



**Epping Forest
Heritage Trust**

18th March 2026

Planning Application - EPF/2567/25 - Land South of Chigwell Rise, Chigwell, IG7 6AQ -

Development of residential units (Class C3) and Flexible Class F2(b/E(e) use with provision of access, landscaping, vehicle and cycle parking, sustainable urban drainage systems and other associated works.

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 in principle to this speculative proposal:

- **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 a speculative application, will not have been covered in the overarching 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 contrary to Local Plan Policy DM2.**
- **The application site is in 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 extremely harmful to, the Green Belt, in particular to its openness, contrary to paragraph 153 of the National Planning Policy Framework (NPPF).

- 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, using this as a basis 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 merger of the built-up area of Chigwell/Hainault with both Buckhurst Hill and Woodford Bridge.**

We note that the site is within the Green Belt, is **not** designated for development in the adopted Local Plan and is some 1.5km from the Epping Forest SAC well within the 6.2km recreational Zone of Influence.

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

We completely disagree with the statements in paragraphs 7.69 and 7.70 of the Planning Statement that:

“... there would be no impact from particulate matter, hydrological changes, light pollution, visual disturbance, noise disturbance or the deterioration of qualifying or functionally linked habitat.

7.70 An Appropriate Assessment will be undertaken by EFDC to confirm the Proposed Development will not have an adverse impact on the SAC.".

The provision of 232 residencies would lead to an additional population living close to the SAC of some 550 based on Office for National Statistics figures and 422 parking spaces will mean at least that number of additional vehicles potentially using the roads in and around the Forest. Both would lead to damage to the Forest SAC through increased visitor footfall and air pollution contrary to Local Plan Policy DM2 and the Habitats Regulations. (Given the proximity of Chigwell Underground Station and the good bus services, there is a strong argument for reducing the number of parking spaces which would in turn reduce polluting traffic in the Forest.) As both Natural England and EFDC's HRA Consultant have stated, there is insufficient information to enable a proper consideration of the impact and the application should therefore be rejected.

Non-Local Plan sites – Moreover, 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 overarching Habitats Regulations Assessment (HRA) which assessed the impact of Local Plan development upon the Forest.

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.

The development would therefore result in unmitigated damage to the SAC contrary to the national and local policies quoted above and should be rejected.

2. Cumulative Effects on the Epping Forest SAC-SSSI

In our view, given the scale of existing development in Epping Forest, any new development which results in additional housing above that already covered by the Local Plan 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 when considering this current application and any other speculative proposals on sites not designated for development.

3. Green Belt

The site is in the Green Belt and a development of the size proposed would inevitably result in a major loss of openness. The site, given its location on the eastern slope of the River Roding valley, is visible from large parts of the surrounding area. Its development would therefore have an impact on the openness of the Green Belt beyond the immediate area and that would be visible for a considerable distance. The development would therefore have a detrimental impact on the Green Belt constituting inappropriate development which is, by definition, harmful to the Green Belt as per paragraph 153 of the NPPF and the 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 (VSC) 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.

4. Grey Belt

We do not accept the conclusion that the site constitutes "grey belt". It is free of existing development, forms a substantial part of the gap between built-up areas and therefore contributes strongly to preventing the merger of the suburban area of Chigwell/Hainault with both Woodford Bridge and Buckhurst Hill in accordance with Green Belt "Purpose B" and the National Planning Policy Guidance. That aside, the site, and similar sites, need to be considered as part of the wider landscape for the purposes of assessing its grey belt status and, equally importantly, whether development would fundamentally undermine the purposes of the Green Belt across the Local Plan area as described in paragraph 009 of the National Planning Policy Guidance (NPPG).

Furthermore, as the proposal 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.

For the reasons above, the site should therefore remain classified as Green Belt.

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