

South Woodford Neighbourhood Plan

Joint Strategic Environmental Assessment (SEA) and
Habitats Regulations Assessment (HRA) Screening Opinion

South Woodford Neighbourhood Forum

April 2023

Quality information

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1. Purpose of this SEA Screening

- 1.1 This SEA screening opinion has been prepared by AECOM in relation to the South Woodford Neighbourhood Plan (hereafter referred to as “the SWNP”).
- 1.1 The purpose of the screening opinion is to set out an opinion in relation to whether a Strategic Environmental Assessment (SEA) process and/or an Habitats Regulations Assessment (HRA) process is required to accompany the development of the SWNP. The screening opinion has been provided to the statutory consultation bodies for SEA (Historic England, the Environment Agency, and Natural England) for their opinion.
- 1.2 SEA is a systematic process undertaken to evaluate the likely significant environmental effects of plans. The requirement for SEA in England was introduced in 2004 through the Environmental Assessment of Plans and Programmes Regulations 2004 (‘The SEA Regulations’)¹, which transposed the European SEA Directive (2001/42/EC). HRA considerations are also presented and discussed within this Screening Opinion, from **Chapter 5** onwards.
- 1.3 One of the ‘basic conditions’ that a neighbourhood plan is tested against is whether the making of the neighbourhood plan is compatible with European Union obligations, including obligations under the SEA Directive². Neighbourhood plans only require SEA where they are likely to lead to significant environmental effects. To decide whether a proposed neighbourhood plan is likely to have significant environmental effects, it should be screened against the criteria set out in Annex 2 of the SEA Directive.
- 1.4 Where it is determined that a neighbourhood plan is unlikely to have significant environmental effects (and, accordingly, does not require SEA), a statement of reasons for this determination should be prepared and published for consultation with the statutory consultation bodies (Natural England, the Environment Agency, and Historic England). Where a neighbourhood plan is likely to have a significant effect on the environment, an SEA process must be carried out.
- 1.5 This screening opinion therefore provides a view as to whether the SWNP is likely to lead to significant environment effects, and as such requires an SEA and/or an HRA process. In this context it presents the following:
- Details and context of the neighbourhood plan, including its scope and likely content, its relationship with Redbridge Borough Council’s Local Plan (“the Adopted Local Plan”), and the key environmental constraints in the vicinity of the neighbourhood area (**Chapter 2**).
 - A discussion of the potential significant environmental effects of the neighbourhood plan and their significance (**Chapter 3**).
 - A summary of the SEA screening opinion (**Chapter 4**); and

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² The UK left the EU on 31st January 2020. Under the UK-EU withdrawal agreement, a transition period ended on 31st December 2020, during which time all EU law continued to apply to the UK. During the transition period the UK needed to continue following domestic law that implements EU law, or directly applicable EU law that is given effect through the EUWA 2018. Beyond the transition period, the SEA Regulations, which previously implemented the requirements of the SEA Directive in England, will continue to apply as before unless and until new legislation is introduced.

- HRA test of likely significance (screening) for the SWNP (**Chapter 5**).

1.6 The statutory environmental bodies for SEA (and for HRA, Natural England) are subsequently invited to provide their comments.

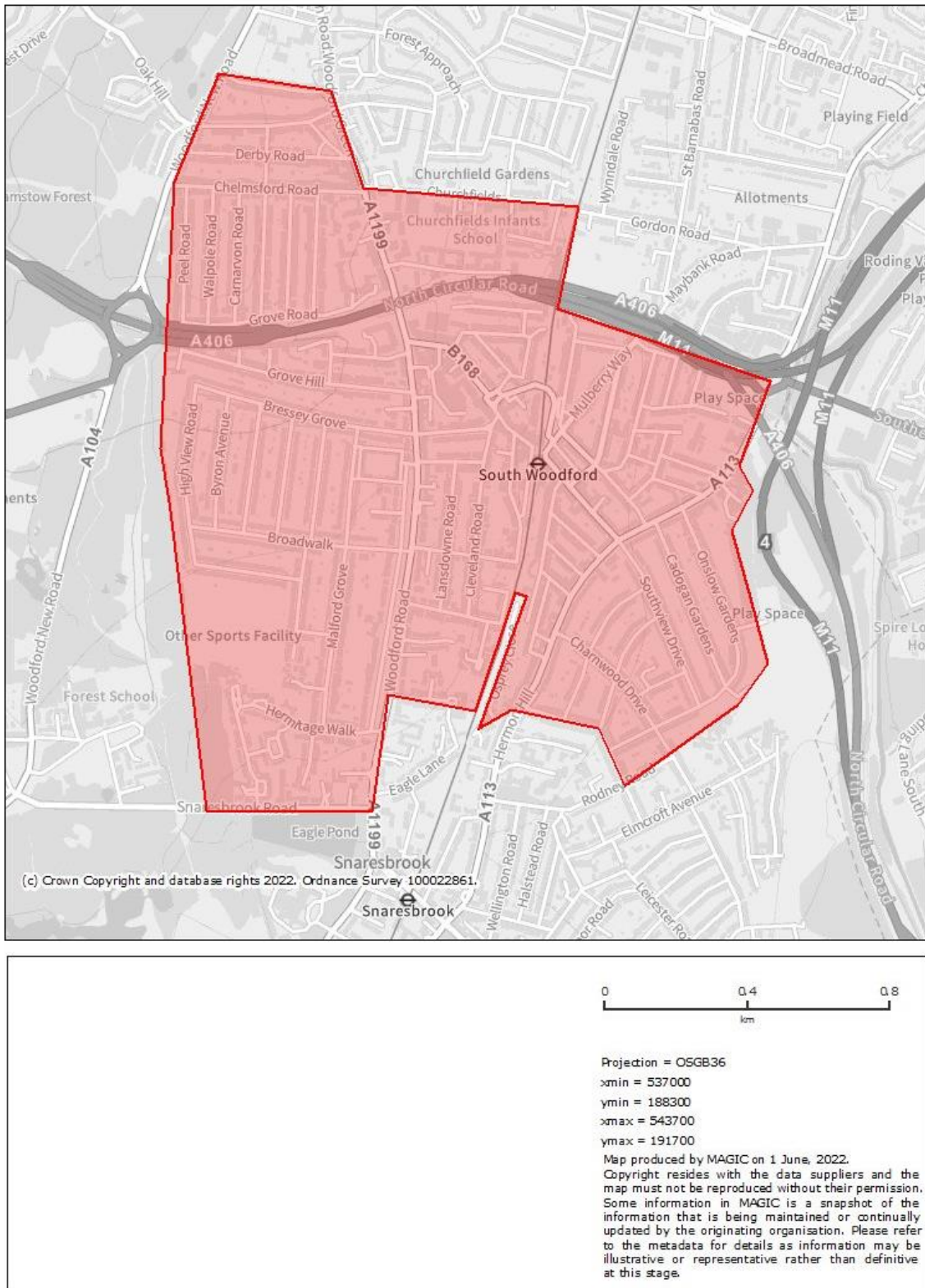


Figure 1.1: South Woodford neighbourhood area

2. Context for the Neighbourhood Plan and area

Key information relating to the Neighbourhood Plan

2.1 Key information relating to the SWNP is presented in **Table 2.1** below.

Table 2.1: Key information relating to the SWNP

Name of Qualifying Body	South Woodford Neighbourhood Forum
Title of the Plan	South Woodford Neighbourhood Plan (“SWNP”)
Area covered by the Plan	The boundary of the neighbourhood area is presented in Figure 1.1 above. South Woodford is in East London (London Borough of Redbridge), accessible via the Central Line. Neighbouring locations include Woodford (to the north), Walthamstow (to the west), and Wanstead (to the south). The neighbourhood area is bound by Epping Forest (western boundary) and Roding Valley Park (eastern boundary).
Timescale	The SWNP covers the period until 2030.
Purpose, aims and objectives	<p>The vision for the SWNP is as follows:</p> <p><i>South Woodford will be a clean, green, and safe environment that is well-managed and maintained for all those who live, work, learn and visit. It will be 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. Our town centre will be even busier and more vibrant with a great shopping experience for all. Our green spaces will be enhanced, and an environmentally sensitive culture will be fostered to protect and improve our amenities for everyone’s benefit. The creation of well-designed and well-built structures that benefit all.</i></p> <p>This vision will be achieved through the following aims:</p> <ul style="list-style-type: none"> • Building a stronger community, fostering a collaborative and inclusive approach. • Creating a clean and safe environment. • Engendering a coherent and sustainable approach to development to support Redbridge’s policy of becoming net zero by 2030. • Ensuring a holistic approach to planning and infrastructure improvements. • Improving and increasing access to green spaces within the community, encouraging residents to support biodiversity and Redbridge’s Grow Zones initiative. • Enhancing the vibrancy of the town centre with a great variety of businesses. • Supporting local businesses through the established South Woodford Business Forum; and • Preserving the heritage of South Woodford.
Neighbourhood Plan contact	Pearl Arbenser-Simmonds, Neighbourhood Forum Representative Email: arbysims@gmail.com

Further context for the Neighbourhood Plan and area, including key environmental constraints

2.2 Further context for the SWNP, including the key environmental constraints in the neighbourhood area, is presented below.

Local Plan context for the Neighbourhood Plan

2.3 The SWNP is being prepared in the context of the Redbridge Local Plan 2015-2030³ (“the Adopted Local Plan”), the key documents of which includes the overarching local plan document⁴, the Redbridge Minerals Local Plan⁵, and the Joint Waste Development Plan for the East London Waste Authority Boroughs⁶.

2.4 The vision of the Adopted Local Plan is to direct growth to the borough’s investment and growth areas, in which South Woodford is included, to deliver thriving places, energy efficient housing, a dynamic economy and community services. This is embedded in Objective 1 of the Adopted Local Plan. South Woodford has been designated as an investment and growth area to ensure the growth strategy boots local business and commercial activity as well as deliver additional housing.

2.5 In the context of the above, Policy LP1D: ‘South Woodford Investment and Growth Area’ within the Adopted Local Plan outlines the level of growth Redbridge Council will seek to deliver during the local plan period:

- 430 new homes.
- 3,500 sqm of new retail space.
- 6,100 sqm of new employment floor space.
- 600 new jobs.
- High street and public realm improvements.
- School expansions and improved health infrastructure.
- Improved cycle infrastructure; and
- The preservation and enhancement of George Lane and South Woodford conservation areas.

2.6 In September 2022, Redbridge Council approved an indicative timeframe for the review of the Adopted Local Plan and for consultation activities to begin⁷. The new Local Plan will set out a compelling vision for the physical development of the borough, promoting the delivery of new homes, jobs, and supporting community infrastructure. The Local Plan review is in its relatively early stages and is paused at present. When the Local Plan review process resumes, it is anticipated that scope and timescales will be outlined in further detail through the preparation of an updated Local Development Scheme. Further information is available on Redbridge Council’s webpages.

³ Redbridge Council (2023) ‘Local Plan Adoption’ can be accessed [here](#).

⁴ Redbridge Council (2018) ‘Redbridge Local Plan 2015-2030’ can be accessed [here](#).

⁵ Redbridge Council (2012) ‘Minerals Local Plan’ can be accessed [here](#).

⁶ East London Waste Authority Boroughs (2012) ‘Joint Waste Development Plan’ can be accessed [here](#).

⁷ Redbridge Council (2023): ‘Local Plan Review’ can be accessed [here](#)

Key components of the Neighbourhood Plan

- 2.7 The vision and aims of the SWNP are presented above in **Table 2.1**.
- 2.8 In terms of key land use policies which should be considered for their potential for significant environmental effects, the SWNP is not seeking to allocate land for housing or employment uses.
- 2.9 The SWNP instead is seeking to shape development which may come forward during the plan period by supporting development which meets a series of criteria. This is likely to include relating to housing (type, tenure, and affordability), and in terms of design (supported by design codes), town centre regeneration, public realm improvements, green infrastructure enhancements, community value, climate change mitigation and adaptation, environmental protection, and economic vitality.
- 2.10 In this respect the SWNP will be strongly design led. Policy provisions will likely focus on informing and influencing the design of new development areas which have the potential to come forward in the neighbourhood area, including any Local Plan allocations.
- 2.11 The SWNP is also unlikely to lead to any significant changes of land use in the neighbourhood area.

Environmental constraints present in the neighbourhood area

- 2.12 A key determinant of whether effects are likely to be significant is the sensitivity of the asset affected. In this context, the more environmentally sensitive a location, the more likely it is that potential environmental effects from a plan will be significant.
- 2.13 Planning Practice Guidance (PPG)⁸ provides guidance on this topic through providing a list of sites and areas which should be deemed as 'sensitive areas' for the purposes of environmental assessment⁹.
- 2.14 These comprise:
- Sites of Special Scientific Interest (SSSI).
 - Natura 2000 sites.
 - National Parks.
 - Areas of Outstanding Natural Beauty (AONBs).
 - World Heritage Sites (WHS); and
 - Scheduled Monuments.
- 2.15 In the context of the PPG, there are two sensitive areas within or adjacent to the neighbourhood area, as follows:
- Epping Forest Special Area of Conservation (SAC) comprises 1630.74 ha of land characterised by inland water bodies (standing water, running

⁸ DLUHC & MHCLG (2021) 'The National Planning Policy Framework and relevant planning practice guidance' can be accessed [here](#)

⁹ These sites and areas that should be considered 'sensitive' for the purposes of screening projects for Environmental Impact Assessment (additional information can be accessed [here](#))

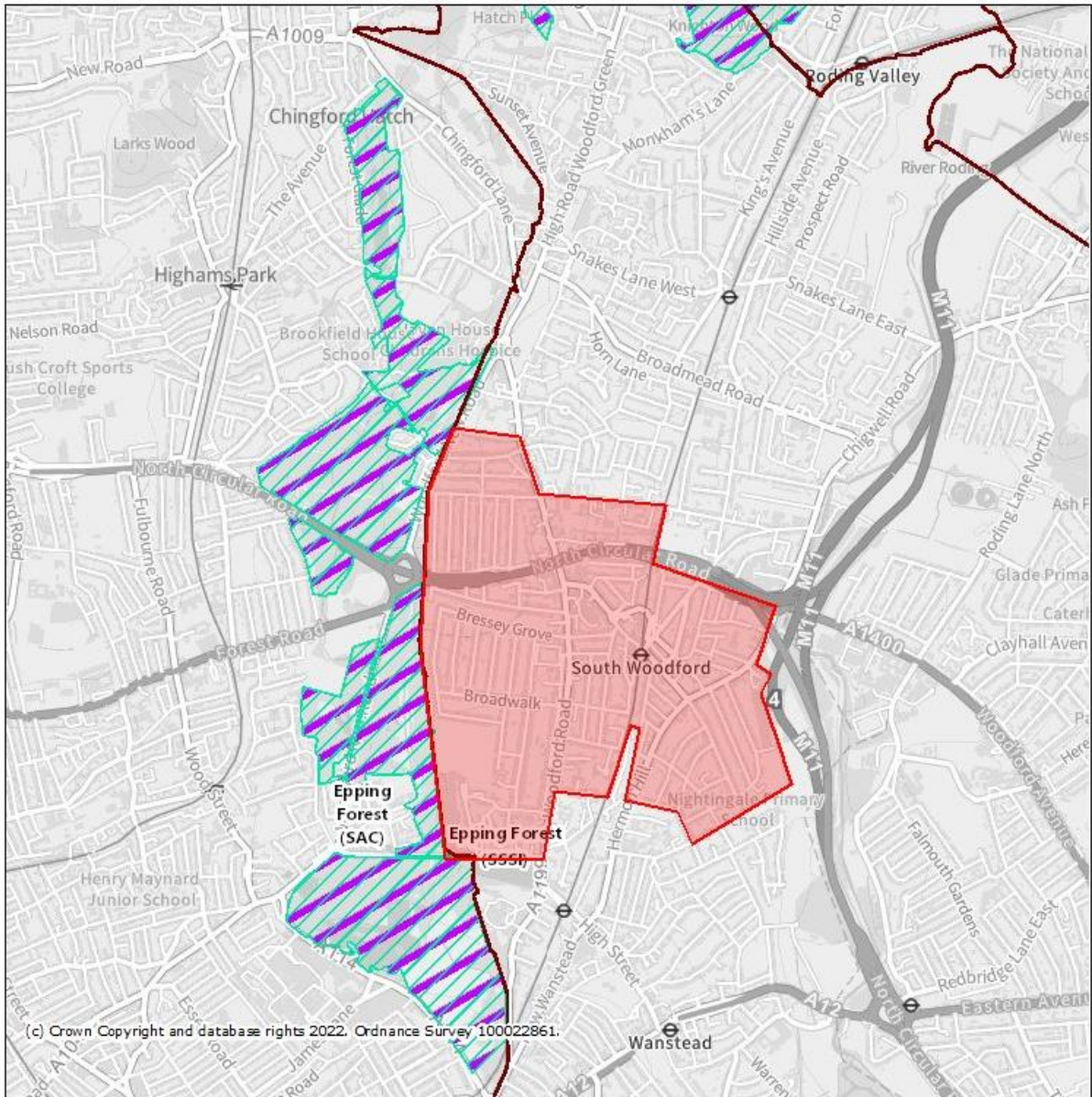
water) (6%); bogs, marshes, water fringed vegetation and fens (0.2%); heath, scrub, maquis and garrigue and phygrana (3.9%); dry grassland and steppes (20%); and broad-leaved deciduous woodland (70%)¹⁰.

- Epping Forest SSSI comprises 1728 ha of land and is recognised as one of the few remaining large-scale examples of ancient wood-pasture in lowland Britain, with significant areas of ancient semi-natural woodland, old grassland plains and scattered woodland. According to the latest condition survey, 35.48% of the SSSI is in favourable condition, 48.17% is in unfavourable-recovering condition, 14.53% is in unfavourable-no change and 1.83% is in unfavourable-declining condition¹¹.

2.16 The location of these sensitive areas are highlighted in **Figure 2.1** below.

¹⁰ JNCC (2015) 'Epping Forest Designated Special Area of Conservation (SAC)' can be accessed [here](#).

¹¹ Natural England (no date) 'Epping Forest SSSI' can be accessed [here](#).



<p>Legend</p> <ul style="list-style-type: none"> Parishes (GB) Sites of Special Scientific Interest (England) Special Areas of Conservation (England) 	<p>0 0.8 1.6</p> <p style="text-align: center;">km</p> <p>Projection = OSGB36 xmin = 533400 ymin = 187400 xmax = 546800 ymax = 193700</p> <p>Map produced by MAGIC on 31 May, 2022. Copyright resides with the data suppliers and the map must not be reproduced without their permission. Some information in MAGIC is a snapshot of the information that is being maintained or continually updated by the originating organisation. Please refer to the metadata for details as information may be illustrative or representative rather than definitive at this stage.</p>
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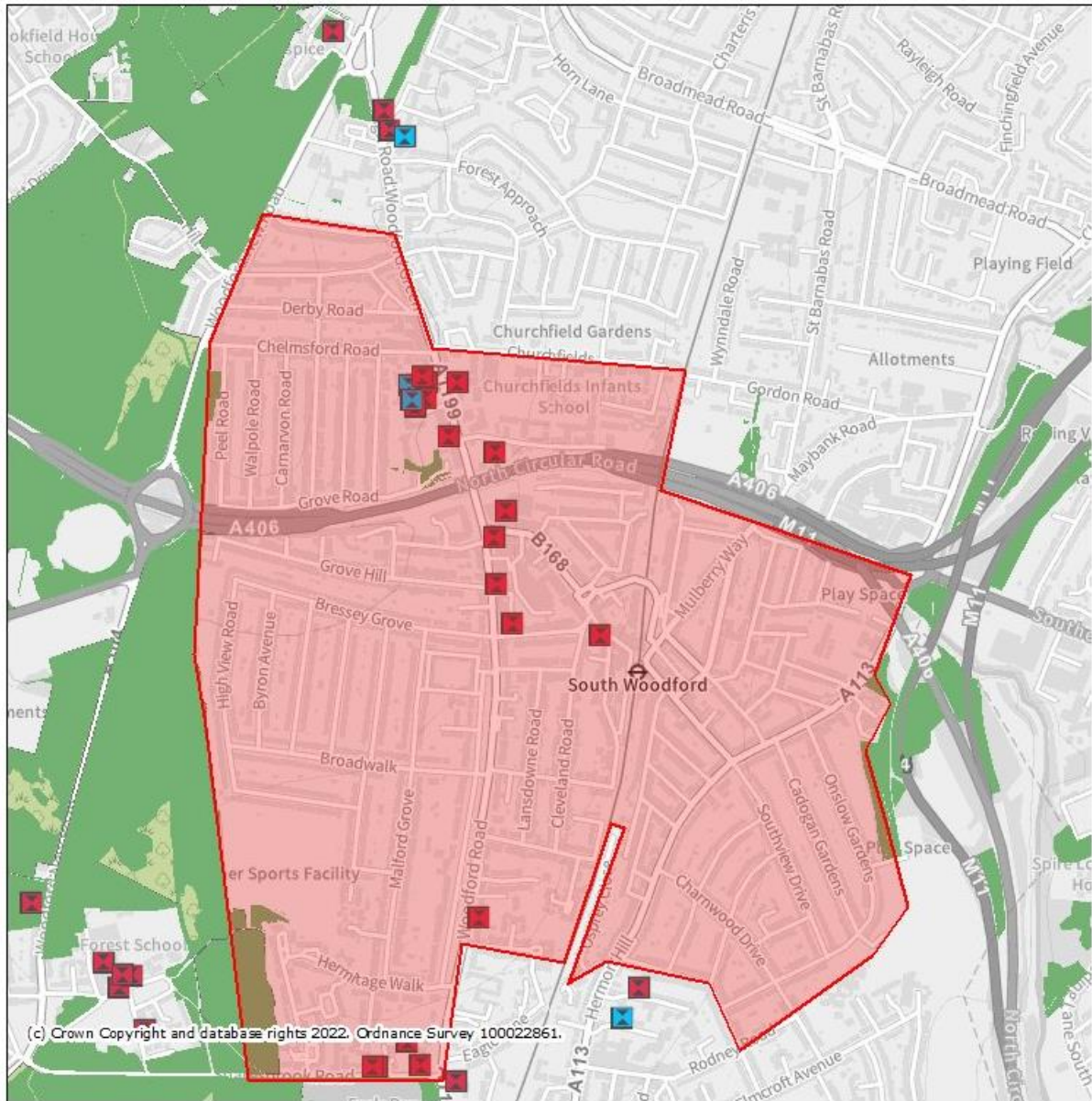
Figure 2.1: Sensitive areas in relation to the neighbourhood area.

2.17 In terms of other key environmental assets (i.e., those which are not defined as 'sensitive areas' by the PPG), these include in the neighbourhood area¹²:

- 21 statutory listed buildings - 19 Grade II and two Grade II* listed buildings.
- Eight local listed buildings.
- Three conservation areas within the neighbourhood area and one adjacent: Snaresbrook, George Lane, South Woodford, and Woodford Green (adjacent).
- Three archaeological priority areas overlapping and one adjacent: Woodford Hall, St Marys Woodford, River Roding, and Elmhurst Gardens (adjacent); and
- Biodiversity Action Plan (BAP) Priority Habitats, primarily areas of ancient woodland, deciduous woodland, and wood pasture and parkland.

2.18 The location of these environmental assets are shown in **Figure 2.2** and **Figure 2.3** below.

¹² London Borough of Redbridge (2022) 'imap' can be accessed [here](#).



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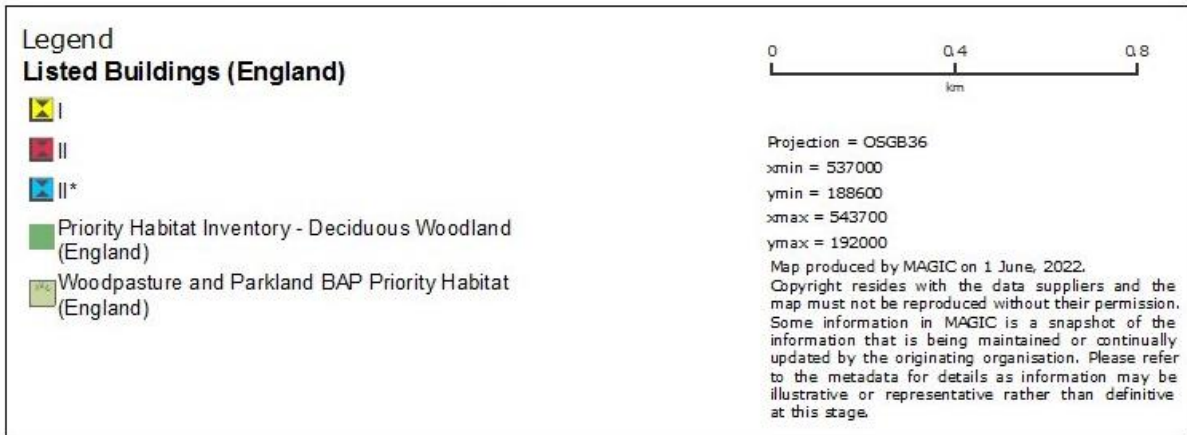


Figure 2.2: Statutory listed buildings and BAP Priority Habitats within and within proximity to the neighbourhood area

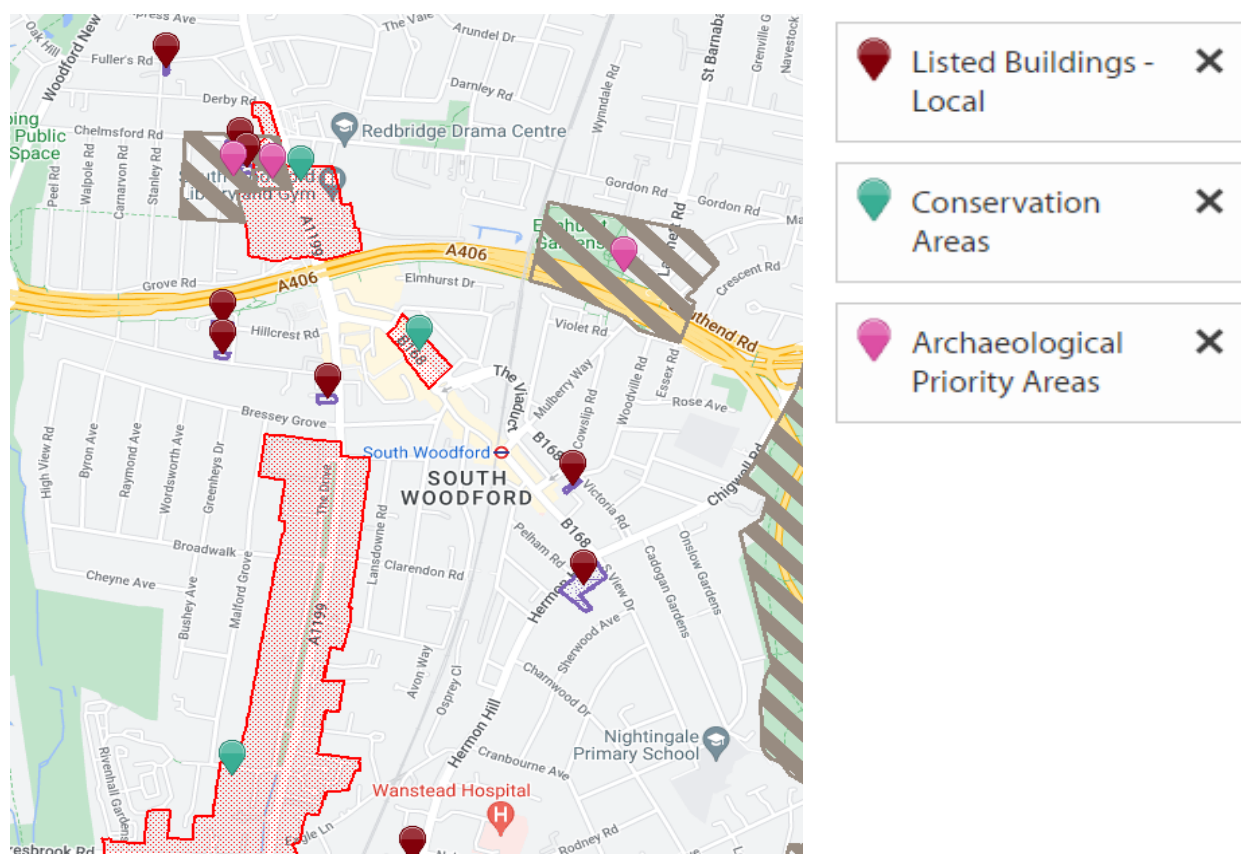


Figure 2.3: Local listed buildings, conservations areas and archaeological priority areas within the neighbourhood area

2.19 Additionally, the neighbourhood area also overlaps with a small section of Metropolitan Green Belt land¹³, including locations such as Woodford Green and Roding Valley Park. Most of this land is located along the eastern and western boundaries of the neighbourhood area.

2.20 Fluvial flood risk¹⁴ associated with the River Roding is also present in the neighbourhood area, specifically within the eastern section and along the A406 North Circular Road and M11.

2.21 The entirety of Redbridge Borough has been designated as an Air Quality Management Area (AQMA) since 2003¹⁵ due to exceedances in the national air quality objectives for particulates (PM₁₀) and nitrogen dioxide (NO₂).

¹³ London Green Belt Council (2023): 'Metropolitan Green Belt Map' can be accessed [here](#)

¹⁴ GOV.UK (2023) 'Flood Map for Planning' can be accessed [here](#)

¹⁵ London Borough of Redbridge (2022) 'Air quality' can be accessed [here](#).

3. SEA screening assessment

- 3.1 **Table 3.1** discusses the significance of the potential environmental effects of the SWNP, and their likely significance.
- 3.2 This SEA screening assessment has been prepared based on the latest available information about the SWNP’s progress to date, as provided by the Neighbourhood Forum. This includes the proposed vision, aims, and topic areas for the SWNP, along with responses to a neighbourhood plan questionnaire provided by Redbridge Council to request further information to support the screening process (which was completed by the Neighbourhood Forum in October 2022).¹⁶

Table 3.1: Potential environmental effects of the SWNP and their significance

SEA Topic	Discussion of potential effects and their significance	Is there the potential for a significant effect (Yes/No)?
Biodiversity, flora, and fauna	<p>Internationally and nationally designated sites within and in proximity to the neighbourhood area includes Epping Forest SAC and Epping Forest SSSI. Locally important sites include areas of priority habitats (primarily areas of ancient woodland, deciduous woodland and wood pasture and parkland). Most of the neighbourhood area is also within buffer zone(s) and SSSI Impact Risk Zones associated with these designations.</p> <p>Whilst these designations do offer sensitivities, given the SWNP is not seeking to allocate housing or employment uses, this will limit the scope for significant effects on biodiversity as a result of potential Neighbourhood Plan proposals. Potential sensitivities to internationally protected sites for biodiversity are further discussed within the HRA test of likely significant effects (screening discussion) presented in Chapter 5 of this Screening Opinion.</p> <p>Alongside, a key facet of the evolving plan is the enhancement of green infrastructure networks in the neighbourhood area and the protection of key features and areas of biodiversity importance. This will help limit effects on biodiversity and support biodiversity improvements. In light of this evidence, effects on biodiversity are <u>unlikely to be significant</u>.</p>	No
Population and human health	<p>A key focus of the SWNP is to improve the quality of life of residents, including improving the public realm, town centre regeneration, and green infrastructure enhancements. Whilst the benefits which arise for residents from a well-designed neighbourhood plan have the potential to be wide-ranging, these are <u>not deemed to be significant</u> with regards to the SEA Regulations and their requirements.</p>	No

¹⁶ The draft vision and aims document and the questionnaire responses provided by the Neighbourhood Forum will be circulated to the statutory consultees for their consideration alongside this Screening Opinion.

SEA Topic	Discussion of potential effects and their significance	Is there the potential for a significant effect (Yes/No)?
Soil	<p>According to the Predictive Best and Most Versatile (BMV) Land Assessments for London and the South East¹⁷ the neighbourhood area is wholly in use for urban/industrial or non-agricultural purposes.</p> <p>As such, the effect on soil resources (i.e., areas of productive agricultural land) is <u>deemed to be insignificant</u> with regards to the SEA Regulations and their requirements.</p>	No
Water	<p>Development proposals influenced by neighbourhood plan policies may lead to very limited changes in water demand in the neighbourhood area. However, in the context of water management within London, and wider population pressures, the effect on water resources is <u>deemed to be insignificant</u>.</p> <p>Similarly, as the SWNP is not seeking to allocate sites, impacts on water quality in the neighbourhood area associate with SWNP proposals are also <u>unlikely to be significant</u>.</p>	No
Air	<p>The entirety of Redbridge Borough has been designated as an AQMA due to exceedances of national air quality objectives for particulates (PM₁₀) and nitrogen dioxide (NO₂).</p> <p>Given that the SWNP is not proposing to allocate sites, the plan proposals are unlikely to significantly increase traffic and congestion in the neighbourhood area (i.e., in locations with sensitivities for air quality, including the Redbridge AQMA). As such, effects on air quality as a result of the SWNP are <u>unlikely to be significant</u>.</p>	No
Climatic factors	<p>In terms of climate change mitigation, the SWNP is not proposing to allocate land for development. As such the SWNP will not lead to increases in greenhouse gas emissions from a significant increase in the built footprint of the neighbourhood area, beyond the levels which have previously been assessed as part of the sustainability process undertaken for the Adopted Local Plan. The SWNP also supports Redbridge Council's policy of becoming net zero by 2030. This will help limit potential increases in greenhouse gas emissions that may arise as a result of the SWNP.</p>	No

¹⁷ Natural England (2017) 'Likelihood of Best and Most Versatile (BMV) Agricultural Land – Strategic scale map London and the South East (ALC019)' can be accessed [here](#).

SEA Topic	Discussion of potential effects and their significance	Is there the potential for a significant effect (Yes/No)?
Climatic factors (continued)	<p>Parts of the neighbourhood area are at significant risk of flooding. This is associated with the presence of the River Roding. Whilst it is considered that statutory requirements (including the requirements of the NPPF) will help ensure that flood risk is addressed through new development proposals, the SWNP is also likely to facilitate green infrastructure enhancements within the neighbourhood area. This will indirectly support and protect the natural functioning of the River Roding. When combined with the lack of allocations to be proposed through the SWNP, significant impacts on flood risk are not anticipated.</p> <p>Effects in relation to climate change mitigation and adaptation are therefore <u>unlikely to be significant</u> with regard to the SEA Regulations and their requirements</p>	No
Material assets	<p>The SWNP is unlikely to lead to significant increases in the area's waste management requirements given the lack of allocations it is bringing forward. Effects will be further limited by statutory requirements regarding waste management, including through the provisions included in the Joint Waste Development Plan.</p> <p>No mineral sites are likely to be affected as a result of the SWNP.</p> <p>Effects are therefore <u>unlikely to be significant</u> in the context of the SEA Regulations and their requirements.</p>	No
Cultural heritage	<p>The SWNP does not seek to allocate sites for housing or employment land.</p> <p>Alongside policies within the Adopted Local Plan, the SWNP is likely to include a range of provisions which will conserve and enhance the fabric and setting of the historic environment, including designated and undesignated assets and areas within the neighbourhood area. This is further supported by the design principles and criteria to be included within design codes accompanying the SWNP, which will likely have a close focus on protecting and enhancing historic townscape character and the setting of the historic environment, and on implementing high quality design within the neighbourhood area.</p> <p>As such, any effects are <u>unlikely to be significant</u> in the context of the SEA Regulations and their requirements.</p>	No

SEA Topic	Discussion of potential effects and their significance	Is there the potential for a significant effect (Yes/No)?
Landscape and townscape	<p>There are no nationally designated landscapes in the vicinity of the neighbourhood area (such as AONBs or National Parks). Whilst there are sections of Metropolitan Green Belt land located along the eastern and western boundaries of the neighbourhood area, these areas are unlikely to be impacted by the plan proposals. Crucially, the SWNP is not seeking to allocate sites for housing or employment land.</p> <p>In order to achieve the vision and aims of the SWNP, it is anticipated that neighbourhood plan policies (supported by the provisions of the design codes which are being prepared to accompany the SWNP) will likely have a close focus on protecting and enhancing townscape character, and on implementing high quality design within the neighbourhood area.</p> <p>As such, any effects are <u>unlikely to be significant</u> in the context of the SEA Regulations and their requirements.</p>	No

4. Summary of SEA screening

- 4.1 This screening opinion has considered whether the SWNP is likely to lead to significant environmental effects in conjunction with the SEA Regulations.
- 4.2 The screening has considered a number of potential environmental effects that may arise as a result of the SWNP. Whilst some limited environmental effects have the potential to take place as a result of the SWNP, it is considered that these are unlikely to be significant in the context of the SEA Regulations and their requirements.
- 4.3 The SEA topics where effects have the most potential to be significant relates to biodiversity and the historic environment. This relates to the significant historic environment and biodiversity constraints present within and within proximity to the neighbourhood area, including the presence of Epping Forest SAC, Epping Forest SSSI, listed buildings, three conservation areas, and archaeological priority areas. However, as the SWNP is not seeking to allocate sites¹⁸, the SWNP is unlikely to have significant adverse effects on the fabric and/or setting and significance of key heritage assets, or on the key features affecting the integrity of the SAC and SSSI present locally.
- 4.4 Of key relevance here is that that the Neighbourhood Plan is being brought forward within the wider strategic context provided by the Adopted Local Plan, which has already been subject to a sustainability appraisal process. While there will be housing development within the neighbourhood area over the plan period, the quantum has already been assessed through the sustainability appraisal process completed for the Adopted Local Plan, in combination with growth elsewhere in the borough. Since the SWNP will not include any site allocations, the impacts of specific development sites can only be assessed through the development control process as applications are made.
- 4.5 In addition, a central element of the Neighbourhood Plan's vision and aims is to limit potential environmental effects and secure environmental enhancements. In this respect, the neighbourhood planning policies (once drafted) will seek to shape development which may come forward during the plan period without allocating sites. This is likely to include relating to housing (type, tenure, and affordability), and in terms of design (supported by design codes), town centre regeneration, public realm improvements, green infrastructure enhancements, community value, climate change mitigation and adaptation, environmental protection, and economic vitality. This will further limit the potential for significant environmental effects.
- 4.6 For these reasons, it is considered that the Neighbourhood Plan is not subject to the requirements of the SEA Regulations. As such, **a full SEA process meeting the requirements of the SEA Regulations is not deemed to be required to accompany the development of the SWNP.**
- 4.7 Additionally, **an Appropriate Assessment will not be required for the SWNP under the Habitats Directive.** This is further considered in **Chapter 5** of this Screening Opinion (presented below).

¹⁸ DLUHC (February 2022): Chief Planner's Newsletter, February 2022 "Strategic Environmental Assessment for Neighbourhood Plans: Timely and effective screening" [online] accessible [here](#)

5. Habitats Regulations Assessment: Test of Likely Significant Effects

- 5.1 This chapter of the Screening Opinion is intended to inform the Habitats Regulations Assessment (HRA) Test of Likely Significant Effects (known as HRA Screening) decision undertaken by the London Borough of Redbridge Council for the South Woodford Neighbourhood Plan.
- 5.2 The objective of this assessment is to identify any likely significant effects arising from the Proposed Development on international sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs)) including, as a matter of Government policy, Ramsar sites, either in isolation or in combination with other plans and projects, and to undertake appropriate assessment and advise on mitigation where necessary. Epping Forest SAC is adjacent to the Neighbourhood Area, while Lee Valley SPA/Ramsar site is 3.8km west of the Neighbourhood Area.
- 5.3 The need for HRA is set out within the Conservation of Habitats & Species Regulations 2017 (as amended; see **Figure 5.1** below).

Conservation of Habitats and Species Regulations 2017 (as amended)

The Regulations state that:

“A competent authority, before deciding to ... give any consent for a plan or project which is likely to have a significant effect on a European site ... shall make an appropriate assessment of the implications for the site in view of that sites conservation objectives... The authority shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site”.

With specific reference to Neighbourhood Plans, Regulation 106(1) states that:

“A qualifying body which submits a proposal for a neighbourhood development plan must provide such information as the competent authority [the Local Planning Authority] may reasonably require for the purpose of the assessment under regulation 105... [which sets out the formal process for determination of ‘likely significant effects’ and the appropriate assessment].”

Figure 5.1: The legislative basis for Appropriate Assessment

- 5.4 The first stage of any HRA is a Likely Significant Effect (LSE) test - essentially a risk assessment to decide whether the full subsequent stage known as AA is required. The essential question is: “Is the Plan, either alone or in combination with other relevant projects and plans, likely to result in a significant effect upon European sites?” and this decision must take into account other plans and projects. The objective is to ‘screen out’ those plans and projects that can, without any detailed appraisal, be said to be unlikely to result in significant impacts upon European sites, usually because there is no mechanism for an interaction with European sites. This task is undertaken in this section of the Screening Opinion.

- 5.5 The Redbridge Local Plan HRA did not identify any likely significant effects on Lee Valley SPA/Ramsar site from housing and employment growth in the borough. Therefore, that European site does not require further consideration. Epping Forest SAC receives a great many visits per year (estimated at over 4 million across the Forest as a whole including the area covered by the SAC) and discussions with the City of London Corporation have identified long-standing concerns about increasing recreational use of the Forest resulting in damage to its interest features. A programme of detailed formal visitor surveys was undertaken in 2017 and 2019 and this identified that 75% of visitors to Epping Forest SAC arise from within approximately 6km (6.2km) of the site. This is relevant because the 75th percentile is often used to define the core recreational catchment of an internationally important site within which mitigation is typically required.
- 5.6 Mitigation for recreational pressure impacts takes the form of a Recreation Management Strategy (Strategic Access Management and Monitoring) for the SAC (which is being co-ordinated by Epping Forest District Council and City of London Corporation with advice from Natural England) and/or delivery of net new semi-natural recreational greenspace (Strategic Alternative Natural Greenspace) to draw visitors away from the SAC. London Borough of Redbridge identifies on their website¹⁹ that *'Following Cabinet approval on 8 March 2022, the Council is applying the Epping Forest SAC SAMMs tariff of £255.84* per new unit across the 0-6.2km Zone of Influence of Epping Forest in Redbridge, in addition to an administration fee (see below). The tariff is applicable to decisions for all new residential units approved (on grant of planning permission) from 1 April 2022 onwards'*. It is also stated that *'The Council currently requires major developments over 100 units which fall within the 0 – 6.2km Zone of Influence to pay for a package of SANGs measures within Redbridge'*. Clearly South Woodford falls well within the mitigation zone and mitigation will therefore be required for net new housing delivered within the Neighbourhood Area.
- 5.7 South Woodford Neighbourhood Plan Forum are in the early stages of preparing their Neighbourhood Plan and as such have no draft policies. However, they have produced a Vision and Aims for the Neighbourhood Plan which describes what the Neighbourhood Plan is intending to achieve. **In particular, it should be noted that the Forum does not intend to allocate any housing or employment sites in the Neighbourhood Area. Rather they intend to shape the design, development and delivery of sites already allocated through the Redbridge Local Plan via a design code.**
- 5.8 South Woodford Neighbourhood Forum's vision for the Neighbourhood Plan is as follows:
- *South Woodford will be a clean, green, and safe environment that is well-managed and maintained for all those who live, work, learn and visit. It will be 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.*
 - *Our town centre will be even busier and more vibrant with a great shopping experience for all.*

¹⁹ <https://www.redbridge.gov.uk/planning-and-building/planning-policy/local-plan>

- *Our green spaces will be enhanced and an environmentally sensitive culture will be fostered to protect and improve our amenities for everyone's benefit.*
- *The creation of well-designed and well-built structures that benefit all.*

5.9 The Neighbourhood Plan vision is to be achieved as follows:

- *Building a stronger community, fostering a collaborative and inclusive approach.*
- *Creating a clean and safe environment.*
- *Engendering a coherent and sustainable approach to development to support Redbridge's policy of becoming net zero by 2030.*
- *Ensuring a holistic approach to planning and infrastructure improvements.*
- *Improving and increasing access to green spaces within the community, encouraging residents to support biodiversity and Redbridge's Grow Zones initiative.*
- *Enhancing the vibrancy of the town centre with a great variety of businesses.*
- *Supporting local businesses through the established South Woodford Business Forum*
- *Preserving the heritage of South Woodford.*

5.10 The Neighbourhood Plan will contain the following topic areas:

- Employment & businesses (retail & hospitality)
- Sport & Leisure
- Crime Prevention
- Facilities (to include childcare, young people & elderly)
- Housing & planning (heritage)
- Street Scene (green spaces)
- Transport Climate Change (environmental policy)
- Health & Education

5.11 However, although policies will cover each of these topic areas, they will be concerned with improving the environment and experience of residing in South Woodford and managing and shaping development in South Woodford rather than delivering or allocating housing or employment sites. Given this, there is no reason to conclude that policies in the South Woodford Neighbourhood Plan, once drafted, would conflict with the need to protect the Epping Forest SAC or interfere with delivery of the mitigation strategies identified for the SAC.

5.12 Since the Neighbourhood Plan would present no mechanism for a likely significant effect on any European sites, it will not do so in combination with other projects and plans. This will remain the case provided South Woodford Neighbourhood Plan does not make housing or employment allocations or contains other policies that would seek to deliver or allocate development beyond that allocated in the Redbridge Local Plan.

5.13 Therefore, no appropriate assessment is required for this Neighbourhood Plan.

Appendix A – European site information

Epping Forest SAC

Part of the Epping Forest SAC is located within Epping Forest District. Approximately 70% of the 1,600-hectare site consists of broadleaved deciduous woodland, and it is one of only a few remaining large-scale examples of ancient wood-pasture in lowland Britain. Epping Forest SAC supports a nationally outstanding assemblage of invertebrates, a major amphibian interest and an exceptional breeding bird community.

Reasons for Designation²⁰

Epping Forest qualifies as a SAC for both habitats and species. Firstly, the site contains the Habitats Directive Annex I habitats of:

- Beech forests on acid soils with *Ilex* and sometime *Taxus* in the shrublayer.
- Wet heathland with cross-leaved heath; and
- Dry heath

Secondly, the site contains the Habitats Directive Annex II species Stag beetle *Lucanus cervus*, with widespread and frequent records.

Current Pressures and Threats²¹

- Air pollution
- Under grazing
- Public disturbance
- Changes in species distribution
- Inappropriate water levels
- Water pollution
- Invasive species
- Disease

Conservation Objectives

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:

- The extent and distribution of qualifying natural habitats and habitats of qualifying species

²⁰ JNCC (2015) Natura 200 Standard Data Form: Epping Forest SAC

²¹ Natural England (2015). Site Improvement Plan: Epping Forest SAC

- The structure and function (including typical species) of qualifying natural habitats
- The structure and function of the habitats of qualifying species
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely
- The populations of qualifying species, and,
- The distribution of qualifying species within the site

Lee Valley SPA and Ramsar Site

The Lee Valley comprises a series of embanked water supply reservoirs, sewage treatment lagoons and former gravel pits along approximately 24 km of the valley. These waterbodies support internationally important numbers of wintering gadwall and shoveler, while the reedbeds support a small but internationally important population of bittern. In addition to the ornithological interest, the site also qualifies as a Ramsar site on account on rare and scarce plants and invertebrates present.

The Lee Valley SPA/Ramsar consists of four Sites of Special Scientific Interest, of which Turnford and Cheshunt Pits SSSI, Rye Meads SSSI and Amwell Quarry SSSI all lie on the Hertfordshire/Essex border. Walthamstow Reservoirs SSSI lies within London Borough of Waltham Forest. The Special Protection Area is managed by the Lee Valley Regional Park Authority and by Thames Water.

Reasons for Designation

The Lee Valley site is designated as an SPA²²: for its Birds Directive Annex I and Ramsar site under criterion 6²³ for species that over-winter, and these are:

- Bittern *Botaurus stellaris*;
- Gadwall *Anas strepera*;
- Shoveler *Anas clypeata*.

In addition, the site qualifies as a Ramsar under criterion 2²⁴, by supporting the nationally scarce plant species whorled water-milfoil *Myriophyllum verticillatum* and the rare or vulnerable invertebrate *Micronecta minutissima* (a water-boatman).

Current Pressures and Threats²⁵

- Water pollution
- Hydrological changes
- Public disturbance
- Inappropriate scrub control
- Fishing
- Air pollution

²² <http://jncc.defra.gov.uk/page-2047-theme=default> [accessed 09/11/2017]

²³ <http://jncc.defra.gov.uk/pdf/RIS/UK11034.pdf> [accessed 09/11/2017]

²⁴ Ibid

²⁵ <http://publications.naturalengland.org.uk/file/5788502547496960> [accessed 09/11/2017]

- Inappropriate cutting and mowing
- Invasive species

Conservation Objectives²⁶

With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features'), and subject to natural change;

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;

- 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.

²⁶ <http://publications.naturalengland.org.uk/file/5168095937167360> [accessed 09/11/2017]

