

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.

Here is my e-mail response to yours of 15 July 2021 concerning the above mentioned Plan.

1. Parish of North Weald Bassett: *I think the entries for the Villages of North Weald and Thornwood in Part 2 of the Plan should be amended to more properly and accurately reflect the overall situation I mention below:-*

Your proposed **Main Modifications** give no serious recognition to, nor reflect the impact of, massive developments the community will face in the Parish of North Weald Bassett. Thus the proposed Main Modification do not address the issue of **Soundness**.

You are requiring the Parish to provide for:-

- A. ***A minimum of 1,050 houses in a “Garden Town Community”*** adjoining Harlow at Latton Priory. (In effect an extension of Harlow into the Green Belt of North Weald Bassett).
- B. ***A minimum 1,050 houses in the Village of North Weald.*** (In effect making it a village larger than many Towns).
- C. ***Approximately 172 houses in the Village of Thornwood.*** (Situated on a major arterial route already heavily congested, especially through Epping).
- D. An ***Employment Estate (ie Industrial Estate) on North Weald Airfield***, immediately adjacent to the Village. (In effect adding to several existing employment sites in the Parish, plus allowing for large distribution units that will result in numerous HGV movements day and night 7 days a week).
- E. ***Increased aeronautical use of the Airfield.*** (I am not aware of any public consultation about this so far).
- F. ***The removal of at least 13% of Green Belt land in the Parish, possible rising to more than 16%*** if other proposed developments are eventually approved. This does not include any Infrastructure requirements that may have an additional impact.

I cannot see how this lions share of development in the District will meet or comply with **Sustainability criteria**, particular in terms of the practical value in promoting **local**:

- *Community & Wellbeing*, especially issues specific to rural communities;
- *Economy & Employment* ie it must result in commuting and traffic movements from far and wide.
- *Historic Environment*;
- *Land & Waste*, especially the massive loss of Green Belt;

- *Landscape*;
- *Transport* – the same point I make regarding Economy & Employment above.

Sadly the developments this Parish faces could be seen as supporting accusations that Central and Local Government are only influenced by Developers with access to hoards of specialist Consultancies, some owned by those Developers.

I feel it is important to highlight to yourselves and the Inspector my concern at the way representations from the community in the Parish of North Weald Bassett over several years, especially from our Parish Council, have had no discernable impact on the consultation processes. To all intents and purposes they have been practically ignored by both your Council and in turn the Ministry for Housing, Communities & Local Government. It is therefore essential that your Plan clearly and accurately gives a true account of the situation.

2. Your Schedule of Main Modifications: (relating to the aspects of Soundness and Legal Compliance addressed by the Inspector). My comments are as follows:-

MM5: It is wrong to drop the words “projected need” and “unmet need” when you are referring to a housing Assessment report. It is misleading to imply actual need. It cannot be more than a “projected need”.

What has happened regarding the 2018 ONS report raised by the Inspector in October 2020?

MM6: You should add a paragraph here to cover the point I make earlier to accurately reflect the overall development situation faced by the Parish of North Weald Bassett, and indeed any other Towns or Parishes that may be facing similar situations.

MM8: Re your point (x), are you also referring to the Village of North Weald? If so, for accuracy you should say so, otherwise it gives the impression that you are only referring to the proposed Garden Town Communities.

This is also relevant to your point (vi) regarding a sustainable local economy ie are you referring to North Weald Airfield?

MM9: Re your point (vi), I don't think it sounds right to say “.....improves, where necessary or appropriate, potential problems.....”. The wording needs to be more positive ie to avoid “improving problems” which could mean making them worse!

MM10, Paragraph 2.35: After “.....positive approach to the consideration of development proposals” add “to sites identified in the Plan”. Otherwise you enter a commitment to agree to all proposals anywhere in the District, because I am sure any developers will use

professionally prepared submissions designed to 'look right'. In the Parish of North Weald Bassett there are already other proposals for areas outside of the Masterplan.

MM10, Paragraph 2.39: The proposed wording has the same effect mentioned above.

MM11, Page 29: Are the figures for North Weald Bassett (including Thornwood) included in the Garden Communities (3,900) or outside those Communities (4,463)?

It should show where the numbers are approximate or minimum (your Plan does not refer to actual numbers anywhere).

Also I do not understand why "Town" is being deleted. What is a Garden Community? It sounds as if you are playing with semantics here!

MM12: Against the figure of 31, are you deleting "54" and why is "Local" being deleted?

MM13: Are the Land Requirements "actual" or "assessed"? I think the latter is more appropriate.

MM14, Paragraph 2.66: In your Point 7, a definition is needed as to what constitutes a "small scale site."

Regarding your Point 5, I think you should include wording that recognises any use of Green Belt land should be very exceptional to comply with Parliament's main purposes in establishing Green Belts around major conurbations, particularly cities like London.

MM15: As in MM11 above, I do not understand why you are deleting "Town". The word is used throughout other parts of your Local Plan. What is a "Garden Community" (semantics all over again, which I believe can be seen as bringing the planning process into further disrepute).

Re your Point (viii), what are "small scale sites"?

Despite the reduction of homes allocations in several areas of the District, you appear not to have reduced the total number for the District. In the interest of accuracy and openness, you should indicate where those homes will now be situated.

Again, what has happened regarding the 2018 ONS report raised by the Inspector in October 2020?

MM18: Again what is a Garden Community?

MM20: You are now referring to a *minimum* of 1,050 homes in Latton Priory Garden Town, instead of *approximately*. Why is this change being made? Is it to cater for the reduced homes allocations in several parts of the District? What is your interpretation of the terms *minimum* and *approximately* you are including in the Local Plan? I suspect you mean *minimum* throughout.

See also **MM87** below.

MM86: For accuracy and clarity you should include the North Weald Airfield proposed Employment (Industrial) site.

In terms of minimising car use, I believe you are being totally unrealistic in your expectations and will be unable to influence or control the situation ie it is unsustainable. The fact that B8 is to be permitted, especially on the North Weald Airfield Employment (Industrial) Site, will mean that there will inevitably be distribution warehouses that demand HGV and other vehicles, including commuters from far and wide, being used 24 hours a day 7 days a week. Is this really a Sound approach required by the Inspector?

MM87: See also my Point 1 above regarding the Parish of North Weald Bassett

You are now referring to a *minimum* of 1,050 homes in North Weald Village (see also **MM20** above). Does this mean the village has to cater for the reduced allocations elsewhere in the District? If so, it shows the degree of openness and honesty being exhibited in this whole process is sadly lacking.

I repeat my comments above under **MM86** regarding car use.

I am also unsure what you intend by referring to plans needing to be “in general conformity” eg in Parts K and N. It suggests that there will be a rather loose approach towards proposed

developments in and around the Masterplan Area and elsewhere in the Parish. With such a massive development of a rural area, there needs to be a much greater ability to be prescriptive in terms of development in a rural rather than urban area.

Your overall approach suggests that you see North Weald Bassett as a satellite expansion of or for Harlow, in which case you need to be clearer about this in your **Main Modifications**. If I am correct, then the continuing existence of an Epping Forest District is likely to follow the same fate as Middlesex!

3. Infrastructure Delivery Schedule:

I do not feel this of any real value as part of the Local Plan because it is so thin on actual detail. The costings are at best sketchy and I doubt would be accepted in any business plan. It probably reflects a general approach to public sector plans involving the ultimate underwriting by public funds. I do however, think it should be possible to be far more detailed in terms of the costs and sources of revenue, given the amounts of funding you are expecting from Developers. It is far from meeting any definition of **Soundness**.

4. **Maps:** Your review of the Green Belt has I believe resulted in you changing some of it to **District Open Land**. Your Plan provides a map of the Green Belt, but I can't see any inclusion of a map or maps showing what you are now allocating as District Open Land. I think it is essential that Maps should clearly identify such land which has technically been removed from the Green Belt.

Incidentally, I am not aware that your consultation concerning your review of the Green Belt included wider public consultation. Did it go below contacting Town and Parish Councils?

If you have any queries or need clarification of the above response, please e-mail me.

Roger Anthony

...Redacted...