

Epping Forest District Council Representations to the Draft Local Plan Consultation 2016 (Regulation 18)

Stakeholder ID 1981 Name Jennifer Page (on behalf of Buckhurst Hill Residents' Society)

Method Survey

Date

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Survey Response:

1. Do you agree with the overall vision that the Draft Plan sets out for Epping Forest District?

Strongly disagree

Please explain your choice in Question 1:

Epping Forest Local Plan - Comments of Buckhurst Hill Residents_ Society We have studied the Draft Local Plan published by Epping Forest District Council, and are responding as part of the Public Consultation. We have found it difficult to formulate detailed comments because the Draft Plan contains very little information beyond basic maps showing sites proposed for development. We have therefore had to base our comments on reasonable speculation as to what may eventually be built. We comment on each of the sites below, but first we have general comments about the Plan itself. **General Comments** The Local Plan contains no details of what form developments might take, beyond mere numbers. We strongly object to the statement in the Plan that inclusion of a site in the Approved Plan will be a material consideration in approving a future Planning Application. We believe that Planning Applications should go through normal planning procedures, and not be biased by an inclusion in a vague Plan which might be 15 years old by the time of the Application. Indeed we note that Cllr Philip gave exactly that assurance to the full EFDC Council as part of his argument for starting the consultation, and so for this to be taken at face value, the wording in the Plan must be changed to say that inclusion will NOT be a material consideration in the planning process. We believe that including a site in the Local Plan that is currently designated as Green Belt goes against the commitment of all Local Councillors and our local MP to safeguard the Green Belt. If this approach is accepted we believe this could place too much significance on any future attempts to develop this land. The Local Plan is completely lacking in proposals regarding the necessary increase in local infrastructure that is required. A general statement that this will be considered is unacceptable. We note that Cllr Philip has also said that Planning Applications will not be approved unless infrastructure is in place, but this is a subjective judgement. Moreover infrastructure is not under the control of EFDC, for instance Essex CC are responsible for roads and education, and are currently reducing their budget. The Local Plan may never be able to be implemented even if approved. The Buckhurst Hill Parish Council Neighbourhood Plan has not yet been published, so we cannot compare recommendations. **The Consultation Process** Considering the importance of the Local Plan, and the effort which EFDC has

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invested over many years, our opinion is that the consultation process has been a shambles, and we cannot see that residents have been given a fair opportunity to give informed comment. A leaflet was supposed to be delivered to every house, but we have learned that many addresses did not receive one, and this even included some addresses directly affected within the site on Lower Queens Road. This is incompetent and unacceptable. The leaflet itself contained no detail whatever, not even maps of which sites were included in the Plan. Most residents could not use the internet to wade through pages of documents not relevant to their own area. Copies of the written questionnaire at Buckhurst Hill Library quickly ran out. We attended the consultation session at Loughton Lopping Hall. Again, the publicly displayed material was general, and showed only basic maps. To find out more detail we had to actively interrogate several of the staff present. This finally revealed further information, but many residents who visited would surely not have known the right questions to ask. It was apparent however that there was actually more detail available than is publicly published, and again, we do not see how residents are expected to make informed comments when that detail is concealed from them. Conclusion Since 2011 two sites earmarked for development in Buckhurst Hill have been approved and are being built; Station Way Roding Valley, and 32 Palmerston Road. The Local Plan has now proposed three further sites. Two of these sites, adjacent to Buckhurst Hill Station, appear to have such grave practical difficulties that they are unlikely to be built on. The third, Powell Road proposes a development not only on Green Belt, but on a scale completely out of character with the local area. The Plan acknowledges there are already issues with traffic congestion, commuter parking and overcapacity of local education and healthcare facilities in Buckhurst Hill. There will inevitably be so-called windfall developments on other individual sites during the next 15 years, and we believe this number will exceed the 90 required by the Plan. We therefore ask Epping Forest District Council to remove all three proposed sites from the Local Plan as they have no realistic prospect of being built, and would further exacerbate the pressure on local services. In the case of Powell Road, we will actively oppose removal of its Green Belt status, and any subsequent inappropriate development. Further, in the case of Lower Queens Road, we demand that EFDC clarifies its intentions urgently in order to eliminate uncertainty among the businesses, tenants, and leaseholders on this site. It is utterly reprehensible that EFDC has caused such disquiet through this Local Plan without any notification or consultation, and seem prepared to perpetuate that for two years until the end of the planning process, or even for the whole 15 years covered by the Plan. We demand EFDC announces within say three months that this site has been removed from the Plan.Redacted.... Chair Vice-Chair
Buckhurst Hill Residents_ Society November 2016

2. Do you agree with the overall vision that the Draft Plan sets out for Epping Forest District?

(blank)

Please explain your choice in Question 2:

3. Do you agree with the proposals for development around Harlow?

No opinion

Please explain your choice in Question 3:

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4. Do you agree with the proposed shopping area in...

Epping?

No opinion

Buckhurst Hill?

No opinion

Loughton Broadway?

No opinion

Chipping Ongar?

No opinion

Loughton High Road?

No opinion

Waltham Abbey?

No opinion

Please explain your choice in Question 4:

5. Do you agree with the proposals for new employment development?

No opinion

Please explain your choice in Question 5:

6. Do you agree with the proposed sites in your area?

Epping (Draft Policy P 1):

No opinion

Please provide reasons for your view on Epping:

Loughton (Draft Policy P 2)

No opinion

Please provide reasons for your view on Loughton:

Waltham Abbey (Draft Policy P 3)

No opinion

Please provide reasons for your view on Waltham Abbey:

Chipping Ongar (Draft Policy P 4)

No opinion

Please provide reasons for your view on Chipping Ongar:

Buckhurst Hill (Draft Policy P 5)

No

Please provide reasons for your view on Buckhurst Hill:

SR-0176 1 Powell Road The site is designated Green Belt. We do not consider the Local Plan constitutes the exceptional need required to remove this status, and will oppose a proposal to change it. Last year we joined nearby residents and Buckhurst Hill Parish Council in opposing the application by **...Redacted...** to build a Care Home on this site. The National Planning Policy Framework (NPPF) permits as an exception, limited infilling under policies set out in a Local Plan. EFDC rejected the **...Redacted...** application because it was far in excess of limited infilling. 31 houses on the same site fails the same test, and by a large margin. But Green Belt was not the only factor in opposing development, and we will continue to oppose any inappropriate development here, including such as is being proposed in the Local Plan.. The site is adjacent to the Nature Reserve of Linders Field. No satisfactory traffic survey was conducted at the time of the **...Redacted...** application. To build individual houses with a much higher car usage would be far worse. The proposed density of houses is completely out of character with the existing houses in the area, and thus would conflict with the Housing Mix Policy of the Local Plan. Construction of individual houses will affect the setting of the locally listed St Justs in the same way as one of the reasons given for refusal for building a single large building. Although approval for a single large building was refused, at least it would have been under single management; building 31 individual houses will make enforcement of wildlife and environment conditions, as are necessary for a site adjacent a Nature Reserve, almost impossible. SR-0225 Queens Road Car Park [This site is at the east end of Queens Road, not Lower Queens Road, as described] EFDC has not published details of what is proposed on this site beyond 44 new flats and retention of existing parking. We therefore have to base our comments on a reasonable assessment of what that might entail. We recognise that this site is underused, but until a detailed design is available which overcomes the practical difficulties, we are sceptical that any development here can be achieved. During construction there would be no parking for commuters, shoppers or local workers there would be considerable disruption of local businesses there would be considerable heavy construction traffic on roads leading to the site there may be damage to the fabric of adjacent buildings on Queens Road due to heavy vehicles. Unlike the other Station Car Parks along the Central Line which are used mainly by commuters, the one in Buckhurst Hill is also used by shoppers and employees of local businesses, and so disruption will be severely felt. Either a large basement will need to be constructed, or the building will need to be several storeys high. If a basement, the effect on water flow would be considerable. It would be expensive, and bring problems of management. The site is narrow, and since access at ground level to the far end of the site will be required for vehicles, including fire engines, it is hard to see

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how multi-storey flats and car park can be fitted in. Moreover, there is an gate at the far end leading to the railway so we presume TfL have a right of way through the site, which will need to be accessible even during construction. New flats on this site will be adjacent to the railway and trains running through the night. Additional parking spaces will need to be included for the flats. These would exacerbate traffic congestion on Victoria Road and the junction with Palmerston Road. The alternative, Princes Road is a narrow one-way street with speed bumps where already old houses are shaken by heavy vehicles. We note that some people were told at the Consultation in Loughton that no extra parking spaces would be provided for flats built on station car parks. We were told there would be, so there is confusion about this. If not, the flats will inevitably use the public spaces, reducing the number available. This would contradict the assurances given that net parking spaces would not be reduced. As each flat will need to have its own reserved parking space, there will need to be separate access arrangements and security. We question what ownership model will be proposed for the flats. We doubt if purchasers will be attracted by co-existing with a large public car park, even if the site is divided vertically. A multi-storey building could affect the amenity of adjacent houses. We doubt if this development would be economically viable. If this site is redeveloped, the old Station House at its entrance, a historic local building, should be restored and converted, and not demolished. SR-0813 Lower Queens Road At the Consultation in Loughton on November 7th, we learnt that the plans for this site could involve demolition of two existing buildings and replacement by a larger building incorporating a larger number of flats and retail space. The blocks are those on the west and south boundaries of the site, currently containing 24 flats and four retail units. The new block would contain 35 flats, plus additional retail units. We believe this proposal to be completely economically unviable, given that the existing blocks appear to be able to last for at least the 15 years of the Plan. The Local Plan merely includes the simple sentence that the stores will somehow yield an additional 11 flats, implying that only the block to the west will be redeveloped. This is not what the map we were shown at the Consultation conveys; the large scale map includes both blocks within the red line enclosing the site boundary. Indeed developing just one block would appear to make finding space for an additional 11 flats and retail space even less feasible. As far as we know this is the only site in the Local Plan where existing buildings are to be redeveloped. Yet EFDC has failed to consult with existing residents and businesses, and even failed to deliver their leaflet to some addresses, leaving many residents unaware of the threat to their properties. The leaflets, even when delivered, contained no map of any site. This has caused outrage amongst tenants and businesses, and leaseholders cannot now sell their properties because they are blighted. Furthermore, if EFDC really intends only to redevelop the block containing the stores, then why is the second block included in the site? To have done so with no actual plans and cause uncertainty and blight to these residents for perhaps five years is reprehensible. During construction the occupants of the existing 24 flats would need to be re-housed, or simply be forced to relocate the four existing business owners would need to find new premises the subway under the railway would be closed the residents on the east side of Buckhurst Hill would be considerably inconvenienced We have learned that some of the flats are held leashold. Do EFDC really intend to use Compulsory Purchase Orders to redevelop this site, or were they ignorant of this? The site appears to be too small to accommodate an underground car park, so the proposal for a larger building will lead to reduced parking, both for flat owners and visitors to the new retail units. The trees on the site may be covered by TPOs. Any new larger building will affect the amenity of the flats to the north of the site. A higher building may affect the view across the railway from Queens Road. New flats on this site will be adjacent to the railway and trains running through the night. It does not seem economically sensible or viable to demolish sound buildings containing 24 flats, to gain just an extra 11. It was mentioned that this scheme would be done in conjunction with TfL opening the entrances at the south end of the Underground station. That would of course be welcome, but it is not a benefit of this scheme. The entrances can be opened without this scheme, and indeed in a much shorter timescale than envisaged by the Local Plan. The Plan itself concedes that there may be insufficient local demand for additional retail space. Finally, the detailed proposals for this site are not to be found in the online consultation document, nor were they on public display in Loughton. We had to interrogate one of the Council Staff present, who went to consult a large folder. This is an appalling way to run a public consultation. How are members of the public supposed to comment on proposals they are not being shown? We condemn the insensitivity of EFDC towards the existing occupiers of this site.

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North Weald Bassett (Draft Policy P 6)

No opinion

Please provide reasons for your view on North Weald Bassett:

Chigwell (Draft Policy P 7)

No opinion

Please provide reasons for your view on North Weald Bassett:

Theydon Bois (Draft Policy P 8)

No opinion

Please provide reasons for your view on Theydon Bois:

Roydon (Draft Policy P 9)

No opinion

Please provide reasons for your view on Roydon:

Nazeing (Draft Policy P 10)

No opinion

Please provide reasons for your view on Nazeing:

Thornwood (Draft Policy P 11)

No opinion

Please provide reasons for your view on Thornwood:

Coopersale, Fyfield, High Ongar, Lower Sheering, Moreton, Sewardstonbury, Sheering, Stapleford Abbots (Draft Policy P 12)

No opinion

Please provide reasons for your view on Coopersale, Fyfield, High Ongar, Lower Sheering, Moreton, Sewardstonbury, Sheering, Stapleford Abbots:

7. Do you agree with the approach to infrastructure provision being proposed in the plan?

Disagree

Please explain your choice in Question 7:

8. An Interim Sustainability Appraisal has been commissioned to support the Draft Local Plan. We would welcome any comments you may have on this.

9. Do you wish to comment on any other policies in the Draft Local Plan?

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