

# **EUSTON AREA PLAN PROPOSED SUBMISSION DRAFT 2025**

## **HABITATS REGULATIONS ASSESSMENT (HRA) – SCREENING OPINION**

**October 2025**



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## 1. Introduction

- 1.1 The purpose of this Habitats Regulations Assessment is to assess the impacts of the Euston Area Plan (EAP) Proposed Submission Draft against the conservation objectives of a European Site and to ascertain whether it would adversely affect the integrity of that site.
- 1.2 European sites are known as the Natura 2000 network: 'The Natura 2000 network provides ecological infrastructure for the protection of sites which are of exceptional importance in respect of rare, endangered or vulnerable natural habitats and species within the European Community. These sites which are also referred to as European sites, consist of Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Offshore Marine Site (OMS) (there are no OMS designated at present).' There are no European sites designated within the London Borough of Camden.
- 1.3 The Habitats Regulations Assessment is a multi-stage process and planning authorities need to undertake a screening of plans that are likely to have a significant effect on European sites prior to their adoption in order to fulfil the requirements of the Directive in respect of the land use planning system.

### Policies and guidance

- 1.4 The Habitats Regulations 2017 (as amended) transposed the land and marine aspects of the Habitats Directive (Council Directive 92/43/EEC) into English and Welsh law.
- 1.5 The Conservation of Habitats and Species Regulations 2010 is a set of regulations in the UK that aim to protect and conserve natural habitats and species of European importance. The purpose of these regulations is to implement the requirements of the European Union's Habitats Directive and Birds Directive in the UK. Under the regulations, public authorities are required to assess the impact of their plans and projects on protected habitats and species and take appropriate measures to avoid or mitigate any negative impact.

Habitats Directive 1992 Article 6 (3) 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".*

Conservation of Habitats and Species Regulations 2010 state that:

*"A competent authority, before deciding to...give any consent for a plan or project which is likely to have a significant effect on a European site....shall make an appropriate assessment of the implications for the site in view of that site's conservation objectives...The authority shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site".*

- 1.6 Through the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019, parts of the 2017 Regulations have been altered. Most of these changes involved transferring functions from the European Commission to appropriate authorities in England and Wales. The overall thrust of the 2017 Regulations is unchanged and protections for sites and species continue to apply.

1.7 The National Planning Practice Guidance (NPPG) on Strategic Environmental Assessment and Sustainability Appraisal states at paragraph 3 that:

*“A plan or project may also require an appropriate assessment, as set out in the Conservation of Habitats and Species Regulations 2017 (as amended), if it is considered likely to have significant effects on a habitats site. A sustainability appraisal should take account of the findings of an appropriate assessment, if one is undertaken.”*

1.8 Department for Environment, Food and Rural Affairs (Defra) Guidance Habitats Regulations Assessments: Protecting a European site, 2021 (updated December 2023) sets out the requirement for undertaking an appropriate assessment of implications for European sites and European offshore marine sites. For Local Plans, the Local Planning Authority is required to undertake an HRA:  
“if the proposal might affect a European site. The effect of your proposal may depend on its location. It could be:

- on the site
- near the site
- some distance away, for example by causing air, water or noise pollution or affecting a feeding area used by one of the site’s designated species.”

1.9 The following European sites are protected by the Habitats Regulations and any proposals that could affect them will require an HRA:

- [Special Areas of Conservation](#) (SACs)
- [Special Protection Areas](#) (SPAs).

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

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

### **Purpose of this report**

1.11 This report is the Council’s Habitats Regulations Screening Assessment of the EAP Proposed Submission Draft, it sets out the findings of the screening assessment that was carried out to determine whether further work to Tasks 2 and 3 of a Habitats Regulations Assessment are required for the Euston Area Plan (EAP) Update.

1.12 This Habitats Regulations Assessment screening report will be submitted to the Secretary of State with the EAP Update document and other submission documents for consideration at the Independent Examination. The examination Inspector will consider the soundness of the EAP, using this Habitats Regulations Assessment as part of the evidence base. It will be published for comment alongside the Euston Area Plan Proposed Submission Draft.

1.13 The objective of this assessment is to identify any aspects of the EAP Proposed Submission Draft that would cause a likely significant effect on any relevant Natura 2000 sites, otherwise known as European sites, either in isolation or in combination with other plans and projects. These European sites are: Special Areas of Conservation (SACs) which protect habitats and Special Protection Areas (SPAs) which protect birds. Ramsar sites which protect wetlands should also be considered.

1.14 The Habitats Directive applies the ‘precautionary principle’ to European sites. This means that plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the site(s) in question. Plans and projects with predicted adverse effect on European sites may still be permitted if there are no alternatives to them and there are imperative reasons of overriding public interest as to why they should go ahead. In such cases, compensation would be necessary to ensure the overall integrity of the Natura 2000 network. The legislation sets out a multi-stage process. An initial analysis (screening) is undertaken in order to determine whether there are likely to be ‘significant effects’ (as in this report). If it is not possible to conclude that there will not be likely significant effects, then in order to ascertain whether or not a site(s) integrity will be affected, an appropriate ‘assessment’ should be undertaken of the plan or project in question.

1.15 It should be noted that the Council has previously undertaken an Habitats Regulations Assessment screening assessment of the EAP 2015, and for the draft Camden Local Plan in 2025 both of which concluded that the Plans were not considered likely to have significant effects on identified sites of European importance for habitats or species, or an adverse impact on the integrity of the sites. A HRA was also undertaken of the North London Waste Plan 2022, which concluded “Any potential harmful impacts on the nature conservation value of European sites that could arise from the implementation of the North London Combined Waste Plan can be avoided or mitigated.”

## 2. Methodology

2.1 The Department for Environment, Food and Rural Affairs (Defra) published guidance in February 2021 (updated in 2023) to assist ‘competent authorities’ in undertaking Habitats Regulations Assessment (hereafter referred to as the HRA guidance). This is outlined below.

### **(1) “Before you start an HRA”**

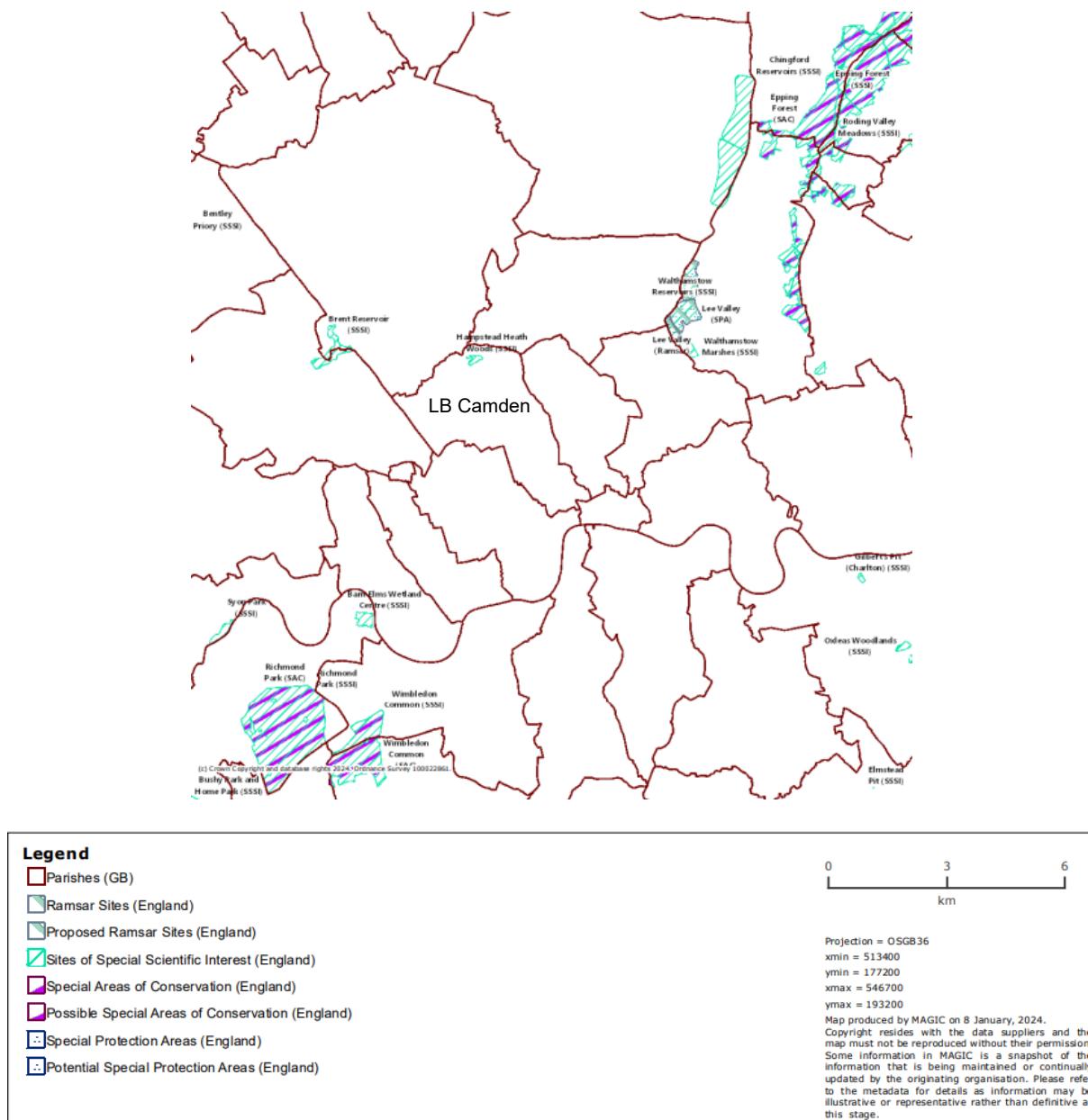
2.2 The first step for the competent authority is to decide whether the proposal is a project, a plan or neither. The EAP Update Proposed Submission Draft clearly falls within the definition the guidance gives for a plan: “*A plan sets out where future activities or developments should take place within a certain area. This can include any changes that are proposed to an existing plan*”. The EAP Update sets out the Council’s vision for future development at Euston until 2051 and includes planning policies and site allocations to help achieve this, updating the Plan that was adopted in 2015.

### **(2) “Check if a proposal might affect a European site”**

2.3 The HRA guidance suggests that location is the primary determinant of whether an effect is likely or not. It cautions that there may be effects on European sites “some distance away”, for example due to air, noise or water pollution.

2.4 For the purposes of this screening assessment, sites within approximately 10km radius of the borough are considered. This distance is considered to be the maximum over which measurable effects could occur. Natural England’s ‘Magic map’ shows the location of designated European sites (and potential sites). As can be seen in the extract from the ‘Magic map’ below, there are no European sites within the administrative boundary of the London Borough of Camden. The following sites are within 10km:

- Lee Valley SPA and Ramsar (approx. 3.7 miles, 5.95km);
- Wimbledon Common SAC (approx. 6.1 miles, 9.81km);
- Epping Forest SAC (approx. 6.2 miles, 9.97km); and
- Richmond Park SAC (approx. 6.7 miles, 10.78km).



### (3) Who to consult when carrying out an HRA

2.5 The HRA guidance states that the competent authority must consult with Natural England following the screening assessment and 'appropriate assessment' (see para 2.7) stage of the HRA process but can ask for advice at any stage in the process. This Screening Opinion will be shared with Natural England.

#### **(4) Following HRA principles**

2.6 The guidance states that where a plan *could affect* a European site, the competent authority needs to:

- Understand the conservation objectives for the sites;
- Consider existing threats and pressures (by reference to existing databases);
- Consider possible combined effects on the site with other plans;
- Give clear reasons and evidence for decisions; and
- Make sure the assessment is thorough and complete with clear and precise conclusions.

#### **(5) HRA Stages**

2.7 The HRA guidance sets out 3 main stages (not all will necessarily be required):

- (i) Screening – to check if the plan is likely to have a significant effect on the site(s) conservation objectives. If not, the following stages are not required.
- (ii) Appropriate assessment – assess likely significant effects of the plan in more detail and identify ways to avoid or minimise any effects
- (iii) Derogation – consider if proposals that would have an adverse effect on a European site qualify for an exemption.

### **3. Screening the EAP Update - Proposed Submission Draft**

3.1 This report is a ‘Screening Opinion’. The principle purpose of the screening exercise is to identify whether or not the plan “*risks having a significant effect on a European site on its own or in combination with other proposals*”.

3.2 As part of the screening exercise the competent authority must check if the plan is for the conservation management of the habitats/species of a European site. Given the EAP Update does not cover any area including a European site, the Council does not consider this to be the case.

3.3 The HRA guidance also advises that the competent authority must continue screening the plan if it contains: “non-conservation management activities, such as development, commercial operations or recreational events”. This involves checking the conservation objectives of sites likely to be affected. Following this evidence gathering, the ‘likely significant effect’ test is essentially a risk assessment to decide whether the subsequent stage of a HRA, i.e. an Appropriate Assessment, is required. An effect will be ‘significant’ if it could undermine the site’s conservation objectives. The ‘test of significance’ can generally be interpreted as any negative effects that are not negligible or inconsequential. Whether an effect is ‘likely’ is interpreted as a simple question of whether the plan or project concerned is capable of having an effect.

3.4 The Council has previously identified five European Sites that could be affected by non-conservation management activities. As part of the HRA of the EAP Update - Proposed Submission Draft officers have re-checked the Natural England mapping database (i.e. the Magic Map) to confirm that this list remains accurate and up-to-date. The relevant European sites are listed below.

<b>Site name</b>	<b>Designation and Code</b>
Epping Forest	Special Area of Conservation SAC (UK0012720)

	Essex, Outer London
Lee Valley	Special Protection Area SPA (UK9012111) Essex, Outer London, Hertfordshire
Lee Valley	Ramsar site UK11034 Essex, Outer London, Hertfordshire
Richmond Park	Special Area of Conservation SAC (UK0030246) Outer London
Wimbledon Common	Special Area of Conservation SAC (UK0030301) Outer London

3.5 A description of these five sites is set out in Table 1 below. The description of these sites and the rationale for their conservation at European level has been taken from the “Draft London Plan Habitats Regulations Assessment”, AECOM, November 2017, which also includes supplementary information to assess the vulnerability of the sites to potential adverse effects. The contents were compiled from the Natura 2000 forms, Natural England’s ‘conservation objectives’ for Sites of Special Scientific Importance (SSSIs) with European interest and the Joint Nature Conservation Committee and Natural England websites. The Council has checked whether more recent information is available and, where relevant, updated Table 1 accordingly.

3.6 The HRA guidance advises that when undertaking a screening assessment competent authorities should consider:

- the area over which the plan would take place;
- any overlaps or interaction with the protected features of a site in a direct or indirect way; and
- the effect of any essential parts of the plan, such as its location, timing or design.

3.7 Table 1 identifies the key reasons for the designation of each European site and also summarises the conclusions of the London Plan’s HRA in relation to the potential of significant effects on the sites from policies contained in the London Plan. It should be noted that any effects on European sites can also be minimised through the implementation of other pan-London strategies (such as the Mayor’s Transport Strategy – which is particularly relevant to reducing air pollution) and ‘management/ improvement plans’ for the individual sites which have been prepared collaboratively by stakeholders to manage/monitor potential environmental impacts, e.g. from additional visitor pressure and pollution.

#### **Check for combined effects**

3.8 The HRA guidance advises that a plan *alone* may have an effect that is not significant but when combined with other plans a likely significant effect could be identified. As part of this, competent authorities should check whether there are plans that have been drafted but not yet adopted.

- 3.9 The London Plan is the spatial development strategy for Greater London. It sets out a framework for how London will develop over the next 20-25 years and the Mayor's vision for good growth. The current London Plan was published in 2021. It is reviewed every five years. The Mayor is now starting to prepare the next London Plan.
- 3.10 The Council are preparing a new Local Plan for Camden. The new Camden Local Plan builds on the current Local Plan (2017) and sets out the Council's vision for future development over the Plan period to 2041 and includes the planning policies and site allocations to help achieve this.
- 3.11 It identifies how many new homes and jobs are needed to support Camden's population and where and how they should be provided. The Local Plan also has an important role in shaping how Camden's places look and feel, promoting inclusion, reducing inequality, enhancing the environment, tackling climate change and securing sustainable neighbourhoods. A

**Table 1. European site descriptions**

Site Name	Designation & Code	Qualifying Features		Current Condition and Threats	Condition	Key ecosystem factors
		Habitat	Species			
<b>Epping Forest</b>	SAC UK0012720	Northern Atlantic wet heaths with <i>Erica tetralix</i> ; European dry heaths; Atlantic acidophilous beech forests with <i>Ilex</i> .	Stag beetle <i>Lucanus cervus</i>	Air Pollution; Public disturbance; Inappropriate water levels; Water pollution  Natural England issued “Supplementary advice on conserving and restoring site features” in Epping Forest SAC in January 2019.  <a href="https://designatedsites.naturalengland.org.uk/SiteSACFeaturesMatrix.aspx?SiteCode=UK0012720&amp;SiteName=Epping%20Forest%20SAC">UK0012720 Epping Forest SAC Published 21 Sep 2021 (naturalengland.org.uk)</a>	The current condition of Epping Forest SAC is reported here: <a href="https://designatedsites.naturalengland.org.uk/SiteSACFeaturesMatrix.aspx?SiteCode=UK0012720&amp;SiteName=Epping%20Forest%20SAC">https://designatedsites.naturalengland.org.uk/SiteSACFeaturesMatrix.aspx?SiteCode=UK0012720&amp;SiteName=Epping%20Forest%20SAC</a>  The SAC is made up of multiple monitoring units. Monitoring units of wet heaths are “Unfavourable recovering”; units of dry heaths are “Unfavourable recovering” / “Unfavourable no change”; units with beech forest were predominantly “Unfavourable recovering” or “Not recorded while units with stag beetle populations were “Favourable”	Epping Forest straddles the Essex/East London boundary. It is predominantly made up of broad-leaved deciduous woodland with dry grassland and steppes and some inland water bodies.  <b>Recreational pressure:</b> The SAC receives a high number of visits (over 4 million a year) and there are long-standing concerns about increased recreational use resulting in damage to its interest features. Natural England advice to Epping Forest District Council in 2021 identified that the SAC features are vulnerable to the following impacts from recreational pressure: trampling, dog waste, vandalism, erosion and soil compaction, habitat disturbance, litter and pollution, fire and access by vehicle/on foot.  <b>Air quality:</b> The SAC is affected by relatively poor air quality alongside the roads that traverse the SAC, negatively affecting the epiphytic lichen communities of the Forest as well as other features. The nature of the road network around Epping Forest means that

Site Name	Designation & Code	Qualifying Features		Current Condition and Threats	Condition	Key ecosystem factors
		Habitat	Species			
						<p>journeys between a number of key settlements involves traversing the SAC. The Council has undertaken Air Quality related monitoring of the Epping Forest Special Area of Conservation (EFSAC) to understand what the current on-site conditions are. Natural England have confirmed 2024 that positive improvements to the background concentrations of air borne pollutants have been shown. Natural England has also indicated that, as it currently stands, ammonia levels are the focus of concern because of the effect the levels potentially have on lichens and bryophyte interest features. Ammonia arising from traffic comes from catalytic convertors but there are other sources that make a material contribution to ammonia levels that are not related to local plan development.</p> <p>Natural England has advised that within a 'core catchment'/'zone of influence' (ZOI) additional housing needs to be mitigated in some form to offset potential recreational harms. For Epping Forest, this ZOI is considered to be about 6.2km from the SAC boundary. This includes a number of London Boroughs including</p>

Site Name	Designation & Code	Qualifying Features		Current Condition and Threats	Condition	Key ecosystem factors
		Habitat	Species			
						<p>Haringey, Enfield and Hackney. Within the ZOI, developer contributions have begun to be secured that can be invested in strategic access and management measures, e.g. projects to relocate/redirect cars away from the most vulnerable and sensitive areas, improvement of paths to divert visitors away from the most intensively used areas etc.</p> <p>Source:  <a href="https://www.eppingforestdc.gov.uk/wp-content/uploads/2021/02/Interim-Mitigation-Strategy-for-Epping-Forest-Special-Area-of-Conservation.pdf">https://www.eppingforestdc.gov.uk/wp-content/uploads/2021/02/Interim-Mitigation-Strategy-for-Epping-Forest-Special-Area-of-Conservation.pdf</a></p> <p>Modelling for Epping Forest District Council's Local Plan to 2033 showed that growth internal to Epping District was likely to be the primary source of additional ammonia and NOx emissions and that other plans and projects were likely to have a negligible contribution to the 'in combination' effect: "This is thought to be because the average daily traffic flow on all modelled sections of road is dominated by people who either live or work in Epping district, particularly the settlements that surround Epping Forest SAC".</p>

Site Name	Designation & Code	Qualifying Features		Current Condition and Threats	Condition	Key ecosystem factors
		Habitat	Species			
						<p><a href="https://www.eppingforestdc.gov.uk/wp-content/uploads/2021/02/Interim-Epping-Forest-Air-Pollution-Mitigation-Strategy.pdf">https://www.eppingforestdc.gov.uk/wp-content/uploads/2021/02/Interim-Epping-Forest-Air-Pollution-Mitigation-Strategy.pdf</a></p> <p>Epping Forest District Council's 'Interim Air Pollution Mitigation Strategy' (2020) identifies a range of potential interventions to mitigate air quality impacts together with detail of how this would be delivered.</p>
<b>Lee Valley</b>	SPA UK9012111  RAMSAR UK 11034		<p>Birds (Wintering) Bittern <i>Botaurus stellaris</i></p> <p>(Migratory) Gadwall <i>Anas strepera</i> Shoveler <i>Anas clypeata</i></p> <p>It also qualifies as a Ramsar site under Criterion 2: nationally</p>	<p>Water pollution; Hydrological changes; Recreational disturbance including angling; Atmospheric pollution</p>	<p>The population of bird species and condition of the habitat is monitored by Natural England:  <a href="https://designatedsites.naturalengland.org.uk/SiteGeneralDetail.aspx?SiteCode=UK9012111&amp;SiteName=&amp;countyCode=21&amp;responsiblePerson=&amp;unitId=&amp;SeaArea=&amp;IFCArea=">https://designatedsites.naturalengland.org.uk/SiteGeneralDetail.aspx?SiteCode=UK9012111&amp;SiteName=&amp;countyCode=21&amp;responsiblePerson=&amp;unitId=&amp;SeaArea=&amp;IFCArea=</a></p>	<p>The Lee Valley is located to the north-east of London and comprises a series of embanked water supply reservoirs, sewage treatment lagoons and former gravel pits.</p> <p>The whole RAMSAR site is within the Lee Valley Regional Park, with a large area forming the River Lee Country Park. It supports high levels of visitor pressure, principally for angling, walking, cycling, birdwatching and boating.</p> <p><b>Recreational pressure:</b> Landowners/managers have undertaken initiatives both to facilitate and to promote greater public access for recreation.</p>

Site Name	Designation & Code	Qualifying Features		Current Condition and Threats	Condition	Key ecosystem factors
		Habitat	Species			
			<p>scarce plant species whorled water-milfoil <i>Myriophyllum verticillatum</i> and the rare/vulnerable invertebrate water-boatman <i>Micronecta minutissima</i></p> <p>Under Criterion 6: species/populations occurring at levels of international importance, i.e. Northern shoveler and Gadwall.</p>			<p>Two parts of the SPA/Ramsar site are within East Herts District: i.e. Amwell Quarry and Rye Meads. AECOM note that these areas are managed by Hertfordshire and Middlesex Wildlife Trust and RSPB. There are already visitor management measures in place, e.g. people are routed away from sensitive areas and no dogs are allowed. The vulnerability of this part of the designated site to potential adverse impacts is therefore considered to be low.</p> <p><b>Air quality:</b> Phosphate availability, rather than nitrogen deposition, was considered to be of more relevance in the draft London Plan HRA. It notes this is not something that planning policies can directly influence.</p> <p><b>Water resources:</b> Water levels for the reservoirs are controlled by Thames Water and have been largely responsible for creating the circumstances that led to the site being of international importance for species. There are no wastewater treatment works with catchments within the GLA boundary that discharge into the River Lee or its tributaries.</p>

Site Name	Designation & Code	Qualifying Features		Current Condition and Threats	Condition	Key ecosystem factors
		Habitat	Species			
						<p>AECOM note that in recent years the emphasis has generally been on increasing public access and recreation to the Lee Valley, including Walthamstow Reservoirs.</p> <p>They note that there are monitoring arrangements in place to check that the impact of increasing visitor numbers on the gadwell and shoveler remain sustainable and if adverse effects were identified, it is likely that access management measures could be tightened.</p> <p>Walthamstow Reservoirs continue to form an important element of London's water supply infrastructure. Co-ordination of visitor management is relatively straightforward due to Thames Water remaining the sole land manager.</p>
<b>Richmond Park</b>	SAC UK0030246		The population of stag beetle <i>Lucanus cervus</i>	Natural England issued "Supplementary advice on conserving and restoring site features" in Richmond Park SAC in February 2016.	The current condition of Richmond Park SAC is reported here: <a href="https://designatedsites.naturalengland.org.uk/SiteSACFeaturesMatrix.aspx?SiteCode=UK0030246&amp;SiteName=Richmond%20Park%20SAC">https://designatedsites.naturalengland.org.uk/SiteSACFeaturesMatrix.aspx?SiteCode=UK0030246&amp;SiteName=Richmond%20Park%20SAC</a>	<p>Richmond Park lies in SW London and has a large number of ancient trees with decaying timber, which support the diverse beetle fauna. The SAC is made up of broad-leaved deciduous woodland, improved and dry grassland, heath and scrub.</p> <p><b>Recreational pressure</b></p>

Site Name	Designation & Code	Qualifying Features		Current Condition and Threats	Condition	Key ecosystem factors
		Habitat	Species			
				<a href="https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0030246.pdf">https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0030246.pdf</a>	All units are 'Favourable'	<p>It is located in an urban setting and as such is potentially vulnerable to recreational pressure and urbanisation. The site is designated as an SAC only for its stag beetle population, which is dependent upon mature trees and deadwood. The continuing presence of the stag beetle is largely dependent on good habitat management.</p> <p><b>Air quality</b> While stag beetles themselves are not vulnerable to nitrogen deposition, this can negatively impact on woodland features such as ground flora diversity/structure.</p> <p>These impacts may be offset by planning policies to reduce traffic flows and wider improvements in vehicle technologies.</p> <p>AECOM assessment for London Plan: "The site is designated as a SAC only for its stag beetle population, which is dependent upon mature trees and deadwood during its life stages. The presence of mature trees and deadwood would be affected by habitat management but not by development identified in the London Plan."</p>

Site Name	Designation & Code	Qualifying Features		Current Condition and Threats	Condition	Key ecosystem factors
		Habitat	Species			
						<p>On air pollution specifically: “Stag beetles are not vulnerable to nitrogen deposition...Most of the effects of nitrogen deposition on woodlands are on features other than tree growth, such as ground flora diversity/structure, fungi and lichen population.”</p> <p>AECOM note that the interventions outlined in the London Environment Strategy and the Mayor’s Transport Strategy will reduce NOx by 65% by 2030 and that declines in NOx will consequently reduce oxidised nitrogen deposition on European sites, particularly close to roads.</p> <p>AECOM conclude that the London Plan does not “interact with the SAC in a manner that would prevent it achieving its conservation objectives for stag beetle”.</p>

Site Name	Designation & Code	Qualifying Features		Current Condition and Threats	Condition	Key ecosystem factors
		Habitat	Species			
Wimbledon Common	SAC UK0030301	Northern Atlantic wet heaths with <i>Erica tetralix</i>  European dry heaths	Stag beetle <i>Lucanus cervus</i>	Inappropriate behaviour by some visitors (e.g. collection and removal of dead wood);  Habitat fragmentation;  Invasive species (specifically the oak processionary moth);  Atmospheric pollution (nitrogen deposition)  Natural England issued “Supplementary advice on conserving and restoring site features” in Wimbledon Common SAC in February 2016.  <a href="https://designatedsites.naturalengland.org.uk/SiteGeneralDetail.aspx?SiteCode=UK0030301&amp;SiteName=wimbledon%20common&amp;countyCode=&amp;responsiblePerson=&amp;SeaArea=&amp;IFCAArea=">European Site Conservation Objectives for Wimbledon Common SAC - UK0030301 (naturalengland.org.uk)</a>	The current condition of Wimbledon Common SAC is reported here:  <a href="https://designatedsites.naturalengland.org.uk/SiteGeneralDetail.aspx?SiteCode=UK0030301&amp;SiteName=wimbledon%20common&amp;countyCode=&amp;responsiblePerson=&amp;SeaArea=&amp;IFCAArea=">https://designatedsites.naturalengland.org.uk/SiteGeneralDetail.aspx?SiteCode=UK0030301&amp;SiteName=wimbledon%20common&amp;countyCode=&amp;responsiblePerson=&amp;SeaArea=&amp;IFCAArea=</a>  The latest monitoring shows that the condition of Stag beetle habitat is “Favourable”; North Atlantic wet heath units are “Unfavourable recovering” and European dry heath units are “Unfavourable recovering” (x2) and “Unfavourable no change” (x1)	Wimbledon Common is also located in SW London and has a large number of old trees with fallen decaying timber. The SAC is made up primarily of a mix of dry grassland/steppes and broad-leaved deciduous woodland. The common is the most extensive area of open, wet heath on acidic soils in Greater London.  <b>Recreational pressure:</b> The site does not have a high level of accessibility and has an urban setting, and is therefore likely to have a more local core recreational catchment. It is unlikely this significantly extends beyond 5km, though it is known occasionally recreational events for Londoners are held on the Common (e.g. ‘Run through’).  The heathlands of the SAC are theoretically vulnerable to recreational pressure and Wimbledon Common generally (not just the SAC component) is a popular site for visitors.  Most of the heath fails to meet key targets for quality – although the actual extent of the heathland is increasing due to a programme of tree and scrub removal.

Site Name	Designation & Code	Qualifying Features		Current Condition and Threats	Condition	Key ecosystem factors
		Habitat	Species			
						<p><b>Air quality:</b>  An area of heathland within the SAC lies within 200m of the A3 and A219 roads. Average background nitrogen deposition rates within the SAC exceed the minimum part of the critical load range for heathland.</p> <p>AECOM find that while the SAC does not yet meet its conservation targets, “this does not appear to be attributable to recreational trampling and is more to do with a historic lack of traditional management”. They also note that the main hotspots of recreational usage are not in fact the heathland areas of the common but grassland, which do not contain SAC features.</p> <p>They also found that the historic extent of scrub encroachment on the heath suggests that in general a lack of physical disturbance and trampling is a greater concern for the heathland areas than excessive footfall.</p> <p>AECOM find that the local road network is linked to issues of nitrogen deposition but that the London Plan’s policies should overall have an ameliorative effect. These policies</p>

Site Name	Designation & Code	Qualifying Features		Current Condition and Threats	Condition	Key ecosystem factors
		Habitat	Species			
						together with the London Environment Strategy and the Mayor's Transport Strategy "will improve air quality considerably over the plan period and beyond even allowing for growth in population and jobs".
<p>Sources:          "Greater London Authority Plan Habitats Regulations Assessment, Modifications Update December 2019" AECOM/GLA</p> <p>Definitions note:  <b>Current Condition and Threats</b> - provides information concerning the current status of sites, recognised trends, and potential threats</p> <p><i>Favourable condition</i> The SSSI is being adequately conserved and is meeting its 'conservation objectives', however, there is scope for enhancement</p> <p><i>Unfavourable recovering</i> - Often known as 'recovering'. SSSIs are not yet fully conserved but all the necessary management measures are in place. Provided that the recovery work is sustained, the SSSI will reach favourable condition in time. In many cases, restoration takes time.</p> <p><i>Unfavourable no change</i> - The special interest of the SSSI is not being conserved and will not reach favourable condition unless there are changes to site management or external pressures. The longer the SSSI unit remains in this poor condition, the more difficult it will be, in general, to achieve recovery.</p> <p><i>Unfavourable declining</i> - The special interest of the SSSI is not being conserved and will not reach favourable condition unless there are changes to site management or external pressures. The site condition is becoming progressively worse.</p>						

## **Screening assessment of the Euston Area Plan Proposed Submission Draft**

- 3.11 This section sets out the screening assessment of the EAP Update - Proposed Submission Draft. As part of the screening assessment possible pathways of impact leading to likely significant effects from the EAP on the above European sites have been considered. An assessment has been undertaken of the whole EAP Update and the policies contained within it.
- 3.12 Impacts on European sites are mainly likely to be due to increased levels of development, and in particular housing development, which result in increased visitor pressure, increased air pollution and impacts on water resources (discussed below). The need to deliver further housing in Camden, is informed by national policy and the London Plan, and is influenced and supported by policies in the Camden Local Plan. Other policies in the Plan, including those which seek to mitigate the impacts of growth, have also been considered as part of the assessment below. The EAP Update seeks to deliver the housing targets which are set out in the Camden Local Plan and provides specific policies for the Euston area. Where appropriate, reference is also made to policies in the Local Plan which will also apply to the Euston area and will help to mitigate the impacts.

### ***Impacts of linkages between the sites by water, including water quality issues***

- 3.13 Camden is classified by the Environment Agency as being in Flood Zone 1, as there are no main rivers within the borough. All main rivers historically located within Camden are now incorporated into the Thames Water sewer network. These are referred to as 'lost' rivers and include the River Fleet, River Westbourne and River Tyburn, and therefore would not impact on the above European sites. The Regent's Canal joins the River Lee just before it flows into the Thames; however, this is some way downstream of the Lee Valley Ramsar/SPA sites and thus is not likely to have an impact on them. Furthermore, impacts from development on groundwater in Camden itself are likely to be minimal and thus would also be unlikely to have any effect on the European sites, in particular on important species and habitats within them.

### ***Increased visitor access***

- 3.14 The EAP Update - Proposed Submission Draft is likely to lead to an increase in population in Euston, due to the development of additional homes. This may lead to increased visitor numbers at the European sites, which would put additional pressure on them and may affect the range of important species and habitats at the sites. Natural England has advised that within a 'core catchment'/'zone of influence' (ZOI) additional housing needs to be mitigated in some form to offset potential recreational harms. For Epping Forest, this ZOI is considered to be about 6.2km from the SAC boundary, meaning that the London Borough of Camden does not fall within this. Impacts associated with visitor access to sites can also be controlled, or mitigated against, to some extent by management practices at the sites. Given this, it is considered that any increase in visitor numbers arising from new development in Camden is likely to be limited given the distance of the sites from the borough and is therefore not judged to be significant.

### ***Light or air pollution***

- 3.15 Light pollution is likely to increase as a result of increased development in Euston, however this would be unlikely to have an impact on the European sites, particularly given the high levels of light pollution which exist across London currently and the distance of the sites from the borough. Furthermore the Camden Local Plan

Proposed Submission Draft seeks to ensure that the direct and indirect impacts of light pollution on habitats and species are addressed and any negative impacts are mitigated.

- 3.16 With regards to air pollution, there may be possible impacts on the European sites due to poor air quality in Euston as a result of traffic, particularly as air quality is an issue affecting Epping Forest SAC. However, as described below (in paragraph 3.19), policies within the EAP Update - Proposed Submission Draft support an increase in the use of more sustainable transport modes and all development is expected to be car free, which should help to limit any further increase in traffic. Euston as an area is extremely well connected by public transport. Given this, it is unlikely the protected habitats and species at the sites would be impacted by the Local Plan.
- 3.17 Furthermore, it is also important to note that the London Plan 2021 provides additional policy to help address air pollution. This includes the requirement for new development to be at least air quality neutral (Policy SI 1) and for development to be net zero-carbon (Policy SI 2).

#### ***Spread of pest species***

- 3.18 Policies within the Local Plan Proposed Submission Draft would be unlikely to have any impact on the spread of pest species.

#### ***Increased traffic***

- 3.19 The European sites may be impacted as a result of poorer air quality in the borough as a result of traffic. However, the EAP Update - Proposed Submission Draft supports an increase in use of more sustainable transport modes and, under the Local Plan, all development should be 'car free' (no parking provided) to limit vehicle trips. There would, however, still be increases in traffic associated with development (deliveries, servicing and disabled parking) and construction, however it is unlikely that this would be significant enough to impact on the European sites, and, in particular, on the important species or habitats at these sites.

#### ***Flooding***

- 3.20 It is unlikely that any flooding incident in the borough would impact on any of the protected habitats and species at the European sites given their distance from Camden. The policies in the Local Plan Proposed Submission Draft seek to ensure that development in Camden does not increase the risk of flooding both now and in the future, and reduces flood risk where possible. The impact is therefore unlikely to be significant, and new development should reduce overall rates of surface water runoff and meet greenfield runoff rates following the drainage hierarchy and utilisation of sustainable drainage, as required by Local Plan policy.

#### ***Increased water use from new development (contributing to water stress within the region which may have a negative impact on water availability within the sites, for example water levels of the River Lee)***

- 3.21 The combination of climate change and increased new development is likely to increase water stress in London. However, the impact of new homes in the borough is likely to be minimal, particularly given water efficiency policies within the Local Plan which will require all new homes and other development to be water efficient. Here, the Local Plan seeks to ensure that developments likely to have high water use include a grey water system. New development will also be required to meet the higher Building Regulation standard for water use, and other developments are

strongly encouraged to install water efficient fixtures and fittings. Furthermore, the Local Plan seeks to ensure adequate water supply, surface water, foul drainage and sewerage treatment capacity exists to serve all new developments. Thames Water has been engaged as part of the Local Plan process.

***Increased CO2 emissions from new development may contribute to climate change which may have a negative impact on the sites***

3.22 Total carbon emissions have reduced significantly in Camden in recent years. It is likely that, in general, climate change will have a negative impact on the European sites; however, the impact of CO2 emissions from Euston as a result of EAP Update - Proposed Submission Draft is likely to be minimal. Furthermore, the Local Plan policies provide a strong basis to limit impacts on climate change where development comes forward.

***Improvement of quantity and quality of accessible open space in the borough***

3.23 It is possible that policies within the EAP Update - Proposed Submission Draft which promote improvement to the quantity and quality of accessible open space in the borough may alleviate visitor pressure on the European sites by providing new or improving existing local open space.

**Coding the potential impacts**

3.24 Table 2 below provides a version of the coding criteria produced by Tyldesley and Associates guidance on Appropriate Assessments (Habitat Regulations Assessment Handbook). These criteria have been used to assess whether the EAP Update Proposed Submission Draft is likely to impact on the European sites identified above.

**Table 2. Coding used for recording effects/impacts on European Sites**

<b>Reason why policy will have no effect on a European Site</b>	
<b>1</b>	The policy will not itself lead to development (e.g. it relates to design or other qualitative criteria for development, or it is not a land use planning policy)
<b>2</b>	The policy makes provision for a quantum / type of development (and may or may not indicate one or more broad locations)
<b>3</b>	No development could occur through this policy alone, because it is implemented through other DPD policies that are more strategic or more detailed and therefore more appropriate to assess for their effects on a European Site and associated sensitive areas.
<b>4</b>	Concentration of development in urban areas will not affect European Site and will help to steer development and land use change away from a European Site and associated sensitive areas.
<b>5</b>	The policy will help to steer development away from a European Site and associated sensitive areas, e.g. not developing in areas of flood risk or areas otherwise likely to be affected by climate change.
<b>6</b>	The policy is intended to protect the natural environment, including biodiversity.
<b>7</b>	The policy is intended to conserve or enhance the natural, built or historic environment, and enhancement measures will not be likely to have any effect on a European Site.
<b>Reason why policy could have a potential effect</b>	
<b>8</b>	The policy steers a quantum or type of development towards, or encourages development in, an area that includes a European Site or an area where development may indirectly affect a European Site.
<b>Reason why policy would be likely to have a significant effect</b>	

<b>9</b>	The policy makes provision for a quantum, or kind of development that in the location(s) proposed would be likely to have a significant effect on a European Site. The proposal must be subject to appropriate assessment to establish, in light of the site's conservation objectives, whether it can be ascertained that the proposal would not adversely affect the integrity of the site.
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Source: *Screening report: 'Draft Further Alterations to the London Plan'* (Forum for the Future, September 2006)

## Policy Analysis

3.25 As part of the HRA Screening Assessment, every policy and site allocation policy in the Camden Local Plan Proposed Submission Draft has been assessed using the coding above (in Table 2), taking a precautionary approach.

**Table 3. Assessment of Policies and Site Allocations in the Camden Local Plan Proposed Submission Draft**

Policy	Why policy will have no impact on sites	Why the policy is likely to have an impact on sites	Essential recommendations to avoid potential effects on European Sites
Strategic Principle EAP1: Land use strategy A: Overall Mix: B: Homes: C: Economy and employment: D: Retail, leisure and Culture E: Social infrastructure F: Meanwhile uses G: Health and Well-being H: Safety and Security I: Inclusive Growth & delivering Social Value	2, 4, 7	n/a	n/a
Strategic Principle EAP2: Urban design strategy	1	n/a	n/a
Strategic Principle EAP3: Transport strategy	2, 4	n/a	n/a
Strategic Principle EAP 4: Environment	2, 4	n/a	n/a
Strategic Principle EAP 5: Open Space	2, 4, 6	n/a	n/a
Development Principle EAP 1: Euston station and tracks	2, 4, 6	n/a	n/a
Site allocation EA1: Euston Station	2, 4, 6		
EA2: Royal Mail	2, 4		
Development Principle EAP 2: Euston Road	2, 4, 6	n/a	n/a

<b>Policy</b>	<b>Why policy will have no impact on sites</b>	<b>Why the policy is likely to have an impact on sites</b>	<b>Essential recommendations to avoid potential effects on European Sites</b>
Site allocation EA3: The Place and Premier Inn	2, 4		
Site allocation EA4: 250 Euston Road	2, 4		
Site allocation EA5: Euston Square Hotel	2, 4		
Development Principle EAP3: Camden Cutting	2, 4	n/a	n/a
Site allocation EA6: Cutting at Park Village East	2, 4, 6		
Site allocation EA7: Granby Terrace Bridge/Hampstead Road	2, 4		
Site allocation EA8: Cutting at Mornington Terrace	2, 4		
Development Principle EAP 4: Drummond Street and Hampstead Road	2, 4, 6, 7	n/a	n/a
Site allocation EA9: Former Maria Fidelis School	2, 4, 6, 7		
Development Principle EAP 5: Regents Park Estate	2, 4, 7	n/a	n/a
Site allocation EA10: Regents Park Estate North	2, 4		
Development Principle EAP 6: Ampthill & Mornington Crescent Station	2, 4, 6, 7	n/a	n/a
Site allocation EA13: Ampthill Estate Railway Edge	2, 4		
Development Principle EAP 7: West Somers Town	2, 4	n/a	n/a
Delivery, planning benefits and monitoring - proposed updates include: Delivery and viability	1	n/a	n/a

## **4. Conclusion**

- 4.1 The policies in the EAP Proposed Submission Draft, in combination with other plans and projects, are not considered likely to have significant effects on the sites of European importance for habitats or species, or an adverse impact on the integrity of the sites. This Screening assessment has considered the scope of the EAP Update and its relationship with other plans, in particular the adopted London Plan and the draft Camden Local Plan. Therefore, it is not considered necessary to carry out Task 2 (Appropriate Assessment) and Task 3 (mitigation and alternative solutions) of the Habitats Regulations Appropriate Assessment.
- 4.2 Table 3 demonstrates that the policies in the EAP Proposed Submission Draft would not have any adverse impacts on any of the five identified European sites, based on the coding criteria set out in Table 2.
- 4.3 This Screening Assessment will be published for comment alongside the EAP Proposed Submission Draft.

## References

Camden Local Plan (2017) - <https://www.camden.gov.uk/camden-local-plan1> and [HRA Screening Assessment \(2015\)](#)

[Habitats Regulation Assessment Camden Local Plan: Proposed Submission Draft April 2025](#)

<https://www.eustonareaplan.info/wp-content/uploads/2014/04/EAP3-Sustainability-Appraisal-Report.pdf> (appendix E)

[Habitats Regulations Assessment of the North London Waste Plan; Proposed Submission Plan January 2019](#)

[Habitat Regulations Assessment London Plan: Changes in Response to Secretary of State Modifications Greater London Authority December 2020](#)

Intend to Publish London Plan 2019, including IIA Addendum Report Dec 2019 and HRA Report 2019

<https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/intend-publish-london-plan-2019>

Draft London Plan Habitats Regulations Assessment, AECOM (November 2017)

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