

Strategic Environmental Assessment and Habitats Regulation Assessment Screening Report

Roman Road Bow Neighbourhood Plan

Statement of Reasons

August 2021



Contents

1. Introduction	3
2. The Roman Road Bow Neighbourhood Plan	4
3. Neighbourhood Area Characteristics	7
4. Legislative and Policy Context	10
5. Screening Exercise	14
6. Assessment of Likely Significant Effects	18
7. Habitats Regulation Assessment Screening	30
8. Conclusion	32
9. Consultation.....	33

1. Introduction

- 1.1. This screening exercise outlines the Council's consideration of whether the proposed Roman Road Bow Neighbourhood Plan (Regulation 14 consultation version) should be subject to a Strategic Environmental Assessment (SEA) or Habitats Regulation Assessment (HRA).
- 1.2. This document constitutes the Council's Statement of Reasons for whether the Roman Road Bow Neighbourhood Plan requires a Strategic Environmental Assessment, as set out under Regulation 9 of the Environmental Assessment of Plans and Programmes Regulations 2004. It is accompanied by a Determination Letter.

2. The Roman Road Bow Neighbourhood Plan

2.1. The Roman Road Bow Neighbourhood Plan covers the period between 2021 and 2031, and applies to the designated Roman Road Bow Neighbourhood Area as set out in figure 1 below. The draft neighbourhood plan can be viewed at <http://romanroadbowneighbourhoodplan.org/plan>, and the evidence base can be viewed at <http://romanroadbowneighbourhoodplan.org/evidence>.



Figure 1: Roman Road Bow Neighbourhood Planning Area

2.2. The vision of the plan (set out in section 3) is “for step-by-step improvements led by the community, to protect and enhance a neighbourhood where everyone feels they belong”.

2.3. This will be achieved through six objectives as set out in the table below:

<p>Objective 1: Thriving high street and local economy</p>	<p>“Bow neighbourhood offers a wider variety of shops and other amenities. There are fewer vacant units, Roman Road having adapted its offer to reflect the range of different needs of the population, providing a more lively and safe local centre throughout the day and into the evening. Overall, retail is a smaller part in the local economy, the district centre having a broader range of uses and activities, including, the charitable sector, leisure, arts and culture, health and social care services. Modern local landmarks such as Bow House Business Centre are fully</p>
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	occupied, and provide much needed space for businesses and other local groups.”
Objective 2: Green streets that encourage walking and cycling	“By 2031, we have a proper network of pedestrian and cycle connections and supporting infrastructure such as secure short-term cycle parking. The area is more accessible to get to and move around in. Liveable Neighbourhoods funding has delivered a network of attractive green routes that are safe to use. Instead of driving, people choose to walk and cycle, reducing local traffic volumes, associated air pollution and parking issues.”
Objective 3: Beautiful public spaces	“By 2031, investment has transformed the public realm by creating green and de-cluttered local streets. Popular play areas designed to encourage free play and a love of nature now replace previously neglected spaces. The former car park on the corner of Roman Road and St Stephens Road plays a valuable role as a community space. The improved public realm has helped to reduce anti-social behaviour. Residents and businesses are proud of their high quality, litter free environment - fly-tipping is no longer tolerated following vigorous campaigning and local action by the community.”
Objective 4: New life for our local heritage	“By 2031, an updated Bow Heritage Trail links historic buildings, parks, galleries, pubs and restaurants, street market and shops along pedestrian friendly routes. Undervalued heritage assets such as the Three Colts and Parnell Road bridges over the Hertford Canal are better conserved. Our precious heritage resource is protected and enhanced to ensure that it continues to be appreciated and enjoyed by future generations.”
Objective 5: High quality, affordable housing	“By 2031, new developments over the last decade are well integrated with existing communities, retaining the character of local neighbourhoods without destroying locally listed assets. A majority of the homes are low carbon homes. Roman Road CLT has pioneered a few affordable and well designed community-led housing schemes around Bow. Incremental, small scale residential projects over time have created a greater variety of housing types. These projects reflect the local housing need and area and successfully promote community cohesion.”

Objective 6: Resilient and well-networked community infrastructure	“By 2031 funding from new developments has enabled the creation of new places for young people to meet and there is an established and financially stable network of community groups running activities and facilities supporting the diverse population in the area. Grassroots organisations, child and youth groups, arts and performance organisations and places of worship are part of a community consortium, working together identifying and agreeing funding opportunities for provision of new or expansion of existing facilities or activities across the Neighbourhood Plan Area.”
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Table 1: Roman Road Bow Neighbourhood Plan Objectives

2.4. Under each of these objectives are a number of ‘policies’ and ‘actions’. Section 1 of the neighbourhood plan explains that the policies are those which are considered land-use policies; and the actions are elements which are considered to be “aspirations and actions which [...] are not specifically related to land use matters and therefore sit outside the jurisdiction of a neighbourhood plan”. These are equivalent to the “wider community aspirations” referenced in the neighbourhood planning PPG, which can be included in a neighbourhood plan as long as they are clearly identified (Ref: 41-004-20190509).

3. Neighbourhood Area Characteristics

3.1. This section of the report summarises the characteristics of the Roman Road Bow Neighbourhood Area with relevance to environmental, economic, and social sustainability.

Environmental

3.2. Air quality: The entire borough of Tower Hamlets is designated an Air Quality Management Area. Large parts of the neighbourhood area are also highlighted as an area of substandard air quality on the Local Plan policies map. The eastern part of the neighbourhood area, adjacent to the A12 has particularly large sections of poor air quality, stretching as far west as Fairfield Road and Parnell Road. Zones of poor air quality are also found along and adjacent to Mile End Road, Grove Road, Roman Road, Old Ford Road, and Tredegar Road, and include parts of Bow School, Phoenix School, and the Central Foundation Girls School. A map of these areas of poor air quality can be seen below.

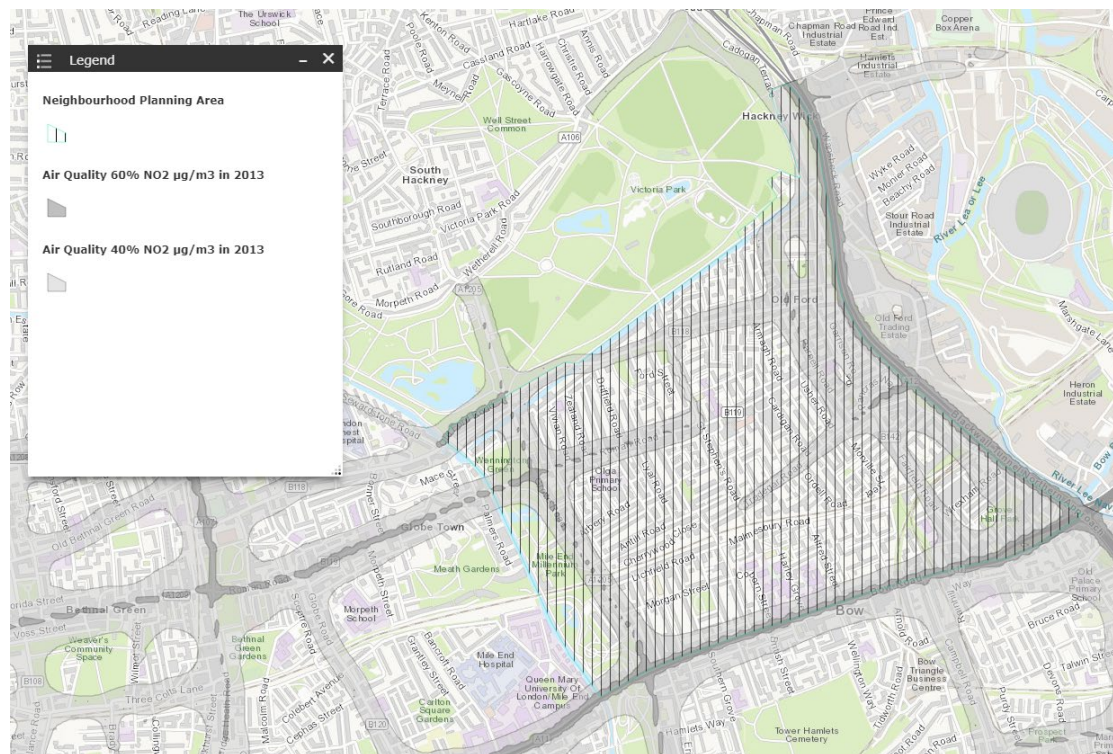


Figure 2: Air quality in Roman Road Bow Neighbourhood Area

3.3. Flood risk: None of the neighbourhood area is within a flood zone or an area of flood risk.

3.4. Trees: There are clusters of protected trees at Tredegar Square; between Addington Road and Alfred Street; in the streets around Wrexham Road; on the Bow Church island; at the open space south of Blondin Street; where Fairfield Road meets the train tracks; and at Printers Mews; and a lone protected apple tree on Aberavon Road.

3.5. Biodiversity: The area contains Sites of Importance for Nature Conservation (SINCs) at Mile End Park (including Wennington Green), the London Canals SINC (in this instance referring to parts of the Regent’s Canal and Hertford Union Canal), and an area of disused railway in the northeastern corner of the area. There are small pockets identified as areas of deficiency of access to nature on the Local Plan policies map, at Thomas Fyre Drive, Hereford Road and Candy Street.

3.6. Natura 2000 sites: There are five sites protected under European legislation within 15km of the area – these will be relevant for the HRA screening later in this document. The sites are Epping Forest, Richmond Park, and Wimbledon Common Special Areas of Conservation; Lee Valley Special Protection Area; and the Lee Valley Ramsar site.

Social

3.7. Open space: There are public open spaces at Mile End Park, Wennington Green, Tredegar Square Gardens, Selwyn Green, St Stephen’s Road, Gladstone Place, Harley Grove, Four Seasons Green, Garrison Road, and Grove Hall Park. The Lea Valley Regional Park also runs along the Hertford Union Canal in the north of the neighbourhood area, and the area is adjacent to Victoria Park.

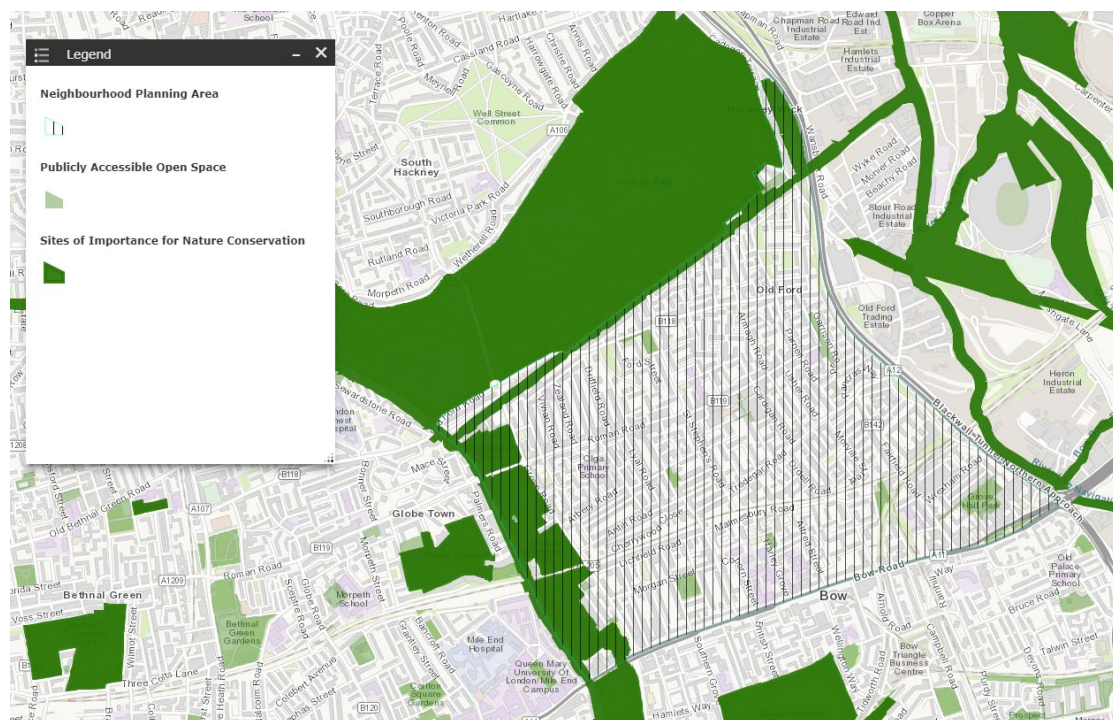


Figure 3: Open space in Roman Road Bow Neighbourhood Area

3.8. Conservation: Conservation Areas cover much of the neighbourhood area. This includes the whole of the Conservation Areas for Tredegar Square, Clinton Road, Driffield Road, Medway, Roman Road Market and Fairfield Road; and parts of the Victoria Park and Regent’s Canal Conservation Areas. The area includes the

Tier 2 archaeological priority areas of London to Colchester Roman Road, Old Ford, Tower Hamlets Post-Med Burial Grounds (at Holy Trinity Church), and Bow; and the Tier 3 archaeological priority area of Lea Valley. The Parnell Road and Three Colts bridges are scheduled monuments.

3.9. Listed buildings: There are many statutory listed buildings in the area, particularly in the southern part of the area. Of these, five are Grade II* listed, with the rest listed at Grade II. The Grade II* buildings are: Three Colts Bridge, Parnell Road Bridge, Church of St Mary Stratford Bow, 26 Tredegar Square, and the Phoenix School. There are also a number of locally listed buildings in the area.

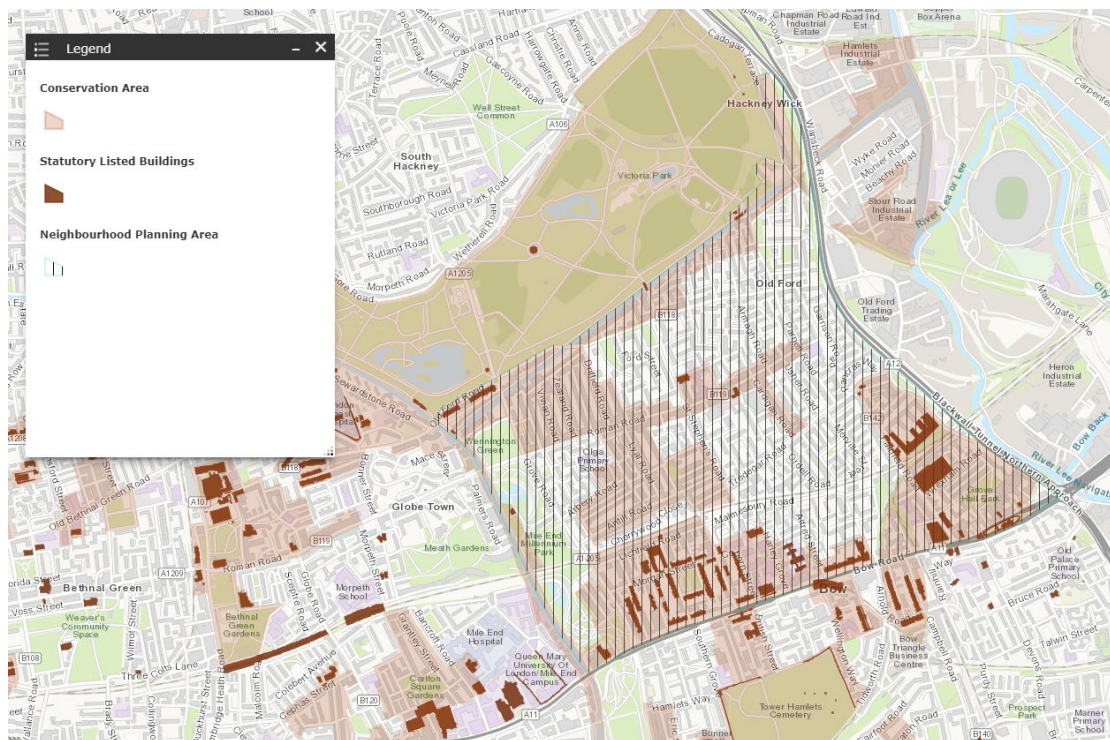


Figure 4: Heritage in Roman Road Bow Neighbourhood Area

Economic

3.10. Employment Areas: There are no designated employment or industrial areas within the neighbourhood area.

3.11. Town Centres: Roman Road East District Centre runs east-west through the middle of the neighbourhood area, and part of Mile End Neighbourhood Centre enters the neighbourhood area at the south along Grove Road and Mile End Road.

3.12. Site allocations: Under the Local Plan, the area contains no site allocations.

4. Legislative and Policy Context

Sustainability Appraisal (SA)

- 4.1. A Sustainability Appraisal (SA) considers the potential impacts of a planning policy document on the environmental, economic, and social aspects of sustainability. It does this by assessing the extent to which the planning document will help achieve a set of sustainability objectives that cover a range of issues, including air quality, landscape, water, health and the population. The SA also has to satisfy the requirements of the European Directive 2001/42/EC on the assessment of the effects of certain planning documents and programmes on the environment (known as the Strategic Environmental Assessment Directive – for more information, see below).
- 4.2. There is a statutory requirement for SAs to be produced for Development Plan Documents, but not for other kinds of planning documents. There is no legal requirement for an SA to be produced for a neighbourhood plan (PPG on Strategic Environmental Assessment and Sustainability Appraisal, paragraph 026).
- 4.3. An SA was undertaken in 2017 as part of the Integrated Impact Assessment (IIA) of the Tower Hamlets Local Plan 2031, with an addendum added in March 2019 to cover modifications to the plan. The plan (and its SA) underwent an examination in public and was adopted in January 2020.
- 4.4. The sustainability objectives for the Local Plan SA were developed through a comparison of existing sustainability objectives in the borough, the objectives of the Local Plan, and the identification of sustainability issues through the scoping process for the IIA. The SA was publicly consulted on as part of the consultation process for the Local Plan. The sustainability objectives from that SA are set out in the table below.

- 1. Equality:** reduce poverty and social exclusion and promote equality for all communities.
- 2. Liveability:** promote liveable, safe, high quality neighbourhoods with good quality public services.
- 3. Health and wellbeing:** improve the health and wellbeing of the population and reduce health inequalities.
- 4. Housing:** ensure that all residents have access to good quality, well-located, affordable housing that meets a range of needs and promotes liveability.
- 5. Transport and mobility:** create accessible, safe and sustainable connections and networks by road, public transport, cycling and walking.
- 6. Education:** increase and improve the provision of and access to childcare, education and training facilities and opportunities for all age groups and sectors of the local population.
- 7. Employment:** reduce worklessness and increase employment opportunities for all residents.

- 8. Economic growth:** create and sustain local economic growth across a range of sectors and business sizes.
- 9. Town centres:** promote diverse and economically thriving town centres.
- 10. Design and heritage:** enhance and conserve heritage and cultural assets; distinctive character and an attractive built environment.
- 11. Open space:** enhance and increase open spaces that are high quality, networked, and multi-functional.
- 12. Climate change:** ensure the Local Plan incorporates mitigation and adaption measures to reduce and respond to the impacts of climate change.
- 13. Biodiversity:** protect and enhance biodiversity, natural habitats, water bodies and landscapes of importance.
- 14. Natural resources:** ensure sustainable use and protection of natural resources, including water, land and air, and reduce waste.
- 15. Flood risk reduction and management:** to minimise and manage the risk of flooding.
- 16. Contaminated land:** improve land quality and ensure mitigation of adverse effects of contaminated land on human health.

Table 2: Tower Hamlets Local Plan Integrated Impact Assessment Sustainability Objectives (2017)

Strategic Environmental Assessment (SEA)

- 4.5. A Strategic Environmental Assessment (SEA) is an assessment of the likely effects of a plan or programme on the environment. The requirement for an SEA is set out in the SEA Directive (2001/42/EC), transposed into UK law through the Environmental Assessment of Plans and Programmes Regulations 2004 (known as the SEA Regulations). This particularly relates to plans which designate sites for development.
- 4.6. The purpose of an SEA is to ensure a high level of protection of the environment and to integrate consideration of the environment into the preparation and adoption of plans with a view to promoting sustainable development. SEAs must take account of the likely significant effects on the environment, including on issues such as biodiversity, population and human health, fauna, flora, soil, water, air quality, climate, material assets, cultural heritage, landscape, and the interrelationship between these factors. The SEA process sets out criteria for assessing the significance of the impact of a plan on the environment. If a significant effect is possible the assessment requires the consideration of alternative options.
- 4.7. The SA is a more stringent process, aimed at more important plans and programmes; the SEA, while still thoroughly assessing a proposed plan or programme, does not require quite the same level of detail. The requirements of the SEA are subsumed within the requirements of the SA – that is, an SA requires all the detail expected of an SEA, and then more. Therefore, the objectives developed as part of the SA of the Local Plan can be extracted to cover the required considerations for an SEA. The correspondence between the

SA objectives and the likely significant effects for an SEA to consider are set out in Appendix C of the Integrated Impact Assessment, and summarised in the table below. These are the SA objectives that will be used when considering the effects of the Roman Road Bow Neighbourhood Plan for the purpose of the SEA screening.

SEA Dimension	Relevant SA Objective
Biodiversity, Flora and Fauna	13. Biodiversity
Population and Human Health	2. Liveability 3. Health and Wellbeing
Soil	14. Natural Resources 16. Contaminated Land
Water	14. Natural Resources 15. Flood Risk Reduction and Management
Air Quality	14. Natural Resources
Climate	12. Climate Change
Material Assets	14. Natural Resources 15. Flood Risk Reduction and Management 16. Contaminated Land
Cultural Heritage	10. Design and Heritage
Landscape	10. Design and Heritage 11. Open Space

Table 3: Correspondence between SEA dimensions and SA objectives

4.8. A neighbourhood plan is considered to be a plan or programme as defined by the SEA Regulations. Under Article 3(3) of the SEA Directive, plans or programmes which “determine the use of small areas at a local level” or constitute “minor modifications to plans and programmes” only require an SEA if there are likely to be significant environmental effects. Regulation 9 of the SEA Regulations requires the responsible authority (Tower Hamlets Council in this case) to undertake a screening exercise to determine whether or not a plan or programme is likely to have significant environmental effects and would therefore be subject to an SEA. This is also set out in the PPG on Strategic Environmental Assessment and Sustainability Appraisal, paragraph 027.

4.9. The screening exercise looks at the proposals in the neighbourhood plan to see if a significant effect is likely. The criteria for the screening exercise are set out in the relevant legislation, and explained in the next section of this report.

Habitats Regulation Assessment (HRA)

4.10. Habitats Regulation Assessment (HRA) is a process which looks at the potential impact of proposals within a plan (either individually or in combination with others) on European protected wildlife sites – consisting of Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar

wetland sites. This assessment is required by the European Habitats Directive (92/43/EEC), transposed into UK law as the Conservation of Habitats and Species Regulations 2010.

- 4.11. The initial stage of the HRA process involves consideration of the reasons for designation and the conservation objectives of each designated wildlife site within a reasonable distance of the neighbourhood plan area, and the potential impact of proposals within the plan on these sites.

5. Screening Exercise

5.1. The process of screening a plan or programme to determine whether an SEA is required is set out in figure 5 below. This figure is taken from A Practical Guide to the Strategic Environmental Assessment Directive, issued by the Office of the Deputy Prime Minister in 2005¹. This approach is commonly used in SEA screening exercises at the current time.

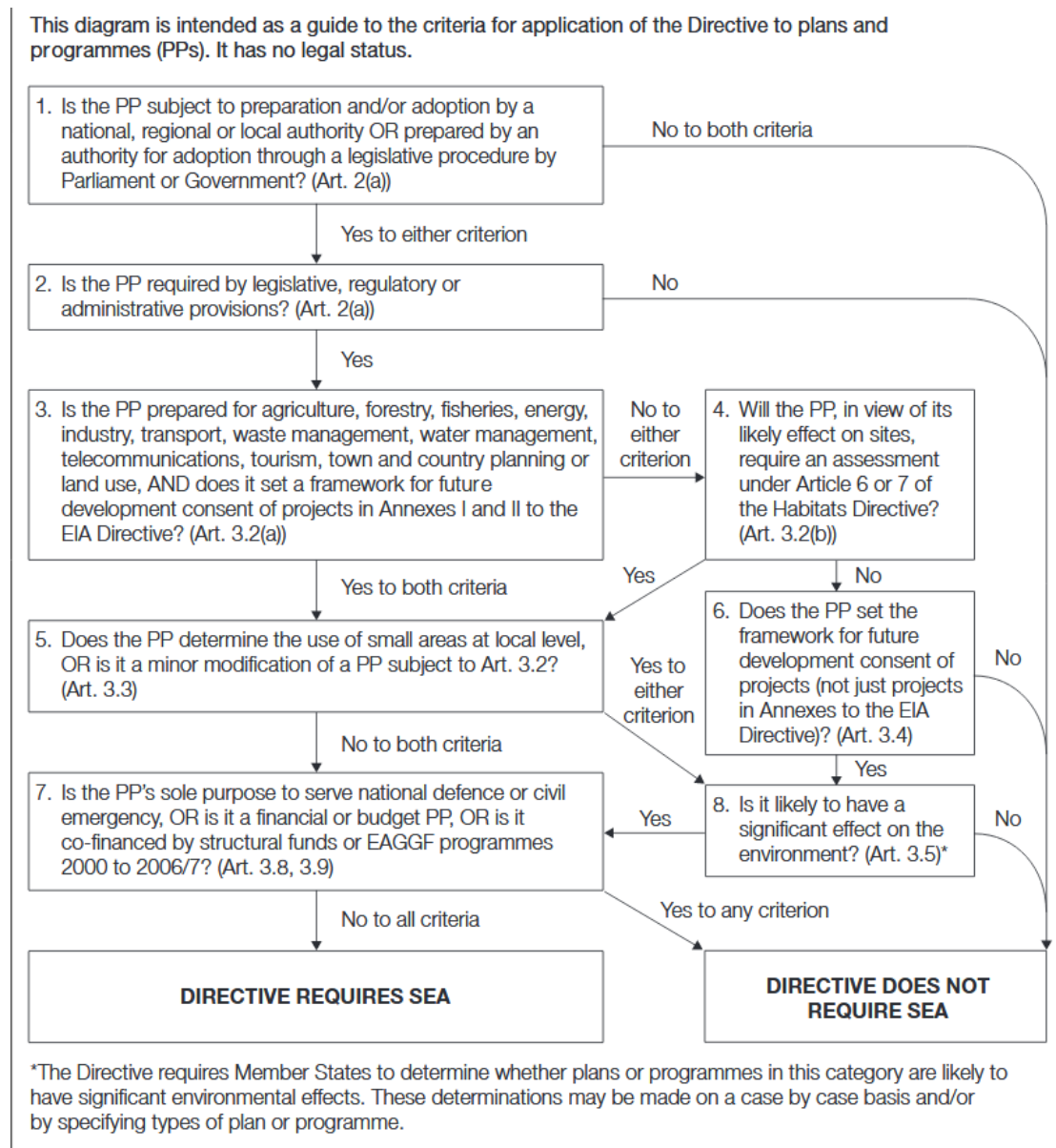


Figure 5: Application of the SEA Directive to plans and Programmes

5.2. Table 4 below assesses the Roman Road Bow Neighbourhood Plan against the criteria in figure 5.

Stage	Y/N	Reason
<p>1. Is the plan subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Article 2(a))</p>	Y	<p>Neighbourhood plans are prepared by a qualifying body under the Town and Country Planning Act 1990 (as amended). The qualifying body in this instance is the Roman Road Bow Neighbourhood Forum. The preparation of a neighbourhood plan is subject to the Neighbourhood Planning (General) Regulations 2012 and the Neighbourhood Planning (Referendums) Regulations 2012. A neighbourhood plan is subject to examination and referendum. If a neighbourhood plan receives more than 50% 'yes' votes at referendum it will be 'made' (adopted) by the Council as Local Planning Authority. The Roman Road Bow Neighbourhood Plan is therefore subject to adoption by a local authority. Proceed to step 2.</p>
<p>2. Is the plan required by legislative, regulatory or administrative provisions? (Article 2(a))</p>	N	<p>The preparation of a neighbourhood plan is optional. However, once 'made' it does form part of the statutory Development Plan for the area and is used when making decisions on planning applications. It is therefore considered important that the screening process considers whether the Roman Road Bow Neighbourhood Plan is likely to have significant environmental effects invoking the need for a full SEA, and the assessment should proceed to step 3.</p>
<p>3. Is the plan prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, AND does it set a framework for future development consent of projects</p>	Y	<p>A neighbourhood plan can include these policy areas and could provide at a neighbourhood area level the framework for development of a scale that would fall within Annex II of the EIA Directive. Developments that fall within Annex I are 'excluded' development for neighbourhood plans (as set out in Section 61k of the Town and Country Planning Act 1990, as amended). The policies included in</p>

<p>in Annexes I and II to the EIA Directive? (Article 3.2(a))</p>		<p>the Roman Road Bow Neighbourhood Plan are considered to be for town and country planning and land use purposes. The EC document ‘Interpretation of definitions of project categories of annex I and II of the EIA Directive’ notes that “housing developments...are frequently included in the ‘urban development projects’ category”, under Annex II (10)(b) of the EIA Directive. The Roman Road Bow Neighbourhood Plan sets a framework for future development consents for housing projects, and therefore both criteria are fulfilled. The assessment should skip step 4 and proceed to step 5 (following the flow chart in figure 5).</p>
<p>5. Does the plan determine the use of small areas at local level, OR is it a minor modification of a plan or programme subject to Article 3.2? (Article 3.3)</p>	<p>Y</p>	<p>A neighbourhood plan can determine the use of small areas at a local level. The policies in the Roman Road Bow Neighbourhood Plan do contribute to determining the uses of small areas at a local level, in the sense that the policies in the plan will be used to determine planning applications within the neighbourhood area, and encourage particular uses on some sites – particularly with relation to local green spaces and employment and housing allocations. Therefore the assessment should skip steps 6 and 7 and proceed to step 8 (following the flow chart in figure 5).</p>
<p>8. Is it likely to have a significant effect on the environment? (Article 3.5)</p>	<p>?</p>	<p>A neighbourhood plan could potentially have an effect on the environment. However, whether this effect is significant depends on the proposals within the neighbourhood plan. This requires individual assessment of each neighbourhood plan. A detailed assessment of the Roman Road Bow Neighbourhood Plan can be found in section 6 of this report.</p>

Table 4: SEA Screening of the Roman Road Bow Neighbourhood Plan

- 5.3. The conclusion of the assessment is that an SEA is only required if the neighbourhood plan is likely to have significant effects on the environment. Section 6 of this report provides a detailed assessment of the policies of the Roman Road Bow Neighbourhood Plan to determine whether this is the case.
- 5.4. Section 7 of this report will then screen the Roman Road Bow Neighbourhood Plan to determine whether a full HRA is required.

6. Assessment of Likely Significant Effects

6.1. The criteria for assessing the likely significance of effects stemming from a plan or programme are set out in Annex II of the SEA Directive (Schedule 1 of the SEA Regulations), and are quoted below in table 5.

<p>1. The characteristics of plans, having regard, in particular, to:</p> <ul style="list-style-type: none">• The degree to which the plan sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources• The degree to which the plan influences other plans and programmes including those in a hierarchy• The relevance of the plan for the integration of environmental considerations in particular with a view to promoting sustainable development• Environmental problems relevant to the plan• The relevance of the plan for the implementation of Community [i.e. European Community] legislation on the environment (e.g. plans and programmes linked to waste management or water protection) <p>2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:</p> <ul style="list-style-type: none">• The probability, duration, frequency and reversibility of the effects• The cumulative nature of the effects• The transboundary nature of the effects• The risks to human health or the environment (e.g. due to accidents)• The magnitude and spatial extent of the effects (geographical area and size of the population to be affected)• The value and vulnerability of the area likely to be affected due to:<ul style="list-style-type: none">• Special natural characteristics or cultural heritage• Exceeded environmental quality standards or limit values• Intensive land-use• The effects on areas or landscapes which have a recognised national, [European] Community or international protection status

Table 5: Criteria for determining likely significance of effects on the environment

6.2. This section of the report will assess the impact of each of the policies in the Roman Road Bow Neighbourhood Plan, taking into account the sustainability objectives from the 2017 IIA of the Tower Hamlets Local Plan 2031. These are the most recent sustainability objectives developed for the borough, and are therefore considered the most relevant objectives to use in this assessment. All of the relevant SA objectives will be listed, but only significant effects on the SA objectives that correspond to the requirements of the SEA legislation (as set out in table 3 above, and emphasised in bold in table 6 below) will be considered to trigger the requirement for a full SEA. As non-statutory community aspirations, the 'actions' set

out in the neighbourhood plan have not been assessed, as these are not considered to form a plan or policy and will not be used to assess planning applications.

6.3. The Roman Road Bow Neighbourhood Plan as a whole will then be assessed against the criteria in table 5 to determine the likelihood of significant effects on the environment. Table 6 below assesses the likely effects of the policies in the Roman Road Bow Neighbourhood Plan.

Neighbourhood Plan Policy	Relevant Sustainability Objective(s)	Assessment of Significance
Policy LE1: Encouraging Flexible Use of Premises	Town Centres	The Local Plan IIA concluded that the synergistic and cumulative effects of the Local Plan policies would be positive against this objective. The neighbourhood plan policy does not propose any additional development, but encourages flexibility in town centre uses and describes some of the methods by which this flexibility may be achieved. This is in line with national policy on town centre uses following recent changes to the Use Classes Order, which have encouraged further flexibility of these uses. It is also broadly in line with the sustainability objective, which is to 'promote diverse and economically thriving town centres'. This policy is unlikely to have any significant negative sustainability impacts. It is considered that no additional assessment is required.
Policy GS1: Improving Safe Walking and Cycling Routes	Health and Wellbeing Transport and Mobility	The Local Plan IIA concluded that the synergistic and cumulative effects of the Local Plan policies would be positive against these objectives. The neighbourhood plan policy sets out a number of priority routes for improvements to walking and cycling in the neighbourhood area. This is consistent with the aims and objectives of the Local Plan, and the policy is unlikely to have any significant negative sustainability impacts. It is considered that no additional assessment is required.
Policy PS1: Enhancing Public Realm Spaces	Health and Wellbeing Design and Heritage Open Space	The Local Plan IIA concluded that the synergistic and cumulative effects of the Local Plan policies would be positive against these objectives. The neighbourhood plan policy identifies a number of existing spaces to be prioritised for improvement. This policy is

		unlikely to have any significant negative sustainability impacts. It is considered that no additional assessment is required.
Policy PS2: Designating Local Green Spaces	Health and Wellbeing Open Space	The Local Plan IIA concluded that the synergistic and cumulative effects of the Local Plan policies would be positive against these objectives. The neighbourhood plan policy utilises the Local Green Spaces mechanism set out in the NPPF, and is therefore considered an appropriate approach to this issue, which is unlikely to have any significant negative sustainability impacts. In the Regulation 14 version of the neighbourhood plan, some of the spaces identified already have protection under other designations such as Metropolitan Open Land. Although this replication is unnecessary, it is not considered to have any sustainability impact. It is considered that no additional assessment is required.
Policy HE1: Public Houses to Become Locally Designated Heritage Assets	Town Centres Design and Heritage	The Local Plan IIA concluded that the synergistic and cumulative effects of the Local Plan policies would be positive against these objectives. The neighbourhood plan policy identifies a number of public houses that should be considered as locally-designated heritage assets. In the Regulation 14 version of the neighbourhood plan, some of the buildings that have been identified already have statutory or local listed status, and all of the unlisted buildings are within conservation areas. While the repetition of existing designations is unnecessary, it is clear that all of the identified buildings have some level of protection under the Local Plan, and that this policy is therefore in conformity with the Local Plan in this area. On this basis, the policy is unlikely to have any significant

		negative sustainability impacts. It is considered that no additional assessment is required.
Policy HE2: Bow Wharf Waterway Infrastructure Conservation and Enhancement	Health and Wellbeing Design and Heritage	The Local Plan IIA concluded that the synergistic and cumulative effects of the Local Plan policies would be positive against these objectives. The neighbourhood plan policy requires a heritage plan to be developed in advance of any development of this site, and for any development to contain a range of uses. It does not appear to specifically allocate the site for any particular kind of development. The policy is consistent with the aims and objectives of the Local Plan, and is unlikely to have any significant negative sustainability impacts. It is considered that no additional assessment is required.
Policy H1: Site Allocation and Housing Development	Housing	The Local Plan IIA concluded that the synergistic and cumulative effects of the Local Plan policies would be positive against this objective. The neighbourhood plan policy allocates a small site for housing development. This is estimated in the Forum's Site Assessment Report to be suitable for between 16 and 60 homes. This will have a positive impact on the sustainability objective, but it is unlikely to be a significant impact due to the small number of homes proposed. In the Local Plan process, only sites that could provide more than 500 homes were considered as potential allocations. This site is therefore significantly smaller than those assessed as part of the IIA, and would represent at the upper part of the range approximately 1.5% of the Local Plan housing target for each year, and 0.1% of the total Local Plan housing target for 2016-31. Given that the site represents such a small additional amount of housing against borough-wide targets, it is considered that there is unlikely to

		be any significant sustainability impacts that have not been assessed as part of the Local Plan IIA. It is therefore considered that no additional assessment is required.
Policy H2: Community-Led Housing	Housing	The Local Plan IIA concluded that the synergistic and cumulative effects of the Local Plan policies would be positive against this objective. The neighbourhood plan policy aims to encourage the involvement of community-led housing groups in the delivery of affordable housing. The policy is unlikely to have any significant negative sustainability impacts. It is considered that no additional assessment is required.
Policy CF1: Developing New and Improved Sports and Play Facilities	Liveability Health and Wellbeing	The Local Plan IIA concluded that the synergistic and cumulative effects of the Local Plan policies would be positive against these objectives. The neighbourhood plan policy aims to encourage the delivery of new or improved play spaces and sport facilities as part of new development in the area. The policy is consistent with the aims and objectives of the Local Plan, and is unlikely to have any significant negative sustainability impacts. It is considered that no additional assessment is required.
Policy CF2: Develop New and Improved Youth Facilities and Support	Liveability	The Local Plan IIA concluded that the synergistic and cumulative effects of the Local Plan policies would be positive against this objective. The neighbourhood plan policy aims to encourage new and improved community facilities for young people, and is consistent with the aims and objectives of the Local Plan. The policy is unlikely to have any significant negative sustainability impacts. It is considered that no additional assessment is required.

Policy CF3: Improve Existing Community Centres	Liveability	The Local Plan IIA concluded that the synergistic and cumulative effects of the Local Plan policies would be positive against this objective. The neighbourhood plan policy aims to encourage improvements to existing community facilities, and is consistent with the aims and objectives of the Local Plan. The policy is unlikely to have any significant negative sustainability impacts. It is considered that no additional assessment is required.
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Table 6: Assessment of the likely effects of policies in the Roman Road Bow Neighbourhood Plan

6.4. Table 7 below assesses the likelihood of significant environmental effects from the plan as a whole against the criteria from the SEA Directive.

Criteria	Likely significant effect? Y/N	Assessment
The degree to which the plan sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources	N	The neighbourhood plan, if adopted, will form part of the development plan for Tower Hamlets. It provides a framework of policies for assessing development proposals, but does not specify particular locations for development apart from one small site which is identified for housing. This site would provide a very minimal amount of housing against the borough-wide target set by the Local Plan, and the neighbourhood plan does not establish any additional growth targets beyond those set in the Local Plan. On this basis, the neighbourhood plan policies are considered to fall within the larger framework of the Local Plan and its accompanying Integrated

		Impact Assessment, and will not have significant environmental effects under this criterion.
The degree to which the plan influences other plans or programmes including those in a hierarchy	N	The neighbourhood plan must be in general conformity with the strategic policies of the Tower Hamlets development plan, and with the London Plan. The neighbourhood plan does not influence any higher tier plans, especially as it does not set any targets for growth or site allocations. The neighbourhood plan does not directly influence any other plans or programmes. It may have some influence on how Community Infrastructure Levy money is spent in the area, but this will be as one element in a wider process of consultation and consideration. On this basis, the neighbourhood plan is not considered to have any significant environmental effects under this criterion.
The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development	N	The neighbourhood plan must contribute to the achievement of sustainable development under national planning policy (and, consequently, in order to be in general conformity with the Local Plan and London Plan, which also have this objective). The plan contains policies which seek to contribute to environmental improvements, particularly in terms of upgrading existing public spaces and green transport routes. However, due to the scale of the plan, and the existence of policies on green spaces and transport in the Local Plan, these effects are not considered to be significant enough to require an SEA – they would fall under the scope of the existing IIA of the Local Plan. On this basis, the neighbourhood plan is not considered to have any significant environmental effects under this criterion.

<p>Environmental problems relevant to the plan</p>	<p>N</p>	<p>The environmental characteristics of the area have been identified earlier in this document, with problems primarily relating to air quality. The neighbourhood plan does not contain a standalone policy on air quality, but it is referenced as one of the policy drivers behind the policy on improved walking and cycling routes. The plan contains a policy designating sites in the area as Local Green Spaces, and this additional protection for green spaces can be seen as a positive in relation to air quality. The Local Plan contains a policy on air quality, which was assessed as part of the Local Plan IIA. The neighbourhood plan approach to air quality falls within the scope of this policy and its IIA assessment, and it is therefore considered that the neighbourhood plan will not have a significant enough effect on the environment to require an SEA.</p>
<p>The relevance of the plan for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste management or water protection)</p>	<p>N</p>	<p>The scale of the neighbourhood plan means that it is not directly relevant to the implementation of Community legislation on the environment, except in so far as it needs to be screened to determine the requirement for an HRA. However, the neighbourhood plan must be in general conformity with the Tower Hamlets development plan and the London Plan, which themselves must be in conformity with European legislation on the environment. The neighbourhood plan does not deal with waste management or water protection – and as it does not set out any additional growth targets to that in the Local Plan, and allocates only one small site for housing that would not notably alter existing development trajectories in the borough, it is considered unlikely to have a significant impact on either of these areas. It is therefore considered that the plan will not have a significant effect on the environment under this criterion.</p>

The probability, duration, frequency and reversibility of the effects	N	The neighbourhood plan does not propose any additional growth to that already set out in the Local Plan, apart from one small allocated housing site that would not have a significant impact on the borough's housing trajectory. The Local Plan was subject to an Integrated Impact Assessment, and the policies within the neighbourhood plan are considered to fall within the scope of this Local Plan IIA. On this basis, the neighbourhood plan is considered not to have significant environmental effects that have not already been assessed, and therefore presents no changes to probability, duration, frequency, or reversibility of any environmental effects.
The cumulative nature of the effects	N	The neighbourhood plan does not propose any additional growth to that already set out in the Local Plan, apart from one small allocated housing site that would not have a significant impact on the borough's housing trajectory. The cumulative impact of the policies of the Local Plan was assessed in the IIA of the Local Plan, and it was considered that there would not be negative cumulative effects. As the policies in the neighbourhood plan fall within the scope of this IIA, it is considered that they cannot contribute to any further cumulative effects, and there is therefore unlikely to be any significant environmental effects under this criterion.
The transboundary nature of the effects	N	The neighbourhood plan area borders the London Legacy Development Corporation, to the east of the neighbourhood area, and is close to the boundary with the London Borough of Hackney to the north (although this is buffered by the large green space of Victoria Park). However, as the neighbourhood plan does not propose any significant additional growth beyond that set out in the Local Plan, there are considered to be no

		additional transboundary effects that have not been considered as part of the IIA for the Local Plan. There are therefore no significant environmental effects under this criterion.
The risks to human health or the environment (e.g. due to accidents)	N	The neighbourhood plan does not contain any policies that are likely to increase the risk of harm to human health or the environment under this criterion.
The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)	N	The neighbourhood plan covers a medium-sized area in the east of the borough. While there is a significant residential population in the area, there are no Local Plan site allocations in the area, and the area is therefore not considered to be one that will see particularly high levels of residential growth in the coming years when compared to other parts of Tower Hamlets. It is therefore considered that no need for an SEA arises under this criterion.
The value and vulnerability of the areas likely to be affected due to: -special natural characteristics or cultural heritage -exceeded environmental quality standards or limit values -intensive land-use -the effects on areas or landscapes which have a recognised national, Community or international protection status	N	The characteristics of the area have been identified in section 3 of this report. There are some notable heritage assets within the area, including five Grade II* listed structures and eight conservation areas wholly or partly within the area. The area is within an Air Quality Management Area (which covers the whole borough), and large parts of the area are identified as having particularly poor air quality. The use of land in the area is intensive, and this is likely to continue to be the case for the foreseeable future, although the area is not expected to see as high levels of growth and development as some other parts of Tower Hamlets during the current Local Plan period. The plan contains policies that will have a positive environmental impact through the protection of open spaces and the encouragement of improved routes to encourage walking and cycling.

		<p>The plan contains an allocation for housing, but this is of a relatively small size, and is not considered to increase the level of intensity with which land is used in the area, or to significantly increase the level of housing delivery expected in the area. The policies in the plan are considered to fall under the scope of the Local Plan policies on the same topics, which have already been subject to an Integrated Impact Assessment, and the neighbourhood plan does not set out any level of growth beyond that in the Local Plan. On this basis, the neighbourhood plan is not considered likely to have significant environmental effects under this criterion.</p>
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Table 7: Assessment of the likelihood of significant effects on the environment from the Roman Road Bow Neighbourhood Plan

6.5. On the basis of these assessments, it is concluded that the Roman Road Bow Neighbourhood Plan will not have any significant environmental effects in relation to any of the criteria set out in Schedule 1 of the SEA Regulations. This is primarily because the Roman Road Bow Neighbourhood Plan does not set out any significant additional growth or development beyond that planned for in the Tower Hamlets Local Plan 2031, and sets out only one specific site allocation for development which could accommodate only a small amount of new housing. The Roman Road Bow Neighbourhood Plan therefore does not require a full SEA.

7. Habitats Regulation Assessment Screening

- 7.1. A Habitats Regulation Assessment (HRA) examines the potential impacts of a plan or programme, whether alone or cumulatively, on European protected sites. These sites are Special Protection Areas (SPAs) designated under the Bird Directive 79/409/EEC and Special Areas of Conservation (SACs) designated under the Habitats Directive 92/43/EEC. It is government policy that HRAs should also consider sites designated under the Ramsar Convention of 1971 (known as 'Ramsar sites') in the same way as the European protected sites.
- 7.2. The first stage of the HRA process is a screening exercise where the details of nearby designated sites are assessed to see if there is the potential for the plan or programme to have an impact on the sites. For the purposes of the screening exercise, the potential impact of the Roman Road Bow Neighbourhood Plan on designated sites within 15km of the neighbourhood area will be considered.
- 7.3. There are five European protected sites or Ramsar sites within 15km of the Roman Road Bow Neighbourhood Area. These sites are:
 - Epping Forest SAC
 - Richmond Park SAC
 - Wimbledon Common SAC
 - Lee Valley SPA
 - Lee Valley Ramsar
- 7.4. None of these sites is closer than 3km to the neighbourhood area (the closest is Lee Valley Ramsar/SPA, at around 4.3km to the boundary of the neighbourhood area), so the plan cannot influence development in the direct vicinity of any of the sites.
- 7.5. The HRA of the Tower Hamlets Local Plan 2031 identified that the main reasons for 'unfavourable' ratings of the condition of the designated sites were due to public access, air pollution, and inappropriate management. The Roman Road Bow Neighbourhood Plan cannot affect the management of these sites, and therefore the only potential for adverse impacts on these sites from development in the Roman Road Bow area would be through increased visitor pressure from a large population increase, or an increase in negative air quality impacts.
- 7.6. The Roman Road Bow Neighbourhood Plan contains a policy that aims to improve the quality of walking and cycling routes in the area, and links this to the need to improve air quality in the area, although it is considered that the impact of this policy will be no more significant than existing Tower Hamlets planning policies on this topic and is unlikely to have an effect on the designated sites.

- 7.7. The Roman Road Bow Neighbourhood Plan does not set any additional growth targets but does contain one housing site allocation that was not included in the Tower Hamlets Local Plan. The Site Options and Assessment evidence base document prepared by Aecom for the neighbourhood forum estimated that this site at Wendon Street could be suitable for between 16 and 60 new homes². Given the significant constraints on the site in terms of area and location next to the A12, it is considered likely that the number of homes that could be brought forward on the site is likely to be towards the lower end of that range. Given the very small amount of housing proposed, and the fact that this is the only housing allocation in the neighbourhood plan, it is considered that the neighbourhood plan does not propose a level of additional housing that would alter the conclusions of the Tower Hamlets Local Plan 2031 HRA screening.
- 7.8. This screening (conducted as part of the Integrated Impact Assessment of the Local Plan) concluded that the Local Plan would have no significant effects (alone or in combination) on any of the sites due to an absence of impact pathways, policy controls within the plan which can ensure significant effects are avoided, and some suggested changes to the plan which were accepted by the Council and included in the adopted Local Plan. As part of the examination process, a technical note was appended to the HRA justifying how the Local Plan HRA was in line with the outcome of the 'People Over Wind' decision, and had not considered mitigation measures as part of the HRA screening process. This position was accepted by Natural England, and the Integrated Impact Assessment (including the HRA screening) was successfully examined as part of the Local Plan examination process.
- 7.9. As the scale of development proposed by the Roman Road Bow Neighbourhood Plan does not exceed that proposed by the Local Plan to any significant extent, it is considered that the Roman Road Bow Neighbourhood Plan cannot have any additional significant impact (either by itself or cumulatively with other plans and programmes) than the Local Plan itself. The findings of the HRA screening of the Local Plan are therefore considered to apply in this situation, and no further HRA screening of the Roman Road Bow Neighbourhood Plan is required.

² <http://romanroadbowneighbourhoodplan.org/wp-content/uploads/2020/10/Roman-Road-Site-Options-and-Assessment-draft-report.pdf>, pp.37-39

8. Conclusion

- 8.1. On the basis of the SEA screening assessment carried out in this document, it is concluded that the Roman Road Bow Neighbourhood Plan will not have any significant effects in relation to the criteria set out in Schedule 1 of the SEA Regulations, and therefore does not need to be subject to a full SEA.

- 8.2. On the basis of the HRA screening assessment carried out in this document, it is concluded that the Roman Road Bow Neighbourhood Plan does not require a full HRA, as the scale of development proposed does not exceed that of the Tower Hamlets Local Plan 2031, which has already been subject to an HRA screening and found not to require a full HRA.

9. Consultation

- 9.1. The draft report was sent for consultation to the three statutory consultees – the Environment Agency, Natural England, and Historic England – as required under Regulation 11(1) of the SEA Regulations. The consultees were asked to respond within four weeks.
- 9.2. It is considered that the responses of the statutory consultees do not give rise to any further changes to the SEA/HRA Screening Report or its conclusions.
- 9.3. The Environment Agency response suggested that neighbourhood plans are considered of lower risk for environmental impacts than strategic plans, and therefore the organisation is no longer providing comments on them due to resource shortages. They attached a generic advice note on environmental issues affecting neighbourhood plans, which Council planning officers do not consider to change any of the conclusions of this report. As this advice note does not comment on any specific matters relating to the Roman Road Bow Neighbourhood Plan it has not been reproduced in this report.
- 9.4. The response from Historic England agreed with the Council’s assessment.
- 9.5. The response from Natural England agreed with the Council that an SEA is not necessary. It also stated that the screening decision should include sufficient information to assess whether protected species might be affected. In section 3 of this report we have identified that the area contains Sites of Importance for Nature Conservation, but have assessed that the level of development proposed in the neighbourhood area is unlikely to have any significant affect beyond that already assessed as part of the Local Plan Sustainability Appraisal.

Environment Agency

Date: 06/07/2021

Re: Roman Road Bow Neighbourhood Plan SEA Screening

Dear Steven

Thank you for consulting us on the Neighbourhood Plan consultation for a draft SEA and HRA screening for the Roman Road Bow Neighbourhood Plan

We have had to prioritise our limited resource and focus on strategic plans where the environmental risks and opportunities are highest. We attach our advice note which sets out our substantive response to Neighbourhood Plan consultations including Strategic Environmental Assessment screening and scoping.

We recognise that Neighbourhood Plans provide a unique opportunity to deliver enhancements to the natural environment at the local level. This advice note sets out the key environmental issues, within our remit, which should be considered. It also references sources of data you can use to check environmental features.

We hope this is helpful as you prepare evidence and the Neighbourhood Plan itself.

If you have any feedback please let us know.

Kind regards

Eleri

Eleri Randall
Sustainable Places Planning Advisor
Environment Agency - Hertfordshire & North London.

Historic England

Date:21/07/2021

Dear Mr Heywood

Roman Road Bow Neighbourhood Plan SEA Screening

Thank you for consulting Historic England on the Council's screening opinion for the Draft Roman Road Bow Neighbourhood Plan.

We note the Council's Screening Opinion and the conclusion that the proposed plan does not give rise to significant environmental effects sufficient to require full SEA. In respect of the potential impacts on the Historic Environment we are content with the Council's analysis and that the policies are in conformity to National and Local Policy, and should lead to positive impacts in respect of the Historic Environment.

To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, where Historic England consider it appropriate to do so.

Yours sincerely,
Richard Parish
Historic Buildings & Areas Advisor

Natural England

Date: 17/08/2021

Dear Mr Heywood

Roman Road Bow Neighbourhood Plan – SEA HRA Screening

Thank you for your consultation request on the above dated and received by Natural England on 1st July 2021.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Screening Request: Strategic Environmental Assessment

It is our advice, on the basis of the material supplied with the consultation, that, in so far as our strategic environmental interests (including but not limited to statutory designated sites, landscapes and protected species, geology and soils) are concerned, that there are unlikely to be significant environmental effects from the proposed plan.

Natural England concludes that a SEA is not necessary for this neighbourhood plan.

Neighbourhood Plan

Guidance on the assessment of Neighbourhood Plans, in light of the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended), is contained within the National Planning Practice Guidance. The guidance highlights three triggers that may require the production of an SEA, for instance where:

- a neighbourhood plan allocates sites for development
- the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan
- the neighbourhood plan may have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan.

We have checked our records and based on the information provided, we can confirm that in our view the proposals contained within the plan will not have significant effects on sensitive sites that Natural England has a statutory duty to protect.

We are not aware of significant populations of protected species which are likely to be affected by the policies / proposals within the plan. It remains the case, however, that the responsible authority should provide information supporting this screening decision, sufficient to assess whether protected species are likely to be affected.

Notwithstanding this advice, Natural England does not routinely maintain locally specific data on all potential environmental assets. As a result the responsible authority should raise environmental issues that we have not identified on local or national biodiversity action plan species and/or habitats, local wildlife sites or local landscape character, with its own ecological and/or landscape advisers, local record centre, recording society or wildlife body on the local landscape and biodiversity receptors that may be affected by this plan, before determining whether an SA/SEA is necessary.

Please note that Natural England reserves the right to provide further comments on the environmental assessment of the plan beyond this SEA/SA screening stage, should the responsible authority seek our views on the scoping or environmental report stages. This includes any third party appeal against any screening decision you may make.

For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

Sharon Jenkins
Operations Delivery
Consultations Team
Natural England