



Three Rivers Local Plan

Habitats Regulations Assessment

Three Rivers District Council

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Executive Summary

This report presents the Habitats Regulations Assessment (HRA) of the Three Rivers Local Plan in relation to listed and proposed European sites (e.g. Special Areas of Conservation (SACs) and Special Protection Areas (SPAs), Ramsar sites, and any sites required to compensate for adverse effects on such sites.

The HRA was undertaken between October 2025 and January 2026 to determine whether Likely Significant Effects (LSEs) on relevant European and Ramsar sites and their qualifying features can be excluded.

This HRA screening considers the following sites:

- Aston Rowant SAC;
- Burnham Beeches SAC;
- Chilterns Beechwoods SAC;
- Lee Valley SPA;
- Lee Valley Ramsar;
- Richmond Park SAC;
- South West London Waterbodies SPA;
- South West London Waterbodies Ramsar;
- Thames Basin Heaths SPA;
- Windsor forest and Great Park SAC; and
- Wormley-Hoddesdonpark Woods SAC.

The HRA identified potential impact pathways from sixteen housing sites which could lead to LSEs in relation to physical damage or degradation of habitats and increased disturbance on one European site, Chilterns Beechwoods SAC.

Therefore, the next stage of the HRA, Stage 2: Appropriate Assessment, has been undertaken. The Appropriate Assessment found that adverse effects on the integrity of any European and Ramsar site alone or in combination arising from physical damage, degradation of habitats and increased disturbance could be excluded as a result of mitigation provided by Local Plan policy *Chiltern Beechwoods SAC*. This policy is considered sufficient to mitigate against the deterioration the Chilterns Beechwoods SAC.



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A.1 Legislation

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A.2 Policy

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A.3.4 C-461/17 Holohan v An Bord Pleanála

A.3.5 EWHC 351 Wealden District Council v Secretary of State for Communities And Local Government & Ors 2017 (Admin)

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A.4.3 European Commission guidance – Assessment of plans and projects in relation to Natura 2000 sites – Methodological Guidance on the Provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC (2021)

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A.4.5 Government guidance – Habitats regulations assessments: Protecting a European site (2023)

A.4.6 Government guidance – Nationally Significant Infrastructure Projects: Advice on Habitats Regulations Assessments (2024)

A.4.7 The Habitats Regulations Assessments Handbook (2024)

Appendix B Information on European and Ramsar Sites

B.1 European and Ramsar Sites within 20 km of the TRDLP Boundary

B.2 European and Ramsar Sites more than 20 km from the TRDLP Boundary



Acronyms and Abbreviations

AA	Appropriate Assessment
BNG	Biodiversity Net Gain
DLHHV	Designed Landscapes of High Historic Value
EEC	European Economic Community
HRA	Habitats Regulations Assessment
INNS	Invasive Non-Native Species
IROPI	Imperative Reasons of Overriding Public Interest
LNRS	Local Nature Recovery Strategy
LSE	Likely Significant Effect
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SEA	Strategic Environmental Assessment
SPA	Special Protection Area
SLR	SLR Consulting Limited
Zol	Zone of Influence



1.0 Introduction

1.1 Background

SLR Consulting Limited (SLR) has been commissioned by Three Rivers District Council (TRDC) to prepare a Habitats Regulations Assessment (HRA) report in support of the Three Rivers District Local Plan (TRDLP). This report presents the findings from the TRDLP HRA Stage 1 Screening and the Stage 2 Appropriate Assessment.

1.2 Three Rivers District Local Plan

TRDC is preparing a Local Plan for the district, to manage the future development and growth of the district between 2024 and 2041. This is intended to replace the previous Core Strategy (adopted October 2011), the Development Management Policies Local Development Document (adopted July 2013), and the Site Allocations Local Development Document (adopted on 2014). It will also reflect relevant legislative requirements, as well as those of the National Planning Policy Framework (NPPF)¹ and National Planning Practice Guidance (NPPG).

The draft TRDLP is the Regulation 19 draft version and was subject to HRA Screening between October 2025 and January 2026. The draft TRDLP contains proposed policies and site allocation, and the findings are presented within this report.

1.3 Habitats Regulations Assessment

The purpose of the HRA is to determine whether the plan, in this case the TRDLP, is compliant with the Habitats Regulations. HRA findings feed into the parallel Sustainability Appraisal (SA) which incorporates Strategic Environmental Assessment (SEA), an integral part of the plan preparation process.

The Habitats Regulations afford protection to European sites (Special Protection Areas (SPAs) and Special Areas of Conservation (SACs)) and their interest or qualifying features, with Part 6 setting out the requirements for screening assessments, the circumstances under which an AA is required and the further implementation of Article 6(3) and 6(4) of the Habitats Directive.

The requirement for an Appropriate Assessment (AA) is set out within Article 6 of the Habitats Directive 92/43/ European Economic Community (EEC) of 21 May 1992 (as amended) on the conservation of natural habitats and of wild fauna and flora, which was most recently transposed into British law by the Conservation of Habitats & Species Regulations 2017 (as amended), also known as the 'Habitats Regulations'.

The UK left the European Union on the 31st January 2020, followed by Completion Day on 31st December 2020. The EU Exit Regulations (2019) establish any EU Exit-related changes to the Habitats Regulations (2017), with these considered to have no material implications on the requirement or process for a HRA of a plan. After Brexit, UK sites designated under the Habitats Regulations became part of the National Site Network (as defined in the interpretation sections of the Habitat Regulations (2017)), with a focus on maintaining ecological coherence throughout the UK.

In addition to the Habitats Regulations, UK Government policy (Office of the Deputy Prime Minister Circular 06/2005) states that internationally important wetlands designated under

¹ Department for Levelling Up, Housing & Communities (2024) National Planning Policy Framework. Available at: https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf [Accessed: 20/12/25].



the Convention on Wetlands 1971, called the Ramsar Convention (Ramsar sites) are afforded the same protection as SPAs and SACs for the purpose of considering development proposals that may affect them.

The Government also affords the same level of policy protection to potential SPAs, possible SACs and proposed Ramsar sites and to sites identified, or required, as compensatory measures for adverse effects on any of the above sites, through planning policy such as the NPPF.



2.0 Methodology

2.1 Relevant Legislation, Policy, Case Law and Guidance

Legislation, policies, case law and guidance relevant to the plan-level HRA of the new TRDLP are provided in further detail in Appendix A, including references. A summary is outlined below:

Legislation

- The Habitats Regulations; and
- The Environment Act (2021).

Policy

- National Planning Policy Framework (2024).

Case Law

- C-323/17 People Over Wind;
- C-164/17 Grace and Sweetman;
- C-293/17 and C-294/17 Dutch Nitrogen cases;
- C-461/17 Holohan v An Bord Pleanála; and
- EWHC 351 Wealden District Council v Secretary of State for Communities and Local Government & Ors 2017 (Admin).

Guidance

- Managing Natura 2000 Sites – the Provisions of Article 6 of the ‘Habitats’ Directive 92/43/EEC (2018);
- Government guidance – Appropriate assessment: Guidance on the use of Habitats Regulations Assessment (2019);
- European Commission guidance – Assessment of plans and projects in relation to Natura 2000 sites – Methodological Guidance on the Provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC (2021);
- Assessment of plans and projects in relation to Natura 2000 sites (2022);
- Government guidance – Habitats regulations assessments: Protecting a European site (2023);
- Government guidance – Nationally Significant Infrastructure Projects: Advice on Habitats Regulations Assessments (2024); and
- The Habitats Regulations Assessments Handbook (2024).

2.2 The HRA Process

The methodology used in this report is based on and in accordance with the UK Government² guidance (Appendix A.4.3). The new TRDLP is a plan, rather than a project, and the HRA shall follow the four stages outlined below. The stages may not all need completing, depending on decisions at each stage.

² Organisations involved in producing this UK government guidance include the Department for Environment, Food & Rural Affairs, Natural England, Welsh Government, and Natural Resources Wales.



- **Stage 1: Screening** – the process that determines whether the Plan is directly connected with or necessary for the conservation management of a European or Ramsar site and, if not, whether all Likely Significant Effects (LSEs) upon European and Ramsar sites of the Plan, either alone or in-combination with other projects or plans, can be objectively excluded (without considering mitigation) and therefore whether Stage 2 is required;
- **Stage 2: AA** – the consideration of effects on the integrity of the European or Ramsar sites of the Plan, either alone or in-combination with other projects or plans, in respect of the listed or proposed European or Ramsar sites' structure and function and its conservation objectives. Additionally, where adverse effects on site integrity are identified, an assessment of the potential mitigation of those effects is undertaken. The assessment of the effect on integrity of the site is undertaken including the effect of such mitigation;
- **Stage 3: Assessment of Alternative Solutions** – the process which examines alternative ways of achieving the objectives of the project or plan that might avoid or reduce the adverse effects on the integrity of the European or Ramsar sites; and
- **Stage 4: Imperative Reasons of Overriding Public Interest (IROPI) and Compensatory Measures** – the assessment where no alternative solutions exist and where adverse effects on the integrity of the European or Ramsar sites remain, IROPI has been identified. If it is deemed that the project or plan should be allowed to proceed, compensatory measures are identified, secured and their effectiveness ascertained.

2.2.1 Stage 1: Screening

Stage 1: Screening will follow the European Commission guidance (A.4.3), and the four steps outlined below.

Step 1: Ascertain whether the Plan is directly connected with, or necessary to, the management of a listed or proposed European or Ramsar site – to determine if it contributes to achieving the site's conservation objectives.

Step 2: Description of the Plan and its impact factors – appropriate details about the activities carried out within the Plan will be considered and key parameters of the Plan will be identified, such as:

- size (e.g. in relation to direct land-take);
- overall affected area including the area affected by indirect impacts (e.g. noise, turbidity, vibrations);
- physical changes in the environment (e.g. modification of riverbeds or morphology of other water bodies, changes in the density of forest cover);
- changes in the intensity of an existing pressure (e.g. increase in noise, pollution or traffic);
- resource requirements (e.g. water abstraction, mineral extraction);
- emissions (e.g. nitrogen deposition) and waste (and whether they are disposed of on land, water or in the air);
- transportation requirements (e.g. access roads);
- duration of construction, operation, decommissioning, etc.;
- temporal aspects (timing of the different stages of a plan or project);



- distance from listed or proposed European and Ramsar sites and in particular from their designating features; and
- cumulative impacts with other projects and plans.

Step 3: Identify which listed or proposed European and Ramsar sites may be affected by the Plan – all aspects of the Plan that could have potential effects on the sites through potential impact pathways will be considered. This will take account of the sites, their qualifying features and their Conservation Objectives (COs).

Step 4: Assess whether LSEs can be ruled out in view of the site's COs – the potential impacts identified will be assessed in terms of their likelihood and significance. Policies and sites will be screened out where there is no pathway for impact, or a pathway is so weak that there is no possibility for significant effects, either alone or in-combination.

Screening of the TRDLP policies will use the following criteria from the Habitats Regulations Assessments Handbook outlined in Appendix A (A.4.7)

Table 2-1: Screening Criteria

Screening Category	Description	Screening Outcome
A	General statement of policy/general aspiration	Screen out
B	Policy listing general criteria for testing the acceptability/sustainability of proposals	Screen out
C	Proposal referred to but not proposed by the plan	Screen out
D	General plan-wide environmental protection/ site safeguarding/ threshold policies	Screen out
E	Policies or proposals which steer change in such a way as to protect listed or proposed European and Ramsar sites from adverse effects	Screen out
F	Policy that cannot lead to development or other change	Screen out
G	Policy or proposal that could not have any conceivable effect on a listed or proposed European or Ramsar site	Screen out
H	Policy or proposal the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in-combination with other aspects of this or other plans or projects)	Screen out
I	Policy or proposal which may have a likely significant effect on a listed or proposed European or Ramsar site alone	Screen in
J	Policy or proposal with an effect on a listed or proposed European or Ramsar site but unlikely to be significant alone, so need to check for likely significant effects in-combination	Dependent on in-combination test
K	Policy or proposal unlikely to have a significant effect either alone or in-combination	Screen out after the in-combination test
L	Policy or proposal which might be likely to have significant effect in-combination	Screen in after the in-combination test
M	Bespoke area, site or case-specific policies or proposals intended to avoid or reduce harmful effects on an international nature conservation site	Screen in



There are no COs for Ramsar sites, instead those for overlapping SACs and SPAs will be considered (in particular, where the qualifying features are the same). In the absence of any proxy COs, it will be assumed that the objective is to ensure the habitat types, or habitats of species significantly present on the site do not deteriorate below the current level (at the time of the assessment) and that the species are not significantly disturbed.

The in-combination assessment will consider the cumulative impacts of all the policies within the TRDLP as well as with other plans and projects. The plans considered for in-combination effects initially include the neighbouring authorities' local plans, as listed below, which also cover the extent of potential impacts that may arise from the TRDLP policies:

- Dacorum Borough Council Local Plan³;
- St Albans City & District Local Plan⁴;
- Hertsmere Borough Council Local Plan⁵;
- Watford Borough Council Local Plan⁶;
- Buckinghamshire Local Plan⁷;
- London Borough of Hillingdon Local Plan⁸;
- London Borough of Harrow Local Plan⁹;
- Greater London Plan (London Plan)¹⁰;
- Hertfordshire Minerals Local Plan¹¹;
- Hertfordshire Waste Local Plan¹²; and
- Buckinghamshire Minerals and Waste Local Plan¹³.

³ Dacorum Borough Council (2025) Dacorum Local Plan. Available at: <https://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/new-single-local-plan> [Accessed 15/01/2026]

⁴ St Albans City and District Council (2024) New Local Plan. Available at: <https://www.stalbans.gov.uk/new-local-plan> [Accessed 15/01/2026]

⁵ Hertsmere Borough Council (2025) Hertsmere Local Plan. Available at: <https://www.hertsmere.gov.uk/planning-building-control/planning-policy/hertsmere-local-plan> [Accessed 15/01/2026]

⁶ Watford Borough Council (2021) Watford Local Plan. Available at: <https://www.watford.gov.uk/planning-policy-local-plan-1/watford-local-plan> [Accessed 15/01/2026]

⁷ Buckinghamshire Council (2025) The Local Plan for Buckinghamshire. Available at: <https://www.buckinghamshire.gov.uk/planning-and-building-control/planning-policy/local-planning/buckinghamshire-local-plan/> [Accessed 15/01/2026]

⁸ Hillingdon Council (2020) Local Plan. Available at: <https://www.hillingdon.gov.uk/local-plan-and-review> [Accessed 15/01/2026]

⁹ London Borough of Harrow (2025) New Local Plan. Available at: <https://www.harrow.gov.uk/planning-developments/new-local-plan-consultation> [Accessed 15/01/2026]

¹⁰ Greater London Authority (2021) The London Plan 2021. Available at: <https://www.london.gov.uk/programmes-strategies/planning/london-plan/london-plan-2021> [Accessed 15/01/2026]

¹¹ Hertfordshire County Council (2007) Adopted Minerals Local Plan. Available at: <https://www.hertfordshire.gov.uk/services/recycling-waste-and-environment/planning-in-hertfordshire/minerals-and-waste-planning/minerals-planning/minerals-planning.aspx> [Accessed 15/01/2026]

¹² Hertfordshire County Council (2014) Adopted Waste Local Plan. Available at: <https://www.hertfordshire.gov.uk/services/recycling-waste-and-environment/planning-in-hertfordshire/minerals-and-waste-planning/waste-planning/waste-planning.aspx> [Accessed 15/01/2026]

¹³ Buckinghamshire Council (2019) Minerals and Waste Plan Available at: <https://www.buckinghamshire.gov.uk/planning-and-building-control/building-or-improving-your-property/minerals-and-waste/> [Accessed 15/01/2026]



3.0 Stage 1: Screening

3.1 Step 1

The TRDLP is not directly connected with or necessary to the management of any listed or proposed European and Ramsar sites; therefore, Stage 1: Screening must be undertaken following Steps 2 to 4.

3.2 Step 2

The TRDLP sets out the spatial strategy for development across Three Rivers, indicating where different types of development should be located within the district. The Plan will form the blueprint for how the council will deliver sustainable development in the district up to 2041, including managing needs for housing, jobs and supporting infrastructure – for example, shops, community facilities, transport, open spaces, schools and healthcare. The plan will be used to determine planning applications within the district and also show developers where land is available. The TRDLP consists of written policies (listed in Table 3-2) and supporting information, together with a map.

There is potential for the TRDLP to lead to expansion of the urban area for housing and employment, which could result in impacts within the TRDLP boundary as well as outside of this district. Potential impacts that are to be considered as part of the screening are listed in Table 3-1 as these may lead to adverse effects on the integrity of listed or proposed European and Ramsar sites and their qualifying features. There are no listed or proposed European and Ramsar sites located within the TRDLP boundary. The nearest European sites are located 8 km to the west of the TRDLP boundary and the next nearest Ramsar site is located 14 km to the south west of the TRDLP boundary (Appendix B).

Table 3-1: Potential Impacts

Potential Impacts	Description
Habitat loss	A direct loss of habitat within the boundaries of a listed or proposed European or Ramsar site itself. This would also include the loss of Functionally Linked Land (FLL), which affects the abilities of the listed or proposed European or Ramsar sites' qualifying species to utilise the habitat and move between it.
Habitat isolation	Development or activities resulting in a separation of existing habitats.
Physical damage or degradation of habitats	Direct damage to sites such as through fire, vandalism, littering, trampling, grazing and erosion by people using the listed or proposed European and Ramsar sites recreationally.
Increased disturbance	Impacts on sight or sound that result in a change in behaviour of species from usual routines. Can occur from sources such as traffic, construction, or recreation.
Reduced mobility or migration of species	Habitat loss and increased disturbance could reduce the ability for mobile and migratory species to travel.
Spread of Invasive Non-Native Species (INNS) or undesirable species	Introduction or spread of species which can result in negative impacts to native species / habitats through direct competition or spread of disease. This can lead to simplification of and / or loss of qualifying species within listed or proposed European and Ramsar sites.
Hydrological changes	Impacts to water levels or flows through direct or indirect impacts can negatively affect habitats and species through a reduction or increase in availability of water. Can occur from drainage changes or abstraction.



Potential Impacts	Description
Turbidity and siltation	Introduction of particulate matter into watercourses can reduce the ability of plants or animals to access light or create a reduction in water levels. Can occur from surface run-off from impermeable surfaces or exposed land during construction.
Pollution (aerial or waterborne)	Activities which introduce harmful compounds into natural environments, such as ammonia from fertiliser or sulphurous oxides from vehicle emissions. This also includes nitrate or phosphate pollution to watercourses, which may result from diffuse pollution or discharges from wastewater treatment works. These can negatively impact qualifying habitats and species of listed or proposed European and Ramsar sites.

3.3 Step 3

The following sites were identified with potential impact pathways due to the impacts listed in Table 3-1. These were derived from an initial 20 km buffer, which was then extended to 27 km to include additional sites as a result of potential recreational pathways. Other impacts are not anticipated for these sites as they are located within separate hydrological catchments and no further impact pathways exist at these distances as a result of the TRDLP. The following European and Ramsar sites were included:

- Aston Rowant SAC;
- Burnham Beeches SAC;
- Chilterns Beechwoods SAC;
- Lee Valley SPA;
- Lee Valley Ramsar;
- Richmond Park SAC;
- South West London Waterbodies SPA;
- South West London Waterbodies Ramsar;
- Thames Basin Heaths SPA;
- Windsor forest and Great Park SAC; and
- Wormley-Hoddesdonpark Woods SAC.

The locations of these European and Ramsar sites are shown in **Figure 3-1**.





3.4 Step 4

3.4.1 Screening of Policies

Chapter 1 of the TRDLP is screened out as this contains administrative text to introduce the Plan. Chapter 2 is also screened out as this refers to the overall vision and strategic priorities of the Plan, setting out the general aspiration, with subsequent policies providing specific details for assessment.

The potential effects on these European and Ramsar sites as a result of the TRDLP policies are outlined in Table 3-2. The screening categories used within this table follow the descriptions and criteria outlined in Table 2-1. Green indicates that the policy can be screened out, with red indicating that the policy must be screened in and taken forward for further assessment of the effects on site integrity.



Table 3-2: HRA Pre-Screening of TRDLP Policies

Policy	Policy Summary	Assessment of LSE alone	In-combination assessment	Pre-screening category and outcome
Chapter 3 – Spatial Strategy				
Advertisements	This policy seeks to ensure advertisements are appropriately sited and designed to protect amenity, public safety, and local character, avoiding clutter, light pollution, and impacts on heritage, wildlife, and highways.	The policy outlines general criteria for the design and siting of advertisements and shop fronts, therefore there are no foreseeable pathways to LSE on European and Ramsar sites.	N/A – no pathways identified	B - Policy listing general criteria for testing the acceptability/sustainability of proposals Screen out: LSEs can be objectively excluded for this policy alone and in-combination.
Affordable Housing	Requires all new housing developments to provide affordable housing (40% overall, higher in Green Belt), sets tenure mix, and supports rural exception sites for 100% affordable housing.	This policy outlines sets out a requirement for affordable housing provision. The policy will not lead to an increase in the number of dwellings, rather it sets out the type and tenure mix within developments. As a result, the policy could not lead to any LSEs on European/ Ramsar sites as there are no impact pathways.	N/A – no pathways identified	G - Policy or proposal that could not have any conceivable effect on a listed or proposed European or Ramsar site Screen out: LSEs can be objectively excluded for this policy alone and in-combination.
Biodiversity	Requires all qualifying development to deliver at least 10% Biodiversity Net Gain (BNG), follow the mitigation hierarchy, protect designated sites (including SACs, SPAs, Ramsar), and enhance connectivity via Local Nature Recovery Strategy.	The policy aims to protect and enhance biodiversity across the District. The policy seeks to protect European and Ramsar sites. There are no foreseeable pathways to LSE on European and Ramsar sites.	N/A – no pathways identified	E – Policies or proposals which steer change in such a way as to protect listed or proposed European and Ramsar sites from adverse effects. Screen out: LSEs can be objectively excluded for this policy alone and in-combination.
Broadband and Electronic Communications	Supports reliable, high-quality broadband and electronic communications, sets design/siting criteria for equipment, and requires new development to be capable of super-fast full-fibre connection prior to occupation.	The policy outlines general criteria for the design, siting, and delivery of telecommunications and broadband infrastructure, therefore there are no foreseeable pathways to LSE on European and Ramsar sites.	N/A – no pathways identified	B - Policy listing general criteria for testing the acceptability/sustainability of proposals Screen out: LSEs can be objectively excluded for this policy alone and in-combination.
Chilterns Beechwoods SAC	Requires HRA for residential development within the Chilterns Beechwoods SAC Zone of Influence (ZOI) where proposals result in a net increase of 100+ units. Mandates mitigation/avoidance measures for recreational disturbance, including provision or funding of Suitable Alternative Natural Greenspace (SANG) in line with the latest Mitigation Strategy.	This policy seeks to reduce recreational pressure on the Chilterns Beechwoods SAC. Residential development is permitted within the ZOI for the SAC, however it is limited to 100 dwellings per proposal before the developer is required to include mitigation measures. It is considered that the policy will sufficiently mitigate any potential increase in recreation arising from development within the ZOI, therefore no LSEs on the Chilterns Beechwoods SAC have been identified.	N/A – no pathways identified	D - General plan-wide environmental protection/ site safeguarding/ threshold policies E - Policies or proposals which steer change in such a way as to protect international nature conservation sites from adverse effects Screen out: LSEs can be objectively excluded for this policy alone and in-combination.
Deliveries Servicing and Construction	Requires Construction Management Plans and Delivery/Servicing Plans to manage traffic, amenity, and operational impacts during construction and occupation.	The policy outlines general criteria for managing construction and servicing. There are no foreseeable pathways to LSE on European and Ramsar sites due to the distance from the TRLP boundary to these sites, and the lack of hydrological connectivity between the TRLP area to European and Ramsar sites.	N/A – no pathways identified	B - Policy listing general criteria for testing the acceptability/sustainability of proposals Screen out: LSEs can be objectively excluded for this policy alone and in-combination.



Policy	Policy Summary	Assessment of LSE alone	In-combination assessment	Pre-screening category and outcome
Design Criteria	Provides detailed guidance for residential and non-residential development on privacy, amenity space, built form, outlook, daylight, and extensions. Seeks to ensure high-quality design and protection of local character.	The policy outlines general standards for new residential development to ensure high-quality design which is in keeping with the local character. There are no foreseeable pathways to LSE on European and Ramsar sites.	N/A – no pathways identified	B - Policy listing general criteria for testing the acceptability/sustainability of proposals Screen out: LSEs can be objectively excluded for this policy alone and in-combination.
Development in the Green Belt	Sets criteria for agricultural/forestry dwellings, extensions, replacement buildings, conversions, ancillary buildings, and changes of use in the Green Belt. Emphasises preserving openness and preventing inappropriate development.	This is a general policy which outlines criteria for development within the Green Belt. Residential development may be permitted where it is required to enable agricultural or forestry workers to live in the immediate vicinity of their place of work. Residential development is permitted within the Chilterns Beechwoods SAC without mitigation if the proposal is for less than 100 dwellings. Should residential development be permitted in the Green Belt, it would be for less than 100 dwellings. As a result, there are no feasible recreational pathways to the Chilterns Beechwoods SAC resulting from this policy. The TRDLP boundary is not within the catchment which could lead to LSEs on any European/ Ramsar sites, therefore there are no feasible hydrological pathways resulting from this policy.	N/A – no pathways identified	K – Policy or proposal unlikely to have a significant effect either alone or in-combination. Screen out: LSEs can be objectively excluded for this policy alone and in-combination.
Employment and Economic Development	Seeks to facilitate economic growth by promoting office, industrial, warehousing, creative industries (including Leavesden Studios), and mixed-use development. Supports intensification within designated employment areas and allows redevelopment outside these areas subject to criteria.	The policy outlines the allocation of land for new employment developments. Development of employment areas may lead to impacts arising from construction, however, European and Ramsar sites are sufficiently distanced from the TRDLP boundary, and not hydrologically connected to any European or Ramsar sites. As a result, The policy could not lead to any LSEs on European/ Ramsar sites.	N/A – no pathways identified.	A – General statement of policy/general aspiration B – Policy listing general criteria for testing the acceptability/sustainability of proposals Screen out: LSEs can be objectively excluded for this policy alone and in-combination
Flood Risk and Water Resources	Requires development to avoid flood risk, apply sequential and exception tests, integrate SuDS, maintain riparian buffers, and protect/enhance water quality and resources. Sets water efficiency standards and wastewater infrastructure requirements.	The policy outlines criteria to manage flood risk and water quality, including the use of nature-based solutions which should reduce the impact of flooding. Any development of infrastructure as a result of this policy would not result in LSEs on European/Ramsar sites because there are no waterways within the TRDC boundary which are hydrologically connected to European/Ramsar sites.	N/A – no pathways identified	E – Policies or proposals which steer change in such a way as to protect listed or proposed European and Ramsar sites from adverse effects. Screen out: LSEs can be objectively excluded for this policy alone and in-combination.
SP3 - Infrastructure Delivery	Requires all development to provide the infrastructure necessary to support its impacts. New growth must mitigate environmental, and community impacts. Infrastructure may be delivered on-site, off-site, or through proportional financial contributions, with cross-developer cooperation expected where strategic infrastructure is required. This policy ensures alignment with the Infrastructure Delivery Plan which requires a phased delivery of infrastructure.	The policy required development to provide the necessary infrastructure to support residents. The development of new infrastructure will occur alongside new residential development and will not lead to an increase in the number of residents in the District. This policy will not lead to increased recreation at European and Ramsar Sites, and there are no hydrological pathways identified. Therefore, this policy could not lead to any LSEs on European/ Ramsar sites.	N/A – no pathways identified.	A – General statement of policy/general aspiration Screen out: LSEs can be objectively excluded for this policy alone and in-combination
Local Distinctiveness and Place Shaping	Requires all new development to achieve high-quality design that respects local character, enhances distinctiveness, and integrates landscaping and public realm improvements. Encourages efficient land use and higher density in sustainable locations while safeguarding amenity and biodiversity.	A general policy which supports high-quality design. The policy could not lead to any LSEs on European/ Ramsar sites as there are no impact pathways.	N/A – no pathways identified	B - Policy listing general criteria for testing the acceptability/sustainability of proposals Screen out: LSEs can be objectively excluded for this policy alone and in-combination.



Policy	Policy Summary	Assessment of LSE alone	In-combination assessment	Pre-screening category and outcome
Northwood Headquarters	Supports new development at Northwood HQ to enhance/sustain operational capability; supports redevelopment/ conversion/ change of use of redundant MOD sites/buildings; resists non-military or non-defence development within/around the HQ where it would adversely affect military operations unless impacts can be mitigated or the site is no longer needed for defence.	The policy supports the redevelopment within the existing MOD estate, which will not include residential development. Any construction would be contained on a previously developed site. The site is located within the TRDLP boundary, to the southeast. The site is not located within close proximity to any European or Ramsar sites. The site is not within any catchments which includes European/Ramsar sites? As a result, the policy could not lead to any LSEs on European/ Ramsar sites as there are no impact pathways.	N/A – no pathways identified	K – Policy or proposal unlikely to have a significant effect either alone or in-combination. Screen out: LSEs can be objectively excluded for this policy alone and in-combination.
Open Space, Play Space, Sport and Recreation	Safeguards existing open spaces and recreation facilities, sets criteria for loss or replacement, and requires new provision in major residential developments. Encourages high-quality, multifunctional design and biodiversity enhancement.	The policy outlines general criteria for protecting and providing open space and supports the enhancement of biodiversity and multifunctional design. New or enhanced open space for recreation may contribute to reducing recreational impacts to nearby European and Ramsar sites, in particular the Chilterns Beechwoods SAC.	N/A – no pathways identified	E – Policies or proposals which steer change in such a way as to protect listed or proposed European and Ramsar sites from adverse effects. Screen out: LSEs can be objectively excluded for this policy alone and in-combination.
Overarching policy on sustainable development	Sets out the presumption in favour of sustainable development and requires all proposals to address climate change, efficient land use, biodiversity net gain, flood risk, infrastructure, and design quality. It is a high-level strategic policy guiding all development.	A general policy which supports sustainable development within the district. The policy could not lead to any LSEs on European/ Ramsar sites as there are no impact pathways.	N/A – no pathways identified	A - General statement of policy/general aspiration Screen out: LSEs can be objectively excluded for this policy alone and in-combination.
SP1 - Overall Levels of Growth	Sets a housing requirement of 413 dwellings per year (6,200 over 15 years). Directs delivery to the most sustainable locations in line with the spatial strategy, and safeguards existing employment sites. It requires the council to monitor housing delivery and infrastructure capacity, with the potential for review where additional sustainable growth could be accommodated without unacceptable harm to the Green Belt.	A policy which sets out the annual and future housing growth targets. This policy could be a driver for potential effects on the Chilterns Beechwoods SAC; however, the implications are more clearly assessed under the housing site options.	N/A – no pathways identified	A - General statement of policy/general aspiration Screen out: LSEs can be objectively excluded for this policy alone and in-combination.
Parking Standards	Sets detailed standards for parking across all vehicle types and use classes.	The policy provides technical standards for parking provision. The policy could not lead to any LSEs on European/ Ramsar sites as there are no impact pathways.	N/A – no pathways identified	B - Policy listing general criteria for testing the acceptability/sustainability of proposals Screen out: LSEs can be objectively excluded for this policy alone and in-combination.
Parking	Requires development to provide parking in line with standards, manage on-site spaces, integrate parking into design, include landscaping, and provide EV charging points. Encourages car clubs and sustainable transport measures.	The policy sets design and management standards for parking provision. The policy could not lead to any LSEs on European/ Ramsar sites as there are no impact pathways.	N/A – no pathways identified	B - Policy listing general criteria for testing the acceptability/sustainability of proposals Screen out: LSEs can be objectively excluded for this policy alone and in-combination.
Policy XA	Requires all new dwellings (C3 and C4) to achieve high energy efficiency standards, prohibit fossil fuels, provide on-site renewable energy generation to match predicted energy use, and offset any shortfall via financial contributions. Includes requirements for smart energy systems, post-occupancy monitoring, and performance gap reduction.	The policy is focused on energy performance and carbon reduction. The policy could not lead to any LSEs on European/ Ramsar sites as there are no impact pathways.	N/A – no pathways identified	A - General statement of policy/general aspiration Screen out: LSEs can be objectively excluded for this policy alone and in-combination.
Policy XB	Requires all new non-residential buildings to achieve net zero operational carbon through energy efficiency improvements, prohibition of fossil fuels, on-site renewable energy generation, and offsetting where necessary. Includes smart energy systems and post-occupancy monitoring.	The policy focuses on energy performance and carbon reduction for non-residential development. The policy could not lead to any LSEs on European/ Ramsar sites as there are no impact pathways.	N/A – no pathways identified	A - General statement of policy/general aspiration Screen out: LSEs can be objectively excluded for this policy alone and in-combination.



Policy	Policy Summary	Assessment of LSE alone	In-combination assessment	Pre-screening category and outcome
Policy XC	Requires all development to mitigate and adapt to climate change through sustainable design and construction principles, BREEAM standards for large non-residential schemes, cooling hierarchy, overheating assessments, water conservation, and resilience measures (e.g., SuDS, green/blue infrastructure).	The policy focuses on design quality, energy efficiency, and climate resilience. The policy could not lead to any LSEs on European/ Ramsar sites as there are no impact pathways.	N/A – no pathways identified	A - General statement of policy/general aspiration Screen out: LSEs can be objectively excluded for this policy alone and in-combination.
Policy XD	Requires major developments to complete whole-life carbon assessments, limit embodied carbon, design for material reuse and disassembly, and conduct demolition audits. Smaller developments must provide a narrative on measures to minimise embodied carbon.	The policy focuses on reducing carbon emissions and waste through sustainable construction practices. The policy could not lead to any LSEs on European/ Ramsar sites as there are no impact pathways.	N/A – no pathways identified	A - General statement of policy/general aspiration Screen out: LSEs can be objectively excluded for this policy alone and in-combination.
Policy XE	Supports retrofit-first approach to improve energy efficiency and reduce carbon emissions in existing buildings. Encourages fabric upgrades, low/zero-carbon heating, renewable energy, and sensitive retrofitting of heritage assets. Requires feasibility assessments for demolition and whole-life carbon assessments for major schemes.	The policy promotes sustainability and retrofitting of buildings. The policy could not lead to any LSEs on European/ Ramsar sites as there are no impact pathways.	N/A – no pathways identified	A - General statement of policy/general aspiration Screen out: LSEs can be objectively excluded for this policy alone and in-combination.
Provision for Gypsies, Travellers and Travelling Showpeople	A policy which outlines how the Council will meet the identified need for 37 pitches for Gypsies and Travellers and 6 plots for Travelling Showpeople through a criteria-based approach. Criteria include avoiding flood risk areas, avoiding adverse impacts on wildlife, heritage, and landscape, and ensuring access to services and highways. Existing sites will be safeguarded.	There is a need of 37 pitches, as well as an additional 4 pitches arising from households with undetermined need. Sites allocated as a result of this policy will be small-scale, therefore any potential recreational impacts are likely to be insignificant.	N/A – no pathways identified	K – Policy or proposal unlikely to have a significant effect either alone or in-combination. Screen out: LSEs can be objectively excluded for this policy alone and in-combination.
Renewable and Low Carbon Energy Developments	Supports proposals for renewable energy developments (including micro-renewables and decentralised energy) subject to assessment of impacts on amenity, landscape, biodiversity, air/water quality, and Green Belt. No specific sites are allocated.	The policy outlines general criteria for renewable & low carbon energy developments, rather than proposing activities with potential for LSEs on European or Ramsar sites.	N/A – no pathways identified	B - Policy listing general criteria for testing the acceptability/sustainability of proposals Screen out: LSEs can be objectively excluded for this policy alone and in-combination.
Residential Design and Layout	Requires all residential development (including new dwellings, conversions, and extensions) to meet high design standards, protect character and amenity, and comply with national guidance. Includes criteria for tall buildings, subdivision of dwellings, internal space standards, and amenity space provision.	A general policy which sets out design criteria for residential development. The policy could not lead to any LSEs on European/ Ramsar sites as there are no impact pathways.	N/A – no pathways identified	B - Policy listing general criteria for testing the acceptability/sustainability of proposals Screen out: LSEs can be objectively excluded for this policy alone and in-combination.
Retail	Defines the retail hierarchy, supports vitality and viability of town centres, allows intensification and redevelopment within existing centres, and sets criteria for shop fronts and active frontages.	The policy primarily relates to the location and mix of retail and town centre uses within existing urban areas. While it supports intensification and redevelopment, these changes occur within established town centres and no new pathways to European or Ramsar sites will be created which could lead to LSEs.	N/A – no pathways identified	B - Policy listing general criteria for testing the acceptability/sustainability of proposals Screen out: LSEs can be objectively excluded for this policy alone and in-combination.
Social and Community Uses	Protects existing social and community facilities, sets criteria for redevelopment or change of use, and supports new or enhanced facilities as part of significant development proposals.	The policy outlines criteria for retaining, enhancing, or providing social and community facilities, rather than proposing activities with potential for LSEs on European or Ramsar sites.	N/A – no pathways identified	A – General statement of policy/general aspiration B – Policy listing general criteria for testing the acceptability/sustainability of proposals Screen out: LSEs can be objectively excluded for this policy alone and in-combination.



Policy	Policy Summary	Assessment of LSE alone	In-combination assessment	Pre-screening category and outcome
Sustainable Transport and Travel	Seeks to locate development where sustainable travel is realistic, require integrated transport systems, promote walking, cycling, public transport, and reduce reliance on private vehicles. Supports infrastructure improvements and requires Travel Plans for major developments.	The policy aims to reduce car dependency and emissions. This policy should support a reduction in traffic volumes in the District. In addition, development as a result of this policy will not occur within any catchments which connect hydrologically to European/Ramsar sites. Therefore, there are no feasible pathways to connect development as a result of this policy to European/Ramsar sites.	N/A – no pathways identified	B - Policy listing general criteria for testing the acceptability/sustainability of proposals Screen out: LSEs can be objectively excluded for this policy alone and in-combination.
Trees, Woodlands, hedgerows and Landscaping	Requires development proposals to retain and protect existing trees, woodlands, and hedgerows, and provide landscaping that enhances biodiversity and local character. Refuses development that would result in loss or deterioration of protected woodland or veteran trees.	The policy outlines general criteria for safeguarding and enhancing trees and habitats. There are no specific measures within the policy that could impact upon European and Ramsar sites.	N/A – no pathways identified	E – Policies or proposals which steer change in such a way as to protect listed or proposed European and Ramsar sites from adverse effects. Screen out: LSEs can be objectively excluded for this policy alone and in-combination.
Vision and Strategic Objectives	Sets out the overarching vision for the Three Rivers and strategic objectives to deliver sustainable development, including housing, economic growth, infrastructure, climate action, heritage conservation, and green infrastructure.	A high-level policy which provides context for other policies but is not likely to result in LSE on European or Ramsar sites alone.	N/A – no pathways identified	A - General statement of policy/general aspiration Screen out: LSEs can be objectively excluded for this policy alone and in-combination.
Warner Bros.	Allocates land for expansion of Warner Bros. Studios and associated uses, safeguarding sites for studio operations and visitor facilities.	The policy proposes significant development on greenfield land within the Green Belt. Development is expected to result in increases in traffic volumes, however the site is located a sufficient distance away from any European and Ramsar sites, that no LSEs are feasible. In addition, there are no feasible hydrological pathways to European and Ramsar sites as impacts would be anticipated within the catchment which does not include European/Ramsar sites.	N/A – no pathways identified	K – Policy or proposal unlikely to have a significant effect either alone or in-combination. Screen out: LSEs can be objectively excluded for this policy alone and in-combination.
Waste Management and Recycling	Requires new development to provide waste and recycling facilities, integrate storage into design, and submit Site Waste Management Plans for major schemes. Encourages reuse of materials and circular economy principles.	The policy outlines general criteria for waste and recycling provision and construction waste management. Its purpose is to reduce waste and environmental impacts. There are no specific measures within the policy that could impact upon European and Ramsar sites.	N/A – no pathways identified	B - Policy listing general criteria for testing the acceptability/sustainability of proposals Screen out: LSEs can be objectively excluded for this policy alone and in-combination.
Waterways	Protects and enhances waterways, supports water-dependent uses, and sets criteria for moorings, marinas, and facilities for water-based leisure as part of major development schemes.	The policy could enable development such as permanent moorings, marinas, and water-based leisure facilities adjacent to waterways. There are no feasible hydrological pathways to European and Ramsar sites as impacts would be anticipated within the catchment which does not include European/Ramsar sites.	N/A – no pathways identified	K – Policy or proposal unlikely to have a significant effect either alone or in-combination. Screen out: LSEs can be objectively excluded for this policy alone and in-combination.



3.4.2 Assessment of Housing Site Options

There are 54 housing sites included within the TRDLP. The sites are listed below:

- AB18: Garage Courts Parsonage Close;
- AB26: Garage Tibbs Hill Road;
- AB31: Garages Jacketts Field;
- AB39: Garages Rosehill Gardens;
- ACFS9b: Little How Croft, Abbots Langley;
- CFS26c: West of the Kings Langley Estate;
- CFS3: Land adjacent to Fraser Crescent and Woodside Road;
- CFS4: Land at Warren Court, Woodside Road;
- CFS6: Land at Mansion House Equestrian Centre;
- CFS7: Land South of the M25;
- H6: Hill Farm Industrial Estate, Leavesden;
- PCS21: Land at Love Lane;
- CFS56: Church Hill Road, Bedmond;
- NSS2: 56 High Street;
- NSS6a: North Cott East Lane;
- CFS13: Land at Oxhey Lane, Watford Heath;
- CFS14: Land north of Oxhey Lane, Carpenders Park;
- NCFS11: Grange Wood;
- ACFS1: Heath House Rickmansworth Road;
- CFS15: Alabama and Waverley, Chenies Road;
- CFS16: Land at Chorleywood Station;
- CFS18: Hill Farm, Stag Lane;
- CFS72: Land off Solesbridge Lane, Chorleywood;
- CW9: Garages at Copmans Wick;
- NCFS15: Chorleywood Library;
- NCFS17 : North Hill Farm;
- NSS23: Chorleywood Telephone Exchange Shire Lane;
- CFS20: Land at Croxley Station Watford Road;
- CFS61: Cinnamond House Cassiobridge;
- CG47: Garages off Grove Crescent;
- CG65: British Red Cross Community Way (Land at Barton Way);
- NCFS21: Land south of Scots Hill;
- CFS65: Land north of Bucknalls Lane;



- ACFS8b: Flower House 2-3 Station Road;
- NCFS20: Lonsdale, Hyde Lane;
- NSS10: Land at Mill Place, Hunton Bridge;
- NSS20: Land adj. RES site, Egg Farm Lane;
- EOS12.2: Land to the west and south of Maple Cross (combined sites);
- EOS12.3: Land to the north of Chalfont Road, Maple Cross;
- MC11: Garages rear of Longcroft Road;
- EOS7.0: Land to the south of Shepherds Lane and east of the M25;
- H15: Garages rear of Drillyard, West Way;
- P4a: Quickwood Close Garages;
- RW31: Garden land off Uxbridge Road;
- PCS16: Vivian Gardens;
- ACFS13b: Land at Hampermill Lane (Larger Site);
- CFS60: Affinity Water Depot, Church Street, Rickmansworth;
- ACFS10: Andrews Ley Farm, Harefield Road, Rickmansworth;
- CFS59: Land on London Road (care home);
- H17: Former Police Station Rectory Road;
- H22a: Depot Stockers Farm Road;
- NCFS26: Meresworth;
- CFS47c: Adams Nurseries, Church Lane, Sarratt;
- BR20: Northwick Day Centre Northwick Road;
- CFS52a: Former Sir James Altham School (northern parcel only);
- NCFS34: Pinewood Lodge; and
- PCS18: Land south of St Josephs, South Oxhey.

Sixteen of the proposed housing site options are located within the ZoI of the Chilterns Beechwoods SAC, defined as 12.6 km from the SAC boundary, based on robust visitor survey evidence¹⁴. This ZoI reflects the distance within which residential development has the potential to contribute to increased recreational pressure on the SAC. Given the strong evidence linking residential growth within this distance to increased recreational use, and the existing high baseline of recreational impacts at the SAC, Likely Significant Effects (LSEs) cannot be excluded for the following sites alone:

- AB18: Garage Courts Parsonage Close;
- AB26: Garage Tibbs Hill Road;
- AB31: Garages Jacketts Field;

¹⁴ Footprint Ecology (2022) A review of sustainable visitor numbers at Burnham Beeches. Available at: [Liley et al. - 2022 - A review of sustainable visitor numbers at Burnham.pdf](#) [Accessed: 15/01/2026].



- AB39: Garages Rosehill Gardens;
- ACFS9b: Little How Croft, Abbots Langley;
- CFS26c: West of the Kings Langley Estate;
- CFS6: Land at Mansion House Equestrian Centre;
- CFS7: Land South of the M25;
- PCS21: Land at Love Lane;
- CFS56: Church Hill Road, Bedmond;
- NSS2: 56 High Street;
- NSS6a: North Cott East Lane;
- NCFS11: Grange Wood;
- ACFS8b: Flower House 2-3 Station Road;
- NSS20: Land adj. RES site, Egg Farm Lane; and
- CFS47c: Adams Nurseries, Church Lane, Sarratt.

Housing site options located beyond 12.6 km from the SAC boundary are not considered likely to contribute materially to recreational pressure on the Chilterns Beechwoods SAC. Visitor survey evidence demonstrates a sharp decline in visitor origin distances beyond this threshold, and sites further afield lack strong functional recreational linkages to the SAC.

In addition, there are no hydrological pathways linking these sites to the SAC; air quality effects are not considered significant at these distances for the qualifying features of the SAC. Therefore, LSEs can be excluded for housing site options located outside the Zol, both alone and in-combination, and these sites are screened out of further assessment.

The closest European site is Burnham Beeches SAC, located approximately 7.8 km from the TRDLP boundary. The evidence base supporting the HRA for Burnham Beeches SAC identifies a recreational buffer of 5.6km where there is a presumption against development. As there is no spatial overlap between this buffer and the TRDLP boundary, the housing site options are not anticipated to result in increased recreational pressure, physical damage, disturbance or associated secondary effects on the SAC. Burnham Beeches SAC can therefore be screened out, both alone and in-combination.

The South West London Waterbodies SPA and Ramsar site is designated for its internationally important assemblages of wintering waterbirds, including Gadwall and Shoveler, which are supported by a complex of large reservoirs and former gravel pits connected primarily to the River Thames system. Although the River Colne flows through the Three Rivers District and ultimately joins the River Thames upstream of the designated site, the proposed housing site options would not result in changes to hydrology or water quality at a scale capable of affecting the SPA/Ramsar site. The designated waterbodies are located approximately 14.3 km downstream of the district boundary, and any potential effects arising from development would be subject to substantial dilution, attenuation and regulatory control within the wider river system.

Listed or proposed European and Ramsar sites located further afield lack credible pathways for effect, either through recreational access, hydrological changes, turbidity, siltation and waterborne pollution, and are located outside relevant Zols. Therefore, LSEs on these European or Ramsar sites can be excluded, both alone and in-combination, as a result of the proposed housing site options within the TRDLP boundary.



3.4.3 Assessment of Employment Site Options

There are 19 employment sites included within the TRDLP. These are:

- CFS11 – Carpenders Park Farm, Oxhey Lane;
- PCS2 – East Carpenders Park;
- CFS28 – Land at Gypsy Lane, Hunton Bridge;
- CFS70 – Croxley Business Park;
- CFS55 – Land at Station Road, Kings Langley;
- OSPF6 – Land West of Leavesden Aerodrome, Hunton Bridge;
- CFS32 – Land at Lynsters Farm, Maple Cross;
- CFS36 – Land at Junction 17 of M25;
- NSS1 – 1 Denham Way, Maple Cross;
- CFS39B – Land to the east of Merchant Taylors School;
- NCFS5 – Land off Bedmond Road;
- NCFS35 – Land south of Chalfont Lane;
- CFS24 – South West Junction 20 of the M25;
- E(a) – Croxley Business Park;
- E(b) – Tolpits Lane;
- E(d) – Maple Cross/Maple Lodge, warehousing;
- E(e) – Kings Langley Employment Area;
- E(f) – Leavesden Park, offices; and
- WB – Warner Bros Studios.

No proposed employment sites are located within, or adjacent to, any European or Ramsar sites. No direct habitat loss, fragmentation or loss of functionally linked land would occur. Employment sites are not anticipated to give rise to increased recreational access, impacts associated with physical damage, increased disturbance and the spread of invasive non-native species can be excluded.

Burnham Beeches SAC, Chilterns Beechwoods SAC, Wormley–Hoddesdonpark Woods SAC, Richmond Park SAC, and Windsor Forest and Great Park SAC are located in separate river catchments and lack hydrological connectivity with the employment site options. Accordingly, hydrological changes, turbidity, siltation and waterborne pollution can be excluded, and LSEs on these sites can be ruled out, both alone and in combination.

The South West London Waterbodies SPA and Ramsar site is located approximately 14.3 km downstream of the TRDLP boundary, within the wider Colne catchment. Employment sites would not result in changes to water levels, flows or water quality at a magnitude capable of affecting the qualifying features of the designated site. There are no proposals for direct abstraction or discharge, surface water runoff will be managed through sustainable drainage systems, and wastewater will be treated at existing wastewater treatment works operating within permitted limits. Given the distance downstream, the managed nature of the designated waterbodies, the scale and distribution of employment development, there is no credible pathway for adverse effects on the South West London Waterbodies SPA/Ramsar site. LSEs can therefore be excluded, either alone or in combination, and the site is not considered further in the assessment.



3.5 Screening Findings

The HRA Stage 1: Screening has not identified any potential impact pathways arising from the development of employment sites or the Local Plan policies. Potential impact pathways have been identified in relation to the development of sixteen housing sites as a result of their location within the Zol for the Chilterns Beechwoods SAC. LSEs can therefore not be ruled out for the following sites:

- AB18: Garage Courts Parsonage Close
- AB26: Garage Tibbs Hill Road
- AB31: Garages Jacketts Field
- AB39: Garages Rosehill Gardens
- ACFS9b: Little How Croft, Abbots Langley
- CFS26c: West of the Kings Langley Estate
- CFS6: Land at Mansion House Equestrian Centre
- CFS7: Land South of the M25
- PCS21: Land at Love Lane
- CFS56: Church Hill Road, Bedmond
- NSS2: 56 High Street
- NSS6a: North Cott East Lane
- NCFS11: Grange Wood
- ACFS8b: Flower House 2-3 Station Road
- NSS20: Land adj. RES site, Egg Farm Lane
- CFS47c: Adams Nurseries, Church Lane, Sarratt

3.6 Screening Conclusions

Following a review of the TRDLP, potential impact pathways have been ruled out for all European and Ramsar sites included within this report except for the Chilterns Beechwoods SAC. It was identified that the development of some sites within the Chilterns Beechwoods Zol could undermine the Site's COs identified in Section 3.5 and therefore LSEs cannot be excluded. The next step in the HRA process, AA, must be undertaken.



4.0 Appropriate Assessment

4.1 Introduction

This section presents the AA, which involves further evaluation of the potential pathways for the Local Plan alone and in combination with other plans and projects. This stage follows on from the screening stage and aims to examine those identified LSEs on European or Ramsar sites in more detail, the adverse effects on the integrity of the site and its COs. If there is no potential for the COs to be undermined, an adverse effect can be ruled out. Each potential impact pathway identified in screening as requiring further investigation is considered in turn within this section.

4.1.1 Physical damage or degradation of habitats and increased disturbance

The screening stage identified that the TRDLP has the potential to lead to LSEs on the Chilterns Beechwoods SAC due to increased levels of recreation as a result of residential development within Three Rivers. These effects include direct damage to sites through fire, vandalism, littering, trampling, grazing and erosion. In addition, recreation can cause increased disturbance to the SAC and its qualifying species, which may result in a change in behaviour of species from usual routines. Changes in traffic behaviour can also lead to disturbance.

4.1.2 Potential Effect Alone

Some European and Ramsar sites have an established ZOI informed by targeted visitor surveys, within which increases in population would be expected to result in adverse effects on site integrity. ZOIs are specific to each European or Ramsar site (and often to specific component sites of a European and Ramsar sites) and as such it is not always appropriate to apply a generic or non-specific ZOI to a European and Ramsar sites. ZOIs are a guide of average distance travelled to a European and Ramsar sites; it is acknowledged that individuals may travel further than this distance. Typically, within the ZOI, existing pressures are already having an adverse effect on the integrity of the relevant site, and any new residential development would therefore contribute to this 'in combination' effect even if it would not have such an effect on its own. However, new residential developments outside the ZOI would not usually contribute to this in combination effect as the Site is beyond the distance typically travelled locally for recreation.

The *Chiltern Beechwoods* SAC policy within the TRDLP outlines that there is a 12.6km ZOI surrounding the SAC. This is based on information outlined within the visitor survey, recreation impact assessment and mitigation requirements for the *Chiltern Beechwoods* SAC and the Dacorum Local Plan, produced by Footprint Ecology¹⁵. A small area to the north of the TRDLP boundary falls within the ZOI, and there is a requirement for development within the ZOI to produce a HRA. TRDC have set a threshold of 100 dwellings or more based on advice from Natural England, outlined below:

"The evidence suggested that Three Rivers District Council contributed less than 2% of visits to the SAC. As a result, they were not included as part of the strategic solution (where mitigation is required for all developments resulting in a net increase in dwellings). However, it is noted that some of the proposed allocated sites are within the Zone of Influence (Chilterns Beechwoods Special Area of Conservation). For larger developments that fall

¹⁵ Footprint Ecology (2022) Dacorum Recreation Evidence Base. Available at: <https://www.dacorum.gov.uk/docs/default-source/strategic-planning/dacorum-recreation-evidence-base-200322.pdf> [Accessed 15/01/2026]



within the ZOI and result in a net increase of more than 100 dwellings we recommend further consultation with Natural England to determine the recreational impacts and any requirement for mitigation measures”.

In total, 937 dwellings have been allocated within the ZOI. The site options and the number of dwellings allocated to these sites have been outlined in **Table 4-1**. Three of the site options (indicated in bold text in the table below) would deliver 100 or more dwellings. According to the *Chiltern Beechwoods* SAC policy, these sites will be required to deliver suitable mitigation and / or avoidance measures in order to address potential adverse effects arising from increased recreational disturbance. The remaining thirteen sites have allocated less than 100 dwellings; therefore, no actions are required.

Table 4-1: Housing site options and proposed number of dwellings

Housing site options	Number of Dwellings
AB18: Garage Courts Parsonage Close	5
AB26: Garage Tibbs Hill Road	5
AB31: Garages Jacketts Field	9
AB39: Garages Rosehill Gardens	6
ACFS9b: Little How Croft, Abbots Langley	35
<u>CFS26c: West of the Kings Langley Estate</u>	<u>400</u>
CFS6: Land at Mansion House Equestrian Centre	98
CFS7: Land South of the M25	20
PCS21: Land at Love Lane	46
<u>CFS56: Church Hill Road, Bedmond</u>	<u>102</u>
NSS2: 56 High Street	20
NSS6a: North Cott East Lane	16
NCFS11: Grange Wood	50
ACFS8b: Flower House 2-3 Station Road	10
<u>NSS20: Land adj. RES site, Egg Farm Lane</u>	<u>100</u>
CFS47c: Adams Nurseries, Church Lane, Sarratt	15
Total Dwellings	937

The TRDCLP Policy *Chiltern Beechwoods* SAC provides mitigation for the impacts of increased levels of recreation resulting from development within the Chilterns Beechwoods ZOI.

It can be determined that thirteen sites within the ZOI where fewer than 100 dwellings have been allocated will not result in LSEs on the Chiltern Beechwoods SAC, as a result of the wording of the TRDCLP Policy *Chiltern Beechwoods* SAC. The policy states that development proposals which will result in a net increase in less than 100 units, or more are not likely to have a significant effect on the Chilterns Beechwoods SAC. This statement is supported by Natural England who have not included the TRDC within the strategic solution (where mitigation is required for all developments resulting in a net increase in dwellings). Action is therefore only required for sites where more than 100 dwellings have been allocated; therefore, it can be concluded that no LSEs will result from those sites where fewer than 100 dwellings have been allocated.



For the three sites included within the TRDLP which include development over 100 dwellings within the Zol, this policy requires, where development proposals are subject to a HRA, they include the provision, improvement and/or maintenance of Suitable Alternative Natural Greenspace (SANG) or a suitable financial contribution. This mitigation is deemed sufficient to mitigate against the potential increase in recreation at the Chilterns Beechwoods SAC. This mitigation has been suggested, and therefore deemed sufficient by Natural England. It can therefore be concluded that mitigation is sufficient to determine that there will be no LSEs arising from the development of the following sites:

- CFS26c: West of the Kings Langley Estate
- CFS56: Church Hill Road, Bedmond
- NSS20: Land adj. RES site, Egg Farm Lane

No impact pathways have been identified alone, therefore in combination effects have not been considered.

4.2 Conclusion

Recreational pressure, leading to physical damage, degradation of habitats and increased disturbance, arising from the TRDLP could lead to adverse effects on the Chilterns Beechwoods SAC. Mitigation is provided by the Local Plan policy *Chilterns Beechwoods SAC*. With this mitigation in place, it can be determined that adverse effects on the integrity of the Chilterns Beechwoods SAC can be excluded from the TRDLP, alone or in combination. Therefore, there is no need for the HRA of the TRDLP to proceed to the following stage.





Appendix A Relevant Legislation, Policy, Case Law and Guidance

Three Rivers Local Plan

Habitats Regulations Assessment

Three Rivers District Council

SLR Project No.: 430.000113.00001

16 January 2026

A.1 Legislation

A.1.1 The Habitats Regulations

The requirement for the HRA is set out within Article 6 of the Habitats Directive 92/43/European Economic Community (EEC) of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora. This has been transposed into British law by the Conservation of Habitats & Species Regulations 2017 (as amended), also known as the 'Habitats Regulations'.

The Habitats Regulations afford protection to European sites and their interest features. Part 6 of the Conservation of Habitats and Species Regulations 2017 (as amended) sets out the requirements for screening assessments, the circumstances under which an Appropriate Assessment (AA) is required and the further implementation of Article 6(3) and 6(4) of the Habitats Directive.

The UK left the European Union (Brexit) on Exit Day, 31st January 2020, followed by Completion Day on 31st December 2020. The EU Exit Regulations (2019) establish any EU Exit-related changes to the Habitats Regulations (2017), with these considered to have no material implications on the requirement or process for a HRA of a Plan. After Brexit, UK sites designated under the Habitats Regulations became part of the National Site Network (as defined in the interpretation sections of the Habitat Regulations (2017)), with a focus on maintaining ecological coherence throughout the UK.

A.1.2 The Environment Act (2021)

The Environment Act passed into UK law in 2021 to protect and enhance the environment for future generations. The Act sets legally binding targets to halt the decline in species by 2030, require new developments to improve or create habitats and deliver interim Environmental Improvement Plans, including interim targets. In 2018, the 25 Year Environment Plan¹⁶ set out government actions to help the natural world regain and retain good health through ten goals. This plan was reviewed and refreshed in 2023, in line with the Environment Act 2021, to produce the Environmental Improvement Plan¹⁷ and reinforces the vision and sets out the plan to deliver against the ten goals. The apex goal, **Goal 1**: Thriving plants and wildlife, is supported by the other nine goals:

- **Goal 2:** Clean air;
- **Goal 3:** Clean and plentiful water;
- **Goal 4:** Managing exposure to chemicals and pesticides;
- **Goal 5:** Maximise our resources, minimise our waste;
- **Goal 6:** Using resources from nature sustainably;
- **Goal 7:** Mitigating and adapting to climate change;
- **Goal 8:** Reduced risk of harm from environmental hazards;
- **Goal 9:** Enhancing biosecurity; and

¹⁶ HM Government (2018) A Green Future: Our 25 Year Plan to Improve the Environment. Available at: <https://assets.publishing.service.gov.uk/media/5ab3a67840f0b65bb584297e/25-year-environment-plan.pdf> [Accessed: 20/12/2025].

¹⁷ HM Government (2023) Environmental Improvement Plan 2023 First revision of the 25 Year Environment Plan. Available at: <https://assets.publishing.service.gov.uk/media/64a6d9c1c531eb000c64ffa/environmental-improvement-plan-2023.pdf> [Accessed: 20/12/2025].



- **Goal 10:** Enhanced beauty, heritage, and engagement with the natural environment.

A.2 Policy

A.2.1 National Planning Policy Framework (2024)

In addition to the Habitats Regulations, UK Government policy (Office of the Deputy Prime Minister Circular 06/2005) states that internationally important wetlands designated under the Convention on Wetlands 1971, called the Ramsar Convention (Ramsar sites) are afforded the same protection as SPAs and SACs for the purpose of considering development proposals that may affect them. The Government also affords the same level of protection to potential SPAs (pSPAs), possible SACs (pSACs) and proposed Ramsar sites and to sites identified, or required, as compensatory measures for adverse effects on any of the above sites, through planning policy such as the National Planning Policy Framework¹⁸.

Paragraphs 194 and 195 relate to European and Ramsar sites and state:

“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.*

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.”

A.3 Case Law

A.3.1 C-323/17 People Over Wind

In April 2018, the judgement for this case clarified that mitigation measures to avoid or reduce harmful effects on a listed or proposed European and Ramsar site(s) cannot be taken into account during the screening stage for the purposes of decision making and must instead progress through to the AA stage. This is relevant for HRAs undertaken at both the plan and project level.

A.3.2 C-164/17 Grace and Sweetman

In July 2018, the judgement for this case clarified the distinction between mitigation and compensation in relation to HRA. *“It is only when it is sufficiently certain that a measure will make an effective contribution to avoiding harm, guaranteeing beyond all reasonable doubt that the project will not adversely affect the integrity of the area, that such a measure may be taken into consideration when the appropriate assessment is carried out. ...As a general rule, any positive effects of the future creation of a new habitat, which is aimed at compensating for the loss of area and quality of that habitat type in a protected area, are highly difficult to forecast with any degree of certainty or will be visible only in the future.”*

¹⁸ Department for Levelling Up, Housing & Communities (2024) National Planning Policy Framework. Available at: https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf [Accessed: 20/12/2025].



Therefore, they can only be taken into account following the AA stage and passing of the three tests at the Derogations stage.

A.3.3 C-293/17 and C-294/17 Dutch Nitrogen cases

In November 2018, the judgement for these joined cases clarified that *“it is only when it is sufficiently certain that a measure will make an effective contribution to avoiding harm to the integrity of the site concerned, by guaranteeing beyond all reasonable doubt that the plan or project at issue will not adversely affect the integrity of that site, that such a measure may be taken into consideration in the ‘appropriate assessment’”* and *“The appropriate assessment of the implications of a plan or project for the sites concerned is not to take into account the future benefits of such ‘measures’ if those benefits are uncertain, inter alia because the procedures needed to accomplish them have not yet been carried out or because the level of scientific knowledge does not allow them to be identified or quantified with certainty.”*

A.3.4 C-461/17 Holohan v An Bord Pleanála

In November 2018, the judgement for this case clarified that an AA must consider the listed or proposed European and Ramsar site and its qualifying features as well as the implications of the proposed project *“for habitat types and species to be found outside the boundaries of that site, provided that those implications are liable to affect the conservation objectives of the site.”* It also clarified that *“where the competent authority rejects the findings in a scientific expert opinion recommending that additional information be obtained, the ‘appropriate assessment’ must include an explicit and detailed statement of reasons capable of dispelling all reasonable scientific doubt concerning the effects of the work envisaged on the site concerned.”*

A.3.5 EWHC 351 Wealden District Council v Secretary of State for Communities And Local Government & Ors 2017 (Admin)

In March 2017, the judgement for this case clarified that it requires an in-combination assessment considering the effects of other projects, which in this case resulted in an exceedance of the 1,000 Annual Average Daily Traffic threshold.

A.4 Guidance

A.4.1 Managing Natura 2000 Sites – the Provisions of Article 6 of the ‘Habitats’ Directive 92/43/EEC (2018)¹⁹

The European Commission has produced a document which aims at providing guidelines to the Member States on the interpretation of certain key concepts used in Article 6 of the Habitats Directive.

A.4.2 Government guidance – Appropriate assessment: Guidance on the use of Habitats Regulations Assessment (2019)²⁰

UK government guidance has been published on the use of HRA and AA. It provides further agreement in light of the People Over Wind Case (Section A.3.1) and clarification on

¹⁹ European Commission (2018) Managing Natura 2000 sites – The provisions of Article 6 of the Habitats Directive 92/43/EEC. Available at: <https://op.europa.eu/en/publication-detail/-/publication/caf47cb6-207a-11e9-8d04-01aa75ed71a1/language-en> [Accessed: 20/12/2025].

²⁰ Ministry of Housing, Communities and Local Government, Ministry of Housing, Communities & Local Government (2018 to 2021) and Department for Levelling Up, Housing and Communities (2019) Guidance



features that are integral to the design or physical characteristics of the project that is being assessed. These may include the layout, timing and location of a scheme, which may be considered at the screening stage.

A.4.3 European Commission guidance – Assessment of plans and projects in relation to Natura 2000 sites – Methodological Guidance on the Provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC (2021)²¹

The European Commission has provided a methodological guidance document on the application of Article 6(3) and (4) of the Habitats Directive to assist authorities and national agencies in the Member States and in candidate countries, as well as developers, consultants, site managers, practitioners and other stakeholders in the application of obligations stemming from these provisions.

A.4.4 Assessment of plans and projects in relation to Natura 2000 sites (2022)²²

The European Commission supports a broad interpretation of the terms 'plan' and 'project' in the implementation of Article 6(3). The term 'plan' includes land-use or spatial plans and sectoral plans (e. g. for transport, energy, water management) and includes National Policy Statements. Implicit in the Habitats Directive is the application of the precautionary principle, i.e. that absence of scientific evidence on the significant negative effect of an action cannot be used as justification for approval of this action. The emphasis of the assessment should thus be on objectively demonstrating, with supporting evidence, following the three stages.

A.4.5 Government guidance – Habitats regulations assessments: Protecting a European site (2023)²³

This guidance outlines how a competent authority must decide if a plan or a project that affects a European site can go ahead. The HRA principles and process is outlined in full detail.

Appropriate assessment Guidance on the use of Habitats Regulations Assessment. Available at: <https://www.gov.uk/guidance/appropriate-assessment> [Accessed: 20/12/2025].

²¹ European Commission: Directorate-General for Environment (2021) Assessment of plans and projects in relation to Natura 2000 sites – Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC. Available at: <https://op.europa.eu/en/publication-detail/-/publication/99a99e59-3789-11ec-8daf-01aa75ed71a1/language-en> [Accessed 20/12/2025].

²² European Commission: Directorate-General for Environment (2022) Guidance document on assessment of plans and projects in relation to Natura 2000 sites – A summary. Available at: <https://data.europa.eu/doi/10.2779/086397> [Accessed: 20/12/2025].

²³ Department for Environment, Food & Rural Affairs, Natural England, Welsh Government, and Natural Resources Wales (2023) Guidance Habitats regulations assessments: protecting a European site. Available at: <https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site> [Accessed: 20/12/2025].



A.4.6 Government guidance – Nationally Significant Infrastructure Projects: Advice on Habitats Regulations Assessments (2024)²⁴

Guidance has been published online to summarise the applicant and decision maker obligations under the Habitats Regulations in the context of NSIPs. This refers to the guidance and the stages outlined in Appendix A.4.3.

A.4.7 The Habitats Regulations Assessments Handbook (2024)²⁵

The Handbook has two principal objectives to:

- Improve the understanding and interpretation of the Habitats Regulations; and
- Aid consistency in applying their requirements in respect of plans and projects.

Part F in particular has been referred to in the preparation of this HRA as it provides practical guidance for the assessment of plans under the Regulations.

²⁴ Planning Inspectorate (2025) Guidance Nationally Significant Infrastructure Projects: Advice on Habitats Regulations Assessments. Available at: <https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-advice-on-habitats-regulations-assessments> [Accessed: 20/12/2025].

²⁵ Tyldesley, D. and Chapman, C. (2013) The Habitats Regulations Handbook, November 2024 edition UK: DTA Publications Limited.





Appendix B Information on European and Ramsar Sites

Three Rivers District Local Plan

Habitats Regulations Assessment

Three Rivers District Council

SLR Project No.: 430.000113.00001

16 January 2026

B.1 European and Ramsar Sites within 20 km of the TRDLP Boundary

Chilterns Beechwoods SAC (UK0012724)	
Location in relation to plan area	8 km to the west of the Local Plan Area.
Reason(s) for designation ²⁶ :	
Habitats: <ul style="list-style-type: none"> • H6210 Semi-natural dry grasslands and scrubland facies: on calcareous substrates (<i>Festuco-Brometalia</i>), (note that this includes the priority feature 'important orchid rich sites'). • H9130 <i>Asperulo-Fagetum</i> beech forests. • Species: • S1083 Stag beetle, <i>Lucanus cervus</i> 	
SSSI component sites	Ashridge Commons and Woods SSSI; Aston Rowant Woods SSSI; Bisham Woods SSSI; Bradenham Woods, Park Wood & The Coppice SSSI; Ellesborough and Kimble Warrens SSSI; Hollowhill and Pullingshill Woods SSSI; Naphill Common SSSI; Tring Woodlands SSSI; Windsor Hill SSSI.
Key current and predicted issues ²⁷	<ul style="list-style-type: none"> • Invasive non-native species; • Problematic native species; • Interspecific floral relations; and • Forest and Plantation management and use.
Conservation Objectives ²⁸	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 <u><i>maintaining or restoring</i></u> ; <ul style="list-style-type: none"> • 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.

²⁶ Natural England (2019) European Site Conservation Objectives: Supplementary advice on conserving and restoring site features Chilterns Beechwoods Special Area of Conservation (UK0012724). Available at: <https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0012724.pdf> [Accessed 15/01/2026]

²⁷ JNCC (2015) NATURA 2000 - Standard Data Form Chilterns Beechwoods Special Area of Conservation (UK0012724). Available at: <https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0012724.pdf> [Accessed 15/01/2026]

²⁸ Natural England (2014) Chilterns Beechwoods Special Area of Conservation Conservation Objectives (UK0012724). Available at: <https://publications.naturalengland.org.uk/publication/4808896162037760> [Accessed 15/01/2026]



Burnham Beeches SAC (UK0030034)	
Location in relation to plan area	8 km to the west of the Local Plan Area.
Reason(s) for designation ²⁹ :	
Habitats:	
<ul style="list-style-type: none"> H9120 Atlantic acidophilous beech forests with <i>Ilex</i> and sometimes <i>Taxus</i> in the shrub layer (<i>Quercion robori-petraeae</i> or <i>Ilici-Fagenion</i>) 	
SSSI component sites	Burnham Beeches SSSI
Key current and predicted issues ³⁰	<ul style="list-style-type: none"> Outdoor sports and leisure activities, recreational activities; Air pollution, air-borne pollutants; Problematic native species; Other ecosystem modifications; and Changes in biotic conditions.
Conservation Objectives ³¹	<p>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 <u><i>maintaining or restoring</i></u>:</p> <ul style="list-style-type: none"> The extent and distribution of qualifying natural habitats; The structure and function (including typical species) of qualifying natural habitats; and The supporting processes on which qualifying natural habitats rely.

South West London Waterbodies Ramsar (UK11065)	
Location in relation to plan area	14 km to the south west of the Local Plan Area.
Reason(s) for designation ³² :	
Ramsar Criterion 6:	
<ul style="list-style-type: none"> Regularly supports 1% of the individuals in a population of one species or subspecies of waterbird. Over winter the site regularly supports internationally important populations of Gadwall (<i>Anas strepera</i>) and Shoveler (<i>Anas clypeata</i>). 	
SSSI component sites	Kempton Park Reservoirs SSSI; Knight & Bessborough Reservoirs SSSI; Staines Moor SSSI; Thorpe Park No. 1 Gravel Pit SSSI; Wraysbury & Hythe End Gravel Pits SSSI; Wraysbury No. 1 Gravel Pit SSSI; Wraysbury Reservoir SSSI.

²⁹ Natural England (2019) European Site Conservation Objectives: Supplementary advice on conserving and restoring site features Burnham Beeches Special Area of Conservation (UK0030034). Available at: <https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0030034.pdf> [Accessed 15/01/2026]

³⁰ JNCC (2015) NATURA 2000 - Standard Data Form Burnham Beeches Special Area of Conservation (UK0030034). Available at: <https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0030034.pdf> [Accessed 15/01/2026]

³¹ Natural England (2018) Burnham Beeches Special Area of Conservation Conservation Objectives (UK0030034). Available at: <https://publications.naturalengland.org.uk/publication/6014456282742784> [Accessed 15/01/2026]

³² JNCC (1994) Information Sheet on Ramsar Wetlands South West London Waterbodies. Available at: <https://jncc.gov.uk/jncc-assets/RIS/UK11068.pdf> [Accessed 15/01/2026]



Key current and predicted issues	Vegetation succession; Water diversion for irrigation/domestic/industrial use; Recreational/tourism disturbance; and Mining exploitation/exploration.
Conservation Objectives	N/A for Ramsar sites, refer to South West London Waterbodies SPA.

South West London Waterbodies SPA (UK9012171)	
Location in relation to plan area	14 km to the south west of the Local Plan Area.
Reason(s) for designation ³³ :	
<p>Species:</p> <ul style="list-style-type: none"> • A051 Gadwall, <i>Mareca strepera</i> • A056 Shoveler, <i>Spatula clypeata</i> <p>Qualifies as internationally important because it regularly supports more than 1% of the Northwestern/Central European population of Shoveler and Gadwall during the non-breeding season.</p>	
SSSI component sites	Kempton Park Reservoirs SSSI; Knight & Bessborough Reservoirs SSSI; Staines Moor SSSI; Thorpe Park No. 1 Gravel Pit SSSI; Wraysbury & Hythe End Gravel Pits SSSI; Wraysbury No. 1 Gravel Pit SSSI; Wraysbury Reservoir SSSI.
Key current and predicted issues ³⁴	<ul style="list-style-type: none"> • Marine and Freshwater aquaculture; • Outdoor sports and leisure activities, recreational activities; • Invasive non-native species; • Abiotic (slow) natural processes; and • Changes in biotic conditions.
Conservation Objectives ³⁵	<p>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 <u><i>maintaining or restoring</i></u>:</p> <ul style="list-style-type: none"> • 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.

³³ Natural England (2019) European Site Conservation Objectives: Supplementary advice on conserving and restoring site features South West London Waterbodies Special Protection Area (UK9012171). Available at: <https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK9012171.pdf> [Accessed 15/01/2026]

³⁴ JNCC (2015) NATURA 2000 - Standard Data Form South West London Waterbodies Special Protection Area. Available at: <https://jncc.gov.uk/jncc-assets/SPA-N2K/UK9012171.pdf> [Accessed 15/01/2026]

³⁵ Natural England (2019) South West London Waterbodies Special Protection Area Conservation Objectives (UK9012171). Available at: [UK9012171-South-West-London-Waterbodies-SPA-V2019.pdf](https://designatedsites.naturalengland.org.uk/ConservationObjectives/UK9012171-South-West-London-Waterbodies-SPA-V2019.pdf) [Accessed 15/01/2026]



Windsor Forest and Great Park SAC (UK0012586)	
Location in relation to plan area	16 km to the south west of the Local Plan Area.
Reason(s) for designation ³⁶ :	
Habitats: <ul style="list-style-type: none"> • H9120 Atlantic acidophilous beech forests with <i>Ilex</i> • H9190 Old acidophilous oak woods with <i>Q. robur</i> on sandy plains Species: <ul style="list-style-type: none"> • S1079 Violet click beetle, <i>Limoniscus violaceus</i> 	
SSSI component sites	Windsor Forest and Great Park SSSI
Key current and predicted issues ³⁷	<ul style="list-style-type: none"> • Forest and Plantation management and use; • Air pollution, air-borne pollutants; • Invasive non-native species; and • Interspecific floral relations.
Conservation Objectives ³⁸	<ul style="list-style-type: none"> • 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.

Richmond Park SAC (UK0030246)	
Location in relation to plan area	19 km to the south of the Local Plan Area.
Reason(s) for designation ³⁹ :	
Species: <ul style="list-style-type: none"> • S1083 Stag beetle, <i>Lucanus cervus</i> 	
SSSI component sites	Richmond Park SSSI

³⁶ Natural England (2019) European Site Conservation Objectives: Supplementary advice on conserving and restoring site features Windsor Forest and Great Park Special Area of Conservation (UK0012586). Available at: <https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0012586.pdf> [Accessed 15/01/2026]

³⁷ JNCC (2015) NATURA 2000 - Standard Data Form Windsor Forest and Great Park Special Area of Conservation (UK0012586). Available at: <https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0012586.pdf> [Accessed 15/01/2026]

³⁸ Natural England (2014) Windsor Forest and Great Park Special Area of Conservation Conservation Objectives (UK0012586). Available at: <https://publications.naturalengland.org.uk/publication/5175000009015296> [Accessed 15/01/2026]

³⁹ Natural England (2019) European Site Conservation Objectives: Supplementary advice on conserving and restoring site features Richmond Park Special Area of Conservation (UK0030246). Available at: <https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0030246.pdf> [Accessed 15/01/2026]



Key current and predicted issues ⁴⁰	None identified.
Conservation Objectives ⁴¹	<p>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 <u><i>maintaining or restoring</i></u>:</p> <ul style="list-style-type: none"> • 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.

Wormley-Hoddesdonpark Woods SAC (UK0013696)	
Location in relation to plan area	19 km to the north east of the Local Plan Area.
Reason(s) for designation ⁴² :	
Habitats: <ul style="list-style-type: none"> • H9160 Sub-Atlantic and medio-European oak or oak-hornbeam forests. 	
SSSI component sites	Wormley-Hoddesdonpark Wood South SSSI; Wormley-Hoddesdonpark Woods North SSSI.
Key current and predicted issues ⁴³	<ul style="list-style-type: none"> • Air pollution, air-borne pollutants; • Invasive non-native species; • Problematic native species; • Interspecific floral relations; and • Other human intrusions and disturbances.
Conservation Objectives ⁴⁴	<p>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 <u><i>maintaining or restoring</i></u>:</p> <ul style="list-style-type: none"> • The extent and distribution of qualifying natural habitats; • The structure and function (including typical species) of qualifying natural habitats; and • The supporting processes on which qualifying natural habitats rely.

⁴⁰ JNCC (2015) NATURA 2000 - Standard Data Form Richmond Park Special Area of Conservation (UK0030246). Available at: <https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0030246.pdf> [Accessed 15/01/2026]

⁴¹ Natural England (2018) Richmond Park Special Area of Conservation Conservation Objectives (UK0030246). Available at: <https://publications.naturalengland.org.uk/publication/5279688851193856> [Accessed 15/01/2026]

⁴² Natural England (2019) European Site Conservation Objectives: Supplementary advice on conserving and restoring site features Wormley-Hoddesdonpark Woods Special Area of Conservation (UK0013696). Available at: <https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0013696.pdf> [Accessed 15/01/2026]

⁴³ JNCC (2015) NATURA 2000 - Standard Data Form Wormley-Hoddesdonpark Woods Special Area of Conservation (UK0013696). Available at: <https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0013696.pdf> [Accessed 15/01/2026]

⁴⁴ Natural England (2014) Wormley-Hoddesdonpark Woods Special Area of Conservation Conservation Objectives (UK0013696). Available at: <https://publications.naturalengland.org.uk/publication/4919819195383808> [Accessed 15/01/2026]



B.2 European and Ramsar Sites more than 20 km from the TRDLP Boundary

Lee Valley SPA (UK9012111)	
Location in relation to plan area	21 km to the south east of the Local Plan Area.
Reason(s) for designation ⁴⁵ :	
Species: <ul style="list-style-type: none"> • A021 Bittern, <i>Botaurus stellaris</i> • A051 Gadwall, <i>Mareca strepera</i> • A056 Shoveler, <i>Spatula clypeata</i> Qualifies as internationally important because it regularly supports more than 1% of the Northwestern/Central European population of Shoveler and Gadwall during the non-breeding season.	
SSSI component sites	Amwell Quarry SSSI; Rye Meads SSSI; Turnford & Cheshunt Pits SSSI; Walthamstow Reservoirs SSSI.
Key current and predicted issues ⁴⁶	<ul style="list-style-type: none"> • Marine and Freshwater aquaculture; • Outdoor sports and leisure activities, recreational activities; • Pollution to groundwater (point sources and diffuse sources); • Human induced changes in hydraulic conditions; and • Biocenotic evolution, succession.
Conservation Objectives ⁴⁷	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 <u>maintaining or restoring</u> : <ul style="list-style-type: none"> • 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.

Lee Valley Ramsar (UK11065)	
Location in relation to plan area	21 km to the south east of the Local Plan Area.
Reason(s) for designation ⁴⁸ :	

⁴⁵ Natural England (2019) European Site Conservation Objectives: Supplementary advice on conserving and restoring site features Lee Valley Special Protection Area (UK9012171). Available at: <https://publications.naturalengland.org.uk/publication/5670650798669824> [Accessed 15/01/2026]

⁴⁶ JNCC (2015) NATURA 2000 - Standard Data Form Lee Valley Special Protection Area (UK9012111). Available at: <https://jncc.gov.uk/jncc-assets/SPA-N2K/UK9012111.pdf> [Accessed 15/01/2026]

⁴⁷ Natural England (2019) Lee Valley Special Protection Area Conservation Objectives (UK9012111). Available at: <https://publications.naturalengland.org.uk/publication/5670650798669824> [Accessed 15/01/2026]

⁴⁸ JNCC (1994) Information Sheet on Ramsar Wetlands Lee Valley. Available at: <https://jncc.gov.uk/jncc-assets/RIS/UK11034.pdf> [Accessed 15/01/2026]



<p>Ramsar Criterion 2:</p> <ul style="list-style-type: none"> Supports vulnerable, endangered, or critically endangered species or threatened ecological communities, or species or communities that are rare or scarce at the national or international level. The site supports the nationally scarce plant species whorled water-milfoil <i>Myriophyllum verticillatum</i> and the rare or vulnerable invertebrate <i>Micronecta minutissima</i> (a water-boatman). <p>Ramsar Criterion 6:</p> <ul style="list-style-type: none"> Regularly supports 1% of the individuals in a population of one species or subspecies of waterbird. Over winter the site regularly supports internationally important populations of Gadwall (<i>Anas strepera</i>) and Shoveler (<i>Anas clypeata</i>). 	
SSSI component sites	Amwell Quarry SSSI; Rye Meads SSSI; Turnford & Cheshunt Pits SSSI; Walthamstow Reservoirs SSSI.
Key current and predicted issues	No factors reported.
Conservation Objectives	N/A for Ramsar sites, refer to South West London Waterbodies SPA.

Thames Basin Heaths SPA (UK9012141)	
Location in relation to plan area	24 km to the south west of the Local Plan Area.
Reason(s) for designation ⁴⁹ :	
<p>Species:</p> <ul style="list-style-type: none"> A302 Dartford warbler, <i>Sylvia undata</i> A224 Nightjar, <i>Caprimulgus europaeus</i> A246 Woodlark, <i>Lullula arborea</i> 	
SSSI component sites	Ash to Brookwood Heaths SSSI; Bourley and Long Valley SSSI; Bramshill SSSI; Broadmoor to Bagshot Woods and Heaths SSSI; Castle Bottom to Yateley and Hawley Commons SSSI; Chobham Common SSSI; Colony Bog and Bagshot Heath SSSI; Eelmoor Marsh SSSI; Hazeley Heath SSSI; Horsell Common SSSI; Ockham and Wisley Commons SSSI; Sandhurst to Owlsmoor Bogs and Heaths SSSI; Whitmoor Common SSSI.
Key current and predicted issues ⁵⁰	<ul style="list-style-type: none"> Outdoor sports and leisure activities, recreational activities; Forest and Plantation management and use; Air pollution, air-borne pollutants; Other human intrusions and disturbances; and Biocenotic evolution, succession.
Conservation Objectives ⁵¹	<p>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 <u>maintaining or restoring</u>:</p> <ul style="list-style-type: none"> The extent and distribution of the habitats of the qualifying features;

⁴⁹ Natural England (2019) European Site Conservation Objectives: Supplementary advice on conserving and restoring site features Thames Basin Heaths Special Protection Area (UK9012141). Available at: <https://publications.naturalengland.org.uk/publication/4952859267301376> [Accessed 15/01/2026]

⁵⁰ JNCC (2015) NATURA 2000 - Standard Data Form Thames Basin Heaths Special Protection Area (UK9012141). Available at: <https://jncc.gov.uk/jncc-assets/SPA-N2K/UK9012141.pdf> [Accessed 15/01/2026]

⁵¹ Natural England (2019) Thames Basin Heaths Special Protection Area Conservation Objectives (UK9012141). Available at: <https://publications.naturalengland.org.uk/publication/4952859267301376> [Accessed 15/01/2026]



	<ul style="list-style-type: none"> • 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.
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Aston Rowant SAC (UK0030082)	
Location in relation to plan area	27 km to the west of the Local Plan Area.
Reason(s) for designation ⁵² :	
Habitats: <ul style="list-style-type: none"> • H5130 <i>Juniperus communis</i> formations on heaths or calc grasslands • H9130 <i>Asperulo-Fagetum</i> beech forests 	
SSSI component sites	Aston Rowant SSSI
Key current and predicted issues ⁵³	<ul style="list-style-type: none"> • Interspecific floral relations; • Unknown threat or pressure; • Problematic native species; and • Changes in biotic conditions.
Conservation Objectives ⁵⁴	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 <u><i>maintaining or restoring</i></u> ; <ul style="list-style-type: none"> • The extent and distribution of qualifying natural habitats; • The structure and function (including typical species) of qualifying natural habitats; and • The supporting processes on which qualifying natural habitats rely.

⁵² Natural England (2019) European Site Conservation Objectives: Supplementary advice on conserving and restoring site features Aston Rowant Special Area of Conservation (UK0030082). Available at: <https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0030082.pdf> [Accessed 15/01/2026]

⁵³ JNCC (2015) NATURA 2000 - Standard Data Form Aston Rowant Special Area of Conservation (UK0030082). Available at: <https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0030082.pdf> [Accessed 15/01/2026]

⁵⁴ Natural England (2014) Aston Rowant Special Area of Conservation Conservation Objectives (UK0030082). Available at: <https://publications.naturalengland.org.uk/publication/5707034853933056> [Accessed 15/01/2026]





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