

**From:** Green, Sandra [REDACTED]

**Sent:** 31 August 2023 11:53

**To:** Section 62A Applications <section62a@planninginspectorate.gov.uk>

**Subject:** S62A/2023/0019 (UTT/23/1583/PINS) Land to the north of Roseacres, between Parsonage Road and Smiths Green Lane, Takeley - National Trust Representation

Good Morning Inquiries and Major Casework Team,

The proposed development is approximately 1.6km from the SSSI, National Nature Reserve areas and ancient woodland of Hatfield Forest which extends over 424 hectares, including Wall Wood and Woodside Green. The area has been owned and managed by the National Trust since 1924. Of greatest significance is that Hatfield Forest is the finest surviving example of a small Medieval Royal Hunting Forest. The Forest's ecological and historic importance is reflected in its designations - for its considerable ecological significance and especially for its veteran trees and old growth woodland on undisturbed soils.

The forest is experiencing rapid and unsustainable growth in visitor numbers which is putting it under considerable pressure and there are signs that the SSSI, NNR and other designated/protected features there are being damaged. In order to advance its understanding of these issues as well as an understanding of visitor numbers, origin and behaviour when visiting the Forest, the Trust, with support from Natural England (NE), commissioned consultants Footprint Ecology to undertake visitor surveys and prepare an impact management report to help build a practical strategy for the Forest going forward. This established a 'Zone of Influence' (ZOI), within which this site falls. Natural England advises that where relevant, planning decisions are informed by this.

The Footprint Ecology report describes the issues arising from recreational pressure in more detail and recommends the development of a strategy to mitigate these impacts in order that new development can meet planning policy requirements (including NPPF para.174-180). There are also duties on LPA's under section 28G(2) of the Wildlife and Countryside Act 1981 to take reasonable steps as part of the authority's functions to further the conservation and enhancement of SSSI's. Furthermore, there is a specific obligation on an authority under section 28I where it is proposing to permit an operation likely to damage a SSSI, to give Natural England prior notice.

Having regard to the evidence and in accordance with the above requirements and the advice of Natural England, it is considered that the impacts of the development on Hatfield Forest should be addressed. New housing development within the ZOI will contribute further (both individually and cumulatively) towards recreational pressure on the Forest.

The applicant acknowledges the issue in their Planning Statement, Ecology Report, and Draft Heads of Terms at Appendix C of the Planning Statement. In which the Draft HOT include (6f) a contribution towards the visitor and botanical monitoring and mitigation works at Hatfield Forest, for or on behalf of the National Trust.

Based on recommendations set out in the 'Visitor Survey and Impact Management Report', and as referred to in Natural England's letter, the National Trust, in consultation with Natural England, East Herts, Epping Forest, Harlow and Uttlesford Councils has prepared a costed Mitigation Strategy. This includes a costed package of mitigation measures.

For the proposed development we consider the following mitigation would be appropriate:

#### **On-Site Mitigation**

On-site measures which would help relieve the pressure on Hatfield Forest should be provided. These should take the form of:

- High-quality, informal, semi-natural areas, to be provided prior to first occupation of the dwellings (including a dog walking circuit and dogs off lead area);
- Any other on-site mitigation as advised by Natural England.

However, this alone would not mitigate the impacts of increased recreational pressure on Hatfield Forest arising from the development. Hatfield Forest offers other visitor experiences which could not be replicated on a new site. It is used for a range of recreational activities including jogging, cycling, wildlife watching, family outings and photography. It also includes visitor infrastructure such as a café, toilets and education building. This makes it vulnerable to current and future demand. Even if on-site mitigation is proposed, it is considered that there will still be a residual recreational impact on Hatfield Forest which needs to be mitigated.

#### **Off-Site Mitigation**

- **A financial contribution of £14,400 to the National Trust for use at Hatfield Forest towards visitor and botanical monitoring and mitigation works.** This would be proportionate with contributions secured for other developments.

The Hatfield Forest Mitigation Strategy is being used by the property team to address recreational impacts at Hatfield Forest. A copy of this can be provided if required.

As an indication of some costs, the Mitigation Strategy sets out that independent Visitor Surveys will take place every 5 years at a cost of £30,900, annual Impact Surveys will take place at a cost of £2,522 and soil compaction analysis will take place annually at a cost of £3,090.

If, however, appropriate mitigation is not secured to address the issue set out above then the National Trust objects to this application.

Please acknowledge receipt of these comments and take them into account when determining the application.

Kind regards,

Sandra



Sandra Green BSc (Hons), PGDip, MRTPI  
(Pronounced: Saan-druh)  
Assistant Planning Adviser  
National Trust  
East of England Office



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