

Habitats Regulations Assessment Screening Report for the Ealing 2026 Development Strategy

Screening Report Prepared by Ealing Council

September 2010



Shoveler, South West London Waterbodies

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1. Non-technical Summary

Habitats Regulations Assessment (HRA) is a requirement under Directive 92/43/EEC (“Habitats Directive”) on the Conservation of Natural Habitats and of Wild Fauna and Flora, and the Conservation (Habitats, &c) Regulations 1994. The purpose of HRA is to assess the impacts of a plan (or project) against the conservation objectives of a European designated site for any likely significant effects, and to ascertain whether the proposed plan would adversely affect the integrity of the site.

This report presents the findings of a screening exercise undertaken to establish whether the 2026 Development Strategy requires a full Appropriate Assessment (AA). This Development Plan Document will guide development in the Borough up to 2026, and sets the context for the rest of Ealing’s Local Development Framework.

Screening is the first stage of the HRA process, and requires an examination of the likely effects of the document upon a European Site and consideration as to whether it can be objectively concluded that these effects will not be significant. If, following screening, significant adverse impacts are anticipated, a ‘full’ Appropriate Assessment considers the potential for impacts in more detail and whether alternative measures can be adopted.

There are no European Sites that fall within the Ealing Borough boundary. However, recognising that the plans being prepared by the Council may influence European sites in neighbouring boroughs, sites were scoped into the study if they occurred either wholly or partly within 10km of the borough boundary. The following sites have been considered:

- South West London Waterbodies (Ramsar site / Special Protection Area)
- Richmond Park (Special Area for Conservation)
- Wimbledon Common (Special Area for Conservation)

An Appropriate Assessment Screening Matrix was used to examine the relationship between the Strategy and the conservation objectives of the European Sites. The assessment has concluded that **there would be no likely significant effects**.

The Council has produced this report to accompany publication of the draft Submission Development Strategy for consultation. A separate Sustainability Appraisal (incorporating Strategic Environmental Assessment) has also been undertaken. The Sustainability

Appraisal Report is presented as a separate document and can be viewed online at http://www.ealing.gov.uk/services/environment/planning/planning_policy/local_development_framework/consultation/

If you require further information, have any questions, or require additional copies of published materials, please contact the Planning Policy team on 020 8825 7950 or email planpol@ealing.gov.uk

How to Comment on this Report

Comments are invited on the Screening Report and other Local Development Framework Documents currently being consulted upon. Any comments should be sent to:

Planning Policy
Ealing Council
14-16 Uxbridge Road
London W5 2HL

Alternatively, comments can be e-mailed to: planpol@ealing.gov.uk

Please note that responses to this document should be received no later than **5^h November 2010**. Responses to the Screening Report will be made public and a summary of the consultation findings will be made available on the Council's website.

2. Requirement to Undertake a Habitats Regulations Assessment

The requirement to carry out Habitats Regulations Assessment of plans or projects is set out 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 (“Habitats Directive”) and the Conservation (Habitats, &c) Regulations 1994 (“the regulations”). The regulations are responsible for safeguarding designated conservation sites, which protect the habitats and species listed in the annexes of these directives. Designated sites include Special Protection Areas (SPAs), Special Areas for Conservation (SACs), and international RAMSAR sites (herein referred to as ‘European Sites’).

Article 6(3) of the Habitats Directive 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” 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.”

The regulations state that a 'plan making authority ... shall, before the plan is given effect, make an appropriate assessment of the implications for the site in view of the site's conservation objectives'. This is required where a land use plan:

*'a) is likely to have a significant effect 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 October 2005, the European Court of Justice ruled that the UK had failed to ensure that land use plans are subject to AA. Subsequently, in September 2006 the regulations were amended to require all Regional Spatial Strategies, Development Plan Documents (DPD's) and Supplementary Planning Documents (SPD's) likely to have a significant effect on a European Site, to be subject to an AA (refer to Schedule 1 of the Conservation (Natural Habitats, &c) (Amendment) (England and Wales) Regulations 2006 (Habitats Regulations), which inserts a new Part IVA into the Conservation (Habitats, &c) Regulations 1994). To meet the requirements of the Directive, the local planning authority must carry out the HRA in the preparation of the emerging plans that will form part of the Local Development Framework for Ealing, with the intention of avoiding conflicts between the development proposals contained within the plans and EU conservation objectives.

3. Methodology

The HRA process comprises 3 stages:

Stage 1: Screening for likely significant effects

Stage 2: Appropriate Assessment and ascertaining the effect on site integrity

Stage 3: Mitigation and alternative solutions (and, in exceptional circumstances, imperative reasons of overriding public interest)

This report presents the findings of the screening exercise (Stage 1) undertaken to determine whether the 2026 Development Strategy, which is being produced as part of Ealing's Local Development Framework, requires a full Appropriate Assessment. The screening process examines the likely effects of the plan or project upon a European site and considers whether any effects will be significant. European Commission guidance (2001) recommends that this stage should encompass four steps:

1. Determining whether the project or plan is directly connected with or necessary to the management of the site;
2. Describing the project or plan and the description and characterisation of other projects or plans that in combination have the potential for having significant effects on the European site;
3. Identifying the potential effects on the European site;
4. Assessing the significance of any effects on the European site

If, following screening, significant adverse impacts on a European Site are anticipated, a 'full' Appropriate Assessment (where effects in combination with other plans and projects in the region are identified and analysed) considers 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'.

The precautionary principle must be applied in making determinations regarding the significance of effects. This means that where information is not available, or where there is doubt and further research is required, the local authority should proceed with the AA process.

'In combination' effects

Unless the plan and existing trends have only a 'de minimis' impact on site integrity, the 'in combination' test must be undertaken. This involves assessing the impacts arising from the combination of the relevant plan components, existing trends, and other plans and projects on the integrity of the relevant European Sites. This recognises that, even where a plan may not in itself have a significant impact on a European Site, the effects of the plan in combination with existing trends and other plans and projects could be significant. In combination effects are addressed in the following screening and analysis.

Assessment matrix and thematic analysis

The Screening methodology is based on guidance set out by the European Commission (2001). This has been used to examine the relationship between the DPD and the conservation objectives of the European Sites. This screening exercise also adopts elements of the guidance prepared by Tyldesley and Associates (2006) for Natural England and applied to the Appropriate Assessment of the Draft Further Alterations to the London Plan. Seven criteria denote when policies can be considered as having 'no' effect on European Sites, and two criteria denote where policies are more likely to have a significant effect (for the complete list of criteria see Table 2 'Excerpt from Section 5: Coding used for recording effects / impacts on European Sites (from Tyldesley and Associates, 2006, Annex 2)'. Although developed for use in the preparation of Regional Spatial Strategies, it is considered that this methodology can also be applied to the analysis of both DPD's and SPD's.

4. Screening for Likely Significant Effects

The following assessment considers the four stage screening process set out in the methodology, and investigates whether the Development Strategy is likely to have a significant adverse impact on the European Sites.

Brief description of project or plan

The Development Strategy will set out Ealing Council's over arching vision and proposals for the future development of the Borough over the next 15 years until 2026, and provides a spatial policy framework for all other Local Development Document's. The proposals set out how, where and when the Council, working with statutory bodies, the private sector and voluntary sector, will:

- Provide new housing for the Borough's growing population;
- Sustain and create jobs;
- Protect and enhance green and open space and the borough's heritage; and,
- Ensure that community facilities, services and transport infrastructure are provided where and when needed.

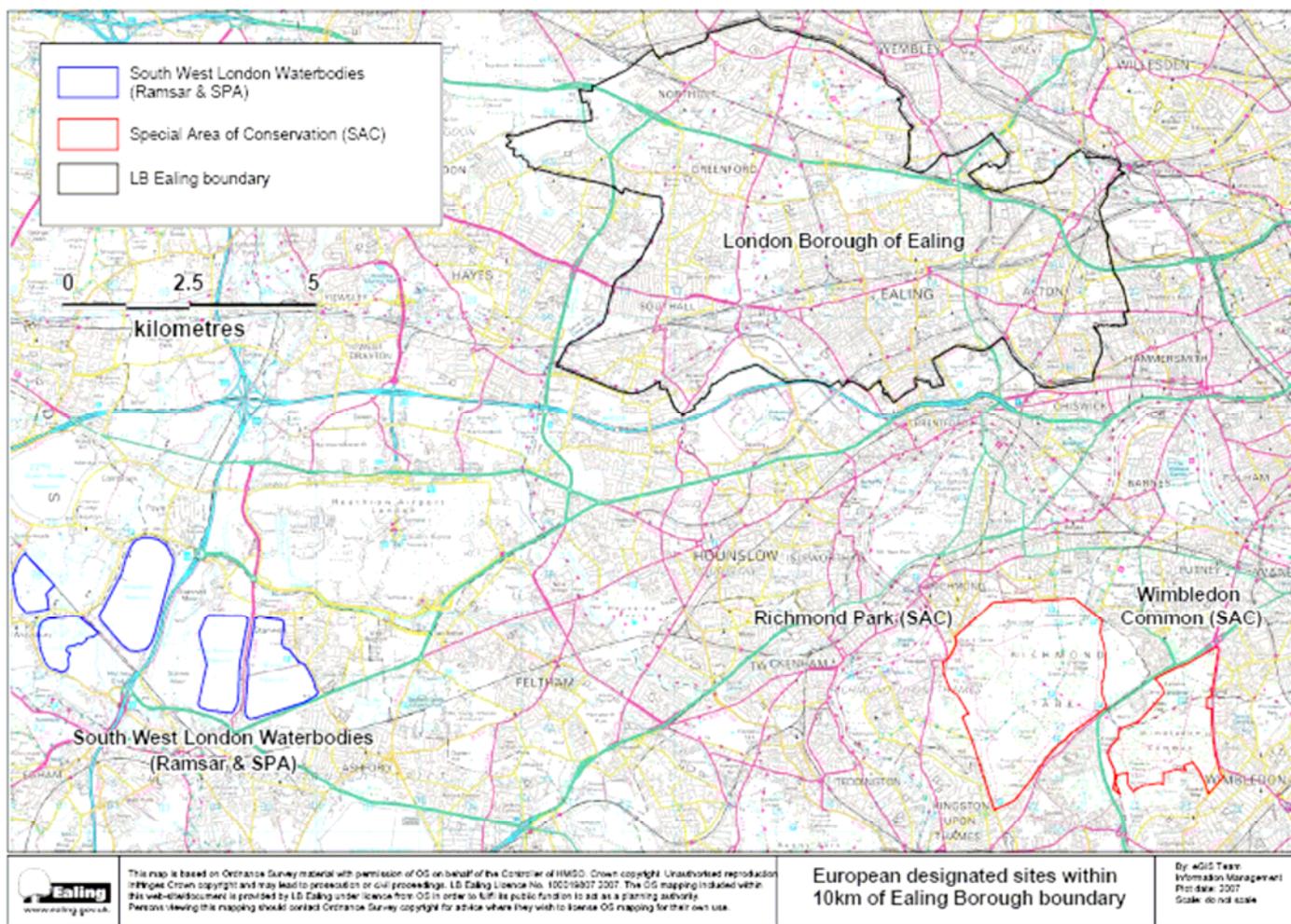
When approved it will become a statutory Local Development Document forming part of the Local Development Framework for Ealing. The Strategy is developed within the regional planning framework set out by the London Plan.

Identification of sites

The geographical scope was defined alongside consultation with Natural England, and extended a minimum of 10km from the borough boundary. There are no European sites situated within the London Borough of Ealing. However, recognising that the plans being prepared by the Council may influence sites in neighbouring boroughs, sites were scoped into the study if they occurred either wholly or partly within 10km of the borough boundary. The following sites were considered:

- South West London Waterbodies (Ramsar site / Special Protection Area)
- Richmond Park (Special Area for Conservation)
- Wimbledon Common (Special Area for Conservation)

Map 1: European Designated Sites within 10km of Ealing Borough Boundary



Possible impacts of the Ealing Development Strategy

With reference to the table above and the themes within the Development Strategy, several possible impacts of development on identified European Sites can be identified:

- Increased urbanisation generally which could entail greater noise, light, and air pollution. This could impact on migrating birds. Greater urbanisation could also degrade water quality.
- Increased water use, which, depending on where the water comes from (or goes to), could affect water levels and quality within European Sites.
- Increased traffic from housing and commercial development, leading to increased air pollution, which could affect sensitive species.
- Population growth leading to increased visits to European Sites with associated disturbance to flora & fauna and impacts on supporting habitats due to recreational activities.

Long-term trends and in-combination effects

The London Plan Sustainability Appraisal report identifies a number of key trends in the London region, which are likely to have detrimental environmental impacts. Trends relating to climate change are also likely to have significant impacts for biodiversity, which could affect the integrity of European Sites:

London trends

- Rising water consumption and a predicted water deficit in periods of drought
- Higher susceptibility to flooding
- Increase in impermeable surfaces and subsequent runoff could lead to greater water pollution. Periods of flooding will threaten water quality further
- London's air pollution is the worst in the UK and amongst the worst in Europe
- It is estimated that targets on NO₂ levels will not be achieved
- Waste production to increase

- The number of goods vehicles (which are the worst polluting vehicles) is set to increase
- Housing growth will place greater recreational pressure on London's open spaces and could have a detrimental impact on biodiversity.

Table 1 sets out the assessment of possible impacts and their level of significance, arising from the implementation of the Core Strategy.

Table 1: Screening for Likely Significant Effects

Elements of the following table were adapted from Section 4 of the *Appropriate Assessment Screening Report: 'Draft Further Alterations to the London Plan'*, prepared for the Greater London Authority by Forum for the Future (September 2006). The contents of the table were also informed by consultation with English Nature. Baseline information including the sites' qualifying interest features and characteristics, conservation objectives and the current site condition are listed in the Addendum to the Table.

Site Name, Designation and Code	Qualifying Features		Current Condition and threats	Result of July 2006 SSSI Survey	Key Ecosystem Factors	Possible impacts arising from the Development Strategy	Is there a risk of a significant effect? (Magnitude/ duration/ reversibility /impact)	Possible impacts from other trends, plans and projects.	Is there a risk of significant 'in combination' effect?
	Habitat	Species							
<p>South West London Waterbodies</p> <p>Ramsar UK11065</p> <p>SPA UK 9012171</p>	To maintain, in favourable conditions, the habitats for the populations of migratory bird species* of European importance with particular reference to: Open water and surrounding marginal habitats.	*Gadwall Shoveler	<p>Although the majority of the site is in favourable condition, Wraysbury gravel pits suffer from high levels of disturbance from recreational activities. There is the potential for other parts of the site to be adversely affected by increased recreational pressure</p> <p>Water level and water quality which maintains the open water-bodies and surrounding marginal habitats.</p>	<p>This site is made up of 6 SSSI's of which the majority are:</p> <p>100% favourable with one notable exception, Wraysbury No 1 gravel pit which came out as 100% unfavourable and declining. Staines Moor was 73% favourable and 25% unfavourable but recovering.</p>	<p>Extent and distribution of habitat</p> <p>Water depth</p> <p>Food availability</p>	<p>Increase in water demand with growth in housing and commercial development will lead to additional water extraction by Thames Water which could affect the site if extraction is from the same water source.</p> <p>Water quality may also be affected by the additional demands for wastewater treatment.</p> <p>Increased housing and commercial development could lead to increased diffuse source pollution.</p> <p>Increased recreational visits as population of the borough grows could place additional pressure on supporting habitats. (E.g. <i>Regeneration of Southall Gasworks Site</i>; see Chapter 5 for further detail)</p>	<p>Very Limited</p> <p>Very Limited</p> <p>None</p> <p>Very Limited</p>	<p>Overall growth in London leading to greater demand for water supply and wastewater treatment. Climate change effects to water supply and intensity of storm water run-off</p> <p>Overall population growth in London leading to additional recreational pressure</p>	Limited
<p>Richmond Park</p> <p>SAC UK0030246</p>		To maintain in favourable condition the habitats for the population of: Stag beetle, for which this is one of only 4 known outstanding localities in the UK.	<p>The site is surrounded by urban area and therefore experiences high levels of recreational pressure. This does not directly affect the European interest feature. The whole site has been declared an NNR.</p> <p>Decaying timber habitat currently</p>	<p>Area favourable 6%</p> <p>Area unfavourable recovering 8%</p> <p>Area unfavourable no change 86%</p>	<p>Population size of species</p> <p>Number of old broadleaved trees</p> <p>Population structure of broadleaved trees</p> <p>Condition of old broadleaved trees</p> <p>– State of decay</p>	<p>Increased recreational visits as population of the borough grows could place additional pressure on supporting habitats.</p>	<p>Very limited</p>	<p>Overall population growth in London leading to additional recreational pressure</p>	Limited

Site Name, Designation and Code	Qualifying Features		Current Condition and threats	Result of July 2006 SSSI Survey	Key Ecosystem Factors	Possible impacts arising from the Development Strategy	Is there a risk of a significant effect? (Magnitude/ duration/ reversibility /impact)	Possible impacts from other trends, plans and projects.	Is there a risk of significant 'in combination' effect?
	Habitat	Species							
			maintained by management techniques		Quantity and size of fallen broadleaved dead wood Position and degree of exposure of old broadleaved trees and stumps. Condition and position of available dead timber.				
Wimbledon Common SAC UK0030301	To maintain in favourable condition the: European dry heath, for which the area is considered to support a significant presence. Northern Atlantic wet heath with Erica tetralix, for which the area is considered to support a significant presence.	To maintain in favourable condition the habitats for the population of: Stag beetle, for which this is one of only 4 known outstanding localities in the UK.	The site is located in an urban area and therefore experiences intensive recreational pressure which can result in damage to the sensitive heathland areas. Air pollution is also thought to be having an impact on the quality of the heathland habitat. Decaying timber habitat maintained by management techniques Air quality	Area favourable 40% Area unfavourable but recovering 59%	Population size of species Number of old broadleaved trees Population structure of broadleaved trees Condition of old broadleaved trees – State of decay Quantity and size of fallen broadleaved dead wood Position and degree of exposure of old broadleaved dead trees and stumps. Condition and position of available dead timber.	Increased recreational visits as population of the borough grows could place additional pressure on supporting habitats Increased air pollution from development and increased levels of traffic.	Very limited	Overall population growth in London leading to additional recreational pressure	Limited

Addendum to Table 1

Site name, designation and code: Obtained from English Nature 'Natura 2000 Forms' and RAMSAR forms from the JNCC website

Qualifying features: Denotes the habitats and species for which the sites have been awarded EU conservation status. It is these qualifying features which the AA must safeguard. Obtained from 'Natura 2000' and RAMSAR forms. The qualifying features form the basis of English Nature's 'conservation objectives for the European interest on SSSIs', which were drawn upon for pertinent additional information.

Current condition and threats: Information pertaining to the current status of sites, recognised trends, and potential threats. From Natura 2000, RAMSAR, and Conservation Objectives forms.

Result of July 2006 SSSI condition survey: For further information on European sites which are also SSSIs - from English Nature's 2006 review of SSSI condition.

Key ecosystem factors: Denotes general ecological parameters of importance to maintaining site integrity. Summarised from the 'attributes' in the Conservation Objectives forms.

**Maintenance implies restoration if the feature is not currently in favourable condition*

In order to conduct a robust and holistic analysis of the impacts of the Strategy across the identified European Sites, environmental issues effecting the habitats and species can be understood across four primary strands as identified in the Habitats Regulations Assessment of the London Plan (Sections 4.4.1 - 4.4.4). These can be classified as follows:

- Visitor Pressure
- Air Pollution Effects
- Water Resources
- Noise / Visual Disturbance Effects

The following chapter shall detail the findings presented in the screening table (Table XX), explaining the significance of effects across the four primary strands of environmental issues above.

5. Assessing Key Environmental Issues across European Sites

The four primary strands of environmental issues as identified in the previous chapter are detailed in the following text. This analysis encompasses possible impacts arising from the Development Strategy, the risk of significant effects (Magnitude/ duration/ reversibility /impact), the possible impacts from other trends, plans and projects and whether or not there are risks of significant 'in combination' effects.

Visitor Pressure

One of the major effects upon European Sites is the impact of Visitors to the Sites. Possible impacts and changes to the sites are limited due to the distance of the borough to the habitats and species. However, as part of the screening process, the impact of visitors from Ealing to the sites is assessed.

The Development Strategy provides for 14,000 additional homes up to 2026. This will be in-combination with overall housing and population growth across London and the wider region. A growing population will put additional visitor pressure on London's green spaces including the European Sites. Provision for employment growth may also lead to additional recreational demand from workers. It is acknowledged that the identified European Sites are popular destinations for visitors from London and from further a field. This is why they have been identified as being particularly vulnerable to the impacts of recreation.

The South West London Water Bodies are popular sites for angling and water sports. These recreational activities can pose a threat to the integrity of the sites due to disturbance caused to protected wintering bird populations. Likewise at Richmond Park the majority of visitors arrive by car (62%), (Source: The Royal Parks: 2001), which can have a number of negative impacts on conservation including wildlife accidents and noise pollution. There is the risk of major blazes caused by visitors lighting small fires during long, hot, dry spells. The heaths at Wimbledon Common are sensitive to trampling.

Although serious, these threats to conservation status should generally be avoided or mitigated through local park management plans. For example, as a result of several park and traffic management studies, the Royal Parks Management introduced 20mph traffic speed limits at Richmond Park. This was introduced to reduce both accidents and noise pollution. For the South West London Waterbodies, work has been undertaken by a consortium of partners including Natural England, Thames Water and the

University of Oxford to coordinate and develop water management strategies for the sites. This is available to view at the following web address: (www.environmentbank.com/docs/SWLWaterbodies.pdf). In particular the study establishes a strategic basis for the long-term management of these important sites for nature conservation. Furthermore, the study concludes that as well as managing conflicting uses of the site, there is the possibility to enhance habitats for the birds and waterfowl through development of an overarching Strategy.

In this context, the question to be studied is whether Ealing's particular type, scale and location of development will have a significant impact upon the sensitive elements of the sites which are the reason for its designation. The HRA of the London Plan identified a schedule of strategic sites, which it deemed required lower tier assessment (i.e. within a report such as this). Forming part of a Special Opportunity Area identified in the London Plan, Southall Gasworks (within Ealing Borough) was one of the sites identified due to the scale of this development and its proximity to the waterbodies, It was noted in the report that increased visitor pressure could result in 'disturbance to bird populations and supporting habitat.' However the scale of growth in Ealing is not considered to be unusually higher than in adjacent Boroughs that have also scoped this site within a screening study, also arriving at the conclusion of 'no significant effects'.

It is considered that the direct impact of population growth in Ealing, such as that at the Southall Gas Works, will produce minimal increased visitor pressure on protected sites. None of the sites are within or directly adjacent to Ealing, and there are a number of alternative green spaces both within Ealing and in neighbouring boroughs which are more likely to experience increased demand from Ealing's residents and workers. Ealing has declared 75 Nature Conservation Sites in its Unitary Development Plan and intends to take forward 96 Sites in the LDF (Metropolitan Borough and Local Importance). These sites cover a wide range of types and uses, providing value for both natural wildlife and human enjoyment. In addition, the Borough is widely known for its significant network of parks and green spaces. Ealing's status as one of the greenest Borough's in London places it in a strong position to manage recreational demand from population growth largely within its own boundaries. It is worth noting that there are also several major green spaces in neighbouring boroughs relatively accessible to Ealing residents.

The Development Strategy sets out the Council's approach to any existing public open space deficiencies and responds to increasing pressure on open space from new development (Please refer to Chapter 5 of the Strategy). Policies require protection of open space and biodiversity, addressing areas of deficiency and identifying where development will place additional pressure on existing resources. Enhancements will be achieved either through on-site provision or contributions towards new or improved public

open space, nature conservation and play facilities. The public transport improvements planned in the Borough will also improve access to the network of open spaces and nature conservation sites.

Air Pollution Effects

Wimbledon Common is particularly vulnerable to air pollution. However the management of air pollution is generally a local issue in that one of the major contributors to air pollution is vehicle emissions, which decline exponentially with distance from the roadside. Air quality is also a London-wide problem, with a number of national targets for nitrogen dioxide, ozone and particulate matter levels exceeded. Working to improve air quality across London requires a regional response to which Ealing contributes through its Development Strategy, and also through its Air Quality Action Plan. The Action plan contains proposals to improve air quality in Ealing with the aim of achieving the National Air Quality Objectives. The plan links with Planning Policy, and also to Ealing's Interim Local Implementation Plan. It takes into account the Mayor's Air Quality Strategy and statutory guidance. The policies and proposals within this Action Plan cover six core strands:

- Traffic reduction
- Reducing the need to travel
- Promotion of cleaner technologies and alternative fuels
- Improving environmentally friendly forms of transport
- Non-traffic measures
- Awareness raising

This is further supported by the Councils Supplementary Planning Guidance (SPG) Air Quality and Pollution. The LDF Core Strategy supports the aim of the Air Quality Action Plan to meet air quality standards by providing for a spatial strategy of growth focused in key urban centres, linked by sustainable transport. This strategy directs high density residential and mix-use development towards areas of high public transport accessibility, which in turn will reduce the need for travel and promote sustainable modes of travel – key responses to improving air quality by reducing traffic emissions. The Development Strategy also supports the objectives of the AQAP through its policies to protect the environment and promote sustainable design. Policies aim to prevent and mitigate pollution impacts arising from development, including impacts on air quality, particularly within the Air Quality Management Area which covers the South of the borough and major road corridors, alongside promoting alternative modes of

transport and development of renewable energy technology. Through these policies, Ealing's contribution to the London-wide problem of air quality will be limited thus reducing the risk of an adverse impact on European Sites.

Water Resources

South West London Water Bodies are a protected area sensitive to water quality and vulnerable to change in water levels. Levels of development impact on water quality as increasing impermeable surfaces lead to greater storm water run-off and more diffuse source pollution. Diffuse source pollution is primarily managed locally through wastewater treatment, management of run-off by sustainable urban drainage systems and controls over agricultural use of fertilisers and pesticides.

Water quality is also sensitive to water supply as decreasing water levels can lead to a greater concentration of nutrients and a reduction in quality. Water supply is a London-wide issue. Housing growth and the increasing number of 1 person households (which use proportionally more water than larger households) have led to increasing domestic demand for water. For Ealing, the Infrastructure Development Plan has confirmed that water providers should have the capacity to meet anticipated future demand.

Note that within the emerging Development Management DPD, sustainable design policies are being established that will require all development to meet a high standard of sustainable design Code for Sustainable Homes Level 4 / BREEAM rating 'Very Good'. Water demand management measures are integral to these standards and will improve the Borough's performance in this regard. Also, these standards will not be fixed, and will be reviewed across the life of the Plan.

Changing water quality poses a potential significant effect on one of the screened European Sites, however development in Ealing does not directly affect the water quality of this site. Nevertheless, as Ealing draws its water from the wider Thames River Basin, (an area of 16,000km² encompassing the River Thames, its tributaries and groundwater supply) it is not possible to completely rule-out any 'in-combination' effect on the European Sites also within the Thames River Basin. Measures to manage water demand in Ealing as growth occurs will however limit the Borough's contribution to the *significance* of any 'in-combination' effects. It should also be noted that each water provider is required to produce a water resources management plan. (The current iteration is planning for the period 2010-2035, which covers the plan period of the Development Strategy up to 2026). This plan considers current and future demand, setting out the water infrastructure and supply will be required in order to facilitate the growth of London. The water companies are also planning to try and minimise the impact any increase in water demand will have on sites of

nature importance as well as the wider environment, for example through joint working with partner environmental organisations in producing the South West London Waterbodies Study.

Noise/Visual Disturbance Effects

Noise and visual disturbance effects, due to the distance between the Borough and the Sites, will be relatively limited. None of the strategically planned transport corridors run through or near to any protected sites. Furthermore, the Council is considering noise levels through its Development Management DPD and expressing mitigation measures spatially through the Development Strategy. Policies actively aim to establish lower ambient noise levels and in addition, the Strategy aims to allow for the designation of quiet areas and areas of 'tranquility'. Noise was an issue identified through the Sustainability Appraisal process as needing to be addressed and the modifications developed in the latest iteration of the Development Strategy reflect this.

6. Development Strategy Policy Impact Assessment

The Core Strategy contains a wide range of Spatial Planning policies to steer development in the Borough up to 2026. To assess these policies individually, a coding system can be used as developed by Tyldesley and Associates, 2006 in 'Draft Guidance - The Assessment of Regional Spatial Strategies and Sub Regional Strategies under the Provisions of the Habitats Regulations'.

Table 2 Excerpt from Section 5: Coding used for recording effects / impacts on European Sites (from Tyldesley and Associates, 2006, Annex 2).

Coding used for recording effects / impacts on European Sites
Reason why policy will have no effect on a European Site:
1. The policy will not itself lead to development (e.g. it relates to design or other qualitative criteria for development, or it is not a land use planning policy)
2. The policy makes provision for a quantum / type of development (and may or may not indicate one or more broad locations e.g. a county, or district, or sub-region) but the location of the development is to be selected following consideration of options in lower tier plans (development plan documents).
3. No development could occur through this policy alone, because it is implemented through sub-ordinate policies which are more detailed and therefore more appropriate to assess for their effects on European Site and associated sensitive areas.
4. Concentration of development in urban areas will not affect European Site and will help to steer development and land use change away from European Site and associated sensitive areas.

5. The policy will help to steer development away from European Site and associated sensitive areas, e.g. not developing in areas of flood risk or areas otherwise likely to be affected by climate change.
6. The policy is intended to protect the natural environment, including biodiversity.
7. The policy is intended to conserve or enhance the natural, built or historic environment, and enhancement measures will not be likely to have any effect on a European Site.
Reason why policy could have a potential effect:
8. The plan or project steers a quantum or type of development towards, or encourages development in, an area that includes a European Site or an area where development may indirectly affect a European Site.
Reason why policy would be likely to have a significant effect:
9. The policy makes provision for a quantum, or kind of development that in the location(s) proposed would be likely to have a significant effect on a European Site. The proposal must be subject to appropriate assessment to establish, in light of the site's conservation objectives, whether it can be ascertained that the proposal would not adversely affect the integrity of the site.

The following table provides an assessment of the individual Core Strategy policies against the criteria set out above.

Table 3: Development Strategy Policy Impacts on European Sites

Core Strategy Policy	Impact on Natura 2000 Site		
	South West London Waterbodies	Richmond Park	Wimbledon Common
1.1 Spatial Vision for Ealing 2026	4,5	4,5	4,5
1.2 Delivery of the Vision for Ealing 2026	4,5	4,5	4,5
2.1 Realising the potential of the Uxbridge Road/Crossrail Corridor	4,5	4,5	4,5
2.2 Regenerate Acton Town Centre	4,5	4,5	4,5
2.3 Regenerate South Acton	4,5	4,5	4,5
2.4 Regenerate the Acton Main Line station area	4,5	4,5	4,5
2.5 Regenerate Ealing Town Centre	4,5	4,5	4,5
2.6 Regenerate the Green Man Lane Estate	4,5	4,5	4,5
2.7 Enhance & Consolidate Hanwell Town Centre	4,5	4,5	4,5

2.8 Regenerate Southall Town Centre	4,5	4,5	4,5
2.9 Regenerate the Havelock Area	4,5	4,5	4,5
3.1 Realising the potential of the A40 Corridor & Park Royal	4,5	4,5	4,5
3.2 From Northolt to Perivale, Safeguard Employment Land Along the A40 Corridor	4,5	4,5	4,5
3.3 Promote Business & Industry in Park Royal	4,5	4,5	4,5
3.4 Southern Gateway, Park Royal	4,5	4,5	4,5
3.5 Greenford Town Centre	4,5	4,5	4,5
3.6 Greenford Station & Westway Cross	4,5	4,5	4,5
3.7 Neighbourhood Shopping Centres at East Acton, Park Royal, Perivale & Northolt	4,5	4,5	4,5
3.8 Residential Neighbourhoods	4,5	4,5	4,5
4.1 Enhance Residential Hinterlands	4,5	4,5	4,5
4.2 Regenerate Greenford Green & Renew Employment Sites	4,5	4,5	4,5
4.3 Regenerate Greenford Depot	4,5	4,5	4,5

4.4 Promote North-South Links	4,5	4,5	4,5
5.1 Protect and Enhance Metropolitan Green Belt	7	7	7
5.2 Protect and Enhance Metropolitan Open Land (MOL)	7	7	7
5.3 Protect & Enhance Green Corridors	7	7	7
5.4 Protect the Natural Environment – Biodiversity & Geodiversity	6,7	6,7	6,7
5.5 Promote Parks, Sports, Outdoor Recreation and Travel	5,7	5,7	5,7
5.6 Provide Additional Burial Land	4,5	4,5	4,5
6.1 Physical Infrastructure	4,5	4,5	4,5
6.2 Social Infrastructure	4,5	4,5	4,5
6.3 Green Infrastructure	5,6,7	5,6,7	5,6,7

7. Conclusions

The DPD is not likely to give rise to impacts (either alone or in combination with other plans or projects) on the European sites listed above because:

- Concentration of development in urban areas will not affect European Sites and will help to steer development and land use change away from European Sites and associated sensitive areas.
- The plan will help to steer development away from European Sites and associated sensitive areas, e.g. not developing in areas of flood risk or areas otherwise likely to be affected by climate change.
- The plan is intended to protect the natural environment, including biodiversity.
- The plan is intended to conserve or enhance the natural, built or historic environment, and enhancement measures will not be likely to have any effect on a European Site.

Having due regard for the vulnerability of sites to potential adverse impacts, for the above reasons it is considered that the DPD is not likely to have an adverse effect on the conservation objectives / integrity of the South West London Waterbodies SPA / Ramsar site, Richmond Park SAC, or Wimbledon Park SAC, alone or in combination with other plans and projects. As such, there is therefore no need to undertake task two and task three of the Appropriate Assessment process.

The Development Strategy and its components have been assessed for possible impacts on the screened European Sites. Overarching issues, which could potentially threaten the integrity of the sites, have been considered. However the distance between Ealing and the European Sites means that none of these issues will lead to any direct significant effect. The provisions of the Development Strategy have also been assessed 'in combination' with trends and development within London for adverse impacts on the European Sites. Environmental enhancement and pollution mitigation measures are incorporated into the Core Strategy, including protection and enhancement of open space and biodiversity, and sustainable location, design and construction of development. An assessment of individual policies within the Core Strategy supports the finding of no adverse effects.

References

Various guidance documents were consulted to inform the development of this report and the methodology adopted. In addition to those noted within the body of the report, key sources included:

Communities and Local Government (August 2006) - *Planning for the Protection of European Sites: Appropriate Assessment*

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