

Habitats Regulations Assessment

Draft Screening Report

Safeguarded Wharves Review 2011/12

July 2012

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1 Introduction

1.1 The Safeguarded Wharves Review

- 1.1.1 This Habitats Regulations Assessment (HRA) has been developed to inform the Safeguarded Wharves Review 2011/12. The review is based on London Plan Policy 7.26. The policy supporting text (paragraph 7.76) indicates that reviews of the safeguarding should take place approximately every five years. The starting point for the review was an independent forecast of waterborne freight trade and broad wharf capacity estimates for London's waterways. Consultants URS were commissioned by the Mayor in collaboration with its project partners the Port of London Authority (PLA), Transport for London (TfL), and British Waterways (BW) to carry out this work. They combined a top-down approach (i.e. the use of historic data, trends and policy drivers) with a bottom-up approach (i.e. the consultation with key stakeholders). The estimated future demand, i.e. the forecasting result, was compared with the theoretical capacity. This comparison led to a capacity surplus or a capacity deficit for three different areas of London (west of London Bridge, north east along the Thames, south east along the Thames) and for specific commodity groups (with a particular focus on construction material and waste).
- 1.1.2 The capacity work was complemented by detailed assessments setting out the key characteristics of all existing wharves based broadly on the viability test criteria in paragraph 7.77 (Policy 7.26) of the London Plan covering in particular operational space/status, land and water based access, planning and surrounding uses, local environmental impacts (where information provided by boroughs) and market areas. The site assessments were instrumental in identifying wharves that could potentially be considered for release – in areas with a capacity surplus. Where a capacity deficit was established the re-activation of vacant or road served wharves was recommended.
- 1.1.3 This HRA enables an assessment of the considered safeguarding designations 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

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.

- Offshore Marine Site (OMS), and
- RASMAR sites which protect wetlands.

1.2.3 To ensure compliance with the Regulations, a Habitats Regulations Assessment³ for the Safeguarded Wharves Review has been prepared. This report represents the findings of the first stage in this process, the Habitats Regulations Screening Assessment. The Habitats Regulations Screening Assessment will determine whether the wharves under consideration 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 assessment 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 Safeguarded Wharves Review builds on that⁵ prepared for the replacement London Plan which was published in July 2011.

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 Habitats Regulations Assessment Screening Report. October 2009 Mayor of London.

2 Approach to the Habitats Regulations Screening Assessment

2.1.1 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 considered wharf sites; 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 considered wharf sites to be released or to be encouraged to be reactivated which 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 safeguarding considerations 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 Safeguarded Wharves Review is a high level document that simply reviews the viability of wharves against a demand forecast and not their potential land use. The site assessments include a description of the local areas which provides clues to what the potential land uses could be. This can result in uncertainty of the likely impacts. In some circumstances a lower tier assessment such as through a local development document or planning application will be more appropriate in assessing the potential effects on European sites and also in protecting their integrity, once more detail on the proposals is available. Where the Habitats Regulations Screening Assessment has concluded that the effects of a considered wharf 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. 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:

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

- 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 replacement 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 considered wharves (1 site) (Map 1).
- 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. Natural England has recently (June 2012) 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 and 15km of considered wharf sites.</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 	<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 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</p> <p>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 and 15km of the considered wharf sites.</p>	<p>Northern Atlantic wet heaths with <i>Erica tetralix</i>; Wet heathland with cross-leaved heath</p> <p>European dry heaths</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</p>	<p>Water quality – e.g. pollution through groundwater and surface run-off sources</p> <p>Water level – maintenance of water table</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</p>

Natura 2000 Site	Location	Qualifying Feature (Habitats & species)	Conservation Objectives	Site Sensitivities	Current Condition	Threats
	<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 Thames 	<p><i>Lucanus cervus</i>; Stag beetle</p>	<p>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>Heavy recreational pressure</p> <p>Spread of non-native / invasive species</p> <p>Scrub encroachment</p> <p>Atmospheric pollution (nutrient deposition and acidification)</p>		<p>the sensitive areas of heathland.</p> <p>Air pollution is also thought to be having an impact on the quality of heathland habitat.</p>
Epping Forest SAC (1604.95 ha)	<p>Partially within GLA boundary and 15km of considered wharf sites.</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 <i>Ilex</i> and sometimes also <i>Taxus</i> in the shrublayer (<i>Quercion roburi-petraeae</i> or <i>Illici-Fagenion</i>); Beech forests on acid soils</p> <p><i>Lucanus cervus</i>; Stag</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>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</p> <p>Spread of non-native / invasive species</p> <p>Scrub encroachment</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
		beetle	<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>Atmospheric pollution (nutrient deposition and acidification)</p> <p>Development pressure</p>		
Lee Valley SPA / Ramsar (447.87 ha)	<p>Partially within GLA boundary and 15km of considered wharf sites.</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>; 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; 	<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>Walthamstow Reservoirs, Waltham Abbey and Turnford and Cheshunt Pits are 100% favourable. 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 site's character.</p>

Natura 2000 Site	Location	Qualifying Feature (Habitats & species)	Conservation Objectives	Site Sensitivities	Current Condition	Threats
			<ul style="list-style-type: none"> The populations of the qualifying features; The distribution of the qualifying features within the site. 	<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>		
South West London Waterbodies SPA / Ramsar (828.14 ha)	<p>Partially within GLA boundary and 15km of considered wharf sites.</p> <p>The following boroughs are within or adjacent to the European sites:</p> <ul style="list-style-type: none"> Hillingdon Hounslow Richmond upon Thames 	<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 	<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>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>This site is made up of 6 SSSIs of which the majority are 100% favourable with one notable exception, Wraysbury No 1 gravel pit which is 100% unfavourable and declining. Staines Moor was 73% favourable and 25% unfavourable but recovering.</p>	<p>High levels of disturbance at Wraysbury gravel pits from recreational activities.</p> <p>Potential for other parts of the site to be adversely affected by increased recreational pressure.</p>

Natura 2000 Site	Location	Qualifying Feature (Habitats & species)	Conservation Objectives	Site Sensitivities	Current Condition	Threats
			features within the site.	Recreational pressure / disturbance (particularly on-water activities with potential to disturb sediment and increase turbidity in lakes) Development pressure Diffuse air pollution from traffic and agriculture.		
Thames Estuary and Marshes SPA/ Ramsar (4838.94/558 9 ha)	Outside GLA boundary - approx 14 km to east and the edge of the 15km buffer of considered wharf sites	<i>Circus cyaneus</i> ; Hen harrier (Non-breeding) <i>Recurvirostra avosetta</i> ; Pied avocet (Non-breeding) <i>Charadrius hiaticula</i> ; Ringed plover (Non-breeding) <i>Pluvialis squatarola</i> ; Grey plover (Non-breeding) <i>Calidris canutus</i> ; Red knot (Non-breeding) <i>Calidris alpina alpina</i> ; Dunlin (Non-breeding) <i>Limosa limosa islandica</i> ; Black-tailed godwit (Non-breeding) <i>Tringa totanus</i> ; Common redshank (Non-breeding) Waterbird assemblage	With regard to the natural habitats and/or species for which the site has been designated („the Qualifying Features listed below); 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. Subject to natural change, to maintain or restore: <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. 	Water quality – pollution Recreational/tourism disturbance Development e.g. dock/harbour creation, coastal defence works Erosion Siltation Dredging Over-fishing Maintenance of appropriate grazing regime Spread of non-native species Disturbance to bird feeding and roosting habitat (noise / visual)	South Thames estuary and Marshes site is 87% favourable, 10% unfavourable but recovering.	Dredging Erosion (North Kent Coastal Management Habitat plan has been produced). The EA is producing a Flood Defence Strategy and future management will need to take into account the effects on the designated sites. Water quality and sources are subject to further investigation by the EA. There are general human disturbances.

3.2 Summary of the Main Sensitivities of and Key Threats to the European Sites

- 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 the proposals in relation to the wharf sites. A review of the sites has been undertaken and those where effects have been identified are discussed further in Chapter 4 and listed in Annex C.

Key Threats

- 3.2.2 No direct land take from European sites is proposed by any of the proposed altered wharf designations and given the location of the identified wharves it is not possible to alter the wharves in a way that could directly take land from a European site. In addition any such land take would be contrary to the aims and objectives of the National Planning Policy Framework and London Plan policy 7.19.
- 3.2.3 The Thames Estuary and Marshes SPA is located downstream of the wharf sites. Consequently there is a physical connection between the wharf sites and the SPA. However, these are relatively small development sites within an existing urban conurbation and 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 wharf sites 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 considered wharf sites are upstream of the Thames Estuary and Marshes SPA and RASMAR. Drainage and water pollution are issues which need to be addressed for any project, but any development resulting from the considered wharves 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 site assessments of the safeguarded wharves review characterise the surrounding nature of each site and where available some direct local environmental impacts. The area surrounding the considered wharves is generally industrial, and where a change in the designation is proposed, in the near future it is unlikely to lead to redevelopment for residential use, which would place the greatest recreational pressure on the European Nature

Conservation Sites. The two exceptions to this may over time be sites 23 and 33. Any development 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. 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. In addition, the new Olympic Park creates significant additional greenspace in the vicinity of site 33.

Air Pollution

- 3.2.7 Air pollution is the only other sensitivity considered to have the potential to arise from the Safeguarded Wharves Review. 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 close proximity to the sites, or in-combination with air emissions from other sources.
- 3.2.8 The considered wharf sites are some distance from the European Nature Conservation Sites, and it is unclear if any change in designation or promotion of reactivation would have a positive or potentially negative effect on air quality. Any change in use of the sites would be subject to local or London Plan policies that seek a reduction in air pollution (see London Plan Policies 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.
- 3.2.9 The above key threats were considered when assessing the Safeguarded Wharves Review 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 Overview

4.1.1 This section presents the findings of an assessment of the proposed changes to the wharf safeguarding designations resulting from the Safeguarded Wharves Review to determine their potential to generate likely significant effects on European sites. This review has categorised the potential effects using the category types provided in the Natural England guidance (see Annex B, Table B1.1, with sub-categories in Table B1.2). The wharf sites under review have been grouped based on their:

- proposed designation change
- distance and link to European sites
- existing use
- potential use if release proposed
- potential use if safeguarding designation retained – e.g. promotion of reactivation of safeguarded site

4.1.2 A full list of sites and their categorisation is contained in Annex C.

4.1.3 Overall the screening assessment has found that there are two conclusions that can be drawn for the considered safeguarding designations.

- sites that have been screened out and will have no likely significant effect; and
- sites 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, or generated and delivered by other plans and programmes outside the London Plan.

4.2 Sites where No Likely Significant Effects are concluded

4.2.1 As there is no proposed significant change to the existing use of the wharf site, the following sites have been concluded to have no likely significant effect on European sites based on the Natural England guidance – Sites 3, 4, 5, 6, 7, 10, 12, 14, 15, 16, 17, 18, 19, 20, 21, 22, 24, 26, 28, 29, 30, 34, 35, 36, 37, 38, 39, 40, 43, 44, 45, 46, 47, 48, 49, 50.

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

4.3.1 The remaining sites (1, 2, 8, 9, 11, 13, 23, 25, 31, 32, 33, 41, 42) 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. The 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 where a category 'F' has been assigned, 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 change in the use of the considered wharf sites.

4.3.2 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 The considered wharf sites are in a limited number of uses with limited options for change depending on whether they are proposed to be retained, released or newly designated. Given the limited number of scenarios the wharves have been grouped into the following categories:

- 1 - retain wharf designation - in existing wharf use, so no identifiable change to use
- 2a - retained wharf designation - in use for other industrial/commercial use including storage only, but promotion of reactivation, so potential new use - industrial
- 2b - retained wharf designation - not in use, but promotion of reactivation, so potential new use - industrial
- 3 - released wharf - in use for other industrial/commercial use, so no identifiable change to use
- 4 - released wharf - not in use so potential new use - residential or industrial/commercial
- 5 - new wharf designation - in existing wharf use, so no identified change to use

4.4.2 As identified in sections 4.2 and 4.3, only the wharf sites in categories 2a, 2b and 4 are considered to have any potentially likely effect as it is unclear if there will be a new use or intensification of an existing use of the considered wharf site. Table 2 below sets out which Natural England guidance category the considered wharf site falls under with regards to the assessment that it cannot be concluded the consideration of the site will have no significant effect on a European nature conservation site and provides recommendations to limit and potential likely significant effects.

Table 2 Potential Likely Significant Effects and Policy Recommendations

Wharf sites	Why it cannot be concluded at this stage that the site will have no likely significant effect	Why approach will have no likely significant effect	Comments and Recommendations
2, 9, 25, 41	F	-	Include a reference to consider European Sites in the Implementation Section of each site assessment. Apply London Plan Policy 7.19 when assessing planning applications.
1, 8, 11, 13, 27, 31, 32	F		Include a reference to consider European Sites in the Implementation Section of

Wharf sites	Why it cannot be concluded at this stage that the site will have no likely significant effect	Why approach will have no likely significant effect	Comments and Recommendations
			each site assessment. Apply London Plan Policy 7.19 when assessing planning applications.
23, 33	F	-	Include a reference to consider European Sites in the Implementation Section of each site assessment. 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. Table 3 shows the considered wharf sites of the Safeguarded Wharves Review that may require lower tier assessments and the key effects requiring consideration.

Table 3 Lower Tier Assessment Identification

Element of Wharves review requiring assessment ⁸	European site identified	Likely effects	Assessment scope
Sites 1, 8, 11, 13, 27, 31, 32, 2, 9, 25, 41 Promotion of reactivation of wharf use, potentially increasing industrial activities.	Wimbledon Common and Richmond Park SACs are in close proximity	Increased industrial processes resulting in air pollution to habitats and species.	See section 4.5.4
	Lee Valley SPA/Ramsar is in proximity	Increased waterborne transport should reduce air pollution.	
	Epping Forest SAC is in proximity	Potential for waterborne pollution effects downstream.	See section 4.5.5
	Upstream from Thames Estuary and Marshes SPA/Ramsar		
Potential change of use including to residential.	Lee Valley SPA/Ramsar is in proximity	Increased visitor pressure potentially resulting in disturbance to bird populations and habitats.	See section 4.5.3
Sites 23, 33	Epping Forest SAC is in proximity		
	Upstream from Thames	Increased traffic resulting in air pollution disturbance to	See section 4.5.4

⁸ See Safeguarded Wharves Review for location of sites

- 4.5.2 At local development plan or planning application stage effects will be considered at the outset of the development of these sites 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.
- 4.5.3 Visitor Pressure (Lee Valley SPA/Ramsar and Epping Forest SAC are in proximity of sites with a potential for the change to use for housing):
- 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.
- 4.5.4 Air Pollution Effects (Lee Valley SPA/Ramsar, Epping Forest SAC, Wimbledon Common and Richmond Park SACs are in proximity):
- 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, capacities of facilities 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.
- 4.5.5 Water Pollution Effects (Thames Estuary and Marshes SPA/Ramsar are downstream):
- The potential uses, scale and construction methods of the sites, especially the easterly 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 the potential wharf 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 Safeguarded Wharves Review is a high level document that simply reviews the viability of wharves against a demand forecast and some local environmental factors. Where action is proposed to the considered sites, the resulting development 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, including the London Plan HRA, which this builds on with the London Plan being the strategic plan the Safeguarded Wharves Review is based on.
- 4.6.2 In order for the Safeguarded Wharves Review not to 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 wharves review. Any lower tier assessment can be undertaken in a sufficiently flexible manner which allows changes (eg in the nature of the development, its scale, mitigation measures) to protect European sites.

5 Assessment summary

- 5.1.1 This assessment of the Safeguarded Wharves Review has identified that for most of the considered wharf designations it can be concluded there would be no likely significant effects. In addition, considered wharf designations 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 redevelopment to residential use of the two vacant wharves identified (nos 23, 33) and air quality effects, where in particular vacant wharves are promoted for reactivation. Where sites are currently in industrial use with the wharf not in use, the promotion of reactivation could lead to reduced impacts as water transport would replace road transport. These potential effects on European Nature Conservation Sites have been addressed by the recommendation that the Implementation Section of each relevant site assessment includes a reference to consider European Nature Conservation Sites.
- 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 wharf sites proximity, proposed land use, scale and mitigation measures a Habitats Regulations Assessment will 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 guidance¹³).

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
Category A – No negative Effect	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.
Category C – Likely significant effects alone	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.
	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	The policy alone would not be likely to have significant effects but if its effects are combined with effects of other policies or proposals provided for or coordinated by the LDD (internally) the cumulative effects would be likely to be significant.
	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
		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.
Category F - Cannot conclude No LSE at this stage - depends on how the plan is implemented	F	<p>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>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>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 Wharf sites and their categorisation

No	Wharf name
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West Sub-region	
	Hammersmith and Fulham
1	Hurlingham Wharf
2	Swedish Wharf
3	Comley's Wharf (formerly RMC Fulham)
	Wandsworth
4	Smugglers Way (formerly Western Riverside Transfer Station)
5	Pier Wharf
6	Cringle Dock
7	Kirtling Wharf (formerly RMC Battersea – Metro Greenham)
8	Middle Wharf (formerly RMC Vauxhall)
	Kensington and Chelsea
9	Cremorne Wharf
	City of London
10	Walbrook Wharf

South East Sub-region	
	Lewisham
11	Convoys Wharf
	Greenwich
12	Brewery Wharf
13	Tunnel Wharf (formerly Tunnel Glucose)
14	Victoria Deep Water Terminal
15	Angerstein Wharf
16	Murphy's Wharf
17	Riverside Wharf
	Bexley
18	Middleton Jetty (formerly Borax Wharf/Manor Wharf)
19	Mulberry Wharf
20	Pioneer Wharf
21	Albion Wharf
22	Erith Wharf (formerly RMC Erith)
23	Railway Wharf
24	Town Wharf (formerly EMR Erith – Mayer Parry Recycling)

25	Standard Wharf
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North East Sub-region	
	Tower Hamlets
26	Northumberland Wharf
27	Orchard Wharf
	Newham
28	Priors Wharf
29	Mayer Parry Wharf (formerly EMR Canning Town)
30	Thames Wharf
31	Peruvian Wharf
32	Manhattan Wharf
33	Sunshine Wharf
34	Thames Refinery
	Barking and Dagenham
35	Welbeck Wharf
36	Alexander Wharf (new)
37	Pinns Wharf
38	Steel Wharf (formerly Kierbeck & Steel Wharves)
39	Rippleway Wharf (including Debden Wharf)
40	Docklands Wharf
41	Victoria Stone Wharf
42	DePass Wharf
43	Dagenham Wharf (formerly RMC Roadstone)
44	Pinnacle Terminal (formerly Thunderer Jetty)
45	No 1 Western Extension (White Mountain Roadstone)
46	East Jetty (formerly Van Dalen – Hunts Wharf)
47	No 4 Jetty (formerly Hanson Aggregates)
48	Ford Dagenham Terminal
	Havering
49	Phoenix Wharf
50	Halfway Wharf (formerly Tilda Rice)

Key

- 1 - retain wharf designation - in existing wharf use, so no identifiable change to use
- 2a - retained wharf designation - in use for other industrial/commercial use including storage only, but promotion of reactivation, so potential new use - industrial
- 2b - retained wharf designation - not in any use, but promotion of reactivation, so potential new use - industrial
- 3 - released wharf - in use for other industrial/commercial use, so no identifiable change of use
- 4 - released wharf - not in any use so potential new use - potentially residential or industrial/commercial
- 5 - new wharf designation - in existing wharf use, so no identified change to use

Map 1 Locations of European Sites and wharf sites

