Appendix 1 – Interim Mitigation Strategy for Epping Forest Special Area of Conservation

Interim Approach to Managing Recreational Pressures on the Epping Forest Special Area of Conservation

Epping Forest

1. Epping Forest (the Forest) was a former royal forest and whilst it is London's largest open space, it also provides significant open space opportunities for residents from within and beyond Epping Forest District. It covers some 2400 hectares framed by Walthamstow to the south, the Lee Valley to the west, the M11 to the east and the M25 to the north. The Forest is run by a charity owned and managed by the Corporation of London Corporation under the Epping Forest Act of 1878, which established the City of London Corporation as the Conservators of Epping Forest. A history of the Forest can be viewed at:

   https://www.cityoflondon.gov.uk/things-to-do/green-spaces/epping-forest/heritage/Pages/history-of-Epping-Forest.aspx

2. 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 to 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.

3. Two thirds (1728ha) of the Forest is designated as a Site of Special Scientific Interest (SSSI) with 1,605ha of that area also designated as a Special Area of Conservation (SAC). The site hosts three Annex I habitats, together with the Stag Beetle, a species listed on Annex II.

4. 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.

5. The Forest is also of great historical interest both for the history of its land use as a royal forest and wood pasture, and for specific historical features including two Scheduled Ancient Monuments: Ambresbury Banks and Loughton Camp.

6. SACs are within the top-tier of nature conservation sites within the UK. European legislation, which is transposed into the domestic Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations), and also stipulated within the National Planning Policy Framework (NPPF), affords European sites the highest levels of protection in the hierarchy of sites designated to protect important features of the natural environment.

7. The legislation sets out that where a land use plan, either alone or in combination, is likely to have a significant effect on a European site, the plan-making authority must undertake a Habitats Regulations Assessment (HRA). This applies to Local Plans produced by local authorities, in addition to 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 neighbouring authorities – and where there are any likely significant effects, adverse effects on the integrity of the site must be ruled out[1].

8. A significant proportion and the most integrated part, of the SAC lies within the Epping Forest District Council administrative area. The remainder lies within the London Boroughs of Waltham Forest and Redbridge (the latter of which accommodates a very small proportion of the SAC). As such the three local authorities have a duty, as a Competent Authority under the Conservation of Habitats and Species Regulations 2017, to ensure that planning application decisions comply with those Regulations and do not result in adverse effects on the integrity of the Epping Forest SAC.

9. As a result of concerns relating to recreation pressure on Epping Forest SAC, the authorities of East Hertfordshire District Council, Epping Forest District Council, Harlow District Council and Uttlesford District Council signed a joint Memorandum of Understanding (MoU) relating to Epping Forest[2]. Other signatories on the MoU include the relevant County Councils, the Corporation of London and Natural England. The aim of the Epping Forest MoU is to ensure the parties work together:

   • to collect and analyse data and evidence related to the impacts of proposed development and growth under the Local Plans to provide sufficient and robust evidence on which to base a strategy for the protection of Epping Forest SAC; and
   • to commit to prepare a joint strategy, based on relevant available data and evidence and to an agreed timetable.

[1] Unless there are imperative reasons of overriding public interest.

[2] Memorandum of Understanding 'Managing the Impacts of Growth within the West Essex/East Hertfordshire Housing Market Area on Epping Forest Special Area of Conservation' - http://www.eppingforestdc.gov.uk/phocadownload/ForwardPlanning/mou%20impacts%20of%20growth.pdf

10. The joint strategy is intended to address both the requirement to avoid, or effectively mitigate, adverse impacts on the integrity of the SAC from Local Plan-led development and the requirement to prevent further deterioration of the SAC features. The MoU sets out the need for visitor survey work. The final strategy will also include approaches to mitigating the impacts on the health of the Forest from air pollution, primarily from growth in traffic levels on roads passing through the Forest.

Concerns relating to recreation

11. 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 52 different car-parks and four visitor centres and estimates of visitor use indicate around 4.2 million visitors visit the forest each year[3]. 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. Growing numbers of visitors can result in conflict for space among users and demand for more facilities, such as parking, refreshments and toilets. There are also a number of potential ways recreation could have an impact on the nature conservation interest 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.

12. The Corporation of London currently undertakes on-going assessments of access and options, including focussing on the popular areas, to determine whether they can cope with current access levels. The Corporation manages 33km of surfaced trails to support all-year round use (thereby reducing pressure on other areas) and each year temporary signage is put in place where there are concerns. Despite these measures,

[3] This figure is from the Management Plan consultation and is from 2014.

there is growing concern about the challenges of coping with the high visitor numbers and the potential for damage to the SAC interest if access levels keep increasing. Increased housing development around the SAC will result in more people living nearby and as such may increase recreation use.

Evidence base

13. Existing visitor survey information held by the Corporation of London relates to work undertaken between 2010 and 2014, when a considerable volume of visitor survey work was undertaken at Epping Forest, involving staff and volunteers together with specialist consultancy support. The results are set out in a series of annual reports. The work was undertaken as part of the Branching Out project and funded through the Heritage Lottery Fund. These surveys provide information on overall visitor numbers and the spatial distribution of access within Epping Forest, however the work did not generate home postcodes from a robust sample of visitors (much of the data were collected through on-line surveys and direct observation).

14. Recognising that further evidence was needed to support the development of the Strategy using a more robust methodology, the City of London Corporation, Epping Forest, Harlow, East Hertfordshire and Uttlesford District Councils and the London Borough of Waltham Forest, commissioned Footprint Ecology to undertake a Visitor Survey in 2017. The aims of the survey were to:

    • Identify where visitors originate from in order to understand where new development may result in an increase in use to the SAC;
    • Understand the activities taking place in different parts of the SAC and the relative draw of the Forest for people undertaking particular activities; and
    • Inform mitigation measures, i.e. to gather information on what measures might be effective in changing behaviour, influencing where people go and what they do.

    The Epping Forest Visitor Survey Report 2017 sets out both the methodology used for the surveys and the findings arising from it and can be viewed at http://www.efdclocalplan.org/wp-content/uploads/2018/08/EB715-Epping-Forest-Visitor-Survey-Footprint-Ecology.pdf

15. The survey results have underpinned the preparation of this joint strategy in order to address avoidance and mitigation measures relating to increased recreational pressure arising from local plan-led development. Such strategies are commonly known as a 'Strategic Access Management and Monitoring Strategy' (SAMMS).

16. Survey work was undertaken during October and November 2017 and involved counts of people passing ('tallies'), and interviews with a random selection of people. The surveys took place at 15 locations, carefully selected to provide a good geographical spread across Epping Forest and to

include a range of different types of access points, from large 'honey-pot' car-parks within the Forest to paths around the edge of the Forest with little opportunity to park. Survey work was similar across all survey locations, allowing direct comparison. The survey locations and associated data relates solely to those parts of Epping Forest designated as SAC as opposed to the wider Forest area within the control of the City of London Corporation.

17. Part of the purpose of the Visitor Survey was to identify a 'Zone of Influence' for the purposes of Local Plan policy development and the determination of planning related applications. The Zone of Influence (ZOI) for the Epping Forest SAC has been drawn based on where the 75th percentile of visitors comes from. This is a nationally recognised approach which has been adopted by other authorities across the country for the purposes of identifying Zones of Influence surrounding both SACs and Special Protection Areas. The ZOI for the Epping Forest SAC extends for a distance of 6,176metres from the SAC boundary. The median distance is 3,084 metres. Maps showing the ZOI and the median distance are attached at Appendix 1. The local authority administrative areas which fall within the ZOI (either in whole or part) are as follows:

    Epping Forest District
    London Borough of Waltham Forest
    London Borough of Redbridge
    Harlow District
    Broxbourne Borough
    Brentwood Borough
    London Borough of Newham
    London Borough of Enfield
    London Borough of Hackney
    London Borough of Haringey
    London Borough of Tower Hamlets
    London Borough of Barking and Dagenham
    London Legacy Development Corporation

18. As a result any additional homes built within the ZOI, when taken in combination with other plans and projects, have the potential to increase pressure on the Forest, and have a Likely Significant Effect on the health of the Forest. There is no way of preventing more people who come to live in the ZOI as a result of new residential development from visiting the Forest in order to avoid placing further pressures on it. Therefore there is a

need to undertake measures to mitigate these Likely Significant Effects and for new developments to make a contribution towards their implementation.

Mitigation Measures:

19. A number of costed schemes and people resources needed to support the implementation of measures have been identified in partnership with the City of London Conservators. These have been developed taking into account the mitigation measures needed for the whole of the SAC area rather than on an authority by authority basis, recognising that visitors from one local authority administrative area often go to a part of the SAC that lies within a different local authority administrative area. The schemes identified, and their associated costings have been developed and programmed to cover the period up to 2033. Year 1 is 2019. The periods are taken as being for the purposes of project costings is from 1 April 2019 – 31 March 2033. These are set out in Table 1 below.

Strand 1a – Mitigating Recreational Impacts							
Descriptor	***Capital Initiation Costs***	***Capital Funding Duration***	***Annual Costs or other***	***Funding Duration (Years)***	***Total Cost***	***Cost Calculation Notes***	***Rationale and justification***
Traffic control and car impact reduction measures and monitoring, as part of Integrated Forest Transport Strategy (including physical management of car parks)	n/a	n/a	tbc	Capital Years 2-10	£350,000	➢ Road closure/Traffic Regulation Orders (e.g. Fairmead Road) (£35,000 in total by Year 5); ➢ Car Park controls (gates, CCTV) (£18,000 per car park – 5 car parks – one per year Years 2-6) for seasonal restrictions and night-time control of access; ➢ Re-locating car park capacity and resurfacing/surfacing ➢ Improved access for non-car use – incl. new, safer crossing points over main roads (A104, A121) to provide links along Forest visitor trails and circuits from peripheral Forest entrance areas (e.g. Honey Lane, Chingford-The View 'hub')	➢ Re-direct/exclude cars from more sensitive sites & during sensitive periods of the year, (e.g. heathlands in SAC and relocate capacity to deal with increased visitor pressure). ➢ Re-locating car park capacity – closures and expansions with additional surfacing improved surfacing possible (e.g. increasing car park capacity away from High Beach/improved surfacing at Chingford hub) ➢ seasonal car park closures and seasonal capacity shifts;

High Beach and Honey Lane Quarters 'hub' Improving resilience: increasing visitor capacity while reducing damage	n/a	n/a	Tbc	Capital and revenue projects (a 5 – 6-year implementation period)	£200,000	➢ Master-planning costs to examine the options for increased visitor numbers while reducing impacts on SAC trees, vegetation and soils (especially steep slopes) ➢ Costs include new, extended & re-aligned paths & circular walks, provision of board-walk/crossing points at Wellington Bog and beech forest streams; pre-emptive ancient tree root protection /soil erosion prevention through fencing, re-siting/enlarged refreshments facilities away from SAC	➢ The recent capital investment in parking with ECC (Highways) has dealt with current average numbers at High Beach but investment would be required to prevent further increase in visitor numbers, particularly weekend peak visits and reduce impact. ➢ redirecting access and provision of walk-ways to move visitors away from sensitive areas and soils including steep slopes, beech trees, heathland bog and acid grassland habitat ➢ attract new visitors away from High Beach to prevent and try to reduce pressure on this 'honeypot'
Leyton Flats					£200,000	***Detailed wording is awaited from the Conservators but the proposal is to undertake masterplanning work for the site. Therefore an initial cost has been provided based on the High Beech project costs.***	
Physical management of paths and tracks across other SAC areas *Dealing with increasing wear-and-tear.*	n/a	1 year (easy access path)	£15,000 (easy access path)	14 years for annual work plus £15,000 for easy access path repair/upgrade in SAC (excluding High Beach Masterplan)	£225,000	➢ Upgrade easy access path– @ £15/m - Lords Bushes/ Knighton (Year 3) (£15,000) ➢ Annual repair and upgrade to SAC ride/path/Multi-user trail (MUT*) network to cope with increased annual use @ £30/m – 0.5km per year each year (£15K)	➢ Upgrade easy access path/ "visitor offer" to take greater visitor pressure away from central area and towards urban edge of Forest nearer London transport ➢ Maintenance of access infrastructure (especially *MUTs) to accommodate increase use and protect vulnerable beech forest and heathland vegetation (excludes areas within High Beach Masterplan (see above).
Signage at transport nodes- Map and Interpretation including installation			£2500	4 years – one per year	£10,000	➢ Map and Interpretation board signposting sustainable routes to Forest at main train stations: Chingford, Loughton, Theydon Bois, Epping	➢ Increase use of public transport access to Forest and reduce car impact
Interpretation roll out Forest-wide			£2000	10 years	£20,000	➢ Installation of interpretation boards across Forest SAC	➢ Access information – panels and waymaking/SAC-specific habitat information

						areas encouraging visitors to stay local	interpretation
Visitor engagement campaigns			£2000	10 years	£20,000	➢ Production of promotional material; banners, leaflets, pop-up stalls to assist volunteer Forest Ambassadors (see below)	➢ Community out-reach work (also see above work for Mitigation Officer tasks)
Bicycle hire scheme			£6000	Year 3	£6,000	➢ Installation of cycle parking drop off points working in partnership with cycle hire business in Forest and surrounding open spaces e.g. Lee Valley	➢ Encourage sustainable travel and sustainable links to other open spaces to spread visitor pressure
Cycle Map			£2000	Year 3	£2,000	➢ Production of cycle map to encourage visits by cycle / cycle hire instead of car	➢ Reduce car travel within SAC road network
SAC Ambassadors			£20,000	Years 2-5 (to be reviewed in Year 5)	£60,000	➢ Campaign, recruitment and training of SAC Ambassadors to run educational activities, roadshows and pop ups in Forest on topics – officer post part time: ➢ Sense of place (awareness Forest is special place) ➢ Share the path (codes of conduct) ➢ Leave no trace (litter) ➢ Monitoring/recording access	➢ Leave the car (alternative routes) -promoting alternative routes and awareness of impacts of dogs on cattle grazing areas and heathland ground-nesting birds (e.g. Woodcock) ➢ Path – sharing conduct will be vital as pathways become busier to accommodate increased visitor peaks ➢ Epping Hounds project (engaging with dog owners to reduce impacts of dogs on the Forest habitats and heathland birds, grazing deer)
Strand 1b – Avoiding and Mitigating Recreational Impacts							
Mitigation Strategy Development & Visitor Masterplan Consultancy advice	n/a	n/a	70 days at £500 per day average	Year 1 & Year 8 (for review) ESTIMATED NO. DAYS – 70 days	Up to £35,000	➢ up to 60 days' consultancy in Year 1; ➢ 10 days' consultancy for review and report and independent oversight of Strategy in Year 8	➢ Masterplan: engage consultant to produce spatial strategy for visitors; ➢ Project plan and refine costs for proposed SAMMs (below) and advise on relative contribution of SANGs ➢ Ensure Habs Regs Assessments of SAMM Projects in SAC if required by NE ➢ Liaison with NE, MoU LPAs and CoL officers to pull together and report on detailed mitigation options and requirements ➢ Involved with recruitment of the delivery

							officer post (see below)
Mitigation Strategy Delivery Officer (Project Management and field monitoring experience)	£10,200	1 Year	£50,477	Years 2-14 13 Years	£700,099	➢ Scale D SCP 1035 £32,000 + Outer London Weighting £3,350 = £35,350 + 31.8% On Costs £11,245 (overheads, workstation training) + ULEZ compliant electric lease £6,289	➢ Key liaison person for project consents from Natural England and any detailed assessment work required by NE ➢ Contribute to new Forest Transport Strategy and liaise with highways authorities ➢ Procurement, implementation and supervision of contractors ➢ Management of SAC Ambassadors and volunteers ➢ SAC part of Sustainable Visitor Strategy implementation - coordinating with Visitor Services Team ➢ Advice on SANGs development possibly including CoL 'buffer lands' ➢ SAC Impacts Monitoring Strategy ➢ Community out-reach ➢ Annual report to all Mitigation Strategy/MoU partner organisations and contributing developers
Apprentice	£10,200	7 years	£25,807	Years 2-14 13 years	£396,013	➢ Level 3 London Living Wage £18,990 + 31.8% on-costs £6,040 (overheads, workstation, training,) + College Sponsorship £2,070 – 2 years = £25,807	➢ Lowest cost option to ensure assistance for Mitigation Delivery Officer, particularly in monitoring projects and gathering evidence on biodiversity impacts. ➢ assist with community out-reach and volunteers supervision.
Strand 2 – Monitoring and Evaluating Mitigation Impacts							
Visitor Surveys (incl for relevant SANGS and buffer lands)	£30,000	4	n/a	Years 1, 4, 9	£75,000	➢ Delivery by external consultants	➢ Visitor survey to include survey across two periods in any one calendar year– including summer months (Jun -Aug incl) ➢ The Year 1 survey to cover the Jun-Aug period only – to be used to build on the outputs from the Autumn 2017 survey. ➢ Expanded to include SANGs sites where applicable to look at interactions ➢ To assess relative contributions of local authority areas and changing distributions of visitors and changing visitor demands
Monitoring visitor impacts on soils and ecology of SAC				Baseline (by Year 2, then Years 4, 8, 12)	£74,000	➢ Delivery by External consultants and possibly FPPs with volunteer assistance	➢ Baseline and 'controls' set-up plots on heathlands and at visitor pressure areas by Year 2 ➢ Repeat monitoring of vegetation plots Years 4,

				plus bi-annual FPPs (£2,000 each year – starting Year 1 or 2 – in 8 years to Year 14)			8, 12, 16 and selected beech tree health ➢ Bi-annual Fixed-Point Photograph (FPPs) monitoring of main erosion areas ➢ Soil compaction/penetrometer testing – repeat plots
Rolling External Project Evaluation	n/a	n/a	£5,000	Every two years – excluding Years 1 and 8	£30,000	➢ Delivery by External consultants (excluding Years 1 and 8 covered by Mitigation Development consultants)	➢ External consultancy to evaluate projects annually and provide briefing reports to Mitigation Strategy Delivery Officer and Oversight Group
Strand 1 Sub-Total					£2,414,112		
Strand 2 Sub-Total					£179,000		
Total for period to 2033					**£2,593,112**		

Review of costs:

20. It is important to recognise that the above costs are taken from a base year of 2018. Consequently, it is proposed that the costs will be updated on 1 April each year to take account of inflation. Build costs will be based on the Construction Output Price Indices published by the Office for National Statistics whilst staff and consultancy costs will be based on any annual wage increase proposed by the City of London Conservators, changes to on-costs as a result for changes in nationally set levels of employer contributions for National Insurance purposes, and CPI for consultancy costs. The sums of monies secured by way of a Section 106 legal obligation will be subject to an inflation related clause. In addition, the costs of individual components may be reviewed as part of the annual update based on the outcomes of individual project evaluation if this identifies that there has been either an underestimation or overestimation of the costs attributed.

How the costs of mitigation will be secured:

21. 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. It should be noted that the monies secured are not subject to Community Infrastructure Levy Regulations pooling restrictions[4]. Furthermore, contributions made from Community Infrastructure Levy monies are not precluded from being spent in another local planning authority area but the relevant Council's Regulation 123 list must identify the provision of the improvement, upgrading and management of open space. This does not, however, need to be specific to an individual site. It should be noted that Prior Approval

applications for changes of use to residential under the Town and Country Planning (General Permitted Development Order) are subject to consideration under the Habitats Regulations 2017 and will therefore still be liable for making contributions. However, this is achieved via a separate process to that of planning applications.

22. A key consideration with regard to securing any contributions is that they comply with the three 'tests' set out in the Community Infrastructure Regulations (Regulation 122) in that:

A planning obligation may only constitute a reason for granting planning permission for the development if the obligation is—
(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.

23. In order to ensure compliance with Regulation 122 an assessment has been undertaken with the regard to the proportion of visitors likely to arise from additional residential developments within the ZOI by local authority area. This has then been used to 'divide' the overall mitigation costs to provide an overall level of contributions that would need to be secured within each local authority area over the period to 2033. The survey information provides a robust indication of the proportion of visitors originating from each local authority area within the ZOI. This information has then been extrapolated in order to define the overall financial contributions required towards mitigation from each local authority area. It is important to recognise that the number of people surveyed is not a direct indication of the number of people likely to visit from each local authority area. Consequently the use of percentages has been used to provide the likely proportion of visitors that would arise from each local authority area based on the number and distribution of visitors surveyed. Such an approach is consistent with approaches undertaken elsewhere in England.

24. The overall analysis of the percentage of visitors arising from each local authority administrative area in order to understand where the greatest pressure is likely to arise from is set out in Table 2 below and has been assessed on the following basis:

0 – 6.2 km ZOI: This is based on the percentage of visitors arising from each individual authority area within the entire ZOI

0 – 3 km: This is based on the percentage of visitors arising from each individual authority area within this area alone. This has been provided in order to reflect the fact that 93% of all visitors within the entire ZOI actually live within 3km of the Epping Forest SAC boundary.

3 – 6.2 km: This is based on the percentage of visitors arising from each individual authority area who live within this part of the ZOI based on the total number of interviewees who live within the ZOI.

0 – 3 km: This is based on the percentage of visitors arising from each local authority area who live within this area only.

The 'Competent authorities only' column provides the percentage of visitors arising from each of the competent local authority areas that arise from within that authority area (i.e. excludes those visitors who live within the London Boroughs of Enfield and Newham).

Local authority	0-6.2km	0-3km	3-6.2km	0-3km	Competent authorities only
Epping Forest DC	49.13%	48.39%	0.74%	52.00%	52.28%
LB Waltham Forest	34.24%	34.24%	0.00%	36.80%	37.00%
LB Redbridge	11.67%	9.93%	1.74%	10.67%	10.72%
LB Hackney	1.74%	0.00%	1.74%	0.00%	
LB Newham	1.24%	0.25%	0.99%	0.27%	
LB Enfield	1.24%	0.25%	0.99%	0.27%	
Broxbourne BC	0.74%	0.00%	0.74%	0.00%	
Harlow DC	0.00%	0.00%	0.00%	0.00%	
Brentwood BC	0.00%	0.00%	0.00%	0.00%	

25. The above demonstrates that the vast majority of visitors arise from within the three local authority areas of Epping Forest District and the London Boroughs of Waltham Forest and Redbridge, which are also the competent authorities under the Habitats Regulations 2017. Visitors arising from the other local authority areas are significantly less and, for the main part, visit on a less frequent basis. Consequently, when applying the CIL Regulation 122 'tests' set out above, it is considered that, on the basis of the current evidence, and having also considered the costs and potential complexity of administration, that a proportionate and pragmatic approach would be to collect contributions to cover the costs of implementing the Strategy only from the competent authority areas of Epping Forest District and the London Boroughs of Waltham Forest and Redbridge. This reflects the scale, distribution and frequency of future visitors likely to visit the parts of the Forest designated as an SAC and also takes into account the potential costs of preparing Section 106 Obligations and subsequent administration which may cost more than the actual monies being collected.

26. On the basis of the above the costs to be apportioned to the Competent authorities are as follows:

Local authority	Apportionment (Percentage)	Apportionment (financial) to 2033
Epping Forest District Council	52.28%	£1,355,679
LB Waltham Forest	37.00%	£959,452
LB Redbridge	10.72%	£277,982

Futureproofing through the provision of Strategic Alternative Natural Green Space:

27. It is important to recognise that there are several strategic sites that have been proposed for allocation within the Epping Forest District Local Plan Submission Version which lie within, or partly within the 6.2km Zone of Influence, namely the Garden Town Communities of Latton Priory and Water Lane, as well as at North Weald Bassett and south of Epping. All of these sites are currently on greenfield land such that visitors to the Epping Forest currently originating from these locations are either non-existent or minimal. However, the sites will individually and collectively result in a significant increase in residents. Without any on-site provision of strategic levels of Natural Green Space of an appropriate form these new communities are likely to add further to recreational pressures on the Forest. Consequently, as part of the Masterplanning of these sites there will be an expectation that Strategic Alternative Natural Greenspace will be an integral part of their design. Dependent on the scale and form of such Green Space there may be a need to secure some financial contribution towards the implementation of the above projects and associated activities. This is because the Green Space may not provide all of the attributes necessary to attract all users away from the Forest. It should be noted that the provision of Greenspace at Water Lane and Latton Priory in particular could also contribute to 'futureproofing' development in terms of recreational pressures on those areas of Epping Forest outside of the SAC that are designated as Sites of Special Scientific Interest (SSSIs), the Lee Valley Special Protection Area/ Ramsar Sites and the Harlow Woods SSSI.

28. The following allocations within the Epping Forest District Local Plan Submission Version should therefore be required to provide Strategic Natural Green Space:
    - Latton Priory
    - Water Lane
    - North Weald Bassett
    - South of Epping Masterplan Area

At present no other opportunities outside of the Epping Forest District administrative area have been identified as providing the potential to act as Strategic Alternative Green Space.

Monitoring and Review:

29. It is important to recognise that whilst the schemes/resources identified, and the costs attributed cover the period up to 2033 this is an Interim Strategy. Monitoring of both the projects themselves, and further visitor surveys have been identified within the costings set out in Table 1 above. This includes undertaking a further Visitor Survey during the period June – August 2019 following which this Interim Strategy and, if necessary, the ZOI will be reviewed. In addition additional and/or alternative projects may arise in the future, or income generation created such as to off-set some of the costs identified above. Such projects and income-generating activities could, for example, involve the potential use of City of London Corporation owned 'buffer lands' as Strategic Alternative Natural Green Space, the need for increases in Keepers/Rangers or as a result of income gained from car parking charging or bike hire. It is also recognised that during the lifespan of the indicated projects there may be changes in terms of Local Plan Housing Requirements across the Zone of Influence. Any of these may result in a need to review and amend:

    i) The projects identified;
    ii) The costs identified; and
    iii) The apportionment from which contributions are sought in terms of the sum of monies that each authority is required to secure including the addition of authorities not currently identified above.

30. In reviewing further iterations of the Strategy beyond that indicated for 2019, it is important that an appropriate balance is achieved in terms of ensuring that the schemes proposed are achieving their purpose, and providing certainty to both the development industry and local planning authorities in terms of the requirements being sought such that neither the Strategy or the ZOI is reviewed year on year (this is distinct from the annual review of costs referred to in paragraph 20 above). Consequently, it is proposed that further reviews will be undertaken following the receipt of the outputs from the Visitor Surveys proposed in Years 4 and 9.