



**Epping Forest  
Heritage Trust**

**28<sup>th</sup> November 2023**

**Planning application - EPF/1195/23** - Coppice Row Farm, Coppice Row, Theydon Bois,  
Epping, CM16 7DS - Proposed detached dwelling.

### **Epping Forest Heritage Trust**

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.

Epping 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), with iron age camps, 1,000 year-old trees and rare wood pasture habitat and species. It now faces the gravest threats that it has seen since it was first protected by the 1878 Epping Forest Act. Climate change, increasing levels of pollution and the acceleration of nearby developments have led to a reduction in the biodiversity of the Forest (flora and fauna). Neighbouring development, including plans to build 68,000 housing units in its vicinity, already threaten its resilience to pollution. Anticipated increased visitor numbers and budget cuts mean conservation, habitat improvement and maintenance are curtailed, and biodiversity is reduced.

At the same time the Forest has the potential to help us tackle the crucial issues of our time: it helps us tackle climate change by reducing temperatures and capturing carbon; it provides a vital amenity for people's health and wellbeing as a space to walk, cycle, ride, relax and enjoy.

It is therefore essential that we protect and preserve the Forest not just for our own current enjoyment, but also for generations to come, and for the sake of the planet.

**That is why we object to this application in principle because:**

- **It represents an inappropriate development within the Green Belt;**
- **It does not meet the "very exceptional circumstances" required to justify the approval of the construction of new buildings within the Green Belt.**

**In addition, the Habitat Regulation Assessment (HRA) is flawed and contains factual inaccuracies and therefore does not allow a proper consideration of the impact of the development upon the SAC.**

The National Planning Policy Framework (NPPF) is clear that construction of new buildings, with exceptions, is inappropriate in the Green Belt.

The construction of a new residential property as proposed does not fall within the description of these exceptions. In particular, given the extent and location of the proposed dwelling, it would not appear to constitute "limited infilling in a village".

On the basis that that the proposal does not represent an exception to the normal prohibition on building on the Green Belt, it is unclear how the development of the proposed single residential property on a greenfield site, very close to a SAC/SSSI, would qualify as "very special circumstances" such as to override the presumptions against developments in the Green Belt as specified in the NPPF.

Moreover, the site is not zoned for development in the Local Authority's adopted Local Plan. The proposal, therefore, represents a "windfall" site and a possible net increase in both footfall and traffic movements over those that were reflected in that Plan and which is likely to have an impact upon the Forest SAC.

The documentation supporting the application does not appear to be comprehensive. The HRA appears to contain information from a different planning application and contains factual inaccuracies in relation to the numbers of dwellings, numbers of occupants and has erroneous references to "...former care home occupants..." in Table 1. As such the HRA is not fit for purpose and does not enable a full and proper assessment of the impact upon the SAC.

There are also a number of other concerns:

- There is no Landscape assessment nor Arboriculture report both of which are vital to enable assessment of a development within 200m of the Forest.
- While some proposals for Biodiversity Net Gain are covered in the Ecological assessment, including the creation of a new hedgerow, these are not quantified to ensure they meet the minimum +10% net gain.
- The HRA and the Ecological assessment appear inadequate given the very close proximity of the SAC and do not provide confidence that the full impact of development has been considered. The results of the Reptile survey are outstanding.
- Given the uncertainty over the conclusions of the HRA, it is unclear whether it is adequately reflects the requirements of the Council's Strategic Assessment Management and Monitoring Strategy or the need to consider mitigation measures as a development within 400m of the SAC.

- The proposal is within 500m of Ancient Woodland and therefore the Forestry Commission may need to be consulted as a non-statutory consultee.
- There is no Sustainability Strategy and it is unclear how the net increase in traffic movements will be offset, for example, through the provision of EV charging points.
- Given the increase in rainwater run-off that would result from the proposal, does the water management strategy reflect the higher rainfall volumes over the higher ground of the Forest (for example, measurements from the Field Centre at High Beach) rather than generic figures?

We believe the above issues are significant and need to be addressed before a decision is taken by the planning authority.

Yours faithfully

Peter Lewis

Chief Executive

Epping Forest Heritage Trust