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Thank you for the opportunity to comment on the draft Epping Town Neighbourhood Plan. The Epping Forest Heritage Trust (EFHT) is a membership organisation and charity dedicated to preserving and protecting Epping Forest, its flora, fauna, culture and heritage for people to enjoy now, and for generations to come. Our 1,000 plus members largely live in the various communities throughout the Epping Forest area. We have been engaged with, and committed to, the Forest for over 60 years and are a member of the Epping Forest Consultative Group run by the City of London Corporation.

The Forest is a hugely important ancient Forest much of which is both a Site Of Special Scientific Interest (SSSI) and a Special Area of Conservation (SAC) and is a major and irreplaceable recreational greenspace for the residents of Epping and beyond. However, it now faces some of the gravest threats since it was first protected in 1878 and some of its biggest challenges in several generations, with 68,000 homes already planned to be built within a 6.2km recreational zone of interest (Zoi) over the next 15 years, meaning a significant increase in footfall and pollution.

Despite the Forest being a SAC and a SSSI, only 83% of the 41 compartments are considered by Natural England to be in favourable or unfavourable recovering condition, meaning 17% (7 compartments) are in unfavourable condition. Climate change is also causing damage through an increase in Forest fires, high winds and flooding. Levels of pollution are also already too high, especially in the north of the Forest near Epping. As the Plan acknowledges, the housing developments referred to above, will affect the town and, while the South Epping development is the major housing project in the parish, local roads and facilities will be affected by other large developments near Harlow and in North Weald Bassett and Thornwood. These developments will also affect the Forest and the extent of the damage that will be caused by existing planned development is recognised by Natural England and the MHCLG Planning Inspectorate hence the development of a package of mitigation measures to attempt to reduce air pollution from vehicles and the damage and disturbance caused by increased footfall.

We therefore greatly welcome the Town Council's commitment in the draft plan to *"...protect Epping Forest and the green spaces which contribute most to the natural environment, charm and appearance of the area,..."* and to improve accessibility through the creation of greenways etc, to improve sustainable travel more generally (particularly the use of the Underground rail service) and to provide greater connections to public transport to reduce car usage. We were, however, therefore concerned to see Policy 7 of the Plan which seeks to increase car parking and, by implication, car usage:

*"Other opportunities for improving the quality and extent of parking provision shall be explored.... **Opportunities to increase public car parking** in various parts of the Parish, e.g. **as part of the South Epping development** will be considered with regard to sustainable transport aims. **Car parking will be required as part of any redevelopment proposals** – except near the Underground Station (in accordance with Local Plan policy T1 E (iv) which is supportive of reduced or car free development in sustainable locations) to meet Epping Forest District Council adopted standards will be supported."*

Increasing parking on new developments will lead to more vehicles using local roads and more pollution. The Plan is clear that traffic congestion represents a major problem for parish residents as it does for the Forest itself through air pollution. The Foreword to the plan states

that “*The Parish already suffers considerable congestion problems...*” and the section on public transport is clear that “*Relying on cars for the majority of such journeys has consequent unacceptable implications for pollution, congestion, and demand for commuter car parking and all-day parking in residential areas to the detriment of residents.*”.

The Trust is not opposed to car ownership, and we appreciate that some residents will require access to a vehicle for some journeys, but the proximity of the Underground station and of comprehensive town centre facilities should mean that fewer cars and vehicles are necessary and that car parking spaces on new developments can be reduced and calculated at a much lower rate per dwelling than the Essex County Council standard. The Town Council should note that in neighbouring local authority areas, such as Waltham Forest, the policy set out in their Local Plan is for new developments to have no new parking spaces allocated. This approach, combined with resident parking schemes, visitor vouchers and enhanced bus services, would assist the District Council in achieving the reduction in vehicle pollution to which it has committed, both to improve human health and to reduce the damage being done to the Forest.

We would therefore ask that the proposed policy of increasing car parking spaces be re-considered and be taken into account by the planning authorities as they consider the Neighbourhood Plan.

We also note that most of the plans to help increase walking and cycling, which we support, are set to be in the medium term. In order to encourage more people to walk and cycle as soon as possible, to encourage modal shift from cars to walking or cycling, and to deliver early congestion and pollution reduction, we suggest all measures to improve walking and cycling are prioritised in the short term.

We do hope that these plans can be improved to better protect the Forest by reducing pollution and car usage through prioritising walking, cycling and public transport instead of increasing car parking spaces which will only encourage more traffic.

Very best wishes

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