



North Weald Bassett

PARISH COUNCIL

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4th February 2022

Dear Georgina

Statutory Consultation on Strategic Masterplan for North Weald Airfield December 2021 – January 2022

The response below represents the views of North Weald Bassett Parish Council to the above stated consultation.

This response is in two parts. Part A raises concerns generally regarding this particular Masterplan process, and Part B looks at the detail of the proposals submitted.

PART A – THE PROCESS

The Council asks the question why only part of the North Weald Airfield Masterplan Area is being consulted upon. According to the Submission Version of the Local Plan (SVLP) including the Main Modifications proposed, the North Weald Airfield Strategic Masterplan Area consists of the following:

- EFDC Allocation NWB.E4A
- EFDC Allocation NWB.E4B
- North Weald Airfield (operational airfield area)

which collectively make up the North Weald Airfield Strategic Masterplan Area.

Policy P 6 (N) of the SVLP states that 'Development proposals at North Weald Airfield must comply with a Masterplan for the North Weald Airfield.' Please note the wording requiring a 'single' Masterplan, and not a number of Masterplans (plural). Therefore, it is clearly the intention of the Local Plan that one Masterplan should be created for the Airfield and that all proposals for the Airfield Masterplan Area should accord with that single Masterplan.

The proposals in this consultation state on page 1 that the 'Strategic masterplan and associated consultation are specifically related to the allocated employment site of the North Weald Airfield Masterplan Area', thus effectively splitting the Masterplan Area identified in the Local Plan. If this is the case, it does not address the future uses of North Weald Airfield as a whole, including setting out the type of aviation and activities proposed for the active airfield site, and only considers the employment allocations. This therefore suggests that a further Masterplan (or even Masterplans) will be created to cover the remaining areas. The SVLP makes no distinction between the employment allocations and the operational airfield and views the masterplan area as one area. Paragraph 2.92 in the SVLP states that 'Strategic Masterplans for sites wholly in the ownership of the Council are likely to be of a more detailed nature.' Clearly this is not the case as a large part of the Masterplan Area has been entirely omitted and this Consultation does not explain, nor offer any justification, as to why this is the case. It also gives us no indication of what the next step is concerning the operational airfield area, and if another Masterplan will be forthcoming.

Policy P 6 (O) (ii) of the SVLP sets out that the Strategic Masterplan for North Weald Airfield must make provision for the 'retention and expansion of aviation uses to the west of the main runway'. The Strategic Masterplan

currently being consulted upon does not include any detail of proposals west of the allocated employment areas, and as such the consultation fails at the first hurdle. This was raised by the Parish Council at the first consultation also. Whilst the current proposals may have considered the uses on the airfield and how they influence what is being proposed on the allocated employment areas, there is no information as to what is being planned for the operational airfield site. Splitting the masterplan area and considering them separately has led to a disjointed, segregated approach – an approach that EFDC would not accept for any of the other masterplan areas in the Local Plan, and an approach which does accord with Policy P 6 is the SVLP.

14% of comments from the first consultation expressed concern about air, noise and light pollution as well as a potential increase in airfield activities, however without considering the future of the operational airfield as part of this masterplan, how can these concerns be considered and addressed? It should also be noted that the Consultation website simply refers to North Weald Airfield Strategic Masterplan, and as such gives the impression that it covers the whole site. This further supports the fact that the Masterplan is flawed.

The Parish Council is unable to support this Masterplan as the plans / proposals do not include the entire site as defined in the SVLP, and as such are not inclusive and does not comply with EFDCs own policy in the emerging Local Plan.

The Parish Council would also like to draw your attention to paragraph 2.94 of the SVLP which states that the 'Strategic Masterplan will be produced by the landowners/promoters of allocated sites, in partnership with the Council and relevant stakeholders including the Parish Council.' Whilst the Parish Council has been involved from a consultation perspective as per paragraph 2.95 of the SVLP (having been invited to respond to the two consultations that have taken place to date), its involvement and any meaningful input to the production of the Masterplan itself has been limited to two Zoom meeting lasting less than three hours in total, and where the proposals were presented to the Parish Council and comments requested. This is insufficient to fulfil the statement that the plan has been **produced in partnership with** the Parish Council. Partnership suggests collaborative working, not being informed of what has been decided.

In summary, the consultation is flawed, primarily because it fails to fulfil the requirements of Policy P 6 of EFDCs own Local Plan (SVLP) as it does not cover the entire Masterplan area, but also because there are too many unknowns and unanswered questions including but not limited to:

- Failure to identify (and consider) what the future operation of the airfield will be
- Failure to identify (and consider) what the relationship between the employment allocation and the operational airfield will be
- Failure to identify how the security of the Airfield Operational side will be maintained and how any access points will be managed, along with why these access points are needed and who will be able to use them.
- Failure to identify where the Epping Road access to the operational airfield will be

PART B – THE PROPOSALS

Notwithstanding the concerns raised in Part A, the Parish Council would like to raise the following points concerning the proposals submitted as part of this consultation.

Transport / Traffic / Vehicle Movements

By far the biggest concern for both residents and the Parish Council is the increase in traffic that will be generated by this development, and the effect this will have not only on the local road network, but on the quality of life of residents of North Weald Bassett Parish. This was the most frequent issue raised by local residents to the first consultation.

The Parish Council is pleased that some of the concerns raised during the first consultation regarding access to the site have been listened to which has resulted in the through route proposed between Merlin Way and the Epping Road no longer being proposed. However, the Council has consistently raised concerns regarding the cumulative impact of traffic from not only this site, but the North Weald Bassett Masterplan Site and the Latton Priory Masterplan Site, and we have asked on numerous occasions that a combined assessment of traffic impact should be conducted for all three masterplan sites collectively. This is the only true way of fully assessing the impact that an increase in traffic will have on our residents and the road network. The question as to why a combined traffic forecast / survey covering the three major development sites has not been completed has so far been met with responses including 'we have spoken to other developers and seen their reports', 'it's the job of highways to agree this', and 'it's for the local plan inspector to sort'. To date, it is our understanding that this joint approach / assessment has not been completed. The Parish Council has been told that Essex County Council has seen the traffic impact assessment for the site and is happy with the proposals, however surely this

information should be made public as part of the wider consultation process so stakeholders can make informed representation on the development being proposed. The Parish Council remains seriously concerned at this stage regarding the impact of traffic on the Parish and would not support any proposals where the full impact of traffic has not been duly considered.

Access Points

The masterplan paperwork is inconsistent when it comes to access points onto the employment area. The majority of the maps suggest there are three proposed access points, two of which are located off Merlin Way, and the third being the existing access from Epping Road which is to be retained. However some of the maps clearly show a fourth access point at the northern part of the area off Merlin Way which solely serves the largest proposed structure on the employment site. This is further confused by the wording on page 53 of the Masterplan document which states that 'Two vehicular points of access should be maintained from Merlin Way including the potential reconfiguration of the northern point as a primary access'. This needs to be clarified.

With regard to the southern most access point off Merlin Way, it should be recognised that this is in very close proximity to the neighbouring housing development. The Masterplan clearly states that it is likely some of the industrial area will have 24/7 operation, and as such this access point should be moved so as to protect the amenity of local residents. The entire Employment Area is likely to have increased hours of operation across the whole site when viewed against current activity, and it is entirely inappropriate that neighbouring residential properties should be subjected to 24-hour movement of HGVs. This level of vehicle movement would undoubtedly cause serious disruption to these residents. As such, it is proposed that the access point be moved further north (see Appendix 1 for suggestions).

The other proposed access to the site is off the main High Road into Hurricane Way. During the consultation sessions, the Masterplan Team advised that this access would only be for the following:

1. Access by vehicles to the smaller units proposed in the south-eastern element of the development (thus restricting the likelihood of access by HGVs, and prohibiting access of any vehicles to the middle and northern parts of the employment area).
2. Access by public transport buses by way of a gated system to serve the entire employment area.

Whilst there is already an access point from Hurricane Way currently serving both Bassett Business Units and Bookers, it is unclear at this stage how the proposals would affect the type and frequency of traffic flow into this access point, and as such it has not been satisfactorily demonstrated that the proposals would not be detrimental to neighbouring residents and the local road network. Furthermore, in order to protect the Lower Forest (a Site of Special Scientific Interest) surely EFDC should be taking this opportunity to discourage access from the south, especially when considering that the consultation states this would attract very limited traffic movements which could therefore easily be accommodated via the Merlin Way access.

The Parish Council also has concerns about the wording of the proposed bus service, specifically referencing page 7 of the consultation where it states under 'Sustainable Movement' that a 'new sustainable bus link could be accommodated through the site'. These concerns also relate to page 10 under the transport and movement sections which states a "possible new bus route to link the site with Epping underground station, North Weald Bassett village and the surrounding areas'. In order to fulfil the criteria of the Local Plan in terms of modal shift, it is vital that a new bus link be provided to the site from Epping and the surrounding areas, and this wording should be strengthened to emphasise it must happen. This bus route is also referenced on page 8 under the Movement Framework, and also on page 11, but with more positive phraseology. This ambiguity does not instil confidence that there would in fact be a new bus route. It is also worth pointing out that bus route SB11 should be removed from paragraph 2.29 on page 15 of the Masterplan document as this route is no longer in operation.

Church Lane

Regardless of access points, serious consideration needs to be given to how Church Lane will function in the context of both Masterplan development sites being proposed in the Village. Whilst to date both Masterplan teams recognise there is a need to consider the impact of development on Church Lane, neither one is putting forward proposals as to how this will be dealt with, including the North Weald Airfield Masterplan Team. Church Lane is a narrow, dangerous, rural road, well used as a rat run, and also more frequently by HGVs (for which it is unsuitable). Proposals within this Masterplan talk about improved links to what is being referred to as the 'urban extension' of North Weald (a phrase the Parish Council does not support given the villagers desire for North Weald to remain a village) with improved pedestrian and cycle access between the two sites, however unless the issue of Church Lane is addressed, any such access points between the two sites and through the SANG area will be too dangerous to use. Somebody needs to take ownership and responsibility of this issue to ensure it is addressed. Who will this be? Frequently we are told this is not the responsibility of the Masterplanners, but Essex County Council, and if so Essex County Council should liaise with its partners (which

includes the Parish Council) to consult them on ideas and suggestions for a suitable solution. The Parish Council will not support any proposals that do not adequately consider the future of Church Lane and its function between these developments.

New Entrance Point to Airfield

The EFDC SVLP Policy P 6 (O) (iv) states that the Strategic Masterplan must make provision for 'a new access from Epping Road to service the west of the site.' The lack of clarity as to the extent to which this consultation is the 'North Weald Airfield Strategic Masterplan' means that the Parish Council cannot determine if this policy requirement should have been included (Part A of this letter refers). Given there has not been any indication that another Airfield Masterplan is being or will be created, the Parish Council must assume this policy requirement is not being fulfilled, and as such the proposals do not meet with the Policy requirements in the SVLP.

Connectivity

There are a number of references throughout the document proposing that the new Cycle and Walking infrastructure could link up with the train station, however it is unclear why this is being proposed. At this stage it is assumed this is referring to the Epping Ongar Railway (EOR) at North Weald. This railway is a Heritage Railway line that operates as a visitor tourist attraction and is not a functioning railway line providing a commuting link. No rationale for this suggestion has been included, nor are there any plans detailing how this would work. In order for the site to have any chance of being truly sustainable, a cycle link between Epping and North Weald is needed, however this is not even suggested within the proposals.

Parking

Page 53 of the main masterplan document states under 7.42 'Where appropriate, parking will be provided in line with national and local parking standards, however sustainable modes of transport will be encouraged where possible to encourage modal shift'. In addition, paragraph 1.9 on page 6 suggests that dependent on the types of business that take up space at the airfield, there is the potential for between circa 1,600 and 2,900 new jobs to be based at the site. This would require a significant number of vehicles, and at this stage the plans do not indicate the number of parking bays being proposed. Furthermore, the wording concerning sustainable bus transport opportunities throughout the Masterplan is both non committal and woolly, and as such the Parish Council has no faith that a modal shift will be achieved, resulting in a considerable increase in traffic movements in the Parish. As the Transport Assessments have not been made public, it is unclear how many extra movements this would be. It is essential that a regular, frequent bus service is provided from the very start of the project to ensure this sustainable transport options becomes a viable, realistic alternative to car use.

Heritage

The Parish Council fully supports the renovation of the Grade II Listed Control Tower for alternative, specifically, community uses. However when considering the Site Evaluation information (page 4 of the consultation paperwork) point 1 under the Heritage Category talks about 'possibly' increasing public access to the Control Tower as part of a 'potential' conversion. This statement seems very vague, whereas other statements are written with a more concrete approach. Differences in the terminology used sows the seed of doubt regarding whether certain aspects of the proposal will in fact be delivered. As an example this is particularly evident on page 9 of the consultation report under the land use Framework which states:

- Larger units **will** be located to the north of the site
- Smaller units **will** be located toward the south of the site
- The museum **should** be retained
- A new north / south green corridor **will** be provided
- Community uses **could** be located in the development site

The Parish Council would like to raise the question as to why there is a shift from 'will' to 'could' when it refers to community uses. This is evident throughout the document and implies that the certainty of community uses is less so than other elements of the masterplan. This is unhelpful and should be rectified within any final Masterplan endorsed by EFDC to provide certainty to the residents of North Weald that they are guaranteed some community benefit as part of the proposals, especially concerning the Control Tower. Again, the Parish Council cannot support this aspect without the certainty presently missing.

Page two of the proposals state that there will also be open spaces located throughout the site to provide the opportunity to hold the outdoor market. The Parish Council has concerns as to the feasibility of this, especially considering these spaces have not been indicated on the illustrative site plans so an assessment as to the feasibility of suggestions can be made. Furthermore, the weekly market attracts visitors from all over the county and further afield who visit using a private motor vehicle, and the proposals do not indicate where the vehicle

parking would be accommodated and how this would impact on the Employment Area. The proposals as submitted do not address this issue sufficiently.

There is some confusion concerning what is proposed for Hanger 1. Throughout the supporting paperwork it is referenced that Hanger 1 has historic value, however the Site Strategy Map on page 30 of the full Masterplan does not identify Hanger 1 as a building to be retained. At the 29th January consultation event, Hanger 1 was stated as having a 'safer package' in place and that this was 'being retained', however nothing within the Masterplan suggests this is the case. As such, it is unclear what will become of this important element of airfield history.

Environmental

The Parish Council has concerns regarding the proposed spatial layout and the potential impact on the safety of aircraft, specifically regarding a wildlife enhancement area on the northern part of the site being so close to the runway. This has the potential to attract a wide range of wildlife including birds, which can be extremely dangerous to aircraft. There are also a number of attenuation areas south of the site which are close to the runway. There is no evidence presented to confirm that these areas will not cause a safety concern to the operational element of the airfield. Further evidence needs to be presented regarding this. In addition it is suggested that the buildings could have 'green roofs which do not attract birds', however it is unclear how this could be achieved.

In principle the Parish Council supports the proposed Energy Centre, which we have been led to believe is a fully sustainable energy system which will support the energy needs of the whole site, however there is very little information within the consultation documentation specifying exactly what this would be, including details of noise. Further details would be needed for the Parish Council to give a more informed opinion, however the principle of clean energy is supported, subject to this not being to the detriment of local residents.

The proposal maps identify the SANG area, however the Masterplan team confirmed during the online Zoom session on 11th January that the identified area for SANG was not in fact the final area of SANG, but more of an indicative space. This is not clear within the consultation paperwork, and as such has led to a false perception by local residents that the entire area indicated is the final SANG Area. This needs to be rectified.

The Movement Framework on Page 8 suggests the re-introduction of the former airfield access as a new Heritage Trail, however it is not clear what this Heritage Trail would consist of. This is also referenced within the full Masterplan document. Further details are required.

The building heights proposed range between 9-16 meters. Any building heights must not be so high as to jeopardise either the future use of the operational airfield or dominate the skyline of North Weald.

Page 10 of the report under 'Landscape Led Design' states that such a design is an integral objective of a Garden City. The North Weald Airfield site is not a Garden City, and as such this reference should be removed as it causes both confusion and concern.

The Parish Council is uncomfortable with the wording used on page 10 under the 'Social and Economic Wellbeing' heading, which states that the scheme will need to 'minimise' any negative environmental effects on the health and wellbeing of building users. The Parish Council seriously questions a Masterplan process where any negative effects on the health and wellbeing of building users could be deemed acceptable, and the Council would not support any proposals where this was the case. The Masterplan team are asked to consider the purpose of this bullet point, and question in what circumstances would any level of negative environmental affect be acceptable.

Phasing and Delivery

The supporting wording under Phasing and Delivery states that the bus route through the site will be delivered when the service is viable, however taking this approach will allow for poor patterns of behaviour to take hold, including car use. It should be a requirement that the developer (EFDC) provides a number of subsidised bus services for a number of years from the very start of the project to ensure a sustainable bus service is embedded in the development, otherwise how will the Highway Authority know when a bus service is viable if there is no service to test this against? It is essential such bus services are in place from phase 1 to ensure poor patterns of behaviour do not become the norm. It is the developer's responsibility to ensure the development meets the sustainability targets.

The Parish Council supports the Cycle and Pedestrian green link that would run along the eastern boundary of the site, however the supporting wording states that the provision of the new green link through the site will follow in sequence with the development of each phase. This means the sustainable access to the site will not be usable until the entire site has been developed. This will also lead to poor patterns of transport behaviour, and it is suggested the entire green link be created starting at Phases 1 and 2.

CONCLUSION

North Weald is a Village – a characteristic greatly valued by its residents. Any development proposals **MUST** respect the village setting, ensuring the lives of residents are not detrimentally affected, especially concerning traffic generation, noise and pollution (including light). At present, the Parish Council is not satisfied that enough work has been done to evidence that the village would **NOT** see a negative impact as a result of proposals put forward and cannot support the proposals that have been presented.

Yours sincerely


[electronic copy]

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Chairman, North Weald Bassett Parish Council
Sent on behalf of the Parish Council

cc. Cllr Chris Whitbread, Leader EFDC
Cllr Nigel Bedford, Deputy Leader & Planning & Sustainability Portfolio Holder
Forward Planning Department, EFDC
Cllr Peter Bolton, EFDC
NWBPC Councillors
Mrs Susan De Luca, Parish Clerk

Appendix 1



 = Proposed possible alternative second access point away from residential areas.

 = Access Point to be removed.