

**IN THE MATTER OF THE EXAMINATION OF EPPING FOREST
DISTRICT LOCAL PLAN 2011-2033**

MATTER 15: PLACES

ISSUE 2: POLICY P5 BUCKHURST HILL

**PRE-HEARING STATEMENT MADE BY COUNCILLOR STEVEN
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INTRODUCTION

1. Buckhurst Hill is a large village situated between the town of Loughton and the border of Greater London. Epping Forest runs through the parish of Buckhurst Hill, mainly on the western side. It is the most densely populated town or village in Epping Forest. Never the less the submitted draft Local Plan proposes 3 sites with a total allocation of 87 dwellings, 31 at BUCK.R1, 41 at BUCK.R2 and 15 with retail floor space at BUCK.R3.
2. For the reasons set out in my regulation 19 representation I argue that the allocation for Buckhurst Hill to be unsound. The total for Buckhurst Hill is 0.8% of the 11,400 proposed for Epping Forest and so is immaterial to the plan itself. Further they are unnecessary given the windfall development in the period of the plan so far (2014/15-11, 2015-16-22, 2016-17-16) and what is likely to be achieved in Buckhurst Hill and in the District as a whole which the District Council have underestimated. They are not realistically deliverable but if they were would cause unnecessary harm to Buckhurst Hill and those who live and work here. I am therefore asking they be removed from the plan.

BUCK.R1 (1 POWELL ROAD)

Can the significance of the locally listed 1 Powell Road be conserved in light of the scale of the development proposed within its grounds?

3. 1 Powell Road (Known as St Just) is a significant Locally Listed Building once home to the important Linder Family until the 1970s. It was owned by Charles Linder, an important figure in the history of Buckhurst Hill and home to his son, Leslie Linder, who decoded the diaries of Beatrix Potter. The house and garden abut Linder's Field

Councillor Steven Neville (19OTH0069) Matter 15 Statement

Local Nature Reserve (which was once part of the grounds but was given to the people of Buckhurst Hill by Charles Linder)

4. In allowing the scale of the development proposed it would sever the link between St Just and Linder's Field Local Nature Reserve and would diminish St Just's dominant elevated position and detract from its significant garden setting.

What effect would the development have upon the purposes of the Green Belt?

5. BUCK.R1 was subject to planning application EPF/3021/15 which refused permission on the grounds that it was not limited infill in a village within the greenbelt and would cause substantial harm to the openness of the green belt. Thus the development was not one of exceptional circumstances in the green belt. It was thus contrary to the aims of the Green Belt (paragraph 79 and 80 of NPPF 2012). Nothing has changed since that decision. The site sits between Linder's Field Local Nature Reserve and a village green. The reserve is home to all manner of fauna. I am deeply concerned about the link between these 2 sites and the effect on the wildlife of the area. Any development will not enhance but degrade the ecological value of the site. There is likely not to be a net gain as stated in policy DM1. I note the requirement in Appendix 6 that 'careful design and layout, where appropriate, incorporate an ecological buffer to protect ecological sites' However this wholly inadequate to the task. Thus it will be harmful to the Green Belts aims and purposes. It is also unnecessary as Buckhurst Hill's allocation can be met by windfall housing (as can sites BUCK.R2 and BUCK.R3). The site does not meet the criteria for exceptional circumstances from paragraph 83 of the NPPF 2012.

Has the capacity for windfall sites been accurately estimated?

6. The Local Plan makes allowance for 35 windfall properties per year from 2013 onward (an 11 year period). However as stated previously in this statement and my Regulation 19 representations, that figure is pointedly low and thus unsound; as a result windfall sites are virtually ignored in the allocation of units in the Local Plan.
7. Given the statistics already produced which show that Buckhurst Hill could deliver more than 10 windfall dwellings each year and undoubtedly more than 35 a year across the whole of Epping Forest. This would mean the current allocations in the Local Plan for Buckhurst Hill are unnecessary as windfall developments will more than help deliver on the stated numbers needed
8. Additionally this approach to windfall sites would better reflect what is going on in the District and thus lead to more general amendments, and help to recognize the impact of such developments on the local infrastructure.

Should the development requirements in Appendix 6 require a new defensible Green Belt boundary along the northern boundary of the site as well as the eastern boundary?

9. It remains unclear to me why Epping Forest District Council omitted the northern edge of the site. However if this site remains an allocated site it should have a clear defined and defensible boundary as para 85 of the NPPF states. The northern boundary remains vulnerable and thus needs to be included to protect from future development.

BUCK.R2 (QUEENS ROAD LOWER CAR PARK)

Can the required number of spaces for London Underground customers be provided?

10. This site is used by commuters who use the car park due to the fact that Buckhurst Hill Underground Station is in Zone 5 compared to Loughton and Debden being in Zone 6, thus making trains costs cheaper. It is also used, and this is important, by shoppers in Queens Road. The car park is therefore heavily used currently. The proposal of 41 units with ground floor shop space presents significant challenges. Whilst it is welcome that appendix 6 development requirements recognize the need to provide limited parking for residents, visitors and blue badge holders I believe the proposals bring significant challenges short term and long term.
11. In the short term we would have the problem of displacement of cars into local roads. Princes Road, Briar Close, Victoria Road, Queens Road and Forest Edge all have varying parking restrictions including permit parking to counter commuter parking which is already a problem in the area. It will have a detrimental effect on the shops as less parking will be available.
12. In the long term due to insufficient parking for the proposed dwellings it is likely to make parking in local roads even more challenging than at present.
13. In addition to fulfill the 41 units and ground floor retail space plus meet existing parking provision the development would have to a multi story parking or underground parking which present further challenges. The former would result in a building that most likely would dwarf many residential properties near it which are mainly two storey or bungalow properties. The latter would entail significant cost to the developer.

Will the scheme be financially viable in light of the contributions required?

14. No. Given the small size of the site, the constraints on the site being located between residential properties and the Central Line and the challenges of delivering the parking provision of any proposal the costs of construction will likely be high and thus viability is very questionable.

Will it be viable to provide affordable housing in line with Policy H2 of the Plan?

15. As Policy H2 states in developments of 11 or more dwellings a minimum of 40% or more be affordable. In this case it would mean approximately 16 minimum of the 41 dwellings would need to be affordable. Whilst I would welcome any new affordable housing I cannot envisage how this is deliverable due to the other viability issues and related costs this development may entail.

BUCK.R3 (LOWER QUEENS ROAD STORES)

What is the nature of the existing development upon this site and is it genuinely available/developable in light of existing uses, including residential?

16. The Western part of the site is a 2 storey 1960's building, built by the predecessor of Epping Forest District Council, who remain the freeholder of the site, of 4 ground floor shops units (a convenience store, launderette, café and cycle store) and 4 residential flats. On the southern flank of the site are 20 flats in a 3 storey building. In front of the buildings is limited but well used parking facilities. In addition there is an underpass under the flats and between the shops of the

Councillor Steven Neville (19OTH0069) Matter 15 Statement

western building which leads to a subway which in turn leads to the shops in Queens Road and the step free access of Buckhurst Hill Underground Station.

17. I argue that given the current residential and commercial uses of this it is not truly available/deliverable
- A) If development went ahead it would significant harm to residents and existing shopkeepers due to disruption and displacement.
 - B) The loss of local shops would a negative impact on local residents as a whole. Many of these residents live in retirement or sheltered accommodation and the shops provide essential services to these locals. Families on low incomes also use the Launderette as they cannot afford their own washing machine. Restaurants also use this as well to do service washes. Any development would present serious issues for the elderly, those with mobility problems and those on low incomes.
 - C) 15 extra dwellings and extra shop space would require extra parking. As it is parking presents significant challenges on the site currently and any extra development will cause the same harms as BUCK.R2.

What arrangements are necessary to relocate current shopkeepers and residents and would this represent fair treatment?

18. Any relocation would need to be close for shopkeepers to minimize the impact on the existing customer base they have built up. The convenience store could well be moved to Queens Road where it will be competing with Waitrose and others and thus will face much heavier competition and may well not survive. Where it is currently located means it is better placed to operate in that there is little competition on the east side of Buckhurst Hill where it does well. The Launderette and Cycle Shops have built long standing businesses which are well used and any move will cause major upheaval. It doubtful whether a move would not cause major disruption and cost

Councillor Steven Neville (19OTH0069) Matter 15 Statement

to them. The Café (IG9) is a popular café that has created a niche for itself on the east side of Buckhurst Hill in that there are no other cafes. Move it to Queens Road which is heavily populated by cafes and it will find it much more difficult to survive. Being a little distance away from the main shopping area can aid a business in surviving in the current difficult economic circumstances.

19. In terms of the flats a number of residents are well established into the local community and some are old or elderly. Any move would be a major upheaval. Many of the flats have long term leases. This too brings with it challenges for any developer.
20. It is noted that any proposed development is not targeted for delivery until 2028/29 and has caused considerable and unnecessary worry and concern for occupiers and shop owners alike.
21. It is significant that BUCK.R3 has caused a great of concern and anger from residents and shop owners on site. As yet I have not seen anything from Epping Forest District Council to alleviate these concerns.
22. I ask will the existing flat owners/occupiers be given first preference when it comes to the net gain of 15 extra units? The original flats were council flats and as such were for low income families. There is no indication that these flats will be affordable or that existing owners/occupiers will get first preference after development.
23. I therefore greatly doubt that any arrangements will be fair treatment.

Is there any reason to consider that this allocation might not be financially viable?

24. Given the allocation for the site will require considerable redevelopment for little gain, especially if adequate parking is to be

Councillor Steven Neville (19OTH0069) Matter 15 Statement

provided it is doubtful this can be achieved without a high rise development. Any development with only a small gain in units will be outweighed by the disruption and harm caused to existing business' and residents' on site as well as the wider community.

Should the development requirement in respect of design seek to avoid high rise development?

25. Most buildings in the area are 2 storeys with a maximum of 4 storeys at The Atrium. The site itself contains 2 to 3 storey buildings. Anything above 4 storeys would be out of keeping with the area. If they alternatively took up the whole site by projecting eastward with a development it would dominate the site.