

Date: 08 April 2025

Uttlesford District Council
Harlow District Council
East Hertfordshire District Council
Epping Forest District Council
cc The National Trust



BY EMAIL ONLY

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Dear Sir/Madam

Hatfield Forest Mitigation Strategy – Project update

Uttlesford District Council (UDC), East Herts District Council (EHDC), Harlow District Council (HDC) and Epping Forest District Council (EFDC), the National Trust (NT) as landowners of Hatfield Forest Site of Special Scientific Interest (SSSI) and National Nature Reserve (NNR) and Natural England (NE) have been working in partnership to agree a strategic mitigation solution for the adverse impacts of recreational pressure on Hatfield Forest SSSI / NNR.

At the most recent partnership meeting (26 March 2025), it was agreed that Natural England would issue an updated note to all relevant parties, as the partnership had reached agreement on several documents relating to the mitigation strategy. The purpose of this note is to outline the recent updates to the strategy and the next steps.

This advice should be used to inform all development management decisions for new residential dwellings within the Hatfield Forest Zone of Influence. See Appendix A for further details on the types of development and T&CPA use classes that apply.

This letter should be circulated to all Development Management Officers within the four LPAs, to help inform their development casework, and be used in conjunction with the Impact Risk Zone for Hatfield Forest on [Magic Maps](#). The validation lists for each LPA should be updated to include reference to 11.1km ZOI around Hatfield Forest.

This letter follows on from and supersedes, previous correspondence with the local authorities (letters dated 5 April and 25 September 2019, and 28 June 2021). The 2021 letter has been included as an attachment to this letter and should be read in conjunction with this update.

Review of the Mitigation Strategy

In 2023, Natural England took the decision to review the Strategic Access Management and Monitoring (SAMM) measures based on findings from a *Lepus* report comparing Strategic Solutions across the country ([Compilation and Review of Evidence Leading to SANG and SAMM Provision](#), published in March 2024). The aim was to ensure that the strategy was robust and consistent with other projects, and to feed in our experience on developing similar strategies for the Chiltern Beechwoods Special Area of Conservation (SAC), Epping Forest SAC and the Essex Coast. The main changes are summarised below:

- 1) **The costings for the on-site mitigation measures (Strategic Access Management and Monitoring (SAMM) measures) have been changed to be in-perpetuity (80 years minimum).** The residual impact will remain for the long-term and this provides sufficient certainty that the

mitigation will be secured for the future.

- 2) Natural England and National Trust worked closely **to refine the on-site mitigation measures** – to ensure a realistic, workable tariff that is broadly consistent with other similar projects.
- 3) The ZOI was updated to reflect a consistent evidence base. **The updated ZOI is now 11.1km based on the 2022 visitor data.** Natural England has updated the Impact Risk Zone on [MAGIC Maps](#) for Hatfield Forest SSSI/NNR, to reflect this change. This revised ZOI of 11.1km supersedes the previous ZOI referenced in our letter dated 28 June 2021.
- 4) Superseding previous NE advice in our letter dated 28 June 2021, **ALL new dwellings within Uttlesford District and East Hertfordshire District (excluding the Gilston Area allocation GA1) are required to pay the SAMM measures tariff. ALL new dwellings within the East of Harlow Masterplan site (Epping Forest District and Harlow District) will be required to pay the SAMM measures tariff. Proposals for 50+ dwellings will normally be required to pay the SAMM measures tariff AND provide substantial on-site greenspace provision.** Consideration will be given to this on-site provision on a case-by-case basis depending on the size and location of housing developments in relation to Hatfield Forest SSSI/NNR, Suitable Alternative Natural Greenspace (SANG) will be required (see Appendix B for a note on NE requirements). Applicants are advised to consult early with NE to determine the greenspace requirements for their proposal. NE will also advise LPAs as part of Local Plan preparation in relation to strategic housing allocations.

Natural England discussed these changes with the representatives of each of the Local Authorities and no specific concerns were raised.

LPA officers' recommendations to their respective LPA Cabinet Members

Officers representing the four LPAs are now able to recommend to LPA Cabinet Members the following, which have received input from the National Trust and Natural England.

- 1) **The final version of the National Trust SAMM measures** (version 6, included as an attachment to this letter). The total cost of the package is valued at £7,403,760 over 80 years.
- 2) **The apportionment of the SAMM measures between the four LPAs via a hybrid method.** This method takes equal account of both the percentage visitor impact and the proportion of new housing relative to existing within the ZOI.
- 3) **The apportioned SAMM tariff for each LPA:**
 - i. Uttlesford District Council: £1,329.36/new dwelling
 - ii. East Herts District Council: £538.35/new dwelling
 - iii. Harlow Council & Epping Forest District Council (East of Harlow Masterplan Area only): £153.15/new dwelling
- 4) **The SAMM tariff is applicable with immediate effect, as is the requirement for substantial on-site greenspace**, as per Appendix B.

Requirement for provision of substantial natural greenspace for larger developments

Natural England engaged with Uttlesford District Council regarding the need for larger site allocations within the ZOI to provide Suitable Alternative Natural Greenspace (SANG), as part of the work to inform their new Local Plan.

The [Open Space Update Report](#) (Knight, Kavanagh & Page, June 2024) notes that Hatfield Forest SSSI/NNR accounts of 75% of the total natural and semi-natural greenspace provision within UDC. As such, our advice was that large site allocations within the ZOI are required to provide SANG to address this deficit in accessible open space. The [SANG and Country Park Study](#) (LUC, June 2024), submitted as part of the evidence base for the UDC Local Plan Submission Version, demonstrates that the four

large UDC housing allocations within the ZOI will provide sufficient semi-natural open space to meet NE SANG criteria, subject to detailed design.

Natural England will engage with East Herts District Council in due course regarding the need for SANG on larger housing allocations within the ZOI, as the LPA progresses the updating of its Local Plan.

Both Harlow District Council and Epping Forest District Council have adopted Local Plans which have, except for the East of Harlow Garden Community site, only a small level of housing proposed within the ZOI and on the periphery of it. As such NE does not anticipate the need for engagement on SANG provision with these two LPAs until such time as they progress an update of their adopted Local Plans.

Natural England notes that Policy SP4 of the adopted Epping Forest District Local Plan 2011-2033 requires the provision of strategic green and blue infrastructure on the East of Harlow site, comprising in particular natural/semi natural open space and that Policy HS3 of the adopted Harlow Local Development Plan requires the East of Harlow site to include the provision of Green Wedges and Green Fingers, incorporating public natural/semi-natural open space within the development to link with the existing network of Green Wedges and Green Fingers in the district.

Large windfall sites within the ZOI will be dealt with on a case-by-case basis. As mentioned above, Appendix B sets out Natural England's approach to the requirement for accessible green space to mitigate the recreational pressure of larger housing allocations (50+ dwellings) on Hatfield Forest SSSI/NNR.

Next steps

Officers from each of the four LPAs will draft a committee report for their respective LPA Cabinet Members, to seek approval of the SAMM measures, cost and apportionment. Approval will also be sought for a draft Governance Agreement between the four LPAs and the National Trust as landowners, with delegated authority to work on a final version of the Governance Agreement with LPA lawyers. It is expected that the Governance Agreement, with the SAMM measures, cost and apportionment, and other supporting schedules, will be signed and sealed in autumn 2025.

We recognise that further work is needed over the coming months to legally secure this strategy, and, in due course, further work will be needed on SANG for larger developments as the LPAs review their Local Plans. Natural England will continue to support the strategic mitigation solution for Hatfield Forest SSSI/NNR via the regular partnership meetings and ad hoc advice as required, and we look forward to continuing our relationship with all four LPAs and the National Trust for the benefit of Hatfield Forest SSSI/NNR.

Should you wish to discuss any of the above in more detail please do not hesitate to contact Fiona Martin via fiona.martin@naturalengland.org.uk.

Yours sincerely

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West Anglia Area Team
Natural England

Attachments to this letter:

- NE Letter to LPAs (Hatfield Forest Mitigation Strategy) 28 June 2021
- National Trust Hatfield Forest SAMM measures v6 (February 2025)

Appendix A

SAMM tariff - types of development

The SAMM tariff applies to all new residential development where there is a net increase in dwelling numbers. It excludes replacement dwellings where there is no net gain in dwelling numbers.

The full per dwelling tariff applies to all C3 dwellings and sites for gypsy, traveller and travelling show people (one pitch = one C3 dwelling).

For C1 (hotels), C2 (residential institutions) and C4 (houses in multiple occupation), depending on the circumstances of the planning application, such applications may not be liable to pay the SAMM tariff. Alternatively, a reduced tariff compared to the equivalent C3 tariff/dwelling may be required. Natural England can advise on the SAMM tariff requirement on a case-by-case basis via our [Discretionary Advice Service](#).

Sui Generis developments will similarly be considered on a case-by-case basis according to the type of development proposed.

SAMM tariff - types of planning application

Natural England are of the opinion that Reserved Matters applications within the ZOI will have to demonstrate no negative impacts on Hatfield Forest SSSI/NNR, in accordance with the WACA 1981 and NPPF. This will require mitigation if none has been secured at Outline stage. Similarly, Section 73 applications are new planning applications under the 2017 Environmental Impact Assessment (EIA) Regulations and will also be required to adhere to the Hatfield Forest mitigation strategy.

As such, the SAMM tariff applies to all Full applications, Outline applications, Hybrid applications, Reserved Matters applications (if not considered previously) and Section 73 applications.

Appendix B

Accessible Greenspace requirements for developments of 50+ dwellings

For developments of 50+ dwellings, Natural England advice is that recreational pressure on Hatfield Forest should be mitigated via payment of the SAMM tariff and provision of substantial on-site greenspace. Ideally, this open space would meet Natural England Suitable Alternative Natural Greenspace (SANG) standards, in order to ensure that on-site greenspace provision is designed to include high quality, semi-natural areas, with sufficient visual screening from new development and of a sufficient size and quality that it is attractive to a range of visitors. You should refer to the Thames Basin Heath [SANG guidelines](#) for further background information, as well as the key criteria listed below.

As a minimum, we advise that the substantial on-site greenspace provision must include:

- High-quality, informal, semi-natural areas;
- Circular dog walking routes of 2.3 km within the site and/or linking to surrounding Public Rights of Way (PRoW) and highways;
- 'Dogs-off-lead' areas;
- Signage on-site and information leaflets to first occupiers to promote these areas for recreation;
- Dog waste bins; and,
- The long-term maintenance and management of these provisions secured in-perpetuity.

To meet the NE SANG Guidelines, open space should be provided at 8ha per 1000 new population; this could potentially be reduced with agreement from Natural England in exceptional circumstances and with appropriate justification.

Larger sites and/or those in close proximity to Hatfield Forest SSSI/NNR are likely to need to provide a full SANG, i.e. a greenspace of 9-10ha minimum that includes a 2.3-2.5km circular walk within the boundaries of the SANG, rather than a smaller on-site greenspace and a circular walk that makes use of existing PRoW and highways.

Natural England should be consulted on all proposals which includes provision of site-specific on-site greenspace and/or where other bespoke mitigation for recreational impacts is included as part of the proposal (e.g. an off-site Country Park). We would also strongly recommend that applicants seek pre application advice from Natural England through its [Discretionary Advice Service](#) if they are proposing site-specific green infrastructure (i.e. SANG or substantial on-site greenspace).