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Proposed Main Modifications to the Local Plan – EFHT Response

Modifications Planning Policy and Implementation Team
Epping Forest District Council Civic Offices
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Email: MMCons@eppingforest.dcc.gov.uk

Dear Sir/Madam

Our response to the Proposed Main Modifications to the Local Plan

Epping Forest Heritage Trust is a charity working to preserve Epping Forest and increase people's knowledge, understanding and engagement with the Forest. Our members (nearing 1,000) largely live in the various communities throughout the Epping Forest area. A significant number live in Epping Forest District. The Trust has come from the recent merger of the Friends of Epping Forest formed in 1969 and the Epping Forest Centenary Trust begun in 1978, evidence of our long history of commitment to the Forest and to working with and for the Forest and its communities. We are also a stakeholder member of the Epping Forest Consultative Committee, managed by the City of London Corporation.

We welcome the production of the Main Modifications to the Epping Forest District Local Plan. We have focused our comments on the key proposals impacting on Epping Forest.

Overall, the Main Modifications are broadly in line with the requested changes made by the Conservators at the Examination-in-Public and in the Corporation's subsequent negotiations. As a result, we support the Main Modifications on the whole, but support the Conservators' views that further resolution should be sought outside the consultation process and in close liaison with Natural England.

This would enable the precise wording of any further response from the Conservators to be made on the basis of the outcomes of the forthcoming discussions including those of the SAC Oversight Group on the SAMMS costings.

We are pleased the Main Modifications of direct relevance to Epping Forest, have been required by the Planning Inspector, in response to the Conservators' and Natural England's concerns, in relation to the Local Plan Habitats Regulations Assessment (HRA). The HRA has been significantly amended and updated in relation to both air pollution issues and likely recreational impacts on the Forest.

We are pleased to see for example that the policy for the protection and enhancement of Epping Forest (DM2A) has been broadened in scope to include protection for the whole of the Forest, its biodiversity and landscape. In addition, the specific provision under the

Habitats Regulations for the SAC has also been separated. Whilst policy DM2B now also specifies and lists each of the separate mitigation measures (air pollution, SAMMS, SANALS and the need to for these to be secured as the Conservators requested at the EiP.

However there remains the need to address the significant increased housing proposed by the allocations outside the master areas. The SANGS provision in this case is not adequate.

For example, Epping South, although its Place Policy has been amended to be clear about the need for within-development SANGS, the future quality of any SANG next to the M25 remains questionable and therefore uncertain in its effective delivery.

Also, SAMMS- Although the wording of Policy DM2B is now good, the actual delivery of SAMMS and when it will begin is uncertain. The SAC Oversight Group has still not agreed how the costs of SAMMS are to be divided nor to the governance arrangements between local authorities for the delivery of the SAMMS package of works.

Policy DM2C now encompasses the likely significant effects of urbanization (fly tipping, daily access, non-native species introductions etc.) which we welcome. The use about buffering of the Forest with a 400 m zone has been addressed through the requirement of Project -led HRAs for any development that is proposed within 400 m of Epping Forest SAC boundary. This is not a perfect solution as the Project-level HRAs will struggle to address in-combination impacts. This issue is one that that is likely to require close working with EFDC planning officers in the near future to try to set out clear guidelines and enable them to understand the key issues and what would constitute an appropriate assessment of adverse impacts.

MMs 74 and 75 and Policy DM22 on air quality and mitigation of air pollution still leaves concerns about the certainty of delivery and of securing financial contributions for the air pollution mitigation strategy.

The key issue remains as to the certainty of the key components of the Air Pollution Management Strategy. The CAZ is currently being downplayed with both EFDC Officers and Members suggesting that it may not be required as other options may come into being before 2025. However, no deliverable options have yet been proposed by EFDC or Essex County Highways. ad the AMPs Stakeholder proposed for 2021 has not yet been inaugurated.

Yours sincerely

Judith Adams MIEEM
Chair