

9 January 2025

London Borough of Lewisham

Habitats Regulations Assessment of Lewisham Local Plan: Main Modifications

Dear Sir/Madam

AECOM was appointed by the London Borough of Lewisham to assist the Council in undertaking a Habitats Regulations Assessment of the Lewisham Local Plan to 2040. The HRA included a Test of Likely Significant Effects which considered the following potential pathways of impact: recreational pressure, water resources and pollution and air pollution. These were investigated with regard to the following European sites: Epping Forest SAC, Lee Valley SPA/Ramsar, Richmond Park SAC, Wimbledon Common SAC and Thames Estuary and Marshes SPA/Ramsar.

The report concluded there would be no Likely Significant Effect on any European sites, either alone or in combination with other plans or projects. This conclusion was based on the fact that the nearest European site is Epping Forest SAC, located 9.4km from London Borough of Lewisham, and all European sites lie outside the impact zones for the identified impact pathways as applied to London Borough of Lewisham. Appropriate Assessment (HRA stage 2) was therefore not required.

Following the Examination into the Local Plan, the Inspector has recommended a series of Main Modifications (MM) to be made to the Plan. It is therefore necessary for those modifications to be analysed in order to confirm that they will not themselves introduce new likely significant effects that were not thoroughly investigated for the HRA of the Local Plan. Reporting that analysis is the purpose of this letter.

Note therefore that this document should therefore be considered an Addendum to the HRA of the Local Plan. As such, it does not recap the methodology of the HRA or (in detail) the results of either the likely significant effects test of the Local Plan, including the 'in-combination' assessment. Instead it focuses specifically on whether the Main Modifications (MMs) will result in likely significant effects on any European sites.

Following the analysis of the proposed Main Modifications to the Local Plan it can be concluded that they will not lead to likely significant effects on European sites, alone or in combination with other plans and projects, and do not undermine the conclusions of the HRA of the Local Plan. This is because all relevant European sites continue to be outside the zone of influence of development set out in the Local Plan and will therefore not be affected by modifications to the Local Plan.

Yours sincerely,



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