Appropriate Assessment stage (where, following Appropriate Assessment and mitigation, an alone insignificant adverse effect is still likely which has the potential to act in-combination with other plans and projects).

4.5.4 Plans and projects which are considered to be of most relevance to the in-combination assessment of the Local Plan include those that have similar impact pathways. These include those plans and projects that have the potential to increase development in the HRA study area. In addition, other plans and projects with the potential to increase traffic across the study area which may act in-combination with the Local Plan, such as transport, waste and mineral plans and projects, have also been taken into consideration. Plans which allocate water resources or are likely to influence water quality in the study area have been considered. Finally, neighbouring authority local plans which may increase development related pressures at Habitats sites have also been considered.

4.5.5 The assessment of potential in-combination effects at screening has not resulted in additional impact pathways being screened in, however, several links between other plans and projects and the Local Plan have been identified for assessment in the HRA process.

4.5.6 The following neighbouring authorities' local plans, and other relevant plans and projects, and their HRA work have been reviewed as part of the screening assessment (see **Appendix A**).

- Surrey County Council;
- Elmbridge Borough Council;
- The Royal Borough of Kingston upon Thames;
- Mole Valley District Council;
- Sutton Council;
- Reigate and Banstead Council;
- Merton Council;
- London Borough of Richmond upon Thames;
- Tandridge District Council;

²⁰ Tyldesley, D. (2013) The Habitats Regulations Assessment Handbook. DTA Publications.

- Croydon Council;
- Woking Borough Council;
- Guildford Borough Council;
- Runnymede Borough Council; and
- Spelthorne Borough Council.

4.5.7 Traffic and roads represent a cross boundary issue. On 20th March 2017 a high court ruling²¹ found that traffic increases and subsequent air pollution on roads within 200m of a Habitats site also requires an in-combination approach that considers the development of neighbouring and nearby authorities. The approach adopted in this HRA is compliant with the Wealden Judgement.

4.6 Consideration of mitigation measures

4.6.1 The European Court Judgement on the interpretation of the Habitats Directive in the case of People Over Wind and Sweetman vs Coillte Teoranta (Case C-323/17²²) determined that mitigation measures are only permitted to be considered as part of an appropriate assessment.

4.6.2 In light of this judgement, it is necessary to further define mitigation measures. The DTA Handbook notes that there are two types of measures as follows²³:

- *“Measures intended to avoid or reduce harmful effects on a European site; or*
- *Features or characteristics of a plan which are essential in defining the nature, scale, location, timing, frequency or duration of the plan’s proposals, or they may be inseparable aspects of the plan, without which an assessment of the plan could not properly be made, in the screening decision, even though these features or characteristics may incidentally have the effect of avoiding or reducing some or all of the potentially adverse effects of a plan”.*

4.6.3 The HRA screening process undertaken for the Local Plan has not taken account of incorporated mitigation or avoidance measures that are intended to avoid or reduce harmful effects on a Habitats site when assessing the LSE of the Local Plan on Habitats sites. These are measures, which if removed (i.e. should they no longer be required for the benefit of a Habitats site), would still allow the lawful and practical implementation of a plan.

²¹ Wealden District Council & Lewes District Council before Mr Justice Jay. Available at: <http://www.bailii.org/ew/cases/EWHC/Admin/2017/351.html> [Date Accessed: 14/12/22]

²² InfoCuria (2018) Case C-323/17. Available at: <http://curia.europa.eu/juris/document/document.jsf?docid=200970&doclang=EN> [Date Accessed: 14/12/22]

²³ Tyldesley, D. (2013) The Habitats Regulations Assessment Handbook. DTA Publications.

4.7 Stage 2: Appropriate Assessment and the Integrity Test

4.7.1 Stage 2 of the HRA process comprises the Appropriate Assessment and Integrity Test. The purpose of the appropriate assessment (as defined by the DTA Handbook) is to “*undertake an objective, scientific assessment of the implications for the European site qualifying features potentially affected by the plan in light of their consideration objectives and other information for assessment*”²⁴.

4.7.2 As part of this process decision makers should take account of the potential consequences of no action, the uncertainties inherent in scientific evaluation and should consult interested parties on the possible ways of managing the risk, for instance, through the adoption of mitigation measures. Mitigation measures should aim to avoid, minimise or reduce significant effects on Habitats sites. Mitigation measures may take the form of policies within the Local Plan or mitigation proposed through other plans or regulatory mechanisms. All mitigation measures must be deliverable and able to mitigate adverse effects for which they are targeted.

4.7.3 The Appropriate Assessment aims to present information in respect of all aspects of the Local Plan and ways in which it could, either alone or in-combination with other plans and projects, affect a Habitats site.

4.7.4 The plan-making body (as the Competent Authority) must then ascertain, based on the findings of the Appropriate Assessment, whether the Local Plan will adversely affect the integrity of a Habitats site either alone or in-combination with other plans and projects. This is referred to as the Integrity Test.

4.8 Dealing with uncertainty

4.8.1 Uncertainty is an inherent characteristic of HRA and decisions can be made only on currently available and relevant information. This concept is reinforced in the 7th September 2004 ‘Waddenzee’ ruling²⁵:

4.8.2 “*However, the necessary certainty cannot be construed as meaning absolute certainty since that is almost impossible to attain. Instead it is clear from the second sentence of Article 6(3) of the habitats directive that the competent authorities must take a decision having assessed all the relevant information which is set out in particular in the appropriate assessment. The conclusion of this assessment is, of necessity, subjective in nature. Therefore, the competent authorities can, from their point of view, be certain that there will be no adverse effects even though, from an objective point of view, there is no absolute certainty.*”

4.9 The Precautionary Principle

4.9.1 The HRA process is characterised by the precautionary principle. This is described by the European Commission as being:

²⁴ Tyldesley, D. (2013) The Habitats Regulations Assessment Handbook. DTA Publications.

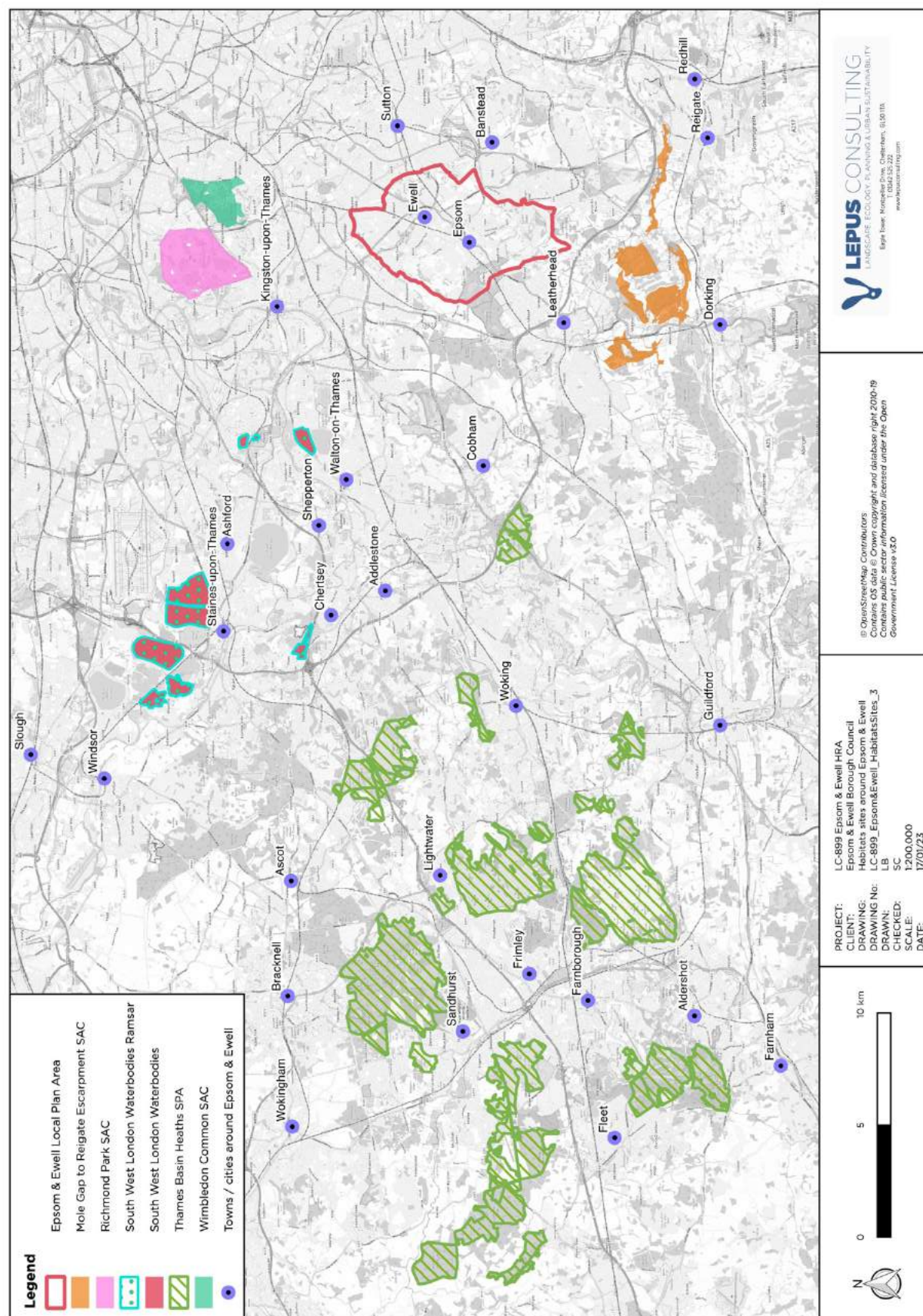
²⁵EC Case C-127/02 Reference for a Preliminary Ruling ‘Waddenzee’ 7th September 2004 Advocate General’s Opinion (para 107)

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- 4.9.2 *“If a preliminary scientific evaluation shows that there are reasonable grounds for concern that a particular activity might lead to damaging effects on the environment, or on human, animal or plant health, which would be inconsistent with protection normally afforded to these within the European Community, the Precautionary Principle is triggered.”*

5 Habitats sites

5.1 Identification of Habitats sites

- 5.1.1 Each Habitats site has its own intrinsic qualities, besides the habitats or species for which it has been designated, that enables the site to support the ecosystems that it does. An important aspect of this is that the ecological integrity of each site can be vulnerable to change from natural and human induced activities in the surrounding environment (known as pressures and threats). For example, sites can be affected by land use plans in a number of different ways, including the direct land take of new development, the type of use the land will be put to (for example, an extractive or noise-emitting use), the pollution / threat a development generates (air pollution or increased recreational pressure), and the resources used (during construction and operation for instance).
- 5.1.2 An intrinsic quality of any Habitats site is its functionality at the landscape ecology scale. This refers to how the site interacts with the zone of influence of its immediate surroundings, as well as the wider area. This is particularly the case where there is potential for developments resulting from the Local Plan to generate water or air-borne pollutants, use water resources or otherwise affect water levels. Adverse effects may also occur via impacts to mobile species occurring outside a designated site, but which are qualifying features of the site. For example, there may be effects on protected bats that use land outside a designated site boundary for foraging, feeding, roosting or other activities.
- 5.1.3 There is no guidance that defines the study area for inclusion in HRA. Planning Practice Guidance for Appropriate Assessment (listed above) indicates that:
- 5.1.4 *“The scope and content of an appropriate assessment will depend on the nature, location, duration and scale of the proposed plan or project and the interest features of the relevant site. ‘Appropriate’ is not a technical term. It indicates that an assessment needs to be proportionate and sufficient to support the task of the competent authority in determining whether the plan or project will adversely affect the integrity of the site”.*
- 5.1.5 The 2017 HRA report of the issues and options consultation (see **Table 3.1**) defined the scope of the HRA by applying a 15km radius. The Habitats sites to be assessed in this HRA report, take into consideration impact pathways and previous HRA work, and are illustrated in **Figure 5.1**. The HRA provides an assessment of potential effects associated with the Local Plan (both alone and in-combination) on these Habitats sites.



5.2 Mole Gap to Reigate Escarpment SAC

5.2.1 The Mole Gap to Reigate Escarpment SAC is located on a chalk ridge which forms the escarpment of the North Downs in Surrey approximately 1.9km to the south of the Plan area. The River Mole cuts through the escarpment resulting in natural chalk cliffs. The SAC is extensively wooded (60%) and also includes areas of open downland (25%), particularly on the south-facing escarpment. The balance of the designated area is heath-scrub (15%). The habitat mosaic includes very species-rich chalk grassland, beech, ash and yew woodland, mixed chalk scrub including juniper, and on the plateau, an extensive area of 'chalk heath' where chalk-loving plants grow alongside those typically associated with acidic soils²⁶.

5.2.2 The qualifying features of the SAC include habitats listed below and two species which include Great Crested Newts and Bechstein's Bat (*Myotis bechsteinii*) (**Appendix B**).

- *Stable xerothermophilous* formations with *Buxus sempervirens* on rock slopes (*Berberidion p.p.*) *Sclerophyllous scrub* (matorral);
- Semi-natural dry grasslands and scrubland facies on calcareous substrates (*Festuco-Brometalia*) (this includes the priority feature "important orchid rich sites");
- *Taxus baccata* woods of the British Isles;
- European dry heaths; and
- *Asperulo-Fagetum* beech forests.

5.2.3 The SAC is vulnerable to public access and disturbance impacts, in particular: trampling of orchid-rich grasslands, repetitive disturbance to great crested newt breeding ponds, and spread of disease²⁷. In addition, it is sensitive to air quality impacts in terms of the deposition of airborne pollutants, as well as to hydrological changes²⁸. Bechstein's Bat roosting habitat (disused lime kilns and caverns at the site) is sensitive to disturbance effects, and it is therefore important to maintain commuting routes from roosts into surrounding habitat and foraging areas (see **Appendix B**). This site has been scoped into the assessment.

5.3 Richmond Park SAC

5.3.1 Richmond Park SAC is a Royal Park located to the south west of London and enclosed by the urban areas of Kingston, Putney, Richmond and Wimbledon. It is located approximately 4.8km to the north of the Plan area. The Park contains a number of ancient and veteran trees which provide habitat for a significant assemblage of saproxylic invertebrates²⁹. The qualifying feature of the SAC is the Stag Beetle (*Lucanus cervus*), with the park being one of four primary sites in England for this species (**Appendix B**).

²⁶ Natural England 2019. Mole Gap to Reigate Escarpment SAC Conservation Objectives Supplementary Advice.
<http://publications.naturalengland.org.uk/file/6354450398838784> [Date Accessed 14/12/22].

²⁷ Natural England. 2014. Site Improvement Plan. Mole Gap to Reigate Escarpment SAC.
<http://publications.naturalengland.org.uk/file/6256378880458752> [Date Accessed: 14/12/22].

²⁸ Natural England. 2019 Mole Gap to Reigate Escarpment SAC Conservation Objectives Supplementary Advice.
<http://publications.naturalengland.org.uk/file/6354450398838784> Available at: [Date Accessed: 14/12/22]

²⁹ Natural England 2016. Richmond Park SAC Conservation Objectives Supplementary Advice.
<http://publications.naturalengland.org.uk/publication/5279688851193856> [Date Accessed 05/01/22].

- 5.3.2 No current threats or pressures were identified in the SIP for Richmond Park SAC (**Appendix B**). There were also no threats or pressures identified in its Natura 2000 data form. This Habitats site has therefore been scoped out of the assessment.

5.4 South West London Waterbodies SPA

- 5.4.1 The South West London Waterbodies SPA comprises a series of embanked water supply reservoirs and former gravel pits which support a range of man-made and semi-natural still, open-water habitats. The complex is situated to the west of London on the broad floodplain of the River Thames. The lakes and reservoirs have varying levels of public use. Some are closed to the public, but most have long- established recreational use. The uses include sailing, canoeing, water-skiing, fishing, birdwatching, diver training and open water swimming³⁰.
- 5.4.2 The components of the SPA which are situated within 15km of the Plan area coincide with Kempton Park Reservoirs Site of Special Scientific Interest (SSSI) and Knights Bessborough Reservoirs SSSI. These are located approximately 7.8km to the north west of the Plan area at their closest point.
- 5.4.3 The SPA is designated for the internationally important non-breeding numbers of Gadwall (*Anas strepera*) and Shoveler (*Anas clypeata*) (**Appendix B**).
- 5.4.4 The South West London Waterbodies SPA is vulnerable to public access and disturbance impacts³¹, changes in air quality and hydrology impacts³² (**Appendix B**).
- 5.4.5 This site has been scoped into the assessment.

5.5 South West London Waterbodies Ramsar

- 5.5.1 As with the SPA, the South West London Waterbodies Ramsar site is designated for the internationally important non-breeding numbers of Gadwall and Shoveler and, whilst no threats are identified in the Ramsar information sheet, it is likely to be vulnerable to similar threats and pressures identified above for the SPA. This site has been scoped into the assessment.

5.6 Thames Basin Heaths SPA

- 5.6.1 The Thames Basin Heaths forms an extensive complex of lowland heathlands in southern England which supports breeding birds which are strongly associated with heathland habitat including Nightjar (*Caprimulgus europaeus*), Woodlark (*Lullula arborea*) and Dartford Warbler (*Sylvia undata*). These birds are the qualifying features of the SPA. The only component of the Thames Basin Heaths SPA within 15km of the Plan area is underpinned by Ockham and Wisley Commons SSSI. This SSSI is situated approximately 9.3km to the west of the Plan area at its closest point.

³⁰ Natural England. 2018. European Site Conservation Objectives: Supplementary advice on conserving and restoring site features. South West London Waterbodies SPA. Available at: <http://publications.naturalengland.org.uk/file/5893345162821632> [Date Accessed: 14/12/22].

³¹ Natural England. 2014. Site Improvement Plan. South West London Waterbodies SPA. <http://publications.naturalengland.org.uk/file/5135484288237568> [Date Accessed: 14/12/22].

³² Natural England. 2018. European Site Conservation Objectives: Supplementary advice on conserving and restoring site features. South West London Waterbodies SPA. Available at: <http://publications.naturalengland.org.uk/file/5893345162821632> [Date Accessed: 14/12/22].

- 5.6.2 The qualifying features of the SPA are vulnerable to pressures which may be exacerbated by development³³. These include air quality, public access and disturbance and hydrological change (**Appendix B**). Of particular note is the potential for recreational pressure and dog walking to disturb these species of ground nesting birds which has implications for breeding success. This site has been scoped into the assessment.

5.7 Wimbledon Common SAC

- 5.7.1 Wimbledon Common SAC comprises a large area of uncultivated land in London and lies approximately 4.8km to the north of the Plan area. It supports a mosaic of broadleaved woodland, acid grassland, dry and wet heath, scrub and mire³⁴. Its qualifying habitats are dry and wet heaths and qualifying species, the Stag Beetle.

- 5.7.2 The qualifying features of the SAC are vulnerable to pressures which may be exacerbated by development³⁵. These include air quality, habitat fragmentation and public access and disturbance (**Appendix B**). This site has been scoped into the assessment.

5.8 Ecological information

- 5.8.1 The CJEU ruling in the Holohan case (C-461/17³⁶) confirmed that appropriate assessment should: (i) catalogue (i.e. list) all habitats and species for which the site is protected and (ii) include in its assessment other (i.e. non-protected) habitat types or species which are on the site and habitats and species located outside of the site if they are necessary to the conservation of the habitat types and species listed for the protected area.

- 5.8.2 This HRA report fully considers the potential for effects on species and habitats which are not listed as a qualifying feature for the Habitats site, but which may be important to achieving its conservation objectives. This ensures that the functional relationships underlying Habitats sites and the achievement of their conservation objectives are adequately understood.

- 5.8.3 SSSIs are protected areas in the United Kingdom designated for conservation. SSSIs are the building blocks of site-based nature conservation in the UK. A SSSI will be designated based on the characteristics of its fauna, flora, geology and/or geomorphology. Whilst typically analogous in ecological function, the reasons for its designation can be entirely different to those for which the same area is designated as a SAC, SPA or Ramsar.

- 5.8.4 Natural England periodically assesses the conservation conditions of each SSSI unit, assigning it a status. SSSIs located either entirely or partially within the Habitats sites considered in this report are listed in **Appendix C** along with their current conservation status. The conservation status of each SSSI highlights any SAC/SPA that is currently particularly vulnerable to threats/pressures. Conservation status is defined as follows:

³³ Natural England. 2014. Thames Basin Heaths SPA Site Improvement Plan.
<http://publications.naturalengland.org.uk/publication/495285926730137> Available at: [Date Accessed: 14/12/22]

³⁴ Natural England. 2016. European Site Conservation Objectives: Supplementary advice on conserving and restoring site features. Wimbledon Common SAC. Available at: <http://publications.naturalengland.org.uk/publication/5706571287887872> [Date Accessed: 14/12/22].

³⁵ Natural England. 2014. Wimbledon Common SAC Site Improvement Plan.
<http://publications.naturalengland.org.uk/publication/5706571287887872> Available at: [Date Accessed: 14/12/22]

³⁶ EUR-Lex (2018) Case C-461/17. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:62017CJ0461&from=EN> [Date Accessed: 14/12/22]

- Favourable;
- Unfavourable – recovering;
- Unfavourable – no change; or
- Unfavourable – declining.

5.8.5 SSSI units in either an ‘Unfavourable – no change’ or ‘Unfavourable – declining’ condition indicate that the Habitats site may be particularly vulnerable to certain threats or pressures. It is important to remember that the SSSI may be in an unfavourable state due to the condition of features unrelated to its Habitats designation. However, it is considered that the conservation status of SSSI units that overlap with Habitats designated sites offer a useful indicator of habitat health at that location.

5.8.6 Natural England defines zones around each SSSI which may be at risk from specific types of development, these are known as Impact Risk Zones (IRZ). These IRZs are *“a GIS tool developed by Natural England to make a rapid initial assessment of the potential risks to SSSIs posed by development proposals. They define zones around each SSSI which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts. The IRZs also cover the interest features and sensitivities of European sites, which are underpinned by the SSSI designation and “Compensation Sites”, which have been secured as compensation for impacts on Natura 2000/Ramsar sites”*³⁷. The location of IRZs has been taken into consideration in this assessment as they provide a useful guide as to the location of functionally linked land and likely vulnerabilities to development proposed within the Local Plan.

³⁷ Natural England (2019) Natural England’s Impact Risk Zones for Sites of Special Scientific Interest User Guidance. Available at: https://magic.defra.gov.uk/Metadata_for_magic/SSSI%20IRZ%20User%20Guidance%20MAGIC.pdf [Date Accessed: 14/12/22]

6 Scoping Impact Pathways

6.1 Gathering information about impact pathways

6.1.1 It is important to understand how the Local Plan may affect a Habitats site in order to determine LSEs. Consideration must first be given to potential links or causal connections between the effects of the Local Plan and Habitats sites. This section therefore scopes potential impact pathways at the Habitats sites presented in **Figure 5.1**. It is noted that Richmond Park SAC has been screened out of the assessment on the basis of the baseline review (see **Section 5.3**).

6.2 Threats and pressures

6.2.1 Threats and pressures to which each Habitats site is vulnerable have been identified through reference to data held by the JNCC on Natura 2000 Data Forms and Site Improvement Plans (SIPs). This information provides current and predicted issues at each Habitats site. Threats and pressures which are likely to be impacted by the Local Plan at each Habitats site are set out in **Section 5** and at **Appendix B**. It is noted that each Habitats site may be vulnerable to other threats and pressures which are outside the scope of the Local Plan. These threats and pressures have not been included in this assessment, having been scoped out.

6.2.2 Supplementary advice notices prepared by Natural England provide more recent information on threats and pressures upon Habitats sites than SIPs. Additional threats flagged up by supplementary advice notices which may be impacted by the Local Plan have also been identified (**Section 5**).

6.2.3 Following a review of HRA assessment work undertaken to date for the Local Plan and an identification of causal connections and links, the threats and pressures that are considered to be within the scope of influence of the Local Plan include the following:

- Changes to air quality;
- Hydrological changes (to include water abstraction, water levels and water pollution);
- Impacts on functionally linked land (to include offsite habitat availability/management and loss of habitat connectivity); and
- Public access and disturbance (to include recreational disturbance and urbanisation threats).

6.3 Air quality

- 6.3.1 Air pollution can affect a Habitats site if it has an adverse effect on its features of qualifying interest. The main mechanisms through which air pollution can have an adverse effect is through eutrophication (nitrogen), acidification (nitrogen and sulphur) and direct toxicity (ozone, ammonia and nitrogen oxides)³⁸. Deposition of air pollutants can alter the soil and plant composition and species which depend upon these.
- 6.3.2 Excess atmospheric nitrogen deposition within an ecosystem or habitat can disrupt the delicate balance of ecological processes interacting with one another. As the availability of nitrogen increases in the local environment, some plants that are characteristic of that ecosystem may become competitively excluded in favour of more nitrophilic plants. It also upsets the ammonium and nitrate balance of the ecosystem, which disrupts the growth, structure and resilience of some plant species.
- 6.3.3 Excess nitrogen deposition often leads to the acidification of soils and a reduction in the soils' buffering capacity (the ability of soil to resist pH changes). It can also render the ecosystem more susceptible to adverse effects of secondary stresses, such as frost or drought, and disturbance events, such as foraging by herbivores.
- 6.3.4 As an attempt to manage the negative consequences of atmospheric nitrogen deposition and acidification, 'critical loads' and 'critical levels' have been established for ecosystems across Europe. Each Habitats site is host to a variety of habitats and species, the features of which are often designated a critical load for nitrogen deposition. The critical loads of pollutants are defined as a:
- 6.3.5 *"...quantitative estimate of exposure to one or more pollutants below which significant harmful effects on specified sensitive elements of the environment do not occur according to present knowledge"*³⁹.
- 6.3.6 Critical levels are defined as *"concentrations of pollutants in the atmosphere above which direct adverse effects on receptors, such as human beings, plants, ecosystems or materials, may occur according to present knowledge"*⁴⁰.

³⁸ APIS (2016) Ecosystem Services and air pollution impacts. Available at: <http://www.apis.ac.uk/ecosystem-services-and-air-pollution-impacts>. [Date Accessed: 09/11/22]

³⁹ Coordination Centre for Effects (CCE). Critical load and level definitions. Available at: https://www.umweltbundesamt.de/en/Coordination_Centre_for_Effects [Date Accessed: 15/12/22]

⁴⁰ Coordination Centre for Effects (CCE). Critical load and level definitions. Available at: https://www.umweltbundesamt.de/en/Coordination_Centre_for_Effects [Date Accessed: 15/12/22]

- 6.3.7 Natural England has developed a standard methodology for the assessment of traffic related air quality impacts under the Habitats Regulations which is relevant to the HRA of land use plans⁴¹. In addition, the Institute of Air Quality Management (IAQM)⁴² and the Chartered Institute of Ecology and Environmental Management (CIEEM)⁴³ have also prepared advice on the assessment of air quality impacts at designated sites. This guidance sets a number of thresholds for screening of Likely Significant (air quality) Effects (LSEs) at the HRA screening stage (Stage 1 of the HRA process) and methodologies for further Appropriate Assessment and ecological interpretation of air quality impacts.
- 6.3.8 The Natural England methodology sets out a staged approach to screening of likely significant air quality effects which has been applied here⁴⁴. The first step is to determine which Habitats sites are likely to be affected by growth set out in the Local Plan. This is undertaken by identifying if the Local Plan will give rise to emissions which are likely to reach a Habitats site.
- 6.3.9 The Local Plan will result in housing growth which will trigger an increase in traffic related emissions to air within and beyond the Plan area. Data obtained from the Office for National Statistics highlights the most common destinations for journeys to work undertaken by car or van arising from Epsom and Ewell and those finishing in Epsom and Ewell⁴⁵. It is noted that these figures do not include journeys to work that both start and end in Epsom and Ewell. This data shows that the key commuting areas include the neighbouring authorities of Reigate and Banstead, Sutton, Mole Valley, Elmbridge and Kingston upon Thames. It is however noted that there is likely to be considerable variance between these destinations, as travel patterns will invariably focus on routes/journeys to significant attractors, such as towns centres and other major employment, retail and leisure areas. It is therefore likely that more remote Habitat sites in districts, with lower journey numbers to/from Epsom and Ewell, are less likely to be affected.
- 6.3.10 Habitats sites which are within this 'key commuting area', and which were shown to be sensitive to air quality (**Section 5**) are listed below. It is considered that traffic related emissions to air from the Local Plan will not reach Habitats sites which are located outside this 'key commuting area'.
- Mole Gap to Reigate Escarpment SAC;
 - South West London Waterbodies SPA and Ramsar;

⁴¹ Natural England (2018) Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (NEA001). Available at: <http://publications.naturalengland.org.uk/publication/4720542048845824> [Date Accessed: 14/12/22]

⁴² Holman et al (2020). A guide to the assessment of air quality impacts on designated nature conservation sites – version 1.1, Institute of Air Quality Management, London.

⁴³ CIEEM (2021) Advice on Ecological Assessment of Air Quality Impacts. Chartered Institute of Ecology and Environmental Management. Winchester, UK.

⁴⁴ Natural England (2018) Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (NEA001). Available at: <http://publications.naturalengland.org.uk/publication/4720542048845824> [Date Accessed: 14/12/22]

⁴⁵ Office for National Statistics (2011) Location of usual residence and place of work by method of travel to work (2011 census data). Available at: <https://www.nomisweb.co.uk/census/2011/wu03uk/chart> and <https://www.nomisweb.co.uk/census/2011/wu03uk> [Date Accessed: 14/12/22]

- Thames Basin Heaths SPA; and
- Wimbledon Common SAC.

Mole Gap to Reigate Escarpment SAC

6.3.11 The European dry heaths, natural box scrub, dry grasslands and scrublands on chalk or limestone, beech forests on neutral to rich soils and yew-dominated woodland qualifying features of Mole Gap to Reigate Escarpment SAC are vulnerable to atmospheric nitrogen deposition. Species such as Bechstein's bat and Great Crested Newt are also sensitive to atmospheric nitrogen deposition as they are reliant upon these habitats.

6.3.12 **Table 6.1** summarises the critical levels and current deposition at Mole Gap to Reigate Escarpment SAC. All data has been taken from the Air Pollution Information System (APIS)⁴⁶.

Table 6.1: Nitrogen deposition Critical Loads of Mole Gap to Reigate Escarpment SAC

Qualifying features	Relevant Nitrogen Critical Load Class	Empirical Critical Load (kg N/ha/yr)	Current Nitrogen Deposition (kg N/ha/yr)
<i>Taxus baccata</i> woods of the British Isles (H91J0)	Coniferous woodland	5-15	Max: 31.7 Min: 29.1 Average: 30.5
European dry heaths (H4030)	Dry heaths	10-20	Max: 18.2 Min: 16.7 Average: 17.6
<i>Asperulo-Fagetum</i> beech forests (H9130)	Fagus woodland	10-20	Max: 31.7 Min: 29.1 Average: 30.5
Stable xerothermophilous formations with <i>Buxus sempervirens</i> on rock slopes (<i>Berberidion</i> pp) (H5110)	Sub-atlantic semi-dry calcareous grassland	15-25	Max: 31.7 Min: 29.1 Average: 30.5
Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>) (H6210)	Sub-atlantic semi-dry calcareous grassland	15-25	Max: 18.2 Min: 16.7 Average: 17.6
<i>Myotis bechsteinii</i> Bechstein's bat (S1323)	Broadleaved deciduous woodland	10-20	Max: 31.7 Min: 29.1 Average: 30.5
<i>Triturus cristatus</i> Great crested newt (S1166)	No comparable habitat with established critical load estimate available.	n/a	Max: 15.6 Min: 11.6 Average: 13.9

⁴⁶ Air Pollution Information Systems (2017) Site relevant critical loads, available at: <https://www.apis.ac.uk/> [Date Accessed: 15/12/22]

- 6.3.13 As can be seen in **Table 6.1**, the current levels of nitrogen deposition at Mole Gap to Reigate Escarpment SAC are within the critical load for European dry heaths and dry grasslands and scrublands on chalk or limestone that receive an average of 17.6kg N/ha/yr. However, they exceed the critical load for all other habitat types with the current average being 30.5kg N/ha/yr⁴⁷.
- 6.3.14 It is widely accepted that air quality impacts are greatest within 200m of a road source, decreasing with distance^{48,49,50}. The next step in Natural England's screening methodology is to identify whether qualifying features, which are sensitive to changes in air quality, are located within 200m of a road and whether these could therefore be exposed to emissions.
- 6.3.15 Three sections of the Mole Gap to Reigate Escarpment SAC lie within 200m of a motorway or 'A' road. The M25 is located within 200m of an area of the south east of Mole Gap to Reigate Escarpment SAC. The A24 runs north to south within 200m of two designated areas of the Mole Gap to Reigate Escarpment SAC. The A25 runs parallel with the south of Mole Gap to Reigate Escarpment SAC and in some areas is within 200m of the Habitats site. The A217 to the north of Reigate runs immediately adjacent to the eastern section of the SAC. In addition, several B grade and smaller roads that form the minor road network lie within 200m of the SAC.

South West London Waterbodies SPA and Ramsar

- 6.3.16 The South West London Waterbodies SPA and Ramsar are often phosphate-limited rather than nitrogen-limited⁵¹. Vehicle exhaust emissions are not a source of phosphates and therefore these Habitats sites can be screened out of the HRA in terms of air quality impacts. Consideration is given to water sources of nitrogen pollution in **Section 6.4** of this assessment.

⁴⁷ Air Pollution Information System APIS (2016) Site relevant critical loads, available at: <http://www.apis.ac.uk/src1> [Date Accessed: 15/12/22]

⁴⁸ The Highways Agency, Transport Scotland, Welsh Assembly Government, The Department for Regional Development Northern Ireland (2007) Design Manual for Roads and Bridges, Volume 11, Section 3, Part 1: Air Quality.

⁴⁹ Natural England (2016) The ecological effects of air pollution from road transport: an updated review. Natural England Commissioned Report NECR 199.

⁵⁰ Bignal, K., Ashmore, M. & Power, S. (2004) The ecological effects of diffuse air pollution from road transport. English Nature Research Report No. 580, Peterborough.

⁵¹ APIS. <https://www.apis.ac.uk/>

Thames Basin Heaths SPA

- 6.3.17 A change in air quality could have a potential negative impact on species due to impacts on the broad habitat types upon which Woodlark, Nightjar and Dartford Warbler rely⁵². These include coniferous woodland and dwarf shrub heath. Air pollution at the SPA may promote changes in species composition of mires towards *Molinia* and sedge dominated systems rather than Sphagnum dominated⁵³. High nitrate levels may also result in the spread of *Molinia* into wet and dry heath. This is a particular issue at Chobham Common but may represent a chronic adverse impact over the SPA complex as a whole⁵⁴.
- 6.3.18 **Table 6.2** summarises the critical levels and current deposition at the Thames Basin Heaths SPA. All data has been taken from APIS⁵⁵.

Table 6.2: Nitrogen deposition Critical Loads of Thames Basin Heaths SPA

Qualifying features	Relevant Nitrogen Critical Load Class	Empirical Critical Load (kg N/ha/yr)	Current Nitrogen Deposition (kg N/ha/yr)
<i>Caprimulgus europaeus</i> European nightjar (A224)	Coniferous woodland	5-15	Max: 31.3 Min: 24 Average: 27.7
<i>Caprimulgus europaeus</i> European nightjar (A224)	Dwarf shrub heath	10-20	Max: 17.9 Min: 13.3 Average: 15.8
<i>Lullula arborea</i> Woodlark (A246)	Coniferous woodland	5-15	Max: 31.3 Min: 24 Average: 27.7
<i>Lullula arborea</i> Woodlark (A246)	Dwarf shrub heath	10-20	Max: 17.9 Min: 13.3 Average: 15.8
<i>Sylvia undata</i> Dartford Warbler (A302)	Dwarf shrub heath	10-20	Max: 17.9 Min: 13.3 Average: 15.8

- 6.3.19 As can be seen in **Table 6.1**, the current levels of nitrogen deposition at the Thames Basin Heaths SPA are within the critical load for dwarf shrub heath which receives an average of 15.8kg N/ha/yr. However, they exceed the critical load for coniferous woodland habitat types, with an average of 27.7kg N/ha/yr⁵⁶.

⁵² APIS. <https://www.apis.ac.uk/>

⁵³ Natural England. 2014. Thames Basin Heaths SPA SIP. Available at: <http://publications.naturalengland.org.uk/publication/6249258780983296> [Date Sourced: 05/01/23].

⁵⁴ Natural England. 2014. Thames Basin Heaths SPA SIP. Available at: <http://publications.naturalengland.org.uk/publication/6249258780983296> [Date Sourced: 05/01/23].

⁵⁵ Air Pollution Information Systems (2017) Site relevant critical loads, available at: <https://www.apis.ac.uk/> [Date Accessed: 15/12/22]

⁵⁶ Air Pollution Information System APIS (2016) Site relevant critical loads, available at: <http://www.apis.ac.uk/src/> [Date Accessed: 15/12/22]

6.3.20 The area of Thames Basin Heaths SPA that is within 15km of the Plan area is underpinned by Ockham and Wisley Commons SSSI. The M25 runs adjacent to the northern boundary of this section of the Thames Basin Heaths SPA and within 200m. The M25 provides an east to west strategic route to the south west of the Plan area but does not connect to it. The A3 runs through Ockham and Wisley Commons SSSI, providing a north to south strategic route to the north west of the Plan area but does not connect to it. In addition, a number of smaller roads that form part of the minor road network lie within 200m of the SPA.

Wimbledon Common SAC

6.3.21 The wet heaths with cross-leaved heath habitat, European dry heaths as well as the stag beetle (*Lucanus cervus*) which are reliant upon broadleaved mixed and yew woodland are under threat from atmospheric nitrogen deposition. **Table 6.3** summarises the critical levels and current deposition at Wimbledon Common SAC. All data has been taken from APIS⁵⁷.

Table 6.3: Nitrogen deposition Critical Loads of Wimbledon Common SAC

Qualifying features	Relevant Nitrogen Critical Load Class	Empirical Critical Load (kg N/ha/yr)	Current Nitrogen Deposition (kg N/ha/yr)
Northern Atlantic wet heaths with <i>Erica tetralix</i> (H4010)	Northern wet heath	10-20	Max: 17 Min: 15.9 Average: 16.4
European dry heaths (H4030)	Dry heaths	10-20	Max: 17 Min: 15.9 Average: 16.4
<i>Lucanus cervus</i> Stag beetle (S1083)	Broadleaved deciduous woodland	10-20	Max: 31 Min: 28.8 Average: 29.8

6.3.22 As can be seen in **Table 6.1**, the current levels of nitrogen deposition at Wimbledon Common SAC are within the critical load for heath which receives an average of 16.4kg N/ha/yr. However, they exceed the critical load for broadleaved deciduous woodland, with an average of 29.8kg N/ha/yr⁵⁸.

6.3.23 The A3 runs adjacent to the north and is within 200m of the west of Wimbledon Common SAC. The A3 provides a north to south strategic route to the north of the Plan area. National statistics commuting data shows that Kingston upon Thames is a key commuting destination for people travelling to and from work from the Plan area. The A219 abuts the east boundary of Wimbledon Common SAC. The A219 forms a north to south route however does not connect to the Plan area but connects to the A24, a strategic route into the centre of the Plan area. In addition, a number of B grade roads (the B281, B351 and B321) and smaller roads that form the minor road network lie within 200m of the SAC.

⁵⁷ Air Pollution Information Systems. Site relevant critical loads, available at: <https://www.apis.ac.uk/> [Date Accessed: 06/01/23]

⁵⁸ Air Pollution Information System APIS. Site relevant critical loads, available at: <https://www.apis.ac.uk/> [Date Accessed: 06/01/23]

- 6.3.24 Given the sensitivities of the Mole Gap to Reigate Escarpment SAC, Thames Basin Heaths SPA and Wimbledon Common SAC to changes in air quality, the next step in Natural England's methodology is to understand if the qualifying features of each site could be exposed to a change in air quality.
- 6.3.25 Obtaining an early understanding of the spatial distribution of qualifying features within a site helps to inform this stage of the assessment. A preliminary review of aerial photography indicates that features for which the SACs and SPA are designated are likely to lie within 200m of a strategic road link.
- 6.3.26 The Natural England advice states that consideration should next be given to the risk of road traffic emissions associated with the Local Plan when screening air quality likely significant effects. The advice notes that an assessment of the risks from road traffic emissions can be expressed in terms of the average annual daily traffic flow (AADT) as a proxy for emissions. The use of the AADT screening threshold is advocated by Highways England in their Design Manual for Roads and Bridges (DMRB). This screening threshold is intended to be used as a guide to determine whether a more detailed assessment of the impact of emissions from road traffic is required. This non-statutory, or guideline threshold, is based on a predicted change of daily traffic flows of 1,000 AADT or more (or a change in heavy-duty vehicle (HDV) flows on motorways of 200 AADT or more).
- 6.3.27 At the time of writing, traffic modelling data was not available to screen impacts from potential site allocations in line with Natural England's methodology. In conclusion, taking a precautionary approach, it is considered that LSEs due to a change in air quality are possible and air quality pathways of impact are therefore scoped in at these Habitats sites. Traffic modelling will be obtained as part of the ongoing plan making process. At Regulation 19 details of the Local Plan will be better understood, and accurate traffic data can be analysed in the context of Natural England's screening methodology. This will ensure compliance with Natural England's comments on the 2017 issues and options HRA (as set out in **Section 3.2**).

6.4 Water quality and quantity

- 6.4.1 Urban development can reduce catchment permeability and the presence of drainage networks may be expected to remove runoff from urbanised catchments. This may result in changes in run off rates from urbanised areas to Habitats sites or watercourses which connect to them. Water mains leakage and sewer infiltration may also affect the water balance.
- 6.4.2 Urbanisation also has the potential to reduce the quality of water entering a catchment during the construction of a development through processes such as sedimentation, accidental spillage of chemicals and materials. Water quality may also be reduced through effluent discharges and pollution as well as an increased water temperature.
- 6.4.3 Features for which a Habitats site is designated are often sensitive to changes in water quality and water quantity. Therefore, urbanisation affecting drainage streams which is connected to a Habitats site has the potential to adversely affect the features for which it is designated.

6.4.4 Epsom and Ewell Borough sits predominantly within the Hogsmill surface water operational catchment of the Thames River Basin District. The Hogsmill River is a tributary of the River Thames flowing in a northerly direction through the Plan area to join the River Thames at Kingston-upon-Thames. A small section of the Plan area to the north lies within the Beverley Brook operational catchment and a small area to the south lies within the Lower Mole and Rytte operational catchment as illustrated in **Figure 6.1**.

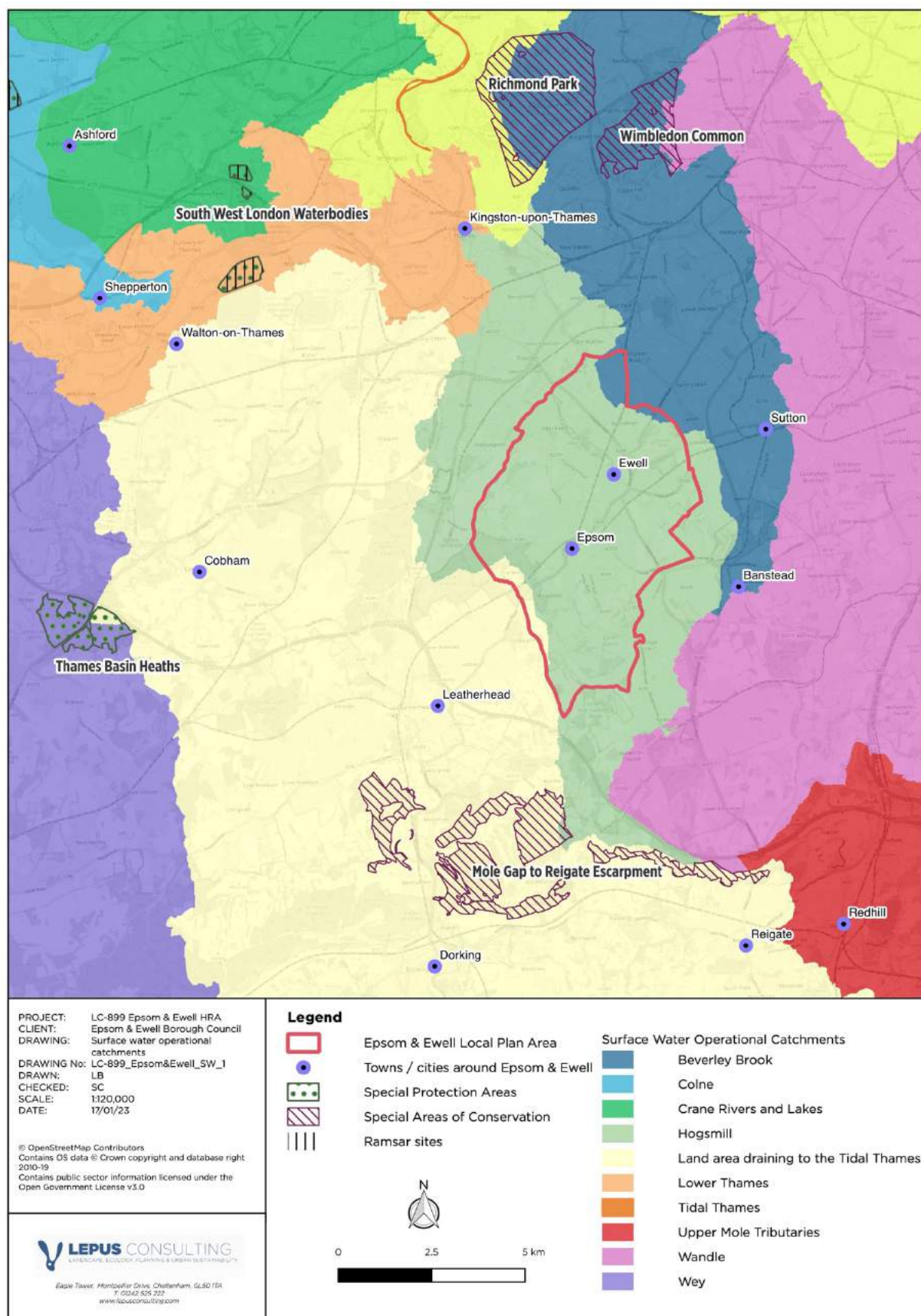


Figure 6.1: Surface Water Operational Catchment Zones within Epsom and Ewell and the surrounding area

- 6.4.5 The Thames River Basin Management Plan (RBMP)⁵⁹ provides a framework for protecting and enhancing the benefits provided by the water environment. To achieve this, and because water and land resources are closely linked, it also informs decisions on land-use planning. It provides strategic level policy guidance in relation to baseline classification of water bodies, statutory objectives for protected areas and water bodies and a summary of measures to achieve statutory protection. The Thames RBMP sets out the priority river basin management issues within the catchment, they are as follows:
- Poor water quality due to diffuse pollution from road run-off, point source pollution from misconnected pipes, and phosphate from the Hogsmill sewage treatment works (STW);
 - Physical modifications such as reinforced bed and walls, the installation of weirs, channel straightening and disconnection from the floodplain; and
 - Poor hydromorphological and habitat diversity.
- 6.4.6 An HRA of the RBMP for the Thames River Basin District was carried out by the Environment Agency, in consultation with Natural England⁶⁰. Its conclusions indicate that, at the strategic plan level, the range of potential mitigation options available allow a conclusion to be drawn that the RBMP is not likely to have any significant effects on any Habitats sites, alone or in combination with other plans or projects. Findings show that HRA requirements will continue to apply for lower tier plan and project level assessments.
- 6.4.7 The Water Framework Directive (WFD) provides an indication of the health of the water environment and whether a water body is at good status or potential. This is determined through an assessment of a range of elements relating to the biology and chemical quality of surface waters and quantitative and chemical quality of groundwater. To achieve good ecological status or potential, good chemical status or good groundwater status every single element assessed must be at good status or better. If one element is below its threshold for good status, then the whole water body's status is classed below good. Surface water bodies can be classed as high, good, moderate, poor or bad status. In 2019 the Hogsmill catchment was classed as being of an overall moderate ecological quality⁶¹.
- 6.4.8 Two water companies operate within Epsom and Ewell, Thames Water, and Sutton and East Surrey (SES) Water. Thames Water supply is made up of 35% pumped from aquifers and the remaining 65% pumped from rivers. Whilst 15% of SES Water comes from natural springs and rivers, 85% is extracted from groundwater aquifers. Each water company must prepare a Water Resources Management Plan (WRMP) to manage water resources in its operating area. Most of the Borough drains to the Hogsmill Sewage Treatment Works which is operated by Thames Water and discharges into the Hogsmill River which is a tributary of the River Thames.

⁵⁹ Environment Agency. 2015. Thames River Basin Management Plan. Available at: <https://www.gov.uk/government/publications/thames-river-basin-district-river-basin-management-plan> [Date Accessed: 09/01/23]

⁶⁰ Environment Agency. 2015. River basin management plan for the Thames River Basin District Habitats Regulations Assessment Updated December 2015.

⁶¹ Environment Agency. Catchment Data Search. Available at: <https://environment.data.gov.uk/catchment-planning/WaterBody/GB106039017440> [Date Accessed: 06/01/23]

- 6.4.9 Thames Water's WRMP19⁶² considers population growth, climate change and the environment in its operating area over a 25 year period. It has used census data and worked with local authorities to understand planned development in the South East, to ensure resilience to drought and to promote water efficiency in new homes. Thames Water undertook an HRA of the Draft WRMP19 in 2019⁶³. The WRMP HRA Stage 1 Screening assessment concluded that, with the inclusion of mitigation measures, Thames Water's revised draft WRMP19 would have no adverse effects on the integrity of any Habitats site, either alone or in-combination with other plans or projects. However, the conclusions acknowledge that HRA would need to be carried out at the individual project level as and when a scheme is brought forward. Thames Water is currently consulting on its WRMP24 which builds on the current plan, planning for future growth to 2075⁶⁴.
- 6.4.10 Sutton and East Surrey Water (SES) have also prepared a WRMP which sets out how they will secure water supplies⁶⁵. During the next few years SES Water will continue to implement demand management initiatives to achieve further leakage and water efficiency savings. An HRA for SES WRMP is not publicly available, and as a result has not informed this HRA report. SES is currently consulting on its 2025 – 2075 WRMP which will cover future years⁶⁶.
- 6.4.11 Given the location of the Plan area downstream of the Mole Gap to Reigate Escarpment SAC and absence of hydrological links to the Thames Basin Heaths SPA and the South West London Waterbodies SPA and Ramsar sites, water impacts are considered unlikely and can therefore be scoped out.
- 6.4.12 The Plan area is hydrologically connected to Wimbledon Common SAC, with a small section situated within the Beverley Brook operational catchment. Hydrological changes have been identified as a threat to the 'wet heathland with cross-leaved heath' qualifying feature on Wimbledon Common SAC. Of particular concern is the change to source, depth, frequency and magnitude of water supply that can have significant implications on the assemblage of characteristic plants and animals present. Maintenance or restoration of the hydrological regime is required to sustain the wet heath habitat.

⁶² Thames Water. 2020. Shape your water future. WRMP 2020 to 2100. Available at: <https://www.thameswater.co.uk/about-us/regulation/water-resources/wrmp19> [Date Accessed: 06/01/23]

⁶³ Thames Water Revised Draft Water Resources Management Plan 2019 Habitat Regulations Assessment (2018) Ricardo, Available at: <https://www.thameswater.co.uk/media-library/home/about-us/regulation/water-resources/technical-appendices/appendix-c-habitats-regulation-assessment.pdf> [Date Accessed: 06/01/23]

⁶⁴ Thames Water. 2022. Draft WRMP 2024. Available at: <https://thames-wrmp.co.uk/hearing-your-views/document-library/> [Date Accessed: 06/01/23]

⁶⁵ Sutton and East Surrey Water Draft Water Resources Management Plan (2019) Available at: <https://seswater.co.uk/about-us/publications/our-water-resources-management-plan> [Date Accessed: 06/01/23]

⁶⁶ Sutton and East Surrey Water. 2022. Draft WRMP 2022. <https://seswater.co.uk/about-us/publications/our-water-resources-management-plan> [Date Accessed: 06/01/23]

6.4.13 The SIP notes that *“Defining and maintaining the appropriate hydrological regime is a key step in moving towards achieving the conservation objectives for this site and sustaining this feature”*⁶⁷.

6.4.14 Development within the Plan area has the potential to impact surface water quality downstream and therefore, could have a negative impact upon the qualifying features of Wimbledon Common SAC.

6.5 Impacts on functionally linked land

6.5.1 There are no Habitats sites located within the Plan area and therefore the Local Plan will not result in the direct loss of land within an area designated as a Habitats site. However, there is potential for the Local Plan to result in the loss / disturbance to habitat outside a designation boundary. Supporting habitat, also referred to as functionally linked habitat⁶⁸, may be located some distance from a Habitats site. The fragmentation of habitats through the loss of connecting corridors would have the potential to hinder the movement of qualifying species.

6.5.2 A review of threats and pressures at each Habitats site identified a number of mobile qualifying features for Habitats sites within the study area (**Section 5**) at Mole Gap to Reigate Escarpment SAC, Thames Basin Heaths SPA and Wimbledon Common SAC.

Mole Gap to Reigate Escarpment SAC

6.5.3 A review of background data has highlighted the sensitivities of Bechstein Bat roosting habitat at Mole Gap to Reigate Escarpment SAC to disturbance effects and the importance of maintaining commuting routes from roost into surrounding habitat and foraging areas.

⁶⁷ Natural England. 2016. European Site Conservation Objectives: Supplementary advice on conserving and restoring site features. Wimbledon Common Special Area of Conservation (SAC) Site Code: UK0030301. Available at: <http://publications.naturalengland.org.uk/publication/5706571287887872> [Date Accessed: 06/01/23].

⁶⁸ “The term ‘functional linkage’ refers to the role or ‘function’ that land or sea beyond the boundary of a European site might fulfil in terms of ecologically supporting the populations for which the site was designated or classified. Such land is therefore ‘linked’ to the European site in question because it provides an important role in maintaining or restoring the population of qualifying species at favourable conservation status”. Source: Natural England. 2016. Commissioned Report. NECR207. Functional linkage: How areas that are functionally linked to European sites have been considered when they may be affected by plans and projects – a review of authoritative decisions.

6.5.4 The Bat Conservation Trust (BCT) notes that Bechstein's Bat is a species that is predominantly associated with broadleaved woodlands using stream corridors and hedgerows to commute to foraging areas⁶⁹. The BCT has defined a number of species-specific Core Sustainance Zones (CSZ). These refer to the area surrounding a communal bat roost within which habitat availability and quality will have a significant influence on the reliance and conservation status of the colony using the roost. For Bechstein's Bat a CSZ of 1km is identified with moderate confidence. The BCT guidance therefore suggests that this CSZ should be increased to at least 3km to reflect the bat's specific habitat requirements⁷⁰. As the Plan area is located approximately 1.9km to the north of Mole Gap to Reigate Escarpment SAC at its closest point, it is therefore considered that functionally linked Bechstein's Bat habitat may be affected by the Local Plan and has therefore been scoped in.

6.5.5 Great Crested Newts are one of the qualifying species for the Mole Gap to Reigate Escarpment SAC. Whilst Great Crested Newts rely on water bodies to breed and during the aquatic stages of their life cycle, they are known to travel approximately 500m from their breeding pond habitat during the terrestrial phase of their lifecycle^{71,72}. Depending on the location of the ponds within the SAC terrestrial habitat may include land outside the SAC boundary. The Plan area is located at its closest point 1.9km from the Mole Gap to Reigate Escarpment SAC. It is therefore considered that functionally linked Great Crested Newt habitat will not be affected by development set out in the Local Plan and can be scoped out.

Thames Basin Heaths SPA

6.5.6 As noted in **Section 5**, the Thames Basin Heaths SPA is designated for the populations of breeding birds it supports, including European Nightjar, Woodlark and Dartford Warbler. **Table 6.4** outlines habitat requirements for these qualifying features.

Table 6.4: *Thames Basin Heaths SPA qualifying features and their suitable habitats*

Species	Habitat
European nightjar (<i>Caprimulgus europaeus</i>)	The Nightjar is a ground-nesting summer migrant which feeds on moths and other flying insects at night, mainly at dusk and dawn. They predominantly feed over heathland and along forest rides but are most successful at feeding when there is range of food-rich habitats present ⁷³ . Nightjars nests are usually located within gaps in dry lowland heathland, coppice woods or forest clearings with limited tree canopy cover. During the day the nightjar is found on open ground habitats and often use trees as song or lookout posts ⁷⁴ . They require an open mosaic of habitats to meet all lifecycle stages. The height, cover, variation and composition of vegetation and characteristics of habitat are important to

⁶⁹ Bat Conservation Trust. 2016. Bat Surveys for Professional Ecologist. Good Practice Guidelines. Third Edition.

⁷⁰ Bat Conservation Trust. 2016. Core Sustainance Zone.

https://cdn.bats.org.uk/pdf/Resources/Core_Sustainance_Zones_Explained_04.02.16.pdf?mtime=20190219173135&focal=none

⁷¹ Natural England (2015) Great crested newts: protection and licences. Available at: <https://www.gov.uk/guidance/great-crested-newts-protection-surveys-and-licences> [Date Accessed: 15/12/22]

⁷² Langton, T.E.S., Beckett, C.L., and Foster, J.P. (2001), Great Crested Newt Conservation Handbook, Froglife, Halesworth.

⁷³ RSPB. Land management for nightjars. <https://www.rspb.org.uk/our-work/conservation/conservation-and-sustainability/advice/conservation-land-management-advice/nightjars/>

⁷⁴ Cornish, C., Lowe, A., Wilkinson, C., Lucas, E and Wotton, S. 2018. A report by RSPB for the Sherwood Habitats Strategy Group.

Species	Habitat
	support breeding and successful nesting, rearing of young, concealment from predators and movement along flight lines and roosting. Requirements for a nightjar include ⁷⁵ : <ul style="list-style-type: none"> • Heathland; • Open woodland; • Clearings; • Recently felled conifer plantations; and • Heterogenous and semi-open natural habitats.
Woodlark (<i>Lullula arborea</i>)	Woodlarks are a ground nesting bird which feeds predominantly on beetles, caterpillars and spiders foraged from the soil or from short turf ⁷⁶ . During the winter, they change their diet to feed on seeds and often join flocks of finches, skylarks and buntings on stubbles and set-aside fields and therefore agricultural fields may become an important habitat type at this time of the year. Similarly to nightjar, woodlark require an open mosaic structure of habitat to support all life cycle stages. Occasional trees around woodland edges or scattered trees provide song and lookout posts. Their habitat requirements include: <ul style="list-style-type: none"> • Lowland heathland with short, sparse, natural developed turf interspersed with tussocky vegetation; • A high abundance of invertebrate prey on bare ground; • Winter fields (stubbles and set-asides); and • Heterogeneous land type with two to four land cover types suitable for foraging and nesting.
Dartford warbler (<i>Sylvia undata</i>)	The Dartford Warbler is a ground nesting bird associated with lowland heathland ⁷⁷ . This species favours dense, homogenous scrub, that is dominated by species such as gorse (<i>Ulex</i>), heath (<i>Erica</i>), brooms (<i>Genista</i>) and oak (<i>Quercus</i>). These species provide safe nesting places, hunting ground and signing platforms ⁷⁸ .

6.5.7 Given the distance of the Plan area from the Thames Basin Heaths SPA (9km to the east), and urban development between the SPA and the Plan area including the M25 which act as a barrier to movement, it is considered unlikely that development set out in the Local Plan will have a LSE upon the bird species associated with the SPA and this pathway of impact can therefore be scoped out.

Wimbledon Common SAC

6.5.8 As noted in **Section 5**, the qualifying species of the Wimbledon Common SAC is the Stag Beetle. The Stag Beetle is a saproxylic invertebrate which relies on moist decaying woodland. The population of Stag Beetles within the SAC is unlikely to be supported by habitat located within the Plan area due its distance from the SAC (approximately 4.9km to the south of the SAC) and presence of urban development in between which creates a barrier to movement. It is therefore considered unlikely that the Local Plan will have a LSE upon functionally linked habitat for this qualifying feature and this pathway of impact can be scoped out.

⁷⁵ Sierro, Antoine, et al. "Habitat use and foraging ecology of the nightjar (*Caprimulgus europaeus*) in the Swiss Alps: towards a conservation scheme." *Biological conservation* 98.3 (2001): 325-331.

⁷⁶ RSPB. Land management for Woodlark. <https://www.rspb.org.uk/our-work/conservation/conservation-and-sustainability/advice/conservation-land-management-advice/woodlarks/> [Date Accessed: 08/11/22]

⁷⁷ <https://www.wildlifetrusts.org/wildlife-explorer/birds/tits-crests-and-warblers/dartford-warbler>

⁷⁸ <https://www.rspb.org.uk/birds-and-wildlife/wildlife-guides/bird-a-z/dartford-warbler/>

6.6 Public access and disturbance

6.6.1 Public access and disturbance can take a number of forms. It can include both physical and non-physical disturbance, which can be caused by urbanisation pressures and increased recreational activity.

6.6.2 These activities can result in damage to habitats through erosion and compaction, troubling of grazing stock, spreading invasive species, cat predation, dog fouling, litter and fly-tipping, tree climbing, wildfire and arson, noise, vibration, light pollution and vandalism.

Recreational Pressure

6.6.3 Across the UK, public access and disturbance threats at Habitats sites are often considered in terms of buffer distances. For recreational impacts, these are often determined through analysis of visitor and recreational survey data, baseline site information and take into consideration the proximity of new development.

6.6.4 As set out in **Section 5**, the following Habitats sites have been identified as being sensitive to increased recreational pressure from development.

- Mole Gap to Reigate Escarpment SAC;
- South West London Waterbodies SPA;
- South West London Waterbodies Ramsar;
- Thames Basin Heaths SPA; and
- Wimbledon Common SAC.

Mole Gap to Reigate Escarpment SAC

6.6.5 Mole Gap to Reigate Escarpment SAC is accessible via several Public Right of ways (PROWs). The North Downs Way National Trail runs in an east to west direction through the south of Mole Gap to Reigate Escarpment SAC. There are two car parks located to the east of the site and two car parks located to the south of the site including Box Hill Café and visitor centre.

- 6.6.6 As part of the 2008 Mole Valley Local Development Framework (LDF) Appropriate Assessment⁷⁹ a review of visitor surveys undertaken in 2004 by the National Trust and in 2005 and 2006 by Bournemouth University was undertaken (see Appendix C of the Mole Valley Appropriate Assessment)⁸⁰. Analysis of postcode data from the National Trust surveys indicated that 77 visitors were recorded from Ewell, and 85 from Epsom (which represents 3.61% and 3.9% of all visitors surveyed respectively). The results of the Bournemouth surveys indicated that the majority of people coming to the SAC were however from further afield, with over 80% (82% at Headley, rising to some 93% at Reigate Hill/Gatton originating from over 5 miles away and over 54% (Headley), rising to 81% (Reigate Hill/Gatton) originating from over 15 miles away. The Mole Valley LDF Appropriate Assessment concluded that, on the basis of these surveys, recreational pressure at the Mole Gap to Reigate Escarpment SAC is focused mainly around honeypot sites⁸¹, with the majority of impact being within a small radius of the car parks. The studies also showed that, although there are local visitors to the sites, large numbers originate from over 15 miles (24.14km) and therefore the majority of recreational pressure is caused by visitors travelling from further afield.
- 6.6.7 There is already considerable recreational pressure noted at the SAC which requires high levels of management⁸². Further development beyond Mole Valley District Council's administrative boundary has the potential to further increase the volume of visitors to the SAC, requiring careful management to ensure that no significant damage is caused to the important features of this Habitats Site. As a result of the Appropriate Assessment of Mole Valley's Local Development Framework (LDF), Policy CS15 of the Mole Valley LDF safeguards a buffer zone of 800m around the SAC. Within this area there is a presumption "*against any increase in residential or employment related development...unless its impact is mitigated*". Large development outside the 800m buffer is still likely to result in significant visitor numbers to the SAC. In Mole Valley District Council's administrative area, large residential developments are therefore required to consider the impacts upon the SAC and provide suitable mitigation⁸³.
- 6.6.8 At its closest point the Plan area lies within 1.9km of the SAC, which is outside the Mole Valley LDF 800m buffer. It is therefore considered that the impact of the Local Plan alone would have a small effect on Mole Gap to Reigate Escarpment SAC.

⁷⁹ Mole Valley District Council. 2008. Mole Valley Local Development Framework Mole Valley Appropriate Assessment. Available at: <https://www.molevalley.gov.uk/sites/default/files/home/building-planning/local-plans/local-plan-evidence-and-background-information/appropriateassessment.pdf> [Date Accessed: 09/01/22]

⁸⁰ Survey locations included car parks at Box Hill, Headley Heath and Gatton Park, immediately adjacent to the Mole Gap to Reigate Escarpment SAC.

⁸¹ Honeypot sites include: Reigate Hillfort adjacent to but not within the SAC, the Ingliss Memorial within the SAC, the North Downs Way which runs through the SAC and Box Hill which is situated within the SAC.

⁸² Mole Valley District Council (2012) Mole Gap to Reigate Escarpment SAC Guidance Notice, Available at: https://www.molevalley.gov.uk/sites/default/files/home/building-planning/local-plans/sacguidancefinal_0.pdf [Date Accessed: 15/12/22]

⁸³ Mole Valley District Council (2012) Mole Gap to Reigate Escarpment SAC Guidance Notice, Available at: https://www.molevalley.gov.uk/sites/default/files/home/building-planning/local-plans/sacguidancefinal_0.pdf [Date Accessed: 15/12/22]

- 6.6.9 Given the large recreational draw of the SAC across London and the South East and the distance of the Plan area from the key car park locations (honeypot sites) it is considered likely that an in-combination visitor contribution from Epsom and Ewell is possible and as such has been scoped into the assessment for further consideration.

South West London Waterbodies SPA and South West London Waterbodies Ramsar

- 6.6.10 All qualifying features of South West London Waterbodies SPA and South West London Waterbodies Ramsar, namely the habitats and non-breeding populations of Gadwall and Shoveler, are recognised as being under threat from public access associated disturbances (**Appendix B**).
- 6.6.11 A key environmental condition of South West London Waterbodies SPA and Ramsar is a lack of disturbance during the winter months of October to March. Disturbances of sufficient extent, intensity or duration can cause the Gadwall and Shoveler populations to abandon the site. Different waterbodies of the SPA offer different levels of access to the public, with some more restricted than others.
- 6.6.12 The reservoirs within 15km of the Plan area include Knight and Bessborough Reservoirs and Kempton Park Reservoirs. Knight and Bessborough Reservoirs is an operational site belonging to Thames Water and public access is limited. A total of ten permits are available to bird watchers from recognised clubs. Kempton Park Reservoirs are not open to the public and locked fencing surrounds the site.
- 6.6.13 Where possible, recreational use across much of the SPA is managed through the Potentially Damaging Operations Scheme. Any operations that may undermine the integrity of the SSSIs, which underpin the SPA, therefore require consent from Natural England.
- 6.6.14 Given the location of these designations from the Plan area, existing public access and the environmental controls currently in place, recreational pathways of impact at the South West London Waterbodies SPA and South West London Waterbodies Ramsar can be scoped out.

Thames Basin Heaths SPA

- 6.6.15 The Thames Basin Heaths SPA Delivery Framework⁸⁴ makes recommendations for accommodating development while also protecting the SPA's features. This includes the recommendation for implementing a series of zones within which varying constraints would be placed upon development. In terms of recreational impacts, within a 400m to 5km zone from the perimeter of the SPA avoidance measures are considered necessary to avoid recreational impacts⁸⁵. In addition, applications for large scale development (i.e. those comprising more than 50 houses which are located between 5-7km from the edge of the SPA) are considered on a case-by- case basis⁸⁶.

⁸⁴ Thames Basin Heaths Joint Strategic Partnership Board (2009). Thames Basin Heaths SPA Delivery Framework. <https://www.bracknell-forest.gov.uk/sites/default/files/2021-08/thames-basin-heaths-spa-delivery-framework.pdf> [Date Accessed: 09/01/23].

⁸⁵ Thames Basin Heaths Joint Strategic Partnership Board (2009). Thames Basin Heaths SPA Delivery Framework. <https://www.bracknell-forest.gov.uk/sites/default/files/2021-08/thames-basin-heaths-spa-delivery-framework.pdf> [Date Accessed: 09/01/23].

⁸⁶ Thames Basin Heaths Joint Strategic Partnership Board (2009). Thames Basin Heaths SPA Delivery Framework. <https://www.bracknell-forest.gov.uk/sites/default/files/2021-08/thames-basin-heaths-spa-delivery-framework.pdf> [Date Accessed: 09/01/23].

- 6.6.16 The Thames Basin Heaths SPA is located approximately 9km from the Plan area which is outside the 5km and 7km areas of impact set out in the SPA Delivery Framework. As such it is considered there are unlikely to be adverse impacts from the Local Plan upon the SPA due to increased recreational pressures and this site can be scoped out.

Wimbledon Common SAC

- 6.6.17 Wimbledon Common SAC is located approximately 4.8km to the north of the Plan area. It is accessible via several Public Rights of Way (PRoW) and provides recreational facilities such as playing fields and a golf course. It is sensitive to potential threats from public access associated with the removal of dead wood by visitors which could adversely affect the ability of the SAC to support the Stag Beetle⁸⁷. However, this action cannot be attributed to general growth of visitors to the SAC.
- 6.6.18 The heathlands of the SAC are potentially vulnerable to recreational pressures as Wimbledon Common is an unfenced common, with the whole area open to the public, throughout the year⁸⁸. Heathland habitat is located in the north of the SAC⁸⁹ and is managed by the Wimbledon and Putney Commons Conservators. This management helps to maintain the status of this habitat through clearance of scrub and monitoring the wildlife through volunteers and programmes such as BioBlitz⁹⁰.
- 6.6.19 Wimbledon Common is an area designed for recreational use and is managed by the Wimbledon and Putney Common Conservators to ensure that wildlife is protected and enhanced. It is therefore considered unlikely that the Local Plan will cause increases in visitor pressures at the SAC and this site has been scoped out.

Urbanisation Pressure

- 6.6.20 Urbanisation effects are caused where development is located close to a Habitats site designated boundary. These effects often include cat predation of ground nesting birds, lighting (illumination), visual disturbance, fly tipping, noise and vandalism. As with recreational impacts, urbanisation mitigation strategies have been implemented across the UK through the establishment of buffer zones. Commonly applied urbanisation zones of influence extend around 400m from the edge of a designation as this reflects likely impacts from pets (e.g. cat predation) and the distance from which people access a site on foot. The Thames Basin Heaths Special Protection Area Delivery Framework⁹¹ is one such strategy which makes recommendations for accommodating development while also protecting the SPA's qualifying features by establishing a 400m zone where development does not take place.

⁸⁷ Natural England. 2014. Wimbledon Common SAC Site Improvement Plan.

<http://publications.naturalengland.org.uk/publication/570657128788787> Available at: [Date Accessed: 14/12/22]

⁸⁸ Annual Conservation Report (2017) Wimbledon and Putney Commons, Available at: <https://www.wpcc.org.uk/downloads/nature/annual-conservation-report-.pdf> [Date Accessed: 09/01/23]

⁸⁹ MAGIC (2019) Defra, Available at: <https://magic.defra.gov.uk/> [Date Accessed: 09/01/23]

⁹⁰ Ecological and Environmental Monitoring Report (2018) Wimbledon and Putney Commons, Available at: <https://www.wpcc.org.uk/downloads/nature/ecological-and-monitoring-report-final-for-publication2019.pdf> [Date Accessed: 09/01/23]

⁹¹ Thames Basin Heaths Joint Strategic Partnership Board (2009). Thames Basin Heaths SPA Delivery Framework. <https://www.bracknell-forest.gov.uk/sites/default/files/2021-08/thames-basin-heaths-spa-delivery-framework.pdf> [Date Accessed: 15/12/22].

6.6.21 Given no Habitats sites are located within the Plan area or within 400m, urbanisation pathways of impact can be scoped out.

6.7 Summary of threats and pressures

6.7.1 **Table 6.5** provides a summary of the scoping outputs in terms of Habitats sites which will form the basis of the HRA screening assessment.

Table 6.5: Pressures and threats from the Local Plan at Habitats sites

Habitats sites	Air pollution	Water quality and quantity	Impacts on functionally linked land	Recreational Impacts
Mole Gap to Reigate Escarpment SAC	Vulnerable	No threat or pressure	Vulnerable	Vulnerable
South West London Waterbodies SPA and South West London Waterbodies Ramsar	No threat or pressure	No threat or pressure	No threat or pressure	No threat or pressure
Thames Basin Heaths SPA	Vulnerable	No threat or pressure	No threat or pressure	No threat or pressure
Wimbledon Common SAC	Vulnerable	Vulnerable	No threat or pressure	No threat or pressure

7 Screening (HRA Stage 1)

7.1 Local Plan pre-screening

7.1.1 Each component of the draft Local Plan has been appraised against the HRA pre-screening criteria (see **Table 4.1**), taking into consideration case law and best practice. **Appendix D** provides the output of this screening exercise.

7.1.2 It is concluded that LSEs, either from the Local Plan alone or in- combination with other plans or projects, could be screened out for some elements of the draft Local Plan. This is because they fall into the following categories (see **Table 4.1** for a description of each category):

- Category A: General statements of policy / general aspirations;
- Category B: Policies listing general criteria for testing the acceptability / sustainability of proposals;
- Category D: Environmental protection / site safeguarding; and
- Category F: Policies or proposals that cannot lead to development or other change.

7.1.3 A number of components were however considered likely to have an LSE on the basis of this assessment as they fall into the following categories:

- Category I: Policies or proposals with a likely significant effect on a site alone;
- Category L: Policies or proposals which might be likely to have a significant effect in combination; and
- Category M: Bespoke area, site or case-specific policies or proposals intended to avoid or reduce harmful effects on a Habitats site.

7.1.4 **Table 7.1** provides a summary of policies that have been screened in.

Table 7.1: Summary of screened in draft Local Plan components

Policy Number	Policy Name	Screening Category
SP1	Spatial Strategy	Category I
Site SA1	Hook Road Car Park and SGN Site	Category L
Site SA2	Town Hall, Hope Lodge and Epsom Clinic	Category L
Site SA3	Depot Road and Upper High Street	Category L
Site SA4	Ashley Centre and Global House	Category L
Site SA5	Land at West Park Hospital	Category L
Site SA6	Horton Farm (Greenfield)	Category L
Site SA7	Land at Chantilly Way (Greenfield)	Category L

Policy Number	Policy Name	Screening Category
Site SA8	Land adjoining Ewell East Station (Greenfield)	Category L
Site SA9	Hook Road Arena (Greenfield)	Category L
Policy S14	Biodiversity	Category M

7.1.5 LSEs were identified at the following Habitats sites:

- **Mole Gap to Reigate Escarpment SAC** screened in for air quality, impacts on potentially functionally linked land and recreational pressure LSEs;
- **Thames Basin Heaths SPA** screened in for air quality LSEs; and
- **Wimbledon Common SAC** screened in for air quality and hydrology LSEs.

7.1.6 No LSEs from the draft Local Plan were identified at Richmond Park SAC, the South West London Waterbodies SPA and South West London Waterbodies Ramsar and as such these Habitats sites have been screened out of the HRA process at this stage.

8 Conclusions and Next Steps

8.1 Conclusions

8.1.1 A scoping exercise was undertaken to identify pathways of impact between the draft Local Plan and Habitats sites within areas of impact. This process applied a 'source-pathway-receptor' model. Baseline data was then collated for all Habitats sites with the potential to be affected by components of the Local Plan.

8.1.2 The draft Local Plan is not directly connected with or necessary to the management of any Habitats site. A screening assessment was therefore undertaken which identified a number of LSEs associated with the draft Local Plan. Taking no account of mitigation measures, it is concluded that the draft Local Plan has the potential to affect the following Habitats sites:

- **Mole Gap to Reigate Escarpment SAC** screened in for air quality, impacts on potentially functionally linked land and recreational pressure LSEs;
- **Thames Basin Heaths SPA** screened in for air quality LSEs; and
- **Wimbledon Common SAC** screened in for air quality and hydrology LSEs.

8.1.3 Taking into consideration the outputs of the screening exercise, it is therefore necessary to progress to the next stage of the HRA process - Appropriate Assessment. An Appropriate Assessment will be undertaken iteratively alongside the plan making process and reported upon at Regulation 19 – Public consultation on the proposed submission Local Plan.

8.1.4 The outputs of the Appropriate Assessment may result in the need to consider more detailed mitigation measures to ensure the Local Plan has no adverse impact on the integrity of any Habitats site.

8.2 Next steps

8.2.1 The purpose of this report is to inform the HRA of the publication consultation on the draft version of the Local Plan (Regulation 18) using best available information. There is no formal statutory requirement for consultation with the statutory nature conservation body, Natural England, at this stage of the HRA process (screening). It is however best practice to engage with Natural England (and other stakeholders) upon the outputs of the screening exercise and also upon the scope of the Appropriate Assessment going forwards. This will ensure all parties are in agreement with the direction of the HRA.

8.2.2 The HRA screening process will be revisited as part of the Regulation 19 stage of the plan making process if new policies emerge or existing policy proposals are modified following the Regulation 18 draft Local Plan consultation stage. In addition, an Appropriate Assessment will be undertaken to better define LSEs upon the Mole Gap to Reigate Escarpment SAC, Thames Basin Heaths SPA and Wimbledon Common SAC.

8.2.3 The Council, as the Competent Authority, has responsibility to make the Integrity Test. An HRA Report will be prepared at the Regulation 19 stage of the plan making process to support the Council, as the Competent Authority, when it makes the Integrity Test.

Appendix A: In-combination assessment

Plans and Policies	Plan Status	Key Elements of the Plan that Could Cause in-combination Effects
Surrey County Council Waste Plan ¹	Adopted December 2020 Surrey County Council, as the Minerals and Waste Planning Authority, are preparing a new Minerals and Waste Local Plan for Surrey – this is at issues and options consultation.	Industrial Land Areas of Search are defined in the Waste Plan. These are broad areas, not allocated as sites for waste development, but identified as areas of search within which there may be potential for waste development. These include Longmead Industrial Estate in Epsom and Ewell. The plan also allocates sites (outside the Plan area) to ensure that sufficient land is available to manage the county's existing and future waste arising during the plan period.
Surrey County Council Mineral Plan ²	Surrey adopted Minerals Plan Core Strategy 2011-2026 Surrey County Council, as the Minerals and Waste Planning Authority, are preparing a new Minerals and Waste Local Plan for Surrey – this is at issues and options consultation.	Objectives include: 1. Reduce demand for minerals 2. Safeguard the supply of minerals 3. Meet the need for minerals 4. Address adverse impacts for mineral development on communities and the environment 5. Address adverse impacts from the transportation of minerals 6. Restore mineral workings to the highest standards
Surrey County Council Local Transport Plan ³	Surrey Local Transport Plan – the fourth Local Transport Plan was adopted on 12 July 2022.	LTP4 aims to significantly reduce carbon emissions from transport to meet the county council's commitment to net zero emissions by 2050 through promotion of sustainable and active travel options and choices.
Elmbridge Borough Council	The current Elmbridge Local Plan consists of the Core Strategy (2011) and Development Management Plan (2015). The Core Strategy was adopted in July 2011 ⁴ .	The adopted Core Strategy sets a target of 3,375 homes to 2026.

¹ Surrey Waste Local Plan 2019-2033. Available at: <https://www.surreycc.gov.uk/land-planning-and-development/minerals-and-waste/waste-plan> [Date Accessed: 11/01/23]

² Surrey Minerals Plan (2011) Available at: https://www.surreycc.gov.uk/_data/assets/pdf_file/0007/81439/Adopted-Core-Strategy-Development-Plan-Document.pdf [Date Accessed: 11/01/23]

³ Surrey Local Transport Plan, Available at: <https://www.surreycc.gov.uk/roads-and-transport/policies-plans-consultations/transport-plan/why-we-need-plan> [Date Accessed: 11/01/23]

⁴ Elmbridge Borough Council. 2011. Elmbridge Core Strategy. Available at: <https://www.elmbridge.gov.uk/planning/local-plan/current-policies-and-guidance/core-strategy/> [Date Accessed: 11/01/23]

Plans and Policies	Plan Status	Key Elements of the Plan that Could Cause in-combination Effects
	The Development Management Plan was adopted in April 2015 ⁵ . Elmbridge is currently preparing a new Local Plan and has completed Regulation 18.	
Kingston upon Thames London Borough Council	The Core Strategy was adopted in April 2012 ⁶ . The Council is currently running a consultation on their new Local Plan (Regulation 18) ⁷ .	The Regulation 18 version of the Draft Local Plan sets a target of 9,640 homes between 2019/20 and 2028/29.
Mole Valley District Council	The Core Strategy was adopted in 2009. On 14 February 2022, the Council submitted the Mole Valley Local Plan 2020-37 to the Secretary of State for Levelling Up, Housing and Communities for independent examination ⁸ .	The Regulation 19 version of the new Local Plan sets a target of 6,000 new homes over the plan period 2020-2037.
Sutton Council	Local Plan adopted February 2018 ⁹	The adopted Sutton Local plan sets the following targets. 6,405 homes to 2031 10 additional hectares of land for industrial uses. 23,000m ² additional gross office floorspace.

⁵ Elmbridge Borough Council. 2015. Development Management Plan. Available at: <https://www.elmbridge.gov.uk/planning/local-plan/current-policies-and-guidance/development-management-policies-and-advice-notes/> [Date Accessed: 11/01/23]

⁶ Royal Borough of Kingston upon Thames. 2012. Local Development Framework. Core Strategy. Available at: <https://www.kingston.gov.uk/downloads/file/36/core-strategy> [Date Accessed: 11/01/23]

⁷ Royal Borough of Kingston upon Thames. 2022. Kingston's Local Plan – First Draft. Available at: <https://kingstonletstalk.co.uk/hub-page/draft-local-plan-1> [Date Accessed: 11/01/23]

⁸ Mole Valley District Council. Draft Mole Valley Local Plan 2020 – 2037. Available at: <https://futuremolevalley.org/> [Date Accessed: 11/01/23]

⁹ Sutton Council Local Plan. 2018. Available at: <https://www.sutton.gov.uk/-/the-local-plan> [Date Accessed: 11/01/23]

Plans and Policies	Plan Status	Key Elements of the Plan that Could Cause in-combination Effects
		39,000m ² additional gross retail floorspace. 10,000m ² additional gross floorspace for restaurants, cafes and other food and beverage outlets.
Reigate and Banstead Borough Council	The Core Strategy was adopted in 2014 and reviewed in 2019 ¹⁰ . The Development Management Plan was adopted by the Council in September 2019 ¹¹ .	The adopted Core Strategy set the following targets: 6,900 to 2027 46,000m ² Employment scale and location 25,000m ² comparison floorspace and 11,700m ² convenience floorspace.
Merton Council	The Merton Local Plan comprises the adopted Core Planning Strategy 2011 and Sites and Policies Plan 2014 ¹² . The Council are in the processes of making a new Local Plan. This was submitted to the Secretary of State in December 2021 for examination ¹³ .	The new Local Plan aims to deliver 11,374 additional homes for the period 2022/23 - 2036/37.
Richmond upon Thames London Borough Council	Local Plan was adopted July 2018 ¹⁴ .	The adopted Local Plan (2018) set the following targets: 3,150 homes to 2025 – Adopted Local Plan 2018.

¹⁰ Reigate & Banstead Borough Council. 2014. Core Strategy. Available at: https://www.reigate-banstead.gov.uk/info/20088/planning_policy/1101/development_plan [Date Accessed: 11/01/23]

¹¹ Reigate & Banstead Borough Council. 2019. Development Management Plan. Available at: https://www.reigate-banstead.gov.uk/info/20088/planning_policy/1101/development_plan [Date Accessed: 11/01/23]

¹² Merton Council. 2011. Core Planning Strategy. Available at: <https://www.merton.gov.uk/planning-and-buildings/planning/local-plan> [Date Accessed: 11/01/23]

¹³ Merton Local Plan Examination Library. <https://www.merton.gov.uk/planning-and-buildings/planning/local-plan/newlocalplan/local-plan-submission> [Date Accessed: 11/01/23]

¹⁴ Richmond upon Thames London Borough Council. 2018. Local Plan. Available at: https://www.richmond.gov.uk/local_plan [Date Accessed: 11/01/23]

Plans and Policies	Plan Status	Key Elements of the Plan that Could Cause in-combination Effects
	The Council is in the process of undertaking a plan review. The Regulation 18 version of the Plan was out for consultation in 2021/2022 ¹⁵ .	
Tandridge District Council	The Tandridge District Core Strategy was adopted by the Council in October 2008 ¹⁶ . The Council is in the process of updating the Local Plan. The Local Plan 2033 was submitted for examination 2019 ¹⁷ .	The adopted Core Strategy sets the target of 2,500 homes to 2026. The new Local Plan sets a target of 6,056 homes over the plan period ¹⁸ .
Croydon London Borough Council	Local Plan was adopted February 2018 ¹⁹ .	The adopted Local Plan 2018 sets the following targets: 32,890 homes to 2036. Up to 92,000m ² office floorspace by 2031, located in Croydon Metropolitan Centre.

¹⁵ Richmond upon Thames London Borough Council. 2021. Direction of Travel Consultation and Call for Sites. Available at: https://www.richmond.gov.uk/services/planning/planning_policy/local_plan/draft_local_plan/direction_of_travel [Date Accessed: 11/01/23]

¹⁶ Tandridge District Council. 2008. Tandridge District Core Strategy
<https://www.tandridge.gov.uk/Portals/0/Documents/Planning%20and%20building/Planning%20strategies%20and%20policies/Current%20and%20adopted%20planning%20policies/Core%20strategy/Core-Strategy.pdf>
[Date Accessed: 11/01/23]

¹⁷ Tandridge District Council. 2019. Local Plan 2033. Available at: <https://www.tandridge.gov.uk/Planning-and-building/Planning-strategies-and-policies/Local-Plan-2033-emerging-planning-policies/Local-Plan-2033> [Date Accessed: 11/01/23]

¹⁸ Tandridge District Council. 2019. Regulation 22 Local Plan 2033.
<https://www.tandridge.gov.uk/Portals/0/Documents/Planning%20and%20building/Planning%20strategies%20and%20policies/Local%20plan/Local%20plan%202033/Examination%20library/MAIN%20DOCUMENTS/MD1-Our-Local-Plan-2033-Submission-2019.pdf> [Date Accessed: 11/01/23]

¹⁹ Croydon London Borough Council. 2018. Local Plan. Available at: <https://www.croydon.gov.uk/planningandregeneration/framework/localplan/clppolicies> [Date Accessed: 11/01/23]

Plans and Policies	Plan Status	Key Elements of the Plan that Could Cause in-combination Effects
Woking Borough Council	The Development Plan for Woking (Woking 2027) comprises ²⁰ : Woking Core Strategy (adopted 2012). Development Management Policies Development Plan Document (adopted 2016) Site Allocations Development Plan Document DPD (adopted 2021)	The adopted Core Strategy sets out the following targets: 4,964 dwellings to 2027 93,000m ² of additional retail floorspace 28,000m ² of additional office floorspace 20,000m ² of additional warehouse floorspace.
Guildford Borough Council	The Guildford Local Plan was adopted in 2019 ²¹ .	Guildford Borough Local Plan: Strategy and sites plan sets out the following targets: At least 10,678 additional homes by 2034 Up to 11ha, comprising 30,000m ² of premises for business use (Including offices, research, development and design activities in any science)
Runnymede Borough Council	Runnymede 2030 Local Plan was adopted in 2020 ²² .	The plan has a target of 7,507 net additional dwellings over the plan period and to meet the identified employment need, a business park in the region of 20,000sqm at New Haw and a 79,025sqm (7,350sqm net) office/business park at the Longcross Enterprise Zone are also allocated through the Local Plan. A minimum of 7,540sqm net retail floorspace will also be delivered in the Borough's town centres and a minimum of 60,260 sqm net employment floorspace delivered in the Borough's remaining Strategic Employment Areas.
Spelthorne Borough Council	The Spelthorne Core Strategy and Policies Development Plan Document was adopted in February 2009 ²³ .	The Local Plan review has a target of 9,270 dwellings over the Plan period.

²⁰ Woking Borough Council Woking 2027. Available at: <https://www.woking2027.info/> [Date Accessed: 11/01/23]

²¹ Guildford Borough Council. 2019. Guildford Local Plan: Strategy and Sites (2015 – 2034). Available at: <https://guildford.gov.uk/localplan/2015-2034> [Date Accessed: 11/01/23]

²² Runnymede Borough Council. 2022. Runnymede 2030 Local Plan. Available at: <https://www.runnymede.gov.uk/planning-policy/runnymede-2030-local-plan> [Date Accessed: 11/01/23]

²³ Spelthorne Borough Council. 2009. Core Strategies and Policies DPD. Available at: <https://www.spelthorne.gov.uk/article/17620/Development-Plan-2009> [Date Accessed: 11/01/23]

Plans and Policies	Plan Status	Key Elements of the Plan that Could Cause in-combination Effects
	The Council are currently reviewing the Local Plan. It was submitted to the Secretary of State for examination in November 2022 ²⁴ .	

²⁴ Spelthorne Borough Council. 2022. Spelthorne Pre-Submission Local Plan 2022 - 2037. Available at: <https://spelthornelocalplan.info/> [Date Accessed: 11/01/23]

Appendix B: Habitat Site Conservation Objectives, Qualifying Features, Threats and Pressures

Mole Gap to Reigate Escarpment SAC¹

Conservation objectives:

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

- The extent and distribution of qualifying natural habitats and habitats of qualifying species;
- The structure and function (including typical species) of qualifying natural habitats;
- The structure and function of the habitats of qualifying species;
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely;
- The populations of qualifying species; and
- The distribution of qualifying species within the site.

Qualifying Features:

H4030. European dry heaths

H5110. Stable *xerothermophilous* formations with *Buxus sempervirens* on rock slopes (*Berberidion p.p.*); Natural box scrub

H6210. Semi-natural dry grasslands and scrubland facies: on calcareous substrates (*Festuco-Brometalia*) (important orchid sites); Dry grasslands and scrublands on chalk or limestone (important orchid sites)

H9130. *Asperulo-Fagetum* beech forests; Beech forests on neutral to rich soils H91J0. *Taxus baccata* woods of the British Isles; Yew-dominated woodland

S1166. *Triturus cristatus*; Great crested newt

S1323. *Myotis bechsteinii*; Bechstein's bat

Threats and Pressures at Habitat site which may be affected by Local Plan^{2,3}.

- Air pollution – impact of nitrogen deposition and acid deposition; and
- Public access and disturbance;
- Water quantity and quality;
- Illumination and disturbance from human activity.

¹ Natural England (2018) Mole Gap to Reigate Escarpment SAC Conservation Objectives. Available at: <http://publications.naturalengland.org.uk/file/5690871244914688> [Date Accessed: 14/12/22]

² Natural England. 2014. Site Improvement Plan. Mole Gap to Reigate Escarpment SAC. <http://publications.naturalengland.org.uk/file/6256378880458752> [Date Accessed: 14/12/22].

³ Natural England. 2019 Mole Gap to Reigate Escarpment SAC Conservation Objectives Supplementary Advice. <http://publications.naturalengland.org.uk/file/635445039883878> Available at: [Date Accessed: 14/12/22]

Richmond Park SAC

Conservation objectives:

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

- The extent and distribution of the habitats of qualifying species
- The structure and function of the habitats of qualifying species
- The supporting processes on which the habitats of qualifying species rely
- The populations of qualifying species, and,
- The distribution of qualifying species within the site.

Qualifying Features:

S1083. *Lucanus cervus*; Stag beetle

Threats and Pressures at Habitat site which may be affected by Local Plan⁴.

None identified in SIP.

South West London Waterbodies SPA⁵

Conservation objectives:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring:

- The extent and distribution of the habitats of the qualifying features;
- The structure and function of the habitats of the qualifying features;
- The supporting processes on which the habitats of the qualifying features rely;
- The population of each of the qualifying features; and
- The distribution of the qualifying features within the site.

Qualifying features:

A051 *Anas strepera*; Gadwall (Non-breeding)

A056 *Anas clypeata*; Northern shoveler (Non-breeding)

Threats and Pressures at Habitat site which may be affected by Local Plan^{6,7}.

- Air pollution – impact of nitrogen deposition and acid deposition; and
- Public access and disturbance / disturbance by human activity; and
- Water quantity, depth and quality.

⁴ Natural England. 2019 Richmond Park SAC Conservation Objectives Supplementary Advice.
<http://publications.naturalengland.org.uk/publication/662523283610009> Available at: [Date Accessed: 14/12/22]

⁵ Natural England (2019) South West London Waterbodies SPA Conservation Objectives. Available at:
<http://publications.naturalengland.org.uk/file/5411059804667904> [Date Accessed: 14/12/22]

⁶ Natural England. 2014. Site Improvement Plan. South West London Waterbodies SPA.
<http://publications.naturalengland.org.uk/file/5135484288237568> [Date Accessed: 14/12/22].

⁷ Natural England. 2018 South West London Waterbodies SPA Conservation Objectives Supplementary Advice.
<http://publications.naturalengland.org.uk/file/5893345162821632> Available at: [Date Accessed: 14/12/22]

South West London Waterbodies Ramsar⁸

Ramsar sites do not have the Conservation Objectives in the same way as SPAs and SACs. Information regarding the designation of Ramsar sites is contained in INCC Ramsar Information Sheets. Ramsar Criteria are the criteria for identifying Wetlands of International Importance. The relevant criteria and ways in which this site meets the criteria are presented in the table below.

Ramsar Criterion	Justification for the application of each criterion
6	<p>Ramsar criterion 6 – species/populations occurring at levels of international importance. Qualifying species/populations (as identified at designation): Species with peak counts in spring/autumn:</p> <p>Northern shoveler, <i>Anas clypeata</i>, Northwest and Central Europe - 397 individuals, representing an average of 2.6% of the GB population (5 year peak mean 1998/9-2002/3)</p> <p>Species with peak counts in winter:</p> <p>Gadwall, <i>Anas strepera strepera</i>, Northwest Europe - 487 individuals, representing an average of 2.8% of the GB population (5 year peak mean 1998/9-2002/3).</p>

Threats and Pressures at Habitat site which may be affected by Local Plan.

- None identified in Ramsar information sheet.

⁸ JNCC. 2008. Information Sheet on Ramsar Wetlands. South West London Waterbodies <https://jncc.gov.uk/jncc-assets/RIS/UK11065.pdf>
[Date Accessed: 14/12/22].

Thames Basin Heaths SPA

Conservation objectives:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

- The extent and distribution of the habitats of the qualifying features
- The structure and function of the habitats of the qualifying features
- The supporting processes on which the habitats of the qualifying features rely
- The population of each of the qualifying features, and,
- The distribution of the qualifying features within the site.

Qualifying features:

A224 *Caprimulgus europaeus*; European nightjar (Breeding)

A246 *Lullula arborea*; Woodlark (Breeding)

A302 *Sylvia undata*; Dartford warbler (Breeding)

Threats and Pressures at Habitat site which may be affected by Local Plan⁹.

- Air pollution – impact of nitrogen deposition and acid deposition; and
- Public access and disturbance / disturbance by human activity;
- Wildfire and arson;
- Habitat fragmentation; and
- Hydrological changes.

⁹ Natural England. 2014. Thames Basin Heaths SPA Site Improvement Plan.

<http://publications.naturalengland.org.uk/publication/495285926730137> Available at: [Date Accessed: 14/12/22]

Wimbledon Common SAC

Conservation objectives:

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

- The extent and distribution of qualifying natural habitats and habitats of qualifying species
- The structure and function (including typical species) of qualifying natural habitats
- The structure and function of the habitats of qualifying species
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely
- The populations of qualifying species, and,
- The distribution of qualifying species within the site.

Qualifying features:

H4010. Northern Atlantic wet heaths with *Erica tetralix*; Wet heathland with cross-leaved heath

H4030. European dry heaths

S1083. *Lucanus cervus*; Stag beetle

Threats and Pressures at Habitat site which may be affected by Local Plan¹⁰.

- Air pollution – impact of nitrogen deposition and acid deposition; and
- Public access and disturbance / disturbance by human activity; and
- Habitat fragmentation.

¹⁰ Natural England. 2014. Wimbledon Common SAC Site Improvement Plan.

<http://publications.naturalengland.org.uk/publication/570657128788787> Available at: [Date Accessed: 14/12/22]

Appendix C: Habitats Sites and Corresponding SSSI Conservation Status

Mole Gap to Reigate Escarpment SAC

Habitats Site ¹	No. of SSSIs	Conservation Status of SSSIs ²	Reason for unfavourable status where applicable.
Mole Gap to Reigate Escarpment SSSI	37	22 Favourable	n/a
		13 Unfavourable - recovering	n/a
		1 Unfavourable – no change	Lack of corrective works – Inappropriate scrub control.
		1 Unfavourable-Declining	Scrub invasion.

Richmond Park SAC

Habitats Site	No. of SSSIs	Conservation Status of SSSIs	Reason for unfavourable status where applicable.
Richmond Park SSSI	13	13 – Unfavourable – recovering	Management strategy in place to improve habitats.

South West London Waterbodies SPA and Ramsar

Habitats Site	No. of SSSIs	Conservation Status of SSSIs	Reason for unfavourable status where applicable.
Knight & Bessborough Reservoirs SSSI	1	1 Favourable	n/a
Kempton Park Reservoirs SSSI	2	2 Unfavourable - recovering	Infestation of the invasive plant <i>Crassula hemsii</i> (New Zealand Pygmyweed) is thought to be having adverse effects on feeding conditions for Gadwall.
Staines Moor SSSI	6	4 Favourable	n/a
		1 Unfavourable - recovering	Investigation into the source of the inflow is still required to check water quality.
		1 Unfavourable – declining	Agriculture – inappropriate cutting/mowing and undergrazing. Lack of corrective works – inappropriate weed control.

¹ Sites within a 15km of the Epsom and Ewell Borough Council border.

² Natural England. IIRX <https://designatedsites.naturalengland.org.uk/> [Date Accessed: 16/01/23].

Habitats Site	No. of SSSIs	Conservation Status of SSSIs	Reason for unfavourable status where applicable.
Thorpe Park No.1 Gravel Pit SSSI	1	1 Favourable	n/a
Wraysbury and Hythe End Gravel Pits SSSI	6	6 Favourable	n/a
Wraysbury No.1 Gravel Pit SSSI	1	1 Favourable	n/a
Wraysbury reservoir SSSI	1	1 Favourable	n/a

Thames Basin Heaths SPA

Habitats Site	No. of SSSIs	Conservation Status of SSSIs	Reason for unfavourable status where applicable.
Ash to Brookwood Heaths SSSI	12	6 Favourable	n/a
		1 Unfavourable – no change	Lack of corrective works – inappropriate weed and scrub control.
		5 Unfavourable – recovering	Habitat management in progress.
Bourley and Long Valley SSSI	6	2 Favourable	n/a
		4 Unfavourable – recovering	Management such as grazing is helping to restore areas.
Bramshill SSSI	4	3 Favourable – recovering	n/a
		1 Unfavourable – no change	Agriculture – undergrazing.
Broadmoor to Bagshot Woods and Heaths SSSI	13	7 Favourable	n/a
		5 Unfavourable - recovering	Area would benefit from increased grazing and provision of suitable habitat for nesting birds.
		1 Unfavourable – no change	Lack of corrective works – inappropriate scrub control.
Castle Bottom to Yateley and Hawley Commons SSSI	14	4 Favourable	n/a
		6 Unfavourable - recovering	Clearance of woodland is a step towards restoration of heathland (unit 4).
		4 Unfavourable – no change	Agriculture – undergrazing. Lack of corrective works – inappropriate scrub control.
Chobham Common SSSI	26	13 Favourable	n/a
		13 Unfavourable - recovering	On-going management required.
Colony Bog and Bagshot Heath SSSI	17	12 Favourable	n/a
		3 Unfavourable – recovering	Work to restore habitat and remove invasive species to continue.

Habitats Site	No. of SSSIs	Conservation Status of SSSIs	Reason for unfavourable status where applicable.
		2 Unfavourable-declining	Lack of corrective works - inappropriate scrub control.
Eelmoor Marsh SSSI	3	3 Favourable	n/a
Hazeley Heath SSSI	4	4 Unfavourable – recovering	Not all targets are being met.
Heath Brow SSSI	1	1 Favourable	n/a
Horsell Common SSSI	6	2 Favourable	n/a
		4 Unfavourable - recovering	Management of area is underway; some areas of heath need to be increased.
Ockham and Wisley Commons SSSI	9	6 Favourable	n/a
		3 Unfavourable - recovering	Habitat recovering following removal of tree cover and other restoration works.
Sandhurst to Owlsmoor Bogs and Heaths SSSI	3	3 Unfavourable - recovering	Some targets have been met.
Whitmoor Common SSSI	9	6 Favourable	n/a
		2 Unfavourable – recovering	Receiving high levels of management to control invasive scrub and bracken.
		1 Unfavourable – no change	Freshwater – siltation.

Wimbledon Common SAC

Habitats Site	No. of SSSIs	Conservation Status of SSSIs	Reason for unfavourable status where applicable.
Wimbledon Common SSSI	5	4 Unfavourable – recovering	Woodland management is underway to restore habitats.
		1 Unfavourable – no change	Agriculture – inappropriate cutting/mowing.

Appendix D: Local Plan Pre-Screening

Chapter 1 – 2 – Introductions and Context

Policy number / name	Description of policy	Assessment of LSEs	Screening conclusion (Screening Category – Table 4.1) and recommendations
Chapter 1 – About this consultation	This chapter contains administrative text.	No LSEs	Screen out Administrative text
Chapter 2 – Introduction and context	This chapter contains administrative and introduction text.	No LSEs	Screen out Administrative text

Chapter 3 - Vision and Objectives

Policy number / name	Description of policy	Assessment of LSEs	Screening conclusion (Screening Category – Table 4.1) and recommendations
Vision	This sets out a vision for the borough up to 2040.	This is a general statement and aspiration for the Local Plan and will not trigger development or other change which may result in a LSE.	Screened out Category A

Policy number / name	Description of policy	Assessment of LSEs	Screening conclusion (Screening Category – Table 4.1) and recommendations
Objectives	The Local Plan contains nine objectives to deliver the vision.	These are a general statement and aspiration for the Local Plan and will not trigger development or other change which may result in a LSE.	Screened out Category A

Chapter 4 – Spatial Policies

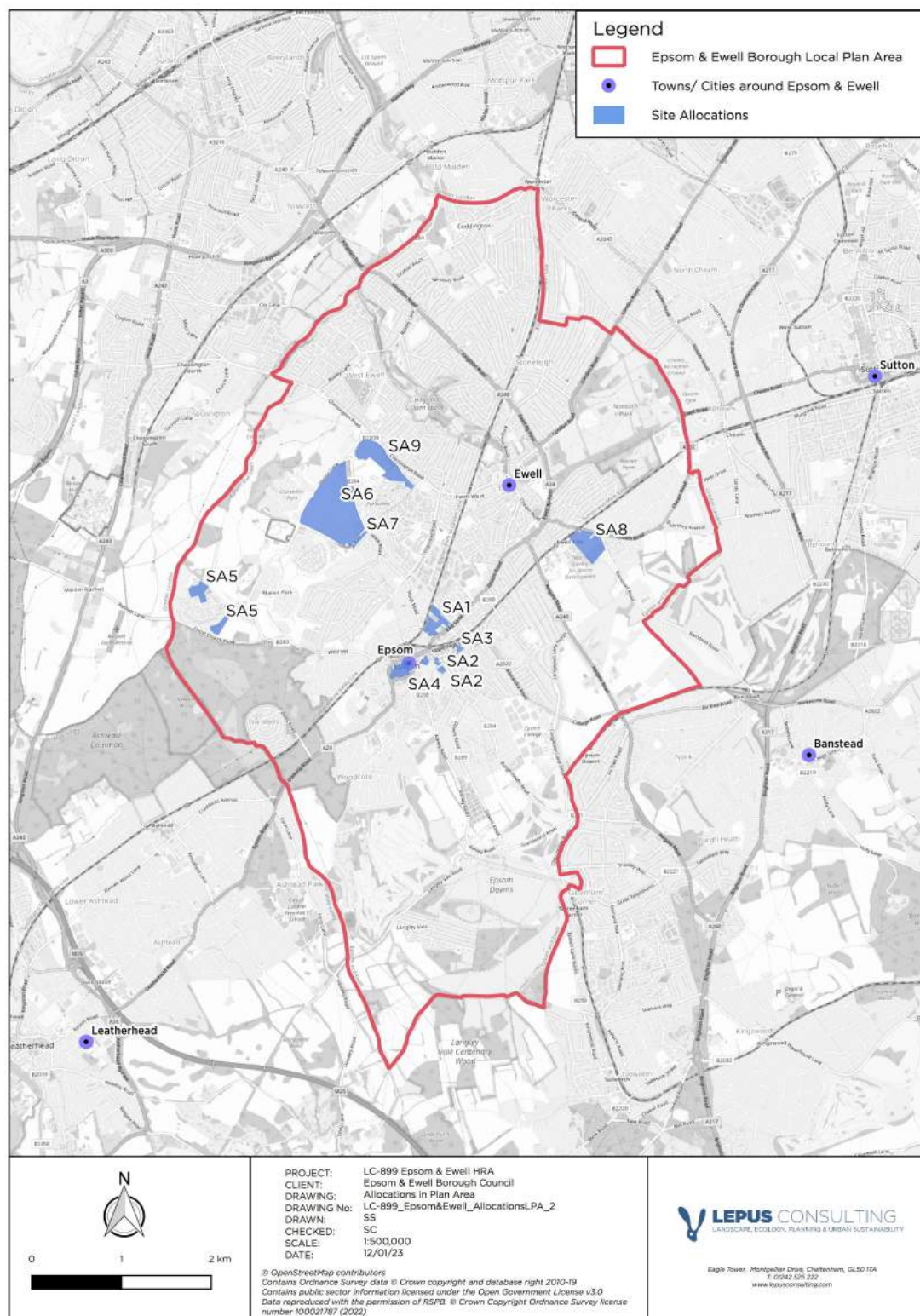
Policy number / name	Description of policy	Assessment of LSEs	Screening conclusion (Screening Category – Table 4.1) and recommendations
Policy S1: Spatial Strategy	This policy identifies the quantum of development required over the Plan period (2022-2040), making provision for at least 5,400 new homes. Employment needs (office, light industrial, industrial and warehousing) will be met through the intensification of existing strategic employment sites and the delivery of additional employment floorspace that is compatible with residential use in Epsom Town Centre. Retail needs will be met within existing centres and through the provision of small-scale retail facilities within the Ewell East Station strategic allocation. Provision will be made for 18 permanent pitches for Gypsies and Travellers within Epsom and Ewell over the plan period. This will be achieved through the	<p>This policy will trigger development and change within the Plan area with the following potential pathways of impact:</p> <ul style="list-style-type: none"> - Changes to air quality (Mole Gap to Reigate Escarpment SAC, Thames Basin Heaths SPA and Wimbledon Common SAC); - Impacts upon functionally linked land (Mole Gap to Reigate Escarpment SAC); - Hydrological impacts (Wimbledon Common SAC); and - Recreational impacts (Mole Gap to Reigate Escarpment SAC). 	Screened in Category I

Policy number / name	Description of policy	Assessment of LSEs	Screening conclusion (Screening Category – Table 4.1) and recommendations
	allocation of a minimum of 10 pitches, with additional provision to be provided by permitting planning permission on suitable sites.		
Policy S2: Sustainable and Viable Development	This policy sets out the provisions for sustainable and viable development within the Plan area.	This policy lists a set of sustainability criteria which development must meet.	Screened out Category B
Policy S3: Making Efficient Use of Land	This policy sets out the requirements for development to make efficient use of land.	This policy lists a set of criteria which development must meet.	Screened out Category B
Policy S4: Development in Green Belt	This policy sets out protections for Green Belt land.	This policy will not trigger new development or any change which would result in a LSE.	Screened out Category F
Policy S5: Climate Change and Mitigation	This policy sets out a set of criteria which development must meet to address climate change.	This policy lists a set of criteria which development must meet.	Screened out Category B

Chapter 5 - Planning for Places

The locations of site allocations are illustrated in **Figure D.1** below.

Figure D.1: Plan of allocation locations



Policy number / name	Description of policy	Assessment of LSEs	Screening conclusion (Screening Category – Table 4.1) and recommendations
Site SA1: Hook Road Car Park and SGN Site	<p>This policy is for a residential led mixed use development of this brownfield site, comprising the following:</p> <ul style="list-style-type: none"> - At least 640 new homes - Student Accommodation (potential for about 400 student rooms) - Mixed use ground floor active frontages accommodating space for office, retail and creative start-ups. - Performing Arts Centre - Café - Building heights ranging between 2 and 7 storeys - Two-level podium parking with smart technology solution allowing different users to access spaces at different times of the day/evening - Provision of a new public square adjacent to the leisure centre entrance - A neighbourhood park in the heart of the development with direct connection to the existing Public Rights of Way network - Relocated SGN infrastructure - Improved public realm and connectivity within the site and to adjoining areas 	<p>This policy will trigger development and change within the Plan area with the following potential pathways of impact cumulatively with other development in the Local Plan and in-combination with other plans and projects:</p> <ul style="list-style-type: none"> - Changes to air quality (Mole Gap to Reigate Escarpment SAC, Thames Basin Heaths SPA and Wimbledon Common SAC); - Impacts upon functionally linked land (Mole Gap to Reigate Escarpment SAC); - Hydrological impacts (Wimbledon Common SAC); and - Recreational impacts (Mole Gap to Reigate Escarpment SAC). 	Screened in Category L
Site SA2: Town Hall, Hope Lodge and Epsom Clinic	<p>This policy is for a residential development of these brownfield sites, comprising the following:</p> <ul style="list-style-type: none"> - A new residential area focused around Dulshot Green - At least 90 new homes - The total redevelopment of Town Hall, Hope Lodge Car Park and Epsom Clinic - Building heights ranging between 2 and 4 storeys 	As above	Screened in Category L

Policy number / name	Description of policy	Assessment of LSEs	Screening conclusion (Screening Category – Table 4.1) and recommendations
	<ul style="list-style-type: none"> - The reprovision of some public parking on the Town Hall site 		
Site SA3: Depot Road and Upper High Street	<p>This brownfield site is allocated for residential development comprising the following:</p> <ul style="list-style-type: none"> - At least 100 new homes - The reprovision of public parking by the provision of a decked car park including 1x basement level and 4x above ground levels on Depot Road. - New access road - Building heights ranging between 2 and 4 storeys 	As above	Screened in Category L
Site SA4: Ashley Centre and Global House	<p>This brownfield site is allocated for mixed-use development comprising the following:</p> <ul style="list-style-type: none"> - The retention and refurbishment of the Ashley Centre - The redevelopment of Global House to provide at least 70 homes - Building heights between 5-8 storeys - Retention of the Playhouse - Maintaining existing planting and green verge along Ashley Avenue - Retention of the Multi Storey Public Car Park 	As above.	Screened in Category L
Site SA5: Land at West Park Hospital	<p>These two brownfield sites are allocated for residential development comprising the following:</p> <ul style="list-style-type: none"> - Approximately 150 dwellings - A target of 5% of homes to be provided through the provision of serviced plots of land for self-build and/or custom-build homes 	As above.	Screened in Category L

Policy number / name	Description of policy	Assessment of LSEs	Screening conclusion (Screening Category – Table 4.1) and recommendations
	<ul style="list-style-type: none"> Floorspace to support NHS services (if required) 		
Site SA6: Horton Farm (Greenfield)	<p>This greenfield site is allocated for residential led development comprising the following:</p> <ul style="list-style-type: none"> A minimum of 1,500 net zero carbon dwellings A target of 5% of homes to be provided through the provision of serviced plots of land for self-build and/or custom-build homes A minimum of 10 serviced gypsy and traveller pitches Public open space Green corridor / habitat enhancements 	As above.	Screened in Category L
Site SA7: Land at Chantilly Way (Greenfield)	<p>This greenfield site is allocated for residential led development comprising at least 25 net zero carbon dwellings.</p>	As above.	Screened in Category L
Site SA8: Land adjoining Ewell East Station (Greenfield)	<p>This greenfield site is allocated for residential led development comprising the following:</p> <ul style="list-style-type: none"> At least 350 net zero carbon dwellings Building heights up to 6 storeys A new local retail centre at ground floor The re-provision of the playing pitches at Hook Road Arena 	As above.	Screened in Category L
Site SA9: Hook Road Arena (Greenfield)	<p>This greenfield site is allocated for residential and sports and recreation development comprising the following:</p> <ul style="list-style-type: none"> A new sports hub for the borough to include playing pitches (grass and artificial) a new pavilion and changing 	As above.	Screened in Category L

Policy number / name	Description of policy	Assessment of LSEs	Screening conclusion (Screening Category – Table 4.1) and recommendations
	<p>facilities on 9.5ha of the site that will be retained within the Green Belt.</p> <ul style="list-style-type: none"> - At least 150 net zero carbon homes on the eastern part of the site that will be inset from the Green Belt 		

Chapter 6 – Homes for all

Policy number / name	Description of policy	Assessment of LSEs	Screening conclusion (Screening Category – Table 4.1) and recommendations
Policy S6: Housing Mix and Type	This policy sets out requirements for development in terms of housing mix and type to be provided.	This policy will not trigger new development or any change which would result in a LSE.	Screened out Category F
Policy S7: Affordable Housing	This policy sets out requirements for development in terms of affordable housing to be provided.	This policy will not trigger new development or any change which would result in a LSE.	Screened out Category F
Policy DM1: Residential Standards	This policy sets out design requirements for development. It provides guidance on water efficiency standards of 110L/d/person.	This policy will not trigger new development or any change which would result in a LSE.	Screened out Category F
Policy S8: Specialist Housing	This policy sets out requirements for specialist housing.	This policy will not trigger new development or any change which would result in a LSE.	Screened out Category F

Policy DM2: Loss of Housing	This policy sets out circumstances where the loss of housing may be permitted.	This policy will not trigger new development or any change which would result in a LSE.	Screened out Category F
Policy S9: Gypsies, Travellers and Travelling Showpeople	This policy sets out the land to be safeguarded for existing supply and where development proposals would be permitted and criteria that would be used to determine applications.	This policy does not include any gypsy, traveller or travelling showpeople allocations. It will therefore not trigger new development or any change which would result in a LSE.	Screened out Category F

Chapter 7 – Economy

Policy number / name	Description of policy	Assessment of LSEs	Screening conclusion (Screening Category – Table 4.1) and recommendations
Policy S10: Retail Hierarchy and Network	This policy sets out the retail hierarchy.	This policy will not trigger new development or any change which would result in a LSE.	Screened out Category F
Policy DM3: Primary Shopping Areas and Retail Frontages	This policy identifies a Primary Shopping Area (PSA) where the Council considers retail uses should remain. It also identifies primary and secondary retail frontages with the PSA.	This policy will not trigger new development or any change which would result in a LSE.	Screened out Category F
Policy DM4: Edge of Centre or Out of Centre Proposals	This policy sets out tests which will apply to protect trading performance across the Plan area.	This policy will not trigger new development or any change which would result in a LSE.	Screened out Category F
Policy DM5: Neighbourhood	This policy sets out circumstances in which development proposals will be considered in neighbourhood parades and at isolated shops.	This policy will not trigger new development or any change which would result in a LSE.	Screened out Category F

Policy number / name	Description of policy	Assessment of LSEs	Screening conclusion (Screening Category – Table 4.1) and recommendations
Parades and Isolated Shops			
Policy S11: Economic development	This policy designates Strategic Employment Sites at Kiln Lane Industrial Estate and Longmead Industrial Estate and safeguards them for employment uses.	This policy will not trigger new development or any change which would result in a LSE.	Screened out Category F
Policy DM6: Equestrian and Horse Racing Facilities	This policy sets out planning permission requirements for equestrian and horse racing facilities.	This policy will not trigger new development or any change which would result in a LSE.	Screened out Category F
Policy DM7: Visitor Accommodation	This policy sets out criteria for visitor accommodation.	This policy will not trigger new development or any change which would result in a LSE.	Screened out Category F

Chapter 8 – Built and Natural Environment

Policy number / name	Description of policy	Assessment of LSEs	Screening conclusion (Screening Category – Table 4.1) and recommendations
Policy S12: Design	This policy sets out design criteria for all development.	This policy will not trigger new development or any change which would result in a LSE.	Screened out Category F

Policy number / name	Description of policy	Assessment of LSEs	Screening conclusion (Screening Category – Table 4.1) and recommendations
Policy S13: Protecting the Historic Environment	This policy sets out protections for the historic environment.	This policy is a plan wide environmental protection policy and will not trigger new development or any change which would result in a LSE.	Screen out Category D
Policy DM8: Heritage Assets	This policy sets out protections for heritage assets.	This policy is a plan wide environmental protection policy and will not trigger new development or any change which would result in a LSE.	Screen out Category D
Policy DM9: Shopfronts and Signage	This policy sets out requirement for shopfront and signage design for new development, in particularly where in an area of historic / heritage importance.	This policy is a plan wide environmental protection policy and will not trigger new development or any change which would result in a LSE.	Screen out Category D
Policy DM10: Landscape Character	This policy sets out protections for landscape character.	This policy is a plan wide environmental protection policy and will not trigger new development or any change which would result in a LSE.	Screen out Category D
Policy S14: Biodiversity	This policy sets out protections and enhancements for biodiversity. It specifically notes that there will be no adverse effect on the integrity of international designated sites (which include Habitats sites).	This policy is a plan wide environmental protection policy and will not trigger new development or any change which would result in a LSE. It also provides protection to Habitats sites specifically.	Screen in Category M
Policy DM11: Trees, Woodlands and Hedgerows	This policy sets out protections for trees, woodlands and hedgerows.	This policy is a plan wide environmental protection policy and will not trigger new development or any change which would result in a LSE.	Screen out Category D
Policy S15: Flood Risk and	This policy sets out requirements for management and reduction of flood risk and requirements for implementation of sustainable drainage systems (SuDS).	This policy is a plan wide environmental protection policy and will not trigger new development or any change which would result in a LSE.	Screen out Category D Recommendation:

Policy number / name	Description of policy	Assessment of LSEs	Screening conclusion (Screening Category – Table 4.1) and recommendations
Sustainable Drainage			It may be beneficial to reference the benefits of SuDS in the protection of water quality and links to GI.
Policy DM12: Pollution and Contamination	This policy sets out requirements for identification and improvements in pollution (soil, contaminated land, water quality, air quality, noise and vibration and light).	This policy is a plan wide environmental protection policy and will not trigger new development or any change which would result in a LSE.	Screen out Category D

Chapter 9 – Infrastructure

Policy number / name	Description of policy	Assessment of LSEs	Screening conclusion (Screening Category – Table 4.1)
Policy S16: Infrastructure Delivery	This policy sets out requirements for development to contribute to infrastructure and information on scale, timings and delivery.	This policy will not trigger new development or any change which would result in a LSE.	Screened out Category F
Policy S17: Green Infrastructure	This policy sets out requirements for development to protect and enhance green infrastructure.	This policy will not trigger new development or any change which would result in a LSE.	Screened out Category F

Policy number / name	Description of policy	Assessment of LSEs	Screening conclusion (Screening Category – Table 4.1)
			Recommendations: It may be beneficial to take into consideration Natural England's Green Infrastructure Principles and Standards ¹ .
Policy DM13: Community and Cultural Facilities	This policy supports the safeguarding of existing community and cultural facilities and delivery of additional facilities to meet need.	This policy will not trigger new development or any change which would result in a LSE.	Screened out Category F
Policy DM14: Education Infrastructure	This policy sets out circumstances where development for intensification, enhancement and maximisation of use of education infrastructure will be supported.	This policy will not trigger new development or any change which would result in a LSE.	Screened out Category F
Policy DM15: Open Space, Sport and Recreation	This policy ensures the range and quality of existing open space, sport and recreation provision is maintained and improved where needs are identified.	This policy will not trigger new development or any change which would result in a LSE.	Screened out Category F
Policy S18: Transport	This policy promotes the inclusion, facilities and connection to sustainable and active travel options in new development	This policy will not trigger new development or any change which would result in a LSE.	Screened out Category F

¹ <https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx>

Policy number / name	Description of policy	Assessment of LSEs	Screening conclusion (Screening Category – Table 4.1)
Policy DM16: Digital Infrastructure and Communications	This policy provides assessment criteria and guidance regarding future telecommunications and utilities equipment for development.	This policy will not trigger new development or any change which would result in a LSE.	Screened out Category F

Habitats Regulations Assessments

Sustainability Appraisals

Strategic Environmental Assessments

Landscape Character Assessments

Landscape and Visual Impact Assessments

Green Belt Reviews

Expert Witness

Ecological Impact Assessments

Habitat and Ecology Surveys



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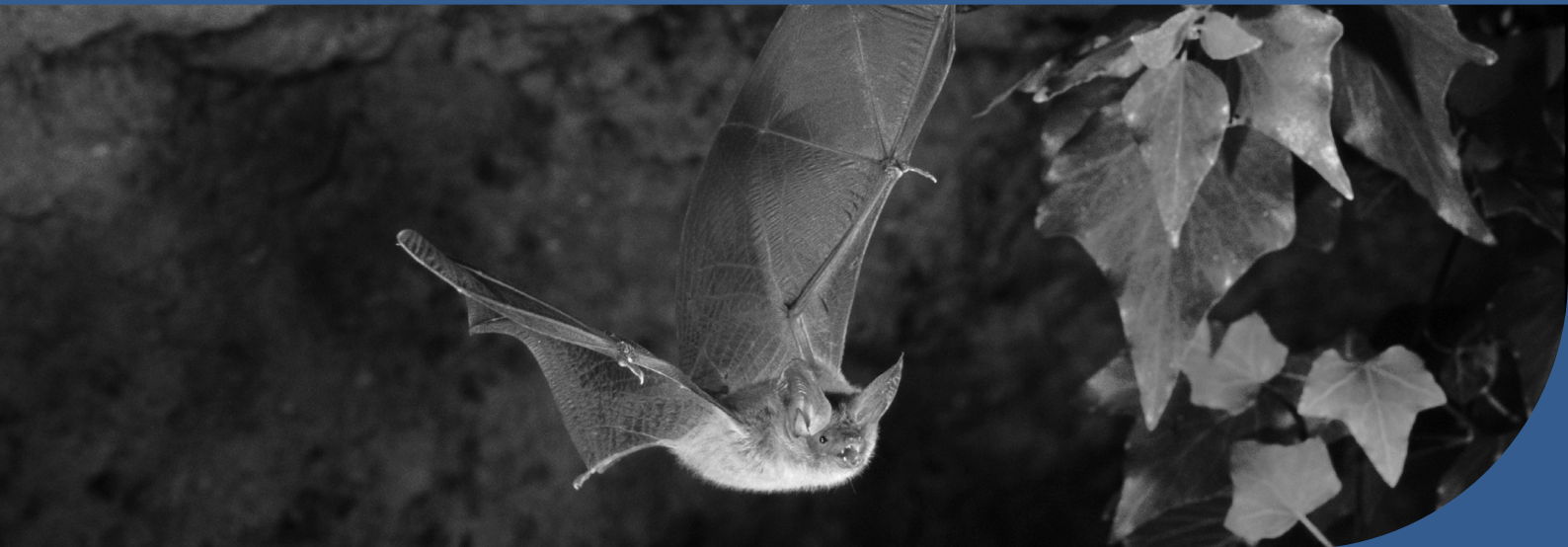
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