

13-15A ALDERTON HILL, LOUGHTON

PLANNING STATEMENT

For

Elysian Loughton Site Limited

November 2018



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0.0 EXECUTIVE SUMMARY

This Planning Statement has been prepared and submitted by DP9 Limited (“DP9”) on behalf of Elysian Loughton Site Limited (the “applicant”) in support of a detailed planning application for full planning permission for the redevelopment of land at 13-15A Alderton Hill, Loughton (the “Site”), within the district of Epping Forest, to deliver a new elderly housing development with integrated care and amenity facilities.

The Site consists of three properties, Nos. 13, 15 and 15A Alderton Hill, comprising residential homes of 2 storeys (plus roof accommodation) and a bungalow. It occupies a transitional location between the domestic properties to the east along Alderton Hill and more institutional scale of buildings towards the local town centre to the west, which includes the adjacent and recently constructed McCarthy & Stone Care Home, Roding Valley High School and Loughton Underground Station.

This application proposes a revised version of the scheme previously submitted to Epping Forest District Council (“EFDC”) in September 2017 (LPA Ref: EPF/2499/17, also referred to as the ‘previous application’), which was refused planning permission in April 2018, against EFDC officer recommendation, on the grounds that the proposed design was not considered to be in keeping with the character of the local area and further clarification regarding development viability was required.

Extensive efforts have been made by the applicant since April to engage EFDC officers, key stakeholders and members of the public in pre-application discussions to discuss design changes that have been made to the scheme to ensure the proposed development will appear more in keeping with the character of the area. The applicant is also engaged in on-going discussions with EFDC in relation to the potential for an appropriate contribution to be made towards the delivery of affordable housing in the District.

The proposed development (the “proposed development”) involves the demolition of the existing houses on the Site and redevelopment to create a new elderly housing development with integrated care and amenity facilities (Use Class C2). Alongside the elderly housing units, the proposed development works will comprise landscaping, parking, ancillary and associated works as well as a footpath to the front of the Site.

A thorough assessment of the proposal against the provisions of the Development Plan and national planning policy has been undertaken. It is considered that overall, the proposed development accords in all material respects with the relevant policies and provides a number of public benefits. A Statement of Compliance is included in **Appendix 1** of this Statement which details how this application conforms with the draft Local Plan.

The proposed elderly housing units will meet an identified need and provide further variety in Essex's housing stock. The C2 use would release family housing in the area alongside a reduction of users of local health care facilities. The family housing released through the downsizing process would result in significantly more family housing being brought back onto the market than would be the case when compared with a typical residential scheme.

Two of the three existing buildings are largely in a state of disrepair and detract from the general appearance of the local area. The loss of the existing residential homes is acceptable on the basis that the proposed development will deliver a substantial number of new homes for elderly people and enable the release of family housing locally, in addition to providing other economic and environmental benefits including 18 jobs and the planting of new mature trees on the Site.

Furthermore, the proposal introduces a new form of elderly residential care for the UK elderly housing market. The elderly housing units provide large apartments that are adaptable to the increased care needs of owners as they progress in years. Communal social and care facilities are provided to keep residents physically, mentally, and socially stimulated and promote a longer period of health. On-site care provided by Elysian Residences (which would manage the development post-construction) means that residents would not be required to move again due to deteriorating health.

The proposed development represents an opportunity to optimise the use of this highly accessible Site to provide a high-quality elderly living development with a range of associated benefits. Its careful design will ensure that it will have an acceptable impact on the amenity of its neighbours, while making a positive contribution to the appearance of the local area.

The proposed development has evolved through extensive pre-application consultation, including public consultation, to ensure it is aligned to local expectations in relation to its appropriateness in the local context. This has included constructive and positive feedback from EFDC officers and members of the public from an exhibition held in June 2018.

In respect of the three strands of sustainable development (Economic, Social and Environmental), as defined in the National Planning Policy Framework ("NPPF"), the proposed development would result in the following benefits:

- **Economic:** Support 18 full time equivalent ("FTE") jobs, which would include a range of occupations including medical staff, facilities management, social care, hospitality and maintenance. During construction it is expected that there would be an average of 320 people onsite during the two-year construction period, spending £380k per annum in the local area.
- **Social:** Through provision of a high-quality accommodation option for the elderly, the proposed

development will enable the release of a significant number of currently under occupied family homes into the local housing market.

- **Health:** The provision of elderly care housing has been shown to have a hugely beneficial impact on the health and wellbeing of residents living within them. Provision of specialist elderly housing with associated care helps to reduce the burden on the health and social care systems in two ways. Firstly, through the prevention of health-related issues, and secondly through delivering health and social care efficiently within the home environment.
- **Environmental:** The scheme will re-use a previously developed site in a highly accessible location, off-setting the need for greenfield development.
- **Design:** The Development has been designed in consultation with EFDC officers and other key stakeholders and will contribute high quality architecture to Alderton Hill, enhancing the appearance of Site. It will regenerate the unsightly existing brownfield land, which is of low architectural and townscape value, delivering an energy-efficient and sustainable use for the site for the foreseeable future.
- **Ecology:** A significant net increase in planting across the Site and a high-quality landscape strategy, as well as ecological improvement plans will significantly enhance the biodiversity value of the Site.

In conclusion, the proposed development will provide economic, social and environmental benefits and so represents sustainable development which is considered to accord with planning legislation, policy and guidance at the national, regional and local level.

1.0 INTRODUCTION

1.1 This Planning Statement has been prepared and submitted by DP9 Limited (“DP9”) on behalf of Elysian Loughton Site Limited (the “Applicant”) in support of a detailed planning application for full planning permission for the redevelopment of land at 13-15A Alderton Hill, Loughton (the “Site”), within the district of Epping Forest, to deliver a new elderly housing development with integrated care and amenity facilities.

Background

1.2 This planning application follows a planning application submitted to Epping Forest District Council (“EFDC”) in September 2017 (LPA Ref: EPF/2499/17) for the following development:

“Demolition of houses at 13, 15 and 15a, Alderton Hill, and the erection of linked blocks of elderly persons apartments, with integrated care facilities (Use Class C2) with supporting amenity facilities, landscaping, 64 car spaces in undercroft parking at the rear and south side of the block, and associated ground works.”

1.3 The above application was refused by Members of the Epping Forest District Council Area Planning South Planning Committee on 18th April 2018 for the following reasons:

- The height and bulk of the proposals would appear overbearing and incongruous with the existing pattern of development along Alderton Hill; and
- Absence of valid information within the Viability Assessment to determine whether the proposals could support an off-site affordable housing contribution.

1.4 A ‘way forward’ was provided on the Council’s decision notice, which states that:

“Members considered a redesign of the proposal to better reflect the character of the locality together with the resolution of areas of disagreement relation to the viability of the proposal may address their objections.”

1.5 Following the refusal of the application, the applicant and its project team has reviewed the scheme and incorporated changes which respond to Committee Members’ concerns as well as subsequent feedback received during pre-application discussions and meetings with officers.

Pre-Application Consultation

1.6 Consultation and discussions with a range of stakeholders have taken place throughout the development of the proposal for the previous application and to inform composition of the scheme, which have supplemented consultation responses received prior to and during the determination of the pending application (Ref:

EPF/2499/17). This includes formal meetings with EFDC planning and Essex County Council (“ECC”) highways officers.

- 1.7 A public consultation on the proposals was undertaken in June 2018, which provided the opportunity for local residents to pass comment on the updated scheme. A detailed analysis of the feedback received as well as a breakdown of all comments submitted as part of the public consultation are included within the accompanying Statement of Community Involvement (“SCI”).

The Proposed Development

- 1.8 This application seeks planning permission for the following development:

“Demolition of houses at 13, 15 and 15a, Alderton Hill, and the erection of linked blocks of elderly persons apartments, with integrated care facilities and supporting amenity facilities (Use Class C2), landscaping, 64 car spaces in undercroft parking at the rear and south side of the block, and associated ground works.”

- 1.9 The proposals consist of 89 extra-care residential units (Use Class C2) with integrated care and amenity facilities, including 1,522sqm of external amenity space alongside a range of internal on-site facilities including a gym, salon, dining and spa facilities. In addition, the proposals also include the provision of 64 car parking spaces for residents, staff and visitors as well as a mini-bus parking bay.
- 1.10 This application has been prepared following discussions with EFDC officers and a public consultation process that included an exhibition in June 2018. This application incorporates a number of changes to the previous scheme, including:
- Changes to the front façade reflecting the character of properties along Alderton Hill;
 - Reduction in the level of massing to the north of the Site;
 - Reduction in the number of units by 15%; and
 - Creation of a new zebra crossing along Alderton Hill.

Application Documents

- 1.11 In support of this application please find enclosed the following documents *for approval*:

- Planning Application Forms including relevant Certificates, prepared by DP9;
- Site Location Plan, prepared by Collado Collins Architects; and
- Planning Application Drawings, prepared by Collado Collins Architects.

- 1.12 The following documents accompany the planning application:

- Design and Access Statement, prepared by Collado Collins Architects;

- Planning Statement, prepared by DP9;
- Transport Assessment, prepared by WSP Parsons Brinckerhoff;
- Daylight & Sunlight Report, prepared by Point 2 Surveyors;
- Environmental Noise Survey, prepared by Hoare Lea;
- Health Impact Assessment, prepared by Volterra;
- Economic Statement, prepared by Volterra
- Desktop Drainage Survey, prepared by WSP Parsons Brinckerhoff;
- Biodiversity Survey, prepared by WSP Parsons Brinckerhoff;
- Tree Survey prepared by Ian Keen Associates;
- Transport Statement, prepared by WSP Parsons Brinckerhoff;
- Waste and Servicing Management Plan, prepared by WSP Parsons Brinckerhoff;
- Draft Construction Management Plan, prepared by Elysian;
- Air Quality Assessment, prepared by WSP Parsons Brinckerhoff; and
- Statement of Community Involvement, prepared by London Communications Agency.

Statement Structure

1.13 This Planning Statement is structured as follows:

- Section 2 - Site and Surrounding Area
- Section 3 - Site History
- Section 4 - The Development Proposal
- Section 5 - The Consultation Process
- Section 6 - Planning Policy Framework Overview and Principles of Redevelopment
- Section 7 – Planning Assessment
- Section 8 - CIL/Draft Section 106 Heads of Terms
- Section 9 - Summary and Conclusion

1.14 This Statement assesses the key planning considerations associated with the proposed development and considers the proposed development in the context of relevant national, regional and local planning policy and guidance. Section 6 of this Statement provides an overview of the key policy and guidance relevant to the determination of the proposed development. Text throughout the Statement refers to the relevant policy and guidance where necessary.

2.0 SITE AND SURROUNDING AREA

Site Description

- 2.1 The Site is located in Loughton within the District of Epping Forest. It is bound by Alderton Hill to the north and a railway embankment and allotments to the south. A McCarthy & Stone Retirement Living apartment development ('Poet's Place') forms the western Site boundary and the residential dwelling and garden of no. 17 Alderton Hill forms the eastern boundary.
- 2.2 The existing Site is 0.77 hectares in size and comprises three residential (Use Class C3) dwellings on individual plots. Two of the existing dwellings are vacant and in a state of disrepair following relocation of previous occupants prior to the Appellant purchasing the Site.
- 2.3 Topographically, there are variations between levels across the Site. Alderton Hill is located on an incline which generates a level change of approximately 4m from the western to the eastern boundary of the site, roughly the equivalent of one storey.
- 2.4 The Site lies approximately 420m from the centre of Loughton. It has good public transport links and is located within London Underground Zone 6. Loughton Underground Station is approximately 400m from the Site, which benefits from access to the Central Line.

Designations

- 2.5 There are no specific adopted policy designations for the Site, although, the site is within short distance of the Loughton Town Centre boundary.
- 2.6 The Site is not listed nor within a conservation area. There are also no Tree Protection Orders associated with the Site.

Surrounding Context

- 2.7 The surrounding area contains buildings of varied character and massing.
- 2.8 The Site occupies a 'transitional' location approximately 220m from the edge of Loughton town centre, between the traditional residential character of Alderton Hill rising to the east and the larger scale institutional scale of buildings comprising the three storey Poet's Place development, buildings that form Roding Valley High School, and a Sainsbury's supermarket, which lie between the Site and Loughton High Road in the middle of the town centre to the west.
- 2.9 Opposite the Site to the north lies the junction of Alderton Hill and Brook Road and another residential

dwelling. Of note, the Site backs onto an embankment next to the London Underground Central Line at the rear, and not other housing. In addition to the distinct nature of the Site in terms of its location between different types of building characteristics, this distinguishes the Site from other residential plots further up Alderton Hill.

- 2.10 The railway to the south of the Site provides a clear buffer between the Site and allotment land to the south east and south west.
- 2.11 There is a rich and diverse local architectural vernacular with a variety of building details and materiality reflecting the continued redevelopment of plots over time.
- 2.12 The area is also characterised by mature trees and screening along Alderton Hill. Some of this character has been eroded over time through an increased preference for high walls and gates.
- 2.13 A comprehensive assessment of the local built context and the architecture of the Proposed Development can be found in the design information prepared by Collado Collins Architects and submitted in support of the application.

3.0 SITE HISTORY

- 3.1 The Site has a limited planning history. The following applications have been listed for the Site on the Council's planning registry.

13 Alderton Hill

- 3.2 An application was submitted (application ref: EPF/0671/01) for the demolition of the bungalow and replacement with a detached house. The application was approved April 2001.

15 Alderton Hill

- 3.3 An application was approved in August 1987 (LPA ref: EPF/1237/87) for a single storey front and two storey side extensions.

15a Alderton Hill

- 3.4 An application was granted planning permission in October 2003 (LPA ref: EPF/1901/03) for a new house to replace the existing bungalow.

13 – 15a Alderton Hill

- 3.5 As previously identified in this Planning Statement, an application for the redevelopment of the Site to deliver elderly care accommodation (Use Class C2) together with supporting amenity facilities, landscaping, 64 car parking spaces and associated ground works was submitted to EFDC in September 2017 (Ref: EPF/2499/17) was refused on 18th April on design and viability-related grounds, which are discussed in further detail in Section 8 of this Statement.

Surrounding Area

- 3.6 Relevant applications have also been submitted in the surrounding area.
- 3.7 The adjacent site, the former tennis courts site Junction of Alderton Hill and Roding Road, was granted planning permission in 2015 for the *'erection of 38 'Retirement Living' (Category II) apartments for the elderly in a part 3 and part 2 storey development, including associated communal facilities, 32 off street car spaces, landscaping and access on to Alderton Hill'* (LPA ref: EPF/1103/15). The construction of this development has recently been completed.

4.0 THE APPLICATION PROPOSAL

4.0 This section provides a summary of the proposed development and should be read in conjunction with the accompanying Design and Access Statement which provides full details of the proposals.

4.1 Full planning permission is sought for the redevelopment of the Site for:

“Demolition of houses at 13, 15 and 15a, Alderton Hill, and the erection of linked blocks of elderly persons apartments, with integrated care facilities (Use Class C2) with supporting amenity facilities, landscaping, 64 car spaces in undercroft parking at the rear and south side of the block, and associated ground works.”

4.2 The proposed development comprises provision of 89 new elderly housing units (use class C2) accommodated within two linked buildings, set in landscaped grounds and screened by a mature landscape buffer.

The Proposed Use

4.3 The proposed elderly care operating model is new to the UK market but is well established in the USA and most other Organisation for Economic Co-Operation and Development (OECD) countries. The Applicant’s objective is to provide a very high quality of accommodation (Use Class C2) for elderly people that is designed to keep them healthy and active. It will be constructed and managed by the applicant / Elysian Residences (“Elysian”)

4.4 Every Elysian site has 24-hour care staff and facilities to provide care to all residents. The sites also provide significant common facilities, which have been designed using best practices developed in the USA to keep the elderly residents active, socially engaged and healthy. In other overseas locations where the type of elderly housing proposed is more prevalent, studies have shown that the elderly live on average 2+ years longer, and have a compression of morbidity so they are very frail/ill for a very short period at the end of their life.

4.5 A key part of the business model is that residents get the benefit of extra longevity, higher degrees of health and wellness and dramatically reduced levels of loneliness due to the extra facilities in the community. The resident’s experience and health and wellness support does not start and stop at their front door; the entire community, and all of the extra facilities and service within the community, acts to support the health and wellness of residents, similar to a nursing home. The ethos of Elysian’s communities are very different to a nursing home, however, in their aspirational design as well as the way in which residents are challenged to be active and live dynamic, vibrant lives, in spite of their physical and other limitations, regarding which Elysian provides the necessary support.

4.6 Residents will benefit from engaging amenities and an active social environment. The integrated package includes the following communal facilities to give residents the quality of life that they need to live fully and age successfully:

- Medical Suite (inc. 24 hour care)
- Lobby
- Restaurant
- Cafe / Bar
- Garden Room
- Wellness Suite containing Gym and Salon facilities
- Activity Room
- Private Dining
- Assisted Living Dining
- Courtyard Garden
- Communal roof terrace
- Community Minibus
- Car Club
- Scooter storage and charging facilities
- Guest room

Design and Landscape

4.7 The proposed development is of high architectural quality. Its massing and form have been developed to ensure the proposal is appropriate for its context both with regard to the Site's location as a transitional piece between the domestic scaled buildings to the east and the institutional buildings to the west. In addition, the proposals preserve the amenity of neighbouring occupiers. A suite of supporting documents accompanies this application to assess and ensure that locally, the proposed development has a positive impact on the appearance of the built environment and the public's enjoyment of the local area. The design of the scheme has evolved substantially throughout the previous application process and prior to the submission of this application.

4.8 The proposed building on Alderton Hill is formed of two elements joined by a single-storey glazed lightwell, a feature which breaks the massing of the built form and gives the perception of two separate 'houses' on the Site.

4.9 As shown in the supporting Design and Access Statement, Collado Collins working with local architect 88 Partnership, has undertaken a comprehensive analysis of the local architectural vernacular to ensure the architectural form and detailing of the proposed development is consistent and complementary to the local area. The effect is a development which enhances the quality of local Alderton Hill streetscape.

4.10 The design of the proposed buildings has been amended from scheme that was submitted in September 2017 in the following ways:

- Lowering the front building facing along Alderton Hill, including a ridge reduction of 2.4m on the front;
- Altering the principal gable to create two gables which have also been lowered, creating a slimmer appearance;
- A reduction in the number of C2 units from 105 to 89;
- Revising the materials of the gables to the building to improve relationship to the surrounding context. This includes replacing the former brick articulation with a black and white half-timbered appearance;
- Reducing the link block to the lower ground and ground floor only, moving 1 lift into the entrance building for operational purposes which will create a higher level of fragmentation in across the main façade;
- Widening the corridor in front of the lift in the entrance building to improve circulation throughout the building; and
- Addition of a deck over the rear parking area, creating an additional 612sqm of amenity space for residents.

4.11 The proposed development has put a landscape strategy at the heart of its concept, with the layout of development dictated by the need to preserve the green nature of the Site and specifically respecting the mature screened setbacks from the road alongside general tree screening across the Site. A number of recent developments along Alderton Hill have included high walls and gates, which has eroded the 'leafy' nature of the streetscene. The proposed development has been designed to help to repair the traditional character of the street by reinforcing the green nature of the local streetscape.

4.12 The proposed development will incorporate a rich and high-quality collection of different landscaped areas to provide opportunities for residents to enjoy outside spaces whilst providing a pleasant outlook locally. The individual apartments and communal spaces have all be designed and oriented to benefit from the surrounding landscape, as well as optimum daylight conditions.

Access and Transport

4.13 The Site enjoys good accessibility to public transport with Loughton station being located within walking distance to the west of the site providing access to London Underground Central Line services. The nearest bus stops to the Site are located on Alderton Hill. Additionally, the amenities and services located on Loughton High Road are within close proximity of the Site and accessible by local regular bus services.

4.14 The existing condition currently includes 5 vehicle crossovers onto Alderton Hill. The proposed development will consolidate vehicle access into one primary point of entrance and exit on the eastern edge of the Site. A further point of egress will be located further along the western edge of the site, this will be controlled to

only allow use by the Council's refuse vehicle, servicing and emergency vehicles. Importantly therefore all servicing will take place on-site, with no stopping on the public highway.

- 4.15 A total of 64 car parking spaces will be provided on the Site. This includes 11 spaces for visitors and occasional staff parking. As detailed within the accompanying Transport Statement prepared by WSP, the proposed number of spaces has been modelled based on other elderly assisted living schemes, arguably in less accessible locations by public transport. Staff employed to work on the site will be encouraged to access the site via another means than private car. Cycle parking will also be provided.
- 4.16 All parking bays will be managed by an on-site valet with vehicles being dropped off and picked up from an area adjacent to the main residential entrance, which in turn is accessed from Alderton Hill at the north eastern corner of the Site. In addition, a minibus parking bay has been incorporated and an on-site car club vehicle will be available for the use of residents on the site. Facilities for the storage and charging of mobility scooters is also proposed across the Site.
- 4.17 The Site is largely self-contained and it is envisaged that residents will seldom feel a need to leave the Site. The impact of potential vehicle trips on the local highway network has been modelled which demonstrates that the existing highway infrastructure has capacity and further that the proposed development will not have a detrimental impact on current peak flows, given that residents are unlikely travel during peak times.
- 4.18 The principle of the proposed access arrangements have been discussed and agreed with Essex County Council.

Sustainability

- 4.19 A number of measures are to be incorporated into the design to minimise carbon emissions and enhance the Site's sustainability criteria.

5.0 CONSULTATION

- 5.1 This section summarises the pre-application process and the public consultation that has been carried out in advance of submission of the enclosed application. It should be read in conjunction with the Design and Access Statement and the Statement of Community Involvement submitted with this application.
- 5.2 The NPPF states that ‘good quality pre-application discussion enables better communication between public and private resources and improved outcomes for the community’. It encourages applicants to take up pre-application advice services offered by Local Planning Authorities and to engage with their local community.
- 5.3 As such, the applicant has undertaken detailed pre-application consultation with the decision-making authority (EFDC), key stakeholders and the local community prior to the submission of the application. The project team has taken an active approach to engaging with the decision makers and key stakeholders throughout the decision process.
- 5.4 A summary of the key focus of the consultation and feedback is provided below.

Pre-application Process

- 5.5 The applicant has engaged in an extensive programme of pre-application engagement in relation to the previous application and this current proposal. This has included meetings with EFDC Planning Officers and local stakeholders. The comments received during this period have informed the design evolution of the proposed development, from the original scheme submitted in September 2017 to the proposal that is the subject of this application.

Pre-application feedback from EFDC officers

- 5.6 Officers were engaged in a series of pre-application meetings and were presented with proposals for a development of a similar nature to the proposed development, albeit of a slightly greater scale, prior to the submission of the previous application. Meetings took place on 7th June and 8th August 2017 and a summary of feedback received is provided below:
- *Officers agreed that due to the nature of the proposal and its integrated care offer the proposal constitutes a C2 use class development.*
 - *In design terms, the breaking up of massing along the Alderton Hill elevation was positively considered to be sympathetic to the character of the existing streetscape. Officers noted that*

further design work would be required to ensure an appropriate neighbouring relationship with the properties on Hogarth's Reach and incorporation of a more traditional roof design.

- *The social aspects of the proposals were positively appraised and officers recommended that avenues to create further links with the local community should be explored.*
- *The site benefits from a unique condition along Alderton Hill and as such proposals to develop on the land were not considered to represent infill or 'back garden' development between rows of houses. The pre-application proposals were not considered by officers to set a precedent for development further along Alderton Hill.*
- *Officers welcomed the contextual approach to architecture.*
- *Officers expressed a need to ensure that the C2 use and in particular the eligibility of residents would be secured as part of the planning permission through a legal obligation.*

5.7 A further meeting was held with EFDC officers on 16th May 2018, following the determination of the previous application, to discuss the revised proposal that is the subject of this application. Officer feedback comprised the following:

- *Considered that proposed design changes (to reduce the ridge height of the building and its appearance onto Alderton Hill) positively respond to the first reason for refusal in relation to the previous application.*
- *Officers agreed that the Local Planning Authority's Valuer would re-engage with the applicant's Viability Consultant (DS2) to achieve common ground on scheme viability and welcomed a proposal to provide an affordable housing contribution (commensurate to the cost of progressing the on-going appeal to a decision) as a positive response to the second reason for refusal.*

5.8 It is worthy of note that it was agreed at the meeting of the Council's Area Planning Sub-Committee South on 26th September 2018 that the second reason for refusal for the previous scheme should be dropped following further consideration of the findings of the Council's specialist Viability Consultant.

Third Party Consultation

5.9 Following submission of the previous application, the applicant continued its comprehensive approach to neighbour consultation during the determination period. During this time, the applicant engaged in detailed dialogue with the owners of No. 17 Alderton Hill to address concerns in relation to the scale of

the proposed building. Through this engagement, the applicant agreed to reduce the massing on the eastern side of the proposed development, reducing the number of proposed units.

- 5.10 The applicant has also sought, through the placement of massing and extensive landscaping using mature trees, to ensure that the amenity of future residents in the Poet's Place development to the west of the Site are unaffected by the proposal.
- 5.11 Prior to the submission of this application, the applicant has met with residents of the Poet's Place development on 14th June and 12th July 2018 to discuss possible amendments to the western side of the scheme. Further meetings have also been held with residents along Alderton Hill, Sparelease Hill and Tycehurst Hill.

Public Consultation

- 5.12 The applicant also presented the previous proposal at public consultation events on 10th and 12th August 2017. The events were well attended and provided opportunities for engagement with local residents and elected Councillors. In light of the feedback, the applicant incorporated some key changes to the proposals including:
- 10% reduction in unit numbers;
 - Reduction in height of the proposed development (i.e. the proposed ridgeline to the east is now below that of No. 17 Alderton Hill);
 - Increased number of on-site parking spaces;
 - Introduction of hips to the roof to provide a better neighbouring transition; and
 - Changes to material treatment and articulation to respond to local context.
- 5.13 Following the determination of the previous application, a further round of public consultation was held at events on 21st and 23rd June 2018. Valuable feedback was received from local residents, which was generally positive, particularly in relation to the principle and updated design of the proposed development.
- 5.14 As a result of the above engagement, the following further changes have been incorporated into the proposed development since the determination of the previous application:
- Reduction in the number of units from 105 to 89 (a further 15% reduction);
 - Reduction in the level of massing to the north of the Site;
 - Increase in the level of amenity space offered to residents;
 - The creation of a single-storey glazed link (previously three storeys);
 - Additional tree planting along Alderton Hill;
 - Improvements to the existing footpath and delivery of a new zebra crossing along Alderton Hill; and

- Changes to the external materials and introduction of part timber façade treatment to the principle building.

6.0 PLANNING POLICY CONTEXT

- 6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan, unless material considerations indicate otherwise.
- 6.2 This Section identifies national, regional and local planning policy and guidance of relevance to the determination of the application. An analysis of the key policies and tests relating to the proposed development are included within this Section.

National Planning Policy and Guidance

- 6.3 The revised National Planning Policy Framework (NPPF) was adopted on 24th July 2018 and contains the Government's planning policies for England and how these are expected to be applied. The Government published the National Planning Practice Guidance (NPPG) in March 2014 which is expected to be updated in full by September 2018. The NPPG provides planning policy guidance at a national level and is a material consideration in the determination of planning applications. It is intended to provide guidance to local planning authorities and developers on the implementation of the planning policies set out within the NPPF.
- 6.4 At the heart of the NPPF is a presumption in favour of sustainable development, for both plan making and for decision taking. The NPPF directs local planning authorities to approve development proposals that accord with the development plan without delay.
- 6.5 NPPF paragraph 8 recognises that there are three dimensions to sustainable development: Economic, Social and Environmental. These dimensions give rise to the need for the planning system to perform a number of roles, which are mutually dependent and should not be undertaken in isolation:
- *An Economic Role - contributing to building a strong, responsive and competitive economy by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying coordinating development requirements, including the provision of infrastructure;*
 - *A Social Role - supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and supports its health, social and cultural well-being; and*

- *An Environmental Role - contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.*

6.6 Paragraph 61 of the revised NPPF includes a requirement for local planning authorities to recognise the need for the delivery of homes for older people . Currently some planning authorities, including EFDC, do not individually recognise housing for older people within individual housing delivery targets.

6.7 Paragraph 91 states that decisions should aim to achieve healthy, inclusive and safe places.

6.8 With regard to transport, Paragraph 108 of the revised NPPF states that development should ensure that:

- a) *“appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
- b) *“safe and suitable access to the site can be achieved for all users; and*
- c) *“any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.”*

6.9 The revised NPPF also includes a new chapter titled ‘Making effective use of land’. Paragraph 117 directs decisions to *“promote an effective use of land in meeting the need for homes and other uses”*. Paragraph 118 part (c) develops this position where it states that ‘substantial weight’ should be given to *“the value of using suitable brownfield land within settlements for homes and other identified needs”* and part (d) promotes and supports *“the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively.”*

6.10 With regard to development density, Paragraph 122 states that:

“Planning policies and decisions should support development that makes efficient use of land, taking into account:

- a) *the identified need for housing and other forms of development, and the availability of land suitable for accommodating it;*
- b) *local market conditions and viability;*
- c) *the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel*

modes that limit future car use;

d) the desirability of maintaining an area's prevailing character (including residential gardens), or of promoting regeneration and change; and

e) the importance of securing well-designed, attractive and healthy places."

6.11 Paragraph 127 sets out criteria to be taken into account by new developments.

Adopted Local Planning Policy

6.12 The Development Plan for the Site comprises:

- Epping Forest District Council Combined Local Plan (1998) and Alterations (2006)

6.13 Paragraph 11 of the NPPF (July 2018) states that where policies which are important for determining applications are out of date, permission should be granted unless the NPPF protects certain areas or assets of particular importance or the adverse impacts created by the development would outweigh the benefits.

Emerging Local Planning Policy

6.14 A new EFDC Local Plan is currently being prepared by the Council. The Local Plan Submission Version ("LPSV") was published for consultation between December 2017 and January 2018 and was submitted to the Secretary of State for Housing, Communities and Local Government in September 2018. Hearing dates for its Examination in Public ("EiP") are not expected to be published until early 2019.

6.15 The applicant is of the view that the LPSV policies hold limited material planning weight as the LPSV has not been fully tested at an Examination in Public ("EiP") and there are a number of unresolved objections to its draft content. Notwithstanding, a separate LPSV Statement of Compliance has been included at Appendix 1 of this Statement, which demonstrates that the proposed development complies with the relevant policies of the LPSV.

6.16 The Site is part of the Emerging Loughton Neighbourhood Area which was approved in June 2015. Loughton Town Council are currently in the process of preparing a Draft Neighbourhood Plan but dates for consultation or the submission of the Neighbourhood Plan are unconfirmed.

7.0 PLANNING ASSESSMENT

7.1 This section reviews the proposed development in the context of relevant policies contained within the above Development Plan documents and provides an assessment of how the proposed development complies with planning policy in respect of the following:

- Principle of Development
- Land Use
- Design and Townscape
- Neighbour amenity:
 - Overlooking and outlook
 - Daylight/Sunlight
 - Noise and Vibration
- Environmental Issues:
 - Socio Economic
 - Drainage
 - Energy and Sustainability
 - Ecology
 - Air Quality
 - Contamination
- Transport

Principle of Development

7.2 The NPPF states that *“At the heart of the planning system is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan making and decision taking...”* it goes on to state, *‘All plans should be based upon and contain the presumption in favour of sustainable development as their starting point, with clear priorities that will guide how the presumption should be applied locally.’*

7.3 The Local Plan (2008) sets out a number of objectives for achieving sustainable development objectives, these are set out in Policy CP1 as follows:

“(i) avoid, or at least minimise, impacts of development upon the environment;

(ii) secure the provision of sufficient types and amounts of housing accommodation, and different facilities, to meet the needs of the local population;

(iii) give effect to the Epping Forest Community Strategy;

(iv) achieve a mix of local employment;

(v) avoid further commuting;

(vi) help achieve prudent use of natural resources; and

(vii) minimise the use of non-renewable resources, including greenfield land.”

- 7.4 The proposed development will provide a very high-quality elderly housing development with integrated care facilities with supporting amenity facilities to the area.
- 7.5 The proposed residential model has been developed to give residents the opportunity to live an active and fulfilled lifestyle in purpose built, well designed homes, with healthcare support. The proposed development will include activities such as fitness classes, an onsite restaurant, guest speakers and arts and crafts as well as 24-hour care provision. This model differs from traditional care home provision by allowing residents to live in their own homes, but with onsite access to healthcare and amenities. The homes are designed so that the scale of support can change over time as and when the residents require more healthcare services and support. Compared to more common types of elderly housing in the UK, residents of the proposed development will not need to consider relocating if their care or medical needs change.
- 7.6 Typically, residents will remain in their current homes which do not meet their care needs. These homes are often the original family homes and in the majority of circumstances are under-occupied and physically inadequate to meet elderly care needs. The provision of new homes designed for elderly occupants with diverse care needs will ensure that these family homes are released into the local housing market
- 7.7 The provision of this high-quality development is particularly desirable because of the Site’s high level of accessibility satisfying requirements of sustainable transport initiatives from both the current and emerging Local Plan.
- 7.8 In total, the proposed development is expected to deliver 18 jobs on the site which will provide a significant economic boost for the local area.
- 7.9 For the above reasons, the proposed development is in accordance with planning policy and the Government’s overarching objectives for sustainable growth. The proposed development will act as a crucial piece in the regeneration of the existing Site.

Land Use

- 7.10 The existing lawful use of the buildings on the Site currently comprise C3 residential use. Two of the three buildings have been vacant prior to the Applicant's acquisition of the Site in March 2017.
- 7.11 The glossary to the NPPF includes a definition of 'older people' which acknowledges the ranging needs of the group *'whose housing needs can encompass accessible, adaptable general needs housing through to the full range of retirement and specialised housing for those with support or care needs.'* (page 54). The proposed development seeks to provide this range of accommodation in one location for elderly people downsizing from their family home and where care and medical support may be needed.
- 7.12 The NPPF identifies the need to provide elderly housing as essential, due to the increase in households aged 65 and older. The proposed development intends to stimulate the local housing market by increasing the amount of housing stock for family homes.
- 7.13 Epping Forest District Council Local Plan Policy CF2 states that the Council will support proposals which develop health care facilities that meet the needs of residents provided that the Site is accessible and is not within the Green Belt nor will it result in amenity or environmental issues.
- 7.14 Similarly, the Housing Strategy for England (2011) supports this view. Of the projected growth in households to 2033, 60% is made up of households aged 65 years and older.
- 7.15 The Government's Housing Strategy recognises the difficulties facing the housing market and that a new approach is needed to allow people access to the type of home they require. It is stated that 42% of households are retired and 66% own their own home outright. As life expectancy increases these households will require support to remain in their homes in later life. And the current limited choice in the housing market makes it difficult for older households to find homes that fully meet their needs.
- 7.16 New policy approaches are required to meet the variety of needs to ensure the highest quality of life for older people. Innovative approaches and initiatives are needed to meet the various needs, ranging from independent living through to specialist care accommodation. The proposed operating model for the new elderly housing development with integrated care facilities falls within the C2 land use definition.
- 7.17 In relation to confirming whether the proposed use is defined as a C2 use, it should be noted that in the past, interpretations over whether development is defined as residential institution use (C2); or dwelling house (C3) use, have largely depended on whether provision of nursing / healthcare services has been integrated into the community.
- 7.18 The Town and Country Planning (Use Class Order) 1987 defines Residential Institutions (C2) as 'use for the provision of residential accommodation and care to people in need of care, other than a use within class C3

(dwelling house)'. Whilst the principal focus of the debates has been centred upon the level of care provided to occupants; consideration has recently been made to the structure and layout of accommodation and extra facilities designed to be tailored to elderly needs.

7.19 It is proposed that a restriction to be applied to residents of the proposed development requiring them to subscribe to at least a basic care package. The basic care package will include a minimum standard of personal care to be provided to the occupiers as follows:

- 4 hours per week personal care;
- the provision of at least one daily meal; and
- The laundering of all bedlinen and towels on a regular basis.

7.20 The care model for the proposed development will be delivered by a care provider formally registered by the Care Quality Commission.

7.21 It is proposed that a key to each unit will be retained on the site by Management. A requirement will be made for residents of the proposed development to carry out periodical assessments of care need; with regular monitoring and care visits taking place outside of a scheduled formal assessment programme.

7.22 It is proposed that a Section 106 Agreement would confirm details of minimum age restrictions for the residents of the proposed development. There will also be a restriction on occupation to a resident who meets the age criteria plus a spouse or partner (i.e. no other dependents).

7.23 In addition, the proposed development will include a range of communal facilities amounting to circa 20% of the total development floorspace. Facilities will include the following:

- Medical Suite (inc. 24 hour nursing station)
- Lobby
- Restaurant
- Cafe / Bar
- Garden Room
- Wellness Suite containing Gym and Salon facilities
- Activity Room
- Private Dining
- Assisted Living Dining
- Courtyard Garden
- Communal roof terrace
- Community Minibus
- Car Club
- Scooter storage and charging facilities
- Guest room

7.24 This land use is appropriate for the enhancement of the existing Site, the local economy and housing stock, in accordance with relevant with planning policy. Furthermore, EFDC officers confirmed during pre-application discussions that the proposed development is formally recognised under a C2 use class which is considered an appropriate land use for the site.

Design and Townscape

7.25 Section 12 of the NPPF recognises good design ‘as a key aspect of sustainable development’ which ‘is indivisible from good planning, and should contribute positively to making places better for people’.

7.26 The design of the proposed development is of the highest standard for the new building and the public realm. Its appearance has been revised from the previous proposal to be more reflective of the distinct architectural context of the surrounding area, complementing the existing homes in the area, and its layout will optimize its function.

7.27 The supporting Design and Access Statement provides detailed analysis of the proposal in respect of its design.

7.28 NPPF para. 56 states that the Government attaches great importance to the design of the built environment and that good design is a key aspect of sustainable development and should contribute positively to making places better for people. Para. 58 outlines that planning policies and decisions should aim to ensure that developments:

- *“function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- *establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;*
- *optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support local facilities and transport networks;*
- *respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation;*
- *create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and*
- *are visually attractive as a result of good architecture and appropriate landscaping.”*

7.29 At the local level, the proposed development acknowledges the design objectives of the Local Plan. The design and layout of the proposed development is based on the existing building patterns in the area. It respects its unique transitional setting in terms of scale, proportion, siting, massing height, orientation, roof-line and detailing; is a size and position such that it adopts a significance in the street scene which is appropriate to its use; and, employs external materials which are sympathetic in color and texture to the

vernacular range of materials, in line with Local Plan Policies DBE5 and DBE1. It is also compliant with Local Plan Policy CP7 in that it will recycle vacant, derelict and degraded land to provide new accommodation and adopt densities that are compatible with the character of the area concerned and urban design controls.

- 7.30 The proposed development is therefore considered to accord with national, regional and local planning policies relating to high quality design.

Landscaping

- 7.31 The landscaping strategy for the proposed development reinforces the established and reputable character of Alderton Hill. The proposed development will consolidate the current multitude of crossovers across the pavement fronting Alderton Hill into just two points of entry, with a formal hedge complemented by existing and new mature trees which will provide an appropriate and traditional boundary treatment to Alderton Hill.
- 7.32 The proposed communal courtyard, will act as a main feature of the proposed development, designed by award winning landscape architects Bradley-Hole Schoenaich Landscape. Further details of the landscaping can be found in the Design and Access Statement.
- 7.33 A detailed Arboricultural Report produced by Ian Keen Associates includes a comprehensive assessment of the existing trees on Site. As noted in the report, there are few trees of notable quality and a number of trees require removal as they are either dead or decaying. Where possible the maximum number of living trees have been retained. Where removal is required this is only to enable construction and concerns trees within the middle of the Site which have no bearing on its appearance from Alderton Hill and the local area. Importantly, the proposed development will include the provision of a number of new mature trees, amounting to a significant increase in the number of trees on the Site. This will ensure the proposed development is well screened to protect the amenity of neighbouring properties and is complementary of the leafy character of Alderton Hill and the district generally.
- 7.34 The proposed development will increase the overall number of trees on Site in accordance with Policy LL12.

Neighbour's Amenity

- 7.35 The NPPF requires sustainable development. As such, developments should aim to minimise adverse effects on the local environment and neighbouring properties. The proposed development has been designed to sit within its context and be a respectful neighbour to the properties surrounding it, in line with Policy DBE2 of the Local Plan.

- 7.36 The proposed development would result in a number of visual benefits locally, including a high-quality landscaping scheme and replacement of existing dilapidated buildings with high quality, contextually appropriate, buildings.

Overlooking

- 7.37 The key factors for assessing overlooking are the local urban context and arrangement of buildings. During the pre-application process, the design of the proposed development progressed with the advice of EFDC officers to ensure the proposed development provides no overlooking of neighbouring properties. This has been achieved through a considered building and fenestration layout and the provision of a mature tree strategy to provide appropriate screening. It is therefore considered that the proposals will not result in any loss of amenity for neighbouring properties through overlooking in accordance with Policy DBE9.

Daylight/Sunlight

- 7.38 A detailed assessment of the effects of the proposed development on the daylight and sunlight amenity of the occupiers of neighbouring properties and the proposed C2 units has been undertaken and is detailed within the supporting Daylight/Sunlight Report prepared by Point 2.
- 7.39 National guidance in relation to daylight and sunlight matters is contained within BRE report 'Site layout planning for daylight and sunlight: A guide to good practice'. Local Policy DBE9 states that new development must not result in an excessive loss of daylight/sunlight for neighbouring properties or cause significant visual impact.
- 7.40 The internal daylight assessment undertaken as part of the report highlights near full BRE compliance with most rooms tested exceeding the target values for room use.
- 7.41 The proposed development will not result in excessive loss of amenity for neighbouring properties in relation to daylight and sunlight. The proposed development has taken into consideration overshadowing of adjacent sites, and the overall conclusion of the supporting Daylight and Sunlight Report is that the proposed development is considered to be acceptable in the context of Local Plan Policy DBE9 and BRE guidance in relation to daylight/sunlight and overshadowing.

Noise and Vibration

- 7.42 Air Quality and Noise Assessments have been submitted in support of this application. They include an assessment of likely air quality effects arising as a result of the construction of the proposed development and of the predicted air quality at the Site during operation. It proposes mitigation measures to ensure impacts are regulated to appropriate levels.

- 7.43 Construction effects have been assessed and the report concludes that that with the appropriate best practice mitigation measures there is likely to be an insignificant effect from dust-generating activities on site. Further details are included in the Draft Construction Management Plan.
- 7.44 The proposed development will not cause excessive noise pollution in accordance with Local Plan Policy RP5A.
- 7.45 The Noise Impact Assessment submitted in support of this application also proposes mitigation measures to reduce the impact of noise pollution to appropriate levels which can be secured by condition.

Socio Economic

- 7.46 An Economic Statement has been prepared by Volterra in support of the application. The statement provides an analysis of the socio-economic impact of the proposed development in the local area and district.
- 7.47 The associated benefits of the proposed C2 use can be summarised as:
- *Benefits to future residents:* the provision of a new elderly housing development with integrated care facilities. Purpose built housing for the elderly allows people to live independently for longer. These units will have associated support services to meet residents care and health needs as required. A significant benefit to residents' wellbeing would be the community and social activities available.
 - *Benefit to the healthcare system:* Enabling residents to live independently longer will help to reduce pressure on the healthcare system through prevention of health-related issues and by delivering health and social care efficiently within the home environment.
 - *Benefits to the housing market:* There is a significant issue of elderly residents under occupying housing. Delivery of assisted/ independent living units provides elderly residents with an attractive option when looking to downsize. This helps to unlock family sized units back into the housing market.

- 7.48 The proposed use constitutes a C2 use class and would meet an identified and increasing need within the Borough as well as potentially having a number of knock on benefits in respect of the local housing stock and local health care provision.

Drainage

- 7.49 A Flood Risk Assessment ("FRA") has been prepared by WSP Parsons Brinckerhoff in support of the application. As noted in the assessment, the site is located within Flood Zone 1 (i.e. lowest risk) which states that there is a less than 1 in 1000 annual probability of river or sea flooding. The report also identifies the site within a critical drainage area. Potential sources of flooding have been investigated and mitigated as appropriate through suitable design measures.

- 7.50 An Outline Drainage Strategy has been developed to manage surface water within the proposed development, taking into account the potential climate change impact. Foul water discharge has also been considered as part of the development proposal. Thames Water has confirmed prior to the submission of this application that the existing infrastructure can accommodate flows from the proposed development.
- 7.51 The proposed development therefore accords with the provisions of Local Plan policies U2A and U2B.

Energy and Sustainability

- 7.52 Local Plan Policy CP4 requires new development to incorporate principles of energy conservation in relation to design, massing, siting, orientation and layout of buildings. Appropriate measures to use energy saving/generating technologies should be provided where appropriate.
- 7.53 In addition, planning policies currently refer to achieving compliance with Part L 2013. To meet the target fabric energy efficiency (TFEE) requirements of Part L 2013, the proposed development will incorporate a number of passive design and active energy efficient measures. This will include a high-performance, engineered façade, high specification windows, solar control measures, low energy lighting and energy efficient lighting controls.

Air Quality

- 7.54 Local Plan policy RP5A resists development where it could cause excessive air pollution. The planning application is supported by an Air Quality Assessment prepared by WSP Parsons Brinckerhoff.
- 7.55 The findings of the assessment illustrate that impacts on air quality during the construction stage can be mitigated, with further detail is contained within the Draft Construction Management Plan. During the operational stages, the assessment has found that impacts on air quality will not be significant. The proposed development is in accordance with policy RP5A on this basis.

Biodiversity

- 7.56 Local Plan policy CP2 requires development to preserve and enhance local biodiversity and networks of natural habitats. WSP Parsons Brinckerhoff have undertaken ecological surveys of the Site, the findings of which are contained within the Preliminary Ecological Appraisal (PEA) submitted in support of the application. The PEA states that the Site is of low level of ecological value although includes potential roosting opportunities for bats alongside evidence of mammals such as foxes using the site for foraging, but such findings are not uncommon for a residential site in a semi-dilapidated condition. Visual surveys prior to demolition and construction activities are recommended to ensure that the redevelopment of the site is undertaken in a sensitive manner.

- 7.57 Redevelopment of the Site creates an opportunity to promote biodiversity across the site through the introduction of a high-quality landscaping scheme incorporating a diverse range of plant species and green spaces. These provide opportunities for new habitats and foraging areas thereby raising the ecological value of the site, in accordance with Local Plan Policy CP2.

Transport

- 7.58 The Local Plan Policy ST2 requires new development to provide convenient and secure facilities for parking and sheltered cycle parking. Further, that major developments should be well served by public transport and if necessary, make provision for enhanced services and infrastructure. Policy ST1 which encourages development to be located in urban areas with high accessibility and good links to transport and Policy ST6 which expects all new development proposals to deliver on-site parking in accordance with standards are also relevant considerations.
- 7.59 A comprehensive Transport Statement has been prepared by WSP Parsons Brinckerhoff and accompanies this planning application.
- 7.60 The proposed development is located close to Loughton London Underground Station, providing good access to the London Underground train network and onwards towards central London or Epping. Such provision supports the needs of residents as well as visitors and staff. On this basis, the proposed development is consistent with the principle of policies ST1, ST2 and ST6 outlined above.
- 7.61 The proposed development consolidates current access arrangements on the Site. The arrangement allows all vehicle deliveries associated with the scheme to be undertaken on-site, including the Council's own refuse collection. Furthermore, provision is included for emergency vehicle access. These proposed access arrangements have been discussed and agreed with Essex County Council.
- 7.62 A Waste and Servicing Management Plan prepared by WSP Parsons Brinckerhoff accompanies this application to demonstrate that appropriate provisions have been made for the operation of the proposed development.
- 7.63 The proposed development includes 64 parking spaces on-site. As set out in the supporting Transport Statement, this provision is based on an assessment of other elderly assisted living schemes albeit these comparables are located in arguably less accessible locations. The proposed parking arrangement is in excess of the minimum provision under current guidance. Furthermore, it includes a valet system to ensure parking is well managed and comprises spaces available for both visitors and staff. Notably, a Staff Management Plan will be provided under legal obligation and used to reduce staff journeys via private vehicle to the site.

7.64 The proposed parking provision is in keeping with vehicle parking standards set out in Local Plan Policy ST6.

7.65 With regards to trip generation, as stated within the supporting Transport Statement, the proposed development will have little impact on peak flows. Furthermore, the proposed development is considered to represent a sensitive use which complements the local residential context.

7.66 The proposed development will include a number of sustainable transport initiatives to promote and encourage residents and visitors to utilise sustainable transport opportunities. This includes:

- Provision of a community minibus;
- Provision of a car club vehicle;
- Provision of Electric Car Parking Spaces;
- Mobility scooter parking;
- Cycle parking and shower facilities for staff;
- On-site GP services;
- Concierge parcel collection;
- Personalised Journey Planning services for residents; and
- Production of sustainable travel information for visitors.

7.67 The arrangements for transport and access within the proposed development are fully in accordance with relevant planning policies.

Summary of Planning Benefits

7.68 In addition to the proposed development's compliance with relevant planning policy set out above, the scheme will deliver the following range of planning benefits:

- **Benefits to future residents:** purpose built housing for the elderly, which allows people to live independently for longer. New homes will have associated support services to meet residents care and health needs as required. A significant benefit to resident wellbeing will be the sense of community created by the scheme and social activities available.
- **Benefit to the healthcare system:** In providing on-site care and enabling residents to live independently longer, the proposed development will reduce pressure on the healthcare system through prevention of health-related issues and by delivering health and social care efficiently within the home environment.
- **Benefits to the housing market:** there is a significant issue of elderly residents under occupying housing. Delivery of a new elderly housing development with integrated care facilities provides

elderly residents with an attractive option when looking to downsize. This helps to unlock family sized units back into the housing market.

- **Employment and economic benefits:** the proposed development will make a significant contribution to economic growth through increased expenditure from the proposed development alongside local job creation.
- **Architectural and townscape quality:** the design for the proposed development has been sympathetically developed to ensure it provides an appropriate contextual response for the local area, complemented by a high quality and rich landscape offer.

8.0 PLANNING OBLIGATIONS

8.1 Planning obligations will be secured under Section 106 of the Town and Country Planning Act 1990.

Draft Heads of Terms

8.2 It is proposed that the Section 106 Agreement will contain planning obligations which could secure the following (without prejudice):

- C2 definition/operation
- Travel Plan
- Staff Management Plan
- Works to existing crossovers
- Provision of Zebra Crossing
- Traffic calming and other necessary transport measures

9.0 SUMMARY & CONCLUSIONS

- 9.1 This Planning Statement has assessed the proposed redevelopment of land at 13-15A Alderton Hill against relevant planning policy contained within national planning policy and the EFDC Development Plan. It is considered that overall, the proposal accords in all material respects with the relevant policies.
- 9.2 The proposed elderly housing development with integrated care facilities comprises will introduce a new form of elderly residential care to the UK, providing large apartments for the elderly that are adaptable to the increased care needs of owners as they progress in years. Communal social and care facilities within the development are provided to keep residents physically, mentally, and socially stimulated and promote a longer period of healthy. On-site care provided by the applicant means that residents would not be required to move again due to deteriorating health.
- 9.3 It will meet an identified need within Epping Forest and would provide further variety within the local housing stock. The proposed development will have the potential to release a significant amount of family housing in the local area and result in benefits to local health care provision, as well as providing employment on-site.
- 9.4 The proposed scheme comprises an updated version of a scheme that was previously considered by Members of the Area Planning Sub-Committee South in April 2018. It has been carefully designed to ensure that there is an acceptable impact upon neighbour living conditions and the local transport network, while the biodiversity value of the Site will be enhanced.
- 9.5 The design of the proposed development has evolved through extensive pre-application consultation as well as public consultation to ensure the proposal addresses the needs of the local area and provides a positive physical contribution to it. This has included constructive and positive feedback from EFDC planning officers, which has contributed to the way in which the proposed development responds to comments received from Members of the Area Planning Sub-Committee South for the previous application.
- 9.6 In respect of the three strands of sustainable development (Economic, Social and Environmental), as defined in the NPPF, the proposed development would result in the following benefits:

Economic

- Generate 18 jobs on the site. Jobs would include a range of occupations including medical staff, facilities management, social care, hospitality and maintenance.

- Make a significant contribution to economic growth in the Borough through increased expenditure from new C2 uses.

Social

- Provision of elderly care housing has been shown to have a hugely beneficial impact on the health and wellbeing of residents living within them. Provision of specialist elderly housing with associated care helps to reduce the burden on the health and social care systems in two ways. Firstly, through the prevention of health-related issues, and secondly through delivering health and social care efficiently within the home environment.
- Addresses the issue of under occupied family housing by releasing these homes into the housing market, if the 89 C2 units proposed were taken up by residents currently living in family homes. Therefore, through the release of family housing this development can deliver more family housing compared to typical residential developments coming forward in Epping Forest.

Environmental

- Redevelopment of a developed site, in a highly accessible location, for a mix of uses, off-setting the need for greenfield development.
- A net increase in high quality trees across the site and a high-quality landscape strategy, as well as ecological improvement plans to significantly enhance the biodiversity value of the site.
- Trip generation that would occur outside the local peak hours ensuring a negligible impact to the highway conditions of the local area.

9.7 Overall, the proposed development is sustainable and in accordance with the provisions of the Development Plan, and as such there should be a presumption in favour of the proposed development being approved.

APPENDIX 1: EFDC LOCAL PLAN SUBMISSION VERSION (“LPSV”) STATEMENT OF COMPLIANCE

Introduction

Section 6 of this Statement states that, on the basis of legal advice provided by Town Legal LLP in January 2018, the applicant is of the view that the LPSV policies hold limited material planning weight as the LPSV has not been fully tested at an Examination in Public (“EiP”).

Notwithstanding the above, this Statement of Compliance has been prepared to illustrate how the proposed development would comply with relevant draft policies within the LPSV had they been robustly tested at EiP to the extent that they could be considered to carry material weight in the determination of planning applications.

This Statement of Compliance outlines and assesses the above scheme against the policies detailed in Epping Forest District Council’s Local Plan Submission Version (LPSV) 2017 which are relevant to these proposals. This statement concludes that this scheme is compliant with the LPSV policies and should be read in conjunction with the planning policy assessment detailed in Section 6 of the Planning Statement.

For the purposes of this Statement, the policies detailed in the LPSV have been summarised below.

Policy P 2 (Loughton)

Policy content: Policy P 2 identifies sites to be allocated for residential development. Part (xiv) of the policy includes site ref. LOU. R14 “Land at Alderton Hill – Approximately 33 homes” and Appendix 6 identifies the extent of the allocated site as including land at 13 to 19 Alderton Hill. Text titled ‘Development Requirements’ includes references to development proposals being required: to provide a financial contribution towards access management and monitoring of visitors to the Epping Forest SAC and protection of a nearby TPO tree (close to no. 19 Alderton Hill) should be ensured; design to take into account measures to avoid detrimental impacts on amenity of existing neighbouring properties; to consider mitigation of noise impacts from the adjacent London Underground Central Line through planting and use of building materials; and promote of sustainable transport modes given the site’s proximity to Loughton Underground Station.

Application response: The application proposal relates to land at nos. 13-15a Alderton Hill only. The draft site allocation confirms that the Council has accepted the principle of the application site’s redevelopment, but, prior to the determination of the previous application in April 2018, the Council received confirmation from the owners of nos. 17 and 19 Alderton Hill that they do not want their properties to form part of the draft allocation. This remains the case at the time of writing. The unavailability of the land at nos. 17 and 19 Alderton Hill is referred to

in the Council's April 2018 Committee Report for the previous application and confirms that draft Site Allocation ref. LOU.014 is undeliverable.

With regard to the development requirements set out at Appendix 6, the applicant has agreed to enter into a S106 Agreement to secure a financial contribution towards access management and monitoring of visitors to the Epping Forest SAC; the proposal will not adversely affect the nearby TPO tree; the scheme has been designed to avoid detrimental impacts on the amenity of existing neighbours; and an extensive scheme of mature tree planting is proposed along the southern boundary of the site next to the Central Line to mitigate the risk of noise impacts.

Policy H1 (Housing Mix and Accommodation Types)

Policy content: Policy H1 states that development will be permitted where the mix of new homes provides a range of accommodation types to meet local housing need including 'down-sizing options.' Supporting Paragraph 3.6 outlines that: *"Specialist accommodation for those with support needs, including for older people, will continue to play an important role in providing for those residents who currently, or will, need assistance. Consequently... new provision will normally be supported where appropriately located and designed."*

Application response: It was agreed with EFDC officers prior to the submission of the previous application that the principle of the use of the Site for extra-care accommodation is appropriate. There has been no change to this position since that time. The Site is located within 400m of Loughton town centre, which provides access to local amenities as well as Loughton Underground Station which provides links to Central London and Epping. Additionally, a key part of Elysian's business model is that residents get the benefit of extra longevity, higher degrees of health and wellness and dramatically reduced levels of loneliness due to the extra facilities in the community. Each site has 24-hour nursing staff and facilities, to provide care to all residents as well as the following on-site facilities:

- Medical Suite (inc. 24 hour nursing station)
- Lobby
- Restaurant
- Cafe / Bar
- Garden Room
- Wellness Suite containing Gym and Salon facilities
- Activity Room
- Private Dining
- Assisted Living Dining
- Courtyard Garden
- Communal roof terrace
- Community Minibus
- Car Club
- Scooter storage and charging facilities
- Guest room

In light of the above, it is considered that the proposed development is appropriate in this location, offering a high-degree of access to and from Loughton Town Centre whilst also delivering a number of on-site amenities.

Policy H2 (Affordable Housing)

Policy content: Policy H2 sets out that on development sites which deliver 11 or more homes or residential floorspace of more than 1,000sqm, the Council will require 40% of those homes to be for affordable housing on-site. On sites which do not accord with the aforementioned requirement, a financial viability appraisal (along with supporting evidence) must be submitted which complies with national or local guidance applicable at the time.

Application response: The applicant is engaged in on-going discussions with EFDC officers in relation to the potential for an appropriate contribution to be made towards the delivery of affordable housing in the District.

Policy T1 (Sustainable Transport Choices)

Policy content: Policy T1 states that development should minimise the need to travel, promote opportunities for sustainable transport modes, improve accessibility to services and support the transition to a low carbon future. In light of this, the Council will permit development where they integrate into the local transport network, provide safe, suitable and convenient access for all potential users including appropriate parking and servicing provision and do not result in an increase of traffic generation or compromise highway safety.

In addition to the above, development will be permitted where it mitigates its impacts on the local or strategic highway networks and London Underground Station infrastructure or provide a contribution towards the necessary highway improvement (subject to viability considerations).

Application response: The Site is located within close proximity of Loughton Underground Station providing good access to the London Underground train network and onwards towards central London or Epping. Such provision supports the needs of residents, visitors and staff for the development. A number of sustainable transport options are proposed to promote and encourage residents and visitors to use sustainable transport modes to and from the site to the wider area and beyond:

- Provision of a community minibus;
- Provision of a car club vehicle;
- Provision of Electric Car Parking Spaces;
- Mobility scooter parking;
- Cycle parking;
- Personalised Journey Planning services for residents; and
- Production of sustainable travel information for visitors.

Policy DM1 (Habitat Protection and Improving Biodiversity)

Policy content: Policy DM1 states that all developments should seek to deliver a net biodiversity gain in addition to protecting existing habitats and species. Developments should integrate biodiversity through the design and layout of the proposals. Ecological impacts should be quantified through the use of the Biodiversity Impact Assessment Calculator (BIAC) and demonstrate a net gain in ecological units.

Application response: The Council has confirmed that the draft policy is still being developed and is not ready for use in planning applications. In addition, officers have confirmed that due to the absence of any sensitive biodiversity/ecology related designations being relevant to the Site, this policy would not be relevant.

Policy DM2 (Epping Forest SAC and the Lee Valley SPA)

Policy content: Policy DM2 outlines that the Council expects all relevant development proposals to assist in the conservation and enhancement of biodiversity, character, appearance and landscape setting of the Epping Forest Special Area of Conservation (“SAC”) and the Lea Valley Special Protection Area (“SPA”). Specifically, detailed planning applications in Loughton will be required to make a financial contribution toward access management and monitoring of visitors to the Epping Forest SAC.

Application response: The Site lies in close proximity to the Epping Forest SAC and it is acknowledged that as the site falls within the ‘sphere of influence’. With this in mind, a financial contribution towards access management and the monitoring visitors to the Epping Forest SAC will be included as part of a Section 106 Obligation, the amount of which is to be agreed with officers.

Policy DM9 (High Quality Design)

Policy content: Policy DM9 sets out the design standards for the following areas of development:

- Landscaping;
- Public Realm;
- Connectivity and Permeability; and
- Privacy and Amenity.

Application response: The design of the proposed development is of the highest standard for the new building and the public realm. It is sensitive to the distinct architectural context of the surrounding area complementing the homes in the area whilst optimizing usability. The proposed design has also taken into consideration neighbouring privacy and amenity as well as future occupants of the building.

Policy DM11 (Waste Recycling Facilities on New Development)

Policy content: Policy DM11 requires all development which generates waste to deliver on-site provision for general waste, the separation of recyclable material and organic materials for composting and must provide

adequate internal and external storage space to manage the volume of waste arising from the site and provide should provide safe access for occupiers and collection operatives including vehicles. Storage facilities must be screened and located to avoid nuisance and adverse impacts on the visual or other amenity from neighbouring occupiers.

Application response: A Waste and Servicing Management Plan prepared produced by WSP Parsons Brinckerhoff accompanies this application. It demonstrates that appropriate provisions are proposed for the operation of the development. This includes provision for the storage of waste and recycling materials. In addition, the proposal includes measures to provide access for the disposal of waste from the Site.

Policy DM15 (Managing and Reducing Flood Risk)

Policy content: Policy DM15 requires proposals for new development to demonstrate that they avoid and reduce all forms of flooding and do not increase risk elsewhere.

Application response: The site is located within Flood Zone 1 which states that there is a less than 1 in 1000 annual probability of river or sea flooding. Potential sources of flooding have been investigated and mitigated as appropriate through suitable design measures. An Outline Drainage Strategy has been developed to manage surface water within the Proposed Development, taking into account the potential climate change impact. Foul water discharge has also been considered as part of the development proposals. Thames Water have confirmed via correspondence that the existing infrastructure can accommodate flows from the proposed development.

Policy DM16 (Sustainable Drainage Systems)

Policy content: DM16 requires all new proposals to manage surface water as close to its source as possible while incorporating Sustainable Urban Drainage Systems (SUDs) into new development. This should include the provision to reduce water flow to the 1 in 1 greenfield run off rate and provide storage for all events up to and including 1 in 100 year critical storm event. For all brownfield development, proposals should achieve a 50 per cent reduction in the existing site run-off rate for all events.

Application response: The Site is located in Flood Zone 1, however is located in a Critical Drainage Area. The Lead Local Flood Area (LLFA) – Essex County Council have requested that a betterment on site in terms of surface water run-off rates. The scheme will restrict surface water on site through the use of attenuation located beneath the surface of the landscaped courtyard, to the equivalent of greenfield runoff rates. The attenuation storage has been purposefully designed to store as a minimum 1:100 year +20% climate change event. It is therefore considered that the proposals accord with draft policy DM16.

Policy DM21 (Local environment impacts, pollution and land contamination)

Policy content: Policy DM21 requires that the residual local environmental impact of new development do not lead to unacceptable impact on the health, safety, wellbeing and amenity of existing and new users or occupiers of the development site, or the surrounding land.

Application response: The proposal has considered the local environmental impacts as part of pre-application process in the Ecology Report and Health Impact Assessment report submitted in support of the application. The proposed development will benefit the health and wellbeing of its residents and its impact on the amenity of nearby land users have been carefully considered and mitigated through changes to the massing of the proposed building and the inclusion of a mature landscape scheme around the perimeter of the Site.

The potential land contamination risks are considered to be low, and Epping Forest District Council's officers have also confirmed that no evidence of contaminating activities have been found based on their desk-study information.

Policy DM22 (Air Quality)

Policy content: Policy DM22 requires mitigation measures to be incorporated into all new developments which will be determined by its scale, location and potential to cause air pollution as well as its presence in relation to sensitive receptors in the locality.

Application response: An Air Quality Assessment has been produced by WSP Parsons Brinckerhoff which assesses the construction effects on air quality. The report concludes that with the appropriate best practice mitigation measures set out within the Air Quality Assessment, there is likely to be an insignificant effect from dust-generating activities on site during construction.