



Waltham Forest Local Plan Proposed Submission Habitats Regulations Assessment Report






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Executive Summary

Background

This report presents the findings of Habitats Regulations Assessment (HRA) of the London Borough of Waltham Forest (LBWF) Local Plan (Part 1). The Local Plan (Part 1) shapes and manages growth, development and regeneration across the Borough for the next 15 years. It aims to promote the sustainable growth of Waltham Forest and sets out how the Borough will meet the challenges of economic, environmental and social sustainability. 27,000 additional homes and 52,000 sqm employment purposes are planned for, as well as supporting physical, social and green infrastructure provision commensurate with the scale of growth.

The purpose of an HRA is to assess the significance of potential impacts of a plan on relevant European sites. Natural England has confirmed that the three European sites which need to be considered in this HRA are:

- Epping Forest Special Area of Conservation (SAC);
- Lee Valley Specially Protected Area (SPA) and the Lee Valley Ramsar site; and
- Wormley-Hoddesdonpark Woods SAC.

If Likely Significant Effects (LSEs) on European sites are identified in screening, measures must be put in place to avoid them. Further investigation may be necessary to understand how the plan might affect the integrity of European sites.

The Draft Local Plan (Part 1) was consulted on between July and September 2019 as a part of the Regulation 18 Preferred Options consultation. An HRA of the Regulation 18 Draft Local Plan was undertaken at the beginning of 2020 and reported to Natural England in draft HRA Report (April 2020). The Local Plan has since been amended following Regulation 18 consultation and the Proposed Submission Local Plan is currently being consulted on from 00:00 on Monday 26th October to 23:59 on Monday 14th December.

The screening of the Draft Local Plan (Part 1) in August 2019 identified a number of LSEs which require further investigation in HRA Task 2 i.e. Appropriate Assessment (AA). No LSE was identified on the Wormley-Hoddesdonpark Woods SAC. The Proposed Submission Local Plan has been rescreened in September 2020. No new LSEs have been identified in the rescreening exercise. This HRA Report has been updated to reflect the updated screening and changes to policies since the Regulation 18 Draft Local Plan was screened and assessed. It has also been updated to reflect how the mitigation measures put forward in the draft HRA Report (April 2020) have been incorporated into the Proposed Submission Local Plan policies.

The AA has considered the following potential effects:

- Recreational pressure;
- Water pollution;
- Water demand



- Air pollution; and
- Urbanisation.

Findings of the AA

Epping Forest Special Area of Conservation (SAC)

Water demand and water pollution: The AA of the Local Plan has been able to conclude that the Draft Local Plan will not result in adverse effects on the Epping Forest Special Area of Conservation (SAC) site in relation to water demand and water pollution, both alone and in combination with growth in neighbouring areas. Following rescreening of the Proposed Submission Local Plan Part 1 policies, this conclusion has not changed.

Recreational pressures: Potential adverse effects in relation to recreational pressures on the Epping Forest SAC were identified at the draft plan stage. Visitor surveys of Epping Forest have found that the entire borough falls within the 'Recreational Zone of Influence'. The Local Plan (Part 1) would result in new homes within the Zone of Influence which is predicted to have an adverse effect on the integrity of the SAC due to increased recreational pressures.

Natural England has produced an interim advice note on the Emerging Strategic Mitigation Strategy for the Epping Forest SAC. Policy wording was proposed within the AA to ensure that an appropriate mitigation strategy is produced prior to the Local Plan being adopted. Natural England were consulted on the proposed mitigation and were in agreement. The wording has been incorporated into the Proposed Submission Local Plan Part Policy 83 The Epping Forest and the Epping Forest Special Area of Conservation. In addition, a separate Supplementary Planning Document (SPD) is being prepared which will ensure that Suitable Alternative Natural Greenspace (SANGS) will be delivered alongside housing development in order to mitigate for increased recreational pressures on Epping Forest SAC.

This part of the AA can conclude that the Local Plan (Part 1) will have no adverse effects on the integrity of Epping Forest SAC with regards to recreational pressure arising from the Waltham Forest Local Plan policies. However, Epping Forest District Council's Local Plan was not found to be sound during Examination in 2019 and they are in the process of providing further information on how they will offset the adverse effects of recreational pressures on the SAC. Until this further information is agreed, it is not currently possible to conclude no adverse effects from recreational pressures resulting from the Waltham Forest Local Plan (Part 1) when assessed in combination with the Epping Forest District Council Local Plan.



Urban effects: Potential adverse effects in relation to urban effects on the Epping Forest SAC were also identified as a result of the Local Plan (Part 1). Urban effects include fires, fly-tipping and litter.

Policy wording was proposed at the draft plan stage to ensure the Local Plan contains a mechanism to protect the SAC from urban effects once further project details are known. This wording has now been included within Policy 83 The Epping Forest and the Epping Forest Special Area of Conservation. This part of the AA can conclude that the Local Plan (Part 1) will have no adverse effects on the integrity of Epping Forest SAC as a result of urban effects arising from the Waltham Forest Local Plan policies. However, Epping Forest District Council are undertaking further investigation on the effects of urbanisation as their Plan was found to be unsound during examination. Until Epping Forest District Council provides this further information on urbanisation, it is not currently possible to conclude no adverse effects from the Local Plan when assessed in combination with Epping Forest District Council Local Plan.

Air pollution: It has not been possible to complete an assessment of whether there will be a potential effect on the Epping Forest SAC from air pollution at the draft plan stage because traffic data was required from Transport for London (TfL). In order to conclude the air pollution part of the AA, traffic data has been obtained from Transport for London (TfL). The data is in GIS format and has required some specialist analysis by transport consultants. The analysis of the data has shown that there are a number of roads with Waltham Forest which pass within 200m of Epping Forest SAC on which traffic is predicted to increase by over 1000 Annual Average Daily Traffic (AADT) over the plan period. Following an accepted methodology within the Design Manual for Roads and Bridges¹, these predicted traffic increases are considered 'significant' and a further study is required in order to assess whether air quality impacts, and therefore impacts on the habitats of Epping Forest, could be caused by the predicted traffic increases. The anticipated increase in electric vehicles, downward trends in car ownership and the proposed policies within the Local Plan Part 1 (which will limit car parking in new developments) will be taken into consideration in reaching conclusions of the HRA.

The air quality study is underway and will be concluded in November 2020. Once the air quality study is completed, the air pollution part of the AA will be concluded in November 2020. An addendum to the HRA Report will be produced in November 2020 and will be available for consultation prior to the end of the Regulation 19 consultation on Monday 14th December 2020.

Lee Valley Specially Protected Area (SPA) and the Lee Valley Ramsar site

Water demand and water pollution: The AA has been able to conclude that the Draft Local Plan (Part 1) will not result in adverse effects on the Lee Valley SPA and the Lee Valley Ramsar site

¹ <https://www.standardsforhighways.co.uk/dmrb/>



in relation to water demand and water pollution, both alone and in combination with growth in neighbouring areas. Following rescreening of the Proposed Submission Local Plan Part 1 policies, this conclusion has not changed.

Recreational pressures: The AA of the Draft Local Plan (Part 1) was also able to conclude that there will be no adverse effects on the Lee Valley SPA and Ramsar site in relation to recreational pressures alone and in combination. Following rescreening of the Proposed Submission Local Plan Part 1 policies, this conclusion has not changed.

Urban effects: Potential adverse effects in relation to urban effects on the Lee Valley SPA and Ramsar site were identified at the draft plan stage. Policy wording was proposed within the AA to ensure the Local Plan (Part 1) contains a mechanism to protect this SPA and Ramsar site from urban effects once further project details are known. The proposed policy wording has now been incorporated into Proposed Submission Local Plan Part 1 Policy 84 the Lee Valley Regional Park. This part of the AA can conclude that the Local Plan (Part 1) will have no adverse effects on the integrity of the Lee Valley SPA and Ramsar site, both alone and in combination with growth in neighbouring areas.

Air pollution: The AA of the Draft Local Plan Part 1 has been able to conclude that there will be no adverse effects on the Lee Valley SPA and Ramsar site in relation to changes in air quality alone and in combination. Following rescreening of the Proposed Submission Local Plan Part 1 policies, this conclusion has not changed.

Throughout the HRA, regular communications have taken place between the HRA consultants and Natural England's representation for Waltham Forest. Natural England were happy with the conclusions of the HRA of the Draft Local Plan and approved the mitigation put forward earlier in 2020 following assessment of the Draft Local Plan (Regulation 18).

The air quality part of the HRA is due to be completed in November 2020 at which point an addendum to this HRA Report will be issued for consultation.

The HRA conclusions in relation to potential in combination effects will also be updated when further information is available on the Epping Forest District Council Local Plan in relation to the potential urbanisation and recreational pressure effects that plan is predicted to have on Epping Forest SAC.

1 Introduction

ClearLead Consulting has been instructed to undertake a Habitats Regulations Assessment (HRA) of the new Waltham Forest Local Plan (Part 1). This report is the HRA Report which considers the potential affects of the Proposed Submission Local Plan (Part 1) October 2020.

1.1 Habitats Regulations Assessment

In the UK, the Habitats Directive (92/43/EEC) has been transposed into domestic legislation as the Habitats and Species Regulations 2017 which requires an assessment of any plans which are likely to have a significant effect on any protected European sites, i.e. Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar wetland sites. This is commonly referred to as a Habitats Regulations Assessment (HRA). This requirement includes strategic plans with an impact on land use.

The purpose of an HRA is to assess the significance of potential impacts of a plan on relevant European sites. The assessment should determine whether the plan would adversely affect the integrity of the site in terms of its nature conservation objectives. Where negative effects are identified, other options should be examined to avoid any potential for damaging effects.

HRA findings feed into the parallel Sustainability Appraisal (SA) which incorporates Strategic Environment Assessment, an integral part of the plan preparation process.

1.2 Background

The London Borough of Waltham Forest (LBWF) Council are in the process of preparing a new Local Plan to guide development in the Borough. The Local Plan (Part 1), when adopted, will replace the currently adopted Core Strategy for the London Borough of Waltham Forest and will plan for development between 2020 and 2035.

The Council has aspirations for growth, including significant new housing and sustained economic growth, to provide jobs for local people and increase the supply of housing, including affordable units.

LBWF are also preparing a Site Allocations Document which will form the second part of the Local Plan. It will allocate additional sites for development to assist in meeting the overall development requirements of the Local Plan (Part 1). In particular, it will identify strategic sites for future development in the Borough. The first draft of the Site Allocations Document is



currently out for consultation until 10 December 2020 and can be accessed here:

<https://www.walthamforest.gov.uk/content/consultation-local-plan-part-2-site-allocations>

An HRA of the Site Allocations Document can also be access via this link.

LBWF Council consulted on a Local Plan 'Direction of Travel' document in November – December 2017. The Direction of Travel document was the first stage in the engagement process with residents, businesses and other stakeholders on what the new Local Plan should contain. It presented the challenges and opportunities for the Borough and a Vision for Waltham Forest, looking ahead to what the Borough will be like in 15 to 20 years' time. The Direction of Travel document presented options for consultation, comprising six spatial strategy options for development in the Borough. These options were subject to HRA screening as well as Sustainability Appraisal (SA). The HRA screening of options identified potential significant effects in relation to all of the spatial strategy options.

Between July and September 2019, the Council consulted on a Draft Local Plan (Part 1). The Draft Local Plan (Part 1) was subject to HRA screening and Appropriate Assessment (AA) earlier in 2020. That version of the Local Plan (Part 1) has since been amended following the consultation to form a Proposed Submission Local Plan (Part 1). The Proposed Submission Local Plan has been rescreened in September 2020. This HRA Report has been updated to reflect the updated screening and changes to policies since the Regulation 18 Draft Local Plan was screened and assessed. It has also been updated to reflect how the mitigation measures put forward in the draft HRA Report (April 2020) have been incorporated into the Proposed Submission Local Plan policies.

2 The Waltham Forest Local Plan Part 1

2.1 Background to the new Waltham Forest Local Plan

Once adopted, the new Local Plan (Part 1) will form the development plan for Waltham Forest along with:

- The Site Allocations Document (Local Plan Part 2) – currently under preparation;
- The London Plan – (a new version of which is currently under preparation); and
- North London Waste Plan – sets out in partnership with other London boroughs the planning framework for waste management.

2.1 Description of the Plan

The Local Plan (Part 1) (2020-2035) will shape developments and guide neighbourhood plans, regeneration and decisions on the location, amount and types of development the Borough requires to meet local needs and accommodate sustainable growth. It aims to promote the sustainable growth of Waltham Forest. The Local Plan (Part 1) will not allocate development sites.

The Local Plan Part 2 Site Allocations Document will allocate sites for development to assist in meeting the overall development requirements of Part 1 of Local Plan. In particular, it will:

- Identify strategic sites for future development in the Borough. Typically, these will be key sites acting as catalysts for development in strategic locations and elsewhere in the borough;
- Identify sites associated with the delivery of essential infrastructure to support growth;
- Identify sites/areas where radical changes from existing land use e.g. where it is proposed to release Metropolitan Open Land (MOL) for development, or to redevelop employment land for housing or alternative uses, or sites to be safeguarded from other development will be required to implement strategic policies of the plan.

The site allocations document is intended to help translate the strategic policies to sites and to be a better tool of communication both with communities, potential developers and other interests. A typical allocation will include: the site location, size and ownership details of how the site was identified and previous planning applications, suggested uses for the site in the future design considerations and other key planning constraints, and estimated future timescales for delivery or development.



Once adopted, the new Local Plan Parts 1 and 2 will replace the Core Strategy (2012), Development Management Policies Document (2013), Walthamstow Town Centre Area Action Plan (2014) and Blackhorse Lane Area Action Plan (2015), with a single Local Plan, supported by a series of Supplementary Planning Documents, Neighbourhood Plans (as may be prepared) masterplans, and planning briefs.

2.2 Overview of the Plan Area

Waltham Forest is an outer London Borough in the North East of London and is one of the greenest Boroughs in London. The Local Plan area is shown in Figure 2.1 below.

The North Circular Road (A406) divides the Borough into two main areas. The London Borough of Waltham Forest was created in 1965 by the amalgamation of the Essex boroughs of Chingford, Walthamstow and Leyton. The Borough is predominantly residential with retail centres, areas of industry and a total of 1205ha of open space, parks and playing fields. The Green Belt in the borough is part of the Metropolitan Green Belt which surrounds London.

The southern parts of the Borough comprise Leyton, Leytonstone and Walthamstow and the northern parts comprise Chingford and Highams Park.

The Lee Valley SPA and RAMSAR site (and Regional Park) and Epping Forest SAC define its western and eastern boundaries and it sits alongside the Olympic Park and the Stratford City development. As an area it provides a link between two major regeneration areas: The Thames Gateway and the London – Stansted – Cambridge – Peterborough corridor.

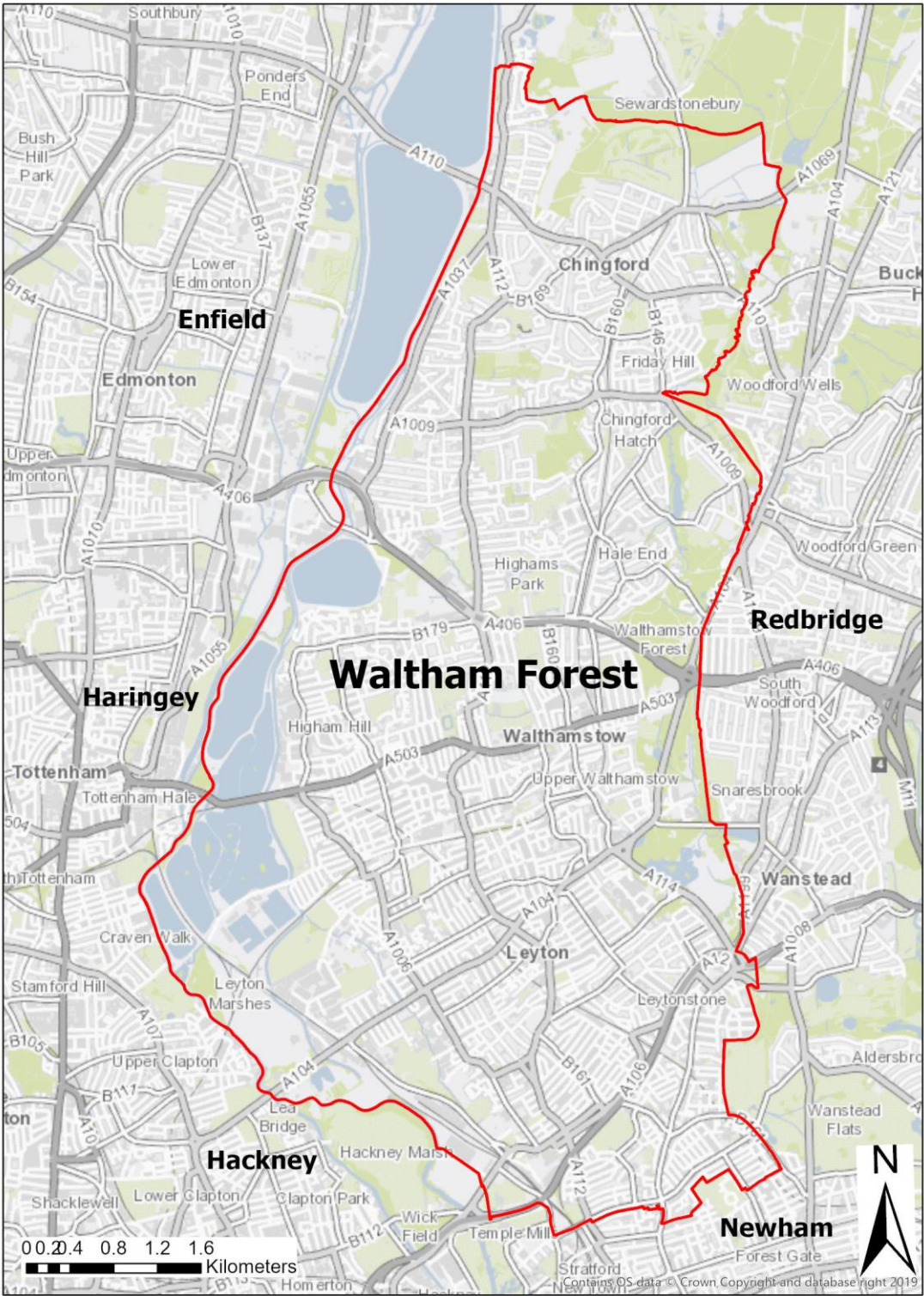


Figure 2.1: Waltham Forest Local Plan Boundary

2.3 Content of the Local Plan (Part 1)

The Proposed Submission Local Plan (Part 1) contains an overarching spatial strategy for the borough which consists of the following eight policies plus a Key Diagram:

- Policy 1 - Presumption in Favour of Sustainable Development;
- Policy 2 - Scale of Growth;
- Policy 3 - Infrastructure for Growth;
- Policy 4 - Location of Growth;
- Policy 5 - Management of Growth;
- Policy 6 - Ensuring Good Growth;
- Policy 7 - Encouraging Mixed Use Development; and
- Policy 8 - Character-led Intensification.

The policies plan for net increases in homes and employment uses over the plan period 2020-2035. 27,000 additional homes² and 52,000 sqm employment purposes are planned for as well as supporting physical, social and green infrastructure provision commensurate with the scale of growth. Policy 3 states that *“The Council will require development proposals to make viable provision for infrastructure that is necessary to accommodate additional demands arising from growth”*.

Policy 4 focuses new development, regeneration and investment activities in Strategic Locations and other Site Opportunity Locations (see Key Diagram in Figure 2.2). These will be the primary locations for growth involving new homes and jobs with supporting infrastructure. The division of the borough into three sections is shown in Figure 2.2. The spatial strategy for each of the three areas is as follows:

- South Waltham Forest: A minimum of 14,900 new homes and 3,250 new jobs in the strategic locations of Lea Bridge, Low Hall, Church Road, Leyton, South Leytonstone, Leytonstone District Centre, Whipps Cross and Bakers Arms.
- Central Waltham Forest: 6,300 homes and 1,600 jobs in the strategic locations of Blackhorse Lane, Walthamstow Town Centre, Forest Road Corridor and Wood Street District Centre.
- North Waltham Forest: 2,000 homes and 1,940 jobs in the strategic locations of North Chingford District Centre, Sewardstone Road Neighbourhood Centre, South Chingford District Centre, Highams Park District Centre and the North Circular Corridor.

In addition, 3,800 homes will be delivered outside the identified Strategic Locations.

² The Covid-19 pandemic could affect baseline data and population projections, but this will only be known when data sources are next published. This figure will be updated when information is available.



Policy 5 Management of Growth states that *“In planning for growth, the Council will seek to achieve an appropriate balance between physical, social and economic development and environmental protection”*. Policy 5 also includes protecting designated sites and areas (Green Belt, Metropolitan Open Land, Special Protection Areas, Ramsar Sites, Conservation Areas, and Listed Buildings). Finally, the policy also aims to make effective use of previously developed land, except where land is of high environmental value or purposely safeguarded or protected for particular uses as identified on the Policies Map. Proposals including the redevelopment of underused and vacant land, in particular, sites listed on the Brownfield Land Register, will be prioritised.

Policy 6 is a protection policy which includes a requirement to protect and enhance existing green and blue infrastructure, including open space and leisure facilities, biodiversity and nature conservation.

Policy 7 encourages mixed-use development to be brought forward within the borough particularly in the Strategic Locations and Policy 8 supports opportunities for intensification of development involving housing and employment uses in the borough and sets out three different approaches.

The Local Plan (Part 1) also contains a range of thematic policies presented over twelve chapters which address housing delivery, economy, culture, health, community infrastructure, climate change and environment etc. Three of the thematic policies (81, 83 and 84) provide specific protection for biodiversity within the borough and the Lee Valley Regional Park and Epping Forest as shown in Boxes 2.1 to 2.3.

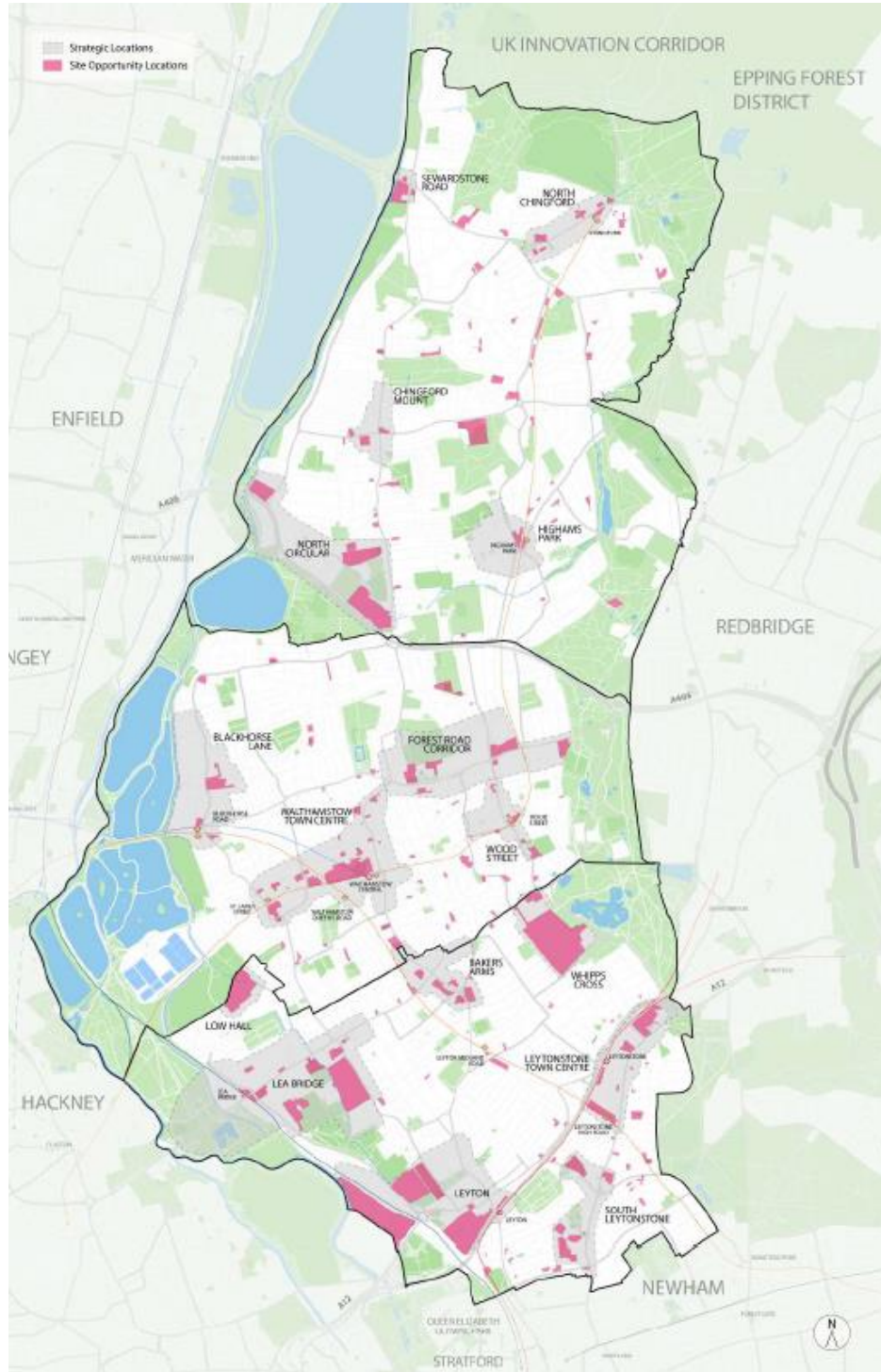


Figure 2.2: Waltham Forest Local Plan (Part 1) Key Diagram

Box 2.4: Local Plan (Part 1) Policy 81 Biodiversity and Geodiversity

Proposals should seek to protect and enhance biodiversity and geodiversity resources in the borough and will ensure that:

- A. All development should maximise opportunities to create new or make improvements to existing natural environments, nature conservation areas, habitats or biodiversity features and link in to the wider green infrastructure network
- B. All major development proposals are required to include a biodiversity survey of the site
- C. Where there are existing biodiversity resources either on-site or in the vicinity of a development site, the developer must provide measures for their retention, the integration of existing wildlife habitats and features, and their restoration and enhancement where appropriate. Where retention, restoration or enhancement measures are not considered possible, mitigation and compensation measures which promote the principle of net gain in line with NPPF para 174 should be clearly set out with supporting evidence for their effectiveness and relevance in relation to supporting the specific biodiversity value of the borough and its key international sites
- D. Where opportunities arise, development proposals should seek to provide measures to support species and habitats through the use of landscaping on or adjacent to buildings. This may involve the inclusion of living roofs and walls or other measures which provide space for species to nest, roost or hibernate.)
- E. Where vacant or derelict land is awaiting redevelopment and has some value for nature conservation, the Council will expect it to be protected on a temporary basis.
- F. Development proposals will be expected to improve sensitive public access to areas of nature conservation, especially in areas of deficiency.
- G. An arboricultural report must be submitted at the planning application stage where a development proposal will impact on trees. (See Policy 82)
- H. Development proposals should protect and enhance the nature conservation or geological interest of nationally important wildlife sites as shown on the Policies Map. Development proposals will not normally be granted planning permission where they pose adverse direct or indirect effects on any land or area within the identified Sites of Special Scientific Interest (SSSI), Sites of Importance to Nature Conservation (SINC), Special Areas of Conservation (SAC), Ramsar sites, or Special Protection Areas (SPA).
- I. Development on or nearby to Walthamstow Reservoirs Special Protection Area, Walthamstow Wetlands and Walthamstow Marshes Sites of Special Scientific Interest must not have a detrimental impact on the biodiversity or nature conservation value of the site. Development may only be permitted where appropriate mitigation or compensatory measures are put in place.

Box 2.4: Local Plan (Part 1) Policy 81 Biodiversity and Geodiversity (continued)

J. Development proposals which would cause harm to a designated site with geodiversity value will not be permitted unless any damaging impacts can be prevented by appropriate mitigation measures.

K. Development proposals which would affect a designated site with geodiversity value should seek to retain, restore and enhance the geological interest where possible.

Box 2.5: Local Plan (Part 1) Policy 83 The Epping Forest and the Epping Forest Special Area of Conservation

The Council will protect and enhance the natural environment of the Epping Forest and its Special Area of Conservation (SAC) and seek to ensure that development proposals contribute to the mitigation of adverse recreational and air quality effects on the SAC by ensuring:

A. All new development within (6km) of the boundary of the Epping Forest SAC (see Map) likely to have a significant effect on the integrity of the Epping Forest Special Area of Conservation (SAC), either alone or in combination with other plans or projects, will be required to demonstrate that adequate measures are put in place to avoid or mitigate any potential adverse effects through contribution to the mitigation of recreational and air quality impacts on the Epping Forest SAC as follows:

- i. Developments of 1-10 residential units will be expected to provide measures to ensure that the development provides maximum ecological benefit on the site in line with the requirements of Policy 86
- ii. Developments of 10 – 99 units will be required to contribute to SAMMs (Strategic Access Monitoring and Management Strategy) in addition to the above and in line with the mitigation measures agreed with the Conservators of Epping Forest and partner local authorities. These will be set out in the Council's Mitigating the Impact of Development on SAC/SPA SPD.
- iii. Developments of 100+_ units within the borough will be required to contribute to the mitigation of development impacts on the SAC via the provision of SANGS (Suitable Alternative Natural Green Space) as set out in the Council's Mitigating the Impact of Development on SAC/SPA SPD.

B. Development proposals affecting Epping Forest should be sensitive and proportionate, delivering enhancements where possible and must not contribute to adverse impacts on ecological integrity, amenity or visitor enjoyment.

C. Planning applications for development and allocations within 500m of the Epping Forest SAC must demonstrate through project level HRA that the development will not generate adverse urban effects on the integrity of the SAC.

Box 2.6: Local Plan (Part 1) Policy 84 The Lee Valley Regional Park

Proposals which affect the Lee Valley Regional Park will ensure that:

- A. Development proposals include measures for the protection, enhancement and where possible, the extension of the borough's network of Green Corridors.
- B. Development proposals affecting the Lee Valley Regional Park should be sensitive and proportionate, delivering enhancements where possible and must not contribute to adverse impacts on ecological integrity, amenity or visitor enjoyment.
- C. Development proposals in proximity to the Lee Valley Regional Park should improve access and links to the park and its waterways.
- D. Development proposals affecting the Lee Valley Regional Park must not contribute to adverse impacts on amenity, ecological integrity or visitor enjoyment; and will be expected to deliver enhancements where possible. The Council supports the Lee Valley Regional Park Authority's Park Development Framework. The contents of the Lee Valley Park Development Framework as adopted is a material consideration in the determination of planning applications.
- E. Development that affects the Lee Valley Special Protection Area will contribute to the mitigation of adverse effects on the Special Protection Area (SPA).
- F. Planning applications for development at Blackhorse Lane will need to be accompanied by a project level HRA to ensure the development will not generate adverse urban effects on the integrity of the Lee Valley SPA and Ramsar.

2.4 HRA of the Local Plan Part 2

The Local Plan Part 2 Site Allocations Document has been subject to HRA during August / September 2020. LSEs were identified in relation to all proposed site allocations. LSEs were identified in relation to recreational pressure, air quality and urban effects on Epping Forest SAC.

The AA was able to conclude that the Site Allocations Document will not result in adverse effects on the integrity of the Lee Valley SPA and Lee Valley Ramsar site in relation to changes in air quality, recreational pressures and urban effects alone and in combination.

Mitigation measures have been put forward in addition to those put forward in the HRA of the Draft Local Plan (Part 1) for project level HRA of allocation sites within close proximity of European sites.

It was not possible to assess whether there will be a potential effect on the Epping Forest SAC from air pollution relating from the Site Allocations Document because information is required from the AA of the Local Plan Part 1 and the ongoing air quality study in order to inform that assessment. At this stage as an air quality assessment is currently underway which will inform the next stage of the HRA.



It has also not been possible to conclude no adverse effects on Epping Forest SAC will result from the Site Allocations Document as yet in combination with the Epping Forest District Council (EFDC) Local Plan. Epping Forest District Council's Local Plan was found by the Inspector during examination to not currently be sound and requires major modifications before it can be adopted. These modifications include provision of further information in relation to the effects of urbanisation and recreational pressures on the Epping Forest SAC (to be completed in late 2020). The recommended mitigation measures within the Site Allocations Document HRA Report (October 2020) and policy included within the Local Plan (Part 1) would ensure that the same issues are not encountered within the Waltham Forest Local Plan (Part 1) as they give assurance that approved mitigation strategies would be completed prior to Plan adoption. However, until EFDC provides further information on these effects it is not possible to conclude that part of the HRA of the Site Allocations Document. This is also the case for the AA of the Local Plan (Part 1) as discussed in Section 5 of this report.

3 Methodology

Figure 3.1 sets out the HRA process.

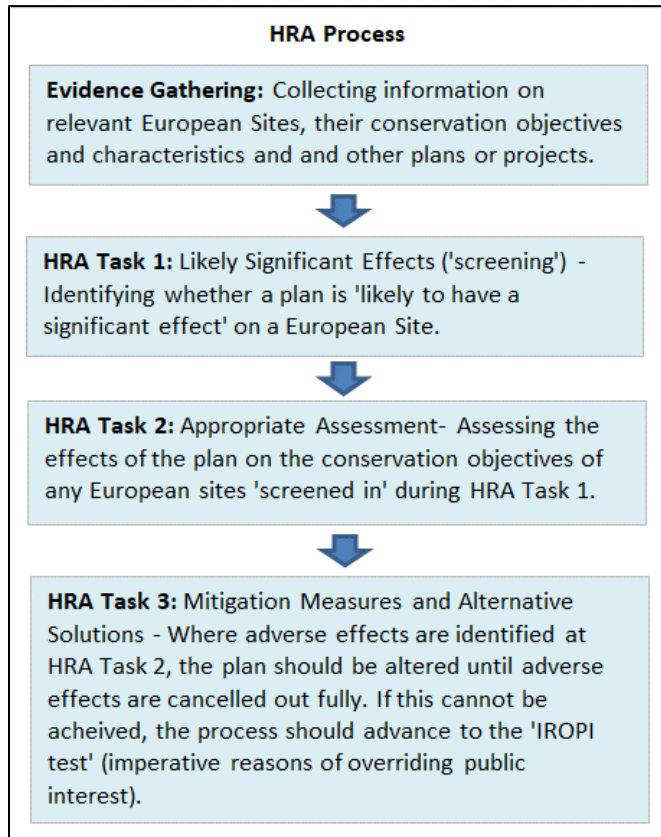


Figure 3.1 The HRA Process

During screening, the 'Precautionary Principle' needs to be applied: if an effect cannot be ruled out based on objective information it has been reported as "likely" or not possible to rule out. Furthermore, a judgement³ by the Court of Justice of the European Union (People Over Wind) ruled that Article 6(3) of the Habitats Directive⁴ must be interpreted as meaning that mitigation measures (referred to in the judgment as measures which are intended to avoid or reduce effects) should be assessed within the framework of an AA and that it is not permissible to take account of measures intended to avoid or reduce the harmful effects of the plan or project on a European

³ <http://curia.europa.eu/juris/document/document.jsf?docid=200970&doclang=EN>

⁴ Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora.

site at the screening stage. The screening exercise must therefore consider elements of the plan without any proposed mitigation.

If Likely Significant Effects (LSEs) on European sites are identified in screening, measures must be put in place to avoid them. Further investigation may be necessary to understand how the plan might affect the integrity of European sites i.e. HRA Task 2 (AA) and to develop effective avoidance and mitigation measures (or consider mitigation measures already proposed in relation to projects).

The following guidance has been referred to in undertaking the HRA:

- English Nature (2006) draft Guidance – The Assessment of Regional Spatial Strategies and Sub-regional strategies under the provisions of the Habitats Regulations;
- Scottish Natural Heritage (January 2015) Habitats Regulations Appraisal of Plans Guidance For Plan-Making Bodies In Scotland Version 3.0 originally prepared by David Tyldesley and Associates; and
- Department for Communities and Local Government (August 2006) Planning for the Protection of European Sites: Appropriate Assessment. Guidance for Regional Spatial Strategies and Local Development Documents. Draft.

3.1 Evidence Gathering

With reference to Figure 3.1, the evidence gathering task was completed in 2017. ClearLead Consulting wrote to Natural England in July 2017 to confirm the scope of the Habitats Regulations Assessment (HRA) of the Local Plan (Part 1). Natural England responded⁵ confirming that the three European sites which need to be considered in the HRA are:

- Epping Forest SAC;
- Lee Valley SPA and the Lee Valley Ramsar site; and
- Wormley-Hoddesdonpark Woods SAC.

These sites are shown in Figure 3.2.

⁵ Email from Natural England dated 15/08/18

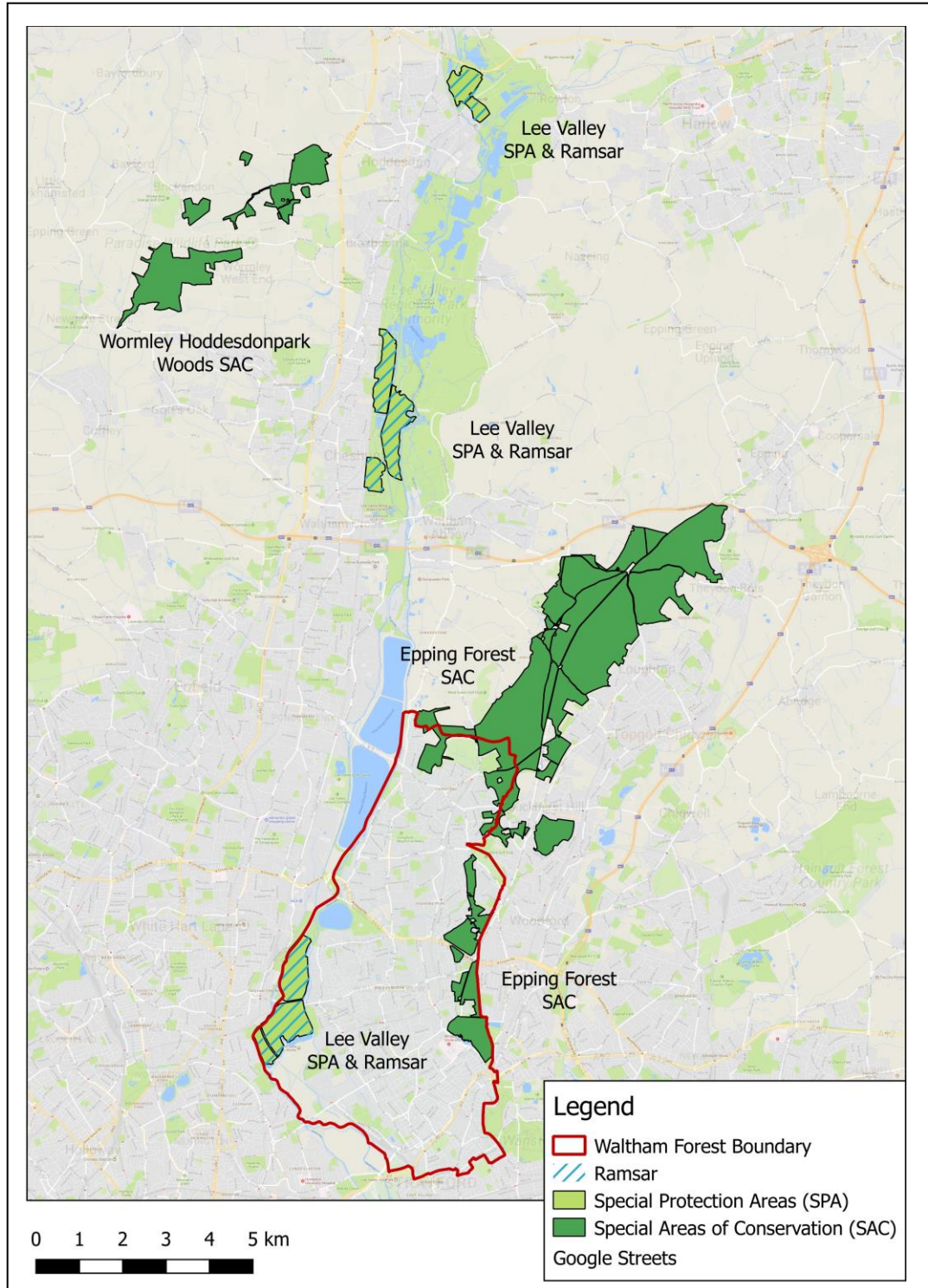


Figure 3.2: European sites in and near to the London Borough of Waltham Forest

Appendix A presents a summary of the site designations, qualifying features and site sensitivities. This information has been obtained from:

- Joint Nature Conservation Committee (JNCC) website www.jncc.gov.uk;
- Multi-Agency Geographical Information Centre (MAGIC) website www.magic.gov.uk;
- and
- Natural England site improvement publications.

3.2 Screening

Screening exercises have been undertaken at four key points in the plan preparation process:

- The Direction of Travel options consultation document (2017);
- Spatial strategy options (2018);
- Draft Local Plan (Part 1) Regulation 18 (2019); and
- Proposed Submission Local Plan (Part 1) Regulation 19 (2020).

The information on key factors affecting site integrity and objectives to ensure favourable condition status of the European sites presented in Appendix A has been referred to in all screening exercises.

In 2017, six spatial strategy options presented within the Direction of Travel Document were subjected to HRA screening and the findings were presented within a SA document which accompanied the Direction of Travel document during consultation⁶. The screening was high level, recognising that further work would be needed on the preferred option and draft Local Plan in order to determine potential effects of the Local Plan on European sites. The HRA screening exercise identified LSEs associated with all of the spatial strategy options consulted on.

In 2018, a proposed new spatial strategy was developed based on the Combined Approach spatial strategy option consulted on in 2017. As the new spatial strategy is strategic in nature and at that stage was not yet supported by draft policies, the HRA screening was again high level and followed the precautionary approach.

The screening of the new spatial strategy in 2018 identified a number of LSEs which would require further investigation in HRA Task 2 i.e. Appropriate Assessment (AA). It identified that the AA would need to consider the following impact pathways:

- Recreational pressure;
- Water pollution;
- Water demand;

⁶ CAG Consultants (November 2017) London Borough of Waltham Forest Local Plan Sustainability Appraisal, Appraisal of the 'Direction of Travel' Document

- Air pollution; and
- Urbanisation.

No potential effects of the Local Plan (Part 1) were ruled out at that point in plan preparation because other elements of the Local Plan (e.g. policies) were still to be developed and would require HRA screening in due course. Similarly, it was not possible to suggest mitigation or avoidance measures because the LSEs require assessment in the context of a draft Local Plan before these can be put forward. It was therefore identified that the AA would be undertaken on the Draft Local Plan, when policies would be available for consideration.

In July / August 2019, the Draft Local Plan (Part 1) was subject to HRA screening. Each policy within the plan was screened against the factors affecting European site integrity. HRA guidance⁷ was used to develop a set of screening criteria presented in Table 3.1.

Screening Rationale	Details
LSE	A likely effect is one that cannot be ruled out on the basis of objective information. The test is a 'likelihood' of effects rather than a 'certainty' of effects. Although some dictionary definitions define 'likely' as 'probable' or 'well might happen', in the Waddenzee case the European Court of Justice ruled that a project should be subject to Appropriate Assessment "if it cannot be excluded, on the basis of objective information, that it will have a significant effect on the site, either individually or in combination with other plans and projects".
No LSE - A general policy statement	A general statement of policy sets out a strategic aspiration for the plan-making body for a certain issue. A general 'criteria based' policy expresses the tests or expectations of the plan-making body when it comes to consider particular proposals. Does not necessarily include more site specific criteria based policies which may require AA.
No LSE - Not proposals generated by this plan	Aspects excluded from the appraisal because they are not proposals generated by this plan.

⁷ Scottish Natural Heritage (January 2015) Habitats Regulations Appraisal of Plans Guidance For Plan-Making Bodies In Scotland Version 3.0 originally prepared by David Tyldesley and Associates

Table 3.1: Draft Local Plan (Part 1) Screening Criteria	
Screening Rationale	Details
No LSE - A protection policy	Aspects which protect the natural environment, including biodiversity, or conserve or enhance the natural, built or historic environment.
No LSE - No development or change	Aspects which will not lead to development or other change.
No LSE - Makes provision for change but no impact pathway	Aspects which make provision for change but which could have no conceivable effect on a European site, because there is no link or pathway between them and the qualifying interests, or any effect would be a positive effect, or would not otherwise undermine the conservation objectives for the site.
No LSE - Policy is too general	Aspects which are too general so that it is not known where, when or how the aspect of the plan may be implemented, or where any potential effects may occur, or which European sites, if any, may be affected.

The findings of the screening exercise are presented in Section 4 of this report. The screening of policies has since been updated, using the same criteria, when the Proposed Submission amended policies became available in September 2020.

3.3 Appropriate Assessment

The AA of the Local Plan (Part 1) examines whether there is a risk of an adverse effects on the conservation objectives on the European sites as a result the impact pathways identified during screening (see section 3.2).

The effect of each of the impact pathways on each European Site is examined in detail within Section 6 onwards. Published research/documents relating to the potential impact pathway and the relevant European site was used within each AA topic section to assess adverse effects. Where a risk of an adverse effect on a European Site is identified as a result of the Local Plan then changes to the policy wording is proposed to avoid adverse effects occurring (HRA Task 3).

Where appropriate, in combination effects have been considered with regards to each of the potential impact pathway identified above. Where the potential for in combination effects with other plans was identified, the scope of the AA was broadened to assess the possible combined effects of plans in the wider area. These effects are considered in each AA topic section. Where the AA found that the Local Plan would have no effect at all on the European Site as a result of



an impact pathway then an adverse effect in combination is ruled out and no further assessment is required. This approach is in accordance with established case law (Foster and Langton⁸).

Details of plans and projects used to inform the in combination assessment of effects within each topic section are listed in Appendix 2.

3.4 Assessment Limitations

The HRA has been limited by the level of detail available for development within the borough, which is high level and does not include site allocations.

An air quality assessment of the effects of air pollution generated from an increase in traffic is underway at the time of writing this report. It has therefore not been possible to conclude Section 8 of the HRA at this stage. However, the results of the air quality assessment are expected in November 2020 at which time it is intended that an addendum to this HRA Report will be published.

Following examination, the Inspectors report (dated 2nd August 2019) concluded that the Epping Forest District Council Local Plan is not currently sound and requires major modifications before it can be accepted. Information to address the Inspector's comments is expected in 2020. This District lies adjacent to Waltham Forest and the majority of the Epping Forest SAC is located within these two authorities. Due to in combination effects from air pollution, recreation and urban effects on the SAC, it has not been possible to conclude Section 5, 8 and 9 of this report.

⁸ R (Foster and Langton) v Forest of Dean DC and Homes and Communities Agency [2015] EWHC 2648 (Admin) Cranston J

4 Screening Findings: Local Plan

4.1 Introduction

The Draft Local Plan (Part 1) was screened in August / September 2019 and the Proposed Submission version of the plan rescreened in September 2020. The policies which were screened in and for which LSEs were identified are presented in Table 3.1. LSEs were identified in relation to the following:

- Potential LSE on the Epping Forest SAC and the Lee Valley SPA/Ramsar due to increased recreational pressures;
- Potential LSE on the Lee Valley SPA/Ramsar relating to the risk of water pollutants entering the European Site;
- Potential LSE on the Lee Valley SPA/Ramsar due to water demand;
- Potential LSE on the Epping Forest SAC and Lee Valley SPA/Ramsar through an increase in traffic and therefore air pollution; and
- Potential LSE on the Epping Forest SAC and Lee Valley SPA/Ramsar from 'urban effects'.

A detailed screening table is provided in Appendix 3.

Table 3.1: Draft Local Plan (Part 1) Screened-in Policies

Policy number	Policy Name	Potential effects on European sites:		
		Epping Forest SAC	Lee Valley SPA and the Lee Valley Ramsar site	Wormley-Hoddesdonpark Woods SAC
2	Scale of Growth	Recreation, air quality, urbanisation including spread of invasive species / diseases	Recreation, water pollution, water demand, urbanisation and invasive species	None
3	Infrastructure for Growth	Recreation, urbanisation including spread of invasive species/diseases	None	None
8	Character-Led Intensification	Recreation, air quality, urbanization including spread of invasive species/ disease	Water pollution, recreation, urbanisation, invasive species and water resources	None
9	South Waltham Forest	Recreation, air quality, urbanisation including spread of invasive species and disease	Recreation, water resources, urbanisation including invasive species	None
10	Central Waltham Forest	Recreation, air quality, urbanisation including spread of invasive species and disease	Recreation, urbanisation, invasive species and water resources	None
13	Central Waltham Forest - Walthamstow Town Centre	Recreation and air quality	Recreation, urbanisation, invasive species and water resources	None
11	North Waltham Forest	Recreation, air quality, urbanization including spread of invasive species and disease	Water pollution, recreation, urbanisation, invasive species and water resources	None

Table 3.1: Draft Local Plan (Part 1) Screened-in Policies

Policy number	Policy Name	Potential effects on European sites:		
		Epping Forest SAC	Lee Valley SPA and the Lee Valley Ramsar site	Wormley-Hoddesdonpark Woods SAC
12	Increasing Housing Supply	Recreation, air quality, urbanisation including spread of invasive species and disease	Water pollution, recreation, urbanisation, invasive species and water resources	None
17	Redevelopment and intensification of existing housing and housing estates	Recreation, air quality, urbanisation including spread of invasive species and disease	Water pollution, recreation, urbanisation, invasive species and water resources	None
19	Small sites	Recreation, air quality, urbanisation including spread of invasive species and disease	Recreation, urbanisation, invasive species and water resources	None
23	Gypsies and Travellers	Recreation, air quality	recreation and water resources	None
25	Supporting and boosting economic growth and local jobs creation	Air quality	None	None
26	Safeguarding and Managing Strategic Industrial Locations (SIL)	Air quality	None	None
27	Safeguarding and Managing Local Significant Industrial Sites (LSIS)	Air quality	None	None
28	Safeguarding and Managing Borough Employment Areas	Air quality	None	None
29	Approach to Non-Designated Employment Land	Air quality	None	None
30	Industrial Masterplan Approach	Air quality	None	None
32	Workspaces	Air quality	None	None
42	Blackhorse Lane Creative Enterprise Zone	Air quality	None	None
63	Active Travel	Recreation	Recreation	None

Table 3.1: Draft Local Plan (Part 1) Screened-in Policies

Policy number	Policy Name	Potential effects on European sites:		
		Epping Forest SAC	Lee Valley SPA and the Lee Valley Ramsar site	Wormley-Hoddesdonpark Woods SAC
64	Public Transport	Air quality	None	None
84	The Lee Valley Regional Park	None	Recreation	None
86	Food Growing and Allotments	Urbanisation including spread of invasive species and diseases	Urbanisation including spread of invasive species	None

4.2 Screening Conclusions

As LSEs were identified on Epping Forest SAC and Lee Valley SPA and Ramsar in the screening of the Draft Local Plan (Part 1), it has been necessary to proceed to the AA stage of HRA. The AA is presented in Sections 5 to 10 of this report.

Following a more detailed screening of each impact pathway, no LSEs were identified on the Wormley-Hoddesdonpark Woods SAC. The site lies over 10.5km from the northern edge of the borough and due to this distance no potential impact pathways have been identified which could result from the Draft Local Plan (Part 1) policies. No AA of this site is therefore necessary.

No additional LSEs were identified during rescreening of the Proposed Submission Draft Local Plan in September 2020.

5 Appropriate Assessment: Recreational Pressures

5.1 Introduction

Screening of the Local Plan (Part 1) identified that the following Spatial Strategy Policies could have a potential LSE on the Lee Valley SPA/Ramsar and the Epping Forest SAC as they would result in population growth which could increase recreational pressures within these sites:

- Policy 2 Scale of Growth;
- Policy 3 Infrastructure for Growth;
- Policy 8 Character-Led Intensification;
- Policy 9 South Waltham Forest;
- Policy 10 Central Waltham Forest; and
- Policy 11 North Waltham Forest.

The screening also identified that the following Thematic Policies could result in a potential LSE on the Lee Valley SPA/Ramsar and Epping Forest SAC due to the increased recreational pressure on these sites through either population growth or changes to infrastructure routes within the borough.

- Policy 12 Increasing Housing Supply;
- Policy 17 Redevelopment and Intensification of Existing Housing and Housing Estates;
- Policy 19 Small Sites;
- Policy 23 Gypsies and Travellers;
- Policy 63 Active Travel;
- Policy 79 Green Infrastructure and the Natural Environment; and
- Policy 84: The Lee Valley Regional Park.

5.2 Background

The possible effects of relevance to this assessment are as follows:

- Trampling and wear from cyclists leading to soil compaction/erosion and damage to veteran tree roosts, eutrophication from dog fouling, grazing challenges due to interactions between visitors and livestock, direct damage to veteran trees from climbing, damage to tree saplings effecting recruitment of new trees, harvesting, disturbance to invertebrates and other wildlife. (Please note that potential effects of fires, spread of disease and

invasive species have been considered under the issue of 'Urban Effects' in Section 9); and

- Disturbance of the bird species for which the Lee Valley SPA and Ramsar is designated (either by people or cycling).

5.3 Assessment of Effects Alone and In Combination

5.3.1 Epping Forest SAC

Current recreational pressures on the Epping Forest SAC

Epping Forest is London's largest open space which is managed by the City of London as the Conservators of Epping Forest. The Epping Forest SAC is designated for its extensive woodland, heathland and its population of stag beetles.

Epping Forest SAC is a popular destination due to its location on the outskirts of London. The forest received 4.2 million visits in 2014⁹ and the City of London Corporation has concerns that high levels of people to the most popular parts of the forest are resulting in damage to vegetation and erosion of soils. Also, Epping Forest is a key mountain biking destination as it is easily accessible by train. Off-road cyclists are creating new tracks as they ride through the woodland and widening existing tracks¹⁰ which is leading to fragmentation, degradation, soil erosion and loss of habitat continuity. Natural England's Site Improvement Plan¹¹ lists Public Access/Disturbance as a priority issue that is currently impacting on the condition of the SAC.

Formal visitor surveys were undertaken in 2017 and 2019 by Footprint Ecology^{12,13} to understand the visitor use of Epping Forest SAC. The surveys identified that 75% of visitors to Epping Forest SAC in 2017 came from within 6.176km of the forest whereas in 2019 this figure was 6.67km (and 6.36km excluding the holiday makers). The zone from which 75% of visitors originate from is

⁹ Epping Forest Management Plan

(https://consult.cityoflondon.gov.uk/consult.ti/EF_Management_Plan_1/view?objectId=6711348)

¹⁰ www.trailforks.com/region/epping-forest/?activitytype=1&z=11.9&lat=51.67006&lon=0.04019

¹¹ Natural England (December 2014). Site Improvement Plan: Epping Forest.

¹² Liley, D., Panter, C., Weitowitz, D. & Saunders, G. (2018). Epping Forest Visitor Survey, 2017. Unpublished report by Footprint Ecology for the City of London Corporation as Conservators of Epping Forest.

¹³ Liley, D., (2019). Epping Forest Visitor Survey (2019). Unpublished report by Footprint Ecology for Epping Forest District Council.

considered by Natural England to be the 'Recreational Zone of Influence'¹⁴ and any proposed residential developments within this zone are therefore considered to have a recreational impact on the SAC. Natural England have confirmed that the Epping Forest SAC Recreational Zone of Influence should currently be set at 6.2km¹⁵; For the purpose of this HRA, 6.7km is considered to be the Recreational Zone of Influence; this distance encompasses all of the London Borough of Waltham Forest.

The visitor surveys found that the median distance that people travelled to the site (i.e. half the people interviewed) was 3.1km in 2017 and 2.6km in 2019. People living within this zone were more likely to visit the site more frequently. Natural England have confirmed that 3km is considered to be the Inner Recreational Zone of Influence.

Effects of the Spatial Strategy Policies on Epping Forest SAC from Draft Local Plan (Part 1) Policies Alone

Due to the proximity of the Borough of Waltham Forest to the Epping Forest SAC, all 19 Spatial Strategy Policies of the Draft Local Plan listed in Section 5.1 are likely to result in residential areas that fall wholly or partly within 3km of the SAC which is within the Inner Zone of Influence. These Spatial Strategy Policies could result in the addition of 27,000 homes, the vast majority of these are likely to occur within this inner zone. The population growth associated with these new homes would result in an increase in recreational pressures on the Epping Forest SAC. This SAC is already under pressure from existing high levels of recreational activity and therefore, without mitigation, the additional pressures are predicted to result in an adverse effect on the integrity of the SAC.

Mitigation Recommendations for the Spatial Strategy Policies

Natural England has produced an interim advice note on the Emerging Strategic Mitigation Strategy for the Epping Forest SAC (NE, 6th March 2019). This note advises that all residential development of 100 or more dwellings within 6.2km of the SAC should implement the following avoidance and mitigation measures to offset impacts arising from recreation activities:

- Make a financial contribution to strategic measures as set out in the costed Strategic Access Management Measures (SAMM) provided by the Conservators of Epping Forest. The exact details of the SAMM are currently being finalised but would be based on the scheme set out in the Interim Mitigation Strategy for Epping Forest Special Area of

¹⁴ Natural England Interim Advice Note (March 2019). Andrew Smith – Thames Team

¹⁵ Natural England Epping Forest SAC Zone of Influence (June 2020). Letter to Epping Forest District Council. Jamie Melvin – West Anglia Team

Conservation¹⁶. This scheme includes measures to encourage users to use designated routes/areas away from sensitive parts of the Forest and monitor visitor impacts on SAC features to guide visitor management; and

- Provision of Suitable Accessible Natural Greenspace (SANG) either within the proposed residential area or through provision of strategic SANGs to be managed by the Corporation of London. Alternatively, Natural England would also accept enhancements to existing green space by upgrading them to increase their carrying capacity or through improvements to the existing footpath network to enhance connectivity with local greenspaces.

Natural England also advises that all small-scale development within 3km of the SAC (99 dwellings or less) should also make a financial contribution to the SAMM. No mitigation measures are required for small scale developments over 3km from the SAC.

An Epping Forest SAC SANG Strategy would need to be developed and agreed with Natural England prior to the Local Plan being adopted. This would either be a strategic SANG strategy in partnership with other authorities within the Zone of Influence or specific to the Borough of Waltham Forest. It is recommended that the strategy would need to include the following information:

- Location of suitable SANG either within the borough or within the area surrounding Epping Forest SAC if strategic SANG is to be used;
- Number of dwellings the SANG could provide avoidance/mitigation for;
- Enhancement measures to existing greenspace within the borough to increase visitor capacity. The strategy should identify suitable greenspace and include details of how it would be uplifted to increase visitor capacity. For example, the Leyton Jubilee Park has been identified as a potential SANG to offset increases in recreational pressures to Epping Forest SAC as a result of development generated by Policy 9 South Waltham Forest. Improvement of the footpath network within this park is proposed thereby enabling visitors to use areas of the park which currently have limited accessibility; ; and
- The funding mechanism for creation and management of the SANG in-perpetuity.

Policy 83: The Epping Forest and Epping Forest Special Area of Conservation is a protection policy (refer to Box 2.5) which requires developments to contribute to a mitigation strategy to offset impacts of recreational pressures on the Epping Forest SAC. Further details on contributions towards the SANG and SAMM strategy would be set out in a Supplementary

¹⁶ Epping Forest District Council (October 2018). Interim Mitigation Strategy for Epping Forest Special Area of Conservation.



Planning Document (SPD), thereby ensuring an appropriate funding mechanism is in place to support this strategy.

The following supporting text to this policy sets out LBWFs approach in further detail: *'To mitigate for potential or identified adverse recreational effects of additional development in the borough, in particular from strategic developments, the Council will ensure provision of and access to sufficient Suitable Alternative Natural Green Space (SANGs). For Epping Forest SAC, SANGs provision should be in accordance with an agreed SANGs Strategy. This could involve:*

- (i) providing new green spaces; or*
- (ii) improving access to green spaces; or*
- (iii) improving the recreation facilities, naturalness, and habitat quality at existing greenspaces; or*
- (iv) improving connectivity between green spaces where this would not contribute to a material increase in recreational pressure on designated sites.'*

Effects of the Thematic Policies on Epping Forest SAC from Local Plan (Part 1) Policies Alone

Policy 19 Small Sites and Policy 23 Gypsy and Travellers are predicted to increase residential areas within 3km of the Epping Forest SAC (Inner Zone of Influence). This would result in population growth which, although small, could still contribute to recreational activities within the SAC. An adverse effect on the designated features of the SAC is therefore predicted as a result of these policies.

Policy 63 Active Travel, Policy 79 Green Infrastructure and encourage developments to improve connectivity with existing routes or green infrastructure which could increase recreational pressures within the SAC. These policies could potentially have an adverse effect on the integrity of the SAC.

Mitigation Recommendations for the Thematic Policies

Policy 83: *The Epping Forest and Epping Forest Special Area of Conservation* is a protection policy that ensure residential developments within the borough contribute towards avoidance and mitigation measures to offset impacts arising from recreation activities. This policy would ensure that there are no adverse effects on the SAC as a result of Policies 19 and 23.

It is also recommended that the wording of Policies 63 and 79 be altered to ensure that any improvements to access routes or green corridors within the borough would not result in adverse effects on the integrity of the Epping Forest SAC.

Assessment of In Combination Effects

The Local Plans of the following authorities would have an in combination increase in recreational pressures to Epping Forest SAC through delivering new housing within the 6.2km Recreational Zone of Influence (refer to Appendix 2 for further information):

- Epping Forest District Council;
- Harlow District Council;
- East Hertfordshire District Council;
- Broxbourne Borough Council;
- Brentwood Borough Council;
- London Borough of Waltham Forest;
- London Borough of Redbridge;
- London Borough of Enfield;
- London Borough of Newham;
- London Borough of Haringey;
- London Borough of Hackney;
- London Borough of Tower Hamlets; and
- London Borough of Barking and Dagenham.

All these authorities are included within the Epping Forest SAC Oversight Group and Natural England has provided a framework to enable these authorities to ensure no adverse effects from recreational pressures through implementing Natural England's Emerging Strategic Mitigation Strategy for Epping Forest (dated 6th March 2019). The Epping Forest District Council (EFDC) Local Plan (Submission Version dated 2017) was found to be not sound by the Inspector during the Examination (report dated 2nd August 2019) and requires major modification. The Inspector required further details on the SANG Strategy before it can be concluded that there would be no adverse effect on the SAC as a result of an increase in recreational pressures. Until EFDC's SANG Strategy is approved (expected in late 2020), **it is not possible to conclude no adverse effects from the recreational pressures resulting from the Local Plan (Part 1) when assessed in combination with the EFDC Local Plan.**

5.3.2 Lee Valley SPA and Ramsar

Current recreational pressures on the Lee Valley SPA and Ramsar

The Walthamstow Reservoirs SSSI is a complex of ten reservoirs which form part of the Lee Valley SPA/Ramsar. The Reservoirs occur in the far west of the borough and therefore are accessible to Waltham Forest residents. The remaining component parts of the Lee Valley SPA are not considered further as they are over 5km from the borough boundary with no direct roads that run close to these component parts.



The Walthamstow Reservoirs are managed to meet the operational needs of the site's main focus as water supply reservoirs. The 'Walthamstow Wetlands Project' was completed in 2017 and was supported by an HRA to ensure it did not have an adverse effect on the integrity of the SPA/Ramsar¹⁷. The project has enhanced the main public access points into the site and provided new public access routes around parts of the reservoir. An access management system is in place with primary and secondary routes around the site. Seasonally restricted routes also occur which are shut off from the public during sensitive times for the rare birds that use the site. A visitor centre, café and exhibition space are located in the centre of the reservoir complex. Dogs are not permitted within the site at any times and cycling is only permitted on primary routes. Fishing and bird watching, which was previously unrestricted, is controlled by fishing and birdwatching permits which are capped to protect the reservoirs. The site is managed by dedicated wardens.

The access management system's primary requirement is to protect the sensitive bird areas within the SPA/Ramsar from recreational activities. The important bird areas were identified by extensive ornithological surveys, focussing on the shoveler, gadwall and bittern populations that are the designated feature of the SPA/Ramsar. The surveys were undertaken to support the HRA of the project and are updated annually. The results of the post construction bird surveys found that bird distribution was consistent with the pre-construction baseline and the mitigation within the design of the site was effective¹⁸.

The number of visitors to the reservoirs in 2018 was estimated to be 70,000 per annum with this number predicted to gradually increase until 2023/24 when visitor numbers are set to plateau at 180,000 per annum¹⁹.

Effects of Local Plan (Part 1) on Lee Valley SPA and Ramsar

The predicted population growth resulting from policies within the Local Plan (Part 1) is likely to result in an increased use of the site by the public. The potential effects of this increase in recreational pressure on the SPA/Ramsar features due to visual and/or audible disturbance is discussed below.

Dogs (with the exception of Assistance Dogs) and use of public vehicles are both not permitted within the SPA and therefore recreational activities are restricted to walkers, cyclists, anglers and bird watchers.

¹⁷ BSG Ecology 2014. Part 1: Report to Inform a Habitats Regulations Assessment for the Lee Valley Special Protection Area. Walthamstow Reservoirs – Walthamstow Wetlands Project.

¹⁸ www.bsg-ecology.com/portfolio_page/walthamstow-wetlands-ornithological-survey-design-inputs-hra-support Website accessed 5 March 2020

¹⁹ Walthamstow Wetlands Project Business Plan cited in BSG Ecology, 2014.



The access management scheme restricts public access to sensitive parts of the site during the autumn and winter to protect the populations of gadwall, shoveler and bittern. A high level of monitoring is undertaken by wardens to ensure recreational activities do not adversely impact the birds within the SPA. The results of the monitoring are provided to Natural England annually. In the event that adverse effects are identified then the access management system includes measures to enable routes to be temporarily or permanently closed by installation of additional gates or screens.

Unauthorised entry to the site through cutting gaps in the perimeter fence could potentially occur as a result of an increase in the population, if the SPA/Ramsar is accessible to residents of the proposed development adjacent this European Site. This could result in disturbance to sensitive bird areas. This issue is relevant to Policy 10 Central Waltham Forest and Policy 19 Small Sites which could result in an increase in residential development around Blackhorse Lane potentially within 50m of the SPA/Ramsar. However, the SPA/Ramsar is separated from Blackhorse Lane by the Lee Flood Relief Channel and Thames Water security fencing. The SPA/Ramsar can only be directly approached from the south or from Forest Road. In each case robust security fencing borders the site (tall metal fence with spikes or wooden palisade fence overtopped by strands of barbed wire). It is noted that existing residential development is within the Blackhorse Lane area and post-construction bird surveys have not recorded any adverse effects on bird distribution. It is therefore concluded that the site is not susceptible to unauthorised access due to proposed development at Blackhorse Lane and no adverse effect on the integrity of the SPA/Ramsar is therefore predicted.

Assessment of In Combination Effects

The access management strategy being implemented at Walthamstow Reservoirs has been specifically designed to ensure there are no impacts on the bird interest within the SPA/Ramsar and this strategy, therefore, already provides a mechanism to ensure no future adverse effects occur as a result of population growth in the area. Therefore, no residual effects are predicted on the integrity of the SPA/Ramsar as a result of increased population due to the Local Plan (Part 1). No in combination assessment of recreational pressures on this European Site is therefore required. The access management scheme within the SPA/Ramsar is also considered to be sufficiently robust to account for population increases from other plans or projects.

5.4 Conclusion

5.4.1 Epping Forest SAC

Epping Forest SAC is currently subject to high levels of recreational pressures which are causing damage to the habitats and erosion of soils within the site²⁰. Visitor surveys of Epping Forest have found that the entire borough falls within the 6.2km Recreational Zone of Influence. The Local Plan would result in 27,000 new homes within the Zone of Influence which is predicted to have an adverse effect on the integrity of the SAC due to increased recreational pressures.

Natural England has produced an interim advice note on the Emerging Strategic Mitigation Strategy for the Epping Forest SAC. This strategy provides a framework which enables the adverse effects on the SAC to be mitigated. The requirement to implement this mitigation framework is included within 'Policy 83: The Epping Forest and Epping Forest Special Area of Conservation' of the Proposed Submission Version Local Plan Part 1. Provided the mitigation recommendations within Section 5.3.1 of this report are implemented, then it can be concluded that the Local Plan will have no adverse effects on the integrity of Epping Forest SAC with regards to recreational pressure arising from the Waltham Forest Local Plan (Part 1) policies.

However, EFDC's Local Plan was not found to be sound during Examination in 2019 and the Inspector required more detailed information on their SANG Strategy before it can be concluded that their Plan would not have an adverse effect on the SAC as a result of recreational pressures. Until EFDC's SANG Strategy is approved, it is **not possible to conclude no adverse effects from the Local Plan when assessed in combination** with the EFDC Local Plan.

5.4.2 Lee Valley SPA and Ramsar

The access management strategy being implemented at Walthamstow Reservoirs has been specifically designed to ensure there are no impacts on the bird interest within the SPA/Ramsar. This strategy already provides a mechanism to ensure no future adverse effects occur as a result of population growth in the area. Therefore, **no adverse residual effects on the integrity of the Lee Valley SPA /Ramsar are predicted** as a result of recreational pressures due to the Local Plan (Part 1) either alone or in combination.

²⁰ Natural England (December 2014). Site Improvement Plan: Epping Forest.

6 Appropriate Assessment: Increase in Water Pollution

6.1 Introduction

Screening did not identify any policies as having an LSE due to water pollutants entering the Epping Forest SAC as no increase in development is proposed immediately adjacent the SAC. No impact pathway has therefore been identified and no further assessment of this SAC is undertaken in this section.

Screening identified the following policies could result in a potential LSE from water pollutants entering the Lee Valley SPA/Ramsar as they could increase development either adjacent to this European Site or along watercourses linked to the site:

- Policy 10 Central Waltham Forest;
- Policy 11 North Waltham Forest;
- Policy 12 Increasing Housing Supply; and
- Policy 17 Redevelopment and Intensification of Existing Housing and Housing Estates.

6.2 Background

Construction of the proposed developments could result in pollutants entering the Lee Valley SPA and Ramsar via a potential impact pathway, such as a watercourse, which creates a hydrological connection between a proposed development site and the European Site. Pollution could include dust (cement powder) and hydrocarbons (fuels/oils) being released during movement across the construction site or from general construction activities such as any spillages, the release of metal fines and construction material pollutants (welding and wet concrete). Site pollutants could then enter watercourses linked to the European Sites either directly or through contamination of surface water run-off. These pollutants could reduce water quality thereby impacting on the habitats and the associated food source of the birds within the SPA and Ramsar.

Pollutants could also potentially enter the SPA and Ramsar during the operational phase of the development projects through spills, leaks, sediments and discharges.

Although the Local Plan only gives high level information on proposed development location, a review of the location of the Lee Valley SPA and Ramsar and the upstream section of the River Lee was undertaken. OS Maps (1:10,000 scale) were used to determine if it was feasible that development resulting from the policies listed in Section 6.1 could be located adjacent to these water features.

The increase in population as a result of the Local Plan (Part 1) could also result in the following:

- An increased discharge of waste from wastewater treatment works that discharge into the River Lee or its tributaries; and
- An increase in traffic travelling along roads that run directly past the SPA/Ramsar.

A review of the location of the wastewater treatment works and roads adjacent the SPA/Ramsar was therefore also undertaken.

6.3 Assessment of Effects Alone and In Combination

Local Plan Policies 10, 11, 12 and 17 could result in an increase in development either along the River Lee or adjacent to the Lee Valley SPA and Ramsar which could increase pollutants and surface water run-off during construction and operation of the sites. However, the Local Plan (Part 1) includes a protection policy which would ensure the water quality of the River Lee is not adversely impacted by new development either during construction or operation. Policy 91 Water Quality and Water Resources states that “*new development should prevent any adverse impacts on water quality and water supply by:*

A) Ensuring new development that is seen to have the potential to cause adverse effects on water quality provides appropriate mitigation to alleviate risk;....

D). Ensuring that development proposals appropriately manage foul water and surface water connections and provide adequate wastewater infrastructure capacity;

E). Work with infrastructure providers (Policy 75 Utilities Infrastructure) to protect existing water and sewerage infrastructure and manage pressure on combined sewer networks.”

Policy 91 would ensure that construction of the proposed developments adheres to current government guidelines for the control of water pollution (www.gov.uk/guidance/pollution-prevention-for-businesses). Control measures to protect the water environment during site operation would be inherent to the design of these developments.

Overall, the Local Plan (Part 1) would not result in an adverse effect on the integrity of the Lee Valley SPA and Ramsar due to water pollution.

6.4 Conclusions

The Lee Valley SPA and Ramsar is an existing reservoir which will continue to operate as a drinking water resource throughout the 2020-2035 Local Plan period. All planning applications for development that potentially impact water quality within this reservoir will be subject to a high degree of scrutiny by Waltham Forest Council and Thames Water to ensure the reservoir is protected. Also, Local Plan Policy 91 Water would ensure that the water environment within the borough, which includes waterways connected to the Lee Valley SPA, would not be adversely



impacted by new developments. It is therefore concluded that the Local Plan(Part 1) **would not result in a risk of an adverse effect on the integrity of the Lee Valley SPA and Ramsar** with regards to water quality either alone or in combination with neighbouring plans and projects.

7 Appropriate Assessment: Water Demand

7.1 Introduction

Screening of the Local Plan (Part 1) did not identify a LSE on the Epping Forest SAC in relation to an increase in water demand. This SAC does not supply water to Waltham Forest residents and no impact pathway has therefore been identified. This SAC is therefore not considered further within this topic section. Screening of the Local Plan (Part 1) identified that the following policies could increase water demand and therefore result in a LSE on the Lee Valley SPA and Ramsar through increasing housing provision and therefore the population of the Borough:

- Policy 2 Scale of Growth;
- Policy 9 South Waltham Forest;
- Policy 10 Central Waltham Forest;
- Policy 11 North Waltham Forest; and
- Thematic Policies - Policy 19 Small Sites and Policy 23 Gypsy and Traveller Sites.

7.2 Background

The Borough of Waltham Forest lies within the Thames Water supply area. Water supplies originate from a mixture of surface water sources and groundwater sources. The surface water sources are primarily from the Lee Valley Reservoir Chain which are supplied by the River Lee. Several of these reservoirs occur within Waltham Forest, including Walthamstow Reservoirs SSSI which is a component site of Lee Valley SPA. An increase in water demand due to an increase in population in the area could impact on water levels within Walthamstow Reservoirs, thereby having an adverse effect on the habitats within the SPA and Ramsar site. Also, climate change could further impact on water levels within the reservoirs due to changes to rainfall amounts and distribution.

7.3 Assessment of Effects Alone and In Combination

Water levels within the Walthamstow Reservoir SSSI are directly controllable by Thames Water who have created the open water habitat which has attracted the birds for which the SPA/Ramsar is designated. The Draft Thames Valley Water Resource Management Plan²¹ shows how they will supply water to their customers over an 80-year period (up to 2100) and includes for population increases in the area during this period. They have invested in water supply

²¹ Thames Water (2019) Revised Draft Water Resources Management Plan



infrastructure, including operational desalination plants such as the Thames Water Desalination Plan which is operational throughout the plan period. These investments ensure London's water supply is resilient to changes.

An HRA of the Draft Water Resource Management Plan has been undertaken²² which concludes that the plan would have no adverse effects on the integrity of any European site, either alone or in-combination with other plans or projects.

Licences to abstract water from sources linked to the Lee Valley SPA are issued by the Environment Agency (EA) who regulate the impact of the continued abstraction on European Sites. The EA's 'Review of Consents' process identified the effects of the continued utilisation of these abstraction sources on European Sites, including the Lee Valley SPA. This Review of Consents identified several licensed sources that needed to be assessed further to determine whether they had the potential to adversely affect the hydrogeological or hydrological regime of the Lee Valley SPA. An HRA of these licences was carried out by the EA in 2008 which concluded that the continued abstraction by Thames Water under licence would not have an adverse impact on the Lee Valley SPA. Although this HRA was undertaken in 2008, this conclusion is also relevant to new resourcing schemes, because some involve increasing existing abstractions at licensed sites while still remaining within the existing approved licence limit. New abstraction licences above the approved limit would not be granted by the EA if they harm European Sites.

The Local Plan also includes policy to increase water efficiency within new developments. Policy 91 Water stipulates that new development should prevent adverse impacts on water supply by:

“B. Ensuring developments include water efficiency measures including rainwater harvesting, greywater recycling and smart-metering;

C. Ensuring residential schemes achieve a water efficiency target of 105 litres per person/day or less plus an allowance of 5 litres of water per person - per day for external water use, and non-residential developments including refurbishments target maximum water credits in BREEAM or equivalent;”

Overall the Local Plan (Part 1) would not result in an adverse effect on the integrity of the Lee Valley SPA and Ramsar due to water abstraction either alone or in combination with growth in neighbouring plans.

²² Ricardo Energy & Environment (September 2019). Habitats Regulation Assessment of Thames Water Revised Draft Water Resources Management Plan 2019. Report for Thames Water.

7.4 Conclusions

Due to the water infrastructure that Thames Water have invested in and the further protection by the EA's Review of Consents process, it is concluded that the Local Plan (Part 1) **would not have an adverse effect on the integrity of the Lee Valley SPA and Ramsar** either alone or in combination with growth in neighbouring plans.

8 Appropriate Assessment: Increased traffic on air quality

8.1 Introduction

Screening of the Local Plan (Part 1) identified that the following policies could increase traffic and therefore air pollution and result in a LSE on the Epping Forest SAC:

- Policy 2 Scale of Growth;
- Policy 9 South Waltham Forest;
- Policy 10 Central Waltham Forest;
- Policy 11 North Waltham Forest; and
- Thematic Policies - Policy 19 Small Sites and Policy 23 Gypsy and Traveller Sites, Policy 25 Supporting and boosting economic growth and local jobs creation, Policy 26 Safeguarding and Managing Strategic Industrial Locations (SIL), Policy 27 Safeguarding and Managing Local Significant Industrial Sites (LSIS), Policy 28 Safeguarding and Managing Borough Employment Areas, Policy 30 Industrial Masterplan Approach, Policy 32 Workspaces, Policy 38 Blackhorse Lane Creative Enterprise Zone and Policy 64 Public Transport.

Screening of the Local Plan (Part 1) did not identify a LSE on the Lee Valley SPA and Ramsar in relation to air quality. Although roads occur within 200m of Walthamstow Reservoir SSSI, which is a component of the Lee Valley SPA and Ramsar, they are sealed reservoirs that are designated for the bird interest which rely on freshwater habitats. Freshwater habitats are typically not susceptible to atmospheric pollution from road traffic (refer to Appendix 3 for further information). This SPA and Ramsar is therefore not considered further in this topic section.

8.2 Background

The Local Plan (Part 1) could potentially cause an adverse effect on the European sites identified above if traffic (and therefore emissions to air) were to increase within the borough or beyond the borough boundary for trips to access employment or other facilities such as cultural or retail. This could result in an increase in nitrogen deposition, which could have a direct or indirect effect on habitats sensitive to additional nitrogen. Direct effects arise when a pollutant is dispersed in the air and taken up by vegetation causing an adverse impact on plant health. Indirect effects occur when the pollutant settles onto the ground causing eutrophication or acidification of the soil. These effects can lead to changes in species composition due to encroachment of plants that favour higher nitrogen levels.



Natural England advises that European Sites falling within 200m of the edge of a road affected by a plan or project need to be considered further²³ ²⁴(this does not mean that there is not the possibility of impacts due to increasing emissions from diffuse sources).

In order to conclude the air pollution part of the AA, traffic data has been obtained from Transport for London (TfL). The analysis of the data has shown that there are a number of roads with Waltham Forest which pass within 200m of Epping Forest SAC on which traffic is predicted to increase by over 1000 Annual Average Daily Traffic (AADT) over the plan period. Following an accepted methodology within the Design Manual for Roads and Bridges, these predicted traffic increases are considered 'significant' and a further study is required in order to assess whether air quality impacts, and therefore impacts on the habitats of Epping Forest, could be caused by the predicted traffic increases. The results of the air quality study will be used to assess the changes to air quality around the SAC resulting from the Local Plan (Part 1).

It is noted that the number of vehicle registrations per annum within the borough is currently decreasing²⁵ and this along with the predicted increase in electric vehicles and protection policies within the Local Plan Part 1 (which will limit car parking in new developments) will be taken into consideration in reaching the conclusions of the HRA.

8.3 Assessment of Effects Alone and in-combination

The assessment of effect will be completed once the air quality study has been completed. It is therefore **not possible to currently conclude that there would not be an adverse effect on Epping Forest SAC from air pollution.**

²³ SIGNAL, K., ASHMORE, M. & POWER, S. 2004. The ecological effects of diffuse air pollution from road transport. English Nature Research Report No. 580, Peterborough.

²⁴ RICARDO-AEA, 2016. The ecological effects of air pollution from road transport: an updated review. Natural England Commissioned Report no.199.

²⁵ Data provided by London Borough of Waltham Forest. 13/12/2019

9 Appropriate Assessment: Urban Effects

9.1 Introduction

A variety of 'urban effects' can result in adverse impacts on European sites. Those considered in particular in this section are given below:

- Cat predation;
- Localised effects from construction;
- Fires; and
- Fly tipping / litter resulting in spread of diseases and invasive species.

Screening of the Local Plan (Part 1) has identified that the following policies could result in an LSE from urban effects on the Epping Forest SAC as they could potentially result in development within 500m of the SAC boundary:

- Policy 2 Scale of Growth;
- Policy 3 Infrastructure for Growth;
- Policy 9 South Waltham Forest;
- Policy 10 Central Waltham Forest;
- Policy 11 North Waltham Forest;
- Policy 19: Small Sites; and
- Policy 86: Food Growing and Allotments.

Screening of the Local Plan has also identified that the following policies could result in an LSE on the Lee Valley SPA and Ramsar as they would increase development within 500m of this site:

- Policy 2 Scale of Growth;
- Policy 9 South Waltham Forest;
- Policy 10 Central Waltham Forest; and
- Policy 19: Small Sites.

9.2 Background

This sub-section gives an outline of the evidence regarding each urban effect outlined in Section 9.1 followed by a summary of the effects of relevance to each European Site in sub-section 9.3:

The localised effects of water pollution and recreational pressures including the effect of dogs on the Lee Valley SPA/Ramsar and Epping Forest SAC are considered in Section 5: Recreational Pressures and Section 6: Water Pollution.

9.2.1 Cat predation

Cat predation is considered to be a potential issue for the wintering birds within the Lee Valley SPA as birds are particularly vulnerable to predation. Studies have shown that on average cats roam up to 400m although they can occasionally roam further²⁶. 400m from the proposed development is considered to be the zone where adverse effects from cat predation could occur.

9.2.2 Localised effects from construction

Possible localised effects from construction that are relevant to this assessment are as follows:

- Construction could create air pollution which could have adverse effects on the habitats within the European sites. Construction dust falls out within 200m of a site and therefore development within this 200m zone could result in damage to the features of a European Site; and
- Construction activities could result in disturbance to birds that occur in adjacent development sites due to construction noise and visual disturbance.

Effects of construction on water quality are discussed in Section 6.

9.2.3 Fires

Fires can have significant effects, both on woodland and heathland, and on the birds or animals that live on these habitats. Effects can be temporary, but they can also be long-term or even permanent.

Studies have been undertaken on the cause of fires^{27 28}, although much of this is based on research on the lowland heathland in the Dorset Heaths. The principle causes of 'wild' fires are: deliberate fire-setting; camp fires/barbeques; planned fires that have got out of control (e.g. planned moorland management fires).

There is some evidence that a significant proportion of deliberate fire setting is by school-aged children. The Kirby & Tantram research showed that where more than 15% of the surrounding area (taken to be a 500m buffer around the designated site) was developed the numbers of

²⁶ Barratt, D.G. (1997). Home range size, habitat utilisation and movement patterns of suburban and far cats *Felix catus*. *Ecography* 20 271-280.

²⁷ J. C. Underhill-Day, (2005) 'A literature review of urban effects on lowland heaths and their wildlife', English Nature Research Reports, Number 623

²⁸ J.S. Kirby & D.A.S Tantram (1999) 'Monitoring heathland fires in Dorset: Phase 1' Report to Department of the Environment, Transport and the Regions: Wildlife and Countryside Directorate

unplanned fires increased; below this threshold the incidence of fires was close to zero. The 500m zone correlated with the maximum likely access distance for average users of greenspace^{29 30}.

9.2.4 Fly-tipping / litter resulting in spread of invasive species and diseases

Fly-tipping and littering including garden waste are likely to be more prevalent when the urban area is within 500m of the SPA/SAC boundary (Liley, 2004; Liley, 2005; Underhill-Day, 2005). A study of Yateley Common to Castle Bottom SSSI (Liley, 2004) found that garden waste dumping was concentrated around the developed edges of the SSSI/SPA. Dumping of garden waste also increases the spread of invasive non-native species and diseases within a SAC/SPA i.e. rhododendron can be a host to the *Phytophthora* pathogen which is a threat to beech trees³¹. Release of unwanted pets and fish is also likely to be more prevalent from urban areas within 500m of a SAC/SPA.

9.3 Assessment of effects alone and in-combination

9.3.1 Epping Forest SAC

Effects of the Local Plan (Part 1)

No adverse effects on the SAC are predicted from dust deposition during construction or an increase in cat population as a result of the Local Plan (Part 1) for the following reasons:

- Construction of developments within the borough would follow guidance set out in the Mayor of London's 'The Control of Dust and Emissions During Construction and Demolition Supplementary Planning Guidance.' This guidance ensures that appropriate dust control measures are implemented on construction sites. Adverse effects on the SAC as a result of dust deposition is therefore unlikely.
- Cats are not predicted to have an effect on the stag beetle population which is one of the reasons for the SAC designation. The heavily urban context of the boundary between the SAC and the borough means that an existing domestic cat population is already likely to occur within Epping Forest. The potential increase in cat population resulting from the

²⁹ Harrison, C, Burgess, J, Millward, A, Dawe, G. 1995. Accessible greenspace in towns and cities: A review of appropriate size and distance criteria. English Nature Research Report No. 153. English Nature, Peterborough.

³⁰ Box, J. & Harrison, C. 1993. Natural spaces in urban places. Town 19 Country Planning, 62(9): 231-235

³¹https://consult.cityoflondon.gov.uk/consult.ti/EF_Management_Plan_1/viewCompoundDoc?docid=6709076&sessionId=&voteid=&partId=6711220



Local Plan (Part 1) is not expected to have an adverse effect on the integrity of the stag beetle population within the SAC.

The management of fly-tipping and litter and its associated risk of introduction of non-native species and disease through garden waste is identified as an issue for Epping Forest SAC by the City of London Corporation. Collection and disposal of fly-tipping waste and litter costs over £250,000 a year. Also, substantial fires have previously occurred within Epping Forest SAC³². Although the City of London Corporation employs staff to deal with litter/fly-tipping and an Emergency Plan is in place which covers fires, these issues are having a drain on limited resources.

Policy 95: Waste Management within the Local Plan (Part 1) is a protection policy that would result in a reduction of waste production and subsequent disposal. It also ensures that all new development includes sufficient waste and recycling facilities. This policy therefore is likely to reduce fly-tipping within Epping Forest SAC.

Notwithstanding this, research has shown that fly-tipping, litter and fire risk are more likely to occur within 500m of a European Site, with adverse effects increasing nearer to the SAC. The policies listed in Section 9.1 as having a LSE on the SAC could result in an increase in development within 500m of Epping Forest SAC. Only high-level information on potential development location is included within the Local Plan (Part 1) and it is noted that movement barriers may be present between the proposed development and the SAC (i.e. busy roads), which may limit access to the SAC. However, following the 'precautionary approach', it is assumed that these policies could potentially increase urban effects within the SAC thereby resulting in an adverse effect on the integrity of the SAC.

Mitigation Recommendations

Strategic level mitigation

The SAMM Strategy for Epping Forest SAC provides strategic mitigation to offset the adverse impacts of development in the area. The final costed SAMM strategy is currently being completed by the Conservators of Epping Forest. However, the final strategy would be based on the scheme set out in the Interim Mitigation Strategy for Epping Forest Special Area of Conservation (2018), which was prepared by Epping Forest District Council in partnership with the Conservators. This scheme sets out management measures for the whole of the SAC including areas within the LBWF and includes the following mitigations measures to reduce litter/fly-tipping and fire risk:

- Funding for a Mitigation Strategy Delivery Officer who would be supported by an Apprentice and 'SAC Ambassadors'. Their responsibilities would include running

³² <https://www.bbc.co.uk/news/uk-england-london-23382771> website accessed 5 March 2020

educational activities/out-reach projects to improve users understanding of the importance of Epping Forest SAC and undertake 'Leave no Trace' workshops to reduce littering/fly-tipping.

- Redirecting access away from sensitive SAC habitats thereby reducing littering and fire-risk to these features.

Policy 83: The Epping Forest and Epping Forest Special Area of Conservation is a protection policy (refer to Box 2.5). Bullet Point C of this policy states that 'Planning applications for development and allocations within 500m of the Epping Forest SAC must demonstrate through project level HRA that the development will not generate adverse urban effects on the integrity of the SAC.' This policy ensures that the Local Plan (Part 1) contains a mechanism to protect the Epping Forest SAC from urban effects once the development details are known. Additional mitigation measures may need to be incorporated into these developments where necessary (i.e. project designed to limit access to the SAC and enhance footpaths to alternative accessible greenspace on and off-site).

Assessment of In Combination Effects

Epping Forest SAC is also located partly within the London Borough of Redbridge and Epping Forest District. The Redbridge Local Plan (adopted March 2018) aims to provide 17,237 new homes across the borough. The HRA of this Local Plan states that an estimated 53 units would be located within the Epping Forest SAC zone of influence for urban effects (defined as 400m within the Redbridge HRA). The EFDC Local Plan 2011-2033 (Submission Version dated December 2017) makes provision for a minimum of 11,400 new homes. The HRA of this Local Plan found that 10 allocated sites are located within 400m of the SAC.

Both the Local Plans for Redbridge and Epping Forest include policy specifying that development adjacent the SAC would need a project level HRA to be undertaken prior to granting permission in order to demonstrate that no adverse effects will occur to this SAC. However following Examination, the Inspectors report (dated 2nd August 2019) of the Epping Forest Local Plan (Submission Version December 2017) concluded that the Plan is not currently sound and requires major modifications before it can be accepted. Urban effects on the SAC was identified as one of the issues by the Inspector and further work is currently being undertaken.

The London Borough of Enfield is approximately 350m to the west of Epping Forest SAC. The Enfield Local Plan is being prepared which is likely to result in new homes across the borough; however, King George Reservoir lies on the eastern edge of this borough and therefore it is not possible for development to be located within 500m of the SAC and no in combination urban effects from this Local Plan are therefore predicted.

9.3.2 Lee Valley SPA and Ramsar

Effects of the Local Plan (Part 1)

The following potential urban effects are unlikely to impact the birds for which the SPA and Ramsar is designated:

- Cats are not predicted to have an effect on the SPA and Ramsar feature as the likelihood of a cat regularly preying on gadwall, shoveler or bittern is very remote;
- Fire risk within the SPA/Ramsar is considered to be low as the majority of the habitats within the site are aquatic;
- Invasive species release and spread of disease into the SPA/Ramsar through fly-tipping of garden waste and release of fish is considered to be unlikely as the reservoir is surrounded by security fencing and none of the policies within the Local Plan (Part 1) would result in gardens backing on to the site. Also, Policy 95: Waste Management would result in a reduction of waste production and subsequent disposal.
- Visual disturbance of birds is unlikely as the reservoirs are already screened from surrounding land as they have high retaining banks and marginal vegetation.
- Construction of developments within the borough would follow guidance set out in the Mayor of London's 'The Control of Dust and Emissions During Construction and Demolition Supplementary Planning Guidance. This guidance ensures that appropriate dust control measures are implemented on construction sites. Adverse effects on the SPA/Ramsar as a result of dust deposition is therefore unlikely.

The Local Plan (Part 1) could result in an urban effect from noise being generated by the construction of developments near to the SPA/Ramsar. A 3-year study of wetland birds at the Stour and Orwell SPA³³ found that the birds reacted most to relatively infrequent events, such as gun shots and aircraft noise. Birds seemed to habituate to frequent 'benign' events such as vehicles, sailing and horses, but there was evidence that apparent habituation to more disruptive events related to reduced bird numbers as birds appeared to avoid the most frequently disturbed areas.

Local Plan (Part 1) Policy 19: Small Sites could result in residential development within 50m of the Lee Valley SPA and Ramsar (in the Blackhorse Lane area) which could increase noise levels within this European Site. The birds within the SPA and Ramsar are likely to have become habituated to a degree of background noises as the area is surrounded by urban development with busy roads. Nonetheless, increased noise levels within the site during the sensitive winter period, particularly during construction, could disturb the designated bird species within the SPA/Ramsar. Therefore, a risk of an adverse effect on the integrity of the Lee Valley SPA/Ramsar cannot be ruled out at this stage due to potential urban effects from Local Plan (Part 1) Policy 19.

³³ Ravenscroft, N. (2005) Pilot study into disturbance of waders and wildfowl on the Stour-Orwell SPA: analysis of 2004/05 data. Report to Suffolk Coast & Heaths Unit.



All remaining policies listed in Section 9.1 are not predicted to have an urban effect on this European Site due to distance from the site or the small size of the development proposed.

Mitigation Recommendations

Policy 84F: The Lee Valley Regional Park states that '*Planning applications for development at Blackhorse Lane will need to be accompanied by a project level HRA to ensure the development will not generate adverse urban effects on the integrity of the Lee Valley SPA and Ramsar*'. This would protect the Lee Valley SPA/Ramsar from adverse urban effects generated by Policy 19.

Assessment of In Combination Effects

The Walthamstow Reservoirs SSSI, which is the component site of the Lee Valley SPA/Ramsar located within Waltham Forest, is located immediately to the east of the London Borough of Haringey and immediately to the north of the London Borough of Hackney. Both boroughs have produced HRAs of their Local Plans (refer to Appendix 2 for further Local Plan information) which conclude that there will be no adverse effects on this the Lee Valley SPA/Ramsar either alone or in combination with other plans and projects.

9.4 Conclusions

9.4.1 Epping Forest SAC

Epping Forest SAC is currently subject to urban effects primarily from fly-tipping and litter but also from fires. The Local Plan (Part 1) would result in new homes located within 500m of the SAC.

Provided that the mitigation recommendations detailed in Section 9.3.1 of this report are implemented within the Local Plan (Part 1) then it can be concluded that the Plan would not result in adverse urban effects on the integrity of Epping Forest SAC alone.

The EFDC Local Plan provides protection policies to ensure that urban effects do not occur on the Epping Forest SAC. However, EFDC are undertaking further investigation on the effects of urbanisation (to be completed in 2020) as their Plan was found to be unsound during examination. Until EFDC resolves the issue of urbanisation, it is **not currently possible to conclude no adverse effects from the Local Plan when assessed in combination** with EFDC Local Plan.

9.4.2 Lee Valley SPA and Ramsar

Policy 84: The Lee Valley Regional Park provides protection from urban effects generated by the Local Plan (Part 1). It can be concluded that the Plan **would not result in an adverse urban effect on the SPA/Ramsar** either alone or in combination.

10 Summary, Mitigation and Conclusions

10.1 Screening Results

HRA screening of the Local Plan (Part 1) (September 2020) policies identified a number of LSEs in relation to the following:

- Potential LSE on the Epping Forest SAC and the Lee Valley SPA/Ramsar due to increased recreational pressures;
- Potential LSE on the Lee Valley SPA/Ramsar relating to the risk of water pollutants entering the European Site;
- Potential LSE on the Lee Valley SPA/Ramsar due to water demand;
- Potential LSE on the Epping Forest SAC and Lee Valley SPA/Ramsar through an increase in traffic and therefore air pollution; and
- Potential LSE on the Epping Forest SAC and Lee Valley SPA/Ramsar from 'urban effects'.

10.2 Appropriate Assessment

The AA stage of HRA has been undertaken to evaluate the potential for the 'screened in' Local Plan (Part 1) policies to result in adverse effects on the European sites as listed above.

10.2.1 Epping Forest SAC

The AA was able to conclude that the Local Plan (Part 1) will not result in adverse effects on the Epping Forest SAC site in relation to water demand and water pollution, both alone and in combination with growth in neighbouring areas.

It was not possible to assess whether there will be a potential effect on the Epping Forest SAC from air pollution at this stage as an air quality study is currently being completed.

It was concluded that the following policies could have an adverse effect on the Epping Forest SAC in relation to potential increases in recreational pressures:

- Spatial Strategy Policies 2, 3, 8, 9, 10, and 11; and
- Thematic Policies 12, 17, 19, 23, 63, 79 and 84.

It was concluded that the following policies could have an adverse effect on the Epping Forest SAC if they resulted in development occurring within 500m of the SAC (urban effects):

- Policies 2, 3, 9, 10, 11, 19 and 86.

10.2.1 Lee Valley SPA and Ramsar

The AA was able to conclude that the Local Plan (Part 1) will not result in adverse effects on the Lee Valley SPA and the Lee Valley Ramsar site in relation to recreational pressures, water demand, water pollution, both alone and in combination with growth in neighbouring areas.

Policy 19: Small Sites could have an adverse effect on the Lee Valley SPA and Ramsar if it resulted in development occurring adjacent to the SPA/Ramsar (urban effects).

10.3 Mitigation Recommendations

10.3.1 Epping Forest SAC

Recreational Pressures

The requirement to implement a mitigation framework to offset the recreational impacts of the Local Plan Part 1 is included within 'Policy 83: The Epping Forest and Epping Forest Special Area of Conservation'.

It is recommended that the wording of Policies 63 and 79 be altered to ensure that any improvements to access routes or green corridors within the borough would not result in adverse effects on the integrity of the Epping Forest SAC.

Urban Effects

The requirement to undertake project level HRA of developments within 500m of the Epping Forest SAC is included within 'Policy 83: The Epping Forest and Epping Forest Special Area of Conservation'. This would ensure that the Local Plan (Part 1) contains a mechanism to protect the Epping Forest SAC from urban effects once further project details are known.

10.3.2 Lee Valley SPA and Ramsar

Policy wording within Policy 84F: The Lee Valley Regional Park would ensure the Local Plan (Part 1) contains a mechanism to protect the Lee Valley SPA and Ramsar from adverse urban effects once further project details are known.

10.4 Overall Conclusions of the HRA

It was not possible to conclude at this stage that there would be no adverse effect on the Epping Forest SAC from air pollution as an air quality study is currently being completed.

Provided that the mitigation recommendations detailed in Section 10.3 are implemented within the Local Plan (Part 1) then it can be concluded that the Plan would **not result in adverse effects on the integrity of Epping Forest SAC in relation to recreational pressures and urban effects when the Plan is assessed on its own.**



However, Epping Forest District Council's Local Plan was found by the Inspector during examination to not currently be sound and requires major modifications before it can be adopted. These modifications include provision of further information in relation to the effects of urbanisation and recreational pressures on the Epping Forest SAC (to be completed in 2020). The recommended policy changes within this AA would ensure that the same issues are not encountered within the Waltham Forest Local Plan as the policy amendments give assurance that approved mitigation strategies would be completed prior to Plan adoption. However, until EFDC provides further information on these effects, it is **not currently possible to conclude no adverse effects on this SAC when the Local Plan (Part 1) is assessed in combination with the EFDC Local Plan.**

The AA was able to conclude that **the Local Plan (Part 1) would not result in adverse effects on the integrity of the Lee Valley SPA and Ramsar, both alone or in combination with growth in neighbouring areas.**

11 Next Steps

This HRA Report is being consulted on alongside the Local Plan (Part 1) Proposed Submission Plan from 00:00 on Monday 26th October to 2359 on Monday 14th December 2020.

The HRA does not include an assessment of increased traffic on the air quality of the Epping Forest SAC as an air quality assessment is ongoing at the time of writing. An addendum to this HRA Report will be published in November 2020 once the results of the air quality assessment are available which will allow the air quality part of the HRA to be concluded. If further information about the Epping Forest District Council Local is available at that time, the in combination effects assessment within the HRA will also be concluded within the addendum.

Table 11.1: Local Plan Next Steps	
Activity	Timeframe
Consultation on Local Plan Part 1 - Regulation 19 Preferred Options (Proposed Submission Plan)	October to December 2020
Consultation comments considered	Q1 2021
Submission	Q1 2021
Examination	Q2 2021
Adoption	Q4 2021

Appendix 1 – Information about European Sites

This appendix presents information about the European sites considered in the Waltham Forest Local Plan Part 1 HRA.

The following tables A1.1-A1.3 present a summary of the site designations, qualifying features and site sensitivities. This information has been obtained from:

- Joint Nature Conservation Committee (JNCC) website www.jncc.gov.uk;
- Multi-Agency Geographical Information Centre (MAGIC) website www.magic.gov.uk;
and
- Natural England site improvement publications.

Table A1.1: Epping Forest SAC	
Name	Epping Forest SAC UK0012720
Location with regards to plan area	The majority of the site occurs to the north of the plan area with the southern part of the site extending into the north and east of the plan area: approximately 3.25 km ² of the site is within the plan area itself.
Reason(s) for designation:	
<p>ANNEX I</p> <p>Primary</p> <ul style="list-style-type: none"> • 9120 Atlantic acidophilous beech forests with <i>Ilex</i> and sometimes also <i>Taxus</i> in the shrub layer (<i>Quercion robori-petraeae</i> or <i>Ilicic-Fagenion</i>) <p>Non Primary</p> <ul style="list-style-type: none"> • 4010 Northern Atlantic wet heaths with <i>Erica tetralix</i> • 4030 European dry heaths <p>ANNEX II species – Primary</p> <ul style="list-style-type: none"> • 1083 Stag beetle <i>Lucanus cervus</i> 	
Component SSSI sites	<ul style="list-style-type: none"> • Epping Forest SSSI
Conservation objectives	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</p> <ul style="list-style-type: none"> • The extent and distribution of qualifying natural habitats and habitats of qualifying species; • The structure and function (including typical species) of qualifying natural habitats; • The structure and function of the habitats of qualifying species; • The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely; • The populations of qualifying species, and, • The distribution of qualifying species within the site.³⁴
Vulnerability and current conditions	

³⁴ Natural England 30 June 2014 – version 2.

<http://publications.naturalengland.org.uk/publication/5908284745711616>

Table A1.1: Epping Forest SAC

Deteriorating air quality and under-grazing are the two key pressures that currently affect the site. While recreational pressure is a considerable impact in some areas, these are localised; however, funding of management on the SAC is governed largely by donation and contributions from the Corporation of London and it is likely that the ability to adequately manage recreation on the SAC will come under increasing pressure as the population of northeast London, Epping Forest and east Hertfordshire increases.

Within the London Borough of Waltham Forest, only one SSSI management unit that underpin the SAC is in favourable condition – some are considered to be recovering from unfavourable status, but others are showing no improvement or are declining. In all cases, poor air quality is cited in the most recent condition assessment process (2010) as a primary factor for this condition. There are localised concerns over recreational pressure, but the condition assessment reports state that the site would be able to withstand this in a more robust manner were it not for the stress imposed by atmospheric pollutants. Under-grazing is also reported as a factor affecting condition in the majority of the management units.

Key factors affecting site integrity and objectives to ensure favourable condition status of the site (relating to conservation objectives)

- Air pollution - ensure no further increase in atmospheric nitrogen deposition, and measures are implemented to control, reduce and ameliorate nitrogen impacts;
- Undergrazing - Maintain appropriate grazing levels;
- Recreational pressure - manage recreational activity within the site;
- Changes in species distribution - Maintain extent and distribution of beech trees by managing beech tree health and beech sapling recruitment;
- Hydrological changes - maintain hydrological conditions within the site;
- Water pollution - ensure water pollutants do not enter the site from surface water run-off from adjacent roads;
- Invasive species - ensure invasive species do not spread i.e. heather beetle and grey squirrel; and
- Disease - ensure disease does not spread within the site i.e. *Phytophthora*³⁵

³⁵ Adapted from Site improvement plan – Epping Forest SAC (Natural England, 2016).
<http://publications.naturalengland.org.uk/publication/6663446854631424>

Table A1.2: Lee Valley SPA	
Name	Lee Valley SPA UK9012111
Location with regards to plan area	The southern part of the Lee Valley SPA (Walthamstow Reservoirs; approximately 1.8km ²) occurs entirely within the plan area with the remaining parts of the SPA occurring to the north of the plan area along a series of wetland and reservoirs within Lee Valley.
Reason(s) for designation:	
<p><u>SPA</u></p> <p>This site qualifies under Article 4.1 of the Directive (79/409/EEC) by supporting populations of European importance of the following species listed on Annex I of the Directive:</p> <p>Over-winter:</p> <ul style="list-style-type: none"> • Bittern <i>Botaurus stellaris</i> 6 individuals representing at least 6.0% of the wintering population in Great Britain (5 year peak mean, 1992/3-1995/6) <p>This site also qualifies under Article 4.2 of the Directive (79/409/EEC) by supporting populations of European importance of the following migratory species:</p> <p>Over-winter;</p> <ul style="list-style-type: none"> • Gadwall <i>Anas strepera</i>, 515 individuals representing at least 1.7% of the wintering Northwestern Europe population (5 year peak mean 1991/2 - 1995/6) • Shoveler <i>Anas clypeata</i>, 748 individuals representing at least 1.9% of the wintering Northwestern/Central Europe population (5 year peak mean 1991/2 - 1995/6) <p><u>Ramsar</u></p> <p>Criterion 2: A wetland should be considered internationally important if it supports vulnerable, endangered, or critically endangered species or threatened ecological communities. The site supports the nationally scarce plant species whorled water-milfoil <i>Myriophyllum verticillatum</i> and the rare or vulnerable invertebrate <i>Micronecta minutissima</i> (a water-boatman).</p> <p>Criterion 6: A wetland should be considered internationally important if it regularly supports 1% of the individuals in a population of one species or subspecies of waterbird.</p> <p>Species with peak counts in spring/autumn:</p> <ul style="list-style-type: none"> • Shoveler <i>Anas clypeata</i>, 287 individuals, representing an average of 1.9% of the GB population (5 year peak mean 1998/9-2002/3) <p>Species with peak counts in winter:</p> <ul style="list-style-type: none"> • Gadwall <i>Anas strepera</i>, 445 individuals, representing an average of 2.6% of the GB population (5 year peak mean 1998/9- 2002/3) 	

Table A1.2: Lee Valley SPA	
Component SSSI sites	<ul style="list-style-type: none"> • Walthamstow Reservoirs SSSI • Amwell Quarry SSSI • Rye Meads SSSI • Turnford and Cheshunt Pits SSSI
Conservation objectives for the SPA	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring:</p> <ul style="list-style-type: none"> • The extent and distribution of the habitats of the qualifying features; • The structure and function of the habitats of the qualifying features; • The supporting processes on which the habitats of the qualifying features rely; • The population of each of the qualifying features, and • The distribution of the qualifying features within the site.³⁶
<p>Vulnerability and current condition</p> <p>The Information Sheet on Ramsar Wetlands³⁷, states that ‘the whole site supports high levels of visitor pressure; principally for purposes of angling, walking, cycling and birdwatching; with boating on the adjacent canal. These activities are mostly well regulated and at current levels are not considered to threaten the interest’.</p> <p>During the most recent condition assessment of the SSSI units that underpin the SPA/Ramsar site (2014), the Walthamstow reservoirs were listed as recovering from unfavourable condition. The assessment noted that ‘Wintering cormorant, tufted duck and shoveler counts, and breeding pochard and tufted duck numbers, were all assessed as favourable against the baseline data. Breeding heron numbers continue to fail the minimum threshold, but this is not considered to be a result of detrimental site management. The underlying causes are being investigated.’</p> <p>There is also a potential problem from over-extraction of surface water for public supply, particularly during periods of drought.</p>	
<p>Key factors affecting site integrity and objectives to ensure favourable condition status of the site (relating to conservation objectives)</p>	
<ul style="list-style-type: none"> • Water pollution - ensure water pollutants do not enter the site and nutrient enrichment is limited; 	

³⁶ <http://publications.naturalengland.org.uk/publication/5670650798669824>

³⁷ <http://jncc.defra.gov.uk/pdf/RIS/UK11034.pdf>

Table A1.2: Lee Valley SPA

- Hydrological changes - maintain hydrological conditions within the site with consistent freshwater flows and volumes;
- Recreational pressure - manage recreational activities in sensitive locations;
- Inappropriate scrub control - maintain appropriate scrub management;
- Fisheries - maintain appropriate fish species and population levels to ensure suitable food and water quality is maintained for designated features;
- Invasive species - ensure invasive species do not spread, particularly *Azolla* and invasive aquatic blanket weeds;
- Inappropriate cutting/mowing - maintain appropriate cutting/mowing regime for reedbed; and
- Air pollution - ensure no further increase in atmospheric nitrogen deposition.³⁸

³⁸ Adapted from Site Improvement Plan – Lee Valley SPA (Natural England, 2014)
<http://publications.naturalengland.org.uk/publication/5864999960444928>

Table A1.3: Wormley Hoddesdonpark Wood SAC	
Name	Wormley Hoddesdonpark Woods SAC UK0013696
Location with regards to plan area	The site occurs approximately 10.6km to the north west of the plan area.
Reason(s) for designation:	
ANNEX 1 habitats: Primary: 9160 Sub-Atlantic and medio-European oak or oak-hornbeam forests of the <i>Carpinion betuli</i> .	
SSSI component sites	<ul style="list-style-type: none"> • Wormley-Hoddesdonpark Wood North • Wormley-Hoddesdonpark Wood South
Conservation objectives	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</p> <ul style="list-style-type: none"> • The extent and distribution of qualifying natural habitats; • The structure and function (including typical species) of qualifying natural habitats; and • The supporting processes on which qualifying natural habitats rely.³⁹
Vulnerability and current conditions	
<p>The majority of the woods in the complex are in sympathetic ownership with no direct threat (Hoddesdon Park Wood, for example, is managed by the Woodland Trust). There is some pressure from informal recreation, and there has been limited damage in the past (for example from four-wheel drive vehicles). However, most recreation is concentrated on well-established paths. Most of the complex is covered by a High Forest Zone Plan (Hertfordshire County Council 1996) which sets out a framework for woodland management across the whole area. It aims to restore a varied age structure and natural stand types through sustainable forestry. There have been some instances of fly-tipping in the recent past, and this does increase the risk on non-native species, such as cherry laurel and privet from garden waste. Coupled with instances of car dumping, this does indicate that the site attracts some urbanisation pressures.</p> <p>During the most recent condition assessment of the SSSI units (2010 and 2012), the majority of the SSSI units within the site were in favourable condition, with the remaining units in unfavourable recovering condition primarily due to management activities, although there is also reference to the fly tipping within this unit.</p>	

³⁹ Natural England 30 June 2014 – version 2.

<http://publications.naturalengland.org.uk/publication/4919819195383808>

Table A1.3: Wormley Hoddesdonpark Wood SAC

Key factors affecting site integrity and objectives to ensure favourable condition status of the site (relating to conservation objectives)

- Disease - ensure disease does not spread within the woodland. Acute Oak Decline is present in at least two parts of the site and affects both native oak species;
- Invasive species - ensure invasive species do not spread. Invasive species currently within the site include sycamore, turkey oak, rhododendron and snowberry;
- Air pollution - ensure no further increase in atmospheric nitrogen deposition;
- Deer - minimise deer browsing within the woodland;
- Vehicles - ensure no further fly tipping occurs within the site and illegal vehicles are not used within the site;
- Woodland management - ensure appropriate woodland management continues within the site; and
- Recreational pressures - maintain visitor management practices and review monitoring regularly and change management to adapt to changes in visitor activity.⁴⁰

⁴⁰ Adapted from Site Improvement Plan – Wormsley Hoddesdonpark Wood (Natural England, 2015)
<http://publications.naturalengland.org.uk/publication/6314181103976448>



Appendix 2 - Details of Neighbouring Plans for In Combination Effects Assessments

This appendix presents information about the development plans of neighbouring local authorities to the London Borough of Waltham Forest which have been considered in the in combination effects assessment of the Waltham Forest Local Plan Part 1 HRA.

The following Tables A2.1 presents a summary of the growth planned in neighbouring areas and any relevant policies within their development plans. References for the sources of information are provided in footnotes.

Table A2.1 Details of Neighbouring Plans for In Combination Effects Assessments	
Local Authority	Proposed Growth
London Borough of Enfield	<p>A new Local Plan is being prepared and reviewed in response to consultation comments received between December 2018 and February 2019. It is predicted that Enfield's population could exceed 400,000 by 2032.</p> <p>The extant Core Strategy⁴¹ plans for growth concentrated in town centres and on previously developed land in the south and east of the Borough. Up to 2026 the plan aims to deliver approximately 11,000 new homes and the number of jobs will increase by a minimum of 6,000. Large scale growth and regeneration will be focused in four broad locations - Central Leaside and North East Enfield in the Upper Lee Valley, the area around the North Circular Road at New Southgate and the Borough's major town centre - Enfield Town.</p> <p>The strategic objectives for Enfield are to strengthen retail, public services and employment, protecting biodiversity, reducing the borough's carbon footprint, enhancing quality of life and living environments and reducing the need to travel, all of which are likely to result in sustainability positive effects.</p>
Haringey	<p>Strategic Policies were adopted by the council in 2013, to replace the Unitary Development Plan (UDP), with subsequent alterations adopted on the 24 July 2017⁴². The plan aims to deliver a minimum 19,800 net new homes over the plan period to 2026. The Council's overall strategy for managing future growth in Haringey is to promote the provision of homes, jobs and other facilities in the areas with significant redevelopment opportunities at, or near, transportation hubs, and support appropriate development at other accessible locations, with more limited change elsewhere.</p> <p>The Tottenham Hale Area of Growth is located to the east of the borough, close to the Lee Valley Regional Park and the boundary with Waltham Forest.</p>

⁴¹ The Enfield Plan Core Strategy 2010-2025 Adopted November 2010

⁴² Haringey's Local Plan 2013 – 2026 (formerly the Core Strategy) March 2013 consolidated with alterations since 2017

Table A2.1 Details of Neighbouring Plans for In Combination Effects Assessments	
Local Authority	Proposed Growth
London Borough of Hackney	On 22 July 2020, the Hackney Local Plan 2033 was adopted. The Local Plan includes an objective to deliver up to 26,250 additional homes and 23,000 new jobs. Mixed used development with residential, employment, retail, leisure and community facilities will be focused in the designated town centres of Dalston and Hackney Central, and in Shoreditch (none of which are close to the boundary with Waltham Forest). New office development will be directed to the most sustainable locations in the Borough, including within the City Fringe Opportunity Area and the borough's Town Centres to support Hackney's economy. Mixed used, housing led development will be encouraged along the borough's key corridors (including Lea Valley Edge which borders Waltham Forest). This development is intended to deliver improvements to the public realm, new community facilities and other measures that promote healthy streets that easily link different neighbourhoods, open spaces public transport hubs, and civic areas by walking and cycling.
London Borough of Newham	The Newham Local Plan was adopted in December 2018 to replace the previous Core Strategy and Detailed Sites and policies Development Plan Document. The new plan covers a 15year period to 2033 ⁴³ . The Local Plan aims to deliver a minimum of 43,00 new homes by 2033, as well as up to 60,000 new jobs. Development of high density, mixed use and sustainable in terms of location and design are encouraged throughout Newham, but particularly in the following strategic locations: <ul style="list-style-type: none"> • Stratford and West Ham • Royal Docks • Canning Town and Custom House • Beckton (a) Urban Newham
London Borough of Redbridge	The Redbridge Local Plan was adopted in March 2018. It aims to deliver up to 17,237 new homes across the borough ⁴⁴ . The Local Plan directs new development including new homes, shops, businesses, leisure facilities and infrastructure to:

⁴³ Newham Local Plan, 2018-2033, adopted December 2018

⁴⁴ Redbridge Local Plan 2015 - 2030

Table A2.1 Details of Neighbouring Plans for In Combination Effects Assessments	
Local Authority	Proposed Growth
	<p>(a) The borough's Investment and Growth Areas of: i Ilford; ii Crossrail Corridor; iii Gants Hill; iv South Woodford; and v Barkingside.</p> <p>(b) The borough's main town centres.</p> <p>(c) Other identified Opportunity Sites.</p> <p>The objectives of the Local Plan include increasing energy efficiency, encouraging sustainable patterns of transport, improving access to employment, supporting the strategic industrial Locations in the borough, and protecting conditions for biodiversity.</p>
Epping Forest District	<p>The adopted Local Plan is dated 2006. An updated Local Plan has been prepared for the period 2011-2033 (Submission version dated December 2017) which made provision for a minimum of 11,400 new homes through:</p> <ul style="list-style-type: none"> • The creation of Garden Town Communities around Harlow; • Development of previously developed land and some open space land within existing settlements; • Development of previously developed land within the Green Belt; Greenfield/Green Belt land on the edge of settlements; • Development of some grades of agricultural land; and • Development of some smaller sites in rural communities. <p>Most development is to be directed to Harlow (circa 3,900 new homes), followed by Epping (1305), Loughton (1021), Waltham Abbey (858) and North Weald Basset (1050).</p> <p>Following examination, the Inspectors report (dated 2nd August 2019) concluded that the Local Plan is not currently sound and requires further major modifications before it can be accepted. Issues include air quality and recreation/urbanisation effects on Epping Forest SAC identified within the plan HRA which require further investigation and mitigation.</p>
The London Plan, 2019 (intend to publish version)	<p>The London Plan recognises the deprivation within Waltham Forest, and clearly sets out strategy to deal with this. For example, the London Legacy Development Corporation (LLDC), which involves several local authorities having a coordinated response to issues in the area surrounding the Queen Elizabeth Olympic Park.</p>

Table A2.1 Details of Neighbouring Plans for In Combination Effects Assessments	
Local Authority	Proposed Growth
Harlow District Council	A new Local Plan is currently being prepared. The Pre-Submission Publication Local Plan May 2018 which makes provision for 9,200 dwellings. Modifications of the Plan is currently being undertaken following examination.
East Hertfordshire District Council	The Local Plan was adopted 2018 and covers the period 2011-2033. The plan makes provision for 18,458 dwellings.
Uttlesford District Council	A new Local Plan is currently being prepared and is at an early stage. Councillors decided to withdraw the draft Uttlesford Local Plan 2019 and start a new plan at an Extraordinary Council Meeting on Thursday 30 April 2020.
Broxbourne Borough Council	A new Local Plan was adopted on Tuesday 23 June 2020. The Local Plan guides development up to 2033 and makes provision for over 7,700 new homes.
Brentwood Borough Council	A Local Plan 2016-2033 (dated 2019) was submitted for examination. The plan makes provision for 7,752 new homes during the plan period.
London Borough of Tower Hamlets	The Local Plan which guides development until 2031 was adopted in January 2020 and makes provision for at least 58,965 new homes.
London Borough of Barking and Dagenham	A new Local Plan is being developed. Consultation on a Regulation 19 Local Plan closes on 29 November 2020. The Council will support the development of 50,000 new homes and 20,000 new jobs across the borough. This will be largely achieved through intensification and redistribution of the borough's industrial floor space and complementary commercial uses.