



11<sup>th</sup> June 2025

Dear Members of Policy & Resources Committee

I hope you are well, and that many of you have had some time over the recent weeks to visit the wonderful Epping Forest, one of the Green Lungs of London that your predecessors at the City of London Corporation stepped in to protect almost 150 years ago as Conservators of the Forest under the 1878 Epping Forest Act.

And since then, with great foresight, you, and your predecessors, bought or acquired Buffer Lands to help physically protect the Forest from adjacent development. That physical protection is more important now than ever before, with over 68,000 new homes already planned within a 6.2 kilometre Zone of Recreational Interest over the next 15 years.

Epping Forest Heritage Trust is a charity and membership organisation, with over 1,000 members around the Forest, and thousands more supporters, and I am writing on their behalf, as requested by my Trustees, to express our concerns about the proposals set out in Agenda Item 9 about the proposed Complementary Land Policy and Complementary Land Proposal.

We have previously expressed [our concerns to the Epping Forest & Commons Committee](#), and are pleased that some of the issues that were raised have been addressed in the papers, including the representation of Epping Forest through the Superintendent, consultation with Members and Consultative Groups. However the papers are still clear that the new Complementary Land Policy and Complementary Land appraisal could lead to existing Buffer Lands being sold or developed - *I set out the **key relevant paragraphs** below for your ease of reference, with a short commentary in bold italics.*

**Our position, which we hope you will consider at your meeting tomorrow, is as follows:**

- We think the Buffer Lands should retain their current name. They were bought or acquired to protect the Forest, a job they have done well, and continue to do well. Their name reflects their purpose.
- The City of London Corporation should retain the Buffer Lands as a green buffer to physically protect the Forest. Indeed, at this time of even greater threats to the Forest from climate change, pollution and adjacent development, and as the sole Trustee of the Epping Forest Charity, we think the City should be looking to expand the Buffer Lands to afford even greater protection to the Forest, not looking to reduce the protection it already has.



- We are concerned about the clear conflicts of interest that exist between the City of London Corporation, who might want to sell or develop the Buffer Lands for profit, and the City of London Corporation as Conservator of Epping Forest under the 1878 Act, and the City of London Corporation as the sole Trustee of the Epping Forest Charity.
- We, and the Epping Forest Consultative Group, should be consulted formally about the Complementary Land Policy and Complementary Land Appraisal whilst they are still in draft form, before they go to the Epping Forest & Commons Committee for discussion, and before they come back to your Committee for decision.

#### **Key relevant paragraphs:**

##### **Cover paper**

2. It is proposed that land assets which are managed, used and/or occupied by the Natural Environment Charities, but which are held by the CoLC in a **non-charity trustee capacity**, will be referred to henceforth as Complementary Land, replacing previously used terms such as 'Buffer Land' and 'Pink Land' (ensuring reference to previously used terms including their importance and history in supporting documentation).

***[Note. We are not convinced that the City holds any of the Buffer Lands in a non-Trustee capacity. The City is the sole Trustee of the Epping Forest Charity, and as such has a duty to protect the Forest. We believe these lands, as is suggested in their name, were bought or acquired to protect the Forest, and therefore were clearly bought or acquired by the City to help it fulfil its charitable objects to protect the Forest. The Buffer Lands have been managed through the Epping Forest & Commons Committee for many years as an integral part of the Committee's, and the City's, management of the Forest, as the sole Trustee of the Epping Forest Charity. We think they are therefore, in fact, lands that the City holds as Trustee of the Epping Forest Charity]***

***The City of London Corporation is also the Conservator of the Forest in the 1878 Act, and therefore, in that capacity, has an overarching statutory duty to protect the Forest. We believe that the Buffer Lands were bought or acquired by the City to help it fulfil these duties, and we find it hard to imagine how selling any of the Buffer Lands could be seen to be in the best interests of it fulfilling its duties as Conservator to protect the Forest.]***

7. The Complementary Land Policy will be taken to the NE management committees for decision and then to P&R for final approval. **The NE management committees, consultative committees and groups will be engaged in the development of the Policy.**

##### **Complementary land policy TOR**

Complementary Land assets are not charity assets, instead being owned by the CoLC and held in City's Estate or City Fund, **however they were purchased to support the objects, operations and resourcing of the NE Charities.**



***[Note: presumably this recognises that, in the case of Epping Forest, the Buffer Lands were bought or acquired in fulfilment of the City of London Corporation's duties as Conservator of the Forest under the Act.]***

5. Prior to this, Natural Environment Committees and Consultative Committees and Groups will be engaged on the content of the Policy as the use and management of Complementary Land assets will have implications for the management of charity sites and operations. Feedback from these engagements will be shared with P&R along with the proposed policy.

***[Note. See above. We request that this be a formal consultation with us and the Epping Forest Consultative Group on a draft policy and draft land appraisal, before the papers go to the Epping Forest & Commons Committee for discussion, and before they come back to Policy & Resources Committee for decision.]***

### **Complementary Land appraisal TOR**

Complementary Land parcels and the built assets on them may provide opportunities for income, environmental buffering and improvements, commercial ventures, recreation, operational uses and other projects. They may also present opportunities for housing or other development. In order to fully inform decisions over these assets a full impartial assessment by an external consultant is proposed, which will consider all relevant criteria and associated risks, constraints and obligations.

#### **3. Purpose**

To assess the potential viability of each site alternative use, e.g. housing, commercial development or other development, and/or for natural conservation (i.e. biodiversity net gain) of whole or part of those land parcels, in view of the corporation and Charities' priorities; subject to planning permission and taking into consideration such matters as changing National Green Belt policy, Local Plan and new housing targets for local authorities


4. This work, in particular the potential for housing or commercial use of these land parcels, has been requested by Policy & Resources Committee

5. The appraisal with recommendations for each of the land parcels at each location will be brought to the relevant Natural Environment Management Committees for consideration, to the Resource Allocation Sub-Committee for consultation, and then to Policy & Resources Committee for final approval (as these assets are currently held by the CoLC in City's Estate or City Fund).

***[Note: it is clear that there is a strong driver in these Terms of Reference for the sale and development of the Buffer Lands. We believe the Buffer Lands should be retained to protect the Forest, helping to maintain and enhance its natural aspect and biodiversity.]***

***We believe that we, and the Epping Forest Consultative Group, should also be consulted on the Complementary Land Appraisal, in advance of it going the Epping Forest & Commons Committee and Policy and Resources Committee.]***





Finally, I do hope this briefing has been helpful. If you have any questions please do email or give me a call.

Very best wishes



Peter Lewis

Chief Executive



**Epping Forest  
Heritage Trust**

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