



# *North Weald Bassett*

## PARISH COUNCIL

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*Clerk to the Council*  
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29<sup>th</sup> October 2020

Dear Louise

### **Examination of the Epping Forest District Local Plan 2011-2033** **Ref: Office for National Statistics: 2018-Based Household Projections**

I am writing further to my letter to you dated 30<sup>th</sup> September 2020 concerning your letter to Epping Forest District Council dated 14<sup>th</sup> July 2020 (ED111), and the District Councils subsequent response dated 4<sup>th</sup> September 2020 (ED114 and ED114A) published on 23<sup>rd</sup> September 2020.

Within my previous letter I advised that this Parish has been allocated almost 25% of the District Councils housing allocation, the majority of which is on Green Belt land, and that it was essential that residents were given the chance to fully digest and understand (and possibly challenge if deemed necessary) the District Councils position that the updated 2018-Based Household Projections do not represent a meaningful change in the housing situation, and the subsequent justification for Green Belt release.

ED114A is highly technical document which many will find confusing and difficult to both digest and understand. As a Parish Council, we too are in the same situation, and whilst some of the points within the document are clear, we do not possess the technical expertise in house to provide the comprehensive response we would like. This leaves us with the option of employing a consultant to assist us with breaking down the content of ED114A to fully understand EFDC's reasoning behind their decision. This Parish Council has undertaken a cost benefit analysis of doing just that, and has decided NOT to take this action for the following reasons:

1. If the District Council concluded that they would indeed need to reduce their housing allocation, this would ultimately mean that they would need to undertake a great deal of further work to establish which sites would either be removed from the Local Plan, or which sites would have their housing allocation numbers reduced. This could effectively set the Local Plan back by years, leaving all areas in the district open to speculative development. Furthermore, the standard method may well apply if this is the case (see point 4.) We therefore feel this is the main reason why a decision has been taken not to reduce the figures, and that the evidence within ED114A has been moulded to fit this conclusion.
2. Should the District Council have concluded a reduction in housing numbers was needed, it is **extremely unlikely** that any reduction in housing numbers would come off the allocations in this

Parish, especially considering the emphasis given to the SAC and the need to reduce pollution in these specific areas. Therefore, this Council would potentially be spending our residents hard earned tax only to benefit other residents in the district, and potentially be allocated more housing than that already allocated (see point 4).

3. This Council believes that the position of the District Council is that the need to provide housing trumps the protection of Green Belt, and that this is evident in the unwillingness of the District Council to maximise any opportunity to reduce the housing figures and save even small parts of the green belt from being released. The resultant response from the District would undoubtedly be that any reduction in housing numbers on the larger sites allocated in the green belt would mean a loss in any associated infrastructure. This Council would argue that it is very hard to see what infrastructure, specifically improved public transport and road improvements, this Parish will benefit from in any case.
4. Conversely, the irony is that if the current figures are successfully challenged and the plan subsequently found unsound, the District Council may well be required to revert to the Standard Method, which would result in almost double the housing being needed for the district compared to that already allocated in this Local Plan. This Parish Council is therefore caught between a rock and a hard place.

This Council asks that the inspector perhaps takes more of a simplistic view of the situation. In your letter dated 14<sup>th</sup> July, you clearly set out figures showing more than a 50% reduction in growth figures per annum 2011-2033 as follows:

	Households in 2011	Households in 2033	Growth 2011-33	Growth per annum 2011-33
<b>2014-based</b>	52,083	66,457	14,374	653
<b>2016-based</b>	51,938	62,781	10,843	493
<b>2018-based</b>	51,938	58,554	6,616	301

The District Council's response is that this '*does not represent a meaningful change in the housing situation from the one which informed it.*' How can it be that there has been a reduction in predicted growth per annum, but if we as a Parish Council are minded to challenge the figures in order protect our green belt, we may well end up with an increase in housing which would see potentially double, if not more, green belt being released.

We ask you to consider that this simply does not make sense.

Yours sincerely

*[sent electronically]*

**Cllr Alan Buckley**  
**Chairman**  
**North Weald Bassett Parish Council**

cc. Mrs Susan De Luca, Parish Clerk  
Councillors, North Weald Bassett Parish Council