



‘Shaping the Borough’ - Waltham Forest Local Plan (LP1) Examination

Response to the Inspectors’ Preliminary Matters

(3) Conservation of Habitats and Species – HRA Topic Paper

August 2021

1. Introduction

- 1.1 London Borough of Waltham Forest (LBWF) Council has been asked to prepare a topic paper to clarify the approach to the Habitats Regulations and the evidence to that approach addressing a number of points raised by the Inspector. This paper is intended to address the Inspector's questions as follows:
- 1.2 **Inspectors' Question 1:** *The conclusion of the HRA (April 2021) that the plan would not result in adverse effects on the integrity of the Epping Forest SAC alone or in combination with other plans and projects arising from recreation pressure and air quality impacts is dependent on a number of mitigation measures. What is the most up to date position in relation to the preparation of a Strategic Access Monitoring and Management Strategy (SAMMS), A Suitable Alternative Natural Greenspace Strategy (SANGS) and Air Quality Mitigation Strategy, all of which are proposed to be included in a 'Mitigation the Impact of Development on the SAC' Supplementary Planning Document (SPD)?*
- 1.3 **Inspectors' Question 2:** *The AA Executive Summary indicates that the conclusion of no adverse effects on the completion of Epping Forest District Council's SANG Strategy, prepared during the examination of the Epping Forest Local Plan. Have any further meetings or cooperation taken place with EFDC in response to their letter dated 1 December 2020, which indicated that they would wish to make further representations including on the spatial strategy set out in LP1 pending further evidence in relation to atmospheric pollution? If so, further details should be provided including any agreed actions or outcomes.*
- 1.4 **Inspectors' Question 3:** *What are the views of NE on the April 2021 version of the HRA (KD5.1), particularly with regards to the Epping Forest SAC? Comments received from NE should be published on the examination website.*
- 1.5 **Inspectors' Question 4:** *How does the content of the letter from NE dated 5 March 2021, which refers to the need to for Strategic Solution for SAMM and SANG, related to the HRA and the proposed approach in LP1 (KD1)? What are the implications of this for the plan's approach to mitigating the impact of development on the integrity of the SAC from recreational pressure?*
- 1.6 **Inspectors' Question 5:** *While the submitted plan does not include site allocations, a number of proposed SANG sites are shown in Figure 5.1 of the AA within the HRA (KD5.1). What would these SANG sites be expected to contribute, are they deliverable, what effect would their delivery have on development viability and the deliverability of the plan's spatial and growth strategy? What degree of certainty is there that the proposed mitigation measures would be effective?*
- 1.7 The remainder of this paper provides an update on progress in the following areas:
 - 2) Approach to the HRA
 - 3) Progress Update on Mitigation Strategies
 - 4) Liaison with Epping Forest District Council
 - 5) Natural England's Response to the HRA Report April 2021
 - 6) Addressing Natural England's letter dated 5 March 2021

7) Delivery of SANG sites

2. Approach to the HRA

- 2.1 The Local Plan Part 1 (LP1) has been subject to a Habitats Regulations Assessment (HRA) prepared by consultants ClearLead Consulting Ltd who have a qualified ecologist in their team. The HRA commenced in 2017 with consultation with Natural England on the scope of the HRA. Natural England were in agreement and have been engaged with throughout the HRA process which has kept pace with the development of LP1. An HRA is being undertaken of LP2 by the same consultant team.
- 2.2 Spatial options were subject to HRA screening in 2018 and the draft plan was screened in 2019. Screening identified that the LP1 could result in some potential adverse effects on three European sites (Epping Forest SAC, Lee Valley Special Protection Area (SPA) and the Lee Valley Ramsar site, and Wormley-Hoddesdon Park Woods SAC. The HRA process advanced to the Appropriate Assessment (AA) stage where detailed assessments of the potential effects of the plan have been undertaken. A number of potential effects were ruled out during the AA stage with mitigation put in place in plan policy wording. However, two potential effects have required separate mitigation strategies to be developed due to the nature of the potential effects. These potential effects are:
 - 1) Potential increase in air pollution resulting from traffic generated by the LP1 growth proposed in combination with growth in neighbouring area. A potential increase in air pollution could have a detrimental effect on the integrity of Epping Forest SAC.
 - 2) Potential increase in recreational pressure and from increase population from growth in the LP1 which could have a detrimental effect on the integrity of Epping Forest SAC.
- 2.3 Work on the mitigation strategies to help address these potential effects was underway by the consultants at the time of LP1 submission.

3. Progress Update on Mitigation Strategies

Air Quality Mitigation Strategy

- 3.1 An Air Quality Mitigation Strategy has been prepared by consultants and provided to Natural England and the City of London Conservators of Epping Forest for their comment.
- 3.2 The HRA of the Waltham Forest Local Plan Part 1 (LP1) identified a potential rise in air pollution which could result from growth within the London Borough of Waltham Forest. The Air Quality Mitigation Strategy sets out measures to address a potential increase in air pollution. In support of the HRA, an air quality impact assessment undertaken by Kairus Ltd (April 2021) has identified that critical loads for NH₃, nutrient nitrogen and acid deposition for habitats near to roads which pass through Epping Forest SAC could be exceeded in the future resulting from growth proposed within the Waltham Forest LP1 and surrounding areas.

- 3.3 The measures set out within the strategy will help to avoid exceedances of critical loads from occurring. The measures include schemes which are already underway to facilitate more walking, cycling and use of public transport within the Borough, and increased use of electric vehicles. These measures will also be implemented through strong LP1 policies which require car free and air quality neutral developments and contributions towards public transport and active travel infrastructure.
- 3.4 Air quality sensitivity modelling has been undertaken using the same methodology as the air quality impact assessment. Justified assumptions have been made as to the anticipated reduction in petrol and diesel fuelled road transport over the LP1 plan period. It has been concluded that a reduction of 30% in traffic can be expected by 2030 resulting from the mitigation measures identified and modelling shows that this reduction will result in no significant impacts on Epping Forest SAC from air pollution resulting from the growth proposed in Waltham Forest LP1.
- 3.5 In addition to measures already underway and the policies within LP1, it is recommended that Construction Logistics Plan for developments within Waltham Forest Borough seek to avoid routes which pass within 200m of Epping Forest SAC as far as possible.
- 3.6 When the next version of the Waltham Forest Air Quality Action Plan¹ is prepared by the Council, it is recommended that consideration is given to how that action plan (which relates to air quality impacts on human health) can also integrate measures for the Epping Forest SAC in line with the Waltham Forest Local Plan Part 1 HRA Air Quality Mitigation Strategy (Draft, 7 July 2021).
- 3.7 It is also recommended that the London Borough of Waltham Forest Council works in partnership with Natural England, the City of London Conservators of Epping Forest, and neighbouring authorities on the delivery and monitoring of the LP1 HRA Air Quality Mitigation Strategy.
- 3.8 Monitoring of traffic levels, traffic composition and air pollution deposition is proposed in order to understand the effectiveness of the mitigation measures over the coming years. In order to monitor air pollution deposition affecting Epping Forest SAC, monitoring is recommended near to roads which are located within Epping Forest District.
- 3.9 The air quality impact assessment was informed by traffic modelling obtained from the TfL. The LoHAM (London Highway Assignment Model), a strategic model representing routeing and congestion of motorised highway trips using London's highway network and analysed by transport consultants Awcock Ward Partnership. The LoHAM traffic data is the best data available for this exercise, but the base year is 2016 and it is therefore recognised as being outdated and therefore does not reflect recent improvements to modal shift recorded within Waltham Forest. It is understood that LoHAM is currently being integrated as part of the MoTioN (Model of Travel in London)

¹ London Borough of Waltham Forest Air Quality Action Plan 2018-2023 (Annual Status Report 2020 update)
<https://www.walthamforest.gov.uk/content/air-quality>

suite of travel modelling software². When this is available it is anticipated that MoTioN will provide more up to date traffic predictions for LBWF and surrounding areas.

- 3.10 The LP1 HRA Air Quality Mitigation Strategy does not currently have a date for review. A review would be triggered by the findings of monitoring or a review of the Waltham Forest LP1 which may occur within the next 5 years. A review of the Air Quality Mitigation Strategy would ensure that mitigation addresses up to date predicted effects on air quality using the MoTioN model from growth proposed within Waltham Forest and surrounding areas.
- 3.11 The strategy references measures that the City of London Conservators of Epping Forest are putting in place such as a new car parking strategy. It also references the Epping Forest District Council Local Plan HRA Interim Air Pollution Mitigation Strategy³ which includes the option to implement a clean air zone to cover parts of the Epping Forest SAC. This is in addition to a package of mitigation measures which include the encouragement of EV charging point installation in Council owned carparks and in new development; route management strategies and walking and cycling campaigns (Appendix 3). The mitigation measures included within the Epping Forest Interim Air Pollution Mitigation Strategy are not under the control of Waltham Forest Borough Council and therefore, with respect to the precautionary principle, the Air Quality Mitigation Strategy for the Waltham Forest Local Plan HRA has not modelled the potential effect of the clean air zone and does not rely upon it to achieve the required reduction in air pollution from growth within Waltham Forest that the HRA requires in order to avoid a potential adverse effect on Epping Forest SAC from growth within LP1.
- 3.12 Natural England responded on 14th July 2021 to the draft Air Quality Mitigation Strategy and have stated that it is satisfied with the model but has raised a number of questions for clarification before they can confirm that the strategy mitigates for the potential effect in relation to air pollution on Epping Forest SAC. The details requested include visual representation of modelling, assessment of ammonia in relation to other pollutants, the extent of the area of pollution, and the location of receptors in relation to roadside and habitats. Natural England has also made some further suggestions to improve the robustness and the level of detail within the strategy. Further work is now being conducted.

Suitable Alternative Natural Greenspace (SANG) Strategy

- 3.13 ClearLead Consulting Ltd have been developing a SANG strategy for Waltham Forest in support of the LP1 and to support the conclusions of its HRA. The consultant team has been working closely with planning policy officers and engagement has been undertaken with Natural England and City of London representatives on potential SANG sites, the content of the strategy, and how the SANGs could be implemented alongside City of London future plans. Natural England have expressed that they are happy with the level of engagement to date and are seeking to cooperate with LBWF council on the preparation of the SANG strategy. It is the first of its kind in a London borough.

² MoTioN is a multi-model strategic transport model of London and the surrounding area. MoTioN can model how many trips there are likely to be, their origins and destinations and their modes of transport.

³ Epping Forest District Council (December 2020) Epping Forest Interim Air Pollution Mitigation Strategy: Managing the Effects of Air Pollution on the Epping Forest Special Area of Conservation

3.14 The SANG Strategy will ensure that SANGs will be delivered alongside housing development in order to mitigate for increased recreational pressures on Epping Forest SAC. The strategy would focus on linking proposed SANGs with other existing green infrastructure away from Epping Forest SAC to provide a network of sites. The strategy would aim to provide a scheme that provides attractive alternative open spaces to Epping Forest SAC. A framework for the SANG Strategy is provided in Table 1 below which also shows progress against each element of the strategy.

Table 1: Framework for the SANG Strategy		
Details to be included within the Strategy	Description	Progress
A detailed plan of each SANG site within the borough showing the existing use of the proposed SANG, including information on the existing nature conservation interest of the site and any other constraints.	The proposed SANGs identified to date are on either new semi-natural open space or existing open space with access improvements.	14 potential SANG sites so far identified. Work is ongoing.
A costed schedule of proposed works to improve each site thereby increasing its capacity for recreation by enhancing the visitor experience.	Details of how each SANG will be enhanced to increase visitor capacity would be undertaken in accordance with the Guidelines for the Creation of Suitable Accessible Natural Greenspace (Natural England, 2008 or subsequent version). This document sets out what each SANGs should have in order to make them attractive to visitors and would guide the design of the SANG.	A master list of capital costs is being developed for approval with LBWF Parks and LVRPA contacts
Details of the types and size of each SANGs and what experience they would provide.	The strategy would aim to provide a range of types and sizes of SANG, offering a range of experiences, including larger SANG with café facilities (i.e. honey pot sites), dog training areas and possible bike parks.	In progress
Details on proposed biodiversity enhancements within the SANGs.	There is an opportunity to tie this in with the Local Plan requirement for developments to result in Biodiversity Net Gain.	In progress
An indication of current visitor levels within the sites and, where appropriate, the degree of	Level of visitor survey required to be confirmed following consultation with Natural England.	In progress

Table 1: Framework for the SANG Strategy		
Details to be included within the Strategy	Description	Progress
discounting applied to reflect this (particularly in areas of existing open space to be enhanced).		
A plan showing how each SANG will be linked to other SANGs or existing greenspace within the borough to provide a network of alternative sites.	This will focus on footpaths that do not link with the SAC.	In progress
Details of the requirement for bespoke wardening to manage visitor engagement on SANGs and other green spaces in the borough.	This is an area of potential crossover with the SAMMS work being undertaken with the Oversight Group	In progress
The location and number of dwellings each SANG could provide avoidance/mitigation for.	The Mitigations SPD will set out the proportion of the SANG network assigned to each Site Allocation.	To be addressed as part of the Local Plan Part 2 HRA
Assurance that sufficient SANG is provided in advance of occupancy of residential developments.	Further details also to be provided within the associated SPD.	To be confirmed once more SANG sites are advanced
An indication of the funding mechanism for the creation and management of the SANG in-perpetuity and who would be responsible for the management of each SANG.	Full details to be provided within the associated SPD.	In progress
Implementation and monitoring to ensure that the sites are delivered, and measures taken to promote the SANGS as alternatives to EF SAC.	Details will be provided in SPD of how development will contribute to the provision and promotion of alternative green spaces.	In progress.

3.15 The development of the SANG strategy is following a stepped approach:

- Step 1: Identify potential SANG sites within the borough.
- Step 2: Undertake site visits to identify whether potential SANG sites meet the Natural England SANG checklist criteria.
- Step 3: Identify additionality needed to enhance a site to meet SANGS criteria, for example:
 - planting
 - circular walk
 - seating
 - interpretation boards
 - new access routes from nearby housing
- Step 4: For any sites not in LBWF ownership, contact owners and obtain their agreement in principle to use the site as SANGs.
- Step 5: Calculate uplift to show how many new residents a site would provide SANGs for.
- Step 6: Prepare plans showing the additionality / enhancements to be added to each site, access points.
- Step 7: identify a list of costs towards which developers will contribute towards creating the SANGs and maintaining them in perpetuity.

3.16 An initial 12 potential SANG sites were identified, as shown on Figure 5.1 of the HRA Report (April 2021). Site visits were undertaken in April 2021 and attended by representatives of the ClearLead Consulting team, LBWF planning policy officers, Natural England and the City of London, along with further discussions, one site was identified as less suitable and has not been taken forward for further consideration. This site is the Peter May Sports Centre but there is potential for the site to be considered again at a later date. Lloyd Park has already been identified for SANGs provision for a development which is coming forward ahead of LP1 and the Local Plan therefore counts towards overall SANG totals. It will continue to be included within the SANG strategy but does not need any further SANG design work as this is being undertaken by the developer in consultation with Natural England the LBWF. Sites 9 and 10 were combined into one site as they were adjacent to each other (Walthamstow Marshes).

3.17 A landscape architect and the ecologist then returned to the remaining sites to identified habitats on site and to start to develop designs for the sites to enhance them for recreation. The draft plans indicated within this paper are those which it has been so far possible to be drafted by the landscape architect. Some remaining sites are subject to queries relating to boundaries and ownership and have not been progressed as far. Sites 13 and 14 have recently been identified and are currently being investigated for potential to be included within the strategy. Some of the potential SANGs sites are owned by LBWF however a number are owned by the Lee Valley Regional Park Authority (LVRPA), Thames Water and London Legacy Corporation. LBWF are liaising with these site owners to obtain agreement in principle for their sites to be included within the SANG strategy.

3.18 The 14 potential SANG sites over 2ha are shown on Figure 1 below.

3.19 Natural England has indicated that owing to the acknowledged urban constraints of the borough that it is prepared to adopt a relatively flexible approach to provision, in which

the quality of any space and the degree of potential uplift needed will be factors for consideration.

- 3.20 Work undertaken so far on the SANG Strategy has reached the stage of identifying landowners and further work and liaison with third party site owners is needed over the coming months in order to identify further proposed SANG sites. This exercise can include potential SANG sites beyond the boundary of LBWF and there may be some potential for cross boundary cooperation particularly with Redbridge and Enfield Borough Council Epping Forest District Council and the LVRPA.

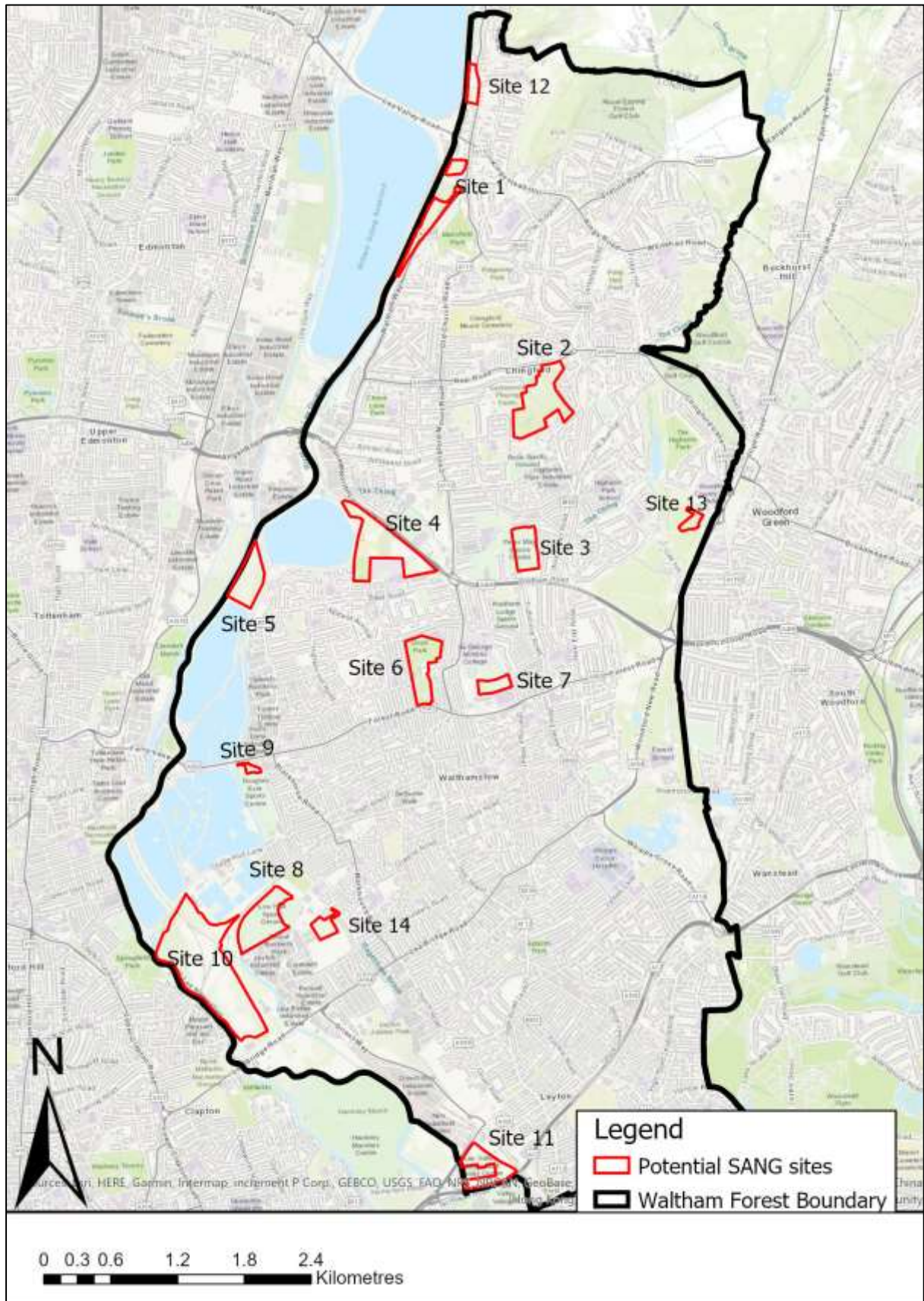


Figure 1: Potential SANGs sites within London Borough of Waltham Forest

- 3.21 The ClearLead Consulting team are currently developing a set of capital costs for the enhancement infrastructure and works required to provide additionality on the SANGS sites. These costs are being consulted on with the LVRPA and the LBWF Parks department for their feedback based on their knowledge of similar works undertaken within the borough and nearby.
- 3.22 Natural England have advised that the strategy should look outside of the LBWF boundary to tie in with SANGs and existing publicly accessible greenspace in neighbouring areas and this is something which is currently being developed.
- 3.23 Once remaining ownership and boundary queries for the other four sites have been resolved, the SANG Strategy can be completed which will identify costs associated with creating each SANGs site, how each site will be managed in perpetuity, how many hectares of SANG the strategy can provide in total across the borough and how that relates to the expected population increased that could result from LP1. It is intended that once the LP2 allocations are confirmed, SANG sites can be matched with allocations within LP2 to identify which allocations the SANG sites will support. This approach develops on an interim SANGS strategy that was developed for the delivery of the Leyton and Lea Bridge SANGS area which comprises Leyton Jubilee Park, Ive Farm and the area around the Dagenham Brook. This bespoke strategy is attached at Appendix B.

Strategic Access Monitoring and Management Strategy (SAMMS)

- 3.24 The proposed costed SAMM provides part of a strategic solution for the management of recreational pressures experienced within the SAC. The SAMM includes measures to manage recreational pressures by encouraging users to use designated routes/areas away from sensitive parts of the Forest and monitor visitor impacts on SAC features to guide visitor management. These costings have been laid out in terms of whole forest SAMM Mitigation Measures, with a 25 year total of £17,121,594 and an in perpetuity total (125yrs) of £62,626,158. The Corporation of London considers these mitigation measures to be essential to the protection of Epping Forest SAC.
- 3.25 The SAMM is going through a number of processes and it has not yet been agreed by the members of the Epping Forest SAC Oversight Group. The group has accepted the general principle that it will be constituted in a similar form to that of the Essex Coast Recreational disturbance Avoidance & Mitigation Strategy (RAMS). Natural England are facilitating the development of the agreement and the individual parties are obtaining their own advice on group governance. In addition, NE and the parties are working through the Finance Group with the Conservators of Epping Forest on developing an agreed SAMMS programme. The participating authorities will be collecting contributions to fund this programme through planning obligations on new development. The level of borough contribution is determined by the percentage of its residents visiting key sites in Epping Forest as measured at periodic visitor surveys funded by the participant authorities.

4. Liaison with Epping Forest District Council

- 4.1 An Air Quality Mitigation Strategy has been prepared and consulted on with Natural England and the City of London Conservators of Epping Forest. Natural England has so far responded and asked for some further details and further work is taking place to address this. Once the strategy is revised it will be sent to EFDC for their comments to provide them with the information they wish to see in relation to the HRA.

- 4.2 Between March and April 2021, ClearLead Consulting Ltd made contact with AECOM consultants who prepared the HRA of the Epping Forest District Council Local Plan. Correspondence covered traffic data used, and assumptions made in the air quality work undertaken by AECOM. Arrangements between the two councils would need to be made for any data to be shared, should it be deemed necessary for the Waltham Forest Local Plan HRA.
- 4.3 LBWF has been an active partner with EFDC in the Oversight Group since 2018 and is in the process of drawing up a statement of common ground with EFDC as both authorities are committed to the preservation of the SAC and the wider Epping Forest. Both LPAs are looking to find ways of cross boundary working to mitigate adverse impacts where they occur and to preserve and improve the general Forest ecology and habitat.

5. Natural England's Response to the HRA Report April 2021

- 5.1 Natural England has provided a response to the HRA Report April 2021 which accompanied the Submission LP1. The letter is provided in Appendix A and will be published on the LBWF examination website.

6. Addressing Natural England's letter dated 5 March 2021

- 6.1 Natural England has produced an interim advice note on the Emerging Strategic Mitigation Strategy for the Epping Forest SAC (Natural England, 6th March 2019) and updated by their advice contained within the Natural England letter dated 5th March 2021⁴.
- 6.2 Natural England's letter of 5th March 2021 sets out Natural England's concept of progressing a strategic solution to SAC mitigation and the core participants in the solution are identified in the letter. Natural England's aim is for the boroughs to deliver high quality SANGS, co-ordinated as a strategic solution to avoid impacts prior to considering mitigation or compensation.
- 6.3 The HRA of LP1 is in line with the advice provided by Natural England in both the 2019 and 2021 advice letters. The Natural England advice is that all residential development within 3km of the Epping Forest SAC and all development with 100 or more dwellings within 6.2km of the SAC should 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. Information regarding the status of the SAMM is provided above.
- 6.4 Natural England also advise that residential development with 100 or more dwellings within 6.2km of the Epping Forest SAC should provide additional mitigation to offset recreational impacts on Epping Forest SAC. Natural England has set out a 'Toolbox Approach' to mitigation. The list of items that Natural England would find acceptable as part of the package of mitigation measures includes the following:
- 1) "Traditional SANG, meeting the 8ha minimum standard, meeting the guidelines.

⁴ Natural England Developments to the Strategic Approach relating to the Epping Forest SAC Mitigation Strategy (March 2021). Letter to the Epping Forest SAC Oversight Group. Aidan Lonergan.

- 2) SANG networks, either not meeting the standard, or all of the traditional guidelines, but does provide a semi natural experience of a size greater than 2ha for the local populous
- 3) Strategic SANG, as discussed above provided by a third party. Options to look at areas such as Olympic Park or Hackney Marshes.
- 4) SAMM+ Contribution, directly funding a significant project from the City of London's proposed complete solution. Reducing the overall requirement strategically, but dealing with a likely acute development issue, due to size of development or proximity to the SAC.
- 5) Offsite Public Rights of Way improvements away from the SAC. Provides an opportunity to improve accessibility to current green spaces in the London Boroughs from the new developments and beyond.
- 6) Bespoke Wardens provided to manage visitor engagement on SANGs [and] other green spaces in the Boroughs.
- 7) A new Education Centre / Facility focused on managing behaviours at the SAC.
- 8) Dog Training Areas on the site somewhere, small fenced areas where people could train their dogs, recall etc, without being on the SAC.
- 9) Contributions to other Green Infrastructure in the vicinity (improvements to accessibility or biodiversity on them), such as opening up areas of green, removing culverts on river sections, extra habitat planting or riverside walks.
- 10) Contribution to the City of London for something else outside of the SAMM project requirements.
- 11) Pet Covenants on developments to ban keeping of dogs.
- 12) Reduce access to the SAC from any particular development with physical barriers; and
- 13) Secure measures to provide garden waste provision on site, to protect garden refuse or fly tipping on the SAC, where gardens are part of the application.

6.5 As discussed above, a SANG Strategy is currently being prepared by the LBWF to offset recreational effects on Epping Forest SAC from growth proposed in LP1. The SANG Strategy will provide a package of mitigation measures based on Natural England's 'Toolbox Approach' and responds to bullet points 2, 3, 4 and 5 in the above list, set out within the letter dated 5th March 2021.

6.6 The LP2 HRA will also set out additional mitigation measures for sites that may be allocated close to the SAC. In these instances, developments would be required to provide a 'SAMM+' contribution in line with Natural England's Toolbox Approach to directly fund a significant project from the City of London's proposed complete solution (refer to Section 9: Urban Effects of the HRA Report, April 2021). This may reduce the overall requirement strategically but deal with potential acute development issues of development in close proximity to the SAC. Further information will be provided within the LP2 HRA.

- 6.7 LP1 Policy 83: The Epping Forest and the Epping Forest Special Area of Conservation is a protection policy which requires developments to contribute to a mitigation strategy to offset impacts of recreational pressures on the Epping Forest SAC. The policy and associated supporting text sets out the London Borough of Waltham Forest approach and specifically requires developments of 1-99 units to contribute to the SAMMs and developments of 100+ units to contribute to the provision of SAMMs and SANG, as set out in the Council's proposed SANG Strategy and associated SPD. Further details on contributions towards SANG and SAMM would be set out in the SPD, thereby ensuring an appropriate funding mechanism is in place to support this strategy.
- 6.8 This strategic solution approach is considered in the HRA at Section 5.3.1 and endorses the SPD approach to mitigation as this could provide some flexibility for potential changes to the SANGS strategy without affecting either policy or the aim of reducing recreational pressure on the SAC (HRA pp32-33). LBWF has maintained a close working relationship with other boroughs, Natural England and the Conservators of Epping Forest since 2018 and has undertaken the development of its SANGS and SAMMS mitigation strategy with their advice, involvement and oversight. Policy 83 is a substantive policy which reflects this close working.
- 6.9 In relation to the second part of the question, the SANGS strategy / mitigations SPD is intended to be responsive to potential changes to both SANGS and SAMMS in terms of both alone and in combination effects within the Epping Forest SAC recreational Zone of Influence (ZOI). The approach set out in LP1 Policy 83 through proposed modification is intended to provide flexibility as common agreement across the authorities is reached on SAMMS and as SANGS progress.

7. SANG sites Deliverability and Viability

- 7.1 SANGS sites are intended to provide an alternative to the SAC for recreation. Work to identify sites has been ongoing in order to inform the SANGS strategy and further work is being carried out on their deliverability. It is considered positive that much of the land concerned is in the ownership of the Council or of the Lea Valley Regional Park, who are an Oversight group partner with whom we are in discussion. Provision of SANGS as a means of mitigating recreational impact on the SAC is central to the delivery of the growth set out in the Local Plan and initial viability assessment indicates that the costs can be absorbed by new development over the Plan period.
- 7.2 For the mitigation proposed to be effective, we are working on a toolbox approach with the close guidance of Natural England in producing a strategic SANGS solution. As an urban borough, we are constrained in our ability to provide SANGS at the standard of 8ha per 1000 people and are compiling a list of sites which we are assessing for their suitability, availability and deliverability for the purpose of providing a network of spaces suitable for directing recreational activity away from the Epping Forest SAC. The SANGS assembled in this way are intended to form a key part of the Mitigations SPD as the potential sites identified are not strategic SANG sites for inclusion in LP1, but potential solutions supporting policy implementation and that site-specific designations (if required) will be considered as part of LP2.
- 7.3 The Local Plan (LP1) has been subject to Whole Plan Viability testing conducted by an independent consultant.⁵ The Viability Study forms part of the Council's evidence base

⁵ BNP Paribas Real Estate Consultancy Services. London Borough of Waltham Forest Part 1 Local

and is referenced KD13.1. The Study considers the requirement for mitigation to be provided by development and a range of contributions have been tested across a wide variety of scenarios and typologies. It concludes at para 6.16 that “contributions towards infrastructure through CIL and S106, 10% wheelchair accessibility, SANGS/SAMMS contributions and carbon reduction have a modest impact on scheme viability, being typically less than the provision of 5% affordable housing in a scheme. There are instances when such policies are shown to have an impact but, the LBWF’s holistic approach to assessing schemes on a site by site basis will assist in balancing all the policy asks on developments.”

- 7.4 We are confident that mitigation will not adversely affect viability at scheme or Plan level. The SANGS strategy is focussed on activating under-used or overlooked land in the urban fabric in addition to wider and more frequently used public open spaces. For the SANGS measures to be effective they would need to be actively promoted for their benefits as an alternative to EFSAC land. This would be through a combination of signage and interpretation (promoting local heritage for example) and through locally arranged events via residents’ groups etc.
- 7.5 In addition, periodic monitoring will need to be agreed to measure their effectiveness. This would work most effectively if aligned with the Visitor Surveys intended to measure the impact of visitor pressure on the EFSAC and taken forward together with the SAMMS mitigation work undertaken by the Council and other partners in the Oversight Group.

Appendix A

Natural England's Response to the LP1 HRA Report April 2021

Date: 16 July 2021
Our ref: 356324



Customer Services
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T 0300 060 3900

London Borough of Waltham Forest
BY EMAIL ONLY

Dear Sir/Madam,

Planning Consultation: Waltham Forest LP1 HRA

Thank you for your consultation on the Waltham Forest LP1 HRA report (April 2021 version).

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

Epping Forest SAC:

Water demand and water pollution: We're satisfied that the conclusion of no adverse effects remains unchanged.

Recreational pressures: In principle we agree that there will be no adverse effect once a satisfactory SANG Strategy has been reviewed and approved. However we cannot agree this until we have seen the SANG Strategy. We await this and the Mitigating the Impact of Development on SAC SPD.

Air pollution: In principle we agree that there will be no adverse effect once a satisfactory Air Quality Mitigation Strategy has been reviewed and approved. However we cannot agree this until we have seen the Mitigation Strategy.

Urban effects: In principle we agree with the conclusions of no adverse effect - pending receipt of the SANG Strategy and Air Quality Mitigation Strategy.

Lee Valley SPA:

We're satisfied with the conclusions that the LP1 will not have adverse effect on the integrity of the site with regards to water demand and water pollution; recreational pressures; urban effects and air pollution.

A minor correction on page 29- our site visit to WF was on 21st April not 20th April.

Yours sincerely,

Milena Petrovic
Lead Adviser, Sustainable Development
Thames Solent Team, Natural England

Appendix B

Lea Bridge and Leyton SANGS Strategy

Short Term Improvements – 1-3 years						
1	Digital Wayfinding/signage to the dog play and off lead areas at LJP and wider cycle network		£20,000	£1k	£80k	£100,000
2	New path to accommodate new desire lines. This is in advance of the gas works development, b) Formalise desire lines e.g. between the play areas and KukooLaLa café.	a) Desire lines, links and need to be understood further. The new development on the Clementina Gas works will add an entrance into the park. Access and egress will need to be designed to reduce the opportunity of worn desire lines. b) increase access between play area and Café at the North east Marsh lane entrance to Leyton Jubilee Park	a) TBC b) £30k	b) £2k annual on-going repairs.	£160k	£190,000
3	Local Dog /Walking route maps showing connections to Hackney and Leyton Marshes to the west or Olympic park to the south.	Add a layer to existing digital map	£7,500			£7,500
4	Additional litter bins, and benches in LJP/ Ive Farm.	Increased footfall to nearest green spaces will require increased furniture and waste receptacles.	£5k for additional	£1k per annum for repairs/replacements.	£80k	£85,000
5	Improve the amount of information available to visitors on the cultural and natural heritage features of the Park. The park was first developed on Lammas land and was designated grazing land back in 1777.	Digital information access and new signage to provide pictorial and audio descriptions for the site. This could include augmented reality guides and interactive mapping. This would be a facility across the whole site.	£20k	£5k	£400k	£420,000

	The park has a Green flag status and has a management plan covering the history and heritage of the site in greater detail.					
6	Opportunities to improve the sense of security along the path adjacent to the Dagenham Brook from the Marsh lane car park to the Feel Good too site and to the south of the Plateau, with a focus on vegetation management.	The culverted section of Dagenham Brook is approximately 200 linear meters of tarmac path. The plateau is an elevated area on one boundary which casts shade from vegetation and height of the earth bank. The opposite bank of the brook is scrubland and the boundary to a local industrial estate. Works to increase light penetration by selective tree reduction works and new shrub and tree planting.	£20k	£10k ongoing annual maintenance	£800,000	£820,000
7	Street and open space tree planting	Increase tree canopy in the local area including LJP. Program of works in collaboration with Highways to re-forest or greenify the existing residential areas radiating from Church road.	£80k	£10k	£800,000	£880,000
8	Visitor Cycle Hub in LJP	This facility is requested in the earlier time period	70k			£70,000
Medium Term Improvements – 3-5 years						
9	Access to the plateau area of LJP is via stairs, accessible path up to this. This area is part of Jubilee wood and	The plateau is the elevated reclaimed land which is around 40% of Leyton Jubilee parks southerly end. Recent re-forestation projects have substantially increased native tree planting and creation of a wildflower area. This section of the	60k	£3k per annum	£240,000	£300,000

	<p>approximately 5 hectares of newly planted native trees. The aim of this section is to create a natural landscape focusing on increasing biodiversity and nature. Making this accessible will widen the opportunity for residents with mobility issues to access nature.</p>	<p>park is about 5m higher than the lower marsh lane section and designated for biodiversity and natural habitat. The only accessible entrance to this area is from the eastern sided around 500m from the Marsh Lane Car Park. Provision of an accessibly ramped path would provide better access for less abled visitors would improve access to nature.</p>				
10	<p>Landscape and bank profiling of Dagenham Brook at Ive farm and Marsh lane sections could be considered to increase biodiversity, habitat and access to nature Length of banks approximately 200m of concrete culvert, feasibility to explore naturalising the banks, enabling better access and improve biodiversity.</p>	<p>The path mentioned in item 6 is approximately 200m long and runs along a concrete culverted section of the Dagenham brook. A feasibility study could be considered to remove the concrete culvert and re-profile the bank to increase capacity and improve access and biodiversity. Because this section is very close to the elevated plateaux banks this may not be financially viable or possible due to the current landscape.</p>	<p>Feasibility work £25k Estimated works £100k</p>	<p>£10k a year ongoing maintenance</p>	<p>£800,000</p>	<p>£925,000</p>

11	<p>Describe location of walk first. Length of walk.</p> <p>Extend Dagenham Brook link walk along the west side of the Auckland Road allotments (when Bywaters is developed) – pedestrian and cycle only link to Ive Farm/LJP.</p>	<p>Subject to landownership issues. Might be linked to flood mitigation plans and future grant funding within Highways. EA permission required. The 350m section of Dagenham Brook runs along Orient way from the Ive farm section of LJP. The brook runs at the rear of the Oliver Road Allotments and heads north at a section of land between the Allotments and Bywater’s waste transfer site.</p> <p>Improving this section of land could have flood mitigation benefits as well as improving access to nature and improve biodiverse habitat. The section is currently a mixture of scrub and highways verge planting which currently obscures the Dagenham brook. Suitable bank profiling and planting with marginal water planting and bank planting would be scoped out with landowners and stakeholders.</p>	<p>Feasibility work £25k</p> <p>Estimated works £75k</p>	<p>£10k a year ongoing maintenance</p>	<p>£800,000</p>	<p>£900,000</p>
12	<p>Improve water and general environmental quality of the Dagenham Brook through production of a more detailed improvement plan.</p>	<p>Might be linked to flood mitigation plans and future grant funding within Highways. Planting of marginal plants and banks could help improve water quality and filter water runoff from Orient Way section of Dagenham brook</p>	<p>£60k</p>	<p>£5k on-going maintenance</p>	<p>£400,000</p>	<p>£460,000</p>

Longer Term Improvements – 5-10 years						
13	Upgrading of the Marsh Land Playground. The current playground is divided into two sections, one is natural play (landscaped and using natural materials). The second section is traditional play, with purpose built play equipment and facilities.	The playground near the entrance to LJP is at the Church road /Marsh lane entrance. The play facilities currently are highly used, however pressure on the facilities at the site will require further investment with more children and families using the space. There are three schools within 300m from the playground and park facilities which increases the impact of play provision within the park.	£300k	£5k on-going maintenance	£400,000	£700,000
14	Secondary Playground at Ive Farm. Playground to be more natural in look and feel. A playground aimed at younger families to provide facilities nearer the new housing developments.	The current play facilities in Leyton Jubilee Park are in the North west side of the park Church road/Marsh Lane entrance. Increased footfall and access to the park from the eastern housing developments would benefit from an additional playground in the Ive farm area to increase provision of play and reduce travel across the park. The playground would be a traditional playground focused on younger children 7 and below with some features for older peer groups like climbing boulders or zip wires strategically placed in the open space in the eastern side of Ive farm section.	£80k	£5k on-going maintenance	£400,000	£480,000
15	Describe location of bridge and what we would	Add cycle channel to bridge	15k			£15,000

	do to improve accessibility. Opportunities to improve access to Hackney Marshes and the wider Lea Valley Regional Park including options to improve accessibility of the existing Hackney Marsh bridge over the railway					
16	Increased maintenance specification to landscape and turf sections of park due to increased footfall	The current grounds maintenance specification for Leyton Jubilee Park is approximately 75K per annum including static staff. Increased footfall and visits will require a higher level of specification to mitigate against increased usage, this will also impact on the staff based onsite and additional resource would be required to absorb higher levels of workload.	£50k set up costs and improvement program	£30k ongoing annual cost based on increased staffing and grounds maintenance specification.	£2,400,000	£2,450,000
17	Future extension of the Dagenham Brook northwards, up to Low Hall Woods	TBC	TBC	TBC		
	Total		£1,042,500			£8,802,500

- The Leyton and Lea Bridge SANGS area measures 20.46ha comprises Leyton Jubilee Park, Ive Farm and the area around the Dagenham Brook which runs alongside allotments to the top of the Bywaters waste management site.
- The draft Local Plan Site allocations identified 16,729 new dwellings to be delivered within a 4km radius.

- This would equate to a tariff of £526 per new dwelling.
- This SANGS strategy is to be reviewed after 2 years to evaluating measure which have been secured implemented/no longer applicable or relevant.
- A Brook Walk with lots of biodiversity enhancements from Osier Way up to Low Hall Woods would be good aspiration.

The Leyton and Lea Bridge SANGS area.

