

Planning Policy  
Epping Forest District Council  
Civic Offices  
323 High Street  
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Essex  
CM16 4BZ

**By email**

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25 January 2018

Dear Sir / Madam

**EPPING FOREST DISTRICT PLAN SUBMISSION VERSION 2017  
CONSULTATION**

1. On behalf of our client, Sainsbury's Supermarkets Ltd (SSL), we submit representations in respect of the Epping Forest District Council's consultation on the submission version of the emerging Local Plan.
2. SSL currently operates the following stores within the District:
  - Loughton, Old Station Road, Loughton;
  - Chipping Ongar, Basons Lane, Ongar;
  - Loughton Church Hill Local, Church Hill, Loughton; and
  - Debden, 12 Torrington Drive, Loughton.
3. We previously made representations to the Draft Local Plan in December 2016 which can be summarised as follows:
  - We commented that the centre specific policies should properly designate existing retail uses within centres and be drafted in such a way to drive footfall to the centres;
  - We suggested that the Old Station Road, Debden and Chipping Ongar SSL stores should be included within the Primary Shopping Areas and Primary Frontages under policies P2 and P4; and
  - We supported the expansion of Chipping Ongar District Centre.
4. Set out below are Sainsbury's further comments in respect of Policies EC2, P2 and P4 of the Pre-Submission Local Plan and additional objections to Policies DM1 and DM13.

**Policy EC2 Centre Hierarchy/ Retail Policy**

5. Under this policy, applications for main town centre uses outside of the defined Town and Small District Centres will be required to undertake an impact assessment in accordance with national planning guidance i.e. when over a threshold of 2,500sqm.

6. The Town Centres review (2016) highlights in floorspace terms, Loughton High Road Town Centre is the largest centre within the District with only 37,890sqm of retail floorspace. 2,500sqm is 7% of the overall retail floorspace within Loughton High Road Town Centre, and therefore this figure would be significantly higher for the other centres within the district. This means that an out of centre retail unit of up to 2,500sqm could have a significant impact on the vitality and viability of existing centres across the district. As such, a threshold in line with national standards is not justified and should be lowered to protect existing Town and District Centres.
7. The original 2010 Town Centres Study was undertaken prior to the adoption of the NPPF and as such does not consider Impact Assessment Thresholds. The 2016 review also does not consider this NPPF requirement. As such, adopting a threshold of 2,500sqm has not been appropriately assessed and is not sound.

#### **Policy P2 Loughton**

8. Further to our previous representations on this policy, Maps 5.4 and 5.5 of Policy P2 show that the Sainsbury's stores at Old Station Road and Debden are within the respective boundaries of Loughton High Road Town Centre and Loughton Broadway District Centre. However, both stores are outside of the Primary Shopping Areas and Primary Frontages.
9. The Town Centres Review (2016) highlights that Loughton High Road Town Centre's non-Key Frontages have seen a larger decrease in the proportion of retail uses since 2009.
10. In order to prevent further loss of non-Key Frontage retail units, those units in close proximity to the Primary Shopping Area and which are providing significant A1 retail provision for the town centre, such as Sainsbury's, should be included within the Primary Shopping Area and Frontage. This will ensure that the long-term policy aspirations to promote growth in centres across the District in order to maintain their vitality and viability over the Plan period is achieved. This would also directly meet the vision for Loughton set out in the Local Plan:

*“The main centre of Loughton High Road will be strengthened and future development will support the Centre's continued role as a successful retail centre within the District.”*

11. Loughton Broadway reflects similar situation with a significant reduction in the number of retail units in both its Key Frontage and its non-Key Frontage. It is noted that part of this loss can be attributed to the expansion of Sainsbury's superstore on the edge of the Broadway which required the demolition of a number of former retail units. It is clear that Sainsbury's, in this location, is a significant A1 retailer for the District Centre and it would make sense for the expanded store to be included within the Primary Shopping Area to protect the significant increase in A1 floorspace within this area and extend the shopping frontage.

**Policy P4 Chipping Ongar District Centre**

12. Within Chipping Ongar, the Town Centres Review confirmed that the Key Frontages have experienced a similar decline to others within the district. A notable difference was the growth in retail units and reduction in non-retail units in the non-designated frontages within the District Centre. This clearly demonstrates the contribution non-designated frontages are making to Chipping Ongar District Centre. As such, there is clear justification for extending the Primary Shopping Area to protect the existing A1 units to maintain the vitality and viability of the centre and this should include the Sainsbury's store.

**Policy DM 1 Habitat Protection and Improving Biodiversity**

13. It is not justified or achievable to require all development to seek to deliver net biodiversity gains in addition to protecting existing habitat and species. Many types of development will not be able to achieve this, such as application for minor applications to existing buildings and other applications such as for advertisements. As such, the current wording of this policy is not justified and cannot be implemented in practice. The wording of this policy to be amended accordingly.

**Policy DM 13 Advertisements**

14. This policy sets out the approach to advertisements including that illuminated signs will not be permitted in residential areas. This policy is not justified or in accordance with national policy. Paragraph 67 of NPPF states that "advertisements should be subject to control only in the interests of amenity and public safety". The provision of illuminated signs within residential areas does not necessarily result in harm to amenity. This policy should be amended to say that illuminated signs will not be permitted in residential areas where they impact upon amenity.
15. We trust that these representations will be taken into consideration, however, please do not hesitate to contact me if you have any questions in relation to the above comments.

Yours faithfully



Kenya Hill

cc: Mr A Cundale, Sainsbury's Supermarkets Ltd.