

# **Proposed Submission Central Leaside Area Action Plan**

## **Habitats Regulation Assessment**

### **November 2014**

#### **1.0 Background**

- 1.1 This report documents the assessment, under the Habitats Directive, of whether any likely significant effects would result from the proposals contained within the Local Plan document Central Leaside Area Action Plan, in relation to Special Protection Areas, Special Areas of Conservation or Ramsar Sites, whether in isolation or in combination with other plans and projects.

#### **2.0 Requirements for Plan Assessment**

- 2.1 Article 6 of the European Habitats Directive (92/43/ EEC) is the means by which the European Union meets its obligations in relation to natural habitats, flora and fauna under the Bern Convention. The main provision of the Directive which is relevant to this report is concerned with the assessment and review of plans and projects which have the potential to affect Natura 2000 sites. Natura 2000 sites include: Special Protection Areas established in accordance with the requirements of the Birds Directive (2009/147/EC as amended) and Special Areas of Conservation established in accordance with the requirements of the Habitats Directive. The term 'European Site' is defined in Regulation 8 of the Habitats Regulations; in practice this term includes Natura 2000 sites and any site over which the provisions of the Habitats Regulations have influence. Natura 2000 sites are referred to as "European Sites" in the remainder of this report.
- 2.2 Articles 6(3) and 6(4) of the Habitats Directive state:
- 6 (3) Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public.
  - 6 (4) If, in spite of a negative assessment of the implications for the site and in the absence of alternative solutions, a plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of a social or economic nature, the Member State shall take all compensatory measures necessary to ensure that the overall coherence of Natura 2000 is protected. It shall inform the Commission of the compensatory measures adopted. Where the site concerned hosts a priority natural habitat type and/or priority species, the only considerations which may be raised are those relating to human health or public safety, of beneficial consequences of

primary importance for the environment or, further to an opinion from the Commission, to other imperative reasons of overriding public interest.

- 2.3 The Conservation of Habitats and Species Regulations 2010 (as amended) (Habitats Regulations) transpose into domestic legislation obligations associated with both the European Birds Directive and the Habitats Directive. Regulation 102 of the Habitats Regulations is the most pertinent in relation to this report. Regulation 102(1) states:

Where a land use plan—

- (a) is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and
  - (b) is not directly connected with or necessary to the management of the site,
- the plan-making authority for that plan must, before the plan is given effect, make an appropriate assessment of the implications for the site in view of that site's conservation objectives.

### **3.0 The Purpose of this report**

- 3.1 This report presents the HRA for the Proposed Submission Central Leaside Area Action Plan (AAP). It sets out the methodology for the HRA, determines the European Sites that require consideration with regards to potential effects arising from the AAP, and then goes through the assessment process, considering likely significant effects on relevant European Sites, and provides a conclusion. Throughout this report the term 'Habitats Regulations Assessment' covers the whole process required under the Habitats Regulations.
- 3.2 Consultation on this report will be undertaken as part of the consultation for the Proposed Submission Central Leaside AAP.
- 3.3 It should be noted that within the Central Leaside AAP area and its immediate surroundings there are other sites of nature conservation importance which are not European Sites. These other sites are not considered in this report, which deals with the HRA process only, and therefore necessarily focuses on the European Sites to which the Habitats Regulations refer. The policies map within the Central Leaside AAP identifies sites of conservation interest in the area. All forthcoming development within the AAP area should ensure that the presence of sites or species of nature conservation interest are fully taken into account, in accordance with the National Planning Policy Framework and other relevant planning guidance and legislation.

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### **4.0 Approach to Plan Assessment**

- 4.1 Over recent years various organisations have produced several pieces of guidance relating to the application of the Habitats Directive and the Habitats Regulations. Until recently, however, no single piece of guidance has provided a clear approach to the methodology for HRA. The approach to the HRA used in this report is that set out recently in the Habitats Regulations Assessment Handbook (DTA Publications Ltd, 2014). The Handbook provides a regularly updated source of guidance on the understanding and interpretation of the Habitats

Regulations and consistency in applying their requirements in respect of plans and projects. It is considered that this is the best practice methodology currently available for HRA.

4.2 The approach to the HRA process set out the Handbook is related directly to Articles 6(3) and 6(4) of the Habitats Directive and is divided into four stages:

- Stage 1: Screening – Screening plans and projects to see if they would be likely to have a significant effect on a European site
- Stage 2: Appropriate Assessment and the Integrity test – Undertaking an ‘appropriate assessment’ and ascertaining whether the plan or project would have a significant adverse effect on the integrity of the European site
- Stage 3: Alternative solutions – Deciding whether there are alternative solutions which would avoid or have a lesser effect on the European site
- Stage 4: Imperative reasons of overriding public interest and compensatory measures – considering imperative reasons of overriding public interest and securing compensation

4.3 These four stages are separate to each other and follow on from each other only if the conclusion of the proceeding stage is such that further assessment is required to meet the requirements of the legislation.

4.4 To inform stage 1 of the HRA process, and for each of the subsequent stages where these are required, it is necessary to:

- Identify the European Sites in and around the plan area;
- Identify and list the qualifying features for these sites;
- Determine the conservation objectives in respect of each qualifying feature; and
- Determine the conservation status of the qualifying features, their condition and the factors influencing them.

4.5 This information is gathered from citations, condition assessments and other reports produced for the European Sites by Natural England and JNCC. The information regarding the European Sites is used to determine the vulnerability of the European Sites to potential effects arising from the Central Leaside AAP.

4.6 The approach to the first stage of the Habitats Regulations Assessment (screening) takes into account the considerations discussed above with reference to all policies within the Proposed Submission Central Leaside AAP and their potential and/or likely significant effects on the interest of the European sites identified as being within the zone of influence of the AAP. Each of the policies within the Proposed Submission Central Leaside AAP is allocated to one of twelve screening categories which determine whether or not the policies should be screened out from further consideration or taken forward in the HRA process. The twelve categories are described in the Habitats Regulations Assessment Handbook (DTA Publications Ltd, 2014) and set out in Appendix 1.

## 5.0 In combination effects

5.1 The Habitats Regulations require the consideration of effects “in-combination with other plans or projects”. The most relevant of these are likely to be the other Enfield development

plans, the development plans of surrounding boroughs, and London-wide plans, as the potential impacts of these plans will be similar and therefore mutually reinforcing.

- 5.2 The plans, reports and projects considered in the production of the Proposed Submission Central Leaside AAP (insofar as relevant to the Habitats Directive/Regulations) and this HRA are listed in full in the AAP. Additional references used to provide an evidence base for this HRA are listed in full in Appendix 2 of this report.

## 6.0 Screening the Plan

- 6.1 A plan can only be exempt from consideration under HRA if the whole of the plan is directly connected with or necessary to the management of the site for its conservation purposes. Since this is not the purpose of the Central Leaside AAP it cannot be exempt from consideration under HRA for this reason.
- 6.2 Furthermore, the assessment for the Core Strategy (2010) indicated that a further assessment would be required for Central Leaside to determine whether there are any likely significant effects resulting from the proposals.
- 6.3 The next stage of the screening process is to determine whether the plan would be likely to have a significant effect on a European site, either alone or in combination with other projects. In order to consider this, information about the European Sites that could be potentially affected by the Central Leaside AAP must be collated and reviewed.

## 7.0 Screening for European Sites

- 7.1 There is no clear guidance on which European Sites should be taken into consideration in the HRA for a plan or project. However, it is clear that any sites within a plan area should be taken into consideration and also that sites within a likely zone of influence should be taken into consideration. Whilst the AAP area lies within the urban zone of greater London and does not in itself support any European Sites, the high-density urban nature of the area creates the potential for indirect effects as a result of plan policies, particularly where the plan area is in proximity to those sites which could be affected by issues which cover a potentially wide zone of influence; such as air pollution effects, aquatic environments, or sites supporting species susceptible to recreational disturbance. For this reason, all European Sites within 15km of the Central Leaside AAP have been considered as part of this HRA. The information relating to the qualifying features, conservation status and condition assessment of the relevant European Sites have all been taken from the latest version of relevant documentation held on the JNCC and Natural England websites.
- 7.2 Table 1 below lists the European Sites within 15km of the AAP area. Appendix 3 shows the locations of these sites in relation to the borough.

**Table 1: European Sites within 15km of the Central Leaside AAP area**

| Site                                  | Qualifying Features (Reasons for Designation)*  |
|---------------------------------------|---|
| Epping Forest SAC<br>(Special Area of | The habitats and species which are the primary reason for the designation of this site are: Atlantic acidophilous beech |



|   |   |
|---|---|
| Conservation)   | <p><i>Fagus sylvatica</i> forests with holly <i>Ilex auifolium</i> and sometimes also yew <i>Taxus baccata</i> in the shrub layer, and the stag beetle <i>Lucanus cervus</i>.</p> <p>Habitats present as a qualifying feature, but not a primary reason for the designation of the site are: northern Atlantic we heaths with cross-leaved heath <i>Eirca tetralix</i> and European dry heaths.</p>   |
| Lee Valley SPA<br>(Special Protection Area and Ramsar site) | <p>Open water/Standing waters/canals and surrounding marginal habitats. The site qualifies as an SPA by supporting overwintering populations of European importance for the following species: bittern, gadwall and shoveler.</p> <p>The site also qualifies as a Ramsar site due to the presence of vulnerable, endangered or critically endangered species (bittern) and as it regularly supports 1% of the individuals in a population of one species or subspecies or waterbird (gadwall and shoveler).</p> |
| Wormley<br>Hoddesdonpark<br>Woods SAC                       | <p>The habitat which is the primary reason for the designation of this site is broadleaved mixed lowland woodland: sub-Atlantic and medio-European oak <i>Quercus petraea</i> or oak-hornbeam <i>Carpinus betula</i> forests.</p>   |

\* When undertaking an assessment of effects at a site, all features of European importance (both primary and non-primary) need to be considered.

- 7.3 In analysing the potential effects of the Central Leaside AAP on these European Sites it is important to consider the conservation objectives of the sites and their condition such that the vulnerabilities of the sites can be taken into consideration as part of the HRA (see Appendix 4). It is this information that is used to determine the potential for the AAP to have a significant effect on the European Sites.
- 7.4 Ramsar sites do not have agreed conservation objectives, but as Lee Valley Ramsar overlaps with the Lee Valley SPA boundary, it is the conservation objectives of the SPA that are presented in this case. The conservation objectives for SPAs and SACs are set by Natural England and published on their website. The condition assessment and factors affecting conservation status are taken jointly from a review of the condition assessments made of the Sites of Special Scientific Interest Units that make up the European Sites and the reports made by JNCC to the European Union regarding the vulnerabilities of the European Sites.

## 8.0 Vulnerabilities

- 8.1 All of the European Sites included in this HRA lie outside of the boundary of the Central Leaside AAP, and of the borough, and therefore potential effects associated with the plan are those where links can be made between activities resulting from the AAP and the vulnerabilities of the interest features of the European Sites.

- 8.2 Taking into account the qualifying features of the European Sites, their condition and conservation objectives (as set out in the Appendix 4) and the most likely issues arising from a land use plan, the key issues that could result in a potential effect on the European Sites within the zone of influence of the AAP are summarised in Table 2 below.

**Table 2: European Site Vulnerabilities**

| European Site                   | Potential effects associated with the Central Leaside AAP  |
|---------------------------------|--|
| Epping Forest SAC               | Habitat loss/ damage from recreation pressures; air pollution issues (deposition of nitrogen and acidifying rain). |
| Lee Valley SPA and Ramsar site) | Disturbance of birds from recreation and/ or development pressures; water level and water quality issues.          |
| Wormley Hoddesdonpark Woods SAC | Habitat loss/ damage from recreation pressure.   |

- 8.3 The vulnerabilities of the European Sites in the zone of influence of the Proposed Submission Central Leaside AAP were used to consider of each of the policies of the AAP to determine whether the policies are likely to result in a significant effect on the qualifying features of any of the European Sites, and a table at Appendix 5 sets out the results of this assessment, with reference to the categories given in Appendix 1.
- 8.4 Discussion of the vulnerabilities set out in Table 2 above, including in-combination effects with other policies and plans, are considered in the sections below.

### **Assessing Potential Effects of the Central Leaside AAP Individual Policies and the In-Combination Issues**

#### **9.0 Air pollution**

- 9.1 There is potential for air pollution to have negative impacts on all of the identified European Sites, either directly, as in the case of Epping Forest or Wormley-Hoddesdonpark Woods, or through precipitation leading to water pollution in the Lee Valley SPA. Air pollution effects are identified as a particular vulnerability associated with Epping Forest SAC (Natural England, 2013).
- 9.2 Traffic forms the principle source of air pollution, with emissions including carbon monoxide, oxides of nitrogen, volatile organic compounds and small particles. Increased population in Central Leaside as a result of policies in the AAP, in combination with development elsewhere, could lead to increased road traffic both within the borough, and on roads outside of the borough that are adjacent to European Sites.

- 9.3 It must be considered, however, that pollution from vehicular traffic is highly localised and decreases exponentially with distance from the source. Given that there are no European Sites within the AAP or borough boundary, the potential for impacts upon them is therefore greatly reduced.
- 9.4 Furthermore, the Central Leaside AAP includes policies which support significant increases in public transport use, including the upgrade to Angel Road Station and improved bus routes. AAP policies will also encourage a modal shift towards journeys being made by foot and bicycle. The combined effect of the policies is to reduce the use of private car transport, helping to reduce outputs from traffic sources such as nitrogen dioxide.
- 9.5 Central Leaside AAP policies relating to the incinerator and Edmonton EcoPark and the Lee Valley Heat Network (LVHN) should also help to reduce air pollution. This is in line with the Mayor of London's Air Quality Strategy (Great London Authority, 2010) and other relevant guidance and legislation relating to air quality requirements.
- 9.6 Air quality is also addressed by a range of policies in the London Plan, and other Local Plan documents, for example policy DMD 65.
- 9.7 In combination, the Central Leaside AAP policies and other document policies will ensure no significant effects on the Epping Forest SAC, or other European Sites, as a result of implementation of the AAP, either alone or in combination. The AAP policies have therefore been scoped out from further consideration in the HRA process.

## **10.0 Water levels and quality**

- 10.1 Lee Valley SPA is part of a network of waterbodies and waterways that form the Lee Valley Regional Park. Adverse changes to water levels and water quality are identified as potential factors that could affect the conservation status of the SSSI (Natural England 2013); this could also affect the integrity of the SPA. The key issues that could affect water levels and quality relate to abstraction of surface water for public supply and waste water affecting the water quality through eutrophication.
- 10.2 The need for development in south east England is not only identified in the Central Leaside AAP but also in plans for the whole south east. This is acknowledged in the River Basin Management Plan (RBMP) for the Thames Basin (within which the Lee Valley sits) that has been prepared under the Water Framework Directive by the Environment Agency (Environment Agency, 2009). The RBMP focuses on the measures required to achieve the protection, improvement and sustainable use of the water environment.
- 10.3 ~~Central Leaside AAP policy CL 23 on Deephams Sewage Treatment Works supports the redevelopment of the site to meet Environment Agency discharge requirements, which will have a positive effect upon river water quality, including downstream at the Lee Valley SPA.~~
- 10.4 The AAP, through policy CL16, identifies the need to work with the Environment Agency, Thames Water, and other parties which are responsible for the management of development and flood risk, to secure an integrated and sustainable approach to the management of development and flood risk through complementary flood mitigation and water management measures. This will ensure that development within the Central Leaside AAP is brought forward in such a way so as to avoid any adverse effects on the integrity of the European

Sites in the area, in particular the Lee Valley SPA. Water quality is also addressed by a range of policies in the London Plan, and other Local Plan documents.

- 10.5 Given these measures and the commitments given within the Central Leaside AAP, no significant effects are anticipated as likely to arise as a result of the AAP, either alone or in combination, and therefore this plan does not require further consideration in the HRA process.

## **11.0 Disturbance and other effects from development**

- 11.1 The Central Leaside AAP policies assume development along the waterfront at the Meridian Water site, including policies CL7, CL8, CL9 and CL10. Proposals include development to create new uses along the waterfront, with greatly improved access linking into the Lee Valley Regional Park. Whilst disturbance from construction or recreation associated with this proposed development is unlikely to have a significant effect on the Lee Valley SPA interest, due to the distance from the site, other indirect effects associated with development need careful consideration to ensure no significant effects on the interest of the Lee Valley SPA. Policy CL9 The Parklands, establishes the importance of natural green areas within the Meridian Water development, including that areas should be left inaccessible to further increase the biodiversity potential.
- 11.2 No significant effects are anticipated as a result of the Central Leaside AAP, either alone or in combination, on the interest of the Lee Valley SPA and therefore this issue has been scoped out from further consideration in the HRA process.

## **12.0 Disturbance from Recreation**

- 12.1 The Central Leaside AAP establishes the Meridian Water area as the key location for housing development within Central Leaside, as set out in the adopted Core Policy 2: Housing supply and location for new homes, and Core Policy 37 Central Leaside, for up to 5,000 new homes. The development of new housing will result in an increased population in the plan area once implemented. There are also policies designed to encourage access and improve connectivity between the Lee Valley Regional Park (LVRP) and the Central Leaside area, for example policies CL1, CL26 and CL27. These factors could potentially lead to increased disturbance as a result of increased recreation pressure on the Lee Valley SPA (which forms part of the LVRP); in particular the wintering bird populations for which the SPA is designated.
- 12.2 As set out in Table 1 above, the interest of the Lee Valley SPA is associated with its use in winter by three bird species: bittern, gadwall and shoveler.
- 12.3 The Lee Valley SPA is situated well to the south and to the north of the Central Leaside AAP, but within a complex of waterbodies along the Lee Valley which include the William Girling Reservoir, which is itself adjacent to the Central Leaside AAP. The William Girling Reservoir is part of the Chingford Reservoirs SSSI, which is designated as one of the major wintering grounds for wildfowl and wetland birds in the London area and holds nationally important numbers of some species. This includes wintering populations of shoveler (but no Gadwall) so there is a possibility, given that shoveler is known to use a complex of



waterbodies (Briggs et al., 2012) that the William Girling Reservoir could provide a supporting role to the interest of the SPA.

- 12.4 A study of a reservoir complex in south west London showed that disturbance levels and food resources both strongly influenced habitat use by gadwall and shoveler, and that birds responded sensitively to changes in these and other environmental variables (Briggs et al. 2012). Gadwall tended to use one or neighbouring waterbodies almost exclusively, favouring those with low disturbance levels and/or with refuge areas within them. Meanwhile, shoveler used a complex of waterbodies and it was postulated that movements between waterbodies by shoveler were prompted by both food availability and disturbance (Briggs et al., 2012). However, recent numbers of shoveler recorded using the William Girling Reservoir (average number 20.25 (Natural England, assessed July 2012)) do not support this view. The low number of shoveler in recent years is not attributed to management of the reservoirs and may be affected by background population trends or site preference (Natural England, 2013). Natural England and Thames Water are investigating wintering bird data in detail to establish possible causes, and it has been agreed that site conditions will be maintained at current levels in order to provide continued opportunity for use by wintering birds. Increased monitoring effort has also been agreed (Natural England, 2013). However, immediate recreational effects on the William Girling Reservoir are not of concern in relation to the interest of the SPA.
- 12.5 The bittern is perhaps the most susceptible to disturbance as it is known to be a secretive species (RSPB, undated). William Girling Reservoir is not known to support this species, nor does the reservoir support the extensive areas of reedbed favoured by this species as wintering habitat in the Lee Valley (Harris, 2006). Therefore the William Girling Reservoir is unlikely to support this species, and is unlikely to provide a significant supporting role to those areas of the Lee Valley Park that do.
- 12.6 Whilst effects of policy on the William Girling Reservoir adjoining the Central Leaside AAP do not appear to be of concern in relation to the supporting role that the reservoir plays to the interest of the Lee Valley SPA, the potential effects of the Central Leaside AAP on the interest of the European Sites themselves in relation to increased disturbance from recreational use remain, given the proximity of the sites to the Central Leaside AAP area. This is particularly the case for the Lee Valley SPA which has been identified as being vulnerable to recreational disturbance. To mitigate any potential effects, policies CL24 and CL25 support Enfield Council working with the Lee Valley Regional Park Authority on proposals for the Picketts Lock site.
- 12.7 The Lee Valley Park Development Framework sets out what the Lee Valley Regional Park Authority (LVRPA) wants to achieve within the Lee Valley and how the LVRPA plan to balance competing demands. Whilst some elements of the Framework are yet to be finalised, the LVRPA is committed to management of the Park to improve visitor access whilst protecting the biodiversity interest of the Park; particularly those areas which lie within the Lee Valley Special Protection Area and Sites of Special Scientific Interest (LVRPA, 2010; UE Associates, 2009). Given these measures and the policy approach of the Central Leaside AAP, no significant effects relating to disturbance of the interest of the Lee Valley SPA are anticipated as a result of the Central Leaside AAP policies, either alone or in combination, and therefore these policies have been scoped out from further consideration in the HRA process.

### 13.0 Damage from recreation

- 13.1 The Natural England condition assessment report for Epping Forest identifies that recreation pressure is having an adverse effect on some parts of the site, but that this is limited to a small area (parts of units 130 and 136 towards the southern end of Epping Forest). Similarly, the Wormley Hoddesdonpark Woods condition assessment report identifies small-scale refuse tipping and inappropriate use by off-road vehicles in small areas. There is the potential that proposed development within the Central Leaside AAP area, in combination with other policies or proposals for development in and around the borough, could result in increased recreational use by the general public of the two sites European Sites identified above.
- 13.2 The Epping Forest SAC and Wormley Hoddesdonpark Woods SAC are both subject to management plans which aim to maintain and enhance the ecological interest of each site. The Corporation of London own and manage Epping Forest. An updated Management Plan for Epping Forest is being finalised, but current management work is following the previous management plan (2004-2010) until this comes into effect ([www.cityoflondon.gov.uk](http://www.cityoflondon.gov.uk)).
- 13.3 Wormley Hoddesdonpark Woods form part of the Broxbourne Woods National Nature Reserve (NNR). The NNR is jointly managed by the current owners: Hertfordshire County Council owns Broxbourne Wood and Bencroft Wood, while the Woodland Trust owns Hoddesdonpark Wood and Wormley Wood. Both are approved to manage these woodlands by Natural England under Section 35 of the Wildlife and Countryside Act, 1981 (as amended). Hoddesdonpark Woods and Wormley Woods have their own management plans put together by the Woodland Trust. These management plans provide good information about the woodlands and identify the opportunities to encourage and facilitate use of the woodlands by the public without damaging their interest, through the provision of informative displays, well-signed paths and literature.
- 13.4 Central Leaside AAP has the potential for indirect effects on the European Sites discussed above as a result of housing development within Meridian Water along with the associated increased population, and greater access to the European Sites via improved links across the Lee Valley. The AAP does not, however, contain any policy which is likely to direct recreational users towards any of the identified European Sites. Furthermore, the AAP area and the borough contain a number of destinations and facilities, such as Picketts Lock, which are in closer proximity to the AAP area compared to the European Sites and which will be improved as part of the implementation of the AAP. These sites will allow the recreational demand to be absorbed within the AAP and borough. Considering these factors, and that the woods are some distance from the AAP, no significant effects relating to damage from recreational use are anticipated as a result of this policy, either alone or in combination.

### 14.0 Conclusions

- 14.1 Consideration of the policies in the Proposed Submission Central Leaside AAP indicates that all likely significant effects, alone or in combination, on European Sites within the zone of influence of the AAP area, have been avoided. The AAP provides an appropriate framework for future development and regeneration in Central Leaside whilst avoiding the potential for likely significant effects on European Sites. There is therefore no requirement for the Habitats Regulations Assessment process to further consider potential effects of the Central Leaside AAP on European Sites.



**Appendix 1 – Screening Categories**

| <b>Category</b> | <b>Description</b>  |
|-----------------|---|
| A               | General statement of Policy / General – the European Commission recognises that policies which are no more than general statements of policy or general political aspirations should be screened out from further consideration.  |
| B               | Policies listing general criteria for testing the acceptability/sustainability of proposals should be screened out from further consideration.  |
| C               | Proposals referred to but not proposed by the plan under consideration should be screened out from further consideration  |
| D               | Environment protection or site-safeguarding policies can be screened out from further consideration because the implementation of the policies is likely to protect rather than adversely affect European Sites and not undermine their conservation objectives.  |
| E               | Policies or proposals that steer change in such a way as to protect European Sites from adverse effects whose qualifying features may be otherwise affected by change can be screened out from further consideration.   |
| F               | Policies or proposals that cannot lead to development or other change (e.g. design principles, layout or materials) can be screened out from further consideration.   |
| G               | Policies or proposals that could not have any conceivable adverse effects on a site because there is no causal link between them and the qualifying features of a European site. Alternatively there may be policies or proposals that would only have positive effects or would not otherwise undermine the conservation objectives for the site can be screened out from further consideration. |
| H               | Policies or proposals the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in combination) of the European site(s) can be screened out from further consideration.  |
| I               | Policies or proposals with a likely significant effect on a European site alone need to be taken further in the HRA process (screened in).  |
| J               | Policies or proposals not likely to have a significant effect alone – these aspects of a plan would have some adverse effects on a European site's conservation objectives but the effect is not likely to be significant, so they must be checked for in-combination effects (see K and L below) (screened in).  |
| K               | Policies or proposals not likely to have a significant effect alone or in combination should be screened out from further consideration.  |
| L               | Policies or proposals likely to have a significant effect in combination need to be taken further in the HRA process (screened in).   |

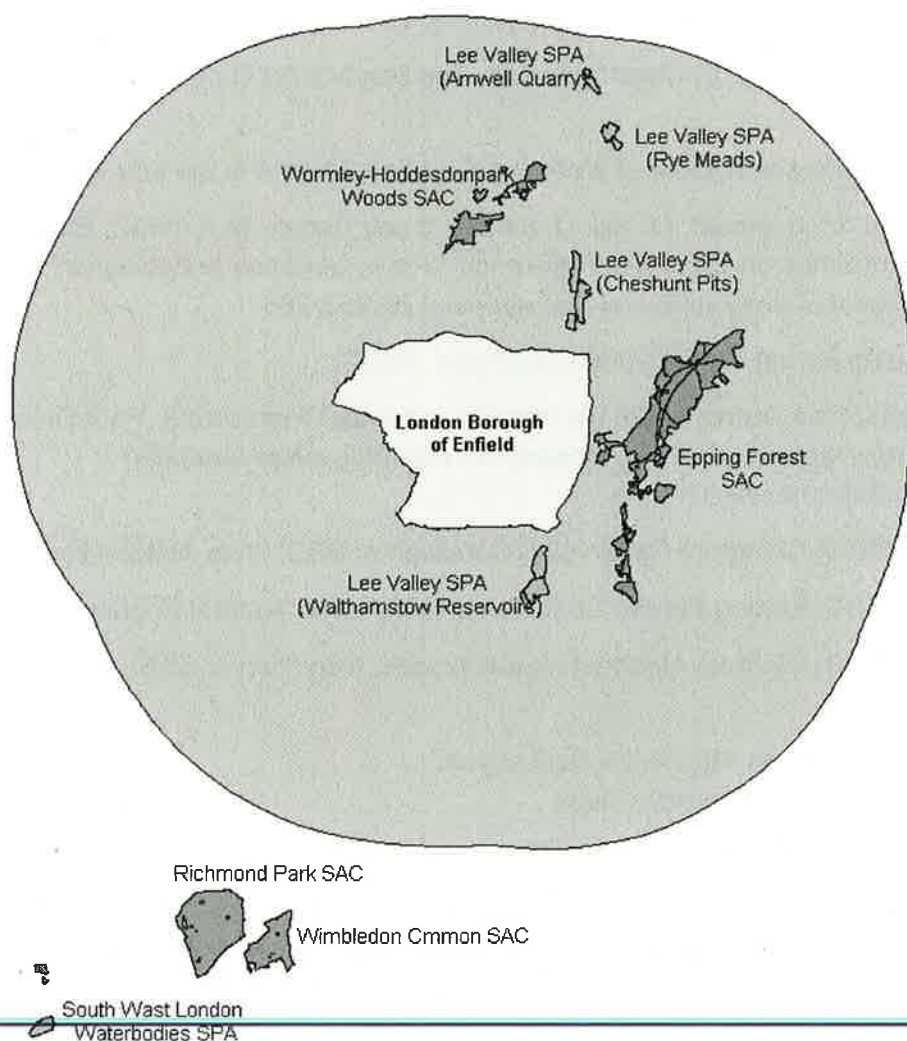


## Appendix 2 – References

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### Appendix 3 - Location Map of European Sites

Map 1: European Sites Within 15Km of the Borough Boundary



**Appendix 4 - Conservation Objectives and Condition of European Sites**

| <b>European Site</b>            | <b>Conservation Objectives</b>   | <b>Condition Assessment and factors influencing conservation status</b>  |
|---------------------------------|--|--|
| Epping Forest SAC               | <p>Avoid the deterioration of the qualifying natural habitats and the habitats of qualifying species, and the significant disturbance of those qualifying species, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving Favourable Conservation Status of each of the qualifying features.</p> <p>Subject to natural change to maintain or restore:</p> <ul style="list-style-type: none"> <li>- The extent and distribution of qualifying natural habitats and habitats of qualifying species.</li> <li>- The structure and function (including typical species) of qualifying natural habitats and habitats of qualifying species.</li> <li>- The supporting process on which qualifying natural habitats and habitats of qualifying species rely</li> <li>- The populations of qualifying species</li> <li>- The distribution of qualifying species within the site.</li> </ul> | <p>The Epping Forest SSSI has almost the same boundary as the SAC; two small parts of the Forest to the north and south of the main parts of the SSSI are not included within the SAC. The SSSI condition assessment report by Natural England (December 2013) recorded that the majority of the units within the SSSI in the SAC boundary are in an unfavourable condition, although many of these are 'unfavourable recovering'.</p> <p>The potential threats to the site which could influence the conservation status of the habitats and species for which the SAC are designated include:</p> <p>Air pollution and, in particular, the effects of excessive levels of oxides of nitrogen and pollutants, and the related deposition of acidity and of nitrogen. Many veteran trees display clear symptoms of stress (e.g. thin canopy and die-back of leading shoots), there is excessive growth of bramble, and there are dense stands of nettles along road sides, heathland areas show excessive growth of grasses;</p> <p>Habitat management and grazing management is require to optimise the ecological interest of the site in some units;</p> <p>Recreation pressure is having an adverse effect on some parts of the site (SSSI units 130 and 136 towards the southern end of Epping Forest).</p> |
| Lee Valley SPA and Ramsar site) | <p>Avoid the deterioration of the habitats of the qualifying features, and the significant disturbance of the qualifying features, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving the aims of the Birds Directive.</p> <p>Subject to natural change, to maintain or restore:</p>   | <p>The Walthamstow Reservoirs SSSI has the same boundary as the Lee Valley SPA and Ramsar. The SSSI condition assessment report by Natural England (December 2013) has recorded the SSSI as being in an 'unfavourable recovering' condition. This reports a slight fall in the number of breeding grey heron and tufted duck. Wintering cormorant, shoveler and tufted duck and breeding pochard remain favourable. However, the condition assessment report states that the site is in good condition and the fall in numbers is</p>  |

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|                                 | <ul style="list-style-type: none"> <li>- The extent and distribution of the habitats of the qualifying features;</li> <li>- The structure and function of the habitats of the qualifying features</li> <li>- The supporting processes on which qualifying natural habitats and habitats of qualifying species rely;</li> <li>- The populations of qualifying species</li> <li>- The distribution of qualifying species within the site.</li> </ul>  | <p>no reflection of the management. This indicates that the species which are qualifying features of the SPA and Ramsar remain favourable. No mention is made of bittern.</p> <p>The potential threats to the site which could influence the conservation status of the species for which the SPA is designated include:</p> <p>Maintenance of water levels and water quality;</p> <p>Impacts associated with recreational activities;</p> <p>Maintenance of mosaic of habitat types to provide refuge, foraging, breeding, etc. opportunities for species that use the site.</p>  |
| Wormley Hoddesdonpark Woods SAC | <p>Avoid the deterioration of the qualifying habitats and the habitats of qualifying species, and the significant disturbance of those qualifying species, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving Favourable Conservation Status of each of the qualifying features.</p> <p>Subject to natural change, to maintain or restore:</p> <ul style="list-style-type: none"> <li>- The extent and distribution of the habitats of qualifying natural habitats and habitats of qualifying species;</li> <li>- The structure and function (including typical species) of qualifying natural habitats and habitats of qualifying species</li> </ul> | <p>All the SSSI units for these woods also fall within the boundary of the SAC. In the southern part of the woods, closest to the Central Leaside AAP boundary, all units were considered to be in a Favourable condition (December 2013) apart from one unit in an unfavourable condition. In the northern part of the woods, all units are considered to be in a favourable condition (December 2013) apart from three units which are in an unfavourable condition.</p> <p>The potential threats to the site identified in the SSSI information include:</p> <p>Encroachment of sycamore;</p> <p>Small-scale fly-tipping;</p> <p>Appropriate management to maintain and diversify woodland structure;</p> <p>Deer browsing (management needed);</p> |
|                                 | <ul style="list-style-type: none"> <li>- The supporting processes on which qualifying natural habitats and habitats of qualifying species rely;</li> <li>- The populations of qualifying species;</li> <li>- The distribution of qualifying species within the site.</li> </ul>   | <p>Inappropriate use by off-road vehicles in small areas.</p>  |



## Appendix 5 - Screening Assessment of Likely Significant Effects on European Sites from Implementing the Central Leaside Area Action Plan Policies

| Central Leaside AAP Reference               | Overview of Policy and Comment in relation to the European Sites under Consideration   | Screening Category | Scope In/ out |
|---|--|--------------------|---------------|
| Policy CL1 - The Causeway                   | <p>The main spine route running east-west through Central Leaside. It will enable movement around Meridian Water and a space for community interaction, with a strong focus on sustainable transport.</p> <p>The localised nature of the effect on traffic means that it is highly unlikely to generate effects of significant impact to affect the European Sites.</p>  | G                  | Out           |
| Policy CL2 - Housing Density and Capacity   | <p>Sets out the approach to housing density and delivery within the Meridian Water neighbourhoods.</p> <p>Includes no specific development proposals.</p>  | F                  | Out           |
| Policy CL3 - Meridian Angel Neighbourhood   | <p>Establishes the policy approach for this neighbourhood, which focus on housing and education provision, and design principles common to all Central Leaside Neighbourhoods.</p> <p>Effects of the increased population likely to be localised and insufficient to affect the relatively distant European Sites. Local leisure attractions will attract most visitors and reduce the potential impact on more remote European Sites.</p> | G                  | Out           |
| Policy CL4 - The Gateway Neighbourhood      | <p>Establishes the policy approach for this neighbourhood, with a focus on transport and employment.</p> <p>Effects of the increased population likely to be localised and insufficient to affect the relatively distant European Sites. Local leisure attractions will attract most visitors and reduce the potential impact on more remote European Sites.</p>   | G                  | Out           |
| Policy CL5 - Meridian Central Neighbourhood | <p>Establishes the policy approach for this neighbourhood which focus on commercial, community and housing requirements.</p> <p>Effects of the increased population likely to be localised and insufficient to affect the relatively distant European Sites. Local leisure attractions will attract most visitors and reduce the potential impact on more remote European Sites.</p>   | G                  | Out           |
| Policy CL6 - The Islands Neighbourhood      | <p>Establishes the policy approach for this neighbourhood which focuses on education and housing requirements.</p> <p>Effects of the increased population likely to be localised and insufficient to affect the relatively distant European Sites. Local leisure attractions will attract most visitors and reduce the potential impact on more remote European Sites.</p>   | G                  | Out           |

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|  | impact on more remote European Sites.  |   |     |
| Policy CL7 - Canal-side West Neighbourhood           | <p>Establishes the policy approach for this neighbourhood which focuses on canal-side development, housing and the retail park.</p> <p>Whilst the effects of development likely to be localised, due to the nature of the neighbourhood adjoining the waterway, specific development proposals must be carefully considered in terms of any potential wider impact upon which could affect the European Sites.</p>   | G | Out |
| Policy CL8 - Meridian East Neighbourhood             | <p>Establishes the policy approach for this neighbourhood which focuses on canal-side development, commercial/ industrial land and housing.</p> <p>Whilst the effects of development likely to be localised, due to the nature of the neighbourhood adjoining the waterway, specific development proposals must be carefully considered in terms of any potential wider impact upon which could affect the European Sites.</p>   | G | Out |
| Policy CL9 - The Parklands                           | <p>Establishes the policy approach for this neighbourhood which focuses on the provision of recreation spaces and ecological enhancements.</p> <p>Whilst the effects of policy are likely to be localised, and any effect insufficient to affect the European Sites.</p>   | G | Out |
| Policy CL10 - Harbet Road Industrial Estate          | <p>Sets out the amendments to Strategic Industrial Land at the Harbet Road industrial estate and the classes of business use with Meridian Water must encourage. Requirements for pedestrian a cycle lines should help to neutralise any potential traffic generation from the increased intensity of use at the neighbourhood.</p>  | G | Out |
| Policy CL11 - Angel Road Station Improvements        | <p>Major upgrade to this station in terms of the user experience, access, and connectivity to the surrounding area. These changes are necessary so that the new proposed housing development does not generate an excessive increase in road traffic, and is therefore key to sustainable development of the area. The improvements are also likely to increase use of sustainable transport by existing residents of the area, and reduce private vehicle road traffic.</p> | G | Out |
| Policy CL12 - Enhancing the Bus Network and Services | <p>The policy supports an improved bus network to connect Central Leaside within the AAP area and with surrounding locations. Through encouraging better public transport the policy should allow more sustainable development to take place at Central Leaside. Whilst bus themselves are constitute an increase in road traffic, any negative effects are likely to be insufficient to affect the European Sites</p>   | G | Out |

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| Policy CL13 - Meridian Water Local Centre                                     | This policy supports the development of a local centre to provide local-need shopping for the new residents of Meridian Water. Provision of local shopping can reduce the distance the new residents need to travel to purchase essential everyday items, and therefore prevent air pollution from unnecessary journeys.   | G | Out |
| Policy CL14 - Linking Ravenside Retail Park to the Wider Central Leaside Area | Greater connectivity of the existing retail park to the new developments will promote non-vehicular journeys, helping to mitigate air pollution. Whilst the effects of this policy are likely to be environmentally beneficial, this significant distances means that there are unlikely to positively affect the European Sites   | G | Out |
| Policy CL15 - Community Facilities in Meridian Water                          | This policy covers educational facilities, healthcare facilities, and community spaces and places. There are unlikely to be affects from these policies which have significant environmental impacts, and any which do effects will be localised not affect the European Sites.  | G | Out |
| Policy CL16 - Managing Flood Risk in Meridian Water                           | This policy supports partnership work with the relevant organisations, including the Environment Agency, to secure an integrated and sustainable approach to the management of development and flood risk through complementary flood mitigation and water management measures.<br><br>The measures included within the policy should be sufficient to prevent negative impacts upon the European Site, in particular the Walthamstow Marshes SPA. | G | Out |
| Policy CL17 - Infrastructure Delivery in Meridian Water                       | Contributions from residential delivery and the infrastructure that is could fund. The policy includes no specific development proposals.  | F | Out |
| Policy CL18 - New Strategic Industrial Locations in Central Leaside           | The policy allocates areas of industrial land in Central Leaside for SIL classification. Since the change is one of classification and not use, there is no direct effect which could impact on the European Sites.  | G | Out |
| Policy CL19 - New Locally Significant Industrial Sites in Central Leaside     | The policy allocates areas of land in Meridian Water for LSIS classification. The location and size of these sites, combined with the uses which will be permitted on these sites as part of the Meridian Water development, is such that there will be no effect which could impact on the European Sites.  | G | Out |
| Policy CL20 - Improving Existing Industrial Areas                             | Support for improvements to the industrial estates of Central Leaside includes better traffic management and environmental improvements. The policy also supports the declassification of a part of the LSIS designation at the Montagu Estate to become a local open space. The measures supported by the policy could lead to a reduction in air pollution. Overall the policy will not have effects   | G | Out |

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|   | that will impact on European Sites.   |   |     |
| Policy CL21 - Angel Road Retail Park  | This policy changes the designation of the location from retail park to employment mixed uses to better support the adjoining Eleys Industrial Estate. There are no elements of the policy which would encourage or allow development that could impact on the European Sites.  | G | Out |
| Policy CL22 - Redevelopment of the EcoPark site                               | Large-scale waste management facilities, including an incinerator, will continue to be supported at this site, with redevelopment aiming to minimise emissions to air and water, minimise energy use, and support the Lee Valley Heat Network decentralised energy network.<br><br>This policy should provide reductions in air and water pollution, although the distance to the European Sites means that there is unlikely to be any beneficial impact.  | G | Out |
| Policy CL23 - Deephams Sewage Treatment Works (STW)                           | The policy supports the upgrade of the STW to meet the new discharge requirements set by the Environment Agency.<br><br>Through improving the quality of the discharge into the watercourse, this policy will have a beneficial effect downstream at the Lee Valley SPA.  | D | Out |
| Policy CL24 - Revitalising Developed Areas at Picketts Lock                   | The western part of the site will be intensified in its use to provide greater leisure facilities and a source of jobs. The policy requires that proposals must not exacerbate congestion on the wider area, which public transport improvements to the area should help to achieve. Furthermore, effects of the development are likely to be localised and insufficient to affect the European Sites   | G | Out |
| Policy CL25 - Revitalising Open Space at Picketts Lock                        | The eastern part of the site can encourage a greater range of suitable uses and visitors. Due to proximity to the waterway care must be taken, and the policy requires proposals to provide an integrated long-term landscape and ecological management plan and surface water management plan. Given these measures, the policy will not affect the downstream Lee Valley SPA.   | G | Out |
| Policy CL26 - Improving the Quality of the Pedestrian and Cycling Environment | This policy will encourage more journeys to be taken by foot and bicycle, so helping to improve air quality. Due to the distance to the European Sites, the policy is unlikely to have a positive effect upon them. Whilst better access could increase the number of visitors to the European Sites, the distances between Central Leaside and the sites mean that any increase in numbers will not be sufficient to have a negative impact. Furthermore, policy CL24 on Picketts Lock and CL9 the Parklands will provide more accessible leisure resources for use by the local population. | G | Out |



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| Policy CL27 - Proposed Route - Improvement Principles | This policy will encourage more journeys to be taken by foot and bicycle, so helping to improve air quality. Due to the distance to the European Sites, the policy is unlikely to have a positive effect upon them. While better access could increase the number of visitors to the European Sites, the distances between Central Leaside and the sites mean that any increase in numbers will not be sufficient to have a negative impact. Furthermore, policy CL24 on Picketts Lock and CL9 the Parklands will provide more accessible leisure resources for use by the local population. | G | Out |
| Policy CL28 - Use of the Waterways for Transportation | The policy supports the greater use of water-borne transport on the Lee Navigation. If transport reduces the number of trips by road vehicles then the policy could reduce air pollution. There is also potential for the uses to pollute the water and increase the number of visitors, however, the policy mitigates for this by requiring proposals to be considered through consultation with relevant statutory organisation. Given this measures, the policy will not affect the European Sites.   | G | Out |
| Policy CL29 - Design of the Road Network              | The road network will support the regeneration of Central Leaside. Increases in road traffic could lead to greater air pollution and support housing which raises the number of potential visitors in the area. The policy requires that development encourages sustainable travel, which will minimise the polluting effect of road traffic. Furthermore, the distance to the European Sites and the localised nature of the effects of this policy, mean that there will be no impact.   | G | Out |
| Policy CL30 - The Lee Valley Heat Network             | The policy supports the development of this decentralised energy network (DEN). Through more efficient supply of energy needs for new and existing residents and businesses in Central Leaside, this policy will reduce air pollution which would otherwise be generated by heating systems. The localised nature of a reduction, however, means that there is unlikely to be a positive impact on the European Site.  | G | Out |
| Policy CL31 - Celebrating the Lee Valley Waterways    | Making greater use of the waterways raises the possibility of water pollution and increased visitor numbers. The policy refers to DMD 75, which places criteria upon any proposals for moorings to prevent harm, including to the ecology of the river. Given this protection, there will be no impact upon the European Sites.  | G | Out |
| Policy CL32 - New and Existing Open Spaces            | The policy seeks the enhancement of existing open space and provision of new spaces, aiming to improve access and connectivity. The appropriate uses listed would not have an impact sufficient to affect the European Sites.  | G | Out |

