

APPENDIX 1
Completed Response
to
London Borough of Waltham Forest
Development Management Policies
Consultation

Open Spaces Department
Sue Ireland BSc, MSc, MIPGS
Director of Open Spaces

Mr Gordon Glenday
Head of Planning Policy and Regeneration
Sycamore House
Waltham Forest Town Hall
Forest Road
London E17 4JF

Telephone 020 8532 5305
Fax 020 8508 2176
Email sue.rigley
@cityoflondon.gov.uk

Our ref LBWF/DMP

Date 17 September 2012

Dear Gordon,

**LONDON BOROUGH of WALTHAM FOREST
DEVELOPMENT MANAGEMENT POLICIES CONSULTATION
RESPONSE of the CONSERVATORS of EPPING FOREST**

The Conservators of Epping Forest wholeheartedly welcome and support the Core Strategy (CS) Objectives and Policies upon which the Development Management Policies (DMPs) are founded. The Conservators also support the general approach taken to drawing out the DMPs from the CS and the justifications for the range and scope of the DMPs. In particular, the Conservators welcome the inclusion of Policy DM42 specifically recognising the strategic importance, contribution and significance of Epping Forest in the Borough.

In the **Appendix** to this letter we set out our detailed comments on the DMPs and the accompanying *Justification* texts. These detailed comments have already been submitted online through the LBWF Planning Portal and are brought together here to provide a comprehensive overview of the Conservators' submission.

We look forward to your Council's response to our submission and to further refinement of the DMPs, which we hope will provide the basis for a fruitful working partnership aimed at protecting and enhancing Epping Forest.

Yours sincerely

Paul Thomson
Superintendent of Epping Forest

Appendix –Response to LBWF’s Development Management Policies Consultation

DM13 - Issues

Correction to Green Box

The Strategic Objective should be no. 5 not 6.

Para 14.4

In the Conservators' view the protection of the Green Belt is of key importance, particularly given the limited number of green and open spaces in the Borough and the imperative to protect and buffer Epping Forest SAC. We welcome Policy DM13A which seems unequivocal but we are concerned that para 14.4 somewhat undermines this where it states:

"Although most development will not normally be acceptable in the Green Belt and MOL, there may be exceptions where the development is necessary."

The paragraph then goes on to define the exceptions which relate to ancillary facilities such as changing rooms and storage. However, the Government's NPPF is clear that ancillary facilities as exceptions should not be allowed unless there are very special circumstances. We are concerned that open space is at such a premium in the Borough and may be important in protecting the Forest's "natural aspect" that para 14.4 should not be interpreted as allowing buildings into open space which would intrude upon or adversely affect the boundaries or character of the Forest and might contribute to increased disturbance.

Policy DM14 comments

DM14H

The Conservators warmly welcome the support of the Council as the Competent Authority in seeking to reduce the impacts of air pollution on Epping Forest in relation to development proposals.

Para 15.1 Issues

The Conservators of Epping Forest have developed a Forest Transport Strategy (FTS), which is currently being implemented within the Essex County Council area of the Forest. The Conservators have been seeking the adoption of this FTS by the Council and have been discussing options such as enhanced crossing points, speed limit reductions and gateways/zoning with Council officers since 2008 with some progress on schemes in Forest areas such as along Rangers Road in Chingford. We would now wish to further refine existing proposals and develop new proposals with Council officers with the aim of the adoption of a Borough Forest Transport Strategy by the Council.

Para 15.1 Proposed changes

We would request the addition of a new 3rd sentence to be inserted between the current 2nd and 3rd sentences as follows:

"In seeking to protect and enhance the green corridor of Epping Forest (see Policies DM36 and DM42) the Council will seek agreement with the Conservators of Epping Forest on a Forest Transport Plan that will aim to enhance the visitor experience and access into the Forest whilst reducing the impact of air pollution, traffic and roads on the internationally-important Forest environment."

In addition to adding this sentence to para 15.1 we would request that consideration be given by the Council to adding a Policy DM14I specific to the protection of Epping Forest to the blue Policy box below para 15.2.

Para 15.23 Issues

Para 15.23 provides a welcome statement of the problems in conserving Epping Forest and reducing the impacts of air pollution on this internationally-important site. We would request an additional sentence to reflect the current situation.

Para 15.23 proposed changes

We would propose the insertion of the following sentences as new 2nd and 3rd sentences of the para 15.23:

"Recent scientific research carried out by Imperial College London and the Conservators of Epping Forest, found that nitrogen deposition across all areas of Epping Forest within the Borough exceeds the Critical Load for the Forest habitats. Therefore, any further significant increase would not be sustainable for the favourable condition of the Forest and reducing the levels of air pollution should be the long-term aim in the Borough."

Policy DM25 Environmental Protection - comments

DM25 Issues

The Policy wording as currently set out does not make clear the need for the protection of the Epping Forest Special Area of Conservation (SAC) from air pollution. This should be included here, as it has been in other policies in the DMP, because of the Council's duty as a Competent Authority to ensure Appropriate Assessment of any developments considered likely to have an adverse impact on the integrity of the Forest. Given that the nitrogen deposition Critical Loads and the Critical Levels of air-borne nitrogen oxides are exceeded in the Forest any additional air pollution is likely to have an adverse impact on the integrity of the Forest vegetation and soils.

DM25 – changes proposed

In DM25C we would suggest the insertion of a new 2nd sentence to read:

"Any new development that may generate pollution that would adversely impact on Epping Forest SAC or add 0.1kgN/ha/year to the Critical Load of nitrogen deposition on the Forest would be subject to an Appropriate Assessment by the Council as the Competent Authority under the Conservation of Habitats and Species Regulations 2010."

Policy DM25 para – 26.8 Issues

This paragraph, in our opinion, needs further explanation of the context for the protection of Epping Forest from air pollution.

Policy DM25 para – 26.8 proposed changes

We consider that the penultimate sentence should be expanded to read:

"In particular, any negative impact on Epping Forest Special Area of Conservation (SAC) will need to be minimised in accordance with the protection to its integrity under the Conservation of Habitats and Species Regulations 2010. An Appropriate Assessment may need to be carried out by the Council as the Competent Authority to determine if air pollution would adversely affect the Forest and if so what measures would need to be taken to prevent this adverse impact including refusal of planning consent."

Policy DM36 –Biodiversity - comments

DM36 Issues

The Conservators of Epping Forest welcome Strategic Objective 5 and the accompanying Core Strategy Policy 5 (CS5), which they consider comprehensive, robust and clear. However the Development Management Policy DM36 does not seem to fully incorporate the key aims of CS5 and does not seem to make clear links back to CS5 or to national policy. For example, in DM36A only SINCs are cited in relation to development. In DM36B & 36F mitigation is not included and the legislative framework within which planning decisions affecting biodiversity are made is not set out.

DM36 – Proposed changes

DM36A needs to make clear the whole range of site designations within the borough and specifically needs to emphasise the importance and legal protections for the Epping Forest Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI). The policy should make clear the steps involved in the consideration of development proposals that may adversely affect the SAC and SSSI areas. As stated clearly in the CS5 London Borough of Waltham Forest is the Competent Authority under Part 1 Regulation 7 of the Conservation of Habitats and Species Regulations 2010 (the Habitats Regulations 2010). As such LBWF is required, subject to certain exceptions, to revoke, restrict or refuse planning permissions that would adversely affect the integrity of Epping Forest SAC. To enable decisions to be made LBWF as competent authority may seek guidance of other authorities such as Natural

England and may require an Appropriate Assessment to be carried out. The protection of the SSSI is also stronger than that covering SINCs and this needs to be stated as it must affect how LBWF examines development proposals that might affect Epping Forest. Although LBWF's role as a Competent Authority is clear in the Core Strategy, in the DMP it is not referred to in either the Policy DM36 or the subsequent Justification section.

In terms of enhancement of biodiversity Section 40 of the Natural Environment & Rural Communities Act 2006 places a duty on public authorities to have regard to conserving biodiversity. This legislative pillar should be referred to in DM36A in our opinion to make it clear the key importance attached to ensuring that the cumulative affect of developments should not further reduce or compromise wildlife that is at risk. As the draft DMP states in para 37.2 the borough "contains one of the highest percentages of priority species and habitats in London" and these are priority precisely because they are rare, limited or vulnerable to threats from development or land management changes. The *Justification* for DM36 expresses this well in paras 37.5 and 37.6 but this does not seem to have been incorporated effectively into the wording of the Policy DM36.

This gap between the *Justification* text and that within the Policy DM36 is also apparent in DM36B and DM36F where mitigation measures need to be emphasised, as they are in DM36G. We would suggest that in DM36B the sentence is added:

"...where retention, restoration or enhancement measures are not considered possible mitigation and compensation measures should be clearly set out with supporting evidence for their effectiveness and relevance in relation to supporting the specific biodiversity value of the borough and its key international sites".

For DM36F it should emphasise more clearly, in our view, that if protection and enhancement are compromised, particularly in relation to green corridors linking to Epping Forest, that replacements are sought. There is much evidence for the importance of green corridors and a network of green islands in supporting biodiversity and also mitigating the impacts of climate change and pollution. Scientific research work on birds has shown that species richness in urban areas is strongly affected by tree numbers and distribution and there have been similar findings for bats and other protected species. Research has also shown clearly how trees ameliorate the impacts of air pollution on people living in cities. Establishing corridors and links with suitable native trees would improve the environment for local people significantly and help to "buffer" and support Epping Forest's biodiversity.

DM36 - Para 37.5 – comments and proposed changes

The Conservators of Epping Forest support the approach of this paragraph but consider that more emphasis needs to be placed on the legislative requirements for protecting biodiversity.

A suggested change to the text could be:

"Waltham ForestWhen assessing planning applications LBWF must discharge its duties as a Competent Authority in assessing potential development impacts in relation to Epping Forest SAC and will also have regard to its duty under the NERC Act 2006 to conserve biodiversity across the borough and, in particular, where such conservation is likely to enhance the biodiversity of Epping Forest SAC/SSSI."

Policy DM42 – Epping Forest **DM42 Issues**

The Conservators of Epping Forest wholeheartedly welcome the inclusion of this specific Epping Forest policy in the DMPs. However, in line with our comments on the Biodiversity Policy DM36 there are some modifications and additions that we consider essential.

Firstly, in the Strategic Objective box it is wrongly assigned as 6 rather than 5, which it now is. Further in paragraph 43.1 it needs to state clearly the full legal protection that the Forest enjoys as the DMP text currently only states that Epping Forest is a Site of Nature Conservation Importance in the borough - which is an inadequate summary of the site's significance, which elsewhere in the Core Strategy is accurately conveyed.

Secondly, in para 43.1 the sentence does not express the City of London's legal title correctly.

In paragraph 43.1 it needs to state clearly that although LBWF does not control Epping Forest, in relation to development proposals LBWF is the Competent Authority under the Habitat Regulations 2010 and needs to work closely with both the Conservators and Natural England in order to ensure the protection of the Forest from development.

In the Policy box the title Policy DM42 needs to be inserted.

Policy DM42A does not accurately reflect the Council's role in the protection of Epping Forest

In Policy DM42C the size of Epping Forest needs to be stated which provide a clear justification for the inclusion of a specific Epping Forest Policy in the Local Plan.

The Epping Forest long term management objectives stated are those of the 1998 Epping Forest Management Plan. These have been updated into 8

Objectives under the current management plan that was approved by the Conservators in 2004 and we would ask that these current 8 Objectives are substituted in the Policy DM42 - and these are given in the box below.

DM42 Proposed changes

Strategic Objective 5 needs to be inserted in the green box.

In paragraph 43.1 substitute "City of London Corporation as the Conservators" for Corporation as this is the correct legal title of the Conservators' parent body.

In 43.1 the opening sentence should read:

"Epping Forest as a Special Area of Conservation, Site of Special Scientific Interest and Site of Nature Conservation Importance is not controlled....."

Following this corrected sentence we request that a further sentence be inserted that reads:

"The Council is however the Competent Authority in relation to Epping Forest SAC under the Conservation of Habitats and Species Regulations 2010 and will discharge its duties by ensuring that it undertakes Appropriate Assessments of development proposals where necessary and works with other competent authorities and the owner to ensure the protection of the integrity of the SAC."

For DM42A it should state: "The Council, as is its duty as Competent Authority, will resist development that would compromise or adversely affect the integrity of Epping Forest SAC and will work closely with the Conservators of Epping Forest and other competent authorities to promote the conservation and enhancement of the features of interest and, more broadly, provide support to ensure that the green corridor for people and wildlife provided by Epping Forest's SAC/SSSI/SINC areas is integrated with and connected to other areas of nature conservation in the borough to ensure improved sustainability of protected species populations and habitats across the whole area."

In DM42B this should be re-phrased in the light of the fact that Epping Forest is an open space with entirely open public access protected by Act of Parliament. We suggest:

"The Council will seek to ensure that any Improved facilities incorporate design features that reduce the impacts of disturbance, reduce the potential for damage to and raise awareness amongst the visitors of the nature conservation interests of the Forest to the maximum extent possible and in proportion to the likely impact of the facilities."

In DM42C we would recommend that it is changed to read:

"In the light of the significance of Epping Forest as the largest area of open space in the borough (36% of all the borough's open space area), the

Council supports the Epping Forest Conservators in their efforts to increase the range and quality of the leisure and amenity provision for visitors, including local residents, in line with the latter's duties to provide for "recreation and enjoyment" of the Forest and subject to their compliance with the other policies of the Council within this plan."

In addition we would request that the following Epping Forest Management Plan Objectives are substituted in DM42C with the following current 8 Epping Forest Objectives:

"Resources: To ensure the best use of resources and the effective engagement of staff and others in the protection and conservation of the Forest as a unique open space;

Protection: To safeguard the physical and biological integrity of Epping Forest as a unique public open space and internationally-important site together with its protective Buffer Lands;

Access: To provide for the sustainable use of the Forest for the recreation, enjoyment and education of all;

Heritage: To preserve and interpret the varied heritage of the Forest for the education and interest of all;

Trees: To conserve the Forest's ancient pasture woodland and neighbouring wooded areas in a favourable condition;

Open Land: To enhance the mosaic of open habitats through extensive grazing, mowing and cutting, so as to encourage a varied sward together with a diversity of native flowering shrubs;

Wetlands: To maintain and enhance the network of ponds and bogs, streams, ditches and their banks for wildlife and amenity;

Monitoring: To maintain and enhance the diversity of wildlife in the Forest and its Buffer Lands by monitoring and responding to change and by regular auditing of the impacts of our management work."

DM42 – para 43.2 – Issues

In line with our comments above on Policy DM42, paragraph 43.2 needs to set out clearly the legislative context in which the Council is acting. This paragraph also ought to re-emphasise the significance of the green corridor to the borough.

DM42 – para 43.2 – proposed changes

Para 43.2 should include reference to the Habitat Regulations 2010 and to the status of the Council as Competent Authority for the SAC.

In Para 43.2 a second sentence could be inserted after the current opening sentence to state that :

"Epping Forest covers 11% of the whole borough area and provides a continuous coherent open space for the whole of the borough's eastern edge from south to north. It represents 36% of the borough's public open space and its protection is of immense importance to the protection and enhancement of the value and character of all the smaller open spaces nearby."

DM42 – para 43.6 Issues

Para 43.6 is not accurate and should be re-phrased.

DM42 – para 43.6 – proposed changes

We would suggest the following re-phrasing of para 43.6:

"Parts of the Forest in the north of the Borough are larger and surrounded by a lower density of residential properties and as a result are less intensively used. However, they are all accessible by public transport, by both bus and train, and in Chingford, within a short walk of the railway and bus stations and a local bus stop, at the northerly most point of the Borough, a new visitor, interpretation and education centre with cafe opened in July 2012 providing enhanced facilities for visitors and providing a gateway into the Forest and the Borough's open spaces."

We would also request that a map of Epping Forest, its facilities and the public transport links is provided in your final DMP. The Conservators can supply a map based on OS mapping which the Council could use under its Copyright Licence from the OS.

-----oo00oo-----

APPENDIX 2
Response
to
Epping Forest District Council
Community Choices
Issues & Options for the Local Plan
Consultation

Chairman Epping Forest and Commons Committee

Alderman Gordon Haines

John de Wilton Preston
Director of Planning and Economic Development
Epping Forest District Council
Civic Offices
High Street
Epping
Essex CM16 4BZ

Date 15 October 2012

Dear Sir

EPPING FOREST DISTRICT LOCAL PLAN PUBLIC CONSULTATION on ISSUES & OPTIONS: OPTIONS for GROWTH RESPONSE of the CONSERVATORS of EPPING FOREST

The Conservators of Epping Forest are charged with the duties and responsibilities for conserving and protecting Epping Forest under the Epping Forest Act 1878. The Conservators are constituted as the Mayor & Commonalty of the City of London, owners of the Forest, whose full authority as the Conservators under the Act is vested in the Epping Forest & Commons Committee of which I am the Chairman.

We welcome the opportunity to comment on the Council's *Issues & Options* consultation document. The Conservators regard this document as crucial to the long-term protection of Epping Forest, its designated SAC/SSSI areas and its surrounding built and natural landscapes, with which it is still intimately linked. Epping Forest Land covers 5% of the District and, therefore, should be one of the fundamental building blocks around which the Local Plan is structured.

Epping Forest is a major public recreation and tourism destination for London and Essex. The Forest's 9.2 square miles receives some 4.3 million visits each year and makes a major contribution to the provision of public open space in Epping Forest District. Much of the Forest's appeal is associated with its natural character protected under its dedicated Parliamentary protection – the Epping Forest Acts of 1878 and 1880.

The Forest is also an internationally important IUCN Category IV Protected Area, consisting of significant areas of land protected by Site of Special Scientific Interest (SSSI) status under the Wildlife and Countryside Act 1981 (as

amended under the Countryside & Rights of Way Act 2000) and Special Area of Conservation (SAC) designation under European Union Council Directive 92/43/EEC on the Conservation of Natural habitats and wild fauna and flora, which is now transposed into UK law as the Conservation of Habitats and Species Regulations 2010.

This is the context which shapes our response to the Options for Growth and we reiterate our support for the protection of the Green Belt that your Council has ensured over the last 20 years. We consider that the Green Belt is vital for the protection of the Forest and its links to the surrounding countryside. The Green Belt has been vital for reducing the pressures on the Forest and any future Local plan must address itself to enhancing its natural beauty and biodiversity.

In our response attached to this letter we emphasise the importance of the Council's role as Competent Authority in assessing the impacts of development on the SAC. In addition to this reactive role we also request that the Council considers its proactive role in protecting the Forest and its surrounding historic treed landscape. We suggest that the Council develops robust green infrastructure and networks of open space for wildlife and access and ecosystem services

We hope that our detailed response (attached) will be the beginning of a dialogue with the Council over the period of the development of the Local Plan so that we can act in partnership to secure the protection and enhancement of the Forest as a unique landscape.

Yours sincerely

Mr Gordon Haines
Chairman, Epping Forest & Commons Committee

**Detailed response of the Conservators of Epping Forest
to the EFDC Community Choices - Issues & Options Consultation Sept 2012**

Section 2

Question 2 – Vision and aims

We believe that the Vision and aims need to be developed to be bolder and more clearly interlinked. In particular, we consider that the first aim should include development of policies that secure the strongest possible protection for Epping Forest and its associated Buffer Land, together with its 1882 Arbitration Award responsibilities.

There should also be reference to the development of a robust, extensive interlinked green infrastructure that would provide protection for the Forest and other key sites and provide benefits for both people and wildlife. For defining green infrastructure the Conservators support the Natural England/CPRE definition in Green Belts – a greener future - *‘A network of green spaces which provide life support functions including food, fibre, air to breathe, places for nature and places for recreation. The Green Infrastructure approach seeks to use regulatory or planning policy mechanisms to safeguard natural areas. Multi-functional green infrastructure refers to different functions or activities taking place on the same piece of land and at the same time. For example, a flood plain providing a repository for flood waters, grazing land, a nature reserve and a place for recreation’.*

At the moment the aims seem to sit rather separately from each other and it is not clear how potential conflicts would be tackled. We do, however, support the order of the aims listed and welcome the apparent prominence given to the protection of the Green Belt and the natural and built heritage.

-----oo00oo-----

Section 3.

Green Belt and natural and built heritage

General comment on Section 3 of Document

Before addressing the specific questions asked under Section 3 there is a need to examine the context provided by Section 3, in which those questions have been raised.

Epping Forest Land, under the Epping Forest Act 1878, covers 5% of the District – as much area as covered by the built environment of Loughton, Chigwell, Buckhurst Hill and Waltham Abbey combined. With its Buffer Lands the protected areas cover over 7% of the District. Epping Forest is also a nature conservation area of international importance (Special Area of

Conservation) and of huge strategic significance for the District as a place of recreation and tourism with over 4.3 million visits a year.

Each of the towns and villages receive a separate section of description of their key features (paras 2.23 – 2.58 inclusive). However, Epping Forest, despite its status and significance to the District, receives only passing mention in paragraphs 2.21, 2.26, 2.35 and 3.3 with little explanatory context. In the following Diagram 3.1 the Forest is not even referenced in the accompanying key. The identification of the issues, therefore, is in our view incomplete and the context within which they are framed is inadequate, failing to make clear how the strategic area of the Forest might shape policy.

We believe these are critical omissions by the Council in the current consultation and we request that they are covered in the forthcoming Local Plan. Policy should be shaped by the strategic significance of the Forest and the protection of Epping Forest is a fundamental issue for the Council. It is one that needs to be addressed directly and clearly by ensuring the Forest is a key strategic area in the Local Plan. Given the growing development pressures it is essential, in our view, that policy in relation to the Forest should be strengthened.

The Council's duties as the Competent Authority for Epping Forest, in relation to development control, under Part 1 Regulation 7 of the Conservation of Habitats and Species Regulations 2010 (the Habitats Regulations 2010) need to be set out. There should a separate section on Epping Forest providing context for and explanation of the way in which its future will be secured and its biodiversity enhanced.

Proposed future Policy for Epping Forest's natural heritage

The current Plan Policy HC5 for Epping Forest should be updated with a strengthened and broader wording to reflect the enhanced duties of the Council and the increased threats to the integrity of the Forest. We would suggest that a new specific Policy for Epping Forest could be worded along these lines:

"The Council is one of the Competent Authorities in relation to Epping Forest SAC under the Conservation of Habitats and Species Regulations 2010 and will discharge its duties by ensuring that it undertakes Appropriate Assessments of development proposals where necessary to ensure the protection of the integrity of the SAC. More specifically, the Council, as is its duty as Competent Authority, will resist development that would compromise or adversely affect the integrity of Epping Forest SAC and will work closely with the Conservators of Epping Forest and other competent authorities to promote the conservation and enhancement of the features of interest. More broadly, the Council will provide support to ensure that the green corridor for people and wildlife provided by Epping Forest is integrated with and connected to a network of other areas of nature conservation in the District. Such support, as well as sustaining the Forest, will aim to provide the full

benefits to local people of open and accessible countryside whilst ensuring improved sustainability of protected species populations and habitats across the whole area."

This informs our responses to the specific questions posed in Section 3.

Questions 3 – 8 – Green Belt and natural heritage

Question 3 - Issues– our answer to this is that we do **not** consider that all the relevant issues have been addressed. An explanation as to why is given below.

In relation to biodiversity and wildlife sites the 6th bullet point beginning “*The NPPF...*” (page 16) is, in our opinion, entirely wrong. Having quoted the NPPF the conclusion is drawn that: “In reality, this means that local wildlife sites cannot receive much protection under the planning system”. Firstly, in order to plan for biodiversity at a landscape scale (NPPF para 117), there need to be biodiversity “source” sites to allow the spread of species across a landscape, and it will need “stepping stones” and “local ecological networks”. Local wildlife sites are essential elements of ecological networks often supporting species that are locally rare and would otherwise die out in the District. These sites are also key to supporting widespread species that are in severe decline, such as many farmland and woodland birds whose populations have fallen drastically over the last 40 years.

A good example of such a site is Fernhills, a 12ha site purchased in 1997 by the Conservators, situated to the east of the Sewardstone Road (A112) on Lippitt's Hill and now incorporated into the Forest. This site is not part of the SSSI designation having been purchased after the re-notification in 1990. It has, however, long been a local wildlife site and today supports the Forest's, and indeed the District's, largest population of Adder's tongue (a fern), a species with few remaining sites in eastern England. The site combined with adjacent Buffer land and the nearby privately-owned land is an essential hunting area for Barn Owls (a Schedule 1 species) and is a key area for Cuckoos (a species that has declined by 80% since the 1970s) to breed in because of the extensive mixed scrub habitat.

If such Local Wildlife Sites and groups of sites are not protected then this would be quite clearly going against one of the 12 ‘core principles’ embodied in the NPPF that, inter alia, states that planning should: “contribute to conserving and enhancing the natural environment....”. This policy guidance, of course, stems directly from legislation in the form of the Natural Environment and Rural Communities (NERC) Act 2006 Section 40. This states that each public authority has a duty to conserve biodiversity. In Section 40(3) it is further clarified that this includes “restoring and enhancing a population”. The NPPF picks up this theme in para 117 by stating that planning policies should “promote the preservation, restoration and re-

creation of priority habitats, ecological networks..." and, crucially, the "recovery of priority species populations, linked to national and **local** targets.." (our emphasis in bold). This gives local wildlife sites considerable protection as part of ecological networks.

The Council's statement in the current document is tantamount to the abandonment of protection for these sites and to the reversal of its duty under the NERC Act 2006. The Conservators of Epping Forest cannot protect the Forest as an "island" in a sea of degraded landscape. Many of the recent recoveries of Forest fauna have been driven by expansions of wildlife across the existing ecological network, including Badgers, birds like Buzzards and Barn Owls, Ringlet and Purple Emperor butterflies.

Question 4 – Options – our answer to this is that we do **not** consider that all the relevant issues have been addressed. We consider that there are problems apparent in the way in which the issues are set out in the document. In fact we consider that the *Issues & Options* document is misleading in that it fails to mention the fundamental aim of Green Belts outlined in paragraph 133 (page 35) of the NPPF '*the fundamental aim of the Green belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green belts are their openness and their permanence*'.

Epping Forest stands in the vanguard of the Green Belt movement having been one of the key inspirations for the Metropolitan Green Belt as advanced by the Greater London Regional Planning Committee in 1935.

The Conservators are therefore particularly keen to maintain Green Belt that protects the context and setting of Epping Forest as a place where the modern concept was first inspired.

The protection of the Green belt has enjoyed strong cross-party consensus for the past 65 years, including reassurances during the recent Party conference season from the Secretary of State. Since 1959, the Conservators, for our part, have sought to further protect Green Belt land by acquisition as part of our 'Buffer Land' policy to protect the context and setting of Epping Forest. In 1974 the Greater London Council also supported this approach by purchasing and dedicating country estates adjoining the Forest under The Green Belt (London and Home Counties) Act 1938. The Conservators now own and administer the former GLC acquisitions. Many of these early acquisitions have now become 'strategic gaps' in the Local Plan proposals

Question 5b and Question 6 – the concept of the Green Arc

In response to question 5b we would like to see the concept of Strategic Green Belt corridors added to the concept of Strategic Gaps of Diagram 3.1 in recognition of the need to sustain an ecological network and to support and protect the Forest and its environs. For example we propose that the

western flanks of the Forest alongside the Sewardstone Road be recognised as a key area for biodiversity and a key area for the protection of the Forest.

The Conservators strongly urge the Council to adopt the concept of the Green Arc and to actively seek to support links between Lea Valley and Epping Forest and other sites (see also Question 8 below).

Questions 5e and g

Development of urban green-space is likely to be a retrograde step and so 5g is preferred to 5e. Urban green-space plays a critical role in people's quality of life. The Woodland Trust, amongst others, has compiled considerable scientific evidence to demonstrate this in its 2011 report on the State of the UK's forests, woods and trees.

Question 8 – biodiversity options

These are not adequately addressed in our opinion and as such should already be clear from comments above. The 4 bullet points of options are currently weak and suggest that the Council would take an indirect and/or minimalist approach. The first bullet point concentrates on mitigation and compensation rather than protection and enhancement of biodiversity which the NERC Act 2006 makes clear is the duty of a local authority. In the face of declining biodiversity this does not seem sufficient and with the need to protect irreplaceable features in the wider countryside, like the District's significant population of ancient and veteran Oaks, a stronger policy on biodiversity we believe is required.

The other bullet points' emphases on "investigate", "encourage" and "monitor" suggest very limited and indirect engagement with biodiversity in the forthcoming Plan. Given the NERC Act 2006 duty, and the importance of the Forest to the District's quality of life and overall character, a more proactive and direct approach is suggested. In the Conservators' view the protection of the Green Belt is of key importance with the imperative to protect and buffer Epping Forest SAC.

We consider that the Council's approach is important in directly enhancing the wildlife links between the Lea Valley and Epping Forest and, indeed, towards other sites like Hainault Forest. The Conservators consider that the Council should play a critical role in promoting green infrastructure (see definition given above on page 1 of this response) and enhancing such links around the Forest.

Question 11

Option 11a preferred

As with so much else in Section 3 of the consultation document we would favour the approach of managing areas and landscapes as a whole. This requires conservation character assessments to be made to avoid the reduction of places into component parts and the weakening of protections

from inappropriate development. It also allows the built heritage and the natural heritage, particularly the treed landscape, to be integrated. This is vital around the Forest boundaries where the conservation areas play an important role in maintaining the links and connections between Forest and the wider countryside (e.g. Copped Hall, Bell Common CAs).

-----oo00oo-----

Section 4 Options for Growth

Protection of the Green Belt around the Forest

At this point the Conservators would wish to re-state their support for the full protection of the Green Belt and their opposition to its fragmentation and its development, especially around the Forest.

The countryside beyond the Forest boundaries evolved over many centuries with the Forest and represents a landscape of great historic and cultural value. This landscape includes linking Green Lanes, ancient and veteran trees, ancient woodlands including the purlieu woods beyond the Forest's Purlieu Bank, which itself still survives both within and beyond current Forest Land boundaries, networks of old paths and byways and other important features. This boundary of protective Green Belt, with its actively farmed land, is also of great importance for supporting and protecting the Forest's 'natural aspect' (for which the Conservators are responsible under the Epping Forest Act 1878), its tranquillity, its air quality (see our responses to Section 7 below) and its biodiversity.

As the Secretary of State for the Environment stated in 1986 in his decision to transfer the Warlies Estate to the Conservators:

"The Secretary of State considers that the historical links of these 1938 Act holdings (the Estate) with Epping Forest.....and the important ecological connections between them make it desirable that the management of these areas of land should be harmonised, so that each can be managed and maintained in accordance with the requirements of their particular Acts, for the greater benefit of both."

The Council actively campaigned for and fully supported this decision and the Conservators' ownership of this land. These opinions of the SoS still hold today for the wider area of Green Belt around the Forest and, in fact, are even more relevant due to losses elsewhere and the building of the M25. The Green Belt is important beyond the Buffer Land areas as the landscape protection and ecological connections cannot be confined to such parcels of land. A good example is provided by the Cobbins Brook valley which is an extremely important, relatively unspoilt floodplain landscape covered by multiple ownerships.

The need for Strategic Green Infrastructure

The Buffer Lands managed by the Conservators should be regarded as Strategic Green Belt gaps or Strategic Green Infrastructure in their entirety (i.e. adoption of a Green Arc policy – see comments below), rather than only some being selected (e.g. North Farm as selected in Diagrams 3.1 and 4.9). Strategic Green Belt ‘corridors’ and wildlife networks are required to retain a diverse, functional and accessible countryside with which the Forest needs to be linked. The Conservators would ask that the Council, in developing its policies, adopts the Epping Forest Management Plan Vision and, in particular, 2 of its 5 key points:

- *“Epping Forest’s position as a unique and ancient landscape for people and wildlife will be strengthened”;*
- *“Epping Forest will be highly valued as part of a larger and fully accessible protected landscape area”.*

The Green Arc and the “duty to co-operate” to protect Epping Forest

In order to make this vision a reality and in order to adequately protect the internationally important Special Area of Conservation at Epping Forest, which is a bigger issue than the District alone can tackle, we consider that the Council must adopt proactive, protective policies involving other authorities. Such an approach would be in line with paragraphs 113, 114, 117 and 157 of the NPPF and the requirements of Section 110 of The Localism Act 2011. This would include continuing its involvement and support for the Green Arc and embedding this approach in its protection of Green Belt land around the Forest.

The *Green Arc* Partnership was launched in 2003 to strengthen and link green spaces around the Forest, across the District and between local authorities. It is a particularly good example of co-operation aimed at protecting and linking an ecological and access network at a landscape scale. Both Epping Forest District Council and Essex County Council have been supportive and engaged with the partnership. The development of the Local Plan, in our view, provides a significant opportunity to consolidate the Green Arc vision and co-operative approach as policy and we believe this is a key role for the Council.

It is in the context of, and without prejudice to, the Conservators’ objection to the development of Green Belt land around the Forest that the following comments are now made with regard to the proposals for growth set out in Section 4 of the consultation document.

-----oo00oo-----

Comments on the Section 4 Diagrams

Before commenting on the specific proposals around existing centres of development we must point out that the maps that have been used are inaccurate and, as with Diagram 3.1, do not highlight the importance of the Forest. The Forest areas shown in dark green on the maps seem to have been extracted from rudimentary maps of the more densely wooded areas of the Forest and do not represent the boundaries of the Forest. For example, in Diagram 4.12 Bell Common and Sheppard's Meadows are not represented at all. It is clear also that other wildlife sites, including Buffer Lands, are not indicated on the maps – including on Diagram 4.12 again in which Swaines Green is not shown on the western edge of Epping despite being an important part of the Buffer Land of Epping Forest adjacent to the Forest's ancient Green Lane network. Such inaccuracies and omissions fail to provide the full context for the proposed growth areas and, thereby, any potential for strengthening the green infrastructure and protecting ecological networks seems to be completely overlooked.

Diagram 4.1 (page 43) Harlow Options for Growth and Question 16

As well as opposing the development of Green belt around the Forest the Conservators remain concerned about the potential for proposed development at Harlow which may have an adverse impact on the Forest. In particular, the generation of increased traffic heading into London through Forest roads seems a high probability without any concomitant adjustment of the road infrastructure.

Question 18 – comment on HAR-C

The Conservators are opposed to HAR-C in particular and believe that the strategic constraints listed in the accompanying **Table 4.10** should prevent this land from being developed. It would breach a key landscape ridge which would make the development prominent over a very large area of the District, including across the unspoilt Cobbins Brook valley and Warlies Estate. It would also be adjacent to Epping Long Green, which is Forest Land and which we regard as an important part of the District's strategic green infrastructure that should be strengthened by the protecting of additional neighbouring land on its flanks.

4.11 Transport Network Focus

The general approach to the location of any new development seems to involve large expansions of development immediately around the north of Epping Forest because of the concentration away from rural areas. The consultation document neither takes sufficient account of the extra traffic generation due to the additional housing provision nor the inadequate transport networks into which such provision would be placed. There is no clarity about the major movement corridors and this must be a key consideration around these developments (see also carbon reduction comments below).

Such development, when taken together, may require an Appropriate Assessment to be carried out by the Council as a Competent Authority under the Habitat Regulations 2010. The Council would need to seek advice from and work with other Competent Authorities such as Natural England to consider the impacts of traffic growth on the Forest. In the discussion on page 54 this Competent Authority role is not mentioned and this seems to be an omission.

A key concern of the Conservators is that the proposed new developments will lead to a great increase of traffic through Forest roads. This would not be sustainable, in our view, as the Forest is already polluted beyond its capacity to absorb pollutants without further detrimental changes to its vegetation (Critical Load and Critical Levels of nitrogen pollutants are discussed under Section 7 below). Noise and disturbance are also key issues for maintaining the special nature of the Forest for wildlife and people. We consider that any growth proposals must be accompanied by a more detailed examination of transport options, road network capacity and traffic projections.

Diagrams 4.2 to 4.8 Spatial Options for Growth and Question 19

All of the options shown on the maps give considerable cause for concern, particularly as there seems to be no predictable pattern for future jobs growth, traffic growth patterns or additional infrastructure (e.g. roads) development. The inadequacy of the assessment of housing prevents a meaningful assessment in our view.

On the face of it Spatial Option 5 seems the least damaging of the options for Epping Forest, and the *Green Arc* area around it, but this is highly dependent on the improvement and development of a transport network that reaches out into the District. Without such improvement, traffic will increase towards Central Line destinations immediately around the boundaries of Epping Forest. The Forest is a constraint on the development of a car parking infrastructure.

There needs to be considerable focus on improving the transport network capacity, particularly for modal change in transport at transport hubs in the District. There is likely to be continuing and growing pressure for additional infrastructure beyond the boundaries indicated in the Settlement analyses shown in the remainder of Section 4.

Once the door is open on Green Belt development it seems unlikely to be closed in our view. This makes it all the more important to develop a robust strategic green infrastructure like the *Green Arc* with positive access and biodiversity features. A settlement analysis is not sufficient.

Spatial Options – Settlement analysis

Diagram 4.12 (page 95) Epping Options for Growth; Questions 35 and 36

In addition to our already stated objections to Green Belt development around the Forest the Conservators are particularly concerned about the proposals for growth in areas EPP-B, EPP-D, EPP-E, and EPP-F which lie close or adjacent to Forest Land and would be likely to lead to the deterioration of habitats through increased pressure and disturbance on the sites. The size of the infrastructure of EPP-D would result in a substantial shift in the “centre of gravity” of Epping Town and change its character whilst intruding against the ancient Green Lane and historic landscape of the area.

Diagram 4.17 (page 135)– North Weald airfield Options for Growth; Questions 51 to 57

Without the re-opening and development of the Central Line, links to the A414 or changes to the M11 any development here would have direct impacts on traffic growth in the Forest.

Diagram 4.19 (page 143)– Theydon Bois Options for Growth

The Diagram does not show the full extent of Forest Land or its Buffer Land. It also does not show the proposed 2nd Strategic Green Belt gap to the north of Theydon Bois and around the M25. THB-B would be of great concern to the Conservators as it is directly adjacent to Forest Land and would continue the erosion of the landscape around the Forest and intrude into its ‘natural aspect’. THB-C would represent a clear breach of the current village boundary envelope and would seem to open up the possibilities of a future much larger expansion of the village to the great detriment of the Forest’s landscape and “natural aspect”.

All the THB options are likely to generate considerable traffic through the Forest to Junction 26 of the M25 or into London, despite the Central Line station at Theydon Bois. This would increase pollution to the Forest habitats around the Wake Arms, including the features protected under the SAC designation.

Diagram 4.20 (page 147) Thornwood Common Options for Growth

As with North Weald development this development is likely to have a significant impact through the Lower Forest to the south. The Forest here has already lost some land to a flood alleviation scheme and further development in THO-B and THO-A seems likely to increase pressure for enhancements of the flood capacity and more potential damage to Forest Land around Thornwood Common.

The development of Randall’s Yard at THO-2 could remove a pollution and encroachment issue that has been a long-running concern for the Forest and has damaged its natural aspect and tranquility. However, residential development would have to be aimed at considerable enhancement of the

boundary with the Forest to prevent further degradation of an historic landscape boundary

Diagram 4.21 (page 153) – Waltham Abbey Options for Growth

We re-state our objection to the development of the Green Belt and these growth Options are of great concern to the Conservators because of their proximity to the important Buffer Lands and historic Forest Green Lanes. The Conservators strongly oppose development in WAL-C. WAL-C should in our view form part of a Strategic green belt Gap as it would be hard up against our Forest and Buffer Land boundaries and development here will further degrade the historic landscape of the Green Lanes and erode the green infrastructure around the Forest.

The requirement for infrastructure development on a large scale is ill-defined at present and is likely to raise further issues including the development of considerable traffic growth through the Forest on small roads of limited capacity. It is likely to significantly damage the rural character of Upshire and the surrounding Buffer Lands and increase disturbance to wildlife in the area.

WAL-D and WAL-E are also of major concern. They are along the Cobbins Brook valley which is a very important landscape and wildlife corridor that should in our view be protected as part of a Green Arc and provide flood storage capacity and other ecosystem services to Waltham Abbey town as a whole. If WAL-E were to be developed the flood alleviation scheme that has already intruded into the Cobbins Brook landscape might require further upgrading to the detriment of the natural beauty of the valley and at considerable extra cost.

The potential development proposed for WAL-G would extend any development land south of the M25 and breaching this boundary, besides building up considerable additional pressure along roads bounding and through the Forest, would seem to remove any restraining “envelope” around Waltham Abbey. It would be likely to encourage future attempts for “ribbon” development further south beyond the A121 and along the A112.

-----oo00oo-----

Section 7 Transport Access and Movement

Question 90 – Issues

Epping Forest Transport Strategy

The existence of the Forest Transport Strategy adopted by Essex County Council and the Conservators in 2008 should be acknowledged as an important issue that should shape the Council's approach to transport issues in and around the Forest.

Air pollution issues

The text in **para 7.2** does not make clear the need for the protection of the Epping Forest Special Area of Conservation (SAC) from air pollution. This should be included here because of the Council's duty as a Competent Authority to ensure Appropriate Assessment of any developments considered likely to have an adverse impact on the integrity of the Forest. Given that the nitrogen deposition Critical Loads and the Critical Levels of air-borne nitrogen oxides are exceeded across the Forest any additional air pollution is likely to have an adverse impact on the integrity of the Forest vegetation and soils.

Question 91 Options

Epping Forest Transport Strategy

The Options should include the formal recognition by the Council of the Forest Transport Strategy and we would further request that the Council considers adopting the Strategy insofar as it is able to implement or assist in the implementation or effectiveness of measures taken by Essex County Council and the Conservators, including:

- the development of "gateways" to the Forest;
- the reduction of the impact of traffic on the Forest;

and

- the encouragement and support for sustainable transport options such as the Epping Forest shuttle bus service that was started in 2011 and it is hoped will be continued from 2013.

Air pollution Options

The options under air quality and congestion are not sufficient in our view and the inadequacy of the housing assessment prevents a meaningful analysis in our view. We consider that an option should have been set out which would have led to a Policy compatible with the Council's duties under the Habitat Regs 2010 as follows:

"Any new development that may generate pollution that would adversely impact on Epping Forest SAC or add 0.1kgN/ha/year to the Critical Load of nitrogen deposition on the Forest would be subject to an Appropriate Assessment by the Council as the Competent Authority under the Conservation of Habitats and Species Regulations 2010."

In addition, the consequences of this policy for development proposals should be set out along these lines:

"Any negative impact on Epping Forest Special Area of Conservation (SAC) will need to be minimised in accordance with the protection to its integrity under the Conservation of Habitats and Species Regulations 2010. An Appropriate Assessment may need to be carried out by the Council as the Competent Authority to determine if air pollution would adversely affect the Forest and, if so, what measures would need to be taken to prevent this adverse impact, including the refusal of planning consent."

Such a policy approach has been adopted by other Councils neighbouring the Forest and we believe that policies must include robust, meaningful thresholds to pollution.

-----oo00oo-----

Section 8 Infrastructure and CIL

As emphasised already throughout our response, the provision of coherent, robust green infrastructure of high quality for access and wildlife is vital to the protection of the important wider Forest landscape as well as to the Forest itself. The second bullet point on page 187 should be expanded considerably to take on board the need to develop this green infrastructure and to identify linked sites within the *Green Arc* in particular.

For green infrastructure to be effective it must be strategically planned and coordinated with a strong master-planning element that will enable strategic connections to be achieved. In this regard the *Green Arc* represents a major opportunity to realise the early vision of the Green Belt movement and make valuable connections to the green infrastructure proposals made by neighbouring authorities.

Green space, and urban green space in particular, is hugely important for people's health and well-being and provides many ecosystem services including the removal of pollution. To make the most of CIL requires a green infrastructure strategy that other partners and stakeholders can sign up to.

-----oo00oo-----

Section 9 Responding to Climate Change

Question 93

We do not consider that all relevant issues have been listed. In particular, biodiversity is not emphasised such as the need for a robust network of wildlife sites to allow species to respond to change (e.g. fluctuating butterfly populations). The importance of good green infrastructure development to provide ecosystem services, like flood control, also needs to be promoted and the Council should be identifying these ecosystem services and how they will be provided more clearly as part of its policies.

The impacts of air quality and traffic pollution are somewhat separate from Climate Change and should be covered in Section 7. However, the severe impacts of drought on the Forest vegetation and other key green spaces should be an issue for the Council and, in our view, this requires the options being considered more carefully.

Question 94

For Carbon reduction we would request (as in our comments on Section 7 above) that the Council considers the adoption of the Epping Forest Transport Strategy and looks to have a strategy to reduce vehicle emissions in both urban areas and across the Forest.

We consider that the Council must make a stronger link, when considering carbon reduction, between housing numbers, their locations and the associated transport network. To ensure this is the case the carbon reduction strategy needs to play a much more visible role in the document and become an interlinking thread throughout it.

An option that needs to be included is that of Tree Strategies and their continued development and their focussing on ameliorating climate change. There is much evidence, compiled by amongst others The Woodland Trust recently, that demonstrates conclusively the value of urban trees for ameliorating the impacts of air pollution and climate change and providing support for wildlife. We would request that these are added in as options for mitigating climate change, including specifically the planting and/or encouragement and maintenance of self-sown, open-grown, native trees to enhance corridors and links around the Forest's boundaries. Such a strategy would help to provide successors, eventually, to the thousands of ancient and veteran trees in the District, which help to define the character of the place.

Options should also include the consideration of options for biofuel and how the District will respond to any wood-fuel, short rotation coppice area developments as these may have an impact on landscapes including conservation areas.

-----oo00oo-----

Section 7 Transport Access and Movement

Question 90 – Issues

Epping Forest Transport Strategy

The existence of the Forest Transport Strategy adopted by Essex County Council and the Conservators in 2008 should be acknowledged as an important issues that should shape the Council's approach to transport issues in and around the Forest.

Air pollution issues

The text in **para 7.2** does not make clear the need for the protection of the Epping Forest Special Area of Conservation (SAC) from air pollution. This should be included here because of the Council's duty as a Competent Authority to ensure Appropriate Assessment of any developments considered likely to have an adverse impact on the integrity of the Forest. Given that the nitrogen deposition Critical Loads and the Critical Levels of air-borne nitrogen oxides are exceeded across the Forest any additional air pollution is likely to have an adverse impact on the integrity of the Forest vegetation and soils.

Question 91 Options

Epping Forest Transport Strategy

The Options should include the formal recognition by the Council of the Forest Transport Strategy and we would further request that the Council considers adopting the Strategy insofar as it is able to implement or assist in the implementation or effectiveness of measures taken by Essex County Council and the Conservators, including:

- the development of "gateways" to the Forest;
- the reduction of the impact of traffic on the Forest;

and

- the encouragement and support for sustainable transport options such as the Epping Forest shuttle bus service that was started in 2011 and it is hoped will be continued from 2013.

Air pollution Options

The options under air quality and congestion are not sufficient in our view. We consider that the an option should have been set out which would have led to a Policy compatible with the Council's duties under the Habitat Regs 2010 as follows:

"Any new development that may generate pollution that would adversely impact on Epping Forest SAC or add 0.1kgN/ha/year to the Critical Load of nitrogen deposition on the Forest would be subject to an Appropriate Assessment by the Council as the Competent Authority under the Conservation of Habitats and Species Regulations 2010."

In addition, the consequences of this policy for development proposals should be set out along these lines:

"Any negative impact on Epping Forest Special Area of Conservation (SAC) will need to be minimised in accordance with the protection to its integrity under the Conservation of Habitats and Species Regulations 2010. An Appropriate Assessment may need to be carried out by the Council as the Competent Authority to determine if air pollution would adversely affect the Forest and, if so, what measures would need to be taken to prevent this adverse impact, including the refusal of planning consent."

-----oo00oo-----

Section 8 Infrastructure and CIL

As emphasised already throughout our response, the provision of coherent, robust green infrastructure of high quality for access and wildlife is vital to the protection of the important wider Forest landscape as well as to the Forest itself. The second bullet point on page 187 should be expanded considerably to take on board the need to develop this green infrastructure and to identify linked sites within the Green Arc in particular. Green space and urban green space in particular is hugely important for people's health and well-being and provides many ecosystem services including the removal of pollution. To make the most of CIL requires a green infrastructure strategy that other partners and stakeholders can sign up to.

-----oo00oo-----

Section 9 Responding to Climate Change

Question 93

We do not consider that all relevant issues have been listed. In particular, biodiversity is not emphasised such as the need for a robust network of wildlife sites to allow species to respond to change (e.g. fluctuating butterfly populations). The importance of good green infrastructure development to provide ecosystem services, like flood control, also needs to be promoted and the Council should be identifying these ecosystem services and how they will be provided more clearly as part of its policies.

The impacts of air quality and traffic pollution are somewhat separate from Climate Change and should be covered in Section 7. However, the severe impacts of drought on the Forest vegetation and other key green spaces should be an issue for the Council and needs the options being considered more carefully.

Question 94

For Carbon reduction we would request (as in our comments on Section 7 above) that the Council considers the adoption of the Epping Forest Transport Strategy and looks to have a strategy to reduce vehicle emissions in both urban areas and across the Forest.

An Option that needs to be included is that of Tree Strategies and their continued development and their focussing on ameliorating climate change. There is much evidence, compiled by amongst others The Woodland Trust recently, that demonstrates conclusively the value of urban trees for ameliorating the impacts of air pollution and climate change and providing support for wildlife. We would request that these are added in as options for mitigating climate change including specifically the planting and maintenance of open-grown, native trees to enhance corridors and links around the Forest's boundaries and to provide successors, eventually, to the thousands of ancient and veteran trees in the District, which help to define the character of the place.

Options should also include the consideration of options for biofuel and how the District will respond to any wood-fuel, short rotation coppice area developments as these may have an impact on landscapes including conservation areas.

-----oo00oo-----