

Appendix 3 - Statutory Consultee Responses

1. Countryside Properties Plc

1. Introduction

1.1 This response to the North Weald Airfield Masterplan (NWA Masterplan) consultation, which commenced on the 8th December 2021 and closes on the 30th January 2021, is submitted by Strutt & Parker on behalf of Countryside Properties.

1.2 Countryside, control site NWBR3 on land to the north and west of North Weald Bassett (NWB), and to the east of the Airfield, under Policy P6 of the emerging Epping Forest District Council (EFDC) Local Plan. As such, Countryside is committed to working closely with EFDC, and all stakeholders, to ensure that future growth within NWB comes forward in a comprehensive, sustainable, and cohesive manner.

1.3 Within that context, and having reviewed the latest iteration of the NWA Masterplan, Countryside generally support the NWA masterplan document as proposed. This response primarily highlights matters that could benefit from further consideration or clarification, whilst also noting some general observations. The feedback draws, where appropriate, from the work undertaken by Countryside in the progression of the strategic masterplan for the aforementioned residential growth location in NWB allocated under Policy P6 of the emerging Local Plan, from herein referred to as the NWB Urban Extension.

2. Masterplan Document

2.1 As a starting point, it is commendable that there have been a number of positive changes to NWA Masterplan since the last iteration was published in November 2020. An analysis of different elements of the NWA Masterplan is provided within this section.

Biodiversity and Green Infrastructure

2.2 The inclusion of additional green infrastructure, such as the provision of the additional landscape enhancement area to the north of Merlin Way, will undoubtedly provide for greater environmental and place making improvements, bringing the strategy for the NWA Masterplan into alignment with the aspirations for the NWB Urban Extension, where the masterplan framework is principally led by landscaping and biodiversity considerations.

Climate Change

2.3 The reference to the NWA Masterplan site and its role within the UK Innovation Corridor (UKIC) and the Digital Innovation Zone (DIZ) initiatives is also beneficial for gaining an understanding of the intended role for the employment allocation within the wider region and its economy. Likewise, the outline of the aspirations to mitigate against the impacts of climate change as part of the sustainability objectives, including the provision of a new energy centre and the references to achieving Net

Zero Carbon by 2030 and targeting BREEAM Outstanding for all site units, are commendable.

Community Facilities

2.4 Likewise, the desire to retain and enhance the community offering as part of the employment site, potentially through the conversion of the Control Tower, a Grade II Listed Building, is acknowledged. However, it is not particularly clear from the NWA Illustrative Site Layout, or the various other plans included within the Masterplan document, precisely where the community centres and associated uses would be situated or accommodated. It would be beneficial to see a clearer visualisation of how the community facilities and activities are to be accommodated within the site. For instance, the Land Use Framework states that the community and ancillary uses can be located across the development site, and throughout other open spaces around the site, but given the importance of such facilities to local residents, a greater level of detail could be provided.

2.5 Moreover, it would be beneficial to have clarity on the strategic function of the community facility and its composition. For instance, would it compete or interact with a similar facility required of the NWB Urban Extension.

Red Line / Extent of the Masterplan

2.6 Turning to some of the more detailed considerations and observations, it is firstly noted that the NWA Masterplan does not cover the entire NWA Masterplan Area, as shown on the accompanying plan to Policy P6 within the emerging Local Plan. On that basis, it is assumed that the airfield element of the wider site will remain unchanged? Albeit, Policy P6 does establish a requirement to provide a new access from Epping Road to service the west of the site. If the new access is no longer required or proposed, then a statement to that effect would suffice. Otherwise, if it is still intended to provide the new access off Epping Way, it remains important to provide information on how it is going to work. This is because, as will also be discussed below, the cumulative highway impact of new developments in the locality need to be fully understood for the purposes of mitigation and also for the considerations surrounding the Environmental Impact Assessment and the subsequent content of the Environmental Statements.

2.7 Landowners and the community need to have an understanding of the wider plans for the airfield and what effects they might have on existing residents and future developments. We would therefore request clarification on the intended use of the airfield, including the intensity of that use, and whether any change is envisaged as part the NWA Masterplan or not.

Transport & Movement

2.8 Keeping on the theme of highway considerations, as set out within the Masterplan document, the highway impacts of the proposal are causing the greatest concern within the local community in NWB. Subsequently, notwithstanding the recognition within the Masterplan document that highways is a prominent local concern, it would be helpful if the document set out a clearer strategy for how the

highway impacts of the development are going to be limited and mitigated. In particular, the HGV routing / restrictions would benefit from further clarification.

2.9 The consultation events held in January 2022 explained that the majority of HGV movements are expected to access the site from the M11 via the A414, with vehicles exiting or joining at Junction 7. However, whilst the site is very well located in proximity to the strategic highway network, a proportion of the HGVs will inevitably utilise other routes, such as the eastern extent of the A414 to reach other regional centres in Essex and the A12. Therefore, HGVs and other vehicles are also likely to make use of Vicarage Lane and Church Lane, with the latter being a narrow highway, with limited forward visibility at various points, subject to a 60mph speed limit.

2.10 Moreover, even when travelling northwards out of NWB towards the A414 and the M11, it is queried what infrastructure upgrades are planned to Rayley Road in order to accommodate the proposed development and the associated HGV movements. It is a relatively narrow highway and again it is subject to a 60mph. Some further consideration of potential options for restricting HGV movements; deterring use of Church Lane, or making it a less appealing cut-through, and providing additional traffic calming measures would be welcomed. It would also appear that the provision of the proposed roundabout at the junction of Vicarage Lane and the A414, which forms part of the NWB Urban Extension Masterplan, will be important for enabling sufficient access to the site. Agreement on this point, and a recognition of it within the NWA Masterplan, would assist in aligning the approach of the two masterplans and addressing their cumulative impacts.

2.11 It is acknowledged that the previously proposed spine road through the site has been omitted from the NWA Masterplan. This omission seems to have stemmed from a local concern that the spine road would increase traffic within the village, but without an alternative, there will as a consequence be an increase in traffic using the High Road instead.

2.12 The inclusion of a bus route through the NWA Masterplan is positive, however, the proposed route identified in the document is not particularly clear with regards to the onward route once the bus has passed through the employment site. It would be helpful to understand the full route of the bus service, as well as whether it is proposed to be a new service or a diversion of an existing service. There is also an opportunity to explore how the bus route could link in with the proposed bus service for the NWB Urban Extension Masterplan and we would welcome further discussion with the Council on this, such that it can be comprehensively planned.

2.13 Additionally, whilst the current NWA Masterplan principally focusses on the internal area of the site, the EFDC Strategic Masterplanning Briefing Note (2018) states that, amongst other matters, the masterplanning process should seek to achieve the following outcome:

- Ensure that the development is 'front-loaded' and where possible accelerated, so that key planning issues are considered and where possible resolved jointly by all relevant parties prior to the submission of planning applications.

2.14 The EFDC Strategic Masterplanning Briefing Note also establishes the important role of masterplanning in terms of ensuring that the planning and delivery of development and infrastructure is properly coordinated, distributed and timed, yet with the exception of green infrastructure, electricity, and telecoms, there is very limited reference to infrastructure in the NWA Masterplan document.

2.15 Accordingly, the local highway impacts of the proposed employment site will be intrinsically related to the assessment of the future planning applications within NWB, not just for the NWA Masterplan Area, but also for the NWB strategic residential, and so they should be given due consideration at this stage in the planning process.

2.16 Addressing the local concern with regards to Church Lane is also important in the context of the Movement Framework Plan, as two additional pedestrian links to Church Lane are shown to the south of the continuous link between the NWA Masterplan and NWB Urban Extension sites. The two additional links terminate on Church Lane and so it is assumed the pedestrians/cyclists are then expected to travel along the highway in its current format. If this is the case, it is directly relevant to the NWA Masterplan to liaise with stakeholders, including ECC Highways, to consider an appropriate course of action, or a variety of potential options, in terms of introducing traffic calming measures that make it both safer and more appealing for pedestrians and cyclists to use Church Lane.

2.17 On the subject of connectivity, Countryside would suggest that a further link between the two masterplan areas could be provided from the newly proposed area of semi improved grassland/landscape enhancement area, on the parcel of land to the north of Merlin Way, to the northwestern corner of the NWB Urban Extension. The aforementioned landscape enhanced area is in an important strategic position that offers good views over the airfield, so there is certainly a valuable opportunity to make the space a focal point and destination within the NWA Masterplan.

Noise

2.18 A further point that Countryside would welcome clarification on is noise. The NWA Masterplan document explains that the industrial noise impacts of the proposed employment site on noise sensitive receptors (NSRs) would be low for all existing and future NSRs, before then recognising that highway noise impacts are predicted to result in moderate impacts on NSRs along Vicarage Lane in the long-term. It is requested that the evidence base to inform these conclusions be shared with Countryside, as any such noise impacts would have implications for existing residents and the development of the NWB Urban Extension towards the boundary with Vicarage Lane.

SANG

2.19 In relation to the SANG sited between the NWA Masterplan Area and the NWB Urban Extension Masterplan Area, our interpretation is that this not primarily required to mitigate against the impact of other developments within NWB, but instead serves some other purpose. The recent response from EFDC to the Inspector for the emerging Local Plan examination provides some clarity on the position with regards to SANG provision. Notably, the response explains that it is not possible within the

Local Plan itself, or within Page | 6 the adopted Green Infrastructure Strategy, to specify the exact quantum of SANG as this will vary on a case-by-case and the quantum of residential development proposed. This accords with the position of Countryside.

2.20 The EFDC response also notes that the 6.2km Zone of Influence (ZOI) for the Epping Forest SAC bisects the NWB Urban Extension Masterplan Area, with only 10.7ha of the gross developable area of the site falling within the ZOI. The response also asserts that there is no legal requirement for developers to future proof their developments, should the ZOI change at a future date. Analysis completed by David Jarvis Associates and Strutt & Parker, on behalf of Countryside, has established that based on the NWB Urban Extension Masterplan a maximum of 4.178ha of proposed residential development would be located within the ZOI, equating to approximately 150 dwellings and a need for approximately 2.816ha of SANG to mitigate against recreational pressure. An area of 4.841ha, well in excess of the 2.816ha required, is subsequently proposed to the south-west corner of the NWB Urban Extension Masterplan Area. There is consequently no requirement for any further SANG provision to mitigate against the NWB Urban Extension, albeit Countryside have no objections to facilitating connectivity to and from a SANG between the two masterplan areas should EFDC seek to deliver one separately.

Massing and Scale

2.21 Lastly, in time it would be beneficial to have further understanding of the massing and scale of the industrial units and how they will affect strategic views of the airfield from the NWB Urban Extension, perhaps through the inclusion of wireframe visualisations from a select number of important viewpoints. Countryside have sought to incorporate strategic views of the airfield and its Listed control tower within the NWB Urban Extension Masterplan, given the importance of the airfield for the identity of NWB and its heritage.

3. Conclusion

3.1 To conclude, Countryside are supportive of a number of positive changes that have been incorporated into the latest iteration of the NWA Masterplan.

3.2 This consultation response has therefore principally sought to highlight matters that could benefit from further consideration or clarification, rather than raising objections. In particular, it highlights where further consideration and clarification could be provided in relation to the highway impacts, including cumulative impacts; wider connectivity and integration with the NWB Urban Extension Masterplan; bus routing; noise impacts; and the scale and massing of the industrial units and their landscape impact.

3.3 Other general observations have been made with regards to the red line for the NWA Masterplan Area and the proposed SANG.

3.4 We hope that this consultation response is of assistance in the progression of the NWA Masterplan as it moves towards formal endorsement. However, if there are any points raised which EFDC feel would benefit from further discussion with

Countryside and wider stakeholders, this is something that we would be more than happy to facilitate.

2. Essex County Council

ECC has taken this opportunity to comment on your current consultation and provide feedback on the Masterplan proposals at North Weald Airfield.

ECC is a key infrastructure and service provider and is responsible for delivering and commissioning a wide range of strategic and local infrastructure requirements and public services to support and shape inclusive and healthy communities. ECC's role covers a wide range of statutory services including (but not limited to) highways and transportation, education, early years and childcare, minerals, waste, surface water management, passenger transport, adult social care, and public health. We also advise on, and have a material interest in, a number of other related place-making matters to assist in the determination of planning applications.

The Growth and Development team at ECC is responsible for coordinating single corporate responses for major development schemes and Nationally Significant Infrastructure Projects to ensure that the Council's interests and responsibilities to deliver quality and sufficient infrastructure in the right places and at the right time are effectively communicated, and to support good place-making and place-keeping for existing and future communities.

At this time, the Growth & Development team have coordinated, with one exception, only statutory consultee responses to this Masterplan. As part of future consultations/planning applications at the site, other non-statutory service area teams may look to provide comments on the proposals. ECC trusts that other relevant bodies will provide comments on other topics areas such as, but not limited to, landscape, ecology, health and heritage.

ECC has reviewed the Masterplan documents, and has a number of comments to make on the proposed development at this site. ECC trusts that the following comments will be considered in the spirit within which they are provided, to assist with and be taken into account, in the shaping of the Masterplan.

We would encourage and recommend further pre-app to resolve any points/comments raised in this letter. ECC would be willing to positively engage and further cooperate on any future workshops relating to the site. This is subject to ECC's cost of involvement being fully recovered.

1. Planning

Policy Context

North Weald Airfield has been identified in EFDC's Draft Local Plan as a strategic masterplanning site under draft policy 'P6 North Weald Bassett' with a site reference NWB.E4A. The draft policy allocates 10 hectares of employment land of B1, B2 and B8 uses to the east of main runway.

Relationship to North Weald Bassett Masterplan Area

Sites NWB.R1, NWB.R2,NWB.3,NWB.4, NWB.5 and NWB.T1 as identified in EFDC's Draft Local Plan have been identified as locations where development should be brought forward in accordance with a Strategic Masterplan for circa. 1050 homes and associated infrastructure. This masterplan area sits in close proximity to the east of North Weald Airfield masterplan area. ECC wish to emphasise the point that the two Masterplan Areas for North Weald Airfield and North Weald Bassett should be considered together in a co-ordinated holistic approach to maximise interconnectivities and sustainable links within, and between the two sites and wider area. The relationship between the two Masterplan areas and other comments, observations and points of clarification are raised in service area specific comments detailed in the below sections.

2. Highways & Transportation

In terms of highway & transportation considerations, ECC would firstly like to highlight that the Masterplans for both North Weald Airfield and 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 (and relevant passenger transport providers) 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 through the Inspector's Main Modifications process (as agreed by EFDC), so is likely to constitute an (emerging) Local Plan policy requirement.

Importantly, this feasibility evidence to date has not been demonstrated. Such evidence should underpin both masterplans so that it can be considered what are the most appropriate sustainability measures for both sites. It is considered necessary for this important evidence to be brought forward within the masterplan preparation process to ensure that transport and access to the site is sustainable and this would assist in the scheme's consideration through the Quality Review Panel process. These measures supported by evidence can then be designed and incorporated into the overall masterplan frameworks. Until this work has been completed, definitive conclusions therefore cannot be made whether the current proposed measures incorporated into this North Weald Masterplan are the most effective in delivering a modal shift away from the private car to sustainable travel modes.

Notwithstanding that definitive conclusions cannot be made on the suitability of sustainable transport measures currently proposed, ECC recognise and support in principle, the sustainable transport modes links proposed from the site to surrounding developments both existing and new. These however, need to be developed as part of an overall masterplan approach to North Weald Airfield and North Weald Bassett Masterplan areas as well as the existing wider surrounding area. This draft masterplan, for example, references a bus route connecting the site but provides little detail as to how this would link with the proposed North Weald Bassett Masterplan area. A more holistic approach to the interconnectivities between

the sites is required to ensure provision is made which maximises potential of any bus service not only to serve the local community, but to operate revenue support free on a financially sustainable basis.

In terms of the modal filter at the south of the site, it is considered that this measure could help to encourage sustainable trips to the site and help to reduce impact on the forest as less traffic would be attracted through Epping and would direct development traffic towards the strategic network A414 and M11. This proposed development however, in conjunction with the proposed North Weald Bassett residential development and the recent operational HM Revenue and Customs North Weald Airfield Inland Border Facility Proposal, would cumulatively increase traffic on the surrounding strategic network including at junction 7 of the M11. The Masterplan should explore in more detail and demonstrate in principle therefore, what is the overall strategy for mitigating against forecasted increases in traffic on the local and wider strategic network. ECC advised for the HM Revenue and Customs North Weald Airfield Inland Border Facility Proposal that M11 J7 was operating (in pre pandemic times) at or above its design capacity. With demonstrable increases in traffic levels since pandemic lockdown levels, this pressure on J7 is anticipated to now present a significant issue once more. As part of the overall transport mitigation strategy for this masterplan development therefore, attention is necessary towards managing residual traffic impacts on J7 when the level of mitigation to be provided by sustainable and other travel management measures has been established.

ECC would also like more justification and clarity around the statement included with the draft masterplan which refers to parking being provided to national or local standards where appropriate. As highlighted previously, sustainable transport feasibility evidence should underpin and feed into the overall design of the 4 Masterplan and such evidence may provide more conclusions on what form of parking strategy is appropriate to encourage more sustainable forms of travel. Currently it is not clear how providing parking to local or national standards would help to support more sustainable forms of travel to the site. ECC therefore recommends that a potential lower standard of provision could be incorporated to promote more sustainable travel to the development. Sustainable transport feasibility evidence however, should underpin any transport measures included at the site to enable any reduced parking provision.

In relation to cycling and walking provision routes proposed on the site itself, ECC recommends that off road cycle and walking provision should be provided to the principles contained within LTN1/20 Cycle Infrastructure Design along the primary routes proposed through the site. Current proposals only provide a walking/cycling route to the east of the site. This design therefore, abandons vulnerable modes of travel at the point where they are most at risk of encountering large vehicles.

To discuss points raised in relation to Highways and transportation, it is highly recommended that formal pre-app discussions with the Highway Authority take place to help inform the masterplan process and ensure that Highway and Transportation measures are fully addressed. Any formal pre-app discussions however, should holistically consider highway and transportation issues in relation to North Weald Airfield and North Weald Bassett masterplan area and the wider surroundings.

3. Economic Infrastructure and Skills

It is noted that the masterplan continues to support airfield-related uses through height restrictions, improvements to existing airfield infrastructure and airside access. We are also pleased that a variety of unit sizes has been retained, and highlight that Grow-on Space for businesses that have outgrown their initial accommodation should be incorporated into the final masterplan.

In terms of phasing and delivery, consideration should be given to whether the smaller unit typologies such as new office space and small-scale light industrial uses would require public support to achieve viability and, if so, whether this could be delivered in an earlier phase (currently, anticipated in Phase 4 of 4).

In considering the overall design of the site, it should be considered whether the success of the smaller employment areas may be more dependent on quality of placemaking in its immediate vicinity compared to other parts of the site. The placemaking framework for example, only refers to strong elevational / frontage treatment of buildings at key entrance points into the site as well as along the primary movement network. Furthermore, whilst it is welcomed that smaller scale employment units are still located closest to North Weald Basset Village Centre, we note that they are now furthest from potential on-site amenities e.g. open space, potential new café / community uses, wildlife enhancement area. The proposal also seems to be car-dominated without a human-scale streetscape and remains unclear how the North/South green link might integrate with building entrances. Good quality place-making therefore should be considered throughout the site to ensure the success of all areas of the site.

4. Lead Local Flood Authority

Having reviewed the draft strategic Master plan, ECC recommends the development proposal consider the provision of multifunctional space with green and blue infrastructure. Given the proposed commercial and industrial nature of the proposal, The LLFA would also recommend that options such as central rainwater harvesting system to deliver some of the community's water requirement and promote efficient ways of water management should be incorporated as referenced in the draft Masterplan. Surface water flood risk and onsite drainage proposal should be designed to mitigate any adverse impacts on existing as well as proposed development. The overall drainage scheme should be designed to be in line with the Essex SuDS Design Guide.

At this stage of the planning process there is no formal requirement to consult with the LLFA. Early engagement however, can help reduce potential delays later on in the planning process. As proposals at the site continue to progress and take form, we would recommend that the LLFA/Epping Drainage Team is engaged in further preapplication engagement . Such engagement should take place as early as possible as SuDS can have a significant impact on the detailed layout of a site.

Key areas of consideration prior this meeting should include.

- The impact of the development on discharge rates for the site

- How potential increases in the volume of water leaving the site will be mitigated
- How pollution generated on site will be mitigated.
- The impact of Climate Change and unplanned development
- Space for the inclusion of features that will not only manage the above issues but that will also provide additional amenity or biodiversity value.
- Multifunctional use of space
- Adoption and maintenance considerations.
- Other flood risk not addressed by the LLFA

5. Net Zero Carbon and Renewable Energy Generation

The UK is bound by the Climate Change Act 2008 to achieve net zero Green House Gas (GHG) emissions by 2050. Furthermore the independent, cross-party Essex Climate Action Commission (ECAC) published it's final report in 2021 with recommendations including all new development be net-zero by 2025 and carbon positive by 2030.

In line with these targets, ECC therefore welcomes the target of delivering a net-zero carbon development in operation and also the aim to complete a Whole Life Carbon (WLC) assessment for the development accounting for operational and embodied carbon emissions. A development of this size has an opportunity to provide exemplar sustainable development and include innovative techniques and technologies to help combat both operational and embodied carbon emissions from the development.

6. Minerals & Waste

This section deals with relevant mineral policy matters and waste policy matters in turn. The site is not within a Mineral Safeguarding Area, Mineral Consultation Area or Waste Consultation Area. The below should be considered as the development proposals at the site continue to progress.

Mineral Supply Audit

The MWPA would request that as the development proposals at the site develop, a Mineral Supply Audit should be developed 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'.

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 outlined 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 reuse targets will contribute to a reduction in primary aggregate demand.

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.

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: “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”.

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 documents. We would therefore recommend that, in line with sustainability objectives outlined in the Masterplan and as the development proposals develop, the applicant should prepare an appropriately detailed waste management strategy through a Site Waste Management Plan.

A SWMP would be expected to:

- 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,
- establish strategic forecasts in relation to expected waste arisings for construction,
- include waste reduction/recycling/diversion targets, and monitor against these, 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.

7. Broadband and Connectivity

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.

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.

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.

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.

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.

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 8 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.

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 new housing, or business parks.

Conclusion

Overall, ECC have raised a number of points and comments in relation to the draft masterplan for North Weald Airfield. As stated earlier, we recommend more formal pre-app discussions if you would like to further guidance on service/topic specific issues. If any of the comments provided in this letter require further explanation, then please get in touch with Ellie Scott (Senior Planner) as detailed below.

3. Harlow Council

Firstly it is important to ensure the North Weald Airfield site and the emerging North Weald Bassett urban extension site are linked in a sustainable way. It is therefore welcomed that the masterplan indicates the green route proposed through the Airfield site is linked to Bassett site through the proposed Suitable Alternative Natural

Greenspace (SANG), providing pedestrian and cycle access between the two masterplan areas and the village. The opportunity should be taken to integrate the proposed bus route to the surrounding area, and in particular to Harlow District and the strategic housing sites that form part of the Harlow and Gilston Garden Town. More information would be helpful in this respect.

The proposed main north access to the site, which links to the M11 through the A414, and the separate access from Epping Road for the south section of the site, will alleviate traffic on Epping Road and passing through the forest. However, there is concern over the impact increased traffic will have on the surrounding strategic network including Junction 7 of the M11, where HGV's and general site vehicle traffic will be encouraged to use the northern access point for a more direct access to the M11. The masterplan should, therefore, demonstrate a mitigation strategy in respect of the addressing the increased traffic on the strategic network, especially Junction 7, to ensure the planned future growth occurs in a sustainable manner. Clearly the impact on air quality from the increased traffic will also need to be investigated, especially given the potential impact on Epping Forest.

The employment development parcel variation from larger units, supporting warehousing and logistics, and smaller units for office and light industrial is welcomed which will provide a variety of spaces for potential businesses. Notwithstanding current local plan provision in the Harlow Local Development Plan (HDLP), it is pointed out that employment land availability in Harlow is likely to be limited in order to accommodate future growth beyond the plan period; in addition the employment sectors that will be suitable for the site will therefore need to be complementary to those located in Harlow. Providing a diversity of business accommodation will be a welcome addition to supporting employment in the FEMA area.

The Council also welcomes the retention of and improvements to the existing airfield infrastructure and airside access. It remains important to protect the historic assets of the airfield with its important role in WW2. Access to the control tower is welcomed and access to other historic assets, for example the Squadron and other cafés to the west side of the airfield are expected to be maintained. To encourage and enhance visitor economy for the wider geography, incorporation of improved visitor and promotion of the heritage assets would also be welcomed.

Harlow Council will expect we will be kept informed on the North Weald Airfield Masterplan and future development and hope that the strategy set out is implemented in future development of the area.

4. Historic England

North Weald Airfield is a former Royal Flying Corps and Royal Air Force fighter station that was first developed during the first world war and subsequently expanded to meet the demands of both the second world war and cold war periods. Most significantly, though, it was the operating base for a number of foreign fighter squadrons during the second world war, including Norwegian, Czech, Polish, Canadian, New Zealander and American volunteers. The station played a

particularly important role in the Battle of Britain and Dunkirk as part of Fighter Command's 11 Group. The RAF ceased use of North Weald in 1964, and it was transferred to civil ownership in the late 1970s. It remains an active airfield.

There remain a number of features of significance on the airfield that reflect its military heritage. This includes most noticeably the post-war control tower building (Grade II), built at the advent of the jet-fighter age and the best surviving example of its type, of which only 7 were built. Other non-designated heritage assets from all periods of the airfield's use also surviving, including a pre-war Type A hangar, other smaller buildings and some defensive infrastructure in the form of perimeter pillboxes. Together with the listed Control Tower and Officer's Mess (Grade II, to south of the airfield) this assemblage of buildings set within the still open area of the airfield represents an important survival of a multi-phase military airfield.

The proposed development is located on the eastern side of the airfield, in a 10ha site allocated in the emerging Epping Forest Local Plan for mixed employment uses. This consultation builds on an early consultation conducted in November 2020, which Historic England did not engage with. The masterplan sets out that proposals would Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU Telephone 01223 58 2749 HistoricEngland.org.uk Please note that Historic England operates an access to information policy. Correspondence or information which you send us may therefore become publicly available. see the demolition of most structures within the allocated area, with the exception of the listed control tower, and the construction of a mix of buildings for employment use with associated landscaping, access and infrastructure. Larger new buildings would be located towards the north, where access to the strategic road network is more effectively facilitated, and smaller units would be located to the south. Access to the site by sustainable modes of transport are encouraged, including a cycling route which would also incorporate a heritage trail. It is proposed that the control tower would be retained and converted to a new use, whilst elements of its relationship with the airfield's open space and runways would also be partially retained by the layout of the buildings, the mass and form of which would also aim to emphasise the control tower's presence.

Paragraph 189 of the NPPF sets out that heritage assets are an irreplaceable resource that should be conserved in a manner appropriate to their significance so that they can be enjoyed by future generations. Paragraph 190 requires that plans should set out a positive strategy for the conservation and enjoyment of the historic environment, taking into account the desirability of sustaining and enhancing heritage assets and putting them to new uses consistent with their conservation; the social, cultural, economic and environmental benefits of the historic environment; the desirability of new development making a positive contribution to local character and distinctiveness; and finally the importance of using the historic environment to inform place making.

Historic England does not object to the principle of the development proposals set out in the masterplan, and we did not object to the allocation of the site in the emerging Local Plan. We would like to make the following comments on the proposals, however.

The proposed development will result in harm to the significance of the listed control tower owing to development in its setting. By its nature, a control tower requires a commanding view across the extent of the airfield and is naturally therefore a building that is located in a position and to a height that affords it such a vantage point. The construction of the buildings associated with the new use for the site will interrupt this open vista and reduce its prominence. The proposals will comprise a physical and conceptual barrier to understanding its former role. This harm would be of less than substantial nature in terms of the NPPF.

We consider that this harm is, however, unavoidable in the context of the site's proposed use and the constraints of its layout. Taking into account the need to minimise the harm, we therefore broadly welcome the masterplan's proposed approach to retaining specific key views out from the control tower across the airfield and towards the listed church tower to the north. We also are pleased to note that the control tower is proposed to be converted to a sustainable new use and that its adjacent landscaping will also serve to emphasise the building's character and interest. With regard to landscaping, we suggest that inspiration could be taken from the principles of the landscape led expansion of RAF airfields in the 1930s, which saw the use of tree planting and green spaces to create a 'campus' like effect, with the input of the Royal Fine Art Commission.

We welcome the proposals to create a heritage trail through the site beginning at the airfield's museum and memorial. A similar approach has been successfully adopted on other former airfields that have been redeveloped, such as RAF Oakington in Cambridgeshire. In addition to the control tower, we would welcome other opportunities to reveal and highlight the interest of the airfield's heritage on this trail, and throughout the masterplan process. North Weald airfield has a particularly interesting social history that reflects the multi-national nature of the Battle of Britain and the air war generally. This is an aspect that could be further explored and incorporated into the place making activities that occur as part of the development. This could be reflected in interpretation signage, street and building names, the layout of spaces and design of landscaping. We welcome the principle of a public engagement programme, as set out on page 50 of the masterplan.

We note that the redevelopment of the site will result in the loss of the remaining Type A hangar on the site. Paragraph 205 of the NPPF sets out that local authorities should seek the recording of any heritage assets that will be lost as part of the development process, with the evidence gathered made publicly available. As the proposals may result in the loss of important but non-designated heritage assets, we would recommend that an appropriate recording schedule is agreed with Essex County Council's archaeological advisor, and that the information gathered is made publicly available – perhaps in the North Weald Airfield Museum.

However, we would also suggest that options for reuse could also be explored for the surviving Type A Hangar, which as noted is the only historic hangar to remain in the technical area of the airfield. This building not only reflects the site's heritage and contributes to the setting of the designated heritage assets on the site, but in the context of climate change it is also a structure that will contain substantial embodied carbon. Its conservation, conversion and reuse could reduce the carbon footprint of

the development whilst also retaining additional elements of the airfield's wider heritage significance.

We note that the proposed cycle and active transport link is located on the eastern side of the site, but would nonetheless highlight the government's recently published LTN 1//20 guidance on incorporating active transport infrastructure, and suggest that all streets, junctions and access points to the development should be designed with these principles in mind, rather than only along a specific dedicated route.

Historic England strongly advises that the conservation and archaeological staff of the relevant local authorities are closely involved throughout the preparation of the masterplan and its assessment. They are best placed to advise on; local historic environment issues and priorities, including access to data held in the Historic Environment Record (HER), how the proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

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 masterplan, where we consider these would have an unjustified adverse effect on the historic environment.

5. National Grid

About National Grid

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses. National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use. National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.

Response

We have reviewed the above document and can confirm that National Grid has no comments to make in response to this consultation.

Further Advice

National Grid is happy to provide advice and guidance to the Council concerning their networks.

6. National Highways

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 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.

I have no further comments to make on the plan.

7. North Weald Bassett Parish Council

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

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

PART A – THE PROCESS

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

- EFDC Allocation NWB.E4A
- EFDC Allocation NWB.E4B
- North Weald Airfield (operational airfield area) which collectively make up the North Weald Airfield Strategic Masterplan Area.

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

The proposals in this consultation state on page 1 that the ‘Strategic masterplan and associated consultation are specifically related to the allocated employment site of the North Weald Airfield Masterplan Area’, thus effectively splitting the Masterplan Area identified in the Local Plan. If this is the case, it does not address the future uses of North Weald Airfield as a whole, including setting out the type of aviation and activities proposed for the active airfield site, and only considers the employment allocations. This therefore suggests that a further Masterplan (or even Masterplans) will be created to cover the remaining areas. The SVLP makes no distinction

between the employment allocations and the operational airfield and views the masterplan area as one area. Paragraph 2.92 in the SVLP states that 'Strategic Masterplans for sites wholly in the ownership of the Council are likely to be of a more detailed nature.' Clearly this is not the case as a large part of the Masterplan Area has been entirely omitted and this Consultation does not explain, nor offer any justification, as to why this is the case. It also gives us no indication of what the next step is concerning the operational airfield area, and if another Masterplan will be forthcoming.

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

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

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

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

In summary, the consultation is flawed, primarily because it fails to fulfil the requirements of Policy P 6 of EFDC's own Local Plan (SVLP) as it does not cover the

entire Masterplan area, but also because there are too many unknowns and unanswered questions including but not limited to:

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

PART B – THE PROPOSALS

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

Transport / Traffic / Vehicle Movements

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

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

Access Points

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

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

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

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

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

The Parish Council also has concerns about the wording of the proposed bus service, specifically referencing page 7 of the consultation where it states under 'Sustainable Movement' that a 'new sustainable bus link could be accommodated through the site'. These concerns also relate to page 10 under the transport and movement sections which states a "possible new bus route to link the site with Epping underground station, North Weald Bassett village and the surrounding areas".

In order to fulfil the criteria of the Local Plan in terms of modal shift, it is vital that a new bus link be provided to the site from Epping and the surrounding areas, and this wording should be strengthened to emphasise it must happen. This bus route is also referenced on page 8 under the Movement Framework, and also on page 11, but with more positive phraseology. This ambiguity does not instil confidence that there would in fact be a new bus route. It is also worth pointing out that bus route SB11 should be removed from paragraph 2.29 on page 15 of the Masterplan document as this route is no longer in operation.

Church Lane

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

New Entrance Point to Airfield

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

Connectivity

There are a number of references throughout the document proposing that the new Cycle and Walking infrastructure could link up with the train station, however it is unclear why this is being proposed. At this stage it is assumed this is referring to the Epping Ongar Railway (EOR) at North Weald. This railway is a Heritage Railway line that operates as a visitor tourist attraction and is not a functioning railway line providing a commuting link. No rationale for this suggestion has been included, nor

are there any plans detailing how this would work. In order for the site to have any chance of being truly sustainable, a cycle link between Epping and North Weald is needed, however this is not even suggested within the proposals.

Parking

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

Heritage

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

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

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

Page two of the proposals state that there will also be open spaces located throughout the site to provide the opportunity to hold the outdoor market. The Parish

Council has concerns as to the feasibility of this, especially considering these spaces have not been indicated on the illustrative site plans so an assessment as to the feasibility of suggestions can be made. Furthermore, the weekly market attracts visitors from all over the county and further afield who visit using a private motor vehicle, and the proposals do not indicate where the vehicle parking would be accommodated and how this would impact on the Employment Area. The proposals as submitted do not address this issue sufficiently.

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

Environmental

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

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

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

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

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

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

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

Phasing and Delivery

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

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

CONCLUSION

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

