

**City of London Corporation**

**HRA Screening of the  
City of London Local Plan  
Report at Proposed  
Submission stage**

**Final report**

Prepared by LUC

March 2021

Version	Status	Prepared	Checked	Approved	Date
1.	Draft for client review	N. Collins Jon Pearson Elliot Smith	J. Pearson	J. Owen	08.01.2021
2.	Final	N. Collins J. Pearson E. Smith	J. Pearson	J. Owen	17.03.2021

# Contents

---

<b>Chapter 1</b>			
<b>Introduction</b>	<b>2</b>	<b>Chapter 4</b>	
		<b>Identification of European Sites and</b>	
		<b>factors contributing to their integrity</b>	<b>11</b>
The requirement to undertake Habitats Regulations			
Assessment of development plans	2	Identification of European Sites	11
		Factors contributing to site integrity	17
<b>Chapter 2</b>		<b>Chapter 5</b>	
<b>HRA Screening methodology</b>	<b>5</b>	<b>Assessment of likely significant effects</b>	<b>18</b>
Stages of HRA	5	Identification of other plans and projects which may have	
Recent case law	7	'in-combination' effects	18
		Screening of local plan policies for potential effects	20
<b>Chapter 3</b>		<b>Chapter 6</b>	
<b>Analysis of Local Plan</b>	<b>8</b>	<b>Conclusions and recommendations</b>	<b>39</b>
Background to the Local Plan	8		
Summary of the Proposed Submission Draft City Plan	8		
Assessment of 'likely significant effects' of the potential		<b>Appendix A</b>	
strategic allocations	10	<b>Plans with the potential for in-</b>	
Interpretation of 'likely significant effect'	10	<b>combination Effects</b>	

---

# Chapter 1

## Introduction

**1.1** The City of London Corporation is producing a Local Plan in order to provide the policy framework for development in the City up to 2036. 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 2036, will replace this.

**1.2** LUC has been appointed by the City of London Corporation to provide this Habitats Regulations Assessment (HRA) Screening opinion for the City of London Local Plan. 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.

**1.3** Following this, a draft Plan was produced in November 2018 for public consultation and was subject to HRA Screening. The views obtained from this consultation were taken into account by the City of London Corporation in the previous Proposed Submission Draft of the Local Plan, which was intended to be published for Regulation 19 consultation in June 2020. However, due to some significant changes to planning use classes recently introduced by the Government, some further changes are required to the Proposed Submission City Plan 2036. The updated Proposed Submission Draft is intended to be published for Regulation 19 consultation in January 2021 before submission for Examination-in-Public and adoption in 2022. The updated Proposed Submission Draft Plan is the subject of this HRA Screening report.

**1.4** The purpose of the HRA Screening stage is to determine whether any of the policies being proposed for the Local Plan are likely to have a significant effect on any Special Area of Conservation (SAC), Special Protection Area (SPA) or Ramsar site, and thus if a full Appropriate Assessment under the Habitats Regulations is required.

### **The requirement to undertake Habitats Regulations Assessment of development plans**

**1.5** The requirement to undertake HRA of development plans was confirmed by the amendments to the Habitats Regulations published for England and Wales in 2007<sup>1</sup>; the

---

<sup>1</sup> The Conservation (Natural Habitats, &c.) (Amendment) Regulations 2007 (2007) SI No. 2007/1843. TSO (The Stationery Office), London.

currently applicable version is the Habitats Regulations 2017, as amended<sup>2</sup>. 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 may only progress the Local Plan if it considers that the Plan will not adversely affect the integrity<sup>3</sup> of any European site. 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 (PPG).

**1.6** HRA refers to the assessment of the potential effects of a development plan on one or more European sites, including Special Protection Areas (SPAs) and Special Areas of Conservation (SACs):

- SACs are designated under the Habitats Regulations as amended and target particular habitat types (specified in Annex 1 to the Habitats Directive) and species (specified in Annex II to the Habitats Directive). These annexes to the Habitats Directive list habitat types and species (excluding birds) considered to be most in need of conservation at a European level. Designation of SACs also has regard to the threats of degradation or destruction to which the sites are exposed and, before EU exit day, 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 national site network.
- SPAs are areas classified<sup>4</sup> for rare and vulnerable birds or regularly occurring migratory species.

**1.7** The Government also expects potential SPAs (pSPAs)<sup>5</sup>, candidate SACs (cSACs)<sup>6</sup>, Sites of Community Importance (SCIs)<sup>7</sup> and Ramsar sites to be included in the HRA.

- Ramsar sites support internationally important wetland habitats and are listed under the Convention on Wetlands of International Importance especially as Waterfowl Habitat (Ramsar Convention, 1971).

**1.8** For ease of reference during HRA, these designations can be collectively referred to as European sites<sup>8</sup> despite Ramsar designations being at the international level.

**1.9** The overall purpose of the HRA is to conclude whether or not a proposal or policy, or the whole development plan, would adversely affect the integrity of the European site in question either alone or in combination with other plans and projects. This is judged in terms of the implications of the plan for the 'qualifying features' for which the European site was designated, i.e.:

- SACs – Annex I habitat types and Annex II species<sup>9</sup>;
- SPAs – Annex I birds and regularly occurring migratory species not listed in Annex I<sup>10</sup>;
- Ramsar sites – the reasons for listing the site under the Convention<sup>11</sup>.

**1.10** Significantly, HRA is based on the precautionary principle meaning that where uncertainty or doubt remains, an adverse impact should be assumed.

### Structure of the HRA Screening report

**1.11** 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:

**1.12 Chapter 2: HRA Screening methodology** sets out the approach used and the specific tasks undertaken during the screening stage of the HRA.

<sup>2</sup> 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.

<sup>3</sup> 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](#))

<sup>4</sup> Classified (a) before the day of the UK's exit from the EU (31 January 2020) in accordance with Article 4(1) or 4(2) of the European Union Wild Birds Directive for rare and vulnerable birds (as listed in Annex I of the Directive), and under Article 4(2) for regularly occurring migratory species not listed in Annex I, or (b) after exit day under the retained transposing regulations.

<sup>5</sup> Potential SPAs are sites that have been approved by the Minister for formal consultation but not yet proposed to the European Commission, as listed on the [GOV.UK website](#).

<sup>6</sup> Candidate SACs are sites that have been submitted to the European Commission, but not yet formally adopted, as listed on the JNCC's [SAC list](#).

<sup>7</sup> SCIs are sites that had been adopted by the European Commission before the day of the UK's exit from the EU (31 January 2020) but not yet formally designated as SACs by the UK Government.

<sup>8</sup> The term 'Natura 2000 sites' can also be used interchangeably with 'European sites' in the context of HRA, although the latter term is used throughout this report.

<sup>9</sup> As listed in the site's citation on the JNCC website (all features of European importance, both primary and non-primary, need to be considered).

<sup>10</sup> As identified in sections 3.1, 3.2 and 4.2 of the SPA's standard data form on the JNCC website; species for which the site assessment of population (abbreviated to 'Pop.' in table at section 3.1 and 3.2) is 'D' (non-significant population) are not qualifying features and are only relevant to the HRA if qualifying features are dependent on them. Information from SAC and Spa Standard Data Forms is also published by the JNCC in the ['Natura 2000 site details - spreadsheet'](#). At sites where there remain differences between species listed in the [2001 SPA Review](#) and the extant site citation in the standard data form, the relevant country agency (Natural England or Natural Resources Wales) should be contacted for further guidance.

<sup>11</sup> As set out in section 14 of the relevant 'Information Sheet on Ramsar Wetlands' available on the JNCC website.

**1.13 Chapter 3: Analysis of the Local Plan** summarises the content of the Local Plan and the types of impacts that the proposals might have on European sites in general.

**1.14 Chapter 4: Identification of European Sites and factors contributing to their integrity** lists and illustrates the European sites falling within the scope of the HRA, describes the qualifying features for which they are designated and sets out the key vulnerabilities of these features.

**1.15 Chapter 5: Assessment of likely significant effects** determines whether significant effects on European sites are likely to result from implementation of the proposals within the Local Plan.

**1.16 Chapter 6: Conclusion and recommendations** summarises the findings of the screening stage of the HRA and outlines recommendations and the next stage in the process.

# Chapter 2

## HRA Screening methodology

**2.1** The HRA Screening of the City of London Proposed Submission Draft Local Plan has been undertaken in line with current available guidance<sup>12,13,14,15</sup> and seeks to meet the requirements of the Habitats Regulations<sup>16</sup>.

### 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** The HRA should be undertaken by the ‘competent authority’, in this case the City of London Corporation, and LUC has been commissioned to do this on the Council’s behalf, although this is to be reported to and considered by City of London Corporation, as the competent authority, before adopting the Local Plan. The HRA also requires close working with Natural England as the statutory nature conservation body<sup>17</sup> 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

**2.4** In assessing the effects of a Local Plan in accordance with Regulation 105 of the Conservation of Habitats and Species Regulations 2017, as amended, 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:

**2.5** 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, as is the case for the Proposed Submission Draft City Plan, proceed to Step 2.

---

<sup>12</sup> 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. European Commission Environment DG, November 2001.

<sup>13</sup> Planning for the Protection of European Sites. Guidance for Regional Spatial Strategies and Local Development Documents. Department for Communities and Local Government (DCLG), August 2006.

<sup>14</sup> The Appropriate Assessment of Spatial Plans in England. A guide to why, when and how to do it. RSPB, August 2007.

<sup>15</sup> The Habitats Regulations Assessment of Regional Spatial Strategies and Sub-Regional Strategies. David Tyldesley and Associates, 2007.

<sup>16</sup> The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019.

<sup>17</sup> Regulation 5 of the Conservation of Habitats and Species Regulations 2017 (Statutory Instrument 2017 No. 1012).

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

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

**2.7** 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.

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

**2.8** 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.

**2.9** 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).

### Typical stages

**2.10** **Table 2.1** summarises the stages and associated tasks and outcomes typically involved in carrying out a full HRA, based on various guidance documents<sup>18,19,20</sup>.

*Table 2.1: Stages of HRA.*

Stage	Task	Outcome
<b>Stage 1:</b> HRA Screening	Description of the development plan. Identification of potentially affected European sites and factors contributing to their integrity. Review of other plans and projects. 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 <sup>21</sup> .	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.
<b>Stage 2:</b> Appropriate Assessment (where Stage 1 does not rule out likely significant effects)	Information gathering (development plan and European sites <sup>22</sup> ). Impact prediction. Evaluation of development plan impacts in view of conservation objectives. Where impacts are considered to affect qualifying features, identify how these effects will be avoided or reduced ('mitigation').	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. If effects remain after all alternatives and mitigation measures have been considered proceed to Stage 3.
<b>Stage 3:</b> 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.

<sup>18</sup> UK Government Planning Practice Guidance, available from <https://www.gov.uk/guidance/appropriate-assessment>

<sup>19</sup> 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.

<sup>20</sup> The HRA Handbook. David Tyldesley & Associates, a subscription based online guidance document: <https://www.dtapublications.co.uk/handbook/European>

<sup>21</sup> 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

<sup>22</sup> 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.

**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 both the Government and European Commission.

## Recent 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 of the Proposed Submission Draft City Plan does not rely upon avoidance or mitigation measures to draw conclusions as to whether the Plan could result in likely significant effects on European sites. Any such measures should be considered at the Appropriate Assessment stage.

**2.15** The approach to this HRA also takes account of the recent *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** The HRA considers 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 sites, but which may be important in supporting the ecological processes of the qualifying features, is considered.

# Chapter 3

## Analysis of Local Plan

### Background to the Local Plan

**3.1** The current City of London Local Plan was adopted in January 2015. The City of London Corporation is producing a new Local Plan, 'City Plan 2036', to replace this and provide the policy framework for development in the City up to 2036.

**3.2** A first stage of consultation (Issues and Options) on the plan was carried out over three months in 2016, 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<sup>23</sup>.

**3.3** The next stage of consultation (Draft Plan) on the plan was carried out over three months in 2018/19, seeking views on the draft policies. Copies of the comments received have been published on the City's website<sup>24</sup>.

**3.4** The City of London Corporation will be seeking final comment on the soundness of the Proposed Submission Draft City Plan 2036 in June 2020. These comments will be taken into account by the City of London Corporation before submission for Examination-in-Public and expected adoption in 2021.

### Summary of the Proposed Submission Draft City Plan

#### Strategic Aims: Vision, Strategic Objectives and Spatial Strategy

**3.5** The plan includes a vision for each of its four aims, as well as the following strategic objectives:

#### **CITY PLAN 2036 STRATEGIC OBJECTIVES**

##### **Contribute to a Flourishing Society**

To contribute to the development of a flourishing society where people are safe and feel safe, enjoy good health and wellbeing, have access to suitable employment opportunities and housing in cohesive communities and live enriched lives, achieving their full potential.

<sup>23</sup> City of London (2017) Issues and Options Consultation Comments Summary. Available at: <https://www.cityoflondon.gov.uk/services/environment-and-planning/planning/planning-policy/Pages/issues-and-options-consultation.aspx>.

<sup>24</sup> City of London (2019) Draft City of London Local Plan Consultation Comments. Available at: [www.cityoflondon.gov.uk/services/environment-and-planning/planning/planning-policy/Pages/Local-Plan-Review.aspx](http://www.cityoflondon.gov.uk/services/environment-and-planning/planning/planning-policy/Pages/Local-Plan-Review.aspx).

### Support a Thriving Economy

To support a thriving economy, maintaining the City's position as a global hub for innovation in financial and professional services, commerce and culture.

### Shape Outstanding Environments

To shape the future City, ensuring that it is physically well connected, sustainable and responsive, resilient to natural and man-made threats, and delivers outstanding buildings, streets, public spaces, and heritage assets.

### Key areas for Change

To ensure that the challenges facing the Key Areas for Change are met, complementing the core business function of the City, supporting the development of its global business offer and world class cultural, heritage and creative facilities and distinguishing the City from other global centres.

**3.6** In addition, the plan includes a spatial strategy, which sets out how the City Corporation will facilitate a vibrant, thriving and inclusive City, supporting a diverse and sustainable London within a globally successful UK. The plan notes, that an overarching imperative of the spatial strategy is to ensure that the City of London transitions to a zero carbon and zero emission City, improving air quality and delivering additional greening to the City's buildings and spaces.

**3.7** The structure of the remainder of the plan is based on the three strategic aims of the Corporate Plan<sup>25</sup>, which are to:

- Contribute to a Flourishing Society;
- Support a Thriving Economy; and
- Shape Outstanding Environments.

**3.8** A fourth theme, 'Key Areas for Change', is also included within the Proposed Submission Draft City Plan and makes consideration of each Key Area for change:

- Thames Policy Area;
- Blackfriars;
- Pool of London;
- Aldgate and Tower;
- City Cluster;
- Fleet Street and Ludgate;
- Smithfield and Barbican; and

- Liverpool Street.

**3.9** A fifth theme of Implementation has been added to focus on how the Plan will be delivered.

### Policies

**3.10** Policies in the Proposed Submission Draft City Plan are presented under each of the Strategic Aims and within the following sections:

- Contribute to a Flourishing Society
  - Healthy and Inclusive City
  - Safe and Secure City
  - Housing
- Support a Thriving Economy
  - Offices
  - Retailing
  - Culture, Visitors and the Night-Time Economy
  - Smart Infrastructure and Utilities
- Shape Outstanding Environments
  - Design
  - Vehicular Transport and Servicing
  - Walking, Cycling and Healthy Streets
  - Historic Environment
  - Tall Buildings and Protected Views
  - Open Spaces and Green Infrastructure
  - Climate Resilience and Flood Risk
  - Circular Economy and Waste
- Key Areas for Change
  - Thames Policy Area
  - Blackfriars Key Area of Change
  - Pool of London Key Area of Change
  - Aldgate and Tower Key Area of Change
  - City Cluster Key Area of Change
  - Fleet Street and Ludgate Key Area of Change
  - Smithfield and Barbican Key Area of Change
  - Liverpool Street Key Area of Change

<sup>25</sup> City of London (2018) Our Corporate Plan 2018-2023. Available at: [www.cityoflondon.gov.uk/about-the-city/how-we-make-decisions/Pages/corporate-plan.aspx?page=all](http://www.cityoflondon.gov.uk/about-the-city/how-we-make-decisions/Pages/corporate-plan.aspx?page=all).

**3.11** The final section of the document sets out the Implementation for the Proposed Submission Draft City Plan.

### Housing and Employment Land Provision

**3.12** The Proposed Submission Draft City Plan makes provision for 1,460 additional residential units in the City during the period 2019/20 to 2028/29, with the annual average rate continuing beyond 2028/29 until such time as the London Plan is further reviewed, and states that this new housing will be located on suitable sites in or near identified residential areas.

**3.13** In addition, the plan makes provision to increase the City's office floorspace stock by a minimum of 2,000,000m<sup>2</sup> net during the period 2016 to 2036, phased as follows:

- 2016 - 2021 750,000m<sup>2</sup>
- 2021 - 2026 750,000m<sup>2</sup>
- 2026 - 2031 250,000m<sup>2</sup>
- 2031 - 2036 250,000m<sup>2</sup>

### Assessment of 'likely significant effects' of the potential strategic allocations

**3.14** Regulation 105 of the Conservation of Habitats and Species Regulations 2017<sup>26</sup> (the 'Habitats Regulations'), requires an assessment of the 'likely significant effects' of a land use plan. Based on consideration of the nature of the plan's proposals and the qualifying features of the scoped-in European sites, likely significant effects have been considered for each potential strategic site allocation and development scenario with respect to:

- Physical loss of/damage to habitat.
- Non-physical disturbance e.g. noise/vibration or light pollution.
- Air pollution.
- Increased recreation pressure.
- Water quantity.
- Water quality.

**3.15** 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 policy would have a significant effect on the integrity of a European site.

### Interpretation of 'likely significant effect'

**3.16** 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.

**3.17** In the Waddenzee case<sup>27</sup>, 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:

- 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); and
- 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).

**3.18** A relevant opinion delivered to the Court of Justice of the European Union<sup>28</sup> 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."*

**3.19** 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'.

<sup>26</sup> SI No. 2019/579

<sup>27</sup> ECJ Case C-127/02 "Waddenzee" Jan 2004.

<sup>28</sup> Advocate General's Opinion to CJEU in Case C-258/11 Sweetman and others v An Bord Pleanala 22nd Nov 2012.

# Chapter 4

## Identification of European Sites and factors contributing to their integrity

### Identification of European Sites

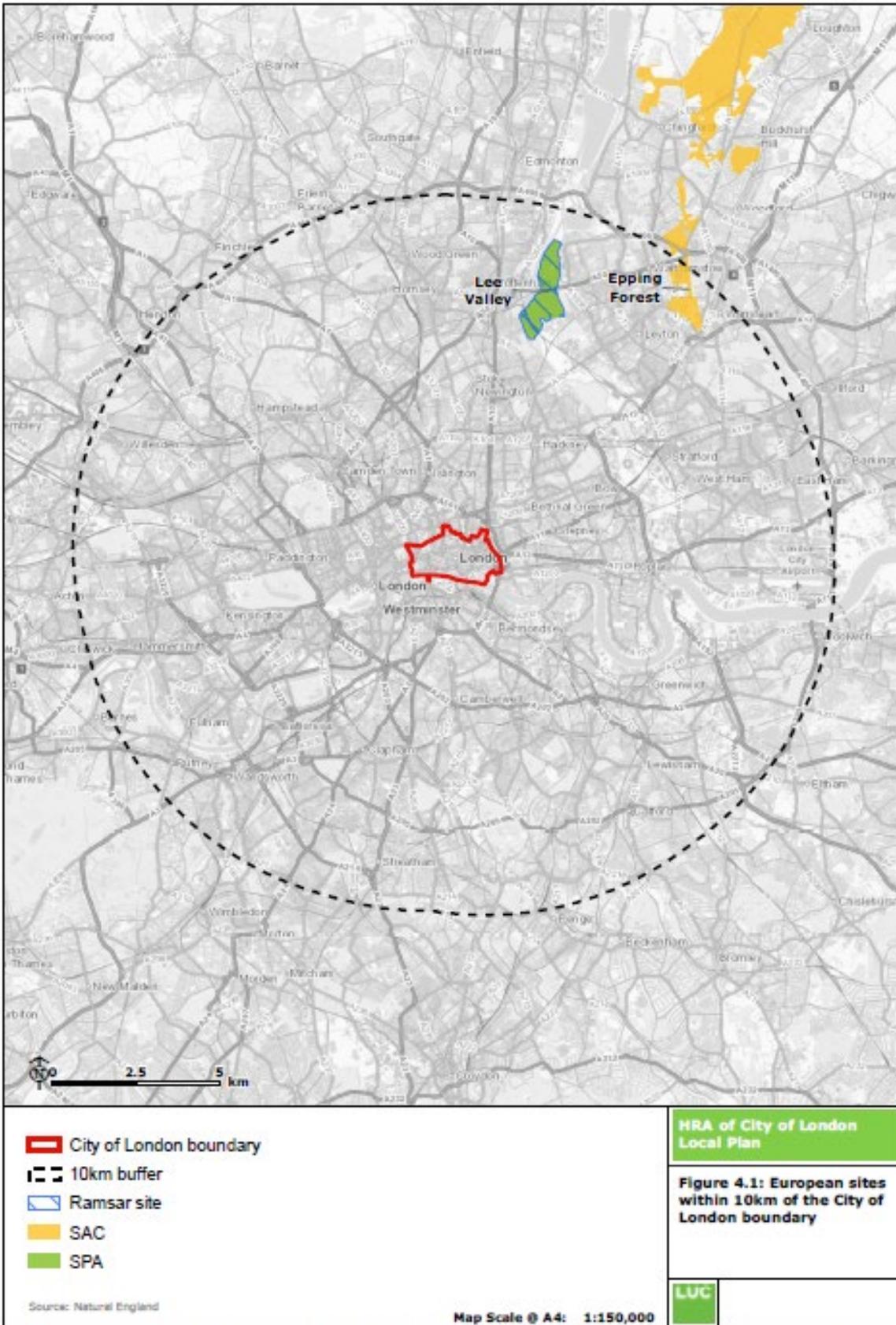
**4.1** As a starting point to identify European sites that may be affected by proposals in the Proposed Submission Draft City Plan, a Geographical Information System (GIS) was used to map the locations and boundaries of European sites within 10km of the City of London boundary. This distance was previously agreed with Natural England for the HRA of the Adopted City of London Local Plan and is considered a precautionary method of identifying most European sites that could potentially be affected by the scale and nature of development being proposed by the Proposed Submission Draft City Plan. In addition, a check was made to identify any more distant European sites which could nevertheless be significantly affected by development within the City of London due to functional links with the plan area but no such European sites were identified.

**4.2** As illustrated in **Figure 4.1**, no European sites lie within the City of London boundary but two lie wholly or partially within the 10km buffer area:

- Epping Forest SAC; and
- Lee Valley SPA and Ramsar site.

**4.3** Details of the qualifying features for which these sites are designated and which must be maintained in good condition to preserve site integrity are presented in **Table 4.1**. Current conditions of these features and key pressures and threats upon them are also described, as are non-qualifying habitats and species upon which the qualifying habitats and/or species depend. This information has informed the analysis of how the Proposed Submission Draft City Plan may affect the integrity of the site in question.

Figure 4.1 : European sites within 10km of the City of London boundary



Service Layer Credits: Contains OS data © Crown Copyright and database right 2019 CB:BP EB:Beetham\_m LUC 6824-01\_002\_A4P\_European\_sites 24/02/2020

\\ad.landuse.co.uk\London\nas1\data\5500\5547 City of London SA & HRA Screening Support\B Project Working\DD\Exports\Working\6824-01\_002\_A4P\_European\_sites.pdf

Table 4.1: European sites with the potential to be affected.

Site name	Designation and code <sup>29 30 31</sup>	Qualifying features <sup>29 30 31</sup>	Conservation Objectives <sup>32</sup>	Current pressures or threats <sup>33</sup>	Results of SSSI condition survey <sup>34</sup>	Non-qualifying habitats and species upon which the qualifying habitats and/or species depend <sup>35 36 37 38</sup>
<b>Epping Forest SAC</b>	SAC UK0012720	<p><i>Habitats</i></p> <p>Primary Reason for Selection:</p> <p><b>9120 Atlantic acidophilous beech forests with Ilex and sometimes also Taxus in the shrublayer (Quercion robori-petraeae or Ilici-Fagenion)</b></p> <p>Epping Forest represents Atlantic acidophilous beech forests in the north-eastern part of the habitat's UK range. Although the epiphytes at this site have declined, largely as a result of air pollution, it remains important for a range of rare species, including the moss <i>Zygodon forsteri</i>. The long history of pollarding, and resultant large number of veteran trees, ensures that the site is also rich in fungi and dead-wood invertebrates.</p> <p>Secondary Qualifying Reason for Selection:</p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring:</p> <ul style="list-style-type: none"> <li>■ the extent and distribution of qualifying natural habitats and habitats of qualifying species;</li> <li>■ the structure and function (including typical species) of</li> </ul>	<p>The main pressures and threats to this site include:</p> <ul style="list-style-type: none"> <li>■ risks of atmospheric nitrogen deposition, and public access and disturbance upon wet heaths, dry heaths and beech forest;</li> <li>■ undergrazing upon wet and dry heaths;</li> <li>■ changes in species distribution, disease and invasive species upon beech forest; and</li> <li>■ water quantity changes, water pollution and</li> </ul>	<p>Area favourable: 35%</p> <p>Area unfavourable but recovering: 48%</p> <p>Area unfavourable with no change: 15%</p> <p>Area unfavourable and declining: 2%</p>	<p>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 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.</p> <p>The supplementary advice also states:</p> <p>The qualifying habitat comprises beech <i>Fagus sylvatica</i> forests with holly <i>Ilex aquifolium</i>, 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 <i>Fagus sylvatica</i> and oak <i>Quercus</i> spp. was common.</p> <p>Wet heath usually occurs on acidic, nutrient-poor substrates, such as shallow peats or sandy soils with impeded drainage.</p> <p>European dry heaths typically occur on freely-draining, acidic to circumneutral soils with generally low nutrient content. Nearly all dry heath is seminatural, being derived from woodland through a long history of grazing and burning. Most dry heaths are managed as extensive grazing for livestock.</p>

<sup>29</sup> JNCC (2017) Designated and Proposed Ramsar sites in the UK and Overseas. Available at: [archive.jncc.gov.uk/page-1389](http://archive.jncc.gov.uk/page-1389).

<sup>30</sup> JNCC (2020) SACs in the United Kingdom. Available at: [sac.jncc.gov.uk/site/england](http://sac.jncc.gov.uk/site/england).

<sup>31</sup> JNCC (2019) Special Protection Areas (SPAs): UK. Available at: [jncc.gov.uk/our-work/list-of-spas/](http://jncc.gov.uk/our-work/list-of-spas/).

<sup>32</sup> Natural England (2018/2019) Conservation Objectives for European Sites. Available at: [publications.naturalengland.org.uk/category/6490068894089216](http://publications.naturalengland.org.uk/category/6490068894089216).

<sup>33</sup> Natural England (2014/2015) Site Improvement Plans by region. Available at: [publications.naturalengland.org.uk/category/5458594975711232](http://publications.naturalengland.org.uk/category/5458594975711232).

<sup>34</sup> Natural England (2020) Designated Sites View: Search for designated site details. Available at: [designatedsites.naturalengland.org.uk](http://designatedsites.naturalengland.org.uk).

<sup>35</sup> 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>.

<sup>36</sup> 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>.

<sup>37</sup> <https://www.bto.org/understanding-birds/birdfacts>

<sup>38</sup> Information Sheet on Ramsar Wetlands (RIS) UK11034: Lee Valley. JNCC, September 2000. Available at: <https://jncc.gov.uk/our-work/ramsar-sites/>.

Site name	Designation and code <sup>29 30 31</sup>	Qualifying features <sup>29 30 31</sup>	Conservation Objectives <sup>32</sup>	Current pressures or threats <sup>33</sup>	Results of SSSI condition survey <sup>34</sup>	Non-qualifying habitats and species upon which the qualifying habitats and/or species depend <sup>35 36 37 38</sup>
		<p><b>4010 Northern Atlantic wet heaths with <i>Erica tetralix</i></b></p> <p><b>4030 European dry heaths</b></p> <p><i>Species</i></p> <p>Primary Reason for Selection:</p> <p><b>1083 Stag beetle <i>Lucanus cervus</i></b></p> <p>Epping Forest is a large woodland area in which records of stag beetle <i>Lucanus cervus</i> are widespread and frequent; the site straddles the Essex and east London population centres. Epping Forest is a very important site for fauna associated with decaying timber, and supports many Red Data Book and Nationally Scarce invertebrate species.</p>	<p>qualifying natural habitats;</p> <ul style="list-style-type: none"> <li>■ the structure and function of the habitats of qualifying species;</li> <li>■ the supporting processes on which qualifying natural habitats and the habitats of qualifying species rely;</li> <li>■ the populations of qualifying species; and,</li> <li>■ the distribution of qualifying species within the site.</li> </ul>	<p>invasive species upon wet heaths.</p>		<p>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: <i>Calluna vulgaris</i>, <i>Erica cinerea</i>, <i>E. tetralix</i>, <i>Salix repens</i>, <i>Ulex minor</i>, <i>Vaccinium spp.</i> <i>Carex panicea</i>, <i>C. pulicaris</i>, <i>Dactylorhiza maculata</i>, <i>Eleocharis spp.</i>, <i>Eriophorum angustifolium</i>, <i>Juncus acutiflorus</i>, <i>J. articulatus</i>, <i>Molinia caerulea</i>, <i>Anagallis tenella</i>, <i>Drosera spp.</i>, <i>Galium saxatile</i>, <i>Genista anglica</i>, <i>Polygala serpyllifolia</i>, <i>Potentilla erecta</i>, <i>Succisa pratensis</i>.</p> <p><i>Pedicularis sylvatica</i>. For dry heath, this includes: <i>Calluna vulgaris</i>, <i>Erica cinerea</i>, <i>E. tetralix</i>, <i>Ulex minor</i>, <i>Vaccinium spp</i> <i>Genista anglica</i>, <i>Agrostis spp.</i>, <i>Carex spp.</i>, <i>Danthonia decumbens</i>, <i>Deschampsia flexuosa</i>, <i>Festuca spp.</i>, <i>Molinia caerulea</i>, <i>Nardus stricta</i>, <i>Galium saxatile</i>, <i>Hypochaeris radicata</i>, <i>Lotus corniculatus</i>, <i>Pedicularis sylvatica</i>, <i>Plantago lanceolata</i>, <i>Polygala spp.</i> <i>Potentilla erecta</i>, <i>Rumex acetosella</i>, <i>Succisa pratensis</i>, <i>Scilla verna</i>, <i>Serratula tinctoria</i>, <i>Teucrium scorodonia</i> <i>Thymus praecox</i>, <i>Viola riviniana</i>,</p> <p>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 <i>Fagus sylvatica</i>, Oak <i>Quercus robur</i> and <i>Quercus petraea</i>, Holly <i>Ilex aquifolium</i>, Bramble <i>Rubus fruticosus</i> agg. Honeysuckle <i>Lonicera periclymenum</i>, Hornbeam <i>Carpinus betulus</i>, Silver birch <i>Betula pendula</i>, Downy birch <i>Betula pubescens</i>, Yew <i>Taxus baccata</i>, Elder <i>Sambucus nigra</i>, Goat willow <i>Salix caprea</i> and Wild Cherry <i>Prunus avium</i>. 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.</p>

Site name	Designation and code <sup>29 30 31</sup>	Qualifying features <sup>29 30 31</sup>	Conservation Objectives <sup>32</sup>	Current pressures or threats <sup>33</sup>	Results of SSSI condition survey <sup>34</sup>	Non-qualifying habitats and species upon which the qualifying habitats and/or species depend <sup>35 36 37 38</sup>
						Key species of ground flora, epiphytic bryophytes, mosses, liverworts and lichens are also listed.
Lee Valley SPA and Ramsar Site	SPA UK9012111 Ramsar UK11034	<p><i>Species</i></p> <p><i>Over winter:</i></p> <p><b>A021 Great bittern <i>Botaurus stellaris</i></b> 6 individuals representing 6.0% of the wintering population in Great Britain (5-year peak mean, 1992/3-1995/6).</p> <p><b>A051 Gadwall <i>Anas strepera</i></b> 445 individuals representing an average of 2.6% of the population in Great Britain (5-year peak mean 1998/9-2002/3)</p> <p><b>A056 Northern shoveler <i>Anas clypeata</i></b> 287 individuals representing an average of 1.9% of the population in Great Britain (5-year peak mean 1998/9-2002/3).</p>	<p>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:</p> <ul style="list-style-type: none"> <li>■ the extent and distribution of the habitats of the qualifying features;</li> <li>■ the structure and function of the habitats of the qualifying features;</li> <li>■ the supporting processes on which the habitats of the qualifying features rely;</li> <li>■ the population of each of the qualifying features; and,</li> </ul>	<p>The main pressures and threats to this site include:</p> <ul style="list-style-type: none"> <li>■ water pollution, hydrological changes, public access and disturbance, inappropriate scrub control, fish stocking within fisheries and invasive species upon Bitter, Gadwall and Shoveler; and</li> <li>■ inappropriate cutting and mowing and the risks of atmospheric nitrogen deposition upon Bittern.</li> </ul>	<p>Area favourable: 52%</p> <p>Area unfavourable but recovering: 48%</p>	<p>The information below is drawn from the supplementary advice on conserving and restoring site features.</p> <p><b>Great bittern</b></p> <ul style="list-style-type: none"> <li>■ 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.</li> <li>■ Reedbeds.</li> <li>■ Open terrain – bittern favour large areas of open terrain, largely free of obstructions, in and around its nesting, roosting and feeding areas. Often 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.</li> <li>■ Key prey species include eel, rudd, roach, frogs, toads and invertebrates.</li> </ul> <p>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.</p> <p><b>Gadwall</b></p> <ul style="list-style-type: none"> <li>■ Standing open water - gadwall favour gravel pits and reservoirs during the winter period where they feed on seeds, leaves and stems of water plants.</li> <li>■ Preferred food plants – sweet grass (<i>Glyceria fluitans</i>), creeping bent (<i>Arostis stolonifera</i>), stoneworts (<i>Chara</i>), pondweeds (<i>Potamogeton</i>, <i>Ceratophyllum spp.</i>, <i>Ruppia</i>, <i>Elodea nuttallii</i>).</li> </ul>

Site name	Designation and code <sup>29 30 31</sup>	Qualifying features <sup>29 30 31</sup>	Conservation Objectives <sup>32</sup>	Current pressures or threats <sup>33</sup>	Results of SSSI condition survey <sup>34</sup>	Non-qualifying habitats and species upon which the qualifying habitats and/or species depend <sup>35 36 37 38</sup>
			<ul style="list-style-type: none"> <li>■ the distribution of the qualifying features within the site.</li> </ul>			<p>Each of the supporting SSSIs support gadwall in numbers which are sufficient to qualify them as being of national importance.</p> <p><b>Northern shoveler</b></p> <ul style="list-style-type: none"> <li>■ Standing open water - in winter, shoveler frequent shallow water areas on marshes, flooded pasture, reservoirs and lakes with plentiful, marginal reeds or emergent vegetation and are found throughout.</li> <li>■ Preferred food plants – <i>Scirpus</i>, <i>Eleocharis</i>, <i>Carex</i>, <i>Potamogeton</i>, <i>Glyceria</i>. Shoveler also feed on zooplankton (e.g. <i>Hydrobia</i>, crustaceans, caddisflies, <i>Diptera</i>, 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.</li> </ul> <p><u>BTO Bird Facts</u></p> <p>The British Trust for Ornithology records the site's qualifying bird species' diets as:</p> <ul style="list-style-type: none"> <li>■ Bittern: mostly fish, amphibians, insects but wide variety;</li> <li>■ Shoveler: omnivorous (incl. insects, crustaceans, molluscs, seeds); and</li> <li>■ Gadwall: leaves and shoots.</li> </ul> <p>The Information Sheet on Ramsar Wetlands 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.</p>

## Factors contributing to site integrity

4.4 Information on European sites was collated as follows:

### Site name and designation code

4.5 This information was obtained from Natural England Natura 2000 and Ramsar forms from the JNCC website<sup>39 40 41</sup>.

### Qualifying features

4.6 This information was obtained from the Natura 2000 and Ramsar forms and denotes the habitats and species i.e. 'qualifying features' for which the sites have been awarded EC conservation status. It is these qualifying features (primary and secondary) which the HRA must explicitly safeguard.

### Conservation objectives

4.7 The qualifying features form the basis of Natural England's Conservation Objectives for European Sites<sup>42</sup>, which provide additional information about each of the designated sites.

### Current pressures or threats

4.8 This information was obtained from the Site Improvement Plan for each designated site as produced by Natural England<sup>43</sup>, which informed the HRA's identification of the types of effects development brought forwards by the Proposed Submission Draft City Plan may have on the qualifying features of the designated sites. Consideration was also given to whether the European sites' qualifying features may be sensitive to other types of effect from the Plan.

### Results of SSSI condition survey

4.9 All Natura 2000 sites in England are also nationally designated as SSSIs, and thus information obtained from Natural England's review of SSSI condition is available for all of the identified sites<sup>44</sup>. Although some Ramsar sites do not additionally receive SSSI designation, the Lee Valley does, and so relevant information can be obtained. There are four SSSIs in the Lee Valley Regional Park and one SSSI within Epping Forest with condition assessments. Regard was had to

whether SSSI condition information related to the same features for which the European site is designated.

### Non-qualifying habitats and species upon which the qualifying habitats and/or species depend

4.10 This information was obtained from Natural England's supplementary advice on conserving and restoring site features for Epping Forest (SAC)<sup>45</sup> and Lee Valley Special Protection Area (SPA)<sup>46</sup>; the British Trust of Ornithology website<sup>47</sup>; and the JNCC information sheet on the Lee Valley Ramsar site<sup>48</sup>.

<sup>39</sup> JNCC (2017) Designated and Proposed Ramsar sites in the UK and Overseas. Available at: [archive.jncc.gov.uk/page-1389](https://archive.jncc.gov.uk/page-1389).

<sup>40</sup> JNCC (2020) SACs in the United Kingdom. Available at: [sac.jncc.gov.uk/site/england](https://sac.jncc.gov.uk/site/england).

<sup>41</sup> JNCC (2019) Special Protection Areas (SPAs): UK. Available at: [jncc.gov.uk/our-work/list-of-spas/](https://jncc.gov.uk/our-work/list-of-spas/).

<sup>42</sup> Natural England (2018/2019) Conservation Objectives for European Sites. Available at: [publications.naturalengland.org.uk/category/6490068894089216](https://publications.naturalengland.org.uk/category/6490068894089216).

<sup>43</sup> Natural England (2014/2015) Site Improvement Plans by region. Available at: [publications.naturalengland.org.uk/category/5458594975711232](https://publications.naturalengland.org.uk/category/5458594975711232).

<sup>44</sup> Natural England (2020) Designated Sites View: Search for designated site details. Available at: [designatedsites.naturalengland.org.uk](https://designatedsites.naturalengland.org.uk).

<sup>45</sup> European Site Conservation Objectives: Supplementary advice on conserving and restoring site features Epping Forest (SAC). Natural England, January 2019. Available at:

<https://publications.naturalengland.org.uk/publication/5908284745711616>.

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

<sup>47</sup> <https://www.bto.org/understanding-birds/birdfacts>

<sup>48</sup> Information Sheet on Ramsar Wetlands (RIS) UK11034: Lee Valley. JNCC, September 2000. Available at: <https://jncc.gov.uk/our-work/ramsar-sites/>.

# Chapter 5

## Assessment of likely significant effects

### Identification of other plans and projects which may have ‘in-combination’ effects

**5.1** 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*”.

**5.2** The first stage in identifying ‘in-combination’ effects involves identifying which other plans and projects in addition to the City of London Proposed Submission Draft Local Plan may affect the European sites that are the focus of this assessment. There are a large number of potentially relevant plans and projects which could be considered – therefore the review at this stage focuses on planned spatial growth within the authorities adjacent to the City of London and within the authorities containing the identified European sites within 10 km of the City of London boundary. HRA guidance<sup>49</sup> states that in deciding which other plans may be relevant to an in-combination assessment, only those which are adopted or which been formally published or submitted for final consultation, examination or adoption need to be considered. As such, the in-combination assessment only reviewed other Local Plans and their HRAs if the plan had been published for Regulation 19 consultation on a proposed submission version of the plan or had been submitted for Examination.

**5.3** In addition to development plans, consideration was also made of the potential in-combination effects of development projects that are in the planning system, but are not yet completed, and of a scale to be capable of leading to significant effects in-combination.

**5.4** The purpose of the review of other plans or projects was to identify any components that could have an impact on the European sites scoped-in to the HRA of the Proposed Submission Draft City Plan e.g. proposals for development near to these sites which could have implications in terms of increased traffic, water use or recreational disturbance. The potential for the effects of these plans or projects to combine with the effects of the Proposed Submission Draft City Plan has been considered as part of the screening assessment

---

<sup>49</sup> DTA Publications. 2018. HRA Handbook. Available from [www.dtapublications.co.uk/handbook/](http://www.dtapublications.co.uk/handbook/) [accessed 21 February 2020].

below and will continue to be assessed where necessary during further iterations of the HRA (if required).

### **Assessment of potential for in-combination effects with other plans**

**5.5 Appendix A** lists the other plans that were reviewed, outlining the components of each plan that could have an impact on nearby European sites and considering the findings of the accompanying HRA work (where available).

**5.6** The HRA of the adopted London Plan found no adverse effects on the integrity of European sites, either alone or in combination with other plans or projects. Moreover, the HRA for the Intend to Publish new London Plan is due to be laid before the London Assembly and the HRA for this found no adverse effects on the integrity of European sites, either alone or in combination with other plans or projects.

**5.7** In addition, HRAs of all of the neighbouring local authorities' plans found no significant effects on the integrity of European sites, either alone or in combination with other plans or projects:

- Borough of Hackney;
- Borough of Islington;
- Borough of Lambeth;
- Borough of Southwark;
- Borough of Tower Hamlets;
- Westminster City; and
- Borough of Camden.

**5.8** Epping Forest SAC and Lee Valley SPA and Ramsar Site are located within the Borough of Broxbourne, East Hertfordshire District, the Borough of Waltham Forest, Epping Forest District and the Borough of Redbridge. The HRAs of these local authorities' plans generally also found no significant effects on the integrity of European sites, either alone or in combination with other plans or projects, although two points should be noted:

- The emerging HRA of the Proposed Submission (Regulation 19 consultation) version of the Waltham Forest Local Plan Part 1 has not yet been able to conclude that there would be no adverse effect on the Epping Forest SAC from air pollution, as an air quality study had yet to be completed.
- The findings of HRA of the Submission version of the Epping Forest Local Plan in relation to air pollution effects on Epping Forest Sac were not accepted by Natural England. The Local Plan Inspector advised the Council to undertake additional HRA work to address these concerns. After working with Natural England for

some time, the Council has now agreed an Interim Air Pollution Strategy that Natural England and the Council believe will be acceptable to the Local Plan Inspector although it has yet to be considered by the Inspector.

**5.9** Notwithstanding the fact that the HRA of these local plans have not yet ruled out air pollution effects on Epping Forest SAC, in-combination effects from the City Plan 2036 were ruled out because the potential for the plan to result in increases in road traffic and associated air pollution at the scoped-in European sites was judged to be negligible for the following reasons:

- The main types of development provided for by the Proposed Submission Draft City Plan are large scale office development and small-scale residential development.
- All development is required to be car-free except for designated Blue Badge space or in exceptional circumstances.
- The plan area is exceptionally well-served by public transport, as well as subject to congestion-charging.

**5.10** Furthermore, the plan areas for the joint Waste Plans for North London, Hertfordshire and Essex and Southend-on-Sea include Epping Forest SAC and Lee Valley SPA and Ramsar Site. The HRAs for these adopted and emerging plans also found no significant effects on the integrity of European sites, either alone or in combination with other plans or projects.

### **Assessment of potential for in-combination effects with other projects**

**5.11** With regards to development projects, the potential impacts of the following Nationally Significant Infrastructure Projects (NSIPs) on Epping Forest SAC and Lee Valley SPA and Ramsar site were assessed:

- Thames Tideway Tunnel;
- North London Electricity Line Reinforcement;
- Silvertown Tunnel; and
- North London Heat and Power Project.

**5.12** The HRA's for the Thames Tideway Tunnel, North London Electricity Line Reinforcement and Silvertown Tunnel concluded that there would be no likely significant effects of these projects on any European sites, either alone or in-combination with other projects and plans.

**5.13** The Environmental Statement for the North London Heat and Power Project determined that the effects of the project on Epping Forest SAC and Lee Valley SPA and Ramsar site would be not significant.

**5.14** In addition to the above NSIPs, the development of Crossrail and the Heathrow Airport expansion also have potential to impact designated sites. Part of the developing Crossrail underground route crosses the City of London. However, the information papers, initially presented to the House of Commons Select Committee considering the Crossrail Bill in January 2006, outlined that the proposals will not affect any statutorily designated ecological sites.

**5.15** Development consent was due to be sought for Crossrail 2, a proposed north-south route that would not pass through the City of London itself, in the early 2020s but the process is currently on hold. As such, the project is not yet sufficiently advanced to require inclusion in the in-combination assessment for the HRA Proposed Submission Draft City Plan but will itself be subject to HRA as part of the consenting process, at which time the potential for its effects to act in combination with those of other plans and projects, including the Proposed Submission Draft City Plan, will be assessed.

**5.16** It is recognised that the government has backed expansion at Heathrow Airport, including a third runway and sixth terminal. The 2018 Airports National Policy Statement sets out the need for additional airport capacity in the south-east of England and the reasons why government believes that need is best met by a north-west runway at Heathrow Airport. However, the application for development of this NSIP is at pre-application stage and a full application has not yet been submitted to the Planning Inspectorate.

**5.17** In addition, in February 2020 the Court of Appeal ruled that the Airports National Policy Statement, which sets the planning policy framework Heathrow Airport will use to bring forth a planning application for its third runway, was unlawful because it failed to take into account the government's commitment to provisions in the Paris agreement on climate change (ratified by the UK in November 2016). Following this however, in December 2020 the Supreme Court reversed the decision to block plans for a third runway and developers can now seek planning permission for the project.

**5.18** As such it is not yet sufficiently advanced to require inclusion in the in-combination assessment for the HRA of the Proposed Submission Draft City Plan, but will itself be subject to HRA as part of the consenting process, at which time the potential for its effects to act in combination with those of other plans and projects, including the Proposed Submission Draft City Plan, will be assessed. It is noted that the 2019

Preliminary Environmental Information Report<sup>50</sup> states that some European sites may experience significant negative effects as a result of the Heathrow expansion, however the report does not identify Epping Forest SAC or Lee Valley SPA and Ramsar as sites that could be affected.

**5.19** In addition to the expansion of Heathrow Airport, the UK Aviation Strategy<sup>51</sup> also supports increased use of existing runways at all airports in the South East (with the exception of the new runway supported for Heathrow). The flight paths for London City Airport and Stansted Airport are such that increased air traffic may result in increased air pollution at the Epping Forest SAC<sup>52 53</sup>. Increases in the current air traffic movement caps will be subject to consent by the relevant Local Planning Authority or the Secretary of State, dependent on their size (see paragraphs 1.26 and 1.27 within the Aviation Strategy<sup>54</sup>). As such, any future proposals for increased runway use are not yet sufficiently advanced to require inclusion in the in-combination assessment for the HRA Proposed Submission Draft City Plan but will themselves be subject to HRA as part of the consenting process, at which time the potential for their effects to act in combination with those of other plans and projects, including the Proposed Submission Draft City Plan, will be assessed.

## Screening of local plan policies for potential effects

**5.20** As described in **Chapter 2**, an assessment was carried out in order to identify the potential for each of the Proposed Submission Draft City Plan policies to have likely significant effects on European sites, including in light of potential effects on the non-qualifying habitats and species upon which the qualifying habitats and/or species depend.

**5.21** It is noted that the September 2020 changes to the Use Classes Order resulted in a wider range of uses being categorised under the same use class. This means that there is the potential for a development allocation to be converted into other uses within the same use class without planning permission. Therefore, on a precautionary basis, it was necessary for the HRA screening to assume that any proposed development could result in the future change of use to any other use within the same use class, and to consider the potential effects of all of these uses.

<sup>50</sup> Heathrow Airport Expansion Consultation (2019) Preliminary Environmental Information Report. Available at: [aec.heathrowconsultation.com/topics/biodiversity/#a-summary-of-the-effects-reported-in-the-preliminary-environmental-information-report-peir-2](https://aec.heathrowconsultation.com/topics/biodiversity/#a-summary-of-the-effects-reported-in-the-preliminary-environmental-information-report-peir-2).

<sup>51</sup> Department of Transport (2018) Aviation strategy. Available at: [www.gov.uk/government/collections/aviation-strategy#documents](https://www.gov.uk/government/collections/aviation-strategy#documents).

<sup>52</sup> London Stansted Airport (2018) Arrivals and Departure Maps. Available at: [www.stanstedairport.com/community/noise/noise-in-your-area/arrivals-and-departure-maps](https://www.stanstedairport.com/community/noise/noise-in-your-area/arrivals-and-departure-maps).

<sup>53</sup> London City Airport (2020) Environment: Track aircraft in your area. Available at: [www.londoncityairport.com/corporate/Environment/Track-aircraft](https://www.londoncityairport.com/corporate/Environment/Track-aircraft).

<sup>54</sup> Department for Transport (2018) Beyond the horizon: The future of UK aviation - Making best use of existing runways. Available at: [www.gov.uk/government/publications/aviation-strategy-making-best-use-of-existing-runways](https://www.gov.uk/government/publications/aviation-strategy-making-best-use-of-existing-runways).

**5.22** Details of the reason(s) for the screening opinions reached for each policy are set out in **Table 5.1**. Many of the policies were assessed as being unlikely to lead to significant effects for the same reason(s), and these reasons are summarised following the table.

**5.23** Although the screening matrix presents the screening assessment for each policy individually, the conclusions take into account the potential impacts of other policies within the Proposed Submission Draft City Plan, as well as the potential impacts of other plans and projects.

Table 5.1: HRA Screening of the Proposed Submission Draft City Plan

**Contributing to a flourishing Society**

**Healthy and Inclusive City**

Policy	Potential for likely significant effects?	Comments
<b>Strategic Policy S1: Healthy and Inclusive City</b>	No	<p>The policy provides design requirements for new development in respect of health and accessibility.</p> <p>The policy also seeks to avoid adverse impacts on air quality, light pollution and contamination from new development and may therefore indirectly benefit biodiversity (although effects on the European sites within the scope of this HRA are unlikely due to their distance from the City and their qualifying features not being sensitive to light pollution).</p> <p>In addition, the policy seeks to protect and enhance existing health, educational, community and sport, play space and recreational facilities, as well as provide additional facilities. This directs development (of such facilities) away from European sites i.e. within the City boundary.</p> <p>The supporting policy text acknowledges the September 2020 changes to the Use Classes Order which mean that health and medical services could be converted into other uses within the same use class (Class E: Commercial, Business and Service) without planning permission. While the policy states that conditions may be attached to the planning permission for new public healthcare facilities to ensure their future retention, changes of use within the same use class are not 'development' so such conditions could be ineffective. Notwithstanding this, other uses within Class E: Commercial, Business and Service would be sufficiently distant from European sites that likely significant effects can be ruled out.</p>
<b>Policy HL1: Inclusive buildings and spaces</b>	No	The policy provides design requirements for new development in respect of accessibility for all and will not itself lead to development.
<b>Policy HL2: Air quality</b>	No	The policy seeks to avoid adverse impacts on air quality from new development and may therefore indirectly benefit biodiversity (although effects on the European sites within the scope of this HRA are unlikely due to their distance from the City) and will not itself lead to development.
<b>Policy HL3: Noise and light pollution</b>	No	The policy seeks to avoid noise and light pollution impacts from new development and may therefore indirectly benefit biodiversity by reducing the potential for disturbance of nearby habitats (although effects on the European sites within the scope of this HRA are unlikely due to their distance from the City and their qualifying features not being sensitive to light pollution) and will not itself lead to development.
<b>Policy HL4: Contaminated land and water quality</b>	No	The policy seeks to avoid adverse impacts of development on land or water quality and may therefore indirectly benefit biodiversity (e.g. by reducing the potential for pollution of downstream aquatic habitats, although effects on the European sites within the scope of this HRA are unlikely due to the absence of a pathway for effects) and will not itself lead to development.
<b>Policy HL5: Location and protection of social and community facilities</b>	No	The policy is mostly concerned with preserving existing social and community facilities and ensuring that new ones provide flexible space. To an extent, the policy actually promotes development of new facilities and these will be within the City boundary and thus directed away from European sites so not likely to have an effect on any European site.
<b>Policy HL6: Public toilets</b>	No	The policy is mostly concerned with increased provision of public toilets. These will be within the City boundary and thus directed away from European sites so not likely to have an effect on any European site.

Policy	Potential for likely significant effects?	Comments
<b>Policy HL7: Sport and recreation</b>	No	<p>This policy is mostly concerned with preserving existing sports and recreation facilities and encouraging provision of new permanent and temporary ones. These will be within the City boundary and thus directed away from European sites so not likely to have an effect on any European site.</p> <p>The supporting policy text acknowledges the September 2020 changes to the Use Classes Order which mean that existing gyms and other indoor recreational uses could be converted into other uses within the same use class (Class E: Commercial, Business and Service) without planning permission. While the policy states that specific planning conditions attached to a site may prevent this, changes of use within the same use class are not 'development' so such conditions could be ineffective. This could result in the loss of recreational facilities within the city and increased recreational pressure outside of the city. However, due to the significant distance between the city and the European sites, as well as the presence of alternative indoor recreational facilities in closer proximity to the city, this is unlikely. In addition, other uses within Class E: Commercial, Business and Service would be sufficiently distant from European sites that likely significant effects can be ruled out.</p>
<b>Policy HL8: Play areas and facilities</b>	No	<p>This policy is mostly concerned with preserving existing play facilities, encouraging provision of new ones and promoting opportunities for play within open spaces where new formal play areas are not possible. Since any new play areas will be within the City boundary, the policy has the effect of directing a potential source of disturbance away from European sites.</p>
<b>Policy HL9: Health Impact Assessment (HIA)</b>	No	<p>The policy sets requirements for new major development to undertake Health Impact Assessment and submit a Healthy City Planning checklist and will not itself lead to development.</p>

#### Safe and Secure City

Policy	Potential for likely effects?	Comments
<b>Strategic Policy S2: Safe and Secure City</b>	No	<p>The policy provides design requirements for new development in respect of security and safety and will not itself lead to development.</p>
<b>Policy SA1: Crowded Places</b>	No	<p>The policy provides design requirements for new major development in respect of security and safety and will not itself lead to development.</p>
<b>Policy SA2: Dispersal Routes</b>	No	<p>The 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.</p>
<b>Policy SA3: Designing in Security</b>	No	<p>The 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. It will not itself lead to development.</p>

#### Housing

Policy	Potential for likely effects?	Comments
<b>Strategic Policy S3: Housing</b>	No	<p>The policy provides design requirements for new residential development in respect of accessibility and affordable homes provision.</p>

Policy	Potential for likely effects?	Comments
		The policy also seeks to protect existing housing and provide additional housing in or near identified residential areas. Since the development is small in scale (2,482 residential units between 2019/20 and 2035/36) and will be within the City boundary and thus directed away from European sites, there is not likely to be an effect on any European site.
<b>Policy HS1: Location of New Housing</b>	No	The policy sets out criteria with regards to the location of new housing. The policy will not itself lead to development and the housing development will, in any case, be within the City boundary and thus directed away from European sites.
<b>Policy HS2: Loss of housing</b>	No	This policy sets out the circumstances in which existing housing will be protected. As such, it will not itself lead to new development.
<b>Policy HS3: Residential environment</b>	No	This policy will not lead to development but rather seeks to resist uses or proposed designs which would threaten existing residential amenity. This includes the avoidance of noise and air pollution impacts from new development affecting the amenity of existing residents and may therefore indirectly benefit biodiversity by reducing the potential for disturbance of nearby habitats (although effects on the European sites within the scope of this HRA are unlikely due to their distance from the City).
<b>Policy HS4: Housing quality standards</b>	No	The policy sets out housing design criteria with regards to space, security, and open and leisure space provision. The policy will not itself lead to housing development and since any open and leisure space provision will be within the City boundary, the policy has the effect of directing a potential source of disturbance away from European sites. In addition, the policy requires housing development to provide amenity space, and where possible outdoor space. These will be within the City boundary and could therefore limit the recreational pressure on European sites.
<b>Policy HS5: Short term residential letting</b>	No	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.
<b>Policy HS6: Student housing and hostels</b>	No	The policy sets out the circumstances in which student/ hostel accommodation will be permitted but does not provide for/ actively support such development. Supporting text explains that this is because the City is primarily a commercial area and Student housing may represent an opportunity lost for other housing needs in residential areas.
<b>Policy HS7: The Temples</b>	No	This policy seeks to maintain the current balance of residential to legal business accommodation between Fleet Street and the River Thames and will not itself lead to new development.
<b>Policy HS8: Older persons housing</b>	No	The policy supports and sets out how the City Corporation will provide sufficient housing for older people. Since the development will be within the City boundary and thus directed away from European sites, there is not likely to be an effect on any European site.
<b>Policy HS9: Self and custom housebuilding</b>	No	The policy sets out how self and custom build units within residential schemes will be encouraged. Since the development will be within the City boundary

Policy	Potential for likely effects?	Comments
		and thus directed away from European sites, there is not likely to be an effect on any European site.

**Supporting a thriving economy offices**

Policy	Potential for likely effects?	Comments
<b>Strategic Policy S4: Offices</b>	No	<p>The policy provides design requirements for new office development in respect of flexibility to adaption and provision for small and growing businesses.</p> <p>The policy also seeks to protect existing offices and provide additional offices in the City. Although the scale of office development provided for is significant (minimum of 2 million m<sup>2</sup> during 2016-2036), it will be within the City boundary and thus directed away from European sites. The supporting policy text acknowledges the September 2020 changes to the Use Classes Order which mean that offices could be converted into other uses within the same use class (Class E: Commercial, Business and Service) without planning permission. While the policy states that conditions may be attached to the planning permission for new office floorspace to ensure their future retention, changes of use within the same use class are not 'development' so such conditions could be ineffective. Notwithstanding this, other uses within Class E: Commercial, Business and Service would be sufficiently distant from European sites that likely significant effects can be ruled out. There is not, therefore, likely to be an effect on any European site.</p>
<b>Policy OF1: Office Development</b>	No	The policy provides design requirements for new office development in respect of flexibility to adaption and provision for micro, small and medium sized enterprises, and will not itself lead to development.
<b>Policy OF2: Protection of Existing Office Floorspace</b>	No	The policy sets out circumstances in which loss of office accommodation would be inappropriate and will not itself lead to development.
<b>Policy OF3: Temporary 'Meanwhile' Use of Offices</b>	No	The policy sets out circumstances in which alternative, 'meanwhile' uses for vacant commercial, business and service buildings and sites would be permitted. While such uses are not actively supported by the policy text, the supporting text makes clear that 'meanwhile' uses are supported to maintain vitality and vibrancy. Since this temporary development will be within the City boundary and thus directed away from European sites, there is not likely to be an effect on any European site.

**Supporting a thriving economy retailing**

Policy	Potential for likely effects?	Comments
<b>Strategic Policy S5: Retailing</b>	No	<p>The policy provides design requirements for new retail development in respect of location and mix of uses.</p> <p>The policy also seeks to provide additional retail development in the City. Since the development or other development within the same use class (Class E: Commercial, Business and Service) will be within the City boundary and</p>

Policy	Potential for likely effects?	Comments
		thus directed away from European sites, there is not likely to be an effect on any European site.
<b>Policy RE1: Principal Shopping Centres</b>	No	This policy states how the development of the Principal Shopping Centres will be promoted e.g. by resisting loss of retail frontage. As such, it will not itself lead to development.
<b>Policy RE2: Retail Links</b>	No	This policy is mostly concerned with preserving existing retail frontage and floorspace and encouraging provision of new retail development. Since any new retail development or other development within the same use class (Class E: Commercial, Business and Service) will be within the City boundary, the policy has the effect of directing development away from European sites.
<b>Policy RE3: Ground floor retail provision elsewhere in the City</b>	No	The policy sets out circumstances in which ground floor retail uses would be permitted. Since any new retail development or other development within the same use class (Class E: Commercial, Business and Service) will be within the City boundary, the policy has the effect of directing development away from European sites.
<b>Policy RE4: Specialist Retail Uses</b>	No	This policy is mostly concerned with preserving existing specialist retail uses and premises that are historically and culturally significant to the City and will not itself lead to development.
<b>Policy RE5: Markets</b>	No	The policy sets out circumstances in which markets and temporary retail pop-ups would be permitted. Since any new markets and temporary retail pop-ups will be within the City boundary, the policy has the effect of directing a source of potential disturbance away from European sites.

**Culture Visitors and the night time economy**

Policy	Potential for likely effects?	Comments
<b>Strategic Policy S6: Culture, Visitors and the Night-Time Economy</b>	No	This policy is mostly concerned with preserving and enhancing existing and encouraging provision of cultural and night-time use developments and opportunities. Since any new cultural and night-time use developments will be within the City boundary, the policy has the effect of directing development away from European sites.
<b>Policy CV1: Protection of Existing Visitor, Arts and Cultural Facilities</b>	No	The policy sets out the circumstances in which loss of existing arts and cultural facilities will be acceptable and will not itself lead to development.
<b>Policy CV2: Provision of Visitor Facilities</b>	No	This policy is mostly concerned with making provision of visitor facilities and therefore directs development (of visitor facilities) away from European sites i.e. within the City boundary.
<b>Policy CV3: Hotels</b>	No	The policy sets out circumstances in which hotel development would be permitted. Since any new hotel development will be within the City boundary, the policy has the effect of directing development away from European sites.
<b>Policy CV4: Evening and Night-Time Economy</b>	No	The policy sets out circumstances in which evening and night-time use development would be permitted, including avoidance of noise, disturbance and air quality issues. The policy may therefore indirectly benefit biodiversity by reducing the potential for disturbance of nearby habitats (although effects

Policy	Potential for likely effects?	Comments
		on the European sites within the scope of this HRA are unlikely due to their distance from the City). It also directs development of evening and night-time uses (or other development within the same use class as Food and Drink that is not sui generis) away from European sites i.e. within the City boundary.
<b>Policy CV5: Public Art</b>	No	The policy sets out the means by which public art and objects of cultural significance will be protected and maintained and new artwork provided. Since any new public art will be within the City boundary, the policy has the effect of directing a source of potential disturbance away from European sites.

#### Smart Infrastructure and utilities

Policy	Potential for likely effects?	Comments
<b>Strategic Policy S7: Smart Infrastructure and Utilities</b>	No	The policy sets out how development should provide infrastructure and will not itself lead to development.
<b>Policy IN1: Infrastructure provision and connection</b>	No	The 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. The policy may therefore indirectly benefit biodiversity by reducing the potential for intense energy consumption (contributing to climate change and air pollution), water use and water pollution affecting nearby habitats (although effects on the European sites within the scope of this HRA are unlikely due to their distance from the City and absence of hydrological connections) and will not itself lead to development.
<b>Policy IN2: Infrastructure Capacity</b>	No	The policy sets out how development should provide infrastructure and will not itself lead to development.
<b>Policy IN3: Pipe Subways</b>	No	The policy sets out how development should provide infrastructure and will not itself lead to development.

#### Shape outstanding environments Design

Policy	Potential for likely effects?	Comments
<b>Strategic Policy S8: Design</b>	No	The policy sets out design requirements for development, including addressing climate change, limiting light pollution and providing green infrastructure. The policy may therefore indirectly benefit biodiversity by providing habitats and reducing the potential for climate change and light pollution impacts affecting nearby habitats (although effects on the European sites within the scope of this HRA are unlikely due to their distance from the City and their qualifying features not being sensitive to light pollution) and will not itself lead to development.
<b>Policy DE1: Sustainability Standards</b>	No	The policy sets out requirements for development regarding sustainability, including limiting pollution and energy and water use. The policy may therefore indirectly benefit biodiversity by reducing the potential for climate change, water quantity and quality and air pollution impacts affecting nearby habitats (although effects on the European sites within the scope of this HRA are

Policy	Potential for likely effects?	Comments
		unlikely due to their distance from the City and absence of hydrological connections) and will not itself lead to development.
<b>Policy DE2: New Development</b>	No	The policy sets out design requirements for new development, including conserving the built environment and providing urban greening, which may therefore indirectly benefit biodiversity (although effects on the European sites within the scope of this HRA are unlikely due to their distance from the City) and will not itself lead to development.
<b>Policy DE3: Public Realm</b>	No	The policy sets out design requirements for the public realm, including conserving the built environment, providing green corridors and incorporating sustainable drainage, which may therefore indirectly benefit biodiversity by providing habitats and reducing the potential for water quantity and quality impacts affecting nearby habitats (although effects on the European sites within the scope of this HRA are unlikely due to their distance from the City and absence of hydrological connections) and will not itself lead to development.
<b>Policy DE4: Pedestrian permeability</b>	No	The policy sets out design requirements for enhanced pedestrian permeability, including maintaining and enhancing the City's characteristic network of assessable routes, and will not itself lead to development.
<b>Policy DE5: Terraces and Viewing Galleries</b>	No	The policy sets out design requirements for roof terraces and viewing galleries, including maintaining and enhancing the built character of the City and maximising urban greening and green roofs, which may therefore indirectly benefit biodiversity (although effects on the European sites within the scope of this HRA are unlikely due to their distance from the City) and will not itself lead to development.
<b>Policy DE6: Shopfronts</b>	No	The policy sets out design requirements for shopfronts, including maintaining the built character of the City and preventing light spillage, which may therefore indirectly benefit biodiversity by reducing the potential for light pollution impacts affecting nearby habitats (although effects on the European sites within the scope of this HRA are unlikely due to their distance from the City and their qualifying features not being sensitive to light pollution) and will not itself lead to development.
<b>Policy DE7: Advertisements</b>	No	The policy sets out design requirements for advertisements, including maintaining the character of the City, and will not itself lead to development.
<b>Policy DE8: Daylight and sunlight</b>	No	The policy sets out design requirements for developments with regards to daylight and sunlight and will not itself lead to development. In addition, biodiversity benefits may result for open space which might otherwise be shaded by new development (although effects on the European sites within the scope of this HRA are unlikely due to their distance from the City).
<b>Policy DE9: Lighting</b>	No	The policy sets out design requirements for developments with regards to lighting, including limiting lighting impacts on heritage assets and biodiversity (although effects on the European sites within the scope of this HRA are unlikely due to their distance from the City and their qualifying features not being sensitive to light pollution) and will not itself lead to development.

**Vehicular transport and servicing**

Policy	Potential for likely effects?	Comments
<b>Strategic Policy S9: Vehicular Transport and Servicing</b>	No	This policy is mostly concerned with preserving and enhancing existing and providing additional transport infrastructure, including reducing environmental impacts and air pollution which may therefore indirectly benefit biodiversity by reducing the potential for pollution and other environmental impacts affecting nearby habitats (although effects on the European sites within the scope of this HRA are unlikely due to their distance from the City). Since any transport infrastructure development will be within the City boundary, the policy has the effect of directing a potential source of disturbance away from European sites.
<b>Policy VT1: The impacts of development on transport</b>	No	This policy seeks to reduce the construction and operational impacts of developments on the transport network and will not itself lead to development.
<b>Policy VT2: Freight and Servicing</b>	No	This policy sets standards with regard to freight and servicing, including seeking to reduce congestion, providing electric vehicle fast charging points and utilising zero emissions transport methods. This may therefore indirectly benefit biodiversity by reducing the potential for air pollution impacts affecting nearby habitats (although effects on the European sites within the scope of this HRA are unlikely due to their distance from the City) and will not itself lead to development.
<b>Policy VT3: Vehicle Parking</b>	No	This policy seeks to restrict car parking, provide charging facilities for electric vehicles and provide for taxi ranks at key locations and may therefore indirectly benefit the natural environment by facilitating a modal shift away from the private car, reducing the potential for air pollution impacts affecting nearby habitats (although effects on the European sites within the scope of this HRA are unlikely due to their distance from the City) and will not itself lead to development.
<b>Policy VT4: River Transport</b>	No	<p>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. As such, the policy may indirectly benefit the natural environment by facilitating a modal shift away from HGVs, reducing the potential for air pollution impacts affecting nearby habitats (although effects on the European sites within the scope of this HRA are unlikely due to their distance from the City) and will not itself lead to development.</p> <p>Although this policy could, in theory, indirectly lead to increased use of navigable water courses connected to the River Thames for transport of waste and construction materials, with the potential for pollution or disturbance of sensitive habitats or species, in practice the River Lee and Lee Navigation canal, which pass alongside the Lee Valley SPA and Ramsar site, are unlikely to impact the site via water pollution as National Planning Practice Guidance aims to prevent water pollution and activities that have the potential to cause water pollution require environmental permits.</p>
<b>Policy VT5: Aviation Landing Facilities</b>	No	This policy will prevent the development of heliports in the City and restrict helipads to emergency or security uses where the need cannot be met elsewhere. Since any helipad development will be within the City boundary, the policy has the effect of directing a potential source of disturbance away from European sites.

**Active travel and healthy streets**

Policy	Potential for likely effects?	Comments
<b>Strategic Policy S10: Active Travel and Healthy Streets</b>	No	This policy seeks to improve transport in the City to improve accessibility and encourage active travel. The policy may therefore indirectly benefit the natural environment by facilitating a modal shift away from the private car, reducing the potential for air pollution impacts affecting nearby habitats (although effects on the European sites within the scope of this HRA are unlikely due to their distance from the City) and will not itself lead to development.
<b>Policy AT1: Pedestrian Movement</b>	No	This policy seeks to facilitate pedestrian movement around and through new developments, including by maintaining the character of the City and safeguarding and reinstating historic routes. The policy may therefore indirectly benefit the natural environment by facilitating a modal shift away from the private car, reducing the potential for air pollution impacts affecting nearby habitats (although effects on the European sites within the scope of this HRA are unlikely due to their distance from the City) and will not itself lead to development.
<b>Policy AT2: Active Travel including Cycling</b>	No	This policy requires development to promote and encourage active travel, including cycling. The policy may therefore indirectly benefit the natural environment by facilitating a modal shift away from the private car, reducing the potential for air pollution impacts affecting nearby habitats (although effects on the European sites within the scope of this HRA are unlikely due to their distance from the City) and will not itself lead to development.
<b>Policy AT3: Cycle Parking</b>	No	This policy seeks to increase cycle parking and may therefore indirectly benefit the natural environment by facilitating a modal shift away from the private car, reducing the potential for air pollution impacts affecting nearby habitats (although effects on the European sites within the scope of this HRA are unlikely due to their distance from the City) and will not itself lead to development.

#### Historic Environment

Policy	Potential for likely effects?	Comments
<b>Strategic Policy S11: Historic Environment</b>	No	The policy seeks to conserve the City's heritage assets and their setting and will not itself lead to development.
<b>Policy HE1: Managing Change to Heritage Assets</b>	No	The policy seeks to conserve and enhance the City's heritage assets and their setting and will not itself lead to development.
<b>Policy HE2: Ancient Monuments and Archaeology</b>	No	The policy seeks to conserve and enhance the City's archaeology and ancient monuments and will not itself lead to development.
<b>Policy HE3: Setting of the Tower of London World Heritage Site</b>	No	The policy seeks to conserve and enhance the Tower of London World Heritage Site and its setting and will not itself lead to development.

#### Tall buildings and Protected Views

Policy	Potential for likely effects?	Comments
Strategic Policy S12: Tall Buildings	No	The policy provides design requirements for the developments of tall buildings in respect of the City's character and heritage, and with regard to assisting in the dispersal of air pollutants. The policy will not itself lead to development, albeit that it will affect the scale and form of development but may indirectly benefit biodiversity by reducing the potential for pollution and other environmental impacts (e.g. shading) affecting nearby habitats (although effects on the European sites within the scope of this HRA are unlikely due to their distance from the City).
Strategic Policy S13: Protected Views	No	The policy seeks to conserve protected views and will not itself lead to development.

#### Open spaces and green infrastructure

Policy	Potential for likely effects?	Comments
<b>Strategic Policy S14: Open Spaces and Green Infrastructure</b>	No	This policy is mostly concerned with preserving existing and providing new open space and green infrastructure, including using planting and habitat creation to enhance biodiversity, combat the impacts of climate change and improve air quality (although effects on the European sites within the scope of this HRA are unlikely due to their distance from the City), and seeks to increase public access to open spaces. Since any new open space will be within the City boundary, and the policy seeks to increase public access to open space, the policy has the effect of directing a potential source of disturbance away from European sites.
<b>Policy OS1: Protection and provision of open spaces</b>	No	This policy is mostly concerned with preserving existing and providing new open spaces, including that of historic interest, and seeks to increase public access to open spaces. Since any new open space will be within the City boundary, and the policy seeks to increase public access to open space, the policy has the effect of directing a potential source of disturbance away from European sites.
<b>Policy OS2: City Greening</b>	No	This policy sets requirements for urban greening to be delivered as part of new development, including the installation of biodiverse extensive or intensive features, thereby providing benefits for biodiversity (although effects on the European sites within the scope of this HRA are unlikely due to their distance from the City) and will not itself lead to development.
<b>Policy OS3: Biodiversity</b>	No	This policy sets requirements for developments to incorporate features to enhance biodiversity (although effects on the European sites within the scope of this HRA are unlikely due to their distance from the City) and will not itself lead to development.
<b>Policy OS4: Trees</b>	No	This policy sets requirements for the protection of existing trees and the planting of additional trees, thereby providing benefits for biodiversity (although effects on the European sites within the scope of this HRA are unlikely due to their distance from the City) and will not itself lead to development.

#### Climate resilience and flood risk

Policy	Potential for likely effects?	Comments
<b>Strategic Policy S15: Climate Resilience and Flood Risk</b>	No	The policy sets out design requirements for development to adapt to climate change and flood risk. As such it is designed to safeguard people and the built environment and will not itself lead to development.
<b>Policy CR1: Overheating and Urban Heat Island Effect</b>	No	The policy sets out design requirements for development to prevent overheating and urban heat island effects, including through urban greening. As such it is designed to safeguard people and the built environment but may also provide benefits for biodiversity through habitat creation (although effects on the European sites within the scope of this HRA are unlikely due to their distance from the City) and will not itself lead to development.
<b>Policy CR2: Flood Risk</b>	No	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.
<b>Policy CR3: Sustainable drainage systems (SuDS)</b>	No	The policy sets out design requirements for development to incorporate sustainable drainage systems, including by protecting heritage assets, enhancing biodiversity, and providing multifunctional open spaces. As such, it is designed to safeguard people and the built environment, as well as enhance biodiversity. Since any new open space will be within the City boundary, and the policy seeks to increase public access to open space, the policy has the effect of directing a potential source of disturbance away from European sites.
<b>Policy CR4: Flood protection and flood defences</b>	No	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.

**Circular economy and waste**

Policy	Potential for likely effects?	Comments
<b>Strategic Policy S16: Circular Economy and Waste</b>	No	<p>The policy sets out how the City Corporation will promote circular economy principles and plan for capacity to manage the City's residual waste. Although it supports the principle of identifying suitable new waste management facilities within and beyond the City's boundaries, it will not directly lead to development. The potential effects of the development of waste management facilities are more appropriately assessed via HRA of more detailed and spatially specific policies in the Proposed Submission Draft City Plan (see HRA of <b>Policy CEW3: New waste management sites</b> below) and other Local Plans that provide for such development.</p> <p>The policy does contain one specific proposal - to safeguard Walbrook Wharf as a waste site and wharf suitable for the river transport of waste. The distance between this location on the River Thames within the City and the scoped-in European sites and the lack of hydrological connectivity between them means that likely significant effects can be ruled out. Any potential effects arising from the transport of waste via rivers is considered under <b>Policy VT4: River Transport</b>.</p>
<b>Policy CE1: Zero Waste City</b>	No	The policy sets out design requirements with regard to promoting circular economy principles, which may indirectly benefit for biodiversity through reducing the impacts of pollution and waste disposal upon nearby habitats (although effects on the European sites within the scope of this HRA are

Policy	Potential for likely effects?	Comments
		unlikely due to their distance from the City) and will not itself lead to development.
<b>Policy CE2: Sustainable Waste Transport</b>	No	This policy sets out how the environmental impact of waste transport will be minimised, which may indirectly provide benefits for biodiversity through reducing the impacts of pollution upon nearby habitats (although effects on the European sites within the scope of this HRA are unlikely due to their distance from the City) and will not itself lead to development.
<b>Policy CE3: New waste management sites</b>	No	This policy sets out criteria for the development of new waste management, handling and transfer sites within the City. Any such facilities would be sufficiently remote from the European sites within the scope of this assessment that it would not be likely to have any effect upon them.

### Key areas of change

#### Thames Policy Area

Policy	Potential for likely effects?	Comments
Strategic Policy S17: Thames Policy Area	No	<p>The policy seeks to maintain and enhance the character of the riverside area and its functional uses for transport and recreation, including protecting views, improving access, safeguarding heritage assets and biodiversity value, supporting sustainable lighting delivery, and resisting inappropriate riverside development and permanent moorings.</p> <p>The policy also safeguards sites for construction of the Thames Tideway Tunnel and adds further support to the use of the Thames for waterborne freight and waste transport. These may have long term, indirect environmental benefits by facilitating a modal shift away from the private car, reducing the potential for air pollution impacts affecting nearby habitats (although they are not likely to impact the European sites within the scope of the study due to their distance from the City boundary and the lack of pathways by which effects could occur).</p> <p>In addition, the policy encourages the delivery of a mix of commercial and cultural uses and promoting office-led commercial development. Any new development, including other non-office development within the same use class (Class E: Commercial, Business and Service), will be within the City boundary and so it is not likely to impact the European sites within the scope of the study due to their distance from the City boundary and the lack of pathways by which effects could occur.</p> <p>The policy also seeks to increase public access to open space within the City which will help to direct outdoor recreation away from European sites.</p>

#### Blackfriars key area of change

Policy	Potential for likely effects?	Comments
Strategic Policy S18: Blackfriars	No	The policy seeks to maintain and enhance the character of Blackfriars, including enhancing access and the public realm and identifying opportunities for urban greening and pollution reduction measures, which may indirectly provide benefits for biodiversity through habitat creation and reducing the impacts of air pollution upon nearby habitats (although effects on the European sites within the scope of this HRA are unlikely due to their distance from the City).

Policy	Potential for likely effects?	Comments
		<p>The policy also safeguards sites for construction of the Thames Tideway Tunnel. This will have long term, indirect benefits for water quality and aquatic ecology in the River Thames although these are not likely to impact the European sites within the scope of the study due to their distance from the City boundary and the lack of hydrological pathways by which effects could occur.</p> <p>In addition, the policy encourages the redevelopment or refurbishment of buildings for office and commercial use. Any new development, including other non-office development within the same use class (Class E: Commercial, Business and Service), will be within the City boundary and so it is not likely to impact the European sites within the scope of the study due to their distance from the City boundary and the lack of pathways by which effects could occur.</p> <p>The policy also seeks to increase public access to open space within the City which will help to direct outdoor recreation away from European sites.</p>

**Aldgate and Tower key area of change**

Policy	Potential for likely effects?	Comments
Strategic Policy S20: Aldgate and Tower	No	<p>The policy seeks to promote the Aldgate and Tower area as a mixed-use area, including encouraging pedestrian access, improving levels of air and noise pollution, and providing urban greening, which may also indirectly benefit biodiversity through habitat creation and the reduction of air pollution impacts upon nearby habitats (although effects on the European sites within the scope of this HRA are unlikely due to their distance from the City).</p> <p>In addition, the policy encourages the provision of open spaces and play space and the development of offices, hotels and the redevelopment of a residential area. Any new development, including other non-office development within the same use class (Class E: Commercial, Business and Service), will be within the City boundary and so it is not likely to impact the European sites within the scope of the study due to their distance from the City boundary and the lack of pathways by which effects could occur.</p> <p>The policy also seeks to increase public access to open space within the City which will help to direct outdoor recreation away from European sites.</p>

**City Cluster key area of change**

Policy	Potential for likely effects?	Comments
Strategic Policy S21: City Cluster	No	<p>The policy seeks to accommodate growth in office floorspace and employment, together with complementary land uses, transport, and public realm and security enhancements in the area, including delivering buildings that make a positive contribution to the built and historic environment, and enhancing the public realm and pedestrian access. It also seeks to increase urban greening, which may enhance biodiversity through habitat creation (although effects on the European sites within the scope of this HRA are unlikely due to their distance from the City).</p> <p>Any new development, including other non-office development within the same use class (Class E: Commercial, Business and Service), will be within the City boundary and so it is not likely to impact the European sites within the scope of the study due to their distance from the City boundary and the lack of pathways by which effects could occur.</p>

Policy	Potential for likely effects?	Comments
		The policy also seeks to increase public access to open space within the City which will help to direct outdoor recreation away from European sites.

**Fleet Street and Ludgate key area of change**

Policy	Potential for likely effects?	Comments
Strategic Policy S22: Fleet Street and Ludgate Hill	No	<p>The policy seeks to promote the character and function of the area as a centre for judicial and related business, a key processional route and a Principal Shopping Centre, including by enhancing access and the historic environment and by delivering additional greening, which may also indirectly benefit biodiversity through habitat creation (although effects on the European sites within the scope of this HRA are unlikely due to their distance from the City).</p> <p>In addition, the policy encourages the development of court facilities, a police station, and residential and retail developments. Any new development, including other non-retail development within the same use class (Class E: Commercial, Business and Service), will be within the City boundary and so it is not likely to impact the European sites within the scope of the study due to their distance from the City boundary and the lack of pathways by which effects could occur.</p> <p>The policy also seeks to increase public access to open space within the City which will help to direct outdoor recreation away from European sites.</p>

**Smithfield and Barbican Key area of change**

Policy	Potential for likely effects?	Comments
<b>Strategic Policy S23: Smithfield and Barbican Key Area of Change</b>	No	The policy seeks to improve the Smithfield and Barbican area, including by implementing the Culture Mile initiative, improving pedestrian access, enhancing community facilities and open space preserving noise abatement, minimising air pollution and improving air quality, which may also indirectly benefit biodiversity through minimising air pollution and disturbance impacts upon nearby habitats (although effects on the European sites within the scope of this HRA are unlikely due to their distance from the City) and will not itself lead to development.
<b>Strategic Policy S24: Culture Mile Implementation</b>	No	<p>The policy seeks to promote and protect the Culture Mile as the City's main cultural centre and world class cultural destination, including by supporting development to benefit local communities, relocating the Museum of London to Smithfield, developing a new Centre for Music, and developing additional retail and leisure uses.</p> <p>Any new development, including other non-retail and leisure development within the same use class (Class E: Commercial, Business and Service), will be within the City boundary and so it is not likely to impact the European sites within the scope of the study due to their distance from the City boundary and the lack of pathways by which effects could occur.</p>

Policy	Potential for likely effects?	Comments
		The policy also seeks to increase public access to open space within the City which will help to direct outdoor recreation away from European sites.
<b>Policy SB1: Culture Mile Impacts</b>	No	The policy seeks to protect the amenity of residents and occupiers, the integrity of historic and listed buildings and structures and the flow of traffic and access to premises for service vehicles affected by Culture Mile, including by making consideration of noise-generating uses when permitting development, requiring the installation of noise mitigation measures in developments, and requiring development and cultural activities to preserve and enhance the existing historic environment. Therefore, the policy may also indirectly benefit biodiversity through minimising noise disturbance impacts upon nearby habitats (although effects on the European sites within the scope of this HRA are unlikely due to their distance from the City) and will not itself lead to development.
<b>Strategic Policy S25: Smithfield</b>	No	<p>The policy seeks to protect and enhance the distinctive mixed-use and historic character of Smithfield and seeks to re-use buildings, which will not itself lead to development. In addition, the policy seeks to reduce freight and vehicular movements, which may also indirectly benefit biodiversity through minimising air pollution impacts upon nearby habitats (although effects on the European sites within the scope of this HRA are unlikely due to their distance from the City).</p> <p>The policy also supports the proposed relocation of the Museum of London to Smithfield, and any such development would therefore be within the City boundary and so it is not likely to impact the European sites within the scope of the study due to their distance from the City boundary and the lack of pathways by which effects could occur. As a consequence, Smithfield Wholesale Meat Market will need to be relocated elsewhere but that process is taking place separately from the City's Local Plan (hence is not within the scope of this assessment of the effects of the City Plan) and is at a very early pre-planning application stage (hence does not need to be considered in the in-combination assessment).</p>

**Liverpool Street key area of change**

Policy	Potential for likely effects?	Comments
Strategic Policy S26: Liverpool Street	No	<p>The policy seeks to enhance the Liverpool Street area, including by enhancing the built environment and encouraging the development of office space, as well as increasing urban greening and green space, which may benefit biodiversity through habitat creation (although effects on the European sites within the scope of this HRA are unlikely due to their distance from the City).</p> <p>Any new development, including other non-office development within the same use class (Class E: Commercial, Business and Service), will be within the City boundary and so it is not likely to impact the European sites within the scope of the study due to</p>

Policy	Potential for likely effects?	Comments
		<p>their distance from the City boundary and the lack of pathways by which effects could occur.</p> <p>The policy also seeks to increase public access to open space within the City which will help to direct outdoor recreation away from European sites.</p>

**Implementation planning obligations**

Policy	Potential for likely effects?	Comments
Strategic Policy S27: Planning Contributions	No	The 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.
Policy PC1: Viability Assessments	No	The 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.

### Significant effects likely

**5.24** None of the policies in the Proposed Submission Draft City Plan are considered likely to result in significant effects on the European sites within the scope of the study.

### Significant effects unlikely

**5.25** Significant effects are considered unlikely in relation to all of the Proposed Submission Draft City Plan policies. Many of the policies will not result directly in development, rather they set out criteria for development that will be determined under other, more specific policies, which have been screened separately for their potential to affect European sites.

**5.26** For the policies that will result directly in development, likely significant effects can be ruled out for combinations of the following reasons:

- All development provided for by the Proposed Submission Draft City Plan is within the City boundary and hence remote from European sites.
- Mobile qualifying species for which the scoped-in European sites are designated (stag beetle; over-wintering birds) do not rely on non-qualifying habitat ('functionally linked land') within the City boundary that could be lost to development.
- The scoped-in European sites are not hydrologically connected to the plan area.
- The potential for the plan to result in increases in road traffic and associated air pollution at the scoped-in European sites is judged to be negligible for the following reasons:
  - The main types of development provided for by the plan are large scale office development and small-scale residential development.
  - All development is required to be car-free except for designated Blue Badge space or in exceptional circumstances.
  - The plan area is exceptionally well-served by public transport, as well as subject to congestion-charging.
- Any increase in public access and disturbance at the scoped-in European sites is judged to be negligible due to the small scale of residential development proposed, together with the distance between the City and the scoped-in European sites<sup>55</sup>. Those European sites are judged unlikely to create a significant draw for tourists or business people using the hotels provided for by the

Proposed Submission Draft City Plan due to a combination of the distance of the European sites from the City, the likely short duration of most visits, and the presence of higher profile visitor attractions within and closer to the City.

### In-combination effects

**5.27** The review of other plans or projects did not identify any potential likely significant effects on European sites that could arise in-combination with the effects of the Proposed Submission Draft City Plan.

<sup>55</sup> Natural England (2019) Emerging strategic approach relating to the Epping Forest Special Area of Conservation (SAC) Mitigation Strategy. Interim advice following feedback from London Borough's and Greater London Authority.

Available at: [www.redbridge.gov.uk/media/6586/epping-forest-interim-advice-letter-march-2019-final.pdf](http://www.redbridge.gov.uk/media/6586/epping-forest-interim-advice-letter-march-2019-final.pdf).

## **Chapter 6**

# **Conclusions and recommendations**

**6.1** This HRA Screening identified the European sites with the potential to be affected by the City Plan, being Epping Forest SAC and Lee Valley SPA and Ramsar site, and the factors contributing to their integrity. It examined the policies in the Proposed Submission Draft City Plan and how these might interact with these European sites when the City Plan is implemented. It also considered other plans and projects that might give rise to in-combination effects with the Proposed Submission Draft City Plan.

**6.2** All of the policies within the Proposed Submission Draft City Plan were identified as being unlikely to have a significant effect on relevant European sites. Many of the policies will not result directly in development. For the policies that will result directly in development, likely significant effects were ruled out for the reasons set out in the preceding chapter.

**6.3** Taking all the above factors into account, we conclude that the City of London Proposed Submission Draft Local Plan 'City Plan 2036' is not likely to have a significant effect on any European site, alone or in combination with other plans or projects. There is therefore no need to proceed to the Appropriate Assessment stage of HRA.

### **Recommendations**

**6.4** Since no likely significant effects on European sites have been identified, no recommendations for changes to the Proposed Submission Draft City Plan or for further HRA work have been made.

**6.5** It is recommended that in accordance with the Habitats Regulations, the formal opinion of Natural England on the approach and conclusions of this HRA Screening Report is sought. In line with good practice, it is also recommended that the views of the Environment Agency be sought.

LUC

March 2021

## **Appendix A**

### **Plans with the potential for in-combination Effects**

Hackney Local Plan 2033 (LP33)
<p><b>Status</b></p> <p>The Hackney Local Plan 2033 was adopted in July 2020.</p> <p><b>Housing Provision</b></p> <p>The Local Plan seeks to deliver 26,250 new homes between 2018 and 2033, and makes provision for a minimum of 1,330 new homes each year. The majority of this housing growth is planned to take place in and around Shoreditch (7,000 homes), in the north of the Borough at Woodberry Down/Stamford Hill (3,000 homes), around Dalston (2,000 homes) and Hackney Central (3,000 homes), and along 'Enhanced Corridors' within the Borough.</p> <p><b>Employment Land Provision</b></p> <p>The Local Plan seeks to deliver a minimum of 118,000sqm of new office floorspace. This new employment floorspace (B class) will be permitted in Locally Significant Industrial Sites (LSISs), Priority Office Areas (POAs), Priority Industrial Areas (PIAs), Central Activities Zone (CAZ), and designated town centres.</p> <p><b>HRA</b></p> <p>The October 2018 HRA of the Hackney Local Plan 2033 concluded that the proposed policies could be 'screened out' as being unlikely to lead to significant adverse effects on European sites, and do not need to be taken forward to the next stage of Appropriate Assessment. The 2019 HRA of the main modifications to the Local Plan concluded there would be no change to the findings of the 2018 HRA.</p> <p><b>Therefore, there are no likely in-combination effects of the adopted Hackney Local Plan 2033 with the City of London Local Plan.</b></p>
Islington Local Plan: Core Strategy (February 2011); Development Management Local Plan (June 2013); Site Allocations Local Plan (June 2013)
<p><b>Islington Local Plan Proposed Submission: Strategic and Development Management Policies, Site Allocations and the Bunhill and Clerkenwell Area Action Plan (September 2019).</b></p> <p><b>Status</b></p> <p>The adopted Local Plan comprises the Core Strategy, Development Management Local Plan and the Site Allocations Local Plan. The Core Strategy was adopted in February 2011. The Development Management Local Plan was adopted in June 2013. The Site Allocations Local Plan was adopted in June 2013.</p> <p>The Council is currently preparing a new Local Plan for Islington. Consultation on the Islington Local Plan Proposed Submission ended in October 2019. The Islington Local Plan was submitted to the Secretary of State for examination in public in February 2020. Once adopted, the new Local Plan will cover the period 2020-2035.</p> <p><b>Housing Provision</b></p> <p>The adopted Core Strategy aims to provide 1,160 new homes per year from 2007-2017, which was subsequently replaced by a new target of 1,170 homes per year from 2011-2021.</p> <p>As part of the overall London Plan housing target, Islington's Local Plan sets out that it will provide 17,400 residential units by 2025. Key areas for this housing delivery have been allocated in Archway (549 dwellings), Finsbury Park (692 dwellings), Nag's head and Upper Holloway Road (280 dwellings), Highbury Corner and Holloway Road (888 dwellings), Angel and Upper Street (335 dwellings), King's Cross (255 dwellings), Bunhill and Clerkenwell (3,161 dwellings).</p> <p>The Islington Local Plan Proposed Submission document sets out the Council's aim to meet and exceed the borough's housing target of 7,750 new homes by 2028/29, which equates to an annualised target of 775 homes per annum.</p> <p><b>Employment Land Provision</b></p> <p>The adopted Core Strategy aims to provide 35,000–45,000 new jobs by 2027. There will be a focus on maintaining levels of employment by protecting the amount of employment floorspace. It is expected that just over 50% of jobs will be provided by B-use floorspace by the end of the plan period.</p> <p>It is set out that increases in B-use floorspace in the Central Activities Zone (CAZ) will account for around 75% of total employment growth. Key areas identified in the spatial strategy for growth in B-use floorspace are Bunhill and Clerkenwell (70%) and King's Cross (15%).</p> <p>The Islington Local Plan Proposed Submission document aims to meet the expected 50,500 additional jobs by 2036 within the borough, by delivering new business floorspace focused in the borough's Central Activities Zones (CAZs), Bunhill and Clerkenwell AAP area, the CAZ fringe Spatial Strategy areas of Angel and Upper Street, Kings Cross, and Pentonville Road.</p> <p><b>HRA</b></p> <p>The October 2011 Appropriate Assessment of Islington's Local Development Framework: Screening Assessment Update states that the Core Strategy policies in the Local Plan are not expected to have significant adverse effects on European sites.</p>

The Sustainability Appraisal of the Islington Site Allocations Local Plan (June 2013) states that there could be negative impacts caused by redevelopment in relation to protecting biodiversity and key habitats within the borough. However, it is suggested that there are sufficient mitigating measures in place within the Core Strategy Local Plan to ensure these impacts are minimised. As such, the Local Plan is unlikely to lead to significant adverse effects on European sites.

The 2019 HRA Screening of Islington's Local Plan concluded that the effects of the Local Plan policies and allocations are not considered to be significant, either alone or in combination with other plans.

**Therefore, there are no likely in-combination effects of the adopted Islington Local Plan or the Islington Local Plan Proposed Submission with the City of London Local Plan.**

**Lambeth Local Plan (September 2015)**

**Draft Revised Lambeth Local Plan Proposed Submission Version (January 2020)**

**Status**

The Lambeth Local Plan 2015 was adopted in September 2015.

The Council is currently undertaking a partial review of the Lambeth Local Plan 2015 and has introduced some proposed new areas of policy, some proposed revisions to policy and some proposed changes to policy designations within the Draft Revised Lambeth Local Plan Proposed Submission Version 2020 (DRLLP PSV 2020). This was published for public consultation in January 2020 and submitted for examination in May 2020.

**Housing Provision**

Lambeth's target for the 15-year Local Plan period is 17,925 new homes. The adopted Local Plan sets out to maximise the supply of additional homes in the borough to meet and exceed the annual housing target for Lambeth, which is set at 1,195 new homes a year.

Brixton is highlighted as an area that has significant potential for residential development. Waterloo and Vauxhall are also suggested as areas where new housing will be provided.

The Draft Revised Lambeth Local Plan Proposed Submission Version sets out the Council's aim to maximise the supply of housing in the borough and meet and exceed Lambeth's housing requirement of 13,350 homes for the ten-year period of 2019/20 to 2028/29.

**Employment Land Provision**

The plan provides for 130,890m<sup>2</sup> of employment floorspace in the period from 2011-2031. Waterloo and Vauxhall are identified as the areas with the most significant potential for job growth within the Borough.

The Draft Revised Lambeth Local Plan Proposed Submission Version seeks to support the development of large offices in the Central Activities Zone, Vauxhall and Waterloo London Plan Opportunity Areas, and Brixton and Streatham major town centres.

**HRA**

The Habitat Regulations Assessment Screening Report of the Lambeth Local Plan (February 2013) states that there is unlikely to be significant adverse effects on European sites. It is suggested that the sites in which vulnerabilities to the Local Plan most likely include Epping Forest. Having identified potential pathways of impact to the integrity of these sites, it was assessed that the Local Plan will not have a significant adverse effect on them.

Following updates to the Lambeth Local Plan in September 2015, an Addendum of the 2013 HRA report was conducted. Despite the modifications made to the Local Plan, no likely significant effects on European Sites were identified. As such, no alterations were made to the conclusions of the original HRA assessment.

An initial Stage 1 of the HRA process (screening), published in December 2019, of the proposals included within the DRLLP PSV 2020 did not identify any likely significant effects or impacts on the integrity of any European, Natura 2000 sites. The May 2020 and HRA addendum also did not identify any likely significant effects or impacts on the integrity of any European, Natura 2000 sites by the DRLLP PSV 2020, either alone or in-combination with other plans.

**Therefore, there are no likely in-combination effects of the adopted Lambeth Local Plan or the Draft Revised Lambeth Local Plan Proposed Submission Version with the City of London Local Plan.**

**Southwark Local Plan: Southwark Core Strategy (April 2011); Southwark Plan (2007) saved policies**

**New Southwark Plan Submission Version - Proposed Modifications for Examination 2019 to 2034**

**Status**

The adopted Local Plan is comprised of the Core Strategy and the saved policies within the Southwark Plan. The Southwark Core Strategy was adopted in April 2011. The Southwark Plan was adopted in 2007 and a selection of these policies were 'saved' in April 2013.

The New Southwark Plan (NSP) was published in December 2017 with the consultation period closing in February 2018 (Regulation 19). The New Southwark Plan: Proposed Submission Version: Amended Policies 2019 was released for public consultation in January 2019 and proposed substantial changes to a number of policies. An amalgamated version of both documents (the New Southwark Plan Submission Version – Proposed Modifications for Examination) was submitted to the Secretary of State for examination in public in January 2020. Once

fully adopted, the NSP will provide strategy for Southwark for up to 2033 and will replace the Southwark Plan (2007) saved policies and the Core Strategy (April 2011).

**Housing Provision**

The adopted Southwark Core Strategy set out a target of 24,450 new homes between 2011-2026. It is suggested this will be possible with the continuation of the development rate of 1,630 new homes a year. Key areas identified for housing provision were Elephant and Castle (4,000 dwellings), Bankside, Borough and London Bridge (1,900 dwellings) and Canada Water (2,500 dwellings). The housing provision planned for in the Southwark Plan was superseded by those within the Core Strategy.

The New Southwark Local Plan sets out a target of building 2,355 homes per year, with the majority of these being built in the Central Activities Zone (CAZ), Canada Water Action Area Core, Aylesbury Action Area Core and Peckham Action Area Core.

**Employment Land Provision**

The adopted Southwark Core Strategy set out a target of providing 400,000-500,000m<sup>2</sup> of additional employment floorspace in the Bankside, Borough and London Bridge Opportunity Area by 2026. It also sets out that there will be provision of 25,000-30,000m<sup>2</sup> additional floorspace in the CAZ, town and local centres, strategic cultural areas, action area cores, Camberwell Action Area and on classified roads. The employment land provision planned for in the Southwark Plan was superseded by those within the Core Strategy.

The New Southwark Local Plan provides for 47,000 new office jobs over 20 years and it aims to provide 450,000m<sup>2</sup> of new office space in the Central Activity Zone and in town centres.

**HRA**

The November 2009 Appropriate Assessment of the Southwark Core Strategy states none of the policies suggested are likely to have significant adverse effects on European sites. In addition, the March 2016 HRA document for the Development Viability SPD states that the guidance outlined on implementing policies in the Southwark Core Strategy is unlikely to have any significant adverse effects on European sites.

The January 2017 HRA document for the New Southwark Plan states that the area visions and site allocations for development are unlikely to have any significant adverse effects on European sites.

The January 2020 New Southwark Plan Submission Version HRA concluded that none of the strategic policies, development management policies, area visions or site allocations within the New Southwark Plan: Submission Version are likely to have any discernible adverse impact on European Sites.

**Therefore, there are likely no in-combination effects of the adopted or emerging Southwark Local Plan with the City of London Local Plan.**

**Tower Hamlets Local Plan 2031**

**Status**

The Tower Hamlets Local Plan 2031 was adopted by the Council in January 2020.

**Housing Provision**

The Tower Hamlets Local Plan 2031 aims to deliver at least 58,965 new homes across the borough, equating to at least 3,931 new homes per year, between 2016 and 2031. This includes 21,100 new affordable homes over the same period to meet future needs. Key areas identified for housing provision are the Isle of Dogs and South Poplar (31,209 dwellings), City Fringe (10,334 dwellings), Lower Lea Valley (5,748 dwellings) and the Central Area (7,597 dwellings).

**Employment Land Provision**

The Local Plan 2031 sets a target of creating 125,000 new jobs over the plan period to 2031. These will be directed to a number of designated employment locations, including Preferred Office Locations (POLs), Central Activities Zones (CAZs), and Strategic Industrial Locations (SILs). Key areas identified for the provision of employment floorspace are at Canary Wharf, Blackwall, Cambridge Heath, Tower Gateway East, Whitechapel, and Empson Street.

**HRA**

The September 2017 HRA for the Tower Hamlets Draft Local Plan concluded that the plan will have no significant effects (alone or in combination) on any European sites due to either an absence of impact pathways; policy controls within the plan (and at the Greater London level) that can be relied on to ensure significant effects are avoided; or external controls (such as the water resources planning process) that account for the growth aspects of the plan and with which the plan is consistent.

In March 2019, an HRA Addendum to the 2017 Tower Hamlets Draft Local Plan Integrated Impact Assessment of the Pre-submission Minor Modifications, Post-Submission Main Modifications and Post-Submission Additional Modifications to the draft Local Plan was produced. This assessment concluded that no modifications to the Local Plan would alter the previous HRA conclusions or require additional assessment.

**Therefore, there are likely to be no in-combination effects of the adopted Tower Hamlets Local Plan 2031 with the City of London Local Plan.**

<p><b>Westminster City Local Plan: City Plan (November 2016); The Unitary Development Plan (January 2007)</b>  <b>City Plan 2019-2040: Regulation 19 Publication Draft (June 2019)</b></p>
<p><b>Status</b></p> <p>The adopted Local Plan is comprised of the Westminster City Plan and the Unitary Development Plan. The Westminster City Plan was adopted in November 2016 and set out a vision for up to 2027 and beyond. The Unitary Development Plan was approved in January 2001 and parts were 'saved' in 2010.</p> <p>The Council is preparing a new City Plan 2019-2040, which once adopted, will replace all current policies in Westminster's City Plan (November 2016). This was submitted for examination in November 2019.</p> <p><b>Housing Provision</b></p> <p>The Westminster City Plan provides for housing in all parts of Westminster, but it will not be considered appropriate on all sites in the Central Activities Zone. It is set out that 1,068 new homes will be delivered annually in Westminster. The housing provision planned for in the Unitary Development Plan was superseded by those within the Core Strategy.</p> <p>The emerging City Plan 2019-2040 aims to deliver 22,222 new homes over the plan period.</p> <p><b>Employment Land Provision</b></p> <p>The Westminster City Plan provides for a projected growth in employment of around 77,000 jobs up to 2036. Key areas outlined for employment growth are Paddington Opportunity area (5,000 new jobs), Victoria Opportunity Area (4,000 new jobs) and Tottenham Court Road Area (5,000 new jobs). This will be facilitated through 50% of floorspace across the whole core CAZ being allocated as office floorspace. The employment land provision planned for in the Unitary Development Plan was superseded by those within the Core Strategy.</p> <p>The new City Plan 2019-2040 will provide economic support through at least 63,000 new jobs over the Plan period. Key areas identified for this provision are Central Activities Zones (CAZs) including the West End Retail and Leisure Special Policy Area (WERLSPA), the North West Economic Development Area (NWEDA), and Church Street/Edgware Road Housing Renewal Area, as well as the existing town centres.</p> <p><b>HRA</b></p> <p>The March 2015 Appropriate Assessment Screening Report document for the revisions to Westminster's City Plan (2016) states that there is unlikely to be any changes to conclusions set out in previous assessment as a result of the changes in strategy. As such, there is unlikely to be any significant adverse effects upon European sites.</p> <p>An Appropriate Assessment Screening Report was conducted for the new City Plan 2019-2040 in June 2019 and determined that no European sites would be impacted by any policies contained in the draft plan.</p> <p><b>Therefore, there are likely no in-combination effects of the adopted Westminster Local Plan or the emerging City Plan 2019-2040 with the City of London Local Plan.</b></p>
<p><b>Camden Local Plan 2017</b></p>
<p><b>Status</b></p> <p>The Camden Local Plan was adopted by the Council in July 2017 and replaced the Core Strategy and Camden Development Policies documents. The Local Plan covers the period from 2016-2031.</p> <p><b>Housing Provision</b></p> <p>The Council aims to maximise the supply of housing in the borough by exceeding a target of 16,800 additional homes over the plan period. This consists of an annual target of 1,176 additional homes for the period 2016/17 to 2020/21, and an annual target of 1,092 for the period 2021/22 to 2030/31.</p> <p>Key areas identified for housing development include King's Cross (1,900 new homes), Euston (2,800-3,800 new homes), Tottenham Court Road (500 new homes), Holborn (200 new homes) and the West Hampstead Interchange (800 new homes).</p> <p><b>Employment Land Provision</b></p> <p>The adopted Local Plan will direct new office development to key growth areas in the borough, Central London, and the existing town centres in order to meet the forecast demand of 695,000sqm of office floorspace between 2014 and 2031. The majority of this demand will be met at King's Cross with 444,000sqm of office space. Large-scale office development is also planned for Euston, with 180,000 to 280,000sqm of business floorspace over the plan period.</p> <p>The Local Plan also aims to deliver new jobs over the plan period, focused on Camden's growth areas: King's Cross (25,000 indicative jobs), Euston (7,700-14,100 indicative jobs), Tottenham Court Road (5,000 indicative jobs), Holborn (2,000 indicative jobs) and West Hampstead Interchange (100 indicative jobs).</p> <p><b>HRA</b></p> <p>The HRA screening exercise of the Draft Camden Local Plan 2015 determined that none of the proposed policies were likely to have significant effects on European sites.</p>

<b>Therefore, there are likely no in-combination effects of the adopted Camden Local Plan with the City of London Local Plan.</b>
<b>Local Plans and Strategies: Authorities containing Epping Forest SAC and Lee Valley SPA and Ramsar Site</b>
<b>Broxbourne Local Plan 2018-2033</b>
<p><b>Status</b></p> <p>The Broxbourne Local Plan 2018-2033 was adopted in June 2020.</p> <p><b>Housing Provision</b></p> <p>The Local Plan makes provision for at least 7,718 new homes, with strategic allocations at Cheshunt Lakeside, Brookfield Garden Village and Rosedale Park.</p> <p><b>Employment Provision</b></p> <p>The Local Plan makes provision for 5,000 to 6,000 net additional jobs focusing on strategic development sites at Brookfield, Park Plaza, Cheshunt Lakeside and the town centres.</p> <p><b>HRA</b></p> <p>The March 2018 HRA of the emerging Broxbourne Local Plan concludes that a likely significant effect of the Local Plan on European sites, either alone or in-combination with other plans or projects, can be objectively ruled out.</p> <p>In December 2019, an HRA report of the main modifications to the emerging Broxbourne Local Plan 2018-2033 was conducted to supplement the earlier 2018 HRA outputs. It was concluded that the Main Modifications would not have an adverse impact on the site integrity of a European site.</p> <p><b>Therefore, there are likely to be no in-combination effects of the adopted Broxbourne Local Plan with the City of London Local Plan.</b></p>
<b>East Hertfordshire District Plan</b>
<p><b>Status</b></p> <p>The East Hertfordshire District Plan 2018 was adopted in October 2018, following Main Modifications, and sets out the planning framework for the District for the period of 2011-2033.</p> <p><b>Housing Provision</b></p> <p>The adopted East Hertfordshire District Plan makes provision for 18,458 new homes from 2011-2033, including at allocations at North of Bishop's Stortford, West of Hertford, and East of Stevenage. This equates to 839 new homes per year.</p> <p><b>Employment Provision</b></p> <p>The adopted East Hertfordshire District Plan makes provision for 10-11ha of new employment land north of Buntingford Business Park, at South of Bishop's Stortford and at North and East of Ware. It also aims to deliver a minimum of 10,800 new jobs over the plan period.</p> <p><b>HRA</b></p> <p>The September 2016 HRA of the East Hertfordshire District Plan concluded that, provided that the recommendations made in the HRA are incorporated into the Local Plan (that reference to a commitment by the Council to identify strategic initiatives to manage recreation at Wormley Hoddesdonpark Woods SAC is added), the plan will not result in a likely significant effect, either alone or in combination, upon any European sites.</p> <p>In February 2018, an HRA of the Main Modifications to the East Hertfordshire District Plan determined that the modifications do not alter the conclusions of the HRA of the submitted Local Plan, as that HRA had already identified an 'in-combination' air quality effect that would require addressing. It was concluded that the Council already provides sufficient framework to address these issues in combination with neighbouring authorities.</p> <p><b>Therefore, there are likely to be no in-combination effects of the adopted East Hertfordshire Local Plan with the City of London Local Plan.</b></p>
<b>Adopted Epping Forest Local Plan: Combined Policies of Epping Forest District Local Plan (1998) and Alterations (2006)</b>
<b>Epping Forest District Local Plan: Submission Version (December 2017)</b>
<p><b>Status</b></p> <p>The adopted Local Plan is comprised of the Local Plan, adopted in 1998, and the Local Plan Alterations, adopted in 2006.</p> <p>The Epping Forest Local Plan: Submission Version 2017 was submitted for examination in September 2018 and Main Modifications to this are in preparation. Once adopted, this will replace the current Local Plan, and will set out the Council's proposed strategy to meet the economic and housing needs in the District up to 2033.</p>

<p><b>Housing Provision</b></p> <p>The plan period for housing delivery proposed in the adopted Local Plan extended until 2011, therefore the relevant policy has expired.</p> <p>The emerging Epping Forest Local Plan makes provision for a minimum of 11,400 homes over the plan period, including sites around Harlow (3,900), Epping (1,305), Loughton (1,021), Waltham Abbey (858), Ongar (590), North Weald Bassett (1,050) and Chigwell (376).</p> <p><b>Employment Land Provision</b></p> <p>The adopted Local Plan supports the redevelopment and extension of existing employment premises within existing employment areas.</p> <p>The emerging Epping Forest Local Plan makes provision for 23ha of employment land over the plan period at Langston Road Industrial Estate (1 ha), North Weald Airfield (10 ha), Dorrington Farm (1 ha), Galley Hill Road Industrial Estate (1 ha) and Land North of A121 (10 ha).</p> <p><b>HRA</b></p> <p>A HRA for the adopted Local Plan could not be located. However, the development quantum proposed by the plan has expired. As such, there is unlikely to be any significant adverse effects upon European sites.</p> <p>The January 2019 HRA of the Epping Forest Local Plan (submission version) concluded that the plan will not result in a likely significant effect, either alone or in combination, upon any European sites, provided the recommendations made in the HRA are incorporated within the plan. It recommended that all allocations above a certain size should consider any potential to deliver their own on-site accessible natural greenspace. The recommendations made were intended to ensure that any issues that may arise regarding air quality, recreational pressure (including urbanisation) on Epping Forest SAC would be identified and addressed before they result in a likely significant effect. However, Natural England had concerns about some aspects of the 2019 HRA methodology and suggested that further work was necessary to be satisfied that no reasonable scientific doubt remained' that the development proposed in the Epping Forest Local Plan (submission version), taking into account the mitigation measures proposed by the 2019 HRA, would not have an adverse effect on the integrity of the Epping Forest SAC. The Local Plan Inspector has advised the Council to undertake additional HRA work to address these concerns. After working with Natural England for some time, the Council has now agreed an Interim Air Pollution Strategy that Natural England and the Council believe will be acceptable to the Local Plan Inspector although it has yet to be considered by the Inspector.</p> <p><b>Therefore, there are likely to be no in-combination effects of the adopted or emerging Epping Forest Local Plan with the City of London Local Plan.</b></p>
<p><b>Redbridge Local Plan 2015-2030 (March 2018)</b></p>
<p><b>Status</b></p> <p>Redbridge Local Plan 2015-2030 was adopted in March 2018.</p> <p><b>Housing Provision</b></p> <p>The Local Plan makes provision for a minimum of 16,845 new dwellings over the plan period from 2015-2030. These will be focussed in the borough's Investment and Growth Areas of Ilford, Crossrail Corridor, Gants Hill, South Woodford and Barkingside.</p> <p><b>Employment Land Provision</b></p> <p>The Local Plan makes provision for a minimum of 21,206m<sup>2</sup> (net) new purpose built modern flexible office and business accommodation in Investment and Growth Areas, town centres, and other land previously used for employment purposes.</p> <p><b>HRA</b></p> <p>The February 2017 HRA of the Redbridge Local Plan concluded that in the key areas of planned residential development and population increase within SAC 'risk zones', and policies affecting air quality, there would be no likely significant effect on European sites as a consequence of implementing the Local Plan, subject to some project-level mitigation measures provided for in development control policies. It concluded that there will be no likely significant effect of the Local Plan on European conservation sites.</p> <p>The October 2017 HRA Addendum to the submitted HRA of the Redbridge Local Plan 2015-2030 determined that the conclusions of no likely significant effect on Epping Forest SAC made in the submitted HRA remains valid following the Main and Additional Modifications to the Local Plan.</p> <p><b>Therefore, there are likely no in-combination effects of the adopted Redbridge Local Plan with the City of London Local Plan.</b></p>
<p><b>Waltham Forest adopted Local Plan: Core Strategy (March 2012) and the Development Management Policies (October 2013)</b>  <b>Waltham Forest Local Plan (LP1) Proposed Submission Document (Regulation 19) (October 2020)</b></p>
<p><b>Status</b></p> <p>The adopted Local Plan is comprised of the Core Strategy, adopted in March 2012, and the Development Management Policies, adopted in October 2013.</p> <p>The emerging Waltham Forest Local Plan will be comprised of Part 1: Strategic policies, and Part 2: Site Allocations. Part 1 was published for Regulation 19 consultation in October 2020; Part 2 has not yet reached the Regulation 19 consultation stage and is therefore not considered in the in-combination assessment.</p>

**Housing Provision**

The Core Strategy makes provision for a minimum of 10,320 homes over the plan period to 2026, including at Black Horse Lane (2,000), the Northern Olympic Fringe (800), Walthamstow Town Centre (2,000) and Wood Street (600).

The Emerging Local Plan Part 1 will make provision for a minimum for 27,000 homes by 2035. Housing delivery will be focussed in Waltham Forest's Strategic Locations, Site Opportunity Locations, and accessible locations around transport hubs.

**Employment Land Provision**

The Core Strategy supports the intensification and upgrading to existing employment land in the Borough Employment Areas and the development of some new employment uses outside of designated areas.

The Emerging Local Plan Part 1 will make provision for a minimum of 52,000sqm of additional employment floorspace over the plan period. This deliver will be focussed on designated Strategic Industrial Land, Locally Significant Industrial Sites, Borough Employment Areas, non-designate employment land and town centres.

**HRA**

The May 2011 HRA of the Core Strategy concluded that significant effects are unlikely to occur on any European sites as a result of Core Strategy development, either alone or in combination with other plans and projects.

The July 2012 HRA of the Development Management Policies concluded that no pathways of impact leading to likely significant effects will occur on any European sites.

The October 2020 HRA of the emerging Local Plan Part 1 would not result in adverse effects on the integrity of the Lee Valley SPA and Ramsar, both alone or in combination with growth in neighbouring areas. However, it was not yet possible for the HRA of the Waltham Forest Local Plan Part 1 to conclude that there would be no adverse effect on the Epping Forest SAC from air pollution, as an air quality study is currently being completed and an addendum to the HRA incorporating the findings of the air quality study has yet to be published. In any event, contributions to air pollution at Epping Forest SAC from the City Plan 2036 are judged to be negligible therefore there will not be an in-combination effect with other plans

**Therefore, there are likely no in-combination effects of the adopted Waltham Forest Local Plan with the City of London Local Plan.**

**Regional Plans**

**The London Plan (March 2016)**

**The new London Plan – 'Intend to Publish' version (December 2019)**

**Status**

The adopted London Local Plan was published in March 2016 and amended in January 2017 to correct typesetting errors.

The Greater London Authority is currently preparing a new London Plan which will cover the period 2019-2041. The Draft London Plan has undergone several Modifications, and the Intend to Publish version of the new London Plan was released in December 2019 and is due to be laid before the London Assembly.

**Development Provision**

The adopted London Plan sets a ten-year housing supply target (2015-2025) of 1,408 homes for the City of London. In addition, the plan sets ten-year housing supply targets for the Greater London authorities neighbouring the City of London and those containing the Lee Valley SPA and Ramsar and the Epping Forest SAC: Camden (8,892); Hackney (15,988); Islington (12,641); Lambeth (15,594); Redbridge (11,232); Southwark (27,362); Tower Hamlets (39,314); Waltham Forest (8,620) and Westminster City (10,677).

The new London Plan sets a ten-year housing supply target (2019/20-2028/29) of 1,460 homes for the City of London. In addition, the plan sets ten-year housing supply targets for the Greater London authorities neighbouring the City of London and those containing the Lee Valley SPA and Ramsar and the Epping Forest SAC: Camden (10,380); Hackney (13,280); Islington (7,750); Lambeth (13,350); Redbridge (14,090); Southwark (23,550); Tower Hamlets (34,730); Waltham Forest (12,640) and Westminster City (9,850).

The new London Plan also highlights that the Lee Valley Opportunity Area, Crossrail 2, the Crossrail 2 North and South Growth Corridor and various 'Strategic Industrial Locations' are in proximity to the Lee Valley SPA and Ramsar and the Epping Forest SAC, and that the City of London is located within the Central Activities Zone.

**HRA**

The 2009 HRA of the adopted London Plan and the 2013 HRA of the Further Alterations to the London Plan concluded that there are sufficient protective mechanisms in place (including reliance on HRA of lower tier plans, where appropriate) to ensure that the growth objectives of the London Plan can be delivered without an adverse effect on the integrity of European sites, either alone or in combination with other plans and projects.

An HRA was published for consultation alongside the Draft London Plan in December 2017, which concluded that once identified amendments to policies or matters of direction to Boroughs are addressed, there are sufficient protective mechanisms in place to ensure that the growth objectives of the London Plan can be delivered without a likely significant effect on European sites, either alone or in combination

<p>with other plans and projects. This was updated during 2018 to reflect consultation comments and minor suggested changes to the London Plan and came to the same conclusion.</p> <p>In December 2019, an HRA to identify whether any of the Modifications to the Draft London Plan alter the conclusions of previous HRA was published. The HRA determined that the 'Intend to Publish' version of the London Plan shows all of the suggested changes following the Examination of the draft Plan. It was concluded that the modifications to the London Plan will not alter the conclusion of no adverse effect on the integrity of European sites that was identified in the earlier, 2018 HRA.</p> <p><b>Therefore, there are no likely in-combination effects of the adopted London Plan or the new London Plan with the City of London Local Plan.</b></p>
<p><b>North London Waste Plan (NLWP) Proposed Submission (January 2019)</b></p>
<p><b>Status</b></p> <p>The NLWP covers the seven North London Boroughs of Barnet, Camden, Enfield, Hackney, Haringey, Islington, and Waltham Forest (including part of the Lee Valley SPA and Ramsar and part of the Epping Forest SAC). It sets out the preferred option for how the waste management needs for North London will be met for each waste stream over the plan period. Once adopted, it will form part of the Development Plan for each of the North London Boroughs, which comprises the London Plan and borough Local Plans.</p> <p>The NLWP Examination Hearings took place in November 2019. The Boroughs consulted on main modifications to address issues raised at the Hearings from October – December 2020. The North London Boroughs will provide responses to the representations on Main Modifications which will be given to the Inspector for them to consider in the final stages of the examination and to inform the recommendations in his final report.</p> <p><b>HRA</b></p> <p>The January 2019 HRA of the proposed submission North London Waste Plan concluded that, providing available safeguards and mitigation measures are effectively applied, the implementation of the NWLP is not likely to cause any adverse effects on any designated European sites.</p> <p><b>Therefore, there are likely no in-combination effects of the proposed submission North London Waste Plan (NLWP) with the City of London Local Plan.</b></p>
<p><b>Hertfordshire Waste Plan: Hertfordshire Waste Development Framework: Waste Core Strategy &amp; Development Management Policies (2012)</b></p> <p><b>Hertfordshire Waste Development Framework: Waste Site Allocations Development Plan Document 2011-2026 (2014)</b></p>
<p><b>Status</b></p> <p>The Waste Local Plan covers Hertfordshire County Council, including the authorities of Broxbourne and East Hertfordshire (including parts of the Lee Valley SPA and Ramsar), Dacorum, Hertsmere, North Hertfordshire, St Albans, Stevenage, Three Rivers, Watford and Welwyn Hatfield.</p> <p>The Local Plan is comprised of the Hertfordshire Waste Development Framework: Waste Core Strategy &amp; Development Management Policies Development Plan Document 2011-2026, which was adopted in November 2012, and the Hertfordshire Waste Development Framework: Waste Site Allocations Development Plan Document 2011-2026, which was adopted in July 2014.</p> <p><b>HRA</b></p> <p>The September 2010 HRA of the draft submission version of the Waste Core Strategy and Development Management Policies concluded that the none of the European Sites considered were likely to be significantly affected by the Waste Core Strategy &amp; Development Management Policies DPD objectives or policies, either alone or in-combination with other plans or projects. In addition, the Forward of HRA report included within the published HRA, dated November 2012, states that the proposed changes to the plan submitted prior to adoption did not include any revisions to the Waste Core Strategy that would change the HRA screening conclusions presented in the September 2010 HRA Screening Report.</p> <p>The December 2013 HRA Addendum of the Waste Site Allocations Development Plan Document stated that no significant effects are considered likely to occur on any of the European sites within and adjacent to Hertfordshire as a result of implementing the Waste Site Allocations document (alone or in combination) and developing waste facilities on the final eight allocated sites.</p> <p><b>Therefore, there are likely no in-combination effects of the Hertfordshire Waste Plan with the City of London Local Plan.</b></p>
<p><b>Essex and Southend-on-Sea Waste Local Plan (2017)</b></p>
<p><b>Status</b></p> <p>The Essex and Southend-on-Sea Waste Local Plan was adopted by Essex County Council in July 2017, and by Southend-on-Sea Borough Council in October 2017. The plan includes the authorities of Epping Forest (including parts of the Lee Valley SPA and Ramsar and part of the Epping Forest SAC), Harlow, Brentwood, Basildon, Castle Point, Rochford, Maldon, City of Chelmsford, Uttlesford, Braintree, Colchester, Tendring and Southend-on-Sea.</p> <p><b>HRA</b></p>

The January 2016 HRA Screening Report for the pre-submission Waste Local Plan states that the Plan's Vision, strategic objectives; spatial strategy; strategic waste management allocations; locational criteria; development management criteria and other policies have been screened out as having likely significant effects on European Sites, as long as appropriate protection measures are in place, as recommended in this HRA.

**Therefore, there are likely no in-combination effects of the Essex and Southend-on-Sea Waste Local Plan with the City of London Local Plan.**

**Joint Waste Development Plan for the East London Waste Authority Boroughs (2012)**

**Status**

The Joint Waste Development Plan for the East London Waste Authority Boroughs, including the London Boroughs of Redbridge (including part of the Lee Valley SPA and Ramsar and part of the Epping Forest SAC), Barking & Dagenham, Havering and Newham and was adopted in February 2012.

**HRA**

An HRA for the Joint Waste Development Plan concluded that none of the plan policies or sites are likely to have any significant discernible adverse impact on European sites either in isolation or when considered in association with any other policy, site or plan.

**Therefore, there are likely no in-combination effects of the Joint Waste Development Plan for the East London Waste Authority Boroughs with the City of London Local Plan**