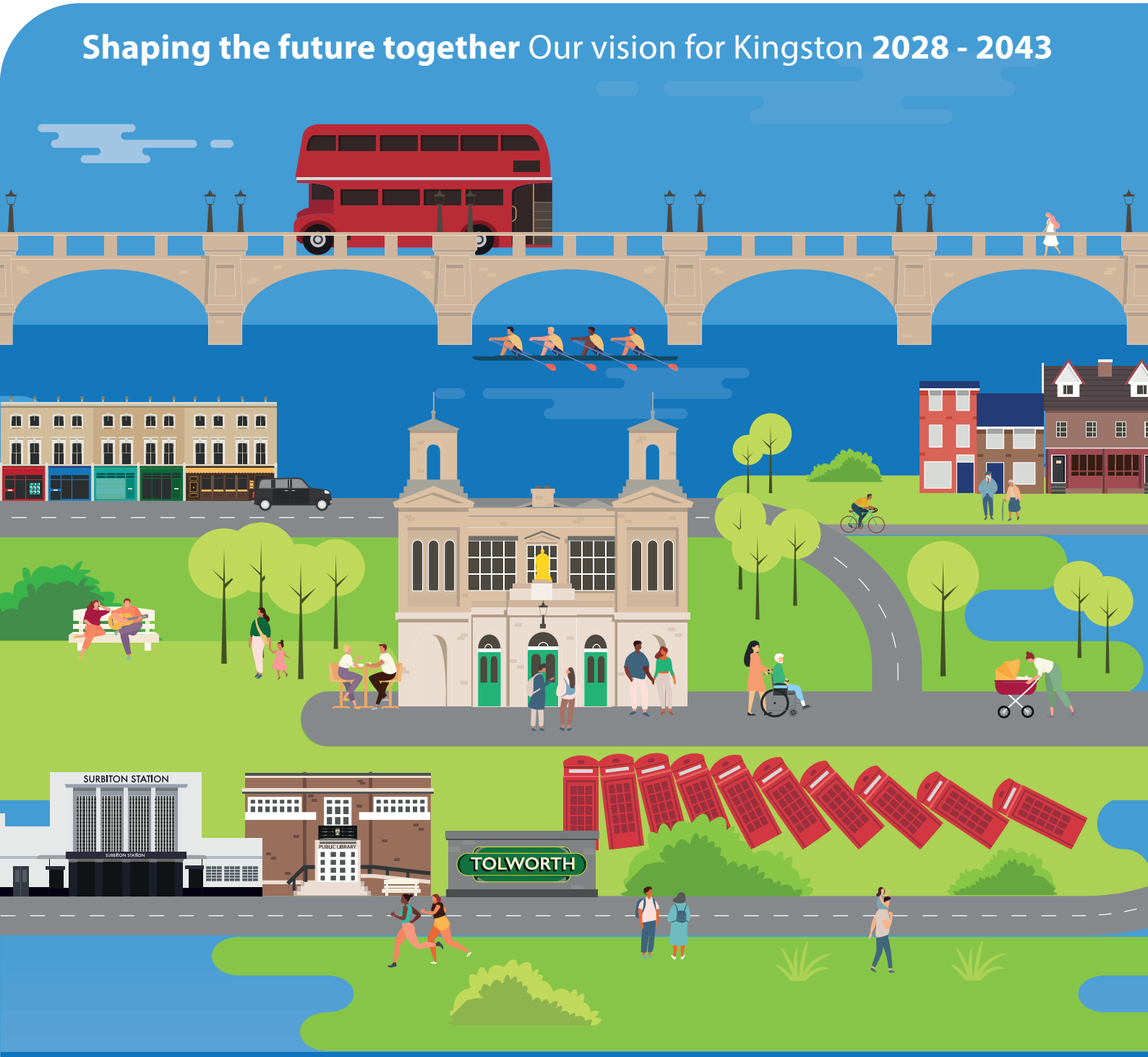
Habitats Regulations Assessment

Kingston's Local Plan

Shaping the future together Our vision for Kingston **2028 - 2043**



Regulation 19 consultation

28 September - 9 November

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THE ROYAL BOROUGH OF
KINGSTON
UPON THAMES

The Royal Borough of Kingston Upon Thames

New Local Plan (Regulation 19)

Habitats Regulations Assessment

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September 2026

Public

The Royal Borough of Kingston Upon Thames

New Local Plan (Regulation 19)

Habitats Regulations Assessment

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1 Introduction

1.1.1 The Royal Borough of Kingston upon Thames (hereafter referred to as RBKT) is in the process of preparing a New Local Plan for the Borough. The New Local Plan will set out how development will be planned and managed across the Borough through to 2043.

1.1.2 The Local Plan is a statutory document[1] that forms part of the Council's strategy to deliver sustainable development, tackle climate change and deliver new homes, jobs and infrastructure for current and future RBKT residents. Local Plans must be positively prepared, justified, effective and consistent with national policy, in accordance with Section 20 of the Planning and Compulsory Purchase Act 2004 (as amended) and the National Planning Policy Framework (NPPF)[2,3].

1.1.3 The Local Plan sits within a wider framework of planning documents, including national guidance set out by the government in the NPPF (as referenced above), regional and city planning policies and guidance, strategic plans, supporting strategies and background studies. The Local Plan will form the basis on which planning applications will be determined within RBKT's administrative area.

1.1.4 WSP UK Limited (WSP) has been appointed by RBKT to undertake the Habitats Regulations Assessment (HRA) for the Local Plan. The focus of the HRA process is on identifying the potential for adverse effects as a result of the Local Plan policies on the integrity of European nature conservation sites (hereafter referred to as "Habitats sites").

1.1.5 Under The Conservation of Habitats and Species Regulations 2017[4] (as amended) (the 'Habitats Regulations') 'Competent Authorities' must assess plans and projects for their potential to cause Likely Significant Effects (LSE) on Habitats sites. Where the plan or

[1] Section 19 of the Planning and Compulsory Purchase Act 2004 sets out specific matters to which the local planning authority must have regard when preparing a local plan. Regulations 8 and 9 of the Town and Country Planning (Local Planning) (England) Regulations 2012 prescribe the general form and content of local plans and adopted policies maps, while regulation 10 states what additional matters local planning authorities must have regard to when drafting their local plans.
[2] The National Planning Policy Framework 2024. Available online: [ARCHIVED CONTENT] National Planning Policy Framework - GOV.UK. Accessed [17/09/2026]
[3] As a legacy plan, RBKT Local Plan is being assessed under the 2024 NPPF not the latest version which was published on 17 August 2026.
[4] The Conservation of Habitats and Species Regulations 2017. Available at: The Conservation of Habitats and Species Regulations 2017 (legislation.gov.uk) Accessed [26/06/2026]

project may lead to LSE it must be subject to an Appropriate Assessment to determine whether there will be adverse effects to any Habitats sites.

1.1.6 Stage 1 (Screening), as presented within this report, represents the first step in the HRA process and comprises a desk-based review of relevant information, including biodiversity information and relevant HRA reporting (relating to other relevant plans and projects).

1.1.7 This exercise identifies all relevant Habitats sites where LSE could occur and the information captured here will form the evidence base for this Stage 1 HRA (Screening). Further consideration of LSE is then provided within the Stage 2 Appropriate Assessment (see Methodology Section 3).

1.1.8 A HRA was previously undertaken for the Kingston Local Plan in 2022 (Regulation 18), with an addendum produced in 2025 to include additional sites (WSP, 2022b; 2025). This report comprises the HRA of the Regulation 19 Local Plan.

1.2 Report Framework

1.2.1 This HRA screening report has been produced as a part of the Integrated Impact Assessment (IIA) that incorporates the requirement of a Strategic Environmental Assessment (SEA) for the Local Plan and associated plans.

1.2.2 At a screening level, this report will ensure that all HRA-related considerations are fully integrated into the Local Plan documents as they develop.

1.2.3 This report details:

- the HRA process and methodology for assessment;
- the relevant Habitats sites within the Zone of Influence (ZOI) for the Local Plan policies;
- the challenges of the Local Plan policies and how these may impact upon relevant Habitats sites;
- the screening of LSE (Stage 1) of the Local Plan policies. (including reference to the supporting report *Air Quality Information Report to Support Habitats Regulations Assessment*) and;
- the consideration of potential adverse effects on site integrity within a Stage 2 Appropriate Assessment (including reference to Air Quality information).

1.2.4 It should be noted that this HRA has been based solely upon the RBKT Local Plan and does not include a detailed analysis of any projects that may be brought forwards subsequent to the New Local Plan where additional LSE may arise.

1.3 The RBKT Local Plan

1.3.1 The New Local Plan will set out a vision for the future of the Borough. It will cover a range of areas, from specifying the locations for new homes and businesses, to planning policies which address local issues to ensure development is achieved in a sustainable manner, supporting the protection and enhancement of the environment, green spaces and cultural and historic assets.

1.3.2 Once adopted, alongside the London Plan and neighbourhood plans (made by qualifying bodies), the Local Plan will form part of the Borough's Development Plan and be the basis for determining planning applications; shaping how the Borough will develop over the next 17 years. Further details relating to the Local Plan, including the Local Plan vision and objectives are set out within the IIA Report[5] (WSP, 2026).

1.3.3 The Local Plan policies which are the focus of this screening exercise are listed in Table 1-1, but for more detail refer to the primary source document (RBKT, 2022). A brief summary of each policy is also given in the screening Table 7-3 Section 7.

Table 1-1 – RBKT Local Plan policies screened in the HRA

Policy number	Title
Sustainable Development	
K1	Achieving Sustainable Development
K2	Locations for Sustainable Development
K3	Key Areas of Change
Climate Change and Environmental Sustainability	
KC1	Climate Change and Environmental Sustainability *Strategic Policy*
KC2	Air Quality
KC3	Flood Risk
KC4	Sustainable Drainage
KC5	Wastewater management

[5] WSP (2026) The Royal Borough of Kingston Upon Thames. New Local Plan: Integrated Impact Assessment Report. Regulation 19 (pre-submission) Stage.

Policy number	Title
KC6	Managing Heat Risk
KC7	Minimising Greenhouse Emissions
KC8	Energy Infrastructure
KC9	Ground Contamination and Hazardous Substances
KC10	Sustainable Construction and Supporting the Circular Economy
KC11	Waste and Recycling Management
Design and Heritage	
KD1	A Place-Led Approach to Design
KD2	Local Context and Character
KD3	Public Realm, Landscape and Amenity
KD4	Housing Quality and Amenity Space Standards
KD5	Inclusive and Safe Environment
KD6	Circular Economy and Adaptable Design
KD7	Residential Alterations, Extensions and Basements
KD8	Site Smalls Development (Infill, Backland and Garden Land)
KD9	Tall and Taller Buildings
KD10	Commercial Frontages, Advertisements and Digital Infrastructure
KD11	Historic Environment
KD12	Heritage Assets
KD13	Archaeology
KD14	Local Views
Housing Delivery	
KH1	Housing Requirement
KH2	Affordable Housing

Policy number	Title
KH3	Housing Size Mix
KH4	Specialist and Supported Housing
KH5	Purpose-Built Student Accommodation
KH6	Houses in Multiple Occupations
KH7	Other Housing Models
KH8	Gypsies and Travellers
Economy and Town Centres	
KE1	Supporting the borough's economy and town centres *Strategic Policy*
KE2	Protecting employment Uses
KE3	Affordable workspace
KE4	Securing employment and training opportunities
KE5	Development in industrial locations
KE6	Locally Significant Industrial Sites
KE7	Development in town centres
KE8	Visitor Accommodation
KE9	Hot Food Takeaways
KE10	Betting Offices
Social Infrastructure	
KS1	Social Infrastructure *Strategic Policy*
KS2	Health and social care facilities
KS3	School, College and University Facilities
KS4	Community Facilities
KS5	Arts and Cultural Facilities

Policy number	Title
KS6	Sports and recreational facilities
KS7	Play and Informal Recreation
KS8	Public Houses
Natural Environment	
KN1	Green Infrastructure
KN2	Open Spaces
KN3	Biodiversity
KN4	Urban Greening and Trees
KN5	Food Growing
KN6	Green Belt and Metropolitan Open Land
KN7	Rivers and River Corridors
KN8	Moorings and Floating Structures
Transport	
KT1	Strategic Approach to Transport *Strategic Policy*
KT2	Sustainable Travel and Healthy Streets
KT3	Car Parking and Car Free Development
KT4	Sustainable Servicing
KT5	River Transport
Implementation and Monitoring	
KI1	Infrastructure and Developer Contributions
KI2	Monitoring

2 Relevant policy, legislation, case law and guidance

2.1 Legislative Background

2.1.1 Under the Habitats Regulations 'Competent Authorities' must assess plans and projects for their potential to cause LSE on Habitats sites. Where the plan or project may lead to LSE, it must be subject to an Appropriate Assessment to determine whether there will be adverse effects on any Habitats sites. Any plan or project that would lead to adverse effects on the integrity of Habitats site(s) cannot be permitted without meeting strict additional tests.

2.1.2 Defra guidance[6] states that Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) in the UK no longer form part of the EU's Natura 2000 ecological network. The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 have created a National Site Network (NSN) on land and at sea, including both the inshore and offshore marine areas in the UK. The national site network includes:

- existing SACs and SPAs; and
- new SACs and SPAs designated under these Regulations.

2.1.3 Any references to Natura 2000 in the 2017 Regulations and in guidance now refers to the new NSN.

2.1.4 It is a matter of Government policy (NPPF paragraph 194) that sites designated under the 1971 Ramsar Convention for their internationally important wetlands (commonly known as Ramsar sites), candidate SACs or SPA's, proposed Ramsar sites and compensatory habitats which relate to these sites[7] are also considered in the same way as Habitats sites. Together with SACs and SPAs, these sites are referred to as 'Habitats sites' in the NPPF and in this report.

2.1.5 Other site designations of national or local importance are not assessed by the HRA process, but with respect to Sites of Special Scientific Interest (SSSI), these designations largely overlap with European or Ramsar sites.

2.1.6 Maintaining a coherent network of protected sites with overarching conservation objectives is still required in order to:

- fulfil the commitment made by government to maintain environmental protections; and

[6] Defra Policy Paper Changes to the Habitats Regulations 2017 **(**Published 1 January 2021). Available online: https://www.gov.uk/government/publications/changes-to-the-habitats-regulations-2017/changes-to-the-habitats-regulations-2017 Accessed August 2026

[7] Potential Special Protection Areas, possible Special Areas of Conservation and proposed Ramsar sites are sites on which the Government has initiated public consultation on the scientific case for designation as a Special Protection Area, candidate Special Area of Conservation or Ramsar Site.

- continue to meet our international legal obligations, such as the Bern Convention, the Oslo and Paris Conventions (OSPAR), Bonn and Ramsar Conventions.

2.1.7 This report presents information to enable the screening assessment required as part of Stage 1 of the HRA process, to establish whether or not the RBKT Local Plan will have a LSE upon the NSN and Habitats sites.

2.1.8 The principle of Favourable Conservation Status (FCS) of features within Habitats sites as set out in the original Habitats Directive[8] is central to this assessment. The use of the term FCS is not amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 and the term still has the meaning given by Article 1 of the Habitats Directive. Defra guidance[9] does however note that:

"an appropriate authority is only responsible for managing and adapting the national site network to secure FCS of a feature proportionately to the importance of the UK within the feature's natural range".

2.1.9 The Habitats Directive provides further interpretation of the meaning of 'favourable conservation status' within Article 1 parts a, e and i as below:

'(a) conservation means a series of measures required to maintain or restore the natural habitats and the populations of species of wild fauna and flora at a favourable status as defined in (e) and (i);…..

(e) conservation status of a natural habitat means the sum of the influences acting on a natural habitat and its typical species that may affect its long-term natural distribution, structure and functions as well as the long-term survival of its typical species within the territory referred to in Article 2. The conservative status of a natural habitat will be taken as "favourable" when:

- *its natural range and areas it covers within that range are stable or increasing, and*
- *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*
- *the conservation status of its typical species is favourable as defined in (i);*

(i) conservation status of a species means the sum of the influences acting on the species concerned that may affect the long-term distribution and abundance of its populations within

[8] The Habitats Directive, European Commission. Available online: https://ec.europa.eu/environment/nature/legislation/habitatsdirective/index_en.htm Accessed [August 2026]
[9] Defra Policy Paper Changes to the Habitats Regulations 2017 **(**Published 1 January 2021). Available online: https://www.gov.uk/government/publications/changes-to-the-habitats-regulations-2017/changes-to-the-habitats-regulations-2017 Accessed [06/07/22]

the territory referred to in Article 2; The conservation status 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, and*
- *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'.*

2.2 Stages of Habitats Regulations Assessment

2.2.1 The UK government has set out the step-wise approach which should be followed to enable Competent Authorities to discharge their duties under The Habitats Regulations[10] and provides further clarity on the interpretation of Articles 6 (3) and 6 (4), and the actions required under Regulation 63 (1) of The Habitats Regulations. The process used is usually summarised in three distinct stages of assessment:

- **Stage 1: Screening**: the process which identifies whether effects upon the Habitats Sites by a plan or project are possible, either alone or in-combination with other plans or projects. The screening assessment then considers whether these effects are likely to be significant. A plan or project should be considered 'likely' to have an effect if the competent authority is unable (on the basis of objective information) to exclude the possibility that the plan or project could have significant effects on any Habitats site, either alone or in-combination with other plans or projects. An effect will be 'significant' simply if it could undermine the site's conservation objectives. The 'screening' test or 'test of significance' is a low bar, intended as a trigger rather than a threshold test.

- **Stage 2: Appropriate Assessment**: the detailed consideration (if required) of the effect on the integrity of the Habitats sites by the plan or project, either alone or in-combination with other plans or projects, with respect to the Habitats site's conservation objectives and their structure and function. The 'integrity' of a site is defined as "*the coherence of its ecological structure and function, across its whole area, that enables it to sustain the habitat, complex of habitats and/or the levels of populations of the species for which it was designated*[11]". The scope of any appropriate assessment stage is not set, and the assessments will not be extremely

[10] Department of Environment, Food and Rural Affairs. (2023). Guidance - Habitats regulations assessments: protecting a Habitats site. Available at: https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site [Accessed August 2026].

[11] Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC (EC 2002).

detailed in every case (particularly if mitigation is clearly available, achievable, and likely to be effective). The assessments must be 'appropriate' to the effects and proposal being considered, and sufficient to ensure that there is no reasonable doubt that adverse effects on site integrity will not occur (or sufficient for those effects to be appropriately quantified should Stage 3 be required).

- **Stage 3: Derogations**: the process under which a plan or project may still go ahead if it fails the integrity test at Stage 2. To qualify for a derogation, the plan or project must pass three legal tests:
  - There are no feasible alternative solutions that would be less damaging or avoid damage to the site;
  - The plan or project needs to be carried out for imperative reasons of overriding public interest (IROPI); and
  - Necessary compensatory measures to maintain the overall coherence of the National Site Network can be secured

2.2.2 This report details Stage 1 screening, and Stage 2 Appropriate Assessment.

2.3 Relevant Case Law

2.3.1 There are a number of Court of Justice of the European Union (CJEU) rulings which are relevant to this assessment and have been considered throughout the HRA. These are given for information in Appendix A.

2.3.2 As the general provisions for the protection of Habitats sites and the procedural requirements to undertake HRA to assess the implications of Plans or Projects for Habitats sites remain, this previous case law established prior to the UK's exit from the EU is considered to apply unless superseded by the judgement of an appropriate UK court.

2.4 National Planning Policy

2.4.1 NATIONAL PLANNING POLICY FRAMEWORK (2024) [12]

2.4.2 In relation to biodiversity and the RBKT Local Plan, the following paragraphs in the document are relevant:

- Paragraph 187, which states '*Planning policies and decisions should contribute to and enhance the natural and local environment by*:

[12] The National Planning Policy Framework 2024. Available online: [ARCHIVED CONTENT] National Planning Policy Framework - GOV.UK. Accessed [17/09/2026]

a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services- including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs;

e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and

f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.'

- Paragraph 188 which states:

  'Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries..'

- Paragraph 192 which states:

To protect and enhance biodiversity and geodiversity, plans should:

a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and
b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

- Paragraph 193 which states:

  When determining planning applications, local planning authorities should apply the following principles:

  a) *if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;*
  b) *development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;*
  c) *development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and*
  d) *development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.*

- Paragraph 194 which states:

The following should be given the same protection as habitats sites:

  a) *potential Special Protection Areas and possible Special Areas of Conservation;*
  b) *listed or proposed Ramsar sites; and*
  c) *sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.*

- Paragraph 195 which states:

  The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.

2.5 Relevant Guidance

NATURAL ENGLAND STANDARD ADVICE FOR AIR QUALITY IMPACTS FOR LOCAL PLANS

2.5.1 Natural England's guidance requires Local Plans to assess potential air quality impacts on Habitats Sites and SSSIs arising from increased traffic and associated emissions. Particular consideration should be given to designated sites containing sensitive habitats within 200m of affected roads.

2.5.2 A staged assessment approach is recommended, comprising screening, detailed air quality modelling, in-combination assessment, ecological evaluation and, where necessary, Appropriate Assessment. A screening threshold of 1% of the relevant critical level or critical load should be applied for both alone and in-combination effects. Where this threshold is exceeded, further assessment is required.

2.5.3 The assessment should consider ammonia (NH_3), nitrogen oxides (NOx), nitrogen deposition and acid deposition, and should not rely solely on numerical exceedances. The significance of effects should be determined in the context of site-specific conservation objectives, habitat sensitivity, the extent of affected habitats, existing environmental condition and the potential for impacts to delay ecological recovery.

2.5.4 Natural England expects Local Plans to demonstrate that development will not result in adverse effects on the integrity of Habitats Sites, either alone or in combination with other plans and projects, and that appropriate mitigation and policy measures are incorporated where necessary.

2.5.5 This guidance is underpinned by earlier Natural England Internal Guidance, as outlined below.

NATURAL ENGLAND'S INTERNAL GUIDANCE

2.5.6 In June 2018, Natural England published guidance[13] on their approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations. The document draws upon Annex F of the Design Manual for Roads and Bridges[14] (DMRB) (now withdrawn) but takes into account the Wealden Judgement (see Appendix A) and need to assess 'in-combination' effects on Habitats sites as a result of air pollution.

[13] Natural England (June 2018) Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations. Available online: http://publications.naturalengland.org.uk/publication/4720542048845824. Accessed August 2026

[14] DMRB Standards For Highways https://www.standardsforhighways.co.uk. Accessed August 2026.

2.5.7 The guidance provides a framework around the assessment of road traffic emissions and subsequent effects on Habitats sites. Notably:

- Step 1 – Does the proposal give rise to emissions which are likely to reach a Habitats site;
- Step 2 – Are there qualifying features within 200m of a road sensitive to air pollution;
- Step 3 – Could the sensitive qualifying features of the site be exposed to emissions; and
- Step 4 – Application of the Screening Thresholds.
  - Step 4a: apply the threshold alone;
  - Step 4b: apply the threshold in-combination with emissions from other road traffic plans and projects; and
  - Step 4c: apply the threshold in-combination with emissions from other non-road plans and projects.
- Step 5: Advise on the need for Appropriate Assessment where thresholds are exceeded, either alone or in-combination.

2.5.8 The relevant thresholds in relation to Step 4 are as follows:

- Changes in AADT of 1,000 vehicles a day (or more); and/or
- Changes of 1% of the relevant Critical Load and/or Level as a result of the Plan/Project.

IAQM'S GUIDE TO THE ASSESSMENT OF AIR QUALITY IMPACTS ON DESIGNATED NATURE CONSERVATION SITES

2.5.9 The Guide to the Assessment of Air Quality Impacts on Designated Nature Conservation Sites[15] provides advice for ecologists relating to air quality assessments (AQAs), to evaluate the effects of air pollution on habitats and species, by increasing their understanding of the information provided by air quality specialists. The Guide focuses on the AQA process and no specific detail on the subsequent stage of the overall process, i.e. the assessment of the effects that air quality impacts may have on habitats and species, is provided in this guidance.

2.5.10 Updated DMRB (LA 115 – Habitats Regulations Assessment)

2.5.11 DMRB document LA 115 - Habitats Regulations Assessment[16] states that HRA shall include systematic collection, assessment, and reporting of the implications of highways projects on Habitats sites and shall be implemented forthwith on all projects involving HRA on the

[15] Holman et al (2020). *A guide to the assessment of air quality impacts on designated nature conservation sites – v1.1* Available online: https://iaqm.co.uk/text/guidance/air-quality-impacts-on-nature-sites-2020.pdf Accessed [20/11/2022]

[16] Highways England (November 2019) Design Manual for Roads and Bridges, LA115 – Habitats Regulations Assessment. Available at: https://standardsforhighways.co.uk/dmrb/search/e2fdab58-d293-4af7-b737-b55e08e045ae .

motorway and all-purpose trunk roads. In addition to identifying the habitats site designations to be considered within HRA and the format of reporting, the document sets out (principles and purpose) that:

- *The precautionary principle shall be applied in reporting through all HRA stages.*
- *Recourse to the precautionary principle may be relevant when there:*
  1. *are "potentially negative effects"; or*
  2. *is "insufficiency of the data, which makes it impossible to determine with sufficient certainty the risk in question".*
- *Site conservation objectives should prevail where there is uncertainty.*
- *Adverse effects should be reported in the HRA in the absence of evidence to the contrary.*

CIEEM ADVISORY NOTE: ECOLOGICAL ASSESSMENT OF AIR QUALITY IMPACTS

2.5.12 This guidance from the Chartered Institute of Ecology and Environmental Management (CIEEM) [17] is intended to take ecologists (and air quality specialists) through the issues that they should consider in order to make an informed judgement as to the ecological effects of changes in pollution concentrations and deposition rates. The approaches set out build on the advice and guidance from Natural England and IAQM, but focus on the ecologist role to interpret the numerical output of air quality assessments to reach evidence-based conclusions on ecological significance.

2.5.13 Additional guidance

2.5.14 Multiple sources of guidance are available to HRA practitioners which are specific to interpretation of assessment processes or technical areas of assessment. Where relevant, these are cited within this report.

[17] CIEEM (January 2021) *Advisory Note: Ecological Assessment of Air Quality Impacts.* Available online: https://cieem.net/resource/advisory-note-ecological-assessment-of-air-quality-impacts/#:~:text=Advisory%20Note%3A%20Ecological%20Assessment%20of%20Air%20Quality%20Impacts.,of%20changes%20in%20pollution%20concentrations%20and%20deposition%20rates Accessed [20/11/22].

3 Methodology

3.1.1 This report presents the findings of the Screening undertaken as part of Stage 1 of the HRA process to establish whether or not the likely impacts of the RBKT Local Plan could have LSE on Habitats sites. For those sites where LSE cannot be ruled out, the report details Stage 2 of the HRA process, Appropriate Assessment.

Screening (Stage 1)

3.1.2 This document provides this information by undertaking the following steps:

- determining whether the plan is directly connected with, or necessary for, the management of applicable Habitats sites;
- describing the plan impacts that may have the potential for significant effects upon applicable Habitats sites;
- describing the potential pathways of impacts, both alone and in-combination with other plans and projects; and
- excluding Habitats Sites where it can be objectively concluded that there will be no likely significant effects.

3.1.3 The precautionary principle is applied at all stages of the HRA process. In relation to screening this means that projects and plans where effects are considered likely and those where uncertainty exists as to whether effects are likely to be significant must be subject to the second stage of the HRA process, Appropriate Assessment.

3.1.4 The first step of the review is to establish whether the RBKT Local Plan should be subject to HRA.

3.1.5 Depending on the conclusion of this step, the assessment progresses to information gathering; in particular the identification of Habitats sites which will likely require consideration and on which background information is collated. This information includes the qualifying features of these sites, the conservation objectives and the sensitivities of those sites.

3.1.6 It is necessary to consider all the Habitats sites that form part of the NSN (SACs, SPAs and proposed or candidate SPAs or SACs, expanded by the NPPF to include listed and proposed Ramsar sites, and site required for compensation) within a broad area or ZoI of the Local Plan and the specific policies therein.

3.1.7 The ZoI is defined by the potential effects arising from the project or plan and the available pathways for those effects to reach and impact the interest features of Habitats sites.

3.1.8 In order to identify all strategic corridors where potential direct, indirect and in-combination effects could reasonably be considered possible, a ZoI buffer is set up around the primary activities, or in this case Policies, which are likely to affect the qualifying features of Habitats sites.

3.1.9 As part of the information gathering stage, in the assessment of Local Plans, consideration is generally given to the air quality sensitivities of these Habitats sites, specifically their qualifying features, to changes in both NOx and NH_3 concentrations and nitrogen (N) deposition and then consideration of these changes in relation to the Critical Level and relevant Critical Loads[18].

3.1.10 Critical Levels are used to estimate the exposure of sensitive vegetation and ecosystems to some important airborne pollutants, below which significant harmful effects are not expected to occur. They are not habitat specific, as with Critical Loads, but have been set to cover broad vegetation types. These levels have been adopted by the European Union and the United Nations Economic Commissions for Europe (UNECE) and are used as regulatory standards and are expressed in units of $\mu g/m^3$ (micrograms per cubic metre).

3.1.11 In addition to the direct effect of pollutant concentrations in the air, vegetation can also be affected by the deposition of pollutants and particles onto both the ground and vegetation. Close to roads, N deposition can be of concern for sensitive ecological sites as it can result in a variety of adverse effects depending on the habitats present (e.g. interfering with photosynthesis, increasing acidification, altering species composition etc).

3.1.12 The final element of the information gathering stage is to review the availability of relevant data sets and sources which will form the evidence base of the assessment of the Local Plan policies alone and in-combination with other relevant plans and projects. Information on sources of HRA guidance are given in Section 2.5 and the legislative and policy background including the relevant CJEU rulings, are given in Appendix A.

Appropriate Assessment (Stage 2)

3.1.13 The appropriate assessments are an extension of the assessment processes undertaken at the screening stage, with significant effects examined to determine whether there will be any adverse effects on the integrity of any Habitats Sites.

3.1.14 It should be noted that the judgement of the court in Case C-258/11 (Sweetman v An Bord Pleanála and others) states that that "*a plan or project…will adversely affect the integrity of that site if it is liable to prevent the lasting preservation of the constitutive characteristics of the site that are connected to the presence of a priority natural habitat whose conservation was the objective justifying the designation of the site in the list of SCIs, in accordance with*

[18] Critical Loads and Levels are metrics used for assessing the risk of air pollution impacts to sensitive vegetation and ecosystems.

the directive. The precautionary principle should be applied for the purposes of that appraisal".

3.1.15 Results of the Appropriate Assessment are set out in **Section 9**.

Data Sources and Context

3.1.16 The screening considers the baseline condition of Habitats Sites and their interest features[19], including (where reported) data on:

- the site boundaries and the boundaries of the component SSSIs;
- the conservation objectives;
- information on the attributes of the Habitat Sites that contribute to and define their integrity;
- the condition, vulnerabilities and sensitivities of the sites and their interest features, including known pressures and threats;
- the approximate locations of the interest features within each site (if reported); and
- designated or non-designated 'functional habitats' (if identified).

3.1.17 These data are derived from, where available / relevant:

- the most recent JNCC-hosted GIS datasets;
- the Standard Data forms for SACs and SPAs and Information Sheets for Ramsar sites;
- Article 12 and 17 reporting;
- the published site conservation objectives;
- Supplementary advice to the conservation objectives (SACO) where available[20];
- Site Improvement Plans (SIPs); and
- the supporting Site of Special Scientific Interest's favourable condition tables where relevant and where no SACOs applicable to the features are available.

3.1.18 For SPAs, the qualifying features are taken as those identified on the most recent JNCC datasets and citations, or Natural England conservation objectives sheets, where these post-date the most recent SPA Review (i.e. it will be assumed that any amendments suggested by the SPA review have been made) unless otherwise explicitly identified by NE.

[19] The term 'interest features' is often used interchangeably with 'qualifying features', but is more appropriately used as a broader term covering the qualifying species and other within-site features that may be relevant to site integrity, particularly 'typical species' (for SACs) and within-site supporting habitats for mobile species.

[20] Natural England has published '*Supplementary advice on conserving and restoring site features*' for most European sites in England which describe in more detail the range of ecological attributes which are most likely to contribute to a site's overall integrity, and qualitative or quantitative targets for each attribute.

3.1.19 Where possible, the site data are used to identify other features that may be relevant to site integrity, particularly 'typical species' (for SACs), within-site supporting habitats, and non-Habitats Site or non-designated 'functionally linked habitats'.

3.1.20 A typical species is broadly described by European Commission guidance as being any species (or community of species) which is particularly characteristic of, confined to, and/or dependent upon the qualifying Annex I habitat feature at a particular site. This may include those species which:

- are critical to the composition or structure of an Annex I habitat (e.g. constant species identified by the National Vegetation Classification (NVC) community classification);
- exert a critical positive influence on the Annex I habitat's structure or function (e.g. a bioturbator (mixer of soil/sediment), grazer, surface borer or predator);
- are consistently associated with, and dependent upon, the Annex I habitat feature for specific ecological needs (e.g. feeding, sheltering), completion of life-cycle stages (e.g. egg-laying) and/or during certain seasons/times; or
- are particularly distinctive or representative of the Annex I habitat feature at a particular site.

3.1.21 Within-site supporting habitats are those which support the population(s) of the qualifying species, and which are therefore critical to the integrity of the feature.

3.1.22 Functionally linked habitats or 'functionally linked land' (FLL) are generally taken to be habitats or features outside a Habitat Site boundary that are important or critical to the functional integrity of the site's habitats and / or its qualifying features. These might include, for example:

- 'buffer' areas around a site (e.g. dense scrub areas preventing public access; areas of land that reduce the effects of agricultural run-off; etc.); or
- specific features or habitats relied on by mobile species during their lifecycle (e.g. high-tide roosts for waders; significant maternity colonies for bats known to hibernate within a SAC; areas that are critical for foraging or migration; etc), recognising that 'functionally-linked' is not intended as a speculative catch-all covering any habitat that might be occasionally used by, or suitable for, a particular species[21].

[21] Case law notes that such land should be necessary to the conservation of the protected habitat types and species *(Holohan v An Bord Pleanala C-461/17)* or play an important role in maintaining or restoring the population of qualifying species at favourable conservation status.

Conservation Objectives

3.1.23 Conservation Objectives benchmark Favourable Conservation Status (FCS) for each feature. Guidance[22] from the UK Statutory Nature Conservation Bodies (SNCBs) provides a broad characterisation of FCS, stating that it "*relates to the long-term distribution and abundance of the populations of species in their natural range, and for habitats to the long-term natural distribution, structure and functions as well as the long-term survival of its typical species in their natural range. It describes a situation in which individual habitats and species are maintaining themselves at all relevant geographical scales and with good prospects to continue to do so in the future*".

3.1.24 With regard to the qualifying features and information on vulnerability of the Habitats sites detailed in Appendix B, the broad conservation objectives for SACs in England are to:

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

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

3.1.25 And for SPAs in England are to:

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

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

[22] JNCC (2018). *Favourable Conservation Status: UK Statutory Nature Conservation Bodies Common Statement* [online]. Available at: https://data.jncc.gov.uk/data/b9c7f55f-ed9d-4d3c-b484-c21758cec4fe/FCS18-InterAgency-Statement.pdf. [Accessed March 2022].

3.1.26 Specific conservation objectives for Ramsar sites are not currently available, however the conservation objectives for Ramsar sites can be taken to be the same as for the corresponding SPA/SAC where these sites overlap.

In-Combination Assessment

3.1.27 It is a requirement of the Habitats Regulations to consider the effects of projects or plans "in combination" at the screening stage. Articles 24, 63 and 105 of the Habitats Regulations require Natural England and other competent authorities to consider the effects of plans or projects alone and in-combination with other plans or projects. The 'in-combination' requirement is undertaken in order to make sure that prior to their authorisation the effects of numerous proposals, which alone would not result in a significant effect, are further assessed to determine whether their combined effect would be significant enough to require more detailed assessment.

3.1.28 The landmark Waddenzee judgment provides a clear interpretation of the legislation. Paragraphs 53 and 54 of the Judgment state:

3.1.29 *"according to the wording of that provision [Article 6(3) of the Habitats Directive] an appropriate assessment of the implications for the site concerned of the plan or project must precede its approval and take into account the cumulative effects which result from the combination of the plan or project with other plans or projects in view of the sites conservation objectives. Such an assessment therefore implies that all the aspects of the plan or project which can, individually or in combination with other plans or projects, affect those objectives must be identified in the light of the best scientific knowledge in the field. ....."*

3.1.30 Table 3-1 outlines the types of plans and projects that should be considered in an in-combination assessment:

Table 3-1 - Types of plans and projects considered at "In-combination" assessment

▪ The incomplete or non-implemented parts of plans or projects that have already commenced;
▪ Plans or projects given consent or given effect but not yet started;
▪ Plans or projects currently subject to an application for consent or proposed to be given effect;
▪ Projects that are the subject of an outstanding appeal;
▪ Ongoing plans or projects that are the subject of regular review;

▪ Any draft plans being prepared by any public body;
▪ Any proposed plans or projects published for consultation prior to application;
▪ Projects being proposed or being undertaken by a competent authority itself which require no external authorisation.

3.1.31 In line with relevant CJEU rulings (Appendix A) mitigation measures cannot be included in HRA Stage 1 (Screening). As this was previously a common practice, many HRAs will have concluded no LSE on Habitats sites, based on the likely effectiveness of mitigation measures. The outcome of this is that preceding plan-level HRAs can be unreliable in terms of adopted conclusions of 'no LSE'.

3.1.32 Based on this complexity and need for consistency in the assumptions relating to mitigation, a precautionary approach has been adopted when considering the HRA conclusions of overlapping plans and projects in-combination.

4 Review Results

4.1 Is HRA required?

4.1.1 The review looked to specifically answer each of the questions set out in the HRA review methodology. It should be noted that the level of detail of the Local Plan only allows for an anticipated assessment of the need for HRA based on experience of similar plans and projects (see Table 4-1 below).

Table 4-1 – Is HRA required?

	Question	Response
1	Is the whole of the plan directly connected with or necessary to the management of a Habitats site for nature conservation purposes?	No
2	Is the plan a 'strategic development plan' or 'local development plan' or 'supplementary guidance' or a core path plan or a revision thereof?	Yes
3	Does the plan provide a framework for deciding applications for project consents and / or does it influence decision makers on the outcome of applications for project consents?	Yes
4	Does the plan contain a programme, or policies, or proposals which could affect one or more particular Habitats site?	Yes
5	Is the plan a general statement of policy showing only the general political will or intention of the plan-making body, and no effect on any particular Habitats site can reasonably be predicted?	No

4.1.2 When the answer to either questions (1) or (5) is 'no', but the answer to any of questions (2), (3) or (4) is 'yes', then the requirement for further HRA is identified.

4.1.3 In this case, the answers to questions (1) and (5) are both 'no', while the answers to questions (2) to (4) are all 'yes'. It is therefore confirmed, based on the availability of current information, that the RBKT Local Plan does require a HRA.

5 Identification of Habitats sites

5.1.1 The following section provides a summary of the results of the review of Habitats sites data which will form the baseline for subsequent stages of HRA.

Zone of Influence

5.1.2 RBKT has provided an indicative list of site allocations to meet the housing needs of the Borough. These have been used as the primary basis on which to set up the ZoI and assume:

- dispersal of development across the Borough as shown on supplied plans; and
- delivery of 1,140 dwellings per annum[23] around the RBKT site allocations.

5.1.3 The ZoI are set up to reflect the potential impact or effects pathways of the qualifying features of the Habitats sites. A ZoI of 10km has therefore been applied around the Borough boundary to identify all habitats sites in proximity, and then refined to within 10km of allocated sites identified within the Local Plan. The premise of this approach is that 10km represents the average trip length as noted in the National Transport Survey[24] and as included in in the Joint Nature Conservation Committee (JNCC) guidance for air quality[25] and is considered equally suitably precautionary to identify potential impacts from other pressures or threats to Habitats sites.

Sites Identified

5.1.4 Six Habitats sites, lie within the potential ZoI for the RBKT Local Plan, comprising two SPAs, three SACs and one Ramsar site (see Figure 5-1 and Appendix B). The names and designations are stated below:

- Wimbledon Common SAC
- Richmond Park SAC
- Mole Gap to Reigate Escarpment SAC
- Thames Basin Heaths SPA
- South West London Waterbodies SPA
- South West London Waterbodies Ramsar site

[23] This number is based on Policy KH1 which sets out a target of 17,100 homes between 2028/29 and 2043 e.g a 15-year period. Detailed information was not available on the delivery year for each allocation and therefore an even split across the 15 years was applied.
[24] As cited within the Air quality and emissions mitigation guidance for Sussex (2020)
[25] Chapman, C. and Kite, B. (2021). Guidance on Decision-Making Thresholds for Air Pollution. JNCC Report No.696 (Main Report), JNCC, Peterborough, ISSN 0963-8091 (Note: Plan-level limitation of use is set out in this document; advice on ZoI has been applied)

5.1.5 The reasons for designation of the Habitats sites and their known vulnerabilities are given in Appendix B, which has been collated from the Natura 2000 standard data forms, the Natural England Site Improvement Plans for SACs and SPAs and Ramsar Information Sheet (RIS) for the Ramsar site.

5.1.6 The proposed site allocations and their distance in relation to each of the Habitats sites are given in Table 5-1. There are 55 allocated sites, distributed across the borough. The site allocations are grouped with the following prefixes for each neighbourhood:

- KNK – Kingston and North Kingston
- NOM – New and Old Malder
- SOB – South of the Borough
- SUR – Surbiton

N

Key

- Reg19 Site Allocations
- Royal Borough of Kingston upon Thames
- 10km Search Area
- Special Protection Area
- Special Area of Conservation
- Ramsar Site

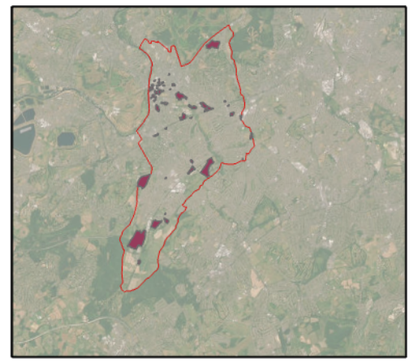
Richmond Park

Wimbledon Common

South West London Waterbodies

Thames Basin Heaths

Mole Gap to Reigate Escarpment



0 2,000 4,000 6,000 Metres

wsp

Client: The Royal Borough of Kingston Upon Thames

Project: The Royal Borough of Kingston Upon Thames IIA

Title: Proposed Site Allocations 2026 and Habitat Sites within 10km

Drawing No:	Figure 5-1	Drawn:	ES
Date:	August 2026	Checked:	VD
Scale:	1:125,000 @ A3	Approved:	KT

Table 5-1 - Proximity of proposed site allocations to Habitats sites within 10km of RBKT's administrative boundary

New Site ID	Site Name	Ward	Area (ha)	Distance to Habitat Sites (km)					Total no. Habitats sites within 10km	Quantum of units proposed per allocated site
				Richmond Park SAC	Wimbledon Common SAC	South West London Waterbodies SPA and Ramsar site	Thames Basin Heaths SPA	Mole Gap to Reigate Escarpment SPA		
KNK1	Seven Kings Car Park, Sury Basin	Canbury Gardens Ward	0.49	1.35	3.66	5.64	14.27	15.17	4	225
KNK2	Canbury Place Car Park, and 12-52 Kingsgate Road	Kingston Gate Ward	1.07	1.20	3.48	5.76	14.31	15.13	4	265
KNK3	Canbury Business Park and Former Regal Cinema	Kingston Gate Ward	1.00	1.08	3.32	5.93	14.4	15.13	4	250
KNK4	Murray House, 142 Acre Road	Kingston Gate Ward	0.36	0.62	2.95	6.37	14.89	15.65	4	45
KNK5	Bentall Centre Car Parks A and B, Steadfast Road	Kingston Town Ward	0.77	1.54	3.81	5.47	14.04	14.96	4	175
KNK6	Cromwell Road Bus Station, Cromwell Road	Kingston Town Ward	0.40	1.15	3.33	5.95	14.36	15.05	4	90
KNK7	Thames Side Wharf, Vicarage Lane	Kingston Town Ward	0.28	1.64	3.90	5.42	13.98	14.91	4	95
KNK8	John Lewis, Wood Street	Kingston Town Ward	1.31	1.63	3.88	5.36	13.89	14.81	4	285
KNK9	Bishops Palace House and 19-31 Thames Street	Kingston Town Ward	0.70	1.75	3.99	5.33	13.79	14.70	4	135
KNK10	67-76 Clarence Street and 14-42 Fife Road	Kingston Town Ward	0.43	1.47	3.71	5.66	14.1	14.85	4	100
KNK11	Cattle Market Car Park and Fairfield Bus Station	Kingston Town Ward	1.92	1.38	3.49	5.83	14.06	14.70	4	300

New Site ID	Site Name	Ward	Area (ha)	Distance to Habitat Sites (km)					Total no. Habitats sites within 10km	Quantum of units proposed per allocated site
				Richmond Park SAC	Wimbledon Common SAC	South West London Waterbodies SPA and Ramsar site	Thames Basin Heaths SPA	Mole Gap to Reigate Escarpment SPA		
KNK12	Eden Quarter, Lady Booth Road, Kingston	Kingston Town Ward	1.92	1.45	3.61	5.68	13.92	14.71	4	645
KNK13	Eden Walk Shopping Centre, Eden Walk	Kingston Town Ward	1.84	1.59	3.75	5.53	13.82	14.79	4	560
KNK14	Conquest House and Kings Place, Wood Street	Kingston Town Ward	0.51	1.36	3.60	5.69	14.14	15.01	4	130
KNK15	Ashdown Road Car Park and 48-60 Eden Street	Kingston Town Ward	0.49	1.60	3.71	5.67	13.93	14.62	4	270
KNK16	Guildhall 1 and Guildhall 2, High Street	Kingston Town Ward	1.26	1.83	3.98	5.38	13.65	14.44	4	320
KNK17	Lever House, 3 St James Road	Kingston Town Ward	0.31	1.83	3.94	5.53	13.75	14.48	4	155
KNK18	The Malthouse and River Reach, 25-35 High Street	Kingston Town Ward	0.26	2.01	4.15	5.31	13.55	14.37	4	60
KNK19	Bittoms Car Park, The Bittoms	Kingston Town Ward	0.52	1.96	4.02	5.44	13.53	14.23	4	235
KNK20	Bryson House (Hogsmill Yard), Horace Road	Kingston Town Ward	0.26	1.81	3.59	6.03	13.87	14.32	4	60
KNK21	Kingston University Knights Park Campus and Middle Mill	Kingston Town Ward	2.01	1.78	3.62	5.77	13.75	14.24	4	N/A non-residential
KNK22	Taverner House and Telephone Exchange	Norbiton Ward	1.23	0.86	2.88	6.42	14.67	15.15	4	470

New Site ID	Site Name	Ward	Area (ha)	Distance to Habitat Sites (km)					Total no. Habitats sites within 10km	Quantum of units proposed per allocated site
				Richmond Park SAC	Wimbledon Common SAC	South West London Waterbodies SPA and Ramsar site	Thames Basin Heaths SPA	Mole Gap to Reigate Escarpment SPA		
KNK23	129-137 London Road, Kingston	Norbiton Ward	0.28	1.15	3.14	6.26	14.47	14.99	4	50
KNK24	Cambridge Road Estate, Cambridge Road	Norbiton Ward	9.01	1.19	2.91	6.51	14.41	14.60	4	1,335
KNK25	Kingston College, Kingston Hall Road	Kingston Town Ward	0.21	1.93	4.02	5.51	13.66	13.37	4	95
KNK26	Kingston Railway Station	Kingston Town Ward	0.56	1.28	3.52	5.74	14.27	15.03	4	310
KNK27	Kingston University Kingston Hill Campus	Coombe Hill Ward	15.72	0.12	0.43	8.21	17.06	16.95	4	120
KNK28	Kingston University Penrhyn Road Campus	Kingston Town Ward	3.34	2.13	4.12	5.51	13.3	13.87	4	N/A non-residential
KNK29	Land to the West of Kingston College Creative Industries Centre	Canbury Gardens Ward	0.40	1.15	3.46	5.87	14.43	15.23	4	140
KNK30	St John's Industrial Estate, Kingston Road	Green Lane & St James Ward	9.10	1.92	2.37	7.58	14.85	14.41	4	585
KNK31	Land at Hampden Road and 194 Cambridge Road	Norbiton Ward	0.71	1.39	2.80	6.92	14.62	14.68	4	N/A non-residential
SUR01	Chiltern Works, Berrylands	Berrylands Ward	0.34	2.42	3.26	7.07	14.15	13.66	4	50
SUR02	Land at Clayhill Halls of Residence, Burney Road	St Mark's & Seething Wells Ward	0.89	2.36	3.64	6.58	13.79	13.70	4	135

New Site ID	Site Name	Ward	Area (ha)	Distance to Habitat Sites (km)					Total no. Habitats sites within 10km	Quantum of units proposed per allocated site
				Richmond Park SAC	Wimbledon Common SAC	South West London Waterbodies SPA and Ramsar site	Thames Basin Heaths SPA	Mole Gap to Reigate Escarpment SPA		
SUR03	Surbiton Station Car Park, Glenbuck Road	Surbiton Hill Ward	2.86	3.26	4.87	5.44	12.33	12.65	4	175
SUR04	Surbiton Telephone Exchange	Surbiton Hill Ward	0.47	2.94	4.42	5.95	12.97	13.07	4	120
SUR05	Tolworth Tower, Tolworth Broadway	Tolworth Ward	1.32	4.38	4.99	7.42	12.95	11.65	4	360
SUR06	Land at Hogsmill Sewage Treatment Works Site 2	St Mark's & Seething Wells Ward	4.14	2.17	3.38	6.70	13.79	13.72	4	205
NOM01	CI Tower & Car Park, Dukes Avenue	New Malden Village Ward	0.43	2.81	2.02	8.85	15.85	15.01	4	90
NOM02	Cocks Crescent, New Malden	Coombe Vale Ward	2.37/0.46	3.00	2.32	8.97	15.68	13.89	4	255
NOM03	Hays House (40-50 Coombe Road), New Malden	New Malden Village Ward	0.37	2.55	1.85	8.70	15.89	14.53	4	75
NOM04	Burlington Retail Park, Burlington Road	New Malden Village Ward	1.24	3.39	2.53	9.43	15.96	13.76	4	205
NOM05	Former Worcester Park Tavern	Old Malden Ward	0.24	5.10	4.51	9.79	15.02	12.01	4	45
NOM06	Gasholder, West Barnes Lane, Motspur Park (MOL)	Motspur Park & Old Malden East Ward	2.22	4.47	3.36	9.94	15.79	14.11	4	440

New Site ID	Site Name	Ward	Area (ha)	Distance to Habitat Sites (km)					Total no. Habitats sites within 10km	Quantum of units proposed per allocated site
				Richmond Park SAC	Wimbledon Common SAC	South West London Waterbodies SPA and Ramsar site	Thames Basin Heaths SPA	Mole Gap to Reigate Escarpment SPA		
NOM07	Land at Hogsmill Sewage Treatment Works Site 1 (MOL)	Norbiton Ward	4.00	1.79	2.82	7.01	14.48	14.36	4	200
NOM08	Kingston University Tolworth Court	King George's & Sunray Ward	16.25	4.45	4.61	8.19	13.58	12.26	4	N/A non-residential
SOB01	Signal Park, Hook Rise South	King George's & Sunray Ward	3.99	4.69	5.23	7.49	12.52	11.35	4	965
SOB02	Hollywood Bowl, Kingston Road	King George's & Sunray Ward	0.36	4.69	5.28	7.60	12.87	11.49	4	105
SOB03	Kingston Business Park, Fullers Way South	Hook & Chessington North Ward	0.36	5.21	6.26	6.63	11.5	10.86	4	55
SOB04	St Mary's Hall, Church Lane, Chessington	Hook & Chessington North Ward	0.27	6.90	7.75	7.45	10.60	9.31	5	15
SOB05	Tolworth Railway Station	King George's & Sunray Ward	0.61	4.82	5.32	7.65	12.72	11.22	4	105
SOB06	Chessington World of Adventures Resort	Chessington South & Malden Rushett Ward	76.78	7.63	8.72	6.71	8.13	7.19	6	N/A non-residential
SOB07	Green Lane Farm Kennels, Green Lane	Chessington South & Malden Rushett Ward	2.56	7.08	7.98	7.54	10.45	8.94	5	25

New Site ID	Site Name	Ward	Area (ha)	Distance to Habitat Sites (km)					Total no. Habitats sites within 10km	Quantum of units proposed per allocated site
				Richmond Park SAC	Wimbledon Common SAC	South West London Waterbodies SPA and Ramsar site	Thames Basin Heaths SPA	Mole Gap to Reigate Escarpment SPA		
SOB08	Land at Clayton Road, Chessington	Hook & Chessington North Ward	21.34	5.22	6.54	5.55	10.27	10.15	4	1,440
SOB09	Former Chessington Golf Course, Garrison Lane	Chessington South & Malden Rushett Ward	10.61	7.22	8.12	7.21	9.79	8.53	6	265
SOB10	Silverglade Business Park, Leatherhead Road	Chessington South & Malden Rushett Ward	1.82	9.22	10.23	8.11	8.15	6.67	5	N/A non-residential

5.2 Information relating to potential effects on Habitats sites

5.2.1 Table 5-2 overleaf summarises pressures and threats listed on the Site Improvement Plans (SIPs) for SPAs and SACs and factors adversely affecting the site's ecological character from the RIS for the Ramsar site that will need to be considered during screening and appropriate assessment (if required) of the Local Plan.

Table 5-2 - Pressures and threats listed on Habitats sites SIPs

Impacts highlighted as red should be given primary consideration in screening and appropriate assessment of the Local Plan policies, and those highlighted green are less likely to be considerations in screening and appropriate assessment of the Local Plan (note that abbreviations[26] are those pressures and threats listed in the JNCC data sheet for the respective Habitats site).

Site Name	Air pollution: impact of atmospheric nitrogen deposition	Public access/ disturbance	Hydrological changes	Habitat fragmentation	Inappropriate Management	Invasive species	Changes in species distribution	Disease	Fisheries : Fish stocking	Military	Forestry and woodland management	Natural Changes to site conditions	Feature location/ extent/ condition unknown	Undergrazing	Wildfire/ arson
South West London Water bodies SPA and Ramsar site		P/T			T – weed control	P/T (*Crassula helmsii*) T (Egyptian goose *Alopochen aegyptiaca)*	P/T		P			P/T			
Wimbledon Common SAC	P	P		T		T									
Thames Basin Heaths SPA	P/T	P/T	T	P	P (scrub control)	P/T				T	P		T	P	P
Mole to Reigate Escarpment SAC	T	T			P (scrub control) T (change in land management)			P/T							
Richmond Park SAC	No current issues affecting the Habitats site feature(s) have been identified for this site														

[26] P = Pressure, T = Threat

6 Approach to Stage 1 Screening

6.1 Guidance

6.1.1 Government guidance and Court rulings have confirmed that the level of detail in the HRA of a plan, whilst meeting the relevant requirements of the Habitats Regulations, should be appropriate to the level (or tier) of plan or project that it addresses.

6.1.2 The guidance referred to in Section 2.5 has been referred to in undertaking the Stage 1 screening of the RBKT Local Plan policies. The approaches set out by the guidance have been interpreted to the level of detail available within the objectives, policies and description of projects based on the descriptions contained within the Local Plan, noting that at its current stage, the Plan is a high-level document. At a greater level of detail, and as normally required with specific project level HRAs for example, the HRA stages have more specific data requirements.

6.2 Air Quality Input

6.2.1 The sensitivity of Habitats sites to changes in air quality is fundamental to the Stage 1 screening of the RBKT Local Plan policies. The sensitivity of the identified Habitats sites has been informed by the review of identified pressures and threats (Table 5-3) and a review of the Air Pollution Information Service (APIS)[27].

6.2.2 In many locations across the UK, the Critical Load for N deposition is exceeded due to high background concentrations (reflecting that there are a variety of sources contributing to total N deposition including agriculture which in many locations represents the dominant source). This results in such Habitat sites being particularly sensitive to changes in air quality, including those that may arise due to forecast growth on the local road network, as there is no available 'headroom' before which adverse impacts may occur.

6.2.3 Where suitable traffic data are available, Stage 1 Screening would typically comprise a review of the traffic data and application of the identified Screening thresholds[28], both 'alone' and 'in-combination'. At the time of assessment, traffic data was unavailable to allow a traffic data review to be undertaken. Therefore, at this stage, the assessment of the likelihood for LSE at the identified Habitats sites due to changes in air pollution has comprised a review of:

[27] Air Pollution Information Service. Available at Air Pollution Information System | Air Pollution Information System (apis.ac.uk)

[28] As contained within the guidance documents produced by Natural England (July 2018) and the IAQM (May 2020).

- The proximity of the proposed site allocations to the nearest Habitats site/s;
- The likely trip generation per allocation (taking into account the number of units proposed); and
- The distance of the Habitats site to the nearest road likely to be affected/used by traffic from the proposed allocations.

7 HRA Stage 1 Screening of the Local Plan Policies

7.1.1 The pressures and threats set out in Table 5-2 have been reviewed for those likely to arise from the policies within the Local Plan and, in particular, the proposed delivery of dwellings within the Borough. Those considered relevant to this type and scale of development have been identified as:

- air pollution: impact of atmospheric nitrogen deposition;
- public access/ disturbance/ recreational pressures;
- hydrological changes; and
- Urbanisation (this includes a range of pressures / threats such as wildfire / arson, vandalism, cat predation, fly-tipping (especially garden waste).

7.1.2 Although not specifically listed as a pressure or threat, consideration has also been made with regards to functionally inked land (FLL) where the Habitats site is designated for a mobile species.

7.1.3 The pressures and threats set out in Table 5-2 which are considered at this early stage to be unlikely to arise from the policies as presented and the draft development allocations (except where this directly results secondarily from the pressures and threats included above) and are not considered further in this screening exercise, are: habitat fragmentation; inappropriate management; invasive species; changes in species distribution; disease; fisheries: fish stocking; military; forestry and woodland management; natural changes to site conditions; under grazing; wildfire/ arson (as separate to public access/ disturbance or urbanisation).

7.1.4 Further information relating to those pressures and threats identified as relevant to the RBKT Local Plan and the development allocation targets, including the Local Plan Preferred Options consultation with Natural England are also presented below.

7.2 POTENTIAL AIR QUALITY EFFECTS

7.2.1 Consideration has been given to the potential effect of changes in air quality within the identified Habitats sites, where they fall within the specified ZoI, with a particular focus on qualifying features, including:

- changes in NOx and NH_3 concentrations in relation to the Critical Levels for these pollutants; and
- Changes in N deposition in relation to the relevant Critical Loads.

CRITICAL LEVELS FOR NO_x AND NH_3

7.2.2 The relevant Critical Levels for NOx and NH_3 relating to the protection of vegetation and ecosystems are summarised in Table 7-1.

Table 7-1 - Relevant NO_x and NH_3 Critical Levels for the Protection of Vegetation and Ecosystems

Pollutant		Concentration ($\mu g/m^3$)	Averaging Period
Nitrogen oxides (NOx)		30	Annual Mean
		75	24-hours
Ammonia (NH_3)	**Lower Plants**	1	Annual Mean
	Higher Plants	3	Annual Mean

CRITICAL LOADS

7.2.3 In the UK, Critical Loads have been established for a wide range of habitat and vegetation types, reflecting the variation in ecosystem responses to N deposition and acid deposition. Details of the Critical Loads relevant to a specific habitat or designated site are available from the Air Pollution Information Systems (APIS) website[29]. In relation to Critical Loads, N deposition is expressed in units of kilograms of nitrogen per hectare per year (kg N/ha/yr). For acid deposition, the units are kilo-equivalents of nitrogen per hectare per year (keq N/ha/yr).

7.2.4 It is important to note that both N deposition and acid deposition are directly influenced by the ambient concentrations of NOx and NH_3, and when either or both of these ambient pollutants are elevated, the deposited quantities will be also.

7.2.5 Also important is the type of vegetation, with higher deposition rates occurring with tall vegetation - such as mature trees (referred to by APIS as 'forest') - than with short vegetation - such as grass and shrubs (referred to by APIS as 'meadow'). The Critical Load ranges that are assigned tall and short vegetation reflect this, with higher thresholds generally assigned to tall vegetation.

7.2.6 Relevant Critical Loads for the identified Habitats sites are provided in Appendix C.

[29] http://www.apis.ac.uk/

BASELINE CONDITIONS AT SITES WHERE AIR POLLUTION IS IDENTIFIED AS A PRESSURE AND/OR THREAT

7.2.7 Wimbledon Common SAC, Thames Basin Heaths SPA and Mole Gap to Reigate Escarpment SAC are Habitats sites where air pollution is cited as an identified pressure or threat. As per Table 5.2, air pollution is not identified to present either a pressure or threat to Richmond Park SAC or South West London Waterbodies SPA and Ramsar Site. However, due to the close proximity of Richmond Park SAC to RBKT, impacts arising from changes to air quality have been considered for this site. As South West London Waterbodies SPA and Ramsar site is located a greater distance away, and with air pollution not being listed as a pressure or threat, data for these Habitats sites is not cited below and they will not be considered further in this HRA with regards to air quality related LSE.

Wimbledon Common SAC

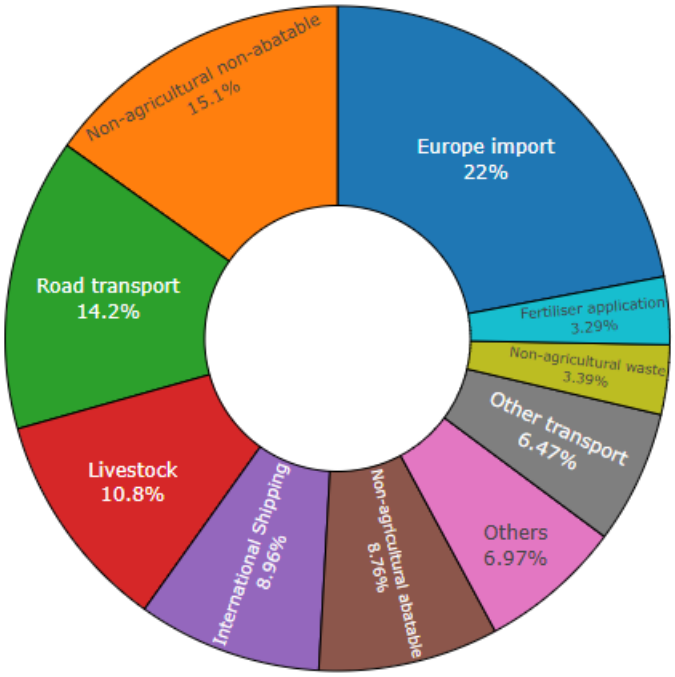
7.2.8 As set out on the APIS website and Appendix C, there are three relevant qualifying features of the SAC: stag beetle *Lucanus cervus*; Northern Atlantic wet heaths with *Erica tetralix* and European dry heaths.

7.2.9 With reference to APIS and details included in Appendix C, background annual mean NOx concentrations are below the Critical Level of 30µg/m^3 across the SAC, ranging between 21.55 and 25.42 µg/m^3 as estimates for 2023. Background annual mean NH_3 concentrations exceed the Critical Level of 1µg/m^3 for lower plants but are below the Critical Level of 3µg/m^3 for higher plants, with a maximum of 1.20µg/m^3 estimated for 2023. Background N deposition rates are estimated to be exceeding the lower Critical Load of 5kg N/ha/yr for heathland habitats, with an estimated maximum for 2023 of 11.62kg N/ha/yr and also the lower Critical Load of 10kg N/ha/yr for the woodland habitat, with an estimated maximum for 2023 of 20.36kg N/ha/yr. Acid deposition rates also exceed the Critical Loads ('min CL max N') for heathland and woodland habitats.

7.2.10 Whilst providing useful baseline context, background concentrations are representative of concentrations that can be experienced away from a pollution source. With increasing distance towards a pollution source, such as a busy road, pollutant levels will increase so that at the roadside, levels could be substantially higher than the background. In particular, NOx concentrations within 200m of the A3 and A219 could exceed the Critical Level. NH_3 concentrations are also likely to become elevated towards these roads.

7.2.11 At the SAC, road transport is estimated to account for 14.2% of total atmospheric nitrogen deposition (illustrated in Figure 7-1).

Figure 7-1 – Wimbledon Common SAC, sources ranked by total nitrogen deposition (kg N/ha/yr) from combined UK sources (ref. APIS, September 2026)

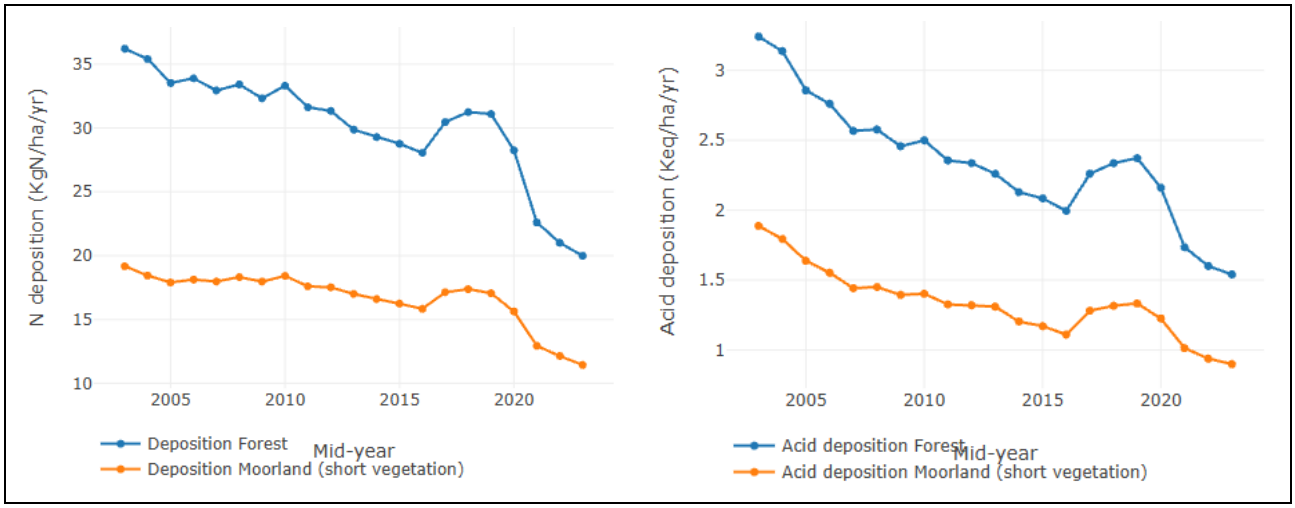


7.2.12 The historical trends in N deposition and acid deposition, based on modelling, are illustrated in Figure 7-2. The long-term trends are downwards, which aligns with actual reductions in NOx emissions over time, as reflected in Defra statistics[30].

7.2.13 Less clear is the long-term trend in NH_3, an important component of N deposition and acid deposition. According to Defra statistics[31], by far the greatest contributor is the agricultural sector, with road traffic making a relatively very minor and declining contribution.

[30] Emissions of air pollutants in the UK – Nitrogen oxides (NOx) - GOV.UK
[31] Emissions of air pollutants in the UK – Ammonia (NH3) - GOV.UK

Figure 7-2 – Wimbledon Common SAC, illustrated trends in N deposition and acid deposition rates (ref. APIS, September 2026)



7.2.14 For stag beetle, APIS reports that the feature itself is not sensitive to changes in nitrogen or acid deposition on the basis of *"No expected negative impact on species due to impacts on the species' broad habitat"* (broadleaved mixed and yew woodland). For the heathland habitats, this is not the case and there could be negative impacts.

Richmond Park SAC

7.2.15 As set out on the APIS website and Appendix C, there is one relevant qualifying feature of the SAC: stag beetle.

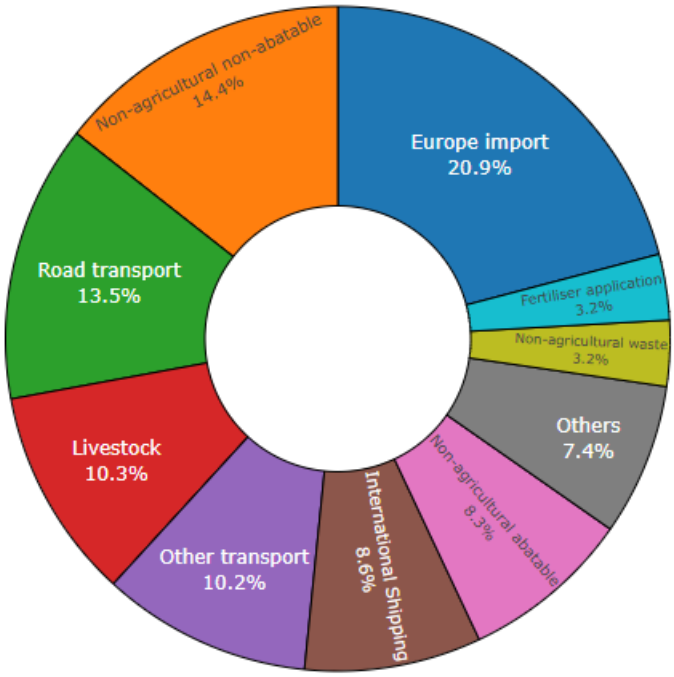
7.2.16 With reference to APIS and details included in Appendix C, background annual mean NOx concentrations are below the Critical Level of 30µg/m^3 across the SAC, ranging between 21.01 and 25.09 µg/m^3 as estimates for 2023. Background annual mean NH_3 concentrations are below the Critical Level of 3µg/m^3 for higher plants, with a maximum of 1.17µg/m^3 estimated for 2023. Background N deposition rates are estimated to be exceeding the lower Critical Load of 10kg N/ha/yr for the supporting broadleaved deciduous woodland habitat, with an estimated maximum for 2023 of 20.25kg N/ha/yr. Acid deposition rates also exceed the Critical Loads ('min CL max N') for the supporting habitat.

7.2.17 At the SAC, road transport is estimated to account for 13.5% of total atmospheric nitrogen deposition (illustrated in Figure 7-3).

7.2.18 Whilst providing useful baseline context, background concentrations are representative of concentrations that can be experienced away from a pollution source. With increasing distance towards a pollution source, such as a busy road, pollutant levels will increase so that at the roadside, levels could be substantially higher than the background. In-particular, NOx concentrations within 200m of the

A308 Kingston Hill and B351 Queens Road could exceed the Critical Level. NH_3 concentrations are also likely to become elevated towards these roads.

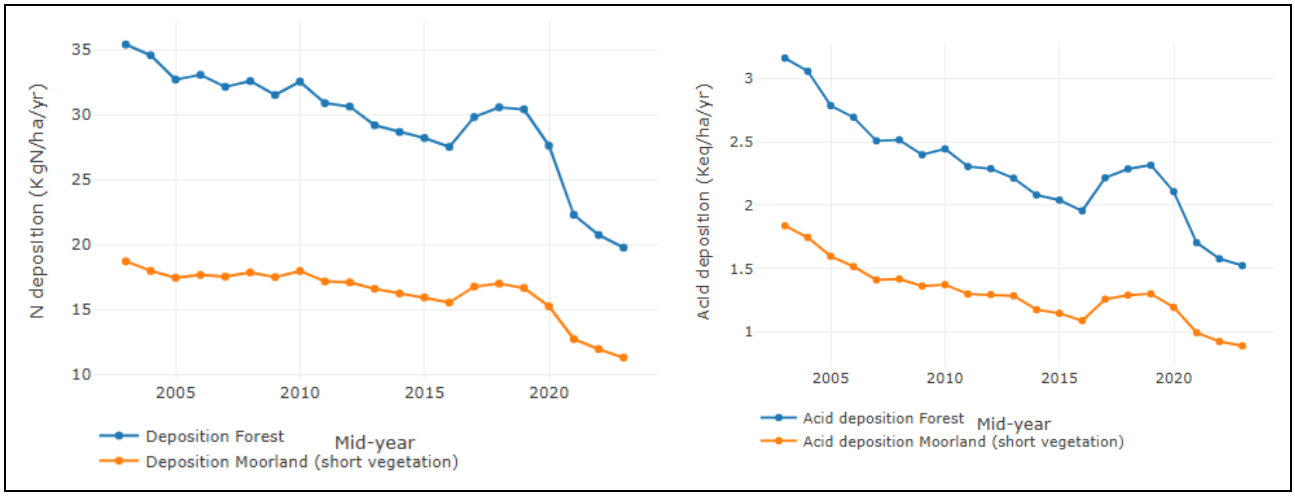
Figure 7-3 – Richmond Park SAC, sources ranked by total nitrogen deposition (kg N/ha/yr) from combined UK sources (ref. APIS, September 2026)



7.2.19 The historical trends in N deposition and acid deposition, based on modelling, are illustrated in Figure 7-4. The long-term trends are downwards, which aligns with actual reductions in NOx emissions over time, as reflected in Defra statistics[30].

7.2.20 Less clear is the long-term trend in NH_3, an important component of N deposition and acid deposition. According to Defra statistics[31], by far the greatest contributor is the agricultural sector, with road traffic making a relatively very minor and declining contribution.

Figure 7-4 – Richmond Park SAC, illustrated trends in N deposition and acid deposition rates (ref. APIS, September 2026)



7.2.21 For stag beetle, APIS reports that the feature itself is not sensitive to changes in nitrogen or acid deposition on the basis of *"No expected negative impact on species due to impacts on the species' broad habitat"* (broadleaved mixed and yew woodland).

Thames Basin Heaths SPA

7.2.22 As set out on the APIS website and included in Appendix C, the relevant qualifying features of the SPA are the bird species European nightjar *Caprimulgus europaeus*, woodlark *Lullula arborea* and Dartford warbler *Sylvia undata*.

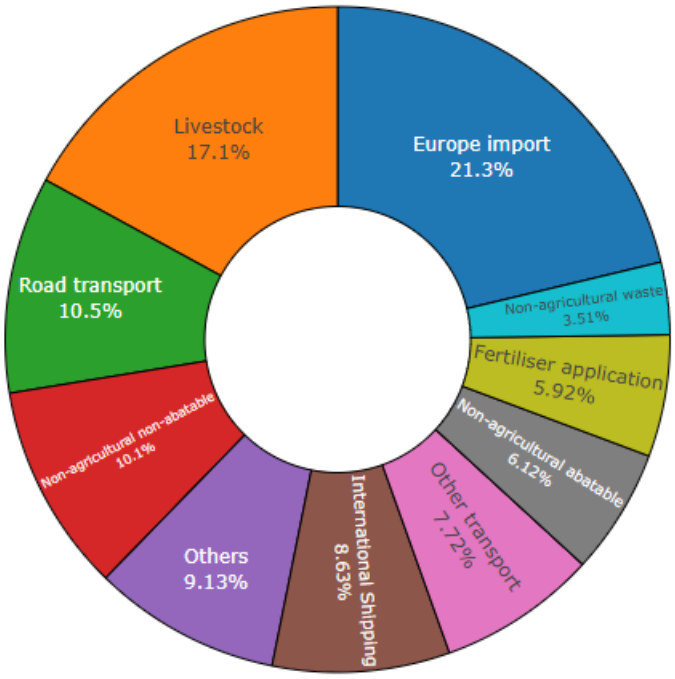
7.2.23 With reference to APIS and details included in Appendix C, background annual mean NOx concentrations are below the Critical Level of 30µg/m^3 across this part of the SPA, ranging between 12.68 and 21.66 µg/m^3 as estimates for 2023. Background annual mean NH_3 concentrations are just below the Critical Level of 1µg/m^3 for lower plants, with a maximum of 0.99µg/m^3 estimated for 2023. Background N deposition rates are estimated to be exceed the lower Critical Load of 5kg N/ha/yr for the supporting broad habitat defined as 'dwarf shrub heath' with a maximum estimated for 2023 of 10.16kg N/ha/yr, and the lower Critical Load of 5kg N/ha/yr for the supporting coniferous woodland habitat, with a maximum estimated for 2023 of 17.41kg N/ha/yr. Acid deposition rates also exceed the Critical Loads ('min CL max N') for these habitats, with a maximum of 1.31keq N/ha/yr estimated for 2023. The maximum background levels of all pollutants occur around the M25 Junction 10, reducing slightly for the area of the SPA (including areas adjacent to the A3) to the south.

7.2.24 Whilst providing useful baseline context, background concentrations are representative of concentrations that can be experienced away from a pollution source. With increasing distance towards a pollution source, such as a busy road,

pollutant levels will increase so that at the roadside, levels could be substantially higher than the background. In-particular, NOx concentrations within 200m of the M25 mainline, M25 Junction 10 and the A3 to the south of the junction could exceed the Critical Level. NH_3 concentrations are also likely to become elevated towards these roads.

7.2.25 At the SPA, road transport is estimated to account for 10.5% of total atmospheric nitrogen deposition (illustrated in Figure 7-5).

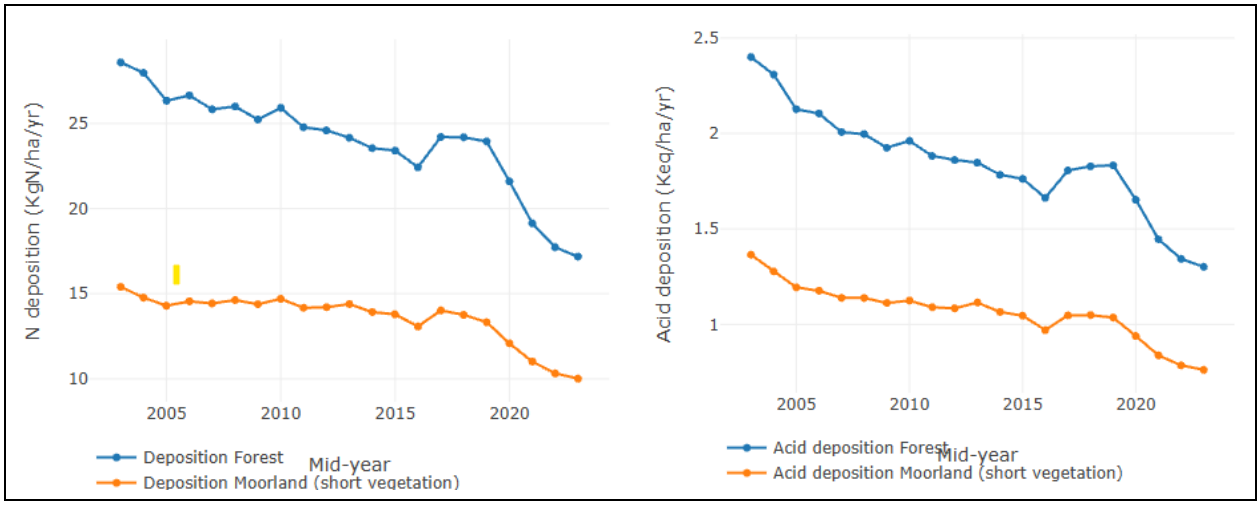
Figure 7-5 – Thames Basin Heaths SPA, sources ranked by total nitrogen deposition (kg N/ha/yr) from combined UK sources (ref. APIS, September 2026)



7.2.26 The historical trends in N deposition and acid deposition, based on modelling, are illustrated in Figure 7-6. The long-term trends are downwards, which aligns with actual reductions in NOx emissions over time, as reflected in Defra statistics[30].

7.2.27 Less clear is the long-term trend in NH_3, an important component of N deposition and acid deposition. According to Defra statistics[31], by far the greatest contributor is the agricultural sector, with road traffic making a relatively very minor and declining contribution.

Figure 7-6 - Thames Basin Heaths SPA, illustrated trends in N deposition and acid deposition rates (ref. APIS, September 2026)



7.2.28 For the relevant features (bird species), APIS reports that for the modelled baseline background pollutant levels representing the year 2023, there is "*Potential negative impact on species due to impacts on the species' broad habitat*".

Mole Gap to Reigate Escarpment SAC

7.2.29 As set out on the APIS website and detailed in Appendix C, Mole Gap to Reigate Escarpment SAC include several features (both species and habitats) that are sensitive to levels of nitrogen and acidity, including species of bat *Myotis bechsteini* (Bechstein`s bat) and *Rhinolophus ferrumequinum* (Greater horseshoe bat) whose broad habitat are sensitive. *Triturus cristatus* (Great crested newt) is also noted with potential sensitivity.

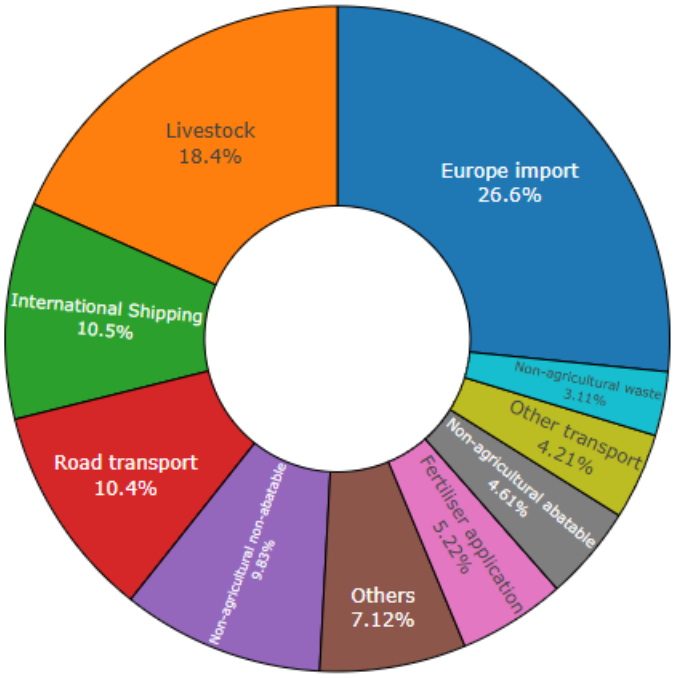
7.2.30 For qualifying habitats, with reference to APIS and details included in Appendix C, background annual mean NOx concentrations are below the Critical Level of 30µg/m^3 across this part of the SAC, ranging between 10.56 and 18.33 µg/m^3. Background annual mean NH_3 concentrations are around the Critical Level of 1µg/m^3 for lower plants, with a maximum of 1.17µg/m^3, but are below the Critical Level of 3µg/m^3 for higher plants. Background N deposition rates are estimated to be exceeding the lower Critical Load of 5kg N/ha/yr for broad habitats defined as 'dwarf shrub heath' and - in the case of Juniperus communis formations on heaths or calcareous grasslands – broadleaved mixed and yew woodland, with a maximum estimated for 2023 of 12.63kg N/ha/yr, and the lower Critical Load of 10kg N/ha/yr for other broadleaved mixed and yew woodland, coniferous wood and calcareous grassland habitats, with a maximum estimated for 2023 of 17.41kg N/ha/yr. Acid deposition rates do not exceed the Critical Loads ('min CL max N') for these habitats. The maximum background levels of all pollutants generally occur in the eastern parts of

the SAC near to, and south of, the M25 Junction 8 with the A217, with slightly lower levels to the west and around the A24 near Mickleham (south of Leatherhead).

7.2.31 Whilst providing useful baseline context, background concentrations are representative of concentrations that can be experienced away from a pollution source. With increasing distance towards a pollution source, such as a busy road, pollutant levels will increase so that at the roadside, levels could be substantially higher than the background. In-particular, NOx concentrations within 200m of the A27 near Mickleham, M25 mainline between junctions 8 and 9, and the A217 Reigate Hill could exceed the Critical Level. NH_3 concentrations are also likely to become elevated towards these roads.

7.2.32 At the SAC, road transport is estimated to account for 10.4% of total atmospheric nitrogen deposition (illustrated in Figure 7-7).

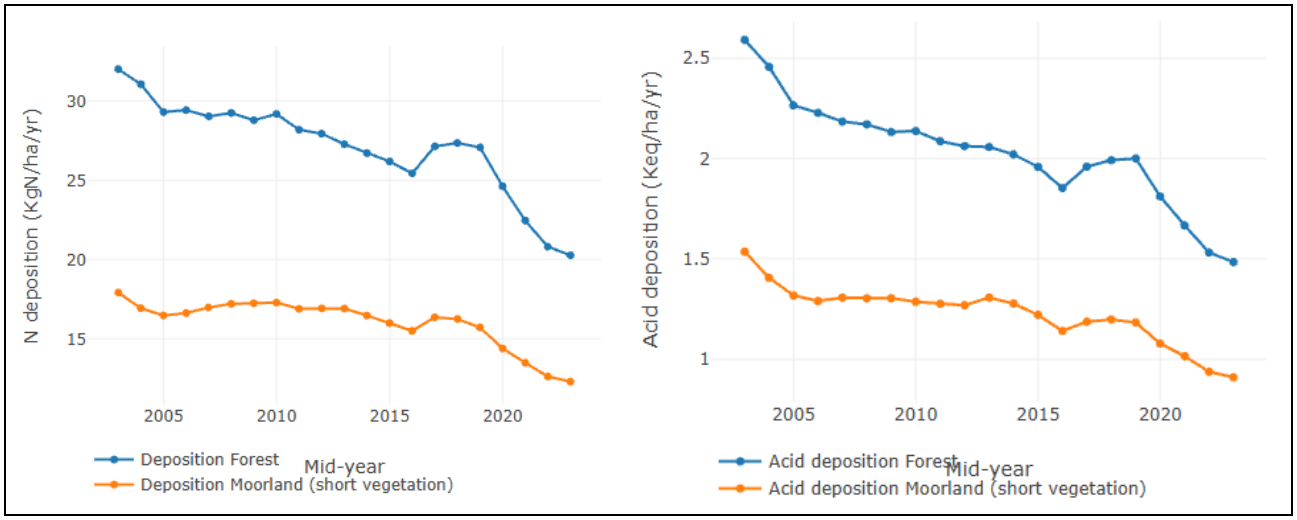
Figure 7-7 - Mole Gap to Reigate Escarpment SAC, sources ranked by total nitrogen deposition (kg N/ha/yr) from combined UK sources (ref. APIS, September 2026)



7.2.33 The historical trends in N deposition and acid deposition, based on modelling, are illustrated in Figure 7-8. The long-term trends are downwards, which aligns with actual reductions in NOx emissions over time, as reflected in Defra statistics[30].

7.2.34 Less clear is the long-term trend in NH_3, an important component of N deposition and acid deposition. According to Defra statistics[31], by far the greatest contributor is the agricultural sector, with road traffic making a relatively very minor and declining contribution.

Figure 7-8 – Mole Gap to Reigate Escarpment SAC, illustrated trends in N deposition and acid deposition rates (ref. APIS, September 2026)



7.2.35 For many of the relevant features of the SAC, there is potential that current levels of pollutants are having a negative impact.

PUBLIC ACCESS / DISTURBANCE

7.2.36 As part of the screening exercise, consideration has also been given to the sensitivities of the Habitats sites to public access and disturbance, with all Habitats sites with the exception of Richmond Park listing public access / disturbance as a pressure / threat. However, due to the close proximity of this site to RBKT, this site will still be considered at the screening stage.

7.2.37 Development in proximity to these sites can lead to an increase in visits to the sites, potentially resulting in damage to habitats via compaction / erosion, spread of invasive species and dog fouling amongst other recreational impacts.

7.2.38 The Habitats sites identified in this screening include those designated for habitats, specifically heathland, those designated for wetland bird species, and sites designated for invertebrate interest. The habitats or qualifying features of the Habitats sites are therefore vulnerable to additional pressures from public access or disturbance through different mechanisms.

7.2.39 The location of the identified Habitats sites in South East England places them in a location of acute pressure from high population density and predicted growth, with the corresponding identified trend to visit these sites more[32].

HYDROLOGICAL CHANGES

7.2.40 Development proposals associated with the Local Plan have the ability to impact water dependent Habitats sites via a range of mechanisms, including:

- An increase in water demand required to supply new homes and businesses;
- An increase in effluent discharge for treatment;
- Alterations in surface permeability and run-off rates; and
- Reduced quality of surface water run-off

Consideration has therefore been given to hydrological changes in relation to Thames Basins Heaths SPA as this has been identified as a threat to this Habitats site.

7.2.41 The site features for the remaining Habitats Sites are not considered to be 'water resource sensitive' with hydrological changes not listed as a pressure or threat for these sites and, as such, are not considered to be vulnerable to hydrological changes associated with the growth supported by the New Local Plan. Therefore, only Thames Basin Heaths will be considered further within this screening exercise with regards to hydrological changes.

URBANISATION

7.2.42 Impacts resulting from urbanisation typically occur when proposed developments arising from a New Local Plan are located in close proximity to Habitats sites. Urbanisation is a broad term which can be used to describe a number of factors affecting Habitats sites, including wildfire / arson, vandalism, cat predation and fly-tipping.

7.2.43 Development in proximity to these sites can lead to an increase in visits to the sites, with the result that additional pressures can arise including increased incidence of fire, disturbance to roosting, feeding and breeding birds, and increased predation rates in heathland environments[33].

7.2.44 Urbanisation mitigation strategies have been developed and implemented across the UK through the establishment of buffer zones. These are typically set as 400-500m

[32] Lake, S.; Liley, D.; Saunders, P. 2020 *Recreation use of the New Forest SAC/SPA/Ramsar: Impacts of recreation and potential mitigation approaches*. Unpublished report by Footprint Ecology
[33] Underhill-Day, 2005 *A literature review of urban effects on lowland heaths and their wildlife* English Nature Report 623

from the edge of a Habitats site, with this distance reflecting the likely distance in which people will access a site on foot, and also likely impacts from cat predation.

7.2.45 Both Richmond Park SAC and Wimbledon Common SAC are located within close proximity to the boundary of RBKT, with one site allocation (KNK27) located within 0.12km and 0.43km of these SACs respectively, and therefore consideration has been given to LSE arising from the effects of urbanisation at both Richmond Park SAC and Wimbledon Common SAC.

7.2.46 For all other Habitats Sites (South West London Waterbodies SPA and Ramsar site, Thames Basin Heaths SPA and Mole Gap to Reigate Escarpment SAC) they are considered a sufficient distance away from the proposed site allocations that they will not be considered further with regards to effects arising from urbanisation.

FUNCTIONALLY LINKED LAND

7.2.47 FLL refers to areas outside Habitats sites that are essential in supporting the ecological functions of species for which the sites were designated.

7.2.48 Whilst there are no Habitats sites located within RBKT itself, and therefore the direct loss of land within a designated site will not occur as a result of the Local Plan, there is the potential for the loss or disturbance of supporting habitat (FLL) if present, which can be located at a distance away from the Habitats site.

7.2.49 The loss of any such habitat would have the potential to impact the movement of qualifying features of the Habitats sites. All six Habitats Sites have mobile species that are listed as qualifying features and therefore consideration will be given to the potential impacts on FLL of all sites.

CONSULTATION WITH NATURAL ENGLAND

7.2.50 As part of the Sustainability Appraisal Draft Scoping Report for RBKT Local Plan, Natural England were consulted in October 2017. A response from Natural England received in October 2017 stated the following:

'Natural England does not consider that this Draft Scoping Report poses any likely risk or opportunity in relation to our statutory purpose, and so does not wish to comment on this consultation'.

7.2.51 Further, in April 2026, the Council met with Natural England through the Duty to Cooperate process and is committed to working with them throughout the process. The HRA will be published for consultation, with Natural England invited to review and comment on the draft document prior to the Local Plan being submitted

SUMMARY OF PRESSURES AND THREATS

7.2.52 The screening exercise has considered the high-level pressures and threats to each site associated with air quality related impacts, public access and disturbance, hydrological changes, urbanisation effects and potential impacts to FLL based on

published research and reports for individual sites and the effects of access generally on habitats and species. This is detailed within Table 7-2 below.

Table 7-2 - Discussion of Identified Pressures and Threats

Pressure/threat	Habitats sites concerned	Discussion
Air pollution: impact of atmospheric nitrogen deposition	Wimbledon Common SAC	All allocated sites, with the exception of SOB10, Silverglade Business Park, fall within 10km of the Habitats site. Notably, the closest site is KNK27, Kingston University, only 0.43km (as the crow flies) from Wimbledon Common SAC. The SIP states: *Nitrogen deposition exceeds site relevant critical loads. Wimbledon Common is subject to high levels of atmospheric nitrogen oxide and ammonia deposition which is likely to be having deleterious effects on sensitive habitats, particularly the heath and mire vegetation.* Baseline data from APIS confirms the potential for exceedances of both the relevant NH_3 Critical Level, and the Critical Loads for N deposition and acid deposition rates, in locations with Northern Atlantic wet heaths and European dry heaths. Although background NOx concentrations do not exceed the Critical Level, any areas of these habitats that are within 200m of the A3 or A219 could potentially be affected by elevated concentrations and nitrogen/acid deposition rates in the future if the Local Plan increases traffic on these routes.
	Richmond Park SAC	Although for this SAC *Air pollution: impact of atmospheric nitrogen deposition* has not been identified as a pressure or threat, due to the close proximity of this Habitats site to RBKT, applying the precautionary approach, further assessment at screening will be considered. All allocated sites, fall within 10km of the Habitats site. Notably, the closest site is KNK27, Kingston University, only 0.12km (as the crow flies) from Richmond Park SAC. As there are no identified pressures or threats for this site, the SIP simply states: *No current issues affecting the Natura 2000 feature(s) have been identified on this site.*
	Thames Basin Heaths SPA	Three allocated sites fall within 10km of the Habitats site: ■ SOB06, Chessington World of Adventure Resort (8.13km) ■ SOB09, Former Chessington Golf Course (9.79km) ■ SOB10 Silverglade Business Park (8.15km) The SIP states: *Nitrogen deposition exceeds the site-relevant critical load for ecosystem protection. The aerial pollution may be promoting changes in species composition of mires towards Molinia and sedge dominated systems rather than Sphagnum dominated; spread of*

Pressure/threat	Habitats sites concerned	Discussion
		Molinia into wet and dry heath also appears to be promoted by high nitrate levels. This is most likely to be a current issue at Chobham Common but may represent a chronic adverse impact over the complex as a whole. Baseline data from APIS confirms the potential for exceedances of the NH_3 Critical Level, and the Critical Loads for nitrogen deposition and acid deposition in locations with supporting habitat for the qualifying bird specie. Although background NOx concentrations do not exceed the Critical Level, any areas of these habitats that are within 200m of the A3 or M25 could potentially be affected by elevated concentrations and nitrogen/acid deposition rates in the future if the Local Plan increases traffic on these routes.
	Mole to Reigate Escarpment SAC	Five allocated sites fall within 10km of the Habitats site: ■ SOB04 St Mary's Hall ■ SOB06 Chessington World of Adventure Resort (7.19km) ■ SOB07 Green Lane Farm Kennels (8.94km) ■ SOB09 Former Chessington Golf Course (8.53km) ■ SOB10 Silverglade Business Park (6.67km) The SIP states: *Nitrogen deposition exceeds the site-relevant critical load for ecosystem protection and hence there is a risk of harmful effects, but the sensitive features are currently considered to be in favourable condition on the site. This requires further investigation.* Baseline data from APIS confirms the potential for exceedances of the NH_3 Critical Level, and the Critical Loads for nitrogen deposition and acid deposition in locations with the relevant features: Asperulo-Fagetum (beech forests), European dry heaths (dry heaths), Juniperus communis formations on heaths or calcareous grasslands, semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia), stable xerothermo-philous formations with Buxus sempervirens on rock slopes (Berberidion pp), Taxus baccata woods of the British Isles, and supporting habitats forBechstein`s bat and greater horseshoe bat. Although background NOx concentrations do not exceed the Critical Level, any areas of these habitats that are within 200m of the A24, B2209, B2033, B2032, M25 or A217 could potentially be affected by elevated concentrations and nitrogen/acid deposition rates in the future if the Local Plan increases traffic on these routes.
Public access/ disturbance	Wimbledon Common SAC	All allocated sites, with the exception of SOB10, Silverglade Business Park, fall within 10km of the Habitats site. Notably, the closest site is KNK27, Kingston University, only 0.43km (as the crow flies) from Wimbledon Common SAC. Public access and disturbance are listed as a pressure on the designated site. The SIP states: *'High visitor use of the site causes damage to sensitive habitats, and results in adverse impacts such as compaction around the base of mature trees and removal of fallen timber'.*

Pressure/threat	Habitats sites concerned	Discussion
		The proposed measures in the SIP to address this are: - *'Review the management plan to ensure that visitor pressure is addressed'; and* - *'Implement measures to reduce impacts arising from public access and use of the site'.*
	Richmond Park SAC	Although for this SAC *'Recreational access / disturbance* has not been identified as a pressure or threat, due to the close proximity of this Habitats site to RBKT, applying the precautionary approach, further assessment at screening will be considered. All allocated sites, fall within 10km of the Habitats site. Notably, the closest site is KNK27, Kingston University, only 0.12km (as the crow flies) from Richmond Park SAC.
	South West London Waterbodies SPA and Ramsar site	All allocated sites fall within 10km of the SPA. The closest allocated site is KNK18 The Malthouse and River Reach which falls within 5.31km of this Habitats site. Public access and disturbance are listed as both pressures and threats on the designated site and specifically the features of gadwall and shoveler. The SIP identifies that public access for recreation, including water-based activities on some waterbodies (the designated site is composed of a number of reservoirs, lakes and bodies of water) may disturb these species and/or reduce the habitat available to them. Measures to manage the recreational pressure on these sites, which are likely to be highly attractive to additional nearby residents, have been put forwards including creating alternative recreation opportunities, but such measures will need to be able to effectively address the scale and pace of additional development in close proximity to the designated site waterbodies to avoid adverse effects.
	Thames Basin Heaths SPA	Three allocated sites fall within 10km of the Habitats site: ■ SOB06, Chessington World of Adventure Resort (8.13km) ■ SOB09, Former Chessington Golf Course (9.79km) ■ SOB10 Silverglade Business Park (8.15km) Public access and disturbance are listed as a pressure and threat on the designated site. The SIP states: *Parts of Thames Basin Heaths (and Thursley, Hankley & Frensham Commons SPA) are subject to high levels of recreational use and dog walkers make up a large proportion of visitors. This is likely to be affecting the distribution and overall numbers of ground-nesting Annex 1 birds (and breeding success). An 'avoidance strategy' is in place to help manage this pressure, including the provision of Suitable Accessible Natural Green Space (SANGS). However, recreational pressure may be hampering the potential for the sites to achieve their full contribution to sustainable national populations. Further work is desirable to determine the scale of impact from recreational disturbance. There is also concern at the growing use of parts of the complex by commercial dog walkers and desire to control*

Pressure/threat	Habitats sites concerned	Discussion
		this. Improved habitat management to increase suitability for Annex 1 birds and better coordination of habitat provision across the complex is also needed to better offset the effects of disturbance.
	Mole to Reigate Escarpment SAC	Five allocated sites fall within 10km of the Habitats site: ■ SOB04 St Mary's Hall (9.31km) ■ SOB06 Chessington World of Adventure Resort (7.19km) ■ SOB07 Green Lane Farm Kennels (8.94km) ■ SOB09 Former Chessington Golf Course (8.53km) ■ SOB10 Silverglade Business Park (6.67km) Public access and disturbance are listed as a threat for this Habitats site, with the SIP stating: *Increasing pressure by increased numbers of visitors on protected sites and disturbance on the species which live here can become damaging. Trampling of orchid-rich grasslands, repetitive disturbance to Great crested newt breeding ponds, and spread of disease (such as box blight) are examples.*
Hydrological changes	Thames Basin Heaths SPA	Hydrological changes are identified as a threat for this site on the H4010 Wet heathland with cross-leaved heath and H7150 Depressions on peat substrates features. The SIP states: *Part of Thursley, Ash Pirbright & Chobham SAC (Elstead Common) has evidence of damaging impacts due to drainage. Drains are also present on Thursley and Ockley Commons but it is not clear whether these are having adverse impacts -more research is needed here. This is becoming more urgent in the face of changing weather patterns and prolonged droughts but it is not clear at present what intervention, if any, should be put in place.*
Urbanisation	Wimbledon Common SAC	Although for this SAC 'Urbanisation' has not been identified as a pressure or threat, due to the close proximity of this Habitats site to RBKT, applying the precautionary approach, further assessment at screening will be considered. When taking into account a 500m buffer zone for the effects of urbanisation, there is one allocated site, KNK27, which is located within 0.43km of the edge of the SAC. All other site allocations are at a greater distance than 500m and therefore will not be considered further with regards to LSE arising from the effects of urbanisation on this SAC.
	Richmond Park SAC	As above; although for this SAC 'Urbanisation' has not been identified as a pressure or threat, due to the close proximity of this Habitats site to RBKT, applying the precautionary approach, further assessment at screening will be considered. When taking into account a 500m buffer zone for the effects of urbanisation, there is one allocated site, KNK27, which is located within 0.12km of the edge of the SAC. All other site allocations are at a greater distance than 500m and therefore will not be considered

Pressure/threat	Habitats sites concerned	Discussion
		further with regards to LSE arising from the effects of urbanisation on this SAC.
Functionally Linked Land	Wimbledon Common SAC	Wimbledon Common SAC is primarily designated for its population of stag beetle, a species which is reliant on the availability of dead or rotting wood habitat. Whilst female stag beetle rarely fly and are more of a ground dwelling species, male stag beetle can typically travel up to 2km during their breeding season (a period of approximately six weeks during the summer months). Therefore there is potential for allocations within this distance to support stag beetle associated with the SAC should they contain suitable habitat.
	Richmond Park SAC	Richmond Park SAC is designated for its population of stag beetle, a species which is reliant on the availability of dead or rotting wood habitat. Whilst female stag beetle rarely fly and are more of a ground dwelling species, male stag beetle can typically travel up to 2km during their breeding season (a period of approximately 6 weeks during the summer months). Therefore there is potential for allocations within this distance to support stag beetle associated with the SAC should they contain suitable habitat.
	South West London Waterbodies SPA and Ramsar site	The SPA and Ramsar site are designated for their wintering populations of Shoveler and Gadwall. These species rely on the waterbody habitat that comprises these Habitats sites. Therefore there is potential for allocations within RBKT to support bird species associated with the SPA and Ramsar site should they contain suitable habitat.
	Thames Basin Heaths SPA	This SPA is designated for its populations of nightjar, woodlark and Dartford warbler. All three of these species rely on the heathland habitat that is present. Therefore there is potential for allocations within RBKT to support bird species associated with the SPA should they contain suitable habitat.
	Mole Gap to Reigate Escarpment SAC	Two species, great crested new and Bechstein's bat are present as a qualifying feature of this SAC, but not the primary reason for site selection. Whilst great crested newt are a mobile species, they do not typically move further than a range of 500m. Given the closest site allocation (SOB10) is over 6km away from this SAC, this species will not be discussed further within this report.

Pressure/threat	Habitats sites concerned	Discussion
		Bechstein's rely on woodland habitat as they are a predominately tree roosting species. Therefore there is potential for allocations within RBKT to support Bechstein's bats associated with the SAC should they contain suitable habitat.

7.2.53 Table 7-3 sets out the findings of the Stage 1 screening exercise and identifies where the potential for LSE arises from the strategic and development management policies set out within the Local Plan.

7.2.54 It should be noted that most policies cannot usually result in impacts as they comprise general design or guidance criteria or are general statements of policy / aspiration for RBKT which cannot lead to or trigger development or environmental protection. Instead, they are policies that make provision for change but which couldn't have a conceivable effect in and of themselves.

Policies that relate to the overall quantum of development, or specific locations, or contain mitigating elements that might be relied on to ensure adverse effects do not occur will be screened into the assessment.

Table 7-3 - Screening

Policy	Heading	Summary of Policy	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
Sustainable Development					
K1	*Achieving Sustainable Development*	Policy K1 ensures the principle of sustainable development is followed for all development. This includes environmental, social and economic sustainability.	This is a positive policy that seeks to promote sustainable development. It is compatible with the aims of conserving the integrity of Habitats sites by helping to ensure the delivery of sustainable development and does not identify any specific location or quantum of development. There are no effects pathways present.	No LSE therefore no in-combination effect.	Screened out
K2	*Locations for Sustainable Development*	Policy K2 aims to meet the development potential of the Kingston Town Centre by supporting employment opportunities and housing choice for the local community, allocating key sites for a mix of residential and community facilities, supporting new and improved social infrastructure, and promoting active transport.	This is a policy which includes development allocations including those which relate to new residential sites, which could lead to an increase overall in residents and associated potential impacts, including increased traffic. Although this policy is considered to overlap with those considered under Policy KH1, following a precautionary approach, this policy has also been screened in.	Any increase in traffic due to development has the potential to give rise to 'in-combination' effects with other plans and projects. Visitor pressure may be further increased as a result of additional residents and journeys delivered under Local Plan policies and development schemes	Screened in
K3	*Key Areas of Change*	Policy K3 directs development to key areas of change within the Borough: Kingston Town Centre area (includes Norbiton), Kingston Road (between Kingston and New Malden), New Malden Town Centre area and Tolworth Town Centre. Improvements to these key areas will provide a boost to local economy, diversify uses and recognise its heritage assets and riverside location for future development.	This is a policy which directs development towards certain areas within the Borough to provide benefits to the local economy, recognises heritage assets and seeks to place future development at strategic locations. Although this policy does not identify any specific location or quantum of development, it does identify four key areas across the Borough for potential growth and therefore, following a precautionary approach, this policy has also been screened in.	Any increase in traffic due to development has the potential to give rise to 'in-combination' effects with other plans and projects. Visitor pressure may be further increased as a result of additional residents and journeys delivered under Local Plan policies and development schemes	Screened in
Climate Change and Environmental Sustainability					
KC1	*Climate Change and Environmental Sustainability *Strategic Policy**	This strategic policy ensures that development in the Borough is environmentally sustainable and resilient to climate change. To aid this, the Council will promote low and net zero carbon development in line with the London Plan and ensure that new development is designed in a way that mitigates heat risk effectively. This policy also helps to tackle both air quality issues within the Borough, and	A positive guidance policy addressing the climate emergency by reducing carbon dioxide emissions and supporting the transition to a low and net zero carbon future and requiring new development to be at least 'air quality neutral' or 'air quality positive'. Likely to be of benefit to the Habitats sites if this includes the provision of more sustainable transport methods by reducing the need for private car use.	No LSE therefore no in-combination effect.	Screened out

Policy	Heading	Summary of Policy	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
		areas vulnerable to flood risk. Poor air quality is a key issue in the Borough, with the whole of RBKT being declared an Air Quality Management Area (AQMA) for exceedances in annual and 24-hour mean particulate matter (PM_{10}), and annual mean nitrogen dioxide (NO_2) levels. Policy KC1 requires new development to be at least 'air quality neutral' or 'air quality positive' for major schemes, as well as enabling residents to reduce the need for private car use.			
KC2	*Air Quality*	Policy KC2 ensures that all major and large-scale developments should take an 'Air Quality Positive' approach, with all development meeting or exceeding the 'Air Quality Neutral Standard' and accord with the RBKT's Air Quality Action Plan.	This is a positive guidance policy that is to drive significantly improved environmental conditions with regards to air quality in the RBKT area.	No LSE therefore no in-combination effect.	Screened out
KC3	*Flood Risk*	Policy KC3 and KC4 will help to reduce flood risk and impacts of flooding within RBKT by requiring all developments to avoid or minimise contributions to all sources of flooding including fluvial, groundwater, surface water, tidal or flooding from sewers, taking into account future climate change modelling.	This is a positive guidance policy that seeks to protect development from flood risk.	No LSE therefore no in-combination effect.	Screened out
KC4	*Sustainable Drainage*	As above.	This is a positive guidace policy that seeks to protect development from flood risk.	No LSE therefore no in-combination effect.	Screened out
KC5	*Wastewater management*	Policy KC5 sets out that developments are required to protect and, where possible, increase the capacity of existing water spaces, as well as reducing water consumption with new residential developments achieving a maximum water use of 105 litres per person per day.	This is a positive guidance policy that seeks to protect development from flood risk and reduce water usage in the Borough.	No LSE therefore no in-combination effect.	Screened out
KC6	*Managing Heat Risk*	Policy KC6 requires new development to ensure buildings and spaces around them are designed to avoid overheating and excessive heat generation, consequently minimising impact and contribution to the urban heat island effect. To aid this, green infrastructure will be incorporated, including the use of	This is a positive guidance policy by helping to reduce the urban heat island effect, therefore helping to address the climate emergency.	No LSE therefore no in-combination effect.	Screened out

Policy	Heading	Summary of Policy	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
		trees to provide shade in the public realm.			
KC7	*Minimising Greenhouse Emissions*	Policy KC7 requires all proposed development to demonstrate that the fullest contribution to minimising greenhouse gas (GHG) emissions has been made on site. All major development will also be required to calculate whole life-cycle carbon emissions in accordance with London Plan requirements through a nationally recognised Whole Life-Cycle Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions.	This a positive policy guidance which will help to reduce greenhouse gas emissions therefore making positive steps to improve the environmental conditions within the Borough.	No LSE therefore no in-combination effect.	Screened out
KC8	*Energy Infrastructure*	Policy KC8 will help to reduce energy demand by requiring development to provide an Energy Strategy demonstrating how emissions savings have been maximised, and the aim for future development to be compatible with a decentralised energy network in accordance with any relevant energy masterplan and the District Heating Manual for London.	This is a positive guidance policy that will help to reduce energy demand from development.	No LSE therefore no in-combination effect.	Screened out
KC9	*Ground Contamination and Hazardous Substances*	Policy KC9 requires all proposals with a risk of developing on contaminated lan to identify all potential risks to receptors through a preliminary risk assessment and, where necessary, an intrusive site investigation and quantitative risk assessment.	This is a positive guidance policy that will help to protect waterbodies within the Borough from contamination.	No LSE therefore no in-combination effect.	Screened out
KC10	*Sustainable Construction and Supporting the Circular Economy*	Policy KC10 requires all development to adopt a circular economy approach to building design and construction to reduce waste and use materials and products for as long as possible.	This is a positive guidance policy that will help to minimise embodied carbon and waste from development, does not identify any specific location or quantum of development	No LSE therefore no in-combination effect.	Screened out
KC11	*Waste and Recycling Management*	Policy KC11 requires all new development to include sufficient accessible space for waste management (recyclables, biodegradable and residual waste) in line with the South London Waste Plan.	This is a positive guidance policy as it aims to make recycling as easy as possible therefore resulting in higher recycling rates within the Borough.	No LSE therefore no in-combination effect.	Screened out
Design and Heritage					

Policy	Heading	Summary of Policy	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
KD1	*A Place-Led Approach to Design*	Policy KD1 requires developments to demonstrate a high-quality, landscape and place-led design that contributes positively to creating attractive, sustainable and distinctive places.	This is a positive guidance policy that seeks to demonstrate high-quality design for new development, does not identify any specific location or quantum of development. There are no effects pathways present.	No LSE therefore no in-combination effect.	Screened out
KD2	*Local Context and Character*	Policy KD2 aims to achieve the highest standard of design for all sites and developments across RBKT to ensure its distinctive heritage and local identity is maintained. Developments will need to respect and enhance visual, historical, environmental, social and functional qualities of buildings, spaces and places that positively contribute to local character and sense of place.	A development management guidance policy relating to conserving Heritage assets. There are no effects pathways present.	No LSE therefore no in-combination effect.	Screened out
KD3	*Public Realm, Landscape and Amenity*	Policy KD3 requires the amenity and public realm spaces to be designed and maintained to a high-quality standard. It should deliver inclusive, safe, accessible, attractive and well-connected places, that incorporate heritage, cultural and active travel where possible.	This is a positive guidance policy that seeks to promote the use of amenity and public realm spaces within the Borough, therefore potentially diverting pressure away from the Habitats Sites	No LSE therefore no in-combination effect.	Screened out
KD4	*Housing Quality and Amenity Space Standards*	Policy KD4 requires all residential developments to provide a high standard of internal and external amenity for occupants. Developments must also show high-quality design that creates healthy, comfortable and functional living environments. This includes proposals for new-builds, changes of use, alterations and extensions	This is a positive guidance policy that seeks to promote the use of amenity and public realm spaces within the Borough, therefore potentially diverting pressure away from the Habitats Sites. Additionally, this is a development management policy relating to housing quality and does not identify any specific location or quantum of development This policy provides positive provision and is a key aspect of sustainable development. There are no effects pathways present.	No LSE therefore no in-combination effect.	Screened out
KD5	*Inclusive and Safe Environment*	Policy KD5 sets out that all new housing development should provide inclusive design to create environments that are safe, accessible, welcoming and can be used with dignity and ease by everyone.	This is a development management policy relating to housing quality, it does not identify any specific location or quantum of development This policy provides positive provision. There are no effects pathways present.	No LSE therefore no in-combination effect.	Screened out

Policy	Heading	Summary of Policy	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
KD6	*Circular Economy and Adaptable Design*	Policy KD6 states that developments must follow the circular economy hierarchy by prioritising retaining or sustainable retrofitting over demolition. Where this is not possible, new construction must have longevity and adaptability and original building materials reused.	This is a development management policy relating to housing quality, it does not identify any specific location or quantum of development This policy provides positive provision and is a key aspect of sustainable development. There are no effects pathways present.	No LSE therefore no in-combination effect.	Screened out
KD7	*Residential Alterations, Extensions and Basements*	Policy KD7 requires proposals to alter or extend existing residential buildings (including basements), to be of a high standard and adaptable in design to help meet the diverse and changing needs of the RBKT's residents, whilst being sensitive to the surrounding area and its character. Housing developments need to be inclusive and accessible for all, safe, and meet and wherever possible exceed, the housing standards set out in the London Plan.	This policy is in relation to extensions to existing residential developments rather than new developments. As such it is unlikely to result in increased recreational pressure on Habitats sites. As such, no effect pathways are present.	No LSE therefore no in-combination effect.	Screened out
KD8	*Small Sites Development (Infill, Backland and Garden Land)*	Policy KD8 supports the development of small sites where they make a positive contribution to housing supply and local character.	This policy provides the principles for the development of small spaces within the Borough. It is a general policy that looks to support small sites but does not define or direct development. As such, no effect pathways present.	No LSE therefore no in-combination effect.	Screened out
KD9	*Tall and Taller Buildings*	Policy KD9 requires proposals for new tall buildings (more than 21m) to demonstrate how they meet the requirements of London Plan Policy D9 (Tall Buildings), including the need to protect strategic and local views and landmarks and mitigate any safety risks such as fire and suicide.	This is a development management policy relating to tall buildings which protects local views and landmarks, does not identify any specific location or quantum of development No effect pathways are identified as present.	No LSE therefore no in-combination effect.	Screened out
KD10	*Commercial Frontages, Advertisements and Digital Infrastructure*	Policy KD10 requires shopfronts to be active, creating an interest and liveliness to the high streets.	This guidance policy provides the principles for the aesthetics associated with retail development within town centres. No effect pathways present	No LSE therefore no in-combination effect.	Screened out
KD11	*Historic Environment*	Policy KD11 supports development that conserves RBKT's historic environment and heritage assets.	A development management policy relating to conserving the historic environment. There are no effects pathways present.	No LSE therefore no in-combination effect.	Screened out

Policy	Heading	Summary of Policy	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
KD12	*Heritage Assets*	Policy KD12 sets out that Developments should respect the distinctive features of the heritage assets and their setting for the implementation of an integrative placemaking approach.	A development management policy relating to conserving Heritage assets. There are no effects pathways present.	No LSE therefore no in-combination effect.	Screened out
KD13	*Archaeology*	Policy KD13 sets out that in accordance with relevant national policy and London Plan policy, the Council will protect the Borough's archaeological assets by requiring development that includes excavation or ground works in the Borough's Archaeological Priority Areas to demonstrate that archaeological potential has been fully evaluated.	A development management policy relating to conserving archaeological assets. There are no effects pathways present.	No LSE therefore no in-combination effect.	Screened out
KD14	*Local Views*	Policy KD14 requires development proposals to positively contribute to the characteristics and composition of strategic and local views.	This policy is in relation to protecting designated views, in particular those focussed around RBKT Town Centre and therefore away from the Habitats Sites. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out
Housing Delivery					
KH1	*Housing Requirement*	Strategic Policy KH1 aims to meet the London Plan's housing target for the Borough by providing 17,100 new homes between 2028/29 and 2043. These homes will include a mix of affordable homes, and homes to meet the Borough's housing needs, such as retirement and custom homes. Policy KH1 also outlines that proposed housing developments should be located in areas well served by public transport, community facilities and amenities, and within 800m of town centres and railway stations.	This policy provides the development principles to meet the National Housing Allocation objectives. The quantum of development across the Borough, where known, is set out in the Allocated sites identified, the closest of which is 0.43km from the nearest screened in Habitats site (Figure 5-1). Any development within RBKT's administrative area has the potential for increased traffic (and therefore impacts on air quality), increased recreational and development pressures and therefore disturbance on nearby Habitats sites. This policy could result in development in proximity to Habitats sites which could lead to LSE. The objectives of Policy KC1 regarding air quality neutrality and improvement as part of the AQMA are noted, however, the objectives of that policy are targeted at human health receptors and associated pollutants, as well as being an objective for major sites. Applying the precautionary principle, it is not therefore possible to rely on that forthcoming policy to conclude no LSE on Habitats sites from air quality	Any increase in traffic due to development has the potential to give rise to 'in-combination' effects with other plans and projects. Visitor pressure may be further increased as a result of additional residents and journeys delivered under Local Plan policies and development schemes	Screened in

Policy	Heading	Summary of Policy	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
			effects, as the contribution of minor developments and specific pollutants cannot be assessed in sufficient detail at this stage.		
KH2	*Affordable Housing*	Policy KH2 supports the delivery of new affordable housing which will be a tenure split of 50% on public sector owned land and 35% on privately owned land, 70% of these being low cost rented homes and with enough bedrooms to support families.	This is a development management policy and a framework to guide the affordable housing requirement in RBKT, it does not identify any specific location or quantum of development. There are no effect pathways present.	No LSE therefore no in-combination effect.	Screened out
KH3	*Housing Size Mix*	Policies KH3 to KH8 ensure that the type and size of housing delivered will reflect the varying local needs of the residents in RBKT. The provision of an appropriate mix of different sized homes, specialist and supported living, build to rent, and the protection of gypsy and traveller sites will help to reduce inequalities with access to housing, particularly for those in the community that are most vulnerable.	This is a development management policy and a framework to guide the housing size mix requirement in RBKT, it does not identify any specific location or quantum of development. There are no effect pathways present.	No LSE therefore no in-combination effect.	Screened out
KH4	*Specialist and Supported Housing*	As above.	This is a development management policy to guide RBKT when providing for specialist and supported living housing, it does not identify any specific location or quantum of development. There are no effect pathways present.	No LSE therefore no in-combination effect.	Screened out
KH5	*Purpose-Built Student Accommodation*	As above.	This is a development management policy to guide RBKT on the student accommodation needs within the Borough, it does not identify any specific location or quantum of development There are no effect pathways present.	No LSE therefore no in-combination effect.	Screened out
KH6	*Houses in Multiple Occupations*	As above.	This is a development management policy to guide RBKT on the houses with multiple occupations needs within the Borough, it does not identify any specific location or quantum of development. There are no effect pathways present.	No LSE therefore no in-combination effect.	Screened out
KH7	*Other Housing Models*	As above.	This is a development management policy to guide RBKT on various housing model needs within the Borough, it does not identify any specific location or quantum	No LSE therefore no in-combination effect.	Screened out

Policy	Heading	Summary of Policy	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
			of development There are no effect pathways present.		
KH8	*Gypsies and Travellers*	As above.	This is a development management policy to guide RBKT when providing for Gypsy and Traveller needs, it does not identify any specific location or quantum of development There are no effect pathways present.	No LSE therefore no in-combination effect.	Screened out
Economy and Town Centres					
KE1	*Supporting the Borough's economy and town centres *Strategic Policy**	Strategic policy KE1 aims to create a strong and competitive sustainable economy within RBKT. This includes supporting developments that give opportunities for workspaces and employment across the Borough, as well as in designated employment and town centre locations. Policy KE1 also supports the growth of the tourism sector, encouraging visitors and further economic diversity within the Borough.	This is a broad policy that relates to RBKT's economy. Whilst it is noted that economic growth has potential to impact upon Habitats sites (atmospheric pollution and water resource conflicts), this policy does not explicitly provide for development but provides planning guidance for decision making.	No LSE therefore no in-combination effect.	Screened out
KE2	*Protecting employment uses*	Policy KE2 provides opportunities for the diversification and development of the economy within the Borough. It details the development of both industrial space and workspace within the Borough, providing opportunities for investment into the Borough, as well as employment opportunities within these businesses.	This is a broad policy that relates to RBKT's economy. Whilst it is noted that economic growth has potential to impact upon Habitats sites (atmospheric pollution and water resource conflicts), this policy does not explicitly provide for development but provides planning guidance for decision making.	No LSE therefore no in-combination effect.	Screened out
KE3	*Affordable workspace*	Policy KE3 relates to the provision of affordable workspaces which will allow the creation of new businesses that can contribute towards the local economy. It will also allow for the diversification of different businesses.	This is a development management policy to guide RBKT with regards to affordable workspace. There are no effect pathways present.	No LSE therefore no in-combination effect.	Screened out
KE4	*Securing employment and training opportunities*	Policy KE4 encourages developments to improve access to employment and training opportunities for local people, closer to where they live.	This is a development management policy that seeks to provide employment locally. As such, there are no effect pathways present. This could be a positive policy as it may make public transport more accessible for the purposes of commuting to work and thus reducing the reliance on personal vehicles and therefore reducing potential air quality impacts.	No LSE therefore no in-combination effect.	Screened out

Policy	Heading	Summary of Policy	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
KE5	*Development in industrial locations*	Policy KE5 aims for designated industrial locations to make a positive contribution in accordance with their position in the industrial locations hierarchy.	This policy provides the principal for development within industrial locations. It does not identify any specific location or quantum of development. It can be considered that at the Local Plan level there are no effect pathways present	No LSE therefore no in-combination effect.	Screened out
KE6	*Locally Significant Industrial Sites*	Policy KE6 protects all Locally Significant Industrial Sites for industrial-type uses.	This policy aims to ensure that key industrial sites across the Borough are kept for that use. There are no effect pathways present.	No LSE therefore no in-combination effect.	Screened out
KE7	*Development in Town Centres*	Policy KE5 supports development within the Borough's town centres for various uses, including retail and leisure. Policy KE5 also includes the utilisation of empty units within proposed developments, the development of open spaces within the town centre and also supports new and existing street markets within the area.	This policy provides the principles for development within town centres. It does not identify any specific location or quantum of development. It can be considered that at the Local Plan level there are no effect pathways present	No LSE therefore no in-combination effect.	Screened out
KE8	*Visitor Accommodation*	Policy KE8 supports the development of visitor accommodation within town centres where there is a requirement.	This policy provides the principles for development for visitor accommodation e.g. hotels within town centre locations, it does not identify any specific location or quantum of development No effect pathways present.	No LSE therefore no in-combination effect.	Screened out
KE9	*Hot Food Takeaways*	Policy KE9 prevents the over proliferation of takeaways within the Borough.	This is a guidance policy to prevent too many hot food takeaway outlets within the Borough. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out
KE10	*Betting Shops*	Policy KE10 prevents the over proliferation of betting offices within the Borough.	This is a guidance policy to prevent too many betting offices within the Borough. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out
Social Infrastructure					
KS1	*Social Infrastructure *Strategic Policy**	Strategic policy KS1 includes measures to preserve existing social infrastructure provision within the Borough, as well as requiring proposed developments to contribute towards the provision of social infrastructure.	This policy provides the principles for social infrastructure within the Borough and primarily relates to already built-up town centres. It does not identify any specific location or quantum of development. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out
KS2	*Healthcare and social care facilities*	Policy KS2 details the requirements for adequate, inclusive healthcare facilities.	A development management policy in relation to the availability of healthcare	No LSE therefore no in-combination effect.	Screened out

Policy	Heading	Summary of Policy	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
			facilities within the Borough. No effect pathways present.		
KS3	*School, College and University Facilities*	Policy KS3 ensures the expansion of existing education sites and also requires the inclusion of adequate education provision within new proposed developments. This policy also includes measures that all school buildings contribute to being net zero carbon by 2030. The council will work in partnership with Kingston University and Kingston College identifying appropriate opportunities, including on their existing sites to meet the needs for new / upgraded facilities.	Given the close proximity of Kingston University to Wimbledon Common SAC, this policy has the potential to increase recreational pressure on the SAC if any new accommodation development on the site increases capacity. Further, it may also lead to an increase in traffic and therefore impacts on air quality.	Any increase in traffic due to development has the potential to give rise to 'in-combination' effects with other plans and projects. Visitor pressure may be further increased as a result of additional students that may occur as a result of new facilities.	Screened in.
KS4	*Community Facilities*	Policy KS4 ensures adequate community facilities for new developments. These facilities should also be of a high-quality standard, which, when developed, will improve the diversity of the townscape and improve the public realm.	A development management policy in relation to the availability of community facilities within the Borough. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out
KS5	*Arts and Cultural Facilities*	Policy KS5 provides cultural and arts facilities inclusive to all communities.	A development management policy in relation to the availability of arts and cultural facilities within the Borough., which cannot lead to or trigger development. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out
KS6	*Sports and recreational facilities*	Policy KS6 contributes to the local economy through the development of new sports facilities.	A development management policy in relation to the availability of sports facilities within the Borough. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out
KS7	*Play and Informal Recreation*	Policy KS7 requires improving and protection of play and recreation areas within the Borough. Protecting and enhancing these areas contributes to improving the public realm, as well as preserving the local landscape.	Whilst this guidance policy seeks to increase opportunities for play and informal recreation, it is considered to be targeted towards facilities within the community and therefore unlikely to increase in recreational pressures on nearby Habitats Sites, particularly as these all fall outside of the Borough. Therefore no effect pathways are present.	No LSE therefore no in-combination effect.	Screened out
KS8	*Public Houses*	Policy KS8 protects public houses and provides opportunities for socialisation within the night-time economy.	A guidance policy in relation to existing public houses, which cannot lead to or trigger development. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out

Policy	Heading	Summary of Policy	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
Green and Blue Infrastructure					
KN1	*Green Infrastructure *Strategic Policy**	Strategic Policy KN1 protects and enhances green infrastructure within the Borough such as open spaces, habitats and rivers. The improvements of green infrastructure and inclusion within proposed developments will improve connectivity of habitats and increase habitats and ecological value throughout the Borough.	A positive policy providing for the protection and creation of Local Green infrastructure. This policy has the potential to divert recreational pressure away from sensitive Habitats sites.	No LSE therefore no in-combination effect.	Screened out
KN2	*Open Spaces*	Policy KN2 outlines the requirements for proposed developments to improve access and provide adequate provision of parks and open spaces within the local area.	This policy promotes the use and access to open spaces within the Borough which could therefore lead to increased recreational and pressures and therefore disturbance on nearby Habitats sites. The policy approach to look at this strategically could have potential to be beneficial as access can be managed, monitored and mitigated as necessary, depending on how the policy is implemented. This policy could result in LSE on nearby Habitats sites.	By improving access to open spaces, it has the potential to give rise to 'in-combination' effects with other plans and projects.	Screened in
KN3	*Biodiversity*	Policy KN3 ensures the conservation and enhancement of biodiversity within the Borough, including protecting species and sites and ensuring a minimum of 30% biodiversity net gain within new proposed developments.	This is a positive guidance policy that seeks to protect nature conservation sites including Habitats sites and embeds Biodiversity Net Gain within Planning Policy. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out
KN4	*Urban Greening and Trees*	Policy KN4 ensures the inclusion of urban greening measures within new developments, and the preservation of existing trees where possible.	A positive guidance policy that seeks to retain trees as part of development and the inclusion of urban greening measures, which cannot lead to or trigger development. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out
KN5	*Food Growing*	Policy KN5 focuses on the utilisation of land for urban agriculture. This provides communities with the opportunity to grow their own produce through community gardening spaces, improving food quality as well as community facilities and access to community gardens.	A general policy which does not identify any specific location or quantum of development and seeks to utilise agricultural land within the Borough for food growing and not directing development. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out
KN6	*Green Belt and Metropolitan Open Land*	Policy KN6 results in significant positive effects on IIA7 (efficient use of land) as it aims to preserve and enhance Green Belt and Metropolitan Open Land. This ensures that, where possible, green belt	A general policy which does not identify any specific location or quantum of development and seeks to protect	No LSE therefore no in-combination effect.	Screened out

Policy	Heading	Summary of Policy	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
		land remains undeveloped in favour of brownfield sites.	greenbelt land. No effect pathways present.		
KN7	*Rivers and River Corridors*	Policy KN7 aims to protect and enhance the biodiversity of the borough's blue infrastructure, including the River Thames, Hogsmill river and Beverly Brook. Development proposals must consider the watercourse where alongside or adjacent to a river corridor.	A positive guidance policy that seeks to protect the blue infrastructure, which cannot lead to or trigger development. This policy has the potential to help reduce any hydrological impacts as a result of development.	No LSE therefore no in-combination effect.	Screened out
KN8	*Moorings and Floating Structures*	Policy KN8 details where river-related development which enhances the river infrastructure will be permitted.	A development management policy in relation to the location of river related development. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out
Transport					
KT1	*Strategic Approach to Transport *Strategic Policy**	Strategic policy KT1 ensures the inclusion of sustainable transport modes, including active travel, within proposed developments. Policy KT1 also aims to make efficient use of land within transport developments, ensuring proposed developments are well located and connected to the wider Borough.	This is a positive policy setting out a strategic approach and does not trigger or lead to development in and of itself.	No LSE therefore no in-combination effect.	Screened out
KT2	*Sustainable Travel and Healthy Streets*	Policy KT2 prioritises and encourages the use of public and active transport modes and discourages car use within the Borough. It includes the improvement of safety, particularly with regard to cyclists and cycle facilities. Policy KT2 also includes that development should support the needs of future growth within the Borough.	This is a positive guidance policy to drive significantly improved environmental conditions in the RBKT area, including air quality. This improvement in environmental quality is driven primarily by human health considerations, however, an improvement in air quality through reductions in NOx concentrations	No LSE therefore no in-combination effect.	Screened out
KT3	*Car Parking and Car Free Development*	Policy KT3 encourages the use of sustainable transportation modes, including cycling and electric vehicles, and aims to promote public transport use where possible. It also aims to maintain and restrict new car parking developments.	This is a positive policy that promotes the use of public and active transport modes. Such activities potentially can lead to air quality improvements through reduced reliance on private motor vehicles and vehicles emitting GHG.	No LSE therefore no in-combination effect.	Screened out
KT4	*Sustainable Servicing*	Policy KT4 encourages the use of sustainable vehicles, such as low emissions vehicles, electric vehicles and bikes within deliveries.	This is a positive policy that promotes the use of sustainable and active transport modes. Such activities potentially can lead to air quality improvements through reduced reliance on vehicles emitting GHG.	No LSE therefore no in-combination effect.	Screened out

Policy	Heading	Summary of Policy	Screening of Likely Significant Effects (LSE)	In-Combination	Screened in / out?
KT5	*River Transport*	Policy KT5 seeks to preserve or enhance river infrastructure along the Thames in order to support its ongoing use for both transport and leisure activities.	This is a guidance policy that promotes the use of water-based transport options. Greater use of water-based transport can assist in reducing demand for road transport, which would complement measures to improve air quality. Additionally, by promoting leisure activities, this has the potential to divert pressure away from Habitats sites, specifically South West London Waterbodies SPA and Ramsar site.	No LSE therefore no in-combination effect.	Screened out
Implementing and Monitoring					
KI1	*Infrastructure and Developer Contributions*	Policy KI1 relates to the Council seeking to secure contributions to ensure that appropriate infrastructure is in place to support future developments. This includes the delivery of infrastructure set out in the Council's Infrastructure Delivery Plan, as well as specific infrastructure that is necessary to deliver an individual site.	This is a general policy associated with securing developer contributions on infrastructure delivery within the Borough and does not trigger or lead to development in and of itself. No effect pathways present.	No LSE therefore no in-combination effect.	Screened out
KI2	*Monitoring*	Policy KI2 refers to the monitoring of the implementation of planning policies within the Local Plan to assess progress as well as to understand the effectiveness of the plan's policies.	This policy is to ensure the local plan policies are effective by following a framework that has been prepared to set out the key performance indicators that will help track the delivery and performance of the Local Plan and therefore, no effect pathways present.	No LSE therefore no in-combination effect.	Screened out

7.2.55 Most of the policies in the RBKT Local Plan can be concluded not to pose a risk of LSE following the screening exercise. These policies inherently present no pathway of effects and generally set out general development or planning protection principles, largely without specifying a quantum of growth or development schemes.

7.2.56 Five policies; K2 – Locations for Sustainable Development, K3, Key Areas of Change, KH1, Meeting the Borough's Housing Needs, KN2 Open Spaces and KS3 School, College and University Facilities are screened in and, as such, require further consideration in this HRA at Stage 2 AA. In the case of Policies K2, K3, KH1 and KS3, they have the potential for increased traffic (and therefore impacts on air quality), and for all policies (K2, K3, KH1, KN2 and KS3) they may result in increased recreational and development pressures and therefore disturbance on nearby Habitats sites.

8 Detailed Screening Discussion

8.1.1 The results of the Screened in policies and allocations are outlined below. The discussion is presented by designated site and impact pathway. Table 8-1 summarise the impact pathways that are being considered for each site and which have been screened out.

Table 8-1 - Consideration of impact pathways

Impact Pathway	Richmond Park SAC	Wimbledon Common SAC	South West London Waterbodies SPA and Ramsar site	Thames Basin Heaths SPA	Mole Gap to Reigate Escarpment SPA
Air quality	Considered at screening		Screened out	Considered at screening	
Recreational pressure	Considered at screening				
Hydrological changes	Screened out			Considered at screening	Screened out
Urbanisation	Considered at screening		Screened out		
Impacts to FLL	Considered at screening				

8.1.2 Where relevant, reference has been made to corresponding SSSI units to a particular Habitats site. Natural England periodically assesses the conservation conditions of each SSSI unit, assigning it a status. The conservation status of each SSSI highlights any Habitats site that is currently particularly vulnerable to threats/pressures. Conservation status is defined as follows:

- Favourable;
- Unfavourable – recovering;
- Unfavourable – no change; or
- Unfavourable – declining.

8.1.3 SSSI units in either an ‘Unfavourable – no change’ or ‘Unfavourable – declining’ condition indicate that the Habitats site may be particularly vulnerable to certain threats or pressures. It is important to remember that the SSSI may be in an unfavourable state due to the condition of features unrelated to its designation. However, it is considered that the

conservation status of SSSI units that overlap with Habitats sites offer a useful indicator of habitat / species health at a particular location.

8.2 The South West London Water bodies SPA and Ramsar site

Recreational pressure due to public access / disturbance

8.2.1 This section considers the potential for LSE on both the South West London Waterbodies SPA and Ramsar site from recreational pressures as a result of proposed Local Plan led infrastructure delivery and housing development in the Borough.

8.2.2 The basis of this assessment lies with the average travel distance of residents within the Borough and the propensity to use Habitats sites as a recreational resource given the geographical location of the allocated sites noted in the emerging Local Plan.

8.2.3 Only three of the component waterbodies within the SPA/Ramsar site lie within 10km of proposed allocated sites (the closest being KNK18, 5.31km away from the SPA/Ramsar site) within the Borough and the immediate surrounds, and none fall within the Borough itself. Further waterbodies which are considered to be functionally-linked or supporting habitat are also present. The three waterbodies are:

- Knight & Bess Borough Reservoirs;
- Kempton Park Reservoirs – Redhouse Reservoir; and
- Kempton Park Reservoirs – Kempton Park East Reservoir.

8.2.4 All these waterbodies have different access arrangements. Knight and Bess Borough, the closest of the waterbodies associated with the SPA/ Ramsar site has no public access. Redhouse reservoir is also not accessible to the public, whilst Kempton Park East Reservoir has restricted public access which is via a membership scheme, open between dawn to dusk and allows for guide / assistance dogs only.

8.2.5 Given that for all waterbodies within the ZoI, public access is restricted or the site is completely private it is considered that any increase in the local population as a result of the Local Plan policies cannot be assumed to result in an impact of a significant increase in visitors to these sites. On these sites, visitor numbers and timing can be managed and dogs are prohibited which balances the interests of the site and retains the ecological functioning of the qualifying features. It is considered therefore that LSE from public access and recreational disturbance will not arise at these sites as a result of Local Plan policies.

8.2.6 Given the above, it is considered that no LSE on the SPA/Ramsar site will occur from any increase in population as a result of the Local Plan policies on housing.

8.2.7 The conclusion of no LSE means that mitigation measures are not considered to be required, however, mechanisms are already in place to bolster the protection of Habitats sites against such threats if required. Specific policies within the Local Plan will also serve to avoid, minimise and offset the potential impacts of recreational pressures on these sites.

Functionally Linked Land

8.2.8 This section considers the potential for LSE as a result of the presence of FLL within RBKT, which may be impacted directly or indirectly as a result of the Local Plan.

8.2.9 South West London Waterbodies SPA and Ramsar site is designated for wintering populations of Shoveler and Gadwall, which are reliant upon expanses of waterbodies.

8.2.10 As stated within the Richmond Upon Thames HRA for their Local Plan: *Natural England have advised that their recognised distance for the consideration of offsite functionally linked land is generally 2km, but for certain bird species, including most notably, golden plover Pluvialis apricaria and lapwing Vanellus vanellus, a greater distance of 15km may be appropriate.*

8.2.11 As the closest allocated site (KNK18) to this SPA is located 5.31km away, and this site is not designated for either golden plover or lapwing for which a greater buffer (15km) would need to be considered, no LSE resulting from damage or direct loss of FLL for this species will occur as a result of the Local Plan.

8.3 Wimbledon Common SAC

Air Quality

8.3.1 This section considers the potential for LSE on Wimbledon Common SAC from changes in air quality as a result of infrastructure delivery and housing development Local Plan policies in the Borough.

8.3.2 Information and data from APIS indicates the potential for exceedances of the relevant Critical Levels for NOx and NH_3, and Critical Loads for N deposition and acid deposition, within 200m of the A3 and A219. APIS data also shows that whilst woodland habitat which stag beetle inhabit are sensitive to N deposition, the stag beetles themselves are not with the APIS data stating under rationale for why the feature is not sensitive "*No expected negative impact on species due to impact on the species broad habitat".* This is likely as a result of nitrogen deposition on woodlands not being specifically linked to tree growth, but on other features such as ground flora diversity / structure, fungi and lichen populations, and therefore the cycle of tree growth and death (to provide the deadwood habitat for this species) is not impacted.

8.3.3 Furthermore, The CIEEM Advisory Note: Ecological Assessment of Air Quality Impacts[34] specifically references the impacts of N deposition on stag beetle, referencing the following[35]:

… For stag beetle, for example, a plentiful supply of dead wood with adequate moisture in the area of rot is the key requirement to preserve the population, such that the critical load for the habitat present is not particularly relevant…

… Stag beetle is associated with woodland and therefore the critical load range presented on APIS is that required to protect the botanical diversity of woodland. However, the ability of a site to support stag beetle is unrelated to its botanical diversity and strongly related to the presence of partially buried dead wood, a resource which will not be affected by changes in nitrogen deposition. Therefore, in reality, the ability of the SAC to meet its conservation objectives for stag beetle is unrelated to nitrogen deposition rates, notwithstanding the species association with a habitat that is itself sensitive. This is reflected on the APIS website, which clarifies that no negative effect on stag beetle is expected despite the sensitivity of its broad habitat.'

8.3.4 Table 5-1 reveals that all but one (SOB10) of the proposed site allocations fall within 10km of Wimbledon Common SAC, when the distance is measured 'as the crow flies'.

8.3.5 Some of these fall within close proximity of Wimbledon Common SAC with KNK22 (Kingston University) being the closest of the proposed site allocations (0.43km from Wimbledon Common at its closest point). There is therefore the potential for traffic generated from the site (and other nearby allocations) to pass along roads adjacent to Wimbledon Common SAC.

8.3.6 As part of the HRA[36] to support the Epsom and Ewell Borough Local Plan 2022-2040, air quality impacts on Wimbledon Common SAC were considered at screening stage which undertook a review of the Land Management Plan[37] for Wimbledon and Putney Commons. This identified that there were no qualifying habitats (heathland) within 200m of the A3, and a small area of heathland located within 200m of the A219. The A219 has the potential to form part of the main road network for proposed developments associated with the RBKT Local Plan and therefore impacts resulting from air quality for vehicles using this road

[34] CIEEM (2023) Advisory Note: Ecological Assessment of Air Quality Impacts. Available at: https://cieem.net/wp-content/uploads/2021/01/Air-Quality-advice-note-update-Oct-23.pdf. Accessed September 2026.
[35] Whilst the text referenced is specific to Richmond Common SAC, it is considered directly applicable to Wimbledon Common given the shared qualifying species and close proximity of the two sites.
[36] Lepus Consulting (2025) Habitat Regulations Assessment of the Epsom and Ewell Local Plan.
[37] Conserving the Commons. A Land Management Plan for Wimbledon and Putney Commons 2024 to 2034. Available here: https://www.wpcc.org.uk/downloads/land-management-plan/land-management-plan-final---february-2024-final-for-website.pdf. Accessed August 2026.

cannot entirely be ruled out, although as an indirect route for traffic associated with the site allocations it is considered unlikely to be routinely used.

8.3.7 Based on vehicle trips information supplied by RBKT's transport consultant City Science (Appendix D), by the end of the Local Plan period (2043), it is predicted that up to 1,022 cars per day on average (expressed as AADT) that are associated with the Local Plan site allocations could be travelling along the A3. Taking account of DfT forecast changes to the make-up of the vehicle fleet over time it is predicted that, of the generated traffic, between 74% and 91% (optimistic, based on a vehicle led decarbonisation scenario) of these vehicles would operate on zero emissions technologies (e.g. electric vehicles) – i.e. estimates for cars with an internal combustion engine giving rise to NOx and NH_3 emissions are between 266 and 95 AADT. The same is expected for base traffic. Consequently, it is expected and considered likely that in the future, ambient concentrations of NOx and NH_3 within 200m of roads will be noticeably lower, with a positive influence on associated nitrogen deposition and acid deposition rates and background pollution. That is not to say that the RBKT Local Plan would have no impact at the SAC – either alone or in-combination - but it would be much reduced than if increases in traffic were to occur in the present.

8.3.8 Although specific traffic and air quality modelling has not been completed to support the RBKT Local Plan with regards to Wimbledon Common, this exercise has been carried out to inform the HRA[38] for Richmond Local Plan, which is a neighbouring borough to RBKT and immediately adjacent to the SAC with the Local Plan being formally adopted in October 2026. This assessment considered the RBKT emerging Local Plan as part of the in-combination assessment, and therefore the results are directly applicable to this assessment. The findings of this air quality assessment (which was supported by modelled traffic data indicated that *"… the increase in AADT on roads within 200m of the Wimbledon Common SAC is significantly less than the 1,000 AADT screening threshold; therefore, there is no risk of an appreciable effect on air quality in-combination and further assessment should not be required."* Air Quality impacts as a result of the emerging Richmond local plan were considered at the screening stage, and screened out from requiring further assessment, with the findings stating: *based on the evidence accrued, it is considered that the proposed development within the borough does not have the potential to increase air pollution which could have a likely significant effect on the integrity of the Wimbledon Commons Special Area of Conservation'*.

8.3.9 Furthermore, The Draft London Local Plan[39] which was published for consultation on 16 July 2026, and for which the planned growth of RBKT formed a part of the assessment, concluded *the Draft London Plan will not result in a negative effect through the air quality*

[38] LUC 2023. Richmond Upon Thames: Regulation 19 Local Plan Habitat Regulations Assessment.
[39] AECOM 2026. Draft London Plan. Habitats Regulations Assessment.

impact pathway on Wimbledon Common SAC alone or in combination with other plans and projects. However, it also stated: *it is recommended that air quality modelling for the SAC be undertaken to inform HRAs of local development plans*.

8.3.10 Taking the above into consideration and applying the precautionary principle, it is not possible to rule out potential effects on Wimbledon Common SAC due to changes in air quality. This is on the basis of the HRA for the Draft London Plan recommending that air quality modelling should be undertaken, and the potential for traffic arising from the A219 to result in air quality impacts on qualifying features of the SAC within 200m of this road.

Recreational Pressure due to public access / disturbance

8.3.11 This section considers the potential for LSE on Wimbledon Common SAC from recreational pressures as a result of proposed Local Plan led infrastructure delivery and housing development in the Borough.

8.3.12 The basis of this assessment lies with the average travel distance of residents within the Borough and the propensity to use Habitats sites as a recreational resource given the geographical location of the allocated sites noted in the emerging Local Plan.

8.3.13 The closest allocated site, proposing 120 units, is KNK27 Kingston University which is located 0.43km from the SAC. All other allocated sites, with the exception of one (SOB10) fall within 10km of the SAC.

8.3.14 The 10km average trip distance from allocations has been used as a precautionary figure to screen the likelihood of new residents visiting any individual Habitats site. When considering other distance criteria to use, a review of available visitor surveys and Habitats sites within, and in proximity to London demonstrates that visitor pressure is most likely to arise from a smaller catchment area than the 10km applied at this screening stage.

8.3.15 The results obtained from Epping Forest surveys of visitor pressure (Liley *et al,* 2018) identified a threshold of 6.2km where visitor numbers from outside this area dropped to ‘very low’.

8.3.16 The results obtained from a similar survey at Burnham Beeches (Liley *et al,* 2018) under an identical methodology identified that visitor numbers dropped to a ‘low’ threshold of 5km from the Habitats sites.

8.3.17 Furthermore, as discussed in Section 8.5.9, a distance of up to 7km has been referenced with regards to recreational impacts resulting from new residential development within proximity to the Thames Basin Heaths SPA.

8.3.18 When taken together, it is considered appropriate to consider site allocations within 7km as an appropriate distance for potential LSE as a result of recreational disturbance resulting from the allocated sites noted in the emerging Local Plan. This reduced 7km ZoI still accounts for a large majority of the allocated sites (KNK1-KNK31, SUR01-SUR06, NOM01-NOM08, SOB01-SOB03, SOB05 and SOB08).

8.3.19 A review of the condition of the SSSI units which comprise Wimbledon Common SAC indicates that all are 'unfavourable recovering' with the exception of Unit 1026633 which is cited as being 'unfavourable – no change'.

8.3.20 It should be noted that the HRA prepared for the Draft London Plan concluded the following for Wimbledon Common *'It is therefore considered that the scale of growth proposed for Merton, Kingston and Wandsworth in the London Plan is not likely to result in a significant recreational pressure effect on Wimbledon Common SAC alone or in combination with other plans and projects.*

8.3.21 This conclusion was on the basis of a review of HRAs to support Local Plans for neighbouring Boroughs (Merton and Wandsworth) which both concluded that the SAC features of Wimbledon Common were not likely to be affected by the large scale of housing planned for the boroughs either alone or in combination with other projects and plans. It also undertook a review of the Land Management Plan (LMP) for Wimbledon and Putney Commons in which a number of actions are proposed to protect the qualifying features of this SAC.

Assessment of potential effects

8.3.22 The SIP for Wimbledon Common SAC identifies that high visitor usage to the site causes damage to sensitive habitats, and results in adverse impacts such as compaction around the base of mature trees and the removal of fallen timber. Given the close proximity of some of the allocated sites to Wimbledon Common SAC, increased recreational pressure as a result of additional housing within the Borough as set out under Policies K2, K3, KH1 and KN2 of the Local Plan is considered to be a risk to this Habitats Site. Additionally, Policy KS3 relates to development as part of Kingston University. As the University (KNK27) is within 0.43km of Wimbledon Common SAC and therefore in walking distance to the SAC, any development here could result in increased recreational pressure.

Conclusions

8.3.23 LSE cannot be ruled out for Wimbledon Common SAC as a result of increased recreational pressure led by Local Plan policies within the Borough. As such further Stage 2 Appropriate Assessment is required.

Urbanisation

8.3.24 As set out above in Table 7-2, there is one allocated site, KNK29 located within 0.43km of the boundary of the SAC. Wimbledon Common is primarily designated for its population of stag beetle, which are dependent upon the availability of dead or rotting wood. This can be controlled though the management of the habitats where this species is present and therefore, the effects of urbanisation are considered unlikely to impact populations of stag beetle, providing these areas are managed appropriately.

8.3.25 The Land Management Plan for Wimbledon and Putney Commons[40] includes actions to preserve and protect dead wood for the benefit of wildlife, including the following: "*As a deliberate management policy standing dead timbers, unless unsafe, are left in situ for the benefit of wildlife, as are fallen and decaying timbers, which especially benefits stag beetles, a key species for the SAC status*" .

8.3.26 Cat predation as a result of urbanisation is not considered as part of this screening, as stag beetle are not susceptible, given they live the majority of their lifecycle underground, and due to the presence of a number of roads separating the allocated site from the SAC, the collision risk is too great that it is not considered that any cats will reach the SAC.

8.3.27 Given the above, it is considered that no LSE on the SAC will occur from any increase in population as a result of the Local Plan policies on housing, particularly considering that mechanisms are already in place via management plans to ensure the protection of Habitats sites against such threats if required.

Functionally Linked Land

8.3.28 This section considers the potential for LSE as a result of the presence of FLL within RBKT, which may be impacted directly or indirectly as a result of the Local Plan.

8.3.29 Research has shown that whilst female stag beetle rarely fly, male stag beetle can fly up to 2km during the breeding season, as such, a 2km buffer has been applied for this assessment, with two site allocations – KNK27 and NOM03 - falling within this 2km buffer.

8.3.30 The habitat requirement for this species is for dead or rotting wood, with the larvae spending several years underground before the adult stag beetle emerge. Whilst there is the potential for small areas of suitable habitat to be present at the proposed site allocations within 2km, it is considered that due to the niche habitat requirements for this species, any individuals that may be present within these site allocations are transitory, and the removal of such habitat through development at the proposed site allocations would not result in a significant impact on the population for which the SAC is designated.

8.3.31 Therefore, no LSE are predicted in relation to Wimbledon Common SAC as a result of impacts to FLL for stag beetle.

[40] Wimbledon and Putney Commons (2024) Conserving the Commons. A Land Management Plan for Wimbledon and Putney Commons 2024-2034.

8.4 Richmond Park SAC

Air Quality

8.4.1 Whilst Richmond Park SAC is located within the 10km ZoI, no current threats or pressures were identified in the SIP for Richmond Park SAC, or on the Natura 2000 form for this SAC. In addition, data taken from APIS concludes that whilst woodland which supports the Stag beetle for which the SAC is designated, is vulnerable to N deposition, the Stag beetle itself is not sensitive to nitrogen impacts on broad habitat types, with the APIS data stating under rationale for why the feature is not sensitive' '*No expected negative impact on species due to impact on the species broad habitat'* This is likely as a result of nitrogen deposition on woodlands not specifically linked to tree growth, but on other features such as ground flora diversity / structure, fungi and lichen populations, and therefore the cycle of tree growth and death (to provide the deadwood habitat for this species) is not impacted.

8.4.2 Furthermore, The CIEEM Advisory Note: Ecological Assessment of Air Quality Impacts[41] specifically references the impacts of N deposition on stag beetle at Richmond Park, referencing the following:

… For stag beetle, for example, a plentiful supply of dead wood with adequate moisture in the area of rot is the key requirement to preserve the population, such that the critical load for the habitat present is not particularly relevant…

… Stag beetle is associated with woodland and therefore the critical load range presented on APIS is that required to protect the botanical diversity of woodland. However, the ability of a site to support stag beetle is unrelated to its botanical diversity and strongly related to the presence of partially buried dead wood, a resource which will not be affected by changes in nitrogen deposition. Therefore, in reality, the ability of the SAC to meet its conservation objectives for stag beetle is unrelated to nitrogen deposition rates, notwithstanding the species association with a habitat that is itself sensitive. This is reflected on the APIS website, which clarifies that no negative effect on stag beetle is expected despite the sensitivity of its broad habitat.'

8.4.3 The HRA in support of the Richmond Upon Thames Local Plan identified the absence of qualifying features of the SAC within 200m of the identified strategic road network. This is directly applicable to RBKT as the identified road network overlaps.

[41] CIEEM (2023) Advisory Note: Ecological Assessment of Air Quality Impacts. Available at: https://cieem.net/wp-content/uploads/2021/01/Air-Quality-advice-note-update-Oct-23.pdf. Accessed September 2026.

"Habitats present within 200m of the strategic roads were comprised solely of lowland acidic grassland, which is neither a qualifying feature nor supports the qualifying feature within the Site".

8.4.4 Furthermore, the HRA to support the Draft London Local Plan stated:

"As such it can be concluded that the Draft London Plan does not have any impact pathways that could interact with the SAC in a manner that would prevent it achieving its conservation objectives for stag beetle".

8.4.5 This conclusion is on the basis of N deposition not directly affecting tree growth (as detailed within 8.4.1) as well as interventions outlined in the London Environment Strategy and Mayor's Transport Strategy resulting in *"…a 40 per cent reduction in NOx by 2020, a 55 per cent reduction by 2025 and a 65 per cent reduction by 2030…."*

8.4.6 Given the above, it is considered that no air quality associated LSE on the SAC will occur from any increase in vehicle movement as a result of the Local Plan policies.

Recreational pressure due to public access / disturbance

8.4.7 As set out above in 8.4.1, the SIP for Richmond Park SAC does not list any current pressures or threats for this Habitats site.

8.4.8 The HRA for the London Borough of Richmond Upon Thames Local Plan states: *"… stag beetle* […] *are not susceptible to recreational impacts at this location because the site is managed to ensure that the deadwood habitats which they depend upon is maintained. In addition to this, the majority of this species lifecycle is reliant on deadwood habitat located underground, and as such impacts are considered to be limited and unlikely to result in a reduction in the extent and availability of this habitat for this species"*

LSE resulting from recreational pressure were therefore screened out either alone or in-combination with other plans and policies, on the qualifying features of the SAC.

8.4.9 The HRA to support the Draft London Local Plan stated:

"The presence of mature trees and deadwood would be affected by habitat management but not by development identified within the Draft London Plan' and Following Appropriate Assessment, it was determined that it could be concluded that there are no adverse effects on integrity of the Richmond Park SAC as a result of recreational disturbance alone or in combination with other plans and projects".

This conclusion was on the basis of the findings of the HRA for the Richmond Upon Thames Local Plan (see 8.4.6 above).

8.4.10 It is therefore considered that the proposed site allocations will not result in a LSE, either alone or in-combination with other plans or policies, on the qualifying feature of Richmond Park SAC.

Urbanisation

8.4.11 As set out above in Table 7-2, there is one allocated site, KNK27 located within 0.12km of the boundary of the SAC. Richmond Park SAC is primarily designated for its population of stag beetle, which are dependent upon the availability of dead or rotting wood. This can be controlled though the management of the habitats where this species is present and therefore, the effects of urbanisation are considered unlikely to impact populations of stag beetle, providing these areas are managed appropriately.

8.4.12 Richmond Park SAC falls under the management of the Royal Parks, with each park having a management plan that spans a period of 10 years. Each management plan is reviewed every five years, and a full redraft is published every 10 years.

8.4.13 The Richmond Park Management Plan[42] includes for measures for the management of deadwood resource to ensure a continuation of the supply of deadwood, including the following:

- *"Sensitive management of living veteran trees using specialist pruning techniques including natural fracture and retrenchment pruning to prolong their lives and increase vigour.*
- *Retention of aerial deadwood where risk management will allow, including using "deadwood stabilising" techniques rather than complete deadwood removal.*
- *Retention of standing deadwood as "monoliths" – the retention of standing trees in public areas by significantly reducing the height and spread and leaving them to decay in a standing position.*
- *Retention of fallen deadwood in situ in large pieces close to the parent tree.*
- *Where veteran trees represent a safety risk, rather than removing or monolithing them, the tree can be fenced or other target zone management measures put in place to mitigate the risk."*

8.4.14 As set out above for Wimbledon Common, cat predation as a result of urbanisation is not considered as part of this screening, as stag beetle are not susceptible given they live the majority of their lifecycle underground and, due to the presence of a number of roads separating the allocated site from the SAC, the collision risk is too great that it is not considered that any cats will reach the SAC.

8.4.15 Given the above, it is considered that no LSE on the SAC will occur from any increase in population as a result of the Local Plan policies on housing particularly considering that

[42] Richmond Park Management Plan 2019-2029. Available at: https://www.royalparks.org.uk/media/2416/download?attachment. Accessed September 2026

mechanisms are already in place via management plans to ensure the protection of the Habitats site against such threats if required.

Functionally Linked Land

8.4.16 This section considers the potential for LSE as a result of the presence of FLL within RBKT, which may be impacted directly or indirectly as a result of the Local Plan.

8.4.17 Research has shown that whilst female stag beetle rarely fly, male stag beetle can fly up to 2km during the breeding season, as such, a 2km buffer has been applied for this assessment. Thirty allocated sites (KNK1-KNK17, KNK19-KNK27, KNK29-KNK31 and NOM07) fall within this 2km buffer.

8.4.18 The habitat requirement for this species is for dead or rotting wood, with the larvae spending several years underground before the adult stag beetle emerge. Whilst there is the potential for small areas of suitable habitat to be present at the proposed site allocations within 2km, it is considered that due to the niche habitat requirements for this species, any individuals that may be present within these site allocations are transitory, and the removal of such habitat through development at the proposed site allocations would not result in a significant impact on the population for which the SAC is designated.

8.4.19 Therefore, no LSE are predicted in relation to Richmond Park SAC as a result of impacts to FLL for stag beetle.

8.5 Thames Basin Heaths SPA

Air Quality

8.5.1 This section considers the potential for LSE on Thames Basin Heaths SPA from changes in air quality as a result of infrastructure delivery and housing development Local Plan policies in the Borough.

8.5.2 Only one component of the Thames Basin Heaths SPA is located within 10km of the ZoI and within the key commuting area. This is the component which is underpinned by Ockham and Wisley Commons SSSI. This area of the SPA lies immediately to the south of the M25 mainline at M25 Junction 10. Traffic associated with the Local Plan site allocations is expected to connect with the M25 at this junction via the A3, and some associated traffic is likely to use the A3 to connect to locations beyond this to the south. This means that traffic associated with the Local Plan is likely to pass within 200m of the SPA.

8.5.3 The review of APIS indicates the potential for exceedances of the relevant Critical Levels for NOx and NH_3, and Critical Loads for N deposition and acid deposition within 200m of the M25 and A3. For the relevant features (bird species), APIS reports that for the modelled baseline background pollutant levels representing the year 2023, there is *"Potential negative impact on species due to impacts on the species' broad habitat"*.

8.5.4 Table 5-1 reveals that three of the proposed site allocations (SOB06, SOB09 and SOB10) fall within 10km of Thames Basin Heaths SPA, when the distance is measured ‘as the crow

flies'. Both SOB06 and SOB10 are listed as non-residential development, whilst SOB09, which is 9.79km away from the SPA has 265 units proposed. There is however the potential for traffic generated from these allocations to pass along roads adjacent to Thames Basin Heaths SPA.

8.5.5 Based on vehicle trips information supplied by RBKT's transport consultant City Science (Appendix D), by the end of the Local Plan period (2043), it is predicted that up to 2,786 cars per day on average (expressed as AADT) that are associated with the Local Plan site allocations could be travelling along routes in the general direction of the M25 Junction 10. Proportions of this number are likely to also travel east and west along the M25 mainline and along the A3 to the south of the junction. Taking account of DfT forecast changes to the make-up of the vehicle fleet over time it is predicted that, of the generated traffic, between 74% and 91% (optimistic, based on a vehicle led decarbonisation scenario) of these vehicles would operate on zero emissions technologies (e.g. electric vehicles) – i.e. estimates for cars with an internal combustion engine giving rise to NOx and NH_3 emissions are between 724 and 258 AADT. The same is expected for base traffic. Consequently, it is expected and considered likely that in the future, ambient concentrations of NOx and NH_3 within 200m of roads will be noticeably lower, with a positive influence on associated nitrogen deposition and acid deposition rates and background pollution. That is not to say that the RBKT Local Plan would have no impact at the SPA – either alone or in-combination - but it would be much reduced than if increases in traffic were to occur in the present.

8.5.6 A review of the condition of the SSSI units (relevant to Ockham and Wisley Commons) which comprise the Thames Basin Heaths SPA are a mix of 'unfavourable recovering' and 'favourable', despite the close proximity to the M25 and A3, including a major junction.

8.5.7 The HRA to support the Draft London Plan considered the impacts of air quality on this SPA, and stated the following evidence: *transport and air quality modelling for local authorities immediately around this SPA (e.g. for the HRA of Guildford Local Plan (*the Borough in which the relevant part of the SPA is located*)) have concluded that even allowing for the expected 'in combination' growth in traffic to c. 2033 from all sources, there is expected to be a net improvement in air quality adjacent to those roads as a result of improved background air quality and vehicle emissions.*

8.5.8 As part of this assessment, the HRA further states with regards policy: '*the expectation is that overall, the Mayor's air quality policies and air quality strategy will generally improve air quality (as will initiatives to reduce use of private cars) over the plan period. Of relevance to European sites situated outside London, the conclusion of the Supporting Evidence Outcomes Summary Report for the Mayor's Transport Strategy is that "With the MTS, by 2041, travel will have risen by around a quarter but car travel will have fallen by around a third. There would be at least 3 million fewer car trips per day (compared to 2015) and 250,000 fewer cars owned in London* […]*. Fewer cars in London should translate into a net decrease in the use of cars for journeys to work to destinations outside London particularly*

since it is already the case that far more journeys to work are from surrounding authorities into London, rather than from London into surrounding authorities".

8.5.9 It was concluded that following appropriate assessment, there would be no adverse impacts on the SPA from the Draft London Plan.

8.5.10 Taking the above conclusions into consideration, whereby the growth within RBKT has been considered as part of the HRA in support of the Draft London Plan, it is concluded that there are no LSE on the SPA with regards to air quality impacts resulting from the Local Plan policies.

Recreational pressure due to public access / disturbance

8.5.11 As set out in 8.5.4, three of the proposed site allocations fall within 10km of the Thames Basin Heaths SPA, the closest being SOB06, approximately 8.13km away (as the crow flies).

8.5.12 The potential effects of residential development upon the integrity of the SPA as a result of increased recreational disturbance and pressure has been considered for a long time and has led to the development of a strategic framework for mitigation across the Thames Basin Heaths Area known as the TBH SPA Delivery Framework[43]

8.5.13 Based on this framework, a number of local planning authorities where a constituent part of the wider Thames Basin Heaths SPA network is located, have provided relevant guidance setting out an area over which recreational impacts upon the SPA are likely from new development. This includes Guildford Borough Council, within which Ockham and Wisely Commons SSSI is located. Policy P5 of this local plan sets out the following principles:

- *There is an 'exclusion zone' set at 400m linear distance from the SPA boundary. Permission will not be granted for development that results in a net increase in residential units within this zone. Proposal for other types of development within this zone must undertake HRA to demonstrated they will not harm the integrity of the SPA.*
- *There is a 'zone of influence' between 400m and 5km linear distance from the SPA boundary. Where net new residential development is proposed within the zone of influence, avoidance and mitigation measures must be delivered prior to occupation of new dwellings and in perpetuity. Measures must be based on a combination of 1) the provision, improvement and/or maintenance of Suitable Alternative Natural Greenspace (SANG) and 2) Strategic Access Management and Monitoring (SAMM).*

[43] Thames Basin Heaths Joint Strategic Partnership Board (2009) Thames Basin Heaths Special Protection Area Delivery Framework. Available at: https://www.bracknell-forest.gov.uk/sites/default/files/2021-08/thames-basin-heaths-spa-delivery-framework.pdf. Accessed September 2026.

- *Residential development of over 50 net new dwellings that falls between five and seven kilometres from the SPA may be required to provide avoidance and mitigation measures. This will be assessed on a case-by-case basis and in consultation with Natural England.*

8.5.14 Furthermore, the Draft London Plan identified a core recreational catchment of 5km, with this distance derived from visitor survey work undertaken for authorities surrounding the SPA.

8.5.15 Given that the closest proposed allocation site is more than 8km from the SPA, when taking into account the above distances, it is considered that no LSE on the SPA site will occur from any increase in population as a result of the Local Plan policies on housing.

Hydrological changes

8.5.16 This section considers the potential for hydrological changes to Thames Basin Heaths SPA as a result of infrastructure delivery and housing development Local Plan policies in the Borough.

8.5.17 As set out in Table 7.2, the SIP references impacts to H4010 Wet heathland with cross-leaved heath and H7150 Depressions on peat substrates as the qualifying features sensitive to hydrological changes at particular component parts of the Thames Basin Heaths SPA. As stated in 8.5.2, only the Ockham and Wisley Commons SSSI component part of the SPA is considered within the HRA, which is not referenced specifically as sensitive within the SIP. Most pertinently the SPA site is not hydrologically connected to the RBKT plan area.

8.5.18 As a result, it is considered that there will be no LSE resulting from changes in water quality or quantity from growth associated with the Local Plan policies and, as such, it is scoped out of further assessment.

Functionally Linked Land

8.5.19 This section considers the potential for LSE as a result of the presence of FLL within RBKT, which may be impacted directly or indirectly as a result of the Local Plan.

8.5.20 The Thames Basin Heaths SPA is designated for populations of European Nightjar, woodlark and Dartford Warbler, which are reliant upon heathland habitat.

8.5.21 As stated within the Richmond Upon Thames HRA for their Local Plan: *Natural England have advised that their recognised distance for the consideration of offsite functionally linked land is generally 2km, but for certain bird species, including most notably, golden plover Pluvialis apricaria and lapwing Vanellus vanellus, a greater distance of 15km may be appropriate.*

8.5.22 As the closest allocated site (SOB06) to this SPA is located 8.13km away, and this site is not designated for either golden plover or lapwing for which a greater buffer (15km) would

need to be considered, no LSE resulting from damage or direct loss of FLL for this species will occur as a result of the Local Plan.

8.6 Mole Gap to Reigate Escarpment SAC

Air Quality

8.6.1 This section considers the potential for LSE on Mole Gap to Reigate Escarpment SAC from changes in air quality as a result of infrastructure delivery and housing development Local Plan policies in the Borough.

8.6.2 The review of both APIS and Defra's webpages indicates the potential for exceedances of the relevant Critical Levels and Critical Loads for NO_x, NH_3 and N deposition, respectively.

8.6.3 Based on vehicle trips information supplied by RBKT's transport consultant City Science, by the end of the Local Plan period (2043), it is predicted that up to 3,462 cars per day on average (expressed as AADT) that are associated with the Local Plan site allocations could be travelling along routes in the general direction of Mole Gap to Reigate Escarpment SAC (Appendix D). It is not certain however how many of these additional trips would actually travel along routes within 200m of the SAC. A possible route for some of the traffic is along the A24 near Mickleham (south of Leatherhead), with proportions of the traffic taking the M25 in clockwise and anticlockwise directions. Nonetheless, taking account of DfT forecast changes to the make-up of the vehicle fleet over time, it is predicted that, of the generated traffic, between 74% and 91% (optimistic, based on a vehicle led decarbonisation scenario) of these vehicles would operate on zero emissions technologies (e.g. electric vehicles) – i.e. estimates for cars with an internal combustion engine giving rise to NOx and NH_3 emissions are between 900 and 321 AADT. The same is expected for base traffic. Consequently, it is expected and considered likely that in the future, ambient concentrations of NOx and NH_3 within 200m of roads will be noticeably lower, with a positive influence on associated nitrogen deposition and acid deposition rates and background pollution. That is not to say that the RBKT Local Plan would have no impact at the SAC – either alone or in-combination – but it would be much reduced than if increases in traffic were to occur in the present.

8.6.4 Table 5-1 reveals that five of the proposed site allocations (SOB04, SOB06, SOB07, SOB09 and SOB10) fall within 10km of Mole Gap to Reigate Escarpment SAC, when the distance is measured 'as the crow flies', the closest being SOB10, 6.67km away. Of these allocations, SOB06 and SOB10 are listed as non-residential, whilst combined, SOB04, SOB07 and SOB09 propose a total of 305 units. There is therefore the potential for traffic generated from these to pass along roads adjacent to Mole Gap to Reigate Escarpment SAC.

8.6.5 The M25 lies within 200m of the SAC and therefore may comprise a significant route for those commuting to work from RBKT. At its closet point, the M25 lies within approximately 70m, with the majority of the SAC being at least 100m from this road network. The SSSI unit of relevance is Unit 23 of Mole Gap to Reigate Escarpment SSSI, comprising calcareous grassland. It is currently recorded as being in 'unfavourable - recovering' condition.

8.6.6 As detailed within the Draft London Local Plan, detailed habitat surveys were undertaken by RPS[44] in June 2017 of this area of the SAC to inform the HRA screening of the Gatwick 2 project, with the key findings of this survey identifying that *"the grassland was of a condition unlikely to support SAC quality orchidaceous rich grassland'.* Furthermore, the same report cited Natural England as confirming that '*neither natural box scrub nor yew-dominated woodland occur within Unit 23 (that located within 200m of the M25). There is also no heathland within the relevant part of the SAC"'*. As a result, following these detailed habitat surveys, air quality LSE arising from increased traffic on the M25 were able to be screened out for this project.

8.6.7 Overall, the HRA for the Draft London Plan concluded that "*it is possible to conclude that following appropriate assessment there would be no adverse Impacts on the SAC from the Draft London Plan*".

This conclusion is on the basis of the findings of the RPS survey which highlighted the absence of qualifying habitat within 200m of the M25, as well as specific air quality policies within the Draft London Plan, the Mayor's Transport Strategy and the London Environment Strategy which are expected to result in a considerable net improvement over the plan period and beyond, whilst allowing for growth in population and jobs over the same time period.

8.6.8 Taking the above into consideration, it is concluded that there are no LSE on the SAC with regards to air quality impacts resulting from the Local Plan policies.

Recreational pressure due to public access / disturbance

8.6.9 As set out in 8.6.1, five of the proposed site allocations fall within 10km of the Mole Gap to Reigate Escarpment SAC, the closest being SOB10, approximately 6.67km away (as the crow flies).

8.6.10 Mole Valley Local Plan 2020-2039 (the district in which the SAC is located) was adopted in October 2024. Policy EN9 (8) of this local plan states:

Within the Mole Gap to Reigate Escarpment Special Area of Conservation (SAC)… there will be a strong presumption against new development unless the impact on the integrity of the SAC can be mitigated. An Environmental Impact Assessment and Habitats Regulations Assessment will be required. Development proposals for sites within 1.5km of the SAC will be required to meet the requirements of the Habitats Directive, particularly in relation to the Bechstein's bat qualifying feature. Habitats suitable for foraging and commuting bats from the SAC (such as deciduous woodland, mature treelines, species rich pasture or river corridors) must be preserved unless surveys demonstrate that they are not used by bats.

[44] RPS (2017) Mole Gap to Reigate Escarpment – Site Survey by RPS

8.6.11 The closest allocated site for the RBKT Local Plan is located considerably further than 1.5km from this SAC and, due to the built-up nature of RBKT, it is lacking the key woodland habitat for which Bechstein's bats are reliant upon.

8.6.12 Furthermore, the HRA to support the Draft London Plan concluded with regards to recreational pressure on this SAC: *Since it is not a conveniently situated site for casual recreational visits for most Londoners, and London (particularly the boroughs closest to the SAC) has a large amount of its own high quality recreational natural greenspace, recreational pressure from the Draft London Plan is unlikely to arise either alone or in combination.*

8.6.13 Additionally, when considering a 7km ZoI as referenced as the maximum distances considered for Wimbledon Common SAC and Thames Basin Heaths SPA, only one allocated site (SOB10) falls within this zone, however this is listed as a non-residential allocation.

8.6.14 As a result, taking into account the above, it is considered that no LSE on the SAC will occur from any increase in population as a result of the Local Plan policies on housing.

Functionally Linked Land

8.6.15 This section considers the potential for LSE as a result of the presence of FLL within RBKT, which may be impacted directly or indirectly as a result of the Local Plan.

8.6.16 Mole Gap to Reigate Escarpment SAC is designated for Bechstein's bat which are reliant upon broadleaved woodland habitat, using stream corridors and hedgerows to commute to foraging habitat.

8.6.17 The Bat Conservation Trust (BCT)[45] has defined a number of species-specific Core Sustenance Zones (CSZ). A CSZ refers to an area surrounding a communal roost within which habitat availability and quality will have a significant influence on the reliance and conservation status of a colony using the roost. For Bechstein's Bat, a CZS of 3km has been given to take into account its very specific habitat requirements.

8.6.18 As the nearest allocated site (SOB10) is located 6.67km away from the SAC, no LSE resulting from damage or direct loss of FLL for this species will occur as a result of the Local Plan.

8.7 In-combination assessment

8.7.1 The Habitats sites considered in this assessment alone sit within the geographical area surrounded by six Boroughs either within Greater London or on the edge of London:

[45] BCT (2020) Core Sustenance Zones and habitats of importance for designing Biodiversity Net Gain for bats. Bat Conservation Trust, London.

Richmond upon Thames, Elmbridge, Wandsworth, Merton, Sutton and Epsom and Ewell. The London Plan developed by the Greater London Authority (GLA) also covers the RBKT Area.

8.7.2 For each of the Local Plans there are also reports to inform the HRA and these have been consulted where available in this in-combination assessment. The findings from this work are summarised below.

8.7.3 London Borough of Richmond upon Thames: The Richmond Local Plan 2024-2039 was formally adopted in October 2025. The HRA to support the Regulation 19 Assessment concluded no adverse effects on the integrity of relevant Habitats Sites will occur, subject to the provision of safeguarding and mitigation measures set out within the report.

8.7.4 Elmbridge Borough Council: The Regulation 19: Draft Elmbridge Local Plan 2022-2037 was withdrawn in September 2024, after stage 2 of the examination in public whereby the draft plan was found to be unsound as submitted. Elmbridge Council is currently preparing a new 15-year local plan, but there is no HRA available in the evidence database.

8.7.5 London Borough of Wandsworth Local Plan, along with supporting documents, was submitted to the Secretary of State for independent examination in public on 29 April 2022, with the plan formally adopted in July 2023. The HRA screening report submitted to support this examination concluded: *In summary, this screening assessment has not identified any significant adverse effects on any Natura 2000 site; particularly Wimbledon Common SAC or Richmond Park SAC.*

8.7.6 A partial review of the plan is currently being undertaken with regards an update and review of planning policies. As part of this, a HRA[46] to support the partial review has been undertaken, with this also concluding the proposals are '*unlikely to have adverse effects on the European Sites or their integrity'*.

8.7.7 London Borough of Merton: The Local Plan and Policies Map was submitted to the Secretary of State on 2 December 2021. The supporting HRA concluded the Local Plan '*will not lead to adverse effects on the integrity of European sites either alone, or in combination with other plans and projects*.' (Merton Council 2021) An update to the HRA report was undertaken in May 2022 as a result of modifications to the Local Plan which concluded that '*the overall findings of the submitted HRA remains'.* (Merton Council 2022). The Local Plan for this borough was adopted in November 2024.

8.7.8 London Borough of Sutton adopted their Local Plan in February 2018 setting out the planning strategy and policies for the Borough until 2031. The HRA to support the

[46] Wandsworth Habitat Regulations Assessment (HRA) Screening Report. Wandsworth Local Plan Partial Review (LPPR).

examination of the Local plan cannot be found in the evidence database, however, in response to a query raised by the Inspector during examination the council stated: *the council considers it extremely unlikely that Sutton's Local Plan, either alone, or in combination with other plans or projects, will have significant effects on any of the European sites identified in Sutton's original HRA report prepared in February 2016.* The Council is currently producing a New Local Plan which will guide development in the borough between 2024-2041, with the consultation for the regulation 19 stage taking place during June-July 2026. A HRA to support this local plan cannot be found in the evidence database.

8.7.9 Epsom and Ewell Borough Council: The Local Plan is currently under examination and is expected to be adopted later this year. The supporting HRA concluded no adverse impacts on the site integrity of any Habitats site due to a change in air quality, water quality or quantity or an increase in recreational pressure as a result of the Local Plan either alone or in-combination.

8.7.10 The London Plan (Greater London Authority) also covering RBKT and the above listed London Boroughs and was adopted in 2021, however it is reviewed every five years. The current Draft Local Plan is open for consultation, with examination anticipated in 2027. The HRA[47] to support the Draft London Local Plan states:

"Following appropriate assessment, it could be concluded that there were no adverse effects on integrity on the majority of the Habitats Sites. The identified impact pathways could have a detrimental impact on some sites where either changes to the Draft London Plan were recommended or additional information was identified as being required."

8.7.11 The recommendations made were with regards impacts arising from air pollution on Epping Forest SAC and Wimbledon Common SAC. For Epping Forest, this recommendation is not considered relevant to RBKT due to the distance away from the borough. The recommendation for Wimbledon Common SAC however is of relevance and states:

"Wimbledon Common SAC: It was recommended that air quality modelling be conducted in relation to the SAC to inform HRAs of future development projects brought forward under the development plan."

8.7.12 As no HRA documentation is available for Elmbridge Borough Council and London Borough of Sutton, it is unknown if LSE exist as a result of their emerging Local Plans. Additionally, the HRA to support the Draft London Local Plan made recommendation with regards to Wimbledon Common SAC in relation to air quality impacts. As such, taken together, in-combination LSE cannot be ruled on Habitats sites as a result of policies (K2, K3, KH, KN2

[47] AECOM 2026. Draft London Plan. Habitats Regulations Assessment.

and KS3) and a number of site allocations in the emerging Local Plan when considered with other strategic plans.

9 Stage 2 Appropriate Assessment

9.1.1 A number of policies and site allocations were screened-in at HRA Stage 1 Screening.

9.1.2 The following RBKT Policies were screened-in:

- K2 – Locations for Sustainable Development;
- K3 – Key Areas of Change;
- KH1 – Meeting the Borough's Housing Needs;
- KN2 – Open Spaces; and
- KS3 – School, College and University Facilities.

9.1.3 The impact pathways forming a basis of this screening were identified as follows:

- In the case of Policies K2, K3, KH1 and KS3, they have the potential for increased traffic (and therefore impacts on air quality) on Wimbledon Common SAC.
- All five policies were screened-in due to potential increased recreational pressures and therefore disturbance on Wimbledon Common SAC.

9.1.4 For the air quality impact pathway, all site allocations listed in Table 5-1, with the exception of one (SOB10, Silverglade Business Park) were screened in as they are located within the 10km ZoI identified for impacts arising from air quality.

9.1.5 For recreational pressure, the ZoI was reduced to 7km when taking into account the findings from visitor surveys undertaken for other Habitats Sites. This reduced 7km ZoI still accounts for 41 of the allocated sites and comprises KNK1-KNK31, SUR01-SUR06, NOM01-NOM08, SOB01-SOB03, SOB05 and SOB08 as listed in Table 5-1.

9.2 Wimbledon Common SAC

Air Quality

9.2.1 Following the Stage 1 Screening, impacts arising from changes to air quality LSE as a result of the Local Plan were screened in for further assessment for Wimbledon Common SAC.

9.2.2 As set out within Section 8.3, stag beetle are not considered sensitive to N deposition, and as such, this appropriate assessment only considers impacts to the qualifying heathland habitats for which the SAC is designated for, and not the qualifying species.

9.2.3 Wimbledon Common is situated within Merton and Wandsworth boroughs, with both Local Plans for these Borough's having been adopted[48,49].

9.2.4 Furthermore, it has been determined via assessment work for other boroughs neighbouring RBKT that have undertaken HRA to support their Local Plans, that there is no qualifying habitat (heathland) within 200m of the A3 (the key route for vehicles). However, this has not been determined for the A219 (which is less likely to routinely carry traffic associated with the local plan), whereby a small area of qualifying habitat is present within 200m of this strategic road network.

9.2.5 The London Plan forms the statutory development plan for London and helps guide planning decisions, with Borough's within London requiring to be in line with the London Policies to ensure that the planning system across the whole of London reflects the overall strategy for how London can develop sustainably.

9.2.6 Of relevance to the Draft London Plan[50] (which is currently out for consultation), are the policies set out around measures to improve vehicle emissions and air quality across London. This includes Policy GHR10, which places a requirement on all Local Plans to address air quality and aims to ensure new developments help improve local air quality, reduce the extent to which Londoners are exposed to risks associated with air pollution and poor air quality and work towards meeting the World Health Organizations (WHO's) air-quality guidelines. Whilst this policy is primarily focussed towards improving air quality from a public health perspective, these improvements will also achieve a positive effect to Habitats sites that are sensitive to changes in air quality.

9.2.7 The HRA for the draft London Plan states as part of the appropriate assessment addressing air quality impacts on Wimbledon Common SAC:

'Policies in the London Plan will implicitly improve air quality through focus on public transport and support for electric vehicles amongst others. Together with the actions in the London Environment Strategy, these demonstrate a strong commitment to improve air quality within the Greater London Authority boundary.'

'Policies in the Draft London Plan will implicitly improve air quality through requirements to support public transport and support for electric vehicles (which appear in a number of policies) as well as more directly through policy GHR10 Air Quality'.

[48] https://www.merton.gov.uk/planning-and-buildings/planning/local-plan. Accessed September 2026

[49] https://www.wandsworth.gov.uk/planning/planning-policy/local-plan/the-adopted-local-plan/. Accessed September 2026.

[50] https://www.london.gov.uk/programmes-strategies/planning/london-plan/next-london-plan/draft-london-plan-consultation/draft-london-plan-consultation-resources/draft-london-plan. Accessed September 2026.

'Together with the actions in the London Environment Strategy, these demonstrate a strong commitment to improve air quality within the Greater London Authority boundary. Whilst it is noted that the aim is in general to improve air quality from a public health perspective, any improvement in air quality will have a positive knock-on-effect to Habitats designated sites that are sensitive to atmospheric pollution'.

'Overall, the Mayor's air quality policies in the Draft London Plan, The Mayor's Transport Strategy and the London Environment Strategy will improve air quality in London considerably over the plan period and beyond even allowing for growth in population and jobs'.

9.2.8 Finally, it concludes with regards to air quality related impacts arising from the Draft London Plan:

'Following Appropriate Assessment, it was determined that there are no adverse effects on integrity of Wimbledon Common SAC due to the overarching measures to improve vehicle emissions being undertaken by Transport for London and the Mayor of London and policy GHR10 (Air Quality) which in point A(3) requires local authorities in their plan-making to use the latest available evidence to 'inform site allocations and area-based approaches in order to plan for air quality improvements and exposure reduction at a neighbourhood scale in a way that integrate on and off-site measures and with Air Quality Action Plans'.

9.2.9 With reference to GHR10 A (3), it is understood that air quality modelling exercises are being undertaken for Wimbledon Common SAC, the results of which can be used to inform local authority plan making, however this data is not currently available.

9.2.10 Although the results of this air quality modelling are not available, in order to inform the RBKT Local Plan, a number of HRA's are available from neighbouring Boroughs that are currently going through updates to their Local Plans, or have had their Local Plans adopted within the past two years and which provide relevant information through either air quality assessments (supported by traffic modelling), and / or an in-combination assessment with RBKT planned growth. The conclusions for all where a HRA is available on the evidence database state that there will be no adverse effects on the integrity of Habitats sites, either alone or in-combination with other plans / projects. This includes Merton and Wandsworth (within which Wimbledon Common SAC is situated), as well as for Richmond Upon Thames, where detailed traffic modelling and air quality assessment was undertaken to inform the assessment.

9.2.11 With regards local plan policies specific to RBKT, Policy KC2 ensures that all major and large-scale developments should take an 'Air Quality Positive' approach, with all development meeting or exceeding the 'Air Quality Neutral Standard' and accord with the RBKT's Air Quality Action Plan.

9.2.12 Specifically, Policy KT2 sets out *inter alia* the following requirements with regards to new development within the RBKT:

- *'An Air Quality Neutral Assessment will be required to accompany all major development applications and applications within the Air Quality Focus Area (in central Kingston and on the A3 in New Malden/West Barnes). This assessment should demonstrate how the development proposal will meet or exceed the air quality benchmarks in the GLA's Air Quality Neutral LPG.';*

- *'Large-scale development proposals, subject to an Environmental Impact Assessment, should be accompanied by an Air Quality Positive Statement outlining the Air Quality Positive Approach taken'; and*

- *Air quality assessments will be required for:*
  i) major developments
  ii) all residential developments within the Air Quality Focus Areas

9.2.13 Additionally, there are a further three policies within the RBKT Local Plan that seek to encourage the use of public transport and sustainable transport modes. Policy KT2 prioritises and encourages the use of public and active transport modes and discourages car use within the Borough. It includes the improvement of safety, particularly with regard to cyclists and cycle facilities. Policy KT3 encourages the use of sustainable transportation modes, including cycling and electric vehicles, and aims to promote public transport use where possible and aims to maintain and restrict new car parking developments, whilst Policy KT4 encourages the use of sustainable vehicles, such as low emissions vehicles, electric vehicles and bikes.

9.2.14 Policy KN3 (Biodiversity) states '...*Biodiversity and natural capital must be protected, enhanced, extended and connected*'. Whilst this policy doesn't specifically reference the need for undertaking a HRA, part D of this policy states:

'Ecological Impact Assessment should be submitted for all planning applications for major development and proposals that may harm or impact biodiversity. Additional Species-Specific Surveys may be required for proposals affecting species of particular concern in the area'.

It is therefore assumed, that in order for an Ecological Impact Assessment to be prepared and supported by sufficient robust information, where required, a HRA would form part of this assessment. Furthermore, Paragraph 193 (a) of the NPPF (as detailed in Section 2.4) requires local panning authorities, to apply the following principles: '*if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused'.* Further, Policy 195 states: *The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.*

9.2.15 When taking into account the qualitative evidence, policy drivers (including London Plan and Local Plan policies, and the London Environment Strategy) the evidence points towards no impact pathway which could give rise to effects above a 'de minimis' threshold. Therefore, the conclusion of this Appropriate Assessment for the impact pathway of air quality on Wimbledon Common SAC is that an adverse effect of site integrity is not likely to occur when considered at a Plan level.

9.2.16 A Project-level HRA should be required where the assumptions set out in this assessment are deviated from and the policies within the Local Plan, as detailed above, in combination with the NPPF, provide sufficient drivers and safeguards to ensure this will happen.

Recreation and disturbance

9.2.17 Following Stage 1 HRA Screening, recreation and disturbance LSE as a result of the Local Plan were screened in for further assessment for Wimbledon Common SAC

9.2.18 Wimbledon Common SAC is situated to the north of the Borough, with all but one allocated site (SOB10) falling within 10km of the SAC, the closest being 0.43km away (KNK27).

9.2.19 As set out at the screening stage, it is considered proportionate for a 7km ZoI to be applied with regards to recreational pressure at this SAC. This however still includes all site allocations within the Borough, with the exception of five (SOB04, SOB06, SOB07, SOB09 and SOB10).

9.2.20 It has been identified within the SIP, that: *'High visitor use of the site causes damage to sensitive habitats, and results in adverse impacts such as compaction around the base of mature trees and removal of fallen timber'.*

Measures set out within the SIP to address this are as follows:

- *'Review the management plan to ensure that visitor pressure is addressed'; and*
- *'Implement measures to reduce impacts arising from public access and use of the site'.*

9.2.21 Wimbledon Common SAC comprises five SSSI units of Wimbledon Common SSSI (Units 1, 2, 6, 8 and 9). Units 1, 2, 6 and 8 are all recorded as 'Unfavourable – Recovering, whilst Unit 9 is recorded as 'Unfavourable – no change'.

9.2.22 Further detail of the condition assessment[51] identified a range of reasons for the resulting condition of the units, with only Unit 6 referencing recreational pressures as a concern with the following cited in the comments:

[51] Condition of SSSI Units for Site Wimbledon Common SSSI. Available at: https://designatedsites.naturalengland.org.uk/ReportUnitCondition.aspx?SiteCode=S1004317&ReportTitle=Wimbledon%20Common%20SSSI. Accessed August 2026.

'The sward appears to be suffering from its use as a golf course-this could be through high footfall but also possibly through rolling and fertiliser spread- and management or use of the areas of acid grassland really needs to become less intensive to improve the condition'

'In areas of heavy recreational use soil compaction is preventing regeneration'.

9.2.23 For Units 1 and 2, it was noted that '*There are no indications of significant damaging impacts arising from non-native species, drainage, trampling, burning or disturbance'*, whilst Unit 9 states '*rough areas did not seem to be suffering from significant over management/ high footfall'*. No reference was made with regards recreational disturbance at Unit 8.

9.2.24 The Wimbledon and Putney Commons Conservators, who are responsible for the management of the SAC, produced a management strategy[52] in 2017 to ensure that the site is conserved, enhanced and protected, whilst remaining available for the public to have use for exercise and recreation purposes.

9.2.25 As part of the management strategy, it was proposed to '*Prepare a Land Management Plan to support the on-going management of the Commons and to enhance specific habitats (heathlands/woodlands/ meadows & aquatic)'.* To '*balance the interest of the ecological value/landscape characters and recreational use of the Commons'* it was proposed to '*protect sensitive habitats, through careful management techniques including dead hedging and judicious planting'*. The purpose of this to is to help create physical barriers between the sensitive habitats where there are nearby formal pathways, therefore reducing the likelihood of damage as a result of trampling.

9.2.26 Furthermore, an annual Ecological and Environmental Monitoring Report for the site was prepared in 2019[53]. This report highlighted on-going management works being undertaken to restore heathland via various means, including tree thinning, scrub, gorse and bracken control and maintenance of fire breaks. The report did however highlight that due to the urban setting of the SAC, recreational pressures including arson, disturbance, dog fouling and air pollution were impacting the habitat. Annual monitoring reports have continued to be produced since this 2019 report[54], however the format of the reports has altered slightly and are more focussed on wildlife monitoring across Wimbledon and Putney Commons, with less focus on the management activities.

[52] A Strategy for Wimbledon and Putney Commons. Available at: https://www.wpcc.org.uk/downloads/publications/commons-strategy-2017-to-2019.pdd. Accessed August 2026.
[53] Wimbledon and Putney Commons Ecological and Environmental Monitoring Report 2019. Available at: https://www.wpcc.org.uk/downloads/nature/ecological-and-environmental-report-2019-(final).pdf. Accessed September 2026.
[54] https://www.wpcc.org.uk/nature/ecological-and-environmental-monitoring-reports

9.2.27 A progress report[55] on the progress on the Key Initiatives 2024-2027 of the strategy was prepared in 2024. This document outlined that '*The Commons Land Management Plan (LMP) has been completed and now needs adequate resourcing to implement'*.

9.2.28 A draft version of the LMP[56] is available, which sets out the proposed management of the SAC for 2024-2034. This is an extensive document setting out the required management in order to protect the sensitive habitats and species for which the SAC is designated for, as well as measures to be implemented to increase the SSSI units to a 'favourable' condition. Within the LMP, annual monitoring has been committed to, in order to check progress against the actions set out within the plan.

9.2.29 Providing that the habitat management measures set out within the draft LMP are implemented, and the monitoring is undertaken on an annual basis, with any changes required to the management identified and implemented, this will help to reduce and manage the impact of recreational pressure on the SAC that may result from an increase in visitors arising from the site allocations within the Local Plan.

9.2.30 With regards the local plan policies, Policy KN2 Open Spaces outlines the requirements for proposed developments to improve access and provide adequate provision of parks and open spaces within the local area. Additionally, the development of new open spaces within major proposed developments will also improve access and provide accessible green spaces for new residents.

9.2.31 Although the condition assessment for Unit 6 of Wimbledon Common SSSI has referenced recreation as a concern, this is largely due to this unit comprising a golf course whereby high footfall is expected. The main habitat type within this unit comprises acid grassland, with broadleaved, mixed and yew woodland. Whilst the woodland is supporting habitat for stag beetle, there is no heathland habitat present, for which the SAC is designated for.

9.2.32 When taking into account the above, and specifically the measures set out within the LMP and policy KM2, it is therefore considered, no adverse effects on the integrity of Wimbledon Common SAC will occur as a result of recreational pressures, both alone and in-combination with other Local Plans and policies.

[55] Wimbledon and Putney Commons. Progress report on key initiatives In Business Plan 2024-2027. Available here: https://www.wpcc.org.uk/downloads/business-plan-key-initiatives/wpcc-progress-report-on-key-initiatives-2023-to-2026.pdfwpcc-progress-report-on-key-initiatives-2024-to-2027.pdf. Accessed August 2026.
[56] Conserving the Commons A Land Management Plan for Wimbledon and Putney Commons 2024 to 2034. Available here: https://www.wpcc.org.uk/downloads/land-management-plan/land-management-plan-final---february-2024-final-for-website.pdf. Accessed August 2026.

10 Conclusions

10.1.1 This document provides guidance on the likely data sources, information requirements and the process of HRA Screening and other stages of assessment as necessary. It also provides a discussion of where the ecological implications of the RBKT Local Plan will lie as the plan emerges and which Habitats sites are vulnerable to known pressures, threats and existing impacts.

10.1.2 There are no Habitats sites within RBKT's administrative area, however there are a number that fall within 10km (i.e. the identified ZoI) of the allocated sites and as such there will be implications for some of these Habitats sites from the policies of the Local Plan. The identified sites comprised Wimbledon Common SAC, Richmond Park SAC, South West London Waterbodies SPA and Ramsar site, Thames Basin Heaths SPA and Mole Gap to Reigate Escarpment SAC.

10.1.3 At the screening stage, LSE was considered for five key factors: air quality, recreational pressure, hydrological changes, urbanisation and impacts to FLL.

10.1.4 All but five policies have been screened-out due to their nugatory or beneficial effects on Habitats sites, but five policies were screened-in (K2 – Locations for Sustainable Development, K3 – Key Areas of Change, KH1 – Meeting the Borough's Housing Needs, KN2 Open Spaces and KS3 School, College and University Facilities) as well as a number of site allocations due to their proximity to the Habitats Sites for their further consideration at Stage 2 Appropriate Assessment. These policies and site allocations were assessed to have potential for LSE on Wimbledon Common SAC relating to increased traffic (and therefore impacts on air quality) and increased public access, recreational and development pressures.

10.1.5 For all other Habitats Sites (Richmond Park SAC, South West London Waterbodies SPA and Ramsar site, Thames Basin Heaths SPA and Mole Gap to Reigate Escarpment SAC) LSE were screened out and therefore consideration at Appropriate Assessment was not required.

10.1.6 At Stage 2 Appropriate Assessment, further site-specific assessment was carried out relating to air quality and recreational impacts arising from the above listed policies and allocations upon Wimbledon Common SAC.

10.1.7 Air quality considerations at Appropriate Assessment for Wimbledon Common SAC concluded that an adverse effect on site integrity is not likely to occur when considered at a Plan level. This is on the basis of the qualitative evidence (including the Draft London Plan, the London Environment Strategy and the RBKT Local Plan policies) which point towards no impact pathway which could give rise to effects above a 'de minimis' threshold.

10.1.8 Recreational disturbance considerations at Appropriate Assessment for Wimbledon Common concluded no adverse effects on the integrity of Wimbledon Common SAC will

occur as a result of recreational pressures, both alone and in-combination with other Local Plans and policies. This conclusion was on the basis of the measures set out within the Wimbledon and Putney Commons Land Management Plan, and policy KM2 of the RBKT Local Plan, as well as following a review of the condition assessments associated with the SSSI units for Wimbledon Common, that underpin this SAC.

10.1.9 Should separate plans or projects come forwards which deviate from the assumptions set out here in this Plan-level HRA, a Project -level HRA should be undertaken to confirm that the conclusions set out here remain accurate and address any additional avoidance or mitigation measures, as necessary.

Appendix A

LEGISLATIVE BACKGROUND, POLICY CONTEXT AND CEJU RULINGS

Legislative background

Refer to Section 2.1.2 above for arrangement post Brexit.

The Conservation of Habitats and Species Regulations (2017, as amended) (the 'Habitats Regulations') protects habitats and species of Habitats sites. The Habitats Regulations establishes a network of internationally important sites designated for their ecological status. SACs are designated under the Habitats Regulations and promote the protection of flora, fauna and habitats. SPAs are designated in order to protect vulnerable and migratory bird species. These sites combine to create a Europe-wide 'Natura 2000' network of designated sites.

Under the Habitats Regulations 'Competent Authorities' must assess Plans, in this case the LTP and associated plans, for their potential to cause Likely Significant Effects (LSE) on Habitats sites. Where the Plan may lead to LSE it must be subject to an HRA to determine whether there will be adverse effects to any Habitats sites. Any Plan that would lead to adverse effects on the integrity of Habitats site(s) cannot be permitted without meeting strict additional tests.

According to the Habitats Regulations, any plan or project likely to have a significant effect on a Habitats site, either individually or in-combination with other plans or projects should undergo an appropriate assessment to determine its implications for the site. The Competent Authority can only agree to the plan or project after having ascertained that it will not adversely affect the integrity of the site concerned.

The purpose of the Habitats sites network is preservation of examples of species and habitats across the UK and Europe, rather than preservation of individual sites. In exceptional circumstances, a plan or project may still be allowed to go ahead, in spite of a negative assessment, provided there are no alternative solutions and the plan or project is considered to be of overriding public interest[57]. In such cases the UK Government must take appropriate compensatory measures to ensure that the overall coherence of the Natura 2000 Network is protected.

Regulation 63 (1) of the Habitats Regulations states that '…a Competent Authority, before deciding to undertake, or give any consent, permission or other authorisation for, a plan or project which—

[57] An exact definition of 'imperative reasons of overriding public interest' is not provided, but EC guidance states
'It is reasonable to consider that the "imperative reasons of overriding public interest, including those of social and economic nature" refer to situations where plans or projects envisaged prove to be indispensable:
- within the framework of actions or policies aiming to protect fundamental values for the citizens' life (health, safety, environment);
- within the framework of fundamental policies for the State and the Society;
- within the framework of carrying out activities of economic or social nature, fulfilling specific obligations of public service.'

(a) is likely to have a significant effect on a Habitats site or a European offshore marine site (either alone or in combination with other plans or projects), and

(b) is not directly connected with or necessary to the management of that site,

—must make an appropriate assessment of the implications for that site in view of that site's conservation objectives.'

The Habitats Regulations also make allowance for projects or plans to be completed if they satisfy 'imperative reasons of overriding public interest'[58]. Regulation 64 relates to such situations.

The requirements of the Habitats Regulations are usually met by undertaking an initial two-stage approach; Stage 1 screening of potential LSEs on the qualifying features and conservation objectives of Habitats sites, and then, for those Habitats sites where this applies, a Stage 2 'Appropriate Assessment' of the adverse effects on the integrity of those Habitats sites of the LTP policies.

It should be noted that the competent authority (RBKT council) undertakes the Screening and Appropriate Assessment, the consultant provides the information or evidence-base to allow this to be completed. The competent authority must include consideration of 'in-combination' effects arising from other projects and plans within their assessment, as well as those potentially acting alone. Given the scale of the HRA the in-combination exercise will likely consider in-County, as well as outside-County interactions with Habitats sites.

[58] '*(a) reasons relating to human health, public safety or beneficial consequences of primary importance to the environment; or. (b) any other reasons which the Competent Authority, having due regard to the opinion of the Commission, consider to be imperative reasons of overriding public interest.'*

The Council for Justice of the European Union (CJEU) rulings

A number of CJEU rulings are relevant to the HRA screening exercise and are noted below. At the present time the position, under section 6(3) EU (Withdrawal) Act 2018 (as amended), is that the courts in the UK, with the sole exception of the Supreme Court, will continue to be bound by HRA judgments handed down by the CJEU and by domestic courts prior to 31 December 2020 when interpreting the Conservation of Habitats and Species Regulations 2017 (as amended). This is the case as long as the Conservation of Habitats and Species Regulations 2017 (as amended) remain unmodified by Parliament. The Supreme Court will, however, be at liberty to depart from these judgments after 31 December 2020 if they consider it appropriate to do so.[59]

The Wealden Judgement

The Wealden Judgement[60], handed down in March 2017, has introduced additional complexities into the assessment process in relation to in-combination and cumulative effects.

Prior to this Judgement, air quality impacts on Habitats sites were only considered alongside roads where the traffic growth associated with the individual Plan or Project being assessed exceeded specified screening criteria. These criteria were typically based on changes in vehicle movements and taken from the Design Manual for Roads and Bridges (DMRB, HA207/07[61]), which has been subsequently withdrawn namely:

- increases of 1000 vehicles per day or 200 Heavy Goods Vehicles per day (as Annual Average Daily Traffic (AADT)).

The Wealden Judgement found that the application of the criteria to the traffic growth associated with a single Local Plan was unsound on the basis that two Local Plans collectively contributing more than 1000 AADT could lead to a potentially significant effect. The Judge determined that further assessment of air quality impacts on Habitats sites should have been carried out and quashed part of the Local Plan that would have led to an in-combination exceedance of 1,000 AADT.

The Wealden Judgement means that every single plan or project which, alone, is predicted to give rise to any increase in traffic or other air emission (however small) must be subjected to an in-combination assessment with other plans or projects (which would include those plans or projects

[59] Freeths Habitats Regulations update 2020. Available at: https://communications.freeths.co.uk/44/1637/october-2020/the-habitats-regulations-assessment-regime-after-31-december-2020---how-will-it-look-.asp?sid=8bf6fad5-597a-43c6-8f70-61503ec0adb9
[60] Judgment in Wealden District Council v. Secretary of State for Communities and Local Government, Lewes District Council and South Downs National Park Authority [2017] EWHC 351 (Admin) DATE: 21 Mar 2017.
[61] *Design Manual for Roads and Bridges (DMRB), Volume 11, Section 3, Part 1 (HA207/07).* Withdrawn, but available online: https://standardsforhighways.co.uk/dmrb/archive/search/df0c77ed-887b-4c84-be0e-000fe18545ae Accessed [31/03/2022]

with a similar tiny impact). However, the judgement did not rule out the application of thresholds in principal and this approach is normally taken as the basis of the assessment.

The judgement has led to a more detailed analysis of three key questions to discern which plans and project are those where a detailed "in combination" assessment is required in relation to changes in air quality:

1. Is your plan or project putting emissions into the air?;

2. If so, are those emissions at a level where they could actually be measured / perceived?; and

3. If so, is there a realistic (rather than hypothetical) risk that those emissions, alone, will have an adverse effect on the ecology of a SAC / SPA?

A fuller justification will be required when applying the threshold approach.

People over Wind (The Sweetman Case)

The Court of Justice of the European Union's (CJEU's) decision in the matter of People Over Wind and Sweetman v Coillte Teoranta (C-323/17)[62] (hereafter referred to as the 'Sweetman Case'), states that:

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

In the new judgement the CJEU concluded that mitigation measures could not be considered as part of the project, and thus that the screening stage of HRA should not take account of them. This will undoubtedly be tested further in the courts in coming months and years, but the key issue is whether the mitigation measures proposed can genuinely be considered as part of the project, in that they would happen in any case, irrespective of the Habitats site. If not, then they should be considered mitigation measures, and considered at the Appropriate Assessment stage of HRA.

This is an emerging issue for local authorities and means that, because of the potential for 'in-combination effects and the fact that HRA Screening should not take into account measures targeted at mitigating effects on Habitats sites. Therefore, it is becoming increasingly commonplace for local authorities to conduct an Appropriate Assessment of all project, plans and planning applications (i.e. these are often no longer screened out, by way of an HRA Screening as has been the practise to date).

[62] Judgement of the Court 12 April 2018, People Over Wind, Peter Sweetman, Coillte Teoranta Available online: https://curia.europa.eu/juris/document/document.jsf;jsessionid=B02FE6F4F1C61308615DBBDF079EE5F4?text=&docid=200970&pageIndex=0&doclang=en&mode=lst&dir=&occ=first&part=1&cid=11190634 Accessed [27/04/2022]

CJEU Ruling in the Netherlands nitrogen and agriculture cases c-293/17 and c-294/17

The final Court Judgement in relation to these two cases was handed down on the 7th November 2018. The judgement relates to the assessment of agricultural activities under the Habitats Regulations, but has potential implications for the assessment of changes in nitrogen (N) deposition in relation to air quality. Notably, the Court of Justice of the European Union ruled that:

- An 'appropriate assessment' may only take into account the existence of Article 6(1) 'conservation measures', or Article 6(2) 'preventive measures', or specific measures adopted for a conservation programme, or 'autonomous' measures not in the programme, if the expected benefits of those measures are certain at the time of the assessment.
- National measures such as procedures for the surveillance and monitoring of farms whose activities cause nitrogen deposition and the possibility of imposing penalties, up to and including the closure of those farms, are sufficient for the purposes of complying with Article 6(2).

Of particular relevance to the assessment of air quality effects on Habitats sites, the Court of Justice of the European Union ruled that:

"An 'appropriate assessment' may only take into account the existence of Article 6(1) 'conservation measures', or Article 6(2) 'preventive measures', or specific measures adopted for a conservation programme, or 'autonomous' measures not in the programme, if the expected benefits of those measures are certain at the time of the assessment.

The Ruling makes clear that certainty and a thorough and in-depth examination of the scientific soundness is required that that there is no reasonable scientific doubt as to the absence of adverse effects of each plan or project on the integrity of the site concerned.

Kokott Ruling

In the Opinion of Advocate General Kokott in Case C-6/04 Commission v UK [2005] ECR I-9017 at paragraph 49 she noted that an assessment of plans cannot by definition take into account all effects because

"Many details are regularly not settled until the time of the final permission" and "[i]t would also hardly be proper to require a greater level of detail in preceding plans or the abolition of multi-stage planning and approval procedures so that the assessment of implications can be concentrated on one point in the procedure. Rather, adverse effects on areas of conservation must be assessed at every relevant stage of the procedure to the extent possible on the basis of the precision of the plan. This assessment is to be updated with increasing specificity in subsequent stages of the procedure".

Appendix B

HABITATS SITES DETAILS, INCLUDING QUALIFYING FEATURES AND CONSERVATION OBJECTIVES

Site Name	Site Size (Ha)	Summary of reasons for designation summarised on Natura 2000 Standard Data Form or Ramsar Information Sheet	Activities with greatest effect upon the site, as listed on Natura 2000 standard data forms and Information Sheets for Ramsar Wetlands	Pressures and threats listed within the Site Improvement Plan (NE, undated) (T=Threat, P=Pressure)	Conservation Objectives
Richmond Park SAC	846.3	**Annex II species that are a primary reason for selection of this site** ▪ 1083 Stag beetle *Lucanus cervus* Richmond Park has a large number of ancient trees with decaying timber. It is at the heart of the south London centre of distribution for stag beetle *Lucanus cervus* and is a site of national importance for the conservation of the fauna of invertebrates associated with the decaying timber of ancient trees.	▪ No threats listed[63]	▪ No current issues affecting the Natura 2000 feature(s) have been identified on this site [64]	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; ▪ The extent and distribution of the habitats of qualifying species ▪ The structure and function of the habitats of qualifying species ▪ The supporting processes on which the habitats of qualifying species rely ▪ The populations of qualifying species, and, ▪ The distribution of qualifying species within the site.[65]
South West London Waterbodies Ramsar site	828.1	**Ramsar criterion 6 –** species/populations occurring at levels of international importance. Qualifying Species/populations (as identified at designation): Species with peak counts in spring/autumn: ▪ Northern shoveler *Anas clypeata* (NW and C Europe) - 397 individuals, representing an average of 2.6% of the GB population (5-year peak mean 1998/9-2002/3) Species with peak counts in winter: ▪ Gadwall *Anas strepera strepera* (NW Europe) - 487 individuals, representing an average of 2.8% of the GB population (5-year peak mean 1998/9- 2002/3)	▪ No factors reported[66]	There are no factors listed adversely affecting the site's ecological character from the RIS for the Ramsar site	No conservation objectives specifically for Ramsar sites but informally taken to be the same as the overlapping SPA.
South West London Waterbodies SPA	825.1	**ARTICLE 4.2 QUALIFICATION (79/409/EEC)** **Over winter the area regularly supports:** ▪ Shoveler *Anas clypeata* (North-western/Central Europe) - 2.1% of the population (Five-year peak mean for 1993/94 to 1997/98)	▪ I02 - Problematic native species ▪ K01 - Abiotic (slow) natural processes ▪ M02 - Changes in biotic conditions	▪ P/T – Public access/ disturbance ▪ P/T – Changes in species distributions ▪ P/T – Invasive species	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

[63] Richmond Park SAC Natura 2000 form. Available at: https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0030246.pdf (Accessed on: 26/01/2021)
[64] Richmond Park Site Improvement Plan. Available at: http://publications.naturalengland.org.uk/file/4641498714865664 (Accessed on 26/01/2021)
[65] Richmond Park SAC Conservation Objectives. Available at: http://publications.naturalengland.org.uk/file/5521612917178368 (Accessed on: 26/01/2021)
[66] South West London Waterbodies Ramsar Natura 2000 form. Available at: https://jncc.gov.uk/jncc-assets/RIS/UK11065.pdf (Accessed on: 26/01/2021)

Site Name	Site Size (Ha)	Summary of reasons for designation summarised on Natura 2000 Standard Data Form or Ramsar Information Sheet	Activities with greatest effect upon the site, as listed on Natura 2000 standard data forms and Information Sheets for Ramsar Wetlands	Pressures and threats listed within the Site Improvement Plan (NE, undated) (T=Threat, P=Pressure)	Conservation Objectives
		▪ Gadwall *Anas strepera* (North-western Europe) - 2.4% of the population (Five-year peak mean for 1993/94 to 1997/98)	▪ G01 - Outdoor sports and leisure activities, recreational activities ▪ F01 - Marine and Freshwater Aquaculture[67]	▪ P/T Natural changes to site conditions ▪ P – Fisheries: Fish stocking ▪ T – Inappropriate weed control[68]	▪ The extent and distribution of the habitats of the qualifying features ▪ The structure and function of the habitats of the qualifying features ▪ The supporting processes on which the habitats of the qualifying features rely ▪ The population of each of the qualifying features, and, ▪ The distribution of the qualifying features within the site.[69]
Wimbledon Common SAC	51.4	**Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site** ▪ 4010 Northern Atlantic wet heaths with *Erica tetralix* ▪ 4030 European dry heaths **Annex II species that are a primary reason for selection of this site** ▪ 1083 Stag beetle *Lucanus cervus* Wimbledon Common has a large number of old trees and much fallen decaying timber. It is at the heart of the south London centre of distribution for stag beetle *Lucanus cervus*, and a relatively large number of records were received from this site during a recent nationwide survey for the species. The site supports a number of other scarce invertebrate species associated with decaying timber.	▪ J03 - Other ecosystem modifications ▪ I01 – Invasive non-native species ▪ B02 – Forest and Plantation management and use ▪ H04 – Air pollution, air-borne pollutants[70]	▪ P– Public disturbance ▪ T – Invasive species ▪ T – Habitat fragmentation ▪ P – Air Pollution: impact of atmospheric nitrogen deposition[71]	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; ▪ The extent and distribution of qualifying natural habitats and habitats of qualifying ▪ species ▪ The structure and function (including typical species) of qualifying natural habitats ▪ The structure and function of the habitats of qualifying species ▪ The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely ▪ The populations of qualifying species, and, ▪ The distribution of qualifying species within the site.[72]
Thames Basin Heaths SPA	8311.1	**ARTICLE 4.2 QUALIFICATION (79/409/EEC)** Supports breeding populations of: ▪ Nightjar *Caprimulgus europaeus*- 264 churring males, 7.8% of GB population (1998/1999) ▪ Woodlark *Lullula arborea*- 149 pairs, 9.9% of GB population (1997) ▪ Dartford warbler *Sylvia undata*- 445 pairs, 27.8% of GB population (1999)	▪ G05 - Other human intrusions and disturbances ▪ B02 - Forest and Plantation management & use ▪ K02 - Biocenotic evolution, succession ▪ G01 - Outdoor sports and leisure activities, recreational activities	▪ P/T – Public access/ disturbance ▪ P – Undergrazing ▪ P - Forestry and woodland management ▪ T – Hydrological changes ▪ P – Inappropriate scrub control ▪ P/T - Invasive species ▪ P - Wildfire/ arson	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring; ▪ The extent and distribution of the habitats of the qualifying features ▪ The structure and function of the habitats of the qualifying features

[67] South West London Waterbodies SPA Natura 2000 form. Available at: https://jncc.gov.uk/jncc-assets/SPA-N2K/UK9012171.pdf (Accessed on:26/01/2021)
[68] South West London Waterbodies SPA Site Improvement Plan. Available at: http://publications.naturalengland.org.uk/file/5135484288237568 (Accessed on: 13/08/2026)
[69] South West London Waterbodies SPAConservation Objectives. Available at: http://publications.naturalengland.org.uk/file/5411059804667904 (Accessed on: 26/01/2021)
[70] Wimbledon Common SAC Natura 2000 form. Available at: https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0030301.pdf (Accessed on: 26/01/2021)
[71] Wimbledon Common SAC Site Improvement Plan. Available at: http://publications.naturalengland.org.uk/file/5097829219434496 (Accessed on: 13/08/2026)
[72] Wimbledon Common SAC Conservation Objectives. Available at: http://publications.naturalengland.org.uk/file/6215672493506560 (Accessed on: 26/01/2021)

Site Name	Site Size (Ha)	Summary of reasons for designation summarised on Natura 2000 Standard Data Form or Ramsar Information Sheet	Activities with greatest effect upon the site, as listed on Natura 2000 standard data forms and Information Sheets for Ramsar Wetlands	Pressures and threats listed within the Site Improvement Plan (NE, undated) (T=Threat, P=Pressure)	Conservation Objectives
		Non-qualifying species of interest: Hen harrier *Circus cyaneus*, merlin *Falco columbarius*, short-eared owl *Asio flammeus* and kingfisher *Alcedo atthis* (all Annex I species) occur in nonbreeding numbers of less than European importance (less than 1% of the GB population).	▪ H04 – Air pollution, air-borne pollutants[73]	▪ P/T – Air pollution: impact of atmospheric nitrogen deposition ▪ T – Feature location/ extent/ condition unknown ▪ T – Military ▪ P – Habitat fragmentation[74]	▪ The supporting processes on which the habitats of the qualifying features rely ▪ The population of each of the qualifying features, and, ▪ The distribution of the qualifying features within the site[75].
Mole Gap to Reigate Escarpment SAC	894.3	**Annex I habitats that are a primary reason for selection of this site** • 5110 Stable xerothermophilous formations with *Buxus sempervirens* on rock slopes (Berberidion p.p.) ▪ 6210 Semi-natural dry grasslands and scrubland facies on calcareous substrates (*Festuco-Brometalia*) (important orchid sites) ▪ 91J0 Taxus baccata woods of the British Isles (Priority feature) **Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site** ▪ 4030 European dry heaths ▪ 9130 Asperulo-Fagetum beech forests **Annex II species present as a qualifying feature, but not a primary reason for site selection** ▪ 1166 Great crested newt *Triturus cristatus* ▪ 1323 Bechstein's bat *Myotis bechsteinii* Mole Gap to Reigate Escarpment. contains woodland, chalk grassland, chalk scrub and heathland which form an interrelated mosaic.	▪ A02 - Modification of cultivation practices ▪ K02 - Biocenotic evolution, succession ▪ K04 - Interspecific floral relations ▪ H04 – Air pollution, air-borne pollutants[76]	▪ P/T - Disease ▪ P – Inappropriate scrub control ▪ T – Change in land management ▪ T– Public access/ disturbance[77]	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; ▪ The extent and distribution of qualifying natural habitats and habitats of qualifying species ▪ The structure and function (including typical species) of qualifying natural habitats ▪ The structure and function of the habitats of qualifying species ▪ The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely ▪ The populations of qualifying species, and, ▪ The distribution of qualifying species within the site.[78]

[73] Thames Basin Heaths SPA Natura 2000 form. Available at: https://jncc.gov.uk/jncc-assets/SPA-N2K/UK9012141.pdf (Accessed on: 26/01/2021)
[74] Thames Basin Heaths Site Improvement Plan. Available at: https://publications.naturalengland.org.uk/publication/6249258780983296 (Accessed on:13/08/2026)
[75] Thames Basin Heaths SPA Conservation Objectives. Available at: https://publications.naturalengland.org.uk/publication/4952859267301376 (Accessed on: 13/08/2026)
[76] Mole Gap to Reigate Escarpment SAC Natura 2000 form. Available at: https://sac.jncc.gov.uk/site/UK0012804 (Accessed on: 13/08/2026)
[77] Mole Gap to Reigate Escarpment SAC Site Improvement Plan. Available at: https://publications.naturalengland.org.uk/publication/5966636066537472?category=6149691318206464 (Accessed on: 13/08/2026)
[78] Mole Gap to Reigate Escarpment SAC Conservation Objectives. Available at: https://publications.naturalengland.org.uk/publication/4911739200077824 (Accessed on: 13/08/2026)

Appendix C

APIS INFORMATION FOR SPA AND SAC SITES WITHIN 10KM OF THE ALLOCATED SITES

Richmond Park SAC – Baseline atmospheric nutrient nitrogen and acid deposition (ref: APIS, September 2026)

Nutrient nitrogen

Site	Feature	Is Feature sensitive to N?	Feature's broad habitat	Is Feature's broad habitat sensitive to N? & Critical Load Class	N deposition rate Critical Load range (kg N/ha/yr)	Background N deposition rate (kg N/ha/yr)			Annual mean NH_3 Critical Level ($\mu g/m^3$)	Background annual mean NH_3 concentration ($\mu g/m^3$)			Annual mean NOx Critical Level ($\mu g/m^3$)	Background annual mean NOx concentration ($\mu g/m^3$)		
						Max	Min	Ave		Max	Min	Ave		Max	Min	Ave
Richmond Park SAC	*Lucanus cervus* - Stag beetle	No. No expected negative impact on species due to impacts on the species' broad habitat.	Broadleaved, mixed and yew woodland	Yes. Broadleaved deciduous woodland	10 - 15	**20.25**	**19.43**	**19.79**	3	1.17	1.032	1.10	30	25.09	21.01	22.39

Notes :
The background pollutant levels shown are modelled estimates and are the 3-year averages for the period 2022 – 2024 inclusive; they represent the baseline year of 2023.
The relevant Critical Level / Load is shown underlined.
Values shown in **bold** exceed the relevant Critical Level or lower value of the Critical Load range.
Reason for omitting sulphur dioxide (SO_2): Fuel quality legislation sets very low limits on the sulphur content of petrol and diesel. Road traffic is therefore a very minor source of SO_2 and any changes in road traffic emissions will have a negligible impact on ambient levels.
Where Critical Levels of ammonia are indicated as "1 or 3 $\mu g/m^3$" the decision must be made on a site specific basis.
Where a designated feature is recorded as "not sensitive due to nitrogen impact on the habitat", no further assessment is required of that species (at the identified life stage) unless a site-specific reason is identified by the decision maker or nature consultation body.

Acidity (nitrogen component)

Site	Feature	Is the Feature sensitive due to acidity impacts on broad habitat?	Feature's broad habitat	Is Feature sensitive to acidity? & Acidity Critical Load Class	Acid deposition rate Critical Load as min CL max N (keq N/ha/yr)	Background acid deposition rate (keq N/ha/yr)		
						Max	Min	Ave
Richmond Park SAC	*Lucanus cervus* - Stag beetle	No. No expected negative impact on species due to impacts on the species' broad habitat.	Broadleaved, mixed and yew woodland	Yes. Unmanaged Broadleafed / Coniferous Woodland	0.87	**1.56**	**1.49**	**1.52**

Notes :
The background pollutant levels shown are modelled estimates and are the 3-year averages for the period 2022 – 2024 inclusive; they represent the baseline year of 2023.
The relevant Critical Load is shown underlined.
Values shown in **bold** exceed the relevant Critical Level / Load.
Reason for omitting sulphur (S): Fuel quality legislation sets very low limits on the sulphur content of petrol and diesel. Road traffic is therefore a very minor source of S and any changes in road traffic emissions will have a negligible impact.
Where a designated feature is recorded as "not sensitive due to acidity impact on the habitat", no further assessment is required of that species (at the identified life stage) unless a site-specific reason is identified by the decision maker or nature consultation body.

Wimbledon Common SAC – Baseline atmospheric nutrient nitrogen and acid deposition (ref: APIS, September 2026)

Nutrient nitrogen (N)

Site	Feature	Is Feature sensitive to N?	Feature's broad habitat	Is Feature's broad habitat sensitive to N? & Critical Load Class	N deposition rate Critical Load range (kg N/ha/yr)	Background N deposition rate (kg N/ha/yr)			Annual mean NH_3 Critical Level ($\mu g/m^3$)	Background annual mean NH_3 concentration ($\mu g/m^3$)			Annual mean NOx Critical Level ($\mu g/m^3$)	Background annual mean NOx concentration ($\mu g/m^3$)		
						Max	Min	Ave		Max	Min	Ave		Max	Min	Ave
Wimbledon Common SAC	Northern Atlantic wet heaths with *Erica tetralix*	Yes	-	- Northern wet heath: 'L' Erica tetralix dominated wet heath (lowland)	5 - 15	**11.62**	**11.29**	**11.46**	1	**1.20**	**1.13**	**1.16**	30	25.42	21.55	23.12
	European dry heaths	Yes	-	- Dry heaths	5 - 15	**11.62**	**11.29**	**11.46**	1	**1.20**	**1.13**	**1.16**	30	25.42	21.55	23.12
	Lucanus cervus - Stag beetle	No. No expected negative impact on species due to impacts on the species' broad habitat.	Broadleaved, mixed and yew woodland	Yes. Broadleaved deciduous woodland	10 - 15	**20.36**	**19.76**	**20.03**	3	1.20	1.13	1.16	30	25.42	21.55	23.12

Notes :
The background pollutant levels shown are modelled estimates and are the 3-year averages for the period 2022 – 2024 inclusive; they represent the baseline year of 2023.
The relevant Critical Level / Load is shown underlined.
Values shown in **bold** exceed the relevant Critical Level or lower value of the Critical Load range.
Reason for omitting sulphur dioxide (SO_2): Fuel quality legislation sets very low limits on the sulphur content of petrol and diesel. Road traffic is therefore a very minor source of SO_2 and any changes in road traffic emissions will have a negligible impact on ambient levels.
Where Critical Levels of ammonia are indicated as "1 or 3 $\mu g/m^3$" the decision must be made on a site specific basis.
Where a designated feature is recorded as "not sensitive due to nitrogen impact on the habitat", no further assessment is required of that species (at the identified life stage) unless a site-specific reason is identified by the decision maker or nature consultation body.

Acidity (nitrogen component)

Site	Feature	Is the Feature sensitive due to acidity impacts on broad habitat?	Feature's broad habitat	Is Feature sensitive to acidity? & Acidity Critical Load Class	Acid deposition rate Critical Load as min CL max N (keq N/ha/yr)	Background acid deposition rate (keq N/ha/yr)		
						Max	Min	Ave
Wimbledon Common SAC	*Lucanus cervus* - Stag beetle	No. No expected negative impact on species due to impacts on the species' broad habitat.	Broadleaved, mixed and yew woodland	Yes. Unmanaged Broadleafed / Coniferous Woodland	1.01	**1.56**	**1.49**	**1.52**
	European dry heaths	-	Dwarf shrub heath	Yes. Dwarf shrub heath	0.87	**0.92**	**0.89**	**0.90**
	Northern Atlantic wet heaths with *Erica tetralix*	-	Dwarf shrub heath	Yes. Dwarf shrub heath	0.87	**0.92**	**0.89**	**0.90**

Notes :
The background pollutant levels shown are modelled estimates and are the 3-year averages for the period 2022 – 2024 inclusive; they represent the baseline year of 2023.
The relevant Critical Load is shown underlined.
Values shown in **bold** exceed the relevant Critical Level / Load.
Reason for omitting sulphur (S): Fuel quality legislation sets very low limits on the sulphur content of petrol and diesel. Road traffic is therefore a very minor source of S and any changes in road traffic emissions will have a negligible impact.
Where a designated feature is recorded as "not sensitive due to acidity impact on the habitat", no further assessment is required of that species (at the identified life stage) unless a site-specific reason is identified by the decision maker or nature consultation body.

Thames Basin Heaths SPA at M25 Junction 10 – Baseline background atmospheric nutrient nitrogen and acid deposition (ref: APIS, September 2026)

Nutrient nitrogen

Site	Feature	Is Feature sensitive to N?	Feature's broad habitat	Is Feature's broad habitat sensitive to N? & Critical Load Class	N deposition rate Critical Load range (kg N/ha/yr)	Background N deposition rate (kg N/ha/yr)			Annual mean NH_3 Critical Level ($\mu g/m^3$)	Background annual mean NH_3 concentration ($\mu g/m^3$)			Annual mean NOx Critical Level ($\mu g/m^3$)	Background annual mean NOx concentration ($\mu g/m^3$)		
						Max	Min	Ave		Max	Min	Ave		Max	Min	Ave
Thames Basin Heaths SPA at M25 J10 (grid squares 507500,157500 507500,158500 508500,157500 506500,158500 507500,159500 508500,158500 506500,159500 508500,159500 509500,158500)	*Caprimulgus europaeus* (European nightjar)	No. No expected negative impact on species due to impacts on the species' broad habitat.	Coniferous woodland	Yes	5 - 15	**17.41**	**17.03**	**17.26**	3	0.99	0.95	0.97	30	21.66	12.68	17.05
	Caprimulgus europaeus (European nightjar)	Yes. Potential negative impact on species due to impacts on the species' broad habitat.	Dwarf shrub heath	Yes	5 - 15	**10.16**	**9.95**	**10.07**	1	0.99	0.95	0.97	30	21.66	12.68	17.05
	Lullula arborea (Wood lark)	Yes. Potential negative impact on species due to impacts on the species' broad habitat.	Coniferous woodland	Yes	5 - 15	**17.41**	**17.03**	**17.26**	3	0.99	0.95	0.97	30	21.66	12.68	17.05
	Lullula arborea (Wood lark)	Yes. Potential negative impact on species due to impacts on the species' broad habitat.	Dwarf shrub heath	Yes	5 - 15	**10.16**	**9.95**	**10.07**	1	0.99	0.95	0.97	30	21.66	12.68	17.05
	Sylvia undata (Dartford warbler)	Yes. Potential negative impact on species due to impacts on the species' broad habitat.	Dwarf shrub heath	Yes	5 - 15	**10.16**	**9.95**	**10.07**	1	0.99	0.95	0.97	30	21.66	12.68	17.05

Notes :
The background pollutant levels shown are modelled estimates and are the 3-year averages for the period 2022 – 2024 inclusive; they represent the baseline year of 2023.
The relevant Critical Level / Load is shown underlined.
Values shown in **bold** exceed the relevant Critical Level or lower value of the Critical Load range.
Reason for omitting sulphur dioxide (SO_2): Fuel quality legislation sets very low limits on the sulphur content of petrol and diesel. Road traffic is therefore a very minor source of SO_2 and any changes in road traffic emissions will have a negligible impact on ambient levels.
Where Critical Levels of ammonia are indicated as "1 or 3 $\mu g/m^3$" the decision must be made on a site specific basis.

Site	Feature	Is Feature sensitive to N?	Feature's broad habitat	Is Feature's broad habitat sensitive to N? & Critical Load Class	N deposition rate Critical Load range (kg N/ha/yr)	Background N deposition rate (kg N/ha/yr)			Annual mean NH_3 Critical Level ($\mu g/m^3$)	Background annual mean NH_3 concentration ($\mu g/m^3$)			Annual mean NOx Critical Level ($\mu g/m^3$)	Background annual mean NOx concentration ($\mu g/m^3$)		
						Max	Min	Ave		Max	Min	Ave		Max	Min	Ave
Where a designated feature is recorded as "not sensitive due to nitrogen impact on the habitat", no further assessment is required of that species (at the identified life stage) unless a site-specific reason is identified by the decision maker or nature consultation body.																

Acidity (nitrogen component)

Site	Feature	Is the Feature sensitive due to acidity impacts on broad habitat?	Feature's broad habitat	Is Feature sensitive to acidity? & Acidity Critical Load Class	Acid deposition rate Critical Load as min CL max N (keq N/ha/yr)	Background acid deposition rate (keq N/ha/yr)		
						Max	Min	Ave
Thames Basin Heaths SPA at M25 J10 (grid squares 507500,157500 507500,158500 508500,157500 506500,158500 507500,159500 508500,158500 506500,159500 508500,159500 509500,158500)	*Caprimulgus europaeus* (European nightjar)	No. No expected negative impact on the species due to impacts on the species' broad habitat.	Dwarf shrub heath	Yes. Dwarf shrub heath	0.71	**1.31**	**1.27**	**1.29**
	Caprimulgus europaeus (European nightjar)	No. No expected negative impact on the species due to impacts on the species' broad habitat.	Unmanaged Broadleafed / Coniferous Woodland	Yes. Unmanaged Broadleafed / Coniferous Woodland	0.39	**1.31**	**1.27**	**1.29**
	Lullula arborea (Wood lark)	No. No expected negative impact on the species due to impacts on the species' broad habitat.	Dwarf shrub heath	Yes. Dwarf shrub heath	0.71	**1.31**	**1.27**	**1.29**
	Lullula arborea (Wood lark)	No. No expected negative impact on the species due to impacts on the species' broad habitat.	Unmanaged Broadleafed / Coniferous Woodland	Yes. Unmanaged Broadleafed / Coniferous Woodland	0.39	**1.31**	**1.27**	**1.29**
	Sylvia undata (Dartford warbler)	No. No expected negative impact on the species due to impacts on the species' broad habitat.	Dwarf shrub heath	Yes. Dwarf shrub heath	0.71	**1.31**	**1.27**	**1.29**

Notes :
The background pollutant levels shown are modelled estimates and are the 3-year averages for the period 2022 – 2024 inclusive; they represent the baseline year of 2023.
The relevant Critical Load is shown underlined.
Values shown in **bold** exceed the relevant Critical Level / Load.
Reason for omitting sulphur (S): Fuel quality legislation sets very low limits on the sulphur content of petrol and diesel. Road traffic is therefore a very minor source of S and any changes in road traffic emissions will have a negligible impact.
Where a designated feature is recorded as "not sensitive due to acidity impact on the habitat", no further assessment is required of that species (at the identified life stage) unless a site-specific reason is identified by the decision maker or nature consultation body.

Mole Gap to Reigate Escarpment SAC – Baseline background atmospheric nutrient nitrogen and acid deposition (ref: APIS, September 2026)

Nutrient nitrogen

Site	Feature	Is Feature sensitive to N?	Feature's broad habitat	Is Feature's broad habitat sensitive to N? & Critical Load Class	N deposition rate Critical Load range (kg N/ha/yr)	Background N deposition rate (kg N/ha/yr)			Annual mean NH_3 Critical Level ($\mu g/m^3$)	Background annual mean NH_3 concentration ($\mu g/m^3$)			Annual mean NOx Critical Level ($\mu g/m^3$)	Background annual mean NOx concentration ($\mu g/m^3$)		
						Max	Min	Ave		Max	Min	Ave		Max	Min	Ave
Mole Gap to Reigate Escarpment SAC	Asperulo-Fagetum (beech forests)	Yes	Broadleaved, mixed and yew woodland	Yes. Fagus forest on non-acid and acid soils	10 - 15	**20.69**	**19.46**	**20.29**	1 or 3	**1.17**	0.97	**1.06**	30	18.33	10.56	12.54
	European dry heaths (dry heaths)	Yes	Dwarf shrub heath	Yes. Dry heaths	5 - 15	**12.63**	**11.77**	**12.38**	1	**1.17**	0.97	**1.06**	30	18.33	10.56	12.54
	Juniperus communis formations on heaths or calcareous grasslands	Yes	Broadleaved, mixed and yew woodland	Yes. Dry heaths	5 - 15	**20.69**	**19.46**	**20.29**	1 or 3	**1.17**	0.97	**1.06**	30	18.33	10.56	12.54
	Juniperus communis formations on heaths or calcareous grasslands	Yes	Broadleaved, mixed and yew woodland	Yes. Semidry Perennial calc-areous grassland (basic meadow steppe).	10 – 20	**20.69**	**19.46**	**20.29**	1 or 3	**1.17**	0.97	**1.06**	30	18.33	10.56	12.54
	Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites)	Yes	Calcareous grassland	Yes. Semidry Perennial calc-areous grassland (basic meadow steppe).	10 - 20	**12.63**	**11.77**	**12.38**	1	**1.17**	0.97	**1.06**	30	18.33	10.56	12.54
	Stable xerothermo-philous formations with Buxus sempervirens on rock slopes (Berberidion pp)	Yes	Broadleaved, mixed and yew woodland	Yes. Semi-dry Perennial calc-areous grassland (basic meadow steppe).	10 – 20	**20.69**	**19.46**	**20.29**	1 or 3	**1.17**	0.97	**1.06**	30	18.33	10.56	12.54
	Taxus baccata woods of the British Isles	Yes	Coniferous woodland	Yes. Temperate mountain Picea forest, Temperate	10 – 15	**20.69**	**19.46**	**20.29**	3	1.17	0.97	1.06	30	18.33	10.56	12.54

Site	Feature	Is Feature sensitive to N?	Feature's broad habitat	Is Feature's broad habitat sensitive to N? & Critical Load Class	N deposition rate Critical Load range (kg N/ha/yr)	Background N deposition rate (kg N/ha/yr)			Annual mean NH_3 Critical Level ($\mu g/m^3$)	Background annual mean NH_3 concentration ($\mu g/m^3$)			Annual mean NOx Critical Level ($\mu g/m^3$)	Background annual mean NOx concentration ($\mu g/m^3$)		
						Max	Min	Ave		Max	Min	Ave		Max	Min	Ave
				mountain Abies forest												
	Myotis bechsteini (Bechstein`s bat)	Site specific. There is insufficient knowledge to make a judgment of the impacts on this species. Decision should be made at a site specific level.	Broadleaved, mixed and yew woodland	Yes. Broadleaved deciduous woodland.	10 - 15	**20.69**	**19.46**	**20.29**	Not sensitive	N/A	N/A	N/A	Not sensitive	N/A	N/A	N/A
	Rhinolophus ferrumequinum (Greater horseshoe bat)	Site specific. There is insufficient knowledge to make a judgment of the impacts on this species. Decision should be made at a site specific level.	Broadleaved, mixed and yew woodland	Yes. Broadleaved deciduous woodland.	10 - 15	**20.69**	**19.46**	**20.29**	Not sensitive	N/A	N/A	N/A	Not sensitive	N/A	N/A	N/A
	Rhinolophus ferrumequinum (Greater horseshoe bat)	No. No expected negative impact on species due to impacts on the species' broad habitat.	Improved grassland	No. Species' broad habitat not sensitive to eutrophication	-	N/A	N/A	N/A	Not sensitive	N/A	N/A	N/A	Not sensitive	N/A	N/A	N/A
	Triturus cristatus (Great crested newt)	Site specific. decision to be taken at a site specific level since habitat sensitivity depends on N or P limitation.	Standing open water and canals	Yes. No comparable habitat with established critical load estimate available	Not assigned	-	-	-	No critical level has been assigned for this feature, please seek site specific advice	1.17	0.97	1.06	Not relevant	N/A	N/A	N/A

Notes :
The background pollutant levels shown are modelled estimates and are the 3-year averages for the period 2022 – 2024 inclusive; they represent the baseline year of 2023.
The relevant Critical Level / Load is shown underlined.
Values shown in **bold** exceed the relevant Critical Level or lower value of the Critical Load range.
Reason for omitting sulphur dioxide (SO_2): Fuel quality legislation sets very low limits on the sulphur content of petrol and diesel. Road traffic is therefore a very minor source of SO_2 and any changes in road traffic emissions will have a negligible impact on ambient levels.
Where Critical Levels of ammonia are indicated as "1 or 3 $\mu g/m^3$" the decision must be made on a site specific basis.
Where a designated feature is recorded as "not sensitive due to nitrogen impact on the habitat", no further assessment is required of that species (at the identified life stage) unless a site-specific reason is identified by the decision maker or nature consultation body.

Acidity (nitrogen component)

Site	Feature	Is the Feature sensitive due to acidity impacts on broad habitat?	Feature's broad habitat	Is Feature sensitive to acidity? & Acidity Critical Load Class	Acid deposition rate Critical Load as min CL max N (keq N/ha/yr)	Background acid deposition rate (keq N/ha/yr)		
						Max	Min	Ave
Mole Gap to Reigate Escarpment SAC	Asperulo-Fagetum (beech forests)	-	Broadleaved, mixed and yew woodland	Yes. Unmanaged Broadleafed / Coniferous Woodland	1.623	1.56	1.44	1.50
	European dry heaths (dry heaths)	-	Dwarf shrub heath	Yes. Dwarf shrub heath	1.069	0.963	0.87	0.915
	Juniperus communis formations on heaths or calcareous grasslands,	-	Broadleaved, mixed and yew woodland	Yes. Calcareous grassland (using base cation)	4.856	1.56	1.44	1.50
	Juniperus communis formations on heaths or calcareous grasslands	-	Broadleaved, mixed and yew woodland	Yes. Dwarf shrub heath	1.069	0.963	0.87	0.915
	Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites)	-	Calcareous grassland	Yes. Calcareous grassland (using base cation)	4.856	1.56	1.44	1.50
	Stable xerothermo-philous formations with Buxus sempervirens on rock slopes (Berberidion pp),	-	Broadleaved, mixed and yew woodland	Yes. Calcareous grassland (using base cation)	4.856	1.56	1.44	1.50
	Taxus baccata woods of the British Isles	-	Coniferous woodland	Yes. Unmanaged Broadleafed / Coniferous Woodland	1.623	1.56	1.44	1.50
	Myotis bechsteini (Bechstein`s bat)	-	Broadleaved, mixed and yew woodland	Yes. Unmanaged Broadleafed / Coniferous Woodland	1.623	1.56	1.44	1.50
	Rhinolophus ferrumequinum (Greater horseshoe bat)	-	Broadleaved, mixed and yew woodland	Yes. Unmanaged Broadleafed / Coniferous Woodland	1.623	1.56	1.44	1.50
	Triturus cristatus (Great crested newt)	-	Standing open water and canals	Yes. Freshwater	Not assigned	-	-	-

Notes :
The background pollutant levels shown are modelled estimates and are the 3-year averages for the period 2022 – 2024 inclusive; they represent the baseline year of 2023.
The relevant Critical Load is shown underlined.
Values shown in **bold** exceed the relevant Critical Level / Load.
Reason for omitting sulphur (S): Fuel quality legislation sets very low limits on the sulphur content of petrol and diesel. Road traffic is therefore a very minor source of S and any changes in road traffic emissions will have a negligible impact.
Where a designated feature is recorded as "not sensitive due to acidity impact on the habitat", no further assessment is required of that species (at the identified life stage) unless a site-specific reason is identified by the decision maker or nature consultation body.

Appendix D

LOCAL PLAN TRANSPORT EVIDENCE ADVICE

Traffic data for Local Plan site allocations

	All Cars AADT			ICE Cars AADT (DfT TAG Scenario)			ZEV Cars AADT (DfT TAG Scenario)			ICE Cars AADT (DfT CAS VL Scenario)			ZEV Cars AADT (DfT CAS VL Scenario)		
Designated Site	**2032**	**2037**	**2042**	**2032**	**2037**	**2042**	**2032**	**2037**	**2042**	**2032**	**2037**	**2042**	**2032**	**2037**	**2042**
Richmond Park (in the general direction of Richmond Park SAC)	279	1309	2005	165	497	521	114	812	1484	136	311	186	143	999	1819
Wimbledon Common (in the general direction of Wimbledon Common SAC)	193	676	1022	114	257	266	79	419	756	94	160	95	99	516	927
Norbury Park, Headley Heath & Margery Wood (in the general direction of Mole Gap to Reigate Escarpment SAC)	813	2356	3462	480	895	900	333	1461	2562	396	559	321	416	1798	3141
Cobham (in the general direction of Thames Basin Heaths SPA)	746	2012	2786	440	765	724	306	1247	2062	364	477	258	382	1535	2528

Source: City Science (Transport Consultant for RBK)

THE ROYAL BOROUGH OF KINGSTON UPON THAMES

Royal Borough of Kingston Upon Thames

Local Plan Transport Evidence Advice

Trip Rate & Distribution Assessment

5th of August 2026

City Science®
Delivering decarbonisation

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Note Details

From	[redacted]
To	Names redacted
cc	
Date	05/08/26
Subject	Trip Rate & Distribution Assessment

1. Introduction

City Science and Fern Consulting were commissioned by the Royal Borough of Kingston (RBK) to provide support in relation to the preparation of the borough's emerging Local Plan ahead of Regulation 19 consultation. As part of this work, trip generation and distribution forecasts were prepared to estimate the travel demand associated with the proposed site allocations and to inform the wider technical evidence base, including an air quality assessment study being undertaken by another project.

The analysis combined TRICS trip rates, Census travel-to-work data and Transport for London's London Highway Assignment Model (LoHAM) to develop locally informed forecasts of travel demand and travel patterns. The approach comprised the following stages:

1. Derivation of trip rates using TRICS;
2. Review of trip rate mode shares against Census travel-to-work data;
3. Calculation of site-specific trip generation by mode;
4. Analysis of existing travel patterns;
5. Development of trip distribution factors;
6. Distribution of forecast vehicle trips across RBK and the wider area; and
7. Strategic review of forecast vehicle trips to support the air quality assessment.

This note sets out further details regarding the approach and findings, providing supporting analysis to help inform consideration of the transport implications of the proposed Local Plan site allocations. The accompanying data is provided in Excel format in Appendix A.

2. Trip Rate Generation

2.1 Site Categorisation

Given the diversity of the proposed Local Plan allocations, a single set of trip rates would not adequately reflect the differing accessibility and travel characteristics across the borough. To account for these variations, sites were grouped into three broad location categories based on their accessibility to public transport, proximity to key services and likely travel patterns. These categories formed the basis for the development of mode-specific trip rates and subsequent demand forecasts.

A review of the proposed site allocations found that approximately 47% were located within highly accessible urban centres, 35% within well-connected suburban locations and 18% within more peripheral areas where travel options are comparatively limited. The categories adopted for the assessment, together with the corresponding TRICS location types, are summarised in Table 2-1.

Table 2-1: Trip Rate Categories and TRICS Assumptions

Group	Location Type	Characteristics	Share of Site Allocations	TRICS Location Type
1	**Urban Core Areas** (e.g. Kingston Town Centre)	High-density town centre locations with excellent public transport accessibility. These sites are characterised by strong walking, cycling and public transport mode share and comparatively low reliance on private vehicles.	**47%**	Town Centre
2	**Accessible Urban and Suburban Centres** (e.g. Surbiton, New Malden and Tolworth)	Well-connected suburban locations, typically located close to rail stations and/or high-frequency bus corridors. These areas benefit from a range of travel options and exhibit a more balanced distribution of car and sustainable travel modes.	**35%**	Suburban Area
3	**Outer Suburban / Edge Locations** (e.g. Chessington and areas south of the A3)	Lower-density suburban locations situated on the edge of the urban area. These sites generally have lower levels of public transport accessibility and a greater dependence on car travel.	**18%**	Edge of Town Centre / Edge of Town

For the Outer Suburban / Edge Location category, the TRICS 'Edge of Town Centre' and 'Edge of Town' classifications were combined to increase the available sample size and improve the robustness of the resulting trip rates.

2.2 TRICS Analysis

Mode-specific trip rates were developed using data from comparable residential developments across the UK. This provided a representative evidence base for locations with similar accessibility characteristics to the proposed site allocations. To ensure the data reflected current travel behaviour, a number of filtering criteria were applied

- Surveys undertaken prior to 2016 were excluded to focus the analysis on more recent travel trends;
- Surveys undertaken during 2020 and 2021 were omitted due to the exceptional travel conditions associated with the COVID-19 pandemic;
- Only surveys conducted on Tuesdays, Wednesdays and Thursdays were included, reflecting standard industry practice and avoiding potential distortions associated with Mondays and Fridays; and
- In accordance with the TRICS Good Practice Guide (2025), regional filtering was not applied, allowing a larger sample of suitable sites to be included and improving the reliability of the results.

Rates were extracted for the AM peak hour (08:00-09:00) and PM peak hour (17:00-18:00), with all values expressed on a per-dwelling basis to facilitate application across the proposed residential allocations.

Table 2-2: TRICS-Derived Person Trip Rates by Trip Rate Group (Trips per Dwelling)

Trip Rate Group	AM				PM			
	Car	PT	Walk	Cycle	Car	PT	Walk	Cycle
1 – Urban Core Areas	0.153	0.204	0.099	0.013	0.181	0.061	0.096	0.005
2 – Accessible Urban and Suburban Centres	0.093	0.140	0.118	0.012	0.095	0.107	0.096	0.008
3 – Outer Suburban / Edge Locations	0.156	0.142	0.159	0.039	0.189	0.100	0.171	0.033

The trip rates presented in Table 2-2 were subsequently applied to the proposed dwelling numbers for each site allocation to estimate peak period trip generation. These forecasts provided an initial estimate of travel demand and informed the subsequent review of mode shares and trip distribution.

2.3 Validation of Mode Share

The initial TRICS outputs were reviewed against 2011 Census Journey to Work data to ensure that the resulting travel profiles were representative of local conditions. The 2011 Census was selected as the principal benchmark, as travel patterns captured in the 2021 Census were significantly influenced by pandemic-related restrictions and changes in working practices.

The TRICS-derived mode shares were compared with observed travel patterns within Kingston and a selection of comparable outer London boroughs (e.g. Sutton, Hounslow and Richmond upon Thames). These boroughs were selected as they share similar suburban characteristics, levels of public transport accessibility and travel patterns to Kingston.

For the purposes of this comparison, the Census data has been presented only for the principal travel modes considered within the assessment (car, public transport, walking and cycling). Categories that do not represent a travel mode, such as working mainly from home, unemployment and other forms of economic inactivity, have been excluded. Consequently, the Census mode shares shown in Table 2-3 do not sum to 100%. This reflects the scope of the comparison rather than any inconsistency in the underlying data.

Table 2-3: Comparison of TRICS and Census Journey to Work Mode Shares (%)

Mode	TRICS Derived	Kingston	Sutton	Hounslow	Richmond upon Thames
Car	40%	42%	49%	41%	36%
PT	31%	37%	33%	41%	40%
Walk	27%	10%	8%	7%	8%
Cycle	2%	4%	2%	3%	6%
Total	**100%**	**93%**	**92%**	**92%**	**90%**

The comparison identified some notable differences between the TRICS-derived mode shares and observed travel patterns across Kingston and the comparator boroughs. Whilst car travel showed a reasonable degree of consistency, the TRICS outputs indicated a higher proportion of walking trips and lower levels of public transport use than those observed within the Census data. This is likely to reflect the characteristics of individual developments within the TRICS sample, where local accessibility, site layout and surrounding land uses can have a significant influence on travel behaviour.

Whilst the 2011 Census provides the most robust available benchmark for borough-wide travel behaviour, it represents a snapshot in time and does not fully reflect changes in travel patterns, transport provision and policy priorities that have emerged over the intervening period.

The Census comparison was therefore used as a strategic sense check rather than a direct calibration exercise. Whilst the TRICS-derived mode shares were reviewed against observed travel patterns in Kingston and comparable boroughs, the final assumptions were informed principally by an understanding of the accessibility characteristics of the proposed site allocations, the ambition to have car-free development in Kingston town centre and professional judgement. Consideration was given to the differing transport accessibility of the three trip rate groups, the location of sites relative to public transport services and local centres, and the wider objectives of the Local Plan.

Across all site allocations, the resulting assumptions equated to an overall mode share of approximately 28% car, 38% public transport, 28% walking and 5% cycling. The final mode share assumptions adopted within the assessment are presented in Table 2-4.

Table 2-4: Final Mode Share Assumptions by Trip Rate Group

Trip Rate Group	AM					PM				
	Car	PT	Walk	Cycle	Total	Car	PT	Walk	Cycle	Total
1 – Urban Core Areas	10%	45%	40%	5%	100%	15%	45%	35%	5%	100%
2 – Accessible Urban & Suburban Centres	30%	40%	25%	5%	100%	35%	35%	25%	5%	100%
3 – Outer Suburban / Edge Locations	50%	30%	15%	5%	100%	55%	25%	15%	5%	100%

2.4 Final Trip Rate Assumptions

The final trip rates adopted within the assessment are presented in Table 2-5. These rates were derived by applying the revised mode share assumptions shown in Table 2-4 to the trip generation forecasts obtained from the TRICS analysis.

Compared with the initial TRICS-derived rates presented in Table 2-2, the final rates result primarily in a redistribution of trips between modes rather than a significant change in overall trip generation. This reflects the approach adopted throughout the assessment, whereby the overall scale of demand identified through TRICS was retained whilst the modal distribution of trips was refined to better reflect local travel patterns and the accessibility of the proposed development locations.

The final trip rates formed the basis of the trip distribution analysis and subsequent review of strategic travel corridors undertaken to support the air quality assessment.

Table 2-5: Final Person Trip Rates by Trip Rate Group (Trips per Dwelling)

Trip Rate Group	AM				PM			
	Car	PT	Walk	Cycle	Car	PT	Walk	Cycle
1 – Urban Core Areas	0.047	0.211	0.188	0.023	0.051	0.154	0.120	0.017
2 – Accessible Urban & Suburban Centres	0.109	0.145	0.091	0.018	0.107	0.107	0.077	0.015
3 – Outer Suburban /	0.248	0.149	0.074	0.025	0.271	0.123	0.074	0.025

Trip Rate Group	AM				PM			
	Car	PT	Walk	Cycle	Car	PT	Walk	Cycle
Edge Locations								

3. Trip Distribution

3.1 Zoning System

To support the trip distribution analysis, a bespoke zoning system was developed covering Kingston and the surrounding area. The zoning structure was informed by the borough's transport network, key travel corridors and strategic travel movements between Kingston and destinations across London and the South East. Consideration was also given to the location of the proposed Local Plan allocations and the study areas used within the other air quality assessment project.

The adopted zoning system, displayed in Figure 3-1 and Figure 3-2, comprises of five zones within Kingston alongside 13 external zones representing neighbouring boroughs and wider travel markets. Each proposed Local Plan allocation was assigned to one of the five Kingston zones.

Figure 3-1: Kingston Zones

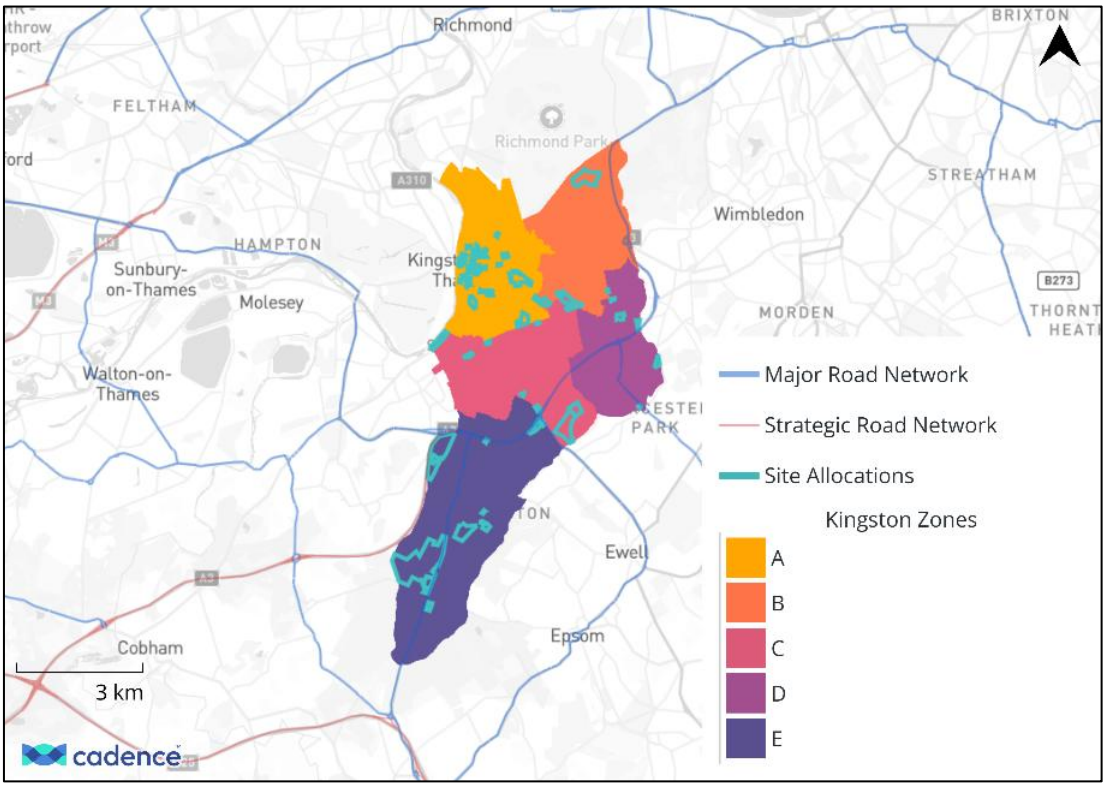
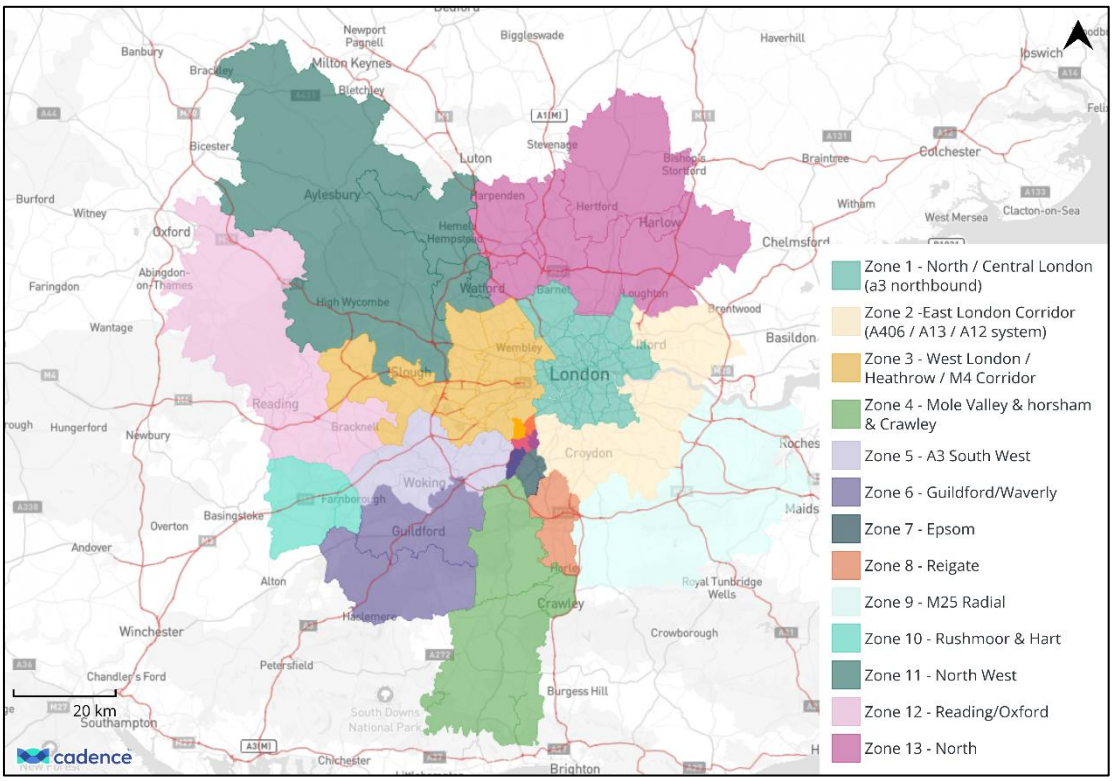


Table 3-1: Kingston Zone Descriptions

Kingston Zone	Description
A	Kingston Town Centre
B	Kingston Hill & New Malden
C	Surbiton & Berrylands
D	Motspur Park & Old Malden
E	Hook & Chessington

Figure 3-2: Adopted Zoning System



The zoning system was derived from the LoHAM, a strategic transport model maintained by Transport for London which covers the entirety of Greater London and its surrounding area. LoHAM output areas are defined at a fine spatial resolution across approximately 5,400 zones. For the purposes of this assessment, individual LoHAM zones were aggregated to align with the bespoke Kingston zoning structure, enabling travel demand data to be analysed at an appropriate scale.

3.2 Origin-Destination Analysis

Origin-destination (O-D) data was extracted from the LoHAM 2019 base year outputs for both the AM peak hour (08:00-09:00) and PM peak hour (17:00-18:00). The analysis focused on car trips, including taxis and private hire vehicles, reflecting the requirement to understand the potential impact of Local Plan growth on highway traffic and to support the wider technical evidence base.

Separate O-D matrices were produced for each Kingston zone, capturing movements between the internal and external zones. These matrices were subsequently converted into

distribution factors representing the proportion of trips travelling between each O-D pair, calculated as the share of each movement relative to the total trip ends for that zone. The resulting distribution factors provided an evidence-based representation of existing travel patterns and were subsequently applied to the forecast vehicle trips generated by the proposed Local Plan allocations. This enabled the likely distribution of development-related traffic across Kingston and the wider area to be estimated.

3.3 Application to Local Plan Trips

The analysis identified a number of consistent travel patterns across Kingston. Whilst each zone exhibited a degree of internal trip-making, a significant proportion of travel demand was directed towards a relatively small number of strategic travel markets. The East London corridor (A406/A12/A13), West London and Heathrow corridor (M4), and the A3 South West corridor accounted for the largest share of external movements across most zones.

The relative importance of these destinations varied across the borough. The central Kingston and Norbiton area (Zone A) and the Kingston Hill/New Malden area (Zone B) displayed particularly strong connections towards West London and Heathrow, especially during the AM peak period. In contrast, the southern parts of the borough, including Surbiton and Chessington (Zones C and E), exhibited stronger links to destinations along the A3 South West corridor and surrounding areas to the south of the borough. Movements towards Epsom and Reigate were also more prominent for the southern zones, reflecting their geographical proximity and established travel patterns.

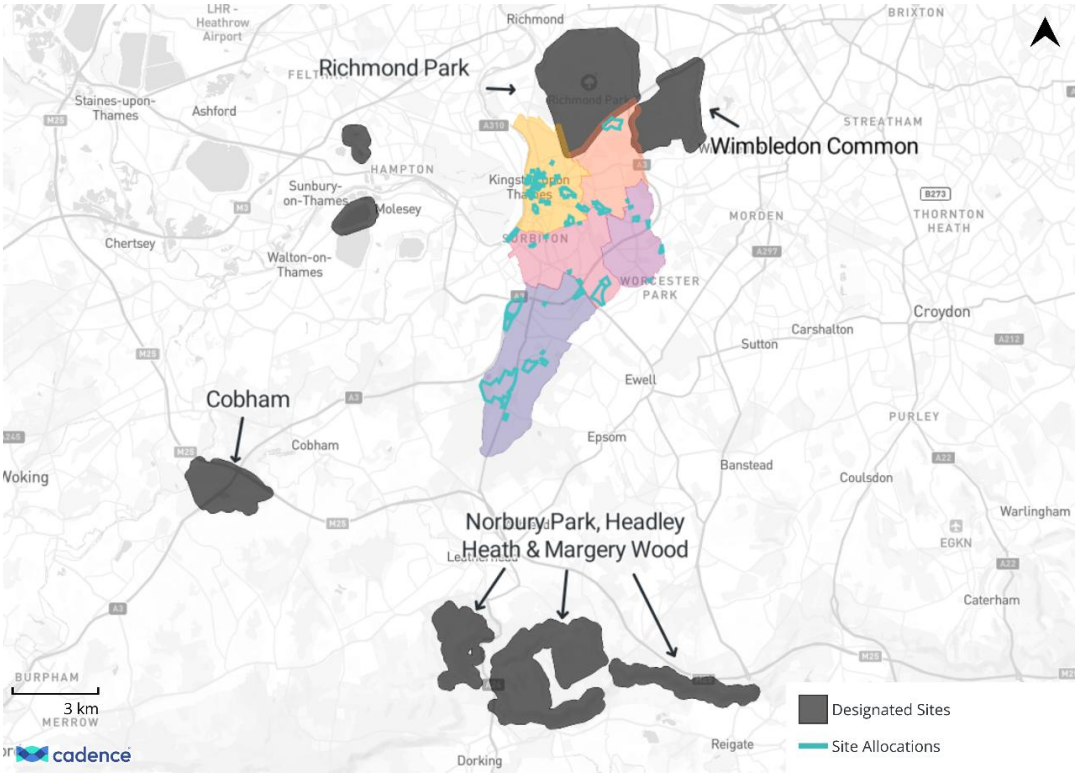
Although some variation was observed between the AM and PM peak periods, the principal travel markets remained broadly consistent. The resulting desire lines provide a strategic representation of how forecast development traffic may be distributed across Kingston and the wider area and were subsequently used to inform a high-level review of potential traffic impacts within the air quality study areas. An interactive representation of the desire line outputs is available in the Cadence data story [Cadence].

4. Air Quality Traffic Assessment

Outside of this project the impact of the Local Plan upon Designated Sites is being forecast and assessed. To support this, City Science forecast the number of nitrous oxide emitting cars passing within 200m of the Designated Sites. Forecasts were provided for 2032, 2037 and 2042 – these being the years at which Local Plan dwelling numbers are reported. Only car trips associated with the Local Plan developments were considered – all other vehicle types were excluded as well as trips that are not associated with the Local Plan. Nitrous oxide is emitted by Internal Combustion Engines (ICE) only, whereas Electric Vehicles (EVs) do not, therefore our analysis focuses on ICE cars and take into account the forecast uptake of EVs.

Figure 4-1 illustrates the locations of the areas covered by the Designated Sites with 200m buffer. The 200m buffer is included throughout the analysis. In our analysis, Norbury Park, Headley Heath and Margery Wood are considered as a single site. The Designated Sites to the West of Kingston, surrounding Hampton and Sudbury-on-Thames, are not sensitive to nitrous oxide to this study and therefore are excluded from the analysis.

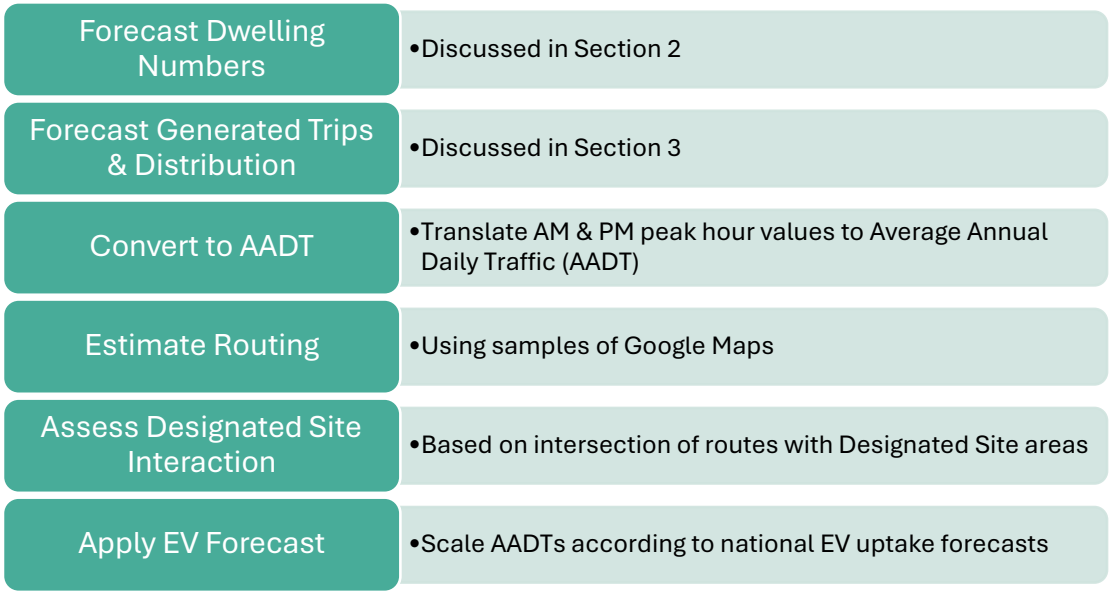
Figure 4-1: The Designated Sites



4.1 Summary of Method

Figure 4-2 provides a summary of the method to forecast the number of ICE cars, related to Local Plan dwellings, interacting with each of the Designated Sites. The analysis builds on the origin-destination matrix of car movements previously developed using the methods discussed in Sections 2 and 3, which related to all cars (e.g. not differentiation between ICE and EV). The following subsections describe the subsequent steps in more detail.

Figure 4-2: Summary of Method



4.1.1 AADT Conversion

The analysis discussed in Sections 2 and 3 provides the number of car trips travelling between each of the internal and external zone pairings, during the AM and PM peak hours. These have been converted to Annual Average Daily Traffic figures which are more suitable for assessing impacts upon the Designated Sites due to providing an indication of the potential scale of development-related traffic throughout the day LoHAM interpeak (IP) flows and matrices were not available for this study, so a full AM plus IP plus PM build-up to AADT could not be derived directly from the model. AADT has instead been estimated by applying a factor of 3 x 2.22 to the combined AM and PM peak hour trips.

The combined 2.22 factor is itself made up of two components. A factor of 1.78 converts the AM and PM peak hour flows to a 6-hour equivalent, accounting for the interpeak period; this was derived from the ratio of LoHAM interpeak flow to combined AM and PM flow, on the assumption that this ratio is broadly consistent across the study area. A further factor of 1.25, derived from National Travel Survey (NTS) data, converts the resulting 6-hour flow to a full 24-hour AADT figure.

This approach is considered a pragmatic and proportionate substitute for a full model-derived AADT, given the absence of LoHAM interpeak data at this stage, though it is expected to produce a less precise estimate than a build-up from a complete set of model time periods. The 1.78 factor in particular assumes that the LoHAM-derived interpeak to AM/PM ratio is transferable to the roads relevant to each study area, which may not hold precisely where traffic composition or peak spreading differs from the LoHAM reference roads; this is noted here as a limitation of the results presented in Table 4-2.

4.1.2 Routing Estimation

The routes the traffic would take between the OD pairs was estimated. Given the strategic nature of the assessment, and the lack of suitable and available highway assignment model data, a detailed traffic assignment exercise was not undertaken. Instead, an approach using Google Maps was used to estimate the routing. The geographical centroid of each of the zones was calculated using QGIS in-built functionality. These centroids were then used as

the beginning or end point of the trip entered into Google Maps. The quickest route by car output from Google Maps was extracted as a GIS file.

Because Google Maps routing can vary depending due to factors such as expected or observed congestion, two samples were taken with journeys beginning on:

- Tuesday 15th September 2026 8.30pm
- Thursday 19th March 2027 5pm

These dates and times were selected due to being considered representative of a typical travel day and time within the AM and PM peaks. All other user settings where set to their default setting.

4.1.3 Traffic Interaction with Designated Sites

For each of the ODs, the routes were overlaid with the areas covered by the Designated Sites. AADT passing through each Designated Site was calculated by accumulating the AADT of the ODs which have a route intersecting with it. For ODs which the samples of Google Maps yielded different routes, the AADT was scaled according to the proportion of route samples which intersected with the Designated Site. This approach assumes that all traffic between the ODs will follow the routes provided by Google Maps samples, whereas in reality other routes are likely to be taken as well.

4.1.4 EV Uptake

The AADT values for the Designated Sites were split into the composition of ICE and EV vehicles. This was done based on a forecast split of mileage by cars between ICE and EV vehicles, for the given year. Given the uncertainty around EV uptake, two forecasts were used:

- **DfT TAG**: Uses values provided by the DfT's Transport Analysis Guidance Databook[1]. This forecast represents lesser uptake of EVs.
- **DfT CAS VL**: Uses values provided for the Vision-Led scenario in the DfT's Common Analytical Scenarios[2]. The forecast represents greater uptake of EVs.

Both of these forecasts relate to the United Kingdom as a whole, and are not specific to RBK. Table 4-1 lists the proportion of car vehicle miles that are forecast to be conducted by ICE vehicles. These values were applied to determine the proportion of AADT within the Designated Sites that related to ICE vehicles, with the remainder of the AADT being attributed to EVs.

Table 4-1: ICE Vehicle Mileage Proportion

Forecast	2032	2037	2042
DfT TAG	59%	38%	26%
DfT CAS VL	49%	24%	9%

[1] https://www.gov.uk/government/publications/tag-data-book

[2] https://www.gov.uk/government/publications/common-analytical-scenarios-databook

4.2 Results

Table 4-2 lists the results of the analysis, showing the number of additional ICE Cars that are forecast to travel through the Designated Sites, in a typical day, as a result of the Local Plan developments. Values are provided as for three years in the Local Plan period, and for the two differing EV uptake forecasts.

For each Designated Site and year, the DfT TAG values are greater. This is due to the lower EV uptake associated with that forecast leading to a greater proportion of the trips being by ICE vehicles.

The results should be interpreted as a strategic indication of the relative scale of development-related traffic that may interact with each Designated Site. As described previously, the assessment represents a precautionary screening exercise rather than a detailed traffic assignment model.

Table 4-2: ICE Cars AADT by Designated Site, Year & EV Forecast

Designated Site	DfT TAG			DfT CAS VL		
	2032	2037	2042	2032	2037	2042
Richmond Park	165	497	521	136	311	186
Wimbledon Common	114	257	266	94	160	95
Norbury Park, Headley Heath & Margery Wood	480	895	900	396	559	321
Cobham	440	765	724	364	477	258

5. Summary

This note has set out the methodology used to estimate the travel demand associated with the proposed Local Plan site allocations. The approach combined TRICS-derived trip rates, Census travel data and strategic transport model outputs to develop forecasts of trip generation and distribution across the RBK and the wider area.

The analysis indicates that the majority of forecast vehicle trips are likely to make use of strategic corridors connecting Kingston town centre with Central London, West London and Heathrow, with lower levels of demand distributed towards destinations to the south and south-west of the borough.

Analysis was also undertaken to identify the number of nitrous oxide emitting cars passing within 200m of Designated Sites, due to the Local Plan. This found that even with assumptions of low EV uptake, a maximum of 900 more nitrous-oxide emitting vehicles are forecast pass through the worst-affected Designated Site.

The analysis provides a strategic understanding of the travel demand associated with the proposed allocations and supports consideration of their potential impacts on the transport network and wider environmental assessments undertaken as part of the Local Plan process.

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Habitats Regulations Assessment

Kingston's Local Plan

Shaping the future together Our vision for Kingston **2028 - 2043**

There are a number of ways to find out more and share your comments on the Habitats Regulations Assessment:

- Visit the website and complete our online form: **www.kingston.gov.uk/localplan**
- Email us: **localplan@kingston.gov.uk**
- Visit your local open library to pick up a printed response form and stamped addressed envelope: **www.kingston.gov.uk/libraries**
- Visit the Information and Advice Centre, Guildhall 2, High Street, Kingston, KT1 1EU to pick up a printed response form and a stamped addressed envelope
- Send in your comments by post to Spatial Planning Team, The Royal Borough of Kingston upon Thames, Guildhall 2, High Street, Kingston upon Thames, KT1 1EU.

If you need the Local Plan in an alternative format, or if you have a question, please email **localplan@kingston.gov.uk** or call our Contact Centre on **020 8547 5000.**

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THE ROYAL BOROUGH OF KINGSTON UPON THAMES