

Date: 12th October 2017

Our ref: EF\2017\ENQ\01408

Your ref:



Mr M. Calder
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Dear Mr Calder

Pre-Application Planning Advice - The Old Laundry, Bower Hill Epping.

I refer to our meeting of 19th September regarding the submitted pre-application proposal for 57 dwellings on the above site.

Principle of development:

As you are aware this is the fourth response to pre-application submissions regarding residential development on this site, and you confirmed at our meeting that you have had sight of some, if not all, of these responses. Within these previous responses the Council has accepted the principle of residential redevelopment of the site and recognises it is a sustainable location for housing. Furthermore the site has been allocated in the Draft Local Plan as a potential housing site with potential for approximately 22 dwellings. Whilst this is a material consideration in favour of the development at the current time only limited weight can be attached to this. However should the site continue to be allocated within the Regulation 19 submission then greater weight would be given to this matter.

The previous pre-application responses referred to maximum numbers on the site and it was originally concluded that 30 units would be most acceptable for the site. Following a subsequent submission it was agreed that a draft scheme for 42 units on the site, rising to 5 storeys in height at the boundary with the rail line and dropping to 2 storeys close to the front of the site could be acceptable. This scheme provided amenity space in the form of roof top gardens and additional landscaping space along with 53 car parking spaces.

The most recent pre-application submission (prior to your submission) concluded that the provision of 62 units goes well beyond that which would be feasible within the site. It was considered that the draft scheme for 62 dwellings left little or no space around the buildings and had a significant shortfall in parking spaces. In addition there were concerns that the living conditions of residents of some of the lower level flats, in terms of light and outlook, would fall well short of acceptable levels.

The current draft scheme proposes 57 units, which falls below the 62 previously stated as being too much on the site but is higher than the 42 units previously concluded to be “*the very upper limit of the density that might be achievable here*”.

Whilst I do not disagree with my colleagues previous conclusions regarding the submitted draft schemes I am less willing to state what may or may not be an appropriate figure for the site since this would depend greatly on the size and tenure of the units and the provision of all necessary internal and external space requirements. Therefore I am more open-minded about the ability to provide 57 units on the site provided the previously stated criteria is complied with regarding the acceptable storey heights, the provision of appropriate off street parking provision and amenity space, and the compliance with the National Space Standards. If such a high density with little amenity space is to be considered we will be seeking exceptional quality of external finish to the buildings, the surrounding hard landscaping and the public realm in general to ensure a quality character to the area and in order to create an attractive place to live.

Design:

At the current time the design of the development is only at sketch stage however, as previously stated, the proposed scale of buildings being five storeys towards the railway line lowering to two and a half storey towards the site frontage is considered to be appropriate. The proposed contemporary aesthetic is also considered to be acceptable in this location.

The mirroring of the dwellings fronting Bower Hill and those on Bower Vale is encouraged at these locations in order to retain the character and appearance of the existing street scenes.

Highways/Parking:

The proposed 1:1 ratio of vehicle parking is likely to be acceptable given the sustainable location of the site, however incorporation of visitor spaces would enhance the scheme. Nonetheless additional evidence to support the level of parking will be required by way of the submission of a Parking Provision Analysis and Transport Assessment. The preferred bay size of 5.5m x 2.9m should be used unless sufficient justification for smaller bays is provided.

As stated within the meeting, any vehicular access to the properties fronting Bower Vale is likely to be resisted due to the existing problems with this narrow, heavily parked road. However you are clearly aware of this since parking for these units is proposed to the rear with only pedestrian access provided via Bower Vale.

Amenity:

Given the location of the application site the full amenity space provision (25m² per unit for flats and 20m² per habitable room for houses) would not be sought however some useable communal and/or private amenity space would be expected, particularly for any proposed dwellinghouses to be provided.

The provision of balconies and some communal space areas as shown on the current draft plans is likely to be considered acceptable, particularly given the close proximity to public open space.

As highlighted at our meeting, the distances and relationship between buildings, both proposed and existing (neighbouring), must be carefully considered in order to ensure that there would be no loss of amenity to current or future occupants in and around the site. The spacing between the proposed three storey apartments appear to be acceptable however it is recommended that the flank elevations facing the existing neighbouring dwellings should include measures to avoid overlooking such as the use of high level windows and obscure glazing.

Affordable housing:

Given the location of the site the proposed property mix is considered to be acceptable. Given the size of the proposed development 40% of the proposed residential units would need to be provided as affordable housing in order to comply with Local Plan policy H7A.

The Council would expect to see the proposed property mix of the affordable housing reflect the mix of the market housing, in terms of the ratio of 1, 2 and 3 bedroom properties. It should be noted that properties larger than 3 bedrooms are not required for affordable housing, and therefore should not be included within the mix for either the affordable housing or the market housing.

It should also be noted that, in accordance with the Council's Shared Ownership Policy, at least 70% of the affordable housing would be required as affordable rented housing, and no more than 30% should be provided as shared ownership

With regard to the inclusion of any shared ownership, this can be provided together with either the market housing or the rented housing - depending on the approach taken for the market housing, and the effect the location of the shared ownership has on their values and, therefore, the amount the housing association is able to offer the applicant for the shared ownership properties.

The Council would want to see the affordable housing provided by (i.e. sold by the developer to) one of the Council's Preferred Housing Association Partners. These are:

- B3Living
- East Thames Housing Group
- Hastoe Housing Association
- Moat Housing Group

You may want to contact one or more of the above to discuss potential sale prices for the affordable housing if the development was to receive planning permission, which may assist with the development appraisal. However the landowner should note that the purchase price, even if agreed through a competitive process amongst the Preferred Housing Association Partners, would be much lower than open market value, and would reflect the fact that the price that a housing association could pay would be the net present value (NPV) of the affordable housing based, very simply, on the difference between the income it would receive from (subsidised) rents over a period of time (and any grant) and the costs of purchase, management and maintenance, loan interest payments and other costs over the same period of time. It should also be noted, though, that the service charges would not expect to be subsidised in any way.

The above would need to be agreed by way of a Section 106 Agreement and should be laid out within a Draft Heads of Terms and submitted with the planning application. Should you consider that affordable housing cannot be accommodated on-site or that 40% would be unviable then you would need to submit a fully costed appraisal of how much you assess the off-site contribution/level of affordable housing to be, using the standard valuation method. The Council would then appoint a consultant to validate the proposed amount and you would need to meet the cost of this external assessment. Alternatively if you do not wish to undertake your own assessment then we can appoint a consultant to assess the viability of the scheme on your behalf, again at your cost, and we can then pass the appraisal on to you showing the required amount. I understand this can be done at pre-submission stage should you so wish.

Trees and landscaping:

Whilst there are very few trees within the site the screen of trees along the railway (off site) do need to be considered to ensure that their rooting systems are not impacted upon by the proposal. An application should therefore have tree reports in support in accordance with guidelines with British Standard BS5837:2012 (Trees in relation to design, demolition and construction - recommendations). The tree constraints plan should be used to guide where it is appropriate to develop. A copy of the tree reports should be submitted to support any application. It will also be necessary to provide an indicative landscaping scheme showing the hard and soft landscaping areas, as well as parking provision.

Ecology:

Due to the large number of vacant buildings on site and the fact that bats have been recorded in the area the presence or absence of protected species on site must be accounted for. A Phase I Ecology Survey, with particular reference to bats, should therefore accompany the application.

Refuse:

With regards to refuse collection any submitted scheme should demonstrate that there is adequate access for refuse vehicles to enter the site and to turn around once on site so that they may exit without reversing out and that adequate storage facilities are provided should communal bins be required.

Land Drainage:

Due to the size of the development a Flood Risk Assessment (FRA) will be required focussing on the surface water drainage strategy which should incorporate the use of SuDS to dispose of surface water. A management and maintenance plan should be included within the FRA.

Contamination:

Due to its use as a Laundry & Dry Cleaners and Repair & Vehicle Repair Garage and the surrounding contaminative land uses (Gas Works, Brickworks, Railway & Industrial Estate), there is the potential for contaminants to be present on site.

Domestic dwellings with gardens are classified as a particularly sensitive proposed use and therefore, in line with CLG National Planning Guidance '[Land Affected by Contamination](#)', a Phase 1 report would be required, which could be dealt with by conditions.

Conclusion:

The principle of redevelopment for housing is accepted subject to careful consideration with regards to the impact on neighbouring residents and detailed designs.

Should you wish to submit an application of this nature, in accordance with the Validation Checklist, we would expect the following documentation to be provided (for full details please visit www.eppingforestdc.gov.uk):

- Planning, Design and Access Statement;
- Draft Heads of Terms or viability assessment regarding affordable housing provision;
- Transport Statement;

- Parking Provision Analysis;
- Tree Reports;
- Evaluation of tree constraints;
- Indicative landscape scheme;
- Flood Risk Assessment – including management & maintenance plan;
- Phase 1 Ecological Survey; and
- Phase 1 Contaminated Land Survey (although this could be dealt with by condition).

Other documentation and/or plans may be helpful upon submission but may not be required to register the application. Furthermore, additional documentation may be considered necessary at validation stage depending on the final details of the application received.

Should planning permission be granted for the proposal, please be aware that our colleagues in Building Control currently provide free pre-application advice for Building Regulations applications. Please contact Building Control on 01992 564141 to speak to one of our surveyors regarding this matter.

I hope the above comments are of assistance, however please note that these views are purely Officer opinion and are given without prejudice to the final decision of the Council on any planning application received. If you wish to discuss any further schemes, and an additional meeting is requested or further research is needed, we usually charge at a rate of £80 per hour. Please contact me should you need to discuss these matters further.

Yours sincerely

Graham Courtney
Senior Planning Officer