



Epping Forest Consultative Committee

- Date:** WEDNESDAY, 21 OCTOBER 2020
- Time:** 7.00 pm
- Venue:** VIRTUAL PUBLIC MEETING (ACCESSIBLE REMOTELY)
- Members:** Graeme Doshi-Smith (Chairman)
Benjamin Murphy (Deputy Chairman)
Sylvia Moys
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
Matthew Frith, London Wildlife Trust
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
- 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/OE3kEPLaDVE>

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

1. **APOLOGIES**

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

3. **MINUTES**

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

For Decision
(Pages 1 - 6)

4. **EPHING FOREST AND COMMONS COMMITTEE DRAFT MINUTES**

To receive the draft minutes of the Epping Forest and Commons Committee meeting held on the 7th of September 2020.

For Information
(Pages 7 - 14)

5. **REVIEW OF CONSULTATIVE COMMITTEE MEMBERSHIP**

The Director of Open Spaces to be heard.

For Information

6. **EPHING FOREST - SUPERINTENDENT'S UPDATE FOR JULY 2020 (SEF 20/20)**

Report of the Director of Open Spaces.

For Information
(Pages 15 - 46)

7. **VISITOR SURVEY**

The Director of Open Spaces to be heard.

For Information

8. **EPHING FOREST CONSULTATION POLICY SEF 24/20**

Report of the Director of Open Spaces.

For Information
(Pages 47 - 58)

9. **EPHING FOREST CYCLING STRATEGY SEF 25/20**

Report of the Director of Open Spaces.

For Information
(Pages 59 - 74)

10. **WANSTEAD PARK PONDS PROJECT - INITIAL ENGINEERING ASSESSMENT**

Report of the Director of Open Spaces.

For Information
(Pages 75 - 94)

11. **THE GROTTTO, WANSTEAD PARK: CONSERVATION MANAGEMENT PLAN SEF 22/20**

Report of the Director of Open Spaces.

Appendix to follow.

For Information
(Pages 95 - 104)

12. **PATH MANAGEMENT: POLICY DEVELOPMENT NOTE SEF 23/20**

Report of the Director of Open Spaces.

For Information
(Pages 105 - 142)

13. **NIGHT-TIME GATING PROPOSALS FOR MANOR ROAD, HIGH BEACH FOR AMENITY PURPOSES SEF 26/20**

Report of the Director of Open Spaces.

For Information
(Pages 143 - 152)

14. **EPPING FOREST CAR PARKING - POLICY AND STRATEGY, INTRODUCTION OF PARKING CHARGES AND ENFORCEMENT**

Report of the Director of Open Spaces.

To follow.

For Information

15. **LOCAL PLANS: ON-SITE SAMM PROPOSALS**

Report of the Director of Open Spaces.

To follow.

For Information

16. **QUESTIONS**

17. **ANY OTHER BUSINESS**

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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
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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 Forest 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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EPPING FOREST & COMMONS COMMITTEE **Monday, 7 September 2020**

Minutes of the meeting of the Epping Forest & Commons Committee held at Virtual Meeting Accessible Remotely on Monday, 7 September 2020 at 11.30 am

Present

Members:

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

Officers:

Richard Holt	- Town Clerk's Department
Polly Dunn	- Town Clerk's Department
Kristina Drake	- Media Officer, Town Clerk's Department
Colin Buttery	- Director of Open Spaces
Paul Thomson	- Superintendent of Epping Forest
Andy Barnard	- Superintendent of The Commons
Jacqueline Eggleston	- Head of Visitor Services (Epping Forest)
Jeremy Dagley	- Head of Conservation, Epping Forest
Martin Newnham	- Open Spaces Department
Helen Read	- Conservation Officer, Open Spaces
Jo Hurst	- Business Manager, Epping Forest

1. APOLOGIES

Apologies were received from Gregory Lawrence and Sylvia Moys.

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

No declarations were received.

3. **ORDER OF THE COURT OF COMMON COUNCIL**

The Committee received the Order of the Court of Common Council dated 16 July 2020 appointing the Committee and setting its Terms of Reference. The Town Clerk noted the change to include the newly elected Verderers.

A member of the Committee commented that the Committee's Terms of Reference was not constitutional. The Town Clerk replied that the Comptroller would be informed of this concern.

RESOLVED- That the Epping Forest and Commons Committee Order of the Court of Common Council be noted.

4. **ELECTION OF CHAIRMAN**

The Committee proceeded to elect a Chairman in accordance with Standing Order No. 29. The Town Clerk informed that Graeme Doshi-Smith, being the only Member expressing their willingness to serve, was duly elected Chairman of the Epping Forest and Commons Committee for the ensuing year and took the Chair for the remainder of the meeting.

RESOLVED- That Graeme Doshi-Smith be elected Chairman of the Epping Forest and Commons Committee for the ensuing year.

5. **ELECTION OF DEPUTY CHAIRMAN**

The Committee proceeded to elect a Deputy Chairman in accordance with Standing Order No. 30. The Town Clerk informed that Benjamin Murphy, being the only Member expressing their willingness to serve, was duly elected Deputy Chairman of the Epping Forest and Commons Committee for the ensuing year and took the Chair for the remainder of the meeting.

RESOLVED- That Benjamin Murphy be elected Deputy Chairman of the Epping Forest and Commons Committee for the ensuing year.

6. **MINUTES**

The Committee considered the draft public minutes and non-public summary of the last meeting of the Epping Forest and Commons Committee held on the 6th of July 2020.

RESOLVED- That the public minutes and non-public summary of the Epping Forest and Commons Committee held on the 6th of July 2020 be approved as an accurate record.

7. **2019/20 COMMITTEE APPOINTMENTS**

The Committee considered a report of the Town Clerk, inviting Members to make their appointments to various Consultative Committees and Groups for 2020/21.

The Committee agreed that the Consultative Committees and Groups would continue with their membership for the previous year with Verderers elected in January appointed in the place of previously elected Verderers. The Director of Open Spaces explained that that Epping Forest Joint Consultative Committee

was oversubscribed with relation to the agreement with the Forest Skills Centre and that only three Members should be appointed to the Committee.

The Town Clerk informed the Committee that two Members had stated their interest to be appointed as the local observer on the Open Spaces & City Gardens Committee and therefore the Committee would move to vote on this appointment. A vote on this appointment was conducted with nine votes in favour of Deputy Phillip Woodhouse and three in favour of Jeremy Simons. Deputy Phillip Woodhouse was therefore approved as the Epping Forest and Commons Committee appointed local observer on the Open Spaces & City Gardens Committee.

RESOLVED – That the following appointments be agreed:

Ashtead Commons Consultation Group

Graeme Doshi-Smith (Chairman)
Benjamin Murphy (Deputy Chairman)
Sylvia Moys
Jeremy Simons

Burnham Beeches and Stoke Common Consultation Group

Graeme Doshi-Smith (Chairman)
Benjamin Murphy (Deputy Chairman)
Sylvia Moys
Alderman Robert Hughes-Penney

Couldson Commons, West Wickham & Spring Park Consultation Group

Graeme Doshi-Smith (Chairman)
Benjamin Murphy (Deputy Chairman)
Sylvia Moys
Jeremy Simons

Epping Forest Joint Consultative Committee

Graeme Doshi-Smith (Chairman)
Benjamin Murphy (Deputy Chairman)
Sylvia Moys

Epping Forest Consultative Committee

Graeme Doshi-Smith (Chairman)
Benjamin Murphy (Deputy Chairman)
Sylvia Moys
Caroline Haines
Verderer Michael Chapman DL
Verderer Paul Morris
H.H. Verderer William Kennedy
Verderer Nicholas Munday

Epping Forest Management Plan Steering Group

Graeme Doshi-Smith (Chairman)
Benjamin Murphy (Deputy Chairman)

Sylvia Moys
Benjamin Murphy
Verderer Michael Chapman DL
Verderer Paul Morris
H.H. Verderer William Kennedy
Verderer Nicholas Munday

Open Spaces and City Gardens Committee Representative
Deputy Phillip Woodhouse

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

The Committee received a report of the Town Clerk on the dates for 2020 relating to the Epping Forest and Commons Committee. The Town Clerk clarified that the next meeting of the Committee would be held on the 16th of November and not the 17th as had previously been listed.

RESOLVED- That the report be noted.

9. **SUPERINTENDENT'S UPDATE**

The Committee received a report of the Director of Open Spaces which provided a general update on issues across the nine sites within 'The Commons' division.

The Committee's Deputy Chairman and the Chairman of the Open Spaces & City Gardens Committee highlighted the contribution of car parking charges to funding the management of the open spaces noting the importance of this in the period of increased pressures on the management budgets. The Chairman commented that there would be a further discussion of ideas for increasing revenue later in the meeting. The Director of Open Spaces explained that proposals for car parking charges in Epping Forest would be considered at the November meeting of the Epping Forest and Commons Committee.

RESOLVED- That the report be noted.

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

The Committee received the draft minutes of the Burnham Beeches and Stoke Common Consultation Group meeting held on the 18th of August 2020. The Director of Open Spaces noted that it was a productive and well supported meeting which was particularly positive when considering the difficulties associated with remote committee meetings.

RESOLVED- That the draft minutes of the Burnham Beeches and Stoke Common Consultation Group meeting held on the 18th of August 2020 be noted.

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

The Committee considered a report of the Director of the Open Spaces on the Timetable Update regarding the production of New Management Plans and Associated Public Consultation for Kenley Common, Coulsdon Common, Riddlesdown and Farthing Downs/New Hill. The Director of Open Spaces introduced the report and highlighted the key elements to Members.

RESOLVED- That the amended timetable for the production of the 10-year management plans for Kenley Common, Coulsdon Common, Riddlesdown and Farthing Downs/New Hill be approved.

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

The Committee considered a report of the Director of Open Spaces concerning the continued use of the five existing PSPOs (Public Safety Protection Orders) at Burnham Beeches and the outcome of the public consultation process. The report provided a summary of the key elements of the proposal and the previous actions taken on this project.

RESOLVED- That: -

- I. Option 1, as explained in the report, to extend the effect of the existing PSPOs at Burnham Beeches for a further three years from 1st December 2020 be approved; and
- II. That the Comptroller and City Solicitor be authorised to make the replacement/extended Orders; and
- III. That authority be delegated to the Director of Open Spaces to authorise officers at Burnham Beeches to issue Fixed Penalty Notices in relation to Public Spaces Protection Orders; and
- IV. That the set the fixed penalty for breach of a Public Spaces Protection Orders at Burnham Beeches be approved at £80 with a reduction to £50 if paid within 10 days.

13. SUPERINTENDENT'S UPDATE

The Committee received a report of the Director of Open Spaces which provided a report summary of the Epping Forest Division's activities across July 2020. The Chairman commented on the work of Officers across an extremely busy summer period.

Replying to a query from a member of the Committee the Director of Open Spaces confirmed that the engineer's report on the Wanstead Park reservoirs had been completed and would be incorporated into a report Committee for consideration at the November meeting. Responding to a further comment, the Director of Open Spaces confirmed that the Dams in question were regularly inspected by Officers including the water levels.

Responding to a query from the Deputy Chairman the Director of Open Spaces explained the City of London Corporation's policy with regard to rough sleepers in Epping Forest noting the Corporation's adherence to the 'No Second Night Policy' and the cooperation with relevant local authorities to assist rough sleepers.

The Chairman of Open Spaces and City Gardens Committee referenced a recent publication on the voltage shocks to cattle in invisible fencing and requested further information on the use of electric collars in the management of the cattle in Epping Forest. The Director of Open Spaces explained that the shocks to cattle in the invisible fencing system were less than the equivalent from physical fences and observed that, as an audio warning precedes the shock administered, cattle quickly learn to avoid these prohibited areas and therefore rarely experienced any shock. In addition, the Director of Open Spaces explained that the invisible fence system could not be extended to deer in the Forest and these were wild animals.

The Director of Open Spaces explained that the Deer Strategy was due to be completed and ready for the Committee's consideration at the meeting in November. In addition, it was confirmed that the Cooped Hall management plan, which was also due to Committee consideration, would look at the management of the reservoir present at the site.

RESOLVED- That the report be noted.

14. DRAFT MINUTES OF THE EPPING FOREST CONSULTATIVE COMMITTEE

The Committee received the draft minutes of the Epping Forest Consultative Committee held on the 24th of June 2020.

RESOLVED- That the draft minutes of the Epping Forest Consultative Committee held on the 24th of June 2020 be noted.

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

A member of the Committee commented on the issue of maintaining swan nesting sites within Epping Forest and expressed that something needed to be done to resolve these issues. The Director of Open Spaces explained that combating these issues would likely be an expensive undertaking. The Committee discussed the possibility of involving volunteers and the Vintners Livery Company in this process.

It was noted by a member of a Committee that the increased visitor numbers had demonstrated that the communication, including signage and the City of London Corporation open spaces website, were not working in an optimal manner. The Chairman noted that there was a balance to be reached between maintaining aesthetic quality of the Forest and providing appropriate signage. In addition, the Chairman commented that the City of Corporation's open spaces website was not of the quality required and suggested that this matter be escalated by Officers.

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

There was no urgent business considered in the public session.

17. **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.

18. **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 6th of July 2020.

RESOLVED- That the non-public minutes of the Epping Forest and Commons Committee held on the 6th of July 2020 be approved as an accurate record.

19. **LOCAL PLANS UPDATE - BURNHAM BEECHES SAC**

The Committee received a report of the Director of Open Spaces which provided a summary of the work undertaken regarding Local Plans and the Burnham Beeches SAC.

RESOLVED- That the report be noted

20. **FARM BUSINESS TENANCY UPDATE**

The Committee considered a report of the Director of Open Spaces on the Farm Business Tenancy Update.

RESOLVED- That the report be agreed.

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

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

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

The Committee considered one item of urgent business in the non-public session.

The meeting ended at 1.45 pm

Chairman

Contact Officer: Richard Holt

richard.holt@cityoflondon.gov.uk

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.

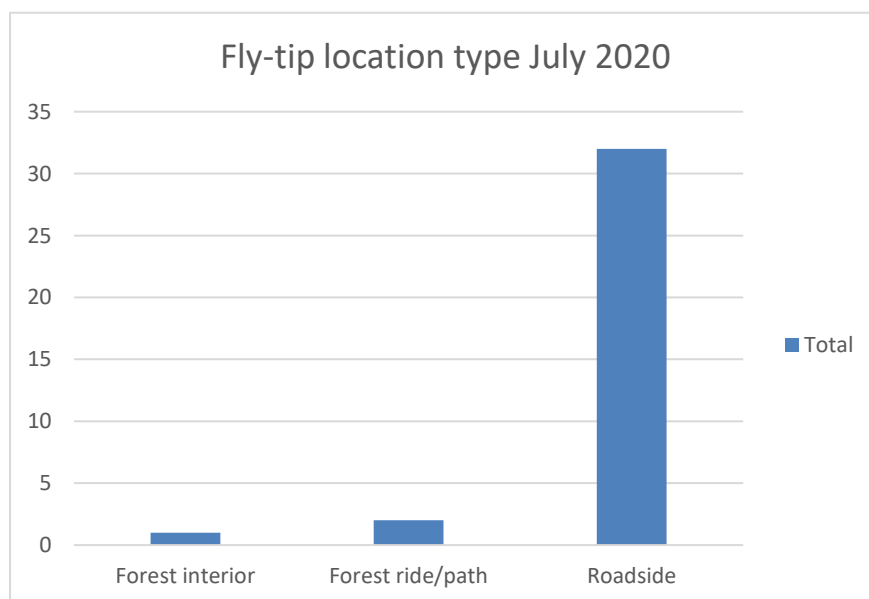
Weather

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

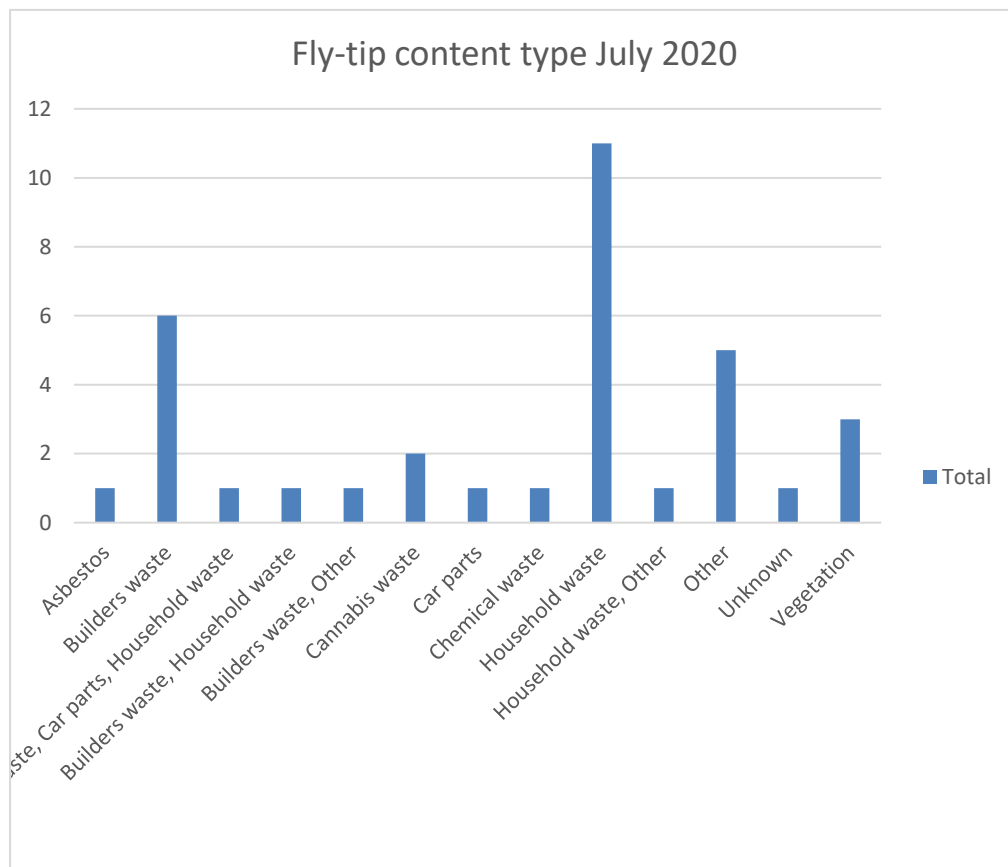
Forest Services

Fly Tipping

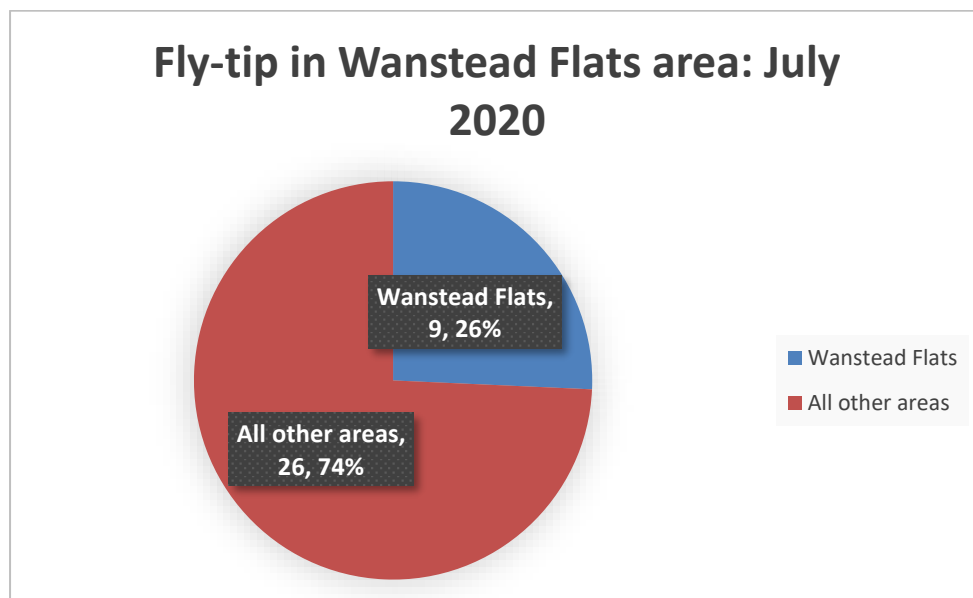
5. There were a total of 35 fly-tips recorded over the period of July 2020, this represents a 27% decrease over the same period in 2019.



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.

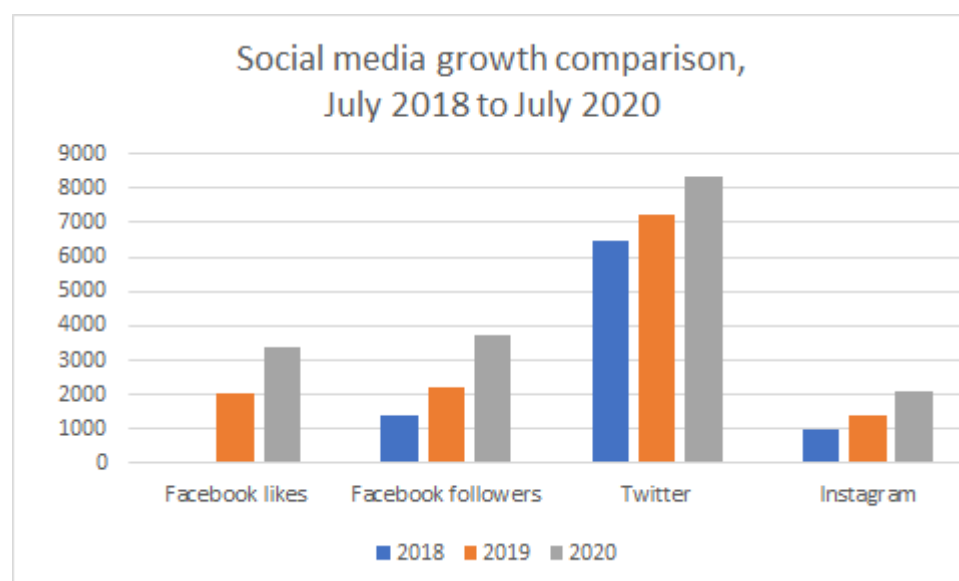
59. Parkrun is still not in operation due to COVID-19.

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

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Chairman, Epping Forest and Commons Committee

Graeme Smith



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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.

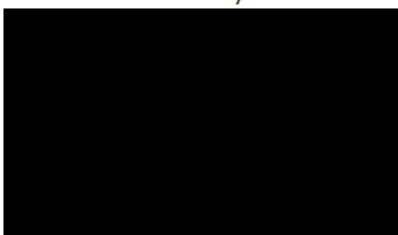
52. We note that tourism is not considered within the G&BIS. Given the commitments made within the submission version of the Local Plan for the tourist economy it would seem important to have more within the G&BIS on tourism. For example, the Local Plan highlights the links between tourism and the environment.
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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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 one 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.

Committee(s): Epping Forest Consultative – for decision Epping Forest and Commons – for decision	Date(s): 21 10 2020 16 11 2020
Subject: Epping Forest Consultation Policy SEF 24/20	Public
Report of: Director of Open Spaces	For Decision
Report author: Jo Hurst – Business Manager Epping Forest	

Summary

Epping Forest has a large and active group of beneficiaries, consisting of residents, Forest users, clubs, groups et al who may need to be consulted on matters of Forest management policy where issues affect them.

The Epping Forest Consultation Policy explains the routes for such consultation and how beneficiaries may involve themselves.

This policy recognises and embraces the increasing power of electronic communication and social media as well as the need to comply with the General Data Protection Regulation (GDPR). It includes the Epping Forest Consultative Committee as a principle route of consultation, set up since the Statement of Community Involvement, which this policy replaces.

Recommendation

Consultative Committee Members are asked to:

- Consider the adoption of the Epping Forest Consultation Policy as a replacement to the Epping Forest Statement of Community Involvement 2011

Main Report

Background

1. English law has in recent decades recognized a common law duty to consult as an aspect of the duty of fairness. It was the subject of a comprehensive treatment by the Supreme Court in *R. Moseley v. London Borough of Haringey*, [2014]
2. The Epping Forest Statement of Community Involvement (SCI) was adopted in 2011 and outlined in detail when and how Epping Forest would consult with individuals and groups.

3. The SCI has been a crucial and important document over the last ten years but with recent changes to consultative processes and data management legislation this is an ideal time for it to be revised.

Current Position

4. In the almost ten years since the SCI was drawn up there have been significant changes to both our consultation community, and our methods of communicating with them. The introduction of the General Data Protection Regulation (GDPR) has also required change in the way we store, maintain and use information.
5. Social Media, particularly Twitter and Facebook has increased in power and popularity and has become the primary route for informing our community of changes, issues or events that may impact them.
6. The Epping Forest Consultative Committee met for the first time in 2018, with sixteen groups (with a further member later co-opted) representing a wide range of Forest users meeting three times a year with Members, Verderers and Officers.
7. Inovem, a state-of-the-art consultation and reporting platform, which is particularly effective for long and complex consultations has been adopted. For smaller, simpler consultations the use of Survey Monkey or similar has also proved to be popular and effective.
8. The Epping Forest Management Strategy and Business Plan includes targets and outputs for communications and Governance which, in order to be effective, require an update to the SCI to a more simple and flexible Consultation Policy.
9. A key change in the Consultation Policy to the SCI is to allow consultees to be responsible for their own data, and the information being shown or sent to them. This not only allows improved compliance with GDPR and greater control and transparency for consultees, but also simplifies and reduces the administrative burden at Epping Forest.
10. The Epping Forest Consultation Policy reflects the above changes and allows for much greater flexibility in method, scope and timing of consultations, whilst not excluding the ability and requirement for large-scale wide-ranging consultation as established in the SCI.

Options

11. Continue with the SCI unchanged. This fails to recognise the changing environment of consultation, both internally and externally and it's requirement to maintain contact data for a large number of individuals and groups can be administratively burdensome as well as contrary to the opt-in principles of GDPR
This option is not recommended.

12. Adopt the new Epping Forest Consultation Policy which reflects changes experienced since the establishment of the SCI and brings greater flexibility to Consultation at Epping Forest. **This option is recommended.**

Proposals

13. The Epping Forest Consultation Policy is at Appendix 1
14. The Policy outlines the three main routes for Consultation, being the Epping Forest Consultative Committee, use of digital consultation platforms or correspondence with Verderers.
15. The overarching principles of GDPR are for 'data subjects' (any individual who can be identified through that data) to have opt-in control over how their data is managed and used.
16. The Policy replaces the requirement for Epping Forest to maintain a large, fixed list of Consultees, instead stressing the importance of individuals and groups to utilise the routes outlined as fits them best, with those individuals and groups able to maintain and manage their own contact data and preferences.
17. The Policy acknowledges and adopts the use of social media platforms, such as Twitter and Facebook as the chief 'noticeboard' for alerts and news relating to Epping Forest – including invitations to engage in consultation processes.

Corporate & Strategic Implications

18. The Consultation Policy supports the City of London Corporate Plan 2018-23, particularly outcomes within "Contribute to a flourishing society" and "Shape outstanding environments".
19. Update to Epping Forest Consultation policy is necessary to support a number of threads of the Epping Forest Management Strategy and Business Plan 2020-2030 from site based specific changes, to broader aspects of policy and management.

Implications

20. Adoption of the Epping Forest Consultation Policy allows easier compliance with GDPR as individuals and groups are responsible for their own data and contact preferences.
21. No HR, property or other implications are foreseen.

22. **Charity** - Epping Forest is a registered charity (number 232990). Charity Law obliges Members to ensure that the decisions they take in relation to the Charity must be taken in the best interests of the Charity.

Conclusion

23. The Epping Forest Consultation Policy has been formulated to represent a simpler more flexible replacement to the previous SCI, now almost ten years old.
24. The Policy reflects many changes, including the establishment of the Epping Forest Consultative Committee, current expectations of data management and control as well as the rise in the use of social media for messaging.

Appendices

- Appendix 1 – Epping Forest Consultation Policy

Jo Hurst

Business Manager Epping Forest

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Epping
Forest

Registered Charity

Epping Forest Consultation Policy

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Introduction

1. The Epping Forest Act (1878) entrusted the ownership and care of Epping Forest to the City of London Corporation as the Conservators of Epping Forest and its obligations still govern how the Forest is managed today.
2. As Trustees representatives of Epping Forest (Charity number 232990) the Conservators, staff and volunteers all work to safeguard the Forest from external pressures in an ever-evolving environment, and to enhance visitor access and experience.
3. We want to empower the beneficiaries of the charity, consisting of residents, Forest users, clubs, groups et al to have the opportunity to participate in decisions which affect the future of the Forest.
4. This document sets out the ways in which Epping Forest engages with the local community and other key stakeholders when preparing plans or projects which will affect the future of the Forest.
5. This document replaces the previous Epping Forest Statement of Community Involvement 2011.

Planning and management at Epping Forest

6. London's Great Forest – A strategy and management plan for Epping Forest 2020 – 2030 sets out plans and strategies for Epping Forest in the ten years from 2020 to 2030.
7. The plan lists a number of documents, strategies, policies and objectives, ranging from site specifically detailed Integrated Site Plans (ISP), Local Area Plans (LAP) Policy Development Notes (PDN) and Conservation Management Plans (CMP) through to more subject-specific policies and wide ranging Visitor strategies, financial and income generation plans, governance and charity reviews etc.
8. Documents at a higher level include the Open Spaces Business Plan and the City of London Corporate Plan. Together, all these documents, plans and policies are sometimes referred to as "the golden thread" to be considered in the context of organisational alignment.
9. By following the procedures contained within these documents, we ensure that our actions are fair, efficient and transparent for all, including members of staff, Forest visitors and local people.

Decision Making and Governance

10. Epping Forest is managed by the Epping Forest and Commons Committee (EF&CC), made up of twelve appointed Members of the City of London Court of Common Council, plus four Verderers, locally elected under the terms of the Epping Forest Act 1878 (Schedule 4). The Committee are also the Trustees representatives for the Epping Forest Charity. The Committee sits formally six times per year and also has many other local and project specific meetings.
11. Chairman, Deputy Chairman, Verderers and other members of the Epping Forest and Commons Committee attend local liaison meetings with Boroughs overlapping the to discuss shared issues and matters raised to Ward Councillors.
12. The Epping Forest and Commons Committee papers, minutes and agendas can be found here
<http://democracy.cityoflondon.gov.uk/mgCommitteeDetails.aspx?ID=122>
13. A range of broader and strategic policy matters are considered by the Open Spaces Committee when necessary. A number of other Committees within the City of London have ultimate decision-making powers over financial management and budget setting, project management and other critical strategic factors. These are all overseen by the City of London Court of Common Council.
14. Further information on City of London Governance is here
<http://democracy.cityoflondon.gov.uk/>

Who we consult and when

15. It is vital that the needs of our charity beneficiaries (visitors, Forest users, residents et al) are fully recognised and integrated with the ecological, and financial health of the Forest and its long-term management and conservation. We understand that the ability to influence decisions on these specific, special areas is important to those who use or enjoy them.
16. As demonstrated above, matters of policy or otherwise vary widely, in subject matter, geographical area and scope for change. When a project or plan is outside of, or a change to established policy or management protocols, and there is the scope for the views of charity beneficiaries to influence or change that project or plan, then we would seek to consult using processes explained herein.
17. Charity beneficiaries may be consulted on specific local policies. However, the majority of policies are implemented at a corporate or departmental level, based on best practice, legislative changes or

efficiency purposes. These policies would not usually be subject to consultation by Epping Forest

18. We are also very aware that our consultees, be they statutory bodies, stakeholder groups or individuals are likely to be different in each case. Individuals and groups are constantly changing and those involved in one project may not be interested, present or able to be involved in the next.
19. We will abide by the UK Government Consultation Principles 2018 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/691383/Consultation_Principles_1_.pdf
20. Whenever we consult, we will as far as is possible ensure that:
 - a. Consultations are accessible and written or explained in plain English.
 - b. The timing of consultation is appropriate to as many potential consultees as possible.
 - c. Deadlines for responses from consultees are realistic and achievable
 - d. Project timescales are adequate to allow full consideration of consultation responses in the next stages of that project
 - e. The results of consultations, and reasoning for subsequent decisions are communicated in a timely manner (no more than 12 weeks from completion of consultation) and in an appropriate format (e.g. a similar route to the original consultation).
21. When we work in partnership other organisations, funders or statutory bodies, they may have their own consultation pathways which make take precedence or run in tandem.
22. The Forest itself crosses boundaries of multiple local authorities. We must ensure that our processes are complementary across the whole of the Epping Forest Estate.
23. Other than statutory consultation (where organisations and timescales are clearly defined) when it is important for us to provide advice and information about a plan or policy and to seek and hear the views of all of those interested in any individual area we will use the routes outlined below.

Routes for Consultation

24. There are four main routes for individuals and groups to engage with consultation processes at Epping Forest as outlined below

25. The use of these channels allows individuals and groups to choose when they wish to engage with us and on which issues.
26. Epping Forest may collate equalities data alongside some of our surveys or consultations in order to monitor the effectiveness of communication and to help us improve. Provision of this information is optional.
27. All data stored by us is kept, maintained and used in compliance with the City of London Data Protect Policy, the General Data Protection Regulation (GDPR) and all other relevant legislation.

Epping Forest Consultative Committee

28. The Epping Forest Consultative Committee (EFCC) was formed in late 2017 with its first meeting in January 2018. The full Terms of Reference of the Committee are available on the City of London Committee web pages.
29. 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.
30. 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 reviewed by the Consultative Committee.
31. The EFCC is not a formal decision-making body, but views will be noted in formal reports to the Epping Forest and Commons Committee.
32. Consultative Committee meetings are scheduled several weeks prior to each 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 if necessary, or feedback to be noted.
33. The Consultative Committee is made up of approximately sixteen groups with local or national subject matter interest. They broadly represent the following themes of interest:

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	3

Recreational user groups – e.g. walkers, riders, cyclists	
Sports	3
Formal organised sports on Forest e.g. Golf, Football, cricket running etc.	16

34. Membership is reviewed and renewed three-yearly and administered by City of London Town Clerks Department. Agendas, minutes and other details are here
<http://democracy.cityoflondon.gov.uk/mgCommitteeDetails.aspx?ID=1253>
35. Individuals or groups who are not Consultative Committee Members may attend the meetings (although may not always be permitted to speak) or may approach members who represent their area of interest to express and share their views.

The Forest Verderers

36. Verderers are locally elected every seven years under the terms of Schedule 4 of the Epping Forest Act 1878. Although historically they represent the Commoners of the Ancient Forest Parishes, they now fill a much broader local representation role, sitting on the Epping Forest and Commons Committee.
37. Two Verderers are elected in the southern parishes of the Forest, and two in the North, although the geographical split for elections is not necessarily carried through to their roles, and any or all may be involved in any matter across the length or breadth of the Forest.
38. All Verderers live locally and attend the Epping Forest and Commons Committee as full Members regarding Epping Forest business.
39. Contact details for the Verderers are on the City of London webpage <https://www.cityoflondon.gov.uk/things-to-do/green-spaces/epping-forest/how-we-manage-epping-forest> and they may be contacted for discussion on any matter concerning the management of Epping Forest. They may also proactively seek views of local organisations or individuals pertinent to projects or management themes.

Digital Consultation Platforms

40. Epping Forest uses various digital platforms to carry out consultation, from short polls and surveys through to full complex consultation on wide ranging policies.
41. Epping Forest subscribes to an online consultation portal and database provided by Inovem, accessible via the City of London website when consultations are active.

42. This database is designed specifically for consultation and subsequent reporting on large and complex matters, for example the earlier stages of the Epping Forest Strategy and Management Plan.
43. Individuals and organisations are encouraged to register their contact details, and interests should they wish, to receive notification of relevant consultation processes they may want to contribute to.
44. Individuals or groups who 'sign up' to such platforms are responsible for updating and maintaining their own contact details and preferences through that account.
45. Brief snapshot surveys may also be carried out electronically through platforms such as Survey Monkey and publicised through our literature, signage or social media feeds as below.

Face-to-face

46. In some circumstances it may be appropriate or necessary for Epping Forest representatives to consult face-to-face with individuals or groups regarding certain projects.
47. Such circumstances include new or unusual site-specific works or changes, where views of user groups and residents are critical to the planning and success of that project.
48. Face-to-face consultation events organised by us will be advertised in advance, particularly via social media or by local posters or leaflets where possible.

General Information and Notifications

49. Epping Forest share information about services, projects and important changes and events through a number of means. This may include notice of consultation surveys or meetings, Verderer elections and calls for expressions of interest for the Consultative Committee for example. These include but are not limited to:
 - a. Epping Forest pages on the City of London website.
<https://www.cityoflondon.gov.uk/things-to-do/green-spaces/epping-forest>
 - b. The City of London Consultation web pages
<https://www.cityoflondon.gov.uk/footer/consultations>
 - c. Epping Forest publications and literature, particularly Forest Focus.
 - d. Epping Forest news feed on Twitter @CoLEppingForest. This is staffed periodically through normal office hours.
 - e. Epping Forest on Facebook @EppingForest.

- f. Epping Forest on Instagram
- g. Site specific signage or leaflets.
- h. Local Press (especially if a legal requirement)

Contacting us

50. The postal address for Epping Forest office is:
City of London Epping Forest
The Warren
Nursery Road
Loughton, Essex
IG10 4RW

51. Epping Forest central office 24hr telephone
020 8532 1010

52. Epping Forest email address
epping.forest@cityoflondon.gov.uk

Committee(s)		Dated:
Epping Forest Consultative Committee	For consultation	23 October 2020 16 November 2020
Epping Forest and Commons Committee	For decision	
Subject: Epping Forest Cycling Strategy SEF 25/20		Public
Report of: Director of Open Spaces		For Decision
Report author: Laura Lawson		

Summary

A new cycling strategy for Epping Forest outlines the challenges currently presented by cycling in Epping Forest and proposes a range of actions to address these.

Specifically, actions include increasing engagement with the different cycling communities, creating a circular route with targeted promotion at cyclists, allowing greater permissive cycling in Wanstead Park and identifying temporary exclusion zones for cycling in the Forest to allow for habitat recovery.

Recommendation

Consultative Committee Members are asked to:

- Consider the Epping Forest Cycling Strategy

Main Report

Background

- The Forest is a popular place to enjoy cycling in the natural environment and to explore further than visitors might be able to do on foot. In the Visitor Survey (2014) it was estimated that as many as 10% of visitors to Epping Forest do so to cycle. In context, that is over 400,000 visits per annum. The most recent 'snapshot' survey (2020) puts that figure at 18% of users.
- Existing byelaws cite bicycles and tricycles in section 3(10) of the Epping Forest Byelaws & Additional Byelaws (1980/1986); *Driving, moving, or using a bicycle, tricycle or vehicle upon the Forest to the danger, injury, annoyance or inconvenience of the public' is prohibited.* The byelaw does not represent an outright ban on bicycles but instead outlines boundaries regarding forms of exhibited behaviour.
- There are several areas of the Forest where cycling is not permitted, either by byelaw (Wanstead Park), to preserve designated sites or by previous decisions by your Committee, taken under a Various Powers Act restrict use up to 10% of the Forest.

4. Responsible cycling is welcomed in Epping Forest and a Code of Conduct (Appendix 1) outlines the behaviours expected and those which are not permitted, such as racing, of any form.
5. There have been numerous reports to your Committee, dating from the mid-1990s detailing specific cycling related issues. This is in part due to the ebb and flow of cycling popularity influenced by external drivers, such as the rise in popularity of both Multi-Terrain Bike (MTB) (1996) and BMX (2008), following their inclusion in the Olympic Games.

Current Position

6. Since the Coronavirus pandemic, the Forest has seen a large increase in visitors. Recent snapshot visitor surveys put the increase of visitors at 350%.
7. These visitors enjoy many different pastimes and cycling, in its various disciplines, is proving increasingly popular, growing by 8% in recent months.
8. This growth may account for an increase in the incidents of user conflict between cyclists and other Forest users, such as dog walkers and horse riders, and some negative impact on some sensitive areas of the Forest.
9. To address this initially, the Cycling Code of Conduct has recently been revised and re-circulated via signage, social media and the City of London website. The Code promotes shared use and courteous behaviour which most visitors abide by.
10. Forest Keepers have found evidence of physical alterations (construction of jumps and berms) installed to increase the riding challenge. These are constructed by individuals or small groups, belonging to a sub-set of cyclists, known as mountain bike (MTB) or Bicycle Motocross (BMX) riders.
11. These constructions are not permitted, and the Operations Team have been removing them when found. This has caused a small amount of negative publicity, particularly on interest groups on social media, which dissipated quickly.
12. Officers recognise that more work is needed to fully understand and engage with cyclists using the Forest and the Epping Forest Cycling Strategy (Appendix 2) outlines the opportunities Epping Forest presents for recreational cyclists whilst providing additional measures to manage the balance between visitors and protection of the Forest.

Proposals

13. The Epping Forest Cycling Strategy proposes additional measures be taken to help manage the impacts of cycling in Epping Forest; to better ensure the safety and enjoyment of all visitors and to mitigate damage, or potential damage, to the Forest environment which increased cycling may bring.
14. The strategy will be reviewed cyclically (initially 3 years) to ensure that the content is relevant and responsive to the demands of the current time.
15. Specifically, the strategy proposes several actions that will address the challenges presented by cycling in Epping Forest:

- a. Promoting responsible conduct and the 'shared use' nature of Forest paths and trails
- b. Creation of 'exclusion zones' where cycling will be prevented for a set period to allow for habitat restoration
- c. Additional clarity that there will be no allowance of man-made MTB or BMX structures
- d. Proactive engagement with cyclists capturing the various cycling variations, such as MTB, BMX or gravel riding
- e. Promotion of a circular cycling route
- f. Engagement with partners to enable where feasible, commuting within the Forest by bicycle
- g. A review of cycling in Wanstead Park with an aim to increase permissive use

Options

- 16. Option 1 – Adopt the Epping Forest Cycling Strategy. Adopting the Strategy will assist officers in their duty to protect the Forest and improve the visitor experience. **This option is recommended.**
- 17. Option 2 – Do not adopt the Epping Forest Cycling Strategy. Dismissing the Strategy will not address the continued growth in the number of visitors choosing to cycle in Epping Forest and the consequential impact on the Forest and its other visitors. **This option is not recommended.**

Corporate & Strategic Implications

Strategic implications

- 18. The strategy supports the Corporate Plan (2018-23) outcomes – Contributes to a flourishing society (1 & 2) and Shape outstanding environments (11 & 12)
- 19. The strategy supports the Open Spaces Department Business Plan 2020/21 – outcomes 1, 3, 5, 7, 8 & 11.
- 20. Recreational cycling meets with the Epping Forest Strategy, 'London's Great Forest' (2020 – 2030) strategic objectives 1 & 3 - 'A welcoming destination for all' & 'An inspiring space for peoples' health, recreation and enjoyment'

Financial implications

- 21. Initial actions proposed in the Strategy can be met within existing local risk budgets.

Equalities implications

- 22. An initial screening exercise of the equality impact of this decision has been undertaken by the City Corporation. At this stage, it is considered that there are no negative impacts on the protected equality groups.

Charity implications

23. Epping Forest is a registered charity (number 232990). Charity Law obliges Members to ensure that the decisions they take in relation to the Charity must be taken in the best interests of the Charity.

Conclusion

24. Epping Forest is an increasingly popular location for cycling. As the activity and nature of cycling grows, additional measures will be necessary to help to manage visitor enjoyment whilst protecting the Forest.

Appendices

- Appendix 1 – Epping Forest Cycling Code of Conduct
- Appendix 2 – Epping Forest Cycling Strategy

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Epping Forest

Registered Charity

Cycling Code of Conduct

- Use the shared use trails considerably to ensure the safety of others. Let people know you are there with a greeting or bell. Pedestrians and horse riders have priority.
- Approach corners and descents with caution; dogs, wildlife and cattle may cross your path unexpectedly.
- Racing bicycles (including digital KOM/QOM 'chasing') is prohibited in Epping Forest.
- Building or digging jumps or berms and tree cutting is prohibited.
- Leave no trace. Use the existing routes and avoid skidding to prevent erosion. Take your litter home.
- Leave gates as you find them, to prevent cattle straying.
- Respect 'No cycling' restrictions that exist to protect ancient monuments, easy access paths and delicate habitats.

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Epping
Forest

Registered Charity

Cycling Strategy

2020 - 2023

October 2020

City of London Corporation, Epping Forest

Issue Number: 001

Approval Date: 16 November 2020

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Author: Policy & Projects Officer, Visitor Services, Epping Forest

Approved by: Epping Forest and Commons Committee

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Introduction

1. Cycling is a growing, popular, recreational pastime, and it has previously been estimated that around 10% of people who visit the Forest, do so to cycle. In context, that is over 400,000 visits per annum.
2. Since the Covid-19 pandemic there has been up to 350% increase in visits to the Forest and cyclists now represents up to 18% of visitors.
3. Recreational cycling meets with the Epping Forest Strategy, 'London's Great Forest' (2020 – 2030)ⁱ strategic objective 3 '*An inspiring space for peoples' health, recreation and enjoyment*' and the City of London Corporate Plan 2018-23 aim: *Contribute to a flourishing society - People enjoy good health and wellbeing.*

What we have now

Paths and terrain

4. Paths in the Forest are mostly multi-user and none are designated or promoted specifically for cycling.
5. The terrain used for cycling varies in Epping Forest. There are 36kmⁱⁱ of surfaced shared-use paths which provide a firm 'gravel', surface that cyclists may use. These are not suitable for road bikes with tarmac specific tyres but suit most other bicycle types and all levels of cyclists, including young children, for enjoyable off-road leisure cycling.
6. There are also informal unsurfaced paths, totalling over 170kmⁱⁱⁱ, through rough woodland and grassland. These can become very muddy and difficult to cycle, particularly in the winter but are still popular with multi-terrain bike (MTB) riders year-round.

Signage and maps

7. Whilst there are many surfaced and unsurfaced paths in the Forest that cyclists use, they are not promoted for cyclists and there are no specific cycling routes. Signage aimed at cyclists is limited to areas where cycling is not permitted, such as at ecologically, historically and geologically sensitive sites.
8. There are nine waymarked routes which cover a combination of surfaced and unsurfaced paths. These are in the most part aimed at visitors on foot and routes may not be suitable for all types of bike/ability of rider. Similarly, the few other signposted routes are easy access trails where cycling is not permitted.

Cycling for access or travel

9. Cycling as a transport method for Londoners is supported by the City of London Corporation. This healthy, sustainable travel solution benefits the Forest by reducing the impact of air and noise pollution in and around the Forest. To encourage visitors to travel to/from the Forest by bicycle, cycle parking has been installed in the car parks upgraded as part of the Branching Out Project; Jubilee Pond, Chingford Hub, High Beach Hub, Connaught Water and at The View, Epping Forest Visitor Centre.
10. There are cycle parking facilities at Jubilee Pond, Chingford Hub, High Beach Hub and Connaught Water. These sites are highly popular with visitors and the cycle parking

facilities make them accessible by bicycle for those who choose sustainable transport methods.

11. Since 2010, the City of London Corporation has worked with local authority partners and Transport for London (TfL) to facilitate a number of cycle routes;

Date	Route name & connections	Distance (km)	Delivery Partner
2010	Quietway 6 (Barkingside to Wanstead Flats) &	6km	Redbridge & TfL
2011	Epping Forest Greenway (Snaresbrook to Stratford)	7km	Olympic Delivery Authority, TfL and LA's
2011	Centre Road Crossing Point (for the Redbridge Greenway)	N/A	Redbridge & TfL
2011	Wanstead Park Cycle Path	1.5km	Redbridge
2012	Roding Valley Way (Roding Valley Station to Beckton)	15km	Redbridge
2013	Wanstead Park Permissive Cycle Path	0.5km	Redbridge
2017	Quietway 6 (Aldersbrook Road to Aldgate)	5.5km	Newham & TfL

Cycle Hire

12. In 2017, the Conservators supported Go Further Cycling to provide cycle hire in the Forest just a short walk from Chingford train station. Chingford station is serviced by a direct, overland train from London Liverpool Street Station which takes around 25 minutes.
13. Go Further Cycling houses a small retail area for bicycle parts/spares and carry out servicing and repairs.

Other Facilities

14. Car Parks - There are numerous car parks, across the Forest, where adequate parking is provided for those wishing to travel to the Forest before starting their bicycle ride. This is often a choice for those engaging in more technical MTB due to the heavier bikes being unsuitable for road riding but also those with younger family members who are capable of cycling in a traffic free environment but cannot negotiate the busy access roads such as the A104, A121 or A1069.
15. Refreshments –Butler's Retreat and the Holly Tree Café provide indoor seated experiences for those seeking a social refreshment stop and the Forest Tea Huts, along with other local venues, give riders plenty of options to enjoy hot/cold drinks and snacks before, during or after their rides.

16. Toilets – Public toilets are available at the Visitor Centres at High Beach, Chingford and Wanstead Park and on Forest Land at Woodford Green (provided by London Borough of Redbridge).
17. Go Further Cycling and Epping Forest District Council both offer led cycle rides to encourage greater confidence cycling in the Forest for newer riders.

Cycling Restrictions

18. Cycling is currently **not permitted** in the following areas;

- i) Wanstead Park - It is contrary to Wanstead Park Byelaws and Regulations (1903) & additional byelaws 1950 to cycle in the park.

However, in line with the byelaws, there are two permissive access routes which have been set apart by the Conservators for the purpose of cycling, thus permitting access between the Aldersbrook Estate and Wanstead and vice versa, as indicated by signage to that effect exhibited in the Park.
- ii) The easy access paths found at High Beach, Connaught Water, Knighton Wood and Jubilee Pond – this is for the safety and comfort of visitors with access needs.
- iii) Loughton Camp and Amesbury Banks – cycling could cause damage to these two Iron Age earthworks, both Scheduled Ancient Monuments (SAM) which are of national importance.
- iv) Loughton Brook – listed as a Local Geological Site (LoGS) and the brook meanders have important geology that could be damaged by cycling.
- v) Buffer Lands – free range cycling is not permitted on this, **mainly farmed, land**. However, there are bridleways and byways which can be used in line with the Countryside Code.

19. Additional restrictions exist for certain types of bicycle

- i) De-restricted e-bikes or speed pedalecs are **not permitted**.^{iv}

20. Other activities which are **not permitted** are;

- i) Racing of any kind - including digital KOM/QOM 'chasing'
- ii) Building jumps, berms, trails or any other physical alteration of the Forest's fabric intended for cycling use.^v

21. The Conservators actively promote the **Epping Forest Cycling Code of Conduct** to ensure the safety, and comfort, of all our visitors and the protection of the Forest.^{vi}

Vision

22. Epping Forest is 'a **welcoming green space for recreational cyclists of all ages to explore and enjoy responsibly which aides connected local routes for active travel**'.

Objectives

23. To promote responsible cycling to ensure that those who choose to explore the Forest by bicycle can do so with ease and enjoyment without negatively impacting on the Forest or other visitors.
24. To enable provision for those in the local community choosing active travel to get to and from school, work or local facilities.
25. To improve engagement with the cycling community to educate and gain knowledge of the challenges and issues when cycling in Epping Forest.

Challenges

26. There are a number of significant challenges that are faced managing cycling in Epping Forest;
 - a) **User conflict** - Cyclists can be perceived as intimidating to other visitors using shared use paths, particularly if they pass without warning or at speed. However, complaints about cyclists are occasional so it appears that most cyclists ride considerately and yield to walkers and horse riders as required by the Epping Forest Cycling Code of Conduct and the Countryside Code. Complaints have increased during the Covid-19 pandemic which may indicate the number of riders new to cycling and/or to the Forest.
 - b) **Damage** – Some areas attractive to more adventurous cyclists have been damaged through repeated and intensive use. The more sensitive ground areas in the Forest are affected by compaction, erosion or plant destruction and some riders have also added man-made jump/ramp structures, damaging the ecology. At the time of publication, this is particularly apparent at the Claypit Hill area. The protection of the Forest takes priority over this type of activity which therefore cannot be permitted.^{vii}
 - c) **Carrying capacity** – During the Covid-19 pandemic, visitor numbers increased by around 350%, with survey data showing many more cyclists in certain areas. There is also an increased demand for housing in the area^{viii}. Local Plans for the London Boroughs neighbouring the Forest (Waltham Forest, Redbridge and Newham) project some 78,000 new homes and there are also proposals for over 11,400 homes in Epping Forest District Council by 2035. That is nearly 90,000 new neighbours for the Forest. It is certain that this will result in a lasting increase in the number of visitors, including those who cycle. This increase in visitor numbers will require management to ensure the Forest can cope with demand as highlighted during the pandemic.
 - d) **Engagement** - Other recreational activity groups, such as runners or horse riders are represented on the Epping Forest Consultative Committee (EFCC). Cyclists are not directly represented although there are currently several members of EFCC who are keen cyclists and do represent these visitors in a secondary capacity. The Conservators have not yet found an effective method to engage with the cycling community. We believe that this is in part due to the individual nature of the activity but also that those who cycle in Epping Forest tend to be content with the provision and therefore do not feel the need to engage currently.

- e) **Route Finding** - Cyclists tend to navigate the Forest through word of mouth and recommendation. The Epping Forest map in downloadable format is not sufficiently detailed for navigation around the Forest. A more detailed, Collins, map of Epping Forest is available to purchase but in the main cyclists are using electronically available apps such as Strava or GPS. This does mean that in some cases routes are being actively promoted which may or may not, be suitable for cycling
- f) **Commuting** - The Forest does not offer many routes suitable for commuting by road bicycle and cyclists in the main use their local tarmac roads in preference to off road in the Forest. The Forest suffers from the effects of pollution due to high traffic levels and has a role to play in enabling a modal shift away from car use. However, a significant increase in commuters travelling off-road by bike, through the Forest, could exacerbate current, or raise new, issues.
- g) **Wanstead Park** – The regulation of cycling in Wanstead Park is incongruous with the rest of Epping Forest as a large section of it is governed by a separate set of bylaws. There is a permitted cycle route through from Northumberland Avenue linking with Warren Road but cycling is otherwise not permitted within the Park. This is a confusing message with cyclists often cycling on routes other than the permitted route along with other members of the public under the impression that cycling is not permitted at all, creating conflict.

Actions

27. In order to address these challenges, the Conservators will aim to:

- a) **Reduce user conflict** – most visitors are respectful of each other and courteous of each other but there can be incidences where visitor behaviour is perceived as disrespectful, offensive or to cause a nuisance.
 - i) **Targeted pro-active management of visitors** – As part of our Communications Strategy, we will look at how we can better target messages to Forest visitors, promoting the 'shared-use' status of all paths.
 - ii) A **Code of Conduct for Cyclists** has been produced and posted throughout the Forest outlines the need for cyclists to give way to walkers, horses and their riders.
- b) **Reduce Damage** – Immediate remedial action is required to counteract the overuse and erosion caused to certain sensitive areas. We propose the creation of additional zones where cycling is excluded to allow recovery of the sensitive ground and tree root compaction. An initial exclusion period of 3 years is proposed for these zones while recovery is monitored. These will be reviewed and reopened at the end of the three years or the exclusion extended for a further period depending on recovery.
 - i) **Exclusion Zones** – Zones for a time limited exclusion of cycling will be identified from the following list of areas currently identified as suffering damage from cycling activity and will be prioritised in order of urgency. No more than 5 of these locations or a maximum of 100 acres will be excluded per three-year period.

Zones	Reason for exclusion
Claypit Hill, Pillow Mounds	Concentrated use causing severe erosion/damage
Long Running, Sunshine Plain, Furze Ground (heathland habitats)	detrimental to the ground flora structure and heathland flora, disturbance of reptiles
Court Hill (Compartment 11) & Deershelter Plain (Compartment 12)	Beech Special area of conservation (SAC) rare moss damage
Big View, Woodbury Hollow, Trueloves and Fernhills	Those with sensitive ground flora, ground nesting species and geologically important sites

- c) **MTB** - Forest protection, specifically the duty to 'preserve the natural aspect', is prioritised against installing man-made features for more challenging off-road riding. It is therefore not proposed to relax the restriction on building jumps and other features in the Forest or to set aside areas to allow this activity. There are two man-made cycle specific sites in the region which offer trails to satisfy those who require more specific, MTB, off-road riding. Redbridge Cycle Centre offers a 2.5km long blue trail and the Lee Valley Velopark offers 8km of trails with varying levels of difficulty, from blue to black. Both sites are less than 10 miles from Epping Forest.
- d) **Carrying capacity** – This will be addressed through a Sustainable Visitor Strategy which will target measures such as improved signage and facilities to encourage visitor use of more sustainable areas of the Forest. This, along with a reviewed programme of exclusion areas will centre cycling activity in areas and on paths that can sustain the activity but that remain equally attractive to users.
- e) **Engagement** – Proactive engagement with formal and informal cycling groups as well as individual cyclists will take place with a view to encouraging cycling representation on to the Epping Forest Consultative Committee at its next membership review.
- f) **Route Finding** – we will promote a dedicated circular cycle route within the Forest, connecting to cycle paths beyond the Forest. This will help to encourage cyclists away from informally promoted routes by third parties on to tracks that are properly managed for recreational cycling.
- g) **Commuting** - Whilst there is no intention of providing tarmac routes and lighting in the Forest which would be contrary to the protection of the natural aspect and designated conservation site, we will work positively with partners to enable where possible, better strategic links across Forest land to wider cycle networks to encourage greener transport options.
- h) **Wanstead Park** - We will undertake a review of the current restrictions in the Park with an aim to allow permissive cycling throughout Wanstead Park on surfaced paths. Park users will be consulted as part of the process to ensure local feedback on any proposals.

Implementation

The action plan below shows year 1 & 2 actions that are within budget. Longer term actions, such as path improvements, dedicated cycle ways and other infrastructure will be outside of normal budget parameters and will need additional resource through fundraising and income generation.

Action	Deadline	Responsible Officer
Promotion of Cycling Code of Conduct	Dec 2020	Head of Visitor Services
Detailed defining of Exclusion Zones prioritised by degrees of damage.	Dec 2020	Head of Conservation
Communication of these through signage and physical indicators (e.g. posts)	March 2021	Head of Visitor Services Head of Operations
Engagement with cycling users and groups	June 2021	Head of Visitor Services
Work with partners to increase cycle hire and cycling infrastructure	2021	Head of Visitor Services
Review of permissive cycling in Wanstead Park	July 2021	Head of Conservation
Preparation and promotion of a circular route for cycling	July 2021	Head of Visitor Services Head of Operations

List of appendices

28. Appendix 1 - Cycling Code of Conduct

References

- ⁱ Epping Forest Strategy, 'London's Great Forest' (2020 – 2030) *(Insert Link when live)*
- ⁱⁱ Paths Policy 2020
- ⁱⁱⁱ *ibid*
- ^{iv} Epping Forest Byelaws & Additional Byelaws (1980/1986); 3(10) *Driving, moving, or using a bicycle, tricycle or vehicle upon the Forest to the danger, injury, annoyance or inconvenience of the public*.
- ^v Epping Forest Byelaws & Additional Byelaws (1980/1986); 3(45) *Making any improper or offensive use of the Forest or doing anything tending to the injury or disfigurement thereof or to the defeat of the general purposes of the Epping Forest Act 1878 or of these byelaws & Site of Scientific Interest (Epping Forest) Potentially Damaging Operations* [OLD1001814] point 21.
- ^{vi} <https://www.cityoflondon.gov.uk/things-to-do/green-spaces/epping-forest/activities-in-epping-forest/cycling-in-epping-forest> (also appendix 1)
- ^{vii} Epping Forest Act 1878 principle duty *(insert link when live)*
- ^{viii} New homes proposed within local plans - 27,000 Waltham Forest Local Plan (2020-2035), 12,000 Redbridge Local Plan (2015-2030) & 39,000 Newham Local Plan (2017-2033)

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Committee(s): Epping Forest Consultative Committee	Date(s): 21/10/2020
Subject: Wanstead Park Ponds Project – Initial Engineering Assessment	Public
Report of: Director of Open Spaces	For Information
Report author: Tim Munday	

Summary

The initial engineering assessment of the chain of ponds at Wanstead Park has now been concluded. The aim of the study was to establish if the dam structures were sufficient to meet the requirements for High Risk 'Large Raised Reservoirs' and determine what work, if any, may need to be undertaken. The report by the Panel Engineer (Appendix 1) has made recommendations regarding each of the ponds. The recommended works are not as extensive as was initially perceived to be the case at the start of the project. This is due in part due to the categorisation of the ponds which has meant that the requirements for the dam structures are less than anticipated.

It is proposed to carry out the recommended works in full. One recommendation is to conduct a further study into the interaction of the River Roding and Ornamental Water, which presents the opportunity to seriously consider the future water supply to the lakes. So that this can be fully taken account of and to inform the future project options, it is being proposed that this is done ahead of moving to the next project gateway. To enable this an Issues Report will be required to amend the scope and budget for the project.

Recommendation(s)

Members are asked to:

- Note this report.
- Note the Panel Engineer's recommendations

Main Report

Background

1. Wanstead Park is East London's oldest public park and considered to be London's greatest surviving designed waterscape. At its most extensive (circa

1800) there were nine artificial lakes within the Park. Five lakes remain today and form a cascade with the lower four lakes the responsibility of the City of London Corporation. A substantial proportion of the Park and Out Park were added to Epping Forest by the City Corporation between 1876 and 1880. In 2001 the Park was designated a Grade II* – ‘a garden of special interest’ - Registered Park and Garden (RPG) by English Heritage (now Historic England), following an earlier Grade II designation in 1987. Since 2009 Wanstead Park has been on Historic England’s Heritage at Risk Register (HARR).

2. Wanstead Park faces four key challenges to its continued integrity.
Heritage - The Park was placed on the Heritage at Risk Register in 2009 due to differences in management by the four owners and the deteriorating condition of the Park’s heritage features.
Water Supply - The largely City-owned lake cascade at the heart of the listed landscape has a long-term negative water budget with insufficient inflow and widespread leakage which is currently augmented by aquifer pumping and is likely to see future reductions in abstraction permissions if the water holding capacity of the lakes is not stabilised.
Local Flooding - The Park is also at risk of occasional flooding from the River Roding and the City Corporation has been identified since 2012 as a private riparian owner expected to match fund in partnership upstream flood alleviation works grant-aided by DEFRA
Reservoir Safety – In 2018, The Environment Agency designated three of the cascade’s lakes, for which the City Corporation is the reservoir owner, as ‘High Risk’ in a risk assessment of dam safety during Probable Maximum Floods.
3. The Wanstead Park Ponds Project was initiated in July 2019 as a Gateway 2 project to fulfil the City Corporation’s statutory duties as the reservoir owner of the ponds at Wanstead Park and to identify the solutions to achieving this and other works in the Wanstead Parkland Plan, contributing to the removal of the Heritage at Risk status of the listed landscape. This was required following the Environment Agency’s designation of the Large Raised Reservoirs as being ‘High Risk’.
4. Dams and Reservoirs Limited, and their Panel Engineer were contracted to undertake an initial engineering assessment of the four ponds (Shoulder of Mutton, Heronry, Perch and Ornamental Water). This was to establish the requirement for each of the pond structures and if they were currently able to safely overtop. It was expected that the requirement would be assessed against the Probable Maximum Flood, as had been the case for the Hampstead Heath Ponds Project.
5. In November 2019 a survey of the four ponds and their structures was undertaken to provide data for the initial engineering assessment and flood routing calculations.

Current Position

6. The final report (Appendix 1) from the Panel Engineer was received in August 2020. In this report the reason for the Category allocated to each of the dams is

explained. The dams of Shoulder of Mutton, Heronry and Perch are Category C, as the consequence of failure would post negligible risk to life and cause limited damage. Ornamental Water, the lowest pond in the cascade, has a Category D dam, as the consequence of failure is where no loss of life can be foreseen as a result of breach and very limited additional damage would be caused. The cascading nature of the dams has been considered in the assessment and report.

7. The Safety Check Flood and Design Flood for Category C and D dams is lower intensity flood event than the Probable Maximum Flood previously anticipated to be required. As such the requirements for the dams is to pass less extreme design and safety check flood events than was the case at Hampstead Heath.
8. The report also notes that some owners of dams decide to provide a higher degree of protection for a number of reasons; this could include an understanding that the marginal cost of providing higher protection is not very much, or the organisation does not want to suffer any reputational loss should a dam fail. This is not considered to be necessary in this case and the categories assigned and the level of protection required are considered by Dams and Reservoirs Ltd to be appropriate.
9. The report notes that Shoulder of Mutton and Ornamental Water both overtop in their design floods and that further works are required to ensure this occurs safely. Work is also recommended at Heronry and Perch to support ongoing and future good maintenance of the dams. The works recommended are summarised in Table 1.

Pond	Recommendations
Shoulder of Mutton	<ul style="list-style-type: none"> - Regulation of the dam's crest. - Maintenance of short grass cover to dam's embankment.
Heronry	<ul style="list-style-type: none"> - Regulation of the dam's crest. - Installation of a concrete edging beam. - Grass improvement to the dam's embankment. - Regrading of the dam's embankment.
Perch	<ul style="list-style-type: none"> - Regulation of the dam's crest. - Installation of a concrete edging beam.
Ornamental Water	<ul style="list-style-type: none"> - Ensuring the overtopping occurs only at overflow embankment. - Regulation of the dam's crest. - An 'engineered' reinforced grass system to the overflow embankment's downstream face. - A further study to understand the effects of the interaction with the River Roding.

Table 1: Summary of Panel Engineer's Recommendations

10. The Panel Engineer has highlighted that in the case of the Ornamental Water the interaction with the adjacent River Roding maybe a governing factor, and that erosion from flooding from the Roding may be a greater risk to the dam then from overtopping. The Ornamental Water sits in the flood zone of the River Roding. The Panel Engineer has recommended a further study to understand this interaction.
11. This study would also be an opportunity to consider the water supply to the ponds including the possibility and implications on reservoir safety of re-establishing the pumping house to the River Roding. The lakes have long term issues with water supply and this issue has been noted as a major factor in the park's Heritage at Risk status.
12. It is preferable to undertake this study ahead of proceeding to the next gateway as it will have a material impact on determining the options considered at that stage. To enable this, an Issues Report extending this stage of the project will be considered by Corporate Projects Board, Projects Sub and the Epping Forest and Commons Committee. This will require the reallocation of unspent budget and a possible request for further funding. At the time of writing the exact cost of the study is still to be confirmed. It will also result in a delay to the project's timeline, with the expectation that project will now move to the next gateway in early 2021.
13. The process of appointing a Communications Officer for the Project is underway and when this person is in post they will assist stakeholders with understanding the Panel Engineer's report and its implications for the project.
14. The Panel Engineer has estimated the costs for the recommended works on site to be approximately £500 000. The estimated total cost of the project is now likely to be up to £1 million. This is significantly less than was anticipated for the project initially which was £8-12 million, this will be noted in the Issues Report.

Options

15. It would be possible to proceed to the next gateway and delay the recommended study. But it is likely that the study outcomes will have a significant impact on the options considered at Gateway 3 and would include a significant risk that the options proposed for work to improve the Ornamental Water would be ineffective and that further work would then be required. This is not being proposed.
16. Other options include undertaking the study but without considering implications to the future water supply, incorporating water supply options into study or considering the possibility of treating the dams as a higher category. Each option would require an Issues Report to change the current project.

Proposals

17. It proposed that a study is undertaken as recommended by the Panel Engineer, and that this should include reviewing possible options for future water supply. This should be done ahead of progressing to Gateway 3.

Corporate & Strategic Implications

18. This would, under the guidance of the Panel Engineer, continue to progress the fulfilment of the City Corporation's statutory duties as a reservoir owner.
19. This will continue to contribute to the Corporate Plans outcomes that people are safe and feel safe, that our spaces are secure, resilient and well-maintained and that our physical spaces have clean air, land and water and support a thriving and sustainable natural environment.
20. This will ensure that the project continues to deliver the Open Spaces business plan objectives that our open spaces, heritage and cultural assets are protected, conserved and enhanced, that London has clean air and mitigates flood risk and climate change and that our spaces are accessible, inclusive and safe.

Implications

21. The further study will need to be funded by the reallocation of £40 000 worth of currently unallocated underspend from the initial engineering assessment fees and may require additional funding.
22. The further study will also delay the progression to the next gateway by approximately 3-6 months. But will enable a higher level of confidence in the options presented at that stage.
23. Continued action is required to give the Environment Agency confidence that the City Corporation are addressing the concerns related to the 'High Risk' status of the Large Raised Reservoirs. If the City Corporation fails to comply with a recommendation of the Inspecting Engineer, the Environment Agency have statutory enforcement powers.

Conclusion

24. The Initial Engineering Assessment has identified works required to ensure that the cascade of ponds at Wanstead Park safely fulfil the requirements for their category of dams. This is to pass a less extreme design/safety flood than anticipated. It has also led to the recommendation that a further study should be undertaken to understand the interaction between the Ornamental Water and the River Roding.
25. It is proposed that this study is undertaken before the project progresses to the next gateway and that it should be used as an opportunity to investigate the feasibility and implications for possibly options to the lakes long-term water supply issues.
26. To enable this an Issues Report will need to be considered by the appropriate committees. This report will address the recommendations of the Panel Engineer, request the reallocation of funding and additional funding and notify the committees to the implications to the project timeline and overall project budget.

Appendices

- Appendix 1 – Wanstead Park Ponds Flood Study

Background Papers

Wanstead Park Ponds Project – Project Briefing

Wanstead Park Ponds Project – Gateway 2 Report

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Wanstead Park Ponds Flood Study

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1 Introduction

1.1 Purpose of Study

Wanstead Park contains four reservoirs in cascade which are classified as large raised reservoirs under the provisions of the Reservoirs Act 1975. These are:

- Shoulder of Mutton Pond (Category C),
- Heronry Pond (Category C),
- Perch Pond (Category C) and
- Ornamental Water (Category D).

The meaning of the categorisation will be explained in later sections.

These reservoirs have not been subject to a flood study since the introduction of the current standards as set out in the 4th Edition of "Floods and Reservoir Safety" (FRS4) or the release of the FEH 2013 rainfall depth model.

1.2 Location

The lakes are located in Wanstead Park in the London Borough of Redbridge, as shown in *Figure 1 and Figure 2*.

Wanstead Park is in the middle of a heavily built up area of London. The River Roding runs down the north east boundary of the Park and Ornamental Water is in the flood plain of the Roding. "The Basin" is also a reservoir under the Act but is in separate ownership and is considered to have no net effect on the flood safety of the downstream reservoirs.

For clarity the 'Basin' is situated on the golf club to the west of the chain and was inspected by myself recently. It appears to be fed by an urban drainage system to the northwest and there are two small piped feeds into the reservoir. As a result, the catchment to the north of the A12 and indeed Overton Drive as shown.

1.3 Classification of the Reservoirs

The reservoirs are classified as 'High Risk' by the EA. This definition is such that a high risk reservoir must be considered so if, *'in the event of an uncontrolled release of water from the reservoir, human life could be endangered'* (Clause 2C(i) of the Reservoirs Act 1975 as modified by the Flood and Water Management Act 2010).

The designation of High Risk involving the situation where human life could be 'endangered' applies if:

- the likely loss of life is greater or equal to one;
- the rate of flow is greater than or equal to 3 m³/s per metres (this is when structural damage is likely to occur);
- there is a significant population at risk of flooding to say more than 200 people or 20 businesses within the downstream flood plan;
- it also includes where infrastructure could lead to direct loss of life which could include destruction or flooding of road and rail infrastructure.

The designation High Risk or Low Risk in England merely defines whether the reservoir is subject to the legislation or not. High Risk reservoirs are subject to the legislation and Low Risk reservoirs are not. This classification is at the moment for reservoirs which hold more than 25,000 cubic metres of water above the level of the natural ground.

So, Michael Pitt's report after the 2007 floods led to suggestions to modify the Reservoirs Act 1975 and provision is made in the Flood and Management Act, 2010 to bring about amendments.

One of the amendments, which has been adopted by Wales (who has the same legislation) is the reduction in qualifying capacity to 10,000 cubic metres. The English Government is still considering this matter but at the moment is unlikely to bring in the 10,000 capacity criteria, and so 25,000 cubic metres exists.

Another suggestion was for cascades of reservoirs, such as that at Wanstead, where the capacity considered would be the total volume of water in the cascade – so you could have a situation where the volume of an individual reservoir means that the reservoir is not subject to the Reservoirs Act 1975 but because of the domino effect the total volume is more than 25,000 cubic metres (or 10,000 cubic metres if brought in) – where one dam fails and that causes the next dam downstream to fail and so on.

Once subject to the Act each reservoir is considered by the Inspecting Engineer during his 10 yearly inspection and what the consequence of failure would be.

The higher the consequence of failure then the plan is protected against larger and larger flood events. Where the failure would result in the loss of 10 or more lives then the dam has to be able to pass the most extreme event possible – the Probable Maximum Flood (PMF) – without the dam failing i.e. reducing the probability of a failure due to a flood to a very small number. The PMF has a return period of about 1 in 400,000 years.

As the consequence of failure reduces then one is able to spend less money to pass a lesser flood. However, the adoption of a lesser flood at a particular site does not mean that the flood event will be exceeded at that site and cause failure of the dam.

In some cases, owners of dams decide to provide a higher degree of protection for a number of reasons. This could include an understanding that the marginal cost of providing higher protection is not very much, or the organisation does not want to suffer any reputational loss should a dam fail.

The classification with regard to floods is as follows:

Dam Category	Consequence of failure	Safety Check Flood Flood inflow	Design Flood Flood Inflow
A	Where a breach could endanger lives in a community	PMF	10,000 year flood
B	Where a breach (i) could endanger lives not in a community, or (ii) could result in extensive damage	10,000 year flood	1,000 year flood
C	Where a breach would post negligible risk to life and cause limited damage	1,000 year flood	150 year flood
D	Special cases where no loss of life can be foreseen as a result of a breach and very limited additional flood damage would be caused	150 year flood	150 year flood

- **Design flood** - is the inflow that must be discharged under normal conditions with a safety margin provided by an accepted freeboard limit. This means that the water level in the reservoir rises but does not reach the top of the dam and start flowing over it. For an earthfill dam this could result in a situation where erosion of the downstream face takes place which if it continues could cause failure of the dam.
- **Safety Check flood** – the inflow beyond which the safety of the dam cannot be assured. This means water goes over the dam and overtopping is likely to occur and cause damage to the dam and it could fail as a result.

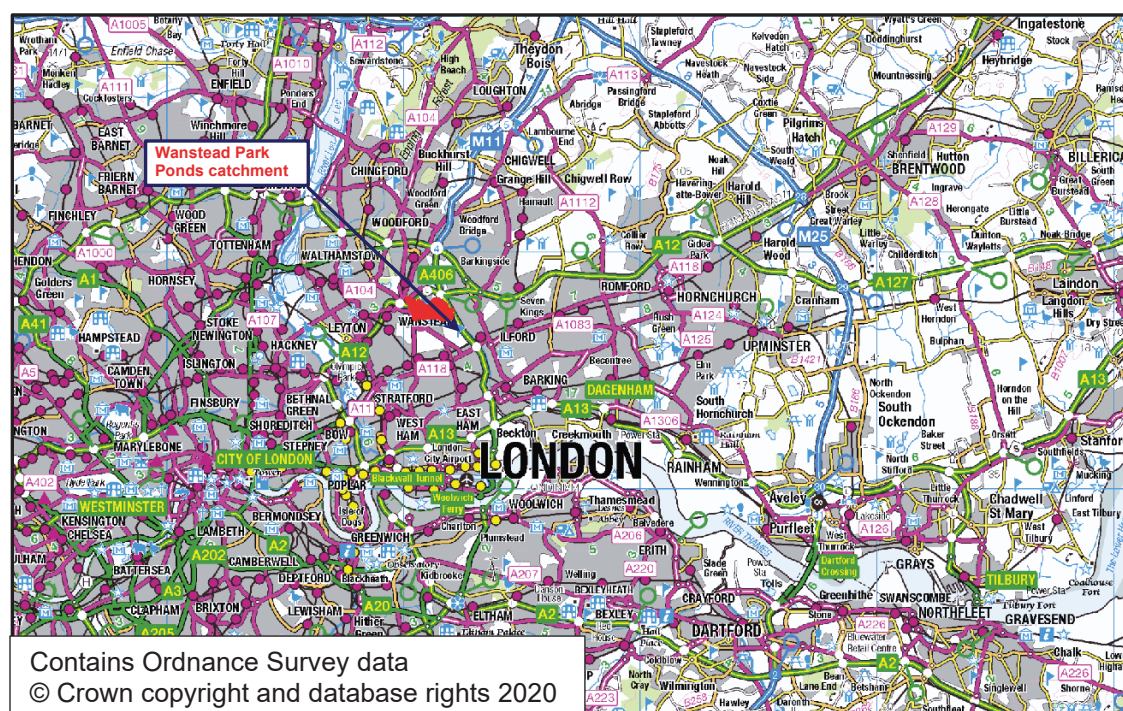
Thus, to try to prevent a failure of any earthfill dam due to floods one would design to the highest standard – the Probable Maximum Flood.

1.4 Key Catchment Characteristics

	Perch Pond (gross catchment)	Ornamental Water (gross catchment)
NGR (for FEH-Web Service catchment)	TQ 41900 87150	TQ 41500 88050
Catchment Area from FEH-Web Service (km ²)	0.855	1.4725
SAAR (mm)	602	601
SPRHOST (%)	22.66	24.26

1.5 Key Lake Characteristics

	Shoulder of Mutton Pond	Heronry Pond	Perch Pond	Ornamental Water
Water area from 2019 survey (m ²)	10,488	31,379	21,566	51,338
Water area shown by OS mapping	11,366	23,465	19,518	65,021
Previous estimates of water area	N/A	35,600 (Wren Group)	22,000 (Record sheet))	55,700 (Record Sheet)
Overflow level from 2019 survey (m OD)	14.20 (IL of 225mm pipe)	12.65 (sill in front of piped outlet)	11.425 (sill in front of piped outlet)	6.66 (sill in front of piped outlet)
Minimum crest elevation of Dam (m OD)	14.50 (2019 survey)	13.82 (2019 Survey & 0.5m LiDAR)	11.94 (2019 survey)	6.73 (0.5m LiDAR; from "The Canal" to the overflow)



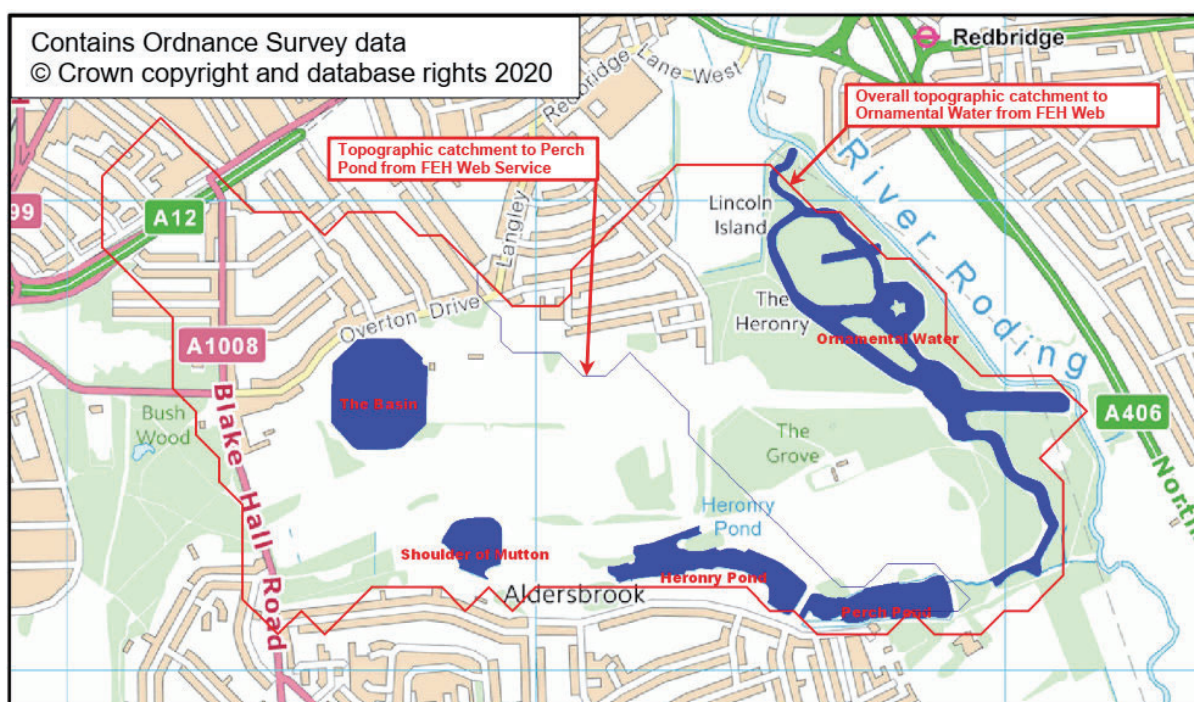


Figure 2 – Wanstead Park Ponds – Catchment Boundaries

2 Flood Assessment

2.1 Basis for Design Flood Inflow Calculations

The standard approach to spillway design flood estimation requires the use of topographic and hydrological parameters derived using the Flood Estimation Handbook (FEH) methodology as implemented in the FEH Web Service. This methodology makes use of a 100 metre resolution gridded ground model to define catchment areas, drainage paths and slopes.

The original UK Government guidelines for reservoir safety flood estimation combined the Flood Estimation Handbook (FEH) rainfall-runoff modelling technique with the rainfall depth assessment techniques previously proposed in the Flood Studies Report (FSR). This approach arose from observations that the rainfall figures, and corresponding flood flows, given by the FEH were sometimes considerably in excess of the FSR figures, particularly when considering events with return periods of some hundreds of years, upwards. The Probable Maximum Flood (PMF) was however still to be determined using the methodology set out in the FEH.

This approach has now been augmented by the “Flood Estimation Handbook Web Service”, launched in 2015, which provides “FEH2013” rainfall depth estimates which are intended to replace both the original FEH rainfall depth estimates, now referred to as “FEH1999”, and the FSR rainfall depth estimates. T-year floods (150 year, 1000 year and 10,000 year return periods) are now calculated following the FEH rainfall-runoff methodology but using the FEH2013 rainfall depth estimates.

2.2 Selection of Appropriate Flood Magnitudes

Table 2.1 of FRS4 indicates that a Category C dam should be able to accommodate a 150 year flood with no wave overtopping and pass a 1000 year flood safely. A Category D dam is required to be able to pass a 150 year flood safely. Acceptable overtopping rates are given in FRS4 together with a recommended assessment methodology.

Since publication of FRS4 in 2015, further guidance on wave overtopping flows has been published in the EurOTop manual, as set out in Figure 3. The most significant aspect of this update is that grassed embankments are deemed not to be at risk from overtopping flows when the significant wave height is less than 0.3 metres.

Table 3.1 Limits for wave overtopping for structural design of breakwaters, seawalls, dikes and dams

Hazard type and reason	Mean discharge q (l/s per m)	Max volume V_{max} (l per m)
Rubble mound breakwaters; $H_{m0} > 5$ m; no damage	1	2,000-3,000
Rubble mound breakwaters; $H_{m0} > 5$ m; rear side designed for wave overtopping	5-10	10,000-20,000
Grass covered crest and landward slope; maintained and closed grass cover; $H_{m0} = 1 - 3$ m	5	2,000-3,000
Grass covered crest and landward slope; not maintained grass cover, open spots, moss, bare patches; $H_{m0} = 0.5 - 3$ m	0.1	500
Grass covered crest and landward slope; $H_{m0} < 1$ m	5-10	500
Grass covered crest and landward slope; $H_{m0} < 0.3$ m	No limit	No limit

Figure 3 – Limits for wave overtopping from EurOTop ‘Wave Overtopping of Sea Defences and Related Structures - Assessment Manual’ – 2nd Edition (2016) Table 3.1

2.3 Catchment Area Allocation

The gross catchment to Ornamental Water, given by the FEH Web Service, is 1.4725 km² and is shown outlined in red in Figure 2. The equivalent catchment to Perch Pond is 0.855 km² and the sub-catchment boundary is shown in black in Figure 2, whence the intermediate catchment between the two lakes is 0.6175 km².

On the same basis, the incremental area between Perch Pond and Heronry Pond is 0.045 km², the area between Heronry and Shoulder of Mutton ponds is 0.21 km² and the area upstream from Shoulder of Mutton is 0.60 km². It should be noted that the latter includes “The Basin” which is assumed to have no net effect on flood flows.

These areas have been reviewed against LiDAR elevation data and appear to be realistic, though the fringes of the catchment are significantly affected by urban development. The area is too flat for OS contours to be of use in defining catchment areas at this scale. It is considered that the Web Service areas are appropriate for reservoir safety flood calculations.

According to the S10 report for Ornamental Water, the 1984 record sheet stated that the catchment area of Ornamental Water was 2.61 km² of which 2.18 km² drained through Perch Pond, making the intermediate catchment between Perch Pond and Ornamental Water 0.43 km². The basis for those rather larger areas is not known but it is likely that a proportion of the, now urbanised, area to the south was originally seen as draining towards the Park; the reduction in gross catchment area relative to the earlier assessment is 1.1375 km².

From current OS mapping, the urban area immediately to the south of Wanstead Park is about 0.57 km². That area is essentially level and it is likely that a significant proportion of its surface water drainage could actually be directed towards the ponds. Despite this, the combination of flat gradients and continuous lines of houses across the possible flow routes is likely to make peak flood flows from the area relatively small. It would however be appropriate to take the potential for a flow component from this area into account when considering any possible works to the pond spillways. As an initial estimate of this effect, the gross catchment to Perch Pond has been increased by half this additional urban area to 1.140 km².

2.4 Flood Inflow Allocation

Following initial trial assessments, it was concluded that the most appropriate methodology would be to distribute the overall flood flows from the catchment to Perch Pond between the top three reservoirs in proportion to their direct catchment areas. The inflow to Ornamental Water is then the sum of the outflow from Perch Pond and flow from the Perch Pond to Ornamental Water intermediate catchment factored by area from the overall catchment to Ornamental Water flows.

2.5 Flood Routing Parameters

For the purposes of flood routing through a reservoir it is necessary to estimate the storage available above the overflow level and the hydraulic characteristics of the overflow arrangements.

The latest figures for the lake areas are set out in Section 1.5, above. There has been some variation in the areas quoted over time which may reflect siltation, weed growth and/or fluctuating retained water levels. For consistency, the areas given by the 2019 survey have been adopted for flood routing purposes, without allowance for increasing area with elevation.

For each pond, the dam crest has been treated as a weir with a conservative discharge coefficient of 1.4 and a profile based on a combination of ground survey and 0.5 metres LiDAR elevation data.

The Shoulder of Mutton overflow is modelled by treating the twin 225mm dia. overflow pipes as orifices. The other three pond overflows are all modelled as a weir flowed by a nominal storage connected to the next pond, or the downstream boundary, by an orifice representing the overflow pipe.

In the case of Ornamental Water, the downstream condition is initially modelled by an arbitrary fixed water elevation of 6.00 metres OD. This should ideally be replaced by water levels of an appropriate return period in the River Roding at that location, though it should be noted that Ornamental Water falls within the flood plain of the Roding and is likely to be entirely flooded from the Roding in a 100 year flood on that watercourse

2.6 Event Duration

Initial trials showed that the critical event duration varied substantially across the four lakes. The routing has therefore been carried out for a range of events of 3.5, 5.5, 7.5 and 10.5 hours in duration, based on a nominal lag for Shoulder of Mutton up to 4 hours for Heronry.

2.7 Flood Assessment and Routing Results

Shoulder of Mutton Pond	Event Duration	Rainfall Depth	Peak Flood Inflow from upstream lake	Peak Flood Inflow from direct (intermediate) catchment	Peak wave-free water level	Maximum rise above overflow level (14.20 mOD)	Maximum discharge from overflow	Maximum discharge over dam crest
Event:	hours	mm	m ³ /s	m ³ /s	m OD	m	m ³ /s	m ³ /s
10,000 year FEH2013 flood:	3.5	168	N/A	3.84	14.71	0.51	0.16	3.67
	5.5	185	N/A	3.67	14.71	0.51	0.16	3.51
	7.5	195	N/A	3.37	14.70	0.50	0.16	3.20
	10.5	203	N/A	2.91	14.69	0.49	0.16	2.75
1000 year FEH2013 flood:	3.5	121	N/A	2.50	14.67	0.47	0.15	2.34
	5.5	136	N/A	2.44	14.67	0.47	0.15	2.29
	7.5	145	N/A	2.26	14.66	0.46	0.15	2.10
	10.5	152	N/A	1.95	14.65	0.45	0.15	1.81
150 year FEH2013 flood:	3.5	83	N/A	1.54	14.63	0.41	0.14	1.39
	5.5	95	N/A	1.53	14.63	0.41	0.14	1.38
	7.5	102	N/A	1.43	14.63	0.41	0.14	1.28
	10.5	108	N/A	1.25	14.62	0.40	0.14	1.09

Figure 4 – Initial Flood Routing – Existing Conditions – Shoulder of Mutton Pond

Heronry Pond	Event Duration	Rainfall Depth	Peak Flood Inflow from upstream lake	Peak Flood Inflow from direct (intermediate) catchment	Peak wave-free water level	Maximum rise above weir level (12.65 mOD)	Maximum discharge from overflow	Maximum discharge over dam crest
Event:	hours	mm	m ³ /s	m ³ /s	m OD	m	m ³ /s	m ³ /s
10,000 year FEH2013 flood:	3.5	168	3.83	1.34	13.94	1.29	0.59	0.98
	5.5	185	3.67	1.29	13.97	1.32	0.60	1.98
	7.5	195	3.36	1.18	13.98	1.33	0.60	2.11
	10.5	203	2.91	1.02	13.97	1.32	0.60	1.94
1000 year FEH2013 flood:	3.5	121	2.49	0.87	13.49	0.84	0.45	0.0
	5.5	136	2.44	0.86	13.62	0.97	0.49	0.0
	7.5	145	2.25	0.79	13.67	1.02	0.51	0.0
	10.5	152	1.96	0.69	13.70	1.05	0.52	0.0
150 year FEH2013 flood:	3.5	83	1.53	0.54	13.13	0.48	0.31	0.0
	5.5	95	1.52	0.53	13.22	0.57	0.34	0.0
	7.5	102	1.42	0.50	13.26	0.59	0.36	0.0
	10.5	108	1.23	0.44	13.28	0.61	0.37	0.0

Figure 5 – Initial Flood Routing – Existing Conditions – Heronry Pond

Perch Pond	Event Duration	Rainfall Depth	Peak Flood Inflow from upstream lake	Peak Flood Inflow from direct (intermediate) catchment	Peak wave-free water level	Maximum rise above weir level (11.425 mOD)	Maximum discharge from overflow	Maximum discharge over dam crest
Event:	hours	mm	m ³ /s	m ³ /s	m OD	m	m ³ /s	m ³ /s
10,000 year FEH2013 flood:	3.5	168	1.57	0.28	11.65	0.23	1.21	0.00
	5.5	185	2.58	0.27	11.77	0.35	1.57	0.00
	7.5	195	2.71	0.25	11.82	0.40	1.61	0.00
	10.5	203	2.54	0.22	11.81	0.39	1.61	0.00
1000 year FEH2013 flood:	3.5	121	0.45	0.18	11.54	0.12	0.46	0.00
	5.5	136	0.49	0.18	11.55	0.13	0.51	0.00
	7.5	145	0.51	0.17	11.56	0.14	0.54	0.00
	10.5	152	0.52	0.15	11.56	0.14	0.55	0.00
150 year FEH2013 flood:	3.5	83	0.31	0.11	11.51	0.09	0.30	0.00
	5.5	95	0.34	0.11	11.52	0.10	0.34	0.00
	7.5	102	0.36	0.11	11.53	0.11	0.36	0.00
	10.5	108	0.37	0.09	11.53	0.11	0.38	0.00

Figure 6 – Initial Flood Routing – Existing Conditions – Perch Pond

Ornamental Water	Event Duration	Rainfall Depth	Peak Flood Inflow from upstream lake	Peak Flood Inflow from direct (intermediate) catchment	Peak wave-free water level	Maximum rise above weir level (6.66 mOD)	Maximum discharge from overflow	Maximum discharge over dam crest
Event:	hours	mm	m ³ /s	m ³ /s	m OD	m	m ³ /s	m ³ /s
10,000 year FEH2013 flood:	3.5	168	1.21	2.39	6.92	0.26	1.48	1.03
	5.5	185	1.57	2.41	6.94	0.28	1.50	1.58
	7.5	195	1.61	2.27	6.95	0.29	1.50	1.62
	10.5	203	1.61	2.03	6.94	0.28	1.50	1.48
1000 year FEH2013 flood:	3.5	121	0.46	1.55	6.86	0.20	1.10	0.34
	5.5	136	0.51	1.60	6.87	0.21	1.20	0.44
	7.5	145	0.54	1.52	6.88	0.22	1.21	0.45
	10.5	152	0.55	1.37	6.87	0.21	1.18	0.41
150 year FEH2013 flood:	3.5	83	0.30	0.95	6.81	0.15	0.68	0.08
	5.5	95	0.34	1.00	6.82	0.16	0.77	0.12
	7.5	102	0.36	0.96	6.82	0.16	0.80	0.14
	10.5	108	0.38	0.87	6.82	0.16	0.79	0.13

Figure 7 – Initial Flood Routing – Existing Conditions – Ornamental Water

3 Ornamental Water and EA Flood Information

3.1 EA Flood Zones and River Levels

Figure 8 shows the location of Ornamental Water relative to the Environment Agency's Flood Map for Planning (Rivers and Sea) Flood Zones 2 and 3, February 2020 release. It is clear that Ornamental Water falls entirely within Flood Zone 2 where flooding is expected, on average, once in 1000 years.

Flood elevations from the modelling used as the basis for the flood zones have been obtained from the EA and can be found in Appendix B to this report. Water levels for selected locations are also shown in Figure 8.

Comparison with the lake flood levels in Figure 7 shows that the maximum calculated level of 6.95metres OD in a10,000 year event is only 0.43 metres above the 1 in 100 flood level in the adjacent main river as estimated by the EA. Additionally, the 1000 year river levels are above the surveyed embankment levels for Ornamental Water.



Figure 8 – Flood Zone Mapping and Ornamental Water

4 Conclusions

The results are taken in turn from the top of the cascade.

4.1 Shoulder of Mutton

One can see that, for the Shoulder of Mutton, which is a very low embankment at the top of the cascade, is overtopped during the 1000 year event by about 5.5 hrs with a maximum discharge of about 2.3 cumecs. This sort of flow could be easily accommodated over the long low embankment as long as the grass cover is good without any significant damage. The embankment is likely to withstand the safety check flood without failure, as long as the embankment crest is kept as level as possible and the grass cover is maintained and the grass cut short.

Works here should include some regulation of the crest at the left-hand end (when viewed looking downstream).

4.2 Heronry Pond

At Heronry Pond, the safety check flood causes the water level to rise but the 1,000 year event is retained within the embankment and no overtopping occurs and the still water flood event stays within the embankment crest.

Even in the 10,000 year event the embankment is only overtopped for 5 hrs or so by up to 2 cumecs. Again, an embankment of this size, with a level crest and a good grass cover might be damaged, but is not likely to fail. It would be necessary to try to keep the crest level, and to maintain a good grass cover on the downstream face.

Here works would include regulation of the crest and installation of a concrete edging beam to 'control' the flow. Grass improvement and some regrading of the downstream face would be beneficial.

4.3 Perch Pond

The next reservoir in the cascade has a significant surface area, albeit smaller than Heronry Pond, and a freeboard which is able to absorb the inflow from both the 1,000 and 10,000 year events.

Some benefit would be advised by regulating the crest, raising the crest at the right-hand end and installation of a concrete edging beam to again control the flow.

4.4 Ornamental Pond

Here there is significant overtopping in the 1,000 year and 10,000 year events. As a Category D dam, the safety check flood and design flood is the 150 year event, which fills the reservoir and causes a small degree of overtopping.

The interaction of the dam within the River Roding could mean that there is a greater risk of erosion from the Roding rather than from the dams above.

Thus, I recommend a study be undertaken to understand the effect of the interaction of the River Roding and works which might be put into effect not only to protect the structure from failure of the dams or from flooding from the River Roding.

4.5 Summary

My recommendation to safeguard the system of reservoirs, is to ensure that the levels of the embankment at the river are such that overtopping occurs only at the 'overflow embankment' and here the crest is regulated and the downstream face is 'engineered' with a reinforced grass system to provide some erosion resistance.

The City of London should consider these reservoirs as a formal cascade in which case it might be sensible to do elements of improving the resilience of dams on the cascade to cope with the larger floods and protect the reputation of the City.

5 Costings

A very rough estimation of costings are as follows (including preliminaries).

	<u>Costings</u>	<u>Consideration as a cascade</u>
Shoulder of Mutton	£40k	£40k
Heronry Pond	£60k	£150k
Perch Pond	£60k	£150k
Ornamental Pond	£80k	£120k
Total	£240k	£460k
Say	£250k	£500k

Dr A K Hughes

Committee(s)	Dated:
Epping Forest Consultative – For consultation Epping Forest and Commons – For decision	21.10.2020 16.11.2020
Subject: The Grotto, Wanstead Park: Conservation Management Plan SEF 22/20	Public
Report of: Colin Buttery, Director of Open Spaces	For Consultation
Report author: Geoff Sinclair, Head of Operations, Epping Forest Julian Kverndal, Senior Historic Building Surveyor, City Surveyors	

Summary

The Grotto was constructed within the designed landscape of Wanstead Park as an ornamental building known as a folly, during the height of the 18th Century Picturesque Movement. The building originally consisted of a boathouse and a first floor shellwork entertaining room possibly with servant quarters at the rear. Constructed between 1769-64 by the second Earl Tylney, the building was subsequently listed Grade II in 1954, within a wider Grade II listing for the Registered Park and Garden, which was revised to Grade II* in 2001. Following a devastating fire in 1884 which destroyed much of the building, The Grotto façade has been retained as an enigmatic ruin which continues to be a popular focal point in Wanstead Park, as well as an important remaining component of the designed Parkland landscape.

The condition of the remaining elements of the Grotto are now at a point where significant interventions are required to ensure their future, with the folly being added to the Heritage at Risk Register in 2017. This report outlines the conclusions of the Grotto, Wanstead Park Conservation Management Plan prepared by Alan Baxter Ltd (Appendix 1). It is recommended that the plan be adopted as a resource to guide the management, fundraising planning and investment decisions of the Wanstead Park Project Board.

Recommendation(s)

Consultative Committee Members are asked to: -

- i. Note the report
- ii. Offer any comment on the Grotto, Wanstead Park Conservation Management Plan for consideration at the Epping Forest and Commons Committee.

Main Report

Background

1. Wanstead Park is East London's oldest public park and considered to be London's greatest surviving designed waterscape. At its most extensive (circa 1800) there were nine artificial lakes within the Park. Five lakes remain today and form a cascade with the lower four lakes administered by the City of London Corporation.
2. Following a spectacular decline in the 1820s, followed by 60 years of neglect a substantial proportion of the Park and Out Park were added to Epping Forest by the City Corporation between 1876 and 1880. Other parts of the original Park were later purchased by the London Borough of Redbridge and the Wanstead Sports Ground Limited. The City Corporation originally managed the acquisition as a formal Public Park under its 'ornamental grounds' power, before changing the management approach post-1945 to fully revert the site as part of Epping Forest
3. The Park has been subsequently listed as a Grade II* – 'a garden of special interest' - Registered Park and Garden (RPG) by English Heritage (now Historic England) in 2001, following an earlier Grade II designation in 1987 and has been on Historic England's Heritage at Risk Register (HARR) since 2009. In 1954, the Grotto and the Temple were designated as Grade II Listed Buildings, while in 1970 the Wanstead Park area, including parts of Overton Drive, was designated as a Conservation Area. The Wanstead Park Conservation Area was added to the HARR in 2010 while the Grotto was separately added to the HARR in 2017.
4. The Grotto is one of a series of follies – buildings built primarily for decoration - constructed in the Park between 1760 and 1764 by the 2nd Earl Tylney, acting as both a boat dock and shellwork entertaining room possibly with servant quarters at the rear. Grottos were natural or artificial caves which formed a decorative feature within a number of large 18th century gardens. The Grotto is located on the banks of the Ornamental Water, the largest and lowest lake in the cascade, in the eastern section of Wanstead Park. It is an enigmatic focal point situated at the boundary between the more formal early eighteenth-century landscape and the more naturalised, Picturesque, later eighteenth-century landscape. It is considered emblematic of the Park's important eighteenth-century phase of landscape design and has been a notably popular feature in the Park for visitors, both in its 18th Century heyday and for people today.
5. Only two years after it was acquired by the City Corporation the Grotto was severely damaged by a fire, which destroyed the internal rooms and left only the front façade and a few other sections of the building standing. The structure was insured for £1,000, considerably less than the cost of £2,000 for the materials alone spent in the 1760s, and it was subsequently decided by the City Corporation not to restore the Grotto.
6. The general impression of the extant Grotto structure today is that it is in a poor condition, the result of vandalism and continued decline despite various

consolidation schemes instigated to safeguard the remaining elements of the Grotto. Richard Griffiths Architects' reported on the repair and reuse of the Grotto in 2011 for the City Corporation and identified fourteen areas of concern with the Grotto Structure. Significant unknowns are the nature of the foundation of the façade wall and how the fluctuation of the water level in the Ornamental Waters affects the stability of the wall.

7. Alan Baxter Ltd were commissioned in November 2018 to liaise with key stakeholders and prepare a Conservation Management Plan (CMP) for the Grotto. The CMP approach has been developed by Historic England and the National Heritage Lottery Fund as a tool to help manage change in historic features, bringing together an understanding of what matters and why, and how to conserve and manage it. From this informed basis, plans are then used to develop programmes of repair, restoration or to draw up proposals for change
8. This report outlines the CMP prepared by Alan Baxter Ltd and presents recommendations on the next steps to be taken

Current Position

9. Wanstead Park is presently the focus of four significant project streams for the City Corporation and the other Park landowners, with the management of the Grotto sitting alongside these projects, namely:
 - a. *Heritage Management*: On the 18th November 2019, your Committee approved the Wanstead Park Parkland Plan which set out a management approach to help move towards the removal of the Park from the HARR.
 - b. *Large Raised Reservoirs*: In November 2019, after a 3-year hiatus, the Environment Agency informed the City Corporation that three of the reservoirs at Wanstead Park that hold more than 25,000 cu m of water above ground level are to be revised following a national reassessment of large raised reservoirs to a 'High Risk' Category. The implications of this change form part of an Engineering assessment being undertaken by the City Corporation's Department of the Built Environment (DBE) and was completed in September 2020.
 - c. *Flood Alleviation Scheme*: The City Corporation is a significant riparian landowner in relation to the River Roding. To better manage the flood risk in the Roding catchment at South Woodford and Wanstead, the Environment Agency is proposing the construction of a £7.5 million Flood Storage Scheme (FSS) on farmland at Ongar. The Environment Agency expects the cost of the scheme to be part-funded by riparian owners including the City Corporation on a discretionary non-statutory basis. The London Borough of Redbridge has pledged £517,000 towards the project.
 - d. *Water supply*. Detailed hydrological assessments undertaken by specialist engineers have shown that there is insufficient natural water to keep the lakes filled. Water losses from leakage and evaporation outstrip the amount of water entering the lakes and if we did not pump water into the lakes, they would ultimately be much reduced in size, if not lost. We have been advised that increasing pressure for drinking water in London could

lead to increased restrictions on our ability to pump water into the lakes. Finding a solution to this issue is an important longer-term management challenge that underlies much of the Parks future development proposals

10. A Wanstead Park Project Board was established by the Director of Open Spaces and the City Surveyor in summer 2019 to coordinate the City Corporation's response to these significant project streams.
11. The Grotto, Wanstead Park: Conservation Management Plan (CMP) is provided in full, at Appendix 1. The aim of producing the CMP is to help the City Corporation to remove the Grotto from the HARR and to help determine a successful and sustainable future for the Grotto.

Conservation Management Plan

Overview of the CMP

12. The Grotto Conservation Management Plan provides a comprehensive and interdisciplinary evaluation of the Grotto today, including a summary of existing knowledge about its historical development (Chapter 3) as well as a consideration of its current condition and ecology. This information was then shared with both internal and external stakeholders, (Chapter 2) as well as discussed at two workshops, both of which helped to clarify the requirements for removing the Grotto from the HARR and to outline a proposed medium-term solution for the Grotto's future. A series of recommended policies and an action plan to help the City Corporation to achieve this end are set out in Chapter 5.0 and Chapter 6.0 respectively.

Significance of the Grotto

13. The cultural importance of the Grotto was assessed using criteria set out in Historic England's *Conservation Principles, Policies and Guidance* (2008). This makes use of four different value groups; Evidential Value, Historic Value, Aesthetic Value and Communal Value (Page 23) with the significance assessment an amalgam of these values. Alan Baxter Ltd added a fifth value, Ecological Value, to their significance assessment process for the Grotto.
 - a. *Evidential Value* (Page 24): The Grotto offers evidence for one of the ways in which historic landscapes were embellished. This is limited by the fact that there are many other similar examples;
 - b. *Historic Value* (Page 24): The historic value of the Grotto primarily derives from its association with the Childs family and the fact that, despite its ruined state, it is one of the few legible reminders of the important mid-eighteenth century phase of landscape design. This is strengthened by two additional factors, the high level of documentation and the juxtaposition with the Temple, a contemporary structure constructed in a contrasting archaeological style;
 - c. *Aesthetic Value* (Page 26): The aesthetic value of the Grotto derives primarily from the surviving legibility of its complex design (especially the

front façade and legibility of the original structure outline (Page 27) and a unique multi-use history;

- d. *Communal Value* (Page 26): The Grotto is one of the most recognisable features of Wanstead Park today with a continuity of interest from the time of the Tylney family to the late 19th century.
- e. *Ecological Value* (Page 26): The Grotto provides ecological niches not found elsewhere in the Park with crevices and cavities in walls, arches and alcoves of particular note for bat roosts.

14. As a landscape and waterscape feature the Grotto's overall significance is fundamentally connected to its setting (Page 28) and it is highly sensitive to changes within it. Historically the setting of the Grotto at the edge of a lake and framed by dark, dense, overhanging tree cover would have added to its sense of mystery and magic. Three developments were identified which have detracted on the Grotto's overall significance:

- a. *Vegetation changes*: Over the last 5-10 years vegetation management has undermined the Grotto's role as a surprising incident that is alternatively obscured and revealed as an observer journeyed around the park;
- b. *Water Level*: The relationship of the Ornamental Water and The Grotto is of fundamental importance to its overall significance with the prolonged low water levels of the lake obsuring this key relationship;
- c. *Galvanised steel fence*: The current fence installed to protect the Grotto from Anti-Social Behaviour undermines visitor's appreciation of the Grotto.

Policy Recommendations

15. A conclusion of the CMP is that the Grotto is at a turning point in its history (Page 33). It is over a century since it was severely damaged by fire and since then the structure has continued to decline alongside the cumulative loss of material undermining the current visitors' appreciation of the Grotto's significance.

16. Working with the key stakeholders (Page 7) to identify a sustainable future for the Grotto and to see its removal from the HARR it was considered that in the medium term the City Corporation should, as far as possible, restore the façade to its eighteenth century appearance. Eight key priorities were identified (Page 33) for the City Corporation to consider:

- a. *Responsibilities and maintenance*: the split management between the City Surveyors and Epping Forest departments of the City Corporation means that careful co-ordination is required in its ongoing management and maintenance.
- b. *Structure and surviving fabric*: the works required to achieve a restored façade needs to be defined further.
- c. *Security*: one of the main concerns throughout the twentieth century has been the security around the Grotto. The location and form of these security measures needs to be carefully considered.
- d. *Accessibility*: it is proposed that the City Corporation should explore opportunities to enhance public access to the Grotto where possible.

- e. *Interpretation and presentation*: A well thought out and creative scheme of interpretation, which places the Grotto in its wider setting and context, would enhance visitors' appreciation of the Grotto's significance.
- f. *Ecology*: careful thought will be needed in order to balance the ecological and heritage significance of the Grotto
- g. *Relationship to the Ornamental Water* (immediate setting): the Grotto was designed to be seen and experienced primarily from the water. The fact that due to low water levels there is little appreciation of this relationship today detracts from the Grotto's significance. Other elements of the Grotto's immediate setting, notably planting and views also need to be taken into account.
- h. *Relationship to Wanstead Park* (wider setting): as part of a designed landscape the Grotto's relationship to the wider Park is an important consideration in its future development and management and should be seen in the context of the wider, future vision for the Park as a whole.

Options

17. Your Committee are asked to consider two options:

- 18. **Option 1**: It is proposed that the Grotto Conservation Management Plan be adopted as a resource by the Wanstead Park Project Board to guide the management of the Grotto.
- 19. The Restoration and maintenance plan (the first item in the above Action Plan table) will produce costed options, all of which should remove the Grotto from the HARR. These options, some of which will help identify potential uses of the property, will be reported to your Committee in due course, along with a recommendation to seek appropriate funding. **This option is recommended**
- 20. **Option 2**: Do not approve the use of the Grotto Conservation Management Plan in planning and developing conservation policies for the Grotto.
- 21. This would prevent progress towards stabilising the current structure with the consequent continued decline of a Grade 2 Listed Building and it will remain on the HARR. **This option is not recommended**

Action Plan

- 22. Each of the eight key priorities were made up of policies with 39 recommendations to the the City Corporation in total. Nineteen of these policies related to additional studies and reports which would contribute to the removal of the Grotto from the HARR. These were compiled into a costed prioritised 'Action Plan' (page 43) summarised in Table 1 below. This identified an essential spend of £57,500 with an annual cost of £2,750 for monitoring fabric loss, an advisable spend of £19,500 and desirable spend of £8,000.

Table 1:

Work Required	Est Cost (£)	Urgency
Restoration and maintenance plan	35,000	Essential
Structural investigations into the Grotto's foundations and historic bridge	20,000	Essential
Installation of CCTV	2,500	Essential
Monitoring loss of historic fabric	2,750/year	Essential
Feasibility Study into different potential uses of the Grotto	TBC	Essential (long-term)
Archaeological and geological recording of loose material	13,000	Advisable
Ecological surveys	4,500	Advisable
BS5837 tree survey	2,000	Advisable
Interpretation boards	8,000	Desirable

23. The remaining 20 policies relate to management procedure and process related to the Grotto, with the first policy being, "The Conservation Management Plan will be formally adopted as policy by the City Corporation as one of the principal sources of guidance in the management of the Grotto".

Corporate & Strategic Implications

24. Open Spaces Department Business Plan: The Alan Baxter Ltd Grotto CMP exercise and background research follow from three of the Open Spaces Department's Strategic aims of: providing high quality accessible open spaces, involving communities in site management and adopting sustainable working practices.
25. Corporate Plan 2018-23: The Alan Baxter Ltd Grotto CMP exercise and background research meets the objective of the Corporate Plan to provide thriving and biodiverse green spaces and urban habitats
26. Statement of Community Involvement: The City of London has consulted on the preparation of the original Conservation Statement for Wanstead Park (2011) and in 2015 consulted on the LDA Wanstead Park: Parkland Plan. The Alan Baxter Ltd Grotto CMP was prepared in consultation with key stakeholders, including The London Borough of Redbridge, Historic England, Natural England, Friends of Wanstead Parklands, The Georgian Group, The Wren Group, London Parks and Gardens Trust.
27. The Grotto is currently not subject to public access. An equalities assessment would need to address access implications once the Feasibility Study was concluded.

Financial Implications

28. An 'Essential' spend of £57,500 has been identified in the CMP. The Cyclical Works Programme (CWP) budget for 2020/2021 has allocated the sum of £65,000 towards these works. Further CWP bids for funding can be made, but with the current reviews of the CWP programme and Capital spending priorities it is likely that your Committee will need to consider wider fundraising opportunities to support any restoration of the building.
29. Grant support mechanisms. The Wanstead Park Project Board are investigating Lottery funding for works in Wanstead Park. Some of this CMP's proposals may be appropriate to form part of any Lottery funding application.

Charity Implications

30. Epping Forest is a registered charity (number 232990). Charity Law obliges Members to ensure that the decisions they take in relation to the Charity must be taken in the best interests of the Charity.

Legal Implications

31. Subject to the provisions of the Epping Forest Acts 1878 & 1880 the Conservators are under a duty at all times to keep Epping Forest uninclosed and unbuilt on as an open space for the recreation and enjoyment of the public. They are also under a duty at all times as far as possible to preserve the natural aspect of the Forest.
32. The Epping Forest Act 1880 includes an additional power at section 5 to maintain "*ornamental inclosed lands*" which most probably reflects the City's purchase of Wanstead Park in 1880 and requires the Conservators to make proper provision for securing the enjoyment thereof by the public for exercise and recreation at all reasonable times during the day.
33. The CMP has been prepared in the context of the Conservators' statutory functions.
34. Apart from general Occupiers Liability Acts responsibilities, there is no specific heritage duty on owners of registered parks and gardens to take steps to have them removed from the HARR. However, taking steps to address the issues which have led to entry on the register is consistent with the Conservators' statutory functions and objects of the charity.

Conclusion

35. It is over a century since the Grotto was severely damaged by fire and since then the remaining structure has continued to decline. The Grotto is at a turning point in its history and there is a pressing need to resolve significant concerns on the structural integrity of the remaining elements of the Grotto.

36. The Grotto is a significant and distinctive element of the Grade 2* Registered Park and Garden Wanstead Park as well as it being a Grade 2 Listed Building. The Park, Grotto and Conservation area have been included in the HARR by Historic England.
37. The CMP prepared by Alan Baxter Ltd, in consultation with key stakeholders, draws together an extensive body of research and identified a medium-term strategy that could with the correct fundraising strategy achieve the removal of Grotto from the Heritage at Risk register. It is therefore proposed that the plan be adopted as a resource to guide the investment decisions and fundraising planning of the Wanstead Park Project Board.

Background Papers

- Richard Griffiths Architects Report on the repair and reuse of The Grotto, Wanstead Park (2011)
- Wanstead Park: Landscape conservation and regeneration progress update. Epping Forest and Commons Committee, 11th May 2015
- Wanstead Park: - Briefing note for Members, Epping Forest and Commons Committee, 11th September 2017
- Wanstead Park: - Briefing note for Members (SEF 38/18), Epping Forest Consultative Committee, 10th October 2018
- Wanstead Park: Conceptual Options Plan and Cost Planning Study – Rev J

Appendices

- Appendix 1 – The Grotto, Wanstead Park Conservation Management Plan, September 2019

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Committee(s)	Dated:
Epping Forest Consultative – For Consultation Epping Forest and Commons – For Decision	21.10.2020 16.11.2020
Subject: Path Management: Policy Development Note SEF 23/20	Public
Report of: Colin Buttery, Director of Open Spaces	For Consultation
Report author: Geoff Sinclair, Head of Operations, Epping Forest	

Summary

The Epping Forest Management Strategy 2020-30 approved by your Committee in November 2019 proposed Policy development around the management of the Epping Forest public rights of way and formal and informal paths networks. Initial appraisal work has found 41km of public rights of way; 81km of managed routes and a further 76km where the City Corporation has a management responsibility.

This report outlines the Policy Development note (PDN) that has been prepared on Path Management. The property and significant management considerations described in the PDN have been outlined along with the management strategy. A revised path management process is proposed and will require ten years to transition from the current reactive to a planned management process. By adopting a phased approach that focusses on the higher public access areas first it is planned that the initial costs will be kept within current local risk budget. Wider adoption of the approach is likely to require additional resources and will be subject to a review and report to your committee before progressing.

Recommendation(s)

Epping Forest Consultative Committee Members are asked to:

- i. Note the report; and,
- ii. Offer any comment on the draft Path Management PDN for consideration at the Epping Forest and Commons Committee.

Main Report

Background

1. On the 18 November 2019, your committee approved the Epping Forest Management Strategy for the period of 2020-29. As part of the strategy existing operational activity in main geographical locations and for key activities is being reviewed.

2. The review process comprises a reappraisal of the City Corporation's (CoL) property management issues alongside other significant management considerations, to provide an overview of current practice and an outline of longer-term aspirations.
3. This report outlines the Path Management Policy Development Note (PDN) that has been prepared as part of the review.

Current Position

4. Epping Forest and the Buffer Lands stretch for over 19km (12 miles) from East London into south-west Essex. Visitors are encouraged to access the Forest and Buffer lands on foot, cycle or horseback only, with the following conditions applying:
 - a. *Pedestrians*: Visitors on foot have the right to access all areas of Epping Forest at any time of the day. Buffer Land access is permitted along Public Rights of Way (PRoW) and on Permissive Open Access sites and permissive routes.
 - b. *Cycling*: Cycling is permitted throughout the Forest except for the Scheduled Ancient Monuments (SAM) of Loughton Camp, Ambresbury Banks, Pole Hill, along Loughton Brook Regionally Important Geological Site (RIGS), around Connaught Water and on the Easy Access trails. Wanstead Park has a defined cycle route with no cycling permitted elsewhere in the park and cycling is only allowed on the Buffer Lands along Public and permissive bridleways.
 - c. *Horse riding*: Horse riding is permitted throughout the Forest, except for out-of-bounds areas marked on the horse-riding booklet/guide on payment of an annual licence. In the winter months access is limited to the surfaced ride network only. On the Buffer Land riding is on designated public and permissive bridleways only.
5. The current managed path network has developed over time, with individual routes arising from a range of initial objectives, such as improving the connectivity of the PRoW on the Buffer Lands or providing all weather routes in the Forest. Management of the different path types has, in practice, over the years been combined under the following principles:
 - a. *Natural paths*: Paths with minimal intervention to maintain their accessibility. In most cases, this path type best meets biodiversity and heritage obligations;
 - b. *All-weather routes*: Surfaced paths responding to difficult ground conditions are appropriate on routes across the Forest and Buffer Lands where there is an approved strategic management or public access need. The maintenance obligations associated with the all-weather route network influences the Charitable trust's ability to develop further all-weather provision;
 - c. *'All-ability' paths*: Installed at locations where there is a significant need for higher accessibility standard paths. The creation and maintenance costs of these significantly restricts the provision of these highly accessible all-weather routes.

6. There are 41 km of public rights of way (PRoW) in Epping Forest and the Buffer Lands. In addition, there are around 81 km of paths designated by the City of London as managed routes suitable for horse riding, cycling and walking, with some routes seasonally unavailable for riding and cycling. Across the Forest there is an unquantified network of unofficial paths. A review of the path network in 2019 identified 198 km of paths where the City of London could be considered to have a management responsibility.
7. A notable outcome of the 2019 path audit is that the managed path network is significantly greater than previously considered and that its condition is showing the effect of under maintenance. This has highlighted a need to reassess the largely reactive approach to path maintenance currently adopted.

Proposals

8. The Path Management PDN outlines the Property Management context and significant Management Considerations impacting on the management of the path network before presenting a management strategy and outline management program.

Management Strategy

9. The overall objectives for the path management program at Epping Forest are:
 - a. To have an annual management programme that ensures we meet the City of London Corporation's (COL) requirements under the Highways Act (1980) and Epping Forest path management standard specifications;
 - b. To ensure the path network accessibility is appropriate for a semi-wildland to wildland environment and Special Area for Conservation;
 - c. To integrate path management into wider operational habitat and landscape management; and,
 - d. To provide a path network in a safe condition and fit for the type of traffic which is ordinarily expected to use it.

Management Considerations

10. There are a wide range of management considerations given in the report and these have been summarised below:
 - a. Ecological: Paths and their verges can facilitate the movement of species across the Forest and historically they were a refuge for heathland and open ground species. The large extent of the path network is an opportunity to promote wildlife conservation benefits.
 - b. Heritage: The Forest's path network is set within a historic landscape long inhabited with man-made structures dated to around 500BC. A number of

paths form part of what once were a network of long used routes such as drove roads. A separate Policy Development Note will be prepared concerning the management of these historic routes in 2021/22.

- c. Access: The predominant clay soils in the Forest mean that during the 5-6 months in the winter important routes are very poor to impassable. Seasonal inaccessibility is a concern in central and southern areas where the Forest can represent the only nearby open space for many people. The forthcoming Sustainable Visitor Strategy will provide an assessment on the future shape of the access needs in the Forest.
- d. Property: Third party agencies under specific agreements have upgraded paths across the Forest. Maintenance of these paths by the third party has however been mixed over the years. The City of London's obligation under the Occupiers Liability Act 1957 indicates that management of these routes needs more active engagement with the third parties concerned to ensure that these paths are appropriately maintained.
- e. Community: The 12-mile elongated and largely linear nature of the Forest means that it passes through many communities and in many instances, it is the main public open space for the communities concerned. Access development to the Forest from these local communities has been largely organic and unplanned. It is proposed that a new Local Forest Access Point be trialled with the aim of making it more welcoming to local residents approaching on foot and the outcome assessed in terms of its impact on reducing car-based visitors.
- f. Finance: A legacy of the former reactive process is that additional works will be required to ensure paths meet the relevant specification. It can also be anticipated that additional ongoing maintenance will be required to continue to ensure paths meet the design specification. It is proposed that initially planned path management is concentrated on the higher access areas to develop a better understanding of the financial impact of the changes. Following a review and report to your committee the management process would be extended to the less busy paths. Condition monitoring would however be applied to all paths.

Property Management Context

11. The main property management issues impacting upon path management are:

- a. Tree Safety: All Official paths, natural or all-weather, and waymarked trails are managed under the Tree Safety Policy. It is proposed in the PDN that all Public Rights of Way across the Forest and Buffer Lands and Informal Paths in Wanstead Park are also included as paths managed under the Tree Safety Policy. It is proposed that for Informal Paths (excluding Wanstead Park), the tree safety response would be that a site visit will be undertaken in response to any reported problems by users to assess the situation.
- b. Statutory Designations: Many paths are within the Site of Special Scientific Interest (SSSI) and/or Special Area of Conservation (SAC) and can impact on the Registered Park and Gardens (RPG) and SAMs within the Forest

- and Buffer lands. Consents from the responsible authorities will be required for some activities;
- c. Access infrastructure: Policy and practice concerning individual access infrastructure types, eg bridges, boardwalks and culverts, is covered under the Forest Furniture Policy Development Note, which will be completed in 2021. With predominantly clay soils, the presence of drainage and the condition of the drains are a defining criterion for the condition of path surfaces. Drainage concerns have been identified in the 2019 audit for 25.5km of the official path network and it is proposed that the path drainage network be mapped and recorded, including its condition, in the next phase of the audit process;
 - d. Public liability: The relative responsibilities regarding public liability for public rights of way, formal and informal paths needs to be more clearly articulated in the future Paths Management Strategy.

Outline Management Program

12. The PDN presents an outline management program for taking forward the revised path management process. Key activities to be delivered as part of the outline management program are:
- a. Risk Monitoring: It is proposed that we considerably increase the routine monitoring of the path network and its condition. This involves two aspects of monitoring, tree safety and path condition. It is proposed that we undertake much of this with appropriately trained Volunteers.
 - b. Review: As part of the ongoing development of the revised path management process several policy and procedural reviews are proposed. A key policy review will be the appropriateness of designating all or part of the Forest and Buffer lands as Open Access Land under the CROW Act.
 - c. Improvement programme: Over the next ten years it is envisaged that there will be two possible path improvement projects. The Sustainable Visitor Strategy may identify potential changes to the path network and the encouragement of modal shift by promoting walks from public transport linked Local Forest access Points.
 - d. Finance: It is recognised that there will be some additional costs arising from the need to ensure paths meet agreed standards. This is difficult to quantify at present. It is proposed that in the first instance, and within existing resource levels, planned maintenance work focuses on the higher public access areas and this be reviewed the finding presented to your committee before possible wider adoption across the Forest. Path condition monitoring will be undertaken for all routes and safety problems responded to as required.

Corporate & Strategic Implications

13. City of London Corporate Plan 2018 - 2023: the restoration and maintenance of the internationally and nationally important habitats of Epping Forest directly underscore the *third pillar* of the Corporate Plan, which is to “*shape outstanding*

environments". The development of ISP's and PDN form part of the operational planning to achieve this aim of the Corporate Plan.

14. Open Spaces Department Business Plan 2020-21: The proposals in the PDN contribute towards meeting the following outcomes of the plan: 1,3,4,5,7,8,9 and 11.

15. No negative equality impacts were identified for this proposal.

Legal implications

16. The proposal to review landowner duty of care responsibilities will require legal consideration and this review would be developed in association with the CoL's legal team.

Financial Implications

17. The first phase of the outline management program has been framed to fit within existing levels of local risk spend. The wider application of the revised path management program across the Forest and Buffer lands will require additional resources. The first phase development process will be to quantify the longer-term resource needs and identify how they can be met. These details would be brought to your Committee for further approval.

18. Good practice in path management should reduce our financial liability arising from personal injury claims against the COL.

19. Being registered as Open Space under the CRow act 2000 has the potential to reduce our financial liability for personal injury claims.

Charity Implications

20. Epping Forest is a registered charity (number 232990). Charity Law obliges Members to ensure that the decisions they take in relation to the Charity must be taken in the best interests of the Charity.

Conclusion

21. A PDN has been prepared on path management. This identifies the property management context and other significant management considerations that should be considered.

22. A management strategy is presented along with an outline management programme which recognises that the next ten years will be a development period where we transition towards a planned management regime.

23. The first phase proposals would be achieved through existing Local Risk resources and are likely to reduce the COL's long-term financial liabilities arising from public liability claims.

24. Longer-term it is anticipated additional resources would be required and quantifying this need will be part of the first phase of works with a review and report to your committee scheduled for 2025.

Appendices

- Appendix 1 – Path Management: Policy Development note (2019)

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Path Management

Planning and Development Note

<i>Date</i>	<i>02/10/2020</i>
<i>Version</i>	<i>1.8</i>
<i>Review Date</i>	
<i>Author</i>	<i>Geoff Sinclair</i>

Path Management

PLANNING AND DEVELOPMENT NOTE

INTRODUCTION

Forest Operations Planning and Development Notes (PDN) aim to audit and collate the City of London (CoL)'s organisational and health and safety risk management issues for key activities, alongside other management considerations, to give an overview of current practice and outline longer term plans. The information gathered in each report will be used by CoL to prioritise work and spending, in order to ensure firstly that the CoL's legal obligations are met, and secondly that remaining resources are used in an efficient manner.

Each PDN will aim to follow the same structure, outlined below:

- Background – a brief description of the activity being covered;
- Existing Management Program – A summary of the nature and scale of the activity covered;
- Risk Management Issues – a list of identified operational and health and safety risk management issues for the site;
- Management Considerations – a list of identified management considerations for the activity;
- Management Strategy – a summary of the key operational objectives for the activity;
- Outline Management Program – a summary of the key management actions identified with anticipated timelines for completion;
- External Operational Stakeholders – a list of external stakeholders who have an operational input to and who have been consulted as part of the compilation of the PDN;
- Appendices.

BACKGROUND

Epping Forest and the Buffer Lands stretch for over 19km (12 miles) from East London into south-west Essex. Much of the Epping Forest area (2,469 ha) is a mixture of ancient woodland, heaths, bogs, ponds and grassy plain, while the Buffer Lands is mainly agricultural grassland. Overall, the land is informal and predominantly semi-natural countryside with around a third designated as a Site of Special Scientific (SSSI) and/or Special Area of Conservation (SAC).

The 1878 Epping Forest Act charges the Conservators of Epping Forest with the responsibility of preserving Epping Forest as an open space for the recreation and enjoyment of the public forever¹. As lifestyles have changed over the decades so has the nature of the public's recreational choices. For many years the Forest was the favourite day out destination for people from the east end of London. Charabancs and coaches would bring thousands to visit the 'retreats' and various entertainments held in the Forest. Today, many people value the Forest more as a place to enjoy a semi-wilderness through walking, running, cycling and horse-riding.

People are permitted to access the Forest and Buffer lands on foot, cycle or horseback only, with the following conditions applying:

Pedestrians: Visitors on foot have the right to access all areas of Epping Forest at any time of the day. Buffer Land access is permitted along Public Rights of Way (PROW) and on Permissive Open Access sites (Table 1) and permissive routes.

Cycling: Cycling is permitted throughout the Forest with the exception of the Scheduled Ancient Monuments of Loughton Camp, Ambresbury Banks, Pole Hill, along Loughton Brook RIGS site, around Connaught Water and on the Easy Access trails. Wanstead Park has a defined cycle route with no cycling permitted elsewhere in the park and cycling is only allowed on the Buffer Lands along Public and permissive bridleways.

Horse riding: Horse riding is permitted throughout the Forest, with the exception of out-of-bounds areas marked on the horse-riding booklet/guide (including the SAC heathlands) on payment of an annual licence. In the winter months access is limited to the surfaced ride network only. On the Buffer Land riding is on designated public and permissive bridleways only.

Table 1: Permissive Open Access sites, Epping Forest Buffer Lands

SITE NAME	LOCATION	AREA (ha)
Warlies Park	Upshire	116
Copped Hall Park and Raveners	Upshire	97.1
Swaines Green	Epping	5.4
Coopersale	Epping	13.5
Birch Hall Fields	Theydon Bois	6.1
North Farm	Loughton	23.1
Woodredon Estate	Upshire	30.6
Monkhams	Aimes Green	16.9

¹ Queen Victoria dedicated Epping Forest in 1878

The Conservators' access policy is currently to encourage and facilitate the use of the Forest and Buffer Lands in such ways that do not cause damage, compromise the natural aspect, harm wildlife or interfere with other users².

Section 7(3.) of the Epping Forest Act 1878 places a statutory duty on the City of London Corporation, acting as the Conservators of Epping Forest, to '*at all times as far as possible preserve the natural aspect of the Forest...*'. The 'natural aspect' is not defined within the Epping Forest Act, however, in the context of Epping Forest, Thomson (2017)³ concludes the natural aspect represents a particular appreciation of the wildness of nature, while at the same time embracing the rural traditional landscape management through 'peasant' pursuits such as grazing, pollarding, which in turn is framed by sparse rural features such as earthworks, ruins, bridges and mills.

The current path network has developed over time, with individual routes arising from a range of initial objectives, such as improving the connectivity of the PROW on the Buffer Lands or providing all weather routes in the Forest. Management of the different path types has in practice over the years been combined under the following principles:

- *Natural paths*: Paths with minimal intervention to maintain their accessibility. In most cases, this path type best meets biodiversity and heritage obligations;
- *All-weather routes*: Surfaced paths responding to difficult ground conditions are appropriate on routes across the Forest and Buffer Lands where there is an approved strategic management or public access need. The maintenance obligations associated with the all-weather route network influences the Charitable trust's ability to develop further all-weather provision;
- *'All-ability' paths*: Installed at locations where there is a significant need for higher accessibility standard paths. The creation and maintenance costs of these significantly restricts the provision of these highly accessible all-weather routes;

The Access Policy for Epping Forest is being revised and due for completion in 2020/21. This Path Management PDN anticipates the Sustainable Visitor Strategy and sets out to first describe the nature and extent of the path network across Epping Forest and the Buffer Lands and second, identify management standards and impacting considerations for the different paths types. Finally a management strategy to ensure stated standards will be met is outlined.

² Epping Forest 2010: The Management Plan for Epping Forest 2004 to 2010. (Page 77)

³ Paul Thomson (2017) Unpublished note on 'Defining the 'Natural Aspect''

EXISTING MANAGEMENT CONTEXT

Path Network

There are 41 km of public rights of way (PRoW) in Epping Forest and the Buffer Lands. In addition, there are around 81 km of paths designated by the City of London as managed routes suitable for horse riding, cycling and walking, with some routes seasonally unavailable for riding and cycling. Across the Forest there is an unquantified network of unofficial paths. A review of the path network in 2019 (Table 2) identified 198 km of paths where the City of London has a management responsibility.

Table 2: Forest and Buffer Land path types and managed length

Path Type	Description	Managed Length (km)
Official All-weather	Paths identified on the Official Epping Forest map as all-weather paths for use by horse riders, cyclists and pedestrians.	36
Official Natural	Paths identified on the Official Epping Forest map as natural paths for use by horse riders, cyclists and pedestrians, usually seasonally closed to horse riders and cyclists.	45
Public Right of Way (PRoW)	Paths identified on the definitive map that the public have a legally protected right to pass and re-pass. Depending on the specific path's status people will be able to access on foot, cycle or horseback.	41
Easy Access Trail	Four trails promoted as 'Easy Access' with a level, firm, non-slip surface and regular benches and passing places for wheelchairs. Located High Beach, Connaught Water, Knighton Wood and Jubilee Pond. Cycling and horse riding are not allowed.	3.1
Informal Path	These paths have been identified using the Strava App which collects geolocation data from users who are often cyclists and runners. This shows where recreation is occurring. Further routes may be added to the Informal Path network if local information warrants the path's inclusion.	38
Waymarked Trail	Nine waymarked circular paths established across Epping Forest and the Buffer Lands. Each trail follows official, informal and desire paths as well as Public Rights of Way (PRoW) with some on PRoW on land not managed by the City of London.	38.5
Buffer Land Permissive bridlepath	Permissive bridlepaths agreed by the Conservators to complement and extend access across the Buffer Lands.	5.6
Buffer Land Permissive path	Permissive footpaths agreed by the Conservators to complement and extend footpath access across the Buffer Lands.	2
Third Party paths	Paths on COL owned land but where the management responsibility is with a third party through a management agreement or License.	TBC
Desire Path	Visitor defined routes where the use as indicated on the user defined Strava App indicates a lower level of use. No active management.	0

A comprehensive review of the path network in 2019 expanded the remit of previous path surveys to include the Public Rights of Way paths, Waymarked and Easy Access trails, as well as capturing some other *defacto* official natural and all-weather paths. Sketch maps of the path network by compartment are available separately to this report with an example given in Appendix One.

PATH MANAGEMENT PROGRAMME

Existing management programme

The annual management of the paths costs *circa*. £105,000 with staff costs representing 88% of this amount. Management is currently based around reactive maintenance, responding to encroaching vegetation and path surface and drainage concerns. Annually the local riding forum feeds in access issues and these, along with staff identified tasks, form the basis of the current annual path works program.

Planned cutting of path verges is undertaken each year with the work fitted in around other tasks and the extent completed varying with the time available. The 2019 audit of the Official path network identified 61.3km of paths where the edge vegetation was restricting permissible access upon the path either by constricting the path width or the accessible height of the path (just over 30% of the 198km of paths in Epping Forest). In addition 25.5 km of rides were identified that had drainage or path surfacing problems. It is evident that the current maintenance regime is not identifying activity needs before problems arise and the accessibility of some paths is declining.

Implications of the 2019 path audit

Notable outcomes of the 2019 path audit are that the maintainable path network is significantly greater than previously considered and that its condition is showing the effect of under maintenance. This highlights a need to reassess the largely reactive approach to path maintenance currently adopted. In addition to any aspirational objectives to be identified in the Access Policy, a path management programme at Epping Forest requires the following four objectives to be achieved as a minimum:

- Safe: The path network is maintained in a fit condition appropriate for the type of use it will get;
- Accessible: It is accessible for users and adopts the principle of Least Restrictive Access;
- Appropriate: It pays close regard to the importance of maintaining the 'Natural Aspect' of the Forest, including features of biodiversity, historic, traditional or archaeological interest; and,
- Recorded: Management and monitoring work is recorded in an accessible format for future reference.

A Safe Path Network

The legal obligations for managing visitor safety are clear with regards to users of the Public Right of Way network. The Local Authority is usually responsible for ensuring the path surface, including any bridges, is in a safe condition and fit for the type of traffic which is ordinarily expected to use it. Any stile, gate or other similar structure across a footpath belongs to the landowner and must be maintained by the landowner in a safe condition, and to the standard of repair required to prevent unreasonable interference with the rights of persons using the path.

Most routes in the Forest (and some on the Buffer Lands) are not Public Rights of Way. As a Public Open Space under the Open Spaces Act 1906, the City of London is tasked to ‘maintain (Epping Forest) and keep the open space in a good and decent state,⁴’.

As a guide to what “*a good and decent state*” means the Countryside and Rights of Way Act 2000 (CRoW Act 2000) gives an indication of potentially relevant considerations when managing Epping Forest’s permissive access land and paths. Based on the CRoW Act 2000, two guiding principles for managing public safety on the path network can be confirmed:

- Access infrastructures need to be installed and maintained in a fit condition appropriate for the type of use it will get, however;
- People accessing the Forest ought not to place an undue burden (whether financial or otherwise) on the COL.

Note: These principles provide a baseline from which to judge potential path management responsibilities; however, there may be a need for enhanced care with some paths, which individual path management plans should identify.

An Accessible Path Network

Overall, Epping Forest is a semi-wildland to wildland environment as outlined in the BT Countryside for All standard (Appendix Two and see ‘An Appropriate Path Network’ below). In approaching the accessibility of Epping Forest, the principle of the ‘Least Restrictive Access (LRA)’ will be adopted to undertake the accessibility review⁵. The LRA process is helpful where standards of path provision need to vary for a range of reasons and provides a basis for ensuring that individual path standards are as good as they can be for as wide a range of people as possible and catering for as great a range of different disability types as feasible.

Clay soils prone to waterlogging and poaching cover a large extent of the Forest, with some main access routes seasonally difficult or impossible to access by most users, including those on foot. A network of all-weather paths is maintained to facilitate year-round foot, cycle and horseback access to the Forest. There are also several promoted routes in the Forest designed to encourage and widen public access. These routes are intended to be managed to a higher accessibility standard than the LRA and all-weather paths options.

There are important gaps in the all-weather path network with, for example, key attractions such as The View Visitor Centre having no all-weather path access, leading to poor accessibility in the winter months for all users travelling across Forest land and poor access for some disabled users year round. The southern half of the Forest typically makes up the largest proportion of the public open space available to residents in these areas. Poor year-round Forest accessibility in some of these areas has the potential to adversely impact a large number of users with few alternative green space options.

⁴ Open Spaces Act 1906 (Para 10.b)

⁵ Fieldfare Trust (Undated) *Least Restrictive Access Guidelines* (http://www.eau.ee/~bell/Recreation_course%202008-9/Countryside%20for%20All/Least%20Restrictive%20Access%20Guidelines.pdf) – Fieldfare Trust defunct as of 2018 and these guidelines now taken up by Pathsforall.org.uk

An Appropriate Path Network

The Conservators' duty to maintain the 'natural aspect' (and the other parts of Section 7(3) which include the unconditional protection of the turf and herbage) and the designation of a large part of the Forest as a SSSI/SAC or Scheduled Ancient Monument (SAM) introduces several design tests for any constructed path. By its nature, constructing a new path introduces a non-natural feature and the process of construction and the materials used will lead to environmental changes. These changes can be beneficial where, for example, historically people have created a wide and badly poached area across muddy clay soils, and the construction of an all-weather surface channels visitors onto a narrowly defined path, allowing the ground either side of the path to regenerate undisturbed. Negative impacts may be outweighed by wider benefits achieved such as improved access to areas of public interest or improved accessibility for disabled users. In planning the construction of new or the physical upgrading of existing paths, a simple environmental appraisal (Appendix Three) of the proposal will be prepared, appropriate for the scale of the project and used to aid decision making.

The unplanned development of some informal paths can also have a harmful impact, requiring a management response, especially in areas with a statutory designation such as a SAC/SSSI/SAM. The SAC Site Improvement Plan (SIP v1.1 2016, Natural England) formalises a management response framework and this current Planning & Development Note (PDN) will form an important contribution to Action 3 of the SIP (2016) which states: "identify key areas that are subject to recreational impacts". Where such potential concerns are identified, the simple environmental appraisal process outlined in Appendix Three will be followed in assessing the informal path and identifying management needs and any environmental constraints.

Recording Management and Monitoring Actions

Path condition monitoring has been a reactive process based on the feedback from Keeper staff regularly accessing the Forest and reporting problems as they are observed. Such a reactive process tends to identify problems at a late stage when resolving them can be more costly and the impact on visitors can be more prolonged. To address these concerns and to meet the need to respond to an increasingly challenging public liability claims environment from users, there is a need for a formal planned monitoring regime. An important benefit of such a process will be improved management information on the scope, scale and cost of ongoing maintenance programmes. Records from this system will need to be maintained and easily accessible to COL Management for at least ten years.

Revised Management Process

Reactive management processes are appropriate for *ad hoc* small scale maintenance operations; however, to achieve the above four objectives on a path network with a much-increased length of maintainable paths requires a planned management process. It is proposed through this PDN that a revised planned path management process be adopted at Epping Forest. The process would comprise the following elements:

- Path condition monitoring: The condition of paths will be subject to periodic monitoring. The frequency of monitoring will vary with the path type and reflect the level of path use (Table 3), with the features recorded as part of the survey given in Appendix Four. Safety and drainage works required will be identified through this process;
- Vegetation management: The management of the adjacent vegetation will be undertaken as part of an annual planned maintenance programme. In the first instance this will be based on the 2019 Path Audit, however, it will require a further period of development to better

align the maintenance works to the speed of vegetation regrowth and the need for 'tidiness', based on path usage. Reference will also need to be made of any environmental constraints and reference sources such as the Forest's Scarce Species Register.

- Capital works programme: An annual work programme based on the outcome of the path condition monitoring. Works will principally be drainage and safety related works.

Standard specifications in Appendix Five give the design standard for the main path types and the maintenance work normally required to achieve these standards. With the shift from reactive to planned management processes, not all paths can be assumed to meet the standard specification and the proposed management programme over a ten year period should be seen as a transition process, with a greater need for capital works in the first 10 years to bring paths up to the required standards. At the end of this 10 year process the path network should be fully audited in the expectation that it will be broadly compliant; it should be possible at that point to quantify the annual ongoing maintenance programme for normal 'wear and tear' works.

Table 3: Proposed path condition monitoring frequencies

Path Type	Managed Length (km)	Monitoring Frequency (years)	Approximate annual survey (km)
Official All-weather	36	5	7.2
Official Natural	45	10	4.5
Public Right of Way (PRoW)	41	10	4.1
Easy Access Trail	3.1	1	3.1
Informal Path	38	Reactive management only	
Waymarked Trail	38.5	10	3.9
Buffer Land Permissive path	7.6	10	0.76
Third Party paths	TBC	10	???
Desire Path	0	No management	

PROPERTY MANAGEMENT CONTEXT

Tree Safety

- All Official paths, unsurfaced or surfaced, and waymarked trails have been categorised at least as Green Zones under the Tree Safety Policy. Green zones have a five-yearly tree safety assessment undertaken by trained Keeper staff. This is a separate survey to the path condition monitoring surveys outlined in Table 2 above.
 - *It is proposed that all Public Rights of Way across the Forest and Buffer Lands and Informal Paths in Wanstead Park are managed as Green zones. This will add 48.2 km to the total survey programme.*
- Easy Access paths are categorised as Red zones under the Tree Safety policy and independent arborists survey these for tree safety issues every year.

- Informal and Desire paths are currently not assessed for tree safety and under the current policy, tree safety issues raised would tend not to be responded to and the trees allowed to grow and develop naturally.
 - *It is proposed that for Informal Paths (excluding Wanstead Park), the tree safety response would be that a site visit will be undertaken in response to any reported problems by users to assess the situation.'*

Statutory Designations

A number of statutory designations apply to parts of Epping Forest and the Buffer Lands that also impact on the nature of the path provision in the Forest:

- Site of Special Scientific Interest (SSSI) and/or Special Area of Conservation (SAC). Under the legislation and regulations for these designations, and their associated assessment and consent procedures, the City of London (as competent authority and land manager) and Natural England (as statutory adviser and consenting body) need to assess the appropriateness (see above on *Appropriate Path Network*) of any path creation and management practice in relation to the conservation objectives and protected features for the sites
- Registered Parks and Garden (RPG)/ Scheduled Ancient Monuments (SAM): Wanstead Park and Copped Hall are Grade II* RPGs and Ambresbury Bank and Loughton Camp are SAMs. In both cases, Historic England and the Local Planning Authorities may need to authorize any path management proposals.

Infrastructure

- Access infrastructure: Policy and practice concerning individual access infrastructure types, eg bridges, boardwalks and culverts, is covered under the Forest Furniture Policy Development Note, which will be completed in 2021.
- Path surfacing: The type of path surfacing currently used is outlined in the Standard Specifications (Appendix 5). In summary, all-weather paths are based on using a MOT Type 1/Coxwell Self binding gravel base, or similar, with no wearing course. A wearing course of 5mm to dust granite (or similar) will be used on paths requiring a higher accessibility standard and smoother finish, eg Easy Access trails. On occasions, and by exception, where a coarse sub-base comes to the surface, all weather paths may have a wearing course added in selected locations.
 - *It is proposed that the path surface of each path section be defined as part of the next phase of the audit process.*
- Drainage: With predominantly clay soils, the presence of drainage and the condition of the drains are defining criteria for the condition of path surfaces. Drainage concerns have been identified in the 2019 audit for 25.5km of the official path network. The location of drains and associated infrastructure is only known at an indicative level, with an absence of any detailed engineering maps and descriptions, most of these having been installed many years ago.
 - *It is proposed that the path drainage network be mapped and recorded, including its condition, in the next phase of the audit process. The drainage maps will also give attention to the requirements of the water levels/soil moisture of adjacent habitats and the need to protect habitats from any contaminants flowing off the path surface as well as explore opportunities to divert water on to habitats that would benefit from rewetting.*
- Public liability: The relative responsibilities regarding public liability for public rights of way, formal and informal paths needs to be more clearly articulated in the future Paths Management Strategy

- *It is proposed that a review of the landowner duty of care responsibilities be undertaken.*

Signage

- Epping Forest waymarking: The COL has installed nine waymarked trails, which have been marked using a square sawn timber bollard⁶ with a route directional arrow. The bollards cost around £75 each for materials and installation, limiting the number that can be installed for cost reasons. Where routes overlap, two posts are required.
 - *It is proposed that we transition away from the use of individual timber bollards towards waymarker discs. This will allow for more frequent waymarking, improving the clarity of routes and will also allow much cheaper replacement.*
- Third party waymarking: Across the Forest there are a wide number of waymarked routes installed by third parties. These include:
 - Regional waymarked trails such as the London Loop;
 - Local waymarked trails installed by communities and local authorities and,
 - Public Rights of Way network waymarkers installed by the local authority.
- Finger post signage: In 2017 as part of helping visitors orientate themselves and navigate the Forest, a programme of finger post installation was initiated.
 - Funded under the Branching out Project in 2017 signs were installed in and around the visitor access hubs in the Forest at Chingford, High Beach and Wanstead Flats;
 - Funded through a City Bridge Trust (CBT) grant, the Highams Park Snedders (a local community group) installed 13 signs in and around the Highams Park area in 2019.
 - It is proposed that a phased programme of finger post sign installation be continued, based on developing local funding mechanisms such as the project by the Highams Park Snedders.

Sightlines

- Forest paths and car parks: Sight lines on main Forest paths (typically the Official all-weather and natural paths) and car parks that exit onto the public highway are maintained by the COL. 75 'areas' of the Forest with multiple sightlines are cut once a year in June/July with repeat cuts undertaken on a reactive basis.

Livestock

- From May to November, cattle are grazed on the Forest and Buffer Lands and may often be found on or alongside paths. Working practices concerning cattle and public access are in accordance with guidance set out in the Health Safety Executive's Agriculture Information Sheet No 17EW(rev1), with additional measures that take account of the Forest as an open space.

⁶ Waymarker type J2: Square Sawn posts as described in the Forest Furniture PDN

MANAGEMENT CONSIDERATIONS

Access

- The predominant clay soils across the Forest and Buffer lands are reflected in the condition of the official unsurfaced paths in many locations. During the 5-6 months in the winter important routes are very poor to impassable for most users and there are expanding zones of damaged ground as users seek to avoid wet areas through creating new routes. Seasonal inaccessibility is a particular concern in central and southern areas where the Forest can represent the only nearby open space for many people.
- The all-weather path network has developed in a piecemeal way with a large early emphasis on the provision of routes for horseriders and less recognition of the needs of other users.
- The forthcoming Sustainable Visitor Strategy will provide an assessment on the future shape of the access needs in the Forest reflecting the needs of users and the environmental constraints to be considered.

Property

- Third party routes: Third party agencies under specific agreements have upgraded paths across the Forest. Maintenance of these paths by the third party has however been mixed over the years, with complaints on their condition regularly directed to the City of London. Officers of the responsible organisations are frequently unaware of their liabilities when approached. The City of London's obligation under the Occupiers Liability Act 1957 indicates that management of these routes needs more active engagement with the third parties concerned, to ensure that these paths are appropriately maintained.
 - *It is proposed that a review of third-party routes is undertaken and working arrangements reconfirmed with the responsible organisations*

Ecological

- Paths and their verges can serve as wildlife corridors, facilitating the movement of species. Historically, they were a refuge for heathland and open ground species such as heather, cow-wheat and members of the Hawkweed (*Hieracium*) family and also woodland edge flora like violets and wood sorrel, which suffered from woodland encroachment following the decline of grazing. In developing path management plans, the opportunities to promote wildlife conservation benefits will be identified and developed.
- Constructed paths are an artificial intervention with both the act of construction and the materials used changing the local conditions. Equally, well used informal paths can bring about considerable negative impacts on a local scale, with the path 'spreading' in wet conditions as people look to avoid deep mud. Changes to natural drainage and soil pH are two of the more subtle but longer lasting impacts. The large extent of the path network is such that an understanding of the ecological impacts of the path system is presently largely anecdotal.
 - *To better plan the path development process in the longer term, an important need is to undertake an assessment of the ecological pressures to be faced with changing visitor needs and ecological opportunities that may arise.*

Landscape

- Green lanes/heritage routes: The Forest's path network is set within a historic landscape long inhabited, with man-made structures such as the Hillfort, Ambresbury Banks, dated to around 500BC. A number of paths, eg Organ and Mays Lanes, form part of what once were a network of long used routes such as drove roads.
 - *A separate Policy Development Note will be prepared concerning the management of these historic routes in 2021/22.*

Community

- The 12-mile elongated and largely linear nature of the Forest means that it passes through many communities; in many instances, it is the main public open space for the communities concerned. Access development to the Forest from these local communities has been largely organic and unplanned. Climate Change concerns and encouraging people to use their car less are raising the profile of the need to consider enhanced local access provision, to provide attractive access points for communities, closer to where they live and without the need to drive. This may also help to reduce pressure on increasingly busy car parks within the Forest.
 - *It is proposed that a new Local Forest Access Point be defined by way of a trial of concept and the outcome on car-based access assessed. This may include installation of small-scale Forest furniture (finger posts and location maps) and path management, with the aim of making these local access points more welcoming to local residents approaching on foot.*

Financial cost

- The revised management process represents a change in how path management activity is delivered at Epping Forest. A legacy of the former reactive process is that additional works will be required to ensure paths meet the relevant specification. It can also be anticipated that additional ongoing maintenance will be required to continue to ensure paths meet the design specification. An increasingly difficult financial environment will pose a constraining influence on achieving these changes.
- To identify where resources are best allocated in the first instance an access setting assessment was undertaken for each Forest compartment based on the BT Countryside for All standard (Appendix Two). Using the standard each Forest compartment was given one of four access categories: Red+, Red, Amber and Green where Red+ is a high access area and Green is a low access area remote from visitor facilities and less accessible for visitors. Table 4 identifies the core activities in these access zones
 - *It is proposed that initially path management is concentrated on the high access categories of Red+ and Red to develop a better understanding of the full impact of the changes in a phased way while ensuring the high-risk access areas are managed.*
 - *A review of the access zones should be undertaken for the end of the ten-year period eg it may be more appropriate to have a breakdown at sub-compartment level.*

Table 4: Path management activity in each access zone (km/yr)

Path Management Activity	Access Zone (km/year)			
	Red+	Red	Amber	Green
Path Management: Cut a 1.5m wide verge both sides of the path along mapped routes.	36	35	12	10
Path Management: Cut a 3m wide path along mapped routes.	22	15	6	10
Woody Vegetation Management: Woody vegetation and bramble cut to ensure the path meets the Forest standard	12	12	6	4

MANAGEMENT STRATEGY

Overall objectives for managing paths in Epping Forest:

1. To have an annual management programme that ensures we meet COL's requirements under the Highways Act (1980) and Epping Forest path management standard specifications.
2. To ensure the path network accessibility is appropriate for a semi-wildland to wildland environment and Special Area for Conservation
3. To integrate path management into wider operational habitat and landscape management; and,
4. To provide a path network in a safe condition and fit for the type of traffic which is ordinarily expected to use it.

OUTLINE MANAGEMENT PROGRAMME

Objective	Action	Timing (Years)
1/4	<i>Risk Monitoring:</i> Continue ongoing regular monitoring of tree safety along the path network as per Tree Safety Policy.	Ongoing
1/4	<i>Risk Monitoring:</i> Devise a risk monitoring system for path condition and undertake regular condition monitoring of the path network.	Ongoing
1	<i>Review: Undertake a review of the landowner duty of care responsibilities</i>	2026
2/3	<i>Review:</i> Undertake an ecological assessment of the path network and the opportunities and constraints they present. Integrate with Site Improvement Plan actions	2025
1/2/4	<i>Review:</i> Undertake a review of the path management responsibilities of third parties and their effectiveness, to confirm management responsibilities going forward.	2022
1/2/3/4	<i>Review:</i> Green Lanes Policy Development Note prepared.	2021
1/4	<i>Review:</i> Undertake a review of the access zones to assess their effectiveness and opportunities for refinement eg to sub-compartment level	2030
2/4	<i>Improvement Programme:</i> Prepare detailed project plans arising from the Sustainable Visitor Strategy for improvement projects to seek funding and Statutory permissions.	2022
2/3	<i>Improvement Programme:</i> Identify and establish a pilot modal shift Local Forest Access Project and monitor the impact on	2022

	users and habitats. Proposed initial location is Goldings Hill. The benefits of widening this approach will be considered in the Sustainable Visitor Strategy	
1/2/3/4	<i>Planning:</i> Individual path management plans prepared for all monitored paths, including vegetation maintenance regime, path surface type, drainage details and habitat management opportunities.	2022
1/3/4	<i>Path Maintenance:</i> Arising from path condition monitoring (see above), undertake annual path maintenance works to ensure the condition of the path network meets the access standard for each path category.	Ongoing
1/3/4	<i>Path Maintenance:</i> Manage path vegetation according to Individual Path Management Plans, to ensure vegetation meets the access standard for the path type.	Ongoing
2/4	<i>Path Maintenance:</i> Initial drainage works improvement program prepared based on the 2019 Audit and work program undertaken.	2021
2/4	<i>Signage:</i> Phased replacement of the waymarker bollards with discs.	Ongoing
2/4	<i>Signage:</i> Cut back annually all ground and arboreal vegetation that would impede orientation signs. Potential volunteer task.	Ongoing
1/4	<i>Finance:</i> Focus path management on the high access category compartments of Red+ and Red to develop a better understanding of the full impact of changed costs. Review after five years	Ongoing/Review 2025

APPENDICES

Appendix One: Example of a compartment sketch map of paths

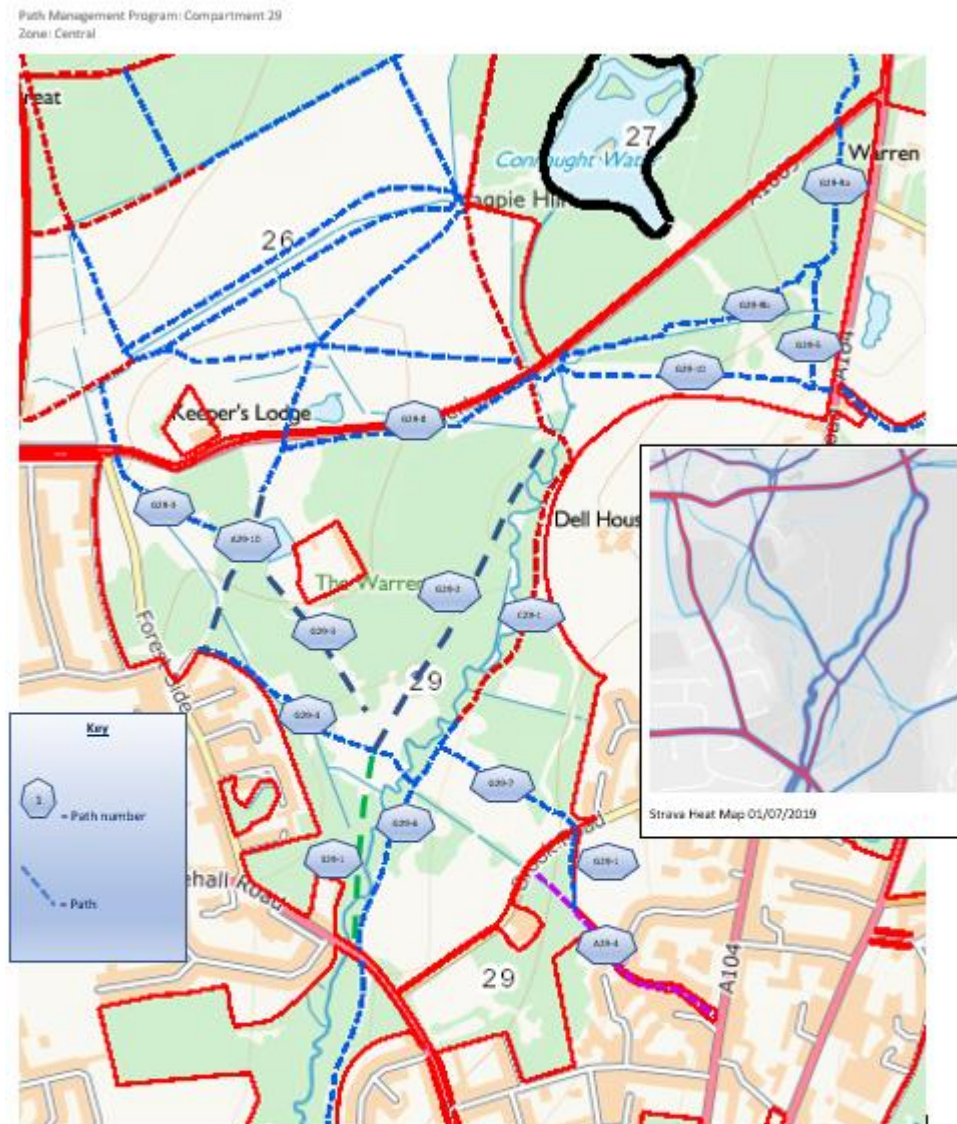
Appendix Two: BT Countryside for All Accessibility Standards

Appendix Three: Environmental Checklist

Appendix Four: Path Audit Form

Appendix Five: Standard Specifications for Path Management

Appendix One: Example of a compartment sketch map of paths



Geoff Sinclair (1/07/2019)

Appendix Two: BT Countryside for All Accessibility Standards

	Path Surfaces (see note 1)	Path Widths (see note 2)	Width restrictions (see note 3)	Barriers (see note 4)	Maximum distances between passing places (see note 5)	Maximum distances between rest areas (see note 6)	Maximum steepness of ramps (see note 7)	Maximum height rise between landings on ramps steeper than 1:20 (see note 8)	Maximum slope across a path (see note 9)	Maximum step levels (see note 10)	Surface breaks (grills, board-walks) (see note 11)	Clear walking tunnels (see note 12)
Urban and formal Landscapes For example countryside areas with a lot of man-made features	Hard, firm and smooth surface with very few loose stones and none bigger than 5mm	1200 millimetres (millennium Miles)	At least 815mm for no more than 300mm along the path 1,000mm for no more than 1,600mm along the path	There should be no steps, stiles, and no fences, hedges or walls to restrict access	50 metres (m)	100m	1 in 12 (for example for every 12 metres you travel you can rise one metre)	750mm (for example landings should be every 9m along ramps of 1 in 12)	1 in 50	5mm	The largest break in the surface of the path should be no more than 12mm measured along the line of the path	1,200mm wide x 2,100mm high
Urban fringe and managed landscapes For example, countryside areas near towns or managed recreation sites	Hard and firm surface with very few loose stones and none bigger than 10mm	1,200mm	At least 815mm for no more than 300mm along the path 1,000mm for no more than 1600mm along the path		100m	200m	1 in 12	830mm	1 in 45	10mm		1,200mm wide x 2,100mm high
Rural and working landscapes For example, farmland and woodland with public rights of way	Hard and firm with some loose stones and chippings not covering the whole surface. The stones should be no bigger than 10mm	1,000mm	At least 815mm for no more than 300mm along the path 1,000mm for no more than 1,600mm along the path		150m	300m	1 in 10	950mm	1 in 35	15mm		1,000mm wide x 2,100mm high
Open Country, semi- wild and wild For example, mountains, moorlands and remote countryside	People expect to make their own way, not to have this environment changed to provide access. If paths and trails are provided in this setting, they should meet the standard for the rural and working landscapes setting (as shown in the row above).											

Appendix Three: Environmental Checklist

ENVIRONMENTAL CHECKLIST

Compartment No		Site Name	
Date		Contact	

Description of the operation

CHECKLIST

Does the COL own the land concerned?

- *If no or unsure check with land Agent*

Y/N

Is the COL responsible for undertaking the work?

- *Operational agreements cover some parts of the Forest where works are the responsibility of others.*
- *Check with land agent if in any doubt,*

--

Is the operation on Buffer Land?

- *Any tree felling may need a Felling Licence from the Forestry Commission.*

--

Is the operation on Forest Land?

- *Operations not covered by the Management Plan and/or approved annual works programme may need consent from Natural England*

--

Do any statutory designations apply to the area of the operation?

- *TPO: no tree with a TPO should be worked without consent for the Local Authority*
- *Conservation area: No tree should be worked without consent for the Local Authority*
- *SSSI/SAC: Consent may be required from Natural England or a Habitat Regulations Assessment may be required dependent on scale of any proposal*
- *SAM/RPG: Consent may be required from Historic England and/or Local Authority.*

--

Does the operation involve ditches, watercourses or ponds?

- *Land Drainage consent may be required for some work, eg EFDC have separate bylaw re drainage*
- *EA consent may be required for work on watercourses*

--

Does the operation involve work on a dam?

- *Liaise with the Department of Built Environment regarding work on dams.*

--

Do the operations impact directly on protected species eg Bats, nesting birds and Great Crested Newts or veteran trees?

- *Liaise with the Conservation Team over the proposals*

--

Does the operation require planning permission?

☐

- *Creating new entrances, upgrading paths and installing signage may require planning permission*

Have the heritage and scarce species maps been checked for sensitive features

☐

- *Liaise with the Conservation Team over the proposals if any records*

Is the work in an area covered by grant funding or other external obligations?

☐

- *Liaise with other Epping Forest Officers on external obligations*

ISSUES IDENTIFIED

--

MITIGATION MEASURES

--

Appendix Four: Path Audit Form

General Details

Location		Date	
Path No		Surveyor	
Path Name		Length (m)	

Path Type (Can tick more than one)

PRoW: Footpath		Unsurfaced shared use path	
PRoW: Byway		Easy access trail	
PRoW: Bridleway		Promoted route	
Cycle path		Informal path	
Surfaced shared use path			

Drainage Condition (All paths)

Facing edge	North	South	East	West
Ditch Location				
Ditch Condition				
Running freely				
Restricted flow but running within ditch				
Restricted flow with overflowing onto path				
Not functioning, blocked.				

Surfaced Path Condition (Can tick more than one)

(Relatively) Even surface		Sub-base exposed: Occasional	
Rill/gulley erosion		Sub-base exposed: Frequent	
Frequent potholes < 40mm deep		Restricted verge drainage	
Frequent potholes >40mm deep			

Edge Vegetation (check Scarce Species Register on *CityMaps*)

Zone	Grass/ Bramble	Scrub	Woodland	Encroaching	
				Aerial veg	Ground veg
One					
Two					
Three					

Structures

Structure	No	Condition	
Culvert		Running freely	
		Restricted flow: running	
		Not functioning: collapsed	
		Not functioning: blocked	
Vehicle Bridge		Functioning: No work	
		Functioning: minor non-structural repairs	
		Functioning: Significant, including structural repairs	
		Not functioning	
		Immediate closure	
Pedestrian Bridge		Functioning: No work	
		Functioning: minor non-structural repairs	
		Functioning: Significant, including structural repairs	
		Not functioning	
		Immediate closure	
Seat/Bench		Functioning: No work	
		Functioning: minor non-structural repairs	
		Functioning: Significant, including structural repairs	
		Not functioning	

Comments

Map Key

Ditch (Blocked)	----- +++++	Culvert (Blocked)	O
Vehicle Bridge	▲	Pedestrian Bridge	■
Seat	S	Encroaching Vegetation	◀

Appendix Five: Standard Specifications for Path Management

- **Easy Access Trail**
- **Waymarked Trail**
- **Official Natural Surface Paths**
- **Official All-weather surface paths**

	<p><u>Forest Standard: Easy Access Trails</u></p> <p>Background</p> <p>Four paths totaling 2.9 km are promoted as ‘Easy Access trails’. Each trail has a level, firm, non-slip surface with benches and passing places for wheelchairs at regular intervals. Interpretation is available at the beginning of the trail and is large print and accessible and readable from a seated position.</p>
	<p>The trail locations and lengths are as follows:</p> <ul style="list-style-type: none"> ○ High Beach (0.8km) ○ Connaught Water and the Red Path (1km) ○ Knighton wood (0.65km) ○ Jubilee Pond (0.5km) <p>Cycling and horse-riding are not permitted on easy access trails with information signage erected at key points to advise on this.</p> <p>Path surfacing has historically been undertaken using a range of surface material however repairs and any new surfacing is being undertaken using Coxwell Self binding gravel and 5mm path dressing. Timber edging has been used on some paths and will no longer be used due to it becoming an increasing trip hazard.</p> <p>There may be some overlap of the Official surfaced paths with Waymarked trails.</p>

Access standard

Path surface: Minimum surfaced path width 1.2m. Variable construction historically with repairs and new surfaced paths to be installed as follows:

Base layer: Coxwell Self binding gravel

Wearing coarse: Coxwell 5mm path dressing

Drainage: Ditching essential on slopes and on wet sections and as required elsewhere

Bridges/Culverts: Bridges and culverts are regularly used on these routes to manage water movement.

Access Box: Minimum 3m wide by 3m high.

Waymarking: Routes are not waymarked

Standards of Maintenance

Verge management:

- 1m verge cut twice a year or to ensure grass and herbaceous growth is a maximum of 22.5cm in height
- Woody edge vegetation cut every three years or to ensure a minimum of a 3 x 3m access box
- Where cut material is to be chipped the chips are to be dispersed on the forest floor ensuring the following practice is adhered to:
 - **Do not** spray chip over moss/lichen mats, deadwood piles or logs, rides or ride sides or to the bases of semi-mature and mature trees. Avoid grassy areas and areas with flowers.
 -

- **Do not** create large woodchip piles but focus on a shallow even spread of chips.
- **Do** focus on bramble and bracken areas for woodchip receptor sites.
- No timber or cordwood to be left where it could be hit by machinery undertaking routine maintenance of the bridleway.

Ditches: Existing ditches kept clear of vegetation and debris.

Path surface: The wearing coarse of paths to be maintained in a smooth compact condition with rare sections of exposed sub-base which are repaired within one month following identification.

Edging boards: Timber edging boards have been used at the High Beach and Knighton Wood's paths. These will be phased out as they come up for replacement.

Condition Monitoring

- All routes inspected once a year;
- Hazard inspection undertaken for imminent threat issues including trees and unauthorised structures;
- Vegetation encroachment assessed to ensure height and width requirements are met;
- Ditch condition: Identify and report on works to remedy any blockages or interruptions to the water flow;
- Path surface: Report problems including, exposed sub-base, loose material.
- Signage: Presence and condition of signage
- Edge boards: Condition
- Structures, including gates, culverts and bollards, inspection undertaken as required under their respective Forest Standards.

Recording

Path Condition and Maintenance reports to be completed for each maintenance and inspection visit and passed to the Head of Operations who will update the path management database.

Further Guidance

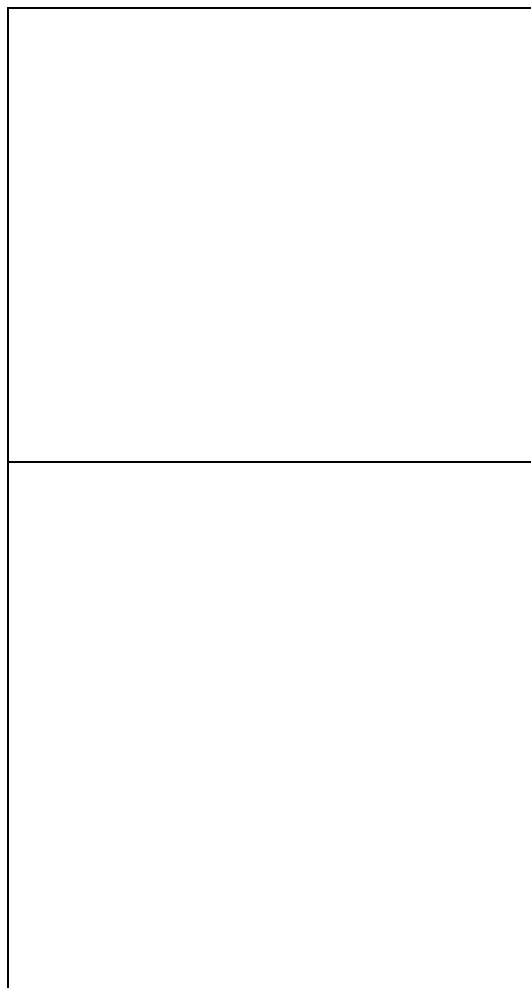
Path closure: Only light tasks or quick moving tasks should be undertaken, eg pole sawing overhanging vegetation or small-scale scrub cutting without closing the path. Where more substantial tasks are identified so that a path closure may be likely then provide a description of the work and its location to the Head of Operations.

Banksman: In all cases consider the desirability of having a banksman or someone on less intense work and who can keep an eye out for riders.

Bird nesting: During the nesting season do not work thick scrub areas and instead mark these on the map for work outside of the bird breeding season.

Uncommon species – flora and fauna: The following species should not be cut: Crab Apple, Wild Service, Butchers Broom Spindle, Buckthorn. Willow will need to be cut on a long-cycle coppice/pollarding rotation to ensure protection of egg-laying trees for Purple Emperor. Avoid cutting or adopt tree surgery rather than felling approaches with mature willows.

Large decaying wood timbers should be left intact on ride edges and carefully re-located (with approval) causing obstruction/hazard to users or maintenance



Forest Standard: Waymarked Trails

Background

Nine waymarked circular paths totaling 38.5km have been established across Epping Forest and the Buffer Lands. Each trail follows official and informal paths in Epping Forest as well as Public rights of way (PRoW). Some PRoW are on land not managed by the City of London.

Interpretation is available at the beginning of the trail and maps can be downloaded from the internet or obtained from EF visitor centres. Timber waymarker posts with arrows are located at regular intervals and main junctions along each path.

Path surfacing varies from surfaced to natural Forest soils with varied and occasionally steep topography.

The trail locations and lengths are as follows:

- The Chestnut Trail, Wanstead Park (5.2km))
- The Holly Trail, Chingford Plain (4km)
- The Willow Trail, Connaught Water (4km)
- The Hornbeam Trail, Leyton Flats (5.75km)
- The Lime Trail, Bush Wood (2.5km)
- The Beech Trail, High Beach (4km)
- The Rowan Trail, Knighton wood (2.5km)
- The Gifford Trail, Upshire, (2km)
- The Oak Trail, Theydon Bois (10.5km)

Access standard

Path surface: Variable depending on associated path type

Drainage: Variable depending on associated path type

Bridges/Culverts: Bridges and culverts are regularly used on these routes to manage water movement.

Access Box: Minimum 3m wide by 3m high.

Waymarking: Timber post with coloured arrow at major junctions and at regular interval in longer straight sections. (Possible transition to waymarker discs in future)

Standards of Maintenance

Waymarked trails follow a range of path types and the nature of these define the management status of the path section concerned. In addition to these maintenance standards:

Waymarkers: Annual maintenance of waymarkers to ensure they are clearly visible to users of the route. Repainting of arrows as required following inspection visits.

Condition Monitoring

Emphasis is on health and safety inspections and ensuring directional information is visible. Path condition assessment will be undertaken as required for each path type.

Frequency: All routes inspected once a year. This may be in addition to or at the same time as any associated path inspection;

- Hazard inspection undertaken for imminent threat issues including trees and unauthorised structures;
- Vegetation encroachment assessed to ensure height and width requirements are met;
- Signage: Presence and condition of waymarking signage and directional markers
-
- Structures, including gates, culverts and bollards, inspection undertaken as required under their respective Forest Standards.

Recording

Path Condition and Maintenance reports to be completed for each maintenance and inspection visit and passed to the Head of Operations who will update the path management database.

Further Guidance

TBC

	<p><u>Forest Standard: Official Natural Paths</u></p> <p>Background</p> <p>44km of routes are identified on the Official Epping Forest map as unsurfaced paths promoted for use by horse riders, cyclists and pedestrians. Routes are present across all Access Zones</p>
	<p>Routes are identified on the ground by regularly located posts with a painted white top. There may be some overlap of these paths with Waymarked trails.</p> <p>The underlying wet clay ground conditions mean that many of these routes are closed to horse riders and cyclists in the winter months to prevent damage to the paths. Some routes will have localised wet sections that on average years dry out in the summer months only.</p> <p>Initial vegetation management is required on many of these paths which are frequently encroached upon to get to the access standard.</p>

Access standard (All Access Zones)

Path surface: Unimproved natural path surface. Excessive path damage and poaching repaired or path diverted

Drainage: Localised drainage to reduce or remove summer wet sections of path

Bridges/Culverts: Presumption is that bridges and culverts are not used on these routes unless they provide a significant improvement to the access route, such as the removal of a year-round wet section.

Access Box: 4m wide by 4 m high with occasional pinch points where the path can narrow down to 2m in width but with the vertical clearance remaining at 4m for sections no more than 20m

Waymarking: Treated round softwood bollard with white painted top to Forest Standard J2/J6 Waymarkers.

Standards of Maintenance

- Frequency, five yearly or as required depending on local conditions and stated on the path maintenance program.
- The track to be kept free of encroaching vegetation and overhanging branches in line with the access box requirements
- Where cut material is to be chipped the chips are to be dispersed on the forest floor ensuring the following practice is adhered to:
 - **Do not** spray chip over moss/lichen mats, deadwood piles or logs, rides or ride sides or to the bases of semi-mature and mature trees. Avoid grassy areas and areas with flowers.
 - **Do not** create large woodchip piles but focus on a shallow even spread of chips.
 - **Do** focus on bramble and bracken areas for woodchip receptor sites.
- No timber or cordwood to be left where it could be hit by machinery undertaking routine maintenance of the bridleway.

- Existing ditches to be maintained by keeping them clear of vegetation and debris. Minor clearing of silt to be undertaken with spades. More substantial silt clearance to be reported to the Head of Operations with a description of the work required and its location
- Path Condition and Maintenance report completed for each maintenance visit

Recording

Completed Path Condition and Maintenance reports to be passed to the Head of Operations or their nominated person who will update the path management database.

Condition Monitoring

- Frequency:
 - All routes inspected every ten years;
 - Hazard inspection undertaken for imminent threat issues including trees and unauthorised structures;
 - Vegetation encroachment assessed to ensure weight and width requirements are met;
 - Ditch condition: Identify and report on works to remedy any blockages or interruptions to the water flow;
 - Path surface: Report problems with drainage that leads to persistent erosion or wet areas;
 - Path Condition and Maintenance report completed for each inspection visit.
- Structures, including culverts and bollards, inspection undertaken as required under their respective Forest Standards

Further Guidance

Closed paths: While there should be no riders/cyclists on paths closed, signs should be erected at the entrances to the path. Consider also using tiger tape to reinforce the closure, especially where more substantial works are required.

Open paths: Where riders/cyclists are permitted to ride and work is proposed then tree cutting operation signs should be erected at the entrance to paths. Only light tasks or quick moving tasks should be undertaken, eg pole sawing overhanging vegetation or small-scale scrub cutting. Where more substantial tasks are identified so that a path closure may be likely then provide a description of the work and its location to the Head of Operations.

Banksman: In all cases consider the desirability of having a banksman or someone on less intense work and who can keep an eye out for riders.

Bird nesting: During the nesting season do not work thick scrub areas and instead mark these on the map for work outside of the bird breeding season.

Uncommon species – flora and fauna: The following species should not be cut: Crab Apple, Wild Service, Butchers Broom Spindle, Buckthorn. Willow will need to be cut on a long-cycle coppice/pollarding rotation to ensure protection of egg-laying trees for Purple Emperor. Avoid cutting or adopt tree surgery rather than felling approaches with mature willows

	<p><u>Forest Standard: All-weather Paths</u></p> <p>Background</p> <p>28.3km of routes are identified on the Official Epping Forest map as surfaced paths promoted for use by horse riders, cyclists and pedestrians. Routes are present across all Access Zones.</p>
	<p>The following paths while not identified as ‘Official’ paths on the Official map are also included in this specification:</p> <ul style="list-style-type: none"> ○ The Red Path ○ Bush Wood Avenue <p>Surfaced official paths are required to facilitate a range of operational vehicles, including tractors and standard 2-wheel drive road cars.</p> <p>Path surfacing has historically been undertaken using a range of surface material from rubble from WWII bomb sites, residues from steel working to quarried materials such as MOT Type 1 Granite and hogging.</p> <p>There are several surfaced paths within the Forest that are the responsibility of third parties and are not maintained by the City of London</p> <p>There may be some overlap of the Official surfaced paths with Waymarked trails.</p>

Access standard (All Access Zones)

Path surface: Minimum width 3m including cut verges. Variable construction historically with repairs and new surfaced paths to be installed as follows:

Base layer: MOT Type 1 Granite

Wearing coarse: 5mm to dust granite

Drainage: Ditching essential on slopes and on wet sections and as required elsewhere

Bridges/Culverts: Bridges and culverts are regularly used on these routes to manage water movement.

Access Box: Minimum 4m wide by 4m high.

Waymarking: As required but not standard as with the unsurfaced official paths

Standards of Maintenance

Verge management, Frequency as cited in Table 1

Table 1: Frequency of edge vegetation management cycle by Access zone

ACTION	ACCESS ZONE (Years)*			
	A	B	C	D
1m verge cut	1	X	X	X
3m verge cut	3	3	5	5
Woody edge vegetation cut	5	7	10	10
Ditch vegetation management	3	3	5	5

Note: X- Not normally undertaken *May vary with local conditions

- The path to be kept free of encroaching vegetation and overhanging branches in line with the access box requirements
- Where cut material is to be chipped the chips are to be dispersed on the forest floor ensuring the following practice is adhered to:
 - **Do not** spray chip over moss/lichen mats, deadwood piles or logs, rides or ride sides or to the bases of semi-mature and mature trees. Avoid grassy areas and areas with flowers.
 - **Do not** create large woodchip piles but focus on a shallow even spread of chips.
 - **Do** focus on bramble and bracken areas for woodchip receptor sites.
- No timber or cordwood to be left where it could be hit by machinery undertaking routine maintenance of the bridleway.

Ditches: Existing ditches kept clear of vegetation and debris.

Path surface: The wearing coarse of paths will not normally be replaced following initial construction on these general use paths due to the long mileage and costs involved. Exceptions to this will follow a specific review of the location concerned by Forest operations and Keeper staff. Eg extensive exposure of war time rubble constructed path sub-base may need a replacement wearing course.

Condition Monitoring

- Frequency:
 - All routes inspected every five years;
 - Hazard inspection undertaken for imminent threat issues including trees and unauthorised structures;
 - Vegetation encroachment assessed to ensure height and width requirements are met;
 - Ditch condition: Identify and report on works to remedy any blockages or interruptions to the water flow;
 - Path surface: Report problems with drainage that leads to persistent erosion or wet areas;
- Structures, including gates, culverts and bollards, inspection undertaken as required under their respective Forest Standards.

Recording

Path Condition and Maintenance reports to be completed for each maintenance and inspection visit and passed to the Head of Operations who will update the path management database.

Further Guidance

Path closure: Where riders/cyclists are permitted to ride and work is proposed then tree cutting operation signs should be erected at the entrance to paths. Only light tasks or quick moving tasks should be undertaken, eg pole sawing overhanging vegetation or small-scale scrub cutting. Where more substantial tasks are identified so that a path closure may be likely then provide a description of the work and its location to the Head of Operations.

Banksman: In all cases consider the desirability of having a banksman or someone on less intense work and who can keep an eye out for riders.

Bird nesting: During the nesting season do not work thick scrub areas and instead mark these on the map for work outside of the bird breeding season.

Uncommon species – flora and fauna: The following species should not be cut: Crab Apple, Wild Service, Butchers Broom Spindle, Buckthorn. Willow will need to be cut on a long-cycle coppice/pollarding rotation to ensure protection of egg-laying trees for Purple Emperor. Avoid cutting or adopt tree surgery rather than felling approaches with mature willows

Committee(s): Epping Forest Consultative – For Consultation Epping Forest and Commons – For Decision	Date(s): 21 10 20 16 11 20
Subject: Night-time Gating proposals for Manor Road, High Beach for amenity purposes SEF 26/20	Public
Report of: Director of Open Spaces	For Consultation
Report author: Martin Newnham, Head Forest Keeper	

Summary

This report is necessary to address the continuing Anti-Social Behaviour (ASB) at the Queens Green/Pillow Mound car parks either side of Manor Road, High Beach. The easing of the COVID-19 'lockdown' guidance has seen an increase of ASB particularly focused on the High Beach car parks with Spontaneous Social Gatherings continuing into the night and well into the early morning. The SSGs are associated with the broadcast of loud music from vehicles, the lighting of barrage fireworks, large scale littering, drug taking and the consumption of legal highs. In addition to a change.org petition with 7,150 signatures (28.09.20) seeking combined action to reduce ASB, some local residents at High Beach and at Wellington Hill have complained about the continuing ASB and have formed a campaign group entitled 'Make High Beach Safe'.

Overtime working by Forest Keepers and Enforcement Officers has supported the enforcement of the night-time parking byelaw at High Beach which has reduced, but not eliminated, the problem and requires a continued long-term staffing presence, backed by Police support at High Beach which represents just 3 of Epping Forest's 55 car parks which is unsustainable. Working with Essex Police, District and County Councils options to redesign and gate the car parks, increase ANPR video surveillance of the area or enforce a night-time closure of Manor Road have been considered. The night-time closure of Manor Road is considered to be the most effective solution to controlling ASB at the site and is recommended to your Committee as a proposal for public consultation by the traffic authority. The District Council and the Police and Crime Commissioner have agreed to fund the £12,700 infrastructure needed to deliver a Traffic Regulation Order at the site in return for the City Corporation's operation of the daily opening and closure of the gates.

Recommendation(s)

Consultative members are asked to consider

- Supporting commencement of public consultation by the traffic authority on options for addressing the Anti-Social Behaviour issues at Queens Green and Pillow Mounds car parks described in the report, including the night-time closure of Manor Road, between the junctions with Wellington Hill and Paul's Nursery Road, to reduce levels of Anti-Social Behaviour.

- Should public consultation support the scheme delegate authority to the Town Clerk, Chairman and Deputy Chairman to implement the scheme and enter into a formal agreement with Essex County Council as the traffic authority for the daily opening and closing of the road control gating.

Main Report

Background

1. High Beach has a long-standing reputation as a popular Forest destination for Londoners. Both the Queens Green and Pillow Mounds open space provide a natural open break to near continuous woodland cover across much of the north of the Forest. In addition, the pubs at Kings Oak Hotel at the top of High Beach and the Duke of Wellington (now closed) at the bottom of Wellington Hill have traditionally provided 'bookends' to an attractive short walk. In effect, High Beach has all the key attributes of a popular visit namely with local walks, pubs, tea huts, ice cream van, visitor centre, public toilets and an expansive view towards Galley Hill and the Lee Valley.
2. Latterly, the rebranding of the Kings Oak Hotel as part of 'The Only Way Is Essex' or TOWIE-related scene has added an additional cachet to any visit, particularly for millennials. High Beach is also widely recognised as a meeting place that services a Public Sex Environment (PSE) advertised on the Internet at nearby Fairmead Road which is being addressed separately through an Experimental Traffic Regulation Order (ETRO).
3. As a component of the High Beach's general popularity, ASB issues have been a long running issue. The City Corporation worked previously with EFDC, as the then Highway Authority, to close Queens Grove - the road running between Pauls Nursery and Manor Roads - to deter circling parades by motor cyclists. Since 2005, the City Corporation and Essex County Council have worked to manage problems with excessive traffic speed and parade-related traffic offences on Manor Road.
4. In 2012, with funding from the City Corporation, Heritage Lottery Fund and Essex County Council, helped realise some High Beach Master Plan objectives agreed with the local community. Manor Road was 'cranked' and provided with speed tables through a land exchange between the Highway and Forest to reduce traffic speed, with the large gravel car park hard standing, - the centre of deceleration spinning by vehicles (known as dough-nutting), - modified to provide 90 degree parking bays.
5. The remodelled road layout and parking scheme has proved popular with day visitors and has had an overall positive impact on daytime traffic speeds, with the bollards, road 'cranking', chicane and speed tables requiring many vehicles to slow down to safely navigate the route. However, improvement to has seen the site continue to grow in popularity for night-time and early morning visitors. The site is associated with broadcast music from car sounds systems; the parading of sports vehicles with upgraded engines and nitrous oxide systems, the heavy

consumption of alcohol, nitrous oxide and 'skunk' marijuana and the obstruction of local traffic by pedestrian congregations on the Highway. Local reports of concern from the local community have increased from 2016 onwards and in 2017, litter picking support for the site was increased to address daily accumulation of litter on site, especially broken glass and nitrous oxide canisters.

6. Many night-time and early morning users are attracted to the site as a destination that contrasts strongly with urban London. Anecdotal discussions suggest that in addition to the attraction of the Forest, many users experience feelings of safety at High Beach allowing them to escape what they consider to be disapproval from older members of their community and enforcement services, however, many are unaware of their impacts around noise and littering on the local community.
7. Between November 2017 to February 2020, Epping Forest Keepers worked jointly with the Essex Police Community policing team carrying out joint patrols. These were carried out across the north of the Forest at least one weekend per month and during the week dependant on police resources to address ASB and crime at night within the forest. In addition Multi agency (which included Police LA officers EA, VOSA and HMRC) joint operations took place every two months focusing on environmental crime, fly tipping ASB, excise matters and road safety. Both operations were designed to detect, disrupt and deter inappropriate behaviour and crime within the Forest. While the joint patrols were extremely valuable to addressing individual crimes and provided a wider deterrent effect, they did not impact on overall levels of poor behaviour at High Beach.
8. During the national COVID-19 'lockdown', Essex County Council closed its Country Parks, the National Trust closed Hatfield Forest and some Boroughs closed London parks. Epping Forest as London's largest unenclosed open space remained open throughout 'lockdown' to provide much needed recreation facilities. Visitors travelling by car increased to such an extent that car parks were full by 10am and surrounding roads became heavily congested. By Easter weekend car parks were reluctantly and temporarily closed for 6 weeks to deter those travelling to the Forest by car.
9. As the weather grew warmer and lockdown measures relaxed, Forest 'honeypot' sites experienced huge crowds gathering to picnic with several instances of drunken and anti-social behaviour. In addition a number of illegal raves have taken place. All this has combined to create unprecedented amounts of litter with as many staff as possible redeployed to litter pick alongside many local volunteers.
10. The night-time use of High Beach car parks is contrary to section 3(11)(c) of the Epping Forest Byelaws (1980) which prohibits overnight parking between one hour after sunset and one hour before sunrise.

Current Position

11. On average visitor numbers to Epping Forest since lockdown have increased by 350% with some individual sites like High Beach experiencing an additional 525%

increase in visitors. The activities at the site have resulted in a 7,150 (28.09.20) strong change.org petition demanding more coordinated action is done to manage ASB in the village. Some members of the local community also launched a 'Make High Beach Safe' campaign in June 2020 to press for a reduction in noise, traffic offences and intimidating behaviour.

12. Since July Forest Keepers and Enforcement Officers have undertaken overtime late shifts alongside Head Forest Keeper, Callout Duty Managers and the Superintendent, with the full support of Essex Police, to enforce night-time byelaw parking bans. These activities require an onsite presence 1 hour before sunset through to midnight to enforce closure and are not sustainable in the long-term.

Options

13. Your Committee has four Options to address the impact of increasing Anti-Social behaviour on the management of the site: on disturbance to residents and City of London staff and Essex Police time:

- i. The extension of power and telecommunications infrastructure to the Manor Road area and the installation of pole-mounted Automatic number Plate Recognition (ANPR) cameras to facilitate enforcement by the City Corporation of Fixed Penalty Notice (FPN) to owners of vehicles breaking night-time byelaws and action by Essex Police to target drivers committing Road Traffic Offences. This approach would ensure the least modification to the existing landscape and would not require Forest Keepers to formally approach users to close the site. The scheme would require a substantial investment and of £94,600 to enable the scheme and may not directly stop the incidents occurring. A Data Protection Impact Assessment would be needed to be carried out and considered before installation of surveillance equipment.

This option is not recommended.

- ii. The deepening and remodelling of the 90-degree roadside bay parking bays to enable the installation of gates to facilitate the closure of car parks to close at night. This approach would require the extension of car parking into the Site of Special Scientific Interest and Special Area of Conservation. Natural England would be unlikely to provide consent for these works without the provision of substantial and expensive mitigation activity. If consent was possible, the cost of deepening and gating the car parks is estimated to cost £360,000. Such a proposal would require capital funding which does not currently meet City Corporation capital funding criteria. **This option is not recommended.**

- iii. Using a Traffic Regulation Order (TRO) to gate and close a 200-metre section of Manor Road coinciding with 96 car parking bays at night. Night-time site closure could be achieved by installing through a TRO highway compliant gates and signs at the:

- SW approach to Queens Green opposite the TRO-regulated Queens Grove and Wellington Hill allowing vehicles to bypass the closed section via Wellington Hill and Pynest Green Lane
 - NE approach to Queens Green opposite Pauls Nursery Road junction
- Additional road signing may be required to warn of the revised road structure/night-time closure. The £12,700 scheme would be implemented and funded by ECC and EFDC with CoL providing long-term assistance with the responsibility for gate opening and closing. A direct benefit is seen as the release of Essex Police and Forest Keeper time in 'policing' this location. **This option is recommended.**
- iv. Leave the current car park scheme in place reducing night-time enforcement activity to periodic joint operations as Police resources allow. **This option is not recommended.**

Proposals

14. While this is formally a Highways Scheme which only the traffic authority (not the Conservators) have power to promote, it is being implemented for amenity purposes, including partly to manage Forest facilities. The traffic authority will therefore resolve to pursue the proposal, and public and other stakeholder consultation will be required as part of the formal TRO process.
15. To prevent the displacement of offending vehicles to other immediate parts of the High Beach area, additional works to secure car parking north of the Manor Road/Paul's Nursery Road junction and at Rushey Plain turnaround car park were also identified. These planned works will be brought forward to support the scheme and will be met by Epping Forest local risk budgets. The Pillow Mounds and Queen's Green car parks offer wide ranging views, convenient and commodious destination parking, the risks of displacing this activity to elsewhere in the Forest is not considered a major risk.

Corporate & Strategic Implications

16. The recommendations of this report support the Corporate Plan with particular reference to the following aims:
- a. Contribute to a flourishing society**
 - i. People enjoy good health and wellbeing
 - b. Shape Outstanding Environments**
 - iii. Our spaces are secure, resilient and well maintained, where we
 - a. Maintain our buildings, streets and public spaces to high standards.
 - b. Build resilience to natural and man-made threats by strengthening, protecting and adapting our infrastructure, directly and by influencing others.
17. The report supports the Open Spaces Business Plan as follows:
- a. Open Spaces and historic sites are thriving and accessible.**
 - i. Our open spaces, heritage and cultural assets are protected, conserved and enhanced

- ii. London has clean air and mitigates flood risk and climate change

Implications

18. **Financial:** The District Council and the Police and Crime Commissioner have agreed to fund both the TRO costs and the £12,700 (which includes the TRO costs) infrastructure needed to deliver the TRO scheme at the site in return for the City Corporation's operation of the daily opening and closure of the gates. City Corporation staff already open and close car parks gates across the Forest and these two additional gates could be added to existing Forest Keeper duties. Such an arrangement would need to be a formal agreement with the traffic authority.
19. **Legal:** Under the Epping Forest Byelaws section 3 (11) it is an offence to park in a vehicle park between one hour before sunrise and one hour after sunset for picnic or other pleasure purposes
20. **Equality:** The area subject to proposed gating controls has 4 disabled parking bays. As all the parking on site is being subjected to controls only when parking would be illegal a review of the scheme does not indicate that any protected characteristics would be unfairly restricted.
21. **Charity:** Epping Forest is a registered charity (number 232990). Charity Law obliges Members to ensure that the decisions they take in relation to the Charity must be taken in the best interests of the Charity.

Conclusion

22. The gating of a public highway to control ASB is a significant step and will undoubtedly add to the journey length for road users travelling during closure hours who will be obliged to detour around local roads. Essex Police, together with the District and County Councils, support this approach in principle, in order to effectively manage ASB that has created difficulties at High Beach for some years, but has been magnified during the COVID-19 public health emergency. However, any final decision will be subject to consultation responses which must be considered, and the outcome of the consultation cannot be prejudged.

Appendices

- Appendix 1 – MAP

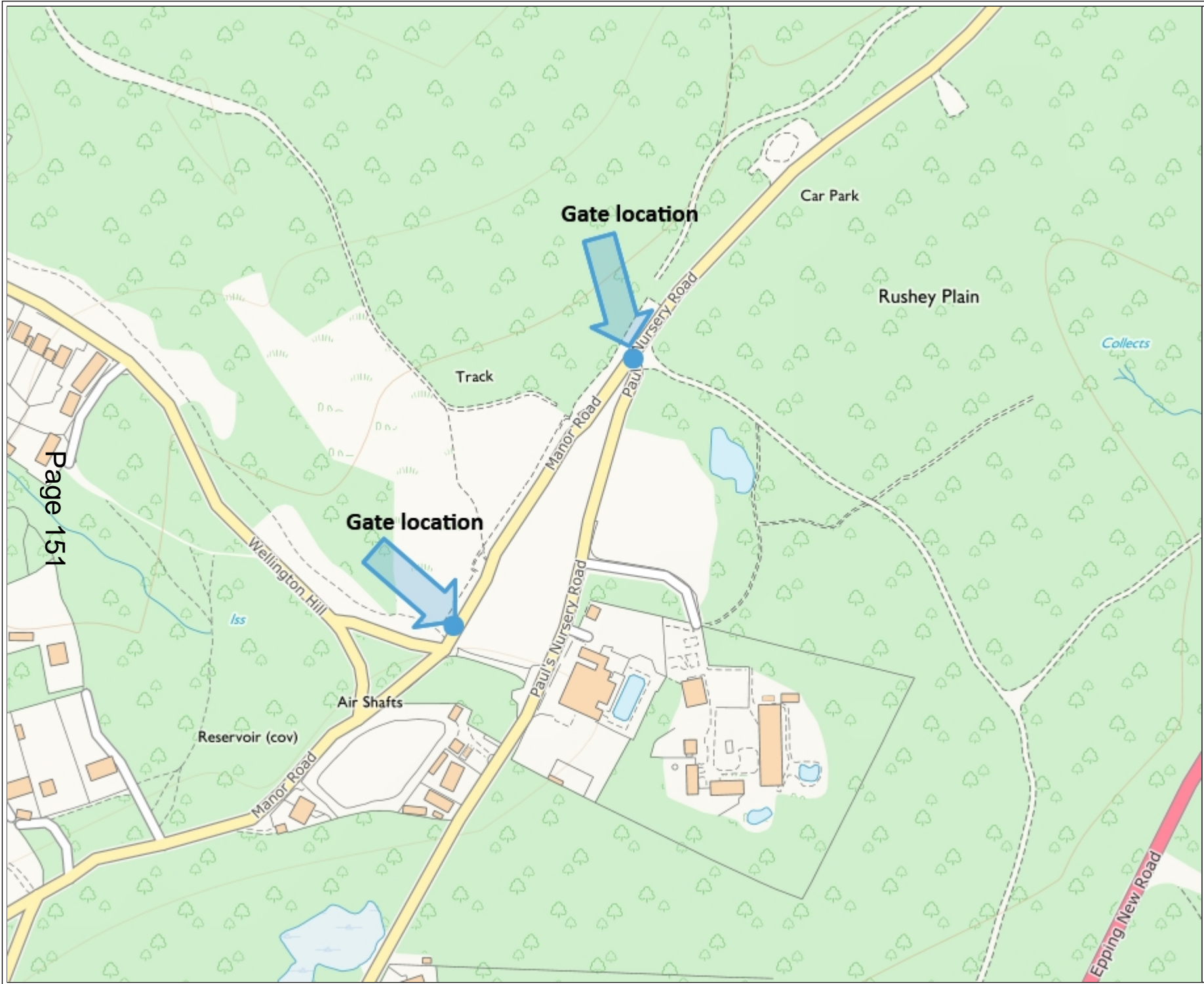
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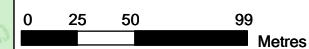
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**ETRO gate location
Manor Road High
Beech**

Created By:
M D Newnham Head
Keeper

Date Created
8 Oct 2020



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