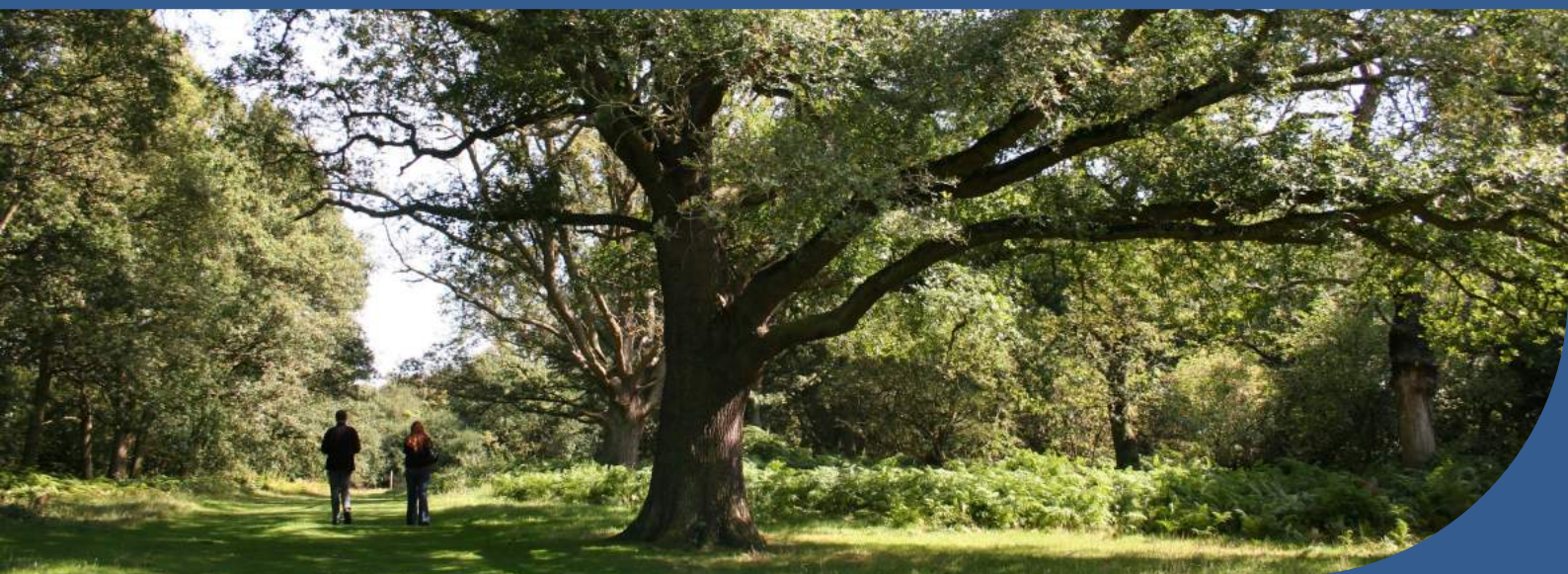


London Borough of Enfield

Enfield Epping Forest SAC Recreation Mitigation Strategy

September 2023



LEPUS CONSULTING
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY

London Borough of Enfield

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Acronyms & Abbreviations

CoL	City of London Corporation
DEFRA	Department for Food and Rural Affairs
ELP	Enfield Local Plan
GI	Green Infrastructure
GLA	Greater London Authority
HRA	Habitats Regulations Assessment
LPA	Local Planning Authority
LSOA	Lower Super Output Area
MUGA	Multi Use Games Area
PRoW	Public Right of Way
SAC	Special Area of Conservation
SAMM	Strategic Access Management and Monitoring
SANG	Suitable Area of Natural Greenspace
SINC	Site of Importance for Nature Conservation
SPA	Special Protection Area
ZoI	Zone of Influence

Introduction

Epping Forest SAC (Credit: Lepus Consulting)



1 Introduction

1.1 Epping Forest Special Area of Conservation

1.1.1 Epping Forest was designated as a Special Area of Conservation (SAC) in April 2005¹. It is protected under the Conservation of Habitats and Species Regulations 2017 (as amended)², known as the Habitats Regulations, and forms part of the UK National Site Network.

1.1.2 Epping Forest SAC comprises a large-scale wood pasture which supports a mosaic of habitats of high nature conservation value including features such as ancient and semi-ancient natural woodland, old grassland plains, wet and dry heathland and scattered wetlands including rivers, streams and bogs³. The SAC's qualifying features include the following⁴:

- Northern Atlantic wet heaths with *Erica tetralix*; Wet heathland with cross-leaved heath H4030. European dry heaths
- Atlantic acidophilous beech forests with *Ilex* and sometimes also *Taxus* in the shrublayer (*Quercion robori-petraeae* or *Ilici-Fagenion*); Beech forests on acid soils
- *Lucanus cervus*; Stag beetle

1.2 Habitats Regulations Assessment

1.2.1 The Habitats Regulations require Enfield Council, as the competent authority, before deciding to undertake or give any consent, permission or other authorisation for a plan or project, must make an appropriate assessment of the implications of the plan or project for that site in view of its site conservation objectives. These tests are referred to collectively as a Habitats Regulations Assessment (HRA).

¹ JNCC. 2005. Natura 2000 - Standard Data Form. UK0012720. Epping Forest. Available at: <https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0012720.pdf> [Date Accessed: 18/07/23].

² The Conservation of Habitats and Species Regulations 2017 SI No. 2017/1012, TSO (The Stationery Office), London. Available at: <https://www.legislation.gov.uk/uksi/2017/1012/contents> [Date Accessed: 14/04/23] as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. Available at: <https://www.legislation.gov.uk/ukdsi/2019/9780111176573> [Date Accessed: 14/04/23]

³ Natural England. 2019. European Site Conservation Objectives: Supplementary advice on conserving and restoring site features. Epping Forest (SAC) Site Code: UK0012720. Available at: <https://publications.naturalengland.org.uk/publication/5908284745711616> [Date Accessed: 25/05/23]

⁴ Natural England. 2018. European Site Conservation Objectives for Epping Forest Special Area of Conservation Site Code: UK0012720. Available at: <https://publications.naturalengland.org.uk/publication/5908284745711616> [Date Accessed: 25/05/23]

1.2.2 Enfield Council is in the process of updating its adopted local plans⁵ and borough-wide Core Strategy⁶. The new Enfield Local Plan (ELP) will guide future spatial development within Enfield up to 2039 and beyond. The ELP considers the amount and types of future new development that is required in the borough, as well as when it is needed and in what form. It also sets out how this growth will be delivered in a sustainable manner. An HRA is being undertaken in support of the ELP.

1.2.3 Epping Forest SAC is located to the East of Enfield, and at its closest point is around 0.3km from the edge of the borough (see **Figure 1.1**). The HRA process has identified that Epping Forest SAC is vulnerable to high levels of existing recreational pressure from activities such as dog walking and mountain biking and is also sensitive to changes in air quality. Any further increase in recreational pressures and traffic-related air pollution as a result of planned development in the Local Planning Authorities (LPAs) which are located within a defined Zone of Influence (Zoi) from the SAC has the potential to worsen these impacts and compromise the ability of the SAC to achieve its conservation objectives.

1.3 Enfield Epping Forest SAC Recreation Mitigation Strategy

1.3.1 Since 2017, Enfield Council has been working with Natural England, affected LPAs within the Epping Forest SAC Zoi⁷ and the City of London Corporation (CoL), who manages the SAC, as part of a Technical Oversight Group to develop a strategic approach to address impacts at the SAC. The strategic recreational impacts solution comprises two components:

- Strategic access management and monitoring measures (SAMM) at the SAC itself to mitigate on site recreational impacts; and
- Provision of suitable alternative natural greenspaces (SANG) to divert visitors away from the SAC and avoid recreational impacts.

1.3.2 The Epping Forest Strategic Access Management and Monitoring Strategy (SAMMS) Governance and Tariff Schedule has been developed and approved by all parties⁸.

1.3.3 An Enfield Epping Forest SAC Recreation Mitigation Strategy is also required for each affected LPA to demonstrate that alternative natural greenspaces can be provided to divert visitors and avoid recreational impacts upon the SAC.

1.3.4 The Enfield Epping Forest SAC Recreation Mitigation Strategy for the ELP is contained within this document. It shows how provision of SANG will be delivered to divert visitors generated by new growth in the ELP away from the SAC and avoid recreational impacts. The Strategy provides details on SANG sites and enhancements that are required at each site to ensure they will deliver effective recreational mitigation. The selection of all sites, development of enhancement measures and monitoring requirements have been developed in consultation with Natural England through a series of meetings and a site visit.

⁵ <https://www.enfield.gov.uk/services/planning/adopted-plans>

⁶ <https://www.enfield.gov.uk/services/planning/adopted-plans>

⁷ Epping Forest District Council; London Borough of Newham; London Borough of Redbridge; London Borough of Waltham Forest

⁸ <https://governance.enfield.gov.uk/documents/s99969/Appendix%201.%20EFSAC%20governance%20agreement%20FINAL%20ONE%20v.%2013.0.pdf>

- 1.3.5 This Strategy will be delivered in tandem with the Epping Forest SAMMS through implementation of Policy SPBG3 of the ELP. This policy will ensure there are no adverse recreational impacts upon site integrity at Epping Forest SAC either alone or in-combination.

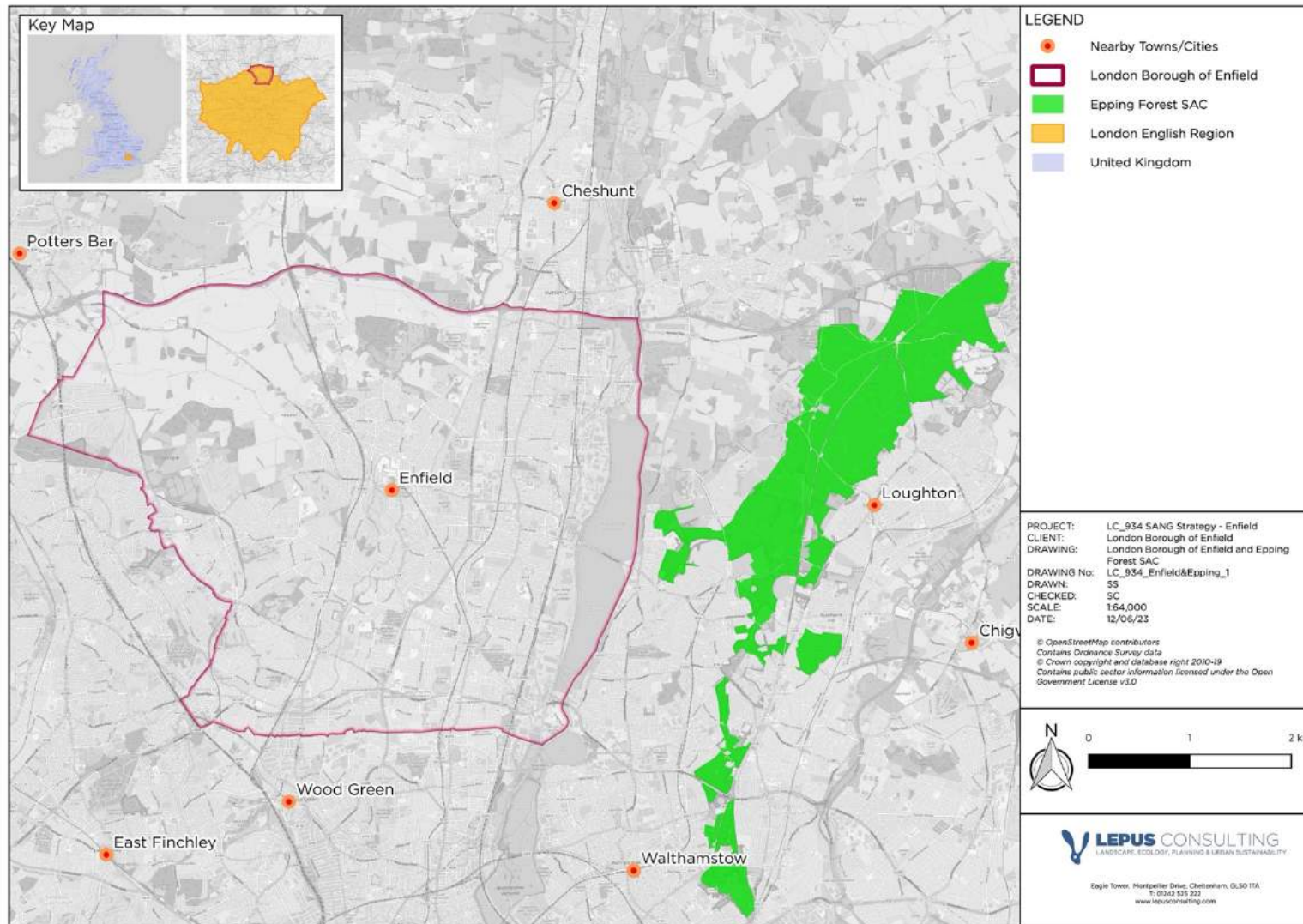


Figure 1.1: Local Plan area and relationship to Epping Forest SAC

Background

Epping Forest SAC (Credit: Lepus Consulting)



2 Background

2.1 Habitats Regulations Assessment

2.1.1 The HRA process assesses the potential effects of a plan or project on the conservation objectives of sites designated under the Habitats⁹ and Birds¹⁰ Directives. These sites form a system of internationally important sites throughout Europe known collectively as the 'Natura 2000 Network'. In line with the Habitats Regulations, UK sites which were part of the Natura 2000 Network before leaving the EU, have become part of the National Site Network.

2.1.2 The Habitats Regulations¹¹ provide a definition of a European site at Regulation 8. These sites include Special Areas of Conservation (SAC), Sites of Community Importance, Special Protection Areas (SPA) and sites proposed to the European Commission in accordance with Article 4(1) of the Habitats Directive.

2.1.3 In addition, policy in England and Wales notes that the following sites should also be given the same level of protection as a European site¹². European sites together with sites set out in national policy (listed below) are referred to in England and Wales as a Habitats site¹³.

- A potential SPA (pSPA)
- A possible / proposed SAC (pSAC)
- Listed and proposed Ramsar Sites (wetland of international importance)
- In England, sites identified or required as compensation measures for adverse effects on statutory Habitats sites, pSPA, pSAC and listed or proposed Ramsar sites.

⁹ Official Journal of the European Communities (1992). Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora.

¹⁰ Official Journal of the European Communities (2009). Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds.

¹¹ Conservation of Habitats and Species Regulations 2017 SI No. 2017/1012, TSO (The Stationery Office), London. Available at: <https://www.legislation.gov.uk/uksi/2017/1012/contents> [Date Accessed 14/04/23] as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. Available at: <https://www.legislation.gov.uk/ukdsi/2019/978011176573> [Date Accessed: 14/04/23]

¹² Ministry of Housing, Communities & Local Government (2021). National Planning Policy Framework. Para 181. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf [Date Accessed: 14/04/23]

¹³ Habitats site: Any site which would be included within the definition at regulation 8 of the Conservation of Habitats and Species Regulations 2017 for the purpose of those regulations, including candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation, Special Protection Areas and any relevant Marine Sites. Ministry of Housing, Communities & Local Government (2021). National Planning Policy Framework. Para 181. Available in Annex 2 (Glossary) at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf [Date Accessed: 14/04/23]

2.1.4 Regulation 105 of the Habitats Regulations notes a competent authority, before deciding to undertake, or give any consent, permission or other authorisation for, a land use plan, must make an appropriate assessment of the implications of the plan or project for that site in view of its site conservation objectives. These tests are referred to collectively as a Habitats Regulations Assessment (HRA) and are being undertaken in support of the ELP.

2.2 Potential Adverse Recreational Impacts on Site Integrity

2.2.1 A number of the SAC's qualifying features (wet heathland with cross-leaved heath, European dry heaths and Beech forests on acid soils) are sensitive to public access and disturbance threats and pressures, including recreation impacts such as excessive dog-waste and intensive mountain-biking¹⁴.

2.2.2 The SAC is owned and managed by the City of London (CoL). There are 52 different car parks and four visitor centres across the SAC including the main visitor centre at Chingford. Promoted activities which can be undertaken at the SAC include cycling (but not trail riding), dog walking, fishing, horse riding (with licence), playing football (at Wanstead Flats) and golf (at Chingford Golf Course) and walking and running. Route maps and codes of conduct are provided by the CoL for these activities. The forest includes over 284km of paths with ten waymarked trails and a number of short walks.

2.2.3 Common impacts caused by increased recreational pressure include the following¹⁵:

- Eutrophication from dog fouling
- Trampling/wear, leading to soil compaction, vegetation wear, erosion and damage to veteran tree roots
- Increased fire risk (and potentially difficulties in access for emergency vehicles if gates etc. are blocked)
- Difficulties in establishing the best grazing management due to interactions between visitors and livestock
- Direct damage to veteran trees, for example by climbing
- Harvesting, for example of fungi or deadwood
- Disturbance to invertebrates and other wildlife
- Spread of disease
- Spread of alien plants
- Staff time taken away from necessary management due to the need to deal with vandalism, breaches of byelaws etc
- Direct damage and vandalism of infrastructure.

2.2.4 Epping Forest SAC is underpinned by Epping Forest Site of Special Scientific Interest (SSSI). This SSSI is made up of 41 SSSI units, of which only nine are currently within a favourable condition status (see **Figure 2.1**)¹⁶. One reason listed as causing the unfavourable condition of these units is recreational pressure.

¹⁴ Natural England. 2016. Site Improvement Plan Epping Forest V1.1. Available at: <https://publications.naturalengland.org.uk/publication/666344685463142> [Date Accessed: 25/05/23]

¹⁵ Liley, D., (2022). Epping Forest Visitor Survey (2022). Unpublished report by Footprint Ecology for Epping Forest District Council.

¹⁶ Natural England Designated Sites View. <https://designatedsites.naturalengland.org.uk/SiteSearch.aspx> [Date Accessed: 25/05/23]

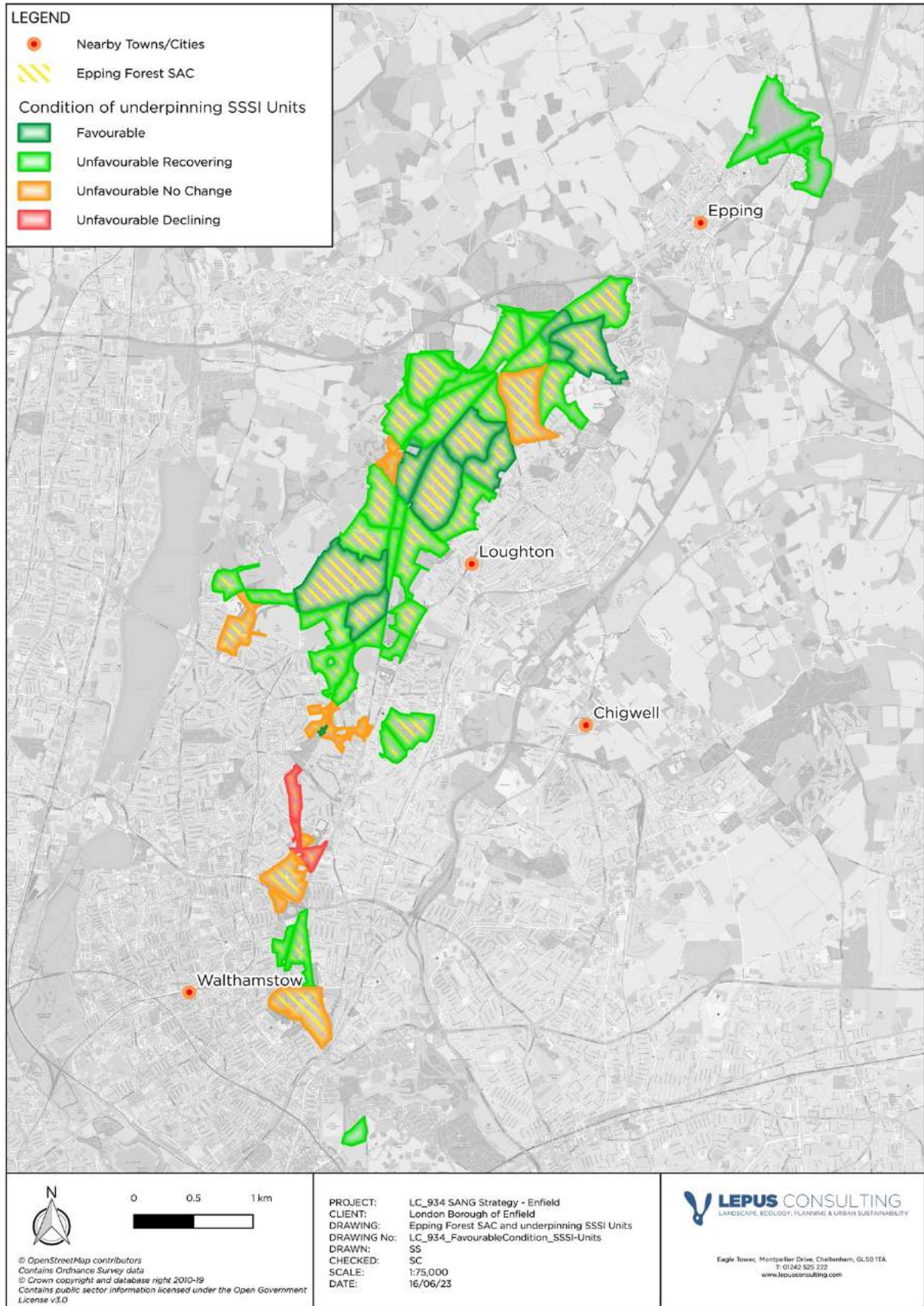


Figure 2.1: Epping Forest SAC and favourable condition status of the underpinning SSSI Units

- 2.2.5 Due to concerns over the impact of recreational pressure on Epping Forest SAC, visitor surveys were commissioned in 2017¹⁷ and 2019¹⁸, with a post Covid survey commissioned by the London Borough of Waltham Forest in 2022. It is noted that the 2022 visitor survey did not use the same survey locations as previous surveys.
- 2.2.6 The visitor surveys provided information on where visitors originate from, alongside data on reasons for visiting, how the site is accessed (mode of transport), activities undertaken, frequency of visits, time spent on site and route distribution / length. This data indicates that the main activity undertaken on site is dog walking, followed by walking. Other activities undertaken included an outing with family, cycling / mountain biking, running and enjoying the scenery. A high proportion of visitors across both survey years (approximately a quarter of interviewees) visited the site frequently (daily). A large number of interviewees arrived by car in both survey years by car (over two thirds), with a much smaller proportion arriving by foot (less than a quarter). A key reason for visiting the site given by respondents to both surveys was closeness to home. The average route length taken by walkers and dog walkers over both the 2017 and 2019 surveys was shown to be between 2.2km and 2.99km, with longer routes taken by cyclists and runners.
- 2.2.7 The 2017 report identified that 75% of visitors travelled up to 6.2km to the SAC and this distance was used to define a Zol for recreational impacts. Following further survey work carried out in Autumn 2019, Natural England advised that it was appropriate to continue using the distance of 6.2km. To ensure consistency between LPAs, a Zol of 6.2km has been applied for the purposes of this Strategy (see **Figure 2.2**).

¹⁷ Footprint Ecology. Liley, D., Panter, C., Weitowitz, D. & Saunders, G. (2018). Epping Forest Visitor Surveys 2017. Unpublished report by Footprint Ecology for the City of London Corporation as Conservators for Epping Forest.

¹⁸ Footprint Ecology. Liley, D. (2020). Epping Forest Visitor Surveys 2019. Unpublished report by Footprint Ecology for Epping Forest District Council.

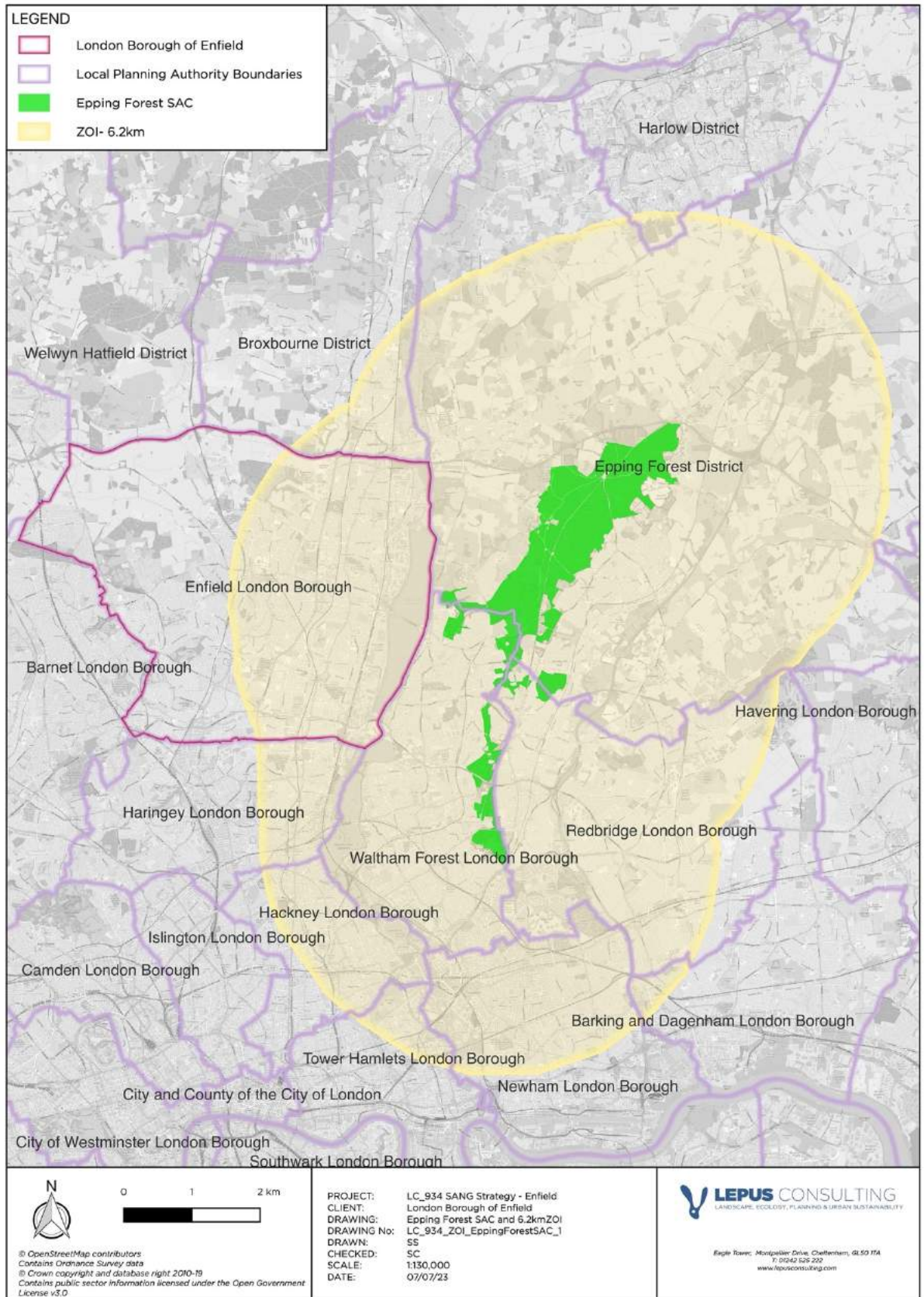


Figure 2.2: Epping Forest SAC Zone of Influence (based on 2017 visitor survey data)

2.2.8 The Epping Forest SAC Zol covers multiple local authority administrative areas, of which seven each contribute over 2% of visits to the SAC. The boroughs which contribute over 2% of visits to the SAC (based on the 2019 visitor survey) are listed below. A Technical Oversight Group has been established to provide a vehicle for joint working between these LPAs and other organisations responsible for protection of Epping Forest SAC including the City of London Conservators and Natural England. This group meets on a quarterly basis.

- Epping Forest District Council
- London Borough of Waltham Forest
- London Borough of Redbridge
- London Borough of Enfield
- London Borough of Newham

2.2.9 Housing delivery will lead to a significant rise in population within the boroughs and districts around Epping Forest SAC. Investigations of the visitor patterns of current residents around the SAC have shown that it is likely that this new population will also use the SAC for recreation. As such, a strategic solution is required to address future recreational impacts and ensure conservation objectives of the SAC are achieved. As detailed in **Section 1.3**, this solution comprises SAMP to mitigate on site recreational impacts at the SAC itself and SANG to provide alternative space to avoid impacts upon the SAC.

2.2.10 A key component of the Strategy will be continued monitoring of visitor numbers at the SAC. This will provide an important feedback mechanism for the Strategy, detailing information on visitor origin. Depending on the output of SAC visitor surveys it may be necessary to update the Strategy to reflect up to date origin data and numbers.

Mitigation Requirements

Albany Park, Enfield (Credit: Lepus Consulting)



3 Mitigation Requirements

3.1 Introduction

3.1.1 This section provides information on how the Enfield Epping Forest SAC Recreation Mitigation Strategy, alongside SAMM contributions, will ensure the ELP will have no adverse impact on the site integrity of Epping Forest SAC in terms of recreational impacts from a net increase in residential dwellings within the Zol.

3.2 SANG Calculation Methodology

Epping Forest Visitors per year

3.2.1 Estimates of visitor use from before the Covid pandemic indicate that around 4.2 million visitors went to Epping Forest SAC each year¹⁹. The CoL corporation suggests a likely 12% increase to these numbers in 2022 to 4.8 million²⁰. The 2020-2021 Epping Forest Management Strategy Annual review suggests that post-covid, visitors rose to 1.3 million over a six-week period, with visits over the year of around 11 million²¹. No new visitor figures were provided in the most recent Management Strategy review (2021-2022)²². A CoL Place Performance Report indicates that total footfall in Epping Forest in 2022 was 7,974,474²³. Enfield Council is committed to working with the City of London to continue to monitor visitor numbers at the SAC through the SAMM Strategy monitoring commitments.

Zone of Influence

3.2.2 As set out in **Section 2**, visitor surveys have shown that the Zol for recreational impacts at Epping Forest SAC is 6.2km (straight line distance from the SAC) as shown in **Figure 2.2**.

The population that visitors derive from

3.2.3 Within the 6.2km Zol there is a total population of 1,501,354 persons (across parts of Enfield, Epping Forest, Newham, Redbridge, and Waltham Forest). This is based on 2021 Lower Super Output Area (LSOA) mid-year estimates²⁴.

¹⁹ City of London. 2021. Epping Forest Management Strategy – London’s Great Forest. Available at: <https://www.cityoflondon.gov.uk/assets/Green-Spaces/epping-forest-management-plan.pdf> [25/05/23]

²⁰ Waltham Forest. September 2022. Waltham Forest Green Spaces and Places SPD. Part 1: Suitable Alternative Natural Greenspace (SANGs).

²¹ City of London. 2020-2021. Epping Forest Annual Review. Available at: <https://www.cityoflondon.gov.uk/assets/Green-Spaces/epping-forest-annual-review.pdf> [25/05/23]

²² <https://www.cityoflondon.gov.uk/assets/Green-Spaces/Epping-Forest/epping-forest-annual-review-2022.pdf>

²³ Huq. 5th April 2023. Place Performance Report. City of London: Focus on Epping Forest.

²⁴ Where the median buffer runs through an LSOA, the population was estimated on the basis of the percentage of the LSOA area within the buffer using GIS analysis tools.

Average number of visits made per resident

3.2.4 The visit rate varies with distance from Epping Forest SAC, with a higher proportion of visitors originating close to the SAC and reducing as distance increases. This is illustrated in Table 13 and Figure 11 of the Epping Forest Visitor Survey, 2019 (extracted at **Figure 3.1** for ease of reference).

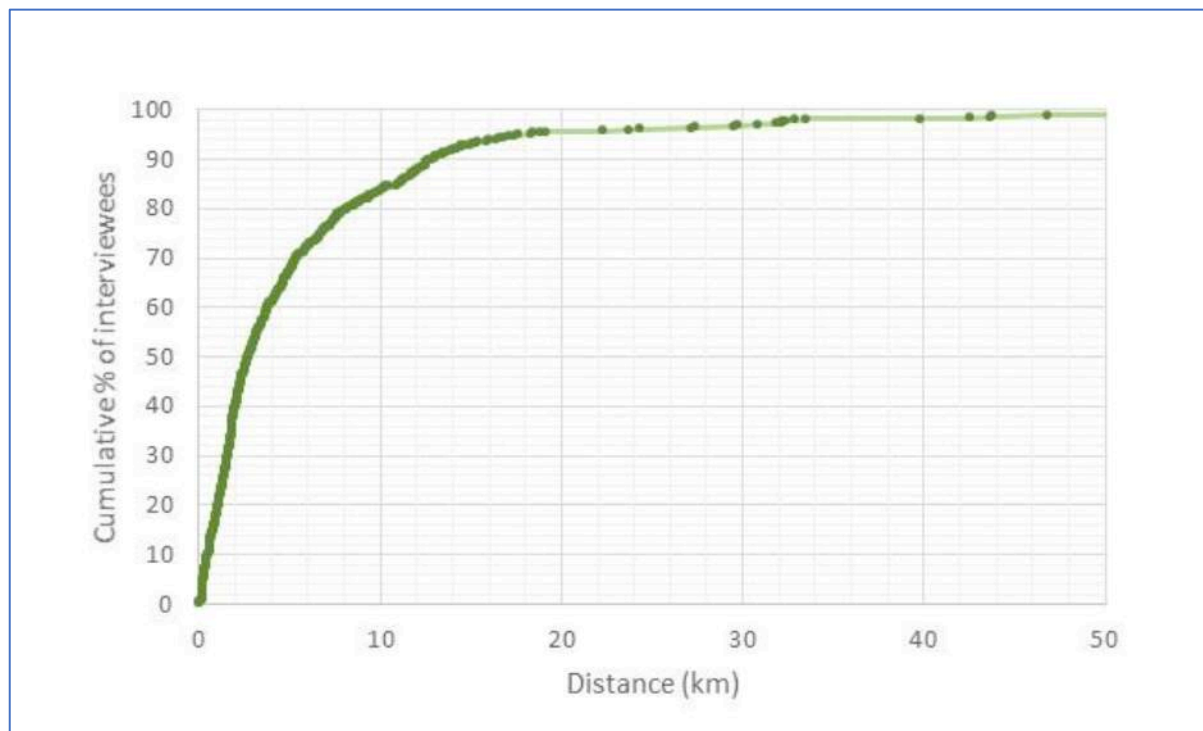


Figure 3.1: Cumulative % frequency of distances between the home postcode and survey location. Plot generated using data for all interviews at SAC Survey Point (i.e. excluding Wanstead Flats) – Extracted from 2019 visitor surveys report²⁵.

3.2.5 The 2017 visitor surveys show that 1% of visitors were found to originate from Enfield (3 respondents), visiting once a month, 2-3 times per month and 1-3 times a week. The 2019 visitor survey data saw a rise in visitors from Enfield to 2% (12 respondents) with five visiting the SAC for the first time, two visiting 1-3 times a week, two less than once a month and three once a month. This data is likely to reflect the barriers to movement between Enfield and the SAC.

²⁵ Footprint Ecology. Liley, D. (2020). Epping Forest Visitor Surveys 2019. Unpublished report by Footprint Ecology for Epping Forest District Council.

3.2.6 Epping Forest SAC is located approximately 3km to the east of Enfield. There is an absence of Public Rights of Way (PRoW) linking Enfield and the SAC, with the exception of the London Loop to the north of the Borough. It is therefore unlikely that any visitors from Enfield arrive at the SAC by foot only. The A10 Great Cambridge Road and A1010 Hertford Road impede east-west movement, and the North Circular Road (A406) and M25 make it difficult to walk into and out of the Borough. This road network, combined with restricted access at the William Girling and King George's Reservoirs on the Borough's eastern boundary, present barriers to movement via walking and cycling from Enfield to the SAC. By car, access between Enfield and the SAC is only possible via the A110, A406 and the M25. Whilst Enfield is well served by public transport (trains, the London Underground Line and bus routes), these predominantly link to London and do not provide direct access to the SAC for residents.

3.2.7 Visits from the whole Zol area have been taken into consideration to calculate average visits made per resident per day to the SAC. The Zol represents the distance within which 75% of all visitors surveyed in 2017 originated from. It covers a distance of 6.2km from the SAC and reflects the distance adopted in the SAMM strategy. To calculate the average number of visits made per resident per day to the SAC, the total number of visits made to the SAC (7,974,474) is multiplied by the 75th percentile (a factor of 0.75). This is then divided by the current population within the Zol and divided by 365 days. As noted in **Section 3.3**, the 2021 mid-year estimates by LSOA were used to determine the total population within the Zol (1,501,354). This indicates that the average number of visits from the Zol per person per year to the SAC is circa 4 visits, or 0.0109 visits per person per day.

Equation for calculating average visits made per resident per day

7,974,474 (total visits are made) x 0.75 (median) ÷ by 1,501,354 (population visitors are derived from within Zol area) = an average of 3.984 visits to Epping Forest per person per year. When ÷ by 365 days = 0.0109 average visits made per resident per day.

Calculating visitor uplift

3.2.8 Details of all the sites that are expected to be delivered through the ELP are set out in the Council's latest Housing and Economic Land Availability Assessment (HELAA). These have been filtered to identify sites within the Zol and remove sites which have been completed, consented or with full planning permission. **Figure 3.2** illustrates all sites which fall within the Zol.

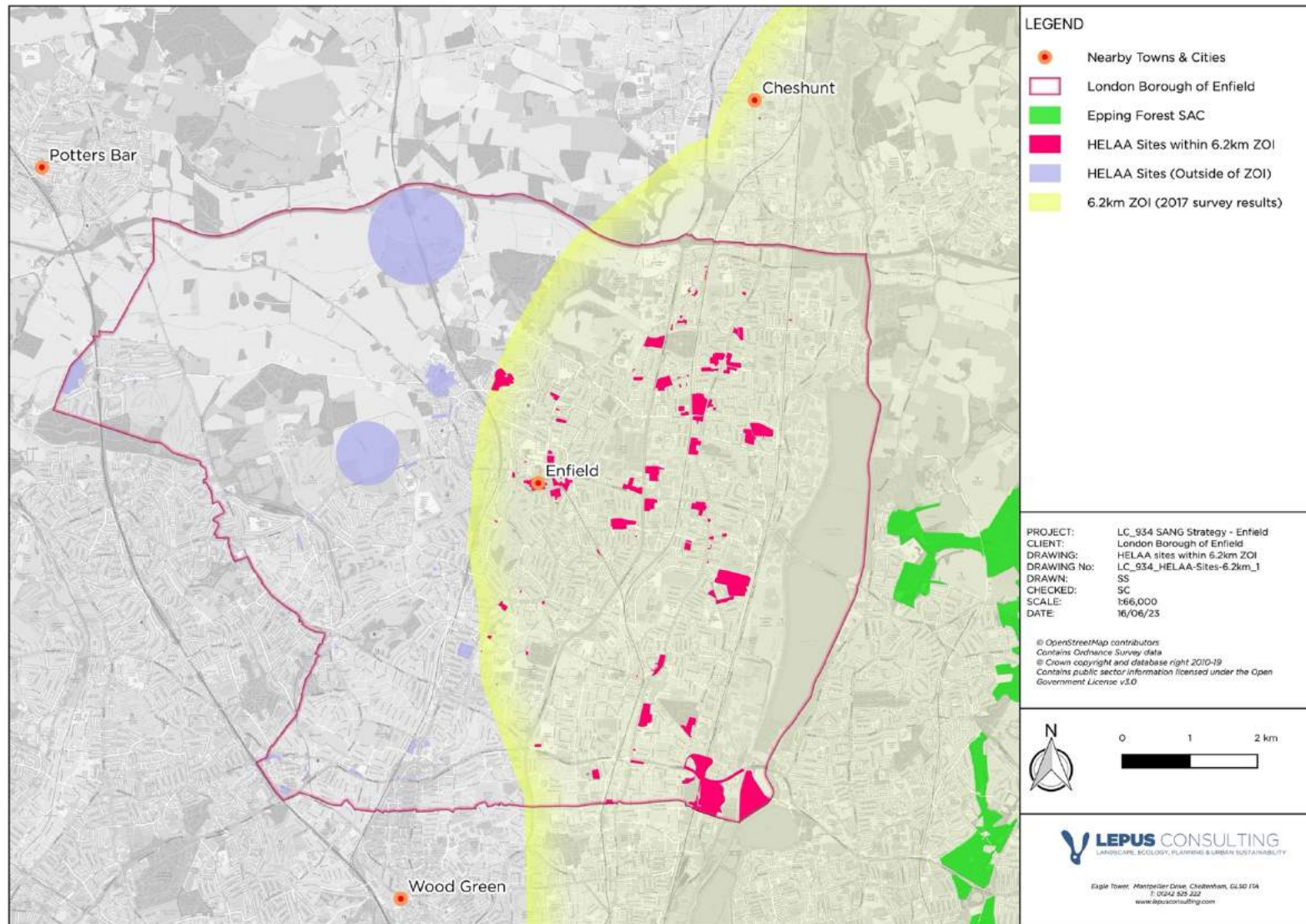


Figure 3.2: HELAA Site location in relation to Epping Forest SAC ZOI (6.2km)

3.2.9 Based on current HELAA sites, there will be a total of 10,059 residences within the Epping Forest Zol as a result of the ELP. Taking into consideration an occupancy rate of 2.75 (based on recent national statistics data for Enfield), this equates to 27,662 new residents. An allowance for windfall has been made for the area of Enfield within the Zol of 1,772 residences which equates to 4,873 new residents. This indicates a total of 37,078 new people will be resident within the Zol over the ELP period. This would provide a total visitor uplift requirement for Enfield of **355.093**. Visitor uplift is defined as the average number of visits made by the total new residents (from the ELP in the Zol) in a day.

3.3 Natural England Advice - A Toolbox Approach

3.3.1 In correspondence to affected LPAs on 5th March 2020, Natural England set out guidance on a strategic approach to recreational mitigation at Epping Forest SAC. This recognised that in London availability of green space across the boroughs may mean that the traditional 8ha/1000 population standard for SANGs, which relates specifically to recreational mitigation for the Thames Basin Heaths Special Protection Area (SPA), may not be possible. As such, Natural England set out measures which may be considered acceptable forms of SANG type mitigation from a toolbox of measures. These are set out below.

- Traditional SANG, meeting the 8ha minimum standard, meeting the guidelines
- SANG networks, either not meeting the standard, or all of the traditional guidelines, but does provide a semi natural experience of a size greater than 2ha for the local populous
- Strategic SANG, as discussed above provided by a third party. Options to look at areas such as Olympic Park or Hackney Marshes
- SAMM+ Contribution, directly funding a significant project from the City of London's proposed complete solution. Reducing the overall requirement strategically, but dealing with a likely acute development issue, due to size of development or proximity to the SAC
- Offsite Public Rights of Way improvements away from the SAC. Provides an opportunity to improve accessibility to current green spaces in the London Boroughs from the new developments and beyond
- Bespoke Wardens provided to manage visitor engagement on SANGs other green spaces in the Boroughs
- A new Education Centre / Facility focused on managing behaviours at the SAC
- Dog Training Areas on the site somewhere, small fenced areas where people could train their dogs, recall etc, without being on the SAC
- Contributions to other Green Infrastructure in the vicinity (improvements to accessibility or biodiversity on them). Natural England has seen a lot of positive suggestions, opening up areas of green, removing culverts on river sections, extra habitat planting or riverside walks
- Contribution to the City of London for something else outside of the SAMM project requirements
- Reduce access to the SAC from any particular development with physical barriers
- Secure measures to provide garden waste provision on site, to protect garden refuse or fly tipping on the SAC, where gardens are part of the application

3.4 Enfield Policy Context

3.4.1 Enfield Council has prepared a Blue and Green Infrastructure Strategy to protect, maintain and enhance the borough's network of blue and green assets in response to challenges such as climate change, addressing inequalities in access to publicly accessible green spaces and addressing public health and well-being issues²⁶. This strategy was informed by a number of pieces of evidence including a Blue and Green Infrastructure Audit²⁷, a Review of Sites of Importance for Nature Conservation (SINCs)²⁸ and a Review of the Enfield Biodiversity Action Plan (BAP)²⁹.

3.4.2 The Blue and Green Infrastructure Audit identified a public open space target of 2.15ha/1000 residents. When an average was taken, the audit showed that across the Borough as a whole, this target is currently being achieved, but is not evenly spread across each ward. The audit indicated that in the future, with future new housing growth it is unlikely that this target will be met. The key aims of this Strategy include the following:

- “A commitment to move from net loss to net gain of open space and biodiversity;
- New targets and standards to guide open space provision, habitat creation and urban greening, targeting the most deficient areas (e.g. Edmonton and Ponders End);
- Work to restore Enfield's water spaces, creating healthy rivers with abundant wildlife, more resilient to flooding and drought;
- Active management of our parks and open spaces to support our cultural agenda, with leisure activities that attract visitors (including festivals and outdoor events);
- Work to better reveal the unique significance of our historic parks and gardens;
- Making our streets and public spaces accessible to everyone through positive enhancements (e.g. new active travel routes and public parks) to anchor new developments, such as Meridian Water; and
- The creation of a new ‘green loop’ from the open countryside into the heart of our town centers and densely built-up-areas along river corridors and strategic links”.

3.4.3 The Blue and Green Strategy aims to achieve a 25% increase in blue and green infrastructure in Enfield and ensure residents can access this within 15-minutes, ensure a fair distribution of this across the borough, enhance biodiversity and the water environment and provide innovative spaces for all users. It sets out an approach to link up the blue and green network through corridors (known as the ‘green lungs’ of the borough), spokes, nodes and important assets and looks at where investment will be focused to address deficits / surpluses across the borough. It also identifies a series of large-scale projects to deliver multiple functions and benefits across the wider network.

²⁶ Enfield Council. June 2021. Enfield's Blue and Green Strategy (2021 – 2031)

²⁷ Land Use Consultants. 2020. Enfield Blue and Green Infrastructure Audit.

²⁸ Land Use Consultants. 2021. Review of Sites of Importance for Nature Conservation. An Addendum to the Enfield Blue and Green Strategy.

²⁹ Land Use Consultants. 2021. Review of the Enfield Biodiversity Action Plan An addendum to Enfield's Blue and Green Strategy.

3.4.4 This Enfield Epping Forest SAC Recreation Mitigation Strategy aims to target mitigation recommendations set out in Natural England's toolbox approach (**Section 3.3**), whilst complimenting Enfield's Blue and Green Infrastructure Strategy framework and enhancing opportunities provided by the projects within the framework. The Enfield Epping Forest SAC Recreation Mitigation Strategy also aims to contribute towards east-west landscape connections along the arc of green wedges from the Lee Valley Regional Park to Trent Park, Whitewebbs Park, Enfield Chase, Enfield Town and Enfield Playing Fields. It also aims to contribute to deficiencies in access to green spaces across the borough by ensuring SANG is easily accessed from proposed future dwellings set out in the ELP.

3.5 Natural England's Green Infrastructure Framework

3.5.1 Natural England's Green Infrastructure (GI) Framework is a commitment in the Government's 25 Year Environment Plan. It aims to support the greening of towns and cities and connections with the surrounding landscape as part of the Nature Recovery Network. It acknowledges that, at present, access to green and blue spaces varies considerably across the country, and there are opportunities for these important assets to be better managed for the environment and to deliver a wider range of multifunctional benefits. The Framework recommends that Local Authorities provide 3 hectares of publicly accessible green space per 1,000 population, taking into consideration local accessible greenspace baseline, and considering local needs, opportunities, and constraints³⁰. The GI Framework however recognises that a higher standard than the Accessible Greenspace Standards is often set and that the effectiveness of SANG as mitigation will also depend upon its location and importantly its design.

3.6 Enfield's approach to SANG selection

3.6.1 Potential SANG sites were identified through a review and analysis of possible future blue and green infrastructure projects across Enfield. The key purpose of SANG is to provide an attractive, realistic alternative green space for people who would otherwise have visited the SAC and therefore avoid impacts³¹. This was a key consideration in shortlisting potential SANG projects.

3.6.2 SANGs may be created from the following:

- Existing open space of SANGs quality with no existing public access or limited public access, which for the purposes of mitigation could be made fully accessible to the public
- Existing open space which is already accessible, but could be changed in character so that it is more attractive to the specific group of visitors who might otherwise visit the SAC
- Land in other uses which could be converted into SANGs.

³⁰ Natural England. 2023. Green Infrastructure Planning Framework. Available at: <https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx> [Date Accessed: 25/05/23]

³¹ Natural England. August 2021. Guidelines for Creation of Suitable Alternative Natural Greenspace (SANG).

- 3.6.3 Enfield Council has received government funding from the Department for Food, Rural Affairs (DEFRA) as part of the Landscape Recovery Scheme, which is one of the Environmental Land Management Schemes aimed at subsidising farmers to undertake work which enhances the environment. This pilot project and spatial plan will be a test case for the new Environmental Land Management schemes that will be rolled out across England from 2025 onwards as part of the 25 Year Environment Plan. Landscape Recovery aims to support large-scale land-use change through habitat and ecosystem restoration to provide long-term environmental benefits. It will be a long-term project running for at least 20 years, extending beyond the ELP and will cover a core area of approximately 634ha of land.
- 3.6.4 Enfield Chase is a former royal hunting forest in Enfield. In the Middle Ages this area was part of an extensive forest that stretched northwards for 12 miles from the City of London. In modern times, much of this forest has been lost through urbanisation and conversion to farmland. However, there are still significant, if fragmented, remnants of historic woodland existing within parts of Enfield's Green Belt land. The Landscape Recovery Project will contribute to the Council's aims for re-wilding Enfield Chase, working alongside Thames21, to create hundreds of hectares of woodlands, grassland and wetlands and restore rivers. Up to 1,000 hectares of farmland will be converted into a publicly accessible natural space which will link to existing parks and open spaces across Enfield.
- 3.6.5 Whilst not a SANG, the Enfield Chase Landscape Recovery Project has the potential to provide a realistic alternative recreational opportunity away from Epping Forest SAC for new residents in Enfield. The project aims to link the rewilded area in the west of the borough to more urban areas of Enfield in the east, through both active travel options and public transport with some key Gateway entrance points. In terms of visitor attractions, proposals include incorporation of a visitor / heritage centre, mountain biking trail centre, wild swimming, a network of cycle and walking trails and loops and play features. **Figure 3.3** provides an indicative overview for the Landscape Recovery Project.

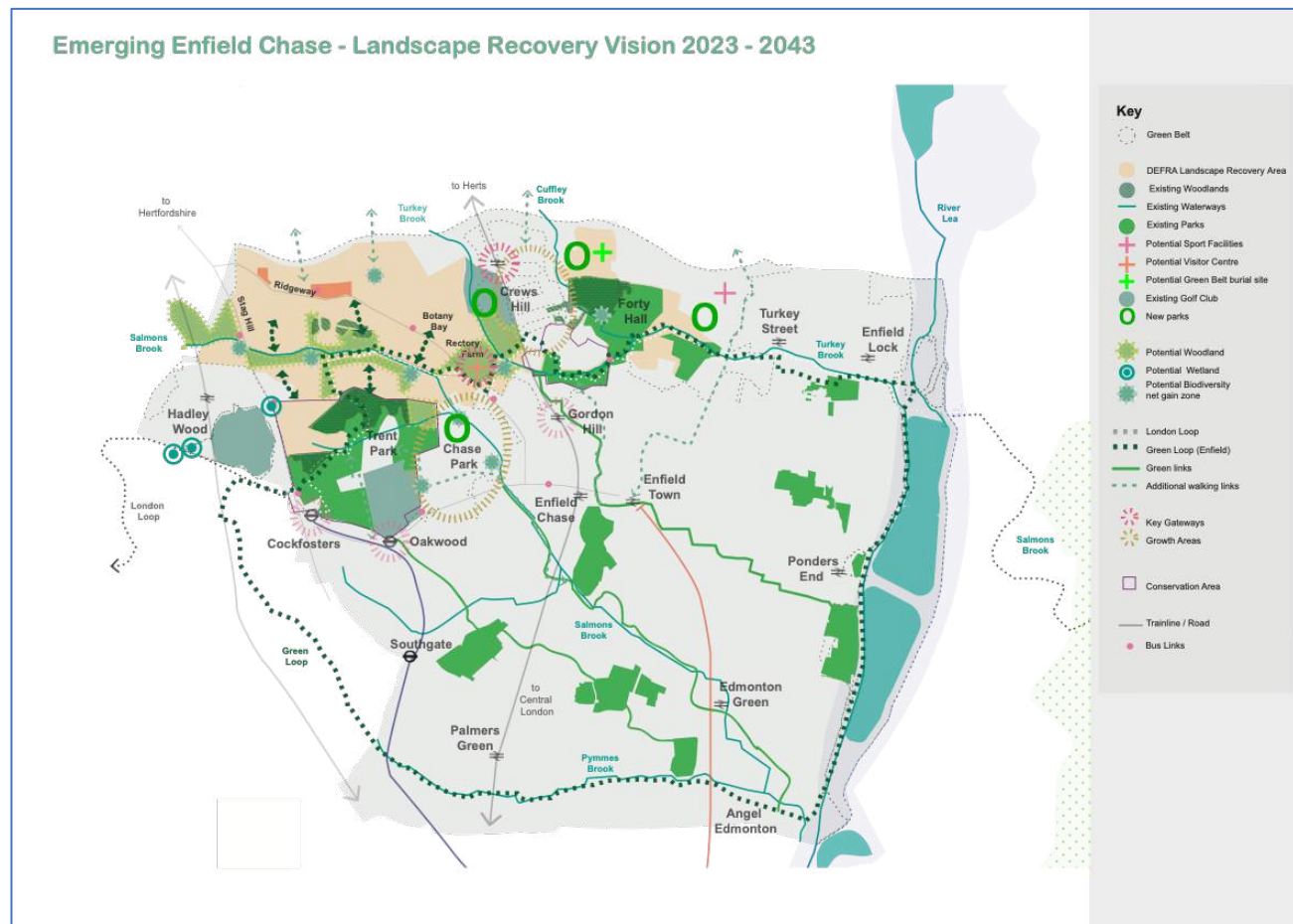


Figure 3.3: Indicative overview of Enfield Chase Landscape Recovery Project³²

³² London Borough of Enfield. April 2023. A Greener Enfield. Enfield Chase Vision.

3.6.6 The Council's Blue and Green Strategy identifies the need to connect population centres and transport nodes to the Landscape Recovery Project. SANG project selection therefore considered opportunities to provide these connections for new residents. **Figure 3.4** provides an extract from the Blue and Green Strategy which illustrates these potential connections.

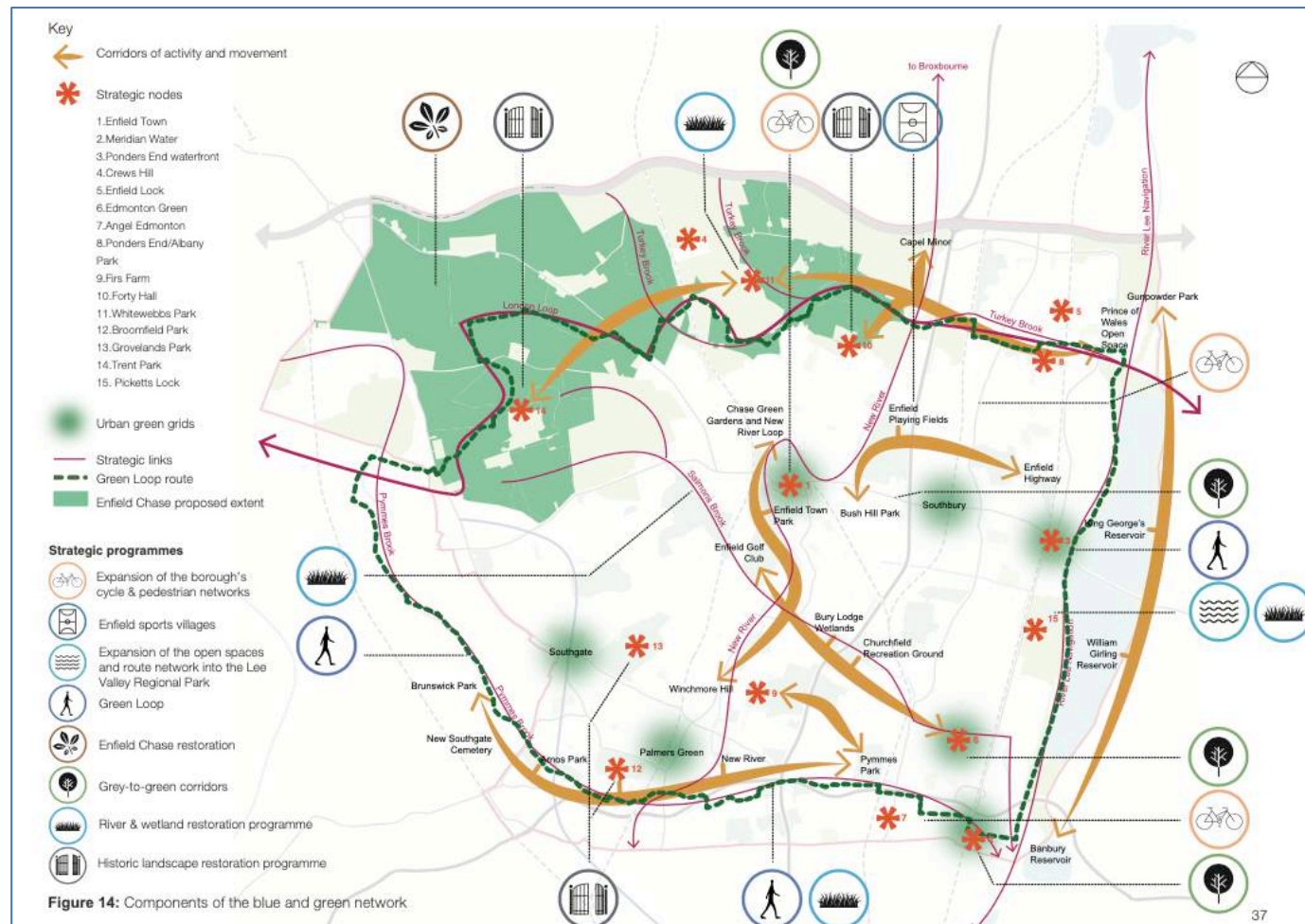


Figure 3.4: Extract from Enfield's Green and Blue Strategy³³

³³ Enfield Council. June 2021. Enfield's Blue and Green Strategy (2021 - 2031)

3.6.7 A Blue and Green Infrastructure Audit was undertaken in support of the Council's Blue and Green Strategy. This audit set standards (including a public open space standard of 2.15ha/1000) and provided an analysis of blue and green infrastructure provision across the whole borough, looking at quality, value, quantity and accessibility³⁴. Overall (when an average was taken) the audit showed that the open space standard is currently being met, but not evenly, with deficiencies to the east of the Borough. Selection of SANG projects therefore also took into consideration these inequalities in green space and aimed to provide enhanced recreational opportunities, and links between these, to achieve a viable recreational alternative to Epping Forest SAC for residents in the east of the borough.

3.6.8 In addition, the Blue and Green Strategy aims to ensure residents can access blue and green spaces within 15-minutes. This was therefore a consideration in SANG project selection and filtering.

3.6.9 Bespoke SANG guidelines were compiled on the basis of visitor survey data collated for Epping Forest SAC, taking into consideration Enfield's urban context, and drawing on Natural England's guidance in relation to other Habitats sites, in particular the Thames Basin Heaths Special Protection Area (SPA)³⁵. In addition to the above considerations, these guidelines also helped to inform SANG project selection and filtering.

3.6.10 In summary SANG selection criteria comprised the following:

- SANG must provide an attractive, realistic alternative green space for people who would otherwise have visited the SAC and therefore avoid impacts
- SANG should complement the Enfield Blue and Green Strategy
- SANG projects should enhance links to Enfield Chase which will provide a significant recreational opportunity for residents in Enfield.
- SANG projects should take into consideration deficits in access to green space across the borough
- SANG projects should aim to ensure residents can access blue and green space within 15-minutes

3.6.11 The shortlisted SANG projects were wide ranging in their function, type, size and location and comprised a series of open space enhancements and green links. Draft proposals were drawn up for each site and potential visitor uplift calculated for each. Natural England provided feedback on each of the shortlisted sites through site visits and meetings. The proposed SANG projects are set out in **Section 5**.

3.7 Calculating visitor uplift

3.7.1 Enhancements and interventions were identified for each SANG project to deliver attractive realistic alternative recreational spaces to Epping Forest SAC. Uplift was calculated for each SANG based on an assessment of the proposed interventions and the expected additional number of visitors that would be attracted to the SANG project following the proposed interventions.

³⁴ Land Use Consulting. 2020. Blue and Green Infrastructure Audit.

³⁵ Natural England. August 2021. Guidelines for Creation of Suitable Alternative Natural Greenspace (SANG).

3.7.2 This has been based on the technical expertise and experience of Enfield Council Officers supported by consultation with Natural England. Each proposed SANG project falls into one of the uplift categories below.

Table 3.1: SANG project uplift categories

Uplift	Range (per person visits)	Single-person visits equivalent (taking the median of the range)
Negligible	Up to 1	1
Low	Up to 34	18
Moderate	Up to 55	45
High	Up to 100	78
Very high	Up to 114	108

3.8 Assumptions and limitations

3.8.1 Visitor uplift categories are not based on visitor survey data. They have been compiled using the technical expertise of staff at Enfield Council in consultation with Natural England and draw on neighbouring LPA approaches.

3.8.2 HRA is a rigorous approach centred around the precautionary principle. Consequently, the methodology adopted to calculate the total visitor uplift as a result of the ELP, and uplift categories for each SANG project has applied a precautionary approach.

3.8.3 The methodology has used a higher-than-average occupancy rate for Enfield when compared to proposed housing types and uses the mid-range figure for each SANG project uplift category rather than the upper range. These factors mean that the total visitor uplift generated by the ELP will mitigate a worst-case recreation impact scenario in order to provide assurance over the delivery of effective SANG mitigation in Enfield.

Consented SANG

Pymmes Park, Enfiled (Credit: Lepus Consulting)



4 Consented SANG

4.1 Consented SANG

4.1.1 During the period over which a strategic approach to mitigation has been developing, a number of case-by-case SANG schemes have been developed in consultation with Natural England in order to allow development to come forward in the interim period. **Table 4.1** provides a summary of all consented SANG schemes to date.

4.1.2 The locations of these consented schemes are provided on **Figure 4.1**.

Table 4.1: Consented SANG schemes

Applications Reference	Scheme Name	Approximate straight-line distance from Epping Forest SAC (km)	Net homes
16/01197/RE3	Meridian Water Phase 1A	3.1	300
21/04742/FUL	Meridian Water Phase 1B	3.1	676
19/02718/RE3	Meridian Water Phase 2	3.1	2300
20/00788/OUT	Colosseum Retail Park	3.4	1,587
20/04187/OUT	Edmonton Green Shopping	3.4	1,440
22/03346/OUT	Joyce and Snells	4.8	1,105
21/04791/RM and 21/02076/OUT	Exeter Road	2.1	83
Total Homes			7,491

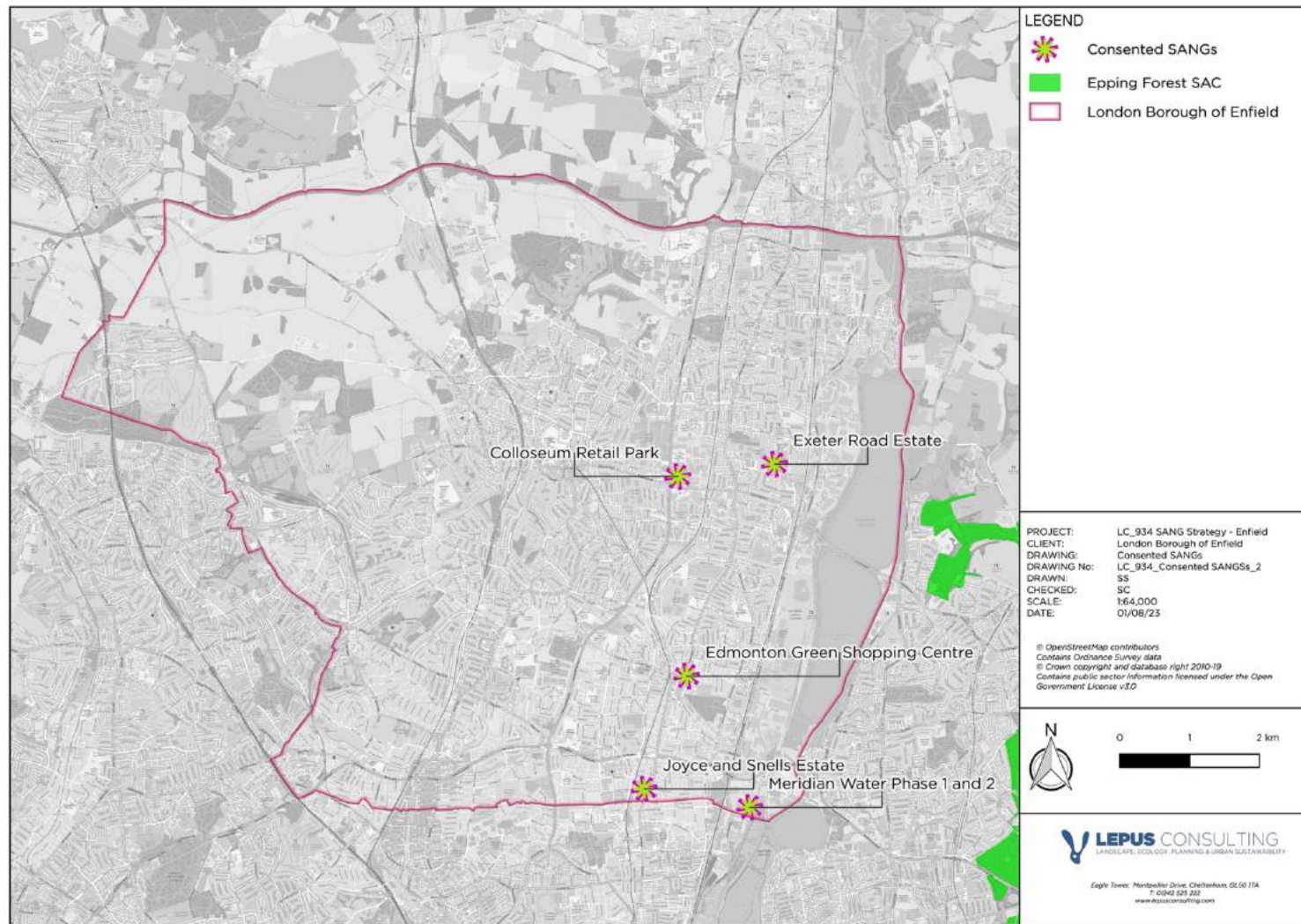


Figure 4.1: Approximate location of consented SANG schemes

Proposed SANG Projects

Pymmes Park, Enfield (Credit: Lepus Consulting)

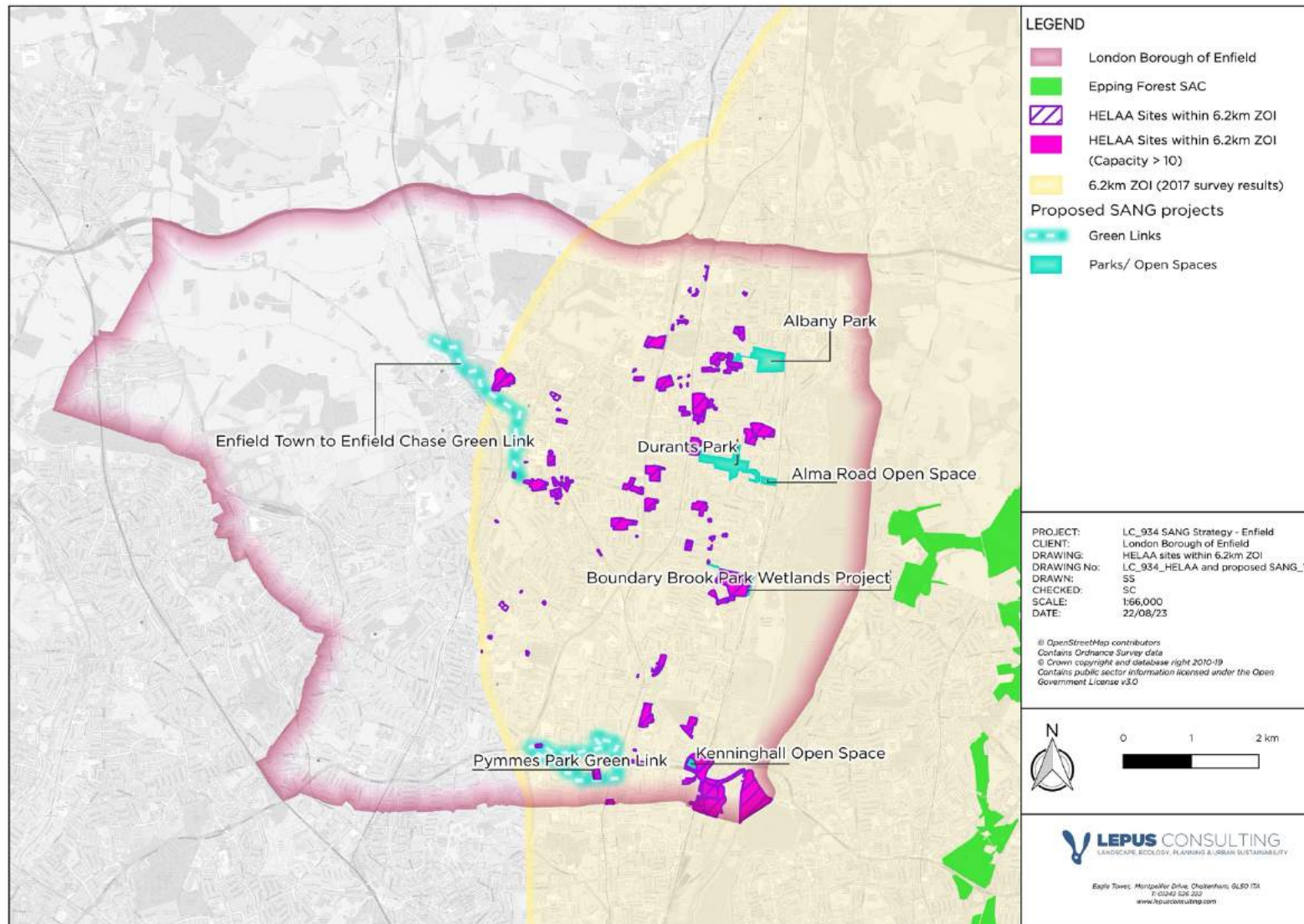


5 Proposed SANG Projects

5.1 Proposed SANG Projects

5.1.1 A range of SANG projects have been designed to meet the selection criteria set out in **Section 3**. These are detailed below and illustrated on **Figure 5.1**. The visitor uplift associated with each residential site allocation has been allocated to a SANG project based on the catchments. Windfall and developments of under 10 homes have been allocated to the Enfield Chase Green Link project. Photographs of all SANG project site locations are provided in **Appendix A**.

5.1.2 **Figure 5.2** illustrates how each proposed SANG project links into the existing green and blue provision across Enfield and the wider area. It also shows how they connect with the proposed re-wilding project at Enfield Chase Landscape Recovery Project and consented SANG schemes.



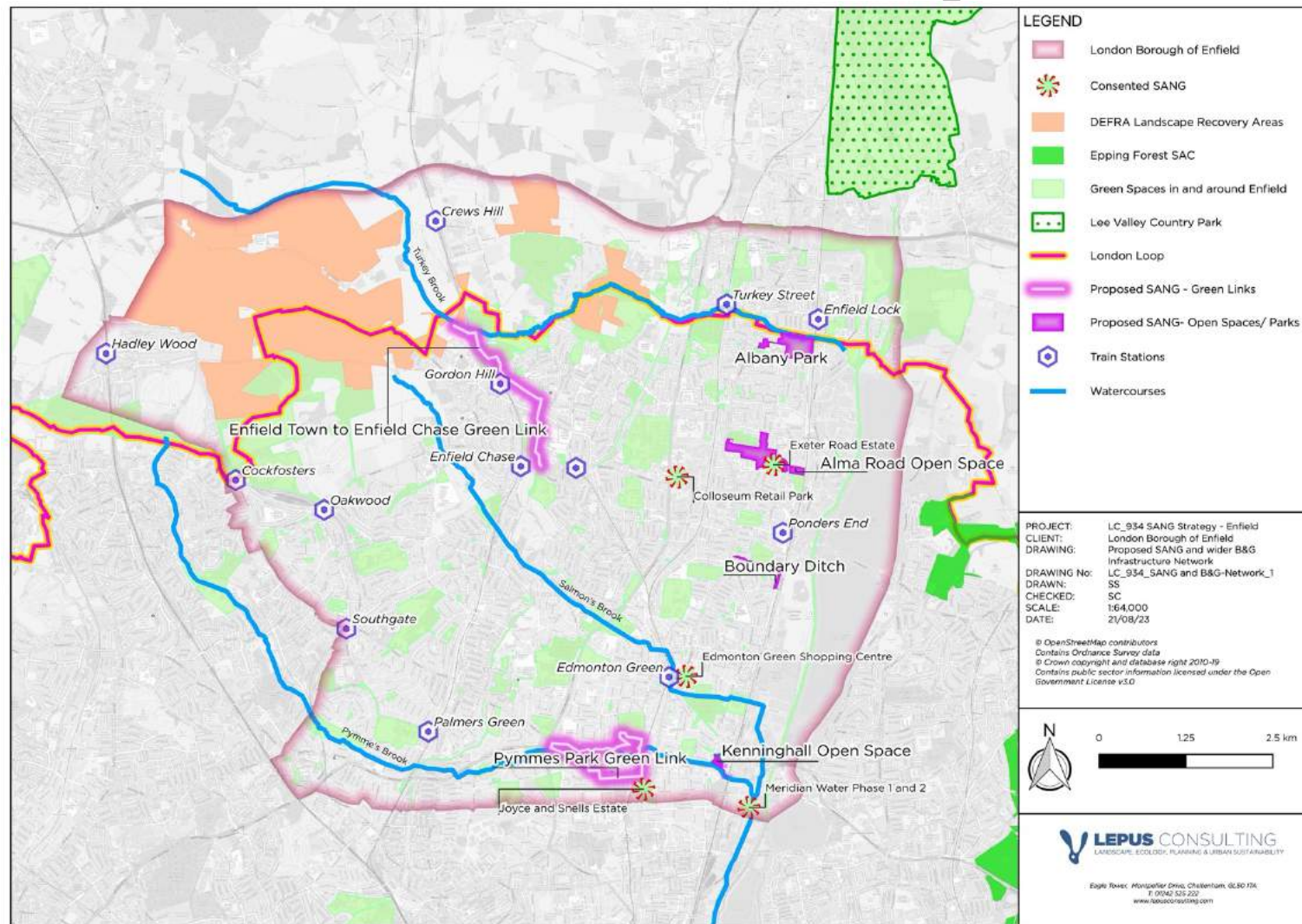


Figure 5.2: Proposed SANG projects showing links to wider green and blue infrastructure network in and around Enfield

5.2 Kenninghall SANG

Introduction

5.2.1 Kenninghall SANG project comprises an enhanced green space project with active travel links under the North Circular connecting to the consented SANG at Meridian Water development (see **Section 4**).

5.2.2 Kenninghall SANG is located on Kenninghall Open Space which is council owned and managed land covering approximately 1.85ha (see **Figure 5.1**). The project also includes a strip of land alongside and under the North Circular to provide an underpass. The land in this location is owned and maintained by Transport for London. The route will also pass over the Pymmes Brook and connect into the new development at Meridian Water.

5.2.3 The open space is bound to the south by the North Circular, to the west and north by Montagu Road and Conduit Lane and to the east by industrial land uses including a waste recycling centre.

Baseline

5.2.4 Deciduous woodland, a priority habitat, dominates the margins of the open space. There are a number of basic facilities on site including benches, dog waste bins and a paved circular path. The open space is bound on all sides by a raised bund. Access to the site is via the main entrance point in its northern corner, with two additional entrance / exit points to the west leading onto Montagu Road and to the east leading onto Kenninghall Road, which serves the adjacent industrial areas. There is no formal parking for the open space, although there is some informal parking along Kenninghall Road which is predominantly used by workers in the adjacent industrial area. There are no public rights of way (PRoW) within or adjacent to the open space. An informal path runs around the park linking the three entry / exist points.

5.2.5 There are no nature conservation designations coincident or adjacent to the open space. The agricultural land classification is urban in nature. Underlying bedrock comprises sedimentary deposits associated with 'Thames Group', with superficial geology comprising 'River-Terrace Deposits Sand and Gravel'³⁶. The open space is located within areas designated as Flood Zone 2 and 3. There are no features of archaeological importance within the open space³⁷.

5.2.6 The Green and Blue Infrastructure Audit³⁸ found the site was low quality but had high potential value - poor in condition and failing to achieve expected standards of maintenance and management. The current connection to Meridian Water crosses the North Circular at grade and offers a very poor pedestrian and cycling experience.

³⁶ <https://bgs.maps.arcgis.com/home/webmap/viewer.html?useExisting=1&layers=5e54c7ead72e4f1e80e3a89ef85effc1>

³⁷ Including listed buildings, scheduled monuments, conservation areas, heritage at risk and registered parks and gardens

³⁸ Land Use Consultants. 2020. Enfield Blue and Green Infrastructure Audit.

Enhancements

- 5.2.7 Development at Meridian Water is located to the south of the North Circular at this location and will be delivered through a phased approach. Existing phases of development at Meridian Water, totalling around 3,300 homes, include provision of consented SANG mitigation integrated with a number of new public open spaces across the site, including Pymmes Wood, Park Street, Station Square and Southern Park (see **Section 4**). Pymmes Wood will be situated immediately to the south of Kenninghall Open Space and the North Circular. Pymmes Wood proposals are ecological and biodiversity focused and include provisions for a circular walking route with seating around a network of woodland pockets, wetland meadows and an ecologically enhanced brook. Kenninghall SANG project will link directly into this woodland project and connect to existing green and blue infrastructure in the local area (see **Figure 5.2**). The project will comprise a new linking footpath under the North Circular, a footbridge over Pymmes Brook connecting to the Pymmes Wood project and other consented open spaces within the Meridian Water development. These connections will open up access to and from Meridian Water to Edmonton and provide users access to a network of paths across all agreed SANG projects.
- 5.2.8 Access to the site will be enhanced through the installation of interpretation features which will include a welcome point and site map. This will illustrate how the SANG sits within local and wider walking and cycling routes and links up to other green and blue infrastructure across Enfield. New and improved walking routes will be provided in a circular pattern around the site in between interesting planting and ecology features. The site will be cleared and planted to improve visibility and a feeling of safety. Waymarking will be included to link the site to Pymmes Brook in the south and Edmonton to the north. Dog waste and litter bins will be upgraded. New seating will be provided to allow visitors to enjoy the amenity of the site and rest. The scheme will be promoted to new residents through both leaflets and a dedicated SANG section on the Council's website. These will highlight local walking routes and illustrate how the SANG links up with walking and cycle trails within the wider area and be linked to QR codes on waymarking and signposting (see **Figure 5.2**).

Table 5.1: Kenninghall SANG Project Summary

Project:	Kenninghall SANG
Summary of Enhancements	New linking footpath under North Circular and over Pymmes Brook into consented SANG schemes at Meridian Water Footbridge over Pymmes Brook New footpaths around site Site interpretation boards Waymarking posts Clearance of vegetation, landscaping and planting to improve visibility, ecological diversity and appeal of parkland Benches Dog waste / litter bins Project promotion and advertisement Maintenance and inspection Monitoring
Uplift Category	Very High This project will create a new walking route to connect to new greenspaces including the consented SANG to the South and onwards to Angel Park and Edmonton to the North and is therefore considered to offer a very high uplift potential.
Range (visits per person per day)	Up to 116
Single person equivalent	108
Allocations within 1.2km catchment zone	CFS139, CFS264, CFS271, UPC1, UPC2, UPC6a, UPS21a
User Groups	Walkers. Dog walkers.

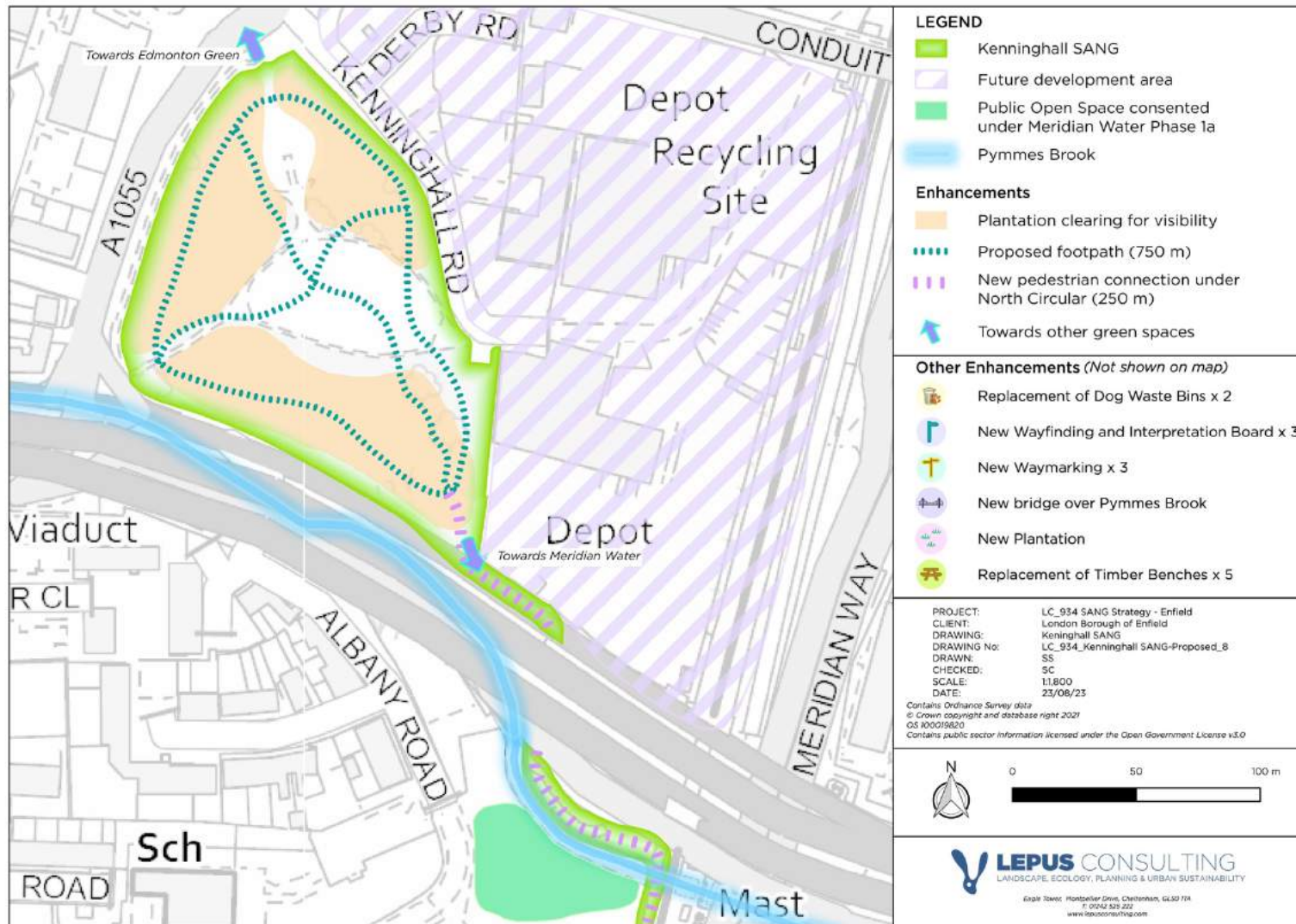


Figure 5.3: Kenninghall SANG Project Enhancements

5.3 Alma Open Space

Introduction

- 5.3.1 Alma Open Space SANG will comprises an enhanced green space project with active travel connections across Alma Road to Durants Park and the SANG wetland features and paths consented there under 21/04791/RM and 21/02076/OUT. Alma Open space is council owned and managed land which covers approximately 2.64 ha (see **Figure 5.1**). Durant's Park is also council owned and managed but covers a larger area.
- 5.3.2 The open space is bound to the west and north by residential areas, with allotments and some industrial units to the south and a railway running along its eastern boundary.

Baseline

- 5.3.3 There are no visitor facilities at Alma Open Space currently and the area is fenced off from the road. Soil has recently been brought to the site using excavated soil from the new wetlands and new trees planted, consented under Planning Reference 22/01498/RE4. Durants Park lies on the other side of Alma Road and provides a network of footpaths, playing fields, tennis courts and visitor facilities such as benches and play areas. There is no formal access to Alma Open Space and there is no parking, however informal parking is available along Alma Road. There are no PRow within the open space.
- 5.3.4 There are no nature conservation designations coincident or adjacent to the open space. The agricultural land classification is urban in nature. Underlying bedrock comprises sedimentary deposits associated with 'Thames Group', with superficial geology comprising 'River-Terrace Deposits Sand and Gravel'³⁹. The open space is not located within an area designated as Flood Zone 2 and 3. There are no features of archaeological importance within the open space.
- 5.3.5 The Green and Blue Infrastructure Audit⁴⁰ found the site was of low quality but had high potential value. Recently a mini-woodland has been created with dry wetland scrapes to create a richer natural habitat. The focus of these works is the area enclosed by the currently mown grass path which has an area of approximately 6000 sq.m. This has been installed to create undulations and shallow mounds in the middle of Alma Recreation Ground where the 'Mini Woodlands' is being established. The proposed creation of the series of shallow wetland scrapes will also provide flood storage for extreme rainfall events.

³⁹ <https://bgs.maps.arcgis.com/home/webmap/viewer.html?useExisting=1&layers=5e54c7ead72e4f1e80e3a89ef85effc1>

⁴⁰ Land Use Consultants. 2020. Enfield Blue and Green Infrastructure Audit.

Enhancements

- 5.3.6 The project will enhance the already consented rewilding Alma Open Space to improve visual and ecological diversity and integration of a network of waymarked footpaths. Signage and interpretation will be incorporated into a new main entrance point along Alma Road and around the site. In addition, visitor facilities such as benches and dog waste/ litter bins will be incorporated into the project. A new signalised traffic crossing will be provided between Alma Open Space and Durants Park to link these recreational facilities and their network of footpaths.
- 5.3.7 As part of the Exeter Road development at Durants Park, a series of consented SANG enhancements have been agreed. These include new footpaths around two newly created wetland systems which have recently been constructed by the Council to address flood water storage and water quality. These are located on the opposite side of Alma Road to Alma Open Space and the new road crossing will allow connection of the proposed SANG project with the consented SANG scheme (see **Section 4**).
- 5.3.8 The project will be promoted to new residents through both leaflets and a dedicated SANG section on the Council's website. These will highlight local walking routes and illustrate how the SANG links up with walking and cycle trails within the wider area and be linked to QR codes on waymarking posts and signage on the site (see **Figure 5.2**).

Table 5.2: Alma Open Space SANG Project Summary

Project:	Alma Open Space SANG
Summary of Enhancements	Re-wilding through planting of open space to improve visibility, ecological diversity and appeal Provision of new footpaths around site New entrance point Provision of new signalised crossing over Alma Road Site interpretation boards Waymarking posts Benches Dog waste / litter bins Project promotion and advertisement Maintenance and inspection Monitoring
Uplift Category	Very High This project will enable access to a very poorly used green space which currently has no paths or entrance and no natural features. It is therefore considered that it has a very high uplift potential.
Range (visits per person per day)	Up to 116
Single person equivalent	108
Allocations within 1.2km catchment zone	CFS166, CFS190, CFS217, CFS221, CFS242, CFS263, CFS266, CFS277, CFS304, SBC35, SBC36, SBC5
User Groups	Walkers. Dog walkers. People seeking to enjoy wildlife. Communities.

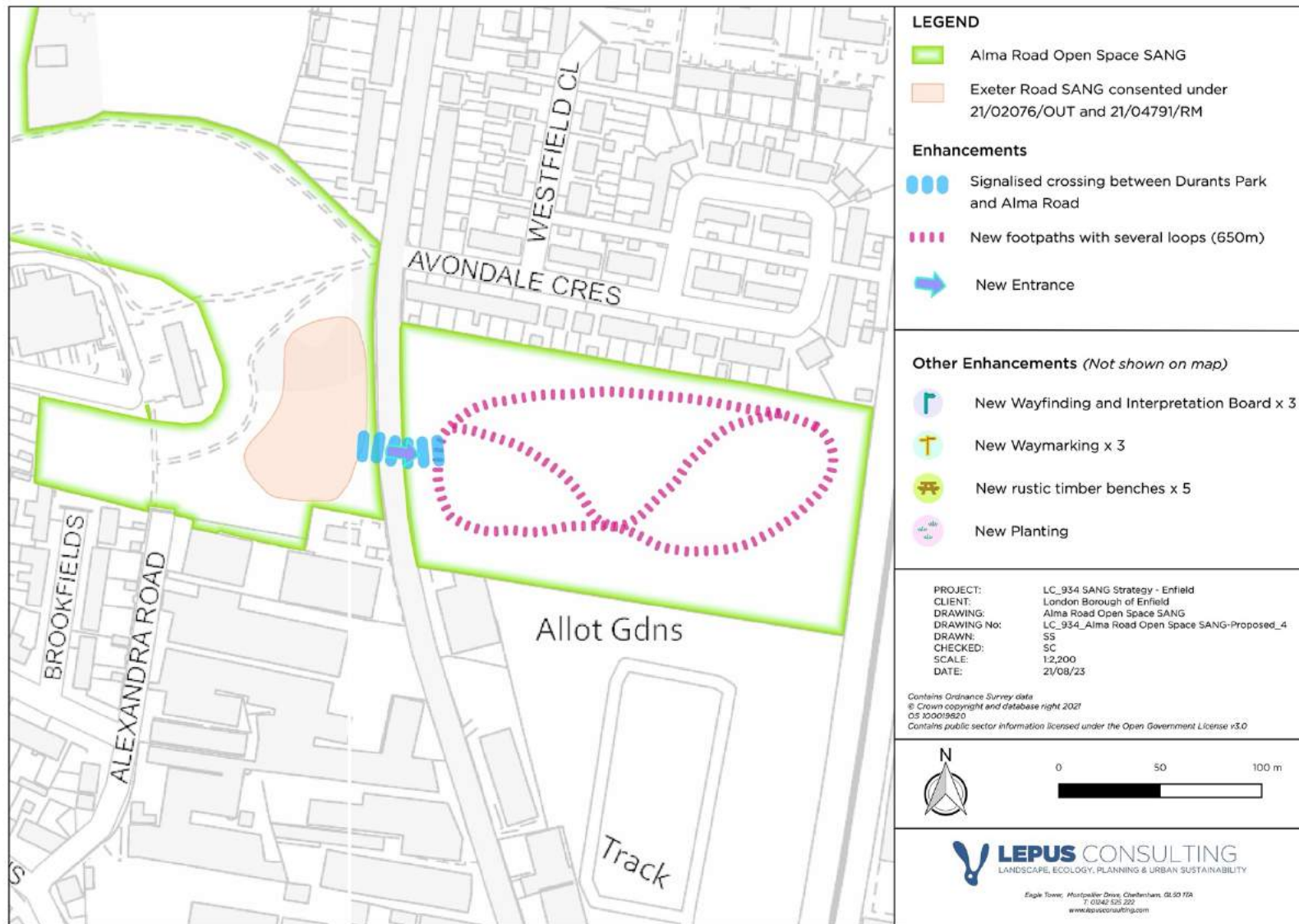


Figure 5.4: Alma Open Space SANG Project Enhancements

5.4 Albany Park

Introduction

5.4.1 The Albany Park SANG project comprises enhancements to the park through incorporation of walking and cycling routes alongside other visitor facilities. Albany Park is council owned and managed land, which covers approximately 16.43ha (see **Figure 5.1**).

5.4.2 Albany Park is located within a residential area, with the Ark John Keats Academy and Salmon Brook School to its south west. The Turkey Brook flows within its northern boundary and a railway line runs along its eastern boundary.

Baseline

5.4.3 The park contains a number of visitor facilities, including a Multi-Use Games Area (MUGA), seating, a surfaced path which runs around the perimeter of the park, play spaces, tennis courts and dog waste and litter bins. The park is bound to the south by a raised flood defence bund along which the perimeter footpath runs. Access to the site is via a number of entrances into the surrounding residential area and along the length of Bell Lane. There is no formal parking for the park, although there is informal parking within the surrounding residential areas. A PRow runs along the northern boundary of the park.

5.4.4 The Turkey Brook SINC, which is of Borough importance, runs along the Turkey Brook and the northern park boundary. It comprises the brook and surrounding wetland vegetation, bound by linear woodland either side. Work undertaken in support of the Blue and Green Strategy indicates that invasive species including Japanese knotweed (*Fallopia japonica*) and some areas of giant hogweed (*Heracleum mantegazzianum*) have been recorded within the SINC⁴¹. There are no other nature conservation designations coincident or adjacent to the park.

5.4.5 The agricultural land classification is urban in nature. Underlying bedrock comprises sedimentary deposits associated with 'Thames Group', with superficial geology comprising 'River-Terrace Deposits Sand and Gravel'⁴². The park is located within areas designated as Flood Zone 2 and 3. There are no features of archaeological importance within the park. The Green and Blue Infrastructure Audit⁴³ found the site to have both high quality and potential value.

⁴¹ Land Use Consultants. 2021. Review of Sites of Importance for Nature Conservation. An Addendum to the Enfield Blue and Green Strategy.

⁴² <https://bgs.maps.arcgis.com/home/webmap/viewer.html?useExisting=1&layers=5e54c7ead72e4f1e80e3a89ef85effc1>

⁴³ Land Use Consultants. 2020. Enfield Blue and Green Infrastructure Audit.

5.4.6 In 2021, the Albany Park restoration project was undertaken to restore the Turkey Brook, by breaking it out of its concrete channel and recreating a natural, sinuous river through the park. Two wetlands were also created along the southern edge of the park. Together these provide better access to nature and flood protection for nearby homes. In addition, the project provided an outdoor classroom on the banks of the brook and 300m of new footpaths. This Council and Thames21⁴⁴ project was jointly funded by the Mayor London, the Environment Agency and the Council. Along the Eastern Edge of the park an existing woodland forms a 60m wide buffer comprising around 1.75 ha of land separating the park from the Lea Valley Lines Railway.

Enhancements

5.4.7 The Albany Park SANG project aims to build on the Council restoration project by providing further enhancements within the park. These will be achieved through creation of new riverside and wetland walking routes. A second outdoor classroom and seating area will be provided alongside the wetland features to the south of the park to continue engagement of the local community with the park's natural environment. In addition, the project will deliver a new woodland nature trail / cycle path within the block of woodland which runs along the eastern park boundary with associated new planting. Interpretation and wayfinding will be incorporated into the scheme to improve the visitor experience and navigation around the site. This will also provide users with information on how the park links up to wider blue and green spaces across Enfield. The scheme will be promoted to new residents through both leaflets and a dedicated SANG section on the Council's website linked to QR codes on waymarking posts and signage on the site. These will highlight local walking routes and illustrate how the SANG links up with walking and cycle trails within the wider area (see **Figure 5.2**).

⁴⁴ <https://www.thames21.org.uk/>

Table 5.3: Albany SANG Project Summary

Project:	Albany SANG
Summary of Enhancements	River and wetland footpaths Nature trail / woodland bike trail Site interpretation boards Waymarking posts Clearance of vegetation, landscaping and planting to improve visibility, ecological diversity and appeal of the woodland area Benches Dog waste / litter bins Project promotion and advertisement Maintenance and inspection Monitoring
Uplift Category	Moderate This project will enhance an already existing green space and open up a significant new area comprising 2ha of woodland with new pathways. As such it is considered that it has a moderate uplift potential.
Range (visits per person per day)	Up to 55
Single person equivalent	45
Allocations within 1.2km catchment zone	CFS207, CFS265, CFS272, CFS278, CHC5, TUC1, TUC5, TUC6a, TUC7, TUC8
User Groups	Walkers. Dog walkers. Cyclists. People seeking to enjoy wildlife. Communities and school children.

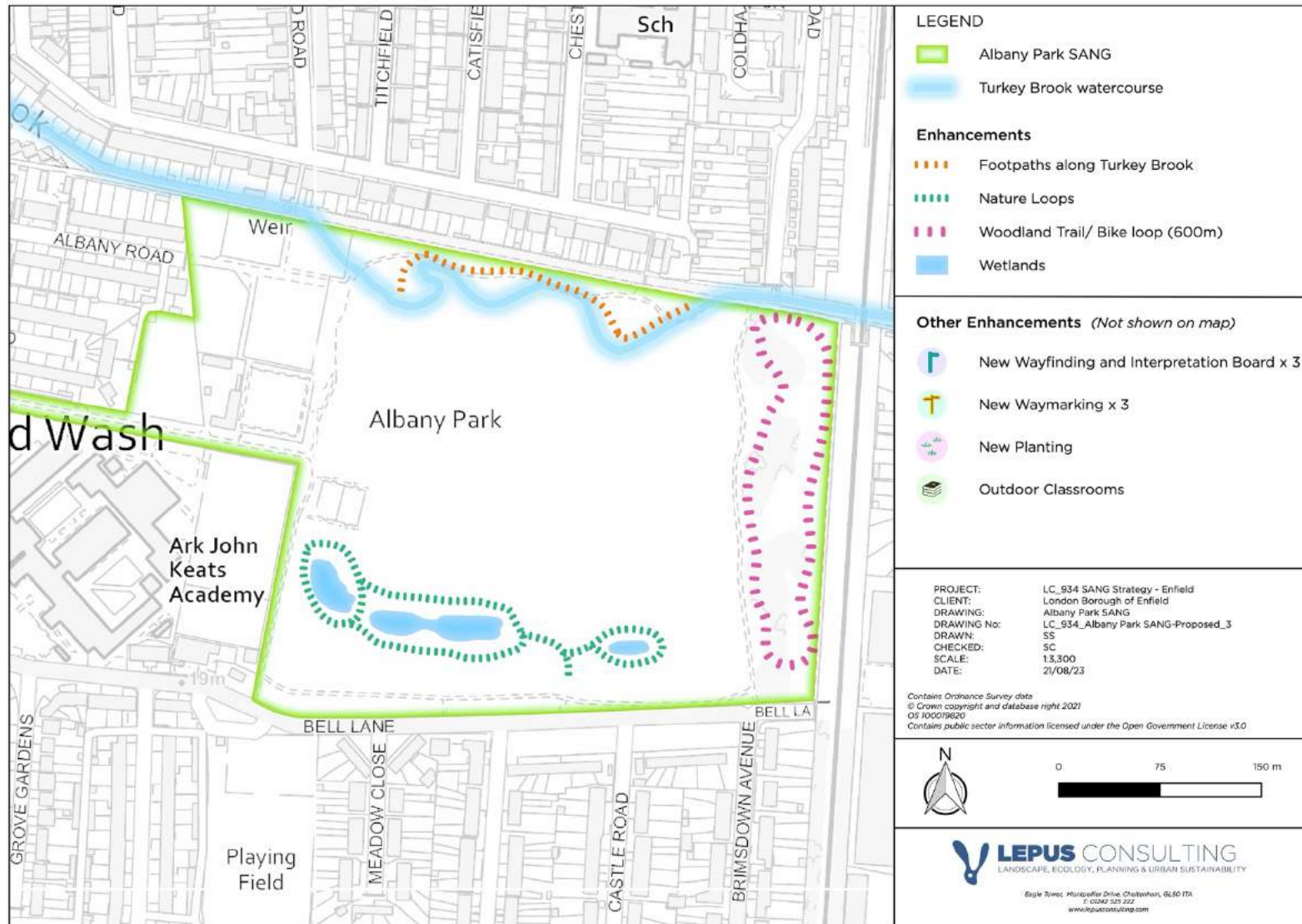


Figure 5.5: Albany Park SANG Project Enhancements

5.5 Boundary Park Wetland Project

Introduction

5.5.1 Boundary Park Wetland SANG Project comprises extensions and enhancements to an existing green link project and wetland restoration scheme along Boundary Ditch and into Charlton Road Park.

5.5.2 The project is located to the south of Ponders End and covers an area of approximately 1.18ha which is owned and managed by the Council (see **Figure 5.1**). The project runs along the southern bank of Boundary Ditch.

5.5.3 Allotments and residential areas are located to the north of the project with housing to its south. Hertford Road runs along the western boundary and the Lee Valley railway line to the east, beyond which is the Lee Valley Leisure Complex.

Baseline

5.5.4 Entrance to the site is via Hertford Road, with three smaller entrance points off Sandhurst Road to the south and from Gardiner Close to the north. Access is currently not possible along the Boundary Ditch itself from Gardiner Close into Charlton Road Park due to overgrown vegetation, although there is a connecting path at a lower elevation which runs along the back of the properties on Sandhurst Road.

5.5.5 The site is dominated by the Boundary Ditch watercourse which is designated as a Local SIN. The ditch comprises a narrow area of standing water, with densely vegetated banks treelined either side which are dominated by non-native Himalayan balsam (*Impatiens glandulifera*). There are no other ecological designations on site.

5.5.6 The agricultural land classification is urban in nature. Underlying bedrock comprises sedimentary deposits associated with 'Thames Group', with superficial geology comprising 'River-Terrace Deposits Sand and Gravel'⁴⁵. The project is located within areas designated as Flood Zone 2 and 3. There are no features of archaeological importance within the open space.

5.5.7 Enfield Council has secured funding and delivered improvements to a portion of the footpath along the Boundary Ditch from Hertford Road towards Cuckoo Hall and enhancements to the park entrance on Hertford Road which is currently hidden behind a car park. In addition, the Council has secured funding to construct a new wetland feature at the eastern end of the Boundary Brook in Charlton Road Park to help alleviate flooding and enhance amenity and biodiversity.

5.5.8 There is currently a small car park at the main entrance point on Hertford Road which will be turned into a main entrance space as part of the funded Council project. Following construction of this project there will be no formal parking, but informal parking is possible on the adjoining residential areas. Two PRowS cross the site in a north-south direction at Gardiner Close and connecting to Woodcote Close.

⁴⁵ <https://bgs.maps.arcgis.com/home/webmap/viewer.html?useExisting=1&layers=5e54c7ead72e4f1e80e3a89ef85effc1>

Enhancements

5.5.9 The Boundary Brook SANG project aims to build on the council funded project, by extending the length of the path the full length along the ditch to connect with Charlton Road Park, and creating two further enhanced entrance points into the scheme along Sandhurst Road to improve accessibility. Funding for these elements of the scheme have not been secured and therefore this will complement the existing work on the site. The scheme will be promoted to new residents through both leaflets and a dedicated SANG section on the Council's website. These will highlight local walking routes and illustrate how the SANG links up with walking and cycle trails within the wider area (see **Figure 5.2**) linked to QR codes on waymarking posts and signage on the site.

Table 5.4: Boundary Brook SANG Project Summary

Project:	Boundary Brook SANG
Summary of Enhancements	Extension to existing Boundary Brook footpath linking into Charlton Road Park Enhancement of two entrance points Site interpretation boards Project promotion and advertisement Maintenance and inspection Monitoring
Uplift Category	Low This project will involve small scale enhancements to enhance an existing scheme with connections to a specific development in the adjacent housing estate led by the council and as such has a low visitor uplift potential.
Range (visits per person per day)	Up to 34
Single person equivalent	18
Allocations within 1.2km catchment zone	CFS261
User Groups	Walkers. Dog walkers. Cyclists, People seeking to enjoy wildlife.

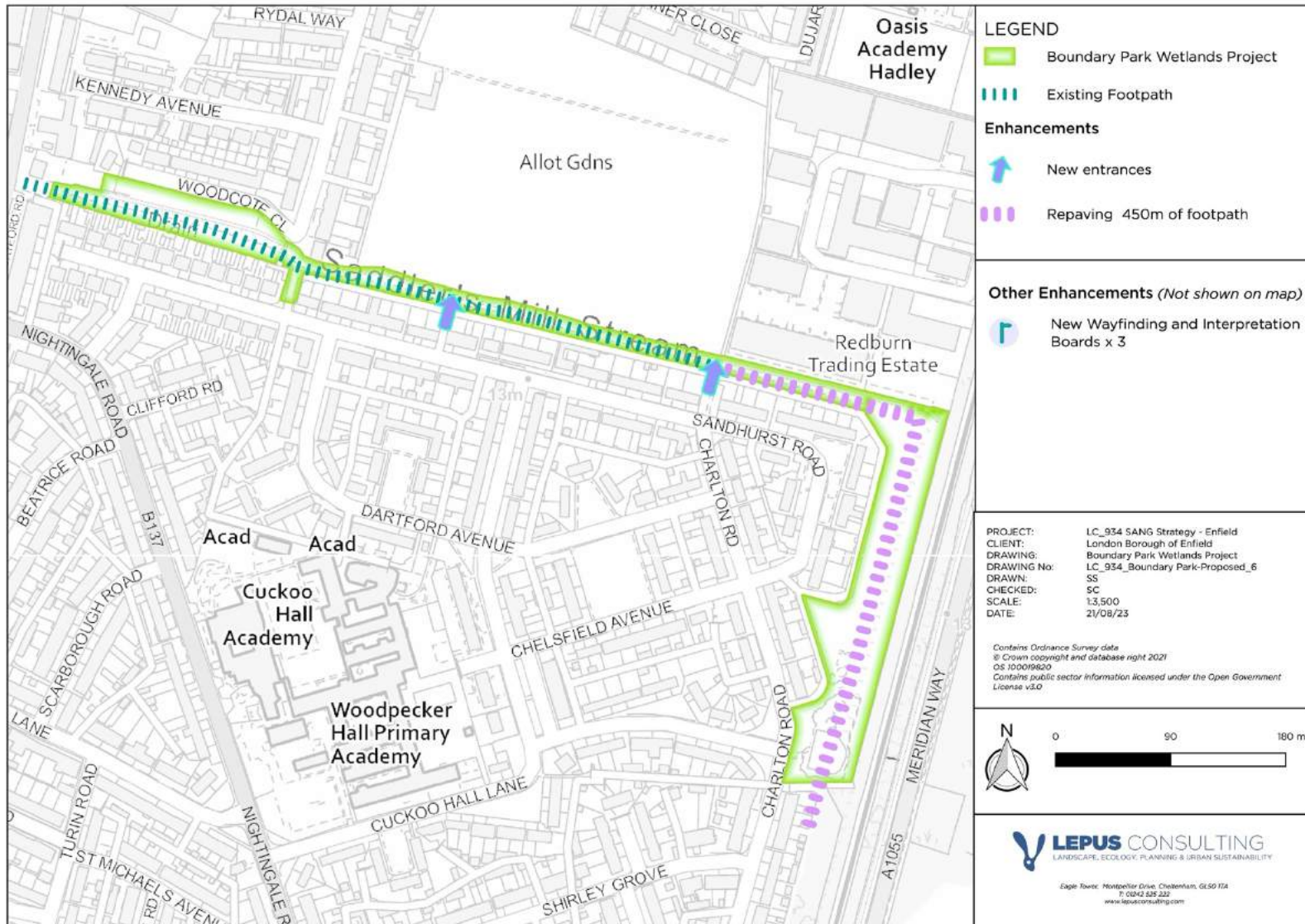


Figure 5.6: Boundary Brook SANG Enhancements

5.6 Pymmes Brook Green Link

Introduction

5.6.1 The Pymmes Brook Green Link SANG is a green link project which will enhance signage and connections along the Pymmes Brook Trail.

Baseline

5.6.2 The Pymmes Brook is a tributary of the River Lea joining it at Tottenham Hale (see **Figure 5.7**). The Pymmes Brook Trail is a 21km trail between Hadley Green to Tottenham Hale, connecting to the Lea Valley Walk. A stretch (as far as Arnos Park) runs alongside the Pymmes Brook, but thereafter the brook is only encountered intermittently as much of it passes through private land which is not open to the public. In its lower reaches sections of the brook have been culverted to address flood risk.

5.6.3 Pymmes Park sits on the Pymmes Brook Trail to the south of Edmonton. The Council has undertaken a large-scale project within the park to address water quality issues associated with Moore Brook which leads to the Pymmes Brook. This project involved the creation of wetland cells to capture dry weather flows and immobilise and filter pollutants from the stream. A main entrance point and footpaths have been created around the wetlands within Pymmes Park to allow users to benefit from the natural environment at this location.

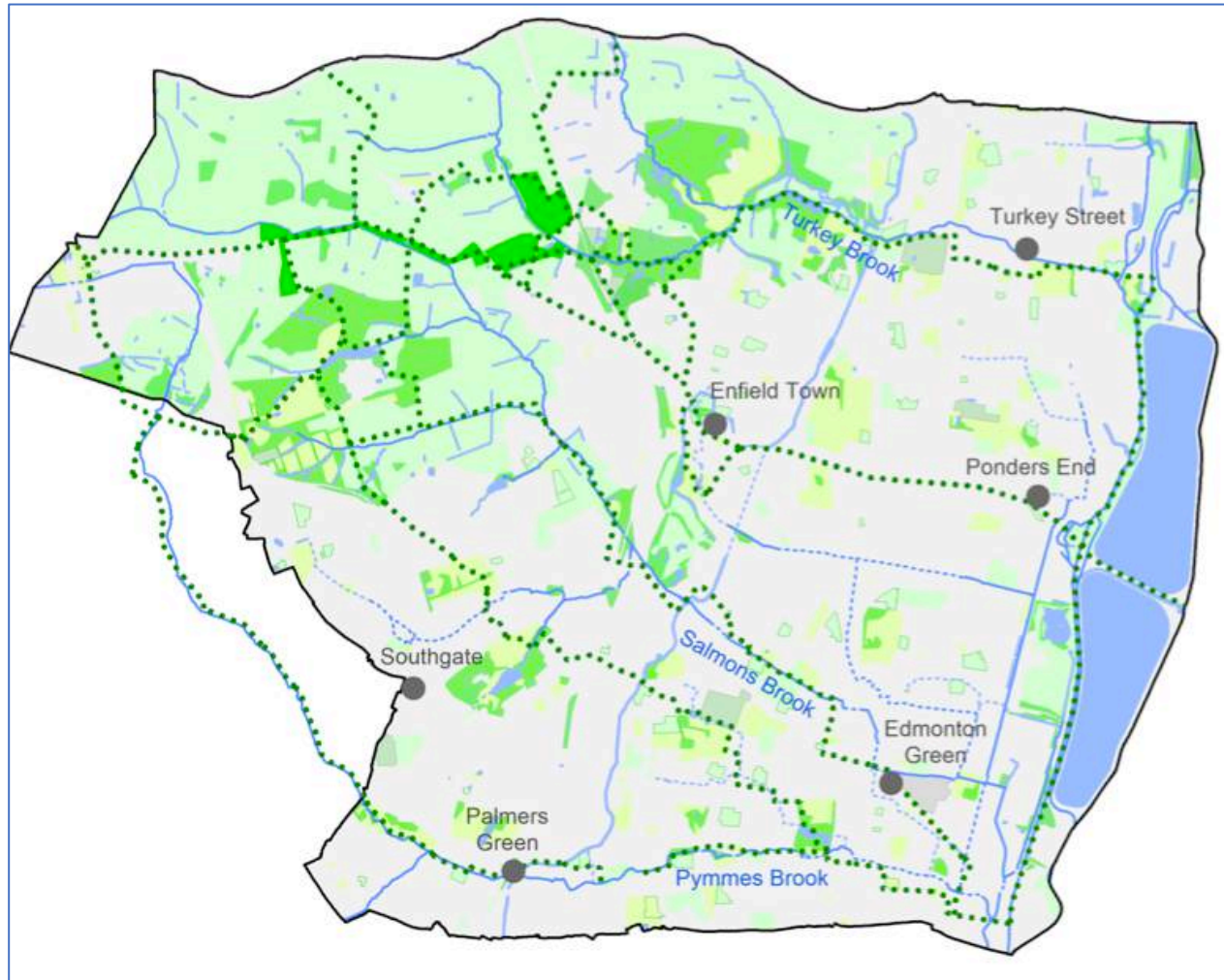


Figure 5.7: Pymmes Brook (Source: Enfield Council)

- 5.6.4 Pymmes Park and Pymmes Brook are both designated as a regional SINC. Work undertaken in support of the Blue and Green Strategy notes that Pymmes Park comprises a large recreation ground dominated by amenity grassland, with areas of standing water and woodland habitat. Pymmes Brook is primarily urbanised with canal like banks⁴⁶. There are no other nature conservation designations coincident or adjacent to the trail.
- 5.6.5 The agricultural land classification is urban in nature. Underlying bedrock comprises sedimentary deposits associated with 'Thames Group', with superficial geology comprising 'River-Terrace Deposits Sand and Gravel'⁴⁷. Sections of the trail run through areas designated as Flood Zone 2 and 3. There are no features of archaeological importance coincident with the trail. The Green and Blue Infrastructure Audit⁴⁸ found the park itself to have both high quality and potential value.
- 5.6.6 The Joyce and Snells consented SANG project is located on the Pymmes Trail and is comprised of an uplift of open space on the development site including diverse habitats, an ecological spine running through the development, green east west links, tree lined walks and pocket parks, rain gardens, new trees and podium planting (**Section 4**). In addition, the consented SANG project included an element of improved wayfinding and enhanced interpretation within Pymmes Park and from the Joyce and Snells development site to the Pymmes Brook Trail at Pymmes Park and / or Wilbury Way Wetlands (**Figure 5.8**).

⁴⁶ Land Use Consultants. 2021. Review of Sites of Importance for Nature Conservation. An Addendum to the Enfield Blue and Green Strategy.

⁴⁷ <https://bgs.maps.arcgis.com/home/webmap/viewer.html?useExisting=1&layers=5e54c7ead72e4f1e80e3a89ef85effc1>

⁴⁸ Land Use Consultants. 2020. Enfield Blue and Green Infrastructure Audit.



Figure 5.8: Joyce and Snells development consented SANG links to Pymmes Park

Enhancements

- 5.6.7 The Pymmes Brook Green Link SANG project aims to further enhance signposting and waymarking along the Pymmes Brook Trail and integrate this with features which have been consented as part of the Joyce and Snell SANG while tying in additional development sites in the area including the North Middlesex Hospital Site which is adjacent but not connected to the agreed SANG route. The project will also connect the trail to wider areas of blue and green infrastructure across Enfield through signage and waymarking. The scheme will be promoted to new residents through both leaflets and a dedicated SANG section on the Council's website. These will highlight local walking routes and illustrate how the SANG links up with walking and cycle trails within the wider area and link up with a network of QR codes promoting green spaces (see **Figure 5.2**).

Table 5.5: Pymmes Brook Trail SANG Project Summary

Project:	Pymmes Brook Trail SANG
Summary of Enhancements	Site interpretation boards Waymarking posts Benches Project promotion and advertisement Maintenance and inspection Monitoring
Uplift Category	Low This project will involve small scale enhancements to tie ELP sites into a consented SANG network in the area and as such is considered to have a low visitor uplift potential.
Range (visits per person per day)	Up to 34
Single person equivalent	18
Allocations within 1.2km catchment zone	CFS165, CFS186, CFS218, CFS237, CFS276, LOC1
User Groups	Walkers. Dog walkers. Cyclists.

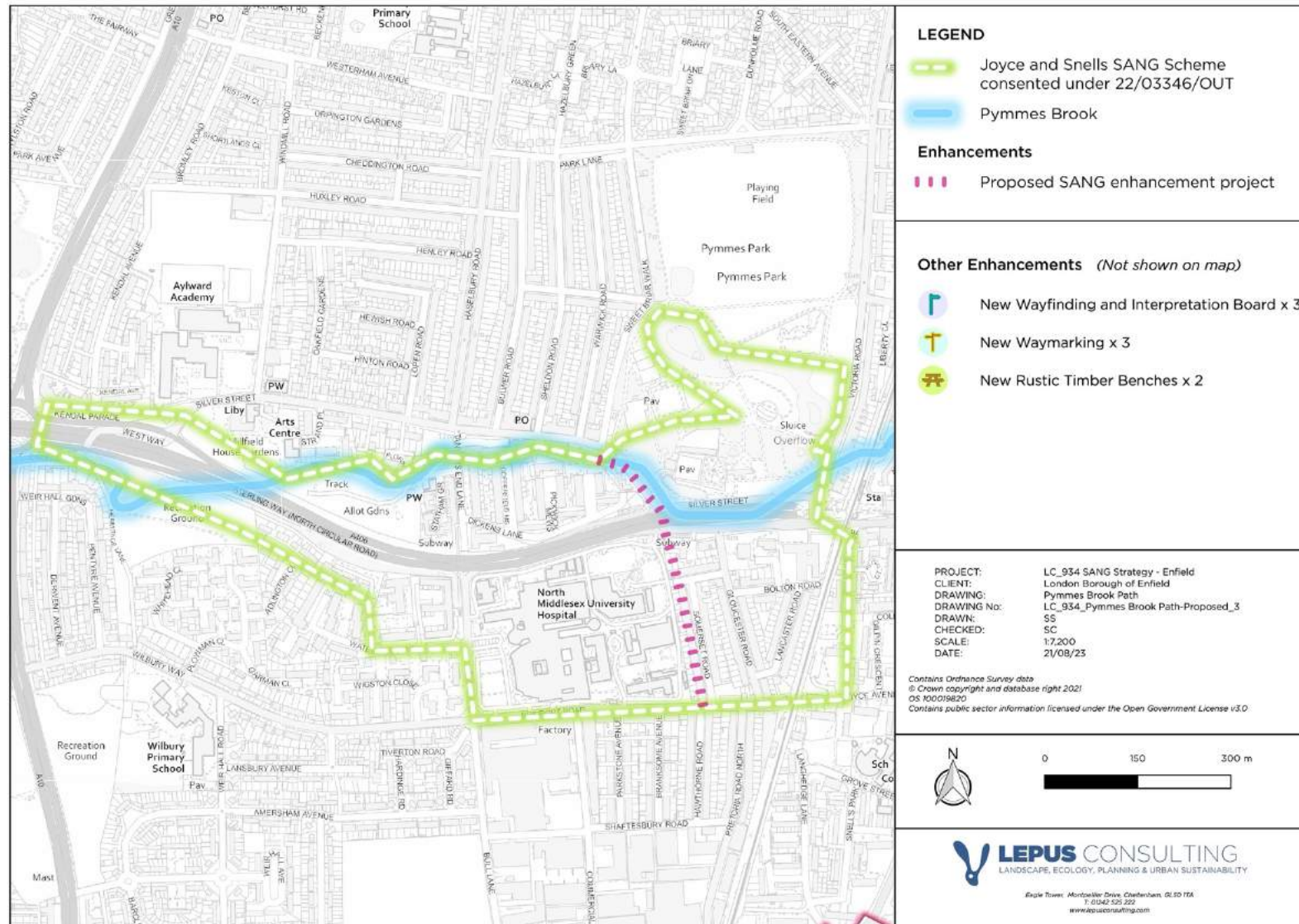


Figure 5.9: Pymmes Brook Trail SANG Project Enhancements

5.7 Enfield Chase Green Link

Introduction

5.7.1 The Enfield Chase Green Link SANG is a green link project which will enhance signage and connections from Enfield Town Centre to the Enfield Chase Landscape Recovery Project (as set out in **Section 3.6**). This project fulfils a key aim of the Enfield Epping Forest SAC Recreation Mitigation Strategy ‘*SANG projects should enhance links to Enfield Chase which will provide a significant recreational opportunity for residents in Enfield*’.

Baseline

5.7.2 As noted in **Section 3.6**, Enfield Chase Landscape Recovery Project will provide a realistic recreational alternative to Epping Forest SAC.

5.7.3 A number of schemes have already been delivered as part of the Enfield Chase Landscape Recovery Project which form the baseline for the new SANG project which will link into these areas:

- London Loop Path – converting a 3.3km long narrow muddy footpath from Rectory Farm onwards to Trent Country Park into a 3m wide cyclable gravel path running along Salmon’s Brook - completed and fully funded Greater London Authority (GLA)
- Creation of at least 60 hectares of publicly accessible land and reforestation with 135,000 trees around Rectory Farm – completed and fully funded by Enfield Council and Forestry England
- Creating 50 ponds and wetland scrapers to provide valuable habitats and nature recovery – completed and fully funded (Environment Agency)

5.7.4 Funding has also been secured (in full or partially) for a number of projects in the Green Belt which are required to deliver elements of the Enfield Chase Landscape Recovery Project and connect this into a wider green infrastructure network being delivered as part of the ELP. These include:

- Link from Rectory Farm under Rendlesham Viaduct to Gordon Hill Railway Station – fully funded by GLA Green and Resilient Spaces Fund
- Salmons Brook River Restoration project – expected to be fully funded (Environment Agency) subject to planning permission
- Rectory Farm Visitors Centre to include mountain biking trail centre, wild swimming lake, art trail, performance space and play features – full funding likely required from nearby development projects subject to planning permission
- Further foot and cycle paths - £3,500,000 – full funding likely required from nearby development projects subject to planning permission
- Creation of 23 hectares of publicly accessible land as a natural burial site at Sloeman’s Farm – scheme committed by Enfield Council⁴⁹
- Former Whitewebbs Golf Course - Restoration 20 ha of council-owned golf course into publicly accessible parkland and wildflower meadows and creation of habitat

⁴⁹ <https://governance.enfield.gov.uk/ielssueDetails.aspx?Ild=59175&Opt=3>

bank at Whitewebbs Wood- lease agreed by Enfield Council to Tottenham Hotspurs Football Club with provisions for enhancement works subject to planning permission⁵⁰

- 5.7.5 Enfield Council has been awarded GLA funding to create 50ha of publicly accessible woodland by 2025, adding to and extending the woodland created previously with the support of the Mayor. As set out in **Section 3.6**, Enfield's vision is to restore the landscape of the former Enfield Chase royal hunting forest, which now predominantly consists of Council-owned arable farmland. Large-scale woodland creation is a key element of the wider project, which is being developed in phases. Through previous phases, a total of 80ha of woodland has been created. There will be several distinctive gateways into the re-wilding project including Crews Hill and Gordon Hill Stations, Rectory Farm and Botany Bay to the east where connectivity is currently very limited. The funding will also improve connectivity to the Chase by creating new paths, upgrading existing paths and adding wayfinding, improving accessibility for pedestrians and cyclists to the newly restored woodland from Gordons Hill Station to Rectory Farm.
- 5.7.6 The Enfield Chase Green Link Project passes through a Regional SINC – Enfield Loop of the New River. This a canalised stretch of standing water with an adjacent footpath, which was formerly connected to the New River and which runs through the playing fields of Enfield Grammar School and then alongside Gentleman's Row through the centre of Enfield. There are multiple grade II listed buildings close to the green link as well as a few grade II* listed buildings. The agricultural land classification is urban in nature. Underlying bedrock comprises sedimentary deposits associated with 'Thames Group', with superficial geology comprising 'River-Terrace Deposits Sand and Gravel'⁵¹.

Enhancements

- 5.7.7 The Enfield Chase Green Link SANG project will improve connectivity to the Enfield Chase Landscape Recovery Project and wider Green Infrastructure Network on the edge of London. These include the London Loop and wider links to Trent Park in the West and Hilly Fields, Whitewebbs Park and Forty Hill to the East, as well as new areas of publicly accessible open space being created as part of the projects noted above and as part of the development of new homes at Crews Hill and Chase Park.
- 5.7.8 The project will comprise a major upgrade of the existing street-based pedestrian and cycling routes from Enfield Town Centre to Gordon's Hill Station with improved wayfinding, crossings and a coloured line guiding residents and visitors to Gordon Hill. From there, it will link into an upgraded stretch route, already funded by the GLA Green and Resilient Spaces Fund, from Gordon Hill Railway Station to Rectory Farm. From Gordon Hill station, the route will run North through Lavender Hill and pass under the Rendlesham Viaduct along Turkey Brook, which will form a key entrance point into the Enfield Chase Landscape Recovery Project, and on to the Rectory Farm visitor centre being proposed as part of the ELP.

⁵⁰https://governance.enfield.gov.uk/documents/s99514/CURRENT%20HRD2324_016%20Decision%20to%20Lease%20Land%20at%20White%20webbs%20Park%20Golf%20Course%20Part%201.pdf

⁵¹ <https://bgs.maps.arcgis.com/home/webmap/viewer.html?useExisting=1&layers=5e54c7ead72e4f1e80e3a89ef85effc1>

- 5.7.9 Footpaths will be distinguished through the use of coloured line marking and three new signalised crossings will be incorporated at Parsonage Lane, Chase Side and Gordon Hill to enhance pedestrian access, while new street planting pockets will be provided to enhance and further demarcate the route. The 1.1km route will also offer opportunities to access this new natural greenspace destination and walking route both within and outside Enfield by directly connecting Enfield Town from the existing New River Walk at Parsonage Gardens, to Gordon Hill Station and onwards to Enfield Chase Gordon Hill Railway station. Waymarking posts along the route will include QR codes which will provide users with an introduction to Enfield Chase’s history and environment today as they move along the route towards the Enfield Chase Landscape Recovery Project.
- 5.7.10 The scheme will be promoted to new residents through both leaflets and a dedicated SANG section on the Council’s website. These will highlight local walking routes and illustrate how the green link connects with walking and cycle trails within the wider area (see **Figure 5.2**)

Table 5.6: Enfield Chase Green Link SANG Project Summary

Project:	Enfield Chase Green Link SANG
Summary of Enhancements	Site interpretation boards Waymarking posts Benches Project promotion and advertisement Maintenance and inspection Monitoring
Uplift Category	High This project will provide a significant active transport connection from Enfield Town to the Landscape Recovery Project at Enfield Chase, linking sustainable transport hubs (railway stations) into a gateway into the Chase which will in itself deliver a realistic alternative recreational designation to Epping Forest SAC. As such this project has a high visitor uplift potential.
Range (visits per person per day)	Up to 116
Single person equivalent	108
Allocations within 1.2km catchment zone	BUC1, CFS178, CFS191, CFS201, CFS239, CFS260, CFS267, CFS274, GRC1, GRC12, GRC13, GRC3, GRC5, SBC2, SBC4 Also includes an allowance for windfall and allocations of less than 10 homes
User Groups	Walkers. Dog walkers. Cyclists.

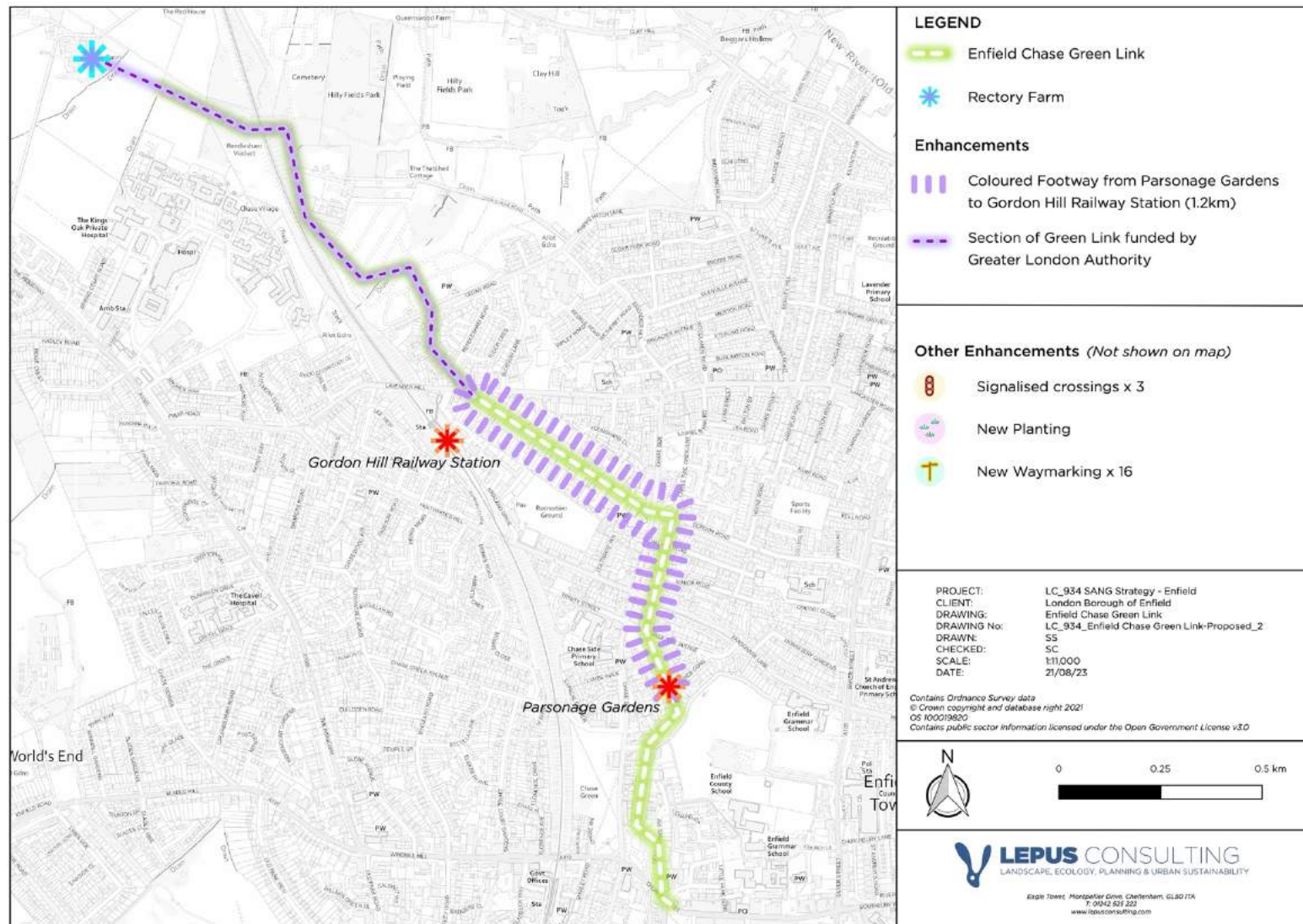


Figure 5.10: Enfield Chase Green Link SANG Project Enhancements

5.8 Total Visitor Uplift Capacity

5.8.1 When taken together all proposed SANG projects provide a combined visitor uplift capacity of 405 visitors per day. This is based on the mid-range figure for each project.

5.9 Bespoke SANG

5.9.1 Whilst the requirement for bespoke SANG does not form part of this Strategy, larger development may choose to provide bespoke SANG either on-site or, in certain circumstances, off-site. It is expected that this SANG would be delivered in advance of the occupation of dwellings and in perpetuity.

5.9.2 A developer may wish to offer the land to the Council (with an in-perpetuity maintenance contribution), another public body or set up a management company or community trust (all subject to appropriate ongoing funding). In this case the Council will need assurance that such an organisation has the necessary skills and resources to maintain the open space and that it will remain in existence to achieve this in perpetuity.

5.9.3 Bespoke SANG would be considered on a case-by-case basis, in agreement with the Council and Natural England and in accordance with the Habitats Regulations.

SANG Catchments

Enfield Chase, Enfield (Credit: Lepus Consulting)



6 SANG Catchments

6.1 Proposed residential development

6.1.1 **Table 6.1** lists all residential sites which allocate additional residential units, and which are located within the Epping Forest SAC Zol. The location of each of these allocations is shown on **Figure 6.1**.

6.2 SANG project catchments

6.2.1 Aim 2 of Enfield's Blue and Green Strategy is to provide blue and green infrastructure that can be reached in 15 minutes. According to the 2021 National Statistics data 31% of all households in Enfield have no access to either a car or van⁵², which compares to an average of 22% across Great Britain⁵³. A 15-minute walking distance is reflected by 1.2km. This distance has therefore been used as a SANG catchment. Taking into consideration car ownership levels in Enfield, consideration has also been given to accessibility by other forms of sustainable transport including active travel and public transport to allow delivery of 15-minute neighbourhoods. Policy DM RE2 of the ELP – Improving access to the countryside and green corridors – notes that development within a five-minute walk or 400 metre radius from a strategic green link (as shown on the Policies Map) must integrate with the wider footpath / cycle network. Integration of SANG into Enfield's active travel network has therefore also been a guiding factor when applying catchments.

6.2.2 The Enfield Chase Green Link aims to improve connections to the Enfield Chase Landscape Recovery Project. As set out in **Section 3.6**, this project will provide a diverse range of visitor facilities and represents a realistic alternative to Epping Forest SAC for residents within Enfield. It will also be accessible via a number of green links and railway stations which connect with the Enfield Green Link SANG project, including Enfield Town Centre and Gordon's Hill railway stations. As such, a larger catchment of 5km has been applied to this SANG project to represent its connectivity to sustainable forms of transport and its link into the Enfield Chase Landscape Recovery Project which will cover 1,000ha of farm land and provide a range of visitor facilities and therefore have a wide visitor draw.

6.2.3 Any development seeking to deliver 10 or more net new residential dwellings (or equivalent) must be located within (or on the edge of) the catchment of a SANG project with capacity. Smaller development proposals for up to 9 net new residential dwellings (or equivalent) are not restricted to catchment areas for SANG.

⁵² Office of National Statistics. Census 2021. Available at: <https://www.ons.gov.uk/census/maps/choropleth/housing/number-of-cars-or-vans/number-of-cars-5a/no-cars-or-vans-in-household?lad=E09000010> [Date Accessed: 10/07/23]

⁵³ Department for Transport. 2022. National Travel Survey 2021. Household car availability and trends in car trips. Available at: <https://www.gov.uk/government/statistics/national-travel-survey-2021/national-travel-survey-2021-household-car-availability-and-trends-in-car-trips#:~:text=Household%20car%20access,-Chart%207%3A%20Percentage&text=The%20proportion%20of%20households%20without,every%2010%20households%20in%20England.> [Date Accessed: 10/07/23]

6.2.4 The location of SANG projects with catchments applied are shown in **Figure 6.1**. **Table 6.1** shows how residential sites within the Local Plan have been allocated to each SANG project based on a catchment led approach. Sites under 10 homes and windfall development has been allocated to the Enfield Chase Green Link project due to its wider catchment zone.

Table 6.1: Residential sites within SANG project catchments

Regulation 19 Allocation	Visitor Uplift from HELAA Site	SANG Project
CFS207	2.55	Albany Park
CFS265	7.20	Albany Park
CFS272	2.70	Albany Park
CFS278	1.26	Albany Park
CHC5	8.73	Albany Park
TUC1	0.57	Albany Park
TUC5	0.45	Albany Park
TUC6a	0.54	Albany Park
TUC7	0.51	Albany Park
TUC8	0.30	Albany Park
CFS261	1.77	Boundary Brook Park Wetlands Project
CFS166	15.64	Alma Road Open Space
CFS190	0.30	Alma Road Open Space
CFS217	15.97	Alma Road Open Space
CFS221	0.45	Alma Road Open Space
CFS242	18.16	Alma Road Open Space
CFS263	0.42	Alma Road Open Space
CFS266	5.97	Alma Road Open Space
CFS277	0.87	Alma Road Open Space
CFS304	0.33	Alma Road Open Space
SBC35	26.05	Alma Road Open Space
SBC36	19.39	Alma Road Open Space
SBC5	1.56	Alma Road Open Space
BUC1	0.45	Enfield Chase Green Link
CFS178	1.41	Enfield Chase Green Link
CFS191	3.42	Enfield Chase Green Link
CFS201	0.87	Enfield Chase Green Link
CFS239	0.60	Enfield Chase Green Link
CFS260	2.97	Enfield Chase Green Link
CFS267	0.69	Enfield Chase Green Link
CFS274	1.08	Enfield Chase Green Link
GRC1	3.99	Enfield Chase Green Link
GRC12	9.87	Enfield Chase Green Link
GRC13	2.37	Enfield Chase Green Link
GRC3	2.34	Enfield Chase Green Link
GRC5	0.30	Enfield Chase Green Link
SBC2	2.40	Enfield Chase Green Link
SBC4	9.09	Enfield Chase Green Link
CFS139	24.46	Kenninghall Open Space
CFS264	1.17	Kenninghall Open Space
CFS271	0.36	Kenninghall Open Space
UPC1	45.23	Kenninghall Open Space
UPC2	24.58	Kenninghall Open Space
UPC6a	10.68	Kenninghall Open Space
UPS21a	1.50	Kenninghall Open Space
CFS165	7.80	Pymmes Brook Green Link
CFS186	0.30	Pymmes Brook Green Link
CFS218	0.30	Pymmes Brook Green Link
CFS237	3.60	Pymmes Brook Green Link

Regulation 19 Allocation	Visitor Uplift from HELAA Site	SANG Project
CFS276	0.36	Pymmes Brook Green Link
LOC1	4.38	Pymmes Brook Green Link
Small Sites	3.60	Enfield Chase Green Link
Windfall	53.18	Enfield Chase Green Link
Total Visitor Uplift Generated	355.093	

6.2.5 As set out in **Section 5.8**, all proposed SANG projects will provide a potential visitor uplift capacity for an additional 405 visitors per day. This will accommodate the visitor uplift forecast to be generated by residential sites which will come forward thorough the ELP.

6.2.6 The approach taken to calculate visitor uplift is precautionary in nature. It does not take into consideration poor access connections between Enfield Borough and Epping Forest SAC (**paragraph 3.2.5 to 3.2.7**) or the limited number of residents from Enfield visiting the SAC (**paragraph 3.2.5**). It has engaged a higher-than-average occupancy rate for Enfield when compared to proposed housing types (**paragraph 3.2.10**) and uses the mid-range figure for each SANG project uplift category rather than the upper range (**paragraph 3.7.3**). These factors mean that the total visitor uplift generated by the ELP will mitigate a worst-case recreation impact scenario in order to provide assurance over the delivery of effective SANG mitigation in Enfield.

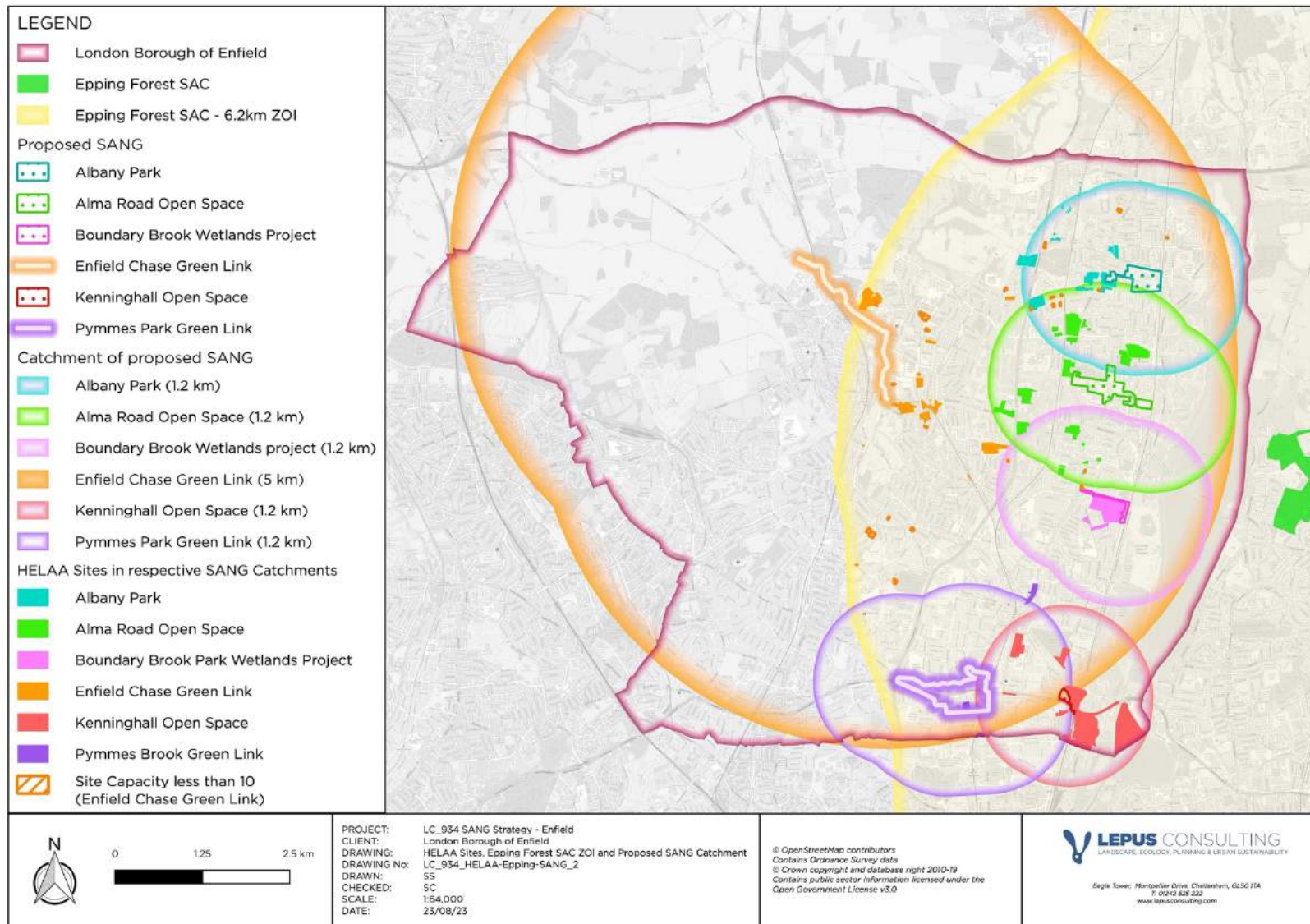


Figure 6.1: Residential sites within Epping Forest SAC ZOI and corresponding SANG catchments

SANG Costs and Breakdown

Enfield Chase, Enfield (Credit: Lepus Consulting)



7 SANG Costs Breakdown

7.1 Costs breakdown

7.1.1 **Table 7.1** provides a summary of costs for each project. All costs are calculated on the basis of delivering, managing and maintaining each SANG project in perpetuity (which is defined as 80 years). These costs do not include SANGs payments already secured through planning permissions referred to in **Section 4** 'Consented SANGs'. Costs include money for advertisement of each SANG and the monitoring and review of the success of enhancements.

Table 7.1: Summary of SANG project costs

Proposed SANG Project	Gross Cost ⁵⁴
Kenninghall Open Space	£1,618,620.00
Albany Park	£294,940.00
Alma Open Space	£467,425.00
Boundary Brook Wetlands Project	£172,360.00
Pymmes Park Green Link	£103,020.00
Enfield Chase Green Link	£637,120.00
Management and monitoring costs (including educational / promotion events)	£272,000.00
Contingency costs (10%)	£329,348.50
Total⁵⁵	£3,894,834

⁵⁴ * Gross Costs include implementation and delivery costs, an allowance for maintenance in perpetuity (80-year period).

⁵⁵ Tariff costs will be updated each year in line with BCIS Cost inflation indices for Construction works so inflation is not accounted for in these figures. Tariff will be paid for through S106 contributions however London Borough of Enfield reserves the right to contribute CIL funding to SANGs fund on a proportionate basis where appropriate.

7.2 Advertisement and promotion of SANG

7.2.1 As noted in **Section 7.1**, a component of SANG costs will be the advertisement of the SANGs to new residents. This will be achieved through promotion of SANG projects on Enfield's website as an alternative destination to the SAC to relieve recreational pressures. Details on the SAC's sensitives will be provided in non-technical and easily accessible language.

7.2.2 In addition, new residents within the Epping Forest Zol will be provided with a leaflet detailing the location of their nearest SANG project and other accessible recreational space. A budget has also been included within each SANG project to provide for regular events promoting SANG and the borough's wider green infrastructure network.

7.2.3 Opportunities for outdoor learning and engagement with local spaces has been incorporated into SANG costs. For instance, QR codes on waymarking and site interpretation boards will provide users with further information on the green and blue infrastructure network in Enfield and the Enfield Chase Landscape Recovery Project. Outdoor education areas will also be provided in Albany Park.

7.3 Council Training

7.3.1 Staff within the Council's parks team will be trained to ensure the upkeep and ongoing maintenance of each SANG project is achieved in perpetuity in line with a management plan. In addition, a council officer within the Development Management Team will be trained on the use of a SANG capacity monitoring spreadsheet (as detailed in **Section 9**). This officer will also be responsible for ensuring that relevant monitoring surveys are undertaken, and comparison made against expected visitor uplift for each SANG. These costs have been included in the detailed SANG project cost breakdowns.

Funding and Delivery

Albany Park, Enfield (Credit: Lepus Consulting)



8 Funding and Delivery

8.1 Developer contributions

8.1.1 Any development within the Epping Forest SAC ZoI (**Figure 2.2**) with a net increase of 1 dwelling or more will need to provide mitigation to ensure no adverse impacts on the site integrity of the SAC from recreational impacts. Where impacts are identified, they can be mitigated through a financial contribution to SANG and SAMM. SAMM contributions are set out in the SAMM Strategy. Epping Forest SAC SAMM Strategy Partnership Agreement will be secured through S106 or unilateral undertaking⁵⁶.

8.1.2 Each SANG project has been allocated a forecast 'visitor uplift' that the proposed enhancements will accommodate. The Council will allocate development on a case-by-case basis incrementally until there is no more visitor uplift capacity available. Capacity will be assigned to relevant allocated sites, pre-applications, applications and planning permissions. In instances where applications are refused or dismissed on appeal or where planning permission lapses, then the relevant allocated SANG capacity is returned for another development to utilise. SANG will need to be in place prior to occupation of development and funded in perpetuity (to cover ongoing management and maintenance). Final, detailed costings and management and maintenance plans will be required to secure funding through the authority's S106 governance process.

8.2 Tariff Collection

8.2.1 The current estimate of SANG charge per net additional unit is £353 per dwelling in 2022/23 and is to be paid upon commencement via S106 or unilateral undertaking. This will be updated in line with the (Community Infrastructure Levy) CIL charging schedule on an annual basis and will be subject to review as part of future reviews of the ELP. In exceptional circumstances the authority will determine where this payment can be covered through CIL Payments.

⁵⁶<https://governance.enfield.gov.uk/documents/s99969/Appendix%201.%20EFSAC%20governance%20agreement%20FINAL%20ONE%20v.%2013.0.pdf>

Monitoring and Review

Albany Park, Enfield (Credit: Lepus Consulting)



EUROPEAN BEAVER

HAS BEEN EXTINCT IN
THE UK FOR 400 YEARS
BUT IS NOW MAKING A
COMEBACK

KEystone
SPECIES

9 Monitoring and Review

9.1 Monitoring

- 9.1.1 Regular monitoring of each SANG project is essential to ensure that it is effective in achieving its aim to provide a realistic alternative recreational space to Epping Forest SAC for new residents delivered through the ELP. This will also provide transparency to the process and help inform future SANG Strategy reviews.
- 9.1.2 Through an existing standardised system (Exacom), the Council will monitor the implementation of planning obligations. This will demonstrate how the spending of contributions on SANG mitigation enhancements have been made and will be linked to proposed SANG catchment areas for individual applications.
- 9.1.3 Of particular importance is the ability of each SANG project to achieve its forecast visitor uplift capacity and therefore effectively attract new visitors from the SAC. Baseline quantitative visitor surveys will be undertaken with optical monitors prior to the commencement of enhancement works and three months following completion of works. Detailed surveys will be completed every 5 years thereafter. Visitor surveys should follow a clear methodology prepared in consultation with Natural England.
- 9.1.4 A programme of SANG monitoring will be linked to monitoring of the ELP. All monitoring information will be shared with Natural England and published in statutory Annual Monitoring Reports. A range of monitoring proposals are set in in **Table 9.1**.
- 9.1.5 In addition, Enfield Council will prepare an Enfield Epping Forest SAC Recreation Mitigation Implementation Strategy within three years of the adoption of the Local Plan. This will set out at a strategic level the progress made in delivering SANG projects, the visitor uplifts achieved, and any revisions required to projects to achieve further uplifts in the context of wider visitor monitoring at the SAC and changes in the trajectory of development in Enfield.

Table 9.1: Proposals for SANG monitoring

Theme	Indicator	Scale and frequency	Target
Visitor Uplift	Visits per day	Prior to works. 3 months following completion. Every 5 years. Reporting after each stage.	Visitor uplift secured as expected
Funding	Incoming financial contributions for SANG (£). Total expenditure on SANG (breakdowns to be provided)	Ongoing with annual reporting	Income matches SANG expenditure set out within Enfield Epping Forest Recreation Mitigation Strategy
SANG Capacity	SANG capacity (homes delivered in SANG catchment)	Ongoing with annual reporting	Ensure sufficient SANG capacity for housing supply

9.2 Review

9.2.1 The Council will regularly monitor the availability of SANG within the borough to ensure there is sufficient capacity within the correct catchment areas to provide effective mitigation for new residential dwellings. The Enfield Epping Forest SAC Recreation Mitigation Strategy will be reviewed and updated at regular intervals to reflect monitoring outputs.

Appendix A: Proposed SANG Site Photos



Kenninghall Open Space (Credit: Lepus Consulting)



Durants Park and Alma Road Open Space (Credit:



Albany Park (Credit: Lepus Consulting)



Boundary Brook (Credit: Lepus Consulting)



Boundary Brook (Credit: Lepus Consulting)



Pymmes Park (Credit: Lepus Consulting)



Pymmes Park (Credit: Lepus Consulting)



Enfield Chase Link (Credit: Lepus Consulting)



Enfield Chase Link (Credit: Lepus Consulting)



Habitats Regulations Assessments

Sustainability Appraisals

Strategic Environmental Assessments

Landscape Character Assessments

Landscape and Visual Impact Assessments

Green Belt Reviews

Expert Witness

Ecological Impact Assessments

Habitat and Ecology Surveys



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