

# Buckhurst Hill Parish Council

Response to the draft Local Plan Consultation October 31<sup>st</sup> = December 12<sup>th</sup>, 2016.

## Preface.

Buckhurst Hill Parish Council has endeavoured to respond using the format used in the questionnaire provided by Epping Forest District Council. However, we found that this was too restrictive and not conducive to the Parish Council answering the questions in quite the way it would have preferred. Consequently some of our headings may differ from those used in the draft Local Plan questionnaire document and with a number of the issues raised, this inevitably means that there are cross references in places.

## Introduction.

With a population just under 12,000, Buckhurst Hill is a large village settlement in the southwest corner of Essex, adjacent to London with half of its land being taken up by Epping Forest and other open spaces, ancient woodland etc.

The earliest reference to Buckhurst Hill was in 1135 with a transfer of the Manor of Buckhurst Hill by William de Montfitchet to the Abbey of Stratford. Buckhurst Hill developed gradually but in 1856 the Eastern Counties Railway Company arrived with a line from Stratford to Loughton. This brought a huge change in housing and infrastructure.

Buckhurst Hill, on the doorstep of the ancient Epping Forest, is a desirable location across the age spectrum for many reasons. It has excellent access to public transport via the Buckhurst Hill Underground Station on the Central Line, Chingford-Liverpool Street British Rail Line nearby, buses and motorways. The main shopping area is centred on Queens Road but with other smaller shopping areas in Station Way and Loughton Way.

## Question 1. – Strongly agree.

The Buckhurst Hill Parish Council would agree with the overall vision of Epping Forest District Council (EFDC) in trying to ensure an enhanced quality of life for its residents going forward and its aspirations in wanting to provide new homes, jobs etc., whilst at the same time protecting the Green Belt (including Epping Forest itself).

We also appreciate that EFDC have taken cognisance of comments and concerns raised by both ourselves and other Parish/Town Councils in relation to developments on Green Belt Land.

Wherever possible the Parish Council has tried to provide a positive response to the consultation, whilst also reflecting concerns of local residents and the Parish Council itself.

## Question 2. – Disagree.

Whilst, Buckhurst Hill Parish Council would fully support the proposed developments around Harlow and the main settlements in principle, we do also have grave concerns over the magnitude and consequential impacts of these proposals for some of these settlements, as well as those involving Buckhurst Hill.

For all of the proposed sites selected for development, increased and improved “infrastructure” will be key and the draft plan is noticeably light and vague on the how this increased demand will be met.

## Question 3. – Agree

The Buckhurst Hill Parish Council agree that the proposed sites around Harlow offer the best options for large scale developments and we also see this as the natural extension of Harlow.

However, Draft Policy SP3A refers to the "potential relocation of the Princes Alexandra Hospital". This is a matter of concern to the Parish Council as this is the primary hospital serving Buckhurst Hill. With the currently proposed reduction and/or withdrawal of existing bus services to Harlow, residents without access to a car are already experiencing problems in getting to and from the Princess Alexandra Hospital.

If this relocation were to come about, then an early decision would need to be made as to where it is to be relocated and that site's accessibility by Public Transport; as well as transitional arrangements for healthcare whilst the relocation takes place.

**Question 4. – Yes.**

The Buckhurst Hill Parish Council generally agrees with the vision but have concerns over the District Council's ability to protect and encourage retail use. Particular concerns regarding change of use from office space over shops to residential.

**Question 5. – Agree.**

The Buckhurst Hill Parish Council would broadly agree but have concerns about the District Council's ability to meet their laudable aspirations, given recent trends in the demise of retail, not only in Buckhurst Hill but across the District and wider afield. Smaller retailers in particular seem to be suffering with the current level of business rates and the competitive disadvantage that this presents when they are up against the Waitroses' of this world.

**Question 6. – No, Strongly Disagree.**

The Vision for Buckhurst Hill is a valid statement which adequately covers our aspirations for the future. However, we do not consider that the proposed development sites have been sufficiently well researched. Had they been so, we believe that the inherent problems within each of them would have been identified, leading to them being discounted. We also note that the 2015 SHMA report states that "whilst the evidence states that it is reasonable the FHMA consists of East Herts, Epping Forest, Harlow and Uttlesford, the more important issue will be for .....Epping Forest to maintain dialogue with Broxbourne as well as Chelmsford and other Essex Authorities, as well as each other and the boroughs to the north and east of London as well as the Mayor of London". There certainly seems to be a lack of reference or evidence that neighbouring London Boroughs or the Mayor of London have been consulted on any part of this draft plan. We have no idea what input, if any, they have had. With significant proposals for development in Hainault and Aldborough contained within the Local Plan for Redbridge, there are obvious "knock-on" implications for Buckhurst Hill, especially with regards to pressure on public transport (especially the Central Line) and education (pressure on school places, particularly West Hatch High School).

The July 2012 Issues and Options Report identified that Buckhurst Hill was "heavily constrained" as a direct consequence of having Epping Forest itself on its north-west boundary; remnants of the Ancient Hainault Forest to the south and south-east; the flood plain of the river Roding to the east and urban areas of the London Boroughs of Walthamstow and Redbridge to the west and south-west. As a consequence of this it was considered that Buckhurst Hill could not sustain more than 53 homes and was therefore "not a reasonable option" for developments.

We share the observation that the proposed volume and density of development would be out of character with the already over-crowded area; we therefore disagree with the housing provision in Chapter 5 - Draft Policy Para 5.90 of 90 homes. It might be argued by some that 90 homes is not a large number but it represents an almost 75% increase on the 2012 figure of a **maximum** of 53 homes. In the greater realm this may not be a significant number BUT in terms of the local Buckhurst Hill context, this an enormous amount to be absorbed by the already creaking local infrastructure. Currently, there aren't enough school spaces for local children, an acknowledged deficit in GP and Dental services, parking at bursting point and public transport services under threat of reduction, removal or no increases (a reduction in services in real terms).

We would argue that a more realistic figure might be the originally stated 53. Indeed, with our experience of development in this Parish we feel that 53 extra homes (however many bedrooms) will be developed over the next 30 years by the continuing tendency for developing flats on sites with large houses; the demolition of single houses and building at least two smaller houses and also the infilling to houses with side gardens. Additionally, the failure to consider "windfall sites" in the draft Local Plan figures means, in real terms, that Buckhurst Hill is being expected to accommodate an even greater number than either 53 or 90 suggest.

Whilst we acknowledge that the outcome of the recent EU referendum could not have been predicted during the compilation of this draft report, and in turn what that would mean for Epping Forest; but there clearly now needs to be some analysis as to the impact of Brexit on the SCHMA estimations and a further revision of the overall number of homes required.

#### **Residential sites:-**

Notwithstanding the above-mentioned, we believe that there are serious challenges to each of the sites that are currently listed.

**Site SR-0813 (Stores at Lower Queens Road)** would significantly impact shops that serve the local community and it is not an appropriate site. We have been informed by planners that the intention is that shops would be part of any future overall development. However, no matter how carefully any development is programmed there will still be period of time when there will be no shops open. There is a significant amount of Sheltered Accommodation, Retirement Flats/Housing etc. accumulated in the immediate vicinity and the shops (the launderette and convenience store particularly) provide an essential service to the locality. Even the shortest closure would have a significant negative impact on a large number of senior citizens and less physically mobile residents.

Similarly, although we understand that EFDC will require any future developer to ensure that the subway access to Queens Road from Albert Road be maintained, any closure, even a temporary one, will have significant negative impact particularly for senior citizens and the less physically mobile in our community. They will be left with a long walk along Albert Road and down Victoria Road to access the closest shops. (A journey, partly uphill, of about 1/3 mile each way, which is a long distance for an elderly/ less physically able person). They then may well have a difficult walk up Queens Road to access some shops. It seems that little will be gained and a lot could be made worse. We know from residents comments, that there is local distrust amongst residents, despite assurances, that both these shops and the subway will be closed never to re-open.

As just stated, the identification of this site, in common with the other two sites, has caused considerable disquiet amongst residents; a great many of whom knew nothing of the District Council's interest in this site. Business owners and occupants of the affected properties are already expressing their worries and seeking assurances over the arrangements for their relocation.

The surrounding area already has significant parking capacity problems and this development could considerably worsen that situation. Additionally, residents have expressed their worries that additional families will increase the pressure on already oversubscribed local schools, GP surgeries etc.

We have significant concerns with the assertion for **SR-0225** (Queens Road – Lower Car Park) that parking will be retained. It is well-known that a number of commuters from outside Buckhurst Hill use this car park because of its proximity to Buckhurst Hill Underground Station. This is in no small measure because the station lies within TFL Zone 5; whereas Loughton and beyond are TFL Zone 6 with higher fares. It seems almost impossible that the proposed 44 houses could be built on the site without impacting severely on the parking provision. EFDC Planners state that there would be a requirement on any developer to ensure no nett loss of parking spaces but this would be difficult to achieve without an expensive multi-story solution or a subterranean solution which would be even costlier. The only other alternative, we are advised by planners, is that any developer would have to provide an alternative car parking site. No guarantees that this would have to be within a short distance of the station or in Buckhurst Hill even. This leads to further concerns that any developer would seek exemption from the requirement to provide an affordable housing element. It is also not clear from the statement “no nett loss” as to whether this is the current 103 spaces only or 147 (103 + 44). Either way it is likely the combination of these factors must add significantly to the congestion at the adjoining pinch-point junction of Queens Road, Princes Road and Victoria Road. This will simply happen by virtue of increasing the number of cars in the area.

There is also concern of what happens to the temporary displacement of 100 plus cars during construction and the impact on adjoining streets whilst the works are being carried out. Traffic congestion is an enormous issue for the whole of Buckhurst Hill; with a number of acknowledged pinch-points. Albert Road, especially the junction with Palmerston Rd; Loughton Way and Roding Lane area, are of particular concern. Similarly Queens Road, Princes Road and Victoria Road. All of these are specifically referred to in the Local Plan AND adjoin the two proposed developments SR-0225 and SR-0813.

The semi-rural character of Buckhurst Hill should be protected including the separation between Buckhurst Hill and Loughton. As mentioned previously, we will strongly oppose any alteration to the existing Green Belt and consequently most strongly object to the inclusion of **SR-0176 (St. Just, Powell Road)**, which is designated as Green Belt. This has been part of all elected members manifestos and should not be allowed. Notwithstanding, this parcel forms part of a buffer that prevents Buckhurst Hill and Loughton from merging into each other. The gap being measured in just hundreds of metres in places. It also literally adjoins the “Linders Field” Local Nature Reserve and local residents and the Parish Council have grave concerns on the adverse impact any development here would have on the flora and fauna of the Nature Reserve.

Linder's Field is more than just a field. It is a mixture of ancient woodland, wildflower meadow, scrub, grassland and ponds. The small ponds are home to frogs, toads and newts, the hedgerows are good for the foraging bats and in the summer the meadow is a draw for rare insects. Linder's Field is a remnant of a once much larger ancient woodland called Pluckett's Wood and contains a great number of ancient woodland indicator species, including wild service trees to name just one. The combination of hedgerows, scrub and woodland on the reserve provide an important corridor for wildlife to travel safely between the pockets of green space in the Buckhurst Hill area. Linder's Field got its name from Charles Linder who used to own the site and whose family had strong connections to the famous children's novelist Beatrix Potter. He allowed use of the “field” by locals as a venue for sports days

and summer fetes. Hence its' particular place in the hearts of residents and its importance within the wider local community.

Additionally, this parcel is immediately adjacent to the Locally Listed building of special architectural/historic interest, called St. Just. The proposed development would wrap around the site and as a consequence would appear inappropriately dominant to St. Just and thereby detract from its spacious setting. The resulting harm to the setting of the building is likely to cause, without proper justification, significant harm to its value as a non-designated heritage asset. This is consistent with the NPPF. Any development would also interrupt the historically linked assets of St. Just and Linders Field.

This site would present the same infrastructure issues, especially schools and traffic congestion as the other sites and these will be expanded elsewhere in this response.

It is noted that each of the three sites proposed in Buckhurst Hill have topographical constraints that may preclude development.

In recent days the Parish Council has been asked to provide comments on a Pre-Application proposal for 18 homes on the current Victoria House site (Victoria Road, Buckhurst Hill). Whilst we would be the first to acknowledge that the full planning process would need to be followed AND would not wish to rush to any pre-judgement, this particular proposal at first sight certainly seems to be much more viable than any of the three identified sites contained within the Plan. On this basis we would request that this site be considered as counting towards the ~53/90 homes figure that EFDC have put forward for Buckhurst Hill.

The focus on urban brownfield land, including infilling, seems well advised but should ensure buildings of historical relevance are protected and that existing parking provision is maintained. Local residents should not lose existing amenities. However St. Just, as mentioned above, one of the proposed sites for Buckhurst Hill is currently designated as Green Belt, which obviously falls outside of brownfield.

**Traveller Accommodation:**- We note that no provision for Traveller Accommodation is proposed for Buckhurst Hill.

**Employment Sites:**- The Parish Council would broadly support the proposed approach with regards to draft Policy E1. However, in regards to Queens Road, there have been many examples of current office accommodation being refurbished as flats, which provides a greater return to the landlord no doubt. There is an acknowledged demand for office space locally, which cannot be satisfied. This creates a scenario whereby businesses and job opportunities are being squeezed out at a time when they are desperately needed. We need a clear policy with teeth that outlines what should be kept as office accommodation and what may not.

**Infrastructure:**- As the most densely developed settlement in Epping Forest District, it is important that the additional infrastructure needs are discussed before any developments on the three listed sites are developed. We agree with the position stated that existing education and healthcare facilities are either at capacity or oversubscribed and this poses an impediment to further development. Infrastructure is expanded upon later in this response.

**District Centre:**- We generally agree with the Local Plan's comments on this topic but would also mention the other areas of retail in the Parish, namely the shops in Station Way, Loughton Way and indeed at the top end of Queens Road. These businesses should equally be encouraged to thrive.

On a more general point EFDC has a local infrastructure delivery plan but this is more generally around aims and not about how they're going to achieve the infrastructure that is needed. A lot of these plans state the need for complimentary infrastructure and recognise that EFDC cannot themselves deliver it and they have to work with partner organisations such as Essex County Council. However, the delivery proposals as a whole are far too vague and lack detail on how they're going to actually go about achieving what needs to be done. There is also mention in this plan of the community infrastructure levy (CIL) something which EFDC has yet to commit to and thus may not be pertinent going forward.

On green infrastructure there are some fine words about enhancing connectivity between sites but there is enough wiggle room for developers to get out of this.

#### **Question 7:- Disagree.**

At this time, the status of the Infrastructure Delivery Plan is that it is not complete (which is accepted by EFDC). As such it has been extremely difficult for the Parish Council to fully consider the adequacy of the planned infrastructure to meet the needs of any proposed development.

The Local Plan appears to have a vague approach with regard to infrastructure with little recognition of problems that residents currently face or the detrimental affect any additional development will present. Infrastructure improvements appear to be totally reliant on other agencies over which Epping Forest District Council has no direct control or authority. It seems unlikely that CIL/S106 agreements on individual sites will provide enough funding to accommodate the necessary improvements to the infrastructure for both existing and new residents.

The Parish Council supports point Draft Policy P6C which states that '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', however would like to see this policy strengthened to make it clear that without the necessary infrastructure, development cannot progress. It is understood through discussions with Planning Officers that a failure to provide the adequate infrastructure is not, in itself, a material reason not to meet with Objectively Assessed Housing Need (suggesting case law on Local Plans is proving this), and the Parish Council would like to express its concern regarding this fact. The Parish Council feels strongly that a failure to adequately provide the appropriate infrastructure will have a serious detrimental affect not only on current residents, but new residents and indeed residents across the District.

Planning Practice Guidance states that 'Where the deliverability of critical infrastructure is uncertain then the plan should address the consequences of this, including possible contingency arrangements and alternative strategies. The detail concerning planned infrastructure provision can be set out in a supporting document such as an infrastructure delivery programme that can be updated regularly. However the key infrastructure requirements on which delivery of the plan depends should be contained in the Local Plan itself (Paragraph: 018 Reference ID: 12-018-20140306)'. At this stage, the Parish Council feels that the Draft Local Plan does not detail the key infrastructure requirements for Buckhurst Hill.

The Infrastructure Delivery Plan sets out the trigger points for various community facilities, including doctors surgeries, sports pitches, primary and secondary schools, etc., however falls short of identifying appropriate locations for such facilities (assumingly due to sites, locations and numbers in terms of development not being agreed at this point). The Parish Council would expect such facilities to be accommodated within areas of land already identified for development, and not to be located onto Green Belt Land following revision of its boundary and adoption of the EFDC Local Plan.

The Infrastructure Policy (D1A) States that "Planning Permission will only be granted for developments where the infrastructure and services agreement .... is already in place or will be provided to an agreed timescale". This is an important statement and must be maintained. We already have two developments in Buckhurst Hill that have been given permission, both without any agreement or statement regarding increases in any infrastructure. As these developments are deemed to be part of our allocation over the period of this Local Plan there must be some doubt that this policy will be adhered to.

The Infrastructure Policy does not take into account that our local primary schools are already at maximum capacity. Children are already being allocated places in schools outside of the Buckhurst Hill/Loughton South FPG area. With the planned increase in the number of families resulting from the proposed developments, potentially another three forms of entry will be needed by 2033. The draft Infrastructure Policy states that "The forecast capacity figures show that the current infrastructure will be under significant pressure to accommodate the growing pupil population". As a consequence another Primary School or a major expansion will be needed to accommodate this extra demand as the forecast does not take into account numbers from the new proposed developments.

With regards to secondary education, we were recently consulted on the expansion of West Hatch High School.; which the Parish Council support. However, there is concern that the main beneficiary of an expanded West Hatch will be children from the London Borough of Redbridge and not Epping Forest/Buckhurst Hill children simply because of the schools proximity to the boundary with Redbridge (and the proposed developments in Hainault and Aldborough).

All of our schools are oversubscribed, including our three independent schools (over four sites) in the Parish. Currently, Buckhurst Hill children are being placed in Primary Schools outside of the Parish, not just at White Bridge (Loughton), which we know is to be expanded but also as far as Limes Farm (Chigwell) and Waltham Abbey due to the lack of school places locally. The catchment areas for both Buckhurst Hill Community Primary and St. Johns (C of E) Primary is today just a 150 yard radius. Additional houses need additional school places, where and how are these going to be provided? The draft Infrastructure Policy makes no provision for the school places needed to meet the demand generated by any new homes. The figures are based solely on the known shortfall currently (ie without any new developments). Similarly, no additional provision appears to have been considered for a subsequent increase in the demand for secondary school places.

Public Transport is being threatened with cuts to bus services throughout the Parish (and across the District). The Underground too has already had cuts in services on the Roding Valley line and Transport for London (TFL) have no current plans to increase capacity on the Central Line, which services Buckhurst Hill and beyond. More houses need additional capacity in the transport system at a time when public transport services are effectively contracting. Where and how is the extra demand going to be met? The consequence being that rather than meet the aspirations of the draft Infrastructure Plan for a shift towards Public Transport, it is quite evident that commuters will turn to their cars and thereby increase pressures on existing roads, increased levels of CO<sub>2</sub> etc etc. Epping Forest District Council's vision for Buckhurst Hill to support non-car based modes of travel is not realistic.

Buckhurst Hill is a commuter village and cannot support employment for the working population therefore many residents need to travel to work. The local bus service has limited destinations and therefore residents need a vehicle to get to their place of work. A large proportion of our residents commute to London with the majority of those using one of the two Central Line stations in the

Parish. It has been stated by Planners that there will be no nett loss of parking spaces at local underground stations if car parks are developed. As already mentioned in an earlier answer, a great many commuters drive in from relatively long distances to Buckhurst Hill, merely to take advantage of the lower zone fares. With the increase in the population of the district, commuter parking would be expected to increase putting additional pressure on parking at all stations including Buckhurst Hill and Roding Valley. Neither is there a solution suggested to solve the problem of commuter parking while these sites are under construction.

Additionally, trains from Epping and beyond are already full to capacity. TFL claim that they cannot increase capacity on the Central Line due to the following: -

- The dimensions of the tunnels prevents an increase in carriage size
- Platform length in Central London prevents the number of carriages being increased
- The signalling system prevents the provision of more frequent trains
- Passengers travel to Epping from further afield to use the tube rather than the more expensive mainline trains
- Development in other areas will increase the demand on the underground service

We are fortunate to have excellent small GP and Dental practices in the area that provide excellent service but they are all significantly oversubscribed. More houses need additional services, where and how are these going to be provided? The Infrastructure Policy is somewhat light as to how this demand will be addressed. The same problem exists with Hospital provision.

#### **Question 8:- Interim Sustainability Appraisal (ISA)**

It is very difficult for the Parish Council to comment on something that is a "work in progress". However, we would like to see regular feedback and consultation on the progress of the ISA.

We would like to see that the ISA is robust enough for EFDC to clearly identify your obligations and will also highlight to you the objectives of other organisations and service providers which your authority might pursue through the plan.

#### **Question 9:- Other Policies.**

##### **Spatial Development Strategy 2011-2033.**

SP2A - As already referred to in answer to question 6, we strongly feel that the number of ~90 new homes for Buckhurst Hill, on top of windfall sites, is too large for the reasons already given. This number should be capped at 53 as stated in the 2012 Issues and Options consultation.

##### **The Visitor Economy**

E4 - Buckhurst Hill is in an excellent position to service tourists from London, Overseas visitors to London and the wider UK. Direct connections to Central London by public transport provide good and speedy access, as well as good links to Stanstead and City airports. There is a Premier Inn in the High Road and other Hotels in the immediate vicinity. Where Bed and Breakfast accommodation is being provided we should ensure that the information is available to Tourist Offices.

We do have concerns that the various modes of transport must be maintained and improved upon if the aspirations of a growing Visitor Economy are to be realised.

##### **Sustainable Transport Choices**

T1A & T1B Concerns that there is insufficient clarity from the draft Infrastructure Plan as to how this would be achieved. Not least because, as has already been indicated, current public transport services are under threat of reduction at a time that current levels of demand are increasing.

### **Habitat protection and improving Biodiversity.**

DM1C to F – All these sections need to be stronger. We cannot see why any development should be permitted if an ecological feature would be adversely affected. We in Buckhurst Hill are surrounded by Ancient Woodland and we are conscious of residents desire to protect our Ancient Woodland and the associated flora and fauna. We also have a limited number of green open spaces which in their own ways are very precious to the community by virtue of their relative scarcity and size. We would want to see some policies with real teeth that would protect these open spaces.

### **Suitable Accessible Natural Green Space and Corridors**

DM4 - We have precious little Green Space in Buckhurst Hill and we are avowed to protect it. Whilst we applaud EFDC's aspirations here, there is precious little to explain how these aspirations would be achieved and how the areas will be protected from development and this is a concern for us. We would like to see more to strengthen this policy up.

We also have concerns about the amount of green open spaces that are being potentially being lost in neighbouring Loughton/Debden and Chigwell. We feel that this will have a significant negative impact on local flora and fauna and may well have a "knock-on" effect on wildlife in Buckhurst Hill.

Similarly, Members are concerned about the visual impact that further development in Luxborough Lane will have on Buckhurst Hill.

### **Designated and undesignated open spaces**

DM6A - Concerns that the standards need to be **VERY** high and robust.

DM6B – We have precious little Green Space left. It is difficult to see where alternative space could be provided. This Plan would not work here in Buckhurst Hill.

### **Heritage Assets**

DM7F - We note the absence of any request for properties to be added to the Local List of Buildings of Architectural / Historical Interest. We feel that it is important for the list to be maintained and consideration also to be given to add suitable buildings to the list. Buckhurst Hill has many fine Victorian buildings and there are many Arts and Crafts or Domestic Revival buildings that currently have no protection. This should be rectified as soon as possible.

### **High Quality Design**

DM9B - We agree in general with the aims of the Policy. However we have concerns relating to the calls for Strategic Masterplans to be prepared and developed for the Strategic Site Allocations. Specifically, our concerns are that this will by-pass the scrutiny required for any new approval and that the Masterplan will in some way lead to an assumption of approval in the future.

DM9J - We are concerned that some recent developments in the Parish broach the intention of Paragraph J (i) where private amenity space has been of meagre proportions and approval has been

given on the basis that open spaces are a short walk away. Every dwelling should have an open and useable amenity space.

DM10A - We agree that minimum space standards should be in place. We also agree that site densities should relate well to surrounding areas. Town cramming does not enhance the area only the pockets of the Developers.

There seems to be a bias towards pastiche mock Tudor or Georgian terraced developments. It is disappointing that sites that could have incorporated good high quality modern design appear to have difficulty getting through the planning process.

### **Waste Recycling Facilities**

DM10 - We agree with the Draft Policy and hope that this will put an end to rows of Wheelie Bins in the frontages of new properties. We would wish to extend this policy to properties seeking an extension so that we can start to remove this blight from our landscape.

### **Subterranean Basement Development and Lightwells.**

DM12 - We generally agree with the Draft Policy but would amend DM12B to remove the word "should", and be replaced by "shall unless there are exceptional circumstances".

### **Finally**

The forward to the draft Local Plan states that "This Plan outlines the necessary infrastructure to support development and good planning of the district'. Regrettably it doesn't, and this has been the most concerning issue for local residents. Many would say that there has been a failure to manage expectations, which has in turn led to residents becoming disillusioned with the entire process.

Given the extreme parking issues that currently prevail across the District but most especially here in Buckhurst Hill, one significant failing of the Local Plan is the non-existence of a "Parking Policy". There are significant parking issues associated with each of the sites here in Buckhurst Hill with no hint within the Plan as to how these issues would be addressed. There is reference to support for non-car based modes of travel but without the proper support of a public transport network this simply is not realistic and "de facto" parking issues will escalate exponentially. There should be a separate Parking Plan that acknowledges the problems and sets out how these would be addressed.

### **In conclusion.**

The Parish Council understands the pressure that Epping Forest District Council is under to deliver a sound plan, however on behalf of its residents it must state that the level of development proposed is simply unacceptable for Buckhurst Hill (and some other areas of the District). The Parish Council respectfully asks that the District Council fully considers the valid arguments as set out in this response, and that these are incorporated into the final Local Plan document.

**Ratified by Buckhurst Hill Parish Council – Full Council Meeting of December 8<sup>th</sup>, 2016.**