

**DRAFT CAMDEN
SITE ALLOCATIONS
LOCAL PLAN 2020**

**HABITATS REGULATIONS ASSESSMENT (HRA) –
SCREENING OPINION**

February 2020

Strategic Planning and Implementation
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Draft Camden Site Allocations Local Plan 2020 Habitats Regulations Assessment (HRA)

Screening Assessment: Potential impact of Site Allocations policies on sites protected in the Conservation Natural Habitats and Species Regulations 2010

1. Background

- 1.1 The Conservation Natural Habitats and Species Regulations 2010 implement the European Council Directive 92/42/EEC on the Conservation of Natural Habitats and Wild Fauna and Flora – known as the ‘Habitats Directive’. The Habitats Directive and associated regulations (the Conservation of Habitats and Species Regulations 2017) provide legal protection for habitats and species of European importance.
- 1.2 This report is the Council’s Habitats Regulations Screening Assessment of the Draft Site Allocations Plan (SALP). The Plan is to be published for consultation from 13 February to 27 March 2020.
- 1.3 The SALP identifies a range of suitable locations for housing, employment and other uses and sets out the Council’s approach to their redevelopment. Since the existing Site Allocations Plan was adopted by the Council in 2013, there have been a number of changes to the planning context, including publication of a new National Planning Policy Framework (NPPF), an emerging new London Plan and the adoption of the Camden Local Plan 2017.
- 1.4 The Camden Local Plan (adopted 2017) sets out the strategy for how the Borough as a place should grow and develop over the plan period (2016-2031) and provides a range of general policies to help ensure that growth takes place in the right locations and in the right way. It has therefore broadly identified where and how change will happen in Camden (with the potential for significant effects on European sites having been screened out through HRA).
- 1.5 The SALP will build on the policies in the adopted Local Plan by allocating key areas of change and individual sites and setting out specific policies for how they should be developed. The SALP will also replace the site allocations identified in the adopted Fitzrovia Area Action Plan.
- 1.6 The North London Waste Plan (NLWP) is a joint waste plan for six boroughs within the North London Waste Authority Area (Camden, Haringey, Hackney, Barnet, Enfield and Waltham Forest). This Plan has now passed examination and will, on adoption, become part of Camden’s development plan. The NLWP identifies a range of suitable sites for the management of all North London’s waste up to 2031 and includes policies and guidelines for determining planning applications for waste development. It does not identify any waste sites in Camden.
- 1.7 The new London Plan is being prepared by the Mayor of London. In December 2019, the Mayor published his response to the Inspectors’ report (who examined the Plan). The Secretary of State, who has the power to direct changes to the London Plan, is considering the Mayor’s response (as of Feb 2020). AECOM were appointed by the Mayor to undertake an HRA of the Draft London Plan.

- 1.8 The objective of this assessment is to identify any aspects of the SALP that would cause a likely significant effect on any Natura 2000 sites, otherwise known as European sites, either in isolation or in combination with other plans and projects. These European sites are: Special Areas of Conservation (SACs) which protect habitats and Special Protection Areas (SPAs) which protect birds. Ramsar sites which protect wetlands should also be considered.
- 1.9 The Habitats Directive applies the 'precautionary principle' to European sites. Plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the site(s) in question. Plans and projects with predicted adverse effect on European sites may still be permitted if there are no alternatives to them and there are imperative reasons of overriding public interest as to why they should go ahead. In such cases, compensation would be necessary to ensure the overall integrity of the Natura 2000 network.
- 1.10 The legislation sets out a multi-stage process. An initial analysis is undertaken in order to determine whether there are likely to be 'significant effects' – this report. If it is not possible to conclude that there will not be likely significant effects, then in order to ascertain whether or not a site(s) integrity will be affected, an 'appropriate assessment' should be undertaken of the plan or project in question.

The legislative basis for HRA / Appropriate Assessment

- 1.11 Habitats Directive 1992
Article 6 (3) states that:
“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”.

- 1.12 Conservation of Habitats and Species Regulations 2010
The Regulations state that:
“A competent authority, before deciding to...give any consent for a plan or project which is likely to have a significant effect on a European site....shall make an appropriate assessment of the implications for the site in view of that site’s conservation objectives...The authority shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site”.

It should be noted that the Council undertook an HRA screening assessment on the Camden Local Plan, adopted in 2017, which concluded that the Plan was not likely to result in significant effects or impact on the integrity of any European Site. The Local Plan set borough wide targets for housing, employment and retail growth in the Borough and also indicated where significant levels of growth/change were expected to occur.

- 1.13 National Planning Practice Guidance states:
“The local plan may also require a Habitats Regulations Assessment if it is considered likely to have significant effects on habitats, sites or species located in the local planning authority’s area or in its vicinity.” Paragraph: 037 Reference ID: 61-037-20190315

“The Inspector will require the local planning authority to consult on all proposed main modifications. Depending on the scope of the modifications, further Sustainability

- 1.14 This Habitats Regulations Assessment Screening Assessment will be submitted to the Secretary of State with the SALP and other submission documents for consideration at the Independent Examination. The examination Inspector will consider the soundness of the SALP, using this Habitats Regulations Assessment as part of the evidence base.
- 1.15 The scope of the work should be proportionate to the geographical scope of the plan and the nature and extent of any effects identified. The HRA should be confined to the likely significant effects on the internationally important habitats and species for which a site is designated.

2. Methodology

- 2.1 There is no formal central Government guidance on HRA, although general EU guidance on HRA does exist (European Commission (2001): 'Assessment of plans and projects significantly affecting Natura 2000 Sites: Methodological Guidance on the Provisions of Article 6(3) and 6(4) of the Habitats Directive').
- 2.2 Figure 1 below outlines the stages of HRA according to Department of Communities and Local Government (DCLG) advice:

Evidence gathering – collecting information on relevant European sites, their conservation objectives and characteristics and other plans or projects.

HRA Task 1 – likely significant effects ('screening') – identifying whether a plan is 'likely to have a significant effect' on a European site

HRA Task 2 – ascertaining the effect on site integrity – assessing the effects of the plan on the conservation objectives of any European sites 'screened in' during HRA Task 1

HRA Task 3 – mitigation measures and alternative solutions – where adverse effects are identified at HRA Task 2, the plan should be altered until adverse effects are cancelled out fully.

Assessing likely significant effects (i.e. HRA Task 1 – this report)

- 2.3 Following evidence gathering, the first stage of any Habitats Regulations Assessment and the purpose of this assessment is a 'likely significant effect' test – essentially a risk assessment to decide whether subsequent stages, ie. an Appropriate Assessment is required. The essential question is:

"Is the Plan, either alone or in combination with other relevant projects and plans, likely to result in a significant effect upon European sites?"

- 2.4 The objective is to 'screen out' those plans or projects that can, without any detailed appraisal, be said to be unlikely to result in significant adverse effects upon European sites, usually because there is no mechanism for an adverse interaction with European sites.

- 2.5 In evaluating significance, the Council has relied on its professional judgement as well as the results of previous stakeholder consultation regarding development impacts on the European sites considered within this assessment.
- 2.6 An effect will be ‘significant’ if it could undermine the site’s conservation objectives. The ‘test of significance’ can generally be interpreted as any negative effects that are not negligible or inconsequential; ‘likely’ is interpreted as a simple question of whether the plan or project concerned is capable of having an effect.

Identification of relevant sites

- 2.7 The European sites within approximately 10km of the London Borough of Camden have been identified on the Joint Nature Conservation Committee (JNCC) website and shown in Map 1 below. There are no internationally designated sites in the Borough of Camden. Richmond Park is just beyond the 10km radius, but for completeness is included in the Screening Assessment.

Site name	Designation and Code
Epping Forest	Special Area of Conservation SAC (UK0012720) Essex, Outer London
Lee Valley	Special Protection Area SPA (UK9012111) Ramsar (UK11034) Essex, Outer London, Hertfordshire
Richmond Park	Special Area of Conservation SAC (UK0030246) Outer London
Wimbledon Common	Special Area of Conservation SAC (UK0030301) Outer London

- 2.8 The description for these sites and the rationale for their conservation at European level has been taken from the “Draft London Plan Habitats Regulations Assessment”, AECOM, November 2017, which also includes supplementary information to assess the vulnerability of the sites to potential adverse effects. This is presented in Table 2. The contents were compiled from the Natura 2000 forms, Natural England’s ‘conservation objectives’ for Sites of Special Scientific Importance (SSSIs) with European interest and the JNCC and Natural England websites.
- 2.9 It is considered that the SALP is unlikely to have any measurable effects on sites beyond 10km due to the absence of reasonable impact pathways.
- 2.10 Table 2 identifies the key reasons for the designation of each European site and also summarises the conclusions of the emerging London Plan’s HRA in relation to the potential of significant effects on the sites from policies contained in the draft London Plan. It should be noted that any effects on European sites can also be minimised through the implementation of other pan-London strategies (such as the Mayor’s Transport Strategy – which is particularly relevant to reducing air pollution) and ‘management/improvement plans’ for the individual sites which have been prepared

collaboratively by stakeholders to manage/monitor potential environmental impacts, e.g. from additional visitor pressure and pollution.

Map 1. Natura 2000 sites

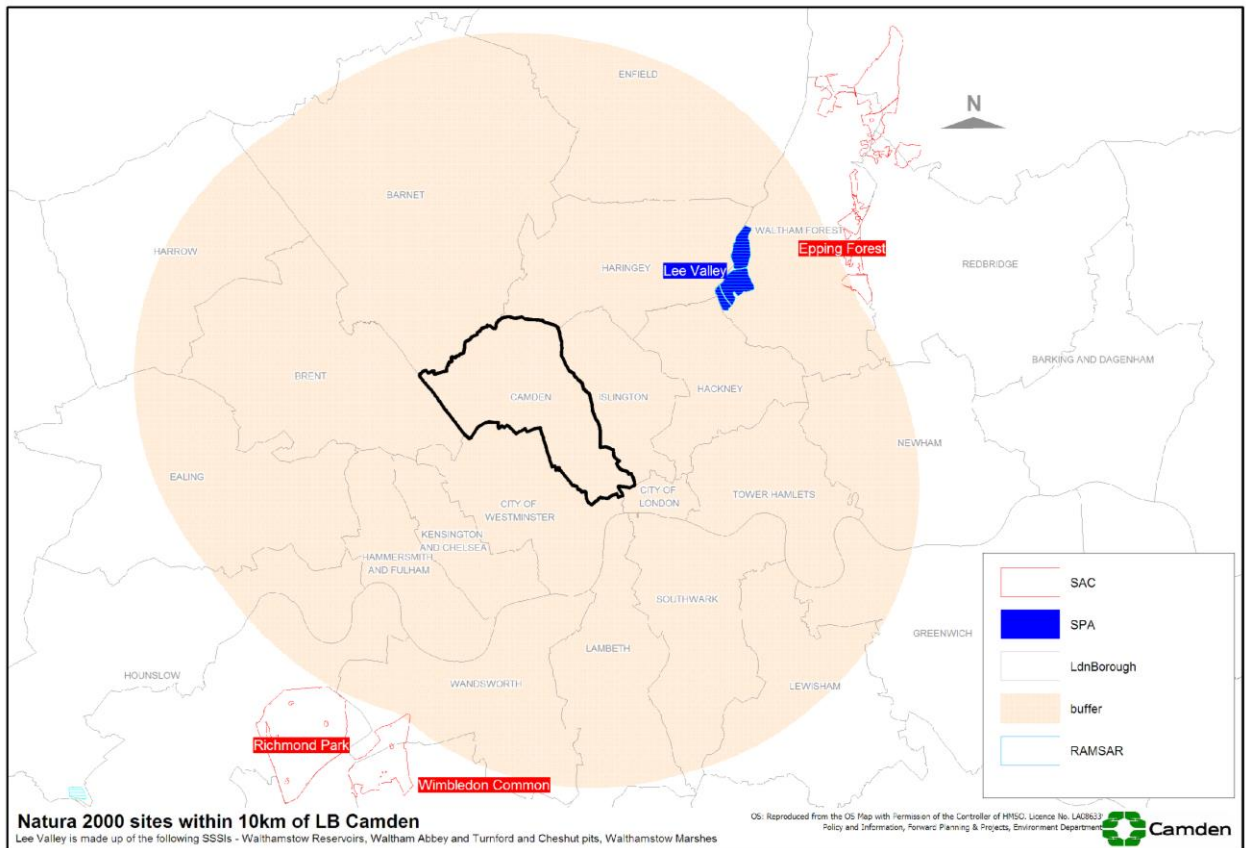


Table 2. Natura 2000 site descriptions

Definitions

Qualifying Features - habitats and species relevant to the awarding of EU conservation status. The AA identifies how these features are safeguarded.

Current Condition and Threats - provides information concerning the current status of sites, recognised trends, and potential threats

Favourable condition - the SSSI is being adequately conserved and is meeting its 'conservation objectives', however, there is scope for enhancement

Unfavourable recovering condition - often known as 'recovering'. SSSIs are not yet fully conserved but all the necessary management measures are in place. Provided that the recovery work is sustained, the SSSI will reach favourable condition in time. In many cases, restoration takes time.

Unfavourable no change - the special interest of the SSSI is not being conserved and will not reach favourable condition unless there are changes to site management or external pressures. The longer the SSSI unit remains in this poor condition, the more difficult it will be, in general, to achieve recovery.

Unfavourable declining - the special interest of the SSSI is not being conserved and will not reach favourable condition unless there are changes to site management or external pressures. The site condition is becoming progressively worse.

Site Name	Designation & Code	Qualifying Features		Current Condition and Threats	Condition	Key ecosystem factors
		Habitat	Species			
Epping Forest	SAC UK0012720	Beech forests on acid soils with Ilex and sometimes Taxus in the shrublayer; Wet heathland with cross-leaved heath; and Dry heath.	Stag beetle <i>Lucanus cervus</i>	Air Pollution; Public disturbance; Inappropriate water levels; Water pollution	The current condition of Epping Forest SAC is reported here: https://designatedsites.naturalengland.org.uk/SiteSACFeaturesMatrix.aspx?SiteCode=UK0012720&SiteName=Epping%20Forest%20SAC The SAC is made	Epping Forest straddles the Essex/East London boundary. It is predominantly made up of broad-leaved deciduous woodland with dry grassland and steppes and some inland water bodies. Recreational pressure: The SAC receives a high number of visits (over 4 million a year) and there are long-standing concerns about increased recreational

Site Name	Designation & Code	Qualifying Features		Current Condition and Threats	Condition	Key ecosystem factors
		Habitat	Species			
					<p>up of multiple monitoring units. Most record: 'Favourable' or 'Unfavourable recovering'</p>	<p>use resulting in damage to its interest features. A 2011 visitor survey report identified that those living within 2km of the edge of the Forest comprise at least 95% of all visitors, although another 2014 survey found 89% of people lived within 5km of the SAC.</p> <p>Overall the main points of visitor origin in London appear to be residents of LB Redbridge and LB Waltham Forest. Outside London the southern part of Epping Forest District is a major source of visitors, particularly the chain of settlements to the east of the SAC: Loughton, Theydon Bois and Buckhurst Hill.</p> <p>The draft London Plan HRA recommended that the boroughs above should devise a mitigation strategy (including consideration of per dwelling tariffs) to minimise the impacts of additional residents on the SAC. It also recommended</p>

Site Name	Designation & Code	Qualifying Features		Current Condition and Threats	Condition	Key ecosystem factors
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						<p>monitoring of such strategies.</p> <p>Air quality: The SAC is affected by relatively poor air quality alongside the roads that traverse the SAC, negatively affecting the epiphytic lichen communities of the Forest as well as other features. The nature of the road network around Epping Forest means that journeys between a number of key settlements involves traversing the SAC.</p> <p>The South Essex/East Hertfordshire HMA authorities have agreed to work collaboratively with Essex County Council, Hertfordshire County Council, Highways England and the Corporation of London to devise a strategy to address the traffic flows through the SAC and facilitate improved roadside air quality in the SAC.</p> <p>The draft London Plan HRA</p>

Site Name	Designation & Code	Qualifying Features		Current Condition and Threats	Condition	Key ecosystem factors
		Habitat	Species			
						<p>notes measures set out by the Mayor to improve air quality within the GLA boundary. Further, measures in the Mayor's Transport Strategy and by Transport for London will assist in delivering air quality improvements.</p> <p>Natural England has published detailed advice on conserving and restoring site features of the Epping Forest SAC (23 January 2019)</p>
Lee Valley	SPA UK9012111 RAMSAR UK 11034		Birds (Wintering) Bittern <i>Botaurus stellaris</i> (Migratory) Gadwall <i>Anas strepera</i> Shoveler <i>Anas clypeata</i> It also qualifies as a Ramsar site under Criterion 2: nationally	Water pollution; Hydrological changes; Recreational disturbance including angling; Atmospheric pollution	The population of bird species and condition of the habitat is monitored by Natural England: https://designatedsites.naturalengland.org.uk/SiteGeneralDetail.aspx?SiteCode=UK9012111&SiteName=&countyCode=21&responsiblePerson=&unitId=&SeaArea=&IFCAArea=	<p>The Lee Valley is located to the north-east of London and comprises a series of embanked water supply reservoirs, sewage treatment lagoons and former gravel pits.</p> <p>The whole RAMSAR site is within the Lee Valley Regional Park, with a large area forming the River Lee Country Park. It supports high levels of visitor pressure, principally for angling, walking, cycling, birdwatching and boating.</p>

Site Name	Designation & Code	Qualifying Features		Current Condition and Threats	Condition	Key ecosystem factors
		Habitat	Species			
			<p>scarce plant species whorled water-milfoil <i>Myriophyllum verticillatum</i> and the rare/vulnerable invertebrate water-boatman <i>Micronecta minutissima</i></p> <p>Under Criterion 6: species/populations occurring at levels of international importance, ie. Northern shoveler and Gadwall.</p>			<p>Recreational pressure: Landowners/managers have undertaken initiatives both to facilitate and to promote greater public access for recreation.</p> <p>Walthamstow Wetlands – a key component of the Lee Valley in London had previously been an underused recreational resource. Subject, to long-term visitor monitoring of this site, the draft London Plan's HRA does not consider recreational activity is currently an issue for growth.</p> <p>There are management plans/measures to route people away from sensitive areas and minimise disturbance while accommodating high numbers of visitors.</p> <p>Air quality: Phosphate availability, rather than nitrogen deposition, was considered to be of more relevance in the draft London Plan HRA. It notes this is not</p>

Site Name	Designation & Code	Qualifying Features		Current Condition and Threats	Condition	Key ecosystem factors
		Habitat	Species			
						<p>something that planning policies can directly influence.</p> <p>Water resources: Water levels for the reservoirs are controlled by Thames Water and have been largely responsible for creating the circumstances that led to the site being of international importance for species. There are no wastewater treatment works with catchments within the GLA boundary that discharge into the River Lee or its tributaries.</p> <p>Natural England has developed a Site Improvement Plan for the Lee Valley, published in 2014.</p>
Richmond Park	SAC UK0030246		The population of stag beetle <i>Lucanus cervus</i>	None specifically identified in the Natural England Site Improvement Plan, although loss of habitat (dead wood) would directly affect the stag beetle population.	The current condition of Richmond Park SAC is reported here: https://designatedsites.naturalengland.org.uk/SiteSACFeaturesMatrix.aspx?Si	Richmond Park lies in SW London and has a large number of ancient trees with decaying timber. The SAC is made up of broad-leaved deciduous woodland, improved and dry grassland, heath and scrub.

Site Name	Designation & Code	Qualifying Features		Current Condition and Threats	Condition	Key ecosystem factors
		Habitat	Species			
					teCode=UK0030246&SiteName=Richmond%20Park%20SAC All units are 'Favourable' or 'Unfavourable recovering'	<p>Recreational pressure It is located in an urban setting and as such is potentially vulnerable to recreational pressure and urbanisation. The site is designated as an SAC only for its stag beetle population, which is dependent upon mature trees and deadwood. The continuing presence of the stag beetle is largely dependent on good habitat management.</p> <p>Air quality While stag beetles themselves are not vulnerable to nitrogen deposition, this can negatively impact on woodland features such as ground flora diversity/structure.</p> <p>These impacts may be offset by planning policies to reduce traffic flows and wider improvements in vehicle technologies.</p> <p>Development anticipated by the draft London Plan is</p>

Site Name	Designation & Code	Qualifying Features		Current Condition and Threats	Condition	Key ecosystem factors
		Habitat	Species			
						unlikely to have a significant impact on the habitat, and population, of the stag beetle in Richmond Park.

Site Name	Designation & Code	Qualifying Features		Current Condition and Threats	Condition	Key ecosystem factors
		Habitat	Species			
Wimbledon Common	SAC UK0030301	Northern Atlantic wet heaths with Erica tetralix European dry heaths	Stag beetle <i>Lucanus cervus</i>	Inappropriate behaviour by some visitors (e.g. collection and removal of dead wood); Habitat fragmentation; Invasive species (specifically the oak processionary moth); Atmospheric pollution (nitrogen deposition)	The current condition of Wimbledon Common SAC is reported here: https://designatedsites.naturalengland.org.uk/SiteGeneralDetail.aspx?SiteCode=UK0030301&SiteName=wimbledon%20common&countyCode=&responsiblePerson=&SeaArea=&IFCAArea= All but one of the monitoring units are 'Favourable'; the other is 'Unfavourable, no change'.	Wimbledon Common is also located in SW London and has a large number of old trees with fallen decaying timber. The SAC is made up primarily of a mix of dry grassland/steppes and broad-leaved deciduous woodland. Recreational pressure: The site does not have a high level of accessibility and has an urban setting, and is therefore likely to have a more local core recreational catchment. It is unlikely this significantly extends beyond 5km, though it is known occasionally recreational events for Londoners are held on the Common (e.g. 'Run through'). The heathlands of the SAC are theoretically vulnerable to recreational pressure and Wimbledon Common generally (not just the SAC component) is a popular site for visitors. Most of the heath fails to

Site Name	Designation & Code	Qualifying Features		Current Condition and Threats	Condition	Key ecosystem factors
		Habitat	Species			
						<p>meet key targets for quality – although the actual extent of the heathland is increasing due to a programme of tree and scrub removal.</p> <p>The main hotspots of recreational usage at the SAC are not the heathland areas but grassland, which does not represent SAC features.</p> <p>The draft London Plan HRA considered that in general a <i>lack of</i> physical disturbance and trampling (which can retard encroachment by scrub), from both people and grazing animals, is more of a concern for the heathland areas than excessive footfall. If there were significant recreational impacts, these are likely to be generated by residents living in proximity to the heathland in LB Merton and Wandsworth and the Royal Borough of Kingston upon Thames.</p> <p>Air quality: An area of heathland within</p>

Site Name	Designation & Code	Qualifying Features		Current Condition and Threats	Condition	Key ecosystem factors
		Habitat	Species			
						<p>the SAC lies within 200m of the A3 and A219 roads. Average background nitrogen deposition rates within the SAC exceed the minimum part of the critical load range for heathland.</p> <p>The draft London Plan HRA notes policies in the London Plan aimed at improving air quality in London and measures in the Mayor's Transport Strategy and by Transport for London to reduce traffic levels.</p>
<p>Sources: Epping Forest: Joint Nature Conservation Committee (https://sac.jncc.gov.uk/site/UK0012720); Lee Valley: Ramsar Sites Information Service (https://rsis.ramsar.org/ris/1037?language=en) and Lee Valley SPA (https://designatedsites.naturalengland.org.uk/SiteGeneralDetail.aspx?SiteCode=UK9012111&SiteName=&countyCode=21&responsiblePerson=&unitId=&SeaArea=&IFCAArea=); Richmond Park: Joint Nature Conservation Committee (https://sac.jncc.gov.uk/site/UK0030246) and Wimbledon Common: Joint Nature Conservation Committee (https://sac.jncc.gov.uk/site/UK0030301)</p>						

Screening assessment of Camden's Site Allocations Local Plan (SALP)

Coding the potential impacts

2.11 Table 3 below provides a version of the coding criteria produced by Tyldesley and Associates guidance on Appropriate Assessments. These criteria are used to assess whether the draft SALP is likely to impact on European sites.

Table 3. Coding used for recording effects/impacts on European Sites

Reason why policy will have no effect on a European Site	
1	The policy will not itself lead to development (e.g. it relates to design or other qualitative criteria for development, or it is not a land use planning policy)
2	The policy makes provision for a quantum / type of development (and may or may not indicate one or more broad locations)
3	No development could occur through this policy alone, because it is implemented through other DPD policies that are more strategic or more detailed and therefore more appropriate to assess for their effects on a European Site and associated sensitive areas.
4	Concentration of development in urban areas will not affect European Site and will help to steer development and land use change away from a European Site and associated sensitive areas.
5	The policy will help to steer development away from a European Site and associated sensitive areas, e.g. not developing in areas of flood risk or areas otherwise likely to be affected by climate change.
6	The policy is intended to protect the natural environment, including biodiversity.
7	The policy is intended to conserve or enhance the natural, built or historic environment, and enhancement measures will not be likely to have any effect on a European Site.
Reason why policy could have a potential effect	
8	The policy steers a quantum or type of development towards, or encourages development in, an area that includes a European Site or an area where development may indirectly affect a European Site.
Reason why policy would be likely to have a significant effect	
9	The policy makes provision for a quantum, or kind of development that in the location(s) proposed would be likely to have a significant effect on a European Site. The proposal must be subject to appropriate assessment to establish, in light of the site's conservation objectives, whether it can be ascertained that the proposal would not adversely affect the integrity of the site.

Source: *Screening report: 'Draft Further Alterations to the London Plan'* (Forum for the Future, September 2006)

Policy Analysis

2.12 Table 4 below provides an assessment using the coding in Table 3 above, taking a precautionary approach, of each the area and site policies contained in Camden Council's SALP.

Table 4. Screening of the policies and site allocations contained within the draft SALP

Policy No	Policy	Why policy will have no impact on sites	Why the policy is likely to have an impact on sites	Essential recommendations to avoid potential effects on European Sites
KQ1	Supporting growth in the Knowledge Quarter Innovation District	2, 4		
BC1	Bloomsbury Campus Area	2, 4		
BC2	Development sites in the Bloomsbury Campus Area	2, 3, 4		
CGY1	Camden Goods Yard Area	2, 4		
CGY2	Morrisons Supermarket	2, 4		
CGY3	Morrisons Petrol Filling Station	2, 4		
CGY4	100 Chalk Farm Road	2, 4		
CGY5	Juniper Crescent	2, 4		
CGY6	Network Rail land at Juniper Crescent	2, 4		
CGY7	Gilbey's Yard	2, 4		
CGY8	Camden Lock Market and the Interchange	2, 4		
CSP1	Camley Street and St Pancras Way Area	2, 4		
CSP2	120-136 Camley Street	2, 4		
CSP3	104-114 Camley Street and Cedar Way Industrial Estate	2, 4		
CSP4	Parcelforce Site and ATS Tyre Site	2, 4		
CSP5	St Pancras Hospital	2, 4		
CSP6	Shorebase Access Site	2, 4		
CSP7	Other Development Sites in the Camley Street and St Pancras Way Area	2, 3, 4		
HCG1	Holborn and Covent Garden Area	2, 4		

HCG2	Former Central St Martins College	2, 4		
HCG3	1 Museum Street	2, 4		
HCG4	135-149 Shaftesbury Avenue	2, 4		
HCG5	Other Development Sites in the Holborn and Covent Garden Area	2, 3, 4		
KT1	Kentish Town Area	2, 4		
KT2	Regis Road Growth Area	2, 4		
KT3	Murphy Site	2, 4		
KT4	Kentish Town Police Station	2, 4		
KT5	369-377 Kentish Town Road ('Car wash site')	2, 4		
KT6	Kentish Town Fire Station	2, 4		
KT7	Highgate Centre, Highgate Road	2, 4		
WHI1	West Hampstead Interchange Area	2, 4		
WHI2	02 Centre, car park and car showrooms site	2, 4		
WHI3	13 Blackburn Road	2, 4		
WHI4	188-190 Iverson Road	2, 4		
WHI5	Other Development Sites in the West Hampstead Interchange Area	2, 3, 4		
IDS1	Network Building and 88 Whitfield Street	2, 4		
IDS2	Former Tottenham Mews Day Hospital	2, 4		
IDS3	Central Cross, 18-30 Tottenham Court Road and 1&2 Stephen Street	2, 4		
IDS4	85 Camden Road	2, 4		
IDS5	Shirley House 25-27 Camden Road	2, 4		
IDS6	Camden Town over station development	2, 4		
IDS7	Buck Street Market (Camden Market) 192-200 Camden High Street	2, 4		

IDS8	Grand Union House, 18-20 Kentish Town Road	2, 4		
IDS9	202-204 Finchley Road	2, 4		
IDS10	Gondar Gardens Reservoir	2, 4		
IDS11	Wending Estate and St Stephens Close	2, 4		
IDS12	Former Mansfield Bowling Club	2, 4		
IDS13	West Kentish Town	2, 4		
IDS14	Royal Free	2, 4		
IDS15	330 Gray's Inn Road	2, 4		
IDS16	Belgrove House	2, 4		
IDS17	Former Thameslink Station	2, 4		
IDS18	Land bounded by Pakenham Street and Wren Street	2, 4		
IDS19	Land to the rear of the British Library	2, 4		
IDS20	Other Development Sites	2, 3, 4		

Commentary on SALP impacts

- 2.13 Taking the 'precautionary approach', the increased population anticipated for Camden could have indirect impacts on the European sites. These potential indirect impacts are: increased recreational demand, increased demand for clean water and decreases in air quality. The following will outline whether these impacts are considered significant.
- 2.14 The impact of the SALP on European sites has been considered in combination with other plans and projects, notably the new/emerging London Plan and adopted Camden Local Plan 2017.
- 2.15 The SALP identifies a range of suitable locations for housing, employment and other uses. It includes a combination of area-based policies and individual site allocations. These policies seek to *complement* strategic policies in the Camden Local Plan and emerging London Plan. 'Other development sites' listed in the SALP do not set detailed policy, their intention is to specify safeguarded uses which have generally been agreed through previous allocation or an existing planning permission. Camden's unique and diverse environment means that the wording of each area/site policy is bespoke so that it can respond to location specific issues and opportunities.
- 2.16 The SALP ['Sustainability Appraisal – Interim Report'](#) identifies summarises the policy objectives for each of the main groupings/clusters in the SALP and identifies how existing Camden Local Plan policies apply to these areas.

Knowledge Quarter: An area of research based organisations around King's Cross, Euston Road and Bloomsbury. This area is identified in the Local Plan. The SALP does not intend to alter the Local Plan policy approach.

Bloomsbury Campus: There is no identified policy approach in the Local Plan for this area. The intention through drafting and early engagement has been to reinforce the existing character and position on higher education and supporting uses.

Camden Goods Yard: There is no identified policy approach in the Local Plan, there is a Planning Framework adopted in 2017. The framework highlights the area's opportunities being a large and historically significant area. It has the opportunity to provide a substantial number of new homes, a range of commercial space, and improved public realm.

Camley Street and St Pancras Way: Camley Street is identified in the Local Plan as a focus area for the Council's Community Investment Programme. The area is characterised by mainly industrial, storage and distribution uses that are predominantly single storey. There is an emerging Neighbourhood Plan and a Planning Framework drafted by the Council for mixed use redevelopment.

Holborn and Covent Garden: Holborn is identified in the Local Plan as a growth area with a number of aspirations for the development of the area. This does not include Covent Garden, which is designated as a specialist shopping area in the Local Plan. The intention through drafting and early engagement is to reinforce the existing character of the area.

Kentish Town: This area has been identified in the Local Plan as a 'highly accessible area' considered to be suitable for a range of land uses and high density development. The Kentish Town Industry Area is protected in the Local Plan, with consideration given to higher intensity redevelopment for employment uses. A

Neighbourhood Plan applies in this area and a draft Planning Framework. The SALP does not intend to alter the policy approach for this area.

West Hampstead Interchange: This has been identified as a growth area in the Local Plan and Fortune Green West Hampstead Neighbourhood Plan. A list of priorities for development have been made for this area in the Local Plan, in addition to objectives for development in the Neighbourhood Plan. The SALP does not intend to alter the policy approach for this area.

- 2.17 The above areas are where the majority of new housing and employment development is expected to come forward during the plan period. The SALP intends to ensure that where development takes place it makes efficient use of land and responds to the needs and aspirations of the Council as well as Camden's residents and businesses. It builds in particular on the growth chapter of the Local Plan, the Council's adopted and emerging planning frameworks for the areas (which form supplementary planning guidance), and neighbourhood plans (where they exist) prepared by community groups. The SALP embeds in policy the main overarching development principles and infrastructure priorities for these areas.
- 2.18 The draft SALP policies consider how sustainable development can be achieved in social, economic and environmental terms. The Sustainability Appraisal of the SALP identifies and evaluates the likely significance of effects.
- 2.19 With regards to potential increased pressure on the European sites from additional recreational demand the Lee Valley is the closest European site to Camden (-see Map 1). The SALP's policies set out where additional infrastructure is needed to manage the effects of growth. This includes identification of new public open space, urban greening measures (including additional biodiversity corridors), new/improved public routes and areas of public realm improvement (as well as requirements for existing key spaces/routes to be protected). This will reduce the need for residents/workers to use open spaces outside of the Borough. In addition Local Plan policies and the Council's adopted CPG on Public Open Space (March 2018) requires new and improved open space provision to meet the needs of new development within the Borough.
- 2.20 The SALP also aims to enhance biodiversity across the borough and cross-references the Council's potential application of 'Urban Greening Factors' (set out in the emerging London Plan, which will have a benefit for biodiversity). Due to the distance of the European nature conservation sites from Camden, it is not considered that there is likely to be a significant effect from Camden's SALP.
- 2.21 The anticipated increase in population for Camden could result in additional demand for clean water, which could place pressure on the reservoirs that form part of the European sites, specifically the Lee Valley. Policy CC3 of the adopted Camden Local Plan aims to protect water infrastructure within the Borough to ensure there is adequate water supply and storage capability for Camden. This will place less pressure on reservoirs outside the borough. Whilst Camden policies cannot specifically protect the reservoirs, the London Plan recognises there is limited additional water resources in this part of the UK and over time options like new reservoirs may have to be considered.
- 2.22 Policy CC3 of the Local Plan also seeks to ensure efficient water use in new and refurbished developments and where possible, the reuse and recycle water to ensure less fresh water is required, placing less pressure on reservoirs. Paragraph 1.11 of the draft SALP states: *"This Plan should be read in conjunction with other policies in*

our development plan and therefore policies within it are not intended to repeat existing Local Plan policies". Water resource management and sustainable drainage measures are examples of matters which the existing Local Plan policies address.

- 2.23 The SALP also says: *"The absence of a reference to one of these matters in the area and site policies in this document should not be interpreted as meaning it is not relevant at this location"*. Also, as the SALP emerges, the Council has committed to prepare an 'Infrastructure Delivery Plan' (see SALP page 16) to identify area/site specific projects as relevant, to mitigate both the impact of individual sites and the cumulative impact of new growth. This means that where stakeholders identify the need for a specific infrastructure intervention for an individual site/cluster, the next stage of the SALP can include this as a policy requirement. Therefore, it is unlikely that the SALP will have a significant impact on the European sites due to increased water consumption.
- 2.24 An increase in population in Camden could also result in increased levels of atmospheric pollution through emissions created by the construction and occupation of development or from the vehicle journeys created. The SALP identifies the need for air quality to be considered as part of the Council's requirement for Construction Management Plans (CMPs) (see SALP page 11). While it is also an area largely controlled by existing planning policies - e.g. Policy CC4 of the Camden Local Plan, the draft SALP identifies areas where air quality improvements are considered to be especially needed: this includes the Holborn Covent Garden area, the Kentish Town area and West Hampstead Interchange area.
- 2.25 As stated above, the SALP also aims to secure additional greening measures in development schemes, including new public open space and tree planting and there is an expectation that the new neighbourhoods proposed for the Kentish Town area and Camden Goods Yards will be exemplary in terms of sustainability (in its widest sense), with an aspiration for Kentish Town to be a zero carbon development and Camden Goods Yard to deliver carbon neutral development. Policies throughout the SALP also aim to reduce the dominance of traffic and car parking (where relevant), with associated air quality benefits. Therefore, it is unlikely that the SALP will have a significant impact on the European sites due to increased levels of atmospheric pollution.
- 2.26 Recent case law, including *People Over Wind & Sweetman v. Coillte Teoranta* (C-323/17) has clarified that mitigation intended to reduce significant effects should not be taken into account at the screening stage – rather, this should form be considered as part of the HRA's Appropriate Assessment. This Screening Opinion is based on the effects of the SALP's policies which include some elements of mitigation with regards to impacts on recreational pressure/biodiversity, water management, air quality and other areas. It does not include consideration of additional specific mitigation measures to mitigate a particular identified significant effect on a European site.

3. Conclusion

- 3.1 The proposed draft SALP policies in combination with other plans and projects are not considered likely to have significant effects on the sites of European importance for habitats or species, or an adverse impact on the integrity of the sites. This Screening assessment has considered the scope of the SALP and its relationship with other plans, in particular the adopted Camden Local Plan and emerging London Plan. Therefore it is not considered necessary to carry out Task 2 (Appropriate Assessment) and Task 3 (mitigation and alternative solutions) of the Habitats Regulations Appropriate Assessment.
- 3.2 This Screening Assessment will be shared with Natural England for comments and will be reconsidered as necessary based on their advice following consultation on the draft SALP.

References

The draft Camden Site Allocations Plan Local Plan (SALP), including SA-Interim Report:

<https://www.camden.gov.uk/draft-site-allocations-consultation>

The adopted Camden Local Plan (2017)

<https://www.camden.gov.uk/camden-local-plan1>

Intend to Publish London Plan 2019, including IIA Addendum Report Dec 2019 and HRA Report 2019

<https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/intend-publish-london-plan-2019>

Draft London Plan Habitats Regulations Assessment, AECOM (November 2017)

<https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/draft-new-london-plan/habitats-regulations-assessment>