

Habitats Regulation Screening Assessment For Barnet Draft Local Plan

Update July 2022

Introduction

1. This report provides information in support of the Habitats Regulations Assessment (HRA) screening of the submission London Borough of Barnet Local Plan.
2. The purpose of the HRA Screening stage is to determine whether any of the policies being considered for the Local Plan are likely to have a significant effect on a Designated Site either alone or in combination with other plans.
3. The HRA screening report will also establish whether a full Appropriate Assessment under the Habitats Regulations is required, where the potential for likely significant effects cannot be excluded.
4. The HRA and Integrated Impact Assessment (IIA) are parallel processes. Information informing the baseline data for the IIA process informs the HRA. However, the assessments are conducted separately as the assessment processes have different aims, emphasis and levels of detail.
5. A screening report was prepared for the emerging Barnet Local Plan which is included as part of the supporting evidence within the Integrated Impact Assessment (IIA). Following the submission of the Barnet Local Plan to the Planning Inspectorate, the HRA Screening assessment report has been updated to ensure that the document explicitly accords with case law and is based on the most up-to-date information relating to the designated site network, plans and strategy document.
6. This updated May 2022 HRA screening assessment has been prepared in accordance with relevant case law findings, including most notably
 - People Over Wind and Peter Sweetman v Coillte¹
 - Holohan v. An Bord Pleanála.²
7. It therefore does not consider mitigation and acknowledges the complex relationship between qualifying and non-qualifying features on the designated site network. However, the overarching conclusions within the HRA screening opinion have not changed.

¹ <http://curia.europa.eu/juris/document/document.jsf?text=&docid=200970&pageIndex=0&doclang=en&mode=req&dir=&occ=first&part=1&cid=619449>

² <https://ie.vlex.com/vid/holohan-v-an-bord-793932545>

The requirement to undertake Habitats Regulations Assessment of development plans

8. The requirement to undertake HRA of development plans is outlined in the Conservation of Habitats and Species Regulations 2017 ('the Habitats Regulations') which transpose the European Habitats Directive 92/43/EEC into English law. The regulations were updated by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019³, transferring functions from the European Commission to the appropriate authorities in England and Wales.
9. In accordance with the Habitats Regulations, the London Borough of Barnet is legally required to carry out an appropriate assessment on any new plans or projects that may be capable of affecting the integrity of any designated site (formally European site) either alone or in combination with other plans and projects.
10. The updated regulations provide for the legal protection of habitats and species and a network of protected sites, formally referred to as European Sites and the Natura 2000 network. The network is safeguarded against potentially damaging developments and comprises of the following sites:
 - Special Areas of Conservation (SACs) - SACs target particular habitat types
 - Special Protection Areas (SPAs) – SPAs protect birds, designated under the Conservation of Wild Birds Directive (79/409/EEC)
 - Ramsar Site – designated under the International Convention on Wetlands of International Importance to protect wetlands.
11. Ramsar sites are not included within the definition of sites that were formally European sites, but are protected through International Convention. For ease of reference all sites, including Ramsar sites, are referred to in this report as 'designated sites' or 'sites within the designated network'.

³ [The Conservation of Habitats and Species \(Amendment\) \(EU Exit\) Regulations 2019 \(https://www.legislation.gov.uk/ukdsi/2019/9780111176573\)](https://www.legislation.gov.uk/ukdsi/2019/9780111176573)

HRA Screening Methodology

Stages of the HRA

12. The current European Commission (EC) guidance suggests a four stage process for HRA as shown in table 1, although all stages are not always necessary. Other guidance used to inform this assessment is outlined in Appendix 1. The HRA should conclude whether or not a proposal and/or policy would adversely affect the integrity of the nationally designated site in question.
13. Under Regulation 5 of the Habitats Regulation, the HRA requires engagement with Natural England as the statutory nature conservation body in order to agree the process, outcomes and mitigation proposals, if proposed. Natural England were consulted through the production of the original IIA, and again in terms of this updated screening opinion. A copy of their correspondence is included as Appendix 5 to this report.

Table 1: Stages of HRA

Stage	Task
<p>Stage 1: Screening - The Screening Assessment for the draft Local Plan will determine if the document is likely to have any significant effects on the conservation objectives of designated sites (this will also consider the cumulative effects) or an adverse impact on the integrity of the site. The assessment will determine whether the next stages of the Habitats Regulations Assessment will be necessary.</p>	<ul style="list-style-type: none"> • Identification of Designated Sites that could be potentially affected (including sites outside of the London Borough of Barnet). • A review of each site including site description, qualifying features, conservation objectives, current pressures and threats and condition of sites. • A screening of the policies contained within the draft Local Plan which have the potential to affect Designated Sites, and whether the sites are vulnerable to these effects. • An assessment of any impacts in combination with other plans and projects.
<p>Stage 2: Appropriate Assessment - Where there are likely significant effects, or effects are uncertain, then an ‘appropriate assessment’ is required. This stage considers the impacts of the plan or project on the integrity of the relevant Designated sites, either alone or ‘in combination’ with other projects or plans, and with respect to the sites’ structure and function and their conservation objectives. Where there are adverse impacts, it also includes an assessment of the potential mitigation for those impacts.</p>	<ul style="list-style-type: none"> • Information gathering. • Impact prediction. • Evaluation of development plan impacts in view of conservation objectives. • Where impacts are considered to affect qualifying features, identify how these effects will be avoided or reduced (‘mitigation’).
<p>Stage 3: Assessment of alternative solutions - Where adverse effects are anticipated, this stage examines alternative ways of implementing the project or plan that, where possible, avoid any adverse impacts on the integrity of the Designated site.</p>	<ul style="list-style-type: none"> • Identify alternative solutions and engage with relevant agencies and bodies. • Assess alternative solutions against same criteria set out in stage 2.
<p>Stage Four: Assessment where no alternative solutions exist and where adverse impacts remain - This stage assesses compensatory measures where it is deemed that the project or plan should proceed for imperative reasons of overriding public interest (IROPI).</p>	<ul style="list-style-type: none"> • Identify ‘imperative reasons of overriding public interest’ (IROPI). • Demonstrate no alternatives exist. • Identify potential compensatory measures.

14. This document deals specifically with Stage 1, in order to determine whether the draft Local Plan will have any likely significant effects on Designated Sites, and whether an Appropriate Assessment (stage 2) is necessary. The determination at Stage 1 has been made without consideration of mitigation.
15. Whether an impact is likely or significant has been clarified in case law⁴:
- An effect should be considered 'likely', "if it cannot be excluded, on the basis of objective information, that it will have a significant effect on the site."
 - An effect should be considered 'significant', "if it undermines the conservation objectives."
 - Where a plan or project has an effect on a site "but is not likely to undermine its conservation objectives, it cannot be considered likely to have a significant effect on the site concerned."
16. A plan or project can be allowed to proceed where the impacts or effects could be considered to be "de-minimus" and "...have no appreciable effect on the site", either alone or in-combination with other plans and projects⁵.

Barnet Local Plan

17. Barnet's adopted Local Plan comprises of the Core Strategy 2012, the Development Management Plan 2012 and two Area Action Plans (Colindale and Mill Hill East). The Council are currently in the process of producing a new Local Plan which will replace these documents and will provide a planning policy framework for development up to the period 2036. There are a number of issues that the Local Plan will need to be considered in terms of impact on Designated sites and Ramsar sites, including:
- To deliver a minimum of 35,460 new homes over the plan period.
 - The population is projected to increase by nearly 17% between 2017 and 2036, taking the number of residents up to 452,000.
 - 395,000m² of new office space at Brent Cross Town and 56,600 m² of new retail space at Brent Cross North;
 - Up to 67,000 m² of additional office space across Barnet's town centres,
 - Protecting and enhancing the Boroughs open spaces and recreational facilities.
 - Reducing CO₂ emissions and adapting to climate change.
 - Ensuring resource use is kept within sustainable levels, promoting biodiversity and improving environmental resilience.
 - To improve orbital connectivity and sustainable travel options across the borough and reduce car dependency.
 - Barnet's main water course are of fair to poor chemical quality. New development will need to ensure that it is efficient in its water use and reduce consumption where possible.

⁴ <http://curia.europa.eu/juris/liste.jsf?language=en&num=C-127/02> (Wadanzee) and <http://curia.europa.eu/juris/liste.jsf?language=en&num=C-258/11> (Sweetman)

⁵ <http://curia.europa.eu/juris/liste.jsf?language=en&num=C-258/11> (Sweetman)

- Barnet has been designated as an Air Quality Management Area (AQMA). A significant proportion of growth is planned for in areas that already suffer from air and noise pollution.
- Impact of construction associated with growth strategy.

Identification of relevant sites

18. Whilst there are no Designated Sites that lie wholly or partially within the London Borough of Barnet, there are several in and around London which are in close enough proximity to warrant consideration as to whether there is the potential for being affected by development in the borough. Five Designated Sites are identified within 15km of the London Borough of Barnet's boundaries; these are listed in table two below. A map of the sites and their approximate distance to the borough boundary at the closest point, as the crow flies, is included as Appendix 4.

Table 2: Designated sites within 15km radius of Barnet

European sites	Conservation status	Location	Closest point to boundary with London Borough of Barnet
Lee Valley	Ramsar / SPA	London Borough of Waltham Forest, Epping Forest District Council (Essex), Borough of Broxbourne (Hertfordshire)	6.1km
Epping Forest	Ramsar / SAC	London Borough of Waltham Forest, Epping Forest District Council (Essex), London Borough of Redbridge	8.4km
Richmond Park	SAC	Within the London Borough of Richmond upon Thames and immediately adjacent to the London Borough of Wandsworth and the Royal Borough of Kingston upon Thames.	11.5km
Wimbledon Common	SAC	London Borough and Wandsworth and the London Borough of Merton and immediately adjacent to the Royal Borough of Kingston upon Thames	12km
Wormley-Hoddesdon-park Woods	SAC	Hertfordshire, Bedfordshire	8.2km

Site description

19. Information on the qualifying features for which these sites are designated and which must be maintained to preserve the integrity of the site are presented in Table 3. Conservation objectives, pressures and threats are also outlined. This information has informed the analysis of how the draft Local Plan may affect the integrity of sites. Appendix 3 outlines how the information in Table 3 was collated.

Table 3: Designated sites with the potential to be affected

Epping Forest ^{6,7}				
Epping Forest is an extensive wood-pasture with habitats of high nature conservation value including ancient semi-natural woodland, old grassland plains, wet and dry heathlands and scattered wetland. The semi-natural woodland is particularly extensive but the forest plains are also a major feature and contain a variety of unimproved acid grasslands. The site has a significant amount of Oak and Hornbeam trees, an important habitat of Atlantic acidophilous Beech Forest and is home to a rare species of epiphytes (including mosses). The woodland supports many bird species.				
Site	Qualifying Features and Non-qualifying features	Conservation objectives	Current pressures and threats	Condition
Epping Forest	<p>Epping Forest qualifies as a SAC for both habitats and species.</p> <p>H4010. Northern Atlantic wet heaths with Erica tetralix; Wet heathland with cross-leaved heath</p> <p>H4030. European dry heaths</p> <p>H9120. Atlantic acidophilous beech forests with Ilex and sometimes also Taxus in the shrublayer (Quercion robori-petraeae or Ilici-Fagenion); Beech forests on acid soils</p> <p>S1083. Lucanus cervus; Stag beetle</p> <p>The mosaics of habitat at this site contribute to site integrity. Some plant or animal species (or related groups of such</p>	<p>The conservation objectives and targets are set out in the European Site Conservation Objectives for Epping Forest. The targets are set to maintain the mosaic of heathland and other vegetation, including</p> <ul style="list-style-type: none"> • maintaining wet heath and bare ground • restoring dry heath and supporting species • restoring air quality • maintaining or restoring water quantity and water quality • restoring soil quality • maintaining populations, distribution and supporting habitat for Stag Beetles. 	<p>The main pressures and threats to this site include:</p> <ul style="list-style-type: none"> • Air pollution and the risks of atmospheric nitrogen deposition, • Public access and disturbance upon wet heaths, dry heaths and beech forest; • Undergrazing upon wet and dry heaths. • Changes in species 	<p>Air Pollution: 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.</p> <p>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.</p> <p>Public Access/Disturbance: Epping Forest is subject to high recreational pressure.</p>

⁶ [Site Improvement Plan: Epping Forest - SIP076 \(naturalengland.org.uk\)](https://naturalengland.org.uk/sites/default/files/2019-06/20190601_SIP076_Epping_Forest_SIP.pdf)

⁷ [European Site Conservation Objectives for Epping Forest SAC - UK0012720 \(naturalengland.org.uk\)](https://naturalengland.org.uk/sites/default/files/2019-06/20190601_Epping_Forest_SAC_SCOs_UK0012720.pdf)

	<p>species) make a particularly important contribution to the necessary structure, function and/or quality of qualifying habitats. Many rare and threatened woodland species are specialists adapted to one or a few native trees or shrub species.</p> <p>Stag beetles require decaying wood of broadleaved trees for larvae to feed. Trees adjacent to the SAC can help to maintain colonies of stag beetles, where decaying wood is present.</p> <p>Non-qualifying species with importance for wet heath, dry heath as well as native species are listed in the conservation objectives report.</p>		<p>distribution, disease and invasive species upon beach forest.</p> <ul style="list-style-type: none"> • Water quantity changes, water pollution and invasive species upon wet heaths. • Increased recreation pressure. 	<p>Species Distribution: Beech tree health and recruitment may not be coping sufficiently with environmental conditions to sustain its presence and representation within the SAC feature.</p> <p>Water levels: Wet heath is dependent on suitable ground water levels. There is a threat of prolonged drying out through climate change.</p> <p>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.</p> <p>Invasive species: Heather beetle has locally impacted on some heathland areas. Potential future impact from Grey Squirrels.</p> <p>Disease: Tree diseases such as Phytophthora present a real threat to Beech trees.</p> <ul style="list-style-type: none"> • 35.48% of the site is in a 'Favourable' condition. This is equivalent to 643.31 hectares of the site. • 48.17% of the site is in an 'Unfavourable recovering' condition. This is equivalent to 861.19 hectares. • 14.53% of the site is in an 'Unfavourable No change' condition. This is
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				<p>equivalent to 259.76 hectares of the site.</p> <ul style="list-style-type: none"> • 1.83% of the site is in an 'Unfavourable Declining' status. This is equivalent to 32.66 hectares.
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Richmond Park ^{8,9}

Richmond Park SAC is a parkland site covering 847ha. It has been managed as a royal deer park since the 17th century and continues to be managed as one of London's Royal Parks. It is significant for its dry acid grassland and neutral unimproved grassland mosaic, extensive wooded areas and an impressive population of veteran trees. These habitats support a rich invertebrate assemblage; in the case of the woodland and veteran trees this relates to saproxylic invertebrates, particularly Stag Beetles, for which the SAC is designated.

Site	Qualifying features	Conservation objectives	Current pressures and threats	Condition
Richmond Park	<p>The site is designated as an SAC due to the presence of Annex II species Stag Beetle <i>Lucanus cervus</i>.</p> <p>The combination of historic grazing by deer and geology has had a significant impact, producing a mosaic of habitats including acid grassland, marshy grassland and neutral grassland as well as open parkland and wood pasture. The area of unimproved acid grassland within the park is the largest in Greater London, characterised by native grasses such as brown bent <i>Agrostis canina</i>, sheep's fescue <i>Festuca ovina</i> and wavy hair-grass <i>Deschampsia flexuosa</i>. In marshier grassland, species such as purple moor-grass</p>	<ul style="list-style-type: none"> • 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. • Maintain a well-structured broadleaved woodland habitat, with sheltered, sunlit glades and rides containing stumps and other suitable decaying wood. • Ensure the continuity of timber decay and nutrient recycling processes, in particular the continued provision of plentiful decaying stumps and roots. • Maintain or restore the presence of the stag beetle population across its full 	<p>No current issues affecting the Natura 2000 feature(s) have been identified on this site within the latest reports.</p>	<p>100% of this site is in an 'Unfavourable – Recovering' condition.</p>

⁸ [UK0030082_RichmondParkSAC_COSA_final advice 31 May 2016 \(1\).pdf](#)

⁹ [SIP141211FINALv1 0 Richmond Park.pdf](#)

	<p>Molinia caerulea and heath rush Juncus squarrosus occur. Where the ground is permanently waterlogged, rushes Juncus spp., sedges Carex spp. and tufted hair grass Deschampsia cespitosa are prevalent.</p> <p>The parkland supports many ancient and veteran trees, particularly oak, which host a significant assemblage of invertebrates associated with dead and decaying wood.</p>	<p>range within the SAC, whilst avoiding deterioration from its current level as indicated by the latest mean peak count or equivalent.</p> <ul style="list-style-type: none"> • 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. 		
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Wimbledon Common ^{10, 11}

Wimbledon Common is one of the largest areas of uncultivated land in the conurbation of London and sits in the Thames Valley Natural Character Area. It supports a mosaic of habitats including broadleaved woodland, acid grassland, dry and wet heath, scrub and mire. The underlying soils are mostly sands, gravels and silty clays which give rise to poorly-drained, nutrient poor and acid conditions. The range of habitats supports a wide diversity of plants and animals, including many which are scarce in the London area. The SAC is a particular stronghold for the stag beetle *Lucanus cervus* in the south east of England and is at the heart of the local centre of distribution of the species. The site provides ideal habitat conditions for the stag beetle, such as extensive areas of undisturbed woodland and large quantities of decaying wood. The site is also important in supporting small but important areas of heathland, a very scarce habitat in the London area.

Site	Qualifying features	Conservation objectives	Current pressures and threats	Condition
Wimbledon Common	<p>The site qualifies as an SAC site due to the presence of:</p> <ul style="list-style-type: none"> Northern Atlantic wet heaths with <i>Erica tetralix</i> European dry heath. <p>The site is primarily designated for the following Annex II species:</p> <ul style="list-style-type: none"> Stag Beetles <i>Lucanus cervus</i>. <p>Wimbledon Common SAC has a large number of old trees and a great quantity of fallen decaying timber which a number of other scarce invertebrate species associated with</p>	<ul style="list-style-type: none"> Maintain or restore 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 are retained wherever possible as a larval food resource. Maintain or restore a well-structured broadleaved woodland habitat, with sheltered, sunlit glades and rides containing stumps and other suitable decaying wood. Ensure the continuity of processes of timber decay and nutrient recycling, in particular 	<p>The main pressures and threats to this site include:</p> <ul style="list-style-type: none"> Public Access/ Disturbance Habitat Fragmentation Invasive Species Air Pollution: impact of atmospheric nitrogen deposition. 	<p>Public Access/ Disturbance: High visitor use of the site causes damage to sensitive habitats, and results in adverse impacts such as compaction around the base of mature trees and removal of fallen timber.</p> <p>Habitat Fragmentation: The Stag beetle remains vulnerable to extinction in the UK as a result of habitat loss and fragmentation of populations.</p> <p>Invasive Species: Oak processionary moth is now well-established at Richmond Park and other sites in the London area; this species represents a serious threat to human health. Control is potentially damaging to invertebrate populations and is expensive which may result in reduced nature conservation management.</p> <p>Air Pollution: impact of atmospheric nitrogen deposition: Nitrogen deposition exceeds site</p>

¹⁰ [European Site Conservation Objectives for Wimbledon Common SAC - UK0030301 \(naturalengland.org.uk\)](https://naturalengland.org.uk/european-site-conservation-objectives-for-wimbledon-common-sac-uk0030301)

¹¹ [Site Improvement Plan: Wimbledon Common - SIP262 \(naturalengland.org.uk\)](https://naturalengland.org.uk/site-improvement-plan-wimbledon-common-sip262)

	<p>decaying timber. Trees on adjacent sites may also support Stag Beetles where fallen and decaying timber is found.</p>	<p>the continued provision of plentiful decaying stumps and roots.</p> <ul style="list-style-type: none"> • Maintain or restore the presence of the stag beetle population across its full range within the SAC, whilst avoiding deterioration from its current level as indicated by the latest mean peak count or equivalent. • 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 stag beetle feature and/or its supporting habitats. 		<p>relevant critical loads. Wimbledon Common is subject to high levels of atmospheric nitrogen oxide and ammonia deposition which is likely to be having deleterious effects on sensitive habitats, particularly the heath and mire vegetation</p> <ul style="list-style-type: none"> • 333.77ha of the site is 'Unfavourable – Recovering' condition. This is equivalent to 94.99% of the site. • 17.62 ha of the site is in 'Unfavourable – No Change' condition. This is equivalent to 5.01% of the site.
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Wormley-Hoddesdonpark Woods SAC ^{12, 13}

Wormley-Hoddesdonpark Woods is one of two outstanding examples in England of a type of oak-hornbeam forest mainly found in central Europe. Sessile and pedunculate oaks are key components of the canopy. Hornbeam is mixed with oaks and other trees in areas of high forest and is also present as almost pure stands of stored coppice, some of which are being brought back into a coppice cycle. Over 95% of the site is ancient woodland. It includes areas of wood-pasture and many veteran pollards and coppice stools. Distinctive features of the ground flora include stands of great wood-rush and an unusual moss community more typical of continental Europe.

Site	Qualifying features	Conservation objectives	Current pressures and threats	Condition
Wormley-Hoddesdonpark Woods	<p>The site qualifies as an SAC site due to the presence of:</p> <p>Sub-Atlantic and medio-European oak or oak-hornbeam forests of the Carpinion betuli</p> <p>The site also contains</p> <ul style="list-style-type: none"> • <i>Sessile oak Quercus petraea</i> • <i>Bluebell Hyacinthoides non-scripta</i> • <i>Great wood-rush Luzula sylvatica</i>. <p>Mosses:</p> <ul style="list-style-type: none"> • <i>Dicranum majus and Leucobryum glaucum</i>. • <i>Dicranum montanum</i>, • <i>D. flagellare</i> • <i>D. tauricum</i>. 	<p>Sub-Atlantic and medio-European oak or oak-hornbeam forests of the Carpinion betuli:</p> <ul style="list-style-type: none"> • Maintain extent, distribution and configuration of feature. • Maintain or restore <i>Quercus robur</i> – <i>Pteridium aquilinum</i> – <i>Rubus fruticosus</i> Woodland characteristics. • Maintain range of age classes, canopy cover and presence of ancient and veteran trees. • Maintain temporary and restore permanent open space. • Maintain vegetation structure – old wood, dead 	<p>The main pressures and threats to this site include:</p> <ul style="list-style-type: none"> • Disease • Invasive Species • Air Pollution: impact of atmospheric nitrogen deposition • Public Access/ Disturbance • Deer • Forestry and Woodland Management • Illicit vehicles. 	<p>Disease: Acute Oak Decline (AOD) is present in at least two parts of the site and affects both native oak species, which are key components of this woodland type. Oaks can be killed by AOD within 5 years of symptoms appearing. Research is underway on the causal agents and spread of the disease. Based on current knowledge AOD has the potential in the long-term to cause high oak mortality right across the site.</p> <p>Invasive Species: Several tree and shrub species not native to the site are present. Where they are not being actively controlled, they are gradually spreading. The more invasive of these include sycamore, turkey oak, rhododendron and snowberry</p> <p>Air Pollution: impact of atmospheric nitrogen deposition: Nitrogen deposition exceeds the site-relevant critical load for ecosystem protection and hence there is a risk of harmful effects, but the sensitive features are currently considered to be in favourable condition on the site.</p>

¹² [Site Improvement Plan: Wormley Hoddesdonpark Woods - SIP265 \(naturalengland.org.uk\)](https://naturalengland.org.uk)

¹³ [European Site Conservation Objectives for Wormley-Hoddesdonpark Woods SAC - UK0013696 \(naturalengland.org.uk\)](https://naturalengland.org.uk)

<p>The largest part of the site is oak-bracken-bramble woodland, dominated by sessile oak <i>Quercus petraea</i> and hornbeam <i>Carpinus betulus</i>, with areas of pedunculate oak <i>Quercus robur</i> and hornbeam. Further there are large stands of almost pure hornbeam (former coppice). There are also marshy areas with alder <i>Alnus glutinosa</i>, pendulous sedge <i>Carex pendula</i> and yellow pimpernel <i>Lysimachia nemorum</i> as well as areas with higher proportions of ash <i>Fraxinus excelsior</i>, Dogs Mercury <i>Mercurialis perennis</i> and Yellow Archangel <i>Lamium galeobdolon</i> on the chalky boulder clay. Areas dominated by bluebell <i>Hyacinthoides non-scripta</i> do occur, but elsewhere there are stands of great wood-rush <i>Luzula sylvatica</i> with carpets of the mosses <i>Dicranum majus</i> and <i>Leucobryum glaucum</i>. Locally, a bryophyte community more typical of continental Europe occurs, including the mosses <i>Dicranum montanum</i>, <i>D. flagellare</i> and <i>D. tauricum</i>. Na-</p>	<p>wood, shrubs, woodland edge, site native trees.</p> <ul style="list-style-type: none"> • Maintain low level grazing and allow for regeneration with saplings. • Maintain soil types and structure. • Maintain wider connections in the functional landscape. • Restore as necessary, 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. • Maintain hydrological function. • Limit impacts of artificial light. 	<p>Public Access/ Disturbance: The site is a large, attractive area of ancient woodland with extensive public access and close to large urban centres, so it is heavily used by the public for recreational purposes. Sensitive management of access points and routes by the site's main owners has been largely successful in mitigating the potential adverse effects of this high level of use. However, visitor numbers continue to increase, the types of use can change unpredictably and less obvious adverse effects on important flora and fauna could be missed during routine, 'general purpose' monitoring.</p> <p>Deer: Browsing and grazing by deer can reduce tree regeneration (from seedlings or coppice stools) and damage the woodland understorey and ground flora. At this site, deer damage levels are currently only moderate and do not appear to be affecting tree regeneration, habitat structure or species composition greatly. However, subtle damaging effects can be difficult to identify and monitor, and deer populations can increase rapidly.</p> <p>Forestry and Woodland Management: The larger woodland units with public access are under appropriate management but some of the smaller, privately-owned units are not. Though it is quite acceptable for a significant proportion of the site to be left as 'minimum intervention' high forest, in some circumstances a lack of active management can lead to adverse effects. These include a reduction in structural and species diversity (particularly in previously coppiced areas), the loss of temporary and permanent open space, the over-shading and deterioration of veteran pollards, and the spread of invasive species.</p>
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	<p>tionally the woods are regarded as the best remaining example of the south eastern sessile oak hornbeam woods. Understorey species may include: hawthorn, blackthorn, crab apple, field maple, hazel, willow.</p>			<p>Illicit vehicles: Illegal use of restricted byways and bridleways by off-road vehicles causes localised but sometimes severe rutting and soil compaction, damaging the woodland ground flora, shrubs and trees. Fly-tipping damages the ground flora directly and can introduce toxins and alien species.</p> <ul style="list-style-type: none"> • The qualifying features are mostly in favourable or unfavourable-recovering condition (140ha). • Areas in unfavourable condition, including grassland, amount to less than 7ha. • The NE management plan for this site, produced in 2015, states that the qualifying features are mostly in favourable condition.
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Lee Valley - The Lee Valley Regional Park includes 450ha of protected open water and wetland vegetation carefully managed to support a diversity of plant and animal species. The reservoirs also support nationally and regionally important. The area is also very popular for recreational activities and is designated a Regional Park. The Lee Valley Park Authority is responsible for managing the important balance between nature conservation and recreational activity on the site. Special Protection Areas within Lee Valley Regional Park include Amwell Quarry, Rye Meads, Turnford and Cheshunt Pits and Walthamstow Reservoirs SSSIs. All habitats within the SPA are manmade.

Site	Qualifying Features	Conservation objectives	Current pressures and threats	Condition
Lee Valley	<p>The site qualifies as a SPA site for the presence of the following Annex I species:</p> <ul style="list-style-type: none"> • Bittern, Botaurus stellaris, • Gadwall, Anas strepera • Northern Shoveler Spatula clypeata • water-milfoil Myriophyllum Verticillatum • water boatman Micronecta minutissima. <p>Walthamstow Reservoir, constructed in the latter half of the nineteenth century, comprises of ten relatively small and shallow water storage basins. Several</p>	<p>Great Bittern:</p> <ul style="list-style-type: none"> • Support the mosaic of habitat, water quality and water quantity, maintain conservation processes inside and outside the designated area. • Maintain 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 (www.apis.ac.uk). • Restore population abundance of the Great Bittern, ensure safe passage. • Maintain reedbed structure, wet ditches and pools • Minimise human disturbance • Restore the distribution, abundance and availability of key 	<p>The main pressures and threats to this site include:</p> <ul style="list-style-type: none"> • Water pollution • Hydrological changes • Public access / disturbance • Inappropriate scrub control • Fisheries: Fish stocking • Invasive Species • Inappropriate cutting/mowing • Air pollution. 	<p>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.</p> <p>Hydrological changes: Reservoir levels linked to operational requirements and all water bodies subject to natural fluctuations accounting for abstraction and climatic change.</p> <p>Public access / disturbance: Areas of the SPA are subject to a range of recreational pressures including watersports, angling and dog walking. This has the potential to affect SPA populations directly or indirectly.</p> <p>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.</p> <p>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.</p>

¹⁴ [European Site Conservation Objectives for Lee Valley SPA - UK9012111 \(naturalengland.org.uk\)](http://naturalengland.org.uk)

¹⁵ [Site Improvement Plan: Lee Valley - SIP118 \(naturalengland.org.uk\)](http://naturalengland.org.uk)

	<p>of these are fringed by sloping earth banks and together with the presence of wooded islands form distinctive habitat features. Rye Meads SSSI comprises of wet meadows, disused and operational effluent lagoons and Rye House marsh. These three areas provide a variety of different habitats including open water habitats swamp communities, tall fen communities, marshy grassland and scrub. The meadows are the last substantial remnants of ancient floodplain on the rich alluvial soils of the Lee Valley. The site supports one of the largest areas of tall fen vegetation in the county and provides a valuable habitat for birds and locally uncommon plants. Amwell Quarry SSSI is a former gravel pit site in the Lee Valley near Ware, which supports nationally important numbers of wintering wildfowl, along with outstanding assemblages of breeding birds and of dragonflies and damselflies. The</p>	<p>prey items (e.g. eel, rudd, roach, frogs, toads) at preferred prey sizes</p> <p>Gadwall (Non-breeding)</p> <ul style="list-style-type: none"> • Support the mosaic of habitat, water quality and water quantity, maintain conservation processes inside and outside the designated area • Maintain 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 (www.apis.ac.uk). • Maintain population • Maintain habitat and depth of water • Minimise human disturbance • Maintain a high cover/abundance of preferred food plants (e.g. sweet-grass <i>Glyceria fluitans</i>, creeping bent <i>Agrostis stolonifera</i>, stoneworts <i>Chara</i>, pondweeds <i>Potamogeton</i>, <i>Ceratophyllum</i> spp., <i>Ruppia</i>). <p>Northern shoveler (Non-breeding):</p> <ul style="list-style-type: none"> • Support the mosaic of habitat, water quality and water quantity, maintain conservation processes inside and outside the designated area 		<p>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: Nitrogen deposition exceeds site relevant critical loads</p> <p>Walthamstow Reservoirs</p> <ul style="list-style-type: none"> • 100% of the site is achieving an 'Unfavourable Recovering' condition. This is equivalent to 180 hectares. <p>Turnford and Cheshunt Pits Reservoir</p> <ul style="list-style-type: none"> • 100% of the site is in 'Favourable' condition. This is equivalent to 174 hectares. <p>Rye Meads</p> <ul style="list-style-type: none"> • 23.75 hectares are in 'Favourable' condition. 23.75 hectares are in 'Unfavourable Recovering' condition. <p>Amwell Quarry</p> <ul style="list-style-type: none"> • 100% of the site is in 'Favourable' condition. This is equivalent to 30 hectares.
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	<p>site includes two large lakes which were excavated between 1973 and 1990, and a variety of associated wetland, grassland and woodland habitats. The Turnford and Cheshunt Pits SSSI include ten former gravel pits ranging in age from North Metropolitan Pit which is among the oldest pits in the Lee Valley to Hooks Marsh Lake which was not excavated until the 1970s, and cover a span of over 40 years. Because of the profusion of pits and islands, several of the pits have extensive shorelines; North Metropolitan Pit alone having an estimated shoreline of about 7.2km. Also included in the site are all the associated areas of marsh, grassland, ruderal herbs, scrub and woodland; part of the Small River Lee; and a further water body, Hall Marsh Scrape, which was constructed specifically for use by waterfowl. The pits are of national importance for wintering gadwall and shoveler.</p>	<ul style="list-style-type: none"> • Maintain 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 (www.apis.ac.uk). • Restore population abundance of the Shoveler, ensure safe passage • Maintain habitat structures • Minimise human disturbance • Restore high cover/abundance of preferred food plants (e.g. Scirpus, Eleocharis, Carex, Potamogeton, Glyceria, surface plankton). Restore the distribution, abundance and availability of key prey items (e.g. Hydrobia, crustaceans, caddisflies, Diptera, beetles) at preferred prey sizes. 		
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Pathways

19. In order to consider impacts on the protected site network, HRA considers the likely 'pathways' that will impact on them. This document refers to the pathways identified in the HRA for the London Plan (AECOM 2018 and updated¹⁶), namely:

- Impacts from urbanisation and recreational activities (including disturbance and abrasion)
- Atmospheric pollution
- Water abstraction
- Water quality.

20. The main impacts from the Barnet Plan would be through the quantum of increased development. Policies have been screened for impacts on this basis. The Plan has been reviewed in the context of the level of development already planned for within the adopted London Plan, and wider London strategies. A consideration of the pathways and the potential impact of the Barnet Plan on the designated sites is set out later in this document when considering impacts of individual policies, indirect impacts and in-combination impacts. Paragraphs 23 onwards discuss Zones of Influence in relation to each site and potential pathways.

21. Table 4 summarises the main impact pathways considered for each site:

European Site	Recreational Pressure	Air Pollution	Water quantity and impacts on water quantity
Lee Valley	Small area of Lee Valley within ZOI of 7km Potential impact pathway - No likely significant effects due to the distances involved and the small area affected.	Potential impact pathway - No likely significant effects due to the distances involved and the small area affected.	Small area of Lee Valley within ZOI of 7km No likely significant effects due to the distances involved and the small area affected.
Epping Forest	No impact pathway – distance greater than ZOI of 6.2km.	Potential impact pathway - No likely significant effects due to the distances involved.	No impact pathway.
Richmond Park	No impact pathway – distance greater than ZOI of 7km.	No impact pathway.	No impact pathway.
Wimbledon Common	No impact pathway – distance greater than ZOI of 7km.	No impact pathway.	No impact pathway.
Wormley-Hoddesdonpark Woods	No impact pathway – distance greater than ZOI of 7km.	Potential impact pathway - No likely significant effects due to the distances involved.	No impact pathway.

¹⁶ <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/london-plan-2021>

Screening of the Local Plan Policies for potential effects

22. As assessment was carried out in order to identify the potential for each of the draft Local Plan policies to have a likely significant effect on Designated sites. Details of the reason for the screening impacts reached for each policy are set out in Table 5.

Table 5: Screening of local plan policies

Policy	Assessment	Potential for likely significant effects?
Growth and spatial strategy		
BSS01 Barnet's Spatial Strategy	This policy provides an overarching spatial strategy to capture the aspirations for Barnet's preferred approach over the Plan period. Development will be within the Borough's boundaries and not in proximity to Designated Sites. There are not likely to be any significant effects on Designated Sites, due to the distances involved and the lack of connectivity with identified pathways.	No
GSS01 – Delivering Sustainable Growth	This policy aims to create conditions for sustainable growth and direct growth to the most sustainable locations within the borough, which are located away from designated sites. Development will be within the Borough's boundaries and not in proximity to Designated Sites There are not likely to be any significant effects on Designated Sites, due to the distances involved and the lack of connectivity with identified pathways.	No
GSS02 – Brent Cross Growth Area	This policy supports comprehensive regeneration of Brent Cross and promotes a mixed-use area with an integrated network of open spaces, pedestrian and cycling routes. It also requires new development provide community infrastructure and ensure the restoration and enhancement of the River Brent and its corridor to provide both amenity and nature conservation to the area. In addition, the policy encourages a range of sustainable transport improvements. These measures will have long term, indirect environmental benefits although these indirect impacts are not likely to affect the Designated sites within the scope of the study due to their distance from the Borough's boundary. Development will be within the Borough's boundaries and not in proximity to Designated Sites There are not likely to be any significant effects on Designated Sites, due to the distances involved and the lack of connectivity with identified pathways.	No
GSS03 – Brent Cross West Growth Area	This policy promotes growth and regeneration at Brent Cross West / Staples Corner which optimises density, infrastructure and jobs. Development will be directed away from major road infrastructure, particularly the A406 North Circular Road. Development will be within the Borough's boundaries and not in proximity to Designated Sites There are not likely to be any significant effects on Designated Sites, due to the distances involved and the lack of connectivity with identified pathways.	No

Policy	Assessment	Potential for likely significant effects?
GSS04 – Cricklewood Growth Area	This policy supports regeneration and intensification in and around the Cricklewood, and is supported by high existing PTAL levels and planned transport infrastructure improvement and under used sites. Residential density and delivering improvements to amenity will also be supported. These measures will have long term, indirect environmental benefits although these indirect impacts are not likely to affect the Designated sites within the scope of the study due to their distance from the Borough’s boundary. Development will be within the Borough’s boundaries and not in proximity to Designated Sites There are not likely to be any significant effects on Designated Sites, due to the distances involved and the lack of connectivity with identified pathways.	No
GSS05 – Edgware Growth Area	This policy promotes regeneration and intensification in and around the Edgware Town Centre and is supported by high existing PTAL levels. Residential density and delivering improvements to amenity will also be supported. Development will be within the Borough’s boundaries and not in proximity to Designated Sites There are not likely to be any significant effects on Designated Sites, due to the distances involved and the lack of connectivity with identified pathways.	No
GSS06 – Colindale Growth Area	This policy supports growth in Colindale, particularly at Colindale Station, Grahame Park Estate and the former Peel Estate. Growth will be supported by new community facilities, a new underground station, improvements to open space and public realm, in addition to new pedestrian and cycle routes. These measures will have long term, indirect environmental benefits although these indirect impacts are not likely to affect the Designated sites within the scope of the study due to their distance from the Borough’s boundary. Development will be within the Borough’s boundaries and not in proximity to Designated Sites There are not likely to be any significant effects on Designated Sites, due to the distances involved and the lack of connectivity with identified pathways.	No
GSS07 – Mill Hill East	This policy seeks to deliver new housing in Mill Hill East, whilst also giving consideration to the Mill Hill conservation Area and the green belt but it is not likely to have impact on any Designated sites. Development will be within the Borough’s boundaries and not in proximity to Designated Sites There are not likely to be any significant effects on Designated Sites, due to the distances involved and the lack of connectivity with identified pathways.	No
GSS08 – Barnet’s District Town Centres	This policy sets Barnet capacity for town centre development, including high level design requirements and development criteria. Development will be within the Borough’s boundaries and not in proximity to Designated Sites There are not likely to be any significant effects on Designated Sites, due to the distances involved and the lack of connectivity with identified pathways.	No

Policy	Assessment	Potential for likely significant effects?
GSS09 – Existing and Major New Transports infrastructure	This policy sets out transport infrastructure needed to deliver growth and regeneration within the Borough and will not have any likely impact on designated sites.	No
GSS10 – Estate Renewal	This policy aims to improve the quality of housing estates in the borough and sets out a range of development criteria including adequate provision of amenity and open spaces, and the promotion of active travel. These measures may have indirect environmental benefits although they are not likely to impact the Designated sites within the scope of the study due to their distance from the Borough’s boundary.	No
GSS11 – Major Thoroughfares	This policy sets criteria for development along thoroughfares. It promotes sustainable development through the provision of walking and cycling modes, high quality design, access to open spaces and optimisation of building density. These measures may have indirect environmental benefits although they are not likely to impact the European sites within the scope of the study due to their distance from the Borough’s boundary.	No
GSS12 Redevelopment of Car Parks	This policy sets criteria for the development of and above surface level public car parks for residential and other suitable uses, with the concentration of development in existing urban areas.	No
Policy GSS13 Strategic Parks and Recreation	This policy aims to promote a new Regional Park within designated Green Belt or Metropolitan Open Land in the Brent Valley and Barnet Plateau. There are not likely to be any significant effects on Designated Sites, due to the distances involved and the lack of connectivity with identified pathways.	No
Housing		
HOU01 – Affordable Housing	Within the context of a strategic London Plan target of 50% of all new homes to be affordable the Council will seek a minimum of 35% affordable housing from all developments of 10 or more units. This policy in itself will not lead to development and is therefore not likely to have significant effects on Designated sites.	No
HOU02 – Housing mix	This policy aims to provides mix of dwelling types and sizes in order to provide choice for a growing and it is therefore not likely to have significant effects on Designated sites.	No
HOU03 – Residential Conversions and Redevelopment	This policy aims to manage housing growth and ensure that residential conversions to not have a detrimental impact on local areas. The policy will not itself lead to development and the housing development. There are not likely to be any significant effects on Designated Sites, due to the distances involved and the lack of connectivity with identified pathways.	No
HOU04 - Specialist Housing	This policy sets out how specialist housing will be provided, including housing for older people, HMOs, student accommodation and shared living accommodation. There is not likely to be any significant effect on Designated sites.	No

Policy	Assessment	Potential for likely significant effects?
HOU05 – Efficient Use of Barnet’s Housing Stock	This policy seeks to ensure the efficient use of Barnet’s housing stock in addressing identified housing needs. There is not likely to be any significant effect on Designated sites.	No
HOU06 – Meeting Other Housing Needs	This policy aims to provide the right number of homes to meet various different housing needs. There is not likely to be any significant effect on Designated sites.	No
HOU07 - Gypsies, Travellers and Travelling Showpeople	This policy outlines the criteria for the provision of pitches and plots for Gypsies, Travellers and Travelling show people. There is not likely to be any significant effect on Designated sites.	No
Character, Design and Heritage		
CDH01 - Promoting High Quality Design	This policy sets out requirements to ensure that development is to a high-quality design. It will not in itself lead to development and therefore, it is not likely to have significant effects on effect on Designated sites.	No
CDH02 - Sustainable and Inclusive Design	The policy provides design requirements for new development in respect of accessibility. The policy in itself will not lead to development and therefore, it is not likely to have significant effects on Designated sites.	No
CDH03 – Public Realm	This policy sets criteria for public realm as a key aspect of effective design in neighbourhoods and town centres. These measures may have indirect environmental benefits, for example through the provision of Green Infrastructure, although they are not likely to impact the Designated sites within the scope of the study due to their location in existing urban areas.	No
CDH 04- Tall Buildings	The policy provides design requirements for the developments of tall buildings in respect of the Barnet’s character and heritage. There are not likely to be any significant effects on Designated Sites, due to the distances involved and the lack of connectivity with identified pathways.	No
CDH05 - Extensions	This policy provides design criteria for extensions to ensure that account of context and local character and be designed in accordance with the Residential Design Guidance and Sustainable Design and Construction SPDs. The policy will not in itself lead to development and therefore, it is not likely to have significant effects on Designated sites.	No
CDH06 – Basements	This policy provides design criteria for basements to ensure that account of context and local character and be designed in accordance with the Residential Design Guidance and Sustainable Design and Construction SPDs. The policy will not in itself lead to development and therefore, it is not likely to have significant effects on Designated sites.	No

Policy	Assessment	Potential for likely significant effects?
CDH07 - Amenity Space and Landscaping	This policy will not lead to development but rather seeks to outline criteria that proposals for outdoor space and amenity should adhere to and therefore, it is not likely to have significant effects on Designated sites.	No
CDH08 – Barnet’s Heritage	The policy seeks to conserve the boroughs heritage assets and their setting and will not itself lead to development and therefore, it is not likely to have significant effects on Designated sites.	No
CDH09 - Advertisements	This policy sets out design requirements for advertisements and will not itself lead to development and therefore, it is not likely to have significant effects on Designated sites.	No
Town Centres		
TOW01 - Vibrant Town Centres	This policy seeks to promote the vitality and viability of the Borough’s town centres by distributing growth appropriately and retaining, a strong hierarchy of town centres that support a mix of uses. Development will be within the Borough’s boundaries in existing urban areas and directed away from Designated sites. There are not likely to be any significant effects on Designated Sites, due to the distances involved and the lack of connectivity with identified pathways.	No
TOW02 - Development Principles in Barnet’s Town Centres, Local Centres and Parades	This policy sets out a range of criteria for development proposals in town centres and will not in itself lead to development and therefore, it is not likely to have significant effects on Designated sites.	No
TOW03 - Managing Hot Food Takeaways, Adult Gaming Centres, Amusement Arcades, Betting Shops, Pay-day Loan Shops, Pawnbrokers and Shisha Bars	This policy will not lead to development but rather seeks to resist uses (hot food take away and betting shops) in town centres that would adversely affect amenity. For this reason, it is not likely to have significant effects on Designated sites.	No
TOW04 - Night –Time Economy	This policy supports the provision of night-time economy uses in town centres provided that there is no adverse impact. Development will be within the Borough’s boundaries in existing urban areas and directed away from Designated sites. There are not likely to be any significant effects on Designated Sites, due to the distances involved and the lack of connectivity with identified pathways.	No
Community Uses, Health and Wellbeing		
CHW01 – Community Infrastructure	This policy is mostly concerned with the preservation of existing social and community uses. It promotes flexible community spaces and where development places increased demand on current facilities, new facilities and/or contributions will be required. Development will be within the Borough’s boundaries in existing urban	No

Policy	Assessment	Potential for likely significant effects?
	areas and directed away from Designated sites. There are not likely to be any significant effects on Designated Sites, due to the distances involved and the lack of connectivity with identified pathways.	
CHW 02 – Promoting health and well being	This policy seeks to improve health and wellbeing across the Borough, which will include investment in play and leisure facilities. Development will be within the Borough’s boundaries in existing urban areas and directed away from Designated sites. There are not likely to be any significant effects on Designated Sites, due to the distances involved and the lack of connectivity with identified pathways.	No
CHW03 – Strategic Recreational Facilities	This policy sets out a range of measures that will be undertaken to improve community safety will not in itself lead to new development. For this reason, it is not likely to have significant effects on Designated sites.	No
CHW04 - Making Barnet a safer place	This policy sets out a range of measures to make the borough a safer place and will not in itself lead to development. For this reason, it is not likely to have significant effects on Designated sites.	No
CHW05 – Protecting Public Houses	This policy is concerned with the preservation and protection of public houses and will not in itself lead to new development. For this reason, it is not likely to have significant effects on Designated sites.	No
Economy		
ECY01 - A Vibrant Local Economy	This policy seeks to protect and promote new employment opportunities. Development will be within the Borough’s boundaries in existing urban areas and directed away from Designated sites. There are not likely to be any significant effects on Designated Sites, due to the distances involved and the lack of connectivity with identified pathways.	No
ECY02 - Affordable Work-space	This policy promotes economic diversity and supports existing and new business development in Barnet. Development will be within the Borough’s boundaries in existing urban areas and directed away from Designated sites. There are not likely to be any significant effects on Designated Sites, due to the distances involved and the lack of connectivity with identified pathways.	No
ECY03- Local Jobs, Skills and Training	This policy aims to increase local employment opportunities across the Borough and will not in itself lead to development. For this reason, it is not likely to have significant effects on Designated sites.	No
Economy and Climate Change		
ECC01 – Mitigating Climate Change	The policy sets out design requirements for development to adapt to climate change. As such, it is designed to safeguard the built environment and will not itself lead to development and for this reason, it is not likely to have significant effects on Designated sites.	No

Policy	Assessment	Potential for likely significant effects?
ECC02 - Environmental Considerations	This policy sets out environmental considerations that will be taken into account when assessing development proposals, including air pollution and noise levels, water infrastructure and quality. This may indirectly benefit biodiversity through the reduction of air pollution impacts upon nearby habitats (although effects on the Designated sites within the scope of this HRA are unlikely due to their distance from the Borough boundary).	No
ECC02A -Water Management	This policy seeks to mitigate against flooding and puts measures in place to protect/enhance the overall water environment in Barnet. This may indirectly benefit the environment and biodiversity (although effects on the Designated sites within the scope of this HRA are unlikely due to their distance from the Borough boundary, and lack of connectivity with identified pathways).	No
ECC03 – Dealing with Waste	This policy encourages sustainable waste management through a range of measures, including the designation of sites through the NLWP to meet aggregated apportionment targets, which will be the principal sites for waste facilities. Development will be within the Borough’s boundaries in existing urban areas and directed away from Designated sites. There are not likely to be any significant effects on Designated Sites, due to the distances involved and the lack of connectivity with identified pathways.	No
ECC04 – Barnet’s Parks and Open Spaces	This policy seeks to maximise the benefits of open space in Barnet and improve green infrastructure. This will help to provide alternative outdoor recreation away from Designated sites.	No
ECC05 - Green Belt and Metropolitan Open Land	This policy sets out a range of criteria for development on the green belt and seeks to protect MOL from inappropriate development so not likely to have any negative effect on any Designated site.	No
ECC06 - Biodiversity	This policy seeks to protect, enhance or create biodiversity in development through a range of measures, which may indirectly benefit biodiversity through habitat creation (although effects on the Designated sites within the scope of this HRA are unlikely due to their distance from the Borough, and the lack of connectivity with identified pathways).	No
Transport and communications		
TRC01 – Sustainable and Active Travel	This policy promotes a more sustainable travel network. The policy may therefore indirectly benefit the natural environment by facilitating a modal shift away from the private car, reducing the potential for air pollution impacts affecting nearby habitats (although effects on the Designated sites within the scope of this HRA are unlikely due to their distance from the Borough, and the lack of connectivity with identified pathways) and will not itself lead to development.	No

Policy	Assessment	Potential for likely significant effects?
TRC02 – Transport Infrastructure	This policy promotes the delivery of new transport infrastructure to support the travel needs of a growing population and sets out specific pieces of transport infrastructure that will be delivered throughout the plan period. It actively promotes public transport and low emission vehicles which may indirectly benefit the natural environment; however, any significant effects on Designated sites within the scope of this HRA are unlikely due to their distance from the Borough.	No
TRC03 – Parking Management	This policy aims to control parking throughout the borough and will not in itself lead to development.	No
TRC04 – Digital Communication and Connectivity	The policy sets out how development should provide communication and utilities infrastructure and will not itself lead to development.	No

Summary of draft policies in relation to the HRA

23. Overall, none of the policies in the draft Plan are considered likely to result in significant effects on the designated sites within the scope of the study. Policies promoting development are within limits set by higher level plans, including the London Plan. Significant effects are considered unlikely as many of the policies will not result directly in development, rather they set out criteria for development that will be determined under other, more specific policies, which have been screened separately for their potential to affect designated sites. Policies within the draft Plan have been reviewed ‘as drafted’ and have not been amended in anticipation of effects on the designated site network.

Direct and Indirect Impacts

24. Taking a precautionary approach, it is necessary to consider whether the increased population anticipated for Barnet over the plan period could have indirect impacts on the designated sites. The potential for indirect impacts that need to be considered are increased recreational demand, increased demand on water resources and decreases in air quality.

Recreational pressure

25. With regard to potential increased pressure on the designated sites from additional recreational demand, it is not anticipated that this will have a significant effect as all are approximately 30 plus minutes from the centre of the Borough, and there are a number of alternative, closer open spaces available to residents. The only site with a specific zone of influence in relation to recreational activity (Epping Forest SAC), is more than the recommended 6.2km from the Barnet boundary. This HRA report has applied a precautionary 7km ZOI to the other designated sites for recreational impact. All sites are outside of this distance except a small part of the most southern designation for Lee Valley.

26. Localised recreational impacts on the Lee Valley (such as cat predation, construction impacts) are highly unlikely to occur from development in Barnet due to the distances involved. The Lee Valley management plan anticipates visitor numbers increasing from 70,000 per annum to peak at around 180,000 per annum during the Barnet Plan period. The increase in recreational visitors from Barnet is unlikely to contribute significantly within these numbers and it is considered that the increased development in Barnet would not result in likely significant effects on Lee Valley SPA and Ramsar.
27. Open spaces within Barnet are afforded protection through the Local Plan; therefore, there is less need for residents to use open spaces outside of the Borough. Draft policy ECC04 requires new and improved open space provision to meet the needs of new development, reducing potential impact on sites outside of the plan area.

Water quantity and water quality

28. The screening process needs to consider whether the anticipated increase in population for Barnet could result in additional demand on water resources, which could place pressure on the reservoirs that form part of the Designated sites, particularly Lee Valley. The majority of the borough lies within the Brent River and Lakes water catchment area, which is not hydrologically connected to the Lee Valley. Due to distance, lack of features susceptible to impacts from water and lack of hydrological connectivity, no effects are considered likely in relation to Wormley Hoddesdonpark Wood SAC, Epping Forest SAC, Richmond Park SAC and Wimbledon Common SAC. However, a smaller area to the east of Barnet lies within the Lee Lower Rivers and Lakes water catchment area.
29. Thames Water's Shape Your Water Future (2020) ¹⁷ sets out a strategy for water management to 2100, including the provision of water infrastructure for increased population growth. The HRA for the strategy concludes there are no likely significant effects on Lee Valley SPA. Growth within the Barnet Plan is within the levels anticipated by the Thames Water HRA.
30. Draft policy ECC02 aims to protect water infrastructure within Barnet, which will ease pressure on reservoirs outside the Borough. Water scarcity and water quality is a London wide issue. Within the London Plan (2021) Policy SI 5 Water Infrastructure sets out strategic requirements in relation to water quality and Policy SI 17 Protecting and Enhancing London's Waterways provides protection for water quality, Policy ECC02 also requires new developments to demonstrate compliance with water efficiency standards (as set out in Barnet's Sustainable Design and Construction SPD) and to naturalise a watercourse where possible. Therefore, it is unlikely that the draft Local Plan will have a significant impact on the Designated sites due to increased water consumption.

Atmospheric pollution and air quality

31. An increase in population in Barnet could also result in increased levels of atmospheric pollution through emissions created by the construction and occupation of development or from potential increased vehicle journeys created as a result. Best practice requires

¹⁷ [Thames Water \(2020\) Shape Your Water Future, Our Water Resources Management Plan 2020 – 2100](#)

consideration of the impact of plan proposals that would increase traffic on roads within 200m of a designated site. Within the Barnet Plan, this would include roads that could impact Wormley Hoddesdonpark Wood SAC, Epping Forest SAC and the Lee Valley SPA.

32. The NE Site Improvement Plans (SIP¹⁸) for each of these designated sites notes that atmospheric pollution exceeds recommended levels at the site. Impacts recorded on the designated sites and assets vary within the SIPs with particular pressure on Epping Forest SAC. The SIPs require monitoring of atmospheric pollution and further investigation.
33. Evidence^{19,20} prepared in support of the Barnet Plan notes that car use declined within the Borough by 9% in the five years to 2016. Over 45% of journeys within the Borough are made by public transport, cycling or walking. It is likely that this shift from car use will continue through the Plan Period, with an associated decline in atmospheric pollution²¹.
34. Evidence prepared in support of the London Plan 2021²² modelled the strategic impact of the Mayor's Transport Strategy and the London Plan (2021). It concluded that overall trips would increase, car share would reduce, congestion would increase and atmospheric pollution would decrease. Specially, in reference to emissions it states that..."With the planned Ultra Low Emission Zone in place in 2019 in Central London, together with improvements to vehicular technology, levels of the four key emissions (CO₂, PM_{2.5}, PM₁₀ and NO_x) are expected to fall from 2013 to 2041. The [Mayor's Transport Strategy] scenario, could deliver further significant reductions in the four key emissions."
35. The draft Local Plan has strong policies throughout the plan to limit private vehicular traffic and promote more sustainable travel modes, including active travel. In addition, draft policy TRC01 requires transport assessments and travel plans for major developments and construction management and/or delivery and servicing plans to control vehicle movements that will have an impact on air pollution. Draft policies also aim to reduce air pollution through other means such as green infrastructure, public realm and mixed-use development that reduces the need to travel.
36. It is unlikely that the draft Local Plan will have a significant impact on the Designated sites due to increased levels of atmospheric pollution, taking consideration of the distance to the designated sites from proposed development sites in Barnet, the anticipated decline in atmospheric pollution at a strategic level and the policies within the Barnet Local Plan.

In-combination Effects

¹⁸ Links are within Table 3 of this document

¹⁹ https://www.barnet.gov.uk/sites/default/files/evidence_paper_update_june_2021.pdf

²⁰ https://www.barnet.gov.uk/sites/default/files/strategic_transport_assessment_2021.pdf

²¹ Current monitoring of the A406 within Barnet has seen a decline in atmospheric pollution <https://www.barnet.gov.uk/environmental-problems/air-quality/air-quality-monitoring>

²² [strategic transport modelling report.pdf \(london.gov.uk\)](https://www.london.gov.uk/sites/default/files/strategic_transport_modelling_report.pdf)

37. Under the Habitats Regulations 2017 as amended, there is a requirement to carry out an Appropriate Assessment where “a land use plan is likely to have a significant effect on a designated site (...) (either alone or in combination with other plans or projects) and is not directly connected with or necessary to the management of the site”¹.
38. In order to assess whether there is likely to be any ‘in-combination effects’, this section of the HRA has identified other plans and projects, outside of the Barnet Draft Local Plan, may affect Designated sites. There are a large number of plans/ projects which could be considered, however, this stage of the screening will only focus on planned spatial growth within neighbouring boroughs and districts that have an adopted local plan or draft plans that in the process of being adopted.
39. The purpose of this task is to identify any components that could have an impact on the designated site network scoped-in to the HRA of the draft Local Plan e.g. proposals for development near to these sites which could have implications in terms of increased traffic, water use or recreational disturbance. The potential for the effects of these plans or projects to combine with the effects of the draft Local Plan has been considered as part of the screening assessment below and will continue to be assessed where necessary during further iterations of the HRA (if required).
40. The London Plan and associated documents identified a number of issues in the London region that are likely to have detrimental environmental impacts if not addressed. Trends relating to climate change are also likely to have significant impacts for biodiversity which could affect the integrity of Designated Sites:
 - a. London has seen significant population growth, and current population projections suggest that this is likely to continue with it anticipated that there will be an additional 3 million people in the city by 2050. It is predicted that the population will reach 10.5 million by 2041.
 - b. London’s streets are some of the most congested in the world. Lifestyle changes, increased use of internet deliveries, Sunday shopping and the rapidly growing night-time economy has caused changes in travel and congestion patterns in recent years.
 - c. At present, 800,000 people commute into work. This is anticipated to increase to more than 1 million by 2041. In addition, it is anticipated that trips made by Londoners will increase from 20 million to 25 million per day between 2011 and 2041.
 - d. In 2016, London has a total of 5.7 million workforce jobs; this is projected to grow to 5.8 million by 2021, 6.3 million by 2031 and 6.7 million by 2041.
 - e. London had a total of 5.7 million workforce jobs, which is set to increase to 5.8 million by 2021, 6.3 million by 2031 and 6.7 million by 2041. Provision for employment growth will also lead to additional recreational demand from workers. All of the identified European Sites are popular destinations for visitors from London and from further afield.
 - f. Rising levels of freight and private hire traffic in London.
 - g. There are 64 waterbodies in London, of these, none are rated as ‘very good.’
 - h. Exposure to NO₂ in London has been declining, however, it is estimated that by 2020, 500,000 people will still be exposed to NO₂ levels above the EU limit value.
 - i. The probability of flooding in London is increasing with climate change.
 - j. The relatively dry nature of the South East combined with the high population density, especially within London, means that water resources are under significant pressure. This pressure is exacerbated by London not only having one of the highest rates of water use on the country but also having one of the highest rates of leakage from the water supply distribution network.

k. There are six current and anticipated effects of climate change for London: hot summers, more intense rainfall, more frequent and intense heatwaves, changes in seasonality of rainfall, increased urban heat island effect and sea level rise.

41. The HRA for the draft London Plan²³ concluded that “there are sufficient protective mechanisms in place to ensure that the growth objectives of the London Plan can be delivered without a likely significant effect on Designated sites either alone or in combination with other plans and projects”.

42. Appendix 2 lists the relevant council plans that were reviewed, outlining the components of each plan that could have an impact on nearby designated sites and considering the findings of the accompanying HRA work (where available):

- Borough of Harrow
- Borough of Brent
- Borough of Camden
- Borough of Haringey
- Borough of Enfield
- Hertsmere Borough Council

43. The proposals within the draft Barnet Local Plan are consistent with the assessments in support of the above Local Plans.

Conclusion

44. The Stage 1 assessment of the draft Barnet Local Plan concludes that the Plan has no likely significant effects on the integrity of designated sites, either alone or in combination with other plans or projects.

Appendix 1 – Guidance used to inform the HRA

The HRA Screening of the Barnet Draft Local Plan has been undertaken in line with current available guidance set out in the table below.

Document
Habitats regulations assessments: protecting a European site (Department for Environment, Food & Rural Affairs, Natural England, Welsh Government, and Natural Resources Wales, 24 February 2021)
Document Link: https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site#screening

²³ <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/london-plan-2021>

Assessment of plans and projects significantly affecting Natura 2000 sites – Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC, European Commission.

Document link: https://ec.europa.eu/environment/nature/natura2000/management/docs/art6/natura_2000_assess_en.pdf

Planning for the Protection of European Sites. Guidance for Regional Spatial Strategies and Local Development Documents. Department for Communities and Local Government (DCLG), August 2006.

Document link: <https://webarchive.nationalarchives.gov.uk/20120920055842/http://www.communities.gov.uk/documents/planningandbuilding/pdf/160442.pdf>

The Appropriate Assessment of Spatial Plans in England. A guide to why, when and how to do it. RSPB, August 2007.

Document link: http://ww2.rspb.org.uk/Images/spatialplansengland_tcm9-168180.pdf

Appendix 2: Plans with the potential for in-combination effects

Plans and supporting documents have been considered from Regulation 19 Stage, where there is reasonable certainty about levels of development that might come forward.

Regional Plans

London Plan (2021)

Status: On 29 January 2021 the Secretary of State wrote to the Mayor confirming that he is content for the London Plan to be formally published, with no further changes.

HRA: The July 2016 HRA of the London Plan concludes that there are sufficient protective mechanisms in place to ensure that the growth objectives of the London Plan can be delivered without an adverse effect on the integrity of European sites, either alone or in combination with other plans and projects. Updates to the HRA during the process of examination have not changed the outcomes of the assessments in relation to the Barnet Local Plan. There are no likely in-combination effects of the adopted London Plan with the Local Plan.

Local Plans and Strategies: Neighbouring Authorities

London Borough of Harrow: Core Strategy (2012); Development Management Plan (2013); Site Allocations Local Plan (2013)

Status: The adopted Local Plan is comprised of the Core Strategy, Development Management Plan and the Site Allocations Local Plan.
Planned growth: The adopted Core Strategy provides for 6,050 net additional dwellings over the period 2009 to 2026. The majority of new homes will be provided within the Harrow and Wealdstone Intensification Area, and remaining growth directed to town centres and strategic previously developed sites. The Core Strategy set a target to deliver 4,000 net additional new jobs over the plan period. It is anticipated that 3,000 of these jobs will be delivered within the Harrow and Wealdstone Intensification Area. HRA: The November 2011 HRA concluded that that no likely significant effect to the qualifying features of the European site would occur as a result of their growth/policies.

London Borough of Brent: Brent Local Plan 2019-2041

Status: The Brent Local Plan 2019-2041 was adopted by Full Council on 24 February 2022

Planned growth: The plan seeks grant planning permission to support the delivery of the Growth Areas, site allocations and appropriate windfall sites to provide a minimum 23,250 homes in the period 2019/20-2028/29 and a minimum of 46,018 homes in the period 2019/20-2040/41.

HRA: The HRA concludes that the Plan is unlikely to lead to any significant adverse effects (either alone or in combination) on any European Sites.

London Borough of Camden: Local Plan (2017)

Status: The Local plan was adopted in 2017 and sets out a vision to 2031.

Planned Growth: The plan seeks to meet Camden's objectively assessed needs, which include 16,800 additional homes, 695,000 sqm of office floorspace and 30,000sqm of retail floorspace. Development will take place throughout the borough but with the most significant growth expected to be delivered through a concentration of development in the growth areas of Kings Cross, Euston, Tottenham Court Road, Holborn, West Hampstead interchange and Kentish Town Road Regis Road.

HRA: The 2015 HRA concluded that that no likely significant effect to the qualifying features of the European site would occur as a result of their growth/policies. There are no relevant updates to the Camden Local Plan.

London Borough of Haringey: Strategic Policies 2013 (with alternations 2017) and Site Allocations (2017); Development Management DPD (2017)

Status: Haringey's development plan is currently made up of the Strategic Policies, Development Management Policies, Site Allocations and Tottenham Area Action Plan, alongside the London Plan.

Planned Growth: The strategy seeks to deliver 19,800 new net new homes over the plan period. In addition, the strategies forecasts that 23,800sqm of B class floorspace will be needed up to 2026.

HRA: The 2015 HRA concluded that the potential impact pathway of recreational pressure upon Epping Forest was screened out, both alone and in-combination with other projects or plans. Following assessment of Lee Valley SPA and Ramsar site, the potential impact pathway of disturbance (from recreational pressure), urbanisation, water abstraction, water quality and air quality were also screened out, both alone and in-combination with other projects or plans. The impact pathway of disturbance to avian features from construction activities is a residual impact pathway as development is proposed within close proximity to the SAC and Ramsar site. Provided Haringey's Alterations to Strategic Policies document provides clear measures to address potential disturbance to bird features resulting from construction activities, then Haringey's Alterations to Strategic Policies document can be screened from further assessment and no likely significant effects upon internationally designated sites will result, either alone or in combination with other projects or plans.

An updated IIA was produced in support of the new Local Plan and the consultation on this document closed in March 2021. There are no further updates on the Regulation 18 Plan at this time and therefore the assessment for the Barnet Plan considers the adopted Local Plan for Haringey.

London Borough of Enfield: Core Strategy (2010); Local Plan Policies map (2010)

Status: Enfield council's development framework is made up of the Core Strategy which was adopted in 2010 and provides a vision up to 2025. The Core Strategy is supported by the Local Plan Policies Map.

Planned Growth: The Core Strategy plans for 11,000 new homes over the planned period and a minimum of 6,000 new jobs. Large scale growth and regeneration will be focused in four broad locations – Central Leaside and North Enfield in the Upper Lee Valley, in addition to the area around the North Circular Road at New Southgate and the Boroughs major town centre – Enfield Town.

HRA: The Appropriate Assessment Screening Report determined that the baseline for the 2009 AA screening for the Core Strategy remains relevant and appropriate. The 2009 AA screening undertaken for the Core Strategy concluded that none of the policies were likely to have any significant adverse impacts on European sites. The IIA in support of the new Regulation 18 Plan was consulted on in September 2021. There are no significant changes for the Barnet Plan.

Hertsmere council: Core Strategy (2013); Elstree Way Corridor Area Action Plan (2015); Site Allocations and Development Management Policies Plan (2016); Policies Map

Status: The Hertsmere Local Plan is made up of four parts (listed above) and provides a vision up to the period 2017.

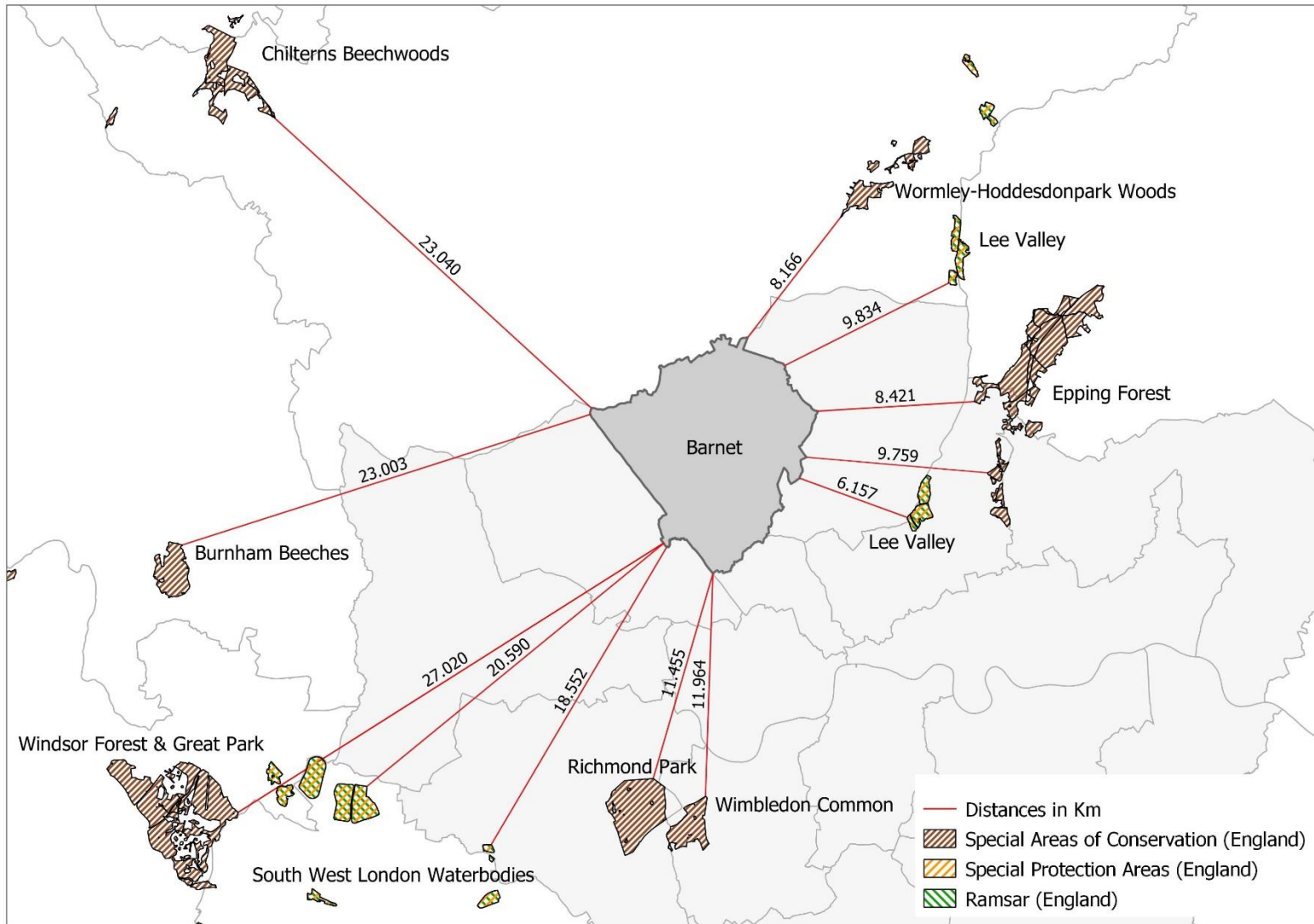
Planned Growth: The Core Strategy sets a target to deliver 3,900 new homes over the plan period (equating to 229 new homes per year). In addition, it is expected that approximately 2,700 new office jobs and 240 new warehousing jobs and 660 fewer industrial jobs over the plan period.

HRA: The HRA scoping report (2017) introduced the HRA process that will be undertaken in relation to the new Hertsmere Local Plan as it is prepared. This version of the Local Plan has now been set aside and the Council is proposing to restart the plan process from April 2022. The HRA Screening report for the Barnet Local Plan has considered the relevant information from the evidence documents prepared in support of the 'set-aside' Hertsmere Local Plan Review.

Appendix 3: Factors contributing to site integrity

Factors contributing to site integrity	Explanation	Source
Qualifying feature	Qualifying features outline the habitats and species i.e. 'qualifying feature' for which the sites have been awarded EC conservation status. It is these qualifying features (primary and secondary) which the HRA must safeguard.	<p>Information on qualifying features is available within the Natura 2000 and Ramsar Forms (available here: http://archive.incc.gov.uk/ProtectedSites/)</p> <p>This information is also contained within the Conservation Objectives for European Sites (available here: http://publications.naturalengland.org.uk/category/6490068894089216)</p>
Conservation objectives	The qualifying features form the basis of Natural England's Conservation Objectives for European Sites which provide additional information about each of the designated sites and provide a framework which inform the HRA. In addition, they can be used to inform any measure necessary to conserve or restore the European Site and/or to prevent the deterioration or significant disturbance of its qualifying feature.	Information on conservation objectives can be found here: http://publications.naturalengland.org.uk/category/6490068894089216
Current pressures and threats	Threats and pressures help inform the HRA's identification of the types of effects development brought forward by the draft Local Plan may have on the qualifying features of the designated sites.	This information is obtained from Site Improvement Plans produced by Natural England (available here: http://publications.naturalengland.org.uk/category/5458594975711232)
Condition	All Natura 2000 sites in England are also nationally designated as SSSIs and therefore information obtained from Natural England's review of SSSI condition is available for all identified sites.	This information can be obtained from Natural England Designated sites View (available here: https://designatedsites.naturalengland.org.uk/SiteSearch.aspx) Reference has also been made to individual site management plans where condition is specifically referred to.

Appendix 4 – Map of designated site network in proximity to London Borough of Barnet



Appendix 5 – Correspondence with Natural England

Date: 20 June 2022
Our ref: 394715
Your ref: Barnet Local Plan – HRA Screening

London Borough of Barnet

BY EMAIL ONLY



Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Ms Thomson,

Barnet Local Plan – HRA Screening Report

Thank you for your consultation request on the above dated and received by Natural England on 17th June 2022.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

On the basis of the material supplied with the consultation, it is our advice that the relevant statutory designated sites have been considered within the HRA screening report, alongside the likely 'pathways' that may impact them. Where potential impact pathways have been identified, we agree with the justification given in the report as to why no likely significant effects are likely as a result of the local plan either alone or in-combination with other plans and projects. We therefore agree with the conclusions presented in the screening report regarding the HRA.

For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk

Yours sincerely

Isabella Jack
Sustainable Development Adviser
Thames Solent Area Team, Natural England