

Habitats Regulations Assessment

Draft Screening Report

Draft London Riverside Opportunity Area Planning Framework

March 2015

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1 Introduction

1.1 Draft London Riverside Opportunity Area Planning Framework

1.1.1 This Habitats Regulations Assessment (HRA) screening report has been developed to inform the draft London Riverside Opportunity Area Planning Framework (OAPF). The draft London Riverside OAPF has been prepared in the context of London Plan policies:

- 2.13 “Opportunity Areas and Intensification Areas”.
- 2.6, 2.7 and 2.8 regarding Outer London’s vision, economy and transport.
- 2.17 “Strategic Industrial Locations”.
- 3.1 “Ensuring equal life chances for all”.
- 3.3 “Increasing housing supply”.
- 4.1 “Developing London’s economy”.
- 4.4 “Managing industrial land and premises”.
- 4.12 “Improving opportunities for all”.
- 6.1, 6.2, 6.4 regarding the strategic approach to transport, public transport capacity and connectivity.
- 7.1 “Lifetime neighborhoods”.
- 7.2 “An inclusive environment”.
- 7.19 “Biodiversity and access to nature”.
- 7.25, 7.26, 7.27 and 7.29 regarding the Blue Ribbon Network and River Thames.
- 4.1 “Developing London’s economy”.
- 4.7 “Retail and town centre development”.
- 4.10 “New and emerging economic sectors”.
- 4.11 “Encouraging a connected economy”.
- 6.1 “Integrating transport and development- strategic approach”.
- 6.9 “Cycling” and,
- 6.10 “Walking”.

1.1.2 A transport study has been undertaken by Transport for London, and a development capacity study conducted in order to inform the strategies of the OAPF.

1.1.3 The main purpose of the draft London Riverside OAPF is to set out the Mayor’s strategic priorities and long term vision for the area over the next 20 years based on a comprehensive review and analysis of key strategic and local issues. Specifically, the framework sets out how the Mayor wishes to see this part of London evolve into a sustainable and successful part of the city and how it relates to the wider south-east.

1.1.4 The OAPF puts forward strategies to guide the regeneration of the area setting out how the Mayor’s planning, transport, housing and land functions can be coordinated to maximise the public benefit to Londoner’s. The framework looks at land use (housing and industry), built form and connectivity, transport and the interventions that will be needed to facilitate change.

- There are five broad objectives aimed at achieving change in London Riverside:
- A coordinated land use strategy aimed at releasing underused Strategic Industrial Land (SIL) to create new neighbourhoods with up to 26,500 new homes and 16,000 jobs, (including within the potential Housing Zone bid areas), and the designation of new SIL;
- Improved and new transport infrastructure and services to unlock development potential;

- High quality public and private realm to improve the image of the area;
 - Expediting the development of publicly owned land;
 - Maximising housing investment.
- 1.1.5 The document has seven chapters which set out the land use and transport strategies and the design principles that will deliver these objectives. As Supplementary Planning Guidance to the London Plan, the OAPF does not propose new policy. The strategies of the OAPF provide clarity on how existing policy will be applied in London Riverside and pull together the various policies and strategies of the three boroughs, indicate a direction of travel for local policy reviews.
- 1.1.6 The employment strategy is to facilitate the provision of 16,000 new jobs in the opportunity area to support the development of green industries, and to allow a limited release of surplus industrial land for other uses, mainly housing. It encourages and facilitates the consolidation and intensification of industrial districts at East Beckton, River Road and Dagenham Dock/Rainham employment areas; the designation of new Strategic Industrial Land in East Beckton and at Coldharbour in Havering, with a small reduction on Thames Road and Creekmouth. This will facilitate the expansion of the residential district west and south of Barking Town Centre and help to integrate sites along the River Roding and at Barking Riverside. The strategy envisages the extension of Rainham village west to integrate key sites on the A1306, and the establishment of a new community at South Dagenham/South Hornchurch around Beam Park. It also supports the intensification of retail uses in existing centres at Barking, Beckton, Dagenham Heathway and Rainham and in emerging centres at Barking Riverside, Chequers Corner and in the new developments along the A1306; and mixed-use developments to provide local shopping, services and employment in existing and emerging centres.
- 1.1.7 The strategy for housing and social infrastructure is to facilitate the provision of 26,500 new homes across the area in a number of locations including the Housing Zone bid areas in Barking Town Centre and Beam Park and Rainham, and other suitable sites along the A1306. These will be at densities that make the most efficient use of land bearing in mind the context of each site and the provision of social and transport infrastructure to support those homes.
- 1.1.8 The transport strategy supports the timely provision of transport infrastructure and services in order to support development in the opportunity area and to mitigate any adverse impacts on the existing transport network; and sets out the interventions necessary to facilitate development to meet new capacity demands. Along with the urban design strategy, it also considers how the issue of poor connectivity within the area can be addressed, and suggests how links can be created between new district and local centres and public transport. Key to this is the delivery of the London Overground extension to Barking Riverside, the new Thames crossings and improvements to the A13.
- 1.1.9 The urban design strategy builds on the All London Green Grid and sets out measures to improve connectivity and enhance the public realm across the area. It looks at existing urban form and gives broad indications of appropriate areas for density of future developments. For sites along the A1306, broad design principles are set out. As one of the largest housing regeneration sites in the OA, for Barking Riverside it provides a broad layout and phasing plan indicating delivery timescales.
- 1.1.10 The OAPF also identifies opportunities for decentralised energy production and the development of a satellite district-heating networks across the area that interconnect over time to supply locally produced low to zero carbon energy.

- 1.1.11 Finally, the framework outlines the phasing and delivery of infrastructure and possible delivery mechanisms. A Development Infrastructure Funding (DIF) study will be commissioned, building on the work already carried out by the boroughs and the London Thames Gateway Development Corporation when it was responsible for the area, and work done since by the GLA and TfL to secure funding.
- 1.1.12 The plan will be delivered in partnership with the London boroughs of Barking and Dagenham, Havering and Newham and the implementation chapter sets out how this will be achieved. Mechanisms for cooperation, funding and monitoring and review of the plan are considered in detail.
- 1.1.13 The OAPF does not seek to unnecessarily duplicate the policies of the London Plan or guidance set out in other SPG documents. As such the document only addresses policy areas necessary to achieve the vision and objectives set out above.
- 1.1.14 This HRA screening report provides an assessment of the draft London Riverside OAPF strategies with the view of protecting European Nature Conservation Sites.

1.2 Habitats Regulation Assessment

- 1.2.1 The Conservation of Habitats and Species Regulations 2010¹ implement the European Council Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Fauna and Flora (known as the 'Habitats Directive') in England and Wales. This Directive requires the assessment of plans and projects for their potential to effect sites of European nature conservation importance referred to as 'European sites' in this report. This requirement was enforced through amendments to the Habitat Regulations (in 2007) following a European court ruling².
- 1.2.2 The Habitats Directive and Regulations provide legal protection for the habitats and species of European importance. The Habitats Directive also established a European network of nature conservation sites known as the Natura 2000 network. These sites consist of:
- Special Areas of Conservation (SACs) - which protect habitats,
 - Special Protection Areas (SPAs) - which protect birds
 - Offshore Marine Site (OMS), and
 - RAMSAR sites which protect wetlands.

1 From 1st April 2010, this legislation updates and consolidates all the amendments to the Conservation (Natural Habitats &c) Regulations since they were first made in 1994

2 ECJ case C - 6/04, Commission of the European Communities v United Kingdom of Great Britain and Northern Ireland, 20th October 2005.

- 1.2.3 To ensure compliance with the Regulations, the draft London Riverside OAPF has been screened as to establish whether a Habitats Regulations Assessment³ is required. This report represents the findings of this first stage in this process, the Habitats Regulations Screening Assessment. The Habitats Regulations Screening Assessment will determine whether the strategies of the draft London Riverside OAPF will have any likely significant effects⁴ on European sites, both alone, and in combination with other plans, schemes and projects. Where this cannot be concluded at this stage due to a lack of development detail, recommendations for the likely scope of lower tier assessments are provided. In addition, consideration has been given to in-combination effects with other plans and projects where possible at this stage.
- 1.2.4 This screening report for the draft London Riverside OAPF builds on the work⁵ carried out for the Further Alterations to London Plan which was adopted in February 2015.

3 As required by Article 6.3 of the Habitats Directives and interpreted by s102 of the Conservation of Habitats and Species Regulations 2010 which refer to the requirement for an Appropriate Assessment. Appropriate Assessments are commonly known as Habitats Regulations Assessments.

4 'Likely significant effect' in this context is any effect that may reasonably be predicted as a consequence of the plans that may affect the Conservation Objectives (management targets set by Natural England) of the features for which a site was designated.

5 Habitat Regulations Assessment Screening Report, December 2013, Mayor of London.

2 Approach to the Habitats Regulations Screening Assessment

2.2.1 The Habitats Regulations Screening Assessment has comprised a number of stages as described below and has taken account of the new Regulations and relevant published guidance, including draft guidance produced by Natural England⁶. The Habitats Regulations Screening Assessment was undertaken in the following stages:

- A review of the available data on European sites in the GLA area and a surrounding buffer of 15 km from the London Riverside Opportunity Area (OA); and the identification of the following baseline information (see Table 1):
 - the locations of each European site, which are illustrated on Map 1;
 - an understanding of the qualifying features (habitats and species for which the site is designated) of the European sites; and
 - the key sensitivities/vulnerabilities of each habitat type/species, and the condition status of the sites together with known threats across the London area.
- A review of the draft London Riverside OAPF strategies that have the potential to affect European sites, and whether the European sites are vulnerable to the effects. This has included assigning each of the sites to categories described in the Natural England guidance.
- Determine whether any of the European sites could be affected by the strategies, in combination with those from other plans, including the London Plan or projects.
- Where potential effects on European sites are identified, the report recommends changes or other measures (i.e.: mitigation, lower tier assessment) to avoid likely significant effects on European sites.

2.1.2 The draft London Riverside OAPF is a high-level document that does not consider any additional development sites over and above those already considered by local authorities, TfL and the GLA in other publications or studies such as Site Allocation Local Plan (SALP) documents or the Strategic Housing Land Availability Assessment (SHLAA). The strategies of the draft London Riverside OAPF consider the balance of land-use mixes on these sites, particularly the balance between industrial and residential uses as well as how best to address the issues of connectivity and public realm needed to support such development.

⁶ Revised Draft Guidance - The Habitats Regulations Assessment of Local Development Documents. David Tyldesley and Associates for Natural England, January 2009.

2.1.3 As such, the main impacts of the draft OAPF will be on the mix of land-uses likely to come forward on development sites in London Riverside. Given the high-level nature of the document, it is difficult to estimate how the exact level of development and mix of uses will be reflected on each development site. As this is the case, a lower tier assessment, such as through a local development document or planning application, will likely be more appropriate in assessing the specific potential effects on European sites and also in protecting their integrity, once more detail on development proposals become available.

2.1.4 Where the Habitats Regulations Screening Assessment has concluded that the effects of a strategy will be more appropriately addressed through a lower tier assessment, this has been done by adopting a precautionary approach (i.e.: cannot conclude 'no likely significant effect') in accordance with the Natural England draft guidance. This approach is described in the Natural England draft guidance:

"It will be appropriate to consider relying on the Habitats Regulations Assessments of lower tier plans, in order for a LPA to ascertain a higher tier plan would not have an adverse effect on the integrity of a European site, only where:

- A) *The higher tier plan assessment cannot reasonably assess the effects on a European site in a meaningful way; whereas*
- B) *The Habitats Regulations Assessment of the lower tier plan, which will identify more precisely the nature, scale or location of development, and thus its potential effects, will be able to change the proposal if an adverse effect on site integrity cannot be ruled out, because the lower tier plan is free to change the nature and/or scale and/or location of the proposal in order to avoid adverse effects on the integrity of any European site (e.g. it is not constrained by location specific policies in a higher tier plan); and*
- C) *The Habitats Regulations Assessment of the plan or project at the lower tier is required as a matter of law or Government policy.*

2.1.3 In such cases the assessment has indicated what further assessment is likely to be necessary as part of the lower tier assessment.

"There is a need to focus the Habitats Regulations Assessment of LDDs on the strategy, policies and proposals directly promoted by the LDD, and not all and every proposal for development and change, especially where these are planned and regulated through other statutory procedures which will be subject to a Habitats Regulations Assessment."

2.1.4 Further details about the Habitats Regulations Assessment process are provided in Annex A.

3 Baseline information

3.1 European Sites Baseline

- 3.1.1 London is a major international city and heavily developed, hence it is perhaps not surprising that the Greater London area contains few European sites of nature conservation importance.
- 3.1.2 As per that of the London Plan, the scope of this assessment includes all of the European sites:
- within the GLA boundary (2 sites - Richmond Park SAC and Wimbledon Common SAC), or
 - partially within (3 sites - Lea Valley SPA/RAMSAR, Epping Forest SAC and the South West London Waterbodies SPA/RAMSAR) and
 - within a 15 km buffer of the boundary of the London Riverside Opportunity Area (3 RAMSAR/SPA sites – Epping Forest, Lee Valley and Thames Estuary and Marshes) (Appendix D).
- 3.1.3 Table 1 provides a description of the European protected sites that need to be taken into consideration in the Habitats Regulations Screening Assessment. This includes information on the following elements which are explained below:
- conservation objectives;
 - key site sensitivities;
 - current condition; and
 - threats.
- 3.1.4 Conservation objectives are set by Natural England to ensure that the obligations of the Habitats Regulations are met, particularly to ensure that there should be no deterioration or significant disturbance of the qualifying features from their condition at the time the status of the site was formally identified. The conservation objectives are also essential in determining whether the effects of a plan or project are likely to have a significant effect⁷ on the qualifying interests of the site. In June 2012, Natural England revised the standard text for European Site Conservation Objectives for all terrestrial sites to make them clearer and more readily available for developers. It is noted that Natural England is building on these high level terrestrial Conservation Objectives, and in doing so, we will aim to produce (where possible) quantified targets for:
- the populations and distribution of qualifying species;
 - the extent and distribution of qualifying natural habitats and habitats of qualifying species;
 - the structure of qualifying natural habitats and habitats of qualifying species;
 - the supporting processes on which qualifying natural habitats and habitats of qualifying species rely.
- 3.1.5 The key site sensitivities/vulnerabilities for each habitat type were taken from those identified in the HRA Screening Report for the London Plan, which were established by reviewing information provided within the conservation objectives for each site and also from site condition monitoring (typically of the underlying Site of Special Scientific Interest (SSSI) designation).

7 Article 6.2 of the Habitats Directive

Table 1 European Site Information (listed by proximity to GLA boundary)

Natura 2000 Site	Location	Qualifying Feature (Habitats & species)	Conservation Objectives	Site Sensitivities	Current Condition	Threats
Richmond Park SAC (846.68 ha)	<p>Within GLA boundary.</p> <p>The following boroughs are within or adjacent to the European sites:</p> <ul style="list-style-type: none"> Richmond upon Thames Kingston upon Thames Wandsworth Merton 	<i>Lucanus cervus</i> (stag beetle)	<p>With regard to the individual species and/or assemblage of species for which the site has been classified (the Qualifying Features);</p> <p>Avoid the deterioration of the qualifying natural habitats and the habitats of qualifying species, and the significant disturbance of those qualifying species, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving Favourable Conservation Status of each of the qualifying features.</p> <p>Subject to natural change, to maintain or restore:</p> <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 and habitats of qualifying species; The supporting processes on which qualifying natural habitats and habitats of qualifying species rely; The populations of qualifying species; The distribution of qualifying species within the site. 	<p>Water level</p> <p>Water quality – nutrient enrichment from fertiliser run-off etc</p> <p>Scrub encroachment (often due to undergrazing)</p> <p>Development pressure Spread of introduced non-native species</p> <p>Human disturbance (off-road vehicles, burning (vandalism))</p> <p>Atmospheric pollution e.g. nitrous oxides from vehicle exhausts</p>	<p>Area favourable 6%</p> <p>Area unfavourable recovering 8%</p> <p>Area unfavourable no change 86%</p>	<p>Site is surrounded by urban areas and experiences high levels of recreational pressure. This does not directly affect the European interest feature however.</p>
Wimbledon Common SAC (348.31 ha)	<p>Within GLA boundary.</p> <p>The following boroughs are within or adjacent to the European sites:</p> <ul style="list-style-type: none"> Merton Wandsworth Richmond upon Thames Kingston upon 	<p>Northern Atlantic wet heaths with <i>Erica tetralix</i>; Wet heathland with cross-leaved heath</p> <p>European dry heaths</p> <p><i>Lucanus cervus</i>; Stag beetle</p>	<p>With regard to the individual species and/or assemblage of species for which the site has been classified (the Qualifying Features);</p> <p>Avoid the deterioration of the qualifying natural habitats and the habitats of qualifying species, and the significant disturbance of those qualifying species, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving Favourable Conservation Status of each of the</p>	<p>Water quality – e.g. pollution through groundwater and surface run-off sources</p> <p>Water level – maintenance of water table</p> <p>Heavy recreational pressure</p> <p>Spread of non-native / invasive species</p> <p>Scrub encroachment</p>	<p>Area favourable 40%</p> <p>Area unfavourable but recovering 59%</p>	<p>Site is located in an urban area and experiences intensive recreational pressure which can result in damage, particularly to the sensitive areas of heathland.</p>

Natura 2000 Site	Location	Qualifying Feature (Habitats & species)	Conservation Objectives	Site Sensitivities	Current Condition	Threats
	Thames		<p>qualifying features.</p> <p>Subject to natural change, to maintain or restore:</p> <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 and habitats of qualifying species; The supporting processes on which qualifying natural habitats and habitats of qualifying species rely; The populations of qualifying species; The distribution of qualifying species within the site 	Atmospheric pollution (nutrient deposition and acidification)		Air pollution is also thought to be having an impact on the quality of heathland habitat.
Epping Forest SAC (1604.95 ha)	<p>Partially within GLA boundary and within 15km of London Riverside OA.</p> <p>The following boroughs are within or adjacent to the European sites:</p> <ul style="list-style-type: none"> Waltham Forest Redbridge Enfield 	<p>Northern Atlantic wet heaths with <i>Erica tetralix</i>; Wet heathland with cross-leaved heath</p> <p>European dry heaths</p> <p>Atlantic acidophilous beech forests with Ilex and sometimes also <i>Taxus</i> in the shrublayer (<i>Quercion robori-petraeae</i> or <i>Ilici-Fagenion</i>); Beech forests on acid soils</p> <p><i>Lucanus cervus</i>; Stag beetle</p>	<p>With regard to the individual species and/or assemblage of species for which the site has been classified (the Qualifying Features);</p> <p>Avoid the deterioration of the qualifying natural habitats and the habitats of qualifying species, and the significant disturbance of those qualifying species, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving Favourable Conservation Status of each of the qualifying features.</p> <p>Subject to natural change, to maintain or restore:</p> <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 and habitats of qualifying species; The supporting processes on which qualifying natural habitats and habitats 	<p>Water quality – e.g. pollution through groundwater and surface run-off sources</p> <p>Water level – maintenance of water table essential e.g. restrict new drainage ditches around wet woodlands</p> <p>Heavy recreational pressure Spread of non-native / invasive species</p> <p>Scrub encroachment</p> <p>Atmospheric pollution (nutrient deposition and acidification)</p> <p>Development pressure</p>	<p>Area favourable 30%</p> <p>Area unfavourable recovering 34%</p> <p>% area unfavourable no change 26%</p> <p>% area unfavourable declining 10%</p> <p>Reintroduction of pollarding and wood pasture management is helping to reverse the decline of the epiphytic bryophyte population.</p>	<p>Existing air pollution, particularly arising from traffic is thought to contribute to poor condition of parts of the site.</p> <p>Increasing recreational pressure could have an impact on heathland areas.</p>

Natura 2000 Site	Location	Qualifying Feature (Habitats & species)	Conservation Objectives	Site Sensitivities	Current Condition	Threats
			<p>of qualifying species rely;</p> <ul style="list-style-type: none"> The populations of qualifying species; The distribution of qualifying species within the site. 			
Lee Valley SPA / Ramsar (447.87 ha)	<p>Partially within GLA boundary and within 15km of London Riverside OA.</p> <p>The following boroughs are within or adjacent to the European sites:</p> <ul style="list-style-type: none"> Enfield Waltham Forest Haringey Hackney 	<p><i>Botaurus stellaris</i>;</p> <p>Great bittern (Non-breeding)</p> <p><i>Anas strepera</i>; Gadwall (Non-breeding)</p> <p><i>Anas clypeata</i>; Northern shoveler (Non-breeding)</p>	<p>With regard to the individual species and/or assemblage of species for which the site has been classified (the Qualifying Features);</p> <p>Avoid the deterioration of the habitats of the qualifying features, and the significant disturbance of the qualifying features, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving the aims of the Birds Directive.</p> <p>Subject to natural change, to maintain or restore:</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 populations of the qualifying features; The distribution of the qualifying features within the site. 	<p>Water quality - eutrophication is a threat, particularly from point source pollution (e.g. sewage outfalls) but also from surface run-off or groundwater pollution and atmospheric deposition</p> <p>Water levels – a high and stable water table is fundamental.</p> <p>Disturbance to bird feeding and roosting habitat (noise / visual)</p> <p>Siltation (e.g. excessive poaching of lake margins by stock, suspended sediments leading to transport of nutrients)</p> <p>Scrub or tree encroachment (leading to shading, nutrient and hydrological effects)</p> <p>Spread of introduced non-native species</p> <p>Recreational pressure / disturbance (particularly on-water activities with potential to disturb sediment and increase turbidity in lakes)</p> <p>Development pressure</p> <p>Diffuse air pollution from traffic and agriculture.</p>	<p>Walthamstow Reservoirs, Waltham Abbey and Turnford and Cheshunt Pits are 100% favourable.</p> <p>Walthamstow Marshes are 36% favourable and 63% unfavourable but recovering.</p>	<p>Most of the site is in favourable condition, though an increase in recreational use could affect wintering wildfowl numbers.</p> <p>There are currently no factors having a significant adverse effect on the sites character.</p>
South West London Waterbodies SPA/Ramsar (828.14 ha)	<p>Partially within GLA boundary but NOT within 15km of the London Riverside OA.</p> <p>The following</p>	<p><i>Anas strepera</i>;</p> <p>Gadwall (Non-breeding)</p> <p><i>Anas clypeata</i>;</p>	<p>With regard to the individual species and/or assemblage of species for which the site has been classified (the Qualifying Features);</p> <p>Avoid the deterioration of the habitats of the qualifying features, and the</p>	<p>Water quality - eutrophication is a threat, particularly from point source pollution (e.g. sewage outfalls) but also from surface run-off or groundwater pollution and atmospheric</p>	<p>This site is made up of 6 SSSIs of which the majority are 100% favourable with one notable exception,</p>	<p>High levels of disturbance at Wraysbury gravel pits from recreational activities.</p>

Natura 2000 Site	Location	Qualifying Feature (Habitats & species)	Conservation Objectives	Site Sensitivities	Current Condition	Threats
	<p>boroughs are within or adjacent to the European sites:</p> <ul style="list-style-type: none"> Hillingdon Hounslow Richmond upon Thames 	Northern shoveler (Non-breeding)	<p>significant disturbance of the qualifying features, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving the aims of the Birds Directive.</p> <p>Subject to natural change, to maintain or restore:</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 populations of the qualifying features; The distribution of the qualifying features within the site. 	<p>deposition</p> <p>Disturbance to bird feeding and roosting habitat (noise / visual)</p> <p>Water levels – a high and stable water table is fundamental.</p> <p>Siltation (e.g. excessive poaching of lake margins by stock, suspended sediments leading to transport of nutrients)</p> <p>Scrub or tree encroachment (leading to shading, nutrient and hydrological effects)</p> <p>Spread of introduced non-native species</p> <p>Recreational pressure / disturbance (particularly on-water activities with potential to disturb sediment and increase turbidity in lakes)</p> <p>Development pressure</p> <p>Diffuse air pollution from traffic and agriculture.</p>	<p>Wraysbury No 1 gravel pit which is 100% unfavourable and declining.</p> <p>Staines Moor was 73% favourable and 25% unfavourable but recovering.</p>	<p>Potential for other parts of the site to be adversely affected by increased recreational pressure.</p>
Thames Estuary and Marshes SPA/ Ramsar (4838.94/5589 ha)	Outside GLA boundary (approx 14 km to east) and partially within the 15km buffer of the London Riverside OA	<p><i>Circus cyaneus</i>; Hen harrier (Non-breeding)</p> <p><i>Recurvirostra avosetta</i>; Pied avocet (Non-breeding)</p> <p><i>Charadrius hiaticula</i>; Ringed plover (Non-breeding)</p> <p><i>Pluvialis squatarola</i>; Grey plover (Non-breeding)</p> <p><i>Calidris canutus</i>; Red knot (Non-breeding)</p>	<p>With regard to the natural habitats and/or species for which the site has been designated (the Qualifying Features listed below);</p> <p>Avoid the deterioration of the habitats of the qualifying features, and the significant disturbance of the qualifying features, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving the aims of the Birds Directive.</p> <p>Subject to natural change, to maintain or restore:</p> <ul style="list-style-type: none"> The extent and distribution of the habitats of the qualifying features; 	<p>Water quality – pollution</p> <p>Recreational/tourism disturbance</p> <p>Development e.g. dock/harbour creation, coastal defence works</p> <p>Erosion</p> <p>Siltation</p> <p>Dredging</p> <p>Over-fishing</p>	<p>South Thames estuary and Marshes site is 87% favourable, 10% unfavourable but recovering.</p>	<p>Dredging Erosion (North Kent Coastal Management Habitat plan has been produced).</p> <p>The EA is producing a Flood Defence Strategy and future management will need to take into account the effects on the designated sites.</p>

Natura 2000 Site	Location	Qualifying Feature (Habitats & species)	Conservation Objectives	Site Sensitivities	Current Condition	Threats
		<p><i>Calidris alpina alpina</i>; Dunlin (Non-breeding)</p> <p><i>Limosa limosa islandica</i>; Black-tailed godwit (Non-breeding)</p> <p><i>Tringa totanus</i>; Common redshank (Non-breeding) Waterbird assemblage</p>	<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 populations of the qualifying features; • The distribution of the qualifying features within the site. 	<p>Maintenance of appropriate grazing regime</p> <p>Spread of non-native species</p> <p>Disturbance to bird feeding and roosting habitat (noise / visual)</p>		<p>Water quality and sources are subject to further investigation by the EA.</p> <p>There are general human disturbances.</p>

3.2 Summary of effects

3.2.1 Table 1 contains details of the known sensitivities/vulnerabilities of the relevant European sites. The following sections summarise the effects, which could be relevant to strategies in the draft London Riverside OA. A review of the strategies has been undertaken and those where effects have been identified are discussed further in Chapter 4.

Key threats

3.2.2 No direct land take from European sites is proposed by any of the strategies of the draft London Riverside OAPF. In addition, any such land take would be contrary to the aims and objectives of the National Planning Policy Framework, as well as the vision and objectives set out in the draft OAPF.

3.2.3 The Thames Estuary and Marshes SPA are located downstream of the parts of the London Riverside OA that is closest to the Thames. Consequently there is a physical connection between the London Riverside OA and the SPA. However, the area is an existing urban conurbation and there are few development sites directly fronting the river. All development proposals would be required to adhere to London Plan and Local Plan policies relating to the River Thames and Blue Ribbon Network, to protect and enhance the ecology of London's waterways. The scale of development is unlikely to have a significant effect on the ecology of the river. The potential likely impacts of specific development proposals can be assessed by a lower tier screening assessment.

3.2.4 The main links between the development sites in London Riverside and known sensitivities of European nature conservation sites are focused on secondary effects. Secondary effects include pollution effects on habitats and species arising from air emissions for example from vehicles, industrial activities and disturbance to habitats and species which could result from increased accessibility to specific areas to support the recreational demands of a growing population.

Drainage and water pollution

3.2.5 All of the London Riverside OA sites are upstream of, or drain into an area upstream of, the Thames Estuary and Marshes SPA and RAMSAR. Drainage and water pollution are issues which need to be addressed for any project, but any development in London Riverside which is approved or proposed will include appropriate and accepted mitigation subjected to regulatory controls to ensure that adverse effects on integrity of European sites from water pollution and dust do not occur. Such development will be subject to Habitats Regulations Assessment to ensure this occurs if it is in an area where a European site could be affected. This will form part of the scope of lower tier Habitats Regulations Assessment.

Visitor pressure

3.2.6 The qualifying habitats and species of the European sites are known to be sensitive to heavy recreational pressure, and such pressure is already an issue of concern at several of them. This pressure generally results from population growth. The strategies of the draft London Riverside OAPF promote a high level of housing, and will therefore lead directly to population growth. However, the population growth predicted is not

beyond that already projected for the area and subject to lower tier assessment through the Local Plan and London Plan process. As it is residential use that would place the greatest recreational pressure on the European Nature development, such proposals will be subject to Habitats Regulations Assessment if it is in an area where a European site could be affected. This will form part of the scope of lower tier Habitats Regulations Assessment.

- 3.2.7 If a site is developed for housing resulting in local population growth, the London Plan contains policies that encourage the provision of additional local recreation space. Chapter 5 of the draft London Riverside OAPF provides details on existing public space used for recreation, how access to these spaces can be improved and how and where new recreational space can be delivered from expected development. London Riverside is not deficient in public open space, but safe and convenient access to these spaces is challenging, which the OAPF seeks to address.

Air pollution

- 3.2.8 Air pollution is the only other sensitivity considered to have the potential to arise from development in the London Riverside OA. Air pollution threats include nitrogen deposition and acidification which can arise from thermal treatment facilities put forward by waste strategies or an increase in traffic levels in London Riverside, or in combination with air emissions from other sources.
- 3.2.9 The London Riverside OA development sites are some distance from the European Nature Conservation Sites, and it is unknown at this stage if any of the strategies in the document relating to these sites would have a positive or potentially negative effect on air quality. Any development proposals would however be subject to Local Plan and London Plan policies that seek a reduction in air pollution (see London Plan Policy 7.14), which could have a beneficial effect on sensitive European sites. The Mayor's Air Quality Strategy, which addresses air quality issues in London will also influence lower tier assessments.
- 3.2.10 The above key threats were considered when assessing the draft London Riverside OAPF as well as the need for and the scope of lower tier assessment and in combination assessment. The suggested lower tier assessment scope is detailed in Sections 4.5 and 4.6.

4 Screening of policies for Likely Significant Effects

4.1 Introduction

4.1.1 The strategies of the draft London Riverside OAPF cover an area that has already been subject to separate HRA screening exercises undertaken by the London Boroughs of Barking and Dagenham, Havering and Newham as part of the Local Plan process. The relevant Local Plan HRA screening report for Newham can be accessed via the link below. The relevant Local Plan HRA screening reports for Havering and Barking and Dagenham can be obtained from those Council's planning policy teams.

<http://www.newham.gov.uk/Documents/Environment%20and%20planning/CoreStrategyHabitatsRegulationsAssessment.pdf>

4.1.2 In line with the draft guidance from Natural England (see Annex B), the strategies of the draft London Riverside OAPF have been screened against a set of criteria in order to identify whether or not they will affect a change to development likely to come forward on sites in London Riverside and subsequently have a potentially significant effect on a European site.

4.1.3 Strategies that fall into one of the following categories can be screened out:

- Category A1: The strategy will not itself lead to development e.g. because it relates to design or other qualitative criteria for development;
- Category A2: The strategy is intended to protect the natural environment;
- Category A3: The strategy is intended to conserve or enhance the natural, built or historic environment;
- Category A4: The strategy would positively steer development away from European sites and associated sensitive areas; and
- Category A5: The strategy would have no effect because no development could occur through the strategy itself, the development being implemented through other policies in the Local Plan or other policy document, which are more specific and therefore more appropriate to assess for their effects on European Sites and associated sensitive areas.

4.1.4 Annex C presents the results of the screening exercise for the strategies. The first column identifies the relevant policy and the third column identifies the categories that arose from the initial screening exercise.

4.1.5 It is acknowledged that this exercise is subject to value judgements associated with all environmental assessments and although guided by criteria is still highly subjective.

4.1.6 Overall the screening assessment has found that there are two distinct groups of strategies in the draft London Riverside OAPF with regard to likely significant effects:

- Strategies that have been screened out and will have no likely significant effect;
- Strategies where it cannot be concluded at this stage that they would have no likely significant effect, including those for which the assessment is more appropriate at a lower tier.

4.2 Sites where No Likely Significant Effects are concluded

4.2.1 The following strategies have been concluded to have no likely significant effect on European sites based on the Natural England guidance. These strategies can therefore

be screened out:

- Transport strategy (chapter four)

4.3 Sites where it cannot be concluded that there would be No Likely Significant Effect

4.3.1 The following strategies could not be screened out because it could not be concluded at this stage that they would have no likely significant effect, largely as they could result in potential pressure on European sites from increased visitor numbers as well as air and waterborne pollution:

- Land use strategy
- Urban design strategy

4.3.2 These sites cannot be screened at this stage due to a lack of available information including potential use, scale of the use, detailed design and mitigation measures. In these cases, there is a potential need to carry out Habitats Regulations Assessment at a lower stage in the planning process which is considered to be the most appropriate approach in accordance with Natural England guidance. This will depend on the proposed use and scale of any development.

4.3.3 Despite the need for a further Habitats Regulations Assessment, London Plan Policy 7.19 sets out how plans, policies and development proposals should ensure the protection for European sites. It also contains policies to limit the effects of the Key Threats identified in Chapter 3. The relevant London Plan policies are:

- Policy 7.14 seeks to address air quality issues
- Policy 7.17 and 7.18 seeks to ensure the adequate provision of a variety of open space is provided
- Policy 5.14 seeks to address water quality

4.4 Potential likely significant effects and policy recommendations to address these

4.4.1 As identified in section 4.3, only strategies 3, 4 and 5 are considered to have any potentially likely effect as it is unclear how they will impact development proposals at this moment in time. Table 2 below sets out which Natural England guidance category the strategy falls under with regards to the assessment, that it cannot be concluded the strategy will have no significant effect on a European nature conservation site. Recommendations are provided to limit any potential likely significant effects.

Table 2 Potential Likely Significant Effects and Policy Recommendations

Strategies	Why it cannot be concluded at this stage that the strategy will have no likely significant effects	Comments and recommendations
Land use and urban design	E	Include a reference to consider European Sites in the Implementation chapter of the final draft London Riverside OAPF. Apply London Plan Policy 7.19 when assessing planning applications

4.5 Lower tier assessment

4.5.1 Unknown effects when developing high level documents can be more effectively assessed and addressed through lower tier assessments. At local development plan (if not already done so) or planning application stage, effects will be considered at the outset of the development of specific sites within the City Fringe OA in order to ensure avoidance of likely significant adverse effects on European sites both alone and in combination with other plans and projects, such as other local plans, the London Plan and other Mayoral Strategies. The general scope of key issues for lower tier assessments for each of the identified effects, to ensure that adverse effects are avoided to European sites are outlined in the sections below.

4.5.2 Visitor pressure

(Lee Valley SPA/Ramsar, Epping Forest SAC, Thames Estuary and marshes RAMSAR/SPA are in proximity to the London Riverside OA):

- The key areas of the European sites which are subject to visitor pressure will be identified along with the times of year when effects are greatest and the species affected.
- The current mechanisms for controlling visitor numbers and hence disturbance will be identified.
- The extent to which the proposals will increase visitor pressure / disturbance will be confirmed.
- Where necessary changes will be made to the development design / implementation, or additional controls required at the European site to avoid adverse effects (e.g. from significant disturbance to birds).
- Development to comply with London Plan policies on the provision of a variety of recreation space to meet the demand generated by the development.

4.5.3 Air pollution effects

(Lee Valley SPA/Ramsar, Epping Forest SAC, Thames Estuary and Marshes RAMSAR/SPA are in proximity to the London Riverside OA):

- The qualifying habitats and the specific locations of each habitat type within each European site which are sensitive to air pollution will be identified.
- Current critical loads/levels for relevant pollutants at the habitats identified will be reviewed.
- An assessment of the effects of air emission from the potential development will be undertaken including air emission modelling if considered necessary. The final land use, scale and associated traffic will be informed by the findings of this assessment.
- Development to comply with London Plan policies on air quality, including that developments are to be air quality neutral, such as through the inclusion of mitigation measures.

4.5.4 Water pollution effects

(Thames Estuary and Marshes SPA/Ramsar are downstream):

- The potential uses, scale and construction methods of specific development sites are unknown. The dispersal of sediments and pollutants from the potential development sites will be assessed (using predictive modelling where necessary) for their potential impact on the European site which are downstream from any

relevant riverside sites to be developed.

- Where required mitigation measures which will be developed to avoid significant impacts to sensitive habitats and the bird species they support, so that adverse effects do not result to the integrity of the European site.
- Development to comply with London Plan policies on sustainable design and construction, and waterborne pollution.

4.6 In-combination effects

4.6.1 The draft London Riverside OAPF is a high level document that focuses on the key areas that planning can influence, that will allow the industries of London Riverside to continue to grow whilst freeing up underused or surplus land for new housing and mixed use developments to drive the regeneration of this part of East London. It should be remembered that, while the document aims to shape development, nothing will happen unless and until there is a planning permission for individual sites. Where development is proposed within London Riverside, it will be subject to a range of plans and programmes including the London Plan, Mayoral Strategies and local plans and strategies. Many of these will have been subject to their own HRA (see section 4.1.1), including the London Plan HRA, which this builds on, with the London Plan being the strategic plan that the draft OAPF is based on.

4.6.2 In order for the London Riverside OAPF to not have any adverse effects on the integrity of European sites, the recommendation in Table 2 will need to be complied with, although it is noted that no direct adverse impacts are anticipated from the strategies of the OAPF. Any lower tier assessment can be undertaken in a sufficiently flexible manner which allows changes (e.g.: in the nature of the development, its scale, mitigation measures) to protect European sites.

5 Assessment summary

5.1.1 This assessment of the London Riverside OAPF has identified that for most of the proposed strategies it can be concluded there would be no likely significant effects. In addition, strategies which could give rise to 'likely significant effect' on European sites have been identified, where it cannot be concluded at this stage that they will have no likely significant effects.

5.1.2 The main potential effects are likely to arise from increased visitor pressure brought about through increased numbers of residents, workers and visitors in London Riverside and air quality effects from increased traffic. The promotion of new housing and jobs could result in increased visitor pressure, although provision of new recreational spaces and the improvements to access of existing spaces should lead help to alleviate impacts. These potential effects have been addressed by the recommendation that the Implementation Chapter of the final document includes a reference to consider European Nature Conservation Sites and that London Plan Policy 7.19 be applied when assessing planning applications.

5.1.3 It is also noted that the London Plan and other Mayoral strategies such as the Air Quality Strategy contains a specific policy to protect European Nature Conservation Sites as well as address the potential impacts of recreation pressure, air quality and waterborne pollution.

5.1.4 Depending on the development sites proximity, proposed land use, scale and

mitigation measures a Habitats Regulations Assessment may be required at the lower tier assessment stage.

Annex A

THE HABITATS REGULATION ASSESSMENT PROCESS

The process is prescribed in Article 6(3) and (4) of Habitats Directive as described in Box 1.1.

Box 1.1 Habitats Directive (Council Directive 92/43/EEC)

Article 6(3)

'Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans and projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. In light of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public.'

Article 6(4)

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

Where the site concerned hosts a priority natural habitat type and/ or priority species, the only considerations which may be raised are those related to human health or public safety, of beneficial consequences of primary importance for the environment or, further to an opinion from the Commission, to other imperative reasons of overriding public interest'.

European guidance⁹ on assessing projects and plans against the requirements of the Habitats Regulations includes a staged process to the assessment.

1. Define the proposals.
2. Establish that the proposals are not necessary to the management of the site for nature conservation purposes.
3. Determine whether the proposals are likely to have a significant effect on the site
4. If proposals are likely to have a significant effect, assess the implications of the proposals for the site's Conservation Objectives so as to answer the question "can it be demonstrated that the proposal will not adversely affect the integrity of the site?" This is referred to as the Appropriate Assessment.
5. If the Appropriate Assessment indicates that no adverse effect will occur the competent authority may proceed to grant consent; if not, further steps are required to

⁹ European Commission Environment Division 2001; Assessment of plans and projects significantly affecting Natura 2000 sites

demonstrate that specific reasons why the plan should be permitted apply, before the plan may be adopted.

PROCESS OF DETERMINING LIKELY SIGNIFICANT EFFECT

To determine if the proposals are likely to have any significant effects on the designated sites the following issues are considered:

- could the proposals affect the qualifying interest and are they sensitive to the effect;
- the probability of the effect happening;
- the likely consequences for the site's Conservation Objectives (as defined by Natural England) if the effect occurred; and
- the magnitude, duration and reversibility of the effect.

The aim of the Habitats Regulations process is to demonstrate that the proposals will not have an adverse effect on the integrity of the site. Site integrity is defined as:

*"the coherence of its structure and function across its whole area that enables it to sustain the habitat, complex of habitats and/or the levels of populations of the species for which it was classified"*¹⁰.

The decision on whether the site integrity could be adversely affected by the proposals should focus on and be limited to the site's Conservation Objectives.

European Commission guidance on the screening process recommends that the determination of likely significant should be undertaken in the absence of any mitigation measures¹¹. This assessment has however, considered mitigation following a recent legal decision in the UK, which has indicated that there is no reason why a screening assessment must be carried out in the absence of any mitigation, and a competent authority should take account of such measures¹².

The Dilley Lane High Court Judgement concluded no legal requirement that a Habitats Regulations Assessment under Regulation 48(1) must be carried out in the absence of any mitigation measures that form part of a plan or project. On the contrary, the competent authority is required to consider whether the project as a whole, including such measures, if they are part of the project, is likely to have a significant effect on the European site.

This judgement makes clear that mitigation should be considered for any proposal, and can include a range of appropriate measures both on and off site that avoid or minimise the adverse impact of a plan or project on a European site.

The assessment should draw on the following information:

- description of the European sites and the qualifying interest features for which the sites are designated;

10 European Communities (2000) Managing Natura 2000 sites - The provisions of Article 6 of the 'Habitats' Directive 92/43/CEE. EC

11 European Commission Environment DG (2001) Assessment of Plans and Projects Significantly Affecting Natura 2000 Sites. EC.

12 Dilley Lane Judgement - Hart District Council v The Secretary of State for Communities and Local Government, Luckmore Limited and Barratt Homes Limited (CO/7623/2007) 1st May 2008

- details on the plan and policies, highlighting possible effects on the qualifying interest features of the European sites;
- identification and evaluation of impacts on the ecology and nature conservation value of the European sites; and
- the potential for in-combination effects when considered along with other existing and potential or foreseeable plans, strategies and projects or schemes.

This information should be gathered from data held by the Joint Nature Conservation Committee (JNCC), Natural England and the Environment Agency.

Annex B

Categories taken from Natural England draft guidance

Table B1.1
Potential Effect Categories (taken from Natural England draft guidance ¹³).

Category	Broad Effects	Conclusion for Likely Significant Effects (LSE) at this Stage
Category A	Elements of the plan that would have no negative effect on a European site at all.	No LSE
Category B	Elements of the plan that could have an effect, but the likelihood is there would be no significant effect on a European site either alone or in combination with other elements of the same plan, or other plans or projects.	No LSE
Category C	Elements of the plan that could or would be likely to have a significant effect alone and will require the plan to be subject to an appropriate assessment before the plan may be adopted.	LSE
Category D	Elements of the plan that would be likely to have a significant effect in combination with other elements of the same plan, or other plans or projects and will require the plan to be subject to an appropriate assessment before the plan may be adopted.	LSE
Category E	Elements of the plan the effects of which will be more appropriate for lower tier assessments ¹⁴	It cannot be concluded that there would be no LSE at this stage, therefore assume LSE
Category F	Elements of the plan the effect of which depends on how the plan is implemented.	It cannot be concluded that there would be no LSE at this stage, therefore assume LSE

The further guidance tables below help to show the decision process behind identification of potential effects of the policies.

Table B1.2 **Likely Effect Categories (taken from Natural England draft guidance¹⁵)**

Category	Sub-Category	Types of policy for consideration
<i>Category A – No negative Effect</i>	A1	Policies that will not themselves lead to development e.g. because they relate to design or other qualitative criteria for development, or they are not a land use planning policy.
	A2	Policies intend to protect the natural environment, including biodiversity.
	A3	Policies intended to conserve or enhance the natural, built or historic environment, where enhancement measures will not be likely to have any negative effect on a European site.
	A4	Policies that positively steer development away from European sites and associated sensitive areas.

¹³ Revised Draft Guidance. The Habitats Regulations Assessment of Local Development Documents. David Tyldesley and Associates for Natural England, January 2009.

¹⁴ Where - the higher tier plan assessment cannot reasonably assess the effects on a European site in a meaningful way: whereas the HRA of the lower tier plan, which will have more specific detail, will be able to change the proposal if an adverse effect cannot be ruled out, because the lower tier plan is free to change the nature and/or scale and/or location of the proposal in order to avoid adverse effects on the integrity of any European site (eg it is not constrained by location specific policies in a higher tier plan: and the HRA of the plan or project at the lower tier is required as a matter of law or Government policy.

¹⁵ Revised Draft Guidance. The Habitats Regulations Assessment of Local Development Documents. David Tyldesley and Associates for Natural England, January 2009.

Category	Sub-Category	Types of policy for consideration
Category B – No significant effect	B	Effects are trivial or ‘de minimis’, even if combined with other effects.
	C1	The policy could directly affect a European site because it provides for, or steers, a quantity or type of development onto a European site, or adjacent to it.
Category C - Likely significant effects alone	C2	The policy could indirectly affect a European site e.g. because it provides for, or steers, a quantity or type of development that may be very close to it, or ecologically, hydrologically or physically connected to it or it may increase disturbance as a result of increased recreational pressures.
	C3	Proposals for a magnitude of development that, no matter where it was located, the development would be likely to have a significant effect on a European site.
	C4	Policies for developments or infrastructure projects that could block options or alternatives for the provision of other development or projects in the future, which will be required in the public interest, that may lead to adverse effects on European sites, which would otherwise be avoided.
	C5	Any other policies that would be vulnerable to failure under the Habitats Regulations at project assessment stage; to include them in the plan would be regarded by the EC as ‘faulty planning’.
	C6	Any other proposal that may have an adverse effect on a European site, which might try to pass the tests of the Habitats Regulations at project assessment stage by arguing that the plan provides the imperative reasons of overriding public interest to justify its consent despite a negative assessment.
	Category D - Likely significant effects in combination	D1
D2		Policies that alone would not be likely to have significant effects but if their effects are combined with the effects of other plans or projects , and possibly the effects of other developments provided for in the LDD as well, the combined effects would be likely to be significant.
D3		Proposals that are, or could be, part of a programme or sequence of development delivered over a period, where the implementation of the early stages would not have a significant effect on European sites, but which would dictate the nature, scale, duration, location, timing of the whole project, the later stages of which could have an adverse effect on such sites.
Category E - Cannot conclude No LSE at this stage - lower tier assessment	E1	A policy would have no effect where development could occur through the policy itself, because it is implemented through later policies in the same DPD, which are more detailed and therefore more appropriate to assess for their effects on European sites and associated sensitive areas. These kinds of policies may be found in the Core Strategy where a broad quantity of development may be specified as being delivered through a more specific policy in a later chapter or section of the DPD.
	E2	A policy that makes provision for a quantity / type of development (and may indicate one or more broad locations e.g. a particular part of the plan area),

Category	Sub-Category	Types of policy for consideration
Category F - Cannot conclude No LSE at this stage - depends on how the plan is implemented	F	<p data-bbox="604 255 1350 342">but the detailed location of the development is to be selected following consideration of options in later, more site specific DPD. The consideration of options in the later DPD will need to assess potential effects on European sites.</p> <p data-bbox="604 376 1350 488">Policies depend entirely on how they are implemented in due course, through the development management process. There is a theoretical possibility that if implemented in one or more particular ways, the proposal could possibly have a significant effect on a European site.</p> <p data-bbox="604 521 1350 745">In these specific circumstances where there is uncertainty about the way in which aspects of a plan may be implemented, it may be appropriate for policies to contain restrictions or caveats in order to exclude support for potentially damaging proposals. It is advised that the caveat could be added during the screening stage whereupon the policy could be reassessed and placed in Category A or B. Alternatively the policy could be taken forward to appropriate assessment to check that the caveat, when added, would avoid an adverse effect on the integrity of the European site.</p> <p data-bbox="604 779 1350 925">A caveat may relate to proposals not being in accordance with the development plan or may prevent the potentially damaging proposals from occurring unless the potential effect on the European site has been resolved. For example, the development cannot take place until related infrastructure is in place, having passed the tests of the Habitats Regulations.</p>

Annex C

Results of strategy screening exercise

Strategy	Title	Comments and recommendations
1	Land use strategy	This strategy relates to the intensification and consolidation of industrial land in the area to release surplus land for new housing. It cannot be concluded at this stage that development would have no likely significant effect, but assessment is more appropriate at a lower tier.
2	Transport strategy	This strategy relates to the need to enhance and improve existing transport infrastructure in the area in order to support the level of growth anticipated. The strategy includes smaller scale interventions such as improved access to stations and across roads/railways, to the more significant interventions such as extensions to existing lines with new stations and potential tunneling of the A13. It cannot be concluded at this stage that development would have no likely significant effect, but assessment is more appropriate at a lower tier.
3	Urban design strategy	This strategy relates to the location and land use of the key development areas within London Riverside. It cannot be concluded at this stage that development would have no likely significant effect, but assessment is more appropriate at a lower tier.

Annex D:
Map of City Fringe OAPF and protected sites

