

North Weald Park

EXAMINATION IN PUBLIC, EPPING FOREST DISTRICT DRAFT LOCAL PLAN

MATTER 4: SPATIAL STRATEGY / DISTRIBUTION OF DEVELOPMENT

HEARING STATEMENT ON BEHALF OF QUINN ESTATES LTD AND REDROW PLC
LAND AT THE FORMER NORTH WEALD GOLF COURSE, NORTH WEALD BASSETT

JANUARY 2019



Epping Forest District Local Plan

Submission Version December 2017

Hearing Statement on Behalf of Quinn Estates Ltd and Redrow PLC

Matter 4: Spatial Strategy / Distribution of Development

Land at the Former North Weald Golf Course, North Weald Bassett

Introduction

We are instructed by Quinn Estates Ltd and Redrow PLC ('Quinn Estates' and 'Redrow'), to produce a series of Hearing Statements in relation to the 16 Matters and associated Issues and Questions (MIQs). This Hearing Statement relates to **Matter 4: Spatial Strategy / Distribution of Development**.

Quinn Estates and Redrow are promoting a site located to the east of North Weald Airfield. Whilst the site has been promoted throughout the Local Plan process (for example, at Regulation 18 and Regulation 19 stage), it is not yet proposed to be allocated within the Plan.

There is a current planning application (ref. EPF/1494/18) for the site, summarised below. This is only site in the North Weald Bassett area which is subject of a current planning application. Quinn Estates and the landowner have entered into a contract of sale with Redrow (**Appendix 1**), clear evidence of: the intent of Redrow to develop the site; that housing delivery could begin within five years; and that the site is 'deliverable' as per the NPPF definition. Given the Government's recognition of the importance of deliverability, this is a consideration that should weigh in its favour of this site.

A letter from Alex Stark, the Regional Managing Director at Redrow, provides further evidence to show that the site is imminently deliverable with completions achievable in 2020 (**Appendix 2**). Thus it can be reasonably concluded that this is the only large site that can make a timely and valuable contribution to the delivery of housing in the early years of the plan period, making a significant contribution to addressing the inevitable shortfall in the initial years of the Plan period, from which the Council will find incredibly difficult to recover, particularly given the difficulty in managing a stepped trajectory which has proved unworkable elsewhere.

Quinn Estates and Redrow have a very strong track record in the successful promotion and delivery of a wide range of other sites in a wide variety of different settings. For example Quinn Estates is Swale Borough Council's partner for the delivery of a major regeneration scheme in Sittingbourne town centre that will create hundreds of new homes (development that a number of other companies failed to deliver over a period of more than two decades).

It also has a strong reputation for the delivery of employment floorspace, eg it partnered with Ashford Borough Council and has now completed an 88,000 sq ft grade 'A' office building adjacent to Ashford International station. This represents the largest speculative office development in Kent in the last decade and will sustain over 600 new high value jobs. The building is now complete and already 75 *per cent* occupied. Quinn Estates have also secured planning permission for a comprehensive mixed-use development (including housing and a sports hub) on the edge of Herne Bay in 2015 and this the only allocated strategic site in Canterbury which is currently being delivered. As is apparent from the February 2017 Government White Paper *Fixing our broken housing market*, the Government considers that a developer's track record in delivering major schemes is an important consideration.

Current Planning Application

The current application¹ is the culmination of three years’ worth of technical work, thousands of experts’ hours, and over £1.25m of investment. This places our site at least 1.5 years’ ahead of any other site in terms of its ability to deliver housing completions and secure inward investment.

Permission is sought for up to 690 dwellings, of which full planning permission is sought for 135 dwellings. It includes a range of non-residential land uses including education, healthcare and sports facilities which will serve the development and which will be of benefit to the wider community. The applicant is working with the Council under PPA to address all consultation responses received². A considerable level of public support has been registered for the application.

Summary of Council’s Spatial Strategy

The Council has identified a requirement for 11,400 net new homes over the Local Plan period for Epping Forest District of which ~3,900 will form part of the expansion of Harlow albeit within Epping Forest District. The remaining EFDC housing requirement will be delivered across the District on a range of sites.

The Council acknowledges under-delivery in the early years of the Local Plan period (2011 – 2016). To address this and provide a for a five year supply of housing sites the Council has identified a number of smaller sites across the District which are less reliant on the provision of strategic infrastructure.

The Council identifies that ‘Garden Communities’ will make a significant contribution to supply but within the first five years. It argues that seeking to address undersupply within the first five years of the Plan could result in a significant increase in homes across the District but without necessary infrastructure and could result in significant impacts on vulnerable environmental designations including the Epping Forest SAC. Instead, it says that it has adopted a smoother and more realistic approach in addressing identified undersupply over a longer period (from the beginning of the plan period the Council has delivered on average just 43% of the annualised target that it is currently working to as noted in **Table 1**).

Table 1 – EFDC Housing Delivery since 2011/12 to 2016/17

	OAHN Annualised Housing Target	No. Of Housing Completions	% of “OAHN” (518 dpa)
2011/12	518	288	56%
2012/13	518	89	17%
2013/14	518	299	58%
2014/15	518	230	44%
2015/16	518	267	52%
2016/17	518	157	30%
Total	3,108	1,330 (average 222 p.a.)	43%

Source - Housing Implementation Strategy (December 2017)

¹ Hybrid planning application EPF/1494/18 submitted 30 May 2018.

² Further details of consultees’ responses will be provided in a later Hearing Statement in relation to Site Selection on the basis that we have not, at the time of writing, been scheduled to appear at the North Weald Bassett EIP Session.

The Need for Housing

We briefly touch on housing need because that will be one of the greatest factors influencing the spatial strategy but we will comment on this in greater detail in our Matter 5 Statement, particularly in relation to the robustness of the Council's assumptions.

Draft **Policy SP2** outlines how the Local Plan will provide a minimum of 11,400 new homes³, allocated in accordance with the EFDC's chosen sequential approach, also set out in draft **Policy SP2. Table 2** sets out how EFDC intend to distribute these new homes across the District.

Table 2 – Distribution of new homes under Policy SP2

Settlement	Allocated Housing
Sites around Harlow	~ 3,900
Epping	~ 1,305
Loughton	~ 1,021
Waltham Abbey	~ 858
Ongar	~ 590
Buckhurst Hill	~ 87
North Weald Bassett	~ 1,050
Chigwell	~ 376
Theydon Bois	~ 57
Roydon	~ 62
Nazeing	~ 122
Thornwood	~ 172
Coopersale, Fyfield, High Ongar, Lower Sheering, Sheering and Stapleford Abbots	~ 175
Rural East	~ 41
Total	~ 9,816

Even following this sequential approach, the Council has failed to identify sufficient land to deliver 11,400 homes.

However, the **actual** OAHN is higher than this figure. The Strategic Housing Market Assessment (SHMA, 2017) identifies an objectively-assessed need ('OAHN') for 51,700 new homes across East Hertfordshire, Uttlesford, Harlow and Epping Forest. For EFDC this equates to 12,573 new homes for the Plan period.

The Council cites environmental, policy and infrastructure constraints as barriers to meeting the full OAHN⁴ but there is insufficient evidence to warrant a reduction in housing provision or departure from **Paragraph 11** of the 2018 NPPF.

Issues with EFDC's Selected Sites

Furthermore, of the identified sites, a number have physical constraints or existing uses which mean that they are unlikely to come forward for residential development in the short-term. Others are subject of significant opposition (often on sound planning grounds) as we will now discuss.

Car park sites

Taken together the car parks in **Table 2** equate to approximately 577 dwellings or c 5% of the OAHN.

³ An annualized target of 518 dwellings

⁴ Draft plan, paragraph 2.43

Table 3 – Proposed Car Park Allocations

Site	Approximate number of homes
Epping	
EPP.R3 Epping London Underground Car Park	89
EPP.R6 Cottis Lane Car park	47
EPP.R7 Bakers Lane Car Park	31
Loughton	
LOU.R1 Loughton London Underground car park	165
LOU.R2 Debden London Underground car park	192
Buckhurst Hill	
BUCK.R2 Queens Road car park	41
Theydon Bois	
THYB.R2 Theydon Bois London Underground Station car park	12
Total number of homes	577
Total percentage of actual OAHN <i>(12,573 dwellings over the plan period)</i>	4.6%
Total percentage of adjusted OAHN agreed in MoU <i>(11,400 dwellings over the plan period)</i>	5%

However, development on these faces a significant amount of public opposition, for example see the media extracts at **Appendix 3**. Key issues include:

- loss of parking for commuters, shoppers or local workers;
- considerable disruption of local businesses;
- considerable heavy construction traffic on roads leading to these sites;
- taking car parks out of use whilst the sites are developed – this presents a significant threat to the functioning of high streets, which presents a risk to the livelihoods of small retailers and goes against the Government’s aspiration to support high streets; and
- spill-over of commuter parking to surrounding residential streets.

Photographs of the Epping car parks are at **Appendix 4**. These were taken on a typical weekday morning and clearly show that all three car parks are full. The Council has not provided any evidence to demonstrate that the car parks represent viable development propositions, particularly in light of the need not to lose necessary car park provision which would be to the detriment of the local economy and could promote longer, unsustainable commuter car journeys.

Indeed, the *2016 Settlement Capacity Study*, prepared by Fregonese Associates provides an analysis of site capacity and values at Appendix 8, also highlighting the difficulties of re-providing publicly-available car parking on-site. Within the study, no account is made of build costs relative to the assumed Gross Development Value of potential developments.

Furthermore, and if harm to the local economy could be avoided, these sites would make very little, if any, meaningful contribution to local service provision and infrastructure.

Large Sites

The Council is proposing to a number of larger sites as summarised in **Table 4**.

Table 4 – Proposed Large Sites (> 1ha)

Site	Approximate number of homes
South Epping Masterplan Area	950
EPP.R3 Epping London Underground Car Park	89
EPP.R4 Land at St Johns Road	34
LOU.R1 Loughton London Underground Car Park	165
LOU.R2 Debden London Underground Car Park	192
LOU.R4 Borders Lane Playing Fields	217
LOU.R9 Land at Former Epping Forest College	111
LOU.R14 Land at Alderton Hill	33
Jessel Green Masterplan Area	154
Waltham Abbey North Masterplan Area	612
ONG. R3 Land South-West of Fyfield Road	27
ONG.R4 Land North of Chelmsford Road	163
ONG.R5 Land at Greensted Road	107
ONG.R6 Land between Stanford Rivers Road and Brentwood Road	33
West Ongar Concept Framework Plan Area	234
CHIG.R4 Land between Froghall Land and Railway Line	105
CHIG.R5 Land at Chigwell Nurseries	65
NWB.R1 Land at Bluemans	223
NWB.R3 Land south of Vicarage Lane	728
NWB.R5 Land at The Acorns, Chase Farm	51
ROYD.R2 Land at Kingsmead School	21
THOR.R1 Land at Tudor House	124
THOR.R2 Land East of High Road	29
STAP.R1 Land at Oak Hill Road	33
Total no. of homes	4,500
Total percentage of actual OAHN (12,573 dwellings over the plan period)	36%
Total percentage of adjusted OAHN agreed in MoU (11,400 dwellings over the plan period)	39%

The large sites require a step-change in infrastructure provision and it is unlikely that they will come forward for development in the short-term; they will not begin delivering homes until much later in the plan period, and some of these sites will not come forward as anticipated. Whilst the smaller sites noted above might well yield dwellings sooner, they will not deliver the necessary infrastructure to support large-scale growth.

Also, there is considerable opposition to a number of the sites listed in **Table 4**, eg at Jessel Green where much-valued open space – an important amenity – would be lost.

Other aspects of the Council's approach to the identification of land for development appear at odds with the sustainable growth of the District. For example the development of land at Epping Forest College (Ref. LOU.R9) for housing is questionable when there is also a need for enhanced education provision associated with population increase; even if the College had no plans to expand itself, the land could be used for a co-located facility that could share College facilities, making best use of available land and resources.

Similarly, the *Epping Forest District Council Playing Pitch Strategy – Full Analysis (March 2018)* identifies a projected increase in future demand for football across the District. When comparing total supply and demand for all secured sites until 2033, a deficit of total deficit of -97.5 pitches was identified

across the District. Despite this, the Borders Lane Playing Fields (Ref. LOU.R4) are proposed to be allocated for 217 dwellings.

Agricultural Land

Many of the large sites listed in **Table 3** are crop-producing, including land allocated within the South Epping Masterplan Area ('SEMA'); the photographs at **Appendix 5** demonstrate this, clearly showing that it is crop-producing. The SEMA is also unsuitable for residential development due to the steep gradient which means that dwellings will overlook the M25 motorway (also shown at **Appendix 5**).

Notwithstanding such topographical issues, the unjustified choice of crop-producing agricultural land over non-agricultural land finds no support whatsoever in national policy and, indeed, is an issue of such magnitude that it could invite aggrieved parties to seek recourse via the courts which would result in further delay to the progression of this development.

There are alternatives, including the site that Quinn Estates and Redrow are promoting. Whilst this is not within a settlement, it is clear that the settlements cannot meet the significant need for new homes. The Quinn Estates / Redrow site is largely made or re-engineered ground and has been subject of land raising and, as a consequence, therefore will not produce crops again. It is therefore sequentially-preferable to allocate this site ahead of all others being put forward by the Council at this stage. It is also bordered by existing built development or land that is otherwise identified for future development. Whilst it scores less well than other sites in the Council's Green Belt assessment, we have highlighted in previous representations why we disagree with that conclusion, not least because the conclusion is a function of an illogical redefinition of Green Belt parcel boundaries during the assessment process – a matter that we will ask the Inspector to pay close regard to in our subsequent submissions. We will ask the Inspector to pay close regard to our clients' previous representations, including the detailed and site-specific Green Belt assessment undertaken Amec Foster Wheeler (Wood) which explains why reliance cannot be placed on the Council's own Green Belt assessment work and demonstrates why the land to the south of the A414 can be logically and justifiably released.

Importantly in respect of the release of Green Belt land and the settlement strategy we note that whilst in the MIQs the Inspector questions whether our client's site should be seen as an alternative to land at Vicarage Lane we say it should not – it should be seen as an additional source of delivery that, together with the proposed Vicarage Lane allocation, will provide the type and scale of facilities that are needed to ensure that sustainable growth takes place.

Concluding Remarks

No doubt previous under-delivery is due to the absence of identified sites for development in this highly-constrained District (which is 94% Proportion of Local Authority land area covered by Green Belt, National Parks, Areas of Outstanding Natural Beauty or Sites of Special Scientific Interest according to the *Government Consultation – Planning for the right homes in the right places housing need consultation data table published 14 September 2017*).

Whilst it is understandable that the Council has taken a sequential approach to the selection of development sites it is likely significant additional numbers cannot be added to the growth of Harlow lest the delivery rate be impacted further; there will only be a certain number of dwellings that the market can deliver in any one year.

It is clear that there are not sufficient opportunities in the urban areas to accommodate growth and that some of the opportunities that have been identified are being strongly opposed by local communities.

The prospect then is that the outward growth of other settlements must be contemplated and because of the constrained nature of the District this is inevitably going to include Green Belt land.

Given the objectively-assessed need and bearing in mind previous significant under-delivery it has to be accepted that larger sites will have to deliver the majority and that inevitably there will be no 'quick wins'. However, it is now the time for very serious consideration to be given to those sites which are considered deliverable (meaning that development can be delivered within the next five years).

Why North Weald Park is an Appropriate Location for Development

EFDC acknowledges that there is a problem in delivering housing in the short-term, and that this could be increased by identifying new deliverable sites and introducing new policies within the Plan. However, it is stated within the *Housing Implementation Strategy Update: Discussion Paper (dated 12 December 2018)* that:

"This option would require a significant amount of new evidence and public consultation to be carried out to justify the quantum and location of any proposed new allocations. This would significantly delay the Local Plan process, leaving the district without an up-to-date Local Plan for a longer period, extending the shortfall and delaying the delivery of housing allocations in the Plan."

Therefore, the Council considers it to be neither realistic nor appropriate to attempt to increase short term housing supply through further allocations. We have previously made representations on behalf of our client relating to the Council's assessment of the release of the Green Belt, in which we highlighted that the Council has not adopted a consistent approach in across all sites, particularly with regard to the changing of the extent of the parcels for assessment.

In the case of North Weald Bassett, the newly-defined green belt boundaries are unlikely to be permanent in the long-term and capable of enduring beyond the plan period (**Paragraph 136** and **Paragraph 139(e)** of the NPPF). The plan will need to be reviewed within five years (**Paragraph 33** of the NPPF) and with the inevitable application of an updated (and increased) objectively-assessed need calculation for the District, the next review will require the release of more green belt land. In this context, it is not clear why the North Weald Bassett's proposed northern boundary stops at Vicarage Lane West, because:

- (i) there is existing built development to the north of Vicarage Lane West; and
- (ii) the A414 forms a clearly-defined and permanent edge (NPPF, paragraph 139 (f)) which allows for the allocation of the former North Weald Golf course which is eminently deliverable.

Given that land to the north of the existing North Weald Bassett settlement is the preferred direction of growth in the North Weald Bassett Masterplan and the Council's sequential assessment, it would be sensible to make provision for additional long-term growth in this location – including upwards of 1,500 dwellings, as per the Council's previous preferred strategy for distributing growth and a sustainable amount of growth for the village.

With regards to the current planning application, Quinn Estates and Redrow have engaged at the early stages of the planning process and entered into a planning performance agreement with the Council. The proposed scheme has already been through one Quality Review Panel and a second Panel is scheduled in the coming months. Revisions are being made to the application scheme masterplan so that the only uses to the north of the A414 is sports pitches and a large country park. All built development, including the primary school, will be sited to the south of the A414.

The current planning application has received a conditional non-objection from North Weald Parish Council, a very unusual scenario for a scheme of this scale on Green Belt land and, in our opinion, reflective of local support for the scheme and the package of benefits that would be part and parcel of this development. Furthermore we note the several hundred letters of public support for the scheme received throughout the consultation period.

The current planning application can make a timely contribution to immediate housing need and is preferable to other locations due to issues with EFDC's allocated sites as discussed above. The site is an appropriate location for development because:

- it is located within close proximity to the existing highways network and existing public transport services;
- it will deliver a significant package of public transport and highways improvements as part of the proposed development;
- it will deliver bespoke new educational and sporting facilities to respond to the local need for such community facilities and deliver a truly sustainable development; and
- it will enable transformational transport infrastructure improvements to be delivered including strategic improvements to Junction 7 of the M25 and allowances have been made to fund these in the applicant's section 106 package.

Montagu Evans LLP
24 January 2019

Appendix 1
Evidence of Contract

Howard / H Han
17.22

DATED 12th March 2018

NORTH WEALD GROVE LIMITED, BRADLEY JOSEPH SMITH
AND STACEY VICTORIA SMITH

AND

REDROW HOMES LIMITED

AND

QUINN ESTATES EPPING LIMITED

AGREEMENT
relating to the sale and purchase of land at
the North Weald Golf Club Rayley Lane North Weald
Epping Essex CM16 6AR

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Appendix 2
Letter from Alex Stark, Redrow

Ms Louise Phillips
c/o Louise St John Howe
Programme Officer
PO Services
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CO10 3BFY

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24th January 2019

Dear Ms Phillips

Delivering new homes and community infrastructure at North Weald Park, land at the former North Weald Golf Course (Site 19LAD0073)

I write to confirm Redrow's intention to facilitate the accelerated deliver of new homes at North Weald Park. In this letter I set out our anticipated build programme and the build rates which we envisage at this well-located site.

We have a legal contract with the land owners and promoter of this site and a 'live' hybrid application is currently before Epping Forest District Council for determination. We have a Planning Performance Agreement with the Council and our team is working with Officers and the Quality Review Panel to ensure that the final masterplan achieves exceptional standards of place making and delivers a sustainable and successful addition to the built form of North Weald Bassett.

Subject only to the grant of planning permission, our programme envisages being on site and constructing the first phase of new homes in Spring 2020. This initial phase of work will also service the local center, the sports hub and the Primary School site, meaning that essential non-residential infrastructure can be built-out alongside Redrow's new market homes and the 40% affordable houses we are committed to provide. This start date would enable us to complete new homes before the end of 2020. From 2021, we would anticipate an annual build-out of at least 75 dwellings because of the site's excellent location and the range of homes we are looking to offer. The whole site would therefore be complete and functioning as a vibrant addition to North Weald Bassett's community by around 2028.

Redrow and Quinn Estates are being represented at the Hearings by Montagu Evans, and they will be happy to provide further evidence on request during the course of your Examination.

Yours sincerely



Alex Stark
Managing Director

Appendix 3
Media / Objections Relating to Car Park Sites

[Contact Us](#)



Home to Buckhurst Hill Residents' Society

buckhursthillresidents.co.uk



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• Preserving the Heritage • Protecting the Rural Atmosphere

• Improving Local Amenities

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.



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 adopted we believe this could place too much significance on any future attempts to develop this land.



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 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 Queen's 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.

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 McCarthy & Stone 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 McCarthy & Stone 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 McCarthy & Stone 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.



struction of individual houses will affect the setting of the locally listed St Justs in the same way as one reasons given for refusal for building a single large building.



ough approval for a single large building was refused, at least it would have been under single gement; 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 Queen's Road Car Park

[This site is at the east end of Queen's Road, not Lower Queen's 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 Queen's 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 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.

Facebook: If this site is redeveloped, the old Station House at its entrance, a historic local building, should be restored and converted, and not demolished.

Twitter: SP 0813 Lower Queen's Road

During 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 leasehold. 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 Queen's 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 in public display in Loughton. We had to interrogate one of the Council Staff present, who went to a large folder. This is an appalling way to run a public consultation. How are members of the public expected to comment on proposals they are not being shown? We condemn the insensitivity of EFDC towards the existing occupiers of this site.

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 Queen's 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.

Jenn Page Peter Foxton

Chair Vice-Chair

Buckhurst Hill Residents' Society

November 2016

Comments on Local Plan after close of Public Consultation

Since the close of Public Consultation on 12th December 2016, we have become aware of significant additional information about each of the three proposed sites, chiefly contained in Appendix B1.6.4 Results of Stage 3 Capacity and Stage 4 Deliverability Assessments, found in Technical Documents / Site Selection Report attached to the Draft Local Plan on the EFDC website.

<http://eppingforest.consultationonline.co.uk/wp-content/uploads/sites/5/2016/08/Appendix-B1.6.4-Stage-3-Capacity-and-Stage-4-Deliverability-2016-10-25.pdf>

[This is a large document, Buckhurst Hill is on pages 2-11]

We strongly object that this information was not included in the Draft Local Plan itself, and was therefore not available to residents during the Public Consultation.

SR-0176 1 Powell Road

From Appendix B1.6.4



Development should be limited so that it does not extend beyond the existing line of development; this equates to approximately two thirds of the site. Capacity reduced accordingly.



The failure to include this information in the Draft Plan misled ourselves and residents into believing that the homes proposed were small houses. It is now clear that blocks of flats are being proposed.

Since the Plan envisages building on only part of the site, then the Local Plan should propose that Green Belt status should be lifted only on that part.

In any event, this appears to mean that if a Planning Application were to be submitted for the whole site, it would be in breach of the Local Plan.

Since the principle of an existing building line has apparently been accepted, its exact position is open to discussion. To us, the line of the rear garden of St Justs would be appropriate, and this implies the area for development would be approximately one half, not two thirds.

The Appendix does not say what should happen to the undeveloped part, but the logical conclusion, as it should remain Green Belt, would be to enlarge the Linder's Field Nature Reserve. This donation should be a condition of approval of any planning application.

It has already been established that any development must not adversely affect the setting of St Justs. That infers that approval for even 20 flats would be refused. Even if the site remains in the Local Plan therefore, it may yield just 6 houses say, not 30 flats.

It is regrettable that this limitation was not in the Local Plan itself; it might have avoided some of the adverse comments.

We do however ask if the landowner has consented to the continued inclusion of the site in the Local Plan, given that EFDC are proposing that a significant portion remain undeveloped in perpetuity.

- *The Council's SLAA suggests that there is a restrictive covenant associated with the site. However, given the age of this restriction the site promoter is of the view that it may be unenforceable and therefore would not constrain development.*

What is the covenant referred to, and if EFDC are aware of it, why was it not referred to when the McCarthy & Stone Application was assessed. Was its existence deliberately suppressed by the Owner, Applicant, and EFDC? What is the opinion of EFDC's legal advisers?

SR-0225 Queen's Road Car Park

From Appendix B1.6.4

- *London Underground parking could be re-provided through basement parking*
- *Car park sites were generally identified in the Settlement Capacity Study as being suitable for higher densities Adjustment +50%*

We reaffirm our view that design and construction difficulties make this concept unviable. A basement could not in any case provide the same number of spaces as currently, so that parking at ground level would be required, as would the additional 44 spaces for the proposed flats. The management of an underground car park would surely require a continuous 24-hour security presence.

SR-0813 Lower Queen's Road

From Appendix B1.6.4

- *Proposal to redevelop existing medium density housing site would require an uplift in density above the baseline. Site capable to accommodating significantly higher density.*



Number of existing flats 24, net capacity another 11

Site is in single ownership

There are existing leases on the site which end within 5-10 years.



Epping Forest District Council, the freehold owners of the site, confirmed that there are no known restrictions on the site.

Site expected to be available between 2021 and 2025

- *Site is being actively marketed for development or enquiries have been received from a developer*

This page of the Appendix is that which we were shown at the Consultation in Loughton, (after asking) and which we have now been able to study more closely.

It is a clear statement that both blocks on the site will be considered for redevelopment.

It is astonishing that EFDC, as freehold owner, is not aware that some flats are held long-leasehold.

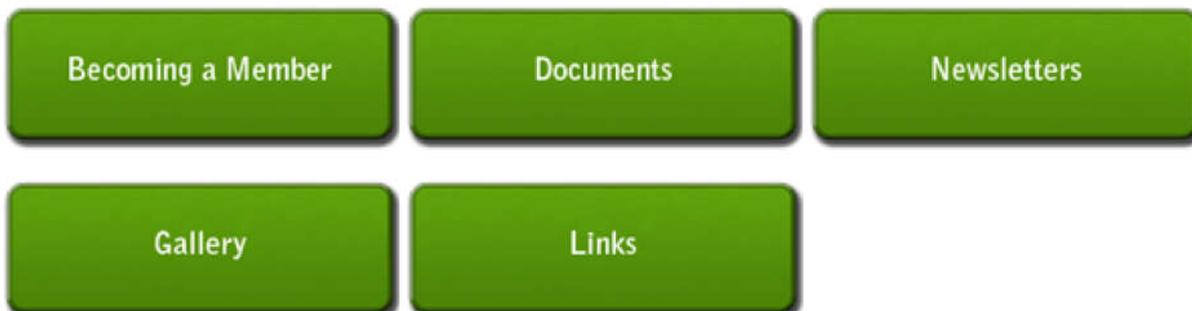
We repeat our view that the failure of EFDC to consult with existing residents and businesses is reprehensible.

Conclusion

We have now read the responses from Buckhurst Hill Parish Council, Loughton Town Council, and the Theydon Bois Action Group. Each makes distinct criticisms of the Local Plan. But they all have in common that their comments are based on the Draft Local Plan itself. As we have found out, there are significant details in the various appendices, which in some cases materially modify the sense of what is written in the Plan itself.

To us, these differences are the result of at best incompetence and effectively invalidate the public consultation on the Draft Plan. If and when Councillors are asked to approve the Plan, will they be approving the Draft Plan alone, or the Draft Plan together with its Appendices? This would materially affect consideration of future Planning Applications, in Buckhurst Hill of at least the sites at Lower Queen's Road and Powell Road.

Taken together, the overwhelming criticisms of the Draft Local Plan and the way in which the Public Consultation was conducted, lead us to conclude that this version should be withdrawn, rewritten, and properly republished for a further consultation.



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Station car parks are among more than 300 plots of land being eyed as potential development sites, according to a new document set to go before the council.

Epping Forest District Council has commissioned consultants Nathaniel Litchfield and Partners, which has predicted that 16,200 more people will live in the district by 2031, to assess possible sites for new homes.

The latest table of possible sites, which could provide a total of 1,200 homes under current policy or 83,000 including sites in the Green Belt, has now been released.

It lists space for 240 homes on the car park of Debden Tube station, 160 at Loughton, 220 at Epping and more than 40 at Theydon Bois, which are classed as “available”, “achievable” and “deliverable” plots by the consultants.

The table has been published after the firm was criticised for releasing an unclear map of possible development sites in April.

Land listed also includes space for 5,000 homes, as well as employment and leisure, in a 2,000 acre sweep of land between the north side of Epping and Thornwood Common, next to the M25.

Another site mentioned is a plot of land south of Vicarage Lane, Chigwell, with space for 1,150 homes, although the firm has noted that both these sites are in the Green Belt, so the council would need to change its policy for development to take place.

The earmarking of station car parks as possible housing estates has alarmed people whose streets are already clogged with commuters’ cars.

Barry Johnston, 64, of Torrington Drive in Debden, said: “If they redevelop the car park, where are all those cars going to go?”

“If they’re considering it and the council can make money, guess what they’re going to do?”

Michelle Duncan, 40, of Colson Road, also in Debden, said: “In the whole area, ours is the only station that does not have parking restrictions around it.

“There are already people down here with young children who can’t park anywhere near home because of the commuters. This would make it even worse.”

The council is due to launch a public consultation on its local plan, which the list of sites is expected to form part of, on July 30.

A spokeswoman said the aim of the plan was to provide a “prosperous district with jobs and homes for local people” and where “the Green Belt is protected.”

Richard Bassett, the district council's planning portfolio holder, said 6,200 families were on its housing waiting list.

"Compared to many other places, the net effects of migration in this District are relatively minor," he added. "But the population of Epping Forest is also getting older.

"We are living longer and in smaller family units. More people are living alone, driving up demand for more homes."

The council is expected to allow the proposals to go forward for public consultation at a meeting on Monday (July 2).

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News

30th September 2016

Residents slam 'mad' proposals to build on Epping Forest Tube car parks

By Joseph Flaig



Epping Underground station currently has the biggest car park on the network



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Commuters and residents have slammed "mad" proposals to potentially build hundreds of homes on Underground station car parks.

Under the draft Local Plan for Epping Forest, which highlights parcels of land which could be developed up to 2033, five Tube car parks in the district could see 444 new homes.

Debden could hold approximately 193, Loughton 114, Theydon Bois 29 on one side of the tracks and 19 on the other and Epping – the largest public car park on the network – 89.

TRENDING



[Local Plan: Here is where all the new homes in Epping will be built](#)



[EPPING: Tyres slashed in parking row](#)





Peter Mitchell, 42, commutes into London from Fyfield and parks in Epping.

He said: "The car park is full every morning by about 10 to eight.

"The best part of 600 cars – where are they going to go?

"You're not going to stop people coming."

People have queued up online to criticise the proposals ahead of a public consultation planned for the end of October.

Commenting on an Epping Forest Guardian story, user Quiet Bat People said it would be "madness" to build over Tube car parks while Jay Bee said: "Epping station is already a nightmare; with housing where the car park currently is no one will be able to get in or out of Station Road, rendering the station unusable!"

District planning councillor John Philip said the draft Local Plan includes details of how the idea could work, as well as detailed plans for extra infrastructure projects.

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He said new housing at stations could have underground car parks which would still be publicly accessible.

"The aim is to have car parks with the same number of spaces, I am not looking for a reduction in car parking," he said.

Despite public criticism of proposals to build thousands of homes in the district, he said the Local Plan is needed to avoid central government bypassing the council, effectively handing free rein to developers.

"Legislation is very clear that to have a sound local plan, you have to meet your objectively assessed housing need... people are living longer and more people are living in smaller households, either that is the way they choose or their partner dies.

"All that drives an additional requirement to the housing we need."

Cllr Philip also said more affordable housing is needed in Epping Forest to help people cope with low average wage levels compared to house prices.

He encouraged people to take part in the upcoming consultation, and urged those who respond to include as much detail and evidence as possible.

"We have a degree of capability to change things around as a result of the consultation.

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By Emily Roberts

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Appendix 4
Photographs of Epping Car Parks

4.1 Epping Station Car Park - Ref. EPP.R3







4.2 Bakers Lane Car Park - Ref. EPP.R7







4.3 Cottis Lane Car Park – Ref. EPP.R6







Appendix 5
Photographs of Agricultural Land











Photograph of the South Epping Masterplan site taken from the M25



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