

Committee(s)	Dated:
Epping Forest Consultative – For information Epping Forest and Commons – For decision	23 10 2019 18 11 2019
Subject: Leyton Flats Individual Site Plan (SEF 41/19b)	Public
Report of: Colin Buttery, Director of Open Spaces	For Decision
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Summary

A Strategy and Management Plan for Epping Forest for the period of 2020-30 is being developed alongside a 2020-23 Business Plan. Given the relative size of the Forest and the marked variety of the landscapes and habitats there is a need to describe the discrete management of key areas.

This report outlines the Individual Site Plan (ISP) that has been prepared for Leyton Flats. The legal and statutory context and significant management considerations described in the ISP have been outlined along with the management strategy proposed for the area.

Recommendation(s)

Members are asked to:

- i. Approve the Leyton Flats Integrated Site Plan for public consultation

Main Report

Background

1. On the 11 March 2019, it was reported to your committee that a Strategy and Management Plan for Epping Forest for the period of 2020-29 was in the process of being developed. As part of the development strategy, existing operational activity in key geographical locations and for key activities was the subject of review.
2. The review process comprises an audit of the City Corporation's (CoL) property management issues alongside other significant management considerations, to provide an overview of current practice and an outline of longer term aspirations.
3. This reports outlines the Individual Site Plan (ISP) for Leyton Flats that has been prepared as part of the review.

Current Position

4. Leyton Flats is an area of open ground, woodland and ponds on the edge of London; the majority of which lies within the London Borough of Waltham Forest. Eagle Pond, at the northeast corner of the Flats, is within the London Borough of Redbridge. Leyton Flats is part of Epping Forest (Compartment 36) and protected by the Epping Forest Acts 1878 and 1880.
5. The majority of Leyton Flats is designated a Site of Special Scientific Interest (SSSI) and a Special Area of Conservation (SAC). The compartment was assessed by Natural England (NE) in January 2010 as 'unfavourable - no change' (Natural England, 2010), with poor air quality and the level of recreational pressure being major concerns. Under the Flood and Water Management Act 2010, Eagle Pond is a Large Raised Reservoir as it impounds more than 25,000 cubic metres of water. Ownership of the lake and its banks is split between Her Majesties Court Service (HMCS), London Borough of Redbridge (LBR) and the City Corporation. In 2013, works to increase the capacity of the Eagle Pond spillway, to enable it to cope with a Probable Maximum Flood event (as defined by the Flood and Water Management Act 2010), were completed by HMCS.
6. The 2014 visitor survey found that Leyton Flats is the most visited area within Epping Forest, with a total of 430,000 visits recorded. Leyton Flats is an important natural green space for the large number of residents within walking distance of the Flats, many of whom live in accommodation with no outside space. There are roughly 1 million residents within 5 miles of Leyton Flats. The London Borough of Waltham Forest (LBWF) are currently committed to provide for 27,000 additional housing units by 2030 and in the process of updating its Local Plan to cover the period up to 2026, which will provide for a further increase in housing capacity, including up to a possible 1,700 units adjacent to Leyton Flats.
7. Current recreational use is adversely impacting the biodiversity of Leyton Flats and the acid grassland in particular. The existing access infrastructure reflects and older era of visitor offer and requires updating to ensure it can cope with both current and likely future visitors needs.

Proposals

8. The ISP first outlines the property management issues and other significant management considerations impacting on the area, before presenting a management strategy and outline management program. A more detailed operational work activity plan is presented in an appendix.

Management Strategy

9. In addition to the need to discharge its obligations with respect to legal and statutory context, the ISP identifies a 10-year management strategy for Leytons Flats, summarised as follows:

- a. to identify a programme of conservation measures that will contribute towards improving the condition status of the Leyton Flats SAC/SSSI and Eagle Pond SINC;
- b. to ensure that COL offers a visitor experience to Leyton Flats that meets the needs of the communities today and into the future, in a sustainable and welcoming way;
- c. to finance an Infrastructure Improvement Programme from increased income generation originating from Leyton Flats; and,
- d. to encourage local community involvement in the management and development of Leyton Flats.

Management Considerations

10. There are a wide range of management considerations given in the report and these have been summarised below:

- a. Ecological: Acid grassland, which is a UK Biodiversity Action Plan habitat, represents a large part of the site and is being adversely impacted by recreational pressure, air pollution, tree and scrub encroachment and the decline in grazing. The Flats are also the London stronghold for Creeping Willow (*Salix repens*) with only six colonies present in 2015. Hollow and Eagle Ponds form a significant part of Leyton Flats, with Hollow Pond having one of the richest remaining aquatic floras in Epping Forest. Water quality and supply are notable concerns;
- b. Heritage and community: Leyton Flats has a distinctive community heritage that appears to be under recognised both on the ground and through the relative absence of community representation on its significance. It had at one time the UK's largest Lido and Eagle Pond was once part of the wider landscaping of the Wanstead Park Estate in the 18th Century. Hollow Pond also has a distinctive local presence. Notably, and in contrast to similarly popular Forest locations with nearby communities, there is a relatively low level of local community involvement in the management of Leyton Flats;
- c. Access/Local Plans: Hollow Ponds is the most visited location in Epping Forest and as well as being surrounded by relatively densely populated areas it is also well connected to the public transport and cycle network. The visitor infrastructure is under capacity to cope with current use and there is a strong potential for additional increase in visitor pressure from planned housing development; and,
- d. Anti-social Behaviour: Leyton Flats is substantially adversely impacted by most of the anti-social behaviour problems experienced at Epping Forest. Successively responding to these will be an important aspect of the future management of Leyton flats.

Outline Management Program and Operations Plan spreadsheet

11. The ISP presents a 5-year outline management program, which is then further detailed in Appendix 1 of the report (see the Operations Plan spreadsheet). This

will be reviewed and updated yearly to monitor the progress of the management program and ensure that it continues to deliver the outcomes set out in the 10-year management strategy. As well as works to be undertaken using existing resources, potential enhancement projects requiring additional support are also identified. Three enhancement projects are outlined, for which it is proposed practical and/or financial support from community partners will be sought:

- a. Visitor Access infrastructure: Unquantified at present is the long term development of the visitor access infrastructure to meet the changing community needs linked to future substantial development in the area. Works arising from such developments does not form part of the current site expenditure and additional funding will need to be identified to progress any changes and also to develop plans and proposals.
- b. Waterbody Management: The diversification of the marginal vegetation at Eagle pond through purchasing and planting appropriate plants is a potential community and volunteer project.
- c. Ancient tree management: The survey of ancient / veteran trees on the Flats is a possible community based project.
- d. Species Management: the Creeping Willow and amphibian conservation projects are potential community based projects, the latter is already in hand with Froglife.

The planned Epping Forest SAC Mitigation Strategy is expected to complement proposals in the ISP.

Corporate & Strategic Implications

12. City of London Corporate Plan 2018 - 2023: the restoration and maintenance of the internationally and nationally important habitats of Epping Forest directly underscore the *third pillar* of the Corporate Plan, which is to “*shape outstanding environments*”. The development of ISP’s and PDN form part of the operational planning to achieve this aim of the Corporate Plan.
13. Open Spaces Department Business Plan 2016-19: The Strategic Vision of this plan is to ‘Preserve and protect our world class green spaces for the benefit of our local communities and the environment.’ and one of the Department Objectives is to ‘Protect and conserve the ecology, biodiversity and heritage of our sites.’ The preparation of the Epping Forest Management Strategy and Management Plan for 2019-29 is a key action in the Departmental Business Plan.
14. No negative equality impacts were identified for this proposal, with the prospect of improved accessibility for people with some disabilities and parents with young children.

Implications

15. **Financial:** The outline management program has been framed to fit within existing levels of local risk spend at Leyton Flats.
16. Several projects have been identified which will only be progressed if additional financial and practical support can be obtained.

17. **Legal:** The main legal and statutory issues, additional to the normal actions such as tree safety management which are undertaken through the Forest, and for which action will be required at Leyton Flats have been identified as:
- a. Flood risk and dam infrastructure: Eagle Pond is a Large Raised Reservoir which the COL share joint responsibility for with the London Borough of Redbridge and Her Majesties Court Service;
 - b. Fire Risk: Leyton Flats has a history of periodic and at times large fires.
 - c. Statutory Designations: The majority of Leyton Flats is designated a Site of Special Scientific Interest (SSSI) and a Special Area of Conservation (SAC). The compartment was assessed by Natural England (NE) in January 2010 as 'unfavourable - no change';
 - d. Invasive / Alien Species: There is a heavy infestation of New Zealand Pygmyweed (*Crassula helmsii*) in Dog Pond and it is present on the margins of Hollow Pond. Oak Processionary Moth (*Thaumetopoea processionea*) is increasingly prevalent on the many open grown oaks across the site and poses a risk to human health;
 - e. Utilities: Beckton desalination pipeline crosses Leyton Flats from the southeast to the northwest, with City required to keep the wayleave clear of woody vegetation.
18. **Charity:** Epping Forest is a registered charity (number 232990). Charity Law obliges Members to ensure that the decisions they take in relation to the Charity must be taken in the best interests of the Charity.
19. **Exiting the European Union (EEU):** The main influence of EU law on development close to the Epping Forest SAC relates to the Environmental Assessment of Plans and Programmes Regulations 2004 (the 'SEA Regulations') and the Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna & Flora, which is incorporated into UK law as the Conservation of Habitats and Species Regulations 2017 (the 'Habitats Regulations'). The future influence of existing EU Directives and the Regulations may be affected by the EU and will also be consequent on the terms reached with the EU as part of Brexit negotiations and the future governments views on 'Retained EU law' contained within the EU (Withdrawal) Act 2018.
20. **Consultative Committee:** The Committee noted the obvious connections to the Whipps Cross Hospital redevelopment plan; the City Corporation's response to the London Borough of Waltham Forest Local Plan and the forthcoming Epping Forest Special Area of Conservation Mitigation Strategy. The Committee supported the focus of the ISP, and requested that the City Corporation gives particular attention to improving the built structures and associated facilities on the site, a strong approach to better managing Invasive Non-Native Species (INNS); the retention of water in Hollow Ponds and support to the creation of a Friends Group for the area.

Conclusion

21. An ISP has been prepared for Leyton Flats. This identifies the legal and statutory context and other significant management considerations that should be

considered when approaching the management of this area, and which have drawn on the consultation and support of local stakeholders to develop.

22. A management strategy for the next 10 years is presented along with an outline management program and detailed work proposals. These proposals highlight works that can be achieved through existing Local Risk resources, but also where additional support will be required.

Appendices

- Appendix 1 – Leyton Flats: Individual Site Plan
- Appendix 2 – Amphibian survey results and management recommendations
- Appendix 3 – Photographic evidence
- Appendix 4 – Figures 1 (supplied as separate PDF documents)

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