



Habitats Regulation Assessment and Strategic Environmental Assessment Screening Determination

HIGHAMS PARK NEIGHBOURHOOD PLAN 2018

Highams Park Planning Group

Habitats Regulation Assessment and Strategic Environmental Assessment Screening Determination

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1 Introduction

This report sets out draft Screening Determinations for the Highams Park Neighbourhood Plan (hitherto referred to as the 'Highams Park Plan') for Habitats Regulation Assessment (HRA) and Strategic Environmental Assessment (SEA). It has been prepared on behalf of the Highams Park Planning Group by CAG Consultants and ClearLead Consulting.

ClearLead Consulting are also undertaking the HRA of the emerging Waltham Forest Local Plan on behalf of the London Borough of Waltham Forest (LBWF) Council. Information gathered for the ongoing emerging Local Plan HRA has been referred to within the HRA screening determination section of this report.

The purpose of the Screening Determinations is to:

- Assess if the Neighbourhood Plan will require a Strategic Environmental Assessment (SEA); and
- Assess if the Neighbourhood Plan will require Appropriate Assessment under the HRA Regulations.

This report has been produced to enable consultation with the relevant consultation bodies. Once the consultation responses have been received, the Highams Park Plan will then be updated with any recommendations outlined within Sections 3 and 4 of this report, and in response to consultation comments, as appropriate.

Section 2 below gives information on the Neighbourhood Plan. Section 3 contains the HRA screening findings, and Section 4 contains the SEA screening findings.

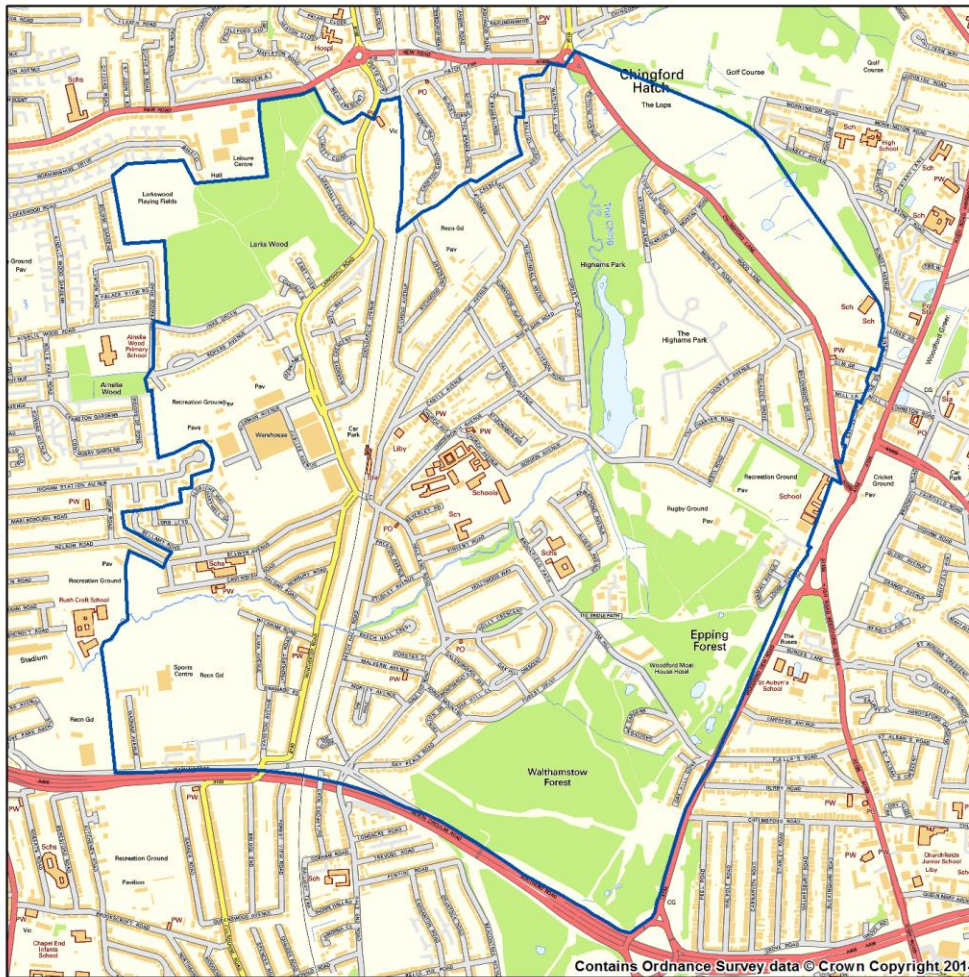
2 Highams Park Neighbourhood Plan

Highams Park is a clearly defined community and geographical area which is widely acknowledged by both local residents and the Council as 'Highams Park'. It includes component parts of the Epping Forest Special Area of Conservation (SAC) European site, which also form a Site of Metropolitan Importance to Nature Conservation (Epping Forest North) and a Site of Grade 1 Borough Importance to Nature Conservation (Lark Wood). It also contains the Woodford Green Conservation Area.

The Highams Park Plan area is defined by natural boundaries: forest (Epping Forest – including part of Woodford Golf Course and Larks Wood), sports fields and the North Circular Road. The Area within the boundary encompasses a number of overlapping local areas that are known as Highams Park (principally the area in closest proximity to the railway station), Hale End, and those parts of Woodford that fall within Waltham Forest, such as Oak Hill, the Highams Estate and Mallinson Park and part of Chingford Hatch area to the north. The Highams Park Plan area covers 383 hectares and had a population of 17,628 at the 2011 Census.

The Highams Park Plan has been produced by the Qualifying Body, Highams Park Planning Group (HPPG), and will apply to the period 2018 to 2033. The Highams Park Plan area was designated in July 2014 and is shown in the map overleaf.

Figure 1: The Highams Park Plan Area



The Highams Park Plan's overarching Vision is:

- *“The Highams Park Area will continue to be an area of beautiful, well maintained green spaces, characterful, high quality homes and a thriving commercial centre with a vibrant community at its heart”*

In order to achieve this Vision the Plan's aims are:

- *“To manage change for the benefit of existing and incoming residents so as to create a clean and safe environment that is well maintained and managed. A place that people of all ages and from all walks of life can be proud of and will want to work together to protect.*

- *To preserve and enhance facilities which encourage community cohesion.*
- *To enhance and protect the character, appearance and vitality of Highams Park as a place for business, shopping, leisure and culture.*
- *To enhance and protect the built environment and greenspaces throughout Highams Park whilst promoting environmentally sensitive change to improve residents' and visitors' enjoyment of our Area."*

The Highams Park Plan does not include proposals for housing or other development. Its overall approach is to ensure that any development enhances and protects the character of the Neighbourhood and the local environment. The Highams Park Plan notes that:

- *"Given its proximity to London, the Highams Park Area has been gradually developed over the past 140 years and there is no available greenspace for development. In the WFCs 21 Highams Park¹ is designated as part of the Chingford core area and, as such, is designated as a predominantly suburban area that contains large pockets of forest and green belt land. In view of the foregoing and the desire of local residents to maintain the character and "greenness" of the Area, this Plan requires that development be through redevelopment of sites that have already been developed"*

It identifies 11 such sites and includes guiding principles² for developing these sites, including the protection of local character, the Conservation Area and views from the SAC. However, it emphasises that:

- *"For the avoidance of doubt inclusion of sites in Table 1³ below does not mean that they are going to be developed or that we are recommending these sites for development. The purpose of this list is to acknowledge that there is a possibility that these sites could be developed by the existing (or future) owners at some point and to set parameters to ensure that any development that takes place is the most beneficial for the Area and in accordance with the expectations of local residents."*

¹ Existing Local Plan (Core Strategy) Policy

² Within Policy PSD1

³ Included within Policy PSD1

3 Habitats Regulation Assessment

Legal Requirements

Directive 92/43/EEC on the conservation of natural habitats and wild flora and fauna, commonly known as the 'Habitats Directive,' provides for the protection of habitats and species of European Community importance. Article 2 of the Directive requires the maintenance (or restoration), at favourable conservation status, of habitats and species of European Community interest. This is partly implemented through a network of protected areas referred to as 'Natura 2000 sites' (N2K), or 'European sites', consisting of:

- Special Areas of Conservation (SACs) - designated under the Habitats Directive; and
- Special Protection Areas (SPAs) - designated under the Wild Birds Directive.

'Ramsar sites', designated under the Ramsar Convention 1971, are treated by UK Government policy as if they were European sites in terms of the protection and management afforded to them. They should be included in assessment, where relevant.

Article 6(3) of the Habitats Directive requires that: *"Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives."*

This requirement is implemented in domestic English law through The Conservation of Habitats and Species Regulations 2010, with Regulation 102 setting out the obligations of the Directive's Article 6 placed upon local plan-making authorities:

"102 (1) Where a land use plan –

(a) is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination) with other plans or projects), and

(b) is not directly connected with or necessary to the management of the site, the plan-making authority must, before the plan is given effect, make an appropriate assessment of the implications for the site in view of that site's conservation objectives.

(4) In the light of the conclusions of the assessment, and subject to regulation 103 (considerations of imperative reasons of overriding public interest), the plan-making authority... must give effect to the land use plan only after having ascertained that it will not adversely affect the integrity of the European site or the offshore European marine site (as the case may be)."

Undertaking of these particular requirements is often termed a 'Habitat Regulations Assessment'(HRA).

Approach to the HRA

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.

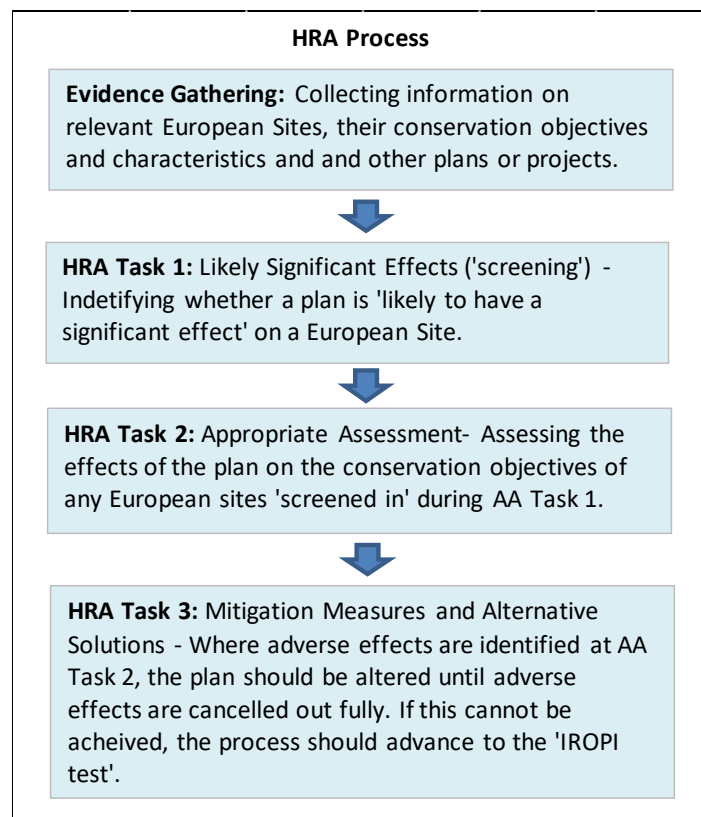
The HRA process requires close working with Natural England in order to obtain the necessary information, agree the process, outcomes and mitigation proposals, and to meet the requirements of the Habitats Regulations. The most effective way to achieve these collective aims is to agree the approach with Natural England and to undertake the HRA in an iterative manner, informing the development of the Local Plan at each of the key stages.

The following guidance has been referred to in undertaking the HRA of the Highams Park Plan:

- 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.

Figure 2 sets out the overall HRA process in accordance with Communities and Local Government draft guidance. Current best practice demonstrates that a blurring of the tasks in an iterative manner is the most effective method of assessing a plan as it develops.

Figure 2 The HRA process



If Likely Significant Effects (LSEs) on European sites are identified in screening, it is necessary to put in place measures to avoid adverse effects. Further investigation may be necessary in order to understand how a plan might affect the integrity of European sites (i.e. AA) and to develop effective avoidance/mitigation measures which give confidence to the Competent Authority (the Councils) and Natural England, that the plan can be adopted without resulting in adverse effects on European sites. The last stage in the HRA process (the IROPI test) is, as yet, largely untested at the strategic plan level and is likely to be an expensive process with no guarantee of success. It should be possible to avoid reaching this stage through the application of effective avoidance and mitigation measures.

HRA Methodology

Evidence Gathering

The first task in undertaking HRA is to confirm the European designated sites to be considered and to collate information about those sites. Current guidance⁴ suggests that the following European sites be included in the scope of assessment:

- All sites within the Highams Park Plan area boundary; and
- Other sites shown to be linked to development within the Highams Park Plan boundary through a known 'pathway' (discussed below).

Pathways are routes by which a change in activity within the Highams Park Plan can lead to an effect upon a European site.

It has been agreed through written correspondence⁵ with Natural England that the following European sites will be considered in the HRA of the LBWF Local Plan:

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

These sites are shown on Figure in Annex 1. Component sites of Epping Forest SAC lie within the Highams Park Plan area. The nearest site of Lee Valley SPA and the Lee Valley Ramsar site is 2.6 km to the west of the Highams Park Plan area. Wormley-Hoddesdonpark Woods SAC is located approximately 14 km to the north west of the Highams Park Plan area

As the LBWF Adopted Core Strategy notes, all 224,300 residents (as of 2009) within the LBWF are currently living within 1.2km of either Epping Forest or the Lee (or Lea) Valley Regional Park (within which the components of the Lee Valley SPA and Ramsar sites are geographically contained). Outside the Borough lies Wormley-Hoddesdonpark Woods SAC.

This site was considered in the HRA of the LBWF Adopted Core Strategy primarily because it lies within the distance over which visitors from Waltham Forest are likely to make recreational day visits (based on the latest results of the England Day Visits Survey).

⁴ Scottish Natural Heritage (January 2015) Habitats Regulations Appraisal of Plans Guidance for Plan-Making Bodies in Scotland Version 3.0 – in the absence of a similar Government publication for HRA of plans in England, this guidance document provides useful and relevant guidance.

⁵ Email received from Natural England representative dated 15th August 2017

There are no other European sites within 20km of the boundary of the London Borough of Waltham Forest and it is considered that there are no other European sites with which a pathway exists with development in the Borough... In accordance with the precautionary approach, and in the interests of consistency, it is considered appropriate to consider the same European sites in the HRA screening of the Highams Park Plan as are currently being considered in the HRA of the emerging Waltham Forest Local Plan. It is not considered likely that the Highams Park Plan would have any other potential impact pathways in addition to those of the Local Plan.

Annex 2 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.

Screening

The Highams Park Plan has been screened for LSEs using three screening tables (one for each European site considered) set out in Annex 3. Each screening table considers each of the key factors affecting the European sites' integrity in turn and records whether the Highams Park Plan (version dated February 2018) as a whole could affect those factors. Justifications are given for the conclusions made in the screening tables (see Annex 3).

In combination effects have been considered with regards to the extant Waltham Forest Local Plan - the Council's Development Framework and its Core Strategy (WFCS), as adopted in 2012. In its Local Plan, the LBWF Council identifies three core areas in the LBWF, being: "Leyton & Leytonstone", "Walthamstow" and "Chingford". Highams Park is situated in the core area designated as Chingford. The Council does not have a separate Area Action Plan or guidance relating specifically to the Highams Park area. There are no specific plans for significant development and population increase in the Chingford or Highams Park Area in the WFCS. However, the Highams Park Plan states that *"given current population pressures in London and the south-east it seems inevitable that the overall population of the [Highams Park] Area will continue to rise in the coming years and decades. This growth in the [Highams Park] Area's population will place additional pressure on services, resources and infrastructure"*.

The consideration of in combination effects has also included the community projects and aspirations listed in Highams Park Plan Section 6 (Delivery Plan) and developments which may come forward on the sites listed in Highams Park Plan Policy PSD2: Guidance for Specific Development Sites.

Screening Findings

The Highams Park Plan is not in itself likely to result in an increased population within the Highams Park Plan area but instead contains policies which plan for and manage the effects of an increasing population which is anticipated through reference to 2011 census data.

The Highams Park Plan does not allocate any sites for development but does contain policies to control the appearance and potential impacts of development. Policy SUS2 Protecting and Improving Biodiversity and Nature Conservation: includes the following requirements:

- “iii. Identify wildlife habitats within and in areas immediately adjacent to the development site and where practical, provide green landscaping as a continuation with these areas, linking as green corridors across the site and taking account of the type of habitat best suited for such a continuation.*
- iv. Avoid a design that will have a detrimental effect on wildlife habitats by robust assessment of local biodiversity, pollution and other significant environmental factors.*
- vi. Include bird and bat boxes, green roofs, green walls and other green infrastructure such as active green spaces and/or pocket parks in the development design.*
- viii. Make suitable provision for ongoing maintenance of all landscaping on the development site, including replacement of any plants or trees that fail to thrive.”*

These requirements will help to avoid potential adverse effects on Epping Forest SAC as a result of development.

The HRA screening exercise detailed in Annex 3 has not identified any LSEs or uncertainty resulting from the Highams Park Plan. No potential in combination effects have been identified in relation to the extant Waltham Forest Local Plan (the Development Framework and its WFCS, 2012), the development of potential sites listed in Highams Park Plan ‘Policy PSD2: Guidance for Specific Development Sites’, nor the community projects and aspirations listed in Section 6 (Delivery Plan) of the Highams Park Plan. Highams Park Plan ‘Policy SUS2 Protecting and Improving Biodiversity and Nature Conservation’ provides mitigation for potential adverse effects on the Epping Forest SAC component sites within the Highams Park Plan area, through requiring developments to *“Identify wildlife habitats within and in areas immediately adjacent to the development site” and “Avoid a design that will have a detrimental effect on wildlife habitats by robust assessment of local biodiversity, pollution and other significant environmental factors.”*

The HRA of the Waltham Forest Local Plan is ongoing and will address any strategic issues resulting from population growth and development within the Highams Park area resulting from the policies within Local Plan.

It is therefore concluded that the Highams Park Plan on its own, and in combination with other projects and plans, will not result in adverse effects on European sites.

4 Strategic Environmental Assessment Screening

Legal context

European Union Directive 2001/42/EC requires a Strategic Environmental Assessment to be undertaken for certain types of plans or programmes that could have significant environmental effects. The Directive has been transposed into law for England and Wales in the Environmental Assessment of Plans and Programmes Regulations 2004 (the Regulations).

Under the Regulations, the responsible body is required to determine whether a plan covered by the Regulations is likely to have significant environmental effects, and therefore whether a SEA is required. This process is called screening, and is undertaken using a specified set of criteria (set out in Schedule 1 of the Regulations). The Regulations require that the results of this process are set out in an SEA Screening Determination (this document), which must be publicly available.

Before the responsible body makes a formal determination, there is a requirement to consult three statutory consultation bodies designated in the regulations (Historic England, the Environment Agency & Natural England) on whether an environmental assessment is required. This draft document has been produced to facilitate that consultation.

Neighbourhood Plans and Strategic Environmental Assessment

Planning Practice Guidance states⁶ that *“to decide whether a draft neighbourhood plan might have significant environmental effects, it must be assessed (screened) at an early stage of the plan’s preparation according to the requirements set out in regulation 9 of the Environmental Assessment of Plans and Programmes Regulations 2004”*.

The Guidance notes particular circumstances which may require a SEA⁷:

“A strategic environmental assessment may be required, for example, where:

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

⁶ Paragraph: 028 Reference ID: 11-028-20150209

⁷ Paragraph: 046 Reference ID: 11-046-20150209

The Determination has taken account of the Guidance in reaching its conclusions, and it notes that the particular circumstances described above are encompassed by the criteria outlined in Schedule 1 of the Regulations.

SEA Screening assessment

As noted above, the Regulations specify a set of criteria which must be used to assess whether any plan covered by the Regulations is likely to have a significant environmental effect and therefore require a SEA. The table below considers each of these criteria in turn.

Table 1: Assessment of likelihood of significant effects on the environment

Criteria for determining the likely significance of effects	Likely to have significant effects?	Justification for assessment
1 (a) the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources	No	The framework for development in Waltham Forest is currently set by the existing Waltham Forest Local Plan ⁸ and the NPPF. A new Local Plan is currently being developed, with consultation having been completed on a Directions of Travel document which includes strategic options. The Highams Park Plan does not include site allocations or provide for any other projects which are likely to have significant effects.
1 (b) the degree to which the plan or programme influences other plans or programmes including those in a hierarchy.	No	A Neighbourhood Plan is at the bottom of the planning hierarchy and must be in conformity with the Local Plan.
1 (c) the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development	No	The Highams Park Plan focuses on protecting the character of the neighbourhood and its environment. It is considered that the Highams Park Plan's likely impact will be to have a positive effect on the environment by providing an additional layer of protection.
1(d) environmental problems relevant to the plan	No	None have been identified
1 (e) the relevance of the plan or programme for the implementation of community legislation on the environment (e.g. plans and programmes linked to waste management or water protection)	No	The Highams Park Plan will be in conformity with the existing Local Plan Policies, the NPPF and the which have taken account of existing European and National

⁸ Waltham Forest Local Plan, Core Strategy, Adopted March 2012

		legislation for environmental protection. As noted above it is likely to have a positive effect by assisting with improving environmental protection.
2 (a) the probability, duration, frequency and reversibility of the effects	No	No significant effects have been identified
2 (b) the cumulative nature of the effects	No	No significant effects have been identified
2 (c) the trans-boundary nature of the effects	No	No significant effects have been identified
2 (d) the risks to human health or the environment (e.g. due to accidents)	No	No significant effects have been identified
2 (e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)	No	No significant effects have been identified
2 (f) the value and vulnerability of the area likely to be affected due to: (i) special natural characteristics or cultural heritage (ii) exceeded environmental quality standards (iii) intensive land-use	No	<p>The Highams Park Plan area does contain sensitive features, particularly component parts of the Epping Forest SAC but there are no proposals in the Plan which are likely to have significant environmental effects on these features. In fact, Plan policies are designed to protect these features. Character Assessments have been produced for the area and are included in the Highams Park Plan. The following specific policies protect sensitive features:</p> <ul style="list-style-type: none"> • POLICY GNE1: Designation of Local Green Space • POLICY CDP1: Safeguarding and enhancing Conservation Areas, Areas of Special Character and Listed and Locally Listed Buildings • POLICY CDP2: Character & Design • POLICY SUS2: Protecting and Improving Biodiversity and Nature Conservation • POLICY PSD1: Development & Redevelopment of Existing Sites. • POLICY PSD2: Guidance for Specific Development Sites. <p>As noted in the discussion in Section 2, the last two policies listed above do not promote</p>

		development but identify guiding principles to be applied should these brownfield sites be redeveloped.
2 (g) the effects on areas or landscapes which have a recognised national, community or international protection status	No	As noted above, the Highams Park Plan area includes component parts of the Epping Forest SAC. The HRA screening above concludes that the Highams Park Plan on its own, and in combination with other projects and plans, will not result in adverse effects on European sites.

SEA Screening determination

In summary, it is concluded that the Highams Park Plan is not likely to have significant environmental effects and therefore a SEA is not required. The principal reasons for this conclusion are:

- No sites are allocated for development in the Plan.
- The Plan focuses on protecting the character of the neighbourhood and its environment. It is considered that the Neighbourhood Plan's likely impact will be to have a positive effect on the environment by providing an additional layer of protection.
- The Highams Park Plan area does contain sensitive features, particularly component parts of the Epping Forest SAC, but there are no proposals in the Plan which are likely to have significant environmental effects on these features. In fact, Plan policies are designed to protect these features.

5 Recommendations

Recommendations from HRA screening

Although the HRA screening exercise has concluded that the Highams Park Plan will not result in adverse effects on European sites, the following recommendations are made to strengthen the plan:

- 1) Parts of the Epping Forest SAC lie within the Highams Park Plan area but the international importance of this site is not mentioned within the Plan. It is recommended that Epping Forest SAC is referred to within the main body of the Highams Park Plan (such as within Sections 4.7 and 4.8) and wording added to Highams Park Policy SUS2 stating that development shall avoid adverse effects on Epping Forest SAC by undertaking HRA screening of individual developments and, if necessary, incorporating measures into scheme designs to avoid potential adverse effects on the SAC.
- 2) It is recommended that Highams Park Plan Policy SUS2 is amended to include a requirement for developers to take steps to avoid the introduction of invasive species on development sites within the Highams Park Plan area.

Recommendations from SEA screening

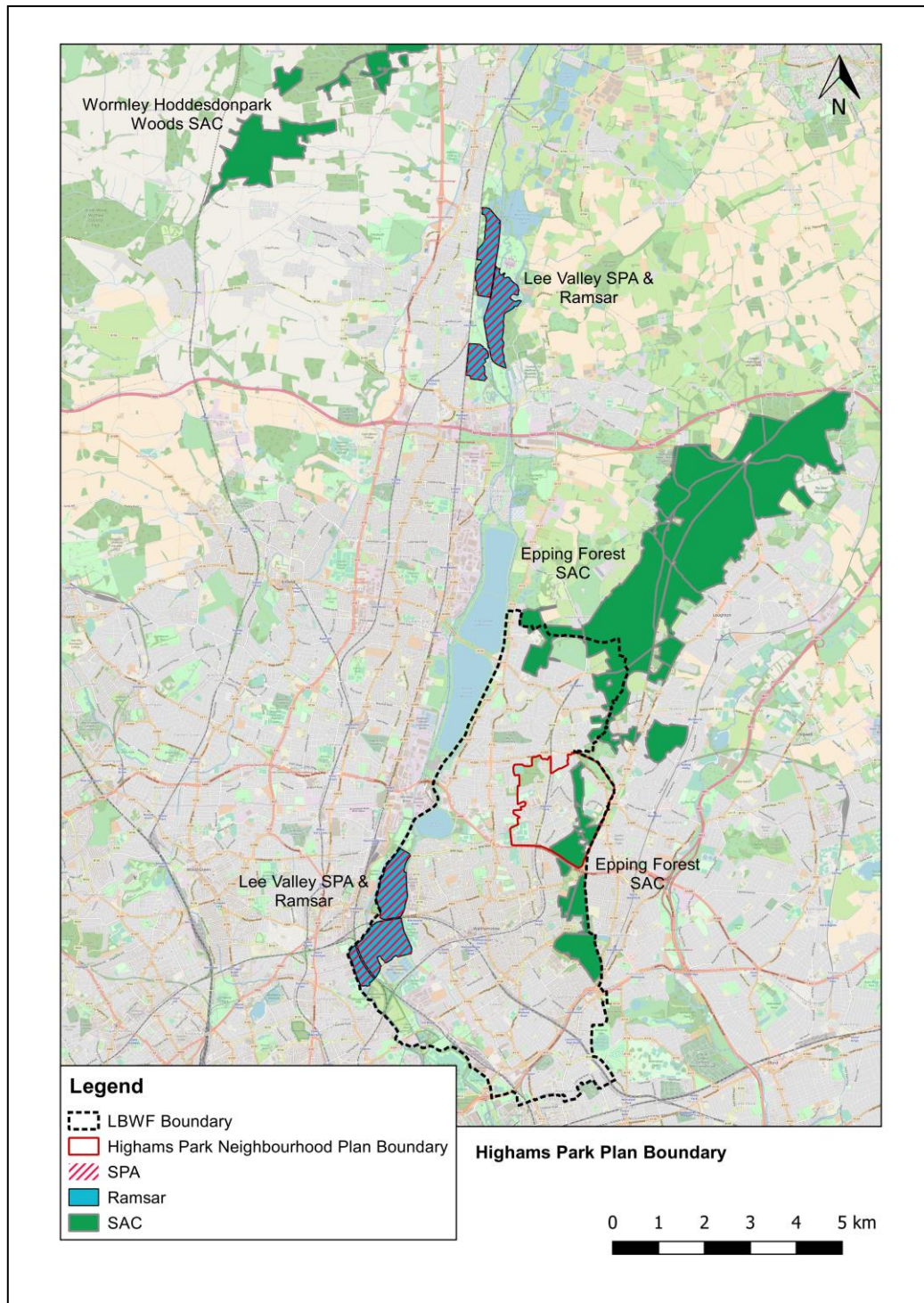
In addition to the recommendations from the HRA Screening above, the SEA screening also identified the following opportunities to strengthen the Plan by protecting key features:

- 3) Although Appendix 2 refers to designations attached to Green Spaces, biodiversity sites in addition to the SAC are not mentioned in the main body of the report. It is recommended that other key sites specifically mentioned within the Appendices are referred to in Policy SUS2.
- 4) Similarly, it is recommended that text related to Policy CDP1 specifically mentions key heritage features.

ANNEX 1

FIGURE SHOWING EUROPEAN SITES

Figure 3: European sites in and near to the London Borough of Waltham Forest and the Highams Park Plan



ANNEX 2

INFORMATION ABOUT EUROPEAN SITES

Table 2.1: 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 Waltham Forest Local Plan area with the southern part of the site extending into the north and east of the Waltham Forest Local Plan area: approximately 3.25 km ² of the site is within the Waltham Forest Local Plan area itself and 72.95 hectares lies within the Highams Park Plan area.
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 shrublayer (<i>Quercion roburi-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 SSSI units entirely or partly within the Highams Park Plan area: <ul style="list-style-type: none"> Highams Park & The Sale (133): 32.66 hectares (entirely within the Highams Park Plan area). White House Woods (203): 3.99 hectares (entirely within the Highams Park Plan area). Walthamstowe Forest (134): 36.30 hectares (within the Highams Park Plan area). Other component sites of the Epping Forest SAC lie to the north of Highams Park Plan area.
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;

Table 2.1: Epping Forest SAC	
	<ul style="list-style-type: none"> • The populations of qualifying species, and, • The distribution of qualifying species within the site.⁹
Vulnerability and current conditions	
<p>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.</p> <p>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.</p> <p>The SSSI units entirely or partly within the Highams Park Plan area are all in unfavourable condition due to air pollution:</p> <ul style="list-style-type: none"> • Highams Park & The Sale (133): 32.66 hectares. Unfavourable declining condition status due to air pollution. (https://designatedsites.naturalengland.org.uk/UnitDetail.aspx?UnitId=1030307) • White House Woods (203): 3.99 hectares. Unfavourable no change condition status due to air pollution. (https://designatedsites.naturalengland.org.uk/UnitDetail.aspx?UnitId=1030314) • Walthamstowe Forest (134): Unfavourable no change due to air pollution. (https://designatedsites.naturalengland.org.uk/UnitDetail.aspx?UnitId=1030308) 	
Key factors affecting site integrity and objectives to ensure favourable condition status of the site (relating to conservation objectives)	
<ul style="list-style-type: none"> • 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; • 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. <i>Phytophthora</i> ¹⁰ 	

⁹ Natural England 30 June 2014 – version 2. <http://publications.naturalengland.org.uk/publication/5908284745711616>

¹⁰ Adapted from Site improvement plan – Epping Forest SAC (Natural England, 2016).
<http://publications.naturalengland.org.uk/publication/6663446854631424>

Table 2.2: 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 Waltham Forest Local Plan area with the remaining parts of the SPA occurring to the north of the Waltham Forest Local Plan area along a series of wetland and reservoirs within Lee Valley. The nearest component site to the Highams Park Plan area is Walthamstowe Reservoirs, 2.6 km to the west.
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) 	
Component SSSI sites	<ul style="list-style-type: none"> • Walthamstow Reservoirs SSSI • Amwell Quarry SSSI • Rye Meads SSSI

Table 2.2: Lee Valley SPA	
	<ul style="list-style-type: none"> • 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.¹¹
<p>Vulnerability and current condition</p> <p>The Information Sheet on Ramsar Wetlands¹², 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>The Walthamstowe Reservoirs SSSI component site is the nearest part of the SPA and Ramsar site to the Highams Park Plan area. This component SSSI is in unfavourable recovering condition (surveyed in 2014) due to a trend of breeding heron numbers failing to meet the minimum thresholds. This is not thought to be due to detrimental site management and the underlying causes are being investigated.</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; • 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.¹³ 	

¹¹ <http://publications.naturalengland.org.uk/publication/5670650798669824>

¹² <http://jncc.defra.gov.uk/pdf/RIS/UK11034.pdf>

¹³ Adapted from Site Improvement Plan – Lee Valley SPA (Natural England, 2014)
<http://publications.naturalengland.org.uk/publication/5864999960444928>

Table 2.3: Wormley Hoddesdonpark Wood SAC	
Name	Wormley Hoddesdonpark Woods SAC UK0013696
Location with regards to plan area	The site occurs approximately 14 km to the north west of the Highams Park Plan area and approximately 10.6 km from the Waltham Forest Local 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.¹⁴
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). Natural England's Site Improvement Plan (SIP)¹⁵ indicates that 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 and is well-managed. Sensitive management of access points and routes by the site's main owners has been largely successful in mitigating the potential adverse effects of this high level of use. As such, general recreational pressure is not indicated in the Site Improvement Plan as a current or future obstacle to achieving or maintaining favourable conservation status and preserving the integrity of the SAC. 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>	

¹⁴ Natural England 30 June 2014 – version 2.

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

¹⁵ <http://publications.naturalengland.org.uk/file/6541134543192064> accessed on 11/04/18

Table 2.3: 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.¹⁶

¹⁶ Adapted from Site Improvement Plan – Wormsley Hoddesdonpark Wood (Natural England, 2015)
<http://publications.naturalengland.org.uk/publication/6314181103976448>

ANNEX 3

SCREENING TABLES

Table 3.1: Epping Forest SAC Screening Table		
Key factors affecting site integrity and objectives to ensure favourable condition status of the site (relating to conservation objectives)	Could the Highams Park Plan result in a Likely Significant Effect (LSE) on the European site, by affecting these factors either alone or in combination with the Waltham Forest Development Framework and Core Strategy (WFCS), as adopted in 2012 and the community projects and aspirations listed in Section 6 (Delivery Plan) of the Highams Park Plan?	
	LSE Y/N?	Justification
Air pollution - ensure no further increase in atmospheric nitrogen deposition, and measures are implemented to control, reduce and ameliorate nitrogen impacts.	N	The Highams Park Plan will not result in increased traffic or movements and aims to support and enhance the provision of sustainable modes of transport. An objective of the Highams Park Plan is that development within the Plan Area shall contribute towards enhancing the provision of sustainable modes of transport. Higham Park Plan Policies TPR2: Cycling and TPR1 Parking support facilitation of cycling within the Plan Area and the restriction of parking and encouragement of the use of electric cars.
Undergrazing - Maintain appropriate grazing levels.	N	The Highams Park Plan will not affect the grazing regime on the European site. No impact pathway.
Recreational pressure - manage recreational activity within the site.	N	The Highams Park Plan itself does not propose allocation sites for new development and as such will not in itself increase recreational pressure on the European site. The Highams Park Plan contains policies which encourage provision of localised recreational space within development schemes. Policy SUS2 requires developers to "provide green infrastructure such as active green spaces and/or pocket parks in the development design." This will help to avoid potential adverse effects on Epping Forest resulting from new residential development which comes forward within the Highams Park Plan area.
Changes in species distribution - Maintain extent and distribution of beech trees by managing beech tree health and beech sapling recruitment.	N	The Highams Park Plan will not directly or indirectly affect distribution and health of beech trees. No impact pathway.
Hydrological changes - maintain hydrological conditions within the site.	N	The Highams Park Plan itself will not result in hydrological changes to the European site, as it does not propose any development.

Table 3.1: Epping Forest SAC Screening Table

		Recommendation: It is recommended that Epping Forest SAC is referred to within the main body of the Highams Park Plan (such as within Sections 4.7 and 4.8) and developers' attention is drawn to the fact that individual developments will need to be screened for HRA and, if necessary, measures built into scheme designs to avoid potential adverse effects on the SAC, in line with Highams Park Plan Policy SUS2.
Water pollution - ensure water pollutants do not enter the site.	N	The Highams Park Plan itself will not result in water pollution which could affect the European site, as it does not propose any development. Recommendation: It is recommended that Epping Forest SAC is referred to within the main body of the Highams Park Plan (such as within Sections 4.7 and 4.8) and developers' attention is drawn to the fact that individual developments will need to be screened for HRA and, if necessary, measures built into scheme designs to avoid potential adverse effects on the SAC, in line with Highams Park Plan Policy SUS2.
Invasive species - ensure invasive species do not spread i.e. heather beetle and grey squirrel.	N	The Highams Park Plan itself will not result in the introduction of invasive species to the Highams Park Plan area or necessarily enable the spread of invasive species, as it does not propose any development. Recommendation: It is recommended that Highams Park Plan Policy SUS2 is amended to include a requirement for developers to take steps to avoid the introduction of invasive species on development sites within the Highams Park Plan area.
Disease - ensure disease does not spread within the site i.e. <i>Phytophthora</i> ¹⁷	N	The Highams Park Plan itself will not affect the spread of disease in vegetation within the Epping Forest SAC.

¹⁷ Adapted from Site improvement plan – Epping Forest SAC (Natural England, 2016).
<http://publications.naturalengland.org.uk/publication/6663446854631424>

Table B3.2: Lee Valley SPA and Ramsar Site Screening Table

Key factors affecting site integrity and objectives to ensure favourable condition status of the site (relating to conservation objectives)	Could the Highams Park Plan result in a Likely Significant Effect (LSE) on the European site, by affecting these factors either alone or in combination with the Waltham Forest Development Framework and Core Strategy (WFCS), as adopted in 2012 and the community projects and aspirations listed in Section 6 (Delivery Plan) of the Highams Park Plan?	
	LSE Y/N?	Justification
Water pollution - ensure water pollutants do not enter the site and nutrient enrichment is limited.	N	The Highams Park Plan itself will not result in water pollution which could affect the European site, as it does not propose any development. The nearest component site of the SPA and Ramsar site is 2.6 km away from the Highams Park Plan area.
Hydrological changes - maintain hydrological conditions within the site with consistent freshwater flows and volumes.	N	The Highams Park Plan itself will not result in hydrological changes to the European site, as it does not propose any development. The nearest component site of the SPA and Ramsar site is 2.6 km away from the Highams Park Plan area.
Recreational pressure - manage recreational activities in sensitive locations.	N	<p>The main species for which the SPA and Ramsar site are designated – wintering gadwall and shoveler ducks – are not highly sensitive to disturbance and are readily able to adapt (habituate) to the presence of shore-based human recreational activities without being displaced from the site (as opposed to water-based activities which are potentially highly disturbing).</p> <p>The nearest part of the Lee Valley SPA and Ramsar site to the Highams Park Plan area is the Lockwood Reservoir (2.6 km to the west) which forms part of the recently launched 'Walthamstowe Wetlands' which is a wetland nature reserve development which has opened up public access to the wetlands in a carefully managed manner. Management of the site includes no paddling, swimming diving or use of boats, no access by dogs, no feeding of wildlife or throwing stones, cycling and running only on designated paths, no barbeques or open fires, no unaccompanied children under the age of 16 and encouragement of visitors to take all litter home.</p> <p>The Highams Park Plan itself does not propose allocation sites for new development and as such will not in itself increase recreational pressure on the European site. The Highams Park Plan contains policies which encourage provision of localised recreational space within development schemes. Policy SUS2 requires developers to "provide green infrastructure such as active green spaces and/or pocket parks in the development design." This will help to avoid potential adverse effects on Epping</p>

Table B3.2: Lee Valley SPA and Ramsar Site Screening Table

		Forest resulting from new residential development which comes forward within within the Highams Park Plan area.
Inappropriate scrub control - maintain appropriate scrub management.	N	The Highams Park Plan will not affect the management of the European site. No impact pathway.
Fisheries - maintain appropriate fish species and population levels to ensure suitable food and water quality is maintained for designated features.	N	The Highams Park Plan will not affect the management of the fisheries and fish species within the European site. No impact pathway.
Invasive species - ensure invasive species do not spread, particularly <i>Azolla</i> and invasive aquatic blanket weeds.	N	The Highams Park Plan itself will not result in the introduction of invasive species to the Highams Park Plan area or necessarily enable the spread of invasive species, as it does not propose any development. The nearest component site of the SPA and Ramsar site is 2.6 km away from the Highams Park Plan area.
Inappropriate cutting/mowing - maintain appropriate cutting/mowing regime for reedbed.	N	The Highams Park Plan will not affect the management of the European site. No impact pathway.
Air pollution - ensure no further increase in atmospheric nitrogen deposition. ¹⁸	N	The Highams Park Plan will not result in increased traffic or movements and aims to support and enhance the provision of sustainable modes of transport. An objective of the Highams Park Plan is that development within the Plan Area shall contribute towards enhancing the provision of sustainable modes of transport. Higham Park Plan Policies TPR2: Cycling and TPR1 Parking support facilitation of cycling within the Plan Area and the restriction of parking and encouragement of the use of electric cars.

¹⁸ Adapted from Site Improvement Plan – Lee Valley SPA (Natural England, 2014)
<http://publications.naturalengland.org.uk/publication/5864999960444928>

Table B.3: Wormley Hoddesdonpark Wood SAC Screening Table

Key factors affecting site integrity and objectives to ensure favourable condition status of the site (relating to conservation objectives)	Could the Highams Park Plan result in a Likely Significant Effect (LSE) on the European site, by affecting these factors either alone or in combination with the Waltham Forest Development Framework and Core Strategy (WFCS), as adopted in 2012 and the community projects and aspirations listed in Section 6 (Delivery Plan) of the Highams Park Plan?	
	LSE Y/N?	Justification
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.	N	The European site is approx. 14 km from the Highams Park Plan area. The Highams Park Plan does not propose any development itself and is not likely to increase visits or activities within the Wormley-Hoddesdonpark Wood SAC which could introduce or help spread diseases within the woodland.
Invasive species - ensure invasive species do not spread. Invasive species currently within the site include sycamore, turkey oak, rhododendron and snowberry.	N	The European site is approx. 14 km from the Highams Park Plan area. The Highams Park Plan does not propose any development itself and is not likely to increase visits or activities within the Wormley-Hoddesdonpark Wood SAC which could introduce or help spread invasive species within the woodland.
Air pollution - ensure no further increase in atmospheric nitrogen deposition.	N	The Highams Park Plan will not result in increased traffic or movements because it does not allocate sites for develop and is unlikely to result in an increase in population in the Plan area. The Highams Park Plan aims to support and enhance the provision of sustainable modes of transport. An objective of the Highams Park Plan is that development within the Plan Area shall contribute towards enhancing the provision of sustainable modes of transport. Higham Park Plan Policies TPR2: Cycling and TPR1 Parking support facilitation of cycling within the Plan Area and the restriction of parking and encouragement of the use of electric cars.
Vehicles - ensure no further fly tipping occurs within the site and illegal vehicles are not used within the site.	N	The European site is approx. 14km from the Highams Park Plan area. The Highams Park Plan does not propose any development itself and is not likely to increase visits or activities within the Wormley-Hoddesdonpark Wood SAC which could increase fly tipping on the European site.
Deer - minimise deer browsing within the woodlan.	N	The Highams Park Plan will not affect deer populations in this area. No impact pathway.
Woodland management - ensure appropriate woodland management continues within the site.	N	The Highams Park Plan will not affect the woodland management of the Wormley-Hoddesdonpark Wood SAC. No impact pathway.

Table B.3: Wormley Hoddesdonpark Wood SAC Screening Table

Recreational pressures - maintain visitor management practices and review monitoring regularly and change management to adapt to changes in visitor activity. ¹⁹	N	<p>The European site is approx. 14 km from the Highams Park Plan area. The Highams Park Plan does not propose any development itself. The Highams Park Plan is not likely to introduce new residents into the Highams Park Plan area which could increase recreational pressure, such as for occasional recreation.</p> <p>The Highams Park Plan contains policies which encourage provision of localised recreational space within development schemes. Policy SUS2 requires developers to “provide green infrastructure such as active green spaces and/or pocket parks in the development design.” This will help to avoid potential adverse effects on the Wormley-Hoddesdonpark Wood SAC resulting from new residential development which comes forward within the Highams Park Plan area.</p>
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¹⁹ Adapted from Site Improvement Plan – Wormsley Hoddesdonpark Wood (Natural England, 2015)
<http://publications.naturalengland.org.uk/publication/6314181103976448>