

Isle of Dogs and South Poplar OAPF

HRA Screening Report

On behalf of **The Greater London Authority**

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1 Introduction

1.1 Background

- 1.1.1 Peter Brett Associates LLP (PBA) has been commissioned by the Greater London Authority (GLA) to prepare this Habitats Regulations Assessment (HRA) Screening Report in respect of the emerging Isle of Dogs and South Poplar Opportunity Area Planning Framework ('the OAPF'). The Report responds to requirements of the Conservation of Habitats and Species Regulations, 2017 (the Habitats Regulations) which implements the requirements of the European Commission's Habitats Directive 92/43/EEC. Consideration is given as to whether or not the OAPF is likely to have significant effects on the integrity of sites designated of European level biodiversity interest, either alone, or in combination with other plans or projects.
- 1.1.2 This report supersedes the HRA element of an earlier Integrated Impact Assessment (IIA) Screening and Scoping Report prepared by PBA (October 2017). The GLA previously intended to undertake a full IIA, including HRA, of the OAPF, but owing to changes in the planned content of the OAPF and higher level policy developments in the interim period, it is now considered that the OAPF is unlikely to have significant effects on the integrity of European Sites and therefore, a full HRA is not required. This purpose of this screening report is to confirm this assumption.
- 1.1.3 The revised draft of the OAPF (May 2018) is intended to dovetail with the emerging London Borough of Tower Hamlets (LBTH) Local Plan and the next London Plan. The Regulation 19 Proposed Submission LBTH Local Plan and the Draft New London Plan were published for consultation in October and November 2017 respectively (referred to herein as the LBTH Local Plan (2017) and the Draft London Plan (2017) respectively).
- 1.1.4 A HRA was undertaken for the Draft London Plan (AECOM, 2017), and a IIA (including HRA) was undertaken of the emerging LBTH Local Plan (Amec Foster Wheeler, 2017). These assessments considered the implications for European Sites of proposed policies and proposals at London and LBTH levels respectively, including those relating to the Isle of Dogs and South Poplar Opportunity Area 'the OA'). However, owing to the higher level spatial scale of these emerging plans, neither assessment was able to specifically consider the implications of the lower level OAPF, which is the focus of this screening report.

1.2 The Need for Plan Assessment

- 1.2.1 Article 6 of the European Habitats Directive (92/43/EEC) provides the means by which the European Union meets its obligations in relation to natural habitats, flora and fauna under the Bern Convention. The main provision of the Directive relevant to this report is concerned with the assessment and review of plans and projects which have the potential to affect Natura 2000 sites. Natura 2000 sites include: Special Protection Areas established in accordance with the requirements of the Birds Directive (2009/147/EC as amended) and Special Areas of Conservation established in accordance with the requirements of the Habitats Directive.

- 1.2.2 Articles 6(3) and 6(4) of the Habitats Directive state:

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

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

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

- 1.2.3 The Conservation of Habitats and Species Regulations 2017 (as amended) (Habitats Regulations) transpose into domestic legislation obligations associated with both the European Birds Directive and the Habitats Directive. Regulation 102 of the Habitats Regulations is the most pertinent in relation to this report. Regulation 102(1) states:

Where a land use plan—

(a) is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and

(b) is not directly connected with or necessary to the management of the site,

the plan-making authority for that plan must, before the plan is given effect, make an appropriate assessment of the implications for the site in view of that site's conservation objectives.

- 1.2.4 The term 'Habitats Regulations Assessment' is used to cover the whole process of assessing the effects of a land use plan on European sites and Ramsar sites. An Appropriate Assessment is only one stage within the whole process of HRA (see methodology section for further details).

- 1.2.5 The European site network comprises sites of nature conservation value that benefit from statutory protection at the European level. These sites include: Special Areas of Conservation (SACs) and candidate Special Areas of Conservation (cSACs) [designated under the EC Habitats Directive]; Special Protection Areas (SPAs) and potential Special Protection Areas (pSPAs) [classified under the EC Birds Directive 1979, 79/409/EEC]. The Government also expects candidate SACs (cSACs), potential SPAs (pSPAs), and Ramsar sites [designated under the Ramsar Convention 1976] to be included within the HRA process. For the purposes of this report European sites are considered to include SACs, cSACs, SPAs, pSPAs and Ramsar sites.

1.3 Purpose of This Report

- 1.3.1 This report presents the HRA for the emerging Isle of Dogs and South Poplar Opportunity Area Planning Framework ('the OAPF'). It sets out the methodology for the HRA, determines the European sites that require consideration with regards to potential effects arising from the OAPF, and then goes through the assessment process, assessing likely significant effects on relevant European sites and presents its conclusions.

1.4 Consultation

- 1.4.1 Consultation has not taken place regarding this HRA screening report specifically. However, in their role as a SEA Consultation Body, Natural England have been consulted on both the previous IIA Screening and Scoping Report (PBA, October 2017) and a revised SEA Screening Report (PBA, March 2018). In both cases, Natural England confirmed that the

OAPF is not considered likely to present any risk to their statutory duties, whilst their response to the SEA Screening Report (March 2018) also confirmed their view that the OAPF is not likely to have significant effects on the environment.

- 1.4.2 It can therefore reasonably be assumed that Natural England's comments also refer to a lack of risk to integrity on European sites, as assessed by the HRA screening element of the IIA. It is therefore considered reasonable to assume that Natural England would be expected to provide similar comments in relation to the outcome of this HRA Screening Report. This assumption is substantiated by Natural England's response to the higher level IIA (including HRA) for the Draft LBTH Local Plan (2017) which confirmed their agreement to the finding of no likely significant effects (AFW, 2017).

2 Methodology

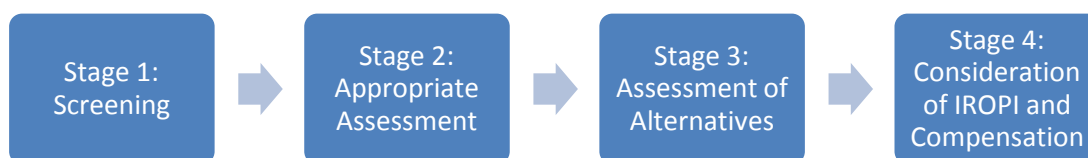
2.1 Screening and Appraisal Methodology

2.1.1 The European Commission has developed guidance in relation to Articles 6(3) and 6(4) of the Habitats Directive¹, and this recommends a four stage approach to addressing the requirements of these Articles. The four stages can be summarised as follows:

- **Stage 1** – Screening: This stage identifies the likely effects of a plan or project on a European site, either alone or in combination with other plans or projects. Specifically, this stage considers whether any such effects could be significant, and hence lead to LSE. If no potential for significant effects on any European sites is identified through the screening exercise, no further assessment is required;
- **Stage 2** – Appropriate Assessment: If it is considered that a plan or project could lead to LSE on a European Site, the requirements of Stage 2 are triggered. This stage considers whether the plan or project could adversely affect the integrity of one or more European site(s), either alone or in combination with other plans or projects. The assessment should consider the implications for the site in view of the site's conservation objectives and its conservation status. If the potential for adverse effects on site integrity are identified, this assessment should also consider measures to control the identified impacts so as to avoid adverse effects on site integrity.
- **Stage 3** – Assessment of alternative solutions: If adverse impacts are predicted and it is not possible to fully mitigate those impacts, this stage examines alternative ways of achieving the objectives of the plan or project that avoid adverse impacts on the integrity of a European site.
- **Stage 4** – Assessment where no alternative solutions exist and where adverse impacts remain: This stage assesses compensatory measures where it is deemed that the project or plan should proceed for Imperative Reasons of Overriding Public Interest (IROPI).

2.1.2 **Figure 2.1**, below illustrates the four stage approach to HRA:

Figure 2.1: Stages in HRA



2.1.3 Within these various stages the Habitats Directive promotes the adoption of a hierarchy of avoidance, mitigation and compensatory measures. Consequently, the first step is to try and ensure that the plan and the policies presented within it avoid negative impacts on European sites. If potential negative impacts are identified and avoidance is not feasible, then mitigation measures need to be applied such that no adverse effects on European sites remain.

¹ European Commission (2001). Assessment of plans and projects significantly effecting Natura 2000 site. Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC. Published November 2001.

- 2.1.4 If impacts cannot be fully mitigated then the policy should be rejected, or taken forward to the final stage, i.e. assessment of compensatory measures where it is deemed that the project or plan should proceed for Imperative Reasons of Overriding Public Interest (IROPI). Best practice guidance² indicates that stages 3 and 4 should be avoided as there will almost always be an alternative and IROPI is extremely difficult to justify in the majority of cases.
- 2.1.5 The methodologies used in this report have been informed by a range of guidance. In particular, the methodological approaches recommended in the Habitats Regulations Assessment Handbook² have been used to inform the approaches taken in this assessment. The Handbook is recognised as providing authoritative guidance on the application of the Habitats Regulations within the UK (including its territorial waters), providing advice on all aspects of completing HRA for plans and projects.
- 2.1.6 The results of the Stage 1 Screening exercise carried out for the OAPF is presented in **Sections 3 and 4** of this report, in particular **Table 4.1**. This identifies the substantive components of the OAPF and considers whether they could contribute to adverse effects and/or undermine the conservation objectives of the European sites.

2.2 In Combination Effects

- 2.2.1 Further to the assessment of substantive components in the OAPF detailed in **Table 4.1**, an in-combination assessment has been carried out with other plans and projects. Those components of the OAPF that could only have, at most, a 'non-significant' effect in their own right, but which could potentially lead to likely significant effects on the European Sites under consideration in combination with other plans or projects, have been included in the in-combination assessment.

² Tyldesley, D., Chapman, C., and Machin, G. *The Habitats Regulations Assessment Handbook*. DTA Publications Ltd. Accessed from www.dtapublications.co.uk on the 1st November 2017.

3 Relevant European Sites

3.1 Confirmation of Relevant European Sites

- 3.1.1 This section presents an initial 'coarse screening exercise' to determine which European Sites could be potentially affected by the guidance and proposals set out within the OAPF. This includes any European sites where there are any conceivable pathways by which the substantive components of the OAPF could lead to likely significant effects on the identified European Sites, either alone or in combination with other plans and policies. Those components of the OAPF for which there are no effect pathways or no conceivable exposure to a likely significant effect on the basis of self-evident information, have been scoped out at an early stage, and have not been considered in any detail.
- 3.1.2 The identification of European Sites is based on the likely impacts of the OAPF and the presence of conceivable effect pathways between the Isle of Dogs and South Poplar Opportunity Area ('the OA') and the European Sites, which could expose the qualifying features of the Sites to significant effects. Whilst the OAPF can only influence planning strategy or development within the boundary of the OA, there may be trans-boundary effects as a result of its implementation. In consideration of this, a 15km buffer area (zone of influence) has been used around the Isle of Dogs and South Poplar boundary, to identify those European Sites that could conceivably be affected by the OAPF. The nature and scale of potential effects is typically limited by distance, and it is considered that beyond 15 km, any potential effects arising from the proposed policies in the OAPF would be so minimal as to have an imperceptible effect on European Sites beyond this distance. The use of a 15 km search area is the same approach as that taken in the HRA (forming part of the IIA) for the Draft LBTH Local Plan (2017).
- 3.1.3 **Table 3.1** below lists the five European sites within 15km of the OAPF area, along with their qualifying features.

Table 3.1 European Sites within 15km of the OAPF Area.

European Site	Approximate Distance from OAPF Area	Qualifying Features
Epping Forest SAC	7.2 km	Atlantic acidophilus beech forests, Northern Atlantic wet heaths with <i>Erica tetralix</i> , and European dry heaths. Stag beetle (<i>Lucanus cervus</i>).
Richmond Park SAC	15 km	Stag beetle.
Wimbledon Common SAC	14.5 km	Northern Atlantic wet heaths with <i>Erica tetralix</i> , and European dry heaths. Stag beetle.
Lee Valley SPA	7.5 km	Internationally important populations of northern shoveler (<i>Anas clypeata</i>), gadwall (<i>Anas strepera</i>), and bittern (<i>Botaurus stellaris</i>).

European Site	Approximate Distance from OAPF Area	Qualifying Features
Lee Valley Ramsar	7.5 km	<p>Nationally scarce plant species (whorled water-milfoil <i>Myriophyllum verticillatum</i>) and the rare or vulnerable invertebrate (<i>Micronecta minutissima</i>).</p> <p>Species/ populations occurring at levels of international importance: Northern shoveler, and Gadwall.</p>

3.1.4 In considering potential effects of the OAPF on these European sites it is important to consider the conservation objectives of the sites and their condition such that the vulnerabilities of the sites can be taken into consideration as part of the HRA. It is this information, provided in **Table 3.2** below, that is used to determine the potential for the OAPF to have a significant effect on the European sites.

3.1.5 Ramsar sites do not have agreed conservation objectives but as Lee Valley Ramsar overlaps with the Lee Valley SPA boundary, it is the conservation objectives of the SPA that are presented in this case. The conservation objectives for SPAs and SACs are set by Natural England and published on their website. The condition assessment and factors affecting conservation status are taken jointly from a review of the condition assessments made of the Sites of Special Scientific Interest Units that make up the European sites and the reports made by JNCC to the European Union regarding the vulnerabilities of the European sites. The following resources were used to collate relevant baseline information:

- Joint Nature Conservation Committee (JNCC) website (www.jncc.gov.uk): citations for SPAs, SACs and Ramsar sites; detailed information about interest features;
- Natural England Website (www.naturalengland.org.uk): condition assessments for component SSSIs; potentially damaging operations for component SSSIs; and
- MAGIC Website (www.magic.gov.uk): boundary maps for SPAs, SACs and Ramsar sites.

Table 3.2 European Site Conservation Objectives and Condition Assessment

European Site	Conservation Objectives	Condition Assessment and factors influencing conservation status
<p>Epping Forest SAC</p>	<p>Avoid the deterioration of the qualifying natural habitats and the habitats of qualifying species, and the significant disturbance of those qualifying species, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving Favourable Conservation Status of each of the qualifying features.</p> <p>Subject to natural change, to maintain or restore:</p> <ul style="list-style-type: none"> - The extent and distribution of qualifying natural habitats and habitats of qualifying species; - The structure and function (including typical species) of qualifying natural habitats and habitats of qualifying species; - The supporting processes on which qualifying natural habitats and habitats of qualifying species rely; - The populations of qualifying species; - The distribution of qualifying species within the site. 	<p>The Epping Forest SSSI has almost the same boundary as the SAC; two small parts of the Forest to the north and south of the main parts of the SSSI are not included within the SAC. The SSSI condition assessment report by Natural England (December 2015) has recorded that the majority of the units within the SSSI in the SAC boundary are in an unfavourable condition, although many of these are “unfavourable recovering”.</p> <p>The potential threats to the site which could influence the conservation status of the habitats and species for which the SAC are designated include:</p> <p>Air pollution and, in particular, the effects of excessive levels of oxides of nitrogen and other pollutants, and the related deposition of acidity and of nitrogen. Many veteran trees display clear symptoms of stress (e.g. thin canopy and die-back of leading shoots), there is excessive growth of bramble, and there are dense stands of nettles along roadsides and ride edges, heathland areas show excessive growth of grasses;</p> <p>Habitat management and grazing management is required to optimise the ecological interest of the site in some units;</p> <p>Recreation pressure is having an adverse effect on some parts of the site (SSSI units 130 and 136 towards the southern end of Epping Forest).</p>
<p>Richmond Park SAC</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"> -The extent and distribution of the habitats of qualifying species - The structure and function of the habitats of qualifying species - The supporting processes on which the habitats of qualifying species rely - The populations of qualifying species, and, 	<p>The SSSI condition assessment report by Natural England (December 2014) has recorded that the majority of the units within the SSSI in the SAC boundary are in an unfavourable condition.</p> <p>No current pressures are identified in the Natural England Site Improvement Plan, although loss of dead wood habitat would affect the stag beetle population.</p>

European Site	Conservation Objectives	Condition Assessment and factors influencing conservation status
	<ul style="list-style-type: none"> - The distribution of qualifying species within the site. 	<p>The Richmond Park Management Plan should continue to be periodically reviewed to ensure the continuing availability of decaying wood habitat</p>
<p>Wimbledon Common SAC</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: The extent and distribution of qualifying natural habitats and habitats of qualifying species</p> <ul style="list-style-type: none"> - The structure and function (including typical species) of qualifying natural habitats - The structure and function of the habitats of qualifying species - The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely - The populations of qualifying species, and - The distribution of qualifying species within the site 	<p>The SSSI condition assessment report by Natural England (November 2014) states that there are no indication that indications that the species is under threat on a local scale but there are concerns about the conservation of stag beetle in a wider context.</p> <p>The potential threats to the site which could influence the conservation status of the habitats and species for which the SAC are designated include:</p> <ul style="list-style-type: none"> - Inappropriate behaviour by some visitors (e.g. collection and removal of dead wood) - Habitat fragmentation - Invasive species (specifically oak processionary moth <i>Thaumetopoea processionea</i>) - Atmospheric pollution (nitrogen deposition)
<p>Lee Valley SPA and Ramsar</p>	<p>Avoid the deterioration of the habitats of the qualifying features, and the significant disturbance of the qualifying features, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving the aims of the Birds Directive.</p> <p>Subject to natural change, to maintain or restore:</p> <ul style="list-style-type: none"> - The extent and distribution of the habitats of the qualifying features; - The structure and function of the habitats of the qualifying features; - The supporting processes on which the habitats of the qualifying features rely; - The populations of the qualifying features; 	<p>The Walthamstow Reservoirs SSSI has the same boundary as the Lee Valley SPA and Ramsar. The SSSI condition assessment report by Natural England (December 2014) has recorded the SSSI as being in an “unfavourable recovering” condition. This reports a slight fall in the number of breeding grey heron and tufted duck. Wintering cormorant, shoveler and tufted duck and breeding pochard remain favourable. However, the condition assessment report states that the site is in good condition and the fall in numbers is no reflection of site management. This indicates that the species which are qualifying features for the SPA and Ramsar remain favourable. No mention is made of bittern.</p> <p>The potential threats to the site which could influence the conservation status of the species for which the SPA is designated include:</p> <p>Maintenance of water levels and water quality;</p>

European Site	Conservation Objectives	Condition Assessment and factors influencing conservation status
	- The distribution of the qualifying features within the site.	Impacts associated with recreational activities; Maintenance of mosaic of habitat types to provide refuge, foraging, breeding etc. opportunities for the species that use the site.

3.2 Vulnerabilities

- 3.2.1 All of the European sites listed in **Table 3.2** above lie outside of the boundary of the Isle of Dogs and South Poplar Opportunity Area ('the OA'). Therefore, potential effects associated with the OAPF are those where links can be made between activities resulting from the OAPF and the vulnerabilities of the interest features of the European sites in adjacent boroughs.
- 3.2.2 Taking into account the qualifying features of the European sites, their condition and conservation objectives (set out in the preceding section) and the most likely issues arising from a land use plan, the key issues that could result in a potential effect on the European sites within the zone of influence of the OAPF are most likely to be those associated with the following vulnerabilities for each European site.

Table 3.3: European Site Vulnerabilities

European site	Potential effects associated with the OAPF
Epping Forest SAC	Habitat loss/damage from recreation pressures; air pollution issues (deposition of nitrogen).
Richmond Park SAC	Air pollution issues (deposition of nitrogen)
Wimbledon Common SAC	Air pollution issues (deposition of nitrogen)
Lee Valley SPA and Ramsar	Disturbance of birds from recreation and/or development pressures; water level and water quality issues.

4 Screening Assessment

4.1 Overview

4.1.1 Building upon the initial coarse screening exercise presented in **Section 3**, which identified European sites in the zone of influence to the OAPF and their associated vulnerabilities, this section presents a further screening assessment of the substantive components of the OAPF to identify any potential for significant effects on these European sites.

4.2 Potential Effects of the OAPF

4.2.1 Drawing upon IIAs carried out for the higher level emerging London Plan and LBTH Local Plan, the subsections below consider potential effects from the OAPF on the vulnerabilities of relevant European sites. Detailed consideration of potential effects from each substantive component of the OAPF on relevant European sites is then provided in **Table 4.1** below.

4.2.2 The higher level IIA (including HRA) of the Draft LBTH Local Plan (2017) identified the most common reasons for an 'unfavourable' condition assessment of the component SSSI units of the European Sites which could potentially be affected by the OAPF as effects associated with public access; air pollution; and inappropriate management of some form (e.g. over- or undergrazing, scrub control, water-level management etc.). Whilst significant effects were considered unlikely due to distance and appropriate development controls; potential effects on nearby European Sites focussed on increased visitor pressure due to the provision of additional housing, and effects due to air pollution arising from increased traffic emissions. This approach has been taken forward for use in this HRA Screening Assessment of the OAPF.

Overview

4.2.3 There are no European Sites within the OA; the nearest is 7.2km away. Direct effects will not occur and the potential for indirect effects is therefore limited due to distances involved and the implementation of appropriate development controls identified in the Draft LBTH Local Plan (2017). Nevertheless, consideration has been given for the potential effects as a result of increased visitor pressure due to the provision of additional housing and development pressure, and reduced air quality arising from increased traffic emissions associated with the OAPF.

4.2.4 Given the distances involved, and the absence of impact pathways, the OAPF is considered unlikely to have any effects on the sensitivities of Richmond Park SAC and Wimbledon Common SAC. They are therefore not considered any further in this impact assessment; this approach was agreed with Natural England when consulted on the higher level IIA (including HRA) of the Draft LBTH Local Plan (2017). Similarly, given the distances involved, and the nature of the OAPF, no effects in relation to changes in water levels and water quality on Lee Valley SPA and Ramsar are considered likely.

Epping Forest SAC and Lee Valley SPA and Ramsar both support qualifying features which are potentially vulnerable to the effects of visitor pressure, and the sensitive bryophyte communities supported within Epping Forest SAC are vulnerable to a reduction in air quality. Given that reasonable impact pathways exist between these European Sites and OAPF area, these are considered in more detail below. Relevant information from the higher level assessments of the HRA the Draft London Plan (AECOM, 2017), and the IIA (including HRA) of the emerging LBTH Local Plan (AFW, 2017) has also been included, as appropriate.

Increased recreational pressure

- 4.2.5 The Draft LBTH Local Plan (2017) identifies the borough (including the Isle of Dogs and South Poplar) as the second most densely populated borough in London, and the London Plan 2015 allocates the highest target for housing to the LBTH. The Canary Wharf Biodiversity Action Plan (BAP) also identifies development pressure as a key threat to priority habitats and species in the area. Objectives within the Canary Wharf BAP to support local and national biodiversity targets, and to provide and maintain habitats suitable for priority species seek to address this risk. Similarly, there is an over-arching objective in the Tower Hamlets BAP to ensure that potential effects on these habitats and species are given due consideration in planning applications, with specific targets to protect and enhance habitats and features which support priority species.
- 4.2.6 Whilst development can directly affect biodiversity through habitat loss, it can also result in indirect effects such as changes in habitat composition and distribution, and disturbance to the species they support due to increased recreational pressure on nearby accessible areas of green space. In the Isle of Dogs and South Poplar area, the risk of adverse effects on biodiversity due to recreational pressure is compounded by a general lack of publically accessible open space. South Poplar and the western edge of the Isle of Dogs is identified in the Draft LBTH Local Plan (2017) as being 'nature deficient' i.e. that these areas are more than 1 km walking distance from an accessible wildlife site of at least 'Borough' importance. The Draft LBTH Local Plan (2017) states that new development will not be permitted to rely on nearby public open space, and that for large developments, the creation of new publically accessible open space will be required. Whilst there is no space available for the creation of an extensive area of open space (such as a new park), the Tower Hamlets Green Grid Strategy seeks to connect spaces and routes as a mechanism to enhance biodiversity in the borough.
- 4.2.7 The OAPF sets out the delivery of the 'baseline' housing growth target, i.e. a minimum of 31,000 new homes by 2041. The strategy will neither set new housing targets nor allocate housing sites. It will however test the delivery of existing affordable housing policy requirements (minimum 35% subject to viability). The provision of new housing is likely to result in increased populations in the Plan area once implemented. Whilst this could potentially increase visitor pressure on Epping Forest SAC and Lee Valley SPA and Ramsar, given the distances involved, any effects are likely to be limited. In addition, the Sustainability and Utilities Strategy of the OAPF will enhance green infrastructure provision, to make access to wildlife more publically accessible, which has the potential to divert visitor pressure from sensitive European Sites.
- 4.2.8 Furthermore, The Lee Valley Park Development Framework sets out what the Lee Valley Regional Park Authority (LVRPA) wants to achieve within the Lee Valley and how the LVRPA plan to balance competing demands. This provides commitment to the management of the Park to improve visitor access whilst protecting the biodiversity interest of the Park; particularly those areas which lie within the Lee Valley Special Protection Area and Sites of Special Scientific Interest (LVRPA, 2010).
- 4.2.9 Similarly, the Epping Forest SAC is subject to a management plan which aims to maintain and enhance the ecological interest of each site. The Corporation of London own and manage Epping Forest. This management plans provide excellent information about the woodlands and identify the opportunities to encourage and facilitate use of the woodlands by the public without damaging their interest through the provision of informative displays, well-signed paths and literature.
- 4.2.10 Given the distances involved, the effective management of the sites in relation to minimising effects of visitor pressure, and the components of the OAPF relating to the Sustainability Strategy and improvements in green infrastructure, no likely significant effects relating to disturbance of the interest of the qualifying features of the Lee Valley SPA /Ramsar or Epping Forest SAC are anticipated, as a result of the OAPF, either alone or in combination.

Reduction in air quality

- 4.2.11 Locally, the Isle of Dogs Neighbourhood Plan identifies construction dust and vehicle emissions as a key environmental threat in the area. Furthermore, the LBTH is designated as an AQMA for Nitrogen Dioxide (NO₂) and Particulate Matter (PM₁₀). Air pollution can result in adverse effects on habitats and ecosystems due to changes in species composition and loss of sensitive plant species.
- 4.2.12 Air pollution effects are identified as being a particular vulnerability associated with Epping Forest SAC (Natural England, 2015). The main source of air pollution in the borough in which Epping Forest is located is road traffic, with levels of nitrogen dioxide being of particular concern. Epping Forest's epiphytic bryophyte population has been in decline due to the death of pollards, shading and pollution from acid rain. The reintroduction of pollarding and wood pasture management in the 1990s is helping to reverse the decline. The slow recovery can also be attributed to the reduction of atmospheric pollutants since the passing of the 1956 Clean Air Act. (JNCC, 2011). However, the concern remains that increased populations in the Isle of Dogs and South Poplar area, as a result of the OAPF, could result in increased traffic which has the potential to increase nitrogen dioxide outputs, decreasing air quality.
- 4.2.13 The Transport and Movement Strategy and linked Local Connections Plan of the OAPF is focussed on improving the road network design and to encourage a modal shift from private car to the use of public transport, and to promote walking and cycling as an alternative to using cars. Both of these measures will act to reduce outputs of nitrogen dioxide and other air pollutants from traffic sources, through encouraging a reduced reliance on cars. There is the potential for the focus on the delivery of improvement/delivery of sustainable public transport associated with new development, to be positive for air quality.
- 4.2.14 In any event, the Mayor's Transport Strategy includes proposals to improve air quality, and will result in 'Traffic reduction and improvements in vehicle technology [leading to] large scale reductions of 94 per cent in NO_x' by 2041. The Policy Sustainable Infrastructure 1 Improving Air Quality within the New Draft London Plan (2017) states that large scale redevelopment areas, such as Opportunity Areas should achieve air quality neutral. In addition, Policy D.ES2 'Air Quality' of the Draft LBTH Local Plan (2017) ensures that project level air quality impact assessments will need to consider potential impacts on European sites, particularly on Epping Forest SAC and the potential effects through consequent increases in traffic volumes outside the LPA area.
- 4.2.15 Given these measures and the strategies outlined in the OAPF, no likely significant effects on the vulnerabilities of Epping Forest SAC are anticipated, either alone or in combination. Further consideration of potential effects from each substantive component of the is provided in **Table 4.1** below.

Table 4.1 OAPF Screening Assessment

Substantive Component	Summary of SEA Screening Findings	Relationship with other Plans and Policies	Likely Significant Effects
<p>1. OAPF Objectives</p>	<p>Due to their high level and aspirational nature, the OAPF Objectives will serve as hooks to underpin individual thematic and area strategies (see below), rather than directly influencing development. As such, their potential to result in clear environmental effects is limited.</p> <p>However, read together the objectives could indirectly result in positive effects on overall environmental quality, accessibility and social infrastructure provision through creating a framework to address these issues.</p>	<p>The proposed OAPF Objectives respond to existing policy requirements for the OA, as detailed in Section 2 above. They also align with and seek to implement the high level spatial strategy and principles for the Isle of Dogs OA set out in Part 4 of the emerging LBTH Local Plan (2017).</p> <p>The IIA of the Draft LBTH Local Plan (2017) already identified likely significant effects from these principles on sustainability objectives relating to liveability, housing, transport, economic growth, town centres, urban design and biodiversity. The OAPF Objectives would support the implementation of relevant principles identified within Part 4 of the LBTH Local Plan (October 2017) and would therefore strengthen previously predicted effects.</p>	<p>No Likely Significant Effect</p> <p>As recognised in the HRA for the Draft London Plan (2017), the regeneration of existing communities and boroughs and the promotion of integration and community cohesion do not affect European sites.</p>
<p>2. Housing Strategy</p>	<p>The identification of residential character areas across the OA would guide development to locations appropriate for the proposed density and housing type, resulting in positive effects on placemaking through the creation of locally distinctive neighbourhoods. It would also support the provision of a range and mix of housing to meet identified needs and ensure at least the 'baseline' expected growth in housing can be accommodated within the OA by 2041, resulting in positive effects on population (an environmental factor as defined within Schedule 2 of the SEA Regulations).</p> <p>Combined with evidence from the IoD&SP DIFS, this component indicates that the existing higher level policy requirement to deliver a minimum of 35% affordable housing in new residential developments should be achievable across the</p>	<p>This component of the OAPF would help to implement higher level existing and emerging policies regarding housing delivery, all of which have already been subject to SA incorporating SEA:</p> <ul style="list-style-type: none"> The IIA Report for the Further Alterations to the London Plan (2014), which subsequently resulted in the current London Plan (2015), predicted significant beneficial effects from that Plan on the provision of housing, in particular through requiring Boroughs to allocate sufficient housing sites to meet needs and setting updated affordable housing targets. The IIA Report for the emerging LBTH Local Plan (2017) concluded that Policies S.H1 and D.H2 - D.H7 would result in Major Positive and significant effects on sustainability objectives including equality, liveability, health and 	<p>No Likely Significant Effect</p> <p>Given the distances involved from the European Sites, and the focus on the delivery of improvement/delivery of sustainable public transport associated with new development, which will be positive for air quality. It can be concluded that this component could be delivered without likely significant effects, and may have positive air quality effects.</p>

Substantive Component	Summary of SEA Screening Findings	Relationship with other Plans and Policies	Likely Significant Effects
	<p>OA. This finding would indirectly support the delivery of at least 35% affordable housing by reducing uncertainty regarding the viability of provision at this level. As such the component could indirectly result in positive effects on population through helping to deliver mixed tenure residential developments and sufficient affordable housing to meet identified needs.</p>	<p>wellbeing, housing, economic growth and open space. Such effects were predicted as the policies set out criteria to ensure adequate provision of suitable housing across the Borough to meet identified needs, support sustained increases in housing building and require all residential development proposals to be well-designed and sustainable. In relation to affordable housing, Policy S.H1 sets an overall target of 50% of all new homes in the Borough to be affordable, with a minimum requirement to deliver 35% affordable housing subject to viability.</p> <ul style="list-style-type: none"> The IIA Report for the emerging LBTH Local Plan (2017) concluded that Policies S.DH1 - 10 would result in Major Positive and significant effects on the design and heritage placemaking objective by requiring all development proposals to achieve high design and placemaking standards and positively contribute to townscape character. <p>This component of the OAPF would build upon these existing and emerging higher level policies by setting out a delivery plan to support the delivery of a range of housing in appropriate locations to meet identified needs within the OA, without allocating new sites or setting new targets. It would also indirectly assist with the implementation of the LBTH level requirement for residential developments to include a minimum of 35% affordable housing. As such the OAPF would strengthen previously identified beneficial and significant environmental effects from higher level plans.</p>	

Substantive Component	Summary of SEA Screening Findings	Relationship with other Plans and Policies	Likely Significant Effects
<p>3. Centres and Employment Strategy</p>	<p>The identification of specific employment areas within the OA would guide development to locations appropriate for the proposed density and employment type. This would assist the delivery of substantial new employment without creating land use conflict, protect the global business function of Canary Wharf and the provision of office space within the Northern Isle of Dogs area (as defined within the Draft London Plan (2017)). This component of the OAPF would therefore have positive effects on population in terms of helping to increase and diversify employment opportunities, including for local residents.</p> <p>More widely, through directing types of employment proposals to specific areas and providing building density guidance, the strategy would also result in positive agglomeration and placemaking effects.</p> <p>The support provided by this strategy for expanded retail and service provision in Canary Wharf, as a Metropolitan Centre, and the development of a new District Central at Crossharbour, would help to expand the range of amenities and employment opportunities provided in highly accessible locations to meet existing and future population needs. This would therefore have positive effects on population in terms of enhancing local access to a range of retail offers, services and employment opportunities.</p>	<p>This component of the OAPF would help to implement higher level existing and emerging policies regarding protecting and increasing employment opportunities, all of which have already been subject to SA incorporating SEA:</p> <ul style="list-style-type: none"> The IIA Report for the emerging LBTH Local Plan (2017) concluded that Policies S.EMP1 and D.EMP2 – D.EMP 4 would result in Major Positive and significant effects on sustainability objectives including transport, employment, economic growth and equality. Such effects were predicted as these policies identify Canary Wharf as a Preferred Office Location, set out criteria to support the provision of additional employment opportunities, direct employment uses to specific areas and prevent the loss of employment or industrial space. However, the Report noted the potential for uncertainties to arise in terms of how the GLA’s target of creating 125,000 additional jobs in the Borough by 2031 can be achieved. Policy S.TC1 within the emerging LBTH Local Plan (2017) already proposed to designate Canary Wharf as a Metropolitan Centre and Crossharbour as a District Centre, and set out criteria requiring the provision of a range of retail, leisure and civic uses in both. Further, the IIA Report for the emerging LBTH Local Plan (2017) concluded that Policies S.CF1 – S.CF3 would have Major Positive and significant effects on a range of sustainability objectives (including liveability, equality, health and transport) as they set out criteria directing proposals for community facilities to highly 	<p>No Likely Significant Effect</p> <p>Whilst it is recognised that there is the potential for impacts on European Sites as a result of atmospheric pollution, this component encourages local office development that can capitalise sustainable public transport, with the potential to reduce atmospheric pollution.</p>

Substantive Component	Summary of SEA Screening Findings	Relationship with other Plans and Policies	Likely Significant Effects
		<p>accessible locations including designated centres.</p> <p>This component of the OAPF would build upon these emerging higher level policies by safeguarding Canary Wharf as a global employment hub, setting out a delivery plan to support the delivery of up to 110,000 new jobs and develop major centres (Canary Wharf and Crossharbour) within the OA, all without allocating new sites, setting new targets or detailing new policy requirements. By demonstrating how 110,000 jobs can be delivered, the OAPF would strengthen previously identified beneficial and significant environmental effects from the emerging LBTH Local Plan (2017) without resulting in any new or different significant effects itself. This component would also help to reduce the previously identified uncertainty at LBTH level regarding the delivery of the GLA's employment creation target for the Borough.</p>	
<p>4. Transport and Movement Strategy with linked Local Connections Plan</p>	<p>The package of proposed transport projects/interventions identified in this component is designed to enhance permeability and connectivity, both within the OA and to/from external destinations. The measures would also prioritise sustainable and active travel modes.</p> <p>As such, this component would directly contribute to increasing accessibility and reducing greenhouse gas emissions from the transport sector, whilst also indirectly contributing to improved physical health outcomes. The component therefore has the potential to generate positive transport, economic growth, climate change mitigation and health effects.</p>	<p>This component of the OAPF would help to implement higher level policies and proposals regarding the functioning of the transport network, all of which have already been subject to SA incorporating SEA:</p> <ul style="list-style-type: none"> The IIA Report for the emerging LBTH Local Plan (2017) concluded that Policies S.TR1 – 4, which have been prepared in conformity with the current London Plan (2015), would result in Major Positive and significant effects on sustainability objectives relating to equality, liveability, health & wellbeing, transport, economic growth, town centres, climate change and natural resource usage. These higher level policies require development proposals to safeguard, develop and enhance the transport network, commit to public transport 	<p>No Likely Significant Effect</p> <p>This component promotes walking and cycling, which can potentially lead to air quality improvements through reduced reliance on cars. It positive provision that has the potential to reduce atmospheric pollution via the need for connectivity and accessibility to public transport, thus reducing the need for travel by car.</p>

Substantive Component	Summary of SEA Screening Findings	Relationship with other Plans and Policies	Likely Significant Effects
		<p>improvements and require integration between developments and public transport.</p> <ul style="list-style-type: none"> Paragraph 11.14 and Figure 18 within the emerging LBTH Local Plan (2017) identify strategic transport projects which will be supported by the Borough. Of relevance to this component of the OAPF, this includes new river piers, new cycle infrastructure, new pedestrian and cycle connections, DLR enhancements and the proposed Canary Wharf – Rotherhithe bridge. The policy support provided for these interventions has already been assessed through the IIA of the emerging LBTH Local Plan (2017). The IIA Report for the Draft London Plan (2017) concluded that policy T2, which supports the implementation of the Mayor’s Healthy Streets initiative and sets out criteria to promote sustainable and active travel, would have Minor Positive and not significant effects on a range of sustainability objectives. Policy T3, which sets out criteria to protect and enhance public transport networks and provides support for an indicative list of transport schemes listed in Table 10.1 of the Plan, is also predicted to result in Minor and Not Significant Effects on a range of sustainability objectives. Of relevance to this component of the OAPF, the indicative list of proposed transport schemes identified in Table 10.1 of the Draft London Plan (2017) include Healthy Streets and active travel projects, cycle network development, increased street tree planting, highway decking, wayfinding improvements, DLR upgrades and the proposed Canary Wharf 	

Substantive Component	Summary of SEA Screening Findings	Relationship with other Plans and Policies	Likely Significant Effects
		<p>– Rotherhithe pedestrian and cycle bridge. Each of these proposals has therefore already been considered within the higher level IIA of the Draft London Plan (2017).</p> <p>This component of the OAPF would build upon these higher level policies by demonstrating how planned transport projects/interventions could be delivered spatially and how connectivity can be enhanced within the OA. Of note, this component does not propose any new or different transport projects not previously proposed in higher level plans (London Plan or LBTH Local Plan levels). This limits the ability of this component to result in new or different effects beyond reinforcing those previously identified in relation to proposed transport projects at higher levels.</p>	
<p>5. Social and Community Infrastructure Strategy</p>	<p>This component would ensure that adequate provision of social and community infrastructure can be provided within the OA to tackle existing inequalities and accommodate a growing population. This would have positive effects on population, both in terms of facilitating expected population growth over the period to 2041 and meeting the infrastructure needs of existing and future populations to allow them to flourish. As such this component could indirectly have positive effects on educational attainment, health and socio-economic outcomes within the OA.</p>	<p>This component of the OAPF would help to implement higher level policies and proposals regarding protection and enhancement of social and community infrastructure, all of which have already been subject to SA incorporating SEA:</p> <ul style="list-style-type: none"> • The IIA Report for the Further Alterations to the London Plan (2014), which subsequently resulted in the current London Plan (2015), predicted that the Plan would result in Minor Positive and not significant effects on population through extending policy requirements for specific types of infrastructure provision to support development proposals. • The emerging LBTH Local Plan (2017) defines “community facilities” as including health, social, educational, leisure and sport facilities. The associated IIA Report concludes that Policies S.CF1 – S.CF3 are predicted to have Major Positive and significant effects on a range of 	<p>No Likely Significant Effect</p> <p>This component provides guidance relating to community infrastructure. No development type, quantum or location is provided.</p>

Substantive Component	Summary of SEA Screening Findings	Relationship with other Plans and Policies	Likely Significant Effects
		<p>sustainability objectives (including liveability, equality, health and transport) as they set out criteria requiring all development proposals to protect existing community facilities and direct new community facilities to highly accessible locations. As such, these higher level policies would act to reduce social exclusion, ensure adequate access to social infrastructure and link community facilities with sustainable transport provision.</p> <p>This component of the OAPF would build upon these higher level policies by identifying the social and community infrastructure improvements needed to support future expected growth, without allocating specific sites for infrastructure or deviating from developer contribution requirements set out in higher level policies (principally the existing and emerging LBTH Development Plan). As such, this component of the OAPF would strengthen previously identified beneficial environmental effects from higher level plans.</p>	
<p>6. Sustainability and Utilities Strategy</p>	<p>The high level sustainability and green infrastructure objectives in this component of the OAPF would indirectly ensure all development proposals protect and enhance environmental quality. However, owing to their high level nature they would have no clear and specific environmental effects.</p> <p>The inclusion of green infrastructure considerations for all development proposals in the OA would have direct and positive environmental effects in terms of protecting and enhancing ecological features, improving access to nature, increasing natural flood storage</p>	<p>This component of the OAPF would help to implement higher level policies and proposals (all of which have already been subject to SA incorporating SEA) to promote placemaking, ensure development proposals are environmentally sustainable, enhance green infrastructure provision and provide adequate utilities infrastructure to accommodate expected growth:</p> <ul style="list-style-type: none"> The IIA Report for the Further Alterations to the London Plan (2014), which subsequently resulted in the current London Plan (2015), predicted that the Plan would result in Minor Positive and not significant environmental effects through setting out additional policies to support the delivery of upgraded utility networks (primarily gas and electricity). The emerging 	<p>No Likely Significant Effect</p> <p>The high level sustainability and green infrastructure objectives will be focussed around improving all aspects of environmental quality; this would be expected to have positive effects on air quality.</p>

Substantive Component	Summary of SEA Screening Findings	Relationship with other Plans and Policies	Likely Significant Effects
	<p>capacity and improving health outcomes through providing opportunities for physical recreation.</p> <p>The identification of existing utility infrastructure constraints and the need for network upgrades (including telecommunications) would indirectly support the provision of enhanced infrastructure to accommodate expected growth in the OA. However, as the utilities element of this strategy is limited to explaining how types of utility infrastructure could be enhanced, rather than defining specific policies or infrastructure proposals, this would be non-substantive and thus would not result in any clear environmental effects.</p>	<p>LBTH Local Plan (2017) has been prepared in conformity with these policies.</p> <ul style="list-style-type: none"> The IIA Report for the emerging LBTH Local Plan (2017) concluded that Policies S.OWS1 – 3, which have been prepared in conformity with the current London Plan (2015), would have Major Positive and significant effects on sustainability objectives relating to equality, liveability, health & wellbeing, transport, open spaces, biodiversity, natural resources, flood risk and soil. These likely significant effects were predicted as the policies set out criteria to protect, development and enhance access to, and the quality of, open spaces across the Borough. Of particular is Policy S.OWS1, which identifies areas within the OA where open space should be enhanced: Blackwell, Cubitt Town, Canary Wharf and Poplar. The IIA Report for the emerging LBTH Local Plan (2017) also concluded that Policies S.DH1 - 10 would result in Major Positive and significant effects on the design and heritage placemaking sustainability objective by requiring all development proposals to achieve high design and placemaking standards, protect amenity, improve public realm and positively contribute to townscape character. In particular, Policy D.DH6 sets out design requirements for tall buildings, directs such proposals to Tall Building Zones (including Canary Wharf, Millwall Inner Dock and Blackwall) and requires proposals to accord with design principles for each zone. <p>This component of the OAPF would build upon these higher level current and emerging policies by identifying</p>	

Substantive Component	Summary of SEA Screening Findings	Relationship with other Plans and Policies	Likely Significant Effects
		<p>locally specific sustainability and green infrastructure considerations which should be incorporated into development proposals. It would also help to implement higher-level policy requirements to improve public realm and increase the quality and quantity of public open space within the OA, as well as helping to address utilities infrastructure constraints. As such, this component of the OAPF would strengthen previously identified beneficial environmental effects from higher level plans.</p> <p>Of note, whilst the majority of the OA lies within Flood Zone 3 (as defined by the Environment Agency) the OAPF will not include a detailed flood risk management strategy on the basis that this is being taken forward in separate Riverside Strategies. Combined with existing and emerging flood risk policy requirements set out in higher level plans, it can therefore be assumed that the OAPF would itself have no specific effect on flood risk vulnerabilities within the OA.</p>	
<p>7. Emerging Visions for Areas of Change</p>	<p>Due to their high level and aspirational nature, these emerging visions will serve as hooks to underpin individual Area of Change spatial strategies (see below), rather than directly influencing development. As such, whilst in general terms each place specific vision seeks to enhance environmental quality, there are no clear and specific effects from this component itself.</p>	<p>It should be noted that higher level plans already direct development to OAs, in particular Policy S.SG1 within the emerging LBTH Local Plan (2017). This policy also requires development proposals to demonstrate how they address the relevant OA's priorities and principles, meaning that these Areas of Change emerging visions and subsequent spatial strategies (see below) would indirectly help to implement the LBTH level policy through articulating relevant spatial priorities.</p> <p>The IIA Report for the emerging LBTH Local Plan (2017) concluded that Policy S.SG1 would result in Minor Positive and not significant effects on sustainability objectives relating to equality, liveability and open space through directing development to locations with good accessibility and requiring development to help deliver key infrastructure. As this component of the OAPF would</p>	<p>No Likely Significant Effect</p> <p>Due to their high level and aspirational nature, these emerging visions will serve as hooks to underpin individual Area of Change spatial strategies (see below), rather than directly influencing development. No development type, quantum or location is provided.</p> <p>Together they include proposals for sustainable transport, new improved public</p>

Substantive Component	Summary of SEA Screening Findings	Relationship with other Plans and Policies	Likely Significant Effects
		help to implement Policy S.SG1 it would indirectly strengthen these previously identified beneficial effects.	realm and connectivity, and creation of leisure facilities.
8. Area of Change Strategy - Blackwell	This spatial strategy simply draws together individual elements from the above thematic strategies which apply to the Blackwell Area of Change. As such, this component would not result in any new or different environmental effects not already identified above.	Given the absence of any potential environmental effects from this component, it would not result in any likely significant effects. As above, this component would however support the implementation of Policy S.SG1 within the emerging LBTH Local Plan (2017), as well as other higher level policies relating to each of the OAPF's thematic strategies. This component would therefore strengthen previously identified beneficial effects from higher level plans.	This has the potential to have positive effects on air quality, and to divert visitor pressure away from European sites.
9. Area of Change Strategy – South Poplar	This spatial strategy simply draws together individual elements from the above thematic strategies which apply to the Blackwell Area of Change. As such, this component would not result in any new or different environmental effects not already identified above.	Given the absence of any potential environmental effects from this component, it would not result in any likely significant effects. As above, this component would however support the implementation of Policy S.SG1 within the emerging LBTH Local Plan (2017), as well as other higher level policies relating to each of the OAPF's thematic strategies. This component would therefore strengthen previously identified beneficial effects from higher level plans.	
10. Area of Change Strategy – Canary Riverside	This spatial strategy simply draws together individual elements from the above thematic strategies which apply to the Blackwell Area of Change. As such, this component would not result in any new or different environmental effects not already identified above.	Given the absence of any potential environmental effects from this component, it would not result in any likely significant effects. As above, this component would however support the implementation of Policy S.SG1 within the emerging LBTH Local Plan (2017), as well as other higher level policies relating to each of the OAPF's thematic strategies. This component would therefore strengthen previously identified beneficial effects from higher level plans.	

Substantive Component	Summary of SEA Screening Findings	Relationship with other Plans and Policies	Likely Significant Effects
<p>11. Area of Change Strategy – South Quay</p>	<p>This spatial strategy simply draws together individual elements from the above thematic strategies which apply to the Blackwell Area of Change. As such, this component would not result in any new or different environmental effects not already identified above.</p>	<p>Given the absence of any potential environmental effects from this component, it would not result in any likely significant effects. As above, this component would however support the implementation of Policy S.SG1 within the emerging LBTH Local Plan (2017), as well as other higher level policies relating to each of the OAPF's thematic strategies. This component would therefore strengthen previously identified beneficial effects from higher level plans.</p>	
<p>12. Area of Change Strategy – Millwall Waterfront</p>	<p>This spatial strategy simply draws together individual elements from the above thematic strategies which apply to the Blackwell Area of Change. As such, this component would not result in any new or different environmental effects not already identified above.</p>	<p>Given the absence of any potential environmental effects from this component, it would not result in any likely significant effects. As above, this component would however support the implementation of Policy S.SG1 within the emerging LBTH Local Plan (2017), as well as other higher level policies relating to each of the OAPF's thematic strategies. This component would therefore strengthen previously identified beneficial effects from higher level plans.</p>	

5 Conclusion

- 5.1.1 This HRA Screening Report has assessed the potential for effects on five European sites within 15km of the Isle of Dogs/ South Poplar area: Epping Forest SAC, Richmond Park SAC, Wimbledon Common SAC, Lee Valley SPA and Lee Valley Ramsar, associated with the OAPF.
- 5.1.2 With regard to the sites which have been considered, Richmond Park SAC and Wimbledon Common SAC will be unaffected due to the distances involved and absence of conceivable impact pathways.
- 5.1.3 Epping Forest SAC and Lee Valley SPA and Ramsar both support qualifying features which are potentially vulnerable to the effects of visitor pressure, and the sensitive bryophyte communities supported within Epping Forest SAC are vulnerable to a reduction in air quality, as a consequence of implementation of the OAPF. It is considered that these sites will only have limited risk associated with these effects due to the distances involved and the policies included in the LBTH Local Plan to protect and enhance air quality, and to ensure that project level air quality impact assessments consider potential impacts on European sites, particularly Epping Forest SAC and the potential effects through consequent increases in traffic volumes outside the LPA area. Similarly, the effective management of Epping Forest SAC and Lee Valley SPA in relation to minimising effects of visitor pressure, and the components of the OAPF relating to the Sustainability Strategy and improvements in green infrastructure, further reduce the likelihood of significant effects.
- 5.1.4 The OAPF provides an appropriate framework for future development and regeneration in the Isle of Dogs and South Poplar area, whilst avoiding the potential for likely significant effects on European sites. There is therefore no requirement for the Habitats Regulations Assessment process to further consider potential effects of the OAPF on European sites, as no likely significant effects are predicted.
- 5.1.5 This outcome is substantiated by the IIA for the Draft LTBH (AFW, 2017) which concluded that the Local Plan (including the Isle of Dogs and South Poplar Opportunity Area) is not likely to have any significant effects on any European Sites. Similarly, the outcome of the HRA for the Draft London Plan (AECOM, 2017) concludes that 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 with other plans and projects.

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