

North Weald Bassett Parish Council **Response to Draft Local Plan Consultation 31st October - 12th December 2016**

Herewith is the response from North Weald Bassett Parish Council to the Epping Forest District Council (EFDC) Draft Local Plan. In accordance with the spirit of the National Planning Policy Framework, the Parish Council has tried as far as is reasonably practicable to provide a positive response to the consultation, whilst not undermining or underplaying the concerns of both local residents and the Parish Council itself.

The Parish Council has chosen not to respond using the questionnaire provided by EFDC as it was felt this was too restrictive in terms of the opportunities for response. This response is broken down into specific issues, as well as specific policies, statements and allocations contained within the Draft Local Plan. The responses are as succinct as possible when taking account of the gravity of the content of the Draft Local Plan.

It should be noted that whilst every effort is made to ensure responses are kept to the relevant headings, the nature of the issues inevitably means there are cross references under alternate headings.

THE PARISH OF NORTH WEALD BASSETT

As the Parish Council, we have a responsibility to respond on behalf of the Parish as a whole. The Parish consists of three villages - North Weald Village, Thornwood and Hastingwood. It is accepted that development does not follow Parish or District Boundaries, however it is nonetheless the responsibility of the Parish Council to respond on behalf of **all** of its residents. To this extent, it must be pointed out that the content of the Draft Local Plan proposes that:

- **24.29%** of the proposed housing allocation for the Epping Forest District would be accommodated within the **Parish** of North Weald Bassett. This is excessive and does not reflect the wishes of Epping Forest District residents that distribution of housing should take place **proportionately** across the District (10th June 2016 EFDC Cabinet Meeting, report reference C-006-2013/14 confirming that Spatial Option 1 (proportionate distribution of new development) was the clear preference).
- Throughout the Draft Local Plan documents, the Village of Thornwood Common has been assessed in the Evidence Base by various means, such as including it within North Weald Bassett, including it within Epping, and including it within the 'rural' apportionment. It is, therefore, relatively hard to obtain an objective view of the evidence base for Thornwood Common being as the parameters differ so greatly. The Parish Council has taken the decision to address Thornwood Common as a separate entity for the purpose of this response, however many of the statements throughout this response are also pertinent to Thornwood Common.

OBJECTIVELY ASSESSED HOUSING NEED

The Parish Council has reviewed the evidence which was available at the time of the consultation, and taken into account the requirement upon the Local Authority to use an extensive and valid evidence base to establish its Objectively Assessed Housing need (taking into account the duty to co-operate). The Parish Council understands the District Councils proposed Objectively Assessed Housing Need of 11,400 over the Plan period.

Figure 3.5 (Housing land supply: 2011-2033) confirms that there have been 1,173 homes built, 1,194 sites with planning permission to 2016, and expected windfall sites of 595 for the plan period, meaning a figure of 2,962 should be deducted from the 11,400 OAHN, leaving 8,438 homes needed. Assuming the sites around Harlow remain within the plan (accommodating 3,900 homes), this leaves 4,538 homes as the OAHN for the remainder of the District. It is accepted there should be a reasonable buffer of supply of homes for the plan period, and possibly extending beyond the plan period, however no guidance is available in terms of what constitutes an appropriate percentage. The National Planning Policy Framework para 47 gives an indication of the buffers required in terms of the five year land supply, of between 5% and 20% dependent on the timing of the Local Plan. It

is therefore reasonable to assume a buffer of an additional 10% in the OAHN, thereby meaning a realistic figure of 5,445 homes for the plan period would meet to the OAHN and enable a supply of housing beyond the plan period. The suggested sites in the Draft Local Plan (excluding the 3,900 around Harlow) provide enough sites for 7,390 homes. This is **1,945 homes more** than the 5,445 homes needed (which includes an indicative 10% increase in the OAHN). The Parish Council therefore feels the number of sites allocated in the Draft Local Plan is **way in excess** of the actual number of sites needed. This in turn results in the release of green belt to accommodate housing that is not needed.

As part of the Masterplan study, a community workshop was held on 25th January 2014, and the feedback regarding the key issue involving the provision of new homes was that people were fearful that too much or the wrong type of new development would cause the settlement to lose its character and village-feel, so any new development would have to be of an appropriate scale and density to reflect North Weald Bassett's existing characteristics. It is therefore suggested that taking the above points into account, **the number of sites proposed for North Weald Bassett must be reduced.**

With regard to making provision for the Traveller and Travelling Showpeople community, the Draft Local Plan (Figure 3.6) identifies 18 pitches and 1 yard as the remaining requirement of the Objectively Assessed Need to be provided for the Plan Period. The total allocation within the Draft Plan is for 36¹ pitches 1 yard, which in terms of pitches, is **double that identified as needed**. The Parish Council feels this is excessive, and should be reduced.

DEVELOPMENT AROUND HARLOW

After reviewing the extensive evidence, including the evidence provided by way of the Duty to Co-operate, and the available evidence at this time concerning the proposed Junction 7a on the M11, and improvements to Junction 7 of the M11, the Parish Council would **support** the proposed development around Harlow (notwithstanding the comments made further on in this document regarding building on agricultural land), however feels there should be more stringent and qualitative policies within the Local Plan identifying that development around Harlow would only be sustainable subject to:

- confirmation that Junction 7a on the M11 is given approval
- confirmation that improvements at Junction 7 are to take place
- that any development could not take place until such time as the sufficient infrastructure is in place.

In addition, the Sustainability Appraisal report for West Essex and East Hertfordshire housing Market Area states that in terms of the level of development that can be accommodated in and around Harlow, the transport modelling undertaken to date indicates that growth of between 14,000 and 17,000 new homes in and around Harlow could be accommodated provided that key mitigation measures are delivered during the plan period. The current proposed additional housing around Harlow is 16,100 (9,200 Harlow Council, 3,900 EFDC, etc...). This therefore means that Harlow could potentially accommodate further growth at this time of around 900 new homes, and it is suggested that, subject to the M11 improvements identified above, this would be a more appropriate location at which to place development rather than within North Weald Village (subject to the Ridge at the Latton Priory site not being breached).

NORTH WEALD BASSETT MASTERPLAN

Para 5.103 of the Draft Local Plan states that the content of the North Weald Bassett Masterplan has informed the proposals contained within the North Weald Bassett subsection. In addition, throughout the Draft Plan emphasis is placed on the need for Masterplans to ensure the place shaping principals are obtained. It is also understood that policies within the Draft Local Plan pertaining to North Weald have been shaped around the North Weald Bassett Masterplan.

The Masterplan states that feedback from the options exhibition suggests that Scenario B (with no growth to the south of the settlement) is the preferred approach for any new development of the area. The Parish Council **supports Scenario B** - any development being north of the village - as

¹ 36 pitches are 20 around Harlow at Strategic sites Draft Policy SP 3(c), 5 at GRT_N_07 Waltham Abbey, 5 at GRT_N_06 at North Weald Village, 1 at GRT_I_08 at Roydon, and 5 at GRT_E_07 at Nazeing.

being the preferred direction for growth. This is also supported within the various evidence base documents that identify:

- The visually significant slope around Weald Common and the Redoubt (Settlement Edge Landscape Sensitivity Study 2010)
- The land South and South-East of the Village as being the only area of Ancient Landscape (Settlement Edge Landscape Sensitivity Study 2010)
- This entire area is classified as having a 'high sensitivity' to change within the Settlement Edge Landscape Sensitivity Study 2010, identified as being a key landscape/environmental feature having a significant role in contributing to the structure, character and setting of the settlement, and is considered **desirable to safeguard**.
- The Masterplan identifies that the landscape designations and allocation of different levels of sensitivity in both the district-wide Landscape Character Assessment and the Settlement-edge Landscape Sensitivity Assessment suggests the landscape to the south east of the village is the most sensitive to future development (p41).
- The raised land close to the Ongar Redoubt, looking west across the settlement, is also identified in the Masterplan as a **'key view'** and being particularly important (P49).
- Page 83 of the Masterplan identifies the area surrounding the Ongar Redoubt, to the east of the settlement, as being **'inappropriate for development'**.
- The response from English Heritage to the Masterplan study states that 'The Redoubt's key landscape setting is to the north and any development of this area could cause a **negative impact**'. (p93)
- The Masterplan identifies within its assessment of sites that site SR-0269 - the largest expanse of land to the south/east of the village - sits on raised land to the east of the settlement, which affords attractive views over the settlement and is visible from the settlement. The site also surrounds the Ongar Redoubt scheduled monument and was identified during consultation as being **particularly well valued as a site for walking** (P101). Furthermore, the views across the settlement from Ongar Redoubt hill are considered a **major asset** for the character of the area and are listed as a constraint (P102).

The Masterplan states that respondents identified that any development should be sustainable in all aspects; and should be in **proportion** to the existing settlement, retaining a village context rather than establishing a town capacity. Page 151 of the Draft Local Plan (5.123) is placed under a heading of 'Town Centre'. This is clearly incorrect, as North Weald is a Village, and a village that is supported within the Masterplan as being **retained** as a village. In addition, the proposed allocation for North Weald Village (1,580 homes) goes directly against the wishes of Local Residents to ensure North Weald Village **remains** a village. The Neighbourhood Statistics from the 2011 Office for National Statistics states that the number of dwellings in North Weald village at the time of the 2011 census was 2,014. Assuming all the land in the Draft Local Plan was allocated, this would mean an additional 1,580 dwellings. This equates to a **78% increase** in the number of dwellings for North Weald Village, and an additional **80.14%** in residents. The Parish Council argues that this is not place shaping (as indicated by Draft Policy SP4) but **place changing**. The Place Shaping policy is intended to ensure a **holistic approach**, inferring that the 'whole' is being considered, however an 80% increase in residents for a village will inevitably change the village to such a degree that individuals may no longer identify with the village, often resulting in people preferring to move due to this change (as indicated by feedback received by both Parish Council Officers and Councillors to date from local residents and at the EFDC Public Exhibition on 5th November). Page 6 of the Masterplan states that the study articulates a set of development principles, agreed by community stakeholders, which aims to preserve the **discrete 'village-like' character** of North Weald Bassett. It could easily be argued that an additional 1,580 dwellings would not preserve the discrete 'village-like' character of North Weald Village.

The Vision for North Weald Bassett within the Masterplan states that the Aims and Objectives for North Weald Bassett are to help secure the settlement's long term, sustainable future, however point 4 under the 'Objectives' heading suggests a measurable objective to 'Ensure that the number of new homes for the settlement is **appropriate and proportional to the existing settlement size**'. Epping Forest District Council has stated that the decision to focus development around North Weald is to ensure its sustainable future, and that this can only be done by ensuring a sufficient number of

homes are delivered so that the required infrastructure is triggered. However this seems to go entirely against the measureable objective of being appropriate and proportional to the existing settlement size. Two diametrically opposing statements!

DENSITY

Within the Draft Local Plan, Figure 5.1 (p117) categorises North Weald Bassett (village) as a 'Large Village'. Draft Policy SP 4 - Place Shaping (P46) states that to ensure the best and most efficient use of land as a guide the Council will normally expect densities above 50dph in large village centres, and between 30-50 dph in areas outside large village centres.

As identified in the Masterplan, North Weald Village has various density levels ranging between 17 dwellings per hectare (dph) (Tempest Mead) to 58dph (Blenheim square). As a general historic pattern, development of roughly 29dph is seen throughout the settlement. The Masterplan states that density levels of between 30 units and 45 units per hectare appears to be broadly appropriate as a general principle.

Para 3.78 of the Draft Local Plan (p45) states that the 'appreciation of housing density is crucial to realising the **optimum potential of sites**'. Para 3.90 (P48) goes on to state that 'Throughout this Draft Local Plan, the Council is pursuing a strategy which seeks to **minimise the use of Green Belt land** for development'. Appendix B - Housing Delivery Trajectory 2016/17-2032/33 - of the Infrastructure and Delivery Plan shows that all but 1 of the proposed sites (excluding sites around Harlow) are in the 'Low' density category. It is unclear what the parameters are for low, medium or high density, however taking account of Draft Policy SP 4 one can assume:

- High = 50 dph or more
- Medium = 30-50 dph
- Low = below 30 dph

Draft Policy P 6 identifies the individual site allocations with approximate numbers of homes. Table 1 below analyses the size of the site versus the number of houses to obtain an approximate dph for each site, and an average overall. NOTE: This excludes the proposed 225 homes on the Airfield as there are no details as to the exact size of the site being proposed for development.

Table 1 - analysis of site size -v- proposed number of houses in DLP

Site	Site Size (as per Site Suitability Assessment)	Stated approximate no. of homes in DLP	Stated Adopted Development Yield (SLAA)	DPH based on DLP approx housing number
SR-0003	9.14ha	276	200	32
SR-0036	11.38ha (however SLAA states 10.78ha)	288	323	25
SR-072	1.29	21	38	16
SR-0119	Airfield - max 225 homes			
SR-0158a	28.11 (however SLAA states 29.06)	590	1,093	21
SR-0195b	3.42ha	91	102	27
SR-0417	1.84ha	49	55	27
SR-0455	0.81ha	27	12	33
SR-0512	0.61ha	11	12	18
		1,578		Avg 25dph

Analyzing the site sizes against the stated number of homes in the Draft Local Plan gives an average dph figure of 25 for North Weald village. This falls short of both of the appropriate suggested densities in the North Weald Bassett Masterplan, and Draft Policy SP 4. Whilst it is accepted there are some limited constraints on various sites (listed buildings / flood areas, etc) there is clearly **much scope** to increase the suggested dwellings per hectare to bring it in line with those suggested in the North Weald Bassett Masterplan and Draft Local Plan policy. This is something the Parish Council

would support **subject to** a reduction in the release of Green Belt Land in and around North Weald Village. It is clear from the table below that using a density of **40dph**, as supported by both the North Weald Bassett Masterplan and Draft Local Plan Policy SP 4, there is no longer a need to allocate **all** the sites proposed in the Draft Local Plan - in fact the largest site SR-0158a could be entirely removed with the OAHN still able to be accommodated on the remaining sites. This would reduce the need to remove a large area of Grade 2 agricultural land from within the Green Belt. This is further supported by the opening statement in the Draft Local Plan which states 'We have been clear all along that we will do our best **to follow what you told us** and so it seeks to ensure that, as far as possible, the Green Belt is protected for future generations, whilst providing for our housing needs', as well as para 1.73 of the Housing Background Paper which states that 'Land is a finite resource and it is therefore critical that land for development is used in an **efficient and effective way**.'

Table 2 - number of approx homes per site using 40pdh

Site	Site Size (as per Site Suitability Assessment)	Number of homes based on density of 40dph,
SR-0003	9.14ha	366
SR-0036	11.38ha (however SLAA states 10.78ha)	455
SR-072	1.29	50
SR-0158a	28.11 (however SLAA states 29.06)	1124
SR-0195b	3.42ha	137
SR-0417	1.84ha	74
SR-0455	0.81ha	32
SR-0512	0.61ha	24
	Airfield (unable to give 40dph figure as site size given is for the entire airfield site)	225
		2,487

GROWTH OPTIONS AND SPATIAL DISTRIBUTION

Para 8.2.1 of the Sustainability Appraisal outlines the Councils justification for the preferred approach, and states that The preferred option - Option 1 - involves making provision for 11,400 homes over the plan period through a distribution strategy that emerged subsequent to work with neighbouring authorities and a detailed site selection process. The Sustainability Appraisal fails to consider the feedback from the Issues and Options consultation which identified that **proportionate** distribution across the district was the preferred distribution pattern. The Draft Plan itself also fails to take account of this, as is evident in para 3.54 which states that *'In determining the appropriate sites the Council has taken account of the previous consultation responses which considered that new housing should be distributed across the district.'* This statement has omitted **'proportionate'** before distribution, as was what was agreed.

The results of the Issues and Options Consultation shows there was a **clear preference** for the basic spatial option 1: Proportionate Distribution (24%). These results were noted at the 10th June 2013 EFDC Cabinet Meeting. Contained within the Issues and Options consultation was an indicative table that showed what distribution under Option 1 would look like. Since this time, the OAHN has changed. If the proposed growth around Harlow (3,900 homes) was ignored, and a view is taken in percentage terms between those suggested in the Issues and Options Consultation and those included in the Draft Local Plan, there are massive variations, which in turn shows that the preferred spatial distribution by local residents has been entirely ignored:

Location	Issues and Options Consultation Indicative % Proportionate Distribution	Draft Local Plan % distribution Excluding Harlow
Loughton	<1% (constrained)	16.10%
North Weald	5.60%	21.38%

Epping (Inc Thornwood)	14.60%	24.63%
Buckhurst Hill	<1% (constrained)	1.22%
Hastingwood, Matching and Sheering Village	2.50%	1.62%
Theydon Bois	4.90%	4.87%
Moreton and Fyfield	2.80%	1.22%
Roydon	2.60%	0.54%
Lambourne	2.30%	0.00%
Lower Sheering	2.60%	0.41%
Ongar	7.80%	8.12%
Broadley Common, Epping Upland & Nazeing	2.50%	0.00%
High Ongar, Willingale and the Rodings	2.60%	0.14%
Passingford	2.60%	0.14%
Lower Nazeing	5.20%	2.98%
Chigwell	15.60%	5.82%
Waltham Abbey	25.50%	10.83%

Indeed the sequential approach to where new homes will be developed (para 3.54, P38) does not list 'proportionate distribution' as a consideration at all.

In terms of the direction of Growth for North Weald village, Scenario B - no growth to the South of the North Weald Village, was the preferred approach which, as mentioned earlier, is **supported** by the Parish Council.

In terms of the level of growth, Para 5.110 of the Draft Local Plan (Preferred Approach for North Weald Bassett) discusses the two possible scenarios for residential growth, within which are a further three options - Low, Medium or High Growth. The Draft Local Plan proposes an allocation at the higher end of the ranges tested by the Masterplanning Study, having **taken into account land availability elsewhere in the district...**. This seems to suggest that there is a shortage of the supply of available land elsewhere in the District. What is clear from the surplus of sites identified in the Draft Local Plan (enough to accommodate roughly 2950 homes - classed as 'reserve sites') is that there is in fact an abundance of land available for development, and that as such the District Council should reconsider its reasons for assuming option 3 - High Growth - as the only way forward.

NORTH WEALD AIRFIELD

The current Local Plan 1998 and the 2006 Local Plan Alterations contain a number of policies (RST28 Character and Historic Interest of North Weald Airfield, and RST27 North Weald Airfield Leisure Centre, RST29 New Buildings on North Weald Airfield) that provided protection and support for the airfield.

At the EFDC Cabinet meeting of 22nd July 2013, it was agreed that following a report from Deloitte Real Estate setting out their assessment of future development options for North Weald Airfield, the mixed aviation/development based option (Option 3) should undergo a further high level master planning exercise focusing on feasibility, deliverability and incorporating the option in the Local Plan

be undertaken as part of the assessment process leading to the Local Plan Preferred Options consultation in May 2014. The Masterplan study states that Deloitte's "North Weald Airfield Review (5 July 2013)" report assessed three development options for North Weald Airfield and identified issues regarding infrastructure capacity and potential infrastructure upgrades required to serve the proposed developments. Of the three options assessed by Deloitte, the preference identified by the Council was for the Scenario 3, a combined development option which looks at retaining current aviation activity and providing additional mixed-use development. The Parish Council **fully supports** the retention and intensification of aviation at North Weald airfield. Option 3 also identified the retention of existing aviation functions on the western side of the airfield with the remaining areas considered for residential, employment and leisure uses. The Draft Local Plan had considered both the employment and resident uses, however no reference is made to the opportunities that exist at the airfield for leisure and recreation. As is detailed in the Masterplan North Weald was in fact purchased in 1980 by the Council from the MOD, for the **purpose of leisure and general aviation** use (P62). The Masterplan indicates that a Leisure Study was being undertaken by EFDC, however such a study has not been included within the evidence document.

Whilst the Parish Council **supports** the inclusion of SR-0119 as a potential new employment site in North Weald, it feels that Policy P 6 North Weald Bassett should be **strengthened** to ensure the protection and enhancement of not only the important historic contribution (both locally and nationally) that the airfield makes, but to **promote** the Airfield as a suitable site for both **Leisure and Recreation**. This would be supported by the Councils own Draft Policy D 4 - Community, Leisure and Cultural Facilities - (P191).

Paragraph 157 of the NPPF states that 'Crucially, Local Plans should identify land where development would be inappropriate, for instance because of its **environmental or historic significance**.' Clearly this paragraph applies to North Weald Airfield. In addition, paragraph 28 of the NPPF states that in order to promote a strong rural economy, local and neighbourhood plans should support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside. This is further supported by Paragraph 37 of the same document which states that planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities.

INFRASTRUCTURE

At this time, the status of the Infrastructure Delivery Plan is that it is not complete (which is accepted by EFDC). As such, it has been extremely difficult for the Parish Council to fully consider the adequacy of the planned infrastructure to meet the needs of any proposed development. The Parish Council **supports** point c in Draft Policy P 6 which states that '*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*', however would like to see this policy strengthened to make it clear that without the necessary infrastructure, development **cannot** progress. It is understood through discussions with Planning Officers that a failure to provide the adequate infrastructure is not, in itself, a material reason not to meet with OAHN (suggesting case law on Local Plans is proving this), and the Parish Council would like to express its concern regarding this fact. The Parish Council **feels strongly** that a failure to adequately provide the appropriate infrastructure (specifically improvements to the routes connecting North Weald Village to Epping - Road, Cycling, etc) will have a serious detrimental affect not only on current residents, but new residents and residents in Epping, Thornwood and surrounding areas who pass through North Weald Village to reach Epping. Relying on increased public transport (i.e. buses) to meet the transport needs of new and current local residents to link to Epping is not sufficient, and will cause **considerable additional problems** at 'The Plain' junction, which is already suffering capacity issues. **This issue must be appropriately addressed.**

The North Weald Bassett Masterplan states under 'Method of travel to work' that a significantly higher proportion of residents from North Weald Village travel to work by driving a car or van than on a national level (46% compared to 37%) and there is also a greater proportion of people who take the underground (8.9% compared to 2.6%). The argument to provide enough development

to increase the sustainable methods of transport (buses, cycling) to encourage use of these methods is understood, however without the necessary road infrastructure improvements between North Weald and Epping this will simply be sending more vehicles to an already struggling junction, which will not provide reliable bus journeys, which will in turn lead residents to return to driving by car.

It is accepted that cycling facilities / routes may be provided within any new developments to ensure sustainable transport options are available for residents to access the local shops and schools in North Weald. However, it is identified within various supporting evidence, including the Masterplan, that *'there are few, if any, cycling facilities in the area. While distances to key destinations such as Epping and Harlow are not excessive, the environment for cycling is generally not safe or attractive. Connections to Epping are along the B181, which is relatively narrow and busy with traffic. If cycling to Harlow, one would have to negotiate the A414 to the north or the B1393 via Thornwood (also narrow and congested), and then the M11 Junction 7. The local environment is therefore not particularly attractive for cycling.'* Para 5.4.5 of the Infrastructure Delivery Plan (Future Policy Requirements/ Next Stages of Work) states that the proposed levels of growth in the District will have a **significant impact** on existing transport infrastructure. There are a number of constraints associated with expanding the existing highways network, including the protection of Epping Forest, and safeguarding residential areas from receiving diverted traffic flows. These restrictions are set against the backdrop of increasing financial pressures, which pose significant challenges for the future delivery of transport infrastructure.

Essex Highways were commissioned by EFDC in October 2013 to undertake a study to assess the likely highway impact of preferred Local Development Plan options on surrounding key links and junctions within the district. Specific reference has been paid to the urban conurbations of Epping, Waltham Abbey, Chipping Ongar, North Weald and villages south of Harlow. In addition, Essex Highways were tasked with identifying and reviewing transport measures to mitigate the highway impact of proposed developments so that, **where achievable**, a nil-detriment situation can be delivered. This would suggest the possibility of a detriment situation as being an acceptable outcome, which, due to the constraint of Epping Forest between North Weald and Epping would suggest that this route would be one of those that would not be mitigated and would **'suffer a detriment'**. Within the same report the junction approaching Epping on the B181 (identified as junction 8 in the report) was identified as a modelled junction with arms operating **noticeably above capacity**, and was shown to have approach arms with queues exceeding 100 Passenger Car Units (PCUs) in length at various times. The degree of saturation for this junction is either amber or red showing the junction is already at or nearing capacity.

Para 5.1.4 of the IDP states that accessibility work undertaken as part of Local Plan preparation in 2014 assessed proposed housing sites in relation to the public transport network....and... of the towns and villages with limited levels of sustainable transport accessibility. It identified that Chipping Ongar and North Weald Bassett have the largest existing populations and are therefore most likely to support the provision of additional sustainable transport. Better bus provision was proposed to accommodate the potential demand from large development proposals. Furthermore, Para 5.1.5 of the same document states that consultation with Essex County Council has highlighted that there are limited options for local highways interventions within Epping and other key settlements within the District, partly due to the protected land in Epping Forest and the high risk of diverting traffic to residential areas, and that the focus for these areas is therefore to encourage sustainable transport modes such as walking and cycling. Growth located in Epping, Loughton, Chigwell, Chipping Ongar and Waltham Abbey is likely to be accommodated through improving links to public transport services. However, it does not identify how growth at North Weald is expected to be accommodated?

Para 5.5 of the Masterplan refers on numerous occasions to the relief road around Epping, with the trigger point for infrastructure contributions for this road being set at 1,000 homes (Option 2 of the masterplan). In addition, the masterplan states that 'The key issue is likely to be the scale of development that triggers the requirement for a new relief road around Epping and the proportion of funding for this (and major improvements to M11 Junction 7) which will be demanded of the development'. It is understood that the new Epping relief road is **not a viable option** - however this is something that clearly was considered as 'demanded' of the proposed new development in

North Weald and failure to provide this would clearly restrict or even become a barrier not only to new development in North Weald, but also Thornwood and Epping.

Para 9.8 (Project Risks) of the Masterplan identifies the capacity constraints at Epping/Thornwood Road junction, and if these cannot be mitigated by way of significant junction capacity improvements and/or an Epping Relief Road, this will have a **significant impact on the project**.

It is stated within various pieces of evidence that residents of North Weald may find it hard to accept the level of housing needed in order to obtain the improved infrastructure required, however from the evidence available at the time of the Draft Local Plan consultation, including all the background evidence, there is no indication that even with the maximum suggested growth of 1,580 homes, North Weald will in fact get any of the required strategic infrastructure required to ensure transport is effectively managed.

The Sustainability Appraisal para 10.5.11 identifies that *'it is assumed that housing growth will be supported by upgrades to community infrastructure capacity, to the benefit of new and existing residents; however, there is considerable uncertainty at this stage'*. It also states under 10.11.3 that there is also a focus of growth at North Weald Bassett which gives rise to some concerns from a traffic perspective, given existing highways and public transport connectivity.

Para 5.3.1 of the IDP states that consultation with Passenger Transport representatives from Essex County Council has outlined how bus use across the District remains an **unpopular form of transport**. Furthermore, it is also identified that bus services in North Weald have poor linking services to Epping Town Centre. Without the improvement to the road infrastructure, and given the constraints identified above, it is unclear how the linking of services between North Weald Village and Epping could be improved, and this is **not adequately addressed** in the current draft Plan documents.

Planning Practice Guidance 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 (Paragraph: 018 Reference ID: 12-018-20140306)*. At this stage, the Parish Council feels that the Draft Local Plan does not detail the key infrastructure requirements for North Weald Village, which include the requirement to address congestion at 'The Plain - Junction 8'.

The North Weald Bassett Masterplan states that in discussion with Essex County Council and the Highways Agency, the following highway congestion hotspots within and around North Weald Bassett were identified:

- M11 Junction 7
- A414 / Rayley Lane
- A414 / Vicarage Lane W
- A414 / High Road
- Thornwood Road / Epping Road
- B1393 / Thornwood Road

Furthermore, the Masterplan identified the following **key highway capacity constraints** in the area have been identified:

- M11 Junction 7
- A414 between Junction 7 and Rayley Lane
- Junction of Epping Road and Thornwood Road

In summary, the Parish Council feels that it is simply **unrealistic, inappropriate** and **incredibly blind-sighted** to rely on the provision of better bus services to accommodate the possibility of 1,580 homes in North Weald Village. Essex County Council has identified a lack of funding for road

infrastructure, and the constraints of Epping Forest between North Weald Village and Epping has also been highlighted. Without improvements to this junction, no amount of sustainable transport will have the desired effect of limiting the number of additional vehicle movement associated with the amount of proposed development. For these reasons, and the reasons stated above, the Parish Council feels that failure to make significant improvements to the congestion already experienced around 'The Plain - Junction 8' is a **significant constraint** to the proposed development at North Weald.

COMMUNITY FACILITIES

The Infrastructure Delivery Plan sets out the trigger points for various community facilities, including doctors surgeries, sports pitches, primary and secondary schools, etc., however falls short of identifying appropriate locations for such facilities (assumably due to sites, locations and numbers in terms of development not being agreed at this point). The Parish Council would **expect** such facilities to be **accommodated within areas of land already identified for development**, and not to be located onto Green Belt Land following revision of its boundary and adoption of the EFDC Local Plan.

SUSTAINABILITY APPRAISAL

The Sustainability Appraisal sets out the preferred strategy for development across the district, however the Parish Council is concerned that the 'reasonable alternatives' seem to be focused around North Weald Bassett without any evidence or justification as to why this is, i.e option 2 Lower Growth and North Weald Bassett, option 3 Higher growth at North Weald Bassett.

Para 10.5 of the Sustainability Appraisal (Community and wellbeing states that 'from a communities perspective, there is merit to broadly distributing growth in accordance with the existing settlement hierarchy...'. The final settlement hierarchy for the District as detailed in the Settlement Hierarchy Technical Paper September 2015 is as follows:

Town - Chipping Ongar, Epping, Loughton/Debden, Waltham Abbey

Large Village - Buckhurst Hill, Chigwell, North Weald, Theydon Bois

The proposed development at North Weald Village (1,580 homes) is set to propel North Weald village into the 'Town' category, going directly against the principals of the North Weald Bassett Masterplanning Study.

The sustainability Appraisal is also contradictory in a number of places, frequently referring to development being dispersed across the district, then stating there is a clear focus of growth towards Harlow and North Weald Bassett.

In addition, the Sustainability Appraisal regularly refers to North Weald Bassett as a 'Town', when in fact it is a village (or more accurately a trio of villages), and this has led to concern that AECOM (the company who completed the SA) did not have a clear understanding of the settlements within the District.

BUILDING ON AGRICULTURAL LAND

Much of the land identified for proposed development throughout the Parish is classified as Grade 2 Agricultural Land. The National Planning Policy Framework under para 143 references that Local Plan Authorities should, when preparing local plans, safeguard the long term potential of best and most versatile agricultural land. In addition, para 112 states that local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality. This land is classified as the best and most versatile agricultural land. In 2012 the UK's self-sufficiency in all food was 62% - a fall from 75% in 1991 (NFU), at a time when global food production needs to increase significantly, it's important that the British farming industry is supported. In addition, it is estimated that 60,000 new farmers and farm workers will be required 2009-2017 (NFU).

Within the Draft Plan itself, there are a number of statements and policies that do not support building on agricultural land:

- Draft Vision for the District (p30) states that by 2033 Epping Forest District will be a place where a more sustainable local economy, including **food production**, will be developed;
- The Vision for the London, Stansted, Cambridge Corridor Core Area (P26) states that Local Authorities will capitalise on existing economic sectors and promote the growth of expanding industries including **food production**;
- Draft Policy SP 2 - Spatial Development Strategy 2011-2033 (p40) states that the Council will **promote** and **support** growth in the food production and glasshouse industry;
- Para 4.55 of Draft Policy E 3 -Food Production and Glasshouses - (p68) states that 'following a period of difficult trading conditions the market opportunities for home grown products, together with **concern about food security** and the **widening gap** between what the nation produces and requires is leading to renewed aspiration and **real opportunities** for growth in the sector. The industry appears to have good growth prospects, and food has been agreed as one of the sector priorities for the London-Stansted-Cambridge Corridor.'
- Draft Policy E 4 - The Visitor Economy - (P72) states that Opportunities for sustainable development of the visitor economy will be supported by encouraging local food and produce.
- In terms of Green Infrastructure, the preferred approach under para 4.121 (P86) states that the Draft Local Plan seeks to effectively **protect and enhance farmland (for food production)** as well as access to and Biodiversity value of agricultural land.'

Appendix 1 of the Draft Local Plan identifies that the best and most versatile agricultural land are grades 1, 2 and 3a, i.e. it is most flexible, productive and efficient in response to inputs and can **best deliver food and non food crops for future generations**. The National Planning Policy Framework identifies 'Sustainable' as meaning ensuring that better lives for ourselves don't mean **worse lives for future generations**'. This is clearly recognised in the Draft Local Plan (points above). It is therefore clear that any development needed now to meet the Objectively Assessed Housing Need (i.e. better lives for ourselves) that is built on the best and most versatile agricultural land is **not supported by the NPPF** as it will mean the ability of future generations to meet their own needs is compromised.

INDIVIDUAL SITES

SR-003 (field east and west of Church Lane) - approximately 276 homes

The North Weald Bassett Masterplan identifies various constraints and opportunities for development. One of the key constraints on development was identified as the need to protect sensitive uses, particularly residential use located to the east of the airfield from noise and non compatible development, identifying various flight safety zones and approach and take-off cones. These should be fully considered as part of any development on this site, as should the potential access constraints at Church Lane.

SR-0036 - Land at Bluemans, North Weald (north/south of A414)

This is a site of 11.38ha of grade 2 agricultural land. The Parish Council does not feel that meeting the OAHN is exceptional circumstances sufficient to justify the removal of 28.11ha of the best and most versatile agricultural land from the countries farming production.

GRT N 06 (an area of land within SR-0036)

The Parish Council **does not support** the locating of a 5 pitch Traveller Site within the area of land SR-0036 for the following reasons:

- Para 4.147 of the Essex Gypsy and Traveller and Travelling Showpeople Accommodation Assessment on behalf of Essex Planning Officers Association 2014 states that 'Stakeholders suggested that access to services and facilities was important, but acknowledged that locating sites near existing settlements was **likely to be unpopular with both Travellers and the settled community**. These Stakeholders included Two Gypsy and Traveller representatives, a representative of the Showmans' Guild, a representative of Essex Countywide Gypsy and Traveller Unit, and a Community Safety Officer.
- Para 4.148 of the same document indicates that any future provision should be more evenly spread across the District. However, it was also noted that this may not reflect the

preferences of the Travellers themselves, who may want to be situated near family members or existing employment opportunities within Nazeing and Roydon.

- Para 4.149 of the same document states that it was suggested that future provision could be provided within plans for urban extensions, though this would be dependent on whether Travellers would be comfortable with sites located within such developments.
- Under the heading 'Future Site Provision', para 4.35 states that the location of sites should be agreed with Gypsies and Travellers so that they are where the community wants to go. It is understood that this site was put forward by a land owner, and there is no evidence or indication that this site is a favoured location by the Gypsy and Traveller community.
- Para 4.24 in the Draft Local Plan states that there was an indication following stakeholder engagement that the settled and travelling communities favoured a degree of separation from each other. It also states that access to a town yet not adjacent to a settlement community is important to travellers. North Weald village is not a town, and the proposed location of GRT_N_06 goes against the desires of both the travelling and settled communities.
- Figure 41 in the Essex Gypsy and Traveller and Travelling Showpeople Accommodation Assessment (July 2014) shows the Future Supply of Pitches with Planning Permission or Currently Vacant by Local Authority, which identifies that that Epping Forest District had none. On 29th July 2015, following a successful appeal, planning permission was approved for the use of land for the stationing of caravans for residential purposes for one gypsy pitch together with the formation of additional hard standing, the provision of a stable block and a utility/day room ancillary to that use (EPF/1993/13, APP/J1535/A/14/2228944 Land at Woodside, Thornwood, Essex CM16 6LD). Further caravans are already on site, and various appeals are ongoing regarding a refusal of further planning permission. This permission granted on appeal for EPF/1993/13 subsequently suggests that the number of pitches needed for the plan period should be reduced to 17. Furthermore, if it is assumed that the applicant wins his appeal for a further pitch on site, this would reduce the number of pitches needed over the plan period to 16. This calls into question the need for a 5 pitch site, as proposed by the allocation of GRT_N_06. This is further supported by paragraph 16 of the Traveller Site Selection Methodology which states that the Council has identified potential sources of sites; in identifying these sources of sites the Council has had regard to paragraph 011 of the Planning Practice Guidance (Reference ID: 3-011-20140306) - Intensification and/or extension of existing permanent authorised sites and sites with temporary permissions or unauthorised sites that may potentially be suitable for regularisation and also have the potential for intensification and/or expansion. This would also be supported by the Councils own proactive and sequential approach in selecting site, as detailed in the Draft Local Plan under para 3.57 (p39).
- Site GRT_N_06 has been used by the Gypsy and Traveller Community illegally in the past, with various local issues occurring as a result.
- There is concern as such a site being in such close proximity to the setting of a listed building.

All of the above points, not to mention the site allocations double that stated as needed (as referred to on page 2 of this document), implies that this site is not needed, nor suitable, for such development. The District Council should also note that site GRT_N_06 falls on Grade 2 Agricultural Land, and ask that you refer to the comments under Building on Agricultural Land earlier in this document.

SR-0158a (land south of Vicarage Lane) - approx 590 homes

It is important to note that Draft Local Plan figure 5.15 (site allocations for North Weald Bassett) details the site SR-0158a, however this has incorporated SR-0076 which **has not** been included as a potential site for development. It is noted within the Overview and Assessment of Residential Sites that SR-0076 is part of a larger site (presumably SR-0158a) which has been identified as suitable for allocation and it is unlikely that it would come forward as a standalone development, and that it should not be allocated. However, the results of the stage 2 assessment on SR-0158a were competed purely on the original SR-0158a site. It is therefore not clear exactly what site SR-0158a

is, nor the size of the site. If the entire site (including SR-0076) was to be allocated, the relevant evidence paperwork should show this.

The original site of SR-0158a is a significant site of 28.11ha of **well used grade 2 agricultural land**. The Parish Council does not feel that meeting the OAHN and creating sustainable development are exceptional circumstances sufficient to justify the removal of 28.11ha of the **best and most versatile agricultural land** from the Country's food production industry. In addition, the sites houses domestic landfill which is not likely to be mitigated, something recognised within the evidence base documents.

SR0417 - (land east of Church Lane/west of Harrison Drive) - approx 49 homes

The North Weald Basset Masterplan identifies various constraints and opportunities for development. One of the key constraints on development was identified as the need to protect sensitive uses, particularly residential uses located to the east of the airfield from noise and non compatible development, identifying various flight safety zones and approach and take-off cones. These should be fully considered as part of any development on this site, as should the potential access constraints at Church Lane.

SR-0512 - (St Clements, Vicarage Lane West) - Approx 11 homes

Paragraph 85 of the National Planning Policy Framework states that when defining boundaries, local planning authorities should define boundaries clearly, using physical features that are readily recognisable and likely to be permanent. This site falls north of Vicarage Lane West, and seems to create the possibility for encroachment beyond Vicarage Lane West which could be argued would be a more defensible boundary.

GREEN BELT

The Parish Council **understands** the removal of the Tempest Mead development itself from the Green Belt, together with the suggested redefined boundary, however suggests that areas of green, open land to the west of Station Road (which provide a much needed 'buffer' between the Waterman's Way and the noise and air pollution from the Epping and Ongar Heritage Railway) should be protected and designated as 'District Open Land'

Planning Practice Guidance (044 Reference ID: 3-044-20141006) identifies that **Green Belt is a constraint**, and local authorities should take account of any constraints such as Green Belt, which indicate that development **should be restricted** and which may restrain the ability of an authority to meet its need. It also states that local authorities should meet their objectively assessed housing need unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the framework.

Within the background paper entitled '*BGP4 - Green Belt and District Open Land*' the District Council sets out what it believes to be the exceptional circumstances that justify the alteration of existing Green Belt boundaries to accommodate planned development. These reasons fundamentally boil down to the need to promote sustainable patterns of development to meet objectively assessed needs for development in the District over the Plan period that requires some alteration of Green Belt boundaries, and that failing to deliver development to meet those needs would not contribute to the achievement of sustainable development in accordance with national planning policy. The alterations proposed amount to the loss of approximately 1.5% of the current land within the Green Belt.

Paragraph 85 of the National Planning policy framework states that 'When defining boundaries, local planning authorities should ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development. The approach to this Draft Local Plan has been to establish the Objectively Assessed Housing Need **first**, and to provide a 'best fit' in terms of sustainable development **afterward**. This Parish Council has reviewed the available evidence, as well as case law, and is extremely disappointed to find that yet again the need for houses seems to trump all other factors.

THORNWOOD COMMON

Thornwood Common forms part of the Epping Lindsey and Thornwood Common Ward, however for the purposes of this response a more appropriate 'Neighbourhood' area - Epping Forest 005B (Lower Layer Super Output Area) - is used to reflect the actual 'Neighbourhood' of Thornwood Common (however this is also open to interpretation as to whether or not it reflects the actual village itself). According to the Office of National Statistics, under the definition of Neighbourhood, it states that Thornwood Common contains roughly 1600 people or 670 households, however it could be successfully argued that Thornwood Common village 'as felt on the ground' is a smaller settlement.

The proposed allocation of 124 new homes represents an 18.5% increase in homes for the Neighbourhood, which it could be argued is excessive and not 'proportionate'. Due to the small size of Thornwood Common, it is obviously much harder for any level of homes to be incorporated into the village without some form of impact, however the question as to whether the level of homes suggested is sufficient to trigger any required infrastructure improvements -v- the need to retain the small village feel is something that should be given due consideration.

In terms of Employment land, ELR-0093 Woodside Industrial Estate has been identified for intensification. Whilst it is accepted that the site could benefit from improvements in terms of the quality of buildings and facilities available, there are serious concerns at the level of additional HGV and general traffic movements this would place on Woodside - a narrow rural road, used as a rat run and presenting a daily danger to all who use it. The Infrastructure Deliver Plan currently does not fully address how the negative effects of any redevelopment of this site would be mitigated.

In terms of the proposed amendments to the Green Belt, the Local Planning Authority should consider altering the proposed boundaries to remove the land contained within the recently approved application EPF/1454/16 (Outline application for demolition of garden centre & ancillary buildings and erection of 16 dwellings) so as to not create a green belt anomaly and in accordance with para 3.84 of the Draft Local Plan which states that Local Planning Authorities should satisfy themselves that Green Belt Boundaries will not need to be altered at the end of the development plan period.

One of the most concerning aspects of development contained within the Draft Local Plan (both within Thornwood Common and surrounding Thornwood Common) is the unacceptable pressure this will place on the road infrastructure at almost every access point to the village. The site lies on the B1393 Thornwood Road, at one end of which lies the **heavily constrained, over capacity** junction of the Plain (referenced earlier in this document) and at the other, Junction 7 of the M11, which is also recognised as being over capacity. The village of Thornwood Common already suffers regular traffic congestion and air pollution which would be further exacerbated by a failure to adequately address the congestion at the Plain junction, which as mentioned earlier is heavily constrained with no tangible plans within the evidence base set to address this issue.

Within the Epping Forest Local Plan Highway Impact Assessment Technical Note 5 – Preliminary Mitigation Measures Modelling completed in July 2014, the possibility of an Epping Relief road is considered as a mitigation measure, stating that with the relief road and extension in place, there is *potential* for the signalised junction along Thornwood Road to operate largely within capacity in 2036 with no alterations to the junction (other than signal optimisation) required. It also states that given the **lack of space around the junction in which to expand**, removal of peak hour traffic from the junction (via a scheme such as a relief road) would appear to be the **best means of mitigating** the forecast growth in congestion at this junction. As mentioned previously, it is understood this relief road is not a viable proposal. As such, the Parish Council has **extreme concerns** regarding how the proposed development around Epping, North Weald, Thornwood and Harlow, will affect the village of Thornwood Common, and feels that the District Council has not sufficiently addressed this issue, which in itself is a constraint, or even a barrier, to any forecast growth. With a total of roughly **4,400** homes proposed as being located **within a 2 mile radius** of Thornwood Common, the impact on the village without appropriate mitigation measures put in place is almost unimaginable.

POLICIES

Draft Policy **E 3 Food Production and Glasshouses** does not refer to the protection of the best and most versatile agricultural land in the District, and as such is not a fully inclusive policy addressing the need (both locally and nationally) to retain land for food production. This policy seems only to be related to glasshouses. This is considered a significant omission from the Draft Plan, and the policy should be amended accordingly to ensure the best and most versatile agricultural land is preserved for the ability of future generations and sustainable farming.

Both North Weald and Thornwood Common have a history of Flooding, and as is correctly detailed within the Infrastructure Delivery Plan various mitigations measures have been implanted over recent years. Concern is expressed at the proposed level of Housing in North Weald Village, and the impact this will have on the flood defences recently installed. As such, the Parish Council **fully supports** Draft Policy DM 15 Managing and reducing flood risk, Draft policy DM 16 Sustainable Drainage Systems, and Draft Policy DM 17 Protecting and enhancing watercourses and flood defences.

CONSULTATION

The content of the Draft Local Plan would seem to suggest that very little, if any, weight is being given to the responses following the Issues and Options consultation completed by EFDC in 2012. This in turn has led to many residents, and the Parish Council itself, feeling ignored and undervalued. Whilst it is accepted that the District Council has to adhere to various National Policies, and is under pressure from Local Government to 'build, build, build', this should not take place without full and frank consideration being given to residents views and concerns. These views and concerns are valid, current, and reflect the feelings of local people, all of which should be considered and would support the '**holistic**' approach being taken by the Draft Local Plan.

SUMMARY

It goes without saying that perhaps Localism is '**not what it says on the tin**'. The wishes and aspirations of local residents seem to be entirely ignored, with Government leaving the Local Planning Authorities no room to factor in the desires of its current population. Building will take place even if the roads cannot cope, building will take place even if areas are changed beyond all recognition, and building will take place at the expense of everything else.

The foreword on page 6 of the Draft Local Plan states that *'this is not the Council's Local Plan, but rather your Plan for the area'*. Perhaps this statement should have been qualified so that residents understood that it's only their plan for the area within the constraints placed on the Local Planning Authority to deliver the identified Housing Need. The statement itself leads residents to believe that they, collectively, don't want something, they aren't going to get it. It then goes on to state that *'Previously, you have helped us shape the emerging plan through the Community Visioning Consultation in 2010/2011 and then the Community Choices (Issues and Options) consultation in 2012.'* Again, this should have been further qualified to state that the Local Planning Authority can only take account of residents views if it fits with what Government are requiring of them as a Planning Authority. It also states that *'This Plan outlines the necessary infrastructure to support development and good planning of the district'*. Regrettably it doesn't, and this has been the most concerning issue for local residents. Many would say that there has been a failure to manage expectations, which has in turn led to residents becoming disillusioned with the entire process. This is not necessarily the fault of the District Council, but perhaps a failure of the Localism Act to give people the powers over the local area that they have been promised.

The Parish Council understands the pressure that Epping Forest District Council is under to deliver a sound plan, however on behalf of its residents it must state that the level of development proposed is simply unacceptable. The Parish Council respectfully asks that the District Council fully considers the **valid arguments** as set out in this response, and that these are incorporated into the final Local Plan document.

North Weald Bassett Parish Council
6th December 2016