

Stakeholder Reference: 19RES0590

Document Reference:

Part A

Making representation as Resident or Member of the General Public

Personal Details	Agent's Details (if applicable)
Title	Mr
First Name	Terry
Last Name	Blanks
Job Title (where relevant)	
Organisation (where relevant)	
Address	, ,
Post Code	
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E-mail Address	

Part B

REPRESENTATION

To which part of the Pre Submission Epping Forest District Local Plan does this representation relate?

Paragraph:

Policy: None of the above

Policies Map:

Site Reference: None of the above

Settlement: North Weald Bassett

Do you consider this part of the Pre Submission Local Plan to be:

Legally compliant: Don't Know

Sound: No

If no, then which of the soundness test(s) does it fail? Justified

Complies with the duty to co-operate? Don't Know

Please give details either of why you consider the Submission Version of the Local Plan is not legally compliant, is unsound or fails to comply with the duty to co-operate; or of why the Submission Version of the Local Plan is legally compliant, is sound or complies with the duty to co-operate. Please be as precise as possible.
Please use this box to set out your comments.

As a long term resident who follows local politics and performance I have taken this opportunity to respond to the latest version of the Epping Forest District Council (EFDC) plan prior to its final submission. In doing so I have limited myself to comment under the broad headings that have been described as acceptable by EFDC and these relate to paragraphs 17, 36 and 38 of the NPPF.

I chose to move with my family to seeking a village environment with less crowding and good access to London. In 2012 I was encouraged by the decision of EFDC to produce a Local Plan starting with a document entitled Issues and Options which sought quite detailed input from the community. I was further encouraged by the report that EFDC produced on the Issues and Options consultation which was presented to EFDC on 10 June 2013. This report confirmed, and I quote 'There was a clear preference for the 'basic' Spatial Option 1: Proportionate distribution of development (24%).

The basic choice by the whole community to accept the need for a plan that would involve a substantial increase in housing but that it should be proportionate to the existing settlements so as to spread the benefits and burdens of expansion and not overload or change the existing attractions of individual areas was a grown up and encouraging outcome. This was despite other points noted in the report that some of the responses from the more affluent areas of the district suggested that their own areas should be virtually free from additional housing which could be located in North Weald where 'there is plenty of room' and the sizeable airfield is already owned by EFDC.

This view may well have been fostered by the presentation of the various parts of the district being identified in a way that was not consistent with the normally accepted constituent parts. Most areas had plans and maps which were presented according to the town or village bearing its name. Thus a person living in say, Chigwell, could easily turn to the appropriate map or statistic and readily identify the benefits or threats to their neighbourhood.

For reasons that have not been explained, North Weald was treated in a substantially different way and one which made the identification of the detailed plans more obscure than other parts of the district. In fact, any person seeking information from the reports would not be able to use the most basic instinct to look up the information i.e. Where do you live? and turn to the corresponding map as there were at least four distinctly different areas to search for a complete picture. These are:-

North Weald (the largest of the 3 villages)

North Weald Airfield

Thornwood Village

Hastingwood Village but identified in the Plan as Land around Harlow.

In order to ascertain the full picture of plans for North Weald it has thus been more complicated than other areas and the isolation of the constituent parts of the village has served to mask the volume of development proposed.

The 'proportionate' distribution of new housing was frequently and consistently endorsed by the Council leader in the aftermath of the conclusions of the Issues and Options report.

However, the plan that has been adopted for submission is dramatically different from the

aspirations so clearly set out by residents. A simple comparison between two broadly similar villages within EFDC completely destroys any notions of proportionality that were so prominent and important in 2012/13.

North Weald having currently approximately 2,400 existing dwellings is planned to expect a further 2,272 over the plan period. These are identified as 1,050 in North Weald Bassett, plus 172 in the Thornwood part of North Weald and 1,050 in the Hastingwood part of North Weald hidden in the description of 'land near Harlow'. This represents an increase of some 93% by number and 23% of the total planned for the whole district.

Theydon Bois which has currently around 1,950 dwellings is planned to expect a total of just 57 extra by 2033. This equates to just a 3% increase or 1% of the districts total. Interestingly Theydon Bois has the benefit of a Central Line tube station and as a result had previously been considered one of the more sustainable areas for development. It also numbers the portfolio holder for planning and the longest serving of our local members of parliament amongst its residents.

A consultation report in July 2017 on the Draft Local Plan that was presented during autumn 2016 made clear at paragraph 2.11.10 that the responses to the Plan included views that the level of growth proposed was disproportionate in comparison to the size of North Weald Bassett and the level of development proposed in other settlements.

Please set out what change(s) you consider necessary to make the Pre Submission Local Plan legally compliant or sound, having regard to the test you have identified in the question above (Positively prepared/Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Revert to proportionate distribution of spatial policy

If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral part of the oral examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To present a residents view of the diversion from the policy they approved

REPRESENTATION

To which part of the Pre Submission Epping Forest District Local Plan does this representation relate?

Paragraph:

Policy: D 1 Delivery of Infrastructure

Policies Map:

Site Reference: None of the above

Settlement: North Weald Bassett

Do you consider this part of the Pre Submission Local Plan to be:

Legally compliant: Don't Know

Sound: No

If no, then which of the soundness test(s) does it fail? Justified

Complies with the duty to co-operate? Don't Know

Please give details either of why you consider the Submission Version of the Local Plan is not legally compliant, is unsound or fails to comply with the duty to co-operate; or of why the Submission Version of the Local Plan is legally compliant, is sound or complies with the duty to co-operate. Please be as precise as possible. Please use this box to set out your comments.

In the consultation report in July 2017 of the ten most frequent comments made, one was critical of the lack of infrastructure detail and the second was that the policies and proposals would have a negative impact on the character of settlements.

The lack of almost any detail on infrastructure is a significant omission from the Submission version of the Local Plan. The need for sustainability is accepted and understood but the expectation that a dramatic increase in cycling by a population that is living longer (fortunately) and will consequently be less able to cycle to their probably more frequent doctors appointments cannot be ignored.

Commendably EFDC have been able to hold the level of Council Tax for which they are responsible but the spending that has been made on infrastructure is very questionable. The most significant infrastructure of note has been to build a just completed retail shopping centre only accessible by road which could hardly be classed as necessary or sustainable.

Conclusions Applicable to Both Representations

Whilst there has clearly been much activity within EFDC to produce a plan I have formed the opinion that it was not produced by Council employees with detailed knowledge of the area but by a whole series of different firms of consultants who were well equipped to produce impressive reports but which lacked the detail and commitment needed for a coherent and workable plan acceptable to the residents who have actually paid for it.

May I draw your attention to the foreword in the July 2012 consultation document Issues and Options which states. 'We are presenting what we think are all of the current planning issues and potential options, and seeking your views on these. This is your opportunity to get involved and help shape the future of Epping Forest District - this really is all about 'Community Choices'.

And finally to the foreword of the Submission version of the Local Plan produced in December 2017 which contains the claim that 'We have been clear all along that we will do our best to follow what you told us.....'

On the points raised above this seems to be what Winston Churchill described in 1906 as a terminological inexactitude. If this is indeed their best I cannot agree and have severe concerns for the future of the North Weald and EFDC and its residents.

Please set out what change(s) you consider necessary to make the Pre Submission Local Plan legally compliant or sound, having regard to the test you have identified in the question above (Positively prepared/Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Precise details of infrastructure and sources of funds

If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral part of the oral examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To determine why there is virtually no detail of infrastructure in the plan

Please let us know if you wish to be notified when the Epping Forest District Local Plan is submitted for independent examination

Yes

Signature: Terry Blanks Date: 26/01/2018