

**Olympic Legacy Supplementary Planning Guidance:  
Consultation Draft**

**Habitats Regulations Assessment Interim Screening  
Report**

**Prepared for Greater London Authority  
by  
Land Use Consultants**

**August 2011 V3**



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# I Introduction

## OVERVIEW

I.1 Land Use Consultants (LUC) was appointed by the Greater London Authority (GLA) as part of a Framework Contract to undertake a Habitats Regulations Assessment (HRA) of the Olympic Legacy Supplementary Planning Guidance (OLSPG). The HRA has comprised an iterative process with the review of the OLSPG Draft 5 (January 2011), Mayoral Draft (July 2011) and Consultation Draft (August 2011), with certain recommendations to protect the European Sites incorporated in to the Consultation Draft where possible. The HRA is required under The Conservation of Habitats and Species Regulations, 2010, to determine whether there may be any significant effects on European Sites designated for nature conservation in the area as a result of the OLSPG. The Legacy site includes four London Boroughs – Waltham Forest to the north, Hackney to the west, Newham to the east and Tower Hamlets to the south. The HRA considers Natura 2000 sites within 15km (**Figure I.1**) which include:

- **Lee Valley SPA and Ramsar site** extends north west from the Olympic development site. A second designated area of this watercourse follows the Hertfordshire-Essex border.
- **Epping Forest SAC** lies north east of the site in the London Borough of Waltham Forest, extending beyond the Greater London conurbation into Essex.

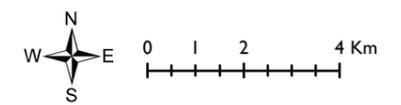
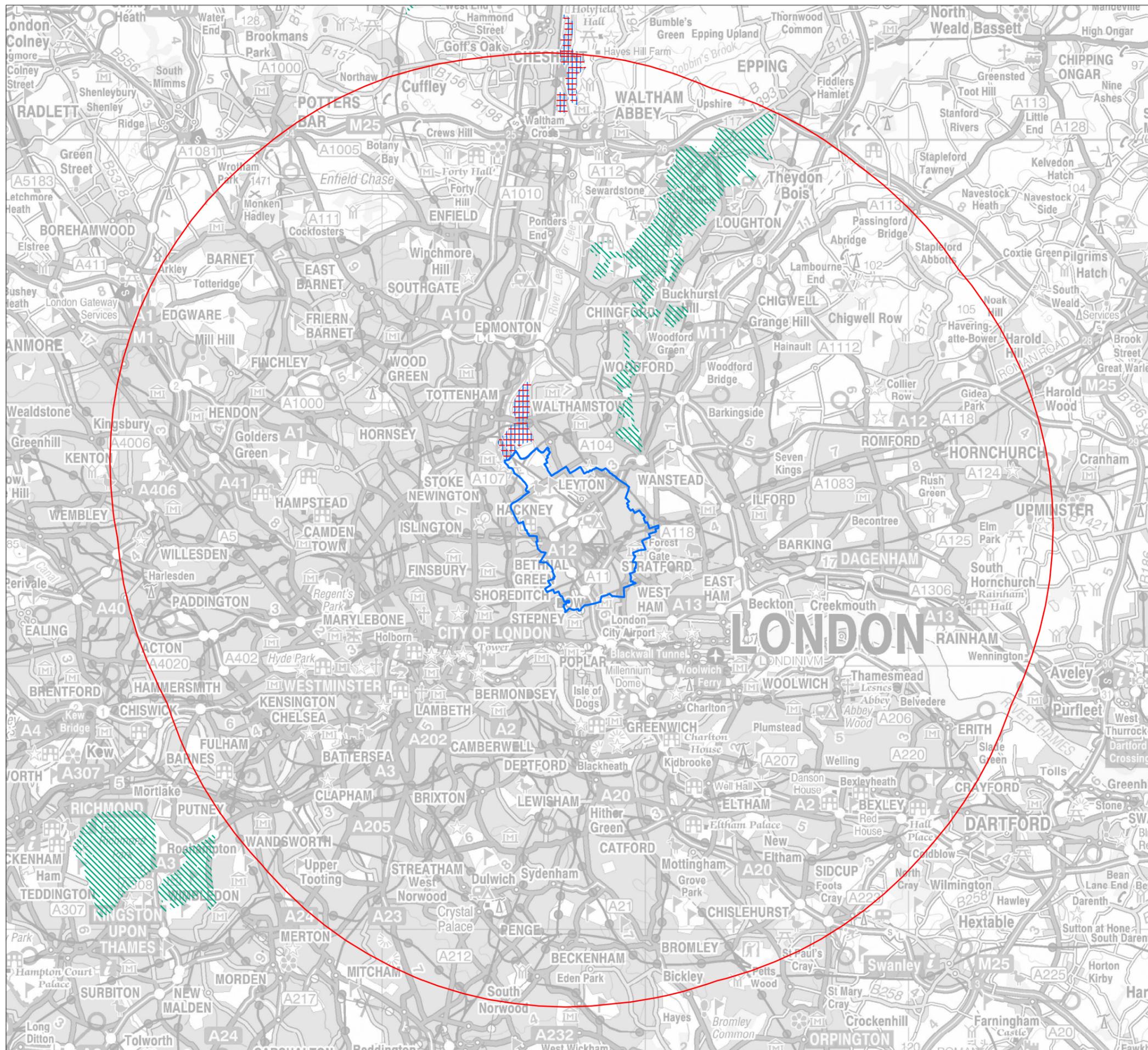


# Olympic Legacy SPG HRA

## Figure I.1 European sites within 15km of the Legacy area

### Key

-  OLSPG Boundary
-  15km buffer
-  SPA
-  SAC
-  Ramsar site



Source: Ordnance Survey/LUC

Date: 09/08/2011  
Revision: A





## THE REQUIREMENT FOR HRA

- 1.2 The completion of HRA of development plans is required by the Habitats Regulations 2010<sup>1</sup>. When preparing the OLSPG, the GLA is required by law to carry out an HRA.
- 1.3 HRA refers to the assessment of the potential effects of a development plan on one or more European Site, including Special Protection Areas (SPA), Special Areas of Conservation (SAC) and Ramsar sites:
- **SPA sites** are classified under the European Birds Directive 79/409/EEC<sup>2</sup> for the protection of wild birds and their habitats, including particularly rare and vulnerable species (Annex I) and migratory species.
  - **SAC sites** are designated under the Habitats Directive 92/43/EEC<sup>3</sup> and target particular habitats (Annex I) and/or species (Annex II) identified as being of European importance.
  - **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).
- 1.4 For ease of reference, these three designations are collectively referred to as European Sites, despite Ramsar designations being at the international level. Current national planning policy also expects potential SPA sites (pSPA), candidate SAC sites (cSAC) and Ramsar sites to be included within the assessment (ODPM, 2005). In addition, the draft National Planning Policy Framework (DCLG, July 2011) states that *development likely to have a significant effect on sites protected under the Birds and Habitats Directives would not be sustainable under the terms of the presumption in favour of sustainable development*.
- 1.5 HRA is usually undertaken in stages (see **Table I.1**) and should conclude whether or not a proposal or policy in a development plan would adversely affect the integrity of the European site in question. This is judged in terms of the implications of the plan for a site's 'qualifying features', i.e. the Annex I habitats, Annex II species, and Annex I bird populations for which it has been designated. Significantly, HRA is based on a rigorous application of the precautionary principle and therefore requires those undertaking the exercise to prove that the plan will not have an adverse effect on the site's integrity. Where uncertainty or doubt remains, an adverse impact should be assumed.

### Stages in HRA

- 1.6 **Table I.1** summarises the stages involved in carrying out a full HRA.

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<sup>1</sup> The Conservation of Habitats and Species Regulations 2010 (SI No. 2010/490).

<sup>2</sup> Council Directive 79/409/EEC on the conservation of wild birds. Codified version – 2009/147/EC.

<sup>3</sup> Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora

**Table I.1: Stages in HRA**

Stage	Task	Outcome
<b>Stage 1:</b> Screening	Description of the plan Identification of potential effects on European Sites Assessing the effects on European Sites	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	Gather information (plan and European Sites) Impact prediction Evaluation of impacts in view of conservation objectives Where impacts considered to affect qualifying features, identify alternative options Assess alternative options If no alternatives exist, define and evaluate mitigation measures where necessary	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 through, firstly, avoidance, and secondly, mitigation 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) 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

Sources: ECEDG (2001), DCLG (2006) and RSPB (2007).

- 1.7 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' are likely to be justified only very occasionally and would involve engagement with both the Government and European Commission.
- 1.8 The HRA should be undertaken by the 'competent authority'; in this case the GLA, and LUC has been commissioned to do this on their behalf. Under Regulation 4 of the Conservation (Natural Habitats, &c.) (Amendment) Regulations 2007, HRA also requires close working with Natural England as the statutory nature conservation body in order to obtain the necessary information, agree the process, outcomes and mitigation proposals.

## A SUMMARY OF THE OLSPG

### Vision

- 1.9 The OLSPG covers the period 2011 to 2031 and sets out how the Mayor of London envisages future development in and around the Legacy site following the 2012 Games to secure long-term regeneration. The vision of the OLSPG is as follows:

#### OLSPG Vision (Consultation Draft extract)

### A great part of a great city

#### In 2030...

No longer is the area one which suffers from its industrial past, a place at the periphery of London, cut off from surrounding communities: a tear in London's urban fabric.

Today the investment triggered by the Olympic and Paralympic Games has not only created a successful, new part of London but also helped renew all of the communities that surround it.

Stratford is bustling with shoppers and office workers, busy with visitors from across London and the world. It is a destination and one of the best connected places in London – internationally, to the rest of the capital, and most importantly to the revitalised neighbourhoods around it.

Each of which has its own character. Hackney Wick and Fish Island are a lively mix of homes and new enterprises, in canalside apartments and revived Victorian yards. To the south, Bromley by Bow and Sugar House Lane combine to make a family-oriented neighbourhood straddling the Lea. On the north side of the park, Leyton and Leytonstone have new shops, new homes, and new links to Stratford.

At the heart of the whole area is the Queen Elizabeth Olympic Park. It's a great new space for London – linked north to the great open spaces of the Marshes, and south along the canals and towpaths of the 'Water City' towards the Thames. And within it, the Olympic Stadium and Aquatics Centre draw in thousands of people every week – they're part of the community, used by local children as well as top athletes.

**Twenty years after the Games, it's one of the best places in London to live and work: the best Legacy there could be from 2012.**

### Development principles

- 1.10 Six overarching **development principles** are identified to inform LPA plan making and to be applied to new developments within the Legacy site:

#### OLSPG Vision (Consultation Draft extract)

##### **A. Homes and communities**

*To help meet London's urgent need for new homes by creating a network of well-connected Lifetime Neighbourhoods across the OLSPG area as set out in this Guidance. These should be designed to meet the needs of existing and future communities, enable healthy and active lifestyles, maximise opportunities for family housing, promote*

*community cohesion, and provide access to employment opportunities, local shops and community and social infrastructure.*

**B. Business and employment**

*To promote Stratford as a new Metropolitan Centre, ensure land use change leads to a wide range of new business, training and employment opportunities across the OLSPG area, and to identify and protect sites needed for social infrastructure.*

**C. Connectivity and transport**

*To ensure that existing and new communities across the OLSPG area are linked by a network of strategic and more fine-grained local connections, to use the area's public transport infrastructure to achieve a lasting shift to more sustainable forms of transport and movement such as walking and cycling, and to minimise adverse impacts on the capacity and operation of the area's public transport and highway networks.*

**D. Urban form**

*To use the area's unique open spaces, waterways, heritage buildings and contemporary city scale architecture and sporting facilities to create a network of new linked, inclusively designed and revitalised Lifetime Neighbourhoods.*

**E. Sustainable development**

*To build on the sustainability infrastructure inherited from the 2012 Games, to promote and achieve exemplar standards of sustainable design and construction and environmental quality across the OLSPG area, and to create a new part of London which is ready to respond to the challenge of climate change.*

**F. Convergence**

*Planning applications that propose more than 100 residential units or 1,000 sq. m. of new floorspace or uses should include a statement setting out how they will help achieve the Convergence outcomes set out in Appendix 1 of this Guidance.*

1.11 Development principles A - E is applied through a series of targeted principles:

- A. Homes and Communities** – development principles A1 to A4
- B. Business and employment** – B1 to B5
- C. Connectivity and transport** – C1 to C3
- D. Urban form** – Key urban form proposals for key areas (incorporating Olympic Borough's urban design analysis)
- E. Sustainable Development** – E1 to E3

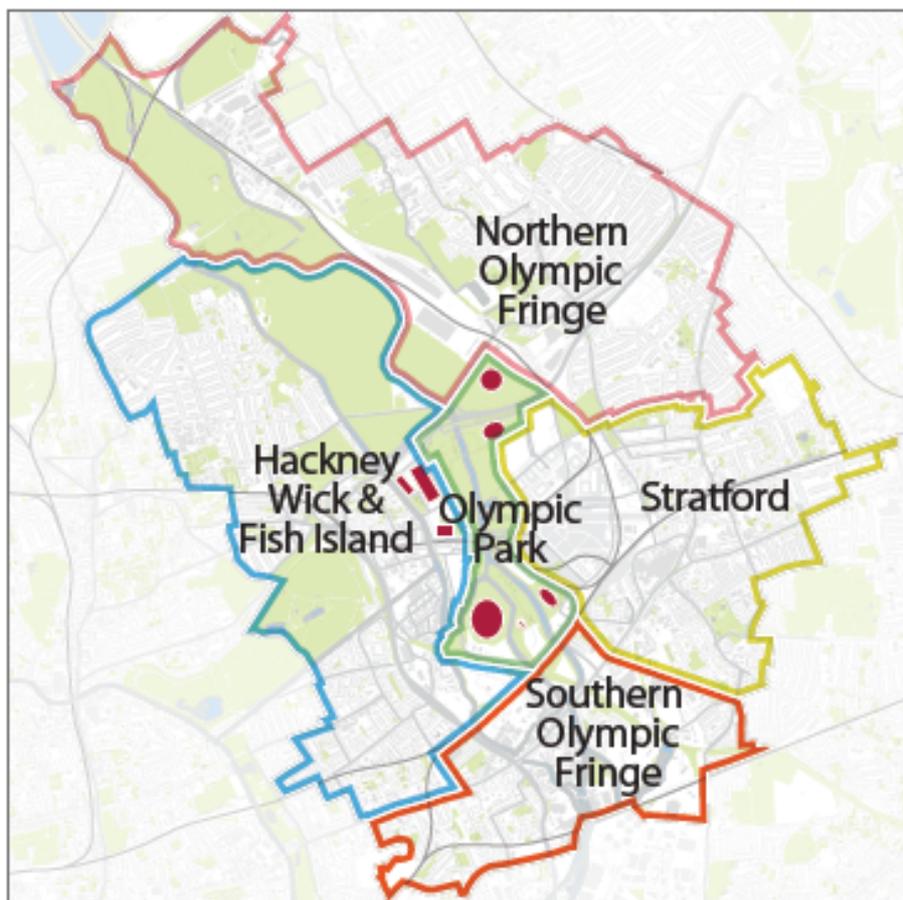
1.12 The **Development Principle F Convergence** relates to ensuring that residents of the area are provided with the same social and economic chances as provided elsewhere in London. It requires developments of a certain size/scale to set out how they will meet Convergence targets as set out in the Strategic Regeneration Framework prepared by the Olympic Host Borough's in 2009.

## Sub-areas

I.13 Five sub-areas are identified within the Legacy site:

- **Olympic Park** – The Queen Elizabeth Park will offer sporting, leisure, cultural and community activities within new open spaces, retained Olympic venues and visitor attractions.
- **Stratford** – a highly accessible metropolitan hub including Stratford city, railway station, athlete’s village, the Carpenter’s Estate and several significant educational institutions.
- **Southern Olympic Fringe** – existing neighbourhoods include canal frontage and heritage assets (the ‘water city’ character), although suffer from poor east-west connectivity.
- **Hackney Wick and Fish Island** – support strong creative and artistic industries to form a cultural hub in the east.
- **Northern Olympic Fringe** – encompasses substantial areas of open space with a built environment predominantly characterised by Victorian terraced housing.

**Figure I.2: OLSPG sub-areas (Consultation Draft extract)**



## Delivery

- I.14 The final part of the document sets out a strategic approach to delivering the Legacy. This recognises the complexity associated with revised political and administrative arrangements and unclear resourcing across the 20 year time frame. Significant strategic infrastructure is of heightened importance – including transport, community (schools, health provision, etc) and social (housing) elements.
- I.15 The GLA will prepare a **Delivery Study** to:
- Inform all delivery partners of the delivery actions and infrastructure provision.
  - Assist the host boroughs in local implementation, infrastructure planning and in preparation for the Community Infrastructure Levy.
  - Provide communities with transparent and accessible information to enable involvement in the development of their neighbourhood.

## POTENTIAL IMPACTS OF THE OLSPG ON EUROPEAN SITES

- I.16 **Table I.2** sets out the range of potential operations and associated impacts that development in general may have on European sites. These were considered when undertaking the screening exercise.

**Table I.2: Potential impacts and operations adversely affecting European sites**

Broad categories, and examples, of potential impacts on European Sites	Examples of operations responsible for impacts
<p><b>Physical loss</b></p> <ul style="list-style-type: none"> <li>- Removal (including offsite effects, e.g. foraging habitat)</li> <li>- Smothering</li> <li>- Habitat degradation</li> </ul>	<p>Development (e.g. housing, employment, infrastructure, tourism)</p> <p>Infilling (e.g. of water bodies)</p> <p>Cessation of or inappropriate management for nature conservation</p>
<p><b>Physical damage</b></p> <ul style="list-style-type: none"> <li>- Sedimentation / silting</li> <li>- Prevention of natural processes</li> <li>- Habitat degradation</li> <li>- Erosion</li> <li>- Trampling</li> <li>- Edge effects</li> <li>- Fragmentation</li> <li>- Severance / barrier effect</li> </ul>	<p>Flood defences</p> <p>Dredging</p> <p>Recreation (e.g. motor cycling, cycling, walking, water sports)</p> <p>Development (e.g. infrastructure, tourism, adjacent housing etc.)</p> <p>Vandalism and arson</p> <p>Cessation of or inappropriate management for nature conservation</p>
<p><b>Non-physical disturbance</b></p> <ul style="list-style-type: none"> <li>- Noise</li> <li>- Visual presence</li> <li>- Human presence</li> </ul>	<p>Development (e.g. housing, industrial)</p> <p>Recreation (e.g. dog walking, water sports)</p> <p>Industrial activity</p> <p>Navigation</p>

Broad categories, and examples, of potential impacts on European Sites	Examples of operations responsible for impacts
<ul style="list-style-type: none"> <li>- Light pollution</li> </ul>	Vehicular traffic Artificial lighting (e.g. street lighting)
<b>Water table/availability</b> <ul style="list-style-type: none"> <li>- Drying</li> <li>- Flooding / stormwater</li> <li>- Water level and stability</li> <li>- Changes in coastal water levels</li> <li>- Water flow (e.g. reduction in velocity of surface water)</li> <li>- Barrier effect (on migratory species)</li> </ul>	Water abstraction Drainage interception (e.g. reservoir, dam, infrastructure and other development) Coastal defences Increased discharge (e.g. drainage, runoff)
<b>Toxic contamination</b> <ul style="list-style-type: none"> <li>- Water pollution</li> <li>- Soil contamination</li> <li>- Air pollution</li> </ul>	Navigation Oil / chemical spills Tipping Domestic waste Vehicular traffic Industrial waste / emissions
<b>Non toxic contamination</b> <ul style="list-style-type: none"> <li>- Nutrient enrichment (e.g. of soils and water)</li> <li>- Algal blooms</li> <li>- Changes in thermal regime</li> <li>- Changes in turbidity</li> <li>- Air pollution (e.g. dust)</li> </ul>	Agricultural runoff Sewage discharge Water abstraction Industrial activity Flood defences Construction
<b>Biological disturbance</b> <ul style="list-style-type: none"> <li>- Direct mortality</li> <li>- Competition by non-native species</li> <li>- Selective extraction of species</li> <li>- Introduction of disease</li> <li>- Rapid population fluctuations</li> <li>- Natural succession</li> </ul>	Development (e.g. housing areas with domestic and public gardens) Predation by domestic pets Introduction of non-native species (e.g. from gardens) Fishing Changes in management practices (e.g. access controls, cutting / clearing)

## REPORT STRUCTURE

I.17 This chapter has introduced the OLSPG and the requirement to conduct HRA. The remainder of the report is set out in the following sections:

- **Chapter 2: Methodology** – Sets out the approach used and the specific tasks undertaken during Screening.
- **Chapter 3: HRA Screening Findings** – Summarises the key findings from the Screening stage.

- **Chapter 4: Recommendations and Conclusions** – Draws together the findings of the HRA to date and outlines recommendations.

## 2 Methodology

- 2.1 As introduced in **Table 1.1**, HRA generally involves three stages (Screening, Appropriate Assessment and Assessment where no alternatives exist). This section sets out our approach to the first stage of the HRA of the OLSPG which was undertaken in line with current available guidance and seeks to meet the requirements of the Habitat's Directive.

### STAGE 1: SCREENING

#### Identification of European Sites That May be Affected by the OLSPG

- 2.2 European Sites were identified within 15km of the Legacy site. This distance buffer was considered appropriate in accordance with Natural England draft guidance for HRA of development plans (2007). The attributes of the sites which contribute to and define their integrity were described, drawing on existing data such as the Standard Data forms for SAC and SPA sites and Information Sheets for Ramsar sites<sup>4</sup> (**Appendix I** and summarised in **Section 3**). The qualifying interest features and relevant conservation objectives of each site were identified from the collated data; and from this, the features that determine site integrity and the specific sensitivities of each site ascertained. Subsequent analysis was completed to identify potential effects that may result from the OLSPG on the integrity of each site.

#### Description of the OLSPG

- 2.3 A summary of the OLSPG has been provided in **Section 1**, along with an outline of the potential impacts that development in general can have on European Sites.

#### Identification of Other Plans and Projects Which May Have 'In Combination' Effects

- 2.4 Article 6(3) of the Habitats Directive requires an Appropriate Assessment of '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 plan or projects'. The first stage in identifying 'in combination' effects involved identifying which other plans and projects may be affecting the European Sites that were the focus of this assessment.
- 2.5 The review of other plans tried to identify any components that could have an impact on European Sites within the Legacy site and surrounds. Given the large number of potentially relevant plans and projects, this review focused on planned spatial growth identified in the Core Strategy for each of the four host boroughs and in the three London boroughs that adjoin the European Sites themselves, and HRAs for these plans if available (Redbridge, Waltham Forest, Hackney, Newham, Tower Hamlets, Enfield, Haringey). The London

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<sup>4</sup> These were obtained from the Joint Nature Conservation Committee and Natural England websites ([www.naturalengland.org.uk](http://www.naturalengland.org.uk) and [www.jncc.gov.uk](http://www.jncc.gov.uk))

Plan and its associated HRA was also reviewed as well as the Olympic Park HRA and proposals for the 'Fat Walk', south from the legacy area, as was the Joint Waste Development Plan Document for the East London Waste Authority Boroughs.

### **Assessment of the 'likely significant effects' of the OLSPG**

- 2.6 As required under Regulation 61 of the Amended Habitats Regulations 2010, an assessment of the 'likely significant effects' on European Sites was undertaken. A screening matrix was compiled to review each development principle within the OLSPG and identify which, if any, would be likely to have a significant effect. The matrix is provided in **Table 3.1**.
- 2.7 Particular consideration was given to the possible pathways through which effects from activities associated with proposals within the OLSPG may be transmitted to features contributing to the integrity of a European Site (e.g. via groundwater, air, river catchments etc.). A risk-based approach involving application of the precautionary principle was adopted in the assessment of likely significant effects, such that an assessment of 'no significant effect' was only made where it was considered very unlikely, based on current knowledge and information available, that development principles could have a significant effect on the integrity of a European site(s).

### **STAGE 2: APPROPRIATE ASSESSMENT**

- 2.8 It is considered unlikely that Appropriate Assessment will be required following completion of the Screening process assuming implementation of safeguards as detailed later in this report. These would aim to ensure any likely significant effects are mitigated for during the Screening Process.

## 3 Screening Findings

### EUROPEAN SITES

- 3.1 No European Sites are located within the Legacy site. Two European Sites were identified (**Figure 1.1**) within 15km of the Legacy site: the **Lee Valley SPA/Ramsar** immediately adjacent to the north of the Legacy site and the **Epping Forest SAC** some 1.2km to the north east of the Legacy site at the closest point. The below discussion outlines the European Sites and their sensitivities, with further detail provided in **Appendix 1**.

#### Lee Valley SPA/Ramsar

- 3.2 The Lee Valley SPA and Ramsar site comprises a series of wetlands including man-made, semi-natural and floodplain habitats. These support wintering wildfowl in numbers of European importance and outstanding assemblages of breeding birds. Areas of reedbed also support significant numbers of bittern. Other habitats include small areas of fen, scrub and woodland, and larger areas of grassland such as associated with reservoir embankments. These habitats support an important invertebrate assemblage, including notable dragonflies, damselflies, grasshoppers and bush crickets. Mammal, amphibian and reptile populations are associated with the sites, including water vole and grass snake.
- 3.3 Key sensitivities of the site include:
- Disturbance of bird species, particularly as a result of recreation although this is currently well controlled through zoning.
  - Water quantity and impacts on habitat structure and diversity, as well as availability of key habitats such as shallow water and reedbeds for foraging birds.
  - Water quality including impacts on prey availability.
- 3.4 In terms of recreation pressures, the parts of the site adjacent to the Legacy site are not publicly accessible. Access for fishing and bird watching is controlled by Thames Water through a permit system, with specific reservoirs only accessible at certain times of year. The remaining area of the site with greater public access is located some 13km to the north of the Legacy site beyond the M25, with pedestrian and cycling connectivity along the Lee Valley Path.

#### Epping Forest SAC

- 3.5 Epping Forest SAC is designated for its ancient semi-natural woodland, heathland and stag beetle populations. Features associated with the ancient pollards are of particular importance for invertebrates including dead and rotting wood, sap runs, water holes and bracket fungi. The invertebrate community of the forest is of outstanding national importance both in terms of the diversity and numbers of notable species. The site also supports a diverse range of other habitats, and is of considerable importance for other fauna, including amphibians, reptiles, and birds.

- 3.6 Key sensitivities of the site include:
- Appropriate habitat management and maintenance of natural processes (in particularly relating to deadwood), habitat diversity and structure, and control of invasive species.
  - Recreational pressure although this is currently addressed through a Management Plan.
  - Air pollution, in particular NO<sub>x</sub> and N deposition. Current poor health amongst mature trees and failure of regeneration has been linked to air pollution, including areas in unfavourable condition.
  - Water availability in drought years.
  - High sensitivity of habitats to fertilisers and pesticides.

## POTENTIAL IMPACTS OF THE OLSPG

- 3.7 Each development proposal of the OLSPG is screened individually, which is consistent with current guidance documents. A screening matrix is provided in **Table 3.1**. In reality, however, the development principles will combine to deliver a particular scale, location and type of development across the Legacy site, and therefore the effects of the proposals in combination need to be considered.
- 3.8 A development plan is generally considered as likely to have a significant effect on a European site if it specifies:
- A certain quantum of development which results in possible impacts.
  - A certain location for development which results in possible impacts.
- 3.9 The OLSPG promotes around 29,000 new homes which will increase the area's population by around 60,000 people. The OLSPG also identifies locations for development such as employment and industrial land, social infrastructure such as education provision, transport enhancements and leisure, recreation and cultural facilities. Certain types of development are directed to certain areas within the Park (OLSPG sub-areas). Therefore, in principle, there is potential for significant impacts to arise.
- 3.10 In particular, three key potential effects were identified as a result of the OLSPG as detailed below.

### Air Pollution

- 3.11 Increased employment and residential development promoted within the OLSPG will have the potential to result in increased vehicle traffic. Increased traffic would result in increased air pollution, particularly NO<sub>x</sub> and nitrogen deposition levels with potential to impact on European Sites through both diffuse air pollution as well as local air pollution. Local air pollution may arise from increased traffic on roads outside of the Legacy site but within 200m of European Sites (the Department of Transport's Transport Analysis Guidance

states “beyond 200m, the contribution of vehicle emissions from the roadside to local pollution levels is not significant”<sup>5</sup>).

- 3.12 The Transport for London OLSPG Draft Strategic Transport Study (Version 4.0 July 2011) concludes that a series of interventions will be required to address the likely increase in traffic volumes associated with the OLSPG. A number of such measures have been incorporated within the OLSPG to encourage sustainable transport patterns and methods, in particular:
- **Development Principle C1** – Improving strategic connectivity and capacity (encouraging reduced car use). This also references London Plan Policy 7.14 Improving Air Quality, although there is no specific discussion relating to air quality impacts on nature conservation and European Sites.
  - **Development Principle C2** – Improving local connectivity and permeability (encouraging reduced car use).
  - **Development Principle C3** – Land use, freight and servicing (encouraging reduced car/motor vehicle use including through location of significant trip-generating development).
- 3.13 In addition, development principles related to land use in part aim to create high quality social infrastructure and employment opportunities within the local area, reducing the need for travel.
- 3.14 However, despite these measures and in the absence of air quality modelling, **uncertainty remains as to whether increases in traffic and adverse effects on air quality may impact the European Sites**. This is particularly the case for the Epping Forest SAC, the condition of which is already threatened by poor air quality. Therefore increased local air pollution (associated with roads leading to and from the Legacy site within 200m of the SAC) and diffuse air pollution may further add to pressure on the SAC, particularly given the predominate south westerly wind direction which would carry air pollution from the Legacy site to Epping forest.
- 3.15 The Lee Valley SPA and Ramsar site is less likely to be affected given reduced sensitivity to air pollution; although declining air quality may affect water quality, the condition of the SPA/Ramsar site is currently determined more by water quality issues such as agricultural runoff and sewage treatment. In addition, the area of the Lee Valley SPA and Ramsar site in the vicinity of the Legacy site are recognised largely for their value to wintering birds within the Walthamstow Reservoirs which are less likely to be impacted by air quality than other, more sensitive features found further to the north (for example, habitat mosaics of importance in providing prey for breeding birds and bittern).

### Recreation Pressure

- 3.16 The OLSPG facilitates an increase in the resident population of the area, with capacity identified for 29,000 new homes. In addition it aims to retain the Queen Elizabeth Legacy Park and the area as a whole as a major visitor

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<sup>5</sup> Department for Transport (updated April 2011) Transport Analysis Guidance <http://www.dft.gov.uk/webtag/documents/expert/unit3.3.3.php>

attraction following the 2012 Games, including as a destination for tourism, recreational, leisure and cultural attractions, and retail. In addition, a theme running through a number of the principles is to enhance connectivity for walking and cycling along the River Lee, whilst outline proposals for the reinstatement of the Chingford-Stratford rail line via the Hall Farm Curve (**CI and Northern Olympic Fringe sub-area**) would provide enhanced rail connectivity between the Legacy area and both the northern part of the Lee Valley and Epping Forest.

- 3.17 As a result of the above, there is potential for increased visitor pressure on both of the European Sites in the vicinity. At Epping Forest increased visitor numbers may result in increased erosion and compaction of soils at key access points, as well as greater litter, dog fouling and other issues associated with antisocial behaviour such as vandalism and arson.
- 3.18 Impacts on the Lee Valley SPA and Ramsar may include disturbance to fauna, particularly wintering and breeding birds, through increased human presence. The nature of the wetland habitats themselves largely restricts access to designated footpaths, with public access currently well managed through zoning and other access controls. The connectivity enhancements within the OLSPG may increase access to the European Site, particularly through pedestrian and cycle improvements along the canal network.
- 3.19 The part of the European Site, the Walthamstow reservoirs, closest to the Legacy area currently has restricted public access for angling and bird watching. Proposals for The Walthamstow Wetlands project (**Northern Olympic Fringe sub-area**) have potential to significantly increase disturbance within this area of the SPA and Ramsar site if not managed appropriately. This has been addressed within the Consultation Draft through the inclusion of wording within the sub-area supporting text requiring consideration of impacts on European Sites in the development of any such proposals. It is some 13km to the remaining area of the Lee Valley European site and as a result it is considered that fewer people will walk or cycle to these areas from the Legacy area, although improved rail links may also be available.
- 3.20 The OLSPG does include principles which would be expected to at least in part mitigate for the increase in visitor numbers. The overarching **Development Principle E Sustainable Development** includes supporting text stating the importance of reducing pressure on European sites, and also cross references London Plan Chapter 7 London's Living Places and Spaces which includes Policy 7.19 and the requirement to protect the integrity of European Sites. The OLSPG also includes support for the protection and enhancement of the biodiversity of the area within **Development Principle D Urban Form**. This principle also supports the creation and maintenance of high quality open space within the Legacy area, including the Queen Elizabeth Olympic Park (QEOP) itself and green infrastructure which may reduce pressure on other nearby open space.
- 3.21 These safeguards combined do provide a strong basis for the protection of European Sites from recreation pressure, although there would be scope to further strengthen this by inclusion of a specific principle for the protection

and enhancement of biodiversity, including reference to the importance of the provision of open space for biodiversity and access to nature.

### Transport Infrastructure

3.22 The OLSPG includes support for the enhancement of transport infrastructure with potential for impacts on European Sites, particularly the Lee Valley SPA and Ramsar Site:

- Improvements to the strategic rail network, namely upgrading of the West Anglia Main Line and reinstating the Hall Farm Curve immediately south of the Walthamstow reservoirs (**Development principle C1**). The latter would also allow reinstatement of the Chingford-Stratford Line, improving access from the area to the Lee Valley and Epping Forest (see **Recreation Pressure**).
- Support for greater use of the canal network as a sustainable mode of transport (**Development principle C3**). Although this may be more likely to result in increased canal transport from the River Thames to the Legacy area, increased canal traffic from the north may result in increased disturbance in the vicinity of the Lee Valley SPA and Ramsar site (including potential upgrading of canals and facilities).

3.23 No specific transport proposals are put forward as part of the OLSPG, which promotes further investigation of options. However, should such proposals be taken forward they may result in impacts on the Lee Valley SPA in particular given the proximity to the rail and canal networks which may be subject to works or increased use (and therefore disturbance and even loss of habitat dependent on the exact location of works).

**Table 3.1: HRA Screening Matrix**

OLSPG Consultation Draft	Could the option have likely significant adverse effects on European site(s)?
<b>Vision</b>	
'Twenty years after the Games, it's one of the best places in London to live and work: the best legacy there could be from 2012'	No – establishes principles of sustainable development and does not itself present a quantum of development. Vision to increase attractiveness of East London for residents, employment and visitors/tourists and possible impacts associated with increased air pollution or increased visitor numbers to European Sites addressed by sustainability goals, improved connectivity (with reduced car reliance) and creation of high quality open space within the QEOP and wider areas including green links.
<b>Delivery Principle A Homes and Communities</b>	
Development Principle A1 – Building a network of well connected Lifetime Neighbourhoods	<b>Uncertain</b> – identifies the potential for around 29,000 new homes within the sub-areas. This will significantly increase the local population, with potential impacts including increased air pollution as a result of traffic, and recreation impacts on the European Sites given improved connectivity to the Legacy area (particularly the Lee Valley with improved access along the canal network).

OLSPG Consultation Draft	Could the option have likely significant adverse effects on European site(s)?
	Recreation pressure has been addressed in particular through the inclusion of text under Development Principle E requiring consideration of this impact. In addition the OLSPG is based strongly on sustainability principles including support for transport measures to minimise car use, and maintenance of high quality open space within the Legacy Park. However, uncertainty remains whether the measures included within the OLSPG would be sufficient to address (avoid or mitigate) air pollution impacts in particular, and protection from recreation pressure should be further strengthened.
Development Principle A2 – Promoting family housing and increasing housing choice	No – this relates to the type of housing provision rather than quantum and would therefore not have an impact on European Sites.
Development Principle A3- Creating, protecting and enhancing social infrastructure	No – support for provision of local, high quality infrastructure would be likely to reduce transport use and may therefore have beneficial environmental impact.
Development Principle A4 – Creating a lasting sporting legacy	<b>Uncertain</b> – this would result in increased visitors and tourism to this part of East London. Although the majority of visitors would be likely to be attracted specifically to the QEOP and associated facilities/attractions within the Legacy area, improved connectivity between the European Sites and the Legacy area may also increase visitor pressure on the Lee Valley and Epping Forest. This is largely addressed through supporting text under Development Principle E requiring consideration of recreational pressure on European sites. However, given the scale of change and likely visitor numbers, protection should be further strengthened through inclusion of a Development Principle requiring protection and enhancement of biodiversity.
<b>Delivery Principle B Business and employment</b>	
Development Principle B1 – Promoting a hierarchy of well connected town centres	No – aims to promote Stratford as a Metropolitan Centre and the maintenance of a hierarchy of town centres. It does not itself result in development but relates to how centres are promoted and planned. The focus on these areas of centres and support for linkages may reduce transport and result in an environmental benefit.
Development Principle B2 – Planning for new and emerging sectors	No – this creates clusters for creative and cultural industry within key locations within the area. This relates to the location of development rather than a quantum, and continues to focus development in the urban area. It also includes a Green Enterprise Zone to help the capitals

OLSPG Consultation Draft	Could the option have likely significant adverse effects on European site(s)?
	transition to a Low Carbon Capital with wider benefits for nature conservation and European Sites. Again this is against the backdrop of general sustainability principles within the SPG.
Development Principle B3 - Promoting mixed use neighbourhoods	No – as above this principle steers development locations within the Legacy site and will not lead to development per se. Again this is against the backdrop of general sustainability principles within the SPG. The creation of mixed use neighbourhoods may have environmental benefits in reducing requirements for transport.
Development Principle B4 – Land use change	No – this relates to the managed release of existing industrial land. It will not itself result in development, or any particular type of development. The principle includes protection of social infrastructure and environmental amenity in the area which would be likely to have beneficial environmental impacts.
Development Principle B5 – Promoting tourism and developing the visitor economy	<b>Uncertain</b> – this encourages expansion of visitor accommodation and attractions, and will result in increased visitor numbers with potential for recreation impacts on European Sites given improved connectivity between the Legacy area and the Lee Valley and Epping forest. This has in part been addressed through supporting text under Development Principle E requiring consideration of recreational pressure on European sites. However, given the scale of change and likely visitor numbers, protection should be further strengthened through inclusion of a Development Principle requiring protection and enhancement of biodiversity.
<b>Delivery Principle C Connectivity and transport</b>	
Development Principle CI – Improving strategic connectivity and capacity	<p><b>Uncertain</b> – outline options for transport infrastructure enhancement include:</p> <ul style="list-style-type: none"> <li>- Reinstatement of the Hall Farm Curve and the Chingford-Stratford line. Work may involve disturbance to the Lee Valley SPA and Ramsar (Walthamstow reservoirs) as well as increased access to the northern Lee Valley and Epping Forst via the new rail link.</li> <li>- Upgrading the West Anglia Main Line may involve works in the vicinity of the Lee Valley SPA and Ramsar.</li> </ul> <p>The OLSPG only suggests these measures as options and further investigation would be required should either option be taken forward including HRA. However, no safeguards are provided within the principle to address the potential for affects.</p>

OLSPG Consultation Draft	Could the option have likely significant adverse effects on European site(s)?
	The principle does include support for measures to tackle potential increases in traffic and air pollution.
Development Principle C2 – Improving local connectivity and permeability	<b>Uncertain</b> – on the whole this principle would be expected to result in beneficial environmental effects by improving opportunities for sustainable transport, including area wide walking, cycling and public transport interventions. However, support for improved connectivity along the Lee Valley may also increase pedestrian and cycle access north to the Lee Valley SPA and Ramsar site with potential for increased recreation pressure on these sites. This has in part been addressed through supporting text under Development Principle E requiring consideration of recreational pressure on European sites. However, given the scale of change and likely visitor numbers, protection should be further strengthened through inclusion of a Development Principle requiring the protection and enhancement of biodiversity.
Development principle C3 – Land use, freight and servicing	<b>Uncertainty</b> – this aims to improve the efficiency of freight delivery and to encourage environmentally sustainable modes of freight delivery, with development proposals encouraged to investigate use of existing waterway and rail networks. The consideration of use of waterways is encouraged which may have potential implications for the upstream Lee Valley European Site. Although further work would be required to determine viability of canal transport, and specific proposals would need to be subject to HRA if appropriate, no safeguards are provided within the principle to address the potential for affects.
<b>Delivery Principle D Urban form</b>	
	<b>Uncertain</b> – on the whole this guides the form of development rather than the quantum or location. The principle includes the requirement that proposals should both protect and enhance the areas biodiversity, supports creation of an integrated urban area which would reduce transport requirements, while support is given for Mayor’s Green Grid objectives and proposals to create a network of parks and open spaces along the River Lee. In addition, supporting text under Development Principle E requires consideration of recreational pressure on European sites. However, the principle does further support the enhancement of connectivity along the areas canal network with potential for increased recreational

OLSPG Consultation Draft	Could the option have likely significant adverse effects on European site(s)?
	pressure on the Lee Valley SPA and Ramsar site. However, given the scale of change and likely visitor numbers, protection should be further strengthened through inclusion of a Development Principle requiring the protection and enhancement of biodiversity.
<b>Delivery Principle E Sustainable Development</b>	
Development Principle E1 - Energy	No – this encourages new developments to connect with two proposed energy centres within the area produced as part of the Stratford City and 2012 Games developments. The principle does not itself propose development, and aims to enhance sustainability and low carbon energy production with wider benefits for nature conservation and European Sites.
Development Principle E2 - Flood risk and water conservation and management	No – this requires that development proposals in the Legacy reduce the potential for flood risk by design or location, and risk assessment. It also encourages improvement of water quality in waterways including support for sustainable drainage systems and urban greening, and encouragement for flood storage features to incorporate biodiversity, and amenity, benefit. As such it does not propose or require any specific proposals which would adversely impact on European Sites, and would be expected to enhance water quality with particular benefits for the Lee Valley European Site.
Development Principle E3 - Waste management and contamination	No – the principle encourages an efficient approach to waste management. It does not propose specific projects (although opportunities for additional waste capacity will be explored) which may impact on European Sites, although it does encourage the exploration of the potential establishment and use of wharves. Such proposals once further developed would need to be assessed in more detail in terms of their environmental impact. Support for opportunities to provide clean energy from waste would have wider benefits for nature conservation and European Sites.
<b>The Sub-Areas</b>	
The Olympic Park	<b>Uncertain</b> – in particular given the potential for air pollution and recreation impacts as detailed previously. Key features within The Olympic Park sub-area include: <ul style="list-style-type: none"> <li>- 3,100 new homes, and 42,000m<sup>2</sup> new and improved business floor space.</li> <li>- Improved north-south connectivity through the Park along the River Lee.</li> <li>- Queen Elizabeth Olympic Park in accordance with the 2007 planning approval available for</li> </ul>

OLSPG Consultation Draft	Could the option have likely significant adverse effects on European site(s)?
	<p>'public open space for amenity and recreational purposes'.</p> <ul style="list-style-type: none"> <li>- Sustainable goals including: use of renewable energy sources; sustainable urban drainage infrastructure to combat the urban heat island effect; retention of trees and vegetation, and new planting in accordance with London Plan policies.</li> </ul>
Stratford	<p><b>Uncertain</b> – in particular given the potential for air pollution and recreation impacts as detailed previously, as well as impacts associated with transport infrastructure enhancements. Key features within the Stratford sub-area include:</p> <ul style="list-style-type: none"> <li>- 7,400 new homes, and 915,000m<sup>2</sup> new and improved business floor space.</li> <li>- Improved connectivity and support for walking and cycling.</li> <li>- Strategic transport improvements West Anglia Main Line and reinstatement of the Hall Farm Curve Link and Chingford-Stratford line.</li> <li>- Sustainable goals including: use of decentralised energy.</li> </ul>
Southern Olympic Fringe	<p><b>Uncertain</b> – in particular given the potential for air pollution and recreation impacts as detailed previously. Key features within the Southern Olympic Fringe sub-area include:</p> <ul style="list-style-type: none"> <li>- 9,600 new homes, and 206,000m<sup>2</sup> new and improved business floor space.</li> <li>- Improved north-south connections along the River Lee.</li> <li>- Sustainable goals including: high quality open space including greenway and waterways; public transport and connectivity enhancements; high standard of design and environmental credentials for new development; addressing flood hazard.</li> </ul>
Hackney Wick / Fish Island	<p><b>Uncertain</b> – in particular given the potential for air pollution and recreation impacts as detailed previously. Key features within the Hackney Wick / Fish Island sub-area include:</p> <ul style="list-style-type: none"> <li>- 5,900 new homes, and 173,000m<sup>2</sup> new and improved business floor space.</li> <li>- Social infrastructure to include new open spaces including connectivity with nearby open space including in accordance with the Tower Hamlets and East London Green Grids.</li> <li>- Improved north-south connections along the River Lee.</li> <li>- Sustainable goals including: waste and energy facilities; addressing flood hazard.</li> </ul>

OLSPG Consultation Draft	Could the option have likely significant adverse effects on European site(s)?
Northern Olympic Fringe	<p><b>Uncertain</b> – in particular given the potential for air pollution and recreation impacts as detailed previously, as well as impacts associated with transport infrastructure enhancements. Key features within the Hackney Wick / Fish Island sub-area include:</p> <ul style="list-style-type: none"> <li>- 3,200 new homes, and 20,000m<sup>2</sup> new and improved business floor space.</li> <li>- Promotion of access to the Lee Valley Regional Park.</li> <li>- Reinstatement of the Hall Farm curve and Chingford-Stratford line, improving access to Epping Forest and Lee Valley Regional Park.</li> <li>- North-South connections along the River Lee and Dagenham Brook.</li> <li>- Walthamstow Wetlands nature reserve and links to the QEOP (with wording requiring the avoidance of impacts on European Sites).</li> <li>- Sustainable goals including: waste and energy facilities; addressing flood hazard.</li> </ul>
<b>3 Delivery</b>	
The final part of the document sets out a strategic approach to delivering the Legacy	No – This section details with how the legacy will be delivered for example in terms of collaboration and governance, delivery mechanisms, funding and monitoring. The importance of the provision of strategic infrastructure is discussed, and this includes the need for green infrastructure such as parks and open spaces which will be important in ensuring potential impacts on other nearby open space, including European Sites, is addressed.

## IN-COMBINATION IMPACTS

- 3.24 A table summarising other relevant development plans and proposals which may have an in-combination impact is provided in **Appendix 2**. No significant impacts have been identified by HRA of any of these plans and projects which have been subject to HRA. However, uncertainty remains regarding the OLSPG and whether this may result in significant effects on European Sites and therefore there is potential for in-combination effects.

## 4 Recommendations and Conclusion

### RECOMMENDATIONS

- 4.1 In summary, there is uncertainty regarding whether the Consultation Draft of the OLSPG would result in significant effects on European Sites, namely the Lee Valley SPA and Ramsar site and Epping Forest SAC. In particular uncertainty remains regarding the following issues:
- Air pollution (Development principle A1, Sub-Areas) given significant increases in residential populations and employment facilities, and due to uncertainty regarding the success of measures to reduce use of motor vehicles. Air pollution would have greatest potential to affect Epping Forest given the increased sensitivity of woodland and heathland habitats.
  - Recreation pressure (Development principles A1, A4, B5, C1, C2, D, Sub-Areas) given measures to increase the local population and visitor numbers, coupled with measures to improve connectivity particularly along the River Lee and associated waterways.
  - Transport infrastructure enhancements (C1, C4, Sub-Areas) including support for increased use of the canal network, enhancement to the West Anglia Main Line and reinstatement of the Hall Farm Curve Link and Chingford-Stratford line. These have potential for impacts on the Lee Valley SPA and Ramsar site as a result of works and disturbance, as well as recreation pressure due to improved access to the Lee Valley and Epping Forest (see above).
- 4.2 There are measures currently built in to the OLSPG which may go some way to address these issues, including strong support for sustainable transport and creation of high quality open space which would be expected to reduce recreation pressure on the European Sites. The potential for increased recreation pressure on European Sites has been addressed through inclusion of wording within supporting text under Development Principle E. The inclusion of these measures in the Consultation Draft is welcomed. However, it is recommended that additional Development Principles and amended wording are required to further strengthen protection against these impacts and provide greater certainty that the OLSPG will not result in impacts on the European Sites. This is considered necessary given the large scale change of land use, and proposed growth in the local residential population, working population, and visitor and tourist numbers. This would also be in accordance with the draft National Planning Policy Framework (see paragraph 1.4).
- 4.3 The following safeguards are therefore recommended for inclusion in the OLSPG.

### **E Sustainable Development: Additional Development Principle**

- Inclusion of a **Development Principle requiring protection, enhancement and management for biodiversity** within the

OLSPG. This should specifically require that development proposals consider, and if necessary, address potential impacts on European Sites referencing the potential requirement for HRA of specific proposals. This should reflect the supporting text to Development Principle E and the requirement for the provision of open space for biodiversity and access to nature, including reducing recreation pressure on European Sites. This may be similar to Development Principles D2 and D6 which were included in the 5<sup>th</sup> Draft OLSPG.

- It may be considered appropriate that two separate Development Principles are required, one relating to the protection and enhancement of biodiversity as a result of development, and the second the creation of high quality open space for biodiversity and access to natural greenspace.
- In addition, this could cross reference the Northern Olympic Fringe sub-area and proposals for the creation of the Walthamstow Wetlands nature reserve, and that this must consider potential impacts on European Sites.

### Amendments to Existing Development Principles

- **Development Principle C1 Improving strategic connectivity and capacity:** reference to Policy 7.14 of the London Plan is welcomed. This should be strengthened by inclusion of supporting text referencing that measures to reduce air pollution are required to address potential impacts on European Sites, particularly Epping Forest SAC, and that in accordance with the London Plan developments should be at least 'air quality neutral'. Along with measures to encourage sustainable transport and reduce motor vehicle use, this would provide further certainty that air pollution impacts would be addressed.
- **Development Principle C1 Improving strategic connectivity and capacity:** insert wording stating that the potential for impacts on European Sites must be considered when investigating transport enhancement options, particularly railway enhancements in the vicinity of European Sites. Detailed proposals may require HRA.
- **Development Principle C3 Land use, freight and servicing:** insert wording stating that the potential for impacts on European Sites must be considered when investigating transport enhancement options. This would require assessment of enhancement works and the potential increased use of canals in the vicinity of the Lee Valley SPA and Ramsar site. Detailed proposals may require HRA.
- **Delivery Principle D Urban form:** Consider inclusion of text supporting provision of green infrastructure within the built environment (such as street trees, living roofs and walls, planters and pocket parks) which may go some way to reduce recreation pressure elsewhere, whilst assisting adaptation to climate change and reduce air pollution.

### Amendments to Sub-Areas Text

- **Olympic Park Sub-Area – Urban form section:** potential affects as a result of proposals for this sub-area would be addressed through the inclusion of the new Development Principle(s) and implementation of recommended changes to Development Principles C1 and D.
- **Stratford Sub-Area – Urban form section:** potential affects as a result of proposals for this sub-area would be addressed through the inclusion of the new Development Principle(s) and implementation of recommended changes to Development Principles C1, C3 and D.
- **Hackney Wick / Fish Island Sub-Area – Urban form section, Open Space sub-heading:** potential affects as a result of proposals for this sub-area would be addressed through the inclusion of the new Development Principle(s) and implementation of recommended changes to Development Principles C1 and D.
- **Northern Olympic Fringe Sub-Area – Urban Form section, Open space and biodiversity sub-headings:** potential affects as a result of proposals for this sub-area would be addressed through the inclusion of the new Development Principle(s) and implementation of recommended changes to Development Principles C1, C3 and D.

### Amendments to Delivery Text

- **4.6 Delivery Study:** add to the second set of bullet points a statement requiring 'An assessment of specific proposals, particularly for transport infrastructure, for potential impacts on European sites, and the potential requirement for HRA'.

## CONCLUSION AND NEXT STEPS

- 4.4 Safeguards included within the OLSPG Consultation Draft to address potential impacts on European Sites are welcomed. However, these require further strengthening given that some uncertainty remains regarding the potential for significant effects on European Sites. Therefore in its current form, and in accordance with the precautionary principle, full Appropriate Assessment of the plan would be required. Assuming the above additional safeguards are included, it would be possible to state with greater certainty that the OLSPG would not result in significant effects on the European Sites.
- 4.5 Natural England will be consulted on the findings of the Consultation Draft HRA and this Interim Screening Report, and their comments incorporated in to the Final Screening Report.

## 5 References

**David Tyldesley and Associates for English Nature (2007).** The Assessment of Regional Spatial Strategies and Sub-Regional Strategies under the Provisions of the Habitats Regulations: Draft Guidance (Issue 3)

**Department for Communities and Local Government (July 2011)** Draft National Planning Policy Framework

<http://www.communities.gov.uk/documents/planningandbuilding/pdf/1951811.pdf>

**Department for Communities and Local Government (2006)** Planning for the Protection of European Sites. Guidance for Regional Spatial Strategies and Local Development Documents

**European Commission Environment DG (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

**Mayor of London (2011)** Olympic Legacy Supplementary Planning Guidance: Draft 5. Greater London Authority. January 2011

**Mayor of London (2011)** Olympic Legacy Supplementary Planning Guidance: Mayoral Draft. Greater London Authority. July 2011

**Mayor of London (2011)** Olympic Legacy Supplementary Planning Guidance: Consultation Draft. Greater London Authority. August 2011

**OPDM (2005)** Planning Policy Statement 9: Biodiversity and Geological Conservation.

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## **Appendix I**

### **Attributes of the European Sites**



**Table A1: Lee Valley SPA and Ramsar site**

Site description	
<p>The Lee Valley SPA and Ramsar site comprises a series of wetlands including man-made, semi-natural and floodplain habitats such as open water, reedbeds and marginal communities associated with embanked reservoirs, flooded gravel extraction pits and sewage treatment lagoons. These support wintering wildfowl in numbers of European importance and outstanding assemblages of breeding birds. Areas of reedbed also support significant numbers of bittern. Other habitats include small areas of fen, scrub and woodland, and larger areas of grassland such as associated with reservoir embankments.</p> <p>These habitats support an important invertebrate assemblage, including notable dragonflies, damselflies, grasshoppers and bush crickets. Mammal, amphibian and reptile populations are associated with the sites, including water vole and grass snake.</p>	
Component SSSI(s)	<ul style="list-style-type: none"> <li>• Amwell Quarry</li> <li>• Rye Meads</li> <li>• Turnford and Cheshunt Pits</li> <li>• Walthamstow Reservoirs</li> </ul>
SPA designated interest feature(s)	<ul style="list-style-type: none"> <li>• Overwintering bittern (population of Annex I species of European importance)</li> <li>• Overwintering gadwall and shoveler (population of migratory species of European importance)</li> </ul>
SPA conservation objectives	<ul style="list-style-type: none"> <li>• To maintain in favourable condition the habitats for the populations of bittern, gadwall and shoveler with particular reference to open water and surrounding marginal habitats.</li> </ul>
Summary of standards defining favourable condition of SAC interest feature	
Bittern	<ul style="list-style-type: none"> <li>• Disturbance with no significant reduction or displacement of wintering birds between Oct-March.</li> <li>• Extent and distribution of habitat with no significant deviation from reference level.</li> <li>• Maintain area of reedbeds and ditches as suitable for overwintering bittern.</li> <li>• Maintain habitat structure/features including reedbeds, large areas of open water, and appropriate water level to provide shallow water in reeds, with frequent deep pools and dykes.</li> <li>• Food availability with sufficient fish and amphibians.</li> </ul>
Gadwall and shoveler	<ul style="list-style-type: none"> <li>• Disturbance with no significant reduction or displacement of wintering birds between Oct-March.</li> <li>• Extent and distribution of habitat with no significant deviation from reference level.</li> <li>• Maintenance of water level to provide extensive shallow water (feeding).</li> <li>• Food availability including vegetation cover, aquatic plants and invertebrates.</li> </ul>
Ramsar-designated interest feature(s)	<ul style="list-style-type: none"> <li>• Overwintering gadwall and shoveler</li> <li>• Whorled water milfoil (nationally scarce plant)</li> <li>• <i>Micronecta minutissima</i> (rare/vulnerable waterboatman)</li> </ul>
Other possible management issues (various sources including Natura 2000 standard data form, SSSI Views About Management, SSSI Condition Assessments, Management Plans,	

etc.)

- Habitat management: control of natural colonisation/succession to maintain wetlands.
- Water quality: includes nutrient and sediment loads. Eutrophic water quality is to be addressed by AMP3 funding under the Urban Waste Water Treatment Directive.
- Water quantity: sympathetic management of water levels required including on site with problems from low/high/variable levels relating to vegetation management. Potential problems of over abstraction particularly during droughts.
- Recreational pressure: potential disturbance but currently well controlled by zoning of Lee Valley Regional Park and its waterbodies.
- Majority in Favourable/Unfavourable Recovering condition with localised compartments Unfavourable Declining due to fluctuating water levels.

**Table A2: Epping Forest SAC**

Site description	
<p>Epping Forest is dominated by ancient semi-natural woodland and forms one of the largest remaining examples of ancient woodland pasture, supporting three of the main wood-pasture types found in the country: pedunculate oak-beech, pedunculate oak-hornbeam and lowland birch-pedunculate oak. These include frequent over-mature pollards. Shrub components include abundant holly with species such as hazel and rowan less frequent. The cessation of pollarding and resultant dense woodland canopy creates a relatively sparse basal flora.</p> <p>Features associated with the ancient pollards are of particular importance for invertebrates including dead and rotting wood, sap runs, water holes and bracket fungi. The invertebrate community of the forest is of outstanding national importance both in terms of the diversity and numbers of notable species.</p> <p>The habitat diversity of the woodland is enhanced by open areas, including acid and neutral grassland, with heathland, and wetland habitats including bogs, pools and ponds. These support a number of notable plant species. The wetland habitats are also of considerable importance for invertebrates as well as for amphibians, whilst the forest also supports four reptile species (adder, slow worm, grass snake and lizard). Notably diverse bryophyte and bird communities are also supported, again due to the size and diversity of the semi-natural habitats.</p>	
Component SSSI(s)	<ul style="list-style-type: none"> <li>• Epping Forest</li> </ul>
SAC-designated interest feature(s)	<ul style="list-style-type: none"> <li>• Beech forests with holly and yew in the shrub layer</li> <li>• Dry heaths</li> <li>• Wet heaths</li> <li>• Stag beetle</li> </ul>
SAC conservation objectives	Maintain in favourable condition the beech forest, dry heaths, wet heaths and the habitats for the population of stag beetle.
Summary of standards defining favourable condition of SAC interest feature	
Beech woodland with and without heath (NVC type W12 and W14) including box dominated scrub.	<ul style="list-style-type: none"> <li>• No loss in extent of ancient woodland and the highest quality recent semi-natural woodland.</li> <li>• Maintenance of natural processes and structural development.</li> <li>• Species composition. Areas of minimum intervention; and areas of high forest with reference to the native/non-native ratio and damage from non-native fauna and external unnatural factors (including pollution).</li> <li>• Positive indicators – species, habitats and structures characteristic of the site, including basal flora composition, notable species including bryophytes and fungi, associated habitats and transitional habitats.</li> </ul>

	<ul style="list-style-type: none"> <li>• Regeneration potential. Includes areas of non-intervention, high forest and wood pasture with reinstatement of pollarding, and maximum acceptable levels of planting.</li> </ul>
Dry heaths	<ul style="list-style-type: none"> <li>• Maintain existing areas.</li> <li>• Maintenance of natural bare ground and but limiting ground disturbance from recreation.</li> <li>• Vegetation structure of <i>Calluna vulgaris</i> including different life stages, and frequency of characteristic dry heath species.</li> <li>• Negative indicators, for example excess degenerate/dead <i>Calluna vulgaris</i>, Rhododendron, tree/shrub/bramble colonisation, signs of overgrazing.</li> </ul>
Wet heaths	<ul style="list-style-type: none"> <li>• Maintain existing areas.</li> <li>• Maintenance of natural bare ground and but limiting ground disturbance from recreation.</li> <li>• Vegetation structure with cover of <i>Molinia caerulea</i>, ericoids and sphagnum; frequency of characteristic/rare wet heath species.</li> <li>• Negative indicators including cover of tree/scrub.</li> </ul>
Stag beetle	<ul style="list-style-type: none"> <li>• Confirmation of presence of breeding population.</li> <li>• Maintenance of existing number (at a minimum) of old trees.</li> <li>• Distribution of age structure from seedlings and saplings to ancient and dead trees.</li> <li>• Proportion of large trees with signs of internal decay/hollowing.</li> <li>• Abundant fallen deadwood of an appropriate size.</li> <li>• Position of old trees/stumps with proportion in suitable areas.</li> </ul>
<p><b>Other possible management issues (various sources including Natura 2000 standard data form, SSSI Views About Management, SSSI Condition Assessments, Management Plans, etc.)</b></p>	
<ul style="list-style-type: none"> <li>• Restoration of management components integral to enhancement of condition, e.g. pollarding, wood pasture management. Possible problems associated with vulnerability of old neglected pollards to re-pollarding.</li> <li>• Air pollution cited by Natural England as a possible significant problem effecting the integrity of the SAC, in particular NO<sub>x</sub> and N deposition. Relates to position of Forest downwind from London and motor vehicle pollution (including M25 to North).</li> <li>• Majority of the SSSI stated as in Favourable/Favourable Recovering condition although significant proportion of compartments in Unfavourable/Unfavourable Declining condition. Poor health amongst mature trees and failure of regeneration linked to air pollution.</li> <li>• Some improvements in air quality (reduced SO<sub>2</sub>) since the Clean Air Act 1956 as well as re-pollarding and wood pasture management cited as causes for improvements in bryophyte populations.</li> <li>• Recreational pressure as possible problem although addressed in part by Management Plan.</li> <li>• Non-native species control required e.g. Rhododendron, turkey oak, sycamore.</li> <li>• Drought years potentially contributing to declining tree health in some areas.</li> <li>• High sensitivity of habitats to inorganic fertilisers and pesticides.</li> </ul>	



## **Appendix 2**

### **Review of Other Plans for Potential In-Combination Effects**



## London Borough of Waltham Forest Core Strategy: Preferred Options (January 2011 and updated May 2011)

### General summary

The London Borough of Waltham Forest lies to the north of the main focus of the Olympics, and as such has developed a Northern Olympic Fringe Area Action Plan as part of the Local Development Framework (see below).

**Housing:** The Core Strategy targets the provision of housing on large brownfield sites in Walthamstow Central, Blackhorse Lane and the North Olympic Fringe growth areas. The minimum housing target for the Borough is 665 units per annum, of which 363 will be affordable. The Council aims to work with the 2012 Olympic Games host Boroughs and regional stakeholders to develop and deliver a Multi Area Agreement (MAA), focusing on providing more jobs, an improved public realm and housing renewal.

**Employment:** Whilst the number of jobs in Waltham Forest is predicted to grow by over 3,000 between 2006 and 2026, during the same time period, there could be a reduction in demand for industrial land in the Borough by an average of 17.8hectares. The Council will facilitate sustainable economic growth by:

- Intensifying and upgrading existing employment lands in the regeneration areas of Blackhorse Lane, the Northern Olympic Fringe Area, Wood Street and Walthamstow Town Centre.
- Promoting, managing and, where appropriate, protecting Strategic Industrial Locations (SILs) in accordance with the London Plan.
- Seeking opportunities for growth and development in the borough's regeneration areas, with Walthamstow Town Centre and Blackhorse Lane as preferred locations for office developments as part of mixed use schemes.
- Supporting new Business Improvement Districts (BIDs) in the regeneration areas of Blackhorse Lane, Northern Olympic Fringe Area, Wood Street and Walthamstow Town Centre.

An updated version of the Core Strategy was submitted for examination in May 2011.

### Summary HRA Findings<sup>6</sup>

#### Final Report for Consultation January 2011

HRA concluded that:

- no pathways of impact leading to adverse effects will occur on Wormley-Hoddesdonpark Woods SAC.
- Epping Forest SAC will not be affected by the Core Strategy policies through the pathway of urbanisation.
- Lee Valley SPA and Ramsar site will not be affected by the Core Strategy through the pathways of urbanisation, reduced air quality or reduced water resources (availability).

The HRA found that that the Core Strategy does contain measures that should reduce the possibility of unsustainable recreational pressure arising at Epping Forest SAC and Lee Valley SPA and Ramsar sites as a result of planned development within the borough. Similarly, the HRA concluded that the Core Strategy does contain measures that should reduce the possibility of Epping Forest SAC being subject to adverse effects of reduced air quality as a result of planned development within the borough.

However, to conclude that no likely significant effect, either alone or 'in combination' with other plans and projects, in relation to both recreation pressure and air quality, the HRA identified amendments to the Core Strategy relating to the delivery of greenspace, transport assessments and travel plans.

<sup>6</sup> London Borough of Waltham Forest Local Development Framework Core Strategy Proposed Submission Habitat Regulations Assessment (Final Report for Consultation January 2011; Final Report for Submission May 2011)

The HRA concluded that once the Core Strategy includes the additional measures set out, it will be possible to conclude that it will not have any likely significant effects on any European Sites.

The final

Final Report for Submission May 2011

The updated HRA concluded that on inclusion of further policy mechanisms as above, no significant effects were considered likely.

### **London Borough of Waltham Forest Local Development Framework: Northern Olympic Fringe Area Action Plan: Preferred Options (January 2011)**

#### **General summary**

The stated aims of the Northern Olympic Fringe Area Action Plan (AAP) are to:

- Co-ordinate development and manage development pressure in a holistic manner within the Northern Olympic Fringe.
- Identify potential for growth including residential in mixed-use development.
- Support and develop the creative, commercial and industrial sectors in this area.
- Ensure an appropriate mix of activities by serving as the basis for land use allocation.
- Assess developer proposals and be used as a material consideration in the determination of planning applications.
- Identify future service and community infrastructure needs in relation to growth.

The Northern Olympic Fringe Area Action Plan will form a planning document within Waltham Forest's Local Development Framework.

#### **Summary HRA Findings<sup>7</sup>**

Recreational pressure, urbanisation, reduction in air quality and water resource issues have all been considered in relation to the impacts of the Northern Olympic Fringe Area Action Plan on the Lee Valley SPA/Ramsar site and Epping Forest SAC.

It has been concluded that, in consideration of the AAP as a daughter document of the Core Strategy, then it does not contain, either through its own policies, or through relation to the CS, any measures that would be likely to have a significant adverse effect on the European Sites assessed. As a result, it is concluded the draft policies of the AAP do not need to be taken forward for Appropriate Assessment.

### **London Borough of Hackney: Core Strategy DPD (Adopted November 2010)**

#### **General summary**

Hackney borders the City of London to the south, the Olympic Park and Stratford City in the east and close to Canary Wharf to the south-east. Administratively, the London Boroughs of Islington, Haringey, Waltham Forest, and Tower Hamlets border Hackney. The 2012 Olympic and Paralympics Games is expected to be a catalyst, for improving the borough.

The Games offer unrivalled opportunities for sport, culture and tourism, and will help move London's centre of gravity eastwards. This will be bolstered by the extension of the East London Line to Dalston, Haggerston and Hoxton that opened in 2010 and the improvements to the North London Line.

The Core Strategy identifies the following locations for economic and / or housing growth:

#### *Town centres*

- Dalston (Major Town Centre) with a retail and commercial emphasis; and
- Hackney Central (District Town Centre) as the civic and cultural centre.

<sup>7</sup> London Borough of Waltham Forest Local Development Framework Northern Olympic Fringe Area Action Plan Preferred Options – Habitats Regulations Assessment (January 2011)

*Improved railway corridors*

- The new East London Line from Shoreditch High Street to Dalston where investment in 4 new railway stations is taking place; and
- The North London Line from Hackney Wick to Dalston with improved services, greater capacity and improved stations.

*South Shoreditch*

- Includes Hackney's part of London's Central Activities Zone and extends to include the southerly parts of Hoxton and Kingsland Road.

*New Communities*

- Woodberry Down as a new community within a regenerated housing estate and Manor House with improved facilities for the new population; and
- Hackney Wick as a neighbourhood of employment led mixed development that maximises Olympic Legacy opportunities.

**Housing:** Housing growth in Hackney is set to continue to meet the London Plan 2009 consultation draft housing targets of 11,600 additional dwellings by 2021 (1,160 net additional new dwellings each year from 2011 to 2021). The council's estate renewal programme, including those estates outside the growth areas identified, in total contributes a significant number of net additional new homes.

**Summary HRA Findings<sup>8</sup>**

With regard to Epping Forest SAC, the HRA concluded: Issues of recreational pressure and air quality have all been considered in relation to impacts of the Core Strategy on Epping Forest SAC and following consultation with Natural England it has been possible to conclude that an adequate policy mechanism is in place to ensure that development to be delivered under the Core Strategy will not lead to adverse effects on Epping Forest (when considered in conjunction with the increased populations of surrounding authorities).

With regard to the Lee Valley SPA, the HRA concluded: Issues of recreational pressure, air quality and water resources have all been considered in relation to impacts of the Core Strategy on the Lee Valley SPA. Following Appropriate Assessment, and within the context of the policies already contained within the Core Strategy (some of which were amended following a previous round of HRA recommendations), it is possible to conclude that adverse effects on the Lee Valley SPA/Ramsar as a result of development within London Borough of Hackney under the Core Strategy is unlikely.

Potential impacts on three further sites (Wormley Hoddesdonpark Woods SAC, Richmond Park SAC and Wimbledon Common SAC) were covered by the screening appraisal, following which it was considered that impacts on these sites could be screened out since there was no mechanism for the Core Strategy to lead to an adverse effect.

**London Borough of Newham: Core Strategy Proposed Submission Draft DPD (February 2011)**

**General summary**

The London Borough of Newham Core Strategy Proposed Submission Draft DPD contains an ambitious regeneration programme, covering areas of major growth, including the Olympic Legacy, Stratford, Canning Town and the Royal Docks, involving major new housing development, new job creation and new community infrastructure.

60% of the Olympic site falls within Newham, including the Olympic Village, the Stadium, the Aquatics Centre and the Velodrome. The resultant development of the Olympic Park, Stratford Metropolitan Centre and the Royal Docks covers approximately 124 hectares of development land, and 30 kilometres of waterside frontage.

**Housing and Employment:** The Council will provide 37,500 homes between 2012 and 2027, and

<sup>8</sup> Habitat Regulations Assessment of the Submission Stage Hackney Core Strategy: Appropriate Assessment – Final Report (June 2009, updated 2010)

state that the Borough has capacity to create approximately 56,000 jobs to 2027. The London Plan identifies two Opportunity Areas covering the 'Arc of Opportunity', stretching from Stratford and the Olympic Park, down the Lee Valley and east through the Royal Docks. The London Plan states that these areas can typically each accommodate at least 5,000 jobs and 2500 homes or a mix of the two.

#### Summary HRA Findings<sup>9</sup>

The HRA concluded that none of the Core Strategy policies or sites were found 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.

In respect of cumulative impacts, the HRA concluded that:

- A review of the Local Development Framework being developed by London Borough of Newham did not find any potential policy or site allocation that would – in combination with another policy or site allocation in the Core Strategy or other Local Development Document – cause potential impact on the Natura 2000 sites identified in this Habitats Regulations Assessment.
- The Council has submitted a Joint Waste DPD (in collaboration with the London Borough's of Barking and Dagenham, Havering and Redbridge) which is scheduled to be adopted ahead of the Core Strategy. The Joint Waste DPD was subject HRA prior to submission. It is not considered that the Core Strategy and Joint Waste DPD will have a cumulative impact on any Natura 2000 site.
- The Council has adopted a number of area-based Supplementary Planning Documents (SPDs) - for Canning Town and Custom House and Forest Gate - and is developing an SPD for Stratford's town centre. It is not considered that the Core Strategy and these SPDs will have a cumulative impact on any Natura 2000 site.
- As the Core Strategy is scheduled to be adopted ahead of further Local Development Documents, the Council will be required to consider the potential impacts of these documents on the Nature 2000 in combination with the Core Strategy.

#### London Borough of Tower Hamlets: Core Strategy DPD (Adopted September 2010)

##### General summary

Tower Hamlets lies directly east of the City of London and south west of the Olympic Village and Stadium. The Borough aims to maximise the benefits and opportunities offered by 2012 Olympic and Paralympic Games and its legacy through:

- Working closely with the appropriate authorities including neighbouring boroughs, ODA, GLA, CLG, LTGDC and the LDA to ensure a collaborative approach to the planning and implementation of the Olympic Legacy.
- Regenerating Fish Island to facilitate a better connected place that responds to its surroundings by connecting Bow to the Olympic Legacy area, Stratford City and wider transport links. (See Fish Island vision p.102)
- Delivering High Street 2012 as a series of linked physical improvement projects, economic development, marketing and cultural projects.
- Assisting in the creation of the Lea River Park to link the Olympic Legacy area and Lea Valley Regional Park with the Thames through a series of public open spaces and footpaths.
- Significant investment in Victoria Park as a green space of regional importance.
- Taking full advantage of people visiting the borough as the "playground of the Olympics", to stimulate the local economy.
- Supporting our communities in participating in activities, sports and opportunities linked with the Olympics and the Olympic Legacy.
- Stimulating economic regeneration through the creation of new local employment,

<sup>9</sup> London Borough of Newham Local Development Framework: Habitats Regulations Assessment: Proposed Submission Core Strategy (February 2011)

enterprise and business opportunities.

**Housing:** The Council will seek to deliver 43,275 new homes (equating to 2,885 per year) from 2010 to 2025 in line with the housing targets set out in the London Plan. The majority of new housing will be focussed in the eastern part of the borough, in: Millwall, Canary Wharf, Cubitt Town, Poplar Riverside, Poplar, Leamouth, Blackwall, Bromley-by-Bow, and Fish Island. In addition, there will be direct public investment in housing, in line with the Housing Strategy, to facilitate the delivery of new housing in: Poplar Riverside, Bromley-by-Bow, Blackwall, Poplar, Stepney, Globe Town, Mile End, Bethnal Green, Shoreditch. 35%-50% affordable homes will be required on sites providing 10 new residential units or more.

**Employment:** Preferred office locations are identified in the Core Strategy: Canary Wharf, Bishopsgate road corridor, Aldgate, and around Tower Gateway public transport interchange. Support will be given to the three economic anchors of the City of London, Canary Wharf and Stratford. Whitechapel, Mile End and Blackwall are identified as Local Office Locations.

#### Summary HRA Findings<sup>10</sup>

The HRA concluded that the Core Strategy will not in itself result in any change to or effect on any European site. Nothing will happen unless and until there is both a more detailed DPD and a planning proposal for individual development sites. Whilst the Core Strategy can set a framework for these later decisions (and so to that extent influence them, as found in the Commission v UK decision), provided that framework makes it clear that (i) the requisite requirements of the Directive/Habitats Regulations will have to be satisfied at those later stages; and (ii) that the Core Strategy policies do not provide support for any proposal which would have an adverse effect on the integrity of any European site, the Core Strategy should not impact on any European site.

#### London Borough of Enfield: Core Strategy (Adopted November 2010)

##### General summary

The London Borough of Enfield covers 32 square miles of London's northern suburbs; housing occupies one-third, another third is Green Belt, mainly farming, country parks and horticulture. The rest includes commerce, industry, shops and transport - although much is open land used as parks, sports fields, golf courses, allotments and back gardens; and there are more waterways in Enfield than in any other London borough.

**Housing and Employment:** The Borough will plan for an increase in population from an estimated 285,100 in 2006 to approximately 309,500 by 2026. Over this period close to 11,000 new homes are planned to be built and the number of jobs will increase by a minimum of 6,000. This exceeds the current population projections for the Borough and the London Plan's current requirement for new homes; however it is consistent with Enfield's position in the London-Stansed-Cambridge-Peterborough growth corridor and the London Plan's designation of the Upper Lee Valley as an Opportunity Area.

Large scale growth and regeneration will be focused in four broad locations - Central Leaside and North East Enfield in the Upper Lee Valley, the area around the North Circular Road at New Southgate and the Borough's major town centre - Enfield Town.

#### Summary HRA Findings<sup>11</sup>

The HRA concluded that the majority of core policies are not likely to have a significant effect on European Sites. However, a number of policies refer to development in the Upper Lee Valley. Considering the proximity of Epping Forest SAC and the potential impacts on the portion of the Lee Valley SPA down stream of the area, likely significant effects cannot be ruled out at this time. Therefore, an Appropriate Assessment of the Central Leaside and North East Enfield Area Action Plans, which will dictate the type, amount and location of development in the area, will need to be conducted.

Consideration of 'in-combination' impacts of the Core Strategy, in light of current and future development trends in the surrounding areas, has concluded that the contribution of the Core

<sup>10</sup> Assessment of the Core Strategy under the Habitats Regulations – Screening Report London Borough of Tower Hamlets (August 2009)

<sup>11</sup> London Borough of Enfield Habitat Regulations Assessment: Appropriate Assessment Final Report for the Proposed Submission Core Strategy (December 2009)

Strategy will be minor. Impacts are likely to be mitigated by core policies that aim to protect and improve the environment and biodiversity, as well as by regulatory processes and by national, regional and local plans and projects designed to protect biodiversity of the European Sites.

#### London Borough of Haringey: Core Strategy Proposed Submission (May 2010) and Proposed Submission Fundamental Changes (November 2010)

##### General summary

Haringey Heartlands and Tottenham Hale will be the key locations for the largest amount of Haringey's future growth. Their significance lies in their location within the London-Stansted-Cambridge-Peterborough Growth Corridor and they are also identified in the London Plan as an Area for Intensification and an Area of Regeneration respectively. These areas are suitable for large scale redevelopment or significant increases in jobs and homes.

Regeneration of the wider Northumberland Park area (which includes the redevelopment of Tottenham Hotspur Football Club) and Seven Sisters Corridor will also provide a substantial number of jobs and new homes, as well as other community uses and facilities and estate regeneration. The Council's overall approach to growth in these areas is set out in Strategic Policy 1 Managing Growth.

**Housing:** The borough is expected to provide approximately 11,195 homes between 2011 and 2026.

**Employment:** Strategic Industrial Locations as identified in the London Plan are Tottenham Hale and Part of Central Leaside. Identified Locally Significant Industrial Sites are:

- Crusader Industrial Estate, N15;
- Cranford Way, N8;
- High Road West, N17;
- Lindens/Rosebery Works, N17;
- Queen Street, N17;
- South Tottenham, N15;
- Vale Road/Tewkesbury Road, N15; and
- White Hart Lane, N17

The Council published the Core Strategy Proposed Submission document in May 2010 to seek formal representations on the legal requirements and soundness of the document prior to submission to the Secretary of State for an Examination in Public by an Independent Planning Inspector. Some of the formal representations identified fundamental changes that sought a change in policy. As such points would need to be considered in detail as part of the Examination in Public, a paper was published for consultation in November 2010 detailing the fundamental changes to the affordable housing element of SP2 Housing and some employment land designations associated with SP8 Employment.

The affordable housing policy within the Proposed Submission Core Strategy stated that schemes of five or more units should provide 50% affordable housing on site. However, the Council's Affordable Housing Viability Study (which was issued after the consultation) recommends that the policy threshold is maintained at ten units. Therefore the Core Strategy housing policy was revised to reflect the Council's Affordable Housing Viability Study.

A number of representations were received during consultation seeking clarification on some of the employment land designations. The subsequent review identified sites that could have their current designations adjusted to adapt to the changing environment around them as well as to acknowledge the uses already there. The process will also identify the sites that require stronger protection to ensure there are sufficient sites to accommodate 'B' class uses.

##### Summary HRA Findings<sup>12</sup>

<sup>12</sup> London Borough of Haringey Pre-submission Core Strategy Habitats Regulations Assessment: Screening Report Update (April 2000)

The screening exercise determined that none of the policies within the Core Strategy were found likely to have a significant adverse impact on European Sites, therefore an Appropriate Assessment process is not considered necessary.

#### London Borough of Redbridge: Core Strategy (Adopted March 2008)

##### General summary

The London Borough of Redbridge forms part of the North East London sub-region, an area of regeneration focussed on the Thames Gateway London Partnership and London-Stansted-Cambridge-Peterborough growth corridors and to the regeneration of Stratford and the Lower Lea Valley associated with the 2012 Olympics.

New development within Redbridge will be focussing upon a hierarchy of town centres as follows:

- (a) The Metropolitan Centre of Ilford will be the primary area of growth within Redbridge, accommodating a range of new development including housing, retail, office and other commercial, cultural, health, leisure and community facilities.
- (b) In the District Centres of Barkingside, Gants Hill, South Woodford and Wanstead some new development will be permitted including housing, retail, office and other commercial, culture, health, leisure and community facilities.
- (c) The Local Centres of Woodford Broadway/Snakes Lane, Woodford Bridge, Manford Way, Seven Kings, Goodmayes, Ilford Lane and Newbury Park will provide a local level of retailing, community facilities and social meeting places.

New development will be expected to improve and enhance the public realm.

**Housing:** The London Plan sets a target of 9,050 new homes for Redbridge in the period from 2007/08 to 2016/17.

##### Summary HRA Findings

No HRA could be found.

#### Joint Waste Development Plan Document for the East London Waste Authority Boroughs: Submission Document (November 2010)

##### General summary

The purpose of the Joint Waste DPD is to set out a planning strategy to 2020 for sustainable waste management which enables the adequate provision of waste management facilities (including disposal) in appropriate locations for municipal and commercial & industrial waste having regard to the London Plan Borough level apportionment and construction, excavation & demolition and hazardous wastes. The Joint Waste DPD will form part of the LDF for each borough and help deliver the relevant elements of the Community Strategy for each borough.

The Joint Waste DPD is being developed by the four East London Waste Authority (ELWA) boroughs of LB Newham, Barking & Dagenham, Havering and Redbridge.

The London Plan identifies the amount of municipal and commercial waste to be managed by the ELWA boroughs as 1,394,847 tonnes at 2010; 1,847,421 tonnes at 2015 and 2,170,554 tonnes at 2020. The ELWA boroughs will meet this apportionment by:

- (i) Safeguarding the capacity of existing waste management facilities listed in Schedule 1 and supporting increased operational efficiency encouraging increased processing of waste at these facilities, to run at a higher figure towards the licensed capacity; and
- (ii) Approving strategic waste management facilities where it will contribute to the ELWA boroughs meeting the London Plan apportionment on sites within the locations listed in Schedule 2.

##### Summary HRA Findings<sup>13</sup>

The HRA concluded that none of the Joint Waste DPD policies or sites were found 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.

<sup>13</sup> Joint Waste Development Plan Document for the East London Waste Authority Boroughs Habitats Regulations Assessment (HRA) of the Submission Document (November 2010)

## London Plan (Spatial Development Strategy for Greater London) (July 2011)

### General summary

Strategic planning in London is the shared responsibility of the Mayor of London, 32 London boroughs and the Corporation of the City of London. Under the legislation establishing the Greater London Authority (GLA), the Mayor has to produce a spatial development strategy (SDS) – which has become known as ‘the London Plan’ – and to keep it under review. Boroughs’ local development documents have to be ‘in general conformity’ with the London Plan, which is also legally part of the development plan that has to be taken into account when planning decisions are taken in any part of London unless there are planning reasons why it should not. The general objectives for the London Plan, and the process for drawing it up, altering and replacing it, are set out in the Greater London Authority Act 1999 (as amended), detailed regulations and guidance in Government Office for London Circular 1/2008.

The London Plan seeks to accommodate major growth in the North East London sub-region. It links this to the wider regeneration efforts planned for the Thames Gateway London Partnership and London-Stansted-Cambridge-Peterborough growth corridors and to the regeneration of Stratford and the Lower Lea Valley associated with the 2012 Olympics.

### Summary HRA Findings<sup>14</sup>

The HRA identified many policies / proposals for which it can be concluded there would be no likely significant effects. Policies / proposals which could give rise to ‘likely significant effect’ on European Sites were identified, where it could not be concluded that, at the present stage, they would have no likely significant effects.

The HRA concluded that the main potential effects are likely to arise from increased visitor pressure brought about through development and infrastructure in key areas and air quality effects, for example from development through the waste strategy. These have been addressed by the inclusion of an overarching policy statement to ensure the avoidance of adverse impacts to the integrity of all the European Sites and also through providing details of likely scope of lower tier assessment, for example for housing provision and waste and aggregate provision. Reference is also specifically made to Opportunity and Intensification areas with the inclusion of additional wording for each of the identified areas in Annex I of the London Plan.

## Olympic and Legacy Transformation Planning Application (2007)

### General summary

The Olympic and Legacy Transformation Planning Application is for development in connection with the 2012 Olympic Games and Paralympic Games and Legacy Transformation, involving:

**Purposes for the Games:** Earthworks to finished levels; Sports, leisure and entertainment venues within class D2, (including ancillary service areas); Olympic Cauldron; Open space and circulation areas (involving soft and hard landscaping and associated structures); Under and over bridges; Utility structures (including wind turbine, pumping stations, electricity substation, telecommunication masts, Channel Tunnel Rail Link cooling box, an Energy Centre (including a Combined Cooling and Heating Plant and biomass boilers); Construction of buildings for use within classes A1, A2, A3, A4, A5; Construction of building for use as the International Broadcast Centre / Main Press Centre (Including B1/B2) and Multi Storey car park; Erection of a perimeter enclosure for the period of the works; and Temporary coach parking areas.

In the period following the Games, the Legacy Transformation Phase involving:

Reconfiguration of road network to form Legacy distributor and local roads, cycleways, pedestrian footways and ancillary parking areas; Dismantling and reconfiguration to form buildings within classes B1, B2 and B8; Partial deconstruction, demolition, dismantling and construction of venues to form legacy sports, leisure and entertainment venues, servicing facilities, car parking, vehicular access and ancillary works for use within classes D1 and D2; and of over and under bridges and buildings and structures (including telecommunication masts); Engineering earthworks involving the reconfiguration of levels and the laying out to provide permanent public open space (including outdoor sports facilities, play facilities, cycle circuit and ancillary facilities), allotments and sites for

<sup>14</sup> Consultation draft replacement London Plan (Spatial Development Strategy for Greater London) Habitats Regulations Assessment Screening Report (October 2009)

future development; and Erection of perimeter enclosure.
<b>Summary HRA Findings<sup>15</sup></b>
<p>The HRA concluded that there are two Natura 2000 sites (Special Areas for Conservation and Special Protection Areas) within 5km of the Lower Lea Valley Olympics and Legacy Facilities site. These are the Lee Valley SPA / Ramsar site and the Epping Forest SAC. Potential for effects on the Natura 2000 sites resulting from the Lower Lea Valley Olympics and Legacy Facilities scheme has been reviewed.</p> <p>It is not considered likely that the scheme, either alone or in combination with other projects, will have any significant direct or indirect effects on either Natura 2000 site. It is, therefore, concluded that Appropriate Assessment in accordance with the Habitats Regulations 1994 is not required in relation to the proposed development.</p>
<b>Fatwalk</b>
<b>General summary</b>
<p>'The Fatwalk' will be the backbone of the Lea River Park, a large path connecting the River Thames at East India Dock Basin to the Olympic Park. Users will be able to walk or cycle along this length of new parkland, experiencing different activities along the way. 'The Fatwalk' is Phase I of the overall Lea River Park proposal, comprising six kilometres of parkland along the River Lea with footpaths and cycleways, new bridges and towpaths, aiming to be complete by 2012.</p>

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<sup>15</sup> Olympic Delivery Authority Lower Lea Valley Olympic and Legacy Facilities Planning Applications 2007 Appropriate Assessment Screening Report (December 2006)

