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London Borough of Croydon
Proposed Submission Core Strategy
Habitats Regulations Assessment Screening

Screening Report

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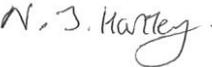
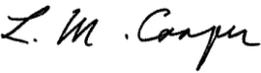


London Borough of Croydon

Proposed Submission Core Strategy

Habitats Regulations Assessment Screening

Screening Report

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Report No	50008-LN01157-LNR-01	
Date	15 July 2011	

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ABBREVIATIONS

cSAC	Candidate Special Area of Conservation
FCS	Favourable Conservation Status
HRA	Habitats Regulations Assessment
LDF	Local Development Framework
pSPA	Potential Special Protection Area
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SCI	Site of Community Importance
SEA	Strategic Environmental Assessment
SPA	Special Protection Area

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1 INTRODUCTION AND PURPOSE

1.1 Introduction

Croydon Council is currently preparing its Core Strategy to guide development in the borough over the next 15 to 20 years. The Core Strategy will set out the long term spatial vision and strategy for the borough. It will provide a framework for making decisions on planning applications and to guide development to suitable locations within the borough.

This Habitats Regulations Assessment (HRA) screening document was initially started during the preparation of the Issues and Options (2009) document and subsequently updated during the preparation of the Proposed Submission Core Strategy. This approach was taken to ensure that all options, policies and proposals in the Core Strategy will avoid significant adverse impacts on the protected European sites that lie within a 15km radius of the borough boundary. Policies and recommendations for the protection of European sites are integral to Croydon's Core Strategy.

1.2 Background to the Habitats Regulations Assessment

Under Article 6 of the Habitats Directive (and Regulation 61 of the Conservation of Habitats and Species Regulations 2010), an assessment is required where a plan or project may give rise to significant effects upon a Natura 2000 site (also known as 'European site').

Within Croydon there are no European sites, however, within a 15km radius of the borough boundary there are three sites which form part of the Natura 2000 network that could potentially be affected by the Core Strategy. Natura 2000 is a network of areas designated to conserve natural habitats and species that are rare, endangered, vulnerable or endemic within the European Community. This includes Special Areas of Conservation (SAC), designated under the Habitats Directive for their habitats and/or species of European importance, and Special Protection Areas (SPA), classified under Directive 2009/147/EC on the Conservation of Wild Birds (the codified version of Directive 79/409/EEC as amended) for rare, vulnerable and regularly occurring migratory bird species and internationally important wetlands.

In addition, it is a matter of law that candidate SACs (cSACs) and Sites of Community Importance (SCI) are considered in this process; furthermore, it is Government policy that sites designated under the 1971 Ramsar Convention for their internationally important wetlands (Ramsar sites) and potential SPAs (pSPAs) are also considered.

The requirements of the Habitats Directive are transposed into UK law by means of the Conservation of Habitats and Species Regulations 2010¹.

Paragraph 3, Article 6 of the Habitats Directive states that:

'Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to paragraph 4 (see below), the competent national authority shall agree to the plan or project only having ascertained that it will not adversely affect

¹ SI 2010/490

the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public’.

Paragraph 4, Article 6 of the Habitats Directive states that:

‘If, in spite of a negative assessment of the implications for the site and in the absence of alternative solutions, a plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of social or economic nature, the Member State shall take all compensatory measures to ensure that the overall coherence of Natura 2000 is protected. It shall inform the Commission of the compensatory measures adopted.’

The overarching aim of HRA is to determine, in view of a site’s conservation objectives and qualifying interests, whether a plan, either in isolation and/or in combination with other plans, would have a significant adverse effect on the European site. If the Screening (the first stage of the process, see section 2.1 for details) concludes that significant adverse effects are likely, then Appropriate Assessment must be undertaken to determine whether there will be adverse effects on site integrity.

1.3 Legislation and Guidance

This HRA screening report has drawn upon the following legislation and guidance:

- The Conservation of Habitats and Species Regulations 2010.
- Department for Communities and Local Government (2006) Planning for the Protection of European Sites: Appropriate Assessment. Guidance for Regional Spatial Strategies and Local Development Documents.
- European Commission, Managing Natura 2000 sites: The provisions of Article 6 of the Habitats Directive 92/43/EEC.
- European Commission, Guidance document on Article 6(4) of the Habitats Directive 92/43/EEC.

2 THE HABITATS REGULATIONS ASSESSMENT PROCESS

This section provides an outline of the stages involved in HRA and the specific methods that have been used in preparing this report.

2.1 Stages in HRA

The requirements of the Habitats Directive comprise four distinct stages:

Stage 1: Screening is the process which initially identifies the likely impacts upon a European site of a project or plan, either alone or in combination with other projects or plans, and considers whether these impacts may have a significant effect on the integrity of the site's qualifying habitats and/or species. It is important to note that the burden of evidence is to show, on the basis of objective information, that there will be no significant effect; if the effect may be significant, or is not known, that would trigger the need for an Appropriate Assessment. There is European Court of Justice case law to the effect that unless the likelihood of a significant effect can be ruled out on the basis of objective information, and adopting the precautionary principle, then an Appropriate Assessment must be made.

Stage 2: Appropriate Assessment is the detailed consideration of the impact on the integrity of the European site of the project or plan, either alone or in combination with other projects or plans, with respect to the site's conservation objectives and its structure and function. This is to determine whether or not there will be adverse effects on the integrity of the site. This stage also includes the development of mitigation measures to avoid or reduce any possible impacts.

Stage 3: Assessment of alternative solutions is the process which examines alternative ways of achieving the objectives of the project or plan that would avoid adverse impacts on the integrity of the European site, should avoidance or mitigation measures be unable to cancel out adverse effects.

Stage 4: Assessment where no alternative solutions exist and where adverse impacts remain. At Stage 4, an assessment is made with regard to whether or not the development is necessary for imperative reasons of overriding public interest (IROPI). If it is, this stage also involves detailed assessment of the compensatory measures needed to protect and maintain the overall coherence of the Natura 2000 network.

2.2 Applying HRA to the Core Strategy

The HRA process should be applied to all aspects of the Core Strategy that could have potential impacts upon a European site. At the Proposed Submission stage of the Core Strategy process, this involves assessment of the two options and assessment of the Strategic Policies.

Owing to its strategic nature, HRA of the Core Strategy is based more on an assessment of the broad policy implications on European sites than the more detailed HRA normally undertaken for individual projects (where a more comprehensive and empirical understanding of ecological impacts is possible). Nevertheless, where the screening stage of a policy-level HRA suggests that significant effects on one or more European sites are likely, the Appropriate Assessment stage will need to be completed, and this will need to demonstrate 'beyond reasonable scientific doubt' that the implementation of the plan will not lead to adverse effects on the integrity of any of the European sites.

2.3 Definition of Significant Effects

The critical part of the HRA screening process is determining whether the Core Strategy is likely to have a significant effect on European sites and, therefore, if it will require an Appropriate Assessment. Judgements regarding significance should be made in relation to the qualifying interests for which the site is of European importance and also its conservation objectives. A useful definition of significant effects is provided in Welsh planning guidance² which can be drawn upon in this case:

'...likely means readily foreseeable not merely a fanciful possibility; significant means not trivial or inconsequential but an effect that is potentially relevant to the site's conservation objectives'.

2.4 In-Combination Effects

As outlined in section 2.1, it is necessary for HRA to consider in-combination effects with other plans and projects. Plans under consideration may range from spatial planning documents produced by the Greater London Authority, relevant local authority Development Plan documents down to sector specific strategic plans on such topics as regeneration. A review has been undertaken of plans and projects with the potential for an in-combination effect with the Core Strategy which are listed in Table 2-1.

2

http://new.wales.gov.uk/docrepos/40382/epc/planning/403821/403827/40382/860788/Final_Copy_Consultation_Doc1.pdf?lang=en

Table 2-1 Plans and Projects Considered for In-Combination Effects

Authority	Relevant Plan/Project
Greater London Authority	<p>The London Plan Spatial Development Strategy for Greater London, Consultation draft replacement plan, October 2009 (minor alterations December 2009 and September 2010)</p> <p>The London Plan is intended to be the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20–25 years. The document that brings together the geographic and locational (although not site specific) aspects of the Mayor’s other strategies. It also sets the framework for the development and use of land in London, linking in improvements to infrastructure and is an essential part of achieving sustainable development, a healthy economy and a more inclusive society in London.</p>
Greater London Authority	<p>The London Plan - Sub Regional Development Framework – South London (2006)</p> <p>The South London Sub Regional Development Framework outlines the structural changes facing South London and highlights the potential of its town centres, Croydon Town Centre Opportunity Area and the South Wimbledon/ Colliers Wood ‘Area for Intensification’, as well as identifying other potential areas for growth and regeneration.</p>
London Boroughs of Sutton, Merton, Croydon and Royal Kensington	<p>South London Waste Plan (2011)</p> <p>The South London Waste Plan provides a planning framework for the management of all waste produced in the partner boroughs. It deals with waste from households, businesses and industry. The Waste Plan forms part of each South London borough’s Local Development Framework (LDF).</p>
Surrey County Council	<p>Surrey Waste Plan Adopted May 2008 (subsequently amended by order of the High Court on 5 March 2009)</p> <p>The Surrey Waste Plan is a generic term given to the following waste development plan documents:</p> <ul style="list-style-type: none"> ▪ Core Strategy; ▪ Waste Development; ▪ Waste Development Control Policies; and ▪ Proposals Map.
London Borough of Sutton	<p>Core Planning Strategy 2009</p> <p>The Core Planning Strategy sets out the Council’s long-term vision, spatial strategy and core policies for shaping the future development of the Borough and managing change over the next 15 years in line with the principles of sustainable development.</p>
London Borough of Merton	<p>Submission Core Planning Strategy 2010</p> <p>The Core Planning Strategy sets out the Council’s long-term vision, spatial strategy and core policies for shaping the future development of the Borough and managing change over the next 15 years in line with the principles of sustainable development.</p>
London Borough of Lambeth	<p>Core Strategy Adopted 2011</p> <p>The Core Planning Strategy sets out the Council’s long-term vision, spatial strategy and core policies for shaping the future development of the Borough and managing change over the next 15 years in line with the principles of sustainable development.</p>
Mole Valley Council	<p>Core Strategy Adopted October 2009</p> <p>The Core Strategy is one of a series of 'Local Development Documents' that together make up the LDF for Mole Valley. The Core Strategy is the first of these documents that the Council prepared, and the most important, setting out how the District is expected to evolve over a period of almost 20 years to 2026.</p>

Authority	Relevant Plan/Project
Tandridge District Council	<p>Core Strategy Adopted 15 October 2008</p> <p>The Core Planning Strategy sets out the Council's long-term vision, spatial strategy and core policies for shaping the future development of the Borough and managing change over the next 15 years in line with the principles of sustainable development.</p>
Richmond Upon Thames Council	<p>Core Strategy Adopted April 2009</p> <p>The Core Planning Strategy sets out the Council's long-term vision, spatial strategy and core policies for shaping the future development of the Borough and managing change over the next 15 years in line with the principles of sustainable development.</p>
Reigate and Banstead Council	<p>Core Strategy for the Borough of Reigate and Banstead 2010</p> <p>The Core Strategy is the spatial strategy for the borough to 2026 and contains:</p> <ul style="list-style-type: none"> ▪ A spatial vision setting out how the borough is expected to change over the period of the strategy; ▪ A set of spatial objectives outlining the main policy directions to help realise the spatial vision; ▪ A series of strategic policies to address the vision and objectives; and ▪ An implementation and monitoring section including indicators and targets.
Bromley Council	<p>Core Strategy Issues Document 2011</p> <p>Bromley's Core Strategy will be the overarching planning document within the LDF. A Core Strategy Issues Document has been agreed by the Council's Executive for consultation with local residents and the wider community which runs till 11 July 2011. This sets out a vision and objectives for the Borough and outlines key issues for consideration when the next stage of the strategy is being prepared.</p>
London Borough of Wandsworth	<p>Core Strategy Adopted October 2010</p> <p>The Core Strategy sets out the Council's spatial vision, strategic objectives and spatial strategy on how the borough should develop over the next 15 years along with core policies and information on monitoring and implementation.</p>
Kingston Upon Thames Council	<p>Submission Core Strategy May 2011</p> <p>The Core Strategy is part of Kingston's Local Development Framework and sets out the vision, objectives and policies for managing future growth, change and development within the Borough for at least the next 15 years. The Core Strategy will replace a number of policies in the Unitary Development Plan (2005).</p>

Only the Core Strategies of authorities with a European site or adjacent to Croydon's boundary (within 15km) have been examined. It should be noted that in-combination effects only require consideration where the plan or project being assessed has an impact, whether significant or not. A conclusion of 'Zero Effects' negates the possibility of in-combination effects.

2.5 Mitigation Measures

In preparing this report, consideration has been given to potential avoidance and mitigation measures which would serve to avoid adverse effects on the integrity of European sites, for example the provision of specific clauses within the Core Strategy that may prevent effects occurring.

3 THE EUROPEAN SITES

Three European sites have been identified within the area that could be affected by the Core Strategy. Only those sites within a 15km radius of the borough were considered. A 15km radius was chosen as a precautionary measure, to ensure that all potentially affected European sites were included in the screening process, in accordance with good practice in the UK. A list of the sites together with their status and location is presented in Table 3-1.

Table 3-1 Summary of European sites

Name of Site	Identification Number	Status
Mole Gap to Reigate Escarpment	UK0012804	SAC
Wimbledon Common	UK0030301	SAC
Richmond Park	UK00030246	SAC

Table 3-2 provides further information regarding the European sites including current conditions, threats and the results of the 2011 condition survey.

The boundaries of the European sites can be found on Figure 1, presented in Appendix B.

3.1 Conservation Objectives of the European Sites

Under Regulation 35(3) of the Conservation of Habitats and Species Regulations 2010 the appropriate statutory nature conservation body (in this case Natural England) has a duty to communicate the conservation objectives for a European site to the relevant/competent authority responsible for that site. The information provided under Regulation 35 must also include advice on any operations which may cause deterioration of the features for which the site is designated.

The conservation objectives for a European site are intended to represent the aims of the Habitats and Birds Directives in relation to that site. To this end, habitats and species of European Community importance should be maintained or restored to 'favourable conservation status' (FCS), as defined in Article 1 of the Habitats Directive below:

The conservation status of a natural habitat will be taken as 'favourable' when:

- Its natural range and the area it covers within that range are stable or increasing;
- The specific structure and functions which are necessary for its long term maintenance exist and are likely to continue to exist for the foreseeable future; and
- Conservation status of typical species is favourable as defined in Article 1(i).

The conservation status of a species will be taken as favourable when:

- Population dynamics data on the species concerned indicate that it is maintaining itself on a long-term basis as a viable component of its natural habitats;
- The natural range of the species is neither being reduced nor is likely to be reduced for the foreseeable future; and
- There is, and will probably continue to be, a sufficiently large habitat to maintain its populations on a long-term basis.

Guidance from the European Commission³ indicates that the Habitats Directive intends FCS to be applied at the level of an individual site, as well as to habitats and species across their European range. Therefore, in order to properly express the aims of the Habitats Directive for an individual site, the conservation objectives for a site are essentially to maintain (or restore) the habitats and species of the site at (or to) FCS.

Natural England has provided the Conservation Objectives for Wimbledon Common SAC, Richmond Park SAC and Mole Gap to Reigate Escarpment SAC. These are summarised in Appendix A.

³ Managing Natura 2000 sites: the provisions of Article 6 of the Habitats Directive 92/43/EEC. (European Commission 2000)

Table 3-2 European sites that could be adversely affected by Croydon's LIP2

Site Name	Qualifying Features		Current Conditions and Threats	Results of June 2011 SSSI Condition Survey	Key Ecosystem Factors
	Habitats	Species			
Mole Gap to Reigate Escarpment SAC	<p>Annex I habitats that are a primary reason for selection of this site:</p> <ul style="list-style-type: none"> ▪ Stable xerothermophilous formations with <i>Buxus sempervirens</i> on rock slopes (<i>Berberidion p.p.</i>) ▪ Semi-natural dry grasslands and scrubland facies: on calcareous substrates (<i>Festuco-Brometalia</i>) ▪ Semi-natural dry grasslands and scrubland facies: on calcareous substrates (<i>Festuco-Brometalia</i>) (important orchid sites) * Priority feature ▪ <i>Taxus baccata</i> woods of the British Isles * Priority feature <p>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:</p> <ul style="list-style-type: none"> ▪ European dry heaths ▪ <i>Asperulo-Fagetum</i> beech forests 	<p>Annex II species present as a qualifying feature, but not a primary reason for site selection:</p> <ul style="list-style-type: none"> ▪ Great crested newt <i>Triturus cristatus</i> ▪ Bechstein`s bat <i>Myotis bechsteinii</i> 	<p>Recreational pressure is high and requires management and monitoring. Most of the site is owned/run by conservation minded bodies but some areas of the site are under private smaller ownerships. These areas are most at threat from neglect and lack of appropriate grazing. Bechstein`s bats use the site throughout the year and work is underway to better understand the movements and requirements of bats on this site.</p>	<p>Area favourable 50.96%</p> <p>Area unfavourable but recovering 48.54%</p> <p>Area unfavourable no change 0.50%</p> <p>Area unfavourable declining 0%</p> <p>Area destroyed / part destroyed 0%</p>	<p>Extent</p> <p>Natural processes and structural development</p> <p>Regeneration potential</p> <p>Composition</p> <p>Species, habitats, structures and characteristics of the site.</p>
Wimbledon Common SAC	<p>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:</p> <ul style="list-style-type: none"> ▪ Northern Atlantic wet heaths with 	<p>Annex II species that are a primary reason for selection of this site:</p> <ul style="list-style-type: none"> ▪ Stag beetle <i>Lucanus cervus</i> 	<p>The site is located in an urban area and therefore experiences heavy recreational pressure which</p>	<p>Area favourable 0%</p> <p>Area unfavourable but recovering 94.99%</p> <p>Area unfavourable no</p>	<p>Population of species</p> <p>Number of old broadleaved trees</p> <p>Population structure of</p>

Site Name	Qualifying Features		Current Conditions and Threats	Results of June 2011 SSSI Condition Survey	Key Ecosystem Factors
	Habitats	Species			
	<p><i>Erica tetralix</i></p> <ul style="list-style-type: none"> European dry heaths 		<p>can result in damage to the sensitive heathland areas.</p> <p>The site is also sensitive to air pollution.</p>	<p>change 0%</p> <p>Area unfavourable declining 5.01%</p> <p>Area destroyed / part destroyed 0%</p>	<p>broadleaved trees</p> <p>Condition of old broadleaved trees</p> <p>-state of decay</p> <p>Quantity and size of fallen broadleaved dead wood</p> <p>Position and degree of exposure of old broadleaved dead trees and stumps. Condition and position of available dead timber.</p>
Richmond Park SAC	Not applicable	<p>Annex II species that are a primary reason for selection of this site:</p> <ul style="list-style-type: none"> Stag beetle <i>Lucanus cervus</i> 	<p>The site is surrounded by urban area and therefore experiences high levels of recreational pressure. The whole site has been declared a National Nature Reserve.</p>	<p>Area favourable 0%</p> <p>Area unfavourable but recovering 100%</p> <p>Area unfavourable no change 0%</p> <p>Area unfavourable declining 0%</p> <p>Area destroyed / part destroyed 0%</p>	<p>Population size of species</p> <p>Number of old broadleaved trees</p> <p>Population structure of broadleaved trees</p> <p>Condition of old broadleaved trees</p> <p>- state of decay</p> <p>Quantity and size of fallen broadleaved dead wood</p> <p>Position and degree of exposure of old broadleaved trees and</p>

Site Name	Qualifying Features		Current Conditions and Threats	Results of June 2011 SSSI Condition Survey	Key Ecosystem Factors
	Habitats	Species			
					stumps Condition and position of available dead timber.

4 SCREENING

4.1 Context

The Core Strategy is the key document in Croydon’s LDF. It sets out the spatial vision and plan for the future of the borough and how it will be delivered.

Croydon needs a spatial plan to rise to the challenges facing the borough, its communities and people over the next 20 years, and beyond. The borough has a need for new homes, jobs and the infrastructure to support them, whilst respecting the context of its metropolitan, district and local centres.

The Core Strategy provides a clear spatial vision, a suite of 11 strategic objectives and a set of eight strategic policies designed to guide development across Croydon, while also being sensitive to the environment, meeting the needs of local residents and addressing the economic and social costs of deprivation within communities.

4.2 Strategic Objectives of the Core Strategy

A set of Croydon specific strategic objectives have been established to form the link between the high level spatial vision for Croydon and the detailed strategy. They are the objectives needed to fulfil the spatial vision. The policies and delivery programme within the Core Strategy show how this can be achieved within the timescale of the Core Strategy. The strategic objectives are listed in Table 4-1.

Table 4-1: Strategic Objectives of the Croydon Core Strategy

Overarching Strategic Objective	Strategic Objectives
A Place of Opportunity	<ul style="list-style-type: none">▪ Strategic Objective 1: Establish Croydon as the premier business location in South London and the Gatwick Diamond.▪ Strategic Objective 2: Foster an environment where both existing, and new, innovative, cultural and creative enterprises can prosper.▪ Strategic Objective 3: Provide a choice of housing for people at all stages of life.▪ Strategic Objective 4: Reduce social, economic and environmental deprivation, particularly where it is spatially concentrated, by taking priority measures to reduce unemployment, improve skills and education and renew housing, community and environmental conditions.
A Place to Belong	<ul style="list-style-type: none">▪ Strategic Objective 5: Ensure that high quality new development both integrates, respects and enhances the borough’s natural environment and built heritage.▪ Strategic Objective 6: Provide and promote well designed emergency services, community, education, health and leisure facilities to meet the aspirations and needs of a diverse community.▪ Strategic Objective 7: Conserve and create spaces and buildings that foster safe, healthy and cohesive communities.
A Place with a Sustainable Future	<ul style="list-style-type: none">▪ Strategic Objective 8: Improve accessibility, connectivity, sustainability and ease of movement to, from and within the

Overarching Strategic Objective	Strategic Objectives
	<p>borough.</p> <ul style="list-style-type: none"> ▪ Strategic Objective 9: Ensure the responsible use of land and natural resources and management of waste to mitigate and adapt to climate change. ▪ Strategic Objective 10: Improve the quality and accessibility of green space and nature, whilst protecting and enhancing biodiversity. ▪ Strategic Objective 11: Tackle flood risk by making space for water, and utilising sustainable urban drainage systems

4.3 Alternative Options

The SA process encouraged the development of realistic and relevant alternatives during the preparation of the Core Strategy. The following set of options were considered in the Issues and Options Report:

- 1 **Option 1** - Growth proposed in Croydon is dispersed across the whole borough by making the most use of opportunity sites.
- 2 **Option 2** -New housing and commercial development is concentrated in Croydon Metropolitan Centre and along the A23 transport corridor, north to Norbury, and southward down through Waddon, Purley and Coulsdon.

In addition to these options an Option 3 'No plan / business as usual' option was considered to serve as a benchmark against which the growth options were assessed. However, Option 1 was described in the Issues and Options Report as 'developer-led, opportunistic approach' while Option 2 was described as a 'plan-led approach'. Option 1 therefore already represented a no plan approach and Option 3 was not considered further.

4.4 Screening of the Alternative Options

In order to determine which of the two options, if any, would be likely to have a significant effect on any of the three European sites, an initial screening exercise was carried out on the options.

The first part of the screening process requires consideration of the project or plan in respect of whether it is directly connected with or necessary for the management of European sites. 'Directly' in this context means solely conceived for the conservation management of a site⁴ and 'management' in this context refers to the management measures required in order to maintain in favourable condition the features for which the European site has been designated.

The Core Strategy is not directly connected with, or necessary for, the management of international nature conservation sites in the UK.

Results of the screening of the two alternative strategy options is summarised in Table 4-2.

⁴ It is possible to have a plan which contains a mix of conservation management and other objectives. In that case the non conservation management element of the plan may require assessment.

Table 4-2 Summary of the Strategy Option Screening

Alternative Core Strategy Option	Commentary on possible effects on European sites
<p>Option 1: Growth proposed in Croydon is dispersed across the whole borough by making the most use of opportunity sites</p>	<p>This option essentially means that growth in Croydon would be dispersed across the whole borough, making the most of opportunity sites. It is largely a developer led, opportunistic approach, limited by the capacity of existing infrastructure. Housing provision would be developer led therefore may not meet housing needs in terms of numbers, types or location. Housing may also be developed in areas which would require increased travel to jobs, schools and services. This could lead to adverse effects on local air quality. There would also be pressure to develop on Greenfield sites, as these sites are often easier and less costly to develop.</p> <p>It is unlikely that this option would lead to significant effects on any of the three European sites within 15 km of Croydon’s borough boundary as any adverse air quality effects likely to arise due to increased travel would be highly localised and development on Greenfield land would be a sufficient distance away as to not affect any European sites.</p>
<p>Option 2 -New housing and commercial development is concentrated on Croydon Metropolitan Centre and along the A23 transport corridor, north to Norbury, and southward down through Waddon, Purley and Coulsdon.</p>	<p>This option aims to concentrate new housing and commercial development in Croydon Town Centre and along the A23 transport corridor. This would result in high density development in a relatively small area of the borough. This option would also lead to increased pressure on facilities and services along the growth corridor due to population growth and would exacerbate current congestion problems.</p> <p>Again it is unlikely that this option would lead to significant effects on any of the three European sites within 15 km of Croydon’s borough boundary as adverse effects likely to arise from increased congestion is likely to be localised to the A23 corridor. However, if recreational facilities are under pressure within Croydon this may lead to people travelling outside the borough to find alternative facilities which may include the European sites. However, there are limitations to how far this would affect the European sites due to their distance from Croydon’s boundary and the presence of other closer recreational facilities.</p>

Screening of the alternative options determined that neither option has the potential to lead to significant adverse or significant beneficial effects on the European sites. Therefore from a HRA perspective selecting a ‘Preferred’ option is not clear. However, during the combined Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) process it was determined that neither growth options were appropriate on their own and that a modified growth strategy was required. This led to the development of the modified spatial strategy, which included development to be largely located within Croydon Town Centre but also within Croydon’s smaller district and local centres (the 16 Places of Croydon’). This new modified spatial strategy ultimately became Strategic Policy CS1 - The Places of Croydon.

Policy CS1 – The Places of Croydon has therefore been assessed as the ‘Preferred’ option in the remainder of this report.

4.5 Screening of the Preferred Option

Detailed screening of the Core Strategy is presented as two Screening Matrices in Tables 4-3 and 4-4.

The 'Preferred' option and supporting seven Strategic Policies set out in the Core Strategy were examined and the possible implications (without mitigation) with regard to the European sites were considered.

It should be noted that both direct effects and indirect effects were considered.

Following this process none of the European sites were considered likely to experience significant effects as a result of implementation of the Croydon Core Strategy. Tables 4-3 and 4-4 demonstrate that the distance of the borough from the three European sites and the commitment to establish a network of multi-functional open spaces ('Green Grid') within Croydon (which will provide alternative areas of open space) mean that significant effects are highly unlikely.

Table 4-3: Screening of the Core Strategy Strategic Policies on the Mole Gap to Reigate Escarpment SAC and Wimbledon Common SAC

Strategic Objective	Strategic Policy	Mole Gap to Reigate Escarpment SAC		Wimbledon Common SAC	
		Possible significant effect (X/✓)	Justification	Possible significant effect (X/✓)	Justification
Preferred Spatial Strategy	Policy CS1: The Places of Croydon	X	Mole Gap to Reigate Escarpment SAC is located approximately 6.0km from the borough boundary it is therefore unlikely that the Bechstein's Bat or Great Crested Newt populations at the SAC would be affected by Policy CS1 due its distance.	X	Wimbledon Common lies approximately 6.7km from the borough boundary. No direct impacts are anticipated on the integrity of Wimbledon Common SAC as a result of Policy CS1. The policy seeks to ensure development is directed to places with existing infrastructure (or areas where there is capacity to grow with further sustainable infrastructure) and to ensure growth creates a network of connected, sustainable and high quality places. This would ensure growth within the borough would not exacerbate current congestion problems and ensure that facilities are in place to meet the needs of an increased population.
A Place of Opportunity	Policy CS2: Homes	X	The Core Strategy aims to deliver a minimum of 13,300 homes between 2011 and 2021 in line with Draft Replacement London Plan and a further 6,900 homes between 2021 and 2031. This would lead to a large increase in the population of Croydon and may lead to an increase in visitors and recreational pressure at Mole Gap to Reigate Escarpment SAC. However, the SAC is located approximately 6.0km from the borough boundary, therefore it is unlikely visitor pressure and recreational pressure at the site would be significant as alternative open space is available within the	X	The Core Strategy aims to deliver a minimum of 13,300 homes between 2011 and 2021 in line with Draft Replacement London Plan and a further 6,900 homes between 2021 and 2031. This would lead to a large increase in the population of Croydon and may lead to indirect effects at Wimbledon Common SAC through increased visitors and recreational pressure. However, the SAC is located approximately 6.7km from the borough boundary, therefore it is unlikely that increased visitor and recreational pressure resulting from an increased population in

Strategic Objective	Strategic Policy	Mole Gap to Reigate Escarpment SAC		Wimbledon Common SAC	
		Possible significant effect (X/✓)	Justification	Possible significant effect (X/✓)	Justification
			borough and within walking distance.		Croydon would be significant. This is because there is alternative open space within the borough within closer proximity of new proposed development. Sports groups and regular dog walkers, are the main cause of concern at this SAC, with members of running groups using the Common for several hours each week, Croydon's Core Strategy through policies CS5 and CS7 aim to provide recreational facilities to meet the needs of the community and establish a 'Green Grid' network which would reduce the need to visit the SAC.
	Policy CS3: Employment	X	Ensuring employment development is primarily located within areas where the greatest concentration of new homes is proposed would reduce the need to travel by private car (approximately 8,000 new jobs to be created in Croydon's Metropolitan Centre). This over the long term could lead to beneficial effects for local air quality, however, these effects are likely to be highly localised. Due to the distance of Mole Gap to Reigate Escarpment SAC from Croydon's boundary (approximately 6.0km) effects are not anticipated to benefit the SAC.	X	Ensuring employment development is primarily located within areas where the greatest concentration of new homes is proposed (i.e. Croydon Metropolitan Centre) would reduce the need to travel by private car. This over the long term could lead to beneficial effects for local air quality, however, these effects are likely to be highly localised. Due to the distance of Wimbledon Common SAC from Croydon's boundary (approximately 6.7km) effects are not anticipated to benefit the SAC.

Strategic Objective	Strategic Policy	Mole Gap to Reigate Escarpment SAC		Wimbledon Common SAC	
		Possible significant effect (X/✓)	Justification	Possible significant effect (X/✓)	Justification
A Place to Belong	CS4 Urban Design and Local Character	X	This policy seeks to create a well-connected network of high quality, well-managed and well-maintained multifunctional hard and soft landscaped public spaces in addition to promoting walking and cycling, improving access to public transport and the 'Green Grid' whilst making a positive contribution to creating and preserving biodiversity. Therefore this policy would create alternative high quality accessible green spaces for new residents of Croydon to enjoy rather than have to travel outside of the borough and possibly use the SAC. However, due to the distance of the Mole Gap to Reigate SAC from the borough boundary (approximately 6.0km) it is unlikely that this would lead to significant beneficial effects although it would contribute to reducing pressure on the site.	X	It is very unlikely that this policy would lead to significant effects on the integrity Wimbledon Common SAC as the policy encourages the development of multi-functional soft landscaped public spaces, encourages walking and cycling and improving access to public transport and the 'Green Grid'. This would encourage new residents to use new accessible green spaces rather than having to travel outside the borough possibly increasing recreational / visitor pressure on the SAC. However, as the SAC is located approximately 6.7km from the borough boundary effects would not be significant
	CS5 Community Facilities and Education	X	Ensuring Community Facilities meet the requirement of the local population including accessible areas of open space may indirectly benefit Mole Gap to Reigate Escarpment SAC as residents would not need to travel outside the borough to visit high quality open space. However, due to the distance of the SAC from the borough boundary any effects are likely to be very minor.	X	This policy seeks to ensure Community Facilities meet the requirement of the local population including accessible areas of open space. This may indirectly benefit Wimbledon Common SAC as residents would not need to travel outside the borough to visit high quality open space. However, due to the distance of the SAC from the borough boundary any effects are likely to be very minor.

Strategic Objective	Strategic Policy	Mole Gap to Reigate Escarpment SAC		Wimbledon Common SAC	
		Possible significant effect (X/✓)	Justification	Possible significant effect (X/✓)	Justification
A Place with a Sustainable Future	CS6 Climate Change	X	This policy would not lead to any effects on the Mole Gap to Reigate Escarpment SAC as it simply aims to encourage sustainable construction and design practice in new development in Croydon. Due to the distance of the SAC from the borough boundary (6.0km) any beneficial effects likely to arise from this policy would be limited to the Croydon borough.	X	This policy encourages sustainable construction and design in Croydon. All effects are likely to be localised to Croydon with no direct impacts anticipated. The SAC is located too far away from Croydon (approximately 6.7km) for impacts to result in any indirect effects.
	CS7 Green Grid	X	This policy seeks to protect and enhance the natural environment of Croydon. It is also likely to provide suitable alternative open space for recreational use which could help alleviate pressure on the Mole Gap to Reigate Escarpment SAC. However, due to the distance of the SAC from the borough boundary effects are not likely to be significant.	X	As per the previous column, Policy CS7 seeks to protect and enhance the natural environment of Croydon which includes the provision of alternative open space for recreational use which could help alleviate pressure on Wimbledon Common SAC. However, due to the distance of the SAC from the borough boundary effects are not likely to be significant.
	CS8 Transport and Communication	X	Policy CS8 seeks to improve the provision and quality of sustainable transport within Croydon. This in the long term would reduce the number of private cars using the road network benefiting local air quality in the long term. It is not likely this benefit would be felt at the SAC due to its distance from Croydon's boundary (approximately 6.0km). Any changes in traffic and emissions are considered to be local effects.	X	This policy seeks to improve the provision and quality of sustainable transport within Croydon, which in the long term would reduce the number of private cars using the road network. This would also benefit local air quality and reduce diffuse air pollution in the borough in terms of traffic related pollutants. Although Wimbledon Common SAC is sensitive to air pollution it is not likely this benefit would be felt at the SAC due to its distance from Croydon's boundary

Strategic Objective	Strategic Policy	Mole Gap to Reigate Escarpment SAC		Wimbledon Common SAC	
		Possible significant effect (X/✓)	Justification	Possible significant effect (X/✓)	Justification
					(approximately 6.7km). Any changes in traffic and emissions are considered to be local effects.

Table 4-2: Screening of the Core Strategy on Richmond Park SAC

Strategic Objective	Strategic Policy	Richmond Park SAC	
		Possible significant effect (X/✓)	Justification
Preferred Spatial Strategy	Policy CS1: The Places of Croydon	X	Richmond Park lies approximately 9.5km from the borough boundary. No direct impacts are anticipated on the integrity of the SAC. The policy seeks to ensure development is directed to places with existing infrastructure (or areas where there is capacity to grow with further sustainable infrastructure) and ensure growth creates a network of connected, sustainable and high quality places. The policy would ensure that growth within the borough would not exacerbate current congestion problems and ensure that facilities are in place to meet the needs of an increased population.
A Place of Opportunity	Policy CS2: Homes	X	The distribution of ancient trees and saproxylic habitats is of key importance to stag beetles, and although the park experiences high visitor numbers, the impact from this pressure does not appear to be a major threat to these habitats. Trees in Richmond Park are also protected through individual management plans for veteran trees. The SAC is located approximately 9.5km from the borough boundary and therefore unlikely that increased visitor and recreational pressure resulting from an increased population in Croydon would be significant at the park.
	Policy CS3: Employment	X	Ensuring employment development is primarily located within areas where the greatest concentration of new homes is proposed will reduce the need to travel by private car. This over the long term could lead to beneficial effects on local air quality. These effects, however, are likely to be localised to the borough. Due to the distance of Richmond Park SAC from Croydon's boundary (approximately 9.5km) effects are not anticipated to benefit the SAC.
A Place to Belong	CS4 Urban Design and Local Character	X	It is unlikely that this policy would lead to any significant effects on the integrity Richmond Park SAC as the policy encourages the development of accessible open space (including the 'Green Grid') and encourages walking and cycling. This would provide new residents with alternative accessible green spaces rather than having to travel outside the borough possibly increasing recreational / visitor pressure on the SAC. However, as the SAC is located approximately 9.5km from the borough boundary effects would not be significant.
	CS5 Community Facilities and Education	X	This policy seeks to ensure any new Community Facilities meet the requirement of the local population including accessible areas of open space. This may indirectly benefit Richmond Park SAC as residents would not need to travel outside the borough to visit high quality open space. However, due to the distance of the SAC from the borough boundary any effects are likely to be very minor.

Strategic Objective	Strategic Policy	Richmond Park SAC	
		Possible significant effect (X/✓)	Justification
A Place with a Sustainable Future	CS6 Climate Change	X	Policy CS6 encourages sustainable construction and design in Croydon. All effects likely to arise would be localised to Croydon. As the SAC is located approximately 9.5km away no effects are anticipated.
	CS7 Green Grid	X	Policy CS7 seeks to protect and enhance the natural environment of Croydon which includes the provision of alternative open space for recreational use which could help alleviate pressure on Richmond Park SAC. However due to the distance of the SAC from the borough boundary effects are not likely to be significant.
	CS8 Transport and Communication	X	This policy seeks to improve the provision and quality of sustainable transport within Croydon, which in the long term would reduce the number of private cars using the road network. This would also benefit local air quality and reduce diffuse air pollution in the borough in terms of traffic related pollutants. It is not likely this benefit would be felt at the SAC due to its distance from Croydon's boundary (approximately 9.5km). Any changes in traffic and emissions are considered to be local effects.

4.6 In-Combination Effects

The HRA needs to consider not only the objectives and policies within the Core Strategy that may lead to significant impacts upon European sites on their own but also those that may have a significant impact in-combination with other plans. These may be spatial planning documents produced by the Greater London Authority or neighbouring planning authorities, see Table 2-1.

Within the Core Strategy the provision of housing in-combination with the provision of housing in other boroughs has the potential to increase visitor / recreational pressure at the European sites within 15km of Croydon's borough boundary. The housing provision targets in surrounding boroughs for additional housing are as follows:

- Merton 320 dwellings per annum*
- Wandsworth 1,280 dwellings per annum*
- Richmond upon Thames 245 dwellings per annum*
- Reigate and Banstead average of 188 homes per annum (2009 Appropriate Assessment⁵)
- Mole Valley provision for at least 3,760 between 2008 and 2026 (2009 Core Strategy⁶)
- Sutton 210 dwellings per annum*
- Lambeth 1,255 dwellings per annum*
- Bromley 565 dwellings per annum*
- Kingston upon Thames 375 dwellings per annum*
- Tandridge average of 125 dwellings per annum (Tandridge District: Statement of five year housing land supply at 1st April 2010)⁷

*Figures taken from the London Plan Spatial Development Strategy for Greater London, Consultation draft replacement plan, October 2009

Increased housing provision brings with it an increase in population, which would lead to an increase in the number of private cars using the roads and pressure on local recreational facilities. An increase in the number of private cars on the local road network could lead to a deterioration in local air quality which could lead to indirect adverse effects on the three European sites, particularly Wimbledon Common SAC as the site is sensitive to air pollution. However, each of the Core Strategies considered as part of the in-combination assessment seek to reduce the numbers of private cars using local road networks through the promotion of sustainable transport and siting new homes close to employment opportunities. It is therefore considered that there would be no in-combination effect on the European sites associated with reduced air quality.

Increasing the population in Croydon and surrounding boroughs could also increase visitor pressure and recreational use of the European sites. However, it is not considered that this would be significant. This is because each of the Core Strategies assessed as part of the in-

⁵ http://www.reigate-banstead.gov.uk/Images/Revised%20AA%20of%20Core%20Strategy%202012%20August%202009_tcm9-37311.pdf

⁶ http://www.mole-valley.gov.uk/media/pdf/p/t/Core_Strategy_Proposed_Submission_Document.pdf

⁷ http://www.tandridge.gov.uk/yourcouncil/documents/document_display.htm?pk_document=2612

combination assessment seek to provide areas of open space and recreational facilities to meet the needs of their individual populations which would provide alternative open space for new residents. Effects on the European sites are not considered significant.

It can therefore be concluded that the in-combination impact from neighbouring boroughs would not lead to significant effects on the European Sites.

5 CONCLUSION

Following the screening assessment undertaken in Tables 4-3 and 4-4 it was determined none of the European sites are considered likely to experience significant effects as a result of implementation of the Croydon Core Strategy. The screening assessment demonstrated that the distance of the borough from the three European sites and the commitment to establish a network of multi-functional open spaces ('Green Grid') within Croydon (which will provide alternative areas of open space) mean that significant effects are highly unlikely.

The in-combination assessment in section 4.6 also determined that significant effects arising in-combination with neighbouring authorities Core Strategies and housing provision identified in the London Plan would not lead to significant effects on the European sites.

Therefore Stage 2 Appropriate Assessment is not considered necessary.

Appendix A

Conservation Objectives

Conservation Objective	Comments
Mole Gap to Reigate Escarpment SAC	
<p>To maintain the designated habitats in favourable condition, which is defined in part in relation to a balance of habitat extent (extent attribute).</p>	<p>On this site favourable condition requires the maintenance of the extent of each designated habitat type, these include:</p> <ul style="list-style-type: none"> ▪ Broadleaved, mixed and yew woodland ▪ Calcareous grassland ▪ Breeding bird assemblage (Broadleaved, mixed and yew woodland) ▪ Lowland dry heath ▪ Open lichen habitat ▪ Juniper scrub (<i>Juniperus communis</i>) ▪ Starfruit (<i>Damasonium alisma</i>) (Nutrient rich ponds and pond margins) ▪ Members of plant assemblage within suite 1: <ul style="list-style-type: none"> - Green Hound's-tongue (<i>Cynoglossum germanicum</i>) - Wood Barley (<i>Hordelymus europaeus</i>) (Disturbed areas within woodland) ▪ Members of plant assemblage within suite 5: <ul style="list-style-type: none"> - Cut-leaved Germander (<i>Teucrium botrys</i>) - Ground Pine (<i>Ajuga chamaepitys</i>) (Disturbed or heavily managed grasslands, crumbly turf, path edges, etc.) ▪ Member of plant assemblage within suite 3: <ul style="list-style-type: none"> - Man Orchid (<i>Aceras anthropophorum</i>) (Scrub margins and grassland/scrub mosaics) ▪ Member of plant assemblage: <ul style="list-style-type: none"> - Greater dodder (<i>Cuscuta europaea</i>) (Broadleaved, mixed and yew woodland)
<p>To maintain the designated species in favourable condition, which is defined in part in relation to their population attributes.</p>	<p>On this site favourable condition requires the maintenance of the population of each designated species or assemblage, including:</p> <ul style="list-style-type: none"> ▪ Breeding woodland bird assemblage ▪ Lichen assemblage ▪ Great crested newt (<i>Triturus cristatus</i>) ▪ Juniper (<i>Juniperus communis</i>) ▪ Broad assemblage type: <ul style="list-style-type: none"> - F21 grassland & scrub matrix - Specific assemblage types: F111 sand & chalk and F112 open short sward ▪ Outstanding assemblage of invertebrates ▪ Broad assemblage type: <ul style="list-style-type: none"> - A21 wood decay - Specific assemblage types: A211 heartwood decay, A212 bark & sapwood decay & A213 fungal fruiting bodies ▪ Maternity colonies of Bechstein's bats ▪ Hibernating populations of Bechstein's bats

Conservation Objective	Comments
	<ul style="list-style-type: none"> ▪ Members of plant assemblage within suite 1 (vascular plant species of disturbed areas within woodland): <ul style="list-style-type: none"> - Green Hound's-tongue (<i>Cynoglossum germanicum</i>) - Wood Barley (<i>Hordelymus europaeus</i>) ▪ Members of plant assemblage within suite 3 (vascular plant species of scrub margins and grassland/scrub mosaics): <ul style="list-style-type: none"> - Man Orchid (<i>Aceras anthropophorum</i>) ▪ Member of plant assemblage: <ul style="list-style-type: none"> - Greater dodder (<i>Cuscuta europaea</i>) ▪ Members of plant assemblage within suite 5 (vascular plant species of disturbed/heavily managed grasslands, crumbly turf, path edges, etc.): <ul style="list-style-type: none"> - Cut-leaved Germander (<i>Teucrium botrys</i>) - Ground Pine (<i>Ajuga chamaepitys</i>) ▪ Members of plant assemblage: <ul style="list-style-type: none"> - Box (<i>Buxus sempervirens</i>) - Narrow-lipped Helleborine (<i>Epipactis leptochila</i>) - Large-leaved Lime (<i>Tilia platyphyllos</i>) - Stinking Hellebore (<i>Helleborus foetidus</i>) - Pale St. John's Wort (<i>Hypericum montanum</i>) - Coralroot (<i>Cardamine bulbifera</i>) - Meadow Clary (<i>Salvia pratensis</i>) - Early Gentian (<i>Gentianella anglica</i>) - Musk Orchid (<i>Herminium monorchis</i>) - Round-headed Rampion (<i>Phyteuma tenerum</i>) ▪ Starfruit (<i>Damasonium alisma</i>) (Which is within suite 10, making it a vascular plant species of nutrient rich ponds and pond margins.)
Richmond Park SAC	
To maintain the designated habitats in favourable condition, which is defined in part in relation to a balance of habitat extent (extent attribute).	<p>On this site favourable condition requires the maintenance of the extent of each designated habitat type including:</p> <ul style="list-style-type: none"> ▪ Acid grassland – lowland ▪ Lowland Parkland and Wood Pasture
To maintain the designated species in favourable condition, which is defined in part in relation to their population attributes.	<p>On this site favourable condition requires the maintenance of the population of each assemblage, these include:</p> <ul style="list-style-type: none"> ▪ Invertebrate assemblage ▪ Woodland <ul style="list-style-type: none"> - A211 heartwood decay - A212 bark & sapwood decay - A213 fungal fruiting bodies ▪ Stag beetle
Wimbledon Common SAC	
To maintain the designated features in	On this site favourable condition requires the maintenance of

Conservation Objective	Comments
favourable condition, which is defined in part in relation to a balance of habitat extents (extent attribute).	<p>the extent of each habitat type (either designated habitat or habitat supporting designated species). Habitat types include:</p> <ul style="list-style-type: none"> ▪ Acid grassland – lowland ▪ Dwarf Shrub Heath - lowland
To maintain the designated species in favourable condition, which is defined in part in relation to their population attributes.	<p>On this site favourable condition requires the maintenance of the population of each designated species or assemblage. The only designated species for this site is the population of stag beetle.</p>

Appendix B

Map of Habitats Regulations Screening

