

# ***Supplementary Committee Agenda***



**Epping Forest  
District Council**

## ***Cabinet Monday 18th March 2024***

**Place:** Council Chamber, Civic Offices, High Street, Epping

**Time:** 7.00 pm

**Democratic Services:** V Messenger (Democratic Services)  
Tel: (01992) 564243

### **14. NORTH WEALD BASSETT STRATEGIC MASTERPLAN FRAMEWORK (Pages 2 - 30)**

(Place – Cllr N Bedford) To agree to formally endorse the North Weald Bassett Strategic Masterplan Framework (C-051-2023/24).

**Please see Appendix C (Statutory and Other Written Consultee Responses) attached.**

North Weald Bassett Strategic Masterplan Framework Consultation - Statutory and Other Bodies Responses		
Organisation	Comment	EFDC Response
Conservators of Epping Forest	Green space - The City of London as the Conservators of Epping Forest, believe that the Masterplan design of North Weald is mostly sound and that there are attempts to complete green links through the site, though it is felt that more could be done to widen the link between the site SANG and that of the 'social heart' of the site. The work to avoid rat runs is a sound part of the plan. The incorporation of the SANG and the existing natural greenspace is supported by the Conservators as positive.	Noted
Conservators of Epping Forest	Sustainable transport links Although the Conservators observe the public transport bus route from NW to Epping. They remain concerned that the 1050 will see a significant amount of vehicles travelling west to Epping via the A414 in order to access Epping Tube. The plan talks only of improved cycle infrastructure within the curtilage of the town. The Conservators feel that the transport link, similar to the Latton Priory Masterplan has been overlooked in the wider EFDC Local Plan and that this will impact the Forest.	The sustainable transport measures will continued to be reviewed to ensure a comprehensive approach is adopted
EFDC Environmental Health Team (Air Quality)	<p>Odour - As mentioned in my comments to planning already, the proposed site will be situated next to a sewage treatment facility which generates odour and will result in nuisance for the future occupants/users of the proposed site. Having reviewed the odour reports produced in 2012 by Resource and Environmental Consultants Ltd and in 2016 by Odournet, exceedances of the most common odour threshold criteria is expected over part of the site; approximately 10% of the proposed development area according to the Odournet report. The most recent report produced by Air Quality Consultants in support of planning application EPF/2587/23 concludes that the overall effect of odour on future users of the Proposed Development will be not significant. Having reviewed this report, I am not convinced of this conclusion. Additionally, the report did not model odour emissions opting to instead include the Odournet odour contours. None of the odour contours were overlaid on the proposed development to demonstrate where the future users would be situated in relation to the odour contours.</p> <p>I appreciate that the Masterplan includes a reference to the Odournet report and a contour map of the odour, however, this is misleading as the Odournet report actually produced various contour maps with slight but relevant differences.</p> <p>Environmental Health would have reservations recommending approval for a proposal that placed residential, primary school, a community hub, or retail units within the areas modelled to have odour concentrations of 1.5 ouE/m3, 3 ouE/m3, and 5 ouE/m3.</p> <p>Whilst I acknowledge that based on the case law, nuisance would not likely occur with concentrations below 3 ouE/m3, I am using a precautionary approach due to the reports not accounting for the possibility of the sewage treatment works increasing their capacity and/or expanding in future years. This caution also accounts for the hotter summer temperatures which we are likely to experience.</p>	This is a detailed matter for future planning applications where the SMF proposals have been informed by extensive odour modelling over a number of years and which has involved the owner of the WWTW. The overriding conclusions are the extent and severity of odour originating from the WWTW are limited in nature and severity.
EFDC Environmental Health Team (Air Quality)	<p>Correction - Page 92 refers to an Air Quality Impact Assessment. It should be air quality assessment. Additionally, the developer and or their consultant should contact Environmental Health to agree on a methodology for this report prior to producing one. Lastly in relation to this, such reports should be produced prior to planning consent being given.</p> <p>Additionally, there is reference in the same paragraph to the Air Pollution Mitigation Strategy. This is confusing to the reader as the paragraph is relating to impact on human health where as the mitigation strategy is in relation to the EFSAC.</p>	<p>Text updated to state "Air Quality Assessment"</p> <p>Text updated to say: "It is recommended that each developer / landowner appoints an air quality consultant to determine in consultation with EFDC's Environmental Health officer the impact of the proposed development on the surrounding air quality to ensure both current and future residents are not exposed to unacceptable pollution levels".</p>
Essex County Council	The North Weald Bassett Masterplan area sits in close proximity to the east of North Weald Airfield Masterplan area as identified in EFDC's Draft Local Plan under policy P6 with a site reference NWB.E4A. The policy allocates 10 hectares of employment land of B2 and B8 and research and development and light industrial (within Use Class E) us to the east of main runway. ECC wish to emphasise the point that the two Masterplan Areas for North Weald Airfield and North Weald Bassett should be considered together throughout all stages of the planning process in a co-ordinated, holistic approach to maximise interconnectivities and sustainable links within, and between the two sites and wider area.	Noted and proposed connections are identified within the SMF.
Essex County Council - Public Health & Wellbeing	<p>We refer to colleagues in the Public Health Team at Epping Forest District Council to provide a comprehensive feedback in relation to health on this Masterplan.</p> <p>We would highlight however, that a Health Impact Assessment (HIA) should be undertaken for this proposal to ensure that health and wellbeing is fully explored and should be undertaken at the earliest opportunity to help inform the overall early principles for the site. We therefore welcome that is suggested that a Health Impact Assessment (HIA) will be submitted as part of any planning application. We suggest however, that reference to the Essex Design Guide – Healthy Places Advice notes for planners, developers and designers (2019) (or as updated or superseded) and Sport England Active Design Principles should be made in the Masterplan document. As part of any HIA, It should be ensured that the wider determinants of health are factored into the process including socio-economic, lifestyle and other considerations. The level of evidence required as part of the HIA is relative to the scale and complexity of development proposed and HIA being implemented. Cumulative impacts of development also needs to be considered including consideration of healthcare services and facilities and social care. We would encourage early conversations with the relevant stakeholders on this especially NHS colleagues.</p>	The EFDC Local Plan sets out the requirements for Health Impact Assessments and it is listed in the SMF as a required planning document.

Essex County Council - Education	<p>ECC is the Lead Local Education Authority (including Early Years &amp; Child Care, primary, secondary, Special Education Needs, and Post 16 Education) for where this site is proposed.</p> <p>Under the Childcare Act 2006, Essex County Council (ECC) must ensure that there is sufficient high quality and accessible early years and childcare places within the local area. Furthermore, Under Section 14 of the 1996 Education Act, ECC has a statutory responsibility to secure sufficient school places to serve their area. The available schools must be sufficient in number, character and equipment to provide all pupils with the opportunity of an appropriate education.</p> <p>In understanding S106 infrastructure contributions likely required from this development, the Essex Developers Guide to Infrastructure Contributions should be referred to in first instance. From an education perspective, Early years and childcare, primary and secondary school, School Transport, SEND, and Post-16 contributions are likely contributions to be requested when a planning application(s) are submitted for any area included within the defined Masterplan. Land for a new primary school and Early years and Childcare facility will also be requested.</p>	The SMF identifies the need to provide early year and primary provision on the site and contribute to secondary education. The need for future planning applications to consider school transport, SEND and post-16 contributions is noted.
Essex County Council - Education	<p>It is ECC's position that the pedestrian square on the eastern boundary of the education site needs to be further south based on current layout. As currently shown, there is a road to the east which means the area could not be considered entirely traffic free. Whilst a visitor entrance could be included in this location, the pupil entrance and public square should be abut the south-east corner. That area is shown as traffic free, and the GC8 and GC9 pedestrian cycle routes intersect at that point.</p> <p>A secondary emergency and grounds maintenance entrance needs to be shown. This could potentially be via the public open space to the west of the education site.</p> <p>The precise 2.1ha education site boundary needs to be clarified but, for the avoidance of doubt, it cannot include any part of the public square or the hedgerows. The boundary must, however, abut the public highway at the point where vehicular access to the school is shown. A secure fence line around the site would need to be established.</p>	The masterplan has been developed to include a traffic free frontage to the school, including a plaza/square. This is located adjacent to a green link that runs to the social heart of the masterplan. Options are preserved for secondary emergency access provision. It is noted that the SMF is not intended as a detailed design document and there are a number of potential arrangements of the site and its access that can be further developed if taken forward.
Essex County Council - Education	Under 'Location of land reserved for the primary school / early years', it should be clearly stated that the school frontage will be entirely traffic free with pedestrian realm that does not abut roads or car parking. This should replace the reference only to avoiding 'primary streets in terms of the primary school frontage.'	SMF has been updated to reflect these comments.
Essex County Council - Education	<p>If an EYCC facility is proposed as part of the Local Centre, Appendix C – Education site Suitability Checklist and Appendix F Early Years &amp; Childcare Facility Specification of the Essex Developers' Guide should be referred to in terms of design requirements. A standalone EYCC facility as part of the local centre is ECC's initial preference subject to some key requirements but EYCC provision co-located with the primary school would also be considered acceptable. Key criteria in terms of stand-alone EYCC provision would be:</p> <ul style="list-style-type: none"> <li>• A site area of 0.13ha would be required to deliver a standalone setting</li> <li>• We would require an appropriately detailed Land Compliance Study is prepared for the standalone facilities to ensure that the location and setting is suitable for this use;</li> <li>• For safeguarding and health and safety reasons we recommend that provision should be in a single storey building, which is not overlooked, with suitable access to outdoor play space;</li> <li>• Location within a community building may be more complex to deliver for various reasons including safeguarding and flexibility of use. If this proposed at proposal progress, it is recommended that ECC are engaged in further discussions to review acceptability of any proposals.</li> <li>• Any facilities need to ensure that their provision meets the requirements set out within the Statutory framework for the early years foundation stage (EYFS Framework). Where ECC build the provision, we would ensure that all rooms that are used by children, have direct access to the outdoors as set out in the EYFS Framework.</li> <li>• Any standalone facility, like those on school sites, would need to deliver provision to accommodate demand 8am-6pm all year round;</li> <li>• All EYCC settings should be available in perpetuity for that use to ensure that suitable facilities can continue to meet demand across the lifetime of the development;</li> </ul>	The SMF has been updated to clarify that the school option land includes land for EYFS. Figure 8.1 has been updated to include reference to EYFS alongside the primary school.
Essex County Council - Education	<ul style="list-style-type: none"> <li>• The term 'reserve school site' should be avoided as it implies only primary school use and an options hierarchy. For clarity and consistency, the land should be referred to as an 'education site', as it may also include EY&amp;C and SEND provision, and the establishment of a primary school on that land should simply be referred to as 'the new primary school option'.</li> <li>• On figure 5.20, label '6' refers to a 'potential nature/wetland'. For the avoidance of doubt, no part of the education site can be subject to flooding and the development's drainage strategy needs to account for a new school / EY&amp;C facility, as SuDS and/or attenuation features would reduce the usable site area.</li> <li>• The education building(s) has yet to be designed, but is unlikely to take the form shown on fig 5.20. Some parts of the key are referred to as 'indicative' or 'potential' whereas others such as the school buildings are not. For consistency, none of the elements should be referred to in this way and instead the figure title at the bottom of the page should read 'indicative education site elements and layout'.</li> <li>• In terms of the buildings as part of the education site, ECC would wish to see separate buildings for the EYCC facility and primary school. The layout should be indicatively updated to show how this could be accommodated within the site area.</li> </ul>	Clarification - text in document does not state "reserve school site". Fig 8.1 refers to "NWB.R3 will reserve land for school site". Fig 6.20 wetland reference removed. Fig 6.20 title updated as requested. Illustrative education layout updated as part of masterplan updates. The identified school site offers flexibility for a number of different built forms to be delivered. No further change is therefore proposed.

Essex County Council - Education	<p>The residential element on the northern boundary of the education site may be best kept low density / two storey, to avoid any conflict due to overlooking, noise or light pollution. This may become more of an issue if any community use of the education site is expected. As the site develops and planning applications are submitted, an assessment should be made to ensure that these residential units bordering to the north are not subject to unacceptable light or noise levels and should be assessed against BS8233 for indoor and outdoor limits for residential dwellings and BS4142 for plant noise (if relevant). Should there be unacceptable noise levels or light levels, mitigation should be built in as part of the residential parcel.</p> <p>The school is referred to as 2 storeys (10m) whereas page 125 states 11m. We would suggest that the height of the school is removed for the purpose of this Masterplan and would be dependent on detailed designs at a later stage of the planning process.</p>	The parameter plans have been removed from the SMF and replaced with mandatory spatial principles. These provide height ranges for the residential plots but exclude the school plot.
Essex County Council - Education	Figure 6.6 shows a car / road between the education land frontage and new homes adjacent to GC9. This is unacceptable and conflicts with other sections of the document.	SMF has been updated to incorporate comment made.
Essex County Council - Education	Is not clear from Fig 6.9 whether a road is shown between the school and residential buildings. For avoidance of doubt, this area needs to be entirely traffic free (except for emergency vehicles) and this should be stated in the text and shown/labelled on the diagram. The public square in front of the proposed primary school would be required and not just a 'potential' element if the school entrance is located here.	SMF has been updated to incorporate comment made.
Essex County Council - Education	The education element should mention compliance with the ECC Developers' Guide to Infrastructure Contributions' 2023 (or as updated). In particular, the education site option periods must comply i.e. ten years. Pre-transfer site would be determined by the Land Compliance Study.	Text on p94 updated to add "Applicants should reference the ECC Developers' Guide to Infrastructure Contributions' 2023." Site option period for the school will be subject to agreement through the S106 negotiation process of a future planning application.
Essex County Council - Education	There should be reference to the Education Site Land Compliance Study rather than a 'ECC School Site Assessment' (to be submitted at outline planning application stage). The acceptability of a proposed education site can only be confirmed through a Land Compliance Study.	P138 text updated to state "Education Site Land Compliance Study"
Essex County Council - Education	Highway access to the education land is currently shown in the wrong location and needs to be updated accordingly.	SMF has been updated to incorporate comment made.
Essex County Council - Education	SEND provision - ECC has a statutory responsibility to plan for and deliver SEND facilities. In line with the Essex Developer's Guide (2023) contributions towards SEND provision can be requested on any developments over 1000 dwellings. Taken as a whole, the masterplan would meet this threshold and is therefore likely that contributions will be requested from each development as part of this masterplan as it comes forward	P94 of SMF states that "ECC has a statutory responsibility to plan for and deliver SEND facilities. This development could generate a need for some pupils who need SEND provision requirements but further details can be explored/reviewed as the development progresses." additional text added to state "ECC is responsible for this delivery."
Essex County Council - Education	Post 16 education - Further discussion will be required on post 16 education once full details of the planning proposals at the site are known.	No change required to SMF as this is planning application stage.
Essex County Council - Education	<p>The Education Act 1996, as amended by Part 6 of the Education and Inspections Act 2006, places a duty on Local Authorities to make suitable travel arrangements free of charge for eligible children as they consider necessary to facilitate their attendance at school. Walking distance is defined by S 444(5) of the Education Act 2006 at two miles for those aged under 8 and three miles for those who have attained the age of eight years. These distances are measured by the shortest available walking route.</p> <p>An 'available route' is one which a child, accompanied as necessary, may walk with reasonable safety to school. In excess of these distances ECC has to fund 'free' school transport. Where development is proposed in locations that may require ECC to provide school transport, developer contributions are sought to fund provision.</p> <p>Based on the above, it is likely that school transport contributions in line with the Essex Developers' Guide will be requested from developments included as part of the North Weald Bassett Masterplan area. A full assessment of primary and secondary school transport contributions will be conducted at planning application stage.</p>	The need for school transport contributions is not an SMF matter and is more appropriately addressed in the context of specific planning application proposals.
Essex County Council - Libraries	<p>There is currently an existing library in North Weald Bassett. EFDC'S IDP, however, highlighted the need for new community facilities including "551sqm of community, youth and library space".</p> <p>Given that the IDP specifically refers to a library service as part of the community facilities, ECC have an interest in potentially relocating the existing library service to the new development as part of the community facilities required at the site. ECC's preferred option however, would depend on a cost analysis of future library provision within North Weald Bassett and understanding any cost of relocation and renting in comparison to staying on current premises. It is assumed at this masterplan stage, that this information would not be readily available from the developer. Therefore, at this current stage we would therefore welcome if there was a reference included within the Masterplan to a potential library use as part of the community facilities within Section 5.6 under the heading 'Local Centre – community element quantum'.</p> <p>Further discussions can be initiated to highlight any design requirements for this use to be feasible within the site.</p>	Given that there are currently not firm plans to relocate the North Weald library and no obligation to provide a new library as part of local plan allocation, no change is proposed. The built form and component use of the local centre (community) is not fixed and so the option remains open to explore this opportunity.
Essex County Council - Highways and Transport	<p>In terms of highway &amp; transportation considerations, ECC would firstly like to highlight that the Masterplan for both North Weald Bassett must incorporate measures to reduce the need to travel, promote and encourage the use of sustainable methods of transportation and provide viable alternatives to private car use. Such measures should be planned in consultation with ECC as part of the Masterplan process. Any proposed measures should be underpinned by feasibility evidence that demonstrates the delivery of modal shift away from single occupancy private car use by way of sustainable travel measures. This requirement was incorporated into Policy P 6 of EFDC adopted Local Plan.</p> <p>It is considered that full Transport Assessments will be required for sites as part of the Masterplan area which would be fully assessed at planning application stage to fully understand highway and transportation implications and whether appropriate levels of modal shift are predicted to be achieved in line with Policy P6. We have a number of initial high-level comments however, on this masterplan in relation to such matters which are outlined below:</p>	Noted, the SMF highlights the need for future applications to be supported by Transport Assessments.

Essex County Council - Highways and Transport	In terms of access to the development site, the Masterplan in section 5.5 (p61) states: "Smaller vehicular access points will be located around the SMF ensuring that each development site has its own access opportunities, albeit the majority of traffic movements are expected to utilise the new roundabout" Access to the Masterplan area has been discussed in some detail as part of PPA discussions and it has been made clear that ECC and EFDC's position is to minimise accesses to the site. The masterplan area should be planned for holistically as one overall site and accesses to the site should be minimised. Therefore as part of the access strategy included within the Masterplan document, it should be made clear that all references to access highlight that the access strategy will be to minimise accesses to the masterplan area around the site.	It is agreed that detailed discussions have been held in relation to minimising the number of vehicular access points to the site. In response to these comments paragraph beginning "Smaller vehicular access points..." has been removed from text on p61, now pg80.
Essex County Council - Highways and Transport	It is considered by ECC that the location of the new retail centre adjacent to the A414 rather than near the centre of the development where the other community facilities are proposed would likely result in many new and existing residents of North Weald Bassett driving to the retail centre. It could also encourage wider movements from across the area. We would strongly advocate a more central location to enable a more walkable neighbourhood for the whole of the masterplan area and make it more easily accessible by sustainable methods of travel for existing residents of North Weald Bassett whom largely reside to the South of the development.	The location of the retail provision has been agreed based on commercial evidence outlined in a retail viability report undertaken by Vistry. Notwithstanding the SMF seeks to ensure a close link between the retail area and local centre and have also provided further more direct access from the local centre to the retail area. It is considered that the current masterplan provides a good balance of ensuring commercial viability of the local centre only a short walk from community uses within the social heart of the development.
Essex County Council - Highways and Transport	Further discussion is required around the linkages between North Weald Airfield and North Weald Bassett particularly around the future of Church Lane. Sustainable links between the two sites should be promoted and it is suggested that representatives from North Weald Airfield and North Weald Bassett are at a joint meeting to discuss linkages in more detail going forward.	Noted: at this point in time linkages have been drawn in the respective masterplans and once the future development of the airfield is clearer, EFDC will seek full coordination between projects.
Essex County Council - Highways and Transport	Any detailed discussions on design of junctions, car parking requirements and s106 requirements/s278 works would be undertaken at the planning application stage (or through pre-app) once further detailed design of the proposals at the site are available.	This comment is noted and it is agreed that these matters will be considered as part of future detailed planning applications. No change is required to the SMF at this stage.
Essex County Council - Highways and Transport	ECC do wish to highlight however, that it is likely that the combination of this Masterplan area and other developments as allocated in EFDC's local plan will need to contribute to/upgrade the M11 J7. It should be made clear therefore within this Masterplan document the likely requirement to contribute to any M1 J7 works and should be added as a line to Figure 7.1 Infrastructure Delivery table (p114). ECC suggest that ongoing discussions should be had with National Highways in relation to any requirements for upgrading J7 of the M11. All transport infrastructure requirements will be subject to a Transport Assessment Review and will be discussed in detail when a planning application(s) are submitted for any part of the masterplan area.	Figure 8.1 updated to include M11 Junction 7. Potential requirement to contribute towards M11 J7 upgrade works (alongside other developments within the district and neighbouring authorities). It is recommended that applicants should engage with National Highways and ECC in relation to any requirements for upgrading J7 of the M11. All transport infrastructure requirements will be subject to a Transport Assessment Review and will be discussed in detail when a planning application(s) are submitted for any part of the masterplan area. Responsibility for delivery: National Highways/ECC
Essex County Council - Highways and Transport	On P57, the Masterplan document refers to all new homes being within 500m of a bus stop or mobility hub – all new homes should all be within 400m Actual (not as the crow flies) distance of a bus stop pairing.	SMF has been updated and states on P89 that each property will be within 400m of a bus stop.
Essex County Council - Highways and Transport	On p70, there is reference to diverting/extending existing services to serve the development. It is ECC's current position that ECC would wish to plan and adapt service development to the site through the tendering process. In this way, it can be ensured that existing routes are not disadvantaged as a consequence of the new development and that overall the village receives an improved network providing a range of new and improved linkages to key attractor sites. Consequently, it is likely that a contribution per dwelling will be requested as part of s106 discussions at the planning application stage.	Figure 8.1 public transport mechanism text updated to state "S106 requiring owners to seek to enter into a bus service agreement to extend/facilitate new bus services into the site. If required, a capped financial contribution to help subsidise bus route for initial 5 years of service"
Essex County Council - Highways and Transport	Figure 7.1 suggests that only development parcels R1 & R3 would be expected to contribute towards the new bus network. It is ECC's view that all the developers as part of this masterplan overall site should contribute proportionally towards the services. As a point of clarity the table here also suggests that contributions would only be for 3 years – it is standard acceptance that services take at least 5 years to reach commercial viability and sites like this, which are more isolated in nature can take longer.	Figure 8.1 public transport mechanism text updated to state "S106 requiring owners to seek to enter into a bus service agreement to extend/facilitate new bus services into the site. If required, a capped financial contribution to help subsidise bus route for initial 5 years of service". All sites are expected to contribute to the provision of bus services. Figure 8.1 updated within the SMF.
Essex County Council - Highways and Transport	Figure 5.8 shows some proposed bus stop locations, however these are only located on one side of the road, whereas the intention maybe for the services through the development to operate 2 way. Therefore these should be indicatively shown.	As part of SMF updates, Fig 6.8 updated to show bus stops on both sides of the street, indicatively. A note is added to the plan to indicate that bus services will run two ways. The final location of bus stops will be determined through future detailed planning applications and/or reserved matters.
Essex County Council - Highways and Transport	A housing trajectory as well as phasing plan showing buses entering and utilising the roads intended for bus use should be provided to understand more clearly when the bus through route would be provided and whether any interim arrangements are proposed e.g. a turning facility. This is so that it can be assessed whether any interim proposals are acceptable if they are required.	This level of detail is more appropriate for the planning application process, whereby a plan could possibly be secured by Planning Condition/S106. As such, no change is proposed to the SMF.
Essex County Council - Highways and Transport	As highlighted earlier, further investigation and discussion are required between EFDC, ECC and the developer teams for both North Weald Bassett and North Weald Airfield to discuss sustainable linkages including public transport between the sites and further afield.	The provision of a link between the SMF and North Weald Airfield Masterplan Area is supported, but as this link would fall beyond the boundary of the SMF, it would be the responsibility of Third Party to deliver.

Essex County Council - Housing	<p>As part of the Masterplan, we would expect that housing accessibility standards are clearly set out with defined targets in terms of M4(2) and M4(3) housing. This is particularly pertinent given that this is a site with many landowners and will have separate planning applications. Without clearly set out targets, there is not an overall commitment or measure to compare against when considering accessibility as part of housing schemes in future applications at the site.</p> <p>In relation to housing mix, it is stated on page 83:          "All new homes should have regard to EFDC's local plan housing policies H1, H2 and development management policies. At Reserved Matters stage applications should take account of SHMAR housing need, current affordable housing need and any specialist housing need"          In the context set out earlier, we would expect a stronger statement than "have regard to" with instead a commitment to delivering the requirements in Policy H1 (Housing type and Mix) for Part M4(2) housing.</p>	The SMF is in accordance with adopted Local Plan and given process SMF follows, it can not introduce new policy requirements. Precise housing mix is to be determined as part of detailed applications.
Essex County Council - Housing	<p>We also suggest that the EFDC's document 'Assessment of need for housing and accommodation for older people in Epping Forest District to 2033' (dated December 2021), and EFDC Housing Register data are referenced and referred to as evidence for Part M(4)3 wheelchair housing. Such evidence suggests:</p> <ul style="list-style-type: none"> <li>• EFDC Housing register data shows that there are 42 applicants who require ground floor accommodation and 43 who require M4(3). To meet this need 5% of the affordable homes should be built to M4(3) standards. Based on 1050 homes built at the site, a 40% affordable housing contribution would equate to 420 homes. 5% of this would result in 21 homes being to M4(3) standard.</li> <li>• The requirement for M4(3) is outlined in the report 'Assessment of need for housing and accommodation for older people in Epping Forest District to 2033' where one of the conclusions states in relation to Housing for Older People:          'From previous Housing LIN research there is potential that up to 50% of this estimated need could be met through the provision of mainstream housing. This is housing that is designed for and accessible to older people even if it is not technically 'designated' for older people, for example housing that is 'care ready' and suited to ageing as distinct from 'retirement housing'. This will include mainstream housing to accessible and adaptable standards M4(2) and M4(3).</li> <li>• The need for M4(3) to be provided at the site is further supported by national research by Habinteg Housing (October 2022) which shows that someone joining a local authority waiting list for a new-build wheelchair-accessible home could have to wait up to 47 years to be rehoused.</li> </ul>	The SMF is in accordance with adopted Local Plan and given process SMF follows, it can not introduce new policy requirements. Precise housing mix is to be determined as part of detailed applications.
Essex County Council - Housing	<p>The Masterplan, at various stages make reference to the Essex Design Guide. On page 87, it is stated:          "All new homes should be designed to cater for all ages and a range of physical and mental abilities"          There is no reference to the latter part of that statement in the EDG which is:          " All dwellings should be designed to cater for all ages and a range of physical and mental abilities and should be capable of accommodating changes in circumstances over a lifetime".          For the avoidance of doubt we would welcome the inclusion of the whole statement.</p>	The Essex Design Guide will still be a material consideration in the assessment of future planning applications.
Essex County Council - Flood Risk & Drainage	On Page 60 under title of Overview of Proposed Drainage Strategy, the text should include "in accordance with Essex County Councils SuDS Design Guide"	This comment is noted. The text on Pg 79 updated to read: "in accordance with Essex County Councils SuDS Design Guide, where appropriate."
Essex County Council - Flood Risk & Drainage	On Page 61, paragraph two text should also include consideration to water re-use where possible. Communal buildings such as schools, community hubs and commercial buildings are good examples of where surface water recycling can be utilised. This can reduce the discharge of surface water and potentially guard against water scarcity in the future.	P80 text updated to include suggested "Consideration should be given to water re-use where possible and where appropriate "
Essex County Council - Minerals & Waste	<p>Minerals and waste - The MWPA requests a Mineral Supply Audit to aid in demonstrating compliance with the notion of sustainable development, circular economy principles and the application of Policy S4 of the adopted Minerals Local Plan 2014 (MLP) which requires, inter-alia, 'The application of procurement policies which promote sustainable design and construction in proposed development'.</p> <p>The MLP further notes that 'All developers have the potential to reduce over-ordering of construction materials and encourage more sustainable construction practices through their own procurement practices.' A Minerals Supply Audit would feed into, or be considered alongside, a Site Waste Management Plan which accords with the MLP principle of 'Encouraging the re-use and recycling of construction, demolition and excavation wastes on-site' (MLP, Para 3.41) to provide a materials balance for major developments. There is currently no set scope for a Mineral Supply Audit, but the framework in Appendix 1 has been submitted to the authority previously and could be modified to suit the project in question. Some approaches have included the commitment to sustainable procurement practices as well as demonstrating how recycling and re-use targets will contribute to a reduction in primary aggregate demand.</p>	This comment is acknowledged, but the requirement for a mineral supply audit is considered to be best addressed as part of future detailed applications. No changes are proposed to the SMF.

<p>Essex County Council - Minerals &amp; Waste</p>	<p>Site waste management plan - Paragraph 8 of the NPPF recognises the importance of “using natural resources prudently and minimising waste” to ensure the protection and enhancement of the natural environment and to achieve sustainable development. It also reiterates the need to mitigate and adapt to climate change and move towards a low carbon economy. An efficient and effective circular economy is important to achieving these objectives.</p> <p>Policy S4 of the Minerals Local Plan (2014) advocates reducing the use of mineral resources through reusing and recycling minerals generated as a result of development/ redevelopment. Not only does this reduce the need for mineral extraction, it also reduces the amount sent to landfill. Clause 4 specifically requires:</p> <p>“The maximum possible recovery of minerals from construction, demolition and excavation wastes produced at development or redevelopment sites. This will be promoted by on-site re-use/ recycling, or if not environmentally acceptable to do so, through re-use/ recycling at other nearby aggregate recycling facilities in proximity to the site.”</p> <p><i>It is vitally important that the best use is made of available resources. This is clearly set out in the NPPF and relevant development plan</i></p>	<p>This comment is acknowledged, but the requirement for a Site Waste Management Plan is considered to be best addressed as part of future detailed applications. No changes are proposed to the SMF.</p>
<p>Essex County Council - Minerals &amp; Waste</p>	<p>Site waste management plan - A SWMP would be expected to:</p> <ul style="list-style-type: none"> <li>• present a site wide approach to address the key issues associated with sustainable management of waste, throughout the stages of site clearance, design, construction and operation,</li> <li>• establish strategic forecasts in relation to expected waste arisings for construction,</li> <li>• include waste reduction/recycling/diversion targets, and monitor against these,</li> <li>• advise on how materials are to be managed efficiently and disposed of legally during the construction phase of development, including their segregation and the identification of available capacity across an appropriate study area.</li> </ul>	<p>This comment is noted and provides useful guidance to inform the preparation of Site Waste Management Plans at planning application stage.</p>
<p>Essex County Council - Climate Change</p>	<p>Climate change issues are key to the requirements for development within Essex to meet the Net Zero Targets proposed within the county by the ECAC. Furthermore, Epping Forest District Council declared a ‘climate emergency’ in 2019 and released the EFDC Sustainability Guidance &amp; Checklist for major developments adopted in March 2021.</p> <p>The Essex Climate Action Plan outlines the county’s target for Net Zero Development. All Consented new homes and commercial buildings are to be net zero by 2025.</p> <p>Outline Comments</p> <p>In the above context, we are welcoming that it is stated in section 5.1 that “The proposal will be designed to be highly energy efficient and gas free, with a fabric first approach, photovoltaics and EV charging within each home.”</p> <p>ECC recommends that at a minimum, mechanical ventilation and heat recovery (MVHR) systems should be provided in all homes to ensure a comfortable internal environment, and air source-heat pumps should be installed to provide low carbon electricity. The policy requirements for fabric efficiency and airtightness must be met.</p> <p>During the drafting phase, ECC was involved in discussions with the developer to outline the requirements for sustainable development in relation to climate change. The developer has outlined their direction to design to ‘Net Zero by 2030’ which aligns with the requirements as set out in the EFDC Sustainability Guidance, and as such at present, all requirements are to be met as a minimum. The requirements set out in the ECC Net Zero Policy in Operation sets out the standard of design and construction required to meet net zero standards now, and are the preferred route towards reducing the demand and lowering the carbon emission impact of the development.</p> <p>ECC welcomes the adoption of the nationally recognised energy hierarchy approach taken to ‘be lean’, ‘be clean’, ‘be green’ and ‘be seen’ which strongly aligns with the principles for our net zero in operation for new builds policy. This approach is echoed in the EFDC Sustainability Guidance and new developments should comply with these outlining principles.</p>	<p>As set out within the SMF, there is a commitment to achieve Net Zero by 2030. It is not considered appropriate within the SMF to detail the specific measures relating to on site energy generation or ventilation and heat recovery, given that different strategies could be acceptable, all of which accord with planning policy. This will be a matter for further consideration at detailed planning stage. It is important that any future applications are considered in relation to the planning policy requirements set out in the Local Plan.</p>

<p>Essex County Council - Climate Change</p>	<p>Energy strategies - The developer has identified photovoltaic (PV) panels will be provided on the dwellings of the Proposed Development. The Essex Solar Design Guide has been produced to provide detailed guidance on how this can be optimised.</p> <p>Please note, our aspiration for net zero development for the county would aim for 100% of the site's predicted energy usage to be balanced by on site generation. In accordance with the Net Zero in Operation Policy, the generation for the PV will be required to match or exceed the predicted annual energy use of the building, at a rate of 15kWh/yr/m2 of building footprint.</p> <p>This requires sufficient scrutiny taken on the lowering of demand primarily to levels as previously mentioned. The optimal view at this moment in time is to drive down the electricity demand as far as possible through the installation of energy efficient technology, and balance as far as practicable the usage. The Energy Use Intensity (EUI) of a building covers all energy uses (regulated and unregulated): space heating, domestic hot water, ventilation, lighting, cooking and plug-in loads e.g. appliances, computers etc. However, electricity used for electric vehicle charging is excluded from the calculation. Whether the energy is sourced from the electricity grid or from onsite renewables does not affect the calculation. Energy Use Intensity in all buildings of major development proposals should be demonstrated using predictive energy modelling.</p> <p>There may be circumstances where it is not technically possible to match on-site renewable energy generation with annual average energy demand. An offsetting mechanism is therefore provided to enable these developments achieve compliance with the policy linked above. The offset contribution will be used to fund additional renewable energy capacity elsewhere in the plan area or County. The aim is to make up for the shortfall in renewable energy that cannot be generated on-site. The offset mechanism is purposely limited in role and scope and is only intended for use as a last resort.</p>	<p>As set out within the SMF, there is a commitment to achieve Net Zero by 2030. It is not considered appropriate within the SMF to detail the specific measures relating to on site energy generation or ventilation and heat recovery. This will be a matter for further consideration at detailed planning stage. It is important that any future applications are considered in relation to the planning policy requirements set out in the Local Plan.</p>
<p>Essex County Council - Climate Change</p>	<p>Low carbon strategies - Whilst we welcome the proposed fabric first approach and proposed inclusion of renewable energy technologies onsite, the development proposals must be more ambitious in order to be considered to be achieving sustainability by reducing the carbon footprint of the development to align with ECC and the national target of net zero and the environmental objective of moving to a low carbon economy. It is essential to ensure that new developments are truly net zero in their operation, which is measured in terms of both carbon and energy, to keep the UK on track to meet its legally binding target of net zero by 2050 (as required by the Climate Change Act 2008).</p>	<p>The SMF provides a clear target to achieve Net Zero by 2030. The targets within the SMF already exceed the building regulations and planning policy requirements.</p>
<p>Essex County Council - Climate Change</p>	<p>Low carbon strategies - Strides must be taken to ensure dwellings include design features to minimise overheating risk, improve thermal comfort and increase energy efficiency. These include passive design features (for example glazing design, cross ventilation, and installation of mechanical ventilation). We recommend that at Design Stage, a detailed overheating assessment will be carried out to show compliance with Approved Document O: Overheating (2021). We recommend that considerations for form, orientation for daylighting and shading in relation to solar gains is optimised and balanced with solar PV gains to ensure an optimal solution for all dwellings on the development is achieved. Please review and consider the recommendations for shading applications made within the new design guide on shading for housing carried out by industry experts.</p> <p>The construction specification of every home in general will include high levels of insulation in the ground floor, external walls and roof spaces, lessening heat loss from the building envelope and lower the energy requirement of every home. The fabric efficiency of the proposed homes has been designed to reduce heat demand and energy needs in line with the policy requirements define in the report, with high levels of insulation and low air permeability.</p>	<p>Orientation of dwellings has been considered as part of the SMF process. The illustrative masterplan has been updated partly in response to this comment to maximise solar gain. At the next stage a Design Code for the site will be prepared which will provide further consideration in relation to orientation, daylighting and solar gains. The construction/materials for each dwelling will be considered fully at reserved matters stage/design code stage. Section 6.10 has also been added within the SMF to set out good sustainability design principles.</p>



Essex County Council - Climate Change	<p>Low carbon strategies - Reducing space heating demand to the target levels identified is necessary to achieve a net zero carbon (in operation) building and aligns with recommendations from the Climate Change Committee, Royal Institute of British Architects (RIBA), Low Energy Transformation Initiative (LETI) and the UK Green Building Council (UKGBC). It is also beneficial to residents and building users as it directly reduces energy costs.</p> <p>Our recommendations that developments will be required to be fossil fuel free have been strong, and we strongly support the approach that the Proposed Development will seek to supply energy efficiently by designing for the use of only electric based heating and hot water systems. This should include the use of Air Source Heat Pumps (ASHPs), which are highly efficient when designed into the space heating system. As identified in the Energy Strategy, ASHPs can feed either low temperature radiators or underfloor heating and therefore heating system options must be optimised to ensure low demand requirement to heat the spaces effectively and efficiently.</p> <p>ECC welcomes the circular economy and sustainable supply chain approaches set out as design commitments. It would be suitable to include an options study to identify key areas where circular economy principles can be adopted on the development. The key commitments to flexible/adaptable/replaceable systems, local material sourcing, avoiding composite material and non-deconstructable fixings; and specifying recycled, reused, or secondary content are significant for reducing the whole life carbon of the development and should be strongly adhered to throughout the design stage.</p> <p>The applicant should instruct as part of the requirements for the development that a Construction Environmental Management Plan (CEMP) be developed for each site to identify, communicate, and monitor environmental management during construction activities. All contractors, including supply chain subcontractors, must be required to adhere to strict waste minimisation and management processes. A Construction Phase Waste Management Plan should be developed alongside the CEMP to minimise waste during on site processes. For a development of this size, early connection to grid is crucial, to avoid unnecessary emissions caused by use of fossil fuels</p>	It is not considered appropriate within the SMF to detail the specific measures relating to on site energy generation. This will be a matter for further consideration at detailed planning stage. It is important that any future applications are considered in relation to the planning policy requirements set out in the Local Plan and Building Regulations. The requirement for a Construction Environmental Management Plan and circular economy statement is considered to be best addressed as part of future detailed applications. No changes are proposed to the SMF.
Essex County Council - Climate Change	Water efficiency - Essex is classified as a seriously water-stressed area. Our water companies predict that by 2050 we will only have 66% of the water we need available. All Local Plans in Essex require 110 litres per person per day (l/p/d) in new development, however the recently published DEFRA Plan for Water has considered mandating 100l/p/d in seriously water stressed areas such as Essex in the future. Any efforts in design to reduce the water usage of each dwelling will take significant strides to reducing overall demand of the development.	As noted above, text has been added to page 110 that "New homes to meet a water efficiency standard of 110 litres or less per person per day - developers should seek to reduce this where possible."
Essex County Council - Climate Change	<p>Climate change mitigation and adoption strategies - In order for the Net Zero Carbon Development (in operation) policy to be effective, it is important that new buildings deliver their intended performance. Using predictive energy modelling, such as Passivhaus Planning Package or the Chartered Institution of Building Services Engineers (CIBSE) TM54 (which is a requirement for major applications), will help improve accuracy of energy performance assessments and reduce the potential gap between the design and actual in-use energy. Also, excellent detailed design needs to be matched by high quality construction and commissioning in order for the 'energy performance gap' to be minimised. The information must be submitted at completion stage of a development (prior to occupation) to demonstrate to the satisfaction of the LPA that the building / development has been built to the approved.</p> <p>For residential development proposals of 100 dwellings or more, the Council recommends in-use energy monitoring to be undertaken on a representative sample of at least 10% of homes for a period of 5 years. The information must be evaluated to understand how buildings are performing, minimise the performance gap, and to aid the learning, innovation and skills development in the design and construction industry.</p>	These matters will be considered further as part of detailed applications and thereafter. No change is proposed to the SMF.
Essex County Council - Climate Change	<p>Climate change mitigation and adoption strategies - The use of BREEAM is encouraged to address key sustainability objectives and providing a level of independent quality assurance for development. It has been acknowledged that the development will look to target BREEAM Communities carbon embodied targets. This will require energy strategy to be written for the proposed development by an energy specialist as per credit RE-01, with the developer committing to implementing recommendations in the energy strategy that will result in a reduction in carbon dioxide emissions associated with baseline energy demand. The credit aims to recognise and encourage developments designed to minimise operational energy demand, consumption and carbon dioxide emissions. Implementation of the recommendations made throughout these comments relating to climate change, and aligning with the Net Zero in Operation policy in the energy strategy for the development will maximise the opportunity for reducing carbon emissions.</p> <p>ECC is committed to promote all new housing developments to be built to net zero standards by 2025; That means, serious steps must be made towards that target now for all new consented developments. The evidence base towards the technically feasible and financially viable development of Net Zero in Operation for new homes is available on the Essex Design Guide Website   Net Zero Evidence webpage. Please also note the Planning Policy Position for Net Zero in Operation found here and is summarised in Appendix 2.</p> <p>Policy N22 introduces a requirement to assess embodied carbon emissions for all new build developments (residential and non-residential) over the threshold identified. The assessment and reporting of embodied carbon for the purposes of compliance with Policy N22 should follow a nationally recognised methodology. In the absence of an approved UK national methodology, the RICS Professional Statement on Whole Life Carbon Assessment (WLC) is the accepted industry methodology for WLC assessments (EAC Report, Para 70) and should be used for demonstrating policy compliance. Further guidance and software tools have also been developed, such as One Click LCA.</p>	As set out within the SMF, there is a commitment to achieve Net Zero by 2030. This will be a matter for further consideration at detailed planning stage. It is important that any future applications are considered in relation to the planning policy requirements set out in the adopted Local Plan and Building Regulations.

<p>Essex County Council - Climate Change</p>	<p>Climate change mitigation and adoption strategies - Total embodied carbon emissions are the greenhouse gas emissions resulting from the materials and construction processes through the whole life cycle of a building, including the demolition and disposal (RIBA stages A1-5, B1-5 and C1-4). Upfront embodied emissions are the portion of total emissions associated with the Building Life Cycle stages A1 – A5 and include the following elements: substructure, superstructure, façade and roof, Mechanical Electrical &amp; Plumbing (MEP) &amp; internal finishes.</p> <p>As part of pre-app discussions, ECC set out expectations for embodied carbon targets to be set out for the development and included within the Masterplan. It is imperative that embodied carbon for the development should be calculated and reduced to the lowest possible value for all aspects of the proposal. ECC recommends that the targets set out in policy NZ2 are adopted for the development going forward.</p>	<p>These matters relating to embodied carbon will be considered as part of future detailed planning applications. No change is required to the SMF at this stage.</p>
<p>Essex County Council - Employment &amp; Skills</p>	<p>Employment - Part 8 of the draft Masterplan sets out the planning application requirements. The list we recommend should include an Economic Strategy. An Economic Strategy that maximises on-site job creation alongside sustainable access to employment opportunities in neighbouring major employment centres and strategic employment sites will establish how the development may become more sustainable, ensuring that housing and employment growth is aligned. As transport is one of the largest environmental impacts, and commuting makes up a significant portion of trips, a more detailed assessment of employment need/ demand/ opportunity is required across the relevant Functional Economic Market Area. Local employment opportunities and travel patterns must be explored, and a realistic daily commute zone established to enable impacts to be assessed. This will also inform the Transport Assessment.</p>	<p>"Socio-economic effects" added as a bullet point to p138</p> <p>Agreed that this is a key consideration and will be addressed in documents such as the Planning Statement and Environmental Statement, to be submitted with future planning applications (where necessary).</p>
<p>Essex County Council - Employment &amp; Skills</p>	<p>Employment - There is around 0.9ha of existing employment use in the centre of the development site at "Chase Farm Units" that appears to be lost through this development. ECC and EFDC aim to protect and nurture SMEs including ensuring there is sufficient supply of employment premises. Whilst 10ha of new land is proposed for general commercial/industrial development on the airfield site at NWB.E4a, the markets for "new employment land" and "renting/buying small premises" is different so it cannot be assumed that the displaced businesses will simply relocate to NWB.E4a site on the airfield. Therefore the below recommendations are provided by ECC to be considered as part of the Masterplan and overall vision for North Weald Bassett:</p> <ul style="list-style-type: none"> <li>- Incorporate the Chase Farm Units into the Social Heart, potentially having been relocated/refurbished eg through S106 contributions, or</li> <li>- If the units are to be lost,</li> </ul> <p>* the phasing of the Masterplan should allow for Chase Farm Units to remain in use as long as possible to allow time for occupiers to relocate, and</p> <p>* EFDC in its unique position as being landowner and local planning authority for site NWB.E4a, should seek replacement provision of the units on this site.</p> <p>On page 83 of the Masterplan it states: "There is potential for future proposals to feature a diverse range of dwelling types, including homes with integrated space for home working". To reflect trends towards increased homeworking enabled by technology and hybrid working practice (as identified in chapter 4.4), this text could be strengthened to require all homes to facilitate home working. A "touchdown" facility providing business services not available at home (e.g. meeting rooms and printing facilities) may also be incorporated into the proposed local centre.</p> <p>The Key Principles on page 87 state "All new developments should be well connected to digital infrastructure". In order to facilitate economic growth and promote social wellbeing through digital inclusivity, early engagement with providers will ensure the proposed development is future-proofed in digital connectivity for all homes and businesses. This could be delivered via fixed line gigabit-cable broadband and/or 5G connectivity, available from the outset.</p> <p>Please also see section on Broadband Connectivity found as a later section within this letter.</p>	<p>The Chase Farm Units site NWB.R4 is allocated for residential development as part of the adopted Local Plan and therefore this loss has already been considered. The Chase Farm site is within separate landownership to other parts of the masterplan and may therefore form a later phase of development. 10ha of new employment development is proposed at North Weald Airfield. There are a number of employment areas around North Weald where businesses could relocate.</p> <p>The proposed Social Heart contains a flexible use community space which could include touchdown facilities subject to the final design and end user being decided. Home working opportunities will be considered in future design code and detailed design development.</p>
<p>Essex County Council - Employment &amp; Skills</p>	<p>Social Heart - Policy P6 M(ii) requires "a local centre including, retail, community, and appropriate provision of health facilities". There is 675sqm of proposed retail/commercial floorspace. A typical small supermarket/convenience store measures 280sqm 21 (3,000sqft), and a typical shop unit of 93sqm (1,000sqft), so the site could provide about 4 typical parade-type units and a convenience store. The population of NWB is 4,321 (Census 2021). The Masterplan identifies around 1800sqm of existing retail/commercial space elsewhere in NWB, which equates to 0.42sqm/person. With 1050 new households at the Essex average of 2.4 people per household, the additional population of this site would be approximately 2,520. Given the buoyancy of the local commercial market (low shop vacancy), the same floorspace/population ratio would equate to some 1,058sqm of new retail/commercial floorspace. This could be expressed as about 8 typical parade-type units and a convenience store. ECC suggest this would offer more opportunity for small businesses that complement the new community and build critical mass, such as café, hairdresser, takeaway etc.</p> <p>As a minimum however, EFDC should check and be satisfied that the amount of community/retail uses proposed is in line with the site requirements as outlined in the latest Infrastructure Delivery Plan.</p> <p>The proposed retail and community facilities are split across two sites, separated by an estimated 150m of residential use. Spatially therefore, the proposal does not appear to deliver a "critical mass" to create a local centre. To mitigate this, we recommend that rather than using design measures as set out on page 74, the commercial and community uses could be co-located together with additional space for further facilities (e.g. a play area, more retail/commercial space with a variety of unit sizes, a "touchdown" business facility to support home workers, community and other services etc). This we suggest would help to generate the critical mass to deliver a successful Social Heart.</p>	<p>The SMF is in compliance with the IDP. It is considered that the current masterplan provides a good balance of ensuring commercial viability of the local centre, providing a suitable level of local services but also being complimentary to the existing North Weald village centre.</p>

Essex County Council - Employment & Skills	<p>Delivery of community and commercial uses - The masterplan sets out a suggested delivery plan in chapter 7. Fig 7.1 - Infrastructure delivery table sets out the proposed conditions around delivery of community and commercial uses.</p> <p>These are considered too short a period as commercial development does not take place as quickly as residential development. An operator is unlikely to develop the shop unit itself, instead it would normally rent a completed unit. In order to ensure the business is viable, there must be critical mass of customers before an operator is likely to consider opening. Similarly, and notwithstanding S106 funding for construction, a doctor/dentist and community facilities are not certain to be developed within 2 years. It is more realistic to tie these elements to the full development construction timeframe – such as marketing that begins on the granting of planning permission and extends 3 years post occupation of the last home, or until sold/let. This we recommend will give more realistic commercial timeframes and secure delivery of the amenities and achieve the Social Heart ambition established in the Masterplan.</p>	The infrastructure delivery schedule at Figure 8.1 has been updated to exclude matters that will be subject to further detailed discussion in relation to a planning application.
Essex County Council - Employment & Skills	<p>Access to NWB Airfield employment area - The footpath/cycle access to NWB airfield (point 14 on the proposed masterplan) is welcome. However, we suggest that it must be surfaced, well-lit, and be direct in order for it to be perceived as a safe choice for employees, particularly after dark, as this has direct effects on attracting and retaining a diverse workforce. As a viable alternative to the car, it may then have positive benefits such as supporting businesses having appropriate operating hours / shift working, etc. Accordingly, the footpath/cycle access to NWB airfield (point 14 on the proposed masterplan) we recommend should be explicitly mentioned and conditioned/obligated in Figure 7.1 Infrastructure Delivery Table, to be delivered early in phasing.</p>	NWB Airfield and any link between it and the SMF site is located outside the SMF masterplan area, in an area of ecological importance, future lighting will therefore need to be considered sensitively.
Essex County Council - Employment & Skills	<p>Employment and skills - ECC suggest that an employment and skills strategy should be required once the Masterplan develops and is included as part of the planning application(s) at the development site. An Employment and Skills Strategy should therefore be listed as a supporting document on p118.</p>	The SMF has been updated to include this.
Essex County Council - Green Infrastructure	<p>Green infrastructure - ECC GI position - Having reviewed the North Weald Bassett Strategic Masterplan Framework, we would advise the following recommendations are considered for enhancements to the scheme that would improve the Green Infrastructure (GI) network and help achieve net environmental gains.</p> <p>The ECC GI Teams' responses to the Consultation Feedback Form are as follows.</p> <p>1. Vision</p> <p>1a&amp;b Do you generally agree with the masterplan vision?</p> <p>ECC GI Team welcomes that the masterplan will be landscaped- led influenced by the existing landscape features and GI which both is core to its vision delivery, Supported by the SMF Framework layer (section 5.4). We support the vision for each home to be within 150m of a major green space corridor, with over 17ha of attractive landscape and open space, the enhancements to the Memorial Playing Fields to be a focal point, active travel routes and provision of play spaces for all ages and abilities. GI should be considered and prioritised throughout the planning process to ensure it is effectively designed and integral to the whole development from the outset.</p> <p>The Masterplan must balance the needs of people and improving nature through habitats and biodiversity net gains, that forms an important component of nature recovery and GI networks, providing an opportunity to show case the development as best practice. The vision needs to include a reference to nature.</p> <p>It is noted in section 3 that Ecological baseline data survey and desktop habitat studies have been used to inform the Masterplan Framework. Moving forward, we recommend that the Preliminary Ecological Assessment/ GI Audit are utilised to outline the existing site GI in inform design. The identified existing GI needs to be incorporated as a part of the design where possible with strongly worded commitments made for the retention of features. Where the removal of high value GI is unavoidable, a suitable location will need to be identified for the GI to be replacement to an equal or enhanced standard.</p>	The SMF have been informed by an extensive evidence base. The reserved details will be considered further as part of future applications, supported by further evidence and informed by the Council's studies as necessary. No changes are proposed to the SMF at this stage.

Essex County Council - Green Infrastructure	<p>2 Themes - The proposed vision is structured by the following themes and principles. To what extent do you agree with each principle? Agree or Disagree (5 to 1)</p> <p>Landscape &amp; Topography</p> <p>2a Utilise and enhance the existing landscape structure.</p> <p>ECCs GI Team considers that all major and strategic development sites should be designed around green and blue infrastructure to inform and shape the development. Particularly within denser developments, green infrastructure and open space should be approached from a multifunctional perspective, combining uses such as sustainable drainage, public open space, green corridors/ walking and cycling routes shading through street trees and biodiversity conservation to combine functional uses with amenity benefits. These features should be strategically located to provide green infrastructure and landscaping in prominent spaces to maximise the benefits and connectivity to site users and increase the usability of multifunctional space.</p> <p>2b Capitalise on the site's topography to employ sustainable drainage systems and open spaces.</p> <p>Surface water runoff can be managed using GI. More information on the benefits of naturalised SUDs is required, as is the incorporation of SUDs as aesthetic and accessible features within the GI of all developments. Naturalised SUDs provide people with a high-quality environment by providing amenity value, opportunities for environmental education, safe surface water management systems, and improved ecological connectivity.</p> <p>2c Incorporate a natural green space in the south west corner of the site.</p> <p>ECC GI Team welcomes the proposal of a natural green space in the south west corner of the site, adjacent to the Nature Reserve and the proposed EFDC SANG, as long as there is a network of other green spaces weaved across the site and is accessible to all. The SMF is proposing to include smaller areas of greenspace throughout the new neighbourhood. The interconnectivity of natural environment, flood protection and water management, outdoor sport and open space, and public realm is an important part of the GBI network and shouldn't be seen or treated in silo. In line with the EFDC's Green and Blue Infrastructure Strategy, all open spaces should be multifunctional. Multifunctional spaces bring a wider spectrum of environmental, social and economic benefits to urban areas, especially for small areas of open spaces and are more cost-effective way of addressing many social, wellbeing, drainage, and other</p>	The SMF have been informed by an extensive evidence base. The reserved details will be considered further as part of future applications, supported by further evidence and informed by the Council's studies as necessary. No changes are proposed to the SMF at this stage.
Essex County Council - Green Infrastructure	<p>Open spaces and focal point -</p> <p>2d Create a focal hub for the village at the Memorial Playing Fields</p> <p>ECC GI Team supports the enhancements of existing GI assets, ensures that green space is accessible to all, enhances biodiversity (both through the delivery of new habitats and wildlife corridors) and improves the character and sense of place. We welcome the co-location of sports, recreation, play, education and new community facilities with the Memorial Playing Fields. Multifunctional spaces bring a wider spectrum of environmental, social and economic benefits to urban areas.</p> <p>ECCs GI team welcomes protecting culture, heritage and developing a community spirit through the delivery of the GI. Whilst GI provides environmental and economic benefits, it also delivers social benefits via, physical and mental health and wellbeing improvement, social inclusivity through the provision of space for social interaction and public gatherings and, the improvement of community identity through the development of a sense of place. To ensure the community is key in GI delivery, early and continued engagement with key stakeholders and community groups should be undertaken to ensure the landscape-led approach outlined in the SMF reflects the needs and wants of residents.</p> <p>The SMF also mentions that St Andrews School will be incorporated as part of the open space and focal point, and that there is also the possibility of constructing a new 2fe primary school on the southwest corner of NWB.R3 (Page 75). ECC welcomes the proposal to include play areas, outdoor teaching and food growing areas. We would expect the school playing field are designed to ensure multi-purpose and functional use and not just concrete grounds or sport field. Such green spaces can contribute to the curriculum, for example PE, science, English, maths, outdoor learning and forest schools. In 2021, the Department for Education announced a new initiative designed to put climate change at the heart of education, young people will be empowered to take action on the environment. By 2023, teachers will have access to a model science curriculum designed to teach children about nature and their impact on the world. In addition, children will be encouraged to get involved in the natural world by schools enhancing their school</p>	These comments are welcomed. The reserved details will be considered further as part of future applications and supported by further evidence and informed by the Council's studies as necessary. No changes are proposed to the SMF at this stage. It is the intention that the land for the new primary school will be transferred to Essex County Council as part of the Section 106 agreement. Essex County Council will then be the lead promoter and responsible for the submission of a Regulation 3 application for the school, with the ability to provide multi-functional and multi-purpose spaces.
Essex County Council - Green Infrastructure	<p>2e Ensure each new home is within 150m of a greenway or area of open space.</p> <p>The National Green Infrastructure Framework S2-Accessible Greenspace Standard (previously known as Accessible Natural Green Space Standard (ANGSts)) can support the SMF in ensuring that everyone has access to good quality green and blue spaces close to home (within fifteen minutes' walk) for health and wellbeing and contact with nature.</p> <p>The Essex Design guide also provides guidance on walkable neighbourhoods where new neighbourhoods and streets are designed to promote the use of walking, cycling and sustainable transport. These places are planned to reduce the need to travel and include a mix of uses, green spaces and facilities to support the new development (within 15 – 120 minutes walking distance).</p> <p><a href="https://www.essexdesignguide.co.uk/overarching-themes/garden-communities/walkable-neighbourhoods/">https://www.essexdesignguide.co.uk/overarching-themes/garden-communities/walkable-neighbourhoods/</a></p>	These principles have been included in the SMF.

<p>Essex County Council - Green Infrastructure</p>	<p>2g Create a social neighbourhood with excellent walking and cycling links. Exploring connectivity here is critical for any proposed development. The SMF and any accompanying strategies and plans must balance the needs of improving nature through habitats and biodiversity net gains, but also finding a balance with access networks for recreational and active travel, by connecting already-existing routes and establishing new paths, cycle, and bridleways. Therefore, ECCs GI team recommends that the SMF design explores the potential for optimising active travel routes, particularly through GI assets. We also support and encourage opportunities to enhance and establish GI along sustainable transport and PRoW networks to both encourage active travel and create a green corridor for wildlife. This could include, but not be limited to, the integration of nature focused SuDS; native hedgerows, tree and shrub planting; incidental 'play on the way' features / trails; informal sport (outdoor gym/fitness trails); and areas for seating to stop and rest.</p> <p>2h Prioritise health and well-being through access to natural and built environment. When delivered correctly, GI will be multifunctional and positively impact on health and wellbeing for all. Access to good quality GI can encourage more active lifestyles, and there is a clear association between psychological health, mental wellbeing, and physical activity. A Health Impact Assessment will help to assess if the GI provision meets the diversity of user groups, whose needs may vary according to age, abilities, interest, or cultural beliefs. The Essex Green Infrastructure Standards (2022) should be consulted and includes technical guidance on delivery of GI as well as best practice case studies.</p> <p>2i Improve the flood and climate resilience, thermal and water efficiency. ECCs GI Team anticipate that flood risk management would have a key role in providing green and blue infrastructure corridors throughout the SMF area, in particular, linking areas of habitat across the boundaries of adjacent administrative areas. Please see our response above for 2b in regard to nature based solutions for SuDs</p> <p>ECC are in the process of developing the Essex Water Strategy. Moving forward, this emerging study, will have the potential to influence and support the direction taken in regard to water conservation. ECC as Lead Local Flood Authority would assess the acceptability of any surface water drainage scheme at the planning application stage.</p>	<p>These principles have been included in the SMF.</p>
<p>Essex County Council - Green Infrastructure</p>	<p>Integration and legible urban form -</p> <p>2j Integrate the proposal within the wider village by connecting social infrastructure.</p> <p>Every effort needs to be made to ensure that connections between green spaces, local amenities and developments are achieved to ensure that routes make sustainable connections and are attractive through the delivery of GI for the benefit of the new community and existing communities.</p> <p>2k Create attractive and well-designed new homes.</p> <p>Home design should support the delivery of Sustainable Development in line with the NPPF.</p> <p>2l Incorporate waypoints and key marker buildings and spaces to help residents and visitors navigate the new neighbourhood.</p> <p>GI and urban greening can contribute to people's health and wellbeing, as well as healthy aging through the design of the streets, building forms, way finders and other landmarks and details that can aid orientation, for example those living with dementia.</p>	<p>The SMF has identified the local connections that are possible between the SMF and surrounding area. Details of wayfinding can be considered as part of future detailed applications. No change is therefore proposed to the SMF.</p>
<p>Essex County Council - Green Infrastructure</p>	<p>In principle there are not objections from a GI perspective, as long as the recommendations for a landscape led design and GBI proposed in the SMF are delivered through strongly worded and commitments to positive action and GI enhancement and protection. We recommend that words like 'should', 'consider', 'where possible' should be removed, as it weakens the requirement to deliver multifunctional green and blue infrastructure and risks being trumped by other infrastructure requirements expressed as 'must', 'required' or 'expected'. ECCs GI team expects GI to be at the heart of the decision making at every stage in the planning process. GI should be considered at the earliest stage in the planning process and is expected to be incorporated into design guides and masterplans.</p>	<p>No change required to SMF</p> <p>The SMF contains a number of mandatory spatial principles and will meet the mandatory provisions set out within the Development Plan. It is important that some flexibility is maintained as the detail of the reserved matters come forward</p>
<p>Essex County Council - Green Infrastructure</p>	<p>1. Introduction - 1.5 Page 8</p> <p>Green and Blue Infrastructure should be added to the glossary of key terms. For example: Green and Blue Infrastructure (GBI) is a strategically planned network comprising all of our most valuable green (land based) and water (blue) spaces and features, both natural and seminatural features and habitat types, both within urban and rural that when connected, deliver quality of life and environmental benefits for communities and the nature.</p>	<p>Updated as suggested to Glossary p8</p>

Essex County Council - Green Infrastructure	<p>2. Planning policy and guidance</p> <p>2.1 page 10</p> <p>We recommend that the Epping Forest Green Infrastructure Study is referenced, consulted and utilised whilst considering landscaping and ecology.</p> <p>2.2 National Guidance page 11</p> <p>The National Green Infrastructure Framework should be referenced and utilised in support of the National Design Guide. The Green Infrastructure Framework is a commitment in the Government's 25 Year Environment Plan. It supports the greening of our towns and cities and connections with the surrounding landscape as part of the Nature Recovery Network. The GI Framework will help meet requirements in the National Planning Policy Framework to consider a GI and landscape-led approach. It's Green Infrastructure Planning and Design Guide provides an evidence based practical guidance on how to plan and design good GI and it complements the National Model Design Code and National Design Guide.</p> <p><a href="https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx">https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx</a></p>	p10 2.1 Text added to clarify this summary relates to Local Plan only. In addition, new text added stating "There are a number of other EFDC and ECC policy documents and guidance not summarised in this SMF which should be consulted alongside this document." 2.2 reference to The National Green Infrastructure Framework added on p11 under Nature
Essex County Council - Green Infrastructure	<p>2.3 Other Guidance</p> <p>Consideration should be given to the use of the Essex Green Infrastructure Strategy (2020) and Essex Green Infrastructure Standards (2022) in securing multifunctional GI. These documents champion for the enhancement, protection, and creation of an inclusive and integrated network of green spaces. Applying Essex's nine GI principles will help to ensure quality and consistency in the provision, management, and stewardship of GI an essential part of place-making and place-keeping for the benefit of people and wildlife.</p> <p>Essex has now established a Local Nature Partnership (LNP). The LNP contains four working groups – a Community Engagement group,</p>	Reference to Essex Green Infrastructure Strategy (2020) and Essex Green Infrastructure Standards (2022) added to p11 under Nature
Essex County Council - Green Infrastructure	<p>5.10 Sustainable Principles</p> <p>The ECC's GI team supports a strategy that seeks to maximise opportunities for habitat retention and sustainable design for nature and biodiversity and welcomes the fact that masterplans should look to design networks of green infrastructure that allow for recreation, biodiversity enhancements and protection, and place making. To ensure the integration of nature into development, ECC's GI team recommends that sustainable design be explored, including: -</p> <ul style="list-style-type: none"> <li>• Green Roofs/Walls: The provision of these features allow ecosystems to function and deliver their services by connecting urban, peri-urban and rural areas. Alongside biodiversity habitat creation, green roofs and walls can provide water storage capacity, flood alleviation and energy saving potential. In addition to buildings, these features can be provided on sustainable transport infrastructure (such as on bus stop/ cycle storage facilities).</li> <li>* Wildlife Bricks: The provision of wildlife bricks creates habitats for invertebrates.</li> <li>• Dual street furniture/seating (i.e., a bench including a planter): The design of the street furniture and bin stores can contribute to the landscape character, reduce clutter of an area or street and act as a green corridor/link to the wider landscape scale GI network.</li> </ul>	In this regard a new section 6.10 has been provided within the document that relates to sustainable design. It is considered that specific detailed sustainable design measures is a matter to consider further as part of the design code stage.
Essex County Council - Green Infrastructure	<p>It is positive to see that play will be at the forefront of public realm and GI to encourage children to interact. ECC recommends that the description of 'Children's playing space' (page 57) and 'Play Provision' (page 59) should include the provision of and opportunity for natural play. Children's engagement with a natural play space, outdoor learning and forest school areas, has a multitude of positive impacts on their learning and physical and emotional wellbeing. Studies have found that connecting children with nature and green spaces benefits their intellectual, emotional, social and physical development, giving them the best possible start in life and improving employability.</p> <p>It is expected play strategies to be formed by the character and function of the green spaces. It should be imaginatively designed and contoured using landforms, level changes and water, as well as natural materials such as logs or boulders, which create an attractive setting for play.</p>	Natural play referenced within SMF on p66/68, text on p79 updated to include "Opportunities should be sought to include provision of natural play areas incorporated within the SANG."

<p>Essex County Council - Green Infrastructure</p>	<p>It is welcomed that the EFDC sustainability guidance checklist aspirations on page 91, as well as the requirement as part of the planning condition on page 118, that the Biodiversity Metric be used, as well as the completion of a Biodiversity Net Gain Assessment and submission of a Biodiversity Strategy, are included.</p> <p>In order to comply with the Environment Act 2021 BNG legislation, the SMF will need to drive for a minimum 10% increase in both Habitat Units and Linear Units. It is recommended to go above and beyond this, aiming for at least a 20% net gain.</p> <p>Further Notes on BNG</p> <p>Mandatory biodiversity net gain will become law including the following key components:</p> <ul style="list-style-type: none"> <li>• Minimum 10% gain required calculated using Biodiversity Metric and approval of net gain plan.</li> <li>• Habitat secured for at least 30 years via obligations/ conservation covenant and condition for a Biodiversity Net Gain Management and Maintenance Plan</li> <li>• Habitat can be delivered on-site, off-site or via statutory biodiversity credits.</li> <li>• There will be a national register for net gain delivery sites.</li> <li>• The mitigation hierarchy still applies of avoidance, mitigation and compensation for biodiversity loss.</li> <li>• Will also apply to Nationally Significant Infrastructure Projects (NSIPs)</li> <li>• Does not apply to marine development.</li> <li>• Does not change existing legal environmental and wildlife protections.</li> </ul> <p>The following guidance has already been produced to assist the calculation and delivery of biodiversity net gain:</p> <ul style="list-style-type: none"> <li>• an updated Biodiversity Metric 4.0 was published.</li> <li>• CIEEM, IEMA and CIRIA have set out Good Practice Principles for Development and an associated Practical Guide and Case Studies.</li> <li>• a British Standard on biodiversity net gain and development projects: BS 8683:2021 Process for designing and implementing Biodiversity Net Gain</li> </ul> <p>The delivery of BNG is expected to take place on-site where possible, via the protection and retention of existing GI and provision of new features. However, it is recognised that this might not always be conceivable, and that off-site delivery could provide additional benefits and be used to protect areas of land that are of local natural and wildlife value.</p>	<p>There is no policy justification, both locally and nationally, to achieve 20% BNG on this site. How BNG will be secured is not an SMF issue and is to be addressed through planning applications. No change therefore proposed to SMF in relation to these comments.</p>
<p>Essex County Council - Green Infrastructure</p>	<p>ECCs GI team supports the requirement under Supporting Documents [in section 8.0] for the submission of a Landscape Strategy and GI Plan. We recommend the Landscape and GI Strategy is based on the Essex Green Infrastructure Strategy and GI Standards, as well as the Epping Forest DC GI Strategy, and National GI Framework to provide a more detailed an assessment of the ecological context of the development. The scheme should include but not be limited to:</p> <ul style="list-style-type: none"> <li>• The development should be designed to deliver Biodiversity Net Gain and wider environmental net gains, that forms an important component of nature recovery networks and the wider landscape scale GI network.</li> <li>• Demonstrate that the development site/setting has been reviewed for multiple functions and benefits (listed in the Essex GI Strategy (chapter 5.1, page 35) and ensure that green/open spaces are designed to ensure multi- purpose and functional use.</li> <li>• Travel Infrastructure should give consideration to use of GI features to ensure accessibility across the site.</li> <li>• Ensure there are good accessible links for all from the development to existing settlements, urban centres, rural areas, active travel networks and green spaces.</li> <li>• Demonstrate how the GI has been designed to provide recreational facilities for different user and age groups. It should deliver social inclusive processes that are open to all and incorporate the knowledge and needs of diverse parties.</li> </ul>	<p>The masterplan has been heavily informed by a landscape led approach and the need to support green infrastructure, biodiversity net gains and protect existing hedgerows and landscape features within the masterplan.</p>
<p>Essex County Council - Green Infrastructure</p>	<p>It is recommended as reserved matters/condition to Include a Construction Environment Master Plan.</p> <p>The ECC GI Team notes that the NWB Masterplan provided no detail on how existing GI assets will be protected during the construction phase. We recommend that no development shall take place until there has been submitted to and approved, in writing, by the Local Planning Authority a Construction Environmental Management Plan (CEMP). Ideally, strategic elements of the GI framework are brought forward in phase one of the development, to create a landscape structure or evidence is shown that substantive GI is secured as early as possible in initial phases of delivery to allow early establishment. Therefore, a Construction Environmental Management Plan (CEMP) will be required to set out how retained GI, such as trees, hedges and vegetation, as well as any nature designated sites (e.g., SSSI's etc.) will be protected during construction.</p>	<p>This will be addressed through future planning applications.</p>
<p>Essex County Council - Green Infrastructure</p>	<p>Another document that should be submitted as planning applications progress at the masterplan site is a Landscape Ecology and Management Plan.</p> <p>ECCs GI team supports the requirement under Supporting Documents [in section 8.0] for the submission of a Landscape and Habitat Management Plan.</p> <p>For this we would expect that no development shall take place until there has been submitted to and approved, in writing, by SuDS and landscape specialists at the Local Planning Authority a landscape ecological management and maintenance plan and work schedule for the habitat to be secured for at least 30 years via obligations/ conservation covenant.</p> <p>Details should include who is responsible for GI assets (including any surface water drainage system) and the maintenance activities/frequencies.</p> <p>We would also expect details on how management company services for the maintenance of GI assets and green spaces shall be funded and managed for the lifetime of the development to be included.</p>	<p>No change required to SMF</p> <p>Noted - requirement to submit a LEMP with future planning applications, which may be secured as a planning condition</p>

<p>Essex County Council - Broadband Connectivity</p>	<ul style="list-style-type: none"> <li>• In line with the objectives stated in the Government’s Future Telecoms Infrastructure Review 2018, all new developments should include provision of future proofed internet access, ideally Fibre to the Premises.</li> <li>• Where this is possible, provision of fully operational 5G mobile connectivity may also be accepted as appropriate broadband coverage, if arrangements are made for all premises in the development to access this at affordable prices, comparable to a fixed-line fibre broadband service, and this access is fully available at the time of completion of the build. Plans for such an approach should be submitted for review by the Planning Authority.</li> <li>• Developers are expected to proactively contact a telecommunications network operator of their choice to plan for internet connectivity installation as part of the build process. Developers are expected to provide details of their plans to install internet connectivity as part of their planning applications.</li> <li>• Any new housing development over 30 homes is likely to be provided with full fibre internet access (FTTP) free of charge by the large network operators. For smaller developments the network operators may request a contribution to the build cost. Openreach and Virgin Media have New Sites teams where developments can be registered.</li> <li>• Other network operators are available and developers can work with them, but confirmation must be provided that fibre connections installed by alternative operators will be fully connected to the internet by appropriate backhaul links and broadband services will be available for customers to subscribe to at the time the development is complete.</li> <li>• Where smaller in-fill type developments are built in areas within existing part-copper fibre-to-the cabinet (FTTC) coverage, developers are expected to work with the network operators, either to seek installation of full-fibre connections or to ensure that sufficient FTTC capacity to supply the new premises is made available when properties are completed.</li> <li>• Developers should be aware that in Essex, alternative network operator Gigaclear plc has a significant full-fibre network deployment in the Epping Forest, Uttlesford, Braintree and north Colchester areas. Gigaclear is likely to be keen to extend its own FTTP network to</li> </ul>	<p>It is confirmed that all housing and future businesses within the site will have broadband. The SMF has been updated on page 111 as follows: 'All new houses and businesses within the development will be provided with broadband prior to the first occupation of each dwelling/business.'</p>
<p>Environment Agency</p>	<p>Given that there are two main rivers (North Weald Brook and Queens Brook) on site, we are largely disappointed at the lack of consideration and mention of these within the Strategic Masterplan Framework (SMF). The rivers are not marked on most of the maps included in the SMF, and there is almost no discussion about policy for development in proximity to the main rivers. This should be updated to ensure that the presence of the rivers is fully highlighted to stakeholders and developers, and to ensure that there is no detrimental impact on the rivers as a result of the development.</p>	<p>The rivers are technically not within the SMF boundary, or in the case of Queens Brook, it abuts the South Western corner of the masterplan area. In addition, the constraints plan on p46 includes a 10m buffer to the rivers, and text within the key has been updated to "Main Rivers". In terms of built form, the proposed masterplan features no built development within at least 10m of the western and southern boundary edges (often with a greater set back). Other matters are subject to future flood risk assessment and drainage strategy to confirm no adverse affect on them. Text updated on p31 to state that "The constraints plan on p46 illustrates a 10m buffer to the main rivers on the site edges."</p>
<p>Environment Agency</p>	<p>Sustainable Drainage Systems (SuDS) The document makes close reference to the use of SuDS, which we support. Please however ensure that drainage schemes follow the requirements set out in Section G of the Environment Agency’s Approach to Groundwater Protection. Infiltration schemes may fall under the requirements of position statement G11:</p> <p>G11 - Discharges of surface water run-off to ground at sites affected by land contamination, or from sites used for the storage of potential pollutants are likely to require an environmental permit. This applies especially to sites where storage, handling or use of hazardous substances occurs (for example, garage forecourts, coach and lorry parks/turning areas and metal recycling/vehicle dismantling facilities). These sites will need to be subject to risk assessment with acceptable effluent treatment provided.</p> <p>Additionally, the use of SuDs and swales can provide the opportunity to enhance biodiversity. We also recommend exploring the enhancement of the river corridor with suitable wetland features such as ponds and swales which are less heavily engineered.</p>	<p>Text on p79 updated to state "The drainage strategy should follow the requirements set out in Section G of the Environment Agency’s "Approach to Groundwater Protection"."</p>
<p>Environment Agency</p>	<p>Biodiversity Main rivers form a valuable wildlife corridor that should be protected throughout planning. The land immediately adjacent to the river provides habitat for foraging, migrating, and breeding species, including otter. A key design principle should be to provide space for the river and the river corridor to provide good quality habitat and space for water. A minimum of 10m undeveloped buffer zone from the top of the bank of the river is expected (in line with the BNG metric). This should be free from hard landscaping (including footpaths and lighting). Maintaining an undisturbed and undeveloped buffer zone is important to protect biodiversity and support wider species populations.</p> <p>Natural flood management (NFM) techniques have been shown to provide both flood risk and biodiversity benefits. The use of woody materials within the ditch network to force water onto areas of the floodplain could provide further benefit and more sustainable habitat creation. We recommend NFM principles are included within the drainage proposals.</p> <p>Section 6.2 should give greater consideration to the main rivers, opportunities for enhancement, provision of natural buffer zones, etc.</p>	<p>Constraints plan on p46 includes a 10m buffer from main rivers, and there is at least a 10m buffer around the western edge and southern edge of the masterplan area. The western and southern edges are also the location of the proposed new SANG area, which will seek to strengthen existing and create new habitats. The proposed SANG area is located in the proposed Church Fields open space. Therefore, page 118, which covers this area has been updated to state " consideration to the main rivers, opportunities for enhancement, provision of natural buffer zones"</p>



<p>Environment Agency</p>	<p>River Enhancement - There is an opportunity for river restoration and enhancement works to be included within the masterplan to support wider plans and policy including:</p> <ul style="list-style-type: none"> <li>• Policy DM5 Green and Blue Infrastructure: In considering proposals for development the aim is to create a comprehensive network of green and blue corridors and places, appropriate to the specific rural or urban setting. In so doing, biodiversity will be enriched through habitat connection, improvement, and protection at all scales, including priority habitats.</li> <li>• Policy DM17 Protecting and Enhancing Watercourses and Flood Defences: All major development will be required, and minor development will be expected, to: (i) investigate and secure the implementation of environmental enhancements to open5 sections of the river or watercourse if appropriate.</li> <li>• Natural Environment and Rural Communities Act 2006/Environment Act 2021: Section 40, as amended by section 102 Environment Act 2021, establishes a general duty on public authorities including ourselves, to conserve and enhance biodiversity through the exercise of its functions. This is a recent amendment and has strengthened the original NERC06 duty from previously having regard for the purposes of conserving biodiversity, to public authorities periodically considering the actions it can take, consistent with the exercise of its functions, to conserve and enhance biodiversity, and then take that action.</li> <li>• Water Framework Directive/ Thames River Basin Management Plan: The Thames River Basin Management Plan (RBMP) sets out the environmental objectives for the river basin district, including statutory objectives for water bodies and protected areas. It also includes a summary programme of measures required to achieve these objectives. Under the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 (WFD Regulations), public bodies must have regard to the relevant RBMP in exercising their</li> </ul>	<p>The main rivers are not within the site boundary and as part of the SuDS strategy, mechanisms are in place to maintain river rates. Within the proposed Church Fields area, the SMF is improving habitats adjacent to the river courses. Therefore, no change is required to the SMF.</p>
<p>Environment Agency</p>	<p>Suitable Alternative Natural Green Space (SANG) SANGs are important areas meant to protect and enhance the areas around Special Protection Areas (SPA). To effectively protect the SPA, some areas of the SANG should be designed for nature with minimal access from the public. This will provide suitable nesting, foraging and migrating space for species that are reliant on the surrounding landscape, enhancing the biodiversity of the area. This is particularly important to protect the adjacent blue and green infrastructure (the watercourse and Church Lane Flood Meadow Local Nature Reserve) from the pressures of disturbance. We recommend the areas adjacent to the river and the nature reserve are free from built environment and landscaped to provide refuge for species found in this area, including, Lesser Redpoll, Skylark, Linnet, Golden Plover, Yellowhammer, Reed Bunting, Turtle Dove, Common Cuckoo, and the Small Heath butterfly. Additionally, there are multiple records for protected and rare plant species in this area. Therefore, any landscaping seed mix should include seed from local provenance to ensure that the area continues to support a high biodiversity.</p>	<p>The appropriate planting and seedmix will be considered as detailed proposals for the SANG are brought forward.</p>
<p>Environment Agency</p>	<p>Flood Risk and Proximity - We are pleased to see that development has been preferentially located away from areas at risk of fluvial flooding, although a specific policy about avoiding development in locations at risk of flooding has not been included in the SMF and we would like to see this included.</p> <p>The SMF document acknowledges that different parts of the Masterplan area will be brought forward for development separately by different developers and landowners. We would like it to also be stated that when sites are brought forward for development, they should be designed in accordance with the principles of the SMF, but also in accordance with the most up-to-date flood risk policy and best available data. This is because policy and data may change between the publication of the SMF and the development of specific sites.</p> <p>Currently the SMF only assesses the Flood Zones as derived from the Flood Map for Planning, which only takes into account the present-day undefended scenario. The council should also request the detailed hydraulic modelling from the Environment Agency and assess defended outlines and climate change scenarios. The mapping and policies should also include consideration of Flood Zone 3b. Figure 3.35 should also make the distinction between the Flood Zones clearer and include Flood Zone 3b.</p> <p>Figures 3.20 and 3.21 of Section 3.3 need to be made clearer as it is currently difficult to distinguish the flood zones/outlines. The maps should also clearly mark watercourses/main rivers (North Weald Brook and Queens Brook) as well as flood defences/flood storage areas. Following this, figures 5.1, 5.2, 5.4, and 6.3 need to show the main rivers/watercourses clearer.</p> <p>Mandatory spatial principles within Section 5.2 should include a clear policy about development in areas at risk of flooding, and in proximity to the river. As well as this, Section 5.4 should better consider the rivers as part of the blue infrastructure within the Masterplan area and include better policies about development in proximity to the river and opportunities for environmental and flood risk betterment. This should include a clear policy on the need for a natural buffer zone of at least 8m on each side of any main rivers.</p> <p>More clarification is needed regarding the buffer zone in Figure 3.35 of Section 3.8. The buffer zone should start from the top of the bank of the river, but this is unclear. Furthermore, Section 5.5 should include a policy about footpaths in proximity to the river, to ensure no detrimental impact on the river or riverbank.</p> <p>Connections to North Weald Airfield will need a bridge over the main river but this has not been acknowledged. If a new bridge must be installed, then this will have to meet the requirements for a bridge over a main river (specific soffit levels etc.) to ensure no increase in flood risk.</p> <p>We note that a Flood Risk Activity Permit from the Environment Agency will be required for any works:</p> <ul style="list-style-type: none"> <li>• on or within 8 metres of a main river (16 metres if tidal)</li> <li>* on or within 8 metres of a flood defence structure or culvert (16 metres if tidal)</li> <li>• on or within 16 metres of a sea defence</li> <li>• involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert</li> <li>• in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission.</li> </ul>	<p>The Masterplan area will come forward in different phases over the course of the plan period. It will be necessary, as part of the future detailed planning applications, to not only accord with the principles of the SMF, but also the current Flood Risk Policy and data that is available at that time. As set out elsewhere within this table, a 10 metre buffer to the main rivers on the site edges has been incorporated to the proposed framework plans.</p>

Environment Agency	<p>Groundwater and land quality</p> <p>Groundwater and land quality issues have not been discussed within the document and these should be incorporated. With respect to groundwater and land quality issues:</p> <ul style="list-style-type: none"> <li>• Specific National Planning Policy Framework (NPPF) paragraphs 180, 189 and 191 should be considered.</li> <li>• Relevant guidance such as the Environment Agency's Approach to Groundwater Protection and Land Contamination Risk Management (LCRM) should be promoted.</li> <li>• The Approach to Groundwater Protection should be considered with regard to development proposals that we would object to in principle.</li> <li>• Policies should require developers to submit a Preliminary Risk Assessment (PRA) together with a planning application where land is potentially contaminated.</li> <li>• Policies should require developers to ensure sites are suitable or made suitable for intended use.</li> <li>• Policies should require developers to prevent discharges to ground through land affected by contamination.</li> </ul> <p>In line with NPPF Paragraph 189(c) "Planning policies and decisions should ensure that adequate site investigation, prepared by a competent person, is available to inform these assessments".</p> <p>NPPF defines a competent person (to prepare site investigation information) as:  "A person with a recognised relevant qualification, sufficient experience in dealing with the type(s) of pollution or land instability and membership of a relevant professional association"</p>	No change required to SMF as this is a level of detail dealt with at future planning application stage. The SMF does not need to recreate national or Local Plan policies in this regard and should be focused on site specific issues.
Environment Agency	<p>Piled foundations</p> <p>The design of development sites may require piled foundations. Penetrative foundation works through the London Clay can potentially create preferential migration pathways for contaminants present in shallow soils. Should foundation works penetrate through the London Clay to the underlying aquifers then a Foundation Works Risk Assessment (FWRA) should be required to ensure that the risks to groundwater are understood and mitigated.</p>	No change required to SMF as this is a level of detail is best addressed on a case by case basis as part of structural design work including a full Ground Investigation being a condition of future planning permissions.
Environment Agency	<p>Historic Landfill</p> <p>The School Green Lane site sits atop a historic landfill. Development at this site may therefore require an Environmental Permit. Developers at any allocated sites located on a historic landfill would need to make enquiries regarding potential requirements under the Environmental Permitting Regulations 2016.</p>	Noted
Environment Agency	<p>Water Efficiency - increased focus on water resources - We are encouraged by the SMF's inclusion of Epping Forest local plan policy DM19 (page 89), which mandates that new homes should achieve a water efficiency standard of 110 litres or less per person per day and that major non-residential developments should achieve at least a 30% improvement over baseline building consumption. We would, however, like for these requirements to be given greater prominence in Chapter 5. Improved water efficiency represents a better use of natural resources, which is a key principle of the National Design Guide (page 11). We therefore request that the section 5.10 ('Sustainability principles', page 85) be moved to an earlier position in the chapter.</p> <p>Our reason for requesting this is due to the significant pressure being exerted on North Weald Bassett's water resources. Affinity Water – the providers of mains water to the area - operate in an area of 'serious' water stress. 'Serious' water stress areas are those where the current or future demand for household water is, or is likely to be, a high proportion of the effective rainfall available to meet that demand.<sup>1</sup> The scale of the water resources challenge faced in the south east of England is demonstrated in the National Framework for Water Resources (Environment Agency, 2020). An additional 1765 megalitres of water per day (p. 4) is required by 2050 to:</p> <ul style="list-style-type: none"> <li>• supply the growing population (the population in the South East increased by more than 7.5% between 2021 and 2022);</li> <li>• make our supplies more resilient to drought (nine of the 10 warmest years have occurred since 2005, with the last five years comprising the five hottest<sup>3</sup>); and</li> <li>• address the impact of climate change (the IPCC have stated human activities have unequivocally caused global warming, driving significant changes to established natural water cycles<sup>4</sup>).<sup>5</sup></li> </ul> <p>Given the current and future strains on regional water resources, it is imperative that per capita water use in Epping Forest is at its most efficient. At least 56% of Affinity Water users are using more than 150 litres per head per day, with 22% using more than 300 litres per head per day.<sup>6</sup> This level of usage is unsustainable. The North Weald Bassett masterplan – being a project consisting almost entirely of new developments – therefore represents a prime opportunity to improve the rate of resource use in Epping Forest. This is why we believe that 'Sustainability principles' should be given greater primacy in Chapter 5.</p>	P110, under Water Management 4, 5, text added to state "New homes to meet a water efficiency standard of 110 litres or less per person per day - developers should seek to reduce this where possible"
Environment Agency	<p>Water Efficiency - going beyond the Epping Forest local plan - As well as placing greater emphasis on the need to achieve DM19's water efficiency aims, we would expect the SMF to remove the reference to policy DM19's dispensation that 'the [water efficiency] standards... will apply unless, in exceptional circumstances, it can be clearly demonstrated that it would not be feasible on technical or viability grounds' (page 89). Given the water stress situation, it is not appropriate for North Weald Bassett proposals to potentially avoid the standards set in DM19 Part A(ii) and (iii) (page 111 in the Epping Forest Local Plan). It is not considered technically infeasible or unviable to deliver 110 litres per person per day, as such efficiency standards are primarily met through the installation of water efficient fittings and/or the inclusion of water recycling systems. Consequently, we would support the SMF in going beyond the Epping Forest Local Plan by insisting that proposals achieve the water efficiency targets in DM19 Parts A (ii) and (iii). To support proposals in achieving this, we invite the SMF to consider including some additional guidance. This is particularly in reference to non-residential developments achieving 'at least a 30% improvement over baseline building consumption' (page 89). We recommend making reference to BREEAM technical standards, and drawing particular attention to the WAT 01 category for water efficiency. These technical standards clearly describe the industry standards and solutions for water efficiency. They also detail the 'score' that a building might achieve were such solutions implemented. For reference, we strongly recommend that buildings achieve an 'Excellent' rating in the WAT 01 category.</p>	The policy quotation is taken from the EFDC Local Plan, and reflects the applicable policy in this regard. No change is therefore required to the SMF.

<p>Environment Agency</p>	<p>Water recycling and harvesting - We note that the SMF has included the Water Management elements of the Epping Forest Sustainability Guidance Checklists (page 91). These state that developments should seek the provision of ‘water butts with grey water recycling and harvesting (where possible)’. We believe that the North Weald Bassett masterplan – consisting almost entirely of new developments with limited restrictions posed by existing building stock or infrastructure – represents a fantastic opportunity to realise such initiatives. We would therefore encourage water recycling/harvesting to take a much more prominent position in Chapter 5. Rainwater harvesting systems have been calculated as being able to provide 18-87% of a building’s non-potable water demand (as well as decreasing the volume of surface run-off by 75%).<sup>7</sup> A 2010 study by the Environment Agency demonstrated that greywater recycling in a two-storey house can offset mains water by up to 76 m<sup>3</sup> water per year.<sup>8</sup> Were such systems to be realised in the North Weald Bassett Masterplan Area, they would have a significant impact on satisfying local plan policy DM19. Measures that improve water efficiency can also deliver cross-purpose benefits. Rainwater harvesting/greywater recycling, for example, is top of the SuDS drainage hierarchy in the SuDS Design Guide for Essex, a guide referenced by the SMF (page 25). A better use of water resources therefore also mitigates the risk of increased surface water runoff. Additionally, in 2008 the Environment Agency conducted a study Cont/d..</p> <p>regarding the greenhouse gas implications of a number of water resource options. Relevant outcomes of the study were:</p> <ul style="list-style-type: none"> <li>•89% of emissions in the water system can be attributed to ‘water in the home’. This includes energy for heating water but excludes space/central heating.</li> <li>•The remaining 11% of emissions originate from abstracting, treating and supplying water, and the subsequent wastewater treatment.</li> <li>•Demand management measures, particularly those that reduce hot water use, have significant potential to save water and energy, and reduce the carbon footprint throughout the water system. This could result in a reduction of greenhouse gas emissions, and household utility bills.</li> </ul> <p>Efficient water use can therefore also contribute to reductions in greenhouse gas emissions, demonstrating that designing for the sustainable use of water resources can improve the sustainable use of energy resources.</p>	<p>The policy quotation is taken from the EFDC Local Plan, and reflects the applicable policy in this regard. No change is therefore required to the SMF.</p>
<p>Environment Agency</p>	<p>Water quality - mitigating increased surface run off - Under regulation 33 of the Water Framework Directive (WFD), Epping Forest District Council has a legal responsibility to have regard for the Thames River Basin Management Plan, which in turn has a legal responsibility to ensure that there is no deterioration in the ecological status of any water body or of its associated elements. The district council therefore also has a legal responsibility for supporting water body enhancements that might enable water body objectives to be met. The objectives for each water body are publicly available via the Catchment Data Explorer (the details of specific actions identified by the Environment Agency as being required to meet these objectives are available on request).</p> <p>It is therefore important that the SMF supports the council’s WFD responsibilities. North Weald Basset is within the Cripsey Brook surface water body. We strongly recommend that the SMF clearly states that neither the Cripsey Brook water body nor any of its associated elements must experience deterioration as a result of any work completed under any proposal.</p> <p>The Catchment Data Explorer reveals that the Cripsey Brook water body is not currently suffering adverse impacts due to urban surface run-off. However, the construction of 1050+ homes, new facilities and a new school would significantly increase the impermeable cover in North Weald Bassett (more pavement, roofs, roads, etc), which in turn would increase the volume of surface water run-off in North Weald Bassett. Without appropriate mitigation, the North Weald Bassett masterplan will increase the likelihood of deterioration of associated elements in Cripsey Brook. It is therefore important that the masterplan takes steps to prevent this increased run-off from transferring into watercourses (e.g. the Gullet Brook at the west of the site).</p> <p>We are encouraged that the masterplan contains considerable provision for green and blue infrastructure, noting the large provision for attenuation basins (page 58; Figure 5.4, page 58). If managed appropriately, the blue and green infrastructure proposed in the SMF would go a long way to mitigating the increased rate of surface run-off in the Masterplan Area. Likewise, we are pleased to see the requirements of Epping Forest Local Plan Policy DM16 – which mandates run-off rates and storage capacity – being included on page 90 and interpreted in the blue and green infrastructure section (page 61). Nonetheless, we emphasise that the avoidance of deterioration of the Cripsey Brook is a legal obligation of the district council, and that this should be understood while regarding all proposals.</p> <p>We also could not see an expectation that proposals would include plans for the management of any installed blue/green infrastructure. We recommend that the SMF stresses the need for any and all proposed blue/green infrastructure to make clear what bodies will have responsibility for maintaining the structures, as without proper management such infrastructure will lose efficiency.</p> <p>The Catchment Data Explorer identifies the Cripsey Brook water body as suffering from diffuse pollution from transport drainage. Under the requirements of the WFD, this impact must not worsen. The SMF would significantly increase the local population and thus the local road traffic. The SMF would therefore place greater transport drainage pressure on the Cripsey Brook water body. Consequently, we feel the SMF would be strengthened were the specific need to mitigate the impact of this increased transport be added to the blue/green infrastructure section.</p>	<p>No change required to SMF as this is a planning application and management issue. It is a future detailed drainage issue for future applications, as part of a drainage strategy, not the SMF</p>

Environment Agency	<p>Building based SuDS - We are supportive of the SMF utilising a SuDS-based approach in minimising surface run-off (page 61). We are also encouraging of the SMF's ambition to roll-out such infrastructure across the development area at a street level, as described in point 2 of the proposed drainage strategy overview (pages 60-61). However, we note neither this strategy nor the green and blue infrastructure section makes any mention of green and blue infrastructure that is deployed on buildings. Examples of such initiatives might be rainwater harvesting (as mentioned earlier in this response) or green roofs. We therefore would like to see the utilisation of all building stock for building-based SuDS added as a third element to the SMF proposed drainage strategy.</p> <p>While we appreciate that green roofs (or brown and blue roofs) are deemed costly to maintain on traditional pitched residential roofs, we believe that there are ample flat roofs in the masterplan (for example, in the extended Social Heart) to warrant their specific mention as a recommended SuDS measure. After all, they are directly referenced in Epping Forest Local Plan policy DM16 as something to be encouraged in all developments (page 60). In 2011, the Museum of London installed a series of green roofs.<sup>10</sup> In three years these roofs achieved mean rainfall attenuation rates of 93% in the summer and 89% in the winter, and achieved improvements in run-off flow rate of 29-100%. Green roofs therefore are demonstrably effective in reducing the rate and volume of urban surface run-off.</p>	At p110 of SMF, there are already several bullet points related to water management, including rainwater harvesting. The SMF relates to strategic drainage network and individual future detailed applications will relate to individual buildings.
Environment Agency	<p>North Weald Sewage Treatment Works - All developments under the masterplan must properly demonstrate that there is adequate capacity at North Weald STW to handle all waste coming from the new building stock. The Essex and Thurrock Catchment Strategic Plan (part of Thames Water's Drainage and Wastewater Management Plan) reports that the two sewer overflows in the North Weald STW catchment discharged 115 times in 2011 alone. These overflows are triggered when there is excessive flow in the foul sewer system, which occurs when the volume of water entering the sewer is too great. The triggering of these overflows therefore suggests that the North Weald STW is already experiencing issues with capacity. The 1050+ homes in the SMF would represent a population increase in the North Weald STW catchment of approximately 2,478.<sup>12</sup> This is a 43% increase on the population of 5,755 currently quantified by the Catchment Strategic Plan. This demonstrates that the SMF would place significant additional pressure on North Weald STW, and possibly result in additional discharges of untreated wastewater into the environment.</p> <p>We therefore request that the masterplan mandates that all proposals demonstrate early engagement with Thames Water regarding capacity in the sewer network and phasing of development. The Catchment Strategic Plan highlights network improvements and surface water management as key solutions for managing the challenges in the catchment.<sup>14</sup> It is therefore likely that any development would need to demonstrate high water efficiency and significant surface run-off reduction in order to be in-step with Thames Water's plans.</p>	Text added to p28 to state that "applicants are advised to engage with Thames Water on the capacity of the existing WWTW"
Environment Agency	<p>Water management planning - On issues of both water efficiency and water quality, best practice is to fully understand the demands for and movement of water within an area. We strongly recommend that the SMF incorporates the need to conduct a water cycle study and surface water management plan for the proposed North Weald Bassett Masterplan Area. These would augment the vision in the SMF and give clear guidance on the development requirements of proposals.</p> <p>Water cycle studies are a recommended approach for understanding not only the pressures an area puts on the sewage network but also the demands that it places upon the water supply. Water cycle studies can also highlight opportunities for interventions that may alleviate either or both stresses (for example, what kind of SuDS may be appropriate in which location). More information on water cycle studies can be found here: Water cycle studies - GOV.UK (<a href="http://www.gov.uk">www.gov.uk</a>)</p> <p>A surface water management plan would allow the SMF to identify the measures required to reduce the volume of contaminated urban run-off entering watercourses or the foul sewer system. More information on surface water management plans can be found here: Surface water management plan technical guidance - GOV.UK (<a href="http://www.gov.uk">www.gov.uk</a>)</p>	Added text p79 to state "Surface water management strategies are a requirement for each developer"
Epping Forest Heritage Trust	The overall increase in traffic volumes resulting from the NWB masterplan and from other large developments in the EFDC area have the potential to cause additional damage to the Forest. We are concerned that the issue of traffic impacts upon the air quality in the Epping Forest SAC and SSSI, the need to mitigate traffic impacts, and the measures needed to reduce air pollution, including the possible need for a Clean Air Zone (CAZ) to reduce air pollution, are not given sufficient prominence in the SMF.	No changes are proposed to the SMF in relation this comment as this was fully tested and examined through the Local Plan examination and with the adoption of the Council's Air Quality Mitigation Strategy. This is not therefore an SMF matter but with suitable mitigation to be secured at planning application stage as per the adopted EFSAC Air Quality Mitigation Strategy.
Epping Forest Heritage Trust	The provision of Suitable Alternative Natural Greenspace (SANG) is essential to reduce visitor pressure on the Forest. We welcome the proposals in the SMF but believe the EFDC's far-sighted commitment in its "Green Infrastructure Strategy", that c20ha of SANG should be provided to "future proof" the development, should be included within the SMF.	While the opportunity to explore a larger SANG of 20ha was identified within the Green Infrastructure Strategy it was acknowledged that this was not a specific requirement given the current Zone of Influence from EFSAC. EFDC continues to investigate wider SANG opportunities in the vicinity with it not possible to secure this within the masterplan area given the number of different landownerships and housing numbers to be accommodated.
Epping Forest Heritage Trust	The statements on the incorporation of Electric Charging (EV) points and solar panels on new buildings within the Masterplan area should be clearly framed as commitments that developers will be required to fulfil.	Text on EV charging is already included within the SMF on p74, p88 (both in new homes and community facilities). Solar panels are referenced on p107 and p111. These will be secured through the determination of planning applications. It is also noted the EV Charging Points now form part of Building Regulations requirements.
Epping Forest Heritage Trust	The construction of a minimum of 1,050 homes in NWB (along with increased traffic from the North Weald Airfield and the large developments at Latton Priory and South Epping) will inevitably lead to more vehicles travelling along Forest roads or within 200 meters of the Forest. The additional traffic movements for the NWB.R3 site alone are forecast at approximately 410 and 435 additional two-way vehicular trips within the morning and afternoon peak hours respectively. The SMF (page 69) states that 29% of traffic heads towards Epping which would be likely to result in traffic through or near the Forest (continued below)	No changes are proposed to the SMF in relation this comment as this was fully tested and examined through the Local Plan examination and with the adoption of the Council's Air Quality Mitigation Strategy. Each planning application to refer to the requirements of the Local Plan and Air Quality Mitigation Strategy. This is not therefore an SMF matter.

Epping Forest Heritage Trust	<p>We note that these traffic impacts have been reflected in the HRA 2022 supporting the adopted Local Plan and that mitigation measures have been included in the Interim Air Pollution Mitigation Strategy of December 2020. But given the significant damage that has been, and continues to be, caused to the Forest flora by air pollution we feel that the possible impact of additional traffic upon the Forest should be given greater emphasis and covered in more detail in the SMF.</p> <p>Specific reference should be made in the SMF both to the need to meet the requirements of Local Plan Policy DM2 "Epping Forest SAC and the Lee Valley SPA" (in particular that there is no adverse effect on the site integrity of the Epping Forest Special Area of Conservation) and to the Interim Air Pollution Mitigation Strategy and to the measures and undertakings it describes.</p>	The SMF has been updated on page 108 to state: "In accordance with Policy DM2: Epping Forest SAC and Lee Valley SPA, the SMF and future development proposals will assist in the conservation and enhancement of the biodiversity, character, appearance and landscape setting of the Epping Forest and Lee Valley. The proposals will ensure no adverse effect on the integrity of the Epping Forest SAC and the Lee Valley SPA."
Epping Forest Heritage Trust	<p>In summary, we believe the issue of air pollution in the Forest resulting from the NWB Masterplan as a whole, not just the individual proposals, and from the other Masterplans in the District, needs to be revisited in the near future as the detail of the various developments comes into focus, and more accurate assessments can be made of traffic and pollution levels and the success of the measures intended to mitigate their impact. In addition, there need to be clear targets, information about current pollution levels and a timetable published about the possible introduction of a CAZ. We also welcome the EFDC's commitment to moving to Net Zero Carbon Homes and the statements within the Framework on the installation of Electric Vehicle (EV) charging points and on the installation of solar panel/photovoltaic cells on buildings (page 54). Given the importance of reducing air pollution and mitigating climate change, however, we believe these intentions should be clearly described in the SMF as commitments that developers will be required to fulfil. We believe the above issues are significant and need to be taken into account by the planning authority as it develops the Framework for the NWB Masterplan.</p>	No changes are proposed to the SMF in relation this comment as this was fully tested and examined through the Local Plan examination and with the adoption of the Council's Air Quality Mitigation Strategy. We agree that air quality is a key issue for the delivery of sites; however, we do not consider that it is a consideration for the SMF and will be dealt with at planning application stage. Policy P6 of the Local Plan (part I) sets out a clear requirement to consider the impacts of development on air pollution. We therefore agree it is an important consideration, but part L of Policy P6 does not reference air quality and therefore we do not believe that it needs to be addressed within the SMF. In addition the SMF seeks to provide reduced parking per home, a mobility Hub, improved pedestrian and cycling connections and EV provision as well as improved bus services. These measures are aimed at reducing traffic and traffic borne air pollution.
Historic England	<p>Overall, we welcome the aims and ambitions underpinning the masterplan. Its landscape led approach and consideration of North Weald Basset's unique heritage and character to incorporate a new community alongside the existing village settlement to the south. Our concerns lie in relation to development on the west part of NWB R3, in particular, the development for residential of the area west of the primary street (as reflected in the Illustrative Masterplan – fig 5.2. p.55) would detract from the setting of St Andrew's Church and Church Cottage, changing its rural character and impinging on prominent views of the church, harming its significance. Ideally, leaving this area clear of dwellings would better preserve their settings. Further reducing density of development west of the primary road would help reduce its impact, ensuring the prominence of the assets is preserved and the identified key strategic views and wayfinding points are fully appreciated. We would also strongly recommend that your conservation officer, Archaeological colleagues at Essex County Council and the Historic Environment Record are consulted throughout any future process.</p>	No change proposed to SMF as during the examination of the Local Plan Historic England confirmed via a statement of common ground (March 2019) which notes that there are no outstanding objections to policy P6 NWB masterplan area in relation to the Grade II* Church of St Andrew or the Grade II Church Cottage. The masterplan has had regard to the church and its setting and has sought to preserve views of it. Detailed affects of developments are more appropriately further tested through the determination of individual planning applications and through particular character measures to be incorporated into a future design code.
Historic England	<p>Wider heritage benefits - The National Design Guide sets out that well designed places and buildings are influenced positively by the history and heritage of a site and its surroundings, as well as informed by the significance and setting of heritage assets that merit conserving and enhancing. It specifically asks designers to consider how heritage may be incorporated into proposals, so it is inclusive and accessible to all. We welcome that contained within the SMF are references to heritage assets beyond the area boundary including the GII Control Tower located at North Weald Airfield, and importantly, the North Weald Redoubt, a Scheduled Monument located south of North Weald Bassett, which is currently on Historic England's Heritage at Risk register.</p> <p>Whilst we note the monument falls outside of the SMF, we consider that the SMF presents an opportunity to secure heritage benefits through increased wayfinding, heritage interpretation, and in the case of the Redoubt, production of a conservation management plan for could seek to secure its conservation and enhancement over time and add heritage value to North Weald Bassett as a whole. To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed Strategic Masterplan Framework, where we consider these would have an adverse effect on the historic environment.</p>	The North Weald Redoubt is not within or adjacent to the SMF area and it is beyond its scope to provide a conservation management plan.
National Highways	<p>We welcome the fact that the promotion of sustainable travel, the provision of facilities and services is promoted in your plan despite the challenges thrown up by the rural nature of the site. As this will not only help reduce CO2 emissions but also improve the health of those who choose to travel by foot or cycle to and through the site. In due course there will need to be a detailed Transport Impact Assessment carried out, this will need to give an indication of the impact of the development on the M11 and its junctions, in particular j7,7a, 6 and 8, if any. Careful planning will be required to ensure that the development comes forward in the way intended and phases do not get out of step with the provision of infrastructure and services. Adequate cycle parking needs to be thought about early in the design process as this is often overlooked and provided as an afterthought.</p>	No changes proposed to SMF as it already includes reference to a Transport Assessment. The timing of infrastructure is best addressed through planning applications and s106 agreements. The reference to early planning of cycle parking is noted and more appropriately addressed through the Design Code.

Natural England	<p>SANG - Natural England notes that Figure 3.17 shows the extent of an odour plume from the waste water treatment works that are immediately adjacent to the western boundary of the masterplan red line boundary. The masterplan states that 'the odour plume, although unlikely to constitute significant pollution, would not be appropriate as a location for new homes. The odour plume extends over much of the proposed Suitable Alternative Natural Greenspace (SANG) and is shown as a constraint on Figure 3.35.</p> <p>Natural England also notes that the masterplan framework states that the Waste Water Treatment Works is of secondary importance [in terms of noise pollution] but it is continuous in nature and location. The Waste Water Treatment Works is directly adjacent to the proposed SANG location, so has the potential to cause an unpleasant intrusion in terms of noise pollution. Natural England regards noise levels of 60dB or greater to be unacceptable on a SANG.</p> <p>The purpose of a SANG is to provide high quality, attractive natural greenspace that provides a genuine alternative to visiting Epping Forest Special Area of Conservation (SAC). A site with the potential for unpleasant smell or noise intrusions from an adjacent Waste Water Treatment Works will not fulfil that function and does not meet Natural England's essential criterion in relation to being free from unpleasant intrusions, e.g. from sewage treatment works smells or noise. Further clarification and evidence are required within the masterplan framework regarding the significance of the mapped odour plume, as well as noise levels to ensure that the proposed SANG would not be subject to any unpleasant intrusions and is fit for purpose.</p>	<p>The odour plume as shown on Figure 3.17 only covers a proportion of the SANG and the majority of the SANG is outside of any significant odour plumes. The statement within the SMF is considered to be misleading, given that residential development would be appropriate within large areas of the SANG having regard to odour and has therefore been updated (see below). In addition the location of residential development and SANG has been informed by IAQM guidance. Residential development and schools are identified as high sensitivity land uses with regard to odour. The proposed SANG is a low sensitivity receptor based on the fact that the users of the space are transient. NWB is a small WWTW, this is reflected by the limited nature and strength of odour concentrations. The land surrounding the WWTW is a local nature reserve that is presently well used by dog walkers, with paths in significantly closer proximity than the proposed walking routes within the SANG. Although the odour is not significant, in any event the odour plume affects less than 1 minute walk time. Thames Water need to upgrade the WWTW and there are options as a result of this to reduce odour concentrations. Text in SMF is therefore updated as follows: "The WWTW has been surveyed by Odournet. This has resulted in a mapped area (odour plume). This odour plume does not cause significant pollution."</p> <p>In respect of noise, a noise assessment has been prepared and submitted as part of a current hybrid planning application on the NWB.R3 site area. This concludes that noise levels from the WWTW will not result in any undue noise pollution, with noise levels significantly below 60dB. Therefore no changes required to the SMF in this regard.</p>
Natural England	<p>Natural England acknowledges that the quantum of SANG provision (4.84ha) is sufficient to mitigate the number of residential dwellings within the masterplan area that fall within the Epping Forest SAC Zone of Influence (ZOI). However, Natural England is of the view that the proposed SANG is nonetheless too small to meet all of NE's essential criteria, in particular the need to provide a circular walk of 2.3-2.5km within the red line boundary of the SANG. Natural England attaches no weight to links to the wider Public Rights of Way (PRoW) network or third-party greenspace, as SANG must be secured in perpetuity (taken to be a minimum of 80 years), and routes on third party land cannot be secured in perpetuity with the certainty required by the Habitats Regulations.</p>	<p>The confirmation from NE that the quantum of SANG provision is sufficient to mitigate the number of dwellings is welcomed. In this context, it should be recognised that the SANG provides a substantial over-provision of SANG in this regard, which using a 2.4 person per population figure would provide a requirement for 1.86ha of SANG on the site, against the proposed provision of 4.84 hectares. The proposed size of the SANG is considered to be appropriate and in this context this is the first SANG in a network of SANG's identified within the Epping Forest Local Plan. This includes land identified for a SANG to the west of the SMF area. In terms of the walking route there remains options which can be explored within the masterplan area and on adjoining public sector land to deliver a suitable route and this can be detailed further at planning application stage. The importance of a management company to secure the long-term maintenance of the SANG is agreed, which can be secured by a legal agreement at planning application stage.</p> <p>Text added to SMF p79 to state that "The detailed design of the SANG brought forward in a planning application should be fit for purpose and enable suitable lengths of walking route to be provided"</p>
Natural England	<p>Natural England advises that the Masterplan Framework should be updated to provide details of a SANG proposal which provides a 2.3-2.5km circular walk within the red line boundary, as we are not currently able to endorse the proposed SANG as suitable mitigation for adverse effects on the integrity of the Epping Forest SAC. Prior to being endorsed by Natural England, all SANG proposals must include a SANG Management Plan that provides clear information on how the SANG will be managed in perpetuity (taken to be a minimum of 80 years) to ensure that all of NE's essential criteria for SANG continue to be met over time and the SANG space remains fit for purpose. The SANG Management Plan should make clear which legal entity will be responsible for in perpetuity management of the SANG. Natural England considers transferring the SANG land to the Local Planning Authority (LPA) as the preferred option. Alternative options include the transfer to a third-party land management charity such as the Land Trust, local Wildlife Trust or similar body, or lastly to use a third-party management company. If the SANG is to be managed by a third-party management company, step-in-rights will need to be agreed in writing with the Local Planning Authority. The LPA should provide confirmation that they will provide step-in-rights for the proposed SANG management company. Step-in-rights may not be required if charities such as the Land Trust are the managing body. If step-in rights are needed, then Natural England would require written confirmation of the LPA's agreement to take on the site and appropriate wording to be incorporated in the legal agreement. This is to ensure that the SANG would be managed by the LPA in perpetuity should the management company cease trading.</p>	<p>It is agreed that the need for a management company is critical and it is considered that this is best secured as part of a legal agreement at planning application stage.</p>
Natural England	<p>Natural England will also require in perpetuity management of the SANG to be legally secured as part of future planning consent, in order to provide the required certainty under the Habitats Regulations. Natural England advises that the masterplan framework be updated to include further detail as appropriate on the requirement for applicants to prepare a SANG Management Plan for the proposed SANG and name a legal entity that will manage the SANG in perpetuity.</p>	<p>As set out above the management of the SANG is a critical issue, but best secured as part of the Section106 agreement at planning application stage.</p>
Natural England	<p>Page 11-12 'National Guidance': The Strategic Masterplan Framework should reference Natural England's Planning and Green Infrastructure Design Guide GI Design Guide which provides details of what good GI design looks like. The guide is linked to the ten characteristics of well-designed places set out in the National Model Design Code and the National Design Guide.</p>	<p>This section specifically relates to the National Design Guidance and therefore it is not considered appropriate to introduce such text into this specific section. However an additional sentence is included at the introduction of 5.4 to include the requested document reference.</p> <p>Paragraph 6.4 has been amended to read as follows: "The green and blue infrastructure framework is illustrated in figure 6.4, and described over the next few pages. Future detailed design should give consideration to Natural England's Planning and Green Infrastructure Design Guide".</p>

Natural England	<p>Page 24 'Ecology': Natural England notes that St Andrew's Church was found to have roosting Western Barbastelle Barbastella barbastellus bats and that up to nine bat species have been recorded using the site. The proposals should seek to maximise the potential for bat commuting routes from St Andrew's Church down the western boundary, as well as along new green corridors, and to design Green Infrastructure and the SANG to improve foraging and commuting habitat for bats. For example, this could take the form of woodland planting, standing waterbodies and species-rich hedgerows linking existing and new woodland. The detail should be informed by the on-site bat survey results.</p>	<p>Given the nature of bat activity in the area and extensive green corridors proposed within the masterplan area, the text has been updated to reflect Natural England's comments.</p> <p>At Page 29 a new last paragraph to the ecology section has been added as follows: "At the detailed design stage, proposals should seek to maintain and enhance opportunities for bat foraging and commuting routes from St Andrew's church on the western edge of the masterplan area and on other green corridors. For example, this could take the form of woodland planting, standing waterbodies and species-rich hedgerows linking existing and new biodiversity habitat. This should be informed by on-site bat surveys."</p>
Natural England	<p>Page 52 'Urban design influences': Natural England welcomes the direct references to creating 'walkable neighbourhoods' and the 15 minute neighbourhood concept. One of the development principles is to "Consolidate the structure of the settlement to make it more 'walkable' and accessible". Three of the visioning themes (page 48 of the masterplan framework) also reference this:</p> <p>5. Ensure each new home is within 150m of a greenway or area of open space 7. Create a 15-minute social neighbourhood with excellent walking and cycling links 18. Encourage walking and cycling with new destination and recreation links with overlooking, compact walkable blocks.</p> <p>These are all welcomed, especially the 150m target and the masterplan framework should look to directly link this to the Government's ambition for 15-minute neighbourhoods and the new accessible greenspace standards. This seeks to ensure that everyone has access to good quality natural greenspace within 15 minutes' walking distance from their homes, in line with Natural England's Accessible Greenspace Standards and Green Flag Criteria. This has also been referenced within the Government's Environmental Improvement Plan (EIP).</p> <p>Specific requirements should be included within the masterplan framework to deliver the required provision of accessible greenspace in terms of size, proximity, capacity and quality, informed by the Natural England's Accessible Greenspace Standards. There is also an opportunity for this development to adopt the GI standards for major development in terms of the quantity, quality and accessibility of new greenspace provision, as well as the long-term stewardship arrangements.</p>	<p>The accessibility to green spaces is a core component of the SMF proposals and emphasising this as part of the urban design influences is considered appropriate. An additional paragraph has therefore been added to this section to reflect these comments:</p> <p>"The accessibility of green spaces and green corridors is a defining feature of the SMF. The green corridors and open spaces identified in this SMF should be incorporated into individual planning applications and their future detailed design should have regard to Natural England's Accessible Greenspace Standards and Green Infrastructure Standards where appropriate."</p>
Natural England	<p>Page 53 'Airfield masterplan area': Natural England notes that North Weald Airfield is subject to a separate Strategic Masterplan Framework, which provides for new employment opportunities on the eastern edge of the airfield footprint. The North Weald Bassett Strategic Masterplan Framework proposes a pedestrian and cycle link only between the new housing and employment areas, the reason being to keep the link as short as possible to maximise its use – Natural England supports this strategy. Natural England recommends that that the GI provision for the two schemes look to connect and link together as far as possible. They should also share the same environmental principles to ensure a holistic approach.</p>	<p>The SMF has been amended to include an additional paragraph to reflect this comment:</p> <p>"The delivery of the new link between the airfield masterplan area and this SMF should be comprehensively planned wherever possible so as to share the same environmental principles and continuity of design".</p>
Natural England	<p>Page 59 'Play provision': The masterplan framework should make direct reference to the provision of natural play areas in addition to NEAPs/LEAPs, trim/play trails, MUGAs etc. Natural play can be incorporated within semi-natural spaces such as the SANG.</p>	<p>Text updated p79 to state "opportunities should be sought to include provision of natural play areas incorporated within the SANG"</p>
Natural England	<p>Page 60 'Biodiversity enhancement and net gain': The masterplan framework must clearly set out what will be delivering SANG and what will be delivering Biodiversity Net Gain (BNG), ensuring that rules around additionality are followed. Current Government guidance is that mitigation / compensation (for protected species or impacts to designated sites, e.g. SANG) can contribute towards 'no net loss' but at least 10% of BNG needs to be through additional measures.</p> <p>The government recently published new guidance for Biodiversity Net Gain, alongside the laying and publication of secondary legislation. The link to the Government guidance page for Biodiversity Net Gain has recently been updated. The Department for Levelling Up and Housing Communities has also published the draft BNG Planning Practice Guidance, which covers further technical and legal aspects.</p>	<p>No change to the SMF is planned in response to this comment as it is beyond the scope of the SMF document. It is for applicants of future sites as part of their planning applications to set out their BNG proposals and where relevant detail how these relate to the provision of SANG.</p>
Natural England	<p>Page 69 'Car parking': The masterplan framework should consider innovative designs for car parking spaces, such as the use of permeable paving or Grasscrete (e.g. Greenconcrete (schotterrasen.at). The use of permeable paving could improve placemaking, urban greening and drainage and be integrated with tree planting. See Grasscrete car park at Farmleigh, Dublin   Grass Concrete   ESI External Works (externalworksindex.co.uk) for an example.</p>	<p>No change is proposed to the SMF in relation to this comment as it is beyond the scope of the SMF document and more appropriately incorporated into the requirement for a design code.</p>
Natural England	<p>Page 90 'Policy DM16 Sustainable Drainage Systems (SuDS)': The masterplan framework should directly reference the recent review of Schedule 3 to The Flood and Water Management Act 2010, which recommends that all relevant development should include SuDs.</p> <p>Policy DM16 is taken from the recently adopted Epping Forest District Local Plan and includes the statement that 'the Council will encourage the use of green, brown and blue roofs'. The North Weald Bassett strategic masterplan framework should consider a proportion of the built- form roofs being biodiverse green roofs, to aid with achieving urban green infrastructure targets, sustainable drainage and biodiversity, e.g. on public buildings, bus stops etc.</p>	<p>No change is proposed to the SMF in relation to this comment as it is beyond the scope of the SMF document and more appropriately incorporated into the requirement for a design code and as part of future planning applications.</p>

Natural England	<p>Page 91 'Water management (W.4.5)': East Anglia has been designated as an 'area of serious water stress'. In some parts of the region, there is evidence to indicate that groundwater abstraction to meet current needs is having an adverse effect on the natural environment, including water dependent designated sites and supporting habitat.</p> <p>The masterplan framework should consider whether water resources to meet the needs of the proposed development alone, and in combination with other proposed development, can be supplied sustainably and without adverse impact to statutorily designated sites and wider ecology, in accordance with relevant Local Plan policies. Consideration should be given to endorsing improved standards for water efficiency within the masterplan framework area, e.g. advocating that new development within the masterplan area should provide a water efficiency standard beyond the current 110 litres per person per day (l/p/d).</p>	No change is proposed to the SMF in relation to this comment as it is beyond the scope of the SMF document and more appropriately incorporated into the requirement for a design code and as part of future technical design in consultation with the water authorities.
Natural England	<p>Page 100 'Green corridors': Care should be taken to minimise the impact of lighting on bat species along the proposed green corridors, as these green corridors will be key commuting routes for the bat species identified on site and in particular within St Andrews Church. The masterplan framework should make specific reference to a requirement for bat sensitive lighting along green corridors.</p>	The need for lighting of these Green Corridors is specifically addressed in the implementation section of the SMF. However an additional sentence is added to this section to make this cross reference and to state for those corridors where lighting is required and in proximity to development lighting design should take account of identified bat species informed by species surveys: "Figure 7.4 in section 7 sets out the overarching design guidance for the delivery of these green corridors, including relating to lighting. Where species surveys indicate these green corridors are used by bats for foraging and commuting, lighting design relating to these green corridors and / or in proximity to these corridors should take account of identified bat species informed by bat surveys.
NWBPC	<p>Various pages – Please ensure the correct wording is used when referring to Vicarage Lane, by adding 'West' to the end where relevant. There are two Vicarage Lanes in the Parish – Vicarage Lane West and Vicarage Lane East.</p>	All instances updated to state, where applicable, "Vicarage Lane West" rather than "Vicarage Lane".
NWBPC	<p>It is suggested that wording should be included to clarify that North Weald Bassett is a civil Parish, however for the purposes of the Strategic Masterplan Framework document, North Weald Bassett refers to the village of North Weald.</p>	Text updated on p14 to state that North Weald Bassett is a civil parish and a village. Other text refers to North Weald Village.
NWBPC	<p>Page 16 – final paragraph – Please add North Weald Village Hall as this is missing.</p>	Updated text on p16 to include North Weald Village Hall
NWBPC	<p>Page 19 – Figure 3.8 – remove reference to the religious part in the Village Centre Hub, as the Methodist Church has now closed. Reference to this should also be removed from the second bullet point on the same page.</p>	Updated text and figure 3.8 on p19 to remove the Methodist Church
NWBPC	<p>Page 19 – Figure 3.9 – can you add a section of Woodland on Weald Common following the planting of over 2,000 trees.</p>	We understand this to be The Weald Common Tree Project, where 2,400 trees have been planted, and is a welcome addition to the village. They are, however, not mature and therefore not appropriate to add them to the plan showing mature woodland, however we will note them on the figure.
NWBPC	<p>Suggest removing comment on page 22 (last paragraph) that Epping Underground Station is around a 10 minute drive/bus ride from North Weald Bassett. This would not be correct if travelling during Peak times, specifically school drop off and collection times. Suggest this is changed to a 'distance' and not a time.</p>	Text updated on p26 to state 5km distance (by vehicle) rather than journey time
NWBPC	<p>The Lower Forest SSSI is within a 2km distance from the SMF area, and as such this should be included in the first paragraph on page 24 regarding ecology.</p>	Text updated on p29 to state "The Lower Forest Site of Specific Scientific Interest (SSSI) is within 2km distance of the SMF area"
NWBPC	<p>The Parish Council is pleased to see the four character references on pages 26 and 41 of the SMF document, namely discrete village-like feel, the Airfield, connections to the countryside, and a rich local history</p>	Noted. No change required to SMF
NWBPC	<p>Suggest removing the methodist Church on page 27, albeit the building still exists at this time but is now permanently closed.</p>	Image and text updated on p33 (formally page 27) to show the local shop/newsagents at Tylers Green in place of the now closed Methodist Church
NWBPC	<p>The picture of the High Road on page 27 is actually a picture of Church Lane – this should be changed.</p>	Image updated on p33 (formally page 27) to an alternative photo of the High Road
NWBPC	<p>Weald Common – a large open expanse of green space, including a play park, and football pitch, and a large area of tree planting – is a well-recognised and used area of green space, within which a new Sensory Garden is currently being created, however this is not mentioned anywhere on page 30 under the 'Communal Green Space' heading. This should be included.</p>	<p>Updated text on p36 to reference Weald Common.</p> <p>remove repeated words - "a large"</p>
NWBPC	<p>On page 31, figure 3.25 shows four areas within the village across four timescales. The image and text relating to the 1970 to circa 2000 is incorrect. The image is from within the Blenheim Development itself, which was not created until after 2005, and the block map also shows the Blenheim development. This therefore giving an incorrect picture of development between 1970 and 2000 and should be amended accordingly</p>	On p36 (formally page 31) the text for the period 1970-2000 refers to the "edge of Blenheim square", which is noted as post-2000. Image has been replaced.
NWBPC	<p>The Parish Council is pleased to see that the sensitive edges along Queens Road and Oak Piece have been recognised on page 35.</p>	Noted. No change required to SMF
NWBPC	<p>The Parish Council supports the statement on page 36 which states that the SMF should not result in a loss of privacy or light for existing residents.</p>	Noted. No change required to SMF
NWBPC	<p>The Parish Council is pleased to see that the Design Guidelines, funded and created by the Parish Council and the Neighbourhood Plan Steering Group, has been referred to and recognised at various times throughout the SMF document</p>	Noted. No change required to SMF
NWBPC	<p>The Parish Council is pleased to see that the hedgerow / tree belt along the boundary of the site and Blackhorse Lane should be retained (page 37). This is to protect current residents of Blackhorse Lane. It should also be pointed out at this stage that the Parish Council would not support vehicular access to the site from Blackhorse Lane.</p>	Noted. No change required to SMF
NWBPC	<p>It is unclear why a section of Beamish Close has been included as a primary street loop / public transport link on figure 3.37 on page 42. This figure is headed up 'Combined Opportunities', however the continuation of this vehicular access to St Andrews School should not be classed as an opportunity, but an existing problem. It should also be noted that there is no key for the purple zig zag line identified on figure 3.37.</p>	Agree that Beamish Close is not a primary street loop / public transport link; grey line has been removed to reflect this. Key has been updated to include purple zig zag "sensitive edge".



NWBPC	The first paragraph on page 48 should be amended, as although the Local Plan was for a 15 year period, we are already 6 years into this time frame, thus the wording stating 'over the next 15 years' is incorrect and should be amended.	Text on p56 updated to "up to 2033 and beyond".
NWBPC	The Parish Council is pleased to see references to the Neighbourhood Plan Steering Group work in the General Themes for the Masterplan area on page 53.	Noted. No change required to SMF
NWBPC	As a general principle (taking into account the Position Statement published by the Parish Council in January 2024 and as referenced earlier in this response) the Parish council supports the general design and principles of the Masterplan Area, specifically in terms of access and its relationship with the current village of North Weald Bassett.	Noted. No change required to SMF.
NWBPC	Page 59 references the sports pitches that are proposed. Consideration should be given to how and where sports clubs and groups would park when using these facilities. This would also be extended to the MUGA. Improvements in sports pitches will often mean more games played, and the potential for league matches with visiting teams and associated spectators needing to have a place to park.  The SMF does not adequately explain how this would be accommodated, or state that applications will need to show how this will be accommodated. Without this, vehicles would park on local streets, which would be unacceptable. It would be short sighted to assume that all visitors to the Sport Pitches and MUGA will be local only. This needs to be considered.	Updated text p78 to state "Consideration should be given to how and where sports clubs and groups would park when using these sporting facilities at detailed design stage."
NWBPC	The Parish Council supports the proposed modified and stopped-up footpaths as detailed on page 61.	Noted. No change required to SMF
NWBPC	The Parish Council supports the proposed restrictions to Byway access for Byways 78 and 83 as proposed on page 67.	Noted. No change required to SMF
NWBPC	Page 69 briefly addresses the matter of Car Parking, suggesting that consideration should be given to lower level of car parking provision. So far there is insufficient evidence that a sufficient improvement to the public transport network (buses) will be made to warrant a lower level of car parking across the new development. Real consideration should be given to the village's proximity to Epping Underground Station, and the times at which commuters who travel into London to work will want/need to travel. Without a reliable, frequent, bus service catering for said users, they will want to drive, and this should be taken into account.	Text on p88 updated to state "Where appropriate, opportunities for a lower level of car parking provision should be considered, subject to policy requirements (as of 2024 ECC are reviewing their parking standards)"
NWBPC	With regard to the provision of a Traveller site, evidence suggests that both the settled community and the gypsy and traveller community, prefer a degree of separation. As such, should it be deemed necessary that a traveller site is required within the development, both community groups should be respected. This is addressed on page 76, however the proposed illustrative layout in figure 5.21 should be altered to show access directly to the right as you enter from the A414.	Indicative masterplan for SMF (including traveller site area) updated to show how access could potentially work. Figure 6.22 updated to be indicative only. This plan was based upon local govt. guidance (but for a different region, previous govt. guidance was withdrawn). SMF wording has been updated to state that 'Future planning applications will determine the precise location and siting of the traveller pitches which are expected to be in either of these two broad locations.'  Deleted the words within the SMF that relate to 'either location is accepted'. New sentence added: 'Future planning applications will determine the precise location and siting of the traveller pitches which are expected to be in either of these two broad locations.'
NWBPC	The Parish Council supports the proposed location of the new retail centre, and the community elements	Noted. No change required to SMF
NWBPC	The Parish Council is pleased to see on page 73 that land has been reserves for new health care facilities. However, the Planning System is such that whilst a developer is required to provide a building, they are not required to provide the service itself. This is not the fault of the developer, but the planning system as a whole. The Parish Council will expect to see sufficient provision of actual healthcare facilities as part of this development, and EFDCs engagement with the Integrated Care System to confirm they will provide suitable and adequate healthcare facilities.	The mechanism for securing health provision is set out in Figure 8.1 of the SMF, which will be subject to a future S106 agreement. Therefore, no further change is proposed to the SMF.
NWBPC	In terms of the local centre community element, the Parish Council feels that any community facility should be owned and managed by the Parish Council as a neutral, non-faith based body, to ensure inclusion with all faiths in the community.	The SMF cannot make commitments to the future owner/occupier of the community building.
NWBPC	Reference to the Methodist Church should be removed from Figure 5.17.	Text updated on figure 6.17 to remove Methodist Church
NWBPC	In terms of heights as detailed on pages 84-85, the Parish Council supports to provision of maximum 2 storey dwellings on the periphery and sensitive edges of the masterplan area, however is slightly concerned that the higher 2-3 storey dwellings would be located on the higher parts of the development site, and the visual impact this would have	This comment is noted, however, the three storey element will be limited, as set out in the parameter plans, and visual impact will be considered through future applications as part of various site surveys, including a Landscape and Visual Impact Assessment. No change required to SMF.
NWBPC	In terms of the design of buildings, reference should be made to the Design Guidelines as created by the Parish Council for design influences, to ensure that the built form is representative of the 'village feel' so treasured by current local residents, and accepted throughout the document as being a characteristic of the village. House design should be traditional in nature, with some modern sustainability elements included, however not so much so that the new development is clearly distinguishable from the current village, created a degree of separation.	Introduction text on p114 updated to include "and should also consider the Design Guidelines for North Weald Bassett document (AECOM, 2019)". The approach to future architectural design detailing is beyond the scope of the SMF document and more appropriately incorporated into the requirement for a design code and as part of future technical design. However, the comments about maintaining a village feel are noted and are encapsulated throughout the SMF.
NWBPC	Page 113, under 'Community Facilities / hub', has the Parish Council listed as being the body responsible for the delivery, however this is not correct. The Parish Council fully supports the one-year option for the Parish Council to consider if it wishes to have the freehold interest in the site (and building), however the Parish Council is not responsible for its delivery.	Updated text p133 to state "Developer of site R3"
NWBPC	Page 114, under 'Upgrading of Memorial Playing Field', has the Parish Council listed as being responsible for the delivery. This is incorrect. The Parish Council does not own this land, which is in fact the responsibility of the Queens Hall Charity. Whilst the Parish Council may choose to assist the Queens Hall Charity with elements of work, it is not the responsible body, and the Parish Council should be removed.	Updated text p134 to state "Developer of site R3 or other body as agreed (through determination of planning applications)"

NWBPC	Church Lane - The Parish Council is pleased to see that the issue of Church Lane being used as a rat run is recognised, specifically on pages 21 and 68. This is a concern for the Parish Council. The Parish Council feels that the proposal as suggested on page 70 in terms of linking up Merlin Way with Epping Road should be further explored, as this would provide a possible solution to the rat run issues along Church Lane and Wellington Road.	The link between Merlin Way and Epping Road has been explored in the North Weald Airfield Masterplan and the severance maintained to avoid a through route that could be utilised by HGV traffic. The airfield masterplan identifies to opportunities to explore closure of Church Lane to through traffic to provide a traffic calmed route.
NWBPC	Flooding - Councillors are concerned that the surface water run off will be directed into Cripsey Brook. Wording on page 25 of the SMF document (under the Pluvial flood risk heading) states that surface water run-off will be restricted to the pre-development greenfield rate for the 1 in 1 year rainfall event with the drainage system and attenuation features sized to accommodate all storms up to and including the 1 in 100 year event plus a climate change allowance. It also states that this means that in larger storms, the future rate of run-off will be reduced, resulting in a betterment to the receiving downstream infrastructure. Whilst not experts in drainage matters, this wording seems to suggest that generally there will be no change to the average day to day run off rate from the masterplan area as is currently the case with the site being agricultural fields. The Parish Council is very concerned about this, as currently the flooding associated with various sections of Cripsey Brook (most notably along the A414 near the Vojan Restaurant situated in the Ongar Parish) is already a regular problem, and the Parish Council feels there is an opportunity to make improvements to the day to day run off rate from this area as part of the development proposals. It is suggested that wording should be included to state the Council will expect to see evidence of an improvement in the day-to-day run-off rate. This is also relevant to pages 60 and 61 of the document. The Parish Council feels it is not acceptable to say that the run-off rate should be 'no greater than the existing run off rate', as this is already causing a problem further along the line.	The SMF wording sets out that run-off from the SMF area will be controlled and in high rainfall events will be reduced compared to the current situation. Subsequent planning applications will be subject to Flood Risk Assessments.
NWBPC	St Andrews School - As a direct result of discussions between the Neighbourhood Plan Steering Group, the Parish Council, and the developer of the largest parcel of land within the masterplan area, consideration was given to expanding St Andrews School rather than the creation of a new school. However, this was on the proviso that a vehicular entrance with drop off points to the school was created to the north of the School (in parcel number 7 as referred to in figure 3.26). The rationale for this was that the current parking issues experienced by residents in School Green Lane, Beamish Close and Blackhorse Lane on a day-to-day basis at school drop off and pick up times should not be exacerbated. The text on pages 32 and 67 suggests that the only northern access to the School is the potential for a bus/coach drop off. If this is the case, the Parish Council would not support the expansion of St Andrews School. It is understood that there is a push for people to walk their children to school, and it may be that some of the residents in the new development will do this, however if St Andrews School was expanded without the option for vehicular access from the north, the current problems would undoubtedly become even worse that they are now. The Parish Council feels that in this case, the best solution may in fact be to have two schools - the new school located on the site reserved within parcel 6 on Figure 3.26. This could then be multifaith. However, there should be consideration given that the same parking issues would not occur on Queens Road if this new school was built. This matter is further addressed on pages 75.	P86 of the SMF states that "and potential for new pedestrian accesses on its northern edge, on the boundary with NWB.R1 development area "Added text on p38 " along with new pedestrian/cycle accesses". Parking on Queens Road is relating to future management, if land is required for the new school, rather than a matter for inclusion in SMF
NWBPC	Cycle Access - Applications should be required to demonstrate that provision is in place to stop motorised bikes and quad bikes from using the new Cycle Routes proposed throughout the development, especially to and from their access points. This is already an issue in the village at numerous locations (including the Memorial Playing Fields) and must be addressed as part of the SMF. In addition, the proposals on page 65 talk about cycle integration with the existing village, with figure 5.11 identifying blue arrows showing these routes. The reality of the situation is that most the current roads in North Weald village are not designed, nor are they suitable, for cycling. As such, what we will be left with is a great cycle provision within the new development itself, without any improvements to cycling provision outside the development. This is a matter that must be addressed by both EFDC and ECC, as without these external improvements, the cycling strategy as identified will not work to areas outside the new development.	The use of motorised bikes/quads is a detailed issue that can be reviewed at a later stage, if these issues still occur. There is a significant character change to deter anti social issues in and around the site. Wider routes beyond the SMF area will be considered as part of mitigation measures for any future planning applications.
Thames Water	Comments on all sites in allocation. The scale of development/s is likely to require upgrades to both the wastewater network and sewage treatment infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development.	To be addressed at detailed application stage. The need for appropriate infrastructure upgrades are acknowledged within the SMF.
Hertfordshire & West Essex Integrated Care Board (NHS)	In reviewing the Primary Care Network (PCN) data and as explained in full in the next section, North Weald Surgery will be unable to accommodate the additional patient numbers arising from this development. All options have been explored, with the HWE ICB concluding health infrastructure in the form of on-site provision for a new medical facility will be needed to accommodate additional patient numbers arising from this development alone. Given this identified need for a new medical facility, developer contributions would need to cover serviced land and/or a developer contribution, plus developer contributions from the four development sites yet to come forward.	The SMF has identified the need to allow for onsite health provision and contributions and made space allowance for this. Detailed matters regarding implementation are to be dealt with at planning application stage.
Hertfordshire & West Essex Integrated Care Board (NHS)	The HWE ICB has undertaken an optioneering process for North Weald Surgery and has concluded that the option to re-configure the surgery will not be sufficient to accommodate the increase in patients' numbers arising from this scheme alone. As such the HWE ICB will require new health infrastructure in the form of a new medical facility.	The SMF has identified the need to allow for onsite health provision and contributions and made space allowance for this. Detailed matters regarding implementation are to be dealt with at planning application stage.

Harlow and Gilston Garden Town	There does not seem to be a way for a linked bus service to directly connect the two masterplan areas, which is regrettable.	Bus routes are being explored with ECC and the SMF does not preclude this.
Harlow and Gilston Garden Town	It is important that long-lasting improvements to the existing 420/420A bus services to Harlow in addition to direct new services are secured. Any future planning application would need show how the existing village and new developments comprising the wider Masterplan area will be adequately served by frequent bus services, (potentially via a bus service agreement for the new routing and financial contributions towards subsidies,) and consider the positioning of future bus stops so that they would be within walking distance of all of the new development.	Bus routes are being explored with ECC.
Harlow and Gilston Garden Town	Given that the North Weald Bassett Masterplan development proposed does not encompass a secondary school, and that it is unlikely that there would be much presence of health facilities on site, it would be helpful for the SMF to demonstrate how it might connect to destinations and facilities by sustainable travel. The site is within the proposed catchment of the new secondary school at the Latton Priory in addition to Latton Priory making provision for healthcare facilities within the proposed local centre.	Health facilities are proposed at NWB and connectivity to the Latton Priory secondary school is being explored with ECC.
Harlow and Gilston Garden Town	Bus services will need to be improved, including the likely need for a direct service from North Weald Bassett to Latton Priory rather than routing via Epping. Active travel links on existing, new or upgraded PRoW to the strategic site allocation at Latton Priory would also be beneficial. Current road links allow cycle connections within 20 minutes.	Bus routes are being explored with ECC.
Harlow and Gilston Garden Town	The SMF aims to create a 'well-connected 15 minute social neighbourhood with excellent walking and cycling links.' Not all of the existing PRoW network is shown within the document. It does depict how the SMF site might connect to the Airfield. Figure 5.11 (below) shows an indicative pedestrian/cycle link 400m/ 5-minute walk to/from airfield masterplan. This should be LTN 1/20 compliant, the route shown below appears too narrow, the pedestrians are standing on the verge to let the cyclist pass.	Noted
Harlow and Gilston Garden Town	The SMF shows this western link will run through an area of SuDs and SANG. It is important that it can be used 24/7. safely so lighting and natural surveillance opportunities should be considered. It also passes the WWTW, this may be less than desirable odour.	Noted
Harlow and Gilston Garden Town	The SMF should reference Essex Net Zero Policy   Essex Design Guide specifically as this was published in November 2023 and is more up to date than the generic Design Guide sustainability objectives.	This document does not seek to duplicate all applicable policy and guidance.
Harlow and Gilston Garden Town	It is important that transport modelling in support of both applications considers the cumulative impacts of traffic movements on the local and also strategic road network. J7 M11 is already a busy junction and National Highways views in addition to ECC's should be sought. It is likely that detailed modelling will be required. The results of which will be shown in Transport Assessments accompanying the planning applications. Such modelling work should ideally be joined-up and reflect cumulative traffic flows of movements arising from allocations E4.A North Weald Bassett Airfield, NWB North Weald Bassett, and the HGGT strategic site allocation SP4.1 Latton Priory, to ensure that none of the local strategic development sites' transport movements compromises the deliverability of the other sites and that there is no serious harm to the LRN or SRN. It is understood that whilst the developers are engaging with ECC, there is only limited dialogue directly between them.	Discussions are ongoing between developers, ECC and National Highways regarding upgrade works to J7 of the M11.
Landowner of sites NWB.R1 and NWB.T1	<p>Many thanks for the opportunity to participate in the consultation for the Strategic Masterplan Framework for North Weald Bassett. These representations are made on behalf of Mr Martin Eldred, landowner of sites NWB.R1 and NWB.T1, which form part of the North Weald Bassett Masterplan Area (NWBMA). We very much welcome the North Weald Bassett Strategic Masterplan Framework (SMF), produced by Vistry, who control the largest portion of the masterplan area and we note the document has been produced in conjunction with and liaising with Epping Forest District Council (EFDC) and Essex County Council (ECC), through a Planning Performance Agreement (PPA). Whilst this document and its progress is welcomed, there are a number of issues and amendments which need to be made to this document. These are issues which have likely come about through producing the SMF without the full involvement of all landowners who make up the SMF area.</p> <p>My client's land extends to approximately 7.35 hectares and is allocated for approximately 223 of the 1,050 dwellings within the North Weald Bassett Masterplan Area plus five traveller pitches. The site is expected to deliver approximately 20% of the dwellings within the masterplan area and essential policy requirements. The Local Plan envisages delivery of the dwellings on my client's land commencing in 2025 and completing in 2031 the traveller pitches to be delivered by 2027.</p>	Noted
Landowner of sites NWB.R1 and NWB.T1	<p>Play spaces</p> <p>We understand that the SMF proposes 1no. LEAP within site NWB.R1. However, the site has been considered and designed to incorporate 2no. LAPS, with one likely in the north-east corner of the site (together with a school drop-off point, providing a localised hub for site R1) and another proposed at the southern corner of R1, providing a buffer to existing properties on Blackhorse Lane. The provision of 2no. Laps (as opposed to 1no. LEAP) is considered an acceptable approach, given the close proximity of all parts of NWB.R1 to the existing play facilities at Memorial Playing fields. Any new LEAPs may 'compete' with the existing memorial play facilities and we would instead look to enhance the existing play facilities through s106 contributions.</p>	The design proposals for site NWB.R1 have not yet been shared with EFDC so it has not been possible to consider the proposals in detail at this stage. Play space within the SMF has been distributed at suitable distances and also with consideration to site NWB.R2. The proposals to enhance the existing facilities within the Memorial Playing Fields are listed in the infrastructure delivery schedule within the SMF. The exact nature of future play space provision will be subject to individual planning applications.
Landowner of sites NWB.R1 and NWB.T1	<p>Potential bus stop locations</p> <p>It is stated (page 57 of the SMF) that "all new homes should be within circa 500m of a bus stop or the mobility hub. The new homes will also be partially served by existing bus stop catchments". More is provided on this below, but the SMF is not clear on how site NWB.R1 would be served by buses, in terms of either the proposed bus route or in terms of the location of a new bus stop.</p>	Bus networks and routes have not yet been specified but the SMF confirms that the approach is to ensure stops are in suitable proximity to all new homes.

Landowner of sites NWB.R1 and NWB.T1	<p><b>Green and Blue Infrastructure</b></p> <p>The Illustrative and Indicative Green and Blue Infrastructure Framework plan, shown at Figure 5.4, shows three SUDs ponds/ basins along the northern boundary of site NWB.R1. Indeed, it is stated that “Figure 5.4 shows the illustrative location of the strategic storage features, taking account of the existing topography. These storage features provide an opportunity to create localised amenity spaces associated with these features and for several of these to be focal points such as pocket parks or local greens. These spaces also provide an opportunity to create ecological habitat and enhance the visual appearance of new development”.</p> <p>However, following an independent assessment by a third-party consultant on site NWB.R1, it is apparent that one single SUDs basin will be adequate for this site (albeit larger than previously shown), in the north-west corner of NWB.R1. This would be complimented by use of swales throughout the site, located along existing hedgerows, where there are existing ditches, and which would lead to and feed the one SUDs basin. As such, any SMF parameter plans and figures need to be corrected accordingly.</p> <p>This section of the SMF also refers to the provision of play space within NWB.R1, which is already discussed and addressed in the comments above. It is acknowledged and agreed that “The majority of trees and hedges are to be retained and there are opportunities to restore historic hedgerows with new native species planting reinforcing the green corridors across the area. The pond within the SMF area will benefit from restoration”. It is assumed that the pond referred to is that on the southern boundary of NWB.R1 and this is indeed agreed, as it is intended to retain, improve and enhance this existing feature, as part of the proposals for NWB.R1.</p>	This comment is agreed and it is important that the SMF allows flexibility having regard to the future detailed design of SuDs and drainage strategies. Text additions confirm that storage basins are indicative only. Text added on collaborative approach, stating that "where neighbouring developer/land owner boundaries exist, a collaborative approach should be undertaken to ensure that the principles outlined within the SMF are retained."
Landowner of sites NWB.R1 and NWB.T1	<p><b>Access and Movement</b></p> <p>Within this section, the access to the site as a whole is discussed and outlined within the SMF. It is stated that “A new roundabout on the junction of the A414 and Vicarage Lane will enable public transport to enter and leave the site. The bus route will loop through the site to Vicarage Lane West, serving the Social Heart (including the local centre, Memorial Playing Fields and St Andrew's primary school), and the SANG natural open space on the western side of the SMF. Opportunities existing for buses to leave the A414 in advance of the roundabout in order to serve the eastern half of the development providing for greater bus penetration into the heart of the residential before continuing the loop described above”. (emphasis added). This section is welcomed, as it is considered that it would make logical sense for a potential new bus route to use the proposed access into site NWB.R1 from the A414 and then onto NWB.R3 and the primary loop as shown/ proposed. In addition, it is also noted that this section states “This primary vehicular access at the junction of the A414 and Vicarage Lane will place the majority of traffic generated on the strategic network (rather than the High Road), and enable a reduction in vehicular speed along a section of the A414, improving pedestrian crossings of the A414.” (emphasis added). Again, this is welcomed and is agreed with by the landowner and representatives of site NWB.R1. A section of the A414 will become ‘book ended’ by two roundabouts (the existing and the proposed), with the access to NWB.R1 in between and the southern side of the A414 will become residential in character. Combined, this will naturally reduce car speeds and so a reduction to the speed limit along this stretch of the A414 is surely inevitable and desirable. Measures to make the stretch of the A414 between the existing and proposed roundabouts a safer environment for pedestrians and cyclists is essential and a failure to do so will lead to car dependency. A good precedent is the highway arrangement at the western approach to Ongar, where a speed reduction to 30mph, footways, crossings, and bus stops create better driver-pedestrian awareness. A similar arrangement is essential to respond to the change in the nature of the area resulting from the development and to achieve the significant level of modal shift sought by part F of Policy P6 and the highway authority. However, we wish to raise a number of concerns and objections to the draft ‘Access and Movement Framework Plan’ shown on page 62 of the SMF, at Figure 5.8.</p>	Noted
Landowner of sites NWB.R1 and NWB.T1	<p><b>Access from to NWB.R1/T1 from A414</b></p> <p>Firstly, a blue arrow is shown to indicate the access to NWB.R1 from the A414 and is labelled ‘Temporary NWB.R1 vehicular access and potential future public transport use’ in the key. It is noted that there is a small section dedicated to this access on Page 98 of the SMF, ‘A414 Access to NWB.R1’. In respect of the key, the limitation to construction vehicles only does not accord with the position we have agreed with EFDC and ECC in August 2023. This is that site NWB.R1/T1 would be served by a direct access from the A414 for all vehicles and all movements, provided that its use ceases once the link between R1 and R3 is delivered. EFDC agreed that this should be shown on the Masterplan and this was explained to Vistry via email on 03-08-23 and copied to EFDC and ECC. Appended to this letter is a note of the meeting on 1 August 2023 and the email correspondence referred to above. Whilst difficult to know the best form of words, we believe the following would more accurately reflect what was agreed with EFDC and ECC than the wording currently proposed, which limits the use of this access to construction and public transport only:</p> <p>“Vehicular Access (use to cease once vehicular link with NWB.R3 is operational, save for potential future public transport use and/or for Gypsy and Travellers site, depending on its final location).” This was put to Vistry before the final SMF was submitted to EFDC (at least this is what we were informed), however, this amendment was not implemented or actioned for some reason. For the avoidance of doubt, we do not object to the proposed roundabout. We object to the reliance on it as the only permanent means to access site NWB.R1/NWB.T1 as this is not deliverable and misses the sustainability benefits of a direct A414 access and pedestrian crossings into site NWB.R1/NWB.T1 to satisfy part F of the policy, deliver the school improvements and provide a bus route.</p>	The key to the access and movement framework drawing states only 'Temporary NWB.R1 vehicular access and potential future public transport use' and does not reference construction traffic. The travellers pitch section of the SMF identifies the need for road access to the A414 and this arrangement will be subject to where the travellers pitch is proposed.
Landowner of sites NWB.R1 and NWB.T1	<p><b>Pedestrian/ cycle Links through NWB.R1</b></p> <p>The Access and movement Framework shows an important east-west pedestrian and cycle path through NWB.R1, mainly long the southern boundary and then leading through to NWB.R2. We agree with this in principle, and it will be incorporated into the proposals for this site. However, Figure 5.8 also shows another pedestrian path leading into R2 (shown as a yellow dotted line). It is questioned if this is needed and what its purposes is, if the main east-west link is already provided.</p>	The north-south route shown maintains the existing Footpath 93 Public Right of Way route although adjusted to accommodate the development proposals.

Landowner of sites NWB.R1 and NWB.T1	<p><b>Bus route and Bus stop</b></p> <p>It is noted that the Access and Movement Framework Plan shows a thinner/ smaller blue dotted line into site NWB.R1 from R3, indicating a bus route leading from the primary road/ bus route and an indicative bus stop towards the centre of the site is also shown. It is also stated that "To provide access to the R1 site, it is proposed that an access road is created from the spine road running through R3. This road through R1 would also be 6.75m being designed to be suitable for buses and an access for coaches to St Andrew's Primary School utilising a new bus/coach drop off-area on the southern edge of R1 to alleviate traffic on School Green Lane and Beamish Close." (Page 69 of the SMF). Whilst we have not approached bus operators yet and so we do not know their opinions on this matter, this would not seem to make logical or practical sense, to have a bus enter NWB.R1 only to then turn around and re-join the primary route within R3. In addition, an indicative location for a school coach/ bus drop-off point is shown via an orange dot.</p> <p>However, the bus route and bus stop do not reach or correlate with the proposed school drop-off point. Both a bus route, a bus stop and a school drop off point within NWB.R1 are supported in principle, however, the Framework plan(s) should be amended. As has been indicated in comments above and indeed indicated within the SMF, the direct access to NWB.R1 from the A414 should be retained permanently for buses (and potentially for all users) which could then operate and run through R1 and lead to R3 to continue the loop as shown. We would also suggest that a joint bus stop and school drop-off point could be provided towards the north-east corner of the existing school and directly south from the A414 access. Combined with a LAP this would provide a small, localised hub for site NWB.R1/T1, with easy, direct access from there to the school. This would also collate with PROW 'North Weald Basset 93' (which would be re-aligned as part of the proposals for NWB.R1/T1) and the direct walking route/ desire-line for residents and pupils accessing the school from the existing residential area to the north of the A414.</p> <p>This is partially acknowledged at page 70 of the SMF ('Public Transport') whereby it states "In all likelihood bus services would be able to enter the development earlier, allowing for greater penetration by utilising a left slip off the A414 through site R1". As such, the SMF seems to acknowledge that the best option would be for a bus route to be via the A141 access into and through the NWB.R1 site, however the Framework Plans need to better and more accurately show and reflect this proposal.</p>	The Access and Movement Framework Plan is indicative and does not preclude the more detailed design solution suggested. It should be noted that any northern access to the school should remain prioritised for walking, cycling and public transport and not encourage ease of general vehicle drop-off and pick-ups given the traffic congestion this may generate.
Landowner of sites NWB.R1 and NWB.T1	<p><b>Additional Pedestrian Crossing over A414</b> The Framework Plan at Figure 5.8 shows a 'Proposed A414 pedestrian crossing' immediately to the east of the proposed main roundabout. We would also strongly urge that another should be provided across the A414 within close proximity to the access to NWB.R1 site, to serve the existing PROW NWB 93 which crosses the A414 in this location. This would serve the existing residential area to the north of the A414, providing both better lines of access, by active modes of travel (walking and cycling) and also providing a better 'social link' between the proposed site and this existing area, which is partially detached from the village. This is a well-used footpath on a clear desire line between existing residential development to the north and services and facilities within the existing village centre. It is illogical to provide a crossing where PROW NWB 36 crosses the A414 but not PROW NWB 93.</p>	Given the status of the A414 the proposed and existing crossings are currently shown at the location of roundabouts where traffic is being slowed. A further crossing is not precluded but would be subject to detailed discussion with ECC.
Landowner of sites NWB.R1 and NWB.T1	<p><b>Pedestrian/cycle integration with the existing village (pg.66)</b></p> <p>Whilst a small yellow dotted line is shown on the Framework Plan, this section does not mention or outline a pedestrian and cycle access at the southern edge of NWB.R1 to Blackhorse Lane. The SMF should be amended to include this access, particularly as it should provide one of the most direct routes from the site to the existing village, the High Road and the existing 'Social Heart'.</p>	A link is shown in the location of the current PROW 93 where it joins Blackhorse Lane.
Landowner of sites NWB.R1 and NWB.T1	<p><b>6 Land use and community infrastructure</b></p> <p>The Land Use and community infrastructure Framework Plan is provided on page 71 of the SMF, at Figure 5.14. The use of a blue star, an indicative location of the Traveller site is indicated on the northern boundary of site NWM.R1. We note that this is the location it is shown throughout the SMF document and other plans. The traveller pitches are a specific policy requirement the Strategic Masterplan must make provision for. Paragraph 5.90 of the Local Plan states that "the precise location of, and access to, site NWB.T1 will be determined through the Strategic Masterplanning process". It is, however, a challenging land use to accommodate within a residential development scheme, hence the Local Plan Inspector included the wording at paragraph 5.90. We have sought advice from EFDC and the Quality Review Panel on numerous occasions, but no advice has been forthcoming. My client has not been involved in the masterplanning process so has not had the ability to provide any input and at this point in time, has not made any decisions in respect of the precise location. An indicative star does not meet the requirement for a precise location and suitable access to it is not shown. The criteria used in the Local Plan site selection work was for sites to be located within 100 metres of a classified or metalled road. It could therefore be located anywhere along the A414 frontage or adjacent to the new roundabout, with suitable access provided. It could not be located as shown, because the temporary access proposed will fall foul of the need for it to be accessible from a classified road.</p> <p>Given the SMF departs from the Local Plan in respect of this, our strong view is that three alternative locations, as per the appended plan, be shown as indicative locations. These three locations are all within 100 metres of either the A414 or new roundabout. The SMF should make clear that each location is only suitable if it has direct access from the road network.</p>	Alternative traveller locations (2 locations now shown on northern edge of A414) added to plans in SMF. The proposed suggested location of the traveller site further south adjacent to the memorial playing fields, has not been taken forward within the SMF, due to concerns regarding neighbouring amenity. It is also considered beneficial for the traveller pitches to be located on the northern edge of the development.

Landowner of sites NWB.R1 and NWB.T1	<p><b>Traveller Pitches</b></p> <p>Under this section of the SMF, at page 76, there is a specific section on 'Traveller Pitches'. It is stated that "Further best practice guidance on traveller pitch design is included in the Essex Design Guide (<a href="https://www.essexdesignguide.co.uk/supplementary-guidance/gypsy-traveller-and-showpeople_guidance/">https://www.essexdesignguide.co.uk/supplementary-guidance/gypsy-traveller-and-showpeople_guidance/</a>). An illustrative layout for a 0.35ha five traveller pitch area is shown opposite but this will be subject to the individual landowner proposal in a future planning application.". It is understood that the Local Plan evidence base assumed 0.5 hectares to provide 5 pitches. Whilst the landowner and representatives of NWB.R1 do not wish to contest this, clarity is required from the Council as to the minimum site area that they consider is required and which is acceptable.</p>	The local plan does not stipulate a site size as it will be dependant on the suitable design solution. An indicative design solution is shown in the SMF.
Landowner of sites NWB.R1 and NWB.T1	<p><b>Heritage Assets</b></p> <p>Surrounding heritage assets are outlined on page 81 of the SMF. Under 'Tylers Farmhouse' there appears to be a typographical error which needs amending. It currently reads 'Grade II timber framed hall house dating to the early 16th Century located in the centre of site R1 and which can be viewed from site R2.....'. However, Tylers Farmhouse is set within R2 and is viewed from R1.</p>	Noted
Landowner of sites NWB.R1 and NWB.T1	<p><b>Density</b></p> <p>Under the section on 'Approach to density' Figure 5.28 provides 'illustrative development densities'. For site NWB.R1 this shows a range of 34-45dph, which would provide for 173-229 homes. This is somewhat welcomed, as it helpfully demonstrates the capacities of the site, bearing-in-mind the site is assumed to deliver 223 dwellings in the Local Plan housing trajectory. Through initial layout and design work, it is noted that 223 dwellings may not be achievable and any upcoming outline application for NWB.R1/T1 will likely be below this figure, but within the range of 173-229 as per the SMF. It is noted that this range is on the basis of the net development area excluding the 0.35ha traveller site. The housing numbers become more challenging should the traveller site need to be a minimum of 0.5ha.</p>	Noted
Landowner of sites NWB.R1 and NWB.T1	<p><b>Heights</b></p> <p>Under this section of the SMF it is stated that "Parts of the SMF area in the vicinity of St Andrew's Parish Church, Church Cottage, Tyler's Farmhouse and White Cottage are restricted to a maximum of 2 storeys to maintain views of and respect the setting of these Listed Buildings. Sensitive edges with existing homes should also be restricted to a maximum of 2 storeys". This is agreed and any proposals for site NWB.R/T1 will seek to reflect this and to be in keeping with/ mirror that shown on the Heights Framework Plan.</p>	Noted
Landowner of sites NWB.R1 and NWB.T1	<p><b>Draft infrastructure delivery schedule</b></p> <p>On page 71 of the SMF Figure 7.1 provides the 'Infrastructure delivery table' and within this it is suggested that the 'mechanism for securing this infrastructure' is "Land to be reserved as part of planning application. S106 to grant an option to acquire on commercial terms the traveller site. Land transfer agreement can include covenants relating to the standards of management/operation of the site. Traveller site to be marketed to traveller community prior to 33% of site R1 occupation". This matter has at no point been discussed with the landowner or the representatives of NWB.R1/T1. We strongly object to this proposal as it is considered too restrictive, and this requirement would be too early in the build-out phases of site R1. This would need to be discussed and agreed between the landowner/ planning consultants submitting the application (s) for NWB.R1/T1 together with EFDC (and ECC?) and it is not for Vistry to comment or dictate the s106 trigger points for this site. To reiterate, the SMF has been prepared without meaningful input from landowner of site NWB.R1/T1. The process has effectively prevented this which is, at best, unhelpful and, at worst, flawed because it has enabled to masterplan to progress to an advanced stage without any certainty that the dwellings and infrastructure requirements expected of my client's site are in fact deliverable.</p>	These details have been removed from the SMF as it is agreed these are subject to future detailed discussion on site specific s106 Agreements.