

By hand a.m. 29.1.1



**Epping Forest
District Council**
www.eppingforestdc.gov.uk

EPPING FOREST DISTRICT COUNCIL NEIGHBOURHOODS	
REC'D	29 JAN 2018
ACK
REFERRED TO



Representation form for Submission Version of the Epping Forest District Local Plan 2011-2033 (Regulation 19 publication)

This form should be used to make representations on the Submission Version of the Epping Forest District Local Plan which has been published. Please complete and return by 29 January 2018 at 5pm. An electronic version of the form is available at <http://www.efdclocalplan.org/>

Please refer to the guidance notes available before completing this form.

Please return any representations to: Planning Policy, Epping Forest District Council, Civic Offices, 323 High Street, Epping, Essex, CM16 4BZ

Or email them to: LDFconsult@eppingforestdc.gov.uk

BY 5pm on 29 January 2018

This form has two parts –

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Please attach any documents you wish to submit with your representation

Part A

1. Are you making this representation as? (Please tick as appropriate)

a) Resident or Member of the General Public or

b) Statutory Consultee, Local Authority or Town and Parish Council or

c) Landowner or

d) Agent

Other organisation (please specify)

2. Personal Details**3. Agent's Details (if applicable)**

Title	<input type="text" value="REDACTED"/>	<input type="text"/>
First Name	<input type="text" value="REDACTED"/>	<input type="text"/>
Last Name	<input type="text" value="REDACTED"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value="REDACTED"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="private citizen"/>	<input type="text"/>
Address Line 1	<input type="text" value="REDACTED"/>	<input type="text"/>
Line 2	<input type="text" value="REDACTED"/>	<input type="text"/>
Line 3	<input type="text" value="REDACTED"/>	<input type="text"/>
Line 4	<input type="text" value="REDACTED"/>	<input type="text"/>
Post Code	<input type="text" value="REDACTED"/>	<input type="text"/>
Telephone Number	<input type="text" value="REDACTED"/>	<input type="text"/>
E-mail Address	<input type="text" value="REDACTED"/>	<input type="text"/>

Part B – If necessary please complete a separate Part B form for each representation

**4. To which part of the Submission Version of the Local Plan does this representation relate?
(Please specify where appropriate)**

Paragraph Policy Policies Map

Site Reference Settlement

**5. Do you consider this part of the Submission Version of the Local Plan:
*Please refer to the Guidance notes for an explanation of terms**

- a) Is Legally compliant Yes No
- b) Sound Yes No

If no, then which of the soundness test(s) does it fail*

Positively prepared Effective

Justified Consistent with national policy

- c) Complies with the duty to co-operate Yes No

6. Please give details of why you consider the Submission Version of the Local Plan is not legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance, soundness of the Local Plan or compliance with the duty to co-operate, please also use this box to set out your comments

The plan is unsound in that the target of 1021 dwellings in Loughton results in unsuitable sites being proposed for high density housing development. In particular I refer to site LOU R1 (Loughton London Underground Station car park (Appendix 6) which has a development area of 1.62 Ha for c.165 dwellings with net density 114 DpH.

Commuter car parks are not ideal sites for housing redevelopment. Some of the disadvantages will not easily be overcome. But some reduction in number and hence density of dwellings would allow a safer and healthier environment for new residents and better integration of the building(s) in the townscape and with nearby residential areas.

a) Housing densities: Section I ii of POL SP3 states that densities above 50 DpH may be permissible in urban areas and near transport links. It makes no reference to densities of more than double that baseline (of which there are several proposed in the district) or to any special planning considerations when such high densities result in very tall buildings. The Plan should include a policy on tall buildings in suburban, residential areas.

b) Area available for housing on site LOU R1: Parts of the mapped area may be unfeasible for residential building..... (Continue on a separate sheet if necessary) See separate sheet

EFDC Submission Local Plan – Representation from Dorothy Paddon – IG10 4DX:

Part B Q6 continuation

b) Area available for Housing on Site LOU R1: Parts of the site may be unfeasible for housing:-

A long narrow strip to S: Store access and short stay parking to N which must be retained: A row of trees with TPO to E. If these areas are included in the 1.62 Ha but 165 flats built only on the central area, then density will be even greater.

c) Height of building: It is not clear how many storeys may be needed to provide 165 flats. Commuter parking spaces have to be re-provided; this may involve an extensive undercroft, adding to potential height. High housing densities, more typical of city locations than of suburbs, generally involve tall, multi-storey buildings; but SP3 xi of the Plan undertakes to *“maintain and enhance the important features, character and assets of existing settlements”*. The character of Loughton, including the Debden area, is of residential buildings mostly of 1-3 storeys; the few exceptions are widely regarded as planning blunders. To the immediate West of the site are established residential areas of 1-2 storey houses. Development Requirements for any taller buildings on Site LOU R1 should state that overlooking and overshadowing of those dwellings must be avoided.

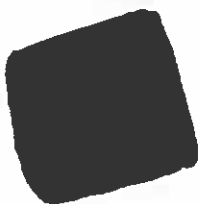
d) Residents' cars: No new parking spaces for the 165 dwellings are to be provided. Whilst this accords with national policy, realistically many new residents will own cars, and therefore will attempt to park them in nearby streets. On-street parking in the town is under great pressure, and widely regulated. More illegal parking will result from this.

e) Residential amenity: Section Hv of SP3 undertakes to *“provide high quality and imaginatively designed homes with gardens or access to useable and accessible amenity space*” This requirement is not mentioned in the Development Requirement for Site LOU R1. With the densities proposed, and other essential uses on the site, it is unlikely that any significant, useable amenity space can be provided.

f) Access for Service and Emergency Vehicles: Because of high density of housing and resulting competition with other functions on site, it may be difficult to ensure essential access for service & emergency vehicles to every dwelling.

g) Environmental impacts: While mitigation of noise from the railway is a requirement, there will be noise also from constant movement of vehicles on the Station Approach. There is no mention of air quality, as it affects residents' health, in this area of slow moving and stop-start motor traffic. Essex Air has Loughton under review for more AQMAs (air quality monitoring areas). The Plan appears to express more concern for the trees of Epping Forest than for the lungs & hearts of the district's residents.

h) The development phase: The site and the adjoining Station Approach are in heavy day long use. Demand for commuter parking, and other essential traffic movement nearby, will not diminish during construction. Development Requirements must include adequate temporary re-provision for these functions.



7. Please set out what change(s) you consider necessary to make the Submission Version of the Local Plan legally compliant or sound, having regard to the test you have identified in the question above (Positively prepared/Justified/Effective/Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the Submission Version of the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The final Plan should reduce the overall number of dwellings proposed for Loughton, including for sites LOU R1 and LOU R2.

The Plan should rule out housing densities greatly in excess of the stated baseline of 50 DpH (POL SP3) as incompatible with the character and townscape of suburban areas and with the environmental quality of dwellings provided. In particular the exceptionally high densities proposed for sites LOU R1 (114 DpH) and LOU R2 (129 DpH) must be considerably reduced.

The Plan should clarify policy on tall, multi-storey buildings in suburban areas of the district in order to be compatible with POL SP3 xi of the Plan.

POL DM22 of the Plan should include reference to existing, local air quality as it will affect future residents of proposed housing developments, and not simply the impact of new developments on existing residents and the Forest.

(Continue on a separate sheet if necessary)

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the hearings

Yes, I wish to participate at the hearings

9. If you wish to participate at the hearings, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

10. Please let us know if you wish to be notified when the Epping Forest District Local Plan is submitted for independent examination (Please tick)

Yes No

11. Have you attached any documents with this representation?

Yes No One supplementary page only.

Signature:



Date: