

Supplementary Committee Agenda



**Epping Forest
District Council**

Cabinet Monday 10th July 2023

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

Time: 7.00 pm

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

8. ENDORSEMENT OF LATTON PRIORY STRATEGIC MASTERPLAN FRAMEWORK (Pages 3 - 102)

(Place – Cllr N Bedford) To agree to formally endorse the strategic masterplan framework (C-007-2023-24).

Please see Appendix C: Statutory consultee responses attached.

This page is intentionally left blank



CEG

By email:

lattonpriory@ceg.co.uk



Chris Colloff

Email: chris.colloff@thameswater.co.uk
Mobile: 07747 647021



Thames Water Ltd
1st Floor West
Clearwater Court
Vastern Road
Reading
RG1 8DB



thameswater.co.uk

Our Ref:

17 January 2023

Latton Priory Strategic Masterplan Framework Consultation

Dear Sir/Madam,

Thank you for consulting Thames Water on the above document. Thames Water are the statutory sewerage undertaker for the area and as such have the following comments to make on the masterplan framework document.

Wastewater Infrastructure

Page 39 of the document provides guidance on flood risk and storm drainage issues. It is stated that storm water drainage will be able to discharge to the watercourses and would not be reliant on connection to Anglian Water storm sewer assets. It is then highlighted that Anglian Water are the incumbent foul water company for the area with several foul water mains to the west and north of the site. The site lies within the area served by Thames Water and as such the masterplan should be updated to reflect this.

In response to consultation on the submission version of the Epping Forest Local Plan it was highlighted that the wastewater network capacity in the area of Latton Priory is unlikely to be able to support the demand anticipated from the development and that strategic drainage infrastructure is likely to be required to ensure sufficient capacity which will need to be brought forward ahead of the development. These comments were on the basis of the draft allocation for 1,050 homes together with employment development and it is noted that the consultation masterplan framework document refers to up to 1,500 homes including a local centre. The timescales for delivering infrastructure should not be underestimated with local upgrades taking 18 months to 3 years to plan and deliver. Strategic upgrades can take up to 5 years to deliver.

As set out in the emerging Local Plan, there should be early engagement with Thames Water to discuss the infrastructure requirements for the development and ensure that development is aligned with the delivery of any necessary infrastructure upgrades. Further information on pre-planning enquiries can be found at: <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity>

I trust that the above comments will be given due consideration. Should you have any queries regarding the comments please do not hesitate to contact me.

Your sincerely,

Chris Colloff MRTPI
Planner

Sport Facility Calculator

The Sports Facility Calculator (SFC) is a planning tool which helps to estimate the amount of demand for key community sports facilities that may be generated by a given population. The SFC is hosted on the Active Places Power website - <https://www.activeplacespower.com>.

The SFC results presented below are based on the following criteria:

Area of Interest: Epping Forest **Population:** 3,600
Population Profile: Epping Forest **Date generated:** 06/01/2023
Build Costs: Q3 2022 **BCIS:** July 2022
Population: Population: Projection for 2022, based on 2011 Census data and modified by 2018-based Subnational Population Projections for Local Authorities. Adapted from data from the Office for National Statistics licensed under the Open Government Licence v.3.0. London boroughs modified by GLA 2020-based Demographic Projections - ward populations, identified capacity scenario, © Greater London Authority, 2020.

Facility Requirements:

Indoor Bowls	
Demand adjusted by	0%
Rinks	0.06
Centres	0.01
vpwpp	9
Cost	£25,499

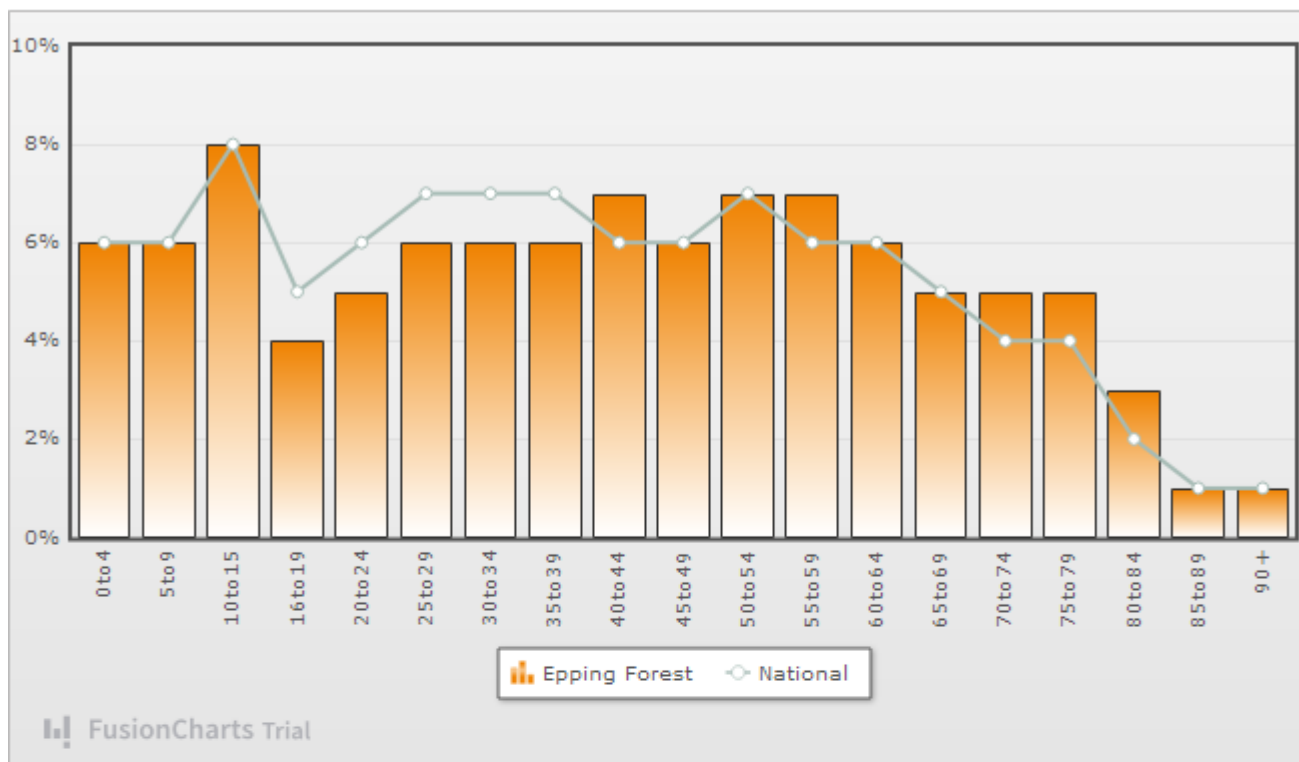
Sports Halls	
Demand adjusted by	0%
Courts	1.02
Halls	0.25
vpwpp	300
Cost	£716,341

Swimming Pools	
Demand adjusted by	0%
Square meters	38.96
Lanes	0.73
Pools	0.18
vpwpp	237
Cost	£786,542

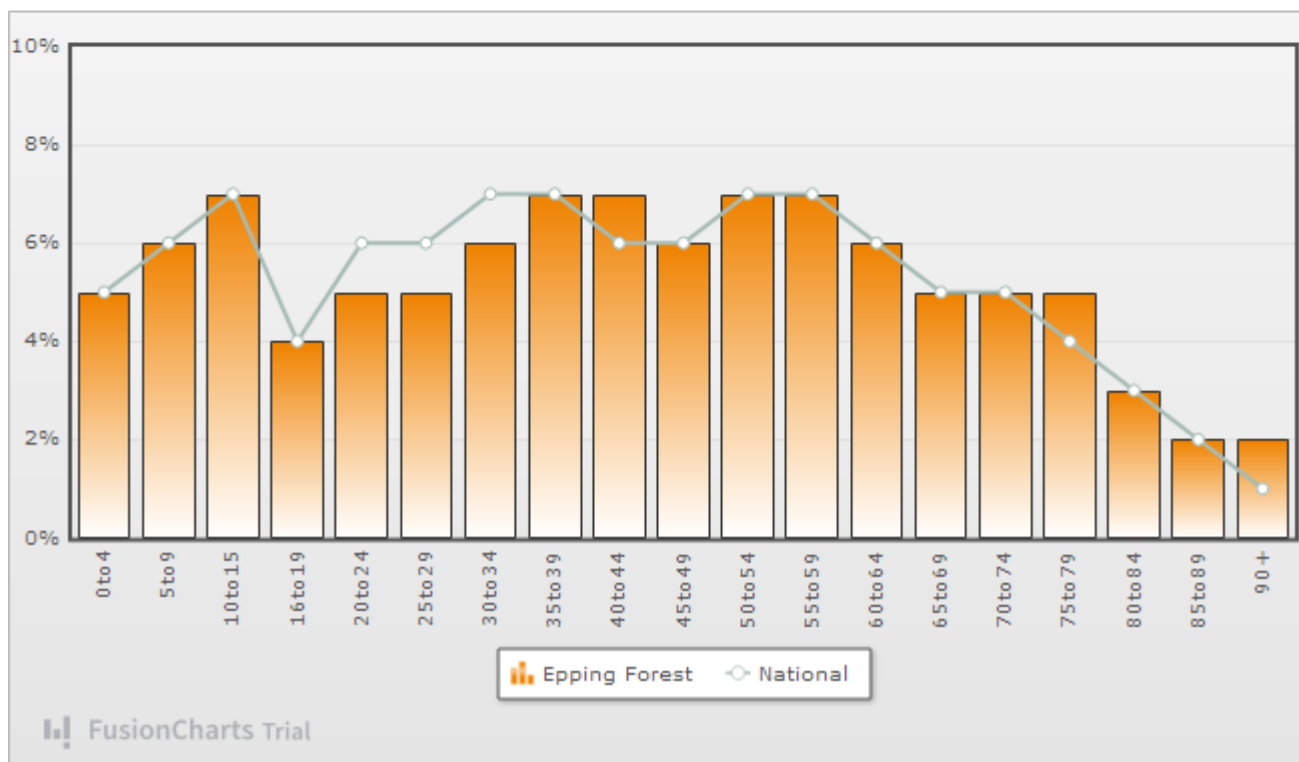
Population Profile:

AOI Age / Gender	Epping Forest		National	
	Male	Female	Male	Female
0to4	6%	5%	6%	5%
5to9	6%	6%	6%	6%
10to15	8%	7%	8%	7%
16to19	4%	4%	5%	4%
20to24	5%	5%	6%	6%
25to29	6%	5%	7%	6%
30to34	6%	6%	7%	7%
35to39	6%	7%	7%	7%
40to44	7%	7%	6%	6%
45to49	6%	6%	6%	6%
50to54	7%	7%	7%	7%
55to59	7%	7%	6%	7%
60to64	6%	6%	6%	6%
65to69	5%	5%	5%	5%
70to74	5%	5%	4%	5%
75to79	5%	5%	4%	4%
80to84	3%	3%	2%	3%
85to89	1%	2%	1%	2%
90+	1%	2%	1%	1%
Total	100%	100%	100%	100%

Male Population by Age group



Female Population by Age group



DISCLAIMER: Sport England has made all reasonable endeavours to ensure the accuracy of the material contained in the Sport Facility Calculator. The Calculator has been produced in good faith and Sport England does not accept any liability that may come from the use of it. The use of the Calculator is entirely at the user's own risk and Sport England does not accept any liability caused from its use.

From: Planning <planning@affinitywater.co.uk>

Sent: 19 December 2022 14:10

To: Emma Charlton <echarlton@eppingforestdc.gov.uk>; Implementation Team Mailbox <implementationteam@eppingforestdc.gov.uk>

Subject: RE: Latton Priory Masterplan Consultation

CAUTION: This Message originated outside of Epping Forest District Council. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Planning Team,

Thank you for the above consultation.

We note that the consultation relates to the Masterplan of the Latton Priory site, which is already allocated for development and subject to a live planning application; as such, our comments are limited.

We welcome the Water Management section of the Masterplan and all requirements included within this chapter. It is essential that these requirements are enforced to save water for all.

There are potentially water mains running through or near to part of proposed development site. If the development goes ahead as proposed, the developer will need to get in contact with our Developer Experience Team to discuss asset protection or diversionary measures. This can be done through the My Developments Portal (<https://affinitywater.custhelp.com/>) or aw_developerservices@custhelp.com.

In this location Affinity Water will supply water to the development. To apply for a new or upgraded connection, please contact our Developer Services Team by going through their My Developments Portal (<https://affinitywater.custhelp.com/>) or aw_developerservices@custhelp.com. The Team also handle C3 and C4 requests to cost potential water mains diversions. If a water mains plan is required, this can also be obtained by emailing maps@affinitywater.co.uk. Please note that charges may apply.

Please continue to consult us on appropriate planning policy consultations and planning applications via planning@affinitywater.co.uk.

Kind regards,

James Kenyon
Senior Asset Scientist (Planning)
Environmental Policy and Strategies Team
Asset Strategy and Capital Delivery Directorate

Affinity Water Ltd
Tamblin Way, Hatfield, Hertfordshire, AL10 9EZ
www.affinitywater.co.uk || www.facebook.com/affinitywater || www.twitter.com/affinitywater
|| www.linkedin.com/company/affinity-water

AffinityWater

Taking care
of your water



Latton Priory Strategic Site: Planning Strategy Note

Prepared by:

Nick Finney, EFDC Implementation Team Manager
Ione Braddick, HGGT EFDC Lead Officer

Date: 24th August 2022

Contents

1. Introduction.....	1
2. Key project leads/ contacts	1
3. Latton Priory Strategic Site Planning Strategy.....	1

1. Introduction

1.1. The Latton Priory Strategic Site is progressing with a number of different workstreams/ planning aspects live and requiring resource simultaneously. These include the developer-led Strategic Masterplan Framework (SMF), the EFDC authority-led Latton Priory Design Code Pathfinders project - funded by DLUHC, the HGGT STC Connections Route Study Project - funded by Homes England, and the planning pre-application technical work, scoping and evidence.

2. Key project leads/ contacts

- EFDC Implementation Team Manager: Nick Finney
- EFDC Garden Town Lead Officer: Ione Braddick
- EFDC Latton Priory Planning Officer: Richard Schunemann
- HDC Planning input: John Hoad
- ECC Planning input: Tai Tsui
- ECC Highways input: Paul Wilkinson
- Design Code Pathfinders Lead: Krishma Shah (EFDC)
- STC Connector Route Study Project Manager: Adam Halford (HDC)

3. Latton Priory Strategic Site Planning Strategy

3.1. Set out below is a proposed planning strategy for the planning and delivery of the Latton Priory Masterplan Area, supported by the LPA and across Garden Town partners.

3.2. **Masterplan:** The determination of a planning application within the Latton Priory site Allocation should not precede the approval of a site wide Masterplan. This is the approach as set out in Epping Forest Council's Local Plan Submission Version paras 2.89-2.97 (as amended by the MMs and AMs) and Figure 2.1 (as amended by the MMs), Strategic Policy Place Shaping, and in the endorsed Strategic Masterplanning Briefing Note (October 2018). If a planning application is submitted in advance of the approval of a site wide masterplan it may be refused or remain undetermined until a masterplan has been approved. It will be

incumbent on the applicant to ensure that any planning application comes forward in accordance with the masterplan as endorsed.

- I.1. **Applications:** It is anticipated that an Hybrid Outline Application will be made and this should encompass the entirety of the Masterplan Allocation site and all associated land and works within the EFDC area. If an applicant seeks to obtain planning permission for a lesser area, for example just land in their own control, the LPA will be required to accept and determine the application, however, it will be incumbent on the developer to demonstrate that that approach will not undermine the full delivery of the masterplan and associated infrastructure otherwise it may be refused.
- I.1.1. **Suitable Alternative Natural Greenspace (SANG):** the area of land proposed to form a SANG should be included within the Allocation application to ensure that the overall scheme is properly assessed and certainty of delivery is secured.
- I.1.2. **Sustainable Transport Corridor (STC) Connection to Commonsie Road:** the principal sustainable transport route for public transport between the Allocation and the wider HGGT is via the STC Connection from the allocation site boundary to an appropriate connection onto Commonsie Road as indicatively shown on the Harlow Local Development Plan Policy Map.
- I.1.3. The HGGT partners consider it necessary to demonstrate that an acceptable high quality active and sustainable access to the site is achievable. A Full Application shall therefore be required to be submitted to Harlow District Council and be approved prior to determination of any application for the Allocation with details of phasing of delivery to support occupation.
- I.1.4. Subsequently any planning approval for an Application on the Allocation site shall include appropriate triggers and mechanisms to ensure that the STC Connection works are carried out and public transport services made available. Certainty on the form and timing of delivery of the STC connection will provide additional confidence to the HGGT partners in the active and sustainable travel assumptions within any transport modelling.
- I.1.5. HGGT will support the site promoter in developing a feasible and deliverable STC alignment and design that can be progressed to a planning application.
- I.1.6. **Primary Highway Access to B1393 London Road:** the primary private vehicle access from the Allocation to the strategic and Garden Town highway network is via a new link road to the B1393 London Road which will also provide priority onward public transport connections to Epping and the wider EFDC area.
- I.1.7. The HGGT partners consider it necessary to demonstrate that an acceptable highway access to the site is achievable. The highway access and link road should be included with any application for the Allocation, with preference that this be included with full details including early delivery to support construction and occupation. Certainty on

the form and timing of delivery of the primary highway access will provide additional confidence to the HGGT partners in the construction and occupation stage access strategy and impacts within any transport modelling.

- 1.1.8. Secondary Highway Access to Rye Hill Road:** the secondary private vehicle access from Allocation northwards to the adjacent neighbourhood highway network is via a connection to Rye Hill Road to support local permeability only, southward vehicle movement is to be prohibited resulting in an enhanced environment for walking and cycling.
- 1.1.9. The HGGT partners consider it necessary to demonstrate that an acceptable highway and junction design and traffic management scheme to Rye Hill Road is achievable that ensures the route is not used inappropriately such as for construction traffic or journeys other than between the Allocation and adjacent neighbourhoods. Such use should be unfavourable so as to incentivise active and sustainable modes and preferred private vehicle use of the primary vehicle access.
- 1.1.10. The highway scheme should be included with any application for the Allocation, with preference that this be included with full details including completion of works before any connection is made. Certainty on the form and timing of delivery of works to the Rye Hill Road will provide confidence to the HGGT partners that inappropriate use or unacceptable impacts will be prevented through physical limitation as considered in any transport modelling.
- 1.1.11. **Latton Priory Site Capacity:** The draft EFDC Local Plan policy position is the provision of a minimum of 1,050 homes across the masterplan area, with local policy and guidance around placeshaping, modal shift, sustainability and densities.
- 1.1.12. It is accepted that there may be opportunities for higher densities within parts of the Latton Priory site, particularly to enable modal shift and local centre placeshaping, and this could enable a higher site capacity than currently proposed for allocation.
- 1.1.13. In order to agree to a higher capacity and higher densities proposed, the design work should be provided and tested, showing the proposed net density assumptions and a land use budget. This should include showing the upper limit of the density and height ranges, including through elevational plans/cross-sections, to demonstrate that high capacities could be achieved without detrimental impact to the character and appearance of the area, including in views towards the site. This would also be picked up and tested through a Landscape/ Townscape Visual Impact Assessment.
- 1.1.14. The masterplanning/ design work should also set out evidence to support the need for higher densities to enable economical use of land, modal shift and vibrant placeshaping, with case studies or examples which state specific densities and design methods wherever possible.

- 1.1.15. Any increase in the site capacity at the Latton Priory site will also need to be fully assessed in terms of i) traffic impacts (both as a result of this site and when considered in combination with the quantum of development proposed across the entire Garden Town), and ii) by an appropriate assessment with regards to the potential impact on air quality and the Epping Forest SAC.
- 1.1.16. The infrastructure requirements and asks that result from an increased number of homes will also need to be fully understood and reflected in discussions on phasing of provision, planning obligations and increased contributions, and delivery of infrastructure.
- 1.1.17. The above information on requirements and evidence needed to approve higher site capacity must be contained within the Strategic Masterplan Framework document.
- 1.1.18. **Environmental Impact Assessment (EIA):** In accordance with the EIA Regulations and relevant case law 'the project' subject to the EIA should be considered holistically including all works set out above and consideration given to the cumulative impact of relevant other planned developments. It is anticipated that this scope will be established and agreed via a formal EIA Scoping process. A single Environmental Statement can be provided in support of multiple planning applications if submitted concurrently or within such time that its findings remain valid.
- 1.1.19. **Section 106 Draft Heads of Terms and Statement of Delivery:** Section 106 Draft Heads of Terms should be prepared for the Allocation as a whole setting out how the development will meet the infrastructure needs as set out in the HGGT IDP and within other evidence and how other necessary actions will be secured through planning obligations in order to make the development acceptable in planning terms. A Statement of Delivery should also be provided to confirm the applicants position on viability and deliverability in accordance with the HGGT How To Guide to Planning Obligations, Land Value Capture and Development Viability.
- 1.2. The above sets out the expected approach of the HGGT Partners based upon the Local Plan policies and other considerations associated with the Latton Priory Masterplan Area Allocation. The approach set out has been developed with officers working on the project across the HGGT partnership (EFDC, HDC, ECC).



CAMPAIGN TO PROTECT
RURAL ESSEX
President:
Lord Lieutenant of Essex

Chairman: David Knight

RCCE House
Threshelfords Business Park
Inworth Road
Feering
Colchester CO5 9SE
Tel/Fax: 01376 572023
Email: tmoxey@cpressex.org.uk
Web: www.cpressex.org.uk

23 January 2023

lattonpriory@ceg.co.uk

CPRE Essex Response to Consultation on Latton Priory Strategic Masterplan Framework:

Dear Sir/Madam

On behalf of CPRE Essex I welcome the opportunity to make comments on this document.

It would be helpful to have some indication of how these observations will be fed into the next stages in the process and what is the expected time frame for this?

How many of the ideals in the recently published 'Everyone's Essex: our plan for levelling up the county 2021 to 2025' have been incorporated into this Latton Priory Strategic Masterplan Framework?

It is disappointing that this document makes no reference to the proposed Main Modifications to the draft EF Local plan and the EFDC Climate Emergency Action Plan. ECC has been active in developing an overarching Climate Change Strategy along with the Essex Climate Action Commission's report 'Net Zero: Making Essex Carbon Neutral'. This also calls for carbon capture through large scale land use change and the enhancement of the natural environment. Within the Commission's report there are helpful technical annexes and a carbon baseline which gives a clear picture of carbon emissions for the county.

I am aware that the plans for development within Great Harlow which includes the Latton Priory location won accolades for its proposals. It will be important that every effort must be made to ensure that the criteria for energy efficiency within this are met and that monitoring of the development will see that that proposed recommendations are met.

Looking ahead, there is new legislation in the pipeline about building standards which will assist in meeting these targets. The proposed layout of the development should consider the impact of higher summer temperatures on dwellings and other buildings and steps taken to ensure that internal temperatures remain within the recommended comfortable levels. A temperature of 38.8°C was recorded in Epping on 18th and 19th July 2022 and there is an increase the recorded 'tropical nights' when the temperature does not drop below 20°C.

It is of concern that there is no reference to the fact that this site lies within the current Metropolitan Green Belt. In recent months Government ministers have made many public comments about protection of the Green Belt for inappropriate development.

Currently this land is being farmed. Such agricultural land has the capability to make a contribution towards food security for the UK. The land in question has been farmed for well over a 1,000 years and the soil has the potential to store more carbon if managed in an appropriate manner.

In the proposed layout of the development there is little acknowledgment of the hidden archaeological features which have been identified by the survey conducted by Bristow, M. et. al. 2017 and Linford, N., Payne, A, & Pearce, 2016. These provide background information of the historic landscape which, if possible, could be reflected in the layout of the proposed development.

This proposed development is located within Epping Forest District but is closely linked to Harlow which will presumably be expected to provide most of the essential services to the incoming residents including access to retail outlets and GP health care provision. Presumably refuse collections will be run by EFDC. Which postal area will cover delivery of mail?

Will there be an adequate water supply since the development lies within National Drought Zone? I have heard that residents in the recent development at Takeley need to check with their neighbours about staggering times to schedule early morning showers due to inadequate water supplies! Why no mention of grey water installations? Is there adequate capacity for dealing with sewage output?

The M11 Corridor now titled the UK Innovation Corridor <https://innovationcorridor.uk> is seen as the driver for economic growth encompassing dynamic fast-growing clusters connecting London to Cambridge providing employment in the fields of advanced technology and biosciences. This proposed development is part of the ambition by the local authorities to increase their housing stocks to help meet the needs of an increase in population. The housing mix is aimed at those in well paid employment. An annual salary of £85,000 is required to meet the mortgage repayments on the cost of an average three bedroomed house in Essex.

Not all those employed locally will be such high earners and there is a chronic shortage of social housing for those who play vital but poorly paid roles in society. There appears to be limited scope to meet this housing need within this proposed development.

Sustainable Drainage Systems

On the plan showing the proposed development the majority of these appear to be sited on the northern edge of the settlement. Please check the contours to ensure that they will capture all the flow from the buildings.

The Latton Priory site is at the northern end of the Epping Forest Ridge and the meteorological records for Epping some 4.6 km to the south give 679mm as the average annual rainfall in the town. This amount may be exceeded on the development site which at 109m is at a higher elevation. I would recommend the installation of an automatic weather station to provide more local records of rainfall, windspeed and temperatures to help with accurate modelling for the SUDS. Sudden heavy downpours last summer over the Epping Forest Ridge resulted in troublesome surface water flooding in Loughton and Buckhurst Hill.

Access to the Site

The main road access to the proposed development site is from the B1393 London Road. This is a narrow road of Medieval origins and as such is totally unsuited to the movement of HGVs weighing at least 3.5 tons when empty. Although the maximum load weight on HGVs is restricted to 44 tonnes obviously, they would carrying heavy loads as they convey construction materials onto the site. Access for HGVs from the west onto the site via Rye Hill will create serious problems along that narrow road.

Has anyone calculated the actual amount of construction material which will be required during the development of this site and the number of lorry movements to and from the site and assessed the cost of the upgrade of the road to the B1393? Has it been decided where will the construction compound be located as well as the location of an electrical substation to service the development? Undergrounding the electrical supply is a welcome step removing visual intrusions of overhead wires but is more costly.

The B 1393 is a very busy road. During the Zoom meeting on 5th January there was mention of a no right turn towards Epping, but no comment about access into the site when approaching from the north which would require a vehicle to cross two lanes of fast-moving traffic. What steps have been considered to resolve the issues of access into and out from the site onto the B 1393? Survey this will have to be controlled either via a roundabout or phased traffic lights?

The volume of traffic on this road is set to increase with the proposed developments in Thornwood and Epping as well as those likely to occur in North Weald and Greater Harlow. I understand that further traffic modelling is to be undertaken but will this include all the incremental growth within a radius of 10, 20 or 30km? Does such modelling include the anticipated increase in delivery vehicles as a result of online purchases, not just of food, but a wide range of other essentials?

ECC and the relevant local authorities are encouraging individuals to reduce the reliance on cars for travel to employment sites but for private car use will remain the norm for many to access rail services into London, Stansted, or Cambridge from Harlow or to use the Central Line from Epping to travel into London. Travel to employment sites in Chelmsford or Enfield will have to be by private car.

Although there is a proposed direct bus/tram/rapid transport system northwards over the ridge into central Harlow to link to existing Overground Rail Services and the proposed improved public transport services within Harlow, the format of this is still uncertain. How frequently will this operate, will it run at times to suit shift workers? How will it be funded in the long term, will it limit emissions, how reliable will it be, and will residents actually use it? Will this form of public transport enable residents to access the new Harlow Hospital either as patients or employees?

The multistorey car park at Harlow Station has parking for 739 vehicles. There is a fast service into Liverpool Street, but the rail fare is more expensive than a TfL journey into London. Trains from Harlow also link to other employment hubs within the Innovation Corridor. There are lifts to the platforms at Harlow Station.

An alternative route into London is to use the Central Line from Epping Station as TfL fares are cheaper. Epping Station Car Park has 532 parking spaces, but it is regularly completely full by 7.30am. There is little available alternative parking within Epping itself. At the current time Epping Station is not fully accessible.

The tube journey time between Epping and Liverpool Street Underground Station is around 38 mins. The frequency of service varies throughout the day. This service may have reduced frequency if subsidies from TfL are withdrawn in the future as Epping is located outside of Greater London.

There is a regular bus service between Epping and Harlow but accessing a bus stop on the B 1393 to travel into Epping would require a walk of over 730m to the main road, hardly an inviting proposition to add to the dangers of attempting to cross the lines of fast-moving traffic on the B 1393. Would there be sufficient uptake of a shuttle bus service into Epping from the development site?

With the current road configuration of the B 1393 traffic volume and speed safe cycling is not an option.

Air pollution

The EFDC draft Local Plan Policy DM22 (Air Quality) and its Air Pollution Mitigation Strategy (APMS) sets out the actual measures that the Council intends to implement during the lifetime of the Local Plan to 2032. These measures seek to limit the increase in traffic volumes through the Epping Forest SAC. While the aspirations of the developers is that 60% all journeys associated with the site to be by sustainable travel which is only feasible for local journeys into Harlow. Realistically private car usage is likely to continue for some time. Not all delivery vehicles will be electric. Electric vehicles are not totally free of harmful emissions as the tyres and brakes shed toxic particles which end up in local soils.

Since the main exit from the development is onto the B 1393, it is inevitable that developments of this size will result in an increase in vehicle movements through Epping Forest. It is of considerable concern that the potential impact of emissions from vehicle movements on the roads through the SAC of Epping Forest has not been properly addressed. Recent research has shown that ancient trees store considerable amounts of carbon while they are alive. There are growing concerns about the impact of toxins shed by vehicles on the health of soils and especially the integrity of the wood wide web which supports healthy tree growth. High levels of atmospheric pollution including nitrous oxides and low-level ozone interfere with vibrant tree growth which in turn reduces the potential for carbon uptake. High traffic volumes and speeding vehicles also impact on viability of local wildlife thus reducing biodiversity.

The proposed provision of electric charging points may encourage residents to switch to electric vehicles but hydrogen powered vehicles may be a favoured longer term option. In the meantime, will there be adequate provision for the parking of trade vehicles as well as private cars?

Protection of existing green wedges on site.

There are several small linear stretches of long established vegetation on the site which may support a range of species. The proposed layout of built development encroaches close to their boundaries. The proximity of human habitation to such areas has been show to have a detrimental effect on many species which inhabit such areas. This zone of influence extends at least 50m into the established habitat and if possible a buffer zone of at least this width should be left between boundary of the property and the long established vegetation. Such green corridors do link up with the proposed SANG and will allow for the natural colonisation of newly planted vegetation by species to be found in the longer established woodlands to the east north of the proposed development.

Green Infrastructure and recreational spaces.

It is pleasing to note that over 50% of the proposed development will comprise of green/open space, including recreational spaces and playing fields. It is vital that the playing fields should be a level as possible! There is a brief mention of a skate park, ideally this should be located away from a residential area as noise can be an issue.

Mention is made about cycling routes for work or to access facilities in Harlow, but recreational cycling especially off road is a sport enjoyed by many. Is there any area where such a facility could be incorporated into the green infrastructure? Many such riders use Epping Forest for their experiences and damage is occurring to the fragile soils within the Forest so an alternative location

would be beneficial. Are there any plans to incorporate a Man Shed into the area, perhaps near the proposed allotment?

I hope that there are discussions underway with various local organisations which are involved in encourage more active engagement in sports and other outdoor activities including life walks, rambling, wildlife observations and gardening. The route of the long-distance footpath – the Stort Valley Way should be protected and signposted within the proposed development.

The present site is seriously devoid of tree cover, and it is pleasing to note that the illustrative boards do suggest substantial tree planting. Every opportunity should be taken to increase tree cover not just in the proposed green/open spaces but within the areas designated for built development. Cognitive development is enhanced in children if their school and play areas are surrounded by trees and everyone should wake up to see a tree outside their dwelling for improved physical and mental wellbeing!

There is a wide choice of suitable tree species which would be suitable, but the majority selected should be native species to help increase biodiversity. There should be plans for a community orchard on the site. Newly planted trees require regular watering to help them become established and this must be factored in costs. Since deer are present in the area, newly planted trees will require protection from hungry deer!

Standard trees are expensive, and losses should be kept to a minimum as this will enhance the appearance of the area and provide shade and shelter too. Once established trees grow well and will require regular monitoring and maintenance. Has the cost of this been factored in and how will they be met 10 or more years down the line? Over the years EFDC has built up a reputation for being a local authority which cares for its tree scape.

Currently the land earmarked for the green infrastructure is being farmed and the microbiome within the soil may well be reduced due to the application of chemicals used to control pests. As a precautionary measure it would be advantageous to have soil samples analysed prior to any improvement works. This should include a determination of residual levels of potentially toxic chemicals within the soil and should also include base line evidence of the variety of organisms within the soil microbiome. Recent research is revealing the importance of the activities of a healthy soil microbiome to help with the process of carbon sequestration. With appropriate management it is possible to improve the quantities of the varied organisms such as fungi, bacteria worms and other invertebrates within the soil which will enhance its ability to store carbon in the future and support vibrant vegetative growth including trees and shrubs.

These plans provide for the establishment of new meadows, grassland, trees and scrub to enhance biodiversity, but this can only be achieved with appropriate management and if necessary additional watering to help with the establishment of newly planted trees. I do hope that there will be discussions with the team at Epping Forest CountryCare about this as their expertise in managing such sites in the local area is first rate. This is demonstrated by their management not just of local nature reserves but the successful establishment of the varied habitats and rich biodiversity of Church Lane Meadows in North Weald.

Hotter drier summers bring the risk of wildfires on well used grassland sites and with increased visitor pressure on the woodlands to the north of the proposed development the coniferous trees pose a greater risk of fire. It would be helpful to discuss with the local fire brigade and others suitable measures to incorporate managed fire-breaks, water supplies and strategies for dealing with necessary road closures due to reduced visibility due to smoke.

It is pleasing to that 28.8ha are to be designated as a SANG, but the design of this requires further input from those who are able to do so. Whilst there is a small wetland proposed at the southern extent of the SANG a larger waterbody would enhance it as walking beside such tranquil areas enhances the experience. It would be helpful to have local bye-laws or Public Space Protection Orders (PSPO) in place to govern use of the SANG. These could cover a range of anti-social behaviours such as dropping litter, lighting fires and dog control all designed to keep this area safe and attractive to all users.

I hope that these comments are helpful, but do please contact me if you require clarification on any of the issues raised.

I look forward to hearing about the next phase of this development.

Yours faithfully

Patricia Moxey B.Sc (Hons) FBNA

Vice President and Trustee of CPRE Essex.

CPRE Essex, registered charity no.1094178, is a company limited by guarantee, registered in England, no.4536412, which exists to promote the beauty, tranquillity and diversity of rural Essex by encouraging the sustainable use of land and other natural resources in town and country.

Please see our website for membership details or to make a donation website <http://cpressex.org.uk>

Bristow, M. et. al. 2017, Latton Priory, North Weald Bassett, Essex, Research Report Series 23/2017 (Swindon) ISSN 2059-4453

Linford, N., Payne, A, & Pearce, C., 2016 Latton Priory Farm, North Weald Basset, Essex: Report on Geophysical Surveys, April 2016, Research Report Series 29/2916 (Swindon) ISSN 2059-4453

Epping Forest District Council
Implementation Team

Our ref: NE/2023/135305/01-L01
Your ref: Latton Priory

Sent to Implementation Team mailbox
implementationteam@eppingforestdc.gov.uk

Date: 3 February 2023

Dear Implementation Team

Latton Priory Draft Strategic Masterplan

Thank you for consulting us on the Latton Priory Draft Strategic Masterplan. Please find our comments below. I apologise for the delay in our response.

Given that there are no Main Rivers on site, and the development is within Flood Zone 1 in its entirety, we don't have any major flood risk or proximity to main river concerns. We would however like to emphasise and echo what is stated in the Strategic Masterplan Framework and ensure that SuDs are incorporated as much as possible. Retaining water onsite is important to ensure that flood risk to Main Rivers downstream of the site and those living near them is not increased and where possible, reduced.

Sustainable Drainage

- It is good to see that run off rates will be reduced by 60% of present-day conditions. We would want to see this replicated across the whole site if possible. Ideally surfaces would be permeable and rainwater harvesting systems would be prevalent across the whole site, to hold back as much rainwater as possible.
- With hard standing ground and paving, there is still a risk that the reduced permeability / infiltration rates from the development will increase run off in some areas, causing ditches to be overwhelmed, ultimately inundating Main Rivers downstream. We would want to see that due care is taken to make sure this does not happen, and that properties downstream are not put at increased risk due to impermeable surfaces upstream.
- The impact of additional highway hardstanding, which increases drainage needs and may reduce soil absorption, would need to be assessed and addressed.
- There should be a further emphasis on SuDS development (not just attenuation ponds) but swales, rain gardens etc. This should be holistic for all development across the site and should all ideally be interlinked for maximum benefit. We would expect SuDS to hold back and retain as much water on an individual property basis upstream in order to prevent significantly increased discharge and run-off downstream.

River Corridors

- Although there are no Main Rivers within the red line boundary, we would still like to see sufficient undeveloped buffer zones for smaller watercourses onsite, particularly for the biodiversity benefits they provide.
- Making sure that watercourses and drains have sufficient natural buffers to hold excess flood water will ensure that flood risk is not increased to properties onsite, and that run-off passes along natural grassland and vegetation before reaching the drainage channels, allowing for increased lag times.

Future Schemes

- We aren't aware of any further flood alleviation schemes within the red line boundary that would conflict with the proposals.
- Harlow, Kingsmoor Pluvial Flood Alleviation Scheme is to the west of the site. If hydraulically and hydrologically linked, drainage and surface run off from the site must work in tandem with this and other schemes and not compromise their function

Assets – Maintenance

- There are no Main Rivers on site. Regardless, we would expect to see any assets proposed to be maintained by the riparian owner.
- Increased population and changing land use would warrant the requirement for channel maintenance to mitigate flood risk by ensuring conveyance through populated areas.

Biodiversity

- The incorporation of net environmental gain is welcome. The Masterplan should aim to secure net environmental gains and should have regard to commitments in the wider Sustainable Strategy for the area.
- We emphasise the importance of 'Green Growth' and advocate that net environmental gains are integrated within the Masterplan. For example, this is in line with the wider Sustainability Strategy goals for Gilston Park. In the application 'Land North of the Stort Valley and the A414 Gilston Hertfordshire' (East Herts ref: 3/19/1045/OUT) it states development should "Deliver a minimum of 10% biodiversity net gain by increasing species density and level of biodiversity compared to the existing situation through habitat creation, enhancement and management" (Sustainability Strategy, page 21). We would want to see this mirrored here.

If you have any questions, please let me know.

Yours sincerely

Deborah Simons
Planning Advisor

Direct e-mail HNLsustainablePlaces@environment-agency.gov.uk

End



**Epping Forest
Heritage Trust**

January 23rd 2023

To: CEG; Hallam Land Management; Epping Forest District Council; Harlow
& Gilston Garden Town

Concerns about the proposals for Latton Priory.

Epping Forest Heritage Trust

Epping Forest Heritage Trust is a membership organisation and charity dedicated to preserving and protecting Epping Forest, its flora, fauna, culture and heritage for people to enjoy now, and for generations to come. Our 1,000 plus members largely live in the various communities throughout the Epping Forest area. We have been engaged with and committed to the Forest for over 60 years and are a member of the Epping Forest Consultative Group run by the City of London Corporation.

Epping Forest is a hugely important ancient Forest, much of which is both a Site of Special Scientific Interest and a Special Area of Conservation, with iron age camps, 1,000 year-old trees and rare wood pasture habitat and species. It now faces the gravest threats that it has seen since it was first protected by the 1878 Epping Forest Act. Climate change, increasing levels of pollution and the acceleration of nearby developments have led to a reduction in the biodiversity of the Forest (flora and fauna). Neighbouring development, including plans to build 68,000 housing units in its vicinity, already threaten its resilience to pollution. Anticipated increased visitor numbers and budget cuts mean conservation, habitat improvement and maintenance are curtailed, and biodiversity is reduced.

At the same time the Forest has the potential to help us tackle the crucial issues of our time: it helps us tackle climate change by reducing temperatures and capturing carbon; it provides a vital amenity for people's health and wellbeing as a space to walk, cycle, ride, relax and enjoy. It is therefore essential that we protect and preserve the Forest not just for our own current enjoyment, but also for generations to come, and for the sake of the planet.



**Epping Forest
Heritage Trust**

Epping Forest Heritage Trust is a registered charity in England and Wales 275076 and a company limited by guarantee registered in England and Wales 1339785.

Page 21

Registered office: The Warren Lodge,
Loughton,
Essex
IG 10 4RN



That is why we have the following concerns in relation to the proposed Latton Priory Development:

We are deeply concerned that the proposals will lead to more traffic through, to, from and around the Forest, causing more pollution and damage to its flora and fauna.

The proposed development is within the 6.2 kilometre "Zone of Influence" and so increased visitor numbers are presumed.

The development, we believe, has:

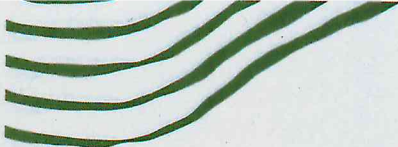
- **inadequate sustainable transport provision**, meaning that residents are more likely to use their cars to travel to, through, from and around the Forest using their cars, rather than using sustainable transport modes such as bikes or public transport. As currently planned we believe significant new car journeys will be generated towards and through Epping Forest.

We believe there needs to be much improved sustainable transport provision, including firm commitments, for example, to buses, including their planned timetables, so that **detailed transport and journey mapping can be undertaken to demonstrate that there will be no adverse impact on the Forest and the Special Area of Conservation.**

- **inadequate Suitable Alternative Natural Green Space (SANG).** Epping Forest is a significant attraction to visitors as an amazing ancient forest full of history and culture. Any genuine SANG has to be of high enough quality to deter people from making the journey to Epping Forest. We do not believe that the current plans meet this standard, and they will therefore not provide an alternative destination for people's leisure time and activities. We believe there needs to be more provision for recreational walking and cycling in the proposed SANG, with longer cycle trails and more off-road recreational cycle facilities, such as tracks for BMX and mountain biking.

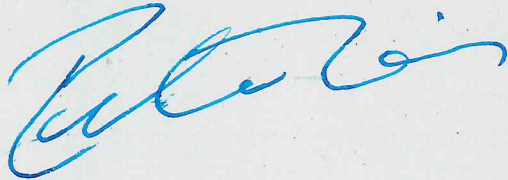
As currently planned we do not think the SANG will offer a genuine alternative to people visiting Epping Forest, and we therefore think there will be significantly increased visitor numbers, with the related increases in traffic, pollution and footfall in the Forest.





We believe the above issues are significant and need to be addressed before this proposal proceeds any further.

Yours faithfully



Peter Lewis
Chief Executive



FAO Latton Priory SMF
Latton Priory Consultation Team
Via email to: lattonpriory@ceg.co.uk

Mrs. Heather Gurden
Strategic Designing out Crime Manager
Essex Police HQ
Springfield, Chelmsford
Essex, CM2 6DN

9th January 2023

Dear Sir / Madam

Re: Latton Priory Draft Strategic Masterplan Framework Consultation 2022

The 'Essex Police – Designing out Crime Office' (DOCO), welcomes the opportunity to comment on the Latton Priory Draft Strategic Masterplan Framework Consultation 2022. We acknowledge that the documentation illustrates indicative proposals and therefore the detail within provides a holistic vision for the broader development.

Q1) Do you generally agree with the Strategic Masterplan vision? The vision is shown on the exhibition boards. Please circle your answer below and explain why

Upon review of the Strategic Masterplan Vision, the Essex Police DOCO would recommend the inclusion of embedding 'safety and security' throughout all components of the design for the new community.

Perception of crime and the fear of crime can be an influential factor in determining the synergy and ongoing sustainability of the wider community. Essex Police recommend adopting crime as a material consideration and the foreseeability of crime throughout. In doing so will maximise on the opportunity to apply 'Crime Prevention Through Environmental Design' (CPTED) practices.

The Designing out Crime Office support the creation of environments that creates a sense of place and are inclusive for all. The pertinence of creating spaces that do not encourage crime and improve feelings of safety is reflected across national campaigns such as 'Violence against Women and Children Strategy'.

Q2) What are your top three priorities for the Strategic Masterplan? Please put a tick next to the three priorities from the list below

Due to nature of the organisation, we are not able to isolate three specific priorities for the Strategic Masterplan. However, Essex Police support the notion of promoting a safe built environment, encouraging healthy communities and places of work that are safe and accessible for all.

Q3) Do you agree with the general layout as shown on the Masterplan (this can be seen on the exhibition boards and in Section 6: The Framework Masterplan of the draft SMF document)

The DOCO would recommend early liaison with the *Essex Police – Roads Policing Team* to clarify the primary / secondary road provision and proposed subsidiary access routes (such as that through Rye Hill Road), as to ensure that any opportunities to potential impact onto the road network have been considered.

Essex Police would request that throughout, consideration is given to emergency service access. It is essential that emergency vehicles can gain rapid access to any incident occurring within the whole development and surrounding neighbourhoods.

For specific observations relating to the general layout please refer to Q11.

Q4) The development will include a range of house types and sizes. See Section 7: Built Form and Placemaking of the SMF to read more around this topic. What homes do you feel are most needed within the local area?

Secured by Design: Essex Police support the notion of promoting a safe built environment, encouraging healthy communities and places of work that are safe and accessible. Essex Police would advocate seeking accreditation of the various Secured by Design (SBD) schemes.

Essex Police would advocate the use (wherever viable) of SBD products as they have met the appropriate standards, thus ensured both the physical security of that product but also enhance the developments sustainability goals and carbon footprint agendas.

Academic research has proven that the application of designing out crime and SBD can see up to 75% reductions in burglary and 25% for Vehicle crime and ASB. There are substantial Carbon cost savings associated with building new communities to SBD standards, i.e. replacing not only poor-quality doors and windows, but also the stolen property because of criminal acts.

Housing abutting landscape provision: Proposals indicate housing provision allocated within the proximity of landscape buffers. If not carefully designed, these areas could become a crime and ASB hot spot inducing the fear of crime.

Careful consideration is required when designing the properties that abut the proposed public realm areas. Therefore, due consideration within the design layout towards the orientation and positioning of dwellings; increasing the opportunity for natural surveillance, community interaction, engagement, and environmental control.

Q5) The development will accommodate a vibrant mix of uses as indicated in Section 8: Character Area 1 Heart of Latton Priory within the SMF. What types of activities and facilities do you think are most important for this development?

SBD: Essex Police would consider adoption and accreditation to the relevant 'Secured by Design – Commercial and School Design Guide' for the development of any neighbourhood centre, school provision and or commercial enterprise.

Employment Hub: We acknowledge that the location of the employment hub is currently being negotiated, however, when ratified, would welcome consultation prior to the pre-planning submission to ensure the opportunities to design out crime and the fear of crime have been implemented.

Q6) Section 6: The Framework Masterplan of the SMF highlights the walking, cycling and green space activities proposed at Latton Priory. Which of the following do you feel is more important to provide here?

From an 'Open Space, Recreation and Play perspective', Essex Police acknowledge the inclusion of safety within the Draft Masterplan as below:

"The detailed design will deliver safe and sensitively located sociable streets and spaces, with well-orientated buildings that provide for good natural surveillance"

We would welcome the opportunity to discuss the inclusion of the below within the proposed design code and management and maintenance policies prior to the reserved matters stage.

Public Realm: Appreciative that the current proposals provide a holistic overview and considerate of sustainability agendas, it is important to ensure the design of all public realm areas balance appropriate levels of connectivity with permeability, and do not encourage crime and ASB. This will be pertinent where Public Rights Of Way intersect with proposed housing or community buildings.

Lighting Provision: Lighting plays a pivotal role in deterring criminal activity, but also promotes a feeling of safety within that space. When designing both public and private space, (and when applied

and designed correctly), lighting can reduce the potential for crime. Essex Police would recommend inclusion of detailed lighting design, evidencing current relevant standards and or relevant industry standards.

Landscape Strategy: It is important that when considering open spaces, to pay significant attention to the design and layout of landscape plans, play areas, residential and public realm space etc, as if not effectively designed these spaces could be conducive to crime and ASB. If designed appropriately will enhance the Health and Wellbeing of all.

Allotment Design: We would welcome the opportunity to discuss the proposed location of the allotment provision, as current proposals limit natural surveillance and could be potential to generate crime, the fear of crime and ASB.

Sport Pitch Provision: Essex Police would wish to seek clarity regarding the delineation between the school boundaries and the sport pitch areas as to ensure the space is used effectively and doesn't become a crime generator.

Street Furniture: Careful consideration needs to address the materials used for external furniture and aesthetics such as seating, planters, and play equipment, ensuring they are risk commensurate and fit for purpose i.e., vandal, graffiti, and arson resistant.

Play areas: We would welcome early consultation to ensure that the play areas are designed to become an integral part of the residential development as opposed to crime generators. Consideration needs to be given to opportunities to encourage natural surveillance and ownership of these spaces. Play area design needs to be cognisant of proposed and new landscaping provision.

Q7) The policy requirement set out in Epping Forest District Council's Local Plan policy requirement is for five traveller pitches. Three potential locations are marked on the masterplan shown on the exhibition boards and more detail is provided within Section 6 of the SMF. Please identify below which of the sites you think would be the most appropriate location

Essex Police would request at the appropriate stage within the planning process early consultation with the DOCO regarding the location, proximity, and accessibility of the proposed site. This is to ensure that the relevant consultations within Essex Police are made to enable an integrated co-existence between the site and the local community.

Q8) Sustainable travel is a key focus of the proposals and includes a mobility hub at the site to encourage the use of green modes of transport. More information is provided within Section 6: The Masterplan Framework of the SMF. What do you think this should incorporate?

Safe System Approach: Due diligence is required for the design of all multi use Road layouts i.e. where cycle provision can safely travel alongside vehicles. A *risk-based needs assessment* would encourage the identification of the usage, associated risk with the increased accessibility (i.e. use by pedestrians, cyclists, and equestrians) and allow for risk commensurate measures to be implemented.

Consideration is requested by developers to use the "Safe system approach" when designing local roads in and around the development. This will take into account considerations of various road user groups who wish to access these roads.

EV Charging Points: The DOCO would recommend due consideration is given to the security provision for Electrical Vehicle Charging points in both public facilities and private parking. Early consideration will mitigate the opportunities associated with this crime type. We would welcome consultation regarding the infrastructure, proposals, and management of EV charging points.

Secure Bicycle Storage: With a focus on sustainable travel, consideration needs to be given to the secure external storage facilities and bicycle security, be this within the home environment or within communal bicycle stores.

Q9) More information about the approach to sustainability can be found in Section 9: Sustainability, Phasing and Stewardship within in the SMF. What do you think is most important in terms of the environment and sustainability in connection with the Latton Priory site?

Stewardship: It is imperative to address the need of a ‘capable guardian’ across the development, be that a physical manifestation or and public perception. This can include anything from a robust physical target hardening measures such as access control systems and CCTV, to a public facing guardian; both amalgamating to maximise perception of safety (for the residents) whilst minimising criminal opportunity (target hardening).

Management and Maintenance Plan: A robust management and maintenance plan will be pivotal to the success of the development. This will ensure the health, wellbeing, and safety of the residents and those that utilise the facilities within. Within the further detailed stages of the design, Essex Police would welcome the inclusion of a proposed ‘Management Plan’ or ‘Guidance Operator Plan’ submitted with the application.

Phased Construction: Site and construction compound security will be crucial for all phases of the construction until all works are completed. Essex Police recommend a robust security regime to ensure the site does not encourage crime and ASB. Security plans and policies will be required for not only the site, but offices, mechanical plant, machinery, building supplies, tools, and other vehicles. Security for the construction phase must be planned before work starts and adhered to throughout the construction.

Q10) Updates will be provided on www.lattonpriory.co.uk. How would you like to be kept informed as this development progresses? If you would like to leave contact details below please be aware that this would be shared with the developers (CEG/Hallam) and Epping Forest District Council. The privacy policies are available on the relevant websites.

The Designing out Crime Team would be happy for the below details to be stored and shared with the developers and Epping Forest District Council and used to contact us in relation to the Latton Priory development.

Email address: designingoutcrime@essex.police.uk

FAO: Designing out Crime Office

Q.11 If you have any general comments, queries, or ideas, please state these below and use extra paper as required

Creation of Safer Places: Essex Police acknowledge the impact of Sir Frederick Gibberd’s principles have had on design, ensuring that design integrates innovative architecture, road design and landscape architecture.

The Designing out Crime Office support the creation of environments that creates a sense of place and are inclusive for all. Aligned to Gibberd’s principles, Essex Police would advocate the below tenants are embedded within future design, (as reflected within National Policy):

- **Access and movement:** Places with well-defined routes, spaces and entrances that provide for convenient movement without compromising security.
- **Structure:** Places that are structured so that different uses do not cause conflict.
- **Surveillance:** Places where all publicly accessible spaces are overlooked.
- **Ownership:** Places that promote a sense of ownership, respect, territorial responsibility, and community.

- **Physical Protection:** Places that include necessary, well-designed security features.
- **Management and maintenance:** Places that are designed with management and maintenance in mind, to discourage crime in the present and future.

Alignment of the above, alongside Sir Frederick Gibberd's and Ebenezer Howard's garden city philosophies, will equip the design of communities for the modern age, whilst fulfilling safe, inclusive, and participatory community agendas.

Heritage Considerations: Sometimes heritage becomes an afterthought and measures put into place within a building development that may be to the detriment of a heritage asset, for instance an asset that once had good natural surveillance and passage of the public, becomes within an isolated location with little natural surveillance.

Design Codes: Essex Police welcome the implementation of a Design Code for the development, as the use of codes ensures a level of consistency, quality and sustainability across the whole development. The DOCO would welcome working alongside the developer and Epping Forest Council to ensure that all opportunities for crime are 'designed out' and embedding crime as a material consideration throughout.

Health Impact Assessment: Constructing well designed places, buildings and communities that promote both sustainable communities and health and wellbeing is an objective that the Essex Police widely supports; however, it is imperative that they must also be safe, secure, and accessible. This can be evidenced within a 'Health Impact Assessment', as mitigating the opportunities for crime is not only about reducing and preventing injury and crime, but it is also about building strong, cohesive, vibrant, and participatory communities.

Broader Connectivity / Levelling Up agenda: Essex Police would encourage discussions to ensure alignment to the wider connectivity across the development. Consideration needs to be given to guarantee all measures are taken to mitigate against potential community tension.

Parking Considerations: The design of vehicle parking areas will need to encompass various security components such as lighting, landscaping and access and egress considerations and this will need to be reflected within the Design Code.

Powerlines: Where applicable, Essex Police would recommend liaison with the Counter Terrorism Security Advisors regarding the safe use and adoption of powerlines.

Prior to the submission of the outline planning permissions or design code, the Designing out Crime Team would welcome consultation as part of the planning process, and if there are any further queries around embedding designing out crime practices within the project, please do not hesitate to contact designingoutcrime@essex.police.uk.

Yours Faithfully



Heather Gurden AD Cert ED&CP, LCGI, MSyI, CAS
 Strategic Designing Out Crime Officer (SDOCO)
 HQ Local Policing Support Unit
 Email: designingoutcrime@Essex.police.uk

Harlow Civic Society Response to Latton Priory Draft SMF Consultation

Overall Comments

Harlow Civic Society recognises the need for development in and around Harlow and supports the overall Garden Town Vision and the guidance and policies that have been produced by the Harlow and Gilston Garden Town Partnership (HGGT).

Broadly, we support the approach and principles set out in the SMF for the plans within the Latton Priory area. We welcome the influence of the HGGT guidance and the TCPA Garden City principles. If realised in practice this would, in our view, result in a higher quality place than some other recent developments.

This site is fundamentally an extension to Harlow, although it is within the Epping Forest District. As the SMF states, it must be integrated with Harlow. A key consequence of this is that the tightly drawn boundaries of Harlow must be extended to include this development. We recognise the political challenges in achieving this but believe that this is inevitable in time; it makes sense to do this as soon as possible in our view. At Church Langley, the extension of Harlow's boundaries happened at the same time as the development proceeded.

The Planning authorities and HGGT must ensure that the approach in the SMF is reflected in all detailed planning applications and that appropriate conditions are attached to planning permissions so that what is documented in the SMF is carried through in full to the development.

Our main concern is about how the site integrates with the existing layout of Harlow, given that Harlow has a definite southern boundary as set out in the original Gibberd Masterplan and highlighted in the SMF. We see issues with the connectivity to Harlow and the impact on neighbouring areas, particularly in relation to roads and buses, which we feel are not fully addressed in the SMF. We make further comments about this later in this response.

Location and Landscape Setting

We have previously opposed development in this area due to concerns about breaching the Rye Hill ridge within which Harlow was planned to sit, as is documented in the SMF. We note the analysis in the SMF of views and sightlines from the surrounding area, notably the view from Harlow Town Centre south to the SMF site location.

We support the 'build to' line below the ridge and we agree that it is critical that this is adhered to so that the overall approach of Gibberd's original Masterplan is not broken. Subject to this we can accept the principle of development on this site, notwithstanding our concerns about integration with the rest of Harlow. We do, however, feel that it is the least suitable site of all those set out in the HGGT vision.

From the above, it follows that no development should take place to the south of the 'build to' line beyond the timescales of current local plans.

Vision and Design Principles

We support the vision and design drivers and principles set out in the SMF. We note the analysis of the SMF against the HGGT sustainability checklist; we regard achievement of the items in this list as essential.

Integration with Harlow

The SMF rightly considers the essential integration which must take place with Harlow in some detail.

We support the extension of Harlow's north-south green wedge into the site and the connections to existing footpaths, bridleways and cycleways.

The main issue that we see is that of road links via Rye Hill Road. This will be a circuitous route to other parts of Harlow and has limited capacity even assuming that the objective that 60% of journeys will not be by private car is achieved.

Green Infrastructure

We support the plans for green and blue infrastructure and the intention to create an environment encouraging an active lifestyle.

Housing

We support the inclusion of all types of housing and tenures and the intention to provide significant affordable housing. The SMF states 'up to 40%' – we firmly believe that it should certainly be 40% as this is the area of greatest local need. There is no specific mention of social housing; our view is that a significant proportion must be of this kind.

We welcome the statements about high quality design and place that appear throughout the SMF.

Connectivity and Movement

We support the movement principles set out in the SMF and recognise the intention to create the conditions for most of the travel to be by sustainable means.

We support the provision in the plan for links to the north-south sustainable transport corridor (STC). It is nevertheless essential that bus services should be provided to the site at the same time as the first homes are occupied, subsidised as necessary, and independently of the development of the full STC.

Walking and cycling links to the rest of Harlow must also be in place at first occupation.

As mentioned above, the key challenge we see is the road links to Rye Hill Road and also to and via London Road. Given suitable alternative modes of transport, the limited link via Rye Hill Road may deter some private car use; we believe that it will still be inadequate in practice.

We have previously raised concerns elsewhere about using the north-south STC along the green wedge as a bus route also due to the risk that this develops into a public road. Given the challenges of the road link via Rye Hill Road there may later be proposals to put a road link through the green wedge. We would be strongly opposed to this.

Land Use, Facilities and Infrastructure

We agree with the land use plans set out in the SMF with a local centre and facilities within walking distance.

We agree that a primary school is essential in this site but feel that a secondary school could not be supported by a development of the size proposed by itself.

We note that Health authorities have said that there is no need for Health provision on the site. We would accept that a multi-disciplinary Health Centre of the size of Lister House or Keats House could not be justified by this site alone. We would like to understand where it is envisaged that primary care for residents here will be provided and what impact would be expected on existing Harlow facilities. We feel that consideration could be given to providing a smaller centre, perhaps part-time, at Latton Priory.

We note the proposed low level lighting scheme for the green corridors and believe that all external lighting should be designed to minimise light pollution and to maintain dark skies as far as possible.

We welcome the recognition of the importance of sculpture in Harlow. Public Art should be commissioned for Latton Priory in consultation with Harlow Art Trust.

We support the approach given to the integration and protection of heritage assets: the proposal for a long-term management plan for the Rye Hill Moat and the SANG adjacent to the Latton Priory farm site.

Comments on Harlow

There are many comments in the SMF about existing facilities and design of Harlow, some of which we disagree with; though we do not raise them here as they do not impact our comments on the SMF.

There are also several incorrect statements, which, although they do not materially affect the approach set out in the SMF, nevertheless concern us, as they send us a message of poor research and perhaps carelessness and lack of attention to detail. We list the most significant ones we noted below.

First is the statement that Harlow was developed around the private car (p181 of the SMF). This is not the case. As Gibberd stated in 'The Design of Harlow', at the time the Masterplan was drawn up only around 10% of households owned a car; the design reflected traffic engineering of the time and did not envisage current levels of ownership. There are certainly issues caused by this in the Harlow of today, but we do not see that it can be said that Harlow was developed around the private car. Given the neighbourhood and sub-centres with facilities within walking distance and the cycle network, we would say the opposite was the case.

The SMF refers to Harlow's Local Centres such as Staple Tye and Bush Fair. It also refers to them throughout as 'Hatches'. They are Neighbourhood Centres originally designed to concentrate in one place as many different activities as possible including around 30 shops. The 'hatches' are the sub-centres at the next level down in the hierarchy with a few shops intended to provide everyday needs in each local area. Examples near Latton Priory are Maunds Hatch and Clifton Hatch. The local centre planned for Latton Priory would be nearer in size and scope to the sub-centre hatches.

The SMF states that Harlow bus station has been recently refurbished (p28). This is incorrect. While it was partially redeveloped some years ago, the area is in a poor state and while there have been plans for refurbishment they have not yet been carried out. After the publication of the SMF, planning permission was given on 11th January for a major regeneration of the bus station and Terminus Street funded by £15m from the government's Towns Fund.

The SMF also states that there is a Park and Ride from Harlow Town Station (p28). There is car parking for train users but there is not currently a Park and Ride.

Harlow Civic Society
January 2023

contact@harlowcivicsociety.org.uk

Epping Forest District Council
Implementation Team

Our ref: NE/2023/135305/01-L01
Your ref: Latton Priory

Sent to Implementation Team mailbox
implementationteam@eppingforestdc.gov.uk

Date: 3 February 2023

Dear Implementation Team

Latton Priory Draft Strategic Masterplan

Thank you for consulting us on the Latton Priory Draft Strategic Masterplan. Please find our comments below. I apologise for the delay in our response.

Given that there are no Main Rivers on site, and the development is within Flood Zone 1 in its entirety, we don't have any major flood risk or proximity to main river concerns. We would however like to emphasise and echo what is stated in the Strategic Masterplan Framework and ensure that SuDs are incorporated as much as possible. Retaining water onsite is important to ensure that flood risk to Main Rivers downstream of the site and those living near them is not increased and where possible, reduced.

Sustainable Drainage

- It is good to see that run off rates will be reduced by 60% of present-day conditions. We would want to see this replicated across the whole site if possible. Ideally surfaces would be permeable and rainwater harvesting systems would be prevalent across the whole site, to hold back as much rainwater as possible.
- With hard standing ground and paving, there is still a risk that the reduced permeability / infiltration rates from the development will increase run off in some areas, causing ditches to be overwhelmed, ultimately inundating Main Rivers downstream. We would want to see that due care is taken to make sure this does not happen, and that properties downstream are not put at increased risk due to impermeable surfaces upstream.
- The impact of additional highway hardstanding, which increases drainage needs and may reduce soil absorption, would need to be assessed and addressed.
- There should be a further emphasis on SuDS development (not just attenuation ponds) but swales, rain gardens etc. This should be holistic for all development across the site and should all ideally be interlinked for maximum benefit. We would expect SuDS to hold back and retain as much water on an individual property basis upstream in order to prevent significantly increased discharge and run-off downstream.

River Corridors

- Although there are no Main Rivers within the red line boundary, we would still like to see sufficient undeveloped buffer zones for smaller watercourses onsite, particularly for the biodiversity benefits they provide.
- Making sure that watercourses and drains have sufficient natural buffers to hold excess flood water will ensure that flood risk is not increased to properties onsite, and that run-off passes along natural grassland and vegetation before reaching the drainage channels, allowing for increased lag times.

Future Schemes

- We aren't aware of any further flood alleviation schemes within the red line boundary that would conflict with the proposals.
- Harlow, Kingsmoor Pluvial Flood Alleviation Scheme is to the west of the site. If hydraulically and hydrologically linked, drainage and surface run off from the site must work in tandem with this and other schemes and not compromise their function

Assets – Maintenance

- There are no Main Rivers on site. Regardless, we would expect to see any assets proposed to be maintained by the riparian owner.
- Increased population and changing land use would warrant the requirement for channel maintenance to mitigate flood risk by ensuring conveyance through populated areas.

Biodiversity

- The incorporation of net environmental gain is welcome. The Masterplan should aim to secure net environmental gains and should have regard to commitments in the wider Sustainable Strategy for the area.
- We emphasise the importance of 'Green Growth' and advocate that net environmental gains are integrated within the Masterplan. For example, this is in line with the wider Sustainability Strategy goals for Gilston Park. In the application 'Land North of the Stort Valley and the A414 Gilston Hertfordshire' (East Herts ref: 3/19/1045/OUT) it states development should "Deliver a minimum of 10% biodiversity net gain by increasing species density and level of biodiversity compared to the existing situation through habitat creation, enhancement and management" (Sustainability Strategy, page 21). We would want to see this mirrored here.

If you have any questions, please let me know.

Yours sincerely

Deborah Simons
Planning Advisor

Direct e-mail HNLsustainablePlaces@environment-agency.gov.uk

End



Planning Policy and Implementation
Epping Forest District Council
By Email

Direct Dial: 01223 582746

Our ref: PL00791940

26 January 2023

Dear Epping Forest District Council Implementation Team

Re: Latton Priory Masterplan

Thank you for consulting Historic England on the Latton Priory Masterplan. As the government's statutory advisory body on the historic environment we are keen to seek the conservation and enhancement of the historic environment for future generations at all stages of the planning process. We are therefore pleased to have been consulted at this stage.

Historic England Advice

The masterplan is for the future development of up to 1500 new homes, a new mixed use local centre and other areas dedicated to commercial and community facilities, schools and sport pitches, and associated transport infrastructure and green spaces including a Suitable Alternative Green Space (SANG). We note the site is allocated for development in the emerging Epping Forest Local Plan 2011-2033, and is part of the Harlow and Gilston Garden Town, designated by Government in 2017.

The development site contains or is in the vicinity of a number of designated heritage assets. Most notable are two scheduled monuments, as well as a number of listed buildings including two at GII*. To the south-east of the site and sited on the boundary as set out in the masterplan documents is the 14th Century Augustinian Priory church of St John the Baptist at Latton Priory, the rough extent of which is scheduled, while the priory building - now used as a barn - is GII* listed. The adjacent farmhouse is also listed at GII*. Within the development site, located towards the south-west corner, is the Moated site 350m South of Dorrington Farm also known as Rye Hill Moat

Latton Priory is an important example of a small Augustinian foundation of the 12th Century surviving within its landscape context. The site of the Priory is defined by the extant western arm of the moat, the former line of the northern arm, a large boundary ditch which runs parallel to the in-filled eastern arm and a large pond to the south, outside the development boundary, which is separated from the moated inner precinct by a meadow rich in earthworks. The much-altered remains of the priory church



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk





comprise the lofty crossing with truncated tower above, a short section of the truncated nave and the truncated remains of both transepts. Adjoining the church to the east, on the site of the former presbytery and to the south, built within the remains of the transept, timber-framed barns of the late 18th and early 19th centuries attest to the conversion of the priory church to agricultural use in the post-medieval period. As noted above, to the south-west of the church and likely built on the footprint of the priory Frater (refectory), the 18th-century, red-brick farmhouse is also a separately listed structure (GII*).

The Rye Hill moated site includes a rectangular island measuring some 80m east-west by a minimum of 64m north-south, raised approximately 0.5m above the surrounding ground surface. The island is contained by a moat or ditch measuring approximately 2m in depth and up to 10m wide on the west, north, and east sides. The southern arm of the moat and the southern ends of the eastern and western arms have been in-filled and are, together with the southern end of the island, now incorporated into the ploughed field to the south. Despite this, the monument survives well, although is presently tree covered and therefore potentially vulnerable to disturbance owing to this.

The island will retain buried evidence for structures and other features relating to the period of occupation. The buried silts in the base of the ditch, and particularly in the in-filled sections, will contain artefacts relating to the period of occupation and environmental evidence for the appearance of the landscape in which the monument was set. The majority of moated sites served as prestigious aristocratic and seigneurial residences with the provision of a moat intended as a status symbol rather than a practical military defence. The peak period during which moated sites were built was between about 1250 and 1350 and by far the greatest concentration lies in central and eastern parts of England. They form a significant class of medieval monument and are important for the understanding the development of settlement and the distribution of wealth and status in the countryside.

Both the monuments above, as well as potentially are of national importance, and along with the two Grade II* buildings are heritage assets of the highest significance. Their conservation, including avoiding harm or loss through development in their setting, must be afforded great weight in line with that significance.

The proposed development reflects a significant change to the wider setting of both monuments and listed buildings, although we note that there would be no direct impacts. Specifically, the proposed development will result in harm to the significance of the Rye Hill Moat and Latton Priory as a result of development in its setting, which in both cases changes the presently rural character and quality of the landscape setting to a more developed and urbanised one. This effect is more pronounced for Rye Hill Moat, where the development parcel south of East West Avenue will encroach to a significant degree on the setting of the monument to the north, whilst the sport pitches



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk





immediately adjacent to the east will also have an impact. The impact on Latton Priory's present rural setting will be less, but the uncertainty around the route of the proposed link road presents a particular risk of further impact to the north-east, while the eastern development parcel will inevitably have some impact owing to the development of the eastern neighbourhood with associated activity, light and noise pollution.

Paragraph 189 of the National Planning Policy Framework 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 existing and future generations. Paragraph 190 states that plans, which we consider includes masterplans such as this, should set out a positive strategy for the conservation and enjoyment of the historic environment, including: the desirability of sustaining and enhancing their significance and putting them to viable uses consistent with their conservation; highlighting the social, cultural, economic and environmental benefits they can bring; the desirability of new development making a positive contribution to local character and distinctiveness, and finally that plans should seek opportunities to draw on the contribution made by the historic environment to the character of a place. Paragraph 199 makes clear that great weight should be given to the asset's conservation when considering impacts of any proposed development, irrespective of the amount of harm. Paragraph 200 states that any harm should require a clear and convincing justification. Paragraph 202, which we consider is engaged by this proposal, makes clear that less than substantial harm should be weighed against the public benefits of the proposal. We also highlight that paragraph 206 sets out that opportunities should be sought for new development in the setting of heritage assets to better reveal the significance of those affected.

Paragraph 126 makes clear that the creation of high quality, beautiful and sustainable places is fundamental to planning and development. Good design is a key aspect of this. Paragraph 128 of the NPPF sets out that Design Codes should be prepared that are consistent with the principles set out in the National Design Guide and National Model Design Code, reflecting local character and design preferences. Paragraph 129 highlights that landowners and developers may wish to prepare design codes in support of a planning application for sites they wish to develop, and that all such codes should be based on effective community engagement and reflect local aspirations for the area. Paragraph 130 makes clear that developments should, amongst other things, be visually attractive as a result of good architecture, layout and landscaping, and should be sympathetic to local character and history, including the surrounding built environment and landscape setting, establishing a strong sense of place. Paragraph 134 makes clear that development that is not well designed should be refused, especially where it fails to reflect local and government design policies and guidance.

Historic England does not object to the proposed development, and we consider that overall the illustrative masterplan exhibits positive elements that reinforce the tradition



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk





of masterplanning and placemaking embodied by Harlow New Town (and indeed other British New Towns such as Stevenage and Hemel Hempstead). This includes the emphasis on the incorporation of existing natural features and mature landscaping into the masterplan as ‘green fingers’, and creation of defined neighbourhoods that, in principle at least, incorporate active travel infrastructure. We note that the masterplan is presently at illustrative stage, but in line with Section 12 of the NPPF, we would strongly encourage that the masterplan is accompanied in due course by a site wide Design Code that secures a coherent approach to the more detailed aspects of the development across delivery phases including form, scale, mass, style, layout, use of appropriate materials, the layout of boundary treatment. We would strongly encourage that this be undertaken supported by a more detailed characterisation exercise that takes into account the positive aspects of Harlow New Town and surrounding areas and incorporates them to reinforce positive locally distinctive characteristics, whilst also bringing the design of the Latton Priory extension up to date with current design guidance such as the National Design Guide, Manual for Streets, and others.

Such a code should also consider the layout and quality of the streetscape in terms of its accessibility and the design of streets, including pedestrian and cycle provision, the design and provision of street furniture, and use of surface materials. At present, the masterplan does not incorporate clarity and detail on the design of these elements, creating a risk that they are poorly considered. We would strongly recommend that Active Travel England are consulted at this early stage as the statutory consultee on these issues.

We highlight that 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 therefore welcome the masterplan’s identification of the opportunities for heritage benefits to accrue on page 43, where it says “*The development provides a unique opportunity to improve the condition of the monument and to provide interpretive material on the moated site and Latton Priory and help promote a greater sense of place and time depth for the residents of the new community*”.

However, whilst the masterplan does highlight this opportunity, we consider that more could be done to commit to integrating particularly the Rye Hill moat, but also Latton Priory, into the positive place making that the masterplan seeks. This includes for example considerations of managed access, their interpretation and presentation as heritage assets, education and wayfinding on adjacent public rights of way, and of course ongoing conservation and management. At present the treatment of Rye Hill moat within the masterplan appears ambivalent, rather than fully considered. For example, no access to the monument is suggested, and specific opportunities for integration into education and recreation activities could be better explored and





highlighted. Enhancement through tree management and the reinstatement of the lost arms of the moat is something we would encourage on top of any interpretation. We would like to see a commitment to the long-term ownership and management of the monument set out, and subsequently this should be agreed via the Section 106 for the development. Historic England would consider this a key heritage benefit to be welcomed.

With regard to Latton Priory, we consider that there is potential to secure heritage benefits through the production of a conservation management plan for this monument complex that would seek to secure its conservation and enhancement over time. Whilst we note that the monument is outside the area controlled by the applicant, the development will nonetheless cause some harm to the significance of the abbey site through development in its setting, in particular via the link road. The production of an agreed management plan funded by the Section 106 agreement would therefore be a significant heritage benefit to set against this harm. We would encourage that this opportunity is explored with the controlling landowner.

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

Yours sincerely,
Edward James
Historic Places Advisor, East of England
Edward.James@HistoricEngland.org.uk



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk





Our ref: Latton Priory Masterplan
Your ref:

Mark Norman
Operations - East
Woodlands
Manton Lane
Bedford MK41 7LW

Via Email

Direct Line: 0300 470 4938

17 January 23

Dear Sir,

M11 Latton Priory Master Plan Consultation

National Highways welcomes the opportunity to provide comments on the Master plan for the proposed Latton Priory development.

National Highways has been appointed by the Secretary of State for Transport as a Strategic Highway Company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery part to national economic growth.

In responding to this consultation, we have regard to Dft Circular 01/2022 The Strategic Road Network and the delivery of sustainable development (the Circular) which sets out how interactions with the Strategic Road Network should be considered in the making of local plans. Paragraph 16 of the Circular sets out that :

In addition to the Dft Circular 01/2022 the response set out below is in accordance with the National Planning Policy Framework (NPPF) and other relevant policies. The Climate Change Committee's [2022 Report to Parliament](#) notes that for the UK to achieve net zero carbon status by 2050, action is needed to support a modal shift away from car travel. The NPPF supports this position, with paragraphs 73 and 105 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 104 and 110 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up.

Moreover, the build clever and build efficiently criteria as set out in clause 6.1.4 of [PAS2080](#) promote the use of low carbon materials and products, innovative design solutions and construction methods to minimise resource consumption.

These considerations should be weighed alongside any relevant Local Plan policies to ensure that planning decisions are in line with the necessary transition to net zero carbon.

In due course National Highways will expect a transport assessment, the content of which should be agreed with both highway authorities. This should clearly set out the developments transport impact and mitigations and will need to include M11 J7.

A travel plan with a clear targets, monitoring and a strategy to ensure targets are stuck too, will be needed.

Turning to specific comments on the masterplan.

It is noted that there are a number of proposed pedestrian and cycle route connections to the existing town of Harlow this is welcomed. These are to be hard surfaced, light and otherwise compliant with LTN 1/20

I have some concern that the local centre is disconnected form the eastern part of the development by green space this could discourage walking and cycle trips to the centre particularly during the hours of darkness.

If cycling is to be encouraged there must also be adequate changing areas and secure equipment storage provided at places such as employment and shopping areas and although early in the design process thought should be give to cycle and scooter parking and storage at both destination and origin of the trip. At employment and shopping centre the parking facility should be close to the entrance and obvious.

I hope you find these comments useful

Yours faithfully



Mark Norman
Spatial Planning Manager
Operations (East)
Email: mark.norman@highwaysengland.co.uk

Latton Priory Planning draft Strategic Masterplan Framework (SMF), by CEG / Hallam

Consultation released 15/11/2022 deadline 9/1/2023

The relevant committee of the Epping Society has considered the draft SMF, and want to express a number of reservations. These are listed below, with general comments first and page-referenced points later.

Page	Comment
a	The document is titled a “draft Strategic Masterplan Framework”; but we are uncertain of the status of this – will it be followed by an actual Masterplan, with further consultation? If so, when is that likely to be published and how long would the public consultation last?
b	This document was prepared in October 2022, made public mid-November, but makes no reference to EFDC ED145 “further Main Modifications to Local Plan”, also dated October. It does not look as if any likely changes to the Local Plan have been anticipated, nor contradictions avoided. There are also ED documents published after ED145 which might be relevant.
c	No specific mention is made anywhere that Latton Priory is in Green Belt land; nor is there an explanation of the “exceptional circumstances” required for such development, under the National Planning Policy Framework.
d	There is no justification given for the need for such a development – has there been market research that 1000+ families want to live there?
e	We are not convinced that the geo-politico-social implications of Latton Priory have been fully understood, or addressed. Will it be seen as part of Harlow or Epping, for instance? This matter will impact house sales & prices, place-shaping, in terms of where people feel they belong, community spirit etc. What will road signs say? What will be the postcode? Which Parliamentary Constituency?
f	All aspects of this draft SMF must be viewed in the light of recent statements by the Prime Minister & Michael Gove about Housing Targets, Green Belts, local infrastructure and residents’ views. In effect this development is unnecessary, unwarranted and unwanted; it should at the very least be paused for reflection. https://mcusercontent.com/3036c690a1180c4edb90ae1a0/files/6d2b9179-a5d5-2d7d-07ab-db0d0264c3b4/22125_Michael_Gove_MP_to_all_Conservative_MPs.pdf
16	There is a significant lack of clarity about the number of homes. On page 16 it is “1050 by 2033”; yet later on developers are calling for 1500, to make the facilities viable. Does this imply that if only 1050 are built, the development cannot realise this SMF? Is the document simply careless, or deliberately misleading?
28	Cycling times – initially it appears that these are measured in a straight line, but the roads are not straight; also what is the real-world potential for local roads to safely carry large numbers of cyclists, given that some eg Rye Hill Road are narrow and twisting, others eg London Road have in places 60 mph speed limits? An appendix does have an isochrone map, to be fair, but time is not necessarily the chief consideration.
28	The bus table is indistinct. Buses to Epping listed as “one service”. To Epping tube - nil on the map. What reasons are there to believe essential new bus provision will happen, and are there Statements of Common Ground to support that?
30	The A414 road is described as already having “localised capacity issues in peak times” but in reality there are regular lengthy queues, and this plan will add to them. When problems affect the M11 local roads almost gridlock. Incidentally congestion affects electric cars and buses as well as other vehicles.
44	Power lines “can be grounded” is not a strong enough position. If it has been planned it must have been costed, otherwise it cannot validly be part of a Masterplan. Such statements must be clearly committed to or else removed from the document otherwise confusion may be occasioned to say nothing of misleading. Few people would want to live under/near power lines; so there should surely be a buffer zone?

44	The Green Belt boundary is renamed as a “build-to line” – but they are different creatures. One should not build up to a GB boundary if there will be a negative impact on that GB, whereas it is no doubt assumed that development can run up to a build-to line.
50	Denigratory reference to other local areas is undesirable as it risks stigmatising neighbours (see e.); also it is not very polite to the no-doubt eminent & worthy architects of their time?
52	Curving streets ARE in character with the area. Huge neighbourhoods of Harlow were deliberately and carefully designed like that. Some (eg Bishopsfield) won national design awards.
54	What is the actual number of parking spaces intended? EFDC has strict views on this. Potential residents will ask this question; we would go as far as saying that many people will not move to LP without car parking facilities. Developers must have a number in mind as there is an impact on housing densities and property prices for sale or rental.
54	“Charging points for every home” - we agree that this is a crucial Green measure, but it unfortunately runs counter to EFDC’s latest “further Main Modifications”. We can see no reference to the EFDC Climate Emergency Action Plan – globally critically important.
	The many points about Sustainable Transport and Modal Shift are noted, and there are successful examples of these developing, chiefly in cities. However Latton Priory will be a semi-rural neighbourhood. For example, just how firm are arrangements with bus companies; are there Statements of Common Ground or contractual and funding arrangements?
56	Jobs / employment receive many mentions. However, there is no forecast for how many actual jobs will be available within the new neighbourhood? Many of the rest of the 3000 odd adult population will wish to commute at least some of the time; and it is generally held that “working from home” is diminishing from the extraordinary peak during Covid Lockdowns.
60	The Eastward road link is a very serious concern. Many residents of Epping town and surroundings are most concerned that new Latton Priory residents will seek to travel Southwards, by the London Road, either seeking access to Epping tube, or onward road travel, necessarily through Epping Forest Special Area of Conservation. Those infrastructures are already at or beyond capacity, according to EFDC data; while the Forest requires “further development must demonstrate ... no significant impact” (or words to that effect). This matter was raised during the public consultation; and we are very surprised to find that discussion described as “not contentious”. Inspector Phillips said at the Local Plan public hearings that she did not expect to see such a route, but developers seem to not recognise that as a binding authority. In an EFDC Cabinet meeting 7 /11/22, a Report was presented which was explicit that the road Eastwards was to be the primary vehicle access route; based on a 2020 commissioned report. However when the Chair (Cllr C. Whitbread) asked if consideration had been given to traffic flows Southward (i.e. towards Epping & the tube railhead) or to the likely impact on the Forest; the answer was “not yet”, but such work was “projected”. In essence – the most significant local impact of this development has not been acknowledged, far less assessed or resolved.
146	To emphasize, this Master Plan does not indicate likely traffic flows from the site outward. A transport assessment “will be submitted”. That wording suggests that an assessment has been made; so why not released? For the community already living outside the Master Plan area, this is the single most significant issue. This concern was also noted by North Weald Parish Council over 2 years ago – but has yet to be addressed. We think that concerns about this matter should be satisfied BEFORE the SMF proceeds further.
60	The Eastward road will be designed to be “less-attractive than the Sustainable Transport link” but more detail of the mechanism / example would be useful. However it will still likely be the primary vehicle access; but there is no estimate of the expected traffic flow.

70	“Paris, a 15 minute city”. A concept originally from Carlos Moreno, to reduce traffic flow in dense urban areas with good public transport and easily accessible services, explaining why Bristol & Oxford are planning pilot schemes. Not relevant at Latton Priory.
74	Photo. How much new cycle parking is planned / funded for Harlow centre or Railway station, to encourage cycling Northward?
90	Access to Latton Priory building itself? We are not sure what this means. It is private with a history of light industry / storage / lorry activity. Are the developers in a position to make commitments?
142	A number of measures of Green concern are ill-defined. Example, Rn1 calls for PV fitment as a minimum; but the Latton Priory Plan is equivocal. Likewise the commitment to ASHP is not absolute. Nothing on Grey Water, although we are in a declared National Drought Zone – and this is a fairly modest expense during construction. Can find no reference to EFDC’s Climate Emergency Action Plan
152	There is to be no medical provision. Yet one of the aims stated for this new estate is “..a healthy place to live”; the Introduction Section refers to “health..facilities”. Has there been investigation into whether local medical services have capacity, and at what time and distance to travel?
166	Tube & Rail fares – this discrepancy was raised during the public consultation. It currently pushes commuters towards Epping, not the much nearer Harlow railway (which may have greater capacity)? Are any steps in hand on this?
194	The SMF does not actually say how many car parking spaces will be provided. The promise is “to current standards” (implying the tabulated data, from EFDC T1). However the provision will “support modal shift”, i.e could be less than that? While car parking provision will be a significant factor for many potential residents; it will also have an impact on aspirational modal shift effectiveness. Arrangements will still be vital for the disabled, for visitors, delivery & emergency vehicles to have access without parking on pavements and verges, in themselves necessary for modal shift to have any chance. For those living outside the SMF it will be an indication of possible additional traffic / congestion figures. We feel strongly that this needs to be urgently clarified. (see 54)

Commented [AS1]: Contacts in and near Paris we have consulted ???

Environment Department
Juliemma McLoughlin
Executive Director Environment



BY EMAIL

lattonpriory@ceg.co.uk

Telephone 020 8532 1010

Email:

epping.forest@cityoflondon
.gov.uk

Date: 20/01/2023

Dear Sir/Madam,

City of London as Conservators of Epping Forest response to Latton Priory Strategic Masterplan Framework (SMF) Consultation 2022-2023.

Epping Forest is owned by the City of London and comprises some 6000 acres (2,500 hectares). The Epping Forest Act 1878 charged the City as Conservators of Epping Forest, with a duty to conserve varied vegetation and preserve the Forest's natural aspect.

Epping Forest is of international importance for its woodland and heathland habitats and for the presence of certain species such as the Stag Beetle. The site is designated as a Special Area of Conservation (SAC) and thus afforded full protection by law under the provisions of the Habitats Regulations (2017, as amended). It is the role of Epping Forest District Council, as competent authority, to ensure that the requirements of the Habitats Regulations are met before deciding whether to authorise any planning application. Where a particular application would be likely to have a significant effect on the SAC, an appropriate assessment and integrity test is required before that application is authorised.

The proposed Latton Priory development is situated within the 6.2km "Zone of Influence" of the Epping Forest Special Area of Conservation (EFSAC), within which it is considered that building new homes could result in more visits to the EFSAC, resulting in increased recreational pressure. In order to avoid recreational pressure in the EFSAC, it is essential that any development of this scale provides attractive visitor destinations, known as SANGS (Suitable Alternative Natural Green Space).

City of London Epping Forest Office
The Warren, Loughton, Essex IG10 4RW
Switchboard 020 8532 1010
www.cityoflondon.gov.uk

Registered Charity 232990



The Conservators observe that it is intended that over 50% of the proposed development will comprise of green/open space, with 28.8ha of this being dedicated as SANG. The landscape character of which includes new meadows, grassland, trees, and scrub with the intention to provide an onsite, attractive recreational space, with the added benefit of increased biodiversity. The Conservators agree that the SANG creation should be part of Phase 1 of the proposed development, so that it more greatly established on completion of the first phase of dwelling inhabitation.

Whilst this design and approach are observed by the Conservators as being correct and positive steps in creating a meaningful SANG that will achieve reduction in uplift of recreational pressure upon the EFSAC, the Conservators wish to make the following observations and concerns on this element of the development.

Future development to the south of the proposed SANG

The Conservators wish to state as this time, that the proposed SANG does benefit from extensive views in the southern panorama towards with the open farmland between the site and Epping Green, Epping Upland and Thornwood, with the Forest as a backdrop. These views would contribute to the attractiveness of the SANG. However, any extensive future development to the south of this SANG would greatly reduce the appeal and success.

Management of the SANG

The Conservators understand that a further consultation regarding a Stewardship Charter, is to be produced detailing the future management of the SANG and the Conservators would wish to be included in this consultation and make comments where necessary.

Fire Risk

The creation of meadows and grassland as part of the SANG allocation of the proposed development do present a significant fire risk to the site, especially for the dwellings on the eastern side of the site. This is potential issue is increased by the prevailing wind in conjunction with the aspect of the site (the site is higher than the land to the south/west and therefore would increase wind speeds).

It has been the experience of the Conservators that grassland, meadows, and scrubland present the biggest fire risk on public access sites, due to the increase footfall generating more litter (cigarettes or glass), disposal BBQs or deliberate arson. With the forecasting of drier summers and higher temperatures predicted in association with climate change, the Conservators believe that this factor must be assessed when SANG design is more greatly considered with the use of managed fire breaks.

We only need take as an example the 45 acre wild fire incident that occurred at Wanstead Flats in July 2018, where 18.2 hectares of grassland were lost. This event led to the closing of local roads and the mobilisation of 50 fire appliances from London and Essex. At the proposed location, there is a significant risk of fire spreading to more ignitable conifer plantation of Mark's Bushes (Rundell's Grove/Latton Woods) and potential for road closure of the M11 or A414. This in an area, where mobilisation of fire appliances is significantly less than the Wanstead Flats scenario, which has parallels to the fire incidents and property loss in Rainham, Essex in August 2022.

The Conservators believe this factor to be significant in the success of the SANG, as although sites can recover from fire, in the aftermath of such incidents the facility attractiveness drastically declines and fear of safety leads visitors to seek alternate options which could lead to increased visitation to Epping Forest, specifically in areas of SSSI and SAC.

Bye-laws

In part associated with the above, given the proposed scale of the development (1500 dwellings) and the developments location being immediately adjacent to the urban conurbation of Harlow Town. The Conservators would be keen to understand what (if any) local byelaws or Public Space Protection Orders (PSPO) would be in place to govern use of the SANG. The risk of fire from recreational activities, such as BBQs have been listed above. However, other forms of anti-social behaviour such as ineffective, dog control, litter, fly-grazing (which is very prevalent on Harlow Town Open Spaces) etc, all have potential to lessen the attractiveness of the SANG, resulting in the seeking of alternate green/open space options.

Recreational facilities

Whilst the play parks and sports facilities, should be expected as part of a development of such a scale. The provision for recreational walking and cycling facilities does appear to be lacking, especially considering that the SANG land is currently used for agricultural purposes and will take time to develop. The Conservators would suggest that increased multiple circular walks should be included. A good example of this is the Whitehill & Bordon SANG in East Hampshire known as the Hogmoor Inclosure, which has multiple surfaced paths of varied lengths, to accommodate different user needs.

Whilst the SANG provision, may look to accommodate walking (including dog exercise) running and access to some open space. There seems to be little provision for recreational cycling as part of the SANG, which could be accommodated with improved partnership with the Woodland Trust/Harlow District Council for a provision for both the new development and existing Harlow Town Residents.

Focal points within the SANG

From the illustrative diagram displaying the layout of the site, there doesn't appear to be any focal point (destinations) within the proposed SANG. There is a small wetland creation at the southern extent of the SANG, but given the extensive open aspect of the site, the Conservators believe that increased pond provision within SANG would enhance the appeal and continued success of the SANG.

Air Pollution

The EFDC Local Plan Policy DM22 (Air Quality) and have adopted an Air Pollution Mitigation Strategy (APMS) which sets out the actual measures that the Council will implement during the lifetime of the Plan. These measures seek to limit the increase the increase in traffic volumes through the EFSAC.

The Latton Priory development is not a car free development, and the development proposes an eastern exit onto the B1393 (London Road) which is likely to result in increased traffic volumes going south towards Epping, and specifically Epping Railway Station (Central Line). The Conservators believe that extensive modelling of traffic movements, specifically south on the B1393 would need to be more greatly presented, in order to understand how this prospective increased traffic volume would exacerbate existing traffic movements through the EFSAC.

The Conservators are grateful for the opportunity to comment on this consultation.

Yours sincerely

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Tristan Vetta', with a long horizontal line extending to the right.

Mr Tristan Vetta
Epping Forest Land Agent

**Strategic Growth and
Regeneration**

Draft Latton Priory Strategic Masterplan
Consultation 2022/23
Planning Policy
Epping Forest District Council Civic Offices
323 High Street
Epping
Essex CM16 4BZ

Civic Centre
The Water Gardens
Harlow
Essex
CM20 1WG

www.harlow.gov.uk
Tel: 01279 446258
Paul.MacBride@Harlow.gov.uk

19 January 2023

Dear Sir/Madam,

Consultation Draft Latton Priory Strategic Masterplan Framework (SMF)

Thank you for being given the opportunity to comment on the Latton Priory Strategic Masterplan Framework (SMF) document. In response to this consultation Harlow Council has the following observations to make in respect of the key sections of the document.

Role of the Masterplan

The document sets out the draft Strategic Masterplan Framework (SMF) for a proposed mixed-use scheme at Latton Priory and provides further supplementary guidance to support the site allocations supported by the related policies in the Epping Forest Local Plan. The Masterplan sets out a design led framework of key development principles to secure a co-ordinated approach to the sites development and is generally supported.

However, with regard to the terminology used in the document it is noted that both “Masterplan” and “Strategic Masterplan Framework” are used interchangeably. For the avoidance of doubt and to provide clarity only one phrase should be used. In addition, given the sites location, immediately to the south of Harlow, it is important that this key spatial relationship is acknowledged. In order, therefore, to provide context this should be explicitly referred to in this section of the document. Further it would also be helpful if the document explained the Councils expectations were in terms of how it is to be utilised by developers.

Vision

The draft Vision sets out the ambition for the site linked to the overarching objectives of the emerging Epping Forest Local Plan. Although the Vision refers to sensitive integration with

the surrounding countryside and communities it is important that Harlow is specifically referred to in order to avoid ambiguity, as in spatial planning terms the Latton Priory development represents an urban extension to the existing town with which it requires careful integration.

Planning Policy Guidance

In this section the relevant strategic planning policies in the Epping Forest District Local Plan (EFDC) are set out, and reference is also made to the National planning Policy Framework (NPPF), Harlow and Gilston Garden Town Documents and the Harlow District Local Plan, that provide further guidance. It would also be helpful to reference adopted SPD's and other guidance produced by Harlow Council, given that the site will need to be effectively integrated with existing development. In addition, reference should be made to relevant strategies and guidance produced by Essex County Council (ECC) as Highway Authority (HA) that should be referenced i.e. Parking Standards – Design and Good Practice. The SMF should be based on the strategy set out in the HGGT Transport Strategy, which embodies the requirements of Essex County Council (ECC) as Highway Authority (HA).

Site and Surroundings Context

This section describes the character of the site and its environs including land ownership, land use, transport and connectivity, landscape character, ecology and biodiversity and heritage assets. However, in setting out the context and potential constraints it does not acknowledge that the long-standing road capacity issues on the road network in south Harlow, has prompted the need to develop Sustainable Transport Corridors in order address the matter. In addition, however, whilst the supporting text acknowledges that Junction 7 experiences high volumes of traffic it does not refer to the existing impacts of traffic on Southern Way and how this would be affected by additional volumes of traffic arising from the additional 1500 residential units at Latton Priory. This is particularly important so that the previously expressed concerns of Harlow Council, in respect of additional traffic generation from the development is acknowledged and how this is to be addressed through measures set out in the SMF.

In addition, in response to the further Main Modifications Harlow Council emphasised the need for the new EFDC Local Plan to reference, the PJA access study. This study provides detailed guidance on how traffic movements on this connection must be managed including focussing traffic eastwards through the design of the scheme and ensuring the Rye Hill Road connection is a less attractive through route by designing it such a way that focusses local traffic accessing local services. The SMF should make reference to these measures to ensure they are they are brought forward in a timely manner in the development of the site to address the previously expressed concerns of Harlow Council.

Design Influences

The draft SMF provides a comprehensive appraisal of the key design influences that need to be taken into consideration when bringing forward development on the site.

One of the key determinants that will influence the design of the development will be the movement network, especially how it will be connected to existing communities and facilities in Harlow. In this respect it is important that reference is made to the STC Connector Route

Study. The conclusions of this study will determine route selection and specification for this part of the STC. It is a fundamental prerequisite that developers provide the essential STC connector, running from the northern development boundary to Commons Road, at an early stage of the development. As present the SMF does not effectively reference this requirement. Therefore, the document should only be finalised when the Connector Study is complete, and the routes determined and agreed by the relevant authorities.

Design Drivers and Concept

This section of the document provides a summary of the design drivers that have influenced the evolution of the SMF and how these relate to the overriding aims. Through a series of vignettes key topographical, site features, green infrastructure connections and neighbourhoods are illustrated. Although indicative they do show an East-West Road link from London Road across to Rye Hill Road in Harlow. As mentioned previously the highway solutions that are being proposed though through the SMF need to be referenced and justified to explain how that would address previously stated concerns and how these would be addressed.

The Framework Masterplan

The Framework Masterplan section of the document provides more detail by setting out the key spatial and land use elements of the document.

Although within the area, the SMF does not provide any detail in respect of the Employment Area at Dorrington Farm consequently it is unclear how this will be integrated with the wider site or how the associated traffic movements from this site will be accommodated.

One of the key considerations to ensure how the site will be successfully integrated in spatial planning terms with existing communities and facilities in Harlow, is the proposed connectivity and movement strategy and the associated key principles. This is articulated through three Movement Principles related to walking and cycling, Public Transport and the Sustainable Transport Corridor and Mobility Hubs. In broad terms these are generally supported, especially where they afford additional opportunities for Harlow residents to benefit from new walking and cycling links to the south and to enhanced public transport links via transport hubs and new bus routes.

However, the SMF also provides illustrative material relating to the street hierarchy which shows the East – West Avenue as a Primary Street providing direct vehicular access from the development to Rye Hill Road in the west and to London Road in the east. No detail is provided on where this street will link with London Road although it is assumed this will be determined later. In Harlow Council's recent response to the Further Main Modifications of Epping Forest's Local Plan it was stated that reference should be made to the PJA access study. This study provides detailed guidance on how traffic movements on this connection must be managed, including focussing traffic eastwards through the design of the scheme and ensuring the Rye Hill Road connection is a less attractive through route, by designing it such a way that it focusses on local traffic only accessing local services. As mentioned above, the SMF should be underpinned by material that clearly evidences how this East – West Street mitigates long standing concerns about the impact of additional volumes of traffic impacting on the existing highway network in south Harlow, such as Southern way.

At this stage it is not possible to assess the detailed access assumptions in the SMF without verified traffic modelling and its full consideration of the implications. It is understood that the intention is to use the Harlow Local Development Plan (HLDP) and EFLP modelling, with agreed modal shift assumptions, as a start point, but this is not confirmed.

It would be expected, therefore, that the SMF would seek to further understand likely traffic pressures on Rye Hill Road and future traffic routing via residential streets in southern Harlow. In the absence of this Harlow Council is concerned that there are no measures clearly proposed to address unmanaged access from the development onto Rye Hill Road, and north into Harlow.

With regard to Green and Blue infrastructure, amongst other helpful matters, this section also sets out potential criteria for the selection of Gypsy and Traveller sites within the development and identifies three potential options. Two of these sites are shown located on the west side of the site adjacent to Rye Hill Road and the other, is on the eastern boundary. Given the existing capacity concerns relating to highway capacity in south Harlow the sites adjacent to Rye Hill Road would only exacerbate issues, that would be compounded by large trailers, and would not be supported. The site in the east could however facilitate direct access onto London Road and the wider highway network and subject to more detailed assessment on the impact of adjoining woods and additional screening, may be supported.

Built Form and Place-making

This section sets out general design principles, a density and building heights approach and a framework for legibility and place making across the site that will be supplemented by a subsequent design code. In terms of legibility and place making the focus is on ensuring the primary green and transport corridors have distinct frontages that suggest place as well as creating attractive street scenes. This principle is also continued within the local centre to provide emphasis to the retail and retail frontages. These principles are generally supported.

Sustainability, Phasing and Stewardship

The final element of the document uses the Harlow and Gilston Garden Town Sustainability Guidance and Checklist to assess the key elements set out in the document. This is in the form of a commentary response to issues that are likely to be raised that have been identified through the assessment process. Whilst many of these are helpful in providing further information to expand on the various principles set out in the document, those in respect of sustainable movement require expansion and clarification.

Whilst the commentary acknowledges the overarching HGGT Transport Strategy, it does not provide sufficient commentary to explain how the East – West primary vehicular would work in the context of ensuring it would not be an attractive through route, nor any indication what the expectations are in respect of the delivery of the STC in order to provide a credible alternative to the use of the private car to address road capacity issues, air quality and climate change. Some of the text in the response, whilst noting that the use of the private car is at the bottom of the hierarchy, states that people do not need to use cars for daily business. This must be balanced against the reality that modal shift will not be achieved unless key measures such as the STC are in place.

In addition, in the section on Character Areas the phasing of development on the site is assumed to commence from Rye Hill Road in the west, then progressing east. This remains a concern of Harlow Council and, as mentioned above, needs further explanation and justification coupled with an agreed phasing strategy aligned to the delivery of key elements of the transport strategy and the implementation of appropriate highway solutions.

In conclusion, Harlow Council welcomes ongoing engagement with EFDC and HGGT partners in the preparation of the Masterplans for the Strategic Housing sites around Harlow. The overarching principles set out in the Masterplan framework for the Latton Priory site is generally supported, however, moving forward it is important that the matters and concerns outlined in this response are taken into consideration. This will ensure that a robust and co-ordinated approach is achieved by HGGT partners in bringing forward the Strategic Housing sites.

If you require any further information in relation to this response, please contact in the first instance Paul MacBride, Forward Planning Manager, Strategic Growth and Regeneration
Tel: 01279 446258 Email: Paul.MacBride@Harlow.gov.uk

Yours faithfully,



Tanusha Waters
Assistant Director- Planning and Building Control
e-mail: Tanusha.Waters[@harlow.gov.uk](mailto:Tanusha.Waters@harlow.gov.uk)

Our ref: LPSMF-CON-2023

Your ref:

Date: 9th February 2023

Dear Ms Braddick,

RE: Latton Priory Strategic Masterplan Framework consultation

1. Thank you for consulting Essex County Council (ECC) on the emerging Latton Priory Strategic Masterplan Framework (LPSMF). The Latton Priory site is included in the emerging Epping Forest District Council (EFDC) Local Plan as a major allocation just outside of Harlow, as such, it also forms part of the wider Harlow and Gilston Garden Town which encompass over 20,000 new homes, employment provision and associated infrastructure provisions in and around Harlow.
2. ECC, as one of the five local authorities involved in the Harlow and Gilston Garden Town, has already been engaged in discussions with developers and partners on the proposed development at Latton Priory. Through various meetings and workshops over the last couple of years we have provided our information and our initial views on a variety of county relation issues such as transport and education.
3. ECC, together with Harlow District Council and EFDC, have issued a Strategy Note (see Appendix 1) which set out the three councils' planning strategy for Latton Priory, which covers how one of the key highway infrastructures, the - Sustainable Transport Corridor (STC) connector, should be planned for and delivered.
4. ECC acknowledges that the consultation document covered a wide range of planning issues and sought secure high-quality planning and design for the Latton Priory allocation. The following comments from ECC build upon comments we have made previously, as well as our observations on new materials presented in the consultation document. Our comments have focus on areas that are most relevant to ECC e.g., sustainable transport, highway, and education. In this letter we have also commented on other areas of the document where appropriate.
5. While ECC maintains our in-principle support for this Local Plan allocation and the other strategic allocations across the wider HGGT on a strategic level, we do have significant concerns on the latest proposal as presented in the LPSMF, in

particular, over transportation matters. The broad support for the allocation in the Local Plan was based on achieving a high mode share for sustainable and active transport, with priority given to these modes through investment in infrastructure and services to achieve the modal share. The allocation is also expected to mitigate its impact on the existing community of Harlow.

6. Given our outstanding concerns ECC cannot offer our support to the proposal as presented in the LPSMF consultation document.

Overall quantum of development

7. In terms of the scale of the development being allocated at Latton Priory, which is a minimum of 1,050 homes, ECC have previously expressed concerns on whether the level of allocation at Latton Priory is sufficient to be able to fund the required level of sustainable travel interventions that will be required to mitigate the impact of the development and achieve the 60% modal share target required of a Garden Community site allocation as articulated in the Harlow and Gilston Garden Town (HGGT) Transport Strategy. It should be noted that the HGGT Transport Strategy has been formally adopted by both ECC and endorsed by all the other HGGT partner authorities. We are concerned that the delivery of the Strategic Transport Corridor into Harlow has been omitted which is a fundamental to achieving the 60% modal share required of this site.
8. ECC is aware that the developer has previously submitted representation suggesting the site could accommodate up to 1,500 homes, which is a 50% increase over the Local Plan minimum number of 1,050 homes. In fact, the 1,500 homes number is also referred to in the LPSMF consultation document as one of the indicative development specifications (p68). It is therefore clear that the developer is actively looking to increase housing number on site from 1,050 to 1,500 homes. A 50% increase in the quantum of development is significant and this would have implications for several infrastructure and development mitigation requirements, including education provision, traffic modelling, site layout, density, level of mitigation and contributions etc. ECC would therefore welcome further clarification on the quantum of the proposed development so that we can provide a more accurate assessment on the proposal.

Highway and transport matters

9. ECC welcomes the inclusion of the key masterplanning principles (page 60 of the LPSMF). In particular, the sustainable travel related principles that requires the development to

- *'Provide a strong east-west green corridor providing a walking and cycling corridor across the site'*
- *'Integrate the new neighbourhood into the surroundings and into the surrounding network of streets, cycle routes and PRowS', and*
- *'Provide vehicular access which is designed to be a less attractive or convenient route than the sustainable links.'* (ECC proposes that this principle could be strengthened by adding in the following, *'The design should also aim at reducing potential through traffic movements and provide for sustainable transport connects within the site and beyond.'*)

10. These are key principles and are fundamental to ensure the development will achieve the required level of 60% mode share, and not creating unacceptable level of traffic both on site and in the surrounding road network. One key omission from the section, however, is the need for the developer to deliver the section of the STC which connects their site to the existing Harlow network i.e., provide the sustainable connection from the site into Commons Road. ECC recommend this missing requirement is added to the LPSMF, without which, any proposed development coming forward will receive a strong in principle objection from ECC.

11. Under the Transport section (p156), ECC agrees that detailed transport mitigation package will have to be based on relevant evidence, e.g., a Transport Assessment that will accompany any major planning application. This transport assessment needs to be set in the context of achieving the 60% mode share for active and sustainable modes. We note that reference has been made to the two IDPs, and we this should also include reference to the HGGT Transport Strategy which has been adopted by all HGGT partners and is therefore from both a Planning Authority and Highway Authority an important material consideration in any planning assessment decision.

12. The transport section of the document also listed a number of highway and transportation schemes that are included in the relevant IDPs. For clarity, this is not an exhaustive list, nor is it deemed to be the mitigation package that ECC will agree to when a planning application is submitted. The IDP (Infrastructure Delivery Plan) provides a particularly useful baseline to inform the plan-making process, which means the detailed mitigation measures required of any specific planning applications will be based on the development proposal's requirements

for example in dealing with a significantly larger number of homes. IDPs are produced at a point in time, hence indexation and cost updates/requirement will need to be clarified through the planning application process.

13. The PJA Latton Priory Access Study undertaken for the HGGT Partnership in response to a question by the Local Plan Inspectors, also recommended a range of offsite measures to mitigate the impact of the development on the communities in southern Harlow given there are several schools in the area e.g., traffic management and calming measures, road closures. To the east, the development will impact the M11 motorway/ A414 major road network interchange junction 7 which is at capacity. Improvement will be required at this interchange junction, which will require early engagement with National Highways to determine how this issue can be addressed. To not do so would most probably attract a holding objection from National Highways which is neither quick, nor easy to overcome.
14. The principle of the provision of a strong east-west corridor for walking and cycling is very much welcomed. However, the LPMSF explains the applicant does not have control or access to Riddings Hall Lane nor the track to Dorrington Farm – this will create internal barriers, especially for the North-East and North-West corners of the site for sustainable movement creating indirect circuitous routes between the housing areas, the local centre and bus stops. The developer will need to address this issue and make provision for walking, cycling (or similar) to cross these routes.
15. Finally in relation to transportation, to integrate with the existing community and facilities in southern Harlow the developer needs to make, deliver upgrade existing paths connections into the existing network of streets, footpaths, cycle paths and PROWS.

Phasing of the development

16. Without the submission of a full transport assessment to ECC and the overall mitigation package, it is not possible for ECC to provide relevant comments in detail. We would, however, like to make several observations based on the information provided in the LPSMF.
17. ECC's position has been clear throughout that, to achieve 60% mode share and mitigate traffic impacts from the proposed development, Latton Priory will have to be able to deliver, amongst other things:
 - i. an eastern vehicular access from the outset onto London Road as the primary vehicle access for the site, if not the only access for private vehicles. This would also serve as access for all construction traffic for the entire site; and
 - ii. a Sustainable Transport Corridor (STC) connecting into the existing Harlow road network at Commonsides Road.

18. Evidence previously provided to the Local Plan process, which enabled ECC to support of the principle of development at this site at Latton Priory requires good and effective sustainable transport.
19. In term of the site's primary vehicular access point, the phasing plan in the LPSMP indicates that Rye Hill Road to the west of the site will be used as the primary vehicular access at least for the early phases of the site. The London Road access mentioned above falls under the 'further infrastructure' category and 'will be provided for by certain population size triggers with the goal of early delivery where feasible and reasonable to support the sustainability and cohesion of the new community.' The delivery of a London Road access is a vital element in achieving the 60% mode share target and should be used as the primary access point for the development. As far as ECC is concerned, there is no evidence provided to justify why Rye Hill Road should be considered as the primary access to the site, or to function as such for a prolonged period.
20. ECC would like to make clear that, if the development proceeds ahead of and with any proposed access on to Rye Hill Road, we will insist that from the initiation of the site, that Rye Hill Road should be closed at the point immediately south of the proposed access to the site, so that it will no longer serve as a through route to London Road. The LPSMF (page 172) suggests that a secondary access is provided onto Rye Hill Road. Our view is, that if there is going to be such an access, it will need to be limited so that it does not become an alternative route to the East-West corridor.
21. Our view is that the currently phasing plan is likely to result in significant / unacceptable highway impact on the local network, especially in the residential areas of southern Harlow. Therefore, until such evidence is provided to ECC, as the Local Highway Authority (LHA) we would not be able to support the phasing plan in the LPSMF.

Sustainable Transport Corridor (STC)

22. Another issue to raise is the certainty over the delivery of the Sustainable Transport Corridor (STC). The STC is a critical piece of infrastructure that underpins all strategic growth in and around Harlow. ECC, along with all HGGT (Harlow and Gilston Garden Town) partners, including Epping Forest District Council and Harlow District Council, have issued a joint statement (see Appendix 1) which sets out our clear position on how the STC requirements should be delivered for Latton Priory. In summary, the authorities collective view is:
- The applicant will have to deliver both the onsite STC, and the off-site STC 'connector' road connecting the site and Commonside Road in Harlow.
 - The applicant is responsible for all associate processes including designing the scheme, procurement of any third-party land, seeking planning permission for the scheme, and physically building the scheme.
 - The STC connector should be delivered prior to housing development, or at least at the early stage of the development to maximise its effect on behaviour and modal share.
 - Planning permission will need to be secured for the STC connector prior to, or at the same time as the planning application of the Latton Priory site.
23. These requirements are not currently reflected in the LPSMP. We note that the term STC has been mentioned under various sections of the document, including:
- on p.15 and p.68 it talks about land needing to be safeguarded for the STC;
 - p.55 says the mobility hub should be provided adjacent to the STC;
 - p.156 referred to the cost of the STC and Latton Priory needed to cover 5.01% of the cost. (ECC does not accept this percentage, especially given the developer housing numbers are much higher than the number specified in the Local Plan). and;
 - the phasing plan on p. 154 puts the STC under the category of 'further infrastructure', the same as the London Road access, with no commitment or delivery timescale.
24. The LPSMF gives the impression that while the STC is required, there is no delivery commitment and/or timescale of delivery, and the requirement on the development is only to secure land for the STC within the site, as well as some potential financial contribution. This does not meet the requirements to address modal shift and the requirements of the local authorities who require the development to deliver the STC connection from site to Commonside Road. ECC does not therefore support the LPSMP as drafted until delivery commitment and timescale are made clear in a revised document.

Passenger Transport

25. As part of the HGGT strategic growth this site will need to be served by a high-quality bus rapid transit service and local bus services from the outset. ECC have released information reviewing the operation of buses in Harlow. This includes potential future services that are required to support growth.
<https://www.essexhighways.org/bus-strategy>
26. Essex County Council is currently working on new guidance and will expect these to be taken into consideration through the future planning application process:
- Parking Guidance for Garden Communities, Large Scale Developments, walkable Neighbourhoods
 - Mobility Hubs Guidance
27. The principle of making vehicle access less attractive and convenient than those routes planned for sustainable transport the design of eastern access to London Road will need to make the East-West route less attractive for through traffic, this should include priority turns for public transport only and thereby restricting turning movements for the general traffic at London Road.

Construction Traffic

28. We note that the phasing plan referred to construction traffic and suggests that *'The majority of the construction traffic will access the site from London Road, via the farm track or a haul road (which is connected to London Road)'*. We welcome this commitment in principle as the current road network in the southern Harlow area, passing through residential areas with several primary schools is unable to absorb the level of construction traffic generated by the proposed development. Construction traffic access from the south via Rye Hill Road to London Road will also not be acceptable due to the nature of this route. Details of construction traffic management will be dealt with as part of the planning condition. Physical measures may be required to prevent/enforce the movement of construction traffic.

Education considerations

29. Through previous communications with both the developers and the EFDC, ECC as the Education authority has identified the need for the proposed development to:
- Secure land for a new primary school with early year childcare provision (2.1ha) and a new secondary school (10ha). Land should be set at nominal value as per the ECC Developers' Guide
 - The primary and secondary school sites should adjoin each other to enable an all-through school should that be deemed the most appropriate option
 - Commensurate level of funding for the delivery of the primary school and secondary school are required
30. The site and surrounding area will need to accommodate the design requirements set out in the relevant ECC guidance e.g., the ECC Developer's Guide and the School Organisation Service's document 'Garden Communities and Planning School Places'. The focus should be on providing a traffic free environment around the school as well as promoting active travel. A Land Compliance Study must be submitted alongside any planning application.
31. ECC note that many of these principles have been incorporated into the consultation document and we welcome the inclusion of the school sites at the centre part of the site. Going forward, more detailed discussions will be required to ascertain how education provision will be secured through the planning application and S106 process. This will require further engagement with the wider education team within Essex including Early Years, Special Education Needs (SEN) and Adult education etc.

Employment provision

32. It is important for new large-scale development, such as Latton Priory, to provide sufficient employment provision with the site so that the development is balanced and sustainable. Proximity to employment opportunities is key to encouraging sustainable travel. The emerging EFDC Local Plan acknowledge this need and allocated approximately 1ha of employment as part of the Latton Priory allocation¹, will be supported. It is not clear from the LPSMF, how and when the additional 1ha of employment land will be delivered, when it will be serviced by the developer for use.

¹ Relevant policy wordings in the latest local plan modifications are as follow, 'one hectare of employment land for office/research and development uses (within Use Class E) to be provided at site allocation RUR.E19A in addition to the one hectare of existing employment land within Uses Classes B2 ad B* at Dorrington Farm (site RUR.E19B). The Council recognises that through the detailed masterplanning process it may become apparent that the required employment uses may be better located elsewhere in the masterplan Area to deliver a comprehensively planned development.'

33. Looking at the various map and diagrams, we are concerned that the Dorrington Farm site seems have been excluded from the LPSMF document. ECC understand that Dorrington Farm is occupied by existing employment uses. We note that in the introduction section, CEG (Commercial Estates Group) and Hallam Land are listed as the site promotor and it is not clear whether the owner/developer for Dorrington Farm has been involved in the production of this consultation, it is therefore not clear whether Dorrington Farm could be released for additional employment development.
34. In terms of spatial planning, the LPSMF indicates that Dorrington Farm will be surrounded by future residential developments on all four sides and access to the site will rely on an existing narrow road connecting onto Rye Hill Road. Such design could have potentially negative implication on future employment development at Dorrington Farm and if not addressed early, could restrict the potential employment uses that could be accommodated.
35. Timescale for delivery of the employment allocation is also important. The Indicative Phasing Plan is silent on when and the additional 1 ha of employment provision is expected to be delivered. Late delivery of the employment provision will have implication on the overall sustainability of the site.
36. We note that the revised local plan requirement allows for further consideration to be made, and the masterplanning stage, for employment provision to be realised elsewhere in the masterplan area to deliver a comprehensively planned development e.g. in the neighbourhood centre. Given that the current LPSMF is clear not providing certainty on the delivery of employment provision or even the availability of the Dorrington Farm site, ECC believe it is prudent for the local planning authority and the developer to activate the clause and start looking into alternative approach to delivering the employment allocation.

Climate change and zero carbon

37. The proposals set out by the applicant with regards to energy and sustainability appear to fall short of the aspirations of Harlow and Gilston Garden Town. At a masterplan framework level, it is expected that targets should be agreed which set the ambition of the project to achieve a net zero carbon development. This scheme should therefore be required to achieve Net Zero Carbon from the outset. This site will come forward at a time when the 2025 Future Homes Building Standards will require a step change in building standards driving the net zero agenda forward. It is remiss to not have this high-level aspiration in one of the prime Garden Town sites.

38. The applicants' use of the Harlow and Gilston Garden Town Sustainability Guidance and Checklist is welcomed. However, the responses to the targets set in the checklist are unambitious and do not align with the expectations set out in the 'Garden Town High Quality' column of the checklist. It is noted that the checklist has material planning weight. In accordance with the Checklist, ECC recommends the following targets to be included in the LPSMF:
39. These targets from the checklist include:
- En.1 – operational energy - 35 kWh/m²/yr or less for domestic. It is advised that this should be expanded across all use classes at Latton Priory to include: 65 kWh/m²/yr or less for educational uses and 55 kWh/m²/yr or less for commercial and retail.
- En.2 – embodied carbon (upfront) - <300kgCO₂e/m² for domestic. It is advised that this should be expanded to cover all use classes at Latton Priory to include: <300kgCO₂e/m² for education and retail and <350kgCO₂e/m² for commercial.
- En.3 – space heating demand - 15 kWh/m²/yr for all use classes.
40. Operational energy targets listed above use gross internal floor areas (GIA) and include regulated and unregulated energy loads. EV (Electric Vehicle) charging is not included in the operational energy figure but should be sub-metered. Renewable energy should not be included/deducted within the operational energy calculation. Calculations should be carried out using predictive energy modelling tools, such as Passivhaus Planning package (PHPP), CIBSE (Chartered Institute Building Service Engineers) TM54 or equivalent.
41. In addition, all homes should be fossil fuel free and on-site renewable energy generation should be maximised to at least match the annual residual energy consumption of the development (including regulated and unregulated energy uses but excluding electric vehicle charging).
42. In circumstances where the use of on-site renewables to match total energy consumption is demonstrated to be not technically feasible (e.g., buildings or phases with a smaller roof area than required for energy generation) or economically viable, renewable energy generation should be maximised as far as possible. We would typically expect this to mean at least an electricity generation of 120kwh/m² of building footprint/yr.
43. Post occupancy monitoring should be undertaken on a minimum of 10% of homes and be spread across phases for a period of 5 years to demonstrate the energy performance standards and aid learning, innovation and skills development in the design and construction industry. The post occupancy evaluation should include qualitative (occupant satisfaction questionnaires) and quantitative data (energy monitoring to review against targets set). Where targets

are not met in occupation, explanation should be provided and learning and improvements taken forward to the next phase of development.

44. Including these principles will provide assurance that Latton Priory will aim to be a truly net zero development, contribute to the wider objectives of the energy system, and help enable the UK (United Kingdom) to meet its legally binding net zero targets.
45. Put simply, to achieve net zero in operation, buildings need to improve fabric efficiency as much as possible; use a low carbon heat source such as a heat pump; and maximise renewables on-site. To help deliver and measure net zero development, space heating and energy use intensity targets should be met, and net zero operational energy balance on-site demonstrated.
46. Studies have shown that it is technically feasible for most residential typologies to achieve net zero carbon in terms of both operational regulated and unregulated energy (by targeting high fabric standards driven by space heating and energy use intensity targets) and achieving on-site energy balance by generating enough renewable energy to meet residual energy demand. The cost uplift has been shown to be lower than often anticipated too. For example, a cost uplift of 2-4% was shown in the evidence prepared for Cornwall Council.
47. The Net Zero Carbon Viability and Toolkit Study (2022) produced by the Three Dragons demonstrates that it is viable in most areas of Essex to build new homes to Passivhaus levels of fabric efficiency. The study also recommends that key performance indicators (KPIs) are achieved. These KPIs align with the LETI approach for net zero carbon and those broadly set out in the EFDC and HGGT checklists for energy use intensity and space heating demand, with renewables maximised on site.

<https://www.essexdesignguide.co.uk/climate-change/net-zero-evidence/net-zero-carbon-viability-and-toolkit-study/>

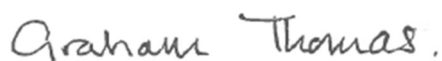
48. Latton Priory appears to be in the second highest value area for viability (value area 3). For which Passivhaus levels of fabric efficiency is viable. It is worth noting the Chelmsford Garden Community has adopted a similar approach to Net Zero carbon with progressive targets staggered across the different development phases over time.
49. Attractive, climate resilient homes with high levels of comfort and wellbeing, and incredibly low energy costs – which will undoubtedly be attractive to market. The Home Builders Federation, in a [recent survey](#) of around 2,000 people (reported Q1 2022), found that 73% are worried about energy performance of their current home and that around a quarter say that energy efficiency will be crucial to their next home move.

50. Unfortunately, this masterplan framework as it stands does not address the climate emergency, it instead appears to represent a development seeking to meet and at best marginally exceed minimum compliance for operational energy and embodied carbon. This development relies heavily on dealing with sustainability and energy at reserved matter stage. This simply delays the setting of appropriate targets and does not give designers and developers certainty for design decisions.
51. Further detailed sustainability and energy comments are included in Appendix 2

Developer contributions

52. The HGGT IDP included a number of infrastructure requirements, but the IDP list should not be seen as exclusive and detailed S106 requirements, especially those related to ECC service areas, will need to be discussed on a case-by-case basis and in accordance with the latest guidance i.e., the latest ECC Developers' Guide to Infrastructure Contribution for details on what contributions ECC would seek for each service area. We expect details around the full S106 requirements to be discussed and confirmed through pre-application discussions.
53. As alluded to above, further clarification is needed in terms of the scale of the development before ECC can provide further comments on the S106 package that we believe is required from the development proposal. Early pre-application discussions with ECC on all relevant matters concerning the Latton Priory development is therefore essential.

Yours sincerely



Graham Thomas
Head of Planning & Sustainable Development

Enquiries to: Tai Tsui, Principal Planning Officer (New Settlements)
Telephone: 07913369135
Email: tai.tsui@essex.gov.uk

Appendix 1 Latton Priory Planning Strategy Note

Attached separately

Appendix 2 Detailed sustainability and energy comments

Page 139 - Orientation and form

Whilst it is acknowledged that a balance should be struck between orientation for solar gain and good urban design, the applicant should commit to investigating how urban design can be used to improve solar access. Commitment should therefore be made to ensure this is demonstrated to an appropriate level of detail at outline application stage.

A commitment should be made to calculate disclose and seek to reduce form factors at outline planning and reserved matters stages.

Page 139 - Follow energy hierarchy

The strategic masterplan lacks detail and ambition in following the energy hierarchy to ultimately achieve the net zero carbon target. The proposal to meet Future Homes Standard represents minimum standards.

The building regulations approach to 'net zero' is has been acknowledged by the UK Committee on Climate Change (CCC) as falling short. The CCC recommends a limit of 15-20 kWh/m²/yr for space heating demand for all buildings by 2025 at the latest. For a development to be 'net zero carbon' in its operation, then it needs to address both regulated and unregulated energy and so is wider in scope than Building Regulations alone - the FHS (Future Homes Standard) and FBS will not achieve net zero in their proposed form. It is therefore imperative that Latton Priory is designed to a net zero carbon standard that reflects the high-quality targets set out in the Harlow and Gilston Garden Town Sustainability Guidance and Checklist.

Page 140 – Fabric first approach

Targets for the building fabric should be required at Masterplan stage. While it is recognised that the precise building method and materials may be unknown, a space heating demand target of 15 kWh/m²/yr should be set and committed to. This would align with the high-quality column of the Harlow and Gilston Garden Town Sustainability Guidance and Checklist. This would also ensure that the building is

The [Net Zero Carbon Viability and Toolkit Study](#) demonstrates the importance of an energy efficient building fabric and how much the space heating demand can be reduced because of it. Resulting in the space heating demand being one third of the size of a building regulations compliant home, reducing residents' energy bills significantly.

Page 140 – Ventilation and overheating

As with fabric first, a lack of detailed design at this stage does not preclude the setting of targets and KPIs. The use of a space heating demand target as noted above will ensure efficient retention of heat in winter when ventilating. A commitment should be made to meet the requirements of building regulations Part O as a

minimum. The use of appropriately sized windows and orientations together with the use of external shading would not be onerous overheating mitigation measures for applications later down the line.

Page 140 – Embodied and operational energy

As stated by the Harlow and Gilston Garden Town Sustainability Guidance and Checklist, developments should be aiming for net zero carbon. No commitment has been made to achieve this through the masterplan framework.

The targets set in En.1 (operational energy $<35\text{kWh/m}^2/\text{yr}$), En.2 (embodied carbon $<300\text{kgCO}_2\text{e/m}^2$), and En.3 (space heating demand $15\text{ kWh/m}^2/\text{yr}$) should be committed to by the applicant. These targets allow appropriate flexibility for detailed design at this stage.

Page 140 – Renewable technologies

A commitment should be made to design roofs of homes to maximise the area available for PV. The masterplan should also seek to balance the amount of energy generated by PV against the energy consumed by the home in a year.

It is expected that the development will be fossil fuel free and seek to use technologies such as air source heat pumps.

Page 141 – Air-tight strategy and thermal bridge free

Agreed that air tightness and thermal bridging is a matter of detail to be addressed at reserved matters stage. However, a commitment should be made to a space heating demand target of $15\text{ kWh/m}^2/\text{yr}$ and operational energy target of $<35\text{kWh/m}^2/\text{yr}$. These targets will ensure good airtightness and thermal bridging at reserved matters stage.

Page 142 Energy efficiency and carbon reduction

The Masterplan Framework acknowledges the Harlow and Gilston Garden Town Sustainability Checklist but fails to commit to any of the targets listed.

The descriptive narrative for design measures to reduce operational energy consumption is welcomed, however, this should be supported with a commitment to the operational energy ($<35\text{kWh/m}^2/\text{yr}$) and space heating demand ($15\text{ kWh/m}^2/\text{yr}$) targets to meet net zero carbon by 2030.

No mention has been made of design measures to reduce embodied carbon; this should include working with the structural engineer to reduce material volumes as well as a consideration of material choice. The embodied carbon target ($<300\text{kgCO}_2\text{e/m}^2$) should be set for this site.

Page 143 – Renewable energy

A commitment should be made for the proposals set out. The development should commit to being fossil fuel free, use LZC technologies such as heat pumps and balance remaining energy consumption of the home with renewable energy.

A commitment should be made to design roofs to maximise the area available for PV. The amount of PV proposed should match the electricity consumption of the home.

Page 147 – Water management

The proposal to meet the water efficiency standard of 110l/p/d is supported.

Page 151 - Assuring performance

A commitment should be made at this stage to carry out post-occupancy evaluation on 10% of homes for a minimum of 5 years post-competition. The post-occupancy evaluation should cover the quality areas listed in the Masterplan Framework (RIBA Post Occupancy Evaluation of build quality, functionality and impact).



Epping Forest Heritage Trust

January 23rd 2023

To: CEG; Hallam Land Management; Epping Forest District Council; Harlow
& Gilston Garden Town

Concerns about the proposals for Latton Priory.

Epping Forest Heritage Trust

Epping Forest Heritage Trust is a membership organisation and charity dedicated to preserving and protecting Epping Forest, its flora, fauna, culture and heritage for people to enjoy now, and for generations to come. Our 1,000 plus members largely live in the various communities throughout the Epping Forest area. We have been engaged with and committed to the Forest for over 60 years and are a member of the Epping Forest Consultative Group run by the City of London Corporation.

Epping Forest is a hugely important ancient Forest, much of which is both a Site of Special Scientific Interest and a Special Area of Conservation, with iron age camps, 1,000 year-old trees and rare wood pasture habitat and species. It now faces the gravest threats that it has seen since it was first protected by the 1878 Epping Forest Act. Climate change, increasing levels of pollution and the acceleration of nearby developments have led to a reduction in the biodiversity of the Forest (flora and fauna). Neighbouring development, including plans to build 68,000 housing units in its vicinity, already threaten its resilience to pollution. Anticipated increased visitor numbers and budget cuts mean conservation, habitat improvement and maintenance are curtailed, and biodiversity is reduced.

At the same time the Forest has the potential to help us tackle the crucial issues of our time: it helps us tackle climate change by reducing temperatures and capturing carbon; it provides a vital amenity for people's health and wellbeing as a space to walk, cycle, ride, relax and enjoy. It is therefore essential that we protect and preserve the Forest not just for our own current enjoyment, but also for generations to come, and for the sake of the planet.





That is why we have the following concerns in relation to the proposed Latton Priory Development:

We are deeply concerned that the proposals will lead to more traffic through, to, from and around the Forest, causing more pollution and damage to its flora and fauna.

The proposed development is within the 6.2 kilometre "Zone of Influence" and so increased visitor numbers are presumed.

The development, we believe, has:

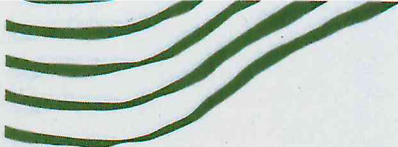
- **inadequate sustainable transport provision**, meaning that residents are more likely to use their cars to travel to, through, from and around the Forest using their cars, rather than using sustainable transport modes such as bikes or public transport. As currently planned we believe significant new car journeys will be generated towards and through Epping Forest.

We believe there needs to be much improved sustainable transport provision, including firm commitments, for example, to buses, including their planned timetables, so that **detailed transport and journey mapping can be undertaken to demonstrate that there will be no adverse impact on the Forest and the Special Area of Conservation.**

- **inadequate Suitable Alternative Natural Green Space (SANG).** Epping Forest is a significant attraction to visitors as an amazing ancient forest full of history and culture. Any genuine SANG has to be of high enough quality to deter people from making the journey to Epping Forest. We do not believe that the current plans meet this standard, and they will therefore not provide an alternative destination for people's leisure time and activities. We believe there needs to be more provision for recreational walking and cycling in the proposed SANG, with longer cycle trails and more off-road recreational cycle facilities, such as tracks for BMX and mountain biking.

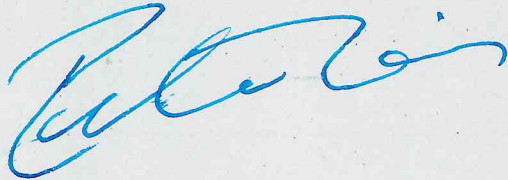
As currently planned we do not think the SANG will offer a genuine alternative to people visiting Epping Forest, and we therefore think there will be significantly increased visitor numbers, with the related increases in traffic, pollution and footfall in the Forest.





We believe the above issues are significant and need to be addressed before this proposal proceeds any further.

Yours faithfully



Peter Lewis
Chief Executive



Latton Priory SMF Consultation

CEG Sloane Square House
1 Holbein Place
London
SW1 8NS

The Coach House, East Hill House,
76 High Street, Colchester, Essex, CO1 1UF
01206 835150 www.lpppartnership.co.uk
Co. Reg. No. 5677777

aarti@lpppartnership.co.uk

Via email only: lattonpriory@ceg.co.uk

13th January 2023

Dear Sir/ Madam

**Latton Priory Draft Strategic Masterplan Framework Consultation 2022 –
Representations on behalf of Princess Alexandra Hospital Trust (PAH)**

1. We write on behalf of our client, Princess Alexandra Hospital Trust (PAH), in response to the above consultation on the Latton Priory Draft Strategic Masterplan Framework (SMF), which we understand will be used as guidance to inform a future planning application(s) for the proposed development including up to 1,500 dwellings.
2. In particular, we request amendments to the SMF to more accurately reflect the requirements for healthcare infrastructure and/ or funding to mitigate the impacts arising from the proposed development.
3. Please note that we have also liaised with the Hertfordshire and West Essex Integrated Care Board (HWE ICB) with regard to previous engagement with the applicant and Epping Forest District Council and the implications of the proposed development on other healthcare sectors. This response, therefore, represents one part of an overall ICB response that will also cover other healthcare considerations.

Background

4. PAH has submitted an evidence base to inform preparation of the Harlow and Gilston Garden Town Infrastructure Delivery Plan (IDP), which includes the Latton Priory strategic housing allocation. The details provided by PAH have now been included in the draft IDP, which is awaiting finalisation. This letter should, therefore, be read in conjunction with the draft IDP, which identifies the following floorspace and/ or funding to mitigate the impacts arising from the proposed development (based on a development of 1,050 dwellings):
 - ❖ Secondary healthcare (PAH) - £1,996,060;
 - ❖ Primary healthcare - Direct delivery of OR (subject to agreement) contribution in lieu - £699,318.

Managing Director:
John Lawson, BA(Hons), MPhil, MRTPI

Directors:
Sharon Lawson, BA(Hons), DipTP, MRTPI
Georgina Brotherton, BSc(Hons), MSc, MRTPI

Technical Director:
Aarti O’Leary, BSc(Hons), MA(Merit), MRTPI

Associate Director:
Natalie Makepeace, BA(Hons), MSc(Dist), MRTPI

Consultant:
James Lawson, BA(Hons), MA, MRTPI

- ❖ Community and Mental Health and Well-Being Services - On-site provision to be considered as part of new local health hubs OR contribution in lieu - £286,287.
- ❖ Community Diagnostics Hub(s) - Floorspace and/or Contributions to be considered at Masterplan/ Application stage.

Comments on Draft Strategic Masterplan Framework

Planning Policy and Planning Obligation Tests

5. It is noted that the SMF states that future planning applications will include *“the securing of and timing of delivery of mitigation measures and/ or infrastructure which is in compliance with the infrastructure tests set out in Section 122(2) of the Community Infrastructure Levy (CIL) regulations”*.
6. We wish to highlight that healthcare, including acute hospital service provision, is a recognised community infrastructure item that could be the subject of S106 and CIL funding, where appropriate – as referred to in general at NPPF paragraph 34, and more specifically in the adopted and emerging Epping Forest Local Plans (adopted policies CP1 and I1A, and emerging policies D1 and D2).
7. Planning obligations including S106 contributions must only be sought where they meet all of the statutory tests set out in the CIL Regulation 122¹ and as policy tests at paragraph 57 of the NPPF:
 - ❖ They must be necessary to make the development acceptable in planning terms;
 - ❖ Directly related to the development; and,
 - ❖ Fairly and reasonably related in scale and kind to the development.
8. With the above in mind, PAH took the following approach in its submitted evidence base to the IDP on healthcare infrastructure requirements arising from the proposed Latton Priory development:
 - ❖ Step 1² – identified the full-service demand associated with the proposed new development using appropriate evidence – to avoid double-counting, it is necessary to identify the level of new growth directly related to the development, over and above demographic growth which is funded by the treasury and other funding streams;
 - ❖ Step 2 – assessed existing service capacity & ability, if any, to absorb the identified new level of demand; where existing capacity/ funding is available to be drawn down against the needs of the development, a developer contribution will not be justified; and,
 - ❖ Step 3 – Confirmed there is no available capacity to absorb the new demand. Consequently, a service capacity gap has been identified, along with appropriate mitigation needed to make the development acceptable in planning terms. Sometimes the level of demand will necessitate an

¹ The Community Infrastructure Levy Regulations 2010, as amended by the 2011 and 2019 Regulations

² Note - exercise undertaken by PAH excludes general A&E attendances which the HUDU model cannot currently model but is to be used as the basis to go forward in respect of acute healthcare contributions. Mental health inpatient admissions, and community care provision are also excluded, which also needs to be factored in, details of which will be provided by the ICB.

extension to an existing facility and in others a new separate facility will be justified. There may be solutions other than new floorspace that can be used to meet additional demand through improved efficiency and associated activity rates. Such solutions would need to be funded through a financial contribution. In addition, certain acute outpatient facilities may be provided within Health Centres including any proposed as part of the Latton Priory development.

9. The above assessment demonstrates that mitigation of the impacts arising on acute healthcare services and facilities would be necessary. Also given that a shortfall in acute healthcare funding is likely, the approach would be consistent with the planning obligation tests and, therefore, should be included in the infrastructure items to be secured through a S106 Agreement linked to any grant of planning permission for the proposed development.

Capacity of Existing Healthcare Facilities

10. In order that the SMF appropriately addresses the need to meet the 'CIL tests' in relation to mitigating infrastructure and/ or funding, the discussion on surrounding facilities at page 26 should include recognition that the capacity of identified healthcare facilities to accommodate the needs arising from the proposed development will need to be taken into account and mitigation provided, as necessary.

Socio-Economic Checklist

11. We note that the response to question Se.3 refers to discussions between Epping Forest District Council and local healthcare providers, which indicated that a health centre within the Latton Priory development would not be required. However, it is concerning that the response does not include alternative proposals to mitigate the healthcare impacts arising from the development in lieu of floorspace provision. As mentioned above, there may be solutions to meet additional demand through improved efficiency and associated activity rates.
12. In light of this, it is considered that further details of proposed mitigation measures are required to demonstrate that the proposals would address all aspects of the Socio-Economic Checklist. This could include the secondary healthcare financial contribution outlined in the draft IDP, which would need to be adjusted to reflect the increased scale of development proposed at Latton Priory. For ease of reference, we have scaled up the contribution below:

- ❖ Secondary healthcare (PAH):
 - £1,996,060 for 1,050 dwellings - £1,901.00 per dwelling (rounded to nearest £);
 - £2,851,514 for up to 1,500 dwellings.

Indicative Phasing Strategy

13. The proposed phasing of the development on page 154 of the SMF is noted. It is considered that mitigation of healthcare impacts could be similarly phased to ensure it is provided at appropriate stages of the development and its occupation. This could be secured via appropriate clauses within a S106 Agreement linked to the grant of any planning permission for the proposed development.

Details of Further Stakeholder Workshops

14. It is noted that the SMF refers to stakeholder workshops that took place in June and July 2022, at which health centre provision was discussed. However, it is concerning that no details of the healthcare mitigation related discussions are included in the following paragraphs as they have been for other items of supporting infrastructure. As such, it is considered that this section of the SMF should be amended for completeness.

Conclusion

15. PAH welcomes the opportunity to engage in the preparation of the Latton Priory Strategic Masterplan Framework and supports the recognition that the proposed development would need to appropriately mitigate impacts on healthcare services and facilities. However, it is considered that the draft document should be amended to reflect the various options for mitigating healthcare impacts, if it is concluded at the time a planning application is submitted for the development that provision of healthcare floorspace would not be the most appropriate means of meeting the additional demand generated.
16. Securing healthcare infrastructure and/ or funding has been demonstrated to be compliant with the CIL Regulations, being necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind to the development. Therefore, the SMF should make reference to securing healthcare infrastructure and/ or funding to ensure that sustainable development can be achieved in respect of the Latton Priory proposals, in accordance with the adopted and emerging Local Plan.
17. It is, therefore, requested that the proposed amendments are made to the SMF prior to its endorsement by Epping Forest District Council.
18. We would be grateful if you could confirm safe receipt of this response.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Aarti O'Leary', written in a cursive style.

Aarti O'Leary
Lawson Planning Partnership Ltd



Replies please to :
12 Bury Road
CM165EU
01992560191
lowryepp@gmail.com

??? January 2023

Latton Priory Planning draft Strategic Masterplan Framework (SMF), by CEG / Hallam

Dear Sirs

The relevant committee of the Epping Society has considered the draft SMF, and wants to express a number of reservations. These are listed in an attachment, with general comments first and page-referenced points later.

We want to emphasize that from our point of view the chief concern is the impact the proposed development will have on areas to the South within the locality, in particular traffic congestion, pollution and pressure on local infrastructure such as roads, parking, the tube network and Epping Forest.

We feel these issues have not been even acknowledged, far less assessed or mitigated in the draft SMF – casting into doubt the term “strategic”.

These concerns are shared by other groups including North Weald Parish Council, EFDC, and many local residents.

The Epping Society would seek to have these matters resolved before the planning of this development proceeds further.

We would be prepared to take part in further discussions on this plan, to resolve our reservations.

Faithfully

Mr R. K. Lowry
Vice Chair, the Epping Society



**The Leisure Centre
Bumbles Green
Nazeing
Essex EN9 2SF**

Telephone: 01992 893012

Email address: council@nazeingparishcouncil.org

Latton Priory SMF Consultation
CEG Sloane Square House
1 Holbein Place
London SW1W 8NS

30th December 2022

Sent by email to: lattonpriory@ceg.co.uk

Dear Sirs

Re: Latton Priory Planning Consultation

At their meeting on 8th December 2022, Nazeing Parish Council's Planning Committee considered the consultation information, in relation to the above, forwarded by Epping Forest District Council.

It was Resolved to comment that if in excess of 1000 new homes are provided at the above site this will assist EFDC to fulfil its obligations with regard to Government requirements.

The proposal should also mean that less homes are required in Nazeing. Further, in a development of this size it will be easier to provide the necessary infrastructure and facilities than on a small development.

Please include these comments in your Consultation responses.

Yours faithfully,

Katie Fletcher

Katie Fletcher
Assistant Clerk to Nazeing Parish Council



**The Leisure Centre
Bumbles Green
Nazeing
Essex EN9 2SF**

Telephone: 01992 893012

Email address: council@nazeingparishcouncil.org

Latton Priory SMF Consultation
CEG Sloane Square House
1 Holbein Place
London SW1W 8NS

30th December 2022

Sent by email to: lattonpriory@ceg.co.uk

Dear Sirs

Re: Latton Priory Planning Consultation

At their meeting on 8th December 2022, Nazeing Parish Council's Planning Committee considered the consultation information, in relation to the above, forwarded by Epping Forest District Council.

It was Resolved to comment that if in excess of 1000 new homes are provided at the above site this will assist EFDC to fulfil its obligations with regard to Government requirements.

The proposal should also mean that less homes are required in Nazeing. Further, in a development of this size it will be easier to provide the necessary infrastructure and facilities than on a small development.

Please include these comments in your Consultation responses.

Yours faithfully,

Katie Fletcher

Katie Fletcher
Assistant Clerk to Nazeing Parish Council



North Weald Bassett PARISH COUNCIL

Thornwood Common Parish Hall, Weald Hall Lane, Thornwood, Essex CM16 6NB

Tel: 07572 507591

Email: clerk@northweald-pc.gov.uk

www.northweald-pc.gov.uk

Clerk to the Council.

Susan De Luca

CEG Hallam Land Management

Sent via Email to: lattonpriory@ceg.co.uk

10th January 2023

FAO: Latton Priory Consultation Team

RESPONSE TO LATTON PRIORY DRAFT STRATEGIC MASTERPLAN FRAMEWORK CONSULTATION

Please accept this letter as the formal response from North Weald Bassett Parish Council to the Latton Priory Draft Strategic Masterplan Framework consultation which runs from 17th December 2022 through to 23rd January 2023.

The response deals with some very specific matters concerning the Strategic Masterplan Framework as well as some more general and generic matters relevant to the residents in the Parish of North Weald Bassett. They are grouped under specific headings, and in some cases pose specific questions to which the Parish Council would like a response.

The site-specific points concerning the proposed development are addressed later in this response, however to begin the Parish Council would like to set out the following.

EFDC started the process of creating its Local Plan in 2010, evolving over time to identify the preferred growth strategy for the future of the Epping Forest District. As the plan progressed, part of this growth included a joint venture between EFDC, Harlow Council and East Hertfordshire District Council to create the Harlow and Gilston Garden Town (HGGT), of which Latton Priory forms part. Much work has been completed by these parties to establish the appropriate quantum of development at HGGT to ensure it is both sustainable and does not place an unacceptable level of pressure on the Highways Network. This has involved spending millions of pounds on consultants, reports, analysis, assessments, opinions, consultations, documents, meetings, etc, each acting as a piece of evidence to support the trajectory for the way forward. However, the Parish Council is astonished at the lack of a common-sense approach being applied to future development at this site, and a reliance instead on targets, figures and statistics being used as a way to provide evidence of the suitability of the development. It should be clear to all parties that you cannot have one without the other, especially when trying to design a development holistically. This lack of common sense is particularly evident in the following elements of the Strategic Masterplan Framework proposals:

HEALTHCARE: Page 152 of the consultation document states that discussion with EFDC and Local Health Providers confirms there is no requirement for a health facility, i.e. a doctors will not be provided. In 2021, the average per household was 2.36 people, and assuming this figure against the proposed number of homes means the development at Latton Priory would house 3,540 people. How can it be feasible that a development of this size does not provide adequate healthcare facilities? Where is the evidence that the health needs of these individuals will be catered for, where would that be, and has it been confirmed they have capacity given the current crisis with the NHS? Whilst it is understood that the only obligation on the developer is to provide a building for a health facility (which I am sure they

would provide), it is ludicrous that the local health bodies / health service providers consider there is no need to provide a doctors service to serve this development. The Parish Council could not support a development where the health of its future residents has not been fully considered

AIR QUALITY: Page 150 of the consultation document states that an Air Quality Assessment (AQA) has not yet been carried out, being subject to modelling against the developments traffic flows which are also not yet calculated. An AQA is designed to ensure that present and future occupants are not exposed to unacceptable levels of air pollution. How can it be acceptable that a Masterplan is being proposed for a development of 1,500 homes when insufficient assessments have been conducted to establish that this would not be detrimental to people's health. In addition, how can it be acceptable that development traffic flows have also not yet been calculated. Page 150 goes on to state that the AQA will accompany any outline planning application, however the Parish Council argues this is too late in the process and the assessment needs to be completed prior to the Strategic Masterplan Framework being agreed. After all, how can you deem a development site acceptable if you haven't done the work first to prove this is the case. This makes no sense.

B1393 ACCESS ROAD: Page 78 of the consultation document states that the route of the East-West Avenue from the edge of the development towards London Road has yet to be fully determined. How can a development of 1,500 be principally agreed when the main access road location hasn't. Once again, this makes no sense.

PROXIMITY TO THORNWOOD AND EPPING: It is evident that there is a deliberate focus on Latton Priory only being connected to Harlow Town, and a failure to adequately consider the reality of the attractiveness for commuters to travel into London via the London Underground, going through the hamlet of Thornwood and the impact this will have. Whilst it is accepted that the site forms part of the Harlow and Gilston Garden Town, the difference in cost to travel to London via the Underground compared with the Overground Rail Network is significant, and highly attractive to future residents. As presently submitted, this does not seem to be recognised, and there are no formal plans for a bus service to be provided to Epping (other than an acceptance that a bus strategy will be needed), nor any detail as to what sustainable transport methods will be promoted and encouraged towards both Thornwood and Epping to avoid car use. Page 48 references a 'Potential extension to the Sustainable Transport Corridor' but in reality what does this mean? When will it happen? The word 'Potential' is useless without the supporting evidence to back it up. Without more thought and consideration about travel patterns towards Epping, you cannot comfortably say that the current congestion at The Plain junction, Epping would not be exacerbated, causing further misery for local residents who use the B1393.

POLICY: Within the Submission Version of the Local Plan is a very clear demarcation line of the Latton Priory Masterplan area. The current consultation proposes 1,500 new homes for the Latton Priory site, however the site being proposed is greater than that in the local plan – containing an extra three parcels. Page 21 of the consultation states that these additional 'areas beyond the site allocation to the south' are 'included as they are necessary for the delivery of the site'. What exactly does this mean? For example, is it 'necessary' to ensure that 1,500 homes can be delivered, and if so does this mean that if the housing numbers were reduced to those originally proposed in the Submission Version of the Local Plan (approximately 1,050) would these additional areas beyond the site no longer be necessary? This has not been fully explained.

RYE HILL ROAD: Rye Hill Road is a well known rat run between Epping / Thornwood and Harlow, avoiding the need to navigate the J7 M11 roundabout, especially during rush hour. The junction of Rye Hill Road and the London Road / B1393 is a notorious hot spot for accidents and near misses. Page 157 of the Masterplan confirms that the HGGT Latton Priory Access Strategy Assessment report July 2020 identifies a number of suggested mitigation options, one of which includes works to downgrade Rye Hill Road to the south of the site to prevent its use by through traffic potentially through the use of modal filters. However the documentation goes on to state that 'These mitigation options will be considered in detail as part of the Transport Assessment prepared in support of the planning application'. Firstly, surely the right thing to do is complete a full and detailed Transport Assessment *before* you try and allocate a site for the development of 1,500 new homes. Secondly, the movement and access details of and around a new development site should be agreed before the allocation?

SUSTAINABLE TRANSPORT TO AREAS OTHER THAN HARLOW: Whilst already briefly mentioned under an earlier heading, there isn't anything within the consultation documentation that truly considers the sustainable transport options to any areas outside of Harlow. In fact this is supported on page 70 where it states that the 'Mode share objective is that 50% of all trips starting and / or ending in the existing settlement area of Harlow Town should be by active and sustainable travel modes and 60% of all trips starting and / or ending in the new Garden Communities of HGGT should be by active and sustainable travel modes.' Where does this leave the neighbouring communities specifically Thornwood and Hastingwood? There seems to be a reliance that residents in these locations can walk or cycle to the site using the current PRow network, however there is no suggestion that this current network will be upgraded in any way to support this principle of movement. Indeed, if walking or cycling from Hastingwood to Latton Priory you would be risking life and limb on the J7 M11 roundabout. The 'potential extension' to the Sustainable Transport Corridor can be discounted as it has no supporting evidence, nor any information as to exactly what this would consist of and when it could come on-line. How are children from Thornwood, Hastingwood and North Weald Bassett expected to sustainably (and safely) travel to Latton Priory for school?

CUMULATIVE IMPACT ON DEVELOPMENT: Whilst it is accepted that this current consultation is for one site – the Latton Priory Site – there are other large scale proposed development sites both around Harlow and in neighbouring villages, namely Thornwood and North Weald Bassett. Despite requesting further information from numerous sources, the Parish Council is yet to see any evidence of joint working with other developers, specifically in terms of the cumulative impact of traffic on the Highway Network. It is understood that Essex County Council is the authority responsible for assessing such matters, however how can the Parish Council and local residents be confident that all this development will not cause long term issues from residents if the evidence is not available?

BROADBAND – The word 'Broadband' is mentioned only twice within this 201-page consultation document (on page 156) within one paragraph, which states 'The instillation of broadband technology will be vital to the success of Latton Priory, particularly with more and more people working from home. Fibre to the Property (FTTP) should be delivered to ensure that all domestic and commercial uses are served, thus ensuring that business within the site can operate efficiently, working from home is enabled (also helping to ensure that the residents of Latton Priory have the opportunity for a work - life balance) and to ensure that smart homes can be enabled to support multiple devices within the home. It also helps with the reduction in the need to travel, thus helping to achieve modal transport shift'. Given how vital good, reliable, fast, effective broadband is to the everyday lives of all of us, one paragraph is insufficient to instil confidence as to how and when this will provided. Superfast, reliable internet access is as fundamental to the functionality of today's society as any other element needed to make a development acceptable. This matter is made worse by the response to Se.8 on page 153 of the consultation document under the Socio-Economic Checklist which states that 'It is *assumed* that high quality digital communications technology will be provided at Latton Priory to facilitate 21st century working requirements. However, this is not something that the masterplan can address in detail at this stage.' You cannot commit to providing a high quality, sustainable functional development of 1,500 new homes on an assumption. Without this, people cannot work from home, businesses cannot operate efficiently, and the modal shift cannot be achieved. The Parish Council would like to see further information about what service is to be provided, when it will be installed, how and where it will be available across the entire site (not just FTTP), and what functions it will support.

The Parish Council feels that without further work on all the above aspects, each of which is needed to ascertain if the site is indeed suitable for development, the strategic masterplan framework cannot and should not be accepted. Further work is needed to consider the suitability of the site, and how it will operate on a fundamental operational level.

SPECIFIC MATTERS

Location of Allotments – The current proposed location of the new allotments is to the south west of the site. The National Society of Allotment and Leisure Gardeners has created a publication entitled '21st Century Allotments in New Developments: A Practical, design-led and policy-based guidance for planners and developers'. Within this document it states that allotments designed into the outer spatial periphery of a new development can be vulnerable targets for intruders, vandalism and crime. This can affect social

inclusion, as vulnerable users can be deterred from taking up plots and existing plot holders can be driven to quit. The Parish Council asks that full consideration is given to the design suggestions within the leaflet, and the location of the allotments reconsidered alongside this evidence.

Cycling Route Rye Hill Road – Page 29 of the document suggests that sections of Rye Hill Road are part of an existing walking and cycling network, however the Parish Council suggests that almost the entire length of Rye Hill Road is unsuitable to safely cycle or walk, and there is no formal cycling route as suggested. You can cycle on every road, but not every road is a cycle route.

Thornwood – As previously mentioned there is a clear failure in the Masterplan to adequately recognise the site's relationship to the hamlet of Thornwood, and what this means in terms of the impact of development on residents of Thornwood, specifically concerning traffic and transport.

Ridge Line / Build to Line – Page 49 of the consultation document, under Place-making and Design, states that one of the guidance points from the HGGT Design Guide is that development should be set back from the ridgeline, and that the roofline of new homes should not go above the level of the horizon. However, it is then stated that 'Given that the lowest point of the site is 95m AOD and the high point is 110m AOD, this 15m rise would only enable development on the lower parts of the site (and not beyond 100m AOD), something that the site cannot achieve if it is to deliver 1,050 new homes'. This statement is unclear, and seems to contradict other statements within the documentation which confirms that all built form should remain to the north of the Build-to line. This needs to be clarified.

Building Heights – Also on page 49 it states under Place-making and Design that one of the guidance points from the HGGT Design Guide is that buildings should be 2 storeys in height to maintain the natural horizon, however further wording suggests that the site promoters feel this is too restrictive to achieve the number of homes required along with the densities and modal shift. There needs to be a clear understanding as to what takes priority – good design or housing numbers.

Car Parking – Whilst the aspirations in terms of modal shift should be commended, one must question the reality as to how feasible this is given the location of the Latton Priory Development site. Without doubt the Sustainable Transport Corridor into Harlow will help, however we are not a London or Birmingham where public transport is frequent and regular and a truly viable alternative to the car, and we will never be. This is primarily because of the surrounding rural location and proximity to the Highway network. Page 54 addresses the future trend and influences of mobility, but seems at odds with itself. In one sentence it accepts that the car will continue to have its place 'in the short term', yet in another it accepts that vehicle electrification and the use of electric vehicles is a sustainable mode of transport. It goes on to state people are making fewer car trips and there is a behavioural shift away from car orientated trips. However, whilst Latton Priory is on the outskirts of Harlow, the site is still bounded by an extremely rural environment where reliance on a motor vehicle is essential to conduct day to day activities, and the reliance on a car remains as necessary now as it was 30 years ago. It's great to plan for improved sustainable developments, but the Masterplan as currently proposed is unrealistic in terms of its expectation for reduced car use which will lead to problems with parking and associated antisocial behaviour going forward.

Education – Page 57 makes reference to the schools in Latton Priory being easily accessible to their surrounding neighbourhoods through sustainable means of transport ensuring that children and young people remain active and get regular exercise, and that a key aim of Latton Priory should be to create car free environments around schools as much as possible and little or no drop off parking provision, reflecting current national trends. Whilst this is great for residents of the Latton Priory development itself, the school is set to serve pupils from other local areas, including Thornwood, Hastingwood and North Weald. The document does not address how these children can access the school via sustainable transport methods, specifically cycle and walking, meaning the likelihood is they will need to be driven and then dropped off in a remote location away from the school. Is this considered acceptable?

Compliance with the HGGT Objective and Strategies – Page 70 states that the Latton Priory Masterplan will support, *where possible*, the overall Garden Town Objectives. Firstly, it should be clarified when / if there would ever be a situation where it would be acceptable for the HGGT objectives to NOT

be supported. Secondly it should also be clarified if this statement relates to the Strategic Masterplan Framework as being consulted upon, or if there is another Latton Priory Masterplan we should expect.

Cycle Parking – Page 74 suggests that for houses without garages, suitable facilities within each dwelling, such as garden sheds, will be provided for storage of cycles. No member of this Parish Council can confirm a developer who has provided garden sheds to the purchaser of a new property. In addition, this would mean that for many properties, people would have to walk their cycles through their houses to gain access the garden shed at the back. This makes no sense and is entirely unrealistic.

Bus Strategy – Page 138 references that a detailed bus strategy will be prepared to encourage the use of public transport, focussing on key destinations such as Harlow Town Centre, Harlow Town rail station and Epping Underground station. This is the only time within the document that it is recognised that a sustainable transport link to Epping is needed. However, surely this should be completed before acceptance of the site for development, with a plan in place and the bus service operating at first occupation to ensure bad behaviour doesn't set in and the modal shift targets have a chance of being achieved.

Gypsy and Traveller Community – There are three proposed locations for the allocation of the Gypsy and Traveller Community. Page 93 of the consultation documentation specifies the criteria for site selection, which includes 'Separation from existing G&T site to the north' and 'Some degree of separation from settled communities to provide acoustic and visual privacy'. All three potential site locations are directly adjacent to the settled community parts of the development. Whilst this Council cannot offer an alternative potentially suitable location, consideration must be given to the impact on the settled community.

Sustainable Transport Corridor / Phasing – The success of a modal shift relies on patterns of poor travel behaviour not becoming embedded within a community. There is no clear date stated for when the Sustainable Transport Corridor (STC) upon which the entire modal shift is reliant, is scheduled to be built and become operational. The site at which this STC is located is identified as being in Phase 2 of the development, albeit not specifically mentioned. Page 154 identifies Phase 1 as including the build of around 500 homes. Further clarification is needed as to exactly when the STC should be in place and operational to stop poor travel behaviour setting in. This matter is further exacerbated by documents included with EFDCs Local Plan Evidence Base document ED144A.1 which contains an email from the site promoter / developer stating that the developer 'presumes that the STC is not required to be delivered prior to the occupation of development and equally, the Programme does not provide for submission and/or approval of details of the STC between Latton Priory and Harlow Town Centre (or part thereof) prior to the granting of consent for the Latton Priory allocation or its subsequent implementation according to a phased development programme.' This is obviously extremely concerning, and will allow the embedding of unsustainable travel patterns.

Heritage – Page 43 of the consultation documentation recognises that the site has the potential to include Roman remains, including a suspected Roman road that crosses the site north-south. The Parish Council is pleased to see that further archaeological research will be undertaken, and expects that any historic roman remains are catalogued, persevered and undamaged by any future development. The Parish Council would like to see evidence of this.

Police / Fire / Services – There are no details within the consultation documentation regarding how the safety and security of residents in the development will be catered for. There is no evidence of conversations with the Police, Fire and Rescue Services, nor a Safer Communities team. Such details should be duly considered before the development is agreed.

Building Design – One element of the proposals which this Council supports is the more traditional, rural design of properties on the southern border of the development facing Rye Hill Road. The Rural Edge suggested densities of 20-30 dph, being of more traditional design with front gardens, two storey in height, and detached or semi-detached provides a visual buffer between the more traditional properties on Rye Hill Road, B1393 and Thornwood and those of Harlow.

Conclusion

Many of the ideas and strategies for the HGGT development and the Strategic Masterplan Framework are laudable and deserve recognition in terms of what they are trying to achieve, however it is apparent that for any matters that do not fit with the plans for HGGT, the approach is to simply put your head in the sand and ignore it. Many of the issues contained in the early part of this response are unrecognised, not acknowledged or simply washed over. There is a failure to adequately consider this development as being related to anywhere other than Harlow, despite its location to Thornwood and Epping, and the fact that it is part of North Weald Bassett Parish within the Epping Forest District. The changes in terminology makes it confusing for residents to read alongside the policies contained within the local plan (e.g Strategic Masterplan Framework, Illustrative Masterplan Framework, Masterplan, the Framework Masterplan) and it is unclear exactly what part of the masterplan process this sits. Until all these matters, specifically the first 9 headings in this response, are adequately addressed, the Parish Councils position is that the Strategic Masterplan Framework as submitted does not provide sufficient detail for the Council to be satisfied that the site can come forward as a well-designed, sustainable development that will NOT negatively affect the Highway network in the surrounding areas causing a detriment to our residents. All these matters need to be addressed and resolved.

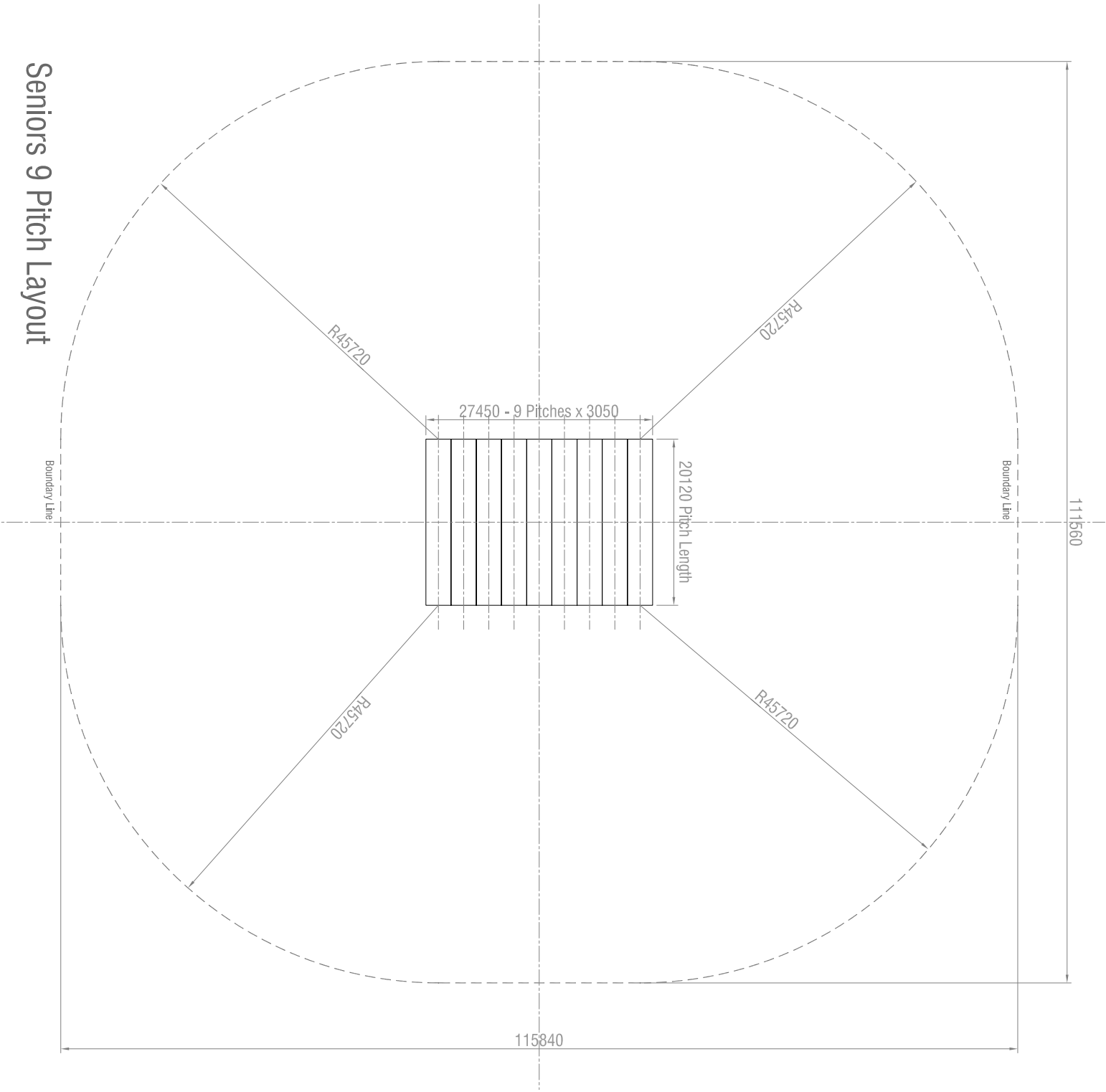
Yours sincerely

[email copy]

Cllr Alan Buckley
Chairman

cc. North Weald Bassett Parish Councillors
Cllr Chris Whitbread
Cllr Holly Whitbread
Cllr Les Burrows
Cllr Jaymey McIvor
Cllr Richard Morgan

Seniors 9 Pitch Layout



Dear Sir/Madam

Latton Priory Strategic Masterplan Framework Draft (November 2022)

Thank you for consulting Sport England on the above masterplan consultation. Sport England is a Non-Departmental Public Body and the Government's strategic lead for community sport. We provide advice and support to local planning authorities and other bodies preparing development plans and planning policy documents on community sport and physical activity related matters. We are also a statutory consultee on planning applications affecting playing fields and therefore we engage in the planning policy process to complement this role.

I would make the following comments on the strategic masterplan framework:

Community Sports Facility Provision

The proposals for the Latton Priory masterplan include up to 1,500 dwellings, a secondary and primary school, a mixed use local centre and a range of green infrastructure. In accordance with the NPPF, Sport England seeks to ensure that the development meets any additional community sports facility needs that are generated by the development. In this context, I would wish to make the following comments on the community sports provision aspects of the masterplan:

Outdoor Sports Provision

The emerging masterplan makes provision for 3.06 ha of sports pitch provision in part of the proposed 'Rye Hill Park' to the south west of the development. The scale of the area proposed has been informed by the use of Sport England's Playing Pitch Calculator which is consistent with the advice in Epping Forest District Council's Playing Pitch Strategy. While it is unclear what estimated population size has been used to derive the 4.82 pitches referred to on page 84 of the document, this amount of pitches would appear to be broadly appropriate for supporting a population generated by 1,500 dwellings. It would be helpful if the finalised masterplan could advise what estimated population is being used so that the figures can be checked. Providing a 3.06 ha site to accommodate up to 5 pitches could be acceptable in principle depending on what types of pitches are to be accommodated and the space that is actually available for pitches in practice. The Green Infrastructure, Recreation and Play Strategy plan on page 84 provides an illustrative layout of the sports pitches site at Rye Hill Park. While this is very indicative at this stage, I would make the following comments due to the potential implications for the masterplan and a subsequent outline planning application:

- An indicative layout (to scale) of the sports pitches should be prepared to support a future outline planning application to demonstrate the minimum area that could be made available for sports pitch use and to show that a range of sports pitches that would be responsive to the demand generated by the development could be accommodated on the area available; As a rule of thumb Sport England and the sports governing bodies advise new sports grounds in major developments to be designed so that they can accommodate at least two senior football pitches and a 9 pitch cricket square and associated outfield (the football pitches would be located outside of the square in the outfield area). In practice, the senior football pitches may be marked out for youth or mini football pitches instead but by providing the flexibility to accommodate two senior football pitches ensures that a site can accommodate the two largest football pitches if required. Sport England's Comparative Sizes (Outdoor) guidance <https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/outdoor-surfaces> provides details of sports pitch

dimensions and run-off areas and the attached diagram provides an indicative layout of a cricket square and outfield area for clarity;

- New greenway routes should run around the perimeter of the sports ground rather than through the centre of it. As well as compromising sports pitch layouts, the introduction of footpaths/cycle routes through the centre of a playing field increases the risk of ball strike especially from cricket squares;
- The sports ground will need to be supported by a pavilion to provide essential ancillary facilities such as changing rooms, toilets, refreshment, social and storage facilities. It would also need car and cycle parking and associated vehicular access to support use by away teams and officials who will not reside in the local area. As the indicative plan does not show these facilities it is unclear whether the masterplan has accounted for the need for these facilities and whether the 3.06 ha proposed would be with or without the supporting facilities. The area of sports pitch provision proposed to meet the needs of the development should exclude the space required for a pavilion, parking and access as this cannot be used for accommodating pitches. The indicative plan referred to above should show the potential siting of a pavilion, parking and access as this will help demonstrate whether the sports ground could accommodate all of the required facilities;
- The amenity grass proposed to the west of the sports pitches should be designed so that it could be used in the future for additional sports pitches as well as informal recreation (as the principal use) if required by the community. This would help future proof the site and would be appropriate given the close proximity between the two spaces e.g. mini football pitches could be marked out on this space on a seasonal basis without compromising the informal function of the space. However, the space would need to be sufficiently level and free of footpaths, trees and other constraints to facilitate potential sports pitch use;
- The boundary between Rye Hill Park and the proposed secondary school to the east should be designed to facilitate pedestrian access between the two sites in order to support shared use as it may be desirable for the school to access the community pitches during the week and the community to access the school pitches at weekends without compromising security.

The proposed phasing of the development set out on page 154 of the document which proposes that Rye Hill Park will be provided in the first phase of the development is welcomed as this would help ensure that the needs of the residents in the earlier phases of the development could be met on site and would reduce the pressure on existing facilities in the local area which may already be operating at capacity.

In addition to sports pitches, the development will need to make provision for the additional demand it will generate for other types of outdoor sports facilities such as tennis and netball courts. The LTA encourage the provision of tennis courts in public parks so therefore the scope for this in the key parks such as Latton Park or Rye Hill Park where formal and informal sport would be appropriate should be explored. An alternative for tennis and netball provision would be dual use of a multi-use games area (MUGA) provided on the secondary school site. However, as a MUGA provided on a school site would only be designed for educational use (in accordance with DfE guidance) it would not be floodlit and potentially not fenced so therefore there would be a need to secure an uplift to the design of a MUGA facility on the school site to meet community needs.

While the proposed sports ground at Rye Hill Park would cater for the majority of the pitch sport demand generated by the development, there would be a need to make provision for pitch sports that could not be accommodated at Rye Hill Park such as rugby union and hockey where off-site provision towards improving capacity at existing sites (e.g. Harlow Rugby Club) would be more appropriate. Financial contributions would therefore need to be

secured towards such provision. The development would also generate demand for additional 3G artificial grass pitch (AGP) provision. While such provision would not appear to be appropriate at Rye Hill Park, a shared facility at the proposed secondary school should be explored. A 3G AGP could also meet some of the demand for natural turf football pitches if the Rye Hill Park site cannot accommodate the full range of football pitches. An indicative layout (to scale) of the secondary school site would be helpful to show whether there was scope to accommodate a 3G AGP as well as the school's other outdoor sports needs.

Indoor Sports Provision

No specific reference appears to be made in the masterplan to how the additional indoor sports facility generated by the development could be met although reference is made in the 'Stewardship' section to a potential leisure centre on the secondary school site. The Epping Forest District Council Built Facility Strategy identified that the strategic allocations within EFDC's area around Harlow would collectively generate a demand for the equivalent for one 3 court sports hall and 2 lanes of a swimming pool. Planned growth within Harlow Council's boundaries will generate further demand and existing community facilities in the area such as Harlow Leisurezone are identified as operating at capacity. A strategic solution is therefore needed for the Harlow Garden Town area to address the additional demand for the principal indoor sports facilities which is beyond the scope of this masterplan. However, there is scope for the development to provide a solution or part of the solution through a shared use facility such as a leisure centre on the secondary school site especially as the school will need its own indoor facilities such as a sports hall and activity/fitness studios. Consideration should therefore be given to how the secondary school could meet the additional demand generated by this development and how this could be delivered. Any facilities provided on the school site would need to be designed for community use in accordance with Sport England's design guidance rather for educational use in response to DfE guidance. For example, a community four court sports hall has different dimensions to a school sports hall and has different ancillary facility requirements. Sport England's established Sports Facilities Calculator (SFC) <https://www.sportengland.org/facilities-and-planning/planning-for-sport/planning-tools-and-guidance/> can help to provide an indication of the likely demand that will be generated by a development for certain facility types. The SFC indicates that a population of 3,600 (based on 1,500 dwellings with a typical occupancy of 2.4 persons per dwelling) in Epping Forest district will generate a demand for 0.25 sports halls (£716,341), 0.18 swimming pools (£786,542) and 0.06 rinks of an indoor bowls centres (£25,499). The attached WORD document provides more detail of the calculations.

In addition to conventional dedicated sports facilities, some indoor facility needs can be met in part through multi-purpose community facilities such as community halls, school halls, places of worship and pavilions. Sport England's Village and Community Halls design guidance <https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/sports-halls> may be helpful in this regard. Consideration should therefore be given to whether any community facilities proposed within the development should be designed so that they can provide for formal sports use as well as other community uses.

The approach towards indoor sports facility provision will therefore need to be considered before an outline planning application is submitted. Sport England would object to a future planning application if there were no clear proposals for meeting the additional needs that would be generated.

Active Design

Sport England, in conjunction with the former Public Health England (now OHID), has produced 'Active Design' <https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design>, a guide to planning new developments

that create the right environment to help people get more active. The guidance sets out ten key principles for ensuring new developments incorporate opportunities for people to take part in sport and physical activity. The Active Design principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design which is consistent with section 8 of the NPPF. Sport England commends the use of the guidance in the master planning process for new residential developments. It should also be noted that the current version of the Essex Design Guide (February 2018) <https://www.essexdesignguide.co.uk/> has embedded the Active Design principles into guide.

In this context, the specific reference on page 86 of the document to the Active Design principles being a key component in establishing the masterplan is welcomed. The proposals in the masterplan such as the priority given to creating active travel links within the development and connecting to existing networks outside the development, the mobility hub, the range of multi-functional open space and the co-location of community facilities exemplify that that Active Design principles have been considered at the masterplan level.

The Active Design guidance includes a checklist that can be applied to developments and it is recommended that the checklist is used in the preparation of an outline planning application for the individual phases to ensure that opportunities for encouraging active lifestyles have been fully explored as the proposals progress. This checklist should also be used as part of the preparation of a Health Impact Assessment. Sport England would welcome discussions with the applicant in due course to provide further advice on how Active Design can be considered in the emerging proposals.

I hope that this response is helpful. Sport England would be happy to discuss the emerging masterplan framework with the developer and the local planning authorities and the comments set out above with a view to addressing the comments that have been made. A discussion in advance of an outline planning application being submitted would be particularly helpful.

Please contact me if you have any queries.

Yours faithfully

Roy Warren
Planning Manager

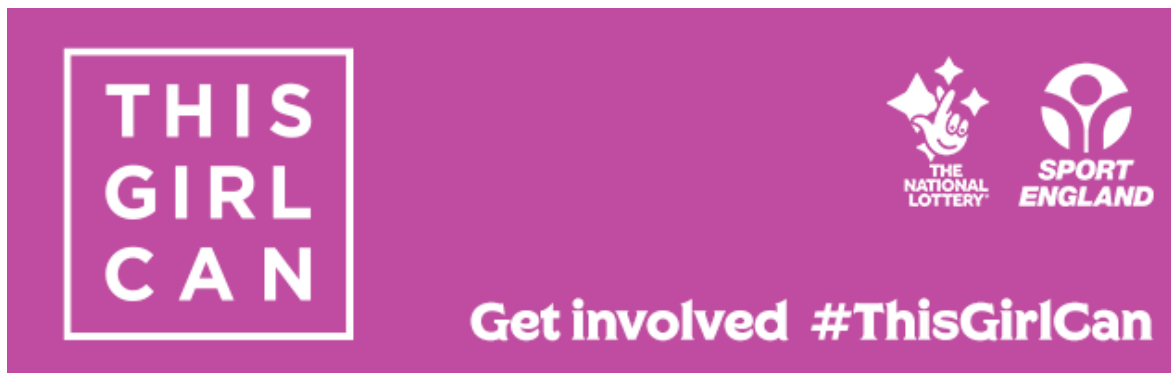
M: 07769 741137

F: 01509 233 192

E: Roy.Warren@sportengland.org



WINNER



We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [Gaile Walters](mailto:Gaile.Walters)

The information contained in this e-mail may be subject to public disclosure under the Freedom of Information Act 2000. Additionally, this email and any attachment are confidential and intended solely for the use of the individual to whom they are addressed. If you are not the intended recipient, be advised that you have received this email and any attachment in error, and that any use, dissemination, forwarding, printing, or copying, is strictly prohibited. If you voluntarily provide personal data by email, Sport England will handle the data in accordance with its Privacy Statement. Sport England's Privacy Statement may be found here <https://www.sportengland.org/privacy-statement/> If you have any queries about Sport England's handling of personal data you can contact Gaile Walters, Sport England's Data Protection Officer directly by emailing DPO@sportengland.org



CEG

By email:

lattonpriory@ceg.co.uk



Chris Colloff

Email: chris.colloff@thameswater.co.uk
Mobile: 07747 647021



Thames Water Ltd
1st Floor West
Clearwater Court
Vastern Road
Reading
RG1 8DB



thameswater.co.uk

Our Ref:

17 January 2023

Latton Priory Strategic Masterplan Framework Consultation

Dear Sir/Madam,

Thank you for consulting Thames Water on the above document. Thames Water are the statutory sewerage undertaker for the area and as such have the following comments to make on the masterplan framework document.

Wastewater Infrastructure

Page 39 of the document provides guidance on flood risk and storm drainage issues. It is stated that storm water drainage will be able to discharge to the watercourses and would not be reliant on connection to Anglian Water storm sewer assets. It is then highlighted that Anglian Water are the incumbent foul water company for the area with several foul water mains to the west and north of the site. The site lies within the area served by Thames Water and as such the masterplan should be updated to reflect this.

In response to consultation on the submission version of the Epping Forest Local Plan it was highlighted that the wastewater network capacity in the area of Latton Priory is unlikely to be able to support the demand anticipated from the development and that strategic drainage infrastructure is likely to be required to ensure sufficient capacity which will need to be brought forward ahead of the development. These comments were on the basis of the draft allocation for 1,050 homes together with employment development and it is noted that the consultation masterplan framework document refers to up to 1,500 homes including a local centre. The timescales for delivering infrastructure should not be underestimated with local upgrades taking 18 months to 3 years to plan and deliver. Strategic upgrades can take up to 5 years to deliver.

As set out in the emerging Local Plan, there should be early engagement with Thames Water to discuss the infrastructure requirements for the development and ensure that development is aligned with the delivery of any necessary infrastructure upgrades. Further information on pre-planning enquiries can be found at: <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity>

I trust that the above comments will be given due consideration. Should you have any queries regarding the comments please do not hesitate to contact me.

Your sincerely,

Chris Colloff MRTPI
Planner

Page 1 of 1

Latton Priory SMF Consultation
CEG Sloane Square House
1 Holbein Place
London
SW1W 8NS

20th January 2023

Dear Project Team,

Reference: Latton Priory Strategic Masterplan Framework Consultation

As the UK's leading woodland conservation charity, the Woodland Trust aims to protect native woods, trees and their wildlife for the future. We own over 1,000 sites across the UK, covering over 30,000 hectares and we have over 500,000 members and supporters. We are an evidence-led organisation, using existing policy and our conservation and planning expertise to assess the impacts of development on ancient woodland and ancient and veteran trees. Planning responses submitted by the Trust are based on a review of the information provided within the consultation documents.

Potential deterioration of Ancient Woodland

The Trust **holds concerns** about the proposed Latton Priory development on the basis of potential deterioration and detrimental impact to the adjacent Mark Bushes/Latton Park (grid ref: TL4680707510), a Plantation on Ancient Woodland Site designated on Natural England's Ancient Woodland Inventory (AWI). Our main concerns relate to:

- Significant intensification of human activity and recreational disturbance.
- Fragmentation of the ancient woodland from adjacent semi-natural habitats.
- Noise, light and dust pollution.
- Threats to long-term retention of trees from increased safety concerns.
- Adverse hydrological impacts.
- Potential introduction of invasive non-native species to the woodland.
- Potential for increased boundary issues.
- Cumulative effect of the above impacts resulting in long-term deterioration.

Ancient Woodland

Natural England and the Forestry Commission, the Government's respective bodies for the natural environment and protecting, expanding and promoting the sustainable management of woodlands, define ancient woodland as follows within their standing advice¹:

"Ancient woodland takes hundreds of years to establish and is defined as an irreplaceable habitat. It is a valuable natural asset important for: wildlife (which include rare and threatened species); soils; carbon capture and storage; contributing to the seed bank and genetic diversity; recreation, health and wellbeing; cultural, historical and landscape value. It has been wooded continuously since at least 1600AD. It includes:

¹ <https://www.gov.uk/guidance/ancient-woodland-ancient-trees-and-veteran-trees-advice-for-making-planning-decisions>

The Woodland Trust is a charity registered in England and Wales (No. 294344) and in Scotland (No. SC038885).

A non-profit making company limited by guarantee. Registered in England No. 1982873.

The Woodland Trust logo is a registered trademark. FSC® Certified Paper.

- *Ancient semi-natural woodland [ASNW] mainly made up of trees and shrubs native to the site, usually arising from natural regeneration.*
- *Plantations on ancient woodland sites – [PAWS] replanted with conifer or broadleaved trees that retain ancient woodland features, such as undisturbed soil, ground flora and fungi”*

Both ASNW and PAWS woodland are given equal protection in government’s National Planning Policy Framework (NPPF) regardless of the woodland’s perceived condition, its size, or features it contains.

Planning Policy

The National Planning Policy Framework, paragraph 180, states: *“When determining planning applications, local planning authorities should apply the following principles:*

c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons⁶³ and a suitable compensation strategy exists;”

Footnote 63, defines exceptional reasons as follows: *“For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat.”*

Impacts to Ancient Woodland

The large-scale nature of the Latton Priory Garden Town proposal has the potential to result in significant adverse impacts on ancient woodland. Natural England and Forestry Commission have identified impacts of development on ancient woodland within their standing advice (please see the annex at the foot of this document for the full range of impacts outlined). This guidance should be considered Government’s position with regards to development impacting ancient woodland, although Natural England and Forestry Commission should still be consulted for specific comment on this proposal.

We are specifically concerned about the following impacts to the ancient woodland:

- Intensification of the recreational activity of humans and their pets can result in disturbance to breeding birds, vegetation damage, trampling, litter, and fire damage.
- Fragmentation as a result of the separation of adjacent semi-natural habitats, such as small wooded areas, hedgerows, individual trees and wetland habitats.
- Noise, light and dust pollution occurring from adjacent development, during both construction and operational phases.
- Where the wood edge overhangs public areas, trees can become safety issues and be indiscriminately lopped/felled, resulting in a reduction of the woodland canopy and threatening the long-term retention of such trees.
- Adverse hydrological impacts can occur where the introduction of hard-standing areas and water run-offs affect the quality and quantity of surface and ground water. This can result in the introduction of harmful pollutants/contaminants into the woodland.
- Development can provide a source of non-native and/or invasive plant species and aids their colonisation of the woodland.
- Where gardens abut woodland or the site is readily accessible to nearby housing, it can result in boundary issues between landowners, such as adjacent landowners

extending garden areas into the woodland or dumping garden waste into the woodland. It can also create pressure to fell boundary trees because of shade and leaf fall and interference with TV reception. Boundary trees are also put into tree safety inspection zones resulting in costs for neighbours and increasingly comprehensive felling.

When land use is intensified such as in this situation, woodland plant and animal populations are exposed to environmental impacts from the outside of a woodland. In particular, the habitats become more vulnerable to the outside influences, or edge effects, that result from the adjacent land's change of use. These can impact cumulatively on ancient woodland - this is much more damaging than individual effects.

Mitigation

Detrimental edge effects have been shown to penetrate woodland causing changes in ancient woodland characteristics that extend up to three times the canopy height in from the forest edges. As such, it is necessary for mitigation to be considered to alleviate such impacts. Natural England and Forestry Commission have also produced guidance on mitigation measures to alleviate impacts to ancient woods and trees within their standing advice (please see the annex at the foot of the document).

Additional mitigation approaches are also outlined in our Planners' Manual²; these measures would help ensure that the development meets policy requirement and guidance and include:

- Non-invasive root investigation for ancient trees and protection beyond the limit of the usual investigative tools.
- Retaining and enhancing natural habitats around ancient woodland to improve connectivity with the surrounding landscape.
- Measures to control noise, dust and other forms of water and airborne pollution.
- Woodland restoration – such as in PAWS.
- Sympathetic design and use of appropriate lighting to avoid light pollution.
- Producing and funding an access management plan for the woodland, and/or providing alternative natural greenspace to reduce additional visitor pressure.
- Introduction of sympathetic management for neglected woodlands or trees.
- Implementation of an appropriate monitoring plan to ensure that proposed measures are effective over the long term and accompanied by contingencies should any conservation objectives not be met.

Buffering

Buffering ancient woodland can be an ideal mitigation measure as buffer zones can be used to establish distance between the development and habitat, which helps to alleviate harmful impacts, while also creating new areas of habitat around the ancient woodland. This development should allow for a buffer zone of **at least 50 metres** to prevent adverse impacts such as pollution and disturbance and ensure avoidance of root damage.

This is backed up by Natural England and Forestry Commission's standing advice which states that *"the proposal should have a buffer zone of at least 15 metres from the boundary of the woodland to avoid root damage (known as the root protection area). Where assessment shows other impacts are likely to extend beyond this distance, the proposal is likely to need a larger buffer zone. For example, the effect of air pollution from development that results in a*

² <https://www.woodlandtrust.org.uk/media/51656/planners-manual-for-ancient-woodland.pdf>

significant increase in traffic.” Further information on buffer zones is outlined in the annex below.

Ancient and Veteran Trees

It is important that an arboricultural impact assessment is undertaken early within the design process, to ensure that ancient and veteran trees are identified and accounted for as the scheme progresses. This will ensure that appropriate protection can be incorporated into the scheme design. We would also recommend that a review of the Trust’s Ancient Tree Inventory³ is undertaken to identify any ancient, veteran and notable trees within the proposal boundary which may pose a constraint to the scheme.

It is essential that no ancient or veteran trees are lost as part of the development. The loss of any such trees can have a significant impact on local wildlife, particularly those which depend on the habitat provided by veteran trees. Any loss of veteran trees can also be highly deleterious where there is a wider population of veteran trees within close proximity, which may harbour rare and important species.

Trees are susceptible to change caused by construction/development activity. As outlined in ‘BS5837:2012 - *Trees in relation to design, demolition and construction*’ (the British Standard for ensuring development works in harmony with trees), construction work often exerts pressures on existing trees, as do changes in their immediate environment following construction. Root systems, stems and canopies, all need allowance for future movement and growth, and should be taken into account in all proposed works on the scheme through the incorporation of the measures outlined in the British Standard.

While BS5837 guidelines state that trees should have a root protection area (RPA) of 12 times the stem diameter (capped at 15m), this guidance does recognise that veteran trees need particular care to ensure adequate space is allowed for their long-term retention. It is imperative that Natural England and Forestry Commission’s standing advice on root protection areas for veteran trees is taken into account in planning decisions. This advice states:

*“For ancient or veteran trees (including those on the woodland boundary), the **buffer zone should be at least 15 times larger than the diameter of the tree.** The buffer zone should be **5 metres from the edge of the tree’s canopy if that area is larger than 15 times the tree’s diameter.** This will create a minimum root protection area. Where assessment shows other impacts are likely to extend beyond this distance, the proposal is likely to need a larger buffer zone.”*

Conclusion

Ancient woodland is an irreplaceable habitat, once lost it is gone forever. Any development resulting in loss or deterioration of ancient woods and trees must consider all possible measures to ensure avoidance of adverse impact.

As this proposal progresses, the scheme developers should seek to ensure that ancient woods and veteran trees will be appropriately protected from the impacts associated with large-scale residential/mixed-use development. Where appropriate mitigation is not achievable then the scheme should not be taken forward in its current form.

³ [Ancient Tree Inventory - Woodland Trust](#)

If you would like clarification of any of the points raised, please contact us via campaigning@woodlandtrust.org.uk

Yours faithfully,

Nicole Moses
Campaigner – Woods Under Threat
Woods Under Threat Team

Annex:

**Natural England and Forestry Commission's standing advice:
Ancient woodland, ancient trees and veteran trees: advice for making planning decisions**

Direct and indirect effects of development:

Development, including construction and operational activities can affect ancient woodland, ancient and veteran trees, and the wildlife they support on the site or nearby.

Direct effects of development can cause the loss or deterioration of ancient woodland or ancient and veteran trees by:

- *damaging or destroying all or part of them (including their soils, ground flora or fungi)*
- *damaging roots and understorey (all the vegetation under the taller trees)*
- *damaging or compacting soil*
- *damaging functional habitat connections, such as open habitats between the trees in wood pasture and parkland*
- *increasing levels of air and light pollution, noise and vibration*
- *changing the water table or drainage*
- *damaging archaeological features or heritage assets*
- *changing the woodland ecosystem by removing the woodland edge or thinning trees - causing greater wind damage and soil loss*

Indirect effects of development can also cause the loss or deterioration of ancient woodland, ancient and veteran trees by:

- *breaking up or destroying working connections between woodlands, or ancient trees or veteran trees - affecting protected species, such as bats or wood-decay insects*
- *reducing the amount of semi-natural habitats next to ancient woodland that provide important dispersal and feeding habitat for woodland species*
- *reducing the resilience of the woodland or trees and making them more vulnerable to change*
- *increasing the amount of dust, light, water, air and soil pollution*
- *increasing disturbance to wildlife, such as noise from additional people and traffic*
- *increasing damage to habitat, for example trampling of plants and erosion of soil by people accessing the woodland or tree root protection areas*
- *increasing damaging activities like fly-tipping and the impact of domestic pets*
- *increasing the risk of damage to people and property by falling branches or trees requiring tree management that could cause habitat deterioration*
- *changing the landscape character of the area*

Mitigation measures

Mitigation measures will depend on the type of development. They could include:

- *putting up screening barriers to protect ancient woodland or ancient and veteran trees from dust and pollution*
- *measures to reduce noise or light*
- *designing open space to protect ancient or veteran trees*
- *rerouting footpaths and managing vegetation to deflect trampling pressure away from sensitive locations*
- *creating buffer zones*

Use of buffer zones

Buffer zones can protect ancient woodland and individual ancient and veteran trees and provide valuable habitat for woodland wildlife, such as feeding bats and birds. The size and type of buffer zone should vary depending on the:

- *scale and type of development and its effect on ancient woodland, ancient and veteran trees*
- *character of the surrounding area*

For example, larger buffer zones are more likely to be needed if the surrounding area is:

- *less densely wooded*
- *close to residential areas*
- *steeply sloped*

Buffer zone recommendations

Where possible, a buffer zone should:

- *contribute to wider ecological networks*
- *be part of the green infrastructure of the area*

A buffer zone should consist of semi-natural habitats such as:

- *woodland*
- *a mix of scrub, grassland, heathland and wetland*

The proposal should include creating or establishing habitat with local and appropriate native species in the buffer zone.

You should consider if access is appropriate. You can allow access to buffer zones if the habitat is not harmed by trampling.

You should not approve development proposals, including gardens, within a buffer zone.

You should only approve sustainable drainage schemes if:

- *they do not affect root protection areas*
- *any change to the water table does not negatively affect ancient woodland or ancient and veteran trees*

This page is intentionally left blank