# **Loughton Residents Association Plans Group**



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The Head of Planning & Economic Development EFDC Civic Offices Epping Essex CM16 4BZ

Dear Sir

### **EPF 2115 18 13-15A Alderton Hill**

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.

\*\*\* (Amendments to the previous proposal include changes to the front façade facing Alderton Hill, a reduction in the level of massing to the north of the site, a reduction in the number of units proposed by 15% from 106 to 89, and creation of a new zebra crossing along Alderton Hill. \*\*\*

We object to this application, which would be wholly out-of-character with its surroundings in density, design and height.

**Use category?** We understand that the flats are intended for elderly people not needing care, who then may need care at a later stage, which will be provided onsite. We therefore consider that the Use is C3 and not C2, and the application should be rejected outright on these grounds, which appear to us to be intended to avoid the requirements for affordable units which would otherwise apply.

## Out-of-character.

However, leaving that point aside and considering the design of the buildings, Alderton Hill is characterised by large houses in large gardens, in single occupation and of 2 or 3 storeys, and set back from the road. Blocks\* of up to 5 storeys across the width of three ordinary houses, are therefore wholly out-of-character.

\*We wholly disagree that joining the two elements by a single-storey glazed lightwell in any way breaks the massing of the built form or gives the perception of two separate 'houses' on the Site, as the rear 5-storey block will be clearly visible above the lightwell.

In no way does the proposal form any sort of suitable transition between the domestic dwellings and the McCarthy & Stone site at the foot of the hill, as it is significantly higher and bulkier than any of the nearby properties.

## Lack of information on local supply of similar accommodation.

The application gives considerable statistical detail on the potential *demand* for retirement flats but contains no information whatsoever about the existing *supply* – in isolation the information provided is therefore useless.

# Impossibility of shielding the block by landscaping.

Given the height of the proposed buildings, there is no way in which these can be shielded from Alderton Hill by landscaping, as even semi-mature trees would take many years to reach a suitable size.

The state of repair of the existing dwellings is of course irrelevant – they could easily be repaired or replaced with dwellings far more in keeping.

The parking arrangements appear totally inadequate – in particular, it seems likely that visitors will park in neighbouring roads, adding to the already high parking pressure there, rather than leaving vehicles to be parked in the undercroft and then have to wait for their return when they wish to leave. (The assertion that the amount of parking has been modelled on schemes elsewhere is of no value without any information about the location of the sites and whether or not they involved valet parking).

See also our comments below on bus and Tube services, which show that *for a C2 usage* the site is not well-provided with public transport.

# The new Local Plan.

Appendix 1 to the Planning Statement purports to justify the development in relation to the new Local Plan approved by the Council last December and awaiting its Examination in Public. Strangely the Appendix fails to mention that 13-15A forms part of a site listed in the Plan for 33 homes over 13 – 17 Alderton Hill. We shall be asking for this to be removed from the Plan, as numbers 15 and 17 are not available for development, but this clearly demonstrates that the current proposal is wildly in excess of what was envisaged by the Council when preparing the Plan.

### **Bus & Tube services.**

Para 4.13 of the Planning Statement states "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."

However, the station is actually over ½ mile from the station and the bus stops, a considerable distance for the elderly and infirm. The bus stops on Alderton Hill are some 30m away, up what is a fairly steep hill. As the application is for C2 usage, we do not consider that this constitutes suitable provision.

### Public consultation.

Please note that we did not bother to comment on the applicant's public display because there was no possibility of them taking any note of our comments, which would have been as above.

# If the District Council is minded to approve the application,

However, if the District Council is minded to approve the application, we ask for conditions as follows:

• to provide suitable landscaping, including semi-mature trees which will we hope eventually

grow to a size where they will partially screen the buildings

- to restrict demolition and building work hours to the Council's usual standard hours
- to require wheel-washing equipment on-site.

Yours faithfully

David humell.

David Linnell

for Loughton Residents Association Plans Group