



Redbridge Local Plan

Habitats Regulations Assessment -
Addendum

Assessment of effects of Main and Additional
Modifications, October 2017

Prepared for London Borough of Redbridge

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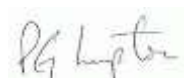

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Contents

1	Introduction	3
2	Screening of modifications and amendments	4
2.1	Main modifications	4
2.3	Additional modifications	5
3	Summary of effects	6
3.1	Development policies	6
3.2	Conservation policies	6
4	Conclusions	7

1 Introduction

This document provides an Addendum to the submitted Habitats Regulations Assessment (HRA) of the Redbridge Local Plan 2015-2030.

Modifications to the Local Plan made following the Examination hearings and the Inspector's post hearing advice have been re-screened to determine their likely effect on European conservation sites, and determine whether the conclusions set out in the HRA remain valid.

Changes to policies which were previously assessed as neutral are not considered in detail below, although all changes have been considered to determine whether any additional policies may now have a negative effect; the addendum focusses on those policies which were screened in for further assessment in the HRA, and / or addressed during the Examination. Changes to policies concerned with protection of the natural environment, essentially assessed in the HRA as having a positive effect, are also screened. They can be summarised as:

Policies affecting the location and scale of housing and industrial development:

- LP1 (Spatial Development Strategy);
- LP1D (South Woodford Investment and Growth Area);
- LP2 (Delivering Housing Growth); and
- LP14 (Stimulating Business and the Local Economy).

Policies protecting the environment:

- LP22 (Promoting Sustainable Transport);
- LP24 (Pollution);
- LP35 (Protecting and Enhancing Open Spaces); and
- LP39 (Nature Conservation and Biodiversity).

2 Screening of modifications and amendments

2.1 Main modifications

The following table refers to the modifications and amendment numbers as set out in the *Schedule of Main and Additional Modifications to Redbridge Local Plan – October 2017*. The changes are assessed in terms of their possible effect on Epping Forest SAC and determined as neutral, positive or negative.

Table 2.1: Screening of main modifications

Modification Number	Para/ Policy/ Section	Summary of key modification / amendment	Potential effect on Epping Forest SAC
MM11	LP1D	Reduction on housing allocation in South Woodford to 430, with increase in employment allocation.	Positive: reduced recreational pressure
MM19	Para. 3.8.4 & 3.8.5 (LP2)	Reduction in Borough-wide allocation to 17,237 homes	Positive: Reduced recreational and transport-related air quality pressure
MM35	LP14	Addition of Class B8 to be in conformity with the London Plan (2016) (storage and distribution) use to policies for Southend Road Business Park	Neutral: No change in traffic generation
MM46	LP22	Strengthened wording of section (h) relating to requirement for Travel Plans	Positive: Gives greater confidence new developments will minimise traffic generation
MM49	Para. 4.14.3 (LP24)	New aspiration to neutralise impact of major development and cumulative impact of smaller developments on air quality	Positive: Although aimed at human health targets, gives greater confidence that new developments will not result in negative air quality effects on SAC
MM50	LP24	Section (c) strengthened to require mitigation of negative air quality effects, and states permission will be refused if air quality exposure not reduced to acceptable levels	Positive: Although aimed at human health targets, gives greater confidence that new developments will not result in negative air quality effects on SAC
MM62	LP35 / para. 6.2.4	Linked to 2016 Open Space Strategy with defined accessibility standards now set out in para. 6.2.4	Positive: Gives greater confidence greenspace provision will absorb recreational pressure from

Modification Number	Para/ Policy/ Section	Summary of key modification / amendment	Potential effect on Epping Forest SAC
			new developments
MM68	Para. 6.6.2 (LP39)	Clarification and strengthening of requirement to provide SANG or SAMM for new developments	Positive: Gives greater confidence in implementation of mitigation measures to avoid recreational pressures
MM69	Para. 6.6.2 (LP39)	Explicit recognition that development outside 2km buffer may require assessment of air quality effects on SAC	Positive: Greater confidence air quality effects on SAC of new developments will be addressed, irrespective of location

2.3 Additional modifications

A number of policies now include new references to nature conservation and water quality objectives, which will have a positive effect on biodiversity conservation in the Borough. None of these impact directly on Epping Forest SAC, and are therefore neutral with respect to the HRA.

3 Summary of effects

3.1 Development policies

The overall reduction in residential units across the Borough, and within South Woodford in particular, reduce the potential pressures on Epping Forest SAC from increased recreational use and traffic-generated air pollution. They therefore increase the level of confidence in the conclusion of no likely significant effect reached in the HRA.

The explicit addition of B8 uses to Southend Road Business Park may have been considered to increase traffic generation to a greater extent than other uses. However, the Council have confirmed that it was always intended to permit B8 uses, and this was a formal change required to conform to policy within the London Plan (2016).

3.2 Conservation policies

Changes to all policies are positive, strengthening their wording and making it more likely that their implementation will help to avoid significant effects on Epping Forest SAC, through control of traffic generation, air pollution, and ensuring adequate access to open space for residents of new developments.

The more explicit requirements for new developments to provide SANG or SAMM, and recognition of the potential for air quality effects of developments outside the 2km buffer, both increase the confidence in a prediction of no likely significant effect.

4 Conclusions

The net effect of the modifications is positive, reducing potential pressures from residential development, while strengthening policies which protect the environment. The mechanism for assessing and mitigating project-level effects on the SAC has been made more explicit within LP39, in line with the Inspector's questions and discussions during the Examination (as set out in document CED033).

The conclusions of no likely significant effect on Epping Forest SAC made in the HRA therefore remains valid following the modifications and amendments to the Local Plan.