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THE PROVISION OF SANG FOR NORTH WEALD BASSETT

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EXECUTIVE SUMMARY

This document concerns the relationship between Epping Forest and North Weald Bassett (NWB) and presents information to address Suitable Alternative Green Space (SANG) identified in the emerging Epping Forest Local Plan and the supporting Green Infrastructure Strategy published with the Main Modifications to the Plan.

NWB is on the very periphery of the Zone of Influence for the Epping Forest SAC. The ZOI has two tiers of 3km and 6.2km.

The most recent Epping Forest visitors surveys of 2017 and 2019 indicates that residents of NWB are not substantial recreational users of Epping Forest; the majority of recreational users originate from the south.

NWB is immediately surrounded by an extensive network of circa 80 hectares of woodland and semi-natural open space which benefits from public access.

A landscape strategy being prepared for a Strategic Masterplan (SMP) for NWB is intended to include the incorporation of nearly 15 hectares of open space (30% percent of the SMP area) and an integrated network of landscape green corridors providing 6km of walking routes. This means that every resident living within the SMP area would be capable of living no more than 150m from either an open space or green corridor.

The proposed green corridors link directly into a wider network of 19 km of existing countryside walking routes that surround NWB.

For those residential properties located within the 6.2km recreational ZOI of Epping Forest, there is potential to provide on-site SANG based on 8ha per 1,000 population. This natural and semi-natural greenspace is situated adjacent open countryside and on a wider network of countryside walks that surrounds NWB.

This document sets out the approach that should be taken to the calculation of the area and location for a SANG to show that it is entirely feasible to accommodate it within the SMP area. Residential development at NWB will therefore not have an adverse effect through recreational pressure on the integrity of the Epping Forest SAC / SSSI.

1. INTRODUCTION

- 1.1 This document has been prepared by Paul Gibbs Managing Director of David Jarvis Associates with additional inputs made by Andy Butcher Senior Associate Director of Strutt & Parker and Vivienne Greenough CEcol MCIEEM Associate Ecologist of WYG on behalf of Countryside Properties.
- 1.2 It concerns the relationship between Epping Forest SAC and North Weald Bassett (NWB) and presents proposals for a SANG associated with a recreational strategy to increase the range of recreational opportunities for both existing and future residents in the village. In particular, it seeks to ensure that a full range of recreational opportunities are available locally for North Weald residents in preference to travelling to Epping Forest.
- 4.1 It is based on a document setting out the proposed Recreational Strategy for NWB SMP originally produced in 2020 and issued to EFDC on 19th October 2020 where no comments were received. The document noted that NWB benefits from more than ten times the required provision of natural and semi natural greenspace. This would be further enhanced by the SMP. This has now been updated to take into account the 2019 visitor survey and responds to the agreed EFDC Green Infrastructure Strategy¹.

The location and extent of Epping Forest

- 1.3 Epping Forest is a 2,400-hectare area of ancient woodland between Epping in Essex to the north, and Forest Gate in Greater London to the south, straddling the border between London and Essex. It is a former royal forest and is managed by the City of London Corporation. An area of 1,728 hectares (4,270 acres) within the Forest is a Site of Special Scientific Interest (SSSI) and a Special Area of Conservation (SAC).
- 1.4 The forest is approximately 19 km (12 mi) long in the north-south direction, but no more than 4 km (2.5 mi) from east to west at its widest point, and in most places considerably narrower. It lies on a ridge between the valleys of the rivers Lea and Roding. It contains areas of woodland, grassland, heath, rivers, bogs and ponds, and its elevation and thin gravelly soil (the result of glaciation) historically made it unsuitable for agriculture.

The 1878 Epping Forest Act

1.5 The Epping Forest Act 1878 was passed, saving the forest from enclosure, and halting the shrinkage of the forest that this had caused. Epping Forest ceased to be a royal forest and was placed in the care of the City of London Corporation who act as Conservators. In addition, the Crown's right to venison was terminated, and pollarding was no longer allowed, although grazing rights continued. The act laid down a stipulation that the Conservators "shall at all times keep Epping Forest unenclosed and unbuilt on as an open space for the recreation and enjoyment of the people". The Act therefore requires the Forest to be made available for the recreational enjoyment of the public.

SAC and SSSI overview

Epping Forest SAC / SSSI

1.6 Parts of Epping Forest are designated as SAC and SSSI and therefore protected by law. Approximately 70% of the 1,600 hectare SAC and SSSI site consists of broadleaved deciduous woodland, and it is one of only a few remaining large-scale examples of ancient wood pasture in lowland Britain. Epping

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¹ "Green infrastructure Strategy" April 2021

- Forest SAC supports a nationally outstanding assemblage of invertebrates, a major amphibian interest and an exceptional breeding bird community.
- 1.7 Epping Forest qualifies as a SAC for both habitats and species. Firstly, the site contains the Habitats Directive Annex I habitats of Beech forests on acid soils with Ilex and sometime Taxus in the shrub layer, wet heathland with cross-leaved heath; and dry heath.
- 1.8 Secondly, the site contains the Habitats Directive Annex II species Stag beetle *Lucanus cervus*, with widespread and frequent records.
- 1.9 Current Pressures and Threats to the SAC (taken from the Site Improvement Plan, Natural England 2016) include air pollution, under grazing, public access/disturbance, changes in species distribution, inappropriate water levels, water pollution, invasive species and disease.
- 1.10 The SAC and SSSI designations create a conflict with the legal duty imposed by the Epping Forest Act. Parts of Epping Forest are in poor conservation status including from recreational pressure from nearby residents using the Forest. However, this needs to be considered against the Epping Forest Act requiring the Forest to be available for the recreation and enjoyment of the people.
- 1.11 New development is required only to mitigate any effects that may arise as a consequence, not to resolve any shortfall in the conservation status of all, or part, of the Forest.

Recreational activities promoted in Epping Forest

1.12 Reflecting the duty that Epping Forest be maintained for the recreation and enjoyment of the people walking, cycling, mountain biking and horse riding are currently actively promoted in the Forest. In addition, the Forest operates four visitor centres, a public golf course at Chingford, sixty football pitches, a wedding venue and more than 30 car parks.

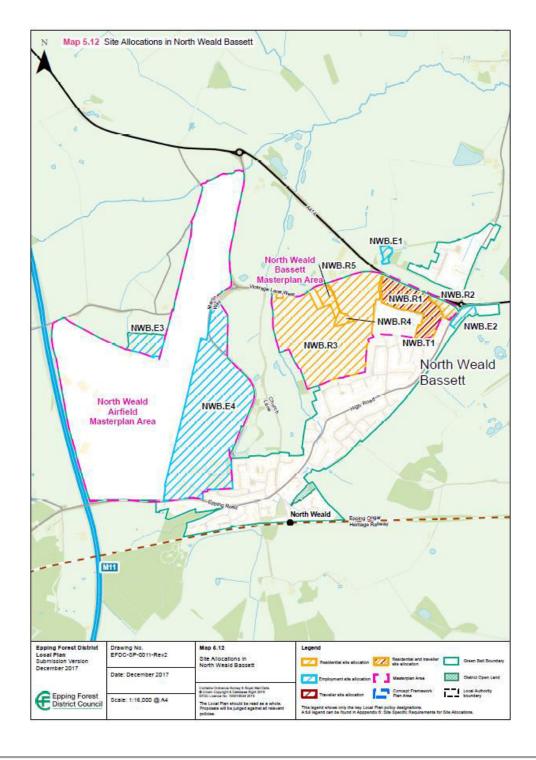
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2. PLANNING POLICY CONTEXT

Submission Epping Forest District Local Plan (2017)

- 2.1 The Epping Forest Local Plan was subject to Examination between February and June 2019. The policies of the Local Plan relevant to the consideration of this Strategy are discussed below.
- 2.2 Policy P6 proposes two masterplans for NWB. One relating to a strategic housing allocation to the north of the village and a second relating to employment, a leisure centre and other community uses at the airfield. The NWB Masterplan for the housing allocation is to provide for 1,050 homes and for the improvement and provision of open space in the village.



- 2.3 Policy DM2 relating to the Epping Forest SAC requires that development proposals assist in the conservation and enhancement of the biodiversity, character, appearance and landscape setting of the SAC. Development likely to have a significant effect either alone or in combination with other development will be required to demonstrate that adequate measures are put in place to avoid or mitigate any potential adverse effects. In strategic developments, the Council are seeking the provision of meaningful, natural green space or access to natural green space that can involve:
 - providing new green space;
 - improving access to green space;
 - improving the naturalness of green space;
 - or improving connectivity between green spaces.
- 2.4 Policy DM22 relating to Air Quality set out requirements for the protection from the impacts of air pollution and mitigation measures to environmental receptors including the Epping Forest SAC.
- 2.5 During the course of the Local Plan Examination, the Council provided proposed amendments to Policies DM2 and Policy DM22 to address the potential impact of increased recreational pressure and air pollution on the Epping Forest SAC. These are now expressed in proposed Main Modifications to the Local Plan (MM46, MM47, MM74 and 75) published for consultation in July 2021.
- 2.6 Particularly relevant to this report, the amendments to DM2 provide for an expectation that relevant development proposals ensure that there is no adverse effect on the site integrity of the Epping Forest SAC. For recreation impacts, the mitigation strategy is expected to be two inter-related parts. First, site access management and monitoring within the SAC. Second, those proposals in the zone of influence are expected to make a contribution to management and provision of Suitable Alternative Natural Greenspace (SANGs), which provides for alternative sites for recreation. This is noted to involve:
 - providing new natural green spaces;
 - improving access to natural green spaces;
 - improving the recreation facilities, naturalness, and habitat quality of existing green spaces;
 - Improving connectivity between green spaces where this would not contribute to a material increase in recreational pressure on designated sites.
- 2.7 Policy DM5 relating to green and blue infrastructure requires development proposals to be designed to:
 - Retain and where possible enhance existing green infrastructure
 - Use native species in new planting
 - Incorporate appropriate provision of new green assets or space
 - Enhance connectivity by providing pedestrian / cycle access to existing and proposed green infrastructure networks except where this would create additional recreational pressures on the Epping Forest SAC (MM 51)
 - Enhance public realm through provision of planting and open spaces
- 2.8 Policy DM6 requires development proposals where appropriate to be required to provide open space, or links to open space (with the exception of to the Epping Forest SAC) in accordance with the guidance contained within the Infrastructure Delivery Plans Schedules and the Council's adopted Green Infrastructure Open Space Strategy (MM 53).

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Green Infrastructure Strategy

- 2.9 To support the Local Plan, EFDC published a Green Infrastructure Strategy (GIS) document that was subject to consultation between June and July 2020, and approved by Cabinet in April 2021.
- 2.10 This sets out a vision and objectives for Green Infrastructure in the District. In summary and relevant to this Strategy, the vision requires existing and new communities to have access to high quality, well maintained multi-functional spaces, protection and enhancement of important ecological, natural heritage and landscape assets and for new places to achieve the provision of design-led green and blue infrastructure.
- 2.11 Section 3 relating to the Strategic Allocations of the Local Plan sets out a commentary on the context for NWB with the summary setting out the objectives for Green Infrastructure.

Delivering SANG

- 2.12 Part 3 of the Strategy sets out guidance on the strategic allocations, including NWB. The Summary at page 125 sets out an indicative SANG size of 20ha for NWB with a preferred location shown between the commercial and residential masterplans.
- 2.13 Supporting the requirement for the provision of SANG, Section 3 states that:

The provision of SANG should complement the existing network of Natural Greenspace offer in North Weald Bassett. The preferred location for the SANG is between the emerging Local Plan's commercial and residential Masterplan Areas, as this area would best enable the creation of distinctive and valuable habitats, maximise access to the PRoW network as well as the opportunity to allow people to connect with these assets. This would provide a positive alternative offer to the Epping Forest SAC.

The Council, in its landowner role, has indicated that it is proposing to provide an element of SANG to complement development within the North Weald Airfield Masterplan. In order to maximise this opportunity, the Council and the site promoters of the residential led Masterplan should work together to better understand how this land could support the delivery of an enhanced SANG offer in North Weald Bassett. The Masterplan Area provides for some 1050 new homes. Based on the total number of homes proposed within the Masterplan area this equates to c.20 ha of SANG. It is recognised that a large part of the site lies beyond the current 6.2km Zone of Influence. As with the Latton Priory and Water Lane Masterplan Areas, there is a need to 'future-proof' the development recognising that the Zone of Influence could extend further, and that the development of the North Weald Bassett Masterplan Area should not contribute to that expansion. Therefore, there will be a need to ensure that sufficient SANG provision is provided. There are also opportunities within close proximity to the Masterplan site that could, with appropriate enhancements and financial contributions towards long-term maintenance costs, be used by dog- owners in particular. In the event that the quantum of SANG to be provided cannot adequately accommodate such activities without creating conflict with other users of the SANG, it may be possible to adopt a flexible approach if this can be fully justified in terms of protecting the Epping Forest SAC and be deliverable.

Suitable Accessible Natural Greenspaces (SANGs)

- 2.14 Having regard to Part 3 of the Green Infrastructure Strategy it is important to note that the provision and content of SANGs will vary on a case-by-case basis. Their focus is dictated by a Habitats Regulations Assessment (HRA) and may be grouped or individually. Local evidence on the use of the nearby European site(s) indicates particular local requirements for SANGs to serve as a viable alternative to the European sites.
- 2.15 Whilst not a formal standard for SANG in this locality, the Thames Basin Heath HRA is referenced in the EFDC GI Strategy.
- 2.16 It is important to note that the key principles, including SANG size, are established practice only and do not constitute a formal standard.

North Weald Bassett Neighbourhood Plan (NWBNP)

- 2.17 The NWBNP is in preparation following a successful questionnaire exercise in the village in 2018 and local consultation on the vision, objectives and draft policies for the NWBNP following that feedback in December 2019. Related to SANG provision and a proposed recreational strategy there are proposals in the NWBNP to:
 - Designate Memorial Playing Fields as a Local Green Space
 - Create a Rail Trail between North Weald Station and Epping Station and proposals to enhance the Epping Ongar Railway as a tourist destination

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- Provide pedestrian and cycle links between the Airfield and the NWB Masterplan area; use of the airfield for recreational aviation, heritage and related events. Provide green buffers between existing and proposed residential areas to accommodate cycling, and pedestrian paths and creation of accessible green open spaces
- Retention and enhancement of the landscape and biodiversity

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3. NWB AND EPPING FOREST

Relative location of NWB to Epping Forest

3.1 The northern tip of Epping Forest SAC is 4.7km from the south western edge of North Weald Bassett, separated by the M11, M25 and the town of Epping. The nearest part of the NWB Residential Masterplan Area lies 5.9km from the SAC. Refer to WYG Figures at Appendix 1.

2017 Epping Forest visitor survey results

- 3.2 In 2017, Footprint Ecology were commissioned by EFDC to undertake a survey of visitors to Epping Forest. The results of this survey were published in August 2018².
- 3.3 Key observations arising from the Epping Forest Visitor Survey 2017 relevant to this report are summarised as follows:
 - a) 1,065 groups of people were counted entering at the surveyed locations, and the survey point with the most people entering or passing was, by some considerable margin,
 Connaught Water [Connaught Water is 12km to the south west of NWB, north of Chingford. Epping Forest lies between NWB and Connaught Water].
 - b) 462 interviews were conducted, with Connaught Water, Chingford Plain and Pillow Mounds car-parks the locations with the most interviews conducted.
 - c) Virtually all (99% of interviewees) had come for a short visit directly from home (i.e. as opposed to being on holiday or staying away from home in the area).
 - d) Dog walking was the commonest activity (49% of interviewees), with other activities including walking (22%), outing with the family (9%), cycling/mountain biking (8%) and jogging/running/power walking (5%).
 - e) Dog walking was the most frequent activity among interviewees at all but two survey points and dog walkers accounted for over 80% of interviewees at Lakeside and St. Peters.
 [Lakeside is in Leyton and St Peters in Walthamstow; both are approximately 29km from NWB]
 - f) A high proportion of all interviewees were frequent visitors to Epping Forest, with 24% visiting daily and 32% visiting 1-3 times per week.
 - g) The majority (86%) of interviewees visited equally all year round and did not tend to visit more at a particular time of year.
 - h) More than three-quarters (77%) of those interviewed had arrived by car. A further 14% had arrived on foot and 5% by bicycle. Car was the main mode of transport at all survey locations apart from St. Peters.
 - i) Interviewees' home postcodes were largely in a broad wedge to the north-east of London, between the A12 and the A10.
- 3.4 Of the 462 interviews undertaken only two respondents were from North Weald Bassett. Both respondents were interviewed at the Long Running car park, the most northerly car park in the Forest, a drive of 10 km from NWB. One was a family outing and the other was dog walking. Both were frequent visitors, going to the Forest more than once a week. North Weald Bassett is located in a 2km by 2km grid, resulting in average visitor density of 0.5 visitors per sq. km (i.e. 2 visitors / 4 sq km).

² Footprint Ecology "Epping Forest Visitor Survey 2017" 2018

- 3.5 This would seem to indicate that the vast majority of residents of North Weald Basset go elsewhere for their recreational needs compared to other settlements close to the Forest.
- 3.6 More generally, the key recreational impacts identified by the 2017 survey are from dog walking, walking and family outings. These activities are currently popular in and around NWB.

2019 Epping Forest visitor survey results

- 3.7 In 2019, Footprint Ecology were commissioned by EFDC to undertake a further survey of visitors to Epping Forest as an update the 2017 visitor survey. The results of this survey were published in February 2021³. Key observations arising from the Epping Forest Visitor Survey 2019 relevant to this report are summarised as follows:
 - a) Visitor numbers entering the Forest are up from 1,065 groups 2,207 people in 2017, to 1,387 groups 2,763 people in 2019. Additional numbers were recorded for those passing through
 - b) 462 interviews were conducted in 2017, and 662 interviews were conducted in 2019
 - c) In 2017 dog walking was the commonest activity (49% of interviewees), with other activities including walking (22%), outings with the family (9%), cycling/mountain biking (8%) and jogging/running/power walking (5%).
 - d) In 2019 either dog walking (40%) or walking (30%) were the commonest activities. Other activities included cycling (8%), running (5%), outings with the family (3%) and enjoying the scenery (3%).
 - e) The busiest areas remain those in the south of the Forest
 - f) In 2017 99% of interviewees were on a short visit directly from home. In 2019 this figure had reduced slightly to 97%
 - g) In 2017 nearly half (45%) of all interviewees came from Epping Forest District, with nearly a third (31%) from the London Borough of Waltham Forest, and 11% from Redbridge.
 - h) In 2019 over a third (35%) of all interviewees were residents of Waltham Forest, with a further 31% residents of Epping District, a reduction of 14% on 2017. 12% of interviewees came from Redbridge. No other local authority contributed more than 5% of the interviewees.
 - i) The number of visitors interviewed from NWB increased from 2 in 2017 to 3 in 2019. One was a daily visitor, one visits most days and the other visits monthly
 - j) The 2019 survey not only involved more interviews, but also included a lower proportion of dog walkers, with a smaller proportion seen off lead. Comparing the distances from home postcode to survey point, the median in 2019 was slightly lower (2.93km compared to 3.08km) yet the 75th percentile was slightly higher (7.02km compared to 6.16km).
 - k) There is a high proportion of use from close to the SAC and the majority of visitors from around 7km.

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³ Footprint Ecology "Epping Forest Visitor Survey 2019" 2021

Zone of Influence

3.8 Natural England's advice note to all LPAs, dated 6th March 2019, states:

"As part of the work required to produce the Mitigation Strategy, Footprint Ecology undertook a visitor survey to identify a recreational zone of influence and to identify the distance the majority of visitors will travel to visit Epping Forest SAC. This report identified that 75% of visitors travelled up to 6.2Km to the SAC.

Natural England therefore advises that in this interim period (that is until further evidence collected during Summer 2019 can be examined and taken into account. Aiming for January 2020), a zone of influence of 6.2Km is used to determine whether residential applications will have a recreational impact on Epping Forest SAC."

- 3.9 Paragraph 5.17 of the EFDC HRA⁴ reads "However, within that 6.2km zone visitors are not evenly spread; the vast majority of Essex-resident visitors live within 3km of the SAC with few living further afield. For example, only 3 visitor postcodes recorded in the visitor survey were between 3km and 6.2km of the SAC in Epping Forest District; almost all visitors resident in Epping Forest District (irrespective of visit frequency or activity) lived within 3km of the SAC. The 6.2km distance appears to be influenced particularly by residents to the south of the SAC in north London who are dispersed over a wider area. Nonetheless, Epping Forest District Council is using 6.2km as a definition of the core catchment [Zone of Influence (ZOI)] of Epping Forest SAC for purposes of determining mitigation."
- 3.10 On 10th August 2021 Natural England⁵ advised that:
- 3.11 "Given the current absence of an agreed interim strategy for GI/SANGs all developments must be dealt with on a case by case basis. All residential planning applications which are within 6.2Km of Epping Forest SAC need to be subject to a project level HRA to address recreational impacts both alone and in combination. Developments within the ZoI should seek to deliver/contribute to SANGS and/or provide sufficient GI to meet the daily needs of new residents."
- 3.12 The Masterplan Area is nearly 6km from the SAC as shown at Appendix 1. Consequently only 23% of the Masterplan Area falls within the Zone, namely the south western corner. The majority of the residential areas within the NWB SMP area are located beyond the 6.2km Zone of Influence in relation to recreational pressure on Epping Forest.
- 3.13 North Weald Bassett had a population of 4,477 in the 2011 Census⁶.
- 3.14 The Draft EFDC Local Plan 2017 allocates five sites for residential development of up to 1,050 dwellings at NWB. Based on an average occupancy of 2.34 persons / dwelling⁷ the allocation would increase the population of the village by 2,457. Within the Local Plan, only site NWB.R3 allocated for 728 dwellings straddles the 6.2km Epping Forest SAC zone of influence in regard to potential recreational activity.
- 3.15 This would bring the potential population of the village to 6,934 residents.

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⁴ AECOM "Habitats Regulations Assessment Screening of Epping Forest District Council Regulation 19 Local Plan" January 2019

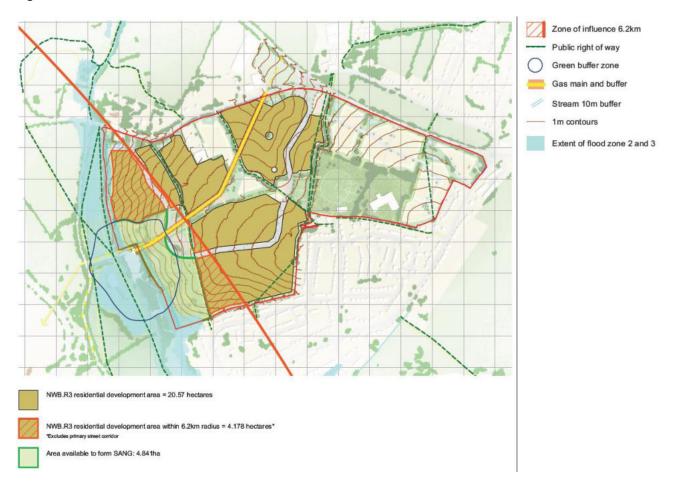
⁵ Natural England "Overarching Standard Advice for Development Applications within Epping Forest District Provided on the 10th of August 2021"

⁶ https://www.nomisweb.co.uk/reports/localarea?compare=E34002456

⁷ ONS population estimates and DCLG household projections See EFDC Submission Local Plan December 2017 page 5

3.16 The draft SMP indicates a maximum of 4.178 hectares of residential development land on the edge of the Zone of Influence. The proposed density framework plan indicates that the residential density of this residential development land would be an average of 36 dwellings per hectare. The distribution of residential development has been determined by the presence of the odour contour around the WWTW on Church Lane, the public footpath, the gradient of the land and the need to provide SuDS features in that part of the site. The open space area that results is entirely suited to use as SANG. See Figure 1 below.

Figure 1 – Zone of Influence



- 3.17 Using the assumed standard of 8 hectares of SANG per 1,000 population, the quantum of SANG required at NWB is calculated as follows:
 - a) 4.178 ha of residential land x 36 dwellings per hectare = 150.408 dwellings within the Zone of Influence
 - b) 150.408 dwellings x 2.34 average person per dwellings = 351.95 population within the Zone of Influence
 - c) 351.95 population / 1,000 persons = 0.3520
 - d) 0.3520 * 8 hectares = 2.816ha SANG requirement to mitigate for residential development within the Zone of Influence

- 3.18 An area of 4.841ha exists in the south west corner of the Masterplan Area which could accommodate SANG.
- In accordance with Natural England standing advice of 22nd August 2021 there is no specific 3.19 requirement to provide mitigation for new residential development proposed outside the Zone of Influence.
- 3.20 For NWB, the objectives of 3.2 of the GIS can be satisfied through the provision of combined benefits arising from existing and proposed facilities, routes and attractions that are to be taken forward as part of the SMP would include:
 - Rural areas to provide a similar experience to recreation being undertaken on European sites
 - Areas away from visual and audible detractors such as busy roads, urbanised landscapes, industrial and manmade features
 - Large areas of naturalistic and biodiversity rich open space including a substantial open green flank along the western portion of the Area which will be part of the development. It is strategically located next to an area of open countryside already used by NWB residents as part of wider access to recreational resources.
 - A significant network of circular walks that far exceeds 2.5km in length
- 3.21 A substantial open green flank is proposed as part of the development. It is strategically located next to an area of open countryside already used by NWB residents as part of wider access to recreational resources.

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4. CONCLUSIONS

- 4.1 North Weald Bassett is distant from Epping Forest SAC / SSSI. The Masterplan Area is nearly 6km from the Epping Forest SAC / SSSI. Consequently only 23% of the Masterplan Area falls within the Zone of Influence, namely the south western corner.
- 4.2 Of the 662 interviews undertaken in the Epping Forest questionnaire carried out in 2019 only three respondents were from North Weald Bassett. The vast majority of residents of North Weald Basset go elsewhere for their recreational needs compared to other settlements close to the Forest.
- 4.3 North Weald Bassett as a village has an abundant network of greenspaces and recreational walking routes. This includes an extensive 19km network of Public Rights of Way that form well-used links to the wider rural countryside.
- 4.4 NWB benefits from more than ten times the required provision of natural and semi natural greenspace. This would be further enhanced by the SMP.
- 4.5 In accordance with Natural England standing advice of 22nd August 2021 there is no specific requirement to provide mitigation for new residential development proposed outside the Zone of Influence.
- 4.6 Therefore, based on the number of proposed dwellings that fall within the Zone of Influence, the objectives of 3.2 of the GIS can be satisfied through the provision of 2.816ha of SANG. An area of 4.841ha exists in the south west corner of the Masterplan Area which could accommodate SANG.
- 4.7 A substantial open green flank is proposed as part of our development. It is strategically located within the SMP area next to an area of open countryside already used by NWB residents as part of wider access to recreational resources.

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4.8 The intention is to take the SMP forward based on the contents of this document.

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APPENDIX 1

WYG figures

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