



Planning for Sustainability

Supplementary Planning

Document

Habitat Regulations Assessment Screening

City of London Corporation

Final report

Prepared by LUC

February 2024

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Chapter 1

Introduction

1.1 The City of London Corporation has prepared a Planning for Sustainability Supplementary Planning Document (SPD). LUC has been commissioned by the Council to carry out Habitats Regulations Assessment (HRA) Screening of the SPD on its behalf. The purpose of this screening report is to determine whether the SPD has potential to result in likely significant effects on any European Sites (see Chapter 2).

1.2 A SPD has been prepared by the City of London Corporation, which will be subject to consultation with relevant stakeholders and the public. This report presents a screening assessment of the SPD and should be read in conjunction with that document. If the SPD is subsequently updated, this HRA should be reviewed to determine whether any updates are required in the light of such changes.

Overview of the Planning for Sustainability SPD

1.3 The City of London Corporation has prepared a Planning for Sustainability SPD (November 2023), which relates to the City of London area. The purpose of the SPD is to provide guidance on how applicants should approach sustainability in their developments through the application process. The SPD includes the following aims:

- Sets out the key approaches that the City of London Corporation is targeting on different sustainability themes and outlines key actions to be taken into consideration to develop an exemplar scheme
- Identifies key actions to be considered throughout the design process and provides details specific to the City of London for each sustainability theme

- Provides guidance on what, how and when relevant sustainability aspects should be taken into consideration during the planning application process and sets out submission requirements throughout the life-cycle of the development, from the pre-application process to post completion
- Collates relevant recommended standards, certifications and guidelines.

1.4 The SPD provides additional detail and guidance on how to fulfil the policies in the City of London Local Plan 2015, Local Plan 2021 and the Draft City Plan 2040. Specifically, the additional detail and guidance supports Draft City Plan 2040 policies CE1, S8, DE1, S11, HE1, CR1, DE1, DE8, DE9, S1, HL2, S10, AT1, AT2, S16, S7 and S15; Local Plan 2015 policies CS12, DM12.1, CS15, CS17, DM17.2, CS10 and CS18; and, Local Plan 2021 policies D3, SI2, SI 1, SI 2, SI 3, SI 4, SI 5, SI 6, SI 12, SI 13, D4, SI 7, SI 8, D6, D11 and GG6. The SPD is a material consideration in determining planning applications.

1.5 This SPD is divided into thematic chapters, each with subtopics identified as key sustainability considerations for all development proposals within the City as follows:

- Climate change mitigation and adaptation
- Retrofit and reuse
- Greenhouse gas emissions and energy use
 - Whole Life-Cycle Carbon
 - Operational emissions and energy use
- Circular economy
 - Circular Economy in Construction
 - Operational Circular Economy
- Climate resilience
 - Flood Risk and sustainable urban drainage
 - Water Resource Management
 - Building and Urban Overheating

- Pest & Diseases
- Infrastructure resilience
- Biodiversity
 - Urban greening
 - Urban greening Factor
 - Biodiversity net gain

The requirement to undertake Habitats Regulations Assessment of development plans

1.6 The requirement to undertake HRA of development plans was confirmed by the amendments to the Habitats Regulations published for England and Wales in 2007 [See reference 1]; the currently applicable version is the Habitats Regulations 2017, as amended [See reference 2]. When preparing the development plans, the City of London Corporation is therefore required by law to carry out an HRA. The City of London Corporation can commission consultants to undertake HRA work on its behalf and this (the work documented in this report) is then reported to and considered by the City of London Corporation as the 'competent authority'. The City of London Corporation will consider this work and would usually only progress a Plan if it considers that the Plan will not adversely affect the integrity [See reference 3] of any 'European site', as defined below (the exception to this would be where 'imperative reasons of overriding public interest' can be demonstrated; see paragraph 1.10). The requirement for authorities to comply with the Habitats Regulations when preparing a Plan is also noted in the Government's online Planning Practice Guidance [See reference 4] (PPG).

1.7 HRA refers to the assessment of the potential effects of a development plan on one or more sites afforded the highest level of protection in the UK: SPAs

and SACs. These were classified under European Union (EU) legislation but since 1 January 2021 are protected in the UK by the Habitats Regulations 2017 [\[See reference 5\]](#) (as amended). Although the EU Directives from which the UK's Habitats Regulations originally derived are no longer binding, the Regulations still make reference to the lists of habitats and species that the sites were designated for, which are listed in annexes to the EU Directives:

- SACs are designated for particular habitat types (specified in Annex 1 of the EU Habitats Directive [\[See reference 6\]](#)) and species (Annex II). The listed habitat types and species (excluding birds) are those considered to be most in need of conservation at a European level. Before EU exit day, designation of SACs also had regard to the coherence of the 'Natura 2000' network of European sites. After EU exit day, regard is had to the importance of such sites for the coherence of the UK's 'national site network'.
- SPAs are classified for rare and vulnerable birds (Annex I of the EU Birds Directive [\[See reference 7\]](#)), and for regularly occurring migratory species not listed in Annex I.

1.8 The term 'European sites' was previously commonly used in HRA to refer to 'Natura 2000' sites [\[See reference 8\]](#) and Ramsar sites (international designated under the Ramsar Convention). However, a Government Policy Paper [\[See reference 9\]](#) on changes to the Habitats Regulations 2017 post-Brexit states that:

- Any references to Natura 2000 in the 2017 Regulations and in guidance now refer to the new 'national site network'.
- The national site network includes existing SACs and SPAs; and new SACs and SPAs designated under these Regulations.
- Designated Wetlands of International Importance (known as Ramsar sites) do not form part of the national site network. Many Ramsar sites overlap with SACs and SPAs and may be designated for the same or different species and habitats.

1.9 Although Ramsar sites do not form part of the new national site network, Government guidance [\[See reference 10\]](#) states that:

“Any proposals affecting the following sites would also require an HRA because these are protected by government policy:

- proposed SACs
- potential SPAs
- Ramsar sites - wetlands of international importance (both listed and proposed)
- areas secured as sites compensating for damage to a European site.”

1.10 Furthermore, the NPPF [See reference 11] and practice guidance [See reference 12] currently state that competent authorities responsible for carrying out HRA should treat Ramsar sites in the same way as SACs and SPAs. The legislative requirement for HRA does not apply to other nationally designated wildlife sites such as Sites of Special Scientific Interest or National Nature Reserves.

1.11 For simplicity, this report uses the term 'European site' to refer to all types of designated site for which Government guidance [See reference 13] requires an HRA.

1.12 The overall purpose of an HRA is to conclude whether or not a proposal or policy, or a whole development plan would adversely affect the integrity of the European site in question. This is judged in terms of the implications of the plan for a site's 'qualifying features' (i.e. those Annex I habitats, Annex II species, and Annex I bird populations for which it has been designated). Significantly, HRA is based on the precautionary principle. Where uncertainty or doubt remains, an adverse effect should be assumed.

Stages of HRA

1.13 The HRA of development plans is undertaken in stages (as described below) and should conclude whether or not a proposal would adversely affect the integrity of the European site in question.

1.14 LUC has been commissioned by the City of London Corporation to carry out HRA work on the Council's behalf, and the outputs will be reported to and considered the City of London Corporation, as the competent authority, before adopting the Plan.

1.15 The HRA also requires close working with Natural England as the statutory nature conservation body [See reference 14] in order to obtain the necessary information, agree the process, outcomes and mitigation proposals. The Environment Agency, while not a statutory consultee for the HRA, is also in a strong position to provide advice and information throughout the process as it is required to undertake HRA for its existing licences and future licensing of activities.

Requirements of the Habitats Regulations

1.16 In assessing the effects of a Local Plan in accordance with Regulation 105 of the Conservation of Habitats and Species Regulations 2017 (as amended) (the 'Habitats Regulations'), there are potentially two tests to be applied by the competent authority: a 'Significance Test', followed if necessary by an Appropriate Assessment which would inform the 'Integrity Test'. The relevant sequence of questions is as follows:

- Step 1: Under Reg. 105(1)(b), consider whether the plan is directly connected with or necessary to the management of the sites. If not, proceed to Step 2.

- Step 2: Under Reg. 105(1)(a) consider whether the plan is likely to have a significant effect on a European site, either alone or in combination with other plans or projects (the 'Significance Test'). If yes, proceed to Step 3.

1.17 [Steps 1 and 2 are undertaken as part of Stage 1: HRA Screening.]

- Step 3: Under Reg. 105(1), make an Appropriate Assessment of the implications for the European site in view of its current conservation objectives (the 'Integrity Test'). In so doing, it is mandatory under Reg. 105(2) to consult Natural England, and optional under Reg. 105(3) to take the opinion of the general public.

1.18 [This step is undertaken during Stage 2: Appropriate Assessment.]

- Step 4: In accordance with Reg. 105(4), but subject to Reg. 107, give effect to the land use plan only after having ascertained that the plan would not adversely affect the integrity of a European site.

1.19 [This step follows Stage 2 where a finding of 'no adverse effect' is concluded. If it cannot be it proceeds to Step 5 as part of Stage 3 of the HRA process]

- Step 5: Under Reg. 107, if Step 4 is unable to rule out adverse effects on the integrity of a European site and no alternative solutions exist then the competent authority may nevertheless agree to the plan or project if it must be carried out for 'imperative reasons of overriding public interest' (IROPI).

1.20 [This step is undertaken during Stage 3: Assessment where no alternatives exist and adverse impacts remain taking into account mitigation]

Typical stages

1.21 The stages and associated tasks and outcomes typically involved in carrying out a full HRA of a development plan, based on various guidance

documents are summarised below [See reference 15] [See reference 16] [See reference 17].

Stage 1: HRA Screening

Tasks

- Description of the development plan and confirmation that it is not directly connected with or necessary to the management of European sites.
- Identification of potentially affected European sites and their conservation objectives [See reference 18].
- Assessment of likely significant effects of the development plan alone or in combination with other plans and projects, prior to consideration of avoidance or reduction ('mitigation') measures [See reference 19].

Outcome

- Where effects are unlikely, prepare a 'finding of no significant effect report'.
- Where effects judged likely, or lack of information to prove otherwise, proceed to Stage 2.

Stage 2: Appropriate Assessment (where Stage 1 does not rule out likely significant effects)

Task

- Information gathering (development plan and European sites [See reference 20]).
- Impact prediction.

- Evaluation of development plan impacts in view of conservation objectives of European sites.
- Where impacts are considered to directly or indirectly affect qualifying features of European sites, identify how these effects will be avoided or reduced ('mitigation').

Outcome

- Appropriate Assessment report describing the plan, European site baseline conditions, the adverse effects of the plan on the European site, how these effects will be avoided or reduced, including the mechanisms and timescale for these mitigation measures.
- If effects remain after all alternatives and mitigation measures have been considered proceed to Stage 3.

Stage 3: Assessment where no alternatives exist and adverse impacts remain taking into account mitigation

Task

- Identify and demonstrate 'imperative reasons of overriding public interest' (IROPI).
- Demonstrate no alternatives exist.
- Identify potential compensatory measures.

Outcome

- This stage should be avoided if at all possible. The test of IROPI and the requirements for compensation are extremely onerous.

1.22 It is normally anticipated that an emphasis on Stages 1 and 2 of this process will, through a series of iterations, help ensure that potential adverse effects are identified and eliminated through the inclusion of mitigation measures designed to avoid or reduce effects. The need to consider alternatives could imply more onerous changes to a plan document. It is generally understood that so called ‘imperative reasons of overriding public interest’ (IROPI) are likely to be justified only very occasionally and would involve engagement with the Government.

Case law

1.23 This HRA has been prepared in accordance with relevant case law findings, including most notably the ‘People over Wind’ and ‘Holohan’ rulings from the Court of Justice for the European Union (CJEU).

1.24 The *People over Wind, Peter Sweetman v Coillte Teoranta* (April 2018) judgment ruled that Article 6(3) of the Habitats Directive should be interpreted as meaning that mitigation measures should be assessed as part of an Appropriate Assessment and should not be taken into account at the screening stage. The precise wording of the ruling is as follows:

“Article 6(3)must be interpreted as meaning that, in order to determine whether it is necessary to carry out, subsequently, an appropriate assessment of the implications, for a site concerned, of a plan or project, it is not appropriate, at the screening stage, to take account of measures intended to avoid or reduce the harmful effects of the plan or project on that site.

1.25 In light of the above, the HRA screening stage does not rely upon avoidance or mitigation measures to draw conclusions as to whether the Local Plan could result in likely significant effects on European sites, with any such measures being considered at the Appropriate Assessment stage as relevant.

1.26 This HRA also considers the *Holohan v An Bord Pleanala* (November 2018) judgment which stated that:

Article 6(3) of Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora must be interpreted as meaning that an ‘appropriate assessment’ must, on the one hand, catalogue the entirety of habitat types and species for which a site is protected, and, on the other, identify and examine both the implications of the proposed project for the species present on that site, and for which that site has not been listed, and the implications for habitat types and species to be found outside the boundaries of that site, provided that those implications are liable to affect the conservation objectives of the site.

1.27 In undertaking this HRA, LUC has considered the potential for effects on species and habitats, including those not listed as qualifying features, to result in secondary effects upon the qualifying features of European sites, including the potential for complex interactions and dependencies. In addition, the potential for offsite impacts, such as through impacts to functionally linked land, and or species and habitats located beyond the boundaries of European site, but which may be important in supporting the ecological processes of the qualifying features, has also been considered in this HRA.

1.28 Similarly, effects on both qualifying and supporting habitats and species on functionally linked land (FLL) or habitat have been considered in the HRA, in line with the High Court judgment in *RSPB and others v Secretary of State and London Ashford Airport Ltd* [2014 EWHC 1523 Admin] (paragraph 27), which stated that:

“There is no authority on the significance of the non-statutory status of the FLL. However, the fact that the FLL was not within a protected site does not mean that the effect which a deterioration in its quality or function could have on a protected site is to be ignored. The indirect effect was still

protected. Although the question of its legal status was mooted, I am satisfied ... that while no particular legal status attaches to FLL, the fact that land is functionally linked to protected land means that the indirectly adverse effects on a protected site, produced by effects on FLL, are scrutinised in the same legal framework just as are the direct effects of acts carried out on the protected site itself. That is the only sensible and purposive approach where a species or effect is not confined by a line on a map or boundary fence. This is particularly important where the boundaries of designated sites are drawn tightly as may be the UK practice”.

1.29 In addition to this, the HRA takes into consideration the ‘Wealden’ judgment from the CJEU.

1.30 *Wealden District Council v Secretary of State for Communities and Local Government, Lewes District Council and South Downs National Park Authority* (2017) ruled that it was not appropriate to scope out the need for a detailed assessment for an individual plan or project based on the annual average daily traffic (AADT) figures detailed in the Design Manual for Roads and Bridges or the critical loads used by Defra or Environmental Agency without considering the in-combination impacts with other plans and projects.

1.31 In light of this judgment, the HRA therefore considers traffic growth based on the effects of development from the Local Plan in combination with other drivers of growth such as development proposed in neighbouring districts and demographic change.

1.32 The HRA also takes into account the *Grace and Sweetman* (July 2018) judgment from the CJEU which stated that:

“there is a distinction to be drawn between protective measures forming part of a project and intended avoid or reduce any direct adverse effects that may be caused by the project in order to ensure that the project does

not adversely affect the integrity of the area, which are covered by Article 6(3), and measures which, in accordance with Article 6(4), are aimed at compensating for the negative effects of the project on a protected area and cannot be taken into account in the assessment of the implications of the project”.

"As a general rule, any positive effects of the future creation of a new habitat, which is aimed at compensating for the loss of area and quality of that habitat type in a protected area, are highly difficult to forecast with any degree of certainty or will be visible only in the future”

“A mitigation strategy may only be taken into account at AA (a.6(3)) where the competent authority is “sufficiently certain that a measure will make an effective contribution to avoiding harm, guaranteeing beyond all reasonable doubt that the project will not adversely affect the integrity of the area”

- Otherwise it falls to be considered to be a compensatory measure to be considered under a.6(4) only where there are “imperative reasons of overriding public interest”

1.33 The Appropriate Assessment of the Local Plan therefore only considers the existence of measures to avoid or reduce its direct adverse effects (mitigation) if the expected benefits of those measures are beyond reasonable doubt at the time of the assessment.

Chapter 2

HRA Screening

2.1 This chapter sets out the findings of the screening stage of the HRA.

Identification of European sites

2.2 In order to initiate the search of European sites that could potentially be affected by a development, it is established practice in HRA to consider sites within the area covered by the plan, and other sites that may be affected beyond this area.

2.3 All European sites lying wholly or partly within 15km of the City of London Corporation were included to reflect the fact that development resulting from a plan may affect European sites that are located outside the administrative boundary of the City of London. This distance has generally been considered reasonable by Natural England in other Local and Neighbourhood Plan HRAs to ensure that all designated sites that could potentially be affected by development are identified and included in the assessment. Consideration was given to other pathways by which the SPD could affect sites further than 15k from the City of London, including the consideration of functionally linked habitat, but none were identified. This aligns with the HRA of the Draft City Plan 2040 [See reference 21] which scoped out functionally linked habitats from further assessment.

2.4 No European sites lie within the City of London boundary but four lie wholly or partially within the 15km buffer area:

- Epping Forest SAC (c.8.7km north east);
- Lee Valley SPA and Ramsar Site (c.6.0km north east);
- Richmond Park SAC (c.11.9km south west); and,

- Wimbledon Common SAC (c.10.4km south west).

2.5 Detailed information about each of these European sites is provided in Appendix A, described with reference to Standard Data Forms for the SPAs and SACs, and Natural England's Site Improvement Plans [See reference 22]. Natural England's conservation objectives [See reference 23] for the SPAs and SACs have also been reviewed, as have any Supplementary Advice to those objectives.

Potential likely significant effects of the SPD alone

2.6 This HRA Screening considers the types of effects that could significantly affect European sites and that could arise from development plan documents in general. It then considers whether such effects are likely to arise as a result of the City of London Planning for Sustainability SPD. The potential types of effects considered are set out below, which are drawn from LUC's extensive HRA experience:

- Physical loss or damage to habitat;
- Non-physical disturbance (noise, vibration and light pollution);
- Non-toxic contamination;
- Air pollution;
- Recreation pressure; and
- Changes to water quantity or quality.

2.7 The SPD will not directly result in development; rather it provides additional detail and guidance on how to fulfil the policies in the City of London Local Plan 2015, Local Plan 2021 and the Draft City Plan 2040. The SPD provides guidance on how applicants should approach sustainability in their developments through the application process. This includes:

- Adopting a retrofit first approach;
- Seeking specialist heritage expertise for historic buildings;
- Pursuing best practice in lowest carbon design and construction principles;
- Developing a bespoke, optimised energy strategy for a development;
- Prioritising the objectives of the City of London Local Area Energy Plan;
- Incorporation of recycled materials and support material efficiency;
- Seek coordination opportunities with nearby development sites and public realm works;
- Avoiding urban heat island effects;
- Reducing the risk of local flooding;
- Incorporating water management;
- Adopting a strategic approach to urban greening and biodiversity enhancements;
- Incorporating nature-based solutions; and,
- Balancing amenity requirements with biodiversity benefits.

2.8 These measures are expected to benefit the natural environment and support adaptation to climate change and sustainable development. Therefore, these measures are not expected to result in likely significant effects on any European sites. Furthermore, the SPD provides further detail on how to fulfil policies within the Local Plan 2015, Local Plan 2021 and the Draft City Plan 2040. An HRA Report [See reference 24] was produced in January 2024 which considers the likely significant effects of the Draft Local Plan 2040. The HRA Screening Report identified potential likely significant effects in relation to air pollution, direct pollution into the River Thames, wastewater treatment into the River Thames and water abstraction. These impacts may arise as a result of Draft Local Plan 2040 Policy S1: Healthy and Inclusive City which the SPD provides further guidance for. However, the Appropriate Assessment concluded that mitigation set out in other Local Plan policies, along with regulatory safeguards, are sufficient to avoid adverse effects on the integrity of European

sites. None of the other policies within the Draft Local Plan 2040 that could result in likely significant effects relate to this SPD.

Potential likely significant effects of the SPD in-combination with other plans and programmes

2.9 Given that no pathway has been identified by which the SPD could result in likely significant effects on any European site, there is no pathway by which in-combination effects could occur. As such, the SPD is not expected to result in likely significant effects on any European site in combination with any other plans or programmes.

Chapter 3

Conclusions

3.1 This HRA Screening has determined that the Planning for Sustainability SPD will not result in likely significant effects on any European site, either alone or in combination with any other plans or programmes. This is because the SPD will not result in development and instead seeks to minimise the potential negative environmental impacts of development and to maximise positive environmental impacts.

Next steps

3.2 This HRA Screening Report will be subject to consultation with Natural England. Once any consultation responses are received, this document will be revised and updated if necessary.

LUC

February 2024

Appendix A

Attributes of European Sites

A.1 This appendix contains information about the European sites considered in this HRA.

Epping Forest SAC

Area (ha):

- 1,630.74

Qualifying features

Annex 1 Habitats (which are a primary reason for the selection of this site):

- Atlantic acidophilous beech forests with *Ilex* and sometimes also *Taxus* in the shrublayer (*Quercion robori-petraeae* or *Ilici-Fagenion*).

Annex 1 Habitats (which are present as a qualifying feature but not a primary reason for the selection of this site):

- European dry heaths
- North Atlantic wet heaths with *Erica tetralix* (wet heathland with cross-leaved heath).

Annex II species (that are a primary reason for the selection of this site):

- Stag beetle *Lucanus cervus*

Conservation objectives

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats and habitats of qualifying species
- The structure and function (including typical species) of qualifying natural habitats
- The structure and function of the habitats of qualifying species
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely
- The populations of qualifying species, and,
- The distribution of qualifying species within the site.

Current pressures or threats

Threats and pressures on this site include the following:

- Air Pollution: impact of atmospheric nitrogen deposition - Nitrogen deposition exceeds site-relevant critical loads for ecosystem protection. Some parts of the site are assessed as in unfavourable condition for reasons linked to air pollution impacts.
- Undergrazing - The quality and diversity of the SAC features requires targeted management best achieved through grazing to: minimise scrub invasion; minimise robust grass domination, and maximise the species diversity of heathland plant communities.
- Public Access / Disturbance - Epping Forest is subject to high recreation pressure.

Appendix A Attributes of European Sites

- Changes in species distributions - Beech tree health and recruitment may not be coping sufficiently with environmental conditions to sustain its presence and representation within the SAC feature. This may be linked to climate change as well as other factors such as air quality, recreation pressure and water availability.
- Inappropriate water levels - Wet heath is dependent on suitable ground water levels. There is a threat of prolonged drying out through climate change.
- Water pollution - Surface run-off of poor quality water from roads with elevated levels of pollutants, nutrients and salinity may be affecting wet heath, probably mostly around the edges.
- Invasive species - Heather beetle has locally impacted on some heathland areas. Grey squirrel is not currently known to be significantly affecting tree health or regeneration but this will need to be monitored.
- Disease - Tree diseases such as Phytophthora present a real threat to Beech.
- In addition to the above, the supplementary advice^{40F} identifies the following vulnerabilities:
- Adaptation and resilience of the feature – the vulnerability of Epping Forest SAC to climate change has been assessed by Natural England as being Medium taking into account the sensitivity, fragmentation, topography and management of its habitats.
- Functional connectivity with wider landscape- The heathland resource is extensive in county terms but is fragmented, mainly by closed tree canopy habitat and roads. It is therefore vulnerable to encroachment, boundary effects, pollution, recreational impact and hydrological changes.
- Vegetation structure - Variations in the structure of the heathland vegetation (vegetation height, amount of canopy closure, and patch structure) is needed to maintain high niche diversity and hence high species richness of characteristic heathland plants and animals. There is currently low cover (<25%) of dwarf shrubs present for the feature and less than 15% of scrub and tree cover.

Appendix A Attributes of European Sites

- Soils - the soils of the wet heath habitat are vulnerable to, and have been exposed to acidification, nutrient enrichment and pollution due to their fragmentation and proximity to roads and urban/residential development.
- Illumination - Epping Forest is fragmented by roads and largely surrounded by urban development and residential areas. Opportunities should be sought to minimise and reduce light pollution from existing development and any development plans or projects to ensure SAC features and significant biodiversity assets are safeguarded.

Non-qualifying habitats and species upon which the qualifying habitats and/or species depend

Stag beetles require decaying wood of broadleaved trees for larvae to feed, although not of a particular tree species. The supplementary advice on conserving and restoring site features states that off-site trees in local gardens, parks and along the roadside may be important in helping to maintain the local stag beetle population if decaying timber is present and may help to 'connect' the SAC population with neighbouring colonies.

The supplementary advice also states:

- The qualifying habitat comprises beech *Fagus sylvatica* forests with holly *Ilex aquifolium*, growing on acid soils, in a humid Atlantic climate. Sites of this habitat type often are, or were, managed as wood-pasture systems, in which pollarding of beech *Fagus sylvatica* and oak *Quercus* spp. was common.
- Wet heath usually occurs on acidic, nutrient-poor substrates, such as shallow peats or sandy soils with impeded drainage.
- European dry heaths typically occur on freely-draining, acidic to circumneutral soils with generally low nutrient content. Nearly all dry heath is seminatural, being derived from woodland through a long history of grazing and burning. Most dry heaths are managed as extensive grazing for livestock.

Appendix A Attributes of European Sites

- Some plant or animal species (or related groups of such species) make a particularly important contribution to the necessary structure, function and/or quality of qualifying habitats. For wet heath, this includes: *Calluna vulgaris*, *Erica cinerea*, *E. tetralix*, *Salix repens*, *Ulex minor*, *Vaccinium spp.* *Carex panicea*, *C. pulicaris*, *Dactylorhiza maculata*, *Eleocharis spp.*, *Eriophorum angustifolium*, *Juncus acutiflorus*, *J. articulatus*, *Molinia caerulea*, *Anagallis tenella*, *Drosera spp.*, *Galium saxatile*, *Genista anglica*, *Polygala serpyllifolia*, *Potentilla erecta*, *Succisa pratensis*. *Pedicularis sylvatica*. For dry heath, this includes: *Calluna vulgaris*, *Erica cinerea*, *E. tetralix*, *Ulex minor*, *Vaccinium spp.* *Genista anglica*, *Agrostis spp.*, *Carex spp.*, *Danthonia decumbens*, *Deschampsia flexuosa*, *Festuca spp.*, *Molinia caerulea*, *Nardus stricta*, *Galium saxatile*, *Hypochaeris radicata*, *Lotus corniculatus*, *Pedicularis sylvatica*, *Plantago lanceolata*, *Polygala spp.* *Potentilla erecta*, *Rumex acetosella*, *Succisa pratensis*, *Scilla verna*, *Serratula tinctoria*, *Teucrium scorodonia* *Thymus praecox*, *Viola riviniana*.
- There are many plants and animals which use or co-exist with non-native trees, but many rare and threatened woodland species are specialists adapted to one or a few native trees or shrub species (birches, willows and oaks, are examples of trees that host many specialist insect species). At this SAC, site-native species of tree and shrub include those typical of the H9120 type including Beech *Fagus sylvatica*, Oak *Quercus robur* and *Quercus petraea*, Holly *Ilex aquifolium*, Bramble *Rubus fruticosus* agg. Honeysuckle *Lonicera periclymenum*, Hornbeam *Carpinus betulus*, Silver birch *Betula pendula*, Downy birch *Betula pubescens*, Yew *Taxus baccata*, Elder *Sambucus nigra*, Goat willow *Salix caprea* and Wild Cherry *Prunus avium*. In addition to this, the characteristic mosaics and transitions of ancient forests and wood-pasture-types are well-represented within the site and are necessary for the conservation of SAC features and site integrity.
- Key species of ground flora, epiphytic bryophytes, mosses, liverworts and lichens are also listed.

Lee Valley SPA and Ramsar Site

Area (ha)

- 447.87

Qualifying features

SPA:

Annex 1 species (non – breeding):

- Great bittern *Botaurus stellaris*

Annex 1 (migratory species, non - breeding):

- Northern shoveler *Anas clypeata*
- Gadwall *Anas strepera*

Non Qualifying Species of Interest:

- Cormorant *Phalacrocorax carbo*
- Great Crested Grebe *Podiceps cristatus*
- Tufted Duck *Aythya fuligula*
- Pochard *Aythya ferina*
- Grey Heron *Ardea cinerea*

Ramsar:

The site supports the nationally scarce plant species whorled watermilfoil *Myriophyllum verticillatum* and the rare or vulnerable invertebrate *Micronecta minutissima* (a waterboatman).

Over winter the area regularly supports:

- Gadwell, *Anas strepera* – 456 individuals, representing an average of 1.5% of the population
- Shoveler, *Anas clypeata* – 406 individuals, representing an average of 1% of the population

Conservation Objectives

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

- The extent and distribution of the habitats of the qualifying features
- The structure and function of the habitats of the qualifying features
- The supporting processes on which the habitats of the qualifying features rely
- The population of each of the qualifying features, and,
- The distribution of the qualifying features within the site.

Current pressures or threats

Threats and pressures on this site include the following:

Appendix A Attributes of European Sites

- Water Pollution - The vegetation and invertebrates provide food for the ducks, while fish provide food for the bitterns; and the habitat mosaic needs to vary from clear open water with abundant aquatic vegetation to moderately eutrophic conditions. Changes in water quality need to be managed to prevent loss of suitable habitat and food sources.
- Hydrological changes - Reservoir levels linked to operational requirements and all water bodies subject to natural fluctuations accounting for abstraction and climatic change.
- Public Access/Disturbance - Areas of the SPA are subject to a range of recreation pressures including watersports, angling and dog walking. This has the potential to affect SPA populations directly or indirectly.
- Inappropriate scrub control - The reedbed habitats, muddy fringes, and bankside all provide habitat as part of the mosaic for the SPA birds. Scrub control is necessary to ensure these habitats are maintained.
- Fisheries: Fish stocking - Fish population and species composition needs to be appropriate to ensure suitable habitats including food resource and water quality are maintained for SPA bird species.
- Invasive species - Azolla and/or invasive aquatic blanket weeds will adversely affect aquatic habitat (food sources).
- Inappropriate cutting/mowing - The reedbed requires rotational management for bittern.
- Air Pollution: risk of atmospheric nitrogen deposition - Nitrogen deposition exceeds site relevant critical loads.

The Information Sheet on Ramsar Wetlands also notes the whole site supports high levels of visitor pressure; principally for purposes of angling, walking, cycling and birdwatching; with boating on the adjacent canal. These activities are mostly well regulated and at current levels are not considered to threaten the interest of the Ramsar site (although they may reduce the potential for enhancing the interest). In addition to the above, the supplementary advice identifies the following vulnerabilities:

Appendix A Attributes of European Sites

- Conservation measures - Active and ongoing conservation management is often needed to protect, maintain or restore *Botaurus stellaris* Great bittern (non-breeding) at this site.
- Vegetation characteristics - Many bird species will have specific requirements that conservation measures will aim to maintain, for others such requirements will be less clear. Activities that may directly or indirectly affect the vegetation of supporting habitats and modify these characteristics may adversely affect the feature.
- Connectivity with supporting habitats - Bitterns clearly move between sites within the Lee Valley and to do this they will need to move safely to and from supporting habitat between individual waterbodies and above/across land outside the SPA. Also, the ability of Northern Shoveler to safely and successfully move to and from feeding and roosting areas is critical to their adult fitness and survival.
- Water depth - As the birds will rely on detecting their prey within the water to hunt, the depth of water at critical times of year may be paramount for successful feeding and therefore their fitness and survival.
- Population abundance – the population of Northern Shoveler within Lee Valley SPA has shown a slight decrease since Classification. The key SPA sites at Amwell and Turnford & Cheshunt Pits experienced a population decline during the 1999/00 – 2008/09 period, along with the functionally linked non- SPA Holyfield gravel pits. The SPA Walthamstow reservoirs and non-SPA Chingford reservoirs show population trends that appear to be related to water levels and available food resource.
- Food availability within supporting habitat - the availability of an abundant food supply is critically important for successful breeding, adult fitness and survival and the overall sustainability of the population. As a result, inappropriate management and direct or indirect impacts which may affect the distribution, abundance and availability of prey may adversely affect the population.

Non-qualifying habitats and species upon which the qualifying habitats and/or species depend

The information below is drawn from the supplementary advice on conserving and restoring site features.

■ Great bittern

- Standing open water and canals - bittern rely on the presence and continuity of open water habitat. Changes in water area, and associated marginal habitat, can adversely affect the suitability of supporting open water habitat.
- Reedbeds.
- Open terrain – bittern favour large areas of open terrain, largely free of obstructions, in and around its nesting, roosting and feeding areas. Often there is a need to maintain an unobstructed line of sight within nesting, feeding or roosting habitat to detect approaching predators, or to ensure visibility of displaying behaviour.
- Key prey species include eel, rudd, roach, frogs, toads and invertebrates.

Within the SPA/Ramsar, the majority of bittern are found in the Turnford and Cheshunt Pits site while Amwell Quarry and Rye Meads also support the species. Walthamstow Reservoirs also occasionally supports bittern.

■ Gadwall

- Standing open water - gadwall favour gravel pits and reservoirs during the winter period where they feed on seeds, leaves and stems of water plants.
- Preferred food plants – sweet-grass (*Glyceria fluitans*), creeping bent (*Arostis stolonifera*), stoneworts (*Chara*), pondweeds (*Potomageton*, *Ceratophyllum* spp., *Ruppia*, *Elodeo nuttallii*).

Appendix A Attributes of European Sites

Each of the SPA/Ramsar's component SSSIs support gadwall in numbers which are sufficient to qualify them as being of national importance.

- Northern shoveler
 - Standing open water - in winter, shoveler frequent shallow water areas on marshes, flooded pasture, reservoirs and lakes with plentiful, marginal reeds or emergent vegetation and are found throughout.
 - Preferred food plants – *Scirpus*, *Eleocharis*, *Carex*, *Potamogeton*, *Glyceria*. Shoveler also feed on zooplankton (e.g. *Hydrobia*, crustaceans, caddisflies, Diptera, beetles) in the shallow margins of waterbodies. Preferred food plants are linked with early successional stages of waterbodies, therefore succession, particularly tree cover, can lead to the loss of suitable foraging habitat.

The British Trust for Ornithology records the site's qualifying bird species' diets as:

- Bittern: mostly fish, amphibians, insects but wide variety;
- Shoveler: omnivorous (incl. insects, crustaceans, molluscs, seeds); and
- Gadwall: leaves and shoots.

The Information Sheet on Ramsar Wetlands also notes the ecological features of the site include open water, with associated wetland habitats including reedbeds, fen grassland and woodland which support a number of wetland plant and animal species including internationally important numbers of wintering wildfowl.

Richmond Park SAC

Area (ha):

- 846.68

Qualifying features

Richmond Park has a large number of ancient trees with decaying timber. It is at the heart of the south London centre of distribution for stag beetle *Lucanus cervus*, and is a Site of national importance for the conservation of the fauna of invertebrates associated with the decaying timber of ancient trees.

Annex II species that are a primary reason for selection of this Site:

- Stag beetle *Lucanus cervus*

Conservation Objectives

Ensure that the integrity of the Site is maintained or restored as appropriate, and ensure that the Site contributes to achieving the Favourable Conservation Status of Stag beetle, by maintaining or restoring:

- The extent and distribution of the habitats of qualifying species.
- The structure and function of the habitats of qualifying species.
- The supporting processes on which the habitats of qualifying species rely.
- The populations of qualifying species, and,
- The distribution of qualifying species within the Site.

Current pressures or threats

No current issues affecting the Natura 2000 feature have been identified. Despite this, the Richmond Park Management Plan should continue to be periodically reviewed to ensure the continuing availability of decaying wood habitat.

Non-qualifying habitats and species upon which the qualifying habitats and/or species depend

Stag beetle *Lucanus cervus*

■ Supporting habitats

- Decaying-wood habitat: Maintain an abundance and constant supply of ancient trees, standing dead trees, fallen trees, stumps and roots in a state of decay. In urban areas ensure larger native trees and man-made timber structures persist as a larval resource.
- Woodland habitat structure: Maintain a well-structured broadleaved woodland habitat, with sheltered, sunlit glades and rides containing stumps and other suitable decaying wood.

■ Supporting Processes

- Natural processes: Ensure the continuity of timber decay and nutrient recycling processes, in particular the continued provision of plentiful decaying stumps and roots.
- Conservation measures: Maintain the management measures (either within and/or outside the Site boundary as appropriate) which are necessary to maintain or restore the structure, functions and supporting processes associated with the stag beetle feature and/or its supporting habitats.

Wimbledon Common SAC

Area (ha)

- 348.31

Qualifying features

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 *Lucanus cervus*. The Site supports a number of other scarce invertebrate species associated with decaying timber.

Annex I habitats present as a qualifying feature, but not a primary reason for selection of this Site

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

Annex II species that are a primary reason for selection of this Site:

- Stag beetle *Lucanus cervus*

Conservation Objectives

Ensure that the integrity of the Site is maintained or restored as appropriate, and ensure that the Site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring:

- The extent and distribution of qualifying natural habitats (Northern Atlantic wet heaths with *Erica tetralix* & European dry heaths) and habitats of qualifying species (Stag beetle).
- The structure and function (including typical species) of qualifying natural habitats.
- The structure and function of the habitats of qualifying species.
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely.
- The populations of qualifying species, and

- The distribution of qualifying species within the Site.

Current pressures or threats

The Site is located in an urban area and therefore experiences air pollution and heavy recreational pressure. According to Natural England's Site Improvement Plans, measures should be implemented by Natural England to establish a Site Nitrogen Action Plan. Furthermore, Natural England and Wimbledon and Putney Common Conservators should implement measures to reduce visitor impact. Issues associated with habitat fragmentation and invasive species have also been identified. The Species Recovery Programme should address this, while an invasives response plan should be developed.

Non-qualifying habitats and species upon which the qualifying habitats and/or species depend

For Stag beetle see Richmond Park Special Area of Conservation above.

H4030 European Dry Heaths Supporting habitats

- Vegetation Composition
 - Bracken cover: Maintain or restore a cover of dense bracken which is low, typically at <5%, across the H4030 feature.
 - Vegetation community composition: Ensure the component vegetation communities of the H4030 feature are referable to and characterised by the following National Vegetation Classification type(s):
 - H1 *Calluna vulgaris* – *Festuca ovina* Heathland;
 - H2 *Calluna vulgaris* – *Ulex minor* heath (and as mosaics with acid grassland vegetation).

Appendix A Attributes of European Sites

- Vegetation community transitions: Maintain or restore any areas of transition between the H4030 feature and other heathland associated habitats, such as humid heath, mires, acid grassland, scrub and woodland.
- Key structural, influential and distinctive species: Maintain or restore the abundance of the species listed below to enable each of them to be a viable component of the Annex 1 habitat: Heather *Calluna vulgaris*, Bell heather *Erica cinerea*, dwarf gorse *Ulex minor*, pill sedge *Carex pilulifera*, heath bedstraw *Galium saxatile*, petty whin *Genista anglica*, Hypochaeris *radicata*, tormentil *Potentilla erecta*, sheep's sorrel *Rumex acetosella*, Mosses *Hypnum jutlandicum*, *Dicranum scoparium*, *Polytrichum juniperinum*.
- Vegetation Structure
 - Cover of gorse: Maintain or restore a cover of common gorse *Ulex europaeus* at <1-5% and a combined cover of *U. europaeus* and dwarf gorse *U. minor* at <20%, across the H4030 feature.
 - Tree and scrub cover: Maintain or restore the open character of the H4030 feature, with a typically scattered and low cover of trees and scrub <10% cover (excluding common gorse).
 - Heather age structure: Maintain or restore a diverse age structure amongst the ericaceous shrubs typically found as part of the H4030 feature.
 - Cover of dwarf shrubs: Maintain or restore an overall cover of dwarf shrub species which is typically between 75- 90% of the H4030 feature.
- Extent and Distribution
 - Extent of the feature within the Site: Restore the combined total extent of the H4030 and H4010 feature to 48.6 hectares, including its component habitat types and transitions to adjacent habitats.
 - Spatial distribution within the Site: Maintain or restore the distribution and configuration of the H4030 feature, including where applicable its component vegetation types, across the Site.
- Structure and Function

Appendix A Attributes of European Sites

- Vegetation: undesirable species. Maintain or restore the frequency/cover of the following undesirable species to within acceptable levels and prevent changes to surface condition, soils, nutrient levels or hydrology which may encourage their spread: *Acaena* spp., *Rhododendron ponticum*, *Gaultheria shallon*, *Fallopia japonica*, *Cirsium arvense*, *Digitalis purpurea*, *Epilobium* spp. (excl. *E. palustre*), *Ranunculus repens*, *Senecio jacobaea*, *Rumex obtusifolius*, *Urtica dioica*.
- Functional connectivity with the wider landscape: Maintain or restore the overall extent, quality and function of any supporting features within the local landscape which provide a critical functional connection with the Site.
- Adaptation and resilience: Maintain or restore the H4030 feature's ability, and that of its supporting processes, to adapt or evolve to wider environmental change, either within or external to the Site.
- Soils, substrate and nutrient cycling: Maintain or restore the properties of the underlying soil types, including structure, bulk density, total carbon, pH, soil nutrient status and fungal/bacterial ratio, to within typical values for the H4030 feature.
- Supporting Processes
 - Conservation measures: Maintain or restore the management measures (either within and/or outside the Site boundary as appropriate) which are necessary to maintain or restore the structure, functions and supporting processes associated with the H4030 feature.
 - Air quality: Restore the concentrations and deposition of air pollutants to at or below the Site-relevant Critical Load or Level values given for this feature of the Site on the Air Pollution Information System.

H4010 Northern Atlantic Wet Heaths with *Erica tetralix*

- Extent and Distribution
 - Extent of the feature within the Site: Restore the total extent of the H4010 and H4030 features to 48.6 hectares.

Appendix A Attributes of European Sites

- Spatial distribution of the feature within the Site: Maintain the distribution and configuration of the H4010 feature, including where applicable its component vegetation types, across the Site.
- Structure and Function (including its typical species)
 - Vegetation community transitions: Maintain or restore any areas of transition between this and communities which form other heathland-associated habitats, such as dry and humid heaths, mires, acid grasslands, scrub and woodland.
 - Vegetation community composition: Ensure the component vegetation communities of the H4010 feature are referable to and characterised by the following National Vegetation Classification type (s):
 - M16 *Erica tetralix* – Sphagnum compactum heathland
 - Mosaics with M25 *Molinia caerulea* – *Potentilla erecta* mire.
 - Vegetation structure: cover of dwarf shrubs. Maintain an overall cover of dwarf shrub species which is typically between 75-90%.
 - Vegetation structure: heather age structure. Maintain a diverse age structure amongst the ericaceous shrubs typically found on the Site.
 - Vegetation structure: cover of gorse: Maintain cover of common gorse at <10%.
 - Vegetation structure: tree and shrub cover. Maintain the open character of the H4010 feature, with a typically scattered and low cover of trees and scrub (<10% cover).
 - Vegetation composition: bracken cover. Restore a cover of dense bracken which is low, typically at <5%.
 - Key structural, influential and Site distinctive species: Restore the abundance of the species listed below to enable each of them to be a viable component of the H4010 Annex 1 habitat: *Calluna vulgaris*, *Erica tetralix*, *Myrica gale*, *Salix repens*, *Ulex minor*, *Eleocharis spp.*, *Eriophorum angustifolium*, *Molinia caerulea*, *Trichophorum cespitosum*, *Anagallis tenella*, *Drosera spp.*, *Narthecium ossifragum*.

Appendix A Attributes of European Sites

- Vegetation: undesirable species. Restore the frequency/cover of the following undesirable species to within acceptable levels and prevent changes in surface condition, soils, nutrient levels or hydrology which may encourage their spread: *Acaena* spp., *Rhododendron ponticum*, *Gaultheria shallon*, *Fallopia japonica*, *Cirsium arvense*, *Digitalis purpurea*, *Epilobium* spp. (excl. *E. palustre*), *Ranunculus repens*, *Senecio jacobaea*, *Rumex obtusifolius*, *Urtica dioica*.
- Functional connectivity with the wider landscape: Maintain the overall extent, quality and function of any supporting features within the local landscape which provide a critical functional connection with the Site.
- Adaptation and resilience: Maintain or restore the H4010 feature's ability, and that of its supporting processes, to adapt or evolve to wider environmental change, either within or external to the Site.
- Supporting Processes
 - Conservation measures: Maintain the management measures (either within and/or outside the Site boundary as appropriate) which are necessary to maintain or restore the structure, functions and supporting processes associated with the H4010 feature.
 - Soils, substrate and nutrient cycling: Maintain the properties of the underlying soil types, including structure, bulk density, total carbon, pH, soil nutrient status and fungal:bacterial ratio, at within typical values for the H4010 habitat.
 - Air quality: Restore the concentrations and deposition of air pollutants to at or below the Site-relevant Critical Load or Level values given for the H4010 feature of the Site on the Air Pollution Information System.
 - Hydrology: At a Site, unit and/or catchment level as necessary, maintain or restore the natural hydrological regime to provide the conditions necessary to sustain the H4010 feature within the Site.

References

- 1 The Conservation (Natural Habitats, &c.) (Amendment) Regulations 2007 (2007) SI No. 2007/1843. TSO (The Stationery Office), London.
- 2 The Conservation of Habitats and Species Regulations 2017 (2017) SI No. 2017/1012, as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (SI 2019/579).
- 3 The integrity of a site is the coherence of its ecological structure and function, across its whole area, that enables it to sustain the habitat, complex of habitats and/or the levels of populations of the species for which it was designated. (Source: UK Government Planning Practice Guidance)
- 4 Appropriate assessment. GOV.UK. Available at: <https://www.gov.uk/guidance/appropriate-assessment>
- 5 The Conservation of Habitats and Species Regulations 2017 (2017) SI No. 2017/1012, as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (SI 2019/579).
- 6 Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora (the 'Habitats Directive')
- 7 Directive 2009/147/EC of 30 November 2009 on the conservation of wild birds (the 'Birds Directive')
- 8 The network of protected areas identified by the EU. Available at: https://ec.europa.eu/environment/nature/natura2000/index_en.htm
- 9 Changes to the Habitats Regulations (2017) GOV.UK. Available at: <https://www.gov.uk/government/publications/changes-to-the-habitats-regulations-2017/changes-to-the-habitats-regulations-2017>
- 10 Defra and Natural England (2021) Guidance - Habitats regulations assessments: protecting a European site. Available at: <https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site>
- 11 Department for Levelling Up, H. and C. (2023) National Planning Policy Framework Paragraph 187, GOV.UK. Available at:

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- <https://www.gov.uk/government/publications/national-planning-policy-framework--2>
- 12** The HRA Handbook, Section A3. David Tyldesley & Associates, a subscription based online guidance document. Available at: <https://www.dtapublications.co.uk/handbook/European>
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 - 14** Regulation 5 of the Habitats Regulations 2017
 - 15** UK Government Planning Practice Guidance. Available at: <https://www.gov.uk/guidance/appropriate-assessment>
 - 16** European Commission (2001) Assessment of plans and projects significantly affecting European Sites. Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC.
 - 17** The HRA Handbook. David Tyldesley & Associates, a subscription based online guidance document. Available at: <https://www.dtapublications.co.uk/handbook/European>
 - 18** Conservation objectives are published by Natural England for SACs and SPAs. Available at: <http://publications.naturalengland.org.uk/category/6490068894089216>
 - 19** In line with the CJEU judgment in Case C-323/17 People Over Wind v Coillte Teoranta, mitigation must only be taken into consideration at this stage and not during Stage 1: HRA Screening.
 - 20** In addition to European site citations and conservation objectives, key information sources for understanding factors contributing to the integrity of European sites include (where available) conservation objectives supplementary advice and Site Improvement Plans prepared by Natural England. Available at: <http://publications.naturalengland.org.uk/category/5458594975711232>
 - 21** HRA of the City of London Local Plan: Revised Proposed Submission Draft (January 2024). Available at:

References

- <https://www.cityoflondon.gov.uk/assets/Services-Environment/habitat-regulations-assessment-city-plan-2040.pdf>
- 22** Obtained from the Natural England website. Available at:
<http://www.naturalengland.org.uk/>
- 23** Natural England (undated) Conservation Objectives for European Sites. Available at:
<http://publications.naturalengland.org.uk/category/6490068894089216>
- 24** HRA of the City of London Local Plan: Revised Proposed Submission Draft (January 2024). Available at:
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