



Planning and Development

Extension: 5770
Please ask for: Mr Martin Paine
Date: 18 December 2019

Graeme M. Smith
Chairman,
Epping Forest and Commons Committee

Dear Mr Smith,

Emerging Epping Forest SAC Mitigation Strategy

Thank you for your letter of 28 November regarding the above matter.

I note that your letter addresses two matters, in your own words:

"an offer that The Conservators convene and chair an SAC Mitigation Strategy Steering Group/Oversight Group of officers, to meet at agreed intervals to ensure governance of its development and implementation".

Secondly,

"In order for The Conservators to be able to continue to provide this level of expert advice and assistance in the preparation of the Mitigation Strategy, particularly in relation to SAMMs [Strategic Access and Management Measures], we request that you as competent authorities each provide a costs undertaking to help with the expenditure and resources required to develop these proposals and to examine options for sites within the Forest, as well as tackling SANGs and air quality issues around the Forest SAC."

In relation to your proposal to convene an officer steering/oversight group, I have spoken to Martin Paine, Planning Policy Manager at Broxbourne Council (copied), who has been leading work on the Broxbourne Habitats Regulations Assessment (HRA). He has confirmed that he is happy to attend such a meeting, insofar as the matters addressed relate to impacts on the SAC arising from the Borough of Broxbourne.

It is clear from your letter that the Conservators anticipate significant costs in relation to the mitigation strategy for the SAC. In relation to air quality, Natural England has stated that *"The air quality assessment, which included the Local Plan allocations within Broxbourne Borough, concluded that there would be negligible impacts from such development outside Epping Forest District alone and that Epping Forest Local Plan is the dominating contributor of pollutant emissions when considered in combination with surrounding authorities."* (letter from Aidan Lonergan, 6 November 2019, included within Appendix C to Broxbourne Main Modifications HRA). Therefore it is not anticipated that Broxbourne Council will contribute towards costs in relation to air quality matters, unless new evidence becomes available.

In relation to recreational impacts, Broxbourne Council will be happy to contribute funding towards the costs of preparing the mitigation strategy in proportion to the extent to which evidence indicates that such impacts arise from the Borough of Broxbourne, or some other appropriate formula which reflects the relatively small number of visitors to the SAC from the Borough of Broxbourne.

In relation to funding for the costs of the measures contained in the mitigation strategy itself, policy NEB2 of the Broxbourne Local Plan states that "*where necessary, financial contributions towards the measures set out in any Epping Forest mitigation strategy for recreational impacts will be sought from residential developments within the Epping Forest ZOI [Zone of Influence] in order to mitigate and avoid in-combination effects on the SAC.*" It is understood that at present such contributions are sought only from the inner ZOI, which does not include Broxbourne, although this could change in future depending on the evidence.

Yours sincerely,



Councillor Keith Brown,

Cabinet Member for Planning and Regeneration

CC:

Martin Paine, Broxbourne Borough Council

Sarah Fraser, Natural England

Jamie Melvin, Natural England