



North Weald Bassett PARISH COUNCIL

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EFDC
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1st October 2024

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EPF/1605/24

Outline application with all matters reserved except access for the erection of up to 195 dwellings and 5 gypsy and traveller pitches and associated parking and landscaping

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.

Whilst the Parish Council accepts this site is allocated for development, it must **OBJECT** to this application on the following grounds:

1. **Access from A414** - The Parish Council does not support the proposed permanent site access from the A414. Whilst it is accepted this may be a temporary requirement until such time as the new roundabout off the A414 is created, it should be a condition that this northern access off the A414 is closed as soon as access via the new roundabout is available. This is for reasons of highway safety. Furthermore, the Parish Council feels the suggested ghost island is not necessary (for use as a right hand turn into said access point), given it is only a short distance for vehicles to travel eastbound to the roundabout at the Talbot, and drive back so they can enter the site with a left hand turn only. This could be managed by way of a Routing Management Plan, and would be a safer option than what is being proposed. There should be a 'No Right Hand Turn' restriction at this location into the development. The creation of the ghost island will add to the already prevalent difficulty residents face crossing the A414 at this location using footpath 93. It would also negate the need for additional disruptive road works on the A414. Policy T1 Sustainable Transport Choices, parts C and E(i) of the EFDC Local Plan apply.
2. **Surface Water** - The proposed SUDs strategy does not accord with the proposed Green and Blue infrastructure detailed in Figure 6.4 - Green and blue infrastructure framework (illustrative and indicative) – within the Strategic Masterplan Framework (SMF). There are two areas of SUDs that are missing (see Appendix 2). The applicant has not demonstrated that the proposed SUDs provision is adequate to enable these two areas of SUDs to be omitted from the drainage scheme, and as such there are concerns regarding flooding at these locations. The current proposals are contrary to the

SMF. In addition, the Parish council would not support the proposed connection to the narrow surface water drains in Blackhorse Lane, and the applicant should agree a surface water drainage strategy with Thames Water either in conjunction with the developers of NWB.R3, or to be located along the A414. Policies DM5 Green and Blue Infrastructure (parts A(iii) and B(ii)), and SP2 (parts A(vii) and (xiv)), apply.

3. **Access via Blackhorse Lane** - The Parish Council does not support the provision of a pedestrian / cycleway into the development from Blackhorse Lane. Whilst the SMF mentions of this access point (page 85 stating that 'pedestrian connections should be retained from the existing points of PRoW at Queens Road and Blackhorse Lane'), it is proposed to divert Footpath number 93, and as such its access point will no longer be on Blackhorse Lane. In addition, this access point is not recorded within the SMF as being required within any of the following SMF access maps:

- Figure 3.37 - Combined opportunities
- Figure 4.3 - Visioning principles and masterplan drivers (page 59 Enhanced Public Rights of Way and active travel)
- Figure 5.2 - Landscape character, green spaces and green and blue infrastructure mandatory principles plan (illustrative block layout)
- Figure 6.7 - Proposed modified and stopped-up footpaths
- Figure 6.9 - Key destination routes
- Figure 6.11 - Pedestrian/cycle integration with existing village
- Figure 6.23 - Placemaking and wayfinding framework

Given the location of Byway 78, and its connection to the proposed newly realigned Footpath 93, the access point into / from Blackhorse lane serves no real purpose and is in fact superfluous and should be removed. This proposal is contrary to the SME, and Policy DM9 High Quality Design Part J. For clarification, the Parish Council supports the diversion of footpath 93.

4. **Gypsy & Traveller pitches** - The EFDC Local Plan was adopted in March 2023, within which was an identified need for 64 pitches, 5 of which would be on this site. Since this time, permission has been granted for an additional 3 pitches at Weald Hall Lane (EPF/0270/23), and a decision is awaited as to an extra 2 pitches at Woodside Place (EPF/0660/23). Should permission for the latter be granted, these would effectively supersede the need for the 5 pitches included under allocation NWB.T1, as they would have already been created in alternative locations. In addition, feedback the Parish Council has obtained from members of the Travelling Community suggests that there can be friction if different G&T family groups are located within close proximity to each other. In addition, whilst the Essex Design Guide encourages integration between both the settled and G&T communities, it is understood that both these communities prefer to live within their own space, and with a degree of separation between them. To locate a G&T site within such a large development of the settled community seems at odds with the wants and needs of both these groups, and the Parish Council suggests that given recent G&T pitch permissions in the parish, allocation NWB.T1 should be removed, as the quota has already been fulfilled within the already present G&T community in the Parish. Policies H1 Traveller Sites Development A(ii), and SP1 Spatial Development Strategy 2011-2033 part E(ii) - making the best use of existing traveller sites through intensification and/or extension, and the review of personal permissions where appropriate) apply.

5. **Foul Water** – It is understood that Thames Water have confirmed that the Sewage Treatment Plant in North Weald does not have the capacity to deal with foul waste from this development site. The submitted plan do not indicate how foul waste will be managed on, and beyond, the site. Paragraph 4.127 of the EFDC Local Plan states that 'development proposals should demonstrate that suitable arrangements are in place for foul water drainage and treatment, taking into account potential impacts on Groundwater Source Protection Zones in particular as well as the wider environment in general.' This has not been demonstrated in the current proposals, which is contrary to Policy DM18 On-Site Management and Reuse of Waste Water and Water Supply in the EFDC Local Plan, Parts A and B.

6. **Developable Area** – The Parameter Plan for the developable area included within the application includes two areas which are not identified within the SMF (see appendix 3). Within the SMF, these two areas are allocated for either water infrastructure or play, and as such should not include any built dwellings as identified in the Indicative Masterplan. To do so would be contrary to the SMF and Policy DM9 High Quality Design Part J.

7. **Housing Density** – The applicant has identified within the Housing Density Parameter plan that the parcels where Medium Density is proposed should be 35-50dph, however this is contrary to the SMF which states that the Medium Density area should be 35-45dph. The proposals should be amended reflect the densities in SMF. In addition, EFDC Housing Mix Guidance Notes suggests that flats and apartment blocks are only appropriate in areas of between 60-90dph, which contradicts the SMF. These proposals are currently contrary to Policy DM9 High Quality Design Part J
8. **St Andrews School** – The Parish Council and Neighbourhood Plan Steering Group have both been extremely vocal about the need for additional vehicular drop off / pick up facilities to serve access to St Andrews School from the north, and thus would need to be included within this development site. The Parish Council has publicly stated it would not support the expansion of St Andrews School unless this was provided, the rationale being it does not want to see an exacerbation of the already prevalent parking and access problems experienced by residents of School Green Lane, Beamish Close and Blackhorse Lane. The application proposes a pedestrian and cycle access to the north of the school grounds, however there is no proposal for a specific vehicular drop off point. It is the Parish Councils understanding that ECC would not support this as it would 'encourage parents to drive their children to school', which is why such a facility has not been included by the applicant. Whilst the Parish Council understands that some children will walk to the school, in today's modern society where it is not unusual that both parents work, many of the children will be brought to school by car for convenience. A failure to provide such a facility will simply make this problem worse, as parents will continue to park in local neighbourhood street causing friction between the school, parents, and the local community. Whilst the provision of a coach parking space has been created as part of the proposals, it is unclear how this would be managed. The Parish Council suggests alterations should be made to the proposals to make this more of a formal drop off and collection point for children attending the school, coupled with a space / location for a coach to park. Paragraph 3.87 of the Local Plan states that the district faces a number of travel related challenges, recognising that the majority of new developments will still need to accommodate the car, and that environmental, road safety and community impacts occur if an appropriate balance is not adopted.
9. **Trees** – The Arboricultural Impact Assessment supplied as part of the proposals is flawed, and includes a number of errors (e.g. Tree T299 is listed as not requiring works in one section, but being felled in another, and Tree T300 being classified as a category C tree in the plan, but listed as being a Category B tree to be felled). These errors suggest there may be numerous other issues or errors within the report, and as such the Parish Council is not confident an adequate assessment of the trees on the site has been completed. In addition, there are numerous trees on the site which are subject to a TPO which have not been included in the report. Local Plan Policy DM9 High Quality Design Part F applies.
10. **Play** – The Illustrative Masterplan submitted as part of the application suggests a play area (the size of which is not defined) be located in the south eastern corner of the development site. This is not supported by the Parish Council, nor is this in the location identified within the SMF under Figure 6.33 - Framework plan (illustrative and indicative). The location proposed by the applicant is entirely unsuitable, being located directly adjacent to an existing property (Rectory House). The proposal should be amended to ensure compliance with the SMF, which shows an alternative location on the eastern boundary of St Andrews School. Policy DM9 High Quality Design Part I(v) also applies.
11. **Health and Wellbeing** – The Parish Council notes the response to this application by the NHS Integrated Care Board, which states that this development is expected to bring in another 468 new patient registrations, and that due to the quantum of development taking place in Epping Forest they are expecting applications to close surgery lists to increase. The Care Board state that this development will have an impact on primary health care provision in the Tyler's Green/North Weald Bassett area and its implications, if unmitigated, would be unsustainable for the NHS. They have requested a financial sum of £326,040, and they intend to focus this money on options at North Weald Surgery and/or The Limes Medical Centre and The Ongar Health Centre. This could be by way of relocation, expansion of space, internal reconfiguration and/or refurbishment of the existing premises

to accommodate additional clinical rooms and/or for releasing space to allow repurposing by lifting the patient records to offsite storage or digitisation of them to create the space needed for reconfiguration. The Parish Council hereby formally requests that a condition should be placed within the S106 agreement for these funds that they **MUST** be used for the direct benefit of North Weald Bassett residents, and not for either Ongar Health Centre, nor to digitise or arrange for off site storage of files, which is the function of the NHS to address. The funds used should be used directly for access to healthcare provision (doctors, mental Health, etc) for the residents of North Weald Bassett, and **NOT** for the overall benefit of the NHS.

It is also noted that the East of England Ambulance Service have requested a financial sum of £72,345 for the impact of this development. They state that funding would be allocated toward the creation of a new Ambulance Hub at Harlow including EV charging provision to support NHS Carbon Net Zero target. This is where ambulances will start and finish before transferring to response post/ambulance station in the area of the development. Once again, the Parish Council would like a condition placed on the S106 agreement for these funds that they are used to directly benefit the healthcare of the residents of North Weald Bassett, and not to assist the NHS in meeting any carbon neutral targets it has set itself.

Informatives:

- The Parish Council would support a speed reduction along the A414 between the Talbot Roundabout and the new development roundabout to be 30MPH.
- The Parish council would expect to see the latest ECC parking standards adhered to as part of any reserved matters application, with parking designed and evidenced in accordance with the Design Guidelines for North Weald Bassett.
- The Design and Access statement suggests a possible design of homes which includes parking courts, which would not be supported. The developers should review the Design Guidelines for North Weald Bassett when designing the housing layout as part of any reserved matters application.
- The Parish Council supports the principle of improving access to the Memorial Playing Fields from the development, suggesting that this be agreed in conjunction with the Queens Hal Charity Trustees.
- The Parish Council questions the validity of the expected Peak Hour traffic movements to and from the site which are included within the Transport Assessment submitted as part of the application. The proposals are for 195 homes (estimate 468 individual persons), and to suggest that the maximum number of vehicle movements would be 65 in any one hour simply does not resonate with the current village of North Weald Bassett.
- The Parish Council will expect to see full details of the improvements to bus services included as part of any Reserved Matters application.
- There are number of errors in the submitted draft heads of terms, which should be rectified including paras 2.4 (the name of the school), and 2.7 (wording missing after 'new'), and 2.11 (suggests only one play area however there are two proposed). There is also a conflict in terms of which party is expected to fund utility upgrades, with the draft heads of terms stating that the utility providers have a statutory duty to fund and supply any required upgrades, but section 4.17 of the EFDC Infrastructure Delivery Plan stating that it is 'anticipated that developers would meet the cost of local upgrades in accordance with the charging schedule proposed by Defra'. This could be clarified and agreed.

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:

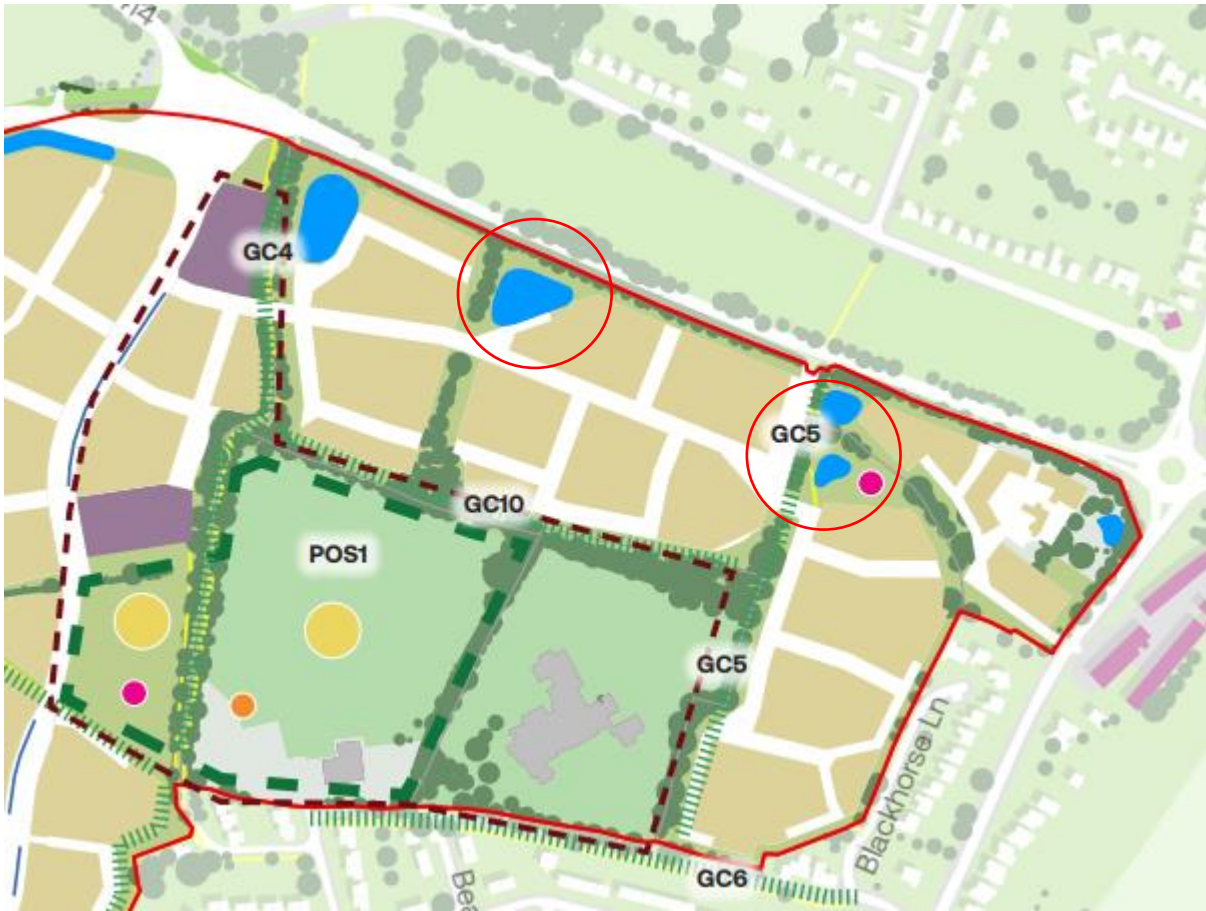
"North Weald Bassett Parish Council is NOT CONFIDENT that the resultant traffic as a consequence of the proposed development both within and outside the parish has been considered as a whole, and no evidence has been provided to show that residents WILL NOT suffer because of them. As such, it is our 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 \(efdclocalplan.org\)](https://www.efdclocalplan.org/EB503-Transport-Assessment-Report-Essex-Highways-January-2019.pdf)

Appendix 2



Extract from page 77 of the Strategic Masterplan Framework for North Weald Bassett.
Red circles indicate areas of missing SUDs.
The red circle in which GC5 is noted is known locally to flood with heavy rain.

Appendix 3



Figure 5.2 - Landscape character, green spaces and green and blue infrastructure mandatory principles plan (illustrative block layout). Red circles indicate areas that are identified within the SMF as being for either water infrastructure or play.