

Committee(s): Epping Forest Consultative – for Consideration Epping Forest and Commons – For Decision	Dated: 09/02/2022 09/05/2022
Subject: Application to Natural England for recognition as a National Nature Reserve (SEF 10/22b)	Public
Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?	2, 11, 12
Does this proposal require extra revenue and/or capital spending?	N
If so, how much?	£
What is the source of Funding?	
Has this Funding Source been agreed with the Chamberlain’s Department?	N
Report of: Juliemma McLoughlin, Executive Director, Environment	For Decision
Report author: Paul Thomson, Epping Forest	

Summary

A key Government report in the history of conservation, ‘The Conservation of Nature in England and Wales’ Report published in 1947 proposed including Epping Forest in a then new national designation of ‘National Nature Reserve’ (NNR), with the intention of dedicating the site to scientific research and the protection of endangered species. Given the requirements of the Epping Forest Acts 1878 & 1880 to provide public access, which was then considered by Government to be detrimental to the ambitions of wildlife conservation, negotiations with the City Corporation concluded that NNR status was not then an appropriate designation for the more integrated management of the Forest, and the NNR designation was abandoned.

Over time, the Government conservation agency English Nature, and its successor, Natural England, have broadened their approach to public access at NNRs culminating in a new NNR strategy in 2017 ‘NNRs – At the heart of 21st century conservation’. The strategy promotes a broader NNR agenda based upon conservation, environmental research, high quality access for people and stronger local partnerships with landscapes and communities. Following a recent visit by senior officials from Natural England to Epping Forest, the City Corporation has been encouraged to consider seeking nomination for Epping Forest, and selected areas of the Epping Forest Buffer Land, as a new National Nature Reserve, reflecting an improved strategic ‘fit’ between the Forest and the expanded NNR remit.

This report is necessary to seek the views of the Consultative Committee on the opportunities presented by a potential NNR designation for Epping Forest and its associated Buffer Land.

Recommendation(s)

Members are asked to consider:

- The completion an Expression of Interest to Natural England for the designation of the majority of Epping Forest and its associated Buffer land as a National Nature Reserve.

Main Report

Background

1. National Nature Reserves (NNRs) are a Natural England designation that reflects the recreational and conservation value of important sites across England. NNRs are recognised as being ‘the crown jewels of England’s natural heritage’. There are currently 225 NNRs in England, covering 243,645 acres (98,600 hectares) or 0.7% of England’s land surface. Natural England (NE) – the Government’s adviser for the natural environment – is responsible for designating all NNRs and also manages about two thirds of England’s NNRs. The remaining reserves are managed by other government agencies, such as the Forestry Commission, and organisations approved by Natural England including local authorities and third sector organisations such as The National Trust, RSPB, and Wildlife Trusts.
2. Responding to the shortcomings of the Access to Mountains Act 1939 which failed to provide meaningful public access to mountain, moor, heath, down or cliff, the Dower Report (1945) and two subsequent key Government bodies, sought to plan the provision of public access and the conservation of wildlife in post-War Britain. The National Parks Committee, known as the Hobhouse Committee, sought to select areas and routes for public access and the preservation of natural beauty, while The Wildlife Conservation Special Committee, known as the Huxley Committee, investigated the specific issue of nature conservation in England and Wales, especially potential conflicts with national park designation.
3. While the Dower Report proposed uniting nature reserves and national parks, the Huxley Committee argued that they needed to be administered separately. Naturalists and conservationists expressed concern that nature reserves dedicated to scientific research, or the protection of endangered species, would not prosper if public access were allowed. The Committee’s Report, ‘The Conservation of Nature in England and Wales’ recommended the establishment of National Natures Reserves under the direction of the proposed Biological Service to study wildlife and its management.
4. Given the requirements of the Epping Forest Acts 1878 & 1880 to provide public access, which was then considered by Government to be detrimental to the ambitions of wildlife conservation, negotiations with the City Corporation concluded that NNR status was not an appropriate designation for the more integrated management of the Forest, and the NNR designation was abandoned for Epping Forest.

Current position

5. Currently three of the City's Natural Environment within The Commons team already have NNR status, namely, Burnham Beeches NNR (declared 1992); Ashted Common NNR (declared 1995) and Riddlesdown, Farthing Downs, Happy Valley, Coulsdon and Kenley Commons forming part of the South London Downs NNR (designated in 2019)
6. Over time Government conservation agencies English Nature, and its successor Natural England, have broadened their approach to public access to NNRs, culminating in a new NNR strategy published in 2017 'NNRs – At the heart of 21st century' conservation' The strategy now promotes a broad NNR agenda based upon conservation, environmental research, high quality access for people, and stronger local partnerships with landscapes and communities.
7. To realise its new strategy Natural England is seeking to declare an additional range of new NNR's across England, a process that has been largely moribund since the mid-1990's. A recent visit by senior officials from Natural England to Epping Forest, encouraged the City Corporation to consider seeking nomination for Epping Forest and selected areas of the Epping Forest Buffer Land as a new National Nature Reserve, reflecting an improved strategic 'fit' between the Forest and the expanded NNR remit.
8. Initial discussions with Natural England suggest that given The Wildlife Conservation Special Committee's (1947) early identification of Epping Forest as a potential NNR, alongside the impressive legacy of Essex Field Club's early nature fieldwork and the strong landscape links to 1,800 acres of Buffer Land, Epping Forest would be high on NE's list of potential new NNRs. In addition, Epping Forest contains a range of important NNR components including Local Geological Sites (LoGS), and a series of Special Wildlife Sites (SWS) on the Epping Forest Buffer Lands.
9. The declaration of Epping Forest as an NNR would not only recognise the high recreation and conservation value of the site, but also the high standards of management expertise required to maintain that value. The NNR declaration would present a high-profile opportunity to the City to celebrate the importance of Epping Forest to local people and the conservation work being undertaken.
10. Key strengths of NNR status include:
 - a. Opportunities to increase collaboration between landowners such as the Essex Wildlife Trust at Gernons Bushes and Mallinson Park Wood Trust at Woodford.
 - b. Enhance profile of the owning bodies and managers.
 - c. Recognised as places of excellence where people can engage with nature.
 - d. High standards of biodiversity and geodiversity where an abundance of variety of wildlife can be found.
 - e. Extensive environmental monitoring and research opportunities.

- f. Enables the City to demonstrate its support for the Government's strategic desire to use NNRs to galvanise landscape-scale conservation – reflecting what is known as the 'Lawton principle'.
- g. Higher profile to attract environmental grants.

Options

11. Your Committee has two options:

- (a) To make an expression of interest to Natural England seeking NNR status for Epping Forest and the Epping Forest Buffer Land as a prelude to negotiations with Natural England and the appropriate Local Authorities and neighbours, with the intention of bringing formal proposals to this Committee for subsequent consideration. **This option is recommended.**
- (b) To decline the invitation to make an expression of interest to Natural England, losing the opportunity to secure additional benefits for Epping Forest and the Epping Forest Buffer land. **The option is not recommended.**

Corporate & Strategic Implications

12. Epping Forest Consultative Committee – The proposal to respond to Natural England's invitation to consider National Nature Reserve (NNR) status, stimulated considerable debate with many Consultative Committee members expressing concern regarding a greater emphasis on nature conservation at the expense of other duties, and the greater involvement of Natural England to the possible detriment of the Forest. These views partly reflected the original post-war concerns with the original Huxley Committee proposals for Epping Forest. Other Members were generally excited by a further accolade that could protect parts of the Forest beyond SSSI and SAC status and offer the opportunity to involve immediate neighbours who hold parts of the Forest. Many members were persuaded that further negotiations would be appropriate, but insisted that the Consultative Committee should be given a further opportunity to consider the final proposal.

13. The recommendation of this report supports the Corporate Plan with particular reference to the following aims:

- a. Contribute to a flourishing society
 - i. People enjoy good health and wellbeing
 - ii. Communities are cohesive and have the facilities they need
- b. Shape Outstanding Environments
 - i. We inspire enterprise, excellence, creativity, and collaboration.
 - ii. We have clean air, land and water and a thriving and sustainable natural environment.
 - iii. Our spaces are secure, resilient, and well maintained

14. And supports the Open Spaces Business Plan as follows:

- a. Open Spaces and historic sites are thriving and accessible.
 - i. Our open spaces, heritage and cultural assets are protected, conserved, and enhanced
 - ii. London has clean air and mitigates flood risk and climate change
 - iii. Our spaces are accessible, inclusive, and safe
 - iv. Our habitats are flourishing, biodiverse and resilient to change.
 - b. Spaces enrich people's lives.
 - i. People enjoy good health and well-being
Nature, heritage, and place are valued and understood
 - ii. People feel welcome and included
 - iii. Business practices are responsible and sustainable.
 - iv. i. Our practices are financially, socially, and environmentally sustainable
 - v. ii. London's natural capital and heritage assets are enhanced through our leadership, influence, investment, collaboration, and innovation
15. Financial Implications The experience at Burnham Beeches and Ashted Common indicates that NNR status need not place an additional funding burden on the City, apart from the inclusion of the designation in future signage and publications, which can be accommodated over time. Indeed, NNR status can potentially attract additional funding, particularly towards the cost of research and monitoring, alongside greater volunteer interest. NNR status can also raise the land's profile for grants to fund conservation and recreation objectives.
16. The proposal provides opportunities to build closer working partnerships with the Epping Forest District and London Boroughs together with other allied neighbouring landowners such as the Essex Wildlife Trust, to develop shared management plans, objectives, and projects with the prospect of making more efficient use of the resources available.
17. NNR status does not bring greater legal protection, or management obligations, to the land. Conversely, NNR status if utilised correctly could secure high reputational values to NNR landowners and provides greater weight to environmental protection issues as part of the Local Authority's Local Plan.
18. Charity Implications – Epping Forest is a registered charity (number 232990). Charity Law obliges Members to ensure that the decisions they take in relation to the Charity must be taken in the best interests of the Charity.

Conclusion

19. NNR status has the potential to provide enhanced reputational value for the City Corporation and other participating landowners. Moreover, the collective management of the natural environment in partnership with other allied organisations would demonstrate the City's commitment to the Government's strategic aim to create landscape-scale conservation projects.

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