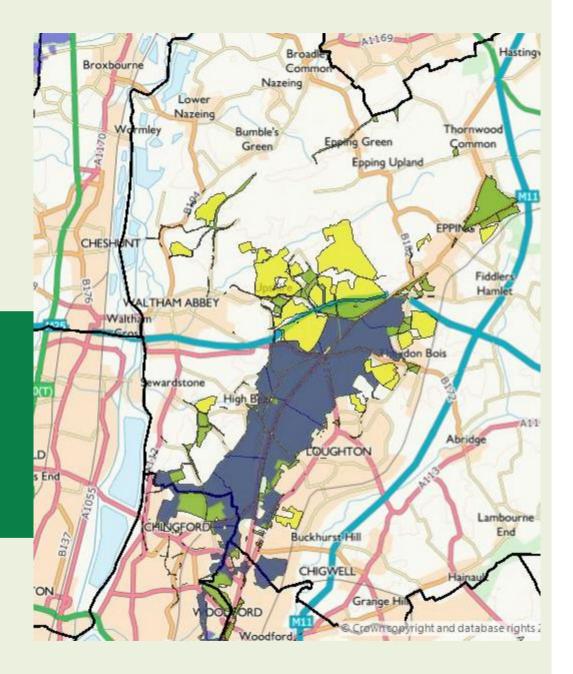




- •Forest area 2,466 ha/9.5 sq miles
- •Special Area of Conservation SAC 1,605 ha
- •5% of EFDC area
- •>40% of EFDC open green space







Epping Forest SAC & Epping Forest District Council

- Favourable Conservation Status of SAC needs to be restored and maintained
 - all public bodies responsible
- Favourable Conservation Status means long-term viability of habitats and species
- Mitigation hierarchy avoidance of harm priority





Habitats Directive& Habitats Regulations 2017& EFDC Local Plan

- The precautionary principle applies
- No adverse effect on protected sites
 - e.g. Epping Forest SAC (EF SAC)
- 'Competent Authorities' need to decide whether adverse effects either alone or 'in combination'

This is one of 14 green spaces managed by the City of London at little cost to the general public.

 Epping Forest District Council is the competent authority for EF SAC under Local Plan



Habitats Directive& Habitats Regulations 2017& EFDC Local Plan

- Habitats Regulations Assessment (HRA) required for Local Plan
- Screen for Likely Significant Effects (LSE)
 'alone or in combination' with other plans
- Mitigation proposals are <u>not</u> relevant to screening process

This is one of 14 green spaces managed by the City of London at little cost to the general public.

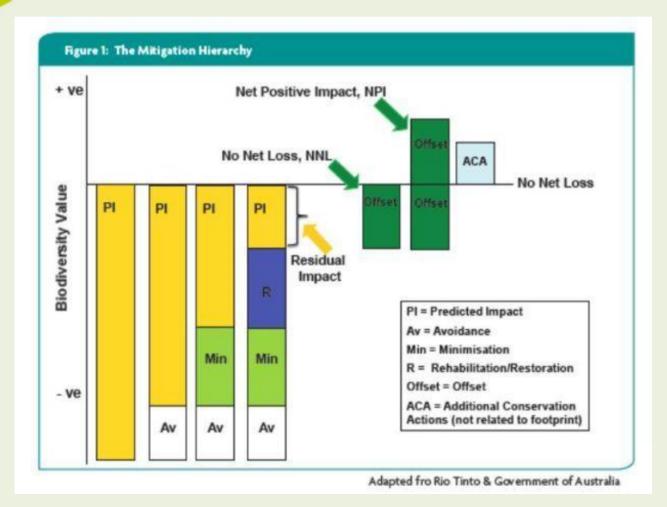
 Appropriate Assessment (AA) required to consider adverse impacts on integrity of site





City Corporation response to Local Plan

Starting from the wrong place





City Corporation response to Local Plan

Detailed response to Local Plan:

- three areas for adverse impacts
 - recreation; urbanisation; air pollution
- Habitats Regulations Assessment (HRA) not adequate
- Appropriate Assessment not undertaken
- No Mitigation Strategy Policy
- Uncertainty about traffic & road impacts



City Corporation's response on Mitigation

Two separate issues for Epping Forest SAC, as stated in the MoU:

- 1. Additional recreation pressure
 - HRA needs updating to reflect 6.2km Zone of Influence (a conservative estimate)
 - mitigation possible strategic and site-specific
 - delegated approval for CoL officers to work on an interim mitigation strategy & tariff
- 2. Additional traffic & adverse air quality impacts
 - HRA and AA not completed
 - effects and impacts unclear or unknown
 - avoidance should be considered first
 - mitigation measures uncertain



Conservators' response on Mitigation - interim

- Mitigation Strategy recreation only
- Project development phase required
 - Ø Sustainable Alternative Natural Greenspace (SANG) provision
 - Ø Location-specific amelioration through Forest site master-planning
 - Ø Forest-wide infrastructure resilience



Conservators' response on Mitigation – long-term

 Improved HRA and AA on air quality impacts and traffic modelling

- Avoidance of air quality impacts
- Increasing environmental resilience
- Enhancing biodiversity
- Continuous monitoring of impacts



