



Strategic Planning & Research Unit

For and on behalf of  
**Peer Group PLC**

**Epping Forrest Local Plan Examination  
Response to Inspectors MIQ's  
Matter 10: Natural Environment, Landscape Character  
and Green & Blue Infrastructure**

**Ongar Park Estate  
North Weald Basset**

**Prepared by  
Strategic Planning Research Unit  
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## MATTER 10: NATURAL ENVIRONMENT, LANDSCAPE CHARACTER AND GREEN & BLUE INFRASTRUCTURE

### a) Issue 1: Is Policy SP7 justified, effective and consistent with national policy?

1.1 Policy SP 7 is unsound because it is not in conformity with National Policy, specifically paragraph 113 of the Framework. This states:

*“113. Local planning authorities should set criteria based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged. Distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks.”*

1.2 The Plan makes no distinction between the hierarchy of designations whether they be for ecological or landscape purposes.

1.3 The councils site selection process has not taken into account the opportunities to extend the green network as presented by the reasonable alternatives.

1.4 This lack of consideration of reasonable alternatives means the submitted plan is not effective in delivering the objectives of this policy. In particular the ability of the council to select sites which can provide Sustainable Alternative Natural Greenspace has been overlooked. This appears to remain an outstanding issue for the plan and yet there are opportunities for significant provision to be made as outlined in Peer Group's earlier submissions.

1.5 The Regulation 18 and 19 submissions on behalf of Peer Group highlighted that the delivery of the southern part of the NWB Master Plan (EB1003) would result in the provision of some 6 hectares of open space a significant contribution when considered against the 9 hectares that would be allocated for housing. These submissions also highlight the significant extension to the footpath network across Peer Group's wider land ownership providing suitable circular walks for recreational purposes (including dog walking).

1.6 In respect of relieving more sensitive areas from recreational pressure of additional population the earlier Reg 18 submissions “Environmental Issues Ongar Park Estate North Weald Bassett Peer Group plc (Updated January 2018) highlighted the following:

*“LLA agrees with the above statement in the wider context of the whole Ongar Park Estate and **new footpaths have recently been dedicated by the Peer Group for public use and enjoyment.** However, with the exception of a ProW which crosses the site there is presently no public access to the proposed site for development. However, as the estate owner, **Peer Group would make public access, including footpaths, generally available throughout the green areas of the proposed development site.***

*There is an extensive ProW network across the wider surrounding landscape, much of which falls within the ownership of Peer Group. **LLA have prepared a ‘Landscape and Biodiversity Opportunities Plan’ identifying the opportunity and possibility of new access into the open space to enhance connections between the Site and the settlement of North Weald Bassett.** (Refer: Figure 11 Landscape and Biodiversity Opportunities Plan).”*

- 1.7 This Plan was included as appendix (6a) in SPRU's Reg 19 submission as well as accompanying the objector's earlier submissions. For ease of reference this is reproduced on the following page.
- 1.8 In summary the bringing forward of the NWB masterplans southern proposal not only provides for 6 hectares of open space, but importantly substantially extends the public footpath network across the owner's land holdings. This extension of the footpath through the open countryside providing circular routes to and from the settlement is a significant contribution to recreational routes in the area and together with the proposed information boards assist in reducing pressure on more sensitive natural assets.
- 1.9 In light of the evidence regarding housing need, impact on green belt function, general sustainability and now the ability of omission sites to suitably address issues of improved access to greenspace, the plan can not be reasonably judged to be the most appropriate given the evidence base.
- 1.10 In terms of delivering the objectives of SP7 the plan is ineffective and there are more appropriate strategies that could have been adopted. The plan therefore is unsound in terms of paragraph 182 of the 2012 Framework.



1882 Figure 11  
Landscape and Biodiversity Opportunities Plan

1. Ongar Radio Station Local Wildlife Site (LoWS) (ref EP130). Derelict Marconi radio station site comprising old grassland now colonised by secondary woodland and scrub, with remnant areas of acidic grassland, other areas of rabbit grazed grassland and tall sward rough grassland.

2. Weald Common LoWS and Local Nature Reserve (LNR) (ref EP124). Two disjointed meadows created in 1996 as part of a flood defence for the village. Bio-diverse grassland including wet meadows and drains, also open for low key recreational use.

3. Tylers Green Grasslands LoWS (ref EP138). A complex of mainly damp / wet grasslands, grading into other habitat, located close to the eastern end of the proposed development scheme but separated from it by the A414. The adjacent Reynkyns Wood LoWS (EP145) is an area of ancient woodland dominated by hornbeam coppice with occasional oak and field maple standards and a sparse ground cover. Neither the grassland nor the woodland LoWS are likely to be directly or indirectly affected as a result of the scheme proposals. The proposed development area is located far in excess of the minimum 15m buffer zone required by Natural England adjacent to ancient woodland.

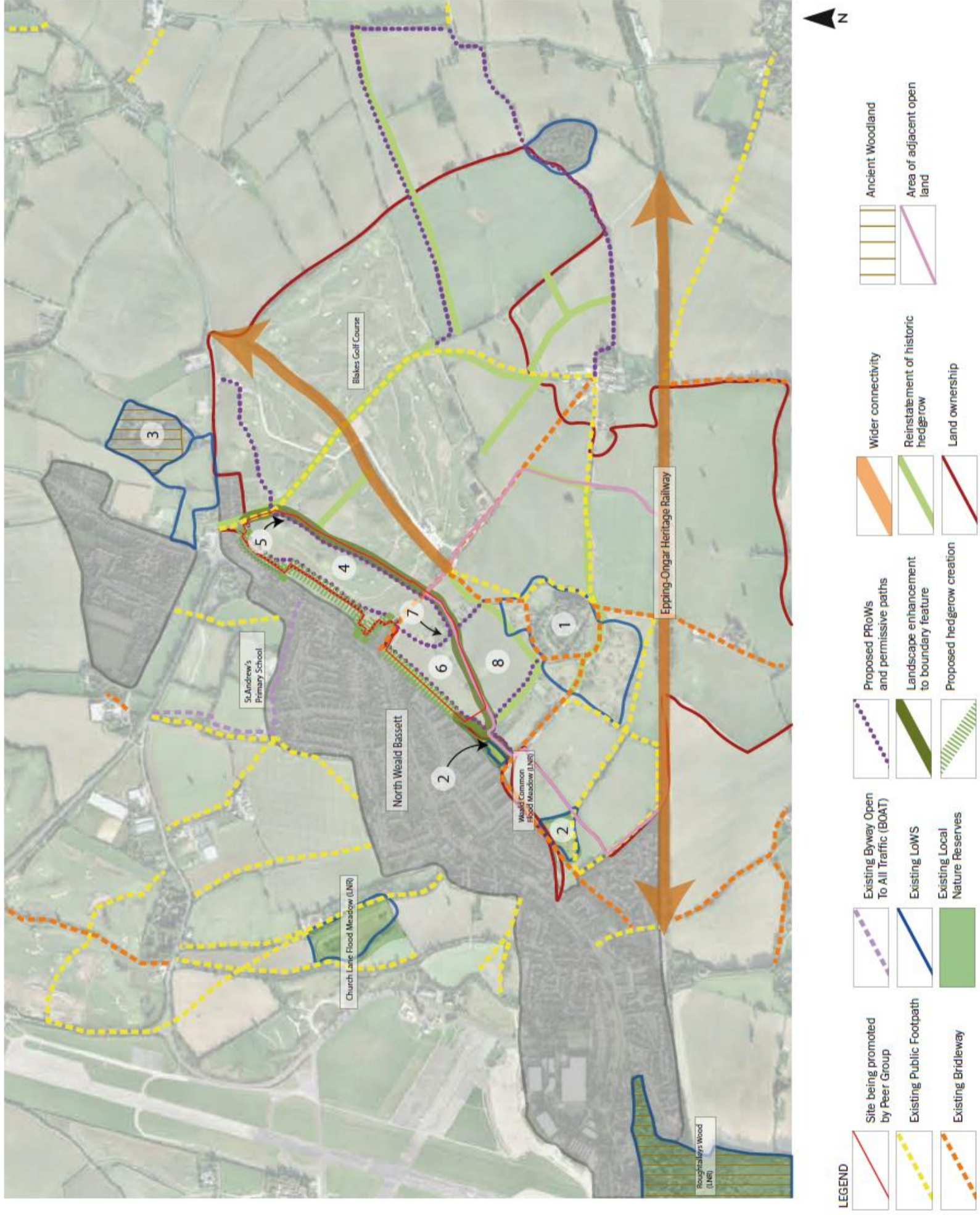
4. Eastern sector of the proposed development site, comprising a peripheral part of Bikes Golf Course. The habitats present are generally immature, highly managed for golf, with a high proportion of short mown grass and generally of minimal nature conservation interest.

5. Pond within the golf course, located at the eastern end of the proposed development site. This wetland habitat has potential to support protected, BAP and other notable species of wildlife including great crested newts, reptiles, foraging bats and badgers and a characteristic range of invertebrates and breeding birds. This wetland and other minor areas of habitat including a small number of remnant, stag headed oak specimens and a peripheral area of rough grassland / scrub in the eastern part of the site, would be subject to specialist ecological survey to inform the development and to determine whether any notable species are present. These localised areas of habitat would be retained within the overall scheme, safeguarded and incorporated into a wider strategic habitat framework for the site.

6. The western sector of the site consists of former agricultural grassland, now unmanaged and the majority of this area consists of rough grass with tall ruderal vegetation and ingress of bramble and other scrub / young trees. Due to the relatively recent abandonment of this land it is unlikely to support protected or other notable species of wildlife, however, this would be confirmed by specialist survey. Whilst the loss of this developing habitat to residential development would result in some adverse ecological impact, this is not expected to be substantial.

7. Part of a belt of semi-mature woodland within the western sector of the site, consisting of young and semi-mature oak dominated woodland with enclaves of rough and rabbit grazed grassland. This is of some local nature conservation interest and may support a range of small mammals, invertebrates and breeding birds, with the possible presence of bats, badgers, dormice and herptiles and would be retained within the development scheme. This developing woodland would form an important part of the strategic habitat framework for the site, along with selected swathes of the scrub and young trees within the wider area, to be safeguarded as effective wildlife corridors in perpetuity.

8. Area of adjacent open land currently comprising extensive areas of unmanaged grassland and invading scrub and young trees in the western part, forming an effective habitat adjacent to the Ongar Radio Station LoWS. The eastern part currently consists of cattle grazed, managed grassland. There is scope to optimise the ecological value of a bio-diverse range of habitats present, through implementing a sympathetic regime of conservation management, to be ratified through planning condition, in compliance with an agreed Landscape and Nature Conservation Management Plan.





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