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29 January 2018

Local Plan Regulation 19 Representation  
Planning Policy Team  
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Dear Sir or Madam

**EPPING FOREST LOCAL PLAN: DRAFT SUBMISSION VERSION DECEMBER 2017**

On behalf of our Client, Elysian Residences, we wish to make representations pursuant to the Draft Epping Forest Local Plan Submission Version 2017. Our Client holds an interest in the development site at 13-15A Alderton Hill, Loughton and has a role as the Applicant for the live planning application (████████████████████) on the aforementioned site.

Our Client's business is to create new elderly communities with a high quality integrated care offer. This operating model is new for the UK market but well established in the USA and most other OECD countries. A primary focus of the model is the provision of accommodation for elderly people which is designed to keep residents healthy and active. Each site benefits from 24-hour nursing staff and facilities, providing care to all residents in addition to communal facilities to keep residents active, social engaged and healthy. The provision of this type of accommodation brings with it significant benefits including the promotion of healthy and active lifestyles for the elderly; a reduction of the reliance national health resources; and the release of often under-occupied family homes into the housing market. Accordingly, it is strongly encouraged and supported by planning policy across the Country.

The representations are set out below to follow the structure of the plan. We have also provided commentary on the draft site allocation which incorporates our Client's site highlighted above.

We would be happy to arrange a separate meeting to discuss these further.

**1. Vision for the District**

Our Client strongly supports a vision which promotes the provision of a mix of homes to meet local need (ii) and an objective to promote development in the most sustainable locations (iv).

The delivery of specialist housing for elderly people is essential in a society where the population is living longer. There are profound benefits for promoting this type of housing including the release of existing housing stock and notably the benefits to health and associated resources for

individuals and society as a whole. Our Client therefore strongly supports an approach which supports the delivery of housing for the elderly. This is consistent with Planning Practice Guidance (2015) which states that:

*“older people have a wide range of different housing needs, ranging from suitable and appropriately located market housing through to residential institutions (Use Class C2). Local planning authorities should count housing provided for older people, including residential institutions in Use Class C2, against their housing requirement. The approach taken, which may include site allocations, should be clearly set out in the Local Plan.”*

In Epping Forest where urban settlements complement the historic and natural environment, it is essential development is promoted on sustainable sites. This includes sites which have been previously developed and benefit from good access to public transport. Meeting development need through such an approach will minimise the adverse impact on the natural and historic environment, maintaining the Metropolitan Green Belt and promoting public transport use.

## **2. Local Plan Objectives**

The themes cited above appear within the draft policy wording for the plan’s objectives. As above, our Client strongly supports policy which seeks to:

- Encourage the use of previously developed land (i); and
- Ensure that new homes provide an appropriate mix of sizes and types including “supported housing for elderly people” (ii);

## **3. Policy SP 1 Presumption in Favour of Sustainable Development**

Our Client supports the draft plan’s objective for the Council to take a positive approach to taking a presumption in favour of sustainable development for schemes which improve the economic, social and environmental condition in the district.

## **4. Policy SP 2 Spatial Development Strategy 2011-2033**

The approach to address housing supply issues is supported generally by our Client. It should be acknowledged that the delivery of elderly care communities such as those promoted by our Client have a profound effect on local housing markets through the release of often under-occupied housing stock and the provision of higher density homes for the elderly on accessible sites.

## **5. Policy SP 3 Place Shaping**

It is essential to meet housing targets and the sustainable development agenda through high density development if focussed in locations with good public transport accessibility, including town centres such as Loughton. The approach as set out in part I (i) and (ii) of the policy is therefore supported.

## **6. Policy H1 Housing Mix and Accommodation Types**

The draft policy approach promoting development which includes a range of house types and sizes to address local need including for ‘down-sizing’, is strongly supported. Paragraph 1.19 of the draft plan recognises a growing number of family sized households in the district. Our

Client's model provides accommodation for the elderly who are often under occupying large family homes in the area. Their model therefore ensures the release of family housing into general housing stock providing for the needs of growing household numbers.

## **7. Policy H2 Affordable Housing**

In general, our Client supports an approach which promotes the delivery of affordable housing. Affordable housing is essential to contribute towards achieving an appropriate mix of homes in the district. Contributions towards affordable housing should be sought where it is appropriate to do so. We note that supporting text to the draft policy (paragraph 3.10) highlights that the primary opportunity for contributions towards affordable housing can be achieved through on-site provision as part of private sector housing development. Our Client supports this position.

Further supporting text to the policy (paragraph 3.14) reports that the evidence underpinning the draft Local Plan:

*“suggests that the provision of 40% of affordable homes on sites of 11 or more homes (including self-contained units in specialist accommodation) would provide the most appropriate balance between achieving a meaningful proportion of affordable homes, as well as accommodating any CIL contributions, to support both the delivery of affordable homes and the necessary strategic infrastructure subject to individual site viability.”*

We observe that there is no definition of 'specialist housing' in this instance and one should be included for understanding accordingly. We have also assessed on behalf of our Client the Dixon Searle Partnership viability evidence which the plan's policies are based upon. Notably, in both their Stage 1 and Stage 2 reports Dixon Searle make a clear distinction between elderly housing which is 'residential led' and falls under Use Class C3 and care facilities which are 'care-led' and fall under Use Class C2.

In consideration of this, Dixon Searle report that elderly housing which falls under a C3 use class is generally *“no less viable than market housing where they are commercially approached developments offering apartments or similar for market sale as the primary driver.”*

Where the proposal relates to a C2 use class then Dixon Searle report that *“the viability picture may be more marginal”* and therefore a contribution towards affordable housing from developments in a C2 use class cannot be supported.

It is clear from the supporting Dixon Searle reports that the *“including self-contained units in specialist accommodation”* referred to in paragraph 3.14 should be a reference to anything that falls within Use Class C3 and not Use Class C2. This is in recognition of the clear differences between the financial viability of the delivery of each use.

It is critical for a sound interpretation of the draft plan that Policy H2 is consistent with the evidence base and recognises the distinct differences of C2 and C3 use classes when it concerns financial contributions, including contributions towards affordable housing.

We propose the draft policy is accompanied by a definition of 'specialist accommodation' to ensure that a contribution towards affordable housing will only be sought in appropriate circumstances where financial capabilities allow and specifically where C3 use classes are involved. This will ensure the policy is wholly consistent with the draft plan's evidence base.

We propose the following definition for ‘specialist accommodation’ to be included within the draft plan:

*Residential accommodation for those with housing support needs and where the accommodation falls under a C3 use class.*

## **8. Policy DM 9 High Quality Design**

Our Client fully supports an approach to promote high quality design which relates to its context and makes a positive contribution to local placemaking. It is essential development is designed in a sustainable manner whilst taking appropriate reference from the local character of areas.

## **9. Vision for Loughton**

Our Client strongly supports the vision for Loughton as a thriving major town in the district. Loughton benefits from excellent public transport accessibility and offers a range of amenities to serve the local area.

The focus on ensuring development is promoted in sustainable locations is essential to meeting the identified housing targets whilst conserving the local precious and protected greenspaces. The allocation of site LOU. R14 incorporates our Client’s site and the principle of its development is strongly supported, this is discussed in greater detail below.

## **9. Allocation LOU. R14**

As set out in Appendix 6 to the draft plan, allocation LOU. R14 refers to ‘Land at Alderton Hill’ and extends to Nos. 13-19 Alderton Hill which includes our Client’s site at Nos. 13-15A Alderton Hill.

Our Client strongly supports an allocation which has regard to the draft plan as a whole. The principle of development of an existing site close to the underground station is highly sustainable and in accordance with the strategic objectives of the draft plan.

Whilst the promotion of residential uses on the site is supported, the allocation should also recognise the need, as emphasised in the draft plan, for a mix of types of residential accommodation including elderly housing. As aforementioned, such uses deliver significant public benefits including the promotion of healthy and active lifestyles for the elderly; reduced pressure on national health resources; and the release of often under-occupied family homes into the housing market. The promotion of a flexible approach to the delivery of residential uses on the site will therefore provide the best opportunity to achieve the draft plan’s objectives and wider aspirations.

The requirement for the allocation to promote sustainable transport forms is also supported.

We look forward to receiving acknowledgement of receipt of these representations and request that we be notified of further opportunities to comment on the draft plan accordingly. If you require further information or clarification on the representations above then please contact Harry Manley at this office.

Yours sincerely,

