

APPENDIX 1



BOROUGH of BROXBOURNE LOCAL PLAN - REG 18 CONSULTATION

COMMENTS SUBMITTED ON-LINE on 16th September 2016

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Section 3 Growth Levels and Locations

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The Conservators of Epping Forest are currently engaged in discussions with the four SHMA authorities of Uttlesford, East Herts, Harlow and Epping Forest District and Natural England so as to reach a Memorandum of Understanding (MoU) as regards the possible impact of proposed increased housing (and its associated traffic) on Epping Forest Special Area of Conservation (SAC). Currently air pollution is adversely affecting Epping Forest with Critical Loads of Nitrogen exceeded across the whole Forest and Critical Levels of oxides of Nitrogen gases exceeded across a significant proportion of Forest Land. These exceedances affect the health and resilience of trees and impact on the balance of vegetation and fungal communities. This is likely to be having a significantly adverse impact on the SAC and future development needs to avoid further significant adverse impacts, both alone and in combination, as set down in the Habitats Regulations 2010.

Broxbourne is adjacent to the four-authorities' SHMA area, sharing its boundary with Epping Forest District and the increase in housing density within the Borough may have 'in combination' impacts along with the increases being proposed in the four-authorities' SHMA. The proposed spatial options for the distribution of growth across Broxbourne, therefore, may need to be subject to an assessment of air quality impacts to determine whether any of those options are likely to have an unacceptable impact on the Epping Forest SAC.

It would seem likely to The Conservators of Epping Forest that traffic modelling would be required to determine these impacts and this is covered in more detail in the Conservators' response at section 10.6 on road connectivity in relation to Park Plaza in particular. However, the large increase in housing in general across the Borough may also have knock-on impacts. Joint working with the London Borough of Enfield and the four-authorities SHMA group seems essential to ensure that knock-on impacts on Epping Forest SAC are fully examined and to ensure avoidance or mitigation measures can be considered. The officers of The Conservators, with advice from Natural England, would be happy to be involved in any discussions on the preparation of evidence ahead of the Regulation 19 submission of the Broxbourne Local Plan.

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10. Park Plaza

10.6 Road Connectivity

The Conservators of Epping Forest would wish to raise concerns about the impact of the proposed Park Plaza developments, particularly those involving currently protected Green Belt land, on Junction 25 of the M25 and the surrounding road network. Highways England has already acknowledged that J25 requires considerable improvement just to meet expected standards for the current levels of traffic. The addition of a Business Park (with up to 10,000 jobs) close to this junction is only likely to exacerbate the problems here.

Similar issues were explored in the North East Enfield Area Action Plan (NEEAAP) examination in public in April 2015. The business park developments of NEEAAP sites, like Innova Park, are very nearly contiguous with the proposed Broxbourne Park Plaza developments and a significant part of the road network is shared, including the A10 and M25 J25. Solutions have not yet been found to the issues of traffic congestion and pollution for NEEAAP. As far as the Conservators are aware the traffic modelling by London Borough of Enfield (LBE), which started before the consultation on the Broxbourne Local Plan, will not have taken the projected increases in traffic generated by the proposed Park Plaza into account. Traffic modelling is proving complex and expensive with delays and is still being carried out by LBE.

The Conservators of Epping Forest, therefore, are concerned for two key reasons:

i) Given the problems at J25, the new traffic generated by Park Plaza may attempt to disperse along other routes from the A10 and may try to reach J26 of the M25 as an alternative. Ultimately such traffic would converge on the A121 and J26. Such increases in traffic along the A121 and at J26 would have serious consequences for the traffic flowing into the Forest road network from the A121.

ii) The development of Park Plaza and its considerable proposed expansion on the west side of the A10 is likely to lead to considerable increased pressure on LBE and the sustainability and practicability of its NEEAAP Northern Gateway Access Package (NGAP). One of the original LBE solutions in NGAP for the congestion at M25 J25 was its proposed NGAR route. The Planning Inspector in 2015 directed that NGAR be removed from the NEEAAP and it has been removed. This was consistent with the Secretary of State's decision in 2002 when he stated that: "...the SoS cannot be satisfied that the scheme [NGAR] would not have a significantly detrimental impact on the features put forward as being of European Interest in Epping Forest" [our brackets].

The Conservators of Epping Forest's objections to NGAR were upheld by the SoS in 2002 and by the NEEAAP Inspector in 2015. The Conservators, therefore, wish to register their concerns now on road connectivity in the Broxbourne Plan because there seems to be a lack of evidence and no traffic modelling data to support the sustainability of this location in terms of road connectivity and traffic volumes. The Conservators are concerned that there will be significant, adverse knock-on impacts for the road network around J25 and beyond to the A121, M25-J26 and thereby to Epping Forest SAC. The Conservators would not accept, and would continue to object to, any resurrection of the NGAR proposals or any other proposals seeking to re-direct J25 traffic, including Park Plaza traffic, to the A121 and J26.

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17 Transport

17.3 Broxbourne Transport Strategy

The Conservators of Epping Forest have made a detailed response to the issues of road connectivity and traffic at Section 10.6. This response is directly relevant to the wider Broxbourne Transport Strategy. The Conservators would urge your Council/Herts County Council to share traffic model data with the London Borough of Enfield (LBE) and Epping Forest District Council/ Essex County Council because of the likely significant impacts of developments in Broxbourne on M25-J25, and also on the A121 through Waltham Abbey and towards Epping Forest SAC.