

Essex County Council - Highways – 7 December 2020

PLEASE NOTE THAT FURTHER TO THE RECEIPT OF REVISED INFORMATION AND THE REMOVAL OF THE PHASE 2 DEVELOPMENT PROPOSAL, THIS RECOMMENDATION SUPERSEDES THE PREVIOUS DATED 22 NOVEMBER 2019.

The Highway Authority has undertaken extensive investigation and analysis of the submitted information. The removal of the Phase 2 development proposal essentially halves the traffic impact of the proposed development and consequently it will not result in a severe impact upon the highway network.

This site is identified in Epping Forest DC's Local Plan Submission and it should be noted that the applicant intends to fully implement the required Local Plan highway improvements, at Jct 26 M25, for this allocation, whilst providing an extensive package of sustainable measures which will improve connections to sustainable modes for the site and the locality.

Consequently, given the package of appropriate mitigation (highway works and sustainable travel), the Highway Authority has concluded that the proposal will not be detrimental to highway safety, capacity or efficiency at this location or on the wider highway network.

From a highway and transportation perspective the impact of the proposal is acceptable to the Highway Authority subject to the following measures:

1. No development shall take place, including any ground works or demolition, until a Construction Management Plan has been submitted to and approved in writing by the local planning authority. The approved Plan shall be adhered to throughout the construction period. The Plan shall provide for the following:

Safe access into the site

The parking of vehicles of site operatives and visitors

Loading and unloading of plant and materials

Storage of plant and materials used in constructing the development

Wheel and underbody washing facilities

Reason: To ensure that on-street parking of these vehicles in the adjoining streets does not occur and to ensure that loose materials and spoil are not brought out onto the highway in the interests of highway safety.

2. Prior to the first occupation of the development the highway improvement works as shown in principle on Vectos M25 Junction 26 Southern Roundabout Draft Improvements drawing number 173131_A12 Rev B, shall be fully implemented, to include but not limited to the following:

Formalisation of two lanes on the M25 westbound off-slip;

Widening to the Dowding Way and Honey Lane (east) arms;

Banning Right-Turn Movement into Forest Side (which will require its own Traffic Regulation Order).

Reason: The improvements have been proposed to provide safe and efficient operation of the M25 Junction 26 and will deliver the Local Plan improvements for this junction and the surrounding highway network.

3. Prior to the first occupation of the development the access works, as shown in principle on Vectos drawing no. 173131_A17 Rev B, shall be fully implemented, with all detail being agreed with Highway Authority, the works shall include, but not be limited to:

A new traffic signal-controlled junction on Dowding Way A121 (commuted sum for 15 years maintenance to be calculated at S278 stage);
Cycleway provision from the site to Footpath no.62 Waltham Abbey and to the east of the site;
Creation/implementation of any Traffic Regulation Orders etc. as necessary for the proposed signalised junction;

Reason: In the interests of highway safety, efficiency and accessibility.

4. Prior to the first occupation of the development the cycleway provision along the route of Footpath no.62 Waltham Abbey and up to Roundhills, as shown in principle on drawing no.4356 A136 P1, shall be fully implemented, with all details being agreed with the Highway Authority.

Reason: In the interests of reducing the need to travel by car and promoting sustainable development and transport.

5. Prior to the first occupation of the development the vehicle/cycle parking and turning areas as indicated on the approved plans shall be provided, hard surfaced, sealed and marked out. The parking and turning areas shall be retained in perpetuity for their intended purpose.

Reason: To ensure that appropriate parking and turning is provided.

6. A Workplace Travel Plan is to be submitted to and approved by the Council (in consultation with Essex County Council) prior to occupation of the development which shall include the following details:

travel plan co-ordinator;
travel surveys;
measures to be taken to encourage walking, cycling, use of public transport and reduce car travel by staff;
monitoring and review in collaboration with ECC;
programme for implementation.

The approved travel plan shall be actively implemented for a minimum period of 5 years. It shall be accompanied by a monitoring fee of £5,000 (five thousand pounds plus the relevant sustainable travel indexation) to be paid before occupation to cover the 5-year period.

Reason: In the interests of reducing the need to travel by car and promoting sustainable development and transport.

7. The provision of a Demand Responsive Transport bus service operated by Arriva under the “Arriva Click” banner with a total funding limit of £800,000 (eight hundred thousand pounds).

Reason: In the interests of reducing the need to travel by car and promoting sustainable development and transport.

8. Prior to the first occupation of the development a Routing Management Plan and a Car Park Management Plan shall be submitted to and approved by the Council. The approved details shall be adhered to throughout the life of the development.

Reason: In the interests of highway safety and efficiency by the routing of HGV's onto appropriate roads.

The above measures are to ensure that this proposal is not contrary to the Highway Authority's Development Management Policies, adopted as County Council Supplementary Guidance in February 2011, policies ST2, ST4 & ST6 of the Local Plan and policy T1 of the Local Plan Submission Version 2017.

Informative

- i. The above measures should be secured by condition or planning obligations.
- ii. Any structures, signals and non-standard materials/lighting proposed within the existing extent of the public highway or areas to be offered to the Highway Authority for adoption as public highway, will require a contribution (commuted sum) to cover the cost of future maintenance for a minimum period of 15 years following construction.
- iii. 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 or by post to: SMO3 - Essex Highways, Childerditch Highways Depot, Hall Drive, Brentwood. CM13 3HD.
- iv. The Highway Authority cannot accept any liability for costs associated with a developer's improvement. This includes design check safety audits, site supervision, commuted sums for maintenance and any potential claims under Part 1 and Part 2 of the Land Compensation Act 1973. To protect the Highway Authority against such compensation claims a cash deposit or bond may be required.
- v. The Public Right of Way network is protected by the Highways Act 1980. Any unauthorised interference with any route noted on the Definitive Map of PROW is considered to be a breach of this legislation. The public's rights and ease of passage over public footpath no.62 Waltham Abbey, shall be maintained free and unobstructed at all times to ensure the continued safe passage of the public on the definitive right of way.

The grant of planning permission does not automatically allow development to commence. In the event of works affecting the highway, none shall be permitted to commence until such time as they have been fully agreed with this Authority. In the interests of highway user safety this may involve the applicant requesting a temporary closure of the definitive route using powers included in the aforementioned Act. All costs associated with this shall be borne by the applicant and any damage caused to the route shall be rectified by the applicant within the timescale of the closure.

Essex County Council – 8 January 2020

Essex County Council has reviewed the additional and updated information submitted in support of this application and has no further comments to make in relation to Early Years and Childcare (EYCC) requirements or economic growth and skills. We do have the following comments to make however.

1. Highways and Transportation

Comments to be provided separately.

2. Environment and Green Infrastructure

It is positive that some of the issues and recommendations identified in ECC's initial response to this application have been considered, especially with regard to landscaping and the specification for the landscape design/plan, materials and species planted. Multi-functional green infrastructure (GI) has also been incorporated in the design. We have no further comments to make on the Landscape Specification Overview and the Landscape General Arrangement Plan.

The Landscape specification Overview states that it needs to be read in conjunction with both the Landscape General Arrangement Plan (ref 11403_PO7j); and Design Code Document (ref 11403_RO2d) however, the Design Code Document appears to not be available. We would still recommend that GI should be at the heart of decision-making at every stage in the planning and design process for the development from the outset.

Stewardship

Stewardship of the GI still needs to be addressed. It is unclear how the long-term management of GI will be implemented. This needs to be considered at an early stage in planning for development to ensure it is considered in the viability assessment of the site and on-going maintenance. Timely engagement with bodies responsible for various elements of GI can help to address some of the issues, and identify the opportunities to incorporate wider GI networks on the site.

Key questions to consider include:

Does the development have a long-term management and maintenance arrangement that states the function and benefits of all GI components and their maintenance regimes?

Have mechanisms to fund the management and maintenance regime been identified and agreed?

Have key stakeholders been engaged at the pre-planning stage in the design protection and enhancement of GI and the landscape?

Construction Environment Management Plan (CEMP)

A CEMP will be produced (as referred to within the Environment Statement) to mitigate the impacts on the retained GI such as trees. This will need to clearly set out the protection measures and plan for GI, and should incorporate the recommendations within the Arboriculture Impact Assessment.

Key questions to consider include:

How will the existing GI that is to be preserved and enhanced be protected during construction?

Will the development be planting GI from the beginning of construction rather than at the end? As per our previous comments, this can ensure essential GI can become established, mature and resilient before the full development is completed, creating an attractive landscape framework and can act as a buffer as the site develops.

How will the CEMP be monitored?

GI Standards and Accreditation

As per our previous comments, applying the Building with Nature standards should be considered alongside the ambition for BREEAM 'Excellent' standards for buildings. Accreditation could be achieved to create an exemplary employment development, highlighting what good looks like at

each stage of the GI lifecycle, and strengthening the development by creating a place that really delivers for people and wildlife.

3. Flood Risk and Development

Additional comments have already been provided separately in relation to flood risk and drainage on this site.

4. Conclusion

These comments should be considered in conjunction with previous comments submitted by ECC. In determining this application careful consideration should be given to the highways and transport requirements, need for childcare provision as a result of the development, an Employment Skill Plan (ESP) approach with ECC to explore the wider potential social and economic benefits of this proposal, suitable connectivity, appropriate multi-functional GI provision, and implementation of suitable flood risk measures.

ECC has reviewed the proposal and accompanying documents and has a number of comments and recommendations to make in relation to the proposed development at this site.

1. Planning (Major Development and New Communities)

The application site is one of the largest new employment land allocations identified in Epping Forest District Council's (EFDC) draft Local Plan with up to 10ha anticipated to be delivered during the plan period (Policy P3). Although this draft Local Plan has advanced through the plan-making process, it is still being examined by a Planning Inspector.

The application site therefore remains designated as Metropolitan Green Belt. These are all relevant material considerations identified in the applicant's Planning Statement for consideration. It will be up to EFDC as the Local Planning Authority to satisfy itself that 'very special circumstances' exist to justify approval of this application prior to adoption of the EFDC's Local Plan. The application site is located between a strategic road (M25) to the north and a major road (A121) to the south, with the existing Meridian Business Park and Sainsbury's Distribution Centre further to the west. Given its potentially prominent location as a result of the proposed scheme, it is positive that the application site has been through three Quality Review Panels. ECC is supportive of this approach, as good design is integral to good place making - regardless of whether the proposed scheme is for prominently residential or employment uses. ECC is also encouraged by the applicant's aspirations for building to a BREEAM 'Excellent' rating, as outlined in the Sustainability Statement, and their ambition to achieve 'Outstanding'.

2. Highways and Transportation

The Highway Authority has undertaken extensive investigation and analysis of the submitted information, together with a large quantity of additional information supplied during the previous application. This work has concluded that the proposal is not contrary to current National and Local policy and safety criteria and has been found acceptable to the satisfaction of the Highway Authority in terms of its impact upon the local highway network.

This site is identified in Epping Forest DC's Local Plan Submission and it should be noted that the applicant intends to fully implement the required Local Plan highways improvements, at Jct 26 M25, for this allocation, whilst providing an extensive package of sustainable measures which will improve connections to sustainable modes for the site and locality.

Consequently, given the package of appropriate mitigation (highway works and sustainable travel), the Highway Authority has concluded that the proposal will not be detrimental to highway safety, capacity or efficiency at this location or on the wider highway network.

From a highway and transportation perspective the impact of the proposal is acceptable to the Highway Authority subject to the following measures:

1. No development shall take place including any ground works or demolition, until a Construction Management Plan has been submitted to and approved in writing by the local planning authority, The approved Plan shall be adhered to throughout the construction period. The Plan shall provide for the following:

- Safe access into the site
- The parking of vehicles of site operatives and visitors

- Loading and unloading of plant and materials used in constructing the development
- Wheel and underbody washing facilities.

Reason: To ensure that on-street parking of these vehicles in the adjoining streets does not occur and to ensure that loose materials and spoil are not brought out onto the highway in the interests of highway safety.

2. Prior to the first occupation of the development the highway improvement works as shown in principle on Vectos M25 Junction 26 Southern Roundabout Draft Improvements drawing number 173131_A12, shall be fully implemented.

Reason: The improvements have been proposed to provide safe and efficient operation of the M25 Junction 26 and will deliver the Local Plan improvements for this junction.

3. Prior to the first occupation of the development the access works as shown in principle on Vectos number 173131_A17 Rev B, shall be fully implemented, with all detail being agreed with Highway Authority, the works shall include, but not limited to:

A new traffic signal-controlled junction on Dowding Way A121;

Cycleway provision from the site to Footpath no. 62 Waltham Abbey and to the east of the site;

Creation/implementation of Traffic Regulation Orders etc. as necessary for the proposed signalised junction.

Reason: In the interests of highway safety, efficiency and accessibility.

4. Prior to the first occupation of the development the cycleway provision along the route of Footpath no. 62 Waltham Abbey and up to Roundhills, as shown in principle on drawing no. 4356 A136 P1, shall be fully implemented, with all details being agreed with the Highway Authority.

Reason: In the interests of reducing the need to travel by car and promoting sustainable development and transport.

5. Prior to the first occupation of the development the vehicle/cycle parking and turning areas as indicated on the approved plans shall be provided, hard surfaced, sealed and marked out. The parking and turning areas shall be retained in perpetuity for their indicated purpose.

Reason: To ensure that appropriate parking and turning is provided.

6. A Workplace Travel Plan is to be submitted to and approved by the Council (in consultation with Essex County Council) prior to occupation of the development which shall include the following details:

Travel plan co-ordinator;

Travel surveys;

Measures to be taken to encourage walking, cycling, use of public transport and reduce car travel by staff;

Monitoring and review in collaboration with ECC;

Programme for implementation.

The approved travel plan shall be actively implemented for a minimum period of 5 years. It shall be accompanied by a monitoring fee of £5,000 (five thousand pounds plus the relevant sustainable travel indexation) to be paid before occupation to cover the 5-year period.

Reason: In the interests of reducing the need to travel by car and promoting sustainable development and transport.

7. The provision of a Demand Responsive Transport bus service operated by Arriva under the "Arriva Click" banner with a total funding limit of £650,000 (six hundred and fifty thousand pounds).

Reason: In the interests of reducing the need to travel by car and promoting sustainable development and transport.

8. A contribution of £150,000 (one hundred and fifty thousand pounds) towards sustainable transport initiatives to be agreed with County Council.

Reason: In the interests of reducing the need to travel by car and promoting sustainable development and transport.

9. Prior to the first occupation of the development a Routing Management Plan shall be submitted to and approved by the Council (in consultation with the Highway Authority).

Reason: In the interests of highway safety and efficiency by the routing of HGV's onto appropriate roads.

The above measures are to ensure that this proposal is not contrary to the Highway Authority's Development Management Policies, adopted as County Council Supplementary Guidance in February 2011, policies ST2, ST4 & ST6 of the Local Plan and policy T1 of the Local Plan Submission Version 2017.

3. Early Years and Childcare (EYCC)

This planning application would provide a new building for warehouse use and for up to 22,733sqm of employment floor space. The applicant has indicated this proposal would require 1,066 full time employees. With reference to 'Employment Densities' published by the Homes and Communities Agency in 2010 ECC has calculated that the proposed development would generate 42.64 EYCC pupils.

Any developer contribution figures referred to in this response are calculations only, and final payments will be based on the actual unit mix and the inclusion of indexation.

The proposed development is located within the Waltham Abbey South ward of the Epping Forest District. According to ECC's childcare sufficiency data, published in Summer 2019, there are 5 full time day care providers in this ward providing a mixture of sessional and full day care. There are no recorded vacancies listed for this ward. For ECC to meet its statutory duties to provide childcare that will enable families to be able to work or study it must both facilitate sufficient places to meet free childcare entitlement demand and also ensure a diverse range of provision so that different needs can be met.

A contribution will therefore be required and an additional 42.64 places would be provided at an estimated cost of £742,874.10 at April 2019 prices. This equates to £17,422 per place and so, based on demand generated by this proposal set out above, a developer contribution of £742,874.10, index linked to April 2019, is sought to mitigate its impact on local EYCC provision.

In view of the above, if planning permission for this development is granted it should be subject to a S106 agreement to mitigate its impact on childcare provision. ECC's standard formula S106 agreement clauses that ensure the contribution would be fairly and reasonably related in scale and kind to the development are available from Essex Legal Services.

If EFDC were minded to turn down this application, ECC would be grateful if the lack of surplus childcare provision in the area to accommodate the proposed new development can be noted as an additional reason for refusal, and that ECC are automatically consulted on any appeal or further application relating to the site.

4. Education (Primary and Secondary)

This proposed development will not attract an education contribution in relation to primary or secondary education needs.

5. Economic Growth and Skills

A key employment sector for Epping Forest District is Construction, with over 1,500 construction enterprises in 2018 (Enterprises by industry sector) and a construction workforce of 6,000. Circa 11% of residents do not have a level 1 qualification and circa 22% do not have a level 2 qualifications.

ECC welcomes measures in place to minimise disruption and manage the effect of the development on existing residents, businesses and the local economy. We welcome the development of a Construction Environmental Management Plan, Construction Traffic Management Plan and the site being a registered Considerate Constructor. We support the use of the Construction Industry Training Board (CITB) labour forecast tool to predict employment number however, we feel that the measures in place do not go far enough, to ensure local residents benefit from the opportunities arising from the construction phase. Appropriate social value and economic development realisation is not suitably addressed.

The CITB has developed a National Skills Academy model which creates an environment to support supply chains to grow their business by supporting employment, skills and Apprenticeships. The approach includes employer-led benchmarks for employment, skills and Apprenticeship delivery against procurement lot sizes of £1 million upwards, making engagement in this agenda directly accessible to small and medium enterprises (SMEs), as well as larger contractors and their supply chain effects and spending by construction workers in the Local Area, the proposals do not go far enough to support the economic growth of the local supply chain. Commitments to local labour targets, supporting SME apprenticeship growth, Apprenticeship Levy utilisation are some additional mechanisms that could be adopted to mitigate the impact of the development economically.

The Government is committed to driving Apprenticeship opportunities and placing employers in a focal role in developing the standards for workplace training and we would welcome the adoption and partnership of a construction phase Employment and Skills Plan. This would locally support an investment in skills. It will also help address the national shortage of construction workers, which is prevalent in Essex, given the breadth of current and future anticipated local growth. With Epping's proximity to London, these shortages are exacerbated. Adopting an Employment and Skills Plan (ESP) approach with ECC, will help develop a positive local community towards construction, and give back to the wider community as social value. This would include Apprenticeship opportunities arising from the development, school and college outreach and work placements.

ECC welcomes the indicative information on the likely number of jobs that will be generated by Phase 1 of the development and using the Homes and Communities Agency (HCA) Employment Density Guide for forecasting employment opportunities in phase 2. These phases present opportunities for local employment opportunities and in particular an opportunity to aid social mobility, giving and supporting opportunities for those furthers away from the job market or those hardest to reach.

ECC would welcome further investment and commitment to enabling pre and supported employment opportunities through an ESP. Such investment, based on the HCA Density Guide for forecasting employment, would enable the commissioning of skills interventions and training. For example, this could support a Sector Based Work Academy or Specialist Employability Support for learners with Special Educational Needs or Disabilities.

ECC is looking to strengthen its commitment to increased employability and skill and is currently proposing, through its consultation on its refreshed Essex Developer's Guide to Contributions, for the construction phase a model pursuant to the National Skills Academy. The refreshed guide also includes the adoption of end-use ESPs and monetary contributions towards skills.

We therefore would welcome this development to have increased regard to economic, social and environmental well being and welcome further dialogue on the points raised above.

6. Broadband and Connectivity

In line with objectives stated in the Government's Future Telecoms infrastructure Review 2018, all new developments should include provision of future proofed internet access, ideally Fibre to the Premises. Where this is possible, provision of fully operational 5G mobile connectivity may also be accepted as appropriate broadband coverage, if arrangements are made for all premises in the development to access this at affordable prices, comparable to a fixed-line fibre broadband service, and this access is fully available at the time of completion of the build.

Plans for such an approach should be submitted for review by the Local Planning Authority. Applicants are expected to proactively contact a telecommunications network operator of their choice to plan for internet connectivity installation as part of the build process. Applicants are expected to provide details of their plans to install internet connectivity as part of their planning applications.

The applicant should be aware that in Essex, alternative network operator Gigaclear Plc has a significant full-fibre network deployment in Epping Forest District. Gigaclear is likely to be keen to extend its own FTTP network to new business parks. Other operators may be available however.

7. Environment and Green Infrastructure

The Design and Access Statement (DAS) mentions that the development aspires to be exemplar and achieve BREEAM 'Excellent' and focus on the low energy sustainability design through solar panels and EV. However it does not mention the importance of Green Infrastructure (GI) and landscaping, even though it refers to the influence of local landscape character on the final design.

GI is more than just a green space, it is a terms used to describe the network of natural and semi-natural, such as Epping Forest SAC, and engineered spaces and corridors that act as living infrastructure within and between our villages, towns and cities. GI should be at the heart of decision making from the outset in the planning and design process for the development, and should be referred to throughout the DAS with clear commitments, which can be followed through to reserved matters stage.

Defra's 25 Year Environment Plan asks for 'new, strong standards for green infrastructure'; and the new National Planning Policy Guidance keeps green infrastructure front and centre in its approach to delivering net gains for the environment. The emerging Environment Bill will put the actions within the 25 Year Environment Plan into law.

A new standard has been developed by Building with Nature to overcome the perceived and actual complexity of delivering high quality GI and has won a RTPi Award for Research Excellence. Drawing from evidence and good practice on all aspects of GI - wellbeing, water and wildlife - the standard defines high quality GI at each stage of the development process from planning and design, through to long-term management and maintenance. There are nationwide examples of where these standards have been successfully implemented. This approach has been endorsed by Natural England, who is reviewing the current national green infrastructure standards. Building the Nature provides a framework of quality standards, an assessment and accreditation service, and national awards. By providing an accreditation at the plan/design stage, Building with nature also starts to raise confidence in the planning and development sector that can achieve a collective understanding of why GI matters, and how to deliver it more consistently to accelerate the delivery of new homes and new places.

Other documents to be taken into consideration are the emerging Green Essex Strategy, Essex SUDs Design Guide and Essex Design Guide.

It is positive that the proposal will aim to increase biodiversity through net gain as mentioned in the supporting documents. However consideration should be given to the wider implementation of an environmental net gain principle within the design of all green and blue infrastructures, utilising locally native species or those with a proven value to wildlife, wherever possible.

This proposal, whilst in proximity to Epping Forest SAC, represents a particular opportunity to create an exemplar employment development in this location to create an environment that really delivers for people and wildlife. It is therefore recommended that this proposal seeks to apply the Building with Nature standards and achieves accreditation.

Key questions to consider include:

Does the proposal explicitly recognise the value of GI in terms of economic, environment and social benefits?

Have viability assessments considered all the multi-functional characteristics and benefits of GI?

Is GI an integral design component considered at the pre-planning stage?

Is GI designed to deliver a wider landscape GI network?

Does the development use GI to retain and expand habitat networks including nature recovery networks?

Planting and Green Spaces

The DAS mentions additional planting will be provided as part of the development and mentions some of the species, but it needs to provide more details of the:

- Tree planting
- Design of the public open space
- Type of species to be used
- Long-term stewardship

It is important that green spaces are not single purpose use, but are multifunctional to deliver multiple benefits i.e. recreation, flood management, environment net-gains etc. (see Scottish National Heritage information) and create synergies, while reducing conflicts and trade-offs and ensuring that this space fit in its natural settings and landscape character as far as possible.

Key questions to consider include:

Has the proposal adequately used GI to provide local recreational activities, walking and cycling opportunities?

Has new and existing GI been incorporated to enhance opportunities for active and healthy travel?

Does the development setting and site appraise for multiple green infrastructure functions and benefits?

Stewardship

The long-term management of GI needs to be considered at an early stage in planning for development to ensure it is considered in the viability assessment of the site and on-going maintenance. Stewardship should be referred to in the supporting documents for this development. Timely engagement with bodies responsible for various elements of GI can help to address some of the issues and identify the opportunities to incorporate wider GI networks on the site.

Key questions to consider include:

Does the development have long-term management and maintenance arrangements that states the function and benefits of all GI components and their maintenance regimes?

Have mechanisms to fund the management and maintenance regime been identified and agreed?

Key stakeholders have been engaged at the preplanning stage of the development in the design, protection and enhancement of green infrastructure and the landscape?

Construction:

It is positive that existing GI such as existing trees, hedgerows and links to the PRoW (walking and cycle network) on site is considered and incorporated into the masterplanning, which is crucial and can avoid costs of retrofitting at a later stage. It is also important to understand what types of GI are specifically required for the community and its context helps to avoid either over- or under-provision of GI. The implementation of new GI at the beginning of the development construction, rather than at the end allows time for the GI to establish, mature and become resilient before the full development is completed. It can also have the added benefit of creating an attractive landscape framework and can act as a buffer as the site develops therefore reducing the aesthetic impact from the construction work. Given that the majority of existing GI is around the boundary of the site, the proposal will retain and protect some existing trees, hedgerow and shrubs. The recommendations within the Environmental Statement mentions a Construction Environment Management Plan to

mitigate the impacts. It would be helpful to understand how existing Gi will be protected during construction.

Key questions to consider include:

How will the existing GI that is to be preserved and enhanced be protected during construction?

Will new GI be planted at the beginning of construction rather than at the end?

8. Flood Risk and Development

As the Lead Local Flood Authority (LLFA) ECC provides advice on SuDS schemes for major developments. We have been statutory consultee on surface water since the 15th April 2015. In providing advice ECC looks to ensure sustainable drainage proposals comply with the required standards as set out in the following documents:

- Non-statutory technical standards for sustainable drainage systems
- ECC's adopted Sustainable Drainage Systems Design Guide
- The CIRIA SuDS Manual (C753)
- BS8582 Code of practice for surface water management for development sites

Lead Local Flood Authority Position

Having reviewed the Flood Risk Assessment and the associated documents which accompanied the planning application, we do not object to the granting of planning permission based on the following:

Conditions - phase 1 (full application)

Condition 1:

No works except demolition shall take place until a detailed surface water drainage scheme for the site, based on sustainable drainage principles and an assessment of the hydrological and hydro geological context of the development, has been submitted to and approved in writing by the local planning authority. The scheme should include but not be limited to:

- Limiting discharge rates to 30.22 l/s for phase 1 and 2 for all storm events up to and including the 1 in 100 year rate plus 40% allowance for climate change.
- Demonstrate that all storage features can half empty within 24 hours for the 1:100 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.
- 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.
- A written report summarising the final strategy and highlighting any minor changes to the approved strategy.

Reason

To prevent flooding by ensuring the satisfactory storage of/disposal of surface water from the site.

To ensure the effective operation of 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.

Condition 2:

No works shall take place until a scheme to minimise the risk of offsite flooding caused by surface water run-off and groundwater during construction works and prevent pollution has been submitted to, and approved in writing by the local planning authority. The scheme shall subsequently be implemented as approved.

Reason

The National Planning Policy Framework paragraph 163 and paragraph 170 state that local planning authorities should ensure development does not increase flood risk elsewhere and does not contribute to water pollution.

Construction may lead to excess water being discharged from the site. If dewatering takes place to allow for construction to take place below groundwater level, this will cause additional water to be discharged. Furthermore the removal of topsoils during construction may limit the ability of the site to intercept rainfall and may lead to increased runoff rates. To mitigate increased floor risk to the surrounding area during construction there needs to be satisfactory storage of surface water and groundwater, which needs to be agreed before commencement of the development.

Construction may also lead to polluted water being allowed to leave the site. Methods for preventing or mitigating this should be proposed.

Condition 3:

Prior to occupation a maintenance plan detailing the maintenance arrangements including who is responsible for different elements of the surface water drainage system and the maintenance activities/frequencies, has been submitted to and agreed, in writing, the Local Planning Authority. Should any part be maintainable by a maintenance company, details of long term funding arrangements should be provided.

Reason

To ensure appropriate maintenance arrangements are put in place to enable the surface water drainage system to function as intended to ensure mitigation against flood risk.

Failure to provide the above required information before commencement of works may result in the installation of a system that is not properly maintained and may increase flood risk or pollution hazard from the site.

Condition 4:

The applicant or any successor in title must maintain yearly logs of maintenance which should be carried out in accordance with any approved Maintenance Plan. These must be available for inspection upon a request by the Local Planning Authority.

Reason

To ensure the SuDS are maintained for the lifetime of the development as outlined in any approved

Maintenance Plan so that they continue to function as intended to ensure mitigation against flood risk.

Conditions - phase 2 (outline application)

Condition 1:

No works except demolition shall take place until a detailed surface water drainage scheme for the site, based on sustainable drainage principles and an assessment of the hydrological and hydro geological context of the development, has been submitted to and approved in writing by the local planning authority. The scheme should include but not be limited to:

- Limiting discharge rates to 30.22 l/s for phase 1 and 2 for all storm events up to and including the 1 in 100 year rate plus 40% allowance for climate change.
- Provide 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.
- Demonstrate that all storage features can half empty within 24 hours for the 1:100 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.
- 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.
- A written report summarising the final strategy and highlighting any minor changes to the approved strategy.

The scheme shall subsequently be implemented prior to occupation. It should be those that all cutline applications are subject to the most up to date design criteria held by the LLFA.

Reason

To prevent flooding by ensuring the satisfactory storage of/disposal of surface water from the site.
To ensure the effective operation of 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 hazards.

Condition 2:

No works shall take place until a scheme to minimise the risk of offsite flooding caused by surface water run-off and groundwater during construction works and prevent pollution has been submitted to, and approved in writing by the local planning authority. The scheme shall be implemented as approved.

Reason

The National Planning Policy Framework paragraph 163 and paragraph 170 state that local planning authorities should ensure development does not increase flood risk elsewhere and does not contribute to water pollution.

Construction may lead to excess water being discharged from the site. If dewatering takes place to

allow for construction to take place below groundwater level, this will cause additional water to be discharged. Furthermore the removal of topsoils during construction may limit the ability of the site to intercept rainfall and may lead to increased runoff rates. To mitigate increased floor risk to the surrounding area during construction there needs to be satisfactory storage of surface water and groundwater which needs to be agreed before commencement of the development. Construction may also lead to polluted water being allowed to leave the site. Methods for preventing or mitigating this should be proposed.

Condition 3:

Prior to occupation a maintenance plan detailing the maintenance arrangements including who is responsible for different elements of the surface water drainage system and the maintenance activities/frequencies, has been submitted to and agreed, in writing, the Local Planning Authority. Should any part be maintainable by a maintenance company, details of long term funding arrangements should be provided.

Reason

To ensure appropriate maintenance arrangements are put in place to enable the surface water drainage system to function as intended to ensure mitigation against flood risk. Failure to provide the above required information before commencement of works may result in the installation of a system that is not properly maintained and may increase flood risk or pollution hazard from the site.

Condition 4:

The applicant or any successor in title must maintain yearly logs of maintenance which should be carried out in accordance with any approved Maintenance Plan. These must be available for inspection upon a request by the Local Planning Authority.

Reason

To ensure the SuDS are maintained for the lifetime of the development as outlined in any approved Maintenance Plan so that they continue to function as intended to ensure mitigation against flood risk.

ECC also have the following advisory comments:

Please note that water quality for areas with a high number of lorries is likely to fall under high risk classification rather than medium risk.

Any questions raised within this response should be directed to the applicant and the response should be provided to the LLFA for further consideration. If you are minded to approve the application contrary to this advice, we request that you contact us to allow further discussion and/or representations from us.

Summary of Flood Risk Responsibilities for your Council

We have not considered the following issues as part of this planning application as they are not within our direct remit; nevertheless these are all very important considerations for managing flood risk for this development, and determining the safety and acceptability of the proposal. Prior to deciding this application you should give due consideration to the issue(s) below. It may be that you need to consult relevant experts outside your planning team.

- Sequential Test in relation to fluvial flood risk;

- Safety of people (including the provision and adequacy of an emergency plan, temporary refuge and rescue or evacuation arrangements);
- Safety of the building;
- Flood recovery measures (including flood proofing and other building level resistance and resilience measures);
- Sustainability of the development.

In all circumstances where warning and emergency response is fundamental to managing flood risk, we advise local planning authorities to formally consider the emergency planning and rescue implications of new development in making their decisions.

9. Minerals and Waste Planning

The application site is not located within a Minerals Safeguarding Area, or near any mineral or waste sites. ECC therefore has no comments to make in this regard.

10. Conclusion

This site is allocated for employment use in EFDC's draft Local Plan which is being examined. In determining this application careful consideration should be given to the highways and transport requirements, need for childcare provision as a result of the development, an Employment and Skills Plan (ESP) approach with ECC to explore the wider potential social and economic benefits of this proposal, suitable connectivity, appropriate multi-functional GI provision, and implementation of suitable flood risk measures.

Health and Safety Executive – 17 September 2020

HSE was recently contacted regarding planning application EPF/2503/19, a hybrid application comprising: Phase 1 - full planning application for the erection of 1no. building for use as a warehouse (Use Class B8) etc. and Phase 2 - outline planning application for up to 22,733 square metres (GIA) of employment floorspace (Classes B1(c), B2 and B8 with all matters reserved).

HSE is a statutory consultee for certain developments within the consultation distance of major hazard sites and major accident hazard pipelines, and has provided planning authorities with access to the HSE Planning Advice Web App - <https://pa.hsl.gov.uk/> - for them to use to consult HSE and obtain our advice. However, I can find no record of HSE having been consulted on planning application EPF/2503/19, although the application site lies within the HSE consultation distance of a major accident hazard pipeline – the Epping Green to Enfield Energy Centre high pressure gas pipeline.

I should be grateful if you would ensure that the HSE Planning Advice Web App is used to consult HSE for advice on all future proposals for developments within the consultation distance of a major hazard site or major accident hazard pipeline.

Should you or your colleagues need any additional help in using HSE Planning Advice Web App to obtain HSE's advice on a proposed development, a central support service is available at lupenquiries@hsl.gov.uk or by telephone on 02030 0283708.

Highways England – 21 November 2019

Highways England will be concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN, in this case M25 Junction 26. We have examined the documentation in support of the planning application.

In our review of the supporting Transport Assessment we have some specific queries regarding the information that has been provided:

1. Throughout the report, the applicant refers to a financial incentive for staff to travel sustainably to the site (daily £2 voucher). Please could it be confirmed that this is in perpetuity? If not, and bearing in mind that this appears to be standard practice at other Next sites, what impact does it have on the use of sustainable travel methods when the incentive stops.
2. Point 4.24 states that the development proposals, via a S106, will fund a Demand Responsive Transport bus service. There are three routing options proposed, how and when will it be decided which route is preferable? Route choice will have an impact on take up.
3. Point 4.32 states that the minibus service for the photo studio will be reviewed as part of the ongoing travel planning process. Does this mean that there is a possibility this minibus will not be provided in the future? Furthermore, in Technical Note 7 (August 2019) you state that all 73 remaining visitors to the photo studio would arrive by rail and utilise the proposed minibus service. How are you going to guarantee this?
4. The applicant is proposing to provide a car share system - Liftshare. In our previous experience, Liftshare is not a popular system. Please could the applicant provide evidence of the successful car sharing schemes referenced in the Transport Assessment that Next operate currently, and the

number of staff that are signed up and regularly use Liftshare or whether more informal car share arrangements exist.

5. We note that the proposed number of car parking spaces is considerably higher than the proposed number of spaces in the previous application (EPF/1413/18). In the previous application, 152 parking spaces were proposed in total, in this application 367 car parking spaces are proposed. We do understand the need to make some allowance for shift changeover. However, why has this only been included in this application? Further details and evidence are required to support this increase in car parking. Please could the applicant confirm how many staff will work at this site?

6. Point 4.39 states that there will be 80 van parking spaces. Do these stay on site or do the operatives take these home?

7. Over the past year, we have been consulted on an increasing number of planning applications for B8 use and therefore we have been analysing the trip rates in TRICS and have received first principle data on a number of existing B8 sites. B8 use sites can be used as parcel distribution centre, which generally generate high numbers of trips. We feel that some of the trip rates you have used for the B8 use are a little low, example trip rates that we would accept are shown below. Please could the applicant undertake a sensitivity test, using these rates: [table attached to email].

8. Point 6.11 states that 'improvement to the southern roundabout of J26 of the M25 Motorway to accommodate the development in future year traffic scenarios have been discussed during the pre-application consultation period prior to the Second Planning Application.' Highways England have no record of any discussions around this mitigation since our response to the previous application earlier this year?

9. Highways England gave a formal response to the previous application (EPF/1413/18) without subjecting the mitigation proposals to a Stage 1 Road Safety Audit (RSA) on the understanding it would go through a safety assessment with Essex County Council when the work was brought forward. We have been criticised on this point through multiple FOIs since our formal response in February 2019. Therefore, we feel it would be only right that through this application, the proposed mitigation at M25 Junction 26 is subject to an RSA. Therefore, we will not be in a position to provide our final formal response until this has been carried out unless we can agree some appropriate wording for a condition.

10. In the previous application, the mitigation at Junction 26 was combined with mitigation on Essex County Council's highway – has similar mitigation on Honey Lane been agreed for this application? We feel that it would be sensible for all the work around the junction to be done at the same time. We have had no contact with Essex Highways with regards to this revised application.

11. Highways England feel that insufficient detail has been provided in relation to the modelling results. Please could details of the queues on all arms of the roundabout be provided for all scenarios – including future years.

12. Finally, within the appendices, there are some numbers that need clarifying for Highways England. In Technical Note 3 from December 2018, it was stated that there would be 19 additional trips in the AM on the M25 WB off-slip. In this application, there are 39? However, the applicant is stating that there is only a net increase of 12 trips overall in comparison to the previous application

(Table 2 of Technical Note 7 August 2019). Please could the numbers be clarified for us to ensure we are aware of the full impact of this development.

Currently, there is still further analysis to be undertaken and information to be provided by the application before we can take a view on whether there is a severe impact on the SRN.

Natural England – 3 January 2020

Our comments on this development should be read in conjunction with those in our letter which was sent to Epping Forest District Council on 15 June 2018 which set out our general advice relating to applications coming forward ahead of the strategic approach for mitigation of impacts on Epping Forest Special Area of Conservation ('SAC') and more recent communications relating to the Local Plan Habitats Regulations Assessment, in particular, those relating to air quality and those relating to this specific development (which includes our joint meeting with the applicant on the 5th of December 2019 and subsequent correspondence).

Natural England maintains that the most appropriate way for Impacts on Epping Forest Special Area of Conservation ('SAC') to be mitigated is through a strategic solution developed in conjunction with local plan processes. Natural England has previously advised that it will be difficult for your authority to rule out an Adverse Effect on Integrity ('AEOI') on the SAC for individual developments or to identify suitable mitigation measures to address air quality impacts until further work on the Local Plan HRA has been completed and a mitigation strategy has been agreed. Without prejudice to this position we have considered the HRA provided on its own merits.

We welcome the amendments made to the December 2019 iteration of the HRA which reflects our previous comments and contains an innovative approach to mitigation.

Natural England accepts the conclusions of the HRA in relation to Lee Valley Special Protection Area ('SPA'). We welcome the acknowledgement that air quality impacts, recreational pressure and urbanisation impacts should be screened in and considered further through an appropriate assessment.

Appropriate Assessment - Air Quality

With regards to commercial traffic we note that the applicant considers that a Routing Management

Plan ('RMP') and 'GeoFencing' technology can be used to prevent any additional usage of roads within 200m of the forest. With regards to staff traffic we note that an Interim Travel Plan ('ITP') enforced by binding contractual obligations will perform a similar function.

Natural England does not consider that assessment of the effectiveness and enforceability of these plans falls within our remit or area of expertise but has previously advised that developments which lead to no net increase in traffic movements through roads within 200m of the SAC compared to existing usage could be considered to have no likely significant or adverse effects and can therefore be screened out. Your authority should therefore satisfy itself that the measures proposed would result in no net increase in traffic. To achieve this EFDC as the competent authority will need to be certain that the measures being proposed are enforceable (both legally and in practice), quantifiable and effective beyond reasonable scientific doubt. The HRA does not currently provide this information from EFDC as the competent authority - it only includes the opinion of the project proposer.

You will need to consider potential traffic dispersion at times of peak flow and in the event of road traffic incidents or congestion (for example during any closure or significant delay on the M25). A development will need to prevent traffic movements on roads within 200m of the SAC even in adverse traffic conditions to demonstrate that it can deliver no net increase in vehicle movements.

It is worth noting with regard to the 'interim' nature of the ITP that this assumes a mitigation strategy will be agreed within a reasonable period and that the measures put forward for mitigating residential allocations in the local plan will be applicable to this development. Whilst Natural England is working to that same assumption, the HRA needs to consider whether the measures can operate in perpetuity and the potential impacts of any proposed schemes being discontinued on long term traffic flows.

With regard to the 3rd party traffic and breaches and the Demand Response Transport ('DRT') offsetting you should seek independent legal advice as to whether this can be considered acceptable mitigation given the rulings in the Dutch nitrogen cases and that Epping Forest has a 'restore' objective with regards to air quality. If not, any additional 3rd party traffic generation or breaches caused by the development would need to be considered in combination with Local Plan traffic growth.

Natural England does not consider assessment of the effectiveness of public transport schemes falls within our remit or area of expertise. It is unclear to us whether, in judging the likely take-up of a DRT, the use of an estimate of patronage from existing AADT of half of one percent is 'conservative' or realistic within this local context. Your authority should seek to reasonably assure itself of the validity of these projections and assess the level of confidence that should be attached to them. As with ITP there is a need to consider whether this scheme could operate throughout the life of the development if no other mitigation strategy is agreed and if not what the likely implications of the scheme ending will be. If your authority is minded to approve this application you should consider whether there is a need to monitor the uptake of the DRT and whether there needs to be a mechanism to amend the scheme based on the findings of that monitoring.

Recreational Pressure

Natural England notes that the HRA relies on commercial and staff controls to prevent recreational

trips to Epping Forest SAC and your authority will again need to consider the effectiveness and enforceability of these measures. It is notable that the document makes no mention of 3rd party users or breaches in relation to recreational pressure. Natural England is aware that your authority has an interim approach to recreational management in place. We are content for this development to be dealt with in accordance with the principles set out in this approach.

Increased Urbanisation

Natural England notes that the HRA relies on commercial and staff controls to prevent recreational trips to Epping Forest SAC and your authority will again need to consider the effectiveness and enforceability of these measures.

Natural England – 21 November 2019

Summary of Natural England's advice: Further information required to determine impacts on Epping Forest Special Area of Conservation.

As submitted, the application could have adverse effects on Epping Forest Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI). Natural England requires further information in order to determine the significance of these impacts and the scope for mitigation. The following information is required in respect of the Habitats Regulations Assessment (HRA):

More detailed information in the Appropriate Assessment regarding the air quality impacts on Epping Forest SAC, particularly in relation to the operational phase of the development. The HRA does not adequately reflect the advice contained in our advice letter dated 15 June 2018 Annex 1. This letter outlines key pieces of information that should be included in a HRA in relation to air quality assessments relating to applications coming forward ahead of the strategic approach being in place to mitigate impacts identified as part of the Local Plan. (Our Ref 247581).

Further information required – HRA

Natural England notes that the applicant has provided an air quality assessment as part of the Habitats Regulations Assessment which concludes that likely significant effects "in combination" cannot be ruled out and therefore mitigation is required. Natural England agrees with this conclusion. However, on the basis of information provided in the Appropriate Assessment of the HRA, Natural England advises that there is currently insufficient information provided on the mitigation measures identified to enable Natural England to agree with a conclusion of no adverse effect to be reached in relation to air quality impacts. We are also concerned that the HRA is reliant on being able to contribute financially towards costed mitigation measures identified in the Local Plan Air Quality Mitigation Strategy. However this strategy does not currently exist and it cannot therefore be relied upon for delivering any mitigation to avoid adverse effects on the SAC. For the

reasons outlined in our letter dated 23 November 2019, in our view it is going to be very difficult for the competent authority to rule out an Adverse Effect on Integrity ('AEOI') of the SAC or to identify suitable mitigation measures to address air quality impact until further work on the Local Plan HRA has been completed and mitigation strategy has been agreed.

Secretary of State (National Casework Unit) – 31 October 2019

I confirm that we have no comments to make on the environmental statement.

Waltham Forest Council – 4 December 2020

I refer to your consultation regarding the above hybrid application, and this Council has the following views to make:

Principle of development

The proposal is for development of existing Metropolitan Green Belt Land. Whilst the site is proposed for removal from the Green Belt and allocation (WAL.E8) for employment development (Class B1(c), B2 and B8) in the [EFDC Local Plan Submission Version 2017](#), this document has not been formally gazetted, and is still before the inspector as of 2nd December 2020.

The main modification schedule having been submitted to the planning inspectorate on the 21st October 2020 and an indication of delay from the planning inspector being stated at the co-op meeting hosted by EFDC on Wednesday 11th November. It should be considered, for the purpose of this assessment, that the land exists with a formal designation as Metropolitan Green Belt Land.

As such, the proposal will need to be assessed by EFDC as the Local Planning Authority to determine whether 'very special circumstances' exist in order to justify the land use principle against the policies of the NPPF, London Plan 2016, Draft London Plan, and the Epping Forest Local Plan (1998) and adopted Alterations (2006).

Biodiversity

The site is located within the Metropolitan Green Belt, Epping Forest Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI). In the inspectorate's letter of 2nd August 2019, the inspectorate noted that the Habitats Regulations Assessment January 2019 (the HRA) (EB209) found that the Plan would be likely to have a significant effect upon the Epping Forest Special Area of Conservation (the SAC) in respect of both atmospheric pollution and disturbance from recreation/urbanisation. The inspector went on to comment that it could not be concluded beyond reasonable scientific doubt that the Plan will not adversely affect the integrity of the SAC.

Considering the above, concern is raised that this specific application does not provide sufficient detail of how the air quality impacts will be mitigated, particularly in relation to the operations of the proposal. Therefore, concern is raised that the proposal could have adverse effects on the integrity of the Epping Forest Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI). In the context of the concerns relating to the HRA by the Inspectorate and Natural England, the submitted proposed mitigations would be insufficient in ensuring the integrity of the SAC and SSSI would be protected.

Noting discussions are ongoing with Natural England regarding improvements to the HRA and Draft Local Plan as a whole, it is recommended EFDC as the local planning authority consult directly with Natural England to ensure the site specific mitigation methods are effective and achievable to offset the impacts of the development.

Highways impacts

The transport assessment does not seem to provide any information outside of the modelled AM and PM peaks, so it is unclear what the daily movements in and out are expected to be.

If the distribution centre operates similarly to the peak hours in terms of HGV and OGV arrivals and departures, then the cumulative impact of having an additional 100 HGV's/OGV's a day using the Kings Head Hill Junction could present a significant impact in terms of traffic and safety and further exacerbate traffic conditions in the surrounding roads including Sewardstone Road and Kings Head Hill, as well as alternative routes such as Station Road, which will lead to adverse impacts of road safety, disturbance, air quality on North Chingford's centre. Additionally, concerns are raised to the impact of HGV and Private Worker transport upon residential streets of Drysdale Estate.

It is strongly encouraged that the transport impact statement be expanded upon to model the local streets of the neighbouring boroughs, in order to adequately determine the perceived impact to the Borough of Waltham Forest in terms of congestion, traffic safety and air quality. The information must be presented in a clear and concise format.

Further information in relation to predicted out of peak traffic figures for all traffic including HGV, OGV's and standard vehicles with relevant staff split for the King Head Hill junction (please see above for detailed description).

Further information in relation to contingency routes when M25 Junction 26 is not accessible (please see above for detailed description).

Further information on Construction Logistics Plan specifically in relation to the LBWF's roads, including but not limited to Sewardstone Road and Kings Head Hill, and Station Road.

Please note that the above information has been expanded upon further in the attached appendix as prepared by our specialist highways officers.

We trust that you will take the above into account when determining this application and I look forward to receiving a copy of the decision.

Thames Water

Waste Comments

FOUL WATER network capacity - **No objection** - Thames Water are aware of some network constraints in the vicinity of the proposed development. We are however confident that should the planning application be approved, any investigations to understand the network performance in more detail and if required, associated upgrades can be delivered in time to serve the development. We will therefore not be seeking a planning condition relating to foul water network matters.

The application indicates that SURFACE WATER will NOT be discharged to the public network and as such Thames Water has no objection, however approval should be sought from the Lead Local Flood Authority. Should the applicant subsequently seek a connection to discharge surface water into the public network in the future then we would consider this to be a material change to the proposal, which would require an amendment to the application at which point we would need to review our position.

Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.

Water Comments

Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. Thames Water have contacted the developer in an attempt to agree a position on water networks but have been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission. No properties shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional flows to serve the development have been completed; or - a housing and infrastructure phasing plan has been agreed with Thames Water to allow additional properties to be occupied. Where a housing and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan. Reason - The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development” The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application approval.