

Loughton Residents Association Plans Group



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The Head of Planning & Economic Development
EFDC
Civic Offices
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Dear Sir

EPF 2163 13 Sir Winston Churchill and adjoining land, The Broadway,

Demolition of Public House and garages and replacement with construction of a mixed use development, comprising retail and food and drink units (within classes A1, A3 and A4) at ground floor level and 64 residential units at upper floor levels (first to sixth floors), together with 64 car parking spaces, service yard, access and car parking.

We object strongly to this application, because of

- its excessive scale,
- its out-of-keeping design,
- the unsuitable proposed road layout,
- the lack of a suitable amount of parking provision,
- the inclusion of retail premises
- the lack of any commitment to provide similar licensed premises to those now on the site.

Scale

Even if this development is to be viewed as a “gateway” feature (which we dispute – see below), this 7-storey proposal is grossly out of scale with anything else in the town, and could set a very unfortunate precedent!

The proposed building comes right to the edge of the footpath, and will be very much higher than the housing to the two-storey housing to the north-west, and the three-storey shops & flats in The Broadway to the north-east.

We also note that it will be significantly higher than Epping Forest College (which in any case is set well back from Borders Lane, on an isolated site) and will be significantly higher than the car showrooms further down Chigwell Lane (which in any event appear less bulky because they are lower down the hill).

Its position on the uphill side of the entrance to The Broadway will accentuate the unsuitable height and bulk of the proposed building, particularly for those approaching along Chigwell Lane from the south-east.

In summary, "...the elements of the design have to be justified in terms of human scale" (*Design & Access Statement*, page 8) – the design completely fails this test.

"Gateway"?

'The site forms one side of the entrance to The Broadway and any development should complement that on the opposite site'. (*Design & Access Statement*, page 12).

We understand that the lease for the garage on the other side of The Broadway has been renewed, and that there is therefore no likelihood of there being a "balancing" development on the downhill side of The Broadway for many years to come. This application does not therefore constitute part of a "gateway" but is a one-off case.

Indeed, one can argue that in the circumstances a single-storey or two-storey development would be the only solution which complies with the requirement to complement the set-back low-level buildings on the other side.

Design

The applicants themselves admit in their proposals that the design is out-of-keeping with The Broadway ("the design of the proposal reflects the desire to create a contemporary building and move away from the dated traditional style and materials used in the proximity" (*Design & Access Statement*, page 9)). We note that many local residents feel the same way.

The Broadway is a rare example of a 1950s "Festival of Britain" style pair of parades which, because of its ownership by EFDC, has retained much of its original design, and so any buildings at the end of The Broadway should be in keeping with the existing buildings.

We note that Loughton Town Council has suggested The Broadway be made a conservation area because of its unchanged ambience.

Roads & traffic.

The site is positioned at an extremely busy corner, where there are already long traffic tail-backs during the rush-hour periods.

The Transport Statement appears to have written without any knowledge of the local area!
"3.3 The Broadway provides access to an extensive array of retail and commercial facilities, on-street parking Further east The Broadway leads to residential dwellings and therefore does not form a major route for traffic."

This can only be characterised as nonsense - there are 5 schools in the residential area and these generate considerable volumes of traffic along The Broadway, alongside that created by local commuters and shoppers.

Sainsbury's have a planning application with the District Council for their Torrington Drive store (opposite this development site) which involves increasing the store's off-road parking and various improvements to the store, which will lead to further traffic increases at the junction of The Broadway and Chigwell Lane/Rectory Lane.

Epping Forest College also gives rise to traffic movements along The Broadway and Rectory Lane/Chigwell Lane.

The proposed layout on Rectory Lane is wholly unacceptable – an exit is provided from Barrington Green into Rectory Lane, just to the west of the turning into The Broadway. Traffic trying to enter here, particularly at busy periods, would disrupt the flow of Rectory Lane traffic.

Instead, just to the east of 34 Rectory Lane (the end house), Rectory Lane could be widened to form a left-turn lane into The Broadway, thus greatly improving traffic flow at busy periods. (Traffic from Barrington Green could then join this new lane).

However, whatever is proposed should include a proper analysis of the potential effect of any layout changes on the residents living in Doubleday Road, Barrington Road and Ibbetson Path, given the proximity of a local primary school, Thomas Willingale (the main entrance for pupils is at the top of Willingale Road and increasing more vehicles along this already very busy section of road could cause serious accident risks to vulnerable road users.

The Traffic Statement has no data relating to the actual area – instead it attempts to use data from elsewhere which appears to be irrelevant or at the very least inadequate.

Parking & Transport

The Parking assessment (5.2 – 5.8) in the Transport Statement is wrong, as it is based on the assumption of 64 *one-bedroom* flats – we have confirmed this with the author of the Statement.

The ECC requirement for 3 one-bedroom flats and 61 two-bedroom flats is actually 125 car spaces for residents and 16 for visitors, totalling 141. The proposal to provide 64 spaces therefore constitutes under half the ECC requirement (45%) and is inadequate even allowing for local public transport facilities.

The ECC requirement based on the commercial space to be provided would be 66 spaces – but none are provided in these proposals! The Statement suggests that existing parking can be used, but its author has confirmed to us that they were not asked to ascertain whether there were spaces available in such parking areas.

No mention is made of the current usage of the garages which will be demolished, and where any current users will find some-where to park.

The whole area is subject to heavy commuter parking, which the District Council must be aware of, as it has for some years been involved in a Parking Review of the area – and which it has been scandalously slow to implement.

The Central Line is already operating at or above capacity, and so does not provide a suitable public transport alternative

Traffic Statement

In view of our comments above on roads and parking, we consider that the traffic material provided with the application falls so short of a satisfactory analysis of the actual traffic position as to be wholly unsuitable for its purpose. (We cannot of course identify whether or not this results from an inadequate specification of the consultant's role).

Shops flats etc. A mix of retail and restaurants/bar is proposed for the ground floor.

Whatever was contained in the original design brief for The Broadway area, which was drawn up in 2008 before the economic crisis, we see no need for extra retail space here now – the effect is likely to be to reduce, rather than enhance, the commercial viability of The Broadway shopping area.

We are also concerned that there is no requirement that there be a replacement pub in the complex (the A3/A4 space could be used for a restaurant or night-club instead). There is strong local feeling against the loss of the Sir Winston Churchill. In last ten years Loughton High Road has seen the conversion of pubs to what are essentially night-clubs in a residential area, and we wish to avoid a similar change in The Broadway area, which is also heavily residential.

If nevertheless the application is to be approved

If nevertheless the District Council is minded to approve the application, we are asking for

- the usual condition limiting working hours during any demolition and building work
- a suitable s106 payment from the developers to complete a thorough parking review and RPZ in the surrounding area
- a firm condition requiring the provision of suitable replacement licensed premises (but NOT a night-club)
- as the site is situated on a very busy road corner, and surrounded by residential roads where there is already serious parking congestion, a condition requiring well-thought-out arrangements for storage of materials and parking of vehicles during construction work so as to avoid disruption for local residents and traders.

Yours faithfully

David Linnell
for Loughton Residents Association Plans Group