

APPENDIX 2



COMMENTS by THE CONSERVATORS of EPPING FOREST on the LONDON BOROUGH of REDBRIDGE LOCAL PLAN (Sept 2016)

Policy LP39 Nature Conservation & Biodiversity and paragraph 6.6.2 of Local Plan (also paragraphs 5.3.2. - 5.3.8 of the HRA).

The Conservators in general welcome this policy and the clear intent to protect the Forest SAC (and SSSI). They also would welcome the opportunity to work closely with the Borough to enhance biodiversity and the links between wildlife-rich areas. However, they do not believe that the distinctions being drawn between developments inside and outside the 2km buffer zone are fully justified. The Epping Forest Visitor Survey is cited in the formulation of this 2km Buffer Zone but the data needs closer inspection as the survey was not designed to provide evidence of the effect of household distance on the recreational impacts on the SAC. Further examination of the data may reveal that the respondents who provided post codes may have been drawn disproportionately from a sample closer to the Forest. There is certainly evidence that visits to the Forest are drawn from further afield and a more bespoke survey may be required to provide such a hard-and-fast buffer zone limit. Other publicly accessible protected sites have been shown to draw the majority of their general casual visits (e.g. dog-walking) from up to 5km away. This is likely to depend on the availability of alternative open spaces and other factors but a fixed 2km Buffer may mean that significant impacts that are generated from further afield are not subject to scrutiny and this would not fulfil the requirements of the Habitats Directive/Habitats Regulations 2010 (as amended).

Furthermore, it would seem to The Conservators that the assessment 'of likely significant effects' should be done at a higher level than the project-by-project approach that seems to be taken in the HRA (see 5.2 Screening Table in HRA). There does not seem to be justification, for example, for the conclusion, as in HRA 5.2, that the additional planned 14,665 houses would have no effect on air pollution levels (through the generation of traffic) or recreational impacts on the Forest. Narrowing the assessment to the 692 houses planned for Woodford because they lie within 2km seems premature at least, especially in relation to the generation of traffic. The project-by-project approach seems to avoid a full 'in-combination' assessment of this significant increase in households.

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Finally, although the need for mitigation is recognised in the HRA and is particularly flagged up for the 692 houses in Woodford the HRA does not examine whether such mitigation, such as the favoured SANGs (or ANGst) approach is actually possible with the size of development sites and density of houses proposed. From other studies of protected sites and publicly accessible sites it has been estimated that the average length of a dog walker's daily route is 2.5 km and requires tens of hectares of space (around 30 hectares in some estimates). In the London Borough of Redbridge the number of sites that could meet these types of criteria are limited.

The Conservators would request that the Borough considers other mitigation options more closely, such as how sites are managed/staffed/promoted, and The Conservators would very much welcome involvement in future discussions of options for dealing with 'in combination' impacts of housing and other developments both here and in neighbouring LB Waltham Forest.

Suggested changes

The wording of Policy LP39 1a) could be modified to read:

“(a) Not permitting development which would adversely affect the integrity of Epping Forest SAC, except for reasons of overriding public interest, and only where adequate compensatory measures are provided. As a precautionary approach, developments within 2km of the boundary of the Epping Forest Special Area of Conservation have been limited to reduce the potential risks of recreational and air pollution impacts. However, for both these and other developments further from the SAC, the potential for 'in combination' impacts of the developments will be scrutinised , ensuring a screening assessment under the Habitat Regulations Assessment is carried out where there is evidence of likely significant effects to assess the impact of the developments on the SAC;

trans-boundary impacts on the SAC will be examined and the Council will endeavour to work with its neighbouring authorities, Natural England and The Conservators of Epping Forest to pro-actively avoid or mitigate any such adverse impacts”.

Do you wish to attend to make verbal representations?

We would only consider this helpful if the suggested changes above to LP39 needed further clarification and if the Council did not consider the wording required changing. We would expect Natural England to be the more appropriate body to respond to queries from the Inspector on the Habitats Regulations.