

# Habitats Regulations Assessment (HRA)

Screening of the  
Site Allocations DPD and  
Lewisham Town Centre Area Action Plan DPD  
at pre-submission stage

January 2012





## Executive summary

This report sets out the results of a Habitats Regulations Assessment screening exercise undertaken on the Lewisham Local Development Framework Site Allocations Development Plan Document and the Lewisham Town Centre Area Action Plan at pre-submission stage, in compliance with the Habitats Directive (92/43/EEC) and the Regulations. The report assesses whether the two DPDs are likely to have any significant effects, either alone or in combination with other plans or projects, on any designated European Sites in proximity to the borough area. European Sites (known as the 'Natura 2000' network) consist of Special Areas of Conservation and Special Protection Areas of exceptional importance for rare, endangered or vulnerable natural habitats and species.

**Section 1 Introduction** outlines the purpose of the screening exercise and provides details of the methodology used in order to establish the potential impacts of the two land use plans on European Sites in proximity to the borough area.

**Section 2 Identification and description of European Sites** identifies Richmond Park, Wimbledon Common and Epping Forest Special Areas of Conservation and the Lee Valley Special Protection Area for screening purposes. Key habitats, species, qualifying features, conservation objectives, current condition and key ecosystem factors are presented.

**Section 3 Screening of the plans** provides details of the results of the screening by allocating the most appropriate category (or categories) describing the likely effect that the site allocations and policies set out in the proposed submission plans, would have on the relevant European Sites. This includes in combination and cumulative effects.

**Section 4 Conclusions** observes that none of the proposed site allocations contained in either plan are located on or immediately adjacent to a European Site. Further none of the policies in either plan at pre-submission stage, on their own or in combination with other plans or projects, are likely to result in significant adverse impacts on European Sites. In particular, the proposed site allocations policies are unlikely to result in a significant effect on the primary reasons for the designation of the European Sites and there is therefore no need to undertake Task 2 and Task 3 of the Habitats Regulations process.

<b>1. INTRODUCTION .....</b>	<b>4</b>
1.1 PURPOSE OF HABITATS REGULATIONS ASSESSMENT .....	4
1.2 LEWISHAM LOCAL DEVELOPMENT FRAMEWORK .....	4
1.3 LEWISHAM SITE ALLOCATIONS DPD AND LEWISHAM TOWN CENTRE AAP .....	5
1.4 REQUIREMENT TO UNDERTAKE HABITATS REGULATION ASSESSMENT.....	7
1.5 OVERVIEW OF METHODOLOGY.....	8
1.6 CONSULTATION WITH NATURAL ENGLAND.....	10
<b>2. IDENTIFICATION AND DESCRIPTION OF EUROPEAN SITES .....</b>	<b>11</b>
<b>3. SCREENING OF THE PLANS .....</b>	<b>18</b>
3.1 SITE ALLOCATION AND POLICY SCREENING.....	18
3.2 ASSESSMENT OUTCOMES.....	26
3.3 OTHER PLANS AND PROJECTS THAT MAY ACT IN COMBINATION.....	27
<b>4. CONCLUSION.....</b>	<b>29</b>
<b>APPENDIX 1 CORE STRATEGY SPATIAL AREAS .....</b>	<b>30</b>

# 1. Introduction

## 1.1 Purpose of Habitats Regulations Assessment

The purpose of this report is to document the process and findings undertaken by the London Borough of Lewisham of a Habitats Regulations Assessment (HRA) screening exercise of the Lewisham Local Development Framework (LDF) Site Allocations Development Plan Document (SA DPD) and the Lewisham Town Centre Area Action Plan DPD (AAP) at pre-submission stage.<sup>1</sup>

The HRA screening exercise has been undertaken to meet the requirements of *The Conservation of Habitats and Species Regulation 2010*. This report provides the supporting information and technical guidance to inform the decision making process undertaken by the competent authority (London Borough of Lewisham) with respect to whether the DPDs are compliant with the regulations.

The purpose of the HRA is to assess whether any of the site allocations or policies currently being developed for inclusion in the SA DPD and the AAP are likely to have significant effects, either alone or in combination with other plans or projects, on the protection or integrity of any designated European Site within or adjacent to the plans area. European Sites (known as the 'Natura 2000' network) consist of Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) of exceptional importance for rare, endangered or vulnerable natural habitats and species, located within the European Union.

This report has been prepared having regard to draft guidance issued by Natural England which complements guidance issued by the Department for Communities and Local Government.<sup>2</sup> This suggests the following three stage process:

- Stage 1 - Assess the likely significant effects (screening)
- Stage 2 - Appropriate Assessment and ascertaining the effect on site integrity and
- Stage 3 - Mitigation measures and alternative solutions.

## 1.2 Lewisham Local Development Framework

Local development framework or LDF is a generic term used to describe the portfolio of planning documents, prepared by Lewisham Council, which collectively deliver the borough's planning strategy. Preparation of such documents is a requirement of the *Planning and Compulsory Purchase Act 2004* and LDF documents need to be in general conformity with the London Plan<sup>3</sup>. The documents included as part of the Lewisham LDF are either procedural or policy based. HRA is only required for Lewisham's policy based documents, which are listed below.

- Development Plan Documents (DPDs) which include the following:
  - [Core Strategy](#)
  - [Site Allocations](#)
  - [Development Management](#)

---

<sup>1</sup> Both of the proposed submission DPDs are scheduled for public consultation in April/May 2012

<sup>2</sup> Revised Draft Guidance The Habitats Regulations Assessment of Local Development Documents, Natural England (2009) and Planning for the Protection of European Sites: Appropriate Assessment, Guidance for Regional Spatial Strategies Local Development Documents, DCLG (2006)

<sup>3</sup> Replacement London Plan adopted July 2011

- Area Action Plans for the [Lewisham](#) and [Catford](#) town centres
- [Supplementary Planning Documents](#) providing further detail to the policies contained in the DPDs listed above

All LDF policy documents are subject to consultation during the preparation period. DPDs are required to be examined by an independent Planning Inspector prior to approval while SPDs are approved by the Council itself.

The Core Strategy (the principal and over arching LDF document) was subject to HRA and was submitted for Examination in October 2010. The Core Strategy was found sound by an independent Planning Inspector. It was adopted by the Lewisham Mayor and Cabinet on 11 May and the Full Council on 29 June 2011.

The Development Management DPD (DM DPD) was initially part of a combined Development Policies and Site Allocations DPD (2005) for which a [scoping report](#) was prepared and publically consulted in May 2005. Since that time a decision has been made to separate the two DPDs; one for site allocations and the other for development management policies. Further options are currently being prepared for the DM DPD and consultation will take place in 2012.

### **1.3 Lewisham Site Allocations DPD and Lewisham Town Centre AAP**

#### ***Site Allocations DPD***

The SA DPD sets out the preferred sites to deliver policies of the Core Strategy. Designated sites are allocated for residential, employment, retail/town centre, leisure, community, education and waste management uses as well as designating additional Sites of Importance to Nature Conservation (SINC) and open space.

A further options report for the SA DPD was publicly consulted during October to December 2010. The Council is currently preparing a pre-submission or draft plan for publication in Spring 2012. The SA DPD is scheduled to be submitted to the Secretary of State in Summer 2012 and will then be subject to an Examination in Public.

The land use allocated to each site reflects Core Strategy Spatial Policies 1 to 6, which identifies the type and quantity of development acceptable across the borough within four spatial areas. See Appendix 1.

1. Regeneration and Growth Areas covering localities within Lewisham, Catford Deptford, New Cross/New Cross Gate.
2. District Hubs covering the District town centres of Blackheath, Forest Hill, Lee Green and Sydenham and their immediate surrounding residential neighbourhoods.
3. Local Hubs covering Brockley Cross, Hither Green and Bell Green.
4. Areas of Stability and Managed Change for the remaining areas of the borough.

The proportion of housing expected to be provided within each spatial policy area as detailed in the Core Strategy is shown in Table 1.1.



Table 1.1 Housing distribution across the borough

Spatial Policy Area (Location)	Housing provision
1. Regeneration and Growth Areas	14,975
Lewisham Town Centre	(2,600)
Catford Town Centre	(1,750)
Deptford, New Cross (DNX)	(10,625)
(Strategic Site Allocations within DNX)	(9,450)
2. District Hubs	None specified
3. Local Hubs	600
4. Areas of Stability and Managed Change	2,590
<b>Total</b>	<b>18,165</b>

The delivery of housing is expected to be provided as follows.

- 6,250 dwellings in the first five years (2011/12 to 2015/16)
- 7,380 dwellings in years 6-10 (2016/17 to 2020/21) and
- 4,535 dwellings in years 11 to 15 (2021/22 to 2025/26)

The Core Strategy allocated five strategic sites which are central to the achievement of that strategy. The strategic sites are expected to deliver 52 per cent of the borough's total housing provision. They are substantial areas (43.96 ha in total) with the potential to transform the local environment and deliver the Core Strategy's objectives. As the Core Strategy sets out to deliver 18,165 new homes and the strategic sites account for a maximum of 9,450, there are 8,715 homes to be delivered elsewhere in the borough of which 2,600 will be provided within the Lewisham Town Centre.

### **Lewisham Town Centre AAP**

The AAP sets out the detailed planning framework and policies for significant change and conservation to guide development in Lewisham Town Centre. The AAP includes major redevelopment opportunities and major traffic and transport infrastructure changes.

Lewisham Town Centre is planned to be the subject of considerable development over the next 10 years, with the Council aiming to improve the centre's standing within the London-wide retail hierarchy and to provide substantial new housing, retail and leisure/recreational development. The extent of change envisaged makes it essential that a detailed and location specific planning document is in place to guide and manage future changes and to maximise the benefit derived from the expected development. The AAP implements Core Strategy Spatial Policies 1 and 2. Spatial Policy 2 states the following.

#### **Lewisham Town Centre will:**

1. *be designated as a Major town centre, and will be further developed so that by 2026 it achieves Metropolitan status on the London-wide retail hierarchy and continues to contribute to the local night-time economy*
2. *accommodate up to 40,000 sq.m of additional retail floor space and 4,300 sq.m of additional leisure floorspace by 2026*
3. *accommodate up to 1,500 additional new homes by 2016 and a further 1,100 additional new homes by 2026*

4. *contain a Local Employment Location (LEL) at Molesworth Street*
5. *be one of the borough's preferred locations for new office development*
6. *contain a strategic development site, the Lewisham Gateway, which will act as a catalyst for regeneration of the town centre.*

*The Council will prepare an Area Action Plan for the Lewisham Town Centre to ensure the forecast growth is managed and delivered. The Area Action Plan is the implementation and delivery plan for the changes that will occur in the town centre during this period. In particular, it will provide a detailed planning and implementation strategy for major opportunity sites within the town centre.*

Direction about the appropriate scale of housing growth and its distribution across the borough is provided by both the adopted Core Strategy and the London Plan (July 2011). The Core Strategy was prepared in general conformity with the London Plan (2008) however, the review of that plan and the subsequent preparation of the draft replacement London Plan (in 2009 which became the adopted plan in 2011) was considered at all times during the Core Strategy's preparation. Therefore the London Plan 2011 does not present a new context for either the SA DPD or the AAP.

#### **1.4 Requirement to undertake Habitats Regulation Assessment**

The requirement to assess plans or projects is outlined in Article 6(3) and (4) of the European Communities (1992) Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (known as the 'Habitats Directive'). The Habitats Directive established a Europe-wide network of sites known as Natura 2000, which provides for the protection of sites that are of exceptional importance for rare, endangered or vulnerable natural habitats and species within the European Union. These sites also referred to as 'European Sites', consist of Special Areas of Conservation (SACs), Special Protection Areas (SPAs) (designated under the Conservation of Wild Birds Directive (79/409/EEC)) and Offshore Marine Site (OMS). RAMSAR sites (wetlands of international importance) are included as if they are fully designated European Sites for the purpose of considering development proposals that may affect them.

The Habitats Directive was implemented in the UK through the Conservation (Natural Habitats &c) Regulations 1994. The Regulations are responsible for safeguarding designated European Sites and therefore protecting the habitats and species listed in the Annexes of the Directive.

The purpose of undertaking a HRA in the preparation of land use plans is to ensure that the protection and integrity of European Sites is part of the planning process at the regional and local level. The assessment must be appropriate to its purpose under the Habitats Directive (HRA is also known as Appropriate Assessment or AA). In October 2005, the European Court of Justice ruled that AA must be carried out on all land use planning documents in the UK. In response to this ruling, a new section (Part IVA) was inserted into the Habitats Regulations in August 2007 (Regulations 85A-85E), which requires local planning authorities to undertake AA of land use plans in England and Wales in accordance with the Directive.<sup>4</sup>

---

<sup>4</sup> The new section was entitled Appropriate Assessments for Land Use Plans in England and Wales



Articles 6(3) and 6(4) of the Habitats Directive sets out the decision-making tests for plans or projects affecting Natura 2000 sites.

Article 6(3) establishes the requirement for Appropriate Assessment:

*Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public.*

Article 6(4) goes on to discuss alternative solutions, the test of 'imperative reasons of overriding public interest' (IROPI) and compensatory measures:

*If, in spite of a negative assessment of the implications for the site and in the absence of alternative solutions, a plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of social or economic nature, the Member State shall take all compensatory measures necessary to ensure that the overall coherence of Natura 2000 is protected. It shall inform the Commission of the compensatory measures adopted.*

For the purpose of this assessment, the whole process of assessing the effects of a plan on European and Ramsar Sites in Great Britain is referred to as 'Habitats Regulations Assessment' (HRA) with 'Appropriate Assessment' being just one step within the whole process of HRA.

## **1.5 Overview of methodology**

The European Commission has developed guidance which recommends the adoption of a four stage approach to addressing the requirements of Articles 6(3) and (4) of the Habitats Directive for both projects.<sup>5</sup> This is set out below.

### **Stage 1 Formal Screening**

This stage identifies the likely impacts upon a European or Ramsar site of a project or plan, either alone or in combination with other projects or plans, and considers whether these impacts are likely to be significant.

### **Stage 2 Appropriate Assessment (AA)**

Where there are likely significant impacts, this stage considers the impacts of the plan or project on the integrity of the European or Ramsar site of a project or plan, either alone or in combination with other projects or plans, with respect to the sites' structure and function and their conservation objectives. Where there are adverse impacts, it also includes an assessment of the potential mitigation of those impacts.

---

<sup>5</sup> *Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC*, IEC 2002

### **Stage 3 Assessment of alternative solutions**

Where impacts are predicted, this stage examines alternative ways of achieving the objectives of the project or plan that avoid adverse impacts on the integrity of European and Ramsar sites (mitigation measures).

### **Stage 4 Assessment where no alternative solutions exist and where adverse impacts remain**

This stage assesses compensatory measures where it is deemed that the project or plan should proceed for imperative reasons of overriding public interest (IROPI). The guidance does not deal with the assessment of IROPI.

The purpose of Task 1 is to identify whether an emerging plan option is 'likely to have a significant effect' on a European Site within or adjacent to the borough. This task is referred to as 'screening' under the Regulations.

The outcome of screening (Task 1) determines whether Tasks 2 and 3 are required. Under the Regulations, Tasks 2 and 3 are required when, in view of a European Site's conservation objectives, the effect of a land use plan:

- (a) is likely to have a significant impact on a European Site in Great Britain (either alone or in combination with other plans and projects) and
- (b) is not directly connected with or necessary to the management of the site.

In situations where significant indirect impacts of plan implementation could occur within Natura 2000 sites beyond the borough boundary, these remote sites should be considered during Task 1 (screening). If the potential for significant adverse impacts on European Sites is identified during Task 1, the HRA should consider the potential for impacts in more detail and whether alternative measures can be adopted. If there are no viable alternatives, the plan can only be implemented if there are 'imperative reasons of overriding public interest' (Article 6(4)).

This report represents the outcome of Task 1 in relation to the emerging DPDs.

Throughout this report, the following definitions have been used.

- Likely: *'probably, not merely a fanciful possibility'* and
- Significant: *'any effect that may reasonably be predicted as a consequence of a plan or project that may affect the conservation objectives of the features for which the site was designated but excluding trivial and inconsequential effects'*.

A HRA has been undertaken of the London Plan and regard has been had to that work.<sup>6</sup> HRA work was also been undertaken for the Lewisham Core Strategy and this report draws on that work.

---

<sup>6</sup> HRA was prepared for the Consultation Draft Replacement London Plan 2009. The London Plan was adopted in July 2011.

The following guidance has been used within this assessment process.

- Tyldesley, D., 2009, *The Habitats Regulations Assessment of Local Development Documents Revised Draft Guidance for Natural England* Natural England, Sheffield
- Department of Communities and Local Government, 2006, *Planning for the Protection of European Sites: Appropriate Assessment. Guidance for Regional Spatial Strategies and Local Development Documents*, DCLG, London.

## **1.6 Consultation with Natural England**

The Regulations require plan-making authorities to consult the appropriate nature conservation body (Natural England) regarding the assessment within such reasonable time as the plan-making authority may specify. Natural England has stated XXXX (TBC).

## 2. Identification and description of European Sites

There are no designated European sites within the London Borough of Lewisham. Through consultation with Natural England, the European Sites to be included within this assessment were those located within a 15 kilometre radius of the borough boundary and are considered to be in close enough proximity to *potentially* be impacted by the SA DPD and the AAP and therefore necessary to be considered as part of the HRA.

Specific information regarding the key habitats, species, qualifying features, conservation objectives, current condition, sensitivities and threats were acquired. The baseline data was then interpreted in order to identify specific vulnerabilities and areas of concern for each of the European Sites that could be assessed directly against each policy and site allocation in the SA DPD and the AAP.

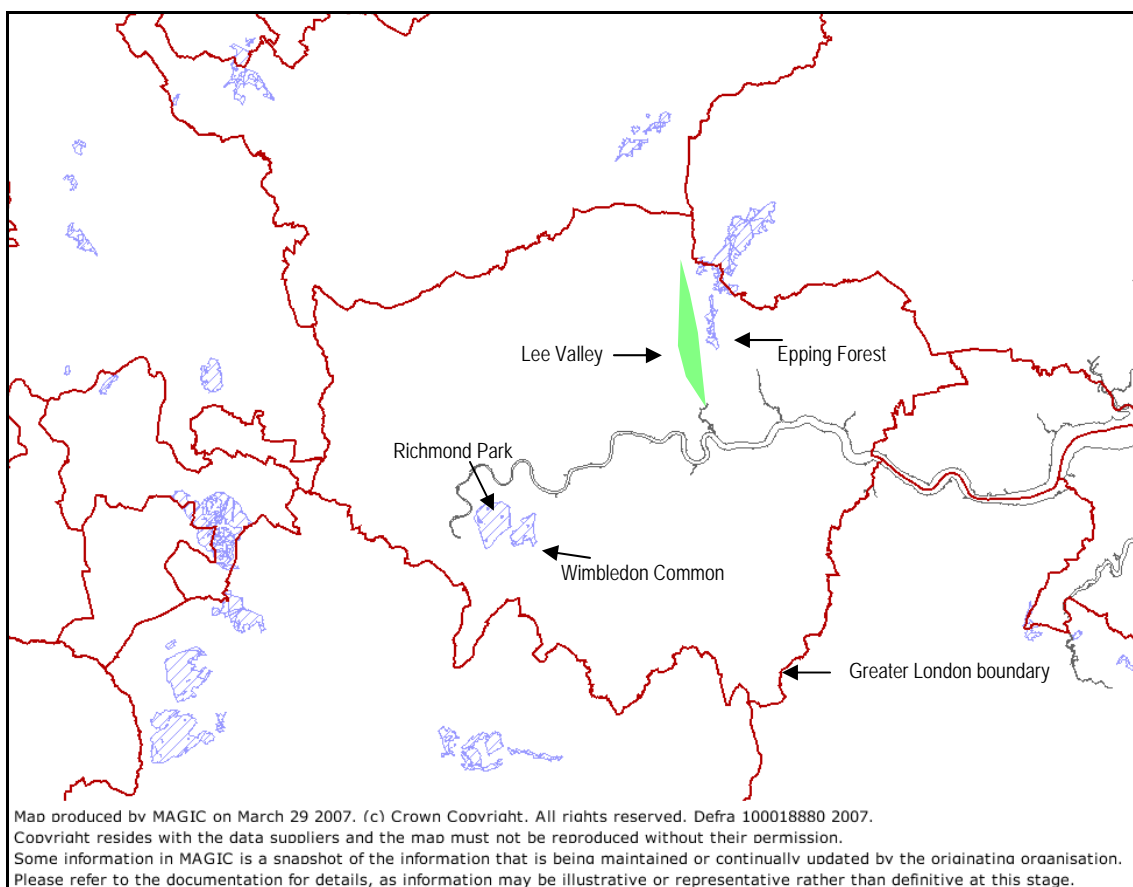
Table 2.1 Designated European Sites within 15 km of LB Lewisham<sup>7</sup>

Site name	Site designation	Site Ref. No
1. Lee Valley	Special Protection Area Ramsar (wetland)	UK9012111 UK11034
2. Richmond Park	Special Areas of Conservation	UK0030246
3. Wimbledon Common	Special Areas of Conservation	UK0030301
4. Epping Forest	Special Areas of Conservation	UK0012720

An overview of each designated site is provided in Table 2.2. A summary of the qualifying habitats/species, conservation objectives, site sensitivities, current condition and threats is provided in Table 2.3. Information is sourced from the Joint Nature Conservation Committee ([www.jncc.gov.uk](http://www.jncc.gov.uk)) and the HRA prepared for the Consultation Draft Replacement London Plan 2009, which was informed by consultation with Natural England. This information highlights the importance of the Lee Valley and Epping Forest sites for their habitats of Atlantic acidophilous beech forests but also the vulnerability of these sites from pollution. All sites are of importance for their species of stag beetle (*Lucanus cervus*) whilst Richmond Park and Wimbledon Common were highlighted as being in urbanised areas and vulnerable to recreational pressures.

<sup>7</sup> Sources:- Joint Nature Conservation Committee ([www.jncc.gov.uk](http://www.jncc.gov.uk)) and [www.magic.gov.uk](http://www.magic.gov.uk)

Map 2.1 Designated European Sites within 15 km of Lewisham



(Source: part [www.magic.gov.uk](http://www.magic.gov.uk) and part LB Lewisham)

Table 2.2 European Site descriptions

European Site name	Reasons for designation
<p><b>1. Lee Valley SPA and Ramsar (wetland)</b></p>	<p>General site character</p> <ul style="list-style-type: none"> <li>• Inland water bodies (standing water, running water) (67%)</li> <li>• Bogs. Marshes. Water fringed vegetation. Fens (4%)</li> <li>• Humid grassland. Mesophile grassland (8%)</li> <li>• Improved grassland (10%)</li> <li>• Broad-leaved deciduous woodland (10%)</li> <li>• Other land (including towns, villages, roads, waste places, mines, industrial sites) (1%)</li> </ul> <p>The Lee Valley SPA and Ramsar (wetland) is located to the north-east of London, where a series of wetlands and reservoirs occupy about 20 kilometres of the valley. The site comprises embanked water supply reservoirs, sewage treatment lagoons and former gravel pits that support a range of man-made, semi-natural and valley bottom habitats. Open water, plus associated wetland habitats including reedbeds, fen grassland and woodland support a number of wetland plant and animal species including internationally important numbers</p>

European Site name	Reasons for designation
	<p>of wintering wildfowl, in particular Gadwall <i>Anas strepera</i> and Shoveler <i>Anas clypeata</i>, which occur in numbers of European importance. Areas of reedbed within the site also support significant numbers of wintering Bittern <i>Botaurus stellaris</i>.</p>
<p><b>2. Richmond Park SAC</b></p>	<p>General site character</p> <ul style="list-style-type: none"> <li>• Inland water bodies (standing water, running water) (1.5%)</li> <li>• Bogs. Marshes. Water fringed vegetation. Fens (0.5%)</li> <li>• Heath. Scrub. Maquis and garrigue. Phygrana (25%)</li> <li>• Dry grassland. Steppes (18%)</li> <li>• Humid grassland. Mesophile grassland (5%)</li> <li>• Improved grassland (20%)</li> <li>• Broad-leaved deciduous woodland (25%)</li> <li>• Mixed woodland (5%)</li> </ul> <p>Richmond Park is located in south west London an has a large number of ancient trees with decaying timber. It is at the heart of the south London centre of distribution for stag beetle <i>Lucanus cervus</i>, and is a site of national importance for the conservation of the fauna of invertebrates associated with the decaying timber of ancient trees.</p>
<p><b>3. Wimbledon Common SAC</b></p>	<p>General site character</p> <ul style="list-style-type: none"> <li>• Inland water bodies (standing water, running water) (1%)</li> <li>• Bogs. Marshes. Water fringed vegetation. Fens (0.5%)</li> <li>• Heath. Scrub. Maquis and garrigue. Phygrana (5%)</li> <li>• Dry grassland. Steppes (45%)</li> <li>• Improved grassland (3.5%)</li> <li>• Broad-leaved deciduous woodland (45%)</li> </ul> <p>Wimbledon Common has a large number of old trees and much fallen decaying timber. It is at the heart of the south London centre of distribution for stag beetle <i>Lucanus cervus</i>. The site supports a number of other scarce invertebrate species associated with decaying timber.</p>
<p><b>4. Epping Forest SAC</b></p>	<p>General site character</p> <ul style="list-style-type: none"> <li>• Inland water bodies (standing water, running water) (6%)</li> <li>• Bogs. Marshes. Water fringed vegetation. Fens (0.2%)</li> <li>• Heath. Scrub. Maquis and garrigue. Phygrana (3.8%)</li> <li>• Dry grassland. Steppes (20%)</li> <li>• Broad-leaved deciduous woodland (70%)</li> </ul> <p>Epping Forest straddles the Essex and east London population centres and represents one of the best examples Atlantic acidophilous beech forests in the north-eastern part of the habitat's UK range. Although the epiphytes at this site have declined, largely as a result of air pollution, it remains important for a range of rare species, including the moss <i>Zygodon forsteri</i>. The long history of pollarding, and resultant large number of veteran trees, ensures that the site is also rich in fungi and dead-wood invertebrates. Records of stag beetle <i>Lucanus cervus</i> are widespread and frequent; and this is a site of national importance for the conservation of the fauna of invertebrates associated with the decaying timber of ancient trees.</p>



Table 2.3 European Site information

Natura 2000 site	Designation code	Qualifying interest <sup>8</sup> (Habitats and species)	Conservation objectives	Site sensitivities	Current condition <sup>9</sup>	Threats
<b>Lee Valley SPA / Ramsar</b> (447.87 ha)	UK9012111 UK11034	<p>SPA:</p> <p>Over winter:</p> <ul style="list-style-type: none"> <li>• Botaurus stellaris (bittern)</li> </ul> <p>Over winter:</p> <ul style="list-style-type: none"> <li>• Anas strepera (gadwall)</li> <li>• Anas clypeata (shoveler)</li> </ul> <p>Ramsar:</p> <p>The site also qualifies as a Ramsar Wetland of assemblage qualification: A wetland of international importance.</p>	<p>The conservation objectives for the European interest on the SSSI are to maintain*, in favourable condition, the habitats for the populations of migratory bird species + of European importance, with particular reference to:</p> <ul style="list-style-type: none"> <li>• open water and surrounding marginal habitats</li> <li>• Gadwall, Shoveler</li> </ul> <p>*maintenance implies restoration if the feature is not currently in favourable condition.</p> <p>The Conservation Objectives for the Lee Valley SPA are, in accordance with para C 10 of PPG9 9, the reasons for which the SPA was classified.</p> <p>The SPA includes land</p>	<ul style="list-style-type: none"> <li>• Water quality - eutrophication is a threat, particularly from point source pollution (e.g. sewage outfalls) but also from surface run-off or groundwater pollution and atmospheric deposition</li> <li>• Water levels – a high and stable water table is fundamental</li> <li>• Disturbance to bird feeding and roosting habitat (noise / visual)</li> <li>• Siltation (e.g. excessive poaching of lake margins by stock, suspended sediments leading to transport of nutrients)</li> </ul>	<p>Walthamstow Reservoirs, Waltham Abbey and Turnford and Cheshunt Pits are 100% favourable.</p> <p>Walthamstow Marshes are 36% favourable and 63% unfavourable but recovering.</p>	<p>Most of the site is in favourable condition, though an increase in recreational use could affect wintering wildfowl numbers.</p> <p>There are currently no factors having a significant adverse effect on the site's character.</p>

<sup>8</sup> Denotes the habitats and species for which the sites have been awarded EU conservation status. It is these features which the HRA must safeguard. Obtained from Natura 2000 and Ramsar forms. The qualifying features form the basis of Natural England's 'conservation objectives' for the European interest on SSSIs', which were drawn up for information.

<sup>9</sup> Natural England July 2006 condition survey

Natura 2000 site	Designation code	Qualifying interest <sup>8</sup> (Habitats and species)	Conservation objectives	Site sensitivities	Current condition <sup>9</sup>	Threats
			within: Amwell Quarry SSSI, Rye Meads SSSI, Turnford and Cheshunt Pits SSSI and Walthamstow Reservoirs SSSI.			
<b>Richmond Park</b> (846.68 ha)	UK0030246	<ul style="list-style-type: none"> <li><i>Lucanus cervus</i> (stag beetle)</li> </ul>	<p>The conservation objectives for the European interest on the SSSI are: to maintain, in favourable condition, the habitats for the population of:</p> <ul style="list-style-type: none"> <li><i>Lucanus cervus</i> (stag beetle)</li> </ul> <p>The conservation objectives for the Richmond Park proposed Special Area of Conservation are, in accordance with para C 10 of PPG 9, the reasons for which the SAC was proposed.</p>	<ul style="list-style-type: none"> <li>Water level</li> <li>Water quality – nutrient enrichment from fertiliser run-off etc.</li> <li>Scrub encroachment (often due to undergrazing)</li> <li>Development pressure</li> <li>Spread of introduced non-native species</li> <li>Human disturbance (off-road vehicles, burning (vandalism))</li> <li>Atmospheric pollution e.g. nitrous oxides from vehicle exhausts</li> </ul>	<p>Area favourable 6%</p> <p>Area unfavourable recovering 8%</p> <p>Area unfavourable no change 86%</p>	Site is surrounded by urban areas and experiences high levels of recreational pressure. This does not directly affect the European interest feature however.
<b>Wimbledon Common SAC</b> (348.31 ha)	UK0030301	<p><i>Lucanus cervus</i> (stag beetle)</p> <p>Annex I habitats present as a qualifying feature, but not a primary reason for selection of</p>	<p>The conservation objectives for the European interest on the SSSI are:</p> <ul style="list-style-type: none"> <li>to maintain*, in favourable condition, the:</li> </ul>	<ul style="list-style-type: none"> <li>Water quality – e.g. pollution through groundwater and surface run-off sources</li> </ul>	<p>Area favourable 40%</p> <p>Area unfavourable but recovering 59%</p>	Site is located in an urban area and experiences intensive recreational

Natura 2000 site	Designation code	Qualifying interest <sup>8</sup> (Habitats and species)	Conservation objectives	Site sensitivities	Current condition <sup>9</sup>	Threats
		<p>this site:</p> <ul style="list-style-type: none"> <li>Northern Atlantic wet heaths with <i>Erica tetralix</i></li> <li>European dry heaths</li> </ul>	<ul style="list-style-type: none"> <li>Northern Atlantic wet heaths with <i>Erica tetralix</i></li> <li>European dry heaths</li> <li>to maintain*, in favourable condition, the habitats for the population of: <ul style="list-style-type: none"> <li>Stag beetle (<i>Lucanus cervus</i>)</li> </ul> </li> </ul> <p>*maintenance implies restoration if the feature is not currently in favourable condition</p>	<ul style="list-style-type: none"> <li>Water level – maintenance of water table</li> <li>Heavy recreational pressure</li> <li>Spread of non-native/invasive species</li> <li>Scrub encroachment</li> <li>Atmospheric pollution (nutrient deposition and acidification)</li> </ul>		<p>pressure which can result in damage, particularly to the sensitive areas of heathland.</p> <p>Air pollution is also thought to be having an impact on the quality of heathland habitat.</p>
<b>Epping Forest SAC</b> (1,604.95 ha)	UK0012720	<p>Annex I habitats that are a primary reason for selection of this site:</p> <ul style="list-style-type: none"> <li>Atlantic acidophilous beech forests with <i>Ilex</i> and sometimes also <i>Taxus</i> in the shrublayer (<i>Quercion robur-petraeae</i> or <i>Ilici-Fagenion</i>)</li> </ul> <p>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:</p> <ul style="list-style-type: none"> <li>Northern Atlantic wet heaths</li> </ul>	<p>The Conservation Objectives for this site are, subject to natural change, to maintain the following habitats and geological features in favourable condition, with particular reference to any dependent component special interest features (habitats, vegetation types, species, species assemblages etc.) for which the land is designated (SSSI, SAC,</p>	<ul style="list-style-type: none"> <li>Water quality – e.g. pollution through groundwater and surface run-off sources</li> <li>Water level – maintenance of water table essential e.g. restrict new drainage ditches around wet woodlands</li> <li>Heavy recreational pressure</li> <li>Spread of non-native/</li> </ul>	<p>Area favourable 30%</p> <p>Area unfavourable recovering 34%</p> <p>% area unfavourable no change 26%</p> <p>% area unfavourable declining 10%</p> <p>Reintroduction of pollarding and wood pasture management</p>	<p>Existing air pollution, particularly arising from traffic is thought to contribute to poor condition of parts of the site.</p> <p>Increasing recreational pressure could have an impact on heathland</p>

Natura 2000 site	Designation code	Qualifying interest <sup>8</sup> (Habitats and species)	Conservation objectives	Site sensitivities	Current condition <sup>9</sup>	Threats
		<p>with <i>Erica tetralix</i></p> <ul style="list-style-type: none"> <li>• European dry heaths</li> </ul> <p>Annex II species that are a primary reason for selection of this site:</p> <ul style="list-style-type: none"> <li>• <i>Lucanus cervus</i> (stag beetle)</li> </ul>	<p>SPA, Ramsar) as individually listed in Table 1. Habitat Types represented (Biodiversity Action Plan categories)</p> <ul style="list-style-type: none"> <li>• Lowland wood pastures and parkland</li> <li>• Broadleaved, mixed and yew woodland</li> <li>• Dwarf shrub heath</li> <li>• Acid grassland</li> <li>• Neutral grassland</li> <li>• Standing open water and canals</li> <li>• Fen marsh and swamp</li> </ul>	<p>invasive species</p> <ul style="list-style-type: none"> <li>• Scrub encroachment</li> <li>• Atmospheric pollution (nutrient deposition and acidification)</li> <li>• Development pressure</li> </ul>	<p>is helping to reverse the decline of the epiphytic bryophyte population.</p>	<p>areas.</p>

### 3. Screening of the plans

#### 3.1 Site allocation and policy screening

Having ascertained the designated European Sites of relevance to this HRA, it is necessary to screen each proposed site allocation and policy contained in the SA DPD and the AAP against a set of criteria in order to identify whether or not the site allocations and policies will have a potentially significant effect on a European Site.<sup>10</sup> Every proposed site allocation and policy was assessed and the relevant criterion/criteria determined for each. Those that fall into one of the following categories have been screened out and do not require further assessment.

- Category A: No negative effect
  - A1 Options / policies that will not themselves lead to development e.g. because they relate to design or other qualitative criteria for development, or it is not a land use planning policy
  - A2 Options / policies intended to protect the natural environment, including biodiversity
  - A3 Options / policies intended to conserve or enhance the natural, built or historic environment, where enhancement measures will not be likely to have any negative effect on a European Site
  - A4 Options / policies that positively steer development away from European Sites and associated sensitive areas
  - A5 Options / policies that could have no effect because no development could occur through the policy itself, the development being implemented through later policies in the same plan, which are more specific and therefore more appropriate to assess for their effects on European Sites and associated sensitive areas

Site allocations and policies that can not be initially screened out are considered further against the following categories:

- Category B: No significant effect  
Elements of the plan / options that could have an effect, but the likelihood is there would be no significant negative effect on a European Site either alone or in combination with other elements of the same plan, or other plans or projects
- Category C: Likely significant effect alone
- Category D: Likely significant effects in combination

Tables 3.1 and 3.2 show the specific categories that have been assigned to each site allocation and policy. Categories B, C and D have not been used in this instance. It is acknowledged that this exercise is subject to value judgements associated with all environmental assessments and although guided by criteria is still subjective.

---

<sup>10</sup> The categories are taken from the following publication - Tyldesley, D., 2009, *The Habitats Regulations Assessment of Local Development Documents Revised Draft Guidance for Natural England* Natural England, Sheffield

Table 3.1: Screening of the site allocations in the Site Allocations DPD

All proposed site allocations are located over 15km from the nearest European Site.

Site allocation number and name		Assessment category	Comment
SA1	New Cross Hospital Site, Avonley Road, New Cross Gate, SE14	A4	Allocated for housing (124 dwellings)
SA2	Seager Buildings, Brookmill Road, Deptford, SE8	A4	Allocated for mixed use housing (278 dwellings) with employment/ commercial and community use
SA3	Giffin Street Redevelopment Area, Deptford, SE8	A4	Allocated for mixed use commercial/creative floorspace, relocation of Tidemill School, relocation of library, housing (238 dwellings) and community use (work/office space and community café)
SA4	Octavius Street and Deptford Station, Deptford High Street, SE8	A4	Allocated for mixed use commercial and housing (115 dwellings); Station redevelopment
SA5	Site between New Cross Station & 267 New Cross Road & 17-29 Goodwood Road, SE14	A4	Mixed use retail, business and housing (90 dwellings)
SA6	New Cross Gate Retail Park (adjoining Sainsbury's Superstore), New Cross Road, SE14	A4	Mixed use retail, housing (200 dwellings), community facilities and a new station access and public space
SA7	Former NDC Site, Kender Estate New Cross Gate, SE14	A4	Allocated for community facilities (including doctor's surgery, library, gym, community hall, café, crèche and public space) with housing (173 dwellings) above
SA8	Childers Street Road MEL, New Cross, SE14	A4	Allocated as a mixed use employment location –Use Class B1 light industrial and offices with housing (84 dwellings)
SA8(a)	Arklow Road MEL, New Cross, SE14	A4	Allocated as a mixed use employment location –Use Class B1 light industrial and offices with housing (100 dwellings)
SA9	Grinstead Road MEL, Deptford, SE8	A4	Allocated as a mixed use employment location –Use Class B1(a) office type uses with housing (199 dwellings)
SA10	Sun and Kent Wharf MEL, Deptford, SE8	A4	Allocated as a mixed use employment location – providing employment uses including creative industries, office and workshops, with housing (200 dwellings)



Site allocation number and name		Assessment category	Comment
SA11	Thanet Wharf MEL, Deptford, SE8	A4	Allocated as a mixed use employment location – providing Use Classes B1 (business), A1 (shops), A3 (restaurants and cafés), A4 (pubs and bars) and housing (226 dwellings)
SA12	Evelyn Street LEL, 2 Evelyn Street, SE8	A4	Allocated as a local employment location (B Uses)
SA13	Creekside LEL, 1-7 & 2-14 Creekside, SE8	A4	Allocated as a local employment location (B Uses)
SA14	Lewisham Way LEL, SE14	A4	Allocated as a local employment location (B Uses)
SA15	Lewisham Bridge School Site, Elmira Street, SE13	A4	Safeguard for new through-school under the Building Schools Future Programme (BSF). Site currently a primary school
SA16	Deptford Green Secondary School Site, Amersham Vale, SE8	A4	Allocated for new public open space (39%) and residential (615 dwellings)
SA17	Site at Waldram Place/Perry Vale including Timber Yard, SE23	A4	Allocated for mixed use retail, business/employment with housing
SA18	Site at Forest Hill Station, incl. car park and storage yard, SE23	A4	Allocated for mixed use retail, business/employment with housing
SA19	Fairway House, Rear of 53 Dartmouth Road, Forest Hill, SE23	A4	Allocated for mixed use retail, business/employment with housing
SA20	O'Rouke Transport/ Sivyer Transport 154-160 Sydenham Road, SE26	A4	Allocated for mixed use employment with housing (29 dwellings)
SA21	113 to 157 Sydenham Road, SE26	A4	Allocated for mixed use retail, employment and housing
SA22	Leegate Centre Lee Green, SE12	A4	Allocated for retail led mixed use including housing, offices and hotel
SA23	Clyde Vale LEL, Forest Hill - comprising Forest Hill Business Centre, SE23	A4	Allocated as a local employment location (B Uses)
SA24	Perry Vale LEL, Forest Hill – comprising Forest Hill Industrial Estate & Postal Sorting Office Perry Vale, SE23	A4	Allocated as a local employment location (B Uses)
SA25	Former Bell Green Gas Works (Phases II & III), Perry Hill Sydenham, SE26	A4	Phase II: Allocated for mixed use business, non-food retail and associated garden centre, restaurant, use of Livesey Memorial Hall as a social club Phase III: Allocated for mixed use housing (156 dwellings) and retail
SA26	Site at 1-6 Coulgate Street, SE4	A4	Allocated for mixed use housing (20 dwellings) with commercial and retention of existing Coulgate Street cottages

Site allocation number and name		Assessment category	Comment
SA27	Site at 6 Mantle Road, SE4	A4	Allocated for mixed use housing (20 dwellings) with commercial
SA28	5 St Norbert Road, SE4	A4	Allocated for mixed use housing (32 dwellings) with commercial
SA29	111 & 115 Endwell Road (Timber Yard and Community College), SE4	A4	Allocated for mixed use housing (41 dwellings) with commercial and retention of church
SA30	72-78 Nightingale Grove, SE13	A4	Allocated for mixed use commercial with housing (62 dwellings)
SA31	Nightingale Mews Estate & adjoining works, 80-84 Nightingale Grove, SE13	A4	Allocated for mixed use housing (30 dwellings) with business
SA32	Driving Test Centre, Nightingale Grove, Hither Green, SE13	A4	Allocated for mixed use business/employment with housing (30 dwellings)
SA33	35 Nightingale Grove, Hither Green, SE13	A4	Allocated for mixed use business/employment with housing (35 dwellings)
SA34	37 To 43 Nightingale Grove, Hither Green, SE13	A4	Allocated for mixed use business/employment with housing (30 dwellings) and retention of existing nursery facility
SA35	9 Staplehurst Road and rear of Leahurst Road (Former Plumb Trade Centre), Hither Green, SE13	A4	Allocated for mixed use business with housing (57 dwellings)
SA36	Endwell Road LEL (Brockley Cross Business Centre, Martins Yard 82a and 84a And 84b Endwell Road SE4 and Martins Yard, 198 Drakefell Road), SE4	A4	Allocated as a local employment location (B Uses)
SA37	16A Algernon Road, SE13	A4	Allocated for housing (34 dwellings)
SA38	Former United Dairies Depot, Baring Road, Lee, SE12 0PW	A4	Allocated for housing (75 dwellings)
SA39	Land off Tyson Road and Honor Oak Road (Rear of Christian Fellowship Centre) Forest Hill, SE23 3AA	A4	Allocated for housing (74 dwellings)
SA40	120, 122a, 136 & 136a Tanners Hill, St Johns, SE8	A4	Allocated for housing (42 dwellings)
SA41	Former Green Man Public House, 355 - 357 Bromley Road, Downham, SE6 2RZ	A4	Allocated for commercial or retail and community space at the ground floor; residential to upper floors
SA42	Former Tiger's Head Public House, 350 Bromley Road, Downham, SE6	A4	Allocated for housing (41 dwellings)
SA43	Deleted site		
SA44	The Former Courts Site, 335-337 Bromley Road, Downham, SE6 2RP	A4	Allocated for mixed use incorporating housing (115 dwellings) and retail

Site allocation number and name		Assessment category	Comment
SA45	Blackheath Hill LEL, SE10 8BA	A4	Allocated as a local employment location (B Uses)
SA46	Manor Lane LEL, 203 Manor Lane, SE12 0TX	A4	Allocated as a local employment location (B Uses)
SA47	Stanton Square LEL – comprising 471-505 Southend Lane, 65Bell Green & Stanton Square Industrial Estate, Stanton Way, SE26	A4	Allocated as a local employment location (B Uses)
SA48	Willow Way LEL – comprising 10-24 & 21-57 Willow Way; Council Offices and Depot at Willow Way; Units 1-8 Willow Business Park; the Church Hall; and 1 Sydenham Park, SE26	A4	Allocated as a local employment location (B Uses)
SA49	Worsley Bridge Road LEL – comprising Broomsleigh Business Par; Kelvin House; & 11B Worsley Bridge Road, SE26	A4	Allocated as a local employment location (B Uses)
SA50	Malham Road LEL – site bounded by Stanstead Road, Wastdale Road, Beadnell Road and Dalmain Road, SE23	A4	Allocated as a local employment location (B Uses)
SA51	Bonus Pastor Catholic College/ Secondary School, Downham, BR1 5PZ	A4	Allocated for education
SA52	Watergate School, Church Road, Ladywell, SE13	A4	Allocated for a gypsy and traveller site
SINC1	Hither Green Cemetery	A2	This allocation is a protective designation supported by Core Strategy Policy 12 which preserves and enhances local biodiversity
SINC2	Pool River Linear Park	A2	This allocation is a protective designation supported by Core Strategy Policy 12 which preserves and enhances local biodiversity
SINC3	Hillcrest Estate Woodlands	A2	This allocation is a protective designation supported by Core Strategy Policy 12 which preserves and enhances local biodiversity
SINC4	Grove Park Nature Reserve	A2	This allocation is a protective designation supported by Core Strategy Policy 12 which preserves and enhances local biodiversity
SINC5	Forster Memorial Park	A2	This allocation is a protective designation supported by Core Strategy Policy 12 which preserves and enhances local biodiversity

Site allocation number and name		Assessment category	Comment
SINC6	Loats Pit	A2	This allocation is a protective designation supported by Core Strategy Policy 12 which preserves and enhances local biodiversity
SINC7	Grove Park Cemetery	A2	This allocation is a protective designation supported by Core Strategy Policy 12 which preserves and enhances local biodiversity
SINC8	Nunhead Cutting	A2	This allocation is a protective designation supported by Core Strategy Policy 12 which preserves and enhances local biodiversity
SINC9	St Johns to Lewisham railsides	A2	This allocation is a protective designation supported by Core Strategy Policy 12 which preserves and enhances local biodiversity
SINC10	Lewisham railway triangles	A2	This allocation is a protective designation supported by Core Strategy Policy 12 which preserves and enhances local biodiversity
SINC11	Hither Green railsides	A2	This allocation is a protective designation supported by Core Strategy Policy 12 which preserves and enhances local biodiversity
SINC12	Hither Green sidings	A2	This allocation is a protective designation supported by Core Strategy Policy 12 which preserves and enhances local biodiversity
SINC13	New Cross and New Cross Gate railsides	A2	This allocation is a protective designation supported by Core Strategy Policy 12 which preserves and enhances local biodiversity
SINC14	Mountsfield Park	A2	This allocation is a protective designation supported by Core Strategy Policy 12 which preserves and enhances local biodiversity
SINC15	Chinbrook Allotments	A2	This allocation is a protective designation supported by Core Strategy Policy 12 which preserves and enhances local biodiversity
SINC16	Chinbrook Meadows	A2	This allocation is a protective designation supported by Core Strategy Policy 12 which preserves and enhances local biodiversity

Site allocation number and name		Assessment category	Comment
SINC17	Bromely Hill Cemetery	A2	This allocation is a protective designation supported by Core Strategy Policy 12 which preserves and enhances local biodiversity
SINC18	Gilmore Road Triangle	A2	This allocation is a protective designation supported by Core Strategy Policy 12 which preserves and enhances local biodiversity
WASTE1	South East London Combined Heat and Power (SELCHP), Landmann Way, SE14	A1 A4	This policy would conserve the natural environment, by seeking the optimal use this existing waste site
WASTE2	Landmann Way, SE14	A1 A4	This policy would conserve the natural environment, by seeking the optimal use this existing waste site
WASTE3	Landmann Way, SE14 (corner of Surrey Canal Road)	A1 A4	This policy would conserve the natural environment, by seeking the optimal use this existing waste site

Table 3.2: Screening of the policies in the Lewisham Town Centre AAP DPD

Policy number and name		Assessment category	Comment
LAAP1	Town centre boundary	A5	This policy establishes the town centre boundary
LAAP2	Spatial strategy	A3 A4 A5	This policy establishes the development pattern for the town centre and seeks to preserve and enhance aspects of the natural, built and historic environment
LAAP3	Kings Hall Mews, Lewisham Gateway	A3 A4	This policy designates this area of the town centre for mixed use including 800 additional dwellings
LAAP4	Loampit Vale Town Centre Area	A3 A4	This policy designates this area of the town centre for mixed use including 1,000 additional dwellings
LAAP5	Conington Road Town Centre Area	A3 A4	This policy designates this area of the town centre for mixed use including 400 additional dwellings
LAAP6	Lee High Road Town Centre Area	A3 A4	This policy designates this area of the town centre for mixed use including 40 additional dwellings
LAAP7	Ladywell Town Centre Area	A3 A4	This policy designates this area of the town centre for mixed use including 150 additional dwellings

Policy number and name		Assessment category	Comment
LAAP8	Central Town Centre Area	A3 A4	This policy designates this area of the town centre for mixed use including 200 additional dwellings
LAAP9	Growing the local economy	A4 A5	This policy outlines criteria for development to support the local economy
LAAP10	Mixed use	A1	This policy will not itself lead to development because it relates to qualitative criteria for development
LAAP11	Employment uses	A4	This policy seeks to ensure employment uses (B Use Class) are provided and retained in the town centre
LAAP12	Conversion of existing buildings	A1	This policy will not itself lead to development because it relates to qualitative criteria for development
LAAP13	Student housing	A1	This policy will not itself lead to development because it relates to qualitative criteria for development
LAAP14	Town centre vitality and viability	A1	This policy will not itself lead to development because it relates to qualitative criteria for development
LAAP15	Lewisham market	A4	This policy supports the operations of Lewisham Market
LAAP16	Retail areas	A1	This policy will not itself lead to development because it relates to qualitative criteria for development
LAAP17	Evening economy	A1	This policy will not itself lead to development because it relates to qualitative criteria for development
LAAP18	Public realm	A3	This policy seeks to conserve or enhance the natural, built or historic environment
LAAP19	Tall buildings	A3	This policy seeks to conserve or enhance the natural, built or historic environment
LAAP20	Public/shopper parking spaces	A4	This policy seeks to ensure appropriate car parking facilities are provided
LAAP21	Encouraging cycling and walking	A2	This policy seeks to ensure cycling and walking routes are provided and enhanced
LAAP22	Social infrastructure	A4	This policy seeks to provide appropriate social infrastructure within the town centre



Policy number and name		Assessment category	Comment
LAAP23	Heritage assets	A3	This policy seek to preserve the historic environment
LAAP24	Carbon dioxide emission reduction	A3	This policy seeks to reduce carbon dioxide emissions arising from new development
LAAP25	Adapting to climate change	A1 A3	This policy will not itself lead to development because it relates to qualitative criteria for development
LAAP26	Monitoring	N/A	This policy relates to monitoring the AAP
LAAP27	Implementation	N/A	This policy states how the AAP will be implemented

### 3.2 Assessment outcomes

The assessment suggests that the proposed site allocations and policies contained in the two plans have been screened out and will have no negative effects upon the qualifying habitats and species or site sensitivities. Certain policies are not land use based policies, but are policies to address climate change, promote economic growth, improve design standards as well as promoting the consideration of environmental effects of development. Many of the site allocations and policies encourage environmental benefits such as the reduction of pollutants, focus development away from European Sites and includes protective designations which preserve and enhance local biodiversity.

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning decisions to be made in accordance with the development plan unless material considerations indicate otherwise. The development plan in Lewisham is the London Plan, the Lewisham Core Strategy (adopted 29 June 2011) and the saved policies in the Lewisham Unitary Development Plan (UDP) 2004. Material considerations include national planning policy statements and planning policy guidance. Policy 7.19 of the London Plan (2011) relates to biodiversity and access to nature and all planning decisions will need to be made in accordance with this policy. The policy states:

*Any proposals promoted or brought forward by the London Plan will not adversely affect the integrity of any European site of nature conservation importance (to include Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Ramsar, proposed and candidate sites) either alone or in combination with other plans and projects. Whilst all development proposals must address this policy, it is of particular importance when considering the following policies within the London Plan: 1.1, 2.1-2.17, 3.1, 3.3, 5.14, 5.15, 5.17, 5.20, 6.3, 7.14, 7.15, 7.25, and 7.29. Whilst all Opportunity and Intensification Areas must address the policy in general, specific locations requiring consideration are referenced in Annex 1.<sup>11</sup>*

<sup>11</sup> Annex 1 of the London Plan

### 3.3 Other plans and projects that may act in combination

In considering the likely significant effects of the SA DPD and the AAP on designated European sites, the cumulative impact of other plans and projects needs to be considered. When undertaking this part of the assessment it is essential to bear in mind the principal intention behind the legislation i.e. to ensure that those projects or plans which in themselves have minor impacts are not simply dismissed on that basis, but are evaluated for any cumulative contribution they may make to an overall significant effect. In practice, in combination assessment is therefore of greatest relevance when the plan would otherwise be screened out because its individual contribution is inconsequential.

It is neither practical nor necessary to assess the 'in combination' effects of the two plans within the context of all other plans and projects within London. The plans and projects of all other London boroughs (in particular, their LDFs) are relevant but in practise the London Plan, as the overriding Regional Spatial Strategy for London, encompasses their directions at a strategic level outlining additional housing, transportation and commercial/industrial allocations proposed. Other plans and projects considered to be of potential interest such as those of Transport for London and the London Development Agency are accommodated as part of the London Plan.

The key overriding provision in the London Plan (and reflected through the plans and programs of other London Local Planning Authorities) is the requirement that London will accommodate at least an annual average of 32,210 net additional homes or 322,100 over a ten year period (2011-2021) of which Lewisham must provide 1,105 annually or 11,050 over the ten year period.

Neighbouring boroughs DPDs considered as part of the in combination assessment are listed below.

- London Borough of Bexley – Core Strategy (Submission version May 2011)
- London Borough of Greenwich – Core Strategy (Pre-Submission version 2010)
- London Borough of Southwark – Core Strategy (Adopted 6 April 2011)
- London Borough of Tower Hamlets – Core Strategy (Adopted 15 September 2010)

Table 3.3: Potential 'in combination' and cumulative effects

Threat	Potential causes of likely significant effect	Comment
Recreational pressure	Increases in population and tourism resulting in increased public access to European Sites	An accessible, connected green infrastructure network throughout Lewisham and other SE London boroughs ensures the provision of local and regional open space recreational areas. The Lewisham Core Strategy seeks to maintain and improve this network as well as providing a network of high quality, connected and accessible walking routes across the borough. This includes improving the quality of existing open space and seeking new on-site provision of public and private open space as part of new

Threat	Potential causes of likely significant effect	Comment
		<p>development. These aspects of the Core Strategy are clearly reflected in the SA DPD and the AAP.</p> <p>The demand to travel to the identified European Sites, combined with their distance from the borough, is considered unlikely to result in a large number of visitors from either Lewisham or other SE London boroughs. The Lee Valley Park Development Framework provides detailed guidance as to how the area is to be managed, including the management of recreation and visitor numbers.</p>
Air pollution	Increased traffic	<p>Lewisham's Air Quality Management Plan outlines the main sources of air pollution and the measures to improve air quality. Emissions from vehicular traffic are not likely to be significant beyond 200m from a road. Therefore the impact of air pollution from traffic is not likely to impact the European Sites.</p> <p>The plans promote sustainable transport options, restrictive car parking provision and where appropriate support the implementation of the Air Quality Management Plan.</p>

## 4. Conclusion

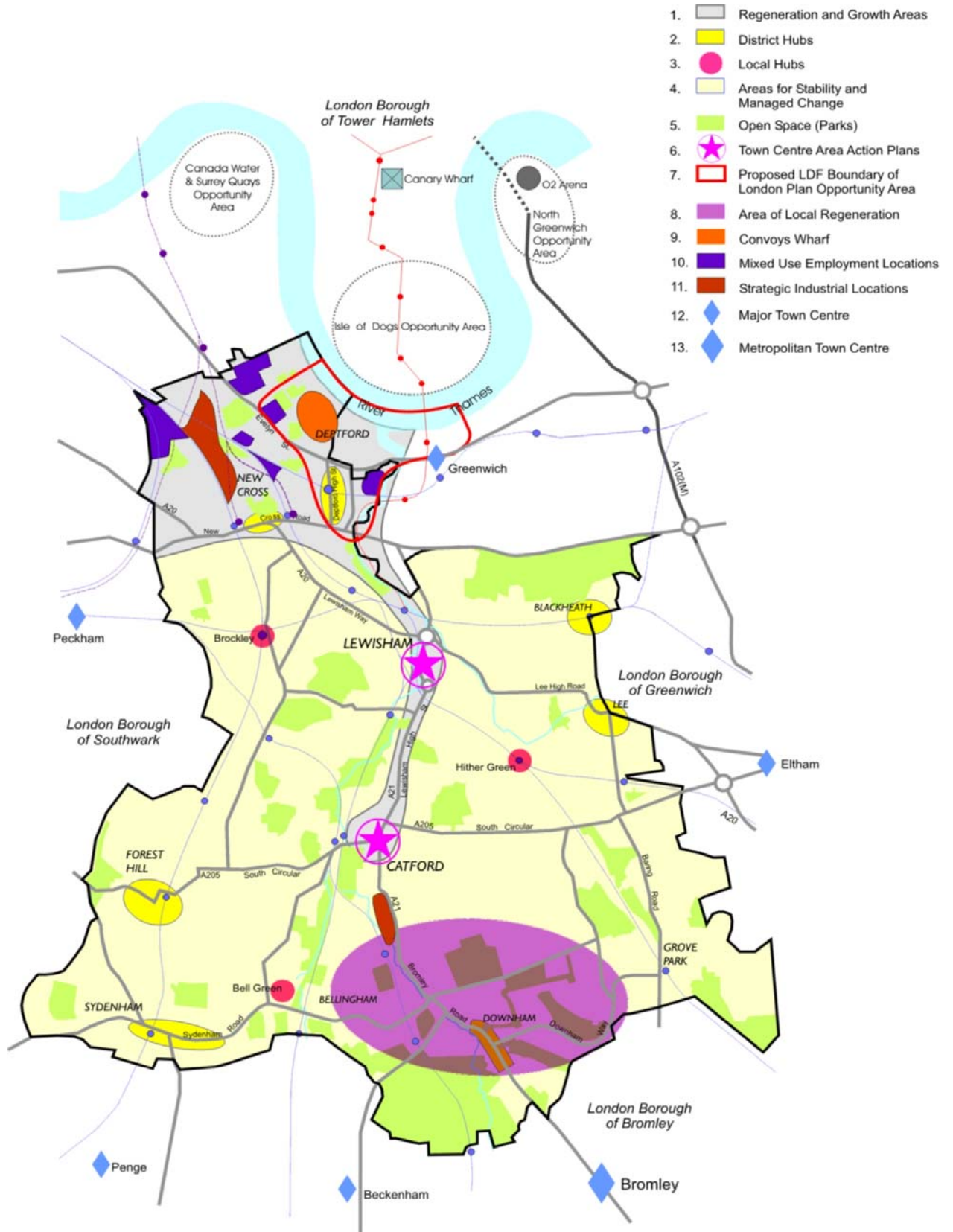
Screening of the emerging Site Allocations DPD and the Lewisham Town Centre AAP has been carried out in accordance with the requirements of the Habitats Directive and Regulations in order to ensure that the protection and integrity of the following European Sites is included as part of the both DPDs preparation process:

- Lee Valley SAC and Ramsar
- Richmond Park SAC
- Wimbledon Common SAC
- Epping Forest SAC

As detailed in both DPDs, the plans support the implementation of higher level plans namely the Lewisham Core Strategy and the London Plan. Since there are no European Sites within the borough and those identified for the screening are within 15km of the borough boundary, **the conclusion of this assessment is that no site allocation or policy has been found to have a likely significant effect on any designated European Site.**

In particular, the proposed site allocations and policies, on their own or in combination with any other relevant plans and projects, are unlikely to result in significant effect on the primary reasons for the designation of the European Sites and there is therefore no need to undertake task two and task three of the Habitats Regulations process.

# Appendix 1 Core Strategy spatial areas



Geographic Information & Research  
Regeneration Growth Scenario Dec 2009.cdr

**For translation, please provide your details below:**

**Për përkthim, ju lutemi shkruajini më poshtë detajet tuaja:**

**Pour la traduction, veuillez fournir les détails ci-dessous:**

**若需翻译, 请您提供下列详情:**

**Wixii ku saabsan turjumaad, fadlan hoos ku qor faahfaahintaada:**

**மொழிபெயர்ப்பிற்காக தயவுசெய்து உங்களைப் பற்றிய விபரங்களைக் கீழே அளியுங்கள்:**

**Tercüme edilmesi için, lütfen aşağıda detaylarınızı belirtin:**

**Để dịch thuật, xin hãy cung cấp các chi tiết của bạn phía dưới:**

**Name:**

**Emri:**

**Nom:**

**姓名:**

**Magaca:**

**பெயர்:**

**İsminiz:**

**Tên:**

**Address:**

**Adresa:**

**Adresse:**

**地址:**

**Cinwaanka:**

**முகவரி:**

**Adresiniz:**

**Địa chỉ:**

**Shqip/Albanian**

**Français/French**

**普通话/Mandarin**

**Soomaali/Somali**

**தமிழ்/Tamil**

**Türkçe/Turkish**

**Tiếng Việt/Vietnamese**

**Other language (please state)**

**Return to:**

**Kthejeni tek:**

**Retourner à:**

**返回到:**

**Kusoo dir:**

**திருப்பி அனுப்புவதற்கான முகவரி:**

**Şu adrese geri gönderiniz:**

**Gòri trà vè:**

Planning Policy  
London Borough of Lewisham  
5th Floor Laurence House  
Catford, SE6 4RU

---

For other formats, including Braille, large print, audio tape or computer disc contact:

Planning Policy 020 8314 7400

[planning.policy@lewisham.gov.uk](mailto:planning.policy@lewisham.gov.uk)