

# Lee Valley Regional Park Authority

## Strategic Environmental Assessment Report for the Park Development Framework

### Strategic Policies

April 2019

# **Lee Valley Regional Park Authority Strategic Environmental Assessment Report for the the Park Development Framework Strategic Policies**

**Prepared by LUC**

Planning & EIA  
Design  
Landscape Planning  
Landscape Management  
Ecology  
GIS & Visualisation

LUC LONDON  
43 Chalton Street  
London  
NW1 1JD  
T +44 (0)20 7383 5784  
[london@landuse.co.uk](mailto:london@landuse.co.uk)

Offices also in:  
Bristol  
Edinburgh  
Glasgow  
Lancaster  
Manchester



FS 566056 EMS 566057

Land Use Consultants Ltd  
Registered in England  
Registered number: 2549296  
Registered Office:  
43 Chalton Street  
London NW1 1JD  
LUC uses 100% recycled paper

# Contents

<b>1</b>	<b>Introduction</b>	<b>3</b>
	Strategic Environmental Assessment	3
	Habitats Regulations Assessment	8
	Status of the Park and the Park Authority	8
	Structure of this document	9
<b>2</b>	<b>Environmental Context</b>	<b>10</b>
	Relevant Planning and Policy Context	10
	Baseline Information	15
	Challenges and Opportunities in the Lee Valley and Likely Evolution without the Plan	19
<b>3</b>	<b>SEA Framework</b>	<b>23</b>
	Use of the SEA Framework	25
<b>4</b>	<b>SEA of Strategic Policies</b>	<b>26</b>
	Cumulative effects	36
	Mitigation and Enhancement	39
	Monitoring	39
<b>5</b>	<b>Conclusion</b>	<b>42</b>
<b>Appendix 1</b>		<b>43</b>
	Review of Relevant Plans, Policies and Programmes	43

## Tables

Table 1.1: Meeting the Requirements of the SEA Regulations	5
Table 2.1: Challenges and Opportunities in the Lee Valley and their Likely Evolution without the Strategic Policies	20
Table 3.1: SEA Framework	23
Table 3.2: Key to SEA scores	25
Table 4.1: Summary of effects generated by Strategic Policies E1-E2	26
Table 4.2: Summary of effects generated by Strategic Policies L1-L4	27
Table 4.3: Summary of effects generated by Strategic Policies H1-H3	28
Table 4.4: Summary of effects generated by Strategic Policies B1-B4	29
Table 4.5: Summary of effects generated by Strategic Policies W1-W3	30
Table 4.6: Summary of effects generated by Strategic Policies V1-V4	31
Table 4.7: Summary of effects generated by Strategic Policies D1-D4	33
Table 4.8: Summary of effects generated by Strategic Policies A1-A6	34
Table 4.9: Summary of effects generated by Strategic Policies FR1-FR3	35
Table 4.10: Overview of Strategic Policies effects	38
Table 4.11: Proposed monitoring framework for the Strategic Policies	39

# 1 Introduction

- 1.1 In accordance with the Lee Valley Regional Park Act 1996, it is a statutory duty of the Lee Valley Regional Park Authority (LVRPA) to prepare proposals for the future management and development of the Regional Park.
- 1.2 The new Strategic Policies document, which forms part of the Park Development Framework (PDF), fulfils that duty and replaces the policies in Part 1 of the Park Plan (2000). It also provides an up to date context for the review of LVRPA's Objectives and Proposals, including Area Proposals, and will influence future master planning and project development for sites within and adjoining the Park. The Strategic Policies and Area Proposals will form part of the planning context which will help both the LVRPA and the riparian authorities to positively plan and guide appropriate development in and around the Park.
- 1.3 The Strategic Policies have been subject to Strategic Environmental Assessment (SEA). SEA is the statutory assessment process required under the Environmental Assessment of Plans and Programmes Regulations 2004 (the 'SEA Regulations', Statutory Instrument 2004, No 1633) which provide the legislative mechanism for transposing European Union 'SEA Directive' 2001/42/EC. SEA is an environmental assessment of plans, including plans prepared at a local level to set a framework for future development consents, such as Local Planning Authorities' Local Plans.
- 1.4 There is no statutory requirement for the LVRPA to undertake such an assessment. However, the LVRPA has committed to demonstrate good practice to give weight to the final set of Strategic Policies.
- 1.5 This SEA Report (or Environmental Report) has been prepared by LUC on behalf of the Lee Valley Regional Park Authority (LVRPA) to set out the background to, and the results of, the SEA.

## Strategic Environmental Assessment

- 1.6 The SEA process comprises a number of stages:
  - **Stage A:** Setting the context and objectives, establishing the baseline and deciding on the scope.
  - **Stage B:** Developing and refining options and assessing effects.
  - **Stage C:** Preparing an Environmental Report.
  - **Stage D:** Consulting on the Strategic Policies and the SEA report.
  - **Stage E:** Monitoring the significant effects of implementing the Strategic Policies. Chapter 4 contains a proposed monitoring framework for the Strategic Policies.

### Stage A: Scoping

- 1.7 A SEA Scoping Report, including the PDF's policy context, key environmental issues and a framework for the SEA, was prepared and published for consultation in October and November 2017.
- 1.8 The scoping stage includes compiling and understanding the environmental baseline for the plan area as well as the policy context and key environmental issues. The following tasks and outputs have been updated as part of this SEA Report. The baseline information summarised below and set out in more detail in the Strategic Planning Evidence Base document was collected on the following 'SEA Directive topics' biodiversity, flora and fauna; population and human health; water; soil; air; climatic factors; material assets; cultural heritage and the landscape, as well as relevant social and economic issues. This baseline information provides the basis for predicting and

- monitoring the likely effects of the Strategic Policies and helps to identify alternative ways of dealing with any adverse effects identified.
- 1.9 There are a number of limitations in the evidence set out in the Strategic Planning Evidence Base, notably:
- Estimates on the number of visitors to the Park are based on relatively small sample sizes and are therefore vulnerable to miscounts by electronic survey counters.
  - Limited data on the vulnerability of the Park's nationally and locally designated ecological assets to recreational pressure.
- 1.10 Drawing on the policy and environmental context, key opportunities and challenges were highlighted (including environmental problems, as required by the SEA Regulations).
- 1.11 A Strategic Environmental Assessment framework, from here on referred to as the 'SEA Framework', (see **Chapter 3**) was then developed. The SEA framework sets out the objectives against which the Strategic Policies are appraised and provides a way in which the environmental effects of the implementation of the Strategic Policies can be described, analysed and compared. The SEA Framework objectives, from here on referred to as the 'SEA objectives' define the Authority's long-term aspirations for the Park with regard to its environmental considerations. The SEA objectives help 'interrogate' the performance of the Strategic Policies in relation to these aspirations and environmental considerations.
- Stage B: Developing and refining options**
- 1.12 Regulation 12 (2) of the SEA Regulations requires that:
- "The (environmental or SA) report must identify, describe and evaluate the likely significant effects on the environment of—*
- (a) implementing the plan or programme; and*
  - (b) reasonable alternatives, taking into account the objectives and the geographical scope of the plan or programme"*
- 1.13 It should be noted that any alternatives considered to the plan need to be "reasonable". This implies that alternatives that are "not reasonable" do not need to be subject to appraisal. Examples include alternatives that do not meet the objectives of the plan or national policy (e.g. the National Planning Policy Framework), or are not within the geographical scope of the plan.
- 1.14 Given the strategic nature of the Strategic Policies and the fact that their range and content must reflect legislation, national policy and the latest local evidence, there are considered to be no reasonable alternatives.
- 1.15 Developing options for a plan is an iterative process involving a number of consultations with the public and other key stakeholders.
- 1.16 It also needs to be recognised that the SEA findings are not the only factors that have been taken into account in defining the preferred Strategic Policies. Factors such as public opinion, deliverability, conformity with national policy and law have also been taken into account by the Park Authority.

**Stage C: Reporting**

- 1.17 This SEA Report describes the process to date in carrying out the SEA of the Strategic Policies. It sets out the findings of the SEA, highlighting likely significant effects (both positive and negative, and taking into account likely secondary, cumulative, synergistic, short, medium and long-term and permanent and temporary effects).
- 1.18 Each Strategic Policy has been assessed against each SEA objective, and a judgement made with regards to the likely effects that the option would have on that objective. In considering the overall effects of the Strategic Policies, consideration is also given to the likely effects in-combination with other plans and programmes, as well as other parts of the Park Plan that may help to mitigate negative effects and maximise the benefits of the Strategic Policies.

## **Stage D: Consultation**

- 1.19 Public and stakeholder participation is an important element of the SEA and wider plan-making processes. It helps to ensure that Plans and their associated SEA reports are robust and have due regard for all appropriate information.
- 1.20 A SEA Scoping Report, including the PDF's policy context, key environmental issues and a draft SEA Framework was prepared and published for consultation with key riparian and statutory stakeholders, between September and October 2017, alongside a 'Consultation Report' containing a first draft of the strategic policies. This process helped to formulate the draft strategic policies.
- 1.21 Consultation responses were received from the three statutory consultees – Environment Agency, Historic England and Natural England – and the London Boroughs of Hackney, Tower Hamlets and Waltham Forest. The responses included advice and guidance on how the policy context and environmental baseline, key environmental challenges and opportunities and the SEA Framework could be updated and improved. Specifically, the Environment Agency suggested the inclusion of a new policy aim and set of criteria to cover flood risk and management.
- 1.22 The publication of the draft Strategic Policies and this accompanying SEA Report represented the second phase of consultation in 2018. A Members Panel was arranged for November 2018 to consider the proposed changes to the Strategic Policies and associated documents. This final SEA Report was approved by the Committee in January 2019, subject to various minor changes which have been reflected in this report.

## **Stage E: Monitoring**

- 1.23 **Chapter 4** of this SEA Report sets out recommendations for monitoring the significant environmental effects of the Strategic Policies once adopted.
- 1.24 **Table 1.1** below signposts the relevant sections of this SEA Report that are considered to meet the SEA Regulations requirements.

**Table 1.1: Meeting the Requirements of the SEA Regulations**

<b>SEA Regulations' Requirements</b>	<b>Covered in this Scoping Report?</b>
<b>Environmental Report</b> Where an environmental assessment is required by any provision of Part 2 of these Regulations, the responsible authority shall prepare, or secure the preparation of, an environmental report in accordance with paragraphs (2) and (3) of this regulation. The report shall identify, describe and evaluate the likely significant effects on the environment of:  (a) implementing the plan or programme; and (b) reasonable alternatives taking into account the objectives and geographical scope of the plan or programme.  (Regulation 12(1) and (2) and Schedule 2).	The full SEA Report for the Lee Valley Regional Park Authority's Strategic Policies will constitute the 'environmental report'.
1) An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.	Chapter 2 and Appendix 1.
2) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	Chapter 3 and Strategic Planning Evidence Base.
3) The environmental characteristics of areas likely to be significantly affected.	Chapter 3 and Strategic Planning Evidence Base.
4) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC on the conservation of wild birds and the Habitats Directive.	Chapter 3 and Strategic Planning Evidence Base.

<b>SEA Regulations' Requirements</b>	<b>Covered in this Scoping Report?</b>
5) The environmental protection, objectives established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation.	Chapter 2 and Appendix 1.
6) The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive effects, and secondary, cumulative and synergistic effects, on issues such as: <ul style="list-style-type: none"> <li>(a) biodiversity;</li> <li>(b) population;</li> <li>(c) human health;</li> <li>(d) fauna;</li> <li>(e) flora;</li> <li>(f) soil;</li> <li>(g) water;</li> <li>(h) air;</li> <li>(i) climatic factors;</li> <li>(j) material assets;</li> <li>(k) cultural heritage, including architectural and archaeological heritage;</li> <li>(l) landscape; and</li> <li>(m) the interrelationship between the issues referred to in subparagraphs (a) to (l).</li> </ul>	Chapter 4.
7) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	Chapter 4.
8) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	Chapter 1.
9) A description of the measures envisaged concerning monitoring in accordance with regulation 17.	Chapter 4.
10) A non-technical summary of the information provided under paragraphs 1 to 9.	See separate accompanying report.
The report shall include the information referred to in Schedule 2 to these Regulations as may reasonably be required, taking account of: <ul style="list-style-type: none"> <li>(a) current knowledge and methods of assessment;</li> <li>(b) the contents and level of detail in the plan or programme;</li> <li>(c) the stage of the plan or programme in the decision-making process; and</li> <li>(d) the extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication of the assessment.</li> </ul>	Chapter 1.
(Regulation 12 (3))	
<b>Consultation</b>	
When deciding on the scope and level of detail of the information that must be included in the environmental report, the responsible authority shall consult the consultation bodies.	Consultation with the relevant statutory environmental bodies was undertaken on an SEA Scoping Report between 31 <sup>st</sup> August and 27 <sup>th</sup> October 2017.
(Regulation 12(5))	
Every draft plan or programme for which an environmental report has been prepared in accordance with regulation 12 and its accompanying report ("the relevant documents") shall be made available for the purposes of consultation in accordance with the following provisions of this regulation.	This SEA Report was published alongside the draft Strategic Policies document for public consultation between 18 <sup>th</sup> April and 30 <sup>th</sup> May 2018
As soon as reasonable practical after the preparation of the relevant	

SEA Regulations' Requirements	Covered in this Scoping Report?
<p>documents, the responsible authority shall:</p> <ul style="list-style-type: none"> <li>(a) send a copy of those documents to each consultation body;</li> <li>(b) take such steps as it considers appropriate to bring the preparation of the relevant documents to the attention of the persons who, in the authority's opinion, are affected or likely to be affected by, or have an interest in the decisions involved in the assessment and adoption of the plan or programme concerned, required under the Environmental assessment of Plans and Programmes Directive ("the public consultees");</li> <li>(c) inform the public consultees of the address (which may include a website) at which a copy of the relevant documents may be viewed, and the period within which, opinions must be sent.</li> </ul> <p>The period of consultation must be of such length as will ensure that the consultation bodies and the public consultees are given an effective opportunity to express their opinion on the relevant documents.</p> <p>(Regulation 13 (1), (2), and (3))</p>	This SEA Report represents the final version.
<p>Where a responsible authority, other than the Secretary of State, is of the opinion that a plan or programme for which it is the responsible is likely to have significant effects on the environment of another Member State, it shall, as soon as reasonable practicable after forming that opinion:</p> <ul style="list-style-type: none"> <li>(a) notify the Secretary of State of its opinion and of the reasons for it; and</li> <li>(b) supply the Secretary of State with a copy of the plan or programme concerned, and of the accompanying environmental report.</li> </ul> <p>(Regulation 14 (1))</p>	Not relevant as there will be no effects beyond the UK.
<p><b>Taking the environmental report and the results of the consultations into account in decision-making (relevant extracts of Regulation 16)</b></p> <p>As soon as reasonably practicable after the adoption of a plan or programme for which an environmental assessment has been carried out under these Regulations, the responsible authority shall:</p> <ul style="list-style-type: none"> <li>(a) make a copy of the plan or programme and its accompanying environmental report available at its principal office for inspection by the public at all reasonable times and free of charge.</li> </ul> <p>(Regulation 16(1))</p>	This requirement will be met at a later date if appropriate.
<p>As soon as reasonably practicable after the adoption of a plan or programme the responsible authority shall inform (i) the consultation bodies; (ii) the persons who, in relation to the plan or programme, were public consultees for the purposes of regulation 13; and (iii) where the responsible authority is not the Secretary of State, the Secretary of State, that the plan or programme has been adopted, and a statement containing the following particulars:</p> <ul style="list-style-type: none"> <li>(a) how environmental considerations have been integrated into the plan or programme;</li> <li>(b) how the environmental report has been taken into account;</li> <li>(c) how opinions expressed in response to: (i) the invitation in</li> </ul>	This requirement will be met at a later date, if appropriate.

SEA Regulations' Requirements	Covered in this Scoping Report?
<p>regulation 13(2)(d); (ii) action taken by the responsibility in accordance with regulation 13(4)<sup>1</sup>, have been taken into account;</p> <p>(d) how the results of any consultations entered into under regulation 14(4)<sup>2</sup> have been taken into account;</p> <p>(e) the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and</p> <p>(f) the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.</p>	
<p><b>Monitoring</b></p> <p>The responsible authority shall monitor the significant effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action.</p> <p>(Regulation 17(1))</p>	See Chapter 4.

## Habitats Regulations Assessment

- 1.25 The LVRPA considered the Draft Strategic Policies in light of the assessment requirements of regulation 63/105 of the Conservation of Habitats and Species Regulations 2017. LVRPA is the competent authority responsible for adopting the Strategic Policies and any assessment of it required by the Regulations.
- 1.26 Following a 'screening' assessment of the Draft Strategic Policies it was considered that a likely significant effect on the Epping Forest Special Area of Conservation, as a result of air pollution caused by strategic policies in-combination with other plans and projects, could not be ruled out. Consequently, an appropriate assessment was required of the implications of the Draft Strategic Policies on the qualifying features of the Epping Forest SAC in light of its conservation objectives. Likely significant effects associated with the Lee Valley Special Protection Area and Ramsar could also not be ruled out.
- 1.27 Following an appropriate assessment in accordance with the Regulations, the LVRPA ascertained that the Draft Strategic Policies would not have an adverse effect on the integrity of the Lee Valley Special Protection Area and Ramsar and Epping Forest Special Area of Conservation either alone or in combination with other plans or projects.
- 1.28 Natural England was consulted on the findings and conclusions of this assessment in December 2018. In a letter dated 16 January 2019, they expressed agreement with the conclusions of the HRA. They advised that subsequent reviews of the strategic policies, area proposals and the Biodiversity Action Plan should have regard to the outcome of recreational disturbance monitoring at SPA sites, particularly at Walthamstow Wetlands, and amendments made to policy and proposals if necessary.

## Status of the Park and the Park Authority

- 1.29 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 sets out the duty of the Authority to:
- “develop, improve, preserve and manage the park as a place for the occupation of leisure, recreation, sport, games or amusements.... for the provision of nature reserves and for the provision and enjoyment of entertainment of any kind” (Section 12 (1)).

<sup>1</sup> Regulation 13 (4) – The responsible authority shall keep a copy of the relevant documents available at its principal office for inspection by the public at all reasonable times and free of charge.

<sup>2</sup> Regulation 14 (4) – Where the Secretary of State receives from a Member State an indication that it wishes to enter into consultations before the adoption, or submission to the legislative procedure for adoption, of a plan or programme forwarded to it.

- “prepare a plan showing proposals for the future use and development of the Park” (Section 14 (1)).
- 1.30 The LVRPA is not a Local Planning Authority and the Park Plan is not a statutory development plan, i.e. the LVRPA does not have the power to undertake or give any consent or other authorisation for a plan or project, so there is no statutory duty to:
- submit the Park Plan to the Secretary of State for independent examination; or
  - subject the Park Plan to Sustainability Appraisal (SA) required under the Planning and Compulsory Purchase Act 2004.
- 1.31 As a public body preparing a policy document the Park Authority is required to comply with the Strategic Environmental Assessment (SEA) Directive (European Directive 2001/42/EC) as transposed into law in England by the SEA Regulations 2004.
- 1.32 Under the LVRPA Act, the Authority’s adopted proposals included in the Park Plan are required to form part of the Local Plans of the riparian authorities<sup>3</sup>.
- 1.33 Although the Park Plan forms part of the riparian authorities’ respective statutory development plans, its inclusion does not imply acceptance.

## Structure of this document

- 1.34 This SEA Report is structured into the following sections which are broadly consistent with Schedule 2 of Regulation 12(3) of the SEA Regulations:
- **Chapter 1** describes the process of SEA, the status of LVRPA and the structure of the SEA Report.
  - **Chapter 2** describes the plans, policies, programmes and environmental objectives of relevance to the Strategic Policies, as well as the baseline information and key environmental challenges and opportunities, which have informed the SEA of the Strategic Policies.
  - **Chapter 3** presents the SEA Framework used in the assessment of Strategic Policies and the method for carrying out the SEA.
  - **Chapter 4** presents the assessment results for the SEA of the Strategic Policies, including cumulative effects, other policy mechanisms that will help to mitigate potential negative effects and to enhance positive effects of the Strategic Policies and monitoring proposals for the effects identified.
  - **Chapter 5** sets out the conclusions of the SEA.

---

<sup>3</sup> Essex and Hertfordshire County Councils; Broxbourne Borough Council, East Herts District Council and Epping Forest District Council; London Boroughs of Enfield, Hackney, Haringey, Newham, Tower Hamlets and Waltham Forest (6).

## 2 Environmental Context

### Relevant Planning and Policy Context

- 2.1 Schedule 2 of the SEA Regulations requires:
- (1) *An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans or programmes.*
- (5) *The environmental protection objectives established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation.*
- 2.2 In order to establish a clear scope for the SEA of the Strategic Policies it is necessary to put the Park Plan within an appropriate planning and policy context. This section sets out the role and contents of the Park Plan and its relationship with other plans and policies.

#### The Park Plan

- 2.3 The current Park Plan was adopted in April 2000. It consists of two parts:
- **Part one** outlines the Strategic Policy Framework for the Park, including Strategic Policies and Objectives for its future use and development.
  - **Part two** sets out particular proposals for the future use and development of individual sites and areas that collectively form the totality of the Regional Park.
- 2.4 The Authority is in the process of preparing the Park Development Framework (PDF), a suite of documents which will establish its aspirations and specific proposals for the future use and development of the Regional Park. In July 2010, the Authority adopted the Vision, Strategic Aims and Principles. These were followed by the adoption of a series of Thematic Proposals for development and management across the Park in January 2011.
- 2.5 The Authority is now in the process of preparing Area Proposals for the future use and development of individual sites and areas. Five Area Proposals have been adopted to date covering the southern half of the Park; Proposals for Areas 6, 7 and 8 have yet to be adopted.

#### Purpose of the new Strategic Policies

- 2.6 The purpose of the new Strategic Policies is to replace Part 1 of the Park Plan (2000). This needs to be updated to put the Park's Aims, Vision and Principles, Thematic Proposals and Area Proposals within a more up to date strategic policy context. The new Strategic Policies represent the final component of the Park's PDF which will then replace the Park Plan (2000) and provide a planning strategy up to 2036.
- 2.7 While the Riparian Authorities have no obligation to accept the contents of the PDF, including the new Strategic Policies, they form part of the planning context against which the Riparian Authorities plan appropriate development in the Park. The complete PDF will also guide the Lee Valley Regional Park Authority's responses to development proposals for land and property within the Park, whether they originate with the Park Authority, the Riparian Authorities or other stakeholders. As such, the new strategic policies inform the future master planning and project development of sites within and adjoining the Park.

#### Relationship between the Park Plan and other Plans

- 2.8 Given that the LVRPA is not a Local Planning Authority and the Park Plan is not a statutory development plan, the Park Plan is not required to be in conformity with International, National, Regional or Local Planning Policy. However, for the Park Plan to effectively engage with the planning process it must have regard to such plans, policies and programmes.

## *National Planning Policy Framework*

2.9 The NPPF (2019) provides overarching planning policy for England. Of particular significance to the LVRP is the NPPF's emphasis on protecting Green Belt land and conserving and enhancing the natural environment.

### *Green Belt*

2.10 Almost all of the LVRP is designated either as Green Belt or Metropolitan Open Land (a London Plan designation). This reflects Sir Patrick Abercrombie's original vision of the original Green Belt including 'parkways', stretching from central London to the outlying countryside. The Lee Valley is the best example of such a parkway.

2.11 The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence (NPPF, para.133). The NPPF makes clear that it is for local planning authorities to review the boundaries of Green Belt, but that changes should only be made in exceptional circumstances.

2.12 Once exceptional circumstances for Green Belt release have been defined:

- prioritisation should be given to the release of Green Belt land that has been previously-developed and/or well-served by public transport (para. 138);
- the release of Green Belt land should be appropriately offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land (para. 138).

2.13 Para. 138 indicates that, where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.

2.14 Para 141 also indicates that, once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.

### *Conserving and enhancing the natural environment*

2.15 The NPPF does not refer specifically to regional parks, but paragraph 170 confirms that the planning system should contribute to and enhance the natural and local environment by:

- protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
- minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
- preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and,
- remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

- 2.16 The NPPF stipulates that regard should be given to the cumulative impacts of flood risk, rather than just looking at the flood risk impact of individual development sites (para. 156).

#### *National Planning Practice Guidance*

- 2.17 The National Planning Practice Guidance (NPPG) is a web-based resource that provides revised and updated planning guidance setting out what the Government expects from local authorities. The resource directly refers to the NPPF and is periodically updated by the government. The Ministry of Housing, Communities & Local Government is currently in the process of updating the NPPG, in line with the updated 2019 NPPF. Some references within the NPPG to the NPPF are therefore out of date.
- 2.18 NPPG states that open space can provide 'health and recreation benefits to people living and working nearby; have an ecological value and contribute to green infrastructure (NPPF para. 114), as well as being an important part of the landscape and setting of built development, and an important component in the achievement of sustainable development (NPPF para. 6-10)'.<sup>4</sup> Importantly for the LVRPA, the NPPF notes that it is for local planning authorities to assess the need for open space and opportunities for new provision in their areas. Furthermore local authorities have the 'duty to cooperate'<sup>5</sup> where open space serves a wider area.<sup>6</sup>
- 2.19 NPPG notes that 'Local and neighbourhood plans and planning decisions have the potential to affect biodiversity or geodiversity outside as well as inside designated areas of importance for biodiversity or geodiversity. Local planning authorities and neighbourhood planning bodies should therefore seek opportunities to work collaboratively with other partners, including Local Nature Partnerships, to develop and deliver a strategic approach to protecting and improving the natural environment based on local priorities and evidence. Equally, they should consider the opportunities that individual development proposals may provide to enhance biodiversity and contribute to wildlife and habitat connectivity in the wider area'.<sup>7</sup>

#### *London Plan*

- 2.20 The London Plan is the spatial development strategy for Greater London. The current London Plan, adopted in 2016, places considerable emphasis on the importance of green infrastructure in London and the 'All London Green Grid' Supplementary Planning Guidance includes green infrastructure proposals for the Lee Valley within Greater London.
- 2.21 The Mayor has commenced a review of the London Plan and a new version is expected to be published in 2019. Early indications are that the new London Plan will have a stronger 'spatial strategy' which may include sub-regional strategies and plans prepared by boroughs or groupings of boroughs. There is therefore an opportunity to ensure that the new strategic policies for the Park are reinforced by the London Plan.
- 2.22 London Plan Policy 2.18 on Green Infrastructure indicates that:
- A. *The Mayor will work with all relevant strategic partners to protect, promote, expand and manage the extent and quality of, and access to, London's network of green infrastructure. This multifunctional network will secure benefits including, but not limited to, biodiversity; natural and historic landscapes; culture; building a sense of place; the economy; sport; recreation; local food production; mitigating and adapting to climate change; water management; and the social benefits that promote individual and community health and well-being.*
  - B. *The Mayor will pursue the delivery of green infrastructure by working in partnership with all relevant bodies, including across London's boundaries, as with the Green Arc Partnerships and Lee Valley Regional Park Authority. The Mayor has published supplementary guidance on the All London Green Grid to set out the strategic objectives and priorities for green infrastructure across London (emphasis added).*
- 2.23 The importance of green infrastructure is further reflected in the Mayor's London Infrastructure Plan 2050 and the Green Infrastructure Task Force report (2015). This makes a number of

<sup>4</sup> <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

<sup>5</sup> <https://www.gov.uk/guidance/duty-to-cooperate>

<sup>6</sup> <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

<sup>7</sup> <https://www.gov.uk/guidance/natural-environment>

recommendations, including the appointment of a Green Infrastructure commissioner and, a review of governance, better support for a sub-regional approach to green infrastructure. It also recommends a series of objectives for green infrastructure, which are closely aligned to the objectives of the LVRP:

- *Promoting Healthy Living – improving health outcomes by increasing physical activity, reducing stress, provision of tranquil areas and removing pollutants.*
- *Strengthening Resilient Living – keeping the city cool, its air clean, and protecting it from flooding.*
- *Encouraging Active Living – increasing levels of walking and cycling.*
- *Creating Living Landscapes – enhancing natural processes for the benefit of people and wildlife and conserving the most special landscapes, habitats and species.*
- *Enhancing Living Space – providing a range of outdoor space for cultural, civic, learning and community activity, including productive landscapes.*

2.24 The Task Force's recommendations have been included in the draft London Environment Strategy (August 2017).

*The Mayor's Opportunity Areas in London*

*Lower Lea Valley Opportunity Area Planning Framework*

2.25 The Lower Lea Valley Opportunity Area Planning Framework was published by the Mayor of London in January 2007 and set out his views on how the Lower Lea Valley as whole should change through the intensification of existing activities, the upgrading of facilities and buildings, and the managed release of industrial land to provide a broader range of land uses. The Lower Lea Valley OAPF is currently being updated.

2.26 The Olympic Legacy Supplementary Planning Guidance (OLSPG), published in July 2012, replaces the Lower Lea Valley OAPF where the two areas overlap. This has been taken forward through the adopted Local Plan (2015) prepared by the London Legacy Development Corporation (LLDC). Work has recently commenced on revising this plan.

*Upper Lea Valley Opportunity Area Planning Framework*

2.27 The Upper Lea Valley Opportunity Area Planning Framework was published by the Mayor in July 2013. The OAPF sets out eight objectives for the area:

- growth at Tottenham Hale, Blackhorse Lane, Meridian Water in Central Leeside and Ponders End
- optimised development and redevelopment opportunities along the A10/A1010 Corridor, in particular the Tottenham High Road Corridor and Northumberland Park
- over 15,000 new jobs by 2031 across a range of industries and a green industrial hub creating greater learning and employment opportunities
- over 20,100 new well designed homes by 2031
- full integration between the existing communities and the new jobs, homes and services provided as part of the new developments
- a Lee Valley Heat Network linked to the Edmonton Eco Park
- significant investment and improvements to transport infrastructure, including four trains per hour on the West Anglia Main Line and improvements to help people walk and cycle more easily through the area
- a fully accessible network of green and blue spaces which open up the Lee Valley Regional Park. The networks between them will be improved benefitting both people and wildlife

2.28 The GLA is in the process of revising this document which is likely to reflect its new regeneration priorities and refer to Crossrail 2.

### *Housing Zones*

- 2.29 The Mayor has set out plans for the development of 30 Housing Zones in partnership with London boroughs and their development partners as part of his Housing Strategy. A total of £600 million in funding has been made available by the Mayor and government for the construction of 75,000 new homes. The programme is also expected to provide 150,000 associated jobs over the next ten years.
- 2.30 The building of homes in Housing Zones will be supported by a range of planning and financial measures. All Housing Zones will be set up by an agreement which shares the duty of building these homes between partners. This will ensure the numbers of planned new homes are built.
- 2.31 Three Housing Zones are situated close to or partly within the Lee Valley Regional Park. These are<sup>8</sup>:
- LB Waltham Forest – Blackhorse Lane and Northern Olympic Park 2,608 homes
  - LB Enfield – Meridian Water and Edmonton Futures 10,000 homes<sup>9</sup>
  - LB Haringey – North Tottenham 1,956 homes
  - LB Tower Hamlets – the Poplar Riverside, 9,000 homes in total over 15 years (ref LBTH Housing Delivery Strategy Sept 2017)

### *London Environment Strategy*

- 2.32 The Mayor published a public consultation draft of the London Environment Strategy in August 2017. This includes a number of commitments relating to green infrastructure, many of which are relevant to the LVRP:
- 'to make London the first National Park City, including providing a Greener City Fund
  - to support communities to plant more trees and improve green spaces
  - to increase and improve green infrastructure in areas where Londoners, especially children, have the least amount of green space
  - to use a new Urban Greening Factor to make sure that new developments are greener
  - to protect London's Green Belt from further development
  - to set up a London Green Spaces Commission to roll out new ways for the Mayor, London boroughs, community groups and others to fund, manage and value green spaces and nature
  - to identify the true economic value of London's green spaces through a Natural Capital Account
  - to use the planning system to protect London's biodiversity, offsetting any reductions caused by new developments with increases elsewhere'.

### *Riparian Authorities' Local Plans*

- 2.33 The Riparian Authorities are at various stages of Local Plan preparation. Those in London are seeking to reflect the London Plan policies and aspiration, while those in Essex and Hertfordshire have their own strategic focus.
- 2.34 All of the authorities face similar issues, in terms of seeking to accommodate significant housing growth targets, while retaining sufficient protected land for other uses such as employment, community facilities, schools and open space etc. These issues are particularly acute in the London boroughs where almost all of the authorities already have deficiencies of open space.
- 2.35 While the Regional Park is not intended to make up for the open space deficiencies of the riparian boroughs it clearly plays an increasingly important role in providing semi natural open space and green infrastructure and contributes to addressing open space deficiencies in these boroughs.

<sup>8</sup> [https://www.london.gov.uk/sites/default/files/housing\\_zones\\_brochure\\_march\\_2016\\_5.pdf](https://www.london.gov.uk/sites/default/files/housing_zones_brochure_march_2016_5.pdf)

<sup>9</sup> <https://new.enfield.gov.uk/news-and-events/edmonton-housings-33-million-boost/>

### *Mayor's Transport Strategy*

- 2.36 The Mayor's Transport Strategy sets out the Mayor's policies and proposals to reshape transport in London over the next two decades. Three key themes are at the heart of the Strategy: (1) healthy new streets and healthy people; (2) a good public transport experience; and, (3) new homes and jobs.
- 2.37 The Strategy includes a target for 80% of all trips in London to be by walking, cycle or public transport by 2041 and this is reflected in the draft New London Plan 2017.

### *Draft new London Plan (2017)*

- 2.38 The Mayor published a draft new London Plan on 29<sup>th</sup> November with the formal consultation period commencing on Friday 1<sup>st</sup> December 2017 until Friday 2<sup>nd</sup> March 2018. The Examination will take place early in 2019 and it is anticipated that the plan will be published in Autumn 2019.
- 2.39 The key points of significance to the Park include:
- The Draft Plan continues to protect Green Belt and Metropolitan Open Land.
  - Aims to make London 50% green by 2050 in order to help make London a 'National Park City'.
  - Aims to make the Green Belt and MOL more accessible and better quality.
- 2.40 The draft London Plan also sets an overarching objective to plan for 'good growth' – sustainable growth that works for everyone – aiming to deliver genuinely affordable homes and a more socially integrated and sustainable city. As part of the Lee Valley Opportunity Area there will be an increase in housing development and densities close to the Park's boundary. This will create both opportunities and challenges for the Authority, for example to ensure green space and infrastructure within development complement and connect with the Park, to secure enhancements for the Park as part of the development process and strengthen the carrying capacity of the parklands, protect sensitive ecological assets and address flood risk and water quality issues.

## **Baseline Information**

- 2.41 Schedule 2 of the SEA Regulations requires information to be provided on:
- (2) *The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan.*
  - (3) *The environmental characteristics of areas likely to be significantly affected.*
  - (4) *Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC on the conservation of wild birds and the Habitats Directive.*
- 2.42 The baseline information set out and sign posted to within this section is organised under the environmental issues set in Schedule 2 of Regulation 12(3) of the SEA Regulations. This baseline information forms the basis for predicting and monitoring the likely significant environmental effects of the new Strategic Policies and helps to identify the key challenges and opportunities the Park faces and must Plan for.

### **Population**

- 2.43 According to the London Plan, London's population is expected to rise from 8.2 million in 2011, to: 9.20 million in 2021; 9.54 million in 2026; 9.84 million in 2031; and 10.11 million in 2036. The draft London Plan 2017 provides a longer term and revised population projection of 10.8 million by 2041. All the Park's riparian authorities are expected to experience 20%-29% growth in population by 2026. This will have major implications for the use of land and the role and function of the Park.
- 2.44 Such population growth is exacerbating the current shortfall in housing provision in the region. For example, the West Essex and East Hertfordshire Housing Market Area (HMA) has a need to

deliver 51,100 new homes between 2011 and 2033, with c.18,000 in East Hertfordshire, c.11,000 in Epping Forest District Council and 9,000 in Harlow. This chronic need for homes is and will continue to put pressure on the Park to accommodate new development to meet the needs of the growing population. An increase in the Park's catchment population will have implications for 'visitor infrastructure' within the Park and how well the open spaces and more sensitive sites cope with visitor pressure.

### **Human Health**

- 2.45 The Park provides a range of types of infrastructure and facilities which benefit human health and well-being, namely:
- its openness and tranquillity;
  - its sports development programme;
  - as a destination for education, volunteering, formal and informal recreation and food production; and,
  - the capacity of its green infrastructure to moderate the effects of climate change and poor air quality and connect people with nature, the countryside and active lifestyles.
- 2.46 Chapter 2 of the Strategic Planning Evidence Base sets out the details of the Park's Visitors, including their ages, visit frequencies, travel distances, modes of transport to and from the Park and socio-economic profile. The Chapter goes on to highlight some of the key issues associated with the visitor profile of the Park, notably:
- the limited entrance points from which the Park can be accessed on foot, by bicycle or train;
  - the small proportion of younger visitors, people between the ages of 16 and 24 years old; and
  - poor provision of visitor facilities within certain areas of the Park, including popular areas that require enhanced facilities.
- 2.47 Chapter 3 of the Strategic Planning Evidence Base sets out the details of the Park's sport and recreation facilities, including pedestrian, cycleway and bridleway networks, green infrastructure for natural play and education and informal and formal sports facilities including athletics, swimming, tennis, hockey, ice skating, fishing, sailing, boating, rafting, canoeing and windsurfing. This chapter goes on to highlight some of the key issues associated with the Park's sport and recreation facilities, notably:
- the recreational pressures put on the Park's flora and fauna; and,
  - the adverse effects of the infrastructure associated with such formal and informal facilities on the openness and character of the Park's landscapes.
- 2.48 Chapter 5 of the Strategic Planning Evidence Base sets out the details of the Park's community facilities – temporary and permanent art installations and venues, cultural, sport and recreational events spaces and services and facilities for formal education and informal volunteering – all of which generate health and well-being benefits for the Park's users, including increasing physical activity of all demographics and cultures. This chapter goes on to highlight some of the key issues associated with the Park's community facilities, notably perceived personal safety issues and anti-social behaviour.

### **Biodiversity, Flora and Fauna**

- 2.49 The Park provides a range of infrastructure and services which benefit biodiversity, flora and fauna, namely the Park's:
- water bodies and water ways;
  - nature reserves and open spaces; and
  - internationally and nationally designated wildlife sites.
- 2.50 Chapter 4 of the Strategic Planning Evidence Base sets out the details of the Park's ecological assets, including plants, invertebrates, amphibians, mammals and fish; and its ecological

designations, including the Amwell Quarry, Rye Meads, Turnford and Cheshunt Pits and Walthamstow Reservoir SSSIs which form the Lee Valley Special Protection Area and Ramsar Site. Chapter 4 also notes the invasive non-native species that live within the Park. This chapter goes on to highlight some of the key issues associated with the Park's ecological assets, namely:

- the potential for new development and infrastructure to adversely affect biodiversity;
- unfavourable condition of SSSIs and need for partnership working to improve these habitats;
- from the need to manage the populations of invasive species;
- the opportunities to enhance and expand the Park's green infrastructure network by linking-up isolated habitats and improving accessibility to the Park's green spaces;
- the pressures put on the Park's biodiversity by the Park's growing number of visitors; and,
- the development of new access and visitor facilities to enhance the access to nature.
- Controlling the spread of invasive non-native species

### Cultural Heritage

2.51 Chapter 6 of the Strategic Planning Evidence Base sets out the details of the Park's heritage assets, including architecture, archaeology and historic landscapes. This chapter goes on to highlight some of the key issues associated with the Park's historic assets, notably:

- the potential for new development to adversely affect the integrity, setting and special character of heritage assets; and,
- opportunities to enhance the character of the Park's historic landscapes and townscapes by conserving and managing the setting, special character and accessibility of the Park's historic assets and views.

### Landscape

2.52 Chapter 6 of the Strategic Planning Evidence Base sets out the details of the Park's landscape features and characteristics, including its geology, hydrology, landscape character, landscape sensitivity and historic landscapes and townscapes. This chapter goes on to highlight some of the key issues associated with the Park's landscape features and characteristics, notably:

- the potential for new development to adversely affect the openness of the Park, including Green Belt and Metropolitan Open Land, urbanise its countryside and obstruct important views within, into and out of the Park;
- the need to improve the visual appearance and permeability of the Park's boundaries;
- the importance of landscape quality and character in terms of the visitor experience, its role in improving health and well-being and how it relates to habitat creation and enhancement and historic character; and,
- wider impacts on the landscapes and townscapes that lie adjacent to and within view of the Park.

### Climatic Factors

#### *Energy Consumption and Related Greenhouse Gas Emissions*

2.53 Chapter 7 of the Strategic Planning Evidence Base sets out the details of the Park's low carbon and renewable energy generation infrastructure, including Kings Yard and Stratford City Energy Centre (bio-fuels), Edmonton Eco Park (waste incinerator), Enfield Energy Centre (gas powered), and Rye House Power Station (gas powered), all of which lie adjacent to the Park. This chapter goes on to highlight a key issue associated with low-carbon and renewable energy generation within and in the immediate vicinity of the Park, notably the potential for such facilities to adversely affect the special qualities of the Park, such as its landscape character, openness, biodiversity and tranquillity.

### *Flood Risk*

- 2.54 Chapter 7 of the Strategic Planning Evidence Base sets out the details of the Park's flood risk and defences, including the Lee Flood Relief Channel through the mid-section of the valley, as well as a number of weirs and locks that regulate water levels and flow along the River Lee Navigation. This chapter goes on to highlight some key issues associated with flood risk in the Park, notably:
- approximately 63% of the Park is classified as being prone to either fluvial or tidal flooding;
  - changing land uses to less porous surfaces over recent decades has resulted in increased risk of fluvial flooding – a trend which is expected to continue into the future as the climate changes and storm events become more severe;
  - New development in the Park has the potential to increase surface run-off, thereby increasing risk of flooding; and,
  - New and improved hard flood defences could adversely affect the special qualities of the Park.

- 2.55 As a global issue, climate change will continue to be a key consideration, regardless of the content of the Strategic Policies.

### *Drought*

- 2.56 Chapter 7 of the Strategic Planning Evidence Base highlights the role of features, including wetlands, Lee Flood Relief Channel, weirs and locks for managing water flow in times of drought. Chapter 7 goes on to highlight the issue of increased risk of drought, which will require improved infrastructure to increase resilience in this regard.

### **Air Quality**

- 2.57 The Park's wide expanse of vegetation plays a role in keeping the air clean. This, in combination with the absence of sources of pollution (e.g. road traffic within the Park), means local air quality is better than surrounding areas and the Park provides a refuge for people and wildlife.
- 2.58 National environmental standards as well as the Riparian Authorities' Local Plans and the London Plan include policies that will appropriately minimise and manage poor air quality within and in the immediate vicinity of the Park.

### **Soil Quality**

- 2.59 Chapter 7 of the Strategic Planning Evidence Base highlights the varying degree of soil quality within the Park. It notes that some areas of the Park contain underground materials with various levels of contaminants. These contaminants are likely to be located in areas classed as non-agricultural and urban land where soil has been degraded through contamination, urbanisation and mineral extraction. The presence of contaminated land raises challenges of how to best use contaminated sites in a way which fulfils the Authority's statutory purpose.
- 2.60 National environmental standards as well as the riparian authorities' Local Plans and the London Plan include policies that will appropriately minimise and manage poor soil quality within and in the immediate vicinity of the Park.

### **Water Quality**

- 2.61 Chapter 7 of the Strategic Planning Evidence Base sets out the details of the Park's waterbodies and waterways, including their uses and functionality, the River Lee Catchment, water supply and treatment, sewage treatment, sedimentation, nutrient and pollution retention, water-based recreation, including watercraft movements. This chapter goes on to highlight a key issue associated with the integrity and quality of the Park's water bodies and water ways. A number of factors are identified to influence water supply, which include over-abstraction for public water supply, recreational activities, effluent discharge from Rye Meads and Deephams Sewage Treatment plants, pollutants from boats, litter from commercial and industrial premises and polluted run-off from surrounding urban areas.
- 2.62 National environmental standards as well as the riparian authorities' Local Plans and the London Plan include policies that will appropriately minimise and manage poor water quality within and in the immediate vicinity of the Park. However, the LVRPA has an important role to play in improving

the water quality and riparian habitat of the area through its influence on Local Planning Authority Local Plans, parkland management, and potential involvement in enhancement schemes.

### **Material Assets**

2.63 The Strategic Planning Evidence Base describes the details of the Park's material assets. Noteworthy assets include:

- Queen Elizabeth Olympic Park – constructed for the 2012 Olympic Games the Park transformed a large area of polluted former industrial land into an international sports and events venue. 35% of the Olympic Park falls within the Lee Valley Regional Park.
- Community Infrastructure – pedestrian, cycleway and bridleway networks, green infrastructure for natural play and education and informal and formal sports facilities including athletics, swimming, tennis, hockey, ice skating, fishing, sailing, boating, rafting, canoeing and windsurfing.
- Transport Infrastructure – The West Anglia Mainline, running from north to south to the west of the Park, is due to be upgraded from two to four tracks increasing frequency from two to four trains per hour. The proposed Crossrail 2 will also run from Tottenham Hale to Broxbourne, running along the upgraded railway tracks of the West Anglia Mainline.
- Energy Infrastructure – electricity lines, pylons, major substations and electricity line tunnels that run through the lower Lee Valley. There are also a number of fuel and gas pipelines that pass through the Park serving major infrastructure.
- Waste Infrastructure – small number of waste management operations, the largest of which is the Edmonton Ecopark where waste incineration, bulk recycling, composting and wood chipping occur, which sits in close proximity to the Park.
- Agricultural Infrastructure – commercial glasshouses, other farms providing commercial, dairy and arable products and allotments.
- Mineral Resource – the Park has historically been home to a significant amount of sand and gravel extraction. However, there are currently no mineral workings in operation.

2.64 The Strategic Planning Evidence Base document highlights some key issues associated with the material assets of the Park, notably:

- the waste products that are generated from the variety of material operations within the Park have the potential to have an adverse impact on the special qualities of the Park; and,
- the potential for new development associated with the intensification and expansion of these material operations to adversely affect the special qualities of the Park.

## **Challenges and Opportunities in the Lee Valley and Likely Evolution without the Plan**

2.65 Analysis of the baseline information has enabled a number of key environmental issues facing the Park to be identified. Identification of these key challenges and opportunities, consideration of how these issues might develop over time and how the Plan might influence them is a requirement of Schedule 2 of the SEA Regulations, specifically providing:

- (2) *The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan.*
- (4) *Any existing environmental problems which are relevant to the plan.*

### **Scoping the Challenges and Opportunities that can be influenced by the Park Plan**

2.66 The Lee Valley Regional Park Act (1966) sets out:

- a) the duty of the Authority to "develop, improve, preserve and manage the Park as a place for the occupation of leisure, recreation, sport, games or amusements....for the provision

*of nature reserves and for the provision and enjoyment of entertainment of any kind"* (Section 12 (1)), and

- b) the requirement that the authority prepare a Plan for the future management and development of the Regional Park.

2.67 All environmental issues<sup>10</sup> have been scoped in to the SEA of the new Strategic Policies on the grounds that the policies offer an opportunity to directly and/or indirectly significantly effect, in a positive way, existing trends in relation to all issues:

- Population
- Human Health
- Biodiversity, Flora and Fauna
- Cultural Heritage
- Landscape
- Climatic Factors
- Air, Soil and Water Quality
- Material Assets

2.68 **Table 2.1** below distils the environmental issues identified into a series of concise challenges and opportunities that have the potential to be directly influenced by the new Strategic Policies. **Table 2.1** also considers the likely evolution of the environment in the Lee Valley Regional Park if the Strategic Policies were not implemented.

**Table 2.1: Challenges and Opportunities in the Lee Valley and their Likely Evolution without the Strategic Policies**

Challenges and Opportunities	Likely Evolution without the Strategic Policies	SEA Regulations Environmental Issue(s)
Financial pressures on the Park.	The implementation of the Park's Strategic Policies offers an opportunity to increase and diversify the Park's income to help relieve the financial pressures on the Park. Without Strategic Policies that proactively and positively tackle this issue resulting in an increase in the range and quality of the Park's services and facilities, it is likely that the financial pressures on the Park will grow, hindering the ability of the Authority to address its other challenges and opportunities.	Population Human Health Biodiversity, Flora and Fauna Cultural Heritage Landscape Climatic Factors Air Quality Soil Quality Water Quality Material Assets
There are opportunities to enhance and diversify the facilities and services of the Park to the benefit of the health and wellbeing of the Park's users without causing significant harm to the Green Belt or	The Riparian Authorities' Local Plans as well as the London Plan include policies to protect and enhance local services and facilities, including open spaces designated as Green Belt and MOL within the Lee Valley Regional Park. The implementation of the Park's Strategic Policies offers an opportunity to dictate how the Park's services and facilities are improved and	Population Human Health Biodiversity, Flora and Fauna Cultural Heritage

<sup>10</sup> The environmental issues are set out in Schedule 2 of Regulation 12(3) of the SEA Regulations.

Challenges and Opportunities	Likely Evolution without the Strategic Policies	SEA Regulations Environmental Issue(s)
Metropolitan Open Land (MOL).	diversified. Without the implementation of the Strategic Policies it is considered that the Park's facilities and services, Green Belt land and MOL would be protected, however the Park would likely make a more limited contribution in shaping their future for the benefit of the Park's users.	Landscape Material Assets
Protect and enhance the Park's special qualities in the face of increasing development pressure and land use change within and adjacent to the Park.	The Riparian Authorities' Local Plans as well as the London Plan include policies to protect and enhance the tranquillity and openness of the Park's spaces, its biodiversity including flora and fauna, historic environment, landscapes and townscapes. The implementation of the Park's Strategic Policies offers an opportunity to dictate which special qualities are in the greatest need of protection and enhancement and in so doing help direct where development should go within and in the immediate vicinity of the Park. Without the implementation of the Strategic Policies it is considered that the Park's special qualities would be protected, however the Authority would likely make a more limited contribution in shaping their future and the pattern of development within and in the immediate vicinity of the Park.	Population Human Health Biodiversity, Flora and Fauna Cultural Heritage Landscape Material Assets
Relatively poor use of the parklands and venues by people living and working close to the Park boundaries, specifically young people.	The implementation of the Park's Strategic Policies offers an opportunity to directly encourage people living and working close to the Park boundaries, including young people, to use it. Without Strategic Policies that proactively and positively tackle this issue by increasing the range and quality of the Park's services and facilities and improving the attractiveness and permeability of its boundaries, it is likely that a significant proportion of local people will continue to be discouraged from using the Park.	Population Human Health
There is a need to improve the visual appearance and permeability of the Park's boundaries so that visitors can and want to access the Park on foot and by bicycle.		Human Health Landscape
There is significant pressure on the Park's biodiversity, flora and fauna as a result of increasing recreational pressures associated with rises in visitor numbers.	The Riparian Authorities' Local Plans as well as the London Plan include policies to protect and enhance biodiversity, flora and fauna. The implementation of the Park's Strategic Policies offers an opportunity to direct how the Park's recreational pressures are managed. Without the implementation of the Strategic Policies it is considered that the Park's biodiversity, flora and fauna would be protected (e.g. through the River Lee Country Park management plan which is an internal document), however the Authority would likely make a more limited contribution in shaping how recreational pressures in the Park	Population Biodiversity, Flora and Fauna

<b>Challenges and Opportunities</b>	<b>Likely Evolution without the Strategic Policies</b>	<b>SEA Regulations Environmental Issue(s)</b>
	are managed and may miss out on opportunities to secure enhancement and mitigation for biodiversity in the Park.	
There are opportunities to enhance and expand the Park's green and blue infrastructure networks by linking-up isolated habitats.	The Riparian Authorities' Local Plans as well as the London Plan include policies to protect and enhance green and blue infrastructure. The implementation of the Park's Strategic Policies offers an opportunity to direct how the Park's green and blue infrastructure are expanded, connected and managed. Without the implementation of the Strategic Policies it is considered that the Park's green and blue infrastructure would be protected, however the Authority would likely make a more limited contribution in shaping how such strategic infrastructure is improved at the metropolitan scale.	Human Health Biodiversity, Flora and Fauna Landscape
Climate change and development within the Park over recent decades has resulted in an increased risk of fluvial flooding – a trend which is expected to continue. Climate change is also expected to increase the risk of drought in the future.	The Riparian Authorities' Local Plans as well as the London Plan include policies to help mitigate and adapt to the effects of climate change, including flood risk and drought. The implementation of the Park's Strategic Policies offers an opportunity to contribute positively and proactively to climate change mitigation and adaptation measures at a local and regional scale. However as a global issue, climate change will continue to be a key consideration, regardless of the content of the Strategic Policies.	Climatic Factors Human health Biodiversity Landscape
Effluent discharge, litter from commercial and industrial premises and run-off from nitrogen rich fertilisers in the Park threaten the quality of the Park's soil and water.	National environmental standards as well as the Riparian Authorities' Local Plans and the London Plan include policies to minimise and manage waste and pollution. The implementation of the Park's Strategic Policies offers an opportunity to contribute positively and proactively to the management of waste and pollution in the Park.	Human Health Biodiversity, Flora and Fauna Air Quality Soil Quality Water Quality Material Assets

### 3 SEA Framework

- 3.1 The development of a set of SEA objectives is a recognised way in which the likely environmental effects of tested options can be described, analysed and compared, as part of Strategic Environmental Assessment. A set of 14 SEA objectives have been defined and consulted upon with the statutory consultees in 2017.
- 3.2 The SA framework that was used for the Lee Valley Park Development Framework provided a useful summary of the previous sustainability issues in the Park and was used as the starting point for the definition of the updated SEA Framework. Consideration was also given to the revised and updated review of plans, policies and programmes, baseline information and challenges and opportunities for the Park (as presented in **Chapter 2**) and amendments have been made to a number of the objectives to ensure that they are appropriate for the SEA of the new Strategic Policies. Specifically, the SEA focuses on environmental effects, in line with the SEA Regulations.
- 3.3 The SEA Framework used to assess the significant effects of the new Strategic Policies is presented in **Table 3.1**.

**Table 3.1: SEA Framework**

No	Strategic Environmental Assessment Objectives	SEA Regulations Environmental Issue(s)
1	To prepare and provide for population growth, which is likely to result in increased visitors to the Park.	Population Human Health
2	To maximise the financial potential of the Park's assets to safeguard their future management and enhancement.	Population Human Health Landscape Biodiversity Climate Change
3	To seek to protect and preserve soil quality and greenfield land by making a presumption in favour of brownfield development, except where there are clear and sustainable reasons not to do so.	Biodiversity, Flora and Fauna Landscape Air Quality Soil Quality Water Quality Material Assets
4	To improve facilities for non-motorised forms of transport within the Park to help link up open areas and clusters of services.	Human Health Air Quality
5	To protect existing transport infrastructure within the Park and balance this against the proper functioning of Park resources including recreation, nature conservation, open space and tranquillity.	Human Health Biodiversity, Flora and Fauna Cultural Heritage

No	Strategic Environmental Assessment Objectives	SEA Regulations Environmental Issue(s)
		Landscape Air Quality
6	To maintain and enhance landscape quality and visual amenity of the Park, taking full account of variations in landscape, townscape and waterscape character.	Landscape Human Health
7	To develop a range of venues and activities that appeal to all age groups.	Human Health Landscape Population
8	To protect and enhance priority species and existing habitats, including waterbodies and watercourses (including the riparian corridor), and to create new habitats to re-connect existing areas.	Biodiversity, Flora and Fauna Water Quality
9	To develop maintenance and management regimes, including local volunteer initiatives, that improve land management for nature conservation and as an educational resource.	Population Human Health Biodiversity, Flora and Fauna Landscape Water Quality
10	To maintain and enhance existing known heritage assets while seeking their full potential as visitor attractions or stimuli for regeneration.	Cultural Heritage
11	To minimise pollution to air and soil and water quality, improving quality where possible, to reduce the negative effects pollution on human health, biodiversity and cultural heritage assets.	Air Quality Soil Quality Water Quality
12	To reduce the risk of flooding to people and properties and promote the sustainable management of flood risk.	Human Health Climatic Factors Material Assets
13	To progressively manage and reduce contributions to climate change from all sources within the Park, and prepare for the effects of climate change on people and wildlife, including water scarcity and hotter summers.	Climatic Factors Human Health Biodiversity, Flora and Fauna Water Quality
14	To improve access and interconnectivity within and surrounding the Park, including improving the quality and character of key entrances to the Park.	Human Health Landscape Population Climatic Factors

No	Strategic Environmental Assessment Objectives	SEA Regulations Environmental Issue(s)
		Air Quality

## Use of the SEA Framework

- 3.4 The findings of the SEA of the new Strategic Policies are presented as a colour coded symbol showing the score for each option against each of the SEA Objectives along with a concise justification for the score given.
- 3.5 The use of colour coding will allow for likely significant effects (both positive and negative) to be easily identified, as shown in **Table 3.2** below.

**Table 3.2: Key to SEA scores**

++	Significant positive effect likely
+	Minor positive effect likely
0	Negligible effect likely
-	Minor negative effect likely
--	Significant negative effect likely
?	Likely effect uncertain
+/-	Mixed effect likely

- 3.6 The primary focus of the SEA is on the effects of the new Strategic Policies within and in the immediate vicinity of the Lee Valley Regional Park. However, indirect effects outside the Park are addressed in the assessment insofar as it is possible to do so.

## 4 SEA of Strategic Policies

- 4.1 This section describes the assessment findings for the Strategic Policies, to be included in the Park Development Framework. The Strategic Policies are presented in terms of the strategic planning aims to which they relate. This SEA has followed this structure by grouping assessments of the Strategic Policies by strategic planning aim.
- 4.2 Drawing on the evidence base and the spatial portrait, the strategic planning aims are designed to address the key challenges facing the Park, manage development pressures and realise opportunities to enhance the Park.
- 4.3 The strategic planning aims are:
- Ensure the effective use and management of land.
  - Conserve and enhance the Park's landscape character, key views and openness.
  - Conserve and enhance the cultural heritage of the Park and its historic environment.
  - Conserve and enhance the Park's biodiversity.
  - Protect, improve and make best use of the Park's water spaces.
  - Increase the attractiveness and use of the Parkland and venues to support the health and wellbeing of visitors from all communities.
  - Influence major new development within and adjacent to the Park to ensure that it is protected and enhanced.
  - Improve accessibility and entrances to the Park for pedestrians and cyclists and via public transport.
  - Protect and enhance the Park's contribution in reducing and managing flood risk.
- 4.4 The Strategic Policies and assessment of these is set out below.

**Table 4.1: Summary of effects generated by Strategic Policies E1-E2**

Ensure the effective use and management of land		
SEA Objective	E1	E2
SEA1: Population Growth	+	0
SEA2: Maximise financial potential	++	0
SEA3: Soil quality and greenfield land	++?	0
SEA4: Non-motorised transport	0	0
SEA5: Existing transport infrastructure	+	0
SEA6: Landscape and visual amenity	+	+
SEA7: Venues and activities	0	0
SEA8: Species and habitats	+	0

Ensure the effective use and management of land		
SEA9: Land management	+	0
SEA10: Heritage assets	0	+
SEA11: Air, water and soil quality	0	0
SEA12: Flood risk	0	0
SEA13: Climate change	0	0
SEA14: Interconnectivity	0	0

- 4.5 Policy E1 scores a minor positive effect in relation to SEA1 because natural capital accounting demonstrates the value of enhancing outdoor spaces and landscapes, and could therefore encourage the enhancement of natural features within the Lee Valley Regional Park. This could result in increased visitor numbers to the Park.
- 4.6 Although the nature of enhancements mentioned above are unknown, Policy E1 is also likely to improve the visual amenity of the Park with minor positive effects on SEA6. Policy E2 is also likely to have a minor positive effect in relation to SEA6 because preventing development that could adversely impact on the amenity of the Park, within or outside of its boundary, will help maintain the landscape quality and visual amenity of the Park.
- 4.7 Policy E1 is expected to have a significant positive effect in relation to SEA2 because it requires development proposals to take into consideration the economic value of the Park's natural features, as well as opportunities for making greater use of these assets, through the Natural Capital Accounting Framework. This is likely to maximise the financial potential of the Park's natural assets.
- 4.8 Policy E1 is expected to have a significant positive effect in relation to the 'most effective use of land and property' (SEA3) because it is expected to promote a brownfield-first approach, minimising land-take required for development. Such an approach will help to protect soil resources and greenfield land. However, this is uncertain as this is not set out explicitly in the policy.
- 4.9 Policy E1 is expected to have a minor positive effect in relation to SEA8 because the LVRPA is likely to support enhancements to the value of the environment in ways that can subsequently be reflected in natural capital accounts. These enhancements would help protect and enhance priority species and existing habitats within the Park.
- 4.10 Policy E1 is also expected to have more indirect and minor positive effects with regards to SEA5 and SEA9, as it will encourage decisions about land use to balance needs for infrastructure and development against fulfilling the statutory purpose of the Park.
- 4.11 Policy E2 scores a minor positive effect in relation to SEA10 because resisting development that could adversely impact on the Park's amenity, is likely to protect the setting of heritage assets within the area.

**Table 4.2: Summary of effects generated by Strategic Policies L1-L4**

Conserve and enhance the Park's landscape character, key views and openness
<b>L1:</b> Require all development proposals to demonstrate how their location, scale, design and materials respect and respond to the character, sensitivities and qualities of the relevant landscape character areas, as detailed in the Landscape Character Assessment (LCA).
<b>L2:</b> Secure designs of new buildings and other structures which are appropriate to their landscape context as identified in the Landscape Character Assessment.
<b>L3:</b> Require full landscape and visual assessments to be made of all proposals for tall buildings for sites both within and adjacent to the Park.
<b>L4:</b> Protect views that promote a sense of orientation and/or an appreciation of the natural and physical

Conserve and enhance the Park's landscape character, key views and openness				
environment of the Lee Valley.				
SEA Objective	L1	L2	L3	L4
SEA1: Population Growth	0	0	0	0
SEA2: Maximise financial potential	0	0	0	0
SEA3: Soil quality and greenfield land	0	0	0	0
SEA4: Non-motorised transport	0	0	0	0
SEA5: Existing transport infrastructure	0	0	0	0
SEA6: Landscape and visual amenity	++	+	+	+
SEA7: Venues and activities	0	0	0	0
SEA8: Species and habitats	0	0	0	0
SEA9: Land management	0	0	0	0
SEA10: Heritage assets	+	+	+	+
SEA11: Air, water and soil quality	0	0	0	0
SEA12: Flood risk	0	0	0	0
SEA13: Climate change	0	0	0	0
SEA14: Interconnectivity	0	0	0	0

- 4.12 All policies aim to conserve and enhance the quality of the landscape and visual amenity of the Park. Therefore, they all score positively against SEA6. Policy L1 scores a significant positive effect against SEA6 because it requires development proposals to respect and respond to the character, key sensitivities and qualities of the Park.
- 4.13 All of the policies will help protect the setting of the Park's historic environment, by conserving the landscape character and openness of the Park. This results in minor positive effects against SEA10.

**Table 4.3: Summary of effects generated by Strategic Policies H1-H3**

Conserve and enhance the cultural heritage of the Park and its historic environment				
<b>H1:</b> Conserve and enhance the Park's historic environment and cultural heritage, including its archaeology, historic buildings, structures, landscapes and their settings.				
SEA Objective	H1	H2	H3	
SEA1: Population Growth	0	+	+	
SEA2: Maximise financial potential	0	+	+	
SEA3: Soil quality and greenfield land	0	0	0	
SEA4: Non-motorised transport	0	?	0	
SEA5: Existing transport infrastructure	0	0	0	

Conserve and enhance the cultural heritage of the Park and its historic environment			
SEA6: Landscape and visual amenity	+	0	0
SEA7: Venues and activities	+	+	+
SEA8: Species and habitats	0	0	-?
SEA9: Land management	0	0	0
SEA10: Heritage assets	++	++	0
SEA11: Air, water and soil quality	0	0	-
SEA12: Flood risk	0	0	0
SEA13: Climate change	0	0	-
SEA14: Interconnectivity	0	0	0

- 4.15 Policies H2 and H3 scored a minor positive effect against SEA1 because both are likely to result in an increase in the numbers of visitors to the Park. This will be achieved through the enhancement of heritage assets and associated opportunities for leisure, health and recreation, as well as the support proposed by Policy H2 for art, festivals and fairs. Furthermore, enhancing heritage assets and introducing a variety of events to the Park is likely to maximise the Park's financial potential, with minor positive effects against SEA2.
- 4.16 Proposals to enhance access to heritage assets will be supported by Policy H2. However, the policy does not explicitly state whether these enhancements must promote non-motorised forms of transport. An uncertain effect is therefore likely against SEA4.
- 4.17 Policies H1, H2 and H3 are likely to have a positive effect on SEA7 because they all support the creation of new and improved venues for a variety of activities that appeal to all age groups.
- 4.18 Supporting art, festivals and fairs is likely to bring a larger number of visitors to the Park, which may have adverse effects on the Park's protected habitats and species, although this is uncertain until the location and scale of the events are known (SEA8). In addition, Policy H3 also scores a minor adverse effect against SEA11 and SEA 13 because it is likely to encourage additional visitors to the Park, a proportion of which are likely to drive to the Park, increasing emissions of air pollutants and greenhouse gases.
- 4.19 Policies H1 and H2 will have a significant positive effect on SEA10 because they both seek to maintain and enhance existing heritage assets. Policy H1 scored a minor positive effect in relation to SEA6 because it seeks to maintain and enhance the Park's landscape.

**Table 4.4: Summary of effects generated by Strategic Policies B1-B4**

Conserve and enhance the Park's biodiversity				
SEA Objective	B1	B2	B3	B4
SEA1: Population Growth	0	0	0	0

Conserve and enhance the Park's biodiversity				
SEA2: Maximise financial potential	0	0	0	0
SEA3: Soil quality and greenfield land	0	0	0	0
SEA4: Non-motorised transport	0	0	0	0
SEA5: Existing transport infrastructure	0	0	0	0
SEA6: Landscape and visual amenity	0	0	0	0
SEA7: Venues and activities	0	0	0	0
SEA8: Species and habitats	++	+?	+?	++
SEA9: Land management	0	0	0	0
SEA10: Heritage assets	0	0	0	0
SEA11: Air, water and soil quality	+	0	0	+
SEA12: Flood risk	0	0	0	0
SEA13: Climate change	0	0	0	0
SEA14: Interconnectivity	0	0	0	0

- 4.21 All of the policies aim to protect and enhance existing habitats and species within the Park. Policies B1 and B4 scored a significant positive effect against SEA8 whereas Policies B2 and B3 scored a minor positive but uncertain effect. This is because Policies B2 and B3 seek to offset any adverse effects on biodiversity as a result of development. Policy B2 aims to achieve this through planning obligations that deliver the 'mitigation hierarchy' whereas Policy B3 aims to achieve this through 'biodiversity offsetting', resulting from major development schemes proposed for sites outside the Park. However, the policies do not state whether biodiversity offsets must be equal to that which is being lost. Therefore, this effect is uncertain.
- 4.22 Policies B1 and B4 score a minor positive effect against SEA11 because they aim to protect habitats within the Park, including aquatic habitats. As the HRA suggests, this is likely to improve water quality within the area.

**Table 4.5: Summary of effects generated by Strategic Policies W1-W3**

Protect, improve and make best use of the Park's water spaces				
SEA Objective	W1	W2	W3	
SEA1: Population Growth	+	+	0	
SEA2: Maximise financial potential	0	0	0	
SEA3: Soil quality and greenfield land	0	0	0	
SEA4: Non-motorised transport	0	0	0	
SEA5: Existing transport infrastructure	0	0	0	
SEA6: Landscape and visual amenity	+	0	+	

Protect, improve and make best use of the Park's water spaces			
SEA7: Venues and activities	0	0	0
SEA8: Species and habitats	+/-?	-?	++
SEA9: Land management	0	0	0
SEA10: Heritage assets	0	0	0
SEA11: Air, water and soil quality	+/-?	-?	++
SEA12: Flood risk	0	0	0
SEA13: Climate change	0	0	0
SEA14: Interconnectivity	0	0	0

- 4.24 Policies W1 and W2 may enhance water-based recreation at the Park, therefore providing more recreational opportunities for a growing population and growing number of visitors (SEA1). In protecting the Park's waterbodies, Policy W1 as well as Policy W3 may contribute to protecting landscape and waterscape character, resulting in minor positive effects on SEA6.
- 4.25 Whilst Policy W1 supports protection of biodiversity, increasing water-based recreation under Policies W1 and W2 could lead to degradation of the quality and biodiversity of water bodies in the Park. This could be through physical disturbance, increased noise or light, pollution from accidental spillages, fuel leakage or emissions from boat engines, or introduction of invasive species, carried on equipment for water-based recreation. This has led to minor positive and negative mixed effects on SEA8 and SEA11 for W1 and minor negative effects for W2. However, these effects are uncertain as Policy W1 requires the Park's biodiversity to be protected and Policy W2 states that recreational uses must be in line with other strategic policies, such as those seeking to protect biodiversity.
- 4.26 Policy W3 scored a significant positive effect in relation to SEA8 and SEA11 because it seeks to protect and enhance existing water bodies, in accordance with the Thames River Basin Management Plan.

**Table 4.6: Summary of effects generated by Strategic Policies V1-V4**

Increase the attractiveness and use of the parkland and venues to support the health and wellbeing of visitors from all communities				
SEA Objective	V1	V2	V3	V4
SEA1: Population Growth	+	+	+	+
SEA2: Maximise financial potential	0	++	+	+
SEA3: Soil quality and greenfield land	0	0	0	?
SEA4: Non-motorised transport	0	0	0	0
SEA5: Existing transport infrastructure	0	0	0	0

**Increase the attractiveness and use of the parkland and venues to support the health and wellbeing of visitors from all communities**

SEA6: Landscape and visual amenity	?	0	+?	?
SEA7: Venues and activities	+?	+	+	+
SEA8: Species and habitats	+?/-?	-?	+?/-?	+?/-?
SEA9: Land management	0	0	0	0
SEA10: Heritage assets	?	0	?	?
SEA11: Air, water and soil quality	?	--	?	-
SEA12: Flood risk	?	0	?	?
SEA13: Climate change	?	--	?	-
SEA14: Interconnectivity	0	0	0	++

- 4.27 All policies aim to enhance and expand the visitor offer of the Park, therefore increasing the number and range of activities for visitors, which may help provide for a growing population (SEA1). This may also provide opportunities for maximising the financial potential of the Park, through opportunities to provide more paid activities. In particular, developing an event programme of national and international status (Policy V2) is likely to attract many visitors and therefore provide a significant source of income for the Park (SEA2).
- 4.28 The effect of new visitor/education facilities and visitor hubs on soil quality and greenfield land depends on where these are to be located, resulting in uncertain effects for Policy V4 on SEA3. Policies V1, V3 and V4 could lead to additional development within the Park. Without further information on the location, design and layout of such development, it is not possible to say whether this would have an effect on landscape and visual amenity (SEA6), heritage assets (SEA10) and flooding (SEA12) and if so, what this effect would be. Policy V3 does, however, encourage venue development that is 'sympathetic to the wide parklands' and is therefore likely to result in a minor positive but uncertain effect in relation to SEA6.
- 4.29 This set of policies aims to improve and expand the visitor offer of the Park, therefore work towards achieving SEA7: to develop a range of venues and activities that appeal to all age groups. As such, a minor positive effect is recorded against all policies. This is uncertain for Policy V1, as 'Park related uses' could relate to nature conservation purposes, rather than visitor entertainment and recreation. For this reason, the effects of Policy V1 on SEA8: Species and habitats could be positive or negative and are also uncertain. Policies V2, V3 and V4 could have potentially negative effects on SEA8 as they may encourage additional visitors to the Park. The HRA suggests that Policy V2 could have significant negative effects on SEA8 in-combination with other strategic policies. However, Policies V3 and V4 may encourage visitors to different areas of the Park, therefore 'spreading out' the negative effects of recreation pressure. However, without further details or promoted routes or locations, it is unknown whether this would reduce or increase visitor pressure in sensitive locations. Regardless, the HRA concludes that these negative effects would be offset by the benefits brought by Policies A1-A6, D1-D4 and B1-B4 with regard to the protection and enhancement of priority species and existing habitats.
- 4.30 Policies V2 and V4 are likely to attract more visitors to the Park. Policies V1 and V3 may also bring additional visitors to the Park, but this is less certain. Attracting additional visitors may lead to increases in air pollution (SEA11) and greenhouse gas emissions (SEA13) due to emissions from them driving to the Park. This is likely to be significant for Policy V2, as holding events of national and international status is likely to attract numerous visitors, many of whom may not be local and may travel long distances to attend such events.
- 4.31 Policy V4 encourages connectivity to the Park through new entrance points and is therefore expected to have significant positive effects on SEA14: Interconnectivity.

**Table 4.7: Summary of effects generated by Strategic Policies D1-D4**

<b>Influence major new development within and adjacent to the Park to ensure that it is protected and enhanced</b>				
<b>SEA Objective</b>	<b>D1</b>	<b>D2</b>	<b>D3</b>	<b>D4</b>
SEA1: Population Growth	0	0	0	+
SEA2: Maximise financial potential	0	0	+	+
SEA3: Soil quality and greenfield land	?	0	?	+?
SEA4: Non-motorised transport	0	0	0	0
SEA5: Existing transport infrastructure	0	0	0	0
SEA6: Landscape and visual amenity	+	0	+	+?
SEA7: Venues and activities	0	0	0	+?
SEA8: Species and habitats	+	0	+/-	+?
SEA9: Land management	0	0	0	+?
SEA10: Heritage assets	?	0	?	+?
SEA11: Air, water and soil quality	0	0	0	+?
SEA12: Flood risk	?	0	?	0
SEA13: Climate change	0	+	0	+?
SEA14: Interconnectivity	0	0	0	0

- 4.33 Policy D4 is expected to help the Park prepare and provide for the increased number of visitors as a result of population growth (SEA1), maximising its financial potential (SEA2). This is due to the fact Policy D4 designates sites within the Park to offset the adverse impacts of new development on the Epping Forest SAC. Policy D4 has the potential to generate positive effects against all remaining SEA objectives (with the exceptions of SEA4, SEA5, SEA12 and SEA14) by enhancing the natural assets within the Park, limiting the amount of built development within the Park and conserving the Park's landscape, heritage assets, and priority species and habitats. However, the significance of these positive effects is uncertain.
- 4.34 Policy D3 supports development that enhances the Park, which could be a source of income for the Park; therefore, Policy D3 has a positive effect on SEA2: maximise financial potential.
- 4.35 Although policies D1 and D3 do not proactively pursue development within the Park, they commit to working in partnership with riparian councils to ensure that the nature of new development on sites both within and adjacent to the Park meets development aspirations. Such development has

the potential to affect soil and greenfield land (SEA3), heritage assets (SEA10) and flooding (SEA12), but the actual effects will be dependent on the location, design and layout of development, therefore uncertainty is recorded against all of these objectives. However, in protecting open land around the Park and providing open space within the Park to cater for the recreational needs, both policies are likely to contribute to maintaining landscape quality and visual amenity of the Park, therefore having positive effects on SEA6.

- 4.36 Open, greenfield land around the Park is expected to support biodiversity, therefore Policy D1 is identified as having positive effects on SEA8. Policy D3 is likely to have a mixed minor positive and minor negative effect on SEA8. The provision of open space to cater for recreational needs could help support biodiversity. However, more open spaces could attract more visitors to the park for recreational purposes, with adverse effects on biodiversity.
- 4.37 Policy D2 scores a minor positive effect in relation to SEA13 because development with high environmental standards is likely to reduce contributions to climate change and help prepare for the effects of climate change through energy efficient design.

**Table 4.8: Summary of effects generated by Strategic Policies A1-A6**

<b>Improve accessibility and entrances to the Park for pedestrians and cyclists and via public transport</b>						
<b>SEA Objective</b>	<b>A1</b>	<b>A2</b>	<b>A3</b>	<b>A4</b>	<b>A5</b>	<b>A6</b>
SEA1: Population Growth	0	0	0	0	0	0
SEA2: Maximise financial potential	0	0	0	0	0	0
SEA3: Soil quality and greenfield land	0	0	0	0	0	0
SEA4: Non-motorised transport	+	++	++	++	++	+
SEA5: Existing transport infrastructure	0	0	0	0	0	0
SEA6: Landscape and visual amenity	+?	0	+?	0	0	0
SEA7: Venues and activities	0	0	0	0	0	0
SEA8: Species and habitats	-?	+?/-?	+/-?	-?	-?	-?
SEA9: Land management	0	0	0	0	0	0
SEA10: Heritage assets	0	0	0	0	0	0
SEA11: Air, water and soil quality	-	0	-	0	-	0
SEA12: Flood risk	0	0	0	0	0	0
SEA13: Climate change	-	0	-	0	-	0
SEA14: Interconnectivity	++	++	++	++	++	++

- 4.39 Policies A2, A3, A4 and A5 are likely to improve facilities for walking and cycling within the Park and help link-up open spaces and clusters of services; therefore, significant positive effects are recorded on SEA4.
- 4.40 Policy A1 aims to create new and improved entrance points into the Park, facilitating accessibility to the Park via a range of transport modes, including non-motorised forms; therefore, a minor positive effect is recorded on SEA4. Likewise, Policy A6 aims to respond to the various needs of the community with regard to accessibility, also with minor positive effects recorded against SEA4.
- 4.41 Whilst Policy A1 does not specify what 'enhancing' entrances to the Park would involve, this may include making them more attractive, therefore having minor positive effects on visual amenity (SEA6). Policy A3 may also have a minor positive effect on SEA6, as the creation of new and improved green corridors may enhance landscape and visual amenity.
- 4.42 All policies have potential to result in negative effects on biodiversity (SEA8). This is due to the fact that these policies are expected to facilitate movement through and accommodate an increase in the number of visitors to the Park. Policies A2 and A3 in particular may encourage visitors to access more remote parts of the Park. This could have positive effects on biodiversity by 'spreading out' recreational impacts or it could have negative effects by improving access to more sensitive parts of the Park. Minor positive effects are also expected in that these policies will achieve a gradual change in the way in which visitors reach the Park, with an increase in the proportion of those pursuing the more sustainable options of walking, cycling or public transport.
- 4.43 Policies A1, A3 and A5 are likely to encourage additional visitors to the Park by improving access to the Park itself. Many visitors are likely to drive to the Park, therefore these policies are likely to increase emissions of air pollutants and greenhouse gases from traffic and transport, resulting in minor negative effects against SEA11 and SEA13.
- 4.44 All policies are likely to have significant positive effects for SEA14, as all will improve access to and connectivity within the Park.

**Table 4.9: Summary of effects generated by Strategic Policies FR1-FR3**

<b>Protect and enhance the Park's contribution in reducing and managing flood risk</b>			
<b>SEA Objective</b>	<b>FR1</b>	<b>FR2</b>	<b>FR3</b>
SEA1: Population Growth	0	0	0
SEA2: Maximise financial potential	0	0	0
SEA3: Soil quality and greenfield land	0	0	0
SEA4: Non-motorised transport	0	0	+
SEA5: Existing transport infrastructure	0	0	0
SEA6: Landscape and visual amenity	0	0	+
SEA7: Venues and activities	0	0	0
SEA8: Species and habitats	0	0	+
SEA9: Land management	0	0	0
SEA10: Heritage assets	0	0	+

Protect and enhance the Park's contribution in reducing and managing flood risk			
SEA11: Air, water and soil quality	0	0	+
SEA12: Flood risk	++	++	+
SEA13: Climate change	0	0	+
SEA14: Interconnectivity	0	0	+

- 4.46 Policies FR1 and FR2 score a significant positive effect in relation to SEA12 because they both aim to reduce flood risk. Policy FR1 aims to reduce flood risk through the protection of the Lee Flood Relief Channel, whilst Policy FR2 aims to reduce flood risk through natural flood management, sustainable drainage measures and the installation of SUDs.
- 4.47 Policy FR3 promotes the development of green infrastructure and connections between green spaces. Policy FR3 is therefore likely to improve the use of non-motorised forms of transport within the Park through the development of such things as linear parks, which will also improve interconnectivity within the Park. A minor positive effect is therefore likely against SEA4 and SEA14.
- 4.48 Policy FR3 scores a minor positive effect in relation to SEA6, SEA8 and SEA10 because the development of green infrastructure has the ability to enhance existing habitats within the Park, at the same time as improving landscape quality and visual amenity, as well as the setting of heritage assets. A positive effect is also likely in relation to SEA11 because green infrastructure includes aquatic habitats.
- 4.49 Lastly, green infrastructure can help mitigate flood risk at the same time as reducing contributions to climate change through the absorption of greenhouse gases, specifically carbon dioxide. Minor positive effects are therefore likely against SEA12 and SEA13.

## Cumulative effects

- 4.50 **Table 4.10** illustrates all of the effects generated by the Strategic Policies against the SEA objectives, with a view to highlighting their likely cumulative effects.
- 4.51 In-combination, the Strategic Policies have the potential to generate **significant positive (++)** effects against the following SEA objectives:
- **SEA1:** Population growth – the policies work together to improve the Park's accessibility, functionality and facilities and services, which will help the Park to meet the needs of a growing population.
  - **SEA2:** Maximise financial potential – the policies work together to improve the Park's visitor offer and maximise the income generated by new development which will benefit from being within or in close proximity to the Park.
  - **SEA3:** Soil quality and greenfield land – the policies work together to safeguard the Park's most sensitive assets and open locations, prioritising the development of previously development and lower quality land. Although, overall, this effect is **uncertain (?)** due to the fact that new development within the Park has the potential to be located on greenfield land, including areas of good soil quality.
  - **SEA4:** Non-motorised transport – the policies work together to improve accessibility and connectivity throughout the Park, making it easier to walk and cycle through and within it.
  - **SEA6:** Landscape and visual amenity – the policies work together to safeguard and enhance the Park's landscape character and sensitivities, including its openness and tranquillity. Although, overall, this effect is **uncertain (?)** due to the fact that a significant increase to the number of visitors to the Park and new development within the Park has the potential to be located in areas of particular landscape sensitivity.

- **SEA7:** Venues and activities – the policies work together to create new and improved venues and facilities for activities that appeal to all ages, including formal and informal recreation, education and leisure.
- **SEA8:** Species and habitats – the policies work together to conserve and connect the Park's designated and recognised ecological habitats and priority species. However, the significance of these positive effects is dependent on the scale, location, design and landscaping of the developments and associated initiatives that enable such improvements. Therefore, overall, this effect is recorded as **uncertain (?)**.
- **SEA10:** Heritage assets – the policies work together to safeguard and enhance the Park's historic environment, as well as improve accessibility and interpretation of it. Although, overall, this effect is **uncertain (?)** due to the fact that a significant increase to the number of visitors to the Park and new development within the Park has the potential to be located in areas of particular historic sensitivity.
- **SEA14:** Interconnectivity – the policies work together to create new and improved entrances to the Park, improving accessibility and interconnectivity throughout the Park.

4.52 In-combination, the Strategic Policies have the potential to generate **significant negative (--)** effects against the following SEA objectives:

- **SEA8:** Species and habitats – the policies work together to encourage more visitors to the Park, including more remote parts of the Park. This could have positive effects on biodiversity by 'spreading out' recreational impacts or it could have negative effects by improving access to more sensitive parts of the Park. The HRA suggests that all policies could have significant negative effects on SEA8 in-combination. Without further details, such as promoted routes or locations, it is unknown whether this would reduce or increase visitor pressure in sensitive locations. Regardless, the HRA concludes that these negative effects would be offset by the benefits brought by Policies A1-A6, D1-D4 and B1-B4 with regard to the protection and enhancement of priority species and existing habitats. Furthermore, a mitigation strategy is currently being prepared by the surrounding local authorities for Epping Forest SAC and Natural England's proposed interim advice seeks to provide alternative recreational space within a specified zone of influence from Epping Forest SAC. This will provide alternative green space for residents as part of development in districts and boroughs that lie within the 6.2km zone of influence. Additionally, the Mitigation Strategy seeks to develop a package of mitigation to address in-combination air quality impacts at Epping Forest SAC. There is **uncertainty (?)** associated with the potential location of new development within and in close proximity to the Park.
- **SEA11:** Air, water and soil quality – the policies work together to encourage more visitors to the Park. Attracting additional visitors may lead to significant increases in air pollution generated by vehicles travelling to and from the Park's venues and facilities. Furthermore, increased recreation activity in the Park's water bodies and watercourses has the potential to adverse effect water quality.
- **SEA13:** Climate change – the policies work together to encourage more visitors to the Park, including the Park's internationally and nationally recognised venues. Attracting additional visitors may lead to significant increases in greenhouse gas emissions generated by travelling long distances to and from the Park's venues and facilities.

**Table 4.10: Overview of Strategic Policies effects**

Strategic Policies / SEA Objectives	E1	E2	L1	L2	L3	L4	H1	H2	H3	B1	B2	B3	B4	W1	W2	W3	V1	V2	V3	V4	D1	D2	D3	D4	A1	A2	A3	A4	A5	A6	FR1	FR2	FR3
SEA1: Population Growth	+	0	0	0	0	0	0	+	+	0	0	0	0	+	+	0	+	+	+	0	0	0	+	0	0	0	0	0	0	0	0		
SEA2: Maximise financial potential	++	0	0	0	0	0	0	+	+	0	0	0	0	0	0	0	+	+	+	0	0	+	+	0	0	0	0	0	0	0			
SEA3: Soil quality and greenfield land	++?	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	?	0	?	+	?	0	0	0	0	0	0	0			
SEA4: Non-motorised transport	0	0	0	0	0	0	0	?	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	+	+	+	+	+	+	+			
SEA5: Existing transport infrastructure	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0				
SEA6: Landscape and visual amenity	+	+	++	+	+	+	+	+	0	0	0	0	0	+	0	+	?	0	+	?	+	0	+	+	?	0	0	0	0	+			
SEA7: Venues and activities	0	0	0	0	0	0	0	+	+	0	0	0	0	0	+	?	+	+	+	0	0	0	+	?	0	0	0	0	0	0			
SEA8: Species and habitats	+	0	0	0	0	0	0	0	-?	+	+	+	+	+/-?	-?	+	+/?/-?	-?	+/?/-?	+/?/-?	+	0	+/-?	+/?/-?	-?	+/?/-?	-?	-?	-?	0	0		
SEA9: Land management	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	?	0	0	0	0	0				
SEA10: Heritage assets	0	+	+	+	+	+	+	+	+	0	0	0	0	0	0	0	?	0	?	?	?	0	?	+	?	0	0	0	0	0	+		
SEA11: Air, water and soil quality	0	0	0	0	0	0	0	0	-	+	0	0	+	+/-?	-?	+	?	--	?	-	0	0	0	+	?	-	0	-	0	0	+		
SEA12: Flood risk	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	?	0	?	?	?	0	?	0	0	0	0	0	+	+	+		
SEA13: Climate change	0	0	0	0	0	0	0	0	0	-	0	0	0	0	0	0	?	--	?	-	0	+	0	+	?	-	0	-	0	0	+		
SEA14: Interconnectivity	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	+	0	0	0	0	+	+	+	+	+	0	0		

## Mitigation and Enhancement

- 4.53 It is important to recognise that the significant positive and negative effects likely to be generated by the Strategic Policies will not be created in a vacuum; such effects will mix with other influences, including the effects generated by the other components of the Park Development Framework. Notable components of the PDF include its Vision, Strategic Aims and Principles, Thematic and Area Proposals. The definition and delivery of the Park's Area Proposals offers the opportunity to avoid particularly sensitive areas of the Park and mitigate the adverse effects identified in this SEA of the Strategic Policies through the definition of area-based mitigation and enhancement measures. In addition, the implementation of the Strategic Policies and their associated effects are reliant on the strategic, site allocation and development management policies within the Local Plans of the riparian authorities as well as regional and national policy, such as the London Plan and the National Planning Policy Framework.

## Monitoring

- 4.54 The SEA Regulations require that '*the responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action*' and that the environmental report should provide information on '*a description of the measures envisaged concerning monitoring*'.
- 4.55 Although National Planning Practice Guidance states that monitoring should be focused on the significant environmental effects, the reasons for this is to identify unforeseen adverse effects at an early stage and to enable appropriate remedial actions. Since effects that the SEA expects to be minor may become significant and vice versa, monitoring measures have been proposed in this SEA Report in relation to all of the SEA objectives. If and when the likely significant effects become more certain, the LVRPA may wish to narrow down the monitoring framework to focus on those effects likely to be significantly adverse.
- 4.56 **Table 4.11** sets out a number of suggested indicators for monitoring the potential environmental effects of implementing the Strategic Policies. The data used for monitoring in many cases will be provided by outside bodies, for example the Environment Agency. It is therefore recommended that the LVRPA remains in dialogue with statutory environmental consultees and other stakeholders and works with them to agree the relevant sustainability effects to be monitored and to obtain information that is appropriate, up to date and reliable.

**Table 4.11: Proposed monitoring framework for the Strategic Policies**

SEA objectives	Proposed monitoring indicators
SEA1: Population Growth	Change in annual number of visits to the Park.
SEA2: Maximise financial potential	Change in annual income across the Park. Change in annual income for individual attractions/venues in the Park.
SEA3: Soil quality and greenfield land	Number of developments wholly or mostly on greenfield land per year. Availability of brownfield land for redevelopment.
SEA4: Non-motorised transport	Change in patterns of bicycle hire within the Park. Change in the number of footpaths and cycleways within the Park.
SEA5: Existing transport infrastructure	Loss of transport infrastructure within the Park.
SEA6: Landscape and visual amenity	Number of developments permitted contrary to Landscape Character Assessment 'sensitivities to change'. Development on previously developed land or conversion of

<b>SEA objectives</b>	<b>Proposed monitoring indicators</b>
	existing buildings.
SEA7: Venues and activities	Number and range of venues within the Park. Social/economic profile of people using venues within the Park.
SEA8: Species and habitats	Number, area, quality and condition of designated wildlife conservation sites within and near to the Park. Number of developments resulting in biodiversity loss. Number of developments resulting in biodiversity net gain. Population numbers and extent of protected and priority species within the Park. Area of protected and priority habitats within the Park.
SEA9: Land management	Area of land actively managed for nature conservation. Number and magnitude of local volunteer initiatives. Number of school and/or corporate visits.
SEA10: Heritage assets	Number and % of heritage assets at risk. Number of heritage assets restored and brought back into use. Number of major development projects that enhance the significance of heritage assets or historic landscape character. Number of major development projects that detract from the significance of heritage assets or historic landscape character. Improvements in the management of historic and archaeological sites and features. % change in visits to historic sites. % of planning applications or activities where archaeological investigations were required prior to approval. % of planning applications or activities where archaeological mitigation strategies (were developed and implemented).
SEA11: Air, water and soil quality	Percentage of water bodies at good ecological status or potential. Percentage of water bodies assessed at good or high biological status. Percentage of water bodies assessed at good chemical status. Number of water or soil pollution incidents. Change in area of contaminated land that has been remediated. Change in area of land where soil has been degraded by contamination. NO <sub>2</sub> emissions PM10 emissions Number of visitors arriving at the Park by car or other private vehicle.
SEA12: Flood risk	Spatial extent of flood zones 2 and 3 Planning permission in identified flood zones granted permission contrary to advice from the Environment Agency Incidents of flooding and location Incidents of flood warnings in the Park Spatial extent of areas susceptible to surface water flooding

<b>SEA objectives</b>	<b>Proposed monitoring indicators</b>
	Number or % of permitted developments incorporating SuDS
SEA13: Climate change	Carbon Dioxide emissions. Energy consumption of venues within the Park. Percentage of energy supplied from renewable sources. Number of visitors arriving at the Park by car or other private vehicle.
SEA14: Interconnectivity	Annual number of visitors. Average distance visitors travel to the Park. Average number of destinations within the Park visited per visit.

## 5 Conclusion

- 5.1 This SEA Report was prepared to accompany consultation on the draft Strategic Policies to be included within the Lee Valley Regional Park 'Park Development Framework' (PDF). This SEA Report was approved by the Committee in January 2019, subject to various minor changes which have been reflected in this final SEA report. The SEA has sought to identify significant effects emerging from Strategic Policies in line with the SEA Regulations.
- 5.2 It is important to recognise that the significant positive and negative effects likely to be generated by the Strategic Policies will not be created in a vacuum. Such effects will mix with other influences – policy mechanisms, external growth pressures and national, regional and local initiatives – that will work together and in opposition to mitigate and enhance the effects identified above.
- 5.3 Significant population growth within the riparian authorities and the associated intensification and densification of development around the Park, will increase the likelihood of significant adverse effects against the environmental SEA objectives, notably SEA6, SEA8, SEA10, SEA11, SEA12 and SEA13. However, the Park's Strategic Policies will mitigate these effects and enhance the Park's natural and historic assets for everyone to enjoy. Furthermore, the Park's Strategic Policies aim to secure new funding streams to proactively manage development within and around the Park, enabling the delivery of new and improved venues, services and facilities, as well as strategic initiatives that conserve and connect the Park's most sensitive and special qualities.
- 5.4 Significant positive effects are likely to be generated against SEA objectives SEA1, SEA2, SEA3, SEA4, SEA6, SEA7, SEA8, SEA10 and SEA14.

LUC

April 2019

# **Appendix 1**

## Review of Relevant Plans, Policies and Programmes

**Table A1: Relevant International and National Plans, Policies and Programmes**

Plan/ Policy/ Programme	Objectives and Requirements	Implications for the Strategic Assessment
<b>International</b>		
The Ramsar Convention (1971)	The Ramsar Convention provides a framework for national action and international cooperation for the conservation of and wise use of wetlands and their resources.	Consider the implications of strategic policies on wetland habitats.
Johannesburg Declaration on Sustainable Development (2002)	<p>Commitment to building a humane, equitable and caring global society aware of the need for human dignity for all.</p> <p>Renewable energy and energy efficiency. Accelerate shift towards sustainable consumption and production.</p>	Consider the enhancement of the natural environment.
Aarhus Convention (1998)	<p>Established a number of rights of the public with regard to the environment. Local authorities should provide for:</p> <ul style="list-style-type: none"> <li>• The right of everyone to receive environmental information</li> <li>• The right to participate from an early stage in environmental decision making</li> <li>• The right to challenge in a court of law public decisions that have been made without respecting the two rights above or environmental law in general.</li> </ul>	Ensure that the public are involved and consulted at all relevant stages of the SEA.
The Paris Agreement (2016)	Aims to strengthen the global response to the threat of climate change by keeping a global temperature rise this century well below 2 degrees Celsius above pre-industrial levels and to pursue efforts to limit the temperature increase even further to 1.5 degrees Celsius. Each country determines plans and regularly reports its own contribution it should make in order to mitigate global warming.	Consider the implications of the Strategic Policies for greenhouse gas emissions and climate change.
Habitat III agenda (2016)	United Nations conference that aimed to reinvigorate the global political commitment to the sustainable development of towns, cities and other human settlements, both rural and urban. The primary outcome of the conference was the 'New Urban Agenda', an urbanization model that sets fresh priorities and strategies that take into account the evolving patterns of the new century. A number of principles are set out, namely ending poverty, creating sustainable and inclusive economics and promoting environmental sustainability (see Para 14 of New Urban Agenda for more detail). <sup>11</sup>	Consider implications of strategic policies for sustainable principles as set out in New Urban Agenda.
Unesco World Heritage Convention	A series of operational guidelines adopted by the UNESCO World Heritage	Consider implications of the

<sup>11</sup> <http://habitat3.org/wp-content/uploads/Habitat-III-New-Urban-Agenda-10-September-2016.pdf>

Plan/ Policy/ Programme	Objectives and Requirements	Implications for the Strategic Assessment
	<p>Committee. The aim of the convention and guidelines is to safeguard heritage of universal value for future generations.</p> <p>States that are parties to the Convention agree to identify, protect, conserve, and present World Heritage properties. States recognise that the identification and safeguarding of heritage located in their territory is primarily their responsibility. They agree to do all they can with their own resources to protect their World Heritage properties.</p> <ul style="list-style-type: none"> <li>• 'adopt a general policy that aims to give the cultural and natural heritage a function in the life of the community and to integrate the protection of that heritage into comprehensive planning programs'</li> <li>• undertake 'appropriate legal, scientific, technical, administrative and financial measures necessary for the identification, protection, conservation, presentation and rehabilitation of this heritage'</li> <li>• refrain from 'any deliberate measures which might damage, directly or indirectly, the cultural and natural heritage' of other Parties to the Convention, and to help other Parties in the identification and protection of their properties.</li> </ul>	strategic policies for the principles of the Unesco World Heritage Convention.
<b>European</b>		
<i>SEA Directive 2001</i> Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment	Provide for a high level of protection of the environment and contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development.	Ensure the SEA is in broad conformity with the Directive.
<i>The Birds Directive 2009</i> Directive 2009/147/EC is a codified version of Directive 79/409/EEC as amended	The preservation, maintenance, and re-establishment of biotopes and habitats shall include the following measures: <ul style="list-style-type: none"> <li>• Creation of protected areas.</li> <li>• Upkeep and management in accordance with the ecological needs of habitats inside and outside the protected zones.</li> <li>• Re-establishment of destroyed biotopes.</li> <li>• Creation of biotopes.</li> </ul>	Consider implications of the Strategic Policies for birds.
<i>The Waste Framework Directive 2008</i> Directive 2008/98/EC on waste	Prevention or reduction of waste production and its harmfulness. The recovery of waste by means of recycling, re-use or reclamation. Recovery or disposal of waste without endangering human health and without using processes that could harm	Consider minimising waste production as well as promoting recycling.

<b>Plan/ Policy/ Programme</b>	<b>Objectives and Requirements</b>	<b>Implications for the Strategic Assessment</b>
	the environment.	
<i>The Air Quality Directive 2008</i> Directive 2008/50/EC on ambient air quality and cleaner air for Europe	Avoid, prevent and reduce harmful effects of ambient air pollution on human health and the environment	Consider implications of the Strategic Policies on maintaining and enhancing air quality through green infrastructure and the accessibility of the Park's visitor and sporting venues.
<i>The Landfill Directive 1999</i> Directive 99/31/EC on the landfill of waste	Prevent or reduce negative effects on the environment from the landfilling of waste by introducing stringent technical requirements for waste and landfills.	Consider increasing recycling and reducing the amount of waste.
<i>The Habitats Directive 1992</i> Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora	Promote the maintenance of biodiversity taking account of economic, social, cultural and regional requirements. Conservation of natural habitats and maintain landscape features of importance to wildlife and fauna.	Consider implications of the Strategic Policies for European Ecological Designations. Ensure the SEA is in broad conformity with the Directive.
European Spatial Development Perspective (1999)	Economic and social cohesion across the community. Conservation of natural resources and cultural heritage. Balanced competitiveness between different tiers of government.	Consider the conservation of natural resources and cultural heritage. How to safeguard these resources and make them available for local communities and visitors as part of the leisure resource.
EU Seventh Environmental Action Plan (2002-2012)	The EU's objectives in implementing the programme are: (a) to protect, conserve and enhance the Union's natural capital; (b) to turn the Union into a resource-efficient, green and competitive low-carbon economy; (c) to safeguard the Union's citizens from environment-related pressures and risks to health and wellbeing; (d) to maximise the benefits of the Union's environment legislation; (e) to improve the evidence base for environment policy; (f) to secure investment for environment and climate policy and get the prices	Consider the protection and enhancement of the natural environment and promote energy efficiency, where relevant.

Plan/ Policy/ Programme	Objectives and Requirements	Implications for the Strategic Assessment
	<p>right;</p> <p>(g) to improve environmental integration and policy coherence;</p> <p>(h) to enhance the sustainability of the Union's cities;</p> <p>(i) to increase the Union's effectiveness in confronting regional and global environmental challenges.</p>	
<p>European Convention on the Protection of the Archaeological Heritage (Valletta, 1992)</p> <p><i>Revision of the 1985 Granada Convention</i></p>	<p>Protection of the archaeological heritage, including any physical evidence of the human past that can be investigated archaeologically both on land and underwater.</p> <p>Creation of archaeological reserves and conservation of excavated sites.</p>	<p>Consider the protection of archaeological heritage.</p>
Water Framework Directive (2000)	<p>Commits EU member states to achieve 'good' qualitative and quantitative status of all water bodies (including marine waters up to one nautical mile from shore) by 2015. Ecological and chemical status of surface waters are assessed according to the following criteria:</p> <ul style="list-style-type: none"> <li>• Biological quality (fish, benthic invertebrates, aquatic flora)</li> <li>• Hydromorphological quality such as river bank structure, river continuity or substrate of the river bed</li> <li>• Physical-chemical quality such as temperature, oxygenation and nutrient conditions</li> <li>• Chemical quality that refers to environmental quality standards for river basin specific pollutants.</li> </ul> <p>A key part of the WFD is the creation of the River Basin Management Plan (RBMP) which requires identification of all the actions to be taken in a river basin to deliver the objectives of the WFD. The UK government updated RBMPs in 2015 to cover the period from 2015-2021. These have been prepared to fulfil the requirements of the WFD and will be updated in 2021.</p>	<p>Consider water, hydromorphological and biological quality of surface waters.</p>
European Landscape Convention	<p>Promotes the protection, management and planning of landscape and organises international co-operation on landscape issues. There are a number of general principles designed to provide guidance on some of the fundamental articles of the European Landscape Convention, including achieving landscape quality objectives, promote awareness and to define landscape strategies.</p>	<p>Consider implications of the Strategic Policies for landscape.</p>
Convention for the Protection of Architectural Heritage of Europe	<p>Aims to reinforce and promote policies for the conservation and enhancement of Europe's heritage. It affirms the need for European solidarity with regard to</p>	<p>Consider implications for Strategic Policies for conserving</p>

<b>Plan/ Policy/ Programme</b>	<b>Objectives and Requirements</b>	<b>Implications for the Strategic Assessment</b>
	heritage conservation and is designed to foster practical co-operation among the Parties. It establishes the principles of "European co-ordination of conservation policies" including consultations regarding the thrust of the policies to be implemented.	architectural heritage.
<b>National</b>		
Localism Act (2011)	<p>The Localism Act introduces a number of measures to decentralise decision making process to the local level, creating space for Local Authorities to lead and innovate, and giving people the opportunity to take control of decisions that matter to them. The Localism Act includes a number of important packages.</p> <ul style="list-style-type: none"> <li>• The new act makes it easier for local people to take over the amenities they love and keep them part of local life;</li> <li>• The act makes sure that local social enterprises, volunteers and community groups with a bright idea for improving local services get a chance to change how things are done.</li> <li>• The act places significantly more influence in the hands of local people over issues that make a big difference to their lives.</li> <li>• The act provides appropriate support and recognition to communities who welcome new development.</li> <li>• The act reduces red tape, making it easier for authorities to get on with the job of working with local people to draw up a vision for their area's future.</li> <li>• The act reinforces the democratic nature of the planning system passing power from bodies not directly to the public, to democratically accountable ministers.</li> <li>• The act enables Local Authorities to make their own decisions to adapt housing provision to local needs, and make the system fairer and more effective.</li> <li>• The act gives Local Authorities more control over the funding of social housing, helping them plan for the long- term.</li> </ul> <p>In relation to planning, the Localism Act enables the Government to abolish regional spatial strategies, introduce Neighbourhood Plans and Local Referendums.</p>	To ensure the concepts of the Localism Act are embedded within the Strategic Environmental Appraisal Framework.
National Planning Policy Framework (2019)	<p>Presumption in favour of sustainable development.</p> <p>Achieving sustainable development by:</p>	The SEA should be an integral part of the Park Plan preparation process, and should consider all the likely significant effects on the environment.

Plan/ Policy/ Programme	Objectives and Requirements	Implications for the Strategic Assessment
	Delivering a sufficient supply of homes.	Consider supply of housing.
	Building a strong, competitive economy.	Consider strengthening the economy.
	Ensuring vitality of town centres.	Consider the vitality of town centres.
	Promoting healthy and safe communities.	Consider the promotion of healthy and safe communities.
	Promoting sustainable transport	Consider sustainable transport.
	Supporting high quality communications.	Consider improvements to communications infrastructure.
	Making effective use of land.	Consider the use of previously developed land.
	Achieving well-designed places.	Consider good design.
	Protecting Green Belt Land.	Consider urban sprawl.
	Meeting the challenge of climate change, flooding, and coastal change.	Consider climate change mitigation and adaptation.
	Conserving and enhancing the natural environment.	Consider the conservation and enhancement of the natural environment.
	Conserving and enhancing the historic environment	Consider the conservation and enhancement of historic features.
	Facilitating the sustainable use of minerals.	Consider the avoidance of sterilisation of identified, viable mineral reserves.
National Planning Practice Guidance (2014)	The National Planning Practice Guidance provides technical guidance on topic areas in order to support policies set out within the NPPF. It aims to allow for sustainable development as guided by the NPPF.	The principles and requirements of national policy will need to be embedded within the SEA.

Plan/ Policy/ Programme	Objectives and Requirements	Implications for the Strategic Assessment
National Planning Policy for Waste (2014)	Sets out the Government's ambition to work towards a more sustainable and efficient approach to resource use and management. Replaces Planning Policy Statement 10.	Consider waste generation and management.
UK Government Sustainable Development Strategy: Securing the Future (2005)	<p>The Strategy sets out 5 principles for sustainable development:</p> <ul style="list-style-type: none"> <li>• Living within environmental limits;</li> <li>• Ensuring a strong, healthy and just society;</li> <li>• Achieving a sustainable economy;</li> <li>• Promoting good governance ; and</li> <li>• Using sound science responsibly.</li> </ul> <p>The strategy sets four priorities for action:</p> <ul style="list-style-type: none"> <li>• Sustainable consumption and production;</li> <li>• Climate change and energy;</li> <li>• Natural resource protection and environmental enhancement;</li> <li>• Sustainable communities</li> </ul> <p>The strategy commits to:</p> <ul style="list-style-type: none"> <li>• A programme of community engagement;</li> <li>• Forums to help people live sustainable lifestyles;</li> <li>• Open and innovative ways for stakeholders to influence decision; educating and training</li> </ul>	To ensure that the requirements of the Strategy are embedded within the SEA.
Historic England Corporate Plan 2015 to 2018 (2015)	<p>The plan sets out its three purposes as to:</p> <ul style="list-style-type: none"> <li>• Secure the preservation of ancient monuments and historic buildings;</li> <li>• Promote the preservation and enhancement of the character and appearance of conservation areas; and</li> <li>• Promote the public's enjoyment of, and advance their knowledge of, ancient monuments and historic buildings.</li> </ul>	Consider the historic environment.
The Carbon Plan: Delivering our Local Carbon Future (2011)	<p>The Carbon Plan sets out the government's plans for achieving the emissions reductions it committed to in the first four carbon budgets.</p> <p>Emissions in the UK must, by law, be cut by at least 80% of 1990 by 2050. The UK was first to set its ambition in law and the Plan sets out progress to date.</p>	Consider greenhouse gas emissions.
The Climate Change Act (2008)	<p>The Climate Change Act was passed in 2008 and established a framework to develop an economically credible emissions reduction path. It also strengthened the UK's leadership internationally by highlighting the role it would take in contributing to urgent collective action to tackle climate change under the Kyoto Protocol.</p>	Consider climate change.

Plan/ Policy/ Programme	Objectives and Requirements	Implications for the Strategic Assessment
	<p>The Climate Change Act includes the following:</p> <ul style="list-style-type: none"> <li>• 2050 target. The act commits the UK to reducing emissions by at least 80% in 2050 from 1990 levels. This target was based on advice from the CCC report: Building a Low- carbon Economy. The 80% target includes GHG emissions from the devolved administrations, which currently accounts for around 20% of the UK's total emissions.</li> <li>• Carbon Budgets. The Act requires the Government to set legally binding 'carbon budgets'. A carbon budget is a cap on the amount of greenhouse gases emitted in the UK over a five-year period. The first four carbon budgets have been put into legislation and run up to 2027.</li> </ul>	
The Air Quality Strategy for England vol. 1 (2007)	<p>The Air Quality Strategy sets out a way forward for work and planning on air quality issues by setting out the air quality standards and objectives to be achieved. It introduces a new policy framework for tackling fine particles, and identifies potential new national policy measures which modelling indicates could give further health benefits and move closer towards meeting the Strategy's objectives. The objectives of strategy are to:</p> <ul style="list-style-type: none"> <li>• Further improve air quality in the UK from today and long term.</li> <li>• Provide benefits to health, quality of life and the environment.</li> </ul>	Consider air quality.
Energy Act (2008)	<p>The Act works towards a number of policy objectives including carbon emissions reduction, security of supply, and competitive energy markets. Objectives: Electricity from Renewable Sources: changes to Renewables Obligation (RO), designed to increase renewables generation, as well as the effectiveness of the RO.</p> <p>Feed in tariffs for small scale, low carbon generators of electricity. Smart meters: the Act mandates a roll-out of smart meters to medium sized businesses over the next five years.</p> <p>Renewable heat incentives: the establishment of a financial support mechanism for those generating heat from renewable sources.</p>	Consider energy efficiency and climate change.
Flood and Water Management Act (2010)	<p>The Act aims to reduce the flood risk associated with extreme weather. It provides for better, more comprehensive management of flood risk for people, homes and businesses, helps safeguard community groups from unaffordable rises in surface water drainage charges, and protects water supplies to the consumer.</p>	Ensure that the SEA Framework encourages flood risk and water management.
National Infrastructure Plan (2014)	<p>The Infrastructure Plan allows for long term public funding certainty for key infrastructure areas such as: roads, rail, flood defences and science. All elements</p>	To ensure that the SEA Framework promotes efficient

<b>Plan/ Policy/ Programme</b>	<b>Objectives and Requirements</b>	<b>Implications for the Strategic Assessment</b>
	highlighted in the Plan represent firm commitment by government to supply the funding levels stipulated. The Plan also highlights what steps the government will take to ensure effective delivery of its key projects	infrastructure.
Wildlife and Countryside Act (1981)	The Act gives protection to protected species, native species (especially those at threat), controls non-native species, enhances the protection of SSSIs and builds upon the rights of way rules in the National Parks and Access to the Countryside Act 1949.	Consider the conservation of native species and protection of SSSIs.
Countryside and Rights of Way Act (2000)	<p>Provides a right of public access on foot to areas of open land comprising mountain, moor, heath, down, and registered common land, and contains provisions for extending the right to coastal land. The Act also provides safeguards which take into account the needs of landowners and occupiers, and of other interests, including wildlife</p> <p>The Act also places a duty on Government to have regard for conservation and biodiversity and maintain lists of species and habitats for which conservation steps should be taken or promoted, in accordance with the Convention on Biological Diversity. A particular emphasis is placed on public bodies to conserve and enhance Sites of Special Scientific Interest (SSSI).<sup>12</sup></p>	Consider rights to public access and consider conservation and enhancement of the natural environment.
Working with the grain of nature: a biodiversity strategy for England (2011)	<p>Sets out a programme for different sectors of economic activity to make the changes necessary to conserve, enhance and work with the grain of nature and ecosystems rather than against them.<sup>13</sup> These policy sectors are:</p> <ul style="list-style-type: none"> <li>- Agriculture</li> <li>- Water</li> <li>- Woodland</li> <li>- Marine and coastal Management</li> <li>- Urban areas</li> </ul>	Consider the implications of Strategic Policies for conserving and enhancing biodiversity.
Natural Environment White Paper (2014)	Sets out a vision for the natural environment of England over the next 50 years. It contains 92 specific commitments for action which aim to improve the quality of the natural environment, halt species and habitat decline, and strengthen the connection between people and nature.	Consider the conservation and enhancement of the natural environment and the protection and improvement of 'access to nature' opportunities.
Biodiversity 2020 (2011) A strategy for England's wildlife and	Outlines the Government's vision for the natural environment, shifting the emphasis from piecemeal conservation action towards a more integrated	Consider implications of strategic policies for biodiversity loss and

<sup>12</sup> <http://jncc.defra.gov.uk/page-1378>

<sup>13</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/69284/pb7718-biostrategy-021016.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69284/pb7718-biostrategy-021016.pdf)

Plan/ Policy/ Programme	Objectives and Requirements	Implications for the Strategic Assessment
ecosystem services.	landscape-scale approach. The biodiversity strategy for England builds on the Natural Environment White Paper and provides a comprehensive picture of how we are implementing our international and EU commitments. The aim of the strategy for the next decade is to halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people.	function of ecological networks.
Thames River Basin Management Plan (2015)	The document aims to provide a framework for protecting and enhancing the benefits provided by the water environment within the Thames basin. The document includes programme of measures, actions needed to achieve the objectives, including those in the Upper Lea and London Lea catchment.	Consider the water environment and aims of the Thames River Basin Management Plan.
Wild Mammals (Protection) Act 1996	Aims to protect wild mammals from acts of cruelty. An offence is committed if any person mutilates, kicks, beats, nails, or otherwise impales, stabs, burns, stones, crushes, drowns, drags, or asphyxiates any wild mammal with intent to inflict unnecessary suffering.	Consider implications of strategic policies on protection of wild mammals.
The Protection of Badgers Act 1992	<p>Protects badgers by making it a criminal offence, except where permitted by the Act, for a person to:</p> <ul style="list-style-type: none"> <li>• Wilfully kill, injure or take a badger.</li> <li>• Exert cruelty on a badger.</li> <li>• Interfere with badger setts in a way that has an adverse effect on the badger.</li> <li>• Sell or possess live badgers</li> <li>• Undertake marking and ringing of badgers.</li> </ul>	Consider implications of strategic policies on badgers.
The Conservation (Natural Habitats, &c.) Regulations 1994 (as amended) - The "Habitats Regulations"	<p>The Regulations provide for the designation and protection of 'European sites', the protection of 'European protected species', and the adaptation of planning and other controls for the protection of European Sites.</p> <p>Under the Regulations, competent authorities i.e. any Minister, government department, public body, or person holding public office, have a general duty, in the exercise of any of their functions, to have regard to the EC Habitats Directive.</p>	Consider implications of strategic policies on designated European sites.

<b>Plan/ Policy/ Programme</b>	<b>Objectives and Requirements</b>	<b>Implications for the Strategic Assessment</b>
Planning (Listed Buildings and Conservation Areas) Act 1990	The aim of the act is consolidate certain enactments relating to special controls in respect of buildings and areas of special architectural or historic interest with amendments to give effect to recommendations of the Law Commission.	Consider implications of Strategic Policies for Listed Buildings and Conservation Areas.
Ancient Monuments & Archaeological Areas Act 1979	The act consolidates and amends the law relating to ancient monuments; to make provision for the investigation, preservation and recording of matters of archaeological or historical interest and (in connection therewith) for the regulation of operations or activities affecting such matters; to provide for the recovery of grants under section 10 of the Town and Country Planning (Amendment) Act 1972 or under section 4 of the Historic Buildings and Ancient Monuments Act 1953 in certain circumstances; and to provide for grants by the Secretary of State to the Architectural Heritage Fund.	Consider implications of strategic policies for Ancient Monuments and Archaeological Areas.
<b>Regional</b>		
London Plan (2017)	<p>The London Plan is the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20–25 years. The document brings together the geographic and locational (although not site specific) aspects of the Mayor's other strategies – including those dealing with transport, economic development, housing, culture, health and well-being, climate change (adaptation and mitigation), air quality, noise and waste. The document sets the framework for the development and use of land in London, linking in improvements to infrastructure (especially transport); setting out proposals for implementation, coordination and resourcing and helping to ensure joined-up policy delivery by the GLA Group of organisations.</p> <p>Consultation on a new London Plan recently ended. The final document is to be finalised and published in Autumn 2019.</p>	Ensure the strategic policies and SEA Framework are consistent with the strategic policies and aspirations in the London Plan.