



North Weald Bassett PARISH COUNCIL

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Clerk to the Council.

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EPF/1793/24

Mixed Use Development delivered in phases comprising of up to 1,340 dwellings (use class C3); Residential Care and Supported Accommodation (C2), mixed use local centre (comprising Commercial, Business and Service Uses (Class E (a), (b), (c), (f) creche/nursery (g) offices, and (e) medical/health services), residential uses (C3), residential institutions (C2), Local Community Uses (F2(b)), hot food takeaways, public house, wine bar (sui generis), mobility hub); Traveller pitches (5); Learning and Non-residential institutions (Class F1) including 2FE primary school (with early years and childcare provision) and secondary school (with provision for indoor sport, recreation or fitness use and associated sports pitches); Suitable Alternative Natural Greenspace (SANG) Green Infrastructure including formal (including playing fields with changing facilities and associated infrastructure) and informal open space, allotments, play space (including Neaps/Leaps/MUGA), walking and cycling routes, amenity greenspace, parks and gardens, natural/semi natural greenspace, new and retained landscape and woodland, biodiversity enhancements); sustainable drainage systems; movement network comprising new highway, cycle and pedestrian routes (including new vehicular access points from Rye Hill Road and B3193 London Road; car parking; engineering works (including ground modelling); demolition and other supporting ancillary infrastructure (including utilities, pumping stations, lighting electricity substations and secondary mobility hubs)" (all Matters Reserved except Junctions onto Rye Hill Road and B3193 (London Road)) (a phased development each phase being separate and severable part of the development).

Please accept this letter as the formal response from North Weald Bassett Parish Council to the above stated planning application.

Before commenting on the application itself, the Parish Council would like to draw the attention of the District Council, Developers, Site Promoters, and Residents of North Weald Bassett Parish, to the Position Statement Published by the Parish Council in January 2024 (a copy of which is appended to this response at Appendix 1). First and foremost, the Position Statement should be taken as being the primary position of the Parish Council.

Summary

Whilst the Parish Council accepts this site is allocated for development, and understands the only matters to be agreed as part of this application are Site Access, it must **OBJECT** to this application on the following grounds:

- Inadequate provisions of a frequent bus service to Epping Station to make it attractive to new residents
- Directing more traffic onto the M11 J7 roundabout without a clear timeframe and understanding of works needed to improve the junction capacity
- Lack of clarity regarding the future of Rye Hill Road.
- Number of dwellings proposed too high
- Local knowledge and experience of the Rat Run issues on Rye Hill Road, and dangers of entering onto the B1393 from the Rye Hill Road Junction
- Local knowledge and experience of traffic queues on the B1393 going towards the M11 J7 roundabout, often tailing back beyond the current access to Latton Priory, that contradicts desk-based studies supplied as part of this application
- Local knowledge of surface water and property flooding along Rye Hill Road.
- Too many proposed speed limits along the B1393 causing confusion for road users
- Cumulative impact on local roads, and the M11 J7, when taking into account other developments in the local area and Harlow
- Lack of clarity as to when, and if, the southern Sustainable Transport Corridor will be created, and the impact this would have on travel behaviour
- Lack of clarity as to when the B1393 junction would be created
- Lack of clarity on Stewardship arrangements
- Lack of safe cycling provision towards Epping
- Height of Buildings
- Impact of additional traffic on The Plain junction at Epping, and through Thornwood
- Lack of a Construction Management Plan
- Lack of clarity as to how existing residents of both Thornwood and Hastingwood can sustainably access the site to make use of the benefit

Justification and Detail of OBJECTION:

1. Site Access – B1393/London Road

- The plans submitted state that the Rye Hill Road access will be completed first, however there are no details about when the B1393 access will be completed, or the phasing / delivery. This will have an impact on the sustainable transport options for new residents, as well as the use of Rye Hill Road in the short term by both construction traffic and those using it as a cut through. This needs to be clarified.
- With regard to the Left Turn only for vehicles existing Latton Avenue onto the B1393, this will require all vehicles existing the site to have to go onto M11. Whilst this solves one issue of discouraging vehicles from travelling towards Epping, it creates three problems.
 1. The first is that people will simply use the Rye Hill Road connection to the B1393 as an alternative, adding more traffic onto this very narrow road making it more dangerous than it already is.
 2. The second is that more vehicles will be pushed onto the M11 at peak times, increasing traffic flow issues and the degree of saturation of this junction.
 3. The third is that vehicles will chose to use the entrance to the Latton Priory Farm track or McDonalds to turn around to save them navigating the M11 roundabout.

None of the options proposed are good, each creating their own issue.
- The date range used for the Trip Rate Information Computer System (TRICS) data is 01/01/15 to 01/01/20 – nearly 5 years ago, with an allowance made for post COVID changes in working patterns. In addition, the largest of the 'test' sites is only 354 units, which when compared to the suggestions of up to 1,500 homes bears no resemblance at all to this development. An updated, more relevant, TRICS assessment should be completed to clearly understand anticipated traffic flows from the development. In addition, since this time numerous additional developments have been agreed (including nearly 200 in Thornwood alone!) - have these figures been included in the data to understand the 'real' impact on the B1393 and Junction 7? There needs to be a full, cumulative traffic assessment completed and understood by Essex County Council and National Highways to determine the full impact of all the developments, not only on the B1393 but also the M11 Junction 7 and wider road networks.

- North Weald Market operates on Saturdays and banks holidays, the result of which is nearly always a heavily congested M11 J7, and severe delays on most local roads. This issue is known to EFDC, ECC and other relevant bodies. Has this been considered by the applicants, and if so where is this detailed in the supporting evidence documents?
- With regard to the speed limit, the Parish Council supports the proposed change in speed limit along the B1393 from J7 of the M11 to 40MPH, however the 40MPH should **NOT** stop just past the newly proposed junction to Latton Avenue, but continue all the way up to the Thornwood Common Village envelope, where it should drop to 30MPH, returning to 40MPH as you enter the Lower Forest section after exiting the village, and remaining so until you reach Epping.

2. Site Access – Off Rye Hill Road

- The Parish Council has concerns regarding the proposed access off Rye Hill Road. The road is narrow and unsuitable for two passing vehicles at the proposed entrance points, and it is unclear from the plans how this road would be sufficiently widened to ensure safe access. In addition, there are concerns the impact this would have on the ditch that runs to the eastern side of the road, and the hedging and landscaping along the road itself. There are also concerns about the impact the additional traffic this will have on the wellbeing of local residents.
- The Parish Council has concerns over the proposed location of the equestrian route access point across Rye Hill Road onto / from the Drovers route. Once again this is on an extremely narrow bend, and whilst equestrian visibility may be possible, visibility from vehicles to see people and horses using this crossing is limited. In addition, the behaviour of many drivers of vehicles who use this route as a rat run is such that it would endanger anybody crossing at this location. This would perhaps be a different case should Rye Hill Road be stopped up, which as yet has not been agreed.
- The Parish Council supports the reduction of the speed limit to 30MPH along this section of Rye Hill Road, and asks that appropriate measures are put in place to enforce this.

3. Sustainable Transport Options

From its inception, it has been recognised and documented that the success of the Harlow and Gilston Garden Town (HGGT) is dependent on the Sustainable Transport Corridors (STC) which connect the four new communities with, and through, Central Harlow, helping to achieve the 60% modal shift target. In fact page 30 of the Latton Priory Design Codes document (under 03/Movement Site-wide sustainable movement) states the following:

The delivery of sustainable transport infrastructure will be critical to the success and sustainability of the new community at Latton Priory.

It seems that over time, this requirement has moved from being classed as an 'Essential' item of infrastructure, 'critical' to the success of Latton Priory, to being a 'long term aspiration' (as detailed in the September 2023 HGGT IDP Update). Copious amounts of evidence is contained within EFDCs, Harlow's, and HGGTs adopted plans and supplementary planning documents as to why the early creation and co-ordinated approach to the STCs are vital to the success of not only the Latton Priory development, but the whole of the HGGT development.

The Transport Assessment suggests that as there is no clarity as to when (if) the southern STC will be created, a bus service strategy will be implemented instead, with links to Harlow Station and Epping Station (page 29 and Figure 7.2 of the Transport Assessment refers). This will be by way of an **hourly** bus service until **1,000 homes** are built, after which it would increase to a 30 minute service. The assessment states that priority bus lanes will improve bus journey times which is likely to encourage travel by bus. However, this fails to consider the peak hour issues and long delays with access into Epping, including leading up and through The Plain junction (which operates over capacity and has no scope for improvement), as well as access through Epping Town itself. It is accepted that buses will take vehicles off the road, but they must be frequent and reliable for people to use them. One bus per hour is simply not frequent enough to make any meaningful change to travel behaviour, and

to suggest this will be the case until the first 1,000 homes are built (approx. 2,400 people) is not acceptable. There is a clear failure to recognise how attractive travel into London via Epping Tube station is, and the 'meanwhile' measures suggested are insufficient.

In terms of policy references regarding sustainable travel, there are simply too many to reference, however a few are detailed below with this Council's emphasis in **bold**:

Para 3.1 of the HGGT Infrastructure Delivery Plan identifies that the:

'East-West and North-South Sustainable Transport Corridors are a **key element of the infrastructure required to integrate the Garden Town Communities** with the built-up area of Harlow and achieve the aim to make walking, cycling and public transport the most attractive option in line with Garden City Principles.'

Paragraph 4.9.2 of the HGGT IDP states that:

'For the Sustainable Transport Corridors to be effective in achieving the modal split targets for the Garden Town, they will need to **work as a network rather than piecemeal interventions**. Accordingly, the network is considered to represent a **single strategic item of essential infrastructure**. These strategic sites must all achieve a 60% modal split target. To support sites in achieving this target, and **ensure the network is operating holistically**, the apportionment is based upon the number of dwellings that each site is contributing to the Garden Town's growth'

Page 20 of the HGGT Vision under 'C - Integrated transport: a viable and preferred alternative to cars to achieve a modal shift', states that 'A new approach to travel will **transform the Garden Town** and the way people move around it. **Town-wide Sustainable Transport Corridors will support active travel** as well as a mix of affordable, high quality public transport options.'

Paragraph 2.123 of EFDC's Local Plan states that:

'The Council has prepared a Sustainable Transport Corridor Study for the Garden Town and endorsed the Harlow and Gilston Garden Town Transport Strategy. The provision of sustainable transport options together with a significant modal shift from car to non-car use (including walking, cycling and public transport) **are central to the successful growth of the Garden Town.**'

Para 2.124 of the EFDC Local Plan states that:

'In order to maximise the promotion and use of active and sustainable transport modes, **it will be necessary for sustainable transport provision, including, as appropriate, connection into and contributions towards the Sustainable Transport Corridor network, to be commensurate with the phasing of development of Garden Communities. This is required to prevent the establishment of unsustainable travel behaviour**, and to provide viable alternatives to private car use.'

Page 4 of the HGGT Developer Information Pack for Latton Priory states:

'As part of the delivery of Sustainable Transport and Mode Share Objectives for Harlow and Gilston Garden Town (HGGT) **a key component is the delivery of the Sustainable Transport Corridors (STCs)**, which will facilitate a high-quality bus, cycling and walking network to serve HGGT. To link the strategic development sites of Gilston, Latton Priory, Water Lane and East Harlow into the STCs **there needs to be strong connections which are referred to as STC connectors.**

Policy SP3 Part C (Development & Delivery of Garden Communities in the Harlow and Gilston Garden Town) of the EFDC Local Plan identifies that the design, development and phased delivery of each Garden Community must accord with the following principles:

- (ix) Ensure that on-site and **off-site infrastructure is provided in a timely manner**, subject to viability considerations, **ahead of or in tandem with the development it supports** to mitigate any impacts, meet the needs of residents and establish sustainable travel patterns;

- (xiii) Contribute to the delivery of the Sustainable Transport Corridors and the establishment of an integrated, accessible and safe transport system which maximises the use of the sustainable transport modes of walking, cycling and public/community transport, and reduces single occupancy car use, in order to improve air quality, reduce emissions and promote healthy lifestyles. **Development must provide high quality, safe and direct walking and cycling routes and linkages to and from Harlow which give priority over vehicular traffic;**
- (xx) Ensure key transport interventions (such as highway improvements and provision of sustainable transport providing viable alternatives to the private car) are provided **commensurate with the phasing of development; and as a prerequisite of the occupation of development, where this is necessary to avoid significant harm.** Measures to ensure future upkeep/maintenance of sustainable transport provision will be required.

Policy SP4 Part G (Garden Communities Latton Priory) of the EFDC Local Plan identifies that SP4.1 will be brought forward on a phased basis for a comprehensive high quality development to include:

- (xi) **highway and transport improvements including to the North South Sustainable Transport Corridor**, works to Southern Way and Second Avenue corridor, and upgrades to Junction 7 of the M11;
- (xii) **satisfactory utility infrastructure including water, waste water, solid waste**, gas, electricity and telecommunications for occupants; and
- (xiii) bus services and direct pedestrian and cycle links between homes, the facilities that serve them and **other key destinations.**

Policy HGT1 of the Harlow Local Plan states that as the focus of the Garden Town, Harlow Council will expect the design, development and phased delivery of each Garden Town Community to accord with all the following principles:

- (a) ensure the timely delivery of on-site and **off-site infrastructure required to address the impact of the new communities**
- (f) on-site and **off-site infrastructure is provided**, subject to viability considerations, **ahead of or in tandem with the proposed development to mitigate any impacts**, to meet the needs of existing and future residents and visitors and to **establish sustainable travel patterns;**
- (i) create a step change in modal shift by **contributing to the delivery of the Sustainable Transport Corridors and establishing an integrated, accessible and safe transport system** which reduces car use and maximises the use of the sustainable high quality transport modes of walking, cycling and the use of public and community transport to promote healthy lifestyles and provide linkages to and from Harlow and the new Garden Town Communities;
- (p) key transport interventions (such as M11 J7a) and **provision of sustainable transport** (providing viable alternatives to the private car) will **need to be agreed prior to the development being permitted. Measures to ensure future upkeep/maintenance of sustainable transport provision will be required**

Section 3 (page 32) of the Latton Priory Design Code states that 'Public transport will be a key component of the sustainable transport strategy, and any future planning application must include details of proposed bus services, **including bus rapid transit, demand responsive transport and associated infrastructure.**'

The Vehicular movement strategy requirements within the Design Code under 3.14 states that 'Public transport must be integrated to provide a direct connection to Harlow via the Sustainable Transport corridor and to Epping via the new B1393 connector'. However, there are no clear plans for the STC, and as mentioned earlier this is now a 'long term aspiration'.

Page 37 of the HGGT Design Guide states 'Attractive and safe cycle links should be provided into Epping and connecting into surrounding bridleways.' At no time within the proposals are details of any attractive and safe cycle links to Epping included. Indeed, it is recognised within the SMF for Latton Priory that south of the development site, and following the existing roads, the village of

Thornwood Common, much of North Weald Basset and the town Centre of Epping are all within a 30 minute cycle of Latton Priory, however these are **only likely to be used by confident commuter cyclists in their current form**. Thus, the current cycling routes to Epping are neither safe nor attractive!

As mentioned earlier, the Harlow IDP identifies under TR28 that the Sustainable Transport Corridors and Town Centre Transport Hubs are **Essential**, setting out that essential means infrastructure which is necessary to mitigate impacts arising from the development... and...enables development to come forward in a way that is both sustainable and acceptable in planning terms.

Whilst the Parameter Plans submitted with the application suggest that there may well be a good level of connectivity within the site itself, this seems to stop at, or very close to, the site boundaries with very little planned to actually connect the development to the other key destinations. The developer should be responsible for funding, or completing work on, the PRoW and footpaths that fall outside of the development to ensure safe access to other locations.

4. Quantum of Homes / Building Heights

The Building Height parameter plan indicates that many of the development parcels will accommodate development up to 3 storeys, however page 64 of the SMF for Latton Priory states that buildings should be **2 storeys in height to maintain the natural horizon**. It goes on to state that this will make it challenging to achieve the number of homes that the site can deliver with densities required for vibrant placemaking and modal shift, stating that the heights need to be further tested in relation to topography, views, elevation and densities. However, the current application does not test this. As such, the Parish Council objects to any buildings over 2 storeys.

In addition, the HGGT Design Guide sets out that development should be set back from the Ridge Line, and that the roofline of new homes should **not go above the level of the horizon**. The SMF is at odds with this statement, setting out that to do so would mean not meeting the minimum 1,050 new homes. The Parish Council suggests that the starting point for design should be 1,050 homes, rather than going straight in with trying to fit 1,340 homes in the space. This potentially would mean being able to adhere to the HGGT Design Guide to set development back from the ridge line.

5. Construction Management Plan

Page 181 of the SMF for Latton Priory states under 'Construction and Logistics' that it is 'expected that the vast majority of the construction traffic will access the site from London Road, via the farm track or a haul road. A Construction Management/Traffic Plan **will be provided as part of the outline planning application** to explain how the construction traffic will access the site to ensure the existing highway network is not unduly impacted.' This has not been provided as part of this application, and with uncertainty around when the B1393 access would be created, it is unclear exactly how vehicles would access the site.

6. Open Space

Page 113 of the SMF for Latton Priory states that 'A green infrastructure, open space and play strategy will be developed further based upon these established principles **at the outline application stage** to set a 'design code' for standards, design and delivery of open space and play provision at the reserved matters stage.' This Council cannot see that such a strategy has been included in this outline application.

7. Stewardship

Page 179 of the SMF for Latton Priory states that 'The Stewardship Strategy to be developed **as part of an outline application will set out an appropriate stewardship model** which will also provide opportunities for community led projects and meanwhile uses to reflect community interests and to link into food production which will be taking place on site.' Whilst a document has been included within the outline application, it does not set out an appropriate stewardship model, but is instead a collection of ideas and suggestions. EFDC Local Plan Policy SP3 includes principle (iv) which advises 'agreeing appropriate and sustainable long-term governance and stewardship arrangements for community assets including heritage assets, greenspace, the public realm and community and other relevant facilities **prior to the determination of outline planning** applications. The Parish Council would also like to make

it clear that it no longer has any interest in being responsible for the stewardship of any parts of the Latton Priory Development.

8. Utilities

Page 183 of the SMF for Latton Priory states that a 'high-level utilities layout should be established **through future outline planning applications.**' This has not been provided as part of this application. In fact, there is very little detail especially concerning foul waste, so at present we have no idea how the waste on the site will be dealt with. Indeed page 187 sets out that as part of the validation requirements for an outline planning application a Utilities Report (to include high level utilities layout) should be included. Page 54 also states that 'a future outline Planning Application will be accompanied by the pre-development enquiry results, ensuring that the requirements for Thames Water infrastructure upgrades **will be known and presented as evidence** to ensure delivery has been considered and built into the wider fabric of development viability. We do not believe this information has been provided.

Conclusion

Much of the HGGT development is built on hopes, aspirations, ideas and dreams. But this **MUST** be underpinned by logic, planning, honesty and contingencies. The hope to have a highly sustainable community where 60% of movements are made by non-car modes of travel is a fantastic idea, however the reality is that without reliable, frequent, accessible, useable, alternative, safe options to a car, this will not be achieved and will simply create more problems.

As submitted, the application fails to demonstrate to this council that the impact on the B1393, Rye Hill Road, J7 of the M11, Thornwood Common, The Plain Junction, Epping Upland, and Epping itself, would not be detrimental to the living conditions of residents in our parish and the Epping forest District, and it is for these reasons that this Council **OBJECTS** to this application.

The Parish Council is willing to speak at a planning committee of EFDC.

Yours sincerely

[Electronic copy]

Susan De Luca
Clerk

cc. North Weald Bassett Parish Councillors

POSITION STATEMENT - DEVELOPMENT OF NEW HOMES IN THE PARISH OF NORTH WEALD BASSETT

The Epping Forest District Local Plan was formally adopted in March 2023. Included within it are the allocation of a number of sites in the Parish of North Weald Bassett for new housing development, set to take place between now and 2033. These sites are detailed on the following page. In total, the villages of North Weald, Thornwood and Hastingwood, are set to see **at least 2,286 new homes**, along with redevelopment of North Weald Airfield providing an additional 40 hectares of employment space along with a site from which EFDCs waste operation fleet (bin lorries and other associated vehicles) will operate. There will also be further development around Ongar, Epping and Harlow.

For over 6 years now the Parish Council, along with the Neighbourhood Plan Steering Group, have tried to raise public awareness of this development, including posting leaflets through doors, articles in village life, and regular updates on social media. We have been involved in the Local Plan process from the start (2011), and have been working with developers using the feedback received from you following the Neighbourhood Plan questionnaire, in the hope of trying to influence the development which is coming our way in terms of how its designed, heritage, open space, traffic and transport, respecting the village feel of our areas and respecting our current population.

We have been through tens of thousands of pages of documents and proposals, looked at all the available evidence, represented our residents at every opportunity we can, expressing both concerns and in some cases support, sat through the Local Plan process, and tried as much as possible to ensure we influence all development proposals.

HOWEVER... The Parish Council is now at the stage where it has become unbelievably frustrated with what are clear gaping flaws in the Planning System. These flaws allow for each development site to progress entirely separately to others in the local area, meaning developers are not required to talk to each other. Whilst they state that they are required to consider the impact of other development in the area, we are yet to see any tangible evidence of this. The Parish Council is also not confident that the approach taken by both Epping Forest District Council and Essex County Council is a collaborative one. This is especially relevant when it comes to the highly probable traffic impact to our Parish as a result of all this new development.

The Transport Assessment Report dated January 2019 submitted as part of the evidence base for the Local Plan (EB503¹) states that *'The analysis demonstrates that the combination of more ambitious sustainable modal shift, changes in travel behaviour and a package of physical highway improvements **could potentially mitigate** the most significant impacts of the Local Plan'*.

The Parish Council understands the need for new homes, and will continue to strive to work with both developers and the relevant local authorities, however the **current position** of the Parish Council is as follows:

"North Weald Bassett Parish Council is NOT CONFIDENT that the resultant traffic as a consequence of the proposed development both within and outside the parish has been considered as a whole, and no evidence has been provided to show that residents WILL NOT suffer because of them. As such, it is our intention to hold the relevant authorities to account, to facilitate a joint forum where developers, the local authorities and the Parish Council can get together, so that evidence can be presented to Parish Council showing the traffic impact of this development, and what it means for our residents. Our Parishioners should not suffer any detriment due to this growth, and but should in fact benefit from these developments."

January 2024

Statement of North Weald Bassett Parish Council

¹ [EB503-Transport-Assessment-Report-Essex-Highways-January-2019.pdf \(efdclocalplan.org\)](#)