



**Epping Forest
Heritage Trust**

15th December 2023

Planning application - EPF/2171/22 - Forest Cottage, High Road, Thornwood, Epping, CM16 6LP - Demolition of 3no. old cottages and outbuildings and reprovision of these 3 cottages and 2 additional new cottage units within the same footprint to include associated rear gardens, allotment areas, and carparking.

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 have object to this application because:

- **It represents a net increase in dwellings in the Green Belt contrary to both the National Planning Policy Framework and Local Authority policies and the site is adjacent to the Epping Forest SSSI.**
- **In the absence of a specific Landscape Character assessment report, it is difficult to understand fully how the new development will be screened from what is an open area of the Epping Forest SSSI immediately adjacent to the site. We believe there should be a planning condition, if the proposal is approved, requiring the maintenance of the existing screening and its replacement as necessary in the future.**
- **The supporting documentation appears to focus on loss of habitats from the building of the new cottages but not the loss of most of the central part of the site to new gardens and allotments. Nor is the requirement for Biodiversity Net Gain adequately covered.**

The Trust does not object in principle to a proportionate and sympathetic re-development of the site which maintains the open nature of the Green Belt but objects to the proposal submitted because :

- it represents a net increase in dwellings in the Green Belt and an overdevelopment of the site which is contrary to both National and local planning policies;
- of the greater extent of the footprint and volume of the proposed development;
- re-development of the site is not in the adopted Local Plan;
- the increase in visitor footfall and traffic movements in the Forest's 6.2km Zone of Influence that will result from the development;
- and
- the particular sensitivities of the site given its location immediately next to the Forest SSSI.

In addition to overdevelopment of the site, our other major concern is the potential impact on the visual amenity given the site's location next to an open area of grassland in the Forest SSSI. We note the statement in the Planning Statement that the developer is *seeking* to retain the existing trees and vegetation screening the site. While there are references to the retention of screening in other supporting documentation, there is no overarching Landscape Character assessment that has accompanied similar planning applications enabling a full consideration of the issue. Given the site's position we believe a condition of approval, if approval is given, should be that the existing screening vegetation is

retained and, importantly, is replaced as necessary, with suitable native species, should it be necessary to remove it in the future for whatever reason.

We have a number of other concerns:

- There appears to be limited consideration of the conservation impact so close to the Forest of most of the central part of the site being developed including through the creation of new gardens and allotments (this change in habitats is noted in the HRA), noting however that the creation of allotments in the Green Belt is an allowable exception in the NPPF. We also note that deer are present in the surrounding countryside and an allotment would be an attractive feeding location, encouraging more deer at a time when the City of London Corporation is trying to reduce their number to protect the Forest from them. We would be interested to know how the allotment would be protected from the deer without the installation of visually intrusive fencing which would affect the landscape character of the Forest?
- This is linked to the absence of a full and quantified assessment of Biodiversity Net Gain given that the development represents an increase in the number of residences. There are references to the provision of bat boxes etc to accommodate the existing roost which would be lost but little else.
- We would also like to see a planning condition imposed, should the proposal be approved, to ensure that the “...affected bat population can continue to function as before...” as specified in Natural England guidance (<https://www.gov.uk/guidance/bats-advice-for-making-planning-decisions>).

- Given the proximity of roosting and foraging bats, and the site's location close to the Forest, should the proposal be approved, lighting should be installed in accordance with guidance of the Bat Conservation Trust and so that it reduces any illumination of the SSSI.
- There is limited discussion of Air Pollution caused by an increase in traffic movements nor any reference to the requirement to install Electric Vehicle (EV) charging points nor the desirability of installing roof-mounted solar panels to pursue the Council's clean air policies and to reduce general pollution affecting Epping Forest.
- We note the developers offer to fund general mitigation measures through a s.106 agreement.

We believe the above issues are significant and need to be taken into account by the planning authority as it considers the above application.

Yours faithfully

Peter Lewis

Chief Executive

Epping Forest Heritage Trust