Epping Forest Heritage Trust

16th September 2025

**EFDC - STRATEGIC MASTERPLAN FRAMEWORK - WALTHAM ABBEY NORTH**

**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, the acceleration of nearby developments and increased visitor numbers have led to a reduction in the biodiversity of the Forest (flora and fauna). Future development, including plans to build 68,000 housing units in its vicinity, further threaten its resilience through anticipated increases in visitor numbers and pollution. In addition, budget cuts have meant that 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 the draft Strategic Masterplan Framework (SMF):**

- **We note that the Waltham Abbey North SMF is being produced by the developers not EFDC and that, while it has not been yet been approved by EFDC nor the consultation concluded, an Outline Planning Application has been submitted contrary to EFDC policies. Interested parties do not therefore have the information required for a fully informed consideration of the above application.**
- **Given the sites' location some 2-3km from the Epping Forest SAC-SSSI, there is insufficient recognition and attention given to the possible recreational and air pollution impacts on the SAC contrary to Local Plan Policy DM2 Epping Forest SAC. We do not accept the EFDC's position that new residents will largely visit the Lee Valley Park and not the Forest, and further consideration should be given to the impact on the Forest SAC through a comprehensive project-level Habitats Regulations Assessment (HRA).**
- **We note that there is currently no intention to upgrade/widen Galley Hill Road. References to this should therefore be removed from the SMF. Parts of this road run through narrow strips of Forest Land and the Trust would strongly object to**

**any proposals which damaged these areas. We would also wish to see measures taken to reduce or prevent the use of Avey Lane and Forest Side as "rat runs" through the Forest and believe that this should be covered in the SMF.**

- **There is insufficient focus on the provision of sustainable travel options which will be vital to reduce traffic on Forest and nearby roads. We would expect to see binding commitments obtained as soon as possible from the developers to the various sustainability measures, including the funding of bus routes and creation of greenspaces on the site, to ensure that additional vehicle trips through the Forest are kept to a minimum.**

We note that the sites are allocated for development in the adopted Local Plan resulting in the construction of a minimum of 740 new homes and associated facilities, that an Outline Planning Application has already been submitted and that there will be separate detailed planning applications for each site. We also note that the sites are within the 6.2km Epping Forest Recreational Zone of Influence (ZoI) and are some 2.5-3 kms away from the Epping Forest SAC-SSSI.

**Outline Planning Application**

We are concerned that an Outline Planning Application for sites WAL.R1 and R3 has been submitted before the SMF consultation has finished and the SMF is endorsed by Councillors. Local Plan Policy P3 Waltham Abbey L. is clear that:

*"Waltham Abbey North Masterplan*

*L. Planning application for sites WAL.R1, WAL.R2, WAL.R3 and WAL.T1 should be accompanied by a Strategic Masterplan for the Waltham Abbey North Masterplan Area which demonstrates that the development requirements set out in this Policy have been accommodated and which has been endorsed by the Council. The endorsed Strategic Masterplan will be taken into account as an important material consideration in the determination of any planning applications."*

The original closing date for comments on this application was some three weeks before the closing date for comments on the SMF and the application could not therefore be assessed against an endorsed Masterplan contrary to EFDC's own policy. There was a similar situation with planning applications and the North Weald Bassett Masterplan.

We also note that comments are to be sent to the developers not to Council officials which raises concerns about accountability for the Masterplan.

**Impacts on the Epping Forest SAC-SSSI**

Given the sites' location some 3km from the Epping Forest SAC-SSSI, there is insufficient focus and attention given to the possible recreational and air pollution impacts on the SAC contrary to Local Plan Policy DM2 Epping Forest SAC. We note that an overarching HRA was prepared in 2022 to accompany the Local Plan upon which the Shadow HRA prepared by the developer for this specific application appears to rely. A comprehensive project-level HRA, with updated information on recreational and air pollution impacts, is required to support all associated planning applications including the Outline one which has already been submitted.

Relevant to this, we are not convinced by the argument in the EFDC's Green Infrastructure Strategy "Implementation: Green Infrastructure in Strategic Allocations" 3 April 2021, page 142, that:

> *"Whilst the Masterplan area is located within the Zone of Influence of the Epping Forest SAC, its proximity immediately adjacent to the LVRP is such that the provision of a meaningful proportion of bespoke SANG would be difficult to justify."*

The Forest represents a different landscape and recreational experience to the Lee Valley Park and, given the sites' close proximity to the Forest, we believe a substantial number of visits to it are highly likely. In our view provision of "Suitable Alternative Green Spaces" (SANG) should be reconsidered.

**Traffic Impacts on the Forest SAC-SSSI**

While the main motorway junctions are to the south of the sites, residents travelling to parts of London and elsewhere in Essex may travel through the Forest including commuting to the Underground stations at Epping, Loughton and Debden. We were surprised that the possibility of residents travelling to these stations are not reflected in the SMF. We would expect to see a full analysis of likely vehicle trips through the Forest before any planning applications are considered.

We would also wish see measures taken to prevent "rat-running" through the Forest along Avey Lane and Forest Side. This is already a cause of air pollution in the Forest, as well as a road safety issue for Forest visitors, and is likely to increase with the additional vehicle trips generated by the new developments.

We would also strongly object to any upgrading/widening of **Galley Hill Road**, which is included in the adopted Local Plan Policy P3 Waltham Abbey M. vi) as a possibility, if it were to damage the narrow strips of Forest Land which are next to certain sections of the road. References to this should now be removed from the SMF.

**Sustainability**

To ensure that vehicle trips through the Forest are kept to a minimum, we would expect to see legally binding commitments secured as soon as possible from the developers to the various sustainability measures. These include the funding of bus services, the provision of a mobility hub and the creation and maintenance of greenspaces and consideration of a reduced number of car parking spaces per residence on the sites given their "good connectivity" as described in Part 1 of the Transport Assessment accompanying the Outline Planning Application.

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

Yours faithfully

Peter Lewis

Chief Executive

Epping Forest Heritage Trust