

This statement relates to Matter 5, Issue 1 - Site reference LOU R1 & LOU R2 (Settlement Loughton) and has been prepared by the Loughton Residents Association

We consider that this part of the Submission Version of the Local Plan is unsound because it fails to meet the tests of being

Positively Prepared

Effective

Justified

Consistent with national policy

We had asked to be invited to attend the hearing on Tuesday 19 March because of our local knowledge – however, as we have not been invited to attend, we have tried to provide expand our earlier comments to provide details which we hope the Inspector will find relevant when considering these sites.

The question asked is

6. Is it justified to allocate station car parks (**EPP.R3; LOU.R1, LOU.R2; BUCK.R2; THYB.R2**) and other car parks (**EPP.R6, EPP.R7**) for housing?

Can adequate parking for both commuters and residents be provided; and

how will short-term disruption to commuter parking during the construction phase be addressed?

Planning issues

1. LRA believes that densities of the level stated for sites LOU R1 and R2 cannot be achieved without significant breaches of a number of Plan policies.

2 The Plan envisages 165 dwellings on Loughton car-park (LOU R1) and 192 on Debden car-park (LOU R2), together with the same number of car-parking spaces as exist there at present.

Given the areas of the sites concerned and allowing for access and the vagaries of the shapes of the sites, this would imply at least 4 storeys of dwellings plus an underground car-park (plus some ground-floor parking as the limitations of walls and pillars would prevent the current number of parking spaces being provided underground). Whilst we are aware of the requirements of appendix 6 of the local plan, it is unclear whether or not they can be achieved, and how much masterplanning work has been done to see if the policy requirements are justified. It is therefore unclear whether or not this scale of development is deliverable

We do not consider that this is a justified approach in terms of the tests of soundness. Additionally, this could not fulfil the requirements of

Policy DM9A for developments to

- (i) relate positively to their context;
- (ii) make a positive contribution to a place;

Policy DM9D, which states

D. Development proposals must relate positively to their locality, having regard to:

- (i) building heights;
- (ii) the form, scale and massing prevailing around the site;
- (iii) the framework

Policy DM9F which states

F. Where appropriate development proposals must contribute positively to the public realm and to public spaces to which it is physically or functionally connected.

Policy DM9H

H. Development proposals must take account of the privacy and amenity of the development's users and neighbours. The Council will expect proposals to:

- (i) provide adequate sunlight, daylight and open aspects to all parts of the development and adjacent buildings and land (including any private amenity) space;
- (ii) avoid overlooking and loss of privacy detrimental to the living conditions of neighbouring residents and the residents of the proposed development;
- (iii) not result in an over-bearing or overly enclosed form of development which materially impacts on either the outlook of occupiers of neighbouring properties or the residents of the proposed development; and
- (iv) address issues of vibration, noise, fumes, odour, light pollution, air quality and microclimatic conditions likely to arise from any use or activities as a result of the development or from neighbouring uses or activities.

3. We also note that underground parking is seen as inappropriate for designing out crime, and this would be particularly the case next to an Underground station. See Policy DM 9A, which states that the Council will require all development proposals to (v) incorporate design measures to reduce social exclusion, the risk of crime, and the fear of crime.

4 There are similar implications on these issues if parking and dwellings are provided in separate blocks (and this would inevitably be a less efficient use of space).

Additionally, there are inconsistencies with national policy set out in the National Planning Policy Framework 2012 (NPPF). The NPPF is clear (para 556) that good design is "...a key aspect of sustainable development.....and should contribute positively to making places better for people".

5. Background information on the two sites

Note: we confine comments to the two Loughton sites but *mutatis mutandis* they apply to Epping and Theydon Bois also)

5.1 LOU R1 is next to housing of one or two storeys in Lancaster Drive (to the south and across the railway) and Meadow and Lower Park Roads (to the west); and LOU R2 is next to housing of two storeys in Torrington Drive.

In order for any developments on the car-parks to be in keeping with their surroundings (Policy DM9D), the developments should therefore be at the most 2 or 3 storeys along the shared boundaries, rising to say no more than 4 storeys alongside the railway lines.

5.2 For LOU R1, the positioning of the (listed) Loughton station building would mean that one or at the most two storeys would be the most which could be placed adjacent to Station Approach.

5.3 In the case of Debden Station, the original station house of 1856 is extant, and the Station itself contains undesignated heritage assets, which any development must seek to retain and enhance.

5.4 We therefore believe that the Council's stated housing targets are unachievable if it also requires to meet its objective of replacing the existing level of parking on each site.

5.6 Both car-parks are heavily-used at present by local residents (and, we believe, commuters from outside the town). Both are situated off busy main roads.

5.7 Loughton Station car-park

The entrance and exit to the Station car-park is on Station Approach, which is also the town's bus terminal (see map below); all the bus routes passing through the town pass along Station Approach.

The Station car-park shares its entrance/exit with the large car-park to its north which serves the Sainsbury's store. Under the agreements made when the store gained planning approval, the

“Sainsbury’s” car-park operates as a public car-park and is therefore used by others as well as Sainsbury’s customers.

On normal weekdays the Station car-park is full by 9am. Indeed, a number of commuters use the Sainsbury’s car-park, despite the daily charge being almost double (£10) that of the Station car-park (£5.20).

If the site were to be developed, there would therefore be a considerable detriment to residents (and other commuters) while this was being carried out, as there is no available unused parking within easy reach of the station. Indeed, the current level of nuisance to residents from commuter parking is such that a number of residents’ parking schemes have been introduced, and others are in the pipeline. We cannot see how the construction phase could be managed so as to continue the bus/rail or car/rail interface to be maintained.

5.8 Debden Station car-park

The entrance and exit to the car-park is along Station Approach onto the A1168 Chigwell Lane (the continuation of Rectory Lane).

We have made the point elsewhere that, because of the start of trading at nearby the Langston Road retail park, Chigwell Lane is already carrying significantly more traffic than allowed for in the Highways projections. We also note that the projections do not allow for Highways plans to restrict the outer westbound lane of Chigwell Lane to traffic turning right into Station Approach (largely as the result of a 2018 KSI accident at this point) –this will further restrict the flow of westbound traffic.

On normal weekdays the Station car-park is full by 9am.

If the site were to be developed, there would therefore be a considerable detriment to residents (and other commuters) while this was being carried out, as there is no available unused parking within easy reach of the station. Indeed, the current level of nuisance to residents from commuter parking is such that a number of residents’ parking schemes have been introduced, and others are in the pipeline.

5.9 At a previous stage, we put in a separate submission about the potential employment effects of developing Loughton site LOU R2, which will be dealt with in another hearing session

5.10 At site LOU R2, the 1865 station house, though altered, is a non-designated heritage asset under paragraph 135 of NPPF, meaning that the effect of any development on the non-designated heritage asset has to be taken into account in decision-making.

5.11 The formation of the railway at this point is wide so as to accommodate one, previously two, turn-back sidings. The maintenance of this facility is of the utmost importance if there is to be any extra housing near Epping or north thereof, as turning trains at Debden will be vital to allow passengers to board south of that point; such are the capacity issues.

6. Changes needed

The Plan can be made sound in this respect

- by omitting these sites, or
- by significantly reducing the number of dwellings allocated to them.

7. Wider issues

These points will be discussed at other sessions during the hearing.

However, we raise them now to show the context in which the Council chose to allocate housing to these sites. We submit that in terms of the Council’s site allocation criteria, the scores for these sites would fall

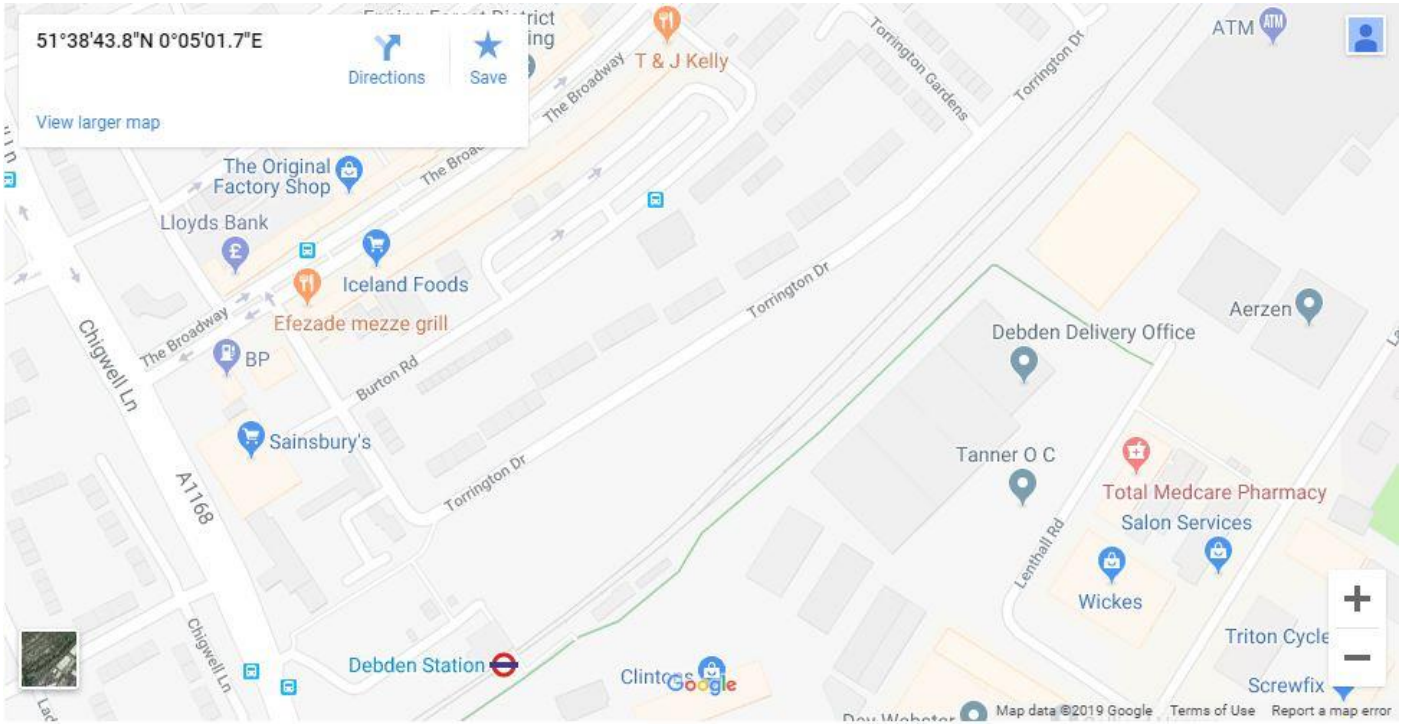
well below the scores for many of the sites elsewhere in the District which the Council rejected (but we cannot verify this because the Council has failed to make its scores available in a transparent manner).

1. Objections to these proposals were raised by Cllrs, residents, Loughton Town Council and LRA during the consultation stages of the Plan. We feel that the Council has failed to take proper action in respect of these views. They have also failed to explain in anything other than the vaguest terms how they dealt with the responses to the public consultations.
2. We see the inclusion of these unsuitable sites as exemplifying our contention that the Council decided to require an unreasonable amount of housing in Loughton, despite the lack of suitable opportunities. The Council itself states that Loughton is constrained by its surroundings *6 Growth of Loughton/Debden is wholly restricted by (i) Epping Forest along the northwestern edge; (ii) the River Roding floodplain on the south-eastern boundary, the latter also containing the Roding Valley Meadows Local Nature Reserve (LNR), part of which is a Site of Special Scientific Interest (SSSI); and (iii) the narrow but important Green Belt gaps between (a) north-east Debden and Theydon Bois, and (b) south-west Loughton and north-east Buckhurst Hill. P 226 EB131*
Indeed, the assertion at LPSV p 121 that the Council arrived at Loughton's housing allocation so that *it would remain a major town* is mere flummery - even if *no* new housing is allocated to Loughton, it would remain a major town in the District throughout the Plan period. It does not require the allocation of unsuitable sites to make it a major town.
3. All this of course also fails to take account of Loughton's proximity to Epping Forest itself. We note that at LPSV P1H p 117 the Council stated in relation to housing in Epping that *account had been taken of its proximity to Epping Forest re recreational pressure on the SAC* – the Council appears to have completely failed to take similar action in respect of Loughton.

About Loughton Residents Association

Loughton Residents Association is a very active group of local residents who care for Loughton and its environment. Our membership is around 1,000 households, and we have been in existence for over 35 years. We are independent of any political party. We seek, and listen to, the views and concerns of Loughton residents and take action in support. We have a majority of the councillors on the Loughton Town Council, are the second largest group on Epping Forest District Council & are represented on Essex County Council. We provide our own regular printed and email newsletters to residents and our own website, www.loughtonresidents.org.uk

Debden Station



Loughton Station

