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I am responding in a personal capacity to the consultation on the MM in respect of threats to the SAC of Epping Forest.

As an environmentalist I have been associated with Epping Forest since 1970, initially in helping to establish the Epping Forest Conservation Centre at High Beach (now the Epping Forest Field Centre) where I taught pupils of varying ages. I was employed as Information Officer for Epping Forest from 1992 retiring in 2005. Since then, I have taught a range of adult courses at the Field Centre and elsewhere and contribute to many local newsletters and retain a keen interest in the status and condition of the Forest.

These are some comments responding to some of the Main Modifications.

Epping Forest is a hugely important ancient Forest but faces the gravest threats since it was first protected by the 1878 Epping Forest Act. These include increased visitor pressure, high levels of pollution in the air and run off from roads and climate change. Its biodiversity is under threat. The surrounding local authorities are planning collectively to build 68,000 housing units. Recent budget cuts mean conservation, habitat improvement and maintenance have not helped.

The woodlands of Epping Forest reducing temperatures and capturing carbon, they provide a vital amenity for people's health and wellbeing as a space to walk, cycle, ride, relax and enjoy.

My main concerns are that the proposals about **Air Quality management not strong enough. Relevant to MM 47 and 79.**

There mention of the Council's adopted Air Pollution Mitigation Strategy for Epping Forest, which at the current time has yet to be written and made public. The Air pollution strategy Mitigation Strategy APMS has yet to see the light of day. The Interim Air Pollution Strategy lists various measures which cannot be implemented, nor does it set out targets for an effective framework or timeline for monitoring air quality. This is of no help to those who wish to see better protection of Epping Forest.

Poor air quality does not respect local authority boundaries. The proposal to extend the London ULEZ for the whole of London currently will stop at the EFDC boundary. There is considerable local concern about the introduction of a Clean Air Zone within EFDC which would in any case require consultation with other bodies. A reliable public network of buses would help to reduce some local vehicle movements.

Until an APMS is developed, agreed and becomes effective, EFDC's duty is to avoid approving any development which has the potential to harm the SAC of Epping Forest. The Local Plan must state clearly that this is the situation.

I appreciate that the key phrase beyond reasonable scientific doubt in respect of damage to the habitats within the SAC of Epping Forest poses a stumbling block but there is mounting evidence that the wellbeing of woodlands right across Europe is severely compromised by poor air quality which has interfered with the effective operation of the wood wide web in supporting healthy tree growth with severe consequences for other living organisms within such habitats.

Domestic heating is one source of pollution but vehicle movements, even those of electric vehicles, add to the toxic mix. Epping Forest lies between busy roads where traffic fumes will fan out across it this must be factored into modelling for air quality too. Monitoring of poor quality should also include Ozone as during hot summer days this is likely to be high and will be damaging the Forest's trees.

It is also important to consider the potential impact of the M25 and M11 sections closest to Epping Forest SAC due to the uplift anticipated linked to the Lower Thames Crossing NSIP in future monitoring.

It is important to recognise that poor air quality also affects all the District's ecological assets (see Policy DM2) which includes local nature reserves, farmland, recreational spaces. It can be worse in residential areas and mitigation measures may be required round medical facilities, schools and residential accommodation for vulnerable residents.

**I also have concerns about the proposed Sites of Alternative Natural Green Space (SANGS).**

The woodlands of Epping Forest are unique as they were established at least 8000 years ago. Their ancient trees and assembling of creatures and fungi found there cannot be replicated, it is these features which may any visit to the Forest a special experience.

The suggested SANGS do not have the same ambience but does course offer a change to pleasurable recreation in a wide open space.

The Woodland Trust site at Theydon Bois is adjacent to the M25, with intrusive traffic noise present and if the wind is in the right direction fumes too. However, it does afford splendid views across parts of London. It is also some distance from settlements with limited footpath access and little car parking space.

The Roding Valley Recreation Ground is already a recreation ground and parts flood when the River Roding is in spate.

More attractive SANGS need to be identified, including opportunities for off road cycling that provide a genuine positive alternative to visiting Epping Forest, where facilities present might encourage people to visit them.

Hope this helps

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If you require any additional information about the wood wide web and pollution I would be happy to supply this