



**COMMENTS by THE CONSERVATORS of EPPING FOREST  
on the EPPING FOREST DISTRICT LOCAL PLAN (REGULATION 18) CONSULTATION  
(December 2016)**

**Introduction and context**

Epping Forest is owned by the City of London and comprises some 6000 acres (2,500 hectares). It is supported by a further 1,800 acres (730 hectares) of Buffer Lands, acquired by the City to protect the Forest from encroaching development and to maintain the links between the Forest and the wider countryside. The Epping Forest Act 1878 charged the City, as Conservators of Epping Forest, with a duty to conserve varied vegetation and preserve the Forest's *natural aspect*.

The Conservators' comments, in general, are given in response to the Plan in relation to all Forest Land, whether covered by the Epping Forest Act, the Habitats Regulations 2010 or the Wildlife & Countryside Act 1981 or all of these designations. The Conservators consider that the protection and enhancement of the Forest as a whole should be a core aim of the Local Plan.

For example, whilst an assessment of the impacts on the SSSI is not formally part of the Habitats Regulations Assessment (HRA), on which we comment in our 'Additional Comments' to Question 9 below, a consistent approach to both the SAC and SSSI interest features in the Plan is important. In particular, irrespective of any designation, the ancient wood-pasture habitats of the Forest and its network of ancient green lanes are irreplaceable. The European site boundary is clearly part of a wider ecological network and approaches to biodiversity conservation need to be compatible with each other and seek the best outcomes for the natural environment. The ancient green lane network, which is extensive across the District, provides the building block for future, wildlife-rich green infrastructure and green corridors to link other ancient woodlands (e.g. Galleyhill Wood) and other important sites like the Lee Valley. In addition, maintaining the same approach to the Forest as a whole would be beneficial for developers and decision makers as it would avoid confusion, would provide clarity and would reduce the amount of SSSI assessment required at the project level.

## QUESTIONS & RESPONSES

**1. Do you agree with the overall vision that the Draft Local Plan sets out for Epping Forest District? (See paragraph 3.26, Chapter 3).**

### **SIGNIFICANT RESERVATIONS**

#### *Environmental enhancement and biodiversity protection at Vision level*

Although, Epping Forest is specifically highlighted for protection and enhancement in the Vision statement on page 30 of the Plan (Chapter 3), which the Conservators welcome, the wider environment and green infrastructure are not mentioned. The concern of The Conservators is that the current Plan is being, disproportionately, led by housing targets. Other important strategic planning seems to have been set-aside or delayed, leaving noticeable gaps in the Plan. The amount of development proposed seems to be putting great strain on the other parts of the District's Vision.

This concern was reinforced by the original LSCC Core Strategy and Vision. This LSCC Vision, which now underscores the 4 SHMA local authority plans and features prominently in Chapter 2 of this Plan, was re-drafted only after representations by The Conservators in June 2016. The late inclusion of the environment and biodiversity bullet point in the LSCC Vision (see Chapter 2 of the Plan, page 26, 4<sup>th</sup> bullet point), seems to be a pointer to a development-led approach which may lead to the overriding of the environmental planning in the Plan. We would request that the EFDC Vision in Chapter 3, now draws on this bullet point and makes explicit reference to the wider environment and biodiversity along similar lines.

#### *Epping Forest's Vision*

To inform the District's vision, the Plan draws on the LSCC Vision (Chapter 2 page 26) and also the Lee Valley Park Vision (page 29 of Plan) which are both set out in full. Although currently consulting on a new Management Plan, The Conservators also have a published Vision for Epping Forest contained in their existing Plan. **We would request that this is included and set out in full in the future drafts of the EFDC Local Plan (at Reg 19 and beyond).** We consider that it is most important that this Vision is reflected in the Local Plan Vision, given that it came out of joint working with EFDC and other authorities, both in developing a vision for the Forest (*Quality of Life Report 2003 – Levett-Therivel*) and for the wider strategic **Green Arc**.

The Forest's current Vision is:

- *Epping Forest's position as a unique and ancient landscape for people and wildlife will be strengthened*
- *The Forest will retain its natural aspect with the diversity of wildlife habitats enhanced and the features of international importance, including its veteran pollards, protected*
- *The role of Epping Forest as a special place for recreation and relaxation will increase in importance with improved recreational opportunities*

- *The Forest's historic features and buildings will be retained in good condition and accessibility will be improved for the purposes of education and enjoyment*
- *Epping Forest will be highly valued as part of a larger and fully accessible protected landscape area*

### *The Green Arc*

The last bullet point is of particular importance in the context of the Local Plan. It points clearly to the need for a larger, accessible protected area in which the Forest would be embedded, such as is the objective of the **Green Arc**. It also points the way to the importance of alternative green spaces and corridors (SANGS or SANGSC) which will be the step change required in the Local Plan if it is to provision enough open space in the face of the step change which is being proposed in the number of housing units and residents. These new residents will require both built and natural green infrastructure if the quality of life is to be maintained or improved and if the wildlife and wilderness or semi-natural values of nature conservation sites are to be sustained for the long-term.

The **Green Arc** is referenced in *The London Plan* and we would expect its vision to be set out in this Local Plan, especially given the Council's commitment to the concept from the outset. Such an explicit and integrated approach to the District's Green Infrastructure is fully in accord with the Plan's current wording about the protection of links between the Lee Valley and Epping Forest. Also such a proactive and clear approach to green infrastructure would allow developers to respond positively. It would also allow better planning for the embedding of sustainable transport links (e.g. cycling routes, safe routes to schools, quiet ways) and other constructed infrastructure within the green infrastructure in a way that complements, or at least fits in, rather than erodes or disrupts the most valuable environmental assets.

At this point it is worth reiterating that not only does the Forest and its Buffer Lands cover 7% of the District area (Chapter 2 of the Plan) but together they provide well over 40% of the District's open and accessible green spaces and even more of the vital semi-natural element. It seems timely, given the scale of developments proposed, that this Plan should proactively review the responsibilities for future provision and upkeep of such valuable places.

### *Other positive planning for green spaces*

An examination of the maps with this Regulation 18 Plan makes it clear that housing and employment development dominate at the expense of other planning. The IDP (Arup September 2016) remains incomplete and the scale and funding seem not to have been more than sketched out apart from for the M11 junctions. It is noticeable that the opportunity has not been taken to map the Green Arc or other green infrastructure ambitions of the Council. For example, the links between the Lee Valley and Epping Forest are only briefly mentioned and several other strategic links could have been proposed.

For example, The Conservators would also like to propose that making physical green links and access routes between the Lower Forest and the main body of the Forest should be an aim of the Plan. Such a route is available to the west of Epping town, and could link with Swaines Green, Bolt Cellar Lane and Bury Lane. Given the large changes proposed to the

***RESPONSE of THE CONSERVATORS of EPPING FOREST to  
the EPPING FOREST DISTRICT LOCAL PLAN (REGULATION 18) CONSULTATION***

Green Belt here and the large scale new developments this would seem proportionate and positive planning that should appear on future Plan maps.

#### *Chapter 4 – Policies DM3 and DM4*

Policy DM3 – this Policy is welcome given the context (the preamble text in paras 4.110 – 4.114) in which it is presented, the fact that it provides some continuity with the old Policy HC5, and in clearly recognising the importance of Epping Forest to the District. However, in its attempt to reflect the NPPF emphasis on ‘sustainable development’ this policy is also notably weaker than HC5 and its wording seems to imply that protection and enhancement of the Forest are tied to development and possibly even require development. **The Conservators consider that this wording should be improved.** We would like it to reflect that, while development should ensure that it always assists the protection of the Forest, enhancement of the Forest is not linked to development only but to other initiatives for which the Local Authority is responsible, including the planning and promotion of green infrastructure and sustainable transport options.

The Conservators welcome the broad protection given by Policy DM3 through the wording “*biodiversity, character, appearance and landscape setting*” of the Forest. Tranquility and semi-naturalness were the two highest rated features of the Forest from the parish and community stakeholder groups whose opinions were sought for EFDC co-funded Quality of Life Report 2003 (Levett-Therivel). The “*natural aspect*” of the Forest and its links to the surrounding ancient countryside that evolved with it and provided the commoners’ grazing lay-back (support) land are fundamental to the Forest’s value to people and to its future protection. Dark skies are also an important measure of the protection of the Forest and the Conservators look forward to working closely with the Council to continue to protect the whole Forest and not just the SAC from piecemeal, small-scale as well as large developments that might erode these important elements.

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## **2. Do you agree with our approach to the distribution of new housing across Epping Forest District? (See Draft Policy SP 2, Chapter 3).**

### **DISAGREE**

#### *Pattern of housing allocations*

**The Conservators would wish to register a disagreement with the overall approach to the allocation of proposed housing sites across the District.** Whilst the Conservators would accept that there are increased housing needs, the scale of the increases would seem to demand a response in which the housing and infrastructure are completely integrated and the latter is **additional** to the existing infrastructure.

There is recognition throughout the Plan and in its supporting technical documents, especially the *Infrastructure Development Plan* (IDP – Arup September 2016) that the current infrastructure is at capacity in critical places or is not adequate. And yet the approach in the draft Regulation 18 Local Plan, certainly away from Harlow with the splitting up of the development into many parcels, seems to be a piecemeal one with only incremental allocations. Many of these are of an individual size that may not be sufficient to

**RESPONSE of THE CONSERVATORS of EPPING FOREST to  
the EPPING FOREST DISTRICT LOCAL PLAN (REGULATION 18) CONSULTATION**

generate the funding for the required large-scale connected infrastructure. The fact that the large developments to the south of Epping, that are likely to have a very adverse impact on congestion and on current infrastructure, are split into smaller parcels suggests that provisioning and integration of new facilities will be difficult to achieve.

The general approach of adding to the housing in the south of the District, around the urban centres and close to existing transport 'nodes' may be appropriate for incremental developments at historic rates. However, the proposed unprecedented and yet predicted 24% increase in residential populations (Chapter 2), over the 17 years remaining of the Plan period, would seem to require something more coherent and integrated.

The situation at Harlow seems to exemplify this issue. Whilst large increases in housing are proposed there is not the concomitant response of infrastructure in this town, especially in public transport provision. The rail network capacity would seem to be entirely inadequate for current needs, not just those of the future (see also our further comments below), and access to the railway would appear to be not to be favourable for these proposed developments at Katherines, West Sumners and Latton Priory.

The proposed distribution of housing is concentrated around Epping Forest with the vast majority being within 6km of the SAC boundaries. **With no clear proposals for an infrastructure to match the projected increase in population to 155,000 (Chapter 2 of the Plan) The Conservators wish to disagree with the pattern of allocations as currently presented.** We await the development of the IDP, further traffic modelling and a full recreational use survey to underpin future decisions but it is difficult to escape the conclusion that the impacts on the District's environment around the Forest, on Epping Forest itself, and on the SAC in particular, are likely to be adverse. In our view, this does not seem to be in accord with the Local Plan Vision in Chapter 3 at 3.26, which the Conservators have broadly welcomed (see above).

### *Green Belt*

The Conservators welcome the continued protection of the Green Belt on the western flank at High Beach and Sewardstone and to the north-west and north of the Forest around the Cobbins Brook Valley and around the Forest's Buffer Lands. Given that Epping Forest and the Epping Forest Act 1878 were important inspirations for the original Metropolitan Green Belt concept and its design, the Green Belt's continuing embrace around the Forest, its ridge and its associated ancient landscapes of the Lee and Roding Valleys is of fundamental importance to The Conservators.

Accepting any of the proposed changes to the Green Belt boundaries, therefore, is very difficult for The Conservators. We reiterate here our profound concerns about the piecemeal pattern of housing allocations and how this is manifested in the eroding of the Green Belt across a wide area. This widespread erosion, unlike the one-off opening of part of the Green Belt for a new settlement, seems to make the boundaries more vulnerable to many more future changes and makes them seem less easy to defend. Furthermore, the proposed extensions of Theydon Bois and Epping to the east, with long, convoluted changes to the Green Belt boundaries, seems to open up the possibility of future infill to a new hard boundary of the M11. The M11 could be seen as a 'de facto' boundary and by-pass to these

towns and the pressure for infill from developers seems likely to follow in a way that would not follow from a single new settlement approach.

*District Open Spaces (DOS) – e.g. at Waltham Abbey*

On this theme of the weakening of the Green Belt protection for the Forest, the new NPPF designation of District Open Space (DOS) being deployed in this Plan for the first time, seems to pose a similar threat to boundary integrity. The case at Waltham Abbey is ostensibly to resolve the issue of creating “holes” in the Green Belt. However, the decoupling of this area from national Green Belt policies and guidance seems, in our view, to make the area more vulnerable to future Plan reallocations. **To avoid this circumstance, we would seek assurance from the Council that in the next iteration of the Local Plan there would be clear plans for this new Waltham Abbey DOS to become a new SANG with enhanced access and wildlife features for the local communities nearby to enjoy.**

*Enforcing and Monitoring Current Green Belt Protections*

The Conservators also remain concerned that, even where Green Belt is protected and even “washes over” existing hamlets to ensure its open nature is fully integrated with older settlements, the Green Belt is not well enough safeguarded. And where safeguarding lapses, as recently at High Beach and Gilwell Hill, we are concerned that these do not then become “Trojan Horses” for additional development and Green Belt boundary erosion which might bring its status into question. To illustrate this problem, we attach a map illustrating just some of the approved new developments and potential pressures that have built up at High Beach, the hamlet most intimately associated with the Forest, despite its Green Belt status (**see Land at Lippitt’s Hill map attached**). Further development here could allow the Green Belt and also the Council’s commitment to the protection of the Forest to be undermined inadvertently.

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**3. Do you agree with the proposals for development around Harlow? (See Draft Policy SP 3, Chapter 3).**

*Harlow expansion*

It seems logical to concentrate development and housing at Harlow to ensure this town’s economic outlook can be improved but in a manner that will ensure infrastructure is provided to the scale required to ensure sustainable development rather than creating more congestion on the road network (see comments below on the M11). It is not clear from the EFDC Reg 18 Plan alone, separate from the neighbouring Local Plans in the SHMA area, whether the locations and the quantum of housing would achieve this objective. The evidence for new supporting public transport infrastructure (as opposed to more road-building) seems thin.

Another concern of the Conservators is that the original plans and design of Sir Frederick Gibberd for Harlow New Town should be respected and re-invigorated. This would ensure that the ‘green wedges’ should be enhanced by any construction in the Epping District and that the townscape, including any new housing, should remain delimited within the “bowl” or topographical depression that keeps Harlow north of, and hidden from the south by, the Epping Long Green ridge. This would ensure that the ancient landscape to the north and

north-west of the Forest remains intact from a landscape perspective and that the biodiversity and access to green spaces also remain protected.

#### *Latton Priory proposal*

Both of these issues have large implications for the viability of any proposed development at **Latton Priory**. The proposed north-south sustainable transport corridor for this development site, which the Conservators would regard as an essential prerequisite to development in order to protect the Forest from increased traffic flows and congestion along the B181 and B1393, seems likely to impact on a Harlow 'green wedge' at this point (see page 21 of the IDP, Arup Sept 2016). It is also unclear to The Conservators at this point whether the number of houses proposed would allow sufficient funding for this sustainable transport link, especially if it were an optional choice alongside an alternative such as a road link to the B1393/M11 J7. The latter would not be acceptable, or at least certainly not without the sustainable transport option.

In addition, to ensure the development did not impact on the Forest's visual landscape amenity there would need to be a green open space protected within the southern section of the Latton Priory development envelope. This latter green space would also be required, in our view, to provide a substantial SANGC for the large number of residents of this site in order to further protect the Forest and the SAC which lies within 5km of this proposed development.

Therefore, given the above potential constraints and pitfalls, the sustainability of this development remains open to question in our view.

#### *Infrastructure concerns in relation to Harlow*

The current lack of infrastructure and the limited future funding from the Central Government or County Council for strategic infrastructure, which this scale of development demands, is of considerable concern to the Conservators. With M11 J7A becoming a priority, there seems to be no immediate plans for other infrastructure to cope with the proposed housing south and west of Harlow within the District.

The M11 J7A scheme, either in isolation or even with the limited road improvements planned elsewhere, seems unlikely in the Conservators' view to have a beneficial impact on Epping Forest and the current or predicted levels of traffic congestion, air and noise pollution within the Forest's road network.

This is borne out by the Traffic Forecast Modelling Report (TMF) provided for the 7A Scheme by Jacobs. The 'do minimum' (DM) traffic flow forecasts for 2021 and 2036 under the medium and high growth scenarios in Figures 11.4 and 11.5 (page 118 of the TMF) show very large increases in traffic flow along the A121 and B1393 within the Forest. For congestion, as illustrated by turn delays in Figures 11.9 to 11.12 (pages 128 & 129 of the TMF document), significant increases are also predicted in areas that are already suffering congestion – such as Crown Hill (Junction R in the TMF) and Bell Common (Epping signalised junction B in the TMF). It is also to be noted that the detail of Wake Arms roundabout and the A121 is not illustrated in the TMF report.

Such increases would not be environmentally sustainable for Epping Forest as they would have a detrimental impact on air quality (and thereby the integrity of the Special Area of Conservation(SAC)) and on the Forest's *natural aspect* (to be protected by The Conservators under the Epping Forest Act 1878).

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4. No comments at this stage

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**5. Do you agree with the proposals for new employment development? (See Draft Policy E 1, Chapter 4).**

The Conservators wish to raise concerns over the proposed development of **SR0061B** at Waltham Abbey. This lies close to J26 of the M25, and the A121 Woodriven Hill route through the Forest. Although the potential future use is not indicated, given the location of this site and probable access to it, there is potential to further add to the problems of congestion and pollution at J26 and along the A121 through the Forest.

**6. Do you agree with the proposed sites in your area? (See Chapter 5) Do not feel that you have to comment on all of the areas.**

These comments below should be read in the context of the responses to Questions 1 – 3 above and The Conservators have considerable reservations about a number of the proposed allocations for the reasons given. In addition there are some notable concerns:

The “densification” of Epping, whilst seemingly linked to its location on the Central Line, creates a very major cumulative development which the current road infrastructure would not be able to accommodate and which, given the routes to the motorway network is likely to have an adverse impact on pollution in Epping Forest. We await the detailed traffic modelling work which remains to be carried out before making further comments.

The allocation at Theydon Bois is a very large block of housing which would represent over 20% increase in the population of this settlement. This would need a SANG in our view, despite the lower than 400 house threshold (see HRA para 6.4.10).

At Loughton The Conservators would disagree with the proposed loss of green space at Borders Lane and Jessel Green. The latter site in particular, if lost, would place considerable pressure on the nearby Forest and also would seem to be in contradiction to the green infrastructure policies in the draft Plan. Such a large green space is currently valuable and has considerable potential to be developed for both access and for wildlife.



The large scale proposals at North Weald do not seem to have any concomitant infrastructure and this housing development could significantly increase road traffic through Epping Forest. It does not seem sustainable without considerable new transport infrastructure including a new link to the A414.

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**7. Do you agree with the approach to infrastructure provision being proposed in the plan? (See Chapter 6).**

**DISAGREE**

The current IDP is still very vague and little work seems to have been done on infrastructure other than the M11 junctions, considering a 21% increase in housing is proposed for the District. It is not at all clear how the required infrastructure will keep up with the pace of the development, as the Plan implies will be possible.

The Conservators would disagree with the seemingly, perhaps inadvertently, complacent statement in relation to the LSCC Core Strategy and Vision that the District is well-served by rail. As the IDP points out people are driving from Harlow to use the Theydon Bois Central Line Station and this situation seems likely to worsen with no clear rail strategy at Harlow. Harlow housing developments in the EFDC area will not be served by any improvements on present evidence.

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**8. An Interim Sustainability Appraisal has been commissioned to support the Draft Local Plan. We would welcome any comments you may have on this. (See Technical Document page).**

No comments at this stage

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**9. Do you wish to comment on any other policies in the Draft Local Plan?**

An important additional document, which we only received in the last two weeks of the consultation period, but which relates specifically to Epping Forest SAC, is the **Habitats Regulation Assessment Screening Report (Nov 2016)** by AECOM ('the HRA'). Additional comments on this document are given below.

**ADDITIONAL COMMENTS**

**Urbanisation**

In paragraph 5.2.8 of the HRA (AECOM Nov 2016) it states: *"the fact that urbanisation is not currently considered a significant problem, it is considered that additional development will not materially increase the risk posed to the site and certainly should not be an obstacle to*

***RESPONSE of THE CONSERVATORS of EPPING FOREST to  
the EPPING FOREST DISTRICT LOCAL PLAN (REGULATION 18) CONSULTATION***

*allocation*". **The Conservators disagree with this conclusion.**

Although it is the case that the Site Improvement Plan (SIP) for the SAC does not specifically refer to the issues listed in the HRA as resulting from urbanisation, such as fly-tipping, cat predation and light pollution, the absence of a reference to an impact does not mean these are not problems, nor could be issues in the future.

#### *Alien species introductions*

Firstly, there is the direct impact of the introduction of alien species through fly-tipping and garden waste, which is exacerbated by urbanisation. One of the greatest current threats to the SAC and its vegetation is *Phytophthora ramorum* or Ramorum disease. This threatens the health of both Beech and the Forest's heathland plants. The fact that the disease has shown up in the Forest some distance from other UK outbreaks suggests that it has been introduced inadvertently at some point; it is relevant here that garden waste and plantings were the main source in the original spread of this disease across the counties of southern England. The HRA suggests that urbanisation impacts may be dealt with at a Project level (para 5.2.8 of the HRA). However, it is hard to see how a developer can mitigate for this adverse impact and we request that this needs to be tackled at Local Plan level with appropriate protective policies towards the Forest environment.

Secondly, recreational disturbance *is* an issue in the SIP and urbanisation of the Forest is likely to increase the adverse effects associated with this factor (e.g. in relation to ground-nesting birds, land management of heaths). Thirdly, it is hard to imagine how issues such as incidental arson can be resolved at project level and such issues are clearly best resolved with a strategic policy, i.e. at Local Plan level. **The Conservators, therefore, request that urbanisation impacts are fully taken into account in Local Plan policies with respect to the Forest.**

#### *Fly-tipping and litter*

In addition, there are several other long-standing issues, like fly-tipping, which result from urbanisation that are a considerable cause for concern to the Conservators. For example, the annual cost of dealing with fly-tipping and litter amounts to around £250,000 from the Forest's budget. Therefore, this has a significant indirect impact on the Conservators' ability to sustainably manage and enhance the Forest's environment, including its SAC special features.

#### *400m buffer distance*

Although the 400m distance has some precedence in considering the protection of an international site (e.g. SPAs), recent evidence suggests that this distance may not be sufficient for issues like cat predation. In addition, in this current HRA the 400m buffer is being used as a "trigger" threshold for mitigation rather than a buffer zone. Given this approach and the above concerns over urbanisation the Conservators would request that this suggested approach is reviewed and that a justification is given for the adoption of a 400m threshold or any other threshold that relates to the Forest habitats and interests. We would reiterate here that the SSSI habitats and the Forest's "natural aspect" should also be considered by the Local Plan in relation to urbanisation to ensure clarity of purpose in the protection of the irreplaceable.

**RESPONSE of THE CONSERVATORS of EPPING FOREST to  
the EPPING FOREST DISTRICT LOCAL PLAN (REGULATION 18) CONSULTATION**

The threat of urbanisation to the Forest's "natural aspect" was highlighted in the 2003 *Quality of Life* Report (see above comments) of which EFDC were co-funders.

### **Recreation impacts**

The large volumes of housing proposed in the current Plan will generate significant additional recreation pressures on the Forest. Although the 5km zone proposed in the HRA seems likely to be linked to the zone within which 75% of visits may be generated, housing outside this zone, particularly in concentrations such as at Harlow are likely to have a significant impact. It is necessary for the Plan to have regard to this in defining where impacts may arise and what mitigation is required. The HRA needs to recognise this distribution and the Plan needs to ensure that solutions will be in place.

### *Thresholds*

Whilst we welcome the proposals in the HRA to tackle recreational pressures through the levying of a tariff for the Forest and the provision of SANGs it is not clear that the HRA, nor more importantly the Local Plan itself, has fully encompassed this issue of the scale of the proposed developments and the likely cumulative adverse impacts. As the HRA acknowledges on para 6.4.7 further work is needed on recreational pressures and the SAC Site Improvement Plan (SIP) also makes this point about the uncertainties involved.

**The Conservators do not consider that setting a threshold of 400 houses in a single development, as recommended in the HRA at 6.4.10, is appropriate therefore.** This 400-house threshold does not seem to have been devised on a precautionary basis and it is not clear what is the supporting evidence for such a threshold. In other cases, such as the Thames Basin Heaths, any development of 50 houses or more that is proposed within 5 and 7km needs to be the subject of project level HRA and may require additional mitigation measures. It is yet to be determined through the MoU process what the optimum approach is for Epping Forest SAC.

Any threshold is also susceptible to being circumvented. Instead we consider that the cumulative impacts need to be taken into account across a settlement. For example, there are very significant proposals below 400 houses such as the 360 houses at Theydon Bois or the cumulative total of 804 houses across 3 site allocations in Epping (SR0153, SR0069/33 and SR0113B). In doing so we would suggest that some consideration should be given to a sliding scale in relation to the size of the developments and the contribution of or towards SANGs and recreational provision in the Forest.

### *SANGS*

Currently, in the *Recommendations* in **paragraph 6.4.10 of the HRA** (AECOM November 2016) only the development at Waltham Abbey (**SR0099**) of over 400 houses is listed as requiring a SANG. The Conservators consider that the Plan needs to adopt a much more proportionate requirement for SANGs across this area of the District to ensure the Forest's *natural aspect* and the SAC habitats are protected. This issue of green space and recreation is also tackled at the beginning of this letter in answers to Questions 1 and 2.

In relation to amounts of provision of green space we welcome the setting of a target. However, we consider the HRA should make clear that the 8ha per 1000 threshold is national established practice (not a standard) and, importantly, it should explain why it can be justified as being locally appropriate.

In addition to the overall quantum of SANG provision, consideration needs to be given to the length of walk that a SANG can provide. This requirement is additional consideration to the overall size to be provided; it is not an alternative means of quantifying the size, but can of course influence the size and shape of a SANG. Visitor surveys that incorporate questions relating to the typical walk undertaken are normally used to determine the length of walk required. Experience shows that this can differ in different locations, but in the absence of locally specific information, the distances used elsewhere in similar circumstances could be reviewed. Typical dog walks from other visitor surveys are in the region of 2.5km and so significant green space is necessary to accommodate such routes.

### **Air pollution**

In relation to the Jacobs consultancy's AADT traffic modelling we reiterate our response made to the AECOM assessment of air quality and pollution impacts from traffic that further and better traffic modelling is required for the Forest roads and that congestion and queuing in general must be factored into the analysis. In addition, we reiterate the point that we do not accept that house allocations already made should be considered part of the *Do Minimum* scenario, as has been repeated in the HRA here (Appendix D of the HRA).

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### **Memorandum of Understanding on Epping Forest**

Related to the HRA of the Plan there remains a significant amount of future assessment work to be carried out to ascertain the likely impacts on Epping Forest SAC and what mitigation strategies might need to be put into place. Therefore, in our view, and contrary to the view expressed in the HRA, it is necessary for the Plan to identify that recreational and other pressures need to be dealt with and that the MoU is part of this necessary process of analysis, and that mitigation is currently being progressed through the MoU.

In the light of this, on **page 30 of the Plan in the District Vision** we consider that the MoU should be included specifically in the relevant bullet point about the Forest as a key mechanism by which the Council aims to protect and enhance the Forest. In addition, in relation to the Plan and future developments that might enhance Epping Forest, the status of the MoU should be re-emphasised in **Policy DM3 A** also.

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