

My two page Reg 19 Response 270118.pdf was a specific contribution comparing residents responses and the Local Plan Submission Allocation for Loughton - it will help the Inspector with those issues. 17 months later, I'd like the Inspector to be aware of a very controversial site at 13 to 15A Alderton Hill Loughton IG10 3JD (LOU.R14) which is shown in error in the DLP Submission document.

LOU.R14 is included in the Local Plan Submission but was absent from the Regulation 18 Public Consultation document in 2016. It only appeared in the Regulation 19 Consultation for Soundness on 5th December 2017 and is shown in error with 5 plots and a possible 33 dwellings. The owners of 17 and 19 Alderton Hill have not put their land forward for building so the Inspector is expected to seek correction of EFDC's Plan. Many residents hope the Inspector will remove LOU.R14 from the Plan. Planning Applications EPF/2499/17 and EPF/2115/18 have a huge number of households objecting to gross over-development of these three plots which has a substantial family house and large garden on each. The established character up all of Alderton Hill is large detached homes with good separation so this is the wrong place for 105 flats. EFDC has many specialist elderly schemes built or planned in better locations in other parts of the district and are currently ahead of other Councils for assisted living elderly flats.

EPF/2499/17 - 13 to 15A Alderton Hill, was refused on 18th April 2018 by 18 votes and 2 abstentions. It went to Appeal and a 4 day Public Inquiry Hearing was adjourned on 1st March 2019 - it's expected to resume in May. Plans for the six storey complex are: 105 flats, 186 bedrooms, restaurant, bar, salon/spa, gym, 18 staff, nurse on site 24/7 but only 51 valet parking spaces for residents. Alderton Hill is a District's premier residential road of 2 storey detached family houses.

The 'Assisted Living' concept is like living in a hotel but you own your flat. Planning App EPF/2499/17 registered 27th September 2017 is a gross over-development from a USA company. I've lived 5 houses from the site for 28 years and represent: **204** households who objected to EPF/2499/17, **139** households who e-mailed asking the appeal be dismissed, **319** households who objected to a substantially similar application EPF/2115/18 - registered on 15th August 2018 and is on-hold going to committee pending the Appeal decision. Impressively, **319 households** e-mailed objections to EPF/2115/18 and I stress these are households. The average number of adults per household in Alderton Hill is three so those 319 objections are the strong concern of about **975 residents** living in near roads - all characterised by single family homes with large gardens. Only seven people, I believe, support this second application which if granted, would set a disastrous precedent for Loughton and similar areas of Chigwell or Buckhurst Hill.

By 18th February 2019, EPF/2115/18 had **1801 pages** of application within 137 documents. The Applicant's quest for C2 Use Class has become clear - to avoid Government's rule for 40% of affordable homes. Viability reports state £44 million is the build cost but the applicant will be £9 million in debt after building so they can't provide 40% or afford any offsite payment. Officers must know how this loop hole is exploited but they were out paced by top planning agents who lead officers to C2 Use, early on, when EFDC charged, £80 an hour, for five Pre-Application meetings.

All EPF/2499/17 Flat Owners would pay: An upfront **Purchase Price** for their flat. A **Service Charge** - for running the building. An Event **Premium** - paid when the flat is sold to cover: replacement, wear & tear. The Basic Service Charge is: A minimum of 4 hours personal care a week, the provision of one daily meal and laundering of bedlinen & towels.

There is compelling logic for a C2/C3 split Use Class based on the percentage of floor area use and ownership: Residents purchase their flats - that's C3 Residential Use Class. They pay a Service Charge, delivered mostly in communal areas they don't own - that's C2 Use, like Care Homes. Event Premium is a charge to pay probably at a stressful time. Irrespective of Use Class, EFDC should insist on 40% affordable contribution from the Applicant for all C3 areas - this is what Government intends. Exact areas for EPF/2499/17 as submitted to the on-going Appeal are:

Storey	Misleading Plan Name	No of Flats	C2 Area m ²	C2 % of Floor	C3 Area Plan m ²	Total Area m ²	Terrace & Balconies+Juliet
Ground Floor	Lower Ground	3	1632	82.92	336	1968	0
First Floor	Ground Floor	24	186	7.84	2185	2371	22+2
Second Floor	First Floor	26	9	0.37	2426	2435	23+7
Third Floor	Second Floor	26	9	0.37	2426	2435	23+7
Fourth Floor	Third Floor	20	8	0.39	2044	2052	21+3
Fifth Floor	Fourth Floor	6	3	0.41	732	735	208 m ² +6+6
Total Six Floors		105	1847	15.39	10149	11996	208m²+102

EFDC Officer's Recommended Approval of EPF/2499/17 twice, in January and April 2018 but now EFDC is now better staffed, EFDC has changed its' position and robustly defended the Appeal. The Principle Planning Officer so noticeably in favour of EPF/2499/17 on the webcast April meeting has since taken a career change after 15 years with EFDC.

For all households who strongly objected, I ask the Inspector to please remove LOU.R14 from the plan because it would:

- o Anger 204 households who objected to an overbearing and garden grabbing over-development complex
- o Discredit the Local Plan if Five times the 20 dwellings allocated at 13 to 15A Alderton Hill are built
- o Be wrong if the site changed to only C2 Use - EFDC won't get 40% affordable homes as Government intends
- o Set a disastrous back land precedent for enormous flats in gardens in Loughton, Chigwell & Buckhurst Hill.