
From: Vetta, Tristan <Tristan.Vetta@cityoflondon.gov.uk>
Sent: 06 January 2021 16:13
To: App Comment
Subject: EPF/2928/20
Attachments: 2928 EPF - 2 The Uplands Loughton.pdf

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Dear Planning team,

Please see comments on application.

Kindest regards,

Tristan Vetta

Land Agent & Planning Officer
Open Spaces Department - Epping Forest
e-mail: Tristan.vetta@cityoflondon.gov.uk

The Warren

Loughton

Essex

IG10 4RW

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Open Spaces Department

Colin Buttery
Director of Open Spaces



Telephone 02085321010

Your ref EPF/2928/20

Date 06/01/2021

Email: Tristan.vetta@cityoflondon.gov.uk

Development Control,
Epping Forest District Council,
Civic Offices,
High Street,
Epping,
Essex,
CM16 4BZ

Dear Sir/Madam

2 The Uplands, Loughton, Essex, IG10 1NH

I refer to the above proposed application for demolition of existing garage structure. Erection of two semi-detached 2 bedroom (3 person) dwellings to rear of retained host dwelling

Epping Forest is owned by the City of London and comprises some 6000 acres (2,500 hectares). The Epping Forest Act 1878 charged the City as Conservators of Epping Forest, with a duty to conserve varied vegetation and preserve the Forest's natural aspect.

Epping Forest is of international importance for its woodland and heathland habitats and for the presence of certain species such as the Stag Beetle. The site is designated as a Special Area of Conservation (SAC) and thus afforded full protection by law under the provisions of the Habitats Regulations (2017, as amended). It is the role of Epping Forest District Council, as competent authority, to ensure that the requirements of the Habitats Regulations are met before deciding whether to authorise any planning application. Where a particular application would be likely to have a significant effect on the SAC, an appropriate assessment and integrity test is required before that application is authorised.

The Conservators object to this windfall application because no Habitats Regulations Assessment (HRA) has been submitted with the plan. The application poses risks to the SAC through increased recreational use, urban effects and reductions in air quality (as a result of increased traffic). These issues are identified in the incipient **policy DM2 (E)** in the Local Plan Submission Version (LPSV) and discussed in detail in the HRA that accompanied the Plan. In order for Epping Forest District Council to comply with the regulations, an HRA must accompany the application and rule out adverse effects on integrity, alone or in-combination with other plans or projects.

It is the Conservators firm belief that there is a need for an exclusion zone around the SAC to prevent adverse effects and that a minimum we would expect to see a full HRA for the site – especially in the absence of an agree strategic Plan-level HRA.

As the Forest is the closest 'green / open' space within the locality (250m) and the nearest alternative green space, which is very limited in size is nearly four times the distance away, it is significantly likely that the Forest would represent the most attractive area for recreation. As Epping Forest Visitor Surveys have shown, about half of all visits to the Forest are made by those living within 3km of the boundary, it is likely that this proposal will add to the existing level of visitor disturbance. This likelihood increases in the case of the proposed development given that the private outdoor space for each development is very limited. This is supported by the Proximity to Public Amenity Space document provided by the application.

I also refer to The Planning Inspectorate decision on 13-15a Alderton Hill, Loughton, Essex, IG10 3JD. In which the inspector noted the recreational impacts of developments to the SAC within 3km, which led to the refusal of the appeal. As well as The Planning Inspectorate decision (9th September 2020) at 69 Browning Road, Leytonstone, London, E11 3AR where the windfall scheme would result in increased recreational pressure upon the SAC.

Therefore, we await further developments of the Local Plan to understand how this proposal fits with the overall approach towards the local authority's legal requirement to protect Epping Forest SAC, particularly in relation to recreational pressure.

The Conservators of Epping Forest are grateful for the opportunity to comment on this proposal.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Tristan Vetta', with a long horizontal line extending to the right.

Mr Tristan Vetta
Epping Forest Land Agent