

**London Borough of Waltham Forest**  
**Local Plan Part 1 with Post Hearing Main Modifications**  
**Habitats Regulations Assessment Addendum**

**July 2023**

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## 1. Introduction

- 1.1. This report is an Addendum to the Habitats Regulations Assessment (HRA) of the Waltham Forest Local Plan (LP1) issued April 2021 (LPE23)<sup>1</sup>, and updated during the Local Plan examination (LPE37)<sup>2</sup>.
- 1.2. As such, it does not recap the methodology of the HRA or the results of either the likely significant effects test or appropriate assessment, including the 'in combination' assessment. Instead, it focuses specifically on whether the updated main modifications will change the conclusion of the existing HRA.

## 2. HRA work carried out previously

- 2.1. The draft LP1 was consulted on between July and September 2019 as a part of the Regulation 18 Preferred Options consultation. Screening of LP1 in August 2019 identified a number of LSEs which required further investigation in HRA Task 2 i.e. Appropriate Assessment (AA). No LSE was identified on the Wormley-Hoddesdon Park Woods SAC.
- 2.2. Appropriate Assessment (AA) of the Regulation 18 Draft LP1 was undertaken at the beginning of 2020 and reported to Natural England in a draft HRA Report (April 2020).
- 2.3. The AA considered the following potential effects:
  - Recreational pressure;
  - Water pollution;
  - Water demand
  - Air pollution; and
  - Urbanisation.
- 2.4. LP1 was then amended and subjected to Regulation 19 Proposed Submission consultation between 26 October 2020 to 14 December 2020. The HRA Report was updated to reflect the updated screening and changes to policies since the Regulation 18 Draft LP1 was screened and assessed. An updated HRA Report accompanied the Regulation 19 Proposed Submission
- 2.5. Between January and April 2021, modifications were made to LP1 in response to consultation comments received on the Proposed Submission version and in response to the HRA Report mitigation recommendations. Modifications were screened and no new LSEs identified.

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<sup>1</sup> LPE23 - Habitats Regulations Assessment (HRA), available at: [https://www.walthamforest.gov.uk/sites/default/files/2022-03/C0093\\_ClearLead\\_WFLPpart%201\\_HRARReport\\_7.pdf](https://www.walthamforest.gov.uk/sites/default/files/2022-03/C0093_ClearLead_WFLPpart%201_HRARReport_7.pdf)

<sup>2</sup> LPE37 - Habitats Regulations Assessment (HRA) Update, available at: [https://www.walthamforest.gov.uk/sites/default/files/2022-10/LPE37.1\\_Habitats%20Regulations%20Assessment%20%28HRA%29%20Report.pdf](https://www.walthamforest.gov.uk/sites/default/files/2022-10/LPE37.1_Habitats%20Regulations%20Assessment%20%28HRA%29%20Report.pdf)

- 2.6. LP1 was submitted to the Secretary of State for Examination in Public in April 2021. In March 2022 Examination hearings took place. Modifications put forward during and after the Examination hearings have been screened and no new LSEs were identified. Modifications have included the deletion of a policy relating to downsizing of housing and a policy on designing safer places which is considered to duplicate another policy. Wording changes have been made to other policies and the Tall and Taller Buildings policy has been split into two. These updates were considered within the HRA Report of 13 October 2022 (LPE37).
- 2.7. LPE37 incorporated new information which has been made available through work undertaken by and on behalf of LB Waltham Forest in support of the HRA. The work includes a road traffic trip generation and distribution exercise which supports the consideration of potential effects on air quality from traffic resulting from the LP1. This study was undertaken by WSP consultants (September 2022). Secondly, LBWF has undertaken further work to develop proposals for the delivery of Suitable Alternative Natural Greenspace (SANG) in consultation with natural England and City of London.
- 2.8. The updated HRA (LPE37) concluded that with the mitigation in place within LP1, it will be possible to conclude that LP1 will not result in adverse effects on the integrity of Epping Forest SAC in relation to recreational pressures, air quality and urban effects when the Plan is assessed on its own or in combination with growth in neighbouring areas. The AA is able to conclude that the Waltham Forest LP1 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.

### **3. Review of Main Modifications**

- 3.1. The LP1 policies which were screened in and for which LSEs were identified are presented in Table 4.1 of LPE37.
- 3.2. The modifications to these policies which could potentially lead to LSEs have been considered in terms of the changes to these policies since they were assessed in LPE37. This is presented in Appendix 1.

### **4. Findings**

- 4.1. Modifications proposed further to the Examination hearings and assessed in LPE37 have been screened and no new LSEs were identified.
- 4.2. The modifications either have no implications for the HRA conclusions at Submission draft stage, as modified by subsequent HRA addendum reports, or they serve to strengthen mitigation of potential effects on European sites.
- 4.3. The HRA conclusion is therefore unchanged. The Waltham Forest LP1 will not result in adverse effects on the integrity of Epping Forest SAC or the Lee Valley SPA and Ramsar in relation to recreational pressures and urban effects when the Plan is assessed on its own or in combination with growth in neighbouring areas

## Appendix 1 – Assessment of changes to proposed modifications since LPE37 on European sites

Submission Local Plan Policies (Modifications) as of 01/04/21	Reason	Changes since proposed modifications screened in LPE37	Potential effects on European sites:		
			Epping Forest SAC	Lee Valley SPA and the Lee Valley Ramsar site	Wormley- Hoddesdon Park Woods SAC
<b>Policy 2: Scale of Growth</b>	LSE	No change	recreation, water pollution, air quality, urbanisation and spread of invasive species/diseases	recreation, air quality, water pollution, water demand, urbanisation and invasive species	None
<b>Policy 3: Infrastructure for Growth</b>	LSE	Clarifies implementation - no significant change	Recreation, urbanisation and spread of invasive species/diseases	None	None
<b>Policy 8: Character-Led Intensification</b>	LSE	Clarifies implementation - no significant change	recreation, air quality, urbanisation, invasive species, disease	Water pollution, recreation, urbanisation, invasive species and water resources	None
<b>Policy 9: South Waltham Forest</b>	LSE	Updated policy reflects the updated minimum housing contribution for the South Waltham Forest Area. Additional criteria at M and N referencing improvements to the visitor, sporting and wider cultural offer of the Lee Valley Regional Park, and protection of SSSI and Natura 2000 sites.	recreation, air quality, urbanisation, invasive species, disease	recreation, water resources, urbanisation including invasive species	None

Submission Local Plan Policies (Modifications) as of 01/04/21	Reason	Changes since proposed modifications screened in LPE37	Potential effects on European sites:		
			Epping Forest SAC	Lee Valley SPA and the Lee Valley Ramsar site	Wormley- Hoddesdon Park Woods SAC
<b>Policy 10: Central Waltham Forest</b>	LSE	Updated policy reflects the updated minimum housing contribution for the Central Waltham Forest Area. Additional criteria at N referencing protection of SSSI and Natura 2000 sites.	recreation, air quality, urbanisation, invasive species, disease	recreation, urbanisation, invasive species and water resources	None
<b>Policy 11: North Waltham Forest</b>	LSE	Updated policy reflects the updated minimum housing contribution for the North Waltham Forest Area. Updated criterion at N referencing protection of SSSI and Natura 2000 sites.	recreation, air quality, urbanisation, invasive species, disease	Water pollution, recreation, urbanisation, invasive species and water resources	None
<b>Policy 12: Increasing Housing Supply</b>	LSE	The policy modifications alter the phasing of the plans housing requirement – adjusting for evidence of delivery, but still delivering a minimum of 27,000 new homes.	recreation, air quality, urbanisation, invasive species, disease	Water pollution, recreation, urbanisation, invasive species and water resources	None
<b>Policy 17: Redevelopment and intensification of existing housing and housing estates</b>	LSE	No change	recreation, air quality, urbanisation, invasive species, disease	Water pollution, recreation, urbanisation, invasive species and water resources	None
<b>Policy 19: Small Sites</b>	LSE	Clarifies implementation - no significant change	recreation, air quality,	recreation, urbanisation,	None

Submission Local Plan Policies (Modifications) as of 01/04/21	Reason	Changes since proposed modifications screened in LPE37	Potential effects on European sites:		
			Epping Forest SAC	Lee Valley SPA and the Lee Valley Ramsar site	Wormley- Hoddesdon Park Woods SAC
			urbanisation, invasive species, disease	invasive species and water resources	
<b>Policy 23: Gypsies and Travellers</b>	LSE	The policy is proposed to be modified to introduce criteria for the consideration of planning applications involving new sites or significant alterations to existing sites. No significant change	recreation, air quality	recreation	None
<b>Policy 25: Supporting and boosting economic growth and local jobs creation</b>	LSE	The modifications to the plan ensure that the borough's SIL capacity is protected and introduce minor wording changes.	air quality	None	None
<b>Policy 26: Safeguarding and Managing Strategic Industrial Locations (SIL)</b>	LSE	The proposed modifications ensure conformity with the London Plan with regards to the uses which are considered to be acceptable for SIL. No significant change	air quality	None	None
<b>Policy 27: Safeguarding and Managing Local Significant</b>	LSE	The proposed modifications ensure conformity with the London Plan with regards to the uses which are considered to be acceptable for LSIS, and encourage landowners to work with neighbouring landowners to bring forward sites in a way that maximises site potential. No significant change	air quality	None	None

Submission Local Plan Policies (Modifications) as of 01/04/21	Reason	Changes since proposed modifications screened in LPE37	Potential effects on European sites:		
			Epping Forest SAC	Lee Valley SPA and the Lee Valley Ramsar site	Wormley- Hoddesdon Park Woods SAC
<b>Industrial Sites (LSIS)</b>					
<b>Policy 28: Safeguarding and Managing Borough Employment Areas</b>	LSE	The proposed modifications ensure conformity with the London Plan with regards to the uses which are considered to be acceptable for BEA, and encourage landowners to work with neighbouring landowners to bring forward sites in a way that maximises site potential. No significant change	air quality	None	None
<b>Policy 29: Approach to Non-Designated Employment Land</b>	LSE	Subsequent edits have been made to clarify the implementation of the policy and to also ensure consistency with London Plan Policy E2. No significant change.	air quality	None	None
<b>Policy 30: Industrial Masterplan Approach</b>	LSE	The modifications to the Industrial Masterplan Approach policy reflect changes agreed with the GLA to ensure conformity with the London Plan. A definition of industrial capacity is provided to ensure that there is a consistent basis for appraising intensification. No significant change.	air quality	None	None
<b>Policy 32: Workspaces</b>	LSE	No change	air quality	None	None
<b>Policy 38: Blackhorse Lane Creative Enterprise Zone</b>	LSE	Minor wording change – additional requirement application level HRA. Slight improvement.	air quality	None	None



Submission Local Plan Policies (Modifications) as of 01/04/21	Reason	Changes since proposed modifications screened in LPE37	Potential effects on European sites:		
			Epping Forest SAC	Lee Valley SPA and the Lee Valley Ramsar site	Wormley- Hoddesdon Park Woods SAC
<b>Policy 57 Tall Buildings</b>	LSE	The policy has been modified to clarify the limited circumstances in which a tall building may be supported on a site outside of those sites identified on Figure XX.	None	urban effects from tall buildings	None
<b>Policy XX - Building Heights</b>	LSE	The addition of a specific building heights policy sets out the response to surrounding character and indicative range of typical building shoulder heights. Previously considered as part of Policy 57.	None	urban effects from tall buildings	None
<b>Policy 63 Active Travel</b>	LSE	Minor change to update reference to 15-minute neighbourhood and ensure that any improvements to access routes and/or green corridors would not result in adverse effects on the integrity of the Epping Forest Special Area of Conservation (SAC) and the Lee Valley Regional Park Special Protection Area (SPA).	Recreation	Recreation	None
<b>Policy 64 Public Transport</b>	LSE	Minor wording change - no significant change	Air quality	None	None
<b>Policy 79: Green Infrastructure and the Natural Environment</b>	LSE	Modification proposed to broaden the hierarchy to include other critical designations to include LGS, SINC and statutory SPA, SAC, and to ensure consistency with the London Plan 2021.	Recreation	Recreation	None
<b>Policy 84: The Lee Valley Regional Park</b>	LSE	Minor wording change - no significant change	None	Recreation	None
<b>Policy 86: Food Growing and Allotments</b>	LSE	Minor wording change - no significant change	Spread of invasive species and diseases	Spread of invasive species	None