Organisation	Page Number	Section Title	Current text	Comments	Response	Action
Individual		General comments		I note in page one there is a reference to slowing down the rate at which rainwater passes into the river channel. This is a highly desirable aim as throughout the entire catchment area the aquifers are drained of their water by the Water Utility Companies but not allowed to fully replenish properly during times of plenty (like now) . The problems with fast run off begin way outside the area of the LVRPA . For instance the Rib which mostly flows through quite steeply rolling farm land is no longer recognisable as a chalk stream due to abstraction. Compounding this are the problems of nitrate/phosphate pollution from farmland plus siltation caused by run off (a good example of this is the ford on the Youngsbury Estate where currently following recent heavy rain the bridle path leading down to the ford is heavily eroded back to its base gravel /rock the topsoil heavily laced with leaf mould and horse manure is now in the river. All of the ditches nearby are at full flow with thick muddy water much of which comes from a few feet under the farmland through mole drains designed to dry the land out as soon as possible. On the roads the long slope from High Cross to wadesmill and the opposite slope from Hanbury Manor to Wadesmill is like a fast running stream in times of rain the surface drains are poorly maintained and most of the surface water with its associated pollutants (oil, rubber etc) goes straight into the river. This picture can be repeated right across the head waters of the valley on the Stort, Ash, Rib, Beane, Mimram and the Lea itself. Anything we do downstream in the Park can't be helped by the events upstream.	Noted. The areas identified fall outside the scope of this document. We can look to raise this with the relevant River Catchment Partnerships to see if they can look into and address some of these issues.	Pass comments on to the River Catchment Partnership
Borough of Broxbourne		General comments		I am sure that Broxbourne will be supportive. It would be really helpful if you had maps of the habitats and actions that we can pin down to this Borough. We would like to support your projects through section 106 agreements that are currently being negotiated.	Noted	Include maps of the habitats and actions in the detailed Habitat Action Plans.
Essex Wildlife Trust				Just wanted to confirm Essex Wildlife Trusts support for the LVRP Biodiversity Action Plan. Although I haven't been through the plan in detail your main objectives align very much with EWTs and I'm sure we would be in close agreement on the detail of the plans. Please use this email as confirmation of EWTs support for the plan. As you know we are always keen to deliver partnership projects building on the success of previous initiatives and ongoing agreements. If there is anything we can assist with or develop together please don't hesitate to contact me.	Support noted and welcomed	No Change
				The poor management and maintenance of grass cutting with the distinct lack of any consideration for wildlife, plants etc. There seems no plan/management of the grass cutting and related activities, i.e bee orchid areas cut, lack of wild flower areas due to grass cutting, cutting when not necessary, generally poorly managed and always for the supposed benefit of humans and not the wildlife/plants which are more important.	Areas of grassland are managed differently dependant on the areas focus. This is reviewed regularly and management regimes altered. It is anticipated that grassland management will be reviewed when the SMART targets are set in the Grassland and Fen Habitat Action Plan	No Change
						Review grassland management priorities through the Grassland and Fen Habitat Action Plan
				The worrying decline of Birds, mammals and wildlife. Winter used to be a magical time over Fishers Green but all wintering ducks are on the decline, poor management of reed beds means less Bitterns, summer used to bring large number of hobbies but less dragonflies, house/sand martins and Swallows.	There can be yearly variations in bird numbers and trends in the valley do seem to reflect national trends. It is anticipated that the Standing Open Water SAP will continue to monitor and address if needed any identified issues.	No Change
				Less invertebrates also means less birds and mammals.	There is no evidence to prove that there are fewer invertebrates found on sites in the Lee Valley however we have had a number of surveys conducted that will provide a baseline for future comparison. These sites have highlighted a number of nationally and regionally important invertebrate species found within the Regional Park and targeted management is taking place to enhance habitats for them. These actions will be picked up through the various HAP's.	Identify specific actions for invertebrates through the Habitat Action Plans

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Individual				I can't remember the last time I saw a new nest box being put up for birds/ bats etc.	There are over 180 nestboxes targeting bat and bird species on LVRPA land within the Regional Park.	No Change
				More planting like the wild field near the Turnford end this year is urgently need around the whole park. All in All the Lee valley park have let the ball slip badly over the last 10 years. The wildlife used to be you priority now they seem like an inconvenience, I am sad to say.	The on-going management of habitats across the Park is seeking to improve the diversity and quality of the species present. Whilst the planting of nectar and seed-rich mixes provides an excellent resource it is not suitable for all locations and may be of detriment to other species present in some locations.	No Change
				General lack of interest from the Lee Valley Park. Same theme I'm afraid, You seem to have less staff/experts these days making a positive difference to the Park and I am not sure what an amazing place this used to be. I have no idea when I last saw a water vole, I used to seem them weekly and I know Mink are a huge problem but with all the stuff above I have mentioned it can't be the only excuse. The lack of maintenance/ on the hides is just indicative of the Lee Valley Parks attitude. Miss management in my opinion of many areas, the scrape, cornmill meadows, goose field, seventy acres, priority for fisherman who leave lines and hooks for birds to die from, the list is endless.	Mink population is actively managed through trapping programme. Whilst relatively high numbers are caught in the park, it is likely that new animals move in from higher up the river catchment. Regarding management, the park itself has aged considerably since it was first established. Much of the infrastructure, bridges, benches, bird hides have required replacement, often around the same time with a limited budget so at times there are delays in getting repairs done on less essential items. Similarly the vegetation has matured staff and resources, including volunteers, are more thinly stretched in dealing with tree safety issues and problematic invasive species, eg *Crassula helmsii* at the Goosefield and Hall Marsh Scrape. Resources are therefore targeted towards key areas and projects and whilst more can be done to manage the site for optimum nature conservation, additional resources would be required to do so. Where possible agri-environment schemes are entered into to secure such additional resources.	No Change
Individual				Thankyou for sending the revised BAP with the Creeping marshwort plan. It looks OK though I don't think soil compaction due to overgrazing is likely to become a problem for Creeping marshwort as it seems to prefer overgrazed areas on Port Meadow and North Hinksey.	Noted	Amend text under section Creeping Marshwort Species Action Plan Introduction as follows: The plant relies on an open sward habitat to thrive and enlarge its territory. The use of Cattle grazing will help to provide this structure. ~~although this needs to be managed carefully to avoid compaction of the soil.~~
				It is disappointing that the plant has not responded to the re-excavations of the scrape areas.	Agreed	No Change
				I hope Brian still has material in cultivation, perhaps some should be sent to the Millennium Seed Bank for them to bulk up as seed?	Noted	Contact Brian Wurzell and the Millennium Seed Bank
				I think the plan needs to have rather more about what you plan to do next.	This detail will be developed in co-ordination with the Species Action Plan group	Invite to respondent to become member of the Creeping Marshwort Species Action Group
				The impact on biodiversity should be considered with regards to events held across the Park, planning and mitigating impacts on the Environment where and when the events are held.	This will be addressed by a couple of mechanisms: • Cross-cutting Themes - Ensure that the protection and enhancement of biodiversity is integrated across the work of Lee Valley Regional Park • The Park Development Framework's draft Strategic Policies do mention this issue but currently their scope may need to be widened to ensure all impacts are fully assessed.	No Change
				Planning - The Strategic Polices for the Natural Environment and Natural England's (NE) Comments should be considered alongside the BAP (Attached)	These comments will be looked at as a part of the Park Development Framework.	No Change

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Natural England				Consideration around land sales (Outlined in Strategic Polices), making sure ecological value, public access and value etc. are considered when identifying suitable sites for potential sale.	This would be dependant on policies of different landowners within the boundary of the Lee Valley Regional Park. The Authority has an adopted Corporate Land and Property Strategy (2017 - 2027) within which it operates. This strategy will only release land once it has secured the relevant planning permission. Monies from any sale would be reinvested into Lee Valley Park including enhancements which could benefit biodiversity and obtaining new sites.	No Change
				Riverside Development, NE support what is outlined in the BAP plan, considerations should also be made for design elements such as lighting (sensitive, low level) in the Riverside Development areas.	Agreed, consideration to lighting and the impacts on biodiversity should be considered on all planned developments. This will be highlighted in particular through the Bat Species Action Plan and Rivers and Streams Habitat Action Plan.	Consider impacts of lighting through the relevant Habitat and Species Action Plans.
				Agri-Environment – Consideration around expiry dates of current schemes and potential of access to future schemes.	Section on Agri-environment schemes has been inserted. Expiry dates not specifically noted as agreements may be on private land.	Add text under section Landscape Scale Conservation in the Lee Valley as follows: Agri-environment Schemes Agri-environment schemes provide funding to farmers and land managers to farm in a way that supports biodiversity, enhances the landscape, and improves the quality of water, air and soil. The objectives of the current Environmental Stewardship scheme include: • Wildlife conservation (biodiversity) • Maintenance and enhancement of landscape quality and character, by helping to maintain important features, such as traditional field boundaries • Protection of the historic environment, including archaeological features and traditional farm buildings • Promotion of public access and understanding of the countryside • Natural resource protection – if taken up across large areas of the countryside, it will help to improve water quality and to reduce soil erosion and surface run-off. There have been a number of agreements across land-holdings in the valley which can provide targeted enhancements for biodiversity. The availability of funding and range of options available can impact on the effectiveness of these schemes.
				Biodiversity and public volunteering – public access to nature, conducting biodiversity monitoring etc.	This will be addressed through the SMART targets for each HAP and SAP and cross-cutting themes.	Address through the SMART targets
				Trees – consideration for veteran and ancient trees in the Valley and ancient/veterans of the future.	Agreed	Add text under section Woodland, Current Status as follows: Parkland trees form an important part of the historic landscape in areas of the Lower Lea such as Springfield Park and Hackney Marshes. The Countryside Stewardship scheme at Ryegate Farm enabled the recreation of a parkland habitat through planting of trees in the pasture. Belts of mature trees also provide important habitat linking areas together providing commuting habitat for protected species such as bats. Areas of woodland, parkland trees and mature tree belts are often known to include veteran trees or indeed those with the potential to become veteran trees however there is little recorded information on their presence or condition in the Lee Valley.
						Undertake a survey of veteran trees through the Woodland Habitat Action Plan

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				Invasive species and diseases – potential impacts/plan for diseases coming in to London (Chestnut Blight etc.) – Preventing spread of species such as Goats Rue through preventing new developments from planting species etc.	The issue surrounding Goats Rue will be addressed through the INNS Action Plan. The impacts of diseases has been noted in the Woodland HAP.	No Change
				Pest Control – Impacts of controls such as Rodenticide on wider food chains	Noted - this will be addressed through the cross-cutting themes in particular ensuring that the protection and enhancement of biodiversity is integrated across the work of Lee Valley Regional Park	No Change
				Potential consideration of Air Quality and the potential impacts on the environment across the park.	Air Quality is an issue that the Park Development Frameworks Habitats Regulation Assessment has raised in relation to EU sites in and close to the Park. Excess nitrogen deposition is the main highlighted problem due mainly to road transport. The likely significant effect is however in relation to Epping Forest SAC rather than the Park's sites, although the qualifying features are already exposed to excess levels. The Strategic Policies are seeking to set out mechanisms for reducing the potential impacts. The SEA work sees the Park's open spaces and vegetation as a positive - helping to keep the air clean and provide a refuge for wildlife. Unfortunately we don't collect the data for air pollution or have the means to interprate its threat other than where a local authority designates an air quality management zone usually around major roads.	No Change
				Potential Biodiversity benefits of schemes like Natural Flood Management projects	This will be addressed through the cross-cutting themes in best practice management of built environment and open spaces.	No Change
				Future potential biodiversity gain through major infrastructure projects like the West Anglia Mainline	This is covered in the LVRPA's Park Development Framework in draft Strategic Policy B6 where we are seeking to secure compensatory measures for adverse biodiversity impacts via planning obligations.	No Change
				The BAP should reflect the Mayors emerging London Environment Strategy and overarching London Plan.	Agreed - both documents will be referenced in the text, highlighting that the BAP will help achieve their targets.	Amend text under section as follows: Consideration of the BAPs for Hertfordshire, Essex and London and the incorporation of their appropriate targets into the Lee Valley Regional Park BAP will ensure that the partnerships delivering the BAP not only effectively conserve biodiversity within the Park but contribute towards wider initiatives throughout the region. The targets for London set out in the London Plan (2016) have been reviewed and updated for the draft London Environment Strategy. This approach will also help to ensure that action to enhance biodiversity within the Regional Park is relevant and adds value to initiatives surrounding it. This is essential given the Regional Park's strategic position within the Lea Catchment NIA, River Lea Catchment Partnership, Thames Gateway and the Green Arc.
National Grid				This is a very comprehensive plan incorporating the important habitats and species within this area. As you know National Grid have a number of operational substation sites, and overhead line routes within the Lee Valley Regional Park that form a critical part of our energy network.	Noted	No Change
				National Grid are keen to ensure that we maintain the ability to undertake the essential management and upgrade of our network and would be keen to hear of any proposals within the vicinity of our assets to ensure any action plan proposals do not conflict with our ability to undertaken our works. Conversely where we are planning vegetation management work we are keen to work together to identify appropriate opportunities where we can deliver a positive contribution to the wider objectives detailed within the action plan.	Noted	Add National Grid onto list of consultees as SMART targets are being developed
				Within the period covered by the Biodiversity Action Plan, National Grid will be improving the flood resilience of our network at some substations, which will involve some construction activities that will have both temporary and permanent impact on habitats within the Lee Valley. In the development of these construction schemes we will ensure that appropriate mitigation strategies and actions are informed by and agreed with all appropriate parties.	Noted and welcomed	No Change
				You may be aware that a few years ago we received permission for a substantial reinforcement and upgrading of the lines within the park and whilst these works have not yet taken place, there is potential they will come forward in the next few years. Again we would wish to retain the ability to undertake these works but would also look for opportunities to contribute to the Regional Park where possible.	Noted and welcomed	No Change

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Vibrant Partnerships				Vibrant Partnerships welcomes the updated Biodiversity Action Plan and will endeavour to continue to liaise and support LVRPA in developing biodiverse areas of habitats within the curtilage of the leased areas of land that form LVRPA Leisure Services Contract.	Noted and welcomed	No Change
				Vibrant Partnerships will work with LVRPA on specific projects and areas of development as practical to enhance the biodiversity within the curtilage of leased areas taking into account the primary purpose of the venues within the LSC is for recreation (both active and passive) and sporting involvement.	Noted - Sport and Recreation are a key function of the LVRPA alongside that of biodiversity and access to nature.	No Change
				LVRPA should continue to ensure that biodiversity is promoted alongside sport and recreation and where developments or changes are proposed to the Lee Valley Venues that flexible solutions are considered together with suitable mitigation where appropriate.	The draft Strategic Policies which will form part of the Park Development Framework once finalised seek to ensure development within the Park achieves a net gain in natural capital including net gains in biodiversity (B4), Policy V3 states that development which integrates sporting venues with the wider parklands to support a diverse visitor offer will be supported. This will also be supported through the cross-cutting themes under 'Best practice management of built environment and open spaces'. When developments are proposed the NPPF guidelines should be followed and the mitigation hierarchy adhered to.	No Change
				Vibrant Partnerships recommends that LVRPA ensures that a clear understanding of the BAP and requirements is included within the next Leisure Services Contract for management of the venues to ensure that all potential tenderers are aware of restrictions, opportunities and LVRPA targets in relation to biodiversity and the impacts that this may have on the contractor.	Agreed	Ensure that biodiversity and BAP requirements are noted in the Leisure Services Review
Fishers Green Sailing Club				Specifically, you mention that a number of Invasive non-native plant species are present in the Lee Valley and reference New Zealand Pygmyweed, Floating Pennywort, Giant Hogweed and Himalayan Balsam, but I see no mention of Canadian Pondweed (Elodea Canadensis) which is present and often troublesome in Holyfield Lake. As an interested stakeholder, being the Commodore of Fishers Green Sailing Club that uses Holyfield Lake, I think it is important to recognise the presence of Canadian Pondweed in the Valley within the context of your Non-native Species Action Plan. Whilst I acknowledge that there are probably higher priority "invaders" to deal with and I am not expecting any immediate action, I do think that Elodea Canadensis should get a mention in the document.	Agreed	Add text under INNS section as follows: The waterways, waterbodies and riparian habitats are susceptible to colonisation by many invasive non-native species including New Zealand Pygmyweed (Crassula helmsii), Giant Hogweed (Heracleum mantegazzianum), Himalayan Balsam (Impatiens glandulifera), Canadian Waterweed (Elodea Canadensis), Nuttalls's Waterweed (Elodea nuttallii) and Floating Pennywort (Hydrocotyle ranunculoides). Add text under section INNS, Species Action Plan - Current status as follows: Canadian Waterweed (Elodea Canadensis) and Nuttalls's Waterweed (Elodea nuttallii) are both present in the valley in particular in the gravel pit lakes. They can form dense mats impeding flow and creating fluctuations in oxygen levels.
Hertford County Yacht Club				I have reviewed the document and Hertford County YC has no concerns with respect to the current proposals. We currently enjoy harmonious relationships with the anglers and the wildlife which we share the lake and there is nothing in the plan that would change that. We do have two on-going concerns regarding our use of Abbotts Lake for sailing and action to address these could potentially align with the objectives of the Biodiversity Action Plan. Our principal concern is the level of tree cover around Abbots lake which has significantly increased over the 50 or so years that we have occupied the site. It has reached a point where it is now a difficult place to sail in many conditions, particularly in light or strong winds where the wind is shadowed or caused to swirl by the trees. HCYC would therefore support any proposals to increase the amount of open ground around the lake with features such as reed beds water meadows or open fen. Further tree growth will ultimately make the lake nonviable as a sailing venue and some selective tree removal or height reduction adjacent to the lake would make a significant positive difference for us, hopefully without affecting wildlife amenity. At present, we only enjoy clear breeze at Abbotts Lake on the rare days when the wind is in the south east and I am concerned tree growth on the eastern margin of the lake will compromise that unless managed.	Many of the gravel pits have seen the bankside trees increase in number and size as the site matures. Whilst some tree cover can provide important habitat it can result in the loss of emergent habitat and should be considered as possible SMART targets in the Standing Open Water HAP.	Arrange meeting with Hertford County Yacht Club to discuss issues on site and feed into SMART targets in the Standing Open Water HAP
				Our second concern is water level changes. We recognise that some seasonal fluctuations are inevitable but sustained periods of high or low water levels are a problem for us and cause damage to our quay headings. We would not support any Biodiversity Action Plan proposals that compromised the water level control in our area.	There are no water control structures on this site and therefore the water levels cannot be managed.	No Change
	6	River Lea Catchment Partnership		The Section on the areas of rivers Identified in the River Lea Catchment Partnership only goes to Tottenham Lock is the lower lea in another partnership	The London Lea is from the M25 to the River Thames	No Change
	18			Should the Moth section come after the Invertebrates section	Agreed	Move Moth section to after Butterflies section
				Do you want to list all the sites with Crassula	This will be addressed through the mapping stage of the INNS Action Plan	Map sites with Crassula in the INNS Species Action Plan
				You mention the Interp panels at Gunpowder park the bat one needs replacing	Noted	No Change
				Are you adding any pictures	Yes - these will be added in the design stage.	No Change
				How soon do you think you would have the Delivery plan completed	Some of these are already in production. We anticipate that all will be finalised by end of 2018	No Change

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LVRPA	16	Birds	Lapwing have recently bred successfully on Cornmill Meadows and Lee Valley Park Farm.	A pair of Lapwing had young at Glen Faba last year too and there are pairs at Sewardstone?	There have been records for Glen Faba however the status of Sewardstone (Patty Pool Mead) is unknown.	Add text under Birds Section as follows: Redshank and Little Ringed Plover breed at Amwell Nature Reserve and Lapwing have recently bred successfully on Cornmill Meadows, Glen Faba and Lee Valley Park Farm.
	16	Birds	Scrub and woodland habitat is dotted around the valley and provides habitat for Regional Species of Conservation Concern such as Long-eared Owl *(Asio otus)*	Are these still regular at sites in the valley?	There are still recent records for Long-eared Owls but it is noted that they are not recorded as frequently as they once were.	No Change
	21	Invasive Non-native Species		Do you want to mention Ring-necked Parakeet as well?	Agree that they should be mentioned within the INNS Action Plan.	Add text under INNS Action Plan - Current status as follows: Ring-necked Parakeets (*Psittacula krameri)* have increased their distribution across the Lee Valley in recent years. Their impact on native birds is not fully assessed but there are concerns about potential impact on native bird species such as woodpecker, Starling and Nuthatch, through competition for nest holes.
	28	River Catchment Partnerships	There are a number of river enhancement projects proposed through the Catchment Management Plan such as the installation of Eel passes on Holyfield Weir, installation of floating reedbeds in the Lower Lea and the re-wetting of existing channels in the Waltham Abbey Royal Gunpowder Mills.	Is the scheme at Waltham Abbey Royal Gunpowder Mills still progressing?	The scheme at WARGM is dependant on funding but the aspiration is still there.	No Change
	29	Monitoring	A range of ongoing surveys are undertaken on the riverine habitats. These include surveys for Water Vole, Mink and in some locations the BTO's Wetland Bird Survey (WeBS) include the rivers. Certain key stretches of river including the Old River Lea at Cornmill Meadows and Fishers Green have annual electrofishing carried out by the Environment Agency.	There are other surveys taking place such as Herons at Glen Faba, Terns and Gulls at Fishers Green, Barn Owl boxes or is this not meant to be an exhaustive list?	This lists highlights surveys that are taking place specifically on Rivers and Streams.	No Change
	33	Grassland and Fen HAP - Intro	Both wet grasslands and fen meadows provide breeding habitat for wading birds such as Snipe *(Gallinago gallinago)* and Redshank *(Tringa totanus)* while winter floods can attract large numbers of wildfowl.	Also provides habitat for wading birds	Agreed	Add text under Grassland and Fen HAP into as follows: Both wet grasslands and fen meadows provide breeding habitat for wading birds such as Snipe (Gallinago gallinago) and Redshank (Tringa totanus) while winter floods can attract large numbers of both wildfowl and waders.
Green roof shellters				We look after the green space on Clapton Park estate https://www.grassroofcompany.co.uk/socialhousing/ that butts to the lee navigation canal. Be great to have some connection to your work, maybe see if we can link some of the biodiversity work we do with residents with your initiatives. We have applied for some grow wild funding and have some proposals from friends of the earth to add to the biodiversity work the estate is already known for. Working with an Entomologist and UEL we are proposing some solitary bee habitats as part of the funding, might be great to set some up outside the estate as well to compare results. Here is a link to the sand planters and bee posts we are thinking of https://www.thenatureofcities.com/2018/01/09/blandscaping-erases-local-ecological-diversity/	Noted	Arrange meeting to discuss further
				In general, I think the revised BAP is good. The choices of priority habitats and species seem sensible. Of the species, bats, otter and kingfisher are also priority species in the Tower Hamlets LBAP.	Noted and welcomed	No Change
				There are three other Tower Hamlets priority species which would be worth considering as priority species for the Lee Valley BAP, as all are species for which specific action could be taken in the Park. These are common tern, sand martin and European eel. You already undertake a lot of specific action targeted at common terns, with the installation of rafts, and you've also installed boxes/banks for sand martins, so it would make sense to recognise that these are priority species. There are still a number of locks in the Lee Valley which lack eel passes, so there is also specific action possible for eels. Even if the Park Authority doesn't have the resources to install eel passes, recognition of the eel as a priority species would make it easier to get s106 money for this from adjacent developments. Please give serious consideration to adding these three as priority species.	Noted - A revised priority species list has been drawn up and included in the document.	No Change
				I can find no reference to East India Dock Basin in any of the action plans (I think there are only three in the whole document). While I accept that EIDB is far from the most important site in the Park, it is very important for access to nature in its local area, and is probably the most important site for water birds in this borough. The lack of mention in any of the action plans suggests it is very low in the Authority's priorities for biodiversity action. A reference in the open water plan on the need for desilting would be useful. And the kingfisher action plan might include an objective to try to extend the breeding range of kingfishers in the valley with a nesting bank at EIDB. If	Noted	Add text under section Standing Open Water as follows: The areas of standing open water include large flooded gravel pits north of Waltham Abbey, the reservoirs at Chingford and Walthamstow, the filter beds at the WaterWorks Nature Reserve and East India Dock Basin, adjacent to the Thames, as well as smaller ponds and the wetland habitats associated with the water's edge.

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London Borough of Tower Hamlets				the additional species discussed above were added as priority species, then actions for sand martin and common tern could also mention EIDB, as both have been (temporarily?) lost there are breeding species in the last 2 years, and I know you have plans to enhance/repair the nesting structures aimed at these species.		Add text under section Standing Open Water HAP - Lack of management as follows: In the Lower Lea, East India Dock Basin's natural siltation process due its tidal nature has been exacerbated by the complexities surrounding its removal resulting in the loss of standing open water.
				Buttonweed might also get a mention in the invasive non-native species plan.	Agreed	Add text under section INNS - Current status as follows: See alongside changes in response to Fishers Green Sailing Club comments: Canadian Waterweed (Elodea Canadensis) and Nuttalls's Waterweed (Elodea nuttallii) are both present in the valley in particular in the gravel pit lakes. They can form dense mats impeding flow and creating fluctuations in oxygen levels. **Buttonweed (Cotula coronopifolia) is found along the reeded fringe of East India Dock Basin.**
	17			The reference to saltmarsh plants such as sea club-rush, sea beet and sea arrowgrass at East India Dock Basin in probably out of date. I'm not sure any of these are still present, and would be very surprised if the arrowgrass, which is particularly rare in a London context, survives. The cleared are within the reeds is largely dominated by buttonweed (see below).	These species were all identified in the most recent survey dated 2013	No Change
		Plants		Also in the Plants section, I wonder if Jersey cudweed is worth a mention? This protected (W&CA Schedule 8) species has appeared in pavement cracks and bare ground in several places in this borough (and elsewhere in London), including along Silvocea Way beside Bow Creek, where there are hundreds of plants. While this isn't quite in the Lee Valley Park, it's definitely in the valley, and I'd be surprised if it isn't somewhere in the Park. I'm not sure quite what you'd say about it, other than mentioning that, despite these populations almost certainly not being of natural origin, Wildlife & Countryside Act protection still applies.	The area mentioned falls outside the Regional Park boundary. Jersey Cudweed has not been recorded within the boundary of the Park.	No Change
	21			Is it worth adding buttonweed to the list of invasive non-native aquatic plants which are present in the Park?	Agreed	Add text under section Invasive non-native species as follows: The waterways, waterbodies and riparian habitats are susceptible to colonisation by many invasive non-native species including New Zealand Pygmyweed (Crassula helmsii), Giant Hogweed (Heracleum mantegazzianum), Himalayan Balsam (Impatiens glandulifera), Canadian Waterweed (Elodea Canadensis), Nuttall's Waterweed (Elodea nuttallii), Buttonweed (Cotula coronopifolia) and Floating Pennywort (Hydrocotyle ranunculoides).
	24			The first sentence of the section about invasive non-native species is actually about the numbers of all non-native species, not invasive non-native species. The rest of the paragraph correctly indicates that only a small proportion of these ever become invasive. So you need to delete "invasive" from the first sentence. I think all these figures actually refer to plants. If I'm right about that, you need to make that clear. Far fewer animals ever become established, but I would think a far higher proportion of those that do so will become a problem.	Agreed - regarding first sentence. I believe this figure is for all invasive species.	Amend text under section Invasive non-native species as follows: There are nearly 2000 ~~species of invasive~~ non-native species ~~(INNS)~~ established in the UK, with a trend of 10-12 new species becoming established each year. And amend text under section Invasive Species SAP - Introduction as follows: There are nearly 2000 species of non-native species ~~INNS~~ established in the UK with a trend of 10-12 new species becoming established each year. It is thought that 10-15% of these cause significant adverse impacts .
	27			Add Chinese mitten crab to the section on invasive non-native species?	The data search of biological records found no record of Chinese Mitten Crab within the boundary of the LVRPA	No Change
Herts & Middlesex Butterfly Conservation	9	Monitoring	Monitoring of progress is important both within the specific action plans and the document as a whole. An annual progress report for the Biodiversity Action Plan will published on the LVRPA website	Butterfly Conservation already record in the area with both casual and Transect recording and we will continue to do this	Noted	LVRPA Conservation Manager will contact the group to ensure two-way transfer of records.
	15	**Urban (especially post-industrial habitats)**	The newly created brownfield habitats of the Queen Elizabeth Olympic Park, have already established themselves as important areas for many species, in particular the invertebrate assemblage.	Are these really Brownfield as they have been developed. Do we know what was on these sites when they were brownfield compared to what is there now.	These are perhaps not brownfield sites in their purist form but have been planted to replicate this habitat and therefore are classed as such.	No Change

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Cambs & Essex Butterfly Conservation	18	Moths	There has not been widespread moth monitoring undertaken in the valley and therefore it is likely that as with other species they are under-recorded. However over 700 species have been recorded of which 51 are UK priority species and 105 are regionally important. Many UK priority species are still widely distributed but are classed as priority species to stimulate research. The Latticed Heath (Chiasmia clathrata) and Cinnabar Moth (Tyria jacobaeae) are widespread across the grasslands of the valley as is the Garden Tiger (Arctia caja) identified a priority species primarily due to the decline since the 1980's. Many of the UK priority species are found across a range of habitats with obvious close associations to specific food plants. The large expanses of wetlands mean that they are of particular note for a number of reedbed specialists including the Regional Species of Conservation Concern including Reed Dagger (Chilo phragmitella), Fen Wainscot (Arenostola phragmitidis), Brown-veined Wainscot (Archanara dissoluta), Reed Veneer (Chilo phragmitella), Pale Water-veneer (Donacaula forficella), Scarce Water-veneer (Donacaula mucronella) and the Giant Water-veneer (Schoenobius gigantella).	The plans for Reedbeds, fens and woodland should help to benefit the specialist moths in those habitats. Agree that more moth monitoring is needed. Garden Tiger is not widespread on either side of the valley.	Comments regarding habitat management and monitoring noted. Garden Tiger has been recorded in 6 of the 1km squares in the Lee Valley, the text is amended to reflect this.	Amend text under section Moths as follow: The Latticed Heath (Chiasmia clathrata) and Cinnabar Moth (Tyria jacobaeae) are widespread across the grasslands of the valley ~~as is the~~ and the Garden Tiger (Arctia caja), occasionally recorded is identified a priority species primarily due to the decline since the 1980's.
	20	Butterflies	The mosaic of habitats found across the Lee Valley provide habitat for a range of butterfly species with 34 species recorded. This includes five UK priority species including the White-letter Hairstreak (Satyrium w-album) found amongst others in the Elm (Ulmus minor 'Atinia') hedges of the Lee Valley Park Farm and Cornmill Meadows, and the Small Heath (Coenonympha pamphilus) as well as the less common White Admiral (Limenitis camilla), Brown Hairstreak (Thecla betulae) and Wall (Lasiommata megera).	Planting of disease resistant elms and maintenance of existing elm suckers to benefit White-letter hairstreak. Encouragement and appropriate maintenance of Sallow to encourage Purple Emperor. Woodland maintenance to encourage dog violet for Silver-washed Fritillary. White Admiral (Limenitis camilla) is not found in the Park area on either the Herts,Middx or Essex areas. Brown Hairstreak (Thecla betulae) there is just one record from 2014 on Walthamstow Marshes. Suggest avoid flailing of Blackthorn hedgerows, etc. Layering preferred where Blackthorn needs to be controlled. Wall (Lasiommata megera) is not now recorded in any part of the Park area and is absent from a much wider area.	Management recommendations noted. All species noted have been recorded in the Park highlighted through the data search. Text to be amended to reflect status.	Amend text under section Species Review, butterflies as follows: The mosaic of habitats found across the Lee Valley provide habitat for a range of butterfly species with 34 species recorded. This includes five UK priority species including the White-letter Hairstreak (Satyrium w-album) found amongst others in the Elm (Ulmus minor 'Atinia') hedges of the Lee Valley Park Farm and Cornmill Meadows, and the Small Heath (Coenonympha pamphilus) as well as the ~~less common~~ occasional Wall (Lasiommata megera) at Gunpowder Park and the individual sightings of both Brown Hairstreak (Thecla betulae) at Walthamstow Marshes and White Admiral (Limenitis camilla). ~~, Brown Hairstreak (Thecla betulae) and Wall (Lasiommata megera).~~
			There are five Regional Species of Conservation Concern have been recorded including the Brown Argus (Aricia agestis) and Marbled White (Melanargia galathea). Species such as Essex (Thymelicus lineola) and Small Skipper (Thymelicus sylvestris) are declining locally but are still widespread in the grasslands of the valley alongside commoner species such as Gatekeeper (Pyronia tithonus) ,Meadow Brown (Maniola jurtina) and Common (Polyommatus icarus) and Holly Blue (Celastrina argiolus). Silver-washed Fritillary (Argynnis paphia) has been recorded and is known to be increasing locally, migrant species including Painted Lady (Vanessa cardui) and Clouded Yellow (Colias croceus) are recorded regularly and there are occasional vagrants such as a Long-tailed Blue (Lampides boeticus) recorded at East India Dock Basin in 2012.	The migrant butterflies will be recorded whatever the management of the park so should not be noted separately as a BAP plan will have no influence over their occurrence. The same applies to vagrants (possibly accidental imports).	The purpose of this section of the Biodiversity Action Plan is to provide an overview of the butterflies found in the Park and therefore the migratory and vagrant species are worth noting.	No Change
	40	Invasive non-native species	As is true of most habitats the presence of invasive non-native species can have a negative impact on the habitat quality. Oak Processionary Moth (Thaumetopoea processionea), found since 2014 at the Lee Valley Velo Park can have serious implications for oak (Quercus spp.). The defoliation caused by the feeding caterpillars can leave the trees vulnerable to disease or attack, whilst they preferentially eat oak leaves they will move onto other trees once that food source is exhausted.	Also public health issues. Could the Gypsy moth be a defoliation problem here as it is certainly spreading in Middlesex and south Herts.	Agreed	Add text under section INNS - Current status as follows: Gypsy moth (Lymantria dispar) has also been recorded in the Lee Valley and can cause serious defoliation of trees, putting the tree under stress and possibly leading to its death.
					Information added on Oak Processionary Moth (see comment from EA)	Add text under section INNS Action Plan - Current status as follows: Oak Processionary Moth (Thaumetopoea processionea) was first reported at the Lee Valley Velopark in 2014 and is currently closely monitored and treated annually. The Oak Processionary Moth poses a risk to public health due to varying degrees of irritation caused by exposure to their hairs.

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	43	**Creation of new urban habitats**	The development of the Queen Elizabeth Olympic Park has seen 4.2ha of brownfield habitat created, although the challenge is to try and maintain these areas in an early successional stage through management practices. These areas have additional features within them such as the Toadflax Brocade Moth *(Calophasia lunula)* beds which are designed to replicate the coastal shingle beds of southern England where it first colonised the country.	Toadflax Brocade is now widespread wherever Purple (and Common) Toadflax has become established (such as gardens) and as such probably does not require habitat creation.	These toadflax beds were installed as a part of the post-2012 Olympic design. It is anticipated that they will be maintained to continue to provide habitat on site.	No Change
				There are no local colonies of Grizzled Skipper, Dingy Skipper or Small Blue but it is possible that creation of suitable habitat could encourage colonisation from Herts side. Small Blue has been recorded at Tower Hamlets Cemetery Park, Grizzled Skipper is found on brownfield sites in the Beane Valley. The Dingy Skipper is not found in east Hertfordshire but can use brownfield sites such as Brick Pits and we should never under estimate the ability of seemingly small butterflies to discover new sites.	Noted	Consider possible expansion of ranges when devising Grassland and Fen and Built Environment SMART targets
Individual				I wonder if adjustments and checks might be made to some of the target birds for conservation regarding realistic present status and perspective? What are reasonable conservation targets for breeding birds - red-list species know to be present annually during the breeding season, or birds that are no longer known to be breeding?	The list of Priority Species in the Lee Valley has been updated. It is anticipated that species that don't have an individual SAP could have specific targets in the relevant HAP or their own SAP as time progresses.	No Change
				What is the likely breeding or other status over the last few years of the following birds mentioned in the plan? Are they still present as breeding birds these last few years? Are they being monitored in some way? Turtle dove (seemed in the past to use scrub for breeding, farmland for migration), Tree Sparrow, Lesser-spotted Woodpecker	These are now all included in the Lee Valley Priority Species list. No specific monitoring at present however we are revising monitoring schedule for certain areas of the Park	No Change
				Some red-list species I am aware are still present and use the Lee Valley - such as Linnet, Yellowhammer and Skylark. As you probably know, I am concerned that the effectiveness of some of the publicly funded agri-scheme options has been poor, not giving best value for public money nor the target species. Is this a real-world option which should be included in the BAP - an aim to have effective use of stewardship regarding over-wintering seed-crops. That could reasonably be argued to be a worthy part of any BAP where it is acknowledged to have been less than successful previously.	These species will now be on the Lee Valley Priority Species list. Agri-environment schemes in the Park will be noted.	No Change Add text under Section Landscape scale conservation as follows: Agri-environment Schemes Agri-environment schemes provide funding to farmers and land managers to farm in a way that supports biodiversity, enhances the landscape, and improves the quality of water, air and soil. The objectives of the current Environmental Stewardship scheme include: • Wildlife conservation (biodiversity) • Maintenance and enhancement of landscape quality and character, by helping to maintain important features, such as traditional field boundaries • Protection of the historic environment, including archaeological features and traditional farm buildings • Promotion of public access and understanding of the countryside • Natural resource protection – if taken up across large areas of the countryside, it will help to improve water quality and to reduce soil erosion and surface run-off. There have been a number of agreements across land-holdings in the valley which can provide targeted enhancements for biodiversity. The availability of funding and range of options available can impact on the effectiveness of these schemes.
				Sand martin - I think this species was mentioned in the London BAP, and your draft mentions eroding banks as nesting sites. I think the main nesting sites in the valley in Enfield are the drainage holes from the KGV & WG reservoirs into the relief channel, and some in pipe holes along the canal 'walls' . Possibly similar additional holes could be provided into the vertical banks of the navigation, or through other methods - maybe that is being done elsewhere in the valley to the south ~ maybe it could be a future aim.	Sand Martin is now on the revised Lee Valley Priority Species List. There is not a dedicated SAP for them however actions such as this will be picked up through the HAP's	Include action for Sand Martins in the Rivers and Streams HAP
				Cornmill - would it be possible to manage the water levels with more variability - more flooding then lowering, as they had been in the past - there seemed to be a greater diversity of waders and migrating birds coming through Cornmill in past Springs and Autumns than in recent years, plus breeding Redshank, and previously Common Snipe as well. The meadows haves seemed rather sterile for bird activity over the last decade compared with previously.	There is a developing plan for waders in the Lee Valley which will help address these concerns.	Add text under section Landscape Scale Conservation as follows: Lee Valley Wader Strategy Started in 2016, the Lee Valley Wader Strategy draws together key organisations and land-owners in order to try to address the identified decline or loss from specific sites of breeding waders in the valley over time as the habitats have matured. It is recognised that the management of reserves in isolation is not the most effective method to reverse this decline and that a co-ordinated, landscape-scale approach would see the best results.

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				I think the butterflies need better perspective as to what is certainly established and of particular conservation interest. Are White Admiral (Limenitis camilla), Brown Hairstreak (Thecla betulae) and Wall (Lasiommata megera) all present as resident species? Would be good to identify key sites for scarce/conservation grassland species - common blue, small copper, small heath, brown argus and marbled white - and ensure they are suitably managed.	Key sites to be picked up through both site management plans and the HAP's. Descriptions of species changed to reflect status.	Amend text under section Species Review, butterflies as follows: The mosaic of habitats found across the Lee Valley provide habitat for a range of butterfly species with 34 species recorded. This includes five UK priority species including the White-letter Hairstreak (Satyrium w-album) found amongst others in the Elm (Ulmus minor 'Atinia') hedges of the Lee Valley Park Farm and Cornmill Meadows, and the Small Heath (Coenonympha pamphilus) as well as the ~~less common~~ occasional Wall (Lasiommata megera) at Gunpowder Park and the individual sightings of both Brown Hairstreak (Thecla betulae) at Walthamstow Marshes and White Admiral (Limenitis camilla). ~~, Brown Hairstreak (Thecla betulae) and Wall (Lasiommata megera).~~
				Brimsdown Marsh between the KGV reservoir and the canal holds I think a good array of original marshland plants, including marsh marigold and meadow cranesbill, and some old ditches are still present. Maybe it isn't in the park directly, but might a consideration in the LVRPA BAP, as I think the LVRPA commissioned a plant survey some time ago with positive results. As original Lea Valley floodplain meadow, should it be recognised as a site of local interest for nature? it's doesn't appear to be on the BAP list. Previously there seemed to be some consultation and discussion of planting it with trees or landscaping it in some way - its origins and values had not been recognised in the document (maybe 10 yrs ago?). I would be interested in receiving a copy of the plant survey results	This area forms part of the Lee Valley SMINC (locally designated site). There is a botanical survey undertaken in 2005 (Brian Wurzell) we would be happy to share this with you.	Forward survey to A.Middleton. Find out who owns this site and speak to them regarding management.
				Promote existing and develop new opportunities for volunteers to contribute towards the protection and enhancement of biodiversity in the Regional Park I would still like to be involved in the farmland & bird plans and monitoring. I am so far disappointed that I have not been contacted regarding a meeting or monitoring as suggested two months ago - spring will soon be here - and that I only have repeated Linkedin emails generated from Stephen Wilkinson's Linkedin account, but no direct contact. Does my personal experience relate positively to the BAP cross-cutting theme of Engagement with stakeholders and communities as given above? Should the BAP have a stated clear pathway for stakeholders and communities to raise any concerns they may have with ongoing management related to biodiversity?	Noted - we have now been in discussion regarding farmland birds.	Insert contact details in final document
RSPB				We thank you for the considerable time and effort you have applied to its formation and we are happy to support the broad approach that has been outlined.	Support noted and welcomed	No Change
				May we suggest that the following species are added to table 5 on page 24 (bittern, shoveler, gadwall and lapwing). By developing SMART objectives for these species, this will serve to drive management throughout the valley. We are of course, happy to assist in their formation.	The Priority species list has been revised. It is anticipated that actions for waterbirds will be picked up through the Standing Open Water HAP and Lapwing through the Grassland and Fen HAP and therefore do not have their own SAP currently - this could be revised in the future if it is considered necessary. Bittern had its own SAP in the previous BAP and it is continued in this version.	No Change
				With the introduction of a new Plan, this is also a time to review what was achieved under the previous iteration and to overcome any barriers to the threats which have been identified, e.g. natural succession affecting shallow, open water.	Noted - consider barriers and threats in the development of the SMART targets	Review previous outcomes and consider barriers and threats in the development of the SMART targets
				As part of the strategic development to achieve the objectives set out in the Plan, we would be interested to know more about the funding mechanisms in place to ensure their deliverability.	Funding is always difficult to predict. It is anticipated that some targets can be met through government initiatives such as agri-environment schemes, grant awards or in-house organisational funding, planning obligations and volunteering. Potential funding streams could be identified when the SMART targets are drawn up.	Identify potential funding streams alongside SMART targets.
	16		Little Plover	Should read Ringed Plover	Typo Noted	Amend text under birds as follows: ~~Little~~ Ringed Plover
				Overall I'd say that this is a poor consultation draft that is missing many key elements of a good plan, notably maps and data, that would give the consultee a much better idea of the spatial and temporal distribution of biodiversity and habitats etc within the LVRPA area.	Whilst it would have been useful to have the maps included this was not possible - some maps will be present in the final document, others will be delivered through the SMART tragets.	Include maps in the final document where available and note mapping in the SMART targets where required.
				The Vision statement uses the words "create, restore and enhance" but is missing the key word "protect" - you could interpret this as being a situation where you can create a small amount of habitat within the LVRPA area, you could restore and enhance a few areas, but you could lose large areas by developing on them (for example).	Agreed. Whilst this was not previously stated explicitly the aim was always to conserve habitats in the Lee Valley.	Amend text under section Vision as follows: Vision The overarching vision for the Lee Valley Regional Park Biodiversity Action Plan is to work with partners and communities to conserve, create, restore and enhance the habitats of the Regional Park, providing access to and appreciation of this area. Amend text under section Objectives as follows: Objectives I. To conserve, create, restore and link characteristic ecological, hydrological and landscape features to form a fully integrated river floodplain corridor

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Individual				In the opening blurb on the website, it is stated that SMART targets will be developed. None of the objectives on page 1 are SMART, and very few (if any) of the objectives within the individual Action Plans are SMART	Overall aims and objectives have been set for each of the Habitat and Species Action Plans. Following the adoption of the document working groups will be set up to develop dynamic SMART targets for each plan. These will be adapted and reviewed throughout the life of the BAP.	No Change
				5) Page 15 - 21 where the plan goes into more detail of the species present is not very helpful and user-friendly. There should be a much greater use of tables to enable the reader to understand the important species that occur. Tables could easily include the Conservation Status of the species, eg for birds this is very simple using the red-lists produced by RSPB/BTO/Statutory Agencies: https://www.bto.org/science/monitoring/psob For birds it is easy to add European status and even global status for some species that occur in the LVRPA area eg Pochard which is now globally Vulnerable and is of particular conservation concern. Within these tables there should be an assessment of numbers that occur within the LVRPA area, and certainly for birds these should be available from local recorders/stakeholders that will be known to the LVRPA team. I've focussed on birds, but the sections on all the other taxa could be improved by using tables with more details. For example, the mammals section says "Of the 33 species of mammal recorded in the Regional Park 10 are European Protected Species and nine are UK Priority species and 14 are regionally classed as Regional Species of Conservation Concern". Tabulating the 33 species and adding columns that show which are European Protected Species, UK Priority Species etc would be more informative.	Noted - a full species list will be included in the final document. Included in this is an indication of the distribution of the species in the LVRP boundary. There are varying levels of monitoring effort and therefore it should only be seen as an indication.	Include species list in final document
				6) For invertebrates should add as a table at least the RDB species, and it would be a hugely important guide to add a column with the main habitat that each species occurs in, thus helping identify suitable management activities etc (which aren't really identified later in the document).	Noted - the priority species listed in Appendix Two will also note their association with priority habitats.	Include habitat associations in Appendix Two. Amend text under section Priority Species as follows: Work to enhance the identified Priority Habitats will benefit the associated Priority Species, these associations are noted in Appendix Two. From this priority list a number of Species Action Plans ~~are~~ have been considered for species which require conservation effort that cannot easily be covered by an appropriate Habitat Action Plan or for species that are good indicators of the quality of habitats. Species Action Plans are also useful as a mechanism for engagement where projects specifically focusing on a species will raise the profile of biodiversity conservation in the Lee Valley Regional Park.
				7)) Adding some population data and numbers to the sections on pages 15-21 would also help with the development of SMART objectives and targets. There must be population trend data for some species, notably the bird species.	We will include the full species list obtained from the Local Environmental Records Centres in the appendix, this should include some info on distribution. The species with action plans will have distribution maps included in the plan.	Include distribution maps in the each SAP
				8) There must be a series of reports and surveys that have been undertaken to produce the information on pages 15-21 and these should be included (an appendix or reference section) so the user of the plan can refer to these if required.	The data from the report came via the data agreements with the Local Environmental Records Centres as noted in the document. This includes data from various sources including surveys carried out by LVRPA which are provided to the LERC's. Reports held by LVRPA can be made available (with certain precautions around sensitive data) on request.	No Change
				9) The justification for continuing individual species action plans seems to be a strange one. We'll continue to focus on these species because we always have!! Bittern is an important species but its conservation status has improved dramatically in the last decade due to conservation efforts and it has recently been down-listed from red to amber (see the above link to red-list). So maybe LVRPA should look at this a little more critically and focus on other species that are declining. Had the existing population data been better presented on pages 15-21, then high priority species that are declining may have been identified.	Landscape scale management of priority habitats will have the most positive impact on the priority species however as noted in the document certain species need more targeted action, are good indicators of the quality of habitat or offer excellent engagement and awareness raising opportunities. A longer list of priority species has been produced and in the future further action plans could be drawn up.	No Change
				10) It is unclear to me why LVRPA have added Creeping Marshwort, Barbel and Invasive Non-natives as requiring specific focus but not other species. What process has been undertaken to justify these new additions? (maybe I missed it but I can't see how this was reached).	These additions reflect certain changes since the last plan. Species Action Plans cannot be produced for all species but those without plans can be addressed through the Habitat Action Plans.	No Change
				11) Expanding on the above point. Barbel has been included as a new species and the justification appears to be it is a good species to engage fishermen and the general public! Whereas the European Eel is globally red-listed and from a conservation point of view is vastly more important and the species can be a real conservation driver for habitat restoration and management.	It is anticipated that actions for European Eel will be undertaken via the Rivers and Stream HAP, continuing the work already being undertaken in the Lea Catchment.	No Change

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				12) I question the addition of Invasive Non Native Species (INNS) as requiring a local biodiversity action plan and that they are included within this document. As with many urban areas INNS can be a real problem and need a real focus if they are to be tackled effectively. I suggest that INNS should be taken out of the plan and a separate more comprehensive plan developed for tackling INNS in the LVRPA. I would suggest that INNS is a cross-cutting theme. The current Action Plan for INNS seems rather meaningless as it currently stands. There needs to be some sort of prioritisation exercise to identify those that are really important within LVRPA area. But, as above, I'd suggest that a separate plan is required to do this justice.	It is anticipated that the Species Action Plan will provide the framework for the management of INNS in the valley. The SMART targets drawn out of the SAP will focus the delivery of action for management of the INNS. Action targeting specific INNS will need to be prioritised according to their impacts, distribution and response to management.	No Change
				13) I've not had the opportunity to go through each separate Action Plan that make up pages 26 onwards in detail. But the cursory review reveals few if any SMART aims, objectives or indeed any specific targets at all.	The SMART targets will be a set out in attachments to the Species and Habitat Action Plans, this will make the documents more dynamic.	No Change
				14) For most of the plans there is an objective to understand the current distribution of species/habitat xxx. Surely this information already exists for some species/habitats and could easily be mapped and provided within this document? Eg booming bitterns and wintering bitterns will be known, water voles/otters must have been surveyed at some point in the last 10 years (ie during the last cycle of the existing Action Plans). Locations of bat roosts must be known?	Noted - we will include distribution maps in each action plan	include distribution maps in the each SAP
				15) Within the individual Action Plans it mentions the objectives (non-SMART) but gives no associated activities to achieve these. If you want to achieve objectives you need some ACTION!!	The SMART targets will be a set out in attachments to the Species and Habitat Action Plans, this will make the document more dynamic. These targets will be drawn up in conjunction with stakeholders.	No Change
				These are all very general points that I hope are of use. I would have liked to have had time to have gone through the specific details of each Action Plan, but to be honest without better SMARTer objectives and associated activities that is difficult at this stage. I find this document heavy on information and light on Action - unfortunately that is rather typical of many Action Plans I see.	Noted	No Change
Save Lea Marshes				Firstly, we welcome the opportunity for local people to comment on the Lee Valley Regional Park Authority's plans relating to biodiversity, as this is something that has not happened as much as we would have liked in the past. There are, however, a number of issues with the plan as it currently stands.	Noted	No Change
				This 'plan' contains many words describing the historical context and the current situation and very few words explaining exactly what you are planning to do. It is also missing all the maps. And without a clear understanding of exactly what you are planning to do - what your vision is and how you intend to move from the here and now towards that vision - it is almost impossible to provide cogent feedback (or, I would have thought, create SMART targets). The devil is in the detail, and we simply do not have the detail to comment on. To take just two examples:	Noted - the draft document noted what maps are planned to be added to the final document. The document aims to provide overall aims for priority species and habitats, the SMART targets will follow in each of the Action Plans.	No Change
				You state, 'This species [creeping marshwort] will benefit from special management aiming to increase its cover, prevent it from being ousted by more vigorous competition and buffer it from extreme changes in water levels.' Again, we might have been able to comment on the effectiveness - or otherwise - of your proposals for managing this species if you had provided them.	The specifics of the management will be developed by the emerging Creeping Marshwort SAP group.	No Change
				You state that you want the community involved, but you do not mention how you intend to do this. As a group that represents the local community, we wanted to be able to comment on how likely your actions are to succeed, but we do not know what they are.	Noted and agreed that the current document does not address how this will be specifically undertaken, but does note that this is the aim. The Authority will ensure that local organisations are made aware and given the chance to comment on the actions as was the case for the BAP document.	Amend text under section A Biodiversity Action Plan for Lee Valley Regional Park as follows: The cross-cutting themes, Species and Habitat Action Plans in this document provide the overarching aims and objectives for delivery however detailed SMART targets for each plan will be developed in partnership with key partner organisations following the formal adoption of the plan. Ensure that Action Plans are made available for comment by stakeholders.
				This plan does not explain how you intend to uphold the values of the biodiversity action plan in the face of conflicting pressures from other parts of the LVRPA. How will biodiversity be protected from, for example, plans to hold events on land managed as meadow or plans to sell off large swathes of green space for development?	Having an adopted Biodiversity Action Plan and the SMART targets in the action plans to follow will provide a source of information and evidence against which to assess the merits and impacts of proposals alongside the other benefits (leisure facility or monetary gain) that the development or proposed use might secure. The outlining of clear objectives for habitats and species within the valley as a whole can only help to focus attention on the importance of these areas.	No Change

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				It was challenging to determine why you have chosen to focus on the species and habitats you include in the plan. What is your rationale for including them? Your starting point, in most cases, seems to be to understand current distribution, but surely you already have such information to justify the inclusion of a species or a habitat? If not, would it not be worth taking a further step back and examining the diversity of species and habitats across areas of the park first, and then deciding which need their own action plans? If you do have such information, we would have liked to see it in the plan. Similarly, there is very little mention of the conservation status of the species and habitats that you mention, making it challenging for a lay person to determine whether or not your priorities should be challenged. For example, Barbel has been included because it is a good species to engage fishermen and the general public, whereas the European Eel - which you acknowledge is globally red-listed and is, from a conservation point of view, much more important - is not a priority for you.	The Priority Habitats reflects those identified at a national level. The addition of the Priority Species list in Appendix Two gives focus to the conservation work of which much will be met through the Habitat Action Plans. A good example is the European Eel which will be addressed through the Rivers and Stream HAP. A certain number of species that need more targeted action, are good indicators of the quality of habitat or offer excellent engagement and awareness raising opportunities will have their own SAP's.	No Change
				This plan lacks a commitment to manage invasive non-native species without recourse to spraying pesticides and herbicides.	INNS will be tackled using the most appropriate management tool, the use of pesticide is not ruled out as it can often be the most effective method. Not all management undertaken currently utilises pesticides a good example noted is the management of Azolla using the Azolla Weevil.	No Change
				Save Lea Marshes would welcome further and fuller opportunities to engage in a meaningful way in developing a robust biodiversity action plan, that puts biodiversity and the protection and celebration of nature at the heart of the Lee Valley Regional Park's vision, and look forward to hearing from you.	Noted	Ensure SLM is included on consultation list
London Wildlife Trust	7	***A Living Landscape - The Wildlife Trusts***	The Wildlife Trusts have identified over 100 Living Landscapes around the UK. This recovery plan was launched in 2006 to restore, recreate habitats and reconnect people to wildlife. The Lee Valley is identified as a Living Landscape by the three local Wildlife Trusts, Herts and Middlesex, Essex and London.	insert at end : These are mostly being implemented through discrete projects to contribute to the greater whole, for example Walthamstow Wetlands, opened in 2017.	Agreed	Add text under A Living Landscape - The Wildlife Trusts as follows: 'The Wildlife Trusts have identified over 100 Living Landscapes around the UK. This recovery plan was launched in 2006 to restore, recreate habitats and reconnect people to wildlife. The Lee Valley is identified as a Living Landscape by the three local Wildlife Trusts, Herts and Middlesex, Essex and London. These are mostly being implemented through discrete projects to contribute to the greater whole, for example Walthamstow Wetlands, opened in 2017. These are mostly being implemented through discrete projects to contribute to the greater whole, for example Walthamstow Wetlands, opened in 2017.'
	7	All London Green Grid (ALGG)	The ALGG is the Greater London Authority led Green Infrastructure strategy for London identifying a wide range of functions that can be delivered by a healthy natural environment including adaptation to climate change, conserving biodiversity and increasing access to nature. The ALGG has 11 Area Frameworks of which the Lea Valley and Finchley Ridge is one.	insert at end: The ALGG is due for review as part of the revised London Plan, due for adoption in 2019.	Agreed	Add text under All London Green Grid (ALGG) as follows: The ALGG is the Greater London Authority led Green Infrastructure strategy for London identifying a wide range of functions that can be delivered by a healthy natural environment including adaptation to climate change, conserving biodiversity and increasing access to nature. The ALGG has 11 Area Frameworks of which the Lea Valley and Finchley Ridge is one. The ALGG is due for review as part of the revised London Plan, due for adoption in 2019.
	page 7 and 8	A Bap for the regional Park		We recognise that there is still a London BAP, but there's been no update of it since 2008. However, it might be useful to reference habitat restoration and creation targets, currently embedded in the London Plan, will feature in the Mayor's Environment Strategy (including targets for rivers and streams) .	Agreed	Amend text under section as follows: Consideration of the BAPs for Hertfordshire, Essex and London and the incorporation of their appropriate targets into the Lee Valley Regional Park BAP will ensure that the partnerships delivering the BAP not only effectively conserve biodiversity within the Park but contribute towards wider initiatives throughout the region. The targets for London set out in the London Plan (2016) have been reviewed and updated for the draft London Environment Strategy. This approach will also help to ensure that action to enhance biodiversity within the Regional Park is relevant and adds value to initiatives surrounding it. This is essential given the Regional Park's strategic position within the Lea Catchment NIA, River Lea Catchment Partnership, Thames Gateway and the Green Arc.
	13	Biodiversity of Lee Valley Regional Park		Change to : Much of the land in the lower Lee Valley has at some point seen some form of urban regeneration. The most notable example of this is the redevelopment around Stratford for the delivery of the London 2012 Olympic Games. The construction of the Queen Elizabeth Olympic Park required the creation of over 45ha of biodiversity-rich habitat equivalent in 'value'to a Site of Borough Importance for Nature Conservation.	Agreed	Amend text under The biodiversity of Lee Valley Regional Park as follows: Much of the land in the lower Lee Valley has at some point seen some form of urban regeneration. The most notable example of this is the redevelopment around Stratford for the delivery of the London 2012 Olympic Games. The construction of the Queen Elizabeth Olympic Park saw the creation of over 45ha of ~~biodiversity habitat.~~ biodiversity-rich habitat equivalent in 'value' to a Site of Borough Importance for Nature Conservation.
	14	Woodland		Suggest title is 'woodland and scrub'	It is noted that scrub is an important habitat however the BAP habitat as it stands reflects local and national priorities. Targets for scrub managemen can be brought in through SMART targets in HAP's and SAP's.	No Change

Organisation	Page Number	Section Title	Current text	Comments	Response	Action
	15-16	Birds		You may wish to refer to the return of peregrine falcon to the lower valley, and that the area also supports kestrel, marsh harrier and common buzzard.	Agreed	Add text under section Birds as follows: A number of birds of prey have been recorded in the Lee Valley including the Regional Species of Conservation Concern Marsh Harrier (Circus aeruginosus), Peregrine Falcon (Falco peregrinus) and Hobby (Falco subbuteo) a summer visitor.
	16		typo	Water Whorl-grass *(Catabrosa aquatic a)*	Typo Noted	Amend text under section Plants as follows: (Catabrosa aquatica)
	18-19	dragonflies		willow emerald damselfly also recorded in London Lee Valley environs in 2016.	Noted	Add text under Dragonflies Section as follows: The newest species recorded in the valley is the Willow Emerald Damselfly (Chalcolestes viridis) first recorded in 2014 at Amwell Nature Reserve and confirmed breeding at Cornmill Meadows in 2016, it is also now recorded in the Lower Lea.
	20	mammals		Might be worth referencing hedgehog, Walthamstow Wetlands could be a London 'hotspot' following surveys in 2016. The Trust's Urban Urchins project is doing more this year to find about the status of hedgehog here. The recent report on the state of the UK"s hedgehog population suggests that urban populations might be stabilising and/or are a place to focus conservation effort.	Agreed reference Hedgehog in text.	Add text under section Mammals as follows: Hedgehog (Erinaceus europaeus), a Regional Species of Conservation Concern is present in the valley and recent surveys have shown areas of the Lower Lea to be an important area for them in London.
				Given the concerns over hedgehog, we wonder whether this should also be subject of a new Species Action Plan (p24)? We can draft one if you think there is a place for it, although the focus over the next few years should be about getting a more accurate assessment of their distribution across the Regional Park	We have recently started surveying for hedgehogs on our sites; we could assist in the drawing together of information on their distribution. Once this has been undertaken a review can be undertaken as to if an additional action plan should be drawn up or targets added into an existing HAP.	Contact LWT regarding surveying of Hedgehogs
	26	Rivers and streams HAP - Intro	Rivers in their natural state are dynamic systems capable of carrying varying volumes of water and changing course over time as banks erode and sediment is removed, or deposited, much of this dynamism has been lost from the River Lea with	insert shifted: Rivers in their natural state are dynamic systems capable of carrying varying volumes of water and changing course over time as banks erode and sediment is removed, shifted or deposited, much of this dynamism has been lost from the River Lea with	Agreed	Amend text under Rivers and streams HAP - Intro as follows: Rivers in their natural state are dynamic systems capable of carrying varying volumes of water and changing course over time as banks erode and sediment is removed, shifted or deposited, much of this dynamism has been lost from the River Lea with
	30 to 33	Standing Open Water HAP (p30-33) Under the current actions: Zonation of recreational use Management Plans Monitoring		We suggest it is worth seeking to get a cross-Valley approach to this. With the opening of Walthamstow Wetlands, and the desire to push for greater access to the valley's waterbodies, there is a need to have a high degree of co-ordination of site management and monitoring, given the birds that use the reservoirs and other waterbodies (for which they have been designated as SSSI/SPA/Ramsar) will be sensitive to that disturbance. Sharing best practice is acknowledged but perhaps there is need for a higher level strategic approach on the birds' status of the SPA/Ramsar?	Noted and agreed	Arrange meeting to discuss with LWT
	59 to 62	INNS SAP		The Trust has recently ratified its Canada Goose policy, primarily drafted for Walthamstow Wetlands; a copy is attached.	Noted	No change
	27	Rivers		We're pleased to see a reference to the value of the Old River Lea south of Lea Bridge Road (p27). The river passes along the east of the main Marsh and then between the main and east marshes. This reach is perhaps unusual in the Inner London Old Lea in keeping its soft banks, which change markedly with erosion and silting. It used to be tidal until the barrage installed as part of the Olympic developments, on the pretext that construction materials would be brought in by water, which didn't happen. As fas as we know there is no assessment of the loss of this ecological feature. Floating pennywort has increased and we would like to ask whether there may be a connection with the barrage. We also suspect that the river level is generally lower than when it was tidally filled. Grey heron and cormorant are always present and little egret occasionally. Wintering waterfowl (2017-18) include teal, dabchick, tufted duck, wigeon and pochard, and in previous years shoveler and gadwall. A kingfisher is always present. The reach is popular with fishermen and we believe black bream still spawn here despite the barrage.	Noted - Black Bream has not been reported to GiGL if there is a positive record it would be useful to submit this data to them. EA may have data on the changes to the Lower Lea due to the barrage, this could be raised through the development of the SMART targets for Rivers and Streams.	Speak to EA regarding the impacts of the barrage.
		Woodlands and orchards		There are community orchards at Hackney Community Tree Nursery (on the marsh), also at Millfields Park (51 trees), Springfield Park and Spring Hill. Another at Daubeney Fields is on the other side of the Navigation from the marshes and though not part of the LVRPA is ecologically continuous with it. The newest orchard is on Mabley Green which is part of the common land of the marshes but not within the LVRP. These have all been planted in the past 20 years by park user groups supported and advised by the local tree volunteer group, the Tree Musketeers. They are pruned, watered and mulched by these volunteers who have also negotiated with LBHackney parks department on landscape management around them, such as relaxed mowing regimes. The Community Tree Nursery runs a free public apple grafting workshop every winter using scions from the orchards.	Noted	Add text under section Woodland Habitat Action Plan, Current status as follows: In the Lower Lea Valley a number of community orchards have been created on London Borough of Hackney open space by community action supported by the Tree Musketeers, a local tree volunteer group. These orchards are found at Hackney Community Tree Nursery, Millfields Park, Springfield Park and Spring Hill, complementing adjacent orchards located outside the boundary of the Regional Park.
				The mixed deciduous woodland edges of the marsh have been thickened in the past 20 years by volunteer organised plantings (Friends Wood, Kingfisher Wood, Chestnut Wood). This has extended the SINC. Unfortunately the plantings were interrupted for nearly a decade because of the loss of east marsh to the Olympic coach park 'transport mall' which resulted in more space on the main marsh being taken for sports pitches. LB Hackney nevertheless commissioned plantings by contractors which were planted in an inappropriate commercial forestry grid pattern, often too closely spaced and some even within the canopies of existing trees. Community-run plantings have now resumed.	Noted	Add text under section Woodland Habitat Action Plan, Current status as follows: Community action Local groups in the Lower Lea Valley are undertaking on-going woodland creation and enhancement works on areas on and around Hackney Marshes. This has included planting along the edges of the existing mixed deciduous woodland and work to improve the habitat quality of these areas through active management including rotational coppicing.
				Black poplars are present, especially by the old Lea on the east side of the main marsh. They are a mixture of full natives and hybrids and we believe this is one of the best sites for the native black poplar in inner London. They are some of the oldest trees on the marsh and are now starting to collapse, and LBH is obliged to cut back risky branches. Anticipating this, we began planting replacements in 2002. The Community Tree Nursery specialises in raising native black poplars and some of its products have been planted elsewhere in the LVRP.	Noted - the presence of Black Poplar is noted in the BAP. It would be useful to produce an inventory of their status in the valley.	Produce Black Poplar inventory through the Woodland HAP
				South of the main marsh is Wick Woodland, planted 20-25 years ago on former football pitches at Wick Field. This is now (to the eye) a fully grown wood, though lacking veteran trees. Community volunteers manage it in consultation with LB Hackney. For several years now HMUG and the Tree Musketeers have organised winter coppicing and veteranising work sessions, keeping an open structure, and creating standing dead wood and dead hedges for habitat. We now have the hazel areas in coppicing cycle. We also clear bramble and self-seeded ash, and crown-raise to develop the canopy. Many local people have been engaged and educated in the importance and possibilities of urban woods.	Noted	Add text under section Woodland Habitat Action Plan, Current status as follows: Community action Local groups in the Lower Lea Valley are undertaking on-going woodland creation and enhancement works on areas on and around Hackney Marshes. This has included planting along the edges of the existing mixed deciduous woodland and work to improve the habitat quality of these areas through active management including rotational coppicing.

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Hackney Marshes User Group		Built and Brownfield		Brownfield areas of the marshes were lost to the Olympics development. However, we have managed to establish a small new mosaic site on east marsh. Part of the Olympics transport mall surface had been left in situ without planning permission as a putative car park. HMUG and the group Save Lea Marshes succeeded in persuading a common land inquiry against this in 2015, and then argued successfully for conversion to mosaic rather than football pitches. This was done in 2016-17 and we await the results with interest. We believe there is an area of Pulverised Fuel Ash (PFA) on the north marsh, deposited by the former Millfields power station. It was planted experimentally with oaks, which have remained stunted.	Noted	Amend Built Environment and Brownfield, current status section as follows: The remaining PFA areas, totalling around 12Ha in area are at Amwell Nature Reserve, Cheshunt gravel pits, Sewardstone Marsh and Rye House Power Station (although the latter site is just outside the Park boundary). There is also thought to be an area of PFA deposited from Millfields Power Station on Hackney North Marsh. Add text under section Built Environment and Brownfield, current status section as follows: Post 2012 a small new brownfield mosaic site on Hackney East Marsh was established from the remains of an Olympic transport hub.
		Kingfisher		We note that kingfishers aren't using the artificial banks at the Waterworks and QE2 Park. Kingfishers have been observed on the old Lea by the marsh regularly for, I believe, the past 30 years. I suspect they use the steep banks by the former putting course on the Leyton side.	Noted, further information on key nesting sites is required and will be undertaken through the Kingfisher Species Action Plan	Set targets under the Kingfisher Species Action plan to undertake a survey of nesting locations within the Lea Valley.
		Bats		Bats are present on the marsh, in the Middlesex Filter Beds reserve and on Walthamstow marsh. Some years ago our sister organisation Millfields Users Group persuaded LB Hackney to remodel the lights at the Millfields waste station. We suspect that lighting at Essex Wharf, the Lea Bridge Road, and the Princess of Wales pub may be an issue.	Noted further information on the use of the Lee Valley by bats is needed and will be undertaken through the Bat Species Action Plan	Set targets under Bat Species Action Plan to undertake a survey of bat species in the Regional Park
				Pesticides on sports fields Hackney marshes hosts a huge number of football pitches and we know that insecticides are applied as the conventional control method for leatherjackets. The mown grassland of the pitch areas contains clover and other flowering plants which attract pollinators, and no attention has been given, as far as we know, to the possible effects on pollinating insects. There are also honeybee hives within foraging distance but we regard this as an agricultural issue rather than one of biodiversity: it is the wild invertebrate population that is of interest. The introduction of cricket to the marsh leads us to ask whether other pesticides will be applied as part of the maintenance of the cricket wickets. We would like to see the LVRP develop a policy of discouraging pesticide use for this purpose, and an exploration of sustainable methods.	Sustainable methods could be researched and discussed with partners.	Look at through the Grassland and Fen SAP
				Planning role At page 43 you note the need for 'a robust planning response' to threats. In our view the LVRPA has often failed. Essex Wharf and the Waterworks are cases in point. We were disappointed that the Authority took no part in the common land inquiry about marshes developments in 2015.	The Authority provided a robust response to development proposals for Essex Wharf objecting to the scheme on 3 occasions and seeking leave to appeal the decision to grant planning permission. It only withdrew Court Action following a qualified view of the Judge which cast doubt on the merits of its case. In line with Government advice the Authority now takes a pragmatic view on land identified as PDL and won't object in principle to development on areas of formerly developed land designated as MOL or green belt.	No Change
				Community engagement I hope you will note that local community has engaged strongly with biodiversity in this area of the LVRP, and that this has emerged from the grassroots as much as from being catalysed by the authorities. LB Hackney, for example, lacks a Biodiversity Officer and very sensibly calls on expertise in the voluntary sector, from LWT to the Tree Musketeers .	The engagement of community groups is noted and welcomed. The BAP hopes to engage further with local groups and will look at ways to formalise this engagement.	No Change
				Additional species data provided	Noted and welcomed	No Change
Greenspace Information for Greater London	7 to 7			Are there any additional hooks in the draft London Environment Strategy, the government's 25-year environment plan, or the National Park City initiative for the London section of the Park?	Agreed	Add text under section Biodiversity Action - a national response as follows: The most recent environment plan 'A Green Future: Our 25 Year Plan to Improve the Environment' sets out government action in England to help the natural world regain and retain health through the achievement of a set of 25–year goals which are: • Clean air • Clean and plentiful water • Thriving plants and wildlife • Reduced risk of harm from environmental hazards such as flooding and drought • Using resources from nature more sustainably and efficiently • Enhanced beauty, heritage and engagement with the natural environment In addition, they aim to manage pressures on the environment by: • Mitigating and adapting to climate change • Minimising waste • Managing exposure to chemicals • Enhancing biosecurity It is intended that this plan will be revised and refreshed during its lifespan in order to take account of fast-moving changes in science, technology and our society.
	15			The Association of Local Environmental Records Centres (ALERC) has tweaked our generic term to 'local environmental records centre (LERC). The ALERC definition in case it's of use is: Local Environmental Records Centres (LERCs) are not-for-profit organisations that collect, collate and manage information on the natural environment for a defined geographic area. LERCs support and collaborate with a network of experts to ensure information is robust, and make information products and services accessible to a range of audiences including decision-makers, the public, and researchers. It might be worth listing the LERCs you're working with here?	Noted	Amend text under section species review as follows: A review of data from the LERC's ~~Local Records Centres~~; Greenspace Information for Greater London, Hertfordshire Environmental Records Centre, Essex Wildlife Trust Environmental Records Centre and Essex Field Club carried out on behalf of the Authority by Hertfordshire Environmental Records Centre shows that in total over 4700 species have been recorded in Lee Valley Park.
	22			GiGL aims to review the species of conservation of concern list with key partners as soon as we can find additional funding to cover the experts' time.	Noted and welcomed	No Change

Organisation	Page Number	Section Title	Current text	Comments	Response	Action
	24			Would it be useful to reference London Invasive Species Initiative and their species of concern list (GiGL provides species data using the list as a filter)	Agreed	Add text under section New Species Action Plans - INNS as follows: To date no full survey of INNS has been undertaken in the valley although there has been some robust management undertaken to deal with certain key identified species. A list of INNS of concern in London has been produced by the London Invasive Species Initiative and managed by GIGL (Greenspace Information for Greater London).
	25			Biodiversity resource section. Is it worth referencing the fact the Park is a partner in the relevant local environmental records centres here? You share data to ensure the Park is well represented in LERC services and gain access to data from all other LERC stakeholders too.	Agreed	Add text under section Species Review as follows: Lee Valley Regional Park holds data agreements with the relevant Local Environmental Records Centres (LERC).
		Action Plans		Current action sections. As above, your partnership working with the LERCs may be relevant to each plan too? For instance, by sharing species and habitat data via GiGL your data inform regional and national research by the many students and researchers we work with, as well as relevant organisations such as the Environment Agency and other site managers working in the Park. They will also ensure that a clear picture of the Park is included in any data search reports provided to inform adjacent planning applications.	Agreed	Ensure that data sharing is noted within the SMART targets.
				Please let me know if we can be of further assistance with data analysis for the BAP e.g. areas of deficiency or habitat suitability mapping.	Noted and welcomed	No Change
Waltham Abbey Royal Gunpowder Mills				We view the Lee Valley Park as a green oasis in an ever developing urban environment. Whilst the Royal Gunpowder Mills is sited within the Park, it has evolved separately from its surrounding area over a period of 350 years, as a consequence of its industry of explosives and propellant manufacture and research. It had its own alder plantation for charcoal-making, a network of canals, earthworks and buildings of diverse construction materials. There are waterways still, although many canals are now dry. Many buildings became derelict over time, so creating wildlife niches and variety of habitats. We see the Royal Gunpowder Mills as a unique and biodiverse 'oasis' within the greater 'oasis' of the Lee Valley Regional Park. The key question then is how can the Mills, with its unique set of features (natural and manmade) support the bigger plan? How can we contribute and how can others in the bigger 'oasis' contribute to the site we manage? We, the 'Company', think it is important to start by setting out our vision of the future of the site, which envisages sustainable income through commercial letting, specifically a Heritage Business Park sited in the former WW1 Cordite Factory, a Science Centre for interpretation, and further development of buildings for interpretation of the site for letting, education, and mixed use. The visitor attraction would extend its interpretation, exhibitions and education for schools and for leisure. We hope to be able to develop our proposals with the 'Foundation '. We are keen to conserve the natural heritage of the site alongside conservation of the important built heritage. We note the emphasis of the ecological value of post-industrial habitats in your plan (p.15).	Noted	No Change
	23	Priority Habitats - Built environment		The Royal Gunpowder Mills is considered to be 'the most important site for the history of explosives in Europe', is an anchor point on the European Route for Industrial Heritage, and the majority of its 175 acres is designated a Scheduled Monument. After closing as a working establishment in 1991 the southern part of its site was decontaminated and became a visitor attraction. There are about 200 manmade structures on the site composed of earth, brick, cements, concretes and metals spread within the SSSI and SAM. When buildings were made redundant by changes in processes and/or implementation of new technology, they were left in situ and reused for other purposes rather than be demolished. Many since became derelict, so creating a variety of wildlife habitats. We have mentioned need for development. We would anticipate a future plan in which some buildings would be brought back into reuse, some buildings conserved, and other buildings and structures in 'managed decay'. We believe that post-industrial habitat such as the Royal Gunpowder Mills, already a visitor attraction, is perfectly positioned for the objective (p9) of access to nature for more people. We believe that the opportunity is augmented by the recent emergence of the Lee Valley Heritage Alliance, which is connecting up historic sites along the whole length of the Lee Valley, the place of many important industries and technological advances. The commitment of the Alliance to increase the number of recognised important sites for industry, therefore supporters and visitors, should help such sites to survive with their existing wildlife habitats or opportunities to become habitats, to be explored and enjoyed by people for both their history and nature, rather than be lost to development pressures. Industry has left a legacy of contamination at the Royal Gunpowder Mills. Only part of the southern end of the site was decontaminated - a 'free to roam' area which has restricted movement of the public on site ever since, except by land-train and guided walks. As a result, much of its area has probably lain largely undisturbed since WW2 apart from very specific woodland and conservation management. As a result of its long and rich industrial past and its isolation, what the Royal Gunpowder Mills offers in terms of habitat is very different to surrounding areas, bringing diversity of experience to people exploring the area. There are also indicators that there is interest by operators of ecotourism or lodges on land that lies outside of both the Scheduled Monument and SSSI. We consider that raised walkways may protect habitats whilst giving access across contaminated land to access built heritage and offer wildlife viewing opportunities to visitors. This awaits investigation. The feasibility of bridges across Horsemill Stream - long talked about, to create a cross-boundary, west to east route linking Waltham Cross via the White Water Centre to Waltham Abbey	Noted	No Change
		Rivers and streams		The Royal Gunpowder Mills lies on the edge of the Herts-Essex boundary, flanked by Horsemill Stream to the West, Cornmill Stream to the East, and with the Old River Lee winding southwards from Fishers Green through the Royal Gunpowder Mills and onwards to Cornmill Meadows. It has ditches, ponds, marshy areas and an extensive network of canals built to transport goods by water through the site (now mostly dry). The River Lee is stated in your plan as having the greatest diversity of features, therefore the widest variety of plants and animals. We note your concern (p13) to treat the River Lee and its channels as a single ecological unit and not isolate any stretches. We will be pleased to explore this approach with you.	Noted and welcomed	Contact WARGM to arrange meeting
		Woodland		We need to update you regarding SSSI invasive sycamore (p39). Since 2014, guided by a woodland management plan, a phased restoration of the former alder plantation was begun through felling of sycamore of which a significant amount has been removed, and the coppicing and new planting of alder is underway. We intend to continue this work as funds allow. In tandem, a deer management plan has been in operation to reduce the herd of wild deer on site.	Noted	Amend text under section Woodland HAP - current status as follows: The woodland in the Royal Gunpowder Mills at Waltham Abbey was originally planned to provide wood for the production of charcoal for gunpowder, this SSSI is currently in unfavourable condition~~. and with~~ The Sycamore ~~now~~ which had ~~outcompeting~~ outcompeted the Alder and ~~dominating~~ dominated the sapling, shrub and canopy layer has started to be managed. Also add text under section Current action as follows: At Waltham Abbey Royal Gunpowder Mills work commenced in 2014 on the restoration of the Alder plantations by the felling of Sycamore and the coppicing and planting of Alder. There is also a Deer Management Plan in place to reduce the impact of the wild deer herd on site.
				Rewetting of the Royal Gunpowder Mills: A river enhancement project that is mentioned in the Rivers and Streams action plan is the rewetting of canals and ditches of the Royal Gunpowder Mills. Research and surveying by the Environment Agency was in progress in 2016. We await the report. We see this project as an immense opportunity, not just for strengthening the SSSI, but for further interpretation of the site's industrial past, attracting people to the site.	Noted	No Change

Organisation	Page Number	Section Title	Current text	Comments	Response	Action
				Surveys: We are concerned that there is little that we can contribute by way of statistics and trends regarding the wildlife on site. As far as I know there has been no systematic or regular surveying (p.16) of species at the Royal Gunpowder Mills over time, apart from the monitoring of the decline of grey heron nesting. Otherwise we appear to hold only one-off surveys of wildlife, such as 2015/2016 surveys connected to the 'PGL planning application'. Fauna observed at Royal Gunpowder Mills by our grounds and conservation staff and volunteers include: Fallow Deer, Otter, Badger, Mole, various species of Shrew and Vole, Wood mice, Rabbit Stoat, Weasel, a range of bats species, Grass Snake, Slow Worm, Common Lizard, Great Crested Newt, Common Newt, Common Toad, Common Frog, Grey Heron, Buzzard, Hobby, Kestrel, Sparrow Hawk, breeding Barn Owls, breeding Tawney Owls, Little Owl, Kingfisher, Cuckoo, Siskin, Goldfinch and other finch species, Grey Wagtail, Pied Wagtail, Fieldfare, Song Thrush, Redwing, Great Spotted Woodpecker, Green Woodpecker, Reed Warbler, Spotted Flycatcher, and various Dragon Fly species, to name but a few. There is also a wide range of flora including patches of Bee Orchid and widespread nettle colonisation, which offers egg laying vegetation for insects – notably butterflies, such as the now rarely seen Peacock butterfly. We have teams of regular teams of volunteers for nature conservation and individuals in our large volunteer force who, if taught and supported by people with expertise might be deployed with good effect. We wonder if here is an opportunity for us to contribute to your data in return for LVRPA help. Alternatively your wildlife surveyors are very welcome to visit the Royal Gunpowder Mills at any time to collect data and talk with us. We would be very interested to discuss mutual benefit arising from such a scheme.	Noted and welcomed	Contact WARGM to arrange meeting
				Collaboration and consultation. At the top of this document, we set out how built and natural heritage at the Royal Gunpowder Mills is intertwined, i.e. the Royal Gunpowder Mills is today as much a wildlife reserve as it is a historical monument. We work closely with Natural England and Historic England on the management of the site, and are in discussion to establish a holistic management plan for the Scheduled Monument. Habitats in built heritage settings present ongoing challenges in management and strategic choices. We wish to note here that we believe that it is important that statutory stakeholders are involved to get the balance right, and it is also important to inform and achieve the backing of community. For the Royal Gunpowder Mills we need to reiterate that achieving sustainable income for conservation of its structures and the site's long-term health is paramount and development on site will need to take place. It is worth noting that wildlife colonised the Royal Gunpowder Mills even while it was a very busy working site. We believe that we can encourage many more visitors on site to explore, enjoy and engage with history and nature whilst maintaining the balance and increasing biodiversity. In this journey into the future, we would be wide open to joint ventures and collaborative working to achieve the objectives of your Biodiversity Action Plan, and ours of regenerating the Royal Gunpowder Mills.	Noted and welcomed	Include WARGM in the partnership discussions
Network Rail				1. We note that the first of your objectives is to restore a fully integrated floodplain corridor. Given that much of the Park's western boundary abuts the often raised Network Rail's (and proposed Crossrail 2) land, we acknowledge that this will require proactive management and liaison between both parties.	Noted	No Change
				2. We strongly support the commitment to developing SMART action plans for key species and habitats.	Support noted and welcomed	No Change
				3. We welcome the inclusion of invasive and non-native species action plans.	Support noted and welcomed	No Change
				4. Whilst not a principal objective of this document, there is a clear opportunity to improve the success of the BAP by identifying the common themes within each final SMART action plan and how they contribute to the overall BAP objectives. Without this additional step there is risk of investment improving individual species or habitats but not proactively targeting the landscape level objectives, e.g. restoring the integrated floodplain.	Noted	To be considered through the setting of SMART targets
				5. Whilst not a principal objective of this document, there is a clear opportunity to improve the success of the BAP by identifying the common themes between the final SMART action plans to help inform future planning and investment e.g. investment in expanding an area of open water may benefit five of the action plan habitats/species, but expanding an area of grassland only benefits four.	Noted	To be considered through the setting of SMART targets
				6. Whilst we understand the BAPs approach to target species and habitat (following the UK Biodiversity Group 1997 methodology), we note the absence of any reference to Natural Capital or Green Infrastructure. Whilst these developing methods do not directly relate to the species and habitat action plans, they have the potential to inform and significantly contribute to the overall BAP objectives. If not now then in several years. We would welcome and encourage their consideration as part of the next phase of implementation, if they are not already being considered.	The draft Strategic Policies in the Lee Valley Regional Park's Park Development Framework refer to natural capital. We would welcome any further discussions regarding implementation.	No Change
				7. It would be good to see the areas of the different habitat types and the protected sites. If possible to include some numerical targets for the habitats. The targets at the moment are somewhat generic. Targets will enable quantitative reporting and will prove beneficial when looking to leverage funding.	Mapping will be included in the final document and SMART targets drawn up for each Action Plan.	No Change
	6	The River Lea Catchment Partnership	The River Lea Catchment has six partnerships. The catchment hosts for the Lea Catchment are:	current (as of 2018) - as theoretically, these may change in future years	Agreed	Amend text under section The River Lea Catchment Partnership as follows: The catchment hosts at time of publication ~~for the Lea Catchment~~ are:
	17	Plants	The extent of certain communities is also noteworthy, the large swathes of Common Reed (Phragmites australis) provide important habitat for key species and grassland species such as Black Knapweed (Centaurea nigra), Yarrow (Achillea millefolium) and Wild Carrot (Daucus carota subsp. Carota) all provide a long-lasting nectar source for invertebrates.	to create reedbed habitat which is classed as a priority species under section 41 of the NERC Act 2006	The action to create priority reedbed habitat will be outlined in the Grassland and Fen HAP SMART targets	Have target to create reedbed habitat as a part of the Grassland and Fen HAP SMART targets
	21	INNS	The grasslands have historically had stands of Japanese Knotweed (Fallopia japonica) of varying sizes although on-going management has seen many of these eradicated. A more recent and perhaps more widespread coloniser is Goats Rue (Galega officinalis) which poses a significant problem on grasslands where it readily colonises bare soil impacting native species as well as general habitat quality.	but JKW is still present along some of the waterways?	Agreed	Add text under section INNS as follows: The grasslands have historically had stands of Japanese Knotweed (Fallopia japonica) of varying sizes although on-going management has seen many of these eradicated although there are still large stands along the various waterways.

Organisation	Page Number	Section Title	Current text	Comments	Response	Action
	26	Rivers and streams HAP - Intro	Rivers in their natural state are dynamic systems capable of carrying varying volumes of water and changing course over time as banks erode and sediment is removed or deposited, much of this dynamism has been lost from the River Lea with the construction of the Flood Relief Scheme.	new sentence	Agreed	Amend text under section Rivers and Streams Habitat Action Plan, Introduction to: Rivers in their natural state are dynamic systems capable of carrying varying volumes of water and changing course over time as banks erode and sediment is removed, shifted or deposited. ~~, much~~ Much of this dynamism has been lost from the River Lea with the construction of the Flood Relief Scheme.
			Marsh, wet grassland and wet woodland all depend on this connectivity between the river and its floodplain.	they can be fed by GW	Agreed - this section is illustrating the close links between the river, floodplain and habitats although the text should be amended to show it is not the sole factor	Amend text under section Rivers and Streams as follows: Marsh, wet grassland and wet woodland can all be affected ~~depend on this~~ by the connectivity between the river and its floodplain.
		Rivers and streams HAP - current status	Variations in the depth and flow rates caused by features such as gravel riffles provide habitat for spawning fish, notably Barbel and invertebrates such as the Banded Demoiselle.	Check sentence structure	Structure considered OK	No Change
			Eroding banks provide suitable nesting sites for Kingfisher and Sand Martin, whilst still backwaters provide habitat for fish and a wide range of other wildlife including suitable sites for Otter holts.	and WV burrows	Agreed	Add and amend text under section Rivers and Streams HAP - Current status as follows: Water Voles utilise river banks for their burrows; ~~Eroding~~ exposed banks provide suitable nesting sites for Kingfisher and Sand Martin, whilst still backwaters provide habitat for fish and a wide range of other wildlife including suitable sites for Otter holts.
	27		This has been recognised at a European level by the Water Framework Directive a piece of legislation that became law in 2003 that states that all UK waterbodies must be in 'good ecological status' by 2027.	or good ecological potential (if they are heavily modified catchments)	Agreed	Add and amend text under section Rivers and Streams HAP - Current status as follows: Although it is thought that many rivers have improved in quality over the past few decades, there are still current issues that need to be overcome. This has been recognised at a European level by the Water Framework Directive a piece of legislation that became law in 2003 that states that all UK waterbodies must be in 'good ecological status' or 'good ecological potential' on heavily modified catchments by 2027.
		water quality	The water chemistry of the River Lea and some of its tributaries is heavily influenced by the discharge of treated sewage effluent. Diffuse pollution from agricultural, industrial and domestic activities will also have an adverse effect on water chemistry. The issue of low flows is not entirely separate from that of water quality as pollutants are more concentrated when there is less water flowing through the channel.	Also a number of misconnections and CSOs (combined sewer overflows) throughout the wider Lee catchment.	Agreed	Add text under section water quality as follows: Diffuse pollution from agricultural, industrial and domestic activities will also have an adverse effect on water chemistry as do misconnections and combined sewer overflows throughout the wider Lea Catchment.
		Flood erosion and control	In a natural river floodplain a mosaic of wetland habitats characterised by species that are tolerant of periodic inundation would exist. The impoundment of rivers and effective control of flood waters means that most of this transitional habitat no longer exists. In many cases there is a complete absence of a natural wetland margin and stands of large trees have become established right up to the river bank. In addition, the processes of erosion and deposition that act to form important natural riparian habitats no longer occur due to modifications to river banks which cut the river off from its natural floodplain because of the risk they pose to adjacent landowners.	due to modifications to river banks which cut the river off from its natural floodplain.	Agreed	Add and amend text under section Rivers and Streams HAP - Flood and erosion control as follows: In many cases there is a complete absence of a natural wetland margin and stands of large trees have become established right up to the river bank. In addition, the processes of erosion and deposition that act to form important natural riparian habitats no longer occur due to modifications to river banks which cut the river off from its natural floodplain because of ~~to~~ the risk they pose to adjacent landowners.
		Non-native invasive species	The Signal Crayfish is widespread throughout the river catchment and causes extensive damage to aquatic vegetation, undermining riverbanks and predating fish eggs.	is it just the signal crayfish, or is it all of the non native crayfish species?	The text notes that all non-native crayfish have an impact but that the threat of the Signal Crayfish is of particular note due to its widespread distribution in the Lee Valley.	No Change
		Non-native invasive species	The Signal Crayfish is widespread throughout the river catchment and causes extensive damage to aquatic vegetation, undermining riverbanks and predating fish eggs.	They also disturb sediment in the river which could smother fish spawning habitat.	Agreed	Add text under section Rivers and Streams HAP - Non-native invasive species as follows: The Signal Crayfish is widespread throughout the river catchment and causes extensive damage to aquatic vegetation, undermining riverbanks, increasing turbidity and predating fish eggs.
		Inappropriate development	The best of these can actually deliver benefits to biodiversity where they attempt to address the hard engineering works of the past	and restore the environment to a more natural state	Agreed	Add text under section Rivers and Streams HAP - Inappropriate development as follows: Riverside development continues to have a major impact on rivers and streams in and around the Regional Park. The best of these can actually deliver benefits to biodiversity where they attempt to address the hard engineering works of the past and restore the environment to a more natural state.
				Is there scope to add something in this section along the lines of: Development alongside watercourses should aim to renaturalise hard engineered banks, and provide a minimum of an 8m buffer of native vegetation along the watercourse to provide a corridor for wildlife. Can you refer to policies in relevant local plans?	Noted however this probably best fits in the SMART targets	Include in the Rivers and Streams HAP SMART targets

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	28	Current Action - River Catchment Partnerships	There are a number of river enhancement projects proposed through the Catchment Management Plan such as the installation of Eel passes on Holyfield Weir, installation of floating reedbeds in the Lower Lea and the re-wetting of existing channels in the Waltham Abbey Royal Gunpowder Mills.	There are a large number of actions / measures identified under the Water Framework Directive which are included within the RBMP. Implementation of these actions / measures will help move the watercourse towards good ecological status / potential.	Agreed	Add text under section Rivers and Streams HAP - River Catchment Partnerships as follows: Working at the catchment level, this partnership is a group that works with key stakeholders to agree and deliver the strategic priorities for the catchment and to support the Environment Agency in developing an appropriate River Basin Management Plan, required under the Water Framework Directive. These actions will help move the watercourse towards good ecological status or potential.
			re-wetting of existing channels in the Waltham Abbey Royal Gunpowder Mills.	Whether this will go ahead or not is another question, as the costing estimates are very expensive. There is also the barbel habitat enhancement project at Fishers Green and there may be others in the pipeline.	Noted, it will remain in the text as an aspiration if funds allow	No Change
		Habitat management	This includes installation of floating reedbeds in urban stretches of the river such as at Lee Park Way, Essex Wharf and Tottenham	Does this count as management	Amend text for clarity	Add text under section Rivers and Stream HAP - Habitat Management as follows: Habitat enhancement and management
	29	monitoring	Certain key stretches of river including the Old River Lea at Cornmill Meadows and Fishers Green have annual electrofishing carried out by the Environment Agency.	There is also routine water quality monitoring (chemistry) in many of the lake / reservoir and river waterbodies by the Environment Agency. See below: ASH AT EASNEYE STORT AT ROYDON LEE AT DOBBS WEIR NAZEING BROOK AT NAZEING RD NORTH METROPOLITAN PIT :CHESHUNT TURNERSHILL MARSH :FISHERS GREEN SEVENTY ACRES LAKE :FISHERS GREEN BOWYERS WATER :WALTHAM CROSS LEE NAVIGATION SUBSIDARY B ABOVE ENFIELD LOCK TURKEY BROOK ABOVE SMALL RIVER LEE LEE AT LEA VALLEY RD (FOR CHINGFORD INTAKE) LEE NAVIGATION SUBSIDIARY B ABOVE PICKETTS LOCK CHING BROOK ABOVE LEE PYMMES BROOK R.H. CHANNEL AT FERRY LANE LOW MAYNARD RESERVOIR :WALTHAMSTOW LEE ABOVE LEA BRIDGE WEIR HIGH MAYNARD LOCKWOOD RESERVOIR KING GEORGE SOUTH OUTLET WILLIAM GIRLING OUTLET WALTHAMSTOW NO. 5 OUTLET WARWICK WEST OUTLET	Noted	Add text under Rivers and Stream HAP - monitoring as follows: There is also routine water quality monitoring undertaken by the Environment Agency in a number of the waterbodies and lakes of the Regional Park.
		INNS	There are currently a number of established schemes to manage non-native invasive species these include the Hertfordshire Water Vole and Non-native Species Project with a funded post	species. These	Agreed	Amend text under section Rivers and Stream HAP - Non-native Invasive Species as follows: There are currently a number of established schemes to manage non-native invasive species. ~~t~~These include the Hertfordshire Water Vole and Non-native Species Project with a funded post to co-ordinate effort across Hertfordshire and linking in to Mink management across the Regional Park.
		Rivers and stream Action plan aim	To conserve and enhance the ecological value of rivers and streams in the Lee Valley, through sympathetic and appropriate management.	also restoration and enhancement?	Agreed	Add text under section rivers and Stream HAP - Action Plan Aim as follows: To conserve, restore and enhance the ecological value of rivers and streams in the Lee Valley, through sympathetic and appropriate management.
	32	Standing Open Water Pollution	The reduction in levels on reservoirs can provide excellent marginal habitats for wading birds however reduction in open water can have a clear detrimental impact on wildfowl.	and drawdown for operational reasons	Agreed - The text was referring to operational reasons but text will amend for clarity	Add text to section Standing Open Water HAP - Operational Management issues of commercial sites as follows: Many of the open water sites, including those with a statutory designation are managed as a part of the water supply industry. The operational need to undertake management can impact, both negatively and positively on the habitats present. The reduction in levels on reservoirs for operational reasons can provide excellent marginal habitats for wading birds however reduction in open water can have a clear detrimental impact on wildfowl.
				Also requirement for banks that can be inspected means that often it is not an option to have marginal vegetation around some drinking water reservoirs.	Agreed	Add text under section Standing Open Water HAP - Operational management issues of commercial sites as follows: Many of the open water sites, including those with a statutory designation are managed as a part of the water supply industry. The operational need to undertake management can impact, both negatively and positively on the habitats present. For example requirements to undertake routine checks of reservoir banks can mean that marginal vegetation is kept to a minimum.
		monitoring		The Environment Agency also carry out routine water quality monitoring at XXXXX	Agreed	Add text under section Standing Open Water HAP - monitoring as follows: The wetland bird numbers are monitored regularly via the BTO's Wetland Bird Survey (WeBS). Electrofishing takes place biannually on many of the lakes including Amwell Nature Reserve, Stanstead Innings and the lakes within River Lee Country Park. The Environment Agency also undertake routine water quality monitoring at various open water locations along the Lee Catchment.

Organisation	Page Number	Section Title	Current text	Comments	Response	Action
Environment Agency	33	Habitat enhancement schemes	Management is on-going at many open water sites; however larger scale development work also takes place if funds permit. Schemes of particular note include the enhancement works on Seventy Acres lakes funded through the EU Life Bid in 2002-02, development of Walthamstow Wetlands, which includes habitat and visitor enhancements funded through the Heritage lottery Fund and habitat creation works at Glen Faba enabled through S106 planning funds commenced in 2017.	check date on Seventy Acres?	Typo Noted	Amend text under section Standing Open Water HAP - Habitat enhancement schemes as follows: Schemes of particular note include the enhancement works on Seventy Acres lakes funded through the EU Life Bid in 2002-~~02~~ 03, development of Walthamstow Wetlands, which includes habitat and visitor enhancements funded through the Heritage lottery Fund and habitat creation works at Glen Faba enabled through S106 planning funds commenced in 2017.
				now completed (WW)	Agreed	Add text under section Standing Open Water HAP - Habitat enhancement schemes as follows: Schemes of particular note include the enhancement works on Seventy Acres lakes funded through the EU Life Bid in 2002-02 03, development of Walthamstow Wetlands opened in 2017, which includes habitat and visitor enhancements funded through the Heritage lottery Fund and habitat creation works at Glen Faba enabled through S106 planning funds commenced in 2017.
	34	Grassland and Fen HAP	Wet grasslands are found where groundwater levels are close to, but not permanently at, the surface and are affected by shallow seasonal flooding. Although there may be considerable overlap with fen meadows, wet grasslands tend to be floristically poorer, having a greater history of human intervention.	does this not depend on the type of grassland and NVC community?	Noted	Amend text under section Grassland and Fen Habitat Action Plan Introduction as follows: Wet grasslands are found where groundwater levels are close to, but not permanently at, the surface and are affected by shallow seasonal flooding. Although there may be considerable overlap with fen meadows, wet grasslands ~~tend to~~ can be floristically poorer, having a greater history of human intervention.
			In 2008 it was estimated that there are about 5000ha of reedbed in the UK, and whilst there has been a co-ordinated and concerted conservation effort on reedbed habitat it is unlikely that this has increased to anywhere near its former range. The current areas of reedbed are also fragmented with only about 50 reedbeds greater than 20ha in size14	what was it's former range?	It is difficult to quantify this at any particular point therefore it will need to be sufficient to say that quantity has declined.	No Change
	35	Current status	the endangered Water Vole (Arvicola amphibius)	change endangered to protected	Agreed	Amend text under section Grassland and Fen Habitat Action Plan - current status as follows: The resulting network of ditches which are separate from the main water course provides huge benefits to numerous wildlife including the ~~endangered~~ protected Water Vole (Arvicola amphibius).
	36	Low water levels	f these flood defence measures ever fail the result would be a sudden extreme inundation that can bring with it pollutants including untreated sewage effluent.	I doubt they are likely to fail - not sure this wording is appropriate. Perhaps something along the lines of "without the flood defences, the valley would be subject to widespread inundation"	Agreed	Amend text under section Grassland and Fen HAP - Low Water Levels as follows: The flood defence works of the past have contained flood waters within channels, preventing the natural inundation of low-lying grasslands that are essential in maintaining their character. Walthamstow Marshes is one example of a site that has suffered from low water levels in recent years. Without the flood defences the valley would be subject to widespread inundation ~~If these flood defence measures ever fail the result would be a sudden extreme inundation~~ that could ~~can~~ bring with it pollutants including untreated sewage effluent.
	37	Habitat creation schemes	Larger scale development work also takes place where funds permit. Schemes of particular note include the development of Walthamstow Wetlands which includes Heritage Lottery funded habitat and visitor enhancements delivered by a partnership of London Borough of Waltham Forest, Thames Water and London Wildlife Trust and habitat creation works planned for Glen Faba enabled through S106 planning funds.	was grassland or fen created as part of Walthamstow Wetlands?	Fen habitat has been created as a part of the scheme	No Change
		Action Plan Objectives	Through appropriate management enhance and restore existing grassland and fen habitats, improve habitat connectivity and seek opportunities for habitat creation.	Explore options to reconnect rivers with their floodplains	Agreed	Add text under Section Grassland and Fen Habitat Action Plan, Action Plan Objectives as follows: Through appropriate management enhance and restore existing grassland and fen habitats, improve habitat connectivity and seek opportunities for habitat creation, exploring options to reconnect rivers with their floodplains.
	38	woodland Action Plan - Current status	Wet or carr woodland is the most widespread woodland type throughout the Regional Park where the vast majority has become established around old gravel workings and through natural succession from reed swamp and fen. There is an inevitable conflict between retaining the early stages of vegetation succession and developing carr woodland as both have significant value for wildlife.	Wet woodland is classified as a priority habitat under S41 Nerc Act	Need to clarify in text that all the woodland types described are priority habitats	Amend text under section Woodland HAP - Introduction as follows: The woodland cover of the UK is sparse, with only 11.5% coverage . If natural succession were left to continue unhindered, colonisation by trees and shrubs would continue to the climax woodland habitat. A number of woodland types, outlined below are noted as Priority Habitats within the UK.
	39	Threats - inappropriate management	Low water levels Low water levels cause wet woodlands to dry out and prompt a change in the species composition, with species such as Sycamore (Acer pseudoplatanus) able to compete with the wetland specialists.	Can be exacerbated by climate change	Agreed	Amend text under section Woodland HAP - Threats, Low Water Levels as follows: Low water levels, which could be exacerbated by climate change, can cause wet woodlands to dry out and prompt a change in the species composition, with species such as Sycamore (Acer pseudoplatanus) able to compete with the wetland specialists.
	40	Invasive non-native and naturalised species	Oak Processionary Moth (Thaumetopoea processionea), found since 2014 at the Lee Valley VeloPark can have serious implications for oak (Quercus spp.).	There might be an update on its range in the valley - contact Forestry Commission.	Agreed	Add text under section Woodland HAP - Invasive non-native and naturalised species as follows: Oak Processionary Moth *(Thaumetopoea processionea)* , found since 2014 at the Lee Valley VeloPark and more recently at Middlesex Filter Beds can have serious implications for oak (Quercus spp.).
			The defoliation caused by the feeding caterpillars can leave the trees vulnerable to disease or attack, whilst they preferentially eat oak leaves they will move onto other trees once that food source is exhausted.	also a public health and safety issue as the hair on the OPM caterpillar cause rash and irritation	Noted however this is not a direct impact on the woodland habitat - this should be noted within the INNS SAP under current status.	Add text under section INNS Action Plan - Current status as follows: Oak Processionary Moth (Thaumetopoea processionea) was first reported at the Lee Valley Velopark in 2014 and is currently closely monitored and treated annually. The Oak Processionary Moth poses a risk to public health due to varying degrees of irritation caused by exposure to their hairs.

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		Current Action - habitat management	Areas of wet woodland require little management to maintain them in good habitat quality and therefore a minimal intervention approach is undertaken.	providing the ground is wet enough	Agreed	Add text under section Woodlands HAP as follows - Habitat management as follows: Providing there are suitable conditions ~~A~~areas of wet woodland require little management to maintain them in good habitat quality and therefore a minimal intervention approach is undertaken.
		Tree surveys	Regular surveys are undertaken on trees throughout LVRPA landholdings to monitor for tree health, associated public safety and disease. Any notifiable disease or pest is reported to the relevant organisation.	Forestry Commission monitoring?	There is no on-going Forestry Commission monitoring however they will undertake monitoring for OPM if required	No Change
	47	Bittern Species Action Plan - monitoring	Monthly roost watches are undertaken across the Park, in conjunction with key sites in Hertfordshire to monitor Bittern numbers. In the spring monitoring takes place to listen for any possible booming Bittern.	RSPB monitoring?	The monitoring is undertaken by a range of organisations including the RSPB, HMWT and LVRPA. It is felt that these do not need to be listed.	No Change
	49	Water Vole Species Action Plan Factors causing loss or decline - Deterioration of water quality and reduction of flow	Water Voles are relatively tolerant of low water quality but the full impacts of differing types of pollution such as biocides or build-up of plastics consumed are unknown. Low flows and droughts such as those caused by over-abstraction of groundwater can lead to the loss of Water Voles from the stretches of watercourses affected. By contrast, prolonged flooding can also be detrimental.	Separate water level fluctuation heading?	Agreed	Delete text under section Water Vole SAP - Factors causing loss or decline - Deterioration of Water quality as follows: Deterioration of water quality ~~and reduction of flow~~ Water Voles are relatively tolerant of low water quality but the full impacts of differing types of pollution such as biocides or build-up of plastics consumed are unknown. ~~Low flows and droughts such as those caused by over-abstraction of groundwater can lead to the loss of Water Voles from the stretches of watercourses affected. By contrast, prolonged flooding can also be detrimental.~~ Add text under section Water Vole SAP - Factors causing loss or decline as follows : Low flow Low flows and droughts such as those caused by over-abstraction of groundwater can lead to the loss of Water Voles from the stretches of watercourses affected. By contrast, prolonged flooding can also be detrimental.
	50	Habitat management		Also ties in with WFD actions which often look to restore natural banks, enhance marginal habitat and provide buffers to watercourses.	Agreed	Habitat Management Add text under section Water Vole SAP - current action, habitat management as follows: Key Water Vole sites are targeted for on-going management work to ensure the habitat is maintained in good condition. Much of this is achieved through targets set out in Higher Level Stewardship agreements and involves bankside scrub removal and in-channel vegetation management. This work also takes place on sites outside of stewardship but important for Water Voles and can help achieve targets of the Water Framework Directive such as restoration of natural banks, enhancement of marginal vegetation and the provision of buffers to watercourses. Work is also carried out to improve habitats between key populations to provide linkages.
	58	Creeping Marshwort - associated action plan		INNS?	Agreed	Add text under section Creeping Marshwort Species Action Plan - associated Action Plans as follows: • Grassland and fen • Invasive Non-native Species
	59	INNS - current status	The Zebra Mussel (Dreissena polymorpha) has been established for a long time in the Lee Valley but this has since 2014 been joined by the Quagga Mussel (Dreissena bugensis) which has recorded at both Chingford and Walthamstow Reservoirs. They both can form dense stands, altering 26 The Great Britain Invasive Non-native Species Strategy, DEFRA August 2015 Lee Valley Regional Park Biodiversity Action Plan 2018 – 2028 60 the freshwater ecosystem with the Quagga	can cause encrustation on hard surfaces and cause maintenance issues within reservoir waterbodies.	Agreed	Amend text under section INNS SAP - current status as follows: They both can form dense stands, altering the freshwater ecosystem with the Quagga Mussel being able to out-compete even the Zebra Mussel forming large encrusted masses on hard surfaces which can cause maintenance issues within reservoir waterbodies.
	60			No mention of Japanese Knotweed. Present in wider catchment and has potential to spread.	Japanese Knotweed is mentioned in the current status section but it is probably worth noting it widespread distribution in the south of the Regional Park in particular along the waterways.	Amend text under section INNS SAP - current status as follows: There are a number of invasive non-native plant species including Japanese Knotweed (Fallopia japonica), which has been well controlled using stem injection of herbicide on grassland areas but is still widespread along the waterways particularly in the south of the Regional Park and Giant Hogweed (Heracleum mantegazzianum) which can pose a risk to public health and is treated on land within the ownership of the Regional Park Authority.
	61			include additional legislation Additional legislation detailed at http://www.nonnativespecies.org/index.cfm?pageid=67	It is considered sufficient to note the main legislation	No Change
	61	localised introductions		Also movement of plant fragments by wildlife, e.g. birds	Agreed	Add text under section INNS SAP - Localised introductions as follows: Even with robust biosecurity measures there is still the possibility that species can enter the natural environment through localised introductions to sites. This is often the case for the introduction into waterways of unwanted pets such as goldfish (Carassius auratus), American Red-eared Terrapins (Trechemys scripta elegans) or snapper turtles and the movement of plant fragments by mobile species such as birds.
	62	Action Plan Objectives		is it worth including somewhere in this section about considering use of biological control methods as they become available?	Agreed	Add text under section INNS SAP - Action Plan Objectives as follows: Where possible use biological control methods in the management of INNS
	64	Otter SAP - Loss of habitat	Impoverished bankside features needed for breeding and resting, due to the continuing loss or degradation of wetland habitats, is likely to be a contributory factor.	Fragmentation?	Agreed	Amend text under section Otter SAP - loss of habitat as follows: Impoverished bankside features needed for breeding and resting, due to the continuing fragmentation, loss, or degradation of wetland habitats, is likely to be a contributory factor.

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	66	Bat SAP Loss and degradation of feeding habitats	Degradation of waterways, removal of trees (including standing and lying dead wood), loss of grazed pasture land all results in a reduction in the numbers and variety of insects available for hunting bats. The variety of species and the numbers of bats present in the valley will be dependent on the quality of the foraging habitat.	fragmentation or loss of connectivity between watercourses and adjacent wetlands, e.g. wet woodland for foraging and roosting	This is covered in section 'Fragmentation and isolation of habitats and populations'	No Change
	68	Barbel SAP - Current status	(INSERT – further detail being supplied by EA	The strongest populations of naturally recruiting Barbel in the Lea Catchment is in the Upper Lea between Batford and Hertford. Flow velocities over available spawning gravels and connectivity between Adult and Juvenile Barbel habitat is much more suitable than seen typically in the middle and Lower Lea. Barbel population distribution across the upper and lower lee is relatively consistent excluding the navigable sections where habitats are far less suitable. Their stock densities in the areas where they are present does vary depending on river morphology and once again available habitat. Environment Agency fish population surveys show a drastic decline in Barbel populations through the Kings Weir and Fishers Green reach of the River Lea. We believe this is due to a number of different contributing factors detailed below.	Agreed	Add text under section Barbel Species Action Plan - current status as follows: The strongest populations of naturally recruiting Barbel in the Lea Catchment are found in the Upper Lea between Batford and Hertford. This is probably attributed to the fact that flow velocities over available spawning gravels and connectivity between adult and juvenile Barbel habitat is much more suitable than seen typically in the middle and Lower Lea. Barbel population distribution across the Upper and Lower Lea is relatively consistent excluding the navigable sections where habitats are far less suitable. Their stock densities in the areas where they are present varies depending on river morphology and available habitat. Environment Agency fish population surveys show a drastic decline in Barbel populations through the Kings Weir and Fishers Green reach of the River Lea. This is considered to be due to a number of different contributing factors detailed below.
		Factors causing loss or decline INNS	Non-native invasive crayfish species, notably the Signal Crayfish (Pacifastacus leniusculus) can impact on the recruitment of Barbel through predation of eggs prior to spawning. There is also the potential for high concentrations of crayfish to increase the turbidity of the watercourse due to the disturbance of silt resulting from burrowing action and subsequent undermining of bank stability.	In addition increased turbidity and input of fine sediments compacts gravel and causing over lying silt on Barbel eggs impacting on the success rate of those fish making it to adults.	Agreed	Add text under section Barbel Species Action Plan - Non-native invasive species as follows: Non-native invasive crayfish species, notably the Signal Crayfish (Pacifastacus leniusculus) can impact on the recruitment of Barbel through predation of eggs prior to spawning. There is also the potential for high concentrations of crayfish to increase the turbidity of the watercourse due to the disturbance of silt resulting from burrowing action and subsequent undermining of bank stability. This increased turbidity and input of fine sediments compacts gravel and causes overlying silt on Barbel eggs, impacting on the success rate of those fish making it to adults.
		Low flow in rivers	Low flow in rivers can impact the spawning success of Barbel. The reduction in flow and associated reduction in oxygen levels can have a negative impact on the development of their eggs.	Lack of flow velocities over spawning gravels decreases sediment transportation and in turn impacts on the quality and success potential of those areas.	Agreed	Add text under section Barbel Species Action Plan - Low Flow as follows: Low flow in rivers can impact the spawning success of Barbel. The reduction in flow and associated reduction in oxygen levels can have a negative impact on the development of their eggs. Lack of flow velocities over spawning gravels also decreases sediment transportation which in turn impacts on the quality and success potential of those areas.
		Water Quality	High nitrate and phosphate cause the breakup and degeneration of floating reed-mats, and lead to anoxic sediments which do not support food or plant colonisation. Algal blooms can decrease feeding efficiency because of turbidity and direct fish kills.	Pollution incidents can lead to fish kills	Agreed	Add text under section Barbel Species Action Plan - Water quality as follows: High nitrate and phosphate cause the breakup and degeneration of floating reed-mats, and lead to anoxic sediments which do not support food or plant colonisation. Algal blooms can decrease feeding efficiency because of turbidity and direct fish kills. Pollution incidents can occur leading to fish mortality.
		In-channel enhancement schemes	A number of in-channel geomorphological enhancement schemes have been carried out in the Lee Valley.	Can't think of any in my time on the Lea that would specifically benefit Barbel. However now we have available funding we obviously have some great projects in the pipe line.	Agreed	Delete text under section Barbel Species Action Plan - In-channel habitat enhancement schemes as follows: ~~A number of in-channel geomorphological enhancement schemes have been carried out in the Lee Valley.~~
		monitoring	Monitoring of riverine fish populations is undertaken annually by the Environment Agency on the key Barbel site on the Old River lea at Fishers Green. The biological water quality is also monitored through riverfly monitoring carried out monthly at a number of locations in the valley.	We have also conducted an additional investigative fish pop survey in 2017 (countryfile) and we plan to conduct additional investigative fish pop surveys to look into recruitment as well as option pre and post fish pop data for any of the proposed river restoration schemes.	Noted	Add to text under section Barbel Species Action Plan - Monitoring as follows: Monitoring of riverine fish populations is undertaken annually by the Environment Agency on the key Barbel site on the Old River Lea at Fishers Green with an additional investigative fish population survey undertaken in 2017.
		Associated Action Plans		Include INNS	Agreed	Add text to Barbel Species Action Plan - Associated Action Plans as follows: Associated Action Plans • Rivers and streams • Invasive Non-native Species
	14	Grassland and fen	Floodplain grasslands and fen have experienced significant declines	0.5% of floodplain grassland remains.	This will be reviewed as an initial action in the Grassland and Fen HAP	Include review of remaining extent as baseline data Grassland and Fen HAP
	29	Rivers and Streams HAP	To conserve and enhance the ecological value of rivers and streams in the Lee Valley, through sympathetic and appropriate management	how can we measure this? To do so we will need to define good condition so that we can plan what we need to get there. We could identify indicators.	Agreed - this can be looked at through the development of the SMART targets	Look at measures of quality through the SMART targets
			Assess the quality of the existing river and stream habitat in the Lee Valley	As above, we will need to define how – RCS, WFD, MoRPH?	Agreed - this can be looked at through the development of the SMART targets	Look at measures of quality through the SMART targets

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Herts and Middlesex Wildlife Trust		Standing Open Water HAP	Watersports have been shown to alter the behaviour and distribution of waterfowl across the Park. There is clearly room for both recreational activity and biodiversity in the Lee Valley and measures such as leaving some waterbodies and banks free from disturbance as well as restrictions on activity at sensitive times of the year can help to ensure that biodiversity is protected.	The Wetland Assessment from 1993 proposed a classification of open water based on nature, recreation or integrated priority. May be worth referencing this. This could be reviewed.	Noted and agreed	Include as a SMART target in the Standing Open Water HAP
	32	Zonation of recreational use	The zonation of recreational activities currently enables a range of activities to sit alongside the ecological importance of waterbodies. This is managed through the creation of refuges on certain lakes such as Holyfield Lake where sailing is not allowed across the whole area, or by certain lakes having no recreational activity other than managed angling.	KGV – sailing on south basin only. Also see comment above re the Wetland Resource report	Noted and agreed	Add text under section Standing Open Water HAP - Zonation of recreational use as follows: This is managed through the creation of refuges on certain lakes such as Holyfield Lake where sailing is not allowed across the whole area, the restriction of sailing on King George V reservoir to the south basin or by certain lakes having no recreational activity other than managed angling.
				Insert:• Maintain the Lee Valley SPA/Ramsar site in favourable condition as defined by Natural England. Insert • Maintain all open water SSSIs in favourable condition as defined by Natural England.	Noted to be included in SMART targets	Address through SMART targets
			· Through appropriate management seek to enhance the standing open water habitat.	• Through appropriate management seek to enhance the existing standing open water habitat outside of the SPA and SSSIs.	All areas of standing open water should be managed to enhance the wider extent of habitat. Specific targets for non-SPA sites can be drawn up through the SMART targets.	Address through SMART targets
			· Seek to increase the extent of standing open water habitat in the Lee Valley through creation of ponds.	Not sure this is relevant now	Ponds are included in Standing Open Water and therefore there is still the aspiration to increase their extent	No Change
	37	Grassland and Fen Action Plan objectives	Assess the extent and quality of the existing grassland and fen in the Lee Valley	Change assess the extent to map the ….	Mapping of the areas will be a key element of the assessment	No Change
	41	Woodland HAP Action Plan aims	To conserve and enhance the ecological value of woodlands in the Lee Valley, through sympathetic and appropriate management.	– how should we measure the condition of the woods such that we know if they are getting better or worse?	Noted - monitoring methods to be addressed in the development of the SMART targets	Address through SMART targets
	41	Objectives	Assess the quality and extent of existing woodland habitat in the Lee Valley	How would this be measured?	Noted - monitoring methods to be addressed in the development of the SMART targets	Address through SMART targets
	41		Through appropriate management seek to enhance the existing woodland habitat.	Need to define the state to enable us to decide the appropriate management.	Agreed - to be addressed through the SMART targets	Address through SMART targets
	42	Urban HAP - Current status	Important old brick walls and buildings occur at Waltham Abbey and Broxbourne. While remains of industrial sites occur throughout the valley most are to be found in the more urbanised south. The railway network that runs the length of the valley provides an important brownfield habitat that also provides linkages between sites.	Not sure if there is a separate category of heritage features and buildings. I'm thinking of Royal Gunpowder Mills as well as Waltham Abbey,	These will all be included in the Built environment	No Change
	43	Threats		By its very nature these habitats are temporary as sites are cleared then re-developed. It is this dynamic use that provides the niches which many of the characteristic species need eg black redstarts. Left to natural succession, most habitats will succeed to scrub then woodland and some of those characteristic pioneer species will be lost.	Noted and agreed	No Change
		Lack of Management	Lack of management Left unmanaged the vegetation will mature, eventually seeing the loss of many of the important features that make this type of habitat so important. Where features such as nest boxes are installed on buildings on-going management such as clearing out old and failed nests can maintain them in good quality.	Need to think strategically such that such habitats are always represented somewhere acknowledging inevitable change drive by the economy.	Agreed	Address through SMART targets
	47	Bittern SAP - Objectives	Understand the current distribution and numbers of Bittern in the Lee Valley	Use map instead of understand current distribution	Mapping of the species will be key to the understanding of their distribution	No Change
		Objectives	Understand the current distribution of Water Voles in the Lee Valley	delete understand the and insert map the	Mapping of the species will be key to the understanding of their distribution	No Change
		Kingfisher SAP - Objectives	Understand the current distribution of Kingfishers in the Lee Valley	delete understand the and insert map the	Mapping of the species will be key to the understanding of their distribution	No Change
	58	Creeping Marshworth SAP	Monitor the presence of Creeping Marshwort and assess habitat suitability.	To confirm the presence of creeping marshwort and map its distribution.	Regular monitoring will confirm presence and map locations	No Change
			To maintain and enhance the Creeping Marshwort habitat at Walthamstow Marshes	· To maintain and expand the existing distribution of Creeping Marshwort.	Agreed	Add text under section Creeping Marshwort Species Action Plan Objectives as follows: To maintain and enhance the Creeping Marshwort habitat at Walthamstow Marshes to expand the current distribution.
				•Liaise with the managers of Port Meadow on how that site is managed.	Agreed - They will be invited to join the Creeping Marshwort Species Action Plan group	Managers of Port Meadow to be invited to join Creeping Marshwort SAP
	62	INNS Aim	To minimise introduction and spread of INNS in the Lee Valley	To control and prevent further spread of INNS in the Lee Valley.	Noted that it is important to include 'control'	Amend text in section INNS Aim as follows :Take action to control INNS in the Lee Valley to prevent further spread and reduce the risk of their introduction.
	62	INNS Objective	To understand the distribution of INNS across the Regional Park to enable an effective management strategy and dissemination of information with partners	Replace 'to understand' with 'to map'	Mapping of the species will be key to the understanding of their distribution	No Change

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London Borough of Hackney				There is no mention at all about the impact of light pollution or any effort to reduce it across the valley. As you know, most animal species including us are very sensitive to light and suffer when we do not have access to darkness. I would ask you to include a robust policy towards reducing light pollution within the park. Lee valley venues such as the Ice rink have powerful flood lights which light up large swatches of the valley. Other lighting is broad and undirected. Along watercourses, light is reflected and spreads over a large area. Hackney Council is working on policies to tackle light pollution from the edges of the borough over the Lee Valley. We are thinking about discussing the possibility of a darkness reserve and at least a coordinated strategy to planning applications and their lighting near to the valley. Take a look at this interesting article from Nature Journal. https://www.nature.com/articles/d41586-018-00665-7	The impact of lighting is mentioned within the Bat Species Action Plan. it would be very interesting to work with Local Authorities on this to pilot links in to dark corridors along the waterways.	Contact LB Hackney to discuss
Essex Bat Group	Page 1			Five objectives, but only four listed. Should these be the same five as page 5/6? - which include: 'To begin to achieve good ecological status of the River Lea and tributaries'.	Typo - these objectives are from the Lee Valley BAP (2000) and were still pertinent	Amend text under vision as follows: This vision will be met through four ~~five~~ key objectives:
	Page 6-7			Suggest Buglife's B-lines is added to list of Strategic landscape scale initiatives as this is likely to represent opportunities to create tangible benefits for invertebrate ecology and therefore assist bat conservation	Agreed	Add text under section Landscape Scale Conservation in the Lee Valley as follows: B-Lines The B-Lines initiative, led by Buglife aims to substantially increase the area or permanent wildflower-rich habitats in the UK, helping to support insect pollinators and other wildlife. The B-Lines are 3km wide linear pathways which encompass the best and most extensive areas of existing wildflower-rich habitat. The section of the Lee Valley from Ware to the Chingford Reservoirs forms part of an existing B-Line.
	Page 7		'SMART targets for each plan will be developed'	It would be interesting to determine if this is realistic for bats. Looking at the previous BAP with laudable, though rather generalised actions/targets, it will be seriously challenging to make them 'SMART'. 'Measurable' is often very difficult when assessing positive impacts on bats, as are 'Achievable' and 'Relevant'. The framing of actions and targets will need considerable care to ensure effective outcomes will be achieved. This is reflected by the lack of evidence that points to conservation strategies with clear benefits and unambiguous results e.g. effective conservation for bats is largely anecdotal and there are few scientifically conducted studies that demonstrate the value of conservation interventions - see Berthinussen, A. et al. (2014) Bat Conservation: Global evidence for the effects of interventions. Synopses of Conservation Evidence, Volume 5. Exeter).	Noted - it is hoped that engagement with key stakeholders will make the process as effective as possible.	Work with Local Bat groups to ensure the Action Plans are as effective as possible
	Page 9	Key Objective	ensure they are resilient to climate change'	is this an achievable objective?	This is an adopted aim from the Lee Valley Regional Park Plan.	No Change
	Page 20	Mammals		The distribution of bat populations and their use of the Regional Park is not well understood. Bats reliance upon habitat features within the boundary of the Park and their movements in to and out of the Park is also not well known. As far as we are aware, aside from a very few local surveys, there have been no recent comprehensive Park-wide surveys. As a result, it would be difficult to determine with any certainty areas of intense habitat utilisation (commuting routes, foraging areas and roosting sites). Identifying important areas is therefore largely a matter of conjecture based upon rather generalised assumptions e.g. 'bats are found in wetlands because that is where there are higher concentrations of insects: The Park has extensive wetlands, all of which are therefore likely to be important for bats. Ergo, the Park is likely to have significant bat populations attracted to the wetland environments in preference to other habitats'. This may not be an unreasonable assumption. However, it is based upon evidence which often relates to sites outside of the Park and is not based upon direct observation and has not been specifically validated. In addition, we know next to nothing regarding population dynamics for the individual species that rely upon the Park. Without this knowledge it is very difficult to develop any Action Plan that can meaningfully contribute to bat conservation. Taking the example of Daubenton's bat (Myotis daubentonii), it would be assumed on account of its ecology that this species is characteristic of much of the Park and would be widespread and relatively abundant. However, this is based on supposition and within the context of the Regional Park we have very little survey data for this species. Its breeding roosts have not been identified and it is largely unknown from winter hibernacula counts along the valley. National waterways surveys suggest that populations are stable (http://www.bats.org.uk/pages/-daubentons_bat-815.html). However, we know that the species is negatively impacted by lighting (Bats and Lighting - Interim Guidance Note: http://www.bats.org.uk/pages/bats_and_lighting.html) and much of the waterways within the Lee Valley are subject to increasing development and potentially greater light pollution. We also do not know if increases in angling related activity have any impact on this species (i.e. directly through discarded line for example or indirectly through artificially high fish populations impacting invertebrate numbers).	Noted - it is anticipated that surveys will be undertaken in the early stages of the Species Action Plan delivery	Surveys to be a SMART target in the Species Action Plan
	Page 21			1. Review of species and habitats and 2. Evaluation and prioritisation, this remains an outstanding and essential stage in working towards protecting and enhancing bat conservation. It is essential to better understand the ecology, population and distribution of the species that you wish to conserve and whose populations you wish to enhance and whose habitats you wish to protect. As this knowledge is lacking, we would like to see implementation of a revised BAP be supported by the development of a comprehensive initiative to understand the interactions between bats and the local environment. This would have to take the form of a commitment to monitoring and mapping and there are already initiatives such as the UCL's 'Nature-Smart Cities - Urban bat life', which demonstrate how this may be approached.	Agreed - more information is required and is a planned output of the project.	To be looked at through the SMART targets of the Species Action Plan
	Page 22		The species review highlighted the difficulty in effectively evaluating any temporal changes in spatial distribution or rarity; however this piece of work should provide a baseline upon which further studies can be undertaken in the future. Actions for species monitoring will be taken forward through the individual Action Plans'.	As stated before, Essex Bat Group would agree that a systematic review of abundance, spatial distribution and habitat utilisation is undertaken for all bats species using the Regional Park to establish a base-line for future reviews, as at present the information available is too incomplete to be of great value. Nevertheless, it is also acknowledged that implementing landscape-scale bat surveys is inherently difficult, as is drawing accurate conclusions from data evaluation; whilst modelling and predicting species-habitat correlations, as an alternative, is often inadequate and contradictory. Inevitably new technologies will provide solutions just as they have with ornithology e.g. long-distance tracking of migratory species to identify resource reliance. Remote recording is now beginning to be utilised on large-scale projects, such as in BTO Norfolk Bat Survey. Whether these are practical and relevant to the Park in the immediate future, or indeed the life of the proposed BAP, would need further evaluation.	Noted - the best practice survey methodology will be investigated before undertaking survey work	Review survey methodology prior to commencement

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	pages 23/24	Priority Species		Bats (all species) are identified as priority species justifying Species Action Plans, this having been developed as part of the previous Lee Valley Regional Park BAP (2000). Whilst bats are often considered as a group the ecology of different species can be significantly varied and as widely different as, say, that of a Kingfisher and a Bittern (two species with their own plans). Notwithstanding the justification provided on page 65, a Natterer's bat (Myotis nattereri) is considerably different in its ecology from, say a Nathusius' pipistrelle (Pipistrellus nathusii) – both species of which have their own Action Plans in other contexts. This is not necessary a justification for having separate plans for individual species, but just a recognition that grouping species under one plan has potential limitations (also see next paragraph).	Noted - it is hoped that working towards improvements in habitats such as improving connectivity, reducing light pollution and improving invertebrate numbers will see a general improvement in habitats, within which the specific niche requirements of different species will be improved	No Change
	Page 65	Bat SAP		Again, in response to the collective Species Action Plan, it should be emphasised that certain species may require particularly specific strategies. Bats vary considerably in their ecological requirements and this is one reason that individual species are subject to dramatically different population trends. Of particular conservation concern in Essex is serotine (Eptesicus serotinus). National monitoring indicates stable populations, but all anecdotal evidence from our local surveys is suggestive of long-term declines. As before, the ecological differences we see in birds for example, are no less varied in bats including migratory abilities.	Noted - response as above	No Change
		Current Status		Two species that should be mentioned in this section: Soprano pipistrelle (pipistrellus pygmaeus) may be the most populous species within the Valley and certainly has the largest known roosts. Natterer's (Myotis nattereri) is virtually unknown from field surveys (although it has been found on recent surveys at Royal Gunpowder Mills) and yet is the bat most likely to be encountered in artificial hibernacula.	Agreed	Amend and add text under section Bat SAP - Current Status as follows: In the Lee Valley nine species of bat have been recorded, the Common Pipistrelle Bat (Pipistrellus pipistrellus) being one of the commonest species with some large nursery colonies recorded roosting in the buildings nearby. These bat populations will be heavily dependent on the quality of the feeding habitat within the Lee Valley. The Soprano Pipistrelle (pipistrellus pygmaeus) may be the most populous species within the Valley and certainly has the largest known roosts. Natterer's (Myotis nattereri) is virtually unknown from field surveys, although recently recorded at Royal Gunpowder Mills and is currently the bat most likely to be encountered in artificial hibernacula.
		Current Action		We are not entirely sure that the Actions set out in the previous BAP (2000) were fully implemented and therefore could probably not be expected to have contributed significantly to bat conservation. However, the work done is likely to have raised awareness, which in of itself is essential and extremely valuable. Overall, establishing the efficacy of the last BAP is difficult. Any new strategy therefore has to be realistic. Any weakness in the Park's strategy is not unique in this respect and globally we have failed to tackle the issues arising from large-scale changes that have seen all bat populations dramatically decline over the last 50-60 years. The Park is hardly in a position to address the national or regional scale invertebrate decline, widespread use of chemicals, housing and infrastructure development and unrestrained use of lighting. Of course, local efforts can and should be made and they are likely to be comprehensively more effective when done in partnership with other bodies.	Agreed - LVRPA are keen to working partnership with relevant organisations to take forward the BAP	Ensure all relevant bodies are invited onto the Bat SAP.
				Without strong conservation evidence it is difficult to advocate particular actions that will have demonstrably positive outcomes. However, the lack of conclusive scientific evidence does not mean that certain actions should not be undertaken as it is possible to protect and enhance habitat features and ecological resources that will almost certainly benefit bat conservation e.g. activities that promote invertebrate populations (particularly Diptera, Lepidoptera, Coleoptera and Trichoptera); establishing a comprehensive network of uninterrupted dark flight corridors with cover and shelter; maintaining unpolluted and healthy wetlands with rich marginal vegetation; and encouraging adjacent land owners to reduce light pollution in to the Park.	Noted	No Change
				The following would therefore seem a good starting point and also aligns with your stated objectives: 1. IDENTIFY WHERE BATS ARE, WHICH SPECIES AND HOW THEY USE THE LANDSCAPE: Establish a long-term monitoring and mapping project for bats throughout the park. Encourage and support projects as exemplified by 'Nature-Smart Cities'. Work with Bat Conservation Trust, local universities and others to explore opportunities to promote the Regional Park as a field laboratory for bat conservation. Identify the most productive foraging sites and the places most frequented by bats. Ensure that protection and enhancement is targeted at these and the linkages to them. 2. PROTECT AND ENHANCE KEY HABITATS AND SITES: Protect and enhance green infrastructure, so as to ensure linked foraging sites which are cable of supporting increasing invertebrate biomass. If we cannot protect our aerial insects and their habitats, then other efforts to conserve bats by other means may end up being of little value. Ensure 'protected' path ways within and linking to the outside which comprise corridors free of unnecessary light pollution (using, for example, lighting triggered only when it is needed). These should wherever possible consist of continuous natural shelter (tree lines, hedgerows). 3. RAISE AWARENESS AND PROMOTE CONSERVATION: Continue to promote bats and bat conservation through advocacy (with respect to other organisations) and public events.	Noted	Amend text under section Bat SAP - Action Plan Objectives as follows: • Increase understanding of the distribution and habits of individual bat species in the Lee Valley to guide future management • To identify and protect key sites in the Lee Valley through appropriate management of bat roosts, commuting routes and key feeding areas ~~within the Lee Valley~~ • ~~Support the monitoring effort of local bat groups to increase understanding of their distribution and habits to guide future management~~ • To raise awareness of bats and promote their conservation with those people working within the Lee Valley and the general public
East Herts District Council				Overall, East Herts Council supports the Biodiversity Action Plan.	Support noted and welcomed	No Change
				In terms of making the BAP more effective, the Council recommends that some of the Action Plan Objectives are expanded with an explanation of how the objectives will be met; whether it is a link to existing actions, a new project or form of monitoring.	This will be developed through the production of the SMART targets for each HAP and SAP.	No Change
				It may also assist if the objectives and actions are compiled in a comprehensive table. This table could list the objective, the actions, the season and/or frequency of monitoring, costs of projects and the responsible authority. This will enable the easy identification of actions and the resources required. This would also help to identify opportunities towards which Section 106 contributions could be directed.	Agreed	Compile table of actions and objectives once SMART objectives have been finalised
				The Council recommends adding the host borough/district(s) of each SSSI listed in Table 2.	Agreed	Add text to Table two as follows: Local Authority East Herts District Council East Herts District Council Broxbourne Borough Council Epping Forest District Council Epping Forest District Council Epping Forest District Council London Borough Enfield London Borough of Waltham Forest London Borough of Waltham Forest
				Furthermore, there is an error in Table Three – Non Statutory Locally Designated Sites in the Lee Valley. Carthegena Estates is listed as being within East Herts District, when it should be recorded as being within Broxbourne Borough.	Noted	Amend text in Table Three as follows: ~~East Herts District Council~~ Broxbourne Borough Council
				I've mainly reviewed the Rivers and streams section of the BAP, as this is most appropriate for our work. Many rivers and streams are in a pretty poor state (ecologically function wise), across the park and this is even more so within London. This is mainly for two reasons – morphological and water quality.	Noted	No Change

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Thames 21				The morphological reasons are difficult to deal with due to the significant flood risk issues, Navigation or because the rivers support Water levels within designated sites so can't be changed without impacting on the SSSI/SPA. My question would be how is the BAP helping to drive forward the delivery of morphological improvements? Should we look to target specific areas or lengths of river? Perhaps a combined approach is worthwhile? I imagine that we might be able to come up with some targets for London with regard to floating reedbeds on the Lea Nav – CRT are identifying specific locations for the Limehouse Cut at the moment (hopefully it will be the majority of it). It could be a target to quantify the length of reedbed to be built in London by year 1 of the BAP and then go from there?	It is hoped that the BAP will draw together key organisations to look at solutions to identified issues. Identifying key stretches will be key to the success of delivery. Identification of areas for floating reedbed along watercourses would be useful with targets for completion of this as the BAP progresses.	Include Thames 21 in the relevant HAP's
				Water Quality is probably the most significant issue facing rivers within Lea Valley Park. The problem is that the issues are really difficult resolve and the sources of the problem are outside of the park so how does the Lea Valley BAP address these issues? I've attached a presentation which we recently gave to the EA regarding our Community Water Quality Modelling programme which is looking at how Green Infrastructure or particularly Constructed Wetlands can be used to improve water quality at a catchment scale. The presentation probably needs a bit of explanation, however hopefully you can see that if all the wetlands were implement we can delivery status change of these water bodies (although not always to good). We also haven't quantified what the impact on the Lea Nav etc will be. The other issues which springs to mind given recent events is pollution incidents, should the BAP look to address this? The community modelling project hasn't really addressed this element, more the normal water quality as opposed to a specific pollution incident.	The BAP will work alongside the Lea Catchment NIA and River Catchment Partnerships to deliver enhancements, both these partnerships have a wider reach and can assist in the delivery of schemes that will benefit the area covered by the BAP. Some of these issues could fall under awareness raising to encourage communities to report incidents to EA to ensure they get dealt with.	No Change
				How is the BAP looking to drive Ecosystem Change? Work these days is less about specific projects or locations about overall ecosystem health and how we might work to deliver a healthy river system. How is the BAP looking to do this for the 3 key principles of healthy rivers and streams i.e. Water Quality, Flow and Morphology?	The BAP is working on a landscape scale with and overarching aim that can be moved towards by the delivery of individual projects alongside wider initiatives. The BAP will link into wider initiatives such as Catchment Partnerships, the NIA and other landscape scale schemes.	No Change
				I also haven't mentioned invasives, however I think you have this covered.	Noted	No Change
London Legacy Development Corporation				Thank you for this. I've read the Plan and some of the action plan appendices. I just wanted to say that it is really good – informative and an accessible read. I look forward to the final version with the maps as that will help me orientate myself as to where the different areas are and how they link together.	Noted	No Change
ideverde				The draft plan is thorough and detailed, and we support the overarching objectives to link and protect biodiversity through the Lee Valley.	Noted and welcomed	No Change
				Will there be a summary table of actions in the plan? Also maps would be useful, but I see that they will be going in.	Maps will be inserted into the final document and a summery of actions compiled	Compile table of actions and objectives once SMART objectives have been finalised
				Good to see invasive non-natives given a specific action plan and this is something that is likely to be included in the new QEOP BAP. I think it is good to see a plan have a focus on addressing negative impacts on biodiversity, as well as highlighting the positives – the flagship species and habitats etc. This is a habitat action plan that has particular relevance to QEOP as the sections of River Lee through the North Park do suffer from invasive species, so we support any actions for their control/management.	Noted and welcomed	No Change
				On the built environment and brownfield HAP – the recent invertebrate report highlighted lots of interesting finds around the Velodrome brownfield areas. Is it worth including a species action plan for one or more invertebrates in the BAP so that this group is covered?	The priority species list has been reviewed to more strongly reflect the regional and national priorities. It is anticipated that specific actions for invertebrates will be included in the various HAP's	Look at habitat enhancements for invertebrates through the specific HAP's
				Pg 55 on the kingfishers: no records of the birds in our artificial bank during the breeding bird surveys. However we see kingfishers along this stretch fairly regularly, and they could well be nesting further up river, towards the Lee Valley end of the park.	Noted - it is intended to carry out a survey of Kingfishers in the Regional Park	Include SMART target under Kingfisher HAP to undertake a survey of Kingfisher in the LVRP.
				GiGL – Ruth will check on the GiGL agreement as that would be held by LLDC. Our dataset (up to end of 2017) is with GiGL – the ability to share data would be beneficial.	Noted and welcomed	No Change
				We mentioned the possibility of sharing some survey work at the recent meeting. I noticed in the bat species action plan that you want to expand the local bat group surveys? Maybe we could do something on the LV/QEOP border this year?	Noted and welcomed	Arrange meeting to discuss sharing survey effort across QEOP

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Herts County Council				1. There should be some reference to **NPPF** given the references to other strategic and policy documents – this should be the 2012 document and current draft?.	Noted and agreed	Add text under Biodiversity Action - A national response section as follows: The National Planning Policy Framework (NPFF) published in July 2018 sets out the Government's planning policies for England and how these should be applied in order to contribute to the achievement of sustainable development through three overarching objectives. The environmental objective states that the planning system should to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy. Local Planning Authorities should develop Local Plans which apply a presumption in favour of sustainable development unless there would be adverse impacts which would significantly and demonstrably outweigh the benefits assessed against the NPPF taken as a whole.
				2. There should also be a reference to the Governments 25year Environment Plan to bring the approach up to date.	Agreed	Add text under section Biodiversity Action - a national response as follows: The most recent environment plan 'A Green Future: Our 25 Year Plan to Improve the Environment' sets out government action in England to help the natural world regain and retain health through the achievement of a set of 25–year goals which are: • Clean air • Clean and plentiful water • Thriving plants and wildlife • Reduced risk of harm from environmental hazards such as flooding and drought • Using resources from nature more sustainably and efficiently • Enhanced beauty, heritage and engagement with the natural environment In addition, they aim to manage pressures on the environment by: • Mitigating and adapting to climate change • Minimising waste • Managing exposure to chemicals • Enhancing biosecurity It is intended that this plan will be revised and refreshed during its lifespan in order to take account of fast-moving changes in science, technology and our society. (fully referenced)
				3. There should at least be some mention of the Local Nature Partnership – given the Network Mapping and Wildlife Sites project are at least functional and now considered outputs of this partnership.	Noted and agreed	Add text under section Landscape Scale Conservation in the Lee Valley as follows: Local Nature Partnerships Local Nature Partnerships (LNPs) were formed following the publication of 'The Natural Choice: securing the value of nature' . They aim to bring together partners to work in a strategic way to help manage the natural environment to produce multiple benefits for people, the economy and the environment. There is an active Local Nature Partnership in Hertfordshire and whilst a partnership is registered in London it is currently under-developed.
				4. The should be maps showing key features and issues – such as Statutory and non-statutory sites, and perhaps a contextual map showing the relationship of the valley to its hinterland of Broxbourne woods, Epping Forest and catchment area to the north -the Lea and Stort valleys and tributaries.	Agreed - this was highlighted in the draft document	Insert maps as noted
				5. Each HAP or SAP should have a map of the known extent of the resource or species distribution itself. Where there is any data on changing resources / numbers etc. over time, this may be helpful to highlight the status of these.	A distribution map will be included within each action plan, this will provide a baseline upon which future change can be monitored.	Insert distribution maps into action plans
				6. Who is responsible for implementing and or funding the work required to deliver the plans?	Funding will be sought out by the delivery partners, potential funding streams could be identified through the SMART targets	Look at potential funding streams for each action
				7. Are any areas of the LVRP in receipt of agri-environment support? This should be included with appropriate dates to provide some context and increase the profile of management requirements generally within the area.	Section on Agri-environment schemes has been inserted. Expiry dates not specifically noted as agreements may be on private land.	Add text under section Landscape Scale Conservation in the Lee Valley as follows: Agri-environment Schemes Agri-environment schemes provide funding to farmers and land managers to farm in a way that supports biodiversity, enhances the landscape, and improves the quality of water, air and soil. The objectives of the current Environmental Stewardship scheme include: • Wildlife conservation (biodiversity) • Maintenance and enhancement of landscape quality and character, by helping to maintain important features, such as traditional field boundaries • Protection of the historic environment, including archaeological features and traditional farm buildings • Promotion of public access and understanding of the countryside • Natural resource protection – if taken up across large areas of the countryside, it will help to improve water quality and to reduce soil erosion and surface run-off. There have been a number of agreements across land-holdings in the valley which can provide targeted enhancements for biodiversity. The availability of funding and range of options available can impact on the effectiveness of these schemes.

Organisation	Page Number	Section Title	Current text	Comments	Response	Action
				8. Are there any plans to 'zone' areas of the park where biodiversity is given priority? Clearly some species would benefit from areas of high quality, undisturbed habitat or where this is tightly controlled. Without this I can't see how some species – perhaps bittern and otter – are going to become well established or increase their numbers or breeding populations. Given the increase in leisure pressure due to local and regional development, this is a difficult issue but does need to be raised.	This document does not look to zone areas for specific activities, however this can be seen to be done to some extent through the extensive network of statutory and non-statutory designations.	No Change
				9. The range of habitats and species appears sufficient to prioritise deliverable actions related to the habitat and species themselves as well as deliver a wider range of biodiversity benefits by default. However given the general lack of formal support for BAP processes now, some information as to how these will be achieved may be useful, or some specific costed plans. This could be helpful in the event that additional resources may be made available through Biodiversity Offsetting measures via the planning process, although these should seek to deliver opportunities locally. However developments associated with Harlow may be pertinent in this respect.	Noted - this should be addressed through the development of the SMART targets	No Change