Assessment of the Core Strategy under the Habitats Regulations – Screening Report
London Borough of Tower Hamlets
August 2009
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Appendix A: Detailed Assessment of the Core Strategy
1 Introduction

1.1 BACKGROUND

1.1.1 Natura 2000 is the European Union-wide network of protected areas, recognised as ‘sites of Community importance’ under the EC Habitats Directive (Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora). These sites, which are also referred to as European sites, consist of Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Offshore Marine Site (OMS).

1.1.2 In addition to the above, sites designated under the Ramsar Convention (known as Ramsar sites) also receive the same degree of protection under Planning Policy Statement 9 (PPS9) (ODPM, 2005) as a matter of planning policy. SPAs and SACs are known as European sites and are part of the Natura 2000 network and all three types of site are also referred to as International sites.

1.1.3 The purpose of Appropriate Assessment (AA) of land use plans is to ensure that protection of the integrity of European sites is a part of the planning process at a regional and local level.

1.1.4 AA of plans and projects is required by Articles 6(3) and 6(4) of the European Habitats Directive:

“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 social or economic nature, the Member State shall take all compensatory measures necessary to ensure that the overall coherence of Natura 2000 is protected. It shall inform the Commission of the compensatory measures adopted.

Where the site concerned hosts a priority natural habitat type and/or a priority species the only considerations which may be raised are those relating to human health or public safety, to beneficial consequences of primary importance for the environment or, further to an opinion from the Commission, to other imperative reasons of overriding public interest”.
1.1.5 In the UK, the Habitats Directive is implemented through the Conservation (Natural Habitats &c) Regulations 1994 (the “Habitats Regulations”).

1.1.6 On 20 October 2005, the European Court of Justice (ECJ)\(^1\) ruled that the UK had failed to fully transpose the provisions of Article 6(3) and (4) into the Habitats Regulations because the regulations did not clearly require land use plans to be subject to AA. Land use plans in this respect are Regional Spatial Strategies (RSSs), Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs)\(^2\). DPD and SPD are collectively referred to as Local Development Documents (LDDs).

1.1.7 A major amendment to the Habitats Regulations was made in 2007 (Statutory Instrument 2007 No. 1843) in response to the judgment. The 2007 amendment to the Regulations now specifically apply the provisions of the Habitats Regulations to land use plans such as the Tower Hamlets Core Strategy, and the relevant provisions are made in the main by Regulations 85A to 85E. The essential requirement is for the plan making authority to assess the potential effects of the LDD on European Sites in Great Britain. The site affected could be in or outside England.

1.1.8 The whole process of assessing the effects of a LDD on European sites is referred to in this report as the ‘Habitats Regulations Assessment’ (HRA), to clearly distinguish the whole process from the step within it commonly referred to as the ‘Appropriate Assessment’ (AA). The AA is a specific part of the entire assessment process and to use this term generally just adds confusion to the assessment. An AA is undertaken when it has been determined that a plan or project (alone or in combination) is likely to have a significant effect, and where avoidance measures cannot easily be put in place to remove that likelihood. In such instances, the next step in the process is to undertake an Appropriate Assessment of the plan or project, to determine in far greater detail the type and magnitude of impacts and to try to find suitable mitigation measures that may reduce the impact to a level at which it will no longer be significant.

1.1.9 This report has been prepared by WSP Environmental Ltd on behalf of Tower Hamlets Borough Council to inform the preparation of their Core Strategy.

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\(^1\) Para. 51-56 in Case C-6/04, Commission of the European Communities v. United Kingdom of Great Britain and Northern Ireland, [http://curia.eu.int/jurisp/cgi-bin/form.pl?lang=en&Submit=Submit&alldocs=alldocs&docj=docj&docop=docop&docor=docor&docjo=docjo&numaff=C-6%2F04&datefs=&datefe=&nomusuel=&domaine=&mots=&resmax=100](http://curia.eu.int/jurisp/cgi-bin/form.pl?lang=en&Submit=Submit&alldocs=alldocs&docj=docj&docop=docop&docor=docor&docjo=docjo&numaff=C-6%2F04&datefs=&datefe=&nomusuel=&domaine=&mots=&resmax=100)

\(^2\) Letter from Lisette Simcock (ODPM) to chief planning officers (28 February 2006) “The Application of Appropriate Assessment under Article 6(3) and (4) of the Habitats Directive 92/43/EEC to Development Plans in the Transitional period between now and when the Amending Regulations come into force.”
1.2 HABITATS REGULATIONS ASSESSMENT AND THE CORE STRATEGY

1.2.1 The Core Strategy is a new plan which will provide a clear strategy for what will happen spatially throughout the Borough up to 2025.

1.2.2 The Core Strategy sets out the key elements of the planning framework for Tower Hamlets including the long term spatial vision. It comprises of the Big Spatial Vision; Borough wide spatial themes; spatial strategies for the places; a monitoring and implementation framework; and various appendices. The Core Strategy sets the overall planning framework as once adopted, all other development plan documents must be in conformity with it. The Core Strategy works with other strategies that have implications for the development and use of land, for example the Community Plan.

1.3 METHODOLOGY

1.3.1 In devising the methodology for this work regard has been had to relevant guidance and recent practice:

- Assessment of Plans and Projects Significantly Affecting Natura 2000 sites\(^3\) (European Union November 2001);
- Unpublished Draft Guidance from Natural England on AA of Regional Spatial Strategies and Local Development Frameworks\(^4\); and
- Guidance from the Department for Communities and Local Government (DCLG)\(^5\) on Appropriate Assessment of RSSs and LDDs.

1.3.2 A HRA has been undertaken of the London Plan. Regard has been had to that work.

1.3.3 HRA work has also been undertaken in relation to earlier versions of the Core Strategy and this report also draws on that work.\(^6\)

1.3.4 In accordance with relevant guidance, the following tasks have been undertaken at this stage:

1. Brief description of the plan that is being considered;
2. Characteristics of the sites that might be affected;
3. Identification of policies that can be screened out (using a checklist devised by Natural England. See diagram below). This included:

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A more detailed consideration of selected policies to highlight opportunities for avoidance measures to be incorporated in policies within the Core Strategy, lower level plans and projects. This comprised:

- Identification of potential effects and the ‘pathways’ that might give rise to these effects;
- An assessment of the significance of potential effects with respect to the features (either or both primary habitats and species) for which a European site has been designated;
- Consideration of opportunities for minor policy amendments to make it clear that the strategy does not provide support for any proposal which would have an adverse effect on the integrity of any European site;
- Consideration of opportunities for avoidance and mitigation measures in lower tier documents;
- The assessment of potential effects also took account of the likelihood of such effects occurring. This is consistent with the precautionary approach;
- Consideration of the potential for in-combination effects; and
- Recommendations for the development of the Core Strategy.

1.3.5 Diagram 1 at the end of this section summarises the overall methodology and in particular the iterative nature of the screening process.

1.4 STRUCTURE OF THIS REPORT

1.4.1 The remainder of this report is structured as follows:

- **Section 2** reviews the context at the regional level, in terms of the assessment of effects and relevant policies in the London Plan. It then outlines the scope and content of the Core Strategy and presents information on relevant European Sites;

- **Section 3** identifies policies that can be screened out of the process and those which require further consideration. It then considers potential effects associated with remaining policies in the Core Strategy, both in isolation and in-combination;

- Conclusions and recommendations follow in **Section 4**.
Diagram 1: Summary of the key tasks within the HRA Screening

1. Site analysis and screening for likely significant effects
   - Description of plan
   - Agree sites to be considered with Natural England and identify characteristics of sites.
   - If policy will not give rise to significant effects.
   - If potential significant effects on European sites identified - record in matrix and proceed to ‘Box 2 consideration of potential effects’.

2. Consideration of potential effects
   - Place policy in screening table against appropriate criterion.
   - If there is still doubt or potential significant effects still exist.
   - Examine policy in greater detail.
   - Identify measures to avoid significant effect occurring.

3. Appropriate assessment

4. Put forward alternatives and mitigation measures where significant effects are identified
   - If potential significant effects cannot be mitigated or compensated.

5. Apply the ‘imperative reasons of overriding public interest (IROPI)’ test.
   (This stage is included here to show the whole process. It is not a standard part of the process and should be carried out only in exceptional circumstances. An assessment to consider whether compensatory measures will or will not effectively offset the damage to a site will be necessary before the plan can proceed.)
2 Preliminary

2.1 INTRODUCTION

2.1.1 This section provides an overview of the key issues identified at the regional level through the HRA of the London Plan. A brief description of the main elements of the Core Strategy and key information for relevant European sites is then provided.

2.2 HRA AND THE LONDON PLAN

2.2.1 The London Plan was subject ed to a Screening Exercise in 2006/7. Key issues arising from that work were as follows:

- Housing development in the vicinity of Richmond Park, Wimbledon Common and Epping Forest which could increase recreational pressure on these open access sites. [N.B. Lea Valley SPA is excluded because the component sites in London (i.e. Walthamstow Reservoirs and Chingford Reservoirs) have controlled access.];
- New major transport infrastructure could impact upon European sites, either directly through land-take or indirectly through changes in air quality or hydrology;
- Water resources should be considered in addition to water supplies. Many European sites could be affected adversely by changes in groundwater levels or over abstraction; and
- Potential impacts on designated sites from development within opportunity areas.

2.2.2 The report recommended changes to relevant policies in the London Plan and noted the need for screening of Core Strategies.

2.3 KEY POLICIES IN THE LONDON PLAN

2.3.1 The London Plan contains a number of policies that are relevant to the assessment of potential effects on the Natura 2000 Network. Key policies are summarised below. These are important because issues like air quality and water supply need to be tackled on a London – wide basis.

2.3.2 Policy 2A.1 ‘Sustainability Criteria’ identifies the need to take account of the impact of development on natural resources and provide green infrastructure that takes account of the wider network. This policy is relevant to the issues identified in relation to recreational pressures.

2.3.3 Policy 3D.8: Realising the value of open space and green infrastructure is relevant to the issue of recreational pressure on European sites and avoiding it through the provision of alternative sites. The policy states:

“The Mayor will work with strategic partners to protect, promote and improve access to London’s network of open spaces, to realise the current and potential value of open space to communities, and to protect the many benefits of open space,”

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including those associated with health, sport and recreation, children’s play, regeneration, the economy, culture, biodiversity and the environment.

Policies in DPDs should treat the open space network as an integrated system that provides a “green infrastructure” containing many uses and performing a wide range of functions, such as the East London Green Grid. All developments will be expected to incorporate appropriate elements of open space that make a positive contribution to and are integrated with the wider network”.

2.3.4 Policy 4A.16: ‘Water supplies and resources’ is relevant to the issue of reducing demand for water and increasing efficient use of existing supplies. It states in part:

“The Mayor will work in partnership with appropriate agencies within London and adjoining local planning authorities to protect and conserve water supplies and water resources in order to secure London’s needs in a sustainable manner by supporting the Water Strategy and by:

• minimising the use of treated water
• reaching cost-effective minimum leakage levels
• maximising rainwater harvesting opportunities
• introducing targets for water recycling in major developments
• promoting the use of dual potable and grey water recycling systems
• in conjunction with demand side measures, promoting the provision of additional sustainable water resources in a timely and efficient manner, to reduce the water supply deficit and achieve a security of supply in London
• minimising the amount of energy consumed in water supply processes
• ensuring that adequate sustainable water resources are available for major new developments and for conservation and enhancement of the natural environment
• maintaining and upgrading the infrastructure.”

2.3.5 Policy 4A.19: ‘Improving air quality’ states:

“The Mayor will, and boroughs should, implement the Mayor’s Air Quality Strategy and achieve reductions in pollutant emissions and public exposure to pollution by:

• improving the integration of land use and transport policy and reducing the need to travel, especially by car (see Policy 3C.1)
• promoting sustainable design and construction (Policy 4A.3)
• promoting sustainable construction to reduce emissions from the demolition and construction of buildings (Policy 4A.22)
• ensuring at the planning application stage, that air quality is taken into account along with other material considerations, and that formal air quality assessments are undertaken where appropriate, particularly in designated Air Quality Management Areas

• seeking to reduce the environmental impacts of transport activities by supporting the increased provision of cleaner transport fuels, including hydrogen, particularly with respect to the refuelling infrastructure

• working in partnership with relevant organisations, taking appropriate steps to achieve an integrated approach to air quality management and to achieve emissions reductions through improved energy efficiency and energy use (Policy 4A.7).

The Mayor will work with strategic partners to ensure that the spatial, transport and design policies of this plan support his Air Quality Strategy.”

2.3.6 Policy 4B.1: ‘Design principles for a compact city’ includes the following criterion:

“Respect the natural environment and biodiversity, and enhance green networks and the Blue Ribbon Network”

2.3.7 Policy 4C.2 ‘Context for sustainable growth’ states:

“Development and use of the water and waterside land along the Blue Ribbon Network should respect resource considerations and natural forces in order to ensure that future development and uses are sustainable and safe.”

2.4 THE CORE STRATEGY

2.4.1 The main elements of the Core Strategy are outlined below, including the following matters:

■ Role of the Core Strategy;

■ The Spatial Strategy and Principal locations for growth; and

■ Key policies relating to the natural environment.

ROLE OF THE CORE STRATEGY

2.4.2 The Core Strategy is an overarching spatial document which will indicate areas and locations for new development, along with criteria to guide new development to the most appropriate locations. It needs to be consistent with the London Plan, applying policies that are consistent with it but at the same time avoiding duplication of policies.

2.4.3 The Core Strategy is part of the Local Development Framework for Tower Hamlets, which will guide and enable development, secure regeneration, reduce deprivation and help improve the environment and community facilities over the next 20 years. This document sets out a spatial vision and strategy and looks at the issues and options in the Borough as well as some preferred options to help achieve the spatial strategy. The Core Strategy will help deliver the Community Plan.
2.4.4 In addition to this HRA, the Core Strategy has, and will continue to be, informed by a Sustainability Appraisal, evidence from various planning studies, Government planning policy statements and the London Plan.

PRINCIPAL LOCATIONS FOR GROWTH

2.4.5 The Big Spatial Vision of the Core Strategy is to re-invent the hamlets. It is derived from the historic development of the hamlets and the wider borough and influences the implementation of the place shaping approach. Reinforcing and reinventing the historic hamlets will protect and enhance their unique character whilst creating places suitable for modern living. These will ultimately contribute to the vision of creating One Tower Hamlets.

KEY POLICIES RELATING TO THE NATURAL ENVIRONMENT

2.4.6 The Core Strategy already recognises the need to enhance the environment and also provides more detail on strategic open spaces and other initiatives referred to in the London Plan. The existence of these policies is important; they set the tone for the rest of the HRA and can be taken into account in the assessment of potential effects. Key policies include:

2.4.7 SO1 – Delivering Tower Hamlets Regional Role includes the following commitment:

“Fulfilling our environmental responsibilities to protect our natural environment, manage flood risk, and live within the environmental limits of the region.”

2.4.8 SO3 – ‘Achieving wider sustainability will be partly achieved through:

- "minimising the use of natural resources;
- Working to proactively protect and enhance the quality of the environment;
- Improving air, land and water quality by minimising air, noise, land and water pollution.

2.4.9 Policy SP6 is partly concerned with improving air quality in the Borough and includes the following proposals:

- Continuing to promote the use of public transport and reducing the reliance on private motor vehicles.
- Managing and improving air quality along transport corridors and traffic congestion points by working with Transport for London
- Implementing a Clear Zone in the borough to improve air quality.

2.4.10 This is clearly relevant to the consideration of issues around air quality and impacts on European sites.

2.4.11 SO12 relates to the Green and Blue Grid and sets out the following objective:
“To create a high-quality, sustainable and well connected natural environment of green and blue spaces that are rich in biodiversity and promotes active and healthy lifestyles.”

2.4.12 This objective is clearly relevant to the consideration of issues around potential pressure for recreation on European sites. It is supported by SP7, which includes the intention to create significant areas of open space, including the Lea River Park and Olympic Park. SP7 also identifies the opportunity to improve access to existing parks, including Victoria Park.

2.4.13 SO19 recognises the need to:

“Deliver an accessible, efficient, high quality, sustainable and integrated transport network to reach destinations within and outside of the borough.”

2.4.14 SP11 sets out policies that will help deliver an integrated transport network, including sub-regional interchanges.

2.4.15 All of the above have a role to play in helping to avoid potential effects on European sites. The next section considers the potential for effects on such sites and the need for any further modifications to policy.

2.5 IDENTIFYING SITES FOR ASSESSMENT

2.5.1 The European sites relevant to development within Tower Hamlets are:

- Epping Forest SAC, a woodland site which is one of the best examples of Atlantic acidophilus beech forest in its UK range, which also hosts the stag beetle; and
- Lea Valley SPA / Ramsar, a wetland site composed of a series of reservoirs and reedbed habitat that hosts internationally important communities of bittern, gadwall and shoveler.

2.5.2 These sites were identified through consultation with Natural England and were selected because they are within 10km of the Borough boundary.

2.5.3 The characteristics of the sites are summarised in Table 2.1 below.

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<td>Epping Forest SAC Approx 4.2km to the North of the Borough</td>
<td>The primary reasons for site designation are the presence of Annex I habitat Atlantic acidophilus beech forests and Annex II species stag beetle Lucanus cervus. Epping Forest represents one of the best examples of this habitat in the UK range. Although the epiphytes at this site have declined, largely as a result of air pollution, it remains important for a range of rare species, including the moss Zygodon forsteri. The long history of pollarding, and resultant large number of veteran trees,</td>
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ensures that the site is also rich in fungi and dead-wood invertebrates. Other features which this site supports are the habitats **North Atlantic wet heaths with *Erica tetralix*** and **European dry heaths**, as well as the great crested newt *Triturus cristatus*.

**Vulnerabilities:**
- Habitat destruction (recreation);
- Air pollution (epiphytes);
- Air pollution (acid soils);
- Change to management regime (pollarding);
- Climate change / drought (hydrological regime);
- Water abstraction / drainage (hydrological regime).

| Lea Valley SPA | The primary (Article 4.1) reason for designation is the presence of the (Bird’s Directive) Annex I species *bittern Botaurus stellaris*. The site is also designated under Article 4.2 for the presence of *gadwall Anas strepera* and *shoveler Anas clypeata*. The site is a network of former quarries, gravel pits and reservoirs connected by the Lea river system. Site management provided by the Lee Valley Regional Park Authority (among others) delivers ecological improvements and manages recreational pressures through zoning of water bodies throughout the Park. **Vulnerabilities:**
- Habitat destruction (recreation, adjacent development);
- Eutrophication (hydrological regime);
- Disturbance (recreation);
- Abstraction (hydrological regime);
- Climate change / drought (hydrological regime);
- Food availability. |
| Lea Valley Ramsar | The site has also been designated under the Ramsar Convention because it supports the **nationally vulnerable** whorled water-milfoil *Myriophyllum verticillatum* and a water boatman *Micronecta minutissima*, and **internationally important** populations of Northern shoveler and gadwall. The site consists of open water with associated wetland habitats including reedbeds, fen grassland and woodland supporting a number of wetland flora and fauna, including internationally important numbers of wintering wildfowl. **Vulnerabilities:**
- Habitat destruction (recreation, adjacent development);
- Eutrophication (hydrological regime);
- Disturbance (recreation);
- Abstraction (hydrological regime);
- Climate change / drought (hydrological regime);
- Food availability. |
3 Screening the Policies

3.1 INTRODUCTION

3.1.1 In line with the draft guidance from Natural England referred to earlier, the cross-cutting policies in the Core Strategy have been screened against a set of criteria in order to identify whether or not policies will have a potentially significant effect on a European site.

3.2 APPROACH

3.2.1 Policies that fall into one of the following categories have been screened out:

- Category A1: The policy will not itself lead to development e.g. because it relates to design or other qualitative criteria for development;
- Category A2: The policy is intended to protect the natural environment;
- Category A3: The policy is intended to conserve or enhance the natural, built or historic environment;
- Category A4: The policy would positively steer development away from European sites and associated sensitive areas;
- Category A5: The policy would have no effect because no development could occur through the policy itself, the development being implemented through later policies in the same plan, which are more specific and therefore more appropriate to assess for their effects on European Sites and associated sensitive areas.

3.2.2 Policies that could not initially be screened out are considered further. The Natural England guidance identifies the following categories in which such policies can be placed:

- Category B – no significant effect;
- Category C – likely significant effect alone; and
- Category D – Likely significant effects in combination.

3.2.3 Table One (in Appendix A) presents the results of the screening exercise for the Core Strategy. The first column identifies the relevant policy and the second column identifies the categories that arose from the initial screening exercise. The third column presents the categories that arose from the re-consideration of elements of the Core Strategy that could not initially be screened out.

3.2.4 It is acknowledged that this exercise is subject to value judgements associated with all environmental assessments and although guided by criteria is still highly subjective.

3.3 RESULTS OF THE ASSESSMENT

3.3.1 The assessment suggests that the majority of the elements of the Core Strategy need not be looked at in more detail. Those that do need looking at in more detail relate specifically to development, which could give rise to issues around recreational pressure, impacts on air quality
and issues around water abstraction, and water quality. These issues are considered separately in more detail below. The aim being to look at the issues in more detail and, if possible:

- Provide a rationale for screening them out; or
- Identify amendments that will enable the issue to be screened out.

3.3.2 The effects identified in the previous screening exercise for the Core Strategy centred on air pollution and recreational pressure at Epping Forest, and water consumption, water quality and recreational pressure at Lea Valley. Each of these issues as they relate to each site is considered below.

3.4 IS RECREATIONAL PRESSURE FROM TOWER HAMLETS AN ISSUE IN THE LEA VALLEY?

3.4.1 It is worth noting that the HRA for the London Plan did not consider the potential for recreational pressure on the Lea Valley because component sites in London (i.e. Walthamstow Reservoirs and Chingford Reservoirs) have controlled access (Table 1 of Appendix C of the SA of the London Plan 2006 refers).

3.4.2 The earlier work undertaken on the HRA for the Core Strategy did however consider the potential for recreational effects on the Lea Valley and noted that:

- Car ownership within Tower Hamlets is very low, where 55.77% of households do not have access to a car;
- The percentage of total Park users originating from Tower Hamlets is believed to be also low, averaging approximately 3%; and
- The attractions generating the highest numbers of visitors are generally well separated from the most sensitive areas within the Park.

3.4.3 From the above it is apparent that Tower Hamlets is not a major source of visitors to the Lea Valley. It is also a managed site with areas of zoned-use management and controlled access.

For the reasons set out above it is concluded that the emerging Core Strategy will not have a significant effect on the Lea Valley SPA/Ramsar associated with recreational pressure

3.4.4 Not withstanding the conclusions set out above, there is potential for new development to contribute towards the enhancement of supporting habitats along the River Lea suitable to support those species for which the SPA is designated (internationally important communities of gadwall and shoveler).

3.4.5 As noted earlier, the Core Strategy also contains proposals for the provision of major recreational facilities, such as the Olympic Legacy Park and Lea River Park. These will help meet recreational needs. The Lea River Park could also facilitate the enhancement of surrounding habitats for the protected bird species concerned.
3.5 IS RECREATIONAL PRESSURE FROM TOWER HAMLETS AN ISSUE IN EPPING FOREST?

3.5.1 The Epping Forest Management Plan (2004-2010) acknowledges the unique role that the Forest plays in London:

“Epping Forest is a unique open space which is vital to the local community as a place to relax, take exercise and learn about wildlife and the natural environment. It is also a site nationally and internationally renowned for the very special diversity of habitats which exist here, particularly supported by the wonderful pollards and veteran trees. The special status of the Forest has been recognised and appropriately classified as a Site of Special Scientific Interest and a Special Area of Conservation. The historical importance of the buildings, monuments and sites throughout the Forest have also been acknowledged by being granted Grade II* Listed Buildings and Scheduled Monument status.”

3.5.2 Analysis of visitor survey collected by the City of London for the Forest suggests that it is an important local resource, travelled to mainly by foot by people who use it frequently, often as a means of making contact with wild and/or open areas. Only 13% of respondents visited to enjoy activities with family or friends. It is not known what proportion of visitors come from Tower Hamlets but it seems unlikely to be a great draw to residents of Tower Hamlets because of the distance to the site and relatively low levels of car ownership in the Borough.

3.5.3 As noted above the Core Strategy also contains proposals for the provision of major recreational facilities, such as the Olympic Legacy Park and Lea River Park.

For the reasons set out above it is concluded that the emerging Core Strategy will not have a significant effect on the Epping Forest SAC associated with recreational pressure

3.6 IS WATER ABSTRACTION AN ISSUE IN THE LEA VALLEY?

3.6.1 The four SSSIs that make up the Lea Valley SPA/Ramsar are dependent on the reservoirs and wetlands within them, and as a result could theoretically be negatively affected by a reduction in water levels caused by an increased number of abstractions.

3.6.2 The River Lea and its associated water bodies are currently over-abstracted, a state which is defined as where ‘existing abstraction is causing unacceptable environmental impact at low flows [but] water may still be available at high flows with appropriate restrictions.’

3.6.3 In addition, informal discussions with the Environment Agency (reported in the previous Technical Note) regarding its Review of Consents procedures (required under regulation 50 of the Habitats Regulations) suggest that current levels of abstraction have been declared as not having significant adverse effects on the designated
features of the Lea Valley SPA / Ramsar. It seems that the New Gauge abstraction in Ware, Hertfordshire is the principal concern and, if exploited to the limit of its abstraction licence would result in severely limited flow levels in the Lea. Current voluntary measures adopted by Thames Water avoid this outcome by abstracting only part of the licensed volume. However, due to the raised and embanked nature of the SPA / Ramsar reservoirs and additional supply of waters to the gravel pits associated with groundwater and the River Ash, the SPA / Ramsar is expected to remain unaffected even during conditions where the full amount is abstracted.

3.6.4 The London CAMS also comes to the following conclusions:

‘Demand for water resources is expected to increase in the London CAMS area due to new housing developments. The London Housing Capacity Study (LHCS) identifies scope to build 31,500 new homes every year between 2007 and 2017 [since revised by the Alterations to the London Plan to 30,500]. This will place pressure on the existing public water supply abstractions. As well as employing demand management measures, including increased water efficiency of new build households, demand may need to be met from outside the catchment. Recently we modelled the effect of this new housing growth on water supplied in London. We found that increased demand for water can be met with carefully planned resource developments and by improving people’s water use efficiency. All new abstraction licence applications are considered in relation to reasonable need and water efficiency is emphasised at every stage.’

3.6.5 The London Borough of Tower Hamlets is supplied by Thames Water. Most of Tower Hamlets receives its water from the Finsbury Park water supply zone which, along with the Woodford and Maiden lane, receives most of its supply from the Coppermills Advanced Water Treatment Works (AWTW) just south of Walthamstow Reservoirs. Indeed the reservoirs make up a significant part of this treatment infrastructure as they combine with sources from the Thames (via the Thames Lea Tunnel) and Lea Valley wells to generate an average supply of 500 megalitres per day. The proportions taken from each source vary throughout the year and from year to year, depending on river flows, storage conditions, aquifer levels and rainfall. According to Thames Water, capacity at Coppermills is fully utilised and has been for some considerable time without adverse effects on the nature conservation interest; this would concur with the Environment Agency’s findings above.

3.6.6 Provision for additional homes and businesses within Tower Hamlets should therefore be viewed in the context of development and growth across London as a whole, particularly given the high interconnectivity between water supply zones and the ability to transfer large volumes of water from one zone to another.

3.6.7 This will be further enhanced by development of the Thames Water Ring Main extensions, with one new pipe linking Coppermills AWTW to the Ring Main by connecting existing mains at Stoke Newington and Thames Water’s New River Head site in Islington, and a
second tunnel feeding water from the Ring Main to an existing underground reservoir called Honor Oak, in Peckham. Across London, Thames Water intends to employ a ‘‘twin track approach’’ to water supply/demand, involving an economic mix of new resource development schemes, demand management measures, major new resource schemes, a targeted programme of mains replacement and other leakage reduction measures.

The above analysis suggests that development associated with the Core Strategy will not have an adverse effect on the Lea Valley from water abstraction. However it is apparent that London as a whole is an area of water stress. SO3 of the Core Strategy recognises the need to minimise the use of natural resources however it is suggested that this makes explicit reference to the need to reduce demand for and consumption of water.

It is suggested that the Development Management DPD includes specific requirements to reduce the demand for and use of water in accordance with the London CAMS.

3.7 IS WATER QUALITY AN ISSUE IN THE LEA VALLEY?

3.7.1 The London Borough of Tower Hamlets borders the last stretch of the River Lea (around 7kms) before it enters the Thames. The lower section of the Lea is tidal and it is therefore possible for contaminants released in the Borough to travel upstream. However, the river is only tidal as far as the weir at Lea Bridge Road – north of this the river is freshwater. The southernmost component SSSI of the Lea Valley SPA / Ramsar is some 1.5km north of Lea Bridge Road, and as a result it can be assumed that any pollution of the Lea by industrial, commercial, residential or other land uses in Tower Hamlets will not affect the SSISs or the protected bird species. Furthermore, the raised nature of many of the reservoirs acts as an additional separating factor from the local hydrology and they are instead fed by waters from the Rivers Lea and Ash further upstream.

3.7.2 SPO7 of the emerging Tower Hamlets Core Strategy recognises the need to improve water quality.

3.7.3 There is potential for development associated with the Core Strategy to enhance the wider environment by ensuring that new development helps to avoid/minimise diffuse pollution entering the River Lea and that opportunities are taken to provide habitats that accord with the Local Biodiversity Action Plan. The Core Strategy already identifies relevant opportunities, e.g. in the ‘Delivering Placemaking’. There will be opportunity for more detailed consideration of issues at the project level.

Based on the above it is concluded that the Core Strategy will not impact on water quality in the Lea Valley SPA/Ramsar.
3.8 IS AIR QUALITY AN ISSUE FOR THE LEA VALLEY AND/OR EPPING FOREST?

3.8.1 There are two relevant sources of pollution, industrial processes and traffic. These are considered in turn below. Air quality is a London wide problem and the Mayor’s Air Quality Strategy is briefly discussed first.

3.8.2 The Mayor’s Air Quality Strategy outlines the main sources of pollution within London and the measures which can be taken to improve air quality. The strategy highlights that road traffic is the main source of pollution within the city (particularly for NO2 and PM10), although a significant contribution also comes from a mixture of industrial sources, construction sites, air travel, rail, ships, residential and commercial gas etc. Paragraphs 3.39 to 3.42 briefly discuss the links between air quality and biodiversity and highlights that the main pollutant of concern in London is nitrogen deposition. Road traffic is a significant source of this pollutant but it is also the factor with the most scope for improvement; many of the measures detailed in the Mayor's air quality strategy are therefore transport related.

3.8.3 Protected habitats are not discussed in great detail but paragraph 3.44 reiterates the statutory requirement for regulators to take into account the impact of developments requiring permission on these protected sites and the ability for authorities to subsequently modify or revoke permits for sites likely to have a significant adverse effect on protected sites.

INDUSTRIAL PROCESSES

3.8.4 For industrial processes, the current guidance that is used when assessing point source emissions is the IPPC H1 Guidance for the Environmental Assessment and Appraisal of BAT (available to download from http://www.environment-agency.gov.uk/business/topics/pollution/37231.aspx). Not all industrial processes/emissions will require assessment. A simple screening tool is provided with the guidance to determine which pollutants emitted from a process are released in significant amounts and which are not. For those pollutants which are emitted in significant amounts, detailed modelling may be required if the process is located near to sensitive receptors/locations of relevant exposure. The H1 document indicates that designated sites (including European sites) which are located within 10 km of the pollutant source should be considered as a sensitive receptor within an assessment. For major emitters (large power stations, refineries, or iron and steelworks) this distance increases to 15km.

3.8.5 With regards to development associated with the Core Strategy for Tower Hamlets, there is the potential that further assessment will be required for new industrial processes located within 10km (or 15km for major scale emitters) of the Lea Valley or Epping Forest sites. This may take the form of the simple screening exercise or more detailed modelling. It is assumed that each of the proposed industrial processes will need to carry out an appropriate air quality assessment in order to obtain their operating permit from the local authority or Environment
Agency. It is also assumed that each process will implement appropriate mitigation measures to minimise their impact on European sites.

Based on the above it is recommended that potential effects associated with air quality from industrial processes are best considered at the project level.

The Development Management DPD could highlight the need for such assessments to consider the potential for effects on European sites and the scope for avoiding or mitigating these.

**TRAFFIC RELATED EMISSIONS**

3.8.6 With regards to road traffic emissions, as detailed in the Design Manual for Roads and Bridges (DMRB), Volume 11, Section 3, Part 1 (May 2007) the effect of road traffic emissions on local air quality quickly reduces as the distance from the road increases. The DMRB states in paragraph 3.13 that “Only properties and Designated Sites within 200m of roads affected by the project need be considered”. Beyond 200m, the contribution of traffic emissions to local pollutant concentrations is considered to be negligible (although this is not to say that local pollutant concentrations will not still exceed the statutory air quality objective levels). This is further illustrated by Graph C1 in Annex C which is shown below, which shows the contribution to atmospheric pollutant concentrations of a stream of traffic compared to the distance from the centre of a road. Natural England also recognises that emissions are not likely to be significant beyond 200m.

![Graph C1](image)

Figure C1: Traffic Contribution to Pollutant Concentration at Different Distances from the Road Centre

3.8.7 There are two main roads which run from Tower Hamlets north towards the Lea Valley and Epping Forest sites, the A10 and the A12/A406. There is therefore potential for development within Tower Hamlets to contribute to the traffic levels on these roads. The Lea Valley site is not within 200 metres of the A10. The southern tip of the Epping Forest site lies approximately 157 metres from the A12/A406; however, taking the above DMRB guidance into account the impact of the road at this distance is likely to be minimal.
3.8.8 There are a number of objectives within the Core Strategy that aim to promote a sustainable transport network within the Borough and to reduce the impact of new development. These include, for example: ensuring that growth is supported by all types of infrastructure, particular regional transport projects such as CTRL and Crossrail to help Tower Hamlets to develop as a liveable, sustainable and healthy area of inner London; delivering an accessible, efficient, high quality, sustainable and integrated transport network to reach destinations within and outside of the borough; delivering a safe, attractive, accessible and well designed network of streets and spaces that makes it easy and enjoyable for people to move around on foot and bicycle. All of these objectives will help to reduce the level of road traffic generated by developments within the Borough of Tower Hamlets.

Based on the above it is concluded that emissions associated with traffic are unlikely to impact on a European site.

The Development Management DPD could highlight the need for screening for Appropriate Assessment of projects to consider the potential for effects on European sites associated with traffic.

3.9 IMPLICATIONS FOR THE CORE STRATEGY

3.9.1 Table 3.1 highlighted aspects of the Core Strategy that could potentially give rise to significant effects on European sites. Relevant issues have been discussed in Sections 3.4 to 3.8. The conclusion from this analysis is that the Core Strategy will not give rise to significant effects on European sites. Relevant aspects of the Core Strategy can therefore be reclassified as falling under Category B ‘no significant effect.’

3.9.2 Given that the Core Strategy is not anticipated to have a significant effect on European sites it is also not anticipated to have any in-combination effects. The need for vigilance in relation to London wide issues of water abstraction and air quality has already been highlighted.
4 Conclusions

4.1.1 A process has been followed which follows advice provided by Natural England. This process has been termed an ‘assessment under the Habitats Regulations’ (or a ‘Habitats Regulations Assessment’).

4.1.2 The process has examined each policy within the Core Strategy in turn to identify whether there is a potential for it to give rise to significant effects on European sites. For this part of the process a screening table has been used based on guidance produced by Natural England. Where there was uncertainty as to whether or not policies did not initially meet the criteria within this table, they have been examined in more detail.

4.1.3 An important element of completing the matrices has been the consideration of the risk of potential effects occurring, in accordance with the EC’s position statement on the Precautionary Principle\(^8\). This process has identified additional changes to the Core Strategy associated with water consumption and air quality.

4.1.4 This process has also highlighted that the position of the Core Strategy within the tiers of documents which make up the LDF, as well as with other plans, programmes and projects is important when assessing the level of risk of significant effects occurring. The need for additional assessments of plans as they progress reduces the risk of significant effects occurring.

4.1.5 The key point is 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 permission 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.

4.1.6 In addition, the potential for in-combination effects has been assessed and as part of this process the results of the AA work undertaken done for the London Plan have been taken into consideration.

4.1.7 In this particular instance, a range of potential effects have been considered and discounted for the reasons set out in Section 3 of this report. These comprise potential effects associated with recreational pressure, the abstraction of water, water quality and air pollution. These reflect the issues identified in the London Plan HRA Screening Report, which apply to a broader geographical area.

\(^8\) Communication from the Commission on the Precautionary Principle (2000), Commission of the European Communities
On the basis of the work undertaken it is concluded that an Appropriate Assessment of the Core Strategy is not required. This report will be consulted on with Natural England and should be updated in light of their comments and updated if the Core Strategy develops further.

4.1.8 The following recommendations are made. The above conclusion is not contingent on these recommendations being taken forward but they could further enhance the LDF’s contribution:

- The Development Management DPD could recognise the need to reduce the demand for and use of water in accordance with the London CAMS. Objective SO3 of the Core Strategy could be amended to explicitly refer to the need to reduce the demand for and consumption of water.

- The Development Management DPD could highlight the need for project level air quality assessments to consider the potential for effects on European sites and the scope for avoiding or mitigating these.
Appendix A  Detailed Assessment of the Core Strategy

Key to Table One
- Category A1: The policy will not itself lead to development e.g. because it relates to design or other qualitative criteria for development;
- Category A2: The policy is intended to protect the natural environment;
- Category A3: The policy is intended to conserve or enhance the natural, built or historic environment;
- Category A4: The policy would positively steer development away from European sites and associated sensitive areas;
- Category A5: The policy would have no effect because no development could occur through the policy itself, the development being implemented through later policies in the same plan, which are more specific and therefore more appropriate to assess for their effects on European Sites and associated sensitive areas.
- Category B – no significant effect;
- Category C – likely significant effect alone; and
- Category D – Likely significant effects in combination.

Note that categories C and D are not used in this instance.

Table One:  Detailed Assessment of the Core Strategy

<table>
<thead>
<tr>
<th>Element screened</th>
<th>Categorisation in the Initial Screening</th>
<th>Categorisation following detailed consideration of issues (see Section 3 of this report)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reinventing the Hamlets</td>
<td>This is the overall vision for the Core Strategy. This is judged to fall under Category A5.</td>
<td>A5</td>
</tr>
<tr>
<td>Delivering Tower Hamlets regional role - SO1</td>
<td>Places Tower Hamlets in its regional role and acknowledges the need for growth to occur in ways that respect the environment. This is judged to fall under Category A5.</td>
<td>A5</td>
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<tr>
<td>Element screened</td>
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<tr>
<td>Maximising the benefits of the Olympic legacy - SO2</td>
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<tr>
<td>Includes the commitment to delivering the Lea River Park and improvements to</td>
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<tr>
<td>Victoria Park, which could help alleviate any recreational pressure on</td>
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<tr>
<td>European sites. This is judged to fall under Categories A3 and A5.</td>
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<tr>
<td>Categorisation in the Initial Screening</td>
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<tr>
<td>A3 and A5</td>
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<tr>
<td>Achieving wider sustainability, health and well-being and tackling climate</td>
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<td>change – SO3</td>
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<td>Includes reference to the need to provide infrastructure (taken to include</td>
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<tr>
<td>green infrastructure). This is judged to fall under Categories A3 and A5.</td>
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<tr>
<td>Categorisation following detailed consideration of issues (see Section 3 of</td>
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<td>this report)</td>
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<tr>
<td>A3 and A5</td>
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<tr>
<td>SO4 - To have a hierarchy of interconnected, vibrant and inclusive town</td>
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<td>centres that are mixed use hubs for retail, commercial, leisure, civic and</td>
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<td>residential. The purpose of each town centre will differ according to its</td>
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<td>role and function.</td>
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<tr>
<td>This is judged to fall under Categories A4 and A5.</td>
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<tr>
<td>A4 and A5</td>
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<tr>
<td>SO5 - To promote mixed use at the edge of town centres and along main streets.</td>
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<tr>
<td>This is judged to fall under Categories A4 and A5.</td>
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<tr>
<td>A4 and A5</td>
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<tr>
<td>SO6 - To promote areas outside of town centres and edge of town centres for</td>
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<td>primarily residential and supporting uses that do not need the higher levels</td>
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<td>of accessibility that town centres require.</td>
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<tr>
<td>This is judged to fall under Categories A4 and A5.</td>
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<tr>
<td>A4 and A5</td>
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<tr>
<td>SP4 – how we are going to get there</td>
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<tr>
<td>This is judged to fall under Categories A4 and A5.</td>
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<tr>
<td>A4 and A5</td>
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<tr>
<td>SO7 - Deliver housing growth to meet general and specialised housing demand</td>
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<tr>
<td>in line with London Plan housing targets. Screened in for further consideration.</td>
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<tr>
<td>Housing growth could lead to increased need for water abstraction and</td>
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<tr>
<td>recreation pressures.</td>
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<tr>
<td>Category B – see section 3 for detailed consideration of these issues</td>
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<tr>
<td>SO8 - Ensure housing contributes to the creation of socially balanced and</td>
<td></td>
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<tr>
<td>inclusive</td>
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<tr>
<td>This is judged to fall under Category A1: The policy will not itself lead to</td>
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<tr>
<td>development e.g. because it relates to</td>
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<td>Element screened</td>
<td>Categorisation in the Initial Screening</td>
<td>Categorisation following detailed consideration of issues (see Section 3 of this report)</td>
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<tr>
<td>communities by offering housing choice reflecting the Council’s priorities for affordable and family homes.</td>
<td>qualitative criteria for development.</td>
<td></td>
</tr>
<tr>
<td>SO9 - Ensure that all housing in Tower Hamlets is high quality, well designed, energy efficient, sustainable and durable.</td>
<td>This is judged to fall under Category A1: The policy will not itself lead to development e.g. because it relates to qualitative criteria for development.</td>
<td></td>
</tr>
<tr>
<td>SP5 – how we are going to get there</td>
<td>Screened in for further consideration. Housing growth could lead to increased need for water abstraction and recreation pressures.</td>
<td>Category B – see section 3 for detailed consideration of these issues</td>
</tr>
<tr>
<td>SO10 - To deliver healthy and liveable neighbourhoods that promote active and healthy lifestyles and enhance peoples wider health and well-being.</td>
<td>This is judged to fall under Category A1: The policy will not itself lead to development e.g. because it relates to qualitative criteria for development.</td>
<td></td>
</tr>
<tr>
<td>SO11 - To ensure the timely provision of social infrastructure to support housing and employment growth.</td>
<td>This is judged to fall under Categories A2 and A5.</td>
<td></td>
</tr>
<tr>
<td>SP6 – how we are going to get there</td>
<td>This is judged to fall under Categories A2 and A5.</td>
<td></td>
</tr>
<tr>
<td>SO12 - To create a high-quality, well-connected and sustainable natural environment of green and blue spaces that are rich in biodiversity and promote active and healthy lifestyles.</td>
<td>This is judged to fall under Categories A3 and A5: The policy is intended to conserve or enhance the natural, built or historic environment.</td>
<td></td>
</tr>
<tr>
<td>SO13 - To reduce the risk and impact of flooding on people, property and the environment.</td>
<td>This is judged to fall under Categories A3 and A5.</td>
<td></td>
</tr>
<tr>
<td>Element screened</td>
<td>Categorisation in the Initial Screening</td>
<td>Categorisation following detailed consideration of issues (see Section 3 of this report)</td>
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<tr>
<td>SP7 – how we are going to get there</td>
<td>This is judged to fall under Categories A3 and A5. This is a key policy in relation to provision of green infrastructure.</td>
<td></td>
</tr>
<tr>
<td>SO14 - To plan for and manage the borough’s waste efficiently, safely and sustainably, by minimising the amount of waste produced, maximising recycling, and managing non-recyclable waste using treatment methods other than landfill.</td>
<td>Screened in for further consideration – new waste facilities could impact on air quality.</td>
<td>Category B – see section 3 for detailed consideration of these issues. Potential effects will need to be considered at the project level.</td>
</tr>
<tr>
<td>SP8 – how we are going to get there</td>
<td>Screened in for further consideration – new waste facilities could impact on air quality.</td>
<td>Category B – see comments above.</td>
</tr>
<tr>
<td>SO15 - To support the thriving and accessible global economic centres of Canary Wharf and the City Fringe that benefit the regional and local economies.</td>
<td>Screened in for further consideration – new employment facilities could lead to increased need for water abstraction and also potentially contribute to air pollution associated with travel to work from outside of Tower Hamlets.</td>
<td>Category B – see section 3 for detailed consideration of these issues.</td>
</tr>
<tr>
<td>SO16 - To support the growth of existing and future businesses in accessible and appropriate locations.</td>
<td>Screened in for further consideration – see comments under SO12.</td>
<td>Category B – see section 3 for detailed consideration of these issues.</td>
</tr>
<tr>
<td>SP9 – how we are going to get there</td>
<td>Screened in for further consideration – see comments under SO12.</td>
<td>Category B – see section 3 for detailed consideration of these issues.</td>
</tr>
<tr>
<td>SO17 - To improve education, skills and training in the borough and encourage and facilitate life-long learning.</td>
<td>Category A1: The policy will not itself lead to development e.g. because it relates to design or other qualitative criteria for development.</td>
<td>A1</td>
</tr>
<tr>
<td>SO18 - To promote the growth and</td>
<td>Category A1: The policy will not itself lead to development.</td>
<td>A1</td>
</tr>
<tr>
<td>Element screened</td>
<td>Categorisation in the Initial Screening</td>
<td>Categorisation following detailed consideration of issues (see Section 3 of this report)</td>
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<tr>
<td>expansion of further and higher education establishments as drivers of improved skills and a key part of the wider knowledge economy.</td>
<td>e.g. because it relates to design or other qualitative criteria for development.</td>
<td></td>
</tr>
<tr>
<td>SP10 – how we are going to get there</td>
<td>Screened in for further consideration. New education facilities could lead to issues associated with air pollution arising from trips to and from such facilities.</td>
<td>Category B – see section 3 for detailed consideration of these issues</td>
</tr>
<tr>
<td>SO19 - Deliver an accessible, efficient, high quality, sustainable and integrated transport network to reach destinations within and outside of the borough.</td>
<td>Screened in for further consideration. New transport facilities could lead to issues associated with air pollution.</td>
<td>Category B – see section 3 for detailed consideration of these issues</td>
</tr>
<tr>
<td>SP11 – how we are going to get there</td>
<td>Screened in for further consideration. New transport facilities could lead to issues associated with air pollution.</td>
<td>Category B – see section 3 for detailed consideration of these issues. Potential effects will need to be considered at the project level.</td>
</tr>
<tr>
<td>SO20 - Deliver a safe, attractive, accessible and well designed network of streets and spaces that makes it easy and enjoyable for people to move around on foot and bicycle.</td>
<td>Category A3: The policy is intended to conserve or enhance the natural, built or historic environment.</td>
<td>A3</td>
</tr>
<tr>
<td>SO21 - Create streets, spaces and places which promote social interaction and inclusion and where people value, enjoy and feel safe and comfortable in.</td>
<td>Category A3: The policy is intended to conserve or enhance the natural, built or historic environment.</td>
<td>A3</td>
</tr>
<tr>
<td>SP12 – how we are going to get there</td>
<td>Category A3: The policy is intended to conserve or enhance the natural, built or historic environment.</td>
<td>A3</td>
</tr>
<tr>
<td>Element screened</td>
<td>Categorisation in the Initial Screening</td>
<td>Categorisation following detailed consideration of issues (see Section 3 of this report)</td>
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<tr>
<td>SO22 - Protect, celebrate and improve access to our historical and heritage assets by placing these at the heart of reinventing the hamlets to enhance local distinctiveness, character and townscape.</td>
<td>Category A3: The policy is intended to conserve or enhance the natural, built or historic environment.</td>
<td>A3</td>
</tr>
<tr>
<td>SO23 - Promote a borough of well designed, high quality, sustainable and robust buildings that enrich the local environment and contribute to quality of life.</td>
<td>Category A3: The policy is intended to conserve or enhance the natural, built or historic environment.</td>
<td>A3</td>
</tr>
<tr>
<td>SP13 – how we are going to get there</td>
<td>Category A3: The policy is intended to conserve or enhance the natural, built or historic environment.</td>
<td></td>
</tr>
<tr>
<td>SO24 - Achieve a zero carbon borough in the 21st century, with a 60% reduction in carbon emissions by 2025.</td>
<td>Screened in for further consideration – the facilities required to help achieve this target could have other emissions that impact on air quality.</td>
<td>Category B – see section 3 for detailed consideration of these issues. Potential effects will need to be considered at the project level.</td>
</tr>
<tr>
<td>SP14 – how we are going to get there</td>
<td>Screened in – see comments above.</td>
<td>Category B – see comments above.</td>
</tr>
<tr>
<td>SO25 - Deliver successful placemaking in Tower Hamlets in order to create locally distinctive, well designed, healthy and great places which interconnect, respond and integrate into the wider London area.</td>
<td>Category A3: The policy is intended to conserve or enhance the natural, built or historic environment.</td>
<td>A3</td>
</tr>
<tr>
<td>SP15 - how we are going to get there</td>
<td>This is judged to fall under Categories A3 and A5. The policy is intended to ensure that any development that takes place does so in accordance with sustainable principles</td>
<td>A3 and A5</td>
</tr>
<tr>
<td>Element screened</td>
<td>Categorisation in the Initial Screening</td>
<td>Categorisation following detailed consideration of issues (see Section 3 of this report)</td>
</tr>
<tr>
<td>--------------------------------</td>
<td>----------------------------------------------------------------------------------------------------------</td>
<td>--------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Individual statements on places</td>
<td>All taken forward for further consideration – these provide the spatial expression of other policies relating to development.</td>
<td>Category B – see section 3 for detailed consideration of these issues.</td>
</tr>
</tbody>
</table>