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BY EMAIL ONLY

Dear Nigel,

Further Information – Epping Forest Special Area of Conservation (SAC) – Air Quality

Thank you for your consultation on your Epping Forest Final Report 2024, dated 18th November 2024. This letter provides an update on Natural England's advice following receipt of this further information.

Natural England are committed to continuing to work with you on this matter. Please find below our specific comments upon the document.

This piece of work clearly shows that the background concentrations of air borne pollutants that are likely to impact the integrity of Epping Forest SAC has improved. In some cases drastically improved since your original piece of work to inform your now adopted Local Plan. Background concentrations **alone**, particularly for Nitrogen Oxides are now predominately at or below critical loads. Similarly for Ammonia the situation is looking a lot better. But the background concentrations up to around 150m from the roadside are still above the 1ug/m³ critical levels which relate to the lichen and bryophyte interest features on the SAC. They are closer to and largely below the 3ug/m³ critical level that we would normally expect for the woodland interest on the SAC. Natural England are pleased you are using the lower critical level as there is lichen and bryophyte interest on the site.

The next step in terms of assessment is to then add to these background concentrations the process contribution that your Local Plan will then have. This involves modelling movements of vehicles and determining AADT, and ultimately a calculation of what the concentrations of Nitrogen Oxides and Ammonia will be along the transects you have used for the above piece of work. In simple;

Background Concentration + Process Contribution = Predicted Environmental Concentration (PEC)

It is the PEC we need, before giving you further advice on adverse effect on integrity upon the SAC, and whether mitigation will be required and what that would look like.

We understand a piece of work is underway to identify the new process contribution, including some work you have commissioned involving Automatic Number Plate Recognition (ANPR) tools. We await receipt of this part of the calculation before giving you our final formal advice. Natural England are content with the approach you are taking to the gathering of this evidence. We urge you to consider being consistent in terms of approach with how you completed these calculations for the submission of the Local Plan. We are content that yourselves as competent authority can make decisions regarding this methodology.

As it currently stands, Epping Forest District Council are expected to enact a Clean Air Zone (CAZ) from September 2025, as a requirement of the adopted Local Plan. If Ammonia remains a concern going forward, then a CAZ could work as mitigation toward that. However, there could be other options available to EFDC that it might be worth investigating. These are not limited to;

- Making further changes to the road layout in the vicinity of Epping Forest SAC to control vehicle movements
- Working with local landowners to remove other dominant sources of ammonia pollution. These could be funded through the mitigation pot EFDC is currently collecting. For example;
 - Looking at the farming community around the Forest and improving their slurry management system and livestock provision
 - Looking towards London to see if there are technical improvements that could be made to Anaerobic Digestors or Energy from Waste facilities, to clean the air before it is released into the atmosphere
- Further specific investigations, looking at high level mapping of where the pollution is coming from, and where the lichen communities are most prevalent in the SAC. City of London Corporation will be useful to discuss this with.

We understand there is still a level of uncertainty here. As you are well aware this is a complex matter and Epping Forest SAC has become the vanguard of assessing and dealing with this emerging impact pathway. It is unfortunate that we cannot give you a definitive answer upon the requirement for a CAZ. But once we are in receipt of the further traffic information and modelling to derive the PEC, and then if necessary you have identified some measures to moderate and mitigate that, we will certainly be in position to give you a definitive answer.

Our offer to continue to work with you on addressing this matter stands.

Yours sincerely,

Lotty Coupat
Principal Manager
West Anglia Area Team