FIRSTPLAN











Rear of 165 High Road, Loughton, IG10 4LF

Planning, Design and Access Statement

PP Ref: PP-07423730

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Section 1 Introduction

1.1 This Planning Statement has been prepared on behalf of our Client, SAFL Property Ltd., in respect of the rear of 165 High Road, Loughton.

1.2 The application seeks planning permission for:

> ***"Erection of a one storey roof extension to provide an additional 2 no. flats (2 x 1-bedroom penthouse flats)".***

1.3 This application follows on from a planning consent (appeal ref: **APP/J1535/W/15/3065764**, herein referred to as the 'appeal scheme') at 165 High Road, which allowed for the demolition of an existing outbuilding on the site and erection of a 5-storey building. This application also granted permission for the refurbishment of an existing building to the front of the site (which does not form part of the red line area of this current application). This appeal scheme has been implemented and is being built out.

1.4 This application has been prepared with the objective of optimising the development potential of the site by providing additional residential floorspace, which will contribute to the vibrancy and diversity of the area, and will work towards the Council's housing targets.

1.5 The proposed fifth floor extension has been designed to an extremely high standard to ensure that it complements the approved building and will make a positive contribution to the character and appearance of the wider area.

1.6 Background information on the proposal, including a description of the site and relevant planning history is outlined in Section 2. Section 3 provides a description of the application proposals. Section 4 details the relevant policies to the scheme, with Section 5 providing an analysis of the planning considerations. Section 6 sets out the Design and Access Statement and our conclusions are drawn in Section 7.

Section 2 Relevant Background Information

a) Site and Surrounding Area

2.1 The appeal scheme related to 165 High Road, which included works to the western part of the site, which fronts onto the High Road, and works to eastern portion of the site, at the rear of the High Road. The application proposals relate solely to the rear part of the site, as indicated on the proposed drawings and within Image 1, below.

2.2 The rear of 165 High Road, which forms the application site consists of a series of disused storage areas and a small car park used by the ground floor offices. The front part of 165 High Road, which does not form part of the application site, is a three storey, flat roofed rectangular structure, dating from the 1960's built predominantly of red brick. The appeal scheme has been implemented, and is being built out, as discussed further, below.

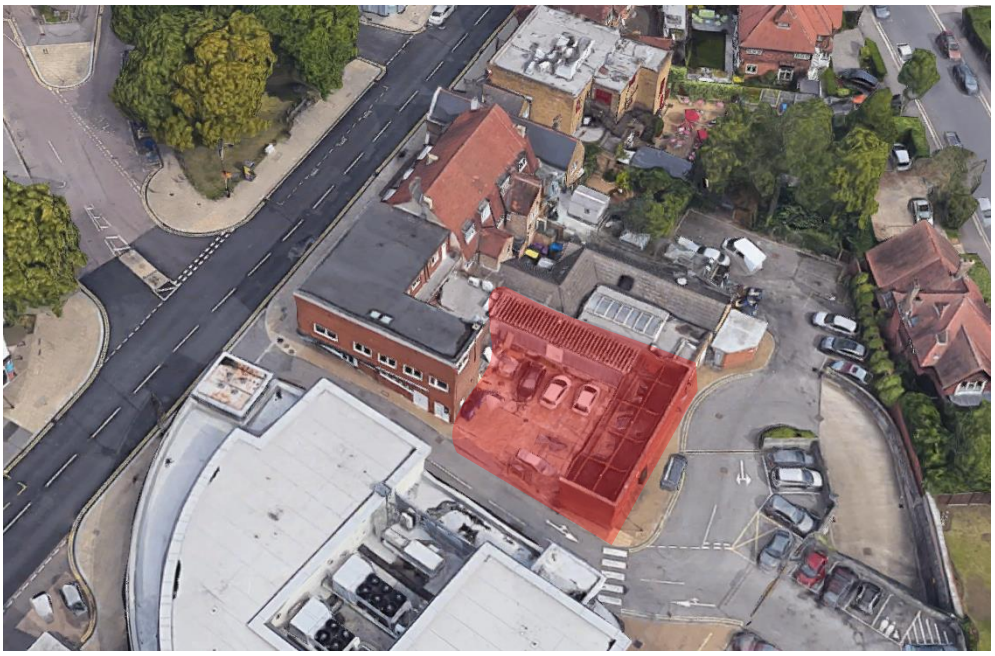


Image 1. Aerial View of the rear of 165 High Road

2.3 Loughton has grown over the last 50 years and has become one of the most urban and busy of the town centres within the Epping Forest District.

2.4 This growth has seen the construction of a mixture of architectural styles within the town. As such the surrounding area includes a wide range of building styles, sizes, materials and heights. Adjacent to the site, a contemporary new development has been built containing a large Marks & Spencer's store with car parking at the rear. Reflecting the site's central location, there is easy access to transport and surrounding services and facilities in Loughton.

2.5 The pattern of uses found on Loughton High Road are predominantly shops, offices and restaurants. There are also many examples of residential use in upper floors (such as the application site).

2.6 There are no nearby Listed Buildings and the application site does not fall within a Conservation Area.

b) Planning History

i) Application Site

2.7 Appeal Ref: **APP/J1535/W/15/3065764** (planning ref. EPF/2600/14) was granted permission on 15 October 2015 following a decision to refuse by Epping Forest District Council for: 'The demolition of an existing outbuilding and a small section of stairwell to the rear. The erection of a 5-storey building to the rear of the site to provide one commercial unit (Use Class A2) at ground floor and 12 flats (8 x 1 bedroom and 4 x 2-bedroom flats) on upper floors. The refurbishment and revitalisation of the existing building to the front of the property including the erection of an additional floor to provide 2 x 1-bedroom flats'. It is noteworthy that the application was recommended for approval by the Council prior to being put forward to planning committee.

2.8 One reason for refusal was cited by Epping Forest District Council in their decision notice. This related to the effect of the proposed development on the character and appearance of the locality. Subsequently, an appeal was made to the Planning Inspectorate and the Inspector found;

> **"Given the relative positions of the proposed development and existing developments nearby and the design of the rear building including positioning of windows and balconies the proposal would not result in a loss of privacy, light or view that would make the proposal unacceptable. The development would result in the efficient use of a previously developed site which would contribute towards the vitality and viability of the town centre".**

2.9 Previous applications on the side include the following:

- Application **EPF/0221/11** was refused for: 'Refurbishment and enlargement of existing building by way of a basement storage area, construction of one additional storey and erection of a four-storey rear extension incorporating 5 parking spaces, extension to ground floor commercial units (12 additional flats) comprising 6 studio flats, 8 one-bedroom flats and 2 three-bedroom flats'. A subsequent appeal was dismissed, solely on the basis that no contribution for education provision was offered.

- Application **EPF/0708/12** was granted permission for: 'Refurbishment and enlargement of existing building by way of basement storage area, construction of additional storey, and erection of a four-storey rear extension incorporating 5 parking spaces, extension to ground floor commercial units (12 additional flats) comprising 6 studio flats, 8 one-bedroom flats and 2 three-bedroom flats'.

- Application **EPF/2081/12** was granted permission for: 'Minor material amendment to planning permission EPF/0708/12 comprising the removal of the rear parking spaces and replacing them with office space. In addition, bin store access moved to rear façade'.

ii) <u>Surrounding Area</u>

2.10 A review of the planning history for the High Road shows that there has been little development in recent years. Of relevance to this application are the following;

- Application **EPF/1750/03** was granted permission for: 'Redevelopment of site to provide retail food store with associated car parking and alterations to the existing access', at the former Lambs Garage site which Marks and Spencer's now occupy, which lies adjacent to the application site.

- Application **EPF/0866/03** was granted permission for: 'Demolition of existing buildings and redevelopment to provide 14 no. two bedroom apartments, together with parking/garaging facilities and ancillary amenity space and landscaping', at 105-107 High Road.

2.11 A search for recent applications for additional storeys within Loughton include:

- Application **EPF/2737/16** was granted permission for: 'Roof extension to provide two additional apartments' at 184-186 High Road, Loughton. Previously, under application EPF/1268/06, permission had been granted for an additional floor to the building.

- Application **EPF/0970/16** was granted permission for: 'Rear, side and roof extensions and alterations including new dormer windows, and conversion of existing property of two residencies into three flats' at 20 Albion Hill, Loughton.

2.12 The above applications demonstrate that the Council will favour an extension in principle whereby the design is considered appropriate and there is not a detrimental impact on the amenity of surrounding occupiers.

Section 3 Application Proposals

3.1 The proposals relate to the provision of two additional penthouse flats to be provided within an additional storey at the fifth-floor level, following the granting of the appeal scheme. These units will comprise 2 x 1-bedroom flats. The lower floors will remain as per the approved appeal scheme, which has already been implemented.

3.2 Externally, the proposed additional floor is recessed from the edges of the permitted building in order to remain subordinate to the remainder of the building. The external walls will predominantly comprise grey metal panelling. The proposed doors leading out onto the balconies will be similar in appearance to those at the lower levels, as per the approved appeal scheme. The lower part of the balconies will be obscured by the parapet and a bronze balustrade will be placed over the parapet wall for security. A green roof will be provided at fifth floor level, to match the previously approved green roofing on the building.

3.3 Internally, the two proposed flats at fifth floor level will be accessed via a separate short flight of stairs which lead from the fourth floor up to a landing at fifth floor level. Further details of each of the two new flats is set out within Table 1, below.

Flat Reference:	GIA (sqm):	External Amenity Area (sqm)	Cupboard space (sqm)	Accordance with Technical Housing Standards
Flat 'F13' (1b,2p)	55.3 sqm	12.7 sqm	1.5 sqm	Yes
Flat 'F14' (1b,2p)	50.7 sqm	10 sqm	2 sqm	Yes

Table 1: Details of proposed flats

3.4 In terms of refuse and recycling, it is proposed that additional bins will be provided within the already approved bin store at ground floor level, as per the appeal scheme. This will be in line with the Epping Forest Waste Management Requirements.

3.5 Similarly, space for an additional 6-8 bikes will be provided within the already approved cycle store at ground floor level to allow for 18 – 20 bikes in total.

Section 4 Relevant Planning Policies

4.1 The statutory policy framework relevant to the site comprises the Epping Forest District Local Plan (with combined policies 1998 and alterations 2006). A new Local Plan has been prepared for Epping Forest District Council and was submitted for Examination in Public in September 2018. The currently proposed adoption date in unknown.

4.2 In addition to this, the National Planning Policy Framework (2018) and associated National Planning Practice Guidance, are material considerations.

4.3 As identified by the Council's Policies Map and related policy documents, the site is subject to a Town Centre designation.

4.4 In the context of the aforementioned designation, and the application proposals, the relevant planning policies are summarised below:

a) National Planning Policy Framework (NPPF) (2018)

4.5 The revised National Planning Policy Framework was published on 24 July 2018 and replaces the previous NPPF, published in March 2012. The NPPF provides overarching planning policy guidance for development across England.

4.6 Paragraph 7 of the NPPF states that:

> **"The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs".**

4.7 Paragraph 10 sets out that at the heart of the framework is a "presumption in favour of sustainable development". Paragraph 11 of the NPPF notes that for decision-taking, sustainable development means approving development proposals that accord with an up-to-date development plan without delay.

4.8 In terms of decision taking, Paragraph 38 sets out that Local Planning Authorities should approach decisions on proposed development in a positive and creative way. It states that decision-makers at every level should seek to approve applications for sustainable development where possible. Paragraph 47 requires that applications are determined in accordance with the development plan, unless material considerations indicate otherwise.

4.9 Paragraph 59 seeks to support the Government's objective of significantly boosting the supply of homes. It states that it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.

4.10 Paragraph 68 states that:

> **"Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly."**

4.11 Paragraph 117 sets out that planning decisions should promote an effective use of land in meeting the need for homes and other uses.

4.12 Paragraph 118 seeks to ensure that planning policies and decisions:

> **"…d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure); and**
>
> **e) support opportunities to use the airspace above existing residential and commercial premises for new homes. In particular, they should allow upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, is well-designed (including complying with any local design policies and standards), and can maintain safe access and egress for occupiers".**

4.13 Paragraph 127 sets out that decisions should ensure that developments:

"a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;

e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and

f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience."

b) Local Policy

i) Epping Forest Local Plan (2008)

4.14 **Policy CP2** 'Protecting the quality of the rural and built environment' states that the urban environment can be maintained, conserved and improved by the safeguarding and enhancing the setting, character and townscape of the urban environment.

4.15 **Policy CP3** 'New Development' states that the scale and nature of new development must respect the character and environment of the locality.

4.16 **Policy CP7** 'Urban Form and Quality' notes existing built-up areas will be used in the most efficient way to accommodate new development by:

(i) recycling of vacant, derelict, degraded and under-used land to accommodate new development;

(ii) re-use of existing buildings by refurbishment, conversions, changes of use and extensions;

(iii) re-use of urban sites, which are no longer appropriate to their existing or proposed use in the foreseeable future, for alternative land uses; and

(iv) use of higher densities where compatible with the character of the area concerned and urban design controls.

4.17 There are several policies relating to housing which has significance to the proposal. Within **Policy H3A** 'Housing Density', the Council states that new housing development should achieve a net site density of at least 30 - 50 dwellings per hectare.

4.18 **Policy H4A** 'Dwelling Mix' states that the Council may therefore refuse planning permission for extensions to, or conversions of, existing dwellings where the result will adversely affect the range and mix of dwellings available.

4.19 **Policy H6A** 'Site Threshold for Affordable Housing' notes that in settlements where the population is greater than 3,000, provision of affordable housing will be expected in all residential and mixed development where (a) the site is 0.5 of a hectare or above; or (b) 15 or more dwellings will be provided.

4.20 In relation to the design and built environment, **Policy BDE1** 'Design of New Buildings' the Council will require that new buildings:

(i) respect their setting in terms of scale, proportion, siting, massing, height, orientation, roof-line and detailing;

(ii) are of a size and position such that they adopt a significance in the street scene which is appropriate to their use or function;

(iii) only employ external materials which are sympathetic in colour and texture to the vernacular range of materials.

4.21 **Policy DBE8** 'Private Amenity Space' outlines that new development should provide private amenity that is of a size, shape and nature which enables use and is easily accessible. It should also receive sunlight throughout the year and ideally be situated to the rear of the flats.

4.22 In addition, **Policies DBE2** 'Effect on Neighbouring Properties', and **DBE9** 'Loss of Amenity' seek to safeguard the amenity of surrounding properties and are therefore relevant to the proposed development.

4.23 **Policy ST2** sets out that secure, convenient and sheltered facilities for cycle parking should be incorporated into new development.

4.24 **Policy NC1** sets out that the Council will refuse planning permission for any development or land use change which could directly or indirectly or adversely affect affect Special Areas of Conservation.

4.25 **Policy RP5A** sets out that the Council will not grant planning permission for development where it would cause excessive noise, vibration, or air, ground water or light pollution for neighbouring land uses, protected wildlife species and habitats.

ii) Draft Epping Forest District Local Plan (Submission Version December 2017)

4.26 The Draft Local Plan Submission Version (2017) (LPSV) was submitted to the Secretary of State for Examination in Public on 21 September 2018. Until such time that the LPSV is adopted, the Development Plan for the District is the existing adopted Local Plan (2008) but the LPSV is a material consideration in decision-making. The LPSV will remove a number of the policies within the current plan including some of those referenced above. The relevant policies are provided, below.

4.27 **Policy SP2** 'Spatial Development Strategy' sets out the Council's housing targets for the period 2011 – 2033. Within this period, the Local Plan will provide for a minimum of 11,400 new homes. It is proposed that 1,021 of these will be for Loughton.

4.28 **Policy H1** 'Housing Mix and Accommodation Types' demonstrates that new developments should include a range of house types and sizes. Planning applications will be required to be supported by evidence, proportionate to the nature and scale of development proposed, to justify the mix of new homes to be provided. Such evidence will also need to reflect latest housing needs evidence published by the Council.

4.29 **Policy H2** 'Affordable Housing' states the following:

> **"a) On development sites which provide for 11 or more homes, or residential floorspace of more than 1,000 sqm (combined gross internal area), the Council will require 40% of those homes to be for affordable housing provided on site. The mix of affordable homes will be required to reflect the latest available housing need. All new homes will be required to meet accessible and adaptable homes standards as defined by the Building Regulations applicable at the time of the application…".**

4.30 **Policy DM2** sets out that new residential development likely to have a significant effect on the Epping Forest SAC, either alone or in combination with other development in these areas, will be required to demonstrate that adequate measures are put in place to avoid or mitigate any potential adverse effects.

4.31 **Policies DM9** 'High Quality Design' and **DM10** 'Housing Design and Quality' have also been considered in the design process. DM9 discusses how new development should achieve a high specification of design and contribute to the distinctive character and amenity of the local area. Proposals must relate positively and make a positive contribution to their context and place. They must have regard to the form, scale and massing of buildings surrounding and distinctive architectural styles and should also take account of privacy and amenity of the development's users and neighbours.

4.32 **Policy DM10** outlines how extensions or alterations to residential buildings are required to respect and/or complement the form, setting, period, detailing of the original building noting that matching or complementary materials should be used.

4.33 **Policy DM22** sets out that the Council will seek to ensure that the District is protected from the impacts of air pollution. Adequate mitigation should be provided to ensure that existing and future occupiers, and environmental receptors such as the Epping Forest SAD are not adversely impacted as a result of the development.

c) Planning Policy Summary

4.34 There is a clear planning policy objective at national, London-wide and District levels to optimise the use of previously developed land and to maximize the efficient use of well-located, accessible urban sites. The policies also aim to provide additional residential housing, especially in accessible locations such as this.

4.35 Design-wise, new housing should provide an adequate standard of accommodation, including appropriate room sizes, layout, outlook, daylight and sunlight and overall amenity. New development in general should fit in with the context of the area and surrounding buildings, and should preserve and enhance the character and appearance of surrounding areas.

4.36 As discussed within Section 5, it is considered that the proposals accord with the relevant planning policies at national and local level.

Section 5 Planning Considerations

5.1 The main issues to be considered in respect of this application are:

- Principle of Additional Residential Development;
- Principle of Additional Storey, Design and Visual Impact;
- Housing Mix;
- Standard of Accommodation;
- Neighbouring Amenity;
- Transport Issues and Access;
- Affordable Housing Contributions;
- Air Quality and the Epping Forest SAC.

a) Principle of the Additional Residential Development

5.2 The site is in a highly accessible location within Loughton Town Centre. Although outside of the PTAL zoning map, Loughton benefits from the tube Central Line and several bus routes which the subject site is located in proximity to.

5.3 The approved appeal scheme allowed for a five-storey building and an additional floor to the existing building at the front of the site. Therefore, the principle of the proposed development and residential uses within has already been established as acceptable.

5.4 This application seeks consent for the erection of an additional storey on top of the already approved and implemented scheme to provide 2 no. additional residential flats. National and local planning policy is very clear that the provision of new housing is a priority and the proposals will further assist the Council with its housing targets for the Loughton area.

5.5 The location of the application site for additional residential floorspace is considered to be entirely acceptable. Indeed, within the approved appeal scheme, the Inspector noted (at Paragraph 6 of the Appeal Decision):

> **"The Council accepts the site is in a sustainable location and that the principle of the development is acceptable. From the submissions I see no reason to take a different view".**

5.6 As such, the principle of the proposals is considered to align with the planning policy objectives.

b) Principle of Additional Storey, Design and Visual Impact

5.7 The approved appeal scheme is five storeys in height and this proposal seeks to increase the height by one storey to provide penthouse accommodation. Within the appeal scheme, the Inspector stated (at Paragraph 7):

> **"…In the vicinity of the site there is a wide range of building styles, sizes, roof designs, materials and heights. There are a number of very substantial buildings as well as some very modest ones and the High Road retains a pleasant appearance".**

5.8 He went on to state (at Paragraph 15):

> **""I conclude the proposal would lead to enhancement of the area and that the height of the proposed rear building would not be unduly prominent or overly dominant".**

5.9 We consider that the provision of an additional storey would therefore not be out of keeping with the surrounding area, which is clearly not uniform in appearance.

5.10 In assessing the appeal scheme, the Inspector considered the site to be relatively well screened from the High Road and the new building at the rear of the site would be a considerable distance away from the High Road. The proposed penthouse floor will sit just 1.6 metres above the already approved scheme. The proposed roof terrace is set back a minimum of 1.5 metres from the building line, with the exception of at the north-west corner over the internal stairwell and lift shaft. This set back will reduce its visibility from the High Road.

5.11 A number of drawings have been submitted with this application which show the proposed sight lines of the proposed additional storey. Given that the additional floor will be set back, there are only a few key positions where the roof addition will be 'just seen'.

5.12 The NPPF promotes the use of the airspace above existing residential and commercial premises. It specifies that Council's should allow applications where proposals would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, are well-designed and can maintain safe access and egress for occupiers. Further, the current Local Plan promotes the re-

use of existing buildings by refurbishment, conversions and extensions. There is clearly national and local support for the principle of roof extensions, where they are acceptable in other planning terms.

5.13 As set out above, there is a contrast in building types and heights within the area. The addition of another recessed storey should be considered acceptable given that it is set back from, and at an oblique angle to, the High Road. The massing, scale and height are considered to appropriate given the character of the area, and critically, the additional storey will not appear to be over-dominant. The proposals are therefore considered to comply with the NPPF and Local Policies CS22, BDE1 and SADM30.

5.14 The choice of materials to be used on the roof addition has been considered carefully to ensure that the design of the addition remains in keeping with the lower floors, yet subordinate to the approved building. As such, it is proposed that the set-back façade will comprise of grey metal panelling, which will match the grey panelling at lower floors, along with a bronze balustrade over the parapet walls. In addition, the proposed fenestration will also match the fenestration on the approved building. The proposed materials will be sympathetic in colour and texture to the approved host building and wider area, and as such, the proposals are in accordance with Local Policy BDE1.

c) Housing Mix

5.15 The application seeks the development of a new penthouse floor incorporating 2 x 1-bedroom flats.

5.16 The proposals are considered to complement the mix of housing sizes in the wider area by providing small units, for which there is a demand. The proposed mix is considered acceptable in relation to the scale of development and in accordance with the objectives of Policy H4A.

d) Standard of Accommodation

5.17 New residential developments are expected to provide a good standard of amenity for future occupiers. The proposed flats will meet the national technical space standards of 50sqm for a one-bed apartment (2 persons).

5.18 Both units will have ample access to natural light. With regard to amenity space, both penthouse apartments will be provided with private balconies of 9.5sqm (Flat 'F13') and 6.7sqm (Flat 'F14'). Policy DBE8 outlines that new development should provide private amenity that is of a size, shape and nature which enables use and is easily accessible and it should also receive sunlight throughout the year and ideally be situated to the rear of the flats. The location and orientation of the balconies is considered

to be entirely acceptable given the positioning of the balconies at the approved lower levels. As such, the proposals accord with Policy DBE8.

5.19 The proposals will therefore provide a high standard of accommodation with generous unit sizes, ample access to light and good outlook. As such, the proposals accord with the relevant national and local planning policies.

e) Neighbouring Amenity

5.20 Policy DBE9 is clear that the Council will require that a change or intensification of use, extension or new development does not result in an excessive loss of amenity for neighbouring properties. The factors which will be taken into account are: (i) visual impact; (ii) overlooking; (iii) loss of daylight / sunlight; and (iv) noise, smell or other disturbance. These factors are considered in turn, below.

5.21 Justification for the design of the scheme has already been discussed above, however, every effort has been taken during the design process to ensure that the appearance of the roof addition will appear in keeping yet subordinate to the approved host building. As already referenced, the project architects have prepared drawings as part of the wider pack which demonstrate that the additional storey will only just be seen from a number of vantage points. Given that the additional storey has been set back, and that high quality materials and finishes are proposed, the visual impact upon the area is considered to be negligible.

5.22 In terms of the potential for overlooking, again, given that the proposed additional storey has been set back, that the fifth floor level is set below the parapet, and that the approved appeal scheme was not considered to give rise to overlooking issues, the proposals will not cause overlooking issues for the surrounding occupiers. All proposed fenestration has been sensitively located within the additional part-storey.

5.23 In assessing the appeal scheme, both the Inspector and the case officer considered that the positioning of the appeal building would not result in the loss of daylight or sunlight for the surrounding occupiers. Again, as per the submission drawings, the proposed penthouse addition can only be 'just seen' from the nearest residential occupiers. Given that the additional storey is both set back from the edges of the approved building and is only 1.6 metres higher than the approved scheme, there will not be resultant detrimental loss in daylight or sunlight.

5.24 Finally, given that the proposals relate to additional residential accommodation, which has already been accepted in this location, there will be no issues relating to noise, smell or other disturbance.

f) Transport Issues and Access

5.25 No parking is proposed as part of this development. However, the site is located in a highly accessible area, served by public transport and therefore suitable for a car-free commercial and residential development. The site is in a town centre location with proximity to rail and bus links.

5.26 An additional 6-8 cycle storage space will be provided within the already approved cycle storage area at ground floor level, which will provide a total of 18 – 20 cycle spaces.

g) Affordable Housing Contributions

5.27 Policy H2 of the Draft Epping Forest District Local Plan (2017) sets a target of 40% affordable housing for developments of 11 or more homes. Whilst not adopted, the Council is clear that this policy requirement is a material consideration when assessing planning applications.

5.28 Our Clients engaged the assistance of Adam Roberts Consultancy Ltd, to assess whether a viability appraisal would be required to assess the above policy is respect of the proposed additional two flats. Denny Adam at Adam Roberts Ltd spoke to the Council's Senior Planning Policy Officer, William Harr-Heenan, on 16 November 2018 over the phone to discuss this issue. William Harr-Heenan advised Denny Adam that as long as there are no material amendments to the consented scheme and that the application for the two units is a separate application and not an amendment to the consented, then there would be no affordable housing requirement as the two units are less than 1,000 sqm and fall below the threshold.

5.29 Given that the two additional flats are separate to the implemented scheme, it is therefore considered that the proposed development does not trigger the requirement for an affordable housing contribution.

h) Air Quality

5.30 The proposals within this application simply seek the addition of a part-storey to provide an additional two residential units. Policies DM2 and DM22 of the Draft LPSV set out that the Council will seek to ensure that the District is protected from the impacts of air pollution and that new residential development likely to have a significant effect on the Epping Forest SAC, either alone or in combination

with other development in these areas, will be required to demonstrate that adequate measures are put in place to avoid or mitigate any potential adverse effects.

5.31 Alike the scheme approved at appeal, the proposed development of the additional penthouse floor will be car-free. The application site is located within a highly accessible location for public transport, and as discussed, additional cycle storage will be provided for the proposed occupants. There is no need for future occupiers of the penthouse flats to travel by car and this will work towards the Council's current and forthcoming planning policies in respect of air quality and impact on the Epping Forest SAC.

5.32 As such, the development itself will not give rise to any additional air pollution. The provision of just two additional residential units will not have a detrimental indirect impact on air pollution or on the Epping Forest SAC.

Section 6 Design and Access Statement

6.1 The application proposals seek the extension of the approved appeal scheme to allow for an additional storey, which will be recessed, to provide 2 x 1-bedroom flats. For completeness, a copy of the Design and Access Statement submitted under appeal ref: APP/J1535/W/15/3065764 is attached at Appendix 2.

APPENDIX 2

a) Scale

6.2 The proposed additional storey will be set back from the facades of the approved appeal building, which will ensure that the addition will be read as subordinate to the main building. The footprint and massing of the additional storey has been carefully designed to ensure that the building will not appear bulky as a result of the additional storey.

b) Layout and Amount

6.3 The proposed scheme results in a total of 128 sqm of additional floorspace located across one level.

6.4 The layout of the two additional proposed flats has been given careful thought to ensure that the layout allows for the best quality of accommodation. As a result, both flats will provide accommodation which exceeds the minimum space standards (as set out within the 'Technical housing standards – nationally described space standard'). In addition, both flats will comprise generous external amenity space.

6.5 Each flat will comprise open plan living/dining/kitchen area, a bathroom and bedroom. A substantial amount of circulation space will be provided along with cupboard storage.

c) Appearance

6.6 As discussed above, in designing the proposed extension, it was important to ensure that the additional storey is subordinate to the remainder of the building. As such, the design reflects this. The proposed addition has been set back so that views of the building from a range of vantage points are minimised, as shown on the supporting drawings.

6.7 The proposed grey metal panelling and glazed fenestration will sit comfortably with the appearance of the lower levels. Alike the approved appeal scheme, a flat, green roof is proposed for the roof addition. The proposed balconies at the fifth level will be largely hidden behind the parapet.

d) Landscaping

6.8 With the exception of the new green roof, no additional landscaping is proposed as part of this application.

e) Access

6.9 Access into the building will remain as per the approved appeal scheme. The flats will be accessed via the lift (as approved under the appeal scheme), which terminates at the fourth floor. From there, the proposed flats at fifth floor will be accessed via a separate staircase.

Section 7 Conclusions

7.1 This statement has been submitted in support of a planning application seeking consent for the following development at the rear of no. 165 Loughton High Road:

> ***"Erection of a one storey extension comprising a fifth floor to provide an additional 2 no. flats (2 x 1-bedroom penthouse flats)"***

7.2 This follows on from planning permission which was granted under appeal ref: **APP/J1535/W/15/ 3065764**, which has been implemented and is being built out.

7.3 Consent was granted for the construction of a 5-storey building with 12 flats at the site, therefore, the principle of residential accommodation in this location has been established. The provision of two additional flats will help towards the Council's new housing targets, as proposed within the Draft Epping Forest District Local Plan. As such, the addition of these two units should be considered acceptable in principle.

7.4 The NPPF and local policy promotes the use of the airspace above residential premises. The extension has been designed so that it is set back from the building line of the implemented scheme and will comprise an additional height of just 1.6 metres. The scale, massing and appearance of the proposed extension are considered to be appropriate for the host building and wider area.

7.5 The proposed addition has been carefully designed to ensure that there is no adverse impact on the residential amenity of surrounding occupiers in terms of overlooking, visual impact, loss of daylight/ sunlight and noise and other disturbance.

7.6 The housing mix and standard of accommodation comply with national and local requirements for residential accommodation.

7.7 Additional cycle storage and refuse bins will be incorporated within the existing storage areas at ground floor level, as per the implemented appeal scheme. No parking is proposed as part of this application, therefore there will be no additional pressure on the road network. The site is in a highly accessible location with good rail and bus links.

7.8 A conversation between Adam Roberts Ltd and the Senior Planning Policy Officer at the Council has confirmed that an affordable housing contribution would not be required in respect of the proposals.

7.9 The proposals will not lead to any detrimental impact on air quality or on the Epping Forest SAC.

7.10 The proposals are consistent with national and local planning policy. As such, we respectfully request that planning permission is granted.









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Appendix 1

Photographs of the Application Site



Photograph 1: Application Site at rear of 165 High Road



Photograph 2: Rear part of Application Site



Photograph 3: 165 High Road and Part of Application Site



Photograph 4: Parking to rear of Application Site



Photograph 5: 165 High Road viewed from High Beech Road



Photograph 6: 165 High Road viewed from North



Photograph 7: 165 High Road viewed from South