

**MERTON COUNCIL  
FUTURE MERTON**

**Habitats Regulations Assessment on the Main Modifications to  
Merton's Sites and Policies Plan and Policies Map**

**(Part of Merton's local plan)**

**February 2014**

## **1 Introduction**

1.1 This Habitat Regulation Assessment (HRA) is for the Main Modifications to Merton's Sites and Policies Plan and Policies Map. This HRA should be read in conjunction with other HRA's for the Sites and Policies Plan undertaken since 2012. This HRA is only reviewing the effect of the Main Modifications and Amendments for the likely impact on the European sites.

1.2 In accordance with the Habitats Directive (92/43/EEC) Merton has to undertake screening exercises of the Site and Policies Plan and Policies Map. This assessment is independent of the Sustainability Appraisal although, its findings maybe noted in the report.

### **Background**

1.3 The EU directive on the Conservation of Natural Habitats and Wild Fauna and Flora, also referred to as the 'Habitats Directive', provides legal protection for habitats of exceptional European importance. Article two of this directive requires the restoration and maintenance of habitats and species to a favourable conservation status and subsequent articles set up the means to designate protection areas. These are either set up as Special Areas of Conservation (SAC) or Special Protection Areas (SPA) depending on the protection aim.

1.4 In order that these designated areas are protected the Habitats Directive has set the requirement for plans and projects to be assessed for their likely impact on them; in order to ensure that they do not have a negative impact. The assessment is to ensure that any significant effects are identified and avoided.

### **The Process**

- 1.5 The Conservation (Natural Habitats &c) Regulations 1994 have been amended to implement a judgement of the European Court of Justice. The amended Regulations came into force in 2007. The effect of the Regulations (as amended) is to add Part IVA (Regulations 85A -85E) under the title "Appropriate Assessments for Land Use Plans in England and Wales".
- 1.6 The essential requirement of this amendments is for the Local Planning Authority (LPA) to assess the potential effects of land use plans to ensure that the protection and integrity of European Sites is considered by the planning process at the local level. This is achieved by conducting a Habitats Regulations Assessment, to assess the impacts of a land-use plan against the conservation objectives of sites and to ascertain whether it would adversely affect the integrity of that site.
- 1.7 The European Sites network (also known as Natura 2000) provides for the protection of sites that are of exceptional importance for rare, endangered or vulnerable natural habitats and species within the European Community. These sites consist of Special Areas of Conservation (SACs), Special Protection Areas (SPAs) 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.
- 1.8 Article 6 (3) and (4) of the Directive states the requirement for assessment in order to determine whether the plan is '*likely to have a significant effect*' on European Sites. This is the screening stage of the process and determines whether further steps have to be taken. The Department of Communities and Local Government guidance states the following:
- "The comprehensiveness of the assessment work undertaken should be proportionate to the geographical scope of the option and the nature and extent of any effects identified. The assessment should be confined to the effects on the internationally important habitats and species for which the site is classified. An Appropriate Assessment need not be done in any more detail, or using more resources, than is useful for its purpose."*
- 1.9 If, following the screening, the plan is determined to have significant effects on any European Sites then the plan will have to undergo a full Appropriate Assessment where alternative measures are suggested. The alternative measures should prevent the plan from undermining the conservation objectives of the European Sites.
- 1.10 Merton's submission Sites and Policies Plan and Policies Map has been assessed in accordance with the criteria produced by Tydesley and Associates for Natural England entitled, '*The Habitats Regulations Assessment of Local Development Documents Revised Draft Guidance for Natural England – February 2009.*' The relevant sites have been identified and their features and impacts listed. Thereafter, the potential effects of each policy have been categorised according to the draft guidance. If any policies were considered to have likely significant effects, appropriate avoidance, cancellation or reduction measures would be considered.

## Appropriate Assessment: Key Tasks

1.11 We used the methodology given in the Draft Guidance 'The Habitats Regulations Assessment of Regional Spatial Strategies and Sub-Regional Strategies', David Tyldesley and Associates, for Natural England (March 2007). This is one of several guidance documents available, but it represents a standardised methodology that endorsed by Natural England.

1.12 The process involves the following steps:

**Figure 1: Habitats Regulation Assessment**

Habitats Regulation Assessment	
<b>Stage 1: Screening</b>	<ul style="list-style-type: none"> <li>• Identifying international site in and around the plan/strategy area</li> <li>• Examine conservation objectives (if available)</li> <li>• Analyse the policy/plan and its key components</li> <li>• Identify potential effects on European Sites</li> <li>• Examine other plans and programmes that could contribute to 'in combination' effects</li> <li>• <i>If no effects likely-report that no significant effect.</i></li> <li>• <i>If effects are judged likely or uncertainty exists- the precautionary principle applies proceed to <b>stage 2</b></i></li> </ul>
<b>Stage 2: Appropriate Assessment</b>	<ul style="list-style-type: none"> <li>• Collate information on sites and evaluate impact in light of conservation objectives</li> <li>• Consider how plan 'in combination' with other plans and programmes will interact when implemented (the Appropriate Assessment)</li> <li>• Consider how effect on integrity of site could be avoided by changes to plan and the consideration of alternatives</li> <li>• Develop mitigation measures (including timescale and mechanisms)</li> <li>• <i>Report outcomes of AA and develop monitoring strategies</i></li> <li>• <i>If effects remain following the consideration of alternatives and development of mitigations proceed to <b>stage 3</b></i></li> </ul>
<b>Stage 3: Assessment where no alternatives and adverse impacts remain</b>	<ul style="list-style-type: none"> <li>• Identify 'imperative reasons of overriding public interest' (IROPI)</li> <li>• Identify/ develop potential compensatory measures</li> <li>• Difficult test to pass, requirements are onerous and untested to date.</li> </ul>

- 1.13 Stages 1 and 2 are the stages reported on in this document. The whole process is referred to as the 'Habitats Regulations Assessment' with 'Appropriate Assessment' forming a stage within it. If, at the screening stage it is determined that the land-use plan will not adversely affect the integrity of any international site, alone or in combination with other plans and projects, the Appropriate Assessment stage of the process is not required, and it may proceed to publication.
- 1.14 As stated earlier in this report this assessment is only for the Main Modifications and Amendments for the Sites and Policies Plan and Policies Map under the Habitats Regulations. Previous, HRA's undertaken during the preparation of the Sites and Policies Plan, have influenced the development of policies and their effects.

**Figure 2: Habitat Regulation Screening Stages**

HRA Screening Stage	
<b>Task 1</b> Identification of European Sites and characterisation	<ul style="list-style-type: none"> <li>• Identification of European Sites both within Merton's boundary, within 15 km of the boundary and/or within the potential influence of the plan.</li> <li>• Information was obtained for each European Site, based on publicly available information and consultation with Natural England where appropriate.</li> <li>• This included information relating to the sites' qualifying features; conservation objectives (where available) vulnerabilities/ sensitivities and geographical boundaries.</li> </ul>
<b>Task 2</b> Strategy review, policy screening and identification of likely impacts	<ul style="list-style-type: none"> <li>• Screening of the policies and the identification of likely impacts (including a review of the strategy to determine likely impacts)</li> </ul>
<b>Task 3</b> Consideration of other plans and programmes	<ul style="list-style-type: none"> <li>• Consideration, where appropriate, of other plans and programmes that may have in combination effects</li> </ul>
<b>Task 4</b> Screening Assessment	<ul style="list-style-type: none"> <li>• Summary of screening outcomes and recommendations.</li> </ul>

### **The in-combination assessment**

- 1.15 The assessment of significant effects of a Main Modifications need to take into account its impact in-combination with other plans and projects, such as the National Planning Policy Framework (NPPF), London Plan (Spatial Development Strategy for Greater London) and those of adjacent local authorities.

### **Consultation**

- 1.16 The Habitats Regulations requires the plan making/competent authority to consult Natural England. The Habitats Regulations gives responsibility for consultation with other bodies and the public to the discretion of the plan making authority.
- 1.17 Where possible, guidance recommends that this consultation be undertaken alongside the consultation for the plan, A copy of this HRA will also be sent to the Environment Agency, Natural England and English Heritage for consideration and comment.

## **2 Identification of European Sites and characterisation**

- 2.1 The first steps was to identify the European Sites that may be affected by the land use plan and to acquire, examine and understand the conservation objectives of each interest feature of each site potentially affected. Natural England assisted in the identification of the relevant sites.
- 2.2 There are two sites, which are immediately relevant for Merton. One, Wimbledon Common, is within borough boundary, and the other is Richmond Park (Royal Park) which is approximately 3-4km away. It has been agreed with Natural England that a distance of 15km is a suitable catchment to identify Habitats Directive designated sites, as the effects of a plan can go beyond its boundary.
- 2.3 Beyond these two sites there are a number of sites outside London such as the Thames Basin Heaths, the Windsor Forest Great Park and the Mole Gap to Reigate Escarpment that are too distant to be considered relevant for this particular plan..
- 2.4 A part of the South West London Water bodies is just within the 15km catchment. The only possible impact that the Plan could have on these habitats would be through run-off but given that the river catchment areas for the borough do not drain into the South West London Water bodies, any run-off impact is unlikely to occur.

- 2.5 Therefore, the potential impacts of the Main Modifications for the Sites and Policies Plan will be screened with regard to the conservation objectives of Wimbledon Common and Richmond Park. The description and the reason for their designation are set out below *Wimbledon Common Special Area of Conservation*.
- 2.6 Much of Wimbledon Common is an SAC and SSSI. The common measures 348.31ha and is located 1.5km to the north west of Wimbledon town centre. The majority of the SAC is located within Merton and the smaller area of Putney Heath, within the London Borough of Wandsworth.
- 2.7 This SAC also borders the Royal Borough of Kingston upon Thames and consists of the following general habitat types:
- Inland water bodies (standing water, running water) (1%)
  - Bogs Marshes Water fringed vegetation. Fens (0.5%)
  - Heath Scrub Maquis and garrigue *Phygrana* (5%)
  - Dry grassland Steppes (45%)
  - Improved grassland (3.5%)
  - Broad-leaved deciduous woodland (45%)
- 2.8 Other key environmental assets of Wimbledon common:
- London Wildlife Trust managed Local Nature Reserve Fishpond Wood (managed
  - Largest area of wet heath in London, areas of dry heath and one of London's very few sphagnum bogs
  - High ground hosts an ancient tumulus, and an ancient monument, Caesar's Camp, can be seen near the Royal Wimbledon Golf Course.

2.9 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 the stag beetle, *Lucanus cervus*. The stag beetle is listed as an Annex II species in the Habitats Directive and is a primary reason for the designation of this site. Wimbledon Common also supports a number of other scarce invertebrate species associated with decaying timber.

2.10 The following Annex I habitats are present as a qualifying feature however, are not a primary reason for designation of this site.

- Northern Atlantic wet heaths with *Erica tetralix*
- European dry heaths

2.11 Richmond Park one of two National Nature Reserves in London and is a SAC measures 846.68ha, of which 0.3ha is within the Royal Borough of Kingston upon Thames. The park is to the west of Wimbledon Common with the Beverley Brook and the A3 separating the two, along with a cemetery and a golf course. Unlike Wimbledon Common, the Royal Park is closed every night at dusk. The park consists of the following general habitat types:

- Inland water bodies (standing water, running water) (1.5%)
- Bogs. Marshes. Water fringed vegetation. Fens (0.5%)
- Heath. Scrub. Maquis and garrigue. Phygrana (25%)
- Dry grassland. Steppes (18%)
- Humid grassland. Mesophile grassland (5%)
- Improved grassland (20%)
- Broad-leaved deciduous
- Mixed Woodland (5%)

2.12 Other key environmental feature:

- Adjacent golf courses and commons provide additional areas of acid grassland and secondary woodland
- Fallow and Red deer grazing in the park

- 2.13 As with Wimbledon Common, Richmond Park has a large number of ancient trees with decaying timber. It is at the heart of the south London centre of distribution for the stag beetle, *Lucanus cervus*. The stag beetle is listed as an Annex II species in the Habitats Directive and is a primary reason for the designation of this site.
- 2.14 Figures 3 and 4 set out the two sites' designations more explicitly; their current condition, uses of the sites and the impacts. Further details can be found in Appendices A and B.

### **European site descriptions**

- 2.15 Information for the sites including the rationale for their declaration as European Sites has been taken from the '*Appropriate Assessment for the London Plan*'. This also includes supplementary information to assist in the assessment of the significance of any impacts of policies on their nature conservation interest.

### **Potential impact on the European Sites**

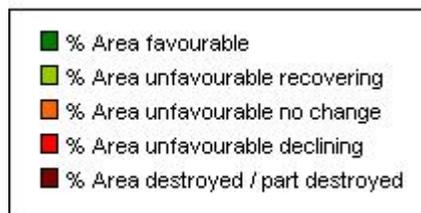
- 2.16 Both European Sites within Merton's catchment have been designated primarily due to the presence of Stag beetles and Wimbledon Common for some secondary habitat protection. The main impacts identified are related to the potential increased recreational use and the secondary impacts would be due to air pollution, increase in housing provision and transport use.
- 2.17 Stag Beetles are dependent on mature trees and deadwood and there is therefore, less concern that recreation will have an unduly detrimental impact on their habitat. The designated wet and dry heaths on Wimbledon Common could however, be affected by trampling from walkers or other recreational users. However, the management of the common and park, respectively by the Wimbledon Common and Putney Heath Conservators and the Royal Parks Authority, by for instance, dog control orders and other appropriate byelaws would be most relevant with regards to this potential impact.

**Figure 3: Wimbledon Common assessment (compiled January 2014)**

Main habitat	Unit area (ha)	Latest assessment date	Assessment description	Condition assessment comment
Acid grassland - lowland	129.31	11 Jun 2009	Unfavourable recovering	The heathland in this unit is currently not meeting the conservation objectives for the site. The age class diversity of <i>Calluna vulgaris</i> is poor, with little pioneer vegetation recorded compared to a high proportion of degenerate heather. There is a low diversity and frequency of desirable forbs across the heathland. The cover of <i>M.caerulea</i> within the dwarf shrub stands was within target, however <i>M.caerulea</i> was dominant in large areas between existing stands, limiting species diversity and encroaching into new areas. Whilst cover of tress and scrub within the remaining open heath is within target, the total cover across the unit needs to be reduced so that the extent of open heath is increased. The unit is covered by a HLS agreement that will improve the current resource and create new areas of heath. A timeframe for this work has been agreed in the heathland management plan. Therefore the unit has been recorded as unfavourable recovering condition.
Broadleaved, mixed and yew woodland - lowland	95.40	02 Mar 2009	Unfavourable recovering	The acid grassland in the unit was assessed in June 2008. It did not meet the target for sward composition: frequency of positive indicator species/taxa, with only 1 species recorded as frequent and 1 recorded as rare. The grassland passed all other targets. The grassland is in positive management under a HLS scheme so has been placed in recovering condition.
Dwarf shrub heath - lowland	17.62	20 Jul 2010	Unfavourable declining	

**Figure 4: Wimbledon Common condition summary (January 2014) - need to update with 2014 data.**

% Area meeting PSA target	% Area favourable	% Area unfavourable recovering	% Area unfavourable no change	% Area unfavourable declining	% Area destroyed / part destroyed
94.99%	0.00%	94.99%	0.00%	5.01%	0.00%



**Figure 5: Richmond Park assessment (Compiled: January 2014)**

Main habitat	Unit area (ha)	Latest assessment date	Assessment description	Condition assessment comment
Acid grassland - lowland	114.67	27 Oct 2010	Unfavourable recovering	The Royal Parks have developed a grassland management strategy which, when implemented, will result in an improvement in the condition of the areas of acid grassland in the park
Broadleaved, mixed	3.03	19 May 2010	Unfavourable	The unit was assessed as a component part of the wider lowland parkland and

Main habitat	Unit area (ha)	Latest assessment date	Assessment description	Condition assessment comment
and yew woodland - lowland			recovering	wood pasture habitat supporting invertebrate assemblages. As such the unit does not contain all features necessary to support the assemblage. The assessment of the habitat as a whole follows: SRS assessment: Average of 4.3 surfaces across the site. Average of 4 surfaces for the unit. Preferred surfaces for the site as a whole: Scrub: Less than 10% across the site. However there are a number of enclosures which have allowed the development of hawthorn and gorse scrub for example. Tree age structure: Across the site there are fewer saplings than veteran trees. There are greater than 25% of middle aged trees as there are veterans. The shortage of saplings is being addressed through a program of tree planting. Nectar sources: Less than 10% of the sward is able to flower across the site due to deer grazing. However, new enclosures in the open parkland and woodland management in closed woodland areas will result in ground flora development. Dead Wood, No. of veteran trees: A baseline of 1517 trees was established in a 2008 Royal Parks survey. Dead Wood, No of tree with attached dead wood: Most veteran trees observed had a significant amount of attached deadwood greater than 20cm diameter. Dead organic matter: This was variable across the site, in much of the parkland, cover was 5-10% Negative factors: Rhodendron cover in many of the enclosed woodlands. This is being addressed through a program of clearance. High bracken coverage increases fire risk. Bracken is being controlled through herbicide spraying and periodic rolling. Poor age structure of trees: This is being addressed through a tree planting program. The unit provides good levels of scrub, lying dead wood but has a closed canopy and is very shaded. Garden escapes and

Main habitat	Unit area (ha)	Latest assessment date	Assessment description	Condition assessment comment
				rhododendron are a problem.
Acid grassland - lowland	153.60	27 Oct 2010	Unfavourable recovering	The Royal Parks have developed a grassland management strategy which, when implemented, will result in an improvement in the condition of the areas of acid grassland in the park
Acid grassland - lowland	205.21	27 Oct 2010	Unfavourable recovering	The Royal Parks have developed a grassland management strategy which, when implemented, will result in an improvement in the condition of the areas of acid grassland in the park
Broadleaved, mixed and yew woodland - lowland	29.34	18 May 2010	Unfavourable recovering	The unit was assessed as a component part of the wider lowland parkland and wood pasture habitat supporting invertebrate assemblages. As such the unit does not contain all features necessary to support the assemblage. The assessment of the habitat as a whole follows: SRS assessment: Average of 4.3 surfaces across the site. Average of 4 surfaces for the unit. Preferred surfaces for the site as a whole: Scrub: Less than 10% across the site. However there are a number of enclosures which have allowed the development of hawthorn and gorse scrub for example. Tree age structure: Across the site there are fewer saplings than veteran trees. There are greater than 25% of middle aged trees as there are veterans. The shortage of saplings is being addressed through a program of tree planting. Nectar sources: Less than 10% of the sward is able to flower across the site due to deer grazing. However, new enclosures in the open parkland and woodland management in closed woodland areas will result in ground flora development. Dead Wood, No. of veteran trees: A baseline of 1517 trees was established in a 2008 Royal Parks survey. Dead Wood, No of tree with

Main habitat	Unit area (ha)	Latest assessment date	Assessment description	Condition assessment comment
				attached dead wood: Most veteran trees observed had a significant amount of attached deadwood greater than 20cm diameter. Dead organic matter: This was variable across the site, in much of the parkland, cover was 5-10% Negative factors: Rhododendron cover in many of the enclosed woodlands. This is being addressed through a program of clearance. High bracken coverage increases fire risk. Bracken is being controlled through herbicide spraying and periodic rolling. Poor age structure of trees: This is being addressed through a tree planting program. The unit provides nectar sources: bramble, rhododendron and has a high proportion of young oak and birch trees but few saplings
Broadleaved, mixed and yew woodland - lowland	4.66	19 May 2010	Unfavourable recovering	The unit was assessed as a component part of the wider lowland parkland and wood pasture habitat supporting invertebrate assemblages. As such the unit does not contain all features necessary to support the assemblage. The assessment of the habitat as a whole follows: SRS assessment: Average of 4.3 surfaces across the site. Average of 4 surfaces for the unit. Preferred surfaces for the site as a whole: Scrub: Less than 10% across the site. However there are a number of enclosures which have allowed the development of hawthorn and gorse scrub for example. Tree age structure: Across the site there are fewer saplings than veteran trees. There are greater than 25% of middle aged trees as there are veterans. The shortage of saplings is being addressed through a program of tree planting. Nectar sources: Less than 10% of the sward is able to flower across the site due to deer grazing. However, new enclosures in the open parkland and woodland

Main habitat	Unit area (ha)	Latest assessment date	Assessment description	Condition assessment comment
				management in closed woodland areas will result in ground flora development. Dead Wood, No. of veteran trees: A baseline of 1517 trees was established in a 2008 Royal Parks survey. Dead Wood, No of tree with attached dead wood: Most veteran trees observed had a significant amount of attached deadwood greater than 20cm diameter. Dead organic matter: This was variable across the site, in much of the parkland, cover was 5-10% Negative factors: Rhodendron cover in many of the enclosed woodlands. This is being addressed through a program of clearance. High bracken coverage increases fire risk. Bracken is being controlled through herbicide spraying and periodic rolling. Poor age structure of trees: This is being addressed through a tree planting program. The unit provides good levels of scrub and has a good age structure. Overall volume of fallen timber is high
Broadleaved, mixed and yew woodland - lowland	7.86	19 May 2010	Unfavourable recovering	The unit was assessed as a component part of the wider lowland parkland and wood pasture habitat supporting invertebrate assemblages. As such the unit does not contain all features necessary to support the assemblage. The assessment of the habitat as a whole follows: SRS assessment: Average of 4.3 surfaces across the site. Average of 4 surfaces for the unit. Preferred surfaces for the site as a whole: Scrub: Less than 10% across the site. However there are a number of enclosures which have allowed the development of hawthorn and gorse scrub for example. Tree age structure: Across the site there are fewer saplings than veteran trees. There are greater than 25% of middle aged trees as there are veterans. The shortage of saplings is being addressed through a program of tree planting. Nectar

Main habitat	Unit area (ha)	Latest assessment date	Assessment description	Condition assessment comment
				sources: Less than 10% of the sward is able to flower across the site due to deer grazing. However, new enclosures in the open parkland and woodland management in closed woodland areas will result in ground flora development. Dead Wood, No. of veteran trees: A baseline of 1517 trees was established in a 2008 Royal Parks survey. Dead Wood, No of tree with attached dead wood: Most veteran trees observed had a significant amount of attached deadwood greater than 20cm diameter. Dead organic matter: This was variable across the site, in much of the parkland, cover was 5-10% Negative factors: Rhododendron cover in many of the enclosed woodlands. This is being addressed through a program of clearance. High bracken coverage increases fire risk. Bracken is being controlled through herbicide spraying and periodic rolling. Poor age structure of trees: This is being addressed through a tree planting program. The unit provides good levels of scrub, young and middle aged trees. Ground flora provides good nectar sources. Rhododendron is a problem in this unit.
Acid grassland - lowland	205.12	27 Oct 2010	Unfavourable recovering	The Royal Parks have developed a grassland management strategy which, when implemented, will result in an improvement in the condition of the areas of acid grassland in the park
Broadleaved, mixed and yew woodland - lowland	5.82	19 May 2010	Unfavourable recovering	The unit was assessed as a component part of the wider lowland parkland and wood pasture habitat supporting invertebrate assemblages. As such the unit does not contain all features necessary to support the assemblage. The assessment of the habitat as a whole follows: SRS assessment: Average of 4.3 surfaces across the site. Average of 4 surfaces for the unit. Preferred

Main habitat	Unit area (ha)	Latest assessment date	Assessment description	Condition assessment comment
				<p>surfaces for the site as a whole: Scrub: Less than 10% across the site. However there are a number of enclosures which have allowed the development of hawthorn and gorse scrub for example. Tree age structure: Across the site there are fewer saplings than veteran trees. There are greater than 25% of middle aged trees as there are veterans. The shortage of saplings is being addressed through a program of tree planting. Nectar sources: Less than 10% of the sward is able to flower across the site due to deer grazing. However, new enclosures in the open parkland and woodland management in closed woodland areas will result in ground flora development. Dead Wood, No. of veteran trees: A baseline of 1517 trees was established in a 2008 Royal Parks survey. Dead Wood, No of tree with attached dead wood: Most veteran trees observed had a significant amount of attached deadwood greater than 20cm diameter. Dead organic matter: This was variable across the site, in much of the parkland, cover was 5-10% Negative factors: Rhodendron cover in many of the enclosed woodlands. This is being addressed through a program of clearance. High bracken coverage increases fire risk. Bracken is being controlled through herbicide spraying and periodic rolling. Poor age structure of trees: This is being addressed through a tree planting program. The unit provides good levels of scrub, young and middle aged trees. Ground flora provides good nectar sources. Little dead wood evident, however abundant dead wood attached to trees.</p>
Broadleaved, mixed and yew woodland	22.52	19 May 2010	Unfavourable recovering	The unit was assessed as a component part of the wider lowland parkland and wood pasture habitat supporting invertebrate assemblages. As such the unit

Main habitat	Unit area (ha)	Latest assessment date	Assessment description	Condition assessment comment
- lowland				<p>does not contain all features necessary to support the assemblage. The assessment of the habitat as a whole follows: SRS assessment: Average of 4.3 surfaces across the site. Average of 4 surfaces for the unit. Preferred surfaces for the site as a whole: Scrub: Less than 10% across the site. However there are a number of enclosures which have allowed the development of hawthorn and gorse scrub for example. Tree age structure: Across the site there are fewer saplings than veteran trees. There are greater than 25% of middle aged trees as there are veterans. The shortage of saplings is being addressed through a program of tree planting. Nectar sources: Less than 10% of the sward is able to flower across the site due to deer grazing. However, new enclosures in the open parkland and woodland management in closed woodland areas will result in ground flora development. Dead Wood, No. of veteran trees: A baseline of 1517 trees was established in a 2008 Royal Parks survey. Dead Wood, No of tree with attached dead wood: Most veteran trees observed had a significant amount of attached deadwood greater than 20cm diameter. Dead organic matter: This was variable across the site, in much of the parkland, cover was 5-10% Negative factors: Rhodendron cover in many of the enclosed woodlands. This is being addressed through a program of clearance. High bracken coverage increases fire risk. Bracken is being controlled through herbicide spraying and periodic rolling. Poor age structure of trees: This is being addressed through a tree planting program. The unit provides good nectar sources through planted shrubberies. There are many planted saplings and middle aged trees but few old/veteran trees. Dead wood resource was scarce</p>

Main habitat	Unit area (ha)	Latest assessment date	Assessment description	Condition assessment comment
Acid grassland - lowland	57.27	27 Oct 2010	Unfavourable recovering	The Royal Parks have developed a grassland management strategy which, when implemented, will result in an improvement in the condition of the areas of acid grassland in the park
Broadleaved, mixed and yew woodland - lowland	18.75	19 May 2010	Unfavourable recovering	The unit was assessed as a component part of the wider lowland parkland and wood pasture habitat supporting invertebrate assemblages. As such the unit does not contain all features necessary to support the assemblage. The assessment of the habitat as a whole follows: SRS assessment: Average of 4.3 surfaces across the site. Average of 4 surfaces for the unit. Preferred surfaces for the site as a whole: Scrub: Less than 10% across the site. However there are a number of enclosures which have allowed the development of hawthorn and gorse scrub for example. Tree age structure: Across the site there are fewer saplings than veteran trees. There are greater than 25% of middle aged trees as there are veterans. The shortage of saplings is being addressed through a program of tree planting. Nectar sources: Less than 10% of the sward is able to flower across the site due to deer grazing. However, new enclosures in the open parkland and woodland management in closed woodland areas will result in ground flora development. Dead Wood, No. of veteran trees: A baseline of 1517 trees was established in a 2008 Royal Parks survey. Dead Wood, No of tree with attached dead wood: Most veteran trees observed had a significant amount of attached deadwood greater than 20cm diameter. Dead organic matter: This was variable across the site, in much of the parkland, cover was 5-10% Negative factors: Rhodendron cover in many of the enclosed woodlands. This

Main habitat	Unit area (ha)	Latest assessment date	Assessment description	Condition assessment comment
				is being addressed through a program of clearance. High bracken coverage increases fire risk. Bracken is being controlled through herbicide spraying and periodic rolling. Poor age structure of trees: This is being addressed through a tree planting program. The unit provides good dead wood resource - lying fallen timber, stumps and loggeries. There is a poor scrub layer and few saplings/young trees. Nectar sources are in short supply. Rhododendron is present but not widespread.
Broadleaved, mixed and yew woodland - lowland	18.76	19 May 2010	Unfavourable recovering	The unit was assessed as a component part of the wider lowland parkland and wood pasture habitat supporting invertebrate assemblages. As such the unit does not contain all features necessary to support the assemblage. The assessment of the habitat as a whole follows: SRS assessment: Average of 4.3 surfaces across the site. Average of 4 surfaces for the unit. Preferred surfaces for the site as a whole: Scrub: Less than 10% across the site. However there are a number of enclosures which have allowed the development of hawthorn and gorse scrub for example. Tree age structure: Across the site there are fewer saplings than veteran trees. There are greater than 25% of middle aged trees as there are veterans. The shortage of saplings is being addressed through a program of tree planting. Nectar sources: Less than 10% of the sward is able to flower across the site due to deer grazing. However, new enclosures in the open parkland and woodland management in closed woodland areas will result in ground flora development. Dead Wood, No. of veteran trees: A baseline of 1517 trees was established in a 2008 Royal Parks survey. Dead Wood, No of tree with

Main habitat	Unit area (ha)	Latest assessment date	Assessment description	Condition assessment comment
				attached dead wood: Most veteran trees observed had a significant amount of attached deadwood greater than 20cm diameter. Dead organic matter: This was variable across the site, in much of the parkland, cover was 5-10% Negative factors: Rhodendron cover in many of the enclosed woodlands. This is being addressed through a program of clearance. High bracken coverage increases fire risk. Bracken is being controlled through herbicide spraying and periodic rolling. Poor age structure of trees: This is being addressed through a tree planting program. The unit provides good dead wood resource - a high proportion of trees have signs of decay/hollowing and the quantity of fallen timber is good. Many of the logs are in open and dappled conditions. Scrub resource is poor.

**Figure 6:** Richmond Park condition summary (compiled January 2014)

% Area meeting PSA target	% Area favourable	% Area unfavourable recovering	% Area unfavourable no change	% Area unfavourable declining	% Area destroyed / part destroyed
100.00%	0.00%	100.00%	0.00%	0.00%	0.00%

- % Area favourable
- % Area unfavourable recovering
- % Area unfavourable no change
- % Area unfavourable declining
- % Area destroyed / part destroyed



2.18 Figure 3 and 5 contains details of the known sensitivities / vulnerabilities of the European Sites. The following sections summarise the effects which could be relevant to the Main Modifications and Amendments for the Sites and Policies Plan and Policies Map. A review of has been undertaken and any possible effects have been identified are discussed further in section 3.

### **3 Strategy review, policy screening and identification of likely impacts (Task 2) Consideration of other plans and programmes (Task 3)**

3.1 The HRA requirement of Task 2 and Task 3 have been assessed for Merton's Submitted Sites and Policies Plan (document reference SP4.10). This HRA focuses on the Main Modifications to the Plan, which are screened below. The nature of these main modifications, particularly that most modifications to the Plan do not lead to development, means that they don't have an impact in isolation or in combination with other Plans on the identified European sites.

### **4 Screening Assessment (Task 4)**

4.1 In line with the screening requirements of the Habitats Regulations, an assessment was undertaken to determine the potential significant effects of potential sites on the integrity of the European Sites that lie within the potential influence of the plan.

#### **Screening Methodology**

4.2 This section of the report covers the screening assessment of the Main Modification and minor amendments to the Plan. These have been analysed to assess whether these proposed changes to the planning document would be likely to result in significant adverse impacts on European Sites within the Merton catchment area as identified in section 4. It is unlikely that any of the Main Modifications and amendments would have an adverse impact the European Sites based on the criteria set out in section 5 of the revised draft Natural England guidance prepared by Tyldesley and Associates 2009.

4.3 This assumption is formed by considering how the proposed Main Modifications and amendments would result individually or in combination to create development, compared to the submitted Plan. The HRA for the submitted Plan found no adverse effects on European sites.

4.4 The HRA for the submitted Plan identified the European Sites (section 3) and used the catchment area (15km), which helps us to understand how land use and development may affect land that is outside the plans boundary. Furthermore, looking outside

the HRA boundary area (the borough boundary and the 15km catchment area) that may be affected, in the case of Merton this would be the neighbouring boroughs.

- 4.5 In addition, if we look at areas outside the HRA boundary that maybe affected, for example, through related infrastructure for example water supply reservoirs or treatment works of other waste stream infrastructure that received waste or discharge from the plan area.
- 4.6 It is considered that such development in conjunction with '**sound evidence**' namely The South London Waste plan, the HRA carried out on the Waste Plan and the London Plan; is unlikely to adverse impact to the European Sites. Also, considered was the Thames Basin Heaths, the Windsor Forest Great Park and the Mole Gap to Reigate Escarpment however, due to the location these sites are too distant to be considered relevant. The guidance also advises that where uncertainty is encountered a precautionary approach should be adopted with worst outcomes assumed.

**Figure 10:** Screening of the Main Modifications

Modification Reference	Policy/ Site	Proposed Modifications	Comment
MM1	DM R1: Location and scale of development in Merton's town centres and neighbourhood parades	Additional policy wording to part iii for clarity relating to Wimbledon Village	<b>A3:</b> Option/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 European Sites.
MM2	DM R1: Location and scale of development in Merton's town centres and neighbourhood parades	Removal of references to Wimbledon Village.	<b>A1:</b> Option/policies that will not themselves lead to development.
MM3	DM R1: paragraph 1.11	Additional justification wording providing consistency and justification to MM1	<b>A1:</b> Option/policies that will not themselves lead to development.
MM4	DM R1: paragraph 1.12	Additional justification wording for clarity relating to MM1.	<b>A1:</b> Option/policies that will not themselves lead to development.
MM5	Paragraph 2.11	Position statement – meeting government guidance on the accommodation needs of gypsies, travellers and travelling showpeople.	<b>A1:</b> Option/policies that will not themselves lead to development.
MM6	DM F1: Support for flood risk management: policy aim.	Additional wording to the policy aim.	<b>A3:</b> Option/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 European Sites.
MM7	DM F1 Support for flood risk management	Additional wording to provide clarity and conformity to the NPPF.	<b>A1:</b> Option/policies that will not themselves lead to development.
MM8	DM H3: Support for affordable housing	Removal of paragraph	<b>A1:</b> Option/policies that will not themselves lead to development.

Modification Reference	Policy/ Site	Proposed Modifications	Comment
	paragraph 2.42		
MM9	DM H5: Student housing, other housing with shared facilities and bedsits: paragraph 3.22	Removal of paragraph	<b>A1:</b> Option/policies that will not themselves lead to development.
MM10	Site 16 Wimbledon Library / Marlborough Hall	Removal of site allocation from the plan.	<b>A1:</b> Option/policies that will not themselves lead to development.
MM11	Site 37 Wimbledon Greyhound Stadium	To text setting out the council's expectation on public consultation of this site allocation.	<b>A1:</b> Option/policies that will not themselves lead to development.

### Screening Assessments conclusions

- 4.7 It is clear from the assessment that there are no negative impacts on European Sites either through either the Main Modifications or the Amendments for the Sites and Policies Plan. .

### 5 Conclusion

- 5.1 The findings of the first stage of the screening assessment concluded that in isolation, the Main Modifications will not have any negative impacts upon the identified European Sites.
- 5.2 The second stage of the screening assessment concluded that *'in combination'* with other plans and programmes there would be no likely significant effects on a European Site. The screening assessment demonstrates that there is no further need to conduct more detailed studies into the impacts of the Main Modifications for the Sites and Policies Plan would not be necessary.
- 5.3 These findings are in conformity with the Habitats Regulation Assessment carried out on the Stage 2 (January 2012), stage 2a (June 2012), stage 3 (January 2013) and stage 4 (July 2013).

**Appendix 1: Categorisation of the potential effect of the policies on the European Sites**

Category A: No negative effect	
A1	Policies that will not themselves lead to development e.g. because they relate to design or other qualitative criteria for development, or they are not a land use planning policy.
A2	Policies intended to protect the natural environment, including biodiversity.
A3	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 Sites.
A4	Policies that positively steer development away from European Sites and associated sensitive areas.
A5	Policies that would 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.
Category B: No significant effect	
B	Effects are trivial or 'de minimis', even if combined with other effects.
Category C: Likely significant effect alone	
C1	The option, policy or proposal could directly affect a European Sites because it provides for, or steers, a quantity or type of development onto a European Site, or adjacent to it.
C2	The option, policy or proposal could indirectly affect a European Site e.g. because it provides for, or steers, a quantity or type of development that may be very close to it, or ecologically, hydrologically or physically connected to it or it may increase disturbance as a result of increased recreational pressures
C3	Proposals for a magnitude of development that, no matter where it was located, the development would be likely to have a significant effect on a European Site

**Appendix 2: Site of Special Scientific Interest (SSSI) glossary can be found in Merton's Sites and Policies Plan submitted Habitats Regulations Assessment (document SP4.10)**