

Harlow District Council

HRA Screening Report – Non-Technical Summary

Final
October 2010



Photographs courtesy of Harlow District Council

Revision Schedule

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Rev	Date	Details	Prepared by	Reviewed by	Approved by
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Non-Technical Summary

1.1.1 Introduction

Scott Wilson has been appointed by Harlow District Council to assist in undertaking a Habitat Regulations Assessment (HRA) of the potential effects of their Core Strategy (CS) Issues and Options, on the *Natura 2000* network.

The HRA process arises from the EU Habitats Directive, whereby land use plans (such as Core Strategies) are subject to examination and consultation to determine whether they might have a significant effect on a Natura 2000 site (Special Areas of Conservation, SACs; Special Protection Areas, SPAs; and Ramsar sites).

In the case of Harlow, there are four sites that require consideration because there are 'pathways' by which spatial development policy within the district may have potential to adversely affect the designated sites. These sites are:

- Wormley-Hoddesdonpark Woods SAC (1 on Figure 1)
- Epping Forest SAC (2 on Figure 1)
- Lee Valley SPA (3 on Figure 1)
- Lee Valley Ramsar site (4 on Figure 1)

Spatial development plans and projects can have effects on European designated sites through a number of 'pathways' or mechanisms and in the case of Harlow, the relevant pathways are:

- Urbanisation – effects of proximity of populations (e.g. cat predation)
- Recreational pressure
- Reduced air quality
- Reduced water quality
- Reduced water resources or altered hydrological conditions

These are the pathways by which Harlow's Core Strategy Issues and Options have been assessed for potential adverse effects on the European designated sites listed above.

1.1.2 HRA Screening

Screening of Harlow CS Issues and Options has generated the conclusion that at this stage, all but nine of the strategic objectives assessed can be screened out as having no likely significant effect on European designated sites. Tables 5 and 6 within Chapter 5 of the report provide greater detail, but the following bullet points summarise the HRA screening observations regarding the nine strategic objectives that could not be 'screened out':

- Promote growth in sustainable locations – the CS identifies that 'definition of extent of the greenbelt' may form one of the policy areas to be considered under this objective. A pathway exists for significant effects on the four European sites covered by this HRA through enabling development in closer proximity than is currently the case;

- To identify sites in Harlow to meet local needs and aspirations – the CS identifies that ‘provision of housing to meet local needs and aspirations’ and ‘indication of the location of growth’ will form two of the policy areas to be considered under this objective. A pathway exists for significant effects on the four European sites covered by this HRA since the quantum (and to a lesser extent spatial distribution) of development is likely to be the principal influence on the scale and likelihood of any effects arising from pathways of impact identified in section 1.1.1 of this Executive Summary, particularly when considered in the context of almost 75,000 new dwellings that are likely to be delivered by surrounding authorities from 2011 to 2031.
- Enhancing and reinforcing Harlow’s sub-regional role and improving the town’s image - the CS identifies that *‘Develop and diversify the role of Harlow as a gateway to Europe and as a major location for employment, retail and leisure’* will form one of the policy areas to be considered under this objective. A pathway exists for significant effects on the four European sites covered by this HRA since employment development within Harlow could lead in particular to increased vehicle movements on roads that lie within 200m of these sites (Epping Forest SAC in particular), especially when considered in the context of almost 75,000 new dwellings that are likely to be delivered by surrounding authorities from 2011 to 2031.
- Meeting the employment needs of the town – most of the policy areas that the CS intends to explore within this objective could lead to significant effects for the same reasons as ‘Enhancing and reinforcing Harlow’s sub-regional role and improving the town’s image’.
- The remaining five strategic objectives that could not be screened out (‘Reinforcing Harlow’s reputation as a key centre for Research and Development’, ‘Enhancing and diversifying educational and skills training opportunities in the town’, ‘Encourage diversification and investment in the towns employment base’, ‘Regenerating the town centre and reinforcing its retail role in the sub region. Protecting and enhancing neighbourhood centres and hatches’ and ‘Enhance and promote the role of Harlow as a transport interchange along the M11 corridor’) - could operate with other employment growth initiatives and increased housing to result in increased vehicle movements on roads that lie within 200m of the four European sites covered by this HRA (Epping Forest SAC in particular), especially when considered in the context of almost 75,000 new dwellings that are likely to be delivered by surrounding authorities from 2011 to 2031.

1.1.3 Conclusions and Next Steps

At this stage it is not possible to screen out development within Harlow as having no likely significant effect on European designated sites. In part, this is due to constraints that operate at a scale greater than the district itself (e.g. road transport on the M25) which fall into consideration as ‘in combination’ effects. When firmer growth options are available, a more detailed Appropriate Assessment will be required in order to determine whether any additional impacts arising from development within Harlow will be acceptable.

In order to be able to conclude no likely significant effects on European designated site, the Council should seek to ensure:

- Clarification is made regarding waste water and sewerage issues arising from proposed growth; specifically where this will take place, how the infrastructure requirements will be met; and how this will be delivered in a timely manner.

- Clarification as to the ability to meet water resource requirements to support development, so that it can be concluded that adverse impacts on the Lee Valley SPA/Ramsar will be avoided.
- Details are provided relating to the quantum and function of green spaces, and the timeliness and mechanism of their delivery, building on approaches outlined within the Issues and Options.
- The Council should continue to promote alternative modes of transport to car usage, and should commit to undertaking a transport analysis of any plans to increase linkages between Harlow and the M11, which should include a projection for increased volumes (and network capacity) between the proposed new junction and the M25 orbital that would result from growth within the district. This would enable an evidence-based approach to determining whether development in Harlow contributes to LSE on Epping Forest SAC through reduced air quality.