



Epping Forest & Commons Committee

Date: MONDAY, 7 SEPTEMBER 2020
Time: 11.30 am
Venue: VIRTUAL PUBLIC MEETING (ACCESSIBLE REMOTELY)

Members:

Graeme Doshi-Smith
Deputy Philip Woodhouse
Peter Bennett
Caroline Haines
Alderman Robert Howard
Alderman Robert Hughes-Penney
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 Paul Morris
Verderer Nicholas Munday
Verderer H.H William Kennedy

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

Accessing the virtual public meeting

Members of the public can observe the virtual public meeting at the below link:

<https://youtu.be/G4CC3S2RXbA>

This meeting will be a virtual meeting and therefore will not take place in a physical location following regulations made under Section 78 of the Coronavirus Act 2020. A recording of the public meeting will be available via the above link following the end of the public meeting for up to one municipal year. Please note: Online meeting recordings do not constitute the formal minutes of the meeting; minutes are written and are available on the City of London Corporation's website. Recordings may be edited, at the discretion of the proper officer, to remove any inappropriate material.

John Barradell
Town Clerk and Chief Executive

AGENDA

Part 1 - Public Agenda

1. APOLOGIES

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

3. ORDER OF THE COURT OF COMMON COUNCIL

To receive the Order of the Court of Common Council dated 16 July 2020 appointing the Committee and setting its Terms of Reference.

For Information
(Pages 1 - 2)

4. ELECTION OF CHAIRMAN

The Committee are invited to elect a Chairman in accordance with Standing Order 29.

For Decision

5. ELECTION OF DEPUTY CHAIRMAN

The Committee are invited to elect a Deputy Chairman in accordance with Standing Order 30.

For Decision

6. MINUTES

To agree the draft public minutes and non-public of the previous meeting of the Epping Forest and Commons Committee to be held on the 6th of July 2020.

For Decision
(Pages 3 - 10)

7. 2019/20 COMMITTEE APPOINTMENTS

Report of the Town Clerk.

For Decision
(Pages 11 - 28)

8. EPPING FOREST AND COMMONS COMMITTEE 2020 DATES

Report of the Town Clerk.

For Information
(Pages 29 - 30)

Burnham Beeches & The Commons

9. SUPERINTENDENT'S UPDATE

Report of the Superintendent of The Commons.

For Information
(Pages 31 - 40)

10. DRAFT MINUTES OF THE MEETING OF THE BURNHAM BEECHES AND STOKE COMMON CONSULTATION GROUP 18TH AUGUST 2020

To receive the draft minutes of the meeting of the Burnham Beeches and Stoke Common Consultation Group held on the 18th of August 2020.

For Information
(Pages 41 - 44)

11. TIMETABLE UPDATE - PRODUCTION OF NEW MANAGEMENT PLANS AND ASSOCIATED PUBLIC CONSULTATION - KENLEY COMMON, COULSDON COMMON, RIDDLESOWN AND FARTHING DOWNS/NEW HILL

Report of the Director of Open Spaces.

For Decision
(Pages 45 - 50)

12. PROPOSAL TO EXTEND THE USE OF PUBLIC SPACES PROTECTION ORDERS AT BURNHAM BEECHES - OUTCOME OF THE PUBLIC CONSULTATION PROCESS

Report of the Director of Open Spaces.

For Decision
(Pages 51 - 62)

Epping Forest

13. SUPERINTENDENT'S UPDATE

Report of the Superintendent of Epping Forest.

For Information
(Pages 63 - 94)

14. DRAFT MINUTES OF THE EPPING FOREST CONSULTATIVE COMMITTEE

To receive the draft minutes of the Epping Forest Consultative Committee held on the 24th of June 2020.

For Information
(Pages 95 - 100)

- 15. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
- 16. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**

Part 2 - Non-Public Agenda

17. 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

18. NON-PUBLIC MINUTES

To agree the draft non-public minutes of the previous meeting of the Epping Forest and Commons Committee held on the 6th of July 2020.

For Decision
(Pages 101 - 102)

19. LOCAL PLANS UPDATE - BURNHAM BEECHES SAC

Report of the Director of Open Spaces.

For Information
(Pages 103 - 142)

20. FARM BUSINESS TENANCY UPDATE

Report of the Director of Open Spaces.

For Decision
(Pages 143 - 148)

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

RUSSELL, Mayor	RESOLVED: That the Court of Common Council holden in the Guildhall of the City of London on Thursday 16 th July 2020, doth hereby appoint the following Committee until the first meeting of the Court in April, 2021.
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EPHING FOREST & COMMONS COMMITTEE

1. **Constitution**

A Non-Ward Committee consisting of,

- two Aldermen nominated by the Court of Aldermen
- 8 Members elected by the Court of Common Council at least one of whom shall have fewer than five years' service on the Court at the time of their appointment
- the Chairman and Deputy Chairman of the Open Spaces & City Gardens Committee (ex-officio)
- plus, for the consideration of business relating to Epping Forest only, four Verderers elected or appointed pursuant to the Epping Forest Act 1878.

2. **Quorum**

The quorum consists of any five Members.

For the purpose of non-Epping Forest related business the quorum must consist of five Committee Members who must be Members of the Court of Common Council.

3. **Membership 2020/21**

ALDERMEN

- 2 Robert Picton Seymour Howard
- 2 Robert Charles Hughes-Penney

COMMONERS

- 4 (4) Peter Gordon Bennett
- 4 (4) Caroline Wilma Haines
- 4 (4) Gregory Alfred Lawrence
- 7 (3) Sylvia Doreen Moys, M.B.E.
- 3 (3) Benjamin Daniel Murphy
- 6 (2) Philip Woodhouse, Deputy
- 5 (1) Graeme Martyn Doshi-Smith
- 5 (1) Jeremy Lewis Simons

together with the ex-officio Members referred to in paragraph 1 above, and:-

Verderers pursuant to the provisions of the Epping Forest Act, 1878:-

- Michael Chapman, D.L.
- H.H. William Kennedy
- Paul Morris
- Nicholas Munday

4. **Terms of Reference**

To be responsible, having regard to the overall policy laid down by the Open Spaces & City Gardens Committee, for:-

- (a) exercising of the powers and duties of the Court of Common Council as Conservators of Epping Forest (registered charity no. 232990) and the various additional lands which have been acquired to protect the Forest in accordance, where appropriate, with the Epping Forest Acts 1878 and 1880 (as amended) and all other relevant legislation.
- (b) the ownership and management of the following open spaces in accordance with the provisions of the Corporation of London Open Spaces Act 1878:-
Coulsdon and other Commons (registered charity no. 232989), the other Commons being Kenley Common, Farthing Downs and Riddlesdown
West Wickham Common and Spring Park (registered charity no. 232988)
Ashted Common (registered charity no. 1051510)
Burnham Beeches and Stoke Common (registered charity no. 232987)
- (c) appointing such Consultative Committees as are considered necessary for the better performance of its duties including:-
Ashted Common Consultative Committee
Burnham Beeches Consultation Group
Epping Forest Consultative Committee
West Wickham, Spring Park and Coulsdon Commons Consultative Committee
- (d) expressing views or making recommendations to the Open Spaces and City Gardens Committee for that Committee's allocation of grants which relate to Epping Forest and Commons.

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EPHING FOREST & COMMONS COMMITTEE

Monday, 6 July 2020

Minutes of the meeting of the Epping Forest & Commons Committee held at
remotely on Monday, 6 July 2020 at 11.30 am

Present

Members:

Graeme Doshi-Smith (Chairman)
Deputy Philip Woodhouse (Deputy Chairman)
Peter Bennett
Caroline Haines
Alderman Robert Howard
Alderman Robert Hughes-Penney
Sylvia Moys
Benjamin Murphy
Jeremy Simons
Oliver Sells QC (Ex-Officio Member)
Verderer Nicholas Munday
Verderer H.H William Kennedy

Officers:

Richard Holt	- Town Clerk's Department
Christopher Rumbles	- Town Clerk's Department
Mark Jarvis	- Chamberlain's Department
Alison Bunn	- City Surveyor's Department
Colin Buttery	- Director of Open Spaces
Paul Thomson	- Superintendent of Epping Forest
Andy Barnard	- Superintendent of The Commons
Martin Hartup	- Head Ranger, Burnham Beeches and Stoke Common
Jeremy Dagley	- Head of Conservation, Epping Forest
Jo Hurst	- Business Manager, Epping Forest

1. APOLOGIES

Apologies were received from Verderer Michael Chapman, Verderer Paul Morris and Gregory Lawrence.

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

Alderman Robert Hughes-Penney made a declaration as a South Bucks District ratepayer.

3. MINUTES

The Committee considered the draft public minutes of the last meeting of the Epping Forest and Commons Committee held on the 20th of May 2020.

RESOLVED- That the public minutes and non-public summary of the Epping

Forest and Commons Committee held on the 20th of May 2020, subject the corrections specified, be approved as an accurate record.

4. **EPPING FOREST AND COMMONS COMMITTEE 2020 DATES**

The Committee received a report of the Town Clerk which detailed the various dates of Committee and Group meetings related to the Epping Forest and Commons Committee to be held in 2020.

The Chairman commented that the committee visits listed were unlikely to take place due to the restrictions in place to tackle the COVID pandemic.

RESOLVED- That the report be noted.

5. **EPPING FOREST AND THE COMMONS RISK MANAGEMENT REPORT**

The Committee considered a report of the Director of Open Spaces which provided an update on the management of risks undertaken by the Open Spaces Department and the Epping Forest and the Commons Divisions.

RESOLVED- That: -

- I. The Epping Forest Risk Register included at Appendix 2 be approved; and
- II. That the Commons Risk Register included at Appendix 3 be approved; and
- III. That the removal of one amber risk, TC 009 – Glider Operations – Kenley Airfield from The Commons Risk Register, which now falls under another existing risk heading, as explained in paragraph 20 be approved; and
- IV. That the addition of one red risk; TC 011 - Riddlesdown Quarry to The Commons Risk Register, as explained in paragraph 21 be approved; and
- V. That the addition of one amber risk; TC 012 - Farthing Downs Cattle Grid to The Commons Risk Register, as explained in paragraph 22 be approved.

6. **OPEN SPACES DEPARTMENTAL BUSINESS PLAN 2019/20 - YEAR END PERFORMANCE REPORT**

The Committee received a report of the Director of Open Spaces on the Spaces Department's delivery of its 2019/20 Business Plan. The Director of Open Spaces explained that some detailed information was due to be included once it had been finalised.

A Committee Member commented that there should be a reference to diversity concerns and highlighted the contribution of volunteers to the management of the City of London Corporation managed open spaces. The Director of Open Spaces emphasised the contribution of volunteers during the COVID pandemic and recognised there more could be done to publicise this contribution. The Chairman thanked volunteers for their contribution and agreed that a report be produced to look at promotion of the work of volunteers across all of the City of London Corporation managed open spaces.

Replying to a query from a Committee Member the Director of Open Spaces explained that funds from the sale of surplus properties were held centrally but noted that these funds were reflected in the capital bids process. In addition, it was confirmed that the sale of any properties considered surplus would be subject to Committee approval.

RESOLVED- That the report be noted.

7. CYCLICAL WORKS PROGRAMME BID - 2021/22

The Committee received a report of the City Surveyor which explained the provisional list of cyclical projects being considered for properties under the management of Epping Forest and Commons Committee in the “cyclical works programme”.

Replying to a Member’s query the Director of Open Spaces confirmed that the Epping Forest Consultative Committee had received the report and their comments had been noted accordingly.

A Member commented on the budget underspend and highlighted the large number of works which were awaiting approval to progress. The Director of Open Spaces explained that the primary challenge in resolving this would be the capacity to complete these works and noted the importance of prioritisation in this process. It was noted that the Corporate Asset Sub-Committee Chairman would be exploring options for increased funding for the cyclical works programme. The Deputy Chairman suggested that the Chairman send a note to the Corporate Asset Sub-Committee Chairman explaining the Committee’s view that increased expenditure on the Epping Forest and Commons Committee cyclical works programme should be considered. The Chairman agreed and commented that this should be considered across all the City of London Corporation managed open spaces.

RESOLVED- That the report be noted.

8. REVENUE OUTTURN 2019/20 - EPPING FOREST AND COMMONS

The Committee received a joint report of the Chamberlain and Director of Open Spaces which compared the revenue outturn for the services overseen by the Epping Forest and Commons Committee in 2019/20 with the final agreed budget for the year. It was highlighted that in total, there was a favourable budget position of £1,206,000 for the services overseen by the Committee compared with the final agreed budget for the year.

RESOLVED- That the report be noted.

9. SUPERINTENDENT'S UPDATE

The Committee received a report of the Superintendent of the Epping Forest on the Division’s activities across May and June 2020. The Director of Open Spaces explained that COVID-19 remained the biggest issue effecting the management of Epping Forest with an estimated 122% increase in visitor numbers. In addition, the Director of Open Spaces provided a summary of the activities which were returning to Epping Forest with the lifting of some

lockdown restrictions including catering facilities, lake boating and some golf courses.

The Committee discussed the issue of rough sleepers within Epping Forest. It was noted that the Policy Chair was in discussions with the Mayor of London regarding possible policies for reducing rough sleeping across London and, therefore, should be kept informed of the issues relating to rough sleeping in Epping Forest.

Replying Member's question, the Director of Open Spaces explained that fly tipping instances in the Forest during the period were considerably in excess of pre-COVID-19 trends, noting that it was a significant long-term issue. The Chairman commented that this was a matter which he and the Chairman of the Open Spaces & City Gardens Committee were keen to tackle using a corporate approach across all the City of London Corporation managed open spaces. Following a request from the Deputy Chairman the Director of Open Spaces confirmed that the contacting of local Members of Parliament, to highlight the costs of fly tipping to the management of the open spaces, would be considered accordingly.

The Director of Open Spaces highlighted a petition from residents local to the Forest calling on the City of London Corporation to do more to prevent anti-social behaviour. Further to this it was noted that the City of London Corporation would be exploring options for increased engagement with schemes to mitigate issues caused by increased social gatherings in public open spaces. The Chairman commented that it was important to gauge the efficacy of these schemes before committing City of London Corporation funds. Furthermore, it was suggested that these costs be incorporated into any correspondence with local Members of Parliament.

RESOLVED- That the report be noted.

10. LOCAL PLANS UPDATE: GREEN INFRASTRUCTURE STRATEGY CONSULTATION (SEF 18/20)

The Committee considered a report of the Director of Open Spaces on the City of London Corporation's response to the Epping Forest District Council's Green & Blue Infrastructure Strategy. The Director of Open Spaces highlighted that had been a discussion at length at the Epping Forest Consultative Committee on the 24th of June where Committee members discussed the issue and agreed that the letter, attached at appendix 4, be circulated to Consultative Committee. In addition the Director of Open Spaces provided a summary of the effects the Epping Forest District Council's Local Plan could cause on the ecology of the Forest, including the proposed methodology for mitigating these, and the consultation process that Officers were engaging in with the London Borough of Waltham Forest and Greater London Authority.

It was noted by a member of the Committee that it was vital the City of London Corporation had a fully developed SANGS strategy before the local authority housing is completed and commented that the strategy should be in an

appropriately developed position before engaging with the relevant local authorities. The Director of Open Spaces replied by explaining that a number of different options for the SANGS strategy were being discussed with consultants, with a report being presented for the Committee's approval in due course.

Replying to a query from Member the Director of Open Spaces explained that there was a lack of clarity regarding the governance of the Green Infrastructure Strategy from the Epping Forest District Council but that once confirmed that this had been provided the appropriate method for Member involvement would be explored.

Responding to a Member's question on the financing of SANGS-related activities undertaken by the City of London Corporation the Director of Open Spaces confirmed a tariff system for developers will be required to fund these measures.

The Chairman requested that a timeline be produced to demonstrate progress on this process and stressed the importance of reaching a satisfactory conclusion.

RESOLVED- That: -

- I. The views expressed by representatives on the Consultative Committee about the EFDC GI Strategy and to decide whether these have been appropriately incorporated into the proposed written response (Appendix 4); and
- II. Authority be delegated to the Town Clerk, in consultation with the Chairman and Deputy Chairman, to complete the proposed response letter (Appendix 4) to the Epping Forest District Council's Green & Blue Infrastructure Strategy consultation (incorporating SANGS) in line with previous representations and correspondence to the Council on these matters.

11. **SUPERINTENDENT'S UPDATE**

The Committee received a report of the Director of Open Spaces which provided an update on issues across the nine sites within 'The Commons' division. The Director of Open Spaces introduced the report and highlighted the key points to the Committee including: the successful implementation of the cashless car park payment system, increased visitor numbers and issues relating to engagement with local authorities caused by the dissolution of the District Councils on 31 March and creation of the unitary Buckinghamshire Council.

It was stated by the Deputy Chairman that lessons learnt from the introduction of car parking projects across 'the Commons' should be shared with the colleagues in Epping Forest. The Director of Open Spaces confirmed that Epping Forest had liaised closely with Burnham Beeches, Hampstead Heath and the Square Mile regarding car parking schemes.

RESOLVED- That the report be noted.

12. **EXTENSION OF EXISTING PSPOS AT BURNHAM BEECHES**

The Committee considered a report of the Director of Open Spaces on the extension of existing Public Spaces Protection Orders (PSPOs) at Burnham Beeches. The Director of Open Spaces introduced the report highlighting the context of the PSPOs and the extensive consultation process which must now be undertaken.

Members agreed with the Officer recommendations, suggesting that the detrimental effects of dogs not properly controlled be highlighted to demonstrate to the public the importance of these PSPOs.

RESOLVED-That the Superintendent be authorised to carry out the necessary consultation, publicity and notification on the extension of the existing PSPOs at Burnham Beeches for a further three-year period from 1st December 2020.

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

A Committee Member highlighted a recent murder which was reported to take place in an Epping Forest car park and questioned if any lessons will be learnt from this instance. The Director of Open Spaces explained that Officers were aware of the background to this matter but due to the ongoing criminal investigation, these cannot be discussed in the public session.

14. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT

There was no urgent business considered in the public session.

15. 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.

16. NON-PUBLIC MINUTES

The Committee considered the draft non-public minutes of the last meeting of the Epping Forest and Commons Committee held on the 20th of May 2020.

RESOLVED- That the non-public minutes of the Epping Forest and Commons Committee held on the 20th of May 2020 be approved as an accurate record.

17. SEF 19-20 FARM BUSINESS TENANCY REVIEWS NON-PUBLIC

The Committee considered a report of the Director of Open Spaces regarding the Farm Business Tenancy reviews at Netherhouse and Copped Hall North.

RESOLVED- That the report be agreed.

18. OFFERING OF OPEN SPACES AND HRA ASSETS FOR THE HOUSING OF MOBILE AND WIRELESS EQUIPMENT

The Committee noted that the report was withdrawn.

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

There were no questions received in the non-public session.

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

No urgent business was considered in the non-public session.

The meeting ended at 1.07 pm

Chairman

**Contact Officer: Richard Holt
Richard.Holt@cityoflondon.gov.uk**

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Committee(s): Epping Forest and Commons Committee	Date(s): 07 September 2020
Subject: 2020/21 Committee Appointments	Public
Report of: Town Clerk	For Decision
Report Author: Richard Holt	

Summary

The Committee is asked to consider its appointments for the next twelve months. Current membership of the various Consultative Committees and Groups as listed in Appendix 1. Provision for appointing a Member to serve as an observer on the Open Spaces & City Gardens Committee is also referred to. It is expected that this appointment would encompass the strategic Open Spaces capacity of that Committee.

Recommendations

It is **recommended** that:-

1. Consideration be given to the appointment and composition of the following Consultative Committees and Groups:
 - **Ashted Commons Consultative Group;**
 - **Burnham Beeches and Stoke Common Consultation Group;**
 - **West Wickham, Spring Park and Coulsdon Commons Consultation Group;**
 - **Epping Forest Consultative Committee;**
 - **Epping Forest Joint Consultative Committee; and the**
 - **Epping Forest Management Plan Steering Group.**
2. Consideration be given to the appointment of a representative to the **Open Spaces & City Gardens Committee** for the ensuing year as a local observer for this Committee.

Main Report

Background

The Committee makes a number of appointments to Consultative Committees and Groups that fall within its remit. Although these are reviewed annually it is within the gift of the Committee to set up groups and working parties as required based on the management of projects being undertaken during the year.

Options

That consideration be given to making the various appointments detailed in the report, from amongst the Committee membership. Consideration would then be given to filling any subsequent vacancies from existing or former Common Councilmen.

- The Committee are asked to appoint **the Chairman, Deputy Chairman and three** representatives onto the Ashted Common Consultative Group.
- The Committee are asked to appoint **the Chairman, Deputy Chairman and two** representatives onto Burnham Beeches and Stoke Common Consultation Group.
- The Committee are asked to appoint **the Chairman, Deputy Chairman and three** representatives onto the West Wickham, Spring Park and Coulsdon Commons Consultation Group.
- The Committee are asked to appoint the **Chairman, Deputy Chairman and three representatives**, along with all four Verderers onto the Epping Forest Consultative Committee.
- The Committee are asked to appoint **the Chairman, Deputy Chairman and four** representatives onto the Epping Forest Joint Consultative Committee
- The Committee are asked to appoint **the Chairman, Deputy Chairman and three** representatives, along with all four Verderers, onto the Epping Forest Management Plan Steering Group.
- The Committee are asked to appoint **one** representative onto the Open Spaces and City Gardens Committee.

Implications

There are no financial, legal or risk implications.

Conclusion

That consideration be made to making appointments to the various Consultative Committees, Steering Groups and Management Projects detailed in the report.

Appendices

- Appendix 1 Existing 2019/20 Membership
- Appendix 2 Epping Forest Consultative Committee Terms of Reference
- Appendix 3 Ashted Common Consultative Committee Terms of Reference
- Appendix 4 Coulsdon Commons, West Wickham & Spring Park Consultation Group Terms of Reference
- Appendix 5 Burnham Beeches and Stoke Common Consultative Group Terms of Reference

Contact: *Richard Holt* Tel: 020 7332 3113 Richard.Holt@cityoflondon.gov.uk

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EPPING FOREST AND COMMONS COMMITTEE- COMMITTEE
APPOINTMENTS 2020/21

EXISTING 2019/20 MEMBERSHIP

Epping Forest Management Plan Steering Group

Graeme Doshi-Smith
Philip Woodhouse
Sylvia Moys
Benjamin Murphy
Verderer Michael Chapman
Verderer Murphy
Verderer Thomas

Epping Forest Joint Consultative Committee

Graeme Doshi-Smith
Philip Woodhouse
Sylvia Moys
Gregory Lawrence

Epping Forest Consultative Committee

Graeme Doshi-Smith
Philip Woodhouse
Sylvia Moys
Benjamin Murphy
Verderer Chapman
Verderer Murphy
Verderer Thomas
Verderer Munday

Burnham Beeches and Stoke Common Consultation Group

Graeme Doshi-Smith
Philip Woodhouse
Sylvia Moys
Alderman Robert Hughes-Penney

Ashted Commons Consultation Group

Graeme Doshi-Smith
Philip Woodhouse
Sylvia Moys
Jeremy Simons

West Wickham, Spring Park and Coulsdon Common Consultation Group

Graeme Doshi-Smith
Philip Woodhouse
Sylvia Moys
Jeremy Simons

Open Spaces and City Gardens Representatives

Verderer Joanna Thomas

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Epping
Forest

Registered Charity

Epping Forest Consultative Committee – Terms of Reference

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Purpose of Committee

1. The Epping Forest Consultative Committee considers and discusses areas of current concern or debate at Epping Forest. It receives public reports prior to their consideration by Epping Forest and Commons Committee and provides advice or opinion on those matters.
2. Minutes of meetings and outcomes of the Consultative Committee's discussions are considered by the Epping Forest and Commons Committee in a public report to inform decision making. Likewise, most recent minutes of the Epping Forest and Commons Committee are to be reviewed by the Consultative Committee.
3. The EF Consultative Committee is not a formal decision-making body, but views will be noted in formal reports to the Epping Forest and Commons Committee.
4. Consultative Committee meetings are to be scheduled several weeks prior to Epping Forest and Commons Committee to consider papers and matters arising, with sufficient time scheduled for revisions to papers to be made for Epping Forest Committee, and minutes to be included in documentation.
5. If an Epping Forest and Commons Committee meeting is not immediately preceded by a Consultative Committee, then the papers for that meeting will be circulated to Consultative Committee members electronically, with comments received and circulated by Town Clerks.

Conduct, attendance and other principles

6. The City of London Member's Code of Conduct 2018, associated guidance, declarations appendices and all subsequent revisions apply to Members of this Committee.
7. Should an attendee fail to attend 2 or more out of four consecutive meetings, their place may be forfeited. The Epping Forest and Commons Committee may choose to reallocate this space to an alternative interested organisation.
8. Although not a decision-making Committee, deliberations should be sufficiently well attended for advice to the Epping Forest and Commons Committee to be considered representative. For those reasons minimum attendance of four representatives of locally interested organisations is required.

9. Consultative Committee Members are representatives of their organisation, but Code of Conduct and other legal and administrative requirements apply to individuals. Every effort will be made to accommodate attendance by nominated proxy in unavoidable circumstances, but such substitutions may not always be possible and must not be considered routine.

Scheduling, location and public access

10. Meetings are scheduled at Loughton (as far as is possible), as the geographic centre of Epping Forest. Alternative venues may be considered by agreement.
11. Meetings are on a weekday evening, avoiding school and public holidays.
12. There will be a minimum of three meetings a year thereafter.
13. Should a change of frequency or location, including peripatetic meetings be preferred by this forum, that request must be made to the Epping Forest and Commons Committee.
14. Meetings will be held in public (numbers subject to venue capacity). Public questions are at the discretion of the Chairman.

Allocation of positions

15. The EF Consultative Committee has representation from Chairman, Deputy Chairman, Verderers and other members of the Epping Forest and Commons Committee where interested.
16. Meetings are Chaired by the Chairman of Epping Forest and Commons Committee or Deputy Chairman or other nominated official in their absence.
17. The Superintendent of Epping Forest and other City of London officers will attend as required.
18. The meetings are administered by a representative of City of London Town Clerks Department.
19. Attendants are nominated members of groups holding a specific interest in Epping Forest, either with large membership, a broad geographical spread across the Forest and with knowledge or interest in the themes of heritage; recreation/sport; conservation; general/informal use or voluntary

and friends' groups.

20. Tenants, business partners or other organisations with commercial interest in Epping Forest (or wider City of London Open Spaces) are not invited to attend as other routes exist for such input.
21. Groups nominating a representative must be formal, constituted organisations.
22. Invitations to express interest and to nominate representatives are advertised through print media, social media, email and direct correspondence by City of London. Applications require details of how the nominating organisation meets the above criteria.
23. A balance of themes of interest is ideally met as follows:

Conservation <i>Conservation groups in Forest, or with wider remit</i>	3
Friends/Voluntary <i>Formal working groups e.g. litter pickers groups, 'Friends of' etc.</i>	3
Heritage <i>Historical societies, rural preservation etc.</i>	2
Informal users <i>Schools, Youth groups, families associations, local forums and interest bodies</i>	2
Recreation <i>Recreational user groups – e.g. walkers, riders, cyclists</i>	3
Sports <i>Formal organised sports on Forest e.g. Golf, Football, cricket running etc.</i>	3
	16

24. Should more expressions of interest be received than can logistically be accommodated, selection will be made by members of the Epping Forest and Commons Committee by the following (not in order of importance):
- Size of membership
 - Geographical area of interest (i.e. area of Forest covered)
 - Theme of interest
 - Record of attendance (once established)
25. Epping Forest and Commons Committee may appoint further members or co-opt representatives (for example subject matter experts) to attend where it deems appropriate.

26. The Consultative Committee serves as established for three years (starting in 2018), after which the invitation and nomination process outlined above is repeated.

Requirements and responsibilities

27. Nominated representatives must meet criteria similar to those set out by the Electoral Commission for eligibility for local government election:

- At least 18 years old
- Not employed by the City of London, or another organisation holding a commercial interest in Epping Forest or other CoL open spaces.
- Have not been sentenced to a term of imprisonment of three months or more (including suspended sentences), without the option of a fine, during the five years before nominations close.
- Not disqualified under the terms of the Representation of the People Act 1983 (which covers corrupt or illegal electoral practices and offences relating to donations).

28. Representatives must commit to representing the views of their organisation and members.

29. Representatives must share agenda and documentation internally within their organisation (subject to confidentiality) as well as minutes and outcomes of discussions.

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Ashtead Common Consultation Group

Terms of Reference

Purpose

The main purpose of the Ashtead Common Consultation Group is to assist the delivery of the latest Ashtead Common Management Plan which itself is a product of extensive stakeholder consultation. The aim of the Management Plan is to ensure an appropriate balance between the needs of access and nature conservation and thereby protect and conserve Ashtead Common *in perpetuity*.

1. To consider the annual work programme as set out in the management plan.
2. To identify and agree areas where further public consultation may be required.
3. To consider any major changes to the plan that may arise from time to time.
4. To consider, where appropriate, issues raised by the local community, or visitors and to assist the Superintendent in resolving them.
 - In addition, outcomes of Ashtead Common Consultation Group meetings should not:
 - Compromise the long-term welfare of the site
 - Conflict with the site's use for quiet enjoyment
 - Harm the conservation status of the site

Membership

7. Members of the group are invited to attend a series of meetings on the basis that, together, they ensure a broad representation of the local community and/or belong to organisations and bodies that are closely associated with, or have a direct interest or effect upon, the work carried out at Ashtead Common.
8. The City of London has statutory responsibilities and interests and will always be represented at the Group. Other bodies such as Natural England and Historic England also have statutory interests in the management of the sites and they will be invited to attend as meeting agendas dictate.
9. Membership of the Group will be for a period of four years after which you may be invited to serve for a further period of four years.
10. The Group will identify and welcome additional participants who have an interest in the management of Ashtead Common and accept the terms of reference

Attendance by members of the public.

11. Members of the public may attend. Any member of the public wishing to bring an issue to the attention of the Consultation Group must provide a minimum two weeks written notice and provide details as required, to the Chairman and Superintendent who will consider its inclusion on a future agenda as appropriate.

General

12. The Chairman of the Epping Forest & Commons Committee or his nominated representative shall be Chairman of the Committee.
13. Outputs from the Ashtead Common Consultation Group will inform the Epping Forest and Commons Committee, which remains the decision making body.
14. Meetings will be held not less than once per year (plus an annual 'external site meeting' to view works carried out and discuss forthcoming project issues).
15. The Group will meet formally in January or February each year.
16. Meetings shall take place locally to Ashtead Common.
17. The Town Clerk to convene the meetings and prepare and circulate the agendas and be responsible for the minutes, supported by local Officers where appropriate.
18. A further meeting or site visit may be arranged each year should circumstances require – see **Appendix 1**.

Appendix 1

Protocol for additional meetings site visits

For additional meetings/visits to be held for consideration of essential business by Officers or Members of Consultative Committees/Groups between scheduled meetings.

- i. A minimum of five members of the Consultative Committee/Group, the Chairman and Deputy Chairman must be in agreement to do so.
- ii. The minimum notice period for calling an additional meeting/visit is 28 days.
- iii. The nature of the issue must be submitted in writing to the Chairman, Deputy Chairman and Superintendent at least 14 days before the meeting.
- iv. The Chairman or Deputy Chairman and the Superintendent will preside at all additional meetings/visits.

Coulsdon Commons, West Wickham & Spring Park Consultation Group

Terms of Reference

Purpose

The main purpose of the Coulsdon Commons, West Wickham & Spring Park Consultation Group is to assist the delivery of the latest management plans for the Commons which themselves are a product of extensive stakeholder consultation. The aim of the management plans is to ensure an appropriate balance between the needs of public access and nature conservation and thereby protect and conserve the Coulsdon Commons, West Wickham & Spring Park *in perpetuity*.

1. To consider the annual work programme as set out in the management plans.
2. To identify and agree areas where further public consultation may be required.
3. To consider any major changes to the management plans that may arise from time to time.
4. To consider, where appropriate, issues raised by the local community, or visitors and to assist the Superintendent in resolving them.

In addition, outcomes of the Consultation Group meetings should not:

- Compromise the long-term welfare of the sites.
- Create conflict with each site's use for quiet enjoyment.
- Harm the conservation status of the sites.

Membership

7. Members of the group are invited to attend a series of meetings on the basis that, together, they ensure a broad representation of the local community and/or belong to organisations and bodies that are closely associated with, or have a direct interest or effect upon, the work carried out at the Coulsdon Commons, West Wickham & Spring Park.
8. The City of London has statutory responsibilities and interests and will always be represented at the Consultation Group. Other bodies such as Natural England and Historic England also have statutory interests in the management of the sites and will be invited to attend as meeting agendas dictate.
9. The Ward Councillor(s) local to the Open Space may be represented on the Group according to the duration of their election in that specific role.
10. Otherwise, membership of the Consultation Group will be for a period of four years after which you may be invited to serve for a further period of four years.
11. The Consultation Group will agree and welcome additional participants who have an interest in the management of the Coulsdon Commons, West Wickham & Spring Park and accept the Terms of Reference.

Attendance at meetings by members of the public.

12. Members of the public may attend meetings of the Consultation Group.
13. Any member of the public wishing to bring an issue to the attention of the Consultation Group must provide a minimum two weeks written notice and provide details as required, to the Chairman and Superintendent who will consider its inclusion on a future agenda as appropriate.

General

14. The Chairman of the Epping Forest & Commons Committee or his nominated representative shall be Chairman of the Group.
15. Outputs from the Consultation Group will inform the Epping Forest and Commons Committee, which remains the decision making body.
16. Meetings will be held not less than once per year (plus an annual 'external site meeting' to view works carried out and discuss forthcoming project issues).
17. The Consultation Group will meet formally in January or February each year.
18. Meetings shall take place locally to Coulsdon Commons, West Wickham & Spring Park.
19. The Town Clerk to convene the meetings and prepare and circulate the agendas and be responsible for the minutes, supported by local officers where appropriate.
20. A further meeting or site visit may be arranged each year should circumstances require – see **Appendix 1**.

Appendix 1

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- iv. The Chairman or Deputy Chairman and the Superintendent will preside at all additional meetings/visits.

Burnham Beeches and Stoke Common Consultative Group

Terms of Reference

Purpose

The main purpose of the Burnham Beeches and Stoke Common Consultative Group is to assist the delivery of the latest Burnham Beeches and Stoke Common Management Plans which themselves are a product of extensive stakeholder consultation. The aim of the Management Plans is to ensure an appropriate balance between the needs of access and nature conservation and thereby protect and conserve Burnham Beeches and Stoke Common *in perpetuity*.

1. To consider the annual work programme as set out in the management plans.
2. To identify and agree areas where further public consultation may be required.
3. To consider any major changes to the plans that may arise from time to time.
4. To consider, where appropriate, issues raised by the local community, or visitors and to assist the Superintendent in resolving them.
 - In addition, outcomes of Burnham Beeches and Stoke Common Consultative Group meetings should not:
 - Compromise the long-term welfare of the site
 - Conflict with the site's use for quiet enjoyment
 - Harm the conservation status of the site

Membership

7. Members of the Group are invited to attend a series of meetings on the basis that, together, they ensure a broad representation of the local community and/or belong to organisations and bodies that are closely associated with, or have a direct interest or effect upon, the work carried out at Burnham Beeches and Stoke Common.
8. The City of London has statutory responsibilities and interests and will always be represented at the Group. Other bodies such as Natural England and Historic England also have statutory interests in the management of the sites and they will be invited to attend as meeting agendas dictate.
9. The Ward Councillor(s) local to the Open Space may be represented on the Group according to the duration of their election in that specific role.
10. Otherwise, membership of the Group will be for a period of four years after which you may be invited to serve for a further period of four years.
11. The Group will identify and welcome additional participants who have an interest in the management of Burnham Beeches and Stoke Common and accept the terms of reference.

Attendance by members of the public.

12. Members of the public may attend. Any member of the public wishing to bring an issue to the attention of the Consultative Group must provide a minimum two weeks written notice and provide details as required, to the Chairman and Superintendent who will consider its inclusion on a future agenda as appropriate.

General

13. The Chairman of the Epping Forest & Commons Committee or his nominated representative shall be Chairman of the Committee.
14. Outputs from the Burnham Beeches And Stoke Common Consultative Group will inform the Epping Forest and Commons Committee, which remains the decision making body.
15. Meetings will be held not less than once per year (plus an annual 'external site meeting' to view works carried out and discuss forthcoming project issues).
16. The Group will meet formally in January or February each year.
17. Meetings shall take place locally to Burnham Beeches.
18. The Town Clerk to convene the meetings and prepare and circulate the agendas and be responsible for the minutes, supported by local Officers where appropriate.
19. A further meeting or site visit may be arranged each year should circumstances require – see **Appendix 1**.

Appendix 1

Protocol for additional meetings site visits

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- iv. The Chairman or Deputy Chairman and the Superintendent will preside at all additional meetings/visits.

Agenda Item 8

Date	Committee/Meeting/Visit
	* LIST UPDATED September 2020 *
13 January 14 January 29 January	Epping Forest & Commons Committee Burnham Beeches and Stoke Common Consultation Group Epping Forest Consultative Committee
3 February 7 February 24 February 26 February 27 February	Open Spaces and City Gardens Committee EFDC Liaison/EF&CC Local Verderer Election Nomination meeting North and South Verderer Election North Verderer Election South
10 March 16 March 30 March	Epping Forest & Commons Committee Ashted Common Consultative Group West Wickham, Spring Park and Coulsdon Commons Consultation Group
3 April 7 April 20 April	LBWF Liaison/EF&CC Local Open Spaces and City Gardens Committee Epping Forest Joint Consultative Committee
16 May 20 May	Epping Forest & Commons Committee Epping Forest Saturday Visit Epping Forest & Commons Committee
2 June 10 June 12 June 27 June	Lord Mayor's visit to Burnham Beeches Epping Forest Consultative Committee LBR Liaison/EF&CC Local Committee visit to Ashted Common
6 July 14 July	Epping Forest & Commons Committee Open Spaces and City Gardens Committee
18 August	Burnham Beeches and Stoke Common Consultation Group
4 September 5 September 7 September 29 September	EFDC Liaison/EF&CC Local Epping Forest & Commons Committee Epping Forest Saturday Visit Epping Forest & Commons Committee West Wickham, Spring Park and Coulsdon Commons Consultation Group
13 October 16 October 15 October 21 October	Open Spaces and City Gardens Committee LBWF Liaison/EF&CC Local Ashted Common Consultative Group Epping Forest Consultative Committee
16 November	Epping Forest & Commons Committee
2 December 11 December	Open Spaces and City Gardens Committee LBR Liaison/EF&CC Local

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Committee(s):	Date(s):
Epping Forest & Commons Committee	7 September 2020
Subject: Superintendent's Update	Public
Report of: Director of Open Spaces	For Information
<p style="text-align: center;">Summary</p> <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> <p>Recommendation Members are asked to note the contents of this report.</p>	

Burnham Beeches and Stoke Common

1. Volunteer Group activity at Burnham Beeches and Stoke Common remained suspended throughout the period due to the Coronavirus outbreak. A few individual volunteers have been undertaking very specific tasks (such as livestock lookers, talking to members of the public about the livestock and carrying out ecological/hydrological survey work). Several volunteer litter pickers are also active to help staff with the huge extra amounts still being left.
2. Since the car parks at Burnham Beeches reopened on 18 May visitor numbers have remained at around 2 to 3 times normal levels for all days of the week with the attendant equivalent increases in litter, waste and the number of incidents of misuse all of which are dealt with by the Ranger team. Visitor numbers have declined slightly since the start of the school holidays and opening of other attractions but remain higher than usual for this time of the year.
3. Car park charges were restarted on the first weekend in June once pay by phone operations had been introduced to all car parks thereby supplementing the existing 'cash only' payment option. Around 50% of car park income is now through the Pay by Phone provider. High visitor numbers have resulted in the car park charge revenue in June and July compensating for most losses due to Covid closure and restrictions in April and May.
4. The cafe at Burnham Beeches has remained as a 'takeaway kiosk service' since reopening on the 3 June. The one way, socially distanced queuing system is working well and café report that to date they have been very busy, especially for ice creams!

5. The café is also selling face masks made by a local lady who is donating the proceeds to the Thames Valley Hospice. Her initial £500 target has been easily exceeded.
6. The site toilets opened on the 26 June, some cubicles remaining closed to ensure social distancing and a one-way system in place using different gates to those for the café.
7. Signage advising about COVID issues and social distancing has been regularly updated as the situation has changed. Website and social media have continued to be valuable in keeping visitors informed.
8. A six-week public consultation regarding the Public Spaces Protection Orders (PSPO) commenced on 7th July and ran until 18th August. Information on the proposal to extend the existing orders for a further three years and how to make any comments was advertised widely on-site notices, circulated on social media, the website and in local papers. See separate report.
9. Work has continued regarding the local plan and development pressure around Burnham Beeches. See separate report regarding this in more detail.
10. Three new/replacement benches have been erected on Stoke Common based on nature themed designs from local school children and funded via donations from residents.
11. The Ranger team has still been working a slightly modified work pattern with staggered rotas to ensure cover and reduce congestion in the yard area at arrival/departure times. Other staff are mixing working from home with working in the office to ensure maximum efficiency while reducing risk. The exact balance is different for each member of staff depending on their tasks. The new office layout and routines are working well with social distancing now part of the normal work pattern, with for example, residential staff avoiding using the mess area in favour of non-residential staff, lines on the floor to help with social distancing and procedures in place to deal with deliveries and contractors.
12. The temporary Assistant Ranger's post has been extended for a further 6 months and is currently helping the Conservation Officer with biological data input in a pause between large-scale practical projects.
13. The Ranger team has continued to manage health and safety risks which has included plenty of interaction with visitors. Livestock management has included the return of the cattle to Stoke Common. The ponies and some of the cattle have remained in the large fenced area of the Beeches with the rest of the cattle being moved between various invisible fencing loops at Burnham Beeches.

14. Other habitat management has included the spraying of bracken at Burnham Beeches and Stoke Common and spraying of Rhododendron regrowth, cutting bracken where it occurs under the old pollards and checking of tethers on several old pollards with help from the Hampstead Heath arborist team. A training/discussion session was held for a small number of staff to prepare for the winter old pollard cutting programme.
15. The summer mowing programme has been carried out including cutting the Main Common in the Beeches and areas of invasive species on the North Common at Stoke Common as well as major paths. Three fields at Hedgeley were cut, where the cattle graze each year to help with grassland conservation for the Parish Council when they are not required in Burnham Beeches.
16. A lichen survey of the old beech trees at Burnham Beeches (funded by Plantlife as part of their 'Back from the Brink' project) found several more locations for the Red Listed species *Pyrenula nitida* as well as other old beech bark community specialists. A full report is pending but the surveyor commented that the 'Pinhead Lichen Index' is now 10, meaning that the Beeches has reached SSSI quality for this group of species alone. There were also several species found that are new to South East England. A day of filming was carried out in the Beeches for a training video as part of this project.
17. A spider survey of Stoke Common carried out in 2019/20 concluded with some days of fieldwork in the spring. Nine species were found that are considered nationally rare. The species diversity was greater in the areas where the heather is older and taller (which is better for web building) so the area should continue to improve over time as the heathland restoration process matures.
18. Ecological work over the reporting period has included the annual vegetation monitoring and continuing survey of the young pollards. A local volunteer has helped with the butterfly transects on Burnham Beeches and Stoke Common.
19. Oak Processionary moth has been discovered for the first time at Stoke Common – six nests were located by Rangers and have been removed by the approved contractor. The Forestry Commission has been notified, as required for new sites in the control zone, and they have indicated that they will wish to spray the trees early next year. Discussions have started with Natural England and Butterfly Conservation regarding the potential negative impacts of doing this within a heathland SSSI.

The Commons Car park infrastructure project

20. This project will see the replacement of existing carpark charge infrastructure at Burnham Beeches and its introduction at Farthing Downs and Riddlesdown. The Director of Open Spaces signed off the Gateway 5 report at the end of March.

However, Covid 19 restrictions prevented necessary site meetings with contractors until the end of May.

21. The capital budget and expenditure codes have been set up for the physical delivery of the project which is split into 4 elements:

- i. ANPR & payment equipment & enforcement system supply and installation
- ii. Electric service installation where required for the above
- iii. Minor landscape and ground works required at each location
- iv. Condition signage & sign frame production

22. Orders for electrical service installation and groundworks have been placed for works to commence in September 2020. The main ANPR system contract and order is being issued through City procurement – likely start date of mid to end November 2020. Final signage details and production are being confirmed to meet the above timeframe.

23. Charge tariff options for all locations are being consulted on through local consultation groups in August and September and a decision report on this issue will be brought to the November 2020 meeting of this Committee.

24. Work on visitor information FAQs and on ensuring all back-office functions for collection of revenue are established for the system to go live in November.

PARTNERSHIPS

Kenley Revival update

25. The onsite signage has been installed. The suite of 23 signs comprises six large wing-shaped signs to convey the significance of the historic landscape and basic site information, four small wings to mark features of interest and 13 tabletop information panels. Each sign will soon have a small pad of hard surfacing installed around it.

26. The Legacy Officer continues to work with volunteers to research and produce articles, newsletters and printed resources to engage people with the story of Kenley Airfield. A leaflet has been produced to accompany the new onsite signage and new articles are regularly posted on the website. Memorial signs commemorating Kenley's losses during WWII have been installed to mark the 80th anniversary of the Battle of Britain.

27. Graffiti on the Rifle Range was removed, and a graffiti resistant coating applied. However, this did not stop further graffiti appearing soon after on the wall and one of the fighter pens. This too has been cleaned off. We are now investigating the use of covert cameras to prevent further anti-social behaviour.

28. An article appeared in the Sunday Express on July 26 headed 'Bid to save crumbling Battle of Britain site.' Overall, the piece was descriptive and tame in nature, but it highlighted the issue affecting the conservation works. It quoted from the statement

issued by the City saying, 'We are committed to delivering this conservation project of great historical significance.'

29. Efforts to resolve the defects affecting the conservation work continue. At time of writing, we have received a report from our appointed expert giving his view on whether there was a general failure to warn. We are currently working with colleagues in Corporate Contracts and our legal firm Beale & Co to assess the implications of his opinion. The mortar defects issue was mentioned in a recent edition of the Sunday Express and the City was quoted.

The West Wickham and Coulsdon Commons

30. All Volunteer Group activity and events on the West Wickham and Coulsdon Commons remain suspended. Individual volunteers have been checking livestock throughout the week alone which has helped support the duties of the Ranger team.
31. The Ranger team have maintained social distancing working by carrying out tasks independently on individual sites and minimising time spent in the office and yard. Other staff are mixing working from home with working in the office to ensure maximum efficiency while reducing risk. The exact balance is different for each member of staff depending on their tasks. The new office layout and routines are working well with social distancing now part of the normal work pattern.
32. Gated car parks at Farthing Downs, Riddlesdown and Spring Park have been reopened as of Friday 15 May following the announcement of the lockdown restrictions easing. The sites have generally been quieter since the last update but remain well-used throughout the weekdays and weekends. Following anti-social behaviour in the overflow car park at Farthing Downs, this car park has been opened only at weekends to reduce the risk of similar events occurring whilst providing surplus parking when the site is busiest. Interactions with visitors have shown how much the Commons have been needed during lockdown and their importance for people's well-being and mental health.
33. The first of the adult brown hairstreak butterflies have been spotted at Spring Park following a successful rotational cutting of blackthorn habitat. Brown hairstreak egg surveys were carried out and identified Spring Park as one of the best breeding sites for this RDB species in the SE.
34. The newly made earth bund at the Riddlesdown car park will be seeded with chalk grassland species provided by Butterfly Conservation as part of the local Brilliant Butterflies project funded by HLF for the benefit of chalk grassland invertebrates. Plug plants will be added at some point in the future to supplement the seeding.

35. As part of the same initiative, the meadow at Spring Park will be sown with a local wildflower mix specifically designed to provide additional nectar sources and support a greater diversity of butterflies, moths and other invertebrates. The site has benefited from reduced amenity mowing over the last few years and the arrival of wildflowers including greater yellow rattle is positive indicator of diversification potential. Rangers have met with partners from the Brilliant Butterflies Project and will be determining seed quantities in September once the hay cut has been completed.
36. A Woodland Management Plan for the West Wickham Commons has been drafted and sent to the Forestry Commission for review. The plan will support the actions to be set out in the 2021-2031 management plan for both Spring Park and West Wickham and help secure a grant for management actions.
37. The main herd of Sussex cattle having been grazing Farthing Downs since May. The remaining herds of cattle and sheep have been grazing compartments across the Coulsdon Commons to fulfil the obligations of the Countryside Stewardship Agreements currently in place.
38. Contractors have completed works to install 'bunds' on the stretch of Stites Hill Road that dissects Coulsdon Common to prevent vehicles from accessing the site. A section of the new bunds at the base of the Stites Hill dip have been eroded by flash floods in the recent storms.
39. Rangers have been working with the Happy Valley Ranger, (Croydon Council) and The Friends of Farthing Downs and Happy Valley to install new wooden marker posts as part of the Farthing Downs and Happy Valley Nature Trail. The Friends of Farthing Downs secured funding from the central grants programme. The trail will have audio descriptions for each of the 29 posts, a reprinted booklet and will be dubbed in four popular languages: Hindi, Polish, French and Urdu.
40. The Rangers have been collectively pulling Ragwort across the Commons. This year's effort has been difficult without regular and seasonal volunteers, so the focus was on key areas and fields that were to be hay cut to avoid ragwort contaminating bales for cattle.
41. Hay has been cut and collected from fields on New Hill, Farthing Downs and Kenley Common in August with the remainder on Riddlesdown, Coulsdon Common and Spring Park to be done later in the month.
42. Other management tasks have included the removal of bullrush and invasive species in the Spring Park pond, clearance of hawthorn saplings on 8-Acre on Farthing Downs, mowing of bracken and low-lying brambles on Coulsdon Common and removal of birch saplings on the West Wickham Common heath.

43. Signage advising of the need for continued social distancing following the updated government advice has been displayed throughout the period on noticeboards and gates. The new CoL website and social media have been used to update visitors throughout and after the lockdown.

Ashtead Common

44. Public consultation on the 2021-2031 Management Plan has commenced. This is in the form of an online survey that has been widely distributed among the Ashtead community and beyond. The consultation will remain live through September and the results will be considered by the Consultative Group in October.
45. Visitor numbers have decreased significantly since other attractions reopened but remain higher than pre-lockdown levels.
46. Since March 23 staff cover has generally been restricted to one person in the workplace at any one time, backed up by others on duty and working at home if necessary. This is effectively a weekend level of cover, but for every day of the week. One team member has found it difficult to work at home, and since 21 April this person has been allowed to work at the office in isolation from other staff. Arrangements have been validated and a Blue Certificate is now displayed at the Estate Office.
47. The level of OPM infestation appears to be similar to last year. This is a surprise, because it was expected to rise again. There are indications that the predating fly might be present, and this might explain the levelling-off.

Support Services Team (SST)

48. The SST at Burnham Beeches is now working from the office on a rota basis to maximise social distancing and minimise general Covid-19 related risks. The SST at Merlewood (MEO) and Ashtead Estate (AEO) will return to those offices as of 1 September 2020 with similar restrictions.
49. The Business Manager has been working with the Head Rangers at MEO and AEO to ensure Covid-19 safety for the team as some members have requested additional measures, due to pre-existing health issues. Individual risk assessments have been completed in readiness for the return.

Incidents

Burnham Beeches & Stoke Common

50. There were 12 incidents in the period 1st July up to the 19th August.

51. Two incidents of encroachment are being dealt with - by Ranger team and the City surveyor. There were two fly tipping incidents one involving a lorry load of builder's waste dumped on the roadside at the edge of Stoke Common dealt with by or local Local Authority waste team.
52. The remaining incidents are a miscellaneous collection which included site sign damage at the Beeches and a bouncy castle on Stoke Common.

Ashted Common

53. There have been three minor fires, one of which was attended by the Fire Service.

The West Wickham and Coulsdon Commons

54. There were 16 incidents covering the period of 17 June to 19 August.
55. Two sheep were killed and another injured because of a dog attack on Farnet, Riddlesdown. After information was put out onsite and on social media, the person responsible has come forward.
56. There have been three incidents of anti-social behaviour including vandalism to a gate on Farthing Downs, loud music being played at night near Coulsdon Common, and an altercation between two visitor groups on Kenley Common.
57. The sewage leak from overflowing drains being dealt with by Thames Water on Lower Woodplace Farm Fields on 16 and 17 June has been resolved following several days of work onsite. More work has been needed on portions of the drains in the adjacent land to Farthing Downs and, following a dispute about access through the grassland habitat, Thames Water were refused consent to operate from the SSSI due to the nature of the heavy vehicles being used.
58. One incident of fly tipped building waste at the car park on Spring Park was dealt with by the Rangers. Evidence of addresses were found within dumped bags and referred to the appropriate local authority.
59. Other incidents included Rangers assisting police with a missing vulnerable person, a catalytic converter theft to a member of staff's vehicle outside of the Merlewood Estate Office, verbal abuse from a member of the public, livestock worrying and biker injured on Kenley Common.

Filming, major events and other activities

Burnham Beeches

60. All events and filming were suspended at Burnham Beeches and Stoke Common until the start of August - some licences are being issued for small scale covid safe activities and filming enquiries are being received through no firm plans are in place at present

Andy Barnard. Superintendent of The Commons
andy.barnard@cityoflondon.gov.uk

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BURNHAM BEECHES AND STOKE COMMON CONSULTATION GROUP **Tuesday, 18 August 2020**

Minutes of the meeting of the Burnham Beeches and Stoke Common Consultation Group held remotely at 7.00 pm

Chairman Graham Doshi-Smith

Officers: Andy Barnard, Helen Read, Deborah Harris, Richard Holt,
James Gibson,

Attendees: Alderman Robert Hughes-Penney, Deputy Chairman Philip Woodhouse,
Andy Booth, Les Davies, Caroline Spicer, Katie Ayers, David Banks,
Jenny Jebson, Lisa Pope, Annie Arscot, Keith Greenhough, Mary Kolhase

1. Apologies

Apologies from were received from Andy McVeigh, Joy Winyard, Mark Bradshaw, Sylvia Moys and Adrian Sutton

2. Minutes

The Group considered the draft minutes of the previous meeting of the Burnham Beeches and Stoke Common Consultation Group held on 14th of January 2020. A Group member noted a correction on the spelling of their name.

RESOLVED- That, subject to the correct specified, the minutes of the Burnham Beeches and Stoke Common consultation Group on the 14th of January 2020 be confirmed as an accurate record.

3. Public Spaces Protection Orders

The Director of Open Spaces provided a presentation to the Group on the Public Spaces Protection Orders (PSPO) for Burnham Beeches. It was explained that the PSPO were last extended on December 1st 2017 and that, further to the requirement to extend the PSPO every three years, the PSPO at Burnham Beeches must now be extended if they are to remain in place after November 30th 2020. The Superintendent explained the public consultations process, including the outcomes of this consultation, noting the high percentage of support received for the PSPOs.

A member of the Group commented that the Burnham Parish Council supported the extension of the current PSPO at Burnham Beeches for a further three years. It was noted by a Group member that education would be key to the success of the PSPO. In response it was confirmed that a full-time ranger position concentrating on educational matters was due to be appointed.

Responding to a query from a Group member the Superintendent explained that were some legal limitations which had affected the format of the public consultation.

A Member commented that as a regular using of Burnham Beeches they supported the requirement for PSPOs to support the open space and noted that some space where dogs can be off their lead would be very much appreciated. The Superintendent explained that it had been a long process to achieve balance in this matter but noted that the culture on responsible dog walking is beginning to change.

The Superintendent confirmed that the views of this Consultative Group and outcome of the public consultation will be reported to the Epping Forest and Commons Committee in September 2020.

RESOLVED- That the outcome of the public consultation supporting the extension of the PSPOs at Burnham Beeches for a further three years be noted. Approval on that outcome to be sought at the September 2020 meeting of the Epping Forest and Commons Committee

4. **Car Parking infrastructure and Charges**

The Superintendent provided the Group with an update on Burnham Beeches Car Parking infrastructure and Charges. Superintendent explained the three tariff options. The Superintendent confirmed and demonstrated that bench marking of costs had taken place against other local open spaces. The Superintendent confirmed that increased visitor numbers since the easing of lockdown has meant that income 2020/21 income targets for car parking remain on track.

In addition the Superintendent explained that the City was working with Buckinghamshire Council to look at options for introducing clearway roads in the areas near Burnham Beeches to resolve illegal parking on roads and verges which had been exacerbated by the large visitor increase in the COVID19 effected period. The Superintendent confirmed that the City is considering providing some financial support to the Council to facilitate this project.

It was commented by a Group member that while they were in support of these proposed measures, they had some concerns on the displacement affect to other nearby roads. Replying to this the Superintendent explained that the proposed clearway roads had been extended to considerable distance from Burnham Beeches to deter visits from parking on other roads and walking to the site.

Following a query from a Group member the Superintendent confirmed that the details of who at Buckinghamshire Council had been contacted would be provided.

Replying to concerns expressed by members of the Group Superintendent explained that he would investigate how residents might avoid having to pay for parking on the highway but noted that this may be outside of the City's purview. Further to this Group members suggested that consideration also be given to the impact on local business.

In response to a comment made by a Group member the Superintendent agreed that parking discounts for volunteers at Burnham Beeches would be an appropriate measure.

The Burnham Beeches and Stoke Common Consultation Group commented that they were in support of Burnham Beeches Car Park Tariff option 1.

RESOLVED- That the Burnham Beeches Car Park Tariff options be noted.

5. **Planning and development issues**

The Conservation Officer provided a presentation on planning and development issues in relation to Burnham Beeches after a short update on progress with the Burnham Beeches Management Plan. It was explained that the mitigation strategy

for the impact of recreation pressure, drawn up by the Local Authority, consisted of a zone of 500m around the Beeches where no additional houses can be built and a zone between 500m and 5.6km where developers have to pay a contribution to fund projects including an additional ranger, budget for the ranger to hold events, bespoke electronic interpretation and monitoring of visitor numbers and impacts. In addition, an update regarding the situation regarding development in the Slough Borough Council area was provided.

A Group member commented that, while the employment of a specialist educational ranger was a positive result, all rangers on the site should consider education as a key component of their roles. The Conservation Officer agreed and explained that the educational ranger is additional to the existing rangers and not a replacement for them.

Replying to a question from the Deputy Chairman the Conservation Officer confirmed that, while the exclusion zones for development at various open spaces may be different, they are calculated in the same way. Officers from the different open spaces management teams were in regular contact to exchange experience.

In response to comments from Group members the Superintendent confirmed that while he was sympathetic with the view that the more affordable dwellings in the local area was preferable this was a matter for the local authorities.

RESOLVED- That the update on planning issues be noted.

6. **Any other business**

There were no items of urgent business considered.

7. **Date of Next Meeting**

The Town Clerk explained that an appropriate meeting date for early next year would be established and the relevant checks made as to whether a remote meeting was still required.

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Committee(s): Epping Forest and Commons Committee	Date: 07/09/2020
Subject: Timetable update – Production of new Management plans and associated public consultation - Kenley Common, Coulsdon Common, Riddlesdown and Farthing Downs/New Hill	Public
Report of: Director of Open Spaces	For Decision
Report author: Andy Barnard	

Summary

On 13th January 2020, your committee approved the necessary actions and timetable to draft and consult on the production of seven, ten-year Site Management Plans i.e. for Ashtead Common, West Wickham Common, Farthing Downs and New Hill, Kenley Common, Coulsdon Common and Spring Park.

In that report the Superintendent of The Commons advised that there was some uncertainty with the approved timetable due to staff shortages within the Rangers' team. Those staff shortages were not resolved until April 2020 and even then only 'in part'. In the meantime, the Covid-19 pandemic has added further stress to the deadlines set by the original timetable and these issues must now be addressed. This report seeks approval for an amended timetable for the production of four of the seven new Management Plans i.e. Kenley Common, Coulsdon Common, Riddlesdown and Farthing Downs/New Hill.

The amended timetable does not negatively affect the timing of submissions for the grant related Woodland Plans and Countryside Stewardship Agreements necessary to help fund the programmes of work associated with the drafting of those plans.

The production of the remaining three Management Plans, i.e. Ashtead Common, West Wickham Common and Spring Park remain on schedule according the January 2020 approved timetable (Appendix 1).

Recommendation

Members are asked to:

- Approve the amended timetable for the production of the 10-year management plans for Kenley Common, Coulsdon Common, Riddlesdown and Farthing Downs/New Hill. **Table 2a.**

Main Report

Background

1. On 13th January 2020, your committee approved the necessary actions and timetable to draft and consult on the production of seven, ten-year Site Management Plans i.e. for Ashtead Common, West Wickham Common, Farthing Downs and New Hill, Kenley Common, Coulsdon Common and Spring Park.
2. In paragraph's 12 and 20 of the January 2020 report, members were forewarned that the level of confidence in the Management Plans production timetable (extract shown as **Appendix 1**) was uncertain given the then significant staff shortages that would take months to resolve.
3. As such your Superintendent committed to providing an amended timetable, should the need arise, in September 2020 for consideration by this Committee.

Current Position

4. The above mentioned staff shortages were partly resolved in April 2020 when two new Rangers and one part-time Support Service Assistant were appointed. However, the start of the management plan drafting process was necessarily delayed.
5. This position was further exacerbated by the Covid-19 pandemic that since March 2020 has required a very narrow management focus i.e. the delivery of essential service on the open spaces.
6. Given the above it has not been possible to meet the demands of the original Management Plan production timetable (Appendix 1) for four of the seven management plans i.e. Kenley Common, Coulsdon Common, Riddlesdown and Farthing Downs/New Hill.
7. The production of the remaining three management plans, i.e. Ashtead Common, West Wickham Common and Spring Park remain on schedule according the January 2020 approved timetable.

Proposal

8. A 'twin track' approach to the production and consultations of the draft management plans is now proposed, i.e.
 - a. Ashtead Common, West Wickham Common follow the timetable approved by this committee in January 2020 (Appendix 1)
 - b. Farthing Downs and New Hill, Riddlesdown, Coulsdon Common and Kenley Common follow the amended timetable as proposed in Table 2a below.

Table 2a. Timetable for Farthing Downs, Riddlesdown, Coulsdon and Kenley Commons

Sept 2020 – March 2021	Produce 1 st draft new Management Plans.
March/ April 2021 2020	Consult conservation specialists
April – July 2021	Public Consultation on draft management plans including WWCCSP Consultative Group. Develop detailed work programmes linked to CSSG
August – Oct 2021	Assess consultation feedback and finalise management plan. Develop detailed work programmes linked to CSSG Submission of CSSG to NE for approval.
Nov 2021	Assess Equality issues arising from the draft plan process
Jan - March 2022	Presentation of plans to WWCCSP Consultation Group
March 2022	EFCC 'decision report' on all management plans
March 2022	Submission of approved plans to Natural England for ratification
1 April 2022	Start date of ratified Management Plans
Key	Consultation Phases
	Development Phases

Corporate & Strategic Implications

9. The proposals in this report support the Corporate Business Plan as follows:

Contribute to a Flourishing Society

- People enjoy good health and wellbeing
- Communities are cohesive and have the facilities they need

Shape outstanding environments

- Our Spaces are secure, resilient and well maintained.
- We have clean air, land and water and a thriving and sustainable environment

10. And the Open Spaces Business Plan outcomes:

- Open Spaces and Historic Sites are thriving and accessible
- Spaces enrich people's lives
- Business practices are responsible and sustainable

Implications

11. The rescheduling indicated by Table 2a does not affect the timing of Countryside Stewardship and Woodland grants as previously outlined in my report to this committee of January 2020.

Conclusion

12. The original timetable (Appendix 1) approved by this Committee in January 2020 will be pursued for the Ashted Common, West Wickham Commons and Spring Park plans.
13. A revised timetable (Table 2a) is recommended for the four remaining Commons.

Appendices

- Appendix 1 – Original timetable from January 2020 Committee report

Background Papers

- **January 2020 report to the Epping Forest and Commons Committee.**
Management Plan timetable and submission of Countryside Stewardship Scheme applications and associated Woodland Plans

Andy Barnard
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Appendix 1.

Management plan timetable as approved by Epping Forest and Commons Committee, January 2020.

Table 2.

Jan 2020	Agree Governance and Timetable. Epping Forest and Commons Committee
March 2020	ACCG and WW&CCCG. Introduction to the management plan and grant applications process. Set out subsequent consultation timing for each group.
March – May 2020	Produce 1 st draft new Management Plans. See paragraph 23
April/July 2020	Consult conservation specialists
June/July 2020	WW&CCCG and ACCG site visits to assess draft plan
Summer 2020	Review number of plans achievable to this timetable and adjust if required. Committee visit to a ‘management plan site’ to review the draft plan. A detailed ‘issues report’ to be produced prior to the site visit to highlight topics for Members’ consideration.
June/Oct 2020	Public Consultation on draft management plans
Autumn/Winter 2020	Assess consultation feedback and finalise management plan.
December 2020	Assess Equality issues arising from the draft plan process
January 2021	Presentation of draft plans for approval to EFCC
March 2021	Presentation of plans to both Consultation Groups
March 2021	EFCC ‘decision report’ on all management plans
Feb/March 2021	Submission of approved plans to Natural England for ratification
1 April 2021	Start date of ratified Management Plans
Key	Consultation Phases
	Development Phases

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Committee(s):	Date(s): 07/09/2020
Subject: Proposal to extend the use of Public Spaces Protection Orders at Burnham Beeches – Outcome of the public consultation process	Public
Report of: Open Spaces	For Decision
Report author: Director of Open Spaces	

Summary

Five Dog Control Orders (DCOs) were introduced by your Committee at Burnham Beeches Special Area of Conservation (SAC) and National Nature Reserve (NNR) on 1st December 2014. These subsequently became Public Spaces Protection Orders (PSPOs) and their effect was extended by your Committee for a further three-year period from 1st December 2017. They concern themselves solely with the reduction of antisocial dog behaviour on that site.

The Director of Open Spaces requested approval to consult on the extension of the 5 Public Spaces Protection Orders at Burnham Beeches for a further three years, commencing 1st December 2020, in his report to this Committee dated 6th July 2020.

Approval was granted for the Superintendent to carry the necessary consultation, publicity and notification commencing 7th July and ending 18th August 2020.

This report seeks your Committees' decision concerning the continued use of the five existing PSPOs. Your officers' advise that there are reasonable grounds to conclude that these PSPOs will continue to prevent the recurrence of the detrimental activities prohibited by them.

Recommendation(s)

Members are asked to:

1. Approve Option 1 as explained in this report i.e. Extend the effect of the existing PSPOs at Burnham Beeches for a further three years from 1st December 2020.
2. Authorise the Comptroller and City Solicitor to make the replacement/extended Orders.
3. Delegate authority to the Director of Open Spaces to authorise officers at Burnham Beeches to issue Fixed Penalty Notices in relation to Public Spaces Protection Orders.
4. Set the fixed penalty for breach of a Public Spaces Protection Orders at Burnham Beeches at £80 with a reduction to £50 if paid within 10 days.

Main Report

Background

1. Five Dog Control Orders (DCOs) were introduced by your Committee at Burnham Beeches Special Area of Conservation (SAC) and National Nature Reserve (NNR) on 1st December 2014. These subsequently became Public Spaces

Protection Orders (PSPOs) and their effect was extended by your Committee for a further three-year period from 1st December 2017. They concern themselves solely with the reduction of antisocial dog behaviour on that site.

2. The Director of Open Spaces requested approval to consult on the extension of the five Public Spaces Protection Orders at Burnham Beeches for a further three years, commencing 1st December 2020, in his report to this Committee dated 6th July 2020.
3. Approval was granted at that time, for the Superintendent to carry the necessary consultation, publicity and notification.
4. The necessary consultation, publicity and notification to extend the above orders for a further 3 years commenced 7th July 2020 and ended on 18th August 2020.

Current Position

5. The PSPOs currently operating at Burnham Beeches as follows – **Map 1**:

Order 1. Failing to remove dog faeces. Applies to 100% of the site.

Order 2. Not keeping a dog on a lead (max length of lead 5m). Applies to the area **marked 2** on the map

Order 3. Not putting and keeping a dog on a lead when directed (told) to do so by an authorised officer. Applies in the area **marked 3** on the map.

Order 4. Permitting a dog to enter land from which dogs are excluded. This applies to the area **marked 4** on the map i.e. the immediate vicinity of the Burnham Beeches café.

Order 5. Taking more than the specified (allowed) number of dogs (which a person may take) onto the land. The specified number of dog previously approved by this committee is a maximum of four and applies to 100% of the site.

6. Under section 67 of the Anti-social Behaviour, Crime and Policing Act 2014 it is an offence for a person without reasonable excuse to do anything that they are prohibited from doing by a PSPO, or to fail to comply with a requirement to which they are subject under a PSPO. A person guilty of an offence is liable on summary conviction to a fine not exceeding level 3 on the standard scale (£1,000). Under section 68, a constable or authorised person may issue a fixed penalty notice to anyone that they have reason to believe has committed an offence, offering that person the opportunity to discharge any liability to conviction by payment of a fixed penalty. In September 2017 your Committee set the fixed penalty for breach of a PSPO at Burnham Beeches at £80 with a reduction to £50 if paid within 10 days. Your Committee also approved an Enforcement Protocol to ensure a fair and consistent approach PSPO enforcement.

Relevant Considerations.

7. Before introducing DCOs at Burnham Beeches in 2014, your Committee had to be satisfied that this was a necessary and proportionate response to problems caused by the activities of dogs and those in charge of them. Your Committee

also had to balance the interests of those in charge of dogs against the interests of those affected by the activities of dogs.

8. The test for making a PSPO is set out in section 59 of the Anti-social Behaviour, Crime and Policing Act 2014. The City Corporation may make a PSPO if satisfied on reasonable grounds that activities carried out in a public place are having, have had or will have a detrimental effect on the quality of life of those in the locality, and those activities are or are likely to be persistent, unreasonable and justify the restrictions imposed. The only prohibitions or requirements that may be imposed are ones that are reasonable to prevent or reduce the detrimental effect of the activity. As any remaining DCOs were automatically converted into PSPOs in 2017, it was accepted that the activities identified in the City Corporation's DCOs were capable of having such a detrimental effect, and that the restrictions imposed were capable of being reasonable.
9. Under section 60 of the Anti-social Behaviour, Crime and Policing Act 2014, PSPOs must be reviewed every three years to ensure that they are still necessary. If the City Corporation is satisfied on reasonable grounds that a PSPO will continue to prevent the occurrence or recurrence of the detrimental activities identified in that order, **or** an increase in the frequency or seriousness of those activities, the PSPO can be extended for up to three years. There is no limit to the number of times that a PSPO can be reviewed or extended.
10. In deciding whether to extend the period for which a PSPO has effect, and if so for how long, the City Corporation must have particular regard to the rights of freedom of expression and freedom of assembly set out in articles 10 and 11 of the European Convention on Human Rights – although it is not considered that the PSPOs at Burnham Beeches infringe upon those rights in any significant way. Regard should also be had to the Enforcement Protocol approved by your Committee in order to ensure a fair and consistent approach to enforcement. This Protocol, previously approved by your Committee in 2017, would remain in effect if the PSPO's were extended.
11. DEFRA guidance also states that local authorities should look to provide other suitable dog walking areas in the locality, where restrictions are in place, although dog walkers are not banned from the 'dogs on leads' area. They are simply required to put their pets on a lead that may extend to up to 5 metres in length, whilst in this area. Access is available to them as for all visitors, to all other areas of Burnham Beeches excluding a very small part around the café. The City Corporation also provides 220 acres at Burnham Beeches and a further 200 acres at Stoke Common where dogs can be off leads. This more than adequately meets both the guidance and animal welfare requirements.
12. Each year Officers have reported to this committee, evidence of the need for and effectiveness of, the existing PSPOs at Burnham Beeches in maintaining a reduction in the seriousness and frequency of associated antisocial activities.

Fixed Penalty Notices

13. PSPOs are enforced by the use of Fixed Penalty Notices (FPNs) and/or through the Magistrates' Court. FPNs can only be issued by officers who have been appropriately authorised. It is proposed that the officers authorised will be the Burnham Beeches Rangers who are currently responsible for enforcement of the PSPOs.
14. It is recommended that the Director of Open Spaces is given delegated authority to authorise officers as and when necessary, for example following any change of staff. Your Committee granted such a delegation prior to the introduction of DCOs, in November 2014 and again in 2017 when they were converted to PSPOs and extended for three years. However, for the avoidance of doubt, your Committee is asked to confirm that this delegation includes the new PSPO arrangements.
15. The Rangers, along with all other staff at Burnham Beeches, will maintain relevant training to maintain their detailed understanding of legal and operational issues. This again demonstrates your Committee's commitment to good practice.
16. It is also necessary to set the level of the fixed penalty for breach of a PSPO and any discount for early payment. It is recommended that the amount of the fixed penalty for breach of a PSPO is set at £80 - reduced to £50 if paid within 10 days. This reflects the current position for PSPOs.

Outcome of the Public Consultation exercise.

17. A public consultation exercise was carried out to meet the statutory requirement set out in Section 72 of the Anti-social Behaviour, Crime and Policing Act, 2014 to carry out the necessary consultation, publicity and notification prior to making a decision.
18. There were 5 elements to the public consultation exercise:
 - i. Farnham Royal Parish Council, Burnham Parish Council and Buckinghamshire Council were formally notified of the proposal and their opinions sought.
 - ii. The Chief of Police for Thames Valley and the Police and Crime Commissioner were actively engaged and their opinions sought.
 - iii. The Burnham Beeches and Stoke Common Consultative group were actively engaged and their opinions sought as to the proposal.
 - iv. A wide range of statutory and non- statutory organisations, social activity groups, animal welfare specialist, local schools and businesses were actively engaged and their opinions sought as to the proposal.
 - v. The general public, local communities and visitors were actively engaged and their opinions sought.
19. Methods of engagement included:
 - vi. Public notices in the local press (4 newspapers),
 - vii. Emails to relevant individuals and organisations setting out the proposal and appropriate background information
 - viii. Posters advertising the consultation exercise on site based notice boards and in surrounding villages and libraries
 - ix. Web site links to all documentation
 - x. Active promotion on social media including Facebook and Twitter

- xi. Burnham Beeches and Consultative Group meeting to discuss the consultation outcome.

Consultation results.

20. Thirty four individual or organisational responses to the consultation exercise were received. A breakdown of those 34 responses is shown below: **Appendix 1.**

1.

- Order 1 - 100% support to extend the PSPO for a further three years
- Order 2 – 100% support to extend the PSPO for a further three years
- Order 3 – 94% support to extend the PSPO for a further three years
- Order 4 - 100% support to extend the PSPO for a further three years
- Order 5 – 100% support to extend the PSPO for a further three years

21. The following organisations supported the proposals to extend all 5 current PSPOS for a further three years:

- i. Farnham Royal Parish Council
- ii. Burnham Parish Council
- iii. Police and Crime Commissioner
- iv. The National Trust – owner of neighbouring open spaces that manages a shared audience with Burnham Beeches
- v. The Burnham Beeches and Stoke Common Consultative Group

22. Individual members of the BBSC Consultative Group were consulted on the proposal and a meeting was held with the Group on 18th August where the outcome was discussed. The collated responses from Consultative Group members showed 100% support for all five Orders to be extended for a further three years.

23. The following organisation supported the extension of Orders 1,3,4,5 but not Order 2 (Dogs on leads at all times) for a further three years:

- i. Buckinghamshire Council (BC)

BC asked that consideration be given to reversing the areas covered by Orders two and three. Your committee has previously considered this request (2017) when the Superintendent advised that the suggestion would cause more problems than it solves. As an example, dogs would have to be kept on leads as soon as they arrived on site or when let out of the car. This that would require close monitoring and present challenging enforcement issues.

Options

24. The processes and audiences described in paragraphs 18-23 exceed the statutory requirements and guidance provided by DEFRA. Those consulted are either legally required or are generally recognised as otherwise connected to the site and therefore appropriate to consult.

25. The consultation exercise demonstrates that the consultees support the proposal for all existing PSPOs at Burnham Beeches to be extended for a further three years.

26. Members are asked to consider the following options:

Option 1. Based on the outcome of the recent notification, publication and consultation exercise, extend the existing PSPOs commencing December 1st 2020 and until 30th November 2023.

Or

Option 2. Do nothing.

- a) If Members decide to do nothing, then the PSPOs will expire on 30th November 2020. The site would revert to the pre 2014 situation at Burnham Beeches whereby the Orders listed in paragraph 5 would no longer apply and officers would have to rely upon local byelaws for enforcement at Magistrates Court. The current byelaws require only that a dog:
 - i. Must have a collar and tag
 - ii. Must be kept under effective control.
- b. All other anti-social behaviour by dogs and their owners would be governed by a dog walker's voluntary code of conduct, which had, over many years proved ineffective and extremely difficult to enforce.
- c. As a result and given the robust nature of supporting evidence, it may be reasonably assumed that there would be a substantial increase in dog fouling on the National Nature Reserve and the return of large groups of dogs under the responsibility of a single person .
- d. Further, the exclusion zone around the café currently provided by PSPO 4 would disappear thereby re-exposing the café to hygiene issues and customers to unwanted interactions with dogs.
- e. Similarly the 'dogs on lead at all times' zone provided by PSPO 2 would cease to exist thereby removing the opportunity for visitors to avoid direct contact with dogs and exposing a significant area of the National Nature Reserve where wildlife on the NNR currently thrives, to poorly controlled dogs.
- f. In respect of Orders 1 – 5, there are therefore considered to be reasonable grounds to conclude that the activities prohibited by the PSPO's would recur if the restrictions were no longer in effect. It is further considered that this would give rise to detrimental impacts, as outlined above.

Evaluation and Proposals

27. As reported to your Committee on 6 July, the effectiveness of the PSPOs has been continually monitored and the results of the monitoring have been reported annually. The monitoring has indicated a dramatic, long-term, reduction in dog-related incidents. Members are asked to take these findings into account. As the need for the PSPOs is perceived to be ongoing, and as nothing in the responses to the necessary notification, publicity and consultation required under the ABCP Act 2014 indicates otherwise, and as responses support the continuation of the existing PSPOs then **Option 1 is the recommended approach.**

Corporate & Strategic Implications

The proposals help deliver the aims of the Corporate Plan 2018 – 2023

- **Contribute to a flourishing Society**
- **Shape Outstanding Environments.**

They also support the Open Spaces Department's objectives and outcomes, in particular:

Open spaces and historic sites are thriving and accessible.

- Our open spaces, heritage and cultural assets are protected, conserved and enhanced
- Our spaces are accessible, inclusive and safe
- Our habitats are flourishing, biodiverse and resilient to change

Spaces enrich people's lives

- Nature, heritage and place are valued and understood (3)
- People feel welcome and included (4)

Business practices are responsible and sustainable.

- Our practices are financially, socially and environmentally sustainable (5)

Implications

28. **Table 1** outlines costs to deliver the necessary PSPO notification, publicity and consultation at £8,500 i.e. £1000 less than the estimate provided in the July report to this Committee. All costs are being met from local risk budgets:

Table 1 – Costs.

Activity	Cost
Management time	£1,500
Staff Training (refresher, yet to be delivered)	£1,000
Administration (set up)	£1,000
Advertising costs (Public Notices)	£5,000
Total estimated costs	£8,500

Conclusions

29. It is considered that there are reasonable grounds to conclude that a PSPO will continue to prevent the recurrence of the detrimental activities prohibited by the PSPO's. The results of the formal consultation exercises indicate a high level of support for the City's proposals to extend the existing PSPOs for a further three

years.

Appendices

- Appendix 1 – Collated Consultation Responses
- Map 1.

Background Papers

- July 2020 EFCC 'Decision report' Extension of existing PSPOs at Burnham Beeches – approval to consult
- July 2017 EFCC 'Decision report'. Proposal to extend the use of DCOs as PSPOs at Burnham Beeches.
- September 2014 EFCC 'Decision Report'. Dog Control Order proposals

Andy Barnard


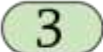



Superintendent, The Commons

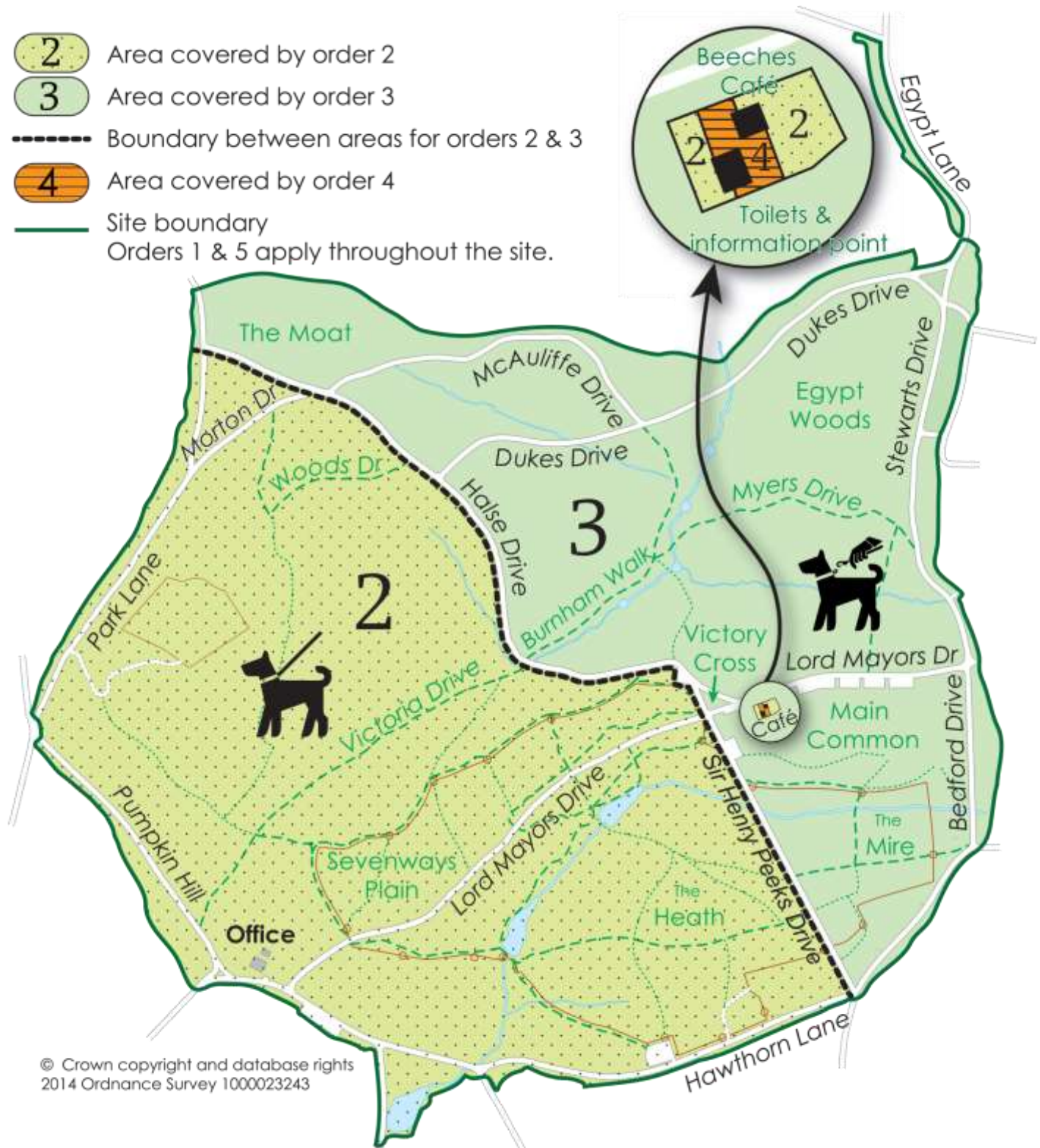
E: andy.barnard@cityoflondon.gov.uk

APPENDIX 1. PSPO CONSULTATION RESPONSES. 2020					
Comments from - required Audience	Order 1	Order 2	Order 3	Order 4	Order 5
BUCKS COUNCIL (inc formal notification)					
POLICE AND CRIME COMMISSIONER					
Comments from Appropriate Audience					
FPC (inc formal notification)					
BPC (inc formal notification)					
HERTS ORIENTEERS GROUP					
Comments from BBSCCG - Collated/ Anonomised					
	15	15	15	15	15
Comments from individuals - Anonomised					
KW					
DM					
DT					
HC					
EB					
KC					
JE					
JB					
JJ					
GT					
BL					
OJ					
DL					
TW					
TOTAL % 'support response'	100%	94%	100%	100%	100%
34 responses in total					
Key					
Against					
For					

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Burnham Beeches Public Spaces Protection Orders map

-  Area covered by order 2
 -  Area covered by order 3
 -  Boundary between areas for orders 2 & 3
 -  Area covered by order 4
 -  Site boundary
- Orders 1 & 5 apply throughout the site.



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Committee(s)	Dated:
Epping Forest and Commons Epping Forest Consultative	07 09 2020 21 10 2020
Subject: Epping Forest - Superintendent's Update for July 2020 (SEF 20/20)	Public
Report of: Colin Buttery, Director of Open Spaces	For Information
Report author: Paul Thomson – Superintendent of Epping Forest	

Summary

The purpose of this report is to summarise the Epping Forest Division's activities across July 2020.

Of particular interest was the decommissioning of the Temporary Mortuary Facility at Manor Flats; attempts to stage 65 Spontaneous Social Gatherings and Unlicensed Music Events on Forest Land as the COVID-19 measures continued to be eased; survey work identifying some 169 low-level Oak Processionary Moth caterpillar nests in Epping Forest; the use of green-hay techniques to re-establish wood pasture sward in Bury Wood; commencement of a trial of GPS managed cattle collars to direct hefting; a 64.6% increase in rounds played at Chingford Golf Course accompanied by 651% rise on online bookings and the completion of the Chairman's responses to the DEFRA Environmental Land Management Consultation and the Epping Forest District Council's (EFDC) Green & Blue Infrastructure Strategy consultation.

Recommendation

Members are asked to:

- Note the report.

Main Report

Staff and Volunteers

1. The management of COVID-19 measures continues to dominate the work activity of staff, with very welcome additional support from volunteers who returned to support roles.
2. Staff recruitment is current subject to vacancy management while measures are undertaken to mitigate the loss of income over the current financial year.

Budgets

3. The impact of COVID-19 costs and restrictions on Local Risk budgets has contributed to a significant projected loss in income. However, the return of public participation in Golf from 19 May and the DCMS approval of comprehensive action plans for Cricket and Grassroots Football, for July and August respectively, indicates that some income streams can be partially restored. The rental waiver extended to selected tenants, and the need for significant extra hours in the Keeper and Litter Picking teams, together with the cost of disposing of unprecedented amounts of waste, will oblige further in-year savings, or the development of new income streams, to reduce the projected overspend.

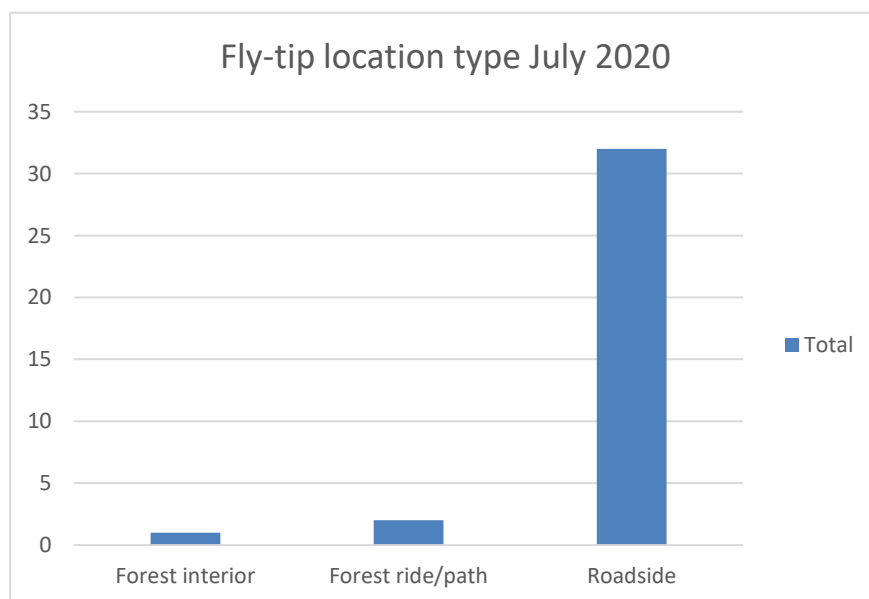
Weather

4. July saw a total of 11 days rainfall spread throughout the month. There was a total of 42.2mm of rain. The average temperature for July was 17.08 degrees Celsius

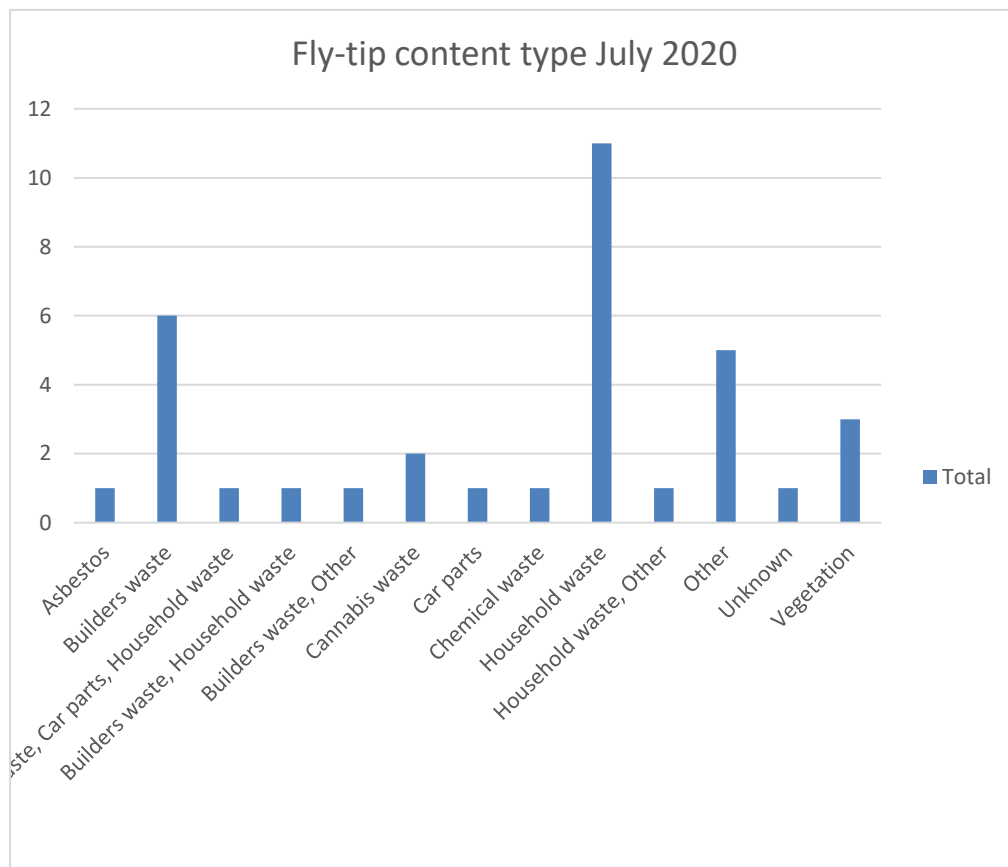
Forest Services

Fly Tipping

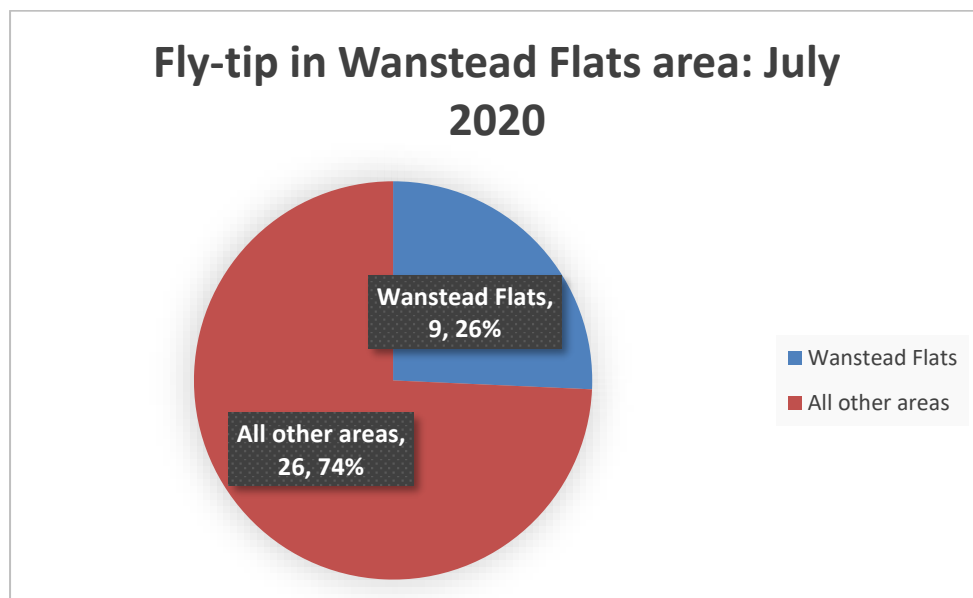
5. There were a total of 35 fly-tips recorded over the period of July 2020, this represents a 27% decrease over the same period in 2019.



6. Roadside locations represented 91% of the tip locations over the period.



7. Household waste represented the largest category of items tipped over the period at 14 (40%), while builders waste represented 9 tips (26%).



8. There were nine fly-tips in the Wanstead Flats area over the period which represents 26% of all tips. Three of these tips were on Centre Road and four on Capel Road.

Enforcement Activity

9. No Environmental Protection Act prosecutions took place during the period under report due to COVID-19 court restrictions. There are two EPA Trials, one EPA Hearing and seven Bye-Law Hearings pending. One written warning and one conditional caution of £80 was issued during the period under report.

Licences

10. A total of 17 licences for events were issued during the month being reported, which yielded an income of £9,007.40 plus VAT. 34 licences were issued during the same period in 2018/19 (income of £27,408.54).

Unexplained Deaths

11. There have been no unexplained deaths during this reporting period.

Rough Sleepers

12. There have been a total of 5 Rough Sleeper camps on Epping Forest:
- Bushwood – Waiting to be cleared
 - Buckhurst Hill – Waiting to be cleared
 - Genesis Slade Theydon Bios – 02/07/2020
 - Snaresbrook – Cleared 12/07/202
 - Whipps Cross Rd – Waiting to be cleared

Unauthorised Occupations

13. There have been no traveller incursions over this reporting period. There have been 51 Spontaneous Social Gatherings and 14 Unlicensed Music Events on Forest Land.

Dog Incidents

14. During the period there have been 4 reports of dog-related incidents over this period.
- 1 x Bushwood
 - 1 x Wanstead Park
 - 1 x Connaught Water
 - 1 x Gilbert Slade

Deer Vehicle Collisions

15. There were 2 reported Deer Vehicle Collisions (DVC) during this reporting period.
- 1 x Woodredon Hill
 - 1 x unknown location

Heritage; Landscape and Nature Conservation

Biodiversity

16. Under consent from Natural England, green-hay spreading has been undertaken by the Conservation Team, working with our hay-making contractor, across three sites within Bury Wood. Hay was cut by the contractor and then collected from several diverse grass swards on the Forest

and blown onto marked plots using the in-house tractor-drawn cattle-feeder / bedder.

17. Green haying is a technique developed a couple of decades ago for the restoration or creation of grasslands using local sources of seed. The hay has to be spread on the day of the harvest and as the spread hay dries this allows the ripe seed to fall onto the new ground but protected by the hay.
18. Additionally, the great advantage green hay as a seed source is that it allows the collecting up of seed that could not otherwise be easily obtained by other seed-harvesting techniques. This allows the spread and seeding of species which might not normally be available in commercially available conservation seed-mixes.
19. In this case the work is being carried out as a trial to demonstrate the effectiveness of the green-hay technique in a wood-pasture situation rather than the normal grassland or open land site. The aim is to enhance the recovery of the sward in wood-pasture restoration sites which have been under the heavy shade of over-grown Hornbeam pollards for more than 100 years and where the seed bank of the open-grown species will have become depleted or lost. The trials will last 3 years and focus on areas that are due have pollarding and canopy reduction works.
20. At Warlies Park, the “new hay meadow” that was created from scratch by the sowing of a wildflower seed-mix 13 years ago, has now developed into a very important site. Not only have the wildflowers firmly established themselves and developed into significant population sizes, with Bird’s-foot Trefoil and Lady’s Bedstraw the most prominent, but the insect populations that are supported there have become important. In addition to supporting hundreds of visiting pollinators, like bees and solitary wasps, the population of the Meadow Grasshoppers (*Pseudochorthippus parallelus*) and Roesel’s Bush-crickets (*Metrioptera roeselii*) was amongst the densest of any site in the Forest or Buffer Lands this year. Two other orthopteran species were also present.
21. At a time when insect species are under considerable threat the Buffer Lands are providing significant additional habitats in the countryside around the Forest, fulfilling one of the key roles that the City Corporation envisaged for them at the time they were acquired.

Agri-environment Schemes

22. During the month, the Rural Payment Agency (RPA), having made amendments to the long-delayed agreement for the proposed 10-year Countryside Stewardship Scheme (CSS), requested further documentation in relation to the commoners’ rights. With the assistance of the City Solicitor a detailed legal document was prepared to respond to the RPA request.
23. Nonetheless, this period also saw continuing work on tenders for contracts with further detailed development of specifications carried out with the assistance of City Procurement.

Environmental Land Management

24. The City Corporations detailed response to the DEFRA consultation on the future content of the ELMS was completed on 30 July (Appendix 1).

Grazing

25. During July, 10 Global Positioning System (GPS) cattle collars arrived from the Norwegian company *Nofence AS*. We are trialling the ability of collars to keep cattle hefted to particular areas along with 5 other sites in the UK before a full UK rollout is undertaken. We are still working closely with Natural England, DEFRA and APHA to ensure that data from the trial and new animal welfare evidence is made available to them to help shape future legalisation and potential grant funding for this technology. There has been great interest in this trial from others and many contacts for more information have been made.
26. This technology could have large positive impacts on how we graze the Forest and reduce labour resources associated with managing the current buried transmitter wire invisible fencing network (*Boviguard®*), which has now been in use for 10 years.
27. As part of the grazing programme this year we have allowed large areas of the grazed grasslands on the Forest to mature and flower in full before grazing. This is part of a management approach that allows for year-to-year variation in the grazing regime to ensure as a variety of conditions for recovering plant species, often in low densities, in this continuing restoration phase.
28. At the end of the month 21 cows began grazing the wood-pasture of the Bury Wood / Fairmead area within the existing *Boviguard®* system invisible fence area. Using the new *NoFence* technology, another 7 Cows were de-pastured for grazing the heathland of Sunshine Plain south and its linked heathy wood-pasture areas of Wake and Rushey Plains. Elsewhere on the Forest 10 cows with calves began grazing the fenced area of Fernhills.
29. Hay cuts have been taken across our land holding for winter feed. Due to the exceptionally dry months of April and May, yields are around 30% down on last year.

Heritage

30. There was no additional work carried out on heritage issues during July.

Contractors

31. The de-commissioning of the Temporary Mortuary Facility (TMF) at Manor Park Flats, part of Wanstead Flats began this month. Several meetings were held with the contractors running the site to ensure a smooth transition back to open Forest Land and to agree the restoration works. A hand-over site inspection was carried out on 30 July to ensure that the site had been cleared of any debris or left-over rubbish and that the ground conditions were suitable for restoration work to begin in August.

Land Management

Town & Country Planning – Local Plans

32. Local Plans work continued with your Committee's approval for the Chairman's response to the Epping Forest District Council's (EFDC) Green & Blue Infrastructure Strategy consultation. The letter was sent out on 13 July (see Appendix 2).
33. On 15 July attention was turned to London and the SAC Mitigation Strategy with a meeting convened by your officers with Greater London Authority (GLA) and Natural England Officers. The aim of the meeting was to agree a way forward to achieve a unified approach to suitable alternative natural greenspaces (SANGs) and to seek the GLA's assistance in bringing the London Boroughs together to agree to signing up to an updated Memorandum of Understanding.
34. These issues were not resolved, and a further meeting was held with Natural England (NE) on 30 July to explore the next steps in agreeing a London "SANGS" approach, which NE is describing as a "toolbox" of options. Further work by City Corporation officers is likely to be needed to make progress on this part of the SAC Mitigation Strategy.

Town & Country Planning – Development Control

35. Comments were submitted to EFDC planners on just one application in July objecting to the development of housing at Thornwood Rugby Club, and further comments were sent to the Planning Inspectorate in response to an appeal for Newstead, 19 Coopersale Common, Coopersale. There were no developments in the London Boroughs requiring comment at this stage.

Land Registration

36. Dialogue was initiated with the London Borough of Redbridge (LBR) with the intent of reintegrating the former Western Sewage Works at Hatch Forest, Chingford as part of the Forest, following its compulsory purchase in 1885. Initial feedback from LBR appears favourable that the land is of no operational value to them, so disposal is likely to be recommended.

Operations

Insurance works

37. Three new public liability claims were received during the period. Two were related to tyre damage caused by the alligator teeth at the car parks and one concerning a branch falling from a tree and damaging a car and injuring the occupant. Monitoring and maintenance works on the alligator teeth are all up to date and typically an insurance payment is not made. On further investigation the tree that hit the vehicle was not on Forest land, though the fallen branches had been deposited on our land.
38. EF staff and the insurance team held a periodic review of claims management and outstanding claims in July. Currently there are 36 insurance claims

outstanding against EF with a total claim value of over £1.6 million. One outcome of the review was that paying for mitigation works, such as installing a root barrier, was clarified as a Local Risk budget item. Recently we have been successful in defending claims, however, there are potentially a few claims in the pipeline where root barriers will be proposed, and these could result in significant additional local risk budget expenditure.

Risk Management Works

39. Oak Processionary Moth (OPM) (*Thaumetopoea processionea*): Overall staff and contract surveyors identified 188 OPM low-level nests on 108 trees requiring removal. During July staff removed 74 nests from 48 trees and contractors removed 114 nests from 60 trees. The presence of OPM on Oak trees is increasingly impacting arboricultural works with some tree works having to be delayed until additional equipment can be hired in to aid in the safe working of the trees.
40. Tree safety: Tree safety works continue, however, as raised in the May-June 2020 Superintendents report, we have a substantial backlog of works following the COVID Lockdown period and these will not be completed within the planned timetable. Staff received a 48-hour response task to complete on a large Poplar in the Churchill Avenue at Woodford Green which required the felling of the tree. This is a further indication on the declining condition of this prominent avenue previously reported to your committee. The backlog of work following COVID-19 Lockdown has meant the proposed avenue regeneration works have had to be delayed until September 2021, however, some arboricultural work will be required on at least 8 trees this year.
41. Reservoir management: The delayed six-monthly inspection visit by the reservoir inspecting engineer was undertaken during the period. No significant additional maintenance works were identified. Arborist staff have been preparing a BS 5837: 2012 Tree Assessment for works report for the reservoir safety works proposed for the dam at Deer Sanctuary for the Department of Built Environment. The tree work proposals for the dam were talked through with the Consulting engineer and the trees proposed for felling were agreed. The grass cutting maintenance work on the reservoirs overall is a little delayed this year due to the impact of COVID-19 on staffing levels.

Access Works

42. Path verge cutting commenced in July with work focusing on the main access routes in the Forest.
43. Staff and contract grass cutting across the Forest has also progressed during July in-line with previous years activities on this annual task. Additional areas were also put out to contract and, for example, Woodford Green was cut by our contractor for the first time this year.

Visitor Services

44. Visitor centres at High Beach and Chingford have remained closed throughout July, while work was undertaken to prepare Chingford for opening in August.
45. During July 'pop-up' visitor centres were trialled at both Wanstead Park and High Beach, on both weekends and weekdays. Engagement numbers with visitors indicated that High Beach provided the best use of staff time both on weekdays and weekends. The cargo bike from a previous project at Wanstead Park was re-used for this trial.
46. Numbers of visitors who engaged with the pop-up offer, have ranged from 13-52% of the visitor numbers to all visitor centres during the same period in 2019. Engagement with visitors at the pop ups has however, been steadily increasing; from 48 interactions on 18 July to 122 on 2 August.
47. Work to enable the re-opening was completed by August and the visitor centre at Chingford is open for 3 days a week while also offering continued 'pop-up' visitor centres at both High Beach and at Barn Hoppitt to engage with other visitor groups.
48. The visitor services team have also continued with litter picking as well as visitor counts at various locations. The final counts have now taken place and data has been sent to contractors for analysis against historic data. Observational surveys also took place during July, running alongside an online survey promoted through social media. The online survey returned nearly 500 responses. While there is still the need for further analysis of this the headline results so far are:
 - Over half of respondents (56%) indicated that they are visiting Epping Forest more frequently currently compared to pre-lockdown.
 - 27% are visiting just as often as before and 13% are visiting less.
 - 16% of respondents said they visited at least once a day prior to the lockdown, compared to 31% visiting at least once a day now.
 - 44% of respondents have visited new sites/areas for the first time since the start of lockdown.
49. The Queen Elizabeth Hunting Lodge hosted a wedding on 4 July, the first day legally permitted. The happy couple had an enjoyable day, if somewhat different to the one they imaged when booking. The team worked in collaboration with the registry office to ensure that all government guidelines were followed and that guests had an enjoyable and safe day.

Museum and Heritage

50. Whilst the heritage venues have been closed, staff have been researching the people and keepers living in and around the Forest from the c.16th yielding interesting information about who lived at Queen Elizabeth Hunting Lodge. This will be used to create more informative interpretation around the costume on display at the Lodge. In addition, research was undertaken regarding slaving links to Epping Forest place names as part of a review of naming conventions.

51. Work on the connection of the records and other documents housed in the National Archive has taken place to allow more efficient work once those public records re-open for use.

Learning

52. Throughout July, the learning team have continued to be proactive in reaching schools, communities and families in need, including children with limited access to resources such as computers and outside space. Activity sheets were designed so that children could create something themselves at home and a bespoke Epping Forest heritage activity was developed to enable children to explore the Forest's fascinating history from home or school. The activities were shared via community networks including 8 Waltham Forest community centres and a Waltham Forest food distribution centre for vulnerable families, as well as over 800 schools. The team continued to produce a series of videos which inspire children to be active in nature through activities such as bug-hunting and eco art, which is a valuable resource for learning in the school grounds. Resources can be found here: <https://www.cityoflondon.gov.uk/things-to-do/green-spaces/learning-programme-resources>.
53. Over July, the team planned and prepared a series of facilitated nature activities for families in Epping Forest, ready for launch at the beginning of August.

Chingford Golf Course

54. The high volume of visitors continued throughout July with a total of 4,334 rounds compared to 2,633 for the same period last year: an increase of 1701 or 64.6%. Early start times continued to be limited to allow ground staff to be able to get ahead of play to continue to carry out course maintenance work which included regular cutting schedules for the greens and tees, strimming overgrown areas, irrigation repair work to pop ups and weekly spraying on the greens to help the improve putting surface quality.
55. Total revenue from online sales was £28,145.00 Total revenue from reception was £81,768.05, broken down into:

Breakdown of figures from Reception for July			
	2020/21	2019/20	Difference (+/-)
Green fees:	£73,880.87	£13,162.23	+£60,718.64
Drinks:	£813.80	£850.00	-£36.20
Hire Equipment:	£3697.50	£3417.50	+£280.00
Shop Sales:	£1972.70	£1484.60	+£488.10
Wanstead:	-	-	-
Horse Riding:	£1403.18	£525.29	+£877.89

56. Online bookings for the same period last year was £3,751.00 compared to £28,145.00 this year, an increase of £24,394.00 or 651% - all bookings continue to be pre-booking over the phone or online only. Total income from reception last year was £31,750.58. Overall income for this period last year amounted to £35,501.58 compared to £109,913.05 this year, an increase of £74,411.47 . The high increase for this period is because a 9-month season ticket was reintroduced from 6 July (and run until 31 March 2021). This income is ordinarily shown in April for the full 12-month season ticket.

Wanstead Flats

57. The increased litter picking duties continued from the high volume of visitors along with the unofficial raves across the Flats. Essential goal mouth renovations were carried out along with goal posts restoration works in preparation for a return for football in September.

58. Work to stop unofficial organised events on the flats has been ongoing, working alongside the Forest keeper team. Licencing procedures recommenced and work to renew licences/ get new users licenced started.

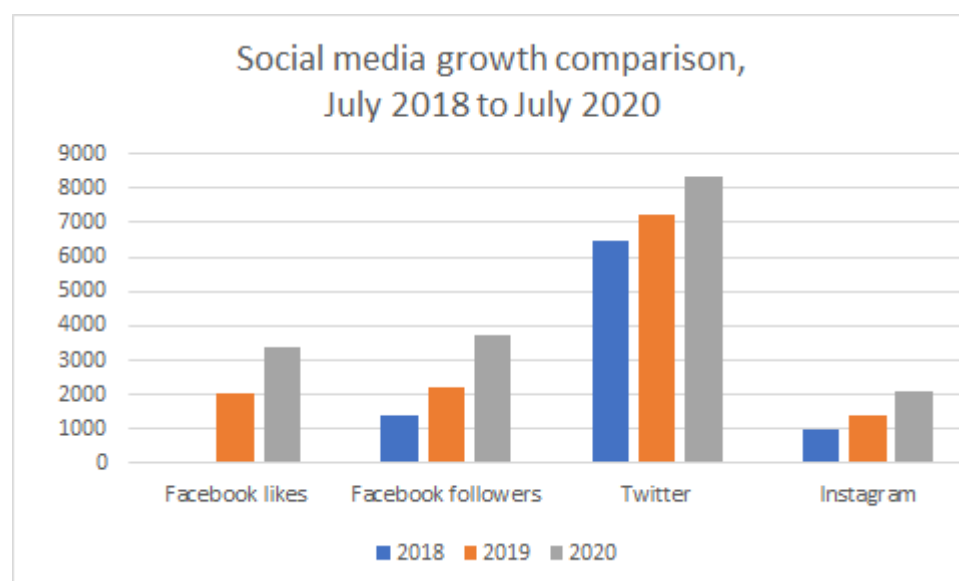
59. Parkrun is still not in operation due to COVID-19.

Communication and Information

60. As of 5 August 2020, Epping Forest social media following is:

- Twitter followers: 8330 8117 (15% increase)
- Facebook followers: 3709 (a huge 66% increase)
- Instagram followers: 2111 (52% increase)

61. The chart shows a comparison of our figures at the same point in 2018 and 2019:



62. As stated in the previous report, instead of a summer edition of Forest Focus, Forest Focus is being updated via mail chimp monthly. The July edition went out just before the summer holidays and included details of how to enjoy Epping Forest as a family, some information beech tree habitats, the purple

emperor butterfly as well as a reminder that fires / barbecues are not permitted in the Forest, and to take litter home.

63. The Top Tweet for July 2020 with 8,633 impressions related to a litter pick following an illegal rave in Bury Wood, Chingford.

64. The top Facebook post for July 2020 with 19,632 people reached was also relating to the clean up after the rave in Bury Wood.

65. The top Instagram post for July 2020 was a photograph of a beautiful pink sky sunset over Connaught Water from 31 July, with 257 likes and a reach of 1,543 people.

66. New codes of conduct have been promoted with three released this month. A generic code of conduct, along similar lines to the Countryside Code, and more specific codes of conduct aimed at dog walkers and cyclists.

Major incidents – COVID-19 National Health Emergency

67. Specific responses to the national health emergency are included in the body of this report.

Appendices

Appendix 1 - Environmental Land Management: Response

Appendix 2 - RESPONSE to the EPPING FOREST DISTRICT COUNCIL GREEN & BLUE INFRASTRUCTURE STRATEGY CONSULTATION – JUNE/JULY 2020

Paul Thomson

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Response ID ANON-6JAU-FMG5-5

Submitted to **Environmental Land Management: policy discussion**

Submitted on **2020-07-30 11:05:50**

Introduction

1 Do you want your responses to be confidential?

No

if you answered yes to this question please give your reason :

2 What is your name?

Name:

City of London Corporation

3 What is your email address?

Email:

sally.gadsdon@cityoflondon.gov.uk

4 Where are you located?

Please select:

London

5 Who are you?

Please select:

Land manager

Please specify:

consultation questions

6 Do you have any comments on the design principles on page 14? Are they the right ones? Are there any missing?

Please leave your comments below:

On point (d) - The group of eligible applicants needs to be broadened so that owners and managers of peri-urban areas (Metropolitan Green Belt, Sites of Importance for Nature Conservation) are fully encompassed, which may include public bodies that manage public open spaces outside of their statutory duties, given the greater need of these places for public health and as a result of greater use resulting from the legacy of COVID-19. It would also serve to link in with public health strategies. Nature and access to a beautiful environment are essential for people's well-being. There are significant opportunities within agri-environment schemes to provide for access-related public health programmes providing a valuable link to the Government's wider public health agenda.

On point (f) - The need to work with/support land owners to help resolve issues in delivering the desired outcomes and therefore to move away from financial penalties as the first response to non-delivery, is required.

There is a need to have the ability to adapt management through the term of agreement in response to changes in the environment, habitats and species. The current rigid structure of a 10 year CSS agreement does not allow this; much can change over this period.

7 Do you think the ELM scheme as currently proposed will deliver each of the objectives on page 8?

Please leave your comments below:

The objectives would be delivered, the question is at what scale will the scheme be taken up. If the scheme is not designed correctly nor the payment rates optimised then the magnitude of change enacted by ELM will be very low because of the low number of applicants.

8 What is the best way to encourage participation in ELM? What are the key barriers to participation, and how do we tackle them?

Please leave your comments below:

To encourage high uptake of the scheme the application/scheme burden/barriers need to be reduced/removed:

- Timing
 - o Currently the application process takes place from early spring to mid-summer – the busier time for farmers and land managers. Change this to starting in early autumn. The time lines for various elements such as seeking planning permission, getting 3 quotes for actual cost items, filling in forms are too condensed to be able to make an application. If the initial application was online then an online form could flag up what land owners needed to plan to do during the rest of the year to complete their application (created as an auto-generated application plan).
 - o There is only one opportunity to apply each year. This should be increased to at least twice a year, or ideally entry throughout the year, this would encourage uptake because there is less time to wait until the next window. The one application entry per year puts too much pressure on Natural England advisors.

- o Releasing the information on the payment rates a long way in advance of the launch of ELM to give land managers plenty of time – ideally 1 year beforehand - to consider and plan.
- Funding
 - o there is a balance between value for money and the incentivisation of the payment rates to encourage uptake. This needs to be determined.
 - o Payments that are not inflation-linked. When a 5 or 10 year agreement is entered in to the payment rates pay for less work/compensate land owners less over time. This can make things very difficult for land owners and this experience might put applicants off.
- Flexibility of the scheme
 - o The current CS scheme is too rigid in the rules and there is no ability to change management over time as the environment, habitats and species change. Often the management for the habitat is tailor to fit the rigid rules of the scheme rather than to suit the habitat, this skews management away from optimal towards meeting grant rules.
 - o Expansion of subject specific stand-alone grant schemes – Distinct and focussed grants such as the Hedgerow and Boundaries Grants Scheme have proved to be popular and deliver good value for money. DEFRA should consider the development of further easily accessible subject-specific environmental schemes that fulfil a range of public good objectives.
- Complexity of scheme
 - o As much simplification as possible is required, it is very difficult for applicant when the scheme has so many rules and requirements, the CS Higher Tier grant handbook is 172 pages.
 - o There shouldn't be a separate application stream for woodland grants to the rest of a grant application as there is no in CS, which involves a separate process and paperwork. There should be one ELM application and the Forestry Commission, Historic England and Natural England all input where relevant.
- Land owner chosen commitments – some applicants would prefer shorter agreements, and some would prefer longer agreements. Applicants could choose from a pre-set of agreement lengths.
- Change in inspection focus – there is a significant worry amongst applicants and agreement holders about the implementation of financial penalties over inadvertent mistakes/errors in delivering complex schemes/administration processes. Most land owners want to achieve what they sign up for. It would be more encouraging if the focus of inspections move towards supporting problem solving on-farm at the point of inspection compared to written reports after inspection where the agreement holder/claimant has no opportunity of asking questions and discussing the situation.
- Burdensome/problematic RPA administration
 - o One of the main barriers is confidence in the RPA to administer the scheme efficiently (forms going missing, lack of confidence in advice being given, slow payments). In addition, there is a significant worry amongst claimants and applicants of making inadvertent errors in application or claims which are treated disproportionately, and RPA staff are not given discretionary decision making powers to be flexible in dealing with these errors. The scheme would attract more applicants if the RPA stated they would be more flexible on dealing with errors in paperwork.
 - o Too many different forms – mixture of paper and online submission makes it unnecessarily complicated
 - o It is extremely difficult to get advice from the RPA helpline, the staff are fantastic and do their very best but they don't know the schemes or the guidance documents mostly and call back times from specialised teams take a long time or aren't returned. The RPA teams need more resource and training. ELM applicants need to be assigned an RPA case officer so they can seek guidance from them during their application process because Natural England can't give advice now, and it is more effective to have an ongoing dialogue with one person rather than starting back at the beginning with the help desk every time an applicant has a question.
 - o Emails, letters and other documents like remittances need to have more details on them because the standard text is sometimes of no help. Remittance advice letters do not always show enough detail to work out what the remittance is for.
 - o Submitting evidence and other information – many people's emails can only send up to a certain amount of Mb per email, there needs to be a way of uploading evidence to an RPA website rather than emailing it over or posting. This could also apply to various forms, so they are uploaded to an SBI account rather than emailed in to the general helpdesk to assign appropriately.
 - o Paper work is not processed on time/in a timely fashion. This can impact on, and put at risk, the delivery of things such as capital works (our own current application is still being processed 7 months after the intended agreement start date). Therefore, the applicant is penalised for the RPA's insufficient capacity to process applications and this increases the risk to the applicant of failing to meet the required deadlines. Why would an applicant want to put themselves in that position?
 - o The difficulty in amendment rural land parcels – this is extremely time consuming taking many years sometimes to correct the RPA's mapping errors. The RPA needs to be able to accept GIS files from claimants, and also provide an online system for mapping corrections by claimants.
 - o Remote inspections using aerial photography should only be used where it can be used as unequivocal evidence. It cannot be used where there is canopy cover, e.g. to determine eligibility for the Direct or Pillar 2 payments or their equivalents. These cannot always replace on-farm inspections.

9 For each tier we have given a broad indication of what types of activities could be paid for. Are we focussing on the right types of activity in each tier?

Please leave your comments below:

The split in activities between the tiers appears appropriate generally.

In Tier 1 it is important that grass and herbal leys are included in soil management and that hedges, ditch margins and woodland edges are included in field margins. Tier 1 seems very similar to the content of ELS and mid-tier CS. Recognising the climate and biodiversity crises and the huge part contribution of farming to both, ELM needs to be a step change. Entry of farmers into Tier 1 needs to be based on their signing up to a diversity of measures on farm, such as a mixture of crop diversity, land management practices, on farm habitats, not solely a lot of one/few measure(s). The application requirement needs to be based on a sufficient diversity environmental offer to make a difference.

If Tier 2 includes recreational areas, funding should not only be restricted to infrastructure but much wider measures to support the management of recreational areas, given the legacy that will come from COVID-19. The importance of open space for health and wellbeing is one of the strongest legacies from COVID-19 and should be recognised in the development of the ELM scheme.

There appears to be a large emphasis on restoration and habitat creation, and not as much on ongoing management. There have been changes between successive previous schemes where one funded restoration of a particular habitat and then the scheme did not fund ongoing management, so the restoration work was not maintained. One example is for traditional orchards where there was funding for planting under HLS but funding in CS for managing newly planted orchards. Furthermore, restoration grants need to be available to the land owner across successive scheme agreements as for many habitats restoration cannot

be achieved in a 5-10 year agreement, and if applicants only have the option of choosing a much lower paying management option following having had a restoration option in a previous agreement, it might de-incentivise the applicant from continuing with management, which wouldn't be the best use of funding to have paid for the restoration. Often there is a lot of follow up work following restoration which is more than just ongoing management.

There needs to be the ability to have multiple tiers in one agreement.

10 Delivering environmental outcomes across multiple land holdings will in some cases be critical. For example, for establishing wildlife corridors or improving water quality in a catchment. What support do land managers need to work together within ELM, especially in tiers 2 and 3?

Please leave your comments below:

ELM seems to put a lot of emphasis on working with neighbours which seems like a great idea unless the neighbouring land owners are uncooperative or not interested. This could be a role for Natural England to work with key land owners/managers to encourage their participation. This might be in the form of increased financial incentives (perhaps by paying for consultants to prepare an application) or investing more time to make these joint workings happen. However, currently Natural England do not have sufficient resource to deal with their own workload, let alone engage in new activities, so they would have to be properly resourced.

11 While contributing to national environmental targets (such as climate change mitigation) is important, ELM should also help to deliver local environmental priorities, such as in relation to flooding or public access. How should local priorities be determined?

Please leave your comments below:

County-level priority statements, similar to the National Character Areas used for CSS, that have incorporated details from designated sites, local BAPs and Biodiversity Opportunity Areas, received input from local Natural England, Historic England, Environment Agency and the county council, but which is supplied to the main county natural history and historic groups, and district and parish councils to seek input to ensure important overlooked features are not missed.

Identification of local priorities must be done after an appropriate landscape assessments recognising of historic landscape and valuable ecological elements of the landscape, particularly where habitat creation is proposed. Habitat creation must fit in with the natural historical ecology and landscape characteristics to prevent inappropriate landscape changes, both ecologically and culturally.

Whilst ELM has strong regard for landscape-scale management, the process to identify local environmental priorities is key for ensuring small highly valuable sites are not overlooked. Some of these sites can contribute ecosystem and biodiversity features in far greater levels compared to comparable areas of some landscapes.

There are now several environmental schemes / strategies - ELMS, Biodiversity Net Gain, Nature Recovery Network Plans, Carbon Credits, Sustainable Alternative Natural Greenspaces. Perhaps applicants need to be advised a year before application on what would be the best route for the land owner and the government's targets.

12 What is the best method for calculating payments rates for each tier, taking into account the need to balance delivering value for money, providing a fair payment to land managers, and maximising environmental benefit?

Please leave your comments below:

Start with an ecosystem service analysis. There is now probably sufficient data on the financial contribution of various services such as pollination, margins to prevent pesticides entering water courses etc. to calculate the financial value of those services. Rank the different measures to identify which ones provide the greatest value of their combined services. Then undertake a similar analysis of the biodiversity improvement potential that these measures can provide because the biodiversity crisis needs to be equally tackled. For this the Defra metric v2.0 (used for Net Gain) could be used which would have the benefit of aligning ELM with Net Gain policy, however I believe it would be better to develop metric v2.0 further to have a tool that is able to deal with greater habitat specifics and condition. These two scores would be combined and the results would need to be weighted based on their regional contribution. This would therefore identify which measures are most beneficial. I think the methodology needs to be created by academics, and develop metric v2.0 further.

The income to growers from the replacement of BPS with Tier 1 needs to be bolstered by the public paying more for food. See response to question 13.

Another important balance to strike is the payment rate differences between restoration and ongoing management options. Payment for ongoing management, compared to restoration grants, can be very low. This might de-incentivise applicants to a successive scheme from managing habitats that have been restored because the payment rate is insufficient to carry out follow up work from the restoration phase. Perhaps there should be a middle option which sits between a full restoration payment and a lower ongoing maintenance payment.

13 To what extent might there be opportunities to blend public with private finance for each of the 3 tiers?

Please leave your comments below:

Green finance is becoming well established. The need to address consequences of climate change and the biodiversity crisis are well known now. The green finance sector is becoming well established, and there is a growing commitment from business. Tier 1 lends itself to private investment by the food sector and water industry; Tier 2 lends itself to UK businesses including developers; Tier 3 lends itself to investment by large national and global businesses. All three tiers would be suitable for carbon and biodiversity credits to be bought in any amount by private individuals and businesses of any size.

But throughout all of this, the public needs to start paying more for food and less healthy food needs to be taxed more. Nudge behaviour towards healthier eating and British food security will save money on health care, assist the British economy and supplement the funding of public goods. But there needs to be support for families on low income families. There needs to be a stronger supermarket ombudsman which needs to review farming contracts between growers and supermarkets.

14 As we talk to land managers, and look back on what has worked from previous schemes, it is clear that access to an adviser is highly important to successful environmental schemes. Is advice always needed? When is advice most likely to be needed by a scheme participant?

Please leave your comments below:

- Advice is not always needed. An (?self) assessment at the beginning of the application process could determine the applicant's need for advice rather than taking each applicant through the same process steps, which can waste time for the agency and applicants who are experienced land managers and agents. If experienced land managers and agents know the sites better than Natural England staff, NE could focus on helping less experience applicants.
- In CSS for SSSIs, where there are different people staffing the SSSI Responsible Officer and CS Advisor roles, both are required to input on many elements, this can be double handling, one or other should be sufficient for each item. A central application portal where applicants, ELM Advisors and SSSI Responsible Officers and other parties such as Environment Agency (Catchment Advisors), Historic England, Planning Officers can view and complete tasks related to the application, this would be much more efficient.
- For experienced land managers the advice needs are on navigating the scheme, understanding application requirements and deadlines rather than land management itself.
- Natural England have kept an internal Q&A on CS Scheme elements. If this was more widely available to applicants this could reduce avoidable contact to the RPA and Natural England.
- Advice needs for experienced land managers would also centre on:
 - o Tailoring objectives (ELM consultation document page 8 bullet point b) for the habitat
 - o issues with slotting more complicated habitat types/sites into set options
 - o The need to reasonably amend an agreement as habitats, species and the environment develop over time.
- If CS advisors are more involved they need time to visit sites properly – there need to be more capacity at Natural England to help applicants with ELM. Natural England keep a list of potential future applicants, it would be more efficient for applicant and advisor if the applicant can be advised/guided on preparation they can do before the application year, because the January to August application window is too short resulting in rushed applications. ELM will be more tailored, so even more time will be required to consider the proposals.
- There needs to be more clarity within Natural England on the guidance about the measures that are funded to avoid time required during application development on seeking guidance. This is especially prevalent for 'in between' habitats that site firmly neither in one habitat nor another. CS advisors should be given greater autonomy to make their best decisions and some rigidity needs to be taken out of the scheme's system.

15 We do not want the monitoring of ELM agreements to feel burdensome to land managers, but we will need some information that shows what's being done in fulfilling the ELM agreement. This would build on any remote sensing, satellite imagery and site visits we deploy. How might self-assessment work? What methods or tools, for example photographs, might be used to enable an agreement holder to be able to demonstrate that they're doing what they signed up to do?

Please leave your comments below:

There are two elements to this: doing the work; monitoring the results.

Doing the work

How this could be recorded - examples:

- Photographs of work done held for inspection.
- Annual claim for work done.
- Other easy to record metrics such as number of grazing days or new pollards made.

Monitoring the results

This need to be simple, such as scoring sheets which are tailored for each feature at application the stage. For example:

- ponds - % south side of pond shaded; % water area populated by desirable water plants
- bracken - % cover
- habitat structure – fixed photos, but the number of these needs to not disproportionately disadvantaging land managers with large areas of complex habitats
- weed burden/prevalence – approx. size of patch or % cover on interest feature
- veteran tree health score – start and end of agreement
- soil organic matter – start and end of agreement
- spray records
- water meter readings for water storage
- fixed point photography and video recordings

Species surveys are difficult and time consuming. The CSS BEHTA is done by Natural England; Natural England do not have capacity to record the results of ELM. Small amounts of funding could be given to local natural history groups via contracts to deliver this service. These groups tend to undertake this activity anyway at their own costs, so low-level funding could pay for training for members to expanding the pool of people and the experience held to create a wider network of recorders. The species surveys mostly do not need to require expertise, but an easier level of knowledge and is therefore achievable. This funding could be part of an ELM agreement where the land owner pays the natural history group directly.

In practice, land managers with more diverse and complex large scale habitats are disproportionately disadvantaged as recording becomes unwieldy and is a barrier to enter the scheme or the level of commitment taken up in the scheme. There needs to be a way to reduce the burden for larger owners with more complex sites.

16 Do you agree with the proposed approach to the National Pilot? What are the key elements of ELM that you think we should test during the Pilot?

Please leave your comments below:

The priority should be number 3, the scheme mechanics, because if a well funded scheme is not designed, or it is overly complicated or burdensome, there will be

the low uptake as seen in CSS, and then there'll be limited return on numbers 1 and 2 if the scheme is not taken up in sufficient quantity. The easier the scheme is to apply and to deliver the greater the application of this scheme across the land and a chance at a meaningful change. The key elements of number 1 that need rigorous testing on a large range of land owner types, including larger land owners with varied habitats are:

- realistically how long does it take to apply;
- realistically how long does it take to gather the evidence recording work done and results seen;
- how many applicants can be handled by Natural England (is this the bottleneck?) – it can be impossible for one advisor to process all the application documentation in CSS for a large and complex site in one application year;
- how to automate the scheme more so that more can be done by the applicant autonomously – greater direct input such as online mapping for the equivalent of BEHTA mapping, setting of prescriptions; auto generated lists of the evidence required to be kept;
- rigorous testing of the IT system; including a system that automatically updates when RLR parcels change – not requiring human input – where the ELM scheme maps are interactive with the RLR parcels – changes in RLR parcels affect amount of ELM options in each one which are very time consuming to check and change manually. Self tailoring options.
- Developing the part of the ELM scheme that deals with commons administration. Currently the RPA are not fully set up to deal with CSS and BPS commons applicants, and commons applicants are significantly inconvenienced in dealing with the administration:
 - o CSS applications and claims cannot be submitted online
 - o RLR information cannot be seen for common land most of the year
 - o Much of the guidance for CSS and BPS does not cover how the processes differ for commons, so either an applicant finds out by accident or has to spend a long time waiting for the RPA to confirm what the correct procedure is

Number 2 is the second priority, if the scheme is not prohibitive to apply and enter, I believe all land owners will be interested in funding, even if it is relatively low. But if the payment rates are too low, the mindset is that the rates are not attractive enough to tempt people in to the scheme. I suggest focus groups for number 2 to gauge this financial threshold.

It is critical that there is a sufficient number of pilot to robustly test the scheme and that the full range of applicant groups (nature conservation organisation, national park, farmers, charities, other land owners etc) are sufficiently represented in number.

17 Do you have any other comments on the proposals set out in this document?

Please leave your comments below:

It is important not to launch ELM prematurely because if the scheme does not run smoothly all the same concerns with CSS, BPS and HLS will be raised and potential applicants may be put off applying. A backlog may also be created which might not be able to be cleared. It is critical that the IT system works and as much can be done via an online system (not via email or post) as possible.

Payment by results or outcome based payments – the payments from ELM should not be purely results-based because there are often factors outside of the control of the land manager. It is the National Audit Office's view that while its supporters argue that, by its nature, Payment by Results offers value for money, these contracts are hard to get right, which generates risk and cost for commissioners. Payment by Results potentially offers benefits such as innovative solutions to intractable problems. If it can deliver these benefits, then the increased risk and cost may be justified, but this requires credible evidence. Without such evidence, commissioners may be using this mechanism in circumstances to which it is ill-suited, to the detriment of value for money (NAO 2015).

Similarly, Natural England's Result-Based Agri-Environment Payment Scheme (RBAPS) started in 2017 have demonstrated that while environmental performance may increase, the lack of efficient systems for administering outcome-based schemes is a major drawback. Consequently, management costs have been found to be high and the evidence base on how to achieve preferred outcomes is at best uneven. Outcomes-based systems can be subject to confounding factors such as weather; disease and pests, which may form part of the outcomes-based risk, can unduly influence the success or failure of a scheme.

Results should be able to be multifactorial, such as improvements in: biodiversity, carbon sequestration and other ecosystem services such as water retention and shade. Different management techniques on different habitats can deliver varying degrees of benefits, therefore there needs to be some standard calculators to base payments on. Standard payment rates for set outcomes need to be carefully thought through because sites differ in their natural diversity/environmental state and have varying legacies of environmental impact. Furthermore, outcomes happen at different timescales at different sites and those timescales sometimes cannot be influenced. Sometimes, outcomes simply do not happen despite textbook land management, for reasons outside of the land manager's control.

There needs to be an ability to buffer the effects on payments due to external factors such as weather, pests, force majeure issues (fires).

Methodologies for assessing outcomes/results will need to be provided to the applicant before applying to scheme to get a sense of what is achievable before committing resources to making an application.

An applicant with both SSSI and Scheduled Monuments on the site can find themselves between advisors from Natural England and Historic England being "held to ransom" by both parties demanding particular items to part of the application or they will refuse to sign off on the application. This makes it especially difficult for land owners as the scheme payment rates do not cover the cost of the works, so they are forced into taking on a greater financial burden for the sake of trying to obtain valuable funding to support land management. It is not possible to meet everyone's wish list.

In addition to matching payments to market rates, for management that is not linked as tightly to markets, payments need to match inflation as under CSS the payments rates are static for 10 years in some cases which makes delivery by the applicant increasingly difficult.

Squirrel and deer control need to be available for more habitats than woodlands, including wood pasture and other relevant habitats.

In the Discussion document, the section 'Determining what we pay for' (pg. 32) has "beauty, heritage and engagement", this is a miscellaneous collection of important public goods which deserves specific definition and single enunciation. Though not a well-recognised term under the European Landscape Convention: Florence Convention (2000) to which the UK is a signatory, natural beauty is a statutory component of legislation protecting the landscape of Natural Parks and Areas of Outstanding Natural Beauty (AONBs) An earlier manifestation of the term is seen in the 'natural aspect' landscape definition used to protect many of the

City Corporation's common-land based landholdings secured for public benefit in the 1870s. The notion of the Convention's 'Landscape Quality Objectives' and DEFRA's previous work on 'National Landscape Areas' (NLAs) would in the City Corporation's view represent a separate and defined public good that would be worth inclusion in the consultation documents primary outcomes list. Similarly, in the same way that NLAs help define aesthetic character that is a source of local character, regional pride and tourism revenue, the interplay between heritage and the landscape is again worthy of definition as public good.

Crops, tree, plant and pollinator health does not seem to be covered by ELM. The protection of key elements of the English countryside is an extremely complex area which requires a concerted approach by Government. The expansion of international trade; the connectedness of the European plant trade and climate change have together substantially increased England's exposure to a range of Invasive Non-Native Species (INNS), zoonoses and pathogens which now pose real dangers for crops; livestock and trees, together with native biodiversity. From pests and diseases affecting most major English hardwood trees to the out-competition of the English white-clawed crayfish by North American and European counterparts, England's biodiversity faces new and growing threats. The protection of England's biome is a fundamental public good which requires a range of measures including greater public awareness; improved research; expanded control measures and accurate monitoring to improve the overall response to species protection. Defra and the grant schemes should be more joined up with other initiatives, including those by the non-governmental sector. For example, the B-Lines initiative of BugLife, although indirectly supported by the agri-environment scheme options could be linked much more directly and the urban initiatives integrated in the funding alongside the more traditional farmland projects.

Tranquillity should be included as a public good. Previous research by the Campaign for the Protection of Rural England (CPRE) and the Countryside Agency have mapped Tranquillity Areas across England to help emphasise the importance that the role of quietness and access to dark skies areas contributes to public health and relaxation. Visitor Surveys at the City Corporation's Charitable Trust for Epping Forest continue to underline that access to tranquillity, especially the presence of the natural world, is a primary reason for seeking access to Open Spaces. Agri-environmental schemes have a key role to play in perpetuating the protection of tranquil rural areas and especially the peri-urban fringe. There is however a wider role for Government to play in perpetuating Tranquillity through Planning controls and transportation initiatives. Tranquillity represents a much under estimated and under played public good which deserves greater emphasis in future agri-environment strategies.

Consultee Feedback on the Online Survey

18 Overall, how satisfied are you with our online consultation tool?

Satisfied

Please give us any comments you have on the tool, including suggestions on how we could improve it. :

Be able to format text - bold, underlined, bullet point formatting.

Also to be able to make the text window bigger for viewing/editing.

Chairman, Epping Forest and Commons Committee

Graeme Smith



Councillors John Philip and Nigel Bedford
Epping Forest District Council
High Street
Epping
CM16 4BZ

Telephone 020 8532 1010

Date 8 July 2020

Dear Councillors Philip and Bedford

RESPONSE to the EPPING FOREST DISTRICT COUNCIL GREEN & BLUE INFRASTRUCTURE STRATEGY CONSULTATION – JUNE/JULY 2020

1. We are grateful for a second opportunity to respond to your Council's proposed Green & Blue Infrastructure Strategy (hereinafter referred to as the G&BIS), following our response to you of 2nd March.
2. As we stated in our 2nd March response and in previous correspondence, the implementation and funding of Suitable Alternative Natural Greenspaces (SANGS) are critical to the future protection of Epping Forest Special Area of Conservation (EFSAC). Although our comments cover all chapters and the range of proposals and ambitions contained in this G&BIS document, our overriding concern is with the likely effectiveness of the SANGS Strategy contained therein. Therefore, our comments on the SANGS element of the document form the first and major part of our response and strongly influence our overall conclusions.

Our key concerns are:

3. The G&BIS only sets out a requirement for SANGS associated with the masterplanned developments and there is not enough clarity to provide confidence that the mitigation is fit for purpose for these developments on their own;
4. More widely, there is no SANGS provision for housing away from the masterplanned developments. A clear, comprehensive strategy that provides effective mitigation for the quantum of housing growth is necessary. A wider range of infrastructure, away from the masterplanned developments, is required and needs to be clearly secured;

5. Mitigation measures should be effective, reliable, timely, guaranteed to be delivered and as long-term as they need to be to achieve their objectives. The strategy as drafted does not provide the fundamental information necessary to demonstrate that the Council is able to comply with the Habitats Regulations and would be able to rule out adverse effects on integrity as a result of the housing growth proposed in their plan;
6. There is no clear timetable or governance for delivering SAC mitigation, including SANGS.
7. We suggest that the SANGs component should be a separate strategy, ensuring that the measures that are necessary as mitigation are clearly set out for developers and others. These measures need to be separated from more aspirational elements within the G&BIS so that there is no doubt as to how SANGs will be provided, how they will function and how the legal obligations are fulfilled. Such an approach would provide a much better opportunity for SANGs delivery to be joined-up with neighbouring authorities to provide certainty that the in-combination effects of growth on recreation use of Epping Forest SAC are addressed.

General Context

8. As before in our previous response, the City Corporation particularly welcomes this example of closer cooperation on such an important document, which will form an integral part of the new 15-year Local Plan. We are pleased that our comments of 2nd March were helpful to the process of developing the G&BIS.
9. The G&BIS contains a broad range of positive messages about green space and we congratulate the Council on seeking to take such an ambitious and holistic approach. This approach could help fulfil the ideas of a Green Arc across the District, which is something we and your Council have been supporting over many years.
10. We welcome the fact that SANGS form part of the overall G&BIS package as stated clearly in paragraph (para) 1.20. Earlier, in para 1.3, we consider that this point, that SANGS should not be considered in isolation, needs to be similarly emphasised. However, having made that point, it is vital that SANGs do not become obscured by the provision of “multi-functional” green spaces (the integration discussed at para 1.25) as SANGS have a very specific, measurable function within GI. SANGS must be a ‘ring-fenced’ and clearly identifiable element of this holistic approach, the effectiveness of which, in avoiding adverse impacts on the EFSAC, can be clearly monitored and measured by the competent authority.

11. The provision of the appropriate quantity and quality of SANGS must be the early priority of the G&BIS. We welcome the Council's acceptance of the quantum of SANGS required of 8ha per 1000 residents (para 1.6, Appendix 3) but for a SANGS network to be effective in providing an alternative attraction, to that provided by Epping Forest, there will need to be large, additional semi-natural open spaces (>30ha) amongst any network.

A SANGS Strategy

Hierarchy of planned provision

12. The City Corporation in its evidence at the Examination-in-Public (EiP) (representations on Matters 1 & 4 and Matter 16) and in its letters of 24th July 2018, 14th September 2018 and 28th November 2019 has reiterated its concern that the mitigation hierarchy, for the protection of European sites under the Habitat Regulations 2017 (as amended), must begin with **avoidance** measures rather than relying on on-site mitigation (SAMMS).
13. It is, therefore, a matter of concern to the City Corporation that in the context-setting paragraphs 1.27 to 1.30 a hierarchy of SANGS delivery within a coherent SANGS Strategy is not set out. This concern is reinforced by the SANGS guidance in Appendix 3 which, although covering much ground around the characteristics of different types of SANGS, does not make a clear commitment to such a strategy.
14. For SANGS funding and delivery the current draft of the G&BIS seems, instead, to be reliant on four masterplan developments. In the context of other SANGS Strategies for European sites, such as for the Thames Basin Heaths or the Dorset Heathlands, these would be described as "bespoke" SANGS, designed around specific private developments. They should form only part of any network. In addition, we have significant concern that even these masterplan sites, apart from Latton Priory, do not seem to have room to accommodate the size and quality of SANGS required to provide effective avoidance measures for EFSAC.

Strategic SANGS

15. In a SANGS Strategy for EFSAC there needs to be, in our view, the provision of a network of different SANGS that provides a range of visitor experience and recreation opportunities. To rely on the four masterplan locations (as set out in of the G&BIS Appendix 2) feels very much like all the eggs are in one basket. We would like to see strategic SANGS that serve multiple, scattered and smaller housing developments. Paragraph 1.15 of Appendix 3 of the G&BIS seems to recognise this requirement but does not go on to set out how this might be achieved. There is also the need, in our view, to anticipate a likely regional requirement for SANGS (see below), which may need to be considered outside the G&BIS but which should form part of a SANGS strategy through the Duty-to-Co-operate.

16. Of the housing within the current recreational Zone of Influence (Zoi) of 6.2km, around 2,500 homes are planned outside the current master-planned areas (not including any windfall sites) and yet these developments are not being required to contribute towards the provision of SANGS. Furthermore, there is not a mechanism for the provision of SANGS for such developers and therefore it is not clear how these developments will be able to come forward and be compliant with the Habitats Regulations. For wider growth away from the large sites, strategic SANGs will be necessary. These would be expected to be managed by ownership or by agreement (with commuted sums) by the local authority as competent authority or by other parties, provided a legal agreement for in-perpetuity management is in place. Such provision would allow the Council as competent authority to respond to changing pressures and feedback from monitoring of the visitor patterns and behaviours across the District.

Third-party SANGS – existing greenspaces

17. It is also likely, given the land ownership distribution, that there will also need to be clearly identified existing 3rd party greenspace sites or “buffering” sites close to the Forest, like Copped Hall south and Warlies Park. There is nothing in the current G&BIS draft that examines how existing greenspaces could contribute to the requirement for 8ha per 1000 housing units that is proposed as the correct measure of SANGS provision in the document. If such existing greenspaces are to be included in the SANGS network, clear evidence would need to be provided to show a meaningful contribution to the uplift of capacity equivalent to the 8ha per 1000 residents required by a SANGS Strategy. In addition, and as importantly, the protection of the existing heritage and wildlife interests of these sites would have to be clearly demonstrated to ensure net gain. To do this a clear framework of delivery of SANGS across the District and the wider region is required (see regional coordination section below).

SANGS tariff

18. The corollary to the above hierarchical or network approach to SANGS is that these sites need to be funded through a mechanism that allows for provision across the District in the most appropriate and effective locations and allows for in-perpetuity support for the management of the sites. Funding could be achieved through collection of a tariff or CIL contribution, as a fully-functioning, developing network of SANGs cannot be tied to a single development. This is a key issue that we have raised repeatedly over the last two years since the Regulation 19 consultation. However, the current draft of the G&BIS remains unclear about how GI enhancements and SANGS provision outside the masterplan areas will be funded. Paragraph 1.4 of Appendix 4, for example, skirts the subject and avoids mention of a tariff but offers no effective alternative mechanism.

Management in-perpetuity

19. In addition to tariff monies there needs to be clear guidance on how SANGS will be managed in-perpetuity and specific funding mechanisms need to be identified by the G&BIS or a separate SANGS Strategy. Any such mechanisms and management need to fit closely with the provision of SAMMS and to be flexible enough to adjust in response to changes in housing allocations and any visitor use patterns over time.

Regional coordination – duty -to-cooperate

20. The G&BIS, through its provision of SANGS, will become an important component of the Epping Forest SAC Mitigation Strategy. This Mitigation Strategy remains to be agreed across the relevant London and Essex authorities and will need to address the regional requirement for SANGS. Something of this regional requirement should be recognised in the G&BIS in the form of the supply of Strategic SANGS in the hierarchy of planned provision (see paras 15 and 16 of this letter above). At present, the recognition of this likely regional requirement is missing from the G&BIS and we hope that this can be discussed between the competent local authorities, Essex County Council and the GLA in the near future.

Appendices: the new G&BIS appendices, SANGS and EFSAC Mitigation

Appendix 1

21. Of the projects listed under this Appendix, none, apart from perhaps movement and wayfinding, appear to have any SAC Mitigation potential.

Appendix 2 “Bespoke” Masterplan SANGs – lack of certainty about provision

22. Appendix 2 of the G&BIS sets out to describe the details of the SANGS and GI provision for the four Masterplan sites in turn. However, although there are many good ideas for enhancement of surrounding countryside areas and for improving connectivity between sites contained in this Appendix, there does not seem to be any clear proposal for provision of the SANGS, other than at Latton Priory (part of one of the four masterplan areas).

23. For example, it is not clear if there is sufficient hectarage, unoccupied by housing allocation, within Water Lane, Waltham Abbey, North Weald or Epping South for SANGS to be accommodated. Also, the characteristics of the proposed SANGS are not defined and their locations are not mapped.

Water Lane & Latton Priory

24. We remain concerned about how a semi-natural SANGS of meaningful size and quality can be fitted into the 2,100-house Water Lane (para 1.6 of Appendix 2) masterplan area. This site seems to be over-reliant on existing green space, such as Epping Forest Land at Epping Long Green (paras 1.11

and 1.12) but no discussions have been held with the City Corporation about this and no mechanism for funding enhancements or additional protection for wildlife features have been proposed. The two component woods of Harlow Woods SSSI, pressure on which was highlighted as a significant concern at the Local Plan EiP, also seem to remain vulnerable to increasing demands for recreational space.

25. In the meantime, the CROW Act 2000 open access land at Nazeing Wood Common, to the immediate west of Water Lane and mentioned in passing at para 1.10, seems to provide a significant opportunity for SANGS to be provided by your Council through management agreements with 3rd party land-owners, just as such arrangements have been made elsewhere in the UK. This area of common land also seems to present a great opportunity for biodiversity enhancement as expressed clearly in the G&BIS in Chapter 3 at para 3.54. However, such an approach does not seem to be proposed and no action seems to have been taken, presumably due to the lack of a SANGS Strategy outside of the masterplan areas.
26. It also is somewhat puzzling that in this G&BIS document, that an opportunity has not been taken to map the full extent of the SANGS being offered at Latton Priory. In the Latton Priory consultation document (<https://www.lattonpriory.co.uk/pdf/latton-priory-2020-update.pdf>) it makes clear that additional land is available and the map on page 8 of the developers' consultation document shows this additional land as a key and integrated part of the SANGS offer. These two pieces of land to the south-east and south of the site are not shown on the maps on pages 72 & 74 of the G&BIS (Appendix 2) and yet make up around 40% of the green space on offer. Even for this masterplan area there has been no decision about the extent of SANGS.

North Weald

27. For North Weald there is no clear indication (paras 2.6 and 2.27) of what the SANGS offer might look like for this 1,050-house development. There seems only to be an aspiration to create a SANGS alongside Merlin Way, which would presumably incorporate the existing green space of the flood alleviation scheme, but no map of its likely extent is provided.
28. There is also in paras 2.2 – 2.6 a clear desire expressed to increase the visits to the semi-natural and other important woodlands to the south of the site. As para 2.4 states, these sites would need careful management to protect their current wildlife interests but in the absence of a SANGS tariff it is not clear how such work would be paid for nor how 3rd party landowners could be engaged. Of concern to the City Corporation, however, is the lack of acknowledgement of the likely increased pressure on Epping Forest SSSI at The Lower Forest.

29. Although The Lower Forest lies on the other side of the M11, the main road to Epping passes underneath the motorway and would connect the new residents of North Weald with this existing large open space, only 1.5km to 2km from their homes. On heavy boulder-clay soils, similar to those at Hatfield Forest National Nature Reserve (Uttlesford District), and with a very limited infrastructure this site could suffer increased impacts, including loss of ride-side vegetation and soil loss along similar lines to the damage recorded at Hatfield Forest since its increased local residential population at Takeley in Uttlesford.

Waltham Abbey

30. Similar to North Weald this site seems to have little detail of the location and the extent of the SANGS proposed for the masterplan area. Enhancements suggested for nearby existing habitats (para 3.20) are very welcome, particularly given the ecological importance of the Cobbins Brook valley and catchment, but sources of funding are unclear as already stated above. Forest Land at Aimes Green and its green lanes lies close by as does the City's buffer Land at Warlies Park but no specific proposals are made in relation to the protection or enhancement of these sites, other than some outline ideas in Appendix 4 for Warlies Park.

Epping South

31. The quality of any Epping South SANGS, even if the hectareage could be provided, must be open to considerable doubt given its proximity to the M25 and a major electricity pylons route (para 4.5 of the G&BIS). There is no detail provided of where a SANGS could be provided of sufficient scale and quality. The northern boundaries of the site are proposed for enhancement (para 4.16) and while this is a welcome proposal to enhance edge habitats it does not add up to a SANGS. Even the proposal to use the PROW network to the east of the site (para 4.17) to enhance recreational opportunities inevitably leads towards development in the form of the large M11-M25 Junction. A concern is raised here that, as with North Weald (paras xx – xx), there seems to be an over-reliance on existing PROWs and linear routes (para 4.12) to provide access for recreation rather than additional new recreational spaces that would provide SANGS, which would need to be achieved by negotiation of agreements with neighbouring private land-holders or through proposed land purchase.

32. The more attractive PROW route for any Epping South development would seem to be south of the site and the bridge across the M25 motorway. This is referred to a number of times in relation to it as a route to the EFSAC. While we welcome the recognition in para 4.15 of the problems that might arise by this route directing additional recreational pressure onto the EFSAC there is no solution offered, other than enhancement of the eastern PROW network, the problems of which are outlined above. Furthermore, there is no acknowledgement of our concern, made in response to the Regulation 19 consultation and in a representation to the Examination-in-Public (EiP) about

the protection of the City's Buffer Lands at Great Gregories, which are an essential part of the EFSAC Grazing Strategy and, thereby, to the management of the EFSAC's favourable conservation status. The likely very large percentage increase in visitor pressure on this site immediately across the footbridge from the proposed Epping South development would be likely to lead to increased conflicts with the grazing operation and certainly to increased costs in protecting and managing the facilities there.

33. In the current G&BIS it is not clear that how SAC mitigation will be delivered. Ultimately, as a competent authority relying on the SANGs to deliver the mitigation for the growth in your plan, it is fundamental that your strategy provides the confidence that SANGs can be delivered and provide effective mitigation. Given the importance of the SANGs components, there is perhaps merit that this should be much more clearly separated out in the strategy, so that the legal requirements to deliver mitigation are not lost in the more aspirational elements of the strategy.

Appendix 3 SANGS Guidance

34. Some of this guidance sets out important general parameters, including in para 1.2 for example *"it will not be acceptable to simply offer a field nearby for dogs to be exercised"*. The guideline in paragraph 1.17 is also welcomed, that additional recreational activities could be to the detriment of wildlife interests on a site of ecological importance, and this is particularly relevant to Appendix 4 and any proposals to enhance existing sites for SANGS purposes (see further comments below).
35. However, in para 1.2 the approach set out concerning the integration of the SANGS into the new built developments is a significantly limiting constraint, one which would probably only work to attract residents from within the new developments. If this were to be the case the SANGS would not fulfil a strategic role. Connectivity with the surrounding landscape, therefore, is most important and although this is highlighted in Appendix 2 in its discussion of the four Masterplan sites, and also referenced in para 1.15 of Appendix 3, the lack of SANGS details and location maps make it difficult to assess whether it would be achievable.
36. Moreover, the connectivity seems aimed at the new residential development itself and allowing its residents to move away from the site rather than attracting others into the Masterplan SANGS. And while making connections to the PRoWs would be positive (para 1.24, Appendix 3), the SANGS need to be large enough in their own right, for dog-walking for example, and narrow paths (para 1.25) would not accommodate off-lead dog-walking or allow dog-walkers to avoid other activities (e.g. cycling).

37. Paragraph 1.3 offers the prospect of a Landscape Framework through a Memorandum of Understanding with the masterplan developers, but it seems intended only for coordination between the four masterplan areas. If this is the case this seems to be unnecessarily limiting, in our view, and there is, instead, every reason to develop this Landscape Framework into a full SANGS Strategy for the District, encompassing all residential developments and linked to a SANGS tariff and commuted sums that can sustain a SANGS network as discussed earlier in this letter.
38. Paragraph 1.4 seems to hold out the possibility that the SANGS may be broadened beyond the masterplan areas, but this opportunistic approach is not a substitute for a planned SANGS Strategy. Our concerns in this regard are somewhat amplified by paragraph 1.5, which seems to be articulating a project-level approach to avoidance and mitigation. It is this project-level approach that we made representations about at the Local Plan EiP last year.
39. Furthermore, this Appendix does not set out guidelines for the timing and phasing of the SANGS provision, which need to be in place ahead of occupancy of the new residential areas. Para 1.9 proposes that an aspirational Landscape Framework should outline indicative but not necessarily quantifiable benefits and the development of such a framework seems to be some way down the planning timeline and it is, therefore, not clear to us where this might leave the Local Plan and its avoidance strategy.
40. Another concern is the focus of SANGs on dog walkers and walkers (para 1.21). We believe there could be wider scope for a range of different SANG types, for example including cycling. Cycling, particularly mountain-biking, is becoming a key issue for the EFSAC. We note that SANGs-type projects as mitigation in Dorset have included dedicated cycling provision.
41. These details of timing, phasing, minimum areas, quality and shape of the network need to be set out in the checklist in para 1.34 of Appendix 3. The first bullet point in para 1.34 seems to suggest that some SANGS sites, as opposed to general green infrastructure sites, might be smaller than 8ha in size. However, sites smaller than this are unlikely to be effective alternatives to the Forest and the quality of a SANGS is about the size of the sites as well as other features.

Appendix 4 Sites for enhancement

42. This Appendix we consider is both incomplete and too narrow in its focus and does not address the need for a SANGS hierarchy or a coherent network, as raised earlier in this letter.
43. Para 1.19 of Appendix 3 sets some context for existing green spaces which might provide SANGS away from masterplan areas, similar to the 3rd-party

SANGS approaches used in the Thames Basin Heaths SANGS network. However, as para 1.20 of Appendix 3 points out, the nature conservation value of each existing area needs to be assessed carefully so that it would not be damaged by an increase in visitor numbers or any associated infrastructure.

44. In paragraph 1.11, for example, it states that the important ecological features of Roding Valley Meadows SSSI would “*not be affected by increased recreational use*”. However, this seems unlikely given the impact on the hay meadow ecology from trampling of grassland flowers, widening pathways, increased fire risk and impact of increased dog-walking on the grazing activity. Similar issues apply to the City Corporation’s buffer land sites that are highlighted in this Appendix. To accommodate enhanced numbers would require careful design and planning following from monitoring of existing visitor use of the sites.
45. The Appendix also, significantly, omits to mention other key areas that elsewhere, in Appendix 2, are highlighted as places where there are likely be direct impacts from the proposed masterplan sites, let alone the other 2,500-plus houses within 6.2 km of the EFSAC. For example, within Epping Forest Land itself The Lower Forest and Epping Long Greens are not highlighted and yet it is clear from Appendix 2 that North Weald and Water Lane/Latton Priory developments, respectively, are likely to have significant impacts on these existing protected sites. Of the City’s Buffer Lands, Great Gregories is also not mentioned and yet, as highlighted already in this letter, this site could well see a very significant increased visitor pressure should any development at Epping South be approved. We therefore believe Appendix 4 requires much more work and further evidence gathering.
46. Biodiversity net gain is a vital measure of success for future greenspace and for the G&BIS, as this document rightly outlines (Chapter 1, paras 1.13 and 1.42). Therefore, the starting point for considering inclusion of any existing site in the SANGS network, must be whether, given its existing visitor numbers and its existing wildlife interests, it could accommodate an uplift the equivalent of 8ha of new open space per 1000 new residents. For example, while the suggestion made for Jessel Green concerns enhancing access for visitors of restricted mobility, this seems unlikely to make a significant contribution, in terms of the protection of the EFSAC, to the additional 8ha SANGS requirement.
47. The issue of funding for such sites is flagged up in para 1.4, but the necessity of a SANGS tariff, currently used widely by many other local authorities protecting sites of international importance, is ignored. The funding and long-term maintenance for the four sites proposed for consideration on page 103 and in para 1.5, including two City Corporation Forest buffer land sites, is not explained. The types of visitor that these might attract and how any such provision would fit with a wider SANGS network is also not explored in any

detail nor how such consultation might be funded. At this stage, therefore, there is considerable uncertainty as to whether such sites could achieve mitigation for the EFSAC and a significant amount of work is required, including consideration of existing functions of the land, engagement with neighbouring owners (e.g. Copped Hall Trust, Warlies Park House) and information-gathering from existing visitors.

General comments on the G&BIS

48. In Chapter 2 of the G&BIS the housing total for the District of 11,400 new homes is highlighted in para 2.3. As highlighted above, the proposed funding for green spaces (including SANGS) for the District seems to be concentrated at the masterplan areas which encompass 5,890, 51% of these residences. The apparent lack of a mechanism for funding provision for the remaining 49% is of profound concern. Increased pressure on existing open spaces outside EFSAC, including ancient woodlands and grasslands (para 2.7) such as parts of Epping Forest including its green lanes and The Lower Forest, as highlighted above, need a clear strategy.

49. Taking land out of intensive agriculture (para 2.25) and making linkages between important sites (para 2.16) are excellent ambitions and we welcome the broad aspirations of this G&BIS. The Vision at 2.41 is excellent but a concern here is that it may be overly complex making it difficult to bring together the number of threads within it, at least at this early stage in the development of a Strategy for the District. Our concern, as expressed earlier is that this might be to the detriment of a focus on some of the immediate priorities including the implementation of a SANGS network. We consider that a separate SANGS Strategy document is required to resolve this issue.

50. In Chapter 3, we would request caution in the development of multifunctionality or certainly in the idea that individual sites should be expected to be multifunctional. Many sites will only have a single or few priority functions or features to protect. It may not be possible to combine different modes of access, such as cycling and horse-riding. The latter activity often seeks out quieter areas away from cycling hubs. Also commuting routes may detract from green spaces leading to a feeling of busy-ness and bustle (para 3.46).

51. Section 3.5 addresses the Water Environment and we consider it to be very light in detail. Water features are a key draw for visitors and much more could be made of the role of water in enhancing spaces for both people and wildlife. We would welcome a commitment to providing more water-side access, for example in the Roding Valley.

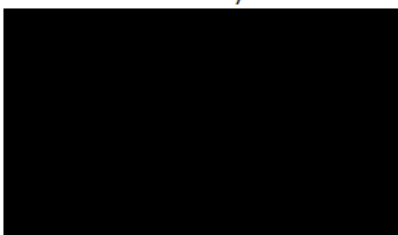
52. We note that tourism is not considered within the G&BIS. Given the commitments made within the submission version of the Local Plan for the tourist economy it would seem important to have more within the G&BIS on tourism. For example, the Local Plan highlights the links between tourism and the environment.
53. In relation to habitat protection and wildlife diversity for the District, we do not agree that natural open space only has value IF “safe and attractive access” is provided (para 3.7). Semi-natural habitats have intrinsic value and also provide important parts of the visible landscape (trees and hedges) and soundscape (e.g. songbirds like Skylarks) or support a core of species that can then populate other more accessible spaces to the benefit of visitors to those places.
54. In Chapter 3 (para 3.16), the idea of engagement through art is an important one and art can be used to convey important messages about the value of a site which can then affect the expectations and behaviour of visitors. It can certainly be influential in shaping opinion as well as engaging and adding interest. We suggest that this section should include a wider focus than just public art, that can be very expensive. Wider focus could include art for engagement, events, festivals etc.
55. In regard to Chapter 4 and Implementation, most of the comments above on a SANGS Strategy cover the key issues about which we have concerns with this Chapter. We are not clear about what is conveyed on the maps at page 54. More detail on these maps about how actual SANGS proposal sites would be used to intercept and attract visitors from different residential focal points (including masterplan areas) would have been helpful at this point. The main concern remains, however, related to *Stewardship* (paras 4.20 – 4.22) and the management, development and long-term protection of green infrastructure, especially a network of SANGS. The mechanisms outlined in this section do not provide us with confidence that such stewardship can be achieved, in spite of the excellent ambitions within the document.
56. Appendix 1 seems to have relatively few projects. We would welcome the inclusion of a project to review existing Public Rights of Way and increase the number of routes, linking existing sites and joining up other Rights of Way. This would fit well alongside the first project (Movement and Wayfinding).

Conclusions

57. We welcome the opportunity to comment on the G&BIS and recognise that it contains many positive measures for both people and biodiversity. We applaud its ambition for a holistic approach to greenspace provision.

58. However, the G&BIS strategy, as drafted, cannot be relied upon as mitigation for the recreation pressure on Epping Forest SAC as a result of the housing growth in Epping Forest District. Mitigation measures should be effective, reliable, timely, guaranteed to be delivered and as long-term as they need to be to achieve their objectives. Epping Forest District Council needs to be able to demonstrate the deliverability of all of the mitigation on which the Local Plan relies because, if the confidence is misplaced and the mitigation does not materialise when required, permission cannot be given for the development provided for by the plan and alternative strategies will need to be developed.
59. SANGs are an essential part of the mitigation package, and yet it would seem that only a restricted proportion of houses coming forward would be linked to any kind of SANGS provision. Even for those houses, the G&BIS, as yet, does not provide sufficient confidence that mitigation has been secured or would be effective. As a result, there seems to be no clear hectarage of SANGS anticipated, no list of SANGS site options and a SANGS tariff requirement is not set out as we believe it should be in this document.
60. For the District, to make progress on the above issues, we consider that there is a need to divorce the SANGS strategy from the more aspirational G&BIS and that a separate, comprehensive, clear and effective SANGS strategy is necessary. This needs to set out the SANGS that will be delivered by developers and also a range of other infrastructure and greenspace provision that would provide for mitigation for smaller sites across a wide area. Detail of how existing sites might contribute to this, how mitigation will be funded and what requirements would be placed on developers need to be clearly set out. The City of London, as Conservators of Epping Forest, remains ready to explore with you how the non-SAC open spaces we manage might contribute to the mitigation required in the District and regionally.
61. More broadly, we remain concerned that there is, as yet, no timetable for the decisions on governance of the SAC Oversight Group which would have an overview of SANGS provision regionally. We believe mitigation will be best delivered if coordinated across local authorities. We see a role for the Greater London Authority in helping facilitate this.

Yours sincerely



Graeme M. Smith BSc(Hons), CISSP, CISM, CRISC, CAPM, CC
Chairman, Epping Forest and Commons Committee

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EPHING FOREST CONSULTATIVE COMMITTEE

Wednesday, 24 June 2020

Minutes of the meeting of the Epping Forest Consultative Committee held remotely at 7.00 pm

Present

Members:

Graeme Doshi-Smith (Chairman)
Deputy Philip Woodhouse (Deputy Chairman)
Benjamin Murphy
Caroline Haines
Judith Adams, Epping Forest Heritage Trust
Gill James, Friends of Wanstead Parklands
Martin Boyle, Theydon Bois & District Rural Preservation Society
Jill Carter, Highams Residents Association
Susan Creevy, Loughton Residents Association
Robert Levene, Bedford House Community Association
Tim Harris, WREN Wildlife & Conservation Group
Ruth Holmes, London Parks & Gardens Trust
Andy Irvine, Bushwood Area Residents Association
Brian McGhie, Epping Forest Conservation Volunteers
Deborah Morris, Epping Forest Forum
Gordon Turpin, Highams Park Planning Group (inc Snedders)
Mark Squire, Open Spaces Society
Tim Wright, Orion Harriers
Carol Pummell, Epping Forest Riders Association
Steve Williamson, Royal Epping Forest Golf Club
Verderer Michael Chapman DL
Verderer Paul Morris
Verderer Nicholas Munday
Verderer H.H William Kennedy

Officers:

Richard Holt	- Town Clerk's Department
Lorraine Brook	- Town Clerk's Department
Paul Thomson	- Superintendent of Epping Forest
Colin Buttery	- Director of Open Spaces
Jeremy Dagley	- Head of Conservation, Epping Forest
Jo Hurst	- Business Manager, Epping Forest
Martin Newnham	- Head Forest Keeper, Epping Forest
Geoff Sinclair	- Head of Operations, Epping Forest
Jacqueline Eggleston	- Head of Visitor Services, Epping Forest

1. APOLOGIES

Apologies were received from Sylvia Moys and Matthew Frith. It was noted that Verderer H.H William Kennedy would be joining the Epping Forest Consultative Committee late.

The Chairman welcomed the new members of the Committee to their first meeting including the Verderers who were elected in February.

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

There were no declarations received.

3. **MINUTES**

The Committee considered the minutes of the previous meeting of the Epping Forest Consultative Committee held on the 29th of January 2020.

RESOLVED- That the minutes of the Epping Forest Consultative Committee 29th of January 2020 be approved as an accurate record.

4. **MINUTES OF THE EPPING FOREST & COMMONS COMMITTEE**

The Committee received the minutes of the Epping Forest and Commons Committee on the 10th of March 2020.

A member of the Committee noted the Committee's thanks to Melissa Murphy for her time serving as a Verderer of Epping Forest.

RESOLVED- That the minutes be noted.

5. **REVENUE OUTTURN 2019/20 - EPPING FOREST AND COMMONS**

The Committee received a report of the Director of Open Spaces on the Revenue Outturn 2019/20 for Epping Forest and the Commons. The report compared the revenue outturn for the services overseen by the Epping Forest and Commons Committee in 2019/20 with the final agreed budget for the year.

RESOLVED- That the report be noted.

6. **EPPING FOREST - SUPERINTENDENT'S UPDATE FOR FEBRUARY TO APRIL 2020 (SEF 13/20)**

The Committee received a report of the Superintendent on the Epping Forest Division's activities across February to April 2020.

RESOLVED- That the report be noted.

7. **EPPING FOREST - SUPERINTENDENT'S UPDATE FOR MAY TO JUNE 2020 (SEF 16/20)**

The Committee received a report of the Superintendent on the Epping Forest Division's activities across May and June 2020.

The Director of Open Spaces explained that COVID-19 remained the biggest issue effecting the management of Epping Forest with an associated estimated 122% increase in visitor numbers based on mobile phone location data.

A member of the Committee asked a question regarding deer collisions with motorised vehicles within Epping Forest, particularly at the Theydon Bois site, noting the problem of dealing with deer who are seriously injured in these collisions. The Director of Open Spaces explained that the Epping Forest Management team were not able to respond to instances of deer collision at this time and were instead being supported by Essex Police. It was added that once the Management Team again had the ability to respond, this service will be reinstated.

Replying to a query from a member of the Committee the Director of Open Spaces clarified that swings present on trees with OPM would be removed for safety reasons.

Following to a query from a Committee member the Director of Open Spaces confirmed that the Deer Strategy review report was ready for review and would be distributed to allow the Committee to comment.

Responding to a question raised by a member of the Committee the Director of Open Spaces explained that temporary traffic restrictions at High Beach had been established to reduce issues caused by the increased visitor number travelling by car caused by COVID. It was noted that there were mixed feelings from the public on these traffic restrictions and that the Traffic Regulation Order review would consider the best way forward on this issue. A member of the Committee commented that he, and the other Verderers, had been in contact with the Epping Forest Management team throughout the implementation of these traffic restrictions and would be willing to receive any further comments from the Committee. The Director of Open Spaces confirmed that the City of London Corporation was in contact with the relevant local authorities regarding methods to improve travel facilities for the Forest. It was added that the Car Park Strategy will engage with these issues.

RESOLVED- That the report be noted.

8. EPPING FOREST RESPONSE TO COVID PANDEMIC (SEF 17/20)

The Committee received a report of the Director of Open Spaces on the Epping Forest Management Team's response to the COVID Pandemic. The Chairman thanked Officers and volunteers for their work in the Forrester during COVID. The Director of Open Spaces provided further information on the temporary mortuary facility which had been established at a site in Wanstead Flats noting national emergency powers and the role of the Gold Group in the approval of the site. It was commented by a member of the Committee that effective communication was important in scenarios where urgent decision making was required. In addition it was clarified by the Director of Open Spaces that the site had been chosen for the temporary mortuary facility, in part, because it was of relatively low ecological value, but confirmed that a commitment to improving ecology of the site was included in the agreement with the Government. The Chairman agreed with a comment made by a member of the Committee noting that the communication of the urgent decision on this subject could have been

better and stated that that a return to more conventional governance structures was expected.

The Director of Open Spaces provided an update on the effect that the COVID restrictions had on air pollution within Epping Forest.

RESOLVED- That the report be noted.

9. LOCAL PLANS UPDATE: GREEN INFRASTRUCTURE STRATEGY CONSULTATION (SEF 18/20)

The Committee received a report of the Director of Open Spaces on the City of London Corporation's response to the Epping Forest District Council's Green & Blue Infrastructure Strategy. The Director of Open Spaces introduced the report and highlighted the requirement for a Green Infrastructure plan to properly mitigate the effect of local development on the Forest. In addition, it was noted that a letter response from the Epping Forest and Commons Committee Chairman had been drafted and was close to being completed.

A member of the Committee emphasised the role that organisations represented on the Committee could play in highlighting the importance of mitigating the effect of increased housing to the Epping Forest Special Area of Conservation and requested that Officers work to facilitate this at an early stage. The Director of Open Spaces replied by explaining that the project was now in a stage where the Suitable Alternative Natural Greenspaces (SANGs) Strategy proposals would be key to the successful mitigation of increased development. In addition, it was noted that the funding provision, transparency and consultation mechanisms would be crucial to the successful mitigation.

A member of the Committee commented that the Loughton Residents Association were disappointed that the Epping Forest District Council's Green & Blue Infrastructure Strategy included some building on existing green space. The Director of Open Spaces agreed observing that the COVID-19 pandemic had highlighted the public need for large high-quality open spaces. Replying to a query from a Committee member the Director of Open Spaces explained that the SAC Mitigation Strategy would include an agreed framework for local authorities.

A Committee member commented that consideration needed to be given to farming needs within the Forest and noted that a balance between park and open land was important to maintain. In response the Director of Open Spaces clarified the City's position on the use of Buffer lands and agreed that a sustainable balance between park and open land needed to be considered appropriately.

Replying to a query from a Committee member it was confirmed that a strategy for managing cycling within the Forest was being developed and would be considered by Members once finalised.

RESOLVED- That the report be noted.

10. QUESTIONS

Replying to a query from a Committee member Director of Open Spaces explained that COVID-19 had heavily impacted the Epping Forest management finances which would require an increased emphasis on income generation noting that this was a required consideration across all of the City of London Corporation managed open spaces.

A member of the Committee expressed frustration that he had not received notice of the Epping Forest Consultative Committee meeting and stated that it was vital that an adequate period of notice be provided to allow consultation with organisation the member represented.

11. ANY OTHER BUSINESS

There was no further business considered.

The meeting closed at 9.00 pm

Chairman

Contact Officer: Richard Holt
Richard.Holt@cityoflondon.gov.uk

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