City of London Corporation

HRA of the City of London Local Plan

Revised Proposed Submission Draft

Final report
Prepared by LUC
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Revised Proposed Submission Draft

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Chapter 1
Introduction

1.1 LUC has been appointed by the City of London Corporation to carry out a Habitats Regulations Assessment (HRA) of the City of London Local Plan. This report sets out the findings of that process.

1.2 The purpose of the HRA is to determine whether any of the policies being proposed for the Local Plan, in combination with other plans and projects, are likely to have adverse effects on the integrity of any Special Area of Conservation (SAC), Special Protection Area (SPA) or Ramsar site and, if so, to identify any avoidance or reduction measures that would allow these effects to be ruled out.

Background to the City of London Local Plan

1.3 The City of London Corporation is producing a Local Plan in order to provide the policy framework for development in the City up to 2040. The current City of London Local Plan was adopted in January 2015 and plans for development requirements up to 2026. The new Local Plan, titled City Plan 2040, will replace this**.**

1.4 The first stage of public engagement on the Local Plan took place in 2016 when the City of London Corporation published a report seeking views on the planning issues that need to be addressed and options for policies to deal with them. Copies of the comments received have been published on the City's website.

1.5 Following this, a draft Plan was produced in November 2018 for public consultation and was subject to HRA Screening.

1.6 The views obtained from this consultation were taken into account by the City of London Corporation in preparing a Proposed Submission version of the Local Plan that was subject to consultation in Spring 2021.

1.7 The Corporation decided not to submit the City Plan immediately for examination but instead to undertake further evidence work and revise the City Plan in light of the issues raised during the pre-submission consultation. These issues primarily related to:

- Tall buildings and their impacts on heritage, including an issue of 'nonconformity' with the London Plan.
- Sustainability, in particular the approaches to embodied carbon and demolition.

- The need for more recent evidence on office and retail demand, given shifting working patterns and changes to shopping behaviours following Covid-19.
- How inclusive approaches can be woven into more aspects of the City Plan, especially as the City aims to widen its appeal to visitors.

1.8 It was also decided to extend the end date of the City Plan from 2036 to 2040, in order to align with the net zero carbon target for the Square Mile in the Climate Action Strategy and to allow for the Plan to cover a 15 year timeframe, as required by national policy.

1.9 The Revised Proposed Submission Draft City Plan 2040 is intended to be published for Regulation 19 consultation in Spring/Summer 2024 before submission for Examination in Winter 2024 and adoption in 2025. The Revised Proposed Submission Draft Plan is the subject of this HRA report.

Previous HRA work

1.10 As part of the City Plan 2015, an HRA Screening was carried out in November 2012. The HRA Screening concluded that Appropriate Assessment of that Plan was not required.

1.11 An HRA Screening was then undertaken in October 2018 of the Draft City Plan and updated in March 2021 to consider the Proposed Submission Draft of the City Plan. No responses have been received from Natural England on the HRA work so far.

1.12

The requirement to undertake Habitats Regulations Assessment of development plans

1.13 The requirement to undertake HRA of development plans was confirmed by the amendments to the Habitats Regulations published for England and Wales in 2007[1]; the currently applicable version is the Habitats Regulations 2017, as amended[2]. When preparing its Local Plan, the City of London Corporation is therefore required by law to carry out an HRA. City of London Corporation can commission consultants to undertake HRA work on its behalf and this (the work documented in this report) is then reported to and considered by City of London Corporation as the 'competent authority'. City of London Corporation will consider this work and would usually only progress the Local Plan if it considers that the Plan will not adversely affect the integrity[3] of any 'European site', as defined below (the exception to this would be where 'imperative reasons of overriding public interest' can be demonstrated. The requirement for authorities to comply with the Habitats Regulations when preparing a Local Plan is also noted in the Government's online Planning Practice Guidance[4] (PPG).

1.14 HRA refers to the assessment of the potential effects of a development plan on one or more sites afforded the highest level of protection in the UK: SPAs and SACs. These were classified under European Union (EU) legislation but, since 1st January 2021, are protected in the UK by the Habitats Regulations 2017[5] (as amended). Although the EU Directives from which the UK's Habitats Regulations originally derived are no longer binding, the Regulations still make reference to the lists of habitats and species that the sites were designated for, which are listed in annexes to the EU Directives:

- SACs are designated under the Habitats Regulations as amended and target particular habitat types (specified in Annex 1 to the Habitats Directive[6]) and species (Annex II). The listed habitat types and species (excluding birds) are those considered to be most in need of conservation at a European level. Before EU exit day, designation of SACs also had regard to the coherence of the 'Natura 2000' network of European sites. After EU exit day, regard is had to the importance of such sites for the coherence of the UK's 'national site network'.
- SPAs are areas classified for rare and vulnerable birds (Annex I of the EU Birds Directive[7]), and for regularly occurring migratory species not listed in Annex I.

1.15 The term 'European sites' was previously commonly used in HRA to refer to 'Natura 2000' sites[8] and Ramsar sites (international designated under the Ramsar Convention). However, a Government Policy Paper[9] on changes to the Habitats Regulations 2017 post-Brexit states that:

[1] The Conservation (Natural Habitats, &c.) (Amendment) Regulations 2007 (2007) SI No. 2007/1843. TSO (The Stationery Office), London.
[2] The Conservation of Habitats and Species Regulations 2017 (2017) SI No. 2017/1012, as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (2019) SI No. 2019/579, TSO (The Stationery Office), London.
[3] The integrity of a site is the coherence of its ecological structure and function, across its whole area, that enables it to sustain the habitat, complex of habitats and/or the levels of populations of the species for which it was designated. (Source: UK Government Planning Practice Guidance)
[4] https://www.gov.uk/guidance/appropriate-assessment
[5] The Conservation of Habitats and Species Regulations 2017 (2017) SI No. 2017/1012, as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (SI 2019/579).
[6] Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora (the 'Habitats Directive')
[7] Directive 2009/147/EC of 30 November 2009 on the conservation of wild birds (the 'Birds Directive')
[8] The network of protected areas identified by the EU
[9] https://www.gov.uk/government/publications/changes-to-the-habitats-regulations-2017/changes-to-the-habitats-regulations-2017

- Any references to Natura 2000 in the 2017 Regulations and in guidance now refers to the new 'national site network'.
- The national site network includes existing SACs and SPAs; and new SACs and SPAs designated under these Regulations.
- Designated Wetlands of International Importance (known as Ramsar sites) do not form part of the national site network. Many Ramsar sites overlap with SACs and SPAs and may be designated for the same or different species and habitats.

1.16 Although Ramsar sites do not form part of the new national site network, Government guidance[10] states that:

> "Any proposals affecting the following sites would also require an HRA because these are protected by government policy:
>
> - proposed SACs
> - potential SPAs
> - Ramsar sites – wetlands of international importance (both listed and proposed)
> - areas secured as sites compensating for damage to a European site."

1.17 Furthermore, the NPPF[11] and practice guidance[12] currently state that competent authorities responsible for carrying out HRA should treat Ramsar sites in the same way as SACs and SPAs. The legislative requirement for HRA does not apply to other nationally designated wildlife sites such as Sites of Special Scientific Interest or National Nature Reserves.

1.18 For simplicity, this report uses the term 'European site' to refer to all types of designated site for which Government guidance[13] requires an HRA.

1.19 The overall purpose of an HRA is to conclude whether or not a proposal or policy, or a whole development plan would adversely affect the integrity of the European site in question. This is judged in terms of the implications of the plan for a site's 'qualifying features' (i.e. those Annex I habitats, Annex II species, and Annex I bird populations for which it has been designated). Significantly, HRA is based on the precautionary principle. Where uncertainty or doubt remains, an adverse effect should be assumed.

Structure of the HRA Screening report

1.20 This chapter has introduced the requirement to undertake HRA Screening in relation to the City of London Local Plan. The remainder of the report is structured into the following chapters:

- **Chapter 2: Approach to HRA** sets out broad approach followed and the specific tasks undertaken during the screening and Appropriate Assessment stages of the HRA.
- **Chapter 3: The Local Plan** summarises the content of the Revised Proposed Submission Draft City Plan, which is the subject of this report.
- **Chapter 4: HRA Screening** describes the findings of the screening stage of the HRA.
- **Chapter 5: Appropriate Assessment** presents the findings of the Appropriate Assessment, taking mitigation into account.
- **Chapter 6: Conclusions and next steps** summarises the HRA conclusions and describes the next steps to be undertaken.

[10] Defra and Natural England (2021) Guidance - Habitats regulations assessments: protecting a European site, https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site
[11] NPPF para 176, https://www.gov.uk/guidance/national-planning-policy-framework
[12] The HRA Handbook, Section A3. David Tyldesley & Associates, https://www.dtapublications.co.uk/handbook/European
[13] Defra and Natural England (2021) Guidance - Habitats regulations assessments: protecting a European site, https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site

Chapter 2
Approach to HRA

2.1 The HRA of the City of London Revised Proposed Submission Draft Local Plan has been undertaken in line with current available guidance and seeks to meet the requirements of the Habitats Regulations.·

Stages of HRA

2.2 The HRA of development plans is undertaken in stages (as described below) and should conclude whether or not a proposal would adversely affect the integrity of the European site in question.

2.3 LUC has been commissioned by the City of London Corporation to carry out HRA work on the Council's behalf, and the outputs will be reported to and considered by City of London Corporation, as the competent authority, before adopting the Plan.

2.4 The HRA also requires close working with Natural England as the statutory nature conservation body[14] in order to obtain the necessary information, agree the process, outcomes and mitigation proposals. The Environment Agency, while not a statutory consultee for the HRA, is also in a strong position to provide advice and information throughout the process as it is required to undertake HRA for its existing licences and future licensing of activities.

Requirements of the Habitats Regulations

2.5 In assessing the effects of a Local Plan in accordance with Regulation 105 of the Conservation of Habitats and Species Regulations 2017 (as amended[15]) (the 'Habitats Regulations'), there are potentially two tests to be applied by the competent authority: a 'Significance Test', followed if necessary by an Appropriate Assessment which would inform the 'Integrity Test'. The relevant sequence of questions is as follows:

- Step 1: Under Reg. 105(1)(b), consider whether the plan is directly connected with or necessary to the management of the sites. If not, proceed to Step 2.
- Step 2: Under Reg. 105(1)(a) consider whether the plan is likely to have a significant effect on a European site, either alone or in combination with other plans or

[14] Regulation 5 of the Habitats Regulations 2017.

[15] The Conservation of Habitats and Species Regulations 2017 (2017) SI No. 2017/1012, as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (SI 2019/579).

projects (the 'Significance Test'). If yes, proceed to Step 3.

2.6 [Steps 1 and 2 are undertaken as part of Stage 1: HRA Screening, shown in Table 2.1.]

- Step 3: Under Reg. 105(1), make an Appropriate Assessment of the implications for the European site in view of its current conservation objectives (the 'Integrity Test'). In so doing, it is mandatory under Reg. 105(2) to consult Natural England, and optional under Reg. 105(3) to take the opinion of the general public.

2.7 [This step is undertaken during Stage 2: Appropriate Assessment, shown in Table 2.1.]

- Step 4: In accordance with Reg. 105(4), but subject to Reg. 107, give effect to the land use plan only after having ascertained that the plan would not adversely affect the integrity of a European site.

2.8 [This step follows Stage 2 where a finding of 'no adverse effect' is concluded. If it cannot be it proceeds to Step 5 as part of Stage 3 of the HRA process]

- Step 5: Under Reg. 107, if Step 4 is unable to rule out adverse effects on the integrity of a European site and no alternative solutions exist then the competent authority may nevertheless agree to the plan or project if it must be carried out for 'imperative reasons of overriding public interest' (IROPI).

2.9 [This step is undertaken during Stage 3: Assessment where no alternatives exist and adverse impacts remain taking into account mitigation shown in Table 2.1]

Typical stages

2.10 **Table 2.1** summarises the stages and associated tasks and outcomes typically involved in carrying out a full HRA of a development plan, based on various guidance documents[16, 17, 18].

Table 2.1: Stages of HRA

Stage	Task	Outcome
Stage 1: HRA Screening	Description of the development plan and confirmation that it is not directly connected with or necessary to the management of European sites. Identification of potentially affected European sites and their conservation objectives[19]. Assessment of likely significant effects of the development plan alone or in combination with other plans and projects, prior to consideration of avoidance or reduction ('mitigation') measures[20].	Where effects are unlikely, prepare a 'finding of no significant effect report'. Where effects judged likely, or lack of information to prove otherwise, proceed to Stage 2.
Stage 2: Appropriate Assessment (where Stage 1 does not rule out likely significant effects)	Information gathering (development plan and European sites[21]). Impact prediction. Evaluation of development plan impacts in view of conservation objectives. Where impacts are considered to affect qualifying features, identify how these	Appropriate assessment report describing the plan, European site baseline conditions, the adverse effects of the plan on the European site, how these effects will be avoided or reduced, including the mechanisms and timescale for these mitigation measures.

[16] UK Government Planning Practice Guidance, https://www.gov.uk/guidance/appropriate-assessment
[17] European Commission (2001) Assessment of plans and projects significantly affecting European Sites. Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC
[18] The HRA Handbook. David Tyldesley & Associates
[19] Conservation objectives are published by Natural England for SACs and SPAs:
[20] In line with the CJEU judgment in Case C-323/17 People Over Wind v Coillte Teoranta, mitigation must only be taken into consideration at this stage and not during Stage 1: HRA Screening.
[21] In addition to European site citations and conservation objectives, key information sources for understanding factors contributing to the integrity of European sites include (where available) conservation objectives supplementary advice and Site Improvement Plans prepared by Natural England.

Stage	Task	Outcome
	effects will be avoided or reduced ('mitigation').	If effects remain after all alternatives and mitigation measures have been considered proceed to Stage 3.
Stage 3: Assessment where no alternatives exist and adverse impacts remain taking into account mitigation	Identify 'imperative reasons of overriding public interest' (IROPI). Demonstrate no alternatives exist. Identify potential compensatory measures.	This stage should be avoided if at all possible. The test of IROPI and the requirements for compensation are extremely onerous.

2.11 It is normally anticipated that an emphasis on Stages 1 and 2 of this process will, through a series of iterations, help ensure that potential adverse effects are identified and eliminated through the inclusion of mitigation measures designed to avoid, reduce or abate effects. The need to consider alternatives could imply more onerous changes to a plan document. It is generally understood that so called 'imperative reasons of overriding public interest' (IROPI) are likely to be justified only very occasionally and would involve engagement with the Government.

Case law

2.12 This HRA has been prepared in accordance with recent case law findings, including most notably the recent 'People over Wind' and 'Holohan' rulings from the Court of Justice for the European Union (CJEU).

2.13 The *People over Wind, Peter Sweetman v Coillte Teoranta* (April 2018) judgment ruled that Article 6(3) of the Habitats Directive should be interpreted as meaning that mitigation measures should be assessed as part of an Appropriate Assessment and should not be taken into account at the screening stage. The precise wording of the ruling is as follows:

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

2.14 In light of the above, the HRA screening stage does not rely upon mitigation measures to draw conclusions as to whether the Local Plan could result in likely significant effects on European sites, with any such measures being considered at the Appropriate Assessment stage as relevant.

2.15 This HRA also fully considers the *Holohan v An Bord Pleanala* (November 2018) judgement which stated that:

> "Article 6(3) of Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora must be interpreted as meaning that an 'appropriate assessment' must, on the one hand, catalogue the entirety of habitat types and species for which a site is protected, and, on the other, identify and examine both the implications of the proposed project for the species present on that site, and for which that site has not been listed, and the implications for habitat types and species to be found outside the boundaries of that site, provided that those implications are liable to affect the conservation objectives of the site.
>
> Article 6(3) of Directive 92/43 must be interpreted as meaning that the competent authority is permitted to grant to a plan or project consent which leaves the developer free to determine subsequently certain parameters relating to the construction phase, such as the location of the construction compound and haul routes, only if that authority is certain that the development consent granted establishes conditions that are strict enough to guarantee that those parameters will not adversely affect the integrity of the site.
>
> Article 6(3) of Directive 92/43 must be interpreted as meaning that, where the competent authority rejects the findings in a scientific expert opinion recommending that additional information be obtained, the 'appropriate assessment' must include an explicit and detailed statement of reasons capable of dispelling all reasonable scientific doubt concerning the effects of the work envisaged on the site concerned."

2.16 Similarly, effects on both qualifying and supporting habitats and species on functionally linked land (FLL) or habitat have been considered in the HRA, in line with the High Court judgment in RSPB and others v Secretary of State and London Ashford Airport Ltd [2014 EWHC 1523 Admin] (paragraph 27), which stated that:

> "There is no authority on the significance of the non-statutory status of the FLL. However, the fact that the FLL was not within a protected site does not mean that the effect which a deterioration in its quality or function could have on a protected site is to be ignored. The indirect effect was still protected. Although the question of its legal status was mooted, I am satisfied …. that while no particular legal status attaches to FLL, the fact that land is functionally linked to protected land means that the indirectly adverse effects on a protected site, produced by effects on FLL, are scrutinised in the same legal framework just as are the direct effects of acts carried out on the protected site itself. That is the only sensible and purposive approach where a species or effect is not confined by a line on a map or boundary fence. This is particularly important where the boundaries of designated sites are drawn tightly as may be the UK practice".

2.17 In undertaking this HRA, LUC has therefore considered the potential for effects on species and habitats, including those not listed as qualifying features, to result in secondary effects upon the qualifying features of European sites, including the potential for complex interactions and dependencies. In addition, the potential for offsite impacts, such as through impacts to functionally linked land, and or species and habitats located beyond the boundaries of European site, but which may be important in supporting the

ecological processes of the qualifying features, has also been considered in this HRA.

2.18 In addition to this, the HRA takes into consideration the 'Wealden' judgement from the CJEU.

2.19 *Wealden District Council v Secretary of State for Communities and Local Government, Lewes District Council and South Downs National Park Authority* (2017) ruled that it was not appropriate to scope out the need for a detailed assessment for an individual plan or project based on the annual average daily traffic (AADT) figures detailed in the Design Manual for Roads and Bridges or the critical loads used by Defra or Environmental Agency without considering the in-combination impacts with other plans and projects.

2.20 In light of this judgement, HRA therefore considers traffic growth based on the effects of development from the Local Plan in combination with other drivers of growth such as development proposed in neighbouring districts and demographic change.

2.21 The HRA also takes into account the Grace and Sweetman (July 2018) judgement from the CJEU which stated that:

> ""there is a distinction to be drawn between protective measures forming part of a project and intended avoid or reduce any direct adverse effects that may be caused by the project in order to ensure that the project does not adversely affect the integrity of the area, which are covered by Article 6(3), and measures which, in accordance with Article 6(4), are aimed at compensating for the negative effects of the project on a protected area and cannot be taken into account in the assessment of the implications of the project".
>
> "As a general rule, any positive effects of the future creation of a new habitat, which is aimed at compensating for the loss of area and quality of that habitat type in a protected area, are highly difficult to forecast with any degree of certainty or will be visible only in the future"
>
> "A mitigation strategy may only be taken into account at AA (a.6(3)) where the competent authority is "sufficiently certain that a measure will make an effective contribution to avoiding harm, guaranteeing beyond all reasonable doubt that the project will not adversely affect the integrity of the area"
>
> • Otherwise it falls to be considered to be a compensatory measure to be considered under a.6(4) only where there are "imperative reasons of overriding public interest"

2.22 The Appropriate Assessment of the Local Plan therefore only considers the existence of measures to avoid or reduce its direct adverse effects (mitigation) if the expected benefits of those measures are beyond reasonable doubt at the time of the assessment.

Identifying types of potential impact from the Local Plan

2.23 Development such as new homes, employment space and infrastructure that is associated with development plans has the potential to impact upon European sites in a variety of ways. The following potential impacts could arise as a result of the types of development provided for by a local plan:

- Physical loss of/damage to habitat;
- Non-physical disturbance (noise, vibration and light);
- Non-toxic contamination;
- Air pollution;
- Recreation pressure; and
- Changes to hydrology including water quality and quantity.

2.24 In this case, physical loss of habitat, non-toxic contamination and non-physical disturbance (noise, vibration and light pollution) are unlikely as there are no European sites within the City of London, although potential for effects on habitats within the City of London that are functionally linked to European sites are also considered.

2.25 For each of the Local Plan's policies, consideration is given to the type of development the policy could result in, impacts that could arise from that type of development, and then whether there is an impact pathway to any European sites sensitive to that impact, as described below. Where a policy provides for a range of scales of development, depending on the spatial option pursued, consideration is given to any difference in potential scale of impact.

2.26 All site allocations are considered by the HRA, to determine which groups of sites could contribute to the different types of impact (for example residential sites in proximity to European sites are more likely to contribute to recreation pressure).

Identification of European Sites relevant to the HRA

2.27 In order to begin the search of European sites that could potentially be affected by a development, it is established practice in HRA to consider sites within the local planning authority area covered by the plan, and other sites that may be affected beyond this area.

2.28 A distance of 15km from the boundary of the plan area is typically used in the first instance to identify European sites

with the potential to be affected by the proposals within a development plan. Consideration is then given to whether any more distant European sites may be functionally connected to the plan area, for example through hydrological pathways or recreational visits by residents. The 15km distance has been agreed with Natural England for HRAs elsewhere and is considered precautionary.

2.29 As illustrated in Figure 2.1, no European sites lie within the City of London boundary but four lie wholly or partially within the 15km buffer area:

- Epping Forest SAC (c.8.7km from City of London);
- Lee Valley SPA and Ramsar Site (c.6.0km from City of London);
- Richmond Park SAC (c.11.9km from City of London); and,
- Wimbledon Common SAC (c.10.4km from City of London).

2.30 Thames Estuary and Marshes SPA / Ramsar Site (c.35km away) and the Outer Thames Estuary SPA beyond it (c.55km away) are also linked to the City of London via the River Thames, which marks the southern edge of the borough. However, these sites are a considerable distance away from the Plan area (in a direct line; further along the course of the river) and are designated for bird species. The potential impact pathways from the City Plan are water pollution and changes to habitats on which the qualifying bird species rely. No other European sites are considered to be connected to the Plan area.

2.31 Detailed information about each European site is provided in **Appendix A**, described with reference to Standard Data Forms for the SPAs and SACs, and Natural England's Site Improvement Plans[22]. Natural England's conservation objectives[23] and any supplementary advice on conserving and restoring site features for the SPAs and SACs have also been reviewed. All of the conservation objectives state that site integrity must be maintained or restored by maintaining or restoring the habitats of qualifying features, the supporting processes on which they rely, and populations of qualifying species.

2.32 Together, the text of the Local Plan and information on the European sites have been used to confirm that the plan is not directly connected to or necessary for the management of any of the sites.

Functionally linked habitats

2.33 The assessment also takes into account areas that may be functionally linked to the European sites (identified in **Chapter 4**). The term 'functional linkage' can be used to refer to the role or 'function' that land or other habitats beyond the boundary of a European site might fulfil in supporting the species populations for which the site was designated or classified. Such an area is therefore 'linked' to the site in question because it provides a (potentially important) role in maintaining or restoring a protected population at favourable conservation status.

2.34 While the boundary of a European site will usually be drawn to include key supporting habitat for a qualifying species, this cannot always be the case where the population for which a site is designated or classified is particularly mobile. Individuals of the population will not necessarily remain in the site all the time. Sometimes, the mobility of qualifying species is considerable and may extend so far from the key habitat that forms the SAC or SPA that it would be entirely impractical to attempt to designate or classify all of the land or sea that may conceivably be used by the species. HRA therefore considers whether any qualifying species of scoped-in European sites make use of functionally linked habitats and the impacts that could affect those habitats.

2.35 Habitat loss from development in areas outside of the European site boundaries may result in likely significant effects where that habitat contributes towards maintaining the interest feature for which the European site is designated. This includes land that may provide offsite movement corridors or foraging and sheltering habitat for mobile species such as birds, bats and fish. European sites susceptible to the indirect effects of habitat loss are restricted to those sites with qualifying species that rely on offsite habitat. These are:

- Epping Forest SAC (stag beetle);
- Lee Valley SPA and Ramsar Site (birds);
- Richmond Park SAC (stag beetle); and,
- Wimbledon Common SAC (stag beetle).

Stag beetle

2.36 Stag beetle *lucanus cervus* is one of the qualifying features of Epping Forest SAC, Richmond Park SAC and Wimbledon Forest SAC. This species relies on woodland, hedgerows, orchards, parks and gardens habitat that support deadwood features, and are known to have a limited dispersal

[22] Natural England site improvement plans, https://publications.naturalengland.org.uk/category/6149691318206464

[23] Natural England conservation objectives https://publications.naturalengland.org.uk/category/6528471664689152

of up to 2km[24]. The closest point of the SACs from the European Sites is:

- Epping Forest SAC (c.8.7km);
- Richmond Park SAC (c.11.9km); and,
- Wimbledon Common SAC (c.10.4km)

2.37 Therefore, stag beetles from these sites will not rely on habitats within the City of London and there are no potential effects on functionally linked habitats used by stag beetles.

Birds

2.38 Lee Valley SPA and Ramsar Site is designated for non-breeding great bittern *botaurus stellaris*, northern shoveler *anas clypeata* (wintering) and gadwall *anas strepera* (wintering).

2.39 The Thames Estuary and Marshes SPA and Ramsar Site is located c.35km for the City of London boundary and is designated for wintering avocet *Recurvirostra avosetta*, hen harrier *circus cyaneus*, ringer plover *Charadrius hiaticula*, grey plover *Pluvialis squatarola*, dunlin *calidris alphina alphina*, knot *calidris canutus islandica*, black-tailed godwit *limosa limosa islandica* and redshank *Tringa tetanus tetanus*. The Outer Thames Estuary SPA, 55km away, is designated for red-throated diver *Gavia stellata*, common tern *Sterna hirundo* and little tern *Sternula albifrons*.

2.40 The tidal River Thames, which passes along the southern edge of the City of London, is designated as a Site of Metropolitan Importance for Nature Conservation (SMINC). However, this includes the whole of the Thames in London and its tidal tributaries; and some parts of the Thames are of greater conservation value than others. The London Biodiversity Plan Habitat Action Plan for the Tidal Thames is currently being updated; however previous audit work[25] of the SMINC states, in relation to birds:

> "The birds of the River Thames are less influenced by the salinity gradient of the river and more by the extent of foreshore exposed at low tide. Birds such as dunlin, ringed plover and shelduck, which feed on invertebrates in the intertidal mud, are largely confined to the more extensive mudflats downstream of the Thames Barrier. Less specialised feeders such as teal and pintail (which is now rare in London) can occur on any suitable, undisturbed part of the river. Two fish-eating species, cormorant and grey heron, frequent the entire length of the river and can often be seen fishing the Thames in the centre of London."

and

> "Areas of intertidal habitat occur along the entire length of the tidal Thames, but where the flood defences have particularly restricted the natural extent of the river channel the intertidal habitat is necessarily limited - although still of importance, particularly for fish and invertebrates. The most extensive areas of intertidal habitat occur downstream of Tower Bridge where the flood defences are set further back from the main channel. "

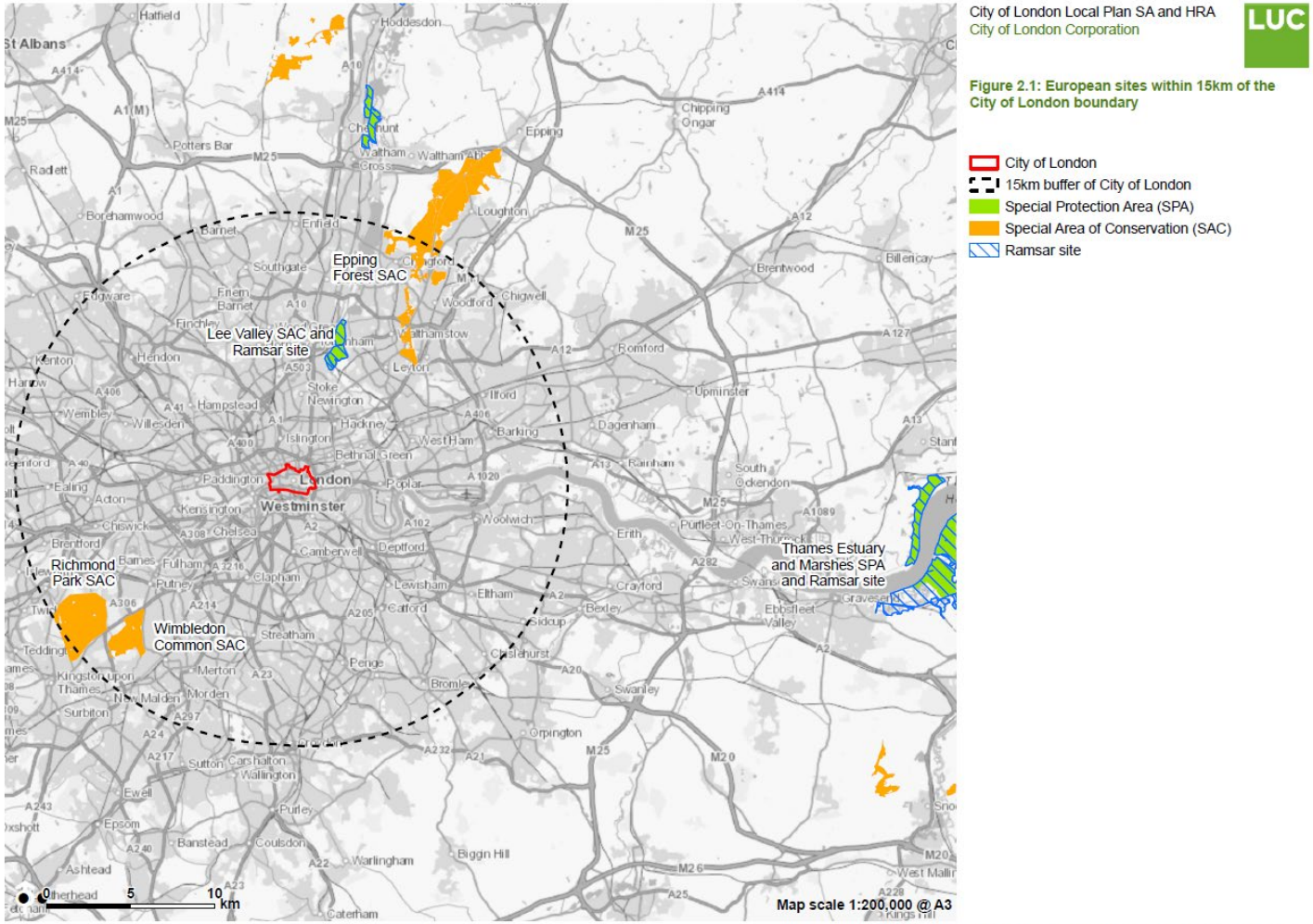
2.41 The City of London has 2.5ha of the 310ha of intertidal habitat along the Thames as a whole. It is considered unlikely that this portion of the Thames, which also has high levels of disturbance from river traffic, provides significant habitat for birds from either the Lee Valley SPA and Ramsar site, Thames Estuary SPA and Ramsar site or the Outer Thames Estuary SPA and Ramsar site. There are therefore no potential effects on functionally linked habitats used by birds.

2.42 All effects on functionally linked habitats have been scoped out of further assessment.

[24] Radio-telemetric monitoring of dispersing stag beetles: implications for conservation, http://onlinelibrary.wiley.com/doi/10.1111/j.1469-7998.2006.00282.x/abstract

[25] https://www.lbp.org.uk/02audit_pdfs/the_audit_full.pdf

Figure 2.1: European sites within 15km of the City of London boundary



Assessment of 'likely significant effects'

2.43 As required under Regulation 105 of the Conservation of Habitats and Species Regulations 2017[26] (as amended) (the 'Habitats Regulations'), an assessment has been undertaken of the 'likely significant effects' of the Plan. The assessment has been prepared in order to identify which policies or site allocations would be likely to have a significant effect on European sites.

2.44 Consideration has been given to the potential for the development proposed to result in significant effects of the types listed within paragraph 2.23.

Interpretation of 'likely significant effect'

2.45 Relevant case law helps to interpret when effects should be considered as a likely significant effect, when carrying out HRA of a land use plan.

2.46 In the Waddenzee case[27], the European Court of Justice ruled on the interpretation of Article 6(3) of the Habitats Directive (translated into Reg. 102 in the Habitats Regulations), including that:

2.47 An effect should be considered 'likely', *"if it cannot be excluded, on the basis of objective information, that it will have a significant effect on the site"* (para 44). An effect should be considered 'significant', *"if it undermines the conservation objectives"* (para 48). Where a plan or project has an effect on a site "*but is not likely to undermine its conservation objectives, it cannot be considered likely to have a significant effect on the site concerned"* (para 47).

2.48 An opinion delivered to the Court of Justice of the European Union[28] commented that:

> "The requirement that an effect in question be 'significant' exists in order to lay down a de minimis threshold. Plans or projects that have no appreciable effect on the site are thereby excluded. If all plans or projects capable of having any effect whatsoever on the site were to be caught by Article 6(3), activities on or near the site would risk being impossible by reason of legislative overkill."

2.49 This opinion (the 'Sweetman' case) therefore allows for the authorisation of plans and projects whose possible effects, alone or in combination, can be considered 'trivial' or *de minimis*; referring to such cases as those *"that have no appreciable effect on the site"*. In practice such effects could be screened out as having no likely significant effect – they would be 'insignificant'.

2.50 The HRA screening assessment therefore considers whether the Local Plan policies could have likely significant effects either alone or in combination.

Screening assessment

2.51 A risk-based approach, involving the application of the precautionary principle, has been adopted in the assessment, such that a conclusion of 'no significant effect' has only been reached where it is considered unlikely, based on current knowledge and the information available, that a Local Plan policy or site allocation would have a significant effect on a European site.

2.52 A screening matrix has been prepared (**Appendix B**) that considers the potential for likely significant effects resulting from each policy in the Local Plan. A 'traffic light' approach has been used in the screening matrix to record the likely impacts of each policy on European sites and their qualifying habitats and species, using the colour categories shown below. Consideration was given to whether the policy will result in development and therefore could result in an impact on a European Site. there are also policies covering nine key areas of change.

Table 2.2: Key to 'traffic light' colours used in the screening matrix

Red	There are likely to be significant effects (Appropriate Assessment required).
Amber	There may be significant effects, but this is currently uncertain (Appropriate Assessment required).
Green	There are unlikely to be significant effects (Appropriate Assessment not required).

2.53 The screening assessment is conducted without taking mitigation (e.g. embedded in policy) into account, in accordance with the 'People over Wind' judgment.

2.54 For some types of impacts, the potential for likely significant effects has been determined on a proximity basis, using GIS data to determine the proximity of potential development locations to the European sites that are the subject of the assessment. However, there are many uncertainties associated with using set distances as there are very few standards available as a guide to how far impacts will travel. Therefore, where assumptions have been made, these were designed to be precautionary, as set out in Chapter 4.

[26] SI No. 2017/2012
[27] *ECJ Case C-127/02 "Waddenzee"* Jan 2004.
[28] *Advocate General's Opinion to CJEU in Case C-258/11 Sweetman and others v An Bord Pleanala* 22nd Nov 2012.

In-combination effects

2.55 Regulation 105 of the Habitats Regulations 2017 requires an Appropriate Assessment where "*a land use plan is likely to have a significant effect on a European site (either alone or in combination with other plans or projects) and is not directly connected with or necessary to the management of the site".* Therefore, the Screening assessment must consider whether any impacts identified from the Local Plan may combine with other plans or projects to give rise to significant effects in-combination.

2.56 Where the Local Plan is likely to have an effect on its own e.g. due to water pollution (due to impact pathways being present) but it is not likely to be significant, the in-combination assessment at Screening stage needs to determine whether there may also be the same types of effect from other plans or projects that could combine with the Local Plan to produce a significant effect. If so, this likely significant effect (e.g. water pollution) arising from the Local Plan in combination with other plans or projects, would then need to be considered through the Appropriate Assessment stage to determine if water pollution would have an adverse effect on integrity of the relevant European site. Where the screening assessment concludes that there is no impact pathway between development proposed in the Local Plan and the conditions necessary to maintain qualifying features of a European site, then there will be no in-combination effects to assess at the Screening or Appropriate Assessment stage. Where the screening assessment concludes that likely significant effects from the Local Plan alone cannot be ruled out, this potential effect is carried forward for more detailed consideration (including of in-combination effects) at the Appropriate Assessment stage and no consideration of in-combination effects is necessary at the Screening stage. This approach accords with current guidance contained in the HRA Handbook[29].

2.57 The in-combination assessment will focus on planned growth (including housing, employment, transport, minerals and waste) around the affected site, or along the impact corridor, for example, if impacts could arise as a result of changes to a waterway, then planned growth in local authorities along that waterway will be considered. Where relevant, any strategic projects in the area that could have in-combination effects with the Local Plan will also be identified and reviewed.

2.58 The HRA Handbook suggests the following plans and projects may be relevant to consider as part of the in-combination assessment:

- Applications lodged but not yet determined, including refusals subject to an outstanding appeal or legal challenge;
- Projects subject to periodic review e.g. annual licences, during the time that their renewal is under consideration;
- Projects authorised but not yet started'
- Projects started but not yet completed;
- Known projects that do not require external authorisation;
- Proposals in adopted plans;
- Proposals in draft plans formally published or submitted for final consultation, examination or adoption.

2.59 The need for in-combination assessment also arises at the Appropriate Assessment stage, as discussed in the Appropriate Assessment section below.

Appropriate Assessment

2.60 Following the screening stage, if likely significant effects on European sites are unable to be ruled out, the plan-making authority is required under Regulation 105 of the Habitats Regulations to make an 'Appropriate Assessment' of the implications of the plan for European sites, in view of their conservation objectives. Appropriate Assessment should consider the impacts of the plan (either alone or in combination with other projects or plans) on the integrity of European sites with respect to their conservation objectives and to their structure and function This will involve detailed consideration of plans and projects with the potential for in-combination effects, where relevant.

2.61 Where likely significant effects in-combination cannot be ruled out at the screening stage, the Appropriate Assessment will gather the information necessary to consider these, for example traffic data for air pollution, or housing provisions and major site allocations in neighbouring authorities for recreation pressure.

2.62 Appropriate Assessment will also identify potential mitigation measures where adverse effects on integrity cannot be ruled out.

Assessing the effects on site integrity

2.63 A site's integrity depends on it being able to sustain its 'qualifying features' (i.e. the habitats and species for which it has been designated) and to ensure their continued viability. The Holohan judgement also clarifies that effects on species and habitats not listed as qualifying features, but which could

[29] David Tyldesley and Associates (undated) The HRA Handbook (Section A3) – a subscription based online guidance document

result in secondary effects upon the qualifying features of European sites also need to be considered. The Appropriate Assessment, if required, will build upon the information set out in **Appendix A** of this report, to consider the characteristics of supporting habitats and species that could be affected by impacts identified at the screening stage.

2.64 A high degree of integrity at a site is considered to exist where the potential to meet a site's conservation objectives is realised and where the site is capable of self-repair and renewal with a minimum of external management support.

2.65 A conclusion needs to be reached as to whether or not the Local Plan would adversely affect the integrity of a European site. Assessing effects on a site's integrity involves considering whether the predicted impacts of the Local Plan policies and/or sites (either alone or in combination) have the potential to:

- Cause delays to the achievement of conservation objectives for the site.
- Interrupt progress towards the achievement of conservation objectives for the site.
- Disrupt those factors that help to maintain the favourable conditions of the site.
- Interfere with the balance, distribution and density of key species that are the indicators of the favourable condition of the site.
- Cause changes to the vital defining aspects (e.g. nutrient balance) that determine how the site functions as a habitat or ecosystem.
- Change the dynamics of relationships that define the structure or function of the site (e.g. relationships between soil and water, or animals and plants).
- Interfere with anticipated natural changes to the site.
- Reduce the extent of key habitats or the population of key species.
- Reduce the diversity of the site.
- Result in disturbance that could affect the population, density or balance between key species.
- Result in fragmentation.
- Result in the loss of key features[30].

2.66 The conservation objectives for each SAC and SPA (**Appendix A**) are generally to maintain the qualifying features in favourable condition. Natural England does not define conservation objectives for Ramsar sites but these can often be inferred from those for co-located SAC or SPA features. The Site Improvement Plans for each site provide a high level overview of the issues (both current and predicted) affecting the condition of the designated features on the site(s) and outline the priority measures required to improve the condition of the features. For some European Sites, supplementary Advice to the Conservation Objectives is also available from Natural England, which provides the ecological characteristics of designated species and habitats within a European Site. An Appropriate Assessment draws on these to help to understand what is needed to maintain the integrity of the European sites.

2.67 For each European site where an uncertain or likely significant effect is identified in relation to the Local Plan, the Appropriate Assessment sets out the potential impacts and makes a judgement (based on the information available) on whether the impact will have an adverse effect on the integrity of the site. Consideration is given to the potential for mitigation measures to be implemented that could reduce the likelihood or severity of the potential impacts such that there would not be an adverse effect on the integrity of the European site.

[30] David Tyldesley and Associates (undated) The HRA Handbook (Section A3) – a subscription based online guidance document

Chapter 3
The Local Plan

3.1 The City Plan 2040 is the local plan for the City of London. It is a plan for the development of the Square Mile, setting out what type of development the City Corporation expects to take place and where. The City Plan sets out the City Corporation's strategic priorities for planning the Square Mile, together with policies that guide decisions on planning applications.

3.2 The version of the City Plan assessed by this HRA report is the Revised Proposed Submission Draft City Plan.

Policies

3.3 Policies in the Revised Proposed Submission Draft City Plan are presented under each of the following sections:

- Health, inclusion and safety;
- Housing;
- Offices;
- Retail;
- Culture and visitors;
- Infrastructure;
- Design;
- Transport;
- Heritage and tall buildings;
- Open spaces and green infrastructure;
- Climate resilience;
- The Temples, the Thames policy area and the key areas of change; and
- Implementation.

Housing and employment land provision

3.4 The City Plan is required to be in general conformity with the London Plan, which sets a housing target for the City and the London boroughs. The London Plan's strategic framework includes Policy SD5 which indicates that residential development is inappropriate in the commercial core of the City of London. The City Plan is therefore required to provide a relatively small 1,460 new homes to meet its housing needs, of which 740 are to be provided on small sites of less than 0.25ha. The Revised Proposed Submission Draft City Plan

makes provision for 1,706 net additional residential units in the City during the period 2025/26 to 2039/40, with the annual average delivery rate continuing beyond 2028/29 until such time as the London Plan is further reviewed. The City Plan does not allocate any specific sites for development but rather states that new housing will be located on suitable sites in or near identified residential areas.

3.5 In addition, the plan makes provision to increase the City's office floorspace stock by a minimum of 1,200,000m^2 net during the period 2021 to 2040, phased as follows:

- 2021 - 2026 500,000m^2
- 2026 - 2031 400,000m^2
- 2031 - 2036 200,000m^2
- 2036 - 2040 100,000m^2

Chapter 4
HRA Screening

4.1 The HRA screening of the Local Plan has identified that Appropriate Assessment will be required, as likely significant effects from the plan's policies and site allocations could not be ruled out through screening. The reasoning for this is explained below.

4.2 **Appendix B** sets out the screening of each policy in the City Plan, and this chapter summarises the findings of that process.

Physical damage to or loss of habitat

4.3 Any development resulting from the Local Plan would take place within the City of London. Therefore, only European sites within the boundary of the City of London have the potential to be affected by direct physical damage and habitat loss. No European sites lie within the City of London and therefore none are susceptible to physical damage to or loss of habitat from the Local Plan.

Therefore, no Likely Significant Effects are predicted as a result of physical damage or loss of habitat at European sites.

Non-physical disturbance (noise, vibration, visual disturbance and light)

4.4 Noise and vibration effects, e.g. during the construction of new housing or other development, are most likely to disturb bird species and are thus a key consideration with respect to European sites where birds are the qualifying features, although such effects may also impact upon some mammals and fish species.

4.5 Artificial lighting at night (e.g. from street lamps, flood lighting and security lights) is most likely to affect bat populations and some nocturnal bird species, and therefore have an adverse effect on the integrity of European sites where bats or nocturnal birds are a qualifying feature. Some bird species which are not strictly nocturnal, such as the curlew can also be adversely affected by artificial lighting.

4.6 It has been assumed (on a precautionary basis and based on our experience of previous HRAs and consultation with Natural England) that the effects of noise, vibration, visual disturbance and light pollution are capable of causing an adverse effect if development takes place within 500m of a

European site (or functionally linked habitats) with qualifying features sensitive to these disturbances.

4.7 No European Sites are located within 500m from the City of London boundary therefore none are susceptible to non-physical disturbance from the Local Plan.

Therefore, no Likely Significant Effects are predicted as a result of non-physical disturbance at European sites.

Non-toxic contamination

4.8 Non-toxic contamination can include the creation of dust which can smother habitats preventing natural processes, and may also lead to effects associated with increased sediment and dust which can potentially affect the turbidity of aquatic habitats, and can also contribute to nutrient enrichment which can lead to changes in the rate of vegetative succession and habitat composition.

4.9 The effects of non-toxic contamination are most likely to be significant if development takes place within 500m of a European site with qualifying features sensitive to these disturbances, such as riparian and wetland habitats, or sites designated for habitats and plant species. This is the distance that, in our experience, provides a robust assessment of effects in plan-level HRA and meets with the agreement of Natural England.

4.10 No European Sites are located within 500m from the City of London boundary and are therefore none are susceptible non-toxic contamination from the Local Plan.

Therefore, no Likely Significant Effects are predicted as a result of non-toxic contamination at European sites.

Air pollution

4.11 Air pollution is most likely to affect European sites where plant, soil and water habitats are the qualifying features, but some qualifying animal species may also be affected, either directly or indirectly, by deterioration in habitat as a result of air pollution. Deposition of pollutants to the ground and vegetation can alter the characteristics of the soil, affecting pH and nitrogen levels, which can then affect plant health, productivity and species composition.

4.12 In terms of vehicle traffic, nitrogen oxides (NO_X, i.e. NO and NO_2) are considered to be the key pollutants. Deposition of nitrogen compounds may lead to both soil and freshwater acidification, and NO_X can cause eutrophication of soils and water.

4.13 Based on the Highways Agency Design Manual for Road and Bridges (DMRB)[31] LA105 Air Quality (which was produced to provide advice regarding the design, assessment and operation of trunk roads including motorways), it is assumed that air pollution from roads is unlikely to be significant beyond 200m from the road itself. Where increases in traffic volumes are forecast, this 200m buffer needs to be applied to the relevant roads in order to make a judgement about the likely geographical extent of air pollution impacts.

4.14 The DMRB Guidance for the assessment of local air quality in relation to highways developments provides criteria that should be applied at the screening stage of an assessment of a plan or project, to ascertain whether there are likely to be significant impacts associated with routes or corridors. Based on the DMRB guidance, affected roads which should be assessed are those where:

- Daily traffic flows will change by 1,000 AADT (Annual Average Daily Traffic) or more; or
- Heavy duty vehicle (HDV) flows will change by 200 AADT or more; or
- Daily average speed will change by 10km/hr or more; or
- Peak hour speed will change by 20km/hr or more; or
- Road alignment will change by 5m or more.

4.15 Where significant increases in traffic are possible on roads within 200m of European sites, traffic forecast data may be needed to determine if increases in vehicle traffic are likely to be significant. In line with the Wealden judgment , the traffic growth considered by the HRA should be based on the effects of development provided for by the Local Plan in combination with other drivers of growth such as development proposed in neighbouring authorities and demographic change.

4.16 It has been assumed that only those roads forming part of the primary road network (motorways and 'A' roads) are likely to experience any significant increases in vehicle traffic as a result of development (i.e. greater than 1,000 AADT). As such, where a site is within 200m of only minor roads, no significant effect from traffic-related air pollution is considered to be the likely outcome.

4.17 Strategic Policy S9 Transport and Servicing states that development within the City will not provide any additional on-street car parking. However, the City's employment, leisure and entertainment provision attracts trips from elsewhere; these will increase as a result of the Plan.

[31] Standards for Highways (2019) Design Manual for Roads and Bridges: LA 105 – Air quality

4.18 The City of London is very well served by public transport and within the London Ultra Low Emission Zone; the vast majority of trips to/from the City will therefore be by public transport or other low/zero emission modes of transport. The risk of air pollution in proximity to European sites therefore arises due to fossil fuelled buses, taxis or servicing vehicles.

4.19 The key road corridors to or from the City of London will likely include the A3211, A4, A201, A40, A4208, A1, A1211, A501, A10, A3211, A201 and A3. The European sites within 15km of the City of London that are also within 200m of a strategic road are:

- Epping Forest SAC (M25, A114, A1199, A12, A104, A406, A121 and A112);
- Lee Valley SPA and Ramsar (A503);
- Richmond Park SAC (A3 and A219); and,
- Wimbledon Common SAC (A3 and A308).

4.20 Since mitigation (for example improvements to public transport set out in policy) cannot be taken into account at the Screening stage, air pollution has been screened in as a precaution and is considered further in Chapter 5.

It is not possible to rule out Likely Significant Effects at Epping Forest SAC, Lee Valley SPA and Ramsar site, Richmond Park SAC and Wimbledon Common SAC due to air pollution. This will be considered further in the Appropriate Assessment.

Recreation

4.21 Recreational activities and human presence can result in significant effects on European sites as a result of erosion and trampling, associated impacts such as fire and vandalism or disturbance to sensitive features, such as birds through both terrestrial and water-based forms of recreation (visual disturbance is assessed in 'non-physical disturbance', above).

4.22 The Local Plan will result in housing growth and associated population increase within the City of London. The Revised Proposed Submission Draft City Plan proposes the delivery of 1,988 new homes, plus some student accommodation and homes for older people.

4.23 European sites with qualifying bird species may be particularly susceptible to disturbance from recreation, for example from walking, dog walking, angling, illegal use of off-road vehicles and motorbikes, wildfowling, and water sports. In addition, recreation can physically damage habitat as a result of trampling and also through erosion associated with boat wash and terrestrial activities such as use of vehicles.

4.24 Each European site can be thought of as having a 'Zone of Influence' (ZOI) within which increases in population would be expected to result in likely significant effects. ZOIs are usually established following targeted visitor surveys and the findings are therefore typically specific to each European site (and often to specific areas within a European site). The findings are likely to be influenced by a number of complex and interacting factors and therefore it is not always appropriate to apply a generic or non-specific ZOI to a European Site. This is particularly the case in relation to coastal European sites, which have the potential to draw large number of visitors from areas much further afield.

4.25 Visitor studies were not available for Richmond Park SAC and Wimbledon Common SAC. Therefore, using a precautionary approach and based on the distance travelled to other non-coastal sites (for example well-established studies at the Thames Basin Heaths SPA) a ZOI of 7km is considered appropriate for these sites. Richmond Park SAC and Wimbledon Common SAC are both located beyond this distance, at 11.9km and 10.4km, respectively, from the City of London boundary. Richmond Park SAC and Wimbledon Common SAC have therefore been screened out in relation to recreation pressure.

4.26 Epping Forest SAC is subject to high levels of recreation pressure from a range of impacts including walking, mountain biking and unmanaged fires. Formal visitor surveys[32] undertaken at the SAC have established a ZOI of 6.2km, within which any residential development could have a significant effect on the SAC. However, Epping Forest SAC lies 8.7km from the City of London boundary and has therefore been screened out in relation to recreation pressure.

4.27 The Lee Valley SPA and Ramsar site does not have a formal ZOI, although if a precautionary 7km is used, then part of the City of London (the north) is within that ZOI. The site's qualifying species such as Bittern, Gadwall and Northern Shoveler, are vulnerable to disturbance, for example from dog walking. However, the nearest part of the SPA and Ramsar site to the City of London is c.1 hour away by public transport, and it is unlikely that significant numbers of visitors would travel there from the City of London, particularly for dog walking. Visitors are also well managed in the vicinity of the SPA and Ramsar site, as part of the Lea Valley Regional Park, and significant effects from recreation are not considered likely.

[32] Footprint Ecology (2019), Epping Forest Visitor Survey Report

Therefore, no Likely Significant Effects are predicted as a result of recreation pressure at European sites.

Water quantity and quality

4.28 Changes in water quantity or quality can affect European sites via three main pathways:

- Direct pollution, for example during construction or due to river transport;
- Increase requirement for wastewater treatment and discharge into watercourses; or
- Abstraction of water to supply new development.

Direct pollution

4.29 The River Thames has the potential to carry pollutants downstream to European sites downstream, i.e. the Thames Estuary and Marshes SPA and Ramsar site and the Outer Thames Estuary SPA. Since mitigation (for example pollution controls in policy) cannot be taken into account at the Screening stage, direct water pollution has been screened in as a precaution and is considered further in Chapter 5.

4.30 Lee Valley SPA and Ramsar Site is hydrologically connected to the River Thames as the River Lee meets the Thames; however this is approximately 2.4km downstream from the City of London boundary. There is therefore no impact pathway for direct pollution to affect Lee Valley SPA and Ramsar site. No other European sites have the potential to be affected by direct water pollution.

It is not possible to rule out Likely Significant Effects at Thames Estuary and Marshes SPA and Ramsar site or Outer Thames Estuary SPA due to direct water pollution. This will be considered further in the Appropriate Assessment.

Wastewater treatment

4.31 The City of London is served by the wastewater treatment works at Beckton[33], which discharges into the Thames at Barking.

4.32 The development that will be delivered through the Revised Proposed Submission Draft City Plan could combine to increase demand for water treatment. Residential development is likely to result in the most significant increases in demand for water abstraction and treatment, although employment development is also likely to contribute to increases. The level of growth proposed through the Revised Proposed Submission Draft City Plan is not likely to be significant on its own; however, in-combination with population growth across the other Boroughs of London it could result in impacts on water quality at the European sites downstream of the City of London (Thames Estuary and Marshes SPA and Ramsar site and Outer Thames Estuary SPA) due to wastewater treatment.

It is not possible to rule out Likely Significant Effects at Thames Estuary and Marshes SPA and Ramsar site and Outer Thames Estuary SPA due to wastewater treatment. This will be considered further in the Appropriate Assessment.

Water abstraction

4.33 Water is supplied to the City of London by Thames Water and is sourced predominantly from surface water[34], for example reservoirs in north and west London fed by the River Thames and River Lee. These include the Walthamstow Reservoirs which form part of the Lee Valley SPA/ and Ramsar site and development within the City of London could (without mitigation) affect water levels at this site.

4.34 Some water is also supplied from groundwater. Wimbledon Common SAC, Richmond Park SAC, Lee Valley SPA/Ramsar and Epping Forest SAC all partially overlay the Thames Basin's secondary superficial aquifer, but it is not considered that they would be significantly affected by changes in groundwater abstraction by Thames Water.

4.35 Thames Water forecasts that demand for water will increase significantly over its water resources planning period, and that water deficiencies may be an issue across London. Its Water Resources Management Plan[35] includes a number of measures to increase water supply such as wastewater re-use and some minor groundwater development. The Plan states that London's water demand currently exceeded supply at the start of the 2020-25 period, due to a significant increase in population, exacerbated by the impacts of the climate change, and increases in exports to neighbouring water companies from their current water trading agreements.

[33] Integrated Water Management Strategy for East London (incl. City of London), https://www.london.gov.uk/sites/default/files/2023-07/Sub-regional%20integrated%20water%20management%20strategy%20East%20London%20-%20July%202023.pdf

[34] Thames Water, Water Resources Management Plan 2019, https://www.thameswater.co.uk/media-library/home/about-us/regulation/water-resources/wrmp24-draft/technical-report/current-and-future-water-supply.pdf

[35] Thames Water Final Water Resources Management Plan 2019

It is not possible to rule out Likely Significant Effects at Lee Valley SPA/Ramsar due to water abstraction. This will be considered further in the Appropriate Assessment.

Summary of HRA Screening

4.36 Table 4.1 summarises the HRA Screening conclusions regarding whether there is a potential impact pathway in relation to each broad impact type to occur for each European site as a result of the Revised Proposed Submission Draft City Plan. The table indicates whether there are:

- Likely significant effects;
- No impact pathway (no effects); or
- No significant effects (impact pathways, but effects will be small in scale).

Table 4.1: Summary of screening assessment

European Site	Physical damage / loss of habitat	Non physical disturbance	Air Pollution	Recreation pressure	Water quantity / quality
Epping Forest SAC	No impact pathway	No impact pathway	Likely significant effects	No impact pathway	No significant effects
Lee Valley SPA and Ramsar site	No impact pathway	No impact pathway	Likely significant effects	No significant effects	Likely significant effects (water abstraction)
Richmond Park SAC	No impact pathway	No impact pathway	Likely significant effects	No impact pathway	No significant effects
Wimbledon Common SAC	No impact pathway	No impact pathway	Likely significant effects	No impact pathway	No significant effects
Thames Estuary and Marshes SPA / Ramsar	No impact pathway	No impact pathway	No impact pathway	No impact pathway	Likely significant effects (water treatment/ direct pollution)
Outer Thames Estuary SPA	No impact pathway	No impact pathway	No impact pathway	No impact pathway	Likely significant effects (water treatment/ direct pollution)

Policies contributing to likely significant effects

4.37 The likely significant effects relating to air pollution would arise due to development associated with the following policies. Other policies within the City Plan will not have likely significant effects, because they will not result in relevant new development (no impact pathways). Details are provided in Appendix B.

Air pollution

4.38 The main contributions would be from:

- Strategic Policy S4: Offices
- Strategic Policy S5: Retail and active frontages
- Policy CV4: Hotels

4.39 Smaller contributions would also arise from:

- Strategic Policy S1: Healthy and Inclusive City
- Policy HL6: Location and protection of social and community facilities
- Policy HL8: Sport and recreation
- Policy OF3: Temporary 'Meanwhile' Uses
- Policy RE4: Markets
- Policy CV5: Evening and Night-Time Economy
- Policy VT1: The impacts of development on transport

Water quantity and quality

4.40 The main contributions would be from:

- Strategic Policy S3: Housing
- Policy HS1: Location of New Housing
- Strategic Policy S4: Offices
- Policy CV4: Hotels

4.41 Smaller contributions would also arise from:

- Strategic Policy S1: Healthy and Inclusive City
- Policy HL6: Location and protection of social and community facilities
- Policy HL7: Public toilets
- Policy HL8: Sport and recreation
- Policy HS6: Student accommodation and hostels
- Policy HS7: Older persons housing
- Policy OF3: Temporary 'Meanwhile' Uses
- Strategic Policy S5: Retail and active frontages
- Policy RE4: Markets
- Policy CV5: Evening and Night-Time Economy
- Policy VT4: River Transport
- Strategic Policy S17: Thames Policy Area

Chapter 5
Appropriate Assessment

5.1 The HRA Screening was not able to rule out likely significant effects in relation not the following impacts:

- Air pollution due to increases in commuting traffic on roads past Epping Forest SAC, Lee Valley SPA and Ramsar site, Richmond Park SAC and Wimbledon Common SAC;
- Direct water pollution into the Thames, affecting Thames Estuary and Marshes SPA and Ramsar site and the Outer Thames Estuary SPA;
- Wastewater treatment discharges into the Thames, affecting Thames Estuary and Marshes SPA and Ramsar site and the Outer Thames Estuary SPA; and
- Water abstraction from the Lee Valley SPA and Ramsar site.

5.2 However, when mitigation is taken into account, adverse effects on the integrity of these sites can be avoided, as set out below.

Air pollution

5.3 As stated in paragraph 4.18, the City of London is very well served by public transport and within the London Ultra Low Emission Zone, but the Plan may increase trips to/from the City by fossil fuelled buses, taxis or servicing vehicles, on roads past European sites.

5.4 The following policies within the Plan provide measures that would reduce trips into the City by fossil-fuelled vehicles:

- **Policy VT3 Vehicle Parking:** states that “Development in the City should be car-free except for designated Blue Badge spaces. Where other car parking (including motorcycle parking) is exceptionally provided it must not exceed London Plan standards.” In addition, no new public car parks will be permitted and underutilised public car parks will be prioritised for alternative uses. All off street car parking must have electric vehicle charging points.
- **Policy VT2 Freight and Servicing:** requires that servicing areas are equipped with electric vehicle fast charging points. It also states that “Developers should

minimise congestion and emissions caused by servicing and deliveries through ensuring, last mile deliveries are made by foot, cycle or zero emission vehicle, and should seek opportunities to support deliveries to the City by river and rail freight. Developers will be encouraged to identify opportunities for last mile logistic hubs where appropriate."

- **Policy CV4 Hotels**: states that hotels must be in suitable locations with good access to public transport.
- **Strategic Policy S10 Active Travel and Healthy Streets:** states that the Council will put the needs of people walking and wheeling first when designing and managing streets. This will contribute to a reduction in trips by fossil fuelled vehicles and therefore air pollution.
- **Policy AT1 Pedestrian Movement, Permeability and Wayfinding:** This policy seeks to improve routes for pedestrians, which could contribute to a reduction in trips by fossil fuelled vehicles and therefore air pollution.
- **Strategic Policy S19 Pool of London:** requires that car parking areas are removed upon redevelopment, within this policy area.

5.5 In addition, Transport for London intends that its entire fleet of buses will be zero emission by 2037 at the latest[36], i.e. within the City of London Plan period.

With these safeguards in place, it is considered that adverse effects on the integrity of Epping Forest SAC, Lee Valley SPA and Ramsar Site, Richmond Park SAC and Wimbledon Common SAC due to air pollution will be avoided.

Direct runoff

5.6 The following policies within the Plan provide safeguards that would ensure direct runoff of pollutants would not occur at a scale that would affect downstream European sites:

- **Policy HL5 Contaminated land and water quality:** "Where development involves ground works or the creation of open spaces, developers will be expected to carry out a detailed site investigation to establish whether the site is contaminated and to determine the potential for pollution of the water environment or harm to human health and non-human receptors. Suitable mitigation must be identified to remediate any contaminated land and prevent potential adverse impacts of the development on human and non-human receptors, land or water quality."
- **Policy CR3 Sustainable drainage systems (SuDS):** "All development, transportation and public realm proposals must incorporate SuDS principles and be designed to minimise the volume and discharge rate of rainwater run-off into the combined drainage network in the City, ensuring that rainwater is managed as close as possible to the development." And "SuDS should be designed, where possible, to maximise contributions to water resource efficiency, water quality, biodiversity enhancement and the provision of multifunctional open spaces."
- **Strategic Policy S17 Thames Policy Area:** character of the riverside will be enhanced by "Ensuring that development does not have an adverse effect on the River Thames and Tidal Tributaries Site of Metropolitan Importance for Nature Conservation and seeking opportunities to create or enhance riverside habitats."

With these policy safeguards in place, it is considered that adverse effects on the integrity of Thames Estuary and Marshes SPA / Ramsar and the Outer Thames Estuary SPA due to direct runoff will be avoided.

Wastewater treatment

5.7 Policy IN1 Infrastructure provision and connection provides measures that will reduce the requirement for water treatment and discharge associated with the Plan: "water supply necessary for the operation of the intended use and during the construction period. Account should be taken of the need to conserve resources and deliver energy and water efficient buildings to minimise future demands." And "Separate surface and foul water drainage requirements within the proposed building or site, including provision of Sustainable Drainage Systems (SuDS), rainwater harvesting and grey-water recycling, minimising discharge to the combined sewer network."

5.8 The Thames Water Drainage and Wastewater Management Plan 2025-2050[37] identified that growth upgrades at treatment works are required to meet expected demand due to the population growth, 2.5 million between 2025-2050. Thames Water is required to meet this demand.

5.9 In addition, Thames Water's extensive sewer upgrading project, the Thames Tideway Tunnel, will also help to accommodate population growth across London, by tackling

[36] https://www.london.gov.uk/programmes-and-strategies/environment-and-climate-change/pollution-and-air-quality/cleaner-buses

[37] Thames Water Drainage and Wastewater Management Plan 2025-2050, https://www.thameswater.co.uk/about-us/regulation/drainage-and-wastewater-management/our-dwmp#summary

the problems caused by overflow from the city's Victorian system of sewers.

5.10 There are also established regulatory mechanisms over the treatment of waste water (regulated by the Environment Agency) that take into account environmental impacts including likely significant effects on European sites, which should provide safeguards to ensure no adverse effects on integrity arise.

5.11 In light of this mitigation, water quality has been screened out for the European Sites.

With these Local Plan policy and external safeguards in place, it is considered that adverse effects on the integrity of Thames Estuary and Marshes SPA and Ramsar site and the Outer Thames Estuary SPA due to water treatment will be avoided.

Water abstraction

5.12 As with wastewater treatment, policy IN1 will reduce demand for water.

5.13 As part of Thames Water's planning for water management in the region, a new water abstraction scheme is also proposed that will pump treated, recycled water upstream of the Teddington Weir back into the River Thames, to compensate for the additional water taken from the river to protect the environmental and wildlife present. This scheme will improve the existing water supplies resilience, particularly during years of drought.

5.14 There are also established regulatory mechanisms over the treatment of wastewater and drinking water abstraction that take into account environmental impacts, including likely significant effects on European sites, that should provide safeguards to ensure no adverse effects on integrity arise.

With these Local Plan policy and external safeguards in place, it is considered that adverse effects on the integrity of Lee Valley SPA and Ramsar site due to water abstraction will be avoided.

Chapter 6
Conclusions and next steps

6.1 HRA Screening found that there are likely significant effects on European sites associated with the Revised Proposed Submission Draft City Plan.

6.2 The HRA Screening identified potential likely significant effects in relation to the following impacts:

- Air pollution due to increases in commuting traffic on roads past Epping Forest SAC, Lee Valley SPA and Ramsar site, Richmond Park SAC and Wimbledon Common SAC;
- Direct pollution into the Thames, affecting Thames Estuary and Marshes SPA / Ramsar and the Outer Thames Estuary SPA;
- Wastewater treatment into the Thames, affecting Thames Estuary and Marshes SPA / Ramsar and the Outer Thames Estuary SPA; and
- Water abstraction from the Lee Valley SPA/Ramsar.

6.3 These impacts would arise as a result of the following policies:

- Strategic Policy S3: Housing (water quality/quantity only)
- Policy HS1: Location of New Housing (water quality/quantity only)
- Strategic Policy S4: Offices
- Policy CV4: Hotels
- Strategic Policy S5: Retail and active frontages
- Strategic Policy S1: Healthy and Inclusive City
- Policy HL6: Location and protection of social and community facilities
- Policy HL7: Public toilets (water quality/quantity only)
- Policy HL8: Sport and recreation
- Policy HS6: Student accommodation and hostels (water quality/quantity only)
- Policy HS7: Older persons housing (water quality/quantity only)
- Policy OF3: Temporary 'Meanwhile' Uses
- Policy RE4: Markets
- Policy CV5: Evening and Night-Time Economy

- Policy VT4: River Transport (water quality/quantity only)
- Strategic Policy S17: Thames Policy Area (water quality/quantity only)

6.4 Appropriate Assessment was therefore required to consider whether the above likely significant effects will, in light of mitigation and avoidance measures, result in adverse effects on integrity of the European sites.

6.5 The Appropriate Assessment concluded that mitigation set out in other Local Plan policies, along with regulatory safeguards, are sufficient to avoid adverse effects on the integrity of European sites.

6.6 Policies providing mitigation for air pollution are:

- Policy VT3: Vehicle Parking
- Policy VT2: Freight and Servicing
- Policy CV4: Hotels
- Strategic Policy S19: Pool of London

6.7 Policies providing mitigation for changes to water quality of quantity are:

- Policy HL5: Contaminated land and water quality
- Policy IN1: Infrastructure provision and connection
- Policy CR3: Sustainable drainage systems (SuDS)
- Strategic Policy S17: Thames Policy Area

Next Steps

6.8 HRA is an iterative process and as such is expected to be updated in light of newly available evidence and comments from key consultees. As part of consultation on the Revised Proposed Submission Draft City Plan, this HRA report will be subject to consultation with Natural England, as well as the Environment Agency, to confirm that the conclusions of the assessment are considered appropriate at this stage of plan-making.

LUC

December 2023

Appendix A

Attributes of European Sites

Site name	Qualifying features	Conservation Objectives	Current pressures or threats	Results of SSSI condition survey[38]	Non qualifying habitats and species upon which the qualifying habitats and/or species depend
Epping Forest SAC (1,630.74 ha)	Annex 1 Habitats (which are a primary reason for the selection of this site): Atlantic acidophilous beech forests with *Ilex* and sometimes also *Taxus* in the shrublayer (*Quercion robori-petraeae* or *Ilici-Fagenion*). Annex 1 Habitats (which are present as a qualifying feature but not a primary reason for the selection of this site): European dry heaths North Atlantic wet heaths with *Erica tetralix* (wet heathland with corss-leaved heath). Annex II species (that are a primary reason for the selection of this site): Stag beetle *Lucanus cervus*	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring[39]; ■ The extent and distribution of qualifying natural habitats and habitats of qualifying species ■ The structure and function (including typical species) of qualifying natural habitats	Threats and pressures[40] on this site include the following: ■ Air pollution: impact of atmospheric nitrogen deposition ■ Undergrazing ■ Public access / disturbance ■ Changes in species distributions ■ Inappropriate water levels ■ Water pollution ■ Invasive species ■ Disease ■ Invasive species Air Pollution: impact of atmospheric nitrogen deposition - Nitrogen deposition exceeds site-relevant critical loads for ecosystem protection. Some parts	Area favourable: 38.46% Area unfavourable but recovering: 3.85% Area unfavourable no change: 7.69% Not recorded: 50%	Stag beetles require decaying wood of broadleaved trees for larvae to feed, although not of a particular tree species. The supplementary advice on conserving and restoring site features[42] states that off-site trees in local gardens, parks and along the roadside may be important in helping to maintain the local stag beetle population if decaying timber is present and may help to 'connect' the SAC population with neighbouring colonies. The supplementary advice also states: The qualifying habitat comprises beech Fagus sylvatica forests with holly *Ilex aquifolium*, growing on acid soils, in a humid Atlantic climate. Sites of this habitat type often are, or were, managed as wood-pasture systems, in which pollarding of beech *Fagus* sylvatica and oak *Quercus* spp. was common. Wet heath usually occurs on acidic, nutrient-poor substrates, such as shallow peats or sandy soils with impeded drainage. European dry heaths typically occur on freely-draining, acidic to circumneutral soils with generally low nutrient content. Nearly all dry heath is seminatural, being

[38] Natural England Designated Site View
[39] Conservation Objectives: Epping Forest, Natural England, November 2018
[40] Site Improvement Plan: Epping Forest, Natural England, December 2016.
[42] European Site Conservation Objectives: Supplementary advice on conserving and restoring site features Epping Forest (SAC). Natural England, January 2019. Available at: http://publications.naturalengland.org.uk/publication/5908284745711616.

Site name	Qualifying features	Conservation Objectives	Current pressures or threats	Results of SSSI condition survey[38]	Non qualifying habitats and species upon which the qualifying habitats and/or species depend
		■ The structure and function of the habitats of qualifying species ■ The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely ■ The populations of qualifying species, and, ■ The distribution of qualifying species within the site.	of the site are assessed as in unfavourable condition for reasons linked to air pollution impacts. Undergrazing - The quality and diversity of the SAC features requires targeted management best achieved through grazing to: minimise scrub invasion; minimise robust grass domination, and maximise the species diversity of heathland plant communities. Public Access / Disturbance - Epping Forest is subject to high recreation pressure. Changes in species distributions - Beech tree health and recruitment may not be coping sufficiently with environmental conditions to sustain its presence and representation within the SAC feature. This may be linked to climate change as well as other factors such as air quality, recreation pressure and water availability. Inappropriate water levels - Wet heath is dependent on suitable ground water levels. There is a threat of prolonged drying out		derived from woodland through a long history of grazing and burning. Most dry heaths are managed as extensive grazing for livestock. Some plant or animal species (or related groups of such species) make a particularly important contribution to the necessary structure, function and/or quality of qualifying habitats. For wet heath, this includes: *Calluna vulgaris*, *Erica cinerea, E. tetralix, Salix repens, Ulex minor, Vaccinium spp. Carex panicea, C. pulicaris, Dactylorrhiza maculata, Eleocharis spp., Eriophorum angustifolium, Juncus acutiflorus, J. articulatus, Molinia caerulea, Anagallis tenella, Drosera spp., Galium saxatile, Genista anglica, Polygala serpyllifolia, Potentilla erecta, Succisa pratensis. Pedicularis sylvatica.* For dry heath, this includes: *Calluna vulgaris, Erica cinerea, E. tetralix, Ulex minor, Vaccinium spp Genista anglica, Agrostis spp., Carex spp., Danthonia decumbens, Deschampsia flexuosa, Festuca spp., Molinia caerulea, Nardus stricta, Galium saxatile, Hypochaeris radicata, Lotus corniculatus, Pedicularis sylvatica, Plantago lanceolata, Polygala spp. Potentilla erecta, Rumex acetosella, Succisa pratensis, Scilla verna, Serratula tinctoria, Teucrium scorodonia Thymus praecox, Viola riviniana,* There are many plants and animals which use or co-exist with non-native trees, but many rare and threatened woodland species are specialists adapted to one or a few native trees or shrub species (birches, willows and oaks, are examples of trees that host many specialist insect species). At this SAC, site-native species of tree and shrub include those typical of the H9120 type including Beech *Fagus sylvatica*, Oak

Site name	Qualifying features	Conservation Objectives	Current pressures or threats	Results of SSSI condition survey[38]	Non qualifying habitats and species upon which the qualifying habitats and/or species depend
			through climate change. Water pollution - Surface run-off of poor quality water from roads with elevated levels of pollutants, nutrients and salinity may be affecting wet heath, probably mostly around the edges. Invasive species - Heather beetle has locally impacted on some heathland areas. Grey squirrel is not currently known to be significantly affecting tree health or regeneration but this will need to be monitored. Disease - Tree diseases such as Phytopthora present a real threat to Beech. In addition to the above, the supplementary advice[41] identifies the following vulnerabilities: Adaptation and resilience of the feature – the vulnerability of Epping Forest SAC to climate change has been assessed by Natural England as being Medium taking into account the sensitivity, fragmentation, topography and		*Quercus robur* and *Quercus petraea*, Holly *Ilex aquifolium*, Bramble *Rubus fruticosus* agg. Honeysuckle *Lonicera periclymenum*, Hornbeam *Carpinus betulus*, Silver birch *Betula pendula*, Downy birch *Betula pubescens*, Yew *Taxus baccata*, Elder *Sambucus nigra*, Goat willow *Salix caprea* and Wild Cherry *Prunus avium*. In addition to this, the characteristic mosaics and transitions of ancient forests and wood-pasture-types are well-represented within the site and are necessary for the conservation of SAC features and site integrity. Key species of ground flora, epiphytic bryophytes, mosses, liverworts and lichens are also listed.

[41] European Site Conservation Objectives: Supplementary advice on conserving and restoring site features Epping Forest (SAC). Natural England, January 2019. Available at: http://publications.naturalengland.org.uk/publication/5908284745711616.

Site name	Qualifying features	Conservation Objectives	Current pressures or threats	Results of SSSI condition survey[38]	Non qualifying habitats and species upon which the qualifying habitats and/or species depend
			management of its habitats. Functional connectivity with wider landscape- The heathland resource is extensive in county terms but is fragmented, mainly by closed tree canopy habitat and roads. It is therefore vulnerable to encroachment, boundary effects, pollution, recreational impact and hydrological changes. Vegetation structure - Variations in the structure of the heathland vegetation (vegetation height, amount of canopy closure, and patch structure) is needed to maintain high niche diversity and hence high species richness of characteristic heathland plants and animals. There is currently low cover (<25%) of dwarf shrubs present for the feature and less than 15% of scrub and tree cover. Soils - the soils of the wet heath habitat are vulnerable to, and have been exposed to acidification, nutrient enrichment and pollution due to their fragmentation and proximity to roads and urban/residential development.		

Site name	Qualifying features	Conservation Objectives	Current pressures or threats	Results of SSSI condition survey[38]	Non qualifying habitats and species upon which the qualifying habitats and/or species depend
			Illumination - Epping Forest is fragmented by roads and largely surrounded by urban development and residential areas. Opportunities should be sought to minimise and reduce light pollution from existing development and any development plans or projects to ensure SAC features and significant biodiversity assets are safeguarded.		
Lee Valley SPA and Ramsar Site (447.87 ha)	***SPA:*** Annex 1 species (non – breeding): Great bittern *Botaurus stellaris* Annex 1 (migratory species, non - breeding): Northern shoveler *Anas clypeata* Gadwall *Anas strepera* Non Qualifying Species of Interest:	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring[43]; ■ The extent and distribution of the habitats of the qualifying features ■ The structure and function of the	Threats and pressures[44] on this site include the following: ■ Water pollution ■ Hydrological changes ■ Public access / disturbance ■ Inappropriate scrub control ■ Fisheries: Fish stocking ■ Invasive species ■ Inappropriate cutting / mowing ■ Air pollution: risk of	Area favourable: 94.4% Area unfavourable but recovering: 5.6%	The information below is drawn from the supplementary advice on conserving and restoring site features[47]. **Great bittern** ■ Standing open water and canals - bittern rely on the presence and continuity of open water habitat. Changes in water area, and associated marginal habitat, can adversely affect the suitability of supporting open water habitat. ■ Reedbeds. ■ Open terrain – bittern favour large areas of open terrain, largely free of obstructions, in and around its nesting, roosting and feeding areas. Often

[43] Conservation Objectives: Lee Valley, Natural England, February 2014
[44] Site Improvement Plan: Lee Valley, Natural England, December 2014
[47] European Site Conservation Objectives: Supplementary Advice on Conserving and Restoring Site Features Lee Valley Special Protection Area (SPA). Natural England, February, 2018.

Site name	Qualifying features	Conservation Objectives	Current pressures or threats	Results of SSSI condition survey[38]	Non qualifying habitats and species upon which the qualifying habitats and/or species depend
	Cormorant *Phalacrocorax carbo* Great Crested Grebe *Podiceps cristatus* Tufted Duck *Aythya fuligula* Pochard *Aythya ferina* Grey Heron *Ardea cinereal* ***Ramsar:*** The site supports the nationally scarce plant species whorled watermilfoil *Myriophyllum verticillatum* and the rare or vulnerable invertebrate *Micronecta minutissima* (a waterboatman). Over winter the area regularly supports: Gadwell, *Anas strepera* – 456 individuals, representing an average of 1.5% of the population Shoveler, *Anas clypeata* – 406 individuals, representing an average of 1% of the population	habitats of the qualifying features ■ The supporting processes on which the habitats of the qualifying features rely ■ The population of each of the qualifying features, and, ■ The distribution of the qualifying features within the site.	atmospheric nitrogen deposition Water Pollution - The vegetation and invertebrates provide food for the ducks, while fish provide food for the bitterns; and the habitat mosaic needs to vary from clear open water with abundant aquatic vegetation to moderately eutrophic conditions. Changes in water quality need to be managed to prevent loss of suitable habitat and food sources. Hydrological changes - Reservoir levels linked to operational requirements and all water bodies subject to natural fluctuations accounting for abstraction and climatic change. Public Access/Disturbance - Areas of the SPA are subject to a range of recreation pressures including watersports, angling and dog walking. This has the potential to affect SPA populations directly or indirectly. Inappropriate scrub control - The reedbed habitats, muddy fringes, and bankside all provide habitat as part of the mosaic for the SPA birds. Scrub control is necessary		there is a need to maintain an unobstructed line of sight within nesting, feeding or roosting habitat to detect approaching predators, or to ensure visibility of displaying behaviour. ■ Key prey species include eel, rudd, roach, frogs, toads and invertebrates. Within the SPA/Ramsar, the majority of bittern are found in the Turnford and Cheshunt Pits site while Amwell Quarry and Rye Meads also support the species. Walthamstow Reservoirs also occasionally supports bittern. **Gadwall** ■ Standing open water - gadwall favour gravel pits and reservoirs during the winter period where they feed on seeds, leaves and stems of water plants. ■ Preferred food plants – sweet-grass (*Glyceria fluitans*), creeping bent (*Arostis stolonifera*), stoneworts (*Chara*), pondweeds (*Potomageton, Ceratophyllum* spp., *Ruppia, Elodeo nuttallii*). Each of the SPA/Ramsar's component SSSIs support gadwall in numbers which are sufficient to qualify them as being of national importance. **Northern shoveler** ■ Standing open water - in winter, shoveler frequent shallow water areas on marshes, flooded pasture, reservoirs and lakes with plentiful, marginal reeds

Site name	Qualifying features	Conservation Objectives	Current pressures or threats	Results of SSSI condition survey[38]	Non qualifying habitats and species upon which the qualifying habitats and/or species depend
			to ensure these habitats are maintained. Fisheries: Fish stocking - Fish population and species composition needs to be appropriate to ensure suitable habitats including food resource and water quality are maintained for SPA bird species. Invasive species - Azolla and/or invasive aquatic blanket weeds will adversely affect aquatic habitat (food sources). Inappropriate cutting/mowing - The reedbed requires rotational management for bittern. Air Pollution: risk of atmospheric nitrogen deposition - Nitrogen deposition exceeds site relevant critical loads. The Information Sheet on Ramsar Wetlands[45] also notes the whole site supports high levels of visitor pressure; principally for purposes of angling, walking, cycling and birdwatching; with boating on the		or emergent vegetation and are found throughout. ■ Preferred food plants – *Scirpus, Eleocharis, Carex, Potaogeton, Glyceria.* Shoveler also feed on zooplankton (e.g. *Hydrobia*, crustaceans, caddisflies, *Diptera*, beetles) in the shallow margins of waterbodies. Preferred food plants are linked with early successional stages of waterbodies, therefore succession, particularly tree cover, can lead to the loss of suitable foraging habitat. The British Trust for Ornithology[48] records the site's qualifying bird species' diets as: ■ Bittern: mostly fish, amphibians, insects but wide variety; ■ Shoveler: omnivorous (incl. insects, crustaceans, molluscs, seeds); and ■ Gadwall: leaves and shoots. The Information Sheet on Ramsar Wetlands[49] also notes the ecological features of the site include open water, with associated wetland habitats including reedbeds, fen grassland and woodland which support a number of wetland plant and animal species including internationally important numbers of wintering wildfowl.

[45] Information Sheet on Ramsar Wetlands (RIS) UK11034: Lee Valley. JNCC, September 2000. Available at: https://jncc.gov.uk/our-work/ramsar-sites/.
[48] https://www.bto.org/understanding-birds/birdfacts
[49] Information Sheet on Ramsar Wetlands (RIS) UK11034: Lee Valley. JNCC, September 2000. Available at: https://jncc.gov.uk/our-work/ramsar-sites/.

Site name	Qualifying features	Conservation Objectives	Current pressures or threats	Results of SSSI condition survey[38]	Non qualifying habitats and species upon which the qualifying habitats and/or species depend
			adjacent canal. These activities are mostly well regulated and at current levels are not considered to threaten the interest of the Ramsar site (although they may reduce the potential for enhancing the interest). In addition to the above, the supplementary advice[46] identifies the following vulnerabilities: Conservation measures - Active and ongoing conservation management is often needed to protect, maintain or restore Botaurus stellaris Great bittern (non-breeding) at this site. Vegetation characteristics - Many bird species will have specific requirements that conservation measures will aim to maintain, for others such requirements will be less clear. Activities that may directly or indirectly affect the vegetation of supporting habitats and modify these characteristics may adversely affect the feature. Connectivity with supporting habitats - Bitterns clearly move		

[46] European Site Conservation Objectives: Supplementary Advice on Conserving and Restoring Site Features Lee Valley Special Protection Area (SPA). Natural England, February, 2018. Available at: http://publications.naturalengland.org.uk/publication/5670650798669824.

Site name	Qualifying features	Conservation Objectives	Current pressures or threats	Results of SSSI condition survey[38]	Non qualifying habitats and species upon which the qualifying habitats and/or species depend
			between sites within the Lee Valley and to do this they will need to move safely to and from supporting habitat between individual waterbodies and above/across land outside the SPA. Also, the ability of Northern Shoveler to safely and successfully move to and from feeding and roosting areas is critical to their adult fitness and survival. Water depth - As the birds will rely on detecting their prey within the water to hunt, the depth of water at critical times of year may be paramount for successful feeding and therefore their fitness and survival. Population abundance – the population of Northern Shoveler within Lee Valley SPA has shown a slight decrease since Classification. The key SPA sites at Amwell and Turnford & Cheshunt Pits experienced a population decline during the 1999/00 – 2008/09 period, along with the functionally linked non-SPA Holyfield gravel pits. The SPA Walthamstow reservoirs and non-SPA Chingford reservoirs		

Site name	Qualifying features	Conservation Objectives	Current pressures or threats	Results of SSSI condition survey[38]	Non qualifying habitats and species upon which the qualifying habitats and/or species depend
			show population trends that appear to be related to water levels and available food resource. Food availability within supporting habitat - the availability of an abundant food supply is critically important for successful breeding, adult fitness and survival and the overall sustainability of the population. As a result, inappropriate management and direct or indirect impacts which may affect the distribution, abundance and availability of prey may adversely affect the population.		
Richmond Park SAC (846.68ha)	Richmond Park has a large number of ancient trees with decaying timber. It is at the heart of the south London centre of distribution for stag beetle *Lucanus cervus*, and is a Site of national importance for the conservation of the fauna of invertebrates associated with the decaying timber of ancient	Ensure that the integrity of the Site is maintained or restored as appropriate, and ensure that the Site contributes to achieving the Favourable Conservation Status of Stag beetle, by maintaining or restoring[50]:	No current issues affecting the Natura 2000 feature have been identified. Despite this, the Richmond Park Management Plan should continue to be periodically reviewed to ensure the continuing availability of decaying wood habitat[51].	Area Favourable: 60% Area Unfavourable – Recovering: 40%	Stag beetle *Lucanus cervus* Supporting habitats ■ Decaying-wood habitat: Maintain an abundance and constant supply of ancient trees, standing dead trees, fallen trees, stumps and roots in a state of decay. In urban areas ensure larger native trees and man-made timber structures persist as a larval resource.

[50] Conservation Objectives: Richmond Park SAC, Natural England, November 2018
[51] Site Improvement Plan: Richmond Park SAC, Natural England, December 2014

Site name	Qualifying features	Conservation Objectives	Current pressures or threats	Results of SSSI condition survey[38]	Non qualifying habitats and species upon which the qualifying habitats and/or species depend
	trees. Annex II species that are a primary reason for selection of this Site: Stag beetle *Lucanus cervus*	■ The extent and distribution of the habitats of qualifying species. ■ The structure and function of the habitats of qualifying species. ■ The supporting processes on which the habitats of qualifying species rely. ■ The populations of qualifying species, and, ■ The distribution of qualifying species within the Site.			■ Woodland habitat structure: Maintain a well-structured broadleaved woodland habitat, with sheltered, sunlit glades and rides containing stumps and other suitable decaying wood. Supporting Processes ■ Natural processes: Ensure the continuity of timber decay and nutrient recycling processes, in particular the continued provision of plentiful decaying stumps and roots. ■ Conservation measures: Maintain the management measures (either within and/or outside the Site boundary as appropriate) which are necessary to maintain or restore the structure, functions and supporting processes associated with the stag beetle feature and/or its supporting habitats.
Wimbledon Common SAC (348.31ha)	Wimbledon Common has a large number of old trees and much fallen decaying timber. It is at the heart of the south London centre of distribution for stag beetle *Lucanus cervus*. The Site supports a number of other scarce invertebrate species associated with decaying timber. Annex I habitats present as a	Ensure that the integrity of the Site is maintained or restored as appropriate, and ensure that the Site contributes to achieving the Favourable Conservation Status of its	The Site is located in an urban area and therefore experiences air pollution and heavy recreational pressure. According to Natural England's Site Improvement Plans, measures should be implemented by Natural England to establish a Site Nitrogen Action Plan. Furthermore, Natural England and Wimbledon and Putney Common	Area Unfavourable – Recovering: 40% Area Unfavourable – No change: 60%	For Stag beetle see Richmond Park Special Area of Conservation above. H4030 European Dry Heaths Supporting habitats Vegetation Composition ■ Bracken cover: Maintain or restore a cover of dense bracken which is low, typically at <5%, across the H4030 feature.

Site name	Qualifying features	Conservation Objectives	Current pressures or threats	Results of SSSI condition survey[38]	Non qualifying habitats and species upon which the qualifying habitats and/or species depend
	qualifying feature, but not a primary reason for selection of this Site ■ Northern Atlantic wet heaths with *Erica tetralix* ■ European dry heaths Annex II species that are a primary reason for selection of this Site: ■ Stag beetle *Lucanus cervus*	Qualifying Features, by maintaining or restoring[52]: ■ The extent and distribution of qualifying natural habitats (Northern Atlantic wet heaths with Erica tetralix & European dry heaths) and habitats of qualifying species (Stag beetle). ■ The structure and function (including typical species) of qualifying natural habitats. ■ The structure and function of the habitats of qualifying species. ■ The supporting processes on which qualifying natural habitats and the habitats	Conservators should implement measures to reduce visitor impact. Issues associated with habitat fragmentation and invasive species have also been identified. The Species Recovery Programme should address this, while an invasives response plan should be developed[53].		■ Vegetation community composition: Ensure the component vegetation communities of the H4030 feature are referable to and characterised by the following National Vegetation Classification type (s): ■ H1 Calluna vulgaris – *Festuca ovina* Heathland; ■ H2 Calluna vulgaris – Ulex minor heath (and as mosaics with acid grassland vegetation). ■ Vegetation community transitions: Maintain or restore any areas of transition between the H4030 feature and other heathland associated habitats, such as humid heath, mires, acid grassland, scrub and woodland. ■ Key structural, influential and distinctive species: Maintain or restore the abundance of the species listed below to enable each of them to be a viable component of the Annex 1 habitat: Heather *Calluna vulgaris*, Bell heather *Erica cinerea*, dwarf gorse *Ulex minor*, pill sedge *Carex pilulifera*, heath bedstraw *Galium saxatile*, petty whin *Genista anglica*, *Hypochaeris radicata, tormentil Potentilla erecta,* sheep's sorrel *Rumex acetosella, Mosses*

[52] Conservation Objectives: Wimbledon Common SAC, Natural England, November 2018
[53] Site Improvement Plan: Wimbledon Common SAC, Natural England, November 2014

Site name	Qualifying features	Conservation Objectives	Current pressures or threats	Results of SSSI condition survey[38]	Non qualifying habitats and species upon which the qualifying habitats and/or species depend
		of qualifying species rely. ■ The populations of qualifying species, and ■ The distribution of qualifying species within the Site.			*Hypnum jutlandicum, Dicranum scoparium, Polytrichum juniperinum*. Vegetation Structure ■ Cover of gorse: Maintain or restore a cover of common gorse Ulex europaeus at <1-5% and a combined cover of U.europaeus and dwarf gorse U.minor at <20%, across the H4030 feature. ■ Tree and scrub cover: Maintain or restore the open character of the H4030 feature, with a typically scattered and low cover of trees and scrub <10% cover (excluding common gorse). ■ Heather age structure: Maintain or restore a diverse age structure amongst the ericacerous shrubs typically found as part of the H4030 feature. ■ Cover of dwarf shrubs: Maintain or restore an overall cover of dwarf shrub species which is typically between 75- 90% of the H4030 feature. Extent and Distribution ■ Extent of the feature within the Site: Restore the combined total extent of the H4030 and H4010 feature to 48.6 hectares, including its component habitat types and transitions to adjacent habitats. ■ Spatial distribution within the Site: Maintain or restore the distribution and configuration of the

Site name	Qualifying features	Conservation Objectives	Current pressures or threats	Results of SSSI condition survey[38]	Non qualifying habitats and species upon which the qualifying habitats and/or species depend
					H4030 feature, including where applicable its component vegetation types, across the Site. Structure and Function ■ Vegetation: undesirable species. Maintain or restore the frequency/cover of the following undesirable species to within acceptable levels and prevent changes to surface condition, soils, nutrient levels or hydrology which may encourage their spread: Acaena spp., Rhododendron *ponticum, Gaultheria shallon, Fallopia japonica, Cirsium arvense, Digitalis purpurea,Epilobium spp. (excl. E. palustre), Ranunculus repens, Senecio jacobaea, Rumex obtusifolius, Urtica dioica*. ■ Functional connectivity with the wider landscape: Maintain or restore the overall extent, quality and function of any supporting features within the local landscape which provide a critical functional connection with the Site. ■ Adaptation and resilience: Maintain or restore the H4030 feature's ability, and that of its supporting processes, to adapt or evolve to wider environmental change, either within or external to the Site. ■ Soils, substrate and nutrient cycling: Maintain or restore the properties of the underlying soil types, including structure, bulk density, total carbon, pH,

Site name	Qualifying features	Conservation Objectives	Current pressures or threats	Results of SSSI condition survey[38]	Non qualifying habitats and species upon which the qualifying habitats and/or species depend
					soil nutrient status and fungal/bacterial ratio, to within typical values for the H4030 feature. Supporting Processes ■ Conservation measures: Maintain or restore the management measures (either within and/or outside the Site boundary as appropriate) which are necessary to maintain or restore the structure, functions and supporting processes associated with the H4030 feature. ■ Air quality: Restore the concentrations and deposition of air pollutants to at or below the Site-relevant Critical Load or Level values given for this feature of the Site on the Air Pollution Information System. H4010 Northern Atlantic Wet Heaths with *Erica tetralix* Extent and Distribution ■ Extent of the feature within the Site: Restore the total extent of the H4010 and H4030 features to 48.6 hectares. ■ Spatial distribution of the feature within the Site: Maintain the distribution and configuration of the H4010 feature, including where applicable its component vegetation types, across the Site. Structure and Function (including its typical species)

Site name	Qualifying features	Conservation Objectives	Current pressures or threats	Results of SSSI condition survey[38]	Non qualifying habitats and species upon which the qualifying habitats and/or species depend
					■ Vegetation community transitions: Maintain or restore any areas of transition between this and communities which form other heathland-associated habitats, such as dry and humid heaths, mires, acid grasslands, scrub and woodland. ■ Vegetation community composition: Ensure the component vegetation communities of the H4010 feature are referable to and characterised by the following National Vegetation Classification type (s): ■ M16 *Erica tetralix* – Sphagnum compactum heathland ■ Mosaics with M25 *Molinia caerulea – Potentilla erecta* mire. ■ Vegetation structure: cover of dwarf shrubs. Maintain an overall cover of dwarf shrub species which is typically between 75-90%. ■ Vegetation structure: heather age structure. Maintain a diverse age structure amongst the ericaceous shrubs typically found on the Site. ■ Vegetation structure: cover of gorse: Maintain cover of common gorse at <10%. ■ Vegetation structure: tree and shrub cover. Maintain the open character of the H4010 feature,

Site name	Qualifying features	Conservation Objectives	Current pressures or threats	Results of SSSI condition survey[38]	Non qualifying habitats and species upon which the qualifying habitats and/or species depend
					with a typically scattered and low cover of trees and scrub (<10% cover). ■ Vegetation composition: bracken cover. Restore a cover of dense bracken which is low, typically at <5%. ■ Key structural, influential and Site distinctive species: Restore the abundance of the species listed below to enable each of them to be a viable component of the H4010 Annex 1 habitat: *Calluna vulgaris*, *Erica tetralix*, *Myrica gale, Salix repens, Ulex minor, Eleocharis spp., Eriophorum angustifolium, Molinia caerulea, Trichophorum cespitosum, Anagallis tenella, Drosera spp., Narthecium ossifragum*. ■ Vegetation: undesirable species. Restore the frequency/cover of the following undesirable species to within acceptable levels and prevent changes in surface condition, soils, nutrient levels or hydrology which may encourage their spread: Acaena spp., Rhododendron *ponticum, Gaultheria shallon*, *Fallopia japonica*, Cirsium arvense, *Digitalis purpurea, Epilobium spp. (excl. E. palustre*), *Ranunculus repens, Senecio jacobaea, Rumex obtusifolius, Urtica dioica*. ■ Functional connectivity with the wider landscape: Maintain the overall extent, quality and function of

Site name	Qualifying features	Conservation Objectives	Current pressures or threats	Results of SSSI condition survey[38]	Non qualifying habitats and species upon which the qualifying habitats and/or species depend
					any supporting features within the local landscape which provide a critical functional connection with the Site. ■ Adaptation and resilience: Maintain or restore the H4010 feature's ability, and that of its supporting processes, to adapt or evolve to wider environmental change, either within or external to the Site. Supporting Processes ■ Conservation measures: Maintain the management measures (either within and/or outside the Site boundary as appropriate) which are necessary to maintain or restore the structure, functions and supporting processes associated with the H4010 feature. ■ Soils, substrate and nutrient cycling: Maintain the properties of the underlying soil types, including structure, bulk density, total carbon, pH, soil nutrient status and fungal:bacterial ratio, at within typical values for the H4010 habitat. ■ Air quality: Restore the concentrations and deposition of air pollutants to at or below the Site-relevant Critical Load or Level values given for the H4010 feature of the Site on the Air Pollution Information System.

Site name	Qualifying features	Conservation Objectives	Current pressures or threats	Results of SSSI condition survey[38]	Non qualifying habitats and species upon which the qualifying habitats and/or species depend
					■ Hydrology: At a Site, unit and/or catchment level as necessary, maintain or restore the natural hydrological regime to provide the conditions necessary to sustain the H4010 feature within the Site.

Appendix B
Screening Assessment

Table B.1: HRA Screening of the Revised Proposed Submission Draft City Plan

Policy	Likely activities (operation) to result as a consequence of the proposal	Potential effects if proposal implemented	is the policy likely to have significant effects and therefore need to be scoped into the Appropriate Assessment?
Health, Inclusion and Safety			
Strategic Policy S1: Healthy and Inclusive City	Social, recreation and educational infrastructure e.g. schools and heath facilities	Air pollution Changes in water quality / quantity	Yes. This policy supports development for health and educational facilities and could make a small scale contribution to air pollution and water quality and quantity effects. Development in the City must be car free, but its facilities could attract trips from elsewhere.
Policy HL1: Inclusive buildings and spaces	None, this policy provides design requirements for new development in respect of accessibility for all and will not itself lead to development.	None	No
Policy HL2: Air quality	None, this policy seeks to avoid adverse impacts on air quality from new development but will not itself lead to development.	None	No
Policy HL3: Noise	None, this policy seeks to avoid noise impacts from new development but will not itself lead to development.	None	No
Policy HL5: Contaminated land and water quality	None, this policy seeks to avoid adverse impacts of development on land or water quality and will not itself lead to development.	None	No. However, this policy states that: “Where development involves ground works or the creation of open spaces, developers will be expected to carry out a detailed site investigation to establish whether the site is contaminated and to determine the potential for pollution of the water environment or harm to human health and non-human receptors. Suitable mitigation must be identified to remediate any contaminated land and prevent potential adverse impacts of the development on human and non-human receptors, land or water quality.” This will contribute to mitigation for water quality impacts.

Policy	Likely activities (operation) to result as a consequence of the proposal	Potential effects if proposal implemented	is the policy likely to have significant effects and therefore need to be scoped into the Appropriate Assessment?
Policy HL6: Location and protection of social and community facilities	Social and community infrastructure	Air pollution Changes in water quality / quantity	Yes. This policy supports development for social and community facilities and could make a small scale contribution to air pollution and water quality and quantity effects. Development in the City must be car free, but its facilities could attract trips from elsewhere.
Policy HL7: Public toilets	Provision of public toilets	Changes in water quality / quantity	Yes. This policy supports development for public toilets and could make a small scale contribution to water quality and quantity effects.
Policy HL8: Sport and recreation	Leisure development	Air pollution Changes in water quality / quantity	Yes. This policy permits sport and recreation facilities and therefore, could make a small scale contribution to air pollution and water quality and quantity effects. Development in the City must be car free, but its facilities could attract trips from elsewhere.
Policy HL9: Play areas and facilities	None, this policy promotes new play facilities but will not result in new buildings or water demand/treatment.	None	No
Policy HL10: Health Impact Assessment (HIA)	None, this policy sets requirements for new major development to undertake a rapid Health Impact Assessment and submit a full HIA for developments subject to an Environmental Impact Assessment or where the development could have health impacts and will not itself result in development.	None	No
Strategic Policy S2: Safe and Secure City	None, this policy provides design requirements for new development in respect of security and safety and will not itself lead to development.	None	No
Policy SA1: Publicly accessible locations	None, this policy provides design requirements for new major development to address the issue of publicly accessible locations and will not itself lead to development.	None	No

Policy	Likely activities (operation) to result as a consequence of the proposal	Potential effects if proposal implemented	is the policy likely to have significant effects and therefore need to be scoped into the Appropriate Assessment?
Policy SA2: Dispersal Routes	None, this policy provides design requirements for new major and night-time use development in respect of security and safety and will not itself lead to development.	None	No
Policy SA3: Designing in Security	None, this policy provides design requirements for new development in respect of security and safety, and requires measures to be sympathetic to surrounding buildings, the public realm and any heritage assets, and must be of a high-quality design taking into account 'secured by design' principles. It will not itself lead to development.	None	No
Housing			
Strategic Policy S3: Housing	Residential development	Changes in water quality / quantity	Yes. The policy seeks to protect existing housing and provide additional housing in or near identified residential areas (1,706 residential units between 2025/26 and 2039/40). This will contribute to water quality and quantity effects. Residential development will be car free; therefore air pollution is not associated with this policy.
Policy HS1: Location of New Housing	Residential development	Changes in water quality / quantity	Yes. This policy defines where the new residential development quantum defined in Policy S3 will be located. Residential development will be car free; therefore air pollution is not associated with this policy.
Policy HS2: Loss of housing	None, this policy sets out the circumstances in which existing housing will be protected and will not itself lead to new development.	None	No
Policy HS3: Residential environment	None, this policy sets out criteria to ensure that the amenity of existing residents will be protected. As such, it will not itself lead to new development.	None	No

Policy	Likely activities (operation) to result as a consequence of the proposal	Potential effects if proposal implemented	is the policy likely to have significant effects and therefore need to be scoped into the Appropriate Assessment?
Policy HS4: Housing quality standards	None, this policy sets of criteria to ensure housing is of high-quality design and facilitates the health and wellbeing of occupants. As such, it will not itself lead to new development.	None	No
Policy HS5: Short term residential letting	None, this policy sets out the circumstances in which short-term residential letting will and will not be permitted. As such, it will not itself lead to new development.	None	No
Policy HS6: Student accommodation and hostels	Student accommodation	Changes in water quality / quantity	Yes. The policy supports the development of student accommodation, which would make a small scale contribution to water quality and quantity effects. Residential development will be car free; therefore air pollution is not associated with this policy.
Policy HS7: Older persons housing	Residential development	Changes in water quality / quantity	Yes. The policy aims to deliver 86 net additional dwellings for older persons, which would make a small scale contribution to water quality and quantity effects. Residential development will be car free; therefore air pollution is not associated with this policy.
Policy HS8: Self and custom housebuilding	None, this policy supports self and custom built homes in large residential schemes but will not itself result in development.	None	No
Offices			
Strategic Policy S4: Offices	Employment development	Air pollution Changes in water quality / quantity	Yes. The policy seeks to protect existing offices and provide additional offices in the City. The scale of office development provided for is significant (minimum of 1.2 million m^2 during 2021-2040), and would contribute to effects relating to air pollution and changes in water quantity / quality. Development in the City must be car free, but employment development could attract trips from elsewhere.
Policy OF1: Office Development	None, this policy provides design requirements for new office development in respect of flexibility to adaption, prioritising	None	No

Policy	Likely activities (operation) to result as a consequence of the proposal	Potential effects if proposal implemented	is the policy likely to have significant effects and therefore need to be scoped into the Appropriate Assessment?
	retrofitting of existing buildings and provision for micro, small and medium sized enterprises, and will not itself lead to development.		
Policy OF2: Protection of Existing Office Floorspace	None, this policy sets out circumstances in which loss of office accommodation would be inappropriate and routes any loss of in office space should follow and will not itself lead to development.	None	No
Policy OF3: Temporary 'Meanwhile' Uses	Temporary use of vacant commercial, business and service buildings or sites ('meanwhile' uses)	Air pollution Changes in water quality / quantity	Yes. The policy sets out circumstances in which alternative, 'meanwhile' uses for vacant commercial, business and service buildings and sites would be encouraged. This would make a small scale contribution to air pollution and water quality and quantity effects. Development in the City must be car free, but 'meanwhile uses' could attract trips from elsewhere.
Retail			
Strategic Policy S5: Retail and active frontages	Retail development	Air pollution Changes in water quality / quantity	Yes. The policy seeks to provide additional retail, leisure and entertainment development in the City. This would contribute to air pollution and make a small scale contribution to water quality and quantity effects. Development in the City must be car free, but retail development could attract trips from elsewhere.
Policy RE1: Principal Shopping Centres	None, this policy states how the development of the Principal Shopping Centres will be promoted but will not itself lead to development.	None	No
Policy RE2: Active Frontages	None, this policy is mostly concerned with promoting active frontages but will itself not result in development.	None	No
Policy RE3: Specialist Retail Uses and clusters	None, this policy is mostly concerned with preserving existing specialist retail uses and premises that are	None	No

Policy	Likely activities (operation) to result as a consequence of the proposal	Potential effects if proposal implemented	is the policy likely to have significant effects and therefore need to be scoped into the Appropriate Assessment?
	historically and culturally significant and contribute to the vibrancy of the City and will not itself lead to development.		
Policy RE4: Markets	Retail development	Air pollution Changes in water quality / quantity	The policy sets out circumstances in which markets and temporary retail pop-ups would be permitted. This would make a small scale contribution to air pollution water quality and quantity effects. Development in the City must be car free, but retail development could attract trips from elsewhere.
Culture and Visitors			
Strategic Policy S6: Culture and Visitors	None; this policy defines the mix of uses appropriate to the City of London to attract visitors but the development itself (e.g. hotels) is defined by other policies.	None	No
Policy CV1: Protection of Existing Visitor, Arts and Cultural Facilities	None, this policy sets out the circumstances in which loss of existing arts and cultural facilities will be acceptable and will not itself lead to development.	None	No
Policy CV2: Provision of Arts, Culture and Leisure Facilities	None; this policy requires major developments to incorporate arts and culture provisions but will not itself result in new development.	None	No
Policy CV3: Provision of Visitor Facilities	None; this policy defines the provision of small scale facilities within the public realm, but would not result in buildings or alter water demand/treatment.	None	No
Policy CV4: Hotels	Hotels and visitor infrastructure development	Air pollution Changes in water quantity / quality	The policy sets out circumstances in which hotel development would be permitted. This would contribute to air pollution and water quality and quantity effects. Development in the City must be car free, but hotels could attract trips from elsewhere. This policy states that hotels must be in suitable locations with good access to public transport, which will help to reduce trips and therefore air pollution associated with this policy.

Policy	Likely activities (operation) to result as a consequence of the proposal	Potential effects if proposal implemented	is the policy likely to have significant effects and therefore need to be scoped into the Appropriate Assessment?
Policy CV5: Evening and Night-Time Economy	Evening and night-time entertainment	Air pollution Changes in water quantity / quality	The policy sets out circumstances in which evening and night-time use development would be permitted. This would make a small scale contribution to air pollution water quality and quantity effects. Development in the City must be car free, but entertainment development could attract trips from elsewhere.
Policy CV6: Public Art	None; this policy defines the provision of art e.g. within the public realm, but would not result in buildings or alter water demand/treatment.	None	No
Infrastructure			
Strategic Policy S7: Infrastructure and Utilities	None, this policy sets out how development should provide infrastructure and support the transition towards a zero carbon and climate resilient City and will not itself lead to development.	None	No
Policy IN1: Infrastructure provision and connection	None, this policy sets out how development should provide infrastructure, including the requirements to deliver energy and water efficient buildings and provide Sustainable Drainage Systems (SuDS), rainwater harvesting and grey-water recycling but will not itself lead to development.	None	No This policy states that infrastructure must be planned for as follows: “water supply necessary for the operation of the intended use and during the construction period. Account should be taken of the need to conserve resources and deliver energy and water efficient buildings to minimise future demands.” And “Separate surface and foul water drainage requirements within the proposed building or site, including provision of Sustainable Drainage Systems (SuDS), rainwater harvesting and grey-water recycling, minimising discharge to the combined sewer network.” This would contribute to mitigation for water quality / quantity effects.
Policy IN2: Infrastructure Capacity	None, this policy sets out how development should provide infrastructure and will not itself lead to development.	None	No

Policy	Likely activities (operation) to result as a consequence of the proposal	Potential effects if proposal implemented	is the policy likely to have significant effects and therefore need to be scoped into the Appropriate Assessment?
Policy IN3: Pipe Subways	None, this policy sets out how development should provide infrastructure and will not itself lead to development.	None	No
Design			
Strategic Policy S8: Design	None, this policy sets out design requirements for development, including addressing climate change, sustainable design, limiting light pollution and providing green infrastructure but will not itself lead to development.	None	No
Policy DE1: Sustainable Design	None, this policy sets out requirements for development regarding sustainable design, including energy efficiency, circular economy, limiting pollution and water use but will not itself lead to development.	None	No
Policy DE2: Design Quality	None, this policy sets out design requirements for new development, including conserving the built environment, high quality landscaping that enhances biodiversity, sustainable design and active travel and will not itself lead to development.	None	No
Policy DE3: Public Realm	None, this policy sets out design requirements for the public realm, including conserving the built environment, creation of new spaces, providing green corridors and incorporating rainwater management, but will not itself lead to development.	None	No
Policy DE5: Terraces and Elevated Public Spaces	None, this policy sets out design requirements for roof terraces and elevated public spaces, including requirements for tall buildings, major developments, retail and leisure facilities to create attractive places and provided accessible elevated spaces. The policy will itself not result in development.	None	No

Policy	Likely activities (operation) to result as a consequence of the proposal	Potential effects if proposal implemented	is the policy likely to have significant effects and therefore need to be scoped into the Appropriate Assessment?
Policy DE6: Shopfronts	None, this policy sets out design requirements for shopfronts, including maintaining the built character of the City and preventing light spillage. The policy will itself not result in development.	None	No
Policy DE7: Advertisements	None, this policy sets out design requirements for advertisements, including maintaining the character of the City, and will not itself lead to development.	None	No
Policy DE8: Daylight and sunlight	None, this policy sets out design requirements for developments with regards to daylight and sunlight and will itself not result in development.	None	No
Policy DE9: Lighting	None, this policy sets out design requirements for developments with regards to lighting, including limiting internal and external lighting impacts on heritage assets and biodiversity and will not itself result in development.	None	No
Transport			
Strategic Policy S9: Transport and Servicing	None; this policy seeks to reduce travel by car and increase travel by public transport. This policy states that there will be no additional on-street car or motorcycle parking, which is the reason that there will be no significant increase in traffic or air pollution arising from the Plan.	None	No
Policy VT1: The impacts of development on transport	Traffic management and highway security measures	Air pollution Changes in water quantity / quality	The policy allows for traffic management and highway security measures, for example restricting access and traffic calming, which could alter the flow of vehicles on roads in the City.
Policy VT2: Freight and Servicing	None, this policy sets standards with regard to freight and servicing, including seeking to reduce congestion, on-site servicing, providing electric vehicle fast charging points,	None	No This policy requires that servicing areas are equipped with electric vehicle fast charging points. It also states that " Developers should

Policy	Likely activities (operation) to result as a consequence of the proposal	Potential effects if proposal implemented	is the policy likely to have significant effects and therefore need to be scoped into the Appropriate Assessment?
	utilising river and rail freight travel but itself will not result in development.		minimise congestion and emissions caused by servicing and deliveries through ensuring, last mile deliveries are made by foot, cycle or zero emission vehicle, and should seek opportunities to support deliveries to the City by river and rail freight. Developers will be encouraged to identify opportunities for last mile logistic hubs where appropriate." This will reduce trips to/from the City and therefore air pollution.
Policy VT3: Vehicle Parking	None, this policy seeks to restrict car parking, provide charging facilities for electric vehicles and provide for taxi ranks at key locations but itself will not result in development.	None	No This policy states that "Development in the City should be car-free except for designated Blue Badge spaces. Where other car parking (including motorcycle parking) is exceptionally provided it must not exceed London Plan standards." In addition, no new public car parks will be permitted and underutilised public car parks will be prioritised for alternative uses. All off street car parking must have electric vehicle charging points. These will contribute to mitigation for air pollution impacts.
Policy VT4: River Transport	River Transport	Changes in water quality	Yes. This policy seeks to safeguard and enhance infrastructure for river transport and encourage use of the River Thames for movement of construction materials and waste. This could contribute to impacts relating to water quality.
Policy VT5: Aviation Landing Facilities	None; this policy says that helipads will only be permit for emergency / security use.	None	No
Strategic Policy S10: Active Travel and Healthy Streets	None; this policy sets out principles for active travel and healthy streets.	None	No This policy states that the Council will put the needs of people walking and wheeling first when designing and managing streets. This will contribute to a reduction in trips by fossil fuelled vehicles and therefore air pollution.

Policy	Likely activities (operation) to result as a consequence of the proposal	Potential effects if proposal implemented	is the policy likely to have significant effects and therefore need to be scoped into the Appropriate Assessment?
Policy AT1: Pedestrian Movement, Permeability and Wayfinding	None, this policy sets requirements for developers to facilitate pedestrian movement and enhance permeability.	None	No This policy seeks to improve routes for pedestrians, which could contribute to a reduction in trips by fossil fuelled vehicles and therefore air pollution.
Policy AT2: Active Travel including Cycling	None, this policy requires development to promote and encourage active travel.	None	No
Policy AT3: Cycle Parking	None, this policy makes provision for cycling infrastructure.	None	No
Heritage and Tall buildings			
Strategic Policy S11: Historic Environment	None, this policy seeks to protect, celebrate and manage the City's heritage assets and their setting and will not itself lead to development.	None	No
Policy HE1: Managing Change to the Historic Environment	None, this policy requires developments that affect heritage assets or their settings to be supported by a Statement of Heritage Significance and a Heritage Impact Assessment. The policy also sets out criteria when development may impact a heritage asset but will not itself lead to development.	None	No
Policy HE2: Ancient Monuments and Archaeology	None, this The policy seeks to conserve and enhance the City's archaeology and ancient monuments and will not itself lead to development.	None	No
Policy HE3: Setting of the Tower of London World Heritage Site	None, this policy seeks to conserve and enhance the Tower of London World Heritage Site and its setting and development proposals in the vicinity of the Tower of London World Heritage Site are encouraged to enhance pedestrian and cycle routes. However, this policy itself will not result in development.	None	No

Policy	Likely activities (operation) to result as a consequence of the proposal	Potential effects if proposal implemented	is the policy likely to have significant effects and therefore need to be scoped into the Appropriate Assessment?
Strategic Policy S12: Tall Buildings	None, this policy provides design requirements for the developments of tall buildings in respect of the City's character and heritage, environment impact and with regard to assisting in the dispersal of air pollutants. The policy will not itself result in development.	None	No
Strategic Policy S13: Protected Views	None, this policy seeks to conserve protected views and will not itself lead to development.	None	No
Open Spaces and Green Infrastructure			
Strategic Policy S14: Open Spaces and Green Infrastructure	None; this policy seeks to protect and enhance open spaces and green infrastructure.	None	No
Policy OS1: Protection and provision of open spaces	None; this policy seeks to protect and enhance open spaces and green infrastructure.	None	No
Policy OS2: Urban Greening	None, this policy sets requirements for urban greening to be delivered as part of new development, including the installation of biodiverse extensive or intensive features.	None	No
Policy OS3: Biodiversity	None, this policy sets requirements for developments to incorporate measures to enhance biodiversity.	None	No
Policy OS4: Biodiversity Net Gain	None, this policy sets requirements for major development to deliver Biodiversity Net Gain.	None	No
Policy OS5: Trees	None, this policy sets requirements for the protection of existing trees and the planting of additional trees.	None	No
Climate resilience			

Policy	Likely activities (operation) to result as a consequence of the proposal	Potential effects if proposal implemented	is the policy likely to have significant effects and therefore need to be scoped into the Appropriate Assessment?
Strategic Policy S15: Climate Resilience and Flood Risk	None, this policy sets out design requirements for development to adapt and be resilient to climate change and flood risk.	None	No
Policy CR1: Overheating and Urban Heat Island Effect	None, this policy sets out design requirements for development to prevent overheating and urban heat island effects, including through the design of the building.	None	No
Policy CR2: Flood Risk	None, this policy sets out design requirements for development with regard to flood risk.	None	No
Policy CR3: Sustainable drainage systems (SuDS)	None, this policy sets out design requirements for development to incorporate sustainable drainage systems, including by protecting heritage assets, enhancing biodiversity, and providing multifunctional open spaces.	None	No This policy states that "All development, transportation and public realm proposals must incorporate SuDS principles and be designed to minimise the volume and discharge rate of rainwater run-off into the combined drainage network in the City, ensuring that rainwater is managed as close as possible to the development." And "SuDS should be designed, where possible, to maximise contributions to water resource efficiency, water quality, biodiversity enhancement and the provision of multifunctional open spaces." This will contribute to mitigation for water quality impacts.
Policy CR4: Flood protection and flood defences	None, this The policy sets out design requirements for development with regard to flood risk. As such it is designed to safeguard people and the built environment and will not itself lead to development.	None	No
Strategic Policy S16: Circular Economy and Waste	None; this policy sets out how the Council will work with other authorities to manage waste, and safeguards existing facilities, but will not result in new development.	None	No
Policy CE1: Sustainable Waste Facilities and Transport	None, this policy sets requirements for development to incorporate waste facilities and sets criteria on how to reduce the environmental impact of transporting waste, including	None	No

Policy	Likely activities (operation) to result as a consequence of the proposal	Potential effects if proposal implemented	is the policy likely to have significant effects and therefore need to be scoped into the Appropriate Assessment?
	using rail and waterways and low/zero emissions transport modes. The policy itself will not result in development.		
Policy CE2: New waste management sites	None, this policy sets out criteria for the development of new waste management, handling and transfer sites within the City but, will not result in development itself..	None	No
The Temples, The Thames Policy Area and the Key Areas for Change			
Policy TP1: The Temples	None, this policy seeks to support the functions of the Inner and Middle Temples as a place for education and training. The policy also encourages opportunities to enhance and create additional greening and open spaces that enhance the historic character of the Temples but this policy itself will not result in development.	None	No
Strategic Policy S17: Thames Policy Area	Infrastructure development eg. river transport	Changes in water quality	Yes. The policy seeks to maintain and enhance the character of the riverside area and its functional uses for transport and recreation, including safeguarding biodiversity value. The policy also supports the use of the Thames for waterborne freight and waste transport, which would make a small contribution to water quality impacts. This policy also states that the character of the riverside will be enhanced by “Ensuring that development does not have an adverse effect on the River Thames and Tidal Tributaries Site of Metropolitan Importance for Nature Conservation and seeking opportunities to create or enhance riverside habitats.” This will help to safeguard the river against water quality / quantity impacts. The policy also safeguards sites for construction of the Thames Tideway Tunnel, which will improve wastewater treatment capacity.

Policy	Likely activities (operation) to result as a consequence of the proposal	Potential effects if proposal implemented	is the policy likely to have significant effects and therefore need to be scoped into the Appropriate Assessment?
Strategic Policy S18: Blackfriars	None; this policy sets out design principles for the area but the new development (e.g. homes, leisure) is defined by other policies.	None	No
Strategic Policy S19: Pool of London	None; this policy sets out design principles for the area but the new development (e.g. homes, leisure) is defined by other policies.	None	No This policy requires that car parking areas are removed upon redevelopment, within this policy area. This will contribute to a reduction in traffic to/from the City, and therefore air pollution.
Strategic Policy S20: Aldgate, Tower and Portsoken	None; this policy sets out design principles for the area but the new development (e.g. homes, leisure) is defined by other policies.	None	No
Strategic Policy S21: City Cluster	None; this policy sets out design principles for the area but the new development (e.g. homes, leisure) is defined by other policies.	None	No
Strategic Policy S22: Fleet Street and Ludgate	None; this policy sets out design principles for the area but the new development (e.g. homes, leisure) is defined by other policies.	None	No
Strategic Policy S23: Smithfield and Barbican	None; this policy sets out design principles for the area but the new development (e.g. homes, leisure) is defined by other policies.	None	No
Strategic Policy S24: Smithfield	None; this policy sets out design principles for the area but the new development (e.g. homes, leisure) is defined by other policies.	None	No
Strategic Policy S25: Liverpool Street	None; this policy sets out design principles for the area but the new development (e.g. homes, leisure) is defined by other policies.	None	No

Policy	Likely activities (operation) to result as a consequence of the proposal	Potential effects if proposal implemented	is the policy likely to have significant effects and therefore need to be scoped into the Appropriate Assessment?
Implementation			
Strategic Policy S27: Planning Contributions	None, this policy states that the City Corporation will seek appropriate contributions from developers to manage and mitigate the impact of development. As such, it will not itself lead to development.	None	No
Policy PC1: Viability Assessments	None, this policy outlines how viability assessments may be used to support developments that do not meet policy requirements. As such, it will not itself lead to development.	None	No