

MAYOR OF LONDON

Ilford Opportunity Area
Planning Framework (OAPF)
Habitats Regulations
Assessment (HRA)
Screening Report

September 2026

Introduction

- 1.1 This report responds to requirements of the Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations) which implements the requirements of the European Commission's Habitats Directive 92/43/EEC. Consideration is given as to whether or not the OAPF is likely to have significant effects on the integrity of sites designated of European level biodiversity interest, either alone, or in combination with other plans or projects.
- 1.2 The London Plan was published in 2021. An HRA was undertaken for the Draft London Plan, and an updated report was published in July 2018 (AECOM 2018). This assessment considered the implications for European sites of proposed policies and proposals at London-level, including Policy SD1 on Opportunity Areas. This assessment stated that: For the most part the opportunity areas are relatively remote from European sites and the overall focus on the role of the London Plan (and Mayor's agencies) in these opportunity areas is on improvement/delivery of sustainable public transport, which will be positive for air quality.
- 1.3 The draft London Plan was published in the summer of 2026, and it is be accompanied by a [Habitats Regulations Assessment](#), the contents of which have informed the HRA for Ilford OAPF. It did not specifically identify any issues with the Ilford Opportunity Area.
- 1.4 The focus of this screening report is to specifically consider the implications of the draft Ilford OAPF on European sites.

Need for plan assessment

- 1.5 The UK left the European Union (EU) on 31 January 2020 under the terms set out in the European Union (Withdrawal Agreement) Act 2020 ("the Withdrawal Act"). While the UK is no longer a member of the EU, a requirement for Habitats Regulations Assessment will continue as set out in the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019¹.
- 1.6 Article 6 of the European Habitats Directive (92/43/EEC) provides the means by which the European Union meets its obligations in relation to natural habitats, flora and fauna under the Bern Convention. The main provision of the Directive relevant to this report is concerned with the assessment and review of plans and projects which have the potential to affect Natura 2000 sites. Natura 2000 sites include: Special Protection Areas established in accordance with the requirements of the Birds Directive (2009/147/EC as amended) and Special Areas of Conservation established in accordance with the requirements of the Habitats Directive.
- 1.7 Articles 6(3) and 6(4) of the Habitats Directive state:

6 (3) Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public.

¹ These don't replace the 2017 Regulations but are just another set of amendment.

6 (4) If, in spite of a negative assessment of the implications for the site and in the absence of alternative solutions, a plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of a social or economic nature, the Member State shall take all compensatory measures necessary to ensure that the overall coherence of Natura 2000 is protected. It shall inform the Commission of the compensatory measures adopted. 3 Where the site concerned hosts a priority natural habitat type and/or a priority species, the only considerations which may be raised are those relating to human health or public safety, to beneficial consequences of primary importance for the environment or, further to an opinion from the Commission, to other imperative reasons of overriding public interest.

The Conservation of Habitats and Species Regulations 2017 (as amended) (Habitats Regulations) transpose into domestic legislation obligations associated with both the European Birds Directive and the Habitats Directive. Regulation 102 of the Habitats Regulations is the most pertinent in relation to this report. Regulation 102(1) states: Where a land use plan— is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and is not directly connected with or necessary to the management of the site, the plan-making authority for that plan must, before the plan is given effect, make an appropriate assessment of the implications for the site in view of that site's conservation objectives. The term 'Habitats Regulations Assessment' is used to cover the whole process of assessing the effects of a land use plan on European sites and Ramsar sites. An Appropriate Assessment is only one stage within the whole process of HRA (see methodology section for further details).

The European site network comprises sites of nature conservation value that benefit from statutory protection at the European level. These sites include: Special Areas of Conservation (SACs) and candidate Special Areas of Conservation (cSACs) [designated under the EC Habitats Directive]; Special Protection Areas (SPAs) and potential Special Protection Areas (pSPAs) [classified under the EC Birds Directive 1979, 79/409/EEC]. The Government also expects candidate SACs (cSACs), potential SPAs (pSPAs), and Ramsar sites [designated under the Ramsar Convention 1976] to be included within the HRA process. For the purposes of this report European sites are considered to include SACs, cSACs, SPAs, pSPAs and Ramsar sites.

Purpose of this report

- 1.8 This report presents the HRA screening for the emerging Ilford OAPF. It sets out the methodology for the HRA, determines the European sites that require consideration with regards to potential effects arising from the OAPF, and then goes through the assessment process, assessing likely significant effects on relevant European sites and presents its conclusions.

Consultation

- 1.9 Consultation on this HRA screening report is taking place alongside consultation on the draft OAPF. In their role as SEA Consultation Body, Natural England were consulted on the IIA Scoping Report and submitted a response.
- 1.10 There is no pre-defined guidance that dictates the physical scope of an HRA of a Plan document. Current guidance suggests that the following Habitats Sites should be included in the scope of an HRA assessment:
 - All Habitats Sites within the boundary of the Plan area; and,

- Habitats Sites located outside of the Plan area shown to be linked to development in the Plan through an 'impact pathway' (discussed below).

1.11 Generally, it is uncommon for development plans to be deemed to have significant impacts on Habitats Sites situated more than 10km from areas of growth. For example, most core recreational catchments (except for some coastal sites) are under 10km in size, the majority (nearly 70%) of people in employment in the UK travel less than 10 km to work⁶ and the remainder will generally have dispersed across the network by that distance. It should be noted that the presence of a conceivable impact pathway linking a Plan to a Habitats Site does not mean that Likely Significant Effects necessarily exist.

Methodology

1.12 The HRA will be carried out with reference to the general EC guidance on HRA² and that of the UK government³. Figure 1 below outlines the stages of HRA. The stages are essentially iterative, being revisited as necessary in response to more detailed information, recommendations and any relevant changes to the Plan until no significant adverse effects remain.

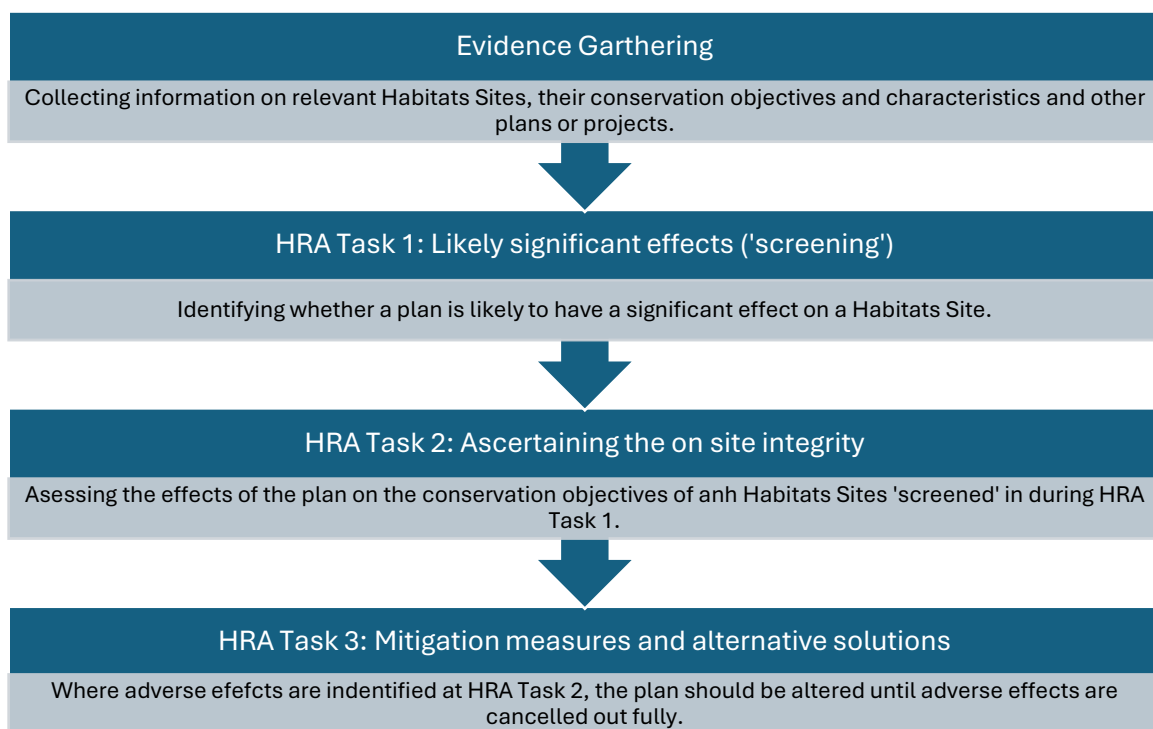


Figure 1: Four Stage Approach to Habitats Regulations Assessment. Source

² European Commission (2021): Assessment of plans and projects significantly affecting Natura 2000 Sites: Methodological Guidance on the Provisions of Article 6(3) and 6(4) of the Habitats Directive.

³ [Habitats regulations assessments: protecting a European site - GOV.UK](#). Note that there is at time of writing (April 2026) a consultation underway on updates to this guidance, but this is regards providing additional detail o improve the guidance rather than changing the HRA process.

- 1.13 The first task, screening for HRA, will determine if planning policy and guidance documents are likely to have a significant effect on the conservation objectives of the European sites. This will determine whether stages 2 and 3 of the HRA are required.

OAPFs

- 1.14 Opportunity Area Planning Frameworks (OAPF) are strategic planning frameworks that set out planning, regeneration and design guidance for Opportunity Areas (OAs). OAPFs are informed by policy and guidance from national to local level.
- 1.15 Through the Opportunity Area Planning Framework (OAPF) process, the Greater London Authority (GLA) and Transport for London (TfL) offer strategic planning and design expertise to London boroughs to define, support and deliver Good Growth in London's Opportunity Areas. Working in partnership with strategic stakeholders and local communities, OAPFs complement local and strategic planning policies in addressing the challenges and opportunities in OAs and identify the necessary physical and social infrastructure to support growth.
- 1.16 The OAPF is a London Plan Guidance and is adopted by the Mayor of London as such. While the OAPF does not establish new policies, the framework does provide a direction of travel for forthcoming Local Plan and policy reviews at both regional and local level. It will be a material consideration in planning decisions, the plan making process and Section 201 negotiations. An OAPF can also be adopted by a local planning authority as a Supplementary Plan.
- 1.17 The OAPF sits alongside the London Plan's strategic policies and the more detailed policies of Redbridge's Local Plan. It must be read in the context of the relevant statutory planning policy which apply to development proposals in the OAPF area.

Outline of the draft Ilford OAPF

Purpose and process

- 1.18 Ilford was designated as an Opportunity Area (OA) in 2004, with the potential of delivering 6,000 homes and 700 jobs by 2041. Unlike many other OAs awaiting major infrastructure investment, Ilford already has strong transport links (Elizabeth Line) and contains several stalled or shovel-ready sites.
- 1.19 The Ilford Opportunity Area Planning Framework (OAPF) is being prepared as a long-term planning framework to support and guide emerging development in the Ilford Riverside Opportunity Area up until 2051.
- 1.20 The OAPF is being prepared by the Mayor of London (the GLA), Transport for London, the London Borough of Redbridge (LBR). Early engagement took place from December to March 2025, focusing on specific groups (young people, young women, older and disabled residents, and businesses). As a listening exercise, it enabled open, in-depth participation and was seen by participants as the start of an ongoing relationship. Concerns and ideas raised in the early engagement report provide a basis for the OAPF material.
- 1.21 This framework has been prepared to ensure that future investment and growth in the OA is planned for on the basis of its potential to improve the health and quality of life for both existing and new residents in the area.

Emerging OAPF principles

- 1.22 An extensive review of existing documents, policies, and guidance was undertaken to capture the breadth of previous thinking in this area. Analysis and mapping of the evidence base, combined with insights gathered through engagement, have deepened our understanding of what is working well and where there are gaps within Ilford OA.
- 1.23 This process informed the development of six principles to guide good growth and development in Ilford (See Figure 1). The principles build on LBR's existing priorities and align with the ambitions set out in the Corporate Plan.

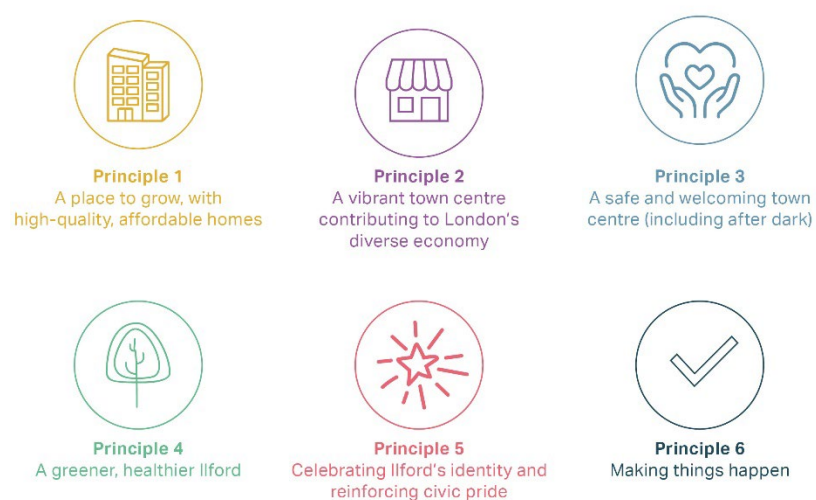


Figure 2: Emerging OAPF principles

Form and content of the OAPF

- 1.24 The OAPF comprises the following linked sections:

Part 1: Setting the scene This section sets out what the strategic context, the case for change and what we are doing, and why. It provides an overview of the policy framework, how we have engaged and all the studies that have led us here.

Part 2: Vision and Principles: This section sets out an overall vision for Ilford and thematic principles which outline the key aspirations for the area over the next 20 years.

Part 3: Supporting Good Growth: This section sets out the strategy and recommendations/actions for how to deliver on the OAPF principles.

Part 4: Ilford's Places: This section outlines development principles and identifies public realm improvements for seven areas across the OA.

Part 5: Unlocking Good Growth with infrastructure: This section outlines how stronger infrastructure - across transport, energy, water, digital and waste - underpins and unlocks good growth in Ilford.

Part 6: Making things happen: This section focuses on implementation, infrastructure delivery, an indicative delivery roadmap and outlines potential delivery vehicles.

Identification of relevant sites

1.25 There are three Special Areas of Conservation (SACs), two Special Protection Areas (SPAs), and two Ramsar sites (wetlands of international importance) in London:

- **Richmond Park SAC** located within the London Borough of Richmond upon Thames and immediately adjacent to the London Borough of Wandsworth and the Royal Borough of Kingston upon Thames.
- **Wimbledon Common SAC** located in the London Borough of Wandsworth and the London Borough of Merton and immediately adjacent to the Royal Borough of Kingston upon Thames.
- **Epping Forest SAC** located in the London Borough of Waltham Forest, the London Borough of Redbridge and Epping Forest District; hence partially inside and outside the GLA boundary.
- **Lee Valley SPA and Ramsar site** located in the London Borough of Waltham Forest, Epping Forest District and the Borough of Broxbourne; hence partially inside and outside the GLA boundary.
- **South West London Waterbodies SPA and Ramsar site** located in the London Borough of Hounslow, the Borough of Elmbridge, the Borough of Runnymede, the Borough of Spelthorne and the Royal Borough of Windsor and Maidenhead; hence partially inside and outside the GLA boundary.

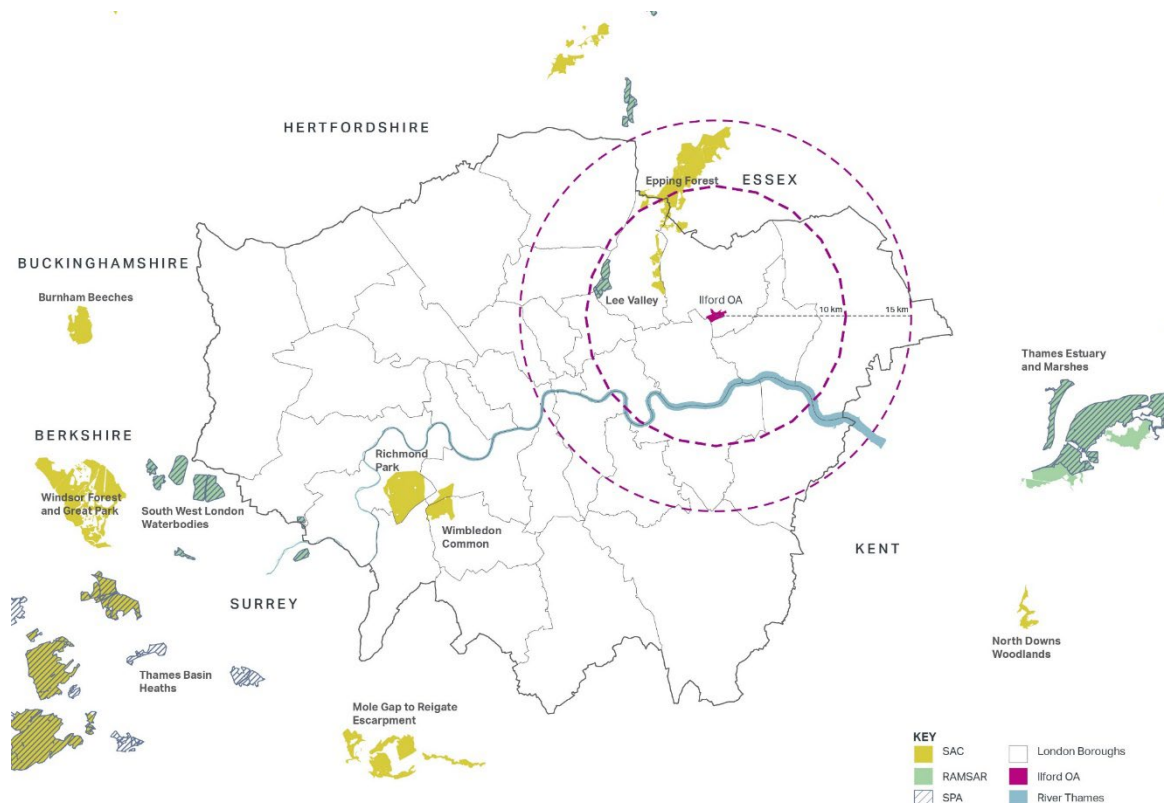
1.26 Outside London, the following habitats sites are also considered because there is potential for impacts stemming from the London Plan to create significant effects:

- **Thames Estuary and Marshes SPA and Ramsar site**, located 8.3 km from GLA boundary. Within Medway District Council, Gravesham Borough Council, and Thurrock Borough Council areas.
- **Burnham Beeches SAC** located 8.7 km from GLA boundary. Within South Buckinghamshire District Council area.
- **Mole Gap to Reigate Escarpment SAC** located 5.3 km from GLA boundary. Within Mole Valley District Council and Reigate and Banstead Borough Council areas.
- **Wormley- Hoddesdonpark Woods SAC** located 3.7 km from GLA boundary. Within Broxbourne Borough Council, Welwyn Hatfield Borough Council, and East Hertfordshire District Council areas.
- **Windsor Forest and Great Park SA** located 5.7 km from GLA boundary. Within Royal Borough of Windsor and Maidenhead, Bracknell Forest Borough Council and Runnymede Borough Council areas.
- **Thames Basin Heaths SPA** located 7.5 km from GLA boundary. Within Bracknell Forest Council, Surrey Heath Borough Council, Woking Borough Council, Guildford Borough Council, Rushmoor Borough Council, Waverley Borough Council, and Hart District Council areas.

- **Thursley, Ash, Pirbright & Chobham SAC** located 11.0 km from GLA boundary. Within Surrey Heath Borough Council, Guildford Borough Council, Woking Borough Council, and Waverley Borough Council areas.

1.27 Using the emerging HRA of the London Plan and the [MAGIC website](#) the GLA identified those European sites within a 15km zone extending from the boundary of the Opportunity Area. European sites were scoped into the study if they were either wholly or partially within this geographical area. The table below summarises the sites that are relevant to the Ilford OA:

European site	Qualifying Features
Epping Forest SAC	Atlantic acidophilus beech forests, Northern Atlantic wet heaths with <i>Erica tetralix</i> , and European dry heaths. Stag beetle (<i>Lucanus cervus</i>)
Lee Valley SPA	Internationally important populations of northern shoveler (<i>Anas clypeata</i>), gadwall (<i>Anas strepera</i>), and bittern (<i>Botaurus stellaris</i>)
Lee Valley Ramsar	Nationally scarce plant species (whorled watermilfoil) <i>Myriophyllum verticillatum</i> and the rare or vulnerable invertebrate (<i>Micronecta minutissima</i>). Species/populations occurring at levels of international importance: Northern Shoveler, and Gadwell.



1.28 In order to assess whether the Ilford OAPF will have a significant effect on European Sites, the HRA of the draft London Plan was reviewed for the three particular sites identified. The London Plan HRA identified the various ways in which land use plans can impact on internationally designated sites by following the pathways along which development can be connected with those sites. Pathways are routes by which a change in activity associated with a development can lead to an effect upon an internationally designated site. Four impact pathways were identified, and were discussed in relation to each European site:

- Recreational activities and urbanisation
- Atmospheric pollution
- Water Abstraction
- Water Quality

Assessment

Epping Forest SAC

Introduction

1.29 Epping Forest is a large ancient wood-pasture with habitats of high nature conservation value including ancient semi-natural woodland, old grassland plains, wet and dry heathland and scattered wetland. The semi-natural woodland is particularly extensive, but the forest plains are also a major feature and contain a variety of unimproved acid grasslands.

1.30 The site lies partly within the London Boroughs of Redbridge and Waltham Forest and is therefore closely connected to growth pressures arising from North East London.

Current pressures

1.31 The principal vulnerabilities identified for the SAC are:

- Air pollution and atmospheric nitrogen deposition
- Recreational pressure and public disturbance
- Water pollution and hydrological change
- Invasive species and disease

Assessment

Recreational pressure and urbanisation

1.32 Ilford Opportunity Area lies within the borough identified by the London Plan HRA as one of the principal sources of visitors to Epping Forest SAC. Visitor survey evidence identifies a core recreational catchment of approximately 6.2-6.7km around the SAC, with Redbridge contributing approximately 12.5% of development-related recreational pressure.

1.33 The OAPF supports significant housing and employment growth which could increase recreational visits to the SAC. However, the London Plan HRA concludes that adverse effects can be avoided through the implementation of mitigation measures including:

- The Redbridge Natural Greenspace Improvement Strategy
- Suitable Alternative Natural Greenspaces (SANGs)
- Green infrastructure enhancements
- Improvements to recreational opportunities along the River Roding corridor and other local open spaces

1.34 The OAPF includes proposals for enhanced green infrastructure, public realm improvements, better access to open space, and ecological enhancements to the River Roding corridor, which are likely to provide alternative local recreational opportunities. Overall, the OAPF sets out proposals to retain, enhance, and increase the quantum of local open space, encouraging greater public access. It is considered that the OAPF will not have any likely significant effects on the Epping Forest SAC.

Air quality

1.35 The draft London Plan HRA identifies air pollution as the key remaining uncertainty for Epping Forest SAC. The SAC is already affected by elevated nitrogen deposition associated with road traffic and is sensitive to additional emissions. Growth promoted under Policy PV1 Brownfield First Opportunity Areas was specifically assessed as capable of contributing to this pathway.

1.36 The Ilford OAPF does not propose additional development beyond that already anticipated through the Draft London Plan and relevant development plan documents. While Epping Forest SAC is sensitive to atmospheric pollution, the OAPF primarily supports growth in a highly accessible urban location with excellent public transport connectivity and promotes a significant shift towards sustainable travel. Furthermore, the OAPF contains measures to enhance active travel, improve public transport accessibility and reduce reliance on private vehicles. Given the strategic nature of the document, the absence of additional growth beyond that already assessed through the Draft London Plan, and the distance between the Opportunity Area and Epping Forest SAC, no likely significant effects are expected on the SAC through air quality pathways, either alone or in combination with other plans and projects.

Lee Valley SPA and RAMSAR

Introduction

1.37 Lee Valley SPA and Ramsar Site comprises reservoirs, wetlands, former gravel pits and associated habitats supporting internationally important wintering populations of gadwall, shoveler and bittern. The closest internationally designated components relevant to London are the Walthamstow Reservoirs and associated wetlands.

Current pressures

1.38 Key vulnerabilities include:

- Public access and disturbance

- Water pollution
- Hydrological change
- Air pollution
- Invasive species

Assessment

Recreational pressure and urbanisation

- 1.39 The draft London Plan HRA identifies no significant pathway whereby growth associated with Brownfield First Opportunity Areas would adversely affect the SPA or Ramsar site. Monitoring data indicates no significant decline in qualifying bird populations despite increased public access at Walthamstow Wetlands. Existing access controls, visitor management measures and long-term ecological monitoring provide an effective mitigation framework.
- 1.40 The Ilford Opportunity Area is located approximately 5-8km from the nearest components of the designated site and is physically separated from the SPA/Ramsar by extensive areas of existing urban development. The OAPF places particular emphasis on improving access to the River Roding, enhancing public realm, increasing urban greening and improving connections to local open spaces. These interventions are likely to encourage greater use of local recreational assets rather than increasing reliance on more distant recreational destinations such as the Lee Valley.

Air quality

- 1.41 The draft London Plan HRA concluded that air quality impacts are unlikely to adversely affect the integrity of the Lee Valley SPA and Ramsar Site. The qualifying interests relate primarily to wintering waterfowl associated with open water habitats rather than nitrogen-sensitive terrestrial habitats. The HRA found no evidence that growth associated with housing, employment development or Brownfield First Opportunity Areas would adversely affect the site through atmospheric pollution pathways.
- 1.42 The Ilford OAPF supports development in a location with excellent public transport accessibility, centred on the Elizabeth Line, extensive bus services and opportunities for active travel. The framework promotes mode shift away from private car use through investment in walking, cycling and public transport connections. Consequently, the OAPF is not expected to generate significant increases in vehicle movements that could materially affect air quality at the SPA.

Water Resources and Water Quality

- 1.43 The draft London Plan HRA also assessed potential effects on water resources and concluded that no adverse effects on the integrity of the Lee Valley SPA and Ramsar Site would arise. The reservoirs that support the qualifying bird populations are actively managed by Thames Water and form part of London's strategic water supply infrastructure. Existing and planned water resource management measures already account for forecast population growth across London.
- 1.44 The Ilford OAPF does not propose any development that would directly alter hydrological conditions within the SPA or Ramsar Site. In addition, development coming forward through the OAPF would be subject to London Plan policies concerning sustainable drainage, water efficiency and water quality protection. The OAPF also supports enhancement of the River Roding corridor

and improvements to blue-green infrastructure which are likely to contribute positively to wider water management objectives.

Conclusions

- 1.45 This report has identified two European sites within 15km of the Ilford Opportunity Area: Epping Forest SAC and the Lee Valley SPA/Ramsar Site. The assessment considered their qualifying features, conservation objectives and vulnerabilities, together with the findings of the draft London Plan Habitats Regulations Assessment.
- 1.46 The OAPF does not allocate land within or adjacent to either site and primarily supports growth already anticipated through the London Plan. The Opportunity Area is a highly accessible urban location with substantial proposed open space, green infrastructure and sustainable transport improvements, including enhancements to the River Roding corridor.
- 1.47 Taking account of the distance from the designated sites, the absence of direct impact pathways, and the mitigation provided through London Plan and local planning policies, it is concluded that the Ilford Opportunity Area Planning Framework is not likely to have a significant effect, either alone or in combination with other plans or projects, on the integrity of Epping Forest SAC or the Lee Valley SPA/Ramsar Site. Therefore, Appropriate Assessment is not required.