
Hearing Statement for Epping Forest Local Plan Examination

Matters 1,2,3 and 4

Statement of behalf of the Landowner and Redrow Homes Ltd in connection with the
Land North of Abridge Road, Theydon Bois (Site Ref. SR-026C)

Epping Forest District Council Local Plan Examination

Matters and Questions

Matter 1 – Legal Compliance

This hearing statement has been prepared on behalf of the landowner and Redrow Homes Ltd in relation to the site at land north of Abridge Road (Site Ref. SR-026C) and in response to the Matters and Questions that have been raised by the Inspector.

As set out in the guidance note provided by the programme officer, this statement is limited to the issues and questions set out in the Matters, Issues and Questions published by the Planning Inspector. It relates to the representations previously made and new evidence that has arisen since the submission of those representations.

Issue 2: *Is the Plan legally compliant in respect of how it accords with the Local Development Scheme (LDS) and the Statement of Community Involvement (SCI); and has the consultation carried out during its preparation been adequate?*

Q2. *Has the Plan been prepared in accordance with the adopted SCI, 2013, particularly in respect of the following:*
d. Was it reasonable for the Regulation 19 comment period to be held over the Christmas holidays?
f. Does the absence of Appendix B of the Site Selection Report (and potentially other documents) at the Regulation 19 stage contravene the requirements of the SCI? If so, what are the implications of this for the test of legal compliance?

It was not unreasonable for the Regulation 19 consultation period to be held over the Christmas period, however, it would have been appropriate for the Council to extend the consultation period to take account of the Christmas break.

Given that the consultation period was not extended, the consultation undertaken by the Council was not adequate and interested parties were not given adequate time to consider the Pre-Submission Local Plan, particularly given the extent that it had changed since Regulation 18 stage. Moreover, this is compounded by the absence of elements of the evidence base such as the site selection reports and some stakeholder consultation responses (i.e. the Conservators of Epping Forest Response).

The absence of the Site Selection Report at Regulation 19 stage is wholly unacceptable. Epping Forest District Council (EFDC) had made significant changes to the Plan between the Reg 18 and 19 stages which included the omission and inclusion of sites, including Site Ref. 026C. Without the updated Site Selection Report interested parties were unable to take account of the full evidence base when making representations and could not properly make representations as a result, particularly in relation to site specific issues which resulted in sites being included/excluded from this stage of the Plan. Representations were made on the basis of hearsay and comments made by Members at the Full Council meeting of 14th December. On this basis, interested parties were unable to properly comment on the 'soundness' of the Plan, contrary to the adopted SCI (2013) and paragraph 16(c) of the NPPF (2)

Q3. Did the Council's consultation process prior to inviting representations on the Regulation 19 version of the Plan offer interested parties the opportunity for meaningful engagement? In particular:

g. How have the consultation responses made during the preparation of the Plan informed the submitted version, particularly in relation to the desire to protect open spaces and community facilities, and to increase local job and business growth?

h. Has the inclusion and exclusion of specific sites only at the Regulation 19 stage denied some interested parties this opportunity?

i. What action did the Council take to inform interested parties about significant changes to the Plan?

The Council consulted on their Local Plan at various stages as in line with Guidance However, there were significant changes to the Local Plan made between Regulation 18 and 19 stages and at no point did the Council seek to engage with Landowners/Promoters over these changes. This meant that there was no opportunity rectify identified issues over these allocations through engagement with the relevant consultants.

Site Ref. 026C had a draft allocation in the Regulation 18 stage of the Plan for 121 residential dwellings (Policy P8) and the expansion of Theydon Bois was supported in Paragraph 5.140 (part of the text supporting draft Policy P 8: Theydon Bois). This supported the expansion of the settlement to the northeast and recognised that the site provided an opportunity to provide new residential dwellings close to Theydon Bois Underground Station, while minimising potential harm to the Green Belt, landscape and environmental designations around the settlement.

The allocation was removed prior to the Regulation 19 consultation however, despite numerous direct attempts to engage with officers at the Council regarding the allocation we were informed that they would not be engaging on specific sites and as such there was no attempt to engage with the landowner or Redrow to address potential issues that had arisen from the Regulation 18 consultation. In addition, some consultation responses were not available to view (i.e. the Conservators of Epping Forest response) so the landowner / Redrow did not know that concerns had been raised by a key consultation. As such the landowner and Redrow did not foresee the allocation being deleted, which when compounded by the absence of key parts of the evidence base at Regulation 19 stage made it very difficult to address concerns about the allocation. In this regard, the Council failed in its duty to engage with interested parties and has undermined the Local Plan process by not allowing interested parties to properly address matters raised at earlier consultation stages.

In respect of whether consultation responses have informed the Submission version of the Local Plan, it appears that the Council has been selective as to what consultation responses it has considered. For example, the Conservators of Epping Forest raised concerns about a number of allocations and associated impacts on the Epping Forest Special Protection Area; *“At Loughton The Conservators would disagree with the proposed loss of green space at Borders Lane and Jessel Green. The latter site in particular, if lost, would place considerable pressure on the nearby Forest and also would seem to be in contradiction to the green infrastructure policies in the draft Plan. Such a large green space is currently valuable and has considerable potential to be developed for both access and for wildlife.”*

In respect of Theydon Bois they stated; *“the allocation at Theydon Bois is a very large block of housing which would represent over 20% increase in the population of this settlement. This would need a SANG in our view, despite the lower than 400 house threshold.”*

Whilst the allocation at Theydon Bois was deleted following these comments without engagement with the landowner or Redrow, the proposed allocation at Jessel Green and Borders Lane remain at 122 dwellings and 217 homes respectively. Arguably these allocations will have a wider impact on residential amenity through the removal of well used open space which would not be case if Site SR.026C was allocated as this is privately owned with no public access.

There appears to be no sound justification for this, particularly as the landowner and Redrow in the case of Land North of Abridge Road have demonstrated through representations that a SANG can be delivered on site SR.026C to address the concerns of the Conservators. The failure to properly engage with interested parties has resulted in a failure to produce a sound Local Plan.

Matter 2 – Context, Vision & Objectives and Sustainable Development

Issue 2: Is Policy SP1 concerning the presumption in favour of sustainable development necessary and consistent with national policy?

1. Does Policy SP1 add anything to, or seek to depart in any way, from national policy in paragraphs 11-16 of the NPPF? If not, is this policy necessary? If it is necessary, is it consistent with national policy?

It is not necessary to include a policy establishing the Council's commitment to the principles of sustainable development as set out in the NPPF. These principles are firmly established within the NPPF. We would therefore support the deletion of SP1.

Matter 3 – The Quantitative Requirements for Development

Issue 1: Is the housing requirement for the plan period 2011-2033 appropriately defined having regard to the composition of the Housing Market Area (HMA); and the Objectively Assessed Need (OAN) for housing within the HMA?

2. Does the SHMA July 2017 identify the *full* OAN for housing for the HMA and for Epping Forest specifically?

b. Has consideration been given to the high level of housing need in the neighbouring London Boroughs emerging through the London Plan? If not, are the figures justified?

The failure by the Council to consider the unmet requirements of London Boroughs has inappropriately reduced the housing need figure. The unmet housing need in London Boroughs is widely known and the draft London Plan will fall short of its actual housing requirement by circa 10,000 homes. People seeking new homes will inevitably look at Districts closet to London to meet their needs, particularly those with good transport links to central London, such as EFDC. The Council has ignored this when assessing its housing requirement and its migration figures which means that the housing need figure has been grossly underestimated.

Notwithstanding this, the Council is not seeking to meet its own OAN requirement nor is the wider HMA meeting its requirement, which further constrains growth, when considered together with poor delivery rates and affordability issues, the Council has failed to be aspirational as required by the NPPF and the housing need figure is not justified.

This position is emphasised when the housing need figure using the standard methodology is applied which amounts to 923 units per annum, equating to 7,020 more dwellings over the plan period. Whilst it is acknowledged that the Council submitted the Local Plan for examination in advance of the date for this to be applied, it highlights the forthcoming issues with housing in the District and accentuates the need for the District to plan positively to meet this need. This is compounded by the fact that the wider HMA is not meeting its requirement.

3. What is the relevance of the OAN figure of 13,278 for Epping Forest DC referred to in paragraph 6.8 of the Sustainability Appraisal (EB204)?

4. Is it justified for the HMA as a whole, and for Epping Forest DC specifically, to plan for less than the OAN as established by the SHMA 2017, at 51,100 and 11,400 homes respectively?

It is completely unjustified for the Plan not to identify land for less than the OAN nor meet the wider London Plan need or the HMA need Whilst a substantial amount of the District is Green Belt there are areas where it would be appropriate to release land from the Green Belt without resulting in significant harm or undermining the purposes of the Green Belt. In light of this, the Council should plan to meet its full requirement.

a. Has the alternative of delivering the OAN been tested through Sustainability Appraisal? If not, is the SA process deficient?

The SA only considered high levels of growth at the early stages of the Local Plan preparation (2016) and these were discounted very quickly following public consultation rather than on the bases of evidence. This makes the process deficient because stakeholders and interested parties were unable to consider the whole evidence base together with the OAN requirements.

Matter 4 – The Spatial Strategy/Distribution of Development

Issue 2: Beyond the Harlow area, is the distribution of development in the Plan justified having regard to the defined settlement hierarchy?

1. What are the key factors which informed the distribution of development in the Plan beyond the Harlow area?
2. How was the settlement hierarchy set out in Table 5.1 page 114 defined, and is it justified? Has the settlement hierarchy informed the distribution of development and if not, what is its purpose?

Theydon Bois is identified as a large village given the number of local amenities and accessibility to public transport. Given the Green Belt constraints surrounding the settlement and the impact development could have on the Epping Forest SAC, it is considered that this is appropriate. Notwithstanding this, the level of growth identified at Theydon Bois does not align with this designation and places pressure on smaller villages which are less capable of achieving sustainable levels of growth.

Whilst the Green Belt and SAC are factors which mean that creating a town at Theydon Bois might not be appropriate, there remain sustainable sites that could come forward without significant impact on the Green Belt and SAC in line with its large village status.

5. Is the relatively limited growth at Buckhurst Hill and Theydon Bois as Large Villages justified by comparison to that proposed at Nazeing and Thornwood as Small Villages?

Theydon Bois is a sustainable settlement, which has its own centre, containing various facilities including shops, restaurants, a school and a doctors surgery. In addition Theydon Bois London Underground station provides excellent accessibility to London and there is also easy access to the M11 and M25 motorways.

The allocation of 57 residential units in such a sustainable settlement is not a sound approach and conflicts with national planning policy. Epping Forest District includes a number of highly constrained settlements that are not sustainably located, whereas Theydon Bois is an excellent location for residential allocations, as identified above, which will not undermine the overall spatial strategy identified in the Local Plan.

Apart from reference in the Vision to a desire to retain the character and local feel in Theydon Bois, there is no sound reason to reduce the number of residential units from 354 in the Regulation 18 version of the Local Plan.

The allocation of the site SR-026C for housing is considered to represent an excellent opportunity for the sustainable development of up to 121 residential dwellings. This would make best use of the site and optimise development in a sustainable location, adjacent to Theydon Bois Underground Station and adjacent to an existing settlement. In the first instance, this would result in a more natural boundary to the site and the settlement in line with the existing site boundary. It would also enable the delivery of the allocated development site to the north, resulting in good spatial planning from coherent development. There is no sound reason to remove this allocation.

We understand, that the site has not been included in this version of the Plan for reasons relating to its impact of Epping Forest SAC. The Conservators of Epping Forest response (December 2016) identifies that:

The allocation (Regulation 18 Plan) at Theydon Bois is a very large block of housing which would represent over 20% increase in the population of this settlement. This would need a SANG in our view, despite the lower than 400 house threshold.

We have investigated this further (as set out in detail in the accompanying Ecology Representation prepared by SES) which demonstrates that the site will not lead to any adverse impact on the SAC, as a SANG can be provided on land within the same ownership. In addition, there are wider PROW which the site can connect to which would provide further connectivity to existing and future residents, further mitigating this impact. Conversely the site are Jessel Green and Borders Lane will remove existing recreational space which will lead to additional impact on the SAC.

In light of the foregoing to restrict development at Theydon Bois on the basis of concerns about the impact on the SAC which were not shared with the landowner or Redrow and effectively remove their ability to address the concerns undermines the Plan process. Furthermore it results in a significant reduction in housing in a sustainable location which is not justified through the SA.

Enclosure 1: SES Representations



Epping Forest District Council Local Plan Theydon Bois: Ecology Representation

On Behalf of:

Redrow Homes Ltd.

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1. **Introduction and Objective**

- 1.1** This representation demonstrates that the site controlled by Redrow Homes (the site) to the north of Abridge Road, Theydon Bois provides a valid case for inclusion in the Epping Forest District Council (EFDC) Local Plan and will at the same time deliver net benefits to the Epping Forest SAC conservation objectives through the provision of significant areas of accessible greenspace.
- 1.2** The site under the control of Redrow Homes incorporates land previously identified as an emerging allocation in the Draft Local Plan as SR-0026C and a further parcel to the east. This area totals approximately 10.8ha and predominantly comprises of two large grassland fields (Figure 1). The area identified as housing allocation SR-0026C was for approximately 121 dwellings, (Aecom, 2016).



Figure 1: The site incorporating the housing allocation SR-0026C

2. Description of Housing Allocations within Theydon Bois

2.1 There was a range of sites within Theydon Bois considered for allocation under the EFDC Local Plan (2016) with a total allocation of 360 homes. Further details and locations are provided in Table 1 and Figure 2.

Table 1: Proposed Housing Allocations around Theydon Bois

Reference	Name	Area (ha)
SR-0026C	Land to the north of Abridge Road (Thrifths Hall Farm)	10.80
SR-0026B	Land east of Central Line, North of Abridge Road (including Old Foresters Site)	12.95
SR-0070	Land at Forest Drive	0.89
SR-0327B	Land east of Dukes Avenue	5.72
SR-0327A	Theydon Bois Golf Course and Land to East	35.58
SR-0328A	South Area	47.25
SR-0328B	South Area	28.00

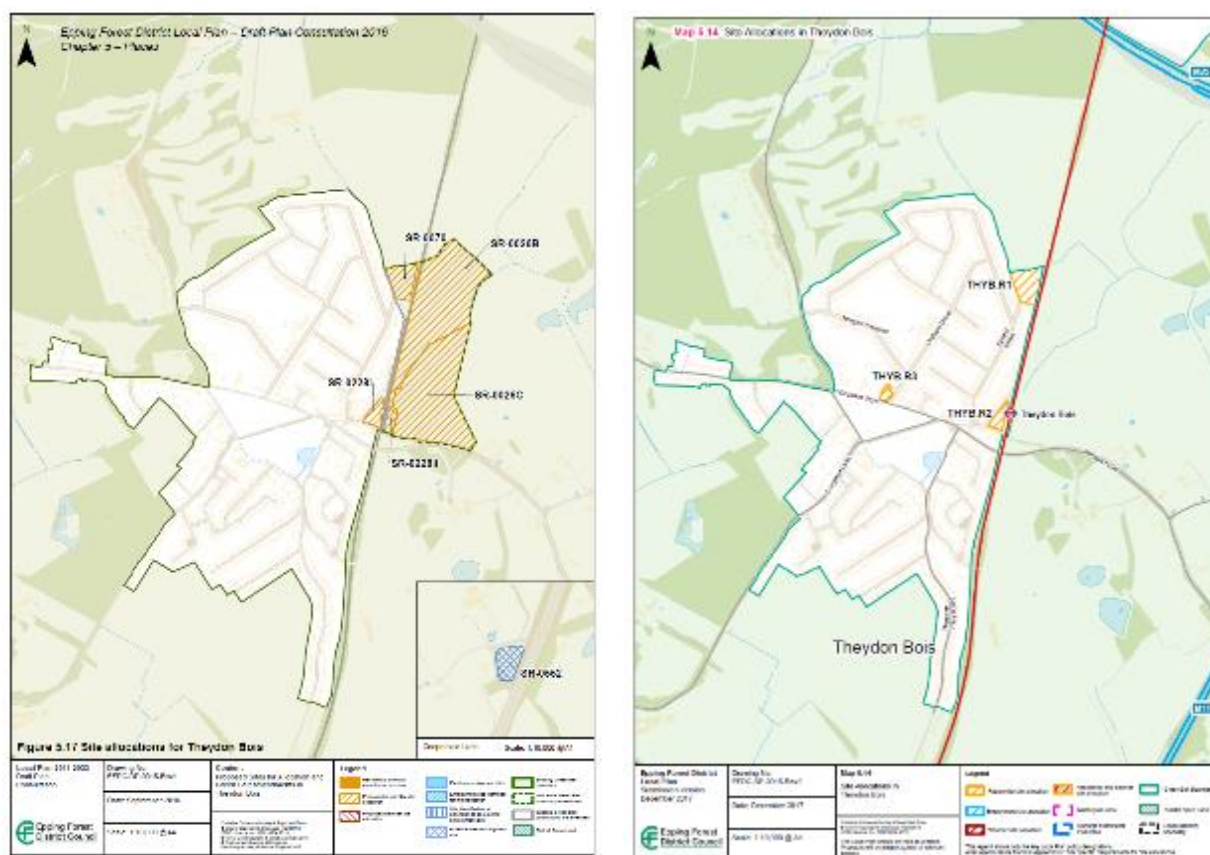


Figure 2: Housing Allocation in Theydon Bois in EFDC Local Plan 2016 and EFDC 2017 (draft for consultation)

2.2 The 2017 EFDC draft Local Plan has removed all but SR-0070 and SR-0228i within Theydon Bois and reduced the allocation to 57 homes. The 2017 Local Plan seeks to allocate the following three residential sites with Policy SP 2 and provided in Figure 2:

- i. THYB.R1 (formerly SR-0070) Land at Forest Drive – approximately 39 homes;
- ii. THYB.R2 (formerly SR-0228i) Theydon Bois London Underground Station car park – approximately 12 homes; and
- iii. THYB.R3 Land at Coppice Row – approximately 6 homes.

2.3 There is no clear justification within the Local Plan, or indeed its evidence base, for the removal of the allocations to the east of Theydon Bois railway, these are: SR-0026B, SR-0026C and SR- 0228ii.

3. Habitat Regulation Assessment (HRA) Screening of EFDC Local Plan Drafts

3.1 The Habitat Regulation Assessment (HRA) Screening of the 2016 EFDC Regulation 18 Local Plan (Aecom, 2016) provided guidance to the required mitigation for such allocations. Section 6.4.10 stated that:

“as an interim measure, it is recommended that Epping Forest District Council should, in line with Draft Policies DM 3 and DM 4, require:

- a) All outline or (if outline permission has already been obtained) detailed housing applications (that have not already received a Resolution to Grant permission) for more than 400 dwellings in Loughton, Epping, Waltham Abbey, Theydon Bois and Chigwell to deliver their own on-site accessible natural greenspace (typically at a rate of 8ha per 1000 population, although this can be judged against quality and accessibility on a case by case basis) and make a financial contribution towards access management of the SAC; and*
- b) All other outline or detailed residential applications (that have not already received a Resolution to Grant permission) in the same settlements to make a financial contribution to access management of the SAC.*

The size of the tariff remains to be determined but should be confirmed prior to submission of the Local Plan to the Secretary of State. This will be an interim tariff until the visitor survey and analysis is completed and the need for any additional mitigation is identified.”

3.2 Draft Policy SP 2: Spatial Development Strategy 2011-2033, including the residential allocation SR-0026C – approximately 121 dwellings, suggests that the site has the potential to result in in-combination impacts relating to recreational pressure upon Epping Forest SAC (Aecom, 2016). The cumulative development in Theydon Bois was 360 units over five sites, including 121 units in SR-0026C, (Aecom, 2016). Hence, these would all require mitigation in the form of Suitable Accessible Natural Green Space (SANGS) to offset likely increases in recreational activity on Epping Forest SAC.

4. Epping Forest Special Area of Conservation

- 4.1** Epping Forest Special Area of Conservation (SAC) (1,630.74ha) is strictly protected under the Conservation of Habitats and Species Regulations (The Habitats Regulations, 2017). Natural England's currently published Site Improvement Plan (SIP) lists a range of pressures on the woodland habitats including air pollution and public access/disturbance. The measures to maintain site integrity (the favourable conservation status of the site features) include "a Nitrogen Action Plan" and in relation to public access/disturbance "the identification of key areas and plan to be implemented".
- 4.2** The City of London Corporation's (CLC) management plan (CLC, 2017) for Epping Forest states that it is trying to determine the carrying capacity of Epping Forest in relation to public disturbance and hence meet its obligations under the Habitats Regulations (2017) which requires it as the competent authority to maintain favourable conservation status of all European designated sites. Currently, the carrying capacity is not defined.
- 4.3** The CLC response to the Local Plan (December 2016):

The allocation at Theydon Bois is a very large block of housing which would represent over 20% increase in the population of this settlement. This would need a SANG in our view, despite the lower than 400 house threshold (see HRA para 6.4.10).

5. Suitable Alternative Natural Green Space (SANGS) Requirements and Features

- 5.1** The current SANGS guidelines were developed for the Thames Basin Heaths Special Protection Area (SPA) and specifically to avoid issues of disturbance especially by dogs that are let off the lead and consequent lowered breeding success of ground-nesting birds that are the designated features of the SPA; the principal species include nightjar and woodlark. This guidance has been more widely adopted for other European protected sites, including SAC where the features are vegetation types.
- 5.2** There is an increasing body of evidence that demonstrates that recreation and in particular dogs not only disturb wildlife especially when off the lead but also alter the vegetation through defaecation, although effects are most marked close to car parks and close to paths. A research project on the recreational impacts on Cannock Chase SAC (White *et al.*, 2012) is relevant to Epping Forest SAC because of the similarity in woodland and acid-grassland vegetation types. This demonstrated some likely significant effects from increased recreational disturbance. Hence it is prudent to adopt the guidance from Natural England (2008) that suggests that an area of SANGS is provided for new residential development at the rate of 8ha/1,000 new residents.
- 5.3** The average household size in EFDC was 2.4 in 2016 (Epping Forest District Local Plan – Draft Plan Consultation 2016, BPG1 - Housing Background Paper).

- 5.4** The SANGS requirement for 121 dwellings is $(121 \times 2.4 \text{ persons/dwelling}) = 290$ people and this equates to **2.32ha of SANGS** based on a rate of 8ha/1,000 increase in the local population as advised by Natural England.
- 5.5** A financial contribution of £50 - £150 per household has been employed in other authorities where some element of SANGS has been agreed. The contribution mitigates either any balance of SANGS required (i.e. to offset a deficiency in SANGS provision) and also the cumulative effects of development.
- 5.6** Notwithstanding that a financial contribution might be acceptable, the draft landscape strategy plan (Figure 3) would provide **c.3.56ha of SANGS** in relation to the site including a proportion of the proposed allocation SR-0026C. This is 50% greater than the SANGS requirement of 2.32ha and will therefore more than offset all recreational pressures arising from the residential development. Within the site there will be requirement for a buffer to the stream and maintain the existing footpath parallel to the stream, and there is scope for 1.2km circular path together with 0.3km central path on either side of the central shelterbelt. There is also the opportunity to connect to/improve the extensive footpath network to the north of the site. A review of the attributes of the site in relation to Natural England's SANGS guidelines is provided in Table 1.

Table 2: Natural England SANGS Checklist Applied to the Site

No.	Criterion	Remarks
1	Parking on all sites larger than 4ha (unless the site is intended for use within 400m only)	Not required but may be considered
2	Circular walk of 2.3-2.5km	✓ Circular walk of >1.2km within site and directly connected to circular walks >2.5km on PRoW to the north of site
3	Car parks easily and safely accessible by car and clearly sign posted	Not required but may be considered
4	Access points appropriate for particular visitor use the SANGS is intended to cater for	✓
5	Safe access route on foot from nearest car park and/or footpath	✓
6	Circular walk which starts and finishes at the car park	✓
7	Perceived as safe – no tree and scrub cover along part of walking routes	✓
8	Paths easily used and well maintained but mostly unsurfaced	✓
9	Perceived as semi-natural with little intrusion of artificial structures	✓
10	If larger than 12 ha then a range of habitats should be present	✓ new broadleaved woodland or scattered trees and meadows within greenspaces
11	Access unrestricted – plenty of space for dogs to exercise freely and safely off the lead	✓
12	No unpleasant intrusions (e.g. sewage treatment smells etc)	✓
13	Clearly sign posted or advertised in some way	✓
14	Leaflets or website advertising their location to potential users (distributed to homes and made available at entrance points and car parks)	✓
15	Can dog owners take dogs from the car park to the SANG safely off the lead	✓
16	Gently undulating topography	✓

No.	Criterion	Remarks
17	Access points with signage outlining the layout of the SANGS and routes available to visitors	✓
18	Naturalistic space with areas of open (non-wooded) countryside and areas of dense and scattered trees and shrubs. Provision of open water is desirable	✓
19	Focal point such as a view point or monument within the SANGS	To be considered

5.7 In addition, the area to the north of the site is well served by public rights of way (PRoW) and includes two local wildlife sites (LWS) (Figure 4). The site perimeter path will connect north over the stream (PRoW 208_04) and also east onto the adjoining land (PRoW 208_05), which with PRoW 209_14 and 209_27, forms a much longer circular route with access beyond the M25 via the underpass towards Coopersale Hall Farm and the southern edge of Epping.

5.8 The presence of the LWS demonstrates that no further development is feasible or likely under local planning policy. There is scope for biodiversity enhancement of the LWS and adjacent land and that this area also provides a valuable local SANGS for the use of Theydon Bois residents. This may even form the basis for the establishment of some form of local nature reserve or country park. The proposed development of SR-0026C could facilitate this wider SANGS development.



Figure 3: Landscape Strategy Plan for the Site

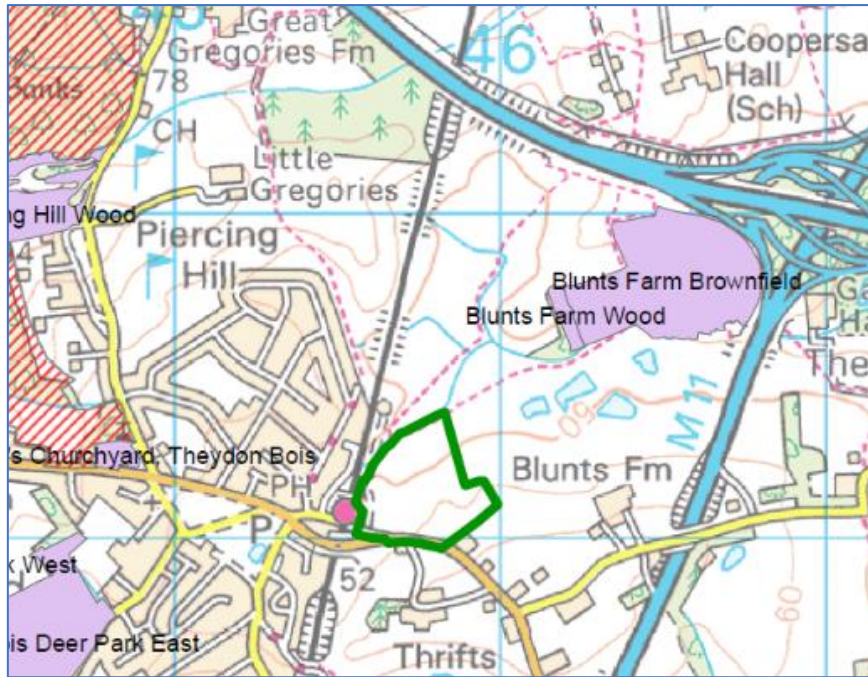


Figure 4: Wider Site SANGS Plan including Public Rights of Way and Local Wildlife Sites

- 5.9** If a new footpath or other access could be created across the railway line, this would link existing housing to the west of the railway with this new SANGS. This would reduce the requirement for existing residents to visit the SAC for recreation, especially routine dog walking. Such a scheme could provide a net benefit to the conservation of Epping Forest SAC and meets the requirement to deliver a local SANGS strategy.

6. Comparison of other allocations

- 6.1** AECOM (2017) noted that two site allocations, SR-0361 (LOU.R5) (Jessel Green) and SR-0478B (CHIG.R6) (Limes Farm), both within 3km of Epping Forest SAC could result in the loss of areas of existing green infrastructure that are used for recreational activities. In other words, they are current SANGS. As such the presence of these green spaces is likely to divert a level of recreational activity away from Epping Forest, therefore the loss of these sites, could result in an increase in recreational pressure upon the Forest, which is then compounded by the provision of an increase in net new dwellings.
- 6.2** AECOM (2017) identified 10 sites within 400m of the SAC boundary (Table 3) and stated that the City of London Corporation has identified that effects from urbanisation is a problem within the Forest. A 400m boundary was incorporated as a buffer distance and is based on Natural England's 'Delivery Plan' for the Thames Basin Heaths SPA, which concluded that adverse effects of any development located within 400m of the SPA boundary could not be mitigated. This has become more widely adopted in relation to all European designated sites and especially in relation to urbanisation effects. THYB.R3 Land at Coppice Row (identified

for approximately 6 homes) is one of the 10 sites within 400m of the SAC. The City of London Corporation identified that effects from urbanisation is a problem within the Forest. For example, fly-tipping and litter costs the Corporation approximately £250,000 per a year to address. This has a direct impact on their available budget and thus ability to sustainably manage and enhance the Forest's environment, including the SACs special features. As such, urbanisation and recreational pressure are inter-linked. Given this and the presence of sites within 400m of the SAC this impact cannot be dismissed. Consequently, sites more than 400m but within 4km of the SAC are considered preferable locations.

Table 3: Allocations within 400m of Epping Forest SAC (Aecom, 2017)

Reference	Name	Approximate Allocation
EPP.R1 (West)	Land South of Epping (West)*	450
EPF/0055/17 (LOU.R17)	Land to the rear of High Road	12
EPF/0719/17 (LOU.R18)	Land at High Beech Road	8
SR-0527 (LOU.R6)	Royal Oak public house	10
SR-0565-N (LOU.R7)	Loughton Library	20
SR-0834 (LOU.R8)	Land west of High Road	29
SR-0176 (BUCK. R1)	Land at Powell Road	31
SR-0225 (BUCK.R2)	Queens Road car park	41
SR-0813 (BUCK.R3)	Stores at Lower Queens Road	15**
SR-1020 (THYB.R3)	Land at Coppice Row	6
Total Allocation		622

*Just outside the 400m allocation but included by Aecom (2017) as it is a large allocation

** also with retail floorspace

7. Delivering Net Biodiversity Gains to Epping Forest SAC by Releasing SR-0026C

7.1 The broad strategy for protection of Epping Forest SAC is set out in Policy DM2:

In pursuit of protecting the vulnerable habitat of Epping Forest the Council seeks to provide alternative spaces and corridors that can relieve the recreational pressure on the Forest. It recognises that additional development in the District is likely to give rise to further visitor pressure on the Forest that needs to be mitigated. This can be achieved by increasing public access to land that is not in the Forest, and altering the character of existing open spaces and the links between open spaces. These linkages are intended to improve access for walkers, dog walkers, cyclists and horse riders, as well as provide space, including additional space for wildlife and plant species.

7.2 Hence, we suggest that the following criteria would meet national and local planning policy and well as they key tests of the Habitats Regulations (2017):

- 1) No allocation of greenspace for housing within 400m of the Epping Forest SAC boundary because of significant urbanisation effects;

- 2) Allocate sites between 400m and 4km of Epping Forest SAC but ensure provision of SANGS that exceed the Natural England area requirements and site attributes;
- 3) Identify additional SANGS that complement the proposed housing allocations within the wider landscape;
- 4) Do not allocate existing urban green spaces within 4km of Epping Forest SAC as these have an important SANGS function;
- 5) Manage new SANGS as new local nature reserves or urban greenspaces.

7.3 The site that incorporates SR-0026C fits these criteria well with a SANGS provision within the site that exceeds the Natural England guidelines, and the opportunity to facilitate the creation of a larger SANGS to the north and east that incorporates existing local wildlife sites. As such, incorporating SR-0026C into the housing allocation at Theydon Bois promotes a win-win strategy for local people and wildlife and a net benefit to the conservation of Epping Forest SAC.

8. References

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