

Date: 31 August 2018  
Our ref: 253766  
Your ref: UTT/18/0460/FUL



[planning@uttlesford.gov.uk](mailto:planning@uttlesford.gov.uk)

cc. [REDACTED]

**BY EMAIL ONLY**

Customer Services  
Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

T 0300 060 3900

Dear Ms Denmark

**Planning consultation:** Airfield works comprising two new taxiway links to the existing runway (a Rapid Access Taxiway and a Rapid Exit Taxiway), six additional remote aircraft stands adjacent Yankee taxiway); and three additional aircraft stands (extension of the Echo Apron) to enable combined airfield operations of 274,000 aircraft movements and a throughput of 43 million terminal passengers, in a 12-month calendar period.

**Location:** Stansted Airport, CM24 1QW

Thank you for your re-consultation on the above dated 23 July 2018 which was received by Natural England on the same date, following discussions with your authority and the applicant at the meeting of 10 July 2018. This letter follows previous emailed consultation advice dated 9 July 2018 and 10 May 2018 which sets out outstanding matters relevant to the effects on designated sites.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Case law <sup>1</sup> and guidance<sup>2</sup> has stressed the need for a full set of environmental information to be available for consideration prior to a decision being taken on whether or not to grant planning permission. Annex A of the letter dated 10 May 2018 provides Natural England's advice on the scope of the Habitats Regulations Assessment including Appropriate Assessment for this development.

### **The Wildlife and Countryside Act 1981 (as amended)**

### **The Conservation of Habitats and Species Regulations 2010 (as amended)**

The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires local planning authorities to consult Natural England on "Development in or likely to affect a Site of Special Scientific Interest" (Schedule 4, w). Natural England's comments in relation to this application are provided in the following sections.

### **Sites of Special Scientific Interest (SSSIs) and sites of European or international importance (Special Areas of Conservation)**

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<sup>1</sup> Harrison, J in R. v. Cornwall County Council ex parte Hardy (2001)

<sup>2</sup> Note on Environmental Impact Assessment Directive for Local Planning Authorities Office of the Deputy Prime Minister (April 2004) available from

<http://webarchive.nationalarchives.gov.uk/+/http://www.communities.gov.uk/planningandbuilding/planning/sustainability/environmental/environmentalimpactassessment/noteenvironmental/>

The development site is near to the following designated nature conservation sites:

Hatfield Forest SSSI, NNR, Elsenham Woods SSSI, Quendon Wood SSSI, High Wood Dunmow SSSI and, acting in combination with other plans or projects, may have a likely significantly effect on Epping Forest SAC and an impact on Epping Forest SSSI.

Should the details of this application change, Natural England draws your attention to Section 28(I) of the Wildlife and Countryside Act 1981 (as amended), requiring your authority to re-consult Natural England.

## **1. The Wildlife and Countryside Act 1981 (as amended) - Sites of Special Scientific Interest (SSSIs)**

### **1.1 Hatfield Forest SSSI, National Nature Reserve**

This application is in close proximity to Hatfield Forest Site of Special Scientific Interest (SSSI). Hatfield Forest SSSI is also a National Nature Reserve (NNR) of considerable national significance and is an internationally important example of a Medieval Forest with all elements surviving (Rackham, O, 1989 and <https://www.placeservices.co.uk/projects/hatfield-forest-conservation-management-plan/> ).

Further to our previous consultation advice, Natural England advises the following:

- i) Based on the 2016 baseline within the ES, Hatfield Forest SSSI, NNR is already subject to Nitrogen deposition that exceeds the Critical load for most of the sensitive SSSI habitat features and is over twice the Critical Load for the most sensitive habitat features.
- ii) The roads local to Hatfield Forest SSSI, NNR include major roads (M11 and A120) that have a significant plume of NO<sub>x</sub> associated with them, which when coupled with smaller local roads and airport operations are likely to be significantly contributing to the local Nitrogen deposition. Natural England acknowledges that Hatfield Forest is over 360metres distance from A120 and over 860 metres from M11, which is greater than the DMRB screening criteria of 200m. Whilst, it may be appropriate in some cases to screen in roads that are >200m we accept in this case that the B1256 (which is c50m from Hatfield Forest SSSI) has been assessed in isolation.
- iii) Many of these local roads, including the major roads of (ii), are predicted to be subject to significant increases in traffic flows between 2016 baseline and 2028, and for many roads including key roads linked to required AQ assessments, this has been largely attributed within the ES to the permitted local housing growth (see cumulative developments Chapter 17) and predicted population growth implicit within the TEMPRo traffic flow models. If this is the case, your authority needs to adequately consider this context and the proposed step change of this development within the environmental assessments informing the Local Plan.
- iv) Natural England welcomes the more precautionary reduction that has been factored into the modelling to provide revised model outputs. As expected by Natural England, the 'Do Something' figures for the revised Table A1 are higher than the previously submitted ES figures, and so the proposed 2028 development (Do Something scenario) will be contributing Nitrogen deposition to a higher environmental background level which is regarded to be significantly exceeding the Critical Load for the sensitive SSSI habitat features Therefore the development may be regarded as contributing to prolonging these exceedances of the Critical Load. However, when considering the implications of the additional Nitrogen deposition at this location, the figures in the revised Table A1 indicate that the scale of predicted change is estimated to be unchanged and the % change between DM and DS is estimated as not exceeding 0.63%, which is below the 1% significance threshold generally applied to these type of assessments.
- v) In addition to (iv), Natural England remains concerned that the traffic and AQ modelling involves unseen datasets (eg, TEMPRo) and assumptions, that may not accurately reflect the actual environmental conditions over the mid-longer term that Hatfield Forest SSSI, NNR needs to function

within. We note in row 6.8 of the tabulated Consultee Response Schedule the statement 'As part of the on-going and current S106 commitments, STAL produces all the data on an annual basis in a publically available report published on the website. This commitment will be continued and will include the new monitoring point in Hatfield Forest.' Natural England welcomes this commitment but recognises that this only addresses the commitments of the S106 agreement linked to the current planning permission for up to 35mppa. In recognition that the proposed 35mppa + development (ie, the Do Something scenario) is predicted to increase road traffic and Nitrogen deposition onto Hatfield Forest SSSI & NNR, Natural England advises it would be appropriate to continue this monitoring, as a requirement of any permissions granted, to ensure the modelled environmental conditions for 35mppa to 43mppa are subject to effective 'ground-truth' to validate model predictions. This would be in accordance with the current Stansted Airport Sustainable Development Plan 2015 – 20, (see <https://live-webadmin-media.s3.amazonaws.com/media/3375/stn-environment-sdp.pdf>) noting the expressed strategic objectives to 'actively manage and contain environmental impacts' and 'be active and support partners in the local community', (National Trust and Uttlesford DC could be regarded as such). The SDP also recognises it will need to evolve and be kept under review so that it remains relevant and reflects the evolution and development of Stansted Airport.

## 1.2 Elsenham Woods SSSI

Elsenham Woods SSSI is an ancient coppice with standards Oak-Ash woodland with a reasonably diverse mixture of canopy tree and understorey species and a species-rich ancient woodland ground flora. Whilst additional interest is provided by the ponds, the woodland habitat is the relevant SSSI interest feature that needs to be considered from an air quality perspective.

For the reasons set out in detail in section 1.2 of our letter dated 10 May 2018 Natural England advises the following:

- i) Based on the 2016 baseline within the ES, Elsenham Woods SSSI is already subject to Nitrogen deposition that significantly exceeds the Critical load for its SSSI woodland habitat feature.
- ii) Stansted Airport with all its infrastructure (including roads and car parks etc) is local to Elsenham Woods SSSI and has a significant plume of NO<sub>x</sub> associated with it (see Figure 10.5.1), which when coupled with the Hall Road and accounting for the prevailing wind is very likely to be contributing to this local Nitrogen deposition.
- iii) Some of these local roads, including the internal roads within the Airport, are predicted to be subject to significant increases in traffic flows between 2016 baseline and 2028 that are regarded as Airport-related while others such as Hall Road have been largely attributed within the ES to the permitted local housing growth (see cumulative developments Chapter 17) and predicted population growth implicit within the TEMPRo traffic flow models.
- iv) Natural England welcomes the more precautionary reduction that has been factored into the modelling to provide revised model outputs. As expected by Natural England, the 'Do Something' figures for the revised Table A1 are higher than the previously submitted ES figures, and so the proposed 2028 development (Do Something scenario) will be contributing Nitrogen deposition to a higher environmental background level which is regarded to be significantly exceeding the Critical Load for the sensitive SSSI habitat features and therefore the development may be regarded as contributing to prolonging these exceedances of the Critical Load. However, when considering the implications of the additional Nitrogen deposition at this location, the figures in the revised Table A1 indicate that the scale of predicted change is estimated to be unchanged and the % change between DM and DS is estimated as not exceeding 0.53%, which is below the 1% significance threshold generally applied to these type of assessments.
- v) In addition to (iv), Natural England remains concerned that the traffic and AQ modelling involves unseen datasets (eg, TEMPRo) and assumptions, that may not accurately reflect the real world environmental condition over the mid-longer term that Elsenham Woods SSSI needs to function within. With reference to row 6.8 of the tabulated Consultee Response Schedule there does

not appear to be any commitment within the submissions to monitor the air quality within Elsenham Woods SSSI going forward, and despite reference within the SDP to specific consideration of Elsenham Woods SSSI as part of Air Quality modelling it is not clear to Natural England whether this SSSI is currently included within its existing air quality monitoring programme (see <https://www.stanstedairport.com/community/local-environmental-impacts/air-quality/> ). In recognition that the proposed 35mppa + development (ie, the Do Something scenario) is predicted to increase road traffic and Nitrogen deposition onto Elsenham Woods SSSI, Natural England advises it would be appropriate for Stansted Airport to undertake Air Quality monitoring within Elsenham Woods SSSI as a requirement of any permissions granted, to ensure the modelled environmental conditions for 35mppa to 43mppa are subject to effective 'ground-truthing' to validate model predictions. This would be in accordance with the current Stansted Airport Sustainable Development Plan 2015 – 20, (see <https://live-webadmin-media.s3.amazonaws.com/media/3375/stn-environment-sdp.pdf> ) noting the expressed strategic objectives to 'actively manage and contain environmental impacts' and the need for the SDP to evolve and be kept under review so that it remains relevant and reflects the evolution and development of Stansted Airport.

vi) Elsenham Woods SSSI is already subject to Nitrogen deposition that significantly exceeds the Critical load for its SSSI woodland habitat feature and in recognition that the proposed 35mppa + development (ie, the Do Something scenario) is predicted to increase road traffic and Nitrogen deposition onto Elsenham Woods SSSI, Natural England advises it would be appropriate for Stansted Airport to undertake any necessary measures to reduce NOx outputs and Nitrogen depositions. This would be consistent with the aims and targets of the SDP to 'reduce air pollution' and 'remain within the appropriate air quality limit values' (eg, the Critical Load for Nitrogen deposition within the woodland habitats of the Airport owned Elsenham Woods SSSI). This may be best achieved through a planning condition that requires:

The Elsenham Woods SSSI Management Plan and Stansted Airport Sustainable Development Plan to be updated by 31 May 2019 to include the objective of achieving the agreed Air Quality thresholds for the SSSI woodland habitat by December 2027 and production of a Mitigation Strategy (see ii above) with implementation initiated by December 2020.

### **1.3 Quendon Wood SSSI**

Quendon Wood is an ancient coppice-with-standards woodland, supporting a mosaic of Oak-Hornbeam and Oak Ash woodland communities. It supports a diverse ground flora with notable species associated with a range of soil types. Whilst additional interest is provided by the ponds the woodland habitat including ride flora is the main SSSI interest feature that needs to be considered from an air quality perspective.

Natural England welcomes the inclusion of this SSSI within the initial screening process, recognising it is situated close to the M11 (north of Junction 8) and adjacent to the B1383. Quendon Wood SSSI is >400m from the M11 which is greater than the DMRB distance criteria of 200m. Thus, the B1383 has been assessed in isolation. The predicted percentage change in NOx values between DM and DS for the B1383 is well below the 1% significance threshold that is generally applied to these type of assessments and on this basis, Natural England accepts the conclusions of no significant impact on this SSSI.

### **1.4 High Wood Dunmow SSSI**

High Wood, Dunmow is an ancient woodland, supporting a mosaic of Oak-Hornbeam and Oak Ash woodland communities. It supports a characteristic ground flora associated with a range of soil types. Whilst additional interest is provided by the pond the woodland habitat including ride flora is the main SSSI interest feature that needs to be considered from an air quality perspective.

The predicted percentage change in NOx values between DM and DS for the A120 is well below the 1% significance threshold that is generally applied to these type of assessments and on this basis, Natural England accepts the conclusions of no significant impact on this SSSI.

## 1.5 Epping Forest SSSI

Epping Forest SSSI is one of only a few remaining large-scale examples of wood pasture in lowland Britain and has retained habitats of high nature conservation value including ancient woodland, old grassland, heathland and scattered wetlands including bogs. The semi-natural woodland is particularly extensive forming one of the largest coherent blocks in the country. Most is characterised by groves of veteran and ancient pollards and these exemplify all three of the main wood-pasture types found in Britain: Beech-Oak, Hornbeam-Oak and mixed Oak. The forest plains are also a major feature and contain a number of unimproved acid grasslands and the largest area of heathland mire of any site in Essex. In addition, Epping Forest supports a nationally outstanding assemblage of invertebrates, amphibians, breeding birds, fungi, bryophytes and include nationally significant species for all of these taxonomic groups and lichens.

At EIA scoping stage and during pre-application consultation, Natural England has advised that most of Epping Forest SSSI is also classified as (SAC) Special Area of Conservation and this largely incorporates the mosaic of habitats that support the listed SSSI features. On this basis, our detailed advice is set out within the Epping Forest SAC section of this letter accounting for the provisions of the Habitats Regulations. Additional matters of significance for SSSI features are raised in this section 1.5 below.

Natural England has previously advised that the M11 section between junction 6 and 7 is close to Epping Forest SSSI units 103 and 201, and SSSI unit 106 is within 200m of the M25 so requires further assessment in accordance with DMRB guidance and consideration within the ES. We note that the submitted Letter dated 10 August 2018 assesses SSSI unit 201 but makes no mention of units 103 and 106. We assume that the distance measurements have been taken from the centre line of the carriageways and this distance is regarded to be greater than 200m thus eligible for screening out in strict adherence to the DMRB guidelines (HA 2007).

(a) We note in Table 1 and Table 2 of this letter that the figures provided are not directly comparable.

For Table 1 the difference between DS (5.52) and DM (5.43) is 0.09 which should be equal to the figure in Table 2 for 'Change in deposition rate due to 35+', however it is not. Instead, a figure of 0.08 is provided in Table 2. In addition to this, the % figure in Table 2 for 'Change as a percentage of the minimum critical load of the most sensitive receptor' is 0.84, but based on the figures in Table 1 this arguably should be 0.9%. It is possible the figures provided show discrepancies due to rounding-down, and if so, due to the figures being close to significance thresholds it would be appropriate to revise the Table and associated text within the report to show more exact figures with decimal places.

(b) Additionally, to understand how we should consider the modelled outputs please could the applicant's confirm whether the predicted AADT figure of 5,149 is a conservative estimate (ie, possibly lower than may be expected because it ignores airport related traffic joining/leaving the M11 at Junction 7 – see page 2 Conclusions) or an over-estimate (because airport-related traffic would be expected to be highest near to the airport and the number of vehicles that leave join the M11 at junction 7 has been ignored – see page 3 section A1.1).

Without clarification of points (a) and (b) it is difficult for Natural England to provide definitive advice but for the sake of expedience, if the AADT figure of 5,149 is regarded as a conservative traffic flow estimate and the largest figure of 0.9% change is relevant for assessment purposes, Natural England can advise as follows:

Epping Forest SSSI unit 201 is mainly Oak-Hornbeam woodland with additional interest provided by the ponds. For the purposes of this assessment, the woodland habitat (including ground flora, veteran trees and epiphytes) and wetlands are the main SSSI interest features that need to be considered from an air quality perspective. In this context and at this location, the minimum Critical load threshold for Nitrogen is correctly identified as 10kgN/Ha/Year (see page 2 Table 2). With reference to the points made above, we note that 0.9% is below the 1% threshold of significance but

should be regarded as approaching the level requiring further assessment. Furthermore, this area of Epping Forest is already subject to Nitrogen deposition that significantly exceeds the Critical load for its SSSI woodland and wetland habitat features and this development is likely to contribute to prolonging the exceedances of Nitrogen loading. With this in mind, please could the applicants respond to points (a) and (b) above, and for future reference and validation purposes, include as part of the Technical Note the tabulated estimates for the transect points to show how Nitrogen deposition levels are predicted to 'drop off' with distance from the M11. Notwithstanding this, should the percentage change in Nitrogen deposition values between DM and DS be predicted to be a maximum of 0.9% and therefore below the 1% significance threshold at this location, Natural England is minded to accept the conclusion of no significant impact on the interest features of the SSSI. This does not mean that Natural England can rule out a likely impact on the SSSI features caused by this scale of development-linked Nitrogen deposition, but merely acknowledges that the strict application of current guidelines (eg, DMRB) for SSSI and EIA-linked assessments provide an accepted justification for not regarding the impact as 'significant' and therefore not requiring further assessment or mitigation. Ideally, mindful of sustainability and SSSI targets, this section of M11 adjacent to Epping Forest SSSI unit 201 should be subject to periodic traffic monitoring and linked AQ modelling to verify the predictions to see whether further assessment and remediation is necessary. In light of the context, Natural England does not expect this provision, but for the record would support a solution that included this provision within any Highways-linked obligation.

For completeness, Natural England refers to section 2 below for the assessment of the relevant 'affected' area within SSSI unit 105.

## **2. The Conservation of Habitats and Species Regulations 2010 (as amended) – European sites**

### **2.1 Epping Forest SAC**

The proposed Airport development is not directly connected with, or necessary to, the management of a European site.

In addition to this, our view at pre-application stage was that the plan (either alone and/or in combination with other plans or projects) will have a likely significant effect on the internationally designated features of Epping Forest SAC and therefore will require assessment under the Habitats Regulations.

In our letter of 8 November 2017, we advised that the proposed increase in passenger numbers (ie, from 35mppa to 43mppa) is likely to result in increased road traffic movement to and from Stansted Airport. The Airport links to road and highway networks (eg, M11, M25 and linked A/B roads) that currently take significant traffic flow adjacent to Epping Forest SAC, SSSI. The critical levels and loads of Nitrogen Oxides and Nitrogen deposition for this SSSI and SAC are currently being exceeded and it is recognised that additional road traffic associated with proposed growth and development may exacerbate this situation. Each new application therefore requires detailed assessment to ensure sustainable development solutions are achievable.

The Local Planning Authorities around Epping Forest SAC, SSSI are aware of this issue and seeking to strategically address it through their Local Plans, principally by ensuring compliance with SEA and HRA requirements. The MoUs for the West Essex/Hertfordshire Housing Market Area (HMA) and Highways & Transport Infrastructure include Epping Forest DC, Harlow DC, East Herts DC, Uttlesford DC as well as Essex County Council Highways, Hertfordshire County Council and Highways England.

#### Likely Effect of Stansted Airport 35+ 'Alone' on SAC Features

We note the predicted contributions to NO<sub>x</sub> Critical Levels and Nitrogen deposition Critical Loads from the M25 are well below 1%, so it is reasonable to conclude for SSSI unit 105 that the proposed development 'alone' can avoid a likely significant effect on the SAC features within SSSI unit 105, however with reference to the Wealden case there is still a need to consider whether there is a likely significant effect 'in combination' with other plans and projects.

For SSSI unit 109, noting distance measurements have been taken from the centre line of the M25 carriageways and this distance is greater than 200m, we acknowledge that strict adherence to the DMRB guidelines (HA 2007) indicates that it is acceptable to screen out any further HRA assessment for SSSI unit 109, either 'alone' and/or 'in combination'.

#### Likely Effect of Stansted Airport 35+ on SAC features 'in combination'

Natural England welcomes the detail provided in the Habitats Regulations Assessment to enable further consideration of the 'in combination' effects and advises the following:

Natural England is mindful of the points made in paragraph 3.43 and also advise 'If the background concentration/deposition is currently exceeding the environmental benchmark and the new development contribution will cause an additional small increase then, the decision will have to be made on a case by case basis and on individual circumstances'. For this case, the complexities involved with the likely 'in combination effects' associated with the HMA Local Plans and the highlighted concerns about the ecological sensitivity of Epping Forest SAC (and SSSI) features has required this proposed development to be considered in more detail.

Unfortunately, the revised EFDC traffic assessments and linked Local Plan HRA are not yet available for our consideration. To enable Natural England to meet the consultation timescales for this application we have provided advice based on the information that is available, rather than requesting a further extension to the consultation period to allow for this additional third party 'in combination' information. Natural England notes the reasonable assumption that the M25 carries a wide range of longer distance trips and acknowledges that the local road B1393 has no direct connection for traffic to access the M25 at this assessed location. Natural England notes the predicted AADT increase of 12 for the B1393 that can be attributed to the Stansted Airport 35+ development, which is very small compared with the predicted increases >1000 AADT that have been attributed to the Local Plan growth (available HRA figures). Based on assurances from the applicants that the assessments have adhered to available standard guidelines it is reasonable for us to conclude that the Stansted Airport development will significantly contribute to the M25 traffic levels but not the local B1393, whereas the growth associated with HMA Local Plans will significantly contribute to the local roads and potentially other major roads including the M25. With an absence of locally validated 'in combination' traffic and AQ assessments for the B1393 at this stage, we are minded to accept the use of TEMPro growth for assessment purposes and note for future reference the predicted AADT contributions that would be required to meet 1% NOx threshold.

The Epping Forest Survey Note (Appendix 3 of the document Revision to Annex 1: Information for Epping Forest July 2018) helpfully provides additional detail that supports Natural England's advice in our emailed letter of 9 July 2018. For example, the snapshot SSSI condition assessment of favourable condition status (referred to in section 3.35 of Appendix 3) is dated 2009 and it is likely some of these features (eg, bryophytes) may not achieve favourable condition targets if assessed today. Furthermore, this Survey helpfully confirms that the 'zone of influence' within the SSSI unit 105 is Nitrogen polluted when considering its Lichen Indicator Scores and other notable field signs (eg, signs of stress, elevated insect damage and dominance nitrogen-loving field layer where present). This aligns with our observations and concerns that 'Epping Forest SSSI unit 105 (within SAC) has been subject to Nitrogen deposition above Critical Loads for a prolonged period and this has been identified as a 'SSSI Threat' and an 'SAC IPENS issue' since at least 2009 and this is reducing the capacity for sensitive SAC features and their supporting habitats to maintain or achieve favourable condition and/or favourable conservation status.'

We note the lack of clear trend between % lichen cover and distance from the M25, but also recognise the increase from 'Nitrogen Polluted' to 'Very Nitrogen Polluted' (based on Lichen Indicator Score / Nitrogen Air Quality Index) with increasing proximity to the M25 (ie, comparing c200m with c50m distances from the M25). Overall, the assessment helpfully contributes to Natural England's understanding of how the features of this specific area of the SSSI, SAC are performing at different distances from the M25 and also demonstrates the challenges within the short

timescales of the planning process to obtain definitive proof that elevated NOx and Nitrogen deposition from development will cause a significant and quantifiable impact.

When considering the 'in combination' figures generated by TEMPro for the Stansted 35+ traffic on the M25, Natural England notes the maximum increase in nitrogen deposition into this discrete area of SSSI unit 105 of the SAC is predicted to be 0.02kgN/ha/yr. This is well below the 1% level of the Critical Load for this woodland area of the SAC and the modelled reductions in Nitrogen deposition at increasing distances from the M25 is a reasonable assumption based on general studies. Despite reasonable endeavours by all parties it has not been possible to obtain relevant site-based monitoring of air quality to ground-truth modelled predictions. Additionally, it is not yet clear to Natural England what the likely increase in Nitrogen deposition will be from the B1393 onto this area of the SSSI unit 105 that can be attributed to the increased traffic generated by the HMA Local Plans. It is anticipated that the effect of the forthcoming Local Plans on the local roads and the adjacent SAC areas (including the B1383 and SSSI unit 105) will have to be considered as part of their HRA assessment process.

Based on available and submitted information, Natural England broadly accepts the application of the distance criteria and the 1% significance threshold at this location for this development and generally accepts that the Stansted 35+ can avoid an adverse affect on the integrity of Epping Forest SAC, either alone and in combination with other relevant plans or projects.

This does not mean that Natural England can rule out a likely impact on the SSSI features within SSSI unit 105 caused by this scale of development-linked Nitrogen deposition if it were considered in combination with unexpected levels of growth beyond TEMPro assumptions, but it merely acknowledges that the strict application of current guidelines (eg, DMRB) for SSSI and EIA-linked assessments provide an accepted justification for not regarding the impact as 'significant' and therefore not requiring further assessment or mitigation. Ideally, mindful of sustainability and SSSI targets, this section of M25 adjacent to Epping Forest SSSI unit 105 should be subject to periodic traffic monitoring and linked AQ modelling to verify the predictions to see whether further assessment and remediation is necessary. In light of the context, Natural England does not expect this provision, but for the record would support a solution that included this provision within any Highways-linked obligation.

### **3. Protected species, Local sites, Biodiversity & Landscape enhancements**

Natural England refers you to our advice in our letter dated 10 May 2018 (reference DAS 3592) and any relevant consultation letters about this proposed development with more detailed advice where necessary.

For any queries relating to the specific advice in this letter only please contact Heather Read on [REDACTED] For new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely

Heather Read  
Essex Local Delivery Team