

#### **4. This representation relates to**

Paragraph

Policy

#### **Site reference LOU R1 & LOU R2**

Settlement Loughton

#### **5. We consider that this part of the Submission Version of the Local Plan is**

##### **b) Sound: No**

because it fails the following aspects

**Positively Prepared**

**Effective**

**Justified**

#### **6. Details of why we consider the Plan to be unsound**

##### *6.1 Policies relating to station car parks*

LRA believes that achieving densities of the level stated for sites LOU R1 and R2 cannot be achieved against the parameters set out in policy DM9 A, D, F, G & H<sup>i</sup>

6.2 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).

6.3 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(v) - end-note i).

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

6.5 LOU R1 is next to housing of one or two storeys in Lancaster Drive and Lower Park Road, 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 (see the extracts from Policy DM9 in end-note i), 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. 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. 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 should seek to retain and enhance.

6.5 We have put in a separate submission about the potential employment effects of developing Loughton site LOU R2.

6.6 At site LOU R2, the 1865 station house, though altered, is most likely an undesignated heritage asset under para 135 NPPF

### **7. 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.

### **8. Participation in the oral part of the examination**

Yes, we wish to participate in the hearings.

### **9. We consider this to be necessary because**

We think that it is necessary for us to participate at the hearings

- Because of our local knowledge (see description of Loughton Residents Association below)
- Because of the Council's failure to take proper action in respect of the views expressed in public consultations or in feedback from local Cllrs (see for example our representation on Site LOU R5 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](http://www.loughtonresidents.org.uk)

### **10. We wish to be notified when the Plan is submitted for independent examination**

Yes ✓

### **11. Have you attached any documents to this application? No**



Signature:

28/01/18

---

specification of design and contribute to the distinctive character and amenity of the local area. The Council will require all development proposals to be design-led and:

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

.....  
(v) incorporate design measures to reduce social exclusion, the risk of crime, and the fear of crime.  
.....

#### Design Standards

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 of routes and spaces connecting locally and more widely;
- (iv) the rhythm of any neighbouring or local regular plot and building widths and, where appropriate, following existing building lines;
- (v) the need to provide active frontages to the public realm; and

.....  

#### Public Realm

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

#### Connectivity and Permeability

G. Where appropriate, development proposals must maximise connectivity within, and through, the development and to the surrounding areas including the provision of high quality and safe pedestrian and cycle routes.

#### Privacy and Amenity

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.