

Chairman, Epping Forest and Commons Committee

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Dear Councillors Philip and Bedford

RESPONSE to the EPPING FOREST DISTRICT COUNCIL GREEN & BLUE INFRASTRUCTURE STRATEGY CONSULTATION – JUNE/JULY 2020

1. We are grateful for a second opportunity to respond to your Council's proposed Green & Blue Infrastructure Strategy (hereinafter referred to as the G&BIS), following our response to you of 2nd March.
2. As we stated in our 2nd March response and in previous correspondence, the implementation and funding of Suitable Alternative Natural Greenspaces (SANGS) are critical to the future protection of Epping Forest Special Area of Conservation (EFSAC). Although our comments cover all chapters and the range of proposals and ambitions contained in this G&BIS document, our overriding concern is with the likely effectiveness of the SANGS Strategy contained therein. Therefore, our comments on the SANGS element of the document form the first and major part of our response and strongly influence our overall conclusions.

Our key concerns are:

3. The G&BIS only sets out a requirement for SANGS associated with the masterplanned developments and there is not enough clarity to provide confidence that the mitigation is fit for purpose for these developments on their own;
4. More widely, there is no SANGS provision for housing away from the masterplanned developments. A clear, comprehensive strategy that provides effective mitigation for the quantum of housing growth is necessary. A wider range of infrastructure, away from the masterplanned developments, is required and needs to be clearly secured;

5. Mitigation measures should be effective, reliable, timely, guaranteed to be delivered and as long-term as they need to be to achieve their objectives. The strategy as drafted does not provide the fundamental information necessary to demonstrate that the Council is able to comply with the Habitats Regulations and would be able to rule out adverse effects on integrity as a result of the housing growth proposed in their plan;
6. There is no clear timetable or governance for delivering SAC mitigation, including SANGS.
7. We suggest that the SANGs component should be a separate strategy, ensuring that the measures that are necessary as mitigation are clearly set out for developers and others. These measures need to be separated from more aspirational elements within the G&BIS so that there is no doubt as to how SANGs will be provided, how they will function and how the legal obligations are fulfilled. Such an approach would provide a much better opportunity for SANGs delivery to be joined-up with neighbouring authorities to provide certainty that the in-combination effects of growth on recreation use of Epping Forest SAC are addressed.

General Context

8. As before in our previous response, the City Corporation particularly welcomes this example of closer cooperation on such an important document, which will form an integral part of the new 15-year Local Plan. We are pleased that our comments of 2nd March were helpful to the process of developing the G&BIS.
9. The G&BIS contains a broad range of positive messages about green space and we congratulate the Council on seeking to take such an ambitious and holistic approach. This approach could help fulfil the ideas of a Green Arc across the District, which is something we and your Council have been supporting over many years.
10. We welcome the fact that SANGS form part of the overall G&BIS package as stated clearly in paragraph (para) 1.20. Earlier, in para 1.3, we consider that this point, that SANGS should not be considered in isolation, needs to be similarly emphasised. However, having made that point, it is vital that SANGs do not become obscured by the provision of “multi-functional” green spaces (the integration discussed at para 1.25) as SANGS have a very specific, measurable function within GI. SANGS must be a ‘ring-fenced’ and clearly identifiable element of this holistic approach, the effectiveness of which, in avoiding adverse impacts on the EFSAC, can be clearly monitored and measured by the competent authority.

11. The provision of the appropriate quantity and quality of SANGS must be the early priority of the G&BIS. We welcome the Council's acceptance of the quantum of SANGS required of 8ha per 1000 residents (para 1.6, Appendix 3) but for a SANGS network to be effective in providing an alternative attraction, to that provided by Epping Forest, there will need to be large, additional semi-natural open spaces (>30ha) amongst any network.

A SANGS Strategy

Hierarchy of planned provision

12. The City Corporation in its evidence at the Examination-in-Public (EiP) (representations on Matters 1 & 4 and Matter 16) and in its letters of 24th July 2018, 14th September 2018 and 28th November 2019 has reiterated its concern that the mitigation hierarchy, for the protection of European sites under the Habitat Regulations 2017 (as amended), must begin with **avoidance** measures rather than relying on on-site mitigation (SAMMS).
13. It is, therefore, a matter of concern to the City Corporation that in the context-setting paragraphs 1.27 to 1.30 a hierarchy of SANGS delivery within a coherent SANGS Strategy is not set out. This concern is reinforced by the SANGS guidance in Appendix 3 which, although covering much ground around the characteristics of different types of SANGS, does not make a clear commitment to such a strategy.
14. For SANGS funding and delivery the current draft of the G&BIS seems, instead, to be reliant on four masterplan developments. In the context of other SANGS Strategies for European sites, such as for the Thames Basin Heaths or the Dorset Heathlands, these would be described as "bespoke" SANGS, designed around specific private developments. They should form only part of any network. In addition, we have significant concern that even these masterplan sites, apart from Latton Priory, do not seem to have room to accommodate the size and quality of SANGS required to provide effective avoidance measures for EFSAC.

Strategic SANGS

15. In a SANGS Strategy for EFSAC there needs to be, in our view, the provision of a network of different SANGS that provides a range of visitor experience and recreation opportunities. To rely on the four masterplan locations (as set out in of the G&BIS Appendix 2) feels very much like all the eggs are in one basket. We would like to see strategic SANGS that serve multiple, scattered and smaller housing developments. Paragraph 1.15 of Appendix 3 of the G&BIS seems to recognise this requirement but does not go on to set out how this might be achieved. There is also the need, in our view, to anticipate a likely regional requirement for SANGS (see below), which may need to be considered outside the G&BIS but which should form part of a SANGS strategy through the Duty-to-Co-operate.

16. Of the housing within the current recreational Zone of Influence (Zoi) of 6.2km, around 2,500 homes are planned outside the current master-planned areas (not including any windfall sites) and yet these developments are not being required to contribute towards the provision of SANGS. Furthermore, there is not a mechanism for the provision of SANGS for such developers and therefore it is not clear how these developments will be able to come forward and be compliant with the Habitats Regulations. For wider growth away from the large sites, strategic SANGs will be necessary. These would be expected to be managed by ownership or by agreement (with commuted sums) by the local authority as competent authority or by other parties, provided a legal agreement for in-perpetuity management is in place. Such provision would allow the Council as competent authority to respond to changing pressures and feedback from monitoring of the visitor patterns and behaviours across the District.

Third-party SANGS – existing greenspaces

17. It is also likely, given the land ownership distribution, that there will also need to be clearly identified existing 3rd party greenspace sites or “buffering” sites close to the Forest, like Copped Hall south and Warlies Park. There is nothing in the current G&BIS draft that examines how existing greenspaces could contribute to the requirement for 8ha per 1000 housing units that is proposed as the correct measure of SANGS provision in the document. If such existing greenspaces are to be included in the SANGS network, clear evidence would need to be provided to show a meaningful contribution to the uplift of capacity equivalent to the 8ha per 1000 residents required by a SANGS Strategy. In addition, and as importantly, the protection of the existing heritage and wildlife interests of these sites would have to be clearly demonstrated to ensure net gain. To do this a clear framework of delivery of SANGS across the District and the wider region is required (see regional coordination section below).

SANGS tariff

18. The corollary to the above hierarchical or network approach to SANGS is that these sites need to be funded through a mechanism that allows for provision across the District in the most appropriate and effective locations and allows for in-perpetuity support for the management of the sites. Funding could be achieved through collection of a tariff or CIL contribution, as a fully-functioning, developing network of SANGs cannot be tied to a single development. This is a key issue that we have raised repeatedly over the last two years since the Regulation 19 consultation. However, the current draft of the G&BIS remains unclear about how GI enhancements and SANGS provision outside the masterplan areas will be funded. Paragraph 1.4 of Appendix 4, for example, skirts the subject and avoids mention of a tariff but offers no effective alternative mechanism.

Management in-perpetuity

19. In addition to tariff monies there needs to be clear guidance on how SANGS will be managed in-perpetuity and specific funding mechanisms need to be identified by the G&BIS or a separate SANGS Strategy. Any such mechanisms and management need to fit closely with the provision of SAMMS and to be flexible enough to adjust in response to changes in housing allocations and any visitor use patterns over time.

Regional coordination – duty -to-cooperate

20. The G&BIS, through its provision of SANGS, will become an important component of the Epping Forest SAC Mitigation Strategy. This Mitigation Strategy remains to be agreed across the relevant London and Essex authorities and will need to address the regional requirement for SANGS. Something of this regional requirement should be recognised in the G&BIS in the form of the supply of Strategic SANGS in the hierarchy of planned provision (see paras 15 and 16 of this letter above). At present, the recognition of this likely regional requirement is missing from the G&BIS and we hope that this can be discussed between the competent local authorities, Essex County Council and the GLA in the near future.

Appendices: the new G&BIS appendices, SANGS and EFSAC Mitigation

Appendix 1

21. Of the projects listed under this Appendix, none, apart from perhaps movement and wayfinding, appear to have any SAC Mitigation potential.

Appendix 2 “Bespoke” Masterplan SANGs – lack of certainty about provision

22. Appendix 2 of the G&BIS sets out to describe the details of the SANGS and GI provision for the four Masterplan sites in turn. However, although there are many good ideas for enhancement of surrounding countryside areas and for improving connectivity between sites contained in this Appendix, there does not seem to be any clear proposal for provision of the SANGS, other than at Latton Priory (part of one of the four masterplan areas).

23. For example, it is not clear if there is sufficient hectareage, unoccupied by housing allocation, within Water Lane, Waltham Abbey, North Weald or Epping South for SANGS to be accommodated. Also, the characteristics of the proposed SANGS are not defined and their locations are not mapped.

Water Lane & Latton Priory

24. We remain concerned about how a semi-natural SANGS of meaningful size and quality can be fitted into the 2,100-house Water Lane (para 1.6 of Appendix 2) masterplan area. This site seems to be over-reliant on existing green space, such as Epping Forest Land at Epping Long Green (paras 1.11

and 1.12) but no discussions have been held with the City Corporation about this and no mechanism for funding enhancements or additional protection for wildlife features have been proposed. The two component woods of Harlow Woods SSSI, pressure on which was highlighted as a significant concern at the Local Plan EiP, also seem to remain vulnerable to increasing demands for recreational space.

25. In the meantime, the CRow Act 2000 open access land at Nazeing Wood Common, to the immediate west of Water Lane and mentioned in passing at para 1.10, seems to provide a significant opportunity for SANGS to be provided by your Council through management agreements with 3rd party land-owners, just as such arrangements have been made elsewhere in the UK. This area of common land also seems to present a great opportunity for biodiversity enhancement as expressed clearly in the G&BIS in Chapter 3 at para 3.54. However, such an approach does not seem to be proposed and no action seems to have been taken, presumably due to the lack of a SANGS Strategy outside of the masterplan areas.
26. It also is somewhat puzzling that in this G&BIS document, that an opportunity has not been taken to map the full extent of the SANGS being offered at Latton Priory. In the Latton Priory consultation document (<https://www.lattonpriory.co.uk/pdf/latton-priory-2020-update.pdf>) it makes clear that additional land is available and the map on page 8 of the developers' consultation document shows this additional land as a key and integrated part of the SANGS offer. These two pieces of land to the south-east and south of the site are not shown on the maps on pages 72 & 74 of the G&BIS (Appendix 2) and yet make up around 40% of the green space on offer. Even for this masterplan area there has been no decision about the extent of SANGS.

North Weald

27. For North Weald there is no clear indication (paras 2.6 and 2.27) of what the SANGS offer might look like for this 1,050-house development. There seems only to be an aspiration to create a SANGS alongside Merlin Way, which would presumably incorporate the existing green space of the flood alleviation scheme, but no map of its likely extent is provided.
28. There is also in paras 2.2 – 2.6 a clear desire expressed to increase the visits to the semi-natural and other important woodlands to the south of the site. As para 2.4 states, these sites would need careful management to protect their current wildlife interests but in the absence of a SANGS tariff it is not clear how such work would be paid for nor how 3rd party landowners could be engaged. Of concern to the City Corporation, however, is the lack of acknowledgement of the likely increased pressure on Epping Forest SSSI at The Lower Forest.

29. Although The Lower Forest lies on the other side of the M11, the main road to Epping passes underneath the motorway and would connect the new residents of North Weald with this existing large open space, only 1.5km to 2km from their homes. On heavy boulder-clay soils, similar to those at Hatfield Forest National Nature Reserve (Uttlesford District), and with a very limited infrastructure this site could suffer increased impacts, including loss of ride-side vegetation and soil loss along similar lines to the damage recorded at Hatfield Forest since its increased local residential population at Takeley in Uttlesford.

Waltham Abbey

30. Similar to North Weald this site seems to have little detail of the location and the extent of the SANGS proposed for the masterplan area. Enhancements suggested for nearby existing habitats (para 3.20) are very welcome, particularly given the ecological importance of the Cobbins Brook valley and catchment, but sources of funding are unclear as already stated above. Forest Land at Aimes Green and its green lanes lies close by as does the City's buffer Land at Warlies Park but no specific proposals are made in relation to the protection or enhancement of these sites, other than some outline ideas in Appendix 4 for Warlies Park.

Epping South

31. The quality of any Epping South SANGS, even if the hectareage could be provided, must be open to considerable doubt given its proximity to the M25 and a major electricity pylons route (para 4.5 of the G&BIS). There is no detail provided of where a SANGS could be provided of sufficient scale and quality. The northern boundaries of the site are proposed for enhancement (para 4.16) and while this is a welcome proposal to enhance edge habitats it does not add up to a SANGS. Even the proposal to use the PROW network to the east of the site (para 4.17) to enhance recreational opportunities inevitably leads towards development in the form of the large M11-M25 Junction. A concern is raised here that, as with North Weald (paras xx – xx), there seems to be an over-reliance on existing PROWs and linear routes (para 4.12) to provide access for recreation rather than additional new recreational spaces that would provide SANGS, which would need to be achieved by negotiation of agreements with neighbouring private land-holders or through proposed land purchase.

32. The more attractive PROW route for any Epping South development would seem to be south of the site and the bridge across the M25 motorway. This is referred to a number of times in relation to it as a route to the EFSAC. While we welcome the recognition in para 4.15 of the problems that might arise by this route directing additional recreational pressure onto the EFSAC there is no solution offered, other than enhancement of the eastern PROW network, the problems of which are outlined above. Furthermore, there is no acknowledgement of our concern, made in response to the Regulation 19 consultation and in a representation to the Examination-in-Public (EiP) about

the protection of the City's Buffer Lands at Great Gregories, which are an essential part of the EFSAC Grazing Strategy and, thereby, to the management of the EFSAC's favourable conservation status. The likely very large percentage increase in visitor pressure on this site immediately across the footbridge from the proposed Epping South development would be likely to lead to increased conflicts with the grazing operation and certainly to increased costs in protecting and managing the facilities there.

33. In the current G&BIS it is not clear that how SAC mitigation will be delivered. Ultimately, as a competent authority relying on the SANGs to deliver the mitigation for the growth in your plan, it is fundamental that your strategy provides the confidence that SANGs can be delivered and provide effective mitigation. Given the importance of the SANGs components, there is perhaps merit that this should be much more clearly separated out in the strategy, so that the legal requirements to deliver mitigation are not lost in the more aspirational elements of the strategy.

Appendix 3 SANGS Guidance

34. Some of this guidance sets out important general parameters, including in para 1.2 for example "*it will not be acceptable to simply offer a field nearby for dogs to be exercised*". The guideline in paragraph 1.17 is also welcomed, that additional recreational activities could be to the detriment of wildlife interests on a site of ecological importance, and this is particularly relevant to Appendix 4 and any proposals to enhance existing sites for SANGS purposes (see further comments below).
35. However, in para 1.2 the approach set out concerning the integration of the SANGS into the new built developments is a significantly limiting constraint, one which would probably only work to attract residents from within the new developments. If this were to be the case the SANGS would not fulfil a strategic role. Connectivity with the surrounding landscape, therefore, is most important and although this is highlighted in Appendix 2 in its discussion of the four Masterplan sites, and also referenced in para 1.15 of Appendix 3, the lack of SANGS details and location maps make it difficult to assess whether it would be achievable.
36. Moreover, the connectivity seems aimed at the new residential development itself and allowing its residents to move away from the site rather than attracting others into the Masterplan SANGS. And while making connections to the PRoWs would be positive (para 1.24, Appendix 3), the SANGS need to be large enough in their own right, for dog-walking for example, and narrow paths (para 1.25) would not accommodate off-lead dog-walking or allow dog-walkers to avoid other activities (e.g. cycling).

37. Paragraph 1.3 offers the prospect of a Landscape Framework through a Memorandum of Understanding with the masterplan developers, but it seems intended only for coordination between the four masterplan areas. If this is the case this seems to be unnecessarily limiting, in our view, and there is, instead, every reason to develop this Landscape Framework into a full SANGS Strategy for the District, encompassing all residential developments and linked to a SANGS tariff and commuted sums that can sustain a SANGS network as discussed earlier in this letter.
38. Paragraph 1.4 seems to hold out the possibility that the SANGS may be broadened beyond the masterplan areas, but this opportunistic approach is not a substitute for a planned SANGS Strategy. Our concerns in this regard are somewhat amplified by paragraph 1.5, which seems to be articulating a project-level approach to avoidance and mitigation. It is this project-level approach that we made representations about at the Local Plan EiP last year.
39. Furthermore, this Appendix does not set out guidelines for the timing and phasing of the SANGS provision, which need to be in place ahead of occupancy of the new residential areas. Para 1.9 proposes that an aspirational Landscape Framework should outline indicative but not necessarily quantifiable benefits and the development of such a framework seems to be some way down the planning timeline and it is, therefore, not clear to us where this might leave the Local Plan and its avoidance strategy.
40. Another concern is the focus of SANGs on dog walkers and walkers (para 1.21). We believe there could be wider scope for a range of different SANG types, for example including cycling. Cycling, particularly mountain-biking, is becoming a key issue for the EFSAC. We note that SANGs-type projects as mitigation in Dorset have included dedicated cycling provision.
41. These details of timing, phasing, minimum areas, quality and shape of the network need to be set out in the checklist in para 1.34 of Appendix 3. The first bullet point in para 1.34 seems to suggest that some SANGS sites, as opposed to general green infrastructure sites, might be smaller than 8ha in size. However, sites smaller than this are unlikely to be effective alternatives to the Forest and the quality of a SANGS is about the size of the sites as well as other features.

Appendix 4 Sites for enhancement

42. This Appendix we consider is both incomplete and too narrow in its focus and does not address the need for a SANGS hierarchy or a coherent network, as raised earlier in this letter.
43. Para 1.19 of Appendix 3 sets some context for existing green spaces which might provide SANGS away from masterplan areas, similar to the 3rd-party

SANGS approaches used in the Thames Basin Heaths SANGS network. However, as para 1.20 of Appendix 3 points out, the nature conservation value of each existing area needs to be assessed carefully so that it would not be damaged by an increase in visitor numbers or any associated infrastructure.

44. In paragraph 1.11, for example, it states that the important ecological features of Roding Valley Meadows SSSI would “*not be affected by increased recreational use*”. However, this seems unlikely given the impact on the hay meadow ecology from trampling of grassland flowers, widening pathways, increased fire risk and impact of increased dog-walking on the grazing activity. Similar issues apply to the City Corporation’s buffer land sites that are highlighted in this Appendix. To accommodate enhanced numbers would require careful design and planning following from monitoring of existing visitor use of the sites.
45. The Appendix also, significantly, omits to mention other key areas that elsewhere, in Appendix 2, are highlighted as places where there are likely be direct impacts from the proposed masterplan sites, let alone the other 2,500-plus houses within 6.2 km of the EFSAC. For example, within Epping Forest Land itself The Lower Forest and Epping Long Greens are not highlighted and yet it is clear from Appendix 2 that North Weald and Water Lane/Latton Priory developments, respectively, are likely to have significant impacts on these existing protected sites. Of the City’s Buffer Lands, Great Gregories is also not mentioned and yet, as highlighted already in this letter, this site could well see a very significant increased visitor pressure should any development at Epping South be approved. We therefore believe Appendix 4 requires much more work and further evidence gathering.
46. Biodiversity net gain is a vital measure of success for future greenspace and for the G&BIS, as this document rightly outlines (Chapter 1, paras 1.13 and 1.42). Therefore, the starting point for considering inclusion of any existing site in the SANGS network, must be whether, given its existing visitor numbers and its existing wildlife interests, it could accommodate an uplift the equivalent of 8ha of new open space per 1000 new residents. For example, while the suggestion made for Jessel Green concerns enhancing access for visitors of restricted mobility, this seems unlikely to make a significant contribution, in terms of the protection of the EFSAC, to the additional 8ha SANGS requirement.
47. The issue of funding for such sites is flagged up in para 1.4, but the necessity of a SANGS tariff, currently used widely by many other local authorities protecting sites of international importance, is ignored. The funding and long-term maintenance for the four sites proposed for consideration on page 103 and in para 1.5, including two City Corporation Forest buffer land sites, is not explained. The types of visitor that these might attract and how any such provision would fit with a wider SANGS network is also not explored in any

detail nor how such consultation might be funded. At this stage, therefore, there is considerable uncertainty as to whether such sites could achieve mitigation for the EFSAC and a significant amount of work is required, including consideration of existing functions of the land, engagement with neighbouring owners (e.g. Copped Hall Trust, Warlies Park House) and information-gathering from existing visitors.

General comments on the G&BIS

48. In Chapter 2 of the G&BIS the housing total for the District of 11,400 new homes is highlighted in para 2.3. As highlighted above, the proposed funding for green spaces (including SANGS) for the District seems to be concentrated at the masterplan areas which encompass 5,890, 51% of these residences. The apparent lack of a mechanism for funding provision for the remaining 49% is of profound concern. Increased pressure on existing open spaces outside EFSAC, including ancient woodlands and grasslands (para 2.7) such as parts of Epping Forest including its green lanes and The Lower Forest, as highlighted above, need a clear strategy.

49. Taking land out of intensive agriculture (para 2.25) and making linkages between important sites (para 2.16) are excellent ambitions and we welcome the broad aspirations of this G&BIS. The Vision at 2.41 is excellent but a concern here is that it may be overly complex making it difficult to bring together the number of threads within it, at least at this early stage in the development of a Strategy for the District. Our concern, as expressed earlier is that this might be to the detriment of a focus on some of the immediate priorities including the implementation of a SANGS network. We consider that a separate SANGS Strategy document is required to resolve this issue.

50. In Chapter 3, we would request caution in the development of multifunctionality or certainly in the idea that individual sites should be expected to be multifunctional. Many sites will only have a single or few priority functions or features to protect. It may not be possible to combine different modes of access, such as cycling and horse-riding. The latter activity often seeks out quieter areas away from cycling hubs. Also commuting routes may detract from green spaces leading to a feeling of busy-ness and bustle (para 3.46).

51. Section 3.5 addresses the Water Environment and we consider it to be very light in detail. Water features are a key draw for visitors and much more could be made of the role of water in enhancing spaces for both people and wildlife. We would welcome a commitment to providing more water-side access, for example in the Roding Valley.

52. We note that tourism is not considered within the G&BIS. Given the commitments made within the submission version of the Local Plan for the tourist economy it would seem important to have more within the G&BIS on tourism. For example, the Local Plan highlights the links between tourism and the environment.
53. In relation to habitat protection and wildlife diversity for the District, we do not agree that natural open space only has value IF “safe and attractive access” is provided (para 3.7). Semi-natural habitats have intrinsic value and also provide important parts of the visible landscape (trees and hedges) and soundscape (e.g. songbirds like Skylarks) or support a core of species that can then populate other more accessible spaces to the benefit of visitors to those places.
54. In Chapter 3 (para 3.16), the idea of engagement through art is an important one and art can be used to convey important messages about the value of a site which can then affect the expectations and behaviour of visitors. It can certainly be influential in shaping opinion as well as engaging and adding interest. We suggest that this section should include a wider focus than just public art, that can be very expensive. Wider focus could include art for engagement, events, festivals etc.
55. In regard to Chapter 4 and Implementation, most of the comments above on a SANGS Strategy cover the key issues about which we have concerns with this Chapter. We are not clear about what is conveyed on the maps at page 54. More detail on these maps about how actual SANGS proposal sites would be used to intercept and attract visitors from different residential focal points (including masterplan areas) would have been helpful at this point. The main concern remains, however, related to *Stewardship* (paras 4.20 – 4.22) and the management, development and long-term protection of green infrastructure, especially a network of SANGS. The mechanisms outlined in this section do not provide us with confidence that such stewardship can be achieved, in spite of the excellent ambitions within the document.
56. Appendix 1 seems to have relatively few projects. We would welcome the inclusion of a project to review existing Public Rights of Way and increase the number of routes, linking existing sites and joining up other Rights of Way. This would fit well alongside the first project (Movement and Wayfinding).

Conclusions

57. We welcome the opportunity to comment on the G&BIS and recognise that it contains many positive measures for both people and biodiversity. We applaud its ambition for a holistic approach to greenspace provision.

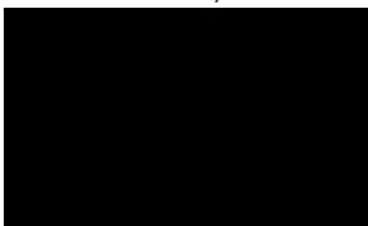
58. However, the G&BIS strategy, as drafted, cannot be relied upon as mitigation for the recreation pressure on Epping Forest SAC as a result of the housing growth in Epping Forest District. Mitigation measures should be effective, reliable, timely, guaranteed to be delivered and as long-term as they need to be to achieve their objectives. Epping Forest District Council needs to be able to demonstrate the deliverability of all of the mitigation on which the Local Plan relies because, if the confidence is misplaced and the mitigation does not materialise when required, permission cannot be given for the development provided for by the plan and alternative strategies will need to be developed.

59. SANGs are an essential part of the mitigation package, and yet it would seem that only a restricted proportion of houses coming forward would be linked to any kind of SANGS provision. Even for those houses, the G&BIS, as yet, does not provide sufficient confidence that mitigation has been secured or would be effective. As a result, there seems to be no clear hectarage of SANGS anticipated, no list of SANGS site options and a SANGS tariff requirement is not set out as we believe it should be in this document.

60. For the District, to make progress on the above issues, we consider that there is a need to divorce the SANGS strategy from the more aspirational G&BIS and that a separate, comprehensive, clear and effective SANGS strategy is necessary. This needs to set out the SANGS that will be delivered by developers and also a range of other infrastructure and greenspace provision that would provide for mitigation for smaller sites across a wide area. Detail of how existing sites might contribute to this, how mitigation will be funded and what requirements would be placed on developers need to be clearly set out. The City of London, as Conservators of Epping Forest, remains ready to explore with you how the non-SAC open spaces we manage might contribute to the mitigation required in the District and regionally.

61. More broadly, we remain concerned that there is, as yet, no timetable for the decisions on governance of the SAC Oversight Group which would have an overview of SANGS provision regionally. We believe mitigation will be best delivered if coordinated across local authorities. We see a role for the Greater London Authority in helping facilitate this.

Yours sincerely



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