



Crofton Park and Honor Oak Park (HopCroft)
Draft Neighbourhood Development Plan (October 2016)
Habitats Regulation Assessment
Screening Report

February 2017

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This HRA screening opinion is based on the first published draft neighbourhood plan by the Crofton Park and Honor Oak Park Neighbourhood Plan (pre-Reg 14) version dated October 2016.	
Officer opinion prepare by:	Cheryl Maughan 11.01.2017
Initial officer conclusion:	An HRA is not required
Reason for initial officer conclusion:	Reason: Due to proximity of the protected sites and the nature of the proposals contained in the draft NDP
Initial opinion signed off by / Date:	Angela Steward 12.01.2017
Date set to stat consultees:	13.01.2017
Natural England response / date	16.02.2017
Date final decision made / reason:	Angela Steward 22.02.2017
Date final report published:	07.03.17

1. Introduction

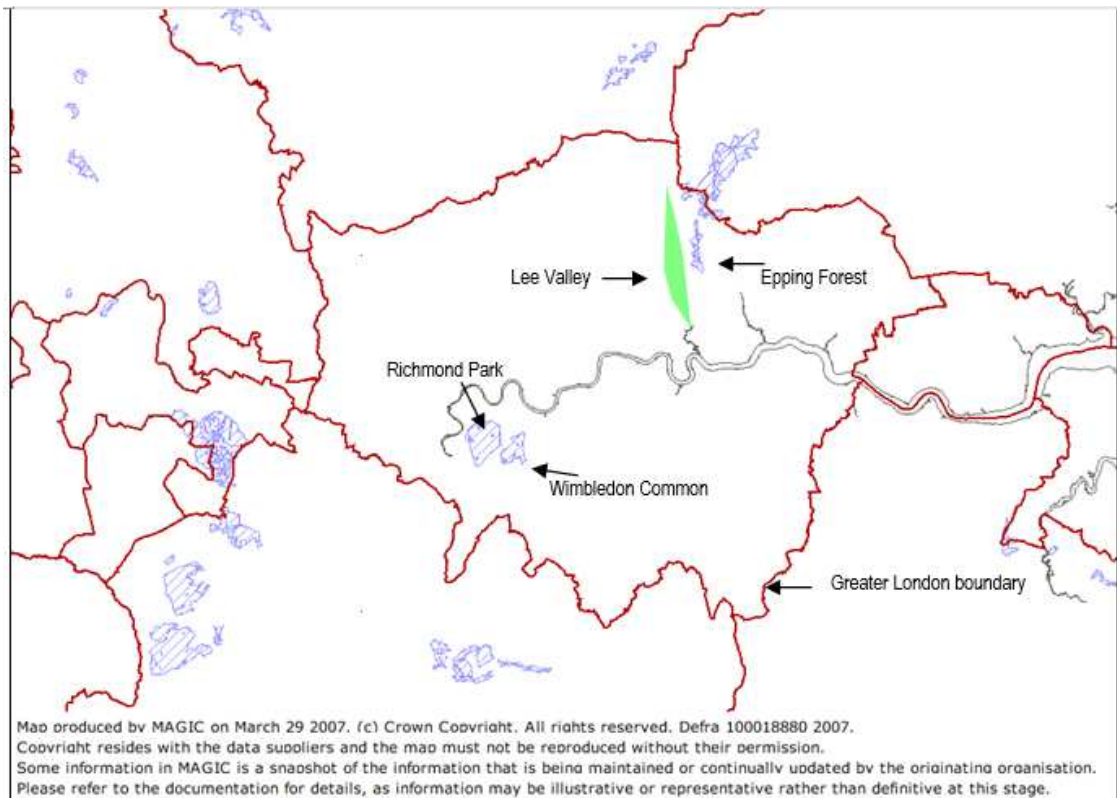
- 1.1. This report sets out the process undertaken by the Council in respect of the Habitats Regulations Assessment (HRA) screening exercise of the draft Crofton Park and Honor Oak Park (commonly referred to as HopCroft) Neighbourhood Development Plan (NDP) (October 2016), in order to assess whether the draft NDP would be likely to have a negative effect on protected European sites. If it is determined that the draft NDP is not likely to have a significant effect on protected sites then it can be screened out of the further stages of the HRA process. However, if it is found that the draft NDP is likely to have a significant effect on protected sites the Council will recommend that the draft plan undergo further stages of the HRA process which include undertaking an Appropriate Assessment, before proposing mitigation measures and alternative solutions.
- 1.2. 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.
- 1.3. The Habitats Directive was implemented in the UK through the Conservation (Natural Habitats, &c.) Regulations 1994 with all further amendments subsequently consolidated within the Conservation of Habitats and Species Regulations (2010). The Regulations are responsible for safeguarding designated European Sites and therefore protecting the habitats and species listed in the Annexes of the Directive.

2. Summary of the draft NDP

- 2.1. The HopCroft Neighbourhood Forum and Neighbourhood Area were designated as such on 16th July 2014. The Neighbourhood Forum have subsequently been preparing their draft NDP.
- 2.2. This screening report is based on the first published (pre-Regulation 14) draft of NDP dated October 2016.
- 2.3. At the time that this screening report was prepared, the HopCroft draft NDP included policies relating to:
 - Site allocations for housing
 - Housing
 - The protection and redevelopment of community facilities
 - The protection of Employment land uses
 - The protection and change of use of retail areas
 - Design and protecting areas of special local character
 - Protecting and enhancing green infrastructure
 - Encouraging sustainable modes of transport
 - Health and well-being

3. Habitats Regulations Assessment Screening

- 3.5. The Honor Oak Park and Crofton Park Neighbourhood Development Plan, once adopted, will form part of the Development Plan for the London Borough of Lewisham. The Council's Core Strategy, Site Allocations and Development Management Local Plans have been subject to both SA and SEA as well as HRA screening.
- 3.5. No designated European sites fall within the NDP area, nor are any located within the London Borough of Lewisham boundary. However, consistent with the best practice approach, European Sites within a 15km radius of the borough boundary have been included in this screening assessment (see map and table below).



(Source: part www.magic.gov.uk and part LB Lewisham)

Map 1: Designated European Sites within 15km of Lewisham

Table 1: European Site Descriptions

European Site name	Reasons for designation
<p>1. Lee Valley SPA and Ramsar (wetland) (Site reference UK9012111 UK11034)</p>	<p>General site character</p> <ul style="list-style-type: none"> • Inland water bodies (standing water, running water) (67%) • Bogs. Marshes. Water fringed vegetation. Fens (4%) • Humid grassland. Mesophile grassland (8%) • Improved grassland (10%) • Broad-leaved deciduous woodland (10%) • Other land (including towns, villages, roads, waste places, mines, industrial sites (1%) <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 of wintering wildfowl, in particular Gadwall <i>Anas strepera</i> and Shoveler <i>Anas clypeata</i>, which occur in numbers of European importance.</p>

European Site name	Reasons for designation
	<p>Areas of reedbed within the site also support significant numbers of wintering Bittern <i>Botaurus stellaris</i>.</p>
<p>2. Richmond Park SAC (UK0030246)</p>	<p>General site character</p> <ul style="list-style-type: none"> • 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 woodland (25%) • Mixed woodland (5%) <p>Richmond Park is located in south west London and 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>3. Wimbledon Common SAC (UK0030301)</p>	<p>General site character</p> <ul style="list-style-type: none"> • 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%) <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>4. Epping Forest SAC (UK0012720)</p>	<p>General site character</p> <ul style="list-style-type: none"> • Inland water bodies (standing water, running water) (6%) • Bogs. Marshes. Water fringed vegetation. Fens (0.2%) • Heath. Scrub. Maquis and garrigue. Phygrana (3.8%) • Dry grassland. Steppes (20%) • Broad-leaved deciduous woodland (70%) <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: European site information

Natura 2000 site	Designation code	Qualifying interest ¹ (Habitats and species)	Conservation objectives	Site sensitivities	Current condition ²	Threats
Lee Valley SPA / Ramsar (447.87 ha)	UK9012111 UK11034	<p>SPA:</p> <p>Over winter:</p> <ul style="list-style-type: none"> • <i>Botaurus stellaris</i> (bittern) <p>Over winter:</p> <ul style="list-style-type: none"> • <i>Anas strepera</i> (gadwall) • <i>Anas clypeata</i> (shoveler) <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"> • open water and surrounding marginal habitats • Gadwall, Shoveler <p>*maintenance implies restoration if the feature is not currently in favourable condition.</p> <p>The Conservation</p>	<ul style="list-style-type: none"> • 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 • Water levels – a high and stable water table is fundamental • Disturbance to bird feeding and roosting habitat (noise / visual) • Siltation (e.g. excessive poaching) 	<p>Walthamstow Reservoirs, Waltham Abbey and Turnford and Cheshunt Pits are 100% favourable.</p> <p>Rye Meads are 40% favourable and 60% unfavourable but recovering.</p> <p>Walthamstow Marshes are 100% 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>

¹ 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.

² 2013 condition survey

			<p>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 within: Amwell Quarry SSSI, Rye Meads SSSI, Turnford and Cheshunt Pits SSSI and Walthamstow Reservoirs SSSI.</p>	<p>of lake margins by stock, suspended sediments leading to transport of nutrients)</p> <ul style="list-style-type: none"> • Scrub or tree encroachment (leading to shading, nutrient and hydrological effects • Spread of introduced non-native species • Recreational pressure/disturbance (particularly on-water activities with potential to disturb sediment and increase turbidity in lakes) • Development pressure • Diffuse air pollution from traffic and agriculture 		
<p>Richmond Park (846.68 ha)</p>	UK0030246	<ul style="list-style-type: none"> • <i>Lucanus cervus</i> (stag beetle) 	<p>The conservation objectives for the European interest on the SSSI are:</p>	<ul style="list-style-type: none"> • Water level • Water quality – nutrient enrichment from fertiliser run-off etc. 	Area unfavourable recovering 100%.	Site is surrounded by urban areas and experiences high levels of recreational pressure. This does not directly affect the

			<p>to maintain, in favourable condition, the habitats for the population of:</p> <ul style="list-style-type: none"> • <i>Lucanus cervus</i> (stag beetle) <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"> • Scrub encroachment (often due to undergrazing) • Development pressure • Spread of introduced non-native species • Human disturbance (off-road vehicles, burning (vandalism)) • Atmospheric pollution e.g. nitrous oxides from vehicle exhausts 		<p>European interest feature however.</p>
<p>Wimbledon Common SAC (348.31 ha)</p>	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 this site:</p> <ul style="list-style-type: none"> • Northern Atlantic wet heaths with <i>Erica tetralix</i> • European dry heaths 	<p>The conservation objectives for the European interest on the SSSI are:</p> <ul style="list-style-type: none"> • to maintain*, in favourable condition, the: <ul style="list-style-type: none"> ○ Northern Atlantic wet heaths with <i>Erica tetralix</i> ○ European dry heaths • to maintain*, in favourable condition, the habitats for the population of: <ul style="list-style-type: none"> ○ Stag beetle (<i>Lucanus cervus</i>) 	<ul style="list-style-type: none"> • Water quality – e.g. pollution through groundwater and surface run-off sources • Water level – maintenance of water table • Heavy recreational pressure • Spread of non-native/ invasive species • Scrub encroachment • Atmospheric pollution (nutrient deposition and acidification) 	<p>Area favourable declining 5%</p> <p>Area unfavourable but recovering 95%</p>	<p>Site is located in an urban area and experiences intensive recreational 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>

			*maintenance implies restoration if the feature is not currently in favourable condition.			
Epping Forest SAC (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"> Atlantic acidophilous beech forests with Ilex and sometimes also Taxus in the shrublayer (Quercion robri-petraeae or Ilici-Fagenion) <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"> Northern Atlantic wet heaths with <i>Erica tetralix</i> European dry heaths <p>Annex II species that are a primary reason for selection of this site:</p>	<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, SPA, Ramsar) as individually listed in Table 1.</p> <p>Habitat Types represented (Biodiversity Action Plan categories)</p> <ul style="list-style-type: none"> Lowland wood pastures and parkland 	<ul style="list-style-type: none"> Water quality – e.g. pollution through groundwater and surface run-off sources Water level – maintenance of water table essential e.g. restrict new drainage ditches around wet woodlands Heavy recreational pressure Spread of non-native/ invasive species Scrub encroachment Atmospheric pollution (nutrient deposition and acidification) Development pressure 	<p>Area favourable 37%</p> <p>Area unfavourable recovering 45%</p> <p>% area unfavourable no change 16%</p> <p>% area unfavourable declining 2%</p> <p>Reintroduction of pollarding and wood pasture management is helping to reverse the decline of the</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 areas.</p>

		<ul style="list-style-type: none">• <i>Lucanus cervus</i> (stag beetle)	<ul style="list-style-type: none">• Broadleaved, mixed and yew woodland• Dwarf shrub heath• Acid grassland• Neutral grassland• Standing open water and canals• Fen marsh and swamp		epiphytic bryophyte population.	
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Effects of NDP on European sites:

3.3 This section considers the policies in the draft NDP and their potential impacts on the European sites.

Table 3: Assessment of polices in the draft NDP on European sites

Policy	Impact Y/N	Comment
G1 Management of Development and Change	N	No impact – the policy is an overarching policy that does not promote development but seeks that development should accord with the NDP as a whole
H1 Housing	N	No impact – the policy seeks to guide the mix of dwellings
SA1 Land at Whitbread Road	N	The impacts could include increased population and associated impacts such as increased vehicular movement / pressure on resources such as recreation but these aren't likely to occur due to the distance of the site from the protected nature sites in relation to the size of the development proposed
SA2 Land adjacent to Honor Oak Station	N	This policy contains criteria for a scenario in which if a development comes forward on this SINC site, rather than allocating a quantum of development. Although a SINC site, this is not a European protected site. This will be considered as part of the SEA.
C1 Protection and Enhancement of community facilities	N	No impact. This policy seeks to identify and protect community facilities.
C2 Redevelopment of Community Assets	N	No impact. This policy seeks to provide criteria for the assessment of the redevelopment of community assets.
E1 Employment Sites and Enterprise	N	No likely impact. This policy stipulates preferred uses within the employment sites which are not in close proximity to protected sites.
E2 Malham Road Area of Intensification	N	Impact could include associated vehicle movements but this could be controlled through the planning application process and this allocation is not close to a protected site.
SA3 Beecroft Mews	N	Impact could include associated vehicle movements but this could be controlled through the planning application process and this allocation is not close to a protected site.
NC1 Protection and Enhancement of Local Neighbourhood Centres	N	No impact. This policy sets out preferred uses in the retail centres.
NC2 Protection and Enhancement of Local Neighbourhood Parades	N	No impact. This policy sets out the preferred uses in retail centres.
NC3 Brockley Rise / Stanstead	N	No impact. This policy does not lead to development itself.

Policy BE1 Design of New Development	N	No impact. This policy governs the form of development. It does not directly impact the amount of development realised.
Policy BE2 Extensions and Alterations to Existing Buildings	N	No impact. This policy governs the form of development. It does not directly impact the amount of development realised.
Policy BE3 Area of Special Local Character	N	No impact. This policy governs the form of development. It does not directly impact the amount of development realised.
Policy GS1 Protecting Green Space	N	No impact. This policy aims to protect green space.
Policy GS2 Greening the Neighbourhood	N	No impact. This policy aims to deliver new tree planting and landscaping and protect trees in good health.
Policy GS3 Designation of Local Green Chain Walk	N	No impact. This policy aims to improve connections between a number of public parks.
Policy GS4 Protection of Local Sites of Conservation Interest and Designation of Local Nature Reserves	N	No impact. This policy aims to designate a LNR and protect LNRs.
T1 Enhancement of Brockley Corridor	N	No impact. This policy aims to improve pedestrian / cycling routes, improve air quality, reduce the dominance of motor vehicles, encourage the use of sustainable public transport, substantial planting along the corridor and parking provision for car club vehicles and electronic charging points.
Policy T2 Pedestrians	N	No impact. This policy aims to improve pedestrian access in the area.
Policy T3 Cyclists	N	No impact. This policy aims to improve cycle routes.
Policy T4 Public Transport	N	No impact. This policy aims to improve the capacity and quality of public transport.
Policy HW1 Managing Flood Risk	N	No impact. This policy aims to achieve improved outcomes from development in terms of surface water flooding and mandates requirements for the incorporation of sustainable drainage systems.
Policy HW2 Improving Air Quality	N	No impact. This policy aims to improve air quality along the Brockley corridor through measures such as green walls and tree planting.

In combination effects:

3.5 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 current development plan in Lewisham is the London Plan (2016), the Lewisham Core Strategy (2011), Site Allocations Local Plan (2013), Lewisham Town

Centre Local Plan (2013), and Development Management Local Plan (2014). Material considerations include national planning policy statements and planning policy guidance. Policy 7.19 of the London Plan (2016) relates to biodiversity and access to nature and all planning decisions will need to be made in accordance with this policy.

3.6 It is neither practical nor necessary to assess the ‘in combination’ effects of a draft NDP within the context of all other plans and projects within London. The plans and projects of all other London boroughs are relevant but in practice the London Plan, as the overriding Regional Spatial Strategy for London, encompasses their growth and infrastructure trajectories at a strategic level with apportionments and allocations for housing, transportation and commercial/industrial development. 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.

3.7 Neighbouring boroughs’ Development Plans considered as part of the in combination assessment are listed below:

- London Borough of Bexley – Core Strategy (Adopted February 2012)
- London Borough of Bromley Unitary Development Plan (Adopted July 2006)
- Royal Borough of Greenwich – Core Strategy (Adopted July 2014)
- London Borough of Lambeth Local Plan (Adopted September 2015)
- London Borough of Southwark – Core Strategy (Adopted April 2011) and Southwark Plan (2007) (saved policies)
- London Borough of Tower Hamlets – Core Strategy (Adopted September 2010) and Managing Development Document (MDD) (Adopted April 2013)

3.8 Taking into account the nature and quantum of development to take place within Lewisham, the neighbouring boroughs and London city region, the draft NDP are evaluated for their effects on the protected sites below, as shown in table 4.

Table 4: HRA screening for draft NDP policies

Possible Impact on European Sites	Probability, likely duration, frequency and reversibility of the impact	Significant effect on protected habitats/species
Recreational Pressure	Due to the distance of the four protected sites and the modest allocations proposed, it is unlikely that the proposals in the plan would lead to additional recreational pressure on the protected sites.	N

Air Quality	Given the scale of the development and the distance to the protected sites, any net effect on air quality would be minimal and without any discernible impact on the European sites.	N
Spread of Pest Species	The draft NDP does not contain any proposals which might increase the risk of the spread of pest species.	N
Water Resources	The allocation of a site for housing may result in a net increase in water use on the land. However, given the limited quantum of development proposed the impact would be insignificant, both in the context of the Borough and the European sites. Secondly, the current Local Planning Framework contains strong policies to ensure efficient water use within new development.	N
CO ² emissions	The intensification of the housing and LEL site raises the potential for higher CO ² emissions from the site with a subsequent contribution to the aggravation of climate change which in turn may have a negative impact on protected sites. However, firstly the development proposed is minimal and therefore no discernible impact on European sites would result. Secondly, the current Local Planning Framework contains strong policies to minimise CO ² emissions from new development.	N

4. Conclusion

4.1. Screening of the emerging HopCroft NDP Local Plan 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 Local Plan preparation process:

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

- 4.2. Since there are no European Sites within the borough and those identified for the screening are within 15km of the borough boundary, the determination of this assessment is that none of the policies contained in the draft NDP has been found to have a likely significant effect on any designated European Site.
- 4.3. In particular, the draft NDP either on its 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 tasks two and three of the Habitats Regulation Assessment.
- 4.4. This conclusion is supported Natural England (please see appendix 1 for the representation made by Natural England).

Appendix 1: Natural England consultation response

Maughan, Cheryl

From: Harries, Sally (NE) <Sally.Harries@naturalengland.org.uk>
Sent: 16 February 2017 07:57
To: Maughan, Cheryl
Subject: 205936 Draft SEA screening report & draft HRA screening report for the draft Crofton Park and Honor Oak Park Neighbourhood Development Plan Lewisham
Attachments: NE Feedback Form June 2015.PDF

Dear Cheryl

Thank you for consulting Natural England on the screening reports for Crofton Park and Honor Oak Park Neighbourhood Plan. Having reviewed the screening assessments along with the neighbourhood plan I can concur with your assessments. Natural England is satisfied that the plan will not impact on European sites in the vicinity therefore no HRA is required. However, an SEA is needed due to potential environmental impacts resulting from the policies within the plan.

Do let me know if I can be of further help.

Kind regards

Sally Harries

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Please note: My working week is Monday - Thursday.

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