
EPPING FOREST LOCAL PLAN EXAMINATION

Matter 15: Places - Policy P2: Loughton

Hearing Statement on behalf of Bullwood Ltd (Ref 19LAD0068)

1. POLICY P2: LOUGHTON

Issue 1: Can Junction 5 of the M11 accommodate the proposed level of development? Can any necessary mitigation be achieved?

- 1.1 Highways England's representation states that development in Loughton is likely to have an impact upon this junction and that this will need to be assessed and mitigated. The junction is sensitive to traffic build-up along the A1168, which is currently a major problem during peak hours – particularly northbound congestion arising as result of the Chigwell Lane / Oakwood Hill junction constraints.
- 1.2 Although the Transport Assessment Report (EB503) generally concludes that there are no insurmountable constraints to growth at Loughton, there is no overarching strategy to plan for and fund substantive highways and safety improvements at Junction 5 and along the A1168. In contrast to current draft allocated sites in Loughton – particularly LOU.R2, LOU.R4, LOU.R5 – our client's site is uniquely-placed to facilitate comprehensive upgrades to this part of the road network through a combination of land dedication to support road widening, and a combination of significant funding and / or s278 works associated with its Roding Garden Village redevelopment proposals.

Issue 3: LOU.R1 and R2 (Underground Car Park Sites): Can the quantity of development proposed be achieved without excessively high-rise development? Could high rise development be accommodated here if necessary in compliance with Policy DM9?

- 1.3 The dwelling capacity of these two sites was derived in the Site Selection Report Appendix B1.6.4 (Document EB805N). It is based on the high-level assumptions below:

	LOU.R1 (Loughton Stn)	LOU.R2 (Debden Stn)
Gross site area (ha)	1.62	1.66
Net-gross ratio	0.9	0.9
Net site area (ha)	1.46	1.49
Assumed density (dph)	113.9	116.2
Dwelling capacity	165	192

- 1.4 Firstly, we consider that the developable area of these sites has been over-estimated. The Loughton Station site includes a thin strip of land sandwiched between existing residential properties and the rail line, to the south of Algiers Road. The Debden Station site includes areas of trees which screen properties in adjacent residential areas from the station car park and rail line. These should be excluded from the developable area. Provision for access to the retained car parking will also be

needed and will further reduce the developable area. We consider that the net-gross ratio is therefore over-stated and is more likely to be nearer 0.7.

- 1.5 Secondly the high-level approach to densities which has been used, which principally reflects the sites' accessibility, has essentially had little regard to the site's context and surroundings and character of the local area. This is inconsistent with other emerging policies in the Plan and prevailing design and townscape advice. Draft Policy DM9 requires development proposals to relate positively to their locality, having regard to building heights; the form, scale and massing prevailing around the site (which in both cases is two story residential) and the rhythm of the neighbourhood. The application of this policy, and general amenity considerations, would inevitably lead to a lower density and development yield.
- 1.6 We further consider that it is not realistic for parking for the Underground stations to all be located below the residential development. The evidence base has not demonstrated that this is viable; and it would be impractical. We consider that standalone multi-storey car parking on site is more realistic, as was envisaged in the Settlement Capacity Study (EB803 Appendix H).
- 1.7 It follows from the above that the capacity of these sites has been significantly over-stated. The policy should be amended to show lower development quantum for both sites.

Issues 4: LOU.R5 (Jessel Green Masterplan Area): Is this allocation justified with particular reference to the value of the site as open space to the local community?

- 1.8 This site is well used for informal leisure activities and a range of community events. Loughton Town Council's representations clearly evidence that it is valued greatly by the local community. We consider its proposed redevelopment to be inappropriate when there is suitable alternative land adjacent to the settlement that can accommodate Loughton's growth requirements.
- 1.9 A review of historical maps indicates that the Green was set out when the surrounding Debden Estate was constructed in the immediate post-war period (1950s). It is clearly integral to the design and layout of the original estate, the Green forming the central heart of the Estate with residential development wrapping around it. Its redevelopment would plainly be harmful to the character of the area.
- 1.10 The Council's evidence base (EB703) indicates that whilst quantitatively there is adequate supply of amenity green space provision in Loughton, there are particular issues of accessibility to a range of sites. As EB703 Para 7.4 stated: "*a key issue at many of the sites was poor access, which was particularly difficult for the disabled or less able-bodied.*" Jessel Green is one of the only easily accessible green spaces in the Town. This supports its retention.

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- 1.11 Furthermore the proposals for the site conflict with the policies on green infrastructure within the Plan (DM5 and SP7) reducing the green space available to residents. The site is clearly an important green infrastructure resource which serves the Debden Estate area.
- 1.12 Its development would displace recreational pressure onto Epping Forest, where the strategy should be one of seeking first-of-all to avoid impacts of recreational pressures on the SAC.
- 1.13 We consider that the best alternative strategy – and one which would secure the wider support of local residents – would be to protect valuable existing green space within the urban area, such as Jessel Green, and instead to identify alternative allocations at Loughton, like the Land at Woolston Manor Golf Club, which can accommodate development at a scale that can deliver new social and community infrastructure, and secure new recreational open space.

APPENDIX 1 – WOOLSTON MANOR GOLF CLUB SITE LOCATION PLAN

The map displays the Loughborough area, featuring the M11 motorway running diagonally from the bottom left towards the top right. A red outline highlights a specific area of interest, which includes a large green field and a residential area. The map also shows various roads, including the A1021 and A1022, and several landmarks such as the Loughborough University and the Loughborough Sports Centre. A scale bar at the bottom indicates distances from 0 to 1000 meters, and a north arrow is located in the top left corner.

Scale: 1:20,000 @A4