

LBR Local Plan MAIN MODIFICATIONS Consultation

Representor name: **Dr Jeremy Dagley,**

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Representor number: **R00360**

Date: **24th November 2017**



RESPONSE from THE CONSERVATORS of EPPING FOREST to the LONDON BOROUGH of REDBRIDGE LOCAL PLAN 2015-2030 MAIN MODIFICATIONS CONSULTATION (October – November 2017)

Referenced documents:

Ced058 Schedule of Main Modifications to the LBR Local Plan (Oct 2017)

Ced031 Council's Response to Issue 10 (iii)

Policy LP39 Nature Conservation & Biodiversity and paragraph 6.6.2 of Local Plan

HRA - version 4.0, Feb 2017, paragraphs 5.3.2. - 5.3.8

HRA - Addendum (Oct 2017)

Addressing 'in combination' impacts (LP39 – MM68)

In the Conservators of Epping Forest's previous submissions of September 2016 and May 2017 to the London Borough of Redbridge (LBR) Local Plan Consultation, we proposed changes to the wording of Local Plan Policy LP39 (1a). Although the proposed Main Modifications are to be welcomed, as they address some of the issues that were raised by us, the LP39 Policy wording itself remains the same. As such, the key issue of 'in combination' effects (including 'trans-boundary' impacts) does not seem to be incorporated into the Local Plan as required by the Habitat Regulations. Again, we propose a modified wording for this part of the Policy:

Suggested changes to LP39

The wording of Policy LP39 1a) could be modified to read:

“(a) Not permitting development which would adversely affect the integrity of Epping Forest SAC, either alone or in combination (including trans-boundary impacts), except for reasons of overriding public interest, and then only where adequate mitigation and compensatory measures are provided. The potential for impacts, including 'in combination' impacts, from any proposed developments will be scrutinised, ensuring a screening assessment under the Habitat Regulations Assessment is carried out where there is evidence of likely significant effects. Any trans-boundary impacts on the SAC will be examined and the Council will endeavour to work with its neighbouring authorities, Natural England and The Conservators of Epping Forest to pro-actively avoid or mitigate any such adverse impacts”.

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Project-by-project emphasis rather than strategic 'in combination' overview

Also in relation to this above point, it remains of concern to The Conservators that in Paragraph 6.6.2, providing context for Policy LP39, it states, "...*This will allow consideration of effects on the SAC at a project level*". This seems to embed a 'project-by-project' approach in the Plan rather than an 'in combination' overview and, thereby, may avoid addressing the issue of cumulative impacts.

Zonal approach – 2km (MM68)

We have commented on this before in our submissions and, although we understand some of the reasoning provided by the Council, the lengthy justifications of the 2km zone given in its document **ced031** seem to underscore the problem with this arbitrary zonation boundary. The provisos given in ced031 are welcome but do not seem to be fully reflected in the proposed new text under MM68.

In particular, the re-analysed evidence from the 2014 Epping Forest visitor survey suggests a greater distance for zonation would be more appropriate. A new, more targeted visitor survey has just been conducted and funded by five other local authorities (Oct/Nov 2017), including the London Borough of Waltham Forest. Disappointingly, although invited, LBR did not take the opportunity to contribute or participate with this survey, which should provide more accurate estimations of zones of influence (ZOI) for recreational pressures. **Retaining the seemingly 'hard' 2km zoning in the text of the Policy itself would seem to us to undermine a more evidence-based approach and also reduces the impact of the proposed MM68 text additions.**

SANGs & SAMMS

Despite this, we hope that LBR will engage with us, and neighbouring local authorities, in future in understanding recreational impacts on Epping Forest SAC. In this regard, we are encouraged by the proposed Main Modifications to para 6.6.2 given under MM68 on SANGs and SAMM. We look forward to seeing the LBR Planning Obligations SPD, foreshadowed in the new wording proposed for para 6.6.2 under MM68 (3rd additional paragraph).

Air Pollution (MM69)

We welcome the clarifications given in MM69 with the proposed new wording to the text accompanying LP39. Again, we would have liked to have seen changes to the LP39 text itself as this would carry greater weight. There would also be clarity about the approach by the Council to 'in combination' and trans-boundary impacts.

Nature conservation and enhancement of a coherent ecological network of sites (MM67)

We welcome this strengthening of Policy LP39 aimed at protecting and enhancing all sites. Biodiversity and all wildlife are under huge pressure and showing serious declines. It is crucial for all sites, including Epping Forest SSSI, that there is better connectivity between, and improved management of, sites of conservation importance. Losses of wildlife are on such a scale that local authorities need to act with others to prevent further impoverishment of the environment and detrimental consequences for people's well-being.