



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="Mr"/>	<input type="text" value="Mr"/>
First Name	<input type="text" value="Luke"/>	<input type="text" value="Michael"/>
Last Name	<input type="text" value="Cadman"/>	<input type="text" value="Calder"/>
Job Title (where relevant)	<input type="text" value=""/>	<input type="text" value="Director"/>
Organisation (where relevant)	<input type="text" value=""/>	<input type="text" value="Phase 2 Planning Ltd"/>
Address Line 1	<input type="text" value=""/>	<input type="text" value="250 Avenue West"/>
Line 2	<input type="text" value=""/>	<input type="text" value="Skyline 120"/>
Line 3	<input type="text" value=""/>	<input type="text" value="Great Notley"/>
Line 4	<input type="text" value=""/>	<input type="text" value="Braintree"/>
Post Code	<input type="text" value=""/>	<input type="text" value="CM77 7AA"/>
Telephone Number	<input type="text" value=""/>	<input type="text" value="01376 329059"/>
E-mail Address	<input type="text" value=""/>	<input type="text" value="mcalder@phase2planning.co.uk"/>

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 Ref: LOU.R8 (Appendix 6)

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

See seperate sheet

(Continue on a separate sheet if necessary)

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.

Please see separate sheet.

(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:

N/A

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

Signature:

Date:



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250 Avenue West
Skyline 120
Great Notley
Braintree
Essex
CM77 7AA

01376 329059
office@phase2planning.co.uk
www.phase2planning.co.uk

Epping Forest District Draft Local Plan 2018 Submission Version Response on Behalf of Loughton High Road (256) Limited Relating to Land West of High Road, Loughton Site Allocation LOU.R8

Introduction

These representations to the Submission Draft Local Plan are submitted on behalf of Loughton High Road (256) Limited, who have an interest in the proposed site allocation LOU.R8: land to the west of High Road, Loughton. This site was previously identified in the 2016 consultation Draft Local Plan as an allocation for approximately 30 dwellings (ref: SR-0834) is now identified as delivering approximately 29 dwellings (ref: LOU.R8). It is proposed that these dwellings can be delivered within the five year period.

The following sections will, in addition to outlining our support for the allocation of LOU.R2, also respond to matters raised within the Submission Draft Local Plan itself.

Policy P2 Loughton (viii) LOU.R8 Land West of High Road – Approximately 29 homes

Q7: We support the assertion that site viii LOU.R8 can deliver 29 dwellings. Redevelopment proposals for this site are advanced: a pre-application meeting took place in April 2017 which led to further refinement of the scheme and the submission of a planning application in December 2017 (LPA ref: EPF/3210/17). This application proposes the demolition of existing buildings and construction of 29 one and two bedroom retirement apartments, with associated access, amenity space, landscaping and parking.

Policies Map: 5.3 Site Allocations in Loughton

Q7: For the reasons set out in our response to Policy P2 and Appendix 6: Site Specific Requirements for Site Allocations (LOU.R8), the allocation of land to the west of High Road, Loughton (site ref: LOU.R8) is supported.



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Appendix 6: Site Specific Requirements for Site Allocations (LOU.R8)

Q7: This identifies that the site on the west side of High Road Loughton, which falls within the control of our clients, Loughton High Road (256) Limited, has an approximate net capacity of 29 dwellings. This is consistent with our assessment of the site and the current planning application for 29 retirement apartments, which has been informed by pre-application advice from officers. It is submitted that this site should be included within the Council's five year supply of housing as it is fully deliverable within that period.

The site address is referred to as "Car park, west of High Road, Loughton, Essex", however this should be amended to reflect the text within the main body of the Submission document, which refers to this site as "land west of High Road, Loughton" as the site is a former Royal Mail delivery office and not a car park.

Appendix 6 of the Local Plan also provides commentary in relation to development requirements for each allocated site and our response in relation to this commentary is set out below:

Ecology: The Council makes reference to requiring development proposals to make a financial contribution to access management and monitoring of visitors to the Epping Forest Special Area of Conservation in accordance with measures identified in the Action Plan developed and agreed with Natural England. Loughton High Road (256) Limited has no objection to this requirement, which has been applied to development sites.

Infrastructure: The comments regarding the location of the site being sustainable with good public transport accessibility are supported. A large area of Loughton, including Loughton underground station, lie within easy walking distance and there are bus stops within 100m of the site. There are wide, well-lit footways provided on both sides of the High Road which link the site to a range of facilities and destinations, including local bus stops, rail stations and local shops and amenities.

The current planning application proposals for the site make provision for a reduced level of car parking, which falls slightly below Essex County Council's minimum standards. However, the Submission Draft Local Plan recognises that reduced car parking in sustainable locations will be supported in Policy T1 (Sustainable Transport Choices), with the accompanying text stating that the Council believes that there are opportunities to take more locally focussed approach to car parking. In light of the accessible location, coupled with the use of the site for one and two bedroom retirement apartments (where the age of the occupants means that reliance on the private car is likely to be lower than average), this reduced car parking provision is considered to be acceptable. It is proposed that covered parking for mobility scooters will also be provided as part of the development, providing a means of accessing local facilities and services for those less able to walk. It is anticipated that the Council's officers will accept reduced parking in light of the location of the site and the proposed use.

However, given the nature of the proposals at the Site, Loughton High Road (256) Limited are not of the view that car club/car sharing or pooling arrangements on this site are appropriate or indeed required. This would



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also reduce the number of spaces on site for future residents to utilise. We therefore request reference to this should be deleted and should not form part of the planning application proposals.

Loughton High Road (256) Limited also object to the requirement for contributions to the implementation of Controlled Parking Zones in the vicinity of the site. The proposals deliver 20 on site car parking spaces, demonstrated as being more than sufficient given the retirement/age-restricted nature of the proposed residential use. In exceptional circumstances, where there is insufficient parking available on site, visitors can make use of the pay and display town centre car parks which lie approximately 400m away on the High Road. Furthermore, given the town centre location, there are existing parking restrictions within the vicinity of the site. It is therefore requested that reference to contributions to the implementation of Controlled Parking Zones is deleted and should not form part of the planning application proposals.

Q8: In order to make this part of the Plan sound, the text should be amended as follows:

Infrastructure This site is identified as being within Loughton Town Centre which is considered a sustainable location with good public transport accessibility. To promote sustainable transport modes and encourage active transport, development proposals for residential development should limit the provision of on-site residents' car parking to that required to service the essential needs of the development. ~~Provision should be made on site for car clubs/car sharing or pooling arrangements, visitor parking and blue badge holders. Contributions will be sought for implementing Controlled Parking Zones in the vicinity of the site.~~

The text proposed for deletion is not justified or effective. This amended text will provide the flexibility required to ensure delivery of the development proposals and will not be affected by unnecessary controls. It will also remove unnecessary financial contributions and burdens on the proposals.

We trust the above comments will be taken in to account as the draft Local Plan is progressed through Examination.