

Comments on EFDC Local Plan Main Modifications: via Epping Town Council Attachment 1

MM47, Policy DM2, Part B3, page 75

- The text of MM47 (as referenced above) includes the words '*Relevant development proposals will be required to make a financial contribution towards the delivery of off-site projects in accordance with the adopted Green Infrastructure Strategy*'.
- However, the Green and Blue Infrastructure Strategy Part 4 (EB159F) has no provision for access to alternative natural space for new development within Epping Town that is not within the South Epping masterplan area. Given many of these new dwellings will be flats without private gardens, it is reasonable to expect these new residents to seek green space beyond Epping town for leisure activities such as walking and dog walking. Part 0 of the Green infrastructure Strategy shows that Epping town is within the 6.2km Zone of Influence, which accounts for 75% of all visits – in fact, the whole of Epping town is within the inner 3.1km Zone of Influence. Unless an off-site SANG accessible from these town centre sites is provided, the new residents will access Epping Forest SAC.
- Currently, only two off-site SANGs are offered within the Green Infrastructure Strategy Part 4 (i.e. not within masterplan site boundaries), one in Roding Valley and another in Theydon Bois – neither of these are suitable off-site SANGs for the proposed town centre developments in Epping, which amount to around 250 new dwellings, all of which will be within the 3.1km inner Zone of Influence.
- **Epping Forest Local Plan MM47, Policy DM 2, Part B3** needs to include specific reference to a large, high quality developer-funded, off-site SANG within easy reach of Epping town (ideally within 2-3km of the town, similar to the distance to Epping Forest SAC), to divert new residents away from Epping Forest SAC. Without provision of such an off-site SANG, EFDC cannot state that the proposed town centre developments in Epping town will not have an adverse effect on the integrity of Epping Forest SAC.
- The **Green Infrastructure Strategy (Part 4)** needs to be amended to provide details of a suitable off-site SANG to mitigate the impact on Epping Forest SAC of the new residential developments within Epping town that are not within the South Epping masterplan area.
- **Epping Forest Local Plan MM47, Policy DM2, Part B3, page 75** needs to be amended to make clear what the criteria are for 'relevant development' with respect to the provision of an off-site SANG, to include all developments within the Zone of Influence, not just those immediately adjacent to Epping Forest SAC.

EB159F (Green Infrastructure Strategy Part 4)

- The quality of an off-site SANG will determine its success as an alternative destination to Epping Forest SAC. The Dorset Heathlands Planning Framework 2020-2025 (<https://moderngov.dorsetcouncil.gov.uk/documents/s18336/Dorset%20Heathlands%20Appendix%201.pdf>) includes 'Appendix D: Guidelines for the establishment of Suitable Alternative Natural Greenspace (SANG) Quality Standards' (see page 29) for the Dorset Heaths SAC and SPA. The Dorset Heaths SAC and SPA suffer from similar issues of recreational pressure/disturbance to wildlife as Epping Forest SAC. The Quality Standards document makes clear that:
 - *SANGs must be perceived as natural spaces without intrusive artificial structures, except in the immediate vicinity of car parks. Visually-sensitive way-markers and some benches are acceptable.*

- *SANGs must aim to provide a variety of habitats for visitors to experience (e.g. some of woodland, scrub, grassland, heathland, wetland, open water).* [author's underlining]
- *Access within the SANGs must be largely unrestricted with plenty of space provided where it is possible for dogs to exercise freely and safely off lead, but under control so as not to deter others.*
- *SANGs must be free from unpleasant visual, auditory or olfactory intrusions (e.g. derelict buildings, intrusive adjoining buildings, dumped materials, loud intermittent or continuous noise from traffic, industry, sewage treatment works, waste disposal facilities).*
- **EB159F (Green Infrastructure Strategy Part 4)** should be amended to include specific, measurable detail on the quality of SANGs to be provided, both within masterplan areas and off-site, for example a tick-list of SANG quality characteristics (see <https://modern.gov.dorsetcouncil.gov.uk/documents/s18336/Dorset%20Heathlands%20Appendix%201.pdf>, see page 30) to ensure that the SANGs are of sufficient high quality that they fulfil their function of diverting recreational visits away from Epping Forest SAC.

EB159E (Green Infrastructure Strategy Part 3)

- The provision of a SANG within the South Epping masterplan area is welcomed, and the elongated shape along the M25 provides opportunities for a 2-3km 'circular' walk.
- The Green Infrastructure Strategy Part 3 needs to make clear that the paths linking the east and west parts of the SANG with the proposed enhanced access to the existing footbridge over the TFL underground line are an extension to the SANG – designed to be naturalistic/green corridors through the housing developments. This should include suitably naturalistic 'all weather' paths for walkers and cyclists, and may for example include the planting of a line of native trees/hedgerow and wild flower borders – the aim is to coax residents to cross the TFL underground line and explore the remainder of the SANG, thereby ensuring that residents make full use of the whole SANG site.
- The requirements for the South Epping SANG need to make clear that it should incorporate provision for 'off lead' dog walking, as that is a prime reason why dog walkers visit Epping Forest SAC.
- The connection of the new SANG into the wider PRoW network is welcomed. However, the underlying clay geology in the area means that PRoW footpaths are often very water-logged and muddy in winter, and difficult to use, especially for young families with pushchairs. As such, when the ground is wet, walkers and dog walkers favour the existing 'all weather' surfaced paths in Epping Forest.
- The specifications for the South Epping SANG should include a suitably naturalistic 'all weather' surfaced path, of at least 2.5-3km in length, such that there is a year-round route available for dog walkers and walkers within the SANG, negating the need for visits to Epping Forest SAC.
- It is not clear how green links from the South Epping masterplan area back into Epping could be implemented, given the current topography and town layout. Further details are needed in the Green Infrastructure Strategy Part 3 for there to be confidence that these ideas are implementable.