



**Epping Forest
Heritage Trust**

28 October 2025

Planning Application - EPF/2137/25 - Land adjacent to Theydon Bois Station, Abridge Road, Theydon Bois - Request for Environmental Impact Assessment (EIA) Screening Opinion - Proposed Residential Development of up to 150 Dwellings with Associated Infrastructure and Landscaping.

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 strongly contend that an Environmental Impact Assessment (EIA) is necessary and strongly object in principle to this speculative proposal:

- **We note that, at “...up to 150 dwellings...”, the proposal is just a single dwelling outside the threshold specified in the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 and Environmental Impact Assessment guidance. Nonetheless, given the cumulative impact of proposed developments not in the adopted Local Plan and the site's proximity to a sensitive notified site,**

the Epping Forest SAC-SSSI, we believe an EIA is essential. Natural England and the Corporation of London should be consulted.

- The ***cumulative*** environmental impact of this application alongside similar speculative requests for an EIA screening opinion for proposed large scale developments at sites **not** designated for development in the adopted Local Plan (Upshire (EPF/1968/25), Epping (EPF/2120/25)) and the North Weald Park site (EPF/1039/25) should be assessed in accordance with National Planning Policy Guidance, Environmental Impact Assessment (see below).
- Epping Forest District does not have a Housing Land Supply or Housing Delivery deficit and this, and other speculative proposals, should be therefore rejected.
- Re. the development proposal, the site is Green Belt and **not** in an area classified for residential or development in the adopted Epping Forest District Local Plan. It is some 1.5km away from the Epping Forest SAC-SSSI and within the 6.2km Recreational Zone of Influence.
- The application represents a major development which is inappropriate in, and would be harmful to, the Green Belt, in particular to its openness, contrary to paragraph 153 of the National Planning Policy Framework.
- The proposed development does not qualify under any of the exceptions to Green Belt development as detailed in paragraph 154 of the NPPF nor do Very Special Circumstances exist.
- We believe that the proposed large-scale “windfall” development would damage the Forest SAC-SSSI through increased vehicle traffic and consequent air pollution

and through increased visitor footfall and that existing mitigation measures will not be adequate to counter the additional damage that would be caused by such a large development. Their impact, particularly on the Epping Forest SAC, will not have been covered in the Habitats Regulations Assessment (HRA) which accompanied the Local Plan submission.

Need for an Environmental Impact Assessment

We do not agree with the applicant's conclusions that the proposed development would not be likely to have significant effects on the Forest or the wider environment. We believe that significant environmental effects are likely from a development of this size, given the site's proximity to the geographic area of the Forest, through the impact of additional visitor footfall and air pollution on the protected and sensitive Epping Forest SAC site.

We note that a proposal of "...up to 150 dwellings..." falls outside the thresholds in the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 and the Government's Guidance on Environmental Impact Assessment by a *single* dwelling. We believe, however, that an EIA is required due to the cumulative effects which the Council must consider (see below) and because of the close proximity of a protected and sensitive site, the Epping Forest SAC-SSSI as specified in Schedule 3 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

Paragraph 18 of the Government's EIA guidance is also clear that it should not be presumed that:

*“...those [developments] falling below these thresholds could never give rise to significant effects, especially where the development is in an environmentally sensitive location. **Each development will need to be considered on its merits.**”*

If, however, the Council does judge that an EIA is not required for this site in view of the threshold, should any future applications be submitted for **more** than 150 dwellings, bringing the application within the thresholds, we would expect the Local Authority to require the developers to produce an EIA retrospectively in accordance with Section 10 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017: *Subsequent applications where environmental information not previously provided.*

We believe that it is important that the cumulative environmental effects are also taken into account given the two other speculative proposals on sites not designated for development at Uphire and east of Epping (see above), the North Weald Park planning application (EPF/1039/25), and the scale of development already approved in principle elsewhere in the District (at Latton Priory, North Weald, Epping South and Waltham Abbey Parklands). This is in accordance with National Planning Policy Guidance, Environmental Impact Assessment paragraph 024 ref: 4-024-20170728:

*“The local planning authorities should **always** have regard to the possible cumulative effects arising from any existing or approved development.”.*

Green Belt

The site is in the Green Belt and its development of the size proposed would inevitably result in a loss of openness and have a detrimental impact on the Green Belt constituting inappropriate development which is, by definition, harmful to the Green Belt as per paragraph 154 of the NPPF and relevant Local Plan policies. The application is not covered by any of the exceptions listed in paragraph 154 of the NPPF nor do we believe that Very Special Circumstances exist to warrant approval. The Council's assessments are that Housing Land Supply and Housing Delivery targets are being met. Furthermore, we do not believe that it could be argued that the site constitutes "grey belt" as it contributes strongly to checking the unrestricted sprawl of Theydon Bois in accordance with Green Belt "Purpose A" and the National Planning Policy Guidance. It should therefore remain classified as Green Belt.

Impact on the Epping Forest SAC-SSSI and "Windfall sites"

We disagree that the proposed development is unlikely to have significant effects on the Epping Forest SAC-SSSI. Recently, Natural England concluded that a "non-Local Plan" development at Upshire would likely have a significant impact on the Epping Forest SAC-SSSI through additional visitor footfall and air pollution from increased traffic on roads in or near the Forest. In our view, given the scale of existing development in Epping Forest and the damage the Forest is suffering, *any* new development which results in additional housing will have a detrimental effect upon the Forest SAC, both alone and in combination with other developments, contrary to the Conservation of Habitats and Species Regulations, 2017 and to Local Plan Policy DM2.

Given that this is a “windfall site” not in the Local Plan, and that the cumulative “allowance” for such sites, in accordance with Appendix 5 of Part 1 of the Local Plan, is 210 dwellings up to 2032/33, a proposal of this size cannot have been covered within the Habitats Regulations Assessment (HRA) which assessed the impact of Local Plan development upon the Forest.

Furthermore, we do not accept that, given the scale of the proposed development (which could result in at least an additional 200 vehicles and some 400 residents), and its close proximity to the Forest, the existing measures mitigating the impact of developments on the Forest SAC would be sufficient. The development would therefore result in unmitigated damage to the SAC contrary to the national and local policies quoted above.

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

Yours faithfully

Ishmael Tikly

Policy & Campaigns Manager

Epping Forest Heritage Trust