

Stakeholder Reference:  
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	Roger	
Last Name	Anthony	
Job Title (where relevant)		
Organisation (where relevant)		
Address		
Post Code		
Telephone Number		
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:

**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.**

To describe in the FOREWORD the Plan as "belonging to all of us" is very misleading and therefore, in itself UNSOUND.

It is more a Plan driven by, and reflecting the interpreted desires, of the NPPF devised under the auspices of the Department of Communities and Local Government (DCLG).

The plethora of consultancy reports - many of which are part of conglomerates with significant development and construction interests - are too numerous for individuals to plough through.

However, the "identified and evidenced need" is highly questionable and has even been challenged by others such as the Council for the Protection of Rural England (CPRE) and London Green Belt Council (LGBC).

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Any Foreword to the final submitted version of the Plan should make it clear that many residents and organisations in and outside the District (eg CPRE, London Green Belt Council) are seriously concerned about Legality and Soundness of the Plan, This includes the way an increased allocation of housing requirements is being imposed/threatened by the DCLG if the deadline of 31 March for receiving the Plan is missed; and by the way that the protracted process of a "Duty to Co-operate" has impacted on yours and other Local Planning Authorities within the Metropolitan Green Belt in terms of delaying the production of Plans.

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

No, I do not wish to participate at oral examination

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Chapter 1 - Introduction and Setting the Scene

The content understates the significant effects and influences of Commuting to and from the District, particularly on the London Stansted Cambridge corridor. It is therefore UNSOUND.

The District's proximity to London has a strong influence on the demand for housing within the Metropolitan Green Belt.

The relatively new and fast developing nearby city of Chelmsford is also highly likely to create a strong demand for housing in the Metropolitan Green Belt (ie an ability to choose and commute easily between two cities from a rural location).

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Insert something on the following lines [you may have access to more up-to-date statistics]:

According to the Office of National Statistics (ONS) latest census, published in 2014, 21% of London's workforce, including in the City, are choosing to live outside London and travel into the capital. This is in addition to the proportion of locals who also travel into London to make up its workforce. Essex is shown as one of the top locations for such commuting, with Epping Forest having the highest at 24,500 (whilst also receiving 9,800 commuters from London).

Given that Londoners are also moving out to get away from the pressures of a vastly changing city, plus benefit from selling their London properties for 2 or 3 times more than what it costs to move to Essex, again including Epping Forest, this also a significant factor.

Some 8 miles east from North Weald begins the City of Chelmsford whose Plan till 2036 involves building around 800 houses per year (some 17k+ in total). Epping Forest District is well within commuting distance of that City. In effect we have 2 cities on our door-step.

We therefore, face strong pressures from those directions, particularly in relation to demands for Green Belt land.

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Settlement:

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Sound: No

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

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

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Chapter 2 - Strategic Context and Policies

I think these are UNSOUND, NOT POSITIVELY PREPARED, NOT OBJECTIVELY ASSESSED NOR LEGALLY COMPLIANT.

For the first time we are able to see more clearly the detailed Plans for the "Gilston Garden Town" approach to the west, south and east of Harlow (see paragraph 2.1) prepared in the context of a "Duty to Co-operate".

It should be made clear that the process followed here has not involved the same detailed consultation applied to the Local Plan as a whole, even to the extent of having excluded North Weald Bassett Parish Council from such involvement. Indeed the significant area of the Parish affected by the Plans is debarred from inclusion in a Neighbourhood Plan for the Parish.

Yet the plans for North Weald village are claimed to be linked to Harlow's development. In fact the housing proposals for the village equate to those for Latton Priory, which must mean that North Weald village is being developed as part of or into a Garden Town Community.

Consequently, it is more than misleading not to have included the changes relating to the overall "Gilston Garden Town" in Appendix 6 to show the actual effect of the proposed developments, including on the Parish of North Weald Bassett.

It appears to be the case that a number of detailed discussions have been taking place with landowners and developers. Referring to "and others" (eg in paragraph 2.4) when covering all those that have been involved in the "Duty to Co-operate" approach means The Government Inspector and public generally will not know who was/is involved in the process, including non-statutory and private interests; and who were debarred.

In Table 2.1, what exactly is the asterisk for against Harlow and what is the number 2 actually for?

The paragraphs and SP policy relating to THE GREEN BELT AND DISTRICT OPEN LAND effectively sets a precedent that drives 'a coach and horses' through the Metropolitan Green Belt in the District, especially (on this occasion) in the Parish of North Weald Bassett.

The so-called minor changes made in 1998 have now become a justification and yardstick for much larger changes to the Green Belt now and undoubtedly in the future.

The Spatial Policy here is therefore, in my view not legally compliant, totally unsound, unjustified, not consistent with national policy; and at total odds with Parliament's intentions when creating the Metropolitan Green Belt. Instead it is a policy that creates lucrative opportunities for landowners and developers, plus sets a precedent for eating away at the Green Belt at an ever increasing rate.

The DESIGNATION OF DISTRICT OPEN LAND is mentioned, but exactly what is it, where is it and why is it needed?

As far as I am aware, your review of the Green Belt did not entail public consultation, is in my view unsound and totally inconsistent with national policy. Again, the Plan should draw the attention of the Government Inspector to this.

This and other Plans are creating seriously validated doubts that the national policy is being adhered to through the processes being followed by the DCLG.

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Policy SP1: Delete Part B. It very widely opens the door to other developments not included in the Plan, by requiring the Council to have a presumption in favour of such proposals. North Weald Bassett Parish has two developers already actively promoting sites outside the plan, one for 300 houses (Ongar Park) and one for a new village (North Weald Park), involving some 750 houses and supporting facilities/infrastructure. Both are unsurprisingly based upon building on Green Belt land.

Duty to Co-operate: 1) Make it very clear that the process has not involved the wider public consultation applied to the bulk of the Plan, including none with the local Parish Council. 2) Delete references about the consultation being with "and others". Replace with details of who were/are those others (eg in an Appendix). 3) Clarify whether North Weald village is being regarded as part of Harlow's Garden Town Communities approach; or whether it is to be regarded as a village or town.

Policy SP5: Include shading on Maps 2.2, 2.3 & 2.4 to reflect the inclusion of sites for gypsies and travellers, in accordance with Policy SP5.

Map 2.4: Include a Key to explain the area to the east that is shaded with continuous green lines.

Policy SP6: 1) Make it very clear that the process has not involved the wider public consultation applied to the bulk of the Plan.

2) More clearly define what is now District Open Land and add a map showing what and where it is.

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No, I do not wish to participate at oral examination

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Policies Map:

Site Reference: None of the above

Settlement:

**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? Positively prepared, Effective, Justified, Consistent with national policy

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

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Chapter 3: Housing, Economic and Transport Policies

I DO NOT THINK THESE ARE SOUND, POSITIVELY PREPARED, JUSTIFIED OR EFFECTIVE.

I can see nothing in this chapter that shows any detailed investigations into the actual changes that will be needed, the likely timescales for provision, nor the impact that can be expected on the need to use Green Belt or District Open Land. If the amount of housing can be quantified in the plan, then presumably discussions with the relevant central Government Departments, local Planning Authorities and what you describe as "Others" will have given some clear indications of the likely scale, costs and timescales for such infrastructure, plus an idea of costs and revenue sources.

It is not clear from the separate Infrastructure Development Plan (IDP) the extent to which

the Policies have been positively prepared and objectively assessed, in consultation with the relevant bodies. At present the number of houses are quantified in the Plan, yet it has not also quantified in the same way the economic, transport and other infrastructure facilities and costs needed to justify the allocation of sites.

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Nothing specific

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Settlement:

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Legally compliant: No

Sound: No

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

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

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## Chapter 4: Development Management Policies

The Policies are NOT LEGALLY SOUND, POSITIVELY PREPARED, JUSTIFIED, or EFFECTIVE.

Policy DM4 (GREEN BELT) is not being applied consistently in terms of what has already been planned in respect of Houses. In terms of the Parish of North Weald Bassett, the criteria in DM4 A (i to iii) are being ignored. For example, the village of North Weald is to have green belt land around it allocated for housing, which equates to some three quarters the size of the existing village; plus industrial land that is around half the size of the existing village. In total it represents an area the size of, if not bigger than the existing village.

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Review the content of Chapter 3 because for example, it reveals how the Policy DM4 either conflicts with the overall proposals in the Plan, or is not being taken properly into account, thus making it unsound.

Include some data and map identifying District Open Land and include a DM Policy covering such Land.

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## REPRESENTATION

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

Paragraph: 5

Policy: None of the above

Policies Map:

Site Reference: NWB.R1

Settlement: North Weald Bassett

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

Legally compliant: No

Sound: No

If no, then which of the soundness test(s) does it fail? Positively prepared, Effective, Justified, Consistent with national policy

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Chapter 5: Places

North Weald: The proposals are NOT LEGALLY SOUND, POSITIVELY PREPARED, JUSTIFIED, or EFFECTIVE.

Paragraph 5.86 defines North Weald Bassett as a Parish comprising North Weald Village, Thornwood and Hastingwood. However, Policy P6 only addresses North Weald Village and also includes the Airfield. Yet you continue to refer to North Weald Bassett, a Parish which also contains the area of Latton Priory that is treated totally separately from the rest of the Parish.

Paragraph 5.89 refers to a North Weald Bassett Masterplan, yet that plan only relates to North Weald Village.

Paragraph 5.98: Large development areas shown in the plan include identified retail centres, yet the massive development of North Weald Village does not show any. You mention having a main and smaller second centre. There is no evidence to show such an approach is viable; rather in practice Town centres struggle for viability, even in major conurbations.

NWB.E4 encompasses an area about half the size of the existing North Weald Village. The fact that it is on the Airfield does not change the practical effect it will have on the Village.

NWB.R1, R2, R3, R4, and T1 also encompass an area about half the size of the existing village, which effectively drives a "coach and horses" through Green Belt Policy. It certainly means that a vast number of existing properties will totally lose an open view of the Green Belt, something that the residents would be justified in expecting not to be the case.

Also, elsewhere in the final submission it says the plans for North Weald village are to be linked to Harlow's development. In fact the housing proposals for the village equate to those for Latton Priory, which must mean that North Weald village is being developed as part of or into a Harlow "Garden Town Community" (as per Latton Priory). The size of your proposals suggest this is the case. If so, what is being indicated in the North Weald Village plan is highly questionable and in urgent need of clarification.

Policy P6 G in effect weakens the likelihood of an appropriate level of infrastructure, especially given the poor state of existing infrastructure.

Policy P6 K is wrongly termed "North Weald Bassett Masterplan"

Policy P6 L suggests a Masterplan is not yet completed, so it cannot exist (as implied in Paragraph 5.99)

Policy P6 M: What is and who are the "Quality Review Panel"?

Policy P6 N suggests a Masterplan is not yet completed, so it cannot exist (as implied in Paragraph 5.99)

Policy P6 O (iv): A new access road from Epping Road has very significant implication for Epping Forest, Epping High Street, North Weald High Road and much wider. It is not a sensible or practical proposition.

The actual table in the Infrastructure Development Plan (IDP) should be part of the data included

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The document needs to be changed so that the issues I mention above are clarified, corrected or altered in the interest of accuracy.

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Chapter 6: Infrastructure and delivery

The Infrastructure Delivery Plan, which is not part of the actual Local Plan submission, raises many questions about actual funding and funding sources. In my view it makes the Plan very UNSOUND.

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The amount of Green Belt land used for development, place by place and including the areas attached to Harlow, should be monitored in percentage terms and figures produced.

The Infrastructure Development Plan (IDP) should either be part of the submission version of the Local Plan or a precised version included, to cover in particular the amount of main funding identified, the sources, the major gaps in funding, and the significant amounts unknown in terms of financial figures and sources of those amounts.

The actual tables in the IDP should be part of the data included under each location in Chapter 5.

The actual responsibilities of the Local Authority, plus any penalties it may incur as a result of a failure to meet the plan in the timescales shown, should be more clearly presented.

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Appendices 1 - 5

No comments

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As part of the monitoring process, include reviewing:-

the IDP funding details.

the effects and influences of Commuting to and from the District, particularly the impact on the London Stansted Cambridge corridor strategy.

the percentages of Green Belt and District Open Land usurped by the developments.

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No, I do not wish to participate at oral examination

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

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

Yes

Signature: Roger Anthony Date: 28/01/2018

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Epping Forest District Council  
[Postmaster@Eppingforestdc.gov.uk](mailto:Postmaster@Eppingforestdc.gov.uk)