



**Epping Forest
Heritage Trust**

26th January 2026

Planning Application - EPF/2477/25 - Land east of Stonards Hill, Epping, Essex -

Construction of up to 80 new homes with associated car parking and amenity space, new vehicular access from Stonards Hill, provision of attenuation features, a play area, green infrastructure, paths within the site and cyclist and pedestrian links, with all matters reserved apart from access.

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 object to this speculative proposal:

- **The application the site is the Green Belt and not in an area designated for residential development in the adopted Epping Forest District Local Plan. It represents a 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. Epping Forest District does not have a Housing Land Supply or Housing Delivery deficit and this, and other speculative proposals, should be therefore rejected.**

- The site is not “grey belt” and, the site itself, and as a part of the wider surrounding area, contributes strongly to preventing the sprawl of Epping.
- We believe that this “windfall” development would damage the Forest SAC-SSSI through increased vehicle traffic and consequent air pollution and through increased visitor footfall. Their impact on the Epping Forest SAC-SSSI, resulting from speculative application, will not have been covered in the Habitats Regulations Assessment (HRA) which accompanied the Local Plan submission and therefore that existing mitigation measures will not be adequate to counter the additional damage that would be caused.

We note that the site is within the Green Belt and the 6.2km Recreational Zone of Influence, is 2.2Km from the Epping Forest SAC and some 350m from the Lower Forest SSSI and is within the latter’s Impact Risk Zone.

Green Belt

The site is in the Green Belt in an area not designated for residential development in the adopted Local Plan (and therefore represents a “windfall” site). Its development, which includes three storey buildings, 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 Delivery targets, and Housing Land Supply, are being met (see the Officer's Report on EPF/1039/25 - North Weald Park, Former North Weald Golf Course, Rayley Lane, North Weald Bassett, CM16 6AR) so a failure to meet these targets does not apply in this case and does not represent a Very Special Circumstance.

Grey Belt

We do **not** accept that the site is "grey belt". The site is located on the edge of Epping and therefore contributes strongly to checking the unrestricted sprawl of the town to the south and east, in accordance with Green Belt "Purpose A" and the National Planning Policy Guidance as the site is adjacent to a large built-up area and its development would result in an incongruous pattern of development with a "finger" of development into the countryside. We disagree with the statement in paragraph 7.8 of the Planning Statement that: *"It is entirely appropriate, therefore, to undertake an assessment of the individual site at Stonards Hill, rather than seeking to establish the contribution which the site may make to the purposes of the Green Belt as part of any wider strategic land parcel."* Such an approach could lead to a situation where small parcels of land which, by the very nature of their small size, could not strongly contribute to Green Belt purposes are being assessed piecemeal without due regard for the preservation of the Green Belt and the policy intent of introducing the grey belt. The site needs to be considered as part of the wider local landscape for purposes of assessing its grey belt status and its contribution to preventing sprawl. Designating the site as grey belt would also be pre-judging EFDC's ongoing Green Belt/Grey Belt review.

Furthermore, as the proposal will will cause unmitigated harm to a designated habitat ie. the Forest SAC (see below), Footnote 7 of the National Planning Policy Guidance is triggered. This excludes land from grey belt designation where the application of the policies relating to the areas or assets in Footnote 7 (which includes habitats site such as the Forest SAC-SSSI) would provide a strong reason for refusing or restricting development. The site should therefore remain classified as Green Belt.

Impact on the Epping Forest SAC-SSSI and “Windfall sites”

Non-Local Plan sites - The impact upon the Epping Forest SAC-SSSI has not been adequately addressed as required under the Conservation of Habitats and Species Regulations, 2017. It is not sufficient just to commit to paying towards mitigation as is stated in the shadow HRA. 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, we do not believe that this proposal is covered within the Habitats Regulations Assessment (HRA) which assessed the impact of Local Plan development upon the Forest. We therefore do not accept the conclusion in paragraph 5.0 of the “Information to Support Habitat Regulations Assessment” document that: *“As this approach is embedded in existing local planning processes it can be concluded that increased visitor pressure has no likely significant effect on the qualifying features of the SAC.”*.

EFDC were clear in responding to application EPF/1039/25 - North Weald Park, Former North Weald Golf Course, Rayley Lane, North Weald Bassett, CM16 6AR that, for sites that are not allocated in the adopted Local Plan, their impact is additional to that assessed and

accounted for within the SAMM strategy. We would argue that this also applies to the impact of air pollution upon the Forest.

Therefore, a project level HRA is required and, vitally, an assessment of what *additional* mitigation could be offered to compensate for both increased visitor footfall in the Forest SAC and increased air pollution to the Forest caused by additional vehicle trips. *Otherwise, the development would result in unmitigated damage to the SAC contrary to the national and local policies quoted above.*

Cumulative Impacts - In our view, given the scale of existing development in Epping Forest, *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 Habitats and Regulations, 2017 and to Local Plan Policy DM2. It is therefore vital that the cumulative environmental effects are also taken into account given the number of other speculative proposals on sites not designated for development including the “Epping East” proposal.

Impact on The Lower Forest/Wintry Wood SSSI – The Lower Forest does not form part of the SAC and therefore the impact upon it from nearby developments is often not considered. However, in this case the site is some 350m away from the site and is within the SSSI’s Impact Risk Zone. Residents would drive on roads adjacent to it and would be likely to visit it for recreational purposes. It is unclear whether these issues have been fully considered and, if not, they should be in accordance with national policies and Local Plan Policy DM1 Habitat Protection.

In addition, the development would be adjacent to two areas of **Ancient Woodland**. Such proximity would without question create disturbance and urban effects in these areas and

reduce biodiversity. The Epping Forest SAC-SSSI does not exist in isolation and many species also rely upon surrounding areas of countryside as habitat, particularly areas as rich as ancient woodland. Developing this site will therefore have a detrimental impact upon the biodiversity of the Forest SAC contrary to both national and local policies.

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

Peter Lewis

Chief Executive

Epping Forest Heritage Trust