



North Weald Bassett

PARISH COUNCIL

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26th January 2018

FAO: The Planning Policy Team

**Re: Epping Forest District Council
Submission Version Local Plan 2011-2033
Regulation 19 Public Consultation**

Please find below the response of North Weald Bassett Parish Council to the above stated public consultation.

It is with extreme disappointment that at its Extraordinary Meeting of 22nd January 2018, the Parish Council felt it had no option but to respond to the consultation with the finding that the Submission Version of the Local Plan does **NOT** meet the test of soundness, and is by consequence '**unsound**'. The reasons for this response are set out in the body of this letter, with emphasis being made on the points highlighted by the underlined wording.

It should be noted at the outset that over the past 6 years whilst the Local Plan has been in production, the Parish Council has worked hard to ensure residents from its Parish are fully aware of the national need for housing, and how this translates at a district level. The Parish Council has raised public awareness of each of the Local Plan consultations, responded to each of these consultations, and worked hard to explain to residents (as best it can) why the Parish of North Weald Bassett (one of 24 parishes/towns in the district) will receive just under 25% of the total objectively assessed housing need for the district.

The Parish Council has tried to raise public awareness that development does not follow administrative boundaries, and feels it has succeeded in helping many residents understand and accept the level of development proposed for this Parish in the Local Plan. However, throughout all the above, residents have made it abundantly clear that this acceptance is based on a clear understanding of the urgent need for adequate infrastructure to cope with not only current shortfalls in provision, but to manage the increased demand as a result of this new development.

In summary, many residents were accepting of this new development providing the appropriate infrastructure was planned for, confirmed and secured, so that the villages (Thornwood, North Weald, and Hastingwood) would not suffer significant detriment as a result of any new development. It should also be noted that the Parish Council understands that the Local Plan is not just about development, but encompasses and addresses many other aspects of growth throughout the District.

The National Planning Policy Framework (NPPF) states that a local planning authority should submit a plan for examination which it considers "sound" – namely that it is:

1. Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;

2. Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;

3. Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and

4. Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

The Foreword of EFDCs submission version of the Local Plan recognises that "development comes with a need for infrastructure for transport, health, education, leisure and social needs" and that "This Plan outlines the necessary infrastructure to support the development of good planning in the district".

Paragraph 150 of the NPPF states that "Local Plans are the key to delivering sustainable development that reflects the vision and aspirations of local communities."

The vision for **North Weald Bassett** included in the submission version of the Local Plan (p142) states that "The needs of North Weald Bassett residents will be met through improved health, education, leisure and community facilities, alongside a strengthened range of shops and services that are complemented by enhanced sustainable and public transport provision." Paragraph 5.98 (p142) of the submission version of the Local Plan states that "The infrastructure needs for North Weald Bassett are set out in Policy P 6 and the Infrastructure Delivery Plan. Policy P 6 North Weald Bassett, under section F states the following:

"Infrastructure requirements must be delivered at a rate and scale to meet the needs that arise from the proposed development, in accordance with the Infrastructure Delivery Plan. Specifically, development in North Weald Bassett will be expected to contribute proportionately towards the following infrastructure items:

- (i) A new primary school;*
- (ii) Appropriate provision of health facilities;*
- (iii) Highways and junction upgrades;*
- (iv) Local upgrades to the existing waste water network and drainage infrastructure;*
- (v) Potential upgrades to existing water, gas, and telecommunications infrastructure;*
- (vi) The improvement and provision of open space throughout the settlement."*

As can be seen there is no requirement for development to contribute to public transport provision. In addition, the infrastructure delivery schedule for North Weald Bassett (8.17, pages 69-72, part B of the Infrastructure Delivery Plan) makes no mention of a requirement for improved, or additional, bus service provision. Page 31 (5.3.2) of Part A of the Infrastructure Delivery Plan states that "Further work is being undertaken by Essex County Council to identify where there are opportunities to improve bus services to support the growth anticipated over the Plan period. This includes improvements to the frequencies of existing services and extending services to evening or weekends where these do not currently exist. Where significant levels of growth are planned there may be opportunities for new services such as potential for a Bus Rapid Transit between Epping and North Weald (subject to feasibility work being undertaken).

The vision for **Thornwood** included in the submission version of the Local Plan (p160) states that "Thornwood will become a more self-sustaining village with improved provision of services, transport,

infrastructure and amenities to cater for the existing and future communities reducing their reliance on other settlements." Para 5.152 in the Submission version of the Local Plan (p160) states that "The infrastructure needs for Thornwood are set out in Policy P 11 and the Infrastructure Delivery Plan. Policy P 11 for Thornwood, point D states the following:

"Infrastructure requirements must be delivered at a rate and scale to meet the needs that arise from the proposed development, in accordance with the Infrastructure Delivery Plan. Specifically, development in Thornwood will be expected to contribute proportionately towards the following infrastructure items:

- (i) Highways and junction upgrades;*
- (ii) Local utilities upgrades;*
- (iii) The improvement of open space throughout the settlement; and*
- (iv) Community uses."*

As can be seen, there is no requirement for development to contribute to public transport provision. In addition, the infrastructure delivery schedule for Thornwood (8.23, pages 86-87, part B of the Infrastructure Delivery Plan) makes no mention of a requirement for improved, or additional, bus service provision. In fact, the schedule makes no mention of any highway measures at all, including public transport, bus service, cycling or walking infrastructure. Thornwood is a small settlement set in-between Epping, North Weald and Harlow, the total quantum of proposed new housing for these three areas equating to just under 64% of the total allocation for the District. Whilst within the Infrastructure Delivery schedules for both Epping and Harlow there is mention of sustainable transport measures, these do not translate into what (if any) effect they are expected to have not only on the future capacity of the B1393 through Thornwood, but how this will help alleviate the already prevalent daily congestion and speeding issues through the village of Thornwood.

Page 22 (5.1.4) of part A of the Infrastructure Delivery Plan states that "Due to the significant level of investment and long timescales involved in increasing road capacity, the strategy for growth within Epping Forest District seeks to concentrate growth within areas with better public transport accessibility and opportunities for walking and cycling, as well as improving public transport and active travel opportunities. P30 (5.3.3) of part A of the Infrastructure Delivery Plan states that "Across the District, the low level of service provision has deterred bus use and a significant level of investment would be required to provide a service at a sufficient frequency, and covering the appropriate routes, to make it attractive to users. Some parts of the District, particularly the north and south, are poorly serviced by current bus routes, with buses not providing sufficient connectivity between key locations. Bus services in North Weald Bassett are limited, and do not provide a service able to sufficiently accommodate the commuter population, with poor linking services to Epping town centre."

Page 20 (5.13) of Part A of the Infrastructure Delivery Plan identifies that the B181 between North Weald and Epping experiences significant pressure, with the junction itself (known locally as 'The Plain') operating noticeably above capacity. It also highlights that the impacts of development against this background growth analysis is likely to result in an increasingly congested and unreliable road network. Work was also undertaken to understand opportunities for mitigation at particular junctions, and that following this work it was recognised that a shift in modal share towards public transport will be required to support growth in a sustainable way. Part 5.1.4 of the same report identifies that "Better bus provision was proposed to accommodate the potential demand from large development proposals".

Following an invitation by Epping Forest District Council to suggest other types of infrastructure projects that should feed into the IDP work, both North Weald Bassett Parish Council, and Epping Town Council, highlighted the congestion both along B181 and at The Plain junction, expressing that failure to address this issue will affect the reliability of the public transport along this route, thus leading to a lack of confidence in public transport and bus reliability - i.e., the sustainable transport modes upon which the successful delivery of growth in these areas is relies.

Paragraph 177 of the NPPF states that "It is equally important to ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion. To facilitate this, it is important that local planning authorities understand district-wide development costs at the time Local Plans are drawn up. For this reason, infrastructure and development policies should be planned at the same time, in the Local Plan."

Throughout the Infrastructure Delivery Schedule, there are a number of 'unknowns' with regard to social infrastructure required to support development, together with a distinct lack of Identified funding. It is also stated that 'further consultation is needed' and the 'Infrastructure Delivery Plan requires updating' as it's a 'live document'.

The NPPF states that here are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles;

- **an economic role** – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
- **a social role** – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and
- **an environmental role** – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

Planning Practice Guidance (Paragraph 010 Reference ID: 12-010-20140306) under the heading "How detailed should a local plan be" states that "Where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interests about the nature and scale of development (addressing the 'what, where, when and how' questions).

Planning Practice Guidance (Paragraph 018 Reference ID: 12-018-20140306) under the heading "How can the local planning authority show that a Local Plan is capable of being delivered including provision for infrastructure" states that "A Local Plan is an opportunity for the local planning authority to set out a positive vision for the area, but the plan should also be realistic about what can be achieved and when (including in relation to infrastructure). This means paying careful attention to providing an adequate supply of land, identifying what infrastructure is required and how it can be funded and brought on stream at the appropriate time." It also states that where the deliverability of critical infrastructure is uncertain then the plan should address the consequences of this, including possible contingency arrangements and alternative strategies. The detail concerning planned infrastructure provision can be set out in a supporting document such as an infrastructure delivery programme that can be updated regularly. However the key infrastructure requirements on which delivery of the plan depends should be contained in the Local Plan itself.

The Local Plan emphasises the need to make 'places', which is reflected in its policy SP 3 Place Shaping.

SUMMARY

For North Weald Bassett, the Submission Version of the Local Plan clearly identifies that there are issues concerning road infrastructure, and limitations (both in terms of available funding sources and capacity to make the required road improvements) and that a modal shift towards sustainable transport methods is the direction for development. However there are no tangible plans for the provision of this infrastructure, both in terms of who will deliver it, how or even if it will be funded. Any suggested provision is based on possibilities, considerations, further feasibility studies, and a heavy reliance on the developer. For Thornwood, the subject of any highway infrastructure or sustainable

transport provision, together with the funding needed for such provision is non-existent. Failure to ensure that the required sustainable transport systems are in place and planned for as part of the development will undoubtedly result in there being no confidence in a sustainable transport system, and a reliance to use the car on roads which are already congested, some operating over capacity. It is the belief of this Council that the level of planned infrastructure needed to support the proposed new development set out in the submission version of the local plan, together with firm details as to how this will be funded and any contingency arrangements that may be necessary should such funding not be made available (either by funding issues or viability constraints), is inadequate. It is therefore disappointing that the Parish Council has no option but to state that the District Council has **failed** in meeting the following two 'tests of soundness':

1. Positively prepared – *the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;*

4. Consistent with national policy – *the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.*

North Weald Bassett Parish Council understands the demands placed on Local Planning Authorities to prepare a Local Plan, and that such a plan is prepared for the district as a whole. A Parish Council has a duty to represent the interests of its residents. It is for this reason, and taking into account the feedback received over the past 6 years (both directly to the Parish Council and individually to Parish Councillors) that the Parish Council cannot ignore the deficiencies regarding infrastructure.

It should also be noted that there are a number of elements to Local Plan making that the Parish Council feels the District Council should be commended for, such as the Duty to Co-operate, and the quantum of evidence provided to support the plan.

As a result of the above conclusion, the Parish Council would like to formally request the right to be heard at any Local Plan examination in public / hearing.

If you have any questions concerning the response of the Parish Council, please don't hesitate to contact me.

Yours faithfully

Susan De Luca
Clerk to the Parish Council

cc. North Weald Bassett Parish Councillors
Thornwood District Councillors
North Weald Village District Councillors
Hastingwood District Councillors
Neighbourhood Plan Steering Group