

North Weald Bassett PARISH COUNCIL

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Clerk to the Council. Susan De Luca

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Also sent via email: appcomment@eppingforestdc.gov.uk

14th July 2023

Dear Nanayaa

Ref: EPF/1323/23 Land South of Vicarage Lane, North Weald Bassett: EIA scoping consultation report

Please accept this as the response from North Weald Bassett Parish Council to planning application EPF/1323/23.

Air Quality and Climate

Table 5.1 identifies that there are potential significant effects on local air quality both during and post construction, as well a significant amount of dust during the construction phase. The report goes on to state that the management of dust will be dealt with by standard and proven best practice construction measures set out in guidance to minimise 'temporary' effects from dust generation, and that these measures will be implemented through a construction management plan (CMP) and no significant effects are predicted. Table 5.1 clearly identifies there is a potential significant effect, so these statements are contradictory. Furthermore, building is expected to take place over a minimum period of 8 years. For the residents of North Weald Bassett, this is not classed as temporary or short term, and will undoubtedly have a significant impact on the wellbeing of residents for a considerable amount of time. Table 5.2 even recognises that the Receptor Importance / Sensitivity is classed as 'High' for the Neighbourhood Population. In addition, table 6.1 under 'Local Environment and Amenity' identifies that Construction works may affect the amenity of local residents and users of the public rights of Way. As such the Parish Council recommends that this matter is included in the EIA for full review.

Community, Social and Economic Effects

Table 6.1 states under the Lifestyle / Standing of Living component that the nature of the proposed development means that it will not affect local standards of living. The Council respectfully disagrees. The applicant needs to recognise that local residents are used to living in a relatively rural village setting with access to the open countryside with clear and unobstructed views, and that for many they chose this village to live because of this reason. The Neighbourhood Plan feedback identified under the question 'What do you like about the area' that its ruralness and countryside, village feel, and its peace and quiet where the highest valued features of the area. For many, the development will change these valued features. As such, the Parish Council feels that the assessment in terms of impact on standards of living has been incorrectly assessed, and should be included in the EIA for a more formal, full review to ascertain how the new development will affect local residents, and what (if anything) can be done to mitigate this.

The Parish Council is glad to see recognition of the potential significant effect on health and wellbeing through the generation of noise and emissions to air, provision of public open space and increased

demand for and provision of healthcare services, and fully supports these matters being included in the EIA for review. One of the biggest concerns of local residents is the impact this development will have on the health provision in the village (specifically GP / Health services) available not only to current residents, but future residents. Access to a GP is already very challenging, and although the development will be providing a 'building' to house such services, a full assessment of need should be undertaken to increase the likelihood of the health service being actually provided, rather than just the building itself. The Parish Council also supports the provision of a full health impact assessment that will be submitted as a stand alone document as part of the planning application, however asks that this assessment is not simply a desk based exercise conducted by a consultant in another part of the country, but by way of real time, 'on the ground' experiences of local residents, who try to access these services on a daily basis.

Paragraph 6.11 identifies that there is the 'potential for construction works adjacent to the public rights of way on site to pose a risk to public safety, however, as the construction site will be securely fenced, it is considered that there is no potential for a significant effect.' Surely this is the purpose of the EIA itself to establish how any identified risk should be mitigated, and not for the scoping report to come to its own conclusion that a secure fence will resolve the issue. The Parish Council feels this matter should be included in the EIA for formal review.

Cultural Heritage

Paragraph 7.9 states that the undeveloped nature of the site means it has the potential to contain archaeological remains, but then goes on to say that archaeological investigations have already been carried out on site and found very limited archaeological evidence, indicating there is no potential for a significant adverse effect on archaeology as a result of the proposed development. Once again, this is a matter for the EIA to address, given that it is recognised there may be significant historical archaeological remains, with some evidence already being found. The EIA should set out the extent of the archaeological assessment and investigations that needs to take place on site, or at the very least assess that the work undertaken by the developer to date is sufficiently robust. It should not be up to the developer themselves to decide this. As such this matter should be included in the EIA.

Landscape and Visual Effects

The Parish Council is glad to see that all matters concerning landscape and the visual impact will be considered as part of the EIA. Specifically, the views from sensitive visual receptors into the site (which includes residential properties) along with the impact in terms of night time lighting on residents should be given close attention. As part of the site visits identified in the methodology under paragraph 10.12, specific site visits in times of darkness should be conducted to clearly understand the current position, especially concerning residents in Queens Road, Oak Piece, top of School Green Lane, Blackhorse Lane and Vicarage Lane West.

Natural Heritage (ecology)

The Parish Council supports the proposed items detailed in table 12.2 to be included in the EIA.

Noise and Vibration

The Parish Council is disappointed that no matters concerning noise and vibration are proposed to be included in the EIA, especially given it is recognised in paragraph 13.1 that the development has the potential to generate noise and vibration during site preparation and construction, while additional road traffic has the potential to increase noise levels both during and post-construction. The scoping report states that matters of noise and vibration will be assessed either by way of a construction management plan or individual assessments. Once again, surely the purpose of an EIA is to recognise the significant likely effects of a development, and to identify what action needs to be taken to mitigate these measures. It should not be up to the developer to decide that it can mitigate a particular effect before it has even been assessed properly. It is suggested that all matters above a 'medium' receptor importance / sensitivity should form part of the EIA to provide confidence to the current community of North Weald Bassett that these matters will be duly and properly considered.

Traffic and Transport

Whilst not directly related to the EIA, it would be remis of the Parish Council not to raise the following points concerning paragraph 14.1. For the past 7 years, the Parish Council has been expressing concern regarding the impact in terms of traffic and additional vehicles this and other new development will have on the existing residents of North Weald Bassett Parish, and have consistently been told that the traffic modelling identifies that it will not cause a significant problem. It is, therefore, with interest to read in paragraph 14.1 that:

'The proposed development will lead to increased traffic on the local road network during and post-construction, which has the potential to lead to associated effects on pedestrian severance, driver and pedestrian delay and pedestrian amenity. There will also be an effect on the local road infrastructure, as the proposals will create new site access junctions. Pedestrian and cycle links will be provided through the site and existing bus services may be extended to serve the site.'

Firstly, this is the first acceptance in written terms that the traffic will have an effect on our local roads – something the Parish Council has been raising for some time. Secondly, it is phrases like 'bus services <u>may</u> be extended to serve the site' that embodies everything which is wrong within the planning system. How can it be that the provision of public transport to serve a minimum of 1,050 new home community is not deemed non-negotiable. The failure to provide public transport to this site will have a serious negative consequence on the entire village and its residents, and goes entirely against government, county, and local planning policy to create sustainable developments, as well as EFDC's own commitment for a clear and recognisable modal shift.

The Parish Council calls into question the traffic densities that have been used in table 14.1. The Parish Council itself recently undertook two informal surveys (points of survey being Skipps Corner and outside the post office, North Weald Bassett), which showed 600 vehicles per hour on one occasion, and 650 per hour on another (both undertaken in 2023). Whilst not scientific, it is essential that a more accurate and up to date review takes place. The Parish council is therefore pleased to see that both the impact on increased traffic generation postconstruction and changes to local road infrastructure will be considered as part of the EA. It is also happy to note that a transport assessment (TA), which will assess the impact of the proposed development on the capacity of highway infrastructure, which has been scoped with Essex County Council and National Highways will be submitted in support of the planning application. The Parish Council is glad to see elsewhere in the document that the possible cumulative affects of the Latton Priority Development, and the North Weald Airfield Development have been recognised, and hopes that both these developments will be considered as part of a joined up Transport Assessment and modelling for the site. As an additional further measure, in order for those parties / consultants completing the transport modelling and assessments to obtain a true understanding of the transport challenges affecting the village of North Weald Bassett, it is recommended they travel to, and navigate around the village using public transport.

The new development has the possibility of exacerbating an already notorious rat run along Church Lane between Vicarage Lane West and Wellington Road. As such, the Parish Council feels this matter should be given particular attention in the EIA.

Water Environment

North Weald Bassett village has a history of flooding. Historically, severe storms resulted in rapid surface run-off and flooding problems in 1985, 1987 and 1989. A flood alleviation scheme was introduced in 1989, however flooding was still experienced in North Weald Village due to the unprotected Thornhill catchment. As a result of another large storm in June 1993, a scheme for the Thornhill catchment was initiated and completed in 1996. Given this history, it is disappointing to see that there are no planned water issues identified as being included in the EIA, especially as some have been identified as having potential significant effects. Paragraph 16.11 identifies that the increased impermeable area associated with the development of the site has the potential to lead to increased runoff rates and increased risk of surface water flooding. This is of extreme concern to local residents. Whilst the report identifies that many of the identified significant affects will be dealt with by either the construction management plan,

or individual assessments, the Parish Council feels that by including them within the EIA will ensure the scope of these individual reports is given the importance it needs.

Cumulative Effects

The Parish Council fully supports the statement made in paragraph 17.3 which recognises that close proximity to the Airfield development site means that there is the potential for significant cumulative effects, particularly in relation to traffic and transport, and that for completeness and to ensure a robust assessment, it is proposed to include this allocation within the cumulative effects assessment. The same applies for the statement in the following paragraph concerning the cumulative impact that allocation SP4.1 – Latton Priory – may have on the development in North Weald given its scale and that it too will be included within the cumulative effects assessment.

Yours sincerely

Cllr Alan Buckley

Cllr Alan Buckley Chairman, on behalf of North Weald Bassett Parish Council

cc. North Weald Bassett Parish Councillors Cllr Chris Whitbread Cllr Holly Whitbread Cllr Les Burrows Cllr Jaymey McIvor Cllr Richard Morgan Mr Alex Burghart MP