



**Epping Forest
Heritage Trust**

20th December 2023

Planning application - EPF/1965/23 - 9 Crown Hill, Upshire, Waltham Abbey EN9 3TF -

Proposed conversion of existing stable block to form a 4 bed 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 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 residences within the Green Belt.**
- **It will result in increases in visitor footfall and traffic in the Forest SAC with a consequent increase in air pollution.**

The National Planning Policy Framework (NPPF) is clear that construction of new buildings, with exceptions, is inappropriate in the Green Belt. The redevelopment of the existing unused stables into a new residential property as proposed does not fall within the description of these exceptions and also represents a change of use.

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 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 are likely to have an impact upon the Forest SAC.

There are also a number of other concerns:

- There is no Arboriculture report to enable a relevant assessment of a development surrounded on three sides by the Forest SAC.
- We note that the HRA concludes that there will be some likely effects upon the SAC resulting from this development and therefore suggest that a Stage 2 report is needed particularly as the proposed building is within 400 meters of the Forest.
- The proposal is within 500m of Ancient Woodland and therefore the Forestry Commission may need to be consulted as a non-statutory consultee.
- The provision of EV charging points does not appear to have been covered in the sustainability checklist.
- Noting that this is a small-scale development, should the development be approved, which we hope it is not, a Construction Environmental Management Plan or similar should be required to ensure that any potential damage to the Forest SAC is prevented during the construction phase.

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