



**Elmbridge**  
Borough Council

*... bridging the communities ...*

## **Habitat Regulations Assessment Screening Report**

### **Settlement Investment and Development Plans**

## 1. Introduction

1.1 Elmbridge Borough Council is currently producing a Settlement Investment and Development (“ID”) Plan as part of its Local Plan. This document will allocate land for development, identify key designations and outline key community priorities regarding infrastructure provision.

### Requirements of the Habitats Regulations

1.2 The European Directive (92/43/EEC) on the conservation of Natural Habitats and Wild Flora and Fauna (the Habitats Directive) protects habitats and species of European nature conservation importance. The Habitats Directive established a network of internationally important sites designated for their ecological status. These are referred to as Natura 2000 sites or European Sites and comprise of Special Areas of Nature Conservation (SAC) and Special Protection Areas.

1.3 Article 6 of the Habitats Directive and Regulation 48 of the Habitats Regulations 2010 states the need to determine if an Appropriate Assessment (AA) is required for proposed plans or projects which are not necessary for the management of the site but which are likely to have a significant effect on one or more Natura 2000

1.4 The amended 2007 Habitats Regulations are currently only supported by draft guidance on “Planning for the Protection of European Sites: Appropriate Assessment” (Department of Communities and Local Government (DCLG), 2006) although European guidance also exists. Guidance on HRA suggests a three-stage process:

1. **Screening** – Determining whether a plan in itself or ‘in combination’ is likely to have a significant effect on a European site. If “yes” then proceed to full AA.
2. **AA** – Determining whether, in view of the site’s conservation objectives, the plan, in itself or in combination’, would have an adverse effect (or risk of this) on a European site;
3. **Mitigation & Alternatives** - Assessment of mitigation and alternative solutions – where the plan is assessed as having an adverse effect (or risk of this) on the integrity of the site, there should be an examination of the alternatives. If it is not possible to identify mitigation or alternatives, it will be necessary to establish the ‘imperative reasons of overriding public interest’ (IROPI). This is not considered a standard part of the process and will only be carried out in exceptional circumstances.

1.5 This report addresses the first stage of this process and seeks to determine whether the Council’s policies and proposals set out in the Elmbridge Borough Council Settlement ID Plans will have any significant adverse impacts on nearby Natura 2000 sites either on its own or in combination with other plans or proposals.

1.6 This screening statement has been developed with close reference to the Elmbridge Core Strategy Habitat’s Regulations Assessment (HRA), as well as those of adjoining boroughs, particularly Mole Valley District Council (MVDC), Reigate and Banstead Borough Council (RBBC) and Spelthorne Borough Council (SBC). Natural

England has been positively engaged in the HRA of the Elmbridge Core Strategy and this document takes account of comments previously received, as well as ongoing discussions and consultation.

### **Scope of the Settlement “ID” Plans**

1.7 Settlement Investment and Development (ID) Plans will detail the strategic site allocations and strategic designations required to support the delivery of the Core Strategy. The ID Plans will also set out the priorities for infrastructure delivery to support the levels of growth, and the broad locations of growth, set out in the Core Strategy. There will be eight separate Plans, one for each of the settlement areas set out in the Core Strategy. Allocations and designations will be set out within each of the separate plans.

1.8 Allocations will set out the expected type and amount of development on strategic sites in the Borough and will include sites delivering:

- Housing
- Traveller pitches
- Employment
- Retail
- Leisure
- Infrastructure (such as schools, libraries, flood defences etc)

1.9 Designations will maintain specific uses on important sites and will include:

- Strategic Employment Land
- Open Space
- Traveller pitches

1.10 The Plan will not establish levels of development above that set out in the Core Strategy or seek to alter any designation other than those listed above. The plan will also work in combination with other Plans and SPDs to support the overall objectives as set out in the Core Strategy. This screening assessment has therefore taken account of the extensive work that went into the screening and subsequent Appropriate Assessment that was undertaken for the Core Strategy.

1.11 This screening report will therefore concentrate on whether any of the specific proposals within the Settlement ID Plans will give rise to any significant direct and indirect impacts on the Natural 2000 sites identified through the Appropriate Assessment of the Core Strategy.

### **Screening Method**

1.12 In accordance with official guidance and current practice the following method was used to conduct the screening of the Settlement ID Plans. The approach combines both a plan and a site focus.

- The plan focus first screens out those elements of the plan likely to affect European site integrity and then considers the impacts of the remaining elements on European sites, including the potential for in-combination impacts.
- The site focus considers the environmental conditions of the site and the factors required to maintain site integrity, and looks at the potential impacts the plan may have.

## 2. Background

2.1 The Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Flora and Fauna – the ‘Habitats Directive’ provides legal protection for habitats and species of European importance through the establishment and conservation of a network of sites known as ‘Natura 2000’ sites (European sites). European sites comprise Special Areas of Conservation (SAC) designated under the Habitats Directive and Special Protection Areas (SPA) designated under the Birds Directive (Directive 79/406/EEC on the conservation of wild birds). Planning Policy Statement 9: Biodiversity and Geological Conservation includes an expectation that listed Ramsar sites receive the same protection as designated SPAs and SACs.

2.2 Articles 6(3) and 6(4) of the Habitats Directive require an ‘appropriate assessment’ (known as a Habitats Regulations Assessment (HRA) of plans and projects likely to have a significant effect on a European site. Following a European Court Judgement ruling in October 2005, the Department of Environment, Food and Rural Affairs (DEFRA) published draft amendments to the Habitats Regulations, which transpose the requirements of the Directive into UK legislation, to require UK land use plans, as well as projects, to be subject to ‘HRA’.

2.3 The purpose of HRA is to assess the impacts of plans against the conservation objectives of a European site. The assessment must determine whether the plan would adversely affect the integrity of the site in terms of its conservation objectives. Where adverse effects are identified these effects should be mitigated and other options should be explored.

2.4 The Habitats Directive applies the precautionary principle. A plan should only be permitted if it can be demonstrated that it will not adversely affect the integrity of the European site. However, in exceptional circumstances and as an exception to the rule, where negative effects cannot be mitigated, a plan may still be permitted if there are ‘imperative reasons of overriding public interest’. These cases are rare. In such cases, compensation will be necessary to ensure the overall integrity of the site network.

2.5 In April 2012 the Government published the National Planning Policy Framework (NPPF) which replaced all existing Planning Policy Statements, Planning Policy Guidance and many of the circulars that previously set out government policy on strategic planning and development control. Paragraph 166 of the NPPF states the need for local plans, where required, to undergo a variety of environmental assessments as directed by the by European legislation such as the Habitats Regulations. The NPPF also states that:



- wherever possible assessments should share an evidence base and be conducted over similar timescales; and
- assessments should be proportionate and not repeat policy assessment that has already been undertaken.

2.6 Therefore in making any assessment of the possible impact of the Plan the findings of the Appropriate Assessment of the Core Strategy proposed mitigation measures set out in the Core Strategy have been taken into account.

### **The Appropriate Assessment of the Core Strategy**

2.7 The Screening Assessment of the Core Strategy found that the level of development and approach to the distribution of that development would be unlikely to have a significant effect on any of the Natura 2000 sites identified except for the effects of increased urbanisation and the potential increase in recreational use from residential development on the vegetation and birds in the Thames Basin Heaths Special Protection Area (SPA). Consequently an appropriate assessment for the Thames Basin Heaths SPA was undertaken and which sets out the avoidance and mitigation measures that were eventually adopted in the Core Strategy.

2.8 It is widely recognised and accepted that avoidance and mitigation measures are required to safeguard the SPA from recreational and urbanisation effects arising from new housing. This matter was addressed in detail in the Examination of the Draft South East Plan. Consequently, the South East Plan set out in policy NRM6 a two part approach to avoiding and mitigating the effects of increased recreational disturbance and urbanisation including on-site access management measures and off-site avoidance measures such as the provision of alternative open space.

2.9 A Joint Strategic Partnership Board (JSPB) was set up to take forward, agree and deliver the mitigation and avoidance measures identified. The board comprises representatives of the affected local authorities, Government Office of the South East, South East England Partnership Board, Natural England, Wildlife Trusts, amongst others. In February 2009, the Board agreed a Joint Delivery Framework, which sets out details of mitigation and avoidance measures based on South East Plan Policy NRM6 to avoid adverse impact on the SPA.

2.10 However, following the general election May 2010 the new Coalition government made it clear the Regional Spatial Strategies would be removed from the planning policy framework. The Council therefore set out the mitigation approach from the South East Plan in its Core Strategy.

2.11 Policies CS13 Thames Basin Heaths Special Protection Area, CS14 Green Infrastructure and CS15 Biodiversity are the key policies in the Core Strategy outlining how the Council will ensure any impact on key sites that may arise is mitigated.

2.12 The mitigation measures include the provision of both on-site and off-site measures. On-site measures will be delivered through the Strategic Access Management and Monitoring (SAMM) project that will provide wardening and information



on visitor numbers and their impact. Off-site avoidance measures will be provided through the delivery of alternative open space for recreation known as Suitable Alternative Natural Greenspace (SANG). Full details are provided in policy CS13 Thames Basin Heaths Special Protection Area in the Core Strategy.

2.13 These measures will be paid for directly from new development through developer contributions. These are currently set out in the Council’s Planning Obligations and Infrastructure SPD which will be replaced by the Council’s Developer Contributions SPD on the adoption of a CIL Charging Schedule.

2.14 In the absence of the proposed measures there is the potential for the Elmbridge Core Strategy to have in-combination impacts with other plans. However, by implementing the avoidance and mitigation measures outlined above the plan itself will have no effect. Furthermore, each of the local authorities where development has the potential to impact on the Thames Basin Heaths SPA have already or are in the process of producing a Core Strategy Plan, which will be accompanied by an HRA identifying potential adverse impacts and, where possible, avoiding or removing these.

### 3. Screening Assessment

#### European sites that could be effected by the Plan

3.1 In considering those sites upon which the potential for significant effects may exist, a precautionary approach has been adopted, and all sites within 15 km (linear) of the borough boundary have been included. This approach has previously been supported by Natural England in the screening work undertaken by other boroughs. The extent of the area of search reflects the likely ‘reach’ of any impacts arising from the Elmbridge Core Strategy. This is not an exact science and any wider impacts identified would also have to be considered.

3.2 Table 1 below lists those European sites lying within 15km (linear) of the Borough boundary and Appendix 1 contains a map indicating their location. Only the Thames Basin Heaths SPA and South West London Waterbodies SPA are within the boundaries of Elmbridge, all other sites are located outside of the Borough.

**Table 1: European sites within 15km of the Borough boundary**

Site Name	Designation	Straight line distance from borough boundary (km)	Site area (ha)	Brief reason for designation
Mole Gap to Reigate Escarpment	SAC	4	887.68	Calcareous grassland important for its box scrub
Richmond Park	SAC	4.5	846.68	Important for Stag Beetle
South West London Waterbodies	SPA (RAMSAR)	Within and around	828.14	Important over wintering site for Gadwell and Shoveler



Site Name	Designation	Straight line distance from borough boundary (km)	Site area (ha)	Brief reason for designation
Thames Basin Heaths	SPA	Within and around	8274.74	Lowland heath with important populations of Nightjar, Dartford Warbler and Woodlark
Thursley, Ash, Pirbright & Chobham	SAC	8	5138	Lowland heaths
Wimbledon Common	SAC	5.9	348.31	Important for Stag Beetle
Windsor Forest & Great Park	SAC	10.5	1687.26	Veteran Oaks, violet click beetles

### Existing trends and future development

3.3 The amount and distribution of development expected in Elmbridge is set out in the Core Strategy. Policy CS1 sets out the overarching spatial strategy for the Borough. It states that all new development will be delivered in the urban area, with the majority of development occurring on previously developed land.

3.4 Policy CS2 Housing sets out a housing target of 3375 new units to be delivered over the next 15 years. The expected levels of residential development within each settlement area is also outlined in policy CS2 of the Core Strategy. These are not targets, they are estimates of the potential for development and could be either higher or lower than indicated. These are outlined below:

- Walton – 675 to 725
- Weybridge – 625 to 675
- East and West Molesey – 350 to 400
- Esher – 475 to 525
- Long Ditton, Thames Ditton, Hinchley Wood and Weston Green – 372 to 425
- Cobham, Oxshott, Stoke D'Abernon and Downside – 575 to 625
- Claygate – 50 to 100

3.5 The level of development for other uses such as retail and employment uses is expected to be significantly smaller. Evidence used in the preparation of the Core Strategy shows that the demand for office floorspace can be accommodated from existing vacancies and the demand for industrial floorspace will decline slightly. The only area where there is potential for growth is in warehousing, however, this is relatively small and will be accommodated within existing employment areas as set out in policy CS23 Employment Land.



3.6 There is not expected to be any significant increase in demand for either comparison or convenience retail floorspace. However, any growth in retail, leisure and office uses in future will be directed to town centres as set out in policy CS18 Town centres and CS23 Employment land.

### **Settlement ID Plans: screening of policies**

3.7 The first stage of the preparation of these plans has been the identification of:

- sites with the potential for redevelopment,
- areas for designation as open space or Local Green Space
- the designation of all existing Gypsy and Traveller sites
- The designation of Strategic Employment Land

3.8 All the sites put forward for allocation or designation were first screened against the Core Strategy policies, including policies that impact on the Thames Basin Heaths. Any sites not in conformity with the Core Strategy were not taken forward to later assessments and have not been considered within this Screening Report.

3.9 Following this initial screening of the sites identified the Council are required to set out all reasonable options for the redevelopment of each site. The process of identifying these options is set out in the Site Assessment Methodology. In combination the options set out for each site in the ID Plans would not deliver more development than the levels set out in the Core Strategy. In addition any development that came forward through these allocations would be subject to the policies set out in Core Strategy and as such would be subject to the mitigation measures set out policy CS13 Thames Basin Heaths Special Protection Area.

3.10 Therefore, in screening both the allocations and designations set out in the Settlement ID Plans against the Habitats Regulations the Council is of the opinion that they will not have any additional impact than that set out in the Core Strategy. However, the Council is aware that development outside of existing 5km zone could potentially impact on the SPA and as such require appropriate mitigation to be delivered.

3.11 To address this the Council has identified those potential development sites that are outside of the zone of influence but have the potential to have a significant impact on the SPA. As set out in the Joint Delivery Framework only sites that could deliver in excess of 50 units between 5km and 7km are considered of being sufficient scale and proximity as to potentially require mitigation<sup>1</sup>. Two sites have been identified that meet this criteria and are set out in Table 2 below.

---

<sup>1</sup> Paragraph 4.4 Thames Basin Heaths Special Protection Area Delivery Framework. Thames Basin Heaths Joint Strategic Partnership Board (2009)

**Table 2: Potential sites**

Site Reference	Site name	Proposed options
DEV/HER4	Rydens Enterprise School	<p><b>Option A</b> – Allocate land to the east of the existing school for the provision of a new 10 form of entry secondary school with the old school site being redeveloped for housing</p> <p><b>Option B</b> – Allocate land elsewhere within the site for the provision of a new 10 form of entry secondary school with the old school site being redeveloped for housing</p> <p><b>Option C</b> – Allocate land to the east of the existing school for the provision of a new 10 form of entry secondary school with the old school site providing open space to compensate for the loss</p> <p><b>Option D</b> – Allocate land elsewhere within the site for the provision of a new 10 form of entry secondary school with the old school site providing open space to compensate for the loss</p> <p><b>Option E</b> – Allocate for expansion of existing school facilities (Education Opportunity Area) to accommodate an increase in pupil numbers.</p> <p><b>Option F</b> – Do not allocate for the provision of a new school and associated housing development (as existing)</p> <p><b>Option G</b> – Do not allocate for expansion of existing school facilities (as existing)</p>
DEV/WAL37	Walton Court	<p><b>Option A</b> – Allocate for a change of use with the potential to deliver up to 180 dwellings</p> <p><b>Option B</b> – Allocate for a change of use with the potential to deliver up to 150 dwellings</p> <p><b>Option C</b> – Allocate for a development of a hotel</p> <p><b>Option D</b> – Do not allocate (as existing)</p>

3.12 An assessment of the potential impact of these sites on the THB SPA will only be required where the option taken forward is for residential development over 50 units. This will be undertaken prior to setting out the proposed development option and will include the identification of appropriate mitigation.

**In combination effects of other plans**

3.13 The in combination effects of other plans are set out on page 9 of HRA for Core Strategy. Any changes to the development plans and polices in or around Elmbridge set out in Table 2 of the HRA for the Core Strategy are set out in Table 3 below.

**Table 3: In combination effects**

Plan	Proposal
Tandridge District Council: Core Strategy	No change. Published a statement of intentions setting out why the Council does not intend to review the adopted housing requirement set out in its Core Strategy.



Plan	Proposal
Epsom and Ewell: Core Strategy	No change
Royal Borough of Kingston upon Thames: Core Strategy	Adopted Core Strategy in 2012. Annual housing target of 375 to meet plan period (2012 to 2026) of 5625. HRA Screening report indicated that stage 2 and 3 of the assessment not required. This position was supported by Natural England.
Mole Valley District Council: Core Strategy	No Change
Spelthorne Borough Council: Core Strategy	No change
Runnymede Borough Council: Core Strategy	Draft Local Plan Core Strategy being consulted on between 14 February and 28 March 2013. Appropriate Assessment in preparation.
Woking Borough Council: Core Strategy	Core Strategy adopted in October 2012. 4964 homes proposed between 2010 and 2027. Appropriate Assessment undertaken with appropriate polices set out in the Core Strategy to mitigate the potential impacts of housing.
Guildford Borough Council: Core Strategy	Published an interim housing delivery target of 322 homes per annum. This will be used until the adoption of its Core Strategy, planned for 2014. AA still in preparation.
Reigate and Banstead: Core Strategy	Core Strategy submitted for examination in May 2012. Following an exploratory meeting with the inspector the Council are consulting on further amendments. Core Strategy sets out the proposal to deliver 6900 homes between 2012 and 2027. An average of 460 homes per annum. HRA of the Core Strategy published in 2012 and states that there will be no potential impacts on European sites. NE concur with this assessment.
Richmond Borough Council	No change
Surrey Waste Plan	No change
Surrey Mineral Plan	Adopted in 2009. Natural England stated that they had no objections to the Plan based on the information and proposed mitigation set out in both the plan and HRA. No change to the risks as set out in the HRA for the Elmbridge Core Strategy.
Surrey Local Transport Plan 3	The third Surrey Local Transport Plan was adopted in April 2011. The Screening Report prepared to ascertain whether a HRA was required found that there would be no adverse effects of the transport plan alone or in combination with other plans.
Surrey Hills AONB Management Plan 2009-2014	The plan sets out the vision, policies and plans for the future management of the Surrey Hills Area of Outstanding Natural Beauty. An SEA was undertaken on the Plan but not AA.



Plan	Proposal
River Mole Flood Alleviation Strategy	No change
Lower Thames Flood Risk Management Strategy	The delivery of this strategy is currently on hold due to the lack of available funding. A full assessment will be prepared at a later stage once more detail to the final proposals are known.
Water Resources Management Plans	No change.
The Mole: Catchment Abstraction Management Strategy (CAMS)	No change
Strategic Flood Risk Assessments	No change. Planned to update the existing SFRA for Elmbridge in 2013.

3.14 There are no significant changes with regard to other plans and strategies that impact on the European sites identified as potentially being adversely effected by plans and strategies in Elmbridge.

### Identification of likely impacts

3.15 The potential impacts of development on European sites is set out in section 3.4 of the HRA for the Elmbridge Core Strategy. As Settlement ID Plans will not set out housing delivery above the levels established in the Core Strategy the likely impacts will be the same.

### Possible effects of the Settlement ID Plans

3.16 Settlement ID Plans do not identify sites that will deliver, in combination, more development than that proposed in the Core Strategy or change the Spatial Strategy set out in the Core Strategy. The document will identify strategic development sites and protect key areas from inappropriate development through strategic designations for employment and open space. Any decisions regarding allocations and designations will be taken with regard to the Core Strategy and where they are not in conformity with the Core Strategy will not be taken forward into the main document. As such the possible effects, both alone and in combination, of this Plan should not vary from those established for the Core Strategy.

3.17 However, to ensure that the effects of this Plan do not differ from those outlined in the Core Strategy the potential effects on identified Natura 2000 sites have been considered and are presented below in Table 4.



3.18 The screening shows that there are no additional impacts to those that were identified in the Appropriate Assessment of the Core Strategy. The sites identified reflect the scale and distribution of develop set out in the Core Strategy and will not increase ether recreational use or urbanisation beyond levels already identified.

**Table 4: Significant effects matrix for the Settlement ID Plans**

Qualifying Features	Key environmental conditions to support site integrity	Comments on nature conservation importance and vulnerability	Possible impacts arising from the Settlement ID Plan	Possible impacts from other plans, trends etc	Is there a significant risk of 'in combination' effects
<b>South West London Waterbodies SPA &amp; RAMSAR</b>					
<p>Comprises a series of reservoirs and former gravel pits that support internationally important numbers of wintering gadwell and northern shoveler (828.14 ha)</p> <p>Also Great crested grebe, great cormorant, Tufted duck, Black-necked grebe, Smew</p>	<ul style="list-style-type: none"> <li>• Lack of disturbance during winter months;</li> <li>• Areas of open water</li> <li>• Areas of shallow water (&lt;300mm) for feeding;</li> <li>• Presence and abundance of aquatic plant and invertebrate food;</li> <li>• Adjacent banks for loafing;</li> <li>• Relevant nearby waterbodies used for feeding and as refuges</li> </ul>	<ul style="list-style-type: none"> <li>• Current research indicates that birds are using a range of waterbodies within the area but outside the SPA boundaries and that these sites are relevant to the integrity of the SPA.</li> </ul>	<p>There are no additional impacts to that identified in the Appropriate Assessment from the Core Strategy. ID Plans will not identify development above levels set out in the Core Strategy.</p>	<p>None</p>	<p>No</p>

Qualifying Features	Key environmental conditions to support site integrity	Comments on nature conservation importance and vulnerability	Possible impacts arising from the Settlement ID Plan	Possible impacts from other plans, trends etc	Is there a significant risk of 'in combination' effects
<b>Thames Basin Heath SPA</b>					
<p>Nationally important breeding populations of nightjar, woodlark and Dartford warbler (8274.72 ha)</p>	<ul style="list-style-type: none"> <li>• Acid soils</li> <li>• Minimal air pollution</li> <li>• Unpolluted water</li> <li>• Unfragmented habitat</li> <li>• Minimal recreational pressure and low incidence of wild fires</li> </ul> <p>Appropriate grazing pressure</p>	<ul style="list-style-type: none"> <li>• Dependent on active management.</li> <li>• Lack of grazing and other traditional management practices pose a threat. Traditional management is being implemented through schemes such as Countryside Stewardship and Wildlife Enhancement Scheme.</li> <li>• Development pressure on neighbouring land and the cumulative and indirect effects of neighbouring developments also pose a potential long-term problem. e.g. housing developments.</li> </ul>	<p>ID Plans will not identify development above levels set out in the Core Strategy and as such there will be no additional impacts. However, it will be necessary to assess the impact of sites within 5km to 7km of the Thames Basin Heaths Special Protection Area where an option for greater than 50 units is taken forward.</p>	<p>Recreational pressure, general urbanisation effects as a result of increased recreational pressure from new development within 5km of SPA.</p>	<p>Yes – this has been subject to an appropriate assessment as part of the HRA for the Core Strategy. An avoidance and mitigation strategy is set out in Policy CS13 and the Thames Basin Heath Mitigation Strategy will support its delivery.</p>

Qualifying Features	Key environmental conditions to support site integrity	Comments on nature conservation importance and vulnerability	Possible impacts arising from the Settlement ID Plan	Possible impacts from other plans, trends etc	Is there a significant risk of 'in combination' effects
		<ul style="list-style-type: none"> <li>• Natural England comment on planning applications and provide input into structural and local plans. A strategic approach to accommodating development whilst ensuring the compatibility with Habitats Regs is being addressed through the Thames Basin Heaths Delivery Project.</li> <li>• Tenure is mixture of public, private, local authorities and non-governmental organisations. MOD and local authorities significant landowners. Local authority land often designated as public open space and used heavily for informal recreation. Private owners - management addressed through Site Management Statement process.</li> </ul>			

Qualifying Features	Key environmental conditions to support site integrity	Comments on nature conservation importance and vulnerability	Possible impacts arising from the Settlement ID Plan	Possible impacts from other plans, trends etc	Is there a significant risk of 'in combination' effects
<b>Thursley, Ash, Pirbright and Chobham SAC</b>					
<p>Important for Northern Atlantic wet heaths with <i>Erica tetralix</i>, European dry heaths and examples of depressions on peat substrates of the <i>Rhynchosporion</i> (5138 ha)</p>	<ul style="list-style-type: none"> <li>• Traditional management, including grazing, bracken control and shrub clearance;</li> <li>• Water quality (there can be problems with diffuse discharges from agricultural fertilisation causing eutrophication);</li> <li>• Water levels</li> <li>• Managed recreational disturbance;</li> <li>• Absence or management of urbanisation effects e.g. fires, fly-tipping, introduction</li> </ul>	<ul style="list-style-type: none"> <li>• Important site for invertebrates.</li> <li>• Mosaic of habitats largely dependent on active heathland management.</li> <li>• Insufficient gazing or other traditional practices, including bracken control and scrub clearance, is a serious potential threat, as is lowering of water tables as a result of abstraction or other</li> </ul>	<p>There are no additional impacts to that identified in the Appropriate Assessment from the Core Strategy. ID Plans will not identify development above levels set out in the Core Strategy.</p>	<p>None</p>	<p>No</p>

Qualifying Features	Key environmental conditions to support site integrity	Comments on nature conservation importance and vulnerability	Possible impacts arising from the Settlement ID Plan	Possible impacts from other plans, trends etc	Is there a significant risk of 'in combination' effects
	<p>of non-native species;</p> <ul style="list-style-type: none"> <li>Minimal atmospheric or direct pollution (nitrogen deposition can affect heathland habitats);</li> </ul>	<p>reasons which could cause loss or damage to wet heath and mire communities.</p> <ul style="list-style-type: none"> <li>Grazing trials have been established on several parts of the site with great success, but currently extensive grazing is absent from much of the site.</li> <li>Indirect effects of neighbouring housing developments pose a potential long-term problem, but can probably be addressed through the planning system.</li> <li>Measures are also needed to address recreational pressures, including disturbance to wildlife and fires resulting from arson, which may pose a serious risk to habitats and some species.</li> <li>MoD major landowner – firing ranges and military exercises. Memorandum of understanding exists between Natural England and MoD through which impacts are regulated. MoD have comprehensive management plans.</li> </ul>			

Qualifying Features	Key environmental conditions to support site integrity	Comments on nature conservation importance and vulnerability	Possible impacts arising from the Settlement ID Plan	Possible impacts from other plans, trends etc	Is there a significant risk of 'in combination' effects
<b>Mole Gap to Reigate Escarpment SAC</b>					
<ul style="list-style-type: none"> <li>• Natural box scrub</li> <li>• Dry grasslands and scrublands on chalk or limestone</li> <li>• Dry grasslands and scrublands on chalk or limestone, including important orchid sites</li> <li>• Yew-dominated woodland</li> <li>• Dry heaths</li> <li>• Beech forests on neutral to rich soils</li> <li>• Great crested newt</li> <li>• Bechstein's bat (887.68 ha)</li> </ul>	<ul style="list-style-type: none"> <li>• Appropriate management: grazing.</li> <li>• Absence of direct fertilization.</li> <li>• Minimal air pollution.</li> <li>• Low recreational pressure.</li> <li>• Absence of urbanization effects, e.g. introduction of invasive non-native species.</li> <li>• Suitable foraging and refuge habitat within 500m of the pond.</li> <li>• Relatively unpolluted water of roughly neutral pH.</li> <li>• Some ponds deep enough to retain water throughout February to August at least one year in every three.</li> <li>• In a wider context, great crested newts require good connectivity of landscape features (ponds, hedges etc) as they often live as a metapopulation.</li> <li>• In a wider context, bats require good connectivity of landscape features to allow foraging and commuting.</li> </ul>	<ul style="list-style-type: none"> <li>• Supports the only area of stable box scrub in the UK (due to natural erosion on steep slope;</li> <li>• Also supports a wide range of calcareous grassland types and is particularly important for orchids including the nationally scarce musk orchid and man orchid;</li> <li>• Also significant in exhibiting transitions to scarce scrub, woodland and dry heath types, notably yew woods and chalk heath.</li> </ul>	There are no additional impacts to that identified in the Appropriate Assessment from the Core Strategy. ID Plans will not identify development above levels set out in the Core Strategy.	None	No

Qualifying Features	Key environmental conditions to support site integrity	Comments on nature conservation importance and vulnerability	Possible impacts arising from the Settlement ID Plan	Possible impacts from other plans, trends etc	Is there a significant risk of 'in combination' effects
<b>Wimbledon Common SAC</b>					
<p>Important for Stag Beetle (<i>Lucanus Cervus</i>). North Atlantic dry wet heaths and European dry heaths (348.31 ha)</p>	<ul style="list-style-type: none"> <li>• Number of old broad-leaved trees and state of decay;</li> <li>• Condition of old broad-leaved trees – state of decay;</li> <li>• Position and degree of exposure of old broad-leaved trees and stumps;</li> <li>• Quantity and size of broad-leaved dead wood;</li> <li>• Condition and position of available dead timber.</li> </ul>	<ul style="list-style-type: none"> <li>• Proximity to urban area means it suffers heavy recreational pressure.</li> <li>• Habitat for Stag Beetle, for which this is only one of 4 known outstanding localities in the UK.</li> <li>• Site of national importance for the conservation of the fauna of invertebrates associated with the decaying timber of ancient trees.</li> </ul>	<p>There are no additional impacts to that identified in the Appropriate Assessment from the Core Strategy. ID Plans will not identify development above levels set out in the Core Strategy.</p>	<p>None</p>	<p>No</p>

Qualifying Features	Key environmental conditions to support site integrity	Comments on nature conservation importance and vulnerability	Possible impacts arising from the Settlement ID Plan	Possible impacts from other plans, trends etc	Is there a significant risk of 'in combination' effects
<b>Richmond Park SAC</b>					
Important for Stag Beetle ( <i>Lucanus Cervus</i> ) (846.68 ha)	<ul style="list-style-type: none"> <li>• Number of old broad-leaved trees and state of decay;</li> <li>• Condition of old broad-leaved trees – state of decay;</li> <li>• Position and degree of exposure of old broad-leaved trees and stumps;</li> <li>• Quantity and size of broad-leaved dead wood;</li> <li>• Condition and position of available dead timber.</li> </ul>	<ul style="list-style-type: none"> <li>• Proximity to urban area means it suffers heavy recreational pressure. However this does not directly affect the European interest feature.</li> <li>• Habitat for Stag Beetle, for which this is only one of 4 known outstanding localities in the UK.</li> </ul>	There are no additional impacts to that identified in the Appropriate Assessment from the Core Strategy. ID Plans will not identify development above levels set out in the Core Strategy.	None	No

Qualifying Features	Key environmental conditions to support site integrity	Comments on nature conservation importance and vulnerability	Possible impacts arising from the Settlement ID Plan	Possible impacts from other plans, trends etc	Is there a significant risk of 'in combination' effects
<b>Windsor Forest and Great Park SAC</b>					
<ul style="list-style-type: none"> <li>• Dry oak-dominated woodland</li> <li>• Beech forests on acid soils</li> <li>• Violet click beetle (1687.26 ha)</li> </ul>	<ul style="list-style-type: none"> <li>• Minimal atmospheric pollution – may increase the susceptibility of beech trees to disease and alter epiphytic (lichen) communities.</li> <li>• Managed public access (site is already heavily accessed).</li> <li>• Appropriate management.</li> </ul>	<ul style="list-style-type: none"> <li>• Site has the largest number of veteran oaks in Britain (and probably in Europe);</li> <li>• Identified as of potential international importance for its saproxylic (deadwood) invertebrate fauna. The site is thought to support the largest of the known populations of the violet click beetle in the UK. The special invertebrate interest is heavily dependent upon a continuous supply of very old decaying trees;</li> <li>• Trees are suffering, perhaps from a combination of drought, higher average temperatures and air quality issues.</li> </ul>	<p>There are no additional impacts to that identified in the Appropriate Assessment from the Core Strategy. ID Plans will not identify development above levels set out in the Core Strategy.</p>	<p>None</p>	<p>No</p>

## **4. Conclusion**

4.1 Settlement ID Plans do not seek to deliver development in a different manner, either in extent or location, to that set out in the Core Strategy. Any development proposed in these plans is therefore in conformity with the Core Strategy and subject to the mitigation required within that Strategy to minimise the impact of development on European sites. In particular any development that is proposed through these plans will be subject to the policy CS13 in the Core Strategy which sets out the Council's approach to addressing the impact on the Thames Basin Heaths SPA.

4.2 However, in addition the Council must assess the potential impact of development over 50 units that falls within five to seven kilometres on the SPA. Two sites have been identified that could potentially meet both of these criteria. Both of these sites will need to be assessed should the proposed allocation be for 50 or more residential units. Any mitigation required would then need to be clearly indicated within the Plan.

4.3 Therefore, in their totality, it is not expected that Settlement ID Plans will have any significant impacts, alone or in combination with other plans, on the integrity of the Natura 2000 sites to that identified in the HRA for the Core Strategy.

**Appendix 1: European sites within 15km of Elmbridge Borough boundary**

