



SUSTAINABILITY APPRAISAL AND STRATEGIC ENVIRONMENTAL ASSESSMENT FOR THE LEE VALLEY REGIONAL PARK DEVELOPMENT FRAMEWORK

Post Adoption Statement

March 2011





Sustainability Appraisal and Strategic Environmental Assessment for the Lee Valley Regional Park Development Framework

Sustainability Appraisal Adoption Statement

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1 Introduction

1.1 Purpose of this Sustainability Appraisal Adoption Statement

This Sustainability Appraisal Adoption Statement has been prepared for Lee Valley Regional Park Authority as part of the sustainability appraisal (SA) of the Lee Valley Regional Park Development Framework (PDF). It represents the final stage of the SA process for the Development Framework.

The SA Adoption Statement has been produced in compliance with the Town and Country Planning (Local Development) (England) Regulations 2004 SI No. 2204 and the Environmental Assessment of Plans and Programmes Regulations 2004 SI No. 1633. The statement incorporates the requirement to produce an Environmental Statement as required by the SEA Directive 2001/42/EC.

This SA Adoption Statement accompanies the adopted Vision, Strategic Aims and Thematic Proposals for the Park Development Framework, which can be accessed at:

http://www.leevalleypark.org.uk/en/content/cms/about_us/park_framework/.

1.2 The Lee Valley Regional Park Development Framework: Background

The Lee Valley Regional Park and the Lee Valley Regional Park Authority were created in 1967 through the Lee Valley Regional Park Act 1966. The Act requires the Park Authority to prepare plans setting out proposals for the future management and development of the Park.

In this context the Lee Valley Regional Park Authority is currently preparing a Park Development Framework (referred to throughout this document as the PDF). This will replace its existing Park Plan, which was adopted in 2000. The PDF will set out the Park Authority's aspirations for future development and management in the Park, through presenting a strategic framework for the Park Authority's activities, and providing guidance for other organisations and individuals involved in the development and management of land within the Park.

As part of this process, the Park Authority has been developing an overall Vision for the Park, comprising Strategic Aims and a set of Thematic Proposals. This is presented in the latest umbrella document for the PDF, which this Adoption Statement accompanies. The Thematic Proposals will subsequently set the framework for a number of area specific plans, or Area Proposals, which will be prepared on an ongoing basis and will set out Park Authority's proposals for the Park on a more detailed locational basis. Area Proposals will gradually replace specific aspects of the existing Park Plan.

The key facts related to the PDF are presented in **Table 1.1**.

Table 1.1: Key facts relating to the Lee Valley Park Development Framework

Name of Responsible Authority	Lee Valley Regional Park Authority.
Title of plan	Lee Valley Park Development Framework.
What prompted the plan (e.g. legislative, regulatory or administrative provision)	The Lee Valley Regional Park and the Lee Valley Regional Park Authority were created in 1967 through the Lee Valley Regional Park Act 1966. The Act requires the Park Authority to prepare a plan setting out proposals for the future management and development of the Park.
Subject	Thematic and spatial plan for the Park's ongoing development.
Period covered by the plan	No fixed period. The Park Development Framework will undergo regular review.
Frequency of updates	As required.
Area covered by plan	The area within Lee Valley Regional Park. Lee Valley Regional Park is comprised of a series of green and open spaces and a network of reservoirs connected by the Lee Navigation and other water courses. It stretches southwards approximately 40km (26 miles) from Ware in Hertfordshire to the River Thames in London, and encompasses almost 4,000 hectares.
Purpose and/or objectives of plan	The PDF will set out the Park Authority's aspirations for future development and management in the Park. It will present a strategic framework for the Park Authority's activities, and provide guidance for other organisations and individuals involved in the development and management of land within the Park.
Plan contact point	Stephen Wilkinson, Head of Planning & Strategic Partnership, Lee Valley Regional Park Authority. Tel: 08456 770 600.

1.3 Content of this SA Adoption Statement

SEA Regulations 16.3c(iii) and 16.4 require that a 'statement' be made available to accompany the plan, as soon as possible after the adoption of the plan or programme.

The SEA Regulations highlight that the statement should contain the following information:

- ▶ The reasons for choosing the preferred strategy for the plan as adopted in the light of other reasonable alternatives dealt with;
- ▶ How environmental considerations have been integrated into the plan;
- ▶ How consultation responses have been taken into account; and
- ▶ Measures that are to be taken to monitor the significant environmental effects of the plan.

The Town and Country Planning Regulations (Local Development) (England) Regulations 2004 36a(ii) similarly require that a SA Statement be produced at Adoption. This serves a very similar purpose to the SEA Adoption Statement. This document, the Sustainability Appraisal Adoption Statement therefore refers to both processes and addresses the requirements of both.

This combined approach is reflected by the Planning Advisory Service Guidance on SA (PAS, 2009), which states that the SA Adoption Statement should incorporate:

- ▶ Sustainability considerations - how these have been integrated into the development plan document;
- ▶ Options and consultation responses - how any received on the development plan document and sustainability appraisal reports (at all stages) have been taken into account;
- ▶ Reasons for of the choice of alternatives in light of other reasonable alternatives considered; and
- ▶ A programme for monitoring sustainability effects - measures to be taken to monitor the significant sustainability effects of implementing the development plan document.

In this context, the purpose of the SA Adoption Statement is to outline how the SA process has influenced and informed the PDF's development process and demonstrate how consultation on the SA has been taken into account.

Chapter 2 of this SA Adoption Statement summarises how the SA has informed and influenced the PDF, in light of the other alternatives dealt with. **Chapter 3** highlights how sustainability considerations (including environmental considerations) have been integrated into the PDF and the residual sustainability effects of the plan which are likely to arise. **Chapter 4** discusses how consultation has been carried out and taken into account during the SA. The final chapter, **Chapter 5** sets out the proposed monitoring regime for the SA, which it is proposed will be carried out alongside monitoring for the PDF.

1.4 Habitats Regulations Assessment

Lee Valley Regional Park contains the Lee Valley Special Protection Area and Ramsar site, is adjacent to Epping Forest Special Area of Conservation (SAC), and lies close to Wormley-Hoddesdonpark Woods SAC. These are sites of international nature conservation importance and, in accordance with European and national legislation, and Government policy, benefit from a high level of protection from the negative impacts of spatial planning. The Conservation of Habitats and Species Regulations 2010 ('the Habits Regulations') stipulate that any plan or project likely to lead to significant effects on the qualifying features of such sites must be subject to an appropriate assessment to determine the nature of any adverse effects on ecological integrity. The Park Development Framework has undergone a screening procedure in accordance with the Habitats Regulations, the results of which confirm that the PDF is not likely to lead to any significant effects at these sites, either alone or in combination with other plans or projects.

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2 How the sustainability appraisal process has informed and influenced the Park Development Framework

2.1 The SA process and the Park Development Framework

The main aim of SA is to inform and influence the plan making process to maximise a plan’s sustainability value. In this context the SA process has fed into the PDF through providing information at each stage of its development process.

Table 2.1 highlights the main outputs of the SA process in conjunction with those of the PDF. A more detailed description of how the respective stages of the PDF and SA have interlinked is presented in **Sections 2.2 to 2.6**.

Table 2.1: Stages of the development of the PDF and accompanying SA process

Stage of the PDF’s development process	Stage of the SA process
Initial information and data gathering for the PDF (2006-2007) 	Sustainability Appraisal Scoping Report (June 2007) 
Development of Schematic Scenarios for the PDF (late 2007) 	Interim Sustainability Appraisal Report: Schematic Scenarios (December 2007) 
Development of Statements of Intent (early to mid 2008) 	Sustainability Appraisal Technical Note: Assessment of Statements of Intent (August 2008) 
Draft PDF: Preferred Scenario (November 2009) 	Sustainability Appraisal Report (November 2009) 
Final PDF (January 2011)	SA Adoption Statement (January 2011)

2.2 Scoping

The Scoping Report for the PDF was published for consultation for a period of six weeks between June and July 2007. Its purpose was to establish the scope of and methodology for the SA, to provide the basis for consultation related to the range and level of detail of reporting for the SA, and the evidence base on which it is established. Responses were received from eight organisations (**Section 4.2**). Following the receipt of responses, the SA information, including the SA's evidence base, policy and plan review, and SA Framework of objectives and indicators against which the PDF would be assessed was updated and the information was included in subsequent SA Reports.

Scoping for the SA process complemented initial evidence gathering for the PDF.

2.3 Development of Schematic Scenarios

In late 2007 the Park Authority prepared a set of four Schematic Scenarios. The first main output of the PDF's development process, these alternative scenarios sought to explore a range of possible futures for the Park, and evaluate the range of benefits and potential implications that could arise from their implementation. The four Scenarios were:

1. Biodiversity;
2. Sport and physical activity;
3. Environmental infrastructure; and
4. Social and community infrastructure.

Each Scenario included (i) aspirations, (ii) guiding principles, and (iii) more specific proposals.

To accompany the Schematic Scenarios, and to inform this stage of the PDF's development, an Interim SA was prepared. The Interim SA Report presented an appraisal of the four scenarios, and set out a number of sustainability considerations which it was advised should be considered through subsequent stages of the PDF's development¹.

The aim of this initial exploration of scenarios was to contribute to the development of a preferred scenario for the PDF, which would draw on elements of each of the initial scenarios, and seek to combine elements from each that offer the greatest synergy and the least degree of compromise. In this context the results of this assessment were used to help highlight the potential sustainability strengths and weaknesses of the four alternative Scenarios for the Park at an early stage of development, and to provide an opportunity to discuss potential sustainability issues. This process helped ensure that the sustainability performance of the emergent PDF and its objectives could be maximised, and that the more sustainable aspects of the proposed Scenarios would form the basis for the emerging PDF Thematic Proposals.

The SA assessment carried out on the Schematic Scenarios subsequently informed the development 'Statements of Intent' by the Park Authority.

¹ The Interim SA Report can be accessed at the web link presented in **Section 2.7**.

2.4 Assessment of Statements of Intent

Following the receipt of representations on the proposed Schematic Scenarios, including input from stakeholders at various stages, early drafts of the PDF were developed. These early drafts were presented as 'Statements of Intent', designed to focus the development of the PDF.

The Statements of Intent were assessed by the SA team in August 2008. For each theme four scenarios were considered, each looking at a progressively more interventional option: (i) decrease, (ii) status quo, (iii) cumulative increase and (iv) step change.

The themes addressed in the 'Statements of Intent' were:

- ▶ Arts;
- ▶ Play;
- ▶ Volunteers;
- ▶ Access to the Park;
- ▶ People and nature;
- ▶ Facilities;
- ▶ Contaminated land;
- ▶ Food production;
- ▶ Biomass production;
- ▶ Events;
- ▶ Access to nature;
- ▶ Accommodation;
- ▶ Route network;
- ▶ Heritage;
- ▶ Energy generation; and
- ▶ Sports development.

The appraisal of the Statements of Intent were presented in a Technical Note in August 2008 and fed back to the PDF development team.

The assessment of the Schematic Scenarios and the Statements of Intent therefore comprised an appraisal of a series of 'reasonable alternatives' for the PDF (**Section 1.3**). The consideration of these alternative options subsequently informed and influenced the development of a preferred approach for the PDF.

2.5 Draft version of the PDF and SA Report

The next stage of the development process for the PDF was the development of a draft consultation document for the PDF. The draft PDF, which was released for consultation on 23rd November 2009, presented a series of theme based aims, objectives and proposals for the Park. In this context the document set out a series of 'Thematic Proposals' for the future management and development of the Park. The development of the draft PDF document was informed by consultation with stakeholders at the Schematic Scenarios and Statements of Intent stages, further technical studies, consideration of local initiatives and, as described above, the SA process.

To accompany consultation on the draft PDF, an SA Report was prepared. This set out the stages of the SA process that had been carried out to date, and presented an appraisal of preliminary Thematic Proposals. It also summarised the appraisal findings linked to earlier

stages of the SA process. The SA Report was therefore designed to support consultation on the draft PDF and to provide sustainability context.

2.6 Adoption of the PDF

Following the conclusion of consultation on the draft PDF and accompanying SA Report in early 2010, the PDF was updated to take into account responses received, and on further input from stakeholders. These changes to the PDF were then considered by the SA team and a small number of minor updates to the PDF were suggested. Due to the limited scope of the updates and additions made to the PDF at this stage, it was considered that no major revisions were required to bring the SA Report up to date (**Section 2.5**).

The Park Authority is presently preparing to adopt the Thematic Proposals for the PDF early in 2011. This will be followed by the preparation of location-specific Area Proposals for the PDF.

2.7 Where documents linked to the PDF and accompanying SA process can be found

All documents and background information associated with the PDF, including those linked to the SA process, can be accessed on the Lee Valley Regional Park Authority website at:

<http://www.leevalleypark.org.uk/parkframework/archive/>.

3 How sustainability considerations have been taken into account

3.1 How sustainability considerations have been taken into account by the PDF

As discussed in **Chapter 2**, the SA process has informed and influenced the PDF throughout its development process. The SA process has therefore highlighted at different stages the sustainability issues which have the potential to arise as a result of the implementation of earlier and later versions of the PDF's Thematic Proposals.

The Final PDF has addressed many of these potential sustainability issues through taking into account of the findings of the SA process. In this context most minor impacts relating to specific objectives or groups of proposals have been addressed by other components of the PDF. Where this has taken place, this has been noted in the analysis undertaken during the SA.

Besides the various SA Reports that were prepared as part of the SA process, the SA team attended regular PDF project meetings and stakeholder workshops. This served to keep abreast of proposals and provide direct input to the PDF's development process.

3.2 Residual sustainability effects of the Final PDF

Whilst most sustainability issues have been addressed through the Thematic Proposals in the Final PDF, a number of residual sustainability effects are likely to remain through taking forward the PDF. **Table 3.1** below highlights these potential sustainability effects, and discusses how these effects may be offset through the ongoing implementation of the PDF, including through the forthcoming development of the Area Proposals. Development of Area Proposals will be the next key stage of the PDF, translating the thematic proposals onto area based maps in line with Section 14 of the Lee Valley Park Act 1966. They will provide specific proposals covering the whole Park.

It will be important to monitor these potential effects in order to ensure adverse effects are minimised and that the desired intentions of the Thematic Proposals included in the Final PDF are delivering results, particularly through the area proposals as these come forward. **Chapter 5** outlines how these potential residual effects will be monitored.

Table 3.1: Residual sustainability effects highlighted through the SA process and how they can be addressed through the implementation of the PDF and Area Proposals

Residual sustainability effects of the PDF	How these can be addressed through the implementation of the PDF and Area Proposals
<p>Potential increase in traffic flows stimulated by a growth in visitor numbers.</p>	<p>The Thematic Proposals have a strong focus on sustainable transport improvements. As well as supporting rail and bus access improvements in the Park, the Thematic Proposals promote the growth and improvement of walking and cycling networks in and around the Park. This will be supported by the Thematic Proposals' close focus on enhancements to the public realm and improvements to safety and security.</p> <p>It will however be important to monitor these potential effects in order to ensure adverse effects are minimised, and that the desired intentions of improved and expanded public transport and walking and cycling initiatives are delivering results. Green Travel plans are in place for a number of facilities within the Park and these will be sought and developed as part of new development.</p>
<p>The Thematic Proposals seek to promote the use of the park for a wide range of events. There is the potential for these events to have impacts on local biodiversity, landscape or recreational assets.</p>	<p>The Area Proposals for the PDF should seek to ensure the avoidance or mitigation of potential effects through promoting the introduction and implementation of appropriate event management regimes at the locations in the Park identified as potential event venues. This will help limit possible effects on local assets resulting from events taking place in the Park.</p>
<p>Pressures on biodiversity assets from increased visitor access and new areas undergoing development.</p>	<p>Biodiversity benefits from a high priority in the PDF. The Thematic Proposals seek to protect and enhance biodiversity in the Lee Valley, and there is also recognition of the need to provide robust ecological connectivity of biodiversity sites across the Park through an improvement of green infrastructure and other means.</p> <p>It will nevertheless be important to monitor effects on biodiversity to ensure that potential effects have been minimised and opportunities for enhancement have been realised. Full habitat surveys should take place in areas of biodiversity value likely to be affected by redevelopment.</p> <p>A visitor access management plan should also be developed to ensure that possible tensions between increasing visitor access and conservation management are adequately addressed; this could include a zoned management approach whereby certain types of visitor access or facilities are targeted towards the least ecologically sensitive areas. The Authority's 'Access to Nature' thematic and area based proposals will also address these issues by ensuring increased access for visitors does not impact on the biodiversity values of the Park.</p>

Residual sustainability effects of the PDF	How these can be addressed through the implementation of the PDF and Area Proposals
<p>Potential increases in greenhouse gas emissions from a growth in visitor numbers and changes in land use and function.</p>	<p>The Thematic Proposals have a strong focus on renewable energy production and other measures which are likely to support climate change mitigation (such as through the encouragement of the use of sustainable modes of transport).</p> <p>It will however be important to ensure that the Park continues to support national targets in relation to climate change mitigation, including linked to the Climate Change Act, which sets a legally binding target of at least a 34 percent cut in greenhouse gas emissions by 2020 and at least an 80 percent cut by 2050 against a 1990 baseline.</p> <p>In this context the Park's Carbon Footprint should be calculated and undergo regular monitoring to assist planning for the provision of energy efficiency in Park operations, the production of energy within the Park and the reduction of overall emissions in the Park from other sources such as transport.</p> <p>Measuring carbon emissions and the need to reduce CO₂ emissions from Authority operations is a key performance indicator for the Authority. Its carbon footprint is measured in terms of utility consumption, vehicle fleet and employee travel. This is reported to the Management Team quarterly and to Members on a six monthly basis. Utility consumption at a site level is reported to Members through the Scrutiny Committee. This is however only part of the picture given there are a number of other stakeholders who operate and provide services within the Park.</p> <p>During 2010 the Authority reduced its carbon footprint by 6% across the whole Regional Park. Some initiatives included:</p> <ul style="list-style-type: none"> • Lee Valley Ice Centre - revised management of chiller units, replacement of lights with LED lamps and improved efficiency of heating systems. • Myddelton House - regular communications to raise staff awareness of ways of saving energy e.g. switching off lights and PCs. • Myddelton House Gardens - ground source heat pump fitted in the new visitor centre. • Replacement of vehicles for a newer, greener fleet. <p>The Authority will continue to monitor its carbon footprint but the monitoring and review process may change due to circumstances over time.</p>

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4 How consultation on the SA has been taken into account

4.1 Consultation on the SA

The SEA Directive requires responses to consultation to be taken into account during the preparation of the plan or programme and before its adoption or submission to a legislative procedure.

Consultation has been an integral part of the SA of the PDF. In addition to enabling the opinions of the statutory environmental bodies and other stakeholders to be taken into account, it has provided an opportunity for the public to be informed as to how decisions are made.

4.2 Consultation on the Scoping Report

The SA Scoping Report for the PDF was published for consultation for a period of six weeks in June and July 2007 with the three statutory SEA/SA consultation bodies: English Heritage, the Environment Agency and Natural England. It was also released to a range of other stakeholders. Its purpose was to establish the scope of and methodology for the SA, to provide the basis for consultation related to the range and level of detail of the Sustainability Appraisal Report, and the evidence base on which it is established. Responses were received from eight organisations. Following the receipt of responses, the SA information, including the baseline and policy and plan review, was updated. This information was included in subsequent SA Reports.

Consultation responses on the Scoping Report were received from:

- ▶ British Waterways;
- ▶ Environment Agency;
- ▶ Epping Forest District Council;
- ▶ Greater London Authority;
- ▶ Green Arc;
- ▶ Groundwork;
- ▶ Natural England; and
- ▶ Sustrans.

A detailed analysis of the consultation responses, and how the comments have been taken into account is included in **Appendix A**.

4.3 Consultation during subsequent stages of the SA

As described in **Chapter 2**, following consultation on the Scoping Report the SA process informed and influenced the development of the draft PDF by the consideration of a series of Schematic Scenarios and Statements of Intent (**Sections 2.3 and 2.4**). To help provide a sustainability context to this process, members of the SA team attended a series of stakeholder workshops which were designed to gain an input from a range of organisations and individuals with an interest in the future of the Park. Whilst these stages of the SA process were not subject to formal consultation, they provided an ongoing and iterative contribution to the development of the PDF through drawing on stakeholder input.

The next stage of the PDF's development process was the progression of the Preferred Scenario for the PDF. This led to the release of the draft PDF and accompanying SA Report for consultation on 23rd November 2009 (**Section 2.5**). Consultation responses received on the draft PDF and accompanying SA Report were taken into account and addressed through the subsequent development of the Final PDF.

The SA process has therefore provided stakeholders with a number of opportunities to comment on and contribute to the SA process carried out alongside the PDF.

5 Monitoring

5.1 Monitoring

The SEA Directive states that 'member states shall monitor the significant environmental effects of the implementation of plans and programmes.....in order, inter alia, to identify at an early stage unforeseen adverse effects, and to be able to undertake appropriate remedial action' (Article 10.1). In addition, the Environmental Report (or SA Report) should provide information on a 'description of the measures envisaged concerning monitoring' (Annex I (i)).

The monitoring requirements typically associated with the SA process are recognised as placing heavy demands on authorities with SA responsibilities. For this reason, the proposed monitoring framework should focus on those aspects of the environment that are likely to be negatively impacted upon, where the impact is uncertain or where particular opportunities for improvement might arise.

Table 5.1 outlines proposals for a monitoring programme for measuring the PDF's implementation in relation to issues where the SA has identified potential for residual effects (**Section 3.2**). It also seeks to monitor where uncertainties relating to the appraisal findings arose and suggests where monitoring is required to help ensure that the benefits of the PDF are achieved through the forward planning process for the Park.

Monitoring is particularly useful in answering the following questions:

- ▶ Were the assessment's predictions of sustainability effects accurate?
- ▶ Is the PDF contributing to the achievement of desired sustainability objectives?
- ▶ Are mitigation measures performing as well as expected?
- ▶ Are there any unforeseen adverse effects? Are these within acceptable limits, or is remedial action required?

The purpose of monitoring is to measure the sustainability effects of a plan, as well as to measure success against the plan's objectives. It is therefore beneficial if the monitoring strategy builds on monitoring systems which are already in place for the PDF. To this end, a number of the indicators of progress chosen for the SA monitoring require data that is already being routinely collected by the Park Authority and its partner organisations. It should also be noted that monitoring can provide useful information for future plans and programmes.

Table 5.1: Proposed monitoring programme for the PDF

Potential negative effect, or area to be monitored	Indicator	Data Source	Frequency of monitoring and scale	Target/ Trigger
Potential effects on biodiversity from a growth in visitor numbers and increased visitor access.	Area (ha) of Park administered by the Park Authority incorporating biodiversity considerations into management regimes	Lee Valley Regional Park Authority	Annually, Park wide	When area reduces year on year
Expansion of high quality Park-wide wildlife corridors forming part of the wider regional biodiversity network	Length of wildlife corridors in positive management for biodiversity benefit	Lee Valley Regional Park Authority	Annually, Park wide	When length reduces year on year
Increases in greenhouse gas emissions from a growth in visitor numbers.	Carbon footprint of Park	Lee Valley Regional Park Authority	Annually, Park wide	When sector emissions increase year on year
Potential increases in traffic flows from a growth in visitor numbers	Proportion of people travelling to the Park by public transport or walking and cycling	Lee Valley Regional Park Authority	Annually, Park wide	When percentage reduces year on year

5.2 Links with monitoring for the PDF

The SA guidance suggests that SA monitoring and reporting activities can be integrated into the regular planning cycle.

The Park Authority proposes to review the different component parts of the PDF across separate timeframes. The 'Vision, Aims and Principles' document will be reviewed every five years, the 'Thematic Proposals' will be reviewed annually in line with the Authority's Business Plan, budget process and performance rounds. Incorporating the proposed SA monitoring programme into this process will help to consolidate the sustainability gains pursued by the PDF.

The monitoring programme may evolve over time based on the identification of additional data sources (as in some cases information will be provided by outside bodies) and the collection of new information by the Park Authority.

References

Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment

The Environmental Assessment of Plans and Programmes Regulations 2004, Statutory Instruments 2004 No. 1633

Town and Country Planning (Local Development) (England) Regulations 2004, Statutory Instruments 2004 No. 2204

Department for Communities and Local Government (September 2009): *CLG Plan Making Manual: Sustainability Appraisal*

UE Associates (2009): *Habitats Regulations Assessment for the Lee Valley Park Development Framework: Screening Statement.*

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Appendix A: Consultation Responses on the SA Scoping Report

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Analysis of Consultation Responses

Lee Valley Regional Park Development Framework SA/SEA/HRA

Organisation	Date	Para	Comments	Document	Page ref	Summary of reaction, if any needed
Environment Agency	07/07/2007	4	More emphasis should be made on waste management and reduction, both in terms of current and future practices as well as how the consequences of past landfilling activity is to be addressed (because of its potential impacts on a number of receptors especially as a result of development activity).	Scoping Report	pp 36- 37, Section 3.5.2 - 3.5.3	Update issues section (s.3.5.3); find appropriate (low risk) land use if site cannot be remediated
		17	The Climate Change objective should be split in two, looking at adaptation and mitigation separately - flood risk could then be brought in under each of these as questions.		pp63, Table 4.1	Agreed; objectives amended.
		16	More specific targets should be set to measure the objectives - for example on renewable energy, promoting sustainable homes and zero carbon buildings - which we can help the Authority with.		pp59, Section 4.1	Offer welcomed.
		3	The following PPPs should be reviewed and referenced: Natural Environment and Rural Communities Act 2005; East of England Regional Strategy (RSS14); Lower Lea Valley Planning Framework; East London Green Grid Framework Draft Supplementary Planning Guidance to the London Plan; Sustainable design and construction Supplementary Planning Guidance to the London Plan; London Tree and Woodland Framework (= London's regional forestry strategy); London Biodiversity Action Plan; Environment Agency North London river restoration strategy; East of England biodiversity strategy; Water Matters. The Mayor's Draft Water Strategy 2007; London Catchment Abstraction Management Strategy (CAMS); River Lee Fisheries Action Plan; Upper Lee CAMS Environment Agency 2006; Lower Lee CAMS Environment Agency 2006; Lower Lee Flood Risk Management Strategy; Lower Lee strategic flood risk assessment; Mayors Strategy for Municipal Waste and Business Waste; PPS25; Thames Catchment Flood Management Plan.		pp75-76, Section 6 and pp 22. Section 3.1	Check and update PPP
		4	Further sources should be used for the collection of baseline information, for example the Water Framework Directive, PPS25, the National Land Use database, the British Geological Survey and the Thames Catchment Flood Management Plan, whilst the EA has relevant information on historic landfill activity, contaminated land, soil and groundwater vulnerability etc.		pp 22, Section 3.1.2	Information on landfill not forthcoming at the time of writing. Question the value of WFD and PPS25 in baseline (though certainly relevant to PPP). BGS already consulted? Thames CFMP to be included (possible under PPP) Check and amend
		4	Further detail is required on groundwater, flood risk and hydro-geology.		pp 50, Section 3.12	Check baseline and possibly update.
		6, 7, 8, 11, 12	Changes need to be made to some of the wording and indicators in Section 3.5.3, Section 3.8, Section 3.12, Section 3.12.3 and Section 3.13.3 to improve clarity.		Section 3.5.3, Section 3.8, Section 3.12, Section 3.12.3 and Section 3.13.3	Check and update
		15	Question b) in Objective 2 should also include access to natural greenspace.		pp 60, Section 4.2	Agreed; objectives amended.
		16	Objective 4 should be changed to include issues of biodiversity and fragmentation.		pp 61, Section 4.2	Biodiversity and fragmentation are addressed under Objective 11; objective unchanged.
		17-19	Objective 11, including questions b) and e) need to be reworded to use the word 'priority' when referring to some species and habitats, whilst the impact of development/recreation on biodiversity has not been fully considered.		pp 62, Section 4.2	Objective 11 (including questions) amended. Impacts are considered during assessment.
		20-21	Objective 15 and 16 also need rewording.		pp 63, Section 4.2	Objective 17 (where objective 15 has been moved to) has been updated, including question e). Objective 15 (where objective 16 has moved to) has also been amended.
Epping Forest District Council	Jul-07	1b	Problems regarding PPPs: inconsistencies between the inclusion of PPPs from some boroughs/ districts and not from others; our Community Strategy and LP Alterations in particular are only partially included in the discussion on socio-economics; no mention is made of the Annual Monitoring Reports for demographics; no information from the GLA or Primary Care Trusts has been used for well-being; there is no mention of either Essex or Herts County Councils' Minerals & Waste Plans or Local Transport Plans; and the EEP and London Plan have not been consulted regarding landscape, biodiversity, heritage, water or climate factors.	Scoping Report	pp 26 Section 3.2, pp 30 Section 3.3, pp 34 Section 3.4, pp 35 Section 3.5, pp 38 Section 3.6, pp39-56 Section 3.7-3.13	Check and update - I can't locate EFDC's Community Strategy
		2a 1, 2a 2, 2b	Regarding baseline information: recreation/leisure should be separated from health and given more emphasis; the treatment of heritage should go beyond the traditional emphasis on listed buildings etc, instead focusing on the history of land use (especially its relationship to food production and current issues of organic production, agriculture and horticulture and food miles); and the Lea Valley Growers Association should be used to trace the history of the glasshouse industry.		pp 23, Figure 3.1, pp 45 Section 3.9	RE: recreation and leisure; direction taken from LVRPA and no amendments considered necessary. Expand heritage section to include landscape and living heritage approach.
		3a	The list of objectives is too idealistic and unachievable regarding socio-economics, whilst there are other minor issues regarding demographics (ignores influx of young adults into London), transport (vagueness of 'non-motorised transport'), landscape (conflicting activities of other land users has been ignored), biodiversity (ancient woodland is over-emphasised), heritage (the history of land use is lacking), water (recreation is not included), and climate (unclear).		pp 60, Table 4.1	Objective 7 amended slightly; other objectives considered fit for purpose by other consultees and LVRPA.
		4	Chapter 2 (Approach to SA) is very confusing and hard to follow		pp 13 Section 2	None.

Greater London Authority	Jul-07	5	The Mayor's London Plan and other strategies (such as that for Air Quality and Biodiversity) are listed as sources for baseline information, but should also be included in the PPP Review (and the HRA).	Scoping Report	pp24 Section 3.1.2	Check and amend
		6	The PPP should also include: the London Plan Sub-Regional Development Framework (2006); the Lower Lea Valley Planning Framework (Jan 2007); the Draft East London Green Grid Framework, London Plan Supplementary Planning Guidance (Nov 2006); the Draft Providing for Children and Young People's Play and Informal Recreation, London Plan Supplementary Planning Guidance (Oct 2006); the Draft Improving Londoners' Access to Nature, London Plan Implementation Report (Mar 2007); and the London Tree and Woodland Framework (Mar 2005).		pp24 Section 3.1.2	Check and amend
		7	How the Park's catchment population of 9 million (paragraph 3.2.3) was derived is unclear - a benchmark of 8 km is recommended as a means of determining the population served.		pp 29 Section 3.2.3	Based on regional catchment, ie ONS population figures for Districts, Boroughs, Herts and Essex (I think) Use both catchments from now on
		8	The SA and PDF should also recognise the impact on population catchment and material assets of those opportunities presented by the Olympic Legacy Park and new park land proposed within the Lower Lea Valley Planning Framework for extending the Park south to the Thames.		pp 29 Section 3.2.3	Check and amend
		9	The multi-functional nature of green infrastructure needs to be acknowledged and its contribution to mitigating and adapting to climate change considered in more depth.		pp 54-56, Section 3.13	Expand or refine issues (s.3.5.3, 3.8.3, 3.13.3)
		10	There appears to be a degree of duplication in the Material Assets, Landscape and Biodiversity sections that could create confusion.		pp35- 45, Section 3.5-3.8	Amended.
		11	The SA and PDF should not support the use of disused mineral extraction sites and quarries for landfill as it conflicts with the aims European Union Landfill Directive.		pp37 Section 3.5.3 and pp51 3.12.3	Agreed; neither SA or PDF have supported this.
		12	Section 3.7.3 refers to "a possible lack of open space", but does recognise that the deficiencies in the provision of public open space and in access to nature have been identified elsewhere.		pp 40, Section 3.7.3	Check and amend for issues going forward
		13	The SA should consider how the Regional Park can contribute to meeting targets (from Alterations to London Plan) for the re-creation and restoration of priority habitats.		pp 42, Section 3.8	Check and amend
		14	Trees and woodland should be given more consideration.		pp42 Section 3.8 and in general	Check and amend - esp landscape and biodiv
		15	SA Objectives 4 and 11 should refer to improving the provision of open spaces and biodiversity to reduce the identified deficiencies.		pp60 Table 4.1	Despite recent policy developments it is considered essential that access to nature/biodiversity is <i>managed</i> rather than improved, particularly with regards to the SPA designation and wild birds susceptible to recreational disturbance. That access to open space should be improved especially in areas of deficiency is agreed.
		16	The phrasing of question 11(d) is ambiguous and could be interpreted to mean that it is acceptable to destroy existing habitat where new habitat was created.		pp62, Table 4.1	Amended.
		17	List of documents given above should also be taken into account for HRA in combination assessment.		pp 68 Section 5.3.2	Amended.
Natural England	13/07/2007	2	The PPP Review Index's biodiversity, flora and fauna category should reference the London Plan Policy 3D.12 'Biodiversity and Nature Conservation', the Mayor's Biodiversity Strategy, the London BAP, and Section 40 of the Natural Environment and Rural Communities Act 2006's 'Duty to conserve biodiversity'.	Scoping Report	pp 42, Section 3.8.1,	Check and amend
		4	The baseline data and indicators for the Material Assets topic should reference and give consideration to the GLA's Areas of Deficiency and Natural England's Accessible Natural Greenspace Standards.		pp 35 Section 3.5	Check and amend
		5	A sustainability objective that should be included in the PDF in regard to material assets is to facilitate and enhance access to natural greenspace, with the measurement of decrease in areas of deficiency or the provision of greenspace in accordance with NE's ANGSi standards being excellent ways in which to test and monitor this objective.		pp 35 Section 3.5	It is agreed that this might make an appropriate PDF proposal, but should not necessarily be used as an appraisal objective due to potential tensions between nature conservation and recreation. Open space deficiency has been given more prominence in objective 4.
		6	With reference to the indicator for 'Q11a Biodiversity' this should be the 'net change in extent of natural/semi-natural habitats within LVRP' as well as 'Q11d' ie, '% change in extent of BAP habitats within LVRP'.		pp 62 Table 4.1	Questions revised accordingly.
Green Arc		1	The two main Green Arc documents - The Green Arc approach 2004 and the Green Arc Biodiversity Audit 2005 - have been missed on the PPP review.	Scoping Report	pp 24 Section 3.1.2	Check and amend
		3	Within the SA the Green Arc only appears to be mentioned in the section on Material Assets - it should also be included in sections 3.6 (Transport and Accessibility), 3.7 (Landscape) and possibly 3.4 (Well-Being).		Section 3.6, 3.7, 3.4 and in general	Check and amend
		3	The SA and PDF should consider the opportunities arising from the ongoing partnership working on the Green Arc 'priority opportunity areas' which link into the park's catchment area.		Sections 3.5.3, 3.6.3, 3.7.3, 3.4.3	Add to issues (s.3.5.3, 3.6.3, 3.7.3, 3.4.3)
		4	The Green Arc Strategic Delivery Plan 2007-2012 (which the Authority has already signed up to) represents a good opportunity to identify future projects.		N/A	Agreed

Sustrans		4	The document was difficult to follow.	Scoping Report	Whole SR	None.
		1	We are keen to be involved in developing the detail of objectives, in particular Objective 7.		pp 60, Table 4.1	Offer welcomed.
		4	Detail on the development of National Cycle Route 1 down the Lee Valley as a leisure resource and infrastructure for utility journeys would be appreciated.		pp 38 Section 3.6	Check and amend
Groundwork	Jun-07	2	We are keen to support the Park Authority in its review of the Plan and future framework planning, but at this time have no other comments.	Scoping Report	n/a	None.
British Waterways	Jul-07	1	Regarding review of PPPs, the SA should demonstrate that the Blue Ribbon Network policies in the London Plan and the Early Alterations and Draft Further Alterations have been taken into account.	Scoping Report	Section 3.1.1	Check and amend
		2	Regarding baseline information, the SA should take into account the Mayor's draft London Freight Plan, and should consider the role of the River Lee Navigation for water transport (freight, leisure and passenger) as it was built as a transport corridor.		pp 38 Section 3.6	Direction taken from LVRPA. Freight Plan could be included in PPP
		3	The following are suggested as additional ways to measure objectives: area and/or volumes of water quality improved; hectares of land remediated per annum; lengths of undergrounding of powerlines; number of buildings removed from the Buildings at Risk register per annum; weight of biomass produced in the Park and transported by sustainable non-road means, e.g. water; number of wind turbines; number of micro hydro-electric schemes; number of eco dwellings built in the Park per annum; number of carbon neutral developments in the Park.		pp60, Table 4.1	Consider including in monitoring framework
		4	The Park should have a major role to play in the delivery of the Government and Mayor's agenda for sustainable and mixed communities. The Park Authority has an opportunity to take a leading role in delivering rural and urban regeneration, e.g. eco-friendly homes, 21st Century green industries, recycling facilities, etc. This could be achieved through the release of brownfield land and poor quality Green Belt		Whole SR	Acknowledged -add to issues (s.3.5.3 and others?)

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