CHIGWELL PARISH COUNCIL

Planning Committee - Officer Report

Application: EPF/0729/26
Location: Land East of Hainault Road, Chigwell
Proposal: Outline application for up to 250 homes (50% affordable), commercial and community uses, a nursery, care/retirement accommodation, open space and associated infrastructure.

Report

This application proposes major development on Green Belt farmland between Hainault Road, Chigwell Brook, the Courtland Estate, Vicarage Lane and the Central Line railway. The overall site covers approximately 39 hectares, with around 12.6 hectares proposed for development. The remaining land would largely be used for open space, public access and biodiversity improvements.

The application is for outline permission, with only access being determined at this stage. However, approval would establish the principle of development on this Green Belt site. The Council must therefore be satisfied that the location, nature and maximum amount of development are acceptable now, rather than assume that fundamental problems can be resolved through later design changes.

The principal objection is that this is inappropriate development in a strategically important part of the Metropolitan Green Belt. The applicant has not convincingly demonstrated that the land qualifies as grey belt, that the proposal meets an alternative exception to Green Belt policy, or that very special circumstances exist to justify the harm.

Although the proposal offers affordable housing and public open space, those benefits must be considered against the permanent loss of Green Belt, the site's strategic function in resisting urban sprawl, landscape harm, traffic, school places and the reliability of the applicant's technical evidence.

Green Belt

The most serious concern is the permanent loss of an important area of Green Belt countryside and the applicant's failure to establish that development of this nature and scale is acceptable under national Green Belt policy.

The National Planning Policy Framework establishes that development in the Green Belt is inappropriate unless it falls within a specified exception. It also states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

Chigwell is a village, not part of London. Its Green Belt borders the London Borough of Redbridge and plays an important role in preventing the Greater London built-up area from spreading further into Essex. The application site forms part of the open countryside extending towards Redbridge, Chigwell Row and Hainault Forest.

The development would create a substantial finger of housing and other buildings pushing eastwards into the Green Belt. It would permanently advance the built-up edge into open farmland, undermine the existing Green Belt boundary and weaken the protection of the land remaining beyond it.

This is not simply a question of the number of hectares occupied by buildings. The development would change the relationship between Chigwell, the surrounding countryside and the Green Belt boundary. Once housing and other urban uses have been established further east, the remaining countryside would become more enclosed and more vulnerable to future development pressure.

EFDC's own 2016 Green Belt assessment found that the relevant parcels, DSR-035.5 and DSR-035.6, made a Strong contribution to preventing urban sprawl, preventing settlements from merging and safeguarding the countryside from encroachment. It assessed the harm from releasing the land as Very High. The Council's subsequent site-selection work also identified the high Green Belt harm and landscape sensitivity associated with eastern expansion of Chigwell.

These are significant findings from the planning authority's own evidence base. The applicant has not convincingly explained why land previously assessed as performing such an important Green Belt function should now be treated as making only a limited contribution.

The applicant reaches a different conclusion largely by concentrating on the western development area rather than adequately considering its relationship with the wider Green Belt.

Its suggestion that the site is surrounded by development on three sides is misleading. Existing residential development is concentrated along the Courtland Estate and Vicarage Lane to the north and Hainault Road to the west. The southern boundary is formed by the Central Line railway and a substantial vegetation belt, not continuous housing. To the east, the land connects directly with the wider open countryside.

The site is therefore not an isolated pocket of land enclosed by urban development. It forms part of a much larger and continuous area of Green Belt countryside.

The proposed development would extend the settlement into that countryside and establish a new eastern urban edge. Existing hedgerows and field boundaries do not provide the same degree of permanence or defensibility as the railway boundary.

Importantly, the national Green Belt policy guidance specifically recognises that an extended finger of development can contribute to urban sprawl. The proposed development would have precisely that characteristic.

The Parish Council does not accept the applicant's classification of the site as grey belt. The land's strategic role in preventing urban sprawl, its connection with the wider countryside and EFDC's earlier assessments all provide substantial evidence against that classification.

The applicant must demonstrate that the proposal meets a specific exception to Green Belt policy. It is not enough simply to describe the land as grey belt or point to the housing benefits.

Nor does proximity to Chigwell Underground station automatically make this an appropriate location. The station's limited service frequency, the lack of convenient public transport alternatives, existing highway pressures and the scale of the proposed development all require careful consideration under the relevant policy tests.

Affordable housing and very special circumstances

The proposal includes 50% affordable housing. This is a material benefit, but it does not, in itself, justify development on this Green Belt site.

EFDC's adopted Local Plan already requires 40% affordable housing for a development of this size. The applicant is therefore offering an additional 10 percentage points above the established local requirement.

The Parish Council recognises the need for affordable housing and does not seek to diminish its importance. However, the additional provision cannot be considered in isolation from the substantial and permanent harm that development would cause.

The national Green Belt Golden Rules establish requirements for certain developments, including affordable housing, infrastructure and accessible green space. Compliance with those requirements does not, by itself, establish that land qualifies as grey belt or that a proposal satisfies every condition of an exception to Green Belt policy.

The applicant cannot use the affordable housing offer as a substitute for demonstrating that the development is acceptable in principle.

Where development is inappropriate, the applicant must demonstrate very special circumstances. The Green Belt harm, together with any other harm, must be clearly outweighed by other considerations.

The applicant has not convincingly demonstrated that the benefits of the scheme, including the additional affordable housing, outweigh the permanent loss of this strategically important Green Belt land, the encroachment into open countryside and the associated landscape, transport and infrastructure impacts.

The proposed public open space and biodiversity improvements do not remove the harm caused by establishing a substantial new area of urban development. Retaining the eastern fields as open space does not compensate for the loss of the western farmland or eliminate the wider consequences for Green Belt openness and permanence.

The Parish Council considers that the proposal constitutes inappropriate development in the Green Belt and that very special circumstances have not been demonstrated. It should therefore be refused unless the applicant can establish compliance with a relevant national Green Belt exception.

Landscape and visual impact

The proposed development would permanently change an area of undulating farmland, mature hedgerows, trees and open countryside views.

There are serious weaknesses in the Landscape and Visual Assessment prepared by Influence. Although it contains numerous photographs, it does not give a sufficiently representative picture of what people would actually see once the development was built.

In particular, no views were recorded from public footpaths Chigwell 77 and 78, despite their close proximity to the site. The assessment also gives insufficient weight to views from Courtland Drive, Daleside Gardens, Vicarage Lane and the higher ground to the east.

Influence relies heavily on trees and hedges to reduce the apparent impact, but the site's changing ground levels mean that buildings and rooftops would remain visible above vegetation. Screening would also be less effective during winter, and new planting would take many years to mature.

The applicant's own Design and Access Statement refers to EFDC's 2010 Landscape Character Assessment, which identifies this area as G3 Chigwell, within the Wooded Ridges and Valleys landscape. EFDC's assessment recognises the area's existing settlements and recommends that new development within the farmland should be small-scale, respect the historic settlement pattern and maintain characteristic countryside views.

This application does not meet those objectives.

Permission is sought for up to 250 homes, together with substantial commercial, nursery and care accommodation. The applicant has not convincingly demonstrated the landscape and visual effects of the maximum amount of development for which permission is requested.

The Council should not accept that the harm can simply be resolved through later design and planting. It arises principally from the location, scale and introduction of built development into open countryside.

Public footpaths

Public footpaths Chigwell 73, 77 and 78 as well as those linking to Green Lane are valued for their countryside setting, open views and tranquillity.

The developer proposes to retain and improve paths, but walking through open fields is not the same as walking through a housing estate. A surfaced path alongside houses and roads cannot replace the experience of walking through open countryside.

The loss of that rural setting would be permanent and has not been given sufficient weight.

Traffic and transport

The applicant's Transport Assessment forecasts 257 vehicle movements during the morning peak hour and 244 during the evening peak.

Its 2031 modelling predicts that the Hainault Road/High Road mini-roundabout would reach capacity in the morning, with the queue on Hainault Road increasing from approximately 7 to 16.5 passenger car units. The nearby High Road/Chigwell Rise junction is also predicted to reach capacity during peak periods. Despite these findings, no meaningful junction improvements are proposed.

The traffic surveys were carried out on just one day, 11 November 2025. The modelling assumptions deserve careful scrutiny, particularly where junctions are already predicted to have little or no spare capacity.

The applicant also overstates the availability of public transport. There is only one regular bus service in the immediate area, the 167. Two further services identified in the Travel Plan, the 667 and 677, are school-day services. The regular 462 stops approximately one kilometre away.

Chigwell Underground station is within walking distance but is on the Central Line loop, with limited direct services into central London. It is one of the least-used stations on the Underground network. Its presence alone does not demonstrate that the development is sustainably located or that the station is sufficiently well connected for the relevant Green Belt policy exception.

There are also no designated cycle routes in the immediate vicinity.

The development would therefore remain substantially dependent on private cars, adding pressure to junctions already predicted to reach capacity.

Epping Forest Special Area of Conservation

This is a particularly important concern because it has been raised by EFDC's own consultant.

In comments dated 28 October 2026, the Habitats Regulations Assessment consultant concluded that the applicant's traffic evidence was not sufficiently robust to assess the potential air-pollution effects on Epping Forest Special Area of Conservation.

The identified problems included traffic data collected during Covid restrictions, missing daily vehicle and HGV figures and weaknesses in assumptions about where vehicles would travel.

The applicant had therefore not demonstrated, on the evidence reviewed, that the necessary assessment of effects on this protected site could be completed satisfactorily.

Schools and infrastructure

The applicant estimates that the development would generate approximately 110 school-age children. Its own report records West Hatch High School operating above its stated capacity in 2024/25. The applicant suggests that some children might attend independent schools, including Chigwell School.

This is not a reasonable basis for assessing state-school capacity, particularly when half the proposed homes would be affordable housing.

The applicant has not demonstrated that sufficient school places would be available or that necessary additional provision would be funded and delivered.

There are similar concerns about the availability of healthcare and other local services. The possibility of commercial space being used for a GP surgery does not guarantee that one would be provided.

These infrastructure concerns are particularly relevant because national Green Belt policy requires certain development exceptions to demonstrate that necessary infrastructure can support the scheme.

Ecology and drainage

The site contains established hedgerows, mature trees, wildlife corridors and watercourses associated with Chigwell Brook.

Although the applicant proposes biodiversity improvements, these do not remove the permanent loss of countryside. The ecological evidence also identifies further bat survey requirements and contains inconsistencies in the stated site areas and open-space provision.

The Flood Risk Assessment recognises surface-water risks and the need to manage runoff across the sloping site, but detailed hydraulic and drainage-network modelling remains outstanding.

These matters add to the concerns about whether the full development proposed has been adequately assessed.

Conclusion

The proposal would cause substantial and permanent harm to a strategically important part of the Metropolitan Green Belt. It would create a finger of urban development extending into open countryside, advance the built-up edge of Chigwell and weaken the protection of the remaining Green Belt adjoining Greater London.

EFDC's earlier evidence assessed the relevant land as making a strong contribution to Green Belt purposes, with very high harm from release. The applicant has not convincingly justified its contrary grey-belt classification or demonstrated that the proposal satisfies another national Green Belt exception.

The proposed 50% affordable housing is acknowledged as a benefit. However, 40% is already required by the adopted Local Plan. The additional provision does not, on the evidence submitted, clearly outweigh the substantial Green Belt harm or establish very special circumstances.

The applicant has also failed to demonstrate the full landscape impact of the maximum development sought, while its own traffic forecasts show important junctions reaching capacity. Significant shortcomings have been identified by EFDC's consultant in the evidence required to assess Epping Forest SAC. Concerns remain about education and other infrastructure.

These objections concern the principle, location and scale of development. They are not simply matters that can be resolved through reserved matters, planning conditions or landscaping.

The officer recommendation is that Chigwell Parish Council STRONGLY OBJECTS to application EPF/0729/26 and requests refusal of outline planning permission for the reasons set out below.

Recommended Planning Objections

Chigwell Parish Council **STRONGLY OBJECTS** to application EPF/0729/26 and requests that Epping Forest District Council refuse outline planning permission.

The Parish Council considers that the proposal is unacceptable in principle. It would introduce substantial urban development into a strategically important area of Metropolitan Green Belt, permanently advance the built-up edge of Chigwell into open countryside and weaken the protection of the remaining Green Belt.

The applicant has failed to demonstrate that the land qualifies as grey belt, that the proposal meets an alternative exception to national Green Belt policy, or that very special circumstances exist to justify inappropriate development.

Inappropriate development in the Green Belt - failure to demonstrate very special circumstances

The application proposes substantial residential, commercial, nursery and care development on open farmland within the designated Metropolitan Green Belt. The land is not allocated for development in the adopted Epping Forest District Local Plan.

NPPF Policy GB6(1) establishes that development in the Green Belt is inappropriate unless it falls within one of the categories specified in Policy GB7.

Policy GB6(2) states "Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances."

It further requires that Green Belt harm, together with any other harm, must be clearly outweighed by other considerations and that substantial weight must be given to Green Belt harm, including harm to openness.

The proposed development does not fall within the conventional exceptions for agricultural development, limited village infilling, rural affordable housing exception sites or the redevelopment of previously developed land.

The Parish Council also rejects the applicant's argument that the land qualifies as grey belt under Policy GB7(1)(g), for the reasons set out below.

The application would introduce up to 250 dwellings and substantial additional buildings into open countryside. The resulting harm to openness would be both spatial and visual. It would replace open agricultural land with built development, roads, parking, lighting and associated urban activity.

The harm would be permanent and could not be removed through landscaping or the retention of adjoining fields as open space.

The Parish Council considers that the proposal constitutes inappropriate development in the Green Belt and that the applicant has failed to demonstrate very special circumstances sufficient to justify it.

The development is therefore contrary to the fundamental objectives of national Green Belt policy and the protection afforded by Local Plan Policies SP5 and DM4.

Failure to establish that the site is grey belt

The Parish Council strongly disputes the applicant's classification of the application site as grey belt.

The relevant land was assessed by EFDC in its 2016 Green Belt Stage 2 Assessment. Parcels DSR-035.5 and DSR-035.6 were identified as making a Strong contribution to preventing urban sprawl, preventing settlements from merging and safeguarding the countryside from encroachment.

The assessment identified Very High harm arising from release of the land from the Green Belt.

These findings are directly relevant to the present application. They establish that the land performs important Green Belt functions and that its development would have consequences extending beyond the immediate building footprint.

The applicant's assessment reaches a substantially different conclusion without convincingly explaining why the Council's earlier findings should now be disregarded.

In particular, the applicant has placed excessive emphasis on the western development area and its proximity to existing housing, without adequately considering its connection to the wider Green Belt or the strategic consequences of extending the settlement eastwards.

The site is not substantially enclosed by urban development. The Courtland Estate forms part of the northern boundary and existing development lies to the west. However, the southern boundary comprises the Central Line railway and its substantial vegetation belt, while the eastern land remains connected to extensive open countryside.

The proposal would therefore not fill an isolated gap within an established built-up area. It would extend the urban edge into previously undeveloped Green Belt.

The Parish Council considers that the applicant's grey-belt assessment understates the land's contribution to checking sprawl and safeguarding the countryside from encroachment.

The applicant has consequently failed to establish that the development satisfies the first requirement of NPPF Policy GB7(1)(g).

Unacceptable urban sprawl and weakening of the Metropolitan Green Belt

Chigwell's Green Belt performs a particularly important strategic function because of its location adjoining the London Borough of Redbridge and the Greater London urban area.

It helps maintain the distinction between Chigwell, the wider Essex countryside and London's outward expansion.

The proposal would create a substantial finger of development extending eastwards from the existing settlement into open farmland closer to the boundary with Redbridge. The consequence would not simply be the loss of the fields occupied by buildings. It would establish an entirely new built-up edge further into the Green Belt and close to London.

This is especially significant because the Green Belt's purpose is not merely to preserve attractive views or provide recreational land. Its fundamental purpose is to prevent urban sprawl by maintaining the openness and permanence of land.

Annex E of the 2026 NPPF expressly identifies the characteristics of extended fingers of development as relevant when assessing contributions to preventing urban sprawl. The proposed development would display those characteristics.

The existing railway and vegetation corridor provide a substantial and recognisable physical boundary. The new eastern edge would instead rely to a considerable extent on hedgerows, field boundaries and landscaping. Such features would provide a less robust and defensible long-term boundary and would leave the remaining Green Belt more vulnerable to further encroachment.

The Parish Council considers that the development would undermine the strategic function of this part of the Green Belt and create a harmful precedent for further outward expansion. This harm cannot be assessed solely by reference to the 12.6 hectares proposed for development or the allowance for green space within the site. The consequences for the surrounding Green Belt must also be considered.

The proposal conflicts with the Green Belt purposes identified in national policy and with Local Plan Policies SP5 and DM4.

Affordable housing does not justify the Green Belt harm

The applicant proposes 50% affordable housing and presents this as an important benefit of the scheme. The Parish Council recognises the need for affordable housing and accepts that its provision is a material planning consideration. However, Policy H2 of the adopted Epping Forest District Local Plan already requires 40% affordable housing for developments of this size.

The proposed 50% therefore represents an additional 10 percentage points above the adopted local requirement. Furthermore, NPPF Policy GB8 requires certain major housing developments on

Green Belt land to provide an enhanced affordable housing contribution. Where the relevant local policy has not been updated for that purpose, the national requirement is generally 15 percentage points above the existing requirement, subject to a 50% cap.

Accordingly, the applicant's 50% provision corresponds to the capped national Golden Rules contribution rather than representing an exceptional offer beyond that requirement.

The Parish Council considers that compliance with an applicable affordable housing requirement cannot, by itself, establish that inappropriate Green Belt development should be permitted.

The Golden Rules do not override the separate tests governing whether land qualifies as grey belt or whether development satisfies an exception under Policy GB7. Nor do they eliminate the requirement to demonstrate very special circumstances where development remains inappropriate.

The applicant has not shown why the additional affordable housing could only be delivered on this particular site or why its benefits should clearly outweigh the substantial and permanent harm arising from development of a strategically important part of the Metropolitan Green Belt.

The proposed public open space and biodiversity improvements are also acknowledged. However, retaining the eastern land as open space does not compensate for the permanent urbanisation of the western farmland. The loss of openness, the eastward movement of the built-up boundary and the weakening of the surrounding Green Belt would remain.

When the Green Belt harm is considered alongside landscape impacts, traffic congestion, inadequate sustainable transport and unresolved infrastructure concerns, the Parish Council considers that the benefits of the proposal do not demonstrate very special circumstances.

The Parish Council therefore rejects the proposition that 50% affordable housing provides sufficient justification for development on this site.

Failure to satisfy the national Green Belt exceptions

Even if the applicant were able to establish that part of the site qualifies as grey belt, that would not automatically make the development acceptable. NPPF Policy GB7(1)(g) imposes four cumulative conditions. These concern the grey-belt status and effect on the remaining Green Belt, evidenced unmet need, sustainable location and compliance with the Golden Rules.

The Parish Council considers that the applicant has not convincingly demonstrated compliance with these requirements. Its assessment of the land's Green Belt contribution is disputed, the site has limited sustainable transport choices and the applicant's own highway modelling predicts that important junctions would reach capacity. Concerns also remain about school places, community infrastructure and the adequacy of environmental and visual impact evidence.

The applicant must demonstrate that the development, taken as a whole, meets the relevant requirements, rather than relying on individual benefits while leaving other conditions unresolved.

The alternative exception under Policy GB7(1)(h) for residential or mixed-use development near a well-connected station is also not established. Although Chigwell Underground station is within walking distance, its location on the Central Line loop and the frequency and connectivity of services must be assessed against the NPPF definition of a well-connected station. Proximity alone is insufficient.

That exception also requires the proposal to be physically well-related to the station or settlement, to be of a scale that available or proposed infrastructure can accommodate, not to prejudice long-term comprehensive development and to comply with the Golden Rules for major development.

The applicant has not convincingly established those requirements, particularly given its own forecasts of highway capacity problems and the outstanding questions about education and other infrastructure. The Parish Council considers that the applicant has failed to demonstrate that the development is not inappropriate under either Policy GB7(1)(g) or Policy GB7(1)(h).

Landscape and visual harm

The development would permanently urbanise an attractive, undulating area of farmland within Landscape Character Area G3 - Chigwell, part of the Wooded Ridges and Valleys landscape identified in EFDC's 2010 Landscape Character Assessment.

The Council's landscape guidance recognises the importance of open arable fields, mature hedgerows, tranquillity and characteristic countryside views. It recommends that any new development within the farmland should be small-scale, respect the historic settlement pattern and maintain characteristic views. The proposed 250 homes and substantial additional buildings are fundamentally at odds with those objectives.

The Parish Council considers that the Landscape and Visual Assessment prepared by Influence is not representative and materially understates the likely harm.

No views were recorded from public rights of way Chigwell 77 and 78, despite their close relationship with the proposed development. The assessment also fails to demonstrate convincingly the effects from the wider footpath network, elevated countryside, Vicarage Lane, Courtland Drive, Meadow Way and Daleside Gardens.

Influence relies heavily on existing vegetation and proposed planting to minimise the apparent impact. This does not adequately reflect the site's undulating topography, the potential visibility of buildings above vegetation, winter conditions or the years required for planting to mature. Screening buildings does not remove the permanent loss of open countryside or the harm to Green Belt openness and landscape character.

The application seeks outline permission for up to 250 homes and substantial additional non-residential floorspace. The Parish Council is not satisfied that the applicant has demonstrated the visual effects of the maximum amount of development for which permission is sought. These are fundamental consequences of the location, scale and amount of development. They cannot simply be assumed to be resolved through later decisions on design and landscaping.

The proposal would cause significant harm to landscape character and visual amenity, contrary to Local Plan Policies SP6 and DM3.

Public rights of way and loss of rural amenity

The proposal would substantially harm the setting and enjoyment of public footpaths Chigwell 73, 77 and 78. These routes are valued because they pass through open countryside, providing rural views, wildlife and tranquillity.

Walking through open fields is not the same as walking through or around a housing estate. Retaining or improving the paths or providing new routes alongside houses and roads does not compensate for the permanent loss of their countryside setting.

The applicant has failed to give sufficient weight to this harm, which arises directly from the proposed urbanisation of the land.

Traffic congestion and highway capacity

The applicant's Transport Assessment forecasts 257 vehicle movements during the morning peak hour and 244 during the evening peak.

Its modelling predicts that the Hainault Road/High Road mini-roundabout would reach capacity, with the morning queue on Hainault Road increasing from approximately 7 to 16.5 passenger car units. The nearby High Road/Chigwell Rise mini-roundabout is also predicted to reach capacity during peak periods. Despite its forecasts showing junctions at capacity and substantially longer queues, the applicant proposes no meaningful highway improvements.

The traffic surveys were undertaken on a single day, 11 November 2025, and the original models were subsequently adjusted against those observations. The limited survey evidence and assumptions do not provide sufficient reassurance where the predicted junctions have little or no spare capacity.

The applicant has failed to demonstrate convincingly that the local highway network can accommodate the combined traffic generated by the housing, nursery, commercial and care uses without unacceptable additional congestion and delay. The Parish Council considers that the proposal has not demonstrated acceptable highway impacts, contrary to the objectives of Local Plan Policy T1 and national transport policy.

Unsustainable transport provision

The applicant has significantly overstated the site's accessibility by sustainable transport. There is only one regular bus service serving the immediate area, the 167. The 667 and 677 services identified in the Travel Plan are school services only, while the regular 462 stops approximately one kilometre from the proposed residential area.

The applicant's own Travel Plan acknowledges that the identified nearby bus stops are beyond the recommended 400 metre walking catchment and that there are no designated cycle routes in the immediate vicinity.

Chigwell Underground station is within walking distance but is on the Central Line loop, with limited direct services into central London and many journeys requiring a change of train. It is also one of the least-used stations on the Underground network.

The applicant has failed to demonstrate that existing public transport and cycling infrastructure would provide realistic alternatives to private vehicles for development of this scale. Travel packs, vouchers and promotional measures do not create additional bus services, cycle routes or improved rail connections. The development would remain substantially car-dependent, adding to the traffic pressures identified above.

The deficiencies in sustainable transport are also relevant to the Green Belt exceptions under Policy GB7.

Epping Forest SAC - inadequate evidence for the statutory assessment

EFDC's own Habitats Regulations Assessment consultant concluded that the applicant's traffic evidence was not sufficiently robust to enable assessment of the potential atmospheric-pollution effects on Epping Forest Special Area of Conservation.

The shortcomings identified included traffic data collected during Covid restrictions, missing daily vehicle and heavy-goods vehicle figures, inadequate traffic-distribution assumptions and insufficient consideration of the different commercial uses proposed.

These deficiencies raise serious questions about the reliability of the applicant's traffic assessment and its conclusions concerning potential effects on the protected site.

On the evidence reviewed, the applicant has failed to provide the information necessary for EFDC to complete a satisfactory Habitats Regulations Assessment and establish that the development would not adversely affect the integrity of Epping Forest SAC.

This is a fundamental statutory matter which cannot simply be deferred until after outline permission. Unless the outstanding deficiencies have been resolved, permission cannot lawfully be granted without the necessary conclusions under the Habitats Regulations.

Education and community infrastructure

The applicant estimates that the development would generate approximately 110 school-age children. Its Community Infrastructure Report records West Hatch High School operating above its stated capacity in 2024/25. The applicant suggests that independent schools, including Chigwell School, may accommodate some of the additional pupils. This is unsupported and cannot substitute for demonstrating adequate state-school provision, particularly when half the proposed homes would be affordable housing.

The applicant has failed to establish that sufficient state-school places would be available when the development is occupied or that necessary additional provision would be funded and delivered.

The same concern applies to wider community infrastructure. The possibility that proposed commercial floorspace could accommodate healthcare services is not a commitment to provide a GP surgery. The applicant has failed to demonstrate that the necessary education, healthcare and transport infrastructure can support the full development proposed.

These shortcomings are particularly relevant to NPPF Policies GB7 and GB8, which require consideration of infrastructure capacity and necessary improvements.

Failure to assess the maximum development sought

The application seeks outline permission for up to 250 dwellings and substantial additional non-residential floorspace. The applicant has not convincingly demonstrated that the combined landscape, transport and infrastructure effects of the maximum amount of development have been assessed.

Nor has it demonstrated that its traffic and environmental assessments adequately reflect the full range and maximum scale of commercial, nursery and care uses for which permission is sought.

The applicant must establish that the development proposed is acceptable in principle at this stage. Fundamental consequences of its location, scale and nature cannot simply be left to reserved matters.

The Parish Council considers that the applicant has failed to demonstrate that the full development sought is acceptable.

Ecology, biodiversity and drainage

The applicant's ecological evidence confirms the loss of existing arable land, grassland and scrub within the western development area and increased artificial lighting and activity near established wildlife corridors. Further bat-roost surveys remain identified in the ecological assessment, and inconsistencies exist between the site areas and open-space figures in the ecological documents and the application.

The applicant has not consistently demonstrated that the claimed biodiversity outcomes relate to the full development now proposed.

Although biodiversity improvements are proposed on the eastern land, these do not remove the permanent landscape harm or automatically compensate for the loss and urbanisation of the western countryside.

The site also includes sloping land, lower-lying areas and watercourses associated with Chigwell Brook. The Flood Risk Assessment recognises surface-water flooding risks but leaves detailed hydraulic and drainage-network modelling to later stages. The applicant has not fully demonstrated how the maximum development sought would affect surface-water runoff, drainage capacity and flood risk to neighbouring and downstream properties.

These matters add to the Parish Council's concerns about the adequacy of the evidence supporting the proposed amount and location of development.

Overall objection

The proposal would cause substantial and permanent harm to a strategically important part of the Metropolitan Green Belt, creating a substantial finger of urban development extending into open countryside and weakening the protection of the remaining Green Belt bordering Greater London.

EFDC's own Green Belt evidence identified the relevant land as making a Strong contribution to Green Belt purposes and assessed the harm from its release as Very High.

The applicant has failed to provide a convincing justification for departing from those conclusions or for classifying the land as grey belt.

The Parish Council considers that the development is inappropriate under NPPF Policy GB6, that compliance with the exceptions in Policy GB7 has not been demonstrated and that very special circumstances sufficient to outweigh the substantial Green Belt harm have not been established.

The proposed 50% affordable housing and additional public open space are acknowledged as benefits, but 40% affordable housing is already required by the adopted Local Plan and the 50% contribution corresponds to the capped national Golden Rules requirement.

The provision of affordable housing does not override Green Belt policy or justify the permanent loss of land that performs an important strategic function in preventing urban sprawl.

Significant concerns also remain about landscape and visual harm, traffic congestion, sustainable transport, education, community infrastructure and the adequacy of the environmental evidence.

EFDC's own consultant has identified deficiencies in the information required to assess potential effects on Epping Forest SAC.

These objections concern the principle, location and scale of development. They are not matters that can simply be resolved through reserved matters, additional landscaping or planning conditions.

Chigwell Parish Council therefore **STRONGLY OBJECTS** to application EPF/0729/26 and requests that Epping Forest District Council refuse outline planning permission. The Parish requests an invitation to make representations should this matter be considered by at Committee level