

**DR/36/23**

**Report to:** DEVELOPMENT & REGULATION (27 October 2023)

**Proposal:** COUNTY COUNCIL DEVELOPMENT – Demolition of the existing building and the construction of new part 5/part 4/part 3 storey building to provide (i) a public library; (ii) space for offices, community use and Jazz Archive; (iii) the provision of 38 residential apartments; and (iv) associated access, parking, servicing, utilities, and landscaping

**Ref:** CC/EPF/88/22

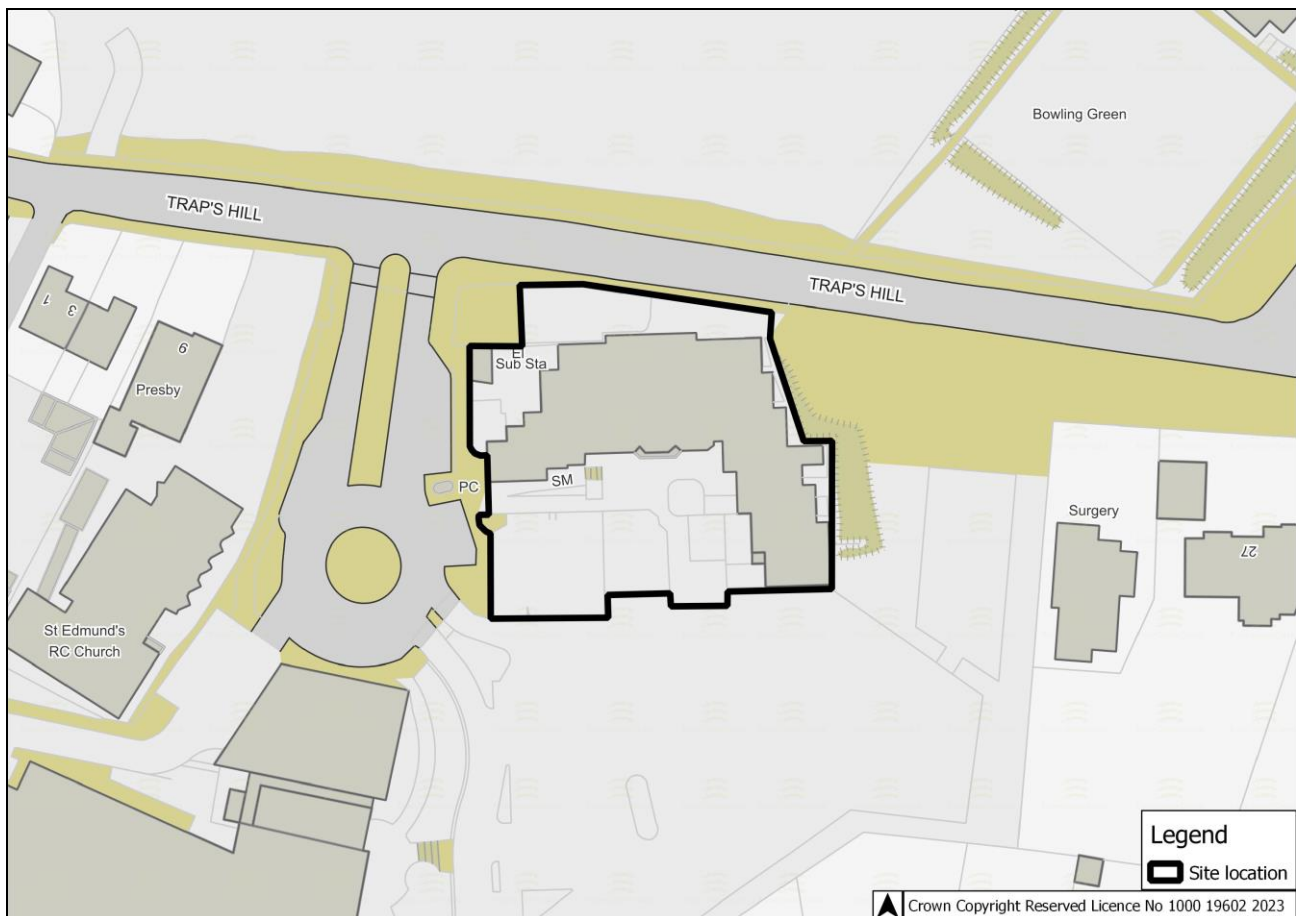
**Applicant:** Essex County Council

**Location:** Loughton Library, Traps Hill, Loughton, Essex, IG10 1HD

**Report author:** Chief Planning Officer (County Planning and Major Development)

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The full application can be viewed at <https://planning.essex.gov.uk>



## 1. SITE

This application relates to an area of land measuring approximately 0.25 hectares which is currently occupied by a building predominately used as a public library. The site is located on Traps Hill in Loughton, to the east of a road that provides access to Traps Hill Car Park (owned and managed by Epping Forest District Council) and Loughton Leisure Centre. To the west of the site, beyond the aforementioned access road, is St Edmund of Canterbury Catholic Church. To the east of the site, beyond an area of open space (incorporating a children's play area) is Loughton Surgery beyond which are residential properties. To the north, on the other side of Traps Hill, is Loughton Cricket Club and Bowling Club.

The existing building is part two/part three storey and is concrete framed with brick cladding and metal framed double glazed windows. The building has a flat felted and asphalt roof and was constructed in the late 1960s/early 1970s although has been adapted/modified more recently.

Photo of the existing building from Traps Hill



Traps Hill slopes east to west, towards Loughton town centre. The existing building is constructed into this slope, such that it is set below ground level on its eastern side (where closest to the adjacent public open space and Loughton Surgery). The car park to the rear is also set on higher ground.

Photos of the site showing the slope on Traps Hill (east to west) and the existing building



There are a number of trees within close proximity of the site including a mature Common Ash, located by the western corner of the building, and two large Silver Maple trees to east within the adjacent public open space. Within the site itself, to the rear of the building is a mature (Grade A) English Oak.

The site forms part of the Loughton town centre boundary and is allocated for re-development within the Epping Forest District Local Plan 2011-2033. The allocation (ref: LOU.R7) outlines a proposed residential development with an indicative net density of 81 dwellings per hectare / 20 dwellings. The allocation details the proposal must incorporate an on-site replacement of the existing library at ground floor level. In addition the proposals should incorporate suitable accommodation for Loughton Town Council.

The nearest residential properties to the site are those to the east of the site, past Loughton Surgery, on Traps Hill.

With regard to other designations, the site is not located within a conservation area, albeit the York Hill conservation areas commences to on the north-western side of the cricket pitch (Kings Green, High Road, York Hill junction). The nearest listed building, to the site, is 2 Traps Hill (Grade II). This building which is an early 19<sup>th</sup> Century Stuccoed brick house with slate roof is located on the northern side of the junction with High Road – and is currently occupied by an insolvency practitioner.

The site is approximately 300m, as the crow flies, from Epping Forest and the southern edge of the Special Area of Conservation boundary associated.

The existing building has been approved, by Epping Forest District Council, as an asset of community of value under the Localism Act 2011 (as amended).

## **2. PROPOSAL**

This application seeks planning permission to demolish the existing building and construct a part five, part four, part three storey building to (i) a public library; (ii) space for offices, community use and the National Jazz Archives; and (iii) the provision of 38 residential apartments above. The proposals are supported by a range of works to access, parking, servicing, utilities, and landscaping.

With regard to the above, it is proposed that the ground floor of the building would predominantly comprise library space. However, on the ground floor would also be space for the Town Council and the National Jazz Archive, together with community space, meeting rooms and public and staff facilities. The main entrance to the library is proposed on the south elevation, and not from the frontage onto Traps Hill, as per the existing arrangements. A landscaped courtyard is proposed to compliment the library entrance point whilst doubling up as an external area for users of the library, occupiers of the residential units and the public alike to utilise.

On each of the first and second floors of the building 12 residential flats are proposed, a mix of 1 bedroom, 2 person; 2 bedroom, 3 person; and 2 bedroom, 4 person units. On the third floor 8 units are proposed, a mix of 2 bedroom, 3 person; and 2 bedroom, 4 person units and on the fourth floor six unit are proposed, a mix of 2 bedroom, 3 person; and 2 bedroom, 4 person units. The development would comprise 38 flats in



total. No affordable housing is proposed, with all units proposed for private ownership.

The main access to the residential flats is proposed via an entrance core located on the west elevation of the building. Secondary external access staircases to the residential floors are nevertheless also proposed off/into the external courtyard.

A basement level is proposed to provide car parking for the residential units, which would be accessed from Traps Hill. 37 car parking spaces would be provided, with one space being allocated to each residential unit, within the exception of one which would have no parking provision. At the basement level would also be various plant rooms supporting the development, together with a sprinkler water tank store.

The development is proposed with flat roofs which would be covered in solar panels, with the exception of an area of the roof which is proposed to house the plant and equipment associated with the air heat pump system.

As shown on the below visualisations, the building is proposed to be constructed in brick, with a ribbon of glass wrapping the building on the ground floor (library level). The use of two types of brick, a darker variant on the top floor and on the east elevation, with some render is proposed to break up the mass of the building.

#### Visualisation of the proposed development along Traps Hill



#### Visualisation of the side and rear elevation of the proposed development



### 3. POLICIES

The following policies of the Epping Forest District Local Plan 2011-2033 (adopted February 2023) provide the development plan framework for this application. The following policies are of relevance to this application:

#### Epping Forest District Local Plan 2011-2033 (2023)

##### Part 1

SP1 – Spatial Development Strategy 2011-2033

SP2 – Place Shaping

SP6 – The Natural Environment, Landscape Character and Green and Blue Infrastructure

H1 – Housing Mix and Accommodation Types

H2 – Affordable Homes

T1 – Sustainable Transport Choices

DM1 – Habitat Protection and Improving Biodiversity

DM2 – Epping Forest SAC and the Lee Valley SPA

DM3 – Landscape Character, Ancient Landscapes and Geodiversity

DM7 – Historic Environment

DM9 – High Quality Design

DM10 – Housing Design and Quality

DM11 – Waste Recycling Facilities in New Development

DM12 – Subterranean, Basement Development and Lightwells

DM15 – Managing and Reducing Flood Risk

DM16 – Sustainable Drainage Systems

DM18 – On-Site Management and Reuse of Waste Water and Water Supply

DM19 – Sustainable Water Use

DM20 – Low Carbon and Renewable Energy

DM21 – Local Environmental Impacts, Pollution and Land Contamination

DM22 – Air Quality

P2 – Loughton

D1 – Delivery of Infrastructure

D2 – Essential Facilities and Services

D3 – Utilities

D4 – Community, Leisure and Cultural Facilities

##### Part 2

LOU.R7 – Loughton Library

The National Planning Policy Framework (NPPF) (2023) and sets out the Government's planning policies for England and how these should be applied. The NPPF highlights that the purpose of the planning system is to contribute to the achievement of sustainable development. It goes on to state that achieving sustainable development means the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways: economic, social and environmental. The NPPF places a presumption in favour of sustainable development. However, paragraph 47 states that planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.

For decision-taking the NPPF states that this means; approving development proposals that accord with an up-to-date development plan without delay; or where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless: the application of policies in this NPPF that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this NPPF taken as a whole.

Paragraphs 218 and 219 of the NPPF, in summary, detail that the policies in the Framework are material considerations which should be taken into account in dealing with applications and plans adopted in accordance with previous policy and guidance may need to be revised to reflect this and changes made. Policies should not however be considered out-of-date simply because they were adopted or made prior to the publication of this Framework. Due weight should be given to them, according to their degree of consistency with this Framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given).

The Epping Forest District Local Plan was adopted this year (2023) and as such is considered to be up to date. There has been a revision to the NPPF since the Plan was adopted however it is not considered that the revisions made unduly impact on the considered compliance of the Plan with the NPPF.

#### **4. CONSULTATIONS**

Summarised as follows:

EPPING FOREST DISTRICT COUNCIL – Object. The Council are of the opinion that the proposal would significantly conflict with the policy requirements of the Local Plan and NPPF.

The proposed 38 units is some 18 units over the approximate capacity for this site allocation (ref: LOU.R7) within the Local Plan. It is accordingly considered that it is the applicant's responsibility to demonstrate that the proposal would not result in a harmful overdevelopment of the site with regard to concentration and quantum of development along with, layout, scale and physical appearance.

The Council, in this regard, supports concerns raised by Place Services (Historic Buildings) in terms of potential impact of the development on nearby heritage assets. And strongly recommends that the proposals be independently reviewed by the Quality Review Panel.

Specific comments are also provided covering the below:

Affordable housing: It is queried why affordable housing can't be delivered when there is a developer profit of some 17.5% (private) and 15% (commercial) totalling approximately £3.34 million.

Highways and parking provision: Concerns raised in that this is considered a highly sustainable location and further opportunities to reduce the reliance on private vehicles should have been explored. The Council are not suggesting a car free

development but the level of parking proposed is still substantial and supports the suggestion of this being a harmful overdevelopment of the site.

Infrastructure: The Council have not seen any comments from the Essex County Council's Infrastructure Delivery department which seeks to confirm no education contributions would be required. So, an objection in this regard is raised.

**EPPING FOREST DISTRICT COUNCIL'S CONSULTANTS REVIEW OF THE APPLICANT'S HABITAT REGULATION ASSESSMENT** – Satisfied that the impacts on Epping Forest Special Area of Conservation would be mitigated by the measures summarised below:

- Financial contribution per household as per the Air Pollution Mitigation Strategy;
- ULEV only parking for the 18 additional residential units;
- 50% (or a min. of 10) of the other residential parking spaces to include EV charging provision, with the ability to extend EV provision to all residential parking spaces;
- Cycle parking as submitted;
- Residential Welcome Packs to include Travel Packs identifying active travel and public transport facilities and services, while also including 6 one-day travel vouchers for local bus services; and
- Staff Travel Plan including travel information of active travel facilities and public transport services for staff and customers.

**THE COUNCIL'S INFRASTRUCTURE DELIVERY DEPARTMENT** – The development is expected to generate the need for up to 1.44 Early Years and Childcare places; 4.8 Primary school places; and 3.2 Secondary school places. However, no financial contribution towards educational facilities is required at the current time. In addition, in context of the distance to the nearest schools, no school transport contribution is sought.

With regard to other potential contributions, as this proposal includes the provision of a library service, it is not considered appropriate to request an additional contribution towards a library facility. However, it is considered that a Employment and Skills Plan should be secured should planning permission be granted.

**THE COUNCIL'S INDEPENDENT VIABILITY CONSULTANTS** – There is small differences in outputs based on modelling undertaken, in comparison to that suggested by the applicant. However, overall the project deficit is still considered to be circa £4.9 million. This being case and based on the enabling development approach being accepted, no objections are raised to the conclusions drawn including the zero provision of affordable housing.

**THE COUNCIL'S VIABILITY OFFICER (Informal comments only)** – The conclusions of the independently commissioned review of viability should be considered with confidence.

**THE COUNCIL'S URBAN DESIGN, LANDSCAPE, HISTORIC BUILDINGS, ARCHAEOLOGY, ECOLOGY AND TREE CONSULTANTS**

Urban Design – No objection. It is considered that the amendments made to the development have helped to break up the appearance of the building. Some

reservations or concerns remain with regard to materials, as shown on the drawings submitted, and accordingly a condition seeking final specification and application of all external materials and finishes is recommended.

Landscape – No objection. The proposal successfully creates a central open courtyard space around the retention of the Oak tree. It is considered disappointing that the wider landscaping/public realm works, shown on the drawing submitted, do not form part of the proposals.

Historic Buildings – The amendments/refinements made to the development, during the course of determination, have improved the proposals. However, it is considered that the development would result in harm, at the lowest end of less than substantial, to the conservation area. This harm accordingly needs to be weighed against the public benefits of the proposal as per paragraph 202 of the NPPF.

Archaeology – No objection.

Ecology – No objection subject to conditions securing biodiversity improvements as part of the proposals.

Trees – No objection. Two trees would be required to be removed to facilitate these proposals. One tree is Category U and the other is a Category C. The value of these two trees is low and as such can be offset by proposed replacement planting. There are several significant category A and B trees on site or within close proximity that will require suitable protection throughout the course of the development. Conditions in this regard are recommended should planning permission be granted.

HIGHWAY AUTHORITY – No objection subject to conditions requiring submission of a Construction Management Plan; all access arrangements, vehicle parking and turning area being provided, hard surfaced, sealed and marked out prior to first occupation; provision of cycle facilities, as proposed, prior to first occupation; and provision, implementation and distribution of a Residential Travel Information Pack.

LEAD LOCAL FLOOD AUTHORITY – No objection subject to conditions securing submission of a detailed surface water drainage scheme; and a maintenance plan for the aforementioned.

NATURAL ENGLAND – No comments received.

ESSEX FIRE & RESCUE – Initial comments provided with regard to access requirements. However, it is confirmed that further observations on access and any need for new facilities for the Fire Service would be considered at Building Regulations consultation stage.

ESSEX POLICE – No comments received.

NHS (HERTFORDSHIRE AND WEST ESSEX INTEGRATED CARE BOARD) – This development would have an impact on primary/secondary healthcare provision in the area, and its implications, if unmitigated, would be unsustainable for the NHS. The HWEICB accordingly seek a financial contribution of £59,093, if planning permission is granted, to assist in ensuring sufficient primary healthcare services are available in the



area.

PIPELINE / COMMUNICATION / UTILITY COMPANIES – Either no comments received; no objection; no objection subject to standard advice; or no comments to make.

LOUGHTON TOWN COUNCIL – Object. The proposal is considered an overdevelopment, by reason of its built and height. A five storey building is considered excessive and would set an unwelcome precedent. The development would be out of character and negatively impact on the street scene.

There is no objection in principle, to a proposal for residential properties, particularly if such a scheme included affordable housing. However, 38 dwellings are too many and there is no affordable provision.

The Parish Council supports the comments of the Loughton Residents Association Plans Group.

LOCAL MEMBER – LOUGHTON CENTRAL – Object. The basis of objection is still the reasons for my call-in of the decision to go ahead with this project, made before the Corporate Policy and Scrutiny Committee in August 2019. Concerns raised include:

- The deleterious effects of extra flats on Epping Forest SAC. The Habitat Regulations Assessment is defective and relies on the interim Air Quality Management Scheme. The *Holohan* judgement makes it clear that to consent this proposal would be unsafe and unsound, if not directly unlawful, and would invite immediate judicial review.
- The embodied carbon in the present building is considerable and should be encapsulated by upgrade and refurbishment, not demolition.
- The existing building is distinctive, designed by J Elidir Davis a national library architects of the 1970s. It is a notable building which should constitute and be viewed a heritage asset (albeit unlisted).
- The proposed reduction in space for the library would result in a cramped facility. The Town Council has already decided to move and as such the civic integrity of the building is already being undermined.
- No plans are outlined for a temporary library during the construction period.
- The proposed car parking provision will exacerbate the number of vehicles to be kept by new residents.
- There is no affordable housing.
- The proposal is not supported locally.

## **5. REPRESENTATIONS**

39 properties were directly notified of the application. The application was also advertised by way of site notice and press advert. 96 letters of representation (objection) have been received, including the letter from Loughton Residents Association as referred within the Town Council's representation. A summary of representations received is provided in Appendix 1, with the headline issues or concerns raised considered to be:

- This is an over-development of the site;
- The proposed building is out of character and is far too tall and bulky;

- Impacts on Epping Forest SAC;
- Impacts on highway safety and efficiency;
- Impacts on nearby heritage designations;
- Additional pressure on infrastructure and services;
- No affordable housing;
- The existing building is not very old, is fit for purpose and could be refurbished; and
- The replacement library would be smaller, more cramped and less flexible than the existing one.

## 6. APPRAISAL

The key issues for consideration are considered to be:

- A. Principle of Development
- B. Schedule of Accommodation/Library Space, Density and Housing Mix
- C. Design and Landscaping
- D. Epping Forest Special Area of Conservation
- E. Heritage
- F. Highways
- G. Sustainability, Flood Risk/Drainage and Basement Impact Assessment
- H. Financial Viability and Contributions

### A PRINCIPLE OF DEVELOPMENT

This site is allocated for mixed use development, within the Epping Forest District Local Plan. Policy P2 states that proposals for development on allocated sites should accord with the site specific policy requirements as set out in Part Two of the Plan. Part Two of the Plan details in respect of this allocation (ref: LOU.R7) that the site has an approximate net capacity for 20 dwellings, at an indicative net density of 82 dwellings per hectare. With regard to design, it is outlined that the development proposals must incorporate on-site replacement of the existing library at ground floor level. Any proposals should also incorporate suitable accommodation for Loughton Town Council. In terms of infrastructure, the site within Loughton High Road Town Centre which is considered a sustainable location with good public transport accessibility. Measures must be adopted to promote sustainable transport modes and encourage active transport. Such measures should include: (i) limiting the provision of on-site residents' parking to that required to service the essential needs of the development, such as visitor parking and parking for blue badge holders; (ii) on-site provision for car clubs/car sharing or pooling arrangements; and (iii) providing contributions for implementing/amending Controlled Parking Zones on-site and/or in the vicinity of the site as necessitated by the development proposals.

Essex County Council's Cabinet in July 2019 approved the Essex Future Library Services Strategy 2019-2024. The Strategy approved was amended following public consultation on an earlier version or draft which had originally identified the potential closure of several libraries across the County. Within the adopted Strategy, Loughton Library is identified as a Tier 1 library which is a library where ECC offer a comprehensive and efficient service to meet its statutory duty.

This Strategy principally concerns the library service and not the buildings from which the service is offered. That said, the Strategy does state that ECC *"will work in*

*partnership to make the most efficient use of public buildings, whether owned by the council, public bodies or community organisations. Most library services will be in shared spaces by 2024. Once library locations have been placed in tiers, we will review running costs and the condition of library buildings in Tier 1 and 2 with a view to bringing all services up to a consistent, modern standard and finding the most effective ways to respond to local needs. This includes considering most appropriate location for the service. In future, library services could be provided from a range of outlets, such as shared locations with other services, new spaces provided as part of housing or retail developments or co-located in community centres, shops, leisure centres or other locations. We would expect community libraries would be run from premises owned or paid for by the community groups. Buildings that are no longer required by the library service will be incorporated into the council's property strategy."*

The existing building to which the library is provided from has been suggested by the applicant as needing substantial maintenance, in order to continue to ensure that the accommodation provided is fit for purpose. Careful consideration was given as to whether to invest a significant sum of money into refurbishment works. However, in context that the library, as existing, was not considered optimal – in that that the library is currently split over two floors, a significant amount of floorspace is lost for circulation and office accommodation is dispersed which gives rise to management issues, it was considered a comprehensive re-development of the site would provide a better and more sustainable option.

In context of the allocation within the Local Plan, it is not considered that a land use planning objection exists to a mixed-use re-development coming forward on this site. The proposals as put forward, as required, maintain a library use and would also provide accommodation for Loughton Town Council. In this regard, no in-principle objection in context of policy D4 is considered to exist. That said, in view that a smaller library is proposed in comparison to existing the suitability of the proposed provision library provision is discussed in more detail in the report. As is, the proposals seek 18 more residential units (38 in total) in comparison to the indicative figure (20) suggested in the Local Plan. In this regard, it is noted that consideration needs to be given to whether the proposals represent overdevelopment of the site.

## **B SCHEDULE OF ACCOMMODATION/LIBRARY SPACE; AND RESIDENTIAL DENSITY AND MIX**

As existing the building has a gross internal area of 1934m<sup>2</sup> with floorspace occupied and used by a range of different organisations. With regard to the library use, drawings submitted with this application shown approximately 529.84m<sup>2</sup> of floorspace on the ground floor being formally used as the adult/children's library area, with an additional 278.58m<sup>2</sup> of floorspace on the first floor being used for the reference library. It is understood that the total floorspace allocated for the library function within the building is 846m<sup>2</sup>. The area used by the National Jazz Archive is 77.75m<sup>2</sup>, with the Town Council Offices comprising 75.34m<sup>2</sup> of floorspace.

The building proposed by way of this application, would on its ground floor provide some 1,307m<sup>2</sup> of floorspace which is proposed to be shared by the library, the National Jazz Archive and the Town Council. Areas on the ground floor, as part of the development, are also proposed for community use (an area of community space); meeting rooms; public and staff toilets; and staff facilities, office and storage. In

comparison to the existing building, additional floorspace as part of the development would be allocated to the National Jazz Archive and the Town Council. However, the size of the space afforded to the library would be reduced. The change in floorspace provision is shown in the below table:

#### Floorspace Provision – Existing vs Proposed

	<b>Existing</b>	<b>Proposed</b>
<b>Library</b>	846m <sup>2</sup>	716m <sup>2</sup>
<b>National Jazz Archive</b>	77.75m <sup>2</sup>	88m <sup>2</sup>
<b>Town Council</b>	75.34m <sup>2</sup>	87m <sup>2</sup>

With regard to the above, the applicant has sought to suggest that the space requirements to run and operate the library have been discussed and agreed with the Council's library service. And, whilst the library would be smaller, the applicant has confirmed that this would not result in a reduction in services offered. The applicant has simply suggested that a lot of space within the existing building, allocated to the library function, is either under used or not usable, to the point that an equivalent sized library is being provided. In context of this and that the requirements to operate a Tier 1 library from this location have been agreed with the Council, as library provider, no objections are raised purely from a library size perspective. In terms of the spaces provided for the National Jazz Archive and Town Council, it is noted that a minor increase in floorspace provision would be provided for both. The Town Council's consultation response makes no comments with regard to the floorspace allocated in this regard. However, a letter from the National Jazz Archive (provided by the applicant) confirms full support for the proposed re-development with the trustees of the Archive suggesting *"it will greatly enhance the value and utility of this important community asset for the local and wider community. It will make far better use of the current space, and it will do great credit to Essex County Council and its contribution to our cultural landscape"*. No objections are therefore raised to the overall accommodation schedule of the proposed ground floor, with it considered that the proposal in this respect fully complies with the requirements of policy P2 and LOU.R7.

Turning to the residential use, with a site area of 0.25ha and 38 dwellings, this application proposes a density equating to 152 dwellings per hectare. Policy SP2 of the Local Plan seeks, in part, to ensure proposals result in the best and most efficient use of land. The policy suggests that as a guide the Council would expect a greater density of development at places with good public transport accessibility. Densities above 50 dwelling per hectare would accordingly be expected in towns and large village centres, and along main transport routes and/or close to transport nodes.

Concerns have been raised by Epping Forest District Council in terms of whether the proposal represents an overdevelopment. However, density is a numerical form of assessment. The NPPF at paragraph 125 advocates that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site. Expanding, it is outlined that local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in the NPPF.

Accepting the above, it is considered it would be inappropriate to suggest this is an overdevelopment of the site purely because of the proposed density. An assessment of the development in context of its locality, design and the standard of living which would result for occupiers is considered necessary.

Initially, in this regard the below table seeks to confirm the Gross Internal Area of each flat and their proposed occupation capacity.

<b>Unit</b>	<b>GIA (m<sup>2</sup>)</b>	<b>Bed Spaces</b>	<b>Balcony/Terrace</b>
1	53	1 bed, 2 person	Yes
2	75	2 bed, 4 person	Yes
3	53	1 bed, 2 person	Juliet
4	53	1 bed, 2 person	Juliet
5	66	2 bed, 3 person	Yes
6	64	2 bed, 3 person	Yes
7	77	2 bed, 4 person	Yes
8	77	2 bed, 4 person	Yes
9	77	2 bed, 4 person	Yes
10	77	2 bed, 4 person	Yes
11	77	2 bed, 4 person	Yes
12	76	2 bed, 4 person	Yes
13	53	1 bed, 2 person	Yes
14	75	2 bed, 4 person	Yes
15	53	1 bed, 2 person	Yes
16	53	1 bed, 2 person	Yes
17	66	2 bed, 3 person	Yes
18	64	2 bed, 3 person	Yes
19	77	2 bed, 4 person	Yes
20	77	2 bed, 4 person	Yes
21	77	2 bed, 4 person	Yes
22	77	2 bed, 4 person	Yes
23	77	2 bed, 4 person	Yes
24	76	2 bed, 4 person	Yes
25	79	2 bed, 4 person	Yes
26	67	2 bed, 3 person	Yes
27	66	2 bed, 3 person	Yes
28	64	2 bed, 3 person	Yes
29	77	2 bed, 4 person	Yes
30	77	2 bed, 4 person	Yes
31	77	2 bed, 4 person	Yes
32	77	2 bed, 4 person	Yes
33	67	2 bed, 3 person	Yes
34	67	2 bed, 3 person	Yes
35	83	2 bed, 4 person	Yes
36	77	2 bed, 4 person	Yes
37	77	2 bed, 4 person	Yes
38	77	2 bed, 4 person	Yes

The proposed overall mix of units, across the proposal, is as below:

Unit Type	Total Number of Units	Overall Percentage of Development
1 bed, 2 person	6	15.8%
2 bed, 3 person	9	23.7%
2 bed, 4 person	23	60.5%

Policy H1 of the Local Plan details that development will be permitted where the mix of new homes: (i) includes a range of types, tenures and sizes to address local need including for 'down-sizing', housing for older people, and specialist housing as appropriate; (ii) is appropriate to the size, location and characteristics of the site and its surroundings; (iii) takes into account the existing housing stock in the settlement, rural community or neighbourhood in order to avoid any over-concentration of a single type or size of home, or specialist accommodation, where this would undermine the achievement of creating mixed and balanced communities; (iv) allows for community-led approaches such as co-housing and co-operatives where appropriate; and (v) provides for all new homes to be built in accordance with Building Regulations Requirement M4 (2) Accessible and Adaptable Dwelling standards. Policy DM10 expands, in part, that all new housing development should meet or exceed the minimum internal space standards set out in the latest Nationally Described Space Standards, with family housing on upper floors having access to a balcony and/or terrace of a useable size, subject to acceptable amenity, privacy and design considerations.

Extract from Technical Housing Standards – Nationally Described Space Standard (2015)

**Table 1 - Minimum gross internal floor areas and storage (m<sup>2</sup>)**

Number of bedrooms(b)	Number of bed spaces (persons)	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
1b	1p	39 (37) *			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	
5b	6p	103	110	116	3.5
	7p	112	119	125	
	8p	121	128	134	
6b	7p	116	123	129	4.0
	8p	125	132	138	

As part of this development, no flats with more than 2 bedrooms are proposed. Accordingly, it is not considered that the proposed housing mix is necessarily representative of a broad mix of accommodation types. That said, in view of the type of development proposed, and that larger 3 or 4 bedroom units may not be overly



desirable, no objections are raised to the proposed housing mix. In this regard, it is noted that all units would comply with the Technical Housing Standards – Nationally Described Space Standard (2015), in terms of gross internal floor area, and would be built in accordance with Part M4 (2) of Building Regulations, in accordance with policy DM10 of the Local Plan.

## C DESIGN AND LANDSCAPING

Policy SP2 of the Local Plan details that all development proposals must reflect and demonstrate that the following place shaping principles have been adhered to having had regard to their relevance within the context of the scale and nature of the development proposed (only those relevant to design and landscaping are detailed): v) provide high quality and imaginatively designed homes with gardens or access to usable and accessible amenity space, combining the very best of urban and rural living to promote healthy and active lifestyles and vibrant communities; vi) ensure generous, well connected and biodiverse rich green and open space provision; vii) extend, enhance and reinforce strategic green and blue infrastructure assets and the public realm; viii) ensure that development enhances the natural environment; ix) ensure that development enhances the natural environment; xi) maintain and enhance the important features, character and assets of existing settlements; xii) conserve and positively enhance key landscapes, habitats and biodiversity; xiii) provide for sustainable movement and access to local and strategic destinations (including rail, bus, walking and cycling); and xiv) positively respond to sustainable water management.

Policy DM9 expands that all new development must achieve a high quality 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, drawing on the local character and the natural and historic environment; (ii) make a positive contribution to a place; (iii) incorporate sustainable design and construction principles that integrate adaptation and mitigation measures to address climate change; (iv) are planned to minimise vulnerability to climate change impacts and which will not exacerbate vulnerability in other areas; (v) incorporate design measures to promote healthy communities and individuals, reduce social exclusion, the risk of crime, and the fear of crime; and (vi) enable/encourage healthy and active lifestyles.

Specifically with regard to design standards, landscaping and the public realm, policy DM9 continues that proposals must relate positively to their locality, having regard to: (i) building heights; (ii) the form, scale and massing around the site; (iii) the network of routes and spaces connecting locally and more widely; (iv) the rhythm of any neighbouring or local plot and building widths and, where appropriate, existing building lines; (v) the need to provide active frontages to the public realm; and (vi) distinctive local architectural styles, detailing and materials. In addition, development proposals must demonstrate how landscaping and planting has been integrated into the development as a whole. The Council will expect development proposals to respond to: (i) the topography of the site and its surroundings; (ii) trees on and close to the site; (iii) natural or historic boundary features; (iv) the biodiversity of the site and its surroundings; and (v) the need to maximise the use of permeable surfaces. Where appropriate development proposals must contribute positively to the public realm and to any public spaces to which it is physically or functionally connected.

## Proposed Building Layout

The building proposed as part of this application would form a rough 'U' shape and comprise five floors (including the ground floor) and an additional basement car park. In terms of the use of each floor, the rationale is relatively simple in that the library and ancillary uses are proposed on the ground floor, with the residential units then proposed on the four floors above.

As shown on the below layout plans, a vehicular access to the basement car park is proposed off Traps Hill with pedestrian accesses to the residential units from west and south elevations. The main residential entrance core would be on the western side of the building. This core would provide access to all residential levels via a stairwell and lift. To support this main residential core, two secondary staircases which would be accessible from off the courtyard are proposed. The flats themselves, within the western projection of the building, would be accessed via internal central corridor. The flats along the northern projection (the projection facing out towards Traps Hill) would be accessed via an open deck as would the flats proposed in the eastern projection.

The library would be accessed from the east elevation of the western projection of the building.

## Extract from drawing titled 'Proposed Ground Floor Plan – Library Level'



### Extract from drawing titled 'Proposed First Floor and Second Floor Plans'



First Floor Plan



Second Floor Plan

### Extract from drawing titled 'Proposed Third and Fourth Floor Plans'



Third Floor Plan



Fourth Floor Plan

Landscaping is discussed in more detail later in this appraisal. However, initially with regard to the building layout, it is noted that Epping Forest District Council have sought to question the location of the library entrance. In their view, the library has very limited presence on Traps Hill and there are concerns around legibility. Accessing the library entrance via a ramp and/or via the public car park through the external courtyard is not, in their opinion, reflectively of the legibility expected for a public building. It is questioned if alternative entrances to the library have been considered.

In addition, EFDC consider the main residential entrance core, on the western elevation, to lack presence and a sense of arrival. It is considered that this entrance should be expressed more thoroughly for example changes in fenestration or materials. Disappointingly, it is also raised that limited ground level activity/interest has been introduced along the western elevation, as part of the proposals.

With regard to the residential units, concern is also raised by EFDC with regard to the provision of just one primary residential core access. The supporting accesses are noted. However, it is considered by EFDC that the width of corridors and decks are

such that these could be tight circulation spaces, contrary to the aspirations of policy DM9 and the requirement for development to not be over-bearing and/or overly enclosed. The proposal also includes several single aspect dwellings and concerns are raised as to if all units would, as such, provide good sunlight, daylight standard as also required by policy DM9.

### Proposed Scale and Massing

As previously detailed, the building proposed would be five storey at its highest point. The proposed mass of the building has attempted to be broken up through a stepped building form and recessed top floor. The below elevations shown how the building is proposed to be constructed into the slope/gradient change on Traps Hill. The applicant has sought to suggest that proposed scale and massing of the building responds to its context, in that the lowest part of the building is to the east adjacent to the open space and more residential property scale of development along Traps Hill, with the tallest part of the building, on the north-west corner junction, providing the building with landmark or wayfinding characteristics from the High Street to the west.

### Extract from drawing titled 'Proposed North Elevation'



### Extract from drawing titled 'Proposed East Elevation'

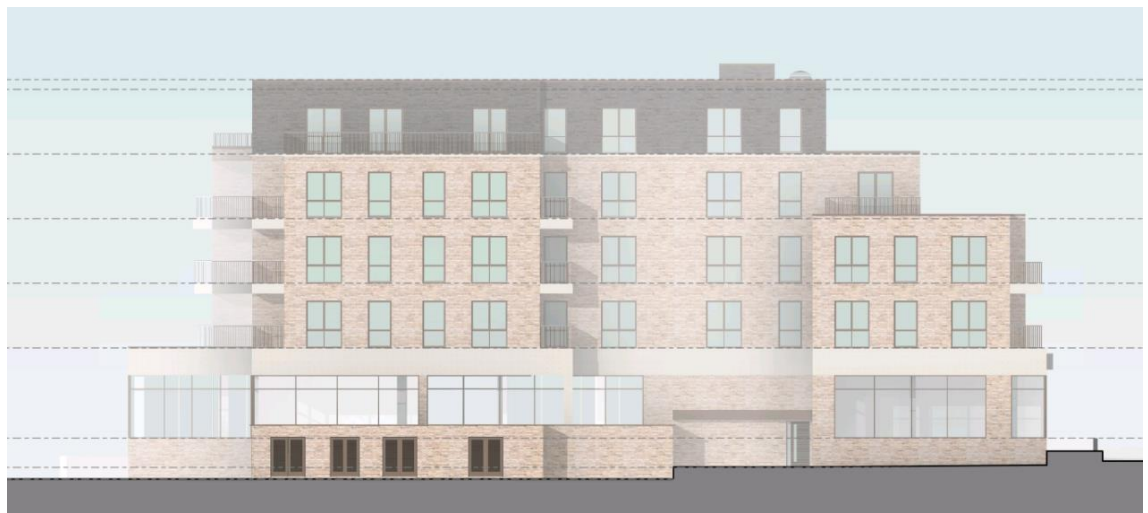




Extract from drawing titled 'Proposed South Elevation'

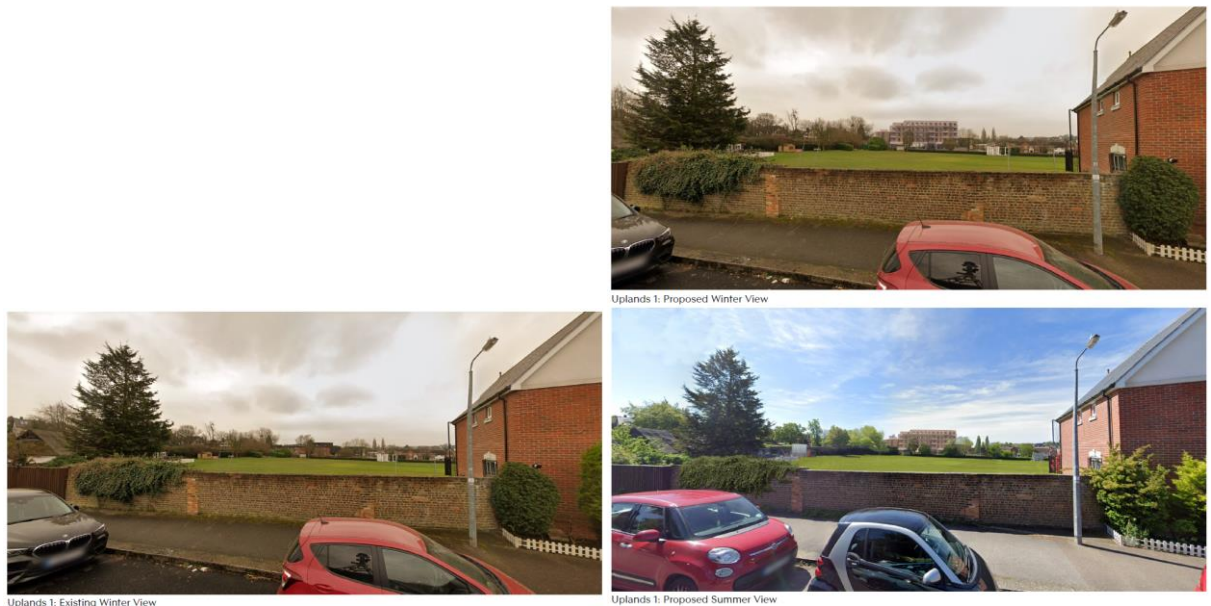


Extract from drawing titled 'Proposed West Elevation'



At five storey this development would be significantly larger than that which already exists in the street scene and concern has been raised, as part of representations received about the visual impact of the development in the locality. A key view raised was that, towards the development, from the cricket pitch. The applicant accordingly provided a photo montage comparison of this view with the development in situ. This comparison, replicated below, clearly evidences that the development would be highly visible and would change the skyline from this and likely a number of other locations.

### Extract from submitted 'Photo Montage Comparisons'



As noted by the applicant in the documents submitted and in the consultation response from EFDC, the massing of this proposal has been developed through the pre-application process. The proposed stepped nature of the building it is considered does help to reduce the mass of the development, however reservations remain from EFDC with regard to the 5 storeys on the north-west corner. It is accepted that given the civic nature of the building there is an argument that increased height could be justified. However, EFDC are concerned about the extent of the buildings visibility and as such its impact on the existing local character.

In addition to the above photo montage, the applicant also provided a number of comparisons including one from the bottom of Traps Hill looking east, reproduced below. This was a view in which concern had been raised by EFDC. The applicant in respect of this view, and the scale of the development, seeks to advance that the site can incorporate development at the height proposed without appearing incongruous. There are constraints to development on this site, in terms of the land levels and the existence of the sub-station in the north-west corner of the site, which represent restrictions or barriers to the form of development coming forward. The fifth floor of the building was added given concerns raised about previous iterations of the development, at pre-app, appearing blocky and uniform. It is accepted that this development has the potential, at the scale proposed, to form a landmark building. However, in view of the junction location, and proposed library use of the ground floor, it is considered by the applicant that this should not be a reason to refuse the application as an overdevelopment.



## Extract from submitted 'Photo Montage Comparisons'



It is considered that there is a fine balance with this application, in respect of delivering a project which is financially viable but conversely a project which does not detrimentally impact and/or adversely change the area. This is a high-density development and concerns about this as such being an overdevelopment are fully acknowledged. That said, there is a need to ensure the optimal use of land and whilst it is considered that this development would likely become a landmark building, changing the townscape, it is not considered that this necessarily a reason to refuse the application. This view is taken on the basis that the change or impacts resulting are not considered fundamentally considered detrimental or otherwise harmful. Without prejudice, should planning permission be granted, it is considered of upmost importance, given that the development would likely become a landmark, that the building materials are of high quality. And, accordingly, as such, again without prejudice, should planning permission be granted it is recommended that a condition seeking confirmation of the specification and application of all external materials be secured by way of condition.

### Landscaping

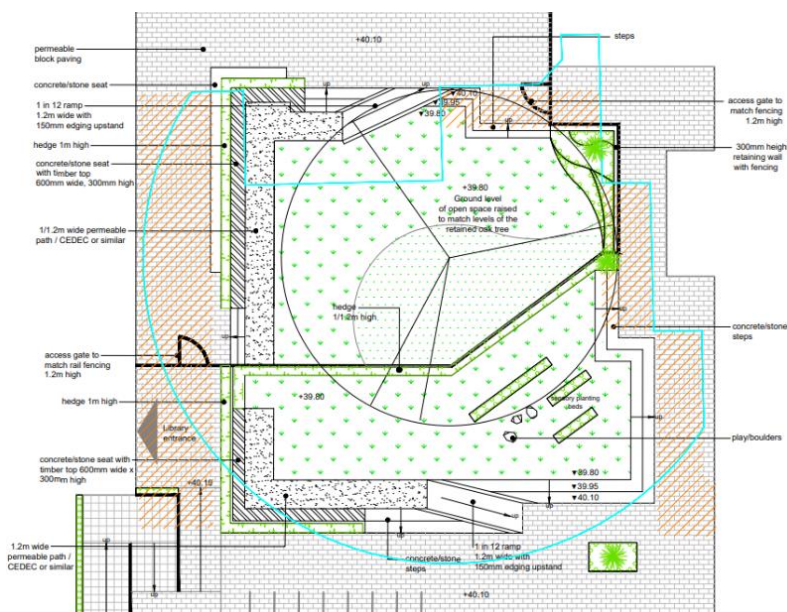
The landscaping proposals supporting this development are considered to be an integral part of the development's success. The layout of the building, and the fact that the library entrance would be located to the rear, has heightened the importance of the landscaping work not only in contributing the overall quality of the development but also in acting as wayfinding to and through the development.

Initially with regard to landscaping, the applicant has as part of the masterplan submitted sought to show, in addition to landscaping works within the red line, some improvements to the public realm adjacent to the access road (outside the red line of the application). These works do not form part of the proposals and have been shown effectively as aspirational changes. The applicant has however set aside a budget or is willing to make a financial contribution towards implementation of these works, if the landowner (EFDC) agrees. This commitment has been made on the basis that such works, particularly the relocation of the bins and public toilets, would improve not only

the public realm but in turn the appearance of the development proposed. The commitment offered by the applicant is to a value of £30,000. As this contribution is for works outside of the application area (red line), and the works identified are not necessarily needed to make the development acceptable in planning terms, it is not considered that requiring this contribution by way of way of s106/planning obligation would meet the necessary tests. This being the case, as the works would nevertheless, if undertaken, amount to positives or benefits and the contribution has been offered, confirmation of this, and any conditions attached to use of the monies, would be formally requested prior to the issue any favourable decision.

Turning back to the landscaping formally proposed to support the development, it is noted that a key driver to the landscaping scheme has been the existing Oak tree to the rear of the site. This tree is proposed to be retained as the central feature of a new courtyard which the library entrance would open out on to. The courtyard, as shown below would provide a new external seating area in formal landscaped setting. The area is proposed as a multi-use area – in that it would be useable by the library, occupiers of the residential units and the general public. This landscape setting to the library entrance is considered a significant betterment to the external area surrounding the existing building and as such in this regard compliance with policy S6 is considered to have been demonstrated. It is furthermore noted that the proposed landscaping scheme would also result in biodiversity gains to the site, in conformity with policy DM1.

#### Extract from drawing titled 'Courtyard Proposal'



#### Essex Quality Review Panel

Separately, within the representation received from Epping Forest District Council, it is noted that concern has been raised that this proposal has not been presented to the Essex Quality Review Panel. Policy DM9 of the Local Plan requires the use of Quality Review Panels for schemes of more than 50 homes or 5,000m of employment/other floorspace.

The applicant, as part of pre-application discussions with the Council, was asked to consider presenting this proposal to the Panel but declined to do so. The County Planning Authority, whilst endorsing the value and benefit the EQRP provides, do not consider that, in this instance, this is a reason which would support a refuse planning permission. Although the Council do now have adopted standards and procedures for sending proposals such as this to the Panel and are mindful of the position outlined in policy DM9, these were adopted when this proposal was already evolved through pre-application discussions with officers. As alluded, request was made for the applicant to present the proposals to the Quality Review Panel and officers would be much more comfortable with the scale of the development, had the proposal been positively assessed by the Panel. However, at the time, in view of the level of pre-app already undertaken, it was considered it would be unreasonable to formally require this.

## D EPPING FOREST SPECIAL AREA OF CONSERVATION

This site is located approximately 300m, as the crow flies, from the boundary of Epping Forest. Epping Forest is designated a Special Area of Conservation primarily for its value in respect of beech trees and wet and dry heaths and for its population of stag beetle. As an internationally important site it is afforded the highest level of protection due to its habitats and species that are vulnerable or rare within an international context. Policies DM1 and DM2 relate to habitat protection and improving biodiversity and Epping Forest SAC and the Lee Valley SPA, respectively, with policy DM22 specifically covering air quality.

Under the Conservation of Habitats and Species Regulations 2017 (as amended), the Council, as part of the decision making process for an plan or project, must as competent authority determine if the development proposed would have an adverse effect on the integrity of the designation alone or in combination with other projects.

Epping Forest District Council have identified that two main issues (known as 'Pathways of Impact') are currently adversely affecting the health of Epping Forest:

- Recreational pressure - surveys have demonstrated that most visitors live within 6.2km of the Epping Forest. As new residential development within 6.2km is likely to result in more people visiting the Epping Forest on a regular basis this will add to that recreational pressure; and
- Atmospheric pollution - which is caused primarily by vehicles travelling on roads in close proximity to the Forest emitting pollutants (Nitrogen Dioxide and Ammonia). Development proposals (regardless of their type, size and location within the district) which would result in even an increase in just one additional vehicle has the potential to contribute to increases in atmospheric pollution within the Epping Forest.

As outlined within policy DM2 planning applications need to be supported by sufficient information to determine whether a proposal would result in an adverse effect on the integrity of Epping Forest SAC. To assist with this, Epping Forest District Council have produced a number of strategies including: the Epping Forest Air Pollution Mitigation Strategy; the Epping Forest Strategic Access Management and Monitoring Strategy; and Epping Forest District Green Infrastructure Strategy.

Policy DM2 of the Local Plan details that the Council will expect all relevant development proposals to ensure that there is no adverse effect on the site integrity of

the Epping Forest Special Area of Conservation. New development for which it is not possible to conclude no adverse effect on the integrity of the Epping Forest Special Area for Conservation, either alone or in combination with other plans or projects, will not be permitted. Where development would have likely significant effects, mitigation measures, on-site and off-site as appropriate, will be required to ensure that it will have no adverse effect on the integrity of these areas. In designing mitigation measures, regard should be had to the Air Pollution Mitigation Strategy for the Epping Forest, the District's Green Infrastructure Strategy and Epping Forest Strategic Access Management and Monitoring Strategy. Contributions towards off-site measures to mitigate the likely impacts air pollution and adverse recreational effects arising from a development will be sought where these are necessary to make the development acceptable, are directly related to the development and are fairly and reasonably related in scale to the development.

In recognition of the risks posed to the Epping Forest Special Area of Conservation from urbanisation effects over and above that resulting from recreational pressures (including from fly-tipping, the introduction of non-native plant species and incidental arson) planning applications for development will not be permitted within 400 metres of the boundary of the Epping Forest Special Area of Conservation unless it can be demonstrated through project level HRA that the development would not generate any such impacts.

As an allocated site within the Local Plan, this allocation was included in the HRA/AA which was undertaken to support adoption of the Plan. Whilst this sought to confirm, subject to mitigation that there would not be any adverse impacts on the Forest or designation as a result of the allocations within the Plan – it must be noted that this applications proposes development over and above that allocated to that point that an assessment of additional impact is needed in terms of confirming acceptability and level of mitigation required.

The applicant accordingly submitted a Shadow Appropriate Assessment in support of this application. This assessment, in respect of the above, sought to quantify additional vehicle movements likely from the uplift in units, in comparison to the allocation in the Plan, and propose mitigation measures to offset identified impacts. Mitigation measures proposed include a financial contribution as per the Air Pollution Mitigation Strategy, Epping Forest Strategic Access Management and Monitoring Strategy and Green Infrastructure Strategy; that 17 of the car parking spaces proposed would be ULEV parking only; 50% (or a minimum of 10) of the other car parking spaces would have EV charging provision; cycle parking facilities would be provided; a sustainable travel welcome pack would be provided to occupiers; and a staff travel plan produced.

The Council's Habitat Regulations Assessment/Appropriate Assessment of this application can be found near the end of this report. The conclusion of this, is that having considered the proposal and consulted Epping Forest District Council on the proposed mitigation measures in the shadow HRA/Appropriate Assessment, Essex County Council is satisfied that the development can avoid an adverse effect on the integrity of Epping Forest Special Area of Conservation (SAC), either alone or in combination with other plans and projects.

The mitigation measures, including financial contributions, are considered sufficient to mitigate for predicted impacts on Epping Forest SAC from atmospheric pollution and increased recreation from the development.

As the competent authority, Essex County Council, in view of the conservation objectives for Epping Forest SAC, and having consulted Natural England and fully considered any representation received (where necessary), agree to the project under regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended).

## E HERITAGE

A Heritage Statement has been submitted in support of this application. This seeks to suggest that the proposal has the capacity to cause change to the setting of 2 Traps Hill (a Grade II listed building). However, the assessment seeks to suggest that there would be no other impacts to heritage assets. In terms of impact to 2 Traps Hill, the Statement submitted advances that there would be a minor but noticeable change in wider setting. It is nevertheless suggested that the change would not adversely affect the way in which the listed building is read, appreciated or understood and as such its significant would be preserved.

The Council's historic building consultant agrees with the conclusions drawn in respect of 2 Traps Hill. However, considers that the proposals would impact upon the setting of York Hill Conservation Area, to the north-west of the application site. The Council's consultant notes that York Hill Conservation Area is characterised by its layout, the presence of seventeenth and nineteenth century architecture and its relationship with the surrounding Epping Forest, which bounds the Conservation Area on its western edge. Topographically, the Conservation Area occupies a prominent position along the ridges of York Hill, Woodbury Hill, Kings Hill and Pump Hill.

In context of the scale of development, it is considered by the Council's consultant that harm to the conservation area designation is likely, albeit it acknowledged that this would be at the low end of less than substantial harm, as per paragraph 202 of the NPPF. In this circumstance, the NPPF advocates that harms should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

Following these reservations being raised, the applicant did submit an additional study seeking to evaluate the impact of the development from the Conservation Area. This did agree that there may be a minor but noticeable change to the setting of the Conservation Area. However, it was maintained by the applicant's consultant that this did not amount to harm, as per the relevant paragraphs in the NPPF. And, some photo montages (replicated below) were provided for a view from King's Green looking south-east, across the cricket pitch, towards the site (as existing and with the development in situ – winter and summer) to support this.



## Extract from submitted 'Photo Montage Comparisons'



Following review of this, and the applicant suggesting that the material palette of the proposal could be amended – such that darker materials are used on the top floor, the Council's consultant whilst not agreeing that there would be no harm to the conservation area, did accept that the harm resulting would be at the lowest end of less than substantial.

In this context, it is considered as per paragraph 202 of the NPPF that a judgement needs to be made as to if the public benefits associated with this scheme outweigh this harm. A decision with regard to this accordingly will be formed as part of the conclusion of this appraisal overall.

### *Status of the Existing Building*

It is noted that comments have been received from the Local Member and the public with regard to the architectural quality of the existing building. It is understood, from the comments received, that the building was designed by J Elidir Davis. Whilst it is not denied that the building exhibits some qualities, it is confirmed that the building is not listed and does not form part of any local list. In respect of assessment, it is not therefore considered that the building as existing should be considered a non-designed heritage asset and assessed in accordance with paragraph 203 of the NPPF.

## F HIGHWAYS

This application has been submitted with a Transport Statement. This has sought to assess the impact of the development in respect of highway efficiency and safety and furthermore the suitability of access from Traps Hill to the proposed basement car parking area.

Initially in terms of the vehicular access from Traps Hill – as existing, there is an access to the site. As part of the proposals the existing brick walls would need to be removed in order to improve visibility with the new access point proposed slightly to



the west. This, as noted by the Highway Authority, would result in the access being in the middle of a 'limited 2hr waiting' parking bay – which provides spaces for three vehicles. To implement the proposed access the applicant would have to apply to remove this bay and implement new double yellow lines etc. to match the existing and, also, amend the relevant Traffic Regulation Order.

The applicant is proposing to re-provide the parking space which would be lost within this bay to the east of the new access proposed such that the existing three parking spaces would be maintained (just within bays either side of the access to the site). This is shown in plan form below. This has been agreed in principle by the North Essex Parking Partnership as an acceptable solution and accordingly the Highway Authority has raised no objection to the proposed access to the parking basement.

#### Extract from drawing titled 'Proposed TRO Strategy'



From a safety and efficiency perspective, the Transport Statement submitted seeks to suggest that the proposed new library and other non-residential uses would have similar traffic attraction characteristics to the existing situation. It is however accepted that vehicle movements associated with the proposed residential use would be additional. In this regard likely levels of traffic generated from the residential use are suggested as:

#### Table 5.2 from submitted Transport Statement

**Table 5.2: Likely Level of Traffic Generated by the Proposed Development**

Use	No of Dwellings	AM Peak Hour		PM Peak Hour		12 Hour Period	
		Arrivals	Departures	Arrivals	Departures	Arrivals	Departures
Flats	38	2	8	7	4	52	54
Total Two-Way		10		11		106	

The applicant has suggested that the level of vehicle movements does not warrant any off-site highway improvement, with it not considered that the development would significantly impact on highway safety or efficiency. The Highway Authority has raised no objection to the development coming forward and/or sought to raise any reservations with regard to the conclusions put forward by the applicant.

## Parking Provision

This application proposes a total of 37 car parking space, in a basement level, which would solely be used by the residential development. No parking provision is proposed for library staff, deliveries or visitors, with it suggested that these demands could be catered for in the adjacent public pay and display car park.

In terms of parking provision, Essex County Council's parking standards advocate a minimum standard of 1 vehicle parking space per dwelling for 1 bedroom units and 2 spaces for any 2+ bedroom units. In addition to this 1 secured covered cycle space per dwelling should be provided. With regard to the library use a maximum standard of 1 vehicle space per every 10m<sup>2</sup> of floorspace and 1 space cycle space per 4 staff plus visitor parking (individual merits) is outlined.

The parking provision proposed for the residential accommodation accordingly represents an under provision in terms of the adopted Standards. That said, as noted within policy LOU.R7 this site is in a highly sustainable location with good transport accessibility. Measures accordingly should be secured as part of the development to promote sustainable transport, with suggestion made of limiting on-site residents parking to that required to service essential needs.

As detailed within the consultation response received from Epping Forest District Council, it is not suggested that this be a car-free development but the reservations are raised as to if the proposed provision still represents an over-provision, irrespective to that suggested in the Parking Standards. A number of comments with regard to parking have also been received from the public, some seeking to suggest the proposed parking provision is too high but the majority suggesting that the provision is too low. Overall, whilst there is reservation that no car parking space for deliveries to the library forms part of the proposals, it is accepted that this is more of an operational issue and that potential solutions do exist (given the adjacent public pay and display car park).

It is considered that the applicant could have sought to propose a Parking Standard equivalent provision of parking to support the uses proposed but hasn't in view of the sustainable location of the site. In this regard, mindful that the Highway Authority has raised no objection from a parking provision perspective, no objections are as such raised. Without prejudice, should planning permission be granted a condition would nevertheless be attached as requested by the Highway Authority, requiring the provision, implementation and distribution of a Residential Travel Information Pack for sustainable transport, which is to include six one day travel vouchers for use with the relevant local public transport operator.

## **G SUSTAINABILITY, FLOOD RISK/DRAINAGE AND BASEMENT IMPACT ASSESSMENT**

### Sustainability

The applicant has sought to suggest that the proposals would adopt an ambitious fabric first approach to achieve significant reductions in primary energy demand, together with reliance on on-site low carbon technologies to strive to meet the current requirements geared towards zero carbon. The proposed energy strategy aims to

minimise energy consumption through the performance of the building envelope, façades and plant and as such demonstrate compliance with policy DM20 of the Local Plan which relates to low carbon and renewable energy.

In respect of this, windows have been positioned to take advantage of solar orientation, with principal living spaces arranged internally so they do not only have north facing windows, if possible. Opportunities for natural shading have also been considered, with the positioning of existing and proposed trees informing design decisions relating to the proposals.

In terms of ventilation, all flats are proposed to be ventilated by means of a single Mechanical Ventilation Heat Recovery (MVHR) unit, to be located within a storage cupboard in each flat. The MVHR unit would achieve efficiencies in performance by extracting the heat from purged air to warm incoming air in the winter months. The unit can be switched off during the warmer summer months, to avoid loss of efficiency when for example windows are opened. The proposed basement car park would be ventilated by way of single air handling unit.

Turning to heating, an Air Source Heat Pump (ASHP) system is proposed where external condenser units, proposed on the roof, would harvest heat from the air, using a refrigeration cycle to transfer the heat into the building via a low temperature hot water (LTHW) system. The system would circulate heating water to each apartment via a communal heat network, with each apartment being provided with a Heat Interface Unit (HIU) located in a storage cupboard. The toilet, changing and ancillary spaces on the ground floor are proposed to be heated via radiators served from the centralised ASHP system. The other large areas, public spaces and meeting rooms on the ground floor will have heating and cooling provided by ceiling mounted Variable Refrigerant Flow cassette units.

Solar panels are proposed across some of the flat roof projections, where orientation renders this viable. The estimated size of the solar array to be fitted is 130 panels which translates to 45 kWp system, assuming each panel's power output is 0.35kWp. This would generate approximately 35MWh of electricity per year and offer savings of approximately 8 tonnes of CO<sub>2</sub> per year.

The applicant has also confirmed that all dwellings would achieve the potable water use target of less than 105 litres per person per day through installation of water efficient fittings, to comply with policy DM19 of the Local Plan.

### *Demolition/Construction Programme*

It will be noted that the embodied carbon in the existing building has been raised within some of the public letters of representation received. This is acknowledged and is considered to be a counter to some of the sustainability claims of the new building. However, the applicant has sought to suggest sustainable construction practices will be followed where possible, with preference given to the use sustainable materials and measures to minimise construction waste going to landfill. Without prejudice, should planning permission be granted, a condition could be imposed requiring submission of a Construction Environmental Management Plan (CEMP) to confirm measures proposed to ensure compliance with that suggested and accordingly the applicable part of policy DM21.

### Flood Risk/Drainage

This site is located within Flood Zone 1, at a low probability of fluvial and/or tidal flooding. No in-principle flood risk objections are therefore raised to this development coming forward.

With regard to drainage, surface water is proposed to be managed via an existing outfall (Thames Water sewer to the north of the site – opposite side of Traps Hill). However, to meet current standards it is proposed that the discharge rate of surface water be restricted to 5l/s which would represent an 86% reduction in surface water flows off site and attenuate excess flows below ground up to a 1 in 100-year event plus 40% climate change. This restricted flow is proposed to be delivered by way of pump and 30m<sup>2</sup> of underground attenuation crates.

In terms of foul water, similarly this is proposed to be managed via an existing outfall (Thames Water sewer to the north of the site – same side of Traps Hill as the development site). Flows are proposed to be restricted to 4l/s with capacity proposed to contain 24 hours of foul water flow in event of pump failure. This capacity would be provided by way of underground storage tank. The Lead Local Flood Authority has raised no objection to the proposed drainage design subject to a detailed surface water drainage scheme, based on the above, being secured by way of planning condition. On this basis, it is considered compliance with policies DM15, DM16 and DM18 can be demonstrated.

### Basement Impact Assessment

A Ground Investigation Report and specific Basement Impact Assessment have been submitted in support this application. The Ground Investigation Report seeks to confirm the existing ground conditions and contamination status of the site. The Report suggests that some contamination was encountered in testing of some shallow made ground to the west of the site. However, in context that this area is in the new building footprint, this material would likely be removed as part of the re-development process. That said, even if it was not removed, the new building would prevent users from coming into contact with it such that the Report does consider this to pose a risk and further remediation is not necessary. In respect of gases, the Report suggests that the site is safe for the intended mixed end use. However, gas monitoring on-going is recommended to continue with the adoption of gas mitigation measures, if required.

Specifically with regard to the basement level, on the basis of the relevant findings of the Ground Investigation Report, the Basement Impact Assessment concludes that ground movements associated with the construction of the basement level could be limited to acceptable values through a combination of the stiffness of the proposed retaining structure, suitably designed temporary works and good levels of workmanship. No objections to the basement level are therefore considered to exist in context of policy DM12 of the Local Plan.

## H FINANCIAL VIABILITY AND CONTRIBUTIONS

### Affordable Housing

Policy H2 of the Local Plan states that on development sites which provide for 11 or more 1 or more homes, or residential floorspace of more than 1,000 square metres (combined gross internal area), the Council will require 40% of those homes to be affordable and provided on-site. Expanding the policy details that proposals that do not accord with this requirements must be accompanied by a viability assessment (with supporting evidence), which is transparent and complies with relevant national or local planning policy and guidance applicable at the time.

As confirmed previously in this report, this application proposes no affordable housing and a viability assessment has been submitted to support this. The viability assessment suggests that this is project would result in a deficit or loss of approximately £5.1 million. This figure includes a developers profit margin of £3.3 million. However, even if this was removed, it is noted that the development would still be in deficit.

The assessment submitted acknowledges the above but seeks to suggest that the applicant recognises the need to achieve value for money with this public asset and is striving to achieve a break-even position. In this regard, a number development assumptions which are personal to their circumstances have not been factored into the market viability assessment which, it is accepted, have the potential to reduce costs to this level.

That said, in view that the level of profit assumed in the appraisal is exceeded by deficit, and the introduction of affordable housing would further heighten this, it is concluded as part of the assessment submitted that affordable housing is not viable in this instance.

It will be noted that the Epping Forest District Council have questioned the conclusions of the submitted assessment – noting the profit margins incorporated within the assessment. Initially with regard to this query, it is confirmed that the assessment submitted seeks to suggest that the development would still result in a deficit even if the included profit margins were removed. However, in the interests of seeking to ensure transparency in the decision making process and in an attempt to confirm the findings of the assessment submitted, the Council instructed independent consultants to review the viability assessment submitted. This independent review largely ratified the conclusions suggested by the applicant, albeit the project deficit was suggested by the Council's consultants as £4.9 million rather than £5.1 million.

Without prejudice, in the event that planning permission is granted, a review of the development viability, for example at the end of the construction programme or after the sale of a certain number of a units, could nevertheless be secured to confirm the re-evaluate the development financials. In due course, should it be evidenced as part of this, for whatever reason, the development was (net) profitable, a financial contribution towards affordable housing provision within the area could then be secured.

## Financial Contributions

Planning obligations are legal obligations entered into to mitigate the impact of a development proposal. These can be secured via a planning agreement entered into under section 106 of the Town and Country Planning Act 1990 (as amended) by a person with an interest in the land and the local planning authority; or via a unilateral undertaking entered into by a person with an interest in the land without the local planning authority. The tests to requiring a planning obligation are set out in Regulation 122 of the Community Infrastructure Levy Regulations 2010 (as amended) and NPPF. These are, that the obligation must be:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.

As detailed within this report, contributions towards access management and monitoring recreation/visitor pressure on Epping Forest SAC and managing and mitigating the effects of air pollution from the development on Epping Forest SAC are proposed. These requested obligations are considered to meet the tests, and necessary to demonstrate compliance with relevant legislation and policies.

With regard to infrastructure, no education contribution has been sought from the Essex County Council, as Education Authority. In addition, no contribution towards the library service, provided by Essex County Council, is considered appropriate given this proposal would be providing a replacement library. A contribution has been sought from the NHS – Hertfordshire and West Essex Integrated Care Board. This contribution has been sought given the development would have an impact on primary/secondary healthcare provision in the area, and its implications, if unmitigated, would be unsustainable for the NHS. The financial contribution for health infrastructure sought has been calculated using a formula based on the number of units proposed and does not take into account any existing deficiencies, shortfalls or other development proposals in the area. This requested obligation is considered to meet the tests, and necessary to demonstrate compliance with policy D2.

The consultation response received from Epping Forest District sought to suggest financial contributions should be secured pursuant to additional provision of public parks and gardens and additional provision for children and young people. It is suggested that contributions towards the aforementioned is to comply with policy D1 of the Local Plan. Policy D1 states that new development must be served and supported by appropriate on and off-site infrastructure and services as identified through the Infrastructure Delivery Plan Schedules. Whilst the above are identified to in the Infrastructure Delivery Plan Schedules, in this case, it is not considered that such contributions would be necessary to make the development acceptable in planning terms and/or that any such contributions would directly relate to the development being approved. Finally, noting that the viability assessment submitted with this application has sought to confirm that this development would not be a profit making, seeking such contributions would also not likely be fair and reasonable. For this reason, the contributions sought in respect of additional provision of public parks and gardens; and additional provision for children and young people are not considered to meet the tests in this case.



## 7. CONCLUSION

Whilst this proposal seeks to re-develop the site to a greater scale than existing and introduce new land uses (residential), it is clear from the Essex Future Library Services Strategy 2019-2024 that Essex County Council (as applicant) is principally looking to make the most efficient use of Council buildings and land to ensure the viability of services, such as libraries, going forward.

This site is allocated within the Epping Forest Local Plan for re-development and whilst it is accepted that this development proposes a far denser development to the allocation, the Government has a strategic objective to significantly boost the supply of homes and promotes a significant uplift in the average density of residential development in city and town centre locations, such as this, which are well served by public transport, unless it can be shown that there are strong reasons why this would be inappropriate.

No in-principle objections are considered to exist to the re-development of the site and/or the introduction of residential use per-se.

It is considered that the proposals would result in a change to the character of the site, given the increased height of the new building. However, it is considered that the design rationale has acknowledged this and sought to reduce the perceived mass of the building with a stepped form and the application of external materials, fenestration and landscaping to positively contribute to the streetscene and locality.

It is not considered that the development would give rise to any amenity impacts at a level to warrant refusal; and it is considered the development would afford an acceptable standard of living to all occupiers of the proposed flats. In addition, it is not considered that the development would result in unacceptable impacts to highway safety and efficiency subject to the imposition of appropriate conditions.

Impacts, from the development, have been identified to Epping Forest Special Area of Conservation. However, mitigation pursuant to these impacts could be secured either as part of the development specification or as financial contributions towards the management and monitoring of these issues at a more strategic level.

Harm has been identified to the York Hill Conservation Area. However, this harm has been suggested at the lowest end of less than substantial. In context of the public benefits which would be realised from this development, in the form of the delivery of a new modern library, it is considered that this harm is accordingly outweighed in the planning balance.

It is accepted that the public benefit of a new library does not principally stem from the actual design of this development and that this benefit would likely be delivered as part of any re-development of the site, given the policy requirements of the site allocation. That said, overall, an appraisal of the proposals has failed to identify any fundamental reasons to suggest that the development is not sustainable and/or not well designed.

## 8. RECOMMENDED

That, pursuant to Regulation 3 of the Town and Country Planning General Regulations 1992, planning permission be granted subject to the following requirements and conditions:

1. Within 6 months (or extended period as agreed with the Chairman of Development and Regulation Committee), the applicant shall enter into a legal agreement pursuant to section 106 of the Town and Country Planning Act 1990 (as amended) and provide evidence of actual payment of the below contributions together with any monitoring contribution as may be required, before commencement of the development:
  - £70,399.94 towards access management and monitoring recreation/visitor pressure on Epping Forest SAC;
  - £27,208 towards the implementation of the Roding Valley Recreation Ground/Public Rights of Way infrastructure enhancement project – a recreational mitigation/avoidance measure being secured separate to the costs arising from Epping Forest Strategic Access Management and Monitoring Strategy;
  - £12,730 towards managing and mitigating the effects of air pollution from the development on Epping Forest SAC; and
  - £59,093 towards additional primary healthcare services.
2. Within 6 months (or extended period as agreed with the Chairman of Development and Regulation Committee), the applicant shall provide a commitment to the County Planning Authority that a minimum of £30,000 of funding is available for public realm improvements, in the immediate locality of the development site, to be undertaken in association with the development approved. The commitment shall confirm the intention to hold proactive discussions with Epping Forest District Council and other relevant parties with regard to implementing such improvements and that this funding/money could be called upon within 5 years of the commencement date of the development.

### Conditions

1. The development hereby permitted shall be begun before the expiry of 3 years from the date of this permission.

Reason: To comply with section 91 of the Town and Country Planning Act 1990 (as amended).

2. The development hereby permitted shall be carried out in accordance with the details of the application dated 09/09/2022 and shown on drawings titled: 'Site and Location Plan', drawing number: 0501 (Revision A), dated 25/04/2022; 'Proposed Ground Floor Plan – Library Level', drawing number: 0010 (Revision C), dated 20/06/2022; 'Proposed First Floor and Second Floor Plans', drawing number: 0011 (Revision C), dated 12/08/2023; 'Proposed Third and Fourth Floor Plans', drawing number: 0012 (Revision C), dated 12/08/2023; 'Proposed Roof Plan', drawing number: 0013 (Revision C), dated 12/08/2023; 'Proposed Basement Plan', drawing number: 0001 (Revision A), dated 19/04/2022; 'Proposed North Elevation', drawing number: 201 (Revision C), dated 12/08/2023; 'Proposed West Elevation', drawing number: 202 (Revision C), dated 12/08/2023; 'Proposed South Elevation', drawing number: 203 (Revision

D), dated 12/08/2023; 'Proposed East Elevation', drawing number: 204 (Revision D), dated 12/08/2023; 'Proposed Internal Courtyard Facing Elevations', drawing number: 205 (Revision C), dated 12/08/2023; 'Proposed Section A-A', drawing number: 0101 (Revision D), dated 12/08/2023; 'Proposed Section B-B', drawing number: 0102 (Revision D), dated 12/08/2023; 'Proposed Internal Courtyard Section', drawing number: 0103 (Revision C), dated 12/08/2023; '1B2P Flat Types', drawing number 020 (Revision A), dated 19/04/2022; '2B3P Flat Types Sheet 1', drawing number 021 (Revision B), dated 12/08/2023; '2B3P Flat Types Sheet 2', drawing number 022 (Revision B), dated 12/08/2023; '2B4P Flat Types Sheet 1', drawing number 023 (Revision A), dated 19/04/2022; '2B4P Flat Types Sheet 2', drawing number 024 (Revision B), dated 12/08/2023; '2B4P Flat Types Sheet 3', drawing number 025 (Revision B), dated 12/08/2023; and in accordance with any non-material amendment(s) as may be subsequently approved in writing by the County Planning Authority, except as varied by the following conditions.

Reason: For the avoidance of doubt as to the nature of the development hereby permitted, to ensure development is carried out in accordance with the approved application details, to ensure that the development is carried out with the minimum harm to the local environment and in accordance with policies SP1, SP2, SP6, H1, H2, T1, DM1, DM2, DM3, DM7, DM9, DM10, DM11, DM12, DM15, DM16, DM18, DM19, DM20, DM21, DM22, P2, D1, D2, D3, D4 and LOU.R7 of the Epping Forest District Local Plan 2011-2033.

3. No development above damp proof membrane of the building hereby approved shall take place until exact details of the materials to be used for the external appearance (including all windows, doors, balconies, roof coverings and rain goods) of the development hereby permitted have been submitted to and approved in writing by the County Planning Authority. The development shall be implemented in accordance with the approved details.

Reason: In the interest of visual amenity, to ensure the proposed material palette is of a high quality and to comply with policies SP2, DM9 and P2 of the Epping Forest District Local Plan 2011-2033.

4. No works or development shall take place until a scheme for the protection of trees to be retained has been submitted to and approved in writing by the County Planning Authority. The scheme shall include:
  - a) A plan that shows the position, crown spread and root protection area in accordance with paragraph 5.2.2 of BS:5837 of every retained tree on site and on neighbouring or nearby ground to the site in relation to the approved plans and particulars. The positions of all trees to be removed shall be indicated on the plan.
  - b) Details of each retained tree in a separate schedule in accordance with paragraph 4.2.6 of BS:5837
  - c) A schedule of tree works for all the retained trees specifying pruning and other remedial or preventative work. All tree works shall be carried out in accordance with BS:3998, 1989, 'Recommendations for Tree Work'.
  - d) Details and positions of the Ground Protection Zones in accordance with section 9.3 of BS:5837.
  - e) Details and positions of Tree Protection Barriers identified separately

where required for different phases of construction work (e.g. demolition, construction, hard landscaping) in accordance with section 9.2 of BS:5837. The Tree Protection Barriers shall be erected prior to each construction phase commencing and remain in place, and undamaged for the duration of that phase. No works shall take place on the next phase until the Tree Protection Barriers are repositioned for that phase.

- f) Details and positions of the Construction Exclusion Zones in accordance with section 9 of BS:5837.
- g) Details and positions of the underground service runs in accordance with section 1 1.7 of BS:5837.
- h) Details of any changes in levels or the position of any proposed excavations within 5 metres of the Root Protection Area of any retained tree, including those on neighbouring or nearby ground in accordance with paragraph 5.2.2 of BS:5837.
- i) Details of any special engineering required to accommodate the protection of retained trees (e.g. in connection with foundations, bridging, water features, surfacing) in accordance with section 10 of BS:5837.
- j) Details of the working methods to be employed with the demolition of buildings, structures and surfacing within or adjacent to the root protection areas of retained trees.
- k) Details of the working methods to be employed for the installation of drives and paths within the RPAs of retained trees in accordance with the principles of “No-Dig” construction.
- l) Details of the working methods to be employed for the access and use of heavy, large, difficult to manoeuvre plant (including cranes and their loads, dredging machinery, concrete pumps, piling rigs, etc) on site.
- m) Details of the working methods to be employed for site logistics and storage, including an allowance for slopes, water courses and enclosures, with particular regard to ground compaction and phytotoxicity.
- n) Details of the method to be employed for the stationing, use and removal of site cabins within any root protection areas in accordance with paragraph 9.2.3 of BS:5837.
- o) Details of tree protection measures for the hard landscaping phase in accordance with sections 13 and 14 of BS:5837.
- p) The timing of the various phases of the works or development in the context of the tree protection measures.

The approved tree protection scheme shall be implemented and maintained during the complete construction phase of the development.

Reason: To ensure retained trees are protected from damage, in the interest of visual amenity and to comply with policies SP6, DM1, DM3, DM9 and P2 of the Epping Forest District Local Plan 2011-2033.

5. Prior to commencement of any landscaping works, or in any event prior to beneficial occupation of the development hereby permitted, a finalised hard and soft landscaping scheme (inclusive of boundary treatments, fencing and gates and landscape features such as benches) shall be submitted to the County Planning Authority for review and approval in writing. For the avoidance of doubt, it is expected that this scheme will follow the landscaping principles detailed on drawings titled ‘Proposed Site Layout’, drawing number:

F1628PS100 (Rev B), dated 14/12/2022 and 'Courtyard Proposal', drawing number: F1628PS300 (Rev B), dated 14/12/2022. However, the scheme submitted shall confirm the exact tree species proposed to be planted and the sizing of all plants and shrubs upon planting. The approved landscaping scheme shall subsequently be implemented within the first available planting season (October to March inclusive) and maintained thereafter in accordance with the details subsequently submitted and approved pursuant to condition 6 of this permission.

Reason: To comply with section 197 of the Town and Country Planning Act 1990 (as amended), in the interest of the environment and the amenity of the local area and to comply with policies SP6, DM1, DM3, DM9 and P2 of the Epping Forest District Local Plan 2011-2033.

6. Prior to commencement of any landscaping works, or in any event prior to beneficial occupation of the development hereby permitted, a Biodiversity Enhancement and Landscape Management Scheme shall be submitted to and approved in writing by the County Planning Authority. The Scheme shall detail any and all biodiversity enhancement measures proposed to be incorporated as part of the development and landscaping proposals and, for the avoidance of doubt, in terms of management seek to confirm that any tree or shrub forming part of a landscaping scheme approved in connection with the development that dies, is damaged, diseased or removed within the duration of 5 years after the completion of the development (operations) shall be replaced during the next available planting season (October to March inclusive) with a tree or shrub to be agreed in advance in writing by the County Planning Authority.

Reason: To conserve and enhance Protected and Priority species, to allow the County Planning Authority to discharge its duties under the UK Habitats Regulations, the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority Habitats and Species), to ensure the landscaping proposals are effectively managed following implementation and to comply with policies SP6, DM1, DM3, DM9 and P2 of the Epping Forest District Local Plan 2011-2033.

7. Prior to beneficial occupation of any part of the building hereby permitted, an access management scheme for the external courtyard (open space) shall be submitted to the County Planning Authority for review and approval and writing. This area shall subsequently be managed in accordance with the approved scheme.

Reason: The external courtyard has been suggested as a multi-use area. The management scheme to be submitted pursuant to this condition is required noting that there are indications of some fencing/gates around this area. Clarity about the use of this space, including any access restrictions and management for example as a bookable space is considered necessary to ensure the suggested benefits are fully delivered for all potential users with reference to policies SP2, DM10, P2 and D4 of the Epping Forest District Local Plan 2011-2033. of the Epping Forest District Local Plan 2011-2033.

8. No development above damp proof membrane of the building hereby approved shall take place until exact details and specification of all plant and apparatus proposed to be installed on the roof of any part of the building hereby permitted has been submitted to the County Planning Authority and approved in writing. Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 2015 (or any order revoking and re-enacting that Order with or without modification) no additional aerials, antennas, satellite dishes or electronic communications apparatus to that potentially shown on the aforementioned shall be installed or erected on any part of the building without the benefit of express planning permission.

Reason: In the interest of amenity, to ensure the design rationale for the building is not subsequently compromised by urban paraphernalia and to comply with policies DM9, DM10, DM21 and P2 of the Epping Forest District Local Plan 2011-2033.

9. No external fixed lighting shall be erected or installed on-site until exact details of the location, height, design, luminance, operation and management have been submitted to and approved in writing by the County Planning Authority. With regard to this, the details to be submitted shall include an overview of the lighting design and management (including proposed hours of operation), the maintenance factor and lighting standard applied together with a justification as why these are considered appropriate, detailed drawings showing the lux levels on the ground (including spill in context of adjacent site levels), angles of tilt, colour, temperature, dimming capability and the average lux (minimum and uniformity) for all external lighting proposed. The details shall ensure the lighting is designed to minimise the potential nuisance of light spillage on adjoining areas, properties and highways.

The lighting design shall also consider the impact on light sensitive biodiversity and a) identify those areas/features on site that are particularly sensitive for bats and that are likely to cause disturbance in or around their breeding sites and resting places or along important routes used to access key areas of their territory, for example, for foraging; and b) clearly demonstrate that areas to be lit will not disturb or prevent the above species using their territory or having access to their breeding sites and resting places.

The lighting shall thereafter be erected, installed and operated in accordance with the approved details.

Reason: To minimise the nuisance and disturbances to occupiers of the development, neighbours (and the surrounding area), in the interests of highway safety, to minimise impact on light sensitive biodiversity and to comply with policies DM1, DM9, DM10, DM21 and P2 of the Epping Forest District Local Plan 2011-2033.

10. No development above damp proof membrane of the building hereby approved shall take place until exact details of the sustainability/low carbon/energy saving measures outlined in the submitted 'Energy and Sustainability Strategy for the Loughton Library', document reference: AG/VL/P20-2058/01TN Rev A, dated 10 August 2022 have been submitted to the County Planning Authority for

review and approval in writing. Such detail shall, for the avoidance of doubt, include but not be limited to the specification of building materials, windows and doors; building insulation; the proposed mechanical ventilation with heat recovery system; the air source heat pump system; proposed water efficient fittings within the residential units to achieve the targeted water consumption level of less than 105 litres per person per day; the location of the 10 electric vehicle charging points to be provided within the car park and confirmation that these will be installed and be operational prior to beneficial occupation of any residential unit; and the exact layout of the solar arrays proposed on the building roof, as shown in principle on drawing titled 'Proposed Roof Plan', drawing number: 0013 (Revision C), dated 12/08/2023. The development shall subsequently be implemented in accordance with the approved details.

Reason: In the interests of energy efficiency, delivering the carbon savings suggested as part of the proposals, supporting the use of electric vehicles and to comply with policies T1, DM2, DM19, DM20, DM22 and P2 of the Epping Forest District Local Plan 2011-2033.

11. Prior to beneficial occupation of the development hereby permitted, the site access arrangements and vehicle parking and turning areas, as shown on drawings titled 'Proposed Basement Plan', drawing number: 0001 (Revision A), dated 19/04/2022 and 'Proposed Ground Floor Plan – Library Level', drawing number: 0010 (Revision C), dated 20/06/2022, shall be provided, hard surfaced, sealed and marked out. In addition to this, the enclosed bike store and external cycle hoops, as shown on the drawing titled 'Proposed Ground Floor Plan – Library Level', drawing number: 0010 (Revision C), dated 20/06/2022, shall be constructed and provided. The vehicle parking and turning area areas, bike store and cycle hoops shall be permanently retained for the lifetime of the development and shall not be used for any other purpose.

Reason: To provide a suitable level of parking on-site, to provide appropriate facilities to store cycles, in the interest of highway safety and to comply with policies S2, T1, DM2, DM9, DM22 and P2 of the Epping Forest District Local Plan 2011-2033.

12. Prior to beneficial occupation of the any of the residential units hereby approved, a management scheme for the vehicle parking area, as shown on drawing titled 'Proposed Basement Plan', drawing number: 0001 (Revision A), shall be submitted to the County Planning Authority for review and approval in writing. The management plan shall seek to confirm allocation of the parking provision across the residential units and furthermore outline how it will be ensured that 17 of the vehicle spaces being provided will be restricted to use by only Ultra Low Emission Zone vehicles.

Reason: To ensure appropriate allocation of the parking provision proposed, to limit the potential for atmospheric pollution from the vehicle movements associated with the development and to comply with policies S2, T1, DM2, DM9, DM22 and P2 of the Epping Forest District Local Plan 2011-2033.



13. Prior to beneficial occupation of the any of the residential units hereby approved, the developer shall be responsible for the provision, implementation and distribution of a Residential Travel Information Pack for sustainable transport. The pack which shall be provided to each dwelling, free of charge, shall include at least six one day travel vouchers for use with the relevant local public transport operator.

Reason: In the interests of reducing the need to travel by car, promoting sustainable development and transport and to comply with policies T1, DM2, DM22 and P2 of the Epping Forest District Local Plan 2011-2033.

14. Prior to the library use hereby approved being opened to the public, a staff and library user (customer) travel plan/information pack shall be submitted to the County Planning Authority for review and approval in writing. This document, which is expected to be promoted to staff and made publicly available, shall seek to outline active travel facilities and public transport services within the locality in an attempt to reduce the number of staff and customers visiting the site by way of private vehicle. The plan should outline how often the document will be reviewed, how travel patterns of staff and customers could potentially be monitored and any annual commitments to initiatives to support sustainable travel.

Reason: In the interests of reducing the need to travel by car, promoting sustainable development and transport and to comply with policies T1, DM2, DM22 and P2 of the Epping Forest District Local Plan 2011-2033.

15. No development shall take place until a Construction Management Plan has been submitted to and approved in writing by the County Planning Authority. The approved Plan shall be adhered to throughout the construction period and provide for:
- a) the proposed construction access;
  - b) the layout of the construction compound (inclusive of areas proposed for the parking of vehicles of site operatives and visitors, the loading and unloading of plant and materials and the storage of plant and machinery used in constructing the development);
  - c) wheel and underbody cleaning facilities;
  - d) routing of vehicles;
  - e) measures proposed to reduce the potential for amenity impacts or nuisance; and
  - f) measures proposed to minimise the risk of offsite flooding caused by surface water run-off and groundwater.

Reason: In the interests of highway safety, nearby amenity, that construction works may lead to excess water being discharged from the site and to comply with policies DM2, DM15, DM21, DM22 and P2 of the Epping Forest District Local Plan 2011-2033.

16. No development shall take place until a Construction Environmental Management Plan has been submitted to and approved in writing by the County Planning Authority. The approved Plan shall be adhered to throughout the construction phase of the development and shall seek to:

- a) Identify likely waste types/streams to be generated from the demolition and construction of the development;
- b) Outline how this waste is proposed to be managed;
- c) Identify where and how waste will be disposed of (as appropriate); and
- d) Confirm management processes proposed to encourage resource efficiency and increase materials recovery.

Reason: In the interests of ensuring best practice during the construction programme, limiting the amount of residual waste, delivering resource efficiency and to comply with policy DM21 of the Epping Forest District Local Plan 2011-2033.

17. No development shall take place until an Employment and Skills Plan has been submitted to and approved in writing by the County Planning Authority. The approved plan shall be adhered to throughout the construction phase of the development and shall seek to confirm opportunities proposed to be created during the construction phase, either directly or via the appointed contractor, to local people and businesses in terms of new job creation, work placement/experience opportunities and any training programmes to be offered.

Reason: In the interests of attempting to provide opportunities for local employment and training and seeking to drive forward an increase in construction employability levels and workforce numbers.

18. No works except demolition shall take place until a detailed surface water drainage scheme and management/maintenance plan for the site has been submitted to and approved in writing by the County Planning Authority. The drainage strategy shall be based on sustainable drainage principles and an assessment of the hydrological and hydro geological context and should include but not be limited to:
- Limiting discharge rates to 5l/s for all storm events up to and including the 1 in 100 year rate plus 40% allowance for climate change, subject to agreement with the relevant third party. All relevant permissions to discharge from the site into any outfall should be demonstrated.
  - Providing sufficient storage to ensure no off site flooding as a result of the development during all storm events up to and including the 1 in 100 year plus 40% climate change event.
  - Demonstrating that all storage features can half empty within 24 hours for the 1 in 30 plus 40% climate change critical storm event.
  - Final modelling and calculations for all areas of the drainage system.
  - The appropriate level of treatment for all runoff leaving the site, in line with the Simple Index Approach in chapter 26 of the CIRIA SuDS Manual C753. Pollution and treatment indices tables should be provided.
  - Detailed engineering drawings of each component of the drainage scheme.
  - A final drainage plan which details exceedance and conveyance routes, FFL and ground levels, and location and sizing of any drainage features and should demonstrate where the roof run off and learning area drainage.
  - A written report summarising the final strategy and highlighting any minor changes to the approved strategy.

The scheme shall subsequently be implemented as approved.

Reason: To prevent flooding by ensuring the satisfactory storage of/disposal of surface water from the site, to ensure the effective operation of any SuDS features over the lifetime of the development, to provide mitigation of any environmental harm which may be caused to the local water environment, failure to provide the above required information before commencement of works may result in a system being installed that is not sufficient to deal with surface water occurring during rainfall events and may lead to increased flood risk and pollution hazard from the site, to ensure appropriate management and maintenance arrangements are put in place and to comply with policies DM15, DM16 and DM18 of the Epping Forest District Local Plan 2011-2033.

19. The development shall be implemented in accordance with recommendations outlined within the submitted 'Ground Investigation Report', produced by Richard Jackson Engineering Consultants, dated January 2021 with regard to further gas monitoring and mitigation (if required). If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the County Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the County Planning Authority. The remediation strategy, in such an event, shall be implemented as approved.

Reason: To ensure that occupiers and users of development are not put at unacceptable risk from or adversely affected by unacceptable levels of contamination or pollution and to comply with policy DM21 of the Epping Forest District Local Plan 2011-2033.

20. All residential units hereby approved, as part of this development, shall be built in accordance with Part M4(2) Category 2 (Accessibility and Adaptable Dwellings) as set out in the Building Regulations 2010 – Access to and Use of Buildings (Approved Document M Volume 1: Dwellings).

Reason: To ensure that all residential units are provided with reasonable provision for most people to access and incorporate features that make them potentially suitable for a wide range of occupants and to comply with the applicable part of policy H2 of the Epping Forest District Local Plan 2011-2033.

21. Within two months of agreement to the sale of the twentieth residential unit within the building hereby approved, a viability review report shall be submitted to the County Planning Authority for review and approval in writing. The report shall seek to provide an updated position of the development viability based on actual costs and sales, at this point, and re-assess the ability to provide a financial contribution towards affordable housing in Epping Forest District. In the event, that a contribution towards affordable housing is considered viable, the applicant shall as part of this submission provide a commitment to enter into a legal agreement pursuant to section 106 of the Town and Country Planning Act 1990 (as amended), to secure the actual payment of the contribution, within 6 months of approval of the review report submitted. Evidence of payment of any such contribution shall furthermore be provided to the County Planning

Authority within one month following payment.

Reason: To ensure compliance with policy H2 of the Epping Forest District Local Plan 2011-2033.

Informative(s):

- The applicant will have to bear all the costs associated with amending the existing parking restrictions along Traps Hill, to implement the relocated access for the development. The proposed amendments to the parking have nevertheless been agreed in principle by the North Essex Parking Partnership.
- All work within or affecting the highway is to be laid out and constructed by prior arrangement with, and to the requirements and satisfaction of, the Highway Authority, details to be agreed before the commencement of works. The applicants should be advised to contact the Development Management Team by email at [development.management@essexhighways.org](mailto:development.management@essexhighways.org).
- Mitigating and adapting to a changing climate is a national and Essex County Council priority. The Climate Change Act 2008 (amended in 2019) commits the UK to achieving net-zero by 2050. In Essex, the Essex Climate Action Commission proposed 160+ recommendations for climate action. Essex County Council is working with partners to achieve specific goals by 2030, including net zero carbon development. All those active in the development sector should have regard to these goals and applicants are invited to sign up to the Essex Developers' Group Climate Charter (2022) and to view the advice contained in the Essex Design Guide. Climate Action Advice guides for residents, businesses and schools are also available.

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## **BACKGROUND PAPERS**

Consultation replies  
Representations

### **THE CONSERVATION OF HABITATS AND SPECIES REGULATIONS 2017 (AS AMENDED)**

#### Screening

This application has been screened in relation to both the recreational pressures and atmospheric pollution (Pathways of Impact) to Epping Forest Special Area of Conservation as identified within the Local Plan. In this regard:

1. The site lies within the Zone of Influence as identified in the Epping Forest Strategic Access Management and Monitoring Strategy, agreed by Epping Forest District Council's Cabinet in April 2022. Consequently, the development is considered to likely result in a significant effect on the integrity of the Forest because of additional recreational pressures.
2. The development also has the potential to result in a net increase in traffic using roads through the Forest. Consequently, the development is considered to likely result in a significant effect on the integrity of the EFSAC in relation to atmospheric pollution.

In view of the above it is considered necessary to undertake an 'Appropriate Assessment' of the application proposal in relation to both the recreational pressures

and atmospheric pollution Pathways of Impact.

### Appropriate Assessment

Recreational pressures – Epping Forest District Council has adopted a tiered level of financial contribution to offset additional recreation pressures from all developments resulting in net increases in new dwellings within a 6.2km radius of the Epping Forest Special Area of Conservation. Within 0 to 3km radius of the Epping Forest Special Area of Conservation: a contribution of £1,852.63 per dwelling is required; and within 3 to 6.2km radius of the Epping Forest Special Area of Conservation: a contribution of £343.02 per dwelling is required. In addition to the above, a separate contribution of £716 per net dwelling is also required within the parishes of Buckhurst Hill, Loughton and Theydon Bois, when the development is within 3km of the Epping Forest SAC, to contribute toward the implementation of the Roding Valley Recreation Ground/Public Rights of Way infrastructure enhancement project - a recreational mitigation/avoidance measure being secured separate to the costs arising from Epping Forest Strategic Access Management and Monitoring Strategy.

Subject to the securement of contributions in line with the above, the Council is satisfied that the integrity of the Forest and designation would not be adversely impacted by increased recreational pressure resulting from the proposed development.

Atmospheric pollution – This is an allocated site within the Local Plan such that 20 residential units have already been assessed as part of the HRA/AA undertaken to support the Local Plan adoption. If this application had just been for 20 residential units, it is considered a financial contribution in line with the Air Pollution Mitigation Strategy could have simply been sought. This application however seeks 38 units (so an additional 18 to that assessed as part of the Local Plan assessment). The assessment of additional traffic generation from these 18 units, as submitted by the applicant, is however accepted. In respect of this, subject to the mitigation measures proposed, namely a financial contribution in accordance with the Air Pollution Mitigation Strategy (£335 per dwelling); that 17 of the car parking spaces proposed would be ULEV parking only; 50% (or a minimum of 10) of the other car parking spaces would have EV charging provision; cycle parking facilities would be provided; a sustainable travel welcome pack would be provided to occupiers; and a staff travel plan produced, the Council is nevertheless satisfied that additional atmospheric pollution resulting from the development would not adversely impact the integrity of the Forest and designation.

Conclusion - The Council is satisfied that, subject to the satisfactory securement of mitigation measures, by way of planning obligation and/or conditions, that the proposal would not have an adverse effect on the integrity of the EFSAC, either alone or in combination with other plans and projects.

### **EQUALITIES IMPACT ASSESSMENT**

This report only concerns the determination of an application for planning permission. It does however take into account any equality implications. The recommendation has been made after consideration of the application and supporting documents, the development plan, government policy and guidance, representations and all other

material planning considerations as detailed in the body of the report.

## **STATEMENT OF HOW THE LOCAL AUTHORITY HAS WORKED WITH THE APPLICANT IN A POSITIVE AND PROACTIVE MANNER**

In determining this planning application, the County Planning Authority has worked with the applicant in a positive and proactive manner based on seeking solutions to problems arising in relation to dealing with the planning application by liaising with consultees, respondents and the applicant/agent and discussing changes to the proposal where considered appropriate or necessary. This approach has been taken positively and proactively in accordance with the requirement in the NPPF, as set out in the Town and Country Planning (Development Management Procedure)(England) Order 2015.

## **LOCAL MEMBER NOTIFICATION**

EPPING FOREST – Loughton Central



## APPENDIX 1 – Summary of public representations received

<u>Observation</u>	<u>Comment</u>
The existing library building already dominates this part of Traps Hill. A five-storey building would be wholly out of character, by reason of its height and bulk.	See appraisal.
The building would stick out like a sore thumb to anyone walking or driving south down Church Hill, against a backdrop of much lower buildings.	See appraisal.
Impact on the setting of the cricket ground.	See appraisal.
Impact on the setting of 2 Traps Hill (a Grade II Listed Building).	See appraisal.
More car pollution and impact on the air quality in Epping Forest SAC.	See appraisal.
More recreational pressure on Epping Forest and as such more damage.	See appraisal.
A financial payment as mitigation towards damage to Epping Forest SAC is unacceptable. There are no firm plans as to what any such monies would be spent on.	See appraisal.
No affordable housing.	See appraisal.
If a Council development can't provide affordable housing, how can it expect private developers to provide any?	Noted. This application is supported by a viability appraisal that has been independently assessed on behalf of the Council.
The existing building is not that old and should be refurbished.	Noted.
This is an appalling plan.	Noted.
The existing building is fit for purpose and blends into its surroundings. The Council seems bent on demolishing all the nice parts of Loughton and replacing them with monstrosities.	Noted.

Loughton is already congested with inadequate infrastructure.	See appraisal.
Views of the development would be heightened given the land opposite is green space.	See appraisal.
Over-development	See appraisal.
Where are all the cars from the flats going to park?	A basement level car park forms part of the proposals. This would provide 37 car parking spaces for the residential development. See appraisal for further commentary on highways and parking.
The replacement library is smaller in size.	Noted. See appraisal.
The existing building is a lovely building amongst open spaces before it meets the three-storey High Street retail buildings and should be retained and refurbished (if necessary).	Noted.
This library is very popular and is very much needed.	Noted. For confirmation, whilst this application seeks to demolish the existing building, provision within the replacement building is being made for a library service. See appraisal.
Why demolish a perfectly acceptable building?	See appraisal for assessment of justification put forward by the applicant.
Has there been an Environmental Impact Assessment?	No, the development does not meet the threshold for Environmental Impact Assessment. The screening threshold for EIA relating to urban development projects (Schedule 2, Section 10b development) is (i) the development includes more than 1 hectare of urban development which is not dwellinghouse development; or (ii) the development includes more than 150 dwellings; or (iii) the overall area of the development exceeds 5 hectares.
Is there a business case supporting this proposal? Has it been reviewed independently?	Not a material planning consideration.
This is an inappropriate location for such a development.	See appraisal.

The proposal is unsightly.	See appraisal.
This is the hub of the local community and once again an application to build yet more flats will ruin the space that is there.	Noted.
The building would be much larger and taller than that which would surround it. Views from the cricket ground would be unduly impacted.	See appraisal.
This would be a huge eyesore.	See appraisal.
The local road infrastructure can't cope as existing with the levels of traffic.	See appraisal.
Thames Water are unable to cope with the level of demand in the area with old Victorian pipe work. Adding in more demand will put more pressure on the utilities causing more leaks, more roadworks and ultimately more traffic issues.	Noted.
Additional pressure on health services.	See appraisal.
Additional pressures on refuse collections.	See appraisal.
Additional pressures on education facilities.	See appraisal.
Will a temporary library be provided during the construction period?	Yes, although it is understood that the exact location of this is still to be secured by the applicant.
This is all about profit.	Noted.
The local community don't want or need this.	Noted.
Space is simply proposed to be taken away from public use and replaced with private flats.	Noted.
The playground adjacent to the proposal would be affected, as the development would block sunlight to this area.	See appraisal.
The proposed parking provision is	See appraisal.

insufficient and below standards advocated.

A reduced parking provision is proposed on a flawed view of alternative transport options. The Loughton bus service reliability is awful. Buses are infrequent and often don't turn up or diverted.

Noted. See appraisal.

High levels of cycle crime/theft deter usage.

Noted.

How will the additional strain to infrastructure and services be offset?

See appraisal.

The library will be too small.

See appraisal.

Parking will be awful.

See appraisal.

To demolish a sound existing building is environmentally unsound. The existing building could be refitted at much less cost to both the environment and the council rate payers.

See appraisal.

What about embodied carbon?

See appraisal.

This proposal represents environmental and cultural vandalism.

Noted.

Views and vistas from a number of locations/areas will be adversely impacted.

See appraisal.

Will the Council not be satisfied until Loughton instead of looking and being like a pleasant Essex village resembles the worst excesses of the Brutalist Thamesmead Estate?

Noted.

Far too many libraries are being closed, when such places are needed more than ever.

Noted. For confirmation, whilst this application seeks to demolish the existing building, provision within the replacement building is being made for a library service. See appraisal.

If the proposed development was proving affordable housing there could be some excuse, but this is just wrong. Shame on whoever is proposing this.

Noted.

What will happen to the profit from the sale of the flats? Will it be invested back into Loughton?	Not a materially planning consideration. Viability of the proposal in context of affordable housing and financial obligations are nevertheless discussed in the appraisal section of the report.
Accepted that the library needs investment but the library service needs to be the central focus of any re-development plans.	Noted.
Development proposals in this area just seem to be getting higher and its really starting to spoil the whole look of the town.	Noted. See appraisal.
New housing should be created in more sustainable locations.	Noted. See appraisal.
Scaling down the library will no doubt affect the services it is able to provide.	See appraisal.
Concerns about overshadowing.	See appraisal.
As a public development this provides a very poor precedent/example for private developers who will think it carte blanche to ignore all good practice.	Noted.
This proposal will detract from the attractive approach to Loughton coming down Church Hill, with the lovely green open space of the cricket pitch. There is little enough attractiveness or open area left in Loughton and this open aspect should be preserved at all costs.	Noted. See appraisal.
A potential precedent would be set for the re-development of larger properties on Traps Hill and Eleven Acre Rise into apartment blocks if this development is approved.	Noted.
Access into the residential parking area seems tight. And some of the car parking spaces appear to lack a sufficient turning circle to be able to be accessed.	See appraisal.
No details are provided on how the residential parking area would be managed i.e. would spaces be allocated	Each residential unit would be allocated one car parking space, with the exception of one unit which would have no parking

to units or would this be a free for all?	provision. See appraisal for further commentary.
The design is in keeping with the local area but at five stories the height is grossly out of keeping.	See appraisal.
The building should be no more than three stories.	Noted.
The need for new housing is appreciated but there needs to be a more considered and less corporate solution that is more befitting of the surroundings. This is a mass dereliction of duty.	Noted. See appraisal.
Concerns about the contents of the submitted Heritage Assessment and suggested architectural quality of the existing building.	See appraisal.
ECC have neglected this building to justify these proposals.	Noted.
The reference to 'Arts and Crafts' design elements in the finishes of the proposed new building, supposedly echoing some existing buildings in the town, seems wishful thinking when the architect's images are actually viewed.	Noted.
The replacement library would be cramped and unwelcoming. There is also the potential for conflict of activities given the reduced floorspace. Space for community activities within the library will be far more limited than existing.	Noted. See appraisal.
No specific parking provision is proposed for users of the library and/or its staff. In addition, only 37 of the 38 flats would have one car parking space and there is no space for delivery vehicles and/or visitors.	See appraisal.
The lack of parking provision will put added pressure on the Traps Hill public car park.	See appraisal.
Has the Habitat Regulations Assessment submitted by the applicant been reviewed	Yes, please refer to the consultations section for the report for comments



by the Council or an independent consultancy?	received. Further commentary is also provided within the appraisal section of the report.
The mitigation proposed to offset the impacts to air quality and Epping Forest SAC are insufficient.	See appraisal.
Is solar proposed on the roof?	Yes, solar is proposed on parts of the roof. See appraisal.
This is purely a development opportunity to build 38 flats to sell for the benefit of Essex County Council not Loughton. If it was a priority to develop library space the existing serviceable building could and should have been maintained and repaired. Provision of a library is simply an irritation for Essex County Council, who are, no doubt, compelled to provide one.	Noted.
Concerns about impacts to the Oak tree adjacent to the existing library entrance.	The Oak tree is not proposed to be removed as part of these proposals. See appraisal for further commentary.
The current building has problems. It has a hard to maintain design with a flat roof, it has poor access to the High Street and faces away from Traps Hill, meaning users are not engaged at streetscene level. The library is also far too small, which hampers its ability to cater to the needs of its users.	Noted. See appraisal.
The proposed development does nothing to solve any of these issues.	
Adding flats to a design to finance it isn't free and it isn't clever. Selling the rights to aspects of the site is a cost to the ratepayer and I do not want to pay that cost.	Noted.
A better proposal for a new library would be a municipal hub where there is a high quality library and meeting space for the Town Council.	Noted.
Refurbishing the building with modern, energy efficient services would obviate	Noted. See appraisal.

the need for demolition and transporting the demolition waste to landfill. The carbon footprint of the demolition works, transporting and then depositing the waste in landfill followed by the construction of a new building and its associated carbon emissions would seem to be the complete opposite of sustainable.

It is also impossible for the Council to know whether or not any sums required under any s106 agreements, or other arrangements made as part of a potential grant of approval, will turn out to be adequate in respect to impacts to Epping Forest SAC. Mitigation measures are further not being implemented in advance of developments coming forward. This is a clear breach of UK law, as set out in Holohan and other related judgements.

See appraisal.

The existing building is excellently designed with enormous character. Designed by an award-winning architect, it sits comfortably on Traps Hill and manages to both admirably reflect its purpose and the local character of architecture. It has just been shamefully neglected to support these proposals.

Noted.

A number of significant buildings have already been lost in Loughton. Please do not add to this number. Retain and improve our heritage.

Noted.

The proposal completely misses the point that our already large lending library offers free education for all and removing it will only play into the hands of those that would seek to take apart the things that are useful and worthwhile in our society.

Noted. For confirmation, whilst this application seeks to demolish the existing building, provision within the replacement building is being made for a library service. See appraisal.

More housing, with no infrastructure, more traffic etc. This must remain a library, assessable to all.

Noted. For confirmation, whilst this application seeks to demolish the existing building, provision within the replacement building is being made for a library service. See appraisal.

Why is there a garage floor when the use

See appraisal.

of private cars should be discouraged?

No details regarding the wider public realm improvements shown on the drawings submitted, but outside the red line of the application, are provided. Do these improvements actually form part of the proposals?

No, these works, outside of the red line, do not form part of the application. See appraisal for further commentary with regard to this.