



10,000 Trees not 10,000 Houses

EASTON PARK

A WORTHY LEGACY

**COUNTRY PARK
VISITOR ATTRACTION
BIODIVERSITY RING
NATURE RECOVERY NETWORK
ENVIRONMENTAL FLAGSHIP**

**FOR UTTLESFORD DISTRICT
Its People, Environment, Heritage and
Future Generations**

**BRIEFING PAPER FOR UDC COUNCILLORS
PROTECTION, RESTORATION, ENVIRONMENTAL FLAGSHIP**

November 2021

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INTRODUCTION

Stop Easton Park (SEP) was set up in April 2017 following the issue of the last draft Local Plan. From the start, our mission has been **the need to preserve suitable open space for the physical and mental wellbeing of future generations**, just as the great parks of London were reserved 500 years ago. The need for such facilities has become increasingly apparent since then, both for people and the environment.

We understand the need for new housing as too the requirements of central government. But **reserving suitable open space should be a prerequisite to the selection of sites for house building**. It is regrettable that this has not been acknowledged in the Preliminary Outline Strategy (POST) approved by Cabinet on 2 September 2021.

Our campaign for Easton Park has fallen into three stages: _

- **Protection:** throughout the process for the last draft Local Plan up to its withdrawal in April 2020.
- **Restoration:** following withdrawal, leading to the issue of our Vision Document of July 2020.
- **Environmental flagship:** the third stage of our campaign, to see Easton Park as part of a larger environmental initiative to surround the restored park with a biodiversity ring that in turn would be part of a Nature Recovery Network to reflect the Great Forest of Essex that spread from Epping to Thaxted.

Easton Park is unique amongst the 299 sites put forward under the Call for Sites by virtue of:

- i) its ability to provide the open space and facilities so badly needed in the Uttlesford District, notably in the south;
- ii) Its ability to provide a real haven for nature and the environment;
- iii) Its scale;
- iv) its 700 year history as a medieval deer park, one of the largest in Essex;
- v) the wide and abundant range of wildlife that remains;
- vi) its heritage; and
- vii) the 1939 Agreement which gives UDC both **the responsibility and the right to preserve the park from development**.

Easton Park provides the opportunity for a revolutionary development for the benefit of local residents, the environment, UDC's heritage and future generations.

As such, it should be seen as separate and distinct from the other 298 sites put forward for development under the Call for Sites none of which have these attributes.

The 1939 Agreement gives UDC the platform from which to champion an environmental flagship that will provide a notable and worthy legacy.

1. EASTON PARK: an unsustainable site for housing development

It is not the purpose of this paper to rehearse these arguments which have been well developed over the past four years, notably in the Public Inquiry of July 2019. The following list is provided as an aide memoire.

- **Proximity to airport.** Given what is now known about the impacts on health from living close to a busy airport through pollution and noise, it would be **grossly irresponsible** to build a major new town within five kilometres of one of the UK's most active airports, in line with the prevailing wind, adjacent to one of the main day time flight paths and directly beneath one of the main night flight paths.
- **Coalescence.** Easton Park would be an extension of Great Dunmow since the gap between the two would be just 300 meters. If the 1,200 additional houses on the Land West of Highwood Quarry were to be allowed, this narrow gap would be lost through access to this part of the development. Such coalescence is unacceptable, contrary to the spirit of TCPA principles highlighted under para 8c of the POST and contrary to para 8e of the POST.
- **Impact on Great Dunmow.** This market town is already struggling with an exponential rate of growth. An adjoining development of the scale proposed would destroy the character of this historic market town.
- **Access.** Access to Easton Park is limited to the B1256 quarry entrance which is grossly inadequate for a development of the size proposed. Access to the west is precluded by the airport, to the east by Great Dunmow and to the north by the rolling topography.
- **Congestion.** This limited access would result in prohibitive congestion notably on the B1256 Bishops Stortford Road, a key exit/access route for Great Dunmow. This is neither practical nor compatible with UDC's climate targets.
- **M11 and mainline train services.** Easton Park provides no direct access to either the M11 or the mainline train services. The M11 can only be accessed through the overloaded Junction 8. The only access to the mainline London/Cambridge train line is via a four-kilometre single track spur to the airport which runs through a single bore tunnel for 1.5kms.
- **Environment.** Thanks to its 700 year history, Easton Park retains an exceptionally vibrant environmental base with a wide diversity of flora and fauna – see details on the Biodiversity Mapping Tool
- **Heritage.** On heritage grounds alone, Easton Park fails the sustainability test – see Section 5.
- **Gas pipeline.** The pipeline running up the west side of Easton Park precludes building within a significant limit.

Easton Park does not provide a sustainable solution to UDC's housing requirements, nor can it ever do so.

But it provides an outstanding and unique opportunity for an environmental flagship.

2. OPEN SPACE: the UDC analysis of February 2019

The UDC Open Space Assessment Report dated February 2019 was submitted to the July 2019 Examination of the last draft plan following the deadline for Hearings Statements. The appraisal should have been conducted at a far earlier date so that it could have informed the Sustainability Appraisal. Furthermore, since it is dated Feb 2019, it should have been submitted immediately thereafter rather than in July.

The document submitted as ED 14B shows that Uttlesford is surprisingly short of Open Space at **5.81 ha per 1,000** of population of which **75% is accounted for by Hatfield Forest**. The document seeks to justify the figure of 5.81 by reference to Fields in Trust which it claims suggests 1.80 ha per 1,000 as a guideline. FiT is not a suitable reference since it is exclusively involved with urban sites. Conversely, Natural England, in their letter of 5 April 2019 on Hatfield Forest filed as ED 9 suggest **8 ha per 1,000** as does the National Trust Mitigation Strategy for Hatfield Forest filed as ED 17. **Excluding Hatfield Forest, UDC has just 1.4 ha per 1,000.**

It is regrettable that this shortage of open space has not been highlighted in the POST notwithstanding that the point was made to the Local Plan Leadership Group (LPLG) in an email from SEP dated 30 July following discussion of the POST by the LPLG on 29 July.

UDC has an acute shortage of open space and limited opportunity to rectify this shortage.

The shortage is most acute in the south, if Hatfield Forest is excluded as it must be given the risk of limited access – see Section 3.

Easton Park provides the ideal solution to resolve the shortage of open space and provide protection for Hatfield Forest.

3. HATFIELD FOREST: the pressures faced

Hatfield Forest is a unique asset of the District designated as both a National Nature Reserve (NNR) and a Site of Special Scientific Interest (SSSI). As such, the National Trust as owners are legally obliged to observe the provisions of the Wildlife and Countryside Act 1981 and to preserve the asset.

Annual usage of Hatfield Forest over the past 10 years has increased from 250,000 to over 500,000 resulting from extensive house building within its primary catchment area, seen as a radius of 15kms. This presents a significant threat to an asset which is seen as unique in England and arguably Europe as the only surviving medieval deer forest.

Detailed analysis of the threat to Hatfield Forest was provided by **Footprint Ecology** in their Visitor Survey and Impact Management Report of 2018 which was summarised by the **National Trust** in a letter dated 17 May 2019. These were used as the basis for a submission by Natural England filed as ED 9 and a draft Mitigation Strategy by The National Trust filed as ED 17.

These various papers, acknowledging that the National Trust may be forced to limit access if it is to fulfil its obligations to protect the forest, highlight that the most effective way of protecting the forest is to provide alternative facilities nearby.

Easton Park at 5 kms distance provides the ideal and only effective solution for the protection of Hatfield Forest.

It also resolves UDC's lack of open space.

4. THE 1939 AGREEMENT: facts and interpretation

There appears to be some confusion surrounding this agreement.

The facts are:

- The agreement was signed in 1939 covering 810 acres being the historic Easton Park.
- The agreement precludes development of more than ten dwellings on this 810 acres.
- The successor parties to the agreement are UDC and Landsec.
- The agreement remains in force as acknowledged by the two successor parties in 2011 when they signed a Deed of Variation to allow for the current gravel extraction.
- Under this Deed of Variation, the two successor parties agreed in 2011 to uphold the 1939 Agreement in all other respects.
- The Deed of Variation requires full restoration of Easton Park, as specified in the related planning permission ESS/65/06/UTT which also limits extraction to a maximum of 14 years from commencement
- The Land East of Highwood Quarry which is the subject of the current planning application lies outside the area covered by this agreement

Under this agreement, UDC has the **responsibility** to prevent development on Easton Park and thereby the ability to do so.

If UDC were to seek to sidestep this responsibility it would be open to challenge and might need to demonstrate that it was both **necessary** and **appropriate** to do so. It would be difficult to argue that it is **necessary** given the submission of 298 other sites under the Call for Sites together providing for some 60,000 homes. Equally, it would be difficult to argue that it was **appropriate** to do so given that Easton Park does not provide a sustainable solution as demonstrated in Section 1.

UDC has both the responsibility to protect Easton Park from development and the right to do so.

The existence of this Agreement gives UDC a unique opportunity to promote the development of an environmental flagship.

5. HERITAGE: the facts

For the 500 years from the Reformation to World War II, the Uttlesford District was dominated by the two great estates of Audley End and Easton Lodge.

The Easton Lodge Estate reached its zenith at the turn of the 19/20th centuries following which it went into decline due to the collapse of the agricultural market and the extravagancies of the Countess of Warwick compounded by WWI resulting in major sales in 1919 and 1921.

The estate was requisitioned by the War Office in 1940 which led to the loss of allegedly 10,000 trees on Easton Park to build an airfield for one of the leading US bomber squadrons. The estate was returned to the Maynard family in 1950 by when the house was severely damaged and so pulled down, bar the west wing. However, there remains an exceptional legacy of buildings which together provide a remarkable insight into the working of a great country estate at the turn of the 19/20th centuries— see Appendices A & B.

Easton Park allocated as a 10,000 home Garden Community formed a key part of the failed Local Plan of 2019. UDC were advised at both Regulation 18 and Regulation 19 of the catastrophic impact such development would have on the heritage assets in and around the ancient deer park (see LEPC Reg 18 and 19 consultation responses). UDC's own evidence base identified the negative impacts but this evidence was ignored throughout the process in an ultimately unsuccessful attempt to justify the selection of Easton Park as a Garden Community site.

The folly of this strategy was laid bare at the Examination in Public when the evidence came to light and Historic England (amongst many others) voiced their objections to the proposed development site.

The Inspectors' post-hearing letter of 10th January 2020 stated:

“Having visited the site and considered the evidence before us, we share Historic England's view that the sensitivity of the historic environment has not been adequately considered by the Council and we conclude that unless evidence is produced to show that it could be acceptably developed, development should not take place within this part of the site. Consideration would need to be given to what implications this has for the capacity of the site and its viability”. (Inspector's Letter Paragraph 98).

“In addition, the Heritage Impact Assessment fails to consider the historic asset of Stone Hall (a Grade II listed building) to the south of the site which was not accessible at the time of the survey. Historic England notes that Stone Hall responds to a wider rural setting which contributes to its setting. This is a serious omission that undermines the reliability of the HIA and would need to be reconsidered.” (Inspector's Letter Paragraph 99).*

Easton Park has again been submitted by Landsec under the Call for Sites notwithstanding the lack of sustainability of this site as outlined in Section 1. The heritage impacts alone clearly indicate that Easton Park is not a suitable site for large scale development.

A restored Easton Park would provide Uttlesford with the open space and outdoor facilities it needs but also an interesting visitor attraction based on its exceptional heritage.

The GII listed Gardens of Easton Lodge provide an exciting and successful precedent for the further use of volunteers.

6. RESTORATION: a real possibility

UDC has it within its powers the ability to promote the restoration of Easton Park through exercising its responsibilities under the 1939 Agreement.

If Easton Park is not allocated under the new draft Local Plan, the current owners, Landsec, have limited options of which restoration might well prove the most attractive.

The pressures on major corporates from regulators and investors to promote environmental benefits and the wellbeing of local communities are now very considerable but it is not easy for them to find suitable opportunities to do so. For a major property company such as Landsec, with a huge portfolio of office space and shopping facilities, Easton Park provides a rare opportunity likely to be significantly more valuable as an 'off-set investment' than the proceeds of a sale on the open market as agricultural land.

In July 2020, SEP issued a document entitled **Vision for a new Country Park in Uttlesford** which was widely circulated and well received both by local communities and many environmental organisations.

A restoration could be promoted by UDC with support from Landsec, ECC and other suitable bodies and could be substantially funded through grants.

Easton Park provides Landsec with an exceptional opportunity to create an environmental flagship and an asset of enduring value for future generations. The restoration of Easton Park is a real possibility, if UDC makes it clear to the owners that the site does not provide a sustainable solution to housing requirements and so development is not a possibility.

7. FACILITIES to be provided on a restored Easton Park

The SEP Restoration Document of July 2020 provided a detailed list of facilities that might be included in a restored Easton Park including:-

- Avenues of trees for walking
- 5 kms tracks round the perimeter to cater for running, cycling and horse riding
- Sports fields for field sports to relieve the overused facilities of the area
- Car parking with access limited to the B1256 quarry access
- Café
- Educational facilities
- Visitors Centre
- WWII museum
- Children's play areas
- Adventure playgrounds
- Allotments
- Picnic areas
- Gym/keep fit circuits
- Wildlife habitats
- Heritage trail
- Facilities for musical events

Part of the park could be retained for agriculture, possibly using new sustainable farming techniques.

These facilities combined with the **heritage assets outlined in Section 5** would together create a significant **Visitor Attraction**.

The Gardens of Easton Lodge to the north of Easton Park and **Stone Hall**, 22 acres now in the ownership of the Essex Wildlife Trust, to the south would form integral parts of a restored park.

The exponential growth of Uttlesford in recent years, particularly in the south, has left the district short of open-space and suitable facilities.

Uttlesford is the only district in Essex without a country park.

Hylands Park provides a magnificent facility for the people of the Chelmsford District and a suitable precedent.

Easton Park is the perfect solution in the perfect location.

8. ENVIRONMENTAL FLAGSHIP: biodiversity ring, Nature Recovery Network and Queen's Green Canopy

The SEP Restoration document of July 2020 focused on the creation of a Country Park on the **810 acres** that is the historic Easton Park which is subject to the 1939 Agreement. This area might sensibly be expanded to encompass the **1,000 acres** covered by the WWII airfield.

An additional and equally exciting possibility is to surround a restored park with a '**biodiversity ring**' linking the various woodlands that surround Easton Park: High Wood, Stone Hall, The Lays, Philipland Wood, The Gorse, The Gardens of Easton Lodge, the reservoir and the Little Easton Conservation Area. This would increase the area to some **1,500 acres** and provide an ideal habitat for wildlife.

A biodiversity ring surrounding a restored park would complement a park designed to provide facilities for local residents within nature by a ring designed to give wildlife a similar opportunity with each benefitting the other.

Together, a restored park and a bio-diversity ring provide the key link for a **Nature Recovery Network** from **Hatfield Forest to Thaxted** the other components being The Countryside Protection Zone, and the Tilty/Chelmer valley to Thaxted. This would reflect the great forest of Essex which once stretched from Epping to Thaxted and potentially provides the base for a NRN from Epping to Thaxted. See map at Appendix C

The Queen's Green Canopy is an initiative to mark the platinum Jubilee of 2022 with tree planting across the country. Easton Park provides UDC with the ideal opportunity to support this initiative with the restoration of the four great avenues of trees that were the primary feature of Easton Park since it was laid out in the baroque period as evidenced by the Skynner engraving of 1756, see page 14 of the SEP Vision document. These avenues remained visible until destroyed to build the airfield in WW11.

Easton Park provides the opportunity for a flagship environmental project comprising a restored park, a biodiversity ring and a Nature Recovery Network with each of the three aspects reinforcing each other. The restoration of the baroque avenues of trees would enable UDC to make a meaningful contribution to the Queen's Green Canopy initiative.

CONCLUSION

Easton Park does not provide UDC with a sustainable solution to its housing requirements.

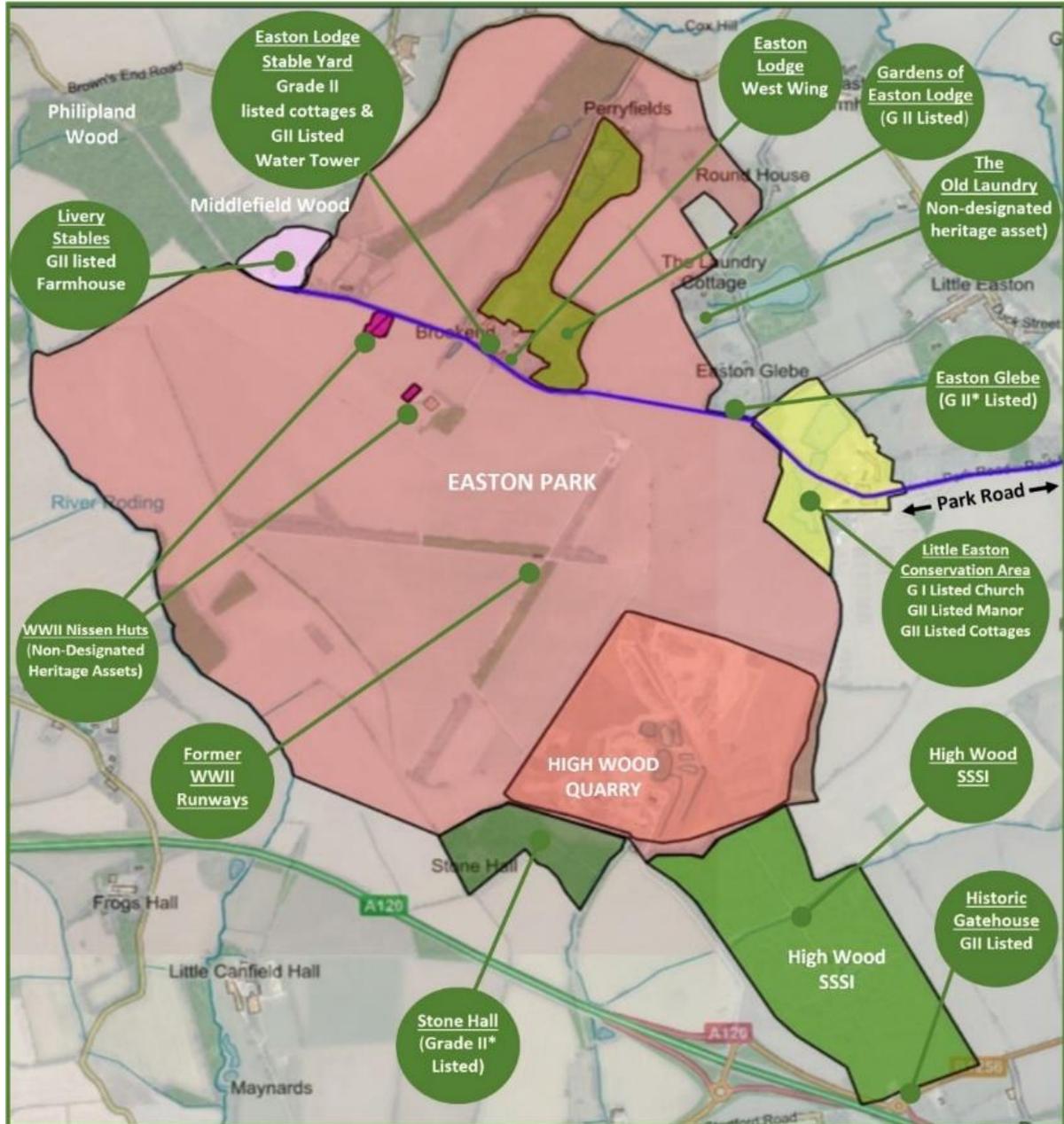
However, it provides a quite exceptional opportunity for UDC to promote an Environmental Flagship for the benefits of its residents, its environment, its heritage and future generations.

Thanks to the foresight of the Countess of Warwick and the 1939 Agreement, UDC is in the enviable position of being able to promote this flagship project to create a worthy legacy.

STOP EASTON PARK

November 2021

APPENDIX A – EASTON PARK HERITAGE ASSESTS



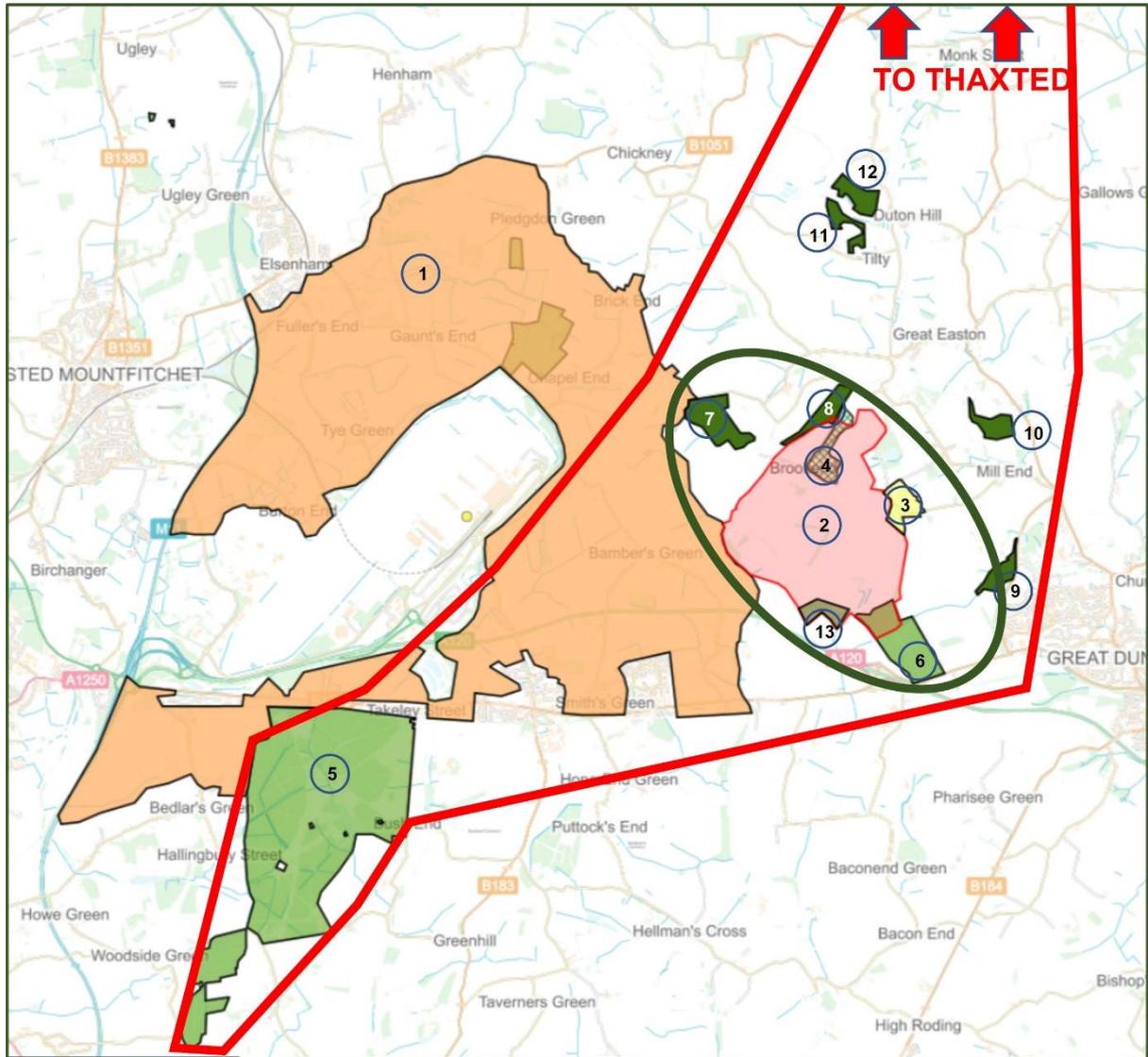
APPENDIX B – IMPACT OF DEVELOPMENT ON EASTON PARK HERITAGE ASSETS

The UDC *Heritage Impact Assessment produced for the withdrawn Local Plan, (Donald Insall Associates Jan 2019)* found the following impacts on some of the heritage assets in and around Easton Park:

Asset	Impact	Potential Harm
Little Easton Conservation Area	Major Change Conservation Area on site boundary relating rural setting with urban setting	Major Harm Degradation of setting on boundary of asset which informs the character and historic context of the asset and degradation of historic and visual connection of conservation area with Easton Lodge and Easton Glebe
Gardens of Easton Lodge	Major change Asset within proposed site Introduction of built development replaces rural setting of asset with urban setting.	Degradation of wider setting which informs the character and historic context of the asset.
Easton Lodge	Major change Asset within proposed site. Introduction of built development around asset replaces rural with urban setting.	Major Harm Loss of relationship, historic connection, of the asset to its rural setting
Easton Lodge Stableyard Cottages	Major change Asset within proposed site. Introduction of built development around asset replaces rural with urban setting.	Major Harm Loss of relationship, historic connection, of the asset to its rural setting
Water Tower Easton Lodge	Major change Asset within proposed site. Introduction of built development around asset replaces rural with urban setting. Views to tower from wider rural setting potentially obscured by proposed built development	Major Harm Loss of relationship, historic connection, of the asset to its rural setting
Brookend Farmhouse	Major change Asset within proposed site. Introduction of built development around asset replaces rural with urban setting.	Major Harm Loss of relationship, historic connection, of the asset to its rural setting
Easton Glebe	Moderate to Major Change Asset on site boundary. Introduction of site adjacent to asset replaces rural setting of with urban setting and obscures visual connection between the assets	Moderate to Major Harm Degradation of setting on boundary of asset which informs the character and historic context of the asset and degradation of historic and visual connection of conservation area with Easton Lodge and conservation area
Nissan Huts	Moderate to Major Change	Loss of relationship, historic connection, of the asset to its rural setting

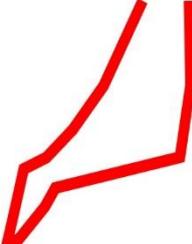
N.B This is just a selection of the closest assets in or adjoining the proposed site. Adverse impacts were also evidenced on numerous other heritage assets.

APPENDIX C – BIODIVERSITY RING AND NATURE RECOVERY NETWORK



KEY		
1	Countryside Protection Zone (CPZ)	
2	Easton Park	
3	Little Easton Conservation Area	
4	Gardens of Easton Lodge	
5	Hatfield Forest SSSI	
6	High Wood SSSI	
7	Philipland Wood Middlefield Wood The Lays	
8	Broxted Common Wood	
9	Hoglands Wood	
10	Bush Wood	
11	Horne Wood	
12	Eseley Wood	
13	Stone Hall	

 = Easton Park Biodiversity Ring

 = Nature Recovery Networks Area