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London Borough of Waltham Forest  
London Borough of Redbridge  
London Borough of Enfield  
London Borough of Newham  
City of London Conservators of Epping Forest  
Greater London Authority

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## **BY EMAIL ONLY**

Dear All,

### **The provision of Suitable Alternative Natural Greenspace (SANG) in the London Boroughs within the Epping Forest Special Area of Conservation (SAC) recreational pressure Zone of Influence.**

Natural England last wrote to the Epping Forest SAC Oversight Group in March 2021 with details of the progress with regards to working towards a more permanent strategic approach to residential planning applications which have the potential to impact on Epping Forest SAC. This advice applied to all Local Planning Authorities (LPAs) which were identified as partly or wholly within the 6.2km Zone of Influence (Zol).

This letter concerns the work that is ongoing in the London Boroughs, and the spatial uniqueness of the urban environment in which borough-wide SANG Strategies are being developed.

Natural England are pleased with the level of input the LPAs have put into this, and that for each individual LPA progression is being made towards a Habitats Regulations compliant solution. We just wanted to take this opportunity to flag a couple of elements in advance of our upcoming Oversight Group meeting on the 29<sup>th</sup> September.

#### **Requirement for Mitigation**

During the interim position at Epping Forest, we have advised that only developments larger than 100 units within the 6.2km Zol need to provide SANG, as this was being provided on a bespoke basis.

However, as the requirement for SANG becomes embedded through the Local Plan process, we have updated our advice. The Habitats Regulations are definitive when it comes to alone and in combination tests. To reflect these legislation requirements, we advise that **all net increases** of residential development within the 6.2km will require both SAMM and SANG toolbox mitigation. We think we have raised this individually the impacted boroughs, but wanted to take this opportunity to clarify in writing.

The development of borough wide strategies makes it feasible for contributions towards the provision of SANGs from developments of all sizes. We acknowledge there will be differing timescales of the local authorities in terms of bringing these strategies forward, and will continue to work on a bespoke approach to avoidance and mitigation with larger developments in the interim until strategies are secured.

## **SANG Mitigation Standard**

We recognise that in London the urban nature of these boroughs, and the quantum of development proposed, means that it isn't feasible to bring forward SANG at the traditional 8ha per 1000 people standard. The 8ha standard was developed for a specific heathland designated site, and while it has been applicable in other situations, these have all been outside of city environments. There is a need to acknowledge that greenspace usage and provision is different in a dense urban environment. In recognising this, there is scope for mitigation provision to be better suited to the environment in which it is coming forward.

**As a more standardised approach is developed across the London boroughs in the Epping Forest Zone of Influence, we realise that this alternative approach needs to address both the quantum of greenspace improvements required, and the range of improvements that could be considered as avoidance measures.**

This is something we are working on with both the London Borough of Waltham Forest and the London Borough of Redbridge, and given the deviations from traditional SANG provision are also required to review internally within Natural England. We are taking the strategy being developed by Waltham Forest Council for internal review in mid-October, and will update parties after this point. We hope that once an approach has been justified and a methodology agreed, this could then be used as a blueprint for other boroughs as they develop Epping Forest SAC Avoidance and Mitigation Strategies.

We look forward to continuing to work with you all on finalising an approach that allows development to come forward within the Zone of Influence, while ensuring that there are adequate avoidance and mitigation measures in place to avoid further recreational pressure damage being caused to Epping Forest SAC.

For any queries relating to the specific advice in this letter, please contact Isabella Jack at [Isabella.jack@naturalengland.org.uk](mailto:Isabella.jack@naturalengland.org.uk)

Yours sincerely,

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Natural England