

## Epping Forest Strategic Access Management and Monitoring (SAMM) Strategy 2021

### 1. Background

- 1.1 Epping Forest is London's largest open space, covering 2,400 hectares. Epping Forest Special Area of Conservation (EF SAC) covers 1,600 hectares of Sites of Special Scientific Interest (SSSI) within Greater London and Essex.
- 1.2 The SAC is designated for three Annex I habitats (Northern Atlantic wet heaths, European dry heaths, and Atlantic acidophilous beech forests), as well as one Annex II species (Stag Beetle). The Forest comprises wood-pasture with habitats of high nature conservation value including ancient semi-natural woodland, old grassland plains, wet and dry heathland, and scattered wetland. The woodland represents one of the largest continuous semi-natural blocks in the country, characterised by groves of over-mature pollards. The plains contain a variety of unimproved acid grasslands uncommon elsewhere in Essex and the London Area. The Forest supports a nationally outstanding assemblage of invertebrates, major amphibian interest and an exceptional breeding bird community. The Forest lies on a ridge of London clay overlain in places by Claygate Beds, and in the highest areas by Bagshot Sand and Pebble Gravel. The varied geology gives rise to a mosaic of soil types from neutral soils to acidic loams and from impervious clays to well-drained gravels. To a large extent the soil patterns have dictated the pattern of vegetation. Historically Epping Forest was managed as wood-pasture through pollarding, which declined during the 19th century and eventually ceased in 1878 under the Epping Forest Act. Recently pollarding has been reinstated in some places.
- 1.3 The Forest is managed by a team of Forest Keepers, grounds and other staff led by a Superintendent. It is patrolled 365 days a year by Forest Keepers whose role is to assist the public to enjoy the Forest safely and protect the Forest from inappropriate damage or abuse. The Forest Keepers are also attested constables and enforce the Epping Forest byelaws. If necessary, this includes prosecuting byelaw infringement cases in the Magistrates Court.
- 1.4 SACs are protected in UK law by the Habitats Regulations (2017)<sup>1</sup>. Under the Habitats Regulations, development proposals must not give rise to adverse effects on the integrity of the SAC, either alone or in combination with other plans and projects, and if they are likely to, measures must be secured to remove this impact, otherwise the Competent Authority is obliged to refuse permission (subject to the exception tests set out in Regulation 64 (1)).
- 1.5 The legislation sets out that a Habitats Regulation Assessment (HRA) must be undertaken where a land use plan, either alone or in combination, is likely to have a significant effect on an internationally important site. This applies to Local Plans produced by local authorities, as well as Neighbourhood Plans produced by local communities. Such plans set out a broad quantum of housing growth. HRA work must therefore consider the overall impacts of such growth – in combination with

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<sup>1</sup> The Conservation of Habitats and Species Regulations, 2017

neighbouring authorities – and where there are any likely significant effects, adverse effects must be ruled out (subject to the same exception tests mentioned in 1.4).

## **2 Concerns relating to recreational pressure**

2.1 Epping Forest provides an attractive, extensive area of open semi-natural habitat close to London. As such it is a popular destination for recreation and provides an important function as a greenspace. There are 47 car parks and four visitor centres and estimates of visitor use indicate around 4.2million visitors visit the forest each year.<sup>2</sup> Since Epping Forest was entrusted to the City of London, the provision of the space for public recreation and enjoyment has been a legal obligation and one of the key priorities for the Conservators. There is however a considerable challenge to balance the needs of the high (and growing) numbers of visitors with the natural aspect of the Forest and the nature conservation interest. There are a number of potential ways recreation could have an impact on the nature conservation of the site. These include:

- Eutrophication from dog fouling;
- Trampling/wear, leading to soil compaction, vegetation wear, erosion and damage to veteran tree roots;
- Increased fire risk (and potentially difficulties in access for emergency vehicles if gates etc. are blocked);
- Difficulties in establishing the best grazing management due to interactions between visitors and livestock;
- Direct damage to veteran trees, for example from climbing on them;
- Harvesting, for example fungi, deadwood;
- Disturbance to invertebrates and other wildlife;
- Spread of disease;
- Spread of alien plants;
- Staff time taken away from necessary management due to the need to deal with vandalism, breaches of byelaws etc.; and
- Direct damage and vandalism of infrastructure.

## **3 Evidence of Visitor Pressure at Epping Forest**

- 3.1 Existing Visitor Survey information held by the Corporation of London relates to work undertaken between 2010 and 2014, when staff and volunteers worked together with specialist consultancy support to undertake a large amount of visitor survey work. The results are set out in annual reports and provide information on overall visitor numbers and the spatial distribution of access within Epping Forest but did not generate home postcodes from a robust sample of visitors.
- 3.2 Due to concerns over the impact of recreational pressure on Epping Forest SAC, Footprint Ecology were commissioned to carry out a Visitor Survey in 2017, and again in 2019. The 2017 Epping Forest Visitor Survey can be found [here](#), and the 2019

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<sup>2</sup> This figure is from the Management Plan Consultation in 2014.

survey can be found [here](#), these set out the methodology used for the surveys, as well as the findings arising from it.

- 3.3 A 6.2km boundary extended around the SAC forms the Zone of Influence, this has been based on Visitor Surveys carried out in 2017 and 2019. The Zone of Influence was calculated based on the 75<sup>th</sup> percentile method, which calculates the distance from which 75% of visits originate from and is a recognised method for informing strategic solutions to manage recreational pressure nationwide.
- 3.4 The Zone of Influence involves multiple local authorities, of which seven each contribute over 2% of visits to the SAC. Housing delivery will lead to a significant rise in population within the boroughs and districts around Epping Forest SAC. Investigations of the visitor patterns of current residents around the SAC have shown that it is likely that this new population will also use the SAC for recreation. Both local evidence and that from other areas has demonstrated the damaging effects of human disturbance on the nature conservation interest of the site. Without appropriate and proportionate avoidance and mitigation measures, this will damage the features for which the SAC is designated and would be contrary to the Habitats Regulations. The boroughs which contribute over 2% of visits to the SAC (based on the 2019 visitor survey) and are signatories to this strategic agreement are as follows:
- Epping Forest District Council
  - London Borough of Waltham Forest
  - London Borough of Redbridge
  - London Borough of Enfield
  - London Borough of Newham
- 3.5 Due to the number of local authorities involved and the cumulative nature of the impacts (a result of many individual housing applications), a co-ordinated approach to the mitigation is necessary. A well-established Technical Oversight Group provides the vehicle for joint working between local authorities and other organisations responsible for protection of Epping Forest SAC. The Technical Oversight Group includes Officer representation for each affected Local Authority together with City of London Conservators (as owners and managers of the site) and Natural England.
- 3.6 This has led to the development of this strategic approach encompassing:
- 1.1 A formal Governance Agreement between the Local Authorities within the Zone of Influence and the City of London as the Delivery Body for the mitigation programme
  - 1.2 A programme of Strategic Access Management and Monitoring (SAMM) measures to mitigate the impact of new development
- 3.7 There is also a need for avoidance measures including Suitable Alternative Natural Greenspace, and a toolkit approach to infrastructure improvements that improve access and capacity of existing greenspaces. This approach is being dealt with by each local authority on an individual basis.

## 4 SAMM Programme

- 4.1 The City of London Corporation, as Conservators of Epping Forest, commissioned a report in 2020 to undertake a detailed assessment of the Epping Forest Special Area of Conservation. The purpose of the report was to better understand the effects of recreational pressure on the Epping Forest SAC and the measures needed to avoid harm arising from current and predicted future growth in visitors on the Forest. The report provided an in-depth assessment and identified a range of costed measures. The report has provided guidance not only to the Conservators in terms of their responsibilities as the custodians of the Forest on behalf of the landowner (the City of London Corporation) but also to inform the development of this Strategy. The strategy laid out here supersedes the [2018 interim approach](#) to mitigation measures.
- 4.2 The proposed measures have been reviewed by several local authorities (in their role as competent authorities) and by Natural England (as the government's advisor for the natural environment in England). This has ensured that the measures identified in this Strategy are those necessary to mitigate the effects of future development on the Epping Forest SAC. As such they do not seek to address existing issues or include measures that are the responsibility of the landowner. As such the measures in Table 1 below are those for which financial contributions should be secured from all relevant development. The measures are compliant with the Habitats Regulations and accord with paragraph 57 of the National Planning Policy Framework 2021 as being:
- a) necessary to make the development acceptable in planning terms.
  - b) directly related to the development; and
  - c) fairly and reasonably related in scale and kind to the development.
- 4.3 The measures provide a comprehensive approach to mitigating the effects of future development. There are three key strands as follows:
- **a site-wide approach** to physically manage additional 'wear and tear' on surfaced and unsurfaced tracks and paths, provision of enhancements to wayfinding and interpretation, and the on-going monitoring of ecological conditions and visitor usage;
  - **managing increased use of the three 'visitor hubs.'** Their facilities act as 'attractors' and, as has been evidenced by the Visitor Surveys undertaken in 2017 and 2019, are used on a regular basis by residents. This places focused pressure on these parts of the Forest;
  - **on-going visitor engagement activities** to help raise awareness of the issues facing the Forest, to encourage 'Forest-friendly' behaviours (through on-site engagement with visitors and with local resident user groups) and to manage the use of 'access pressure points' by encouraging people to use different routes at times when some routes may temporarily be more vulnerable to over-use.
- 4.4 The Strategy also includes Project Manager support for the oversight of the Strategy's implementation. This includes regular reporting back to the competent authorities to ensure that monies collected are being spent in accordance with the agreed strategy. The day-to-day management of this post will be undertaken by the Conservators and the funding of this post ensures that there is no cost-burden for the

organisation recognising that this role is necessary to ensure the proper oversight of the implementation of the Strategy on behalf of the competent authorities.

- 4.5 Account has been taken of the need to ensure that these measures continue to be provided over the longer-term. This reflects the fact that new homes will result in additional visitors on an on-going basis. Consequently, the financial contributions being secured include an 'in-perpetuity' factor to ensure that the on-going management and maintenance of the measures is taken into account and is based on an 80 year period. This is considered to appropriately reflect the lifespan of the relevant developments.
- 4.6 The total cost of the proposed SAMM programme is £24,817,468. As detailed in Schedule 2, this sum is to be met through SAMM contributions from the five local authorities within 6.2km of the SAC who each contribute more than 2% of visitor numbers to the forest.

*Table 1. Proposed Site wide measures and costings.*

<b>Proposal</b>	<b>Detail</b>	<b>Capital cost</b>	<b>Annual Maintenance</b>	<b>80 Year Cost</b>	<b>Further Comments</b>
<b>Physical management of surfaced paths and tracks across other (non hub) SAC areas.</b>	Upgrades to surfaced paths and tracks to reflect expected visitor uplift	£30,000	£28,500	£2,310,000.00	Surfaced network amounts to over 38kms, repaired on a 10year cycle of up to 3800m2 per year to deal with increased need for path maintenance. These costs reflect a 20% proportion of the total cost reflective of the level of visitor uplift expected. Also includes £15,000 for upgrade in surfacing on one of the easy access paths within the forest.
<b>Physical management of unsurfaced paths and tracks across other (non hub) SAC areas.</b>	Management of paths that is required to deal with the expected visitor uplift	N/A	£6,000	£480,000.00	At least 93km of unsurfaced path network within the forest, as well as 41km of Public Rights of Way through the forest, with these paths either at or near capacity. Annual management of the wear and tear of these pathways is needed, including ditch reprofiling, culverting and vegetation cutting to ensure that they remain useable. As above, these costs represent 20% of the total projected annual cost, in line with the level of visitor uplift expected.
<b>Signage at transport nodes- Map and interpretation including installation</b>	Map and interpretation boards at Chingford, Loughton, Theydon Bois and Epping.	£10,000	N/A	£70,000.00	Need for greater waymarking at Transport Networks to engage with visitors to the forest. Signs have a 10 year lifespan, so need replacing seven times over 80 years.
<b>Interpretation roll out - forest wide</b>	Interpretation boards across the SAC areas	£35,200	N/A	£246,400.00	To improve engagement with visitors and greater awareness of Epping Forest SAC and its importance. Costings are given for 22 boards within the SAC. A1 orientation boards (£1,600 each), max 10-year-lifespan needing replacing seven times over 80 years.

<b>Visitor engagement campaigns</b>	Promotional materials to assist in engagement campaigns.	N/A	£10,000	£70,000.00	To encourage responsible behaviour of visitors to the forest. As communication methods are changing this will be reviewed by the Technical Oversight Group in terms of effectiveness.
<b>Cycle Map</b>	Cycle map to encourage visits.	£2,000		£16,000.00	Costings estimated on the basis that as with visitor engagement this will need to be revisited every 10 years.
<b>Mitigation Strategy Delivery Officer (Project Management and field monitoring experience)</b>	Overseeing the delivery of the SAMM project and also taking on providing briefing reports where appropriate to the oversight group		£57,000	£4,503,000	CoL Grade E – minimum grade for project managers and those managing teams of staff on technical issues. The salary is the 3 <sup>rd</sup> of six increments for this grade. Not the starting salary – as it is attempting to average the costs over in perpetuity, when it is expected that most officers would reach the top increment so be paid more than this salary but equally there would be turnover from new starters during the project. Breakdown of Total Cost: £36,070 salary, £4,020 Outer London Weighting, £12,919 on costs, £1,000 annual IT cost, £2,500 share of 2 x vehicle lease between team of 4, £300 annual mobile phone cost, £100 uniform provision, and replacement.
<b>Visitor surveys (incl for SAC, relevant SANGS and buffer lands) every 5 years</b>	Delivered by external consultants		N/A	£400,000.00	Needed to ensure that the governance agreement and mitigation strategy can be reviewed and updated accordingly.
<b>Forest Wide Ambassadors</b>	Provision of a ranger service across the SAC. Three rangers will be needed to ensure the full area can be covered, and to allow for a sufficient rota. Starting in year 2 having been recruited in year one by the MSDO.		£44,500	£3,515,500	CoL Grade C – This is the Forest Keepers grade and the basic grade for frontline technical officers and those engaging with the public and local communities. This role would involve both monitoring of recreational impact (which would require a knowledge of data collection) as well as a high level of community engagement skills. The salary is the 3 <sup>rd</sup> of the six

<b>Forest Wide Ambassadors</b>	Provision of a ranger service across the SAC. Three rangers will be needed to ensure the full area can be covered, and to allow for a sufficient rota. Starting in year 4 (2025-26).		£44,500	£3,426,500	increments for Grade C. It is not a starting salary, as it is attempting to average the costs over an in-perpetuity period – as with the MSDO it is expected that Ambassadors would reach the top increment but that there would also be turnover of staff.
<b>Forest Wide Ambassadors</b>	Provision of a ranger service across the SAC. Three rangers will be needed to ensure the full area can be covered, and to allow for a sufficient rota. Starting in year 6 (2027-28).		£44,500	£3,337,500	Breakdown of Total Costs (per Ambassador): £25,190 salary, £288 pending salary increase Dec 21, £4,020 Outer London Weighting, £10,867 on costs, £1,000 annual IT cost, £2,500 share of 2 x vehicle lease between team of 4, £300 annual mobile phone cost, £100 uniform provision, and replacement.
<b>Monitoring visitor impacts on soils and ecology of SAC</b>	Baseline survey by year 2 and then every 4 years (£15,000 per survey). Also FPPs of main erosion areas every two years (£2,000 per survey).		N/A	£397,000.00	Necessary to ensure that the mitigation strategy can be updated as appropriate to reflect changes in pressure, and therefore impacts on the SAC.
<b>High Beach Hub Costings</b>	See Tables 2 and 3			£998,386.50	
<b>Chingford Hub Costings</b>	See Tables 2 and 3			£2,567,974.05	
<b>Leyton Flats Costings</b>	See Tables 2 and 3			£2,479,208.50	
		<b>TOTAL COSTS</b>		<b>£24,817,469.05</b>	



*Table 2. Proposed Projects at each of the three hubs*

Location	ID no. in LUC tables	Proposal	Capital Cost	Annual Maintenance Costs	80 Years Costs
High Beach	2	Surface and edging improvements to the signposted accessible footpath loop and realignment to avoid safety hazards posed by ancient trees	£59,355	£2,874	£289,275.00
High Beach	3	Redirect footfall and install fences encircling vulnerable ancient trees to reduce soil erosion and compaction	£14,375	£2,500	£214,375.00
High Beach	4	Signposted, unsurfaced 5km loop from Wellington Hill Car Park created with signage to avoid ancient trees. Wood pasture restoration to be focussed around new routes	£54,600	£3,720	£352,200.00
High Beach	9	Introduce traffic incursion measures along Manor Road to prevent car parking within the RPAs of ancient trees	£32,500	£425	£66,500.00
High Beach	1	Surfaced footpaths connecting Wellington Hill linear car park to the existing visitor centre	£10,080	£504	£50,400.00
Chingford	2	Surfaced route from Bury Lane car park to QE Hunting Lodge to act as the primary route bringing visitors from the parking area to the Visitor Centre and related facilities	£84,582	£4,229	£422,902.00
Chingford	5	Clearer waymarking and surfaced (self-binding gravel) route connecting the Bury Road car park with Connaught Water	£81,720	£4,086	£408,600.00
Chingford	6	Construction of a sealed surface path forming a route from Connaught Water to the Visitor Centre. Restoration of damaged areas alongside the path	£75,170	£3,209	£331,890.00
Chingford	15	Improve opportunities for recreational walking around golf course and improve links to Pole Hill viewpoint	£54,700	£3,235	£313,500.00
Chingford	13	Circular route signposted to Warren Pond	£6,875	£250	£26,875.00
Chingford	16	Landscape improvements, including hard surfacing and termination of paths	£360,000	£7,200	£936,000.00
Chingford	17	Control of parking outside the car park at Connaught Water	£25,000	£0	£25,000.00
Leyton Flats	4	Signage installation	£1,250	£250	£21,250.00

<b>Leyton Flats</b>	5	Improvements to established entry and exit points to Leyton Flats (Blue triangle) and development of a furniture strategy to rationalise furniture provision across the site	£150,000	£7,500	£750,000.00
<b>Leyton Flats</b>	6	Significant entrance improvements associated with the Whipps Cross 'mini-holland' scheme and access to Cow Pond	£23,300	£2,330	£209,700.00
<b>Leyton Flats</b>	8	Circular, surfaced trail, with boardwalks where necessary around Hollow Ponds	£285,840	£14,292	£1,429,200.00
		High Beach Costs	£170,910	£10,023	£972,750.00
		Chingford Costs	£688,047	£22,209	£2,464,767.00
		Leyton Flats Costs	£460,390	£24,372	£2,410,150.00
		Overall Costs	£1,319,347	£56,604	<b>£5,847,667.00</b>

*Table 3. Proposed Hub costings including 15% design/consultancy fee*

<b>Area</b>	<b>Approx. Capital Cost</b>	<b>Design/consultancy fee (15%)</b>	<b>Total project implementation cost</b>	<b>Approximate Maintenance Cost</b>	<b>80-year total</b>
<b>High Beach Hub</b>	£170,910.00	£25,636.50	£196,546.50	£10,023	<b>£998,386.50</b>
<b>Chingford Hub</b>	£688,047.00	£103,207.05	£791,254.05	£22,209	<b>£2,567,974.05</b>
<b>Leyton Flats Hub</b>	£460,390	£69,058.50	£529,448.50	£24,372	<b>£2,479,208.50</b>
<b>Total</b>	£1,319,347.00	£197,902.05	£1,517,249.05	£56,604.00	<b>£6,045,569.05</b>

- 4.7 It is important to recognise that the above costs are taken from a base year of 2021. Consequently, as outlined in the governance agreement, it is proposed that the costs will be index linked and updated on the 1st April each year.

## 5 Apportionment of SAMM Contributions

- 5.1 The SAMM programme is costed across the parties to this agreement, considering several factors to ensure that the contribution required by each party reflects the visitor pressure caused by the local authority area and the quantum of development coming forward. The method used to calculate the apportionment of the programme is outlined in Schedule 2, and the final figures are presented below in Table 4.

*Table 4. Apportionment of SAMMs programme across the Local Authorities*

<b>Authority</b>	<b>% of pressure caused by new development</b>	<b>Apportionment (80 yr.)</b>
EFDC	15.66%	£3,886,415.65
WF	68.13%	£16,908,141.66
Redbridge	12.51%	£3,104,665.38
Newham	1.18%	£292,846.13
Enfield	2.52%	£625,400.22
<b>SAMM Programme Total:</b>		<b>£24,817,469.05</b>

- 5.2 The route for securing the contributions will ultimately be for the individual local planning authorities to determine, including the specific approach as to which forms, types and sizes of new residential developments will contribute, but will normally be by way of a Section 106 legal obligation, or from Community Infrastructure Levy monies.