



Epping Forest & Commons Committee

Date: MONDAY, 14 JANUARY 2019
Time: 11.30 am
Venue: COMMITTEE ROOM - 2ND FLOOR WEST WING, GUILDHALL

Members: Deputy Philip Woodhouse (Chairman)
Graeme Smith (Deputy Chairman)
Peter Bennett
Alderman Sir Roger Gifford
Caroline Haines
Alderman Gregory Jones QC
Gregory Lawrence
Sylvia Moys
Benjamin Murphy
Jeremy Simons
Oliver Sells QC (Ex-Officio Member)

For consideration of Business Relating to Epping Forest Only

Verderer Michael Chapman DL
Verderer Melissa Murphy
Verderer Dr. Joanna Thomas
Verderer Nicholas Munday

Enquiries: Richard Holt
Richard.Holt@cityoflondon.gov.uk

Lunch will be served in the Guildhall Club at 1pm

John Barradell
Town Clerk and Chief Executive

AGENDA

Agenda

Part 1 - Public Agenda

1. **APOLOGIES**

2. **MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**

3. **MINUTES**

To agree the minutes of the previous meeting.

For Decision
(Pages 1 - 16)

4. **BREXIT UPDATE**

The Director of Open Spaces to be heard.

For Information

Burnham Beeches & The Commons

5. **SUPERINTENDENT'S UPDATE**

Report of the Superintendent of The Commons.

For Information
(Pages 17 - 22)

6. **PROPOSED NNR STATUS FOR THE COULSDON COMMONS AND HAPPY VALLEY**

Report of the Superintendent of The Commons.

For Decision
(Pages 23 - 34)

7. **SPORTS AND MISCELLANEOUS CHARGES**

Report of the Superintendent of The Commons.

For Decision
(Pages 35 - 38)

8. TREE PESTS AND DISEASES: OAK PROCESSIONARY MOTH URGENT UPDATE

Report of the Director of Open Spaces.

For Information
(Pages 39 - 44)

Epping Forest

9. SUPERINTENDENT'S UPDATE

Report of the Superintendent of Epping Forest.

For Information
(Pages 45 - 58)

10. EPPING FOREST DISTRICT COUNCIL LOCAL PLAN EXAMINATION

Report of the Director of Open Spaces.

For Decision
(Pages 59 - 96)

11. EPPING FOREST LAND RETENTION POLICY

Report of the Director of Open Spaces.

For Decision
(Pages 97 - 104)

12. FLOOD ALLEVIATION SCHEME AT HILLYFIELDS LOUGHTON

Report of the Director of Open Spaces.

For Decision
(Pages 105 - 132)

13. EPPING FOREST FIRES 2018 UPDATE

Report of the Director of Open Spaces.

For Information
(Pages 133 - 156)

14. QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE

15. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT

Part 2 - Non-Public Agenda

16. EXCLUSION OF THE PUBLIC

MOTION: That under Section 100A(4) of the Local Government Act 1972, the public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in Part I of Schedule 12A of the Local Government Act.

For Decision

17. NON-PUBLIC MINUTES

To agree the minutes of the previous meeting.

For Decision
(Pages 157 - 162)

18. THE BEECHES CAFÉ - BURNHAM BEECHES

Report of the City Surveyor.

For Decision
(Pages 163 - 166)

19. DISPOSAL OF LAUNDRY COTTAGE, WOODREDON ESTATE

Report of the City Surveyor.

For Information
(Pages 167 - 182)

20. DISPOSAL OF THE LODGE, WOODREDON ESTATE

Report of the City Surveyor.

For Information
(Pages 183 - 198)

21. NON PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE

22. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE COMMITTEE AGREE SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED

Agenda Item 3

EPPING FOREST & COMMONS COMMITTEE **Monday, 19 November 2018**

Minutes of the meeting of the Epping Forest & Commons Committee held at
Committee Room - 2nd Floor West Wing, Guildhall on Monday, 19 November 2018
at 11.00 am

Present

Members:

Deputy Philip Woodhouse (Chairman)
Graeme Smith (Deputy Chairman)
Peter Bennett
Alderman Sir Roger Gifford
Caroline Haines
Gregory Lawrence
Sylvia Moys
Benjamin Murphy
Verderer Michael Chapman DL
Verderer Melissa Murphy
Verderer Dr. Joanna Thomas
Jeremy Simons

Officers:

Gemma Stokley	- Town Clerk's Department
Laura Simpson	- Town Clerk's Department
Alison Elam	- Chamberlain's Department
Colin Buttery	- Director of Open Spaces & Heritage
Paul Thomson	- Superintendent, Epping Forest
Andy Barnard	- Superintendent, The Commons
Jacqueline Eggleston	- Head of Visitor Services (Epping Forest)
Jeremy Dagley	- Conservation Manager, Open Spaces
Jo Hurst	- Business Manager, Epping Forest
Gerry Kiefer	- Open Spaces Business Manager
Helen Read	- Conservation Officer, The Commons
Hadyn Robson	- Support Services Manager, The Commons
Geoff Sinclair	- Head of Operations, Epping Forest

1. APOLOGIES

Apologies for absence were received from Alderman Gregory Jones QC.

2. MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA

There were no declarations.

3. **MINUTES**

The Committee considered the public minutes of their last meeting on 10 September 2018.

The Deputy Chairman and Verderer Murphy both stated that they had been present for the last meeting and therefore asked that they were amended to record their attendance.

A Verderer stated that the minutes incorrectly referred to only one fire incident within the Superintendent's update when there had, in fact been many. She added that controlling these incidents had been very hard work and had involved a lot of time and effort from all. The Director stated that the emphasis was now on the restoration of the Wanstead Flats fire site. A report detailing all 37 fires would be brought to the January Committee meeting.

MATTERS ARISING

Application for Major Event on Wanstead Flats – The Director of Open Spaces clarified that the Committee would receive a formal, detailed proposal on this in early 2019 which would allow sufficient time to gather full information on the issues. A Verderer reported that all three Verderers had received a lot of unfavourable comment on this to date with concerns around crime, traffic, litter and access already raised. Another Verderer urged that adequate consultation is undertaken on any proposals.

In response to a question, the Chairman confirmed that the proposal was concerning an event in 2020. He went on to state that he was very clear in terms of the strength of feeling on this matter.

RESOLVED – That, subject to the amendments requested above, the public minutes and summary of the last meeting on 10 September 2018 be approved as a correct record.

8. **APPOINTMENT OF VERDERER OF EPPING FOREST (SOUTH)**

At the Chairman's request, Item 8 was considered directly after the public minutes of the last meeting (Item 3).

The Committee considered a report of the Town Clerk relative to the appointment of a Verderer of Epping Forest (South).

The Town Clerk explained that, at the request of the Chairman and the Superintendent of Epping Forest, the selected candidate had been invited to attend today's meeting should his appointment be formalised. He had also signed a non-disclosure agreement in order to enable him to access the non-public papers for today's meeting.

The Town Clerk went on to explain that, following legal advice on this matter, and confirmation of the Committee's ability to make these appointments autonomously, the subsequent Court report would suggest that, in future, Verderer appointments would be put before the Court of Common Council for

information only as opposed to for ratification which had previously always been the case.

A Verderer commented that the Epping Forest Act was explicitly clear on the fact that this Committee could make these kinds of decisions independently of the Court of Common Council. He requested that this relationship therefore be clarified as soon as possible. The Verderer went on to refer to the appointment process itself stating that he had been very disappointed with the management of this and the ability of Committee staff to ensure that he received all of the necessary information in a timely fashion.

The Chairman agreed that the receipt of timely information was essential. He stated that he believed that delays on this occasion had been due to the introduction of rules around GDPR and the inability to send documents to external email addresses. He hoped that this matter had now been resolved.

RESOLVED – That, Members endorse the selection of Nicholas Munday as Epping Forest Verderer (South) for onward approval by the Court of Common Council.

Verderer Munday was invited to join the meeting at this point.

4. **EPPING FOREST CONSULTATIVE COMMITTEE MINUTES**

The Committee received the public minutes of the last Epping Forest Consultative Committee meeting on 10 October 2018.

A Member questioned why the Commercial Wayleaves Review had been seen by the Consultative Committee ahead of the Grand Committee today. He questioned whether this was the correct approach, particularly for financial or property/asset matters. The Superintendent stated that this was intentional as it allowed for genuine public consultation on these kinds of issues and the opportunity for this Committee to be informed as to the view of local Forest users. Members were generally supportive of this continued approach. A Member added that it was also important to have a mechanism to feedback to the Consultative Committee on these matters and to offer them the opportunity to then make additional representations where necessary.

A Verderer referred to the minute concerning the London Borough of Culture May Day event on Chingford Plain and the subsequent decision taken on this under urgency. He suggested that it would have been useful to refer back to the Consultative Committee, taking in to account their views, on this matter ahead of approving the proposal. The Chairman indicated that he had considered the Consultative Committees support for the event in making his urgency decision.

With regard to the Woodredon Estate properties, the Chairman reported that he requested that the City Surveyor provide him with details of the covenants and that they also be sent to the Director of Open Spaces, the Superintendent and the Deputy Chairman. He added that he would be happy to circulate these more widely should any Member wish to have sight of them.

RECEIVED.

5. DEPARTMENTAL BUSINESS PLAN 2018/19 - SIX MONTH PERFORMANCE UPDATE

The Committee received a report of the Director of Open Spaces updating Members on progress and performance against the 2018/19 Business Plan by the services which report to the various Open Spaces Committees.

A Member questioned the Amber progress associated with the development of engineering studies for six raised reservoirs at Epping Forest which had been attributed to issues with DBE resources. She went on to refer to the statement elsewhere on the agenda that improvement works on the dams following the engineering assessment would be a statutory requirement for the City of London to complete and questioned whether this should, therefore, be flagged as a red risk and something which the Local Authority could take over on should it not be completed satisfactorily.

Officers confirmed that the traffic light system within the report related to progress against the business plan as opposed to risk.

RESOLVED – That, Members note the progress against the 2018/19 Business Plan objectives, projects and performance indicators.

6. SUPERINTENDENT'S UPDATE FOR AUGUST TO SEPTEMBER 2018

The Committee received a report of the Superintendent of Epping Forest summarising the Epping Forest Division's activities across August to September 2018.

Budgets

The Superintendent reported that two years of DEFRA grant aid were still awaited.

Weather

The Superintendent reported that there had been some difficulties with the rain gauge at High Beech and, as such, recordings for 1st-3rd September were unavailable.

A Verderer questioned the constant problems around water levels on Wanstead Flats and whether water would therefore continue to be pumped here. The Superintendent reported that without this action the lakes would dry up. He added that the Environment Agency had licensed abstraction until 2022 and that harm would be caused to the wildlife and to the Forest's reputation should this pumping cease. There were, however, plans for a more sustainable system to address the matter going forward.

Forest Services

Fly-Tipping

Members were informed that incidents had fallen to 49 over this period compared to 109 over the same period last year. Roadside fly-tipping accounted for 73% of all incidents which was possibly a reflection of the

success of gating the carparks. Builders waste continued to make up the most waste deposited in this way.

Rough sleepers

The Superintendent reported that 5 camps had been found in various areas in this period.

Licences

A total of 53 Licences had been issued in the period reported which had generated an income of approximately £47,000. The Superintendent reported that an extension of Bury Road Compound had been approved.

Unauthorised Occupations

Members were informed that two of the three traveller incursions during the reported period had been cleared within 3 hours.

Deer Vehicle Collision

The Superintendent reported on 9 deer vehicle collisions. He added that incidents continued to occur in a number of key hotspots. He reported that a local group had recently held a roadside campaign to increase driver awareness in the affected areas and that the City Corporation had facilitated the use of Essex Safety partnership illuminated signs visible at key times for deer collisions.

A Member questioned whether Officers were working alongside Highways on this issue and had held discussions around making certain hotspots such as Thornwood Road 40mph as opposed to 50mph zones given the ongoing safety concerns for both drivers and animals. The Superintendent reported that Officers would be campaigning hard for further speed restrictions in hotspot Epping areas as part of the new Forest Transport Strategy.

Heritage; Landscape and Nature Conservation

Biodiversity

The Superintendent reported on treatment of Japanese Knotweed, the discovery of a small family (including juveniles) of Leisler's bat on Warlies Park and a breeding colony of Ivy Bee on Warren Hill.

He went on to inform Members that the Office for National Statistics had published an online interactive map, allowing users to find out how much pollution is removed by vegetation in their area, and how this is valued in avoided health damage costs. The Chairman requested that Members be sent the link to access this website.

Agri-environment Schemes

Members were informed that preparation for the Countryside Stewardship Application for 2019 was continuing and was expected to bring with it come interesting challenges.

Grazing

The Superintendent reported that 29 cattle had been grazing the new Chingford Plain to Bury Wood loop since the beginning of September. The Sunshine South new loop was grazed with 12 cattle.

A Member commented that she had seen a recent piece on television about the introduction of Water Buffalo to help control pennywort weed and questioned whether this might also be considered for the Forest.

Land Management

Town & Country Planning

The Superintendent reported that Epping Forest District Council had submitted their Local Plan on 21 September 2018. In the meantime, the interim Mitigation Strategy had been agreed.

A Member stated that he would be interested in seeing a copy of the letter sent to the Council prior to the submission of its Local Plan to the Planning Inspectorate. The Superintendent undertook to share this with the Member outside of the meeting. He added that he had also requested a cost undertaking from the Council but was yet to receive a response on this.

Visitor Services

Chingford Golf Course

The Superintendent reported that the course had required a significant amount of irrigation this year.

A Verderer questioned the figures for 2018/19 and whether these were the annual figures to date only. The Head of Visitor Services reported that the figures presented were for a rolling annual year. She added that this would be made clear in future reports.

Wanstead Flats Football

Members were informed that good progress had been made around the issue of 'playing without paying'

Visitor Numbers

The Superintendent reported that Visitor Centre numbers were still down on previous years due to the continued closure of The Temple. Members were informed that weight restrictions would now be in place for the upstairs of the building to prevent the floor from flexing.

The Superintendent went on to report that work at the Hunting Lodge had also now been completed thanks to the City Surveyor.

Communication and Information

Members were informed that followers on Twitter, Facebook and Instagram were all on the increase. The Superintendent reported that one recent post concerning blue green algae had reached in excess of 21,000 followers.

A Member commented that, whilst this was encouraging, stakeholder engagement should be considered more widely. He encouraged, for example, the wider distribution of the Forest Focus publication. The Superintendent reported that the Head of Visitor Services was currently looking at undertaking a review of stakeholder engagement. It was recognised that this was an area that would benefit from additional Officer time.

Miscellaneous

The Superintendent advised on the future of St Mary's Church, Wanstead park, which had previously considered by Committee. Following wider debate within the community, local parishioners had agreed to take a more active role in the management of the Church rather than see an external partner take control.

Members were informed that 6 'Tommies' had been placed in various locations as part of the 'There But Not There' installation to commemorate those who had lost their lives in World War 1. There had also been a World War 1 exhibit at The View telling the story of Forest Keepers who went to War.

The Superintendent was pleased to report that Epping Forest greenery was provided as decoration at Guildhall for the High Commissioners Banquet.

7. REPORT OF ACTION TAKEN BETWEEN MEETINGS

The Committee received a report of the Town Clerk advising Members of action taken by the Town Clerk since the last meeting of the Committee, in consultation with the Chairman and Deputy Chairman, in accordance with Standing Order Nos. 41(a) and (b).

A Verderer again asked that the discussion at the Consultative Committee meeting around this event be taken into account as preparations were made.

RESOLVED – That, Members note the report.

9. REVENUE & CAPITAL BUDGETS - EPPING FOREST 2018/19 & 2019/20

The Committee considered a joint report of the Chamberlain and the Director of Open Spaces updating them on their latest approved revenue budget for 2018/19 and seeking assurances for their provisional revenue budget for 2019/20, for subsequent submission to the Finance Committee.

The Chairman highlighted that it was important not to lose sight of the cyclical works detailed within the report.

RESOLVED – That, the Committee:

- Approve the provisional 2019/20 revenue budget for submission to the Finance Committee;
- Authorise the Chamberlain, in consultation with the Director of Open Spaces, to revise these budgets to allow for any further implications arising from Corporate Projects, departmental reorganisations and other

reviews, and changes to the Additional Works Programme. Any changes over £50,000 would be reported to Committee;

- Delegate to the Chamberlain any minor budget changes for 2018/19 and 2019/20 as a result of the completion of the asset verification exercise; and
- Approve the draft Capital and Supplementary Revenue budget.

10. **EPPING FOREST TRUSTEE'S ANNUAL REPORT AND FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 MARCH 2018**

The Committee received a report of the Chamberlain presenting the Trustee's Annual Report and Financial Statements for the year ended 31 March 2018 for Epping Forest in the format required by the Charity Commission.

In response to a question, the Superintendent reported that the Act states that the Corporation, acting by the Mayor, Alderman, and Commons of the said city in Common Council were assembled as the Conservators of Epping Forest. He understood that the Committee were the Trustees representatives for the purposes of the Charity and would confirm this matter with the City Solicitor and Comptroller.

The Chairman reported that he was delighted to see the work of the volunteers reflected within the report.

RESOLVED – That, Members note the report.

11. **EPPING FOREST LICENCE, PRODUCE AND SPORTS CHARGES**

The Committee considered a report of the Director of Open Spaces updating Members on the performance of charges levied for licenced activities, produce sales and formal sports in the last full financial year 2017/18.

In response to questions, the Chairman stated that he had sought clarity around the numbers forecast for both CPI and RPI within the report and had been informed that charges had been increased in line with CPI/RPI at the relevant time. The Head of Visitor Services confirmed that these figures had been taken from the Government Website in 2017 but would reassure members on this matter.

RESOLVED – That, Members:

- Approve the proposed charges for 2019/20 as itemised in Appendix A; and
- Approve continued subsidy for association football.

12. **EPPING FOREST CONSULTATIVE COMMITTEE TERMS OF REFERENCE AND SCHEDULE**

The Committee considered a report of the Director of Open Spaces relative to the terms of reference for the newly established Epping Forest Consultative Committee.

The Chairman explained that the Committee was still very much a work in progress and had only held three meetings to date. With regard to the proposal around increasing the number of meetings the group hold each year, the Chairman stated that there was little appetite for this.

A Member stated that communication here was key in terms of how the dissemination of information to/from this group was to be supported going forward.

A Verderer stated that it was disappointing that the report wasn't able to reflect the most recent meeting of the Consultative Committee that had taken place in October.

Members made a number of comments in terms of the content of the report and suggested that it required some editing.

RESOLVED – That, the Committee note the approved, updated Terms of Reference of the Epping Forest Consultative Committee.

13. **WANSTEAD PARK: - BRIEFING NOTE FOR MEMBERS**

The Committee considered a report of the Director of Open Spaces providing an update on the progress of the Parkland Plan.

The Head of Operations, Epping Forest, reported that the proposal was to put together a Project Group to draw this work together. The City Surveyor would then hopefully submit a paper through the correct gateway process in December 2018.

The Chairman asked that the Director give some thought to how best Verderers might be included in this process. A Verderer commented that it would be particularly useful to have a South Verderer involved. The Director stated that Project Boards tended to be at Officer level but that he would give some thought as to appropriate Verderer engagement.

In response to questions, the Head of Operations reported that the plan was still at a very early stage but would be presented to the Committee in its entirety in due course.

A Verderer questioned whether the funding for the plan would therefore already be approved before the Committee had an opportunity to view/comment on it. The Director reported that Officers were simply looking to initiate the project at this stage and that the Gateway process was a means of making Members aware of the likely financial requirements of the project in broad terms. It would then be for the service Committee and the Project Sub Committee to agree the particulars of the plan at various Gateway stages.

The Chairman stated that it would be useful to have further information on the report being prepared for Project Sub ahead of its submission there. A Verderer commented that Wanstead Park was very topical at the moment, particularly in

the Southern Forest, and that it would therefore be helpful to move quickly on this matter.

A Member clarified that the Gateway 2 report would need to come to this Committee for comment/approval under the new Gateway system. He went on to talk of lessons learned in terms of the importance of community engagement and communication from the Hampstead Heath Dam Project.

RESOLVED – That, Members approve the preparation of a combined LRR and Parkland Plan (Gateway 1/2) project proposal for submission to the Project Sub (Policy & Resources) Committee for December 2018.

14. **COMMERCIAL WAYLEAVE REVIEW**

The Committee considered a report of the Superintendent of Epping Forest relative to the Commercial Wayleave Review.

A Member commented that he welcomed the report and agreed with most of the points within it. He stated, however, that whilst rateable value was a good approximation, it was not necessarily the full picture. He went on to state that rateable values were reviewed every 5 years and suggested that this same approach should be used here as opposed to using the Uniform Business Rate (UBR) multiplier.

The Member went on to suggest that, if there was to be a substantial increase, discussions around phasing these increases in could be undertaken. He noted, however, that statutory undertakers sometimes dictated what they would pay and would not negotiate. He also urged some analysis of what other Committees were doing in this area to ensure consistency in so far as possible.

A Verderer questioned whether a one charge fits all approach was correct or if each case should be looked at individually.

The Superintendent thanked Members for their contributions and agreed that it seemed sensible to go by a 5-year re-evaluation of rateable value as opposed to the UBR. He confirmed that residential cases had now been completed with commercial cases now being determined around the proposed hybrid model. Issues around services wayleaves would then be addressed.

The Superintendent went on to report that legal advice would need to be sought on hand gate matters before taking the matter forward.

RESOLVED – That, Members:

- i. Approve the new commercial wayleave fees immediately based on rateable value (5 yearly reviewable), applying further increases by Committee approval using a recognised multiplier formula;
- ii. Tender a valuation contract with external valuers to value and negotiate the remaining wayleave agreements; and
- iii. Instruct the Comptroller and City Solicitor to assist in completing the necessary wayleave agreements.

15. SUPERINTENDENT'S UPDATE

The Committee received a report of the Superintendent of 'The Commons' providing a general update on issues across the nine sites within 'The Commons' division that may be of interest to Members and is supplementary to the monthly email updates.

A Member congratulated the Superintendent and his staff on two recent, successful site visits to Stoke Common and Kenley Common which she stated was particularly impressive around learning activities.

A Verderer commented that work with South Bucks District Council around the Local Plan production was important in terms of ensuring consistency of approach. She offered to help facilitate these discussions in any way that was required. The Superintendent thanked the Verderer for this offer and reported that discussions around the sharing of mitigation issues for the impact of recreation pressure on Burnham Beeches were taking place and that he would contact her to take up her kind offer in the near future.

In response to questions around the Kenley Revival Update and any anticipated additional costs due to the failure of the mortar on the blast pens and rifle range, the Superintendent reported that he now had 6 trial panels in place and that these would help to determine the materials to be used when repairs are finally carried out. He added that the current assumption was that the City as client would not bear the burden of any additional cost.

In response to questions around the controls in place for dog related incidents, the Superintendent stated that there was a strict protocol in place and that the process was to ensure up to three verbal warnings at which point a final letter of warning is issued. If a further offence ensues then either a fixed penalty notice is issued, or the matter is dealt with at Magistrates Court, depending on the severity of the issue.

With regard to questions on the increased costs associated with OPM's the Director reported that there had been a huge increase in costs across the Department with close to £100,000 being spent on the problem this year alone as opposed to just £10,000 last year. The Director reported that a report on this matter would therefore be put to the Open Spaces Committee in December 2018 flagging this as a strategic issue and then on to various, affected service committees in January 2019. The Director went on to report that costs in excess of £250,000 were anticipated in this area in future years. The Forestry Commission were aware that it was not possible to remove every nest and that work would therefore be targeted on those areas where the public were most likely to come in to contact with the pest species.

A Verderer commented that it would be useful for Members to have an illustrated guide on pest species and an indication of the problems around their eradication/control. The Chairman agreed with this suggestion and asked that it also be made available on social media for the public to consult. A Member commented that this kind of guide was already available from the Forestry

Commission and suggested that Members be sent the link for this to avoid any unnecessary duplication.

RESOLVED – That, Members note the content of the report.

16. **REVENUE & CAPITAL BUDGETS - 'THE COMMONS' 2018/19 & 2019/20**

The Committee considered a joint report of the Chamberlain and the Director of Open Spaces updating Members on the latest approved revenue budget for 2018/19 and seeking approval for a provisional revenue budget for 2019/20 for 'The Commons', for subsequent submission to the Finance Committee.

In response to a question regarding adequate funds to cover the additional 8% of assets to be maintained, the Chamberlain confirmed that the City Surveyor had bid for and approved the additional resources required.

RESOLVED – That, the Committee:

- Approve the provisional 2019/20 revenue budget for submission to the Finance Committee;
- Authorise the Chamberlain, in consultation with the Director of Open Spaces, to revise these budgets to allow for any further implications arising from Corporate Projects, departmental reorganisations and other reviews, and changes to the Additional Works Programme. Any changes over £50,000 would be reported to Committee;
- Delegate to the Chamberlain any minor budget changes for 2018/19 and 2019/20 as a result of the completion of the asset verification exercise; and
- Approve the draft capital and supplementary revenue budget.

17. **ASHTEAD COMMON TRUSTEE'S ANNUAL REPORT AND FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 MARCH 2018**

The Committee received a report of the Chamberlain presenting the Trustee's Annual Report and Financial Statements for the year ended 31 March 2018 for Ashtead Common in the format required by the Charity Commission.

RESOLVED – That, Members note the report.

18. **BURNHAM BEECHES AND STOKE COMMON TRUSTEE'S ANNUAL REPORT AND FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 MARCH 2018**

The Committee received a report of the Chamberlain presenting the Trustee's Annual Report and Financial Statements for the year ended 31 March 2018 for Burnham Beeches and Stoke Common in the format required by the Charity Commission.

RESOLVED – That, Members note the report.

19. **WEST WICKHAM COMMON AND SPRING PARK WOOD COULSDON AND OTHER COMMONS TRUSTEE'S ANNUAL REPORT AND FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 MARCH 2018**

The Committee received a report of the Chamberlain presenting the Trustee's Annual Report and Financial Statements for the year ended 31 March 2018 for West Wickham Common and Spring Park Wood, Coulsdon and Other Commons in the format required by the Charity Commission.

RESOLVED – That, Members note the report.

20. **THE COMMONS EVENTS POLICY REPORT**

The Committee considered a report of the Superintendent of The Commons relative to The Commons Events Policy.

The Chairman clarified that the proposed policy was similar to the policies already in place elsewhere.

A Member questioned how consultation on events would take place. The Superintendent stated that he only envisaged consultation in exceptional cases given that the majority of issues/events were low key.

RESOLVED – That, Members:

- Note the approved Open Spaces Departmental Events Policy attached as Appendix 1;
- Approve the policy approach outlined in the report and the site-specific Events Policy for The Commons and schedule of event locations attached Appendix 2.

21. **BURNHAM BEECHES MANAGEMENT PLAN. CONSULTATION PROCESS AND TIMETABLE.**

The Committee considered a report of the Superintendent of The Commons relative to the Burnham Beeches Management Plan, Consultation Process and Timetable.

RESOLVED – That, Members approve the necessary actions outlined in the provisional timetable for the Management Plan and public consultation process (Table 1).

22. **STOKE COMMON MANAGEMENT PLAN, PUBLIC CONSULTATION AND GRANT APPLICATION**

The Committee considered a report of the Superintendent of The Commons relative to the Stoke Common Management Plan, Public Consultation and Grant Application.

The Superintendent wished to place on record his thanks to the management plan development team whose work he applauded. He went on to report that Natural England had made an early comment on the Plan stating that it was fantastic and that they wished that others would adopt the same approach to this work.

The Chairman noted, within the Management Plan, that there had been no small mammal survey of the Common and questioned whether this had ever been carried out previously. The Conservation Officer reported that various other wildlife surveys have been carried out and that they would look to include a small mammal survey going forward.

RESOLVED – That, Members approve the final draft plan so that it can then be submitted to Natural England for ratification.

23. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

There were no questions.

24. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**

Committee Papers

A Member asked if the Committee could learn from the Education Committee where the main papers are provided separately from the Appendix pack which allows for easier reference on a digital device. The Town Clerk agreed to consider this proposal.

Post of Honorary Reeve

The Superintendent of Epping Forest reported that Loughton Town Council had nominated Richard Morris for the post of Honorary Reeve.

The Committee voiced their unanimous support for this appointment.

25. **EXCLUSION OF THE PUBLIC**

RESOLVED: That under Section 100A(4) of the Local Government Act 1972, the public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in Part I of Schedule 12A of the Local Government Act.

Item No.	Exemption Paragraph
26-30	3
31-32	-

26. **NON-PUBLIC MINUTES**

The Committee considered the non-public minutes of the last meeting on Monday 10 September 2018 and approved them as a correct record.

27. **COMMERCIAL WAYLEAVE REVIEW**

The Committee considered and approved a report of the Director of Open Spaces which was a companion report to the Public Item regarding future charging for Commercial Wayleaves.

28. **RENT REVIEW - THEYDON BOIS**

The Committee considered and approved a report of the Director of Open Spaces relative to a Rent Review of Theydon Bois Golf Club.

29. **BUTLERS RETREAT CAFÉ - LEASE RENEWAL**

The Committee considered and approved a report of the Director of Open Spaces relative to the Butlers Retreat Café – Lease Renewal.

30. **BURNHAM BEECHES CAFÉ - LETTING OPTIONS**

The Committee considered and approved a report of the Superintendent of The Commons relative to the Burnham Beeches Café – Letting options.

31. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

There were no questions in the non-public session.

32. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE COMMITTEE AGREE SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**

The Committee dealt with business concerning Loughton Golf Course and Newlands Avenue, Woodford in the non-public session.

The meeting ended at 1.16 pm

Chairman

**Contact Officer: Gemma Stokley
gemma.stokley@cityoflondon.gov.uk**

This page is intentionally left blank

Committee(s):	Date(s):
Epping Forest & Commons	January 2019
Subject: Superintendent's Update	Public
Report of: Superintendent of 'The Commons'	For Information
Summary	
<p>This report provides a general update on issues across the nine sites within 'The Commons' division that may be of interest to members and is supplementary to the monthly email updates.</p>	
Recommendation	
<p>Members are asked to note the contents of this report.</p>	

Burnham Beeches and Stoke Common

1. The quarry site at East Burnham continues to operate with extraction progressing well but infilling rather slower at present. The next cell should be ready for soil stripping next spring/early summer. Gravel quality and quantity is variable across the site and in the direction towards the Beeches the depth of gravel is quite shallow with clay just below. Water levels are generally very low, and pumping of water has not been necessary. Some hydrology monitoring points have shown strange readings, but it is considered by the hydrologist that these are not due to the operation of the quarry. Dust monitoring has shown some elevated levels during the autumn, but these are probably due to organic matter rather than quarry workings.
2. South Bucks District Council (SBDC) have gone out to tender for some work which will update that carried out a few years ago and help to justify for the stance they are taking regarding the Beeches in the Local Plan. Another set of consultants continue to work on the Habitats Regulations assessment in relation to air quality. Officers are providing input into both documents as well as the mitigation strategy for the Beeches.
3. Following approval by this Committee the Stoke Common management plan has been finalised and will shortly be available via the website.
4. The final agreement from Natural England (NE) for the Countryside Stewardship grant is still awaited. Recent communication with our NE adviser indicates that it is

making progress but, although it is due to start on 1st January, final approval may not now be received within the expected deadline.

5. A meeting was held with 'Wood', ecological consultants for Heathrow Airport, to outline the process regarding an application for funding biodiversity net gain around Burnham Beeches. A draft expression of interest has been submitted and initial, favourable comments received. Discussions with neighbouring organisations and potential partners have started and will continue into the New Year. A Project Development Officer is to be appointed in early 2019 to develop the scheme. This post is being funded by the City's Priorities Investment Pot (PIP)
6. A temporary mobile refreshment van is now operating at Burnham Beeches on weekends, bank holidays and at other peak times. The tender process for re-letting the Burnham Beeches café will commence early in the New Year with an expectation that it will begin to operate in April 2019. The opportunity has been taken to undertake the necessary cyclical maintenance works and redecorations including rewiring and new flooring.
7. Heathland restoration at Stoke Common continues with contractors clearing trees from small areas of the Main Common.
8. The Volunteers at both sites have continued with scrub clearance and participated in the Christmas task which included wreath making and a party complete with quiz, bingo and Christmas carols. Both sites have Christmas trees made from birch logs erected by the volunteers.
9. A festive trail has been set up for visitors and Carols at the café' taken place.
10. Livestock continue to graze both sites with two pigs at Burnham Beeches and ponies grazing the north and West Commons at Stoke Common before moving to the local country Park, Black Park in early January. The cows have moved to their winter quarters with a local farmer.
11. A student from Belgium has arrived and started her three-month placement at Burnham Beeches. She will be working with the Conservation Officer and assisting with volunteer tasks. Her main project will be assessing the young pollards cut in recent years which will result in a new 10-year management plan.
12. The Ranger team have carried out annual brush cutting works and are preparing to start cutting the young pollards in January.
13. The Head Ranger of Burnham Beeches continues to work with consultants to develop a project to replace the aging car park charging infrastructure at Burnham

Beeches and to introduce similar at Farthing Downs and Riddlesdown. This project is funded from the PIP and delivery is anticipated during 2019.

PARTNERSHIPS

Kenley Revival update

13. Work is progressing on two fronts to resolve the thaumasite sulphate attack issue affecting the conservation works. A series of test panels have been installed within the new spine wall at the Tribute Fighter Pen to test a variety of mortars, bricks and waterproofing solutions. These will be in place for six months to test their resilience to environmental conditions, following which they will then be independently analysed to assess the most suitable repair option. Alongside this a firm specialising in construction law has been instructed to advise on the contractual liabilities involved to establish which party must bear the cost of rectification. Their conclusions, options and recommendations are anticipated in January 2019
14. A series of events to mark Remembrance season has concluded, with 2,527 people directly engaged over three months. This includes 309 school students who took part in remembrance assemblies and workshops, 213 who attended lectures on WWII related themes and conservation, and 53 people who attended performances based on the memoirs of a Kenley WAAF, Lillias Barr.
15. A 'design a Spitfire' competition has just closed with over 200 entries from school students who created artwork based on drawings of Spitfire outlines. The overall winner will have their design painted by an aviation artist.
16. Design of interpretative signage is nearing its final stages and soon the large wings, small wings and tabletop signs will be ready for production. A planning condition to supply material samples must be discharged, and it is now anticipated that a single example of each sign is produced for this purpose. It is expected that the suite of 23 signs will be installed in the spring.
17. The post of 'Kenley Revival Legacy Officer' has been evaluated and will be advertised in January. This is another (PIP) funded initiative to maintain the project's legacy after HLF funding ends in late 2019.

The West Wickham and Coulsdon Commons

18. Having recently appointed a new Livestock Ranger and Conservation Ranger the final vacancy, i.e. Information Ranger is now being recruited. Interviews will be held at the beginning of January 2019. Works to the lodge associated with this post have recently been completed bringing to a resolution long standing damp issues associated with the property.

19. Scrub vegetation around the quarry at Optical Surfaces, Riddlesdown has been cleared and loose rocks in the quarry face were removed by a contractor whilst the operations were carried out, making the site safe for users.
20. High risk tree safety inspections have been carried across all sites. The resulting work specification has been sent to procurement and a contractor appointed. Medium-risk tree inspections are scheduled for mid-January.
21. A contractor has been appointed to carry out a section of roadside tree management along the A22 at Riddlesdown. This carriageway is a strategic route into central London and this work will reduce our risk in terms of tree safety management for the next 10 years.
22. Under the supervision of an archaeologist from the Museum of London, contractors have started to reinstate the ditch and bank system along Ditches Lane on Farthing Downs. In addition to this, the London Borough of Croydon added this byway to their 20mph scheme to help us reduce the speed of vehicles using the site. The benefits of the scheme include improvements to the safety and welfare visitors and livestock, the protection of the Scheduled Ancient Monument from unauthorised vehicle access and the parking of vehicles on the roadside verges.
23. The final coupe of Sweet Chestnut alongside Woodland Way, Spring Park, has been coppiced marking the end of a 16-year rotation
24. The pregnant cattle have now been moved into the barn at Merlewood Estate Office where they will have time to settle in before the first calf is due in January 2019.
25. Rangers and the Kenley Volunteers were joined by the Ashted Common Rangers and their volunteers to carry out hedge laying on the Common. Together they completed a full 'chain' the traditional measuring unit of hedge laying and totalling 22 yards. The hedge was laid in the 'South of England' style, using Hazel stakes and binders to hold the hedge in place until the re-growth stabilises and the hedge can stand alone. The traditional form of hedgerow management is both beneficial for wildlife and can act as a stockproof fence, reducing the need for timber replacement.
26. Rangers spotted a Hedgehog foraging along the grass verge at Spring Park. This is very exciting news as it's the first official record of a Hedgehog at the site. Hedgehog numbers are declining, and numbers have fallen below 1 million in the UK. In the last 10 years the population has declined by 30%. The Ranger team will start monitoring and surveying for Hedgehogs at Spring Park, formally in 2019.

27. A consultant has recently concluded an appraisal of the potential to raise income from the provision of catering services at Farthing Down, Riddlesdown and Ashtead Common. Their report is expected in late January 2019

Ashtead Common

27. Work has started on the veteran oak trees to reduce crowns and halo release according to each trees' individual plan. In total around 75 trees will be treated over a seven-week period.
28. Scrub management work is well under way on the lower slopes and Woodlands Road areas.
29. South East Rivers Trust have produced a design for a reed bed to filter pollutants entering the Rye Brook from a surface water outlet at Two Bridges. The report has not yet been analysed in detail, but an initial look indicates that the scheme would require £200,000 to £250,000 across all partners to achieve.

Incidents

Burnham Beeches & Stoke Common

30. There were 15 reported incidents during the period
31. There were four incidents related to dogs: One dog not under effective control and three PSPO incidents requiring follow up action. Two Fixed Penalty Notices (FPN) have been issued by Rangers, one each for fouling and walking too many dogs to the open Space. One FPN has been paid and the other is still outstanding.
32. Other incidents included, site misuse (camping/motorbikes/ 1 x fly tipping) and one where a Ranger helped in the search for a missing person thought to be at risk of committing suicide. – the person was ultimately found alive and well away from Burnham Beeches.
33. The City Surveyor team have aided site Rangers in dealing with two potential issues of encroachment by neighbouring properties to Burnham Beeches. In one case the encroachment (a shed) has been removed and the ground made good. The other matter is still ongoing.

Ashtead Common

34. Incidents recorded in this period include a person camping, an aggressive man trying to gain entry to the office and unauthorised metal detecting. These were all reported to the Police.

The West Wickham and Coulsdon Commons

35. Rangers were called to an incident on Kenley Common involving a reported dog attack on a deer. Upon arrival members of the public briefed the team on what had happened and the location of the injured animal. Due to the injuries sustained, the Head Ranger took the decision to dispatch the deer. It is understood that the person responsible may be known to us and has previously been cautioned by the Police for a similar offence. The matter is currently being dealt with by the Police and we are assisting with witness statements and previous incident reports.

Filming, major events and other activities

Burnham Beeches

36. There have been five events at the Beeches over the past two months. Despite the closure of the Burnham Beeches Café whilst the re-tendering process is carried out, the Carols event remained very popular with around 150 people taking part in both the carols and the craft activities offered by the Rangers. The festive trail is currently on-going and will run throughout the Christmas period
37. There were two requests for guided walks, one from a former British Airways stewardesses' group and the other some students from Reading University.

The West Wickham & Coulsdon Commons

38. Coulsdon Common - Chain Gang cleared secondary woodland in Stites Hill adjacent to the old pond.
39. Coulsdon Common – engineers, architects and designers from Network rail all came as part of a corporate volunteering day to assist Rangers with scrub clearance at The Grove.

Andy Barnard. Superintendent of The Commons

andy.barnard@cityoflondon.gov.uk

0207 332 6676 Office

07850 764592 Mobile

Committee(s):	Date(s):
Open Spaces and City Gardens Committee Epping Forest and Commons Committee	For Decision 10 Dec 2018 14 Jan 2018
Subject: Proposed NNR status for the Coulsdon Commons and Happy Valley	Public
Report of: The Superintendent of The Commons	For Decision
Summary	
<p>The Director of Open Spaces and Superintendent have attended meetings with Natural England and the London Borough of Croydon, to discuss the potential for the City's Coulsdon Commons and the London Borough's Happy Valley to be declared a National Nature Reserve.</p> <p>At the most recent meeting officers from all parties agreed to seek Member's opinion and potential to commence the formal 'declaration process'.</p> <p>Recommendation(s)</p> <p>Members are asked to:</p> <ol style="list-style-type: none"> i. Authorise Officers to progress the matter with Natural England and The London Borough of Croydon so that a formal proposal can be developed and reported to this Committee by May 2019. 	

Main Report

Background

1. National Nature Reserves (NNRs) are a Natural England designation that reflects the recreational and conservation value of important sites across England. NNRs are recognised as being 'the crown jewels of England's natural heritage'. There are currently 224 NNRs in England, covering 360 square miles (0.7% of England)
2. Two of the City's Open Spaces already have NNR status, both are within The Commons Division namely, Burnham Beeches NNR (declared 1992) and Ashted Common NNR (declared 1995).
3. Natural England produced a new NNR strategy in 2017 that encourages the consideration of additional NNR's across England that meet their strategic criteria i.e. **(Appendix 1)**

Current Position

4. The Coulsdon Commons, consisting of Kenley Common, Coulsdon Common, Farthing Downs and Riddlesdown are high quality open spaces containing many nationally rare habitats and species. They border the Happy Valley and other land, owned and managed by the London Borough of Croydon, that are of similar high value.
5. To realise its new strategy Natural England is seeking to declare a host of new NNR's across England, a process that has been largely dormant since the mid 1990's. The City's Coulsdon Commons and Happy Valley are high on NE's list of potential NNRs.
6. A map of the potential NNR boundary is shown as **Map 1**. It consists of some 417 hectares of land of which approx. 36% is designated by Natural England as Sites of Special Scientific Interest (SSSI). There is potential to further enlarge the area covered by the NNR at a later date should that be required
7. Your Superintendent and Head Ranger met with Natural England in January 2018. It was agreed to consider the matter further with Officers of the London Borough of Croydon. London Borough of Croydon was consulting at the time on the future of Happy Valley and associated open spaces and the meeting explored if the Borough was sympathetic to the idea of closer working and enhanced designation.
8. A second meeting of officers took place in October 2018 with Natural England, The London Borough of Croydon and the City of London Director of Open Spaces, Superintendent and Head Ranger in attendance.
9. From that meeting it became clear that there was a synergy and willingness between Officers of all three organisations to manage the differing land ownerships under a single NNR title.
10. It was recognised that NNR status across ownership boundaries would present partnership opportunities that could bring benefit to the long-term management of the Coulsdon Commons and Happy Valley whilst providing a significant contribution to the Government's strategic desire to protect England's most precious natural assets.
11. The declaration of land as a NNR not only recognises the high recreation and conservation value of the site but the high standards of management expertise required to maintain that value. The NNR declaration would be a high profile opportunity to the City to celebrate the importance of the Commons to local people and the conservation work being undertaken.
12. Key strengths of NNR status include:
 - a. Increases collaboration between landowners.
 - b. Enhance profile of the owning bodies and managers.
 - c. Recognised as places of excellence where people can engage with nature.

- d. High standards of biodiversity and geodiversity where an abundance of variety of wildlife can be found.
- e. Extensive environmental monitoring and research opportunities.
- f. Enables the City and the London Borough of Croydon to demonstrate their support for the Government's strategic desire to use NNRs to galvanise landscape-scale conservation – the Lawton principle.
- g. Higher profile to attract environmental grants.

Proposals

13. Discussions are at a very early stage so it is proposed that:
- a. Officers continue to engage with Natural England and the London Borough of Croydon to further develop the NNR concept so that formal proposals can be brought to this committee for approval by May 2019.

Corporate & Strategic Implications

14. The recommendations of this report supports the Corporate Plan with particular reference to the following aims:
- a. Contribute to a flourishing society**
 - i. People enjoy good health and wellbeing
 - ii. Communities are cohesive and have the facilities they need
 - b. Shape Outstanding Environments**
 - i. We inspire enterprise, excellence, creativity and collaboration.
 - ii. We have clean air, land and water and a thriving and sustainable natural environment.
 - iii. Our spaces are secure, resilient and well maintained

And supports the Open Spaces Business Plan as follows:

- a. Open Spaces and historic sites are thriving and accessible.**
 - i. Our open spaces, heritage and cultural assets are protected, conserved and enhanced
 - ii. London has clean air and mitigates flood risk and climate change
 - iii. Our spaces are accessible, inclusive and safe
 - iv. Our habitats are flourishing, biodiverse and resilient to change.
- b. Spaces enrich people's lives.**
 - i. People enjoy good health and well being
 - ii. Nature, heritage and place are valued and understood
 - iii. People feel welcome and included
 - iv. People discover, learn and develop
- c. Business practices are responsible and sustainable.**
 - i. Our practices are financially, socially and environmentally sustainable
 - ii. London's natural capital and heritage assets are enhanced through our leadership, influence, investment, collaboration and innovation

Implications

15. Experience at Burnham Beeches and Ashted Common indicates that NNR status need not place an additional funding burden on the City. Indeed the status can very usefully attract additional funding, particularly towards the cost of research and monitoring. It can also raise the land's profile for grants to fund conservation and recreation objectives.
16. The proposal provides opportunities to build closer working partnerships with the London Borough of Croydon and perhaps other local landowners to develop shared management plans, objectives and projects with the prospect of making more efficient use of the resources available.
17. NNR status does not bring greater legal protection (or management obligation) to the land but it does accord high reputational value to NNR landowners and gives greater weight to environmental protection issues as part of the Local Authority's Local Plan.
18. Natural England indicate that the designation process if commenced in May 2019 could be completed by the end of that year.

Conclusion

19. NNR status provides enhanced reputational value on the owners of the land and their management of the natural environment and would demonstrate the City's commitment to the Governments strategic aim to create landscape scale conservation projects.
20. Officers of the City of London, London Borough of Croydon and Natural England, recognise the value of designating the Coulsdon Commons and, Happy Valley as a National Nature Reserve and seek authority to develop proposals for approval by this committee that may lead to formal designation in 2019.

Appendices

Appendix 1. Natural England's NNR Strategy

Map 1. Potential NNR boundary, SSSI status and ownership.

Background papers

None

Andy Barnard

Superintendent. The Commons

T: 07850 764592

E: andy.barnard@cityoflondon.gov.uk



National Nature Reserves

At the heart of conservation in the 21st Century

A Strategy for England's National Nature Reserves in the 21st century: for conservation, environmental research and people



National Nature Reserves

At the heart of 21st century conservation

England's National Nature Reserves are the crown jewels of England's natural heritage. We manage them in the best way possible.

From Lindisfarne in Northumberland to The Lizard in Cornwall, these rare and precious sites secure our country's wonderful wildlife and rich geology for us all.

We want to inspire people, promote learning, and encourage involvement in the wider landscape.





© Natural England/Martin Drevitt

Conservation

National Nature Reserves are our finest sites for wildlife and geology. Placed at the heart of healthy and strong landscapes, we can make sure their abundant wildlife brings over to enrich surrounding areas.

We will invite more landowners to join the National Nature Reserve network, helping to reflect the diversity, range and richness of our natural heritage. With more sites joining the National Nature Reserve network, we will make more space for nature.



© Natural England/Paul Gendell

Environmental research

National Nature Reserves are our natural laboratories. They will be widely used for experimentation and long term monitoring to increase our understanding of our natural environment. They will demonstrate the very best conservation practice and inspire environmental scientists, young and old alike.



© National Trust/Imago/John Bish

People

National Nature Reserves' high quality and accessible habitats offer many ways to enjoy and engage with our natural heritage. Whether improving our wellbeing, taking part in citizen science opportunities or volunteering, we will help more people get actively involved in their local site.



© Natural England/Peppercorn

Partnerships

We will build on existing local partnerships to create stronger links between National Nature Reserves and their surrounding landscapes and communities. We will collaborate on environmental research and together offer more opportunities for people to enjoy their local sites.



© National Trust / Paul Harris

Sandscale Hawes NNR

Support England’s National Nature Reserves

England’s National Nature Reserves embody our natural diversity: our multi-layered geology, ferny woodlands, ancient grasslands and heaths, glimmering wetlands, and wild coasts and moorlands. Here nature comes first, protecting wildlife and inspiring individuals.

The National Nature Reserve Strategy has been created by a partnership of public bodies, wildlife charities and other representatives. We developed a shared vision and a common purpose to take forward the founding purposes of NNRs – conservation, environmental research and places for people – putting them at the heart of 21st century conservation.

Interested? Go and explore, get involved in your local sites and enjoy your natural heritage.

The NNR Partnership comprises
Butterfly Conservation, Escrick Estate, the Forestry Commission, the National Trust, Natural England, Plantlife, RSPB, the Wildlife Trusts and the Woodland Trust.

Front cover images clockwise from top left:

- Below Sheepscombe Common © Natural England/Peter Wakely; Lindsifarne © Natural England/John Dunn;
- Walkers on Shapwick Heath © Natural England/Paul Gleadow; Crinoid fossils © Natural England/Peter Wakely;
- Waxcap © Natural England/Julian Dowse; Pond dipping, Saltfleetby - Theddlethorpe Dunes © Natural England.

England's National Nature Reserves

The map shows the location and types of NNRs in England. The examples illustrate how current initiatives will help achieve the aims of the Strategy on a larger scale across the country.



© Environment Agency



© National Trust/James Ross/Redburn



© Natural England/Alan Drent



© Natural England/Alan Drent

1 Partnership

The **Ribble Estuary National Nature Reserve** is a shining example of partnership working, bringing together RSPB, Natural England and the Environment Agency. Flood defence improvements have been combined with habitat creation, to deliver much needed local climate change adaptation and provide invaluable new wildlife sites close to Britain's most important estuary for birds. On completion, the expanded NNR will be the largest of its kind in northern England.

2 Conservation

The renowned wildlife of the **Purbeck Heaths** is already represented in three well established National Nature Reserves. Now Natural England, RSPB, the National Trust and other land managers are working together to harmonise management across the wider area of the Purbeck heathlands.

3 People

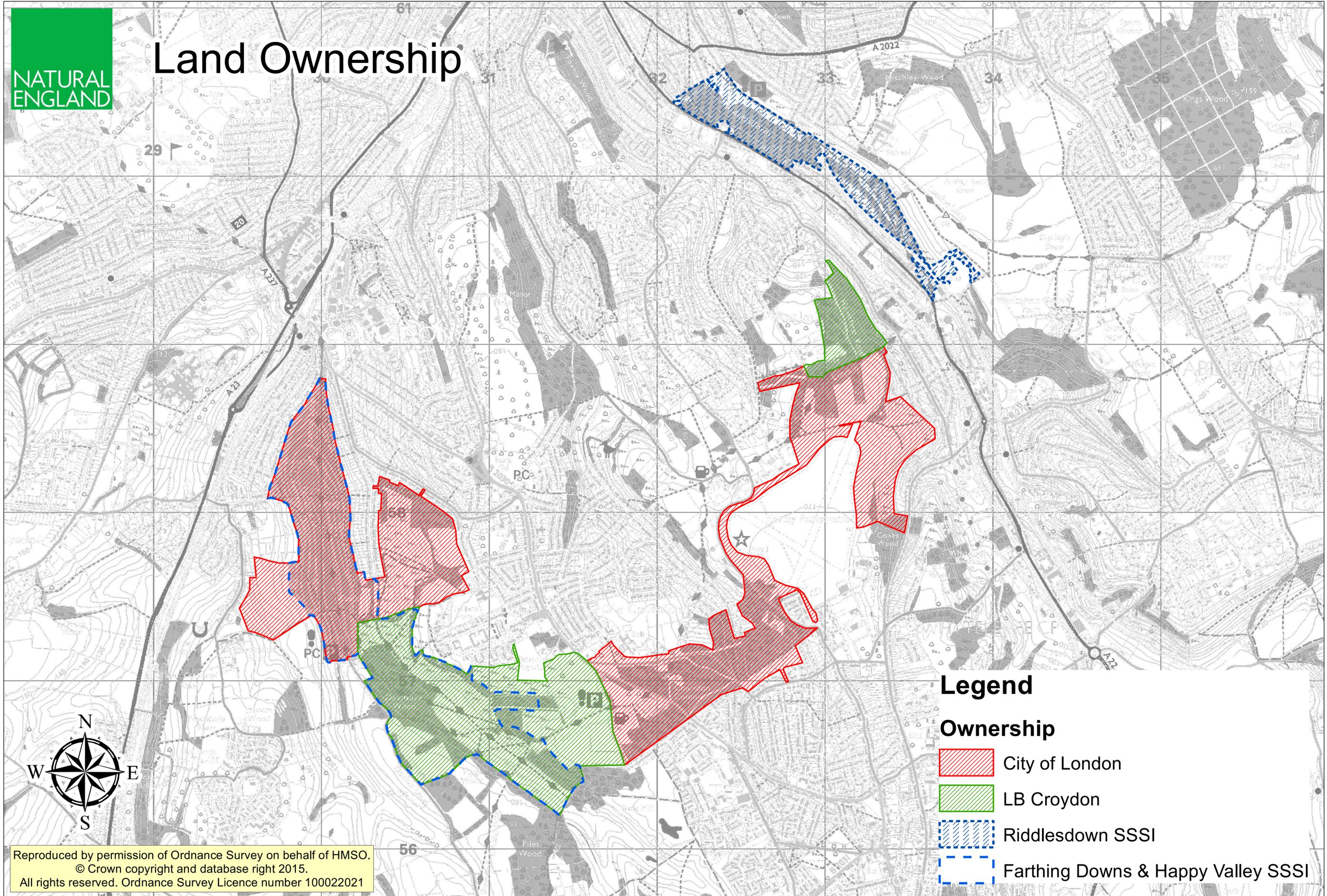
Wren's Nest National Nature Reserve is one of the most notable geological locations in the British Isles, famous for its large numbers of beautifully preserved Silurian limestone fossils. Located in an urban setting, the site's wardens and volunteers excel at providing activities and information for audiences ranging from local visitors to geologists around the world.

4 Environmental Research

Dersingham Bog National Nature Reserve has long been used for a wide range of research both by Natural England and by the wider scientific communities. Subjects include heathland restoration and management, geomorphological studies and species dynamics. In one example, studies of nightjar feeding flights showed how these mysterious birds are using a string of National Nature Reserves across Norfolk as their flyways.

This page is intentionally left blank

Land Ownership



Legend

Ownership

-  City of London
-  LB Croydon
-  Riddlesdown SSSI
-  Farthing Downs & Happy Valley SSSI

This page is intentionally left blank

Committee(s): Epping Forest and Commons	Date(s): 14th January 2019
Subject: The Commons, Sports and Miscellaneous Charges	Public
Report of: Andy Barnard – Superintendent of The Commons	For Decision
Report Author: Hadyn Robson – Business Manager	

Summary

This report reviews the charges for sports facilities and miscellaneous items that are provided by The Commons Division and seeks approval for the proposed charges for the financial year 2019-20.

Recommendations

Members are asked to:

- To note income received during the 2018-19 financial year for the reporting period 1st April 2018 to 28th December 2018.
- Agree the proposed charges for the 2019/20 financial year as detailed in **Table 1**, on page 3.

Main Report

Background

1. Charges for the provision of sports facilities and other items are usually reviewed annually. The charges for the 2016-17 were approved by your Committee on 7 March 2016. There was no review in 2017-18.
2. The City of London Corporation's financial regulations require all departments to recover full costs when setting charges to persons or external organisations or submit reasons to the appropriate committee when that objective is not met. Therefore, it is, at the discretion of individual spending committees to determine the actual level of fees and charges relative to the services they provide, after considering local matters and priorities.
3. Croydon Rugby Football Club rent space for one rugby pitch at Spring Park and Caterham Pumas Football Club rent space for a football pitch on Coulsdon Common. These pitches are cut at the start of the season, after which the clubs are responsible for marking and maintaining them.
4. Logs, charcoal or cord wood may be produced as a by- product of land management activities. The Commons has a policy for the disposal of surplus timber arisings that allow The Commons volunteers to obtain logs free of

charge and staff to get green cord or logs at a discount. Logs are not sold directly to the public.

5. The Division has rooms suitable as meeting venues to external groups. The rooms at Burnham Beeches, Merlewood and Ashted are available to use free of charge by groups whose activities contribute to the management of open spaces. All other groups are charged
6. The basic rate of VAT is added to the cost of services associated with room hire. VAT on solid fuel is charged at 5% and seasonal rental of sports pitches is zero rated subject to HMRC conditions being met.

Current Position

7. The income generated from sports and miscellaneous charges provides a small, but steady income from very little outlay or risk. This amounted to £2063.80 in this financial year and reporting up to 28th December 2018.
8. City of London employees pay £22.00 per ton inclusive of VAT for green cord wood.
9. The football and rugby pitch charges have, historically, been a 'one off', season long payment and is included in the sum quoted in point 7.

Proposals

10. The charges agreed for the 2016-17 financial year are currently being applied and are shown in the table below, together with the proposed charges for the next financial year 2019-20.
11. It is proposed that all charges for the financial year, 2019-20 are increased by 10%. This is above inflation but reflects that there was no review of charges for the previous financial year.
12. It is proposed that room hire at Burnham Beeches increases by 10% on a sliding scale, depending on number of attendees, up to a maximum of £302.00 for a full day.
13. The sports pitch charges do not reflect the fees currently charged by neighbouring Local Authorities and we plan to engage in consultation with the sports clubs concerned to address this prior to the next iteration of this report.
14. The proposed charges include 'rounding up' to simplify transactions.
15. An administration fee of £50.00 will be applied to all licences.

Table 1

Item	2016-18	2019-20
<u>Sports charges</u>		
Spring Park, 1 Rugby Pitch (season)	£255.00	£280.00
Coulsdon Common, 1 Football Pitch (for season)	£272.00	£300.00
<u>Miscellaneous Charges</u>		
Sale of split logs, per 3 ton	£86.00	£95.00
Sale of green cord wood per ton	£22.00	£24.00
Room hire at Ashtead and Merlewood – per hour	£32.00	£35.00
Room hire at Burnham Beeches	Half day £110.00- £138.00 Full day £220.00 - £275.00 and £3.30 +VAT a head for refreshments	Half day £121.00 - £152.00 Full day £242.00 – £302.00 and £3.60 + VAT a head for refreshments

Corporate & Strategic Implications

16. These charges support the Corporate Plan objectives 2018-23 ‘People enjoy good health and wellbeing’ and ‘Communities are cohesive and have the facilities they need’.

Implications**Financial**

17. Increasing the charges by 10% will ensure that costs are fully recovered for the provision of sports facilities and miscellaneous items for the 2019-20 period and a modest contribution is made to income beyond that point.

Conclusion

18. It is proposed that charges for sports pitches and miscellaneous items are increased by the amounts shown in the tables above.
19. The sports pitch charges do not reflect the fees currently charged by the Local Authority neighbours. We plan to engage in consultation with the sports clubs concerned to address this prior to the next iteration of this report.

Hadyn Robson
Business Manager
The Commons

T: 01372 279083

E: hadyn.robson@cityoflondon.gov.uk

Agenda Item 8

Committee:		Date:
Open Spaces and City Gardens - For Decision		10 December 2018
Hampstead Heath, Highgate Wood and Queens Park - For Information		13 March 2019
Epping Forest and Commons Committee - For Information		14 January 2019
West Ham Park - For Information		04 February 2019
Port Health & Environmental Services - For Information		15 January 2019
Subject: Tree Pests and Diseases: Oak Processionary Moth urgent update		Public
Report of: Colin Buttery – Director, Open Spaces		For Decision (Open Spaces & City Gardens Committee)
Report author: Colin Buttery – Director, Open Spaces		

Summary

This report provides Members with an update on the challenges being faced due to the spread of Oak Processionary Moth (OPM) across the Open Spaces in the care of The City of London. The OPM caterpillars shed irritating hairs that can cause allergic reactions in people and dogs.

The report also highlights the resource issues with expenditure in the financial year 2018/19 approaching £100,000 across the Open Spaces. It is anticipated that the resource demands for the control of OPM in future years will be in excess of £250,000 pa. It is proposed that these new and increasing resource commitments are highlighted through the Chamberlain to the Medium-term Financial Planning Process scheduled for January 2019.

Recommendation

Members are asked to:

- Note the challenging position regarding the spread of Oak Processionary Moth (OPM) and the partnership work being undertaken with the Forestry Commission.
- Note that the cost of risk based OPM control undertaken in 2018/19 is likely to lead to a small departmental overspend at the year-end.
- Approve the submission of a bid for additional resources to Resource Allocation Sub Committee for future financial years from 2019/20, highlighting OPM as a new and significant resource demand in the medium-term financial planning process.

Main Report

Background

1. Oak Processionary Moth (*Thaumetopoea processionea*) (OPM) was accidentally introduced to the UK from Europe through the importation of oak trees for a development site in Richmond, West London in 2006. In a short space of time OPM had spread to a wide area of the Borough of Richmond and by 2008 was found in Richmond Park and Kew Gardens.
2. OPM is a pest species that feeds on oak trees and in extreme numbers can result in the defoliation of a tree. However, the main reason for seeking to control the spread and numbers of OPM caterpillars is that the irritating hairs on the caterpillars and within the communal nests, represents a public and animal health hazard through allergic reactions.
3. The City of London has been working closely with the Forestry Commission, Natural England, National Trust, The Royal Parks, Local Authorities and other land owners to share scientific data and research, practical experience and good practice. Public Health England has also been involved in advising on health issues and the Forestry Commissions communications including: “*Spot it, avoid it, report it*” public awareness campaign. Information has been sent to GP’s across London and Veterinary surgeries have also been contacted to make vets aware of the symptoms and risk primarily to dogs.
4. The City Corporation Chairs the Oak Processionary Moth Strategic Group which helps the Forestry Commission engage with landowners, share the strategic direction being taken by Defra and promote best practice.
5. Control methods have primarily focussed on two approaches; nest removal or pesticide spraying with *Bacillus thuringiensis var kurstaki* (known as Bt) a bio-pesticide. The bio-pesticide is applied in early spring as soon as the eggs hatch and the initial instars (developmental stages) of the caterpillars emerge. Neither approach is 100% effective and the aim of both techniques is primarily to protect public health and reduce the rate of spread of the pest.
6. The City Corporation has taken a risk zone-based approach targeting OPM in areas where the public would be most at risk of being exposed to the caterpillars or nests. This includes removal of nests close to busy locations such as car parks, key paths and buildings, catering facilities, children’s play and sporting facilities.
7. The use of the bio-pesticide (Bt) in the Spring where OPM has already been identified is also carefully targeted. Spraying is kept to a minimum because of its impact on non-target species of Lepidoptera such as butterflies and native species of moth. The collateral damage to the wider biodiversity of a site is a concern with many of the Open Spaces protected through statutory designations such as Sites of Special Scientific Interest (SSSI), National Nature Reserves (NNR), and sites of Special area of Conservation (SAC).

8. The Forestry Commission and Forest Research are undertaking a regional pheromone trapping programme with support from Cambridge University. This work is helping to monitor the spread of the pest species and the density of the populations. Research is also being undertaken to consider if there are other viable control methods including natural predators.
9. In reducing the human health risks, we are recognising that City of London Arboricultural Officers and Contractors are at an increased occupational health risk. Where these risks are identified, robust measures are in place to ensure correct protective clothing and good operational practices are in place. Experience across London is that despite these measures individuals may become sensitised to the irritating hairs from the caterpillars and that this can result in unpleasant rashes.
10. To date reports of health issues affecting the public on City Corporation sites is very low, but we are now reaching a 'tipping point' at some properties, such as Hampstead Heath, where nest numbers have grown exponentially in 2018. At Ashtead Common; the City Cemetery & Crematorium and Epping Forest numbers are currently relatively low, but these properties are likely to follow the same trajectory of large increases in the number of OPM nests and distribution of this pest species over the next few years.
11. The staff time resource and contractor costs will also increase markedly even with the targeted risk zone approach being taken. Officers have attended OPM training sessions and volunteers have also been trained how to identify the OPM nests to assist in the reporting of infested trees. The presence of OPM also impacts on normal arboricultural work including tree safety and veteran tree management. Contractors and Officers from the Corporation have to be aware of OPM as a risk and remove nests before undertaking tree surgery works.
12. To help illustrate the significant change that has taken place in 2018 the figures from Hampstead Heath, Highgate Wood and Queens Park below show the number of nests identified in each year since 2015;

Year	Nests	Trees affected
2015	15*	13
2016	25	20
2017	184	84
2018	2013	680

(*it is likely that OPM arrived at Hampstead Heath in 2014 but was only identified in 2015. Targeted spraying of the pesticide Bt from 2016 will have helped to limit the expansion of the OPM population)

A similar pattern of growth in population was experienced at Ashtead Common where the number of OPM nests grew from 6 in 2016; to 16 in 2017; and 184 in 2018.

13. The Forestry Commission has served under the Plant Health Act 1967, Statutory Plant Health Notices (SPHNs) on the City Corporation, requiring the removal the infestations. Failure to comply with a notice can result in enforcement action and possible prosecution. Landowners need to be able to demonstrate that reasonable steps have been taken to control the pest.

Financial Implications

14. The annual spend on contracted services for the control of OPM across the Department will be close to £100,000 in 2018/19 which is close to a ten-fold increase in expenditure on OPM compared to 2017/18. The spend is made up of nest removal, pesticide spraying, pheromone trapping and survey inspections across the Divisions as follows: Ashted Common £29,000; City Cemetery £5,000; Hampstead Heath, Highgate Wood and Queens Park £56,500; City Gardens £1,000; Epping Forest £8,000; a total spend in 2018/19 of £99,500.
15. It is anticipated that annual spending on the control of OPM will increase to a figure of circa £200,000 in 2019/20 and plateau at approximately £250,000 to £300,000 in subsequent years. Partner organisations, such as the Royal Parks, have already seen a similar growth in resource commitment having been affected by OPM for a much longer period.
16. The department is profiling a small overspend for the financial year 2018/19 identifying the expenditure on OPM and certain other areas of exceptional spend including the grass and heathland fires experienced in the summer of 2018.
17. It is also proposed that the need for additional resources from financial year 2019/20 onwards is highlighted to Resource Allocation Sub Committee when it considers the medium-term financial planning process in January 2019.

Corporate & Strategic Implications

The Corporate Plan

18. The Open Spaces Department actively contributes to the following Corporate Plan 2018-23 aims and outcomes:

Contribute to a flourishing society

- People enjoy good health and wellbeing
- People have equal opportunities to enrich their lives and reach their full potential
- Communities are cohesive and have the facilities they need

Shape outstanding environments

- We inspire enterprise, excellence, creativity and collaboration
- We have clean air, land and water and a thriving and sustainable natural environment.

- Our spaces are secure, resilient and well-maintained

Support a thriving economy

- Our land management supports local businesses and enterprises

Tree pests and diseases including OPM are identified in the Departmental risk register; OPM represents a significant risk to our ability to deliver key outcomes identified in the Corporate Plan. OPM control measures are needed to allow the public to continue to enjoy the natural environments, whilst protecting public health and wellbeing.

Conclusion

19. The expansion of the range and distribution of OPM across London is resulting in the need for targeted control measures to be undertaken across the Open Spaces. The risk zone-based approach is a pragmatic and effective way to address the public health risk and target necessary resources.
20. In the early years of the OPM infestation the costs of control have been accommodated within the existing resource budgets, however, in 2018 expenditure has reached a quantum where such costs cannot simply be absorbed. It is proposed that the additional resource requirement is highlighted through the medium-term financial planning process.

Colin BATTERY

Director of Open Spaces
Open Spaces Department

T: 020 7332 3033

E: colin.battery@cityoflondon.gov.uk

This page is intentionally left blank

Committee(s)	Dated:
Epping Forest and Commons	14 01 2019
Subject: Epping Forest - Superintendent's Update for October to November 2018 (SEF 01/19)	Public
Report of: Colin Buttery, Director of Open Spaces	For Information
Report author: Paul Thomson – Superintendent of Epping Forest	

Summary

This purpose of this report is to summarise the Epping Forest Division's activities across October to November 2018.

Of particular note was a continuing reduction in fly-tipping; a new lichen record for the Forest; the completion of a new cattle-handling system at Great Gregories; a successful Team award for Innovation presented to the conservation grazing Team; approval by the District Council of the Interim Mitigation Strategy for the Epping Forest SAC; the successful completion of a 128 hectare grass-cutting season and a popular series of art installations and exhibition commemorating the centenary of the First World War.

Recommendation(s)

Members are asked to:

- Note the report.

Main Report

Staff and Volunteers

1. A further Enforcement Officer joined the Forest Services Team in October 2019.

Budgets

2. At the end of November, Epping Forest was at 60% spend against a profile spend of 66%, indicating a small underspend at this point. The underspend reflects scheduled work plans for wood pasture restoration this winter and the scheduling of works to redress the Wanstead Flats fire damage. There has also been some overperformance on income related to the repeated extension of the Bury Road TfL works compound and the successful renegotiation of the three mobile phone mast rental agreements.

Weather

3. October 2018 saw just below average rainfall. Total monthly rainfall (55.4 mm) was 7.4% below the average rainfall recorded for October in Epping Forest since 1979 (59.8 mm). This is the fourth year in a row where October rainfall has been below average. There were 19 days of rainfall in total, the wettest day being 14th October, which saw 24.4 mm of rainfall.
4. November 2018 saw higher than average rainfall in Epping Forest. Total monthly rainfall (79.2 mm) was 19.8 % above the average rainfall recorded for November in Epping Forest since 1979 (66.1 mm). There were 20 days of rainfall in total, the wettest being 10th November, which saw 29.8 mm of rainfall.
5. Epping Forest was largely unaffected by Storm Callum 12-14 October.

Epping Forest Projects

Parklife

6. Consultants QMP have continued working on the feasibility studies for Artificial Grass Pitch Provision at both sites, Aldersbrook and Harrow Road. Studies/surveys completed so far are topographic, ecology, arboriculture and transport. The consultant's final report is due in mid-January.
7. Officers have been working with the Football Association to ratify current usage at Wanstead Flats to ensure demand modelling is accurate. The FA use team affiliation data but not all teams choose to affiliate. Over 70 teams are missing from the data with 38 Adult and 37 Junior teams identified as playing at Wanstead Flats (home ground) but unaffiliated.

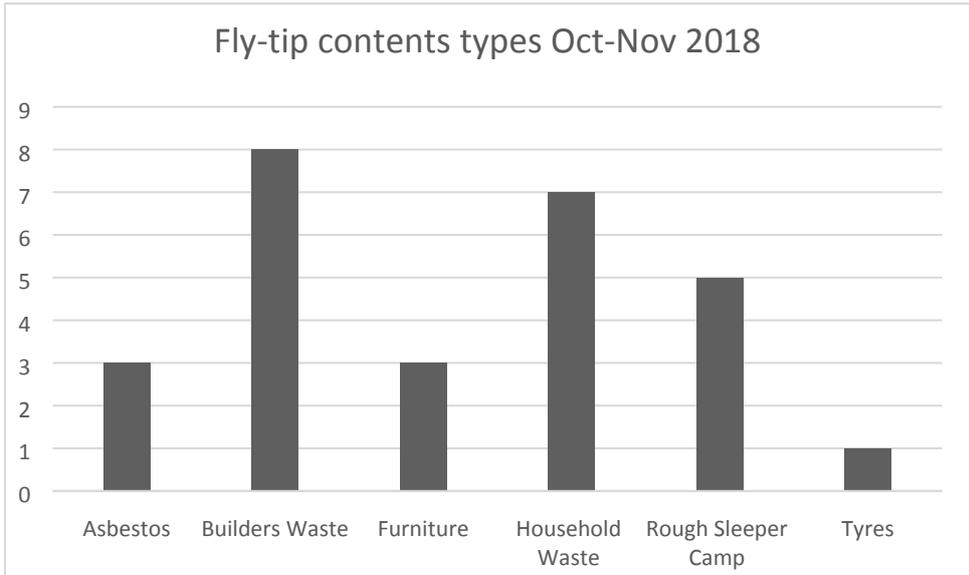
Epping Forest Heritage Trust Duck Champions Project

8. EFHT have been working with Officers to fund several interpretation signs to be displayed at ponds where over-feeding of ducks, geese and swans is apparent.
9. The final number of signs is funding dependent and yet to be agreed but Officers are confident signs will be installed at Eagle Pond, Alexandra Lake and Hollow Ponds as a result.

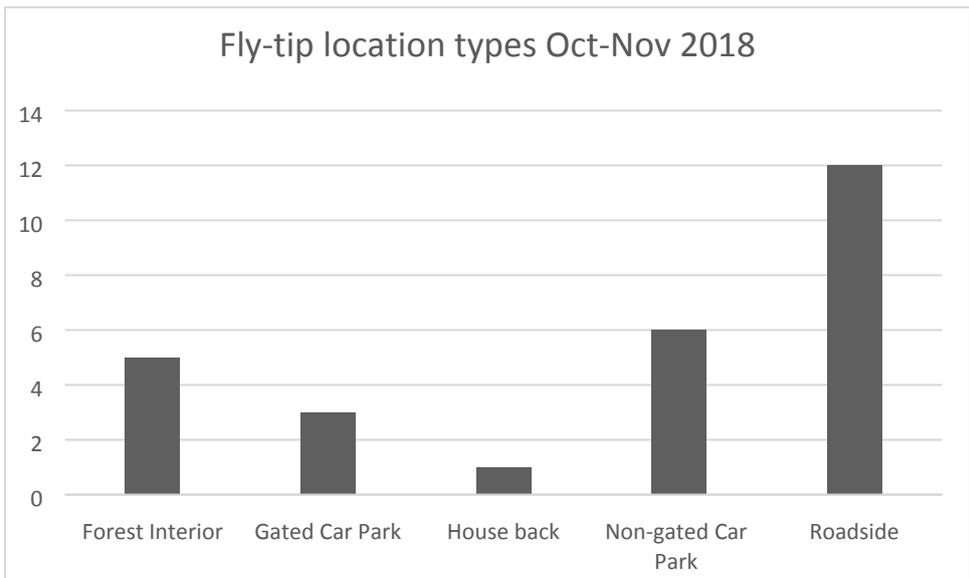
Forest Services

Fly-tipping

10. There were 27 fly-tips over the Oct/Nov period of 2018, which is 68% decrease on the same period last year. However, there were three asbestos tips which are very expensive to collect, the total of the three tips costing £1,855 to remove (this cost equates to the disposal of 13.25 tonnes of non-hazardous waste which costs £69.50 per 500 kilo). There have been significant steps taken to increase security of Forest locations over the recent months, which may have contributed to this figure, it is becoming more obvious that the locking of car parks is displacing fly-tipping to neighbouring areas.

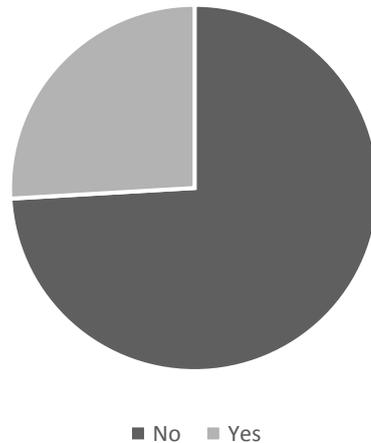


11. Builders waste and Household waste remain the most commonly tipped items representing 30% and 25% respectively.



12. Roadsides remain the most vulnerable place in the Forest for security and represents 45% of the fly-tips that occurred over the period.

Fly-tips in Wanstead Flats area Oct-Nov 2018



13. Some 25% of all tips occurred in the Wanstead Flats area. It is hoped the repositioning of the Belgrave Road Wayleave gate nearer the roadside will make it more difficult to park and therefore help reduce or stop fly tipping, as well as the placement of a licenced and staffed compound at Centre Road.

Enforcement Activity

14. There were no prosecutions for the reporting period.

Rough Sleepers

15. Four Rough sleeper camps were found in the following areas:
- Rear of the City of London Cemetery: 1 tent occupied by 1 male.
 - The Triangle, Wanstead Flats: 1 tent occupied by a couple.
 - Wanstead Flats opposite the City of London Cemetery: 1 large tent occupied by two males.
 - Forest Glade E11: 2 tents occupied by 2 males.
16. All the occupants were offered and given assistance by Redbridge Homeless Team or St Mungo's Homeless Charity. There should be a decline in rough sleeping over the winter months due to the adverse weather and the opening of seasonal night shelters.

Licences

17. A total of 28 licences for events were issued during the two months being reported, which yielded an income of £21,005.42 plus VAT. 32 licences were issued during the same period in 2017 yielding income of £131,774 (which included one compound of £124,670 and one compound of £1,020.00).

Unauthorised Occupations

18. There have been no traveller incursions over the period. In partnership with the London Borough of Redbridge, the City Corporation has seen the inclusion of parts of Woodford Green and George Green in the London Borough of Redbridge's High Court Traveller Injunction.

Dog Incidents

19. There were no incidents recorded during this reporting period.

Deer Vehicle Collisions

20. Over the period of October/November, there were 5 recorded incidents of deer vehicle collisions.

Heritage; Landscape and Nature Conservation

Biodiversity

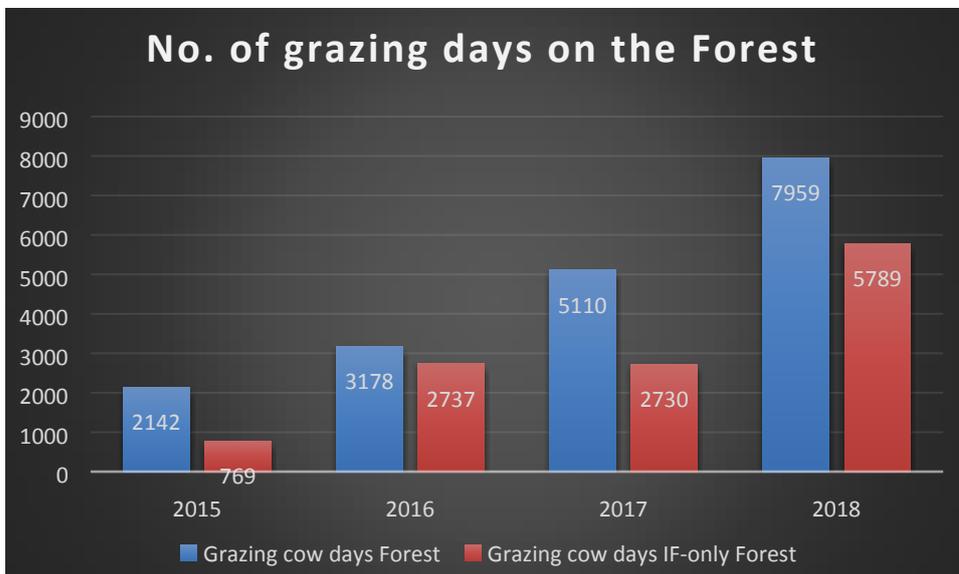
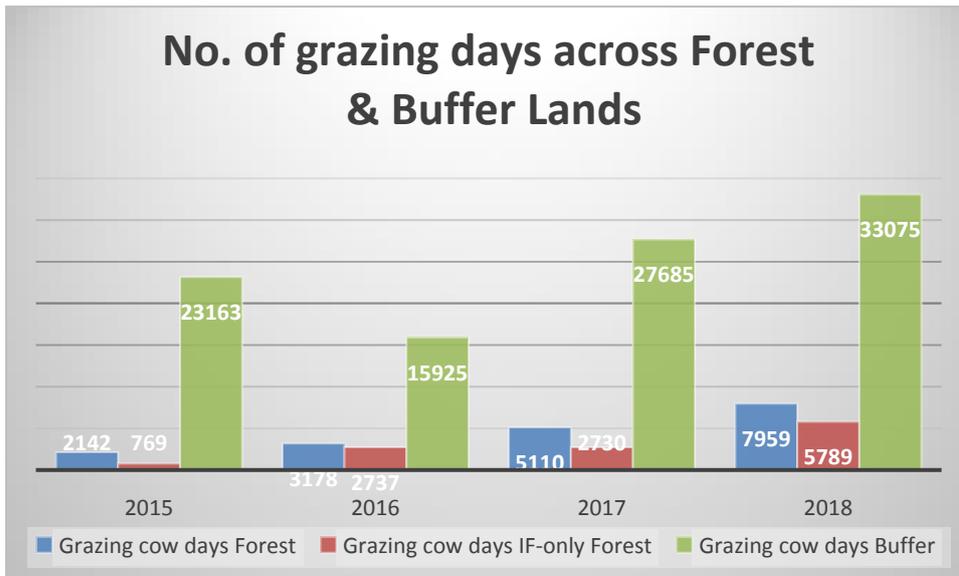
21. *Sarcosagium campestre*, a new lichen record for the Forest. Found by Essex lichenologist John Skinner. There are only three other records for East Anglia after 2000.

Agri-environment Schemes

22. The Environmental Stewardship Officer assisted the Remembrancer's Department with the City of London's response to a consultation on the Agriculture Bill.
23. A consultation was initiated with Epping Forest Commoners regarding the exercise of their grazing rights, for the purposes of the new Countryside Stewardship. A small number of Commoners indicated they might be considering grazing during 2020-2030 and have been contacted to discuss their plans.

Grazing

24. The cattle handling installation at Great Gregories Farm has been installed by contractors in the Top Shed. The system is designed to work with the animal's natural behavioural instinct to improve safety and welfare for both animal and staff.
25. The Grazing and Landscape Project Officer arranged a site visit for retired-Verderer, Commoner and honorary Reeve Michael Davies. As Verderer, Michael Davies had supported the return of traditional commoners' grazing and provided his own herd of cows for many years to graze sites across the Forest. On this visit, he was shown several key grazing sites across the Forest and Buffer lands, including Gt Gregories Yard cattle buildings, and viewed the new calves recently born into the Epping Forest conservation herd of English Longhorns.
26. The Longhorns had been moved to fields surrounding Great Gregories Farm in September in preparation for calving and by 30th November the majority of animals were in pens at Great Gregories, with 25 calves born and more expected during December.
27. Several thefts of electric fencing equipment took place on the Buffer Lands at Warlies Estate and Great Gregories Fields.
28. A record number of grazing days was achieved across both the Forest and Buffer Lands this year, and more than 70% of Forest grazing was achieved within invisible-fenced areas, another record achievement.



29. To cap a successful grazing year, The Grazing Team won the City of London staff team award as part of the 'Celebrating Our People' Awards, against tough competition across the whole of the City Corporation. The Team was awarded top position for "Innovative and Improved / new ways of working". The Stockman attended and received the award on behalf of the team. The subsequent article about the team's success was the most read article on the City's intranet site across the following week.

Heritage

30. Further fieldwork by your officers was completed on Copped Hall to help inform the draft Conservation Management Plan (CMP) and, in particular, the proposed restoration of the parkland and treescape of this historic Grade II* listed Park and Garden. The CMP will be brought to your Committee in 2019 for review and consideration.

Contractors

31. Contractors have undertaken work at four key sites across the Forest's wood-pasture: Lords Bushes, Bury Wood, Pole Hill and Honey Lane as part of the Higher-Level Stewardship Scheme. There has been some localised concern expressed about the amount of work completed at Lords Bushes recently, and a number of site meetings were held, or have been planned, to explain the works and future proposals. Following 15 years of wood-pasture restoration there, further engagement with local residents is planned for the New Year.

Land Management

Town & Country Planning – Forward Planning – Local Plans

32. Epping Forest District Council's full Cabinet met on 18th October and approved the interim Mitigation Strategy to protect Epping Forest Special Area of Conservation (SAC). The core of this Strategy, the on-site mitigation proposals to reduce the impacts of recreation, had been prepared by your officers and were incorporated in their entirety in the Council's Strategy.
33. On 28th November the Inspector, appointed to examine the EFDC Local Plan, published the dates of the many hearings that will be held to consider the Plan Policies. There are hearings programmed for mid-February, March and mid-May. A separate report on the EFDC Local Plan has been prepared for your committee's consideration.

Town & Country Planning – Development Control

34. Proposals for a new Next plc storage and distribution centre at Dowding Way close to Junction 26 of the M25 have been released. The 80,000 m² of warehousing on the 14-hectare site is of concern because of the adverse impacts from the traffic generated by the site, especially HGVs, would have on the Forest's environment and tree health. A detailed response was made to this proposed development in November and subsequently was quoted in the local press.

Land Registration

35. Following the submission of Statements of Case in the last reporting period, witness statements were completed in November and filed with the Lands Tribunal for the Broomhill Road, Woodford Green case which will be heard in the early part of 2019.

Operations

Habitat Works

36. **Grass cutting** - The annual grass cutting program by staff of some 128 hectares of amenity and conservation land has been completed on schedule. In addition, because of the dry conditions we have been able to undertake additional cutting work on the buffer lands in support of the grazing operation, with cutting of coarse grass and bramble areas.

37. The primary focus of arborist staff has been the final works to complete the ten-year program of Wood Pasture restoration. As at the end of November teams still had around a month of work to go with the possibility of some smaller operations to be scheduled for later into 2019.
38. Highams Park Lake: Working together with the volunteer group, the Highams Park Snedders, staff continued with the program of works to strengthen the views linking the formal park managed by the Local Authority and the City Corporation's land at Highams Park. Revised fencing has been installed around the reservoir draw down structures as the former fences were prone to vandalism/theft. A small but important success was that following fencing of the dam boundary and reseeding of worn sections on the dam face we have seen much improved grass growth on the dam. This has previously been a concern of the inspection engineer on his six-monthly visits.

Risk Management Works

39. **Tree Safety** The annual program of works largely continues on schedule. The main area of delay is the working of the Churchill Poplar Avenue where a public consultation exercise first needs to be undertaken as outlined in the May 2018 Work program report to your Committee.
40. **Highway Verge management:** Highway verge management was slightly delayed this year with our contractor starting work late in the season. This work is now largely complete with some areas left for December. This is the first year of a three-year contract and we will be holding a performance review meeting in the New Year to agree a better way forward.

Visitor Services

Chingford Golf Course

41. The Head Green Keeper and his team continued to clear leaves from fairways and ditches to help improve playability and speed of play. The spraying programme has continued to help prevent any diseases on the greens. Tees were spiked to help break up compaction and allow air and water into the root zone to promote better growth. Work was carried out on creating a new path between holes 2 & 3 within the course boundary. Severe motorbike damage occurred on the 5th green, repair work has been carried out as best as possible for this time of year and more repair work will be carried out early spring next year to try and restore the green back to its normal high standard.

42. Total revenue from online sales this period is £5,364.50, total revenue from reception was £42,835.27 broken down into:

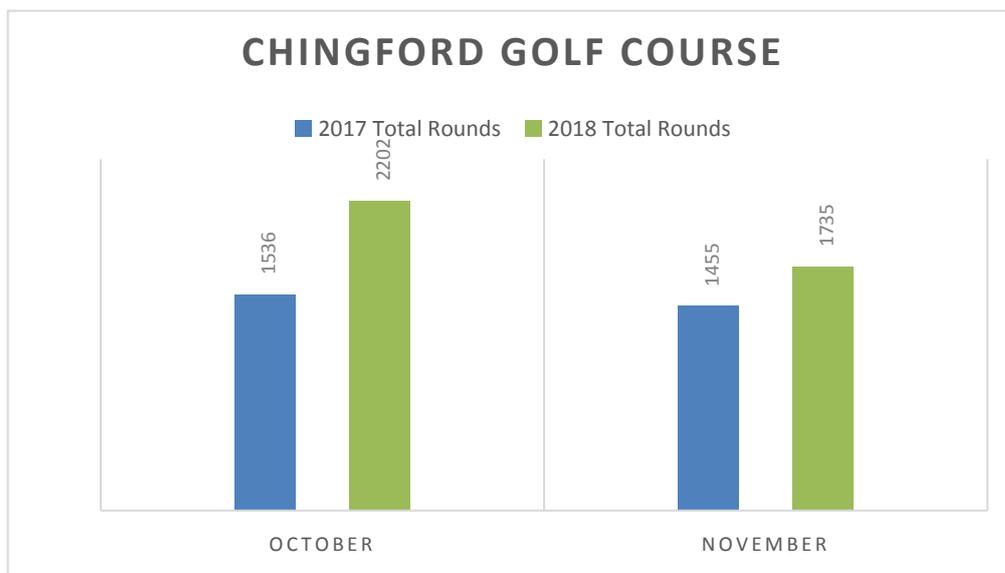
Breakdown of figures from Reception			
	2018/19	2017/18	Difference (+/-)
Green fees:	£33,889.80	£32,131.68	+£1758.12
Drinks:	£869.20	£740.70	+£128.50
Hire Equipment:	£4066.50	£4477.00	-£410.50
Shop Sales:	£2517.45	£2603.75	-£86.30
Wanstead:	£1044	£670	+£374.00
Horse Riding:	£452.02	NA	+£452.02

43. Compared to last year the total difference in revenue equates to an increase in income of £3,735.64. (8%)

44. Online bookings for the same period last year was £3,413.50 compared to £5,364.50 this year, making an increase of £1,951 (57%).

45. Total revenue from reception last year was £41,050.63 compared to £42,835.27 in the current year, an increase amounting to £1,784.64. £452.02 of this year's takings is however from horse riding licences, which was administered from The View in previous years

46. The number of rounds for October & November last year was 2,991. This year number of rounds for October & November was 3,937. This represents an increase of 946 (32%).



Wanstead Flats Football

47. Seasonal pitch booking payments have been received with some hirers opting for a split payment option. Currently there are no outstanding debts.
48. The new 3-week rota has also seen improvements for hirers and staff. The on-duty greens/grounds keeper is supported by casual caretaker staff across sites which allows better operational consistency and the staff have 2 weekends in 3 off-duty.
49. Parkrun attracted 1,857 runners over October and November, up 250 runners on the same period last year.

Visitor Numbers

50. Visitor numbers remain lower than last year. In part this may be due to the finer weather as people are more likely to just have an 'outdoor' visit. Wedding bookings are less frequent as we were unable to take bookings during the limewashing works for The Hunting Lodge. There were also less events held in half-term.

Visitor Numbers	QEHL 2018	2017	View	2017	Temple	2017	High Beach	2017	Total	Total 2017
October	1680	2594	3209	4519	0	744	2043	2569	6932	10426
November	1103	1775	2877	2956	132	649	1467	1757	5579	7137

Visitor Services Events

51. Approximately 4,000 people attended the Epping Forest Fair over the weekend of 8 / 9 December, including 500 children paying to visit the Father Christmas' Grotto in The View. The Festive Fair was free and craft activities were provided by the CoL Open Spaces Learning Team. The Field Studies Centre led woodland walks and Suntrap Forest Centre brought along a variety of reptiles and insects for handling. Stall holders and caterers provided local, hand-crafted items for sale and food / drinks. Local choirs provided traditional Christmas carols, and a snow machine provided a wonderful, festive atmosphere for all to enjoy. Wellgate Community Farm attended with their petting farm and the Hunting Lodge was seasonally decorated with greenery along the theme of a 'Midwinter Night's Dream with storytelling and craft activities a local community farm.
52. London Borough of Waltham Forest Adult Learning ran three afternoon Art Workshops at The View in October: Start Painting the Forest. These were the first charged sessions that were offered and the organisers paid for room hire.
53. On Friday 12 October, the Museum and Heritage Manager was invited to give a talk on Audience Development in Epping Forest to the London North and East

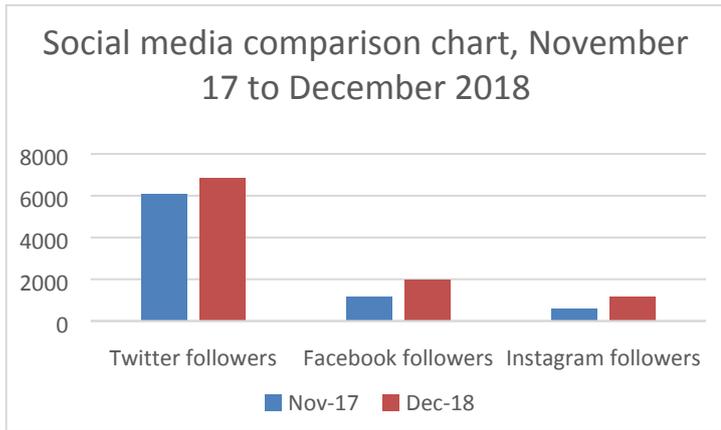
Museum group meeting at Alexandra Palace. This was a useful opportunity to promote what we do, and learn from, other small museum services. The Manager also gave a talk on *1878: Saving the Forest* to Woodford Historical Society as part of the 140th anniversary of the Epping Forest Act programme.

54. *Children's Games: What we used to do*, was the theme of the October half term family drop in activities at Queen Elizabeth's Hunting Lodge and The View.
55. As Epping Forest's contribution to the centenary remembrance of the end of the First World War, Visitors Services offered an exhibition and related activities, entitled 'Returning from the War: Beyond the 11th Hour', from 1 November, at The View. The exhibition was replicated at The Temple. The exhibition told the story of Forest Keepers and their war stories and invited visitors to ponder the impact of the War on their own families via a 'Family Story Tree', war poems and age appropriate children's activities. The duration of this popular exhibition has been extended to the end of the year. This exhibition was enhanced by the installation of six '*There but Not There*' wire 'Tommy' figures installed at The View, Pole Hill, High Beach and three war memorials on Epping Forest land.
56. The Temple was reopened, one weekend in four, on 10/11 November. Interpretation at The Temple was refreshed with some linked object displays telling various strands of the Wanstead Story: including the Orangery, The Temple as menagerie. Staff worked with Friends of Wanstead Parklands to create a story-telling area and displays.
57. 10 November to 27 January, an exhibition at The View shows photographs of Gayle Chong Kwan's *The People's Forest*. This multi-venue art project funded by Arts Council, Barbican and William Morris Gallery, inspired by the popular campaign to save the Forest, included activities in the Forest and forest staff as inspiration for fantastic headdresses displayed at the William Morris Gallery earlier in the year. This theme is to be continued as part of the London Borough of Culture forest theme in 2019.
58. On 12 November Rutgers American drama students studying at The Globe returned to the Forest for the fourth year on a paid walk and talk around Queen Elizabeth's Hunting Lodge and Barn Hoppitt. This now annual visit enables us to maintain useful links with The Globe and to reinforce narratives about the use of the Hunting Lodges stairs at The Globe, limewashing and the important influence of the Forest as a Shakespearean theme.

Communication and Information

59. As of 13 December 2018 our social media following is:
 - Twitter followers: 6,843 (12.1% increase)
 - Facebook followers: 1,979 (71.9% increase)
 - Instagram followers: 1,164 (100% increase)

60. The chart shows a comparison of our figures at the same point in 2017:



61. The Top Tweet for November 2018 with 7,484 impressions was:

We would like your help...This aircraft related fly tip was dumped in The Lower Forest earlier this week. Please share and let us know if you have any information which may help our investigation. Thank you in advance. [#TreesNotTrash](#)
[#EppingForest](#)
pic.twitter.com/kRv7TmSUVO



↩ 5 ↻ 59 ❤ 15

62. The Top Tweet for October 2018 with 9,287 impressions was:

Nature and the outdoors can help with anxiety and depression.

If you need a quiet walk, somewhere to exercise, or just time out to sit and watch the world and be yourself, [#EppingForest](#) is always here for you.

cityoflondon.gov.uk/eppingforest

[#WorldMentalHealthDay](#)
pic.twitter.com/veE7Dmz5PC



↩ 4 ↻ 43 ❤ 83

Major incidents

63. There were no major Forest incidents.

Appendices

- None

Paul Thomson

Superintendent of Epping Forest

T: 0208 532 1010

E: paul.thomson@cityoflondon.gov.uk

This page is intentionally left blank

Committee(s):	Date(s):
Epping Forest & Commons	14 01 2019
Subject: Epping Forest District Council Local Plan – Examination in Public (SEF 03/19)	Public
Report of: Colin Buttery, Director of Open Spaces	For Decision
Report Author: Jeremy Dagley – Head of Conservation, Epping Forest	

Summary

Epping Forest District Council (the Council), whose boundary includes 64% of Epping Forest, submitted its Local Plan to the Secretary of State on 21st September 2018. Subsequently, dates for an Examination-in-Public (EiP) have been published. This report seeks your Committee’s approval for officers to attend the hearings of the EiP to ensure that The Conservators’ representations on the Local Plan, and the associated interim Mitigation Strategy, are heard and that a dialogue is continued with the Council.

This dialogue is important to ensure that a full and effective Mitigation Strategy is approved and that any development proposals likely to have adverse impacts on the Forest are avoided, mitigated or withdrawn from the Local Plan. This dialogue would be in line with the express intentions of the Memorandum of Understanding (MoU) for the protection of the Epping Forest Special Area of Conservation (SAC), to which The Conservators’, the Council and three other local authorities are co-signatories.

Recommendation(s)

Members are asked to approve:

- the proposals encompassed in Option 17 c)i) & ii), namely that officers attend the EiP to represent The Conservators’ responses on the Local Plan, to advocate off-site avoidance measures and to respond to any new information from the Council or questions from the Inspector on other matters related to The Conservators’ representations;
- under the terms of the approved MoU, that officers continue to work with the Council and other local authorities to create a full and effective Mitigation Strategy, including consideration of off-site measures on the Buffer Lands and other sites;
- that officers report back to your Committee on the outcome of the Examination-in-Public and the Inspector’s findings and main modifications;
- that officers bring forward any proposed full Mitigation Strategy for your approval.

Background

1. Epping Forest District Council (the Council), whose boundary includes 64% of Epping Forest, published its Local Plan, under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations (2012), in mid-December 2017. It sought representations from the public and other bodies, under Regulation 20, over a 6-week period that concluded on 29 January 2018.
2. In the development of this submission version Local Plan the Council, along with three other local authorities, signed a Memorandum of Understanding (MoU) in 2016 with The Conservators and Natural England to ensure the protection of Epping Forest Special Area of Conservation (SAC) from any adverse impacts resulting from the Local Plan proposals (see *Background Papers* below).
3. In line with the MoU, the Regulation 20 response on behalf of The Conservators was made by the Town Clerk under delegated authority, in consultation with the Chairman and Deputy Chairman, on 29 January 2018. This was reported to your Committee in March, with the detailed response attached as Appendix 1 of that report. This same response letter is now attached to this current report for further reference, also as **Appendix 1**.
4. The Local Plan addresses the next phase of the District's development for the 15 years to 2033, including the allocation of 11,400 new homes, of which nearly 4,378 units are currently allocated within 3km of the Forest's boundaries and the majority, over 6,000, are within 5km. The Conservators' response letter (**Appendix 1**) concludes that the Local Plan is 'unsound' because it is not consistent with national legislation, including The Conservation of Habitats & Species Regulations 2017 (The Habitats Regulations) and is not considered 'justified' or 'sustainable'.
5. Following the closure of the consultation period, the Council sought advice from both your officers and those of Natural England (NE), in relation to proposals for mitigation that might be included in its Local Plan Mitigation Strategy for the Epping Forest Special Area of Conservation (SAC). The Council as the 'Competent Authority' (as defined by The Habitats Regulations) for the SAC in respect of its Plan is required to ensure that adverse impacts on the SAC are avoided or mitigated. NE is the statutory body which advises competent authorities concerning the protection of internationally-important sites from adverse impacts.
6. Your Committee approved delegated authority for the development of detailed proposals for such a Mitigation Strategy at its meeting of 14 May 2018. On the basis of the evidence provided by the Epping Forest Visitor Survey 2017, interim proposals were prepared and submitted to the Council in July 2018. These proposals contained outline costings for on-site operations and activities that would aim to mitigate the additional recreational pressures due to the increase in residential development around the Forest SAC boundaries.

7. The Council accepted the proposals from your officers and included them in its draft interim Mitigation Strategy. This Strategy proposed that the money required for the mitigation work would be raised through tariffs on residential development.
8. The interim Mitigation Strategy was discussed at the Members' Co-operation for Sustainable Development Board (held under the local authorities' Duty-to-Co-operate (Section 110, The Localism Act 2011)) on 10th September. It was agreed that the interim Mitigation Strategy for Epping Forest SAC should be put to the three local authorities for whom tariffs had been identified as necessary for development under their Local Plans.
9. The Council requested that The Conservators also respond to the proposed interim Mitigation Strategy with their views. The Council insisted on a deadline of only a few days (by 14th September) in order to allow an October Cabinet decision.
10. Under delegated authority for developing the mitigation proposals, a response was sent on behalf of the Conservators on 14th September (**see Appendix 2**) outlining support for the contents of the interim Strategy but expressing concern over the lack of a full Strategy to address off-site avoidance measures, as well as adverse air pollution and urbanisation impacts.
11. The most effective off-site avoidance measures are Sustainable/Suitable Alternative Natural Greenspaces (SANGs) and the letter of 14th September reiterated the points made in the 29th January representations, that a SANGs Strategy and SANGs tariff were key to an effective **full** Mitigation Strategy. The 14th September representations also emphasised the continuing importance of the **Buffer Lands** to the protection of the Forest and how these areas could be used to support the provision of SANGs in the Local Plan.
12. The Epping Forest District Local Plan was submitted to the Secretary of State on 21st September 2018, prior to the Council's approval of the interim Mitigation Strategy.
13. Although the Strategy was subsequently approved by the Council's Cabinet on 18th October 2018, it has yet to be approved by the two other local authorities, which were identified in the Strategy as requiring tariffs for their Local Plan developments close to Epping Forest SAC (London Boroughs of Redbridge and Waltham Forest).
14. Furthermore, the interim Mitigation Strategy for the SAC remains only interim because it has yet to deal with the other potential adverse impacts on the Forest of air pollution from traffic and urbanisation effects and, also, it has not dealt with *off-site* avoidance measures. To protect the Forest a full Mitigation Strategy encompassing all these elements is required and, in addition, the outline costings for the recreational mitigation elements need to be subject to detailed appraisal to ensure the full costs are robustly assessed.

Current Position

15. Following the submission of the Local Plan on 21st September a Planning Inspector was appointed and the Plan's Examination-in-Public was confirmed as programmed for early 2019. The details of the hearings, venue and dates were then published on 28th November and Regulation 20 respondents, including The Conservators, were required to confirm their wish to attend Plan hearings by 21st December 2018.
16. Your officers confirmed to the Inspector that The Conservators would wish to be represented on all matters raised in their original submission (**Appendix 1**), and response to the interim Mitigation Strategy (**Appendix 2**), requesting changes to the Plan for which the Inspector has allocated time at the hearings. Currently, this would require your officers to attend on nine of the 15 hearing dates.

Options

17. There are three options available to your Committee:
 - a. **Option A** - to request that officers do not attend the hearings and leave the Inspector to determine the position, in regard to our representations of 29th January and 14th September, from our written submissions alone. **This option is not recommended** because of new information that is likely to be provided by the Council on the issues of air pollution and off-site mitigation, as well as the additional work that has been undertaken by your officers since the 29th January representations (**Appendix 1**). This additional work relates to on-site mitigation and the development of a **full** Mitigation Strategy.
 - b. **Option B** - to request that officers attend all hearings allowed by the Inspector and relevant to the 29th January representations and the subsequent representations related to the Mitigation Strategy (14th September letter at **Appendix 2**) but to make no further representations to the Inspector. **This option is not recommended** because of new information that is likely to be provided by the Council on the issues of air pollution and off-site mitigation, as well as the additional work required to agree a **full** Mitigation Strategy.
 - c. **Option C**
 - to request that officers attend all hearings allowed by the Inspector and relevant to the 29th January representations, as well as our subsequent representations related to the Mitigation Strategy; and
 - to make additional representations, ahead of each of the relevant hearing deadlines, as required, in order to provide additional proposals to better protect Epping Forest from the adverse impacts of proposed development in the Local Plan. **This option is recommended** as it allows a dialogue with both the Inspector and the Council to further develop the Mitigation Strategy towards a **full** Strategy, that would seek to avoid impacts, as well as mitigate them, through off-site provision for recreation and through reductions in air pollution and urbanisation impacts.

Proposals

18. It is proposed that combined Option 17c)i and 17c)ii above is pursued so that officers attend and make representations at the Examination in Public to clarify and reinforce our representations.
19. In addition, it is proposed that further work is done by your officers to develop ideas and promote proposals for off-site mitigation measures (SANGs), including the Buffer Lands, to be considered by the Inspector and the Council.
20. It is proposed that your officers would respond to any new information from the Council about air pollution and traffic impact modelling and provide further representations to the Inspector as required to clarify our position or to propose changes to the approach of the Plan.

Corporate & Strategic Implications

21. **Legal** – none relating to recommendations in this report.
22. **City of London Corporate Plan 2018 - 2023**: the protection of the internationally and nationally-important habitats of Epping Forest directly underscore the *third pillar* of the Corporate Plan, which is to “**shape outstanding environments**”. This *third pillar* of the Corporate Plan is measured by four outcomes. The protection and conservation of the outstanding environment of Epping Forest and its buffer lands contribute significantly to the achievement of two of these: firstly, Outcome 11 “We have clean air, land and water and a thriving and sustainable natural environment” and secondly, Outcome 12 “Our spaces are secure, resilient and well-maintained”.
23. **Open Spaces Department Business Plan 2016-19**: The Strategic Vision of this Business plan is to ‘Preserve and protect our world class green spaces for the benefit of our local communities and the environment.’ and one of the Department Objectives is to ‘Protect and conserve the ecology, biodiversity and heritage of our sites.’ Ensuring The Conservators’ responses are represented at the Local Plan EiP fully supports this objective.
24. **Epping Forest Management Plan, Strategy and Business Plan**: the responses on the Local Plan reflect the objectives of the previous and forthcoming Epping Forest Management Plans. These priorities will reflect the biodiversity and heritage importance of the Epping Forest SAC.

Conclusions

25. Since representations were made under delegated authority on behalf of The Conservators to the Regulation 19 Submission version of the Epping Forest District Council (EFDC) Local Plan, there have been significant developments with regard to on-site mitigation. After the Local Plan had been submitted to the Secretary of State by EFDC (the Council), an interim Mitigation Strategy, containing all on-site mitigation proposals from The Conservators, was approved by the Council’s full Cabinet in October. However, the two London Boroughs

identified as being required to charge mitigation tariffs have yet to approve the interim Strategy.

26. More work is required for a full and effective Mitigation Strategy to be developed to protect Epping Forest. Also, concerns remain over a number of potential significant adverse impacts to which the Local Plan could expose the Forest. However, in the meantime, the dates and hearings for the Local Plan's Examination-in-Public have been announced. This report seeks your Committee's approval for officers to attend the hearings relevant to The Conservators' representations and to ensure dialogues with both the Council and the Inspector are continued. This report also recommends that responses are prepared where new information is provided before or at the Examination-in-Public.

Appendices

- **Appendix 1:** Response of The Conservators of Epping Forest on the Epping Forest District Council Regulation 19 Submission Local Plan (29th January 2018 letter)
- **Appendix 2:** Response to The Conservators of Epping Forest to Epping Forest District Council's interim Mitigation Strategy for the Special Area of Conservation (SAC) (14th September 2018 letter).

Background Papers

- SEF 23/18 EF&C Committee Report: *Proposals for the development of a Mitigation Strategy for the Epping Forest Special Area of Conservation*. 14th May 2018
- SEF 19/18 EF&C Committee Report: *Epping Forest District Council Local Plan – Regulation 19 Consultation, Update*. 12th March 2018
- SEF 12/18 EF&C Committee Report: *Epping Forest District Council – Local Plan – Publication under Regulation 19 of the Town & Country Planning (Local Planning) (England) Regulations 2012 – Request for Delegated Authority*. 15th January 2018
- SEF30/16 EF&C Committee Report: *Epping Forest District Local Plan – proposed Memorandum of Understanding*. 4th July 2016

Jeremy Dagley

Head of Conservation

T: 020 8532 1010

E: jeremy.dagley@cityoflondon.gov.uk



RESPONSE of THE CONSERVATORS of EPPING FOREST on the EPPING FOREST DISTRICT COUNCIL REGULATION 19 SUBMISSION LOCAL PLAN

1. Introduction and context

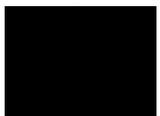
1.1 Epping Forest is owned by the City of London Corporation and comprises some 6000 acres (2,500 hectares). It is supported by a further 1,800 acres (730 hectares) of Buffer Lands, acquired by the City to protect the Forest from encroaching development and to maintain the links between the Forest and the wider countryside. The Epping Forest Act 1878 charged the City, as Conservators of Epping Forest, with a duty to conserve varied vegetation and preserve the Forest's *natural aspect*.

1.2 The Conservators comments, in general, are given in response to the Plan in relation to all Forest Land, whether covered by the Epping Forest Act, the Habitats Regulations 2017 or the Wildlife & Countryside Act 1981 or all of these designations. The Conservators consider that the protection and enhancement of the Forest, as a whole, should be a core aim of the Local Plan.

1.3 For example, whilst an assessment of the impacts on the SSSI is not formally part of the Habitats Regulations Assessment (HRA - Document EB206)), on which we comment in detail below, a consistent approach to both the SAC and SSSI interest features in the Plan is important. In particular, irrespective of any designation, the ancient wood-pasture habitats of the Forest and its network of ancient green lanes are irreplaceable. The European site boundary is clearly part of a wider ecological network and approaches to biodiversity conservation need to be compatible with each other and seek the best outcomes for the natural environment. The ancient green lane network, which is extensive across the District, provides the building block for future, wildlife-rich green infrastructure and green corridors to link other ancient woodlands and other important sites like the Lee Valley.

1.4 In addition, maintaining the same approach to the Forest as a whole would be beneficial for developers and decision makers as it would avoid confusion, would provide clarity and would reduce the amount of SSSI assessment required at the project level.

-----oo00oo-----



2. Overview of impacts of the Plan

2.1 The increased housing proposed in the Plan (21% increase) is a cause for great concern because of the pattern of allocations and their proximity to the Forest, with around 6,000 new homes being planned within 6.2 km of the boundaries of the Forest's Special Area of Conservation and within 5km of protected Forest Land.

2.2 The proposed increased housing so close to the Forest would lead to impacts on the Forest from:

- A. Increased traffic and expanded highways – with air pollution a key concern as well as noise, visual intrusion into the natural scenery and loss of relative tranquility
- B. Increased recreational pressure/demands – with increased costs of management and potential damage to soils, impacts on tree hazard management
- C. Impacts of urbanisation – litter, fly-tipping, alien species introductions, noise (and loss of relative tranquility), impacts on natural aspect and scenery.

3. Summary of issues & concerns:

3.1 The Conservators have previously expressed concern and disagreed with elements of the Regulation 18 Local Plan. Many of these concerns remain with the Regulation 19 Submission Plan and are reiterated in detail below. A key issue is that there is no formal, policy commitment to a **Mitigation Strategy** for the Epping Forest Special Area of Conservation (SAC). We also have other concerns with the soundness of the Submission Plan, including:

1. **Mitigation Strategy** – although a strategy is referred to in the preamble to Policy DM2 and a Visitor Survey has just been completed, with air quality monitoring close to being agreed, there is nonetheless no commitment in Policy to this strategy and no proposals to enact it through a Supplementary Planning Document (SPD).
2. **Mitigation Hierarchy** – without this Strategy in place and with a series of potential significant impacts on Forest Land, the Local Plan currently seems to be already some way down the mitigation hierarchy, which should begin with avoidance measures rather than potential compensation
3. **Habitats Regulations Assessment (Document EB206)** does not provide the required Appropriate Assessment.
4. **Housing allocations (Policy SP2)**– the pattern and density of housing allocations, (Policy SP2) in general and in detail (Policies for Places P1 – P15) are likely to have adverse impacts on the Forest.
5. **Development Management Policies (DM2 & DM22)** – we recommend substantial changes to some Policies, as drafted and, in particular, Policy DM2, on Epping Forest protection and Policy DM22 on Air Quality, neither of which include commitments to a Mitigation Strategy.
6. **Highways capacity (Documents EB502 & EB1101A & B)** – the implications of proposed highways capacity changes included in the Infrastructure Development Plan (Documents 1101A & B) and Highways Assessment (Document EB502), especially at **Wake Arms Roundabout**, have not been appropriately assessed and could cause adverse impacts on Epping Forest.

7. **Green Belt (Policy DM4)** – the loss of Green Belt and the long-term protection of its boundaries and preventing infill of the smaller settlements within the GB remains of considerable concern.
8. **Green Infrastructure (Policies SP7 & DM5)** –the lack of a Green Infrastructure Plan and detail on alternative green spaces to reduce pressure on Forest Land, although we broadly welcome the wording and intent of Policies SP7, DM1 and DM5.
9. **Open Spaces (Policies SP2 & P2)**– we disagree with the loss of open spaces in existing settlements and consider these policies contradict others.
10. **Uncertainties inherent in the Plan** – the level of uncertainty over the long-term protection of the Forest and the under-playing of the importance to the District of the whole Forest (not only the statutorily-designated areas like the SAC)

-----oo00oo-----

4. Policy SP2

4.1 Policy SP2 - Representation on Issues

4.1.1. The Conservators consider SP2 to be unsound because it is not consistent with the requirements of the Habitat Regulations 2017 or national policy to protect and enhance areas of biodiversity (such as Epping Forest) and is thereby not justified. The general pattern of District housing allocations is to be concentrated around Epping Forest with around 6,000 houses projected to be provided within less than 5km (see Habitats Regulation Assessment (HRA) Dec 2017 Document EB206) of Epping Forest land (including the SSSI area) and within less than 6.2km of Epping Forest SAC boundaries (6.2km has been established as the *Zone of Influence* for 75% of visits by a recent Visitor Survey by Footprint Ecology on behalf of the Council and other authorities, including the Conservators). We do not consider that the Plan has shown that this level of increase is sustainable in terms of road infrastructure. For example, the general pattern clearly has implications for the highways infrastructure required to serve it, as revealed by the Highways Assessment (HA) list (Document EB502, Table 3-8) of “Essential” highway junction improvements along roads in or leading through the Forest SAC (also listed in the Infrastructure Development Plan (IDP) Part B (Document EB1101B Section 8.3) as DW6, EPP15 and WAB5).

4.1.2 Where a local plan is reliant upon particular projects to secure delivery of some or all of the local plan, any such projects must be assessed as part of the plan level **Habitats Regulation Assessment** (HRA). Whilst the full detail of a project may not be available, the HRA must gather as much information as it can in order to have certainty, at the plan level, that the quantum and locations of development proposed in the plan can be delivered without adverse effects on European sites.

4.1.3 It seems apparent that the **Wake Arms Roundabout** and **M25 Junction 26** improvements are a fundamental part of the delivery of growth in the plan, due to the level and locations for development proposed. The plan level HRA must therefore demonstrate certainty that the Wake Arms roundabout and M25 J26 projects can be delivered without adverse effects on Epping Forest SAC. The impacts of increased traffic on both these junctions have been considered before in relation to the London Borough of Enfield proposed Northern Gateway Access Road (NGAR). The NGAR proposal would have increased flows by 5.9% (a.m. hours) and 4.1% (p.m. hours) on the A121 Woodriven Hill to Wake Arms Roundabout, less than the percentage increase in traffic from the



current Plan housing proposals over the Plan period (2011 – 2033). In the NGAR public inquiry Inspector's Report (Enfield NGAR Inquiry Report July 2002 (APP/V4630/V/01/1075981) the Inspector was concerned then that traffic models and analysis underestimated actual traffic flows and the effects of congestion. In 2015, another Inspector's report (PINS/Q5300/429/9), which considered the impact on the Forest of this same proposed route as part of the North-East Enfield Area Action Plan (NEEAP), concluded that it was still unclear how the concerns identified by the previous inquiry had been overcome.

It is imperative that this Plan's proposals are subject to more rigorous analysis. This demonstration must follow step-by-step processes and if adverse effects cannot be ruled out then this has implications in terms of the legislation. If there are risks that the project could damage the SAC the Local Plan would not be sound.

4.1.4 Secondly, in **SP2A**, under the Plan proposals, established and well-used open spaces in settlements close to Epping Forest would be lost, in whole or in part, to built development. The Policy at SP2A then refers to "adequate open space provision", which is unspecific and does not set the level of quality, accessibility or type of open space and does not preclude a reduction in the current area available. This runs counter to the need for provision of increased open space to accommodate a variety of needs (informal/sport) for increased housing. Such an approach is likely to increase the recreational pressure on Epping Forest (including the SAC) when avoidance should be the first consideration (see our response to DM2) in the hierarchy of mitigation for the protected site.

4.1.5. **Short-term mitigation issues:** Elsewhere in this document we examine long-term mitigation through proposals for a Mitigation Strategy. However, SP2 proposals also present a number of issues that will create significant short-term problems for the Forest, particularly relating to traffic. For example, the closure of station car parks at Epping and Loughton for the re-development of these sites, seems likely to cause considerable disruption to traffic flows over a period of many months. It is unclear to The Conservators how these issues will be tackled with regard to protection of the Forest from increased traffic flows and a concomitant increase in localised air pollution.

4.2 Policy SP2 - Suggested changes

4.2.1 Please see our comments on and suggested changes to Policies DM2, DM22, P1, P2, P3, P6 and comments on the Habitats Regulations Assessment (HRA - Document EB206).

5. Policy SP3

5.1 Policy SP3 - Representation on Issues

5.1.1 The Conservators welcome the place-shaping principles embodied in Policy SP3A and, in particular, SP3A sub-policies (vi), (vii), (viii) and (xii).

6. Policy SP7

6.1 Policy SP7 - Representation on Issues

6.1.1. The Conservators welcome the aim of Policy SP7 to provide a comprehensive green and blue infrastructure across the District. We welcome the sub-policy SP7E insofar as this will be used to

ensure that green infrastructure in developments like the garden communities (e.g. Latton Priory sub-policy SP5.1) will not be isolated and unconnected with other important green infrastructure. We also agree with the precautionary note within the HRA (Document EB206) about ensuring connectedness does not bring extra recreational pressures onto protected sites inadvertently.

6.2 Policy SP7 - Suggested changes

6.2.1 The Conservators propose that Cobbin's Brook's protection as a Local Wildlife Site is enlarged to take in the Flood Risk zoning in its entirety. It is further suggested that the valley is linked to The Lower Forest and that the Epping Forest Buffer Lands are strengthened through proposals in a Green Infrastructure Plan document.

6.2.2 We would also propose further protection of links towards The Lower Forest and the Epping Forest green lanes both southwards towards the Buffer Lands and eastwards to ensure that Epping Forest is enhanced as the Plan Vision A (v) seeks to do (page 19 of Submission Plan).

7. Policy DM1 (and Policies Map)

7.1 DM1 - Representation on Issues

7.1.1. This is in general a very positive policy for biodiversity and picks up current policy and good practice in relation to demonstrating biodiversity net gain, preventing loss of irreplaceable habitats, recognition of LPA duties for priority habitats and species and requiring adherence to BS 42020.

7.1.2. However, this Policy is seen through the lens of development impact and seems reactive only, especially without a complementary Green Infrastructure (GI) Plan (see our comments on Policies SP7 and DM5 also). The Conservators consider that the Policy would benefit from explicit recognition of the need to proactively prevent the isolation of important ecosystems. This applies particularly to Sites of Special Scientific Interest, such as The Lower Forest within Epping Forest SSSI and Hainault Forest SSSI. These designated sites must be supported by and linked to a wider biodiversity network across the District and beyond. This should be clearly designated as green infrastructure.

7.1.3. Narrowing of Forest Protection

Furthermore, DM1 and DM2 (see below) do not fully replace the previous Epping Forest District Council Local Plan Policy HC5, which recognised the need to protect the whole of Epping Forest as an historic landscape of high biodiversity. This included the areas of the Forest such as the ancient green lanes and The Lower Forest. The Reg 19 Submission Plan seems to narrow the protection for the Forest and takes a noticeably less holistic approach to this irreplaceable District asset.

7.2 DM1 - Suggested changes

7.2.1. The recognition and protection for the whole of Epping Forest Land under the Epping Forest Act 1878 should be explicitly stated within this Policy to reinforce Local Plan Objective A (ii). In addition, the Plan should take this opportunity to recognise the importance of the covenanted land (protected by the Arbitrator's Awards of 1882 following his appointment under the Epping Forest Act 1878) as well as the Buffer Lands around the Forest in Plan Policy.

7.2.2. For The Lower Forest a protected GI corridor around the west of Epping, to both the Conservation Areas and Epping Forest Buffer Lands and to the main body of Epping Forest, is important. GI links to The Lower Forest's south-east through to the important floodplain of the River Roding should also be designated to ensure enhancement and strengthening beyond the demarcating of Local Wildlife Sites. This should be set out in a Green Infrastructure Plan.

The Conservators of Epping Forest

*Representations on the Regulation 19 Submission Version of EFDC Local Plan
(January 2018)*

Page 5 of 25

7.2.3. In this context of integrating ecosystems and keystone green infrastructure, The Conservators welcome the recognition of the Cobbin's Brook valley as a Local Wildlife Site, which the City's Buffer Lands help to protect. This corridor should be protected and broadened as green infrastructure in line with the flood zones and become a foundation for linking sites and integrating ecosystems, including that of The Lower Forest. This should be set out in a Green Infrastructure Plan.

8. Policy DM2

8.1 Policy DM2- Representation on Issues

8.1.1. Main concerns

8.1.1.1. Policy DM 2 follows the general biodiversity policy DM1 (see our comments above). Policy DM2 specifically relates to Epping Forest SAC and the Lee Valley SPA. Where there are significant issues or the need for strategic approaches for European sites, it is common practice for a specific policy to be included within a local plan in addition to the more general protective biodiversity policies. The inclusion of DM2 is therefore in principle welcomed. Such policies should recognise the specific issues relating to the particular sites and set out the measures necessary to provide the required protection. This can often refer to gathered evidence to underpin a particular approach to European site protection, and where in progress or in place, any specific strategies to provide an area wide mitigation scheme.

8.1.1.2. Policy DM2 as currently worded does not provide sufficient clarity on the specific risks and the requirements from developers are not clear. The wording is currently not fit for purpose as it does not ensure adequate protection for Epping Forest SAC. Current work between neighbouring authorities, Natural England and ourselves has identified risks to Epping Forest that necessitate a strategic level approach to the long-term conservation of the SAC. With over 50,000 dwellings proposed for the HMA of which 11,400 are within the EFDC Local Plan, there are very real risks for the SAC resulting from the two main impact pathways under consideration; air quality and recreation.

8.1.1.3. The policy and its supporting text needs to be reworded to appropriately reflect the current work to gather evidence on these two matters and the strategic solutions necessary to protect Epping Forest. The policy needs to give certainty that the SAC will be protected as development proposals come forward, and this requires clear guidance to developers on what is expected, where development may be constrained, what mitigation is necessary and how that mitigation will be secured and delivered. Without such wording, adverse effects on integrity to the SAC cannot be ruled out. As such the local plan is currently not compliant with the requirements of the Habitats Regulations and is therefore unsound.

8.1.1.4. The following advice highlights the key areas of concern within Policy DM2, and how those concerns could possibly be alleviated.

8.1.2. Concerns on Supporting Text

8.1.2.1. Biodiversity policies should set out how the authority intends to secure the conservation, restoration and enhancement of biodiversity assets as a mutually dependent part of sustainable development alongside economic growth and supporting community needs. For the specific policy

wording about the European sites, the policy should commit to securing the conservation of the European sites with recognition of the value of such sites as the most valuable biodiversity sites within a wider network of biodiversity assets. The policy should recognise the opportunity for EFDC to restore and enhance Epping Forest as an integral part of delivering the local plan. The supporting text for policy DM2 runs from paragraph 4.16 to 4.26. The wording does, in places, give a positive focus on the role and value of these sites, but the focus on essentially leaving all considerations to the individual project level does not fulfil plan level requirements to meet the duties places on local planning authorities within the Habitats Regulations and parent European Directives.

8.2 Policy DM2 - Suggested changes

8.2.1. Changes to DM2 Supporting Text

We identify the following specific concerns, and recommendations for how the supporting text may be strengthened:

Para of DM2 supporting text	Concerns	Recommendations
4.16	Incorrectly applies the Habitats Regulations, is confusing and implies that protection comes from detailed project level assessment. This paragraph needs rewording.	Reword to refer to - European sites are afforded the highest level of protection due to their habitats and species that are vulnerable or rare within a European context. The Council has a duty to secure the maintenance and restoration of these sites as part of its work as a public body. Additionally, where development plans or projects are likely to have a significant effect on European sites, the Council must assess the implications of such effects, and secure any mitigation necessary to prevent an adverse effect on site integrity.
4.17	Does not adequately explain a strategic, plan level approach to mitigation. Clarity needed for developers.	Reword to refer to – The Council’s duties to maintain and restore European sites, and protect them from any potential affects arising from new development, is best achieved by putting measures in place at the plan level, so that development projects have clarity on where they can develop and what measures may be necessary to incorporate into a development proposal. Strategic approaches to European site mitigation often include for example, access management, provision of alternative recreation space and sustainable transport choices to reduce air pollution.



4.18	The paragraph correctly acknowledges the issues of air quality and recreation. Concerns relate to the role of buffers.	Suggest rewording the sentence on the role of buffers to say that these <i>may help</i> to relieve recreational pressure. This is currently a presumption and needs to be factored in to a strategic approach.
4.19	Positive reference to Council role and responsibility but a focus on project level HRA though.	Reword to add in –The Council has taken steps to work with partners to develop a plan level approach to securing the protection of European sites.
4.20	<p>Paragraph is confusing as it does not clearly stipulate the HRA findings of likely significant effects from recreation, for Epping Forest SAC. It is essential that the Plan secures the necessary mitigation in order to provide confidence that adverse effects on the integrity of the SAC can be avoided. At the moment, this is not secured.</p> <p>Reference to the MoU as a stewardship role is misleading and does not convey the fundamental importance of it for mitigating the effects of development. This reference needs removing and clarity given on the fundamental importance of the MoU.</p>	<p>Reword paragraph to give clearer summary of HRA findings. Suggest rewording to include –</p> <p>The HRA of the local plan concluded that management regimes in place enable Lee Valley SPA/Ramsar site to be screened out from likely significant effects arising from recreation pressure as a result of the local plan. The HRA concluded that likely significant effects from recreation pressure could not be screened out for Epping Forest SAC. Plan level measures to prevent adverse effects on the integrity of the SAC are therefore required.</p> <p>In terms of air quality, the HRA screened out both the Lee Valley SPA/Ramsar site and Epping Forest SAC from likely significant effects. This conclusion relies on the Memorandum of Understanding between the Essex/East Hertfordshire HMA authorities, Natural England and the City of London as Conservators of Epping Forest, which must be implemented as part of the local plan in order to resolve air pollution issues at Epping Forest.</p>
4.21	Again, as above the misleading stewardship role reference for the MoU needs removing. The MoU is in recognition of the risk of deteriorating air quality as a result of development. It is not stewardship.	<p>Change stewardship role to follow on from suggested paragraph wording above –</p> <p>In recognition of the requirement to prevent air quality deterioration at Epping Forest as a result of traffic increases, the MoU signed by the Essex/East Hertfordshire HMA authorities, Natural England and the City of London as Conservators of Epping Forest ensures that the parties named work in partnership to fulfil....</p>
4.22	No comments	No comments
4.23	The second half of the paragraph relating to Epping Forest suggests that DM2 provides “the mechanisms for managing future recreational pressures on the Forest.” The current wording	<p>Reword last two sentences to –</p> <p>The Council’s approach is to put in place a mitigation strategy that combines a range of access management measures with the provision of green infrastructure to</p>



	<p>does not fulfil this, but recommended changes below would enable this sentence to be correct. Reference to the approach that is “to facilitate the development of a green infrastructure network” does not cover all mitigation measures that should be put in place.</p> <p>Paragraph should be updated in light of recent visitor survey findings too.</p>	<p>encourage recreation at suitable alternative sites. This is being initially detailed within an interim framework, to explain how developers within a 6.2km zone of influence need to adhere to the strategy with tariff based contributions, followed by a European site conservation supplementary planning document. The strategy will have an evidence based suite of costed mitigation and monitoring measures, and set out delivery, governance and review processes.</p>
4.24	<p>Does not make clear that the provision of greenspace is one aspect of a mitigation strategy. Needs an introductory sentence to explain this before describing the green infrastructure provision.</p>	<p>Reword to the start of the paragraph–</p> <p>In pursuit of protecting the vulnerable habitats of Epping Forest, the interim framework, and then subsequent SPD will include a range of measures. One aspect of the strategy will be to provide alternative spaces.....</p>
4.25	<p>Para 4.25 then goes on to indicate that “small scale housing will contribute to support the development and implementation of an access management strategy by the City of London Corporation”.</p>	<p>Reword to –</p> <p>The interim framework and subsequent SPD will set out the contributions being sought by the Council. All development with a net increase of one or more residential units within the 6.2km zone of influence will be required to make a tariff based contribution.</p> <p>It is suggested that a simple map illustrating the zone may be beneficial here within the local plan.</p>
4.26	<p>Does not logically follow paragraph 4.25</p>	<p>Recommend adding this one sentence paragraph to the end of paragraph 4.24.</p>



Policy DM2 – Suggested Changes continued

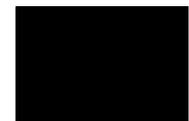
8.2.2. Changes to DM2 Policy Wording

8.2.2.1. The policy wording in DM 2 is not sufficient to secure such mitigation and we identify the following specific concerns, and recommendations for how the policy may be strengthened.

Section of policy DM2	Concerns	Recommendations
A	This sentence is confined to the SPA and SAC. These sites are particularly reliant upon wider functionally linked land and ecological corridor linkages.	Reword to refer to - development proposals contributing to the conservation and enhancement of the biodiversity, character, appearance and landscape setting of Epping Forest and the Lee Valley, with particular regard for the legislative requirements in relation to the European site designations afforded to these areas.
B	This part of the policy simply deflects issues to project level HRA. Given the issues relate to the in-combination, cumulative effects of the overall quantum of development, such project level assessment is difficult and mitigation measures, particularly for small sites, very difficult to secure. It is not clear whether such project level assessment will be required for development in the settlements identified in DM2C, where contributions are required.	Reword to refer to – the Council is working in partnership with other relevant organisations to put in place strategic approaches to protecting the European sites, in recognition of the cumulative impacts of recreation and air pollution from development. New development will be required to adhere to strategic approaches where applicable, as detailed below. Outside this requirement, where any project specific likely significant effects are identified, either alone or in-combination with other plans or projects, will be required to demonstrate that adequate measures are in place to avoid or mitigate for any potential adverse effects.
C	Here the policy identifies settlements where contributions will be required. This list needs to be updated with the more recent visitor survey results. The visitor survey results will not however identify how the money will be collected, how the tariff is set, governance or any other details. There needs to be a clear, strong policy steer and direct cross-reference to a strategy, which we suggest should be established as an SPD. DM2C does not provide sufficient clarity, weight or guidance to ensure mitigation will be delivered and will be fit for purpose.	Reword to refer to – In recognition of additional recreation pressure from residential development on Epping Forest SAC, the Council will require proposals for any net increase in residential units within 6.2km to make a financial contribution to a strategic approach to mitigate the cumulative effects through access management and monitoring. An interim framework with tariff based developer contributions will be developed into a European site conservation supplementary planning document, with an evidence based suite of costed mitigation and monitoring measures, delivery, governance and review processes.



D	<p>Sets up greenspace provision as mitigation, but fails to specify a quantum of greenspace, how greenspace will be secured, funded or delivered, for example managed in perpetuity. While greenspace provision is a positive step, which recent survey work indicates is likely to work as mitigation and will bring wider benefits, DM2 D is not sufficient or clear to provide necessary mitigation for Epping Forest SAC. It is not a given that there is sufficient greenspace that could be improved or provided as new sites. As with DM2C this could be greatly strengthened by directly cross-referencing to a strategy document, secured as an SPD, that sets out what greenspace is necessary as mitigation for Epping Forest SAC and how such greenspace works alongside the contributions to the management of Epping Forest as a mitigation package.</p>	<p>Reword to refer to – The Council’s strategic approach protecting Epping Forest SAC and Lee Valley SPA recognises the need for natural greenspaces to support the function of the sites or provide Suitable Alternative Natural Greenspace for people to undertake recreation away from the sites. In accordance with the interim framework, to be followed by a European site conservation supplementary planning document, the Council will require development to contribute towards or provide the following: then insert points I to iv. The interim framework/SPD should stipulate where large scale development has additional SANG requirements over and above a contribution to the strategy.</p>
E	<p>Appears to overlap with DM2B in deferring assessment to the project level. It is confusing to bring in a 400m buffer here. The impacts from urbanisation, as with impacts from recreation, extend over a wide area. The 400m zone is identified and suggested in the HRA, drawn from the Thames Basin Heaths (see para 3.21 in the HRA). The buffer has been lifted from the Thames Basin Heaths (where it relates to urban effects that include cat predation and recreation) without justification or clarity. In the Thames Basin Heaths the buffer sets out an area where there is a presumption against development within 400m of the European site boundary, as Natural England advice is that mitigation is unlikely to be effective so close to the European site boundary. EFDC’s Plan includes a number of allocations within 400m. It is not clear what mitigation is possible to resolve urban effects for these sites. The Plan therefore seems to be reliant on a number of sites for which project level HRA is likely to be difficult and potentially may not be able to rule out our adverse effects on integrity.</p>	<p>An evidence based buffer that is appropriate for Epping Forest should be established. This may be 400m, but currently the 400m inclusion is simply lifted from elsewhere. Appropriate policy wording should be included after consideration of the suitability of 400m.</p> <p>Reword to refer to - The Council recognises that residential development within 400m (or other distance) of Epping Forest SAC is unlikely to be able to demonstrate effective mitigation measures to prevent adverse effects on the SAC. Planning applications within 400m (or other distance) of Epping Forest SAC will not be permitted unless robust mitigation measures are demonstrated.</p>



8.2.3 Policy DM2 - Further representations on other issues

8.2.3.1. Further representations on Policy DM2 issues no.1

Policy DM2 Representations on - *A meaningful proportion of Natural Greenspace*

Policy DM2D sets up greenspace as mitigation; stating that the Council will ensure the provision of a meaningful proportion of Natural Greenspace or access to Natural Greenspace. This is ambiguous as there is no clarity on what a meaningful proportion of greenspace might be and is unlikely to be effective. In order to function effectively, alternative greenspace sites need to be of a suitable size, design and location to draw access. It cannot be assumed that there is adequate greenspace in suitable locations or that this can be delivered. There is the risk that the mitigation as stated cannot be delivered.

8.2.3.2. Policy DM2 Suggested changes - *A meaningful proportion of Natural Greenspace*

The interim framework/SPD, therefore, should set out how much greenspace is required and demonstrate that such greenspace is deliverable.

8.2.3.3 Further representations on Policy DM2 issues no.2

Policy DM2 Representations on – *a Zone of influence*

The most recent visitor survey work by *Footprint Ecology*, undertaken in October/November 2017 was commissioned jointly by five local authorities (including EFDC) and the Conservators of Epping Forest (City of London Corporation) and one of the aims was to better understand where people who visit Epping Forest live. Draft results from that survey became available from 25th January 2018. Data from that survey showed 75% of visitors had home postcodes within 6.2km of the point where interviewed. The use of the 75th percentile to define a broad zone of influence has been widely used at other European sites, such as the Thames Basin Heaths, the Dorset Heaths and the Solent, and is recommended by Natural England for Epping Forest (see para 5.19 of the HRA (Document EB206)).

8.2.3.4. Policy DM2 Suggested changes – *Zone of Influence*

In line with the HRA recommendations (Document EB206, para 5.24) the survey results should be used to update the *zone of influence* and this should be 6.2km. This now sets a distance at which likely significant effects from recreation would be triggered in the absence of mitigation. This zone should now be clearly referred to and mapped within the Plan on an updated **Policies Map**.

8.2.3.5. Further representations on Policy DM2 issues no.3

Policy DM2 Representations on - *the need to secure adequate strategic approach*

The impacts of recreation relate to increased recreation pressure from development over a wide area. It is very difficult to adequately assess impacts for small developments at a project level and ensure suitable mitigation is in place. The Local Plan provides the mechanism whereby mitigation for multiple developments over a wide area can be established and done so in a positive way that removes the burdens for developers and ensures adequate protection for the SAC. Such approaches are working well around European sites such as the Thames Basin Heaths, the Dorset Heaths, south-east Devon, the Solent and Cannock Chase, each involving multiple local authorities.

8.2.3.6. The Conservators of Epping Forest would fully support such an approach and indeed have signed up to the MoU as one of the parties fundamental to the development of a strategy. The Conservators see such an approach as the only way to ensure the long-term protection of Epping Forest SAC and the Forest more generally. The MoU represents the tentative initial steps towards the development of a strategy, however such a strategy is a long way from being established. Much more work is necessary to develop the strategy and to date little has been achieved beyond the visitor survey. The lack of clear policy or reference to a strategy in DM2 means that there is not

possible to have confidence that mitigation is achievable, deliverable or adequate to resolve the impacts.

8.2.3.7. Policy DM2 Suggested changes – *the need to secure adequate strategic approach*

DM2 Policy should explicitly cross-refer to a Mitigation Strategy. In the interim, a framework, with tariff-based developer contributions, which leads on to form a European site conservation supplementary planning document (SPD), with an evidence-based suite of costed mitigation and monitoring measures, delivery, governance and review processes should be established. **The Conservators would be happy to work with the Council to produce such a framework.**

-----oo00oo-----

9. Policy DM4 Green Belt

9.1 Policy DM4 - Representation on Issues

9.1.1. The Conservators reiterate their concerns, expressed in response to the Regulation 18 Local Plan, about the erosion of Green Belt. We welcome the removal of the housing proposal, which would have extended Theydon Bois to the east of the railway and created a vulnerable new boundary within the Green Belt. However, we do not consider the Epping South proposed developments (EPP.R1 & EPP.R2), nor their increased density in the Green Belt, to be justified (see our response above to Policy SP2 and below to Policy P1).

9.1.2. Specifically, with DM4 (v) and (vi) we consider that the Policy is unsound because it does not afford enough protection for Epping Forest and would act to undermine Policies DM1, DM2 and DM5. Sub-sections of Policy DM4, (v) and (vi), are insufficiently circumscribed and the word “limited” is not specific enough, particularly in the absence of named exceptions. In our response to Reg 18, we stated clearly that we did not consider that the status of the Green Belt at High Beach and Gilwell Hill, both very close to the Forest boundaries, had been respected and protected. We re-attach the map that we provided in our previous response to the Council (see attached documents) to illustrate the fact that GB has been eroded and the hamlet most closely associated with Epping Forest has been allowed to grow and coalesce, reducing the open character of the place.

9.1.3. These lapses in safeguarding the open nature of the countryside must not be compounded by further erosion of the GB. DM4 (v) and (vi) allow for infilling and also the redevelopment of previously developed land. These two actions could allow the transformation of High Beach from a small hamlet to a much larger settlement with major implications for the road network through the Forest. The recent decision to close the Police helicopter support unit at High Beach creates a potential threat to the openness of the GB here and to the protection of the Forest. Similarly, the housing along Sewardstone Road could also be allowed to infill creating unsustainable ribbon development along an increasingly congested highways corridor, with significant knock-on impacts for the smaller roads through the Forest (see also paragraphs 11.2.2 and 12.1.4 of this document).

9.2 Policy DM4 - Suggested changes

9.2.1. These areas of Green Belt at High Beach and along the Sewardstone Road need to be strengthened by specific exclusion from DM4 (v) and (vi). In addition, they should be demarcated on the Policies Map for their positive role in providing linking and protective green Infrastructure for the Forest and towards the Lea Valley. We have made separate comments about the need for a clear Green Infrastructure Plan to provide clarity and substance to the aspirations of Policies DM5 and SP7 on Green Infrastructure.



10. Policy DM5

10.1 Policy DM5 - Representation on Issues

10.1.1. The Conservators regard this as a positive and strong policy in most respects. The supporting text in paras 4.38 to 4.43 is comprehensive and the emphasis on biosecurity, native planting and the importance of trees in the landscape is warmly welcomed.

10.1.2. However, we consider that these laudable aspirations need to be backed up by a clearly mapped green infrastructure on the Policies Map and a Green Infrastructure Plan as a supplementary document to the Local Plan. We would suggest, in addition, that this policy should make explicit reference to the need for greenspace provision to be part of the recreation mitigation for Epping Forest SAC.

10.2 Policy DM5 - Suggested changes

10.2.1. Within Policy DM5 reference should be added to the requirement to provide greenspace as part of the interim framework and subsequent SPD to mitigate for increased recreation pressure at Epping Forest as a result of new housing growth. It is suggested that the sentence at point DM5(iii) could be expanded to state 'incorporate provision of new green assets or space, including specific provision for European site mitigation in accordance with the strategic approach outlined at policy DM2'.

10.2.2. The key new connections and elements which would make a viable green infrastructure for the District need to be identified on the Policies Map and in a Green Infrastructure Plan that goes beyond the bounds of the Garden Communities and matches the Infrastructure Development Plan. There should be a clear commitment to develop such a Plan in this Policy and in Policy SP7.



11. Policy DM22

11.1 Policy DM22 - Representation on Issues

11.1.1. This policy is referred to within **DM2** as the policy delivering the air quality mitigation to protect Epping Forest SAC. Whilst the supporting text for policy DM22 gives appropriate coverage of this, the policy wording itself is weak and does not clearly give the commitment to mitigation delivery through an agreed Mitigation Strategy.

11.1.2. Furthermore, the implications of mitigation for air quality are not elaborated in either the supporting text in **para 4.161** or in the Policy itself (see **DM22B**). However, as seems clear from the HRA (see para 6.12), Scenario 5 and above in the Highways Assessment (HA - Document EB502) and the Infrastructure Development Plan (IDP – Documents 1101A & B) delivery schedule of schemes, mitigation would involve increasing the capacities and changing the geometries of roundabouts and highways junctions within the Forest. Some of these are considered “essential” by the IDP in order to deliver the increase in housing at the proposed locations (see SP2 and Policies P1 -15) and yet the HRA is unable to assess the impacts of these on the Forest SAC and the Plan itself does not offer an explanation of how Epping Forest as a whole would be protected and enhanced by these schemes.

11.1.3. It seems apparent that the **Wake Arms Roundabout** improvements are a fundamental part of the delivery of growth in the plan, due to the level and locations for development proposed. The plan level HRA must therefore demonstrate certainty that the Wake Arms roundabout project can be delivered without adverse effects. This demonstration must follow step-by-step processes and if adverse effects cannot be ruled out then this has implications in terms of the legislation. If there are risks that the project could damage the SAC the Local Plan would not be sound.

11.2 Policy DM22 - suggested changes

11.2.1. The policy needs to clearly state that the Memorandum of Understanding (MoU) between the Essex/East Hertfordshire HMA authorities, Natural England and the City of London as Conservators of Epping Forest is committed to and being implemented through a **Mitigation Strategy** as part of the local plan in order to resolve air pollution issues at Epping Forest.

11.2.2. DM22 also needs to make clear that mitigation measures would not compromise the physical integrity of Epping Forest (see our comments on Policies SP2 and DM2).

11.2.3. The HRA does not provide a sufficient assessment of the impacts of the Plan on air quality and further monitoring and modelling is required. A full Appropriate Assessment under the Habitats Regulations 2017 needs to be carried out before the Plan and this Policy DM22 can be considered sound.

(Please see our detailed comments below on the HRA Document EB206)



12. Policy SP5 Garden Communities

11.1 Policy SP5 - Representation on Issues

11.1.1. The proposed **Latton Priory** development (**SP5.1**) of 1,050 houses lies within 6.2km of Epping Forest SAC and within 3km of Epping Forest SSSI boundaries. This development is a large potential contributor of the traffic through the Forest and needs to be considered at Plan-level in the Forest Mitigation Strategy.

11.1.2. This was considered by the HRA to be outside the 75% Zone of Influence (Zoi) but the recent draft Visitor Survey (available since 25th January 2018) has shown that this needs to be extended to 6.2km. As such the HRA needs to consider the impacts of this site in terms of its likely recreational impact as well as the impact on roads through the Forest.

11.1.3. The HRA (Document EB206) considered that a Garden Communities site like this would have sufficient greenspace or 'strategic green infrastructure' (HRA para 5.19 (fifth bullet point)). The green infrastructure requirements are welcomed (see **Policy SP5F (iv)**) but they should be more detailed and part of a Plan-level Mitigation Strategy. The green infrastructure should ensure that the 'Gibberd Saucer' is protected and not breached.

11.2 Policy SP5 - Suggested changes

11.2.1. The impacts of this development need to be considered at Plan level through a Mitigation Strategy for Epping Forest, in particular the impacts of traffic on the B1393 and through the Forest to Wake Arms Roundabout need to be assessed.

11.2.2. The Rye Hill Road southwards to the B1393 should be closed and considered "essential". In the IDP Part B (Document 1101B) a Rye Hill Road diversion is listed as "desirable" only. Furthermore, should this development be progressed the proposed north-south sustainable transport corridor should be established and in full operation prior to any 'safeguarded route' (see Policies Map) to the M11 Junction 7 being constructed. The uptake of sustainable transport may well experience a lag time and provision of an alternative highway option to the motorway could reduce the level of uptake significantly. In addition, any such 'safeguarded route' should not allow a right turn at the intersection with the B1393 so that traffic cannot head directly southbound towards the Forest. Instead the traffic would be directed to the M11 Junction 7 roundabout bypass that is proposed as a "desirable" under the code **LPR3** in the Infrastructure Development Plan (**IDP - Document EB1101B**).

11.2.3. More information on the strategic green infrastructure needs to be provided, including design and location, to determine whether it would be effective. This Policy could be strengthened by directly cross-referencing to a Mitigation Strategy document, secured as an SPD, that sets out what greenspace is necessary as mitigation for Epping Forest SAC and the size of the allocation for greenspace to absorb and sustain the recreational pressure at Latton Priory.

12. Policy P1 - Epping

12.1 Policy P1 - Representation on Issues

12.1.1. The Conservators welcome the fact that the proposed expansion of Epping eastwards contained in the Regulation 18 Plan consultation has been withdrawn as this would have created a long convoluted boundary, which may have made the remaining Green Belt (GB) boundary around Epping vulnerable to further erosion (see our comments in our response to the Reg 18 Plan – Dec 2016).



12.1.2. However, of real concern to the Conservators are the Epping South proposed developments (EPP.R1 & EPP.R2) in the GB, with the proposed increased density and doubling of housing numbers to a minimum of 950. We do not consider these to be justified because of the likely adverse effects on traffic congestion and air pollution at road junctions close to or adjacent to Forest Land. The doubling of the housing numbers would seem to call into question the availability of sufficient green space at these sites for them to “consume their own smoke”. These two developments are likely to have significant adverse impacts through the increased recreational pressure on the Forest, including the SAC, and also on the nearby Forest Buffer Lands at Great Gregories.

12.1.3. The general adverse impacts on the highways infrastructure, air quality and on recreational pressures on the SAC have been dealt with elsewhere in our responses to Policies SP2, DM2, DM22 and to the Habitats Regulations Assessment (Document EB206). Our specific concerns with this Policy P1 relate to the access to the highway and the impact on nearby highway junctions and parking. The access required for the proposed western section of Epping South seems likely to have a direct physical impact on Forest Land owned by The Conservators and protected under the Epping Forest Act 1878. The Conservators have not been consulted about this.

12.1.4. In addition, the Highways Assessment (Document EB502) and Infrastructure Development Plan (IDP - Documents 1101A and B) suggest that the significant increase in traffic would require alterations to the small Ivy Chimneys junction (IDP – EPP28) and the traffic-lighted Bell Common/Theydon Road Junction (Junction 10 in the HA and EPP14 in the IDP). At Bell Common the IDP also proposes as “desirable” that the Bell Common junction (EPP23) is provided with an additional lane. An additional lane would require land-take almost certainly from Epping Forest Land, protected under the Epping Forest Act 1878. This is in contradiction to the Plan Objectives (page 20 of the Reg 19 Submission Plan).

12.1.5. In addition, due to the junction capacity problems, the traffic from these developments is likely to ‘rat-run’ to the Wake Arms Roundabout along Theydon Road and Piercing Hill to Theydon Bois and then through the Forest. These key issues outline above call into question the deliverability of this housing as well as the sustainability of its greenspace and the Plan Policy P1 would not seem to be effective or sound.

12.1.6. In addition to these potential adverse impacts, this Epping South development is likely to have an adverse impact on the Conservators’ Buffer Land at Great Gregories. This site is the out-wintering site for the Conservators’ breeding herd of cattle and the hub for organising the grazing operation that ensures the Forest’s wood-pasture habitats can be grazed and maintained in favourable condition (as defined by Natural England for Epping Forest Site of Special Scientific Interest (SSSI)).

12.1.7. Currently, a well-used public footpath runs through the centre of the site between hedges, also passing close to the yard where the cattle calve and are fed during the winter. There had been incidents of trespass into the fields, which are important protected sites for the young calves and which are also a checking area for the cattle before they go out onto the Forest. The yard has also been subject to trespass on occasion. With the current numbers of people using the public footpath the problems with unauthorised access have been reduced to a manageable level.

12.1.8. However, should such a large residential area be developed, without any nearby alternative greenspace, the footpath would be the only access to countryside for the residents. This seems likely to overwhelm the Great Gregories site which is within a few hundred metres of the development and incidents between dogs and cattle, particularly calves, could put the security of this cattle management area in jeopardy. Should the number of dogs off-lead increase significantly, *Neospora*,



an infection spread through dog faeces causing abortions in cows and already a problem in the area around the Forest, would also become a considerable threat to the health of the breeding herd.

12.2 Policy P1 - Suggested changes

12.2.1. The Epping South development should be re-considered, particularly the western site which has the potential to cause direct adverse impacts on Epping Forest Buffer Lands as well as damage to the Green Belt. This development needs to be considered as part of the broader issue of traffic that is being generated through Epping Forest roads, as highlighted in our comments on Policies SP2, DM2, DM22 and our comments on the HRA (Document EB206). The impacts of this development need to be considered at Plan level through a Mitigation Strategy for Epping Forest.

12.2.2. Should the master-planning for these areas be taken further the natural greenspace requirements would need to ensure that they could “consume their own smoke” and provide for recreational pursuits (such as dog-walking) that would ensure no additional pressure on Epping Forest or its Buffer Lands at Great Gregories. The issue of pressure on the public footpath that access directly onto Great Gregories would need to be directly and effectively addressed by any master-plan.

13. Policy P2- Loughton

13.1 Policy P2 - Representation on Issues

13.1.1. The loss of amenity greenspaces in Loughton (Jessel Green and Borders Lane) are of particular concern to the Conservators, as already stated in our response to the Regulation 18 Plan consultation (December 2016). These proposals run in direct contradiction to other Plan policies on green infrastructure (**DM5 and SP7**), reducing the greenspace available to the residents at the same time as increasing the density of the residential population. As such this policy would seem to be unsound.

13.1.2. This policy would have the effect of eliminating at least half of a large, well-established and important historic recreational area at Jessel Green (**LOU.R5**) and would displace recreational pressure onto the Forest (see also our comments above on Policy SP2A). There seems to be no clear strategy to increase the alternative green space in Loughton but rather to make contributions to Epping Forest access management. This suggests that the mitigation hierarchy process of avoiding damage to Epping Forest before considering mitigation options has not been followed here.

13.1.3. In addition to this direct impact on the Forest, the loss of an historic area of green space associated with the idea of “green wedges”, later created in nearby Harlow, seems to send the wrong signal about the Local Plan objectives.

13.2 Policy P2 - Suggested changes

13.2.1. The impacts of these developments need to be considered at Plan level through a Mitigation Strategy for Epping Forest (see our comments above on DM2 and below on the HRA).

14. Policy P3 - Waltham Abbey

14.1 Policy P3 - Representation on Issues

14.1.1. Development at Waltham Abbey will require the potential need to upgrade/widen the existing Galley Hill Road and Crooked Mile (see **Policy P3N (vii)**), in order to ensure safe access points and sufficient capacity for the proposed new developments at **WAL.R1 (295 houses)**, **WAL.R2**

(315 houses), WAL.R3 (130 houses), WAL.E6 (employment site) and travellers' site (WAL.T1).

Galley Hill Road is an ancient green lane, and its verges are part of Epping Forest, owned by the Conservators and protected by the Epping Forest Act 1878. Access to the sites would require the loss of Forest Land to access tracks or highway land about which there has been no consultation with the Conservators. The deliverability of these proposed developments, therefore, is open to question and the Plan would not seem to be effective in this regard.

14.1.2. In addition, this burden of housing within the 6.2km Zone of Influence around Epping Forest and relying on a narrow highway access and Forest roads is part of the broader concerns on soundness expressed by the Conservators elsewhere in this document, relating particularly to Policies SP2, DM2, DM22 and the Plan's Habitats Regulations Assessment (Document EB206). This development would need to be considered along with 'Place' Policies P1, P2, P6 and Garden Communities Policy SP5 in a Mitigation Strategy for the Forest.

14.1.3 Policy P3 - WAL.E8

The Conservators also reiterate their concern, expressed in their response to the Regulation 18 Plan, that the proposed employment site at Waltham Abbey south of the M25 (WAL.E8) has the potential to add to the problems of congestion at M25 Junction 26 southern roundabout. This could have adverse knock-on impacts along the arm of the A121 that leads through Epping Forest, along which queueing is already a significant issue (see also our comments on the Habitats Regulations Assessment (HRA – Document EB206 below).

14.2 Policy P3 - Suggested changes

14.2.1. The impacts of these developments need to be considered at Plan level through a Mitigation Strategy for Epping Forest.

14.2.2. Although the housing developments here are split into sub-plots of less than 400 homes, and sub-Policy P3K implies that a contribution to Epping Forest access management and monitoring is all that is required, any master-planning, in our view, would need to provide a supply of alternative greenspace to serve the needs of this potential new community (see also our comments on the 400-home threshold under the 'HRA Representation on more specific points' - Chapter 5)

15. Policy P6 – North Weald

15.1 Policy P6 - Representation on Issues

15.1.1. The proposed **North Weald** development of 1,050 houses lies within 6.2km of Epping Forest SAC and within 1.5km of Epping Forest SSSI boundaries. This development is a large potential contributor of the traffic through the Forest and needs to be considered at Plan-level in the Forest Mitigation Strategy.

15.1.2. This was considered by the HRA to be outside the 75% Zone of Influence (Zoi) but the recent draft Visitor Survey (available since 25th January 2018) has shown that this needs to be extended to 6.2km. As such the HRA (Document EB206) needs to consider the impacts of this site in terms of its likely recreational impact as well as the impact on roads through the Forest.

15.1.3. The Conservators are concerned that the Policy P6 only refers in P6F (iii) to highways and junction upgrades. Such a large development so close to Epping Forest needs a clearer plan to ensure that the traffic it generates is not funnelled through Epping Forest along Epping Road. However, it is proposed that the employment site NWB.E4 is to have a western access leading to

Epping Road. Furthermore, there seems to be no plan to ensure that traffic is preferentially directed northwards to the A414 rather than southwards to Epping Forest roads.

15.1.4. The site, which includes the same number of houses as the proposed Latton Priory development (Policy SP5.1), does not seem to be required to provide for its own green space despite being well in excess of 400 homes (see Policy DM2) and within the Zol of Epping Forest SAC. The reference to “adequate public open space” in sub-Policy P6L (v) is insufficient and lacking in the required detail to ensure a green infrastructure.

15.2 Policy P6 - Suggested changes

15.2.1. The impacts of this development need to be considered at Plan level through a Mitigation Strategy for Epping Forest.

15.2.2. A high quality green infrastructure that can cope with the recreational requirements of such a large new residential population needs to be provided for and detailed in the Policy.

15.2.3. The large amount of traffic generated would need to avoid Forest roads and should be directed northwards onto an enhanced A414 junction. Limits to access southwards and the western access from Epping Road to the employment area (NWB.E4) need to be re-considered in order to protect Epping Forest.



16. Habitats Regulations Assessment (Dec 2017)- HRA (Document EB206)

16.1 HRA - Representation on Issues

The Conservators have identified a number of significant concerns with the HRA in relation to Epping Forest SAC. These are listed below and relate to HRA process and the tests that need to be met for Habitats Regulations compliance. This is to a large degree a high-level summary of concerns. Additional concerns are also raised in relation to the Plan Policies, particularly DM2 and DM22.

16.1.1. HRA – Representation on overarching points

STRATEGY & SCALE

- 16.1.1.1. The HRA does not provide a clear, evidence-based and logical progression from screening potential issues through to detailed Appropriate Assessment of all identified risks, and then to applying relevant and evidence-justified mitigation to prevent adverse effects. The way in which mitigation should be secured, and the need for a clear strategy is not drawn out. The recommendations made above in our detailed response on DM2 are the types of recommendations that we consider should have been elaborated on within the HRA.
- 16.1.1.2. **Scale of change:** The HRA fails to identify the scale of change relating to the new development – i.e. the current levels of impact and the potential for additional development to add to that harm. As the Local Plan itself states in paragraph 2.61 the proposed 21% increase in households during the Plan period represents a “*step change from both that identified through previous plans and strategies and previous rates of delivery achieved.*”

16.1.2. RECREATION

- 16.1.2.1. **Recreation:** The HRA does not provide a comprehensive review of the ways in which recreation and other urban effects may impact Epping Forest SAC. Para 3.3 – 3.21 cover pathways but fail to include the full range of pathways, for example increased fire risk, contamination of ponds (e.g. increased turbidity or chemical contamination from pet dogs); introduction of non-native species (e.g. fish in ponds); blocking of gateways preventing access for emergency vehicles (e.g. fire engines), damage to veteran trees from climbing, vandalism and other anti-social behaviour. In addition, there is the likelihood of increased root damage to trees from soil compaction and contamination and, thereby, the need for increased tree hazard assessment monitoring and the concomitant additional impacts of safety work.
- 16.1.2.2. **Greenspace mitigation:** The HRA does not address whether the level of mitigation proposed is adequate; i.e. matching mitigation measures to the impact pathways and scale of impact proposed. The one recommendation for mitigation relates to greenspace delivery without any detail as to the level of greenspace required to mitigate or whether it can be delivered.
- 16.1.2.3. **Appropriate Assessment (Recreation and Urbanisation):** The HRA does not follow the required steps set out in the legislation. The initial sift appears to be a screening stage and appears to identify likely significant effects for Epping Forest as a result of recreation and urban effects; as such these should then be considered in detail within an Appropriate Assessment; instead the HRA appears to go into more detail in an attempt to rule out likely significant effects.

16.1.3 AIR QUALITY

- 16.1.3.1. **Appropriate Assessment (Air Quality):** The HRA sets out in Chapter 6 and Appendix C to provide what it considers to be an Appropriate Assessment on Air Quality impacts on the SAC. However, The Conservators do not consider that this assessment, based on 2016



modelling, provides enough information to ensure an Appropriate Assessment which can rule out likely significant effects.

16.1.3.2. The impact of the Plan is downplayed in our view by examining a change between 'Do Something' and a 'Do Minimum' scenario that incorporates changes such as "outstanding commitments", about which there is no detail, and changes in other local authority areas, that would arise within the Plan period of 2011 - 2033. This 'Do Minimum' seems to be an 'in combination' figure rather than a baseline. The HRA Baseline itself (set at 2014) already lies 3 years into the Plan period. The 'Do Something' scenario needs to be compared to that of a 'Do Minimum' that does not incorporate increases from any Local Plan-led growth. The delay in bringing this Local Plan to Examination-in-Public until 2018-19 should not become a factor in assessing the Plan's and other 'in combination' impacts that started earlier.

16.1.3.3. When looking at the data provided by the traffic models for the Annual Average Daily Traffic (AADT) flows table on page 118 (Document EB206) the increases in traffic through the Forest, as a result of the Plans 'in combination', are very significant. For example, on the A121 to the M25 (Junction 26) the two-way flows for the Option (Option D) with the lowest increase are still raised from 25,236 in 2014 to 30,659 vehicles a day by 2033, a 21% increase in traffic through the Forest.

16.1.3.4. Although the subsequent tables in the HRA, which model the changes in NO_x and N values, show a modelled decrease in predicted pollution levels there are several key facts and uncertainties which, in The Conservators' view do not allow the Council as the competent authority to conclude that the Plan "will not adversely affect the integrity of the European Site" and which require much more detailed analysis in a full Appropriate Assessment.

16.1.3.5. Firstly, in the HRA (Document EB206) the tables on NO_x and N values (following page 123), show that in all but 4 of the 140 rows of data the predicted Critical Loads of Nitrogen (kgN/ha/yr) under the 'Do Something' scenarios remain within the 10-15kgN/ha/yr range that is internationally-recognised as damaging to temperate forest and heathland habitats such as those protected within Epping Forest SAC. As stated in para 6.9 of the HRA (page 107) the NO_x concentration, such as the level alongside the A121, is "...*certainly high enough for nitrogen deposition to be well above the critical load...*".

16.1.3.6. Furthermore, these Critical Load thresholds have been established for exposures of generally not longer than 20 years, and usually for a considerably shorter period. There is scientific evidence that Critical Load thresholds should be lower when of longer duration, such as the decades of N pollution exposure at Epping Forest SAC. One could conclude that, despite the predicted UK-wide improvement in vehicle fleet and other emissions cited in the HRA (para 2.27, page 15), the significant increase in traffic generated through the Forest, as a result of the Local Plan and 'in combination' proposals, would prevent until well beyond 2033 the very significant reductions in N pollution that are considered essential now for conservation of habitat integrity.

16.1.3.7. Thirdly, as with our concerns on recreation above, there is no certainty that the proposed mitigations of modal shift and increased junction capacity are adequate (see our detailed comments on Chapter 6 of the HRA below). In fact, some of the proposed pollution impact mitigation may involve damage to the SAC's integrity (see our comments above on Policy SP2 and below under specific points).



16.1.3.8. Fourthly, the air pollution modelling is extrapolated from traffic modelling that does not take into account the possible queueing and congestion at junctions like the Wake Arms Roundabout (HRA para 6.10, page 107). In addition, The Conservators have requested that any monitoring and modelling require pollution measurements from transects that directly abut the Wake Arms Roundabout. The HRA does not include these locations in its maps of the transects (pages 121 and 122). Therefore, the pollution levels at Wake Arms Roundabout remain unknown and the impact of the very large increases in traffic over the Plan period at this location make any conclusions in the HRA about air quality impacts uncertain.

16.1.3.9. The pollution modelling also has not yet incorporated Ammonia as a component of the N pollution (para 6.10), although this was demonstrated as significant by a PhD study in the Forest over ten years ago.

16.1.3.10. As the HRA states in para 6.13 there is a need for further refinement of the traffic modelling as well as long-term air quality monitoring, the parameters of which are currently being discussed and planned between the four local SHMA authorities, Natural England and The Conservators.

16.1.3.11. Without more information and commitment to a clear Mitigation Strategy, in which the impacts of specific mitigation options, such as capacity enlargement of the Wake Arms Roundabout, are assessed step-by-step, there cannot be a conclusion of no adverse effect on integrity of Epping Forest SAC.

16.1.3.12. As the HRA states in para 2.9 (page 12) the Plan “*must provide an adequate policy framework within which these measures can be delivered*”. In the view of The Conservators the fact that a Mitigation Strategy is not included in the wording of the policies of the Plan means that an adequate policy framework is not provided (see also our comments on Policies SP2 and DM2). As such, the Local Plan Regulation 19 Submission Version is unsound.

16.2 HRA – Representations on more specific points (Chapters 5 & 6)

16.2.1 HRA CHAPTER 5 –RECREATIONAL PRESSURE & URBANISATION

- 16.2.1.1. For urban development 400m is used as a threshold to identify whether urban effects are triggered (see **para 3.21** of the HRA). Fly-tipping is the concern singled out, yet the 400m is justified due to it relating to walking distance. Fly-tipping is usually undertaken by those with a vehicle and there is no evidence to suggest that it is limited to dwellings within 400m of the SAC. As we discuss above, the 400m in the Thames Basin Heaths is used differently, as a zone within which there is a presumption against development.
- 16.2.1.2. **Para 5.19** (first bullet top of page 101) suggests that 5km is a consistent maximum distance that visitors will regularly travel to reach inland countryside sites. This is not the case and a range of visitor surveys show distances well beyond 5km; for example, the 75% distance for Cannock Chase SAC, based on recent visitor survey data is 15km.
- 16.2.1.3. **Para 5.23** identifies that a full Mitigation Strategy has yet to be defined and **para 5.24** subsequently states that the size of the tariff remains to be determined. There is no mention of detailed mitigation measures. In other words, mitigation measures are yet to be identified and in the view of The Conservators this surely makes any conclusion of no adverse effects on integrity impossible to justify.
- 16.2.1.4. The HRA (**para 5.28**) refers to Policy DM2 wording regarding greenspace as mitigation and suggests that a 400-house threshold could be applied, such that only allocations above 400 dwellings could consider delivery of their own accessible greenspace.

There is no justification for this 400-house threshold in the HRA, but if the threshold is used, it will apply to relatively few allocations, which could severely limit its effectiveness in our view.

- 16.2.1.5. The HRA does not consider Latton Priory or North Weald Bassett developments (1,050 new houses each) as these were outside the Zone of Influence (Zoi) considered by the HRA; – but see our comments on Policy DM2 and the need for a Zoi of 6.2km. As a result, the HRA itself only lists (**para 5.28 & Footnote 53**) the two developments that make up the Epping South masterplan area – **EPP.R1 and EPP.R2**. For these two sites we have made comments under our Policy P1 response. Mitigation outside these developments (i.e. those that are not expected to ‘consume their own smoke’), therefore, must be Natural Greenspace delivered by the local authority. There is no consideration as to whether this is achievable.
- 16.2.1.6. The ‘in-combination’ section for urbanisation (**paras 5.36 - 5.37**) only refers to London Boroughs of Redbridge and Waltham Forest and fails to consider the overall quantum of growth likely around the Forest.

16.2.2 HRA CHAPTER 6 - AIR QUALITY

- 16.2.2.1. **Para 6.12** (page 107) states that the current focus for mitigation is Scenario 5 of the Highways Assessment (HA - Document EB502) that is considering alleviating congestion and thereby increasing the flows of traffic through **Wake Arms Roundabout** lying entirely within Epping Forest SAC. There is no detail given in the HRA as to how the flows would be kept to “the current base case”. In the HA it indicates that this would be achieved through unspecified **local widening** to increase approach lane and circulatory capacity (Table 3-8 of Document EB502). The Infrastructure Development Plan (IDP – Document 1101B)

16.2.2.2. Highway and roundabout widening would imply that land would need to be taken from the Forest SAC in order to achieve mitigation. The HRA does not assess the impact and an Appropriate Assessment under the Habitats Regulations is required into the implications of these mitigation options for the SAC.

- 16.2.2.3. **Para 6.13** (page 108) acknowledges the likely knock-on impacts of capacity enlargement at the Wake Arms Roundabout for other junctions in and close to the Forest such as Junctions 10 and 22 in **Table 3-8 of the HA** (Document EB502). The IDP (Document 1101B) also details proposed enhancements and makes it clear that it is “desirable” for capacity changes to the Robin Hood Roundabout (DW11 in the IDP) – entirely within the Forest SAC, along the A104. Such changes could have adverse impacts on the SAC, including on its physical integrity.
- 16.2.2.4. There are also potential losses of protected Forest Land (although non-SAC) around Junction 10 in the HA (Document EB502), which is labelled as EPP23 in the IDP (Document 1101B).

16.3 HRA - Suggested changes

16.3.1. On the basis of our representations above The Conservators consider that an Appropriate Assessment for Epping Forest SAC, into the impacts of air quality, recreation and urbanisation, must be carried out as required by the Habitat Regulations 2017. This assessment needs to examine step-by-step the impacts of mitigation options.

16.3.2. Furthermore, there must be an explicit commitment in Plan Policy to a Mitigation Strategy and the scope and framework for that Strategy should be set out in the Plan to be fully developed in a Supplementary Planning Document (SPD).

(Please also see our suggested changes for Policies DM2 and DM22 in particular).

17. CONCLUSIONS

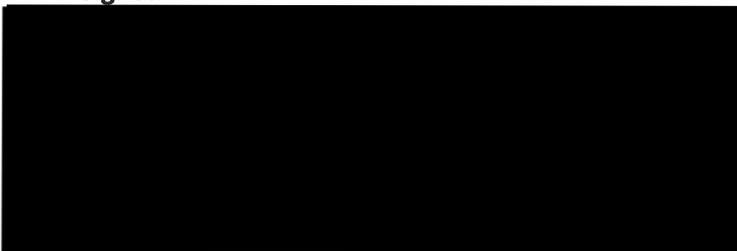
17.1. Following the points made above The Conservators of Epping Forest cannot support the Regulation 19 Submission Version 2017 of the Plan. We have registered a number of significant concerns around the protection of Epping Forest, in particular in relation to place-shaping and development management policies.

17.2. We welcome the aspiration embodied in Vision A (v), which states that "*Epping Forest will be conserved and enhanced*". We also warmly welcome the protection afforded to the Buffer Lands under the Plan Objective A (ii). The Forest is an irreplaceable asset protected for recreation and enjoyment and of international importance for biodiversity.

17.3. The Conservators, therefore, look forward to continuing to work positively with the Council and others through the Memorandum of Understanding (MoU) to produce a comprehensive Mitigation Strategy for the Forest. We also look forward to working in many other ways and through many other channels with the Council and its partners to ensure that the vision for Epping Forest and for the green infrastructure of the District can be made a reality.

-----oo00oo-----

Signed



Mr Philip Woodhouse
Chairman of The Conservators of Epping Forest
29th January 2018

cc Chief Executives and Heads of Planning at Uttlesford District Council, Harlow District Council and East Herts District Council

(For correspondence please contact: )

Chairman, Epping Forest and Commons Committee

Philip Woodhouse



Cllr John Philip
Epping Forest District Council
High Street
Epping
CM16 4BZ

Date 14 September 2018

Dear John

Response to the Proposed Interim Mitigation Strategy for the Epping Forest Special Area of Conservation (SAC) – EU Code UK0012720

Thank you for inviting myself as the Chairman of the Epping Forest and Commons Committee and Epping Forest Verderer Melissa Murphy, along with officers, to attend the Co-operation for Sustainable Development Member Board meeting in Harlow on the evening of Monday 10th September.

At that meeting you requested the City of London Corporation's response to the Interim Strategy and its Covering Report by today, even though the papers had only been available to circulate on midday Thursday 6th September. Consequently, Verderer Murphy and I have only been able to view the documents on Friday, two working days prior to the meeting.

The City Corporation also notes that this request has been made while the two key London Local Authorities, London Borough of Waltham Forest (LBWF) and London Borough of Redbridge (LBR) have still not responded in full to the draft papers, including the Conservators' mitigation proposals, which were circulated in confidence to the Borough Councils a month earlier.

'No adverse impact' and a full mitigation strategy

In light of the above, the City Corporation feels the need to reiterate that in order to properly protect the Epping Forest Special Area of Conservation (SAC) from the pressures of forthcoming proposed development, there is a requirement for a whole series of preventative initiatives need to be implemented by Local Planning

Authorities (LPAs), acting in their role as 'competent authorities' under the Habitats Regulations 2017. These initiatives need to be brought together as part of a joint, full mitigation strategy to ensure that:

- air pollution is minimised;
 - urbanisation impacts are avoided, minimised or fully mitigated;
- and,
- increasing recreational pressures are managed by effective mitigation measures,

to avoid adverse effects on the special features of the SAC.

Interim Strategic Access Management and Monitoring Strategy on recreation welcomed

As part of this series of measures, the City Corporation recognises this Interim Strategic Access Management and Monitoring Strategy (SAMMS) as significant progress and welcomes the breadth of consultation across the assembled Oversight Group, that was coordinated by your Council and held on 25th July. The City Corporation is concerned to ensure that there is no misunderstanding about the purpose of this Interim Strategy. It does not address air quality, nor could it in the continued absence of traffic modelling and air quality assessment work. Neither does the Interim strategy address the urbanisation of the SAC, other than in the context of major allocated sites.

Prevention of SAC deterioration irrespective of new growth

As the Interim Strategy points out in paragraph 10, a joint, full strategy is intended to address the requirement to avoid, or effectively mitigate, adverse impacts on the integrity of the SAC from Local Plan-led development. In addition, as paragraph 10 goes on to state, there is an additional requirement for 'competent authorities' to prevent further deterioration of the SAC features. It is most important to emphasise that this latter requirement for preventative action is irrespective of new growth. In effect, there should be at least "no net loss" and the aim should be for a "net positive impact" (enhancement) through the implementation of Local Plan policies.

Recognition of the Mitigation hierarchy

This approach of 'no net loss' or 'net positive impact' is enshrined in the mitigation hierarchy, into which this Interim Strategy is required to fit. Avoidance should be the first step and then, if not possible, any mitigation should ensure a combination of both the minimisation of impact and remediation or restoration measures to ensure no net loss. Off-site measures, such as Sustainable Alternative Natural Greenspaces (SANGS), therefore are of key importance in the EF SAC Mitigation Strategy. Mitigation of recreation pressures on-site through the measures proposed in this Interim Strategy, while necessary, will not be sufficient on their own. Some measures may only act to minimise impacts rather than avoid or fully

mitigate them. Under this Strategy, monitoring measures are proposed to review the situation, but avoidance, minimisation and remediation measures will be required outside the Forest SAC.

Off-site measures including Suitable Alternative Natural Greenspaces (SANGS)

Therefore, further work is required to provide alternative off-site recreation sites to complement the on-site measures – detailed on pages 6-10 of Appendix 1, alongside the measures necessary to resolve air pollution and urbanisation issues.

Smaller residential developments need to be able to contribute to the development of substantial SANGS sites and to do this there needs to be a SANGS tariff set alongside the proposed SAMMs tariff. The Conservators, with a 60-year record in providing a buffer for the Forest, are well-positioned to make a significant contribution to the SANGS and provide advice on the optimum measures.

Importantly, the SANGS strategy need not only look to accommodate additional recreational pressures away from the SAC but also achieve environmental enhancement and remediation measures through habitat creation and restoration. Such enhancement of the environment would provide 'competent authorities' the opportunity to achieve 'net gains'. Areas for such SANGS could include parts of the buffer lands of the Forest and the City Corporation considers that it could include areas within the Forest, but outside the SAC, such as The Lower Forest (part of Epping Forest SSSI) and Wanstead Park which already are under pressure as alternative destinations to the SAC, as the 2017 Visitor Survey demonstrated clearly in the case of Wanstead Park & Flats.

Zone of Influence (Zoi) – importance of the 75th percentile

The City Corporation is also concerned about the way in which the Zones of Influence, both 75th percentile and median (50% of visits) distances, are being re-interpreted in paragraphs 23 – 25 of the Interim Strategy. The 2017 Visitor Survey Report's clear analysis (Footprint Ecology), to recognised statistical standards, has been subjected to separate breakdown of the figures, which results in confusing new statistics. For example, the 93.06% for the 0-3km "inner zone" is put forward as representing the "percentage of visitors originating from within 0-3km Median Zone". This presumably means 93% of the 50% (the median) of total visits but there is potential for confusion here. Also, the origins of visits may change over time and vary with the season. It remains possible that a summer visitor survey would show that more visitors come from further afield than in the autumn.

It seems unusually restrictive to limit the tariffs for SAMMS to developments and housing within 3km (the median) rather than the 75th percentile for visits to the SAC. The City Corporation understands that there may be an administrative costs issue, but such a restriction seems likely to arbitrarily and unfairly limit the financial contributions amongst residential developments. The lack of visits from within 3 –

6km from within Epping Forest District is largely because there are currently few residential centres in that zone which is largely Green Belt at the moment. and, without further robust review, could result in increasing pressure for small and medium developments to be created outside the 3km boundary in the Epping Forest District in particular.

The City Corporation is also concerned about a decision being taken here that may have implications for the final strategy, based on a relationship between administrative costs and tariff benefits for the interim strategy which may not apply later. While the City Corporation recognises that the LPAs, wish to take a pragmatic approach, this should be more clearly explained. It appears to the City Corporation that as a matter of principle, where development has an impact, mitigation measures are required. If a pragmatic arrangement is to be made for the EF SAC Interim Mitigation Strategy, reflecting administrative costs, then this should be made clear in the document.

This is of significance for a SANGS tariff (see above), as the inability of small developments to provide SANGS within their own curtilage makes their contribution to this form of 'minimisation' or mitigation important. In our view, smaller developments outside 3km must contribute to a SANGS tariff and the splitting of the Zol for the SAMMs tariff currently does not seem to fit with or anticipate this. In this regard, however, the City Corporation does welcome the undertaking in the Covering Report to the Co-op Member Board that the Interim Strategy would be reviewed in the latter part of 2019.

Costs undertakings by the 'competent authorities'

As you are aware the Conservators of Epping Forest have contributed considerable time and resources to the gathering of evidence through the visitor survey and research into air quality. In addition, the SAMMs proposals included in the proposed Interim Strategy involved a very significant amount of work from City Corporation Officers and Members. These SAMMs now require further development and costing to provide a robust basis for the full Strategy. As explained above, this work needs to be paralleled by the drafting of a complementary SANGS plan, as the SAMMS cannot be put forward alone.

In relation to both SAMMS and SANGS initiatives to assist the competent authorities to complete the necessary full strategy, the City Corporation needs to identify additional resources to be able to commit further officer time. It needs to be recognised, in the City Corporation's view, that such work would need to be 'front-loaded' to both maintain the momentum to achieve the required full Mitigation Strategy and meet the requirements of the Habitats Regulations 2017 in respect of Local Plan development decisions.

To enable this work to be completed by December, the Conservators are seeking a costs undertaking to help to cover the expenditure and resources required.

Such costs undertakings would provide the opportunity to jointly produce any SANGS strategy which would hopefully demonstrate a clear 'duty to cooperate' and provide the much-needed momentum to protect the SAC whilst allowing sustainable development under the Local Plans.

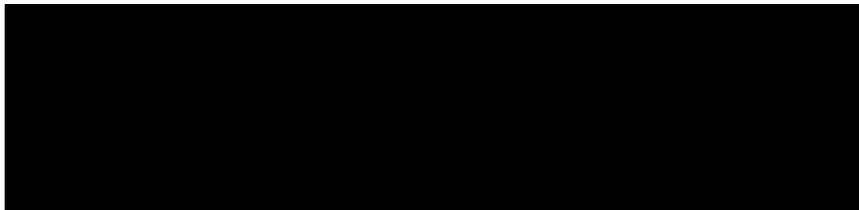
Resources available for a Mitigation Strategy

A clear component of any successful Mitigation Strategy is the implementation of mitigation measures ahead of the anticipated development pressure. The City Corporation therefore urges all the relevant authorities to ensure that they incorporate the contribution requirements within their development plans as soon as is practicable.

On behalf of the Epping Forest and Commons Committee, I would again wish to place on record my thanks for the opportunity to be fully involved in the development of the competent authority's EF SAC Interim Mitigation Strategy.

This year celebrates 140 years of the City Corporations stewardship of Epping Forest and 26 years since the foundation of the EC Habitats Directive. The adoption of an Interim Mitigation Strategy for Epping Forest marks an important further step in the continuing protection of this important international site.

Yours sincerely



Signed by
Philip Woodhouse
Chairman, Epping Forest and Commons Committee

Encs

Cc Derek Macnab, Acting Chief Executive Officer, EFDC
David Coleman - Project Manager - Planning Policy EFDC

This page is intentionally left blank

Committee(s)	Dated:
Epping Forest and Commons	14 01 19
Subject: Epping Forest Land Retention Policy – Results of initial Negotiations with Highway Authorities (SEF 2/19)	Public
Report of: Colin Buttery, Director of Open Spaces	For Decision
Report author: Paul Thomson - Superintendent of Epping Forest	

Summary

Your Committee of November 2017 adopted a Land Retention Policy which was developed to arrest the loss of Epping Forest Land dedicated to a range of Highway Improvement Schemes. Such was the concern of Members at the gradual erosion of Forest boundaries that the policy was amended at Committee to replace a proposed 1:1 replacement ratio with a gearing ratio of 1:10, which was adopted to seek additional compensatory land to help address the historic loss of Forest Land to Highway Schemes.

This report is necessary to inform Committee with regard to the lack of progress with negotiations on the initial implementation of the new Policy. Both the London Borough of Waltham Forest in relation to a pedestrianised crossing at Gilberts Slade, and Essex County Council in relation to a safe crossing point at Honey Lane, Waltham Abbey and road safety project at Lindsey Street, Epping, have resisted the City Corporation's proposals for a gearing ratio and have indicated a preference to abandon projects which have both community and Forest benefits rather than provide additional compensatory land.

The 1:10 gearing ratio has been regarded as obstructive to road safety schemes which are keenly sought by local communities. The ratio requirement currently requested exceeds any compensation code or other regulatory arrangements, such as the Land Acquisition Act requirement to replace Open Space in 'no less in area and equally advantageous as the land taken'. There a risk that this Policy could lead to the exercise of Compulsory Purchase Order (CPO) powers to acquire land for road schemes. The loss of goodwill and co-operation with the Highway and Traffic Authorities and the potential exercise of CPO powers would not be in the charity's best interests and therefore the original 1:1 compensatory approach is recommended.

Recommendation(s)

Members are asked to approve:

- i. The revision of the Land Retention Policy approach to seek a 1:1 compensatory ratio on land sought for Highway and Traffic Scheme dedications in line with the compensatory requirements of the Land acquisition Act of 'no less in area and equally advantageous as the land taken'.
- ii. Retain the discretion of the Conservators to consider requests on a case-by-case basis having regard to the best interests of the charity and the previous dedication history with the Highway Authority. Any agreement must ensure that the City is not bound to agree future highway dedication requests, even if a land retention parcel has been transferred "in lieu" of future dedications.
- iii. Where Highway and Traffic Authorities are unable to offer compensatory land already in their ownership contiguous with Forest boundaries, Committee may consider the purchase and dedication of Buffer Land as Forest Land as a suitable exchange.

Main Report

Background

1. The growing volume of road traffic on Forest roads and the increasing complexity of road safety schemes both encourage Highway Authorities to seek additional Forest Land to better manage the road network across and adjoining Epping Forest. While the Epping Forest Act provides powers for the dedication of highways, a key statutory purpose is to keep Epping Forest *'uninclosed and unbuilt on'*, resisting and abating all *'all attempts to inclose, encroach, or build on any part thereof'*.
2. As the suburbs of London have grown around the Forest, the City Corporation has previously supported road schemes on Epping Forest Land including the construction of major highways such as Rangers Road; The Whipps Cross Tramway and the Whipps Cross Roundabout, together with a plethora of road widening, bus layby and safe crossing schemes. Dedicated legislation has been enacted to manage the impact on the Forest of the M25 Motorway; A406(T) North Circular and M11 Relief Road.
3. Schemes for safe crossing points were also one of six objectives of the Epping Forest Transport Policy 2006-2016 which was adopted by your Committee on 10 November 2008. Crossing Point schemes inevitably require the dedication of roadside verge to support new infrastructure and footway treatments.
4. To address the progressive loss of Forest land your Committee of November 2017 adopted a Land Retention Policy to secure compensatory land to replace

land lost to Highway Improvement Schemes. Such was the concern of Members at the gradual erosion of Forest boundaries that the policy was amended at Committee to replace a proposed 1:1 replacement ratio with gearing ratio of 1:10 was adopted in order to signal to Highway Authorities the importance of Epping Forest Land and to address the historic loss of Forest Land to Highway and Road Safety schemes.

Background Position

Essex County Council

Bell Common Turn, Epping

5. Your Committee of 11 October 1999 has previously considered requests by Epping Forest District Council and Essex County Council for improvements to the junction of the Epping High Road (B1393) and Ivy Chimneys Road to provide a right turn filter for northward traffic at a queueing traffic pollution 'hotspot' for the District. Essex County Council has indicated that the need to provide compensatory land will make the project unviable.

Honey Lane (A121) The Woodbine Close Park Crossing, Waltham Abbey

6. Your Committee is yet to consider proposals by Essex County Council's Epping Forest Local Highways Panel (LHP) to provide a safe crossing point on Honey Lane between The Woodbine Public House and the Woodbine Close Residential Park to the north of the A121 and Epping Forest and the bus service to Loughton to the south. The crossing would also benefit horse riders entering the Forest from Woodgreen Road.
7. The crossing proposals included a substantial widening of the A121 estimated at 50.9m² of Forest land to enable the construction of a pedestrian refuge on the busy road. Officers would prefer to see a Pegasus Crossing at this point precluding the need for road widening, however, the 40mph Speed Restriction and current accident record do not currently justify a Pegasus Crossing.

Lindsey Street Spur

8. Your Committees of 15 May 2017 and 3 July 2017 considered proposals for a neutral exchange of Forest Land at Epping Green to improve the Lindsey Street/Palmers Hill junction for turning farm and heavy good vehicles in exchange for the closure of the narrow Lindsey Street 'spur' which fronts the Epping war memorial. Your Committee of 3 July 2017 approved a neutral exchange of 47m² of Forest Land.

London Borough of Waltham Forest

Woodford New Road(A104) Pedestrian Crossing

9. Your Committees of 20 November 2017 and 15 January 2018 considered a request by LBWF for the dedication of Highway infrastructure on Forest Land to accommodate a relocated Bus Shelter and the installation of a new pedestrian Pelican road crossing between Gilberts Slade and Canada Plain. A dedication of 66m² was agreed by your Committee of 15 January 2018 subject to a reduction

in speed restrictions to 30mph and the provision of compensatory land on a 1:10 ratio.

Knots Green

10. LBWF Highways have recently enquired about the potential dedication of 83m² of Epping Forest Land at Knots Green, Leytonstone, to support the construction of highway widening to include a cycle lane addition to the Lea Bridge Road and Leyton Green Road junction.

Current Position

11. Officers have commenced negotiations with Highway Authorities at Essex County Council and the London Borough of Waltham Forest for two schemes that already have Committee approval, together with two further schemes that are under early discussion prior to presentation to your Committee.

Essex County Council

Bell Common Turn, Epping

12. The matter of the Bell Common turn is further complicated by the Epping Forest District Council's Local Plan, where oblique references to an Infrastructure Plan (IP) indicate the need to make improvements to a number of road junctions to improve the increased flow of traffic associated with new developments. The IP proposals include new and improved filters lanes at Bell Common. Realistically, it is not possible to consider any road widening scheme while there is a wider threat to the Forest by major traffic schemes.

Honey Lane (A121) The Woodbine Close Park Crossing, Waltham Abbey

13. Officers for Essex County Council have indicated that the funding for the crossing point project is dependent on the standard dedication of Forest Land without compensation of 500.9m² (0.12 acres). Essex County Council has indicated that it does not have sufficient land adjacent to the Forest to exchange in order to meet the Trustee's request. A recent public meeting with residents of the Woodbine Close Residential Park indicated considerable frustration with the delay in the provision of this crossing point.

14. As with Bell Common the matter is also complicated by the Epping Forest District Council's Local Plan, where the IP indicates the need to make improvements to a number of road junctions to improve the increased flow of traffic associated with new developments. The IP proposals include a 'crawler lane' on Woodredon Hill which is contiguous with Honey Lane. Realistically, it is not possible to consider any road widening scheme while there is a threat to the Forest through a much more extensive road widening scheme.

Lindsey Street Spur

15. A safety audit by the Highway Authority design team has indicated that the widened turning at the Palmers Hill and Lindsey Street junction will no longer be safe for pedestrians to cross and therefore surfaced pathways will need to be provided along either side of Lindsey Street until a safe crossing point is

achieved. This work will require an additional 230m² of highway dedication on Forest Land. As already stated, Essex County Council has indicated that it does not have sufficient land adjacent to the Forest to exchange to meet the Trustee's request of 2,300m² (0.568 acres) of compensatory land and therefore cannot complete the proposed project.

16. Essex County Council has indicated that it is unable to offer suitable compensatory land from its existing land ownership portfolio. To help address this shortfall the City Corporation could, subject to Committee approval, consider the sale of suitable quantities of Buffer Land to compensate for the loss of Forest Land.

London Borough of Waltham Forest

Woodford New Road(A104) Pedestrian Crossing,

17. The London Borough of Waltham Forest have rejected the Trustees' request for 660m² of compensatory land, citing the return of land proposed under the Whipps Cross roundabout 'Mini-Holland' redevelopment and formal negotiations regarding the return of the Tramway at Whipps Cross Road, both of which are subject to separate negotiations. Transport for London funding for the project will expire on 31 March 2019.

Knots Green

18. The London Borough of Waltham Forest have rejected the Trustees' request for 830m² of compensatory land, again citing the return of land proposed under the Whipps Cross roundabout 'Mini-Holland' redevelopment.

Options

19. Your Committee can consider four options:

- i. **Dedication with no compensatory land:** In all cases under active consideration, your Committee could choose to dedicate the land to public highway without seeking compensatory land as has been the previous long-term practice prior to the adoption of the Land Retention Policy. Abandoning the principle of the Land Retention Policy is likely to undermine any future negotiations regarding compensatory land. **This option is not recommended.**
- ii. **Dedication on a 'like-for-like' 1:1 ratio replacement basis.** In all cases under active consideration, your Committee could choose to dedicate the land to public highway seeking compensatory land on an initial 1:1 replacement ratio without seeking a gearing mechanism at this stage. This approach would establish the principle of compensatory land and reflect the compensation code and other regulatory arrangements, such as the Town & Country Planning Act requirement to replace Open Space on a 'like-for-like' basis. **This option is recommended.**

- iii. **Maintain the Land Retention Policy approach of seeking a 1:10 gearing ratio on Highway dedications.** Officers would continue to promote the Trustee's view that Epping Forest Land is important and needs to be replaced at a higher ratio to reflect both its scarcity and historic loss. An unequivocal position is arguably necessary to set a clear precedent on any future highway dedications. This approach would exceed any compensation code or other regulatory arrangements, such as the Town & Country Planning Act requirement to replace Open Space on a 'like-for-like' basis. There is a risk that this Policy could lead to the exercise of Compulsory Purchase Order (CPO) powers to acquire land for road schemes. **This option is not recommended.**
- iv. **A reduction in the Land Retention Policy approach of seeking a 1:10 gearing ratio on Highway dedications to a figure above 1:1 but below 1:10.** Again, this approach would exceed any compensation code or other regulatory arrangements, such as the Town & Country Planning Act requirement to replace Open Space on a 'like-for-like' basis. There is a risk that this Policy could lead to the exercise of Compulsory Purchase Order (CPO) powers to acquire land for road schemes. **This option is not recommended.**

Proposals

- 20. It is proposed to revise the Land Retention Policy approach of seeking a 1:10 gearing ratio on Highway dedications replacing it with a 1:1 or 'like-for-like' approach to clearly signal the City Corporation's approach to land retention of scarce and protected Forest Land, to reflect existing compensatory codes and also to support co-operation with Highway and Traffic Authorities for schemes that will be beneficial to Forest communities and Epping Forest objectives.

Corporate Strategy Implications

Implications

- 21. **Legal** – Section 7(1.) of the Epping Forest Act 1878 states that *'the Conservators shall at all times keep Epping Forest unenclosed and unbuilt on, ...and they shall by all lawful means prevent, resist, and abate all future inclosures, encroachments and buildings, and all attempts to inclose, encroach, or build on any part thereof'*.
- 22. Section 38 of the Act which outlines the General powers of the Conservators includes at section (1)(iv.) a power *'To maintain and make roads, footpaths, and ways and to dedicate roads to the public, subject to the law of highways, and to afford facilities and grant rights of way for access to inclosures'*. There is therefore power to dedicate Forest Land for roads.
- 23. The power to acquire additional Forest Land under section 33.(1.)(xxvi.) of the Epping Forest Act 1878 is specifically limited to lands adjoining the Forest or reputed to have been formerly part of the waste lands thereof.

24. Any policy should retain the discretion of the Conservators to consider requests on a case-by-case basis having regard to the best interests of the charity. Any agreement must ensure that the City is not bound to agree future highway dedication requests, even if a land retention parcel has been transferred “in lieu” of future dedications. Each request would need to be considered on a case-by-case basis.
25. While section 14 of the Ministry of Housing and Local Government Provisional Order Confirmation (Greater London Parks and Open Spaces) Act 1967 specifically allows for the transfer of Public Open Space between Local Authorities some Local Authority Public Open Spaces may be inalienable being dedicated under the Open Spaces Act 1906 or through individual restrictive covenants.
26. The ratio requirement currently requested exceeds any compensation code or other regulatory arrangements, such as the Land Acquisition Act requirement to replace Open Space. There is a risk that this Policy could lead to the exercise of Compulsory Purchase Order (CPO) powers to acquire land for road schemes. The loss of goodwill and co-operation with the Highway and Traffic Authorities and the potential exercise of CPO powers would not be in the charity’s best interests and therefore a revised 1:1 compensatory approach of ‘no less in area and equally advantageous as the land taken’ is recommended.
27. Under section 19 of the Acquisition of Land Act 1981 the relevant Secretary of State would provide a certificate indicating his or her satisfaction that either:
- exchange land is being given which is no less in area and equally advantageous as the land taken (section 19(1)(a)); or
 - that the land is being purchased to ensure its preservation or improve its management (section 19(1)(aa)).
28. **Financial** – The cost of the Highway Improvement Schemes will be fully met by the relevant Highway Authority and will not place requirements on City Corporation capital or local risk budgets.
29. A 1:1 replacement ratio within the Land Retention Policy is unlikely to impose increased management costs, in that compensatory land would be managed at a similar level of cost. It is acknowledged that the transferring authority will enjoy an overall saving where public open space is transferred to the City Corporation and within large schemes this could be addressed where appropriate by a commuted sum. There may be additional costs where larger parcels of land are transferred in anticipation of further dedications or where a highways maintenance regime such as verge cutting is lost. These additional costs would need to be balanced alongside the policy ambition of arresting the overall loss of Forest Land.
30. **City of London Corporate Plan 2018 - 2023**: the protection of Epping Forest directly underscores the *third pillar* of the Corporate Plan, which is to “**shape outstanding environments**”. The policy approach outlined in this report supports *Outcome 12* “Our spaces are secure, resilient and well-maintained”.

31. **Open Spaces Department Business Plan 2016-19:** The Strategic Vision of this Business plan is to ‘Preserve and protect our world class green spaces for the benefit of our local communities and the environment.’

Conclusion

32. Highway Authorities are seeking to work in the best interests of Council tax payers by delivering value-for-money projects and services. The gearing ratio set out within the Land Retention Policy sets a clear standard for compensatory land in response to Highway dedication requests.
33. A robust policy is required to halt the loss of scarce Forest Land to continuing highway dedication and it is recommended that the ratio exchange is changed to 1:1 rather than 1:10 to reflect the compensatory codes contained within the Town and Country Planning and Land Acquisition Acts, which will also allow the City Corporation to work in effective partnership with Highway and Traffic Authorities.
34. For Highway Authorities who own land suitable for transfer to the City Corporation, other than legal fees, there are no costs to the Local Authority for providing compensatory land. The Authority would enjoy a small potential saving in grounds maintenance expenditure in the long-term. For authorities without access to suitable compensatory land, there will be an additional project cost to meet the purchase cost of suitable land for exchange. It is further proposed that where Local Authorities experience difficulties in acquiring suitable compensatory land suitable parcels of Buffer Land could be offered with the appropriate Committee approval.

Background Papers

Epping Forest & Commons Committee Land Banking Report November 2017

Paul Thomson

Superintendent of Epping Forest

T: 020 8532 5300

E: paul.thomson@cityoflondon.gov.uk

Committee(s)	Dated:
Epping Forest and Commons	14 01 2019
Subject: Proposed Construction of a Flood Alleviation Scheme at Hillyfields Loughton (SEF 4/19)	Public
Report of: Colin Buttery, Director of Open Spaces	For Decision
Report author: Tristan Vetta – Senior Forest Keeper, Epping Forest	

Summary

This report is necessary to update your Committee on the findings of a Surface Water Management Plan (SWMP) commissioned by Essex County and Epping Forest District Councils in 2016, to address potential 1:50 flood risks to properties in the Loughton area. The SWMP has identified Epping Forest Land held in trust by the City Corporation, together with adjacent Public Open Space, held by Loughton Town Council, at Hillyfields as a Critical Drainage Area (CDA), where 70 adjacent residential properties are at risk of flooding from surface water flooding.

Essex County Council has proposed a Flood Alleviation Scheme (FAS) which will require the construction of an earth bund to create a Flood Storage Area (FSA) on City Corporation and Town Council Land. While the character of the land will be changed by an earth bund proposed in this scheme, as well as reducing the flood risk to 70 neighbouring residential properties, there are opportunities to make habitat improvements and to increase the security of the site from illegal occupation, therefore this scheme is recommended for adoption.

Recommendation(s)

Members are asked to:

- i. Approve the use of Forest Land at Hillyfields/Pyrls Lane, Loughton as a Flood Alleviation Scheme as part of Essex County Council's Surface Water Management Plan.
- ii. Enter into a formal agreement with Essex County Council for the ongoing management of the Flood Alleviation Scheme with all costs to be borne by the County Council
- iii. Instruct the Comptroller & City Solicitor to undertake any necessary documentation to conclude the agreement.

Main Report

Background

1. The 1882 Epping Forest Arbitration Award ceded a series of interconnected roadside verges running between Baldwins Hill and Theydon Green to Epping Forest. One section of this Forest Land is located on the junction of Rectory Lane and Pyrles Lane, Loughton. The piece of land is approximately 4,047m² (1 acre) which is depicted in Appendix 1. There are no City of London Corporation facilities on this 'satellite' site and it is not visually obvious that the land forms part of Epping Forest.
2. This small area of Forest Land sits on the southern edge of a larger piece of public open space, formed as part of the post-War Debden Estate, and is known as Hillyfields or Millennium Common, which is under the ownership of Loughton Town Council. To maintain a uniform approach to the management of the site, the Forest Land is under a care and maintenance agreement with Loughton Town Council (LTC). The grass cutting on the site is currently conducted by Loughton Town Council with the City Corporation being responsible for all other aspects of management.
3. Epping Forest hosts two Flood Alleviation Schemes (FAS) on Forest Land – The Thornwood FAS at Lower Forest and the Loughton FAS at Staples Road Pond, Loughton. A further major FAS scheme is located on Buffer Land at Cobbins Brook which protects 314 properties at Waltham Abbey from a 1:50 flood event.

Current Position

4. Capita Consultants, working on behalf of Essex County Council and Epping Forest District Council, completed a Surface Water Management Plan (SWMP) for Loughton, Buckhurst Hill and Theydon Bois in 2016. SWMPs outline the predicted risk and preferred surface water management strategies for discrete areas. Computer modelling has identified areas at a significant risk of flooding which are characterised within the SWMP as Critical Drainage Areas (CDA).
5. Forest Land on the junction of Rectory Lane and Pyrles Lane, Loughton has been identified as a CDA. Each CDA has site-specific measures designed to address the CDA risks. At Rectory/Pyrles Lane, the main aim of the CDA scheme is to reduce flood risk to 70 properties in the immediate area.
6. Essex County Council has sought the support of the City Corporation and Loughton Town Council to help manage flood risk at the Hillyfields site. Previously, the City Corporation has worked in partnership with neighbouring land-owners, local authorities and the Environment Agency with flood alleviation scheme (FAS) projects to ensure reduced flood risk to our neighbours and to maintain the City Corporation's reputation as a collaborative authority and responsible land-owner. Examples of significant FAS projects on Forest Land include Loughton Brook-Staples Road Pond and Thornwood Common, Lower Forest. In addition, the importance of the Forest's Buffer Lands for flood

protection was demonstrated when a significant portion of Warlies Park was incorporated into a very large FAS project by the EA itself in 2008 in order to protect Waltham Abbey from flooding. The proposal also reflects the 'ecosystem services' approach, pioneered in the Epping Forest Quality of Life Capital Study (2003) commissioned by the Conservators and other local authority partners in the Epping Forest Liaison Group which seeks to use Forest Land for wider environmental and social benefit.

7. As well as the flood risk, Forest Land at Rectory/Pyrles Lane and Public Open Space at Hillyfields has also seen three traveller incursions over the last two years. The construction of this FAS would substantially reduce the available space for traveller vehicles to occupy the site.

Options

8. **Option 1: Approve the construction of a FAS under a Memorandum of Understanding** - This option would see construction and future management agreed on the basis of a Memorandum of Understanding (MoU) with Essex County Council as proposed by the Local Authority. The MoU is not felt to provide sufficient protection for the City Corporation in terms of long-term liability for maintenance and repair. **This option is not recommended.**
9. **Option 2: Approve the construction of a FAS under Licence** - Under this option construction and management would require the drafting of a Licence agreement with Essex County Council and Loughton Town Council with greater clarity regarding 'Long-Term Maintenance'.> This would allow the City Corporation to ensure that Essex County Council remains responsible for the future management of the scheme. **This option is recommended.**
10. **Option 3: Decline the installation of the scheme upon City Corporation Forest Land** . Given that the scheme has been identified as a CDA the City Corporation should be seeking to act as a responsible neighbour to support flood reduction schemes. **This option is not recommended.**

Proposals

11. The scheme will be constructed on Forest Land on land under the ownership and management of Loughton Town Council. The FAS will consist of a new flow path interception landscaped earth bund is to be constructed in Hillyfields Open Space with an associated raised kerb line on the cycle track to the south. This will reduce flood risk to downstream properties.
12. The FAS storage area will comprise of a landscaped earth bund along the southern corner of the Hillyfields Open Space boundary, with an approximate length of 60m, maximum height of 1.2m and maximum width of 8.1m. Water will discharge from the attenuation (the storage and controlled release of surface water run-off) at a controlled rate via a new connection into the existing Thames Water surface water system. The material used to construct the bund is to be

cohesive clay, and it is proposed to source this from the on-site material. The bund and open excavation once constructed is topped with a minimum of 100mm topsoil.

Corporate & Strategic Implications

City of London Corporate Plan 2018-2023

13. People are safe and feel safe: a) Prepare our response to natural and man-made threats & c) Protect consumers and users of buildings, streets and public spaces.

Open Spaces Department Business Plan 2016-19

14. **Our spaces are secure, resilient and well-maintained:** b) Build resilience to natural and man-made threats by strengthening, protecting and adapting our infrastructure, directly and by influencing others.

15. **Open spaces and historic sites are thriving and accessible:** 2) London has clean air and mitigates flood risk and climate change.

Implications

16. **Legal** – The Epping Forest Act 1878 provides Trustees with powers under *Section 33(1.)(ii.) ‘To dig and remove gravel, sand, clay, loam and turf and drain, level and improve the soil and subsoil, as far as in their judgment (sic) may be necessary or desirable for the purposes of management’*. *Section (1.)(v.) provides for further power ‘To make ponds, and enlarge or clean out and maintain or fill up ponds, streams, watercourses and springs;’*

17. Your Committee has previously supported the amalgamation of Forest Land with the new Public Open Space created through the construction of post-War Debden Estate. It was acknowledged at this time that some of the natural aspect character of the site would be subsumed by its proximity to a large open space managed primarily for public recreation.

18. **Financial** - There will be no financial implications for the City of London if the entirety of the scheme’s construction and on-going maintenance and inspections is completely assigned to the responsibility of Essex County Council. The approval of the scheme will alter the visual look of this part of the Forest and the wider landscape. However, the entire construction will be as sensitive as possible to the surrounding land. Close supervision by Officers has achieved beneficial improvements at previous FAS projects.

19. There is potential that a small oak tree may need to be removed to accommodate the scheme. Officers from both the City Corporation and Loughton Town Council will seek to mitigate the construction by seeking to secure landscape improvements around tree planting and potentially the introduction of marginal water plants with the FSA.

20. **Health** - Flood risk, the scheme is intended to reduce flood risk to 70 nearby properties, where there are evident health risks if flooding was to occur. Flood

risk is expected to increase as human driven climate change is expected to increase the likelihood of severe weather episodes.

21. **Structural**, the earth bund construction does not pose any major health risks and its relatively small size will reduce the risk of slumping or collapse as can occur on higher earth structures.

Conclusion

22. Given the location of this outlier of Forest Land at Rectory/Pyrles Lanes amidst the Debden Estate the character of the site already reflects the largely functional and utilitarian Public Open Space style of the larger neighbouring Hillyfields site rather than the 'natural aspect' more commonly experienced in the main body of the Forest. Consequently, the current nature of this site will not be greatly altered by the FAS installation and will not have implications for the 'natural aspect' of the site.
23. As with previous FAS schemes hosted within the Forest and Buffer Land, Trustees will need to consider the wider public role of supporting a CDA scheme designed to protect 70 residential properties from flooding, enhanced site security regarding illegal occupation and the provision of opportunities for habitat enhancement.

Appendices

- Appendix 1 – Map of City of London Land holding at Pyrles Lane/Hilly Fields.
- Appendix 2 - Photograph of site
- Appendix 3- Hillyfields Open Space Flood Alleviation Scheme, Loughton: Memorandum of Understanding Between Essex County Council and The City of London Corporation
- Appendix 4 – Technical Drawings (B3553M05-JAC-EPP2-NW-DR-C-001,002&003)
- Appendix 5 – Letter to Loughton Residents, highlighting the need and rationale of the scheme.

Background papers

Report to Epping Forest & City Commons Committee ' Proposed Cobbins Brook FAS'

Report to Epping Forest & City Commons Committee ' Proposed Loughton FAS'

Report to Epping Forest & City Commons Committee ' Proposed Thornwood FAS'

Tristan Vetta

Senior Forest Keeper, Epping Forest

T: 0208 532 1010 or 07734855051

E: tristan.vetta@cityoflondon.gov.uk



Appendix.1 City of London land holding at Pyrles Lane/Hilly Fields.

■ Forest Land

Created By:
Tristan Vetta

Date Created
7 Dec 2018



© Crown copyright and database rights 2018 OS 100023243

This page is intentionally left blank



This page is intentionally left blank

Hillyfields Open Space Flood Alleviation Scheme,

Loughton:

Memorandum of Understanding

Between

Essex County Council

And

The City of London Corporation

This Memorandum of Understanding (MoU) is made on the 18th January 2017 between:

1. Essex County Council: County Hall, Chelmsford, Essex,
CM1 1QH
2. The City of London Corporation, PO Box 270, Guildhall, London EC2P
2EJ.

Purpose of the Memorandum of Understanding (MoU)

Essex County Council (ECC) and The City of London Corporation (CLC) have a common interest in reducing flood risk to households and businesses in Loughton, Essex. This will only be achieved by adopting practices consistent with the recommendations made in the Pitt review into the 2007 summer floods, the Flood and Water Management Act (2010), Department for Environment, Food and Rural Affairs (DEFRA) and Environment Agency (EA) guidance for implementing flood and coastal resilience funding partnerships. These practices include Lead Local Flood Authorities (LLFAs) taking a proactive role in the management of local flood risk by initiating partnerships with all relevant parties involved in local flood risk management. And in turn, all relevant risk management authorities should endeavor to share information and cooperate with LLFAs in order to facilitate an efficient and joined up management of local flood risk. The purpose of this MoU is to set out the principles and framework for how ECC, CLC will work together to reduce flood risk to the residents and businesses downstream of Hillyfields Open Space, Loughton, Essex.

Background

In 2016 a Surface Water Management Plan (SWMP) was produced for Loughton, Buckhurst Hill and Theydon Bois. SWMP's identify smaller catchments at higher risks of surface water flooding, termed Critical Drainage Areas (CDAs). The EPP2 CDA was identified within this SWMP and covers Pyrles Lane and Colebrook Lane. It has been proposed that the flood risk in the CDA be managed by the construction of a landscaped earth bund within Hillyfields Open Space. This scheme is the preferred option as outlined in the EPP2 Appraisal Report as it offers the storage of flows generated in the catchment during extreme events and ensures controlled release back into the existing system. This option involves situating a landscaped bund within a large area of land (owned by CLC and The City of London Corporation) within the upper reaches of the catchment. The design of the attenuation features means that will be dry under normal circumstances and only contain water during high intensity or prolonged rainfall events.

This MoU formalises the agreement between the risk management authorities to work in partnership in order to promote, develop, design, deliver, adopt and maintain the Hillyfields Open Space Flood Alleviation Scheme (the scheme). The scheme will reduce flood risk to 70 properties in the Pyrles Lane and Colebrook Lane area. ECC as the LLFA has initiated and led the process of delivering the scheme. This document outlines the Memorandum of Understanding that will guide the nature of cooperation and partnership working between ECC, CLC during and after the development, design, delivery and commissioning of the scheme. This MoU is in accordance with the recommendations of the Pitt review into the 2007 floods, the Flood and Water Management Act (2010) and the Department for Environment, Food and Rural Affairs (DEFRA) and EA guidance for implementing flood and coastal resilience funding partnerships.

Scope of works

A new flow path interception landscaped earth bund is to be constructed in Hillyfields Open Space, Loughton with an associated raised kerb line on the cycle track to the south. This will reduce flood risk to downstream properties. The storage area will comprise of a landscaped earth bund along the southern corner of the Hillyfields Open Space boundary, with an approximate length of 60m, maximum height of 1.2m and maximum width of 8.1m. Water will discharge from the attenuation at a controlled rate via a new connection into the existing Thames Water surface water system.

The material used to construct the bund is to be cohesive clay, and it is proposed to source this from the on-site material. The bund and open excavation once constructed is topped with a minimum of 100mm topsoil.

Parameters for partnership agreement

Partners signed up to this Memorandum of Understanding (MoU) will work towards the following:

1. Sharing a common understanding of the causes and consequences of the flooding problems experienced by the residents of the EPP2 CDA as outlined in the Project Appraisal Report (PAR)
2. A shared goal of reducing the level of flood risk experienced by the residents of EPP2 CDA by agreeing that the proposed solution to the flooding problem is the construction of a bund within Hillyfields Open Space. This scheme is the most technically, financially and environmentally feasible flood risk management option as outlined in the optimisation report.
3. Agreeing to undertake enduring collaborative and effective actions aimed at the promotion, approval, funding, delivery, adoption and maintenance of the scheme
4. A formal agreement that ECC, as LLFA, will be the project lead in designing and delivering the scheme
5. A formal agreement that CLC, as the landowner will be responsible for the maintenance of the flood attenuation feature whilst tenancy is in place. Further detail around maintenance can be found below.
6. A commitment from the project lead that standards for project management, procurement transparency, budgetary and financial compliance are met and maintained throughout the design and delivery phases of the scheme
7. A commitment from all the partners to assign adequate personnel, staff and technical resources to promote, develop, design, deliver and maintain the scheme throughout its whole life
8. Establishing a formal collaboration between the executive officers, senior managers or elected members from the respective partners confirming and detailing the level of funding expected from each partner as well as a comprehensive schedule of payments for the delivery of the scheme
9. The agreement should also outline the terms and conditions for the provision of the funds, allowances should be made for any contingencies, variations and risks and other concerns about the funding should be clearly addressed in the agreement
10. Ensuring other partners meet their commitments to deliver the scheme
11. Making a commitment to establish and actively participate in an effective governance and management structure including attending regularly scheduled meetings, sharing information as and when required in the duration of the scheme, keeping partners involved with up-to-date developments as the project progresses and agreeing to implement specific action plans
12. A formal commitment to adhere to the timeline for the scheme scheduled to be delivered by the end of this financial year (March 2019)
13. Any agreements with suppliers should not be legally binding until formal partnership funding arrangements are in place

By agreeing to the aims stated above, the parties will thus agree to establish a project programme developed around the following themes:

- Funding: ECC as the lead partner will co-ordinate the funding arrangements for the delivery of the scheme.
- Delivery: ECC as the lead partner will manage the development and delivery of the scheme.
- Oversight: ECC as the lead partner will monitor, supervise and receive regular reports from the suppliers and contractors and provide strategic inputs in order to steer the development and delivery of the scheme.
- Skills and expertise: ECC as the lead partner will ensure that the design and delivery of the scheme is governed and carried out by competent and experienced officers in the Flood and Water Management Team. Charlotte Smith will be the Project Officer for the scheme and Dave Chapman will be the Project Overseer.
- Communication: ECC as the lead partner will conduct update meetings with other partners and stakeholders in order to keep all parties well-informed on developments concerning the delivery of the scheme.
- Long term maintenance: CLC as part landowners have agreed to manage the scheme upon completion and regular provision of the state of the attenuation feature for the purposes of our flood asset register whilst tenancy is in place. Maintenance will comprise of-

Embankment and Spillway	Control Structure	Access
As required		
a) Grass on spillway crest and slope to be cut as required to keep it between 75mm and 150mm length.		

Grass cuttings should be collected or mulched to ensure they do not impede growth beneath. b) Treatment of any broad leaved weeds on the spillway. c) Remaining embankments to be cut and kept tidy to allow for visual checks (approx. 2-3 cuts during the growing season).		
6 Monthly		
a) Check the embankment for any seepage, cracks, movement or damage, if evident it must be reported to the LLFA for further investigation. b) Check the embankment for any damage caused by burrowing animals or pedestrian access. If evident, it must be reported to the LLFA for further investigation. c) Ensure that all tree/bush growth is removed from the embankment and new growth controlled. d) Check that there are no obstructions (which could cause turbulence and scour) on the embankment, embankment crest and spillway (e.g. sign posts, benches or large debris).	Check that the inlet and trash screen are clear of trash/debris (clear as required)	
Prior to forecasted heavy rain		
	Check that the outfall structure and trash screens are clear of trash/debris (clear as required)	
Immediately following extreme rainfall event		
a) As 6 monthly plus: b) Check for erosion of the embankment and spillway, it must be reported to the LLFA for further investigation. c) Check for signs of seepage through the bund, particularly along the downstream toe and the area surrounding the downstream headwall.	As 6 monthly	
Annual		
a) Rodding of the filter drain along the toe of the attenuation bund to ensure water is able to flow freely.	a) Inspect the hand railing surrounding the headwalls for damage and deterioration and repair/replace if required. b) Visually check that the outlet pipe is free from blockage and sediment build up, clear as required	a) Check the condition at the base of the spillway and make good as required. b) Check the condition of the outlet structure access steps and made good as required.
Additional		
Yearly for 3 years then 5 yearly: Deformation survey to monitor settlement/movement of the embankment crest: Following an initial baseline set of 3 surveys carried out once per year the frequency can be reduced to once every 5 years. Results should be reviewed and if significant settlement is observed engineering advise should be sort.	10 yearly: carry out CCTV survey of outlet structure	

Working arrangements

	Roles	Essex County Council (Project Lead and Sponsor)
Tier 1	Project executives	Ian Doyle (Head of Operational Delivery)
Tier 2	Project managers	Dave Chapman (Project Overseer and Delivery and Enforcement Manager)
Tier 3	Project officers	Charlotte Smith (Lead Project Officer)

The parties involved in this partnership will engage in productive collaboration in order to achieve a timely delivery of the scheme. This would be carried out by adhering to the EPP2- Hillyfields Open Space flood alleviation scheme MoU governance structure. This governance arrangement comprises of three tiers of responsibility. Project steering and high level monitoring will be undertaken by the project executives who will also be the signatories to this MoU from each partner organisation. Regular project monitoring, direct supervision and overview would be undertaken by representatives at the project manager and officer levels. Informative meetings would occur between representatives from all the parties at all levels but this would be more frequent for partner representatives at the project manager and officer levels. The organisational structure of this MoU will be regularly reviewed and amended as required in order to reflect changes as the scheme progresses.

Hillyfields Open Space FAS MoU Governance Structure

The project overseers and officers will meet on a 2 weekly basis in order to ensure a seamless and timely process in the design and delivery of the scheme. Project executives would also meet up and make decisions to provide high level steering and guidance for the project managers and officers however this would not be as frequent as the overseers and officers and would be determined as and when circumstances demand.

Legal implications of the MoU

The partners recognise that this is not a legally binding document. This MoU will not affect the statutory duties, responsibilities or other legal rights and obligations of any partner.

Confidentiality

Information disclosed by any party which is declared as confidential should be treated as such. Similarly any information disclosed which the recipient should reasonable be expected to know is confidential, must be treated as such. Any sharing of data, not related to this scheme between the partners will be subject to separate legal agreements.

Duration of the MoU

It is expected that this Memorandum of Understanding will remain valid throughout the duration of the design, delivery and commissioning of the scheme.

Signatories

For Essex County Council

Name: _____

Position: _____

Signature:

Date: _____

For The City of London Corporation

Name: _____

Position: _____

Signature:

Date: _____

Statutory responsibilities of parties who have signed this Memorandum of Understanding

Essex County Council

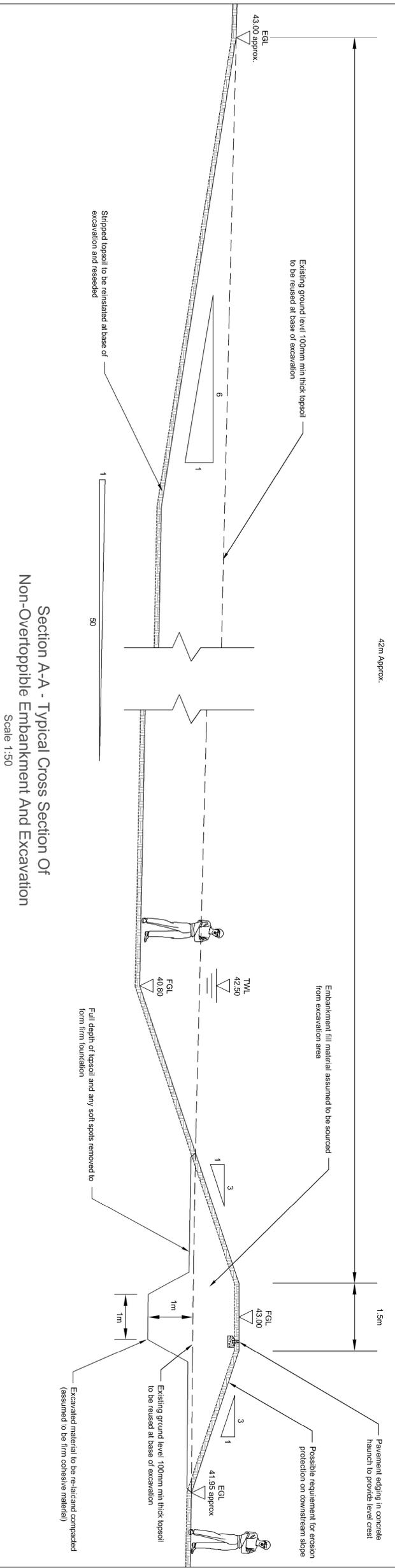
As the Lead Local Flood Authority, we are responsible for developing, maintaining and applying a strategy for local flood risk management in our area and for maintaining a register of flood risk assets. We also have lead responsibility for managing the risk of flooding from surface water, ground water and ordinary watercourses.

The City of London Corporation

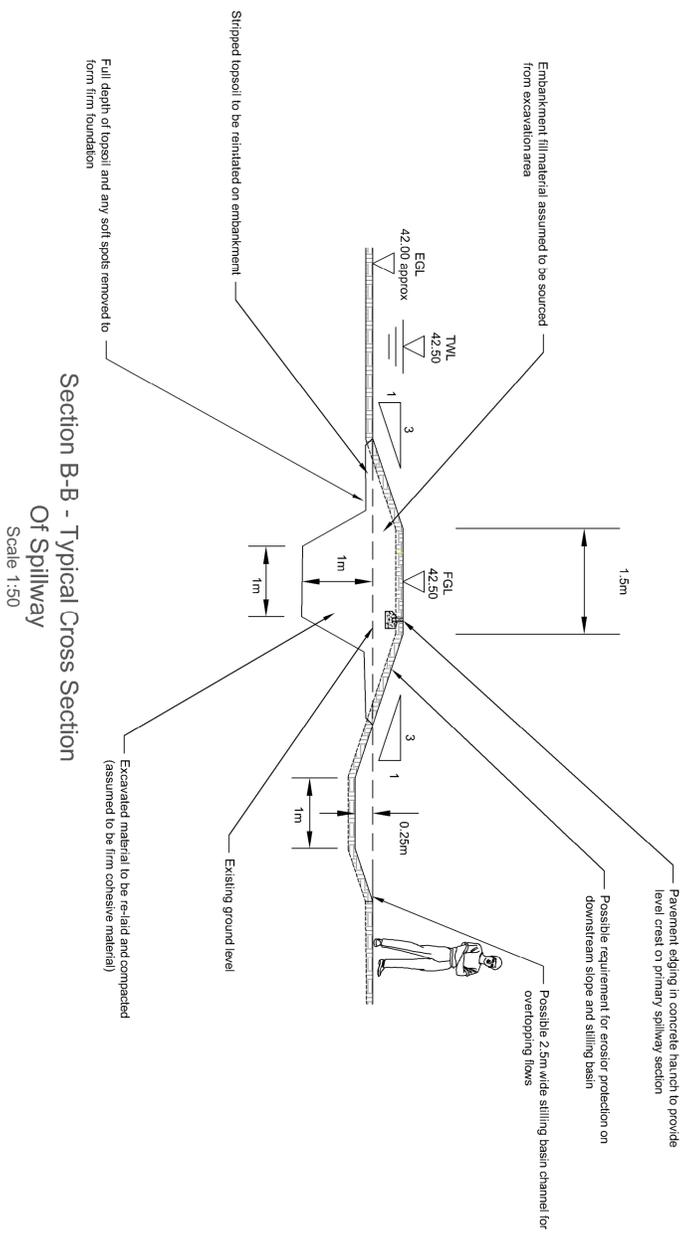
To maintain the site in accordance with any existing agreements.

This page is intentionally left blank

NOTES
 1. For location of sections see drawing B3553M05-JAC-EPP2-NW-DR-C-0001



Section A-A - Typical Cross Section Of Non-Overtoppable Embankment And Excavation
 Scale 1:50



Section B-B - Typical Cross Section Of Spillway
 Scale 1:50



This drawing is not to be used in whole or part other than for the intended purpose and project as defined on this drawing. Refer to the contract for full terms and conditions.

Rev	Date	Description of revision	Drawn	Checked	Reviewed/Approved
1	08/18	Sections of storage area	OW	TD	AC AW

DRAWING STATUS
 OUTLINE DESIGN - FOR PLANNING



Essex Highways, Seax House, Victoria Road South, Chelmsford, CM1 1QH.
 Tel: 0345 6037333
 © Essex County Council

SCHEME TITLE
**PYRLES LANE AND COLEBROOK
 LANE FLOOD ALLEVIATION
 SCHEME**

DRAWING TITLE
**OUTLINE DESIGN
 HILLYFIELDS OPEN SPACE
 SECTIONS**

DESIGNED	DRAWN	CHECKED	REVIEWED	APPROVED
OW	OW	TD	AC	AW
DATE	DATE	DATE	DATE	DATE
25/07/18	25/07/18	30/07/18	30/07/18	3/08/18

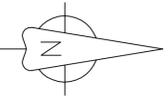
DRAWING STATUS
 DIMENSIONS IN METRES
 LEVELS IN METRES
 SCALE AT A1 (B3553M05)
 1:50

DRAWING NO.
B3553M05-JAC-EPP2-NW-DR-C-0002

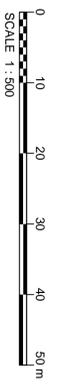


This map is reproduced from Ordnance Survey material with the permission of Ordnance Survey under license. All other material is the copyright of the publisher. Ordnance Survey material is reproduced in full or in part under license from Ordnance Survey. All other material is the copyright of the publisher. Ordnance Survey material is reproduced in full or in part under license from Ordnance Survey.

This page is intentionally left blank



- LEGEND**
- Red line boundary
 - Proposed construction site compound
 - Proposed access route



This drawing is not to be used in whole or part other than for the intended purpose and project as defined on this drawing. Refer to the contract for full terms and conditions.

Rev.	Date	Description of revision	Drawn	Checked	Reviewed/Approved
1	08/18	OUTLINE DESIGN	OW	AC	AW

DRAWING STATUS: OUTLINE DESIGN - FOR PLANNING



Essex Highways, Sax House, Victoria Road South, Chelmsford, CM1 1QH.
Tel: 0345 6037331 @ Essex County Council

DRAWING TITLE
PYRLES LANE AND COLEBROOK LANE FLOOD ALLEVIATION SCHEME

DRAWING TITLE
OUTLINE DESIGN
HILLYFIELDS OPEN SPACE
REDLINE BOUNDARY

DESIGNED	DRAWN	CHECKED	REVIEWED	APPROVED
OW	OW	TD	AC	AW
DATE: 25/07/18	DATE: 25/07/18	DATE: 30/07/18	DATE: 30/07/18	DATE: 3/08/18

DRAWING NO: B3553M05-JAC-EPP2-NW-DR-C-0003
SCALE AT A1 (900x600mm) DIMENSIONS IN MILLIMETRES LEVELS IN METRES 1:500



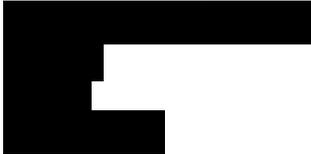
This map is reproduced from Ordnance Survey material with the permission of Ordnance Survey. All rights reserved. Ordnance Survey reproduction in any form is prohibited. Ordnance Survey is a registered trademark of Ordnance Survey. Ordnance Survey is a registered trademark of Ordnance Survey. Ordnance Survey is a registered trademark of Ordnance Survey.

This page is intentionally left blank

Essex County Council
Flood and Water Management Team
E3 Zone 1 County Hall
Chelmsford
Essex, CM1 1QH

Date: 16/07/2018
Our Ref: EPP2 FAS

The Resident,

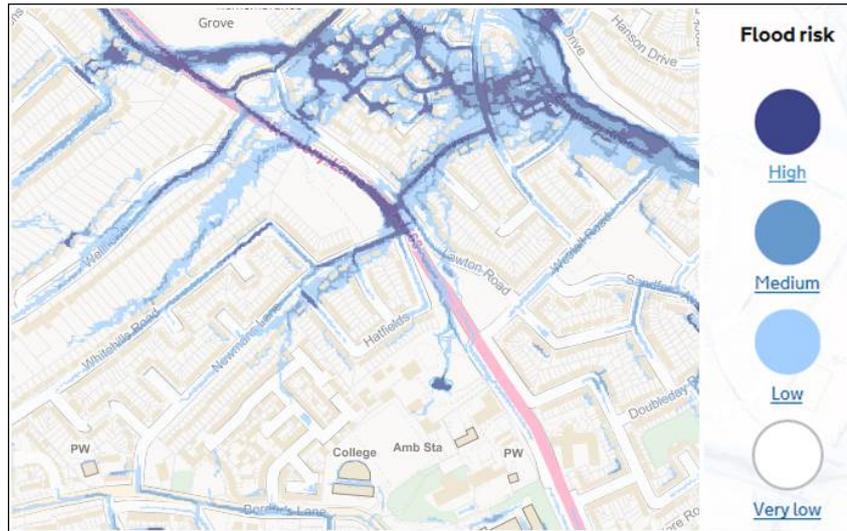


Dear Sir/ Madam,

POTENTIAL FLOOD ALLEVIATION SCHEME, HILLYFIELDS, LOUGHTON.

As Lead Local Flood Authority, Essex County Council (ECC) has a responsibility for managing local flood risk under the Flood and Water Management Act 2010. This is defined as flooding from surface water, groundwater and ordinary watercourses. ECC also has a duty to produce a Local Flood Risk Management Strategy (LFRMS) identifying areas at highest risk and outlining measures to reduce them.

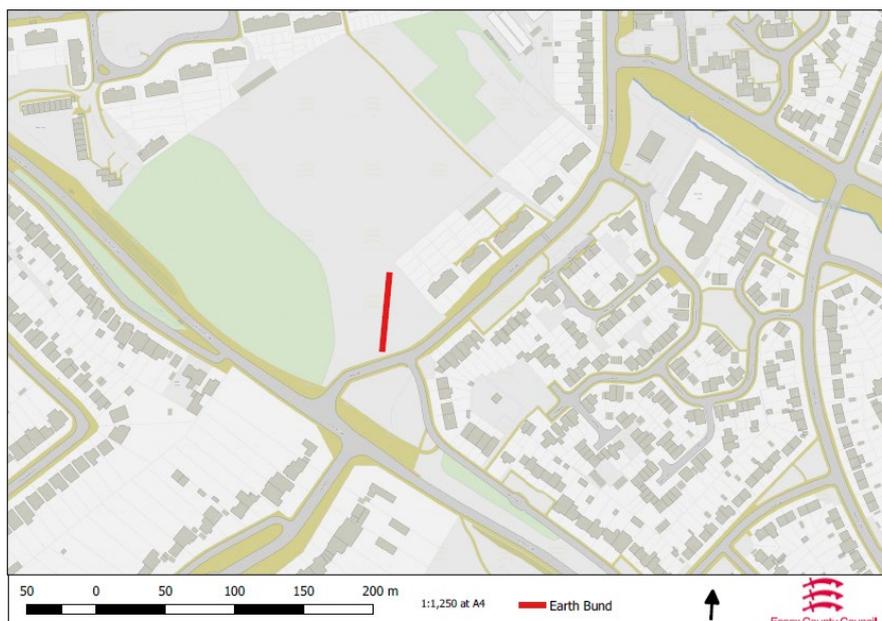
The LFRMS for Essex covers the entire county and has led to the production of more localised investigations into flood risk called Surface Water Management Plans (SWMPs). These investigate risks in more detail, using computational modelling and recorded flood incidents to identify Critical Drainage Areas (CDA's), or smaller sub-catchment at higher risk of flooding. SWMPs have been undertaken across Essex and the resultant CDA's all ranked based on a number of factors, including numbers of properties at risk, to produce a prioritised list for the potential receipt of a flood alleviation scheme, when funding allows. The surface water flood risk for the Hillyfields area can be seen below as found on the Environment Agency's website (<https://flood-warning-information.service.gov.uk/long-term-flood-risk/map?map=Reservoirs>).



In 2015 ECC started a capital programme which aimed to install large scale flood alleviations schemes within Essex in the highest risk CDA areas. The Hillyfields area forms the EPP2 CDA within the Loughton SWMP, and was chosen for further investigation due to the numbers of properties identified as being at risk.

All potential schemes involve the assessment of the CDA catchment as a whole rather than focusing on the specific area of risk, and studies have identified that works at this location would provide a reduction to local flood risk.

As such as we are proposing the creation of a 1.2m high earth bund following the red line on the map below. This will allow water to be stored at times of flood before reaching those at risk, with a controlled flow into the existing drainage network to ensure that the existing system does not become overwhelmed. As with other schemes the storage area will only become wet during times of flood flows, and water will be stored for no more than 48 hours.



The construction of the earth bund requires ECC to seek planning permission and as such we will be submitting an application at the beginning of August. During this process there will be an opportunity for you to meet and discuss the proposals with ECC in more detail through a community engagement event.

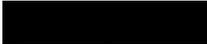
The event will be an informal drop in session held at Loughton Library 4pm until 7pm on Wednesday 29th August 2018.

If you have any questions or would like to discuss the proposals in more detail in the meantime then please do not hesitate to contact me.

Yours faithfully,



Charlotte Smith
Flood Investigation Engineer

Telephone: 
Email: floods@essex.gov.uk
Internet: www.essex.gov.uk/flooding

This page is intentionally left blank

Committee(s)	Dated:
Epping Forest and Commons	14 01 19
Subject: Epping Forest Fires 2018 Update (SEF 5/19)	Public
Report of: Colin Buttery, Director of Open Spaces	For Information
Report author: Martin Newnham - Head Forest Keeper, Epping Forest	

Summary

During the drought of June/July 2013, Epping Forest experienced a series of wildfires, principally across the south of the Forest, at Leyton, Manor and Wanstead Flats. In Autumn 2013, London Fire Brigade, London Borough of Waltham Forest and City Corporation Officers convened a Formal Review Meeting (FRM) regarding the management of wildfires in Epping Forest focusing on learning and improvement points from the existing Epping Forest Fire Habitat Plan. In particular, there was a specific review of a major incident which occurred at Leyton Flats on 19 July 2013 where 135 fire fighters and 16 tenders fought three fires for over 6 hours. A 14-point Wildfire Improvement Plan (WIP) under 4 key headings was agreed to improve the fire incident responsiveness of all Fire Brigade and Epping Forest staff.

This report details progress with the implementation of the 2013 WIP, with reference to the more recent 2018 drought which saw 47 wildfires at various locations across Epping Forest, including a major 4-day incident at Wanstead Flats, described as London's largest ever grassland fire. The progressive implementation of the WIP undoubtedly improved the ability of Epping Forest staff to support the Essex and London Fire Brigades at incidents in 2018. The report also details 6 further learning improvement areas for the division which are being shared throughout the Open Spaces Department and more widely with major London Open Spaces.

Recommendation(s)

Members are asked to:

- Note the report.

Main Report

Background – Summer 2013 Drought

1. Following a series of wild fires during the drought of June/July 2013, principally across the south of the Forest at Leyton, Manor and Wanstead Flats, London Fire Brigade, London Borough of Waltham Forest and City Corporation Officers convened a Formal Review Meeting (FRM) regarding the management of wild

fires in Epping Forest focusing on learning and improvement points from the existing Fire Habitat Plan. In particular, there was a specific review of a major incident which occurred at Leyton Flats on 19 July 2013 where 135 fire fighters and 16 tenders fought three fires for over 6 hours. A 14-point Wildfire Improvement Plan (WIP) (Appendix 1) under 4 key themes was agreed to improve the fire incident responsiveness of all Epping Forest staff.

Current Position – 2018 Summer Drought

2. The Met Office considers the summer of 2018 to be tied with 1976, 2003 and 2006 as the hottest summer on record for the United Kingdom as a whole, with average temperatures of 15.8 °C (60.4 °F). In England, average temperatures for the summer were the highest on record at 17.2 °C (63.0 °F), narrowly ahead of the 17.0 °C (62.6 °F) average in 1976. The high temperatures combined with below average rainfall during May, June and July left much of Epping Forest's grass and heathland in a tinder dry condition.
3. Global warming is a key aspect of climate change. The World Meteorological Office reports that the past four years have been the hottest on record, and the 20 warmest have occurred in the past 22 years. The warming trend is unmistakable and drought planning research suggests that both drought intensity and the spatial extent of droughts in the UK are projected by climate models to increase into the future.
4. Between 15 July and 13 October 2018, a total of 47 wildfires were recorded across Epping Forest. Given the nature of wildfires it is difficult to assess the cause of each individual fire. At some fire locations the large number of cigarette stubs suggests that carelessly discarded cigarettes may have played a role in the development of some fires. Elsewhere disposable barbeques and cooking fires have undoubtedly initiated wildfires, as has some clearly deliberate attempts to start fires. Data collected by the Urban Heaths Partnership (UHP) shows that the majority of heathland wildfires are maliciously started.
5. The City Corporation enjoyed incredible and highly professional support from the Emergency Services, across most of the 47 fires reported. In particular, the London Fire Brigade played a leading role with regard to a 4-day major incident running from Sunday 15 to Wednesday 18 July at Wanstead Flats where 220 firefighters and 40 fire tenders brought under control a fire which has been described as London's largest grassland wildfire.

Current Position

6. This report considers progress with the implementation of the 2013 Epping Forest WIP by reference to the impacts on the effectiveness of the 2018 wildfire response and also notes 6 new learning improvement points which will be considered over the coming months.

Wildlife Improvement Plan 2013

Theme A - Staff training and Awareness

Fire Severity Index Awareness

7. All staff were kept aware by weekly email of the frequent high to very high Fire Severity Index (FSI) scores developed by the Met Office. The significance of the FSI scores were underlined by the use of the Epping Forest Severe Weather Protocol which was designed to support staff working outdoors in heatwave weather with increased sun protection; hydration and provided for additional rest breaks.

Incident Management & Access to Incident Command Centres

8. The Local Authority Liaison Officer (LALO) Training undertaken by 11 key Epping Forest staff during 2016 and 2017, together with a major 2-day Emergency Plan scenario training at Epping Forest in 2016, provided staff with the key skills to operate within the Multi-Agency Gold Incident Command (MAGIC) Control Room environment. Contrary to the previous 2013 major incident, Epping Forest staff were granted full access to the control room and the regular 3-hourly update briefings. Incident Command Meetings led by the Fire Brigade, also involved the Police Service; Transport for London; the 'turn cock' Thames Water representative and Epping Forest staff.
9. Key learning points from the major incident included recognition that the limited range of Epping Forest emergency response duty staff could not rotate at the same 8-hour shift frequency as the emergency services for longer incidents. There were also initial problems on Incident Day 1 (Sunday) regarding access to the necessary skills to map the spread of the fire on City Maps or ArcGIS, together with access to Twitter and the City Corporation website. Epping Forest has identified additional training requirements related to this experience and the need for Gold Command to 'queue' in advance replacement emergency response staff to relieve first responders.

Theme B - Incident Management

Mapping & Numbering/Naming Fire Gates

10. The map-based numbering nomenclature for the 19 fire gates in the zone and the 182 fire gates across the Forest (see Appendix 3) proved useful in helping the emergency services in directing teams through various access points. The physical numbering of gates recommended in 2013 would have been beneficial and temporary numbering for the summer of 2019 will be in place ahead of a more formal scheme which can only be implemented when finances allow.

Map and physically mark (Emergency Vehicle Rendezvous Points - EVRPs)

11. While this work was completed the Fire Brigade responded directly to first-hand reports of the fire and therefore EVRPs were of no value in this particular emergency scenario.

Map positions of all fire hydrants and keep hydrant accesses clear

12. Hydrant provision around Wanstead Flats was limited. LFB Gold Command made an early decision to install a surface mounted ring main structure around Wanstead Flats on the public highway. The ring main also supplied Alexandra Lake which was used as a recharging point for peripatetic appliances that were not linked directly to the ring main.

13. The experience of this incident has encouraged Epping Forest staff to consider the designation of fire ponds at all key grassland and heathland sites which can be filled from hydrant supplementary piping and can ensure tenders have the ability to recharge their water tanks during major incidents.

Joint training exercises with Essex and London Fire Brigades each Spring.

14. Epping Forest staff had trained with the Essex Fire and Rescue Service in May 2018. Training with the London Fire Brigade as per the FRM recommendation had not been possible. Given the impact of the major incident in July joint training commenced in December 2018 and further joint training will take place as an operational priority in Spring 2019.

Enhance Fire Brigade off-road and non-hydrant capability

15. Some 4 number of 1,000 litre Intermediate Bulk Containers (IBCs) were purchased following the 2013 event with the intention of providing static supply facilities. Joint training with the Fire Brigade indicated that an IBC facility mounted on Epping Forest vehicles was more effective. Vehicle-mounted IBCs were widely used throughout the drought period both to resupply fire brigade appliances working away from hydrants and by Forest Keepers to damp down former fire sites.

16. The Fire Brigade pumps loaned to Epping Forest to support IBCs were highly efficient but did not provide water for any substantial period. A 1,000 litre IBC could be emptied within 6 minutes. The simple hose-based recharge facility at The Warren estate yard also provided a lengthy delay to refilling the IBCs. Discussions are underway with Thames Water to look at options for either pumped supplies or releasing hydrants for more rapid refilling of the IBC facilities.

17. A single fire-fogging machine was purchased to help address post-fire damping down. The fire-fogger atomises bowsered water dispersing the liquid as a fine blanket of mist which was more effective in dowsing fires and provided a much longer operational period of 22 minutes/1,000l IBC. Epping Forest will consider purchasing a second fire fogging unit as funds allow.

Access to keys for fire gates

18. 23 additional keys have been provided to London Fire Brigade for all stations and tenders within the Boroughs Redbridge, Newham and Waltham Forest. These also include security fob access to the Aldersbrook Road operational yard for additional access onto Wanstead Flats.

Theme C - Habitat Management

Maintaining wider fire breaks

19. The strength of the burn fanned by light winds and the fire's own internal convection saw the fire 'leaping' 8.8 metre Centre Road and Lakeside Roads. The 6 and 8 metre cut firebreaks that were present did not arrest the spread of the fire. Ironically, it was the presence of short-mown football pitches and highway verges that arrested the eastern and southern progress of the fire.
20. Research by UHP indicates that the incidence of firebreaks stopping fires on their own is rare and they should be viewed instead as helping with overall firefighting measures. Weather is often the deciding factor as to the effectiveness of 'fire breaks', with flames and sparks more than capable of jumping the widest gap, including 6 motorway lanes in strong winds. The risk of side and back burn also increases with erratic weather.
21. The Epping Forest Conservation Team are reviewing the management objectives of heathland with a high fire loading within the Site of Special Scientific Interest (SSSI) with a view to 'de-fuelling' the heathland succession removing some of the more combustible scrub elements from the heathland, such as high gorse, which should reduce the intensity of any future burns.
22. According to research by the UHP, Natural England recommends that 'the most reliable firebreaks are strips of bare ground from which all vegetation has been removed, either mechanically (e.g. rotovated) or by back burning (if appropriate for the site). Semi-permanent breaks can be created through periodic mowing of vegetation to within a few centimetres (2.5cms) of the ground. During drought conditions Epping Forest should consider reinforcing cut firebreaks with continuous rotavated strips which would require Natural England consent. This requirement will have implications for the Epping Forest fleet with the need to substitute heavy duty flail mower collectors with 'batwing' rotary mowers.

Removal of fire 'ladders'

23. Apart from the avenue planting of roadside London Plane there were no significant veteran trees within the main burn site. Younger stands of birch and aspen were directly affected and will be removed as part of the 'de-fuelling' approach discussed earlier.

Extinguishing Sub-soil Fires

24. The same sub-soil fire phenomenon experienced at Leyton Flats in 2013 was again present at Wanstead Flats. Fires continued to burn underground in the gravel subsoil. The phenomenon was clearly identified on thermal imaging cameras from frequent helicopter overflights. Further work is required to understand the dynamics of these burns which could reflect the presence of large quantities of stored carbon; significant air pockets in the gravel pore spaces or mixed gravel deposits that may be rich in 'ancient' carbon.
25. The 'baked' or hardpan character of the surface soil layers also prevented effective fire extinguishment as little hose-borne water was able to infiltrate the soil and was simply deflected away from the fire site. The fire was only contained

on Day 3 (Tuesday) with the help of Epping Forest Contractors who deployed a sub-soiler and power harrow to break the surface soil pan to create an effective firebreak and allow the effective wetting of the soil and subsoil profile effectively limiting the spread of the fire.

26. The experience of a long burning fire at Loughton Camp indicated that the Operation teams also need to review the site protocol for chipping, as an initially extinguished fire continued to burn in wood chippings which has been spread rather than removed from the difficult to access site.

Theme D - Improved Communications

Introduce safety signing during periods of high to very-high fire severity

27. Forest Keepers have experimented with the introduction of temporary signing during hot weather warning about the dangers of using disposable barbeques in relation to wild fires. The use of the temporary signs did not result in any reduction in the number of barbeques detected and extinguished.
28. Wilde's Risk Homeostasis Theory suggests that people evaluate their own levels of personal risk and will take decisions based on the perceived risks and benefits. This rational approach to risk assessment may evaluate the information provided by signing but will not necessarily result in the behavioural changes that the signage seeks. This is particularly the case, where given the size of Epping Forest and the Keeper numbers available, the low likelihood of enforcement action will form part of that risk evaluation.

Use of indirect messaging to accentuate fire risk

29. The 'indirect messaging' suggested by the WIP focused on the provision of fire beaters at car parks and access points to accentuate concerns around jeopardy for the immediate areas.
30. The UHP have recommended the removal of fire beaters from heathland sites, due in part to health and safety concerns and together with practical experiences of their misuse. Beaters may certainly help put out small fires and are useful to those trained in their use for dealing with a situation while they wait for the emergency service. However, they could also tempt members of the public to endanger themselves through the 'heroic' fighting of fires and often, without the right training, the user can actually make things worse by 'fanning' the fire. In some instances, fire beaters have even been used to set fires.
31. An alternative that has happened with many of the local authority managed sites in Dorset is for local residents and volunteers to be provided with fire beaters. These members of the community are trained in their use and advised in what instances they should use them and more importantly when not to use them.

Use of social media to promulgate fires safety message

32. Social media particularly Twitter™ continues to be used through all severe weather events to promote public safety messages. These messages enjoy a high-level of retweeting.

33. In 2017 an arson attack on one of Epping Forest's much-loved veteran oak trees at Warren Pond resulted in record numbers of social media engagement. Epping Forest were quick to report on this within the local community, and this, coupled with quality photographs obtained at the scene, meant that local social media responded very well to the posts on Twitter and Facebook. Two Facebook posts (informing about the incident and an update the following day notifying of the positive outcome that the tree had survived the attack) had a reach of 48,321 people and the two tweets achieved 16,313 impressions – therefore total social media reach achieved was 64,634. Again, this demonstrates the power of social media to engage with extremely large numbers of our visitors quickly.

Additional Learning Points

Communication with key stakeholders

34. Given the initial challenge of responding to the major Incident fire, the early response by the Duty Team and Superintendent to Committee Members and the public was not as effective as it might have been. From Day 2 onwards it was possible to provide more regular updates and this process was expanded to include Members of Parliament and Local Councillors, a number of whom shared the updates verbatim with their constituents through social media.
35. Further consideration is being given to the development of dedicated email groups for geographic sections of Forest; expanding the current 0.6 FTE Communications Officer post and better recognition of the work of the daily Twitter Team who already manage Social Media in addition to their main work roles.

Property Information Box™ (PIBs)

36. A key flaw in the 'grab-bag' first responder scenario, established in the 2013 WIP, was the expectation that first responders would be contacted at home or at the main office where the 'grab-bags' are based. In this instance, both the responders were on duty or away from their place of work and residence and therefore initial access to the grab-bag was limited, especially given the immediate build-up of traffic around the major incident site.
37. The London Fire Brigade has recommended the use of Premises Information Boxes™ (PIBs) which would be located on six initial key sites. Pillar box red PIBs are prominent high security specification 'cupboards' providing security for key information that will support a major incident response. Designed to be weather resistant for external locations, the PIB provides a recognised focal point for attending fire crews without the reliance on power or LALOs being present.

Pollution Plume Monitoring

38. The Wanstead Flats Fire resulted a significant smoke plume that was discernible across East and South London. U.S. Research on possible smoke-related pollution events indicate that wildfires can generate adverse levels of particles smaller than 2.5 microns in diameter (less than one-quarter of the width of a human hair). These 'gritty' particles are small enough to get into a person's lungs. In heavy-enough concentrations, they can cause damage. The US Environmental Protection Agency (EPA) estimates biomass burning contributes

more than 25 percent of all small particle pollution (identified by the EPA as PM2.5) in the U.S.

39. Research teams have found that during the summer -- when the level of smoke coverage across the US. peaks -- about 52 percent of all PM2.5 air pollution events in the continental U.S. occur when smoke from forest fires is present. Wildfires are usually short-lived events in the UK and are not as significant as the U.S. experience, however, the need to monitor significant incident smoke plumes needs to be properly considered.
40. Epping Forest will explore closer links with the Health Protection Agency; Public Health England; Environment Agency and the Health & Safety Executive and Local Authorities to better understand who the competent authority for monitoring pollution in such situations and how public safety information on low level pollution is best communicated to the public.

'Defendable Structures' Assessment

41. Given the continuous nature of Epping Forest with a range of 'high value' urban structures, such railways; residential properties; power sub-stations; pumping stations; telecommunications masts further work is required to ensure that these facilities are properly assessed and clearly communicated as risks to MAGIC Gold Commanders. The Fire Brigades define such items as 'Defendable Structures' (DS) and as such these facilities will now be mapped and added to the hydrant and fire gate mapping available to First responders.

Mapping availability

42. MAGIC Gold Command Centres are now internet enabled which makes sharing digital information far more efficient. This Autumn Epping Forest staff have transferred key Epping Forest Geographic Information System (GIS) mapping layers to the London Fire Brigade's GIS facility. Epping Forest GIS layers on fire gates; hydrant locations, habitat types and other key information can now be readily accessed by the Command Centre.

Firebreaks for Residential properties

43. Traditionally vegetation tends to be thicker and higher around the edge of sites, as it is often left as a screen between residences and the site. Residents often object to attempts to reduce this screening vegetation which is perceived as an aid to both property security and personal privacy. During 2018, a number of isolated residences sought reassurance from the City Corporation that vegetation close to their properties would be properly managed.
44. If properties are located behind thick screening, this can impede access to Fire Service teams bringing the risk of fire much closer to homes and people and ultimately making retention unacceptable under any fire risk assessment. Epping Forest will need to initiate and review Fire Risk assessments for adjoining properties. The UHP recommends that if management work is deemed necessary to reduce the risk it is worth informing residents of this with the help of the fire service, as they may be more accepting of the loss of a perceived security and privacy measure if they realise it will reduce the risk of fire damage to their property

Corporate & Strategic Implications

45. The protection of Epping Forest from wildfire supports the Corporate Plan 2018-2023 objective of:

Shape outstanding environments

- We are digitally and physically well-connected and responsive
- We have clear air, land and water and a thriving sustainable natural environment
- Our spaces are secure, resilient and well-maintained.

Open Spaces Department Business Plan 2016-19

46. The protection of Epping Forest from wildfire also supports the Open Spaces Business Plan objective:

46.1 Our spaces are secure, resilient and well-maintained: b) Build resilience to natural and man-made threats by strengthening, protecting and adapting our infrastructure, directly and by influencing others.

46.2 Open spaces and historic sites are thriving and accessible: 2) London has clean air and mitigates flood risk and climate change.

Implications

47. **Legal:** Byelaw(3)(6) clearly prohibits the '*Making or starting in the Forest any bonfire or other fire of any substance ...*'

48. **Financial:** In addition to the considerable draw on staff time during the summer of 2018, the cost of the fires has had a significant impact on the 2018/19 Epping Forest Local Risk budget with the cost of additional equipment; employment of contractors and the restoration work at the Wanstead Flats Site of Special Interest amounting to £25,600.

Health Implications

49. The 3 days fire produced a substantial plume of smoke which could be seen across East London.

Conclusion

50. The implementation of the 2013 Epping Forest Wildfire Improvement Plan through a mix of improved staff information and training; expanded mapping; additional equipment and improved communication has enhanced the ability of the Fire Brigade and Epping Forest Teams to manage a significant number of wildfires across Epping Forest.

51. Six further improvement learning points have been identified through the 2018 wildfire events and this learning will be integrated within the wider WIP learning and shared across the Department. Climate change appears to be driving the frequency of drought events and therefore greater attention and investment will be necessary to manage the increasing likelihood of major fire events within the Forest.

Appendices

- Appendix 1 – Summary of Epping Forest Wildfire Improvement Plan 2013
- Appendix 2 - 2018 Epping Forest Fire Log (15.07-13.10)
- Appendix 3 – Epping Forest Fire Gate Locations

Background documents

Rahiz, M. and New, M. (2013) 21st Century drought scenarios for the UK. *Water Resources Management*, 27(4): 1039-1061.

Aaron S. Kaulfus, Udaysankar Nair, Daniel Jaffe, Sundar A. Christopher, Scott Goodrick. **Biomass Burning Smoke Climatology of the United States: Implications for Particulate Matter Air Quality.** *Environmental Science & Technology*, 2017; 51 (20): 11731 DOI: [10.1021/acs.est.7b03292](https://doi.org/10.1021/acs.est.7b03292)

Urban Heaths Partnership. 'Fighting Fires with LIFE' (2009) A Best Practice guide for Fire Risk Assessment and Management

Martin Newnham

T: 020 7332 5310

E: martin.newnham@cityoflondon.gov.uk

Appendix 1

Summary & Actions - Epping Forest Wildfire Improvement Plan 2013

Theme A – 1. Staff Information, Training and Awareness

1. Fire Severity Rating/Index Awareness

The Met Office maintains a Fire Severity Index (FSI), <https://www.metoffice.gov.uk/public/weather/fire-severity-index/#> which is an assessment of how severe a fire could become if one were to start. It is not an assessment of the risk of wildfires occurring. The FSI shows the current day's fire severity and a forecast of likely fire severity over the coming five days. The index values are from 1 to 5, which represents an increasing degree of fire severity as follows:

- FSI level 1 = low fire severity
- FSI level 2 = moderate fire severity
- FSI level 3 = high fire severity
- FSI level 4 = very high fire severity
- FSI level 5 = exceptional fire severity

In 2013, in line with the then **Fire Habitat Plan** operational awareness of both weather warnings and the FSI was limited to a small number of Senior Managers and general messages regarding FSI were not distributed more widely to staff or the public.

ACTION A.1	Staff Awareness - Complete All Epping Forest staff are now updated on a weekly basis regarding the FSI Index for the week ahead.
	Public Awareness - Complete The Epping Forest social media Twitter team also Tweet regular public safety messages about fire awareness to 6,843 followers (as of 12.2018).

2. Access to Incident Command Centres

Multi-Agency Gold Incident Command (MAGIC) is a mechanism created for strategic level participants from multiple agencies to fully co-operate under a single command during major incidents. MAGIC meets the Civil Contingencies Act 2004 (Contingency Planning) Regulations (2005) for the managing Category 1 and 2 Responder staff with a role in major incidents.

In 2013, there was a single MAGIC incident on 19th July 2013 where three separate fires had been deliberately set at Leyton Flats. Despite having trained beforehand with the London Fire Brigade Waltham Forest team in the Spring of 2013, the Waltham Forest Commander and Sub-Commander were not available on the day of the fire and command was assumed by the Newham Sub-commander who was unfamiliar with the nature of Epping Forest. City Corporation staff were not initially permitted access to the Command Centre which prevented the early exchange of critical information.

ACTION A.2	<p>Access to Incident Command Centres - Complete 11 key Epping Forest staff were trained as Local Authority Liaison Officers (LALOs) which provides access to Incident Command Centres. LALO training commenced in June 2014, followed by November 2016 at the London Fire brigade HQ and was refreshed in Autumn 2018.</p>
	<p>Incident Scenario Training - Complete Epping Forest LALO staff participated with Local Authority LALOS in 2-day mock scenario exercise with Blue Light Services supplemented with Army and RAF Trainers.</p>

Theme B - Incident Management

3. Mapping & Numbering/Naming Fire Gates

In drawing together 16 fire tenders to fight a major incident fire, MAGIC Fire Brigade Commanders rely on calling engines from a range of fire stations in London. At the height of the fire tenders from as far afield as Brixton and Richmond were in attendance. Consequently, some fire crews had an extremely limited knowledge of the immediate area which hampered the ability to deploy effectively. Crews found that there was a lack of mapping and local orienteering locations such as named gates and entrances that could help Commanders effectively coordinate activity.

ACTION B.3	<p>Mapping & Numbering of all Epping Forest Fire Gates - Complete The Epping Forest Safety and Assets team have now mapped all the Epping Forest fire gates, numbering each gate consecutively. This mapping is maintained within the Epping Forest GIS system and remains accessible to Epping Forest Gold Commanders.</p>
	<p>Hard Copy Mapping Availability – Complete Digital-print mapping of fire gate locations is also available in ‘grab-bags’ for all Epping Forest first responders to carry to an incident site.</p>
	<p>Physical Signing of Gates – To be completed Work to physically signal Epping Forest fire gates is yet to be undertaken on cost grounds. Work is being combined with corporate branding imagery and the opportunity to add key messages regarding the byelaws.</p>

4. Map and physically mark Emergency Vehicle Rendezvous Points (EVRPs)

EVRPs enable Callout Duty Managers and Forest Keepers to rendezvous with Emergency Service vehicles at key Forest car parks to enable Epping Forest vehicles to lead the emergency services vehicles to isolated incidents. While fires can normally be easily visibly located by emergency vehicles, vehicle access points can be less obvious. Similarly, for incidents such as medical emergencies expert local knowledge can allow EVRPs to help shorten response times.

ACTION B.4	<p>Designation of EVRP and Air Ambulance Landing sites - Complete Both EVRP and Air Ambulance Landing sites have been designated across Epping Forest and have been shared with the emergency services. Digital print mapping is again available in Emergency Responder grab-bags.</p>
	<p>Hard Copy Mapping Availability – Complete Digital-print mapping of EVRP and Air ambulance Landing Sites locations is also available in ‘grab-bags’ for all Epping Forest first responders to carry to an incident site.</p>
	<p>Heli-handler Ground Crew Training – Partially Complete One LALO Officer has been Heli-Handler trained. (Overlap with London Hyperbaric Facility Risk Assessment).</p>
	<p>Physical Signing of EVRPs – To be completed The forthcoming Epping Forest car park review will include proposals to physically mark prominent EVRPs within car parks.</p>

5. Map positions of all fire hydrants and keep hydrant accesses clear

The Fire Brigade inspects Fire Hydrants locations every 4 years, remarking fire hydrants and making maintenance recommendations. Fire Brigades manage information regarding fire hydrant locations through a GIS-based system which is not publicly accessible due to security concerns.

Given the complex character of the Forest, the WIP recommended that Epping Forest manages its own fire hydrant map and integrates the maintenance of surrounding vegetation into annual work plans to ensure that hydrants remain accessible and easy to locate.

ACTION B.5	<p>Mapping of all Fire Hydrant Sites sites - Complete All Epping Forest hydrants are now mapped on a GIS layer within the Forest GIS system which is accessible to Gold Commanders.</p>
	<p>Hard Copy Mapping Availability – Complete Digital print maps of hydrant locations have again been included within emergency response ‘grab-bags’ for first responders.</p>
	<p>Hydrant Locations part of regular vegetation management programme - Complete</p>

	Hydrant locations are kept clear as part of the Conservation Mowing Programme
--	---

6. Enhance Fire Brigade off-road and non-hydrant capability

The main London Fire Brigade Mercedes-Benz Atego appliances have a 1,365-litre water storage capacity. With on-board pumps capable of pumping 3,910 litres/min the proximity of fire hydrants or alternative water sources is therefore critical to a continuing and effective fire-fighting response. In some off-road circumstances away from fire hydrants the firefighting response was clearly limited. At the Leyton Flats major incident, the large fire appliances were forced to refill from the already low Hollow Ponds despite its Site of Special Scientific Interest (SSSI) status.

ACTION B.6	Purchase Intermediate Bulk Containers - Complete 4 x 1,000 litre caged Intermediate Bulk Containers (IBCs) which could be stored at key fire locations. However, based on immediate experience the translucent IBCs were prone to water contamination and vandalism and were alternatively mounted on Toyota Hi-Lux and Ford Ranger pick-ups to help directly resupply fire appliances fighting fires away from hydrants locations.
	IBC pumping facility – Complete The Fire Brigade has loaned high pressure pumps to allow the rapid deployment of the contents of the IBCs.

7. Joint training exercises with Essex and London Fire Brigades each Spring. The WIP recommending building on existing joint training exercises.

ACTION B.7	Joint Training Exercises Undertaken - Complete Training exercises undertaken subject to Brigade resources.
-------------------	--

8. Access to keys for fire gates

All local emergency services are supplied with Epping Forest specialist Kaba keys for fire gate locks. In situations where fire appliances are being drawn from further afield, Epping Forest incident responders need to be able to issue additional keys and/or guarantee that fire gates can be locked open.

ACTION B.8	Reissue of EF Fire gate keys to all local Fire Crews - Complete Epping Forest keys were recirculated to fire stations following the move to high-security fire gates at Epping Forest. First responders also have a supply of keys to issue at incidents.
	EF LALO Staff to hold additional fire gate keys - Complete First responders also have grab bag supplies of keys to issue at incidents.

Theme C - Habitat Management

9. Maintaining wider fire breaks

The experience at both Wanstead and Leyton Flats was that wildfires had easily traversed or 'leapt' the 3.5 metre fire breaks and that wider fire breaks should be cut in future.

ACTION C.9	Firebreak Mapping - Complete Across the winter of 2013 an extensive mapping operation was undertaken to identify a grid of firebreaks which could be cut to a wider 8 or 10 metre specification.
	Natural England Consent for firebreak cutting - Complete Consent provided.
	Cutting of Firebreaks - Complete The cutting of these firebreaks commenced in 2014, however, the narrow Epping Forest Flail Mower Collectors used to manage conservation mowing proved to be laborious in cutting consistently wide firebreaks.

10. Reducing the risk of crown fires by the removal of fire 'ladders'

One of the most spectacular and damaging elements of the fires, as well as the most damaging, was the outbreak of crown fires in the canopy of large older trees. Flames had lifted into the canopy along chains of gorse and young trees that typically formed copses in association with older trees. While representing valuable conservation habitat the Fire Brigade advised that these 'fire ladders' should be eliminated by removing young trees and older shrubs associated with the veteran trees.

ACTION C.10	Fire Ladder removal - Complete Extensive work has been undertaken at Leyton and Wanstead Flats to remove stands of gorse and bracken understory and young trees close to older larger trees to combat the 'fire ladder' effect. Unfortunately, subsequent works to remove vegetation during the winter of 2017 received significant criticism from local conservation groups regarding the loss of valuable habitat for migrating birds.
--------------------	---

11. Extinguishing Sub-soil Fires

Fire crews were surprised by the ability of the of the thin grassland soils on river gravel terraces to continue to burn for long periods together with their ability to resist extinguishment. Some experienced firefighters likened the grassland fires to persistent peatland fires.

ACTION C.11	<p>Sub-soil Fires - Complete Incident ‘grab-bags’ now include drift geology maps to help inform Incident Commanders regarding underlying soil conditions.</p>
	<p>Understanding Sub-soil Fires – Incomplete Despite extensive research there is currently no adequate explanation for the sustained burns associated with gravel terraces.</p>

Theme D - Improved Communications

12. Introduce safety signing during periods of high to very-high fire severity

The FMR encouraged the City Corporation to consider the erection of further safety messaging during periods of heightened fire risk to help visitors understand key risks such as discarding lit cigarettes and using disposable barbeques.

ACTION D.12	<p>Temporary Signing Trials - Complete The Epping Forest Keeper Service had been experimenting with temporary A-Board signage to discourage the use of disposable barbeques and the WIP recommended that this work should continue. Sadly, the boards had no discernible impact on public behaviour with no substantial change in the number of advisory conversations undertaken before or after the use of the A-boards. The regular theft of the temporary A-Boards has also restricted this practice.</p>
	<p>Understanding Sub-soil Fires – Incomplete Despite extensive research there is currently no adequate explanation for the sustained burns associated with gravel terraces.</p>

The failure of signing to work in certain circumstances is thought to be related to Wilde’s **Risk Homeostasis Theory** where individuals behave according to their own assessments of risk, and therefore if they perceive a risk to be low, they will take the additional risk and enjoy what they consider to be the benefit.

13. Use of indirect messaging to accentuate fire risk

Based on their experience of community outreach campaigns on hoax calls and fire detectors Fire Brigade Officers encouraged Epping Forest staff to use indirect and subtle messaging to influence public behaviour. Reference was made to practice on National Park grouse moors of storing fire beaters at car parks during High Risk Fire Severity Index to underline concerns.

ACTION D.13	<p>Storing fire beaters at access sites – Not completed This proposal was not considered realistic in an urban environment.</p>
--------------------	--

Use of social media to promulgate fires safety messages

14. The WIP recommended the expansion of the use of Social media, particularly Twitter, which by 2012 had 100 million users posting 319 million tweets a day. Social media could be used to reach regular Epping Forest users with key messages around fire risks.

ACTION D.14	Storing fire beaters at access sites – Complete The Epping Forest social media Twitter team also Tweets regular public safety messages about fire awareness to 6,843 followers (as of 12.2018). [See also A.1}
--------------------	--

This page is intentionally left blank

Appendix 2 Fire Log as from 15 July 2018

Number	Date	Time (24HR)	Location	Land Status	Type of Fire (Smouldering/Flames)	Size	Action Taken
1	15.07.2018	16:00	Wanstead Flats, Leyton Flats	SSSI, SAC, NE,	Flames/Flames	Large	Fire Brigade on site (40+ engines) + Met Police
2	15.07.2018	9:22	Oak Hill		Smouldering		Fire Brigade called by member of public
3	15.07.2018	15:47	Loughton Camp	NE	Smouldering	Medium	Fire Brigade called by member of public
4	16.07.2018	12.4	Long Running	SSSI, SAC, NE,	Smouldering	Medium	Fire Brigade called by member of public 2 Appliances attended
5	18.07.2018	14:00	Woodford Golf Course		Fire/Flames	Medium	Fire Brigade in attendance called by Staff at Course
6	18.07.2018	14:48	Lake House Road		Fire/Flames	Not Known	Fire Brigade in attendance
7	19.07.2018		Adjacent to Aldersbrook stables on entrance to Exchange Land		Fire	Not Known	Fire Brigade in attendance - Arson
8	19.07.2018		Exchange Land, Wanstead Park - Fire set alight on verge (cycle track)		Fire	Small	Fire Brigade in attendance - Arson
9	19.07.2018		Exchange Land Wanstead Park fenced boundary with Thames Water Pumping Station		Fire	0.25 acre grass fire	Fire Brigade in attendance - Arson (multiple ignition sites)
10	19.07.2018		Exchange Land at Wanstead Park, fenced boundary with LBN/LBR Allotment Site		Fire	0.5 acre grass fire	Fire Brigade in attendance - Arson
11	19.07.2018		Exchange Land Wanstead Park, Land adjacent to Thames Water Paddocks		Fire	small	Fire Brigade in attendance
12	20.07.2018		Empress Avenue/Allotments exchange land entrance		Manure Head fire	Not Known	Firebrigade in attendance
13	17.07.2018	19:15	Below Loughton Camp/Debden Slade	SSSI, SAC, NE,	Smouldering	Large	Fire Brigade in attendance
14	20.07.2018	16:31	Leyton Flats nr Eagle Pond		grass fire	Not Known	Fire Brigade in attendance
15	21.07.2018	13:30	Loughton Camp		Smouldering/flames	Not Known	Fire Brigade in attendance
16	23.07.2018	10:00	Rushey Plain - Turn around, High Beach		Smouldering - Smells strong of smoke in a	Not Known	Forest Keepers have searched and cannot locate ground
17	23.07.2018	9:00	Bury Wood		smouldering fire	Not Known	MW & Fire Brigade in attendance
18	23.07.2018	16:15	Loughton Camp (Bottom)		Smouldering	Not Known	Extinguished by Forest Keeper
19	23.07.2018	20:37	Eagle Pond/Leyton Flats		Fire/Flames	Not Known	Extinguished by Forest Keeper
20	23.07.2018	16:50	Bush Wood		Fire Flames	Not Known	Extinguished by Forest Keeper
21	24.07.2018	13:15	Rushey Plain - Turn around - Mattress		Smouldering/Fire	Not Known	Extinguished by Forest Keeper
22	24.07.2018	11:25	Off of Green Man PH roundabout fire site		Smouldering	Not Known	Extinguished by Forest Keeper
23	24.07.2018	13:15	Rushey Plain - Turn around - 100 yards from Ride		Smouldering	Medium	Extinguished by Forest Keeper
24	25.07.2018	12:33	Fairmead Road after Hill Wood (2 Fires)		Smouldering	Small	Firebrigade in attendance - Extinguished
25	26.07.2018	11:00	Bushwood North old fire site		Smouldering	Small	Extinguished by Forest Keeper
26	26.07.2018	10.5	Leyton Flats old fire site		Smouldering	Small	Firebrigade in attendance - Extinguished
27	26.07.2018	10.4	Loughton Camp		caller reported smell of fire but no actual f	Not Known	Forest Keeper - visited site
28	26.07.2018	19:28	Half way up Hornbeam Lane, behind horse track, across narrow track		Smouldering	Not Known	Extinguished by Mick Collins
29	27.07.2018	10:40	Hornbeam Lane (off Bury Road)		Smouldering	Medium	Fire Brigade called - update (Not needed)
30	27.07.2018	11:30	Loughton Camp		caller reported smell of fire but no actual f	medium 5 smouldering	Extinguished by Forest Keeper
31	27.07.2018	14:12	Woodcote Road/Blake Hall Road		Flames	Not Known	Fire brigade on site and A10
32	27.07.2018	16:42	Loughton Camp - West side		Flames	small smouldering	Fire brigade called by member of public
33	28.07.2018	16:44	Wanstead Flats, Bush Road side, one third of the way from road to open space		Smouldering	Not Known	Fire brigade in attendance
34	28.07.2018	Not known	Lost Pond		Fire	Camp Fire - Small	Extinguished by Forest Keeper
35	28.07.2018	Not Known	Rushey Plain		Fire (Was a BBQ then turned into Bonfire)	Large	Fire Brigade in attendance
36	30.07.2018	11:30	Wanstead Flats - Enter via Centre Road Car Park		Flames	Medium	Fire Brigade in attendance
37	01.08.2018	9:00	Bridle Path from Bury Road		Smouldering underground	Not Known	Extinguished by Forest Keeper
38	01.08.2018	14:20	Bushwood		Smouldering did not find- fire brigade atte	Small	Fire brigade in attendance
39	02.08.2018	11:22	Quakers Meeting House by Green Man PH roundabout and Keepers lodge		Smouldering	Not Known	Fire Brigade in attendance
40	04.08.2018	17:06	Rear of Bush Wood		Smouldering Fire	Medium	Fire Brigade in attendance
41	06.08.2018	19:00	Picnic Table Butlers Retreat, Chingford		Fire	Small	Extinguished by Forest Keeper
42	15.08.2018	12.1	Black Barn area		Smoke	lots of smoke	Extinguished by Forest Keeper
43	10.09.2018	19:38	Wanstead Flats - Up from Changing Rooms		Smouldering	Small	Extinguished by Forest Keeper
44	16.09.2018	10:16	Strawberry Pond		Smouldering	Not Known	Extinguished by Forest Keeper
45	17.09.2018	13:30	Pillar mounds		smouldering	Not Known	Extinguished by Forest Keeper
46	12.10.2018	9:00	Burry Wood		Smouldering	small	Extinguished by Forest Keeper
47	13.10.2018	12:32	Perch Pond opposite side of Riding School		Smouldering	small	Fire Brigade called

This page is intentionally left blank

APPENDIX 3			
GATE NO	COMPARTMENT NO	LOCATION	TYPE
N3	1	Epping Green	Metal hinged
N2	1	Gibbons Bush Epping Long Green	Metal hinged
N1	1	Rye Hill Epping Long Green	Metal hinged
N5	2	Puck Lane	Metal hinged
N4	2	Claygate Lane	Metal hinged
N10	3	Wood Yard gate	Metal hinged
N6	3	Forest Side Lower Forest	Metal hinged
N8	3	Coopersale Common	Metal five bar
N11	3	Opposite St Margarets The Plain	Metal hinged
N9	3	Stump Road Coopersale	Metal hinged
N7	3	North Weald Road Lower Forest	Metal hinged
N13	4	Sergeants Green	Metal hinged
N14	4	Woodgreen Farm Lane	Metal 5 bar
N16	4	Giffords Wood main gate	Metal Hduty hindged
N12	4	Long Street Hazel Smalls	Wood suffolk 5 bar
N17	4	Giffords Wood inner gate	Wood 5 bar
N18	4	Giffords Tree gate	Wood 8 bar
N15	4	Woodgreen Farm Lane side	Metal 5 bar
N19	5	Forest Side car park Theydon	Metal hinged
N20	5	Cricket Club 1	Metal hinged
N21	5	Cricket Club 2	Metal hinged
N23	6	Woodyard St Thomas's	Metal hinged
N25	6	Lodge Road car park	Height barrier
N22	6	St Thomas Epping Road Cross	Metal hinged
N24	6	Lodge Road car park	Metal hinged
N27	7	Long Running car park	Metal hinged
N28	7	Coppice Row	Metal hinged
N26	7	Theydon loop crossing Epping Road	Metal hinged
N31	8	Pick Hill car park	Metal hinged
N29	8	Genesis Slade car park	Metal hinged
N32	8	Theydon Green Coppice Row	Metal hinged
N30	8	Theydon Green Pick Hill	Metal hinged
N34	9	Verderers Ride / Woodredon Hill	Metal hinged
N33	9	Verderers Ride / Claypitt Hill	Metal hinged
N36	9	Bottom Riffle Butts	Metal hinged
N35	9	Honey Lane car park	Metal hinged
N39	10	Wake Valley car park	Small metal
N40	10	Wake Valley car park	Height barrier
N37	10	Wake Valley car park	Metal hinged
N42	10	Rushy Plain car park	Metal hinged
N41	10	Epping New Road / Wake Arms	Wooden 5 bar
N38	10	Wake Valley car park	Wooden 5 bar
N43	11	Horse Ride opposite Broadstrood	Metal hinged
N44	11	Deer Shelter Plain	Metal hinged
N46	12	Broadstrood car park	Metal hinged
N45	12	Debden Lane	Metal hinged
N49	13	Barking Dogs Ride	Metal hinged
N47	13	Ditches car park	Counter weight barrier
N50	13	Goldings Hill Lodges	Metal barrier
N48	13	Loughton Lane	Metal hinged
N52	14	Wellington Pub	Metal hinged
N53	14	Queens Green	Metal heavy duty hinged
N51	14	Claypitt car park	Metal hinged

GATE NO	COMPARTMENT NO	LOCATION	TYPE
N54	14	Generals Ride / Karls Tea Hut	Metal hinged
N57	15	Opposite Kemp's Lawn	Wooden 5 bar
N56	15	Warren Plantation	Metal hinged
N55	15	Field Crown Hill	Metal hinged
N59	16	Baldwins / Keepers Lodge	Metal hinged
N58	16	Top of Baldwins Hill	Metal hinged
C10	17	Green Lane off of Bury Rd	Single metal
C9	17	Mott Street - gate at top of hill entrance to horse fields	Single metal
C8	17	Mott Street - gate into Fernhills	Single metal
C8A	17	Mott Street - gate into Fernhills	Wooden fivebar gate
C7	17	Mott Street - on bend next to Trueloves	5 bar metal gate
C3	18	Ride to High Beach from Epping New Rd - cattle gate	wooden 5 bar
C13	18	Cross Roads, Ups & Downs entrance	Single metal
C4	18	Pauls Nursery Rd near Garden House	Single metal - counter weight
C1	18	Pauls Nursery Rd/Manor Rd Junction - entrance to Ups & Downs Ride	Single metal
C2	18	Epping New Rd - opposite Mt. Pleasant	Single metal
C16	20	Shaftesbury - EA access gate Staples Pond	Single metal - custom made
C5	20	Clay Ride - Baldwins Hill	Single metal
C15	20	Earls Path, Green Ride North gate	Single metal - counter weight
C20	21	Fairmead Oak - car park entrance gate	5 bar metal gate
C21	21	Fairmead Oak - entrance to Fairmead Oak Plain	Single metal
C14	21	Cross Roads, Hill Wood Ride entrance	Single metal
C11	21	Top of Church Road, High Beach	Single metal
C12	21	Church Rd, High Beach. Opposite Sun Trap	Single metal
C19	21	Fairmead Rd - Essex council gate	Single metal - Essex Highways
C22	22	Lincolns Lane (Fairmead side) of Epping New Rd (West)	5 bar wooden
C18	22	Catacombs Corner	Single metal
C73	23	Nursery Road	5 bar wooden
C23	23	Lincolns Lane (Stubbles side) of Epping New Rd (East)	Single metal
C17	23	Earls Path - Green Ride South	Single metal - counter weight
C24	23	Warren Hill (exit from stubbles)	Single metal
C41	25	Bury Rd - ride up side Chingford Golf Course	Single metal
C27	25	Woodmans Ride entrance off of Bury Rd	Single metal
C29	25	Hawksmouth entrance	Single metal
C26	25	Gilwell Lane	Single metal
C28	26	Bury Rd - Jubilee Ride	Single metal - counter weight
C33	26	Bury Rd - old car park entrance	Single metal - custom made
C37	26	Bury Rd - gate from new car park into fairground site	Single metal
C38	26	Bury Rd - gate from new car park into fairground site	Single metal
C43	26	Rangers Rd - Green ride North	Single metal
C42	26	Rangers Rd - Butlers Retreat	Single metal
C36	26	Bury Rd - fairground site onto Plain	Single metal - custom made
C39	26	Bury Rd - main car park gates	Double metal gates - custom
C34	26	Bury Rd - old car park entrance to plain	Single metal
C40	26	Bury Rd - Caddy house car park	Single metal

GATE NO	COMPARTMENT NO	LOCATION	TYPE
C35	26	Bury Rd - gate into Fair Ground site	Single metal - custom made
C25	28	Warren Hill (exit Warren Hill)	Single metal
C31	28	Avenue Gate - Entrance to North Farm	Single metal
C32	28	Manor Rd - Powells Forest North	Single metal
C30	28	Manor Rd - Warren Hill South	Single metal
C50	28	Buckhurst Hill cricket club - Powells Forest	Single metal
C52	29	Brook Rd - The Birkbeck	Single metal
C45	29	Warren Pond Rd - gate down to Pond	Single metal
C44	29	Barn Hoppit - car to extension	Single metal
C49	29	Epping New Rd - Warren Wood pub, Warren Wood Slope	Wooden 5 bar
C51	29	Brook Rd - Whitehall Plain	Single metal
C46	29	Connaught Club - car park	Single metal
C48	29	Rangers Rd - Green ride south	Single metal
C47	29	Warren Pond Rd - southern entrance	Single metal
C62	30	Colvin gardens - Organ Lane	Single metal
C61	30	Endlebury Rd - Organ Lane	Single metal
C66	30	Sunset Avenue - Woodford Golf Course	Single metal
C60	30	Endlebury Rd - Mays Lane	Single metal
C64	30	Mornington Rd - Entrance to Golf Course	Single metal
C59	30	Larkshall Rd - Mays Lane	Single metal
C63	30	New Rd, Chingford - Larks Wood	Single metal
C67	30	Sunset Avenue - Woodford Golf Course Car park	Single metal
C65	30	Mornington Rd - Entrance to Wayleave	Single metal
C58	31	Monkhams Lane, Buckhurst Hill	Single metal
C53	31	Knighton Lane	Single metal custom
C54	31	Knighton Lane	Single metal
C55	32	Knighton Lane - Squirrel path	Single metal
C56	32	Kings Place, Buckhurst Hill - Lords Bushes	Single metal
C57	32	Forest Side, Buckhurst Hill - Lords Bushes	Single metal
C68	33	Woodford High Road - Doctors surgery	Single metal
C70	33	Highams Park - gate onto dam	Single metal
C72	33	Oak Hill - Entrance next to Oak Hill Pond	Single metal
C71	33	Oak Hill - North side just before Bridleway	Single metal
C69	33	Woodford High Road - Woodford Cricket Pitch	Single metal
S3	34	Mill Plain	Single
S2	34	Oak Hill East	Single
S1	34	Oak Hill West	Single
S6	35	Forest School	Single
S7	35	Gilbert's Slade CP North	Single
S9	35	Snaresbrook North	Single
S8	35	Gilbert's Slade CP South	Single
S5	35	Rising Sun	Single
S4	35	Allotments	Single
S16	36	Whipps X Road North	Single
S20	36	Green Man Roundabout	Single
S19	36	Hollybush Hill	Single
S12	36	Eagle Pond	Single
S15	36	Lakehouse CP Rear	Single
S18	36	Forest Glade	Single
S14	36	Lakehouse CP Entrance	Single
S10	36	Lido	Double

GATE NO	COMPARTMENT NO	LOCATION	TYPE
S13	36	Boathouse	Single
S17	36	Whipps X Road South	Single
S11	36	Snaresbrook CP	Double
S29	37	Exchange Lands	Single
S25	37	Warren Road South	Single
S28	37	Perch Pond	Single
S21	37	Warren Road North	Double
S22	37	Temple Access Drive	Double
S23	37	The Glade	Single
S26	37	Woodlands Avenue	Single
S24	37	Temple	Single
S27	37	Northumberland Avenue	Single
S34	38	Harrow Road Pavillion	Single
S33	38	Ferndale Road	Single
S49	38	Manor Park Triangle	Single
S31	38	Bush Wood South	Single
S35	38	Harrow Road Playing Fields South	Single
S46	38	Capel Road Playing Fields	Single
S45	38	Capel Road Changing Rooms	Single
S38	38	Jubilee Pond CP Entrance	Double
S47	38	Alexandra Lake CP Entrance	Double
S32	38	Mornington Road	Single
S37	38	Belgrave Road	Single
S44	38	Centre Road CP Rear	Single
S42	38	Centre Road CP Entrance	Double
S40	38	Fairground Site	Double
S39	38	Jubilee Pond CP Rear	Single
S36	38	Harrow Road Playing Fields East	Single
S48	38	Alexandra Lake CP Rear	Single
S41	38	Centre Road North	Single
S43	38	Centre Road CP Flying Club	Single
S30	38	Bush Wood North	Single
C6	61	Mott Street - entrance gate to compartment 61	Single metal

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank