

Redbridge Local Plan – Examination of Redbridge Local Plan 2015-2030

Note setting out additional information in response to Issue 5 (viii)

1 Introduction

1.1 Inspector's questions

This Note provides additional information in response to a question identified by the Inspector relating to Issue (5): ***Are the policies for housing growth and affordable housing (Policies LP2 & LP3) justified, deliverable and consistent with national policy?***

Question 5 (viii): Will the 2km buffer zone around the Epping Forest SAC affect the deliverability of developments within that area? What mitigation measures are likely to be possible?

Following consideration of this question at the Examination, the Inspector requested further details of the mitigation measures which could reasonably be required and delivered within the 2km buffer zone, with particular reference to the ca. 500 dwellings provided for within the South Woodford Investment and Growth Area.

This Note considers in more detail the following matters, which arise from the Inspector's request:

- How the need for mitigation measures will be assessed in accordance with the Habitats Regulations, and as provided for within Policy LP39
- How the characteristics and sensitivity of Epping Forest SAC may influence assessment of mitigation requirements necessary to avoid likely significant effect;
- The potential for 'SANG' type mitigation in South Woodford Investment and Growth Area; and
- The potential for 'SAMM' type mitigation in South Woodford IGA.

2 Nature and deliverability of mitigation measures

2.1 Process for assessment of likely significant effect and mitigation

The need for assessment of likely significant effect will be determined in accordance with Article 6 of the Habitats Directive and regulation 61 of the Habitats Regulations for developments within 2km of Epping Forest SAC, as set out in Policy LP39, and explained in section 5.3 of the HRA report.

This assessment is most appropriately carried out at the masterplanning stage of development, which on the one hand avoids the use of a ‘one size fits all’ approach (a risk of a prescriptive approach at Local Plan level), while on the other avoids risks of ‘salami-slicing’ (failure to take account of individually insignificant in-combination effects by sequential assessment – see HRA report, paragraph 5.3.6).

2.2 Sensitivities of Epping Forest relevant for consideration of likely significant effect and mitigation needs

The qualifying features and sensitivities of Epping Forest SAC are set out in the HRA report. As noted in the examination, while the SAC is sensitive to increased recreational pressure, the site can be regarded as relatively less sensitive to marginal increases in visitors, compared to, for example

- SPA sites designated for ground-nesting birds (e.g. Thames Basin Heaths SPA, Ashdown Forest SPA);
- Coastal SPA sites designated for non-breeding birds occupying foreshore or estuarine habitats (e.g Solent SPA, Northumbrian Coast SPA).

In these types of site marginal increases in visitor numbers can have a directly negative effect on qualifying species, particularly from dog walking. Mitigation provisions in these circumstances are frequently therefore oriented towards increasing local provision geared specifically at the needs of dog-walkers. This generally takes the form of SANGS or improvement to quality and capacity of other dog walking areas. In contrast, Epping Forest SAC is sensitive to generalised recreational pressure from increased footfall. Evidence of this can be seen in localised erosion of vegetation in areas of high footfall, such as the area around Highams Park lake (in Waltham Forest Borough, west of Woodford) – see photo overleaf. As such, it seems that mitigation of the impact of greater visitors may reasonably be expected to take the form of management measures, including directing visitors to particular parts of the Forest and generally controlling visitor behaviour rather than

seeking to divert visitors away from the Forest, for example through the provision of SANGS.

The Epping Forest Visitor Survey 2014 document indicates that the management of the Forest aims to fulfil both preservation of the site's ecological value and community benefits (see Section 3 introduction, p.5), with current baseline visit numbers estimated at over 4.2 million per annum (see p.3; note this figure includes areas such as Wanstead Flats and Bush Wood which are outside the SAC). The Visitors Survey does not suggest that the Conservators are seeking to, or recognise any need to, seek to limit or reduce overall numbers of visitors to the Forest. Indeed, the Visitor Survey approach indicates that parts of the Forest are actively promoted to visitors to act as 'honey pot' sites and relieve pressure on areas considered to be more sensitive. Moreover, the Forest website encourages people to visit the Forest (<https://www.cityoflondon.gov.uk/things-to-do/green-spaces/epping-forest/Pages/default.aspx>).



Localised erosion near lake, Highams Park (area within SAC)

Although Epping Forest SAC's Site Improvement Plan (SIP) identifies recreational impacts as a 'pressure' (see HRA Table 4.1), Natural England's Condition Assessments (HRA, Table 3.3) only identify one component SSSI unit within 2km of the Borough where recreational pressure is listed as a reason for unfavourable condition. This is Unit 136, the southernmost part of the SAC (see HRA report Fig. 3.2, p. 15 for location).

2.3 Potential for SANG in South Woodford Investment and Growth Area

As explained above, it is doubtful that SANG will generally be necessary to mitigate the effect of increased use of Epping Forest SAC. The SANG (Suitable Alternative Natural Greenspace) mitigation principles were initially established in the context of accommodating multiple housing developments within the visitor catchment of Thames Basin Heaths SPA. They have been applied to a wide range of other European designated sites, but not all of their design principles are necessarily applicable in each case. As noted, the need for an emphasis on dog walking, expressed in terms such as '*allowing pet owners to let dogs run freely over a significant part of the walk*'¹ does not have to be a priority in the case of Epping Forest SAC.

Principles which *are* generally applicable to the deliver of SANG include:

- Provision of at least 0.8ha of open space per 1000 population;
- Naturalistic landscape which can include wooded and semi-wooded elements, but which also includes a more open landscape where visitors can feel safer;
- Easily accessible on foot, ideally with linking walking routes (in more rural areas sites with car parking facilities catering for longer range visitors were also included in the definition of accessibility);
- Good signage and a high (but not necessarily formal) standard of footpath surfacing.

SANG provided as part of a housing development or area masterplan can *either* be new or newly-accessible open space, *or* represent a significant improvement in quality and accessibility of existing open space.

Redbridge Borough Council's Open Space Study (LUC, 2016)² considers open space provision and quality in the South Woodford area. This study identifies 135.97ha of open spaces as 'green corridor'; 241.18ha of natural and semi-natural greenspace; and 135.37ha of parks and gardens (Open Space Study Table 3.2). Figure 3.1 of the study identifies the green corridor as the Roding Valley (area 160). Natural and semi-natural greenspace includes two areas on the fringe of Epping Forest (Eagle Pond and woodland north of Snaresbrook Road), both identified as Walthamstow Forest (area 199), and both *outside* the SAC boundary. Parks and gardens include Elmhurst Gardens (area 92). All of these are identified in Figure 3.14 of the Strategy as having 'potential for enhancements in terms of

¹ Bracknell Forest Council (2008). *Guidelines for the creation of Suitable Accessible Natural Green Space (SANGS)*

² Land Use Consultants (2016). *Redbridge Open Space Study*. July 2016.

making space for people / informal recreation'. This indicates that there is potential for meaningful improvements which would qualify as SANG provision, should the need to delivery SANG arise in association with development in the South Woodford IGA or in the western part of the Borough, closest to Epping Forest.

Of these sites, the area with the greatest potential is likely to be Roding Valley; the site has good access to at some of the larger proposed development sites, and is within 400m of parts of South Woodford centre. It provides potential for longer walks, and has a semi-natural character. The non-SAC parts of Epping Forest also have potential for access / visitor improvements, in line with the Forest's approach to visitor management of directing visitors to 'honeypot' or less sensitive areas. However, while this may be an appropriate area to benefit from SAMM contributions, it is better generally to direct alternative provision in the opposite direction to the SAC boundary.

Other measures which could be potentially regarded as contributing to SANG include signage directing residents from Improvement Areas to open spaces; this could include on-street walking routes, for example like the alternative (to Euston Road) Euston to King's Cross Green Walking Route (<https://www.spacehive.com/kings-cross-kq-knowledge-route>).

It follows therefore that there are ready opportunities to deliver SANG in the form of qualitative improvements to existing open space in the South Woodford area, should the need to do so arise.

2.4 The potential for SAMM-type mitigation in South Woodford

There are no obvious impediments to a SAMM-type of solution, where a developer will make contributions aimed at offsetting recreational impacts in areas of Epping Forest most likely to be visited by residents of South Woodford. Indeed, the Conservator's Visitor Survey indicates that it is pursuing a programme of visitor management, to which SAMM could meaningfully contribute.

In most of the areas of the SAC such as Gilbert's Slade (the area of woodland and grassy glades west of South Woodford and south of the North Circular) the path network is informal, with no surfacing, and no signage. This leads to braiding in places as desire lines separate and merge back. While it is understood the lack of formal path treatments is deliberate, to retain the natural character of the Forest, there may be scope for signage or interpretation aimed at encouraging visitors to stay on principal routes. There is also a lack of signage at entrances to the SAC, including those on major roads such as the A104 near North Circular Road.



Entrance to Epping Forest (north end of Gilbert's Slade) at A104 / North Circular Roundabout

The Epping Forest Conservators would be the organisation responsible for identifying appropriate management requirements and implementing them through developer receipts. Measures would have to be compatible with the Epping Forest Management Plan, which it is understood is currently under review, but would also have to be relevant and compatible with the conservation objectives and Site Improvement Plan for the SAC (and therefore involving an input from Natural England). In particular, management measures must aim to provide a lasting benefit in making the Forest more resilient to predicted increases in recreational use consequential on local population increases.

Potential Further Modification to Policy LP39

The Council has suggested a modification to the text at para.6.6.2, which accompanies policy LP39, to clarify the approach which will be required to be followed in the identification of mitigation measures as part of any Habitats Regulations screening and, where engaged, appropriate assessment. By these modifications, the Council makes clear that it would generally expect mitigation to take the form of SANG or SAMM. It is considered that this modification should be made to make the plan effective.

Add to end of para.6.6.2:

As part of any screening assessment and, where required, appropriate assessment carried out under the Conservation of Habitats and Species Regulations 2010, the Council will consider any mitigation and/or compensation measures proposed to address potential impact on the SAC. Where required, such measures would be expected generally to comprise the provision of or contribution towards provision of Suitable Alternative Natural Greenspace (SANG) and/or a contribution towards Strategic Management and Monitoring (SAMM) measures. The extent to which mitigation and/or compensation is required and, if so, in what form, should be addressed as part of any Habitats Regulations screening and, where required, appropriate assessment. If SANG is required, the Council will consider, as part of an Habitats Regulation screening or appropriate assessment, improvement to existing open space within and beyond the borough, including improvement of open space at Roding Valley. If SAMM is required, applicants should in the first instance consider contributions to, or facilitating the implementation of, management measures proposed by the Conservators of Epping Forest, and are advised, as part of the preparation of a Habitats Regulation screening or appropriate assessment, to liaise at an early stage with the Conservators of Epping Forest to establish what opportunities for mitigation are available.

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