

## **APPENDIX 3 – DRAFT LETTER TO EFDC (Cllr JOHN PHILIP)**

CC Natural England

Cc EFDC Local Plan PINS Inspector

Dear Cllr Philip,

### **Epping Forest District Local Plan and Epping Forest SAC Mitigation Strategy**

Thank you for your reply of 5<sup>th</sup> February about progress with Local Plan measures to protect Epping Forest SAC.

#### SAC Mitigation Strategy governance

Firstly, it is very welcome news that a second meeting of the SAC Mitigation Strategy Oversight Group was held on 24<sup>th</sup> February and chaired by your Council officers. Having made the offer to provide governance for such Strategy meetings, in my letter of 28<sup>th</sup> November to all the competent authorities, it is gratifying to see this re-engagement of most parties. There is now the promise of regular meetings of this latter group and I hope that this will now lead to progress with the essential avoidance and mitigation measures. I look forward to working with your Council and hearing more about the governance structure, terms of reference and timetable for this Group in due course.

However, not all parties are engaging with the same, or at least proportionate, level of commitment, and this presents a problem for achieving a comprehensive and full Mitigation Strategy. There also remains the need for coordination between London and Essex as regional entities in this endeavour. I hope that between us we can ensure proportionate, active and coordinated participation by all parties in the Group.

#### Zone of Influence

The proposals to be generated by the Strategy would need to enhance the protection of the habitats around any Forest visitor “hotspots” whilst providing alternative, intercepting destinations (SANGs) within the whole area encompassed by the enlarged 6.36km ZoI. This includes locations within 3km and east, west, north and south of the Forest SAC boundaries. As expressed in my previous letter of 28<sup>th</sup> November, The Conservators do not consider that the limitation of SANGs contributions from developers, as currently set out by the Local Plan, can be justified. I know this concern was also reiterated by us at the Oversight Group meeting of 24<sup>th</sup> February.

On this last point about SANGs, I am disappointed, therefore, that my 28<sup>th</sup> November letter on this matter has not yet been uploaded to the Local Plan website. Given the importance of this issue, and the forthcoming consultation on the GI and SANGs Strategies, I would hope that this will be uploaded soon so that any consultees can be made aware of The Conservators’ position on this matter.

#### Epping Forest Visitor Survey and future costs-undertakings for developing a robust Strategy

The additional data yielded by the Epping Forest Visitor Survey 2019 presented to the Oversight Group, and which your Council commissioned, are important and provide further evidence of the widespread pressures on the Forest. This new Visitor Survey also made obvious the need for, and the importance of, high quality alternative outdoor recreational destinations (SANGs) in the District, and it underscored the kind of characteristics that would be required for these additional SANGs sites to be effective.

I am pleased, therefore, to confirm that The Conservators have approved a financial contribution towards this survey and your costs in commissioning it.

Whilst welcoming this Visitor Survey, the fact that the timing and better weather of the September 2019 survey, compared with the 2017 survey, increased the Zone of Influence (ZoI) indicates to me that a follow-up summer survey (May/June) would be important to consolidate the ZoI evidence. Therefore, as part of the costs-undertakings for the evidence-gathering for the Strategy, we hope that your Council would be willing to contribute financially, alongside us and other parties, to this third survey. We would like it to include an overarching analysis that would bring together all the data from the three surveys and examine the predicted “uplift” in visitor pressure from different locations in more detail.

#### SAMMs development

In relation to managing visitor pressure, we provided some background to our more detailed SAMMs-focused work at the Oversight Group on 24<sup>th</sup> February. The scope of this work is limited at the moment, by time and resources, to a focus on three visitor “hotspots” within the Forest SAC. Therefore, we would welcome a dialogue with your Council and other competent authorities, including Lee Valley Park Authority, as soon as possible, about financial and other support in broadening and deepening this work to inform a more comprehensive access strategy.

We think that it is vital for this access strategy to be developed alongside your emerging Green Infrastructure Strategy (to which we provided our “high-level” response to your deadline of 2<sup>nd</sup> March), as well as the GI strategies of the London Plan and other neighbouring authorities and a reinvigorated Green Arc Project.

Your GI Strategy has yet to be consulted upon more widely and elements of it, in particular its appendices and the detailed SANGs proposals, remain to be unveiled. You have set yourselves and us a tight timeframe for consultation after the Council elections. This is of concern to me. The Conservators consider it most important that this timetable should not prevent a productive dialogue between us and other competent authorities to ensure the development of the necessary detail for, and, crucially, links between, the access, SAMMs and SANGs Strategies. I hope that the governance proposals and the future frequency of meetings of the Oversight Group will take this consultation timetable into account.

#### Quality of management and funding of alternative sites

As well as new sites within the ZoI, the interception destinations I refer to above may include non-SAC parts of the Forest and its Buffer Lands. Throughout all the Mitigation Strategy development work, there needs to be clear evidence offered as to how the alternative destinations would be funded and managed long-term by qualified land managers. There also needs to be evidence and monitoring in place to demonstrate how these sites function to both attract and retain potential Forest visitors for the all-important repeat visits, whilst enhancing biodiversity in the District. We look forward to the discussions with you on the management of these sites across the ZoI and how we may be involved in their design.

#### Air Quality

In relation to this aspect of the Mitigation Strategy, The Conservators reiterate their earlier request that the current SAC Position Statement (ED101, 21<sup>st</sup> October 2019) is replaced with a jointly agreed one that more fairly reflects the situation in relation to competent authority and other roles in Epping Forest SAC protection. We would be happy to work on a joint statement with you and Natural England and look forward to hearing more from you on this.

Finally, I welcome the invitation to our officers for the meeting on 26<sup>th</sup> April, which is to examine further the critical air quality and traffic management issues of the SAC Mitigation Strategy. I hope that this work will provide the much-needed, effective and robust solutions within an amended Local Plan that will ensure the enhanced protection of the Forest and improvements in the condition of the SAC habitats.

Yours sincerely,

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Chairman, Epping Forest and Commons Committee