

### **Epping Forest & Commons Committee**

Date: THURSDAY, 18 MAY 2023

**Time:** 11.00 am

Venue: COMMITTEE ROOM - 2ND FLOOR WEST WING, GUILDHALL

**Members:** Benjamin Murphy

Deputy Graeme Doshi-Smith

George Abrahams Alderman Prem Goyal Deputy Madush Gupta

Caroline Haines Jaspreet Hodgson Gregory Lawrence

The Rt. Hon. The Lord Mayor,

Nicholas Lyons

Andrew McMurtrie (Ex-Officio Member)

Deputy Philip Woodhouse Verderer Michael Chapman DL Verderer H.H. William Kennedy

Verderer Paul Morris

Verderer Nicholas Munday

**Enquiries:** Blair Stringman

Blair.Stringman@cityoflondon.gov.uk

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Ian Thomas
Town Clerk and Chief Executive

#### **AGENDA**

#### **Agenda**

#### Part 1 - Public Agenda

#### 1. APOLOGIES

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

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

To receive the Order of the Court of Common Council dates 27<sup>th</sup> April 2023, appointing the Committee and setting its Terms of Reference.

For Information

#### 4. **ELECTION OF CHAIR**

To elect a Chair in accordance with Standing Order 29.

For Decision

#### 5. **ELECTION OF DEPUTY CHAIR**

To elect a Deputy Chair in accordance with Standing Order 30.

For Decision

#### 6. **MINUTES**

To agree the public and non-public summary of the meeting held on 16 March 2023.

For Decision (Pages 7 - 12)

#### 7. MATTER ARISING

For Information

a) Action Log

Report of the Town Clerk.

#### 8. **2023/24 COMMITTEE APPOINTMENTS**

Report of the Town Clerk.

For Decision (Pages 13 - 30)

#### **Epping Forest**

#### 9. **ASSISTANT DIRECTOR'S UPDATE**

Report of the Executive Director, Environment.

For Information

#### **The Commons**

#### 10. ASSISTANT DIRECTOR'S UPDATE

Report of the Executive Director, Environment. *(To Follow).* 

For Information

#### 11. SURREY HILLS AONB BOUNDARY EXTENSION PROPOSALS

Report of the Executive Director, Environment.

For Decision (Pages 31 - 92)

#### 12. FARTHING DOWNS LAND REGISTRY MAPPING ANOMALY ADJUSTMENT

Report of the Executive Director, Environment.

For Decision (Pages 93 - 100)

#### **Natural Environment**

#### 13. **DIRECTOR'S REPORT**

Report of the Executive Director, Environment.

For Information

#### 14. RISK MANAGEMENT UPDATE REPORT

Report of the Executive Director, Environment.

**For Decision** 

#### 15. SPORTS STRATEGY VERBAL UPDATE

The Executive Director, Environment to be heard.

For Information

#### 16. CHARITIES REVIEW UPDATE

Head of Corporate Charities Funding Unit to be heard.

For Information

#### 17. QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE

#### 18. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT

#### Part 2 - Non-Public Agenda

#### 19. **EXCLUSION OF THE PUBLIC**

MOTION: The following matters relate to business under the remit of the Court of Common Council acting for the City Corporation as charity Trustee, to which Part VA and Schedule 12A of the Local Government Act 1972 public access to meetings provisions do not apply. The following items contain sensitive information which it is not in the best interests of the charity to consider in a public meeting (engaging similar considerations as under paragraphs 3 and 5 of Schedule 12A of the 1972 Act) and will be considered in non-public session.

**For Decision** 

#### 20. **NON-PUBLIC MINUTES**

To agree the minutes of the previous meeting.

For Decision (Pages 185 - 186)

#### 21. MATTERS ARISING

For Information

a) Action Log

Report of the Town Clerk.

#### 22. HISTORICAL INCOME REPORT (2018-24) FOR EPPING FOREST

Report of the Chamberlain. (To Follow).

For Information

#### 23. RENEWABLE ENERGY STORAGE FACILITY

Report of the Executive Director, Environment.

For Decision (Pages 187 - 212)

### 24. AGREEMENT IN PRINCIPLE OF A DEED OF GRANT EASEMENT AND DEED OF RELEASE

Report of the Executive Director, Environment.

For Decision (Pages 213 - 312)

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

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

#### Part 3 - Confidential Agenda

#### 27. TOM PHASE II UPDATE

The Executive Director, Environment to be heard.

For Information



#### EPPING FOREST & COMMONS COMMITTEE Thursday, 16 March 2023

Minutes of the meeting of the Epping Forest & Commons Committee held at Committee Room - 2nd Floor West Wing, Guildhall on Thursday, 16 March 2023 at 11.00 am

#### **Present**

#### Members:

Benjamin Murphy (Chairman)
Deputy Graeme Doshi-Smith (Deputy Chairman)
Caroline Haines
Jaspreet Hodgson
Verderer Michael Chapman DL
Verderer William Kennedy
Verderer Nicholas Munday

#### Officers:

Sally Agass
Jako Beatrix
Neil Chambers
Deborah Cluett
Jacqueline Eggleston
Elisabeth Hannah
Clem Harcourt
Joanne Hill
Richard Holt
Jo Hurst
Jack Joslin
Tim Munday
Simon Owen
Geoff Sinclair
Paul Thomson

- Natural Environment Department
- Chamberlain's Department
- Chamberlain's Department
- Comptroller & City Solicitor
- Natural Environment Department
- Natural Environment Department
- Chamberlain's Department
- Natural Environment Department
- Town Clerk's Department
- Natural Environment Department
- Bridge House Estates
- Natural Environment Department
- Chamberlain's Department
- Natural Environment Department
- Natural Environment Department

#### 1. APOLOGIES

There were no apologies.

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

There were no declarations of interest.

#### 3. MINUTES

**RESOLVED** – That, the public and non-public summary of the Epping Forest Committee minutes and summary of the meeting held on 26 January 2023 be approved as a correct record of the meeting.

#### 4. MATTERS ARISING

#### 4.1 Action Log

Members received a report of the Town Clerk concerning Matters Arising.

The Chairman remarked that the report was in draft format and would be updated by Officers.

2023-4 Car Parking Income: Deadline extended to May 2023

The Committee received an update on the income generated from parking charges from the Chamberlain.

The Director noted that Chamberlain would prepare a report showing historic trends over the past 5 years on income. The report would be made available for discussions at the next meeting. This should include recommendations, for example, about what to do with unused car parks in the Commons. The reporting is expected to include granular level information, including land and property at charity level.

2023-5 HM King Charles III Coronation: Closed

The Superintendent of The Commons updated Members on plans to host a volunteer workshop as part of The Big Help Out on 8<sup>th</sup> May.

2023-8 Risk Register: Deadline extended to May 2023

The Committee requested that the updated charity level Risk Registers be presented at the Committee in May.

**RESOLVED** - That, the report be noted.

#### 5. **DIRECTOR'S REPORT**

The Committee received a report of the Executive Director, Environment concerning an update on matters relating to the work of the Natural Environment Division of the Environment Department since the last Committee in January 2023.

The Chairman commended the Interim Director, noting her last day as the 31<sup>st</sup> March 2023. The Chairman also remarked that an offer had been extended to a candidate for a permanent Director's position.

In response to a question from Members, the Executive Director discussed the contents of the report, emphasising that the work done by the operational property review group in relation to land assets and identification of ownership and covenants had been completed. The Director noted that work has commenced on the property assets which would be linked to corporate and operational property and reported to the committee when completed.

Members discussed strategies for prioritising the project for the outstanding 300 assets within twelve (12) months.

Members discussed the output of the Committee's Away Day in February to agree next steps. The Chair suggested perhaps setting up a small working

group on governance, which could include one member from the consultative groups or the local government to review recommendations from the report. Recommendations would be brought back to the May meeting.

**RESOLVED** - That the report be noted.

#### 6. **ASSISTANT DIRECTOR'S UPDATE**

The Committee received a report of the Executive Director, Environment concerning an update on Epping Forest's activities between December 2022 and January 2023.

Members noted that good progress was recorded concerning the spending profile and improved income performance. It was also noted that the Avian flu deaths had stopped and there was no record of any escalation in number of deaths for a period of two months.

The Committee remarked on resources, restrictions on recruitment and the additional support required to address the increasing number of hazardous trees in the forest. Members noted the positive reactions to Protecting the Bluebells campaign.

The Committee expressed concerns at Essex County Council's nine (9) months pilot scheme where a prebooking system was introduced to access any of the recycling centres or the dumps or tips as colloquially known. This is likely to see increased fly-tipping in Epping Forest, with resource implications for the charity. The Chairman has made representations to the Cabinet Member at Essex County Council and as a result, Epping Forest has been engaged as a key monitoring partner.

**RESOLVED** – That, the report be noted.

### 7. EPPING FOREST TRUSTEE'S ANNUAL REPORT AND FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 MARCH 2022

The Committee received a Joint report of the Chamberlain and Executive Director, Environment concerning the Trustee's Annual Report and Financial Statements for the Year ended 31 March 2022 for Epping Forest (charity registration number 232990).

The Committee was informed that the accounts were signed by the chairman and Deputy Chairman of Finance Committee, the Chamberlain and the auditors and were filed by the Charity Commission by the deadline of the 31st of January 2023.

In response to questions from a Member, the Executive Director explained the climate action strategy is a significant piece of work for the corporation and one which will be incorporated in the corporation's long-term strategy.

The Committee suggested that the National Environment Department review the report.

The Chairman recommended a review of the Delegation of Authority for approval of the report to be added to the action log.

#### **RESOLVED -** That Members,

a) Note the Trustee's Annual Report and Financial Statements for the 2021/22 Financial Year.

### 8. DRAFT HIGH-LEVEL BUSINESS PLAN 2023/24 - ENVIRONMENT DEPARTMENT

The Committee received a report of the Executive Director, Environment regarding the high-level Business Plan for the Environment Department for 2023/24.

The Committee noted that the draft high level plan contained only top strategic plans which was set out in a corporately agreed format.

**RESOLVED** - That the report be noted.

#### 9. ASSISTANT DIRECTOR'S UPDATE

The Committee received a report of the Executive Director, Environment concerning activities across the Commons between December 2022 and January 2023. Reflecting the Chairman's guidance, the Assistant Directors report was presented in a shorter format but retained the essential information for Members, with a dashboard style to summarise key data and statistics.

It was noted that further refinement of the report will be made to better reflect progress on delivering the respective management and risk plan.

**RESOLVED** - That the report be noted.

## 10. ASHTEAD COMMON TRUSTEE'S ANNUAL REPORT AND FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 MARCH 2022

The Committee received a Joint report of the Chamberlain and Executive Director, Environment concerning the Trustee's Annual Report and Financial Statements for the Year ended 31 March 2022 for Ashtead Common (charity registration number 1051510) which were presented for information in the format required by the Charity Commission

**RESOLVED** – That, the reported be noted.

# 11. BURNHAM BEECHES AND STOKE COMMON TRUSTEE'S ANNUAL REPORT AND FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 MARCH 2022

The Committee received a Joint report of the Chamberlain and Executive Director, Environment. The Trustee's Annual Report and Financial Statements for the Year ended 31 March 2022 for Burnham Beeches and Stoke Common (charity registration number 232987) which were presented for information in the format required by the Charity Commission.

**RESOLVED** – That, the report be noted.

# 12. WEST WICKHAM COMMON AND SPRING PARK WOOD, COULSDON AND OTHER COMMONS TRUSTEE'S ANNUAL REPORT AND FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 MARCH 2022

The Committee received a Joint report of the Chamberlain and Executive Director, Environment concerning the Trustee's Annual Report and Financial Statements for the Year ended 31 March 2022 for West Wickham Common and Spring Park Wood, Coulsdon and Other Commons (charity registration numbers 232988 and 232989) which were presented for information in the format required by the Charity Commission

The Committee discussed the Trustee's Annual Report and Financial Statements for the 2021/22 Financial and its role in in discussions related to non-Epping Forest issues. It was clarified that Verderers may only vote on Epping Forest matters.

**RESOLVED -** that the report be noted.

#### 13. EXTENSION OF EXISTING PSPOS AT BURNHAM BEECHES

The Committee received a report of the Executive Director, Environment concerning an update on proposals to extend existing Public Space Protection Orders for reducing antisocial dog behaviours at Burnham Beeches. The Committee was supportive of the recommendation to commence consultation on the extension, but due to having become inquorate was unable to agree the recommendation.

**RESOLVED** – That, the decision be taken under urgency procedures

#### 14. EPPING FOREST AND THE COMMONS MEDIA COVERAGE

The Committee received a report of the Media Officer concerning a summary of media coverage between July 2022 to February 2023.

The Committee commended the positive effort of the media team and the Chairman requested for a media coverage forward plan to be presented in May.

**RESOLVED** - that the report be noted.

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

There were no questions.

## 16. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT There were no urgent items.

#### 17. EXCLUSION OF THE PUBLIC

**RESOLVED** - The following matters relate to business under the remit of the Court of Common Council acting for the City Corporation as charity Trustee, to which Part VA and Schedule 12A of the Local Government Act 1972 public access to

meetings provisions do not apply. The following items contain sensitive information which it is not in the best interests of the charity to consider in a public meeting (engaging similar considerations as under paragraphs 3 and 5 of Schedule 12A of the 1972 Act) and will be considered in non-public session.

#### 18. NON-PUBLIC MINUTES

That due to having become inquorate the non-public minutes of the meeting held on 26 January 2023 be agreed at the next meeting.

#### 19. **MATTERS ARISING**

The Committee received a report of the Town Clerk.

#### 19.1 Action Log

The Committee noted the report.

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

There were no questions.

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

There were no items of urgent business.

The meeting ended at 1.20pm.		
Ol a '		
Chairman		

Contact Officer: Blair Stringman
Blair.Stringman@cityoflondon.gov.uk

Committee(s)	Dated:
Epping Forest and Commons Committee	18 May 2023
Subject:	Public
2023/24 Committee Appointments	
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	N/A
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of: Deputy Town Clerk	For Decision
Report author: Blair Stringman, Town Clerk's Department	

#### **Summary**

The Committee is asked to consider its appointments for the next twelve months. Provision for appointing a Member to serve as an observer on the Natural Environment Board formally known as the Open Spaces & City Gardens Committee is also to be considered. It is expected that this appointment would encompass the strategic Open Spaces capacity of that Board.

#### **Recommendations**

#### It is recommended that:-

- 1. Consideration be given to the appointment and composition of the following Consultative Committees and Groups:
  - Ashtead Commons Consultative Group;
  - Burnham Beeches and Stoke Common Consultative Group;
  - West Wickham, Spring Park and Coulsdon Commons Consultative Group;
  - Epping Forest Consultative Group;
  - Deer Management Oversight Group; and the
- 2. Consideration be given to the appointment of a representative to the Natural

**Environment Board** for the ensuing year as a local observer for this Committee.

3. That the relevant terms of reference for the consultative bodies be updated to reflect that they will be supported locally by the Environment Department and that the job titles listed be updated.

#### **Main Report**

#### **Background**

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

#### **Options**

That consideration be given to making the various appointments detailed in the report, from amongst the Committee membership. Consideration would then be given to filling any subsequent vacancies from the Court of Common Council.

- The Committee are asked to appoint the Chairman, Deputy Chairman and two representatives onto the Ashtead Common Consultative Group.
- The Committee are asked to appoint the Chairman, Deputy Chairman and two representatives onto Burnham Beeches and Stoke Common Consultative Group.
- The Committee are asked to appoint the Chairman, Deputy Chairman and two representatives onto the West Wickham, Spring Park and Coulsdon Commons Consultative Group.
- The Committee are asked to appoint the Chairman, Deputy Chairman and <u>two</u> representatives, along with all four Verderers onto the Epping Forest Consultative Group.
- The Committee are asked to appoint the Chairman, Deputy Chairman and four representatives to the Deer Management Oversight Group.
- The Committee are asked to appoint <u>one</u> representative onto the Natural Environment Board.

It was agreed from the previous Governance Review that local consultative bodies be removed from formal centrally-administered structures and granted greater autonomy to be run locally. In addition, it is proposed that the terms of reference for the consultative bodies detailed in this report replace references to the Town Clerk with local officers to reflect the decision for these bodies to be supported locally to allow suitable freedom to better reflect their role as consultative rather than decision making bodies. Also, that the terms of reference are updated to accurately reflect correct job titles where they have changed.

#### **Implications**

There are no financial, legal or risk implications.

#### Conclusion

That consideration be made to making appointments to the various Consultative Committees and groups detailed in the report. Also that the terms of reference be updated as suggested to reflect current administration responsibilities and correct job titles.

#### **Appendices**

- Appendix 1 Epping Forest Consultative Group Terms of Reference
- Appendix 2 Ashtead Common Consultative Committee Terms of Reference
- Appendix 3 Coulsdon Commons, West Wickham & Spring Park Consultative Group Terms of Reference
- Appendix 4 Burnham Beeches and Stoke Common Consultative Group Terms of Reference
- Appendix 5 Deer Management Oversight Group Terms of Reference

Contact: Blair Stringman, Governance Officer blair.stringman@cityoflondon.gov.uk

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Author: Jo Hurst

Date: September 2022



# **Epping Forest Consultative Group – Terms of Reference**

### **Table of Contents**

Purpose of Group	2
Conduct, attendance and other principles	2
Scheduling, location and public access	
Allocation of positions	
Requirements and responsibilities	6

### **Purpose of Group**

- 1. The Epping Forest Consultative Group considers and discusses areas of current concern or debate at Epping Forest. It receives public reports prior to their consideration by Epping Forest and Commons Committee and provides advice or opinion on those matters.
- 2. Members of the Epping Forest and Commons Committee (EF&CC) will be in attendance to listen to views expressed by consultees, and to represent them back to the EF&CC where necessary and appropriate.
- 3. Minutes of meetings and outcomes of the Consultative Group's discussions are considered by the Epping Forest and Commons Committee in a public report to inform decision making. Likewise, most recent minutes of the Epping Forest and Commons Committee are to be reviewed by the Consultative Group.
- 4. The EF Consultative Group is not a formal decision-making body, but views will be noted in formal reports to the Epping Forest and Commons Committee.
- 5. Consultative Group meetings are to be scheduled several weeks prior to alternate Epping Forest and Commons Committee meetings to consider papers and matters arising, with sufficient time scheduled for revisions to papers to be made for Epping Forest Committee, and minutes to be included in documentation.

### Conduct, attendance and other principles

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

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

### Scheduling, location and public access

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

### Allocation of positions

- 15. The EF Consultative Group has representation from Members of the EF&CC including Verderers. Chairman and Deputy Chairman may attend according to availability and agenda.
- 16. Meetings are chaired by the Assistant Director Environment (previously Superintendent of Epping Forest) or other nominated Officer or Member in their absence.
- 17. Other City of London officers will attend as required.
- 18. The meetings are administered by a nominated City of London Environment Officer.
- 19. Attendants are nominated members of groups that hold a specified interest in Epping Forest, and that have a comparably large membership, and/or a broad geographically spread membership from across the Forest and with knowledge or interest in the themes of heritage; recreation/sport;

- conservation; general/informal use or voluntary and friends' groups.
- 20. Tenants, business partners or other organisations with commercial interest in Epping Forest (or wider City of London Open Spaces) are not invited to attend as other routes exist for such input. Local authorities of all tiers also have access to direct liaison forums and are not invited to attend.
- 21. In the interests of impartiality and equality, political parties and religious groups are not invited to attend.
- 22. Organisations with or supportive of extremist policies or views including supporting, planning or carrying out criminal activity motivated by a political or ideological viewpoint are prohibited
- 23. Groups nominating a representative must be formal, constituted organisations. This may include rule books, articles of association, standing orders or other formal agreement to which members sign-up to and adhere. This must include their own definitions of formal membership and their subscription terms, meetings and voting rights.
- 24. Groups must also ensure that their constitution (or equivalent) includes or makes reference to that groups Equality Statement or policy, which must be provided to the City of London on request.
- 25. Invitations to express interest and to nominate representatives are advertised through press release, social media, email and direct correspondence by City of London.
- 26. Applications require details of how the nominating organisation meets the above criteria and must include:
  - The theme of interest the organisation wishes its application to be considered under.
  - A brief (maximum 150 words) explanation of the purposes and aims of the organisation.
  - Number of members at time of application (see definition at 29) below)
  - Name and contact details of nominated representative.
  - Copies of Constitution, Equality Statement and other relevant documentation.
  - Any other relevant and necessary information requested by Officers at the time of application.
- 27. A balance of themes of interest is ideally met as follows:

Nature Conservation	3
Conservation groups in Forest, or with wider remit	
Friends/Voluntary	3

Formal working groups e.g. litter pickers groups, 'Friends of' etc.	
Heritage	
Historical societies, rural preservation etc.	
Informal users	2
Schools, Youth groups, families associations, local forums and interest	
bodies	
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

- 28. Should more expressions of interest be received than can logistically be accommodated, selection will be made by members of the Epping Forest and Commons Committee by the following (not in order of importance):
  - Size of membership
  - Geographical area of interest (i.e. area of Forest covered)
  - Theme of interest
  - Record of attendance (if existing attendee)
- 29. Where membership numbers are declared by an applying organisation or group, these must be active members – i.e. those who have actively subscribed or joined providing full name and contact details; agree to a constitution or similar as aforementioned, including invitation to attend and vote at annual general meetings; and requirement to renew periodically (typically annually), most usually with an associated fee. Members must be counted as individuals subject to such terms, and not households or groups. 'Membership', for the purposes of this definition does not include customers paying for goods or services or 'passive' subscriptions or sign ups to mailing lists either electronic or hard copy, or followers or group members to social media broadcasts, chats and communications.
- 30. Epping Forest and Commons Committee may appoint further members or co-opt representatives (for example subject matter experts) to attend where it deems appropriate.
- 31. The Consultative Group serves as established for three years (starting in 2018), after which the invitation and nomination process outlined above is repeated.

### Requirements and responsibilities

- 32. Nominated representatives must meet criteria similar to those set out by the Electoral Commission for eligibility for local government election:
  - At least 18 years old
  - Not employed by the City of London, or another organisation holding a commercial interest in Epping Forest or other CoL open spaces.
  - Have not been sentenced to a term of imprisonment of three months or more (including suspended sentences), without the option of a fine, during the five years before nominations close.
  - Not disqualified under the terms of the Representation of the People Act 1983 (which covers corrupt or illegal electoral practices and offences relating to donations).
- 33. Representatives must commit to representing the views of their organisation and members. Organisations that have applied but could not be accommodated will be advised to communicate with members representing their theme of interest either formally (e.g. affiliation) or informally and such communication is encouraged.
- 34. Representatives must share agenda and documentation internally within their organisation (subject to confidentiality) as well as minutes and outcomes of discussions.
- 35. Any representative or organisation found to contravene any of the terms herein may be excluded from the Consultative Group permanently and without notice by order of the Chairman of the Epping Forest and Commons Committee.

#### **Ashtead Common Consultative Group**

#### **Terms of Reference**

#### **Purpose**

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

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

#### Membership

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

#### Attendance by members of the public.

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

#### General

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

#### **Appendix 1**

#### Protocol for additional meetings site visits

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

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

#### Coulsdon Commons, West Wickham & Spring Park Consultation Group

#### **Terms of Reference**

#### **Purpose**

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

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

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

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

#### Membership

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

#### Attendance at meetings by members of the public.

11. Members of the public may attend meetings of the Consultation Group.

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

#### General

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

#### Appendix 1

#### Protocol for additional meetings site visits

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

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

#### **Burnham Beeches and Stoke Common Consultative Group**

#### **Terms of Reference**

#### **Purpose**

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

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

#### Membership

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

#### Attendance by members of the public.

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

#### General

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

#### Appendix 1

#### Protocol for additional meetings site visits

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

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

#### **Epping Forest Deer Management Oversight Group (DMOG)**

#### **Draft Terms of Reference**

#### **Purpose**

- DMOG will provide oversight of the implementation of the Epping Forest Deer Management Strategy approved by the Epping Forest and Commons Committee ("the Committee")
- DMOG oversight will include:
  - Making recommendations to the Committee to ensure the discharge of its duties under Epping Forest Acts 1878 & 1880 section 4 duty to ensure deer are 'preserved as objects of ornament in the Forest'.
  - To review annually the Epping Forest Deer Management Strategy to ensure relevance and appropriateness and make recommendations to the Committee.
  - To monitor the implementation of the Deer Management Strategy throughout the year and to bring to the attention of the Committee any issues that may affect the appropriate implementation of the strategy or give rise to other concerns that should be brought to the attention of the Committee.
  - o To make recommendations to the Committee on the most effective and costefficient method to implement the Deer Management Strategy.
- DMOG will consider the scientific and best practice basis for deer management activity based upon evidence provided by officers
- DMOG will scrutinise officer population projections of wild and parkland deer herds based on evidence obtained by officers regarding the species, sex, and age of the deer together with cull data from adjoining estates where this is made available
- DMOG will review and provide an assessment of officer's annual recommendations to the Committee, based on stocking rates furnished by the Independent Review on a proposed cull figure range for both the Birch Hall Park Deer Sanctuary and the Buffer Land
- DMOG will satisfy itself that the Epping Forest risk assessments, safe systems of work, food hygiene arrangements, carcass handling and waste disposal records are suitably legally and financially compliant for the management of deer management operations

• DMOG will appraise regular assessments of the welfare of the Birch Hall Park deer regarding weight and condition of the deer herd and ancillary activity designed.

#### **Other Business**

 Officers, will regularly update DMOG on broader plans for the management of Birch Hall Park the buffer land including statutory works, grant applications, government consultations and liaison with neighbouring landowners.

#### Membership

- DMOG will have 4 members, drawn from the elected members of the Committee.
- The members will be appointed with the approval of the Committee and will be members of DMOG in a personal capacity.
- One member of DMOG will be appointed by the DMOG members as the Group's Chair.
- DMOG will be provided with the services of an independent and suitably qualified deer manager.

#### Governance

• Membership of DMOG will be based on a one-year term renewed through the annual Committee appointment process conducted in January each year.

#### Meetings

- DMOG meetings will be held bi-monthly during the fallow deer season and by arrangement outside the season.
- Officers will provide papers to support DMOG's oversight together with a summary record of the meetings proceedings.
- All papers will remain confidential and be subject to the City of London Corporations
   Members Code of Conduct
- The groups status will be as an informal meeting outside CoL Committee arrangements

### Agenda Item 11

Committee(s):	Dated:
Epping Forest and Commons Committee – For decision	18/05/2023
Subject: Surrey Hills AONB Boundary Extension Proposals	Public
Which outcomes in the City Corporation's Corporate	4,9,10,11,12
Plan does this proposal aim to impact directly?	
Does this proposal require extra revenue and/or	No
capital spending?	
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the	N/A
Chamberlain's Department?	
Report of: Juliemma McLoughlin, Executive Director,	For Decision
Environment Department	
Report author: Geoff Sinclair, Assistant Director The	
Commons	

#### Summary

On the 13 October 2022 your committee agreed the recommendation to 'Approve further involvement in the Area of Outstanding Natural Beauty (AONB) boundary consultation process....' involving both the Chilterns and the Surrey Hills AONBs. Natural England (NE) after extensive technical assessments and local liaison launched a consultation on the proposed boundary extensions for the Surrey Hills AONB on the 7<sup>th</sup> March 2023. Their proposals include adopting the greater part of the City Corporation's Farthing Downs site within the AONB. The adjacent City Corporation sites Coulsdon Commons, Kenley Common and Riddlesdown were not considered to have met the natural beauty criterion required for an AONB. It is proposed that the City Corporation supports NE's recommendation to include part of Farthing downs in the AONB with closing date for comments being the 13<sup>th</sup> June 2023.

#### Recommendation(s)

#### Members are asked to:

 To support the inclusion of part of Farthing Downs in the proposed Happy Valley extension to the Surrey Hills AONB (Option 2)

#### Main Report

#### Background

- 1. On the 13 October 2022 a report was presented to your committee concerning forthcoming proposals to extend the boundaries of the Surrey Hills and Chilterns Areas of Outstanding Natural Beauty (AONB). Your committee agreed the recommendation to 'Approve further involvement in the AONB boundary consultation process with the current intention being 'inclusion within their boundaries' as follows:
  - Burnham Beeches and Stoke Common within an extended Chilterns AONB boundary.
  - The Coulsdon Commons within an extended Surrey Hills AONB boundary
- 2. On the 7 March 2023 Natural England (NE) launched its consultation on the proposed boundary extensions for the Surrey Hills AONB Appendix 1. The closing date for comments concerning the proposals is the 13<sup>th</sup> of June 2023.
- 3. AONB's are designated for the purpose of conserving and enhancing their natural beauty. Natural England is responsible for considering which areas in England meet the criterion, set down in law, for being included in an AONB, and whether to proceed with their designation. Under the Countryside and Rights of Way Act 2000 ("CRoWA") NE has the power to designate land as AONB as set out in Section 82(1) of CRoWA. Section 83 (7) of CRoWA gives NE the power to vary the boundaries of existing AONBs.
- 4. NE can designate an area as AONB where it is satisfied that it has such natural beauty that its designation is desirable for the conservation and enhancement of its natural beauty. The Natural Environment and Rural Communities Act 2006 clarified that the wildlife and cultural heritage of an area, as well as its natural features, can contribute to the natural beauty of landscapes.
- 5. To designate an area as AONB NE sets out to answer three questions:
  - Does the landscape have outstanding natural beauty?
  - Is it desirable to designate this landscape as an AONB for the conservation and enhancement of its natural beauty?
  - Where should the boundary be drawn?
- 6. The key effects of designation as an AONB are:
  - to provide powers for local planning authorities to take appropriate action to conserve and enhance the natural beauty of AONB's;
  - to place a duty on public bodies to have regard to the purpose of enhancing and conserving the natural beauty of the AONB;
  - it engages the powers and duties of conservation boards, including in respect
    of the protection of the countryside and avoidance of pollution and in
    connection with the conservation and enhancement of the natural beauty of
    AONB's and public understanding and enjoyment of AONB's.

- it places a duty on relevant local authorities and conservation boards to prepare and publish plans which formulates their policies for the management of the AONB and for the carrying out of their functions in relation to it
- 7. The Surrey Hills AONB boundary review commenced early 2022 as a 'call for evidence' at which point the Assistant Director sought Chairman's approval to provide supporting material for the inclusion of the four Coulsdon Commons within the AONB boundary, i.e. Coulsdon Commons, Farthing Downs Common, Kenley Common and Riddlesdown, all of which are included in the recently created South London Downs National Nature Reserve
- 8. This report outlines how the proposed extension of the Surrey Hills AONB proposals, (Appendix 1) will impact on the City Corporations landholding at the Farthing Downs. It also makes recommendations for responding to the consultation.

#### **Current Position**

- 9. NE have identified eighteen proposed extension areas for the Surrey Hills AONB. A significant proportion of the City Corporation's Farthing Downs Common has been included in one of the proposed extension areas known as the 'Happy Valley Extension', see page 27 of Appendix 1 for full details.
- 10. NE considered the Happy Valley extension suitable for inclusion in the AONB due to:
  - The dramatic chalk valley system of Happy Valley and surrounding farmland.
  - Network of ancient woodland and wooded shaws that create a patchwork across areas of downland and arable farmland.
  - Extensive areas of nationally significant calcareous grassland habitat.
  - Narrow rural lanes and tracts of land only accessible on foot.
- 11. The Farthing Downs landscape was seen to be influenced by urban fringe land uses and consideration was given to drawing back the proposed boundary to the AONB to exclude transitional landscape influenced by the surrounding urban development. This would have resulted in almost all the Down being excluded due to a lack of clear features to follow on the ground. Given the ridge of downland is valued for its scenic view into Happy Valley, natural heritage (it is a Site of Special Scientific Interest and National Nature Reserve) and cultural heritage (Scheduled monuments present) Natural England propose taking a pragmatic decision to extend the boundary to the urban edge which enabled the 'feature' to be included in its entirety.
- 12. The proposed extension of the AONB to include Farthing Downs has been reported by Time Out 30<sup>th</sup> March 2023 as 'London is set to get its first Area of Outstanding Natural Beauty'.

13. Coulsdon Commons, Kenley Common and Riddlesdown were not considered to have met the natural beauty criterion required for an AONB. See Appendix 2 for a map of the proposed extension area on Farthing Downs.

#### **Options**

- 14. Option 1: To object to the inclusion of part of Farthing Downs in the proposed Happy Valley extension to the Surrey Hills AONB. The proposal follows significant local consultation and technical assessment by Natural England. Not including the land in the AONB could reduce future opportunities for landscape scale working and funding opportunities under the AONB would be lost. It would avoid the impact of any additional planning requirements under the AONB. The City Corporation's management of Farthing Downs is in line with best practice and additional costs arising from the proposal are thought to be minimal and within the bounds of normal operating practice. **Not recommended.**
- 15. Option 2: To support the inclusion of part of Farthing Downs in the proposed Happy Valley extension to the Surrey Hills AONB. The proposal follows significant local consultation and technical assessment by Natural England and is in line with the previous EFCC agreement that inclusion in the AONB is the Committees initial intention. Inclusion in the AONB would help to progress greater landscape scale working and provide additional funding opportunities through the AONB. There is the potential of increased and potentially adverse visitor pressure and additional planning requirements that come with being in an AONB may impact some decisions. Management costs are not expected to be impacted in any significant way. Recommended
- 16. Option 3: To support the inclusion of part of Farthing Downs in the proposed Happy Valley extension to the Surrey Hills AONB and recommend that adjacent sites of Coulsdon Commons, Kenley Common and Riddlesdown also be considered for inclusion. The assessment for including sites followed a rigorous technical process that considered all the key factors. It is unlikely that case for inclusion can be made that would override the technical assessments. Not recommended

#### **Proposals**

17. As reported to your Committee on 13<sup>th</sup> October 2022 (Page 48 Para 24) the Government's aims for its protected landscapes, including AONBs, supports key City Corporation strategies and outcomes in this area

#### **Corporate & Strategic Implications**

Strategic implications

- 18. The proposal would help to meet the following City Corporation strategic objectives:
  - Corporate Plan Shape Outstanding Environments: 'We have clean air, land and water and a thriving and sustainable natural environment......Our spaces are secure, resilient and well maintained'

 Corporate Climate Action Strategy: "Preparing our response to natural and manmade threats; Providing thriving and biodiverse green spaces and urban habitats."

#### Financial implications

19. Short-term costs are expected to be mainly Officer time, associated with progressing the favoured option and will be fully contained within existing local risk resources. No additional long-term costs are anticipated should Farthing Downs be included in the AONB. Inclusion within the AONB may allow the City Corporation improved access to additional Government/external funding.

Resource implications

20. None

Legal implications

- 21. The provisions of CRoWA (including those summarised at paragraph 6) will apply upon Natural England effecting the designation by issuing relevant Notice and the designation being confirmed by the Secretary of State.
- 22. Designation has no effect on who makes decisions on applications for planning or development consent. These decisions are for the local planning authority or Secretary of State. In an AONB, local planning authorities must have regard to the purpose of conserving and enhancing the natural beauty of AONB's in exercising their functions (including in deciding planning applications) Through this duty designation provides a further statutory protection regime for Farthing Downs such as from the impact of housing and other development.
- 23. All other legal implications are included in the body of the report

#### **Charity Implications**

24. Farthing Downs is part of the four Coulsdon Commons registered charity (232989). 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.

Risk implications

25. None

**Equalities** implications

26. None

Climate implications

27. Clearer links with neighbouring landowners will help to facilitate sympathetic management of Farthing Downs at the landscape scale further promoting opportunities for improved climate resilience of sensitive habitats and species.

Security implications

28. None

#### Conclusion

- 29. Following extensive technical assessment and local liaison Natural England have published consultation proposals on the extension of the Surrey Hills AONB.
- 30. The proposals include adopting part of the City Corporation's owned Farthing Downs site within the AONB. Adjacent City Corporation sites Coulsdon Commons, Kenley Common and Riddlesdown were not considered to have met the natural beauty criterion required for an AONB.
- 31. Minimal additional costs are envisaged from the site being included in the AONB. There are resourcing and landscape scale site management opportunities potentially arising from being in the AONB.
- 32. It is recommended that the City Corporation supports the adoption of the inclusion of part of Farthing Downs in the proposed extended AONB boundary.

#### **Appendices**

Appendix 1 – Surrey Hills Area of Outstanding Natural Beauty: Boundary Variation Project Consultation Document, Natural England

Appendix 2 - Map of the proposed extension area on Farthing Downs

#### **Background Papers**

1. Chiltern and Surrey Hills AONB boundary reviews: Report to the Epping Forest and Commons Committee, 13 October 2022

#### **Geoff Sinclair**

Assistant Director, The Commons



# Surrey Hills Area of Outstanding Natural Beauty: Boundary Variation Project

## **Consultation Document**

A proposal to extend the Surrey Hills Area of Outstanding Natural Beauty



## **About Natural England**

We are the government's adviser for the natural environment in England, helping to protect England's nature and landscapes for people to enjoy and for the services they provide.

Within England, we are responsible for:

- Promoting nature conservation and protecting biodiversity.
- Conserving and enhancing the landscape.
- Securing the provision and improvement of facilities for the study, understanding and enjoyment of the natural environment.
- Promoting access to the countryside and open spaces and encouraging open-air recreation.
- Contributing in other ways to social and economic wellbeing through management of the natural environment.

To find out more about our work visit:

https://www.gov.uk/government/organisations/natural-england

This document contains useful information that will help you to comment on a proposed extension to the Surrey Hills Area of Outstanding Natural Beauty.

We recommend that you read it before completing the response form.

## **Contents**

Foreword	1
Introduction	2
What are Areas of Outstanding Natural Beauty?	3
Who looks after Areas of Outstanding Natural Beauty?	3
How are Areas of Outstanding Natural Beauty designated?	3
Applying the approach to the review of the Surrey Hills AONB Boundary	7
The Proposed Extension Areas	8
<ul><li>Wey Valley, Farnham</li></ul>	9
■ Hog's Back	11
■ Binscombe Hills	13
■ Enton Hills	15
<ul><li>Wey Valley, Farley Hill</li></ul>	17
<ul><li>Cranleigh Waters</li></ul>	19
<ul><li>Hatchlands and East Clandon</li></ul>	21
Headley Hills	23
Chipstead	25
Happy Valley	27
Caterham Woods	29
Woldingham Valleys	31
Limpsfield	33
■ Godstone Hills	35
Betchworth Hills and River Mole	37
Ockley Low Weald	39
Dunsfold Low Weald	41
Dockenfield Hills	43
Minor boundary refinements	45
The areas proposed for designation as part of the Surrey Hills AONB	47
What happens next?	48
Implications of designation	49



Looking northwest across Chipstead Bottom

### **Foreword**

Landscape is how many people come to understand the scale and richness of the natural world around them, whether it is through the view from their window or the majesty of distant mountains. It helps them to appreciate nature's diverse habitats, distinctive species and a whole range of public benefits such as carbon storage, clean water and opportunities for recreation. But it is beauty in the landscape that draws and holds the eye. We are very fortunate to have some fantastic landscapes in the south east of England, many of which are already legally protected as National Parks and Areas of Outstanding Natural Beauty. For some years there has been discussion about whether the Surrey Hills, a chain of varied upland landscapes, should be reviewed in relation to their outstanding natural beauty. Natural England has now produced proposals for extending the existing Surrey Hills AONB and this consultation seeks your views about these proposals. I'd like to recognise the amount of work that has been undertaken via informal evidence gathering and I thank all who were involved for this.

We are keen to hear from everyone who has an interest in the area and cares about its future. If you would like to have your say, please spend some time reading this consultation document and send us your views by completing the enclosed response form. The consultation ends on 13 June and you can send us your comments any time before this date. If you would like to speak directly to the team working on this project then please drop in at one of the events we are holding locally in the area (see local press or visit the website for details): https://consult.defra.gov.uk/ne-landscape-heritage-andgeodiversity-team/surrey-hills-boundary-variation

We will keep everyone informed of progress by publishing the outcome of this consultation later next year. We look forward to receiving your responses to this important consultation.





**Tony Juniper** Chairman of Natural England

## Introduction

Natural England is the public body responsible for conserving and enhancing the natural environment in England. One of Natural England's responsibilities is to decide whether an area should be given special status and protection by designating it as a National Park or Area of Outstanding Natural Beauty (AONB). The purpose of AONB designation is to conserve and enhance an area's natural beauty. AONBs are designated by Natural England using statutory powers in the Countryside and Rights of Way Act 2000.

For many years there has been a local desire to extend the Surrey Hills Area of Outstanding Natural Beauty (SH AONB) to include locally valued landscape such as Areas of Great Landscape Value (AGLV) and wider countryside. These proposals have been supported by the AONB Board and local authorities and a formal request was put to Natural England by the AONB Board proposing a variation to the AONB boundary based on an early study by Hankinson Duckett Associates (HDA) in 2013.

In December 2013 Natural England's Board confirmed it would take forward a project to determine if the AONB boundary should be varied and to define a recommended boundary. In 2021 the Natural England Board committed to testing and trialing a new approach to designation work with a strong emphasis on collaboration and engagement. Subsequently Natural England Officers established a project Management Advisory Group (MAG) and Technical Advisory Group (TAG) in order to include partners in project governance and improve engagement. An Area of Search was defined collaboratively between Natural England and the MAG, and used as a starting point for assessment. A consortium of specialist consultants was appointed to undertake the assessment which began with an extensive phase of stakeholder engagement, including the general public as part of a 'Call for Evidence' which ran throughout December 2021 and January 2022.

Assessments to determine which landscapes meet the legal requirements for inclusion in an AONB have now been completed and proposals have been developed to designate specific areas. We would now like to give all those with an interest in the proposed extensions the opportunity to express their views on whether these areas should be designated.

The purpose of this consultation is to seek your views on whether these areas have the qualities required for inclusion within an AONB, whether they should be designated and whether the proposed boundaries are appropriate.

A response form is enclosed for you to express your views, but please read this Consultation Document first – it contains important information that you will find useful in making your comments.

Further information, expressing the detailed analysis which led to these recommendations, is also available as separate Supporting Documents. Copies of the Supporting Documents can be downloaded from <a href="https://consult.defra.gov.uk/ne-landscape-heritage-and-geodiversity-team/surrey-hills-boundary-variation">https://consult.defra.gov.uk/ne-landscape-heritage-and-geodiversity-team/surrey-hills-boundary-variation</a> or by emailing us at <a href="mailto:SurreyHillsAONBboundaryreview@naturalengland.org.uk">SurreyHillsAONBboundaryreview@naturalengland.org.uk</a> or by writing to:

Meg Johannessen, Natural England, 5th Floor, Northgate House, 21 – 23 Valpy Street, Reading, Berkshire, RG1 1AF

The closing date for comments to arrive is 13th June 2023.

## What are Areas of Outstanding Natural Beauty?

Areas of Outstanding Natural Beauty (AONB) are designated for the purpose of conserving and enhancing their natural beauty. There are 34 Areas of Outstanding Natural Beauty in England including the Surrey Hills AONB. Designation as AONB means giving an area special legal protection.

Once an area has been designated by Natural England, activities relating to the purpose of AONB designation are coordinated and led by local authorities, who also have a legal responsibility to produce a Management Plan for the area. In carrying out their duties they often form wider partnerships with other organisations. Any public body taking a decision or undertaking activity that affects land in an AONB has a duty to have regard to the purpose of the designation when carrying out its work.

AONBs are largely funded by a contribution from the local authorities in the area and a grant from Defra and may also seek additional funding from other sources.

## Who looks after Areas of Outstanding Natural Beauty?

Most AONBs have a management team whose role encompasses the management of the staff team and its finances. The Surrey Hills AONB team is hosted by Surrey County Council. Individual posts on the team include the AONB Director, Marketing and Communications Officer and a Farming in Protected Landscapes (FiPL)Programme Manager. It is supported by a Finance and Officer Manager, Surrey Hills Working Group and Grants Administrator and Planning Advisor. The AONB management team is overseen by the Surrey Hills Board and wider AONB Partnership.

Section 89 (2) of the CRoW Act 2000, places a duty on relevant local authorities to prepare and publish a plan which formulates their policy for the management of an AONB and for the carrying out of their functions in relation to it and a further duty to review the plan at "intervals of not more than five years". An AONB Management Plan sets out the policy for the management of an AONB and includes an action plan for carrying out activity in support of the purpose of designation. The AONB Team co-ordinates, facilitates and delivers certain countryside management functions as set out in the Management Plan.

The local authorities whose area wholly or partly includes land currently designated as part of the Surrey Hills AONB and to which the statutory powers and duties relating to AONBs apply, are Surrey County Council (SCC), Waverley District Council (WDC), Guildford Borough Council (GBC), Mole Valley District Council (MVDC), Reigate and Banstead Borough Council (RBBC) and Tandridge District Council (TDC). Planning and development control in an AONB remain the responsibility of the local authorities.

## How are Areas of Outstanding Natural Beauty designated?

Natural England is responsible for considering which areas in England meet the criterion, set down in law, for being included in an AONB, and also whether to proceed with their designation. To do this Natural England carries out assessments, consults local authorities and people and undertakes the legal process that results in an area being designated. The final decision, however, lies with the Secretary of State for Environment, Food and Rural Affairs. An area only becomes part of an AONB when the Secretary of State confirms a legal order made by Natural England.

What is the legal criterion for designating an Area of Outstanding Natural Beauty? Natural England has a power under the Countryside and Rights of Way (CRoW) Act 2000 to designate land as AONB as set out in Section 82(1) of the Act. In summary this states that Natural England can designate an area in England as AONB if it is satisfied that it has such natural beauty that its

designation is desirable for the conservation and enhancement of its natural beauty. Section 83(7) of the same Act gives Natural England the power to vary the boundaries of existing AONBs.

Natural beauty is more than just "beautiful scenery." The Natural Environment and Rural Communities Act, 2006, clarified that the wildlife and cultural heritage of an area as well as its natural features can contribute to the natural beauty of landscapes. For example the presence of particular wildlife or visible archaeological remains can make an appreciable contribution to an area's sense of place and heighten perceptions of natural beauty. Natural beauty can also be found in landscapes that have been altered by humans through agriculture, forestry or in parkland.

#### How are landscapes assessed for designation?

The approach used for the Surrey Hills AONB partial boundary review follows Natural England's approved "Guidance for assessing landscapes for designation as National Park or Area of Outstanding Natural Beauty in England" (2021).

To designate an area as AONB, Natural England must answer the questions below:

- Does this landscape have outstanding natural beauty?
- Is it desirable to designate this landscape as an AONB for the conservation and enhancement of its natural beauty?
- Where should the boundary be drawn?

Only if it is considered that there is sufficient natural beauty, will an assessment of desirability be warranted and only if the conclusion of this is positive, will detailed boundary proposals be developed. Having reached this conclusion, the legislation also requires Natural England to consult the relevant county and district councils.

Each of these stages is described briefly below. The full assessments are available as Supporting Documents and accessible via

https://consult.defra.gov.uk/ne-landscape-heritage-and-geodiversity-team/surrey-hills-boundary-variation.

#### Identifying a Study Area for assessment

Firstly, a decision must be taken on the extent of the area to be assessed for designation. This is in order to make the assessment manageable and to ensure that resources are concentrated on areas which are likely to have potential for designation. This process is guided by Natural England and the MAG and refined through the 'Call for Evidence' /public engagement, and initial assessments of an area.

#### **Stakeholder Engagement**

This involves participative evidence gathering utilising a 'Citizen Space' approach to enable stakeholders (including the general public) to contribute their 'local expertise'. This is facilitated through the creation of a website, development of a smart phone app enabling people to gather evidence (including photographs) in the field, an interactive Story Map within the website where people can review their evidence and that of others, and communication and support mechanisms including online webinars.

#### Describing the character of an area

The European Landscape Convention 2000 defines 'landscape' as: "An area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors." The first step in understanding what makes any landscape special is to describe it in a relatively neutral way.

Landscape character is defined as a distinct, recognisable and consistent pattern of elements that makes one landscape different from another, rather than better or worse. Landscape character assessment is the tool used to define areas of differing landscape character and to describe them in a neutral way. The Surrey Landscape Character Assessment and other assessments are used by Natural England (along with other data sets and field assessment) to define 'Evaluation Areas' for assessment.

#### **Evaluation stage**

The **Evaluation Areas** identified are then tested against the single statutory criterion of 'outstanding natural beauty'. The outcome of this stage is the identification of areas which are considered likely to meet the natural beauty criterion and which can then be considered as a **Candidate Area** for further consideration in relation to the desirability of designation.

#### Making judgements about natural beauty

Once an Evaluation Area has been described, it is evaluated to establish whether it has sufficient natural beauty for it to be designated. Natural beauty is a subjective characteristic of a landscape and ultimately involves value judgments. In deciding whether an area has outstanding natural beauty, Natural England must consider the merits of an area in comparison with ordinary countryside.

In order to make this judgment in a transparent and consistent way, Natural England uses a set of factors which are considered to contribute to natural beauty. These are set out in Table 1. A more detailed version of this Table can be found in the Supporting Documents.

Table 1: Factors Related to Natural Beauty

#### **Landscape Quality**

This is a measure of the physical state or condition of a landscape.

#### **Scenic Quality**

The extent to which a landscape appeals to the senses (mainly, but not only, the visual senses).

#### **Relative Wildness**

The degree to which relatively wild character can be perceived in a landscape and contributes to its sense of place. (NB all of England's landscapes have been influenced by human activity over time, which is why we use the term relative wildness).

#### Relative tranquillity

The degree to which relative tranquillity can be perceived in a landscape (i.e. whether an area appears quiet, remote and relatively free from human influence or development).

#### **Natural Heritage Features**

The influence of natural heritage on people's perception of the natural beauty of a landscape. Natural heritage includes features formed by natural processes, wildlife, wild flowers and geological features.

#### **Cultural Heritage**

The influence of cultural heritage (such as buildings, archaeology and designed landscapes) on people's perception of the natural beauty of a landscape and the degree to which associations with particular people, artists, writers or events in history contribute to such perception.

Not every factor listed in Table 1 needs to be present in a landscape in order for it to have sufficient natural beauty. By considering all the factors together a judgement can be made as to whether an area meets the criterion for designation overall. Applying this analysis enables the extent of land likely to meet the statutory criterion to be more precisely defined. These refined areas are called Candidate Areas for designation.

Once an area has been identified as qualifying for inclusion in a Candidate Area, Natural England must determine whether designation of the area is desirable.

#### Deciding whether it is desirable to designate

An area of land that satisfies the natural beauty criterion is capable of being included in an AONB. However, designation does not follow automatically: it is for Natural England to exercise its judgment as to whether

a Candidate Area, which meets the natural beauty criterion should become part of an AONB in order to achieve the statutory purpose of the conservation and enhancement of natural beauty.

To establish whether it is desirable to designate an area as an AONB, Natural England asks the five questions set out in Table 2:

#### Table 2: Is it Desirable to Designate?

Is there an area which satisfies AONB technical criterion?

Is the area of such **significance** that the AONB **purpose** should apply to it?

What are the issues affecting the area's **special qualities** and understanding and enjoyment?

Can AONB purposes be best pursued through the **management mechanisms**, **powers and duties** which come with AONB designation?

Are there **other relevant factors** which tend to suggest whether it is or is not desirable to designate the area?

Having considered these questions and relevant evidence, it is for Natural England to decide whether or not, a particular area is of such national significance that it should be designated as AONB and managed to achieve the statutory purpose.

#### Identifying a suitable boundary

A detailed boundary is drawn for each proposed AONB extension area to show where it is desirable for a particular designation to begin and end. Natural England develops proposed boundaries using a suite of principles, including those in Table 3 below.

#### **Table 3:** Boundary Setting Considerations

**Transition areas:** Natural beauty often changes gradually over a sweep of country rather than suddenly from one field to another. In these 'areas of transition,' the boundary should be drawn towards the high quality end of the transition in a manner that includes areas of high quality land and excludes areas of lesser quality.

**Types of boundary:** Wherever possible, a clear physical feature should be chosen.

Other administrative boundaries: Administrative boundaries (such as county or parish boundaries) are often unsuitable because they are hard to see on the ground or do not correspond with the area of high natural beauty. Similarly, land ownership is not itself a reason for including or excluding land from designation – there will often be instances where part of a landholding sits within the designated area and part sits outside.

**Inclusion of settlements:** Towns and villages at the edge should only be included if they are within and part of a sweep of qualifying countryside.

**Splitting of settlements:** Towns or villages should not normally be cut in two by an AONB boundary where it can be avoided.

**Incongruous development:** Unsightly development on the edge of an AONB should generally be excluded unless it is of a temporary or transient nature.

**Proposed Developments:** Land at the edge of a proposed designation that is identified for development in development plans, or has existing planning permission should normally be excluded. Land should not be included merely to seek to protect it from specific development proposals.

**Features of interest:** Areas and features of wildlife, geological, geomorphological, historic, cultural or architectural value should be included where practicable.

## Applying the approach to the review of the Surrey Hills AONB Boundary

This Consultation Document presents only outline information on the process undertaken for this project and about the proposed extension areas identified during the process. If you would like more detailed information about these areas or about the initial identification of the Area of Search (Study Area), Evaluation Areas or Candidate Areas, the assessment of the desirability of destination, development of the proposed boundaries, or wish to refer to any of the Figures mentioned in the text below, please refer to the Supporting Documents.

#### **Defining the Study Area**

The Study Area was initially defined by the Natural England and the MAG and was loosely based on the extent of the existing Area of Great Landscape Value (AGLV) as illustrated on Figure. 1. Two other factors were also relevant in defining the extent of land selected for evaluation:

- Firstly, the responses and evidence provided by stakeholders during the 'Call for Evidence.'
  This led to the extension of the Study Area.
- Secondly, preliminary assessment which determined areas at some distance from the AONB and separated by land which was unlikely to qualify. This led to the exclusion of areas from further study.

The 'Call for Evidence' on factors which support natural beauty, resulted in over 2000 representations from stakeholders, including local communities, and provided a wealth of information as illustrated on Figure 8. This information was used to inform and plan site work, supplement the collation of information in relation to natural beauty factors, and provided a valuable collection of images which have been used throughout this report. It therefore made a material difference to assessment and informed professional judgements.

#### **Characterisation stage**

The Surrey Hills Landscape Character Assessment provides information on landscape character for the majority of the Study Area and assisted in the definition of the Evaluation Areas for assessment. Character assessments for relevant adjoining areas were also consulted. Variations in character informed the subdivision of Evaluation Areas where necessary, in order to make assessment more manageable.

#### **Evaluation stage**

Fourteen discrete Evaluation Areas were defined to be taken forward to the detailed evaluation stage. They are illustrated on Figure 2.

Each Evaluation Area and subdivision was tested against the factors outlined in Table 1. The evaluation included in-depth assessment of published information and data on a wide range of relevant issues. The relevance and significance of this information was also further tested in the field.

In some places, the initial Study Area and 'Call for Evidence' highlighted boundary anomalies. These included small parcels of land between an urban area and the existing AONB boundary, or where the existing AONB boundary does not follow a feature on the ground. These minor boundary anomalies have also been reviewed.

#### **Defining a Candidate Area**

The evaluation process resulted in the identification of areas considered to meet the statutory natural beauty criterion (Figure 10). These areas include river valleys and Greensand hills, areas of chalk dip slope, chalk valleys in the North Downs, as well as areas of Low Weald, and have been used as a basis for defining a proposed boundary variation to the Surrey Hills AONB. The evaluation process also identified a number of minor boundary refinements.

## **The Proposed Extension Areas**

The proposed boundary is illustrated on Figure 12 Index Map (found in the centre of this document). The detailed maps (Figures 13-29 referred to on Figure 12) can be found in the Supporting Documents. Taken together the land within the proposed boundary comprises the area for designation and includes land at:

- Wey Valley, Farnham
- Hog's Back
- Binscombe Hills
- Enton Hills
- Wey Valley, Farley Hill
- Cranleigh Waters
- Hatchlands and East Clandon
- Headley Hills
- Chipstead
- Happy Valley
- Caterham Woods
- Woldingham Valleys
- Limpsfield
- Godstone Hills
- Betchworth Hills and River Mole
- Ockley Low Weald
- Dunsfold Low Weald
- Dockenfield Hills

Each of these eighteen proposed extension areas is considered separately below. The text summarises the case for designation of each area. It sets out the extent to which the natural beauty criterion is met, the desirability of designation and the proposed boundary.

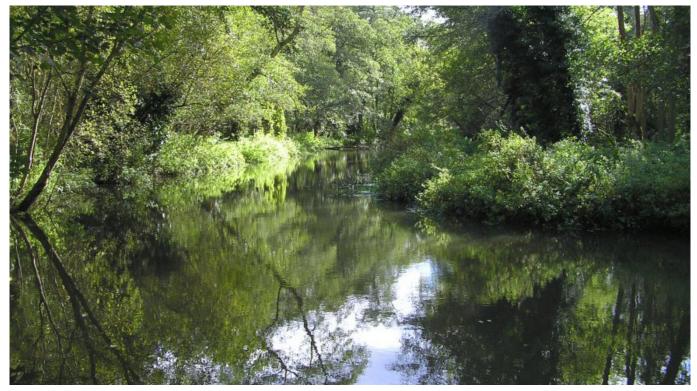


Beech tree at Banstead Woods

## Proposed Wey Valley, Farnham extension

#### Context

This area comprises the Wey Valley between Waverley Abbey and Farnham. It is contiguous with the existing AONB and forms a continuation of the distinctive and visually contained pastoral valley, comprising both valley floor and wooded slopes. It is defined by the main break in slope on the upper valley sides and the edge of adjacent built-up areas.



Moor Park Nature Reserve

#### Extent to which the natural beauty criterion is met

The Wey Valley is considered suitable for inclusion within the proposed extension because of its:

- Distinctive and intact, rural pastoral character comprising traditional meadows, wetland habitats (rare in the context of Surrey) and mature wooded slopes.
- Narrow sinuous and sometimes incised lanes and tracks that impart time depth and continuity.
- Collection of historic buildings and features which contribute to scenic qualities/add interest including High Mill, Moor Park House, Mother Ludlam's Cave and WWII pill boxes.

#### **Significance**

Valley landscapes are an important component of the Surrey Hills AONB. The AONB as currently designated includes a significant section of the Wey Valley which weaves its way through Greensand Hills to the south. The existing AONB boundary follows roads including Waverley Lane and Camp Hill and as a result does not extend north of Waverley Abbey.

This proposed extension area, encapsulates typical qualities of the Wey Valley, bringing into the AONB the continuing valley (and its tributary - Bourne Stream) as far as the railway line on the edge of Farnham. Special qualities are derived from the meandering watercourse, traditional meadows and wetlands which combine with deciduous wooded slopes and pasture to create a landscape which is textured and colourful through the seasons, intimate in scale and is perceived as separate from adjoining areas of denser built development. Views across the valley floor to wooded slopes are framed and sometimes contain historic buildings which add to scenic qualities, while along rural tracks and lanes through the wooded slopes, there are historic features of interest and natural habitats which enhance perceptions of tranquillity and contact with nature.

#### Key Issues affecting the area's special qualities

The following issues are currently experienced in this area and are relevant to considering the difference AONB designation may make:

- Domestication of valley slopes where back gardens extend from low density housing either side of the valley.
- Suburbanisation of lanes as a result of residential development.
- Invasion of non-native vegetation affecting biodiversity interest.
- Decline of active management of meadows and pastures.

The area is closely linked (in visual, natural and cultural heritage terms) with the continuation of the valley to the south which lies within the existing AONB. Natural England considers that strategic management of the valley as a whole (given its natural beauty and special qualities), and extending it close to the settlement of Farnham, would be beneficial. This would ensure more consistent forward planning and decision making through the focus provided by the statutory duties and powers which would apply. The dedicated purpose of the Surrey Hills AONB Management Plan and the assistance that the AONB team can provide through partnership work, in supporting land managers and others, will help to resolve issues affecting the Wey Valley as noted above.

#### Other relevant factors

Low Density Housing on Valley Slopes: Low density development associated with Compton and Moor Park occurs within the Wey Valley slopes. Given the wooded nature of these slopes, this development does not exert a strong influence on the valley landscape, despite the fact that some boundary curtilage treatment is having a domesticating influence in places. The Natural Beauty Assessment concluded that the wooded valley slopes met the natural beauty criterion forming part of the valley landscape. These slopes were therefore included in the Candidate Area. Natural England considers that since the area meets the natural beauty criterion overall, inclusion of the wooded slopes, even where they form part of low-density development, would encourage sensitive curtilage treatments and woodland management. Natural England has therefore concluded that it is desirable that this land, where it forms part of the valley slopes, is included in the proposed extension.

Transitional Areas: In the north of the area the valley floor is affected by infrastructure which physically severs the valley and which exerts noise and light intrusion. Consideration was given to defining a boundary within this transition and also to the inclusion of features of interest on the edge such as Sites of Nature Conservation Interest (SNCI). On balance the railway line was considered a suitable boundary within the transition. The SNCIs to the north of the railway were not included as they do not lie within a tract of qualifying land.

#### The proposed boundary

The proposed boundary has been drawn to include the valley unit as a whole following roads, lanes, railway and hedgerows/woodland. The boundary includes the valley slopes, even where they contain some low density development. As a result, the proposed boundary splits the Built Up Area Boundary and the South Farnham Arcadian Area as defined in the Farnham Neighbourhood Plan. Natural England Boundary Considerations state that settlement should not normally be split in two, however, in this instance the importance of the wooded undulating slopes which define the Wey Valley, the loose character of development and the dominance of landscape qualities, have collectively weighed in favour of including these areas within the proposed extension. This did not extend to include non-qualifying areas which lie beyond the valley, including low density development on more elevated and flatter land to the northeast (part of the Moor Park Arcadian Area), or the inclusion of denser urban development to the west.

## **Proposed Hog's Back extension**

#### Context

This area broadly includes the northern slopes to the Hog's Back. It extends from the existing AONB boundary (which cuts across the mid slopes) northwards to the fringes of Ash Green and Flexford. It includes a number of extensive areas of ancient woodland, natural springs, settlement and farmland which collectively, and together with close proximity views of the Hog's Back ridge, express high landscape and scenic qualities.



View looking northwards towards the Hog's Back

#### Extent to which the natural beauty criterion is met

The area includes:

- The sweep of agricultural landscape which forms the lower slope and immediate context to the Hog's Back an iconic and distinctive feature of the existing AONB.
- The historic spring line village of Wanborough, extensive blocks of ancient woodland with carpets of spring flowers, and broad open arable fields defined by hedgerows with veteran oaks.
- Historic lanes and tracks.

#### **Significance**

This proposed extension includes the broad sweep of landscape which forms the immediate context to the Hog's Back and comprises open arable slopes, extensive areas of ancient woodland and the spring line village of Wanborough. The gentle undulations of landform and blocky nature of woodland give rise to a visual simplicity within which mature oaks in woods, hedgerows and fields (reflecting former parkland) and historic lanes and tracks add time depth and visual interest. The area retains a rural tranquil character despite close proximity to the A31 and development to the north. Compositions created by its landscape elements, combined with close proximity views of the Hog's Back, give rise to scenic qualities and local distinctiveness.

#### Key Issues affecting the area's special qualities

The following issues are currently experienced in this area and are relevant to considering the difference AONB designation may make:

- Establishment of leisure plots/recreation activity and ad hoc development which is visually intrusive or fragments landscape pattern.
- Neglect of woodland and loss of structure and diversity.
- Visual intrusion from adjacent future allocated development.
- Loss of visual simplicity of open slopes, and unity of the Hog's Back as a distinctive topographic feature, due to land use change.

Statutory designation as AONB with the immediate application of relevant statutory powers and duties and its formal inclusion in the Surrey Hills AONB Management Plan would strengthen the future Page 50

conservation and enhancement of the area's natural beauty and would place a statutory duty on all public bodies to have regard to the area's conservation and enhancement. Particular benefits may include greater support to Local Authority planning enforcement and also implementation of the Nature Recover Strategy to connect ancient woodlands.

#### Other relevant factors

**Transitional Landscape:** The assessment identified that the qualities of the landscape were transitional moving away from the Hog's Back, in part due to weaker visual links to this topographic feature, but also due to influences from adjacent urban areas and land uses which have caused visual and physical fragmentation. In the west, the assessment identified non-qualifying land around Tongham and Ash Green. Here the boundary was pulled back to White Lane - a clear feature within the transition. Between Ash Green and Flexford the boundary was drawn around the most intact areas of woodland/farmland that formed part of the sweep of lower slopes adjacent to the Hog's Back, excluding areas which had become fragmented by ad hoc development and urban fringe land uses. East of Flexford, the transitional nature of the landscape was given careful consideration, including the extension of the boundary as far as the railway line. However, the gently falling topography towards the railway and areas of secondary woodland associated with Backside Common, were not considered to be outstanding. Consideration was also given to the adoption of West Flexford Lane as the boundary, however this was judged to cut across the sweep of land, especially east of Homestead Farm, where the land rises slightly at Wildfield Copse. On balance the boundary was drawn within the transition, ensuring the inclusion of farmland which formed part of an uninterrupted sweep of land and areas of prominent woodland such as Wildfield Copse, whilst excluding land which was less visually or physically connected and of lesser quality.



Wanborough Manor, Wanborough - 16th century (Grade II Listed)

**Allocated Development:** Land at Blackwell Farm is allocated for development within the Guildford Borough Local Plan: strategy and sites (site allocation 26). It is also associated with a separate allocation for the proposed access route (site allocation 27) off the A31 to the south, which will cut across an area of existing AONB. Natural England Guidance on boundary considerations is clear that where land is allocated for development on the margins of an area of qualifying land it should be excluded. Whilst the land covered by the Blackwell Farm allocation/access was considered to meet the natural beauty criterion and is consistent with land further west, it nonetheless has been excluded due to the development allocation.

#### The proposed boundary

The proposed boundary provides an appropriate join with the existing Surrey Hills AONB boundary and includes the qualifying higher quality land and woodland to the north of the Hog's Back, whilst excluding land which is of lower quality due to fragmentation and transitions in landscape and scenic quality. A boundary line has been identified adopting clear features on the ground such as roads, the edge of woodland and tracks. At Down Place consideration was given to adopting the edge of the Blackwell Farm allocation. However, this was not marked by a clear feature on the ground. A decision was therefore made to take the boundary further west and along the track and public right of way west of Down Place and Wellington House. This enabled the boundary to follow a clear line on the ground while also excluding the allocated site in its entirety.

The proposed boundary addresses boundary anomalies associated with the existing AONB boundary where it cuts across open slopes and does not follow clean features on the ground.

## **Proposed Binscombe Hills extension**



Looking north across The Grange and Compton Common to the Hog's Back on the skyline

#### Context

This area comprises the wooded scarp slopes that define Eastbury Park and farmed slopes surrounding The Grange and Compton Common on the edge of Binscombe, with views across to the Hog's Back to the north.

#### Extent to which the natural beauty criterion is met

The areas which are considered suitable for inclusion within the proposed extension include:

- Steep sandstone scarp clocked in ancient ash, oak, hazel and sweet chestnut woodland with carpets of bluebells, wild garlic and other woodland ground flora in spring.
- Open arable slopes which provide the context to Compton Conservation Area associated with Compton Common and The Grange.

#### **Significance**

The significance of this area relates to its association with Eastbury Park, the wooded scarp slopes comprising areas of ancient woodland namely Fox Hanger, Eastbury Copse and Kiln Copse) which define and enclose the parkland. These woodlands extend eastward along the steep slope including Glebe Wood SNCI beyond which are open arable slopes across the Glebe Conservation Area and Compton Common, both of which are split by the current AONB boundary. The open slopes afford uninterrupted views across the AONB to the Hog's Back and include the brick farmhouse and surrounding farmland associated with the artist and potter Mary Wondrausch.

#### Key Issues affecting the area's special qualities

The following issues are currently experienced in this area and are relevant to considering the difference AONB designation may make:

- Ash dieback within woodlands along the scarp slope.
- Recreational pressure on landscape due to proximity of adjacent conurbations.
- Inappropriate tree and woodland planting which can disrupt vegetation patterns.
- Suburbanisation of lanes including changes to hedgerows relating to property boundary treatment.

The area is closely linked (in visual, natural and cultural heritage terms) to land already within the existing AONB. Natural England considers that strategic management of this area as a whole would be beneficial. Including these areas within the AONB would ensure more consistent forward planning and decision making through the focus provided by the statutory duties and powers which would apply. The dedicated purpose of the Surrey Hills AONB Management Plan and the assistance that the AONB team can provide in supporting land managers and others will help to resolve issues affecting the area as noted above.

#### Other relevant factors

During the assessment process, issues associated with defining a boundary included the extent to which wooded and arable slopes between built development at Binscombe/Farncombe and north of Charterhouse should be included. Here the landscape extends as a narrow finger into the urban area and becomes increasing influenced by proximity to development. In addition, particular scrutiny was given to Binscombe village. This settlement was noted has having cultural heritage interest and local vernacular buildings but has also become conjoined with Farncombe along its southern edge. Although the settlement still relates to the wider landscape context, Natural England Guidance is clear that settlements on the edge of an area of qualifying land should normally be excluded and that settlements should not be split by a boundary. The Waverley Borough Local Plan includes Binscombe within the Farncombe settlement boundary. On this basis, and to avoid the splitting of a settlement, it was concluded that Binscombe should be excluded in its entirety, and the boundary drawn around its outer edge.



Bluebell woods on the steep slopes above Eastbury Park

#### The proposed boundary

The proposed boundary has been drawn to include higher quality land which forms an uninterrupted sweep of landscape with the wider AONB, and which is unaffected by adjoining housing development. The boundary follows the edge of roads, tracks and woodland. Between Binscombe and the property named Endsleigh, the boundary follows a mature hedgerow which also defines the boundary of the Waverley Borough administrative area.

Where the boundary skirts the edge of development it follows property boundaries. Many of these locations were not readily accessible and reliance has been placed on OS Mastermap to define the extent of property boundaries where they back onto woodland.

## **Proposed Enton Hills extension**



Johnston's Lake looking south to the wooded hills west of Witley.

#### Context

This area includes the undulating wooded hills between Witley and the existing AONB and areas of contrasting open water. It also includes some small boundary changes in the Busbridge area to include the Registered Park and Garden associated with Gertrude Gykell and ancient woodland hangers.

#### Extent to which the natural beauty criterion is met

The area includes:

- The 17th century mill complex at Enton and associated mill ponds and hammer pond as well as the former designed parkland connected to Witley Manor.
- Intimate wooded hills around Enton Green and Great Enton including Potter's Hill and Parson's Hanger as well as Enton Hall and the narrow winding incised Water Lane.
- Contrasting open water of Johnston's Lake which nestles at the foot of rising land to the south.
- Registered Park and Garden at Munstead Wood associated with Gertrude Gykell and containing a collection of listed buildings which reflect local vernacular.

#### **Significance**

This proposed extension forms a continuation of the intimate, enclosed and secretive landscape typical of the greensand hills. This area has a high concentration of woodland, with notable linear hanging woodlands, and historic interest expressed in its vernacular listed buildings, registered parkland and incised winding lanes which, combined with complex and sometimes steep slopes and hills, give high landscape and scenic quality. This is an inward-facing, traditional pastoral and small-scale landscape which has local visual complexity, and a tranquil, remote character.

#### Key Issues affecting the area's special qualities

The following issues are currently experienced in this area and are relevant to considering the difference AONB designation may make:

Intrusion of development beyond the area and urban fringe land uses such as pony paddocks which can create visual clutter.

- Pressure for recreation development including fishing activity, commercialisation and golf course development resulting in built infrastructure and changes in landscape patterns.
- Road and rail improvements such as widening, lighting and signage which can impact on tranquillity and rural character.
- Introduction of non-native hedgerows along lanes, and lack of woodland management.

Statutory designation as AONB with the immediate application of relevant statutory powers and duties and its formal inclusion in the Surrey Hills AONB Management Plan would strengthen the ability of the AONB team to ensure the future conservation and enhancement of the area's natural beauty and would place a statutory duty on all public bodies to have regard to the area's conservation and enhancement.

#### Other relevant factors

During the assessment process, issues were raised regarding the inclusion of Witley village, urban fringe land uses in the vicinity of the village and the impact of the railway line. South of the village the cricket pitch and play area sit within a wider sweep of high quality well wooded landscape. Similarly, the former parkland landscape associated with Witley Manor provides a high quality setting to Witley Ponds, connecting to the historic Enton Mill complex. The railway was not considered a dominate feature, being set down on lower lying land and passing through areas of woodland, such that high quality landscape to the west was possible to include. However to the west of Enton Mill the landscape is influenced by the urban edge of Witley and landscape patterns have become disrupted by pony paddocks and associated post and rail fencing. Further north, Upper and Lower Enton Lakes sit in a peripheral location in less undulating landscape and are separated from qualifying land by the railway. These areas have therefore been excluded along with the whole of the settlement of Witley.

In the area of Enton Green boundary options to exclude or include linear housing along the lanes were considered. Dwellings do not have a significant impact on the character and qualities of the wider area and therefore the simpler boundary along Station Road, which includes the settlement was judged to be most robust. Consideration was also given to features on the edge including Busbridge Lakes.

#### The proposed boundary

The proposed boundary provides an appropriate join with the existing Surrey Hills AONB boundary and includes the high quality undulating and wooded landscapes between the existing AONB and Witley. A boundary line has been identified along roads and rear of properties as well as the railway and tracks. The boundary does not split the settlement of Witley but does include land which forms a sweep of higher quality landscape to the east of the village.

After careful consideration Natural England has concluded that the boundary should not be taken west to include the Registered Park and Garden at Busbridge Lakes due to its mixed condition and quality and the potential for the boundary to become convoluted. The existing boundary along Hambledon Road was therefore preferred.



Seventeenth century mill complex at Enton Mill

## Proposed Wey Valley, Farley Hill extension



View south from River Wey Navigation towards wooded slopes of Farley Hill

#### Context

This area comprises the Wey Valley meadows where they lie adjacent to Farley Hill. Here the juxtaposition of flat open meadow and meandering course of the River Wey, contrasts with the rising wooded backdrop of Farley Hill to create a landscape of high scenic quality. The textured valley floor appears seamless with the greensand hills beyond, forming a well-defined and visually contained traditional valley floor landscape.

#### Extent to which the natural beauty criterion is met

The extension includes:

- The valley floor meadows of the River Wey between Penny Bridge and Tilthams Corner Road.
- The wooded lower slopes of Farley Hill, west of Unsted Wood.

#### **Significance**

The area forms a small section of valley floor which is physically and visually connected to the wooded slopes of Farley Hill. Its special qualities are derived from the juxtaposition of flat open and textured meadow with the rising wooded greens and hills. The meandering course of the River Wey through this section retains its natural character and there is little visual intrusion from surrounding built up areas. As a result this section of the Wey Valley forms a seamless extension to the AONB enabling the inclusion of an area of unspoilt traditional valley floor meadows.

#### Issues affecting the area's special qualities

The following issues are currently experienced in this area and are relevant to considering the difference AONB designation may make:

- Visual and noise intrusion from adjacent development.
- Ad hoc development and urban fringe land uses along rural lanes.
- Establishment of non-native invasive species along the river course.
- Loss of wet pastures due to drainage and lack of appropriate grazing.
- Lack of active traditional woodland management such as coppicing.

Page 56

The special qualities associated with this section of the Wey Valley include intact valley character defined by the valley meadows and strong wooded slopes to the south and east. Its wetland and woodland habitats, as well as natural meandering watercourse, could all benefit from the broader integrated management and protection that AONB designation would bring. This integrated management and the planning status of AONB designation could also address many of the issues noted above.

#### Other relevant factors

During the assessment process, the Wey Valley was identified as comprising areas of fragmented valley floor affected by adjacent infrastructure and development, which have impacted on the qualities of the valley as a whole and fragmented it from the wider AONB. Overall the Wey Valley was not considered to have sufficient natural beauty to warrant designation as part of the AONB. However, the assessment did highlight an area of floodplain meadow adjacent to the AONB at the foot of Farley Hill which remained contiguous with the AONB and benefited from strong visual links to Farley Hill.

This was considered in detail at the boundary assessment stage along with boundary anomalies relating to the existing AONB boundary west of Unsted Wood (here the boundary does not follow a feature on the ground). This area of valley floor was considered to be in good condition, to express high levels of scenic quality as well as areas and features of historic and natural interest.

Consideration was given to the effect of noise intrusion from traffic on the A3100 and of development which backs onto the towpath to the west. Whilst these issues undermine the natural beauty of parts of this area, the intact character of the valley floor and its seamless views towards the rising wooded slopes of Farley Hill were considered to outweigh these issues.

#### The proposed boundary

The proposed boundary enables the whole of the Unsted Wood and Bunker's Hill SNCI to be included in the AONB. This area of woodland sits on steep slopes and is currently split by the existing AONB boundary which does not follow a clear line on the ground.

The SNCI at Tilthams Rough sits on the northern edge of the proposed boundary extension. Consideration was given to including this area of woodland within the boundary. However, the woodland has a mixed character and condition and is influenced by adjacent development and road noise. On balance it was excluded from the extension and the boundary drawn along the towpath.

The proposed boundary extension includes part of the Wey Valley Meadows Site of Special Scientific Interest (SSSI), where it lies adjacent to the wooded slopes of Farley Hill, but excludes the remainder of the designation north of Tilthams Corner Road. This is not unusual where natural heritage designations cover significant areas. The natural beauty of the landscape for inclusion in the AONB designation is the primary consideration and in the valley to the north of Tilthams Corner Road the natural beauty is undermined by adjacent development and infrastructure.

## **Proposed Cranleigh Waters extension**



View east from Whipley Manor Farm across the farmland of Cranleigh Waters towards the rising hills at Winterfold and Hurtwood

#### Context

This area comprises the undulating farmland between the existing AONB and extends across the valley of Cranleigh Waters from the A281 in the west to the B2128 in the east. It includes the settlements of Wonersh, Chilworth, Shamley Green and the hamlet of Burley Green as well as areas of former common including Run Common, Rushett Common, Lordshill Common, Norley Common, Wonersh Common and Shalford Common. In the north of the area are two distinctive greensand hill outliers namely Chinthurst and Bartlett Hills which share many of the qualities of the wider AONB greensand hills. In the central and southern areas there are long distance views to the wooded greensand hills of the wider AONB which visually contain the area and contribute to its scenic qualities.

#### Extent to which the natural beauty criterion is met

The extension includes:

- The mixed farmland landscape between the A281 and B2128.
- Greensand hill outliers of Chinthurst Hill and Bartlett Hill.
- Network of ancient woodland shaws and former commons.
- Linear historic features including Wey & Arun Canal and disused railway now used by the Downs Link long distance route.

#### **Significance**

The area forms undulating and richly wooded farmland through which the meandering course of Cranleigh Waters weaves, past former commons on gravel terraces and between greensand hill outliers such as Chinthurst and Bartlett Hills. Ericaceous vegetation in road verges and woodlands, along with mixed arable and pasture farming, gives rise to a mosaic of land uses, colour and texture through the seasons that delight the senses. Historic settlement including that of Wonersh, Birtley Green and Shamley Green nestle in this landscape surrounded by the rising greensand hills. The intact historic buildings on the high street in Wonersh or the historic buildings that cluster around the green at Shamley Green contribute strongly to natural beauty and are accompanied by the ever- present backdrop of wooded greensand hills. This is a settled and sometimes busy landscape, but areas of tranquillity can be found on the elevated hills and within the ancient woodlands that impart a timeless and established feel.

#### Issues affecting the area's special qualities

The following issues are currently experienced in this area and are relevant to considering the difference AONB designation may make:

Pressure for housing development that does not respond to local vernacular styles, settlement form or visually intrudes into the landscape.
 Page 58

- Urbanisation of road routes through kerbing, signage, new junction arrangement and commercial development.
- Lack of management of field boundaries, ancient and veteran trees, coppiced woodland and sunken routes and former commons.

The special qualities associated with this landscape including the network of ancient woodland and former commons as well as watercourses and historic features could all benefit from the broader integrated management and protection that AONB designation would bring. This integrated management and the planning status of AONB designation could also address many of the issues noted above.

#### Other relevant factors

A particular issue in this area has been the inclusion/exclusion of settlement (Bramley and Chilworth) and the avoidance of a convoluted boundary. Given the size, extent and location of Bramley, it was judged preferable to exclude the settlement utilising the settlement boundary as defined in the Waverley Borough Local Plan. Where the settlement boundary did not follow a clear feature on the ground in the east of the village, the boundary was drawn out to the watercourse. In the case of Chilworth, consideration was also given to a boundary which excluded the settlement. However, the narrowness of the village, its relatively small scale and the strong visual connection to the wider landscape (even from the sports grounds and allotments to the west), meant that on balance the settlement was considered to form part of a wider sweep of qualifying land. Here a boundary was drawn further west to enable the qualifying land to extend up to the existing AONB boundary – this was judged to be preferable to a more convoluted boundary which created a very narrow corridor between two qualifying areas.



Wonersh High Street



View south from Chinthurst Hill

The transitional nature of the landscape to the south was highlighted in the natural beauty assessment. Care was taken to draw the boundary conservatively within this transition. The boundary includes land which is of high quality and where the surrounding greensand hills within the existing AONB contribute to the scenic qualities of the area. Where the greensand hills recede, the landscape is less undulating and the urban fringes of Little Mead, Cranleigh and Rowly exert an influence, land has been excluded. The boundary has adopted lanes, hedgerows and tracks through this area.

#### The proposed boundary

Two sections of proposed boundary has been drawn (in the northwest and in the south) to include the higher quality land between the existing AONB where strong visual links to the rising greensand hills contribute to the scenic quality. The boundary follows the meandering course of Cranleigh Waters in some locations. No boundary change has been made at Smithwood Common, despite the common extending both sides of the road. This is because the current boundary along the road is regarded as most robust and clear.

## **Proposed Hatchlands and East Clandon extension**

#### Context

This area comprises the lower slopes of the chalk dip slope extending to the designed parkland of Hatchlands and associated estate village of East Clandon. It is contiguous with the existing AONB, the Boundary of which does not follow a clear line on the ground and cuts across the farmed mid slopes.



View across pastures towards tree lined route of Blake's Lane

#### Extent to which the natural beauty criterion is met

The areas considered suitable for inclusion within the proposed extension include:

- The farmed slopes of the dip slope and historic route of Blake's Lane and small scale pastures.
- The estate village of East Clandon and its farmed setting.
- The Registered Park and Garden at Hatchlands.

#### **Significance**

This section of the dip slope and associated lower-lying clay landscapes which contain features of interest is significant for its rural character, historic buildings and designed landscape, which make a strong contribution to the natural beauty of the area. This area encapsulates an excellent example of a spring line village with an associated parkland both of which connect to the chalk dip slope historically and visually. From the parkland landscape there are views south beyond the park towards the wooded chalk ridge within the AONB. To the north and east the parkland is contained by ancient woodland while to the west is the estate village with its collection of knapped flint vernacular buildings and landmark church.

#### Key Issues affecting the area's special qualities

The following issues are currently experienced in this area and are relevant to considering the difference AONB designation may make:

- Urbanisation of the A286 corridor including duelling, signage and traffic management infrastructure.
- Ad hoc development and introduction of new individual dwellings in the countryside off Blake's Lane which are having a suburbanising influence Page 60

- Loss of field boundaries due to hedge removal, and subdivision of fields for equestrian uses.
- Introduction of new incongruous elements such as large-scale barns or uncharacteristic planting which can disrupt patterns and create eyesores.

Including these areas within the AONB would ensure more consistent forward planning and decision making through the focus provided by the statutory duties and powers which would apply. The dedicated purpose of the Surrey Hills AONB Management Plan and the assistance that the AONB team can provide in supporting land managers and others will help to resolve issues affecting the area as noted above.

#### Other relevant factors

The key issue affecting this section of boundary has been the existing AONB boundary which cuts across the open farmed mid slopes and does not follow a clear feature on the ground. In addressing this boundary anomaly consideration was given to the use of Blake's Lane and the A246 as a proposed boundary. A number of properties including some new development was noted along Blake's Lane. Consideration was given to the exclusion of this development but the rear boundaries to properties were often poorly defined. Furthermore, the small pasture fields and woodland between Blake's Lane and the A246 were considered to be of high quality and part of the sweep of landscape from the edge of the existing AONB. It was concluded therefore that the boundary should be extended as far as the A246. However, it was noted that the natural beauty assessment identified land within Hatchlands Park and East Clandon village as meeting the natural beauty criterion. In defining a boundary to include these features of interest on the edge, attention was given to the effect of the A246 corridor in fragmenting the landscape and the extent to which land north of the road qualified in terms of natural beauty. It was concluded that the extent of qualifying land north of the road was greater than the immediate features

of interest and was of considerable extent. Furthermore, the A246 corridor in this section was noted as being single carriageway and less influenced by urbanising elements such as duelling, lighting, signage and junctions which are seen further west and east. Taking all factors into account Natural England concluded that the land north of the A246 is of sufficient scale and quality to extend the AONB designation across the A246 corridor, and that the corridor itself has minimal impact on the sweep of landscape as whole. The boundary has therefore been drawn to include the lower dip slopes, East Clandon village, Hatchlands parkland and ancient woodland north of the park.



View towards mansion house at Hatchlands

#### The proposed boundary

The proposed boundary has been drawn to include the immediate setting of East Clandon village and rural landscape and ancient woodland north of Hatchlands. It follows the A246 and security fencing of the railway for significant sections through this area and also field boundaries, woodland, rural lanes and tracks. Land which slopes away from the parkland towards West Horsley and which is affected by development and land uses on the edge of the settlement is excluded. Similarly the Clandon Regis Golf Course to the west of East Clandon has been excluded due to changes to land use and landscape patterns which reduce natural beauty.

## **Proposed Headley Hills extension**

#### Context

This proposed extension includes the undulating pastoral and wooded landscape which surrounds the village of Headley. Located immediately north of Headley Heath and the existing AONB, this landscape shares many of the same characteristics and qualities including the ancient woodlands of Cherkley Wood, Nower Wood, Oyster Hill, Hook Wood and Costal Wood.



View east along Mill Way looking towards Headley village and Headley Heath

#### Extent to which the natural beauty criterion is met

The area includes:

- The historic village of Headley comprising knapped flint/brick buildings and landmark church.
- Significant areas of ancient woodland which combine with undulating topography to create unfolding views and vistas.
- An intimate landscape traversed by narrow, rural, winding lanes and tracks, lined with mature beech trees.

#### **Significance**

This area comprises undulating pastoral farmland with areas of ancient woodland and narrow lanes that impart an established feel and express many of the special qualities of the adjacent AONB. Its special qualities relate to its vegetation patterns and enclosed character which frame and reveal wider views across the folds in landform to wooded horizons. Vernacular buildings unified by the use of red brick and knapped flint, along with the landmark spire of Headley Church, combine with the sometimes steep topography to give high landscape and scenic quality. This is a small-scale landscape which has local visual complexity, and a tranquil character.

#### Key Issues affecting the area's special qualities

The following issues are currently experienced in this area and are relevant to considering the difference AONB designation may make:

- New housing development in the Headley Court area which may have a visual influence and impact on rural lanes.
- Coordination of woodland and access management across different conservation organisations.
- Scrub encroachment and non-native planting within woodland.
- Pressure for recreational use of the area including extension of golf courses and equestrian uses.

Statutory designation as AONB with the immediate application of relevant statutory powers and duties and its formal inclusion in the Surrey Hills AONB Management Plan would strengthen the ability of the AONB team to ensure the future conservation and enhancement of the area's natural beauty and would place a statutory duty on all public bodies to have regard to the area's conservation and enhancement.

#### Other relevant factors

The key issues which influenced the boundary in this area included those raised in the natural beauty and desirability assessment in relation to land north of the M25.

The natural beauty of Langley Vale to the north of the M25 was considered to be borderline, in part due to lack of strongly defined scenic qualities, and the significant noise intrusion from the M25 which reverberates within the vale due to prevailing wind and topography. In the south, land uses such as motor racing, subdivision of fields for equestrian use, signage, lighting, masts and pylons, result in cumulative effects of incongruous features. Further north the landscape is transitional as it extends towards Walton



View along bridleway north of Cherkley Wood

on the Hill and Epsom Racecourse. The definition of a boundary within this transitional landscape raised concerns regarding a boundary which was overly complex and convoluted. Furthermore, those areas of greatest quality fall under active management by the Woodland Trust as part of the establishment of a Commemorative Woodland. The qualities are likely to be conserved and enhanced through this initiative.

In relation to Banstead Heath the natural beauty was considered to be marginal in part due to the homogenous character of the area and lack of strongly defined scenic qualities. In addition, detailed assessment confirmed that traffic noise impacted on perceived tranquillity and relative wildness, as well as perceptions of scenic quality. Close to the M25, around Mogador, these effects were found to be particularly pronounced and coupled with adjoining land uses such as the Walton Heath golf course and open farmland towards Lower Kingston (areas not considered to meet the natural beauty criterion), gave rise to a more tenuous link to the existing AONB. Application of the 'wash-over' principle was considered for Walton Heath/ Lower Kingswood farmland but discounted on the basis that Walton Heath/Lower Kingswood farmland,

are not surrounded by qualifying land. Furthermore, the qualities of Banstead Common are under active management by the Banstead Common Conservators and likely to be conserved and enhanced through this active management.

On balance it was concluded that a pragmatic boundary along the southern edge of the M25 would enable the inclusion of areas of high quality around Headley, whilst excluding areas of lower quality to the north.

#### The proposed boundary

The proposed boundary provides an appropriate join with the existing Surrey Hills AONB boundary enabling all of the Mole Gap and Reigate Escarpment SSSI to be included within the designation.

In defining a boundary south of the M25 consideration was given to the current planning position at Headley Court which has outline planning permission for 70 homes. The emerging Mole Valley Local Plan also identifies this site and wider area, as a housing allocation (Policy DS40) for up to 120 homes, and the listed building of Headley Court is proposed for redevelopment as Senior Living Homes (currently at appeal). The former Ministry Of Defence (MOD) site is therefore likely to experience change and development in future. Taking these factors together a judgment was made to exclude the whole of the area from the proposed boundary. The boundary therefore follows rural lanes and property boundaries excluding Headley Manor House and associated grounds and setting. East of Headley village the boundary has been drawn along the top of the M25 embankments.

## **Proposed Chipstead extension**



View southwest across Chipstead Bottom towards Banstead Wood

#### Context

This area comprises the chalk valleys of Hogden Bottom and Chipstead Bottom including the undulating tributary valleys around Mugswell, Shabden Estate and Banstead Wood. This area extends northwards from the existing AONB towards the urban fringes of Kingswood and Chipstead.

#### Extent to which the natural beauty criterion is met

The extension includes:

- Distinctive steep sided, sinuous chalk valley landscapes of Hogden and Chipstead Bottoms.
- Extensive areas of ancient semi-natural woodland and open downland including Banstead Wood, Fames Rough, Chipstead Bottom and Shabden Park.
- Narrow sinuous rural lanes connecting rural cottages and estate buildings especially east of Mugswell and High Road/Elmore Road.

#### **Significance**

The area forms a series of steep sided chalk valleys and extensive areas of ancient semi-natural woodland and open downland valued for its grass swards and rare orchids, which collectively give rise to scenic landscape compositions. Here elevated open views contrast with the intimate enclosure of the ancient woods, carpeted in bluebells and wild garlic in spring. The scale of the valleys, matrix of open and wooded slopes and integrity of this area, exudes a deeply rural character where the dispersed pattern of historic rural buildings and narrow, tree lined lanes add interest.

#### Issues affecting the area's special qualities

The following issues are currently experienced in this area and are relevant to considering the difference AONB designation may make:

- Loss of hedgerows and woodland through the expansion of golf courses which intrude on to steep valley slopes.
- Ad hoc development along rural lanes which is visually intrusive in the wider landscape and has an urbanising effect on the character of rural lanes.
- Recreation pressure on areas of open downland including the impact of dogs on sheep grazing and ground nesting birds. Page 64

- Loss of chalk grassland to scrub invasion or over grazing through equestrian use.
- Fly tipping along rural lanes.
- Loss of woodlands which forms wooded skylines and prevents visual intrusion of areas of adjacent development.

The special qualities associated with this area could all benefit from the broader integrated management and protection that AONB designation would bring. This integrated management and the planning status of AONB designation could also address many of the issues noted above.

#### Other relevant factors

During the assessment process concerns were raised regarding the transitional landscape to the south and west where it abuts Lower Kingswood and the A217 and M25 junction. Here the combination of gentler topography, built development along lanes, urban fringe land uses such as pony paddocks, fly tipping and noise intrusion from the road corridors, results in a decline in natural beauty. The proposed boundary has therefore been drawn within this transition including areas of land where topographic variation is more pronounced and combined with rural lanes, vernacular buildings and patchwork of pasture fields and woodland, gives rise to higher levels of natural beauty. Consideration was given to drawing the boundary back as far as Rectory Road where the landform is clearly dropping into Hogden Bottom and where the network of narrow lanes and vernacular buildings is most concentrated. However, this would have resulted in the exclusion of significant blocks of ancient woodland to the south (Grub Wood, Gatwick Wood and Colts Bushes). The boundary was therefore extended further south to include these features of interest on the edge which contribute to the natural beauty of the area, whilst still ensuring the boundary falls within the area of transition. A further area of transition occurs between High Road and Hogcross Lane. Consideration was given to defining the boundary along High



Grub Wood

Road, but this would have resulted in the exclusion of a number of important listed buildings which form part of the Elmore Road and High Road Conservation Areas and which contribute to natural beauty of the area. On balance the boundary was drawn further to the east in order to include historic buildings of interest and a small valley between High Road, Elmore Road and Hogcross Lane.

At Chipstead Bottom particular scrutiny was given to the relatively recent suburban housing which has occurred along Outwood Lane south of the railway, noted in the natural beauty assessment as not contributing to natural beauty. A boundary excluding this development would have resulted in a narrow corridor of excluded land and a convoluted boundary. The housing is relatively limited in extent, lies on lower land within the valley and is dominated by surrounding rolling landform. It was concluded that the housing sits within a sweep of qualifying land and has only a localised impact. A boundary was therefore drawn to the west, thereby including the housing within the proposed extension.

#### The proposed boundary

The boundary follows lanes, tracks, hedgerows and the edges of woodland for much of its length through this area. It does not follow any feature on the ground in two locations - on the margins of the Kingswood Golf and Country Club and northeast of Surrey Downs Golf Club. In these locations the boundary cuts across the break in slope in a straight line between areas of woodland.

## **Proposed Happy Valley extension**

#### Context

This area comprises the deeply incised Happy Valley, a chalk valley system which extends into the fringes of south London, to the east of the A23. It is contiguous with the existing AONB and is defined by the main break in slope between the valley sides and wider built-up areas.



View across the downland slopes and wooded ridgelines of Happy Valley

#### Extent to which the natural beauty criterion is met

The area considered suitable for inclusion within the proposed extension includes:

- The dramatic chalk valley system of Happy Valley and surrounding farmland.
- Network of ancient woodland and wooded shaws that create a patchwork across areas of downland and arable farmland.
- Extensive areas of nationally significant calcareous grassland habitat.
- Narrow rural lanes and tracts of land only accessible on foot.

#### **Significance**

Chalk grassland landscapes are an important component of the Surrey Hills AONB. The AONB as currently designated includes significant areas of chalk grassland on the steep scarp slopes but little land within the incised valleys of the North Downs.

This area, along with Marden Park and Stoney Hill to the east, encapsulates some of the best chalk grasslands north of the existing AONB. Special qualities are derived from the scale and drama of the valley and its areas of chalk grassland and ancient woodland which create scenic compositions and unfolding views. This landscape has smooth, rounded convex slopes emphasised by linear woodland shaws and expresses a range of colours and textures throughout the seasons. The water tower of Netherne-on-the-Hill and Chaldon church punctuate the skyline and add interest reflecting the history of the area. This landscape abuts areas of significant population, but retains a high degree of tranquillity, especially in the heart of area which can only be accessed on foot.

#### Key Issues affecting the area's special qualities

The following issues are currently experienced in this area and are relevant to considering the difference AONB designation may make:

- High public usage of this area resulting in compaction of chalk grassland and conflict between livestock grazing and dogs.
- Loss of field boundaries due to hedge removal, lack of management or over-trimming and limited take up of environmental stewardship in sorpeaces 66

- Introduction of incongruous elements such as large-scale agricultural buildings or masts which can disrupt patterns and create eyesores.
- Suburbanisation of lanes due to high traffic volumes and verge erosion.
- Expansion of urban fringe land uses including golf courses and playing fields.

Including this area within the AONB would ensure more consistent forward planning and decision making through the focus provided by the statutory duties and powers which would apply. The dedicated purpose of the Surrey Hills AONB Management Plan and the assistance that the AONB team can provide in supporting land managers and others will help to resolve issues affecting the area as noted above.

#### Other relevant factors

During the natural beauty assessment, concerns were raised regarding the transitional nature of the landscape to the south, where it abuts the AONB. Between Lord's Wood, Court Farm and Rook Lane, a less undulating and intensive arable landscape, with evidence of boundary loss and caravan development within Furzefield Wood, was considered to be of lower landscape quality. However, in the context of the wider extension area, these lower quality areas fall between qualifying land within the AONB to the south and the Happy Valley to the north and were considered to be localised. On balance these areas were regarded as sufficiently small in extent to be considered as part of a wider tract of qualifying land.

The extent of urban fringe land uses such as playing fields, visual influence of urban areas on the qualities of the landscape, and the extent to which incongruous features such as masts fragment the area, were also key considerations. The strong topography and high levels of vegetation on the fringes of Happy Valley and along urban edges has enabled the boundary to be defined close to the built edge and as a result it often follows fence lines along the perimeter of properties and is subsequently convoluted in some places. At Farthing Down consideration was given to the drawing back of the boundary to exclude transitional landscape influenced by the surrounding urban development. This would have resulted in almost all of the





Upper reaches of the Happy Valley east of Furzefield Wood

Chaldon Church

down being excluded due to a lack of clear features to follow on the ground. Given the ridge of downland is valued for its scenic views into Happy Valley, natural heritage (part of the Site of Special Scientific Interest and National Nature Reserve) and cultural heritage (Scheduled Monument), a pragmatic decision was taken to extend the boundary to the urban edge. This enabled the feature to be included in its entirety.

#### The proposed boundary

The county boundary across the southern section of Happy Valley has been used as the proposed boundary, in the absence of a clear feature to follow and the need to exclude land to the south which is increasingly influenced by urban context and includes the Surrey National Golf Course. The proposed boundary does not include the whole of the Farthing Downs and Happy Valley SSSI nor the South London Downs NNR - this is not unusual where natural heritage designations cover significant areas. The natural beauty of the landscape for inclusion in the AONB designation is the primary consideration.

## **Proposed Caterham Woods extension**

#### Context

This boundary extension includes the steep folded wooded chalk slopes which lie between the chalk scarp at Gravelly Hill (within the existing AONB) and the settlement of Caterham. It also includes ancient woodland and historic defence sites on the edge of the chalk scarp south of Chaldon.



Carpets of wild garlic in Old Park Wood

#### Extent to which the natural beauty criterion is met

The area includes:

- Dramatic, steep and folded chalk slopes.
- Extensive areas of woodland including ancient woodland sites (e.g. Old Park Wood) and woodland which frames and defines the chalk scarp to the south.
- Arts and Crafts housing and historic sites which contribute to natural beauty.

#### **Significance**

This proposed extension is unique within the context of the chalk valleys to the north of the Surrey Hills AONB forming some of the steepest and most dramatic chalk slopes and extensive areas of woodland. Special qualities relate to the drama and scale of the topography, elevated and glimpsed views across woodled slopes, extensive areas of intact semi-natural habitat close to built-up areas and historic features which add interest and contribute to the natural beauty of the area. This is an inward-looking landscape but one which seamlessly connects to the existing AONB to the south.

#### Key Issues affecting the area's special qualities

The following issues are currently experienced in this area and are relevant to considering the difference AONB designation may make:

- Loss of chalk grassland sites due to establishment of secondary woodland and scrub.
- Lack of woodland management resulting in a loss of structural diversity and biodiversity.
- Potential loss of heritage including Whitehill Tower and the integrity of Arts and Crafts housing.
- Extension of garden curtilage and domestic clutter into woodland resulting in loss of semi natural character through gradual urbanisation.

The inclusion of the Caterham Woods provides an important connection between existing communities to the north and the chalk scarp to the south. This area is integral to the wider North Downs Way and Page 68

acts as a green corridor maintaining strong east-west continuity. The inclusion of this area helps to widen the AONB landscape at one of its narrowest points. Designation would support continuity in the active management of woodland enhancing biodiversity along with calcareous grassland restoration supporting Biodiversity Opportunity Area initiatives including connecting existing SSSI and SNCI sites e.g. Quarry Hangers, currently managed by Surrey Wildlife Trust.

#### Other relevant factors

The definition of a boundary to include the steep wooded slopes to the south of Caterham has been particularly challenging due to the nature of the wooded/urban interface and the risk of the boundary becoming overly convoluted. Where the landscape drops northwards towards the settlement of Caterham, care has been taken to include the steepest wooded or open slopes where the folded nature of the topography is strongly expressed and there are features of interest including ancient woodland, whilst avoiding the splitting of settlement. Tandridge Local Plan was consulted to determine the extent of urban areas and Caterham Conservation Area. The proposed boundary does not include any of these built-up areas. Nevertheless, the proposed boundary extension does include some areas of built development associated with the Arts and Crafts housing along Weald Way and Woodland Way (part of the War Coppice Garden Village). These areas have been included due to their low density and local distinctiveness with contributes to the area's natural beauty. It also includes the Mottrams/ Caterham Preparatory School and loose development along Harestone Hill as this built form is set within established grounds and wooded hillsides and is subservient to the surrounding landscape.

In terms of the boundary at Chaldon the landscape was considered to be in transition, becoming influenced by the presence of the urban edge and pony paddocks south of the village. Whilst the pattern of development is relatively low density, the urbanising effects of built form, property boundaries combined with post and rail fencing, horse shelters and storage, has created a degree of visual clutter. On balance Natural England has concluded that this area does not meet the natural beauty criterion and the location of the existing AONB is judged to be correct (save for a number of boundary anomalies). Only minor changes were made to the boundary here.

#### The proposed boundary

The proposed boundary provides an appropriate join with the existing Surrey Hills AONB boundary and includes the qualifying higher quality wooded slopes above Caterham whilst excluding the lesser quality equestrian land uses on the south side of Chaldon.

The boundary follows lanes, tracks and the edge of properties and woodland. Given the heavily wooded and settled fringes of this area, not all sections of the boundary have been possible to verify in the field. Where access has not been possible aerial photographs and OS MasterMap have been used to assist with identifying a suitable boundary feature to follow. The use of property boundaries in many instances means that the boundary is complex in some locations. This is judged to be acceptable in order to bring in qualifying areas of extensive dramatic chalk topography and areas of ancient woodland.



Whitehill Tower - a non-designated heritage asset at Tower Farm

The boundary includes areas of ancient woodland and Sites of Nature Conservation Importance (including Foxburrow Fields and The Valley) on the margins of the area. It also enables the inclusion of Whitehill Tower, a local landmark and the whole of the large multivalent hillfort at War Coppice Camp (scheduled monument) to be included within the AONB in its entirety.

## **Proposed Woldingham Valleys extension**



Smooth dramatic slopes of the North Downs east of Woldingham

#### **Context**

This area comprises the dramatic, smooth and flowing slopes of the North Downs which extend seamlessly from the existing AONB located to the south and west. It includes the ridge top settlement of Woldingham, Nore Hill and the Halliloo Valley.

#### Extent to which the natural beauty criterion is met

The extension includes:

- Smooth, flowing dramatic chalk topography creating a series of sinuous valley systems.
- Mosaic of ancient woodland and shaws emphasise topography and combine with areas of chalk grassland and arable farmland create scenic compositions.
- Garden village settlement of Woldingham sits on a ridge top and extends down valley sides set within mature woodland and leafy grounds.

#### **Significance**

This area contains some of the most intact and dramatic North Downs chalk valley landscapes. Views across valley slopes and along the sinuous valleys, combined with woodland and contrasting open slopes creates a range of scenic compositions and visual interest which exude drama. The scale of the landscape means that land uses such as golf courses remain subservient set within a high quality and visually dominant landscape. Similarly the village of Woldingham reads as part of this wider valley system having little influence on views from the wider landscape due to high tree cover and its loose arrangement of dwellings enabling many views out from the settlement to the surrounding hillsides. This area offers tranquil rural countryside with noise intrusion from roads increasing at its fringes to the north and east.

#### Issues affecting the area's special qualities

The following issues are currently experienced in this area and are relevant to considering the difference AONB designation may make:

- Visual intrusion of masts which break the skyline and sinuous flow of landform.
- Impact of road noise and loss of tranquillity on the margins of the area due to traffic noise.
- Introduction of non-native woodland and poplar plantations disrupting traditional landscape patterns.
- Loss of chalk downland and grassland diversity due to lack of management and scrub encroachment.
- Land use change such as intensive arable farming and expansion of golf courses resulting in disruption to landscape patterns.
- Loss of woodlands/trees which frame views and integrate existing development.

Page 70

The semi-natural woodlands and chalk grassland habitats, within this proposed extension could benefit from the broader integrated management and protection that AONB designation would bring. This integrated management and the planning status of AONB designation could also address many of the issues noted above.

#### Other relevant factors

The definition of the boundary in relation to Woldingham has been a key issue. Initially consideration was given to defining a boundary which excluded the settlement. The Tandridge Local Plan was referenced to determine the extent of the settlement however this was found to exclude built-up areas along The Ridge and on the edges of the Halliloo Valley. If a boundary was to be defined which excluded development within Woldingham then it would also need to exclude development in these locations too. Defining a boundary to achieve this was found to be problematic given the leafy character of the area and permeable edges to development. It was also likely to become convoluted if Halliloo Valley was to be included. The merits of including Woldingham within the extension was therefore considered further. The natural beauty assessment highlighted that the settlement does not detract from the surrounding landscape as a result of its mature wooded context – this means that only glimpses of individual housing can be seen from the wider valley sides. Furthermore, within the village the individual rural character of the narrow privately maintained and unlit streets, loose arrangement of dwellings (many of which are of architectural merit) set within generous leafy grounds and the Conservation Area all contribute to its distinctive sense of place. From within the village there are frequent elevated views out towards the surrounding high-quality landscape such that the surrounding landscape is perceived to extend into and through the settlement. These qualities are reflected in



Sinuous Halliloo Valley looking east across the Woldingham Golf Course within valley bottom

the village design guide and Conservation Area Appraisal.

On balance, and for the reasons given above, Natural England has concluded that the settlement of Woldingham should be included within the proposed boundary. This enables a less convoluted boundary to be defined which includes the Halliloo Valley, Nore Hill and Woldingham Valley up to Botley Hill Farm. On the southern and eastern sides of the village it enables the inclusion of the north downs undulating chalk landscape which extends seamlessly from the existing AONB.

Within the Halliloo valley particular attention has been given to the transitional nature of the valley and influence of equestrian uses and fragmentation as a result of roads and railway in its western reaches. A boundary has been drawn within this transition, including the higher quality areas.

#### The proposed boundary

The proposed boundary follows a long section of road (Limpsfield Road) on the eastern side of this area which forms a robust and easily identifiable boundary. To the north the boundary follows the edge of woodland and property boundaries, lanes and tracks. The boundary includes the Woldingham and Oxted Downs SSSI in its entirety.

## **Proposed Limpsfield extension**



Stockenden Farm with the rising land of the greensand hills behind

#### Context

This area comprises a mosaic of woodland, acid grassland and remnant heath habitat south of Limpsfield and is associated with former commons of Limpsfield and Itchingwood. It connects the greensand hills where they extend west from the Kent Downs AONB with the former commons south of Limpsfield. This area lies immediately to the east of Oxted.

#### Extent to which the natural beauty criterion is met

The area includes:

- Undulating and steep slopes of the greensand hills where they extend from the Kent Downs supporting a high concentration of ancient woodland shaws and historic settlement.
- Mosaic of woodland, acid grassland and remnant heath habitat displaying colour and textural variation throughout the seasons and high biodiversity value.

#### **Significance**

This proposed extension is a relatively small scale and intimate landscape, with a richly textured and colourful mosaic of small-scale medieval field patterns, woodland shaws, former common and remnant heath. The sometimes steep and complex topography of the greensand hills afford occasional longer distance views southwards which add to scenic quality, along with historic farmsteads and manor houses which form local focal points. Whilst this is a settled landscape, it is one in which tranquillity and connection to nature can easily be found.

#### Key Issues affecting the area's special qualities

The following issues are currently experienced in this area and are relevant to considering the difference AONB designation may make:

- Urbanisation of rural lanes due to ad hoc development and intensification of areas of existing development.
- Pressure for recreation development including golf courses and playing fields.
- Road and rail improvements such as widening, lighting and signage which can impact on tranquillity and rural character.
- Ash dieback in woodlands and loss of heath habitat due to fragmentation.
- Recreational pressures due to the proximity of conurbations.

Statutory designation as AONB with the immediate application of relevant statutory powers and duties and its formal inclusion in the Surrey Hills AONB Management Plan would strengthen the ability of the AONB team to ensure the future conservation and enhancement of the area's natural beauty and would place a statutory duty on all public bodies to have regard to the area's conservation and enhancement.

# Other relevant factors

The fragmentation of the landscape in the north of the area as a result of development and land use such as the Limpsfield Chart golf course was noted in the natural beauty assessment. As a result, the Limpsfield Common area was not included in the Candidate Area although highlighted for particular scrutiny when defining the boundary. This was revisited and initially a boundary was defined along Kent Hatch Road and rural tracks including Pastens Road to exclude this area. However, after careful consideration this boundary was considered to make little sense on the ground, including development set within woodland in some areas whilst excluding it in others. The quality and character of woodland and heathland associated with Limpsfield Common and The Chart was also considered to be similar to that within the existing AONB and whilst containing areas of development, areas of semi-natural habitat were nonetheless perceived as dominant. In particular Limpsfield Chart golf course was considered to be limited in extent and influence and built development was either relatively loose in arrangement (Ballards Lane), nestled within woodland (Pains Hill), and/or limited in extent (The Chart). Given the mosaic of semi-natural habitats and their contribution to the special qualities of the area as a whole, Natural England has on balance concluded that the area of Limpsfield Common warrants inclusion within the proposed extension. Areas of small-scale development were considered to form part of a wider tract of qualifying land.

In terms of defining the southern boundary, consideration was given to the transitional nature of the landscape where the steep and convoluted slopes of the greensand hills gradually reduce and flow into the Low Weald. A boundary was identified within the transition enabling the steepest slopes and historic settlement to be included, along with wooded shaws and Itchingwood Common. The boundary adopts rural lanes within the transition wherever possible.





Mature beech trees

Remnant heath habitat

# The proposed boundary

The proposed boundary provides an appropriate join with the existing Surrey Hills and Kent Downs AONB boundaries and includes the qualifying higher quality land and woodland associated with the greensand hills and areas of former common and woodland/remnant heath. A boundary line has been identified at the higher end of the transition and follows continuous clear ground features. After careful consideration Natural England has concluded that the boundary should not be taken further south into the Low Weald farmland. Whilst the Low Weald has many positive attributes and forms attractive countryside it was not considered to express the outstanding qualities required for recognition as a nationally important landscape.

# **Proposed Godstone Hills extension**



The Mount - motte and bailey castle earthwork north of Old Oxted

### **Context**

This area comprises the Greensand Hills to the east and south of Godstone and stretches from South Park in the southwest to Oxted in the northeast. It comprises an area of undulating wooded landscape which affords close proximity views to the chalk scarp and elevated views south across the Low Weald. These greensand hills share many of the characteristics of the Surrey Hills AONB but on a smaller scale.

# Extent to which the natural beauty criterion is met

The extension includes:

- The upper greensand vale northwest of Oxted.
- Main spine of greensand hills between Tandridge and South Park including important areas of ancient woodland, historic defensive sites and incised rural lanes.
- Fringes of Low Weald landscape which lie adjacent to the hills.
- Areas of remnant parkland including Tandridge Park and South Park.
- Minor watercourses such as Gibbs Brook and water bodies such as Townland Pond/Godstone Ponds support valued wetland habitats and form important wildlife corridors.

### **Significance**

The significance of this area derives from its distinctive undulating topography across which is a diverse, interconnected mosaic of deciduous woodlands including shaws, fields, farmsteads and parklands. These hills comprise a sequence of low summits which are visually connected to the dramatic chalk scarp to the north and afford views southwards across the Low Weald farmland.

# Issues affecting the area's special qualities

The following issues are currently experienced in this area and are relevant to considering the difference AONB designation may make:

- The fragmentation of the landscape due to transport infrastructure and land use change.
- Heritage at risk due to lack of management and maintenance.
- Restoration of former minerals sites in keeping with the special qualities of the area.
- Land use change in areas beyond the proposed boundary extension which can affect the special qualities of the area and valued views between the chalk escarpment and greensand hills.

- Lack of active traditional woodland management.
- Loss of woodlands, ancient and veteran trees and parkland boundary features which perform an important role in framing views and reinforcing parkland character.

The extensive ancient semi-natural woodlands and habitats, streams and narrow incised lanes within this proposed extension could all benefit from the broader integrated management and protection that AONB designation would bring. This integrated management and the planning status of AONB designation could also address many of the issues noted above.

### Other relevant factors

The natural beauty assessment identified a number of issues affecting land to the northeast of Godstone. Natural beauty was met at the upper end of the vale, but declines towards Godstone due to noise impact from traffic (M25, A25 and A22), road junctions, lighting and signage, current land uses including Godstone golf club, Highways England compound and, garden centre (Nags Hall), Rooks Nest business park and oil well site, and disused workings at Coney Hill Sandpit. A boundary has therefore been sought to include the qualifying land at the head of the vale connecting it across to the chalk scarp to the north, whilst excluding land between the existing AONB boundary and the A25, and between the edge of Tyler's Green and Tandridgehill Lane. Although change is anticipated in the excluded area which may bring future enhancement (restoration of Palmers Wood oil field to woodland by 2025 and restoration of the Highways England compound site, albeit for possible use within the Godstone golf course), this area will nonetheless continue to be fragmented.

The natural beauty assessment identified land to the south of the greensand hills as transitional and the boundary assessment work noted significant noise intrusion to the east of the M23 due to topography and prevailing winds. In accordance with Natural England guidance the boundary has been defined conservatively within these areas of transition. The boundary is therefore drawn to the east away from the M23 and is located north of the railway, except in the area around South Park, where it is extended to



View south along the incised route of Coldharbour Lane



Church at South Park

include the more undulating and well wooded landscape associated with former parkland and built heritage features, which contribute to natural beauty. Care was taken to exclude the planning allocation at Lambs Business Park – this site is a former brick clay quarry allocated for waste development in the Surrey Waste Local Plan.

# The proposed boundary

The boundary follows roads, lanes, hedgerows and the edge of woodland and excludes the settlements of Old Oxted, Oxted, Tandridge, Tyler's Green and Godstone, White Post and Bletchingley. It does include the village of Church Town which is small in scale and sits within a sweep of qualifying land. In defining a boundary around settlement edges consideration was given to the influence exerted by the urban edge, urban fringe land uses and current allocations and planning permissions. Where potential development sites have been identified as part of the emerging Local Plan they have been noted but have not been afforded significant weight.

Page 75

# Proposed Betchworth Hills and Mole Valley extension



Views north across the former parkland along the River Mole floodplain with the rising chalk scarp in the distance

### Context

This area comprises the greensand hills to the west of Reigate and the Mole Valley where it flows between the hills and the chalk scarp within the existing AONB to the north. It stretches from the fringes of Brockham in the west to the fringes of Reigate in the East.

# Extent to which the natural beauty criterion is met

The areas considered suitable for inclusion within the proposed extension include:

- Reigate Heath with its acidic vegetation, valued semi-natural habitat and elevated views.
- The Mole Valley floodplain and adjacent parkland landscapes associated with Betchworth, Wonham and Broom Park.
- Historic settlements of Betchworth and Buckland.

# **Significance**

The special quality of this area derives from the combination of undulating hills, River Mole valley floor and superb views towards the dramatic chalk scarp to the north and west. These qualities have supported the establishment of parklands which have taken advantage of the scenic qualities, and historic settlements and key landmark buildings which add a rich layer of cultural significance. The underlying sandstone geology is reflected in the topography, heath habitat and incised lanes. Reigate Heath contains extensive areas of lowland dry acid grassland and lowland heathland which are rare within the context of the Surrey Hills AONB as well as extensive areas of good quality semi-improved grassland along the River Mole and marshy meadows which are rare in Surrey.

# Key Issues affecting the area's special qualities

The following issues are currently experienced in this area and are relevant to considering the difference AONB designation may make:

- Land use change in areas beyond the proposed boundary extension which may affect the special qualities of the area and valued views between the chalk escarpment and greensand hills.
- Linear development along the A25 corridor resulting in cumulative urbanising effects and fragmentation of the landscape
- Loss of woodlands, ancient and veteran trees and parkland features which perform an important role
  in framing views and reinforcing parkland classes.

- Introduction of new incongruous elements such as large-scale buildings or inappropriate planting which can disrupt patterns and create eyesores.
- Potential for future minerals extraction.

The area is closely linked (in visual, natural and cultural heritage terms) with the adjacent chalk scarp which already lies within the AONB. Natural England considers that strategic management of this area as a whole would be beneficial. Including these areas within the AONB would ensure more consistent forward planning and decision making through the focus provided by the statutory duties and powers which would apply. The dedicated purpose of the Surrey Hills AONB Management Plan and the assistance that the AONB team can provide in supporting land managers and others will help to resolve issues affecting the area as noted above.

### Other relevant factors

Particular scrutiny has been given to the transitional nature of the landscape to the south and west. Here the greensand hills are declining in elevation giving way to an open and flatter agricultural landscape which lacks the scenic qualities of the parkland landscapes along the River Mole and close proximity views to the chalk scarp to the north. The boundary was extended to the south to include the rising slopes of the greensand hills where they define the River Mole corridor around Ricebridge Farm and where there are strong signs of former parkland and intact enclosure patterns. The boundary includes qualifying land at the higher end of the transition, excluding areas of flatter open farmland to the south and west.

Detailed assessment at the boundary stage revealed that the elevated woodland of Reigate Park was separated from the wider area of qualifying land by a lower lying area. Here the landscape has been influenced by urban fringe land uses (including allotments and sports pitches), as well equestrian uses



Elevated views northeast across parkland and pastoral slopes from Oldpark Wood

around Littleton Lane. This has resulted in a decline in landscape quality and condition such that the elevated woodland of Reigate Park has become isolated. Furthermore, its northern boundary was difficult to define - woodland extending as a feathered edge into the Reigate Priory Playing Fields and around Reigate Pond. On balance a judgment was made to exclude this area and a boundary was defined further to the west.

Detailed consideration was also given to the inclusion of Buckland Park Lake. The natural beauty assessment concluded this area did not meet the natural beauty criterion but was finely balanced. This was reviewed. There is a clear distinction between the qualities of Buckland Park Lake and other former mineral sites to the north of the A25. This, coupled with the location of the site adjacent to qualifying land to the north, west and south, has led to the conclusion that a less convoluted boundary could be defined to the east along the Shag Brook, resulting in the inclusion of the lake as part of a tract of qualifying land.

### The proposed boundary

The boundary follows roads, tracks, hedgerows and the edge of fields as well as a section of the River Mole and its tributary Gad Brook. It has excluded areas of development along the A25 corridor including the waste recovery facility at Reigate Road Quarry whilst including the settlements of Betchworth and Buckland.

# **Proposed Ockley Low Weald extension**



Historic farmhouse at Plough Farm

### Context

This area comprises land between the railway and the fringes of Ewhurst and a smaller area west of Ewhurst. The former stretches to the south to include Vann Lake, Ockley village and Jayes Park and the small-scale pastoral landscape to the southwest of Forest Green. It includes the historic settlements of Ockley (including Ockley Court) and Forest Green as well as a large number of traditional farmhouses.

## Extent to which the natural beauty criterion is met

The area includes:

- A mosaic of mixed farmland and woodland which extends from the existing AONB forming a rich tapestry of small fields backdropped by Leith Hills and Holmbury Hill.
- Nature Reserves at Vann Lake and Sayers Croft including areas of steep wooded ghylls and open water.
- Historic settlements of Ockley, Ockley Court and Forest Green as well as a high concentration of vernacular farmsteads connected by rural lanes and tracks.

# **Significance**

This proposed extension is a gently undulating pastoral landscape comprising small scale fields, species rich meadows, ancient woodlands (including linear shaws) where close proximity views to the rising greensand hills to the north lift scenic quality. It is a settled landscape with a high concentration of traditional rural farm buildings connected by a series of minor lanes and tracks which form a grid of greenways. Water is an important component of this landscape including incised ghyll valleys cloaked in woodland and numerous water bodies including those at Forest Green and Vann Lake. This landscape has a tranquil and long-established feel and reflects the important land management connections between the Low Weald and Greensand Hills.

# Key Issues affecting the area's special qualities

The following issues are currently experienced in this area and are relevant to considering the difference AONB designation may make:

- Decline in coppiced woodland due to lack of management.
- Suburban development along lanes altering settlement pattern and rural routes.
- Equestrian land uses and intensive arable cultivation both of which cause the loss of landscape patterns and a decline in landscape condition.

Page 78

- Loss of species rich meadows due to lack of management.
- Introduction of non-native and invasive species along watercourse and in ancient woodlands.

Statutory designation as AONB with the immediate application of relevant statutory powers and duties and its formal inclusion in the Surrey Hills AONB Management Plan would strengthen the ability of the AONB team to ensure the future conservation and enhancement of the area's natural beauty and would place a statutory duty on all public bodies to have regard to the area's conservation and enhancement.

### Other relevant factors

A key issue in defining the extent of this area has been the transitional nature of the landscape as it moves away from the greensand hills. Careful consideration has been given to those factors which are judged to lift the qualities of this landscape above ordinary or attractive countryside. Land close to the AONB is most influenced by the presence of the rising hills at Leith Hill and Holmbury Hill which are seen as a backdrop in views. Small knolls of higher land create topographic variation and interest and steep wooded ravines also add variety and texture. The intact pattern of small-scale pastures, defined by thick hedgerows and





Vann Lake Nature Reserve

View across Jayes Park to Leith Hill

linear woodlands, adds a sense of longevity, along with vernacular farm buildings. Where these factors come together, the natural beauty of the landscape is considered to be high. On this basis the boundary has been defined conservatively within this transitional landscape and extends south to include: distinctive small knolls from which there are elevated views e.g. Mayes Court; areas of intact meadow southwest of Forest Green; parkland landscape at Jayes Park; and historic settlements which contribute to the scenic qualities. Where the land flattens out, becoming less topographically interesting and lacks wider views, or has undergone change as a result of management which affects landscape condition (e.g. intensive farming, equestrian uses or golf course), it has been excluded. The east west historic lanes and tracks which traverse this landscape have frequently been used as suitable boundary features.

In accordance with Natural England Guidance, features of interest on the edge have been included where they form part of a wider area of qualifying land. However, some features of interest such as Vann Lake Site of Special Scientific Interest (SSSI), cover a significant area - in this case woodland extends south into land on the margins of the transition. After careful consideration Natural England has concluded that the proposed boundary includes the SSSI where it is also a nature reserve and where the landscape is most scenic due to varied topography, steep wooded ravines and ghylls as well as the open water of the lake. The boundary therefore excludes some of the SSSI woodland to the south. Similarly ancient woodland to the south of Sayers Croft Nature Reserve has not been included within the proposed boundary -including only the nature reserve and associated meadows. This is not unusual where natural heritage designations cover significant areas. The natural beauty of the landscape for inclusion in the AONB designation is the primary consideration.

### The proposed boundary

The proposed boundary follows roads, lanes and tracks, and occasional hedgerows and the edge of woodland. In the west it follows Coneyhurst Gill. The boundary around Sayers Croft was particularly difficult to define and is therefore complex. Natural England has concluded this is acceptable in order to bring the nature reserve and adjacent meado points the other contracts of the contract of the c

# **Proposed Dunsfold Low Weald extension**



View north across Dunsfold Pond to the greensand hills

### Context

This area comprises the Low Weald landscape which surrounds the village of Dunsfold to the south of Hascombe Hill and Breakneck Hill and to the east of Vann Lane. It includes the small incised tributary streams of the River Lox which weave through this small scale pastoral farmland in the shadow of the greensand hills.

# Extent to which the natural beauty criterion is met

The extension includes:

- The historic common edge settlement of Dunsfold.
- Undulating pastoral farmland comprising small, incised streams, extensive blocks of woodland, and small scale pastoral fields with strong visual links to the greensand hills.
- Narrow rural lanes flanked by hedgerows and mature trees and occasional traditional farm buildings with sequential framed views to the hills.

# **Significance**

The area forms a small scale, undulating, pastoral landscape which has a settled and established character, cloaked in ancient woodland and traversed by narrow lanes flanked by hedges and mature trees. This part of the Low Weald affords close proximity framed views to the rising hills to the north, across the undulating landform. These scenic qualities are complemented by the intimacy of the incised wooded ghylls which support significant populations of mosses and liverwort. There is a strong local vernacular of red brick, hanging tiles and pantile roofs which provide visual unity and interest, and the area has a high tranquillity with a rural backwater quality.

# Issues affecting the area's special qualities

The following issues are currently experienced in this area and are relevant to considering the difference AONB designation may make:

- Erosion of rural lanes due to increased traffic and curtilage treatment associated with new and existing development including the loss of hedgerows and grass verges, close board fencing and gated access.
- Loss of tranquillity due to increased levels of activity and development in adjacent areas including increased night lighting.
- Lack of woodland management, including traditional coppicing and historical replanting of ancient woodland with mixed or conifer plantation.
   Page 80

- Loss of unimproved or semi-improved pastures due to conversion to anable or grazing regimes.
- Introduction of non-native and invasive species along ghyll streams.
- Erosion of vernacular styles and integrity due to expansion/redevelopment of farms and farmhouses including large scale modern barns.

The special qualities associated with this proposed extension could all benefit from the broader integrated management and protection that AONB designation would bring. This integrated management and the planning status of AONB designation could also address many of the issues noted above.

### Other relevant factors

During the assessment process concerns were raised regarding the transition in landscape quality away from the rising greensand hills and existing AONB boundary, and also the effects of fragmentation related to linear development along Plaistow Road and Chiddingfold Road and expansion of farm or commercial activity resulting in close board fencing and larger scale buildings considered to be incongruous. Careful consideration was given to the need to define a clear boundary such as the northern side of Chiddingfold Lane (which would include some areas of development), with the need to exclude incongruous development on the edge, adopting a more complex boundary to the north, which follows the edge of woodland and a stream course. On balance, Natural England has concluded that the boundary exclude incongruous development on the edge and that a more





Traditional vernacular buildings on edge of Dunsfold

Incised ghylls lined with ferns and woodland

complex boundary, but nonetheless one which can be defined on the ground, is preferable. This ensures that land to be included in the proposed extension comprises high quality landscape with strong visual association to the wider greensand hills.

Consideration was also given to recent planning permission for an exploration into a hydrocarbon exploration site, off High Loxley Lane, and also the proposed Garden Village development at Dunsford Aerodrome, both of which lie close to the qualifying area. The boundary was drawn to the west of these developments but also west of New Pond Farm, excluding the large barns and development as well as areas of equestrian use. These areas were considered to be of lesser quality as a result of fragmentation and management, but also due to less distinctive typography and few wider views.

### The proposed boundary

Care was given to the boundary along High Loxley Road in light of the access proposals for the approved hydrocarbon exploration site to the east. The boundary was located to the west of the lane, excluding it from the proposed extension where it is likely to be affected by the development. However south of the proposed access the boundary crosses to the east of the lane, including it within the proposed extension.

# **Proposed Dockenfield Hills extension**



View across pastoral landscape at Old Lane

### **Context**

This area includes an area of undulating pastoral farmland between the existing Surrey Hills AONB and the South Downs National Park, south of Rowledge.

# Extent to which the natural beauty criterion is met

The proposed extension includes:

- Areas of ancient woodland and high concentration of mature hedgerow and trees and veteran trees associated with former parkland at Frensham Heights.
- The rural villages of Dockenfield and Spreakley and a dispersed pattern of vernacular farmhouses and oast houses connected by a network of small rural lanes.
- The east west tributaries of the River Wey which flow through defined valleys and contribute to the varied topography.

### **Significance**

The special qualities of this landscape relate to its tranquil and rural backwater ambience. This is reinforced by the established character of ancient woods, the pattern of well managed hedgerows and majestic oaks, and rural winding lanes which impart an established character. In this landscape settlements nestle in the gentle folds of the landscape and higher ridges afford long distance views.

# Key Issues affecting the area's special qualities

The following issues are currently experienced in this area and are relevant to considering the difference AONB designation may make:

- Loss of woodland through lack of management and loss of historic management techniques such as coppicing leading to a loss of hazel coppice stools along lanes.
- Establishment of recreational land uses which can impact on landscape quality such as glamping.
- Loss of field boundaries due to hedge removal, lack of management or over-trimming and limited take up of environmental stewardship in some areas.
- Large scale individual dwellings which may be visually prominent or alter lane character through curtilage treatment and introduction of gate baccess 82

■ Suburbanisation of lanes including changes to hedgerows relating to property boundary treatment.

Including this area within the AONB would ensure more consistent forward planning and decision making through the focus provided by the statutory duties and powers which would apply. The dedicated purpose of the Surrey Hills AONB Management Plan and the assistance that the AONB team can provide in supporting land managers and others will help to resolve issues affecting the area as noted above.

### Other relevant factors

During the natural beauty assessment, concerns were raised regarding the peri-urban influences associated with the edge of Rowledge, and schools in extensive grounds, where the landscape is considered to be transitional. This especially affected land north of West End Lane where there is also evidence of equestrian uses, which have visually disrupted landscape patterns. These issues were revisited at the boundary setting stage. Frensham Heights School (whilst containing significant built form) sits within an area of woodland and steep slopes which form the valley sides of the River Wey tributary. The school is also located within the former grounds of Frensham Hill, and signs of former parkland, including park railing and veteran trees set within pasture, are still evident. On this basis it was concluded that the boundary should be drawn further to the north, along The Long Road, including the school, its grounds and woodland, within the proposed extension. Further east, the

landscape was considered to be more significantly influenced by development along lanes and equestrian uses. This area was excluded, along with the settlement of Shortfield Common, and the boundary was again defined using local lanes.

### The proposed boundary

In defining the boundary to the south consideration was given to the inclusion of land south of Old Lane. Whilst land beyond the



View southeast across oast house at Pitt Farm

County boundary and into Hampshire has many similar qualities, there are also influences from Frith End Quarry and equestrian uses at Gum Hill. It was therefore concluded reasonable to pull the boundary northwards. Consideration was given to the use of the County boundary as the proposed boundary to the extension area, however this was found to not follow a clear feature on the ground, in part because it followed the River Wey, the course of which had changed over time and due to field boundary loss. The proposed boundary was therefore pulled northwards to Old Road, which forms a clear line on the ground within the transition.

The boundary excludes the settlement of Rowledge and Shortfield Common on the margins of the qualifying area, where the landscape shows signs of fragmentation and is transitional.

Shortheath Common is a Site of Nature Conservation Importance (SNCI) on the margins of the proposed extension area. Consideration was given to including it in its entirety, as a feature on the edge. However, the common is fragmented by roads and the northern section, north of West End Lane, is more closely associated with the settlement edge. On balance a simple boundary was defined along West End Lane, excluding a small part of the SNCI, but including the majority of the common within the proposed extension.

# **Proposed Minor Boundary Refinements**

Minor boundary changes are also proposed where there are known anomalies with the existing AONB boundary. These anomalies were highlighted in the Areas of Search around Haslemere, through the call for evidence and during the natural beauty assessment. Minor changes have been made where the existing AONB boundary does not follow a clear feature on the ground, where the land in question relates strongly to the wider AONB forming part of a sweep of qualifying land, and where a suitable alternative boundary can be defined.

Minor changes have been made in the following locations:

### Guildford

The Mount Land South of Woodcote

### Milford

Land Southwest of Sandy Lane

### Catteshall

Land at Munstead Heath Land at Scizdons and Squirrels' Hill

### **Bookham**

Land South of the A246

### Oxted

Land North of Park Road

### Dorking

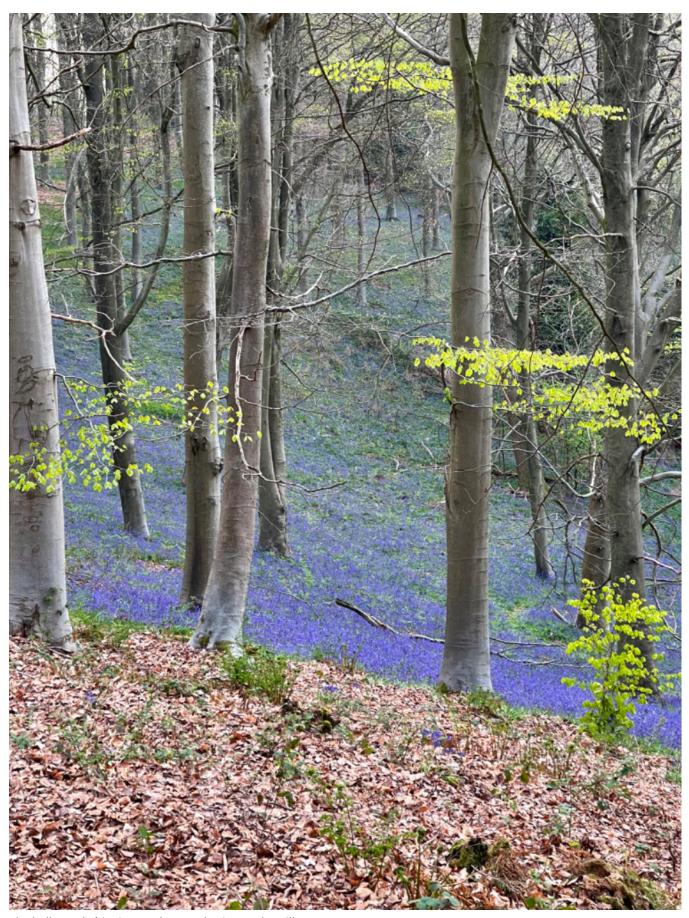
Land north of Punchbowl Lane Land Northwest of Dorking

### Haslemere

Land East of Strut Road Land South of Grayswood Common Woodland along Railway Land Between Bunch Lane and Weydown Road Land West of Farnham Lane Land South of Polecat Land North of Critchmere Hill

### Grayshott

Land at Tyndalls Wood Land North of Linkside North and Eight Acres



Bluebell woods fringing Eastbury Park, Binscombe Hills area

# The area proposed for designation as part of the Surrey Hills AONB

The ultimate decision to extend the Surrey Hills AONB is not taken on the basis of the individual Extension Areas set out above in their own right, but rather on the total area of the proposed designation. Natural England must stand back and consider the area as a whole to satisfy itself whether it is desirable to designate the qualifying areas as part of the Surrey Hills AONB.

Together, the proposed extension areas are closely related to the existing Surrey Hills AONB, forming largely contiguous land which shares the same geology as the wider AONB, comprising greensand hills and sinuous rolling chalk valleys as well as lower lying wooded wealden clays. These extension areas reflect qualities found elsewhere within the AONB and are thus representative of the existing designated landscape.



Remnant Wey & Arun Canal at Run Common, Cranleigh Waters area

Collectively the Extension Areas, in association with the existing AONB, comprises outstanding wooded hills, valleys and lowland farmland. The area has special qualities which are rare in the national context and for which a local consensus regarding the value of much of this landscape has existed for many years. In addition, the relative national rarity of the area's heath, chalk and ancient woodland habitats adds further weight to this conclusion.

The special qualities of the area proposed for designation as a whole, its national significance and the pressures impacting on the specific qualities of each Extension Area, are such that the legislative provisions provided by the Countryside and Rights of Way Act 2000, combined with the particular focus given to these qualities in planning management, the application of specific integrated management initiatives and increased access to a broader range of specialist skills and Page 86

other resources, make the inclusion of these areas within the Surrey Hills AONB desirable. This is particularly important with regard to the issues noted above in relation to each of the areas and particularly threats of loss of habitats including chalk grassland and woodland, visual intrusion from major development and heavy recreational use.

Designation would provide a more robust and defensible recognition of the special qualities of qualifying areas of the Area of Great Landscape Value (AGLV). Conservation and enhancement of the natural beauty would be possible via direct engagement in management activity and through influencing the work of other organisations with responsibility for activities relevant to the area. This would be particularly important should the AGLV designation be removed in future.

In addition the area would benefit from the specific additional planning protection in the National Planning Policy Framework relating to AONBs. Designation would also extend the duty to have regard to the statutory purpose of the AONB to the many authorities whose responsibilities encompass the Extension Areas such as the local authorities, the Environment Agency, Natural England and the utilities companies.

Including the proposed extension within the Surrey Hills AONB would ensure a more consistent approach to this nationally important landscape in accessing resources, forward planning and decision making and through the focus provided by the statutory duties and powers which would apply, and in particular through the delivery of the statutory AONB Management Plan and its associated action plans.

Natural England has concluded that the area proposed for designation as indicated on maps accompanying this consultation document has outstanding natural beauty and that it is desirable that it should form part of the AONB and that the proposed new boundary should be subject to statutory and public consultation.

# What happens next?

Natural England is required by the Countryside and Rights of Way (CRoW) Act, 2000, to consult the County and District Councils affected by the proposed boundary variations. In addition, this consultation is being extended to allow everyone with an interest in the proposed extensions to comment on the proposals. At the end of the consultation, we will analyse all the responses and review the proposals and if necessary, amend them to take account of any further relevant evidence provided. Depending on the number of responses received this is likely to take around six months. If no fundamental objections arise which cannot be overcome, and assuming no additional land needs to be included as a result of the consultation, the next stage will be to draw up a draft Order and to publish Notice of the Order in the London Gazette and other papers as required by Section 83(2) of the CRoW Act.

The Notice period allows anyone who wishes to do so to make representations to Natural England, objecting to, supportive of, or proposing amendments to the Order, and stating the grounds on which they are made.

If however, as a result of the statutory and public consultation, additional land needs to be included within the proposed boundary variation, an additional statutory consultation will be required in relation to this additional land only.

Following the Notice period, a further period of response analysis will be required, and any further consequent changes made to the draft legal Order. It is worth noting that during the last landscape designation project over 3,500 responses were received, so it is difficult to provide a time estimate for this at this stage. Natural England Board approval will then be sought to allow the Order to be 'made' and submitted to the Secretary of State for confirmation. If there are any unresolved objections, these will be submitted to the Secretary of State with the Order, who has discretion to call a Public Inquiry to consider such objections further, before deciding whether or not to confirm the Order.

Page 87

The Secretary of State may or may not confirm the Order, with or without amendment. This decision is not made to any specific timescale.

# Implications of designation

Designation as AONB would provide formal statutory recognition of the national importance of the natural beauty of the area concerned, and as a consequence, would provide the basis for a more coordinated and integrated approach to management which would give specific focus and priority to the natural beauty of the area. The proposed area, if designated, would then formally come within the ambit of the statutory AONB Management Plan and benefit from the incentives, powers, duties, responsibilities and resources that designation brings.

The benefits can be summarised as follows:

- Statutory application of the Surrey Hills AONB Management Plan across the proposed area including much of the Area of Great Landscape Value (AGLV) and other areas of wider countryside regarded as meeting the natural beauty criterion.
- Full access to the AONB Team and the specialist skills and advice they can offer, providing an integrated focus on conserving and enhancing the area's special qualities through partnership working.
- Formal inclusion of Croydon Borough Council/Greater London Authority on the AONB Board through the inclusion of land at Happy Valley, such that the powers and duty 'to have regard' to the AONB purpose would extend to Croydon Borough Council/Greater London Authority in this area.
- All public bodies, statutory undertakers and holders of public office would have a statutory duty to have regard to the conservation and enhancement of the area brought within AONB.



Front cover image: Looking west along Old Road, Dockenfield

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ISBN 978-1-78367-391-9

Catalogue Code: NE803

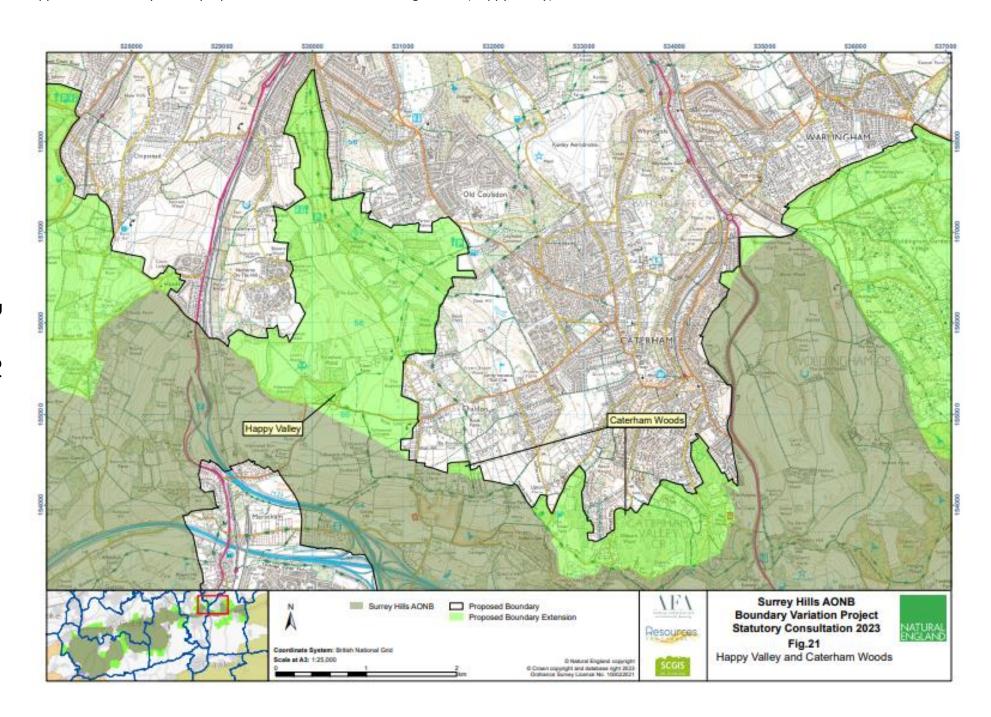
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Committee(s):	Dated:
Epping Forest and Commons Committee – For decision	18/05/2023
Epping Forest and Commons Committee For decision	10/00/2020
<b>Subject:</b> The Commons: Farthing Downs Land Registry	Public
mapping anomaly adjustment	
Which outcomes in the City Corporation's Corporate	10/12
Plan does this proposal aim to impact directly?	
Does this proposal require extra revenue and/or	Υ
capital spending?	
If so, how much?	£500 est
What is the source of Funding?	
Has this Funding Source been agreed with the	Y (Local risk)
Chamberlain's Department?	
Report of: Juliemma McLoughlin, Executive Director,	For Decision/
Environment Department	
Report author: Geoff Sinclair, Assistant Director The	
Commons	

# **Summary**

The City Corporation's landholding at Farthing Downs, part of the Coulsdon Commons Charity (number 232989), was registered with the Land Registry in 2011. The London Borough of Croydon have approached the City Corporation to say that they consider the City's registered landholding includes land they acquired in 1925. Local staff also share this opinion and have worked with staff from the LBC over many years in joint arrangements involving the land concerned. It is proposed that a Land Registry application or transfer be undertaken to restore the boundary situation to reflect the locally understood situation.

# Recommendation(s)

# Members are asked to:

 Agree that a Land Registry application is made to restore the boundary of the City Corporation's registered title to Farthing Downs to reflect the locally understood boundaries, or alternatively that a Transfer of the relevant strip of land is made by the City Corporation back to the London Borough of Croydon for nil consideration to achieve the same effect.

# Main Report

# Background

- 1. In 2011 the City Corporation completed a project to register the landholdings of the Open Spaces Charities with the Land Registry Office. Farthing Downs is one of four land areas that comprise the Coulsdon Commons Charity (number 232989) and whose boundary was registered at this time.
- 2. The general boundary shown on the Land Registry map SGL722967 (Appendix One), and edged in red, shows the eastern side to have a clearly defined boundary with neighbouring residential properties.

# **Current Position**

- 3. On 13<sup>th</sup> Jan 2023 the London Borough of Croydon (LBC) approached the City Corporation and advised they considered the Land Registry map for a 1-mile section along the eastern site boundary to be inaccurate. The LBC claim there is a section of land between the residential boundary and a public right of way (Footpath number 73) internal to the site which they acquired on the 22<sup>nd</sup> Sept 1925 and for which they hold copies of the deeds and maps relating to the purchase. This land had not been registered by them.
- 4. City Corporation staff managing the site have always understood the land was the responsibility of the LBC and have worked closely with their Countryside staff on its management.
- 5. The mapping of the land concerned in 2011 showing it to be owned by the City Corporation appears to misrepresent the actual boundary as locally understood by City Corporation and LBC staff. The land concerned is shown on the map in Appendix Two and represents an area of around 0.15ha.
- 6. Footpath 73 is an attractive green lane through mature to ancient yews. It is however on a steep slope with many mature Ash trees in the process of decline from ash dieback and which will pose a significant tree safety liability. The boundaries with the residential properties are also complex and in varying condition.

# **Options**

7. Option 1: To maintain the Land Registry as it is mapped and unchanged. This has potential to risk a legal challenge from the LBC, however, LBC officers have said that 'we could look at options for it to remain registered with the City under the current title, and transfer ownership to yourselves'. There does not appear to be any level of threat to the land that would impact our landholding through the City Corporation not owning it and the nature of the land brings with it significant liabilities that will be costly to respond to. This is not recommended.

8. Option 2: To reregister the boundary so that it reflects the boundary as understood by the LBC and local City Corporation staff. This will recognise the locally understood situation and would also mean that any assumed liability for the significant tree safety and boundary concerns would be avoided. As a Land Registration error rather than transferring any legal title there are believed to be no charity implications to be considered. Staff time and some finance will be required to resolve the mapping anomaly which LBC have indicated they could progress. **This option is recommended.** 

# **Proposals**

- 9. Since its acquisition of Farthing Downs local staff have always understood there was a narrow strip of land with an unmarked boundary along the eastern edge of the site. The land concerned was registered by the City Corporation in 2011 however this situation was not recognised by local staff who continued operating as if it was not owned by the City Corporation.
- 10. The proposal would allow for the boundary to be remapped and a Land Registry application made (or, if required, a Land Registry transfer effected) to correct the boundary to the title of the City's land to reflect the boundary as understood by both the LBC and local City Corporation staff.

# **Key Data**

11. A land area of 0.15ha would be transferred to the ownership of LBC

# **Corporate & Strategic Implications**

Strategic implications

12. None

Financial implications

13. None

Resource implications

14. An estimated two staff days are likely to be required to undertake the Land Registry transfer. This would involve officers from the City Surveyors and Natural Environment Divisions. Some legal costs and Land Registry Fees will also be incurred by the Comptroller and City Solicitor in making the necessary Land Registry application and/or (if needed) effecting a Land Registry transfer. This is estimated to cost £500 and LBC have indicated they will meet these costs

# Legal implications

16. The correction of the title boundary of the City's land (or alternatively, registration of a transfer of the strip of registered land in question to achieve the same effect) is a legal process managed by the Land Registry and will require both the LBC and the City Corporation to provide evidence in support of the change. It will be the responsibility of LBC to secure registration of title to its own land.

# Risk implications

17. None if the land is transferred back to the LBC

# **Charity Implications**

- 18. Coulsdon Commons is a registered charity (232989). 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.
- 19. It is considered that the Land Registry application (or alternatively, corrective land transfer) being in response to correcting a Land Registration error rather than transferring any legal title there are no charity implications to be considered.

Equalities implications

20. None

Climate implications

21. None

Security implications

22. None

### Conclusion

- 15. Farthing Downs Common was registered with Land Registry in 2011. An anomaly in the Land Registry boundary was identified in 2023 where a narrow strip of land was included in the City Corporation's landholding and which following representation by the LBC should be shown to belong to them.
- 16. It is proposed that the boundary be re mapped and a Land Registry application be made (or alternatively a transfer be effected to achieve the same effect) to restore the boundary situation to the agreed limits.

# **Appendix**

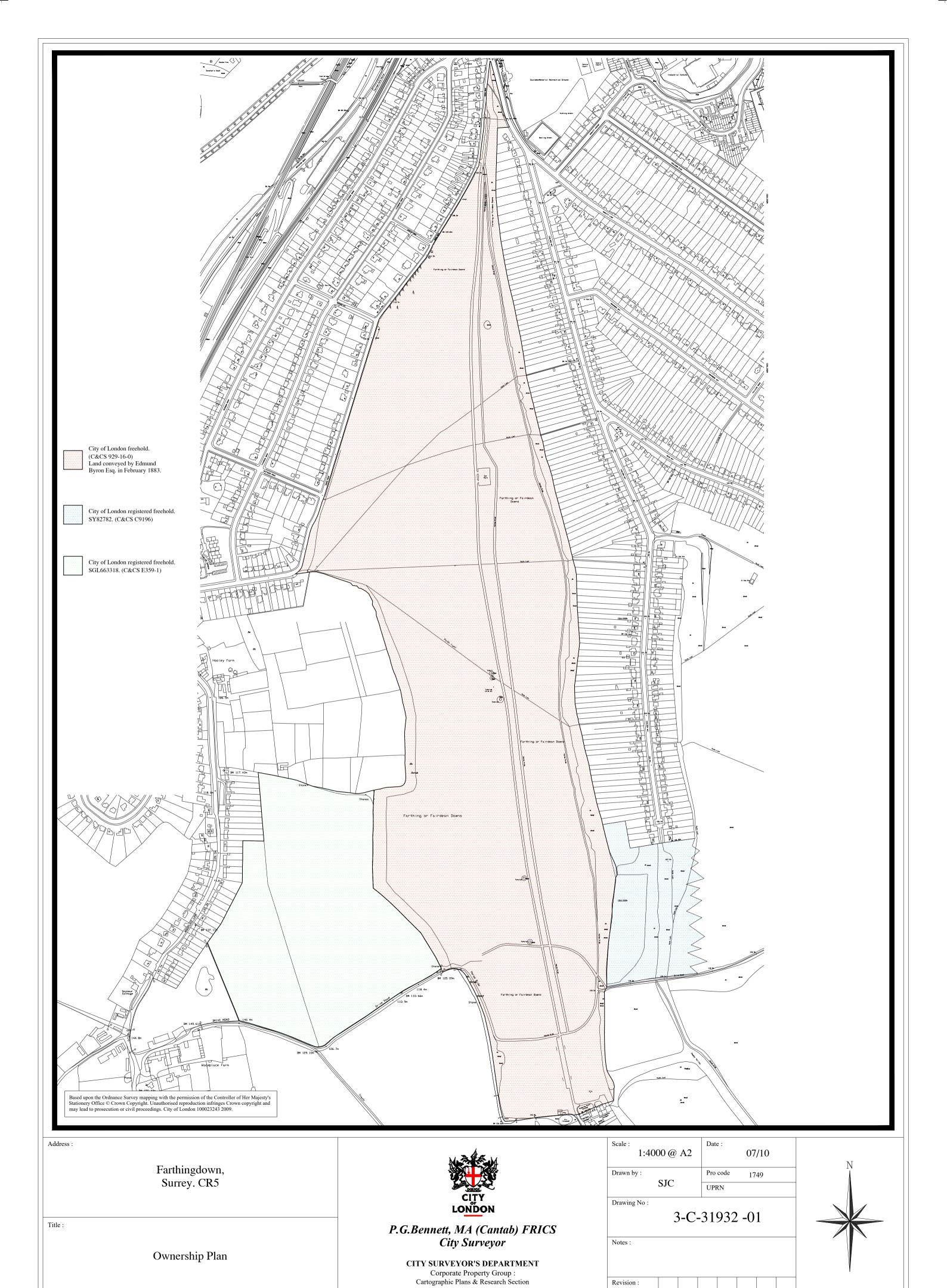
Appendix 1 – Farthing Downs Common Land Registry map
Appendix 2 – Farthing Downs Common: Land Registry Mapping anomaly.

# **Geoff Sinclair**

Assistant Director The Commons

T: 01753 647358

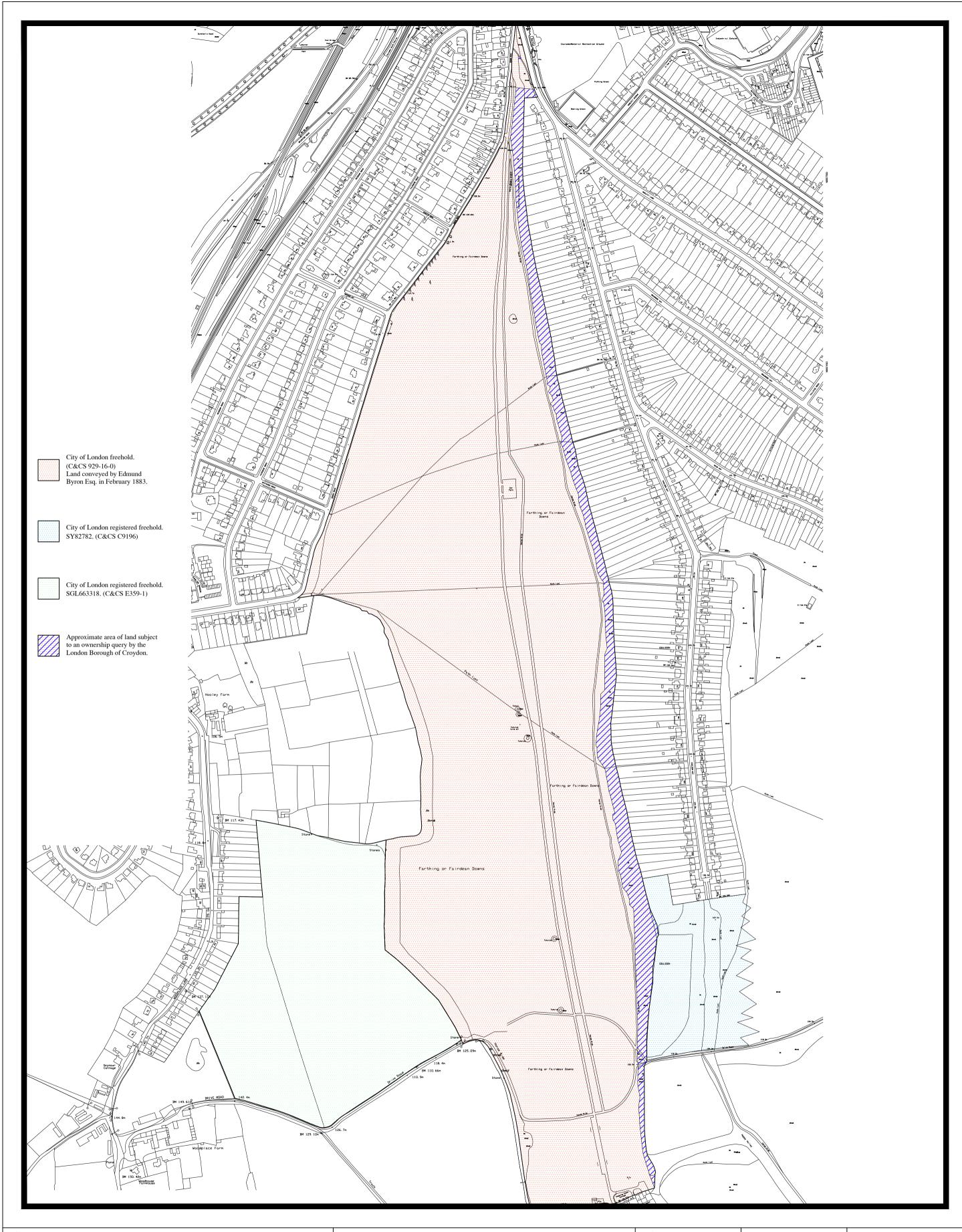
E: geoff.sinclair@cityoflondon.gov.uk



Page 97

Revision:





Address:

Farthingdown, Surrey. CR5

Title:

Ownership Plan



P.G. Wilkinson BSc MSc MRICS City Surveyor

CITY SURVEYOR'S DEPARTMENT Corporate Property Group : Plans & Records Section

Scale:	Date :
1:4000 @ A2	02/23
Drawn by :	Pro code
JAB	UPRN

Drawing No:

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# Agenda Item 14

Committee(s)	Dated:
Epping Forest and Commons Committee	18 May 2023
Subject:	Public
Risk Management Update Report	
Which outcomes in the City Corporation's Corporate	1, 5, 12
Plan does this proposal aim to impact directly?	
Does this proposal require extra revenue and/or	No
capital spending?	
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the	N/A
Chamberlain's Department?	
Report of:	For decision
Juliemma McLoughlin, Executive Director Environment	
Report author:	
Joanne Hill, Business Planning and Compliance Manager	

# Summary

This report is presented to provide the Epping Forest and Commons Committee with assurance that risk management procedures in place within the Environment Department are satisfactory and that they meet the requirements of the Corporate Risk Management Framework and the Charities Act 2011. Risks are reviewed regularly within the Department as part of the ongoing management of the operations. It is also reviewed regularly by the management teams at Epping Forest and The Commons.

Your Committee is responsible for five Registered Charities: Epping Forest (charity number 232990), Ashtead Common (charity number 1051510), Burnham Beeches (charity number 232987), Coulsdon and Other Commons (charity number 232989) and West Wickham and Spring Park (charity number 232988). In accordance with the Charity Commission's Statement of Recommended Practice (SORP), Trustees are required to confirm in the charity's annual report that any major risks to which the charity is exposed have been identified and reviewed and that systems are established to mitigate those risks. Using the Corporate Risk Register guidance, the management of these risks meets the requirements of the Charity Commission.

Each of the five charities holds a risk register which is summarised in the main body of this report and included in full within the appendices.

The Natural Environment Cross-Divisional Risk Register includes risks which are managed by the Natural Environment Director at a higher, strategic, level. The Cross-Divisional risks are summarised in this report and the summary risk register is provided at Appendix 7.

### Recommendation

The risks faced by the charities have been reviewed. Members are asked to consider, and if agreed to confirm, on behalf of the City Corporation as Trustee, whether the registers appended to this report satisfactorily set out the key risks to each of the charities and that appropriate systems are in place to identify and mitigate risks.

# **Main Report**

# Background

- The City of London's Risk Management Strategy, which forms part of its Corporate Risk Management Framework, requires each Chief Officer to report regularly to Committees on the risks faced by their department.
- 2. The Charity Commission requires Trustees to confirm in a charity's annual report that any major risks to which the charity is exposed have been identified and reviewed and that systems are established to mitigate those risks. These risks are to be reviewed annually.
- Each Committee to which the Natural Environment Division of the Environment Department reports receives an update on the risks relevant to the Committee every quarter. Detailed risk registers will be presented to Committees every six months. The two interim quarterly reports will include summary risk registers, with individual risks being reported in detail by exception.
- 4. The Executive Director Environment assures your Committee that all risks held by the Natural Environment Division continue to be managed in compliance with the Corporate Risk Management Framework and the Charities Act 2011.
- 5. Each of the five charities for which your Committee is responsible holds a risk register specific to its site or sites. All risks are regularly reviewed by management teams, in consultation with risk owners, with updates recorded in the corporate risk management information system (Pentana). Risks are assessed on a likelihood-impact basis, and the resultant score is associated with a traffic light colour. For reference, the City of London's Risk Matrix is provided at Appendix 1.
- 6. The detailed risk registers for Epping Forest and each of the four Commons charities are summarised in the main body of this report and provided in full at appendices 2 to 6. For each risk, officers across the Division are undertaking a range of actions to mitigate the effects at their own sites.
- 7. The Natural Environment Director maintains oversight of all risks and holds a Cross-Divisional Risk Register containing risks which are common to most or all sites: individual charities hold their own specific risks on these matters, and

the Cross-Divisional risk consolidates them for oversight by the Director. This register also contains risks related to specific projects which are managed by the Director at a strategic level. The Cross-Divisional risks are summarised in this report, with the summary risk register included at Appendix 7. The detailed register is presented to the Open Spaces and City Gardens Committee for decision on a regular basis.

### **Current Position**

# **Epping Forest Risks**

- 8. The Epping Forest Risk Register is provided at Appendix 2. The register contains seven RED and eight AMBER risks owned and managed by the Assistant Director, Epping Forest and his Management Team.
- 9. In addition, the Director owns the Wanstead Park Reservoirs (RED) risk which is managed jointly with the City's Building Control Service.
  - ENV-NE 007: Wanstead Park Reservoirs (RED, 24)
  - ENV-NE-EF 017: Tree failure (RED, 32)
  - ENV-NE-EF 004: Decline in condition of assets (RED, 24)
  - ENV-NE-EF 006: Raised reservoirs (RED, 24)
  - ENV-NE-EF 008: Invasive non-native species (RED, 16)
  - ENV-NE-EF 012: Loss of forest land and buffer land/or concession of prescriptive rights (RED, 16)
  - ENV-NE-EF 013: Loss of knowledge in skilled staff/difficulties in recruitment (RED, 16)
  - ENV-NE-EF 015: Public behaviour (RED, 16)
  - **ENV-NE-EF 003**: Health and safety incidents/catastrophic health and safety failure (AMBER, 12)
  - ENV-NE-EF 007: Pathogens (AMBER, 12)
  - ENV-NE-EF 010: Development consents close to forest land (AMBER, 12)
  - ENV-NE-EF 016: Financial management and loss of income (AMBER, 12)
  - ENV-NE-EF 005: Declining Site of Special Scientific Interest (SSSI)/Special Area of Conservation (SAC) condition (AMBER, 8)
  - ENV-NE-EF 009: Severe weather events (AMBER, 8)
  - ENV-NE-EF 011: Wanstead Park Heritage at Risk Register (AMBER, 8)
  - ENV-NE-EF 014: Major incident resulting in prolonged 'access denial' (AMBER, 8)
- 10. Since the risk register was last presented to your Committee, one new risk has been added: 'ENV-NE-EF 017: Tree failure'. There are large numbers of older, more vulnerable trees throughout Epping Forest which require regular inspection and works to prevent failure. A rise in tree disease combined with extreme weather conditions due to climate change exacerbate the risk and there are currently insufficient staff resources to complete all necessary works. Robust actions are in place to manage the risk, including regular

inspections of trees and prioritisation of works; and an effective Severe Weather Protocol which is implemented in the event of large storms/high winds.

- 11. This risk has been scored at the maximum level of likelihood and impact (Red, 32 likely / extreme) due to a single Poplar tree identified as dangerous close to the M25 and beneath high voltage power cables. The tree is due to be felled by a third party in May 2023. Following this, the risk score will be reassessed and reduced if appropriate.
- 12. Tree-related health and safety risk was previously included within 'ENV-NE-EF 003: Health and safety incidents/catastrophic health and safety failure'. As it has now transferred to the new tree failure risk, the current score of ENV-NE-EF 003 has decreased to AMBER, 12 (possible / major) and the risk and actions have been updated accordingly.

### The Commons Risks

A separate risk register is held for each of the four Commons charities to enable effective site-specific management and assessment.

13. Since the date of the last report to your Committee, a new risk has been added to the register of each charity to address the risk associated with potential industrial action by the emergency services. A range of mitigating actions are in place to control this risk should the situation occur. For example, contingency plans would be implemented, and high-risk activities suspended.

## **Ashtead Common**

- 14. The Ashtead Common Risk Register contains five AMBER and two GREEN risks as shown below. The detailed register is presented at Appendix 3.
  - ENV-NE-AC 004: Local planning issues (AMBER 8)
  - **ENV-NE-AC 009:** Maintenance of buildings and other structures (AMBER, 8)
  - ENV-NE-AC 005: Tree diseases and other pests (AMBER, 6)
  - **ENV-NE-AC 006**: Climate and weather (AMBER, 6)
  - ENV-NE-AC 008: Water pollution (AMBER, 6)
  - ENV-NE-AC 001: Budget reduction and income loss (GREEN, 4)
  - ENV-NE-AC 010: Industrial action by emergency services (GREEN, 3)
- 15. The 'Local planning issues' risk (**ENV-NE-AC 004**) risk has recently been reassessed and the current score increased from Green 3 (possible/minor) to Amber 8 (likely/serious). This is because Epsom and Ewell Council have begun consultation on a new Local Plan that could see significant residential development in the vicinity of Ashtead Common. Locally, there are limited resources to engage with this process. The situation will be kept under review and the risk updated accordingly.

### **Burnham Beeches and Stoke Common**

- 16. The Burnham Beeches and Stoke Common Risk Register contains four RED, four AMBER and one GREEN risk. The detailed register is presented at Appendix 4.
  - ENV-NE-BBSC 002: Damage to sites (RED, 16)
  - ENV-NE-BBSC 005: Tree diseases and other pests (RED, 16)
  - ENV-NE-BBSC 007: Rural Payment Agency Grants (RED, 16)
  - **ENV-NE-BBSC 009:** Maintenance of buildings and other structures (RED, 16)
  - ENV-NE-BBSC 001: Budget reduction and income loss (AMBER, 12)
  - ENV-NE-BBSC 004: Local planning issues (AMBER, 12)
  - ENV-NE-BBSC 006: Climate and weather (AMBER, 12)
  - ENV-NE-BBSC 008: Pollution (AMBER, 8)
  - ENV-NE-BBSC 011: Industrial action by emergency services (GREEN, 3)

### **Coulsdon and Other Commons**

- 17. The Coulsdon and Other Commons Risk Register contains one RED, six AMBER and one GREEN risk. The detailed register is presented at Appendix 5.
  - **ENV-NE-COC 009:** Maintenance of buildings and other structures (RED, 16)
  - ENV-NE-COC 002: Damage to sites (AMBER, 12)
  - ENV-NE-COC 004: Local planning issues (AMBER, 8)
  - ENV-NE-COC 005: Tree diseases and other pests (AMBER, 8)
  - ENV-NE-COC 008: Pollution (AMBER, 8)
  - ENV-NE-COC 001: Budget reduction and income loss (AMBER, 6)
  - ENV-NE-COC 006: Climate and weather (AMBER, 6)
  - ENV-NE-COC 011: Industrial action by emergency services (GREEN, 3)

### **West Wickham and Spring Park**

- 18. The Wickham and Spring Park Risk Register contains one RED, five AMBER and one GREEN risk. The detailed register is presented at Appendix 6.
  - ENV-NE-WWSP 009: Maintenance of buildings and other structures (RED, 16)
  - ENV-NE-WWSP 002: Damage to sites (AMBER, 12)
  - ENV-NE-WWSP 004: Local planning issues (AMBER, 8)
  - ENV-NE-WWSP 005: Tree diseases and other pests (AMBER, 8)
  - ENV-NE-WWSP 001: Budget reduction and income loss (AMBER, 6)
  - ENV-NE-WWSP 006: Climate and weather (AMBER, 6)
  - ENV-NE-WWSP 010: Industrial action by emergency services (GREEN, 3)

### **Natural Environment Cross-Divisional Risks**

- 19. The Cross-Divisional Risk Register of the Natural Environment Division contains top-level risks, such as those on specific projects. Other risks on the register are those which are common to most or all sites: individual charities hold their own specific risks on these matters, and the Cross-Divisional risk consolidates them for oversight by the Director.
- 20. The Cross-Divisional risks are currently owned by the Executive Director Environment who has reviewed them in collaboration with the Natural Environment Senior Leadership Team. Ownership of these risks will be transferred to the new Natural Environment Director when they join the organisation in May 2023.
- 21. The Open Spaces and City Gardens Committee regularly receives a detailed report on the nine Cross-Divisional risks summarised below (the Summary Risk Register is provided at Appendix 7 for information).
  - ENV-NE 003: Operational Property: Repair and maintenance of buildings and structural assets (RED, 24)
  - ENV-NE 001: Health and Safety (RED, 24)
  - ENV-NE 007: Wanstead Park Reservoirs (RED, 24)
  - ENV-NE 004: Pests and diseases (RED, 16)
  - ENV-NE 002: Extreme weather and climate change (AMBER, 12)
  - ENV-NE 005: Impact of development (AMBER, 12)
  - **ENV-NE 011:** Recruitment and retention of staff (AMBER, 12)
  - ENV-NE 010: Budget pressures (AMBER, 8)
  - ENV-NE 009: Failure to implement the Charity Review (AMBER, 6)
- 22. As the Wanstead Park Reservoirs risk (ENV-NE 007) is specifically relevant to your Committee, it is included in detail in the Epping Forest Risk Register at Appendix 2. This risk is managed jointly with the City's Building Control Service. A detailed report on the project was presented to your Committee in January 2023.

# **Risk Management Process**

- Across the Environment Department, risk management is a standing agenda item at the regular meetings of local, divisional and departmental management teams.
- 24. Between management team meetings, risks are reviewed in consultation with risk and action owners, and updates are recorded in the corporate risk management information system (Pentana).
- 25. Regular risk management update reports are provided to this Committee in accordance with the City's Risk Management Framework and the requirements of the Charities Act 2011.

### **Identification of New Risks**

- 26. New and emerging risks are identified through several channels, including:
  - Directly by Senior Management Teams as part of the regular review process.
  - In response to ongoing review of progress made against Business Plan objectives and performance measures, e.g., slippage of target dates or changes to expected performance levels.
  - In response to emerging events and changing circumstances which have the potential to impact on the delivery of services.

# **Corporate and Strategic Implications**

- 27. Effective management of risk is at the heart of the City Corporation's approach to delivering cost effective and valued services to the public as well as being an important element within the corporate governance of the organisation.
- 28. The risk management processes in place in the Environment Department support the delivery of the Corporate Plan, our Departmental and Divisional Business Plans and relevant Corporate Strategies, such as the Climate Action; Cultural; Sport and Physical Activity; and Volunteering Strategies. Risks are also being considered as part of the development of the Natural Environment Division's emerging strategies.
- 29. Risks which could have a serious impact on the achievement of business and strategic objectives are proactively identified, assessed and managed in order to minimise their likelihood and/or impact.

### Conclusion

30. The proactive management of risk, including the reporting process to Members, demonstrates that the Natural Environment Division of the Environment Department is adhering to the requirements of the City of London Corporation's Risk Management Framework and the Charities Act 2011.

# **Appendices**

- Appendix 1 City of London Corporation Risk Matrix
- Appendix 2 Epping Forest Risk Register
- Appendix 3 Ashtead Common Risk Register
- Appendix 4 Burnham Beeches and Stoke Common Risk Register
- Appendix 5 Coulsdon and Other Commons Risk Register
- Appendix 6 West Wickham and Spring Park Risk Register
- Appendix 7 Natural Environment Cross-Divisional Summary Risk Register

### Contact

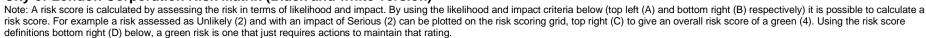
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#### City of London Corporation Risk Matrix (Black and white version)





#### (A) Likelihood criteria

	Rare (1)	Unlikely (2)	Possible (3)	Likely (4)
Criteria	Less than 10%	10 – 40%	40 – 75%	More than 75%
Probability	Has happened rarely/never before	Unlikely to occur	Fairly likely to occur	More likely to occur than not
Time period	Unlikely to occur in a 10 year period	Likely to occur within a 10 year period	Likely to occur once within a one year period	Likely to occur once within three months
P Nerical O	Less than one chance in a hundred thousand (<10-5)	Less than one chance in ten thousand (<10-4)	Less than one chance in a thousand (<10-3)	Less than one chance in a hundred (<10-2)

# (B) toppact criteria

Impact title	Definitions
Minor (1)	Service delivery/performance: Minor impact on service, typically up to one day. Financial: financial loss up to 5% of budget. Reputation: Isolated service user/stakeholder complaints contained within business unit/division. Legal/statutory: Litigation claim or find less than £5000. Safety/health: Minor incident including injury to one or more individuals. Objectives: Failure to achieve team plan objectives.
Serious (2)	Service delivery/performance: Service disruption 2 to 5 days. Financial: Financial loss up to 10% of budget. Reputation: Adverse local media coverage/multiple service user/stakeholder complaints. Legal/statutory: Litigation claimable fine between £5000 and £50,000. Safety/health: Significant injury or illness causing short-term disability to one or more persons. Objectives: Failure to achieve one or more service plan objectives.
Major (4)	Service delivery/performance: Service disruption > 1 - 4 weeks. Financial: Financial loss up to 20% of budget. Reputation: Adverse national media coverage 1 to 3 days. Legal/statutory: Litigation claimable fine between £50,000 and £500,000. Safety/health: Major injury or illness/disease causing long-term disability to one or more people objectives: Failure to achieve a strategic plan objective.
Extreme (8)	Service delivery/performance: Service disruption > 4 weeks. Financial: Financial loss up to 35% of budget. Reputation: National publicity more than three days. Possible resignation leading member or chief officer. Legal/statutory: Multiple civil or criminal suits. Litigation claim or find in excess of £500,000. Safety/health: Fatality or life-threatening illness/disease (e.g. mesothelioma) to one or more persons. Objectives: Failure to achieve a major corporate objective.

#### (C) Risk scoring grid

			Imp	act	
	Х	Minor (1)	Serious (2)	Major (4)	Extreme (8)
poo	Likely	4	8	16	32
	(4)	Green	Amber	Red	Red
Likelihood	Possible (3)	3 Green	6 Amber	12 Amber	24 Red
	Unlikely	2	4	8	16
	(2)	Green	Green	Amber	Red
	Rare	1	2	4	8
	(1)	Green	Green	Green	Amber

#### (D) Risk score definitions

RED	Urgent action required to reduce rating
AMBER	Action required to maintain or reduce rating
GREEN	Action required to maintain rating

This is an extract from the City of London Corporate Risk Management Strategy, published in May 2014.

Contact the Corporate Risk Advisor for further information. Ext 1297

October 2015

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# **Epping Forest Risk Register**

**Report Author:** Joanne Hill **Generated on:** 02 May 2023



#### Rows are sorted by Risk Score

Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating &	& Score	Risk Update and date of update	Target Risk Rating &	Score	Target Date/Risk Approach	Flight path
W-NE 007 Wanstead Ork Reservoirs	Cause: Gradual deterioration of the fabric of the reservoirs and / or excessive rain.  Event: Risk that the reservoirs may overtop and be washed away, leading to a cascading breach.  Impact:  Potential for loss of life or injury to staff/residents.  Legal action by the Environment Agency.  Low level flooding of the park and surrounding residential/commercial areas.  Damage to a listed landscape.  Requirement for significant immediate CoL funds to repair damage.  Civil claims/financial loss claims made from residents/ businesses.  Adverse effect on the reputation of the City corporation (local/national media interest).  Park closed for several weeks.	Impact	24	Engineering study completed November 2020 recommended a lower level of activity required than originally envisaged. While the Large Raised Reservoirs (LRRs) are classified as High Risk under the Reservoirs Act 1975 and the Flood and Water Management Act 2010, their Dam Category of C or D means that the outcome of failure is relatively small. A further additional assessment of the interaction between the River Roding and Ornamental Waters has been undertaken.  The project progressed through Gateway 4 in January 2023.  Detailed designs for dam strengthening works and the reinstatement of the upcascade pumping system are now being progressed with procurement due shortly.  The City Surveyors are progressing works to reinstate the River Roding numbhouse	Ulefrood library libra	8	30-Jun-2024	

		and other land drainage works to increase water supply to the Ornamental Water. An application for winter abstraction is with the Environment Agency.			
		The GLA Fund SuDS Feasibility report was finalised in February 2023. A bid to Round 2 of the Green and Resilient Spaces Fund was submitted but was unsuccessful. Alternative approaches to funding this are now being considered.			
00 Dec 2010		In October 2021, a weekly inspection of the Perch Pond dam revealed a leak in the vicinity of the outflow structure. This remains under in consultation with the supervising Panel Engineer.			
09-Dec-2019  Juliemma  McLoughlin		21 Apr 2023		Reduce	

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Notion no, Title,	Action description			Latest Note Date	Due Date
ENV-NE 007d Environment Agency Actions	Confirm to EA that measures in the interest of safety have been completed.	The Supervising Panel Engineer is kept up to date with the project's progress during their sixmonthly inspections of the lakes, during which the Panel Engineer determines if further action is required. The next inspection is due on 26 April 2023.  Gateway 4 approval has now been received.	Tim Munday	21-Apr-2023	30-Jun-2024
ENV-NE 007h Gateway 5 report	A Gateway 5 report will be prepared to request funding and permission to progress works on site.  Procurement and progression of detailed designs, tendering for site works, gaining required permissions, design consultation, enabling works and to works to begin on site.	Tender and procurement documentation are being prepared and possible consultants and contractors are being identified. Procurement exercise is due to progress in late spring/early summer.	Tim Munday	21-Apr-2023	25-Jan-2024

Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score	Risk Update and date of update	Target Risk Rating & Score	Target Date/Risk Approach	Flight path
Page 1133  20-Apr-2023 Paul Thomson	Cause: Large numbers of older, more vulnerable trees throughout Epping Forest which require regular inspection and works to prevent failure. A rise in tree disease combined with extreme weather conditions due to climate change exacerbate the risk. Staff shortages due to the Target Operating Model (TOM) process have resulted in insufficient staff resources to complete necessary works.  Event: More frequent tree failures. Greater risk during high winds, particularly when accompanied by heavy rainfall, and when trees are in leaf.  Effect: Public safety - people (serious injury/death) and property; loss of trees; loss of habitat; insurance claims; reputational damage.	Impact 32	This risk is actively managed with regular inspections of trees according to Forestwide risks zones as well as the Severe Weather Protocol which is implemented in the event of large storms/high winds.  As at 24 March 2023, the risk score was set to the maximum (likely/extreme) due to a single Poplar tree identified as dangerous in close proximity to the M25 and beneath high voltage power cables. Negotiations with traffic and power responsible organisations have produced a plan for felling of the tree by a third party in May 2023. Following that action, the risk score will be reassessed and lowered if appropriate.  A hazardous tree survey was completed in 2022 but works arising, particularly at the amber zones, have not been completed due to recruitment restrictions and larger numbers of hazardous trees being identified. These works are unlikely to be completed this year. Red zones are being prioritised. The situation will be kept under review.  We are supplementing our teams with the use of specialist contractors to help address deadlines until such time as we are able to recruit staff on a permanent basis.  102 May 2023		Reduce	

Action no, Title,	Action description	Latest Note		Latest Note Date	Due Date
ENV-NE-EF 017a Tree safety works	Carry out tree safety survey and works.	A tree safety survey has been completed but staff shortages have meant that arboricultural works are significantly delayed, and many actions have slipped out of time - we now aim to complete them by the end of 2024. Contractors have been engaged to carry out a section of high priority roadside works and bids for further resource are likely to be lodged during 2023. Following a rise in Massaria and sooty bark disease infections, and severe storms, it is anticipated that new surveys will result in circa 1,500 new tasks to be completed, adding substantially to the backlog of works. We have been unable to employ more staff and have had to increase contractor works to reduce the backlog.	Thomson	02-May-2023	31-Dec-2024
ENV-NE-EF 017b Severe Weather Protocol	Continue to enforce the Severe Weather Protocol as appropriate and keep it under regular review.	A Severe Weather Protocol is in place which details planning and response, in particular to high winds. We are unable to 'close' the Forest during such events but social media and staff broadcast messages to warn members of the public to avoid the Forest, and serious or large scale events are followed by a programme of walking trails and paths to find and action resulting dangers such as hanging tree limbs.	Paul Thomson	02-May-2023	31-Mar-2024

Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score	Risk Update and date of update	Target Risk Rating & Score	Target Date/Risk Approach	Flight path
Page 11-15  Page 19-Aug-2015  Paul Thomson	Causes: Insufficient maintenance resource; failure to implement recommendations; damaging activity by visitors to the Forest.  Event: Failure to meet statutory regulations and checks. Assets deteriorate to unusable/unsafe condition.  Effect: Poor condition of assets; loss of value; cost of repair; fines from Local Authority and other statutory bodies.	Impact 24	Investigating investment opportunities for the Warren House for long-term sustainable use. Investment in buildings from local risk is slow but proceeding. Cyclical Works Programme (CWP) investment has been significantly reduced below the levels reported last year. This risk therefore remains at Red and potentially escalating. We are investigating innovative solutions to accelerate and secure capital investment in lodges and other built assets at Epping.  The number of empty lodges has risen recently due to vacancies. Staff terms and conditions are under review as part of the Target Operating Model (TOM) process and this will affect prioritisation of works over the coming months.  Several significant assets are in decline and works have revealed further unseen dilapidations we do not have resources currently planned to address. The target score remains at Red, to indicate that we are aiming to maintain our current position based on existing budgets and do not anticipate significant improvement in the coming year. At Epping Forest, the CWP award is insufficient to meet even the most essential investment needs.  This risk has been expanded to include machinery, fleet and heritage assets.  20 Apr 2023	Impact	Accept	

Action no, Title,	Action description	Latest Note		Latest Note Date	Due Date
ENV-NE-EF 004d Statutory compliance of buildings	Schedule of statutory checks and visits held and carried out by City Surveyor's or delegated to site.	Comprehensive Fire Risk Assessment Audits have been carried out across all Epping Forest sites with no local actions outstanding.	Jo Hurst	20-Apr-2023	30-Sep-2023
ENV-NE-EF 004e Annual building inspections	Joint inspection of all buildings including residential by site and City Surveyor's to capture maintenance needs. Required annually.	COVID-19 and changes of staff in the City Surveyor's Department (CSD) have delayed progress. Some empty lodges have been visited for condition surveys. Changes to structures in CSD may mean they no longer attend site for inspections.	Jo Hurst	20-Apr-2023	30-Sep-2023
ENV-NE-EF 004g Upkeep of Great Gregories Farm	Put actions and processes in place which ensure the upkeep and development of the site.	The replacement of the roof on the small barn has been postponed further under CWP, with no future date identified.  Roofing for Pad1 is a Spend to Save project moving through the Gateway process, subject to a 40%		20-Apr-2023	30-Sep-2023
ENV-NE-EF (14-j Maintain (36) network	Monitor the path network annually and carry out necessary maintenance.	Defra grant.  The path network is monitored on an annual basis, and a maintenance programme prepared to address issues raised.  We have £250k RASC funding, recently confirmed after review, for environmental damage to paths caused by high levels of use by visitors.		20-Apr-2023	30-Sep-2023
ENV-NE-EF  Ak Aging condition of fleet	Fleet replacement programme	Some remaining assets such as vehicles, tractors and other mobile agricultural machinery are exceeding their operational life and failing increasingly tight environmental standards, such as the extension of ULEZ. All replacements must be funded by local risk as no central fund is available. Budget has been prioritised for a series of replacements, using part exchange, hire purchase or other financial arrangements to allow the most efficient replacement of assets, prioritised by risk.	Jo Hurst	20-Apr-2023	31-Mar-2024
ENV-NE-EF 004l Protect Scheduled Ancient Monuments	Maintain the condition of the scheduled ancient monuments (SAMs).  Improve the current state of knowledge of the extent of the monuments.  Protect the monuments from erosion due to visitor activities.	Conservation Management Plans are in preparation for Loughton Camp and Ambresbury Bank to manage the conflicting risks of protection of the Scheduled Ancient Monuments (SAMs) and the veteran trees upon the monuments.  The SAMs at Purlieu Bank (2 sections) and The Temple at Warlies Park are subject to ongoing review.  We undertook a LiDAR of all SAMs during winter 2022/23, while trees were not in leaf. Results are currently being interpreted.  Specific plans are being prepared to alter public use of SAMs to prevent erosion.	Sally Gadsdon	20-Apr-2023	31-Dec-2023

Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Sco	ore	Risk Update and date of update	Target Risk Rating & S	Score	Target Date/Risk Approach	Flight path
ENV-NE-EF 006 Raised Reservoirs	Cause: Inadequate design; insufficient prescribed maintenance; leaks compromising dam integrity; failure to implement Panel Engineer's recommendations; failure to keep dams clear of vegetation; failure to evaluate large water body capacities; disputed ownership/responsibility for one LRR.  Event: Severe rainfall event resulting in overtopping of embankments, leading to erosion of dam and potential collapse.  Effect: Loss of life; damage to downstream land/property; litigation; risk of prosecution; reputational harm; damage to/loss of habitat and associated rare species; fines from Environment Agency.		24	No change to current risk score.  Work at Birch Hall Park was completed in September 2022.  Following two unsuccessful tender exercises to obtain a Design-Build contractor for the Baldwins Pond project, the procurement strategy is being reconsidered. It is now proposed to appoint a consultant to carry out a full design before separately tendering a works-only contract.  20 Apr 2023	Impact	4	31-Oct-2024 Reduce	
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Action no, Title,	Action description	Latest Note		Latest Note Date	Due Date
ENV-NE-EF 006a Panel Engineer inspections	Statutory inspection visits by engineer - 6 monthly in May and October.	Twice yearly inspections completed on schedule as agreed with the Panel Engineer.	Paul Thomson	20-Apr-2023	31-Mar-2024
ENV-NE-EF 006c Internal inspection regime	Weekly inspection of reservoirs/dam.	Ongoing action. Digital Blue Books are being completed at agreed intervals. Formal recording has moved to an online process.	Laura Lawson	20-Apr-2023	31-Mar-2024
ENV-NE-EF 006e Baldwins Pond and Birch Hall Park Pond	Undertake scoping evaluations for Baldwins Pond and Birch Hall Park Pond.	Work on Birch Hall Park Pond was completed in September 2022.  Following two unsuccessful tender exercises to obtain a Design-Build contractor for the Baldwins Pond project, the procurement strategy is being reconsidered. It is now proposed to appoint a consultant to carry out a full design before separately tendering a works-only contract.	Paul Thomson	20-Apr-2023	31-Oct-2023
ENV-NE-EF	Maintenance of Rookery Wood, Tudor	District Surveyor's Division to fund and plan maintenance works. A plan to schedule the structure	Paul	20-Apr-2023	31-Mar-2024

-	and seek Countryside Stewardship Funding for some dam elements was approved by Committee in November 2022. We are currently looking at further survey work on heritage and biodiversity value with Historic England to explore options on the site and possible funding. This may have medium-term implications beyond 2024 for beginning to access site and explore modifying the earthworks in the long term. There is no funding from the Cyclical Works Programme at present. A draft report on the Historic England assessment has been submitted to the CoL.	Thomson		
	This will be linked to the Copped Hall Conservation Management Plan which has been completed and is currently out for consultation. District Surveyor's Division has carried out assessment works of the in-place dam structure and LiDAR mapping.			

Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Scor	ore	Risk Update and date of update	Target Risk Rating &	Score	Target Date/Risk Approach	Flight path
ENV-NE-EF 008 Invasive Non Native Species (INNS)  19-Aug-2015 Paul Thomson	Cause: Lack of adequate controls on international trade encourages transmission of invasive non-native species; inadequate site biosecurity often through conscious public release of INNS within Forest.  Event: Sites become occupied by INNS which can lead to the decline, hybridisation or loss of key native species due to outcompetition/disease transmission. Some INNS have health protection issues particularly moths producing urticating hairs and terrapins carrying Salmonella (DT 191a). Effect: Loss or decline of key species; temporary site closures; increased costs of monitoring and control. Threat to existing conservation status of sites.	Impact		OPM is a seasonal risk which remains red due to high levels over the summer. Other INNS continue to be monitored.  The current annual survey is underway. We are reducing reliance on spraying and are increasing the manual removal of caterpillars in high-traffic areas.  20 Apr 2023	Impact	12	30-Jun-2024 Reduce	

Action no, Title,	Action description	Latest Note		Latest Note Date	Due Date
ENV-NE-EF 008c INNS policy	OPM, although other pathogens and areas of concern to be tackled.	The importance of INNS (now DIES) to be reflected in plans for the new structure and recruitment under TOM, with key deliverables in policy and management.  Epping Forest INNS Pests and Pathogens Policy is in draft and will be taken to Committee for approval later in 2023.  An annual assessment and control process is in place. Financial and labour resources continue to be targeted on OPM (nest removal), Ramorum disease (spraying of rhododendron host regrowth), Giant Hogweed and Japanese Knotweed control. A spreadsheet of all INNS taxonomic groups is planned to provide a comprehensive basis for prioritising actions on species and to allow an INNS Action Plan as well as a policy approach.	Thomson	20-Apr-2023	31-Mar-2024
ENV-NE-EF 008g OPM Monitoring	This action tracks work done to mitigate the spread of Oak Processionary Moth in Epping Forest.	OPM is a seasonal risk and remains red due to high levels over the summer. Other INNS are being monitored as usual.  The current annual survey is underway. We are reducing reliance on spraying and are increasing the manual removal of caterpillars in high-traffic areas.	Paul Thomson	20-Apr-2023	31-Mar-2024

ENV-NE-EF 012 Loss of forest and buffer land accesses.  Event: Failure to recognise encroachments or legal limitation by the failure to act within a reasonable period of time.  Effect: Compromised statutory responsibility through loss of forest and buffer land to encroachment; concession of prescriptive rights and loss of potential income; significant costs and jeopardy of litigation in recovering rights; harm to City of London's reputation as Conservators.  16 The risk remains at the same level. We have not yet achieved the target to reach Amber due to test case issues (as below) and lack of resources in terms of completing on-site surveys.  Test cases put forward so far are too old to legally challenge, so we are not preferred at this time. We are currently seeking advice from the Legal Team as to how to address the remaining encroachments. We have compiled a report on unresolved encroachments which will be brought to Committee in 2023.  Access audit phase one (desk-based review) has been completed. However, more than half of the 38 compartments are still to have	Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score	Risk Update and date of update	Target Risk Rating & Score	Target Date/Risk Approach	Flight path
a ground-truthing field visit to assess the issues with access on the ground. Therefore, risk remains of potential prescriptive rights being developed. Resources to ensure this survey takes place will need to be reviewed as part of the Target Operating Model process (TOM).  19-Aug-2015 Paul Thomson  Reduce	012 Loss of forest and buffer land and/or concession of prescriptive rights  Page 120	point for Epping Forest boundaries and accesses.  Event: Failure to recognise encroachments or legal limitation by the failure to act within a reasonable period of time.  Effect: Compromised statutory responsibility through loss of forest and buffer land to encroachment; concession of prescriptive rights and loss of potential income; significant costs and jeopardy of litigation in recovering rights; harm to City of London's	Pice-bood	not yet achieved the target to reach Amber due to test case issues (as below) and lack of resources in terms of completing on-site surveys.  Test cases put forward so far are too old to legally challenge, so we are not preferred at this time. We are currently seeking advice from the Legal Team as to how to address the remaining encroachments. We have compiled a report on unresolved encroachments which will be brought to Committee in 2023.  Access audit phase one (desk-based review) has been completed. However, more than half of the 38 compartments are still to have a ground-truthing field visit to assess the issues with access on the ground.  Therefore, risk remains of potential prescriptive rights being developed.  Resources to ensure this survey takes place will need to be reviewed as part of the Target Operating Model process (TOM).	Impact	31-Mar-2024	

Action no, Title,	Action description			Latest Note Date	Due Date
	Undertake audits of all 38 Forest compartments and buffer land.	Audits have been suspended until completion of TOM recruitment.	Laura Lawson	20-Apr-2023	31-Mar-2024

Audit				·	
012d Assessment of	, ,	historic encroachments with a view to resolve the remaining encroachments. This draft is currently	Tristan Vetta	20-Apr-2023	31-Dec-2023

Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score	Risk Update and date of update	Target Risk Rating & Score	Target Date/Risk Approach	Flight path
ENV-NE-EF 013 Loss of knowledge in skilled staff / Difficulties in recruitment  Page 122  19-Aug-2015 Paul Thomson	Cause: Previous reliance on memory-based rather than documentary records; retirements amongst ageing workforce; remuneration and benefits package increasingly uncompetitive for market sector.  Event: Loss of knowledge and skills.  Effect: Extra training needs, difficulty in recruitment or induction of new staff.	Impact 16	Risk remains high due to loss of skilled staff related to the Target Operating Model (TOM) process and inability to recruit beyond Fixed Term Contracts.  We have continued to lose skilled staff throughout 2021 to 2023. This risk is an active issue at present. Skilled staff are being lost and we are unable to recruit to certain roles.  The original target to reduce the risk to Amber (6) by June 2022, has been significantly delayed until the outcomes and direction of the TOM are realised and vacancies are recruited to.  Introduction of a Talent Management Strategy is also awaiting the outcome of the TOM and has been delayed likely until mid-2023. The TOM process has negatively impacted staff retention.  20 Apr 2023	Impact 6	31-Mar-2024 Reduce	

Action no, Title,	Action description			Latest Note Date	Due Date
assessment	Identify key roles where officers are nearing retirement or expressing development needs or desire to leave CoL or the Department. Review this data annually via PDR's and one to ones.  Succession plan drawn up by Management	Talent management strategy deferred as awaiting finalisation of the TOM process and new structures. A number of key staff have been lost due to uncertainty during this transition.	Jo Hurst	20-Apr-2023	31-Mar-2024

	Team and agreed by the Assistant Director. HR support for key roles.				
ENV-NE-EF 013b Increase process documentation	8 3	CiviCRM solution has been delivered and has now been implemented throughout the Epping Forest teams.  The StarTraq system for management of PCNs and FPNs is also ready for deployment but delayed due to recruitment and structure pressures in Forest Keeper and Enforcement Team.	Jo Hurst	20-Apr-2023	31-Mar-2024
ENV-NE-EF 013c Appointment cross-over (budgetary issue)	Ability to recruit overlapping positions to allow transfer of knowledge. Budgetary consideration and proactive support from HR.	constraints and decisions taken on case-by-case basis.	Jo Hurst	20-Apr-2023	31-Mar-2024

Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating &	z Score	Risk Update and date of update	Target Risk Rating &	Score	Target Date/Risk Approach	Flight path
ENV-NE-EF 015 Public behaviour 19-Aug-2015 Paul Thomson	Cause: Crime; irresponsible dog owners; rough sleepers; user conflict; trespass; alcohol; unlicensed activity.  Event: Fly tipping, litter, dog fouling, dog attacks, abandoned/burnt out vehicles, traveller incursions, anti-social, irresponsible or unsafe behaviour.  Effect: Negative PR; injury to visitors; insurance claims; police exclusion zones; rise in crime rates; illegal occupancy of Forest land; increase in costs of managing public behaviour.	Impact	16	We work in partnership with a range of Police and Anti-Social Behaviour managers to manage this risk.  We accept that we cannot reduce this risk for the foreseeable future, but we have put in place a range of reasonable measures to limit the effects as far as we can.  20 Apr 2023	Impact	16	Accept	

Aution no,	Action description	Latest Note	Action owner	Latest Note Date	Due Date
ENV-NE-EF 113b Entrolling dogs	Implementation and monitoring of PSPOs and other dog control measures on sites.	PSPOs are subject to renewal in 2023. A Code of Conduct for responsible dog walking is in place. This is not high priority at present for enforcement, but we are monitoring and taking action where appropriate.	Paul Thomson	20-Apr-2023	31-Mar-2024
ENV-NE-EF 015f Develop and improve oint working	Develop stronger links and become a trusted partner with EFDC, LBWF, LBR and LBN. New relationships with officers in local authorities need creating/developing following staff changes Ongoing action	We now work in partnership with a range of Police and ASB managers to address this risk.	Paul Thomson	20-Apr-2023	31-Mar-2024
ENV-NE-EF 015i Address problematic public behaviour	Take appropriate action to address cases of anti-social, irresponsible and unsafe public behaviour.	Officers continue to monitor rough sleeping, fly-tipping, anti-social behaviour and conflict between forest users. They work with appropriate local authorities and agencies to deal with individual cases.	Paul Thomson	20-Apr-2023	31-Mar-2024
ENV-NE-EF 015j Develop an Enforcement	Develop an Enforcement Policy to deal with public behaviour which contravenes the Epping Forest byelaws.	This policy will ensure that City of London staff, those we regulate, and other stakeholders and partners are aware of the intent and principles underpinning our approach to the action we may take when managing unlawful activity in Epping Forest.	Laura Lawson	20-Apr-2023	30-Sep-2023

Policy		A draft Policy has been prepared and will be presented to Committees in due course.			
ENV-NE-EF 015k Influence public behaviour	Encourage safe and responsible use of the Forest.	Activity based codes of conduct or guidelines for cycling, dog walking, fishing and horse riding have been developed and are available online.  A general code of conduct for visiting Epping Forest, based on the Countryside Code has been developed. Widespread distribution of this needs further work.	Paul Thomson	20-Apr-2023	30-Sep-2023
		The Epping Forest Communications plan includes key messages about behaviour and respect for others.  An Enforcement Policy and an Anti-Social Behaviour Policy have been drafted and will be presented to Committees in due course.			

Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Sc	core	Risk Update and date of update	Target Risk Rating & S	Score	Target Date/Risk Approach	Flight path
ENV-NE-EF 003 Health and Safety incidents / Catastrophic Health and Safety failure  Pag 19-Aug-2015 Test Thomson	Cause: Poor understanding and/or delivery of Health and Safety policies and procedures; failure to link work activity with adequate procedures; risk assessments and safe systems of work not undertaken or completed incorrectly; inadequate appropriate training; failure to implement the results of audits; uncertainties due to the ongoing TOM process.  Event: Staff, volunteers, contractors or licensees undertake unsafe working practices. Insufficient staff numbers and heavier workload for those who are in post.  Effect: Injury or death of staff, volunteers, contractors, licensees or members of the public; prosecution by HSE and/or Police; increased insurance premiums; harm to City's reputation; fine levied by HSE; staff experience higher levels of physical and mental stress.			Staff shortages due to the Target Operating Model (TOM) process have reduced resource but we continue with all necessary monitoring, audits and risk assessment.  A programme of training will be required as we move forward with recruitment and cross skilling into new structures.  A new risk (ENV-NE-EF 017: Tree Failure) has been added to the register to specifically address dangerous trees and associated health and safety risks. Therefore, tree-specific information is no longer included in this risk and the current score has been reduced to Amber 12 (possible / major).  102 May 2023	Impact	12	Accept	

Action no, Title,	Action description			Latest Note Date	Due Date
ENV-NE-EF 003c Training programme	training needs. Continual and annual review.	H&S training (operational) system is in place and established. Expiring training known in advance and scheduled. Training items that were delayed or deprioritised due to COVID-19 related complications have been subject to a 'catch-up' plan which has been implemented. A training matrix link to induction and new starters is in place.	Jo Hurst	06-Jan-2023	31-Mar-2024
003e Hierarchy responsibilities and	documentation and reinforced by training.	All roles and responsibilities are outlined and clarified in the agreed local Health and Safety statement. Due to the current high number of vacancies, there are gaps in responsibilities which are being prioritised on a risk basis. Significant review will be necessary post-TOM.	Paul Thomson	06-Jan-2023	31-Mar-2024

ENV-NE-EF 003f Annual licensee checks	H&S checks undertaken annually for all refreshments and food outlets under licence in the forest, excluding ice cream vans	Annual licensee checks take place: we are concentrating on catering outlets where there are specific issues around hygiene ratings and other issues. Checks may be extended to other commercial tenants, e.g. Cricket Pavilions, but this may just be a single reminder of responsibilities. Event licences on Forest land are being directed to the Local Authority Safety Advisory Group.	Jo Hurst	06-Jan-2023	31-Mar-2024
ENV-NE-EF 003g Staff health, safety and wellbeing	Provide support to staff where possible.	Prolonged understaffing due to uncertainties of extended TOM and restrictions on recruitment is resulting in overstretched staff and physical and mental stress.  Key team members are trained Mental Health First Aiders but this is a reactive function intended to notice and act upon indicators of mental health crisis, and these staff and managers are unable to remedy situations to reduce work stresses as they currently present themselves.  Support such as Occupational Health and the Employee Assistance Programme is advertised and communicated, but underlying issue of unsustainable work pressure cannot be resolved until TOM programme is wholly complete and embedded.	Jo Hurst	07-Jan-2023	31-Mar-2024

Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score	Risk Update and date of update	Target Risk Rating & Score	Target Date/Risk Approach	Flight path
Page 128  19-Aug-2015 Paul Thomson	Cause: Lack of adequate controls on international trade encourages transmission of pathogens; inadequate site biosecurity; and spread of novel pathogens responding to changes in climate presence of suitable hosts.  Event: Sites become infected by pathogens causing diseases which lead to the decline or loss of key species.  Effect: Loss or decline of key species; temporary site closures; increased costs for biosecurity, monitoring and reactive maintenance. Threat to existing conservation status of sites, particularly those with woodland habitats.	Impact 12	The highly pathogenic Avian Influenza (HPAI) variant HN51 has been declared over, but we continue to monitor our wildfowl populations for any symptoms or unexpected fatalities. Public information signage will be reviewed.  Ramorum: Rhododendron regrowth continues to require treatment by spraying. Annual inspections are carried out and will next be done in late 2023. Otherwise, there are no obvious increases in risk factors.  Ash Dieback: There are no obvious changes, but if weather patterns continue, this is likely to lead to larger ash deterioration. This is being picked up by existing monitoring in target zones but remains a concern.  Sooty bark disease: This remains a significant problem and now forms a major part of the annual Hazardous Tree Programme.  We accept that we cannot reduce this risk for the foreseeable future, but we have put in place a range of ongoing measures and longer-term actions to limit the likelihood and impacts as far as we are able.  20 Apr 2023	Impact 12	Accept	

Action no, Title,	Action description	Latest Note A		Latest Note Date	Due Date
ENV-NE-EF 007a Massaria survey	Undertake a survey for Massaria twice a year and implement actions which arise.	Staff shortages significantly affected the completion of the tree safety program during 2022.  However, Massaria management, involving climbing surveys of affected trees, has been completed.  Tho		20-Apr-2023	31-Mar-2024
ENV-NE-EF 007d Ramorum Disease	Sudden Oak Death - Annual inspection of all Rhododendron.	Additional work: mature and large Rhododendron bushes are being removed (by uprooting - to avoid future spraying control where possible).		20-Apr-2023	31-Mar-2024
ENV-NE-EF 007e Biosecurity policy	implement.	Biosecurity position statement was completed. The location-specific biosecurity measures remain in place at Warren Plantation and were reviewed comprehensively in May 2022.  Wider biosecurity measures for other pathogens are yet to be determined or agreed: a report is due by the end of 2024. The biosecurity measures will now be integrated into the INNS Action Plan for completion in 2024.  An Epping Forest INNS Pests and Pathogens Policy is in draft and will be brought to Committee later in 2023. The Policy articulates our response to each of these threats.	Paul Thomson	20-Apr-2023	31-Dec-2024
ENV-NE-EF (N) g Avian Coluenza	Undertake a weekly survey of bird fatalities.	A weekly survey of the highly pathogenic Avian Influenza bird fatalities is carried out. Ad hoc monitoring is still being undertaken but the 2023/23 outbreak has been declared over.	Laura Lawson	20-Apr-2023	31-Mar-2024

Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score	Risk Update and date of update	Target Risk Rating & Score	Target Date/Risk Approach	Flight path
	Cause: Lack of suitable protections in Epping Forest Acts; Planning Authorities obligations to meet housing targets; failure to monitor and challenge housing and other development plans; lack of resources to employ specialist support or carry out necessary monitoring/research.  Event: Large housing, transport infrastructure or other developments on land affecting Epping Forest.  Effect: Change in character to the context and setting of Forest Land; potential increase in visitor numbers and recreational pressure; increased air, light and noise pollution and consequent potential decline in biodiversity and tranquillity; further increases in traffic volumes on local road network.	Impact 12	The Epping Forest District Council (EFDC) Local Plan HRA has now been fully updated in relation to air pollution. An Air Pollution Mitigation Strategy (APMS) was approved by EFDC full council in February 2021. Nonetheless, elements of this APMS remain to be resolved due to controversy about their introduction or effectiveness - namely the Clean Air Zone - and development sites still present an air quality risk as a result.  The London Borough of Waltham Forest (LBWF) Local Plan Examination in Public took place in April 2022. The CoL continues to liaise with LBWF on the Air Quality Management Strategy and SANGS options with a view to securing appropriate protection for the forest.  Local Authorities are close to completing the Epping Forest Special Area of Conservation (EFSAC) Mitigation Strategy.  20 Apr 2023	Impact 12	Accept	

Action no, Title,	Action description		Latest Note Date	Due Date
nties Local	meetings and respond to consultation on the	SAC Oversight Group has now agreed governance, finance and a package of mitigation measures. We await sign-off from the relevant committees of these LAs to approve. LB Redbridge has already approved and LB Waltham Forest will do so via delegated powers.	20-Apr-2023	30-Sep-2023

U	England. LB Waltham Forest Core Strategy and other LA actions plans: Respond to any further consultation.			
ENV-NE-EF 010c Forest Transport Strategy		Jacqueline Eggleston	20-Apr-2023	31-Dec-2023

Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & S	Score	Risk Update and date of update	Target Risk Rating &	Score	Target Date/Risk Approach	Flight path
ENV-NE-EF 016 Financial management and loss of income  O  D  May-2016  May-2016  Two Thomson	Cause: The CoL is facing austerity efficiencies: revisions to EU common agricultural policy (CAP) regulation, transition from Basic Payment Scheme (BPS) (total cessation in 2027) and UK interpretation and tightening of qualifying eligibility criteria. Failure to deliver to spend profile may result in loss of budget; lack of skills/capacity to deliver income generation projects; unrealistic initial targets and deadlines. Possible impact of Brexit.  Event: Reduction deficit funding from the CoL; reductions in direct grant available from the Environment Agency or Rural Payments Agency (RPA) to deliver agricultural/conservation activity, especially conservation grazing. Division is unable to deliver spend to profile or income generation programmes to agreed targets and timescales. Adverse workload impact on service delivery.  Effect: Reduction in income. Reduction or cessation of agricultural/conservation activity, including negative impact on	Impact	12	There remains a need to achieve savings and manage inflationary pressures. Our focus is currently on car parking, lodge rentals, commercial wayleaves, and public events.  Applications to the Rural Payments Agency's (RPA) Countryside Stewardship Scheme are being made in April 2023 which will stem the loss of Basic Payment Scheme (BPS) income. Furthermore, new grant schemes under the Environment Land Management Programme also offer additional income for the future.  In the meantime, we accept that we cannot reduce the risk further, but will keep it under regular review.  20 Apr 2023	Impact	12	Accept	

Action no, Title,	Action description	Latest Note		Latest Note Date	Due Date
ENV-NE-EF 001e Next round of savings to be	Working to deficit budget reduction targets by increasing income generation.	Net income from car parking, lodge rentals and commercial wayleaves has met current budgets, but further efficiencies and income enhancement must be found over the coming years.  The draft Natural Environment Division's strategies include a focus on income generation. We are	Jo Hurst; Paul Thomson	20-Apr-2023	31-Mar-2024
agreed		also awaiting the outcome of the Natural Environment Charity Review which may present additional opportunities through changes to financial structures and governance.			

Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score	Risk Update and date of update	Target Risk Rating & Score	Target Date/Risk Approach	Flight path
ENV-NE-EF 005 Declining Site of Special Scientific Interest (SSSI)/Special Area of Conservation (SAC) Condition  Page 1333	(INNS); anthropogenic nitrogen deposition; atmospheric pollution; and climate change.	Impact 8	10-year Countryside Stewardship (CSS) Agreement (Forest 1) for part of the SSSI is in place for 2020-2029 and is being delivered; this includes three SSSI units in "unfavourable" condition.  Three further applications to cover the remainder of the SSSI, Wanstead Park and Copped Hall are being prepared. Forest 2 will be submitted in 2023 with work planned to start in 2024. The Wanstead Park and Copped Hall applications will be submitted in 2024.  Work is being targeted to address some of the reasons for 'unfavourability' in the units in this second half of the Forest.  Expansion of conservation grazing should see an improvement in the grassland management of sites within the SSSI.  The site sustained significant damage to the fabric of the SSSI/SAC due to increased visitor numbers during COVID-19, with a rise of around 300%. Damage to entrances and ride edges has been significant. Pathways have proliferated in the wooded areas. Part of the second CSS application includes a request for visitor management infrastructure to help alleviate visitor damage.  20 Apr 2023	Impact 8	Accept	

Action no, Title,	Action description		Action owner	Latest Note Date	Due Date
ENV-NE-EF 005a Countryside Stewardship (CSS) grant	Make CSS grant application to avoid loss of this vital income stream whilst ensuring habitat management targets are sustainable across 10-year agreement period.	10-year Countryside Stewardship Agreement (Forest 1) for part of the SSSI has been achieved and is being delivered.  A second agreement is being sought for the remainder of the Forest (Forest 2); this is currently being prepared and is due for submission in April 2023 with work planned to start in 2024. Further applications for Copped Hall Park and Wanstead Park have also been agreed by Committee and will be submitted in 2024.	Thomson	20-Apr-2023	30-Apr-2024
ENV-NE-EF 005b Biodiversity 2020 targets for SSSI	Create plan of action for 5 compartments within existing resources to ensure consideration of priorities for CSS application.	Natural England officers will be reviewing the remaining SSSI compartments for reassessment.	Paul Thomson	20-Apr-2023	31-Mar-2024

Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score	Risk Update and date of update	Target Risk Rating & Score	Target Date/Risk Approach	Flight path
Page 135	Cause: Severe gale and storm events; prolonged precipitation/increased precipitation events; restricted precipitation increasing fire severity.  Event: Severe weather events including periods of drought; flooding; gales; and increased fire severity.  Effect: Risk of injury or death to staff, visitors, contractors and/or volunteers; loss of habitat/public access and intensification of visitor pressure on other areas of Forest; damage/loss of rare/fragile habitats and species; incidents increase demand for staff resources to respond to maintain public and site safety; temporary site closures; increased costs for reactive management.	Impact 8	Incident management plan has been updated to incorporate wildfire planning and the JESIP protocols for joint action across authorities. The London Fire Brigade, Fire and Rescue Services have signed off wildfire plans both in London and Essex. There are site visits with Essex Fire and Rescue Service at the end of July / early August to confirm infrastructure is satisfactory. In London, two additional sites are having wildfire response plans prepared.  Several large storms during 2022 led to the Severe Weather Protocol being implemented.  The current risk score remains at Amber 8 (likely; serious) due to dry summers increasing the risk of wildfires and driving sooty bark disease of maples, bleeding canker of horse chestnuts, and Massaria disease of London Plane. We have implemented mitigating actions to maintain the risk at its current level but are unable to reduce it any further for the foreseeable future.			
19-Aug-2015 Paul Thomson			02 May 2023		Accept	

Action no, Title,	Action description			Latest Note Date	Due Date
ENV-NE-EF 009g Tree	3 3	A tree safety survey has been completed but staff shortages have meant that arboricultural works are significantly delayed and many actions have slipped out of time - we now aim to complete them by	Paul Thomson		31-Dec-2024

Safety works		the end of 2024. Following a rise in Massaria and sooty bark disease infections, and severe storms, it is anticipated that new surveys will result in circa 1,500 new tasks to be completed, adding substantially to the backlog of works. We have been unable to employ more staff and have had to increase contractor works to reduce the backlog.			
	Reduce the impact of grass and heathland fires.	Nine site-specific wildfire response plans have been signed off by the respective Fire and Rescue Services. Site inspections by fire officers have been completed at the London sites. Further work is required with Essex Fire Brigade.	Paul Thomson	20-Apr-2023	01-Nov-2023
ENV-NE-EF 009i Fire access zones	Maintain fire access zones.		Paul Thomson	20-Apr-2023	30-Sep-2023

Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score	Risk Update and date of update	Target Risk Rating & Score	Target Date/Risk Approach	Flight path
ENV-NE-EF 011 Wanstead Park – Heritage at Risk Register  Aug-2015 Dal Thomson	Cause: Grade II* Registered Park and Garden, Wanstead Park, has been on the "Heritage at Risk" register since 2009, listed as in declining condition. Further restoration by four landowners is required to halt deterioration in condition and secure continued abstraction licence.  Event: Failure to complete restoration work.  Effect: Wanstead Park remains on the Heritage at Risk Register: continuing deterioration of at risk heritage features; education and interpretation opportunities missed; deteriorating state impacts negatively on the City's reputation; fines from English Heritage in respect of listed buildings.	Impact 8	This remains at risk with Historic England (HE). However, there have been productive meetings with HE and the Wanstead Park Liaison Group. Limited preliminary works are underway at The Grotto.  An application for a Countryside Stewardship grant for 2024 has been approved by Committee.  The London Borough of Redbridge has identified £100,000 of SANGS funding for the park which will be used to improve access from the River Roding path into the park.  20 Apr 2023	Impact	Accept	

Action no, Title,	Action description			Latest Note Date	Due Date
	•	Funding is being worked on through the Wanstead Park Project Board; a Gateway 5 report was approved by Committee in January 2023 for £1.15m and works will commence in 2024.  The principal challenge is that project match funding does not qualify under City capital prioritisation rules.	Thomson	20-Apr-2023	31-Mar-2024

Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Scor	Risk Update and date of update	Target Risk Rating & Score	Target Date/Risk Approach	Flight path
ENV-NE-EF 014 Major Incident resulting in prolonged 'Access Denial'	Cause: Pandemic; human error; mechanical failure; deliberate act of terrorism.  Event: Major incident; terrorism; evacuation of East London; aircraft crash; failure of underground services; major pollution incident from M25; pollution from septic tanks or cattle buildings.  Effect: Damage to, and loss of, Forest habitat; threat to existing conservation status of sites; reduced income from licensees unable to trade; costs of remediation and staff engagement; fines from Environment Agency for pollution incidents.	Impact	We have accepted this risk in recognition of how this will remain an active issue in the coming years. We are confident that our work in this area has been successful but will continue to assess protocols going forward.  The Emergency Plan worked well during the COVID-19 pandemic and lessons learned during that time have now been incorporated in the Plan and our Business As Usual routines. The Emergency Plan was tested using the JESIP (Joint Emergency Services Interoperability Principles) Framework and has been implemented and supported by additional measures.  20 Apr 2023	Impact 8	Accept	

Action no, Title,	Action description			Latest Note Date	Due Date
ENV-NE-EF 014a Emergency Plan	Emergency Plan.	The Emergency Plan worked well during the COVID-19 pandemic and lessons learned during that time have now been incorporated in the Plan and our 'business as usual' routines. The Emergency Plan was tested using the JESIP (Joint Emergency Services Interoperability Principles) Framework and has been implemented and supported by additional measures.  The plan is kept under regular review.	Paul Thomson	20-Apr-2023	31-Mar-2024

# Ashtead Common Risk Register

**Report Author:** Joanne Hill **Generated on:** 02 May 2023



#### Rows are sorted by Risk Score

Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating &	Score	Risk Update and date of update	Target Risk Rating & S	Score	Target Date/Risk Approach	Flight path
EW-NE-AC At Local Banning Issues 139	Cause: Pressure on Planning Authorities to meet housing targets. Failure to monitor and challenge housing and other development plans. Lack of partnership working with Planning Authorities and inclusion in Local Development Plans. Lack of resources to employ specialist support or carry out necessary monitoring/research.  Event: Increase in housing or other developments on land affecting Ashtead Common.  Effect: Increase in visitor numbers and general recreation pressure; potential decline in biodiversity due to disturbance and habitat quality; increase in air, light and noise pollution; decrease in water availability; increased hydrological pollution risk; increase in traffic on local road network.	Impact	8	Local plans continue to be developed and are scrutinised and commented on when required.  Epsom and Ewell Council have begun consultation on a new Local Plan that could see significant residential development in the vicinity of Ashtead Common. Locally there are limited resources to engage with this process. For this reason the risk score has been increased to 'likely / serious'. This will be an extended consultation process, therefore the target date has been set to March 2025.  The Local Plans of Mole Valley and Kingston generally protect the immediate environs of Ashtead Common. However, possible areas for development are identified within the general area, and this could increase pressures on the Common in the long term.  26 Apr 2023	Impact	6	31-Mar-2025	

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Andy Thwaites							
Action no, Title,	Action description	Latest Note				Latest Note Date	Due Date
ENV-NE-AC 004c Ongoing Review	Keep situation under regular review.	This situation is kept u	nder regula	r review.	Andy Thwaites	26-Apr-2023	31-Mar-2024

Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score	Risk Update and date of update	Target Risk Rating & Score	Target Date/Risk Approach	Flight path
ENV-NE-AC 009 Maintenance of buildings and other structures  Page 1441  15-Jun-2022 Andy Thwaites	Cause: Poor condition of buildings and other structures, combined with inadequate planned and/or reactive maintenance, reduced CWP budget and limited capital programme.  Event: Structures, specifically byelaw boards, deteriorate to an unsafe condition.  Effect: Potential serious injury to a member of the public, or member of staff; disruption to service delivery/performance; financial loss; reputational damage as a result of legal action and/or negative publicity.	mpact 8	Byelaw boards may deteriorate over time with lack of preventative maintenance. They may become unsound and present a health and safety risk.  External contractors have assessed three boards as needing to be replaced.  The boards are monitored on a regular basis and defects are reported to City Surveyor's (CSD) Facilities Management Team to address.  The CWP has not allocated any money for this issue for the 2023/24 financial year, therefore CSD do not have the resources to carry out necessary works.  In the interim, local staff do remove any unsafe byelaw boards themselves.  We continue to work with City Surveyor's to resolve service delivery issues.  26 Apr 2023	Impact 6	31-Mar-2024	

	1 description Latest Note	Latest Note Date	Due Date
Andy Thwaites	or byelaw boards, report on condition move any which become unsound.  Byelaw boards are monitored on a regular basis. Any which become unsafe are removed.	25-Apr-2023	31-Mar-2024
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Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Scot	ore R	tisk Update and date of update	Target Risk Rating & S	Score	Target Date/Risk Approach	Flight path
ENV-NE-AC 005 Tree Diseases and Other Pests  Page 2 Feb-2022 A wly Thwaites	Effect: Staff and other individuals suffer severe long-term health effects; service capability disrupted; damage to corporate reputation; increased costs for reactive maintenance.	Impact	for in lin  A D W ex  Tribot ar  O A to no	We accept that we cannot reduce this risk or the foreseeable future, but we have put in place a range of reasonable measures to mit the effects as far as we can.  An action plan is in place for Lyme Disease, including adjustments to staff work schedules to reduce the risk of exposure.  Tick/Lyme Disease information cards have een produced for volunteers, contractors and visitors to Ashtead Common.  DPM is endemic and widespread at ashtead Common but appears to be subject to natural controls which have suppressed umbers.  5 Apr 2023	Impact	6	Accept	

Action no, Title,	Action description			Latest Note Date	Due Date
		The Commons' Tree Safety Policy is reviewed every three years: next due in July 2024. The local site risk map is reviewed annually: next due in June 2023.	Andy Thwaites	25-Apr-2023	30-Jun-2023
ENV-NE-AC 005f Risk review	Keep risk under regular review.	The situation is kept under review and further measures will be implemented if and when they become necessary.	Andy Thwaites	26-Apr-2023	30-Jun-2023

Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & So	Score	Risk Update and date of update	Target Risk Rating &	Score	Target Date/Risk Approach	Flight path
ENV-NE-AC 006 Climate and weather 24-Feb-2022 Andy Thwaites	Causes: Climate change causes severe wind, drought or floods to occur more frequently. Event: More frequent and severe storms or fires at Ashtead Common.  Effect: Injury or death to staff, visitors, contractors and volunteers; damage/loss of rare/fragile habitats and species; service capability disrupted; temporary site closures; increased demand for staff resources to respond to incidents and maintain site safety; increased costs for reactive management.	Impact	6	Fire is by far the biggest risk to Ashtead Common. Although a number of measures are taken to manage the impact of this risk, we are unable to reduce the likelihood of it occurring.  25 Apr 2023	Impact	6	Accept	

Action no,	Action description	Latest Note		Latest Note Date	Due Date
V-NE-AC Was Fire management		Major emergency plan produces were shared with Surrey Fire and Rescue in May 2022. This will next be done in May 2024, unless changing circumstances require an interim review.	Andy Thwaites	25-Apr-2023	31-May-2024
ENV-NE-AC 006b Storms	Storm monitoring & management and closure policies are in place and are linked to high staff awareness and training	The site continues to monitor and respond to warnings of extreme weather.	Andy Thwaites	26-Apr-2023	31-Mar-2024
ENV-NE-AC 006c Climate change	Understand the potential impacts of climate change on Ashtead Common. Engage in climate change research and debate.	Ongoing research and dialogue continues.	Andy Thwaites	26-Apr-2023	31-Mar-2024

Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & S	Score	Risk Update and date of update	Target Risk Rating & S	Score	Target Date/Risk Approach	Flight path
Page 29-May-2022 Andy Thwaites	Cause: Polluted water poured into road drain; misconnection into the surface water system from other utilities.  Effect: Toxins and/or biohazards introduced into the watercourse threatening the health of people and animals; damage/loss of rare/fragile habitats and species; adverse local media coverage.	Impact	6	Thames Water identified and corrected nine misconnections during summer 2022 and there have been noticeably fewer pollution instances since.  Designs have been produced for a reedbed filtration system that could remove contaminants (although this would be expensive to create). However, in light of the recent apparent improvements, we will gather baseline data over the coming year to assess whether such a system would still be beneficial.  The Rye Brook is regularly monitored, including kick sampling and measurement of phosphate levels.  26 Apr 2023	Impact	2	31-Mar-2031 Reduce	

Action no, Title,	Action description			Latest Note Date	Due Date
		During 2023, we will gather baseline data to assess whether progressing the project to construct a reedbed filtration system is still required, in view of the apparent improvements seen in summer 2022.	Andy Thwaites	26-Apr-2023	31-Dec-2023

Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score	Risk Update and date of update	Target Risk Rating & S	core	Target Date/Risk Approach	Flight path
ENV-NE-AC 001 Budget reduction and income loss 24-Feb-2022 Andy Thwaites	Cause: Potential reductions in budget and income.  Event: The City of London reduces its budget for Ashtead Common, or external funding is reduced.  Effect: Financial failure; failure of key services; loss of staff; failure to maintain habitats on site; reduction in the ability to manage threats; significant reduction in service to users; reputational damage.	Impact 4	This risk remains low for Ashtead Common. The need for an additional member of staff for Ashtead Common has been identified, funded and the post is now filled.  Additional Countryside Stewardship funding has been secured for the next ten years. Therefore, the current likelihood of this risk occurring is 'unlikely'.  26 Apr 2023	Impact	4	Accept	
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Action no, T <del>itl</del> e,	Action description			Latest Note Date	Due Date
V-NE-AC 001a Risk review	Keep risk under regular review.	1 &	Andy Thwaites	26-Apr-2023	31-Dec-2023

Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score	Risk Update and date of update	Target Risk Rating & Score	Target Date/Risk Approach	Flight path
action by	Cause: The emergency services (e.g. Fire Brigade or Ambulance Service) undertake industrial action.  Event: Emergency services are not available/or are slow to respond to incidents at Ashtead Common.  Effect: Reduced ability to control wildfires; lack of urgent medical assistance for injured persons. Increased possibility of injury or death to staff, visitors, contractors and volunteers; damage/loss of rare/fragile habitats and species; service capability disrupted; temporary site closures; damage to CoL property; increased demand for staff resources to respond to incidents and maintain site safety.	Impact 3	Should the emergency services take industrial action, contingency plans will be implemented to minimise the impact of this risk. We accept the risk at its current level as we are doing everything possible to mitigate the impact, but the likelihood of the risk occurring is beyond our control.  Fire Management and Habitat Management Plans include appropriate contingency measures. In the event of industrial action by the ambulance service, high-risk activities such as tree-climbing would be paused and planned events would be assessed and modified, postponed or cancelled as appropriate should continuing with them be deemed unsafe.  Staff monitor reports of potential or confirmed industrial action and implement relevant contingency plans as necessary.  Staff are fully conversant with the relevant local plans and the CoL's Fire Safety 'Industrial Action Contingency Advice' document as it applies to the site.	Impact 3		
10-Feb-2023			26 Apr 2023		Accept	
Andy Thwaites						

Action no, Title,	Action description			Latest Note Date	Due Date
	1 11 1	5	Andy Thwaites	26-Apr-2023	31-Mar-2024

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management	Habitat Fire Action Plan.	Maps within the 'Major Emergency Plan' will help in a slow response/unfamiliar fire crew/army reserves scenario.  Proactive work to manage firebreaks and residential boundaries to increase the resilience of Ashtead Common to wildfire will also help in a slow/no response scenario.  Staff are conversant with the content of the CoL's 'Industrial Action Contingency Advice' document as it applies to their site.			
ENV-NE-AC 010b Events and high-risk activities	Assess safety of planned events and high-risk activities.	High-risk activities such as tree-climbing would be paused or have additional controls applied should the emergency services be unavailable.  All planned events are risk-assessed to ensure appropriate controls are in place to address fire, health and safety, and other risks. If it is considered that it would be unsafe to proceed with an event in the absence of external emergency service availability, a decision would be taken to modify, postpone or cancel as appropriate.	Andy Thwaites	26-Apr-2023	31-Mar-2024

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## **Burnham Beeches and Stoke Common Risk Register**

**Report Author:** Joanne Hill **Generated on:** 02 May 2023



Rows are sorted by Risk Score

Creation date,	Risk Description (Cause, Event, Impact)	Current Risk Rating & So	Score	Risk Update and date of update	Target Risk Rating &	Score	Target Date/Risk Approach	Flight path
V-NE- PSC 002 Damage to sixes O	Cause: Burnham Beeches was damaged during the COVID-19 pandemic due to higher than usual visitor numbers. Even though numbers have since returned to 'normal' levels, the site is still subject to ongoing degradation.  Event: Long-term environmental damage, with a particular focus on protected landscapes, especially Burnham Beeches which is a Site of Special Scientific Interest (SSSI) and a Special Area of Conservation (SAC) and not designed for such high visitor numbers.  Effect: Ecological and environmental damage; negative press coverage; loss of grants related to conservation; increased spend required to maintain the sites/mitigate damage.	Impact	16	Visitor numbers have returned to more normal/pre-COVID levels, although they have still been elevated at times in the last 12 months and impact of 'normal use' may lead to ongoing site damage and degradation. Seasonal area/path restrictions have now become part of normal business to protect the SAC but more work is required in order to reduce the impact of the risk.  28 Apr 2023	Impact	12	30-Sep-2023 Reduce	

Action no, Title,	Action description			Latest Note Date	Due Date
ENV-NE- BBSC 002a Car parking	Prevent damage from car parking on surrounding roads and land.	Four miles of permanent parking restrictions are still expected to be installed by Buckinghamshire Council around Burnham Beeches. Officers have been in contact with Buckinghamshire Council who have asked us to contact them again after May 2023.		28-Apr-2023	30-Sep-2023
ENV-NE- BBSC 002b Action Plan		7 8 1 7 7	Read	28-Apr-2023	30-Sep-2023

ENV-NE-BBSC 005 Tree Diseases and Other Pests  Cause: Inadequate biosecurity, purchase or transfer of infected plants, soil and animals. 'Natural' spread of pests and diseases e.g. Oak Processionary Moth, and lack of funding to deliver requirements of the OPM Plant Health Notice.  Event: OPM spreads further throughout the site and inability to carry out legal requirements.  Effect: Potential consequences of noncompliance with legal requirements; reputational damage; temporary site/area closures; increased costs for reactive maintenance; health and safety risk to staff and visitors.  EVALUATE: Inadequate biosecurity, purchase or transfer of infected plants, soil and animals. 'Natural' spread of pests and diseases e.g. Oak Processionary Moth, and lack of funding there is nothing more we can do to reduce the risk. We will continue to undertake all reasonable actions to keep the situation under control as far as we are able.  24-Feb-2022  Martin Hartup  Ma	Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Scor	ore	Risk Update and date of update	Target Risk Rating &	Score	Target Date/Risk Approach	Flight path
	BBSC 005 Tree Diseases and Other Pests 24-Feb-2022 Martin Hartup	transfer of infected plants, soil and animals. 'Natural' spread of pests and diseases e.g. Oak Processionary Moth, and lack of funding to deliver requirements of the OPM Plant Health Notice.  Event: OPM spreads further throughout the site and inability to carry out legal requirements.  Effect: Potential consequences of noncompliance with legal requirements; reputational damage; temporary site/area closures; increased costs for reactive maintenance; health and safety risk to staff	Literbood		Common and still spreading there. OPM has also been discovered in trees adjacent to Burnham Beeches and so is likely to spread there also in the coming years.  Without additional funding there is nothing more we can do to reduce the risk. We will continue to undertake all reasonable actions to keep the situation under control as far as we are able.	9	16	Accept	

Action no,	Action description	Latest Note A		Latest Note Date	Due Date
ENV-NE- BBSC 005a Staff training		Ongoing. Training needs reviewed at regular team meetings, and proactively promoted via Departmental Health and Safety Group and relevant corporate boards.  Needs are also reviewed at 6 monthly local Health and Safety meetings.	Martin Hartup	28-Apr-2023	31-Jan-2024
ENV-NE- BBSC 005b Inspections	Annual tree inspections undertaken by qualified personnel.	Ongoing. Inspections continue on a scheduled basis or if and when the need arises.	Martin Hartup	28-Apr-2023	31-Mar-2024
ENV-NE- BBSC 005d Biosecurity	Measures in place for staff, volunteers and contractors including public messages	Ongoing biosecurity actions and implementation of biosecurity policy.	Martin Hartup	28-Apr-2023	31-Mar-2024
ENV-NE- BBSC 005e Tree Safety Policy	Review The Commons' Tree Safety Policy tri-annually and the local site policy annually.	The Commons' Tree Safety Policy is reviewed every three years: next due in July 2024.  Burnham Beeches and Stoke Common local site policy is reviewed annually: next due in July 2023.	Martin Hartup	28-Apr-2023	01-Aug-2024
ENV-NE-	Actions for the management of OPM at Stoke	An OPM management plan was developed and implemented for Stoke Common in summer 2021 in	Martin	28-Apr-2023	31-Mar-2024

BBSC 005f OPM at Stoke	line with Natural England advice/restriction and Forestry Commission requirements - survey and nest removal is undertaken as required.	Hartup	
Common	A similar plan may be required for the even more sensitive Burnham Beeches SAC if OPM spreads as expected. We are keeping the situation under review.		

Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Sc	core	Risk Update and date of update	Target Risk Rating &	Score	Target Date/Risk Approach	Flight path
Page  Page  Martin Hartup	Causes: The Rural Payment Agency (RPA) has altered the administration of the BE6 grant for work on trees.  Event: Reduction in direct grant available from the Rural Payments Agency (RPA) to deliver agricultural/conservation related services.  Effect: Reduction in the amount of grant received from the RPA; cessation of agricultural/conservation services; reduction in income, direct and indirect; reduction/loss of biodiversity (legal implications); restrictions on recreational access due to reduction/cessation of grazing activities.	Impact		RPA is reassessing agreed grant. There is the potential to reduce it by 50% which would cause a significant funding gap.  Our initial appeal against the RPA's alteration of administration of the BE6 grant for work on trees was declined. We continue to challenge this and further decisions from the RPA. In view of this situation we have had to set our 2023/24 budget based on the minimum BE6 payments.  Therefore, the current risk remains at Red (16) to reflect the significant financial impact this could cause. We have adjusted our target risk score to Amber 12 (Possible/major) to reflect the above outcomes.  28 Apr 2023	Impact	12	31-Mar-2024 Reduce	

Action no, Title,	Action description		Latest Note Date	Due Date
BBSC 007c CSS Payment Changes	England (NE) and agree any possible mitigation to limit the negative impacts of proposed changes in payments for the existing Countryside Stewardship Scheme	Martin Hartup; Helen Read	28-Apr-2023	31-Mar-2024

Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score	Risk Update and date of update	Target Risk Rating & Score	Target Date/Risk Approach	Flight path
ENV-NE-BBSC 009 Maintenance of buildings and other structures  Quantin Hartup Martin Hartup  51	Cause: Poor condition of buildings and other structures, combined with inadequate planned and/or reactive maintenance, reduced CWP budget and limited capital programme.  Event: Structures become unsafe or unusable.  Effect: Potential serious injury to a member of the public, or member of staff; disruption to service delivery/performance; financial loss; reputational damage as a result of legal action and/or negative publicity.	Impact 16	The key issues at Burnham Beeches include the large, wooden corporate image (byelaw) boards located across the site.  The local team has undertaken an update of the previous audit of byelaw boards which was carried out by the City Surveyor's Department (CSD) in 2019. Since this audit, a further board has been found defective and removed and others need urgent attention.  Concerns about the general situation are raised at quarterly client liaison meetings with CSD. We continue to work with CSD to resolve service delivery issues.	Impact	31-Mar-2024 Reduce	

Action no, Title,	Action description			Latest Note Date	Due Date
ENV-NE- BBSC 009a Ongoing monitoring		5	Martin Hartup	28-Apr-2023	31-Mar-2024

Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score	Risk Update and date of update	Target Risk Rating & Score	Target Date/Risk Approach	Flight path
ENV-NE-BBSC 001 Budget reduction and income loss  Page Feb-2022 Martin Hartup	Cause: 12% budget reduction with in-year unidentified savings. Loss of income from car parking, filming and other funding streams.  Event: Fewer visitors and less filming interest.  Effect: Inability to meet approved budgets; reduction in essential repairs and maintenance; reduction in key services; failure to meet business plan objectives; reputational damage.	Impact 12	Whilst the 12% budget reductions were addressed in 2021/22 and through stage one of the Natural Environment Division's Target Operating Model process, there are still unidentified savings listed in the budget until April 2024.  The Rural Payment Agency (RPA) has proposed a change in the value of the Countryside Stewardship Scheme grant at Burnham Beeches, reducing it by around 50% due to a change in the claim rules after the agreement was signed. See ENV-NE-BBSC 007 for details.	Impact	31-Mar-2024 Reduce	

Action no, Title,	Action description		Latest Note Date	Due Date
ENV-NE- BBSC 001a Budget monitoring	1 0	Budgets are kept under continual review and reported quarterly as part of the budget forecast process. We continue to liaise with our Chamberlain's Business Partners on potential solutions to this matter.	28-Apr-2023	31-Mar-2024

Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score	Risk Update and date of update	Target Risk Rating & Score	Target Date/Risk Approach	Flight path
Page 14-Feb-2022 Martin Hartup	Cause: Pressure on Planning Authorities to meet housing targets. Failure to monitor and challenge housing and other development plans. Lack of partnership working with Planning Authorities and inclusion in Local Development Plans. Lack of resources to employ specialist support or carry out necessary monitoring/research.  Event: Large housing or other developments on land affecting Burnham Beeches and Stoke Common.  Effect: Increase in visitor numbers and general recreation pressure; potential decline in biodiversity due to disturbance and habitat quality; increased air, light and noise pollution; decrease in water availability; increased hydrological pollution risk; increase in traffic on local road network.	Impact 12	Ongoing - local plans continue to be developed and are scrutinised and commented on when required. Staffing capacity is currently able to manage the volume of work associated with commenting on local plans.  The Buckinghamshire Council Local Plan, whilst not yet produced, has established clear policies to protect the SAC at Burnham Beeches with an agreed mitigation strategy and funding mechanism for its delivery. The Slough Borough Council plan is still very much a work in progress but, again, some mitigation has already been agreed for specific development and funding identified to help protect Burnham Beeches from the impacts of increased development.  Risks, however, still remain.  28 Apr 2023	Impact 12	Accept	

Action no, Title,	Action description		Latest Note Date	Due Date
BBSC 004a Local authorities/Cou nties Local		Helen Read	28-Apr-2023	31-Mar-2024

ENV-NE- BBSC 004b Monitoring of impacts	Active monitoring of air pollution where possible. Active monitoring of environmental impacts where possible. Undertake research where appropriate and where resources allow.	' ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' '	Helen Read	28-Apr-2023	30-Sep-2023
ENV-NE- BBSC 004e Monitor success	Monitor the success of the funded Ranger posts.	Establish monitoring programmes to measure the success of the two funded Ranger posts to deliver s106 and SAMMS commitments. This will involve annual SAMMS 106 reports to the relevant parts of Buckinghamshire Council and Slough Borough Council on how the funds have been spent, and the EF&CC will be kept updated throughout the year.	Hartup	28-Apr-2023	31-Mar-2024

Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating &	& Score	Risk Update and date of update	Target Risk Rating &	Score	Target Date/Risk Approach	Flight path
ENV-NE- BBSC 006 Climate and Weather 24-Feb-2022 Martin Hartup	Cause: Severe wind events, prolonged precipitation or restricted precipitation. May be climate change influenced.  Event: Severe weather/climate impacts; fire, flood and storm events (potentially increasing in frequency).  Effect: Service capability disrupted; increased demand for staff resources to respond to incidents and maintain site safety; loss of species, temporary site closures and associated access; increased costs for reactive management; injury or death to staff, visitors, contractors and volunteers; damage/loss of rare/fragile habitats and species.	Impact	12	Work on site continues to mitigate the impact of extreme weather events and this is monitored on an ongoing basis. We accept the current level of risk.  28 Apr 2023	Impact	12	Accept	

	Tare Tragite macroate and species.						
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tion no,	Action description	Latest Note				Latest Note Date	Due Date
ENV-NE- ESC 006a Fire management	Review and update plan annually. Habitat fire management and monitoring policies and plans are in place and link to staff training and local emergency services.	services.	e Comm	s are currently under construction in collaborate non agreed with Buckinghamshire Fire and Red drills.	Martin Hartup	28-Apr-2023	31-Mar-2024
ENV-NE- BBSC 006b Storms	Storm monitoring & management and closure policies are in place across the sites and are linked to high staff awareness and training.	The site continues to mor	nitor and	respond to warnings of extreme weather.	Martin Hartup	28-Apr-2023	31-Mar-2024

Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Sco	core	Risk Update and date of update	Target Risk Rating & S	Score	Target Date/Risk Approach	Flight path
ENV-NE-BBSC 008 Pollution	Cause: Continual pollution of Burnham Beeches as a result of inadequate sewerage provision for existing development in the local area, which is managed by Thames Water. Event: Sewage escapes into the watercourse running into Burnham Beeches after heavy rain. Effect: Pollution of the watercourses running into Burnham Beeches and associated degradation of the environment; potential reputational damage.	Impact	8	Thames Water is looking at the whole sewer system in Farnham Common with a view to carrying out work to resolve the issue across the whole area. We are engaging in the process, which so far has largely been fact finding, prior to drawing up detailed proposals. Thames Water have now stated that they will present detailed proposals by December 2023.  We are unable to reduce the possibility of the risk occurring but continue to report any issues to the Environment Agency and Thames Water.  28 Apr 2023	Impact	8	Accept	

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Action no, Title,	Action description			Latest Note Date	Due Date
NE-ENV- BBSC 008a Surveys to monitor impact	pollution on indicator species.	BBSC has commissioned a project to compare the mosses and liverworts of the polluted stream with those of another local unpolluted stream. Thames Water is funding an equivalent project on freshwater invertebrates, the first part of the field work for which has been completed. Surveys and associated reports have been completed. Thames Water will continue to support monitoring activity and have committed to propose a solution by December 2023.	Helen Read	28-Apr-2023	31-Dec-2023

Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score	Risk Update and date of update	Target Risk Rating & Score	Target Date/Risk Approach	Flight path
ENV-NE-BBSC 011 Industrial action by emergency services  Page 160  10-Feb-2023 Martin Hartup	Cause: The emergency services (e.g. Fire Brigade or Ambulance Service) undertake industrial action.  Event: Emergency services are not available/slow to respond to incidents at Burnham Beeches and Stoke Common.  Effect: Inability to control wildfires; lack of urgent medical assistance for injured persons. Increased possibility of injury or death to staff, visitors, contractors and volunteers; damage/loss of rare/fragile habitats and species; service capability disrupted; temporary site closures; damage to CoL property; increased demand for staff resources to respond to incidents and maintain site safety; increased costs for reactive management.	Impact 3	Should the emergency services take industrial action, contingency plans will be implemented to minimise the impact of this risk. We accept the risk at its current level as we are doing everything possible to mitigate the impact, but the likelihood of the risk occurring is beyond our control.  Fire Management and Habitat Management Plans include appropriate contingency measures. In the event of industrial action by the ambulance service, high-risk activities such as tree-climbing would be paused and planned events would be assessed and modified, postponed or cancelled as appropriate should continuing with them be deemed unsafe.  Staff monitor reports of potential or confirmed industrial action and implement relevant contingency plans as necessary.  Staff are fully conversant with the relevant local plans and the CoL's Fire Safety 'Industrial Action Contingency Advice' document as it applies to the site.  28 Apr 2023	Impact 3	Accept	

Action no, Title,	Action description		Latest Note Date	Due Date
ENV-NE- BBSC 011a	Implement appropriate controls within the Fire Management Plan and The Commons	Martin Hartup	28-Apr-2023	31-Mar-2024

Fire management	Habitat Fire Action Plan.	Maps within the 'Emergency Action Plan' will help in a slow response/unfamiliar fire crew/army reserves scenario.			
		Proactive work to manage firebreaks and residential boundaries to increase the resilience of Burnham Beeches and Stoke Common to wildfire will also help in a slow/no response scenario.			
		A water bowser. And other fire control equipment (beaters and back pack is available on site for use by staff to damp down ground after a work fire or support of fire service.(not used for fire-fighting).			
		Staff are conversant with the content of the CoL's 'Industrial Action Contingency Advice document as it applies to their site.			
ENV-NE- BBSC 011b Events and		High-risk activities such as tree-climbing would be paused or have additional controls applied should the emergency services be unavailable.	Martin Hartup	28-Apr-2023	31-Mar-2024
high-risk activities		All planned events are risk-assessed to ensure appropriate controls are in place to address fire, health and safety, and other risks. If it is considered that it would be unsafe to proceed with an event in the absence of external emergency service availability, a decision would be taken to modify, postpone or cancel as appropriate.			

Page 161

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# Coulsdon & Other Commons Risk Register

**Report Author:** Joanne Hill **Generated on:** 02 May 2023



#### Rows are sorted by Risk Score

Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score	Risk Update and date of update	Target Risk Rating & Score	Target Date/Risk Approach	Flight path
EV-NE- Chintenance of buildings and other Suctures	Cause: Poor condition of buildings and other structures, combined with inadequate planned and/or reactive maintenance, reduced CWP budget and limited capital programme, Event: Structures deteriorate to an unsafe condition.  Effect: Potential serious injury to a member of the public, or member of staff; disruption to service delivery/performance; financial loss; reputational damage as a result of legal action and/or negative publicity.	Impact 16	The key issues at Coulsdon Common are:  • The large, wooden corporate image (byelaw) boards located across the site, and • The cattle grids on Farthing Downs.  The local team has undertaken an update of the previous audit of byelaw boards which was carried out by the City Surveyor's Department (CSD) in 2019. Since this audit, a further eight boards have been found defective and removed. In the last five years, there have been three nearmisses where boards have collapsed.  For the cattle grids, the CSD should undertake annual inspections but these have not been carried out for some years. The local team monitors the grids and reports any concerns to CSD.  Concerns about the general situation are raised at quarterly client liaison meetings	Impact 12	30-Jun-2023	

15-Jun-2022 Allan Cameron			with CSD. Issues continue to be raised monthly with the Assistant Property Facilities Manager (APFM) but there has not been a meeting with them for approximately 18 months.  We continue to work with City Surveyor's to resolve service delivery issues.  26 Apr 2023			Reduce		
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Action no, Title,	Action description			Latest Note Date	Due Date
ENV-NE-COC 0 <del>09</del> a Monitoring	Monthly site infrastructure checks.	Continual monitoring of byelaw boards, cattle grids and other structures.	Allan Cameron	26-Apr-2023	30-Jun-2023

ENV-NE-COC 002 Damage to sites  Cause: The sites are more popular than in previous years, linked to people enjoying local natural environments which are free of charge. Increased population and housing in the local area.  Event: Long-term environmental damage, with a particular focus on protected landscapes and Sites of Special Scientific Interest (SSSI) which are not designed for such high visitor numbers.  Effect: Ecological and environmental damage; loss of grants related to preservation; increased spend	Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score	Risk Update and date of update	Target Risk Rating & Score	Target Date/Risk Approach	Flight path
required to maintain sites/mitigate damage.	COC 002 Damage to sites  24-Feb-2022 Allan Cameron	previous years, linked to people enjoying local natural environments which are free of charge. Increased population and housing in the local area.  Event: Long-term environmental damage, with a particular focus on protected landscapes and Sites of Special Scientific Interest (SSSI) which are not designed for such high visitor numbers.  Effect: Ecological and environmental damage; reputational damage; loss of grants related to preservation; increased spend	Likelmood	numbers and general population growth which we cannot influence. Therefore, we accept that we cannot reduce the possibility of the risk occurring. However, we continue to encourage people to use the sites responsibly.	De le	Accept	

tion no,	Action description	Latest Note		Latest Note Date	Due Date
ENV-NE-COC a Establish a Conservation Ranger post	post.	We will recruit a Conservation Ranger who will monitor development applications and undertake detailed ecological surveys. Recruitment has been delayed due to the ongoing TOM Phase Two process.	Allan Cameron	26-Apr-2023	30-Sep-2023

ENV-NE- COC 004 Local Planning Planning Planning Siack of partnership working with Planning Authorities and inclusion in Local Development Plans; lack of resources to employ specialist support or carry out necessary monitoring/research. Event: Large housing or other developments on land affecting the sites. Effect: Increase in visitor numbers and general recreation pressure; potential decline in biodiversity due to disturbance and habitat quality; increase in air, light and noise pollution; decrease in water availability; increase in air, light and noise pollution; decrease in water availability; increase in example of the pollution of the pollution in the pollution in the pollution in the pollution in the pollution; decrease in water availability; increase in example pollution; decrease in water availability; increase in example pollution; decrease in value and pollution in the pollution in th	Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating &	Score	Risk Update and date of update	Target Risk Rating & Score	Target Date/Risk Approach	Flight path
	COC 004 Local Planning Issues  24-Feb-2022 Allan Cameron	meet housing targets; failure to monitor and challenge housing and other development plans; lack of partnership working with Planning Authorities and inclusion in Local Development Plans; lack of resources to employ specialist support or carry out necessary monitoring/research.  Event: Large housing or other developments on land affecting the sites.  Effect: Increase in visitor numbers and general recreation pressure; potential decline in biodiversity due to disturbance and habitat quality; increase in air, light and noise pollution; decrease in water availability; increased hydrological pollution risk;	Est.	8	are scrutinised and commented on by officers when required. Staffing capacity is currently unable to manage the volume of work associated with commenting on local plans.  However, we now have funding to recruit a full-time Conservation Ranger which will provide greater capacity for responding to these issues and enable us to be more proactive.	Impact		4

Mion no,	Action description	Latest Note		Latest Note Date	Due Date
ENV-NE-COC 004c Establish a Conservation Ranger post	post.	We will recruit a Conservation Ranger who will monitor development applications. Recruitment has been delayed due to the ongoing TOM Phase Two process.	Allan Cameron	26-Apr-2023	30-Sep-2023
	Seek advice and support from colleagues in the Planning and Development Division.	Investigate options for obtaining support and advice from colleagues in the Environment Department's Planning and Development Division.	Allan Cameron	26-Apr-2023	31-Aug-2023

Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score	Risk Update and date of update	Target Risk Rating & Score	Target Date/Risk Approach	Flight path
Diseases and Other Pests 24-Feb-2022	Cause: Inadequate biosecurity; purchase or transfer of infected plants, soil and animals. 'Natural' spread of pests and diseases from neighbouring areas e.g. Oak Processionary Moth (OPM) and foot and mouth disease. Event: Sites become infected by animal, plant or tree diseases. Effect: Service capability disrupted; ineffective use of staff resources; reputational damage; loss of species; temporary site closures and associated access; increased costs for reactive maintenance; threat to existing conservation status of sites, particularly those with woodland habitats.	Impact	Ash Dieback: Cost of future Ash Dieback management is unknown; local risk budgets are not resourced sufficiently to meet costs. Local tree safety inspections deal with immediate risk, but we are unable to predict with any certainty the condition of trees and their likelihood of infection over the next two to three years.  26 Apr 2023	Impact	31-Mar-2025 Reduce	

Ation no, Pile,	Action description	Latest Note		Latest Note Date	Due Date
NV-NE-COC Da Staff training	Ensure staff training is kept updated to enable timely identification of pest and knowledge of correct treatment/ prevention.	Ongoing. Training needs are reviewed at regular team meetings, and proactively promoted via the Department Health & Safety Group and relevant corporate boards.  Needs are also reviewed at six-monthly divisional Health and Safety meetings.	Allan Cameron	26-Apr-2023	31-Mar-2024
ENV-NE-COC 005b Inspections	Annual tree inspections undertaken by qualified personnel.	ng. Inspections continue on a scheduled basis or if and when the need arises.  Allan Came		26-Apr-2023	31-Mar-2024
ENV-NE-COC 005c Partnerships	Active involvement with leading partners such as Forestry Commission and Natural England	ngoing. Inspections continue on a scheduled basis or if and when the need arises.  Alla Can		26-Apr-2023	31-Mar-2024
ENV-NE-COC 005d Biosecurity	Measures in place for staff, volunteers and contractors including public messages	nis is ongoing  All Car		26-Apr-2023	31-Mar-2024
	Review The Commons' Tree Safety Policy tri-annually.	The Commons' Tree Safety Policy is reviewed every three years. It was last reviewed in July 2021 and will be reviewed again in July 2024.	Allan Cameron	26-Apr-2023	01-Aug-2024

Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score	e Risk Update and date of update	Target Risk Rating & Score	Target Date/Risk Approach	Flight path
Pag-Jun-2022 Allan Cameron	Cause: Continual pollution of Coulsdon Common through defective drainage infrastructure owned by Surrey County Council and managed by Thames Water. Event: High rainfall leads to prolonged periods of pollution from two soakaways located on Stites Hill Road. Contamination of site with sanitary toxic and foul waste. Effect: Health and safety implications for visitors; reduction in quality of land within a National Nature Reserve (NNR); reputational damage and potential legal liability for the CoL.		The Head Ranger attends meetings of the local multi-agency Flood Action Group where this is a standing agenda item.  The Comptroller and City Solicitor's Department is involved with partner organisations and liability for the pipe structures and water pipes in the area has been ascertained. The next step is for the legal teams of each party to discuss mitigation.  We are unable to reduce the possibility of the risk occurring but report any issues to the Environment Agency and Thames Water.  26 Apr 2023	Impact 8	Accept	

Action no, Title,	Action description	Latest Note		Latest Note Date	Due Date
	Attend meetings of the local Flood Action Group.	Head Ranger represents the CoL at meetings of the local Flood Action Group which are held periodically (every 2-3 months).	Allan Cameron	26-Apr-2023	30-Jun-2023
	liabilities.		Allan Cameron	26-Apr-2023	31-Dec-2023

Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & So	Score	Risk Update and date of update	Target Risk Rating & S	Score	Target Date/Risk Approach	Flight path
ENV-NE-COC 001 Budget reduction and income loss  Page Feb-2022 Allan Cameron	Cause: Potential reduction in budget and income: reduction of income from car park charging; loss of income from rental properties.  Event: Reduced budget and income.  Effect: Potential staff reductions and inability to provide key services; financial failure; failure to achieve strategic objectives; significant reduction in service to users; reputational damage.	Impact	6	The Target Operating Model process is yet to be concluded and associated budget reductions are yet unknown. This is beyond our control and we are unable to reduce the risk in the foreseeable future.  However, a Countryside Stewardship grant has been secured until 2026 and two vacant properties have been rented out, one with a long-term tenant until 2027, and the other on a rolling residential annual contract. These help to offset previous budget cuts.  Car parking income was lower than estimated during 2022/23 (52% of estimated levels).  26 Apr 2023	Impact	6	Accept	

Action no, Title,	Action description	Latest Note		Latest Note Date	Due Date
ENV-NE-COC 001a Risk review	Keep risk under regular review.	This risk is kept under regular review.	Allan Cameron	26-Apr-2023	31-Mar-2024

ENV-NE-COC 006 Climate and Weather 24-Feb-2022 Allan Cameron  Effect: Service capability disrupted; increased demand for staff resources to respond to incidents and associated access; increased costs for reactive management; injury or death to staff, visitors, contractors and volunteers; damage/loss of prac/fregila bability, and one circums.	Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating &	Score	Risk Update and date of update	Target Risk Rating & S	Score	Target Date/Risk Approach	Flight path
Tare/riagne natitats and species.	COC 006 Climate and Weather 24-Feb-2022	precipitation or restricted precipitation. May be climate change influenced  Event: Severe weather/climate impacts; fire, flood and storm events (potentially increasing in frequency).  Effect: Service capability disrupted; increased demand for staff resources to respond to incidents and maintain site safety; loss of species; temporary site closures and associated access; increased costs for reactive management; injury or death to staff, visitors,	Impact	6	continues to mitigate the impact of extreme weather events should they happen.	E Se	6	Accept	

Otion no,	Action description	Latest Note		Latest Note Date	Due Date
ENV-NE-COC OBa Fire management	Review and update Fire Management plan biannually. Habitat fire management and monitoring policies and plans in place which link to staff training and local emergency services.	Detailed fire maps have been completed and shared with the fire services. The next review of the Fire Management Plan will be undertaken in 2024.	Allan Cameron	26-Apr-2023	30-Apr-2024
ENV-NE-COC 006b Storms	Storm monitoring and management and closure policies are in place at the site and linked to high staff awareness and training.	The sites continue to monitor and respond to warnings of extreme weather.	Allan Cameron	26-Apr-2023	31-Mar-2024
ENV-NE-COC 006c Climate change	Understand the potential impacts of climate change on Coulsdon Common. Engage in climate change research and debate.	Ongoing research and dialogue	Allan Cameron	26-Apr-2023	31-Mar-2024

Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score	Risk Update and date of update	Target Risk Rating & Score	Target Date/Risk Approach	Flight path
ENV-NE-COC 011 Industrial action by emergency services  Page 171	Causes: The emergency services (e.g. Fire Brigade or Ambulance Service) undertake industrial action.  Event: Emergency services are not available/slow to respond to incidents at Coulsdon and other Commons.  Effect: Inability to control wildfires; lack of urgent medical assistance for injured persons. Increased possibility of injury or death to staff, visitors, contractors and volunteers; damage/loss of rare/fragile habitats and species; service capability disrupted; temporary site closures; damage to CoL property; increased demand for staff resources to respond to incidents and maintain site safety; increased costs for reactive management.	Impact 3	Should the emergency services take industrial action, contingency plans will be implemented to minimise the impact of this risk. We accept the risk at its current level as we are doing everything possible to mitigate the impact, but the likelihood of the risk occurring is beyond our control.  Fire Management and Habitat Management Plans include appropriate contingency measures. In the event of industrial action by the ambulance service, high-risk activities such as tree-climbing would be paused and planned events would be assessed and modified, postponed or cancelled as appropriate should continuing with them be deemed unsafe.  Staff monitor reports of potential or confirmed industrial action and implement relevant contingency plans as necessary.  Staff are fully conversant with the relevant local plans and the CoL's Fire Safety 'Industrial Action Contingency Advice' document as it applies to the site.	Impact 3		
10-Feb-2023			26 Apr 2023		Accept	
Allan Cameron						

Action no, Title,	Action description		Latest Note Date	Due Date
	1 11 1	Allan Cameron	26-Apr-2023	31-Mar-2024

management	Habitat Fire Action Plan.	where fire is a component).	ï		¥
		Maps within the 'Major Emergency Plan' will help in a slow response/unfamiliar fire crew/army reserves scenario.			
		Proactive work to manage firebreaks and residential boundaries to increase the resilience of Coulsdon Common (and other Commons) to wildfire will also help in a slow/no response scenario.			
		A water bowser is available on site for use by staff to damp down peat after a fire (not for fire-fighting).			
		Staff are conversant with the content of the CoL's 'Industrial Action Contingency Advice' document as it applies to their site. This includes ensuring the safety of livestock.			
ENV-NE-COC 011b Events and high-risk		High-risk activities such as tree-climbing would be paused or have additional controls applied should the emergency services be unavailable.	Allan Cameron	26-Apr-2023	31-Mar-2024
activities		All planned events are risk-assessed to ensure appropriate controls are in place to address fire, health and safety, and other risks. If it is considered that it would be unsafe to proceed with an event in the absence of external emergency service availability, a decision would be taken to modify, postpone or cancel as appropriate.			

Page 1/2

# West Wickham & Spring Park Risk Register

**Report Author:** Joanne Hill **Generated on:** 02 May 2023



#### Rows are sorted by Risk Score

Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score	Risk Update and date of update	Target Risk Rating & Score	Target Date/Risk Approach	Flight path
W-NE- WSP 009 Sintenance of buildings and other structures	Cause: Poor condition of buildings and other structures, combined with inadequate planned and/or reactive maintenance, reduced CWP budget and limited capital programme.  Event: Structures deteriorate to an unsafe condition.  Effect: Potential serious injury to a member of the public, or member of staff; disruption to service delivery/performance; financial loss; reputational damage as a result of legal action and/or negative publicity.	Impact 16	The key issue at West Wickham and Spring Park is the large, wooden corporate image (byelaw) boards located across the sites.  The local team has undertaken an update of the previous audit of byelaw boards which was carried out by the City Surveyor's Department (CSD) in 2019. Since this audit, further boards have been found defective and removed. In the last five years, there have been three near-misses where boards have collapsed.  Concerns about the general situation are raised at quarterly client liaison meetings with CSD. Issues continue to be raised monthly with the Assistant Property Facilities Manager (APFM) but there has not been a meeting with them for approximately 18 months. We continue to work with City Surveyor's to resolve service delivery issues.	Impact 12	30-Jun-2023	
15-Jun-2022			26 Apr 2023		Reduce	

Allan Cameron						
Action no, Title,	Action description	Latest Note			Latest Note Date	Due Date
ENV-NE- WWSP 009a Monitoring	Monthly site infrastructure checks.	Continual monitoring of byel	aw boards and other structures	Allan Cameron	26-Apr-2023	30-Jun-2023

Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score	Risk Update and date of update	Target Risk Rating & Score	Target Date/Risk Approach	Flight path
ENV-NE- WWSP 002 Damage to sites  24-Feb-2022 Allan Cameron	Cause: The sites are more popular than in previous years, linked to people enjoying local natural environments which are free of charge. Increased population and housing in the local area.  Event: Long-term environmental damage, with a particular focus on protected landscapes and Sites of Special Scientific Interest (SSSI) which are not designed for such high visitor numbers.  Effect: Ecological and environmental damage; reputational damage; loss of grants related to preservation; increased spend required to maintain sites/mitigate damage.	Impact 12	We are seeing a continual increase in visitor numbers and general population growth which we cannot influence. Therefore, we accept that we cannot reduce the possibility of the risk occurring. However, we continue to encourage people to use the sites responsibly.  26 Apr 2023	B O	Accept	

tion no,	Action description			Latest Note Date	Due Date
	post.	8 11 8	Allan Cameron	26-Apr-2023	30-Sep-2023

Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating &	Score	Risk Update and date of update	Target Risk Rating & S	Score	Target Date/Risk Approach	Flight path
ENV-NE- WWSP 004 Local Planning Issues  24-Feb-2022  Allan Cameron	Cause: Pressure on Planning Authorities to meet housing targets; failure to monitor and challenge housing and other development plans; lack of partnership working with Planning Authorities and inclusion in Local Development Plans; lack of resources to employ specialist support or carry out necessary monitoring/research.  Event: Large housing or other developments on land affecting the sites.  Effect: Increase in visitor numbers and general recreation pressure; potential decline in biodiversity due to disturbance and habitat quality; increase in air, light and noise pollution; decrease in water availability; increased hydrological pollution risk; increased traffic on local road network.	Impact	8	Local plans continue to be developed and are scrutinised and commented on by officers when required. Staffing capacity is currently unable to manage the volume of work associated with commenting on local plans.  However, we now have funding to recruit a full-time Conservation Ranger which will provide greater capacity for responding to these issues and enable us to be more proactive.  26 Apr 2023	Impact	6	31-Mar-2024 Reduce	

Adion no,	Action description	Latest Note		Latest Note Date	Due Date
ENV-NE- WWSP 004c Establish a Conservation Ranger post	Recruit to the vacant Conservation Ranger post.	We will recruit a Conservation Ranger who will monitor development applications. Recruitment has been delayed due to the ongoing TOM Phase Two process.	Allan Cameron	26-Apr-2023	30-Sep-2023
ENV-NE- WWSP 004d Collaborative working	Seek advice and support from colleagues in the Planning and Development Division.	Investigate options for obtaining support and advice from colleagues in the Environment Department's Planning and Development Division.	Allan Cameron	26-Apr-2023	31-Aug-2023

Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & S	Score	Risk Update and date of update	Target Risk Rating &	Score	Target Date/Risk Approach	Flight path
ENV-NE- WWSP 005 Tree Diseases and Other Pests  24-Feb-2022 Allan Cameron	Cause: Inadequate biosecurity; purchase or transfer of infected plants, soil and animals. 'Natural' spread of pests and diseases from neighbouring areas e.g. Oak Processionary Moth (OPM) and foot and mouth disease. Event: Sites become infected by animal, plant or tree diseases. Effect: Service capability disrupted; ineffective use of staff resources; reputational damage; loss of species; temporary site closures and associated access; increased costs for reactive maintenance; threat to existing conservation status of sites, particularly those with woodland habitats.	Impact	8	Ash Dieback: Cost of future Ash Dieback management is unknown; local risk budgets are not resourced sufficiently to meet costs. Local tree safety inspections deal with immediate risk, but we are unable to predict with any certainty the condition of trees and their likelihood of infection over the next two to three years.  26 Apr 2023	Die Pood	6	31-Mar-2025 Reduce	

ntion no,	Action description	Latest Note	Action owner	Latest Note Date	Due Date
ENV-NE- WWSP 005a Staff training		Ongoing. Training needs are reviewed at regular team meetings, and proactively promoted via the Department Health & Safety Group and relevant corporate boards.  Needs are also reviewed at six-monthly divisional Health and Safety meetings	Allan Cameron	26-Apr-2023	31-Mar-2024
ENV-NE- WWSP 005b Inspections	Annual tree inspections undertaken by qualified personnel.	Ongoing. Inspections continue on a scheduled basis or if and when the need arises.	Allan Cameron	26-Apr-2023	31-Mar-2024
ENV-NE- WWSP 005c Partnerships	Active involvement with leading partners such as Forestry Commission and Natural England	This is ongoing.	Allan Cameron	26-Apr-2023	31-Mar-2024
ENV-NE- WWSP 005d Biosecurity	Measures in place for staff, volunteers and contractors including public messages	This is ongoing.	Allan Cameron	26-Apr-2023	31-Mar-2024
ENV-NE- WWSP 005e Tree Safety Policy	Review The Commons' Tree Safety Policy tri-annually.	The Commons' Tree Safety Policy is reviewed every three years. It was last reviewed in July 2021 and will be reviewed again in July 2024.	Allan Cameron	26-Apr-2023	01-Aug-2024

Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score	Risk Update and date of update	Target Risk Rating & Score	Target Date/Risk Approach	Flight path
ENV-NE- WWSP 001 Budget reduction and income loss  Page Feb-2022 Allan Cameron	Cause: Potential reduction in budget and income: reduction of income from car park charging; loss of income from rental properties.  Event: Reduced budget and income.  Effect: Potential staff reductions and inability to provide key services; financial failure; failure to achieve strategic objectives; significant reduction in service to users; reputational damage.	Football   Football	The Target Operating Model process is yet to be concluded and associated budget reductions are yet unknown. This is beyond our control and we are unable to reduce the risk in the foreseeable future.  However, a Countryside Stewardship grant has been secured until 2026 and two vacant properties have been rented out, one with a long-term tenant until 2027, and the other on a rolling residential annual contract. These help to offset previous budget cuts.  Car parking income was lower than estimated during 2022/23 (52% of estimated levels).  26 Apr 2023	Impact 6	Accept	

Action no, Title,	Action description			Latest Note Date	Due Date
ENV-NE- WWSP 001a Risk review	Keep risk under regular review.	This risk is kept under regular review.	Allan Cameron	26-Apr-2023	31-Mar-2024

ENV-NE-WWSP 006 Climate and Weather 24-Feb-2022 Allan Cameron Allan Cameron  Cause: Severe wind events, prolonged precipitation or restricted precipitation. May be climate change influenced Event: Severe weather/climate impacts; fire, flood and storm events (potentially increasing in frequency).  Effect: Service capability disrupted; increased demand for staff resources to respond to incidents and maintain site safety; loss of species; temporary site closures and associated access; increased costs for reactive management; injury or death to staff, visitors.	Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & So	core	Risk Update and date of update	Target Risk Rating &	Score	Target Date/Risk Approach	Flight path
contractors and volunteers; damage/loss of rare/fragile habitats and species.	WWSP 006 Climate and Weather 24-Feb-2022	precipitation or restricted precipitation. May be climate change influenced  Event: Severe weather/climate impacts; fire, flood and storm events (potentially increasing in frequency).  Effect: Service capability disrupted; increased demand for staff resources to respond to incidents and maintain site safety; loss of species; temporary site closures and associated access; increased costs for reactive management; injury or death to staff, visitors, contractors and volunteers; damage/loss of	Impact	6	continues to mitigate the impact of extreme weather events should they happen.			Accept	

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Otion no,	Action description	Latest Note		Latest Note Date	Due Date
SP 006a Fire management	Review and update Fire Management plan biannually. Habitat fire management and monitoring policies and plans in place which link to staff training and local emergency services.	Detailed fire maps have been completed and shared with the fire services. The next review of the Fire Management Plan will be undertaken in 2024.	Allan Cameron	26-Apr-2023	30-Apr-2024
ENV-NE- WWSP 006b Storms	Storm monitoring and management and closure policies are in place at the site and linked to high staff awareness and training.	The sites continue to monitor and respond to warnings of extreme weather.	Allan Cameron	26-Apr-2023	31-Mar-2024
ENV-NE- WWSP 006c Climate change	Understand the potential impacts of climate change on West Wickham and Spring Park. Engage in climate change research and debate.	Ongoing research and dialogue.	Allan Cameron	26-Apr-2023	31-Mar-2024

ENV-NE- WWSP 010 Brigade or Ambulance Service) undertake Industrial action. Event: Emergency services are not  Should the emergency services take industrial action, contingency plans will be implemented to minimise the impact of this risk. We accept the risk at its current level	Risk no, Title, Creation date, Owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score	Risk Update and date of update	Target Risk Rating & Score	Target Date/Risk Approach	Flight path
as we are doing everything possible to Wickham and Spring Park.  Effect: Inability to control wildfires; lack of urgent medical assistance for injured persons. Increased possibility of injury or death to staff, visitors, contractors and volunteers; damage/loss of rare/frigalle habitats and species; service capability disrupted; temporary site closures; damage to CoL property; increased demand for staff resources to respond to incidents and maintain site safety; increased demand for staff resources to respond to incidents and maintain site safety; increased costs for reactive management.  Put of the risk occurring is beyond our control.  Fire Management and Habitat Management Plans include appropriate contingency measures. In the event of industrial action by the ambulance service, high-risk activities such as tree-climbing would be paused and planned events would be assessed and modified, postponed or cancelled as appropriate should continuing with them be deemed unsafe.  Staff monitor reports of potential or confirmed industrial action and implement relevant local plans and the CoL's Fire Safety 'Industrial Action Contingency Advice' document as it applies to the site.  10-Feb-2023  Allan Cameron	WWSP 010 Industrial action by emergency services  Page 10-Feb-2023	Brigade or Ambulance Service) undertake industrial action.  Event: Emergency services are not available/slow to respond to incidents at West Wickham and Spring Park.  Effect: Inability to control wildfires; lack of urgent medical assistance for injured persons. Increased possibility of injury or death to staff, visitors, contractors and volunteers; damage/loss of rare/fragile habitats and species; service capability disrupted; temporary site closures; damage to CoL property; increased demand for staff resources to respond to incidents and maintain site safety; increased costs for	Live-bood	industrial action, contingency plans will be implemented to minimise the impact of this risk. We accept the risk at its current level as we are doing everything possible to mitigate the impact, but the likelihood of the risk occurring is beyond our control.  Fire Management and Habitat Management Plans include appropriate contingency measures. In the event of industrial action by the ambulance service, high-risk activities such as tree-climbing would be paused and planned events would be assessed and modified, postponed or cancelled as appropriate should continuing with them be deemed unsafe.  Staff monitor reports of potential or confirmed industrial action and implement relevant contingency plans as necessary.  Staff are fully conversant with the relevant local plans and the CoL's Fire Safety 'Industrial Action Contingency Advice' document as it applies to the site.	Impact	Accept	

Action no, Title,	Action description			Latest Note Date	Due Date
	1 11 1	J 1 5 J	Allan Cameron	26-Apr-2023	31-Mar-2024

### Appendix 6

Fire	Habitat Fire Action Plan.	where fire is a component).			
management		Maps within the 'Major Emergency Plan' will help in a slow response/unfamiliar fire crew/army reserves scenario.			
		Proactive work to manage firebreaks and residential boundaries to increase the resilience of West Wickham and Spring Park to wildfire will also help in a slow/no response scenario.			
		A water bowser is available on site for use by staff to damp down peat after a fire (not used for fire-fighting).			
		Staff are conversant with the content of the CoL's 'Industrial Action Contingency Advice' document as it applies to their site. This includes ensuring the safety of livestock			
ENV-NE- WWSP 010b Events and		High-risk activities such as tree-climbing would be paused or have additional controls applied should the emergency services be unavailable.	Allan Cameron	26-Apr-2023	31-Mar-2024
high-risk activities		All planned events are risk-assessed to ensure appropriate controls are in place to address fire, health and safety, and other risks. If it is considered that it would be unsafe to proceed with an event in the absence of external emergency service availability, a decision would be taken to modify, postpone or cancel as appropriate.			

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### Natural Environment Cross-divisional Risks – Summary Risk Register

**Report Author:** Joanne Hill **Generated on:** 26 April 2023



Risk code	Risk title	Current risk score	Current risk score indicator	Target risk score	Target risk score indicator	Trend icon	Flight path (current risk score history)
V-NE 003	Operational Property: Repair and maintenance of buildings and structural assets	24		24			
NE 001	Health & Safety	24		12			
ENV-NE 007	Wanstead Park Reservoirs (formerly CR32)	24		8			
ENV-NE 004	Pests and diseases	16		12			
ENV-NE 002	Extreme weather and climate change	12		6			
ENV-NE 005	Impact of development	12		6			
ENV-NE 011	Recruitment and retention of staff	12		4	<b>②</b>		
ENV-NE 010	Budget pressures	8		6		_	
ENV-NE 009	Failure to implement the Charity Review	6		3	<b>Ø</b>	_	

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# Agenda Item 20

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



# Agenda Item 23

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















# Agenda Item 24

By virtue of paragraph(s) 1, 2, 3, 4 of Part 1 of Schedule 12A of the Local Government Act 1972.



















