

Loughton Residents Association Plans Group



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69 Burney Drive
Loughton
Essex IG10 2DX
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County Planning
Essex County Council E2,
County Hall Chelmsford
Essex CM1 1QH

Dear Sir

CC/EPF/88/22 - Loughton Library, Traps Hill, Loughton, Essex, IG10 1HD

Proposal: 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

We object to this application.

The existing library, at two storeys, dominates this part of Traps Hill which is characterised by open spaces before it meets the three-storey high street retail buildings. The proposed five storey building, by reason its height and bulk is wholly out of character with the area and will dominate the setting of Traps Hill. Because of the lack of buildings at the Church Hill side of the cricket ground, the new building will also stand out like a sore thumb to anyone walking or driving south down Church Hill, against a background of much lower buildings. It will also significantly harm the setting of the cricket ground which is one of the very few grounds still located in the centre of such a large urban settlement like Loughton.

It is utter nonsense to claim in the design and access statement the playing fields justify the increase in height. On the contrary, in townscape terms, with nothing on the opposite side of Traps Hill the site should be a transitional height and certainly no higher than the ambient heights of the domestic dwellings further up Traps Hill.

The extensive bulk of the new building will impact on the setting of the Grade Two listed 2 Traps Hill. This is a very important local building; the renowned Victorian architect James Cubitt (1836 – 1912) lived and died here and was buried in an unmarked grave next to his wife in Loughton Cemetery. We ask officers check the view on Figure 8 of the Heritage Statement is actually “verified”. The view of 2 Traps Hill from the High Street (arguably the most important view) will be compromised by the new development and cause harm to its setting. Whilst the impact may be less than substantial harm it is on the high end of the less than substantial harm test under the NPPF. The pleasure of viewing this local treasure of a building is greatly distracted by the new development. Epping Forest’s Heritage Policy HC12 states *‘The Council will not grant planning permission for development which could adversely affect the setting of a listed building.*

The basement car park is unworkable; many of the spaces such as spaces 26 to 30 and space 37 lack a turning circle for cars to manoeuvre out of the spaces. We do not agree the swept path analysis is right in the Transport Statement; many cars are longer than 5.079m. We note staff will be expected to park in the public car park. This car park is heavily used; expecting staff to park in the public car park as well as visitors to the residential development will further erode the spaces available for members of the public.

The application proposes 38 additional dwellings which means more car pollution and a subsequent impact on the air quality to the SAC. Any additional dwelling that leads to more traffic in the SAC is unacceptable. The additional dwellings will also result in more pressure for the overstressed recreational services and subsequent damage to the SAC.

The current proposed solution to bring in a Clean Air Zone (CAZ) in 2025 is not guaranteed to happen and in any event does not stop additional cars associated with new dwellings from polluting the SAC before the CAZ is brought into operation.

We are very concerned that the Council has been giving planning approvals for housing developments near to the Epping Forest Special Area of Conservation (EFDSAC); in doing so it is requiring sums to be paid under s106 agreements with reference to the Council's Interim Air Pollution Mitigation Strategy (IAPMS).

Not only is it impossible for the Council to know whether or not the sums required under the s106 agreements will turn out to be adequate, the mitigation measures are not being implemented in advance of the new dwellings being built and the subsequent harm to the SAC from the additional traffic. This approach is in clear breach of UK law, as set out in Holohan and other related judgements.

It is not sustainable to knock down existing buildings and replace them with completely new builds. The existing building represented an enormous investment in carbon and energy already, and to simply throw it into the skip is unacceptable.

Historic England's Heritage Counts report confirms knocking down buildings releases embodied carbon dioxide (CO₂) which is stored inside them and contributes to climate change. An owner can adapt an old building and reduce CO₂ emissions by more than 60%. Historic England claim replacing a traditional Victorian terrace property with a new building of the same size produces up to 13 times more embodied carbon, which equates to about 16.4 tonnes of CO₂. This proposed development will be significantly higher than that.

It is irresponsible for a public authority to argue the cost of repairs is too great, to justify such a large development. The council has let the building get into its current condition and should find the funds to repair it and responsibly retain the embodied carbon dioxide which is stored inside it. The council needs to resist the loss of existing fabric and insist the existing dwelling is retro fitted with sustainable energy efficiencies and improved rather than allowing it to be demolished and sent to landfill. Any scheme that replaces an existing building should have a carbon assessment of the whole-life carbon footprint of it compared to the option of re-use. The existing building is not that old and should be refurbished.

The additional vehicular movements to remove the entire existing building and replace it with a brand new one will also impact on the EPSAC.

We object to the lack of any affordable housing. If councils are providing zero affordable housing in their schemes, how can they expect private developers to provide any? There needs to be an independent viability report commissioned from Epping Forest District Council to ensure there is no bias in the report.

No statement of community involvement (SCI) has been submitted with the planning application. We ask that an SCI is provided. In the absence of this we ask under the Freedom of Information Act for all correspondence at the pre app stage including emails, survey responses, letters etc received be shared with the LRA Plans Group.

We disagree the reduction in library space is made up by a better layout for the new premises. Not only is there no staff parking (see above), there are far too many blind areas that are unobserved by staff. It is not good enough to rely on CCTV as an alternative.

No details have been provided regarding the relocation of the existing recycling bins. This will cause problems in the future; the new residents in the development are likely to complain about the general disturbance recycling bins cause.

Overall, this large unwelcome lump of a development causes substantial harm to the character and function of this part of Loughton. There is no public benefit, particularly in the absence of any affordable housing, and planning permission should therefore be refused.

We give permission for our comments to be made available on the Council Website

Yours faithfully

A handwritten signature in black ink, appearing to read 'John Walker', with a horizontal line drawn through it.

John Walker MRTPI
for Loughton Residents Association Plans Group