

Strategic Environmental Assessment and Habitats Regulation Assessment Screening Report

Holborn Vision

Supplementary Planning Document (SPD)



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1.0 Introduction

- 1.1 This screening report was prepared to consider whether the “Holborn Vision” Supplementary Planning Document (SPD) should be subject of Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) in accordance with the related national legislation and regulations.
- 1.2 The report outlines the legislative and policy framework for the respective screening regimes, before considering whether significant environmental effects are likely to arise through the SPD that would require more detailed assessments. The purpose of this Habitats Regulations Assessment (HRA) is to assess the impacts of a land-use plan against the conservation objectives of a European Site and to ascertain whether it would adversely affect the integrity of that site.
- 1.3 European sites are known as the Natura 2000 network: ‘The Natura 2000 network provides ecological infrastructure for the protection of sites which are of exceptional importance in respect of rare, endangered or vulnerable natural habitats and species within the European Community. These sites which are also referred to as European sites consist of Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Offshore Marine Site (OMS) (there are no OMS designated at present).’
- 1.4 A draft SPD was subject to two rounds of public consultation from May to July 2019 and February to April 2024. The SPD is intended to establish some key objectives and principles to guide future development and related improvements in the area covered. The nature and level of guidance supports and complements other adopted and emerging development plan documents and policies, which have undergone (or are undergoing) equivalent and more detailed assessments:
- Camden Local Plan (adopted July 2017)
 - Camden Site Allocations Plan (adopted September 2013)
 - Draft New Camden Local Plan (Regulation 18 Consultation Version - January 2024)
- 1.5 In accordance with the SEA and HRA Regulations this screening report and its conclusions were subject to consultation with the relevant statutory bodies; the Environment Agency, Historic England and Natural England.

2.0 Legal Framework

Strategic Environmental Assessment

- 2.1 SEA is a procedure that evolved in accordance with European Directive 2001/42/EC (the SEA Directive) “on the assessment of the effects of certain plans and programmes on the environment”. The SEA Directive aimed to ensure a high level of protection for the environment and to integrate environmental considerations into the preparation of plans.
- 2.2 This has been transposed into legislation by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations), which requires the formal environmental assessment of certain plans and programmes if they are determined to be likely to have significant effects on the environment.
- 2.3 The Government’s National Planning Policy Framework (NPPF) defines an SPD as a document which adds further detail to the policies in the development plan (which encompasses the London Plan, Local Plans and Neighbourhood Plans) and can be used to provide further guidance for development on specific sites, or on particular issues, such as design.

National Planning Practice Guidance states that whilst SPDs do not require Sustainability Appraisal (SA)¹ they *may in exceptional circumstances* (our emphasis) require a SEA if they are assessed to be likely to have significant environmental effects that have not already have been assessed during the preparation of the relevant strategic policies². The guidance goes on to state SEA is unlikely to be required where an SPD deals only with a small area at a local level, unless it is considered that there are likely to be significant environmental effects³.

2.4 In order to determine whether significant environment effects are likely, the local planning authority as “the responsible authority” need to take the criteria specified in Schedule 1 to the SEA Regulations⁴ into account (reflecting Annex II of the SEA Directive) and consult the relevant bodies.

2.5 The outcome of Camden’s SEA screening process and the relevant body responses are detailed further in this report.

Habitat Regulation Assessment (HRA)

2.6 HRA relates to the procedures that originally evolved in accordance with European Directive (92/43/EEC) (the HRA Directive) to assess the possible impacts of a plan or project on designated European Sites of international nature conservation importance, that are protected for the benefit of the habitats and species they support, before deciding whether to undertake, permit or authorise them.

2.7 The Directive was transposed into legislation by the Conservation of Habitats and Species Regulations 2017 (as amended) (the HRA Regulations). These have since been amended by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019, which became operable on 1st January 2021⁵.

2.8 The designated European Sites included Special Areas of Conservation (SAC) relating to habitats and Special Protection Areas (SPA) relating to birds. Although not covered by the HRA Regulations, Ramsar sites (which are designated wetland sites of international importance) have previously been treated in the same way as designated European Sites. Collectively these were known as internationally designated sites (and assessments also extend to potential new sites) and formed part of the EU’s “Natura 2000” ecological network.

2.9 As a result of the EU Exit Regulations amendments, SACs and SPAs in the UK no longer form part of the Natura 2000 network and the 2019 Regulations create what is now termed the “national site network”. For the purposes of HRA, these sites are referred to as “habitats sites” in the National Planning Policy Framework and defined as any site included within the definition at regulation 8 of the HRA Regulations. Ramsar sites do not form part of the national network, but still remain protected in the same way as SACs and SPAs.

2.10 Government guidance states that *“all plans and projects (including planning applications) which are not directly connected with, or necessary for, the conservation management of a habitat site, require consideration of whether the plan or project is likely to have significant effects on that site. This consideration – typically referred to as the ‘Habitats Regulations Assessment screening’ – should take into account the potential effects both of the plan/project itself and in combination with other plans or projects.”*

¹ The Town and Country Planning (Local Development) (England) (Amendment) Regulations 2009 removed the duty to produce a sustainability appraisal report for Local Development Documents other than Development Plan Documents

² [Strategic Environmental Assessment](#)

³ [Regulation 5\(6\) of the Environmental Assessment of Plans and Programmes Regulations 2004](#)

⁴ [Schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004](#)

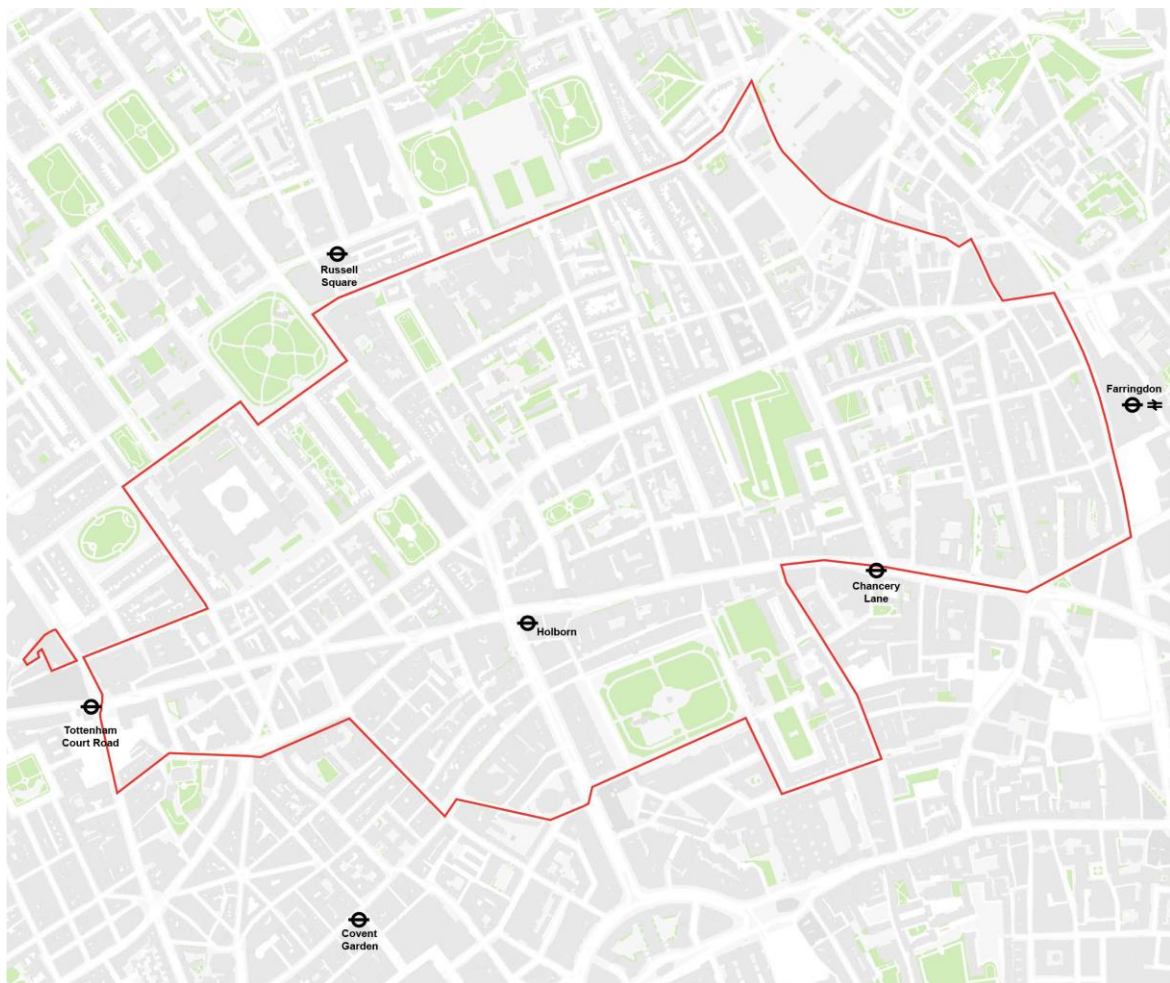
⁵ <https://www.gov.uk/government/publications/changes-to-the-habitats-regulations-2017/changes-to-the-habitats-regulations-2017>

- 2.11 The Council as “the competent authority” consulted Natural England for the purposes of this screening and must have regard to any representations that Natural England made and may agree to the plan or project only after ascertaining that it will not adversely affect the integrity of relevant habitats sites.
- 2.12 The outcome of Camden’s HRA screening process and Natural England response is detailed further in this report.

3.0 Purpose, priorities and objectives of the SPD

- 3.1 The NPPF defines SPDs as “documents which add further detail to the policies in the development plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan.”
- 3.2 The Holborn Vision area covers 120 hectares situated at the southern end of London Borough of Camden. It is within the Central Activities Zone (CAZ) and includes the Tottenham Court Road Growth Area and the Holborn Growth Area as designated in the current Local Plan (2017) and Site Allocations Plan (2013).

Map 1 – the boundary of the Holborn Vision SPD



- 3.3 The role of the Holborn Vision is to improve the Holborn area by guiding development and investment to enhance the experience of living, working, visiting and moving around Holborn. It responds to the changes that have taken place over the last 5 years which have impacted on

development in the area including the opening of the Elizabeth Line in 2022, changes in working behaviour, the need to respond to the impacts of climate change on Holborn's places and spaces.

3.4 The purpose of vision states that 'Holborn's varied and distinctive character will be celebrated and enhanced through its thriving commerce, flourishing neighbourhoods and residential communities. Its public realm will be transformed to create a connected, safer, greener and climate resilient environment for people who live, work and visit. This is supported by six objectives:

- HV1 - Mixed use
A genuinely mixed-use neighbourhood that brings together workers, residents, and visitors
- HV2 - Residential communities
A place where the existing residential communities are strengthened and enhanced so that residents can stay and thrive
- HV3 - Heritage
A place where the distinctive character areas of Holborn are celebrated and enriched
- HV4 - Public realm
A place connected by excellent public realm where everyone feels safe and encourages walking, cycling and relaxing
- HV5 - Business and commerce
A place of innovation that continues to foster a diversity of business and commerce where businesses of all sizes want to locate, stay, and grow
- HV6 - Sustainability and greening
A climate resilient place that is able to adapt and ready to face the future

3.5 Holborn is also an area of historic importance and of rich and varied character, defined by its townscape, land uses and communities. Given the diversity in both form and function, the Holborn Vision takes an approach that aims to balance competing needs by looking at seven different character areas within Holborn and indicating the priorities for each. These are:

1. Museum Quarter
2. Red Lion and Queen Squares
3. Great Queen Street
4. Lincoln's Inn and Gray's Inn
5. Hatton Garden
6. Tottenham Court Road Growth Area
7. High Holborn, Southampton Row/Kingsway

3.6 The SPD has been prepared to support and to be in compliance with Camden's adopted Local Plan policies and priorities. The Holborn Vision complies with Camden's adopted Local Plan (2017) which was subject to an SEA during its preparation. It does not allocate sites or set out policies for the development or use of land⁶

3.7 The Camden Plan (2017) includes priorities for the growth areas of Tottenham Court Road and Holborn. Tottenham Court Road is also identified in the [Mayor's London Plan](#)¹ as an Opportunity Area (OA). The Council will expect development in the growth areas to meet the objectives of the Local Plan and the identified priorities. It should maximise site opportunities and the opportunities and benefits for the borough and the local area, in particular in terms of jobs, homes and facilities for the community, within the context of the full range of Camden's planning policies as set out in this plan and the Council's other planning documents.

⁶ Transposed into Schedule 1 and 2 Development in The Town and Country Planning (Environmental Impact Assessment) Regulations 2017)

3.8 For the Tottenham Court Road Growth Area (TCROA), the priorities identified in the adopted Local Plan are:

- a balanced mix of uses, including housing and affordable housing, significant provision of offices and other employment opportunities, community facilities, and retail to support the Central London Frontages of Charing Cross Road, Tottenham Court Road and the western end of New Oxford Street;
- an excellent public realm, with an improved network of safe and attractive places and routes for pedestrians and cyclists, that successfully links to neighbouring areas (particularly the growth area at Holborn (see below), Covent Garden, Bloomsbury and Oxford Street) and reduces the dominance of traffic in the area, complementing the West End Project transport scheme;
- maximising densities compatible with local context, sustainable design principles and public transport capacity.
- development of the highest quality, as befits this historic area in the heart of London, which preserves local amenity and seeks to enhance and conserve the significance of heritage assets such as the character and appearance of conservation areas; and• remedying the lack of open space in the area through on-site provision or contributions to assist in the provision of new spaces

3.9 For the Holborn Growth Area the priorities identified in the adopted Local Plan are:

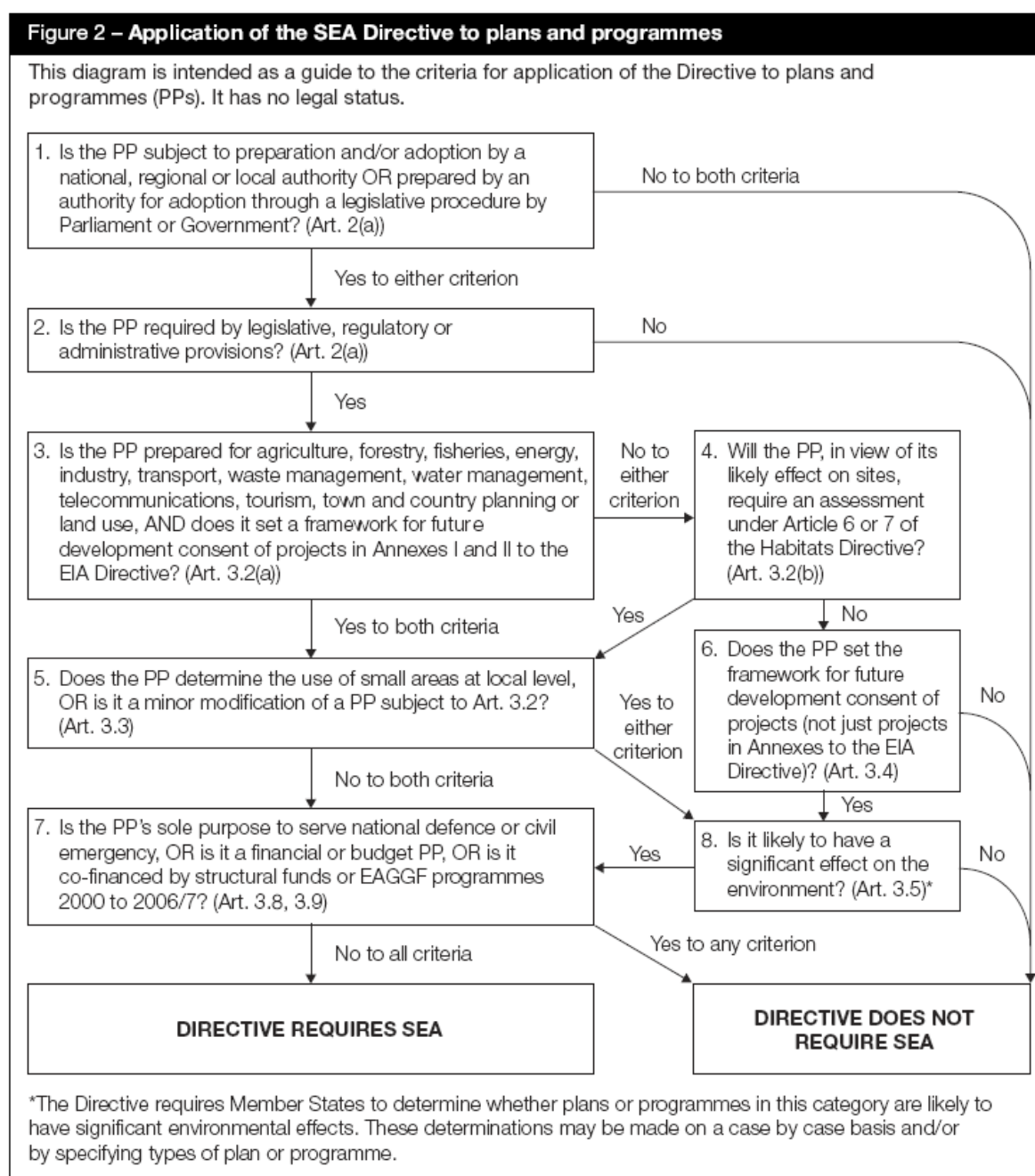
- provision of a mix of land uses, with offices and housing as the predominate uses; and
- provision of appropriate retail, food, drink and entertainment and service uses in the area's Central London Frontage in accordance with the supplementary planning document Camden Planning Guidance on town centres, taking the opportunities to introduce ground floor town centre uses where the continuity of the frontage is currently broken;
- development of a decentralised energy network;
- improvements to the street environment, in particular the pedestrian environment to and around Holborn Underground station;
- improved linkages and connections with the City of London, the Tottenham Court Road area and other neighbouring areas;
- making walking and 'wayfinding' easier;
- the provision of improved cycling facilities, particularly for visitors;
- working with partners including TfL to relieve congestion at Holborn Underground station, including the Holborn station capacity upgrade;
- appropriate contributions to open space, community facilities, regeneration initiatives and employment and training schemes;
- high quality, sustainable design that respects its surroundings and conserves and enhances the area's heritage assets and wider historic environment; and
- improving community safety, including opportunities for crime and anti-social behaviour.

3.10 The aim of the SPD is to supplement and build upon the priorities identified for the area in the adopted Local Plan and other plans and guidance. As an SPD, it cannot create new planning policies, allocate sites or set out policies for the development and use of land. However, it aims to provide the additional guidance needed to help ensure that emerging development is planned and designed in a coherent and integrated way and can deliver identified priorities, in particular a high-quality mixed-use environment and a more connected, accessible and climate resilient greener place that supports business and commerce whilst strengthening existing residential communities. In doing so, it complies with Development Plan policies and also strongly complies with the NPPF and its evolving emphasis on the importance of high-quality design.

4.0 Strategic Environmental Assessment screening

4.1 The “responsible authority” (in this case the London Borough of Camden) must determine whether a plan or programme, in this case the SPD, is likely to have significant environmental effects with reference to the criteria specified in Schedule 1 of the SEA Regulations.

4.2 Whilst there is no up to date guidance, a checklist guide to the application of the SEA Directive to plans and programmes from Government guidance (reproduced below)⁷ was used as a starting basis to help consider whether SEA is required, with further assessment in the tables below this checklist.



⁷ ODPM (2005) A Practical Guide to the Strategic Environmental Assessment Directive

Application of SEA Directive to Plans and Programmes (PP)		
1. Is the PP 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? (Art. 2(a))?	Yes-The SPD is being prepared and is planned to be adopted by the local authority	Go to Step 2
2. Is the PP required by legislative, regulatory or administrative provisions? (Art. 2(a))?	No - There is no statutory requirement to produce SPD. However, as it has been decided to produce the SPD, its preparation and adoption will be subject to relevant legislative, regulatory and administrative provisions and if adopted it will become a material consideration in decision-making.	Go to Step 3
3. Is the PP 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 in Annexes I and II to the EIA Directive? (Art. 3.2(a))?	No – The SPD is prepared for town and country planning purposes. However, whilst it identifies potential development sites in the area where future proposals may meet thresholds for which EIA may be required when they come forward, it does not allocate sites or set out policies for the development or use of land. It does not set a framework for future development consent of projects listed in Annexes I and II to the EIA Directive ⁸ .	Go to Step 4
4. Will the PP, in view of its likely effect on sites, require an assessment under Article 6 or 7 of the Habitats Directive? (Art. 3.2(b))	No - The draft SPD is supplementary to the adopted Local Plan, Site Allocations Plan and which have been subject of screening assessments under the Habitats Directive where no significant adverse effects have been identified. The SPD is subject of its own HRA screening assessment outlined in Section 5 of this report.	Go to Step 6
6. Does the PP set the framework for future development consent of projects (not just projects in Annexes to the EIA Directive)? (Art. 3.4)	No - The SPD does not allocate sites or set out policies for the development or use of land and does not set a framework for future development consent of projects (even those not listed in Annexes I and II to the EIA Directive).	This indicates the SPD does not require SEA
8. Is it likely to have a significant effect on the environment? (Art 3.5)	The answers above indicate that SEA is unlikely to be required for the SPD. However potential effects have been considered further and the SPD is	See table below: Determining the Likely Significance of

⁸ Transposed into Schedule 1 and 2 Development in The Town and Country Planning (Environmental Impact Assessment) Regulations 2017)

	subject of its own SEA screening assessment outlined below.	Effects on the Environment
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Criteria for determining likely significance of effects

- 4.3 The criteria for assessing the likely significance of effects in Annex II of the SEA Directive and Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations are set out in the table below, along with consideration of the potential impact of the SPD against each. This screening assessment has also taken into account that Sustainability Appraisal (incorporating SEA) has taken place on the adopted Camden Local Plan and Site Allocations document.
- 4.4 In the case of the former, the SA process (2016) highlighted that changes could be made to enhance the positive effects of the Plan and changes were incorporated. The SA also highlighted areas where there would be negative effects in relation to SA objectives and criteria and informed the inclusion of mitigation measures to eliminate or reduce the effects. In the case of the Site Allocations Plan, the SA process (2012) found that the plan delivered positive sustainability effects and that the allocated sites overall delivered positive outcomes in sustainability terms against the relevant sustainability objectives. The Inspector reports on both plans confirmed compliance with relevant legal requirements.

SEA Directive Criteria and Schedule 1 of Environmental Assessment of Plans and Programmes Regulations 2004	Comments	Likely Significant Effects?
Characteristics of plans and programmes, having regard, in particular to:		
1a) The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources	<p>The draft SPD, if adopted, would contribute to an existing framework of policies and guidance for future projects and activities in the area. It includes broad objectives and area-based guidance based on the adopted local plan but does not set a framework. It has regard to national policy and is in general conformity with the strategic policies of the borough. The SPD does not create new policies or allocate sites for particular development or uses or address issues outside of those already assessed in the Council's Local Plan and Site Allocations Document SA (incorporating SEA)</p> <p>The SPD does not allocate resources.</p>	No
1b) The degree to which the plan or programme influences other plans and programmes including those in a hierarchy	<p>Whilst a material consideration in decision-making, SPD sit at a lower level in the hierarchy of planning policy documents and are weighted accordingly.</p> <p>Providing supplementary guidance to support existing policies in the NPPF and the Development Plan (which includes the London Plan, Local Plan and Neighbourhood Plan) the SPD will have a limited influence on other plans and programmes at higher levels in the hierarchy and acts to provide more detail to some of the priorities and principles established in higher level plans, which have been subject to SA and SEA.</p> <p>The SPD provides a context and some area-based guidance which may be incorporated in an emerging Local Plan which is also undergoing SA. As it reflects the direction of the new Local plan, this is not considered to have significant effects in this regard.</p>	No
1c) The relevance of the plan or programme for the integration of	The SPD promotes sustainable development in accordance with the principles of the NPPF and	No

environmental considerations in particular with a view to promoting sustainable development	<p>Development Plan and seeks to make a positive contribution to the three dimensions of sustainable development (social, economic and environmental).</p> <p>In particular, the character area approach provides opportunities to create places and spaces in Holborn that are able to adapt to changing climate whilst ensuring high quality design approaches to the re-use and retrofitting of buildings can not only help to preserve the existing character of an area, but also contribute to achieving higher environmental standards</p>	
1d) Environmental problems relevant to the plan or programme	<p>The SPD is not considered to introduce or exacerbate any environmental problems. It has appropriately identified, and responded to, some of the environmental issues in the SPD area.</p> <p>Together with the Local Plan and other adopted plans and guidance, this SPD adds to a local policy context and guidance. It addresses local environmental problems and should positively assist in mitigating identified issues with an emphasis on more sustainable forms of development, improving the public realm and connectivity of the area and creating new areas of open and green spaces which are currently deficient. Overall, it should have beneficial effects.</p>	No
1e) The relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste-management or water protection).	<p>The SPD through its objectives and the encouragement of high quality and sustainable design will be indirectly relevant to the implementation of Community legislation on the environment. However, this will not be to any significant extent in the scope and nature of the localised positive outcomes envisaged, eg supporting improved air quality through promotion of walking/cycling, improved health and well-being through provision of green spaces/tree planting and climate mitigation measures.</p>	No
Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:		
2a) The probability, duration, frequency and reversibility of the effects	<p>The SPD guidance, objectives and principles are not considered to extend significantly beyond the policies which have already been subject to SEA and SA where no significant effects were identified. The phasing of development can be appropriately managed and mitigated through measures such as s106 agreements and Construction Management Plans.</p>	No
2b) The cumulative nature of the effects	<p>Cumulative effects occur where the outcome of one or more policies, when put together, have a significant combined effect. The draft SPD does not allocate sites for development nor does the guidance extend beyond supplementing the plans and policies which have already been subject to SEA and SA. It does however highlight the use of construction management plans to mitigate the impact of construction in the Vision area.</p>	No
2c) The trans-boundary nature of the effects	<p>There are not considered to be any significant trans-boundary effects arising from the SPD.</p>	No

2d) The risks to human health or the environment (e.g. due to accidents)	The SPD will not create significant risks to human health or the environment. Instead there are expected to be positive outcomes, eg through the creation of new green spaces and enhancement of green infrastructure, improved health and wellbeing through realigned transport priorities to encourage walking, cycling and use of public transport.	No
2e) The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)	The SPD guidance applies to a local area and the magnitude and spatial extent of potential effects will be limited. An Equalities Impact Assessment has been prepared to assess the community profile and the potential effects (negative and positive) of the SPD on the local population and the extent of effects are not considered sufficient to warrant SEA.	No
2f) The value and vulnerability of the area likely to be affected due to: i) special natural characteristics or cultural heritage ii) exceeded environmental quality standards or limit values iii) intensive land-use	Development Plan policies relating to land use, design, cultural heritage, amenity and environmental protection will apply alongside the principles and guidance in the SPD. The SPD highlights the character of the area and the need for appropriate and contextual design responses and includes a number of sustainability objectives to reflect adopted policies. The extent of effects are not considered sufficient to warrant SEA.	No
2g) The effects on areas or landscapes which have a recognised national, Community or international protection status	The SPD does consider potential effects on the character of the local area, however there are no areas or landscapes of national, Community or international protection status within the SPD area or in close proximity to be directly affected by the guidance in the SPD. The HRA screening opinions on other plans confirm this position (see HRA section below).	No

4.5 The guidance is intended to support the delivery of the high-quality design of buildings, streets, connections and public spaces and green infrastructure that can assist this and there should be positive local effects.

4.6 The draft SPD is in broad conformity with the policies of development plan documents that have undergone SA and SEA screening, which concluded they were unlikely to have significant environmental effects. The guidance contained in the lower-level SPD is considered to be similarly unlikely to give rise to significant environmental effects in accordance with the criteria considered.

5.0 Habitats Regulation Assessment context

- 5.1 The Habitats Regulations 2017 (as amended) transposed the land and marine aspects of the Habitats Directive (Council Directive 92/43/EEC) into English and Welsh law. The purpose of this Habitats Regulations Assessment (HRA) is to assess the impacts of a The Holborn Vision SPD against the conservation objectives of a European Site and to ascertain whether it would adversely affect the integrity of that site. In light of the regulations, below is an HRA screening assessment of the impact of the Holborn Vision SPD on designated European sites.
- 5.2 The Conservation of Habitats and Species Regulations 2010 is a set of regulations in the UK that aim to protect and conserve natural habitats and species of European importance. The purpose of these regulations is to implement the requirements of the European Union's Habitats Directive and Birds Directive in the UK. Under the regulations, public authorities are required to assess the impact of their plans and projects on protected habitats and species and take appropriate measures to avoid or mitigate any negative impact.
- 5.3 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".
- 5.4 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".
- 5.5 Through the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019, parts of the 2017 Regulations have been altered. Most of these changes involved transferring functions from the European Commission to appropriate authorities in England and Wales. The overall thrust of the 2017 Regulations is unchanged and protections for sites and species continue to apply.
- 5.6 The National Planning Practice Guidance (NPPG) on Strategic Environmental Assessment and Sustainability Appraisal states at paragraph 3 that: - 4 - "A plan or project may also require an appropriate assessment, as set out in the Conservation of Habitats and Species Regulations 2017 (as amended), if it is considered likely to have significant effects on a habitats site. A sustainability appraisal should take account of the findings of an appropriate assessment, if one is undertaken."
- 5.7 Department for Environment, Food and Rural Affairs (Defra) Guidance Habitats Regulations Assessments: Protecting a European site, 2021 (updated December 2023) sets out the requirement for undertaking an appropriate assessment of implications for European sites and European offshore marine sites. For Local Plans, the Local Planning Authority is required to undertake an HRA: "if the proposal might affect a European site. The effect of your proposal may depend on its location. It could be:
- on the site
 - near the site

- some distance away, for example by causing air, water or noise pollution or affecting a feeding area used by one of the site's designated species."

5.8 The following European sites are protected by the Habitats Regulations and any proposals that could affect them will require an HRA:

- Special Areas of Conservation (SACs)
- Special Protection Areas (SPAs).

5.9 Any proposals affecting the following sites would also require an HRA because these are protected by government policy:

- proposed SACs
- potential SPAs
- Ramsar sites - wetlands of international importance (both listed and proposed)
- areas secured as sites compensating for damage to a European site.

5.10 The legislation sets out a multi-stage process. An initial analysis (screening) is undertaken in order to determine whether there are likely to be 'significant effects.' This report forms this initial analysis.

5.11 It should be noted that The Camden Local Plan 2017 and the emerging new local plan (Reg 18) has undergone an HRA screening assessment. Both conclude that the local plan and draft local plan, 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. These have been taken into account in the assessment outlined below. The Holborn Vision does not make policy but complies with the adopted local plan. The HRA assessment has been carried out to confirm compliance with the relevant regulations.

6.0 The HRA

(1) 'Before you start an HRA

The first step for the competent authority is to decide whether the proposal is a project, a plan or neither. It is considered that the Holborn Vision meets the definition within the guidance in that it is 'A plan [which] sets out where future activities or developments should take place within a certain area. This can include any changes that are proposed to an existing plan.' The Holborn Vision sets out to guide development and investment to enhance the experience of living, working and visiting the Holborn Vision area.

(2) 'Check if a proposal might effect a European site'

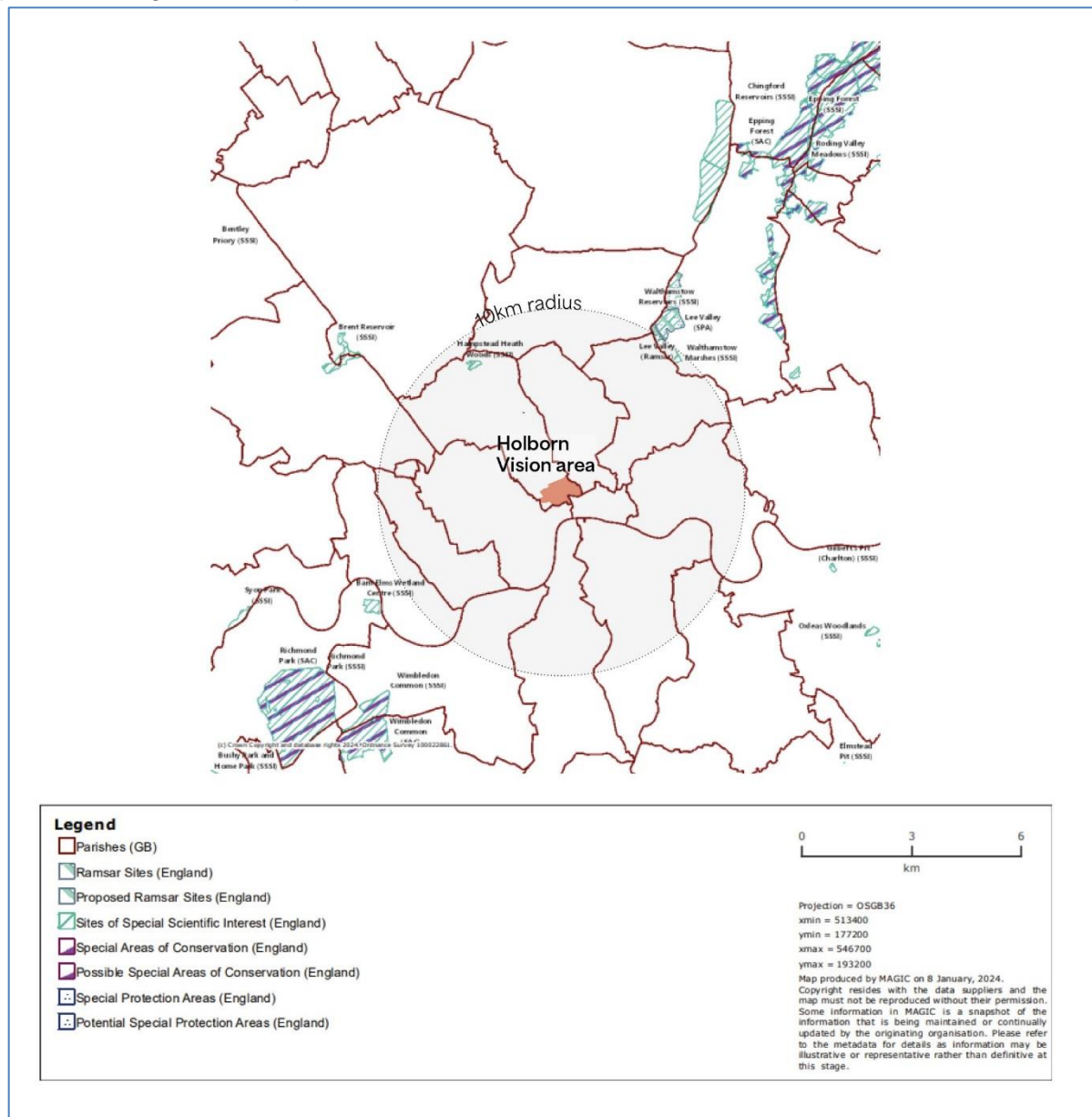
The HRA guidance suggests that location is the primary determinant of whether an effect is likely or not. It cautions that there may be effects on European sites "some distance away," for example due to air, noise or water pollution.

For the purposes of this screening assessment, sites within approximately 10km radius of the borough are considered. This distance being considered to be the maximum over which measurable effects could occur. Natural England's 'Magic map' shows the location of designated European sites (and potential sites). As can be seen in the map below, there are no European sites within the administrative boundary of the London Borough of Camden. The following sites are within 10km of the Holborn Vision area.

- Lee Valley SPA and Ramsar

- Hampsted Heath Woods SSSI:

Map of the Designated European sites with 10km of the Holborn Vision Area



(3) Who to consult when carrying out an HRA

The HRA guidance states that the competent authority must consult with Natural England following the screening assessment, 'appropriate assessment' but can ask for advice at any stage in the process.

Natural England was consulted at the draft stage of the Holborn Vision in 2024 and provided the following response:

'While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.'

This draft revised Screening Opinion will be shared with Natural England and their comments will be included in the final version.

(4) The guidance states that where a plan could affect a European site, the competent authority needs to:

- Understand the conservation objectives for the sites
- Consider existing threats and pressures (by reference to existing databases)
- Consider possible combined effects on the site with other plans
- Give clear reasons and evidence for decisions LB Camden - 7 –
- Make sure the assessment is thorough and complete with clear and precise conclusions.

(5) HRA Stages

The HRA guidance sets out 3 main stages (not all will necessarily be required):

- (i) Screening – to check if the plan is likely to have a significant effect on the site(s) conservation objectives. If not, the following stages are not required.
- (ii) Appropriate assessment – assess likely significant effects of the plan in more detail and identify ways to avoid or minimise any effects
- (iii) Derogation – consider if proposals that would have an adverse effect on an European site qualify for an exemption.

The SPD is in broad conformity with the policies of development plan documents that have undergone HRA screening, which concluded they were unlikely to have significant effects on relevant sites of importance for habitats or species, or an adverse impact on the integrity of those sites. The guidance contained in the lower-level SPD is therefore similarly unlikely to have significant effects or an adverse impact on the integrity of those sites.

This does not mean other locally designated sites of nature conservation interest may not be affected by proposals and this will need relevant ecological assessments. As development proposals come forward, they will be required to assess the impacts on the local area, landscapes and ecological context and the draft SPD highlights that there are locally designated sites of importance for nature conservation (SINCs) For information, within the Holborn Vision area the designated SINC is Lincoln's Inn Fields which is highlighted in the guidance.

7.0 SEA and HRA Screening Conclusions

7.1 The Council considered the scope and content of the draft SPD for the purposes of determining whether the guidance is likely to give rise to any significant environmental effects or is likely to have significant effects on designated national network or Ramsar sites of importance for habitats or species, or an adverse impact on the integrity of those sites.

7.2 In making its assessments, the Council has had regard to the respective SA and SEA/HRA screening opinions that have been previously undertaken on higher level development plan documents. The Council determined through this SEA screening assessment that the SPD is unlikely to give rise to significant environmental effects.

7.3 The Council determined through this HRA screening assessment that the SPD is unlikely to have significant effects on sites of importance for habitats or species (previously Natura 2000 sites), or an adverse impact on the integrity of those sites.

7.4 This assessment and conclusions will not negate the need to consider whether further assessments, such as an Environmental Impact Assessment, will be required for specific development proposals and related planning applications in the area covered by the SPD.

8.0 Consultation with relevant bodies

8.1 In accordance with the respective regulations the Council consulted the statutory consultation bodies on the draft Holborn Vision SPD

- Environment Agency
- Historic England
- Natural England (in respect of both SEA and HRA screening)

8.2 In respect of the SEA and HRA assessments we received the following responses:

- **Environment Agency**

No comment

- **Historic England comment**

No comment on the SEA screening assessment

- **Natural England comment**

An SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project.

9.0 Conclusion

9.1 The outcome of this screening confirms that neither SEA nor HRA are required, and in accordance with regulations, this report will be published on the Council's website to demonstrate that SEA and HRA issues have been taken into account and considered during the preparation of the SPD.