

**Chairman, Epping Forest and Commons Committee**  
Benjamin Murphy CC



Development Control,  
Epping Forest District Council,  
Civic Offices,  
High Street,  
Epping,  
Essex,  
CM16 4BZ

**Telephone** 020 8532 1010

**Email:**

epping.forest@cityoflondon  
.gov.uk

**Date: 18 July 2024**

BY EMAIL

### **Comments of the City of London as the Conservators of Epping Forest to Epping South Strategic Masterplan Framework (SMF) Consultation June-July 2024.**

Epping Forest is owned by the City of London and comprises some 6,000 acres (2,500 hectares). The Epping Forest Act 1878 charged the City as Conservators of Epping Forest, with a duty to conserve the varied vegetation and preserve the Forest's natural aspect. The City of London are also responsible for the management of an additional 1,800 acres (735 hectares) of land strategically acquired to form a development buffer around the Forest known as 'Buffer Land'.

Epping Forest is of international importance for its beech woodland, heathland habitats and for the presence of certain species such as the Stag Beetle. The site is designated as a Special Area of Conservation (SAC) and thus afforded full protection by law under the provisions of the Habitats Regulations (2019, as amended). It is the role of Epping Forest District Council (EFDC), as a competent authority, to ensure that the requirements of the Habitats Regulations are met before deciding whether to authorise any planning application. Where a particular application would be likely to have a significant effect on the SAC's conservation objectives at stage 1 of the Habitat Regulations Assessment (HRA) process (screening stage), an Appropriate Assessment (AA) which should include an integrity test, will be required before that application is authorised.

The proposed Epping South Masterplan development is situated within the 6.2km "Zone of Influence" of the Epping Forest Special Area of Conservation (EFSAC), within which it is considered that building new homes could result in more visits to the EFSAC, resulting in increased recreational pressure.

**City of London** Epping Forest Office  
The Warren, Loughton, Essex IG10 4RW  
**Switchboard** 020 8532 1010  
[www.cityoflondon.gov.uk](http://www.cityoflondon.gov.uk)

**Registered Charity** 232990



Of all the Masterplan sites associated with the EFDC Local Plan 2011-2033, it is without question the development which is likely to have the biggest impact on the EFSAC and wider Forest, as the entirety of the development is within 1.5km of the EFSAC.

### **Air Pollution and Traffic**

The Strategic Masterplan Framework (SMF) refers to the Wider Movement Network (WMN) for the site. The proposal of 450-550 dwellings is likely to see an increase in private car ownership within the area of around 585-715 vehicles (based on average 1.3 per household for non-London residences). This is despite unsubstantiated claims in 'Future Trends' that private car ownership is likely to decrease on the site.

The WMN acknowledges the junction of the B1393 (High Road) and Theydon Road, which was declared an Air Quality Management Area (AQMA) in 2010 in respect of Nitrogen Dioxide levels. The recent decision by Essex Highways to close the through road known as Bell Common from the Theydon Road to the B1393 has further exacerbated the congestion at this junction. The Masterplan has not addressed the increase in vehicular traffic attempting to access the M25 from the development, via the B1393 or Theydon Road/Coppice Row and the A121.

Part 7 of 1.5 Key Issues of the SMF states: *Requirement for off-site improvements to highways and Public Rights of Way to facilitate connectivity and mitigate any impact on existing residents.* However, 6.5 Access and Movement Strategy of the SMF appears to be reliant on promotion of 'modal-shift' to non-motorised transport, rather than any actual proposed mitigation measures to address the issue on already congested road networks.

The Strategic Connections, again refer to connectivity to the M25 without acknowledgment that this connection would be through the SAC. Whilst the Conservators are of course fully supportive of all residents within the EFDC area adopting more sustainable methods of transport, the SMFs failure to address this obvious issue is a serious concern.

The Conservators await further detailed traffic forecasts for this site and how they will comply with the EFDC Local Plan Policy DM22 (Air Quality) and the adopted Air Pollution Mitigation Strategy (APMS) which sets out the measures that the Council will implement during the lifetime of the Plan and the measures to limit the increase in traffic volumes through the EFSAC.

## **Access and Movement Strategy: Potential Off-Site Mitigation**

The Conservators are of the belief that off-site mitigation in the form of safe cycle and walking routes within the existing highway network is essential for this development, especially in relation to pedestrian links for secondary school children attending Epping St. John's. This may lessen the additional daily trips associated with the Masterplan site because of the inevitable vehicular school drop-offs and collections. However, this mitigation is unlikely to be as appealing in the winter and times of adverse weather.

## **Local Community Facilities**

A stark omission from the Masterplan is local grocery/provisions facilities on site. 450-550 dwellings subject to the Officer for National Statistics census data suggests the average household size at 2.36 equating to around 1,062 -1,298 new residents. This would equate to an increase of around 9-10% of the civil parish of Epping's population (based on 2011 census data). The nearest grocery/provisions store to the development is 'Allnutts Stores' on Allnutts Road which is more than 500m from the centre of the Masterplan site and is limited in its product offer due to its relatively small scale. Therefore, there is a highly likely scenario of multiple daily ad hoc trips occurring from the site to the Tesco Superstore in Epping (with associated parking) or other facilities within the main Epping High Street which are in excess of 2km (1.25miles) from the Masterplan area. According to the National Travel Survey 2022 (Gov.uk) 67% of trips between 1-5 miles are made by car. The increase in ad hoc journeys, likely to be created by the omission from the Masterplan is liable to further increase congestion on local roads, especially the B1393/Theydon Road junction. Therefore, the Conservators believe that it is imperative that local grocery provision is required within the Masterplan site.

## **Ecology and Biodiversity**

The ecological objectives of the Masterplan appear to align with national requirements both in terms of Biodiversity Net Gain (BNG) and in the protection of notable habitats and species. However, it has not been made clear in the Masterplan how the Sustainable Alternative Natural Greenspace (SANG) and BNG areas of habitat creation and enhancement will work together whilst ensuring additionality rules are followed. Natural England's consultation on SANGs across England confirms that BNG on SANG is acceptable, but subject to additionality being proven over and above what would have otherwise been required to meet minimum SANG policy requirements. Biodiversity units for BNG derived from the SANG can only be used to achieve no net loss, and therefore at least 10% of the required 110% post-development BNG score must be accounted for elsewhere.

The Conservators welcome and acknowledge through appropriate design and implementation that BNG can complement the purpose of SANGs. However, we would like to see further clarification to ensure that the SANGs primary purpose is to deliver a site for public recreation to ensure it's providing the function to limit further recreational impact on EFSAC, whilst acknowledging limitations and constraints in doing this whilst BNG is also involved. SANG is not an automatic delivery mechanism for BNG and BNG features should not conflict with the principal purpose of the SANG, although the two can exist on the same area. To ensure clarity with regards to BNG on SANG being attributable to habitat creation and or enhancement that proves measurable additionality over and above minimum requirements of the SANG, we'd expect to see the BNG metric calculation tool spreadsheet produced for the SANG to show no net loss and a second spreadsheet to show 10% BNG. This approach will ensure a clear audit trail and allow for simple demonstration of the additional biodiversity unit uplift beyond the minimum SANG requirements.

The Conservators would like further clarification around the long-term management and monitoring of both the SANG and BNG habitats and how these will overlap given the SANG will be funded and managed in perpetuity, whilst the BNG habitats are proposed to be managed and monitored for 30 years. Will there be one Landscape and Ecology Management Plan for the proposals?

From the prepared plans, it is difficult to ascertain how the 'green corridors' between the SANG and the 'New habitats' within the acoustic buffer zone will interact with the other stipulations of the residential design build, especially the external lighting requirements. The Conservators would encourage that no external lighting is placed within the green corridors and that all lighting within the Masterplan site is kept to an absolute minimum and subject to total switch off between the hours of midnight and 5am to minimise disturbance on nocturnal wildlife, save energy and decrease light pollution. We would advise that *Guidance Note 8 Bats and Artificial Lighting 08/23* (Institution of Lighting Professionals and Bat Conservation Trust 2023) is followed with regards to impacts of artificial lighting on nocturnal species.

Whilst the Ecological Feature Requirements contained within buildings and boundaries is commendable, there appears to be no emphasis on retention of these features in perpetuity throughout the lifetime of the developments. Furthermore, on page 44 of the SMF reference to bird and bat boxes in the new buildings contributing to BNG should be corrected. When referring to BNG, the BNG biodiversity metric is a habitat-based approach using habitat as a proxy for biodiversity. Species-based features such as bird and bat boxes are not included within the BNG metric, instead it focuses on the habitats such species may use. The provision of such species features within developments is encouraged, but when referring to BNG it can be misleading, although it is a biodiversity enhancement for this site.

Although Epping Forest SAC has been referenced in the Masterplan, the Site of Special Scientific Interest (SSSI) designated site element of Epping Forest has received little attention in the SMF. The western (EPP.R1) and eastern (EPP.R2) allocations fall within the SSSI Impact Risk Zones and this should be acknowledged in the Masterplan to ensure that the designated features of the SSSI are protected.

The Conservators welcome reference to the watercourse and the design proposals and integration of the proposed eastern allocation, which the watercourse runs through. However, for completeness it would be useful to see it referred to as a main river Brookhouse Brook and its importance from an ecological perspective as part of the masterplan opportunities summary alongside flooding and drainage and landscape and visual disciplines.

### **Trees and Planting**

The tree provision within the interior of the Masterplan Site, is welcomed by the Conservators especially the emphasis on native trees and the current knowledge of the selected species adaptability to climate change. The Conservators would be concerned about EFDC not replacing these trees if they are damaged, die through disease, weather events, or need to be felled due to subsidence or safety fears. The proposal for *Acer rubrum* in the SANG trees species mix is not considered to be required as it is a non-native tree species.

### **SANG Provision**

The proximity of the Masterplan Site to the EFSAC is of a significant concern to the Conservators as an increase in recreational impact is highly likely. The 10.56ha SANGs proposed within the Masterplan comply with Natural England's standard provision rate of 8ha per one thousand new population.

The main purpose of the SANGs is to provide an accessible, safe, and appealing green space for residents to use in favour of the EFSAC. However, the proposed SANGs associated with this Masterplan appear to simply strive to meet the minimum criteria in terms of scale, facilities, and acceptable noise levels as per Natural England's SANG guidelines.

On the western side (EPP.R1) of the Masterplan site the SANG is very narrow, no more than 50m in width, its proximity of the M25 is likely to be a significant factor in the limit of their appeal in comparison to the EFSAC and it is foreseeable that this provision will simply become a sound barrier to the development, rather than the intended public greenspace.

The Conservators are of the firm opinion that the majority of the SANG should be on the western side (EPP.R1) of the Central line in order to have the most mitigation success and that the balance of housing density should be skewed more to the eastern parcel of the Masterplan site.

The Conservators also believe that given the proposed design of the SANG and its proximity to the M25 that it will not act as an appealing alternative to the Forest for existing Epping residents as described in the SMF.

The 'native scrub' when established on the eastern side of the Masterplan site is likely to pose a significant fire risk in the future without careful management and a significant litter trap, further reducing the appeal of the site.

There is no mention of any local byelaws or Public Space Protection Orders (PSPOs) that would manage or mitigate anti-social behaviour that is likely to occur within these spaces, further lessening their appeal and success in perpetuity.

The Conservators believe that a more comprehensive SANG management plan should have been produced with this consultation document, so that the in-perpetuity success of this required provision could be more thoroughly assessed.

The Conservators are also concerned that the development will lead to increased recreational impact upon Forest land known as Sheppard's Meadow and Bell Common, the diverse grass and scrubland of which forms an important habitat, alone and in contribution to the Forest's habitat mosaic. Therefore, it is essential that any on-site and off-site mitigation associated with the Masterplan limits the impact upon this site and seeks to limit any recreational impact and avoid it in the pursuance of active travel initiatives.

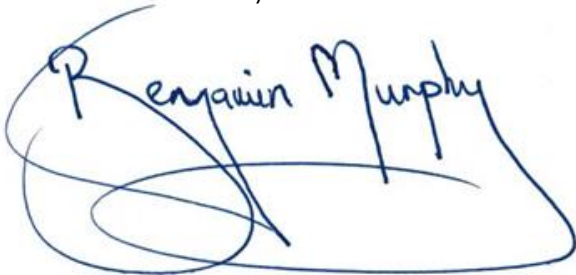
## **Dog provisions**

Around 36% of households in the UK own dogs, with the proposed 450-550 dwellings proposed for the site, there is a realistic expectation that 150 dogs would be resident on the site. The Conservators believe that dedicated dog exercise facilities should be incorporated into the Masterplan design on both the western and eastern side of the scheme in order to reduce eutrophication of the SANGs, and to encourage dog owners to exercise their pets within the curtilage of the Masterplan area, rather than the EFSAC and wider Forest/Buffer Land.

## Conclusion

For the reasons highlighted above, the Conservators of Epping Forest have concerns that the Masterplan proposed is likely to impact the EFSAC, SSSI, wider Forest and Buffer Land in recreational impact from increased visits and air pollution from increased vehicular activity through the SAC. The mitigation measures proposed with the scheme, especially the development's SANGs are unlikely to succeed initially and in perpetuity due to the minimal scale and design.

The Conservators are grateful for the opportunity to comment on this consultation.  
Yours sincerely

A handwritten signature in blue ink that reads "Benjamin Murphy". The signature is written in a cursive style and is enclosed within a large, loopy, hand-drawn oval shape.

**Benjamin Murphy CC**  
**Chairman – Epping Forest and Commons Committee**