

North Weald Bassett PARISH COUNCIL

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Clerk to the Council Susan De Luca

Sukhi Dhadwar Planning Department Epping Forest District Council 323 High Street Epping Essex

Sent by email: sdhadwar@eppingforestdc.gov.uk

15th August 2024

Dear Sukhi

EPF/1449/24 Scoping Report Proposed Data Centre, North Weald Airfield

Please accept this letter as the formal response from North Weald Bassett Parish Council to the above stated planning application. We would also like to take this opportunity to thank you for allowing the Parish Council to provide a response, as we are not always invited to do so when it comes to such matters.

Traffic and Transport

Table 2 on page 19 of the Scoping Report indicates that Traffic and Transport will be 'scoped out' of the report. There are a number of reasons included within the report which set out to justify this approached. Specifically, paragraph 13 on page 3 of the Transport Topic Sheet states the following:

'The number of vehicle movements during the demolition and construction period is difficult to quantify at this time as this would be dependent on the phasing of the Proposed Development, timing of construction works, and potential to balance material on-site, which is still subject to consideration. Notwithstanding this, it is considered that the vehicle numbers would be of a level that can be screened out. This is based on the project team's experience on working on developments of a similar scale and nature.'

This paragraph is in effect confirming traffic and transport issues are a 'guestimate'.

Paragraph 18 of the same Topic Note sets out that the 'guestimate' levels of traffic shown in Table 2 would result in just a 7% and 1% uplift in traffic on the A414 and M11 respectively when compared with the DfT figures in Table 1, and that this level of traffic uplift is not significant and far below the Rule 1 and 2 thresholds identified in relevant IEMA guidance. It is understood that the report has considered the cumulative effects of one nearby development, namely the Vistry/Countryside site set for 1,050 new homes, however it fails to consider that at the same time the proposed Data Centre development is likely to be built (being over a 2-5 year period) the following developments are also likely to be in a build phase, all of which will likely use the M11 and/or the A414:

• NWB.E4B - North Weald Airfield Employment area - intensification

- 590 homes at Ongar (three of the sites currently going through the planning process)
- THOR.R1 Thornwood (both sites currently going through the planning process)
- THOR.R2 Thornwood (planning permission in place EPF0332/22)
- SP4.1 Latton Priory part of the HGGT Developments minimum of 1,050 (more likely 1,500) new homes.
- SP4.3 East of Harlow – part of the HGGT Developments Minimum of 750 new homes
- SP4.2 Water Lane part of the HGGT Developments Minimum of 2,100 new homes

Paragraph 17 of the same Topic Note suggests that the vehicle movements of the proposed development would **replace** existing operations on site including North Weald Market that attracts significant numbers of vehicle journeys on the day it is open. However, it is our understanding that the Market is set to remain, albeit in a different location.

All of these factors (the additional surrounding development, the market traffic, the guestimate) indicate and suggest that **Transport and Traffic should be** '**Scoped-in**' to the report, and we request this takes place.

Heritage

The Parish Council is pleased to see that Heritage has been 'scoped-in' to the report. We ask that particular attention is paid to the following heritage elements:

- Wider consideration is given to including the whole airfield in this element of scoping, to ensure all heritage aspects are considered across the whole historic airfield site.
- North Weald Airfield Control Tower This is a Grade II listed building. There is a clear suggestion within the report that the control tower be considered for deconstruction and reconstructed at an alternative location. A report to clearly understand the ability to deconstruct and reconstruct this building safely without causing damage should be commissioned. Should there be any doubt in the ability to safely reconstruct the building, it should not be moved. The Parish Council should be consulted and part of the consideration process for a possible alternative location for this control tower.
- Whilst there is no mention of this within the report, it is assumed that the WW2 Hawker Hurricane Gate Guardian will be moved. The Parish Council should be consulted and part of the consideration process for a possible alternative location for this Guardian, the suggestion in its name being that it should be located at the new entrance to the operational aviation side of the Airfield.
- There is a Norwegian Memorial at the Revetment near the Squadron on the aviation side of the Airfield. This has never been maintained and has fallen into disrepair. Again, this should be considered for relocation to the new entrance to the operational aviation side of the Airfield.

Water Resources, Flood Risk and Drainage

With regard to Water Resources, Flood Risk and Drainage, we are again disappointed to see they have been 'scoped-out'. There are two elements that need to be considered. It is appreciated that the developer believes these can be dealt with by way of planning condition, however for clarification the following matters are of concern:

Thames Water have confirmed that neither the North Weald Bassett Sewage Treatment Works, nor the Thornwood Sewage Treatment Works have the capacity to deal with the cumulative impact from development in the Parish. The Scoping Report Topic Note for this subject states under paragraph 15 that 'A 150mm diameter Thames Water public foul sewer is identified as serving the existing airport and is located south of the site within Merlin Way. The existing airfield foul loadings are pumped to this network'. The purpose of Scoping is the process of identifying those environmental aspects that may be significantly affected by the proposed development, and in doing so, the potential significance of effects associated with each environmental aspect becomes clearly defined, resulting in the identification of issues to be addressed in the EIA. Clearly if Thames Water are saying that the STW does not have capacity, this should be deemed a significant effect (when viewed cumulatively).

 With regard to Surface Water, to date every development being proposed for the Parish of North Weald Bassett Parish (including the Data Centre) is discharging its surface water into the Cripsey Brook. Cripsey Brook is known to regularly flood, and the section on the A414 between North Weald and Ongar is a 'Flood Warning Area', meaning at times of high water there is a danger to life. As such, we believe this factor has the potential to cause a significant effect (when viewed cumulatively).

It is for these two reasons that we believe that **Water Resources**, Flood Risk and Drainage should be 'Scoped-in'.

Yours sincerely

[email copy]

Susan De Luca Clerk to the Council North Weald Bassett Parish Council

cc. NWB Parish Councillors