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Cllr Richard Bassett
Planning Policy Portfolio Holder
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Dear Cllr Bassett

Ref: Comments on the Green Belt Review Stage One report (June 2015) (GBR)

The City of London Corporation is appointed by the Epping Forest Acts 1878 and 1880 as the Conservators of Epping Forest. Epping Forest is an IUCN Category IV Protected landscape comprising of a major Site of Special Scientific Interest (SSSI) and Special Area of Conservation (SAC). Epping Forest is also both the District's, and London's, largest public open space receiving some 4.2 million visits each year.

The City of London welcomes your Council's formal recognition, under paragraph 1.3 – Environmental Constraints, of both the statutory protection extended to Epping Forest's designated and non-designated sections, and its associated Buffer Lands as an absolute constraint to development given their important role in protecting the internationally-important Forest over the past 60 years.

Chapter 2 History of the Green Belt and Local Green Belt Policy

History of the Green Belt: we are pleased to see that the report provides some important context for the Green Belt given its importance to the District. In addition, as Epping Forest was one of the inspirations for the Green Belt principle, beginning with the First Report of the Greater London Regional Planning Committee 1929 and its 'green girdle' around London, followed by the County of London Plan 1943 which first implemented the notion of a 'Green Belt'. The Green Belt has been a successful national and international planning policy, and, Epping Forest's early influence on the concept is certainly something which should be properly recognised.

Local Green Belt Policy: we wholeheartedly agree with and support the statements made under para 2.9, in particular the quoted EFDC Local Plan paragraph 5.12a. The Conservators also attribute very great importance to the character of the Green Belt and this has been demonstrated both by our consistent support of your Council's Local Plan Green Belt Policies and, even more emphatically, by our acquisition and management of the Epping Forest Buffer Lands.

Chapter 3 – Exceptional Circumstances

The Conservators accept (paras 2.10 & 3.3 of the GBR) that the cyclical review of the Green Belt is necessary within the District, provided that the focus of the review is the purposes of the Green Belt as opposed to purely housing pressure.

Chapter 4 – Current Status of the Green Belt within the District

Appraisal of GB parcels: whilst the Conservators accept that at this Stage One of the Review it is rational and defensible for the appraisal of the GB parcels to be against the first four published National Policy Planning Framework (NPPF) criteria (the purposes of GB), we do not accept or expect Stage Two assessments to be conducted without a more comprehensive assessment of the character and quality of the GB parcels and their important local purposes, particularly fulfilling your Local Plan GB policies. In particular, given the Forest's immense importance to the District as an open space and ecological biome, we would expect a comprehensive assessment and scoring of each parcel's function in protecting and buffering the Forest from future inappropriate and adverse development.

Alongside this proviso, we have concerns over the methodology of Stage One and the way in which the criteria have been applied or interpreted for particular parcels. A general concern is the reliance on the 'Defensible boundaries' (Appendix 2). It is not at all certain that some of these boundaries would prevent 'sprawl' for example. The development of Enfield Island (LB Enfield) and the Meridian Way development to its east within EFDC (both with footbridge links to neighbouring developments) suggest 'sprawl' can take place even with physical obstacles including industrially-contaminated land. Loughton and the Central Line is another case in point within the District. Furthermore, motorways do not necessarily prevent sprawl given some oft-mooted plans for ribbon developments along motorway corridors like the M11. The developments around Junction 25 of the M25 are an example nearby.

Reservations and concerns for specific parcels will be set out in some of our comments below.

Chapter 5 District-Wide Analysis of Appraisal Results

Purpose 1 - To check the unrestricted sprawl of large built-up areas

We query why Loughton is not included along with Cheshunt and Hoddesdon and Chingford (part of London) as a large-built up area given its population size and its direct links through Buckhurst Hill to Woodford and the London Borough of Redbridge. In respect of this we would propose much of the Forest parcel DSR-054 as **strong** in preventing Loughton's 'sprawl'. This is especially relevant given that the neighbouring GB parcel of Forest DSR-057 is scored **relatively strong** because it prevents Chingford's (i.e. London's) northward 'sprawl'. Loughton is the largest urban location in the District by population and is as continuous with London as Chingford is given the housing all the way along the Central line. DSR-054 is the only reason that it (and London) has not sprawled out further still. DSR-042 would similarly be considered **strong** just as it is for Purpose 2.

Purpose 2 – To prevent neighbouring towns merging into one another

We would repeat our reservations about the motorways and the Central Line being strong defensible boundaries (see the GBR para 5.17). Without GB parcel protection this would not seem to be the case given our evidence above, in particular the continuous development to the east of the Central Line between Loughton and Woodford (London). Therefore, whilst we support the designations of DSR-054 and DSR-042 in Figure 9 of the GBR we would request that DSR-043 and DSR-044 are reconsidered as *strong*. DSR-043 contains Buffer Lands at Great Gregories and DSR-044 south of Epping is most important with the Forest Land at Sheppard's Meadows.

Purpose 3 – To assist in safeguarding the countryside from encroachment

In general we very much welcome the clear recognition of the success of the Green Belt parcels in supporting this vital purpose. One major beneficiary has been Epping Forest which, of course, is very special, irreplaceable ancient countryside that also defines the District. As stated above, although we accept the use of the four-purpose criteria in Stage One we consider that it would be unsustainable to continue with Stage Two or any further assessments of the GB parcels without criteria that prioritise the importance, vulnerability and quality of the landscape being protected by the parcels.

We do not support the apparent conclusion from para 5.25 of the GBR that 'visually significant slopes' are sufficient protection of the countryside that allow the Green Belt purpose to be less important in these areas. For example, in the case of DSR-054 this argument cannot hold as the slope in question is the Epping Forest ridge: – the Forest's public open space from which any such developments can be viewed and which would clearly have injurious impacts on the "natural aspect" of the Forest which is to be protected by the Conservators under the Epping Forest Act 1878 and for which we seek support from EFDC through the Local Plan. Therefore, in relation to these points we do not accept the downgrading of the whole of DSR-054 (Forest Land) just because of the topographical argument.

We also have concerns that previous poor consent decisions made contrary to Green Belt Policy is being used to support the downgrading of scores. While we would accept that the 9.61ha development, to which we have previously objected, has had an impact on this area of Forest, but such an "error" in the planning process could be argued as making the remainder more precious rather than less valuable. Inconsistent consents should not be compounded by reducing the protection criterion of the whole of a Green Belt parcel of this size. We would however accept that on a relative Green Belt/development ratio, the Great Woodcote Park estate and the adjoining ribbon development on the Loughton Way/Valley Hill/Oakwood Hill axis has compromised the overall buffering impact of the North Farm site within DS-054.

In a similar vein we object to the downgrading of DSR-059 to only moderate because of the incursions at either end of the parcel (Meridian Way) and Gilwell Hill which again were subject to strenuous objection. The remaining countryside area of is enormous importance to the quality of the Forest's surrounding landscape and contains important wildlife habitats. DSR-059 still retains a purpose, although we would accept that this may be as a parcel of a different size and shape. Any further assessment should not, therefore, be made in relation to considering development here, which could result in harmful ribbon development and unsustainable traffic generation, but rather in considering how the parcel boundaries should be re-drawn and re-configured (as in para 6.1 (i) of the GBR).

Aggregated Scores

Given our comments above we do not support the aggregated scoring for parcels DSR-042, DSR-043, DSR-044, DSR-054, DSR-058 and DSR-059.

We are also most concerned that the aggregate score for DSR-068 north of Waltham Abbey should score so low when this is of key importance to the countryside of the Cobbins Brook and the ancient Green Lanes to its north within the Forest. This latter parcel's low scoring seems only to be on the basis that Waltham Abbey is not considered part of a large built-up area even though more or less contiguous with Waltham Cross and Enfield (and the new development at Meridian Way).

Chapter 6 – Broad Locations for further assessment

We reiterate our welcome for the inclusion (para 6.3 of the GBR) of non-designated Epping Forest land and the Epping Forest Buffer Lands as absolute constraints alongside the statutory designations of Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI). In terms of the protection of the SAC it is worth at this point emphasising your Council's role as the 'competent authority' in regards to the Habitats Regulations 2010 and the assessment of the likely impact of developments (alone and in combination) on Epping Forest SAC.

Settlements

We welcome the fact that although Sewardstone scored 7 in the Settlement Hierarchy Technical Paper (SHTP) assessment it was downgraded to a 'hamlet' on the basis of its lack of a centre and poor services. The ribbon development along Sewardstone Road is of considerable concern, hence our comments above about the need, in our view, to consolidate the GB parcel boundaries of DSR-059.

Settlements for further Green Belt Review

Given the above therefore, we can only object to the inclusion of the hamlets of High Beach and Sewardstone in the Stage Two Further Assessments. As a hamlet Sewardstone does not seem to merit further assessment and the steps taken to add it to the list of 22 settlements in Figure 17 are not clear given its downgrading. This hamlet should remain with the GB boundaries "washed over it" as with other hamlets in the District. At the very least the GB boundaries should only be altered to recognise the existing development but not to allow any further unsustainable growth.

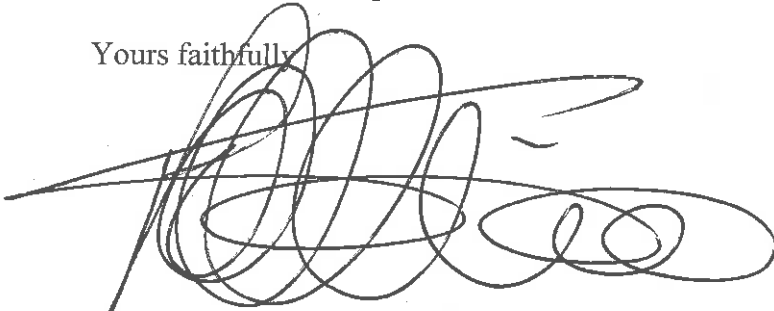
Of even greater concern is the inclusion of the hamlet of High Beach (score of 4 in the SHTP) for further assessment. The reason given in paragraph 6.2 is that there are "concerns around the potential erosion" of GB policy. We do not consider that this area is suitable for development given its juxtaposition to Epping Forest SAC/SSSI and, therefore, cannot be considered for potential release for development under para 6.1 (iii). However, given that it is a hamlet of limited extent we can also see no purpose to GB boundary amendments which might weaken the protection of the countryside and Epping Forest (para 6.1 (i)). We, therefore do not see a purpose in a continued confirmation of this land as GB under para 6.1 (ii) reasoning. It would seem to us absolutely clear that the land should remain in the Green Belt and no further "erosion" should be allowed.

Chapter 7 Conclusions and Stage Two Further Assessments

Finally, we would like to express our concern with regards to the overall impact of the mapping of areas for further assessment for Stage Two. Given that this Green Belt review has been driven to a large extent by concerns over the capacity of the District to accommodate housing the identification of these areas may well act to create "hope value" on land within these areas of Green Belt and inadvertently undermine the strength of the GB here. It may well lead to housing applications on inappropriate areas but which may well be taken to appeal, if refused, given the uncertainty over the land.

The areas for further assessment now surround the Forest despite its importance for landscape character, wildlife and as an open space protected for its "natural aspect". At the moment the process of Green Belt analysis seems to be temporarily undermining what has been over 50 years of successful and vital protection for the Forest. Therefore, we would urge your Council to expedite the Stage Two process both to remove the uncertainty and also to ensure strengthened protection for this irreplaceable natural asset.

Yours faithfully

A large, complex handwritten signature in black ink, consisting of multiple overlapping loops and a long horizontal stroke extending to the left.

Paul Thomson BSc MA MCIMSPA
Superintendent of Epping Forest