



North Weald Bassett PARISH COUNCIL

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FAO: Planning Policy Team

RESPONSE TO SUBMISSION VERSION OF THE LOCAL PLAN CONSULTATION ON FURTHER MAIN MODIFICATIONS

On 28th October 2022 Epping Forest District Council launched its consultation on proposed further Main Modifications (MM) to the Submission Version of the Epping Forest District Local Plan in order to address issues of soundness and/or legal compliance identified by the Inspector.

The consultation notes make it clear that representations are only invited on the further main modifications highlighted in red. As such, please find below this Council's response to the further Main Modifications proposed:

Main Modification	Comment
MM11	It is noted that the number of homes proposed around the periphery of Harlow (HGGT) but within the Epping Forest District was originally approximately 3,900, however it is being proposed to reduce this for the purposes of determining housing land supply to 3,400 homes being delivered within the Plan period to 2033. This seems at odds with the current consultation on Latton Priory which is proposing up to 1,500 new homes (originally it was stated as being a minimum of 1,050), with the developers of Latton Priory confirming it is their intention that 1,290 will be built by the end of the plan period. This is 240 more than the minimum allocated in the Local Plan, and combined with the reduction of 500 homes seems to suggest that around 740 homes are no longer being built elsewhere. One is left with no choice but to review the housing trajectory to try and discover (or hazard a guess) what this number relates to, and what actual expected housing numbers for HGGT sites now are. This MM adds confusion and lacks clarity, which would cause issues at the time of a planning applications.
MM12	The proposed modification reduces the number of Gypsy and Traveller pitches to be provided during the lifetime of the plan from 32 to 18, however there is no clarification as to where these pitches <u>will not</u> be required. This MM adds confusion and lacks clarity.

MM15	Within MM11, the housing land supply for the HGGT sites within the Epping Forest District is reduced to 3,400 homes, however there is no change to this allocation within MM15, which remains at 3,900. This causes confusion, and lacks clarity.
MM16	The Parish Council raises no concern around the proposed changes to the end of Paragraph 2.94 which includes alterations to the wording surrounding strategic masterplans.
MM18	The Parish Council supports the inclusion of wording which states that the ' <i>sustainable transport provision, including connection into the Sustainable Transport Corridor network, to be commensurate with the phasing of development of Garden Communities, and that this is required to prevent the establishment of unsustainable travel behaviour, and to provide viable alternatives to private car use.</i> ' However the Parish Council feels that the sustainable transport provision should in fact be in place from the point of first occupation, as without this link, poor travel behaviour will undoubtedly ensue.
MM19	The Parish Council raises no concern around the proposed changes to part C of SP4 which includes alterations to the wording surrounding strategic masterplans.
MM21	The Parish Council raises no concern around the proposed changes to parts C and D of SP5.
MM22	The Parish Council supports the removal of RUR.R1 from the housing allocation, along with removing the Green Belt alteration, resulting in the area continuing to be washed over by Green Belt.
MM27	The Parish Council supports the addition of 'housing for older people' within the range of types, tenures and houses proposed for Policy H1.
MM40	The Parish Council supports the inclusion of a statement which confirms that EFDC will create an electric vehicle charging strategy to maximise opportunities to improve electric vehicle charging.
MM41	The proposed modifications in MM41 seem to soften the requirement for Electric vehicle charging points, specifically with the deletion of part G, and the inclusion of the phrase 'has regard to' rather than 'will be required'. The Parish Council would not support any proposal that resulted in a weakening of the need for developers to install charging points.
MM86	The Parish Council supports the proposed modification to paragraph 5.92.
MM87	<p>Whilst the Parish Council supports the proposed addition to Part F of Policy P6, it does not support the proposed deletion of the following wording '<i>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 Schedule and its wider infrastructure objectives.</i>' The loss of this sentence removes any requirement in terms of when infrastructure must be delivered to ensure the development is in fact sustainable.</p> <p>The Parish Council supports to proposed modifications to Parts K, M, N and P of Policy P6.</p>
MM96	Whilst the Parish Council supports the proposed addition to Part D of Policy P11, it does not support the proposed deletion of the following wording ' <i>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 Schedule and its wider infrastructure objectives.</i> ' The loss of this sentence removes

	any requirement in terms of when infrastructure must be delivered to ensure the development is in fact sustainable.
MM100	The Parish Council supports the removal of RUR.R1 as an allocation.
MM109	The Parish Council feels that the proposed modification to include the wording 'at the right time', is not sufficiently robust as it is entirely ambiguous. 'At the right time' means different things to different parties. Suggest that this wording is strengthened to read 'at a time agreed between the developer, the Local Planning Authority and the Utility provider'.
MM115	The Housing Trajectory proposed for the Harlow and Gilston Garden Town has altered significantly, and there are inconsistencies with the figures. The Water Lane allocation has dropped 500 to 1,600 homes and there is no justification or supporting evidence as to why this is. The Latton Priory site is still stated as having a minimum of 1,050 homes, however as mentioned under this Council's comments to MM11 the developer is proposing 1,500 new homes with 1,290 built to the end of the plan period. These inconsistencies need to be addressed. We believe there could be a play on numbers.

Regardless of the further modifications being proposed as part of this consultation, it would be remiss of this Council if it did not once again raise the issue of the Parish of North Weald Bassett being allocated more than 25% of the entire district's housing allocation, without a clear and tangible plan regarding infrastructure to support this quantum of growth. The Planning System seems to allow for a *'build now and worry about if it will actually work later'* approach to development, which will undoubtedly be detrimental to the residents of all three villages that make up the Parish of North Weald Bassett – North Weald Village, Thornwood and Hastingwood. Each of these three villages are unique in their own right, with rural and village characteristics loved and valued by its residents. Should the local plan be found sound, and the development sites within it come forward, the Parish Council will expect each and every developer, along Epping Forest District Council, to carefully consider how new development will fit within the Parish without causing harm to its character or creating further congestion on local roads. Development proposals that fail to appropriately consider these aspects will not be supported by the Parish Council.

Yours sincerely

[email copy]

Clr Alan Buckley
Chairman

cc. North Weald Bassett Parish Councillors
 Clr Chris Whitbread
 Clr Holly Whitbread
 Clr Les Burrows
 Clr Jaymey McIvor
 Clr Richard Morgan
 Mr Alex Burghart MP