



**Epping Forest
Heritage Trust**

20th December 2023

Planning application – EPF/2587/23 - Land to South of Vicarage Lane, North Weald Bassett, Epping, CM16 - Application for hybrid planning permission, seeking outline planning permission with all matters reserved, except for principal means of vehicular access from the A414 and Vicarage Lane West, for a mixed use scheme comprising residential development (Use Class C3); reserved land for a primary school with associated playing fields (Use Class F1); mixed use development including retail, early years or community uses (Use Classes E and F2); associated green infrastructure, including public open space, formal and informal play and recreation areas; drainage infrastructure; other associated site infrastructure; and, diversion and extinguishment of public rights of way. Detailed planning permission sought for the primary road; Suitable Alternative Natural Green Space (SANG) provision; and surface water attenuation.

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 the following comments on this application because:

- **It is unclear how this application will be considered in the absence of an endorsed Strategic Masterplan Framework (SMF) for North Weald Bassett.**
- **The overall increase in traffic volumes in the EFDC area has the potential to cause additional damage to the Forest. We are concerned that the traffic impacts upon the air quality in the Forest SAC and SSSI are not being revisited as part of this application.**

We note that the site has been allocated for residential and related developments in the adopted Local Plan as site allocation NWB.R3. While we recognize that new housing is urgently needed, we remain very concerned about the potential impact of this, and other large-scale developments in the EFDC area, upon Epping Forest which is already suffering significant damage from increased footfall and air pollution from traffic.

We welcome EFDC's intention to publicise and consult widely on such developments, and note the need for certain elements of the development to be agreed upfront, but we would be grateful for clarification of how this application will be considered by the planning authorities when the Strategic Masterplan Framework (SMF) is out for consultation and has not been endorsed by Epping Forest District Council? Paragraph 5.88 of the Local Plan states that: *"Planning applications...should be accompanied by a Strategic Masterplan for the North Weald Bassett Masterplan Area which demonstrates that the development requirements set out in this Policy have been accommodated and which has been endorsed by the Council."* Given our concerns over the impact of traffic on the Forest, we believe it is vital that applications can demonstrate that they are meeting the development requirements on sustainable travel and air pollution policies set out in the Local Plan (Policies P6 F, I, and J) and reflected in an endorsed SMF.

We note the developer's commitment to contribute financially towards the Council's Interim Air Pollution Mitigation Strategy and Strategic Access Management and Monitoring Strategy (SAMMs), and welcome the planned provision of a SANG and other green open spaces representing 31% of the site, the biodiversity net gains and the provision of cycle and

footpaths. These will represent an essential means of reducing footfall and recreational vehicle trips to the nearby Forest.

However, we remain very concerned about additional traffic through the Forest (the Wintry Wood SSSI is only some 2kms away and the SAC under 6kms) and the impact this may have through increased air pollution. Natural England has recognised that pollution has damaged the flora of the Forest and increased traffic will damage it further. The traffic analyses in the application indicate that the development will create approximately 410 and 435 additional two-way vehicular trips within the morning and afternoon peak hours respectively and that, even when sustainable transport mitigation measures are taken into account, there will be a significant increase in traffic volumes.

We welcome the sustainable transport proposals including public transport, provision of cycle and foot paths etc and recognise that they will help reduce vehicle usage, however, paragraph 8.16 of the Transport assessment states that 82% of commuting journeys will still be made by car. While an increasing number of vehicles may be electric, the Government's current target of 2035 to phase out petrol and diesel vehicles means that there will be polluting cars using roads near or in the Forest for a significant number of years to come.

We were therefore concerned to see in paragraph 1.3 of the Technical Appendix C to the Air Quality report in the Environmental statement that "*...the potential air quality impacts [upon the SAC] have already been considered in the Local Plan evidence base, including the HRA, and need not be considered further in this air quality assessment.*". We would imagine that this issue would have been revisited as the detail of the development comes more into focus and more accurate assessments can be made.

On the evidence presented, we cannot agree with the comment in the Planning Statement, at least in relation to vehicle pollution, that:

“5.42 As set out within the Habitats Regulations Assessment section of this Statement, the provision of this SANG, along with the necessary contributions towards the Council’s Interim Air Pollution Mitigation Strategy and Strategic Access Management and Monitoring Strategy, will ensure that the proposed development will not result in any adverse effects on the integrity of any designated sites, either alone or in-combination with other plans and projects.”.

We would look to EFDC to be ambitious and innovative in considering additional means of reducing traffic volumes through the Forest or, in the worst case, to mitigate its effects.

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