

Epping Forest District Council Representations to the Draft Local Plan Consultation 2016 (Regulation 18)

Stakeholder ID	3849	Name	Marie-Claire Marsh	NLP on behalf of Higgins Homes Plc
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Method	Letter
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Date	12/12/2016
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Letter or Email Response:

Epping Forest District Draft Local Plan Representations on behalf of ...Redacted.... This letter has been prepared by ...Redacted.... on behalf of our client ...Redacted.... and comprises their formal representations to the Epping Forest District Draft Local Plan (2016-2033). ...Redacted.... is a leading housebuilder across London and the south-east and welcomes the opportunity to be involved in the District's emerging Local Plan. ...Redacted.... owns the former Royal Oak public house, at 148 Forest Road and 171 Smarts Lane, Loughton. The former public house ceased trading in 2014 as the use was no longer viable and there is no prospect of it re-opening. ...Redacted.... has sought to promote their landholding within the District and worked closely with the LPA's to demonstrate site deliverability. The former public house is allocated at Draft Policy P 2 'Loughton' of the Draft Local Plan as SR- 0527 (Royal Oak public house, Forest Road) for approximately 14 homes. The Site Allocation Higgins Homes fully supports the draft site allocation, which they confirm is deliverable, and considers that the number of residential dwellings allocated for the site by the Council is achievable and represents effective use of a brownfield site, whilst respecting the residential amenity and character of the area and the locally listed building. As the Council is aware, ...Redacted.... submitted a full planning application for the partial demolition and extension of the former Royal Oak public house, and change of use to private five flats, demolition of 171 Smarts Lane and redevelopment for nine flats with associated landscaping and parking. ...Redacted.... held a number of pre-application and planning application meetings with EFDC Planning Officers. Throughout these meetings, Planning Officers agreed that • The conversion of the building and its extension is welcome as an alternative to the loss of the locally listed building; • The design was considered acceptable; and • It is not considered that the proposal will be excessively overbearing, particularly as the central linking section is located well within the site. The planning application was accompanied by the required supporting technical reports, and this information demonstrated that there were no overriding constraints to delivery and that the application should be approved. There were no technical objections to the application, in terms of access, parking amenity and Planning Officers recommended the application be approved. The sub-committee resolved to refuse permission, but this will be appealed. This site is a brownfield, vacant site that provides the opportunity for redevelopment to provide required housing in a suitable and sustainable location. The site is available now and ...Redacted.... are in a position to implement a planning permission, and deliver the new homes, as soon as is practicable. Draft Policy H 1 Housing Mix and Accommodation Types Draft Policy H 1 states that development for market housing will be permitted where it includes a range of house types and sizes to meet local requirements and appropriate to size, location and characteristics of the site. This draft policy is pragmatic and flexible and is therefore welcomed by ...Redacted....

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Draft Policy H 2 Affordable Housing Draft Policy H 2 states that on development sites for 11 or more homes, the Council will seek a minimum of "40% of those homes for affordable housing". In accord with the NPPF, the policy should be worded to state that this is subject to financial viability, in order to ensure that developments with specific site constraints are able to come forward viably.Redacted.... agrees that the mix of units, in respect of affordable housing, should be determined on a site by site basis dependent on the overall needs for that area and the specific characteristics of the site.Redacted.... objects to the 40% affordable housing target on sites for 11 or more homes (lowered from 15 homes) as this is unlikely to be viable for all sites within this EFDC. It is noted that the EFDC Stage 1 Assessment of the Viability of Affordable Housing, CIL and Local Plan (June 2015), prepared by DSP states that a reduced affordable housing requirement, based on sliding scale principles, could be considered, recognising smaller scheme sensitivities.Redacted.... strongly suggests that this is considered by the Council to ensure that smaller sites continue to be viably developed. Draft Policy DM 10 Housing Design and Quality Draft Policy DM 10 states that ground floor family housing must provide access to a private garden/amenity space. The policy also requires family housing on upper floors to have access to a balcony, and/or terrace "subject to acceptable amenity, privacy and design considerations, or to shared communal amenity space and children's play space".Redacted.... consider that draft policy is flexible in respect of the upper floors, however the policy should be worded to make clear that amenity to family accommodation at both ground floor and upper floors is subject to privacy, design, site constraints and accessibility to shared communal or children's playspace. Concluding Remarks As set out above,Redacted.... owns the former Royal Oak public house and land at Smarts Lane, Loughton.Redacted.... fully supports the site's allocation within the emerging Draft Local Plan for residential development of approximately 14 homes which they confirm is deliverable. In respect of affordable housing policy, this should clearly reference that this is subject to a financial viability assessment.Redacted.... also consider that the Council should consider sliding scales for smaller sites under 15 homes, such as the former Royal Oak public house that would not be able to be viably developed if the Draft H 2 policy applied. In respect of Policy DM 10,Redacted.... would request that the policy wording was reconsidered so as to ensure the policy is clear and unambiguous. We trust that the above comments will be considered during the review of draft Local Plan and representations received. We would be happy to discuss this site with EFDC Officers.

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