

**EPPING FOREST DISTRICT COUNCIL**

**Local Plan: Submission Version 2017**

**Consultation: December 2017 – January 2018**

Comments and Objections

**Loughton – Housing Sites**

Relevant policies quoted from the Local Plan:-

**Policy H1**

Development will be permitted where the mix of new homes includes a range of house types and sizes to address local need

**Paragraph 3.9**

“ . . . the number of new affordable homes required for the period 2016-2033 in Epping Forest District was 2,851 homes. This equates to some 178 homes per annum

**Policy H2**

On development sites which provide for eleven or more homes . . . the Council will require 40% of those homes to be for affordable housing provided on the site

**Paragraph 4.76**

A core principle of planning is to always seek to secure high quality design and a good standard of amenity. It notes that design policies should concentrate on guiding the overall scale, density, massing, height, landscape, layout, materials and access of new developments in relation to neighbouring buildings and the local area

**Policy DM10**

All new housing development is required to meet or exceed the minimum internal space standards set out in National Prescribed Space Standards.

Ground floor family housing must provide access to private garden/amenity space

**Policy DM5**

Enhance the public realm and designated and undesignated open spaces within built up areas

**Paragraph 4.44**

Open space provision is critical to the physical and mental health of our communities

**Paragraph 4.46**

National Planning Policy defines open space as all open space of public value

A major element of housing demand (as opposed to need) arises from Loughton being an extremely pleasant place to live and has first class access to the City of London. For this reason, most obvious housing sites have been developed in recent years, leaving only modest pockets of potential development sites, with the possible exception of the two underground station car parks and the Borders Lane field, which are significant sites.

Loughton is constrained by Epping Forest to the west and north, the Roding Valley flood plain (also an SSSI) to the east and essential Metropolitan Green Belt 'wedges' separating it from Theydon Bois, Buckhurst Hill and Chigwell. Other major settlements in the District have the dubious ability to colonise modest parts of the Green Belt to accommodate, in part, their Plan allocations of dwellings. Hence the 1,000 plus dwellings proposed for Loughton are to be crammed into every open space in the town.

Strong objections are raised to the numbers stated in the Plan as undoubtedly to accommodate them all will lead to the changing character of our town, in direct conflict with the foregoing policies quoted from the Local Plan. The majority of the development sites identified in the Plan for housing are to be developed at far greater densities than exist at present and greater than the level specified in the Plan. For example:=

**LOU R1 Loughton Underground Station**

Awkward shaped site squashed between Underground line, neighbouring 2-storey dwellings and a car park – and a host of features to retain, yet 165 dwellings to be provided at more than twice the density allowed elsewhere.

**LOU R2 – Debden Underground Station**

Less awkward site yet again squashed between the Underground line and 2-storey dwellings, yet 192 dwellings to be provided at two and a half times the density allowed elsewhere.

**LOU R4 – Borders Lane Field**

The Plan requires 217 dwellings to be provided at over twice the density allowed elsewhere.

**LOU R10 – Station Road**

Two existing dwellings to be demolished and 12 to be built.

**LOU R14 – Alderton Hill**

Five dwellings to be demolished and 33 to be built.

It is difficult to see how these developments will satisfy policies regarding height, scale, massing, density, materials and character when they can only be built upwards at densities not seen before in the town.

It is noted that sites near Underground stations and in the town centre are subject to a requirement limiting the provision of residents' car parking to " . . . that required to service essential needs of the development (however they are measured). Provision should be

made on site for car clubs/car sharing or pooling arrangements, visitor parking and blue badge holders.” This applies equally for a development of 192 dwellings and one of nine dwellings. Of the total of 1,000+ dwellings, 698 are subject to the foregoing parking requirements. This is quite unrealistic. Any of the incoming occupants of the dwellings can choose to own a car, yet there is to be no dedicated parking to in excess of two-thirds of the new dwellings in the town, leading to further congestion on the highways.

Parking in Loughton has already reached saturation point throughout the working week, arising from:

Commuters ‘railheading’ to Underground stations from a wide area

People working in Loughton or using its facilities

People shopping locally. The vitality of the centre depends on convenient parking so that any reduction or additional pressure in town centre spaces will deter shoppers. In the age of internet shopping such setbacks can accelerate a centre’s decline.

Residents without on-site parking space are in competition for on-road space. There is already a backlog of residents parking schemes/reserved facilities.

## **Infrastructure**

The Draft Plan glosses over current shortfalls in essential services:

The Central Line, already under pressure, is unable to expand capacity further.

Roads are poorly maintained and heavily congested for many hours daily.

Schools are already operating at full capacity

Health and Social services struggle with tight budgets and continually growing demand. No indication is given in the Plan as to how the extra residents will be serviced.

The extra residents will create yet more traffic, further deteriorating air quality on and near the highways.

No sites are identified in the Plan to accommodate schools, playing areas, clinics, surgeries, etc, to service the increase of some 2,500 extra residents in the town

## **Viability**

Viability has become a major criterion in planning decisions, prioritising landowner and developer at the expense of social and environmental needs;

The biggest financial variable in development is the site value, which is dependent upon

what the planning authority will allow to be built. Should the authority insist from the outset on its stated proportion of affordable homes, the developer must make due allowance when purchasing the site. At present it appears that developers pay high prices for sites knowing that they can claim it to be unviable to provide the stated proportion of affordable housing. Development is geared towards market sector housing, which fewer and fewer local residents can afford, helped in part by loose interpretation of the viability test, which reduces the number of affordable homes being provided. The result is an expanding population in the town without adequate provision for known local needs.

The Council should adopt a policy when selling any council-owned sites for housing development to introduce a covenant or other legal agreement for the full requirement of affordable homes to be met. This, in addition to the planning laws under which the viability card is invariably played. It would be unforgivable for the full amount of affordable housing not to be met on sites being sold by the Council.

### **Parking**

Car parking is an essential element of present-day living. There are no positive policies presented in the Plan in relation to car parking, yet 1,000+ dwellings are to be built of which approximately 700 will not have dedicated parking space. As formerly stated, during the working week Loughton is saturated with parked cars. The loss of any parking spaces or the generation of need for more spaces, if not provided, will impinge further on the quality of life for residents.

### **Review Panel**

Setting up a Design Review Panel will be of great benefit in the consideration of large or contentious proposals in the district.

### **CONCLUSION**

The Plan is deeply flawed as it has introduced well-meaning policies for future housing developments which are not achievable with the scale of much of the development it is proposing. This particularly applies to the developments on the two Underground development sites, where the only reasonable way of providing the number of dwellings identified is by way of multi-storey blocks, when the character of the neighbouring area is set by 2-storey dwellings.

Jessel Green is a well-used and well-loved green 'lung' in the centre of a large housing estate. Objections arise concerning the proposal to colonise 50% of the Green for new housing, thereby increasing the nearby population whilst significantly reducing the amenity value of the Green. This would be in conflict with the proposed policies to increase and enhance green spaces. Again, a flaw in the Plan is exposed by this proposal.

The Plan seeks to justify the proposed 1,000+ new homes arising from "The aspiration for Loughton to be a major town" although there is no evidence of residents or the Town

Council having expressed that aspiration. Indeed, the Plan goes on to say that the evidence suggests that “Retaining a constant market share is a more realistic aim”. That is clearly an acceptance of the status quo which in itself demands little, if any, extra housing.

The proposals in the Plan for car parking are flawed. In city centres it may be reasonable to minimise private car parking where densities are extremely high, space is at a premium and a myriad of services are to hand. It is unrealistic for nearly 70% of new dwellings not to have dedicated parking facilities in a rural/sub-urban situation.

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