

Form A/B1 continued from main form.

MM74 Air Pollution Mitigation Strategy.

The CAZ scheme was announced late 2020 apparently agreed with Natural England and EFDC as a suitable mitigation strategy. However many key councillors stated during the subsequent election period in 2021 that the CAZ is not definite and wouldn't necessarily happen.

All the scientific data and analysis leading up to the APM policies have been limited to a small area but also and very importantly have not been re assessed or considered following the impact of the COVID pandemic

The COVID pandemic dramatically damaged the Epping Forest SAC with an unprecedented level of visitors seeking to access natural green space. The damage from millions of extra people visiting the area will take years to assess and realise. Any further increase will undoubtedly compound that damage.

There is a layer of consideration missing in the APM proposal insofar as the subsequent damage of increased air pollution to scheduled ancient monuments within the immediate zone of influence of air pollution at and around the Wakes Arms roundabout. The areas surrounding these roads is home to some of the oldest living trees in Europe, some considered to have originated from the Anglo-Saxon era. These happen to stand in and around scheduled ancient monuments. Ancient earthworks are extremely delicate and easily affected. The affect of increased air pollution upon the ancient pollards and coppices is impossible to predict and therefore mitigate. If these trees die and fall they will tear up and destroy ancient and protected earthworks of which potentially are far more extensive than previously realised.

The current proposed CAZ scheme seems to be a quick fix alternative to proper mitigation of air pollution in and around the Epping Forest SAC. The real alternative is to significantly reduce traffic through the forest but given the forest boundaries and it's reaches into each local town it is impossible to achieve. Alternatives that would achieve this have not been deemed to the mitigation policy such as opening up the limited M11 junction that would prevent the need for thousands of vehicle journeys through the forest. Currently the only access to the M25 for a large proportion of the district is through the SAC. Alternative routes surely must be preferable option but do not seem to have been explored properly prior to the quick fix option of a charging zone.

I can find no credible data that proves charging schemes to retrospectively mitigate air pollution to ancient trees has any scientific foundation. Some sites that will increase traffic and therefore air pollution within the zone of influence for the SAC have already started to be built meaning the damage is underway and no viable mitigation achievable. The damage to the Epping Forest SAC is already happening with no mitigation, no delivery of alternative transport options, no mechanisms are even in place to deliver the mitigation yet.

The question has to be asked, how can retrospective mitigation work on existing protected ancient trees?

So under this emerging local plan damage is already knowingly being done to Epping Forest SAC meaning the levels of current protection are already being ignored which inspires no confidence that the subsequent mitigation policies would be adhered to and or would be adopted without complete understanding of the implications of them and even if they would actually work.

On that basis I view the air pollution mitigation policy to be unsound and that it would not be legally compliant in the short, medium and long term.

Cllr Paul Morris

Verderer of Epping Forest.

