



## **Uttlesford District Council Statement of Common Ground With National Trust December 2024**

This Statement of Common Ground (SoCG) provides a simple SoCG that confirms that both parties have been working closely together during the preparation of the Local Plan in connection with the long-term protection of Hatfield Forest as a Site of Special Scientific Interest (SSSI) and National Nature Reserve.

The National Trust have provided comments on a range of issues in relation to the Regulation 19 consultation. These include matters relating to:

- a new country park in the south of the District
- air quality impacts from the proposed allocation at Land North of Taylors Farm
- the absence of governance arrangements to enable the National Trust to receive SAMMs contributions and deliver the identified mitigation and
- some suggested modifications to the Plan.

These are set out in Appendix A.

We have been working together, and both parties agree on several proposed modifications to some of these issues (see attached schedule at Appendix B).

We acknowledge there are a small number of issues outstanding that we propose to cover through the examination in public process. However, it is not thought there are any significant outstanding matters.

### **Signatories:**

National Trust  
Leigh Freeman  
General Manager for Hatfield Forest

**Signature:**



**Date: 9 January 2025**

Uttlesford District Council  
Andrew Maxted  
Planning Policy Manager

**Signature:**



**Date: 19 December 2024**

## Appendix A: Issues at Regulation 19

Comments predominately focus on the Spatial Strategy, notably the South Uttlesford Area Strategy, to ensure the long-term protection of Hatfield Forest which is designated as both a National Nature Reserve (NNR) and a Site of Special Scientific Interest (SSSI). The first column in the table below is constructed from the National Trust letter in response to the Local Plan Regulation 19 consultation and is a copy of the relevant extracts of text concerning the Hatfield Forest NNR and SSSI (referred to in the table simply as 'Hatfield Forest' rather than repeating its statutory designations each time).

National Trust Regulation 19 position	Uttlesford District Council position / response
<p>For over a decade Hatfield Forest has been experiencing impacts from growth in visitor numbers, partly attributable to the rise in housing in the local area, which has led to habitat loss occurring and not recovering. Based on evidence commissioned by the National Trust and following advice from Natural England (NE), the Trust has prepared the Hatfield Forest Mitigation Strategy in consultation with NE, Uttlesford, East Hertfordshire, Epping Forest and Harlow Councils that sets out costed Strategic Access Management and Monitoring (SAMMs) measures to assist in mitigating the impacts of housing growth within an identified Zone of Influence (ZOI) on the Forest.</p>	<p>Acknowledged. The SAMM has been integrated into the evidence base for the Local Plan and incorporated into proposals for safeguarding of Hatfield Forest.</p> <p>The Council have applied the Zone of Influence for Hatfield Forest in its site selection methodology and will be part of its contributions-based funding program to determine which proposals are required to contribute to the SAMM. The Zone of Influence is shown in Appendix C.</p>
<p>...the Trust considers that financial contributions towards SAMMs alone will not adequately address the pressure on the Forest. A strategic solution is required which includes:</p> <ul style="list-style-type: none"> <li>(i) Mitigation Strategy (SAMMs) for Hatfield Forest;</li> <li>(ii) Provision of high-quality Green Infrastructure (GI) within new development sites (on-site provision) to provide a recreational resource close to where people live which then limits the need for new residents to travel to Hatfield Forest for recreational purposes; and,</li> <li>(iii) Provision of new strategic open space such as Suitable Alternative Green Space (SANGs) and a new country park in the</li> </ul>	<p>Noted.</p> <ul style="list-style-type: none"> <li>i – The Council understands the SAMM has been prepared and is working on a Governance Agreement with the other local authorities to enable it to collect contributions from developments and pass these on to the National Trust to enable them to deliver the mitigation measures utilising the Zol as set out above. The finer details for the arrangements for collecting funds will be agreed at a later date, either during the Examination in Public process or shortly after. The mechanism for this is likely to be similar to that which has successfully run for the Essex Coast RAMS in recent years.</li> <li>ii and iii – Each proposed allocation is expected to provide a range of green infrastructure on-site, including open space that meets SANG standards. This is reinforced throughout the Plan, including at</li> </ul>

<p>south of the District, to be planned for through allocations in the new Local Plan with appropriate delivery mechanisms secured.</p> <p>Each one of these measures in isolation would not be sufficient to mitigate the impacts of the housing growth proposed in the new Local Plan on Hatfield Forest. They must form a package of measures.</p> <p>The Trust acknowledges the considerable engagement and collaborative working to date by and with Uttlesford District Council, neighbouring local authorities and Natural England. However, at the time of writing, the necessary governance arrangements are not in place to enable the Trust to receive contributions from the local authorities. Further work is needed to secure these and to ensure the mitigation package is deliverable and that the National Trust can start implementing the measures.</p> <p>Additional comment added post Regulation 19 during further engagement: Progress on this has been slow and needs to be progressed expediently to ensure that new residential development within the Zone of Influence, which is already coming forward, does not give rise to further recreational impacts on Hatfield Forest.</p>	<p>the following paragraphs, which clearly show how the Plan will help with the long-term protection of Hatfield Forest:</p> <ul style="list-style-type: none"> <li>• Paragraphs 6.10 and 6.20 in relation to Great Dunmow</li> <li>• Paragraphs 6.22 and 6.26 in relation to Takeley</li> </ul> <p>Furthermore, the Plan should be read as a whole, for instance on the delivery of infrastructure and the management of such assets as set out in Core Policy 5 Providing Supporting Infrastructure and Services; Core Policy 39 Green and Blue Infrastructure; CP67a Management of Public Open Space whichever may be appropriate, which addresses the delivery mechanisms.</p> <p>The Council will continue to work closely with the individual developers on the masterplans for each of the proposed allocations to ensure that the requirements are fulfilled as they progress to planning applications once the Plan is Adopted.</p> <p>The Council is committed to working with the National Trust through the remainder of the Examination process and beyond where issues are considered to remain.</p>
<p>The Publication Version draft local plan proposes to allocate around 3,150 new homes within the Hatfield Forest ZOI at four strategic locations, the largest of which is East Takeley/Little Canfield (1,506 dwellings). This is approximately 1.8km from the Forest.</p> <p>Additional comment added post Regulation 19 during further engagement: Given the proximity of Takeley to Hatfield Forest, it must be ensured that a strategic solution to mitigating recreational pressure on the Forest is in place through the Local Plan and delivered prior to the occupation of</p>	<p>The Council acknowledges the Trust's position but considers that the requirement for SANG to be accessible prior to first occupation has the potential to affect the viability and deliverability of its strategic allocations and will instead require the SANG to be delivered in the early phases of development. This is reiterated in Core Policy 39 and Core Policy 5.</p>

<p>any new dwellings. It is noted that Core Policy 10a (Takeley Strategic Allocation Comprehensive Development Framework) states that a comprehensive development framework will be prepared, which will include a SANG of at least 30 hectares.</p>	
<p>The Trust also has concerns about the proposed SANG and Country Park provision in the draft plan.</p> <p>Chapter 2 (Spatial Portrait), Para 2.27, Bullet Point 4 identifies the opportunity to create a Country Park providing multi-functional benefits. This would also help to mitigate the visitor pressures at Hatfield Forest, but a site is not allocated for this in the Publication Version draft plan, with the only proposed Country Park being at Saffron Walden. This is outside the Hatfield Forest Zone of Influence.</p> <p>Although the Plan seeks to ensure the delivery of on-site high quality green space to mitigate impacts from the proposed new allocations, The Trust remains concerned that there are no green infrastructure sites currently proposed in the south of the District to meet formal Natural England Country Park criteria during the Plan period to 2041. Therefore, pressure on the forest from the existing population will continue.</p>	<p>Uttlesford District Council needs to achieve an adopted plan in order to control further speculative development and the next plan can address the longer-term country park ambitions. The NPPF does allow for such ambitions to be set out in Local Plans. It should be acknowledged that the Local Plan allocations at Stansted Mountfitchet, Takeley and Great Dunmow will deliver a significant amount of new open space within the Zone of Influence that will help to alleviate recreational pressure on Hatfield Forest, including SANG, whilst proposals for a Country Park in the South Area are progressed further. The level of provision required for each of the proposed allocations derived from the LUC study which was carried out in consultation and engagement with, Natural England and commissioned by UDC.</p>
<p>Core Policy 4 (Meeting our Business and Employment Needs) proposes an 18ha employment allocation at Land North of Taylors Farm. Removing the site of the proposed employment allocation from the existing Countryside Protection Zone (CPZ), would bring development closer to Hatfield Forest. The proposed employment allocation could significantly increase the number of HGVs using The Street (B1256), with associated air quality impacts. Air quality impacts should be assessed at the Local Plan stage, rather than individual planning applications, as the outcome of assessment may necessitate a change to the proposed site allocation.</p>	<p>The site promoter is preparing a planning application for Land North of Taylors Farm, with submission expected in March 2025. The proposal has been screened in for EIA, and an Air Quality Assessment will be required as part of the planning application. Given the advanced stage of preparation of the application, the Council considers that the development management process is the appropriate place to consider the potential impacts.</p> <p>The Council will continue to work closely with Natural England and the National Trust on the air quality issues and will review the situation once the results of the modelling of air quality impacts are known in early 2025, including consideration of any potential modifications to the Plan which can be</p>

	addressed through the Examination in Public.
<p>Core Policy 15 Green and Blue Infrastructure in the South Uttlesford Area requires all development proposals to protect and enhance Green and Blue Infrastructure and assets in the South Uttlesford Area. It is unclear which development(s) contributions will be sought from, including those specified at i. Great Dunmow, and ii. Takeley. Would contributions be sought from major/minor/all developments of one or more dwellings? It is also unclear when and how these strategic projects will be delivered. The policy needs to be modified to clarify which developments will be required to contribute to the open space provision at Great Dunmow and Takeley.</p>	<p>Core Policy 15 relates to the South Uttlesford Area so this applies to those strategic allocations in that area only in accordance with Core Policy 2 (i.e. Great Dunmow and Takeley proposed strategic allocations). These will be developed in accordance with the development frameworks in Appendix 4. The Council have worked with the developers throughout the plan making process on Memorandums of Understanding. Further engagement will continue through the development management process.</p>

**Appendix B: Confidential Draft: Schedule of Proposed Modifications (December 2024) - Uttlesford District Council Local Plan 2021 – 2041**

Modification Number.	Respondent	Person ID	Core Policy No.	Paragraph No.	Page No. of Submission Local Plan	Suggested Modification	Reason for Change
6	National Trust	ANON-QNH5-RD4W-W	N/A	2.25	23	Amend footnote 30 as follows to make sure the hyperlink works:  Footnote 30: <a href="http://www.nationaltrust.org.uk/visit/essex-bedfordshire-hertfordshire/hatfield-forest/our-work-at-hatfield-forest">www.nationaltrust.org.uk/visit/essex-bedfordshire-hertfordshire/hatfield-forest/our-work-at-hatfield-forest</a>	Correction.
7	National Trust	ANON-QNH5-RD4W-W	N/A	2.25	23	Amend footnote 31 as follows:  <b>FOOTNOTE 31: FOOTPRINT ECOLOGY (2022) Hatfield Forest Visitor Survey and Impact Management. Available online: LINK</b>	Correction.  Awaiting publicly accessible hyperlink to be sent from National Trust
8	National Trust	ANON-QNH5-RD4W-W	N/A	2.27	24	Amend Bullet 3 in Paragraph 2.27 as follows:  to adopt and implement the Hatfield Forest <b>MITIGATION STRATEGY</b> <del>NINRSANG</del> scheme-developed in conjunction with neighbouring Districts, <b>NATURAL ENGLAND</b> and National Trust <b>TO</b> mitigate visitor pressure.	For additional clarity.
92	National Trust	ANON-QNH5-RD4W-W	N/A	9.163	197	Amend Paragraph 9.163 as follows:  Natural England, and the National Trust, <b>UTTLESFORD DISTRICT COUNCIL AND NEIGHBOURING AUTHORITIES</b> have developed a Mitigation Strategy outlining a package of on-site Strategic Access Management Measures (SAMM) to <del>protect and restore the condition of Hatfield Forest</del> <b>MITIGATE THE IMPACTS OF NEW</b>	For additional clarity.

						<b>RESIDENTIAL DEVELOPMENT.</b>	
93	National Trust	ANON-QNH5-RD4W-W	CP38	N/A	199	<p><b>Protection of Hatfield Forest</b>  Where appropriate, within the <b>HATFIELD FOREST ZONE OF INFLUENCE (11.1KM)</b> identified areas as shown on the Policies Map and Appendix 12.;</p> <p><b>VI) contributions WILL BE REQUIRED</b> from proposed <b>NEW</b> residential developments <b>WHICH RESULT IN A NET INCREASE IN DWELLINGS</b> will be secured towards <b>THE DELIVERY OF THE STRATEGIC ACCESS MANAGEMENT MEASURES (SAMM) AS SET OUT IN THE HATFIELD FOREST MITIGATION STRATEGY.</b> recreational mitigation measures Priority Habitat enhancement/ connectivity at Hatfield Forest Site of Special Scientific Interest (SSSI) and National Nature Reserve (NNR).</p> <p><b>VII) HIGH QUALITY ON-SITE GREEN INFRASTRUCTURE PROVISION SHALL BE COMPLETED AND ACCESSIBLE WITHIN THE EARLY PHASES OF DEVELOPMENT WITHIN NEW MAJOR DEVELOPMENTS, INCLUDING NATURAL AND SEMI-NATURAL GREENSPACE, DOG WALKING ROUTES AND DOGS OFF-LEAD AREAS, TO BE SECURED THROUGH PLANNING CONDITIONS.</b></p>	
	National Trust	ANON-QNH5-RD4W-W	CP38	N/A	199		



### Appendix C: Hatfield Forest Zone of Influence

